



*The County of San Diego*

# Planning Commission Hearing Report

<b>Date:</b>	July 22, 2022	<b>Case/File No.:</b>	Escondido Estates; PDS2020-TM-5639; PDS2020-AD-20-007; PDS2020-ER-20-08-007
<b>Place:</b>	County Operations Center 5520 Overland Avenue San Diego, CA 92123	<b>Project:</b>	Tentative Map and Administrative Permit, for a Single-Family Residential Development
<b>Time:</b>	9:00 a.m.	<b>Location:</b>	Southeast of the intersection of Idaho Avenue and San Pasqual Valley Road (SR-78)
<b>Agenda Item:</b>	#6	<b>General Plan:</b>	Village Residential (VR-2)
<b>Appeal Status:</b>	Board of Supervisors	<b>Zoning:</b>	Limited Agricultural (A70)
<b>Applicant/Owner:</b>	Oscar Uranga	<b>Community:</b>	North County Metropolitan Subregional Plan Area
<b>Environmental:</b>	CEQA § 15183 Exemption	<b>APN:</b>	234-231-01-00

## A. OVERVIEW

The purpose of this staff report is to provide the Planning Commission with the information necessary to approve, approve with modifications, or deny the proposed Escondido Estates Tentative Map (Project). Discretionary actions required for the proposed Project include an Administrative Permit (AD) and a Tentative Map (TM).

The Project is a request for a TM consisting of 20 single-family residential lots and includes an AD to allow for lot area averaging to create lots smaller than the minimum lot size, which will consolidate the development footprint in the least environmentally sensitive portions of the site, specifically avoiding woodlands habitat area, consistent with Section 4230 of the Zoning Ordinance and Section 81.401(r) of the Subdivision Ordinance for the design of conservation subdivisions.

This report describes the Planning & Development Services (PDS) recommendation, development proposal, analysis and discussion, and public comments. PDS analyzed the Project for consistency with the General Plan, Zoning Ordinance, Subdivision Ordinance, and other applicable regulations, policies and ordinances and reviewed the Project's potential impacts on the environment in accordance with the California Environmental Quality Act (CEQA). Based on staff's analysis, PDS recommends approval of the AD and TM, with the conditions noted in the attached Form of Decision and Resolution (Attachments B and C).

## B. STAFF RECOMMENDATIONS

Staff recommends that the Planning Commission:

1. Adopt the Environmental Findings included in Attachment A, which includes a finding that the Project is exempt from further environmental review pursuant to Section 15183 of the CEQA Guidelines.
2. Adopt the Form of Decision of Approval for Administrative Permit PDS2020-AD-20-007 (Attachment B).
3. Adopt the Resolution of Approval for Tentative Map PDS2020-TM-5639, which includes those requirements and conditions necessary to ensure that the project is implemented in a manner consistent with State law and County of San Diego (County) Regulations (Attachment C).

**C. PROJECT BACKGROUND**

An application for the proposed Escondido Estates Tentative Map (Project) was submitted on May 14, 2020. The Project originally proposed to subdivide the site into 18 single-family lots through a Tentative Map and Administrative Permit for lot area averaging. During review of the project, the applicant redesigned the Project to accommodate 20 lots. The 20 single-family lots conform to the Village Residential 2 (VR-2) General Plan Land Use Designation.

**D. REGIONAL SETTING AND PROJECT LOCATION**

The Project site is located southeast of the intersection of Idaho Avenue and San Pasqual Valley Road (SR-78), approximately 1,500 feet east of the City of Escondido municipal boundary in the southern-central portion of the North County Metropolitan Subregional Plan area, and approximately 2.25 miles east of Interstate I-15 (Figure 1). The Project is surrounded by vacant land, single-family residential development, a plant nursery, and a church with a school, as described in Table D-1. The site is approximately 10.23 acres in size and is currently vacant.

The General Plan Regional Category for the site is Village, which will not be changed with the proposed development. Please refer to Attachment D– Planning Documentation, for maps of surrounding land uses and zoning designations.

*Table D-1: Surrounding Zoning and Land Uses*

<b>Location</b>	<b>General Plan</b>	<b>Zoning</b>	<b>Adjacent Streets</b>	<b>Description</b>
North	Village Residential (VR-2)	A70	Idaho Avenue	Vacant and plant nursery
East	Village Residential (VR-2)	A70	Private Driveways	Single-Family Residential
South	Village Residential (VR-2)	A70	Landovo Drive	Single-Family Residential
West	Village Residential (VR-2)	A70	San Pasqual Valley Road (SR-78)	Escondido Christian Church and School

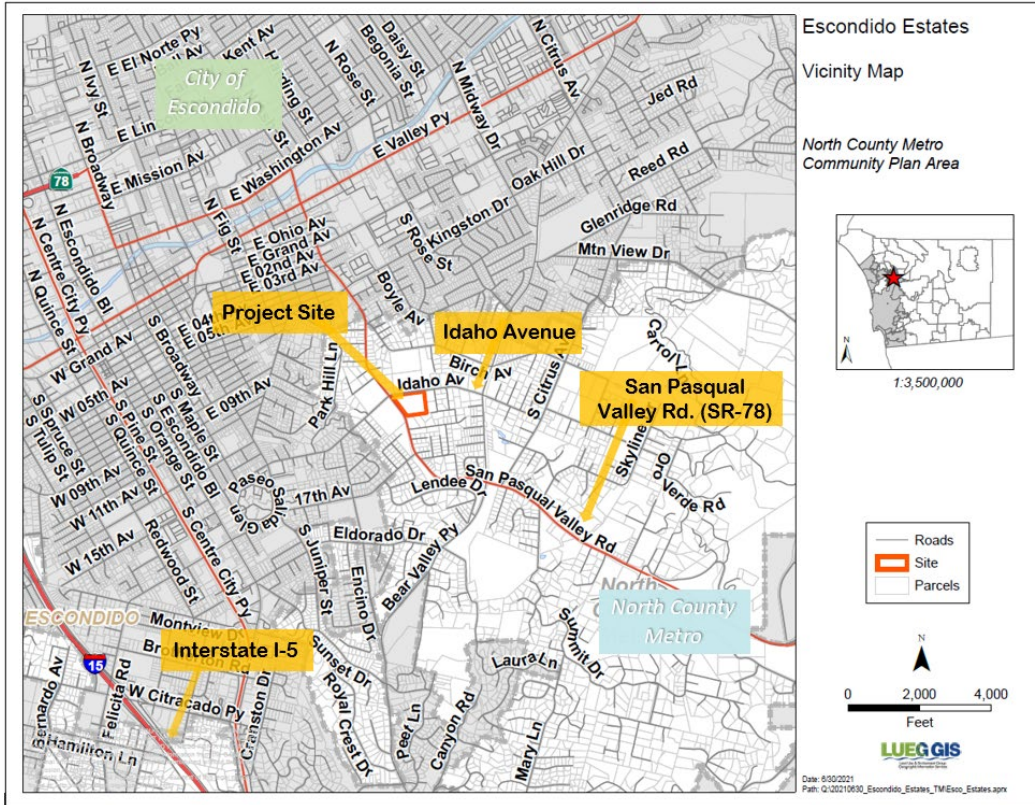


Figure 1: Vicinity Map



Figure 2: Aerial Map

## E. DEVELOPMENT PROPOSAL

### 1. Project Description

The Project is a request for a Tentative Map consisting of 20 single-family residential lots and includes an Administrative Permit to allow for lot area averaging. The development includes 20 single-family residential lots, each with individual driveways connecting to one of two new internal private roads; one stormwater retention basin; individual septic systems for each lot; and approximately 1.43 acres of biological open space to protect existing woodlands within the floodplain defined by the County's Resource Protection Ordinance (RPO). Earthwork will consist of 54,705 cubic yards (CY) of cut and 70,906 CY of fill, resulting in 16,201 CY of import. Project design components are discussed below.

