



# County of San Diego

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**VINCE NICOLETTI**  
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June 13, 2024

## **CEQA Initial Study - Environmental Checklist Form (Based on the State CEQA Guidelines, Appendix G)**

1. Title; Project Number(s); Environmental Log Number:

Meredith Minor Grading Plan  
PDS2020-LDGRMN-20336

2. Lead agency name and address:  
County of San Diego, Planning & Development Services  
5510 Overland Avenue, Suite 110  
San Diego, CA 92123-1239

3. a. Contact Souphalak Sakdarak, Project Manager  
b. Phone number: (619) 323-4869  
c. E-mail: Souphalak.Sakdarak@sdcounty.ca.gov.

4. Project location:  
1923 Dentro De Lomas Road  
Bonsall, CA 92003

Thomas Guide Coordinates: Page 1068, Grid C/4

5. Project Applicant name and address:  
Meredith Craig Separate Property Trust 01-18-90  
P.O Box 1968  
Newport Beach, CA 92659

6. General Plan  
Community Plan: Bonsall  
Land Use Designation: Semi-Rural 4 (SR-4)  
Density: 1 du/4 gross acre(s)  
Floor Area Ratio (FAR) -

- 7. Zoning
  - Use Regulation: Urban Residential (RU)
  - Minimum Lot Size: 2 acre(s)
  - Special Area Regulation: -

8. Description of project:

The project site is located on 1923 Dentre De Lomas in the Bonsall Community Plan within unincorporated San Diego County (APN 127-141-40-00). The project is a minor grading plan to rectify a grading violation, which was graded for future accessories for the residential use. The intended use of the property will be for residential use and no structures would be constructed with this grading plan. The project involves a balanced cut and fill of 3,500 cubic yards of materials. The site is subject to the General Plan Semi-Rural Regional Category, Semi-Rural 4 (SR-4) Land Use Designation. Zoning for the site is Rural Residential (RR). The site contains an existing single-family dwelling unit that would be retained. Access would be provided by a driveway connecting to Dentre De Lomas Road, a private road. The project would be served by an on-site septic system for sewer and a combination of groundwater and imported water from the Rainbow Municipal Water District.

9. Surrounding land uses and setting (Briefly describe the project’s surroundings):

Surrounding land uses consist of residential, agricultural uses, open space, and vacant land. The topography of the project site is relatively flat except for the northwest portion of the project site that is steeper. The site is located within two miles of Interstate 15.

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

<b>Permit Type/Action</b>	<b>Agency</b>
Improvement Plans	County of San Diego
Water Well Permit	County of San Diego
401 Permit - Water Quality Certification	Regional Water Quality Control Board (RWQCB)
404 Permit – Dredge and Fill	US Army Corps of Engineers (ACOE)
1603 – Streambed Alteration Agreement	CA Department of Fish and Wildlife (CDFW)
National Pollutant Discharge Elimination System (NPDES) Permit	RWQCB

- 11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code §21080.3.1? If so, has consultation begun?

YES

NO

Note: Conducting consultation early in the CEQA process allows tribal governments, public lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and to reduce the potential for delay and conflict in the environmental review process (see Public Resources Code §21083.3.2). Information is also available from the Native American Heritage Commission’s Sacred Lands File per Public Resources Code §5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code §21082.3(e) contains provisions specific to confidentiality.

**ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:** The environmental factors checked below would be potentially affected by this project and involve at least one impact that is a “Potentially Significant Impact” or a “Less Than Significant With Mitigation Incorporated,” as indicated by the checklist on the following pages.

- |   |  |  |
|---|--|--|
| <input type="checkbox"/> <u>Aesthetics</u>                      | <input type="checkbox"/> <u>Agriculture and Forest Resources</u> | <input type="checkbox"/> <u>Air Quality</u>                        |
| <input checked="" type="checkbox"/> <u>Biological Resources</u> | <input type="checkbox"/> <u>Cultural Resources</u>               | <input type="checkbox"/> <u>Geology &amp; Soils</u>                |
| <input type="checkbox"/> <u>Greenhouse Gas Emissions</u>        | <input type="checkbox"/> <u>Hazards &amp; Haz. Materials</u>     | <input type="checkbox"/> <u>Hydrology &amp; Water Quality</u>      |
| <input type="checkbox"/> <u>Land Use &amp; Planning</u>         | <input type="checkbox"/> <u>Mineral Resources</u>                | <input type="checkbox"/> <u>Noise</u>                              |
| <input type="checkbox"/> <u>Population &amp; Housing</u>        | <input type="checkbox"/> <u>Public Services</u>                  | <input type="checkbox"/> <u>Recreation</u>                         |
| <input type="checkbox"/> <u>Transportation/Traffic</u>          | <input type="checkbox"/> <u>Utilities &amp; Service Systems</u>  | <input type="checkbox"/> <u>Mandatory Findings of Significance</u> |

**DETERMINATION:** (To be completed by the Lead Agency)  
On the basis of this initial evaluation:

- On the basis of this Initial Study, Planning & Development Services finds that the proposed project **COULD NOT** have a significant effect on the environment, and a **NEGATIVE DECLARATION** will be prepared.
- On the basis of this Initial Study, Planning & Development Services finds 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.
- On the basis of this Initial Study, Planning & Development Services finds that the proposed project **MAY** have a significant effect on the environment, and an **ENVIRONMENTAL IMPACT REPORT** is required.

_____ Signature	_____ Date
Souphalak Sakdarak _____ Printed Name	Land Use/Environmental Planner _____ Title

## INSTRUCTIONS ON 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 must take account of 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 Incorporated, 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. “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.
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 Incorporated,” describe the mitigation measures that 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. 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

**I. AESTHETICS. Except as provided in Public Resources Code Section 21099,** Would the project:

a) Have a substantial adverse effect on a scenic vista?

- |   |  |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact                     | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact                               |

Discussion/Explanation:

**Less Than Significant Impact:**

A vista is a view from a particular location or composite views along a roadway or trail. Scenic vistas often refer to views of natural lands but may also be compositions of natural and developed areas, or even entirely of developed and unnatural areas, such as a scenic vista of a rural town and surrounding agricultural lands. What is scenic to one person may not be scenic to another, so the assessment of what constitutes a scenic vista must consider the perceptions of a variety of viewer groups.

The items that can be seen within a vista are visual resources. Adverse impacts to individual visual resources or the addition of structures or developed areas may or may not adversely affect the vista. Determining the level of impact to a scenic vista requires analyzing the changes to the vista as a whole and also to individual visual resources.

As described in the General Plan Update (GPU) Environmental Impact Report (EIR; County of San Diego 2011), the County contains visual resources affording opportunities for scenic vistas in every community. Resource Conservation Areas (RCAs) are identified within the GPU EIR and are the closest that the County comes to specifically designating scenic vistas. Many public roads in the County currently have views of RCAs or expanses of natural resources that would have the potential to be considered scenic vistas. Numerous public trails are also available throughout the County. New development can often have the potential to obstruct, interrupt, or detract from a scenic vista.

Based on a GIS review by County staff, the project site is located near or within the viewshed of a scenic vista. The closest RCAs identified on GIS to the project site are along Gopher Canyon Road, approximately 0.51 mile to the south and Old River Road with the closest point approximately 1.50 miles to the west. The project is a minor grading plan to rectify a grading violation on a residential development lot. The project involves a balanced cut and fill of 3,500 cubic yards of materials. Surrounding land uses consist of rural residential, agricultural land use, open space, and vacant land. The proposed project is grading plan which cannot be seen from within the scenic view shed. The project is compatible with the existing visual environment in terms of visual character and quality because the grading for site development is located on a downslope on the southern part of the property and not visible from those roadways. In addition, due to the distance of the project site and intervening structures, landscaping, topography, as well as the project scope which only includes grading, the project would not impact views from

any of these identified scenic vistas. Therefore, the proposed project will not have a substantial adverse effect on a scenic vista.

The project will not result in cumulative impacts on a scenic vista because the proposed project viewshed and past, present and future projects within that viewshed were evaluated to determine their cumulative effects. Refer to XXI. Mandatory Findings of Significance for a comprehensive list of the projects considered. Those projects listed in Section XXIII are located within the scenic vista's viewshed and will not contribute to a cumulative impact because: the project is a grading plan. Therefore, the project will not result in adverse project or cumulative impacts 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?

- |   |  |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact                     | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact                               |

Discussion/Explanation:

**Less Than Significant Impact:**

State scenic highways refer to those highways that are officially designated by the California Department of Transportation (Caltrans) as scenic ([Caltrans - California Scenic Highway Program](#)). Generally, the area defined within a State scenic highway is the land adjacent to and visible from the vehicular right-of-way. The dimension of a scenic highway is usually identified using a motorist's line of vision, but a reasonable boundary is selected when the view extends to the distant horizon. The scenic highway corridor extends to the visual limits of the landscape abutting the scenic highway.

The project site is not located near or visible within the composite viewshed of a State scenic highway and will not damage or remove visual resources within a State Scenic highway. The closest State-designated Scenic Highway, is State Route 78, which is approximately 31 miles southeast of the project site. However, State Route 76, approximately 1.5 miles west of the project site, is identified by Caltrans as eligible for a Scenic highway designation. The County has also identified roadways through GIS, that are considered County Scenic Highways. Gopher Canyon Road located at approximately 0.51 mile south of the project site and Old River Road with the closest point approximately 1.50 miles to the west. No trees, rock outcroppings, or historic buildings would be removed as part of the project. In addition, due to the limited grading that is required, the existing site setting, and the speed of travel by cars on those roadways, and existing topographies, visual resource impacts to those roadways would be minimal during grading.

The project will not result in cumulative impacts on a scenic vista because the proposed project viewshed and past, present and future projects within that viewshed were evaluated to determine their cumulative effects. Refer to XXI. Mandatory Findings of Significance for a comprehensive

list of the projects considered. Those projects listed in Section XXII are located within the scenic vista's viewshed and will not contribute to a cumulative impact because: the proposed project is a grading permit. Therefore, the project will not result in any adverse project or cumulative level effect on a scenic resource within a State scenic highway.

- c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

- |   |  |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact                     | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact                               |

Discussion/Explanation:

**Less Than Significant Impact:** Visual character is the objective composition of the visible landscape within a viewshed. Visual character is based on the organization of the pattern elements line, form, color, and texture. Visual character is commonly discussed in terms of dominance, scale, diversity, and continuity. Visual quality is the viewer's perception of the visual environment and varies based on exposure, sensitivity, and expectation of the viewers. The Bonsall Community Plan describes Bonsall's community character as primarily low-density residential, agricultural, and equestrian uses surrounded by large open spaces composed of fallow fields, undisturbed native vegetation, and agriculture.

The project site is located in an urbanized area and has an existing single family dwelling unit on the site. The project is a minor grading permit to rectify a grading violation on a residential development lot. The proposed grading will not conflict with any zoning or other regulations governing the scenic quality. Due to the minimal grading required, the project would not substantially degrade the existing visual character or quality of public views. In addition, the project is for future residential pads, which will be consistent with the community character, which allows semi-rural residential uses.

- d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?

- |   |   |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact                     | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact         |

Discussion/Explanation:

**No Impact:** The proposed project is a grading plan and does not propose any use of outdoor lighting or building materials with highly reflective properties such as highly reflective glass or high-gloss surface colors. As such, it will not adversely affect nighttime views or astronomical



observations, because the project will conform to the Light Pollution Code (Section 51.201-51.209). The proposed project is a minor grading permit to rectify a grading violation on a residential development lot. Construction would occur between the hours of 7:00 a.m. to 7:00 p.m., and so would not involve long durations of nighttime work. Therefore, the project will not create any new sources of light pollution that could contribute to skyglow, light trespass or glare and adversely affect day or nighttime views in area.

## **II. AGRICULTURE AND FORESTRY RESOURCES**

a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide or local Importance (Important Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, or other agricultural resources, to non-agricultural use?

