Draft

MITIGATED NEGATIVE DECLARATION
TRES AMIGOS WATERLINE REPLACEMENT PROJECT

Volume I

Prepared by:

WILLIS ENVIRONMENTAL PLANNING
238 Sychar Road
San Diego, CA 92114
619.925.2836
www.willisenvironmentalplanning.com

January 2024

Prepared for:

VALLECITOS WATER DISTRICT
Water and Wastewater Specialists since 1955

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DRAFT
INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

TRES AMIGOS WATERLINE REPLACEMENT PROJECT

Lead Agency:
VALLECITOS WATER DISTRICT
201 VALLECITOS DE ORO
SAN MARCOS, CALIFORNIA 92069

VALLECITOS WATER DISTRICT
Water and Wastewater Specialists since 1955

Prepared by
Willis Environmental Planning
238 Sychar Road
San Diego, CA 92114
Telephone: (619) 925-2836

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TABLE OF CONTENTS

Section **Page**

LIST OF TABLES

LIST OF FIGURES

APPENDICES

ACRONYMS AND ABBREVIATIONS

AQIA	Air Quality Impact Analysis
AQMP	Air Quality Management Plan
BMPs	Best Management Practices
CAAQS	California Ambient Air Quality Standards
CalEEMod	California Emission Estimator Model
Caltrans	California Department of Transportation
CARB	California Air Resources Board
CBC	California Building Code
CEQA	California Environmental Quality Act
CFR	Code of Federal Regulations
CO	Carbon Monoxide
CO2E	Carbon Dioxide Equivalent
CWA	Clean Water Act
dBA	A-Weighted Sound Level
DTSC	California Department of Toxic Substances Control
EPA	Environmental Protection Agency
GIS	Geographic Information System
I-15	Interstate 15
IS/MND	Initial Study/ Mitigated Negative Declaration
Leq	Equivalent Sound Pressure Level
LF	linear feet
MT	metric tons
MW	mega-watt
NAAQS	National Ambient Air Quality Standards
NAGPRA	Native American Grave Protection and Repatriation Act
NAHC	Native American Heritage Commission
NOx	Nitrogen Oxides
NPDES	National Pollutant Discharge Elimination System
O3	ozone
PM10	Particulate Matter (10 microns in diameter or less)
PM2.5	Particulate Matter (2.5 microns in diameter or less)
RAQS	Regional Air Quality Strategy
ROG	Reactive Organic Gasses
RWQCB	Regional Water Quality Control Board
SDAB	San Diego Air Basin
SDAPCD	San Diego Air Pollution Control District
SF	square feet
SIP	State Implementation Plan

ACRONYMS AND ABBREVIATIONS

SLF	Sacred Lands File
SOx	Sulfur Oxides
SWPPP	Stormwater Pollution Prevention Plan
THPO	Tribal Historic Preservation Officer
QSD	Qualified SWPPP Developer
USFWS	U.S. Fish and Wildlife Service
VOC	Volatile Organic Compounds
District	Vallecitos Water District

1.0 INTRODUCTION

1.1 Vallecitos Water District

The Vallecitos Water District (District) provides potable, wastewater and reclaimed water services within northern San Diego County, including service to the City of San Marcos; parts of the cities of Carlsbad, Escondido, and Vista; and unincorporated areas in north San Diego County (**Figure 1, Vallecitos Water District Service Area**). In addition, the District wholesales recycled water to the City of Carlsbad and the Olivenhain Municipal Water District. Originally founded as the San Marcos County Water District in 1955 by a group of local citizens to answer the shrinking water table in the San Marcos and Twin Oaks valleys, the District was formed in accordance with Division 12 of the Water Code (sections 30000-33901 et seq.) to provide imported water from Northern California and the Colorado River. In 2023, the Vallecitos Water District served a population of more than 108,000 within its 45-square-mile boundary (Vallecitos Water District, 2023).

1.2 Purpose of the Initial Study/Mitigated Negative Declaration

This document is a Draft Initial Study/ Mitigated Negative Declaration (IS/MND) for evaluation of environmental impacts resulting from implementation of the District's Tres Amigos Waterline Replacement Project and has been prepared in accordance with the following:

- California Environmental Quality Act (CEQA) of 1970 (Public Resources Code Sections 21000 et seq.); and
- California Code of Regulations, Title 14, Division 6, Chapter 3 (State CEQA Guidelines, Sections 15000 et seq.).

The purpose of the IS/MND is to determine if any potentially significant impacts are associated with the proposed Project and to incorporate mitigation measures into its design, as necessary, to reduce or eliminate the significant or potentially significant effects of the Project. A "significant effect" or "significant impact" on the environment means "a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project" (Guidelines §15382). As such, the District's intent is to adhere to the following CEQA principles:

- Provide meaningful early evaluation of site planning constraints, service and infrastructure requirements, and other local and regional environmental considerations. (Pub. Res. Code §21003.1);
- Incorporate environmental considerations into project conceptualization, design, and planning at the earliest feasible time. (State CEQA Guidelines §15004[b][3]); and,

Specify mitigation measures for reasonably foreseeable significant environmental effects and commit to future measures containing performance standards to ensure their adequacy when detailed development plans and applications are submitted. (State CEQA Guidelines §15126.4).

1.3 Purpose and Need and Project Objectives

The District has experienced operation and maintenance issues with the existing pipeline due to the pipeline material and alignment location. Through the Bonsall Farms properties along the southern portion of the existing alignment, the existing pipeline has been graded and planted over in numerous locations. This grading has resulted in portions of the pipeline having insufficient cover. Existing Bonsall Farms facilities have also been constructed within the easement and over the pipeline. A portion of the northern segment of the pipeline east of Fairview Drive was constructed with an overland alignment that has since been developed into a rural residential area. The pipeline now travels through the backyards of several residences that limit access to the pipeline. Breaks in this portion of the pipeline have caused damage to these residential properties.

The following objectives have been identified:

- Replace pipelines that are at risk of and which have a history of frequent pipeline breaks.
- Replace pipeline with a material that is appropriate for use in pressurized potable water systems;
- Relocate pipeline alignment out of private front and backyards and into public rights-of-way/District easements to improve access to the new pipeline for maintenance and repairs.
- Maximize use of existing easements, to the extent feasible to reduce easement acquisition needs.

1.4 CEQA Authority to Prepare a Mitigated Negative Declaration

The District is responsible for the review and approval of the proposed Project and is also acting as the lead agency for the implementation of the California Environmental Quality Act (CEQA) (California Public Resources Code Section 21000 et seq.) for the Project, as necessary and appropriate. As is true for the proposed Project, a Mitigated Negative Declaration (MND) may be prepared where the Initial Study revealed one or more potentially significant effects on the environment – which may result from the project, but subsequent revisions to the project would avoid the effects or mitigate the source to a less than significant level. An MND can simplify the CEQA process while ensuring that potentially significant effects are avoided or mitigated to a less than significant level (See California Public Resources Code Section 21064.5). This MND has been prepared in accordance with CEQA, the CEQA Guidelines (California Code of Regulations Section 15000 et. seq). and relevant case law; and it incorporates all of the project revisions mitigating any environmental effects to a less than significant level.

The District is lead agency for the Tres Amigos Waterline Replacement Project, as it is the public agency with the primary responsibility for preparing environmental documents and for approving, constructing, and operating the project. District is organized in accordance with the provisions of the County Water District Law (California Water Code Section 30000 et seq) for the purpose of providing domestic water supplies. District is empowered to plan, construct, operate, maintain,

repair, and replace water system facilities as needed to provide water service in compliance with applicable standards and regulations. The District routinely plans and constructs new facilities, maintains them, and replaces them as necessary to maintain adequate, reliable, and safe water service for its customers. The Project is a continuation of the authority that District has exercised in the past.

1.5 List of Discretionary Actions

The following discretionary approvals by the District, as Lead Agency, are anticipated to be necessary for implementation of the proposed Project:

- Adoption of a Mitigated Negative Declaration (MND)
- Approval of the proposed Project

1.6 Other Agencies that May Use this MND

This MND is intended for use by responsible and trustee agencies that have jurisdiction over resources that may be affected by this project, as provided in CEQA.

- County of San Diego Excavation Permit for work within Gopher Canyon Road and Fairview Drive
- County of San Diego Noise Variance for nighttime construction.

1.7 Document Organization

This Initial Study/MND is organized to facilitate a basic understanding of the existing setting and environmental implications of the proposed Project and includes the flowing sections:

Section 1.0 Introduction. Provides information about CEQA and its requirements for environmental review and explains that an Initial Study/MND was prepared by District to evaluate the proposed Project's potential to impact the physical environment. This section also includes a list of the discretionary approvals that would be required for each component of the Project.

Section 2.0 Project Description. Provides information about the location of the Project and their environmental settings. It also includes a description of the proposed Project's physical features, as well as its construction and operational characteristics.

Section 3.0 Summary of Impacts. Provides a summary of the environmental impacts of the Project and the proposed mitigation measures.

Section 4.0 Initial Study. Provides a summary of the proposed Project, land use designation and zoning classifications, surrounding land uses, required entitlements, discretionary approvals and permits required for implementation. It also identifies the location of the Project and provides a general description of the surrounding environmental settings.

Section 5.0 Environmental Factors Potential Affected. Lists the environmental factors that would be potentially affected by the proposed Project and identifies the rationale for preparation of a Mitigated Negative Declaration.

Section 6.0 Evaluation of Environmental Impacts. Includes the Environmental Checklist and evaluates the proposed Project's potential to affect the physical environment. Each response on the checklist form is discussed and supported with sufficient data and analysis as necessary.

Section 7.0 References. Includes a list of all references cited in the IS/MND.

Section 8.0 Preparers. Includes a list of the persons that prepared this IS/MND.

Section 9.0 Draft Mitigation Monitoring & Reporting Program. identifies all applicable environmental mitigation requirements; the method and timing of verification; and the responsible party that will ensure that each action is implemented.

1.8 Public Review Process

During the preparation of the Initial Study underlying this MND, the District made good faith efforts to coordinate with responsible and trustee agencies as required under California Public Resources Code Section 21080.3. Having completed the Initial Study and revised the proposed Project to avoid and/or mitigate potential environmental effects to a less than significant level, the District intends to adopt this MND to inform the District Board of Directors of the potential environmental effects of the proposed Project for consideration prior to any action to approve the proposed Project. However, CEQA requires that prior to adoption, an MND shall be submitted to the public and to all responsible and trustee agencies for review and comment. A Notice of Completion and Electronic Submittal Form were submitted to the California Office of Planning and Research State Clearinghouse on January 17, 2024, thereby starting the State-level review of the MND for responsible and trustee agencies.

In reviewing the MND, affected public agencies and the interested public should focus on the sufficiency of the document in identifying and analyzing the Project's possible impacts on the environment. A copy of the Draft MND and related documents are available for review at the District (see address below) between the hours of 8 a.m. and 5 p.m., Monday through Friday.

Vallecitos Water District
201 Vallecitos de Oro
San Marcos, California 92069

The document is also available on the District's website (http://www.vwd.org/).

Comments on the IS/MND may be made in writing before the end of the public review period. A 30-day review and comment period from January 17, 2024, 2023 to February 16, 2024 has been established in accordance with Section 15072(a) of the CEQA Guidelines (14 CCR 15000 et seq.).

Following the close of the public comment period, the District will consider this MND and comments thereto in determining whether to approve the proposed Project.

Written comments on the IS/MND should be sent to the following address by 5:00 p.m., February 16, 2024:

Vallecitos Water District
201 Vallecitos de Oro
San Marcos, California 92069
Contact: Mr. Ryan Morgan, Senior Engineer
Telephone: 760.744.0460

The review period and the procedure for submitting comments regarding this MND are set forth in the Notice of Intent To Adopt A Mitigated Negative Declaration which was published in the San Diego Union Tribune and circulated to property owners within a 500-foot radius of the Project. CEQA Guidelines Section 15204(c) states that reviewers should focus on the District's proposed findings that the project would not have a significant effect on the environment. The District can adopt the MND only if there would not be a significant effect on the environment. Reviewers should clearly state the basis for their comments and submit available factual support as appropriate. The District will consider all public and agency comments.

2.0 PROJECT DESCRIPTION

2.1 Project Location

The Project is located north of the City of Vista, within the unincorporated community of Bonsall within the County of San Diego. The proposed Project located just north of Tres Amigos Ranch Road, one mile south of State Route 76 (SR-76), one-quarter mile east of East Vista Road and four miles west of Interstate 15 (I-15), north of State Route 78 (SR-78) (**Figureº2, Regional Location**). The alignment travels in generally a north/south direction with east/west extensions at the northern and southern terminuses. The alignment generally travels through the Bonsall Farms property, along Ormsby Way and Fairview Drive, across Gopher Canyon Road, along Fairview Drive with a small extensions onto Carrio Drive and Via del Cerro (**Figure 3, Project Location**).

The Vallecitos Water District (District) is proposing to replace approximately 9,436 linear feet[1] (LF) of the Tres Amigos water pipeline located within the northern limits of the District's service area (**Figure 1**). The existing pipelines, installed during the 1950s and 1960s, consist of 6-and 8-inch tar wrapped 12-14 gauge steel and have experienced frequent pipeline breaks. This pipeline would be replaced with 8-inch PVC pipeline. The proposed alignment of the replacement pipeline originates within an agricultural field (Bonsall Farms) at the southern connection point and travels north through a residential area located north of Gopher Canyon Road, generally in and around Fairview Drive. Pressure within the pipeline ranges from 140 to 230-psi (NV5, 2021a.)

The Project would involve replacement of the pipeline through an active agricultural area, vacating existing District easements (through Bonsall Farms and residential properties), securing new permanent easements, and relocating of existing residential services along Fairview Drive north of Gopher Canyon Road into public rights-of-way or District easements (reconnecting water meters, new service lines/laterals).

2.2 Environmental Setting

The proposed pipeline alignment extends approximately 9,436-feet in length from its southern most point to its northern most point, crossing 17 privately owned parcels. The majority of the proposed alignment has been previously disturbed by grading and development, plowing, or road construction with much of the area consisting of either dirt or asphalt road, The southern portion of the proposed alignment, south of Gopher Canyon Road, is surrounded by intensive agricultural uses and rural private residences. North of Gopher Canyon Road, the alignment is surrounded by rural private residences.

1 Total length of pipeline replacement, including the extension segments on Carrio Drive and Via Del Cierro.

2.2.1 Affected Parcels

As shown on **Table 1**, properties along the proposed alignment are designated as Semi-Rural Residential (SR-2 and SR-4) under the County of San Diego General Plan and are located within the Bonsall Community Planning Area (San Diego County General Plan, 2011). Properties along the alignment are zoned A70 on the County of San Diego zoning map (San Diego County Zoning Ordinance, 1978, as amended).

TABLE 1. PARCELS ALONG THE PROPOSED ALIGNMENT

APN	Ownership/ Use	General Plan Land Use Designation	Zoning Designation
170-161-14	Private homeowner	Semi-Rural Residential (SR-2)	Limited Agriculture (A70)
170-161-19	Private homeowner	Semi-Rural Residential (SR-2)	Limited Agriculture (A70)
170-161-39	Private homeowner	Semi-Rural Residential (SR-2)	Limited Agriculture (A70)
170-161-38	Private homeowner	Semi-Rural Residential (SR-2)	Limited Agriculture (A70)
170-161-86	Private homeowner	Semi-Rural Residential (SR-2)	Limited Agriculture (A70)
170-162-04	Private homeowner	Semi-Rural Residential (SR-2)	Limited Agriculture (A70)
170-162-43	Private homeowner	Semi-Rural Residential (SR-2)	Limited Agriculture (A70)
170-162-29	Private homeowner	Semi-Rural Residential (SR-2)	Limited Agriculture (A70)
170-162-30	Private homeowner	Semi-Rural Residential (SR-2)	Limited Agriculture (A70)
170-162-27	Private homeowner	Semi-Rural Residential (SR-2)	Limited Agriculture (A70)
170-162-26	Private homeowner	Semi-Rural Residential (SR-2)	Limited Agriculture (A70)
170-162-34	Private homeowner	Semi-Rural Residential (SR-2)	Limited Agriculture (A70)
170-162-33	Private homeowner	Semi-Rural Residential (SR-2)	Limited Agriculture (A70)
170-162-53	Private homeowner	Semi-Rural Residential (SR-2)	Limited Agriculture (A70)
170-170-27	Private agriculture	Semi-Rural Residential (SR-4)	Limited Agriculture (A70)
170-170-34	Private agriculture	Semi-Rural Residential (SR-4)	Limited Agriculture (A70)
170-170-35	Private agriculture	Semi-Rural Residential (SR-4)	Limited Agriculture (A70)

Sources: San Diego County General Plan, 2023, as amended.
San Diego County Zoning Ordinance, 1978, as amended.

2.2.1 Existing Utilities

Agencies identified as having utilities along the alignment include Vista Irrigation District (VID) San Diego Gas & Electric (SDG&E), and various telecommunication companies (Cox Communications and AT&T).

The Vista Irrigation District (VID) has potable water pipelines in and around the project area. Specifically, an existing 10-inch AC pipe is located within Gopher Canyon Road, west of the

intersection of Fairview Drive. This pipeline proceeds north along Fairview Drive and connects to the VID/District interconnection. The interconnection contains a pressure reducing valve to allow for distribution of water from the District's Tres Amigos waterline to VID's system. After the interconnection, the pipeline continues north along the western shoulder of Fairview Drive approximately 2,300 LF to the intersection of Fairview Drive and Alvarado Drive.

SDG&E has overhead electrical lines and Cox Communications and AT&T have overhead telecommunication lines located throughout the project area, primarily along paved roadways. These lines are not anticipated to impact the pipeline construction activities.

2.3 Project Characteristics

The Project entails the replacement of a portion of the existing Tres Amigos Waterline. This section describes the characteristics of project construction, proposed permanent and temporary features of the project, and work areas that would result in temporary and permanent impacts related to project implementation. These characteristics form the basis of analyzing the potential environmental impacts pursuant to CEQA.

The Vallecitos Water District was progressing through the project design process at the time of this IS/MND's preparation. Because final design is pending, the project description incorporates assumptions for potential pipeline installation methods and prospective work areas that would be used by the contractor to implement the Project. These assumptions are based on the current understanding of District's engineers as gained through preliminary planning work and experience with similar infrastructure improvement projects, and are appropriate to inform environmental impact analysis pursuant to CEQA.

As the project design progresses, the District will continue to review details against the assumptions presented in this IS/MND to ensure the Project that is ultimately constructed remains in compliance with CEQA. Should the ultimate design diverge from that analyzed in this IS/MND, the Vallecitos Water District will determine necessary steps for the Project's CEQA compliance, including additional environmental impact analysis, if needed, and preparation of either an addendum or a subsequent IS/MND, whichever is appropriate.

2.3.1 Proposed Pipeline Alignment

As shown on **Figure 4, *Proposed Alignment – Southern Segment***, the proposed alignment would connect to an existing 10-inch steel tee located approximately 1,750 LF northeast of the intersection of E. Vista Way and Tres Amigos Ranch Road within the Bonsall Farms property (APN 170-170-35). The proposed alignment proceeds north through existing dirt roads for approximately 150 LF at which point it turns west to follow a dirt road located adjacent to planted fields. The alignment follows this road for approximately 1,020 LF to the intersection of another dirt road that runs north/south. The proposed alignment turns north to follow along the dirt road

approximately 1,050 LF to the southern endpoint of Ormsby Way, exiting the Bonsall Farms property.

The proposed alignment then enters the paved roadway of Ormsby Way, which is within a 60-foot wide road and utility easement. The pipeline continues north within Ormsby Way for approximately 1,640 LF at which point it re-enters the Bonsall Farms property. The proposed alignment then proceeds east for approximately 950 LF along Bonsall Farms' northern boundary.

After exiting the Bonsall Farms property, the proposed alignment enters a paved private driveway (APN 170-162-53) for approximately 250 LF prior to entering Gopher Canyon Road. Within APN 170-162-53 the alignment would be located within the District's existing 20-foot easement, as well as a 20-foot private road and utility easement.

From the location where the alignment enters the intersection of Gopher Canyon Road and Fairview Drive, it would continue north on Fairview Drive approximately 1,685 LF within the eastern shoulder of the paved roadway to Carrio Drive (See **Figure 5, *Project Alignment – Northern Segment***). From there, the proposed alignment would continue north past the existing 20-foot easement and continue along the eastern shoulder of Fairview Drive for approximately 1,020 LF. At this point the alignment would turn to the east and proceed along an existing paved private driveway. The paved driveway is within 28-foot road/utility easements that cover the northern portions of 3151 Fairview Drive (APN 170-162-26), 3143 Fairview Drive (APN 170-162-27), 3149 Fairview Drive (APN 170-162-30), and 3147 Fairview Drive (APN 170-162-29). The alignment would proceed east approximately 1,070 LF. Approximately 165 LF after entering APN 170-162-29, the alignment would re-enter the District's existing easement, proceeding northeast approximately 25 LF where it would turn and continue east within an existing 28-foot wide road/utility easement along the southern boundary of APN 170-162-04. The new alignment would continue east within the 28-foot road/utility easement to approximately 5-feet west of the eastern property line. At this location, the alignment would turn 90-degrees and proceed north along the eastern boundary of the property approximately 320 LF. The proposed alignment/replacement pipeline would terminate approximately 10-feet south of the northern property line. A 2-inch blow-off assembly would be installed at the end point to allow for pipeline flushing. A service lateral would be installed near the endpoint of the pipeline to connect to the existing service lateral within APN 170-162-03. Additionally, two new 8-inch lateral connections would be installed, from Fairview Drive, along Carrio Drive and Via del Cerro, spanning 289 LF and 490 LF, respectively.

2.3.2 Rights-Of-Way and Easements

The existing pipeline is installed within a 20-foot District easement through Bonsall Farms and Ormsby Way until the pipeline enters Gopher Canyon Road. Ormsby Way is also located within a 60-foot wide private road and utility easement. The pipeline is located within County ROWs while it is within the paved roadway of Gopher Canyon Road, and Fairview Drive. North of Carrio

Drive, the existing pipeline exits the paved roadway and remains within a 20-foot District easement.

In areas where the proposed alignment exits the existing easement, a new easement agreement between the District and the property owner(s) will be required. Within the Bonsall Farms properties, the existing easement will be vacated, and a new easement agreement will be acquired. A County excavation permit will be required for all work within County rights-of-way. For Ormsby Road, Carrio Drive, Via del Cerro and the access roads east of Fairview Drive, it is anticipated that the existing road and utility easements can be used for the new pipeline. This will require notifying and approval by the property owners.

2.4 Project Construction

The proposed Project would utilize 8-inch diameter PVC C900 pipe, in conformance with the District's standards and specifications. Per District design guidelines, the PVC pipe would be DR 14 (pressure class 305-psi). The pipeline shall be installed via open trench construction; installation and trench backfill shall conform to the requirements of District Standard Drawing W-17 and W-18. Open trench installation would occur within the roadway of Ormsby Way, Gopher Canyon Road, Fairview Drive, Carrio Drive, and private driveways south of Gopher Canyon Road and east of Fairview Drive. Trench resurfacing would conform to County standards and requirements and at a minimum, would match the existing roadway section. Gate valves would be utilized for pipeline isolation in accordance with District Standard Drawing W-16. Pipeline thrust restraint is proposed to consist of thrust blocks to be designed and installed in accordance with District Standard Drawing W-15.

In locations where the proposed alignment exits current District easements, new easements will be obtained from the property owners. Relocation of the pipeline alignment would require that existing service laterals and/or water meters be relocated to allow for continued water services to the residences currently served by the pipeline which crosses overland through the existing 20-foot easement.

The existing water meter at 3143 Fairview Drive (APN 170-162-27) is located in the backyard of the property, approximately 40 feet from the southeast corner of the residence. An existing septic system and leach field are located along the eastern edge of the property. According to County records, the leach field is setback approximately 12 feet from the eastern property line. This setback would allow for a new service lateral to be installed from the pipeline located within the private driveway to the existing meter location. The new lateral would have an approximate length of 250 LF.

The existing water meter at 3147 Fairview Drive (APN 170-162-29) is located on the south side of the existing waterline that crosses the northwestern corner of the property. This meter location can be connected to by installing a new service lateral from the proposed pipeline. This lateral would have an approximate length of 100 linear feet. The property has an existing fence/gate that

the new lateral would be required to be installed underneath to reach the existing meter location. New service laterals would also be installed to connect existing water meters at 3151 Fairview Drive (APN 170-162-27), 3149 Fairview Drive (APN 170-162-30), and 1340 Carrio Drive (APN 170-162-46).

An existing 6-inch AC pipeline branches from the Tres Amigos waterline within the intersection of Gopher Canyon Road and Fairview Drive, within the County right-of-way. Once the new project alignment has been installed, tested, and disinfected, a temporary shutdown of the existing 6-inch ACP pipeline at the intersection of Gopher Canyon Road and Fairview Drive will allow for connection to the new alignment. Coordination between the District and VID will be required to determine periods of work that will allow for the downtime of the interconnection near the intersection of Gopher Canyon Road and Fairview Drive without impacting VID operations.