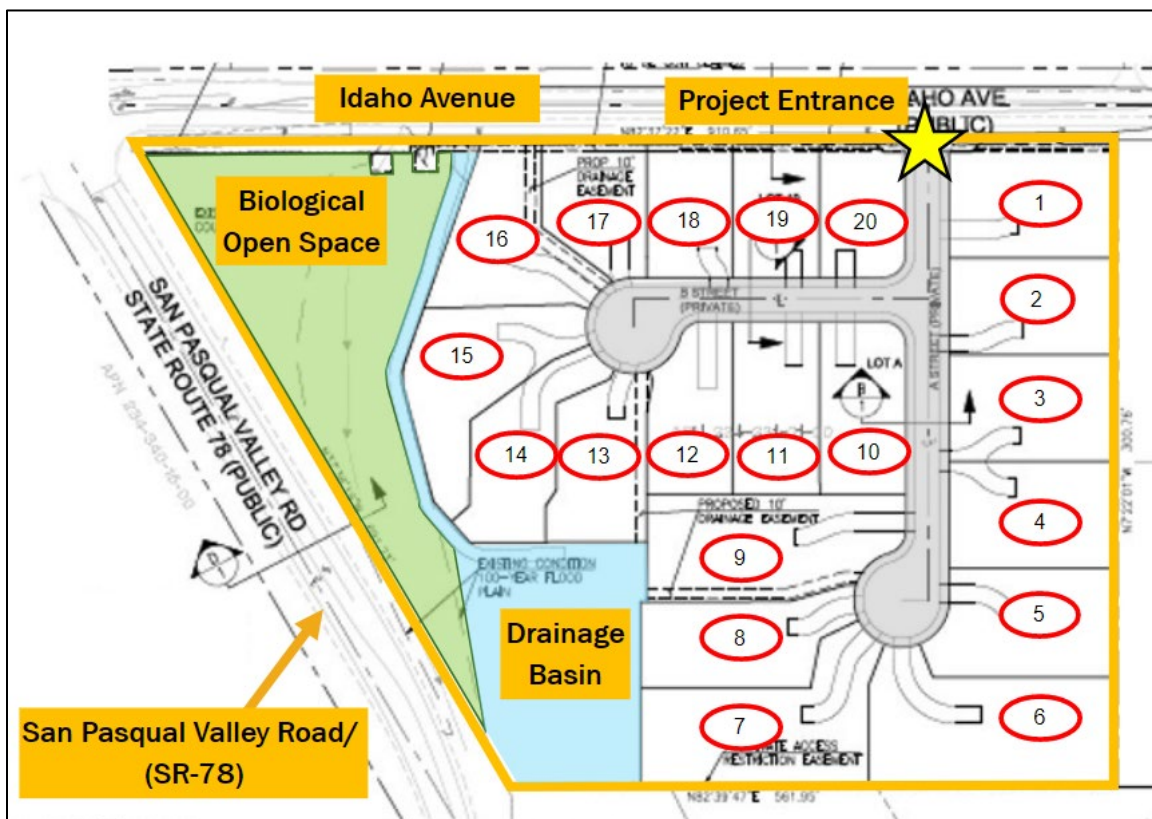


Figure 3: 20-Lot Tentative Map

#### Conservation Subdivision Design / Lot Area Averaging

The purpose of lot area averaging is to allow flexibility in lot size to encourage site design that avoids environmental resources, specifically Woodlands habitat and non-native grasslands, preserves open space areas, and responds to unique site and area features. The intent is that the lots shall relate to the natural features, with larger lots or open space to be located in environmentally constrained areas. The project has been designed as a conservation subdivision consistent with Section 4230 of the County Zoning Ordinance and 81.401(r) of the Subdivision Ordinance. The intent of the Conservation Subdivision Program is to encourage residential subdivision design that improves the preservation of sensitive environmental resources and community character. The Project will

consolidate the development footprint through an Administrative Permit for lot area averaging, which allows for lots smaller than the minimum lot size prescribed by zoning for the site. Along with the proposed 1.43 acres of biological open space, lot area averaging will allow the Project to achieve the maximum density allowed in the General Plan while avoiding impacts to biological resources onsite by consolidating the development footprint away from the sensitive vegetation.

The Project is consistent with the maximum density allowed under the Village Residential 2 (VR-2) General Plan Land Use Designation for the site. According to General Plan Table LU-1, *Land Use Designations and Compatible Regional Categories*, the VR-2 designation allows for a maximum density of 2 units per gross acre, as evaluated in the General Plan Update Environmental Impact Report (GPU EIR). The Project site Land Use Designation of Village Residential (VR-2) is not a slope dependent category, and the site does not contain any steep slopes.

Using these criteria, the maximum allowable density is 20 dwelling units as proposed in the Project and consistent with the General Plan. The project proposes lots ranging in size from 0.22 acres to 0.56 acres. The average lot size of the project is approximately 0.33 acres, which is consistent with a majority of surrounding development. Available aeriels and parcel data demonstrates that there are hundreds of similarly sized parcels in the immediate vicinity (<0.1 miles radius) of the Project site. Additionally, staff have made the required findings for lot area averaging pursuant to Zoning Ordinance Section 4230(b), which are further discussed below. By using lot area averaging, the project is able to achieve the maximum allowable density while avoiding the sensitive biological resources on the site. The Form of Decision of Approval for lot area averaging (PDS2020-AD-20-007) is included in Attachment B.

### Access, Circulation and Parking

Access to the development will be provided by a new private road connecting to Idaho Avenue at the northernmost portion of the site (Figure 3, yellow star). Two 24-foot-wide improved private roads will provide access to all 20 lots. Each lot will contain a private garage and individual driveway for parking.

### Municipal Services

The Project will be served water by the City of Escondido; fire service by the Escondido Fire Department; and school services by the Escondido Union School District and the Escondido Union High School District. Sewer services are not required as the Project will include individual septic systems for each lot.

The Project has demonstrated that all necessary services and facilities are available as required by the General Plan and Board of Supervisors Policy I-84 (Project Facility Availability Forms for Water, School, and Fire Services). Project Facility Availability Forms have been provided for all services and are included in Attachment G, Service Availability Forms.



Figure 4: Existing Site Photo (Looking southeast from Idaho Avenue and San Pasqual Valley Road)

## F. **ANALYSIS AND DISCUSSION**

The Project has been reviewed for conformance with all relevant ordinances and guidelines, including the San Diego County General Plan, the North County Metropolitan Subregional Plan, the County Zoning Ordinance, the County Subdivision Ordinance, and CEQA Guidelines. A discussion of the Project's consistency with applicable codes, policies, and ordinances is described on the following pages.

### 1. **Key Requirements**

- a. Is the proposed Project consistent with the vision, goals, and policies of the General Plan?
- b. Does the Project comply with the policies set forth under the North County Metropolitan Subregional Plan?
- c. Is the proposed Project consistent with the County's Zoning Ordinance?
- d. Is the proposed Project consistent with the County's Subdivision Ordinance?
- e. Is the Project consistent with other applicable County regulations?
- f. Does the Project comply with CEQA?

### 2. **Project Analysis**

Conservation Subdivision and Lot Area Averaging

Because of the presence of woodlands and a drainage onsite, the Project has been designed as a conservation subdivision to reduce impacts by consolidating the development footprint in the least environmentally sensitive portions of the site.