- |   |   |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact                     | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact         |

Discussion/Explanation:

**No Impact:** The project site does not contain any agricultural resources, lands designated as Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency. The project site as well as surrounding areas are currently developed with an existing single family dwelling unit. The project site consists of an existing single-family dwelling unit that will remain. Therefore, no agricultural resources including Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance will be converted to a non-agricultural use.

b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?

- |   |   |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact                     | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact         |

Discussion/Explanation:

**No Impact:** The project site is zoned Rural Residential (RR), which is not considered to be an agricultural zone. Additionally, the project site's land is not under a Williamson Act Contract. The proposed project is a minor grading plan to rectify a grading violation on a residential lot. The project site is also developed with existing single family dwelling unit to remain. There are parcels with agricultural zones to the north and south of the project site, however, those parcels are mainly developed with single family dwelling unit. Therefore, the project does not conflict with existing zoning for agricultural use, or a Williamson Act Contract.

c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), or timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

- |   |   |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact                     | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact         |

Discussion/Explanation:

**No Impact:** The project site including offsite improvements do not contain forest lands or timberland. The County of San Diego does not have any existing Timberland Production Zones. In addition, the project is consistent with existing zoning and a rezone of the property is not proposed. Therefore, project implementation would not conflict with existing zoning for, or cause rezoning of, forest land, timberland or timberland production zones.

d) Result in the loss of forest land or conversion of forest land to non-forest use, or involve other changes in the existing environment, which, due to their location or nature, could result in conversion of forest land to non-forest use?

- |   |   |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact                     | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact         |

Discussion/Explanation:

**No Impact:** The project site including any offsite improvements do not contain any forest lands as defined in Public Resources Code section 12220(g), therefore project implementation would not result in the loss or conversion of forest land to a non-forest use. In addition, the project is not located in the vicinity of offsite forest resources.

e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Important Farmland or other agricultural resources, to non-agricultural use or conversion of forest land to non-forest use?

- |   |  |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact                     | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact                               |

Discussion/Explanation:

**Less Than Significant Impact:** The project site and parcels to the east and west are zoned for residential use, however within radius of one mile of the project site, there are parcels that consist of agricultural zone. As a result, the proposed project was reviewed by County staff and it was

determined not to have significant adverse impacts related to the conversion of Prime Farmland, Unique Farmland, Farmland of Statewide or Local Importance or active agricultural operations to a non-agricultural use for the following reasons: the project site is currently developed with a single-family dwelling unit, which as an allowed-by-right use intended by the RR zone. Active agricultural operations in the surrounding area are currently mixed with single family residential uses. The proposed grading use would not significantly change the existing land uses in the area, resulting in a change that could convert agricultural operations to a non-agricultural use. The grading permit will rectify a grading violation on an existing residential development site.

Therefore, no potentially significant project or cumulative level conversion of Prime Farmland, Unique Farmland, Farmland of Statewide Importance, or Farmland of Local Importance to a non-agricultural use will occur as a result of this project.

**III. 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:

a) Conflict with or obstruct implementation of the San Diego Regional Air Quality Strategy (RAQS) or applicable portions of the State Implementation Plan (SIP)?

- |   |  |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact                     | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact                               |

Discussion/Explanation:

**Less Than Significant Impact:** The proposed project is a grading permit to rectify a grading violation on a residential developed lot. Future development on the project site will comply with the density levels that were anticipated in the SANDAG growth projections used in development of the RAQS and SIP. Operation of the project will result in emissions of ozone precursors that were considered as a part of the RAQS based on growth projections. As such, the proposed project is not expected to conflict with either the RAQS or the SIP. In addition, the operational emissions from the project are below the screening levels, and subsequently will not violate ambient air quality.

b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

- |   |  |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact                     | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact                               |

Discussion/Explanation:

**Less Than Significant Impact:** San Diego County is presently in non-attainment for the 8-hour concentrations for Ozone (O<sub>3</sub>) under the California Ambient Air Quality Standard (CAAQS) and National Ambient Air Quality Standard (NAAQS). San Diego County is also in non-attainment for 1-hour concentrations for O<sub>3</sub> under the CAAQS. O<sub>3</sub> is formed when volatile organic compounds (VOCs) and nitrogen oxides (NO<sub>x</sub>) react in the presence of sunlight. VOC sources include any source that burns fuels (e.g., gasoline, natural gas, wood, oil); solvents; petroleum processing and storage; and pesticides. Additionally, San Diego County is presently in non-attainment for the annual geometric mean and for the 24-hour concentrations of Particulate Matter (PM) less than or equal to 10 microns (PM<sub>10</sub>) and PM less than or equal to 2.5 microns (PM<sub>2.5</sub>) under the CAAQS. Sources of PM<sub>10</sub> and PM<sub>2.5</sub> in both urban and rural areas include motor vehicles, wood burning stoves and fireplaces, dust from construction, landfills, agriculture, wildfires, brush/waste burning, and industrial sources of windblown dust from open lands.

Air quality emissions associated with the Project include emissions from construction of the project.

The County has identified SLTs which incorporate the San Diego Air Pollution Control District’s (SDAPCD’s) established air quality impact analysis trigger levels for all new source review in SDAPCD Rule 20.2 and Rule 20.3. These SLTs identified in the County Guidelines can be used as numeric methods to demonstrate that a project’s total emissions (e.g., stationary, fugitive dust, and mobile emissions) would not result in a significant impact to air quality (see Table 1 below). SLTs for VOCs are based on the threshold of significance for VOCs from the South Coast Air Quality Management District (SCAQMD) for the Coachella Valley (which is more appropriate for the San Diego Air Basin). The County’s SLTs were developed in support of State and federal ambient air quality standards that are protective of human health.

**Table 1. San Diego County Screening-Level Thresholds for Air Quality Impact Analysis**

Pollutant	Total Emissions		
	Lbs. per Hour	Lbs. per Day	Tons per Year
Respirable Particulate Matter (PM <sub>10</sub> )	---	100	15
Fine Particulate Matter (PM <sub>2.5</sub> )	--- *	55	10*
Nitrogen Oxides (NO <sub>x</sub> )	25	250	40
Sulfur Oxides (SO <sub>x</sub> )	25	250	40
Carbon Monoxide (CO)	100	550	100
Lead	---	3.2	0.6
Volatile Organic Compounds (VOCs)	---	75**	13.7***

Notes: \* USEPA “Proposed Rule to Implement the Fine Particle National Ambient Air Quality Standards” published September 8, 2005. Also used by the SCAQMD.

\*\* Threshold for VOCs based on the threshold of significance for VOCs from the SCAQMD for the Coachella Valley.

\*\*\* 13.7 Tons Per Year threshold based on 75 lbs/day multiplied by 365 days/year and divided by 2,000 lbs/ton.

Air quality emissions associated with the project would include PM, NO<sub>x</sub>, CO, and VOCs from grading activities. The project would not contribute to any operational sources outside of existing conditions because no new development is proposed, and no long-term emissions from mobile

or other sources would be produced once the construction activities are complete. The project would grade a balanced cut and fill of 3,500 cubic yards of materials and requires minimal work to remedy the code violation case. This is based on the grading schedule requiring 9 to 12 weeks of work, with no import or export of material required. In addition, grading operations associated with the project would be subject to the County of San Diego Grading Ordinance and the San Diego Air Pollution Control District (SDAPCD) Rule 55, which requires the implementation of dust control measures (e.g., watering, application of surfactants, control of vehicle speeds) during grading activities. An analysis of estimated construction emissions from project grading was completed using SCAQMD’s California Emissions Estimator Model (CalEEMod). As shown in Table 2 below, project-related air emissions are not anticipated to reach screening-level thresholds identified in Table 1 as established by the San Diego County APCD. Therefore, the project would not result in substantial emissions such that any criteria pollutant air quality standard would be violated. Therefore, the project would not result in a cumulatively considerable net increase of any criteria pollutant; impacts would be less than significant.

**Table 2. Estimated Project-Related Air Emissions**

<b>Pollutant</b>	<b>Project Emissions (Lbs. per Day)</b>	<b>Screening-Level Thresholds (Lbs. per Day)</b>	<b>Above Threshold?</b>
Respirable Particulate Matter (PM <sub>10</sub> )	19.81	100	No
Fine Particulate Matter (PM <sub>2.5</sub> )	10.14	55	No
Nitrogen Oxides (NO <sub>x</sub> )	36.01	250	No
Sulfur Oxides (SO <sub>x</sub> )	0.06	250	No
Carbon Monoxide (CO)	33.79	550	No
Volatile Organic Compounds (VOCs)	3.72	75	No

Note: CalEEMod does not report on lead emissions and therefore, it is not included in this analysis.

In addition, a list of past, present and future projects within the surrounding area were evaluated and none of these projects emit significant amounts of criteria pollutants. Refer to XVIII. Mandatory Findings of Significance for a comprehensive list of the projects considered. The proposed project as well as the past, present and future projects within the surrounding area, have emissions below the screening-level criteria established by the LUEG guidelines for determining significance, therefore, the construction and operational emissions associated with the proposed project are not expected to create a cumulatively considerable impact nor a considerable net increase of PM10, or any O<sub>3</sub> precursors.

c) Expose sensitive receptors to substantial pollutant concentrations?

- Potentially Significant Impact
- Less than Significant Impact
- Less Than Significant With Mitigation Incorporated
- No Impact

Discussion/Explanation:

**Less Than Significant Impact:** Air quality regulators typically define sensitive receptors as schools (Preschool-12<sup>th</sup> Grade), hospitals, resident care facilities, or day-care centers, or other facilities that may house individuals with health conditions that would be adversely impacted by changes in air quality. The County of San Diego also considers residences as sensitive receptors since they house children and the elderly.

The project will not introduce a new “sensitive receptor” into the project area as the project site is developed with an existing residence. The project is a grading plan to rectify a grading violation on a residential development lot. In addition, the project does not propose uses or activities that would result in exposure of these sensitive receptors to significant pollutant concentrations and will not place sensitive receptors near carbon monoxide hotspots.

Further, the project will not contribute to a cumulatively considerable exposure of sensitive receptors to substantial pollutant concentrations because proposed project as well as the listed projects have emissions below the screening-level criteria established by the LUEG guidelines for determining significance.

d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

- |   |  |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact                     | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact                               |

Discussion/Explanation:

**Less Than Significant Impact:** The Project could produce objectionable odors during the construction phases from exhaust from construction engine equipment. However, due to the dispersive nature of odors and short-term, temporary nature of these activities, these impacts would be fairly short-lived and would not cause objectionable odors affecting a substantial number of people. Furthermore, the Project would be subject to SDAPCD Rule 51, Nuisance Rule, which prohibits emissions of any material that causes nuisance to a considerable number of persons or endangers the comfort, health, or safety of any person. The Project would not result in the generation of objectionable odors. Thus, the Project would not create objectionable odors affecting a substantial number of people during construction or operation.

**IV. BIOLOGICAL RESOURCES** -- Would the project:

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 CDFW, or U.S. Fish and Wildlife Service?

- |   |   |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
|---|---|

- Less Than Significant With Mitigation Incorporated       No Impact

Discussion/Explanation:

**Less Than Significant with Mitigation Incorporated:** Based on an analysis of the County's Geographic Information System (GIS) records, the County's Comprehensive Matrix of Sensitive Species, and a Biological Resource Letter Report dated January 2024, prepared by Vince Scheidt, it has been determined that the site, and/or surrounding area, supported native vegetation, namely, coastal sage scrub and riparian habitat. No special status plant or animal species were observed onsite. The project would result in impacts to 3.76 acres of coastal sage scrub and 0.45 acres of riparian habitat. However, staff has determined that removal of this habitat will not result in substantial adverse effects with the incorporation of mitigation. The proposed mitigation consists of the offsite purchase of 18.8 acres (5:1 ratio) of coastal sage scrub mitigation credits and 1.35 acres (3:1 ratio) of riparian habitat mitigation credits within a County approved mitigation bank. The project will also be required to obtain a Habitat Loss Permit (HLP). Therefore, the impact is less than significant with mitigation incorporated.