Potable water service to existing customers along Carrio Drive is supplied by a 6-inch AC pipeline that branches off the overland alignment portion of the Tres Amigos pipeline northeast of the intersection of Fairview Drive and Carrio Drive. It is proposed that this pipeline be connected to the proposed Project alignment within the intersection by installing an approximately 300 linear foot 8-inch pipeline that will travel east to connect to the existing pipeline once it enters Carrio Drive. Once the new project alignment has been installed, tested, and disinfected, a temporary shutdown of the existing 6-inch ACP pipeline will allow for connection to the new alignment. The paved roadway of Carrio Drive is located within an existing 40-foot wide private road and utility easement.

An existing tee is located immediately north of the intersection of Fairview Drive and Carrio Drive along the existing Tres Amigos waterline which supplies a 6-inch AC pipeline which travels along the western lane of Fairview Drive north to serve existing residences along Via del Cerro. The connection point is located within County right-of-way. A new tee will be installed on the proposed Project alignment to connect to the existing 6-inch pipeline. Once the new project alignment has been installed, tested, and disinfected, a temporary shutdown of the existing 6-inch ACP pipeline will allow for connection to the new alignment.

In areas where the existing pipeline would be abandoned, the majority of the existing pipeline would be abandoned in place. Abandoned pipelines would be cut and plugged with low strength concrete slurry. In locations where the existing pipeline could impact future District activities or interferes with the Project alignment, the pipeline would be removed and legally disposed of by the Project contractor.

Excavation permits will be required from the County prior to the start of construction for work within Gopher Canyon Road and Fairview Drive. Work within the intersection of Gopher Canyon Road and Fairview Drive will be coordinated with the County to determine if night work will be required for this Project alignment crossing and the connection to the existing 8-inch AC water pipeline.

Traffic control would be required along the northern portion of the Project alignment along Gopher Canyon Road and Fairview Drive. Traffic control requirements would be coordinated with the San Diego County Department of Public Works and included in the Project specifications. The selected Construction Contractor will be responsible for preparing traffic control plans for construction and obtaining required permits from the County of San Diego. The Contractor will also be responsible for obtaining coverage under the General Construction Stormwater Permit 2022-0057-DWQ (adopted September 8, 2022).

Construction of the proposed Project is anticipated to start in the second quarter of 2024 and take approximately nine (9) months to complete. The pipeline shall be installed via open trench construction; installation and trench backfill shall conform to the requirements of District Standard Drawing W-17 and W-18.

During the construction of each phase, the contractor will erect a temporary construction fence around the area affected by that stage. The fence is intended to keep the public out of the areas of work for their own safety. Material and construction equipment staging is anticipated to occur within the 20 foot easement area within Bonsall Farms.

Pipeline replacement is anticipated to require the use of the equipment shown on **Table 2**.

TABLE 2 POTENTIAL CONSTRUCTION EQUIPMENT

Equipment
– Bore/Drill Rigs – Concrete/Industrial Saw – Trencher – Skid Steer Loader – Rollers – Sweepers/Scrubbers – Tractors/Loaders – Backhoe – Crew trucks – 10-wheel dump truck

Not all construction equipment would be operating simultaneously. All construction-related activities would be conducted between the hours of 7:00 a.m. and 4:00 p.m., Monday through Friday, with no construction on Saturdays, Sundays or holidays (County of San Diego Noise Abatement and Control Ordinance, County Code of Regulatory Ordinances, Title 3, Division 6, Chapter 4, January 2009). Construction to cross Gopher Canyon will likely be at night, which will require a variance from the County Noise Ordinance.

Noise Control Measures

The project would implement the following noise control measures during construction to minimize potential annoyance to nearby residences to the extent possible:

- All noise-producing project equipment and vehicles using internal-combustion engines will be equipped with mufflers, air-inlet silencers where appropriate, and any other shrouds, shields, or other noise-reducing features in good operating condition that meet or exceed original factory specifications. Mobile or fixed "package" equipment (e.g., arc welders, air compressors) will be equipped with shrouds and noise-control features that are readily available for that type of equipment.
- All mobile or fixed noise-producing equipment used on the project that are regulated for noise output by a local, state, or federal agency shall comply with such regulations while in the course of project activity.
- Electrically powered equipment will be used instead of pneumatic or internal combustion- powered equipment, where feasible.
- Material stockpiles and mobile equipment staging, parking, and maintenance areas will be located as far as practicable from noise-sensitive receptors.
- The use of noise-producing signals, including horns, whistles, alarms, and bells, will be for safety warning purposes only.
- No project-related public address or music system will be audible at any adjacent receptor.

Dust Control Measures

The Project would implement various construction dust control strategies as design features to be compliant with SDAPCD Rule 55. Compliance with these dust control measures are listed as follows and would be identified on grading plan approvals:

- During clearing, grading, earth-moving, excavation, or transportation of cut or fill materials, water trucks, sprinkler systems or hand watering shall be used to prevent dust from leaving the site and to create a crust after each day's activities cease;
- During construction, water trucks, sprinkler systems or hand watering shall be used to keep all areas of vehicle movement damp enough to prevent dust from leaving the site. At a minimum, this would include wetting down such areas later in the morning, after work is completed for the day, and whenever winds exceed 15 mph during active operations. Watering of active disturbance areas, including active grading areas and unpaved roads, would occur approximately every 2 hours of active operations, approximately two times per work day (at a minimum);

- Speeds on unpaved roads shall be reduced to less than 10 miles per hour;
- All grading and excavation operations shall be halted when wind speeds exceed 25 miles per hour;
- Dirt and debris spilled onto paved surfaces at the project site and on the adjacent roadways shall be swept, vacuumed, and/or washed at the end of each workday; and
- All trucks hauling dirt, sand, soil, or other loose material to and from the construction site shall be covered and/or a minimum 2 feet of freeboard shall be maintained.

Construction of the project would require excavation of soils to an approximate depth of five (5) feet below ground surface (bgs). Dewatering during construction would not be required because groundwater in the area occurs at approximately 16.5 feet bgs.

Excavated soils would be temporarily stored adjacent to the pipeline alignment within the construction easement area (NV5, 2021b; Appendix D). As each segment of pipe is replaced, the excavated soils would be replaced over the new pipeline and the surface would be graded and restored to its preconstruction condition.

Traffic control will be required along the northern portion of the Project alignment along Gopher Canyon Road and Fairview Drive. Traffic control requirements will be coordinated with the San Diego County Department of Public Works and included in the Project specifications. The selected Project contractor will be responsible for preparing traffic control plans for construction and obtaining required permits from the County of San Diego.

Wherever feasible and consistent with public and worker safety at least one traffic lane will be maintained in operation during construction. Flaggers will be provided as needed to provide for the safety of motorists, pedestrians and bicyclists. Pedestrian and bicyclist detours will be used if needed to provide for safe passage around the construction area. Contractors will be required to comply with part 6 of the California Manual on Uniform Traffic Control Devices (Caltrans, 2012a) regarding proper placement and usage of traffic controls. Pedestrians and bicyclists will be diverted around the project site during construction.

2.5 Potential Cumulative Projects

Cumulative impacts are defined in State CEQA Guidelines Section 15355 as “two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.” A cumulative impact occurs from “the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time” (State CEQA Guidelines Section 15355[b]).

Consistent with State CEQA Guidelines Section 15130, the discussion of cumulative impacts in this Draft EIR focuses on significant and potentially significant cumulative impacts. Section 15130(b) of the State CEQA Guidelines provides, in part, the following:

Section 15130 of the State CEQA Guidelines requires a discussion of cumulative impacts, and determination of the project's contribution to identified cumulative impacts. The project's contribution must be viewed when added to the effects of past projects, the effects of other current projects and the effects of reasonably foreseeable future projects. The individual projects included in the cumulative impact assessment are described on **Table 3**.

TABLE 3. POTENTIAL CUMULATIVE PROJECTS

Project Name	Applicant	Location	Description	Status
Las Posas Water Main Replacement (1)	Vallecitos Water District	Las Posas Road, between Linda Vista Drive and Stone Drive	Replacement of water main underneath a double reinforced box culvert (RBC) with a new parallel PVC water main in a steel casing and reconnect to existing asbestos-cement pipe on either side of the double RBC.	Construction estimated to start March 2024; and end Aug. 2024
Wuff Waterline Improvements (1)			Installation of new 8-inch pressure regulating valve to allow the water level in the Wulff Tank to be regulated from the High Point hydro-pneumatic pump station pressure zone.	Construction estimated to start April 2024; and end Dec. 2024
Richland I Tank Exterior Refurbishment (1)	Vallecitos Water District	West of Woodland Parkway	Refurbishment of tank's exterior coating.	Construction estimated to start April 2024; and end June 2024

Source: Vallecitos Water District Capital Projects Quarterly Update Board Meeting First Quarter – FY 2023/2024.

3.0 SUMMARY OF ANALYSIS

The Vallecitos Water District (District) finds that the proposed Tres Amigos Waterline Replacement Project (Project or proposed Project) would not have a significant adverse effect on the environment, based on analysis provided in the Initial Study (Section 4.0) and the Discussion of Initial Study Environmental Checklist (Section 6.0). No impacts are anticipated to be significant after the proposed mitigation measures, presented in Section 10.0 of this Initial Study, have been incorporated into the project design. A Mitigated Negative Declaration (MND) is, therefore, proposed to satisfy the requirements of the California Environmental Quality Act (CEQA) (California Public Resources Code, Section 21000 et seq.; 14 CCR 15000 et seq.). This conclusion is supported by the following results.

1. ***Aesthetics:*** The proposed Project is an underground facility. Project implementation would not significantly affect scenic vistas, scenic resources, the visual quality of the site or its surroundings, or daytime or nighttime views (see Section 6.1*).*
2. ***Agriculture and Forestry Resources:*** Project implementation would not significantly affect agricultural resources (see Section 6.2).
3. ***Air Quality:*** Project implementation would not significantly affect ambient air quality, violate state and federal standards, or create objectionable odors (see Section 6.3).
4. ***Biological Resources:*** With implementation of mitigation measures MM-BIO-1, MM BIO-2 and MM BIO-3, impacts associated with temporary direct and indirect impacts to sensitive vegetation communities and species and conflict with any local policies, ordinances, or habitat conservation plans would be reduced to less than significant. Potential impacts to breeding birds would be avoided through implementation of Mitigation Measure BIO-3 (see Section 6.4).
5. ***Cultural Resources:*** Although the likelihood of encountering isolated archaeological resources along the propped alignment site is very low, due to previous grading and construction-related ground disturbance, mitigation measures MM CUL-1 through MM CUL-5 shall be implemented in the unlikely event the proposed construction activities encounter remains. With mitigation, Project implementation would not cause a substantial adverse change in the significance of a historical or archaeological resource and would not disturb any human remains (see Section 6.5).
6. ***Energy:*** Construction and operation of the Project would not result in a significant impact associated with the wasteful, inefficient, and unnecessary consumption of energy. Overall, the Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency; therefore, impacts during construction and operation of the Project would be less than significant (see Section 6.6).
7. ***Geology and Soils:*** Project impacts relative to geology and soils, including paleontological resources, would be less than significant (see Section 6.7); however because obtaining

coverage under the General Construction Activities Stormwater Permit and preparation of Stormwater Pollution Prevention Plan is required for all projects that disturb more than one-acre, the project incorporates mitigation measure MM-GEO-1.

8. ***Greenhouse Gas Emissions:*** The Project would not generate a substantial amount of GHG emissions and would not exceed the 900 MT CO2E screening threshold for GHG emissions and would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases. Impacts would therefore be less than significant (see Section 6.8).
9. ***Hazards and Hazardous Materials:*** The Project would not introduce significant amount of hazardous materials to people or to the environment (see Section 6.9). Impacts are considered to be less than significant.
10. ***Hydrology and Water Quality:*** The Project would not result in significant impacts to hydrology and water quality after the implementation of best management practices (BMPs) required per the Project's Stormwater Pollution Prevention Plan (SWPPP) (see Section 6.10). The site specific SWPPP will be prepared under the National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities.
11. ***Land Use and Planning:*** The Project would not divide an established community and would be consistent with the General Plan and the Bonsall Community Plan. No land use impacts would occur (see Section 6.11).
12. ***Mineral Resources:*** Project implementation would not affect mineral resources (see Section 6.12).
13. ***Noise:*** Once constructed, operation of the new pipeline would not generate noise. Construction will be restricted to the hours of 7:00 a.m. and 7:00 p.m., Monday through Saturday. Noise impacts will be temporary and with adherence to the County's Noise Ordinance would be less than significant. If nighttime construction is required, the District or its construction contractor shall obtain a variance from the County of San Diego, the issuance of which will be evidence that temporary nighttime construction noise impacts would be reduced to below a level of significance. If a variance cannot be obtained, nighttime construction shall not be allowed (see Section 6.13).
14. ***Population and Housing:*** The Project would not significantly affect local housing availability or result in unplanned growth (see Section 6.14).
15. ***Public Services:*** The Project would not induce population growth nor result in the need for enhancements to public services such as schools, parks, and libraries. Therefore, no impacts to public services would occur (see Section 6.15).
16. ***Recreation:*** The Project would not generate population that would increase the demand for parks, nor would it disturb existing parks or other recreational facilities. Pedestrians and

bicyclists would be diverted around the area during construction. Impacts to recreational resources would be less than significant (see Section 6.16).

17. ***Transportation:*** The Project would not significantly affect transportation or traffic patterns. Construction of the Project would not result in a permanent increase to the vehicle miles traveled (VMT) in the area and therefore would be consistent with CEQA Guidelines, Section 15064.3(b). The Project would not generate substantial traffic trips, and appropriate traffic control plans would be prepared and implemented by the construction contractor. Transportation impacts would be less than significant (see Section 6.17).
18. ***Tribal Cultural Resources:*** With the implementation of mitigation measures MM CUL-1 through MM CUL-5, Project implementation would not cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074. Mitigation Measures MM CUL-4 (Disposition of Tribal Cultural Resources) and MM CUL-5 (Prepare Final Monitoring Report and/or Evaluation Report) were incorporated into the Project as a result of the District's consultation with the Rincon Band of Luiseño Indians (see Section 6.18).
19. ***Utilities and Service Systems:*** Project implementation would result in a short-term minimal increase in the demand for water, (during construction only), and would not significantly adversely affect utilities and service systems; therefore, impacts would be less than significant (see Section 6.19).
20. ***Wildfire:*** Implementation of the Project would not impair an adopted emergency response plan or emergency evacuation plan, would not exacerbate wildfire risk and would not expose people or structures to significant wildfire risks. Impacts would be less than significant (see Section 6.20).
21. ***Mandatory Findings of Significance:*** All potentially significant impacts to biological resources would be reduced to a level below significance with incorporation of mitigation measures MM BIO-1, MM BIO-2 and MM BIO-3. Additionally, potential impacts to cultural and tribal cultural resources would be reduced to a level below significance with incorporation of mitigation measures MM CUL-1 through MM CUL-5. The Project would not contribute to a cumulative impact. Lastly, there is no substantial evidence that the Project, with the proposed mitigation measures incorporated, would result in a substantial adverse effect on human beings.

4.0 INITIAL STUDY

1. Project Title:

Tres Amigos Waterline Replacement Project

2. Lead Agency Name and Address:

Vallecitos Water District
201 Vallecitos de Oro
San Marcos, California 92069

3. Contact Person and Phone Number:

Mr. Ryan Morgan, Senior Engineer
Telephone: 760.744.0460
Email: rmorgan@vwd.org

4. Project Location:

Bonsall USGS Quadrangle Section 5 Township 11S Range 3W

5. Project Sponsor's Name and Address:

Vallecitos Water District
201 Vallecitos de Oro
San Marcos, California 92069

6. General Plan Designation:

Semi-Rural Residential (SR-2 and SR-4). The SR-2 designation allows rural residential development with maximum allowable densities that ranging from 1 dwelling unit (DU) per 1, 2 or 4 gross acres, depending on the slope of the area (County of San Diego, 2021). The SR-4 designation allows rural residential development with maximum allowable densities that range from 1 DU per 4, 8 and 16 gross acres, depending on the slope of the area (County of San Diego, 2021).

7. Zoning:

Limited Agriculture (A70). The A70 Use Regulations are intended to create and preserve areas intended primarily for agricultural crop production. Use types permitted within the A70 zone include single-family residences, essential services [2], fire protection services and agricultural uses including horticulture (all types), tree crops, row and field crops.

[2] Essential Services are those which are necessary to support principal development and involve only minor structures, such as utility lines and/or poles (SDCMC §1335).

8. Description of Project:

Please see Section 2.0 for Project Description.

9. Surrounding Land Uses and Setting:

The proposed alignment is surrounded by low density rural residential uses, intensive agriculture including orchards, and vacant undeveloped land. Parcels affected by the Project are presented on **Table 1**.

10. Other Required Public Agency Approvals:

- County of San Diego Excavation Permit for work within Gopher Canyon Road and Fairview Drive
- County of San Diego Noise Variance for nighttime construction.

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

On April 28, 2022, a sacred lands search was requested from the Native American Heritage Commission (NAHC) to request a search of their Sacred Lands File (SLF) and a list of Native American contacts who may know areas of cultural concern, such as traditional cultural places, sacred sites, archaeological sites, or cultural landscapes that may exist within one mile of the proposed pipeline alignment

Based on the NAHC's Native American Contact List, on October 3, 2023, the District sent letters to 29 California Native American Tribes or Tribal Representatives with historical and traditional ties to the project area . The letters provided a brief description of the Project, its location, and lead agency contact information. The letter also requested a written response from the Tribe or Representee noting their desire to consult on the Project. Copies of the letters are provided in Appendix C-2 of this Initial Study. As of the date of this report, the District has entered into formal consultation with three (3) Native American Tribes (See Appendix C-3).

5.0 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

☐	Aesthetics	☐	Agriculture & Forestry	☐	Air Quality
☒	Biological Resources	☒	Cultural Resources	☐	Energy
☐	Geology /Soils	☐	Greenhouse Gas Emissions	☐	Hazards & Hazardous Materials
☒	Hydrology / Water Quality	☐	Land Use / Planning	☐	Mineral Resources
☒	Noise	☐	Population / Housing	☐	Public Services
☐	Recreation	☐	Transportation	☒	Tribal Cultural Resources
☐	Utilities / Service Systems	☐	Wildfire	☒	Mandatory Findings of Significance

DETERMINATION:

On the basis of this initial evaluation:

☐ I find that the proposed Project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☒ I find that although the proposed Project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the proposed Project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed Project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed Project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed Project, nothing further is required.

Mr. Ryan Morgan, P.E., Senior Engineer
Vallecitos Water District

Date:

6.0 EVALUATION OF ENVIRONMENTAL IMPACTS:

1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2) All answers take account the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analyses," as described in (5) below, may be cross-referenced).

5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:

   a) Earlier Analysis Used. Identify and state where they are available for review.

   b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

   c) Mitigation Measures. For effects that are "Less than Significant with Mitigation Measures Incorporated," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7) Supporting Information Sources: A source list should be attached, and other sources used, or individuals contacted should be cited in the discussion.

8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.

9) The explanation of each issue should identify:

   a) The significance criteria or threshold, if any, used to evaluate each question; and

   b) The mitigation measure identified, if any, to reduce the impact to less than significance.

The following provides a discussion of the environmental impacts that are anticipated to occur as a result of the construction proposed Tres Amigos Waterline Replacement Project (Project or proposed Project). This section provides the Initial Study Checklist and a brief explanation for the checklist answers. Mitigation measures for those impacts that are less than significant when mitigation measures are incorporated are described briefly in this section.

6.1. AESTHETICS

Except as provided in Public Resources Code Section 21099, would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b) Substantially damage scenic resources, including, but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☒	☐
c) Substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

Existing Setting

The proposed pipeline alignment is located within the San Diego County Community of Bonsall, with the nearest segment location approximately1.05 miles southeast of State Route 76 (SR-76). The proposed alignment travels in generally a north/south direction with east/west extensions at the northern and southern terminuses. The alignment generally travels along Ormsby Way, across Gopher Canyon Road, along Fairview Drive with a small extension onto Carrio Drive. Public views of the Project site would be from these roadways.

The proposed replacement pipeline alignment would be approximately 1.82 miles in length and would traverse 12 privately owned parcels. Land uses within and surrounding the proposed alignment include intensive agricultural uses and field crops, County of SD rights of way, rural residences, and vacant undeveloped land.

The County's General Plan Conservation and Open Space Element does not specifically list or identify any designated scenic vistas; however, the General Plan does discuss the County's three distinctive geographic regions including the low-lying coastal plain, mountainous peninsular range, and Desert Salton Basin which provide an array of natural vistas and scenic environments. Additionally, many public trails that may provide scenic views are located throughout the County (County of San Diego, 2011). Scenic resources in the Bonsall Community Planning area include, but are not limited to, steep slopes, ridgelines, panoramic views, I-15 Corridor, Mission Road (State Route 76), San Luis Rey River, San Marcos Mountains, and Merriam Mountain (County of San Diego, 2011). None of these resources occur within the view shed of the Project.

According to the California State Scenic Highway Mapping System (Caltrans, 2023), State Route 76 is the nearest officially designated state scenic highway.

a) Less Than Significant. Scenic vistas consist of expansive, panoramic views of important, unique, or highly valued visual features that are seen from public viewing areas. This definition combines visual quality with information about view exposure to describe the level of interest or concern that viewers may have for the quality of a particular view or visual setting. The Bonsall Community Plan identifies scenic resources including steep slopes, ridgelines, panoramic views, I-15 Corridor, Mission Road (State Route 76), San Luis Rey River, San Marcos Mountains, and Merriam Mountain. The County's General Plan Conservation and Open Space Element does not specifically list or identify any designated scenic vistas. The San Diego County General Plan EIR, Section 2.01 Aesthetics, identifies Gopher Canyon and San Marcos Mountains as resource conservation areas in the Bonsall Community Planning Area.

Construction of the Project would affect the visual environment during trenching, pipeline installation, views of large construction equipment and on-site storage of equipment and materials; however, although views may be altered, the Project is not located in an area that contains scenic vista from which temporary construction activities would be visible construction would be short term and temporary. All construction equipment would be removed from the project site upon completion of the Project, and the pipeline would be placed underground and would not be visible. Therefore, impacts to scenic vistas would be less than significant, and no mitigation is required.

b) Less Than Significant. There are no scenic resources, including, but not limited to trees, rock outcroppings, and historic buildings within the project area. The project would not cause substantial long-term damage to scenic resources because it would be placed underground and would not be visible after construction.

The nearest eligible state scenic highway is Route 76, located approximately1.05 miles northwest from the nearest alignment segment. The waterline would not be visible from the highway due to distance, the intervening hilly terrain, and existing development. Therefore, the Project would have less than significant impacts on scenic resources and no mitigation would be required.

c) Less Than Significant. For the reasons described under Issues 6.1.a) and 6.1.b) herein, the Project would not substantially degrade the existing visual character or quality of the area and its surroundings. Impacts would be less than significant and no mitigation would be required.

d) Less Than Significant. Construction activities are generally expected to be conducted during daylight hours. Nighttime construction may be required for that portion of the pipeline that would be installed within the intersection of Gopher Canyon Road and Fairview Drive to minimize traffic disruptions. During nighttime work, the construction crews would only use the minimum illumination needed to perform the work safely. All construction lighting would be directed downward and shielded to focus illumination on the desired work areas only. All lighting would conform to applicable County of San Diego rules and regulations for outdoor lighting. The impacts caused by this temporary lighting would be less than significant due to their short duration and no mitigation would be required.

Mitigation

No mitigation would be required.

Cumulative Impacts

The Tres Amigos Waterline Replacement Project would be installed underground, and no long-term visual impacts would occur. Temporary impacts during construction could occur due to nighttime lighting. The Project would conform to applicable County of San Diego rules and regulations for outdoor lighting, minimizing the potential cumulative impacts to aesthetic resources. Therefore, the Project's contribution to cumulative aesthetic impacts would not be cumulatively considerable.

6.2 AGRICULTURAL AND FOREST RESOURCES

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☒	☐
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☒	☐

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

Existing Setting

All parcels along the proposed alignment are zoned A70, for agricultural uses and APNs 170-170-27, 170-170-34, and 170-170-35 are currently under active agricultural production (Bonsall Farms). According to the California Department of Conservation's Farmland Mapping and Monitoring Program, the proposed alignment travels through land classified as "Other Lands," "Unique Farm Lands," "Farmlands of Local Importance," and "Farmlands of Statewide Importance."

The proposed alignment does not contain forest lands (as defined in Public Resources Code section 12220(g)); timberland (as defined by Public Resources Code section 4526); and, timberland zoned Timberland Production (as defined by Government Code section 51104(g)).

a) Less Than Significant. Although the project traverses farmland mapped as "Unique" or of Local and Statewide importance, it would not result in the conversion of important farmland because the replacement pipeline would be installed in trenches, with disturbed areas restored upon completion of construction. The District will coordinate with Bonsall Farms to schedule construction through the farm properties during periods that will not impact growing operations.