County Subdivision Ordinance Section 81.401(r) allows for projects to be designed as conservation subdivisions provided, among other criteria, that the development footprint is consolidated to the maximum extent permitted by County regulations and applicable Community Plans to ensure development is located in the least environmentally sensitive areas of the land being subdivided. To achieve this, the Project proposes an Administrative Permit for lot area averaging, which allows for lots smaller than the minimum lot size prescribed by Zoning for the site. Staff recommends that the required findings for the Administrative Permit can be made, including that: the size, design, grading and location of the lots will be compatible with and will not adversely affect or be materially detrimental to adjacent uses; the total number of lots (excluding those reserved for open space) shall not exceed the number obtained by dividing the total net area of the proposed subdivision by the minimum lot size; all lots and easements designed for open space be for the preservation of environmentally sensitive areas and will be permanently reserved for open space; and the proposed subdivision and the total number and location of the proposed lots will be consistent with the General Plan.

Additionally, consistent with Section 81.401(r), the Project includes approximately 1.43 acres of dedicated biological open space along the eastern boundary of the site to preserve RPO sensitive habitat identified onsite (Figure 3, shown in green). A 30-foot Limited Building Zone (LBZ) extending outward from the boundary of the open space easement is included to ensure protection of the open space from building and fire clearing activities (Figure 8). The project is located in a Local Responsibility Area (LRA) and does not have a designation in the Fire Hazard Severity Zone Map; Therefore, it is not in a Moderate, High or Very High Fire Hazard Severity Zone. It was determined by the San Diego County Fire Protection District and the City of Escondido Fire Department that a 30-foot LBZ is sufficient because of its lack of designation in the Fire Hazard Severity Zone Map and because the area is surrounded by developed lots and is not considered a large open space area. Additionally, the proposed open space is relatively small and contains vegetation not typically conducive to wildfire such as nonnative grassland and walnut woodlands. By implementing design features such as lot area averaging and preserving biological resources within open space easements, the Project will conform to the RPO while achieving the density allowed by the General Plan. Additionally, as considered by the GPU EIR, project impacts to sensitive habitat and/or species will be mitigated through ordinance compliance and through implementation of the following mitigation measures: preservation of 4.6 acres of non-native grassland habitat within a County approved mitigation bank, the preservation of 0.4 acres of walnut woodland within an onsite open space easement, the dedication of an onsite open space easement over 0.8 acres of non-native grassland and 0.2 acres of eucalyptus woodland habitat in order to achieve avoidance, implementation of preconstruction bat surveys to avoid impacts to foliage-roosting bats, and breeding season avoidance to prevent brushing, clearing, and/or grading between February 1 and August 31. The GPU EIR identified these mitigation measures as Bio 1.6 and Bio 1.7.

### Traffic Safety and Vehicle Miles Travelled (VMT)

The project will take access from Idaho Avenue, a public road, which is a Light Collector Road in the Mobility Element of the General Plan. A Sight Distance Analysis was prepared to determine the length of roadway that is visible to a driver from the proposed project entrance road. The analysis demonstrates that the proposed project has over 400 feet of unobstructed sight distance in both the eastbound and westbound directions from the proposed intersection of the private entrance road and Idaho Avenue. Based on the design speed of the road, an unobstructed sight distance of 400 feet is required, therefore the project meets this requirement.

Road improvements are required along the project frontage to widen Idaho Avenue to a uniform 42 feet from its current varying width. A left turn lane will be added to allow vehicles to turn into the project site from westbound Idaho Avenue.

Senate Bill 743 (SB 743) was signed into law on September 27, 2013, and changed the way that public agencies evaluate transportation impact under CEQA. A key element of this law is the elimination of using auto delay or level of service (LOS) and other similar measures of vehicular capacity or traffic congestion as a basis for determining significant transportation impacts under CEQA.

In response, the Governor's Office of Planning and Research (OPR) prepared updated CEQA Guidelines to establish new criteria for determining the significance of transportation impacts. Based on input from the public, public agencies, and various organizations, OPR recommended that Vehicle Miles Traveled (VMT) be the primary metric for evaluating transportation impacts under CEQA. VMT measures the number of vehicle trips generated and the length or distance of those trips.

The County of San Diego published Transportation Study Guidelines dated May 2020 which were formally adopted by the County Board of Supervisors on June 24th, 2020. The Board voted to adopt a significance threshold for projects producing VMT of 15% below the unincorporated County VMT average. The original 15183 determination was set out for a public disclosure period on July 15, 2021. This threshold was in effect on the date the CEQA determination for the project was set out for a public disclosure period, and as of that date, the Project's VMT impacts were below the threshold of significance established by the Board. On September 15, 2021, the Board rescinded the TSG based on guidance from the State and directed staff to investigate 13 items related to VMT for projects in the unincorporated area, including more opportunities for infill development, creation of transit accessible areas, opportunities for affordable housing, VMT mitigation programs, as well as other directed items. On February 9, 2022, the Board provided direction to staff to return with a new TSG with a threshold based on the State's recommendation of 15% below the regional average. The Board also directed staff to include a new screening criteria for identified Infill Areas and surrounding general plan village boundaries excluding high and very high fire severity zones. Projects located within an identified Infill Area would not have to do VMT analysis or mitigation.

The Project is located within one of the proposed Infill Areas, as identified in the County's Draft Transportation Study Guide (Draft TSG). While the Draft TSG has not been adopted, it utilizes a technical memorandum entitled *Infill Areas in Unincorporated San Diego County* (County Infill Memo) dated October 29, 2021, to provide guidance and criteria on how Infill Areas were identified as well as substantial evidence of why there are no significant impacts for projects which are located within Infill Areas. The County Infill Memo identifies the Project area as an infill area, therefore additional



VMT analysis is not warranted. The County does not currently have adopted guidelines for VMT analysis; therefore, the Project is proposing a project specific threshold using the site's location within an Infill Area, which has a higher population, more road intersections, and is closer to jobs. The 15183 Checklist was updated to incorporate changes to the Project's VMT analysis, and a second CEQA 15183 public disclosure period of was conducted from March 31, 2022 to May 2, 2022 (33 days). No significant direct or cumulative VMT impact would occur, and mitigation measures are not required.

#### Fire Safety

The project is located in a Local Responsibility Area (LRA) and does not have a designation in the Fire Hazard Severity Zone Map; Therefore, it is not in a Moderate, High or Very High Fire Hazard Severity Zone. The Project site is located within the jurisdiction of the Escondido Fire Department and is approximately 1.8 miles from the nearest fire station, Escondido Fire Station #2. Based on the service availability form completed by the Escondido Fire Department, the expected emergency vehicle travel time will be four minutes to the project, which meets the response time requirement of five minutes in the Safety Element of the County General Plan. A Fire Protection Plan (FPP) was prepared for the Project, which was accepted by the Escondido Fire Department on February 11, 2021.

The FPP identified wildland fire risks for the Project. However, it was determined that these wildland fire risks will be mitigated to less than significant levels with the incorporation of project design features. Typically, projects located within a wildland interface zone would require a 100-foot Limited Building Zone (LBZ). The Escondido Fire Department indicated that a 30' LBZ on lots 14, 15, and 16 and adjacent to the proposed drainage basin (Figure 8, shown in purple) is sufficient because the area is surrounded by developed lots, rather than a large open space area. The onsite open space is also relatively small, and this vegetation is not typically conducive to wildfire. In addition, because the open space is between a major roadway and the development, the 30-foot LBZ will be sufficient. For lots 1 through 7, a 6-foot-tall wall will be constructed along the rear of lots to provide additional fire protection to those lots (Figure 8, shown in red). The remaining lots on the perimeter of the project are adjacent to the public road so additional clearing is not required. The project will also include adequate roads for emergency vehicle access (in terms of dimension, slope, paving materials, etc.), ignition-resistant construction standards, installation of fire hydrants, and available and sufficient water supply to the Project. The distance from the furthest cul-de-sac to Idaho Avenue, the point at which allows egress in two separate directions, is approximately 480 feet. The maximum allowable dead-end road length for the site is 1,320 feet. The Project design meets dead-end road length requirements of 1,320 feet.