- 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 US Fish and Wildlife Service?

- Potentially Significant Impact       Less than Significant Impact  
 Less Than Significant With Mitigation Incorporated       No Impact

Discussion/Explanation:

**Less Than Significant with Mitigation Incorporated:** Based on an analysis of the County's Geographic Information System (GIS) records, the County's Comprehensive Matrix of Sensitive Species, and a Biological Resource Letter Report dated January 2024, prepared by Vince Scheidt, it has been determined that the site, and/or surrounding area, supported native vegetation, namely, coastal sage scrub and riparian habitat. The project would result in impacts to 3.76 acres of coastal sage scrub and 0.45 acres of riparian habitat. Mitigation measures have been incorporated regarding the coastal sage scrub and riparian habitat as described in part (a). Therefore, project impacts to any riparian habitat or sensitive natural community identified in the County of San Diego Multiple Species Conservation Program, County of San Diego Resource Protection Ordinance, Natural Community Conservation Plan, Fish and Wildlife Code, Endangered Species Act, Clean Water Act, or any other local or regional plans, policies or regulations, are considered less than significant with the incorporation of mitigation.

- c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

- Potentially Significant Impact       Less than Significant Impact

- Less Than Significant With Mitigation Incorporated       No Impact

Discussion/Explanation:

**Less Than Significant with Mitigation Incorporated:** Based on an analysis of the County's Geographic Information System (GIS) records, the County's Comprehensive Matrix of Sensitive Species, and a Biological Resource Letter Report dated January 2024, prepared by Vince Scheidt, it has been determined that an upland swale is located on the property. This watercourse qualifies as a Waters of the State. Forensic evidence indicates that this feature supported riparian habitat prior to grading. Mitigation for impacts to this watercourse will be completed by obtaining permits or evidence that permits are not required from California Department of Fish and Wildlife (CDFW), Regional Water Quality Control Board (RWQCB), and the U.S. Army Corps of Engineers (ACOE).

- 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 Impact  
 Less Than Significant With Mitigation Incorporated       No Impact

Discussion/Explanation:

**Less than Significant Impact:** Based on an analysis of the County's Geographic Information System (GIS) records, the County's Comprehensive Matrix of Sensitive Species, and a Biological Resource Letter Report dated January 2024, prepared by Vince Scheidt, it has been determined that due to the project site's size and disturbed nature, the site has limited biological value and impedance of the movement of any native resident or migratory fish or wildlife species, the use of an established native resident or migratory wildlife corridors, and the use of native wildlife nursery sites would not be expected as a result of the proposed project for the following reasons.

- e) Conflict with the provisions of any adopted Habitat Conservation Plan, Natural Communities Conservation Plan, other approved local, regional or state habitat conservation plan or any other local policies or ordinances that protect biological resources?

- Potentially Significant Impact       Less than Significant Impact  
 Less Than Significant With Mitigation Incorporated       No Impact

Discussion/Explanation:



**Less Than Significant Impact:** Refer to the attached Ordinance Compliance Checklist dated June 13, 2024 for further information on consistency with any adopted Habitat Conservation Plan, Natural Communities Conservation Plan, other approved local, regional or state habitat conservation plan, including, Habitat Management Plans (HMP), Special Area Management Plans (SAMP), or any other local policies or ordinances that protect biological resources including the Multiple Species Conservation Program (MSCP), Biological Mitigation Ordinance, Resource Protection Ordinance (RPO), Habitat Loss Permit (HLP).

**V. CULTURAL RESOURCES** -- Would the project:

a) Cause a substantial adverse change in the significance of a historical resource pursuant to 15064.5?

- |   |   |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact                     | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact         |

Discussion/Explanation:

**No Impact:** Based on an analysis of County of San Diego archaeology resource files, historic records, maps, and aerial photographs by County of San Diego senior adjunct archaeologist, it has been determined that the project site does not contain any historical resources. Therefore, the project would not result in impacts to historical resources.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to 15064.5?

- |   |  |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact                     | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact                               |

Discussion/Explanation:

**Less Than Significant Impact:** Based on an analysis of County of San Diego archaeology resource files, archaeological records, maps, and aerial photographs by County of San Diego senior adjunct staff archaeologist, as well as consultation with local tribes, it has been determined that the project site does not contain any archaeological resources. The project is a grading permit to authorize grading that has taken place without benefit of permit, and no additional grading is proposed. A cultural impact fee for the unauthorized grading was required and has been paid to consulting tribes.

c) Disturb any human remains, including those interred outside of *dedicated* cemeteries?

- |   |   |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact                     | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact         |

Discussion/Explanation:

**No Impact:** Based on an analysis of County of San Diego archaeology resource files, archaeological records, maps, and aerial photographs by County of San Diego senior adjunct archaeologist, it has been determined that the project will not disturb any human remains because the project site does not include a formal cemetery or any archaeological resources that might contain interred human remains.

**VI. ENERGY. Would the project:**

- a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

- |   |  |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact                     | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact                               |

Discussion/Explanation:

**Less Than Significant Impact:** The project applicant has an open code violation case with the County of San Diego, and the grading permit is considered a necessary permit to remedy the code violation and ensuring the site complies with all applicable ordinances and regulations. The project would result in the use of energy resources during the grading phase. During grading, the project would require the use of heavy construction equipment that would be fueled by gas and diesel. However, the energy use would be temporary, limited, and cease upon completion of grading activities (approximately 9 to 12 weeks of work) and no offsite import or export of soil material is required. Construction would be conducted in compliance with local, state, and federal regulations (e.g., USEPA and the California Air Resources Board [CARB] engine emission standards, which require highly efficient combustion systems that maximize fuel efficiency and reduce unnecessary fuel consumption, and limitations on engine idling times, etc.). Compliance with these regulations would minimize short-term energy demand during the project's grading to the extent feasible. Energy needs for the project grading would be temporary and are not anticipated to require additional capacity or substantially increase peak or base period demands for electricity and other forms of energy. During project construction, energy would be consumed in the form of electricity associated with the conveyance of water used for dust control and, on a limited basis, powering lights, electronic equipment, or other construction activities necessitating electrical power. As such, the Project's energy consumption during the grading and construction phase would not be considered wasteful, inefficient, or unnecessary. In addition, natural gas is not anticipated to be required during construction of the Project. Any minor amounts of natural gas that may be consumed as a result of the grading and construction

would be temporary and negligible and would not have an adverse effect. Therefore, no significant impact to energy resources would result.

**b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?**

- |   |  |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact                     | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact                               |

Discussion/Explanation:

**Less than Significant Impact:** Relevant plans that pertain to the efficient use of energy include the 2019 California Energy Efficiency Action Plan, which focuses on energy efficiency. As noted, grading activities would be conducted in compliance with local, state, and federal regulations (e.g., USEPA and CARB engine emissions standards, limitations on engine idling times, etc.). Compliance with these regulations would reduce short-term energy demand during the project’s grading to the extent feasible and increase the project’s energy efficiency. Therefore, the project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Project impacts would be less than significant.

**VII. GEOLOGY AND SOILS** -- Would the project:

- a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:
  - i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

- |   |   |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact                     | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact         |

Discussion/Explanation:

**No Impact:** The Alquist-Priolo Earthquake Fault Zoning Act is a California state law that was developed to regulate development near active faults in order to reduce losses from surface fault rupture and other hazards. Based on County’s records, the projects site is not located in a fault rupture hazard zone identified by the Alquist-Priolo Earthquake Fault Zoning Act, Special Publication 42, Revised 1997, Fault-Rupture Hazards Zones in California, or located within any other area with substantial evidence of a known fault. The nearest identified Alquist-Priolo Fault Zone is approximately 12.37 miles east of the project site. The project is a minor grading permit to rectify a grading violation on a residential development lot. A Geotechnical Investigation Report prepared by Advance Geotechnical Solutions, Inc dated December 7, 2021, evaluated

the as-graded condition of the grading violation area in order to provide suitability of the site and any recommended remedial. Based on the report no further geology review is required as grading does not involve occupancy or any buildings or structures. The intended use of the property will be for equestrian and/or agricultural use, and that the fill soils in their current condition will support such a use. Any newly required grading will be carried out in accordance with the recommendations set forth by the County Grading Ordinance. Therefore, there will be no impact from the exposure of people or structures to adverse effects from a known fault-rupture hazard zone as a result of this project.

ii. Strong seismic ground shaking?

- |   |  |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact                     | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact                               |

Discussion/Explanation:

**Less Than Significant Impact:** The proposed project is a major grading permit to remedy the grading violation on a residential lot. No structure will be constructed, that would be impacted by strong seismic shaking. To ensure the structural integrity of the site slopes, a Grading Plan and a Geotechnical Investigation have been prepared by a registered Civil Engineer and reviewed for approval by County Engineers. The project grading must conform to the grading requirements outlined in the County Grading, Clearing, and Watercourses Ordinance (Grading Ordinance) and be verified in the field by a licensed or registered Civil Engineer and inspected by County Grading Inspectors. Therefore, the Grading Plan and the Geotechnical Investigation prepared by the registered Civil Engineer and compliance with the Grading Ordinance, ensures the project will not result in a potentially significant impact from the exposure of people or structures to potential adverse effects from strong seismic ground shaking.

iii. Seismic-related ground failure, including liquefaction?

- |   |  |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact                     | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact                               |

Discussion/Explanation:

**Less Than Significant Impact:** Liquefaction typically occurs when a site is located in a zone with seismic activity, onsite soils are cohesionless (such as sand or gravel), groundwater is encountered within 50 feet of the surface, and soil relative densities are less than about 70 percent. The project site is not within a "Potential Liquefaction Area" as identified in the County Guidelines for Determining Significance for Geologic Hazards. This indicates that the liquefaction potential at the site is low. According to the Geotechnical Investigation Report prepared for the project site, groundwater was not encountered during the exploratory excavations. No natural groundwater condition is known to exist at the site that would impact the

proposed site development. However, it should be noted that localized perched groundwater may develop later, most likely at or near fill/bedrock contacts, due to fluctuations in precipitation, irrigation practices, or factors not evident at the time of the field explorations. Furthermore, the site is not underlain by poor artificial fill or located within a floodplain. Therefore, there will be a less than significant impact from the exposure of people or structures to adverse effects from a known area susceptible to ground failure, including liquefaction. Furthermore, the proposed project is a grading plan on a residential use lot, no structures will be constructed with this grading permit. Since liquefaction potential at the site is low, earthquake-induced lateral spreading is not considered to be a seismic hazard at the site and impacts would be less than significant.

iv. Landslides?

- |   |  |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact                     | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact                               |

Discussion/Explanation:

**Less Than Significant Impact:** Landslides occur when masses of rock, earth, or debris move down a slope, including rock falls, deep failure of slopes, and shallow debris flows. Landslides are influenced by human activities such as grading and other construction activities, irrigation of slopes, mining activity, etc. and by natural factors such as precipitation, geology/soil types, surface/subsurface flow of water, and topography. Frequently, they may be triggered by other hazards such as floods and earthquakes. Landslides result from one or more distinct failure surfaces at rates that vary from a few centimeters per day to tens of meters of instantaneous movement. The most common cause of a landslide is down slope gravitational stress applied to slope materials (overly steep natural slopes, cliffs, man-made cuts and fills, etc.). Another common cause includes excessive rainfall or irrigation on a cliff or slope. A type of soil failure is slope wash, from the erosion of slopes by surface-water runoff. Earthquakes can trigger rockfalls, rock avalanches, debris flows, or other types of potentially damaging landslide movements.