The Project would not result in the long-term conversion of important farmlands to non-agricultural use. Therefore, impacts would be less than significant and no mitigation would be required.

b) Less Than Significant. The project traverses land zoned by the County as Limited Agriculture (A70) and contains no Williamson Act contracts. The A70 zone permits essential civil use services,

which include water distribution lines. Therefore, construction of the project would not create conflicts with existing zoning for agricultural use or property under a Williamson Act contract, and no impact would result. No mitigation would be required.

c and d) No Impact. No forest land, timberland, or Timberland Production lands, as defined in the code sections listed above, occur within the Project area. Therefore, no impact would occur and no mitigation would be required.

e) No Impact. As discussed in Sections 6.2(a) through 6.2(d), implementation of the Project would not involve other changes in the existing environment that, due to their location or nature, could result in the conversion of farmland to non-agricultural use or conversion of forest land to nonforest use. No impact would occur and no mitigation would be required.

Mitigation

No mitigation would be required.

Cumulative Impacts

The proposed Project would not conflict with any existing zoning for agricultural use, Williamson Act contracts or other changes to the environment resulting in conversion of farmland to non-agricultural use or forestland or timberland to non-forest use, no cumulative impacts would result. Therefore, the Project's contributions to cumulative impacts to agricultural resources would not be cumulatively considerable.

6.3 AIR QUALITY

Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

An Air Quality and Greenhouse Gas Analysis (Birdseye Consulting Group, 2023; Appendix A) was prepared for the proposed Project to assess potential air quality impacts and greenhouse gas emissions. The analysis contained in this section is based on the findings of that technical report.

Existing Setting

The Project site is located in the San Diego Air Basin (SDAB) and is subject to the San Diego County Air Pollution Control District (SDAPCD) guidelines and regulations. The weather of San Diego County is profoundly influenced by the Pacific Ocean and its semi-permanent high-pressure systems that result in dry, warm summers and mild, occasionally wet winters. The average minimum temperature for January ranges from the mid-40s to the high-50s degrees Fahrenheit (4 to 15 degrees Celsius) across the county. July maximum temperatures average in the mid-80s to the high-90s degrees Fahrenheit (high-20s to the high-30s degrees Celsius). Most of the county's precipitation falls from November to April, with infrequent (approximately 10 percent) precipitation during the summer. The average seasonal precipitation along the coast is approximately 10 inches (254 millimeters); the amount increases with elevations as moist air is lifted over the mountains.

The SDAPCD is required to monitor air pollutant levels to ensure that air quality standards are met and, if they are not met, to develop strategies to meet the standards. Depending on whether the standards are met or exceeded, the local air basin is classified as being in "attainment" or "non-attainment." San Diego County is listed as a federal non-attainment area for ozone (eight hour) and a state non-attainment area for ozone (one hour and eight-hour standards), PM10 and PM2.5. The SDAB is in attainment for the state and federal standards for nitrogen dioxide, carbon monoxide, sulfur dioxide and lead.

Sensitive Receptors Sensitive receptors include, but are not limited to, hospitals, schools, daycare facilities, elderly housing and convalescent facilities. These are areas where the occupants are more susceptible to the adverse effects of exposure to air pollutants. Ambient air quality standards have been established to represent the levels of air quality considered sufficient, with an adequate margin of safety, to protect public health and welfare as well that segment of the public most susceptible to respiratory distress, such as children under 14; the elderly over 65; persons engaged in strenuous work or exercise; and people with cardiovascular and chronic respiratory diseases. Nearby sensitive receptors are residences located adjacent to the proposed alignment.

Methodology and Significance Thresholds

Air quality modeling for the Project was performed in general accordance with the methodologies outlined in the SDAPCD 2016 RAQS to identify Project-related construction emissions. All emissions were calculated using the California Emissions Estimator Model (CalEEMod) software version 2020.4.0 which incorporates current air emission data, planning methods and protocol approved by CARB. The modeling assumed that All construction would occur within or adjacent to existing road corridors or within disturbed alignments. The disturbances would be limited to the construction phase and all disturbed areas would be restored to preconstruction conditions. It is assumed that material and equipment would be staged within the inactive portions of the Bonsall Farms property.

Appendix G of the CEQA Guidelines (14 CCR 15000 et seq.) indicates that, where available, the significance criteria established by the applicable air quality management district or pollution control district may be relied upon to determine whether the project would have a significant impact on air quality. As part of its air quality permitting process, SDAPCD has established thresholds in Rule 20.2 requiring the preparation of Air Quality Impact Assessments for permitted stationary sources. SDAPCD sets forth quantitative emission thresholds for stationary sources. Although these trigger levels do not generally apply to mobile sources or general land development projects, for comparative purposes these levels may be used to evaluate the increased emissions that would be emitted into the SDAB from proposed land development projects. Project-related air quality impacts estimated in this environmental analysis would be considered significant if any of the applicable significance thresholds presented below in **Table 4** are exceeded.

The thresholds listed in **Table 4** are screening-level thresholds used to evaluate whether proposed-project-related emissions could cause a significant impact on air quality. Emissions below the screening-level thresholds would not cause a significant impact. The emissions-based thresholds for ozone precursors (ROG and NOx) are intended to serve as the threshold for ozone. This approach is used because ozone is not emitted directly; thus, ozone concentrations associated with individual projects precursors (VOC and NOx) emissions cannot be determined through air quality models or other quantitative methods. For nonattainment pollutants, if emissions exceed the thresholds shown in **Table 4**, the project has the potential to result in a cumulatively considerable net increase in these pollutants; and thus, could have a significant impact on the ambient air quality.

With respect to odors, SDAPCD Rule 51 (Public Nuisance) prohibits emission of any material that causes nuisance to a considerable number of persons or endangers the comfort, health, or safety of any person. A project that involves a use that would produce objectionable odors would be deemed to have a significant odor impact if it would affect a considerable number of off-site receptors.

TABLE 4. SAN DIEGO APCD SIGNIFICANCE THRESHOLDS

Criteria Pollutant	Total Emissions (pounds per day)
Reactive Organic Gases (ROGs)	75
Nitrogen Oxides (NOx)	250
Carbon Monoxide (CO)	550
Sulfur Oxides (SOx)	250
Respirable Particulate Matter (PM10	100
Fine Particulate Matter (PM2.5)	67

Source: Birdseye Planning Group, 2023 (Appendix A).

a) Less Than Significant. The Project site is within the SDAB, the boundaries of which are contiguous with San Diego County. Within San Diego County, the SDAPCD has primary responsibility for the development and implementation of rules and regulations designed to attain national ambient air quality standards (NAAQS) and California ambient air quality standards (CAAQS), as well as the permitting of new or modified sources and the development of air quality management plans. Projects that propose development that is consistent with the growth anticipated by the relevant planning documents used in the formulation of the RAQS and SIP would be consistent with the RAQS and SIP.

As stated, under state law, the SDAPCD is required to prepare an Air Quality Management Plan (AQMP) for pollutants for which the SDAB is designated non-attainment. Each iteration of the SDAPCD's AQMP is an update of the previous plan and has a 20-year horizon. A project may be inconsistent with the AQMP if it would generate population, housing, or employment growth exceeding forecasts used in the development of the AQMP. The 2016 AQMP, the most recent AQMP adopted by the SCAQMD, incorporates local city General Plans and the San Diego Association of Governments socioeconomic forecast projections of regional population, housing and employment growth. The proposed project involves the installation of a new water pipeline segment. The project would not generate housing, jobs or other long-term emission sources or otherwise cause operational air impacts. Therefore, the Project would have no effect on SANDAG's population growth forecast and would not conflict with the SIP and RAQS. The Project would be consistent with the AQMP Impacts under this criteria would be less than significant and no mitigation would be required.

b) Less Than Significant. San Diego County is designated as a federal non-attainment area for ozone (eight hour) and a state non-attainment area for ozone (one hour and eight-hour standards), PM10 and PM2.5. These designations are a result of emissions generated by past and present projects and will continue to be influenced by reasonably foreseeable future projects. Cumulative impacts would result if the Project exceeds established thresholds for pollutants in which the region is nonattainment. In addition, cumulative impacts would result if the proposed Project would be

constructed at the same time as other development projects in the area, thereby exposing sensitive receptors to cumulative emission concentrations.

Table 5 summarizes the estimated maximum daily emissions of pollutants occurring during the construction. As shown in **Table 5**, construction of the proposed Project would not exceed the SDAPCD regional construction emission thresholds for daily emissions. Thus, the project construction would not conflict with the SIP, RAQS or AQMP, violate an air quality standard or contribute to an existing or projected violation, result in a cumulatively considerable increase in ozone or particulate matter emissions or expose receptors to substantial pollutant concentrations.

TABLE 5. ESTIMATED MAXIMUM MITIGATED DAILY CONSTRUCTION EMISSIONS

Construction Phase	Estimated Maximum Emissions (lbs./day)					
	ROG	NOx	CO	SOx	PM10	PM2.5
2024 Maximum lbs./day	2.5	21.0	26.1	0.06	1.06	.09
SDAPCD Regional Thresholds	75	250	550	250	100	67
Threshold Exceeded	**No**	**No**	**No**	**No**	**No**	**No**

Source: Birdseye Consulting Group, 2023 (Appendix A).

The Project would be required to comply with SDAPCD Rules 52 and 54 which identify measures to reduce fugitive dust and is required to be implemented at all construction sites located within the SDAB. The following best management practices shall be shown on all applicable grading and building plans as details, notes, or as otherwise appropriate:

- Minimization of Disturbance. Construction contractors should minimize the area disturbed by clearing, grading, earth moving, or excavation operations to prevent excessive amounts of dust.
- Soil Treatment. Construction contractors should treat all graded and excavated material, exposed soil areas and active portions of the construction site, including unpaved on-site roadways to minimize fugitive dust. Treatment shall include, but not necessarily be limited to, periodic watering, application of environmentally safe soil stabilization materials, and/or roll compaction as appropriate. As referenced, watering would be implemented for dust control. Watering will be performed as often as necessary, and at least twice daily, preferably in the late morning and after work is done for the day. Note – it was assumed watering would occur two times daily for modeling purposes.
- Soil Stabilization. Construction contractors should monitor all graded and/or excavated inactive areas of the construction site at least weekly for dust stabilization. Soil stabilization methods, such as water and roll compaction, and environmentally safe dust control materials shall be applied to portions of the construction site that are inactive for over four days. If no further grading or excavation operations are planned for the area, the area shall

be seeded and watered until landscape growth is evident, or periodically treated with environmentally safe dust suppressants, to prevent excessive fugitive dust.

- No Grading During High Winds. Construction contractors should stop all clearing, grading, earth moving, and excavation operations during periods of high winds (20 miles per hour or greater, as measured continuously over a one-hour period).
- Street Sweeping. Construction contractors should sweep all on-site driveways and adjacent streets and roads at least once per day, preferably at the end of the day, if visible soil material is carried over to adjacent streets and roads.

The Project would be subject to the conditions noted above to minimize construction emissions and therefore would not negatively impact regional air quality. Operational emissions would be minor and would not contribute to any significant cumulative impacts related to the nonattainment status for ozone, PM10, or PM2.5. Some of cumulative projects listed on **Table 3** could be constructed concurrent with the proposed Project. Possible cumulative impacts on air quality as a result of construction activities in the area would be addressed by compliance with SDAPCD rules and regulations, which apply to all construction projects. Therefore, project construction and operation would not result in a cumulatively considerable net increase in emissions. This impact would be less than significant.

c) Less Than Significant. The closest properties defined as receptors are residences are adjacent to the proposed alignment.

The greatest potential for toxic air contaminant emissions would be related to diesel particulate emissions associated with heavy equipment operations during construction. According to South Coast Air Quality Management District's (SCAQMD) methodology, health effects from carcinogenic air toxics are usually described in terms of "individual cancer risk." The California Office of Environmental Health Hazard Assessment health risk guidance states that a residential receptor should be evaluated based on a 30-year exposure period. "Individual Cancer Risk" is the likelihood that a person exposed to concentrations of toxic air contaminants over a 70-year lifetime will contract cancer, based on the use of standard risk-assessment methodology. Construction is expected to last 9months. This is much shorter than the assumed 30 or 70-year exposure period used to estimate lifetime cancer risks.

Construction activities would be sporadic, transitory and short-term in nature. Diesel activity occurring on site would be short-term and at distances that would not expose sensitive receptors to substantial pollutant concentrations. Therefore, the Project would not expose sensitive receptors to substantial pollutant concentrations. This impact would be less than significant and no mitigation would be required.

d) Less Than Significant. Potential sources of odors during construction activities include diesel exhaust from construction equipment and diesel vehicles. These odors would not affect a

substantial number of people; would occur periodically and dissipate as a function of distance from the source and would be lower at the nearest sensitive receptors; and would end when construction is completed. Therefore, the proposed Project's odor impact would be less than significant and no mitigation would be required.

Mitigation

No mitigation would be required.

Cumulative Impacts

Cumulative impacts are addressed under Item 6.3(b) above.

6.4 BIOLOGICAL RESOURCES

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☒	☐
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☒	☐

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☒	☐	☐
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☒	☐	☐

A Biological Impact Analysis Letter Report was prepared for the Project to assess potential impacts to sensitive biological resources (Merkel & Associates, 2023; Appendix B). The analysis contained in this section is based on the findings of that technical report.

Existing Setting

The Project is located within Bonsall, a semi-rural area, characterized topographically by a series of hills, valleys, and drainage areas. Land uses that dominate the community are active agricultural as well as low density estate type residential with limited areas of dense residential. The Biological Study Area (BSA) consisted of the project footprint (20-foot wide easement) plus a 100-foot mapping and habitat evaluation buffer. South of Gopher Canyon Road the BSA includes Bonsall Farms, an active agricultural operation of mostly row crops, as well as limited low density estate type residential. North of Gopher Canyon Road, the BSA is comprised of low density estate type residential with some orchard crops. The local biological environment is presented on **Figures 6a and 6b**, ***Local Environmental Map***.

No blue-line features (i.e., drainage, creek, streams, etc.) as identified by the USGS topographic quadrangle map and/or USFWS National Wetland Inventory (NWI) occur within the BSA. Gopher Canyon Creek occurs offsite, approximately 1,926 feet (0.36 miles) north of the BSA and is separated from the BSA by mostly undeveloped/preserved open space. Additionally, no floodplain or floodway have been mapped within the BSA.

Federally designated critical habitat for the federally listed threatened coastal California Gnatcatcher (*Polioptila californica californica*) occurs within the BSA (**Figure 6a**). The western boundary of the critical habitat encroaches into the BSA at the northern extent of the proposed alignment where is abuts undeveloped/preserved open space. The critical habitat encroaches into the BSA by approximately 170 feet.

Biological Survey

A general biological survey was conducted on May 5, 2022, within the biological study area (BSA) which consisted of the project footprint (20-foot wide easement) plus a 100-foot mapping and habitat evaluation buffer. Concurrent with the general biological survey, a directed survey/assessment for potentially present special status species (i.e. federally and state listed species; California Department of Fish and Wildlife (CDFW) Species of Special Concern (SSC) Fully Protected (FP), and Watch List (WL) species; and species designated as Special Plants or Special Animals in the CNDDB[3]. A literature review was also conducted to identify special-status plant and wildlife species that could potentially occur inside the BSA.

Jurisdictional Resources

Potential jurisdictional resources within the BSA consist of two ephemeral drainages in Bonsall Farms and one drainage at the intersection of Gopher Canyon Road and Fairview Drive (See **Figures 7a and 7b**). Lastly, a small culvert and concrete lined channel were identified at the northern limit of Fairview Drive. These features are expected to be regulated by USACE and/or RWQCB as non-wetland waters of the U.S. and by the CDFW as unvegetated streambed based on their potential connection to Gopher Canyon Creek and/or the San Luis Rey River.

Special Status Species

No special status species, coastal including California gnatcatcher, were detected within the BSA and there are no public records of special status species within the BSA.

Wildlife species noted during the biological survey consisted of species commonly found in native and naturalized habitats throughout San Diego County many of which are year-round residents. A list of the faunal species observed or detected within the BSA during the biological survey has been included in Appendix B.

Overall, mostly bird species were detected during the biological survey. Commonly observed species observed included red-tailed hawk (*Buteo jamaicensis*) (two adults and one juvenile), black phoebe (*Sayornis nigricans*), California towhee (*Melozone crissalis*), house finch (*Haemorhous mexicanus*), and western meadowlark (*Sturnella neglecta*). While no active avian nests were observed, all these species have a potential to nest within the BSA throughout Bonsall Farms (e.g., shade trees, staging areas in equipment or throughout the weeds) and the rural residential areas.

Red-shouldered hawk (*Buteo lineatus*) and turkey vulture (*Cathartes aura*) were observed flying over the northern portion of the BSA; however there is no suitable nesting habitat for these raptor species within the BSA.

3 CNDDB = California Natural Diversity Database

a) Potentially Significant Unless Mitigation Incorporated.

Direct Impacts

The proposed alignment passes through active agriculture, rural residential development, and paved roadways. Eight (8) vegetation communities were mapped within the BSA: Diegan Coastal Sage Scrub, Southern Mixed Chaparral, Non-Native Grassland, Eucalyptus Woodland, Disturbed Habitat, Urban/Developed, Orchards/Vineyards, and Row Crops (See **Figures 7a and 7b** and **Table BIO-1**). Diegan Coastal Sage Scrub, Southern mixed chaparral and non-native grassland are considered sensitive vegetation communities.

TABLE 6. HABITAT/VEGETATION COMMUNITIES WITHIN THE BSA, PROJECT IMPACTS & MITIGATION

Vegetation Community	Existing Acreage	Temporary Impact (acre)	Mitigation Ratio (1)	Mitigation Required (acre)
Diegan Coastal Sage Scrub	0.11	0.00	NA	NA
Southern Mixed Chaparral	1.51	0.06	0.5:1	0.03
Non-Native Grassland	1.11	0.04	0.5:1	0.02
Eucalyptus Woodland	1.00	0.18	None	NA
Disturbed Habitat	3.22	0.42	None	NA
Urban/Developed	15.00	1.54	None	NA
Orchards/Vineyards	1.80	0.13	None	NA
Row Crops	17.72	1.76	None	NA
TOTAL	**41.47**	**4.13**		**0.05**

Notes:
(1) Habitat-based mitigation could occur via purchase of available credits from an approved mitigation bank and/or onsite restoration. If credits are purchased, mitigation ratio per this column would be required.
NA = Project would not impact; no mitigation required.

Source: Merkel & Associates, 2023 (Appendix B).

Construction of the Project would temporary impact a total of 4.13 acres, including 0.06 acres of southern mixed chaparral and 0.04 acres of Non-native grassland, which would be considered significant. No impacts would occur to Diegan coastal sage scrub. Implementation of habitat-based mitigation in accordance with mitigation measure **MM-BIO-1** would be required to reduce impacts to a level below significance.

Impacts to eucalyptus woodland, disturbed habitat, orchard/vineyards, and row crops would be considered less than significant since these habitats are not regionally considered to have high conservation value requiring mitigation.

Indirect Impacts

Project construction could result in indirect impacts as a result of erosion and/or to sensitive resources adjacent to the project footprint. Implementation of mitigation measure **MM BIO-2** would reduce the potential indirect impacts to less than significant.

Project implementation of mitigation measure MM-BIO-1 would ensure the replacement of impacted habitat, either through the purchase of offsite habitat credits from a resource-agency approved mitigation bank or through onsite restoration. Mitigation measure MM-BIO-2 would require implementation of construction impact control measures. Therefore, significant impacts related to vegetation communities would be reduced to a level less than significant.

Special Status Species. Implementation of the Project is not expected to impact any special status species since none were detected onsite and since none have a moderate or high potential to occur onsite.

Indirect temporary impacts may occur on breeding birds, which can be significantly affected by short-term construction-related noise through the temporary disruption of foraging, nesting, and reproductive activities. Nesting birds may be present within the project footprint, most notably within the southern mixed chaparral and non-native grassland during construction. Indirect temporary impacts to active migratory bird nests, if present at the time of construction are prohibited under the federal Migratory Bird Treaty Act (MBTA) and California Fish and Game Code §3503 and §3513. Indirect impacts from construction-related noise may occur on breeding wildlife if construction occurs during the breeding season (i.e., February 15 through August 31 for most bird species and January 1 through August 31 for raptors). This would be considered a significant impact. Implementation of MM BIO-3 would be required to reduce this impact to less than significant.

b) Less Than Significant Impact. As identified in the Biological Resources Letter Report and as shown on **Figures 7a** and **7b**, potential jurisdictional resources regulated by the USACE, RWQCB, and/or CDFW are located within the project footprint. However, these potential resources would not be impacted by the Project. In addition, implementation of **MM BIO-2** would ensure compliance with the project design. If the District determines that impacts to potential jurisdictional resources are necessary for implementation of the Project, a formal aquatic resources delineation may be required to confirm jurisdiction. In addition, applicable authorizations/permits from the USACE, RWQCB, and/or CDFW would be required.

Thus, jurisdictional resources would not be impacted as a result of the Project and impacts would be less than significant.

c) No Impact. No federally protected wetlands as defined by Section 404 of the Clean Water Act exist within the BSA. The Project would not have any direct or indirect impact on federally protected wetlands. Therefore, there would be no impact and no mitigation would be required.

d) Less Than Significant. Wildlife movement corridors are defined as areas that connect suitable wildlife habitat areas in a region otherwise fragmented by rugged terrain, changes in vegetation, or human disturbance. Natural features such as canyon drainages, ridgelines, or areas with vegetation cover provide corridors for wildlife travel. Wildlife movement corridors are important because they provide access to mates, food, and water; allow the dispersal of individuals away from high population density areas; and facilitate the exchange of genetic traits between populations.

The BSA does not support these features and as such, is not expected to serve as a wildlife corridor. While the habitat within the BSA likely provides coverage, foraging and breeding opportunities for urban tolerant species, the BSA is not expected to serve as a nursey site for special status species. Therefore, impacts regarding interference with wildlife movement corridors or use as a nursery site would be less than significant.

f) Less than Significant with Mitigation Incorporated. Installation of the replacement pipeline would occur within District easements and would avoid ornamental trees along the proposed alignment and temporary disturbed areas would be restored upon completion of construction. This would be consistent with the Bonsall Community Plan Policy COS-1.3.1, which encourages the protection of all sensitive lands and habitat as identified by federal, State, and County guidelines such as oak and willow riparian, coastal, and Diegan sage scrub, native grasslands and wetlands (County of San Diego, 2011). The project would also be consistent with Policy COS-1.1.1, which states "Encourage the preservation of all areas of critical habitat identified under the Multiple Species Conservation Program in their natural state, allowing for maintenance and/or management for fire safety."

The avoidance, minimization, and MM BIO-1, MM-BIO-2 and MM BIO-3 would reduce potentially significant impacts to sensitive plant and wildlife species, sensitive vegetation communities, and jurisdictional resources to a less than significant level. Overall, impacts are considered less than significant.

f) Less than Significant with Mitigation Incorporated. The Multiple Habitat Conservation Program (MHCP) is a comprehensive, multiple jurisdictional planning program designed to develop an ecosystem preserve in San Diego County. Implementation of the regional preserve system is intended to protect viable populations of key sensitive plant and animal species and their habitats, while accommodating continued economic development and quality of life for residents of the North County region. The North County MHCP, adopted and certified by the SANDAG Board of Directors on March 28, 2003, extends the County's MHCP program into the northwestern areas of the County. The Project site is located within the Bonsall area of the MSCP.

The avoidance, minimization, and MM BIO-1, MM-BIO-2 and MM BIO-3 would reduce potentially significant impacts to sensitive vegetation communities and species covered under the North County MSCP. Because the Project would not contribute to the loss of sensitive vegetation

or sensitive species with implementation of project mitigation measures, potentially significant impacts would not occur from conflicts with regional conservation plans.

Mitigation

MM BIO-1: Southern Mixed Chaparral and Non-Native Grassland Mitigation

Temporary impacts to 0.06 acre of southern mixed chaparral and 0.04 acre of non-native grassland shall be mitigated at a ratio of 1:1, as shown on **Table 6**. Impacts to disturbed habitat would either be mitigated via onsite restoration (details provided in a restoration construction sheet) or via acquisition of offsite habitat credits from a resource-agency approved mitigation bank at a 0.5:1 ratio, with the bank preferably within the same watershed as the Project (e.g., North County Habitat Bank).

- If onsite restoration is selected, revegetation shall occur via planting and hydroseed application throughout the disturbed areas and a 36-month monitoring period or until the success criteria are achieved. The details of the revegetation should be presented within a revegetation construction sheet(s). Two plant palettes shall be required, one for revegetation of impacted areas of southern mixed chaparral and one for impacted areas of non-native grassland.