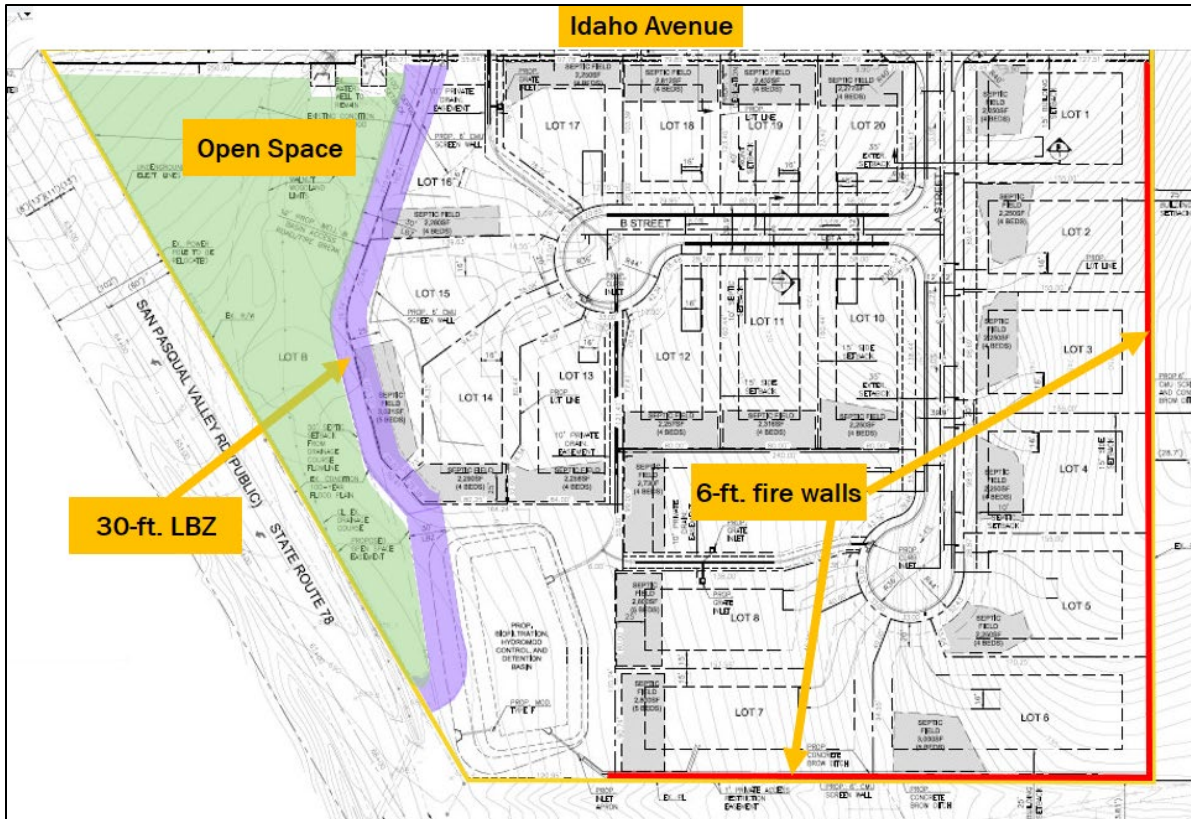


Figure 5: Limited Building Zone; Biological Open Space Easement and Fire Walls

### Noise

The Project is subject to the County Noise Ordinance and Noise Element. The site is located adjacent to San Pasqual Valley Road, and thus will be impacted by traffic noise from the road. The County Noise Element requires exterior noise levels to not exceed 60 dBA CNEL for single family residences. The County General Plan Update showed that the nearby roads are anticipated to expose the project site to levels that exceed 60 dBA CNEL. Based on a Noise Report, the construction of a five-foot tall wall on Lot 13, and six-foot tall walls on lots 14 through 16, will reduce the exterior noise levels on those parcels to comply with the Noise Element. The report also demonstrates that even with the integration of the noise walls, the second-floor interior noise within the residences is anticipated to exceed the noise requirements. Therefore, a noise easement will be applied to those lots to ensure that the interior noise levels of future dwelling units comply with the Noise Element requirements. When the developer or a future owner applies for a building permit, an additional noise study will be required which will determine the building measures necessary to reduce the interior noise levels to comply with the required standards. These measures may include the use of dual pane windows and upgraded insulation that reduces noise.

### Housing

The project includes single family detached homes with garages. One public comment letter suggested that the Project should be revised to include affordable housing through increased density opportunities such as duplexes, townhomes, or accessory dwelling units. The current zoning and General Plan do not allow higher densities due to constraints such as septic capacity and setback

requirements based on the current County Zoning Ordinance. These particular constraints, however, would not prohibit Accessory Dwelling Units from being built on the property by either the developer or individual homeowners in accordance with State and County statutes and guidelines.

**3. General Plan Consistency**

The site is subject to the General Plan Regional Category Village Residential and Land Use Designation VR-2. The proposed Project is consistent with the following relevant General Plan goals, policies, and actions as described in Table E-1.

*Table E-1: General Plan Conformance*

<b>General Plan Policy</b>	<b>Explanation of Project Conformance</b>
<p><b>LU-1.9 Achievement of Planned Densities.</b> Recognizing that General Plan was created with the concept that subdivisions will be able to achieve densities shown on the Land Use Map, planned densities are intended to be achieved through the subdivision process except in cases where regulations or site-specific characteristics render such densities infeasible.</p>	<p>The Project site has a land use designation of Village Residential (VR-2). Density for the site was calculated using Table LU-1, <i>Land Use Designations and Compatible Regional Categories</i>. Maximum density is 2 units per gross acre on the 10.23-acre site which allows 20 dwelling units. The Land Use Designation of VR-2 is not a slope dependent category, and the site does not contain any steep slopes. The Project proposes 20 single-family residential lots, consistent with the density allocated by the General Plan.</p>
<p><b>LU-6.4 Sustainable Subdivision Design.</b> Require that residential subdivisions be planned to conserve open space and natural resources, protect agricultural operations including grazing, increase fire safety and defensibility, reduce impervious footprints, use sustainable development practices, and, when appropriate, provide public amenities.</p>	<p>Sensitive biological resources (RPO sensitive habitat) are present onsite and will be avoided to the maximum extent feasible through site design features consistent with the County Zoning Ordinance and Subdivision Ordinance criteria for the design of conservation subdivisions. By implementing mechanisms such as lot area averaging and preserving RPO sensitive habitat within biological open space, the Project will consolidate its development footprint, minimize impacts to the environment and preserve natural features from future development while also achieving the density allocated by the General Plan.</p> <p>Additionally, the Project incorporates a 30-foot fuel modification zone extending outward from the future units on the perimeter lots. The Project area is not within the wildland interface area, where a 100-foot LBZ would typically be required. It was determined that a 30-foot LBZ is sufficient because the area is surrounded by</p>