The project site is not within a "Landslide Susceptibility Area" as identified in the County Guidelines for Determining Significance for Geologic Hazards. Landslide Susceptibility Areas were developed based on landslide risk profiles included in the *Multi-Jurisdictional Hazard Mitigation Plan, San Diego, CA* (URS, 2004). Landslide risk areas from this plan were based on data including steep slopes (greater than 25%); soil series data (SANDAG based on USGS 1970s series); soil-slip susceptibility from USGS; and Landslide Hazard Zone Maps (limited to western portion of the County) developed by the California Department of Conservation, Division of Mines and Geology (DMG). Also included within Landslide Susceptibility Areas are gabbroic soils on slopes steeper than 15% in grade because these soils are slide prone. A Geotechnical Investigation Report was prepared for the project, which evaluated the slope stability on the project site. Based on the report, the existing cut and fill slopes have a factor of safety of greater than 1.5 for static conditions. In order for the long-term performance of structures and slopes,

maintenance of improvements is essential. The report recommended that slope planting should consist of ground cover, shrubs and trees that possess deep, dense root structures and require a minimum of irrigation. Design fine-grade elevations should be maintained through the life of any future structure or if design fine grade elevations are altered, adequate area drains should be installed in order to provide rapid discharge of water, away from structures and slopes. Furthermore, since the project is not located within an identified Landslide Susceptibility Area and the geologic environment has a low probability to become unstable, the project would have a less than significant impact from the exposure of people or structures to potential adverse effects from landslides.

b) Result in substantial soil erosion or the loss of topsoil?

- |   |  |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact                     | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact                               |

Discussion/Explanation:

**Less Than Significant Impact:** According to the Soil Survey of San Diego County, the soils on-site identified the sites underlying soil to consist of Type D soils (Friant rocky fine sandy loam and a little Placentia sandy loam). Type D soils are characterized by ‘a very slow infiltration rate (high runoff potential) when thoroughly wet. These consist chiefly of clays that have a high shrink-swell potential, soils that have a high-water table, soils that have a claypan or clay layer at or near the surface, and soils that are shallow over nearly impervious material. These soils have a very slow rate of water transmission. The project proposes permanent drainage facilities which will match or minimize the erosion potential compared to existing conditions at the site. Neither erosion or sedimentation are anticipated due to the mitigating effects provided by the proposed grading improvements and drainage facilities. Also, the project will implement construction phase BMPS per the project specific Storm Water Pollution Prevention Plan (SWPPP) to address pollutants during construction. Based on the Geological Investigative Report, subject pads are suitable for their intended use.

Furthermore, the project will not result in substantial soil erosion or the loss of topsoil for the following reasons:

- The project will not result in unprotected erodible soils; will not alter existing drainage patterns; is not located in a floodplain, wetland, or significant drainage feature; and will not develop steep slopes.
- The project involves grading. However, the project is required to comply with the San Diego County Code of Regulations, Title 8, Zoning and Land Use Regulations, Division 7, Sections 87.414 (DRAINAGE – EROSION PREVENTION) and 87.417 (PLANTING). Compliance with these regulations minimizes the potential for water and wind erosion.

Due to these factors, it has been found that the project will not result in substantial soil erosion or the loss of topsoil on a project level.

In addition, the project will not contribute to a cumulatively considerable impact because all the of past, present and future projects included on the list of projects that involve grading or land disturbance are required to follow the requirements of the San Diego County Code of Regulations, Title 8, Zoning and Land Use Regulations, Division 7, Sections 87.414 (DRAINAGE – EROSION PREVENTION) and 87.417 (PLANTING); Order 2001-01 (NPDES No. CAS 0108758), adopted by the San Diego Region RWQCB on February 21, 2001; County Watershed Protection, Storm Water Management, and Discharge Control Ordinance (WPO) (Ord. No. 9424); and County Storm water Standards Manual adopted on February 20, 2002, and amended January 10, 2003 (Ordinance No. 9426). Refer to XXI. Mandatory Findings of Significance for a comprehensive list of the projects considered.

- 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 an on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

- |   |  |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact                     | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact                               |

Discussion/Explanation:

**Less Than Significant Impact:** The proposed project is a grading plan to rectify a code enforcement violation on a residential use lot. The proposed project involves 3,500 cubic yards of grading that would result in the creation of areas of cut and areas underlain by fill. No structures would be constructed. A Geotechnical Investigation Report was prepared for the project, which evaluated the slope stability on the project site. The slopes are considered to be grossly and surficially stable in their current condition. Impacts would be less than significant. For further information regarding landslides, liquefaction, and lateral spreading, refer to VII. Geology and Soils, Question a., iii-iv listed above.

- d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

- |   |  |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact                     | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact                               |

Discussion/Explanation:

**Less Than Significant Impact:** The project is a grading permit to rectify a grading violation on a residential lot. The project is located on expansive soils as defined within Table 18-I-B of the Uniform Building Code (1994). Based on the Geotechnical Investigation Report, direct observation and testing were not conducted during grading operations for the subject pads; however, data developed during subsurface exploration and field density testing indicates the fill

soils were placed and compacted in general conformance with recommendations in the Geotechnical Investigation Report and do not need to be removed and recompacted. In addition, the slopes are considered to be grossly and superficially stable in their current condition. Furthermore, the project is required to comply the improvement requirements identified in the 1997 Uniform Building Code, Division III – Design Standard for Design of Slab-On-Ground Foundations to Resist the Effects of Expansive Soils and Compressible Soils, which ensure suitable structure safety in areas with expansive soils. Therefore, these soils will not create substantial 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?

- |   |   |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact                     | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact         |

Discussion/Explanation:

**No Impact:** The project is for grading permit to rectify a grading violation on a residential lot. The project does not propose any septic tanks or alternative wastewater disposal systems since no wastewater will be generated. In addition, the project site is currently developed with existing single dwelling unit that will remain and is currently connected to an existing on-site septic system.

f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

- |   |   |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact                     | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact         |

San Diego County has a variety of geologic environments and geologic processes which generally occur in other parts of the state, country, and the world. However, some features stand out as being unique in one way or another within the boundaries of the County.

**No Impact:** A review of the County’s Paleontological Resources Maps indicates that the project is located entirely on plutonic igneous rock and has no potential for producing fossil remains. The site does not contain any unique geologic features that have been listed in the County’s Guidelines for Determining Significance for Unique Geology Resources nor does the site support any known geologic characteristics that have the potential to support unique geologic features.



**VIII GREENHOUSE GAS EMISSIONS – Would the project**

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

- |   |  |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact                     | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact                               |

Discussion/Explanation:

**Less Than Significant Impact:**

State CEQA Guidelines Section 15064.4 states that “the determination of the significance of greenhouse gas emissions (GHG) calls for careful judgment by the lead agency, consistent with the provisions in Section 15064. A lead agency should make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate, or estimate the amount of greenhouse gas emissions resulting from a project.” Section 15064.4(b) further states that a lead agency should consider the following non-exclusive factors when assessing the significance of GHG emissions:

1. The extent to which the project may increase or reduce GHG emissions as compared to the existing environmental setting;
2. Whether the project emissions exceed a threshold of significance that the lead agency applies to the project; and
3. The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions.

State CEQA Guidelines Section 15064(h)(1) states that “the lead agency shall consider whether the cumulative impact is significant and whether the effects of the project are cumulatively considerable.” A cumulative impact may be significant when the project’s incremental effect, though individually limited, is cumulatively considerable.

The County General Plan incorporates smart growth and land planning principles intended to reduce VMT, and thereby reduce GHG emissions. Specifically, the General Plan directed preparation of a County Climate Action Plan (CAP) with reduction targets; development of regulations to encourage energy efficient building design and construction; and development of regulations that encourage energy recovery and renewable energy facilities, among other actions. These planning and regulatory efforts are intended to ensure that actions of the County do not impede AB 32 and Senate Bill (SB) 375 mandates.

As such, on February 14, 2018, the County Board of Supervisors (Board) adopted a CAP that identifies specific strategies and measures to reduce GHG emissions in the largely rural,

unincorporated areas of San Diego County as well as County government operations (County of San Diego 2018). The CAP aims to meet the state's 2020 and 2030 GHG reduction targets (AB 32 and SB 375, respectively), and demonstrate progress towards the 2050 GHG reduction goal.

On September 30, 2020, the Board voted to set aside its approval of the County's 2018 CAP and related actions because the Final Supplemental Environmental Impact Report (2018 CAP SEIR) was found to be out of compliance with CEQA. In response to this Board action, the County is preparing a CAP Update to revise the 2018 CAP and correct the items identified by the 4th District Court of Appeal in San Diego within the Final 2018 CAP SEIR that were not compliant.

The County does not currently have locally adopted screening criteria or GHG thresholds. Pending adoption of a new CAP, Bay Area Quality Management District (BAAQMD) GHG emissions thresholds were considered for purposes of this analysis. The CEQA Guidelines do not provide numeric or quantitative thresholds of significance for evaluating GHG emissions. Instead, they leave the determination of threshold significance up to the lead agency and provide it the discretion to consider thresholds of significance previously adopted or recommended by other public agencies or experts, provided that the lead agency's decision is supported by substantial evidence (CEQA Guidelines Sections 15064.7[b] and 15064.7[c]). Additionally, any public agency may also use an environmental standard as a threshold of significance, as it would promote consistency in significance determination and integrate environmental review with other environmental program planning and regulations (CEQA Guidelines Section 15064.7[d]).

It should be noted that an individual project's GHG emissions will generally not result in direct impacts under CEQA, as the climate change issue is global in nature, however an individual project could be found to contribute to a potentially significant cumulative impact. CEQA Guidelines Section 15130(f) states that an EIR shall analyze greenhouse gas emissions resulting from a proposed project when the incremental contribution of those emissions may be cumulatively considerable.

For land use development projects, the BAAQMD recommends using the approach endorsed by the California Supreme Court in *Center for Biological Diversity v. Department of Fish & Wildlife* (2015) (62 Cal.4th 204), which evaluates a project based on its effect on California's efforts to meet the state's long-term climate goals. As the Supreme Court held in that case, a project that would be consistent with meeting those goals can be found to have a less than significant impact on climate change under CEQA. If a project would contribute its "fair share" of what would be required to achieve those long-term climate goals, then a reviewing agency can find that the impact would not be significant because the project would help to solve the problem of global climate change (62 Cal.4th 220–223). If a land use project incorporates all of the design elements necessary for it to be carbon neutral by 2045, then it would contribute its portion of what is needed to achieve the state's climate goals and would help to solve the cumulative problem. It can therefore be found to make a less than cumulatively-considerable climate impact. Because this guidance supports how a project would contribute its "fair share" of the statewide long-term GHG reduction goals, it is not specific to the BAAQMD region and can also be applied

in the San Diego region. BAAQMD's Justification Report: CEQA Thresholds for Evaluating the Significance of Climate Impacts from Land Use Projects and Plan (Justification Report), adopted April 2022, is provided in Appendix C. The information provided in the Justification Report is intended to provide the substantial evidence that lead agencies need to support their determinations about significance using these thresholds.

The Justification Report analyzes what would be required of new land use development projects to achieve California's long-term climate goal of carbon neutrality by 2045. A new land use development project being built today needs to incorporate the following design elements to do its "fair share" of implementing the goal of carbon neutrality by 2045:

- A) Projects must include, at a minimum, the following project design elements:
  - 1) Buildings
    - a) The project will not include natural gas appliances or natural gas plumbing (in both residential and nonresidential development).
    - b) The project will not result in any wasteful, inefficient, or unnecessary energy usage as determined by the analysis required under CEQA Section 21100(b)(3) and Section 15126.2(b) of the State CEQA Guidelines.
  - 2) Transportation
    - a) Achieve a reduction in project-generated VMT below the regional average consistent with the current version of the California Climate Change Scoping Plan (currently 15 percent) or meet a locally adopted Senate Bill 743 VMT target, reflecting the recommendations provided in the Governor's Office of Planning and Research's (OPR) Technical Advisory on Evaluating Transportation Impacts in CEQA:
      - (i) Residential projects: 15 percent below the existing VMT per capita
      - (ii) Office projects: 15 percent below the existing VMT per employee
      - (iii) Retail projects: no net increase in existing VMT
    - b) Achieve compliance with off-street electric vehicle requirements in the most recently adopted version of CALGreen Tier 2.