- A native erosion control seed mix (e.g., S&S Seeds Basic Native Erosion Control Mix) may be used to restore areas of non-native grassland. All native seed/plants should be from seed and propagules collected within the local San Diego region, as close to the site as possible.

- Maintenance and monitoring shall be implemented by a qualified Restoration Contractor with oversight by a Restoration Specialist and should occur as needed until the success criteria are achieved.

- Success criteria should include at minimum, the following: coverage by native species is consistent with coverage in the adjacent, non-impacted habitat and invasive plant species[4] should be absent from the revegetation area.

- Following achievement of the success criteria, a memo documenting the status of the revegetation area should be prepared and submitted by the Restoration Specialist to the District.

4 Invasive plant species include any species identified as having a High inventory rating by California Invasive Plant Council (Cal-IPC) and any nuisance plant causing potential detriment to native flora and/or fauna as determined by the Restoration Specialist.

- The revegetation sheet should include the following: 1) purpose and location of the revegetation areas, 2) success criteria and remedial measures, 3) schedule for maintenance, monitoring, and reporting, 4) planting palette, 5) site preparation, 6) installation procedures, 7) supplemental irrigation if determined necessary, and 8) maintenance requirements.

- The Revegetation Contractor should have the minimum qualifications: 1) three years of local, verifiable experience in maintenance and monitoring involving resources similar to those onsite; 2) ability to carry out maintenance and monitoring as required; and 3) applicable licenses to implement maintenance.

MM BIO-2: Indirect Impact Mitigation

During construction, impacts to regionally sensitive habitats adjacent to the project limit of work may occur if not effectively controlled through project design and construction monitoring and management actions. To mitigate impacts to adjacent habitats, the following impact control measures are recommended:

- Temporary perimeter fencing should be installed when adjacent to sensitive resources consisting of the southern mixed chaparral, non-native grassland, and potential jurisdictional resources. A biologist, approved by the District should oversee installation of the temporary fencing.

- The biologist should also conduct the following: provide environmental training to the construction crew to notify them of the sensitive resources in the area; be onsite during the initial clearing of habitat and excavation work when adjacent to the sensitive resource areas; conduct weekly inspections during excavation work to ensure general biological compliance; and prepare a post-construction memo for the District, documenting compliance with the biological conditions imposed on the project. The biologist should have the authority to halt construction activities, if needed and should report any violation to the District within 48 hours of detection.

- Construction techniques and BMPs should be developed for the project to prevent encroachment into potential jurisdictional resources and to prevent erosion and/or export of sediment from the site during storm events.

- BMPs proposed for the project should not include any species listed by the California Invasive Plant Council (Cal-IPC) in the California Invasive Plant Inventory.

- Temporary lighting during night-time construction, if needed, shall be downcast/fully shielded and directed away from adjacent habitat.

MM BIO-3: Conduct Pre-Construction Surveys for Coastal California Gnatcatchers, Raptors and Migratory Birds.

Construction shall be timed to avoid the breeding season for coastal California gnatcatcher (March 1 to August 15) and other avian species protected by the MBTA and CFGC (February 15 to August 31). If construction activities are to take place during the combined bird breeding season (i.e., February 15 through August 31 for most bird species and January 1 through August 31 for raptors), the following measures shall be implemented as follows:

a. Pre-construction surveys shall be conducted for coastal California gnatcatcher by a qualified biologist with experience performing protocol surveys for the species. A total of two survey visits should be performed, including one within seven days of the start of construction. If no gnatcatchers are detected within 300 feet of the project impact areas, no additional measures will be needed for this species. If coastal California gnatcatchers are detected, no construction may occur within 300 feet of occupied habitat until the end of the breeding season.

b. A pre-construction clearance survey within the impact area shall be conducted for other avian species protected by the MBTA and CFGC Sections 3503 and 3503.5. This could be conducted concurrently with the pre-construction survey in MM-BIO-3(a) or separately. If no nesting birds are detected in the impact area, no additional measures would be required. If nesting birds are detected within the impact area, a construction avoidance buffer would be required around the nest to ensure no construction activities may occur within the buffer until the end of the breeding season or after the nest is no longer active. The radius of the avoidance buffer would be determined based on the species and location of the nest.

c. If nests of any species are detected during the pre-construction surveys described in Recommendation 3(b), a biological monitor shall be retained to monitor construction when activities would occur adjacent to the avoidance buffer. The biological monitor shall make periodic (i.e., weekly) site visits to inspect the nest and determine whether it is active. Note that active coastal California gnatcatcher nests may only be inspected by a biologist with a coastal California gnatcatcher nest monitoring permit from USFWS.

With implementation of **MM BIO-3**, no significant impacts to coastal California gnatcatcher or other avian species would occur.

Cumulative Impacts

In conjunction with other development projects in the project vicinity (Table 3), the Project would not have a cumulatively considerable impact on biological resources.

6.5 CULTURAL RESOURCES

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	☐	☒	☐	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to State CEQA Guidelines § 15064.5?	☐	☒	☐	☐
c) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☒	☐	☐

ASM Affiliates (ASM) completed a *Cultural Resources Study for the Tres Amigos Waterline Replacement Project* on July 6, 2022, to assess potential impacts to cultural resources and is included as Appendix C (ASM 2022; Appendix C).

Existing Setting

The Project's Area of Potential Effects (APE) [5] [6], consists of all areas of ground disturbance along the proposed pipeline alignment plus a 20-foot buffer. For most Project components, the vertical depth of disturbance is expected be no more than 5 feet below the ground surface.

A records search was completed on April 28, 2022 for the Project APE at the South Coastal Information Center (SCIC) of the California Historical Resources Information System at San Diego State University. A search of the Sacred Lands File held by the NAHC was requested on April 28, 2022. The search was undertaken to supplement the SCIC records search to inquire as to whether resources important to local Native American groups may exist within the project area. A response was received from the NAHC on June 9, 2022, which was negative for specific site

[5] The "area of direct and indirect impacts" to cultural resources under CEQA is identical to the area referred to under Section 106 of the National Historic Preservation Act as the Area of Potential Effect.
[6] A project's APE is "the geographic area or areas within which an undertaking may cause changes to the cultural resources, as well as in the character or use of historic properties, if any such properties exist" (36 Code of Federal Regulations [CFR] 800.2(c)).

information within the one-mile search radius. The NAHC provided a tribal consultation list that identified 29 Native American Tribes and tribal representatives (See Appendix C-2).

The SCIC records search identified a total of 85 cultural resource surveys that were previously been completed within 1.0 mile of the APE, five of which intersect the Project APE.

CHRIS records indicate the presence of 19 previously recorded cultural resources within a 1-mi. radius of the Project area. None of the previously recorded cultural resources intersect the Project area. One historic address was identified as occurring within the 1-mi. records search radius, but it does not intersect the proposed Project area.

A pedestrian field survey of the APE was conducted on May 5, 2022 to determine the presence of any previously undocumented cultural resources. The Project area, including a 20-ft. buffer around the proposed waterline replacement, was surveyed at approximately 5 meter (m) interval transects apart. No prehistoric materials were identified on the ground surface within the Project APE as a result of the cultural resources survey. One piece of amethyst glass was identified on a dirt road running through the strawberry fields. Amethyst glass was produced from approximately 1880 to 1917. The isolate shard is out of context with no additional associated artifacts and is thus categorically not eligible for listing in the California Register of Historical Resources (CRHR).

a, b, and c). Less Than Significant with Mitigation Incorporated. According to the SCIC records search 19 previously documented resources are located within a 1- mile radius the APE; however, none of the previously recorded cultural resources intersect the Project area. Additionally, no cultural resources were observed during the archaeological survey of the Project APE except for a single amethyst glass shard, which is categorically not eligible for listing in the CRHR.

Although the likelihood of encountering isolated archaeological resources along the propped alignment site is very low, due to previous grading and construction-related ground disturbance, mitigation measures MM CUL-1 through MM CUL-5 shall be implemented to ensure that unanticipated buried cultural material is adequately recorded and evaluated should it be encountered during the installation of the pipeline.

Mitigation

MM CUL-1: Construction Monitoring for Unanticipated Discoveries.

The project's grading and construction plans and specifications shall state that full-time monitoring by a qualified archaeologist shall be conducted during the initial grubbing and ground disturbance for the Project. The project archaeologist, in coordination with the District, may re-evaluate the necessity for monitoring after the initial five feet of excavations have been completed. In the event that archaeological resources are inadvertently discovered during ground-disturbing

activities, work must be halted within 50 feet of the find until it can be evaluated by a qualified archaeologist. Construction activities could continue in other areas. If the discovery proves to be significant, additional work, such as data recovery excavation or fossil recovery, may be warranted and would be discussed in consultation with the appropriate regulatory agency(ies).

Native American tribes shall be given the opportunity to provide one or more certified cultural monitors for the Project during all excavation or earth-moving within the Project site in Holocene-aged deposits. The Construction Contractor shall give the tribe's Historic Preservation Officer (THPO) or other designated representative two weeks' notice and shall provide a copy of such notice to the District.

MM CUL-2: Human Remains.

Procedures of conduct following the discovery of human remains on non-federal lands have been mandated by California Health and Safety Code §7050.5, California Public Resources Code §5097.98, and California Code of Regulations (CCR) §15064.5(e). Should human remains be encountered, all work in the immediate vicinity of the burial must cease, and any necessary steps to ensure the integrity of the immediate area must be taken. The San Diego County Coroner will be immediately notified. The Coroner must then determine whether the remains are Native American. If the Coroner determines the remains are Native American, the Coroner has 24 hours to notify the NAHC, who will, in turn, notify the person they identify as the most likely descendent (MLD) of any human remains. Further actions will be determined, in part, by the desires of the MLD. The MLD has 48 hours to make recommendations regarding the disposition of the remains following notification from the NAHC of the discovery. If the MLD does not make recommendations within 48 hours, the owner shall, with appropriate dignity, reinter the remains in an area of the property secure from further disturbance. Alternatively, if the owner does not accept the MLD's recommendations, the owner or the descendent may request mediation by the NAHC.

MM CUL-3: Avoid Potential Effects on Undiscovered Burials.

The District shall implement the following measures to reduce or avoid impacts related to undiscovered burials. In accordance with the California Health and Safety Code, if human remains are uncovered during ground-disturbing activities, all potentially damaging ground-disturbance in the area of the burial and a 100-foot radius shall halt and the San Diego County Coroner shall be notified immediately. The coroner is required to examine all discoveries of human remains within 48 hours of receiving notice of a discovery on private or state lands (Health and Safety

Code Section 7050.5[b]). If the coroner determines that the remains are those of a Native American, then Federal laws governing the disposition of those remain would come into effect. Specifically, the Native American Graves Protection and Repatriation Act (NAGPR).

California law also recognizes the need to protect Native American human burials, skeletal remains, and items associated with Native American burials from vandalism and inadvertent destruction. The District shall ensure that the procedures for the treatment of Native American human remains contained in California Health and Safety Code Sections 7050.5 and 7052 and Public Resources Code Section 5097 are followed.

MM CUL-4: Disposition of Tribal Cultural Resources.

The landowner shall relinquish ownership of all tribal cultural resources collected during the cultural resource mitigation monitoring conducted during all ground disturbing activities, and from any previous archaeological studies or excavations on the Project site to the TCA tribe for respectful and dignified treatment and disposition, including reburial, in accordance with the Tribe's cultural and spiritual traditions. All cultural materials that are associated with burial and/or funerary goods will be repatriated to the Most Likely Descendant as determined by the Native American Heritage Commission per California Public Resources Code Section 5097.98.

MM CUL-5: Prepare Final Monitoring Report and/or Evaluation Report.

Prior to the release of the Grading Bond and no later than 90 days after monitoring has been completed, a Monitoring Report and/or Evaluation Report shall be completed. This report shall describe the results, analysis and conclusions of the cultural resource mitigation monitoring efforts (such as, but not limited to, the Research Design and Data Recovery Program). It will also include a list of project personnel, a catalog of any cultural resources that were identified, any associated DPR 523 Forms and/or confidential maps, details of the location of the final disposition of cultural resources (if any), any issues or problems that occurred during monitoring, and any other pertinent information. The Monitoring Report shall be submitted by the project archaeologist, along with the notes and comments from the TCA Native American Monitor(s), to the Vallecitos Water District for review and approval. Upon approval by the Lead Agency, a complete final report shall be submitted to the appropriate Information Center, the Rincon Band of Luiseño Indians, any relevant curation facility, and the landowner/applicant.

Cumulative Impacts

The proposed Project would not contribute to any cumulative permanent adverse impacts on cultural resources. No undeveloped land would be developed by the proposed Project.

6.6 ENERGY

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VI. ENERGY -				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

Methodology

This analysis assumes that energy (i.e., fuel) would only be required during installation/ construction of the replacement pipeline. This analysis also assumes that diesel fuel would be used by off-road construction equipment and material delivery trucks. On-road vehicles for construction worker trips are assumed to be solely powered by gasoline. Diesel and gasoline fuel consumptions were calculated using the CO_2 emissions contained in the *Air Quality Technical Report for the Tres Amigos Waterline Replacement Project,* which is provided as Appendix A of this MND, and EPA's default emission rates of 19.4 pounds of CO_2 per gallon of gasoline and 22.2 pounds of CO_2 per gallon of diesel.

Electricity and natural gas are not expected to be consumed in large quantities during construction, as construction equipment and vehicles are not powered by electricity or natural gas. For this reason, electricity and natural gas consumption were not calculated.

a) Less Than Significant. The proposed Project would not result in any potentially significant environmental impact(s) due to wasteful, inefficient or unnecessary consumption of energy during project construction. Construction equipment and haul trucks would consume fuel during the construction process; however, the electricity used for construction activities would be temporary and minimal.

Construction

Electricity and natural gas are not expected to be consumed in large quantities during construction, as construction equipment and vehicles are not powered by electricity or natural gas. Based on these considerations, the Project would have a less than significant impact on electricity and natural gas consumption.

Construction would, however, result in fuel consumption from the use of construction tools and equipment, and vehicle trips generated from construction workers traveling to and from the site. Project construction is expected to consume a total of approximately 1220 gallons of diesel fuel from construction equipment and vendor hauling and water trips at associated and approximately 1400 gallons of gasoline from construction worker vehicle trips. Construction activities and corresponding fuel energy consumption would be temporary and localized as the use of diesel fuel in heavy equipment would not be a typical condition of the Project.

Limitations on idling of vehicles and equipment and requirements that equipment be properly maintained would result in fuel savings. California regulations (13 CCR 2449[d][3], 2485) limit idling from both on-road and off-road diesel-powered equipment and are enforced by the California Air Resources Board. Also, given the high cost of fuel, contractors and owners have a strong financial incentive to avoid wasteful, inefficient, and unnecessary consumption of energy during construction. Therefore, construction of the Project would not result in a significant impact associated with the wasteful, inefficient, and unnecessary consumption of energy.

Operation

Operation of the pipeline would not require the use of energy. The pipeline would be a passive, gravity-fed pipeline. Future maintenance operations would be like existing conditions in the area and would not result in the need for additional maintenance trips. Operational use of energy resources would be less than significant.

b) Less Than Significant. The proposed Project entails the replacement of existing waterlines. Thus, the Project is not designed to facilitate or encourage renewable energy project development and would not impede the development of renewable energy projects. Construction of the proposed Project would involve energy for use of construction equipment and transportation (e.g., worker vehicles and haul trips). These uses would involve a standard amount of energy resources similar to other construction activities. Overall, the Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency; therefore, impacts during construction and operation of the Project would be less than significant.

Mitigation

No mitigation would not be required.

Cumulative Impacts

The proposed Project would not result in direct or indirect significant environmental impacts due to wasteful, inefficient or unnecessary consumption of energy resources. Therefore, the Project's contributions to cumulative energy impacts would not be cumulatively considerable.

6.7. GEOLOGY AND SOILS

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42?	☐	☐	☒	☐
ii) Strong seismic ground shaking?	☐	☐	☒	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv) Landslides?	☐	☐	☒	☐
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☒	☐

A Geotechnical Investigation Report was prepared for the Project to assess potential geotechnical and seismic impacts (NV5, 2021b; Appendix D). The analysis contained in this section is based on the findings of that technical report.

Existing Setting

The project site is located in the vicinity of Gopher Canyon Road and East Vista Way near Vista in San Diego County, California. The anticipated depth of cover over the existing pipeline is generally three to four feet with as much as eight feet where the pipeline exits Ormsby Way back to Bonsall Farms. Topography along the project alignment consists of rolling hills with the alignment rising and falling between a high of approximately 582 feet above mean sea level (MSL) near the southern end of the pipeline and a low of approximately 431 feet above MSL near the north end of the pipeline. Grades along the alignment range from relatively flat near the topographic highs and lows to approximately 17 percent on the slope north of Carrio Drive.

The subsurface conditions at the project site were explored on September 8th, 2021 by drilling, logging and sampling a total of six (6) exploratory borings (B-1 through B-6) with depths ranging from 12 to 16.5 feet below ground surface (bgs). The approximate locations of the exploratory borings are shown on Figure 2, Exploration Location Map, of Appendix D. Groundwater was not encountered during the boring.

a.i) Rupture from known earthquake fault – No Impact. Review of geologic maps and literature pertaining to the general site area indicates that the site is not located within a state-designated Earthquake Fault Zone. Review of the State of California, *Special Studies Zones* indicates that the project site does not lie within an identified earthquake fault zone. In addition, there are no known major or active faults mapped along the Project alignment. Evidence for active faulting at the site was not observed during the subsurface investigation. The nearest traces of surface rupture along major active earthquake fault zones that could affect the site are from the Newport Ingelwood Connected, which is 13 miles from the site.

a.ii) Strong Seismic Shaking - Less Than Significant Impact. Though the potential for damaging earthquakes in the project area is lower than is typical of Southern California, the threat of a severe earthquake occurring that would result in strong earth shaking at the project site remains. However, Project design is subject to engineering design standards that consider the likelihood of seismic conditions. The replacement waterline would be constructed to the standards

of the most recent California Building Code, including seismic structural requirements. Compliance with these requirements would reduce the potential risk to both people and structures with respect to strong seismic ground shaking. As part of the project design process, continued geotechnical investigations would be performed to inform final design of the project relative to potential geotechnical risks. Therefore, impacts would be less than significant.

a.iii) Seismic-related ground failure, including liquefaction - Less-than-Significant Impact. Liquefaction occurs when a buildup of pore water pressure in the affected soil layer to a point where a total loss of shear strength may occur during a seismic event, causing the soil to behave as a liquid. Liquefaction is generally known to occur in saturated cohesionless soils at depths shallower than approximately 50 feet. The alignments of the proposed water pipelines and improvements are underlain by moderately to intensely weathered granitic rock. The water table is interpreted to be over 60 feet bgs across the project area. Therefore, the potential for liquefaction is not anticipated to be a design consideration (Appendix D). The project would not increase the risk from seismic-related ground failure impacts, including liquefaction. Therefore, impacts would be less than significant.

a.iv) Landslides - Less-than-Significant Impact. Landslides typically occur on moderate to steep slopes that are affected by such physical factors as slope height, slope steepness, shear strength, and orientation of weak layers in the underlying geologic units contribute to landslide susceptibility. There are no large steep slopes on or in close proximity to the project alignment. Based on the investigation and NV5's review of published maps and aerial photography, there appears to be no indications of landslides or deep-seated instability in the project area. It is NV5's opinion that the potential damage to the planned improvements due to landsliding or slope instability is considered low (Appendix D). Therefore, impacts would be less than significant.

b) Substantial soil erosion or the loss of topsoil - Less-than-Significant Impact. Project-related ground disturbance would be subject to the District's standard construction BMPs, as stated in Section 2.4 of the Initial Study, and comply with existing regulatory requirements and standards related to geology and soils, both of which would serve to limit the potential for erosion and loss of topsoil. This includes preparation and implementation of a SWPPP in compliance with the Construction General Permit (2022-0057-DWQ; adopted September 8, 2022) to minimize the potential of sedimentation and soil erosion as described in MM GEO-1.

The BMPs and regulatory requirements would minimize and reduce potential for soil erosion and the loss of topsoil from the relatively small areas that would be temporarily disturbed during construction.

Postconstruction stabilization of all temporary work areas, as is required to close out the project's SWPPP, would return sites to their pre-project conditions and prevent erosion in the long term. Therefore, impacts would be less than significant.

c) Located on a geologic unit or soil that is unstable - Less than Significant Impact. As discussed previously in (a)(iii) and (a)(iv), no active earthquake faults are identified as occurring on or directly adjacent to the project site. The nearest known active fault is the La Nacion fault zone, approximately 13 miles from the project site (Appendix D). Additionally, the project does not propose the development of buildings or structures and, therefore, would not expose people or structures to impacts related to seismic ground shaking or be located on an unstable geologic unit. Additionally, the project site is not within an area of high liquefaction potential or within a landslide hazard area. Therefore, impacts related to on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse would be less than significant.

d) Expansive soils – Less than Significant Impact. The project site is underlain predominantly by weathered granitic rock at depth (Appendix D). A representative sample of the fill and colluvial soils overlying the granitic rock in boring B5 was tested for expansion potential and was found to have "medium" expansion potential. These materials are generally considered unsuitable for use as structural fills, backfill of pipeline trenches, temporary excavations, or other underground structures. Materials which are considered unsuitable shall be excavated under the observation of the geotechnical consultant in accordance with the recommendations contained within the Geotechnical Report. Therefore, impacts related to expansive soils creating substantial direct or indirect risks to life or property would be less than significant.

e) Soils incapable of adequately supporting the use of septic tanks - No Impact. The project would not involve the use of septic tanks or alternative wastewater disposal systems. Therefore, no impact would occur.

f.) Destroy a unique paleontological resource or site or unique geologic feature - Less Than Significant. The project alignment is underlain by the Meta sedimentary (Mzu) and the Tonalite (Kt) units. The District's service area contains one geologic unit of high paleontological sensitivity: the Santiago formation which is located along the southern portion of the VWD service area's western boundary (VWD, 2019). Because the Project would not be located within a geologic unit of high paleontological sensitivity, it is not expected to contain recoverable paleontological resources and impacts would be less than significant.

Mitigation

Though no significant geology and soils impacts have been identified, compliance with the requirement to obtain coverage under the General Stormwater Construction Permit is included as mitigation measure MM GEO-1.

MM GEO-1: Obtain Coverage under the General Activities Stormwater Permit/ Prepare and Implement a Stormwater Pollution Prevention Plan. District or its approved construction contractor shall file a Notice of Intent (NOI) with the San Diego Regional Water Quality Control Board, to discharge in compliance with the statewide National Pollutant Discharge Elimination

System (NPDES) Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Order 2022-0057-DWQ). A certified Qualified SWPPP Developer (QSD) shall prepare a Storm Water Pollution Prevention Plan (SWPPP) and implement associated Best Management Practices (BMPs) that are specifically designed to reduce construction-related erosion. Impacts would be less than significant with mitigation incorporated.

Cumulative Impacts

The Project poses no potentially significant project specific geohazard or erosion impacts; therefore, potential cumulative impacts would not be cumulatively considerable.

6.8 GREENHOUSE GAS EMISSIONS

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b) Conflict with an applicable plan or policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

An Air Quality and Greenhouse Gas Analysis (Birdseye Consulting Group, 2022; Appendix A) was prepared for the proposed Project to assess potential air quality impacts and greenhouse gas emissions. The analysis contained in this section is based on the findings of that technical report, which also presents the regulatory framework for greenhouse gas emissions and climate change

Existing Setting

Certain gases in Earth's atmosphere, classified as greenhouse gases (GHGs), play a critical role in determining Earth's surface temperature. A portion of the solar radiation that enters the atmosphere is absorbed by Earth's surface, and a smaller portion of this radiation is reflected toward space. This infrared radiation (i.e., thermal heat) is absorbed by GHGs within the atmosphere; therefore, infrared radiation released from Earth that otherwise would have escaped back into space is instead "trapped," resulting in a warming of the atmosphere. This phenomenon, known as the "greenhouse effect," is responsible for maintaining a habitable climate on Earth.

Without the naturally occurring greenhouse effect, Earth would not be able to support life as we know it. However, GHG emissions associated with human activities are likely responsible for

intensifying the greenhouse effect and have led to a trend of unnatural warming of Earth's atmosphere and oceans, with corresponding effects on global circulation patterns and climate.