	<p>developed lots and not a large open space area. The fuel modification zone has been designed in a way that maximizes defensibility from potential wildland fires and avoids impacting biological resources preserved within the open space easement.</p>
<p><b>LU-9.9 Residential Development Pattern.</b> Plan and support an efficient residential development pattern that enhances established neighborhoods or creates new neighborhoods in identified growth areas.</p>	<p>The Project will be consistent with the surrounding developed neighborhood, which includes a variety of lot sizes and architectural styles. Within a 0.5-mile radius of the project site, nearly one half of the lots are 0.5 acre or less in size. The project proposes lots ranging in size from 0.22 acres to 0.56 acres. The average lot size of the project is approximately 0.33 acres, which is consistent with a majority of surrounding development.</p>
<p><b>LU-10.2 Development - Environmental Resource Relationship.</b> Require development in Semi-Rural and Rural areas to respect and conserve the unique natural features and rural character and avoid sensitive or intact environmental resources and hazard areas.</p>	<p>The Project recognizes the presence of RPO sensitive habitat onsite and proposes to avoid impacts through site design features consistent with Subdivision Ordinance Section 81.401(r) for the design of conservation subdivisions.</p>
<p><b>M-2.2 Access to Mobility Element Designated Roads.</b> Minimize direct access points to Mobility Element roads from driveways and other non-through roads to maintain the capacity and improve traffic operations.</p>	<p>Individual driveways will not have direct access to Idaho Avenue, which is a General Plan Mobility Element Road. The Project will include one entrance connecting to Idaho Avenue, a public road, at the northern-most portion of the site. There will be no direct access to San Pasqual Valley Road (SR-78), a Caltrans roadway.</p>
<p><b>M-4.4 Accommodate Emergency Vehicles.</b> Design and construct public and private roads to allow for necessary access for appropriately sized fire apparatus and emergency vehicles while accommodating outgoing vehicles from evacuating residents.</p>	<p>The Project will include two private roads, each terminating in a cul-de-sac. The private roads have been designed to the satisfaction of the Escondido Fire Department and the County of San Diego Private Road Standards.</p>
<p><b>COS-2.2 Habitat Protection through Site Design.</b> Require development to be sited in the least biologically sensitive areas and minimize the loss of natural habitat through site design.</p>	<p>The Project consolidates the development footprint in the least environmentally sensitive areas of the site using lot area averaging and will preserve approximately 1.43 acres of natural habitat in a biological open space easement dedicated to the County.</p>
<p><b>S-3.1 Defensible Development.</b> Require development to be located, designed, and constructed to provide adequate defensibility</p>	<p>The Project includes a 30-foot fuel modification zone extending out from the future structures for the perimeter lots in which flammable</p>

<p>and minimize the risk of structural loss and life safety resulting from wildland fires.</p>	<p>vegetation or other combustible growth will be cleared. The Project area is not within the wildland interface area, where a 100-foot LBZ would typically be required, because the Project's open space is located between a major roadway and the development. It was determined that a 30-foot LBZ is sufficient because the area is surrounded by developed lots and not a large open space area. Additionally, the proposed open space is rather small and contains vegetation not typically conducive to wildfire. In addition, six-foot-tall non-combustible CMU walls will be installed along the rear of lots 1 through 7 for additional fire protection. The lots on the perimeter of the project are adjacent to the public road so additional clearing is not required. The fuel modification zones will ensure adequate fire defensibility is provided from potential wildfires.</p>
<p><b>S-3.4 Service Availability.</b> Plan for development where fire and emergency services are available or planned.</p>	<p>A 399F Fire Availability Form was signed by the Escondido Fire Department and is on file with PDS. The Project meets emergency vehicle travel time and dead-end road length requirements.</p> <p>Expected emergency vehicle travel time will be four minutes to the Project, which meets the travel time requirement of five minutes in the Safety Element of the General Plan. Additionally, the distance from the furthest cul-de-sac to Idaho Avenue, the point at which allows egress in two separate directions, is approximately 480 feet. The maximum allowable dead-end road length for the site is 1,320 feet. The Project design meets dead-end road length requirements of 1,320 feet.</p>

**4. North County Metropolitan Subregional Plan Consistency**

The Project is consistent with the following relevant North County Metropolitan Subregional Plan goals, policies, and actions as described in Table E-2.

*Table E-2: North County Metropolitan Subregional Plan Conformance*

Subregional Plan Policy	Explanation of Project Conformance
Resource Conservation Areas (RCAs). Lands identified as RCAs require special attention in order to conserve resources in a manner best satisfying public and private objectives. The appropriate implementation actions will vary but may include establishment of open space easements, cluster zoning (i.e., lot area averaging), incorporating special design considerations into subdivision maps, etc.	The project site is not identified within a Resource Conservation Area (RCA).

**5. Zoning Ordinance Consistency**

The Project site is zoned Limited Agricultural (A70), which will not change with the proposed Project.

*Table E-3: Zoning Ordinance Development Regulations*

ZONING REGULATIONS	CURRENT	CONSISTENT?
Use Regulation:	A70	Yes
Animal Regulation:	L	Yes
Density:	-	Yes
Lot Size:	0.5 AC	Yes (Upon approval of AD)
Building Type:	C	Yes
Height:	G (35')	Yes
Lot Coverage:	-	Yes
Setback:	C	Yes
Open Space:	-	Yes
Special Area Regulations:	-	Yes

**6. Subdivision Ordinance Consistency**

The Project has been reviewed for compliance with the Subdivision Ordinance. The Project is consistent with the requirements for major subdivisions in terms of design (Section 81.401), dedication and access (Section 81.402) and improvements (Sections 81.403 and 81.404) such as improving Idaho Avenue along the project frontage to public road standards, improving the onsite private road to private road standards, achieving minimum design criteria for the onsite cul-de-sacs and achieving minimum lot depth requirements for each residential lot. The Project includes requirements and conditions of approval necessary to ensure the Project is implemented in a manner consistent with the Subdivision Map Act and the Subdivision Ordinance.

**7. California Environmental Quality Act (CEQA) Compliance**

The Project has been reviewed for compliance with CEQA, and a 15183 Checklist was prepared. California Public Resources Code Section 21083.3 and CEQA Guidelines Section 15183 provide an exemption from additional environmental review for projects that are consistent with the development density established by existing zoning, community plan or general plan policies for which an Environmental Impact Report (EIR) was certified.

The County of San Diego General Plan Update (GPU) establishes a blueprint for future land development in the unincorporated County. The Project is consistent with the analysis performed for the GPU EIR. The GPU EIR adequately anticipated and described the impacts of the proposed project, identified applicable mitigation measures necessary to reduce project specific impacts, and the Project implements these mitigation measures. A Notice of Exemption and 15183 Checklist are included in Attachment E.

The 15183 determination was set out for a public disclosure period on July 15, 2021. As of that date, the project’s VMT impacts were below the threshold of significance established by the Board. As noted below, one public comment letter questioned the County’s use of the threshold of significance for Vehicle Miles Traveled (VMT) established in the Transportation Study Guidelines (TSG) adopted by the Board on June 24, 2020. On September 15, 2021, the Board rescinded the TSG. The County does not currently have adopted guidelines for VMT analysis; therefore, the Project is proposing a project specific threshold of below the regional average VMT per capita. The 15183 Checklist was updated to address the public comment letter and incorporate changes to the Project’s VMT analysis. A second CEQA 15183 public disclosure period was conducted. Four public comment letters were received; two requesting continued coordination with other agencies, one requesting affordable units, and one addressing hydrology and the VMT analysis, despite the changes made to the 15183 regarding VMT. The County’s response to the letter discussing VMT provided justification for the infill classification of the project, demonstrated sufficient evidence and analysis for the 15183, and demonstrated the appropriateness of the density of the project.