The project would result in no operational energy use or VMT. Therefore, GHG emissions would be limited to emissions from the use of construction equipment during grading. The CalEEMod air quality modeling conducted for the project determined that the project is estimated to generate a total of 60.61 metric tons (MT) of carbon dioxide equivalent (CO<sub>2</sub>e) during grading activities, which represents a minimal amount of GHG emissions comparative to standard construction projects. For example, construction of 50 residences is equated to generate approximately 900 MT CO<sub>2</sub>e. In addition, grading operations associated with the project would be subject to the County of San Diego Grading Ordinance and SDAPCD Rule 55, which requires the implementation of standard BMPs (e.g., watering, control of vehicle speeds) to ensure dust and diesel emissions are minimized during grading activities.

Further, the grading activities associated with the proposed project are consistent with the existing land use designation and zoning of the property. Given the project would be consistent

with the zoning and allowed uses on the property, it can be assumed that limited grading activities were assumed for the property in the General Plan.

Given the project size and the short-term, temporary emissions that would occur from grading operations to remedy the code violation case, the project would not be expected to result in a substantial contribution of GHG emissions to global climate change. Therefore, it is determined that the project would result in less than cumulatively considerable impacts associated with GHG emissions and no mitigation is required.

b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

- |   |  |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact                     | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact                               |

Discussion/Explanation:

**Less Than Significant Impact:** The project is a grading permit for rectifying a grading violation which would not result in the generation of any new vehicle trips or generate additional greenhouse gases in any way, therefore the project would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing emissions of GHG's.

In 2006, the State passed the Global Warming Solutions Act of 2006, commonly referred to as AB 32, which set the greenhouse gas emissions reduction goal for the State of California into law. The law requires that by 2020, State emissions must be reduced to 1990 levels by reducing greenhouse gas emissions from significant sources via regulation, market mechanisms, and other actions.

Senate Bill 375 (SB 375), passed in 2008, links transportation and land use planning with global warming. It requires the California Air Resources Board (ARB) to set regional targets for the purpose of reducing greenhouse gas emissions from passenger vehicles. Under this law, if regions develop integrated land use, housing and transportation plans that meet SB 375 targets, new projects in these regions can be relieved of certain review requirements under CEQA. SANDAG has prepared a Sustainable Communities Strategy (SCS) which is a new element of the 2050 Regional Transportation Plan (RTP). The strategy identifies how regional greenhouse gas reduction targets, as established by the ARB, will be achieved through development patterns, transportation infrastructure investments, and/or transportation measures or policies that are determined to be feasible.

To implement State mandates to address climate change in local land use planning, local land use jurisdictions are generally preparing GHG emission inventories and reduction plans and incorporating climate change policies into local General Plans to ensure development is guided by a land use plan that reduces GHG emissions. The County of San Diego's General Plan incorporates various climate change goals and policies. These policies provide direction for

individual development projects to reduce GHG emissions and help the County meet its GHG emission reduction targets identified in the Climate Action Plan. The County's Climate Action Plan (CAP) includes GHG reduction measures that, if fully implemented, would achieve an emissions reduction target that is consistent with the state-mandated reduction target embodied in AB 32. A set of project-specific implementing thresholds are included in the County's Guidelines for Determining Significance and are used to ensure project consistency with the County's CAP, GHG emission reduction target, and the various General Plan goals and policies related to GHG emissions that support CAP goals. Therefore, the project would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

**IX. HAZARDS AND HAZARDOUS MATERIALS** -- Would the project:

- a) Create a significant hazard to the public or the environment through the routine transport, storage, use, or disposal of hazardous materials or wastes or through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

- |   |  |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact                     | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact                               |

Discussion/Explanation:

**Less Than Significant Impact:** Project grading would involve the transport of gasoline and other petroleum-based products associated with construction equipment. These materials are considered hazardous as they could cause temporary localized soil and water contamination. Incidents of spills or other localized contamination could occur during refueling, operation of machinery, undetected fluid leaks, or mechanical failure. However, all storage, handling, and disposal of these materials are regulated by California Department of Toxic Substances Control, the USEPA, and the North County Fire Protection Department. All construction activities involving the transportation, usage, and disposal of hazardous materials would be subject to all applicable federal, state, and local requirements, which would reduce impacts associated with the use and handling of hazardous materials during construction to less than significant. The project would not involve additional operational components from existing site conditions. Therefore, the project would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, and impacts would be less than significant.

- b) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

- |   |   |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
|---|---|

- Less Than Significant With Mitigation Incorporated       No Impact

Discussion/Explanation:

**No Impact:**

The project is not located within one-quarter mile of an existing or proposed school. The nearest school to the project site is the Bonsall Elementary School, approximately 1.59 miles away. Further, the transport and handling of minor amounts of hazardous materials during construction would comply with all applicable federal, state, and local regulations that control hazardous material handling. Therefore, the project will not have any effect on an existing or proposed school.

- c) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, or is otherwise known to have been subject to a release of hazardous substances and, as a result, would it create a significant hazard to the public or the environment?

- Potentially Significant Impact       Less than Significant Impact  
 Less Than Significant With Mitigation Incorporated       No Impact

Discussion/Explanation:

**No Impact:** Based on regulatory database search, the project site has not been subject to a release of hazardous substances. The project site is not included in any of the following lists or databases: the State of California Hazardous Waste and Substances sites list compiled pursuant to Government Code Section 65962.5., the San Diego County Hazardous Materials Establishment database, the San Diego County DEH Site Assessment and Mitigation (SAM) Case Listing, the Department of Toxic Substances Control (DTSC) Site Mitigation and Brownfields Reuse Program Database ("CalSites" Envirostor Database), the Resource Conservation and Recovery Information System (RCRIS) listing, the EPA's Superfund CERCLIS database or the EPA's National Priorities List (NPL). Additionally, the project does not propose structures for human occupancy or significant linear excavation within 1,000 feet of an open, abandoned, or closed landfill, is not located on or within 250 feet of the boundary of a parcel identified as containing burn ash (from the historic burning of trash), is not on or within 1,000 feet of a Formerly Used Defense Site (FUDS), does not contain a leaking Underground Storage Tank, and is not located on a site with the potential for contamination from historic uses such as intensive agriculture, industrial uses, a gas station or vehicle repair shop. Therefore, the project would not create a significant hazard to the public or environment.

- d) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

- |   |   |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact                     | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact         |

Discussion/Explanation:

**No Impact:** The proposed project is not located within an Airport Land Use Compatibility Plan (ALUCP), an Airport Influence Area, or a Federal Aviation Administration Height Notification Surface. Also, the project does not propose construction of any structure equal to or greater than 150 feet in height, constituting a safety hazard to aircraft and/or operations from an airport or heliport. Therefore, the project will not constitute a safety hazard for people residing or working in the project area.

- e) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

- |   |  |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact                     | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact                               |

Discussion/Explanation:

The following sections summarize the project's consistency with applicable emergency response plans or emergency evacuation plans.

- i. OPERATIONAL AREA EMERGENCY PLAN AND MULTI-JURISDICTIONAL HAZARD MITIGATION PLAN:

**Less Than Significant Impact:** The Operational Area Emergency Plan is a comprehensive emergency plan that defines responsibilities, establishes an emergency organization, defines lines of communications, and is designed to be part of the statewide Standardized Emergency Management System. The Operational Area Emergency Plan provides guidance for emergency planning and requires subsequent plans to be established by each jurisdiction that has responsibilities in a disaster situation. The Multi-Jurisdictional Hazard Mitigation Plan includes an overview of the risk assessment process, identifies hazards present in the jurisdiction, hazard profiles, and vulnerability assessments. The plan also identifies goals, objectives and actions for each jurisdiction in the County of San Diego, including all cities and the County unincorporated areas. The project will not interfere with this plan because it will not prohibit subsequent plans from being established or prevent the goals and objectives of existing plans from being carried out.

- ii. SAN DIEGO COUNTY NUCLEAR POWER STATION EMERGENCY RESPONSE PLAN

**No Impact:** The San Diego County Nuclear Power Station Emergency Response Plan will not be interfered with by the project due to the location of the project, plant and the specific requirements of the plan. The emergency plan for the San Onofre Nuclear Generating Station includes an emergency planning zone within a 10-mile radius. All land area within 10 miles of the plant is not within the jurisdiction of the unincorporated County and as such a project in the unincorporated area is not expected to interfere with any response or evacuation. Therefore, no impact would occur.

iii. OIL SPILL CONTINGENCY ELEMENT

**No Impact:** The Oil Spill Contingency Element will not be interfered with because the project is not located along the coastal zone or coastline.

iv. EMERGENCY WATER CONTINGENCIES ANNEX AND ENERGY SHORTAGE RESPONSE PLAN

**No Impact:** The Emergency Water Contingencies Annex and Energy Shortage Response Plan will not be interfered with because the project does not propose altering major water or energy supply infrastructure, such as the California Aqueduct. Therefore, no impact would occur.

v. DAM EVACUATION PLAN

**No Impact:** The Dam Evacuation Plan would not be interfered with because no grading is proposed on the portion of the project site that is located within a dam inundation zone.

f) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

- |   |  |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact                     | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact                               |

Discussion/Explanation:

**Less Than Significant Impact:** The proposed project is a major grading to rectify a grading violation on a residential developed lot. The Project is located within a County identified Wildland Urban Interface (WUI) zone. A WUI is defined as an area where development is in proximity to open space or lands with native vegetation and habitat that are prone to brush fires. Most of the unincorporated County is within the WUI. CAL FIRE has mapped areas of significant fire hazards throughout the state and classifies lands different Fire Hazard Severity Zones (FHSZ) based upon fuels, terrain, weather, and other relevant factors. The FHSZ are divided into three levels of fire hazard severity: Moderate, High and Very High. The majority of the County is in the High and Very High FHSZ. Although the project site is located with the WUI, the project will not expose people or structures to a significant risk of loss, injury or death involving wildland fires because the project will comply with the regulations relating to emergency access, water supply,



and defensible space specified in the Consolidated Fire Code for the 16 Fire Protection Districts in San Diego County. This will also ensure that all activities associated with the proposed grading would comply with all requirements in order to reduce significant risk of loss, injury or death involving wildland fires.

Moreover, the project will not contribute to a cumulatively considerable impact, because all past, present and future projects in the surrounding area are required to comply with the Consolidated Fire Code.

g) Propose a use, or place residents adjacent to an existing or reasonably foreseeable use that would substantially increase current or future resident’s exposure to vectors, including mosquitoes, rats or flies, which are capable of transmitting significant public health diseases or nuisances?

- |   |   |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact                     | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact         |

Discussion/Explanation:

**No Impact:** The project is a grading plan and does not involve or support uses that allow water to stand for a period of 72 hours (3 days) or more (e.g. artificial lakes, agricultural irrigation ponds). Also, the project does not involve or support uses that will produce or collect animal waste, such as equestrian facilities, agricultural operations (chicken coops, dairies etc.), solid waste facility or other similar uses. Moreover, there are none of these uses on adjacent properties. Therefore, the project will not substantially increase current or future resident’s exposure to vectors, including mosquitoes, rats or flies.

**X. HYDROLOGY AND WATER QUALITY** -- Would the project:

a) Violate any *water quality standards* or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

- |   |  |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact                     | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact                               |

Discussion/Explanation:

The following technical studies have been prepared for the project

- Standard SWQMP prepared by Fusion Engineering, Inc., dated March 9, 2022.
- Drainage Study prepared by Fusion Engineering, Inc. dated June 27, 2022.

The following responses have incorporated the analyses from these studies.

**Less Than Significant Impact:** The proposed project is a grading permit to rectify a grading violation which requires NPDES permits for discharges of storm water associated with

construction activities. Minimum required construction BMPs would include vegetation stabilization planting, fiber rolls (straw wattles), stabilized construction entrance, materials management, and waste management.