GHGs are present in the atmosphere naturally; are released by natural and anthropogenic (human-caused) sources; and are formed from secondary reactions taking place in the atmosphere. The following are GHGs that are widely accepted as the principal contributors to human-induced global climate change:

- carbon dioxide (CO2)
- hydrofluorocarbons
- methane (CH4)
- nitrous oxide (N2O)
- perfluorocarbons
- sulfur hexafluoride

Global warming potential (GWP) is a concept developed to compare the ability of each GHG to trap heat in the atmosphere relative to CO2. The concept of CO2 equivalents (CO2e) is used to account the different GWP potentials of GHGs to absorb infrared radiation. The GWP of a GHG is based on several factors, including the relative effectiveness of a gas in absorbing infrared radiation, and the length of time (i.e., lifetime) that the gas remains in the atmosphere ("atmospheric lifetime"). The reference gas for GWP is CO2; therefore, CO2 has a GWP of 1. The other main GHGs that have been attributed to human activity are CH4, which has a GWP of 21, and N2O, which has a GWP of 310. For example, 1 ton of CH4 has the same contribution to the greenhouse effect as approximately 21 tons of CO2. GHGs with lower emissions rates than CO2 still may contribute to climate change because they are more effective at absorbing outgoing infrared radiation than CO2 (i.e., high GWP).

Impacts of GHGs are borne globally, as opposed to localized air quality effects of criteria air pollutants and TACs. The quantity of GHGs that it takes ultimately to result in climate change is not known precisely; the quantity is enormous, and no single project alone would measurably contribute to a noticeable incremental change in the global average temperature, or to a global, local, or micro-climate. From the standpoint of CEQA, GHG- related effects to global climate change are inherently cumulative.

Climate Action Plan (CAP)

The District does not have a Climate Action Plan (CAP). Further, the County of San Diego does not have an approved CAP. However, on September 30, 2020, the County of San Diego Board of Supervisors voted to set aside its approval of the County's 2018 Climate Action Plan (2018 CAP) and related actions because the Final Supplemental Environmental Impact Report (2018 CAP SEIR) was found to be out of compliance with the California Environmental Quality Act (CEQA). In response to this Board action, staff are preparing a Climate Action Plan Update (CAP Update) to revise the 2018 CAP and correct the items identified by the Court within the Final 2018 CAP SEIR that were not compliant. The court ruling struck down part of the 2018 CAP's EIR but did

not find fault with its 26 GHG reduction measures. These measures continue to be implemented by the County to make progress toward mitigating climate change impacts in our community.

a) Less Than Significant. Because District and the County of San Diego do not have adopted thresholds, the GHG emissions are discussed in terms consistency with the approved SCAQMD threshold of 10,000 metric tons CO2E /year.

Construction-Related Impact

Project construction would generate short-term GHG emissions. Construction-related GHG emissions would be generated by vehicle engine exhaust from construction equipment, haul trips, and construction worker trips. GHG emissions generated by the proposed Project would consist primarily of CO2. Emissions of other GHGs, such as CH4 and N2O, are important with respect to global climate change; however, even when considering the higher GWPs of these other GHGs, their contribution to total GHG emissions is small compared with CO2 emissions from the proposed Project's emission sources (i.e., construction equipment and on-road vehicles). However, where appropriate emission factors were available, emissions of CH4 and N2O were included in the analysis of the proposed Project.

Based on CalEEMod results project construction would generate approximately 503 MT CO2e over the entire construction period, which would last up to 9 months. These emissions would include heavy-duty construction equipment, haul trucks, and construction worker vehicles. To estimate amortized construction emissions, the total construction-related GHG emissions of 503 MT CO2e associated with the Proposed project are divided by 30 years (approximately 17 MT CO2 per year).

As mentioned previously, many air districts recommend that construction-related GHG emissions be amortized over the lifetime of the project and compared to the thresholds of significance along with operational GHG emissions. Because the proposed Project would not include additional GHG emissions associated with operations, the amortized construction-related emissions of 17 MT CO2e need to be compared to any proposed or adopted GHG thresholds of significance. The amortized construction-related GHG emissions would be less than the adopted or proposed GHG levels or thresholds identified for SLOAPCD, SCAQMD, or SMAQMD as previously discussed. Therefore, the proposed Project would not generate GHG emissions, either directly or indirectly, that would have a significant impact on the environment. The impact would be less than significant. No mitigation is required.

Post-Project Operation-Related Impact

Project implementation would not require or result in substantial additional operational and maintenance activities above existing conditions. Therefore, impacts would be less than significant.

b) Less Than Significant.

Construction-Related Impact

None of the measures listed in CARB's Climate Change Scoping Plan (CARB 2008), which contains the main strategies that California would use to achieve emission reductions necessary to meet the goals of AB 32, relate directly to project construction activities. The scoping plan includes some measures that indirectly would address GHG emissions levels associated with construction activity, such as the phasing in of cleaner technology for diesel engine fleets (including construction equipment) and development of a low-carbon fuel standard. However, successful implementation of these measures primarily would depend on development of laws and policies at the State level. Those policies formulated under the mandate of AB 32 that would apply to project construction- related activity, either directly or indirectly, presumably would be implemented during project construction if those policies in fact are developed and adopted before the start of project construction. Therefore, Project construction is not expected to conflict with the scoping plan.

Post-Project Operation-Related Impact

Project implementation would not require or result in substantial additional operational and maintenance activities above existing conditions. Therefore, impacts would be less than significant.

Mitigation

No mitigation would be required.

Cumulative Impacts

Impacts of GHGs are borne globally, as opposed to localized air quality effects of criteria air pollutants and TACs. The quantity of GHGs that it takes ultimately to result in climate change is not known precisely; the quantity is enormous, and no single project alone would measurably contribute to a noticeable incremental change in the global average temperature, or to a global, local, or micro-climate. From the standpoint of CEQA, GHG-related effects to global climate change are inherently cumulative.

6.9 HAZARDS AND HAZARDOUS MATERIALS

Would the project:

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

Existing Setting

The SWRCB GeoTracker and the California Department of Toxic Substances Control (DTSC) EnviroStor database were searched to identify toxic releases, hazardous waste, or other violations

that would affect the Project site (SWRCB, 2023; DTSC, 2023). Properties along the proposed alignment are not listed as a hazardous waste site in either of these databases.

In addition, the EPA's Envirofacts database was searched. Envirofacts is an assemblage of databases, including the Comprehensive Environmental Response, Compensation, and Liability Act (commonly known as Superfund) Information System database, which includes National Priorities List sites being assessed under the Superfund program, hazardous waste sites, and potentially hazardous waste sites. Properties along the proposed alignment were not listed in the Envirofacts database (EPA, 2023).

Wildfire Risk and Response

PRC 4201-4204 and Government Code 51175-51189 require identification of fire hazard severity zones in California. CAL FIRE has established a fire hazard severity classification system. Fire hazard severity zones are measured qualitatively, based on vegetation, topography, weather, crown fire potential (a fire's tendency to burn upwards into trees and tall brush), ember production, and movement within the area being consumed.

Fire prevention areas considered to be under State jurisdiction are referred to as State Responsibility Areas (SRA). In such areas, CAL FIRE is required to delineate three hazard ranges: moderate, high, and very high. The Project alignment is within the San Diego County SRA and has been identified by CAL FIRE as being in a Moderate and Very High Fire Hazard Severity Zones (CAL FIRE, 2007).

Fire protection services for the Project site is provided by the Vista Fire Protection District. The Vista Fire Protection District provides fire suppression and prevention, rescue, emergency medical services, hazardous materials response services, administrative services, and disaster preparedness services. The station nearest to the Project site is Vista Fire Protection District Vista Fire Station 3, located at 1070 Old Taylor Street, approximately 1.02 miles south.

a) Less Than Significant.

Construction

Project construction would involve the storage, use, and transport of small amounts of hazardous materials (e.g., asphalt, fuel, lubricants, and other substances) on local roadways and regional highways. Regulations governing hazardous materials transport are stated in Title 22 of the California Code of Regulations and the California Vehicle Code (Title 13 of the California Code of Regulations). The transportation of hazardous materials also is subject to other local and federal regulations that have been designed specifically to minimize the risk of upset during routine construction activities. The State agencies with primary responsibility for enforcing federal and State regulations, and for responding to hazardous materials transportation emergencies, are the

California Highway Patrol and Caltrans. Together, these agencies determine container types to be used and license hazardous waste haulers for transportation of hazardous waste on public roads.

Implementation of a SWPPP in compliance with the Construction General Permit (Order No 2022- 057-DWQ, as amended) and standard construction best management practices (BMPs) would prevent the use of these materials from causing a significant hazard to the public or environment.

Operation

Once the replacement waterline is operational it would not differ from current operations. The waterlines would not utilize hazardous materials. No hazardous materials would be transported, used, or disposed of during operations.

Overall, the Project would result in less than significant hazards related to the routine transport, use, or disposal of hazardous materials.

b) Less Than Significant.

Construction

With the exception of construction-related materials such as fuels, lubricants, adhesives, and solvents, the proposed Project would not generate or require the use or storage of hazardous substances. As described in the previous response, hazardous materials used in construction of the facility would done in compliance with federal and State regulations that limit potential risks related to upset and accident conditions. In addition, no extremely hazardous substances would be used, stored, transported, or disposed of during Project construction. Implementation of a SWPPP and standard construction BMPs would minimize potential for accidental release of hazardous materials into the environment. Thus, impacts related to the release of hazardous materials during construction would be less than significant

Operation

Also, as described in the previous response, operation waterlines would not utilize hazardous materials. As such, impacts associated with a hazard to the public or the environment from the release of hazardous materials would not occur from operation of the Project.

c) No Impact. The nearest school within distance of the Project site is Palomar High School, located 1.52 miles south of the Project site. At the time of the Initial Study' publication, this school was temporarily closed. The Project is not located within 0.25 miles of a school and no impacts would occur.

d) No Impact. As verified by the California Department of Toxic Substances Control database, the Project sites are not included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. Thus, no impacts would occur.

e) No Impact. The closest airport with an airport land use compatibility plan is Fallbrook Community Airpark, located approximately 9.2 miles northwest of Project site. However, the Project is not located within the compatibility plan. Additionally, there are no public airports located within 2 miles of the Project site. Therefore, no impacts associated with public airport hazards would occur.

f) Less Than Significant. The Project includes construction work within the Gopher Canyon Road and Fairview Drive intersection, which would result in temporary traffic impacts. The construction would be scheduled during off-peak usage time to reduce potential traffic impacts. Traffic control requirements would be coordinated with the San Diego County Department of Public Works and included in the Project specifications. The selected Project contractor will be responsible for preparing traffic control plans for construction and obtaining required permits from the County of San Diego. Wherever feasible and consistent with public and worker safety, at least one traffic lane will be maintained in operation during construction. All routes would also remain fully accessible for emergency vehicles and would not interfere with emergency response or evacuation plans. Upon completion of construction, the Project work areas would return to similar pre-construction conditions. Therefore, implementation of the Project would not impair an adopted emergency response plan or emergency evacuation plan. Impacts would be less than significant.

g) Less Than Significant. The Project traverses an area within a Very High Fire Hazard Severity Zone (FHSZ) and a Moderate FHSZ. Potential wildland fire hazards would occur if the Project were to cause a wildland fire risk, increase wildland fire risk in the area, exacerbate the severity of a wildland fire, and/or exacerbate the severity of damage or hazards during a fire.

Project construction activities would result in an increase in the potential for accidental wildfires. Project construction would be conducted in accordance with local and state regulations governing fire prevention and safety, including 2022 California Fire Code Contractors would be required to comply with Sections 4422, 4428, 4431, 4435, 4436, 4442 and 4446 of the California Public Resources Code (PRC); during construction, they would be responsible for monitoring and implementing safety measures to prevent wildfires, in strict adherence to applicable PRC requirements.

Upon completion of construction, the Project would return to similar pre-construction conditions. Operation and maintenance of the Project would not substantially differ from existing practices and protocol. The proposed waterlines would not introduce new sources of ignition to the area. Therefore, the Project would not increase exposure to a significant risk of loss, injury or death involving wildland fires. Therefore, impacts would be less than significant.

Mitigation

No mitigation would be required.

6.10 HYDROLOGY AND WATER QUALITY

Would the project:

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	☐	☒	☐	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces in a manner which would:	☐	☐	☒	☐
i) result in substantial erosion or siltation on- or off-site;	☐	☐	☒	☐
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	☐	☐	☒	☐
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional resources of polluted runoff; or	☐	☐	☒	☐
iv) impede or redirect flood flows?	☐	☐	☒	☐
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☒	☐
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

a) Less than Significant With Mitigation Incorporated.

Construction

Construction of the Project would include earthwork activities that would result in erosion and sedimentation affecting downstream receiving waters and violate water quality standards. Substances such as oils, fuels, paints, and solvents may be inadvertently spilled on the Project locations where construction occurs and subsequently conveyed via stormwater to nearby drainages, watersheds, and ground water.

The National Pollutant Discharge Elimination System (NPDES) permit program was established to control water pollution by regulating point sources that discharge pollutants into Waters of the U.S. Pursuant to Section 402(p) of the Clean Water Act (CWA), which requires regulations for permitting of certain stormwater discharges, the SWRCB issued the statewide NPDES General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Order No 2022- 057-DWQ, as amended), which became effective on September 1, 2023.

Under this Construction General Permit, individual NPDES permits or Construction General Permit coverage must be obtained for discharges of stormwater from construction sites with a disturbed area of one or more acres and are required to either obtain individual NPDES permits for stormwater discharges or be covered by the Construction General Permit. Compliance with SWPPP requirements is incorporated into the project as MM GEO-1.

Pursuant to permit requirements, the applicant will be required to implement the BMPs outlined in the project's SWPPP, which would be implemented by MM GEO-1, which would limit the potential of construction-related pollutants in stormwater runoff. Compliance with this requirement would ensure that temporary water quality impacts associated with construction activities would be less than significant.

Operation

Upon completion, the new waterline will be rated for pressurized potable water systems and be constructed with newer materials, thereby reducing the risk of pipeline rupture. Therefore, upon Project completion, the proposed Tres Amigos Waterline Replacement would not violate any water quality standards and is not expected to create any discharges.

b) Less than Significant. The Project would require a temporary source of water during the construction. This limited use of water would not have the potential to substantially deplete groundwater supplies. Upon completion of construction, the Project would return to similar pre-Project conditions and would remain pervious. During operations the water pipeline will move water through the District service area, not requiring any additional water. Due to the negligible amount of water required for the Project and the lack of significant new impervious area, impacts

related to the depletion of groundwater supplies or interference with groundwater recharge would be less than significant.

c) Less than Significant. The Project site does not include a stream, river, or creek, and does not involve any substantial alteration to the drainage pattern of the area. Construction of the Project would result in a temporary increase in erosion and sedimentation from soil disturbance associated with grading and trenching at the Project site. A site specific SWPPP prepared under the NPDES and use of BMPs during construction, as required by the San Diego Regional Water Quality Control Board, would ensure that construction activities would not violate water quality standards and would mitigate potential impacts associated with erosion or siltation during construction. Upon completion of construction, all temporarily disturbed surfaces would be stabilized and restored to initial condition. Drainage during operations would be the same in pre and post Project conditions. Therefore, impacts related to alteration of the drainage pattern of the area or an increase in runoff that results in erosion, siltation, or flooding on- or offsite, would be less than significant.

d) Less Than Significant. The Project site is not in proximity to any coastline and therefore is not subject to inundation by tsunami, flood or seiche (NV5, 2012b; Appendix D).

e) Less Than Significant. The proposed Project would not conflict with implementation of a water quality control plan or sustainable groundwater management plan. The proposed Project would not result in conditions that would alter or contribute to conflicts with an applicable water quality control plan or sustainable groundwater management plan. No impact would occur.

6.11 LAND USE AND PLANNING

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Physically divide an established community?	☐	☐	☐	☒
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐	☒

Existing Setting

The Project is located north of the City of Vista, within the San Diego County community of Bonsall. The proposed Project alignment is located south of SR-76, west of I-15, north of State SR-78, and east of Vista Way. The proposed alignment travels in generally a north/south direction with east/west extensions at the northern and southern terminuses. The alignment generally travels

along Ormsby Way, Fairview Drive, across Gopher Canyon Road, along Fairview Drive with two new lateral connections from Fairview Drive along Carrio Drive and Via del Cerro.

As shown on **Table 1**, the proposed alignment would traverses land that is designated in the County of San Diego's General Plan Land Use Element, as amended, for Semi-Rural Residential Use (SR-2 and SR-4) (County of San Diego, 2023). Semi-Rural densities range from one dwelling unit per 0.5 acre to one dwelling unit per ten gross acres. Residential development within Semi-Rural areas is not typically served by municipal sewer systems, but is often served by municipal water systems especially where water-intensive crops such as avocado and citrus are common. Additionally, the Zoning Use Regulation along the proposed alignment is "Limited Agriculture (A70)". The Use Regulations are intended to create and preserve areas intended primarily for agricultural crop production permits essential civil use services, which include water distribution lines.

a) No Impact. The replacement pipeline would be installed underground and would not divide an established community. No mitigation would be required.

b) No Impact. Because the Project complies with the General Plan and Bonsall Community Plan it will not conflict with any land use plan, policy or regulation adopted for the purposes of avoiding or mitigating an environmental effect. No mitigation would be required.

Cumulative Impacts

The project conforms with the existing General Plan and zoning designations. The Project would replace existing pipeline. Therefore, the Project's contribution to potential cumulative impacts would not be cumulatively considerable.

6.12 MINERAL RESOURCES

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒

Existing Setting

Pursuant to the California Surface Mining and Reclamation Act (SMARA) of 1975, the California Geological Survey (CGS) classifies land through a mineral inventory process intended to ensure that important mineral deposits are identified and protected for future extraction. The State Geologist classifies mineral areas, Mineral Resource Zones (MRZ) as one of four zones: Mineral Resource Zone 1 (MRZ 1; mineral resources not present); Mineral Resource Zone 2 (MRZ 2; mineral resources present); Mineral Resource Zone 3 (MRZ 3; mineral resources potentially present); and Mineral Resource Zone 4 (MRZ 4; mineral resources inconclusive).

According to the California Department of Conservation and the San Diego County General Plan, the proposed pipeline alignment is located within an MRZ 3 Zone (Department of Conservation, 2015; San Diego County, 2011). Areas with an MRZ 3 Zone indicate the potential presence of Mineral resources.

a and b) No Impact. The proposed alignment would be located on lands that are heavily developed with agricultural and residential uses or are within public rights-of-way where, regardless of the proposed Project, a major mining operation would be unlikely to occur. Therefore, the Project would not result in the loss of availability of any mineral resource. Additionally, the San Diego County General Plan does not identify the Project area as being within a mineral recovery site. For these reasons, implementation of the proposed Project would not result in the loss of availability of a known mineral resource that would be of value to the region or the residents of the state. Similarly, implementation of the proposed Project would not result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan.

Mitigation

No mitigation would be required.

Cumulative Impacts

The proposed Project would not affect mineral resources and, therefore, the project's contribution to cumulative mineral resource impacts would not be considerable.

6.13 NOISE

Would the project result in:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in	☐	☒	☐	☐

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?				
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

Existing Setting

The southern portion of the alignment is surrounded by intensive agricultural uses, field crops and residential uses. As the alignment travels north, surrounding land uses include spaced rural residential, intensive agriculture including orchards, and vacant undeveloped land. The Project alignment is located within the Bonsall Community Planning area. The nearest sensitive receptors are residences located directly along the proposed Project alignment.

The Project is located within San Diego County and would be subject to the County of San Diego Noise Ordinance.

The exterior noise standards limit one-hour dB(A) from 7:00 am to 10:00 pm to 50 dB(A) and from 10:00 pm to 7:00 am to 45 dB(A). The Noise Ordinance states that it shall be unlawful for any person to operate or cause to be operated (1) between the hours of 7:00 p.m. and 7:00 a.m.; (2) on a Sunday or a holiday; or (3) that exceeds an average sound level of 75 decibels for more than eight hours during any 24-hour period, when measured at the boundary line of or on any occupied property.

a) Less Than Significant With Mitigation Incorporated.

Construction

The proposed Project would create noise during Project construction. The construction noise would be short-term and periodic in nature and generated by construction equipment, including trucks, graders, bulldozers, concrete mixers and portable generators. Grading equipment would cause the loudest noise levels. Construction noise levels generated by commonly-used grading equipment (i.e., loaders, graders, and trucks) generate noise levels that are identified in **Table 7**.

TABLE 7: TYPICAL CONSTRUCTION EQUIPMENT NOISE LEVELS

Construction Equipment	Noise Level at 50 Feet (dBA, Lmax)	Noise Level at 100 Feet (dBA, Leq)
Chain Saw	83.7	76.7
Compactor (Ground)	83.2	76.2
Concrete Pump Truck	81.4	74.4
Concrete Saw	89.6	82.6
Dozer	81.7	77.7
Dump Truck	76.5	72.5
Excavator	80.7	76.7
Front End Loader	79.1	75.1
Generator	80.6	77.6
Grader	85.0	81.0
Jackhammer	88.9	81.9
Paver	77.2	74.2
Pneumatic Tools	85.2	82.2
Pumps	80.9	77.9
Scraper	83.6	79.6
Tractor	84.0	80.0

Noise impacts would be significant if they caused a violation of any adopted standards. The majority of Project construction would occur during the daytime hours (7:00 a.m. to 6:00 p.m. Monday through Friday), which is within the allowable County construction hours. The Project would include minimal nighttime construction work at the intersection of Gopher Canyon Road and Fairview Drive. Nighttime construction noise levels would exceed those allowed under the County's Noise Ordinance. The applicant will file an application for a variance from the Noise Ordinance with the noise control officer.

Operations

The Project includes replacing existing waterlines which would be installed underground. Operation of the Project would not substantially differ from existing practices and protocol. The proposed waterlines would not result in an increase in ambient noise levels in the Project area.

Noise generated from construction during daylight hours would not result in a significant impact. However, noise generated from nighttime construction during shutdown periods could be significant. Mitigation measure **MM-NOI- 1** would reduce impacts to a level below significance. Additionally, upon completion of construction, the Project work areas would return to similar conditions prior to construction and the project would not generate noise on a permanent basis. Therefore, impacts during operation would be less than significant.

b) Less Than Significant. Project construction activities may generate temporary groundborne vibration from equipment movement and operation. The Federal Transit Administration (FTA) has developed criteria for human annoyance, and the California Department of Transportation (Caltrans) has developed criteria for potential structural damage to adjacent buildings. To determine vibration impacts for human annoyance and structural damage, these FTA and Caltrans criterial are commonly applied as an industry standard. The FTA recommends 72 velocity decibels (VdB) at residential uses to avoid human annoyance (FTA 2018). Caltrans recommends 0.3-inch-per-second peak particle velocity (PPV) at residential uses, to avoid structural damage to newer buildings (Caltrans 2013).

Based on FTA reference vibration levels, the vibration level associated with the use of a large bulldozer is 0.089 inches per second PPV (87 VdB) at 25 feet. The nearest vibration-sensitive uses to project construction activities are located approximately 82 feet from the proposed alignment. At these distances, the highest vibration levels that would be generated by project construction equipment would attenuate to 0.015 PPV and 72 VdB. The vibration that would be generated by equipment is not anticipated to be excessive. Vibrations will be perceptible to the nearby residences at peak constriction. The construction vibration would be at the FTA threshold of 72 VdB at of human annoyance at the nearest residence. The Project construction vibrations would be below the 0.3 PPV Caltrans threshold for structural damage. The short-term project construction would not result in the exposure of individuals to or the generation of excessive groundborne noise or vibration levels. Therefore, construction-related vibration impacts would be less than significant.

Long-term operational-related activities associated with the proposed Project would not include any major new sources of groundborne noise or vibration.

c) No Impact. The closest airport with an airport land use compatibility plan is Fallbrook Community Airpark, located approximately 9.2 miles northwest of Project site. However, the Project is not located within the compatibility plan. Additionally, there are no public airports located within 2-miles of the Project site. The Project would not expose people residing or working in the area to excessive noise levels. No impact would occur.

Mitigation

MM NOI-1. Obtain Variance from County of San Diego Noise Control Officer for Nighttime Construction.

If nighttime construction is required, the District or their construction contractor shall obtain a variance from the County of San Diego to perform non-emergency work on a public utility authorizing them to temporarily deviate from the requirements of the **NOISE ABATEMENT AND CONTROL Ordinance. The** County noise control officer shall only grant a variance once they have

evaluated the potential noise levels, anticipated duration and determined the impact any noise that does not comply with the limits of this chapter will have on each property likely to be affected by the noise.

If a variance cannot be obtained, nighttime construction shall not be allowed.

Cumulative Impacts

The Project's conformance to the County of San Diego General and County of San Diego Noise Ordinance (Section 36.404, 36.409 and 36.423) ensures the Project will not create cumulatively considerable noise impacts, because the project will not exceed the local noise standards for noise sensitive areas; and the project will not exceed the construction noise limits, derived from State regulation to address human health and quality of life concerns. Therefore, the Project will not contribute to a cumulatively considerable exposure of persons or generation of noise levels in excess of standards established in the local general plan, noise ordinance, and applicable standards of other agencies.