**8. Applicable County Regulations**

*Table E-4: Applicable Regulations*

<b>County Regulation Policy</b>	<b>Explanation of Project Conformance</b>
a. Resource Protection Ordinance (RPO)	The Project will not impact any wetlands, floodplains/floodways, steep slopes, or sensitive habitat lands as defined by the RPO. Onsite sensitive habitat will be preserved within a permanent open space easement. Therefore, it has been found that the proposed Project complies with the RPO.
b. County Consolidated Fire Code	The proposed Project was reviewed and approved by the Escondido Fire Department and the County Fire Authority.
c. Noise Ordinance	A Noise Study was prepared for the Project and accepted by County staff. The site is located adjacent to San Pasqual Valley Road and would be impacted by the noise levels from this roadway and require mitigation. Based on the noise report, the construction of a 5-foot-tall noise wall along the rear of lot 13, and 6-foot-tall noise walls along the rear of lots 14 through 16, would reduce the exterior noise levels on those impacted parcels to conform with the General Plan. The report also demonstrates that even with the integration of the noise walls, the second-floor interior noise for lots 1 through 3 and lots 6 through 20 are anticipated to exceed

	the noise requirements. Therefore, a noise easement will be applied to those lots to ensure that the future homes will be constructed to include enhanced measures (such as dual-paned windows, additional insulation, etc.) to achieve interior noise levels in compliance with the Noise Element requirement.
d. Light Pollution Code	The Project does not propose outdoor lighting at this time. However, all future lighting will be required implement outdoor lighting and glare controls, such as the use of low lumen lights that are shielded down, to ensure compliance with the Light Pollution Code.
e. Watershed Protection Ordinance (WPO)	A Priority Development Project Stormwater Quality Management Plan (PDP SWQMP) and Preliminary Drainage Study were prepared for the Project in compliance with the WPO. A detention basin will be installed at the southwest portion of the site to capture runoff from the project. The project is conditioned to maintain all storm water facilities.
f. Park Lands Dedication Ordinance (PLDO)	The Department of Parks and Recreation reviewed the project and determined Park Land dedication is not required because the Project includes less than 50 homes. The Project complies with the PLDO by paying the required PLDO fees in-lieu of park land dedication. The fees will be collected prior to issuance of the first building permit.
g. Multiple Species Conservation Program (MSCP)	The project site is located outside the boundaries of the County's Multiple Species Conservation Program (MSCP). Therefore, conformance with the Multiple Species Conservation Program and the Biological Mitigation Ordinance is not required.

**G. COMMUNITY PLANNING GROUP (CPG)**

The Project site is not located in an area represented by a Community Planning Group (CPG) nor Community Sponsor Group (CSG). Therefore, neither a recommendation from a CPG nor a CSG were received. However, County staff held an online community meeting on July 20, 2021, to provide members of the public an opportunity to learn about the project and ask questions. A total of 3 members of the public attended as well as County staff and the applicant. One neighbor asked whether a left turn lane would be added on Idaho Avenue for vehicles to turn into the project entrance. A left turn lane will be constructed as part of the required improvements to Idaho Avenue. No additional concerns or questions were raised. A copy of the staff presentation was posted on the PDS CEQA review webpage after the meeting.

**H. PUBLIC INPUT**

The Project was noticed to surrounding property owners within 300 feet of the project boundaries upon application submittal on May 14, 2020, and staff received emails from four adjacent neighbors with questions and concerns about the development. A CEQA 15183 public disclosure period from July 15



to August 16, 2021, was conducted. Public notification was provided to surrounding property owners within 1,000 feet of the project boundaries and to the following tribes: Pala Band of Mission Indians, Pechanga Band of Mission Indians, San Pasqual Band of Mission Indians, Sycuan Band of the Kumeyaay Nation, and Viejas Band of Kumeyaay Indians. Staff received 2 comment letters (Attachment F). One from the San Diego County Archaeological Society indicating that they concur with the proposed mitigation monitoring program defined in the CEQA 15183 Checklist. Another from Coast Law Group regarding the County’s use of the adopted Vehicle Miles Traveled (VMT) Transportation Study Guidelines (TSG) for the project’s CEQA VMT analysis and updated guidance from the State Office of Planning and Research.

As discussed in Section F.2 Traffic Safety, the County of San Diego published Transportation Study Guidelines dated May 2020 which were formally adopted by the County Board of Supervisors on June 24, 2020. The Board voted to adopt a significance threshold for projects producing VMT of 15% below the unincorporated County VMT average. This threshold was in effect on the date the CEQA determination for the project was first set out for a public disclosure period in July 2021. On September 15, 2021, the Board rescinded the TSG. The County does not currently have adopted guidelines for VMT analysis; therefore, the Project is proposing a project specific threshold that relies on the location of the project within an infill area, which has higher densities, more intersections, and are closer to jobs. Subsequently the 15183 Checklist was updated to address the public comment letter and incorporate changes to the Project’s VMT analysis. A second CEQA 15183 public disclosure period from March 31 to May 2, 2022, was conducted. Four public comment letters were received; two requesting continued coordination with other agencies, one requesting affordable units, and one addressing hydrology and the VMT analysis, despite the changes made to the 15183 regarding VMT. The County’s response to the letter discussing VMT provided justification for the infill classification of the project, demonstrated sufficient evidence and analysis for the 15183, and demonstrated the appropriateness of the density of the project.

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**Report Approved By:**  
Dahvia Lynch, Director  
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**AUTHORIZED REPRESENTATIVE:** \_\_\_\_\_

DAHVIA LYNCH, DIRECTOR

**ATTACHMENTS:**  
Attachment A – Environmental Findings

Attachment B – Form of Decision Approving PDS2020-AD-20-007  
Attachment C – Tentative Map Resolution PDS2020-TM-5639  
Attachment D – Planning Documentation  
Attachment E – Environmental Documentation  
Attachment F – Public Documentation  
Attachment G – Service Availability Forms  
Attachment H – Ownership Disclosure

## **Attachment A – Environmental Findings**

**ESCONDIDO ESTATES SUBDIVISION**

**PDS2020-TM-5639; PDS2020-AD-20-007**

**ENVIRONMENTAL FINDINGS**

**July 22, 2022**

**CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) FINDINGS**

- 1) Find that the Planning Commission has reviewed and considered the information contained in the CEQA 15183 Checklist on file with Planning & Development Services as Environmental Review Number PDS2020-ER-20-08-007 before deciding whether to approve or deny the proposed project.
- 2) Adopt the Mitigation and Monitoring Program as incorporated into the project conditions of approval pursuant to CEQA Guidelines section 15074(d).
- 3) Find that the proposed project is consistent with the Resource Protection Ordinance (RPO) (County Code, Section 86.601 et seq.).
- 4) Find that plans and documentation have been prepared for the proposed project that demonstrate that the project complies with the Watershed Protection, Stormwater Management, and Discharge Control Ordinance (County Code, Section 67.801 et seq.).

**Attachment B – Form of Decision  
Approving PDS2020-AD-20-007**



# County of San Diego

**KATHLEEN A. FLANNERY**  
ACTING DIRECTOR

PLANNING & DEVELOPMENT SERVICES  
5510 OVERLAND AVENUE, SUITE 310, SAN DIEGO, CA 92123  
(858) 505-6445 General • (858) 694-2705 Codes  
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www.SDCPDS.org

**VINCE NICOLETTI**  
ACTING ASSISTANT DIRECTOR

**July 22, 2022**

<b>PERMITEE:</b>	OSCAR URANGA
<b>ADMINISTRATIVE PERMIT:</b>	PDS2020-AD-20-007
<b>E.R. NUMBER:</b>	PDS2020-ER-20-08-007
<b>PROPERTY:</b>	SAN PASQUAL VALLEY ROAD AND IDAHO AVENUE; NORTH COUNTY METROPOLITAN
<b>APN(S):</b>	234-231-01

This Administrative Permit for lot area averaging has been approved in conjunction with Tentative Map PDS2020-TM-5639 (Escondido Estates Subdivision). This permit authorizes lots in the Escondido Estates Subdivision project to be smaller than would otherwise be allowed by the applicable lot area designator pursuant to Section 4230 of the Zoning Ordinance.

Environmental mitigation measures or other conditions of approval required and identified on the associated Tentative Map, Preliminary Grading Plan and/or the Resolution of San Diego County Conditionally Approving Tentative Map No. 5639, shall be completed or implemented on the final engineering plan before any final improvement or grading plan can be approved and any permit issued in reliance of the approved plan. Any substantial deviation therefrom the Preliminary Grading and Improvement Plan may cause the need for further environmental review. Additionally, approval of the preliminary plan does not constitute approval of a final engineering plan. A final engineering plan shall be approved pursuant to [County of San Diego Grading Ordinance \(Sec 87.701 et. al.\)](#)

**AD PERMIT EXPIRATION:** This Administrative Permit shall expire concurrently with Tentative Map PDS2020-TM-5639. Recordation of a Final Map pursuant to Tentative Map PDS2020-TM-5639 shall be deemed to establish commencement of construction and/or use of the property in reliance on this permit.