In addition, a Drainage Study dated June 27, 2022 and Standard SWQMP dated March 9, 2022 have been prepared. The project proposes and would be required to implement the following site design measures and/or source control BMPs and/or permanent post-construction pollutant and hydromodification control BMPs to reduce potential pollutants to the maximum extent practicable from entering stormwater runoff: hydraulic stabilization and hydroseeding on disturbed slopes, County Standard lot perimeter protection detail and County Standard desilting basin for erosion control on disturbed flat areas, energy dissipater outlet protection for water velocity control, silt fencing, fiber rolls, gravel and sand bags, storm drain inlet protection and engineered desilting basin for sediment control, stabilized construction entrance, street sweeping and vacuuming for offsite tracking of sediment, and measures to control materials management and waste management. The project is utilizing self-mitigation drainage management areas by following the 'Self-mitigating' criteria required by the County of San Diego BMP Design Manual (2020).

The project would be consistent with requirements of the County of San Diego BMP Design Manual, which is a design manual for compliance with local County of San Diego Watershed Protection Ordinance (Sections 67.801 et seq.) and regional Municipal Separate Storm Sewer System (MS4) Permit (Regional Water Quality Control Board [RWQCB], San Diego Region Order No. R9-2013-0001 as amended by R9-2015-0001 and R9-2015-0100) requirements for stormwater management.

Further, the project would not increase the area of impervious surfaces onsite and does not propose long-term operational uses that could otherwise degrade surface or groundwater quality. Therefore, the project would have less than significant impacts on water quality standards and discharge requirements, as well as degradation of surface and groundwater quality in general.

Finally, the project's conformance to the waste discharge requirements listed above ensures the project will not create cumulatively considerable water quality impacts related to waste discharge because, through the permit, the project will conform to Countywide watershed standards in the JURMP and SUSMP, derived from State regulation to address human health and water quality concerns. Therefore, the project will not contribute to a cumulatively considerable impact to water quality from waste discharges.

b) Is the project tributary to an already impaired water body, as listed on the Clean Water Act Section 303(d) list? If so, could the project result in an increase in any pollutant for which the water body is already impaired?

- |   |  |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact                     | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact                               |

Discussion/Explanation:

**Less Than Significant Impact:** The project lies in the Bonsall Hydrologic Sub-Area (903.12) of Lower San Luis Rey Hydrologic Area (903.1) of San Luis Rey Hydrologic Unit (903). According to the Clean Water Act Section 303(d) list, this watershed is impaired for:

The Standard SWQMP prepared for the project includes the following design measures and source control BMPs such that potential pollutants would be reduced to the maximum extent practicable so as not to increase the level of pollutants in receiving waters and reduce impacts on stormwater quality and hydromodification to less than significant levels: vegetation stabilization planting, fiber rolls (straw wattles), stabilized construction entrance, materials and waste management, permeable surfaces, and biofiltration basins.

The proposed BMPs are consistent with the regional surface water and stormwater planning and permitting process that has been established to improve the overall water quality in County watersheds. As a result, the project would not contribute to a cumulative impact to an already impaired water body, as listed on the Clean Water Act Section 303(d). Regional surface water and stormwater permitting regulation for County of San Diego includes the following: RWQCB, San Diego Region Order No. R9-2013-0001 as amended by R9-2015-0001 and R9-2015-0100, San Diego Watershed Protection Ordinance (Sections 67.801 et seq.), and the County of San Diego BMP Design Manual. The stated purposes of these ordinances are to protect the health, safety, and general welfare of the County of San Diego residents; to protect water resources and to improve water quality; to ensure the use of management practices by the County and its citizens that will reduce the adverse effects of polluted runoff discharges on waters of the state; to secure benefits from the use of stormwater as a resource; and to ensure the County is compliant with applicable state and federal laws. The Watershed Protection Ordinance has discharge prohibitions and requirements that vary depending on type of land use activity and location in the County. The project would be subject to the Watershed Protection Ordinance, which would require the preparation of a Stormwater Management Plan that details the project's pollutant discharge contribution to a given watershed and proposes BMPs or design measures to mitigate any impacts that may occur in the watershed. Therefore, impacts would be less than significant.

c) Could the proposed project cause or contribute to an exceedance of applicable surface or groundwater receiving water quality objectives or degradation of beneficial uses?

- |   |  |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact                     | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact                               |

Discussion/Explanation:

**Less Than Significant Impact:** The RWQCB has designated water quality objectives for waters of the San Diego Region to protect the existing and potential beneficial uses of each

hydrologic unit. The project lies in the Bonsall Hydrologic Sub-Area (903.12) of Lower San Luis Rey Hydrologic Area (903.1) of San Luis Rey Hydrologic Unit (903) that has the following existing and potential beneficial uses for groundwater: municipal and domestic supply; agricultural supply; industrial process supply, and industrial service supply.

Potential sources of polluted runoff resulting from the project are discussed in the Standard SWQMP prepared for the project. The following site design measures and/or source control BMPs and/or permanent post construction pollutant and hydromodification control BMPs would be employed to reduce potential pollutants in runoff to the maximum extent practicable: use of native, non-invasive drought tolerant species not requiring fertilizers and pesticides and disturbed soils that will be amended and aerated to promote water retention equivalent to undisturbed native topsoil. Therefore, the project would not cause or contribute to an exceedance of applicable surface or groundwater receiving water quality objectives or degradation of beneficial uses.

In addition, the proposed BMPs are consistent with regional surface water, stormwater and groundwater planning and permitting process that has been established to improve the overall water quality in County watersheds. As a result, the project would not contribute to an exceedance of applicable surface or groundwater receiving water quality objectives or degradation of beneficial uses. Refer to response X. Hydrology and Water Quality, b), for more information on regional surface water and stormwater planning and permitting process.

d) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

- |   |  |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact                     | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact                               |

Discussion/Explanation:

**Less than Significant Impact:** The project site obtains its water supply from the Rainbow Public Water Utility District. The project would not require additional restroom facilities or associated use of additional potable water due to the project remedying a code violation case with no proposed structures. Limited water will be required during the construction phase and obtained from the Rainbow Municipal Water Utility District. No groundwater would be used for any purposes during construction or operation phases of the project. In addition, no new impervious surfaces are proposed that would interfere with groundwater recharge. The project would not involve regional diversion of water to another groundwater basin, or diversion or channelization of a stream course or waterway with impervious layers, such as concrete lining or culverts, for substantial distances (e.g., 0.25-mile). Therefore, impacts would be less than significant.

- e) 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 surface, in a manner which would:
  - (i) result in substantial erosion or siltration on- or off-site;

- |   |  |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact                     | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact                               |

Discussion/Explanation:

**Less than Significant Impact:** As outlined in the Standard SWQMP prepared for the project, the project would implement the following site design measures, source control, and/or permanent post construction pollutant and hydromodification control BMPs to reduce potential pollutants, including sediment from erosion or siltation, from entering stormwater runoff to the maximum extent practicable: permeable surfaces and biofiltration basins. Runoff would be directed to the biofiltration basins at the northern end of the facility and along the access driveway. These measures would control erosion and sedimentation and satisfy waste discharge requirements as required by the Land-Use Planning for New Development and Redevelopment Component of the San Diego MS4 Permit (SDRWQCB Order No. R9-2013-0001), as implemented by the San Diego County Jurisdictional Runoff Management Program and BMP Design Manual. The Standard SWQMP specifies and describes the implementation process of all BMPs that would address equipment operation and materials management, prevent the erosion process from occurring, and prevent sedimentation. The Department of Public Works would ensure that the Standard SWQMP is implemented as proposed. Due to these factors, the project would not result in significantly increased erosion or sedimentation potential and impacts would be less than significant. For further information on soil erosion, refer to response VII. Geology and Soils, b).

- (ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;

- |   |  |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact                     | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact                               |

**Less than Significant Impact:** The proposed project is a grading permit to rectify a grading violation. The Drainage Study prepared for the project analyzes drainage before and after proposed development of the project site, including BMPs required to control runoff rate and quality to ensure that no adverse effects would occur to downgradient neighboring properties, consistent with the County's Hydrology Manual, Hydraulic Design Manual, and BMP Design Manual. The Drainage Study determined that the proposed grading would:

- not increase runoff at peak runoff flows, onsite and offsite; The project site-maintained drainage patterns are at or below pre-developed flow volume and velocity; and
- the site's overall runoff factor in the post developed condition is unchanged and remains at 0.359.

Furthermore, based on the Drainage Study, the project site was determined to be within an area on the FEMA Flood Insurance Rate Map designated as Zone X, an area of minimal flood hazard. Since the project site is not currently prone to flooding and future site grading would not substantially alter the drainage patterns, the project site would not be prone to onsite flooding under design peak flow conditions. Therefore, the project would not substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite. Impacts would be less than significant.

(iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or

- |   |  |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact                     | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact                               |

**Less than Significant Impact:** As discussed above in response X. Hydrology and Water Quality, e(ii), the project would not result in increased peak runoff flows. The discharges to the downstream in the proposed conditions will be equal or less than discharges in the existing conditions. Therefore, the project would not create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. Impacts would be less than significant.

(iv) impede or redirect flood flows?

- |   |  |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact                     | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact                               |

**Less than Significant Impact:** As discussed above in response X. Hydrology and Water Quality, e(ii), runoff would maintain flow at or below pre-development values. Flows would be controlled at the points where existing runoff leaves the property. Therefore, the project would not impede or redirect flows. Impacts would be less than significant.

f) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

- |   |  |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact                     | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact                               |

**Less Than Significant Impact:** The Federal Emergency Management Agency (FEMA) website was referenced to determine the site’s location relative to any mapped flood hazard areas. The project site was determined to be within an area on the FEMA Flood Insurance Rate Map designated as Zone X, an area of minimal flood hazard. In addition, the project would remedy a code violation case and no permanent or habitable structures are proposed. The project site is also not located within County Floodplain, or County Floodway flood zones, or located within a tsunami or seiche inundation zone. Therefore, impacts would be less than significant.

g) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

- Potentially Significant Impact
- Less Than Significant With Mitigation Incorporated
- Less than Significant Impact
- No Impact

**Less than Significant Impact:** The project site would be in compliance with the San Diego Basin Water Quality Control Plan and is not located within a County Sustainable Groundwater Management Act or Groundwater Sustainability Plan basin area. See responses X. Hydrology and Water Quality, a) through d). Therefore, the project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Impacts would be less than significant.

**XI. LAND USE AND PLANNING** -- Would the project:

a) Physically divide an established community?

- Potentially Significant Impact
- Less Than Significant With Mitigation Incorporated
- Less than Significant Impact
- No Impact

Discussion/Explanation:

**No Impact:** The project does not propose the introduction of new infrastructure such major roadways or water supply systems, or utilities to the area. The proposed project is a minor grading permit to rectify a grading violation on a lot that is developed with residential use. In addition, the project would not divide existing public spaces in the vicinity of the site or extend beyond the project site’s boundaries. No streets or sidewalks would be permanently closed as a result of the development. The project would utilize existing roadways and there would be no change in roadway patterns. No separation of uses or disruption of access between land use types would occur as a result of the project. Therefore, the project will not significantly disrupt or divide the established community. Instead, the future development of the project site will further establish rather than divide the 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?

- Potentially Significant Impact
- Less than Significant Impact
- Less Than Significant With Mitigation Incorporated
- No Impact

Discussion/Explanation:

**Less Than Significant Impact:** The project is consistent with the Bonsall Community Plan, which prioritizes its rural character, comprising of primarily low-density residential uses, agricultural uses, and equestrian uses. The project would remedy a grading code violation case by ensuring grading complies with all applicable regulations and ordinances. The applicant does not propose any new structures or new use types. The project does not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, impacts would be less than significant.