6.14 POPULATION AND HOUSING

Would the project:

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example,	☐	☐	☐	☒
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

Existing Setting

The Project area is currently developed with agricultural and rural residential uses. The Project alignment crosses through residential parcels with existing housing.

a) No Impact. The Project consists of the replacement of existing water pipeline infrastructure. No additional water supply or capacity would result through Project implementation. The Project does not include nor does it encourage the construction of new homes or businesses. Therefore, the Project would not directly or indirectly induce any unplanned population growth and no impacts would not occur.

b) No Impact. Portions of both the existing and proposed Project alignment traverse through residential properties. The Project would relocate the pipeline from the front and back yards of private residences into the public ROW and/or new District easements. The Project would also abandon in-place those pipeline segments currently aligned within the backyards of existing residences and construct a new pipeline within new District easements within the Fairview Drive ROW. The Project would not displace any existing housing units nor require the displacement of any people, necessitating the construction of replacement housing elsewhere. No population or housing impacts would occur.

Mitigation

No mitigation would be required.

Cumulative Impacts

The proposed Project would not displace any existing housing, nor would it develop new housing or result in an increased demand for existing housing. Therefore, the Project's contribution to cumulative impacts on population and housing would not be considerable.

6.15 PUBLIC SERVICES

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any public services:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Fire protection?	☐	☐	☐	☒
b) Police protection?	☐	☐	☐	☒
c) Schools?	☐	☐	☐	☒
d) Parks?	☐	☐	☐	☒
e) Other public facilities?	☐	☐	☐	☒

Existing Setting

Fire Protection

Fire protection services for the Project site is provided by the Vista Fire Protection District. The Vista Fire Protection District provides fire suppression and prevention, rescue, emergency medical

services, hazardous materials response services, administrative services, and disaster preparedness services. The station nearest to the Project Site is Vista Fire Protection District Vista Fire Station 3, located at 1070 Old Taylor Street, approximately 1.02 miles south.

Police Protection

Police services for the Project site are provided by the San Diego County Sheriff's Department. The site would be served by the San Diego County Sheriff's Vista Station, located at 325 South Melrose Drive, approximately 4.70 miles southwest of the Project site.

Public Schools

The northern segment of the Project alignment, north of the Gopher Canyon Road and Fairview Drive intersection, is located within the Bonsall Unified School District boundary. The southern segment of the Project alignment, south of the Gopher Canyon Road and Fairview Drive intersection, is located within the Vista Unified School District. The school nearest to the Project site is Palomar High School, located approximately 1.52 miles south.

Public Parks

A variety of public parks are located within the vicinity of the Project site including Rancho Guajome Adobe Park, Brengle Terrace City Park, and Bonsall Community Park.

Other Facilities (Library Service)

The San Diego County Library system serves over one million residents in the County's unincorporated communities as well as unincorporated cities. The nearest library to the Project site is the Vista Branch Library, located at 700 Eucalyptus Avenue, approximately 3.33 miles south of the Project site.

a, b, c, d and e) Fire Protection, Police Services, Schools, Public Parks and Libraries - No Impact - The Project would replace an existing waterline, which would not result in a temporary or increase in demand on fire protection services, as the Project would not induce population growth nor result in the addition of structures that might require fire protection. The construction and operation of the Project would not have an effect upon or result in a need for new or altered police protection services. The Project would not induce population growth nor result in the addition of housing, schools, or other community facilities that might require police protection. The Project would not introduce a new source of population requiring enhancements to public services such as schools, parks, and libraries. Based on these factors, the proposed Project would not result in the need for new or physically altered governmental facilities and no substantial adverse physical impacts associated with such governmental facilities would result. Therefore, no impacts would occur.

Cumulative Impacts

The Project would not induce substantial population growth that could generate increased demand for public services. The proposed Project would not require the construction of new or physically altered governmental facilities and no substantial adverse physical impacts would occur. Therefore, the Project's contribution to cumulative impacts related to public services would not be considerable.

6.16. RECREATION

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVI. RECREATION.				
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒
b) Include recreational facilities or require the construction or expansion of recreational facilities, which have an adverse physical effect on the environment?	☐	☐	☐	☒

Existing Setting

The Project is within the San Diego County community of Bonsall. The Project would be located within existing District easements or within new District easements. There are no community parks in the Bonsal Community Planning Area. The nearest regional park, Guajome Regional Park is located adjacent to the CPA in the cities of Vista and Oceanside, but serves only some of the needs of the Bonsall community.

On January 12, 2005, the San Diego County Board of Supervisors adopted the County Trails Program and the Community Trails Master Plan, which was updated in June 2009. The Community Trails Master Plan for the Bonsall Community identifies a public trail (what type and what facilities) (Trail No. 15), is proposed along Gopher Canyon Road.

Nearby recreational resources include Rancho Guajome Adobe Park (City of Vista), located southwest of the proposed alignment, Brengle Terrace City Park (City of Vista), located 2.56 miles south of the proposed alignment, and Bonsall Community Park (Bonsall) located 2.66 miles north of the proposed alignment. Other recreational resources within the Community include equestrian trails.

a and b) No Impact. Impacts to recreation facilities and public parks are generated by project-related population increases. The proposed Project is a replacement of existing waterline and does not include housing that could result in increased demand for park and recreational facilities. No recreational facilities are included in the Project nor would it require the expansion of existing recreational facilities that could have an adverse impact on the environment. Therefore, no impacts on parks and recreational facilities are anticipated.

Cumulative Impacts

The proposed Project would replace existing waterline, which would not impact existing recreational facilities, add recreational facilities or generate substantial increased demand for park and recreational facilities. Therefore, the Project's contribution to cumulative impacts on park and recreational facilities would not be considerable.

6.17 TRANSPORTATION

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☒	☐
b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☐	☒	☐
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
d) Result in inadequate emergency access?	☐	☐	☒	☐

Existing Setting

The Project alignment travels in generally a north/south direction with east/west extensions at the northern and southern terminuses. The proposed alignment generally travels along Ormsby Way, across Gopher Canyon Road, along Fairview Drive with a small extension onto Carrio Drive. Ormsby Way is a two-lane paved road off Gopher Canyon Road that extends southward through a residential area, terminating at Bonsall Farms. The Project alignment crosses Gopher Canyon Road at its intersection with Fairview Drive. This intersection is an unsignalized intersection. Both Gopher Canyon Road and Fairview Drive are two-lane paved roads at the intersection. The

alignment continues north along Fairview Drive with a small extension onto Carrio Drive, a two-lane paved road, before continuing north along Fairview Drive, a two-lane paved road.

No sidewalks are provided on Ormsby Way, Gopher Canyon Road, Fairview Drive and Carrio Drive. The nearest North County Transit District (NCTD) bus stop is located at East Vista Way & Strawberry Hill Lane 0.16 miles east of the southern portion of the alignment.

Analysis

Pursuant to Senate Bill (SB) 743, the CEQA guidelines have been updated and the focus of transportation analysis changed from level of service (LOS) or vehicle delay to vehicle miles traveled (VMT). The Governor's Office of Planning and Research (OPR) approved the addition of new Section 15064.3, "Determining the Significance of Transportation Impacts" to the State's CEQA Guidelines, compliance with which is required beginning July 1, 2020. To aid in this transition, OPR released a Technical Advisory on Evaluating Transportation Impacts in CEQA (OPR 2018b) (Technical Advisory). The Updated CEQA Guidelines state that "generally, vehicle miles traveled (VMT) is the most appropriate measure of transportation impacts" and define VMT as "the amount and distance of automobile travel attributable to a project." It should be noted that "automobile" refers to on-road passenger vehicles, specifically cars and light trucks. OPR has clarified in the Technical Advisory and in informational presentations that heavy-duty truck VMT is not required to be included in the estimation of a project's VMT. Other relevant considerations may include the effects of the project on transit and non-motorized traveled.

Based on OPR's Technical Advisory, County of San Diego adopted region-specific transportation criteria and thresholds for the unincorporated areas, as part of its Transportation Study Guidelines, adopted September 2022. Because the Project is located in the unincorporated San Diego County area, the VMT analysis requirements per CEQA Guidelines Section 15064.3(b) for the Project were conducted based on guidance provided in OPR's Technical Advisory and supplemented with the San Diego Transportation Study Guidelines.

Trip generation from construction of the Project has been estimated for analysis purposes. The Institute of Transportation Engineers' (ITE) Trip Generation Manual does not contain trip rates for construction- related activities associated with the Project, therefore, it is primarily based on the number of construction employees or workers as well as the quantity of vendor and haul-related truck estimates used in the proposed project's air quality analysis. Each worker and truck are assumed to generate two daily trips, one inbound and one outbound. The construction work shift would occur between 7:00 a.m. and 7:00 p.m. The majority of the workers would arrive and depart outside of the AM peak hour (generally occurs between 7:00 a.m. – 9:00 a.m.) and PM peak hour (generally occurs between 4:00 p.m. – 6:00 p.m.) of the adjacent street network. Vendor truck traffic and haul trips are anticipated to be evenly distributed through the 12-hour workday.

As shown in **Table Traffic 8**, the Project would generate 26 total daily trips, 3 AM peak hour trips and 3 PM peak hour trips during construction.

TABLE 8. CONSTRUCTION TRIP GENERATION

Vehicle Type	Daily Quantity	Daily Trips	AM Peak Hour			PM Peak Hour		
			In	Out	Total	In	Out	Total
Workers	9 Workers	18	2	0	2	0	2	2
Vendors	4 Trucks	8	1	0	1	0	1	1
TOTAL		**26**	**3**	**0**	**3**	**0**	**3**	**3**

a and b) Less Than Significant. The Project would not increase traffic capacity or otherwise cause a substantial permanent increase in traffic relative to existing conditions, would not exceed individually or cumulatively a level of service standard, or conflict with a congestion management plan or other applicable plans, policies or ordinances established for the performance of the circulation system.

The Project would generate temporary construction traffic and temporary traffic impacts at the intersection of Gopher Canyon Road and Fairview Drive. An existing 6-inch AC pipeline branches from the Tres Amigos pipeline within the intersection of Gopher Canyon Road and Fairview Drive which would be shut down in order to connect a new 8-inch ductile iron tee with an 8-inch x 6-inch reducer and 6-inch gate valve to the new alignment. Construction would be scheduled during off-peak usage time to reduce potential traffic impacts. Traffic control requirements would be coordinated with the San Diego County Department of Public Works and included in the Project specifications. The selected Construction Contractor will be responsible for preparing traffic control plans for construction and obtaining required permits from the County of San Diego.

Worker trips would generate VMT, but once construction is completed, the construction-related traffic would cease and would return to preconstruction conditions. The increase in VMT associated with Project construction is expected to be temporary and short term and would therefore not cause a significant impact.

The proposed new waterlines would be constructed in existing District easements along roadways and in new easements within Bonsall Farms and residential properties and would not interfere with the surrounding circulation system. The Project area is in a rural residential area that does not feature bicycle and pedestrian facilities. As such, the Project would not impede access, plans, programs, or policies related to the facilities. The proposed Project would not conflict with adopted policies, plans, or programs regarding public transit, bicycle or pedestrian facilities or otherwise decrease the performance or safety of such facilities. Access to and from the Project area would remain the same. No changes to existing bike lanes or sidewalks are proposed. Impacts would be less than significant.

The Project would replace existing waterlines and that would not generate frequent daily vehicle trips as part of long-term operations. Operation of the Project would not require additional permanent employees; thus, the Project would not result in an increase in permanent traffic.

Construction trips would occur for a short period of time for the Project. Impacts would be less than significant.

c and d) Less Than Significant. The proposed Project would not substantially increase driving hazards due to a design feature or incompatible uses. Access routes to and from the Project site would not be changed and no changes to the existing circulation network are proposed. Therefore, Project impact would be less than significant.

The Project includes construction work within the Gopher Canyon Road and Fairview Drive intersection, which would result in temporary traffic impacts. The construction would be scheduled during off-peak usage time to reduce potential traffic impacts. Wherever feasible and consistent with public and worker safety, at least one traffic lane will be maintained in operation during construction. All routes would also remain fully accessible for emergency vehicles and would not interfere with emergency response or evacuation plans. Upon completion of construction, the Project work areas would return to similar pre-construction conditions. Therefore, implementation of the Project would not impair an adopted emergency response plan or emergency evacuation plan. Impacts would be less than significant.

Mitigation Measures

No mitigation would be required.

Cumulative Impacts

The proposed Project would require short-term construction-related traffic and a de minimis volume of truck trips for routine inspections and maintenance. For these reasons, the Project's contribution to potential cumulative transportation impacts would not be considerable.

6.18 TRIBAL CULTURAL RESOURCES

Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☐	☒	☐	☐
b) A resource determined by the lead agency, in its discretion and supported by	☐	☒	☐	☐

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.				

Native American Consultation

On April 28, 2022, a sacred lands search was requested from the Native American Heritage Commission (NAHC) to request a search of their Sacred Lands File (SLF) and a list of Native American contacts who may know areas of cultural concern, such as traditional cultural places, sacred sites, archaeological sites, or cultural landscapes that may exist within one mile of the proposed pipeline alignment. The NAHC responded on June 9, 2022, stating that a review of the sacred land files was negative for specific site information within the 1-mi. search radius.

Based on the NAHC's Native American Contact List, on October 3, 2023, the District sent letters to 29 California Native American Tribes or Tribal Representatives with historical and traditional ties to the project area. The letters provided a brief description of the Project, its location, and lead agency contact information. The letters also requested a written response from the Tribe or Representee noting their desire to consult on the Project. Copies of the letters are provided in Appendix C-2 of this Initial Study. The Pechanga Band of Indians, the Rincon Band of Luiseño Indians, and the San Luis Rey Band of Mission Indians have requested "formal consultation" under Assembly Bill 52 (AB 52). Copies of their responses are included in Appendix C-3 of this Initial Study. Consultation is on-going and the District has provided the additional information requested. None of the tribes have identified specific resources known to occur within the areas that would be disturbed by Project construction. However, Mitigation Measures MM CUL-4 (Disposition of Tribal Cultural Resources) and MM CUL-5 (Prepare Final Monitoring Report and/or Evaluation Report) have been incorporated into the Project at the request of the Rincon Band of Luiseño Indians.

a. and b) Less Than Significant with Mitigation Incorporated. Tribal cultural resources are defined in Public Resources Code Section 21074 as sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either of the following:

- Included or determined to be eligible for inclusion in the California Register of Historical Resources; or
- Included in a local register of historical resources as defined in subdivision (k) of Public Resources Code Section 5020.1.

AB 52 consultation letters were sent out to 29 California Native American Tribes or their representatives based on a list provided by the Native American Heritage Commission. Copies of the letters have been included as Appendix C-2 to this Initial Study.

The Project involves limited ground disturbing activity within existing developed/disturbed areas and no archeological resources were found during the on-site survey. There are no known archaeological resources recoded within one-mile of the on the site and no archaeological resources were identified during the pedestrian survey of the APE.

Although the likelihood of encountering isolated archaeological resources along the proposed alignment is very low, due to previous grading and construction-related ground disturbance, mitigation measures MM CUL-1, MM CUL-2 and MM CUL-3 shall be implemented to ensure that unanticipated buried cultural material is adequately recorded and evaluated should it be encountered during the installation of the pipeline.

Cumulative Impacts

The proposed Project would not contribute to any cumulative permanent adverse impacts on tribal cultural resources.

6.19 UTILITIES AND SERVICE SYSTEMS

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
c) Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has	☐	☐	☒	☐

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?				
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☐	☒

a) Less Than Significant. The Project consists of replacement of existing water infrastructure. The Project would not result in a development that would substantially increase the demand for water or wastewater services such as new commercial or residential land uses. During construction, water usage would be temporary and minimal. During operation, the Project would not employ additional personnel other than the existing maintenance personnel serving the site. Operation of the Project would be similar to existing operation and maintenance of the water pipeline. No new or altered wastewater treatment, electric power, natural gas, or telecommunication facilities would be required. Therefore, impacts associated with the relocation or construction of new water, wastewater treatment, electric power, natural gas, or telecommunication facilities would be less than significant.

b) Less Than Significant. During construction, water usage would be temporary and minimal for watering disturbed area's needs. Therefore, impacts would be less than significant.

c) Less Than Significant. No employees would be permanently stationed at the site, and the Project does not include restrooms. The Project would not require or result in the construction of new wastewater treatment facilities or expansion of existing facilities. The Project would require minimal water use during construction. Because the site would not contain a permanent workforce, no toilet facilities would be required and there would be no demand for wastewater service. The Project would not result in an increased demand on wastewater services. Therefore, a less than significant would occur.

d) Less Than Significant. Solid waste disposal in the Bonsall is provided by a private franchise hauler, EDCO Waste and Recycling (EDCO). Waste collected by EDCO is hauled to the Escondido Resource Recovery Transfer Station where it is then transported to the Sycamore Sanitary Landfill in Santee. The Escondido Transfer Station has a daily capacity of 2,500 tons and the Sycamore Sanitary Landfill has a daily permitted capacity of 3,965 tons/day of solid waste with an anticipated closure date of 2031.

The proposed Project consists of short-term waste generation limited to minor quantities of construction debris, most of which would be recyclable. The majority of the existing pipeline would be abandoned in place. Abandoned pipelines would be cut and plugged with low strength concrete slurry. In locations where the existing pipeline could impact future District activities or interferes with the Project alignment the pipeline would be removed and disposed of by the Project contractor. The Sycamore Landfill has the capacity to accommodate the limited solid waste during construction process.

Implementation of the Project would generate solid waste in the form of construction and demolition debris that will need to be hauled off site and recycled or disposed of in a landfill. Diversion of construction and demolition debris via recycling at a local recycling facility would reduce the amount of waste sent to a landfill. Additionally, waste generated from construction would be temporary and would be nominal compared to the daily capacity accepted at Sycamore Landfill. Address recycling requirements new Assembly bill

e) No Impact. The Project would comply with all federal, state, and local statutes and regulation related to solid waste. The Project would consist of short-term construction activities (with short-term waste generation limited to minor quantities of construction debris) and thus would not result in long- term solid waste generation. Solid wastes produced during the construction phase of this Project would be disposed of in accordance with all applicable statutes and regulations. Accordingly, anticipated impacts from the proposed Project related to landfill capacity and compliance with applicable regulations would be less than significant.

Mitigation

No mitigation would be required.

Cumulative Impacts

The proposed Project would not contribute to any cumulative permanent adverse impacts on utilities.

6.20 WILDFIRE

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☒	☐
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☒	☐

a) Less Than Significant. The Project includes construction work within the Gopher Canyon Road and Fairview Drive intersection, which would result in temporary traffic impacts. The construction would be scheduled during off-peak usage time to reduce potential traffic impacts. Traffic control requirements would be coordinated with the San Diego County Department of Public Works and included in the Project specifications. The selected Project contractor will be responsible for preparing traffic control plans for construction and obtaining required permits from the County of San Diego. Wherever feasible and consistent with public and worker safety, at least one traffic lane will be maintained in operation during construction. All routes would also remain fully accessible for emergency vehicles and would not interfere with emergency response or evacuation plans. Upon completion of construction, the Project work areas would return to similar pre-construction conditions. Therefore, implementation of the Project would not impair an adopted emergency response plan or emergency evacuation plan. Impacts would be less than significant.

b) No Impact. Construction of the Project would not alter on-site slopes or influence prevailing winds or other factors that could exacerbate wildfire risk. The Project would replace underground waterlines within existing and new District easements. Upon completion of construction, the Project would return to similar pre-construction conditions, with the addition of new underground pipeline alignment. Operation and maintenance of the Project would not substantially differ from

existing practices and protocol. Therefore, the proposed Project would not expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. No impacts would occur.

c) Less Than Significant. The Project would construct new permanent waterlines in order to replace existing infrastructure. As discussed in Section 6.19, Utilities and Service Systems, no new service utilities would be required for the Project. Given that the activities involved with installation or maintenance of associated infrastructure would require ground disturbance and the use of heavy machinery associated construction and maintenance activities, this would result in temporary or ongoing impacts to the environment. However, the installation and maintenance of associated infrastructure have been analyzed herein. As such, any potential temporary or ongoing environmental impacts related to these components of the Project have been accounted for and analyzed as part of the impact assessment conducted for the entirety of the Project. Additionally, the Project would be required to comply with all regulatory requirements and mitigation measures outlined within this IS/MND for the purposes of mitigating impacts associated Project. No adverse physical effects beyond those already disclosed and mitigated would occur as a result of implementation of the Project's associated infrastructure. Therefore, with implementation standard measures to reduce fire risk and compliance with regulatory requirements, the installation and maintenance of associated infrastructure would not exacerbate wildfire risk or result in impacts to the environment beyond those already disclosed throughout this document, and impacts would be less than significant.

d) Less Than Significant. The proposed Project would not include any habitable structures and would change the slope of the Project site. Additionally, the Project would development and implementation a SWPPP and associated BMPs related to erosion and sediment control. Project implementation would not expose people or structures to significant risks because of runoff, post-fire slope instability, or drainage changes. The impact would be less than significant.

Mitigation

No mitigation would be required.

Cumulative Impacts

The proposed Project would not contribute to any cumulative permanent adverse impacts on utilities.

6.21 MANDATORY FINDINGS OF SIGNIFICANCE

Would the project:

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current project, and the effects of probable future projects.)	☐	☒	☐	☐
c) Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☐	☐

a) Less-than-Significant Impact with Mitigation Incorporated.

Biological Resources

Potential impacts related to sensitive and special-status habitat, wildlife species, and plant species are discussed in Section 6.4, Biological Resources. As discussed in **Section 6.4, Biological Resources,** all potentially significant impacts to biological resources would be reduced to a level below significance with incorporation of mitigation measures MM BIO-1, MM BIO-2 and MM BIO-3. With these measures, the Project would not substantially degrade the quality of the environment, impact fish or wildlife species, or plant communities.

California History/Pre-History

As discussed in Section 6.5, Cultural Resources, and Section 6.18, Tribal Cultural Resources, potential impacts to cultural resources and tribal cultural resources would be reduced to a level below significance with incorporation of mitigation measures MM CUL-1 through MM CUL-5. The proposed Project would not eliminate important examples of the major periods of California history or prehistory. Overall, Impacts would be less than significant with incorporation of

mitigation measures. The potential of the Project to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory were considered in the Biological and Cultural Resource Sections of this Initial Study. In addition to Project specific impacts, these evaluations considered the Project's potential for significant cumulative effects. Resources that have been evaluated as significant could be potentially impacted by the Project. However, mitigation has been included that clearly reduces these effects to a level below significance.

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

b) Less-than-Significant Impact with Mitigation Incorporated. Given the nature of the project, potential cumulative impacts could occur during the temporary construction work if other cumulative projects occur in the same timeframe. The project is located in a rural area with sparse residential uses and active agriculture. Due to the project's location, the potential for construction to overlap with construction of other projects would be reduced. Additionally, the proposed Project, as with potential cumulative projects, would incorporate mitigation measures MM NOI-1 to reduce construction related impacts, impacts, including those from construction noise. The proposed Project and potential cumulative projects would each comply with applicable traffic regulations, and cumulative projects would implement traffic control plans, as necessary, for construction trips such that circulation and access are not significantly impacted. Upon completion of construction, the proposed Project would have no potential to contribute to a cumulative impact. Impacts would be less than significant with incorporation of mitigation measures.

c) **Less-than-Significant Impact with Mitigation Incorporated.** The potential for adverse direct or indirect impacts to human beings was considered throughout Chapter 3 of this IS/MND which would result in less than significant impact with and without mitigation measures, including air quality (**Section 6.3**), hazards and hazardous materials (**Section 6.9**), and noise (Section 6.13). Based on this evaluation, there is no substantial evidence that construction of the replacement pipeline, with the proposed mitigation measures incorporated, would result in a substantial adverse effect on human beings. Impacts would be less than significant with incorporation of mitigation measures.

7.0 REFERENCES

Birdseye Consulting Group, 2023. Air Quality and Greenhouse Gas Analysis. (Appendix A).

CAL FIRE, 2007 (November). CAL FIRE Fire Hazard Severity Zones In SRA. Available: https://osfm.fire.ca.gov/media/6789/fhszs_map37.pdf. Accessed December 1, 2021.

California Department of Conservation, 2015. CGS Information Warehouse: Mineral Land Classification. Available: https://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=mlc. Accessed December 1, 2021.

Caltrans, 2021. California State Scenic Highway System Map. Available: https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa. Accessed December 1, 2021.

Caltrans, 2013. California Department of Transportation (Caltrans) Transportation and Construction Vibration Guidance Manual. Available: https://www.contracosta.ca.gov/DocumentCenter/View/34120/Caltrans-2013-construction-vibration-PDF. Accessed December 1, 2021.

County of San Diego, 2023. County of San Diego General Plan Land Use Element, as amended, February 10, 2023 – GPA 21-006).

County of San Diego, 2021. County of San Diego General Plan Land Use Element, as amended July 14, 2021. Available at: https://www.sandiegocounty.gov/content/dam/sdc/pds/gpupdate/docs/GP/LandUseElement.pdf. Accessed February 20, 2023.

County of San Diego, 2011 (August). County of San Diego General Plan. Available: https://www.sandiegocounty.gov/pds/generalplan.html. Accessed December 1, 2021.