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**SPECIFIC CONDITIONS:** Compliance with the following Specific Conditions (Mitigation Measures when applicable) shall be established before the property can be used in reliance upon this Administrative Permit. Where specifically indicated, actions are required prior to approval of any grading, improvement, building plan and issuance of grading, construction, building, or other permits as specified:

**ANY PERMIT:** *(Prior to the approval of any plan, issuance of any permit, and prior to occupancy or use of the premises in reliance of this permit).*

**1. GEN#1–COST RECOVERY**

**INTENT:** In order to comply with Section 362 of Article XX of the San Diego County Administrative Code, Schedule B.5, existing deficit accounts associated with processing this permit shall be paid. **DESCRIPTION OF REQUIREMENT:** The applicant shall pay off all existing deficit accounts associated with processing this permit. **DOCUMENTATION:** The applicant shall provide evidence to Planning & Development Services, Zoning Counter, which shows that all fees and trust account deficits have been paid. No permit can be issued if there are deficit trust accounts. **TIMING:** Prior to the approval of any plan and prior to the issuance of any permit and prior to use in reliance of this permit, all fees and trust account deficits shall be paid. **MONITORING:** The PDS Zoning Counter shall verify that all fees and trust account deficits have been paid.

**2. GEN#2–RECORDATION OF DECISION**

**INTENT:** In order to comply with Section 7019 of the Zoning Ordinance, this Administrative Permit decision shall be recorded to provide constructive notice to all purchasers, transferees, or other successors to the interests of the owners named, of the rights and obligations created by this permit. **DESCRIPTION OF REQUIREMENT:** The applicant shall sign, notarize with an 'all-purpose acknowledgement' form and return the original recordation form to PDS. **DOCUMENTATION:** Signed and notarized original recordation form. **TIMING:** Prior to the approval of any plan and prior to the issuance of any permit and prior to use in reliance of this permit, a signed and notarized copy of the Decision shall be recorded by PDS at the County Recorder's Office. **MONITORING:** The PDS Zoning Counter shall verify that the Decision was recorded and that a copy of the recorded document is on file at PDS.

**3. RECORDATION OF TENTATIVE MAP: [PDS, DPW, DEH, DPR], [GP, CP, BP, UO]**

**INTENT:** In order to comply with the approved project, the Final Map for PDS2020-TM-5639 shall be recorded prior to issuance of any permit. **DESCRIPTION OF REQUIREMENT:** The applicant shall record the Final Map for PDS2020-TM-5639. **DOCUMENTATION:** The applicant shall provide evidence that the Final Map for PDS2020-TM-5639 has been recorded. **TIMING:** Prior to approval of any plan, and prior to the issuance of any permit and prior to the use in reliance of this permit. **MONITORING:** The PDS Zoning Counter shall verify that PDS2020-TM-5639 has been recorded.

**DURING CONSTRUCTION:** *(The following actions shall occur throughout the duration of the grading construction).*

**(CULTURAL RESOURCES)**

#### 4. **CULT#GR-2 - ARCHAEOLOGICAL AND TRIBAL MONITORING – DURING CONSTRUCTION**

**INTENT:** In order to comply with the County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements for Cultural Resources, a Cultural Resource Grading Monitoring Program shall be implemented. **DESCRIPTION OF REQUIREMENT:** The Project Archaeologist and Native American Monitor(s) shall monitor the original cutting of previously undisturbed deposits in all areas identified for development including off-site improvements. The archaeological monitoring program shall comply with the following requirements during earth-disturbing activities:

- a. **Monitoring.** During the original cutting of previously undisturbed deposits, the Project Archaeologist and Native American Monitor(s) shall be onsite as determined necessary by the Project Archaeologist. Inspections will vary based on the rate of excavation, the materials excavated, and the presence and abundance of artifacts and features. The frequency and location of inspections will be determined by the Project Archaeologist in consultation with the Native American Monitor(s). Monitoring of the cutting of previously disturbed deposits will be determined by the Project Archaeologist in consultation with the Native American Monitor(s).
- b. **Inadvertent Discoveries.** In the event that previously unidentified potentially significant cultural resources are discovered:
  1. The Project Archaeologist or the Native American monitor(s) shall have the authority to divert or temporarily halt ground disturbance operations in the area of discovery to allow evaluation of potentially significant cultural resources.
  2. At the time of discovery, the Project Archaeologist shall contact the PDS Staff Archaeologist and culturally-affiliated tribes as identified in the Treatment Agreement and Preservation Plan.
  3. All ground disturbance activities within 100 feet of the discovered cultural resources shall be halted until a meeting is convened between the developer, the project archaeologist, tribal monitor(s), and the tribal representative(s) to discuss the significance of the find. Optionally, the County Archaeologist may attend the meeting to discuss the significance of the find.
  4. After consultation with the developer, project archaeologist, tribal monitor(s), and tribal representative(s), a decision shall be made, with the concurrence of the County Archaeologist, as to the appropriate mitigation (documentation, recovery, avoidance, etc.) for the identified cultural resources.
  5. After consultation with the developer, project archaeologist, tribal monitor(s), and tribal representative(s), a decision shall be made,



- with the concurrence of the County Archaeologist, as to the appropriate mitigation (documentation, recovery, avoidance, etc.) for the identified cultural resources.
6. Isolates and clearly non-significant deposits shall be minimally documented in the field. The isolates and/or non-significant deposits shall be reburied onsite as identified in the Treatment Agreement and Preservation Plan.
  7. After consultation with the developer, project archaeologist, tribal monitor(s), and tribal representative(s), a decision shall be made, with the concurrence of the County Archaeologist, as to the appropriate mitigation (documentation, recovery, avoidance, etc.) for the identified cultural resources.
  8. If cultural resources are identified, one or more of the following treatments, in order of preference, shall be employed:
    - a. Preservation in place of the Cultural Resources, if feasible. Preservation in place means avoiding the resources, leaving them in place where they were found with no development affecting the integrity of the resources.
    - b. Reburial of the resources on the project property. The measures for reburial shall include, at least, the following:
      - Measures and provisions to protect the future reburial area from any future impacts in perpetuity.
      - Reburial shall not occur until all legally required cataloging and basic recordation have been completed, with an exception that sacred items, burial goods and Native American human remains are excluded.
      - Any reburial process shall be culturally appropriate.
      - Listing of contents and location of the reburial shall be included in the confidential appendix of the Monitoring Report.
      - The Monitoring Report shall be filed with the County under a confidential cover and is not subject to Public Records Requests.
    - c. If preservation in place or reburial is not feasible, a Research Design and Data Recovery Program (Program) shall be prepared by the Project Archaeologist in consultation with the Tribe and Native American Monitor(s) and approved by the County Archaeologist prior to implementation. There shall be no destructive or invasive testing on sacred items, burial goods and Native American human remains. Results concerning finds of any inadvertent discoveries shall be included in the Monitoring Report.

Pursuant to Calif. Pub. Res. Code § 21083.2(b) avoidance is the preferred method of preservation for archaeological resources and cultural resources. If the landowner and the Tribe(s) cannot agree on

the significance or the mitigation for the archaeological or cultural resources, these issues will be presented to the Planning & Development Services Director for decision. The Planning & Development Services Director shall make the determination based on the provisions of the California Environmental Quality Act with respect to archaeological resources, recommendations of the project archeologist and shall take into account the cultural and religious principles and practices of the Tribe.