**XII. MINERAL RESOURCES** -- Would the project:

a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

- Potentially Significant Impact
- Less than Significant Impact
- Less Than Significant With Mitigation Incorporated
- No Impact

Discussion/Explanation:

**Less Than Significant Impact:**

The project site has been classified by the California Department of Conservation – Division of Mines and Geology (Update of Mineral Land Classification: Aggregate Materials in the Western San Diego Production-Consumption Region, 1997) as an area of “Potential Mineral Resource Significance” (MRZ-3). However, the project site is surrounded by densely developed land uses including single family dwelling units and agricultural uses which are incompatible to future extraction of mineral resources on the project site. A future mining operation at the project site would likely create a significant impact to neighboring properties for issues such as noise, air quality, traffic, and possibly other impacts. Therefore, implementation of the project will not result in the loss of availability of a known mineral resource that would be of value since the mineral resource has already been lost due to incompatible land uses.

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?

- Potentially Significant Impact
- Less than Significant Impact
- Less Than Significant With Mitigation Incorporated
- No Impact

Discussion/Explanation:



**No Impact:**

Based on the County’s GIS system, its indicated that the project site is not located in an area that has MRZ-2 designated lands or is located within 1,300 feet of such lands. The proposed project will not result in the loss of locally important mineral resources because the project site is currently surrounded by developed land uses including residential uses and agricultural uses which are incompatible to future extraction of mineral resources on the project site. The placement of the proposed use on the project site would not result in a loss of mineral resources because the feasibility of future mining at the site is already impacted by existing land use incompatibilities. Based on current land use conditions, a future mining operation at the project site would likely create a significant impact to neighboring properties for issues such as noise, air quality, traffic, and other impacts, thereby reducing the feasibility of future mining operations occurring, regardless of the proposed project.

Therefore, no potentially significant loss of availability of a known mineral resource of locally important mineral resource recovery (extraction) site delineated on a local general plan, specific plan or other land use plan will occur as a result of this project.

**XIII. NOISE** -- Would the project result in:

a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

- |   |  |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact                     | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact                               |

Discussion/Explanation:

**Less Than Significant Impact:**

The project is grading plan to rectify a grading violation on a residential lot. An existing on site residential unit will remain. . The surrounding area supports residential uses and is occupied by residents. The project will not expose people to potentially significant noise levels that exceed the allowable limits of the County of San Diego General Plan, County of San Diego Noise Ordinance, and other applicable standards for the following reasons:

General Plan – Noise Element

The County of San Diego General Plan, Noise Element, Tables N-1 and N-2 addresses noise sensitive areas and requires an acoustical study to be prepared for any use that may expose noise sensitive areas to noise in excess of a Community Noise Equivalent Level (CNEL) of 60 decibels (dBA) for single residences (including senior housing, convalescent homes), and 65 dBA CNEL for multi-family residences (including mixed-use commercial/residential). Moreover, if the project is excess of 60 dBA CNEL or 65 dBA CNEL, modifications must be made to the project to reduce noise levels. Noise sensitive areas include residences, hospitals, schools, libraries or similar facilities as mentioned within Tables N-1 and N-2. Project implementation is

not expected to expose existing or planned noise sensitive areas to road, airport, heliport, railroad, industrial or other noise in excess of the 60 dBA CNEL or 65 dBA CNEL. This is based on staff's review of projected County noise contour maps (CNEL 60 dB(A) contours). Therefore, the project will not expose people to potentially significant noise levels that exceed the allowable limits of the County of San Diego General Plan, Noise Element.

#### Noise Ordinance – Section 36.404

Non-transportation noise generated by the project is not expected to exceed the standards of the County of San Diego Noise Ordinance (Section 36.404) at or beyond the project's property line. The site is zoned Rural Residential that has a one-hour average sound limit of 50 dBA daytime and 45 dBA nighttime threshold. The adjacent properties to the north, east, and west are zoned Rural Residential and the parcels to the south are zone Agriculture, which also have one-hour average sound limit of 50 dBA/ 45 dBA daytime/nighttime, respectively. Based on review by staff, the project's noise levels are not anticipated to impact adjoining properties or exceed County Noise Standards, which is 45 dBA, because the project does not involve any noise producing equipment that would exceed applicable noise levels at the adjoining property line.

#### Noise Ordinance – Section 36.409

The project will not generate construction noise that may exceed the standards of the County of San Diego Noise Ordinance (Section 36.409). Construction operations will occur only during permitted hours of operation pursuant to Section 36.409. Also, it is not anticipated that the project will operate construction equipment in excess of an average sound level of 75dB between the hours of 7 AM and 7 PM.

Finally, the project's conformance to the County of San Diego General Plan Noise Element and County of San Diego Noise Ordinance (Section 36-404 and 36.410) 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 applicable noise level limits at the property line or 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.

Finally, the project's conformance to the County of San Diego General Plan and County of San Diego Noise Ordinance (Section 36-404 and 36.410) 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 applicable noise level limits at the property line or 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.

b) Generation of excessive groundborne vibration or groundborne noise levels?

- |   |  |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact                     | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact                               |

Discussion/Explanation:

**Less Than Significant Impact:**

The project proposes grading to rectify a grading violation on a lot that is developed with a single-family dwelling unit. The project site is located at a setback of 200 feet from any public road or transit Right-of-Way with projected noise contours of 65 dB or more; any property line for parcels zoned industrial or extractive use; or any permitted extractive uses. A setback of 200 feet ensures that the operations do not have any chance of being impacted by groundborne vibration or groundborne noise levels (Harris, Miller Miller and Hanson Inc., *Transit Noise and Vibration Impact Assessment* 1995). In addition, the setback ensures that the project will not be affected by any past, present or future projects that may support sources of groundborne vibration or groundborne noise.

Also, the project does not propose any major, new or expanded infrastructure such as mass transit, highways or major roadways or intensive extractive industry that could generate excessive groundborne vibration or groundborne noise levels and impact vibration sensitive uses in the surrounding area.

Therefore, the project will not expose persons to or generate excessive groundborne vibration or groundborne noise levels on a project or cumulative level.

c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

- |   |   |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact                     | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact         |

Discussion/Explanation:

**No Impact:** The proposed project is not located within an Airport Land Use Compatibility Plan (ALUCP) for airports or within 2 miles of a public airport or public use airport. Therefore, the project will not expose people residing or working in the project area to excessive airport-related noise levels.

**XIV. POPULATION AND HOUSING** -- Would the project:

- a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

- |   |   |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact                     | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact         |

Discussion/Explanation:

**No Impact:** The proposed project is a grading plan to rectify a grading violation on an existing residential lot. The proposed project will not induce substantial population growth in an area because the project does not propose any physical or regulatory change that would remove a restriction to or encourage population growth in an area including, but limited to the following: new or extended infrastructure or public facilities; new commercial or industrial facilities; large-scale residential development; accelerated conversion of homes to commercial or multi-family use; or regulatory changes including General Plan amendments, specific plan amendments, zone reclassifications, sewer or water annexations; or LAFCO annexation actions. No impact will occur.

- b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

- |   |  |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact                     | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact                               |

Discussion/Explanation:

**Less Than Significant Impact:** The project is a minor grading permit to rectify a grading violation. The property currently has a single-family dwelling unit, which will remain. No housing will be demolished as a result of this grading activity. Therefore, the proposed grading plan would not displace any amount of existing housing. Impacts would be less than significant.

**XV. PUBLIC SERVICES**

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

- i. Fire protection?

- ii. Police protection?
- iii. Schools?
- iv. Parks?
- v. Other public facilities?

- |   |   |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact                     | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact         |

Discussion/Explanation:

**No Impact:** The proposed project will not result in the need for significantly altered services or facilities. The project does not involve the construction of new or physically altered governmental facilities including but not limited to fire protection facilities, sheriff facilities, schools, or parks in order to maintain acceptable service ratios, response times or other performance service ratios or objectives for any public services. The project is a minor grading permit to rectify a grading violation on a residential development lot. The project would not generate additional residents and no new buildings are being constructed. Therefore, the project will not have an adverse physical effect on the environment because the project does not require new or significantly altered services or facilities to be constructed.

**XVI. RECREATION**

- a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

- |   |   |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact                     | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact         |

Discussion/Explanation:

**No Impact:** The project does not propose any residential use, included but not limited to a residential subdivision, mobilehome park, or construction for a single-family residence that may increase the use of existing neighborhood and regional parks or other recreational facilities in the vicinity. The project is a minor grading permit to rectify a grading violation on a residential development lot.

With regard to regional recreational facilities, there are over 21,765 acres of regional parkland owned by the County, which exceeds the General Plan standard of 15 acres per 1,000 population. In addition, there are over one million acres of publicly owned land in San Diego County dedicated to parks or open space including Federal lands, State Parks, special districts, and regional river parks. Due to the extensive acreage of existing publicly owned lands that can be used for recreation, the project will not result in substantial physical deterioration of regional recreational facilities or accelerate the deterioration of regional parkland. Moreover, the project will

not result in a cumulatively considerable deterioration or accelerated deterioration of regional recreation facilities because even with all past, present and future residential projects a significant amount of regional recreational facilities will be available to County residents.

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?

- |   |   |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact                     | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact         |

Discussion/Explanation:

**No Impact:** The project does not include recreational facilities or require the construction or expansion of recreational facilities. The project is a minor grading permit to rectify a grading violation on a residential development lot. r. Therefore, the construction or expansion of recreational facilities cannot have an adverse physical effect on the environment.

**XVII. TRANSPORTATION** -- Would the project:

a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

- |   |  |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact                     | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact                               |

Discussion/Explanation: The County of San Diego Guidelines for Determining Significance for Traffic and Transportation (Guidelines) establish measures of effectiveness for the performance of the circulation system. These Guidelines incorporate standards from the County of San Diego Public Road Standards and Mobility Element, the County of San Diego Transportation Impact Fee Program and the Congestion Management Program.

**Less than Significant With Mitigation:** The project is a minor grading permit to rectify a grading violation on a residential development lot. The proposed project will result in an 28 trips from construction activities. No additional operational trips would be generated. However, the project will not have a direct impact related to a conflict with any performance measures establishing measures of effectiveness of the circulation system because the project trips do not exceed any of the County's Guidelines for Determining Significance for direct impacts related to Traffic and Transportation. The project will not result in any additional vehicle trips and will not alter the surrounding circulation system in any way; therefore the project would not conflict with any applicable plan, ordinance or policy establishing measures of the effectiveness of the circulation system. As identified in the County's Guidelines for Determining Significance for Traffic and Transportation, the project trips would not result in a substantial increase in the number of vehicle trips, volume of capacity ratio on roads, or congestion at intersections in relation to existing conditions. In addition, the project would not conflict with policies related to non-motorized travel

such as mass transit, pedestrian or bicycle facilities. Therefore, the project would not have a direct impact related to a conflict with policies establishing measures of the effectiveness for the performance of the circulation system.

b) Would the project conflict or be consistent with CEQA Guidelines section 15064.3, subdivision (b)?

- |   |  |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact                     | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact                               |

Discussion/Explanation:

**Less Than Significant Impact:** As discussed above, traffic associated with project would only be during the grading phase. CEQA Section 15064.3, Determining the Significance of Transportation Impacts, states that for many projects, a qualitative analysis of construction traffic may be appropriate. Since construction traffic is temporary and workers are either travelling to the project jobsite or another jobsite elsewhere, the impact on VMT is considered less than significant. In addition, the project ADT during grading activities would consist of 8 to 44 ADT. The Technical Advisory of the Office of Planning and Research (OPR) recommends that projects that generate less than 110 ADT be considered small projects that have a less than significant impact for Transportation under CEQA. Therefore, the project would not conflict with, and is consistent with, CEQA Guidelines section 15064.3, subdivision (b). Impacts would be less than significant.

c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

- |   |   |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact                     | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact         |

Discussion/Explanation:

**No Impact:** The proposed project will not alter traffic patterns, roadway design, place incompatible uses (e.g., farm equipment) on existing roadways, or create or place curves, slopes or walls which impedes adequate site distance on a road. The project is a grading plan to rectify a grading violation. The project site is currently developed with existing single family dwelling unit.

d) Result in inadequate emergency access?