County of San Diego, 2009 (January). County Code of Regulatory Ordinances, Title 3, Division 6, Chapter 4; effective January 2009. Available at: https://codelibrary.amlegal.com/codes/san_diego/latest/sandiego_regs/0-0-0-76033#JD_36.401. Accessed December 1, 2021.

ASM Affiliates, 2022. Cultural Resources Report ASM 2021. (Appendix C).

DTSC, 2021. California Department of Toxic Substances Control (DTSC) EnviroStor. Available: https://www.envirostor.dtsc.ca.gov/public/. Accessed December 1, 2021.

EPA, 2021. United States Environmental Protection Agency (EPA) Envirofacts. Available: https://enviro.epa.gov/facts/multisystem.html. Accessed December 1, 2021.

FHWA, 2006 (August). Federal Highway Administration (FHWA) Roadway Construction Noise Handbook. Available: https://www.fhwa.dot.gov/environment/noise/construction_noise/handbook/. Accessed December 1, 2021.

FTA, 2018 (September). Federal Transit Administration (FTA) Transit Noise and Vibration Impact Assessment Manual. Available: https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf. Accessed December 1, 2021.

Merkel & Associates, 2023. Biological Impact Analysis Letter Report for the Vallecitos Water District, Tres Amigos Waterline Replacement Project. Prepared by Merkel & Associates, March, 2023 (Appendix B).

NV5, 2021a. Preliminary Design Report for the Tres Amigos Waterline Project. Prepared by NV5 for the Vallecitos Water District, September 2021.

NV5, 2021b. Tres Amigos Waterline Replacement Project Geotechnical Investigation Report. Prepared by NV5, November 2021.

NV5, 2021b. Tres Amigos Waterline Replacement Project Geotechnical Investigation Report. Prepared by NV5, November 2021.

San Diego County, 1978. San Diego County Zoning Ordinance. 1978, as amended.

SWRCB, 2021. State Water Resources Control Board (SWRCB) GeoTracker. Available: https://geotracker.waterboards.ca.gov/. Accessed December 1, 2021.

Vallecitos Water District, 2019. Final Program Environmental Impact Report for the 2018 Water, Wastewater, and Recycled Water Master Plan (SCH 2017111082). Prepared for the Vallecitos Water District. Prepared by RECON Environmental, Inc. 2019.

Vallecitos Water District, 2023. Vallecitos Water District website. Available at: https://www.vwd.org/about-us. Accessed February 17, 2023.

8.0 PREPARERS

The following professional staff participated in the preparation of this IS/MND.

Vallecitos Water District CIP Engineering

Ryan Morgan, Capital Facilities Senior Engineer

Willis Environmental Planning

Christina J. Willis, Project Manager and Principal Investigator
Rachel Rowe, Environmental Planner and GIS Analyst

Willis Environmental Planning was assisted by the following consultants:

AMS Affiliates (Cultural Resources)

James T. Daniels, Jr, Senior Archaeologist
Holly Drake, Associate Archaeologist
Mario Herrera, Native American Monitor (Saving Sacred Sites)

Birdseye Consulting Group (Air Quality/GHG)

Ryan Birdseye, Principal

Merkel & Associates (Biological Resources)

Amanda Gonzales, Biologist

10.0 MITIGATION MONITORING AND REPORTING PROGRAM

Vallecitos Water District
Tres Amigos Waterline Replacement Project

The Vallecitos Water District will adopt this Mitigation Monitoring and Reporting Program (MMRP) in accordance with Public Resources Code (PRC) Section 21081.6 and Section 15097 of the California Environmental Quality Act (CEQA) Guidelines. The purpose of the MMRP is to ensure that the Tres Amigos Waterline Replacement Project, which is the subject of the Mitigated Negative Declaration (MND), complies with all applicable environmental mitigation requirements. The mitigation measures for the project will be adopted by the Vallecitos Water District, in conjunction with the adoption of the MND. The mitigation measures have been integrated into this MMRP. Within this document, the approved mitigation measures are organized and referenced by subject as presented on **Table 9**. The specific mitigation measures are identified, as well as the method and timing of verification and the responsible party that will ensure that each action is implemented.

Public Resources Code Section 21081.6 requires the Lead Agency, for each project that is subject to CEQA, to monitor performance of the mitigation measures included in any environmental document to ensure that implementation does, in fact, take place. The Vallecitos Water District is the designated lead agency for the MMRP. The Vallecitos Water District is responsible for review of all monitoring reports, enforcement actions, and document disposition. The Vallecitos Water District will rely on information provided by the monitor as accurate and up to date and will field check mitigation measure status as required.

A record of the MMRP will be available at Vallecitos Water District, 201 Vallecitos De Oro, San Marcos, CA 92069. All mitigation measures contained in the MND shall be made conditions of the Project as further described below:

TABLE 9. MITIGATION MONITORING AND REPORTING PROGRAM – TRES AMIGOS WATERLINE REPLACEMENT PROJECT

Mitigation Measure	Method of Verification	Timing of Verification				Responsible Party	Completed	
		Design	*Pre Const.*	*During Const.*	*Post Const.*		*Initials*	*Date*
Biological Resources								
MM BIO-1: Southern Mixed Chaparral and Non-Native Grassland Mitigation Temporary impacts to 0.06 acre of southern mixed chaparral and 0.04 acre of non-native grassland shall be mitigated at a ratio of 1:1. Impacts to disturbed habitat would either be mitigated via onsite restoration (details provided in a restoration construction sheet) or via acquisition of offsite habitat credits from a resource-agency approved mitigation bank at a 0.5:1 ratio, with the bank preferably within the same watershed as the Project (e.g., North County Habitat Bank). • If onsite restoration is selected, revegetation shall occur via planting and hydroseed application throughout the disturbed areas and a 36-month monitoring period or until the success criteria are achieved. The details of the revegetation should be presented within a revegetation construction sheet(s). Two plant palettes shall be required, one for revegetation of impacted areas of southern mixed chaparral and one for impacted areas of non-native grassland. • A native erosion control seed mix (e.g., S&S Seeds Basic Native Erosion Control Mix) may be used to restore areas of non-native grassland. All native seed/plants should be from seed and propagules collected within the local San Diego region, as close to the site as possible. • Maintenance and monitoring shall be implemented by a qualified Restoration Contractor with oversight by a Restoration Specialist and should occur as needed until the success criteria are achieved. • Success criteria should include at minimum, the following: coverage by native species is consistent with coverage in	Monitoring and Report Preparation			X	X	Vallecitos Water District		

TABLE 9. MITIGATION MONITORING AND REPORTING PROGRAM – TRES AMIGOS WATERLINE REPLACEMENT PROJECT

Mitigation Measure	Method of Verification	Timing of Verification				Responsible Party	Completed	
		Design	*Pre Const.*	*During Const.*	*Post Const.*		*Initials*	*Date*
the adjacent, non-impacted habitat and invasive plant species7 should be absent from the revegetation area. • Following achievement of the success criteria, a memo documenting the status of the revegetation area should be prepared and submitted by the Restoration Specialist to the District. • The revegetation sheet should include the following: 1) purpose and location of the revegetation areas, 2) success criteria and remedial measures, 3) schedule for maintenance, monitoring, and reporting, 4) planting palette, 5) site preparation, 6) installation procedures, 7) supplemental irrigation if determined necessary, and 8) maintenance requirements. • The Revegetation Contractor should have the minimum qualifications: 1) three years of local, verifiable experience in maintenance and monitoring involving resources similar to those onsite; 2) ability to carry out maintenance and monitoring as required; and 3) applicable licenses to implement maintenance.								
MM BIO-2: Indirect Impact Mitigation During construction, impacts to regionally sensitive habitats adjacent to the project limit of work may occur if not effectively controlled through project design and construction monitoring and management actions. To mitigate impacts to adjacent habitats, the following impact control measures are recommended: Temporary perimeter fencing should be installed when adjacent to sensitive resources consisting of the southern mixed chaparral, non-native grassland, and potential jurisdictional resources. A biologist, approved by the District should oversee installation of the temporary fencing.	Monitoring and Report Preparation			X	X	Vallecitos Water District		

7 Invasive plant species include any species identified as having a High inventory rating by California Invasive Plant Council (Cal-IPC) and any nuisance plant causing potential detriment to native flora and/or fauna as determined by the Restoration Specialist.

TABLE 9. MITIGATION MONITORING AND REPORTING PROGRAM – TRES AMIGOS WATERLINE REPLACEMENT PROJECT

Mitigation Measure	Method of Verification	Timing of Verification				Responsible Party	Completed	
		Design	*Pre Const.*	*During Const.*	*Post Const.*		*Initials*	*Date*
The biologist should also conduct the following: provide environmental training to the construction crew to notify them of the sensitive resources in the area; be onsite during the initial clearing of habitat and excavation work when adjacent to the sensitive resource areas; conduct weekly inspections during excavation work to ensure general biological compliance; and prepare a post-construction memo for the District, documenting compliance with the biological conditions imposed on the project. The biologist should have the authority to halt construction activities, if needed and should report any violation to the District within 48 hours of detection. Construction techniques and BMPs should be developed for the project to prevent encroachment into potential jurisdictional resources and to prevent erosion and/or export of sediment from the site during storm events. BMPs proposed for the project should not include any species listed by the California Invasive Plant Council (Cal-IPC) in the California Invasive Plant Inventory. Temporary lighting during night-time construction, if needed, shall be downcast/fully shielded and directed away from adjacent habitat.								
MM BIO-3: Conduct Pre-Construction Surveys for Coastal California Gnatcatchers, Raptors and Migratory Birds. Construction shall be timed to avoid the breeding season for coastal California gnatcatcher (March 1 to August 15) and other avian species protected by the MBTA and CFGC (February 15 to August 31). If construction activities are to take place during the combined bird breeding season (i.e., February 15 through August 31 for most bird species and January 1 through August 31 for raptors), the following measures shall be implemented as follows:	Monitoring and Report Preparation			X	X	Vallecitos Water District		

TABLE 9. MITIGATION MONITORING AND REPORTING PROGRAM – TRES AMIGOS WATERLINE REPLACEMENT PROJECT

Mitigation Measure	Method of Verification	Timing of Verification				Responsible Party	Completed	
		Design	*Pre Const.*	*During Const.*	*Post Const.*		*Initials*	*Date*
Pre-construction surveys shall be conducted for coastal California gnatcatcher by a qualified biologist with experience performing protocol surveys for the species. A total of two survey visits should be performed, including one within seven days of the start of construction. If no gnatcatchers are detected within 300 feet of the project impact areas, no additional measures will be needed for this species. If coastal California gnatcatchers are detected, no construction may occur within 300 feet of occupied habitat until the end of the breeding season. A pre-construction clearance survey within the impact area shall be conducted for other avian species protected by the MBTA and CFGC Sections 3503 and 3503.5. This could be conducted concurrently with the pre-construction survey in MM-BIO-3(a) or separately. If no nesting birds are detected in the impact area, no additional measures would be required. If nesting birds are detected within the impact area, a construction avoidance buffer would be required around the nest to ensure no construction activities may occur within the buffer until the end of the breeding season or after the nest is no longer active. The radius of the avoidance buffer would be determined based on the species and location of the nest. If nests of any species are detected during the pre-construction surveys described in Recommendation 3(b), a biological monitor shall be retained to monitor construction when activities would occur adjacent to the avoidance buffer. The biological monitor shall make periodic (i.e., weekly) site visits to inspect the nest and determine whether it is active. Note that active coastal California gnatcatcher nests may only be inspected by a biologist with a coastal California gnatcatcher nest monitoring permit from USFWS.								

TABLE 9. MITIGATION MONITORING AND REPORTING PROGRAM – TRES AMIGOS WATERLINE REPLACEMENT PROJECT

Mitigation Measure	Method of Verification	Timing of Verification				Responsible Party	Completed	
		Design	*Pre Const.*	*During Const.*	*Post Const.*		*Initials*	*Date*
Cultural Resources								
MM CUL-1: Construction Monitoring for Unanticipated Discoveries. The project's grading and construction plans and specifications shall state that full-time monitoring by a qualified archaeologist shall be conducted during the initial grubbing and ground disturbance for the Project. The project archaeologist, in coordination with the District, may re-evaluate the necessity for monitoring after the initial five feet of excavations have been completed. In the event that archaeological resources are inadvertently discovered during ground-disturbing activities, work must be halted within 50 feet of the find until it can be evaluated by a qualified archaeologist. Construction activities could continue in other areas. If the discovery proves to be significant, additional work, such as data recovery excavation or fossil recovery, may be warranted and would be discussed in consultation with the appropriate regulatory agency(ies). Native American tribes shall be given the opportunity to provide one or more certified cultural monitors for the Project during all excavation or earth-moving within the Project site in Holocene-aged deposits. The Construction Contractor shall give the tribe's Historic Preservation Officer (THPO) or other designated representative two weeks' notice and shall provide a copy of such notice to the District.	Monitoring and Report Preparation			X		Vallecitos Water District		

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Mitigation Measure	Method of Verification	Timing of Verification				Responsible Party	Completed	
		Design	*Pre Const.*	*During Const.*	*Post Const.*		*Initials*	*Date*
MM CUL-2: Human Remains. Procedures of conduct following the discovery of human remains on non-federal lands have been mandated by California Health and Safety Code §7050.5, California Public Resources Code §5097.98, and California Code of Regulations (CCR) §15064.5(e). Should human remains be encountered, all work in the immediate vicinity of the burial must cease, and any necessary steps to ensure the integrity of the immediate area must be taken. The San Diego County Coroner will be immediately notified. The Coroner must then determine whether the remains are Native American. If the Coroner determines the remains are Native American, the Coroner has 24 hours to notify the NAHC, who will, in turn, notify the person they identify as the most likely descendent (MLD) of any human remains. Further actions will be determined, in part, by the desires of the MLD. The MLD has 48 hours to make recommendations regarding the disposition of the remains following notification from the NAHC of the discovery. If the MLD does not make recommendations within 48 hours, the owner shall, with appropriate dignity, reinter the remains in an area of the property secure from further disturbance. Alternatively, if the owner does not accept the MLD's recommendations, the owner or the descendent may request mediation by the NAHC.	Monitoring and Report Preparation			X		Vallecitos Water District		
MM CUL-3: Avoid Potential Effects on Undiscovered Burials. The District shall implement the following measures to reduce or avoid impacts related to undiscovered burials. In accordance with the California Health and Safety Code, if human remains are uncovered during ground-disturbing activities, all potentially damaging ground-disturbance in the area of the burial and a 100-foot radius shall halt and the San Diego County Coroner shall be notified immediately. The coroner is required to examine all discoveries of human remains within 48 hours of	Monitoring and Report Preparation			X		Vallecitos Water District		

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Mitigation Measure	Method of Verification	Timing of Verification				Responsible Party	Completed	
		Design	*Pre Const.*	*During Const.*	*Post Const.*		*Initials*	*Date*
receiving notice of a discovery on private or state lands (Health and Safety Code Section 7050.5[b]). If the coroner determines that the remains are those of a Native American, then Federal laws governing the disposition of those remain would come into effect. Specifically, the Native American Graves Protection and Repatriation Act (NAGPR). California law also recognizes the need to protect Native American human burials, skeletal remains, and items associated with Native American burials from vandalism and inadvertent destruction. The District shall ensure that the procedures for the treatment of Native American human remains contained in California Health and Safety Code Sections 7050.5 and 7052 and Public Resources Code Section 5097 are followed								
MM CUL-4: Disposition of Tribal Cultural Resources. The landowner shall relinquish ownership of all tribal cultural resources collected during the cultural resource mitigation monitoring conducted during all ground disturbing activities, and from any previous archaeological studies or excavations on the Project site to the TCA tribe for respectful and dignified treatment and disposition, including reburial, in accordance with the Tribe's cultural and spiritual traditions. All cultural materials that are associated with burial and/or funerary goods will be repatriated to the Most Likely Descendant as determined by the Native American Heritage Commission per California Public Resources Code Section 5097.98.	Monitoring and Report Preparation			X		Vallecitos Water District		
MM CUL-5: Prepare Final Monitoring Report and/or Evaluation Report. Prior to the release of the Grading Bond and no later than 90 days after monitoring has been completed, a Monitoring Report and/or Evaluation Report shall be completed. This report shall describe the results, analysis and conclusions of the cultural resource mitigation monitoring efforts (such as, but not limited	Monitoring and Report Preparation			X		Vallecitos Water District		

TABLE 9. MITIGATION MONITORING AND REPORTING PROGRAM – TRES AMIGOS WATERLINE REPLACEMENT PROJECT

Mitigation Measure	Method of Verification	Timing of Verification				Responsible Party	Completed	
		Design	*Pre Const.*	*During Const.*	*Post Const.*		*Initials*	*Date*
to, the Research Design and Data Recovery Program). It will also include a list of project personnel, a catalog of any cultural resources that were identified, any associated DPR 523 Forms and/or confidential maps, details of the location of the final disposition of cultural resources (if any), any issues or problems that occurred during monitoring, and any other pertinent information. The Monitoring Report shall be submitted by the project archaeologist, along with the notes and comments from the TCA Native American Monitor(s), to the Vallecitos Water District for review and approval. Upon approval by the Lead Agency, a complete final report shall be submitted to the appropriate Information Center, the Rincon Band of Luiseño Indians, any relevant curation facility, and the landowner/applicant.								
Geology and Soils (Paleontological Resources)								
MM GEO-1: Obtain Coverage under the General Activities Stormwater Permit/ Prepare and Implement a Stormwater Pollution Prevention Plan. District or its approved construction contractor shall file a Notice of Intent (NOI) with the San Diego Regional Water Quality Control Board, to discharge in compliance with the statewide National Pollutant Discharge Elimination System (NPDES) Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Order 2022-0057-DWQ). A certified Qualified SWPPP Developer (QSD) shall prepare a Storm Water Pollution Prevention Plan (SWPPP) and implement associated Best Management Practices (BMPs) that are specifically designed to reduce construction-related erosion.	Monitoring and Plan Preparation			X	X	Vallecitos Water District/ Construction Contractor		

TABLE 9. MITIGATION MONITORING AND REPORTING PROGRAM – TRES AMIGOS WATERLINE REPLACEMENT PROJECT

Mitigation Measure	Method of Verification	Timing of Verification				Responsible Party	Completed	
		Design	*Pre Const.*	*During Const.*	*Post Const.*		*Initials*	*Date*
Noise								
MM NOI-1: Obtain Variance from County of San Diego Noise Control Officer for Nighttime Construction. If nighttime construction is required, the District or their construction contractor shall obtain a variance from the County of San Diego to perform non-emergency work on a public utility authorizing them to temporarily deviate from the requirements of the Noise Abatement and Control Ordinance. The County noise control officer shall only grant a variance once they have evaluated the potential noise levels, anticipated duration and determined the impact any noise that does not comply with the limits of this chapter will have on each property likely to be affected by the noise. If a variance cannot be obtained, nighttime construction shall not be allowed.	Monitoring and Plan Preparation			X	X	Vallecitos Water District/ Construction Contractor		

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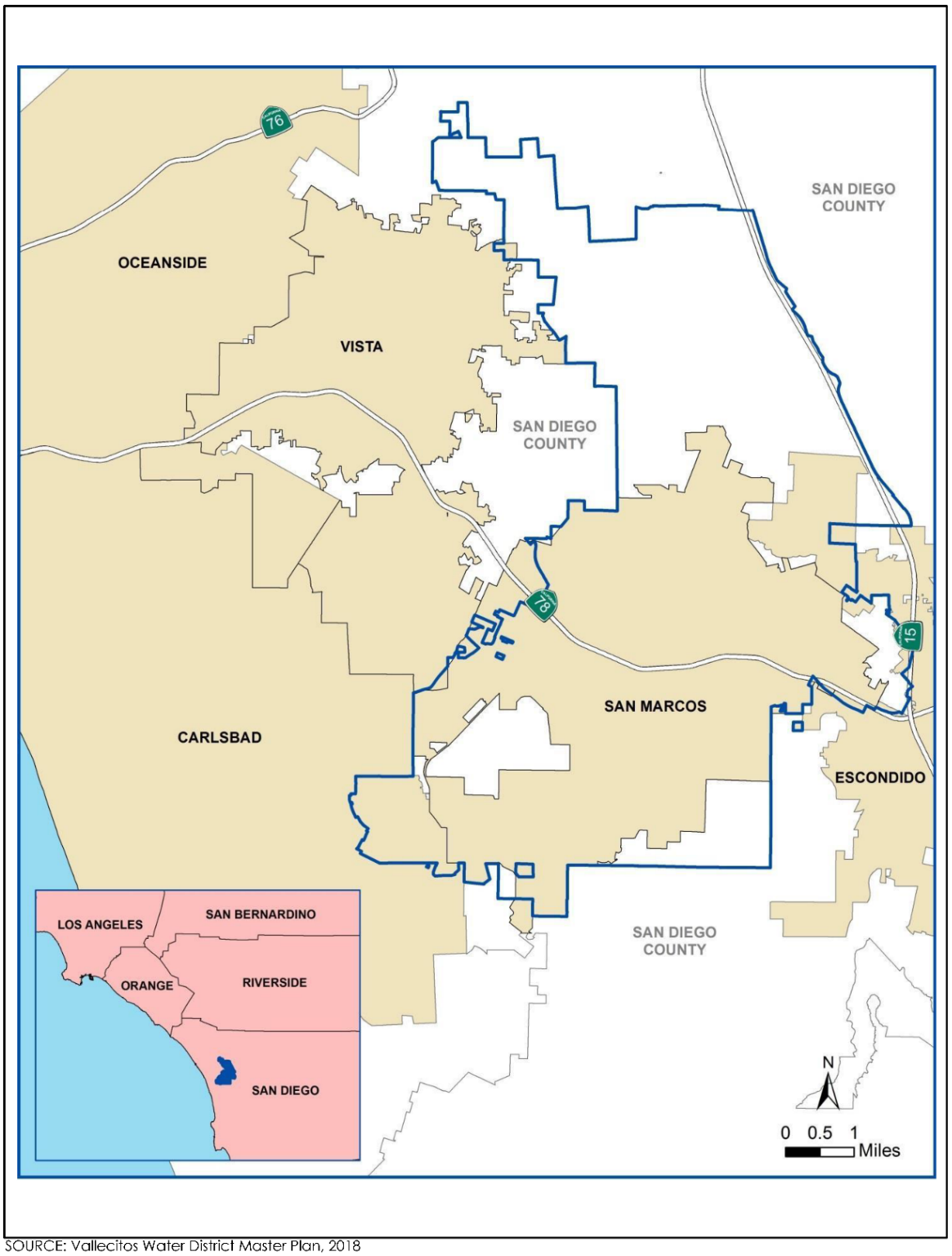
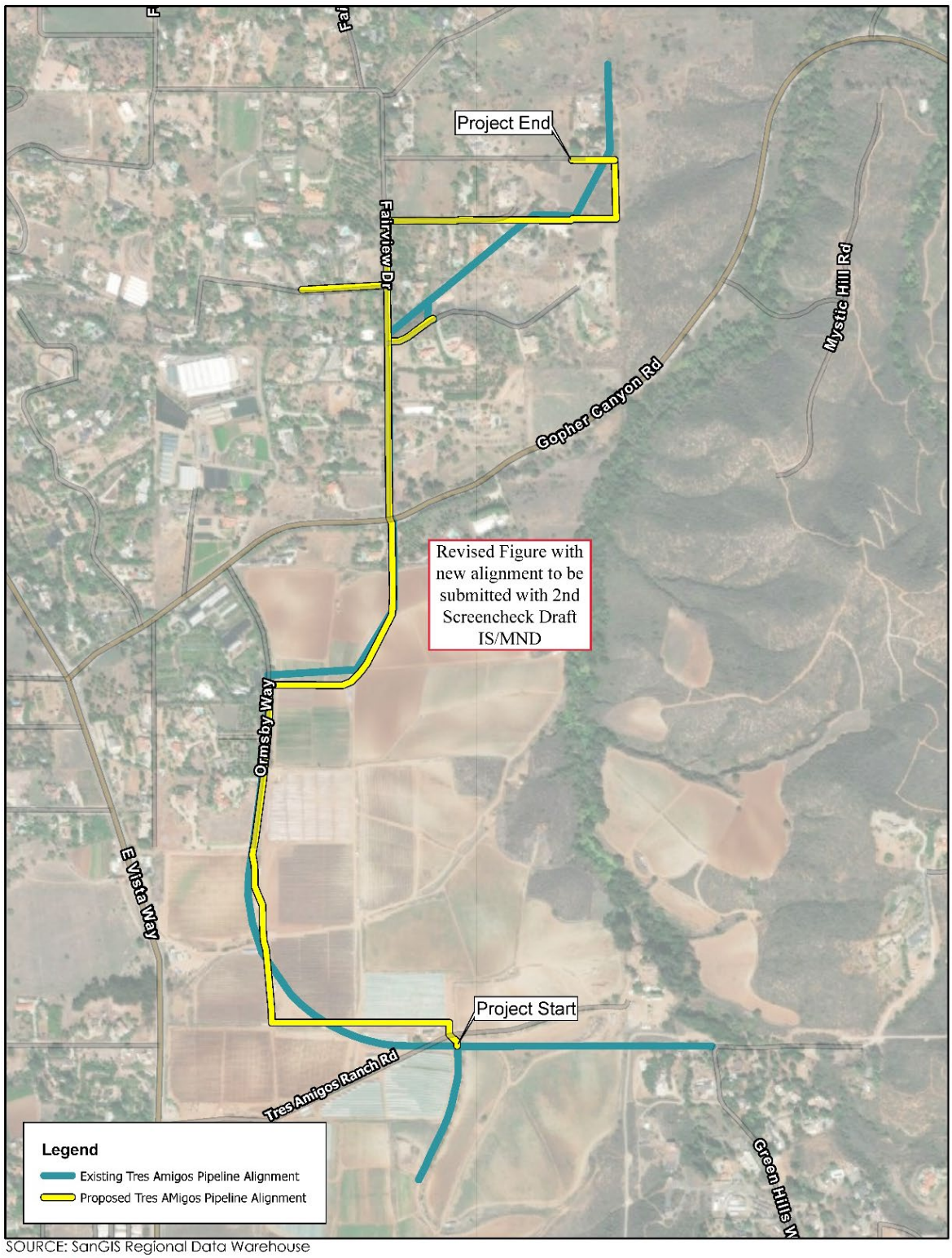


SOURCE: Vallecitos Water District Master Plan, 2018

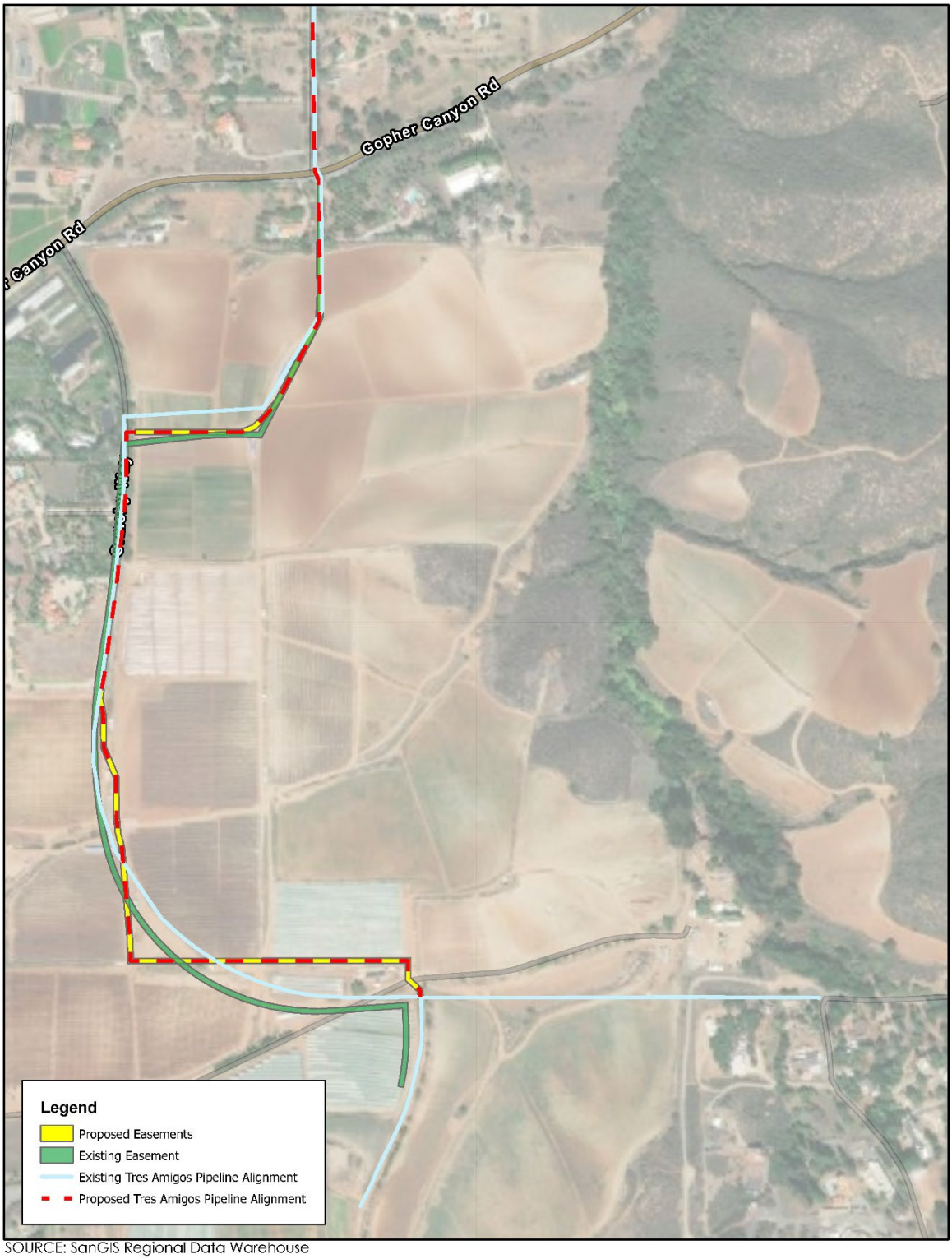
Vallecitos Water District Service Area
Tres Amigos Waterline Replacement Project
Figure 1

SOURCE: SanGIS Regional Data Warehouse

Regional Location
Tres Amigos Waterline Replacement Project
Figure 2



Project Location
Tres Amigos Waterline Replacement Project
Figure 3



SOURCE: SanGIS Regional Data Warehouse

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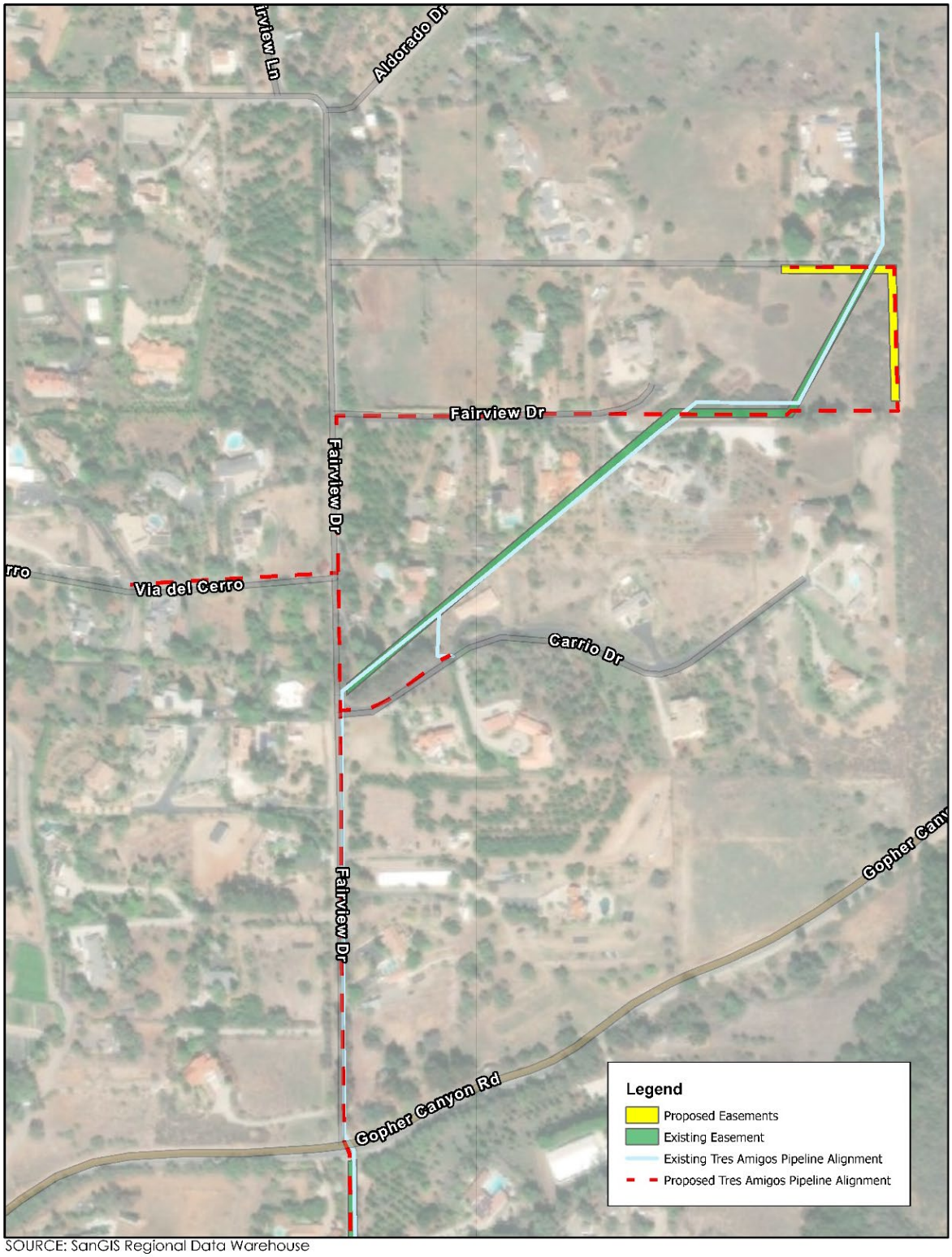
0 0.1 0.2 Miles

Proposed Alignment - Southern Segment
Tres Amigos Waterline Replacement Project
Figure 4



SOURCE: SanGIS Regional Data Warehouse

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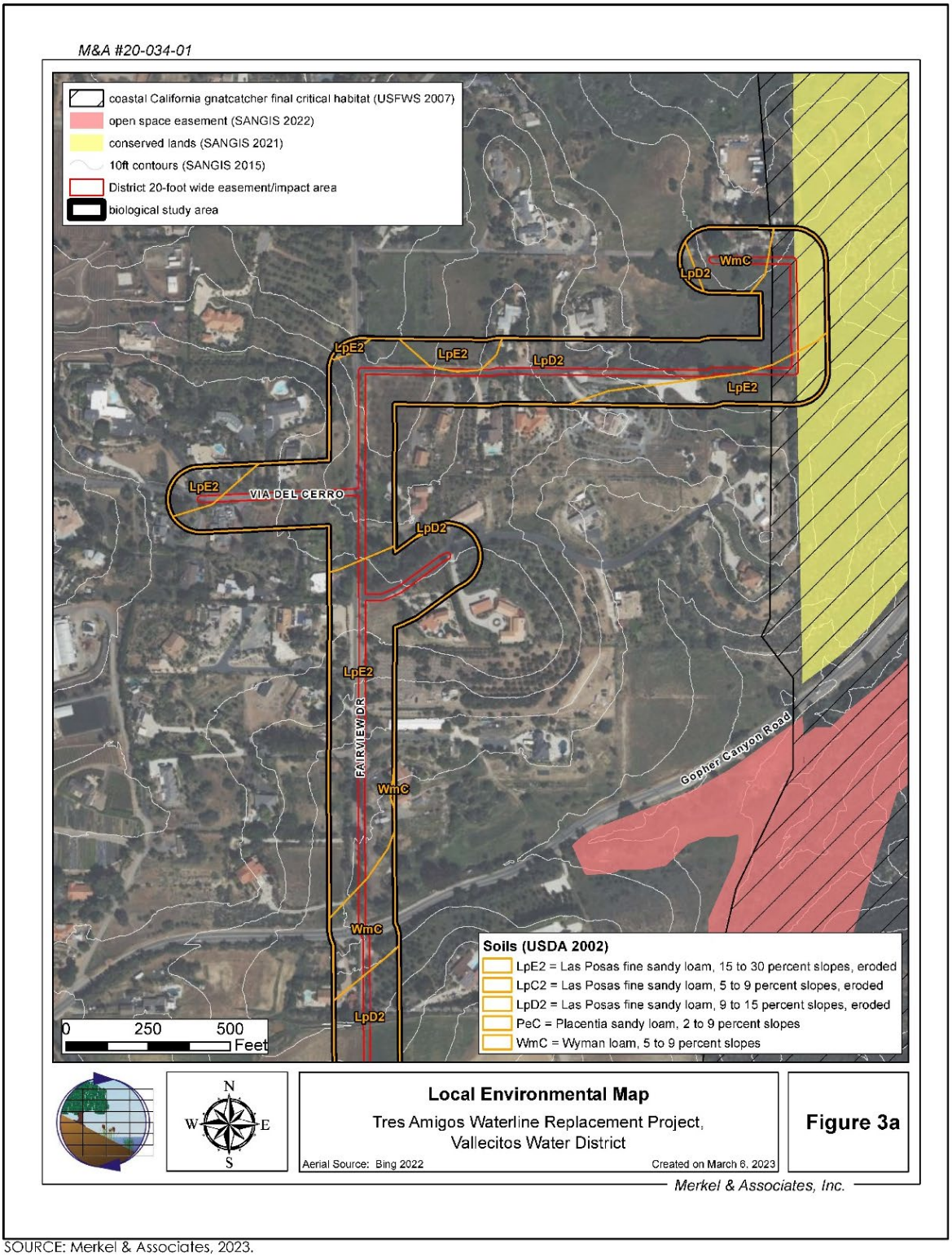
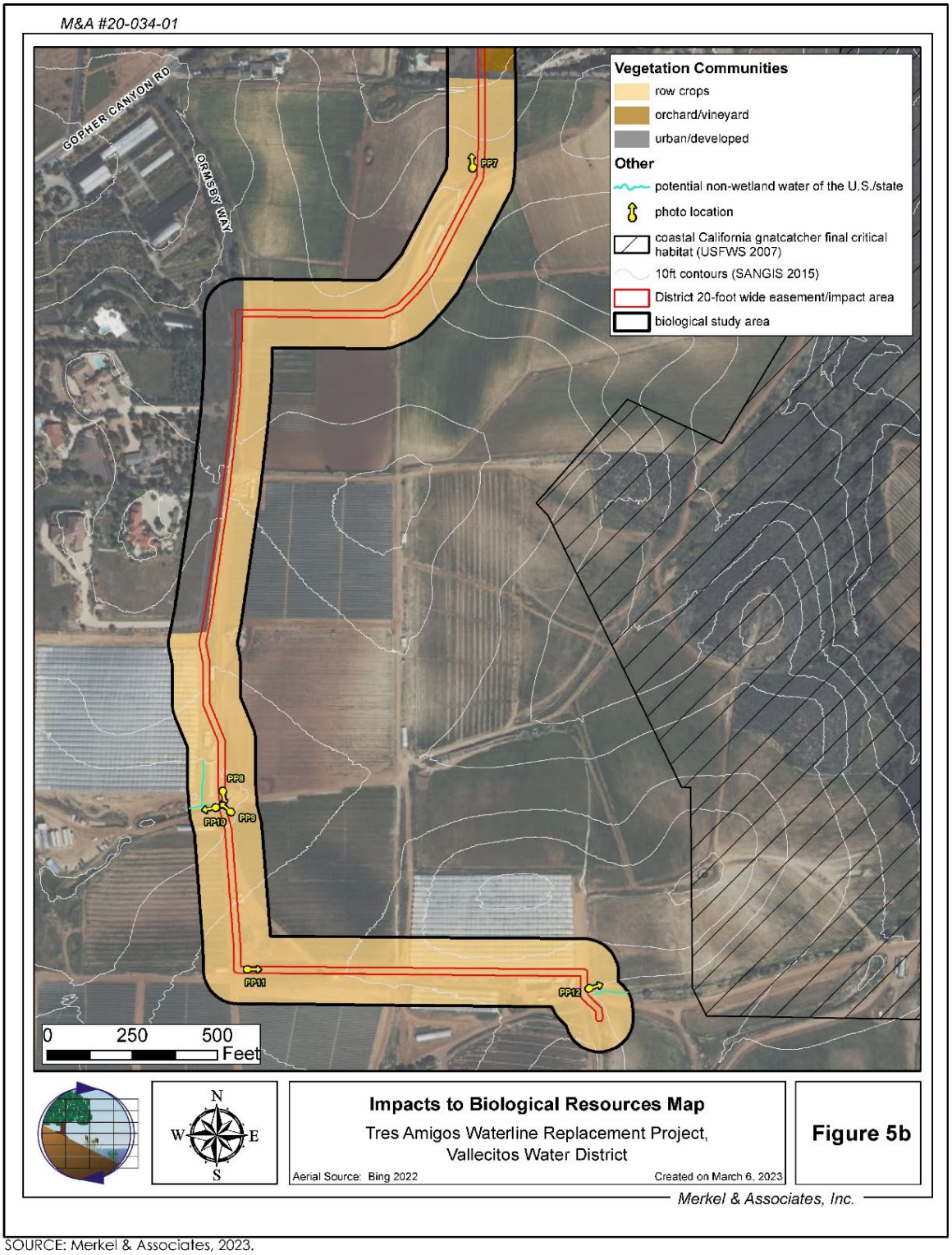
Project Alignment - Northern Segment
Tres Amigos Waterline Replacement Project
Figure 5



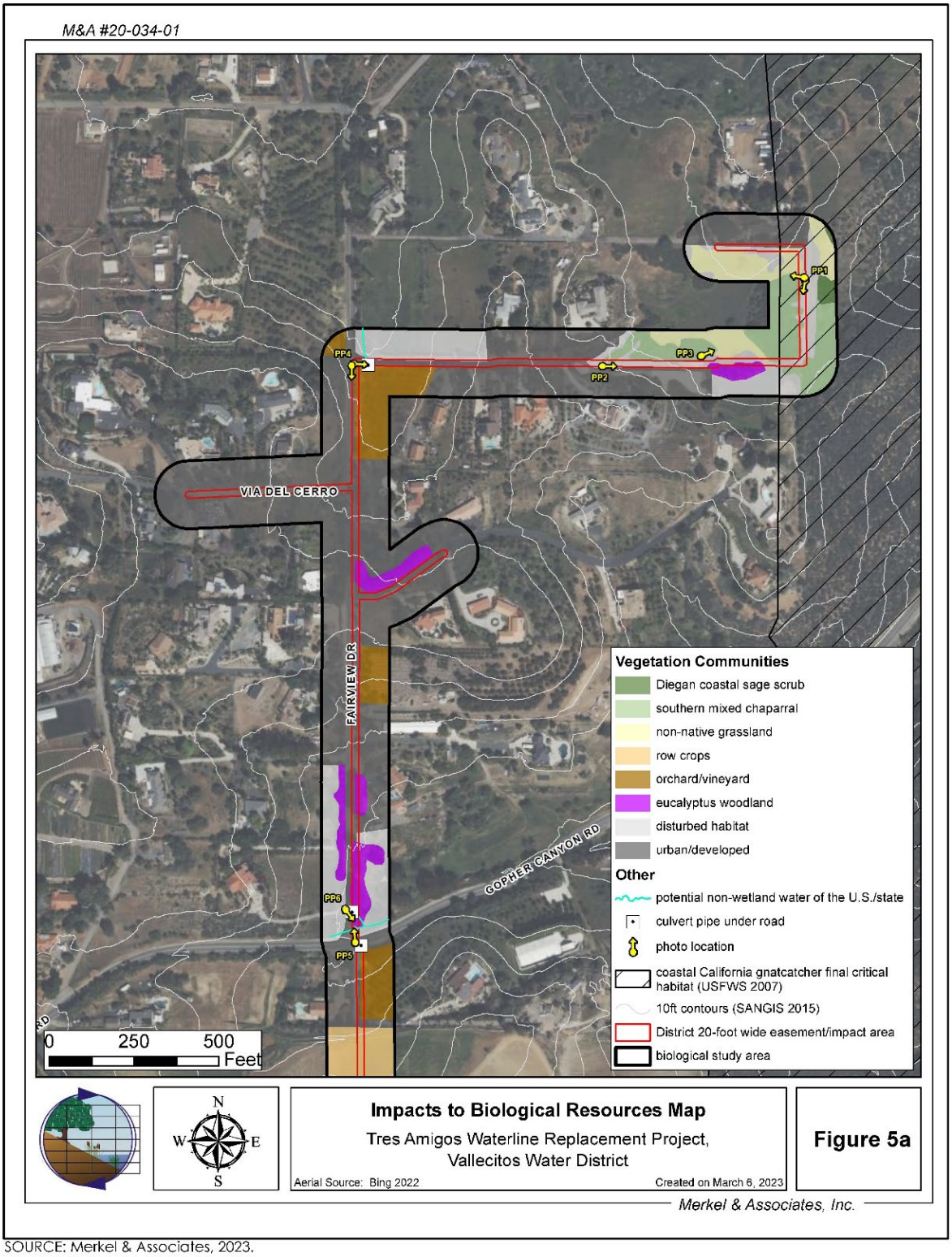
SOURCE: Merkel & Associates, 2023.

Local Biological Environment
Tres Amigos Waterline Replacement Project
Figure 6a



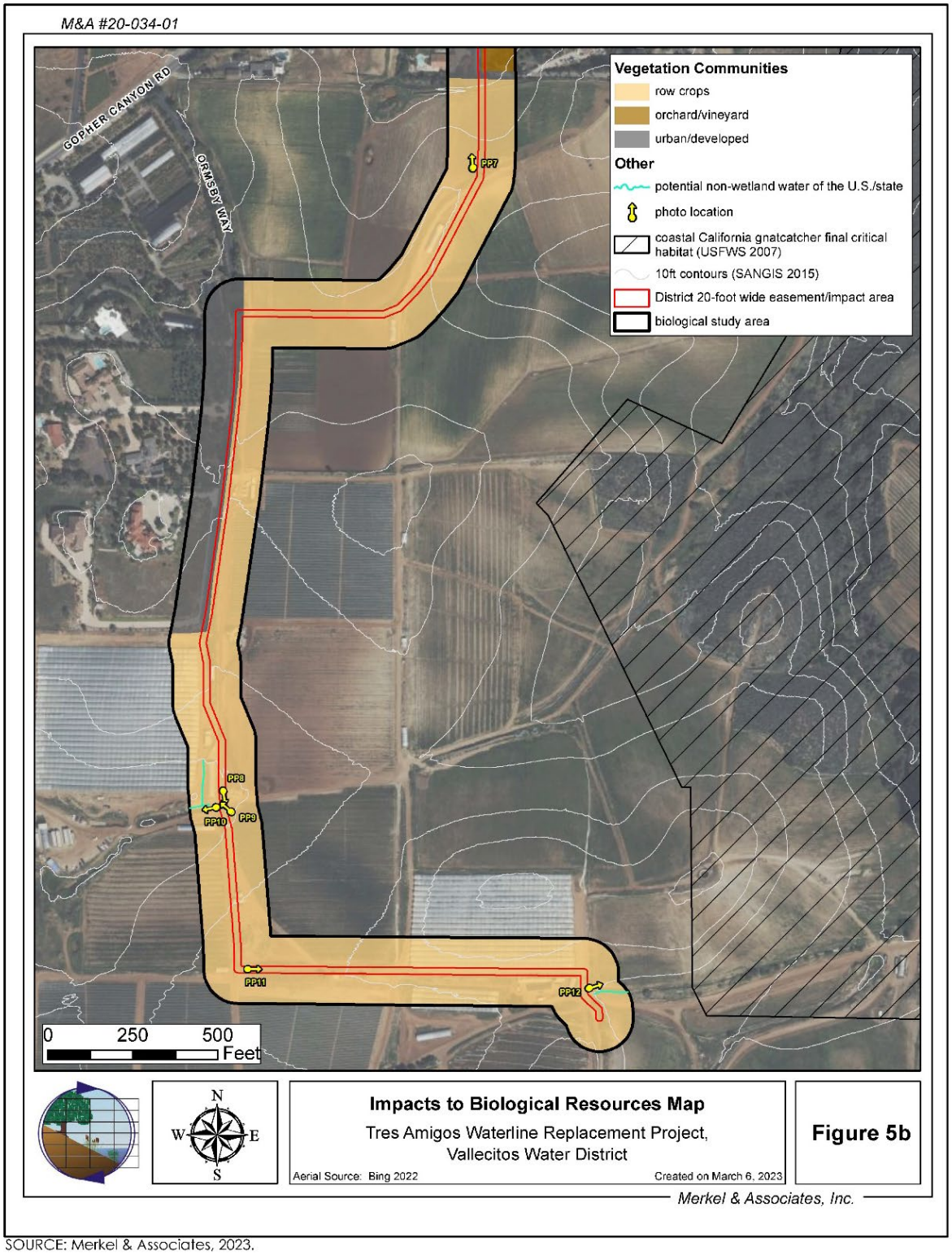
SOURCE: Merkel & Associates, 2023.

Local Biological Environment
Tres Amigos Waterline Replacement Project
Figure 6b



SOURCE: Merkel & Associates, 2023.

Biological Resources & Impacts
Tres Amigos Waterline Replacement Project
Figure 7a



SOURCE: Merkel & Associates, 2023.

Biological Resources & Impacts
Tres Amigos Waterline Replacement Project
Figure 7b

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