- |   |   |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact                     | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact         |

Discussion/Explanation:

**No Impact:** The proposed project will not result in inadequate emergency access. The project is not served by a dead-end road that exceeds the maximum cumulative length permitted by the San Diego County Consolidated Fire Code, therefore, the project has adequate emergency access. Additionally, roads used to access the proposed project site are up to County standards.

**XVIII. TRIBAL CULTURAL RESOURCES** -- Would the project:

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

i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of Historical Resources as defined in Public Resources Code §5020.1(k), or

- |   |   |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact                     | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact                    |

ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code §5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code §5024.1, the Lead Agency shall consider the significance of the resource to a California Native American tribe.

- |   |   |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact                     | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact         |

Discussion/Explanation:

**No Impact:**

Pursuant to AB-52, consultation was initiated with culturally affiliated tribes. No tribal cultural resources were identified during consultation. As such, there are no impacts to tribal cultural resources.

**XIX. UTILITIES AND SERVICE SYSTEMS** -- Would the project:

a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications



facilities, the construction or relocation of which could cause significant environmental effects?

- |   |   |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact                     | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact         |

Discussion/Explanation:

**No Impact:** The project is a minor grading permit to rectify a grading violation on a residential development lot. The project site consists of an existing single family dwelling unit that will remain. The proposed project will not exceed the capacity of existing utilities and service systems or result in the construction of new facilities that could cause significant environmental effects. Furthermore, the proposed project will be in compliance with any statutes or regulations relative to solid waste and will not employ equipment that would introduce interference with any communication system. The project does not include new or expanded water or wastewater treatment facilities. Therefore, the project will not require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects. No impact would occur.

b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

- |   |  |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact                     | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact                               |

Discussion/Explanation:

**Less Than Significant Impact:** The project is a minor grading permit to rectify a grading violation on a residential development lot. The project site obtains its water supply from the Rainbow Public Water Utility District. The project would not require potable water due to the project remedying a code violation case with no proposed structures. Limited water will be required during the construction phase and obtained from the Rainbow Municipal Water Utility District. Therefore, the project will have sufficient water supplies available to serve the project.

c) Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

- |   |   |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact                     | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact         |

Discussion/Explanation:

**No Impact:** The project is for grading permit to rectify a grading violation on a residential lot. The project site is currently developed with an existing single dwelling unit that is currently connected to an existing on-site septic system. No changes are proposed for the existing residential unit. No impact would occur.

- d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

- |                          |  |                                     |                              |
|--------------------------|--|-------------------------------------|------------------------------|
| <input type="checkbox"/> | Potentially Significant Impact                     | <input checked="" type="checkbox"/> | Less than Significant Impact |
| <input type="checkbox"/> | Less Than Significant With Mitigation Incorporated | <input type="checkbox"/>            | No Impact                    |

Discussion/Explanation:

**Less Than Significant Impact:** The project is for grading permit to rectify a grading violation on a residential lot. Implementation of the project will generate solid waste during construction. All solid waste facilities, including landfills require solid waste facility permits to operate. In San Diego County, the County Department of Environmental Health, Local Enforcement Agency issues solid waste facility permits with concurrence from the California Integrated Waste Management Board (CIWMB) under the authority of the Public Resources Code (Sections 44001-44018) and California Code of Regulations Title 27, Division 2, Subdivision 1, Chapter 4 (Section 21440et seq.). There are five, permitted active landfills in San Diego County with remaining capacity. Therefore, there is sufficient existing permitted solid waste capacity to accommodate the project's solid waste disposal needs.

- e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

- |                          |  |                                     |                              |
|--------------------------|--|-------------------------------------|------------------------------|
| <input type="checkbox"/> | Potentially Significant Impact                     | <input checked="" type="checkbox"/> | Less than Significant Impact |
| <input type="checkbox"/> | Less Than Significant With Mitigation Incorporated | <input type="checkbox"/>            | No Impact                    |

Discussion/Explanation:

**Less than Significant Impact:** The project is for grading permit to rectify a grading violation on a residential lot. Implementation of the project will generate solid waste during construction. All solid waste facilities, including landfills require solid waste facility permits to operate. In San Diego County, the County Department of Environmental Health, Local Enforcement Agency issues solid waste facility permits with concurrence from the California Integrated Waste Management Board (CIWMB) under the authority of the Public Resources Code (Sections 44001-44018) and California Code of Regulations Title 27, Division 2, Subdivision 1, Chapter 4 (Section 21440et seq.). The project will deposit all solid waste at a permitted solid waste facility and therefore, will comply with Federal, State, and local statutes and regulations related to solid waste.

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

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?

- |   |  |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact                     | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact                               |

**Less than Significant Impact:** The project would be served by the North County Fire Protection District Station. As described in response IX. Hazards and Hazardous Materials, e), the project would not substantially impair an adopted emergency response plan or evacuation plan. The project would rectify a grading code violation case, and no additional use types or structures are proposed. Therefore, no additional demand beyond current conditions is required for emergency response. Therefore, the project would not substantially impair an adopted emergency response plan or emergency evacuation plan, and impacts would be less than significant.

b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentration from a wildfire or the uncontrolled spread of a wildfire?

- |   |   |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact                     | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact                    |

**Less than Significant Impact:** The parcels are adjacent to wildlands that have the potential to support wildland fires. The majority of the County is in the high and very high FHSZ. Accordingly, the County has implemented fire safety measures depending on specific factors, such as location, vegetation, etc. The project does not propose any vegetation that would be considered flammable, and is required to meet applicable fire measures, such as fire apparatus access and access road requirements. Additionally, the project would rectify a grading code violation case and does not propose any additional uses or structures. Therefore, the project would not expose

project occupants, such as residents, to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire, and impacts would be less than significant.

- c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

- |   |   |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact                     | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact         |

**No Impact:** The project is a minor grading permit to rectify a grading violation on a residential development lot. The project would not result in an installation or maintenance of associated infrastructure. In addition, based on project coordination with County staff, compliance with the County Fire Code and Consolidated Fire Code, and compliance with the North County Fire Protection District's requirements, impacts associated with fire risk would be less than significant.

- d) Expose people or structure to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

- |   |   |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact                     | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact         |

**Less than Significant Impact:** As stated in response X. Hydrology and Water Quality, e(ii), the Hydrology Memorandum analyzed drainage before and after proposed development of the project site, including BMPs required to control runoff rate and water quality to ensure that no adverse effects would occur to downgradient neighboring properties. The project proposes permanent drainage facilities that would be constructed to convey both onsite and offsite runoff through the site and towards the western property boundary. The Geotechnical Investigation found no evidence of ancient landslide deposits encountered onsite. The investigation demonstrated that the site would be suitable for development and in compliance with the Grading Ordinance. Further, because the grading permit is to rectify a grading code violation case including stabilizing the onsite slopes, the project would incorporate geotechnical recommendations to ensure soil and slope stability. The project also does not propose any additional use types or structures. Due to the aforementioned factors, the project site would not 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. Impacts are less than significant.

**XXI. MANDATORY FINDINGS OF SIGNIFICANCE:**

- a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or

animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

- |                                     |  |                          |                              |
|-------------------------------------|--|--------------------------|------------------------------|
| <input type="checkbox"/>            | Potentially Significant Impact                     | <input type="checkbox"/> | Less than Significant Impact |
| <input checked="" type="checkbox"/> | Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> | No Impact                    |

Discussion/Explanation:

**Less than Significant with Mitigation Incorporated:** Per the instructions for evaluating environmental impacts in this Initial Study, the potential 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 response to each question in sections IV and V of this form. In addition to project specific impacts, this evaluation considered the projects potential for significant cumulative effects. As a result of this evaluation, the project was determined to have potential significant effects related to biological resources, cultural resources, and geology and soils. However, mitigation has been included that clearly reduces these effects to a level below significance. This mitigation includes:

- **Biological Resources:** The proposed mitigation consists of the offsite purchase of 18.8 acres (5:1 ratio) of coastal sage scrub mitigation credits and 1.35 acres (3:1 ratio) of riparian habitat mitigation credits within a County approved mitigation bank. The project will also be required to obtain a Habitat Loss Permit (HLP). Implementation of mitigation will reduce impacts to less than significant.

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) Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

- |                          |  |                                     |                              |
|--------------------------|--|-------------------------------------|------------------------------|
| <input type="checkbox"/> | Potentially Significant Impact                     | <input checked="" type="checkbox"/> | Less than Significant Impact |
| <input type="checkbox"/> | Less Than Significant With Mitigation Incorporated | <input type="checkbox"/>            | No Impact                    |

Discussion/Explanation:

**Less than Significant Impact:** The following list of past, present and future projects were considered and evaluated as a part of this Initial Study:

<b>PROJECT NAME</b>	<b>PERMIT/MAP NUMBER</b>
1431 Dentre De Lomas	PDS2022-BC-22-0042
Adams Open Space Vacation	PDS2005-3700-05-0019
Anderson B/A	PDS2005-3710-05-0121
Bonsall Oaks	PDS2021-CC-21-0092; PDS2022-LDGRMJ-30390; PDS2021-LDGRMJ-30347; PDS2021-LDMJIP-50090; PDS2022-LDMJIP-50097; PDS2021-MUP-92-019M3; PDS2022-MUP-92-019M4; PDS2022-MUP-92-019M5; PDS2022-VAC-22-002
Bonsall Oaks Bed & Breakfast and Winery	PDS2021-AD-21-019; PDS2021-ZAP-21-001
Cal-A-Vie	PDS2005-3301-82-072-04; PDS2006-3301-82-072-05; PDS2007-3301-82-072-06
Crocker Certificate of Compliance	PDS2020-CC-20-0020
Faulstick 2nd Dwelling Unit Administration	PDS2010-3000-10-037
Marks C/C	PDS2007-3720-07-0122
Mcgreevey B/C	PDS2006-3710-06-0043
Mora Residence Grading	PDS2022-LDGRMJ-30418
Norouzi Residence	PDS2021-STP-21-024
Robillard	PDS2004-3000-04-065
Spa Havens ABC	PDS2014-ABC-14-007
Spirit Ranch	PDS2014-AD-14-018
The Polo Club	PDS1995-2700-12753; PDS1998-2140-4736-1
Verizon Little Gopher	PDS2016-MUP-16-014; PDS2018-MUP-16-014M1
Vista Villas Development	PDS2008-3710-08-0047; PDS2008-3710-08-0048; PDS2008-3710-08-0049
Wayne Anderson Ad Permit Small Winery	PDS2013-AD-13-026
Werner Residence	PDS2014-LDGRMJ-00026
Wilson, D. Ian	PDS2004-3992-04-367

Per the instructions for evaluating environmental impacts in this Initial Study, the potential for adverse cumulative effects were considered in the response to each question in sections I through XX of this form. In addition to project specific impacts, this evaluation considered the projects potential for incremental effects that are cumulatively considerable. As a result of this evaluation, there is no substantial evidence that there are cumulative effects associated with this project. Therefore, this project has been determined not to meet this Mandatory Finding of Significance.

- c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

- |   |  |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact                     | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact                               |

Discussion/Explanation:

**Less than Significant Impact:** In the evaluation of environmental impacts in this Initial Study, the potential for adverse direct or indirect impacts to human beings were considered in the response to certain questions in sections I. Aesthetics, III. Air Quality, VI. Geology and Soils, IX. Hazards and Hazardous Materials, X Hydrology and Water Quality XIII. Noise, XIV. Population and Housing, and XVII. Transportation and Traffic. As a result of this evaluation, there is no substantial evidence that there are adverse effects on human beings associated with this project. Therefore, this project has been determined not to meet this Mandatory Finding of Significance.

**XXII. REFERENCES USED IN THE COMPLETION OF THE INITIAL STUDY CHECKLIST**

All references to Federal, State and local regulation are available on the Internet. For Federal regulation refer to <http://www4.law.cornell.edu/uscode/>. For State regulation refer to [www.leginfo.ca.gov](http://www.leginfo.ca.gov). For County regulation refer to [www.amlegal.com](http://www.amlegal.com). All other references are available upon request.

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