- c. **Human Remains.** If any human remains are discovered:
1. The Property Owner or their representative shall contact the County Coroner and the PDS Staff Archaeologist.
  2. Upon identification of human remains, no further disturbance shall occur in the area of the find until the County Coroner has made the necessary findings as to origin. If the human remains are to be taken offsite for evaluation, they shall be accompanied by the Native American monitor.
  3. If the remains are determined to be of Native American origin, the NAHC shall immediately contact the Most Likely Descendant (MLD).
  4. The immediate vicinity where the Native American human remains are located is not to be damaged or disturbed by further development activity until consultation with the MLD regarding their recommendations as required by Public Resources Code Section 5097.98 has been conducted.
  5. The MLD may with the permission of the landowner, or their authorized representative, inspect the site of the discovery of the Native American human remains and may recommend to the owner or the person responsible for the excavation work means for treatment or disposition, with appropriate dignity, of the human remains and any associated grave goods. The descendants shall complete their inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site.
  6. Public Resources Code §5097.98, CEQA §15064.5 and Health & Safety Code §7050.5 shall be followed in the event that human remains are discovered.
- d. **Fill Soils.** The Project Archaeologist and Native American monitor(s) shall evaluate fill soils to determine that they are clean of cultural resources.
- e. **Monthly Reporting.** The Project Archaeologist shall submit monthly status reports to the Director of Planning and Development Services starting from the date of the Notice to Proceed to termination of implementation of the archaeological monitoring program. The report

shall briefly summarize all activities during the period and the status of progress on overall plan implementation. Upon completion of the implementation phase, a final report shall be submitted describing the plan compliance procedures and site conditions before and after construction.

**DOCUMENTATION:** The applicant shall implement the Archaeological Monitoring Program pursuant to this condition. **TIMING:** The following actions shall occur throughout the duration of the earth disturbing activities. **MONITORING:** The [DPW, PDCI] shall make sure that the Project Archeologist is on-site performing the monitoring duties of this condition. The [DPW, PDCI] shall contact the [PDS, PPD] if the Project Archeologist or applicant fails to comply with this condition.

#### 5. **AQ#1 – FUGITIVE DUST**

**INTENT:** In order to mitigate for fugitive dust during construction activities.

**DESCRIPTION OF REQUIREMENT:** The project shall comply with the following Air Quality measures:

- a. All haul/dump trucks entering or leaving the site with soil or fill material must maintain at least two (2) feet of freeboard or cover loads of all haul/dump trucks securely.
- b. Dust control measures of the Grading Ordinance will be enhanced with a minimum of three (3) daily applications of water to the construction areas between dozer/scrapper passes and on any unpaved roads within the project limits.
- c. Grading is to be terminated in winds in excess of 25 miles per hour (mph).
- d. Sweepers and water trucks shall be used to control dust and debris at public street access points.
- e. Dirt storage piles will be stabilized by chemical binders, tarps, fencing, or other suppression measures.
- f. Internal construction-roadways will be stabilized by paving, chip sealing or chemicals after rough grading.
- g. A 15-mph speed limit on unpaved surfaces shall be enforced.

**DOCUMENTATION:** The applicant or designee shall comply with the Air Quality requirements of this condition. **TIMING:** The following actions shall occur throughout the duration of construction and grading. **MONITORING:** The [DPW, PDCI] shall make sure that the grading contractor complies with the Air Quality requirements of this condition. The [DPW, PDCI] shall contact the [DPLU, PCC] if the applicant fails to comply with this condition.

#### 6. **AQ#2 – CONSTRUCTION EXHAUST EMISSIONS**

**INTENT:** In order to mitigate for exhaust emissions during construction activities.

**DESCRIPTION OF REQUIREMENT:** The project shall comply with the following Air Quality and Greenhouse Gas measures:

- a. The project shall require the construction contractor to provide a construction fleet that uses heavy-duty diesel-powered equipment

equipped with Tier 4 diesel engines. An exemption from these requirements may be granted by the County in the event that the applicant documents that equipment with the required tier is not reasonably available and corresponding reductions in criteria air pollutant emissions are achieved from other construction equipment. Before an exemption may be considered by the County, the applicant shall be required to demonstrate that three construction fleet owners/operators in the San Diego Region were contacted and that those owners/operators confirmed Tier 4 equipment could not be located within the San Diego region.

- b. The project shall require the construction contractor to equip all heavy-duty diesel-powered construction equipment with diesel particulate filters (DPFs).

**DOCUMENTATION:** The applicant or designee shall comply with the Air Quality and Greenhouse Gas requirements of this condition. The applicant shall show compliance with this measure by providing the construction bid/estimate from the construction contractor that will be used. **TIMING:** Prior to approval of any grading and or improvement plans and issuance of any Grading or Construction Permits. **MONITORING:** The [DPW, PDC] shall make sure that the grading contractor complies with the Air Quality requirements of this condition. The [DPW, PDC] shall contact the [DPLU, PCC] if the applicant fails to comply with this condition.

***BUILDING PERMIT:*** (Prior to approval of any building plan and the issuance of any building permit).

#### 7. **NOISE#2–NOISE REQUIREMENT [PDS, FEE X1]**

**INTENT:** In order to reduce the exposure to noise levels in excess of standards established by the [County of San Diego General Plan Noise Element \(Table N-1 & N-2\)](#), and to mitigate the noise exposure of exterior noise sensitive land uses below levels of significance as evaluated in the [County Noise Guidelines for Determining Significance](#), the following design measures shall be implemented on the building plans and incorporated into the site design. **DESCRIPTION OF REQUIREMENT:** The following design elements and noise attenuation measures shall be implemented and indicated on the building plans and made conditions of its issuance:

- a. Prior to the approval of any Building Plan and issuance of any Building Permit the applicant shall install the required permanent noise barriers. Areas identified as requiring the barrier wall are as followed: 5-foot solid walls along the southern area of Lot 13 (edge of building pad) & 6-foot solid walls should be constructed on the western portion of the site adjacent or near San Pasqual Valley Road (Along lots 14 through 16) **OR** 10-foot barrier located along the right-of-way of San Pasqual Valley Road could be installed in lieu of individual noise walls at the pads. Refer to Figures 2-C and Figure 2-D of the Acoustical Analysis prepared by Ldn Consulting, Inc.

dated June 4, 2021 for locations of the walls/barrier. The applicant is required to incorporate the proposed project design recommendations and mitigation measures, into the Building Plans.

- b. The applicant shall construct the noise barriers with a height of 5-foot along Lot 13 and 6-foot solid walls along Lots 14 through 16. The walls should be constructed on the site adjacent or near San Pasqual Valley Road **OR** 10-foot barrier located along the right-of-way of San Pasqual Valley Road could be installed in lieu of individual noise walls at the pads. The barrier shall be at the height specified above. The barriers must be constructed of a non-gapping material consisting of masonry, wood, plastic, fiberglass, vinyl, steel, or a combination of those materials, with no cracks or gaps through or below the enclosure walls. Any exterior seams or cracks shall be filled or caulked. If wood is used, it can be tongue and groove and will be at least one-inch thick or have a surface density of at least 3.5 pounds per square foot. Any gate(s) will be of  $\frac{3}{4}$ -inch or thicker wood (same height), solid-sheet metal of at least 18-gauge metal, or an exterior-grade solid-core steel door with prefabricated door jambs. If vinyl fencing is used,  $\frac{3}{4}$ -inch or thicker solid panels on minimum 4x4-inch posts with no cracks or gaps through or below and all seams or cracks shall be filled or caulked. Sheet metal of 18-gauge (minimum) may be used, if it meets the other criteria and is properly supported and stiffened so that it does not rattle or create noise itself from vibration or wind. Any gate(s) proposed to be constructed in a sound wall must be designed with overlapping closures.

**DOCUMENTATION:** The applicant shall place the design elements or notes on the building plans and submit the plans to *[PDS, BPPR]* for review and approval.

**TIMING:** Prior to issuance of any building permit, the design elements and noise attenuation measures shall be incorporated into the building plans.

**MONITORING:** The *[PDS, BPPR]* shall verify that the specific note(s), and design elements, and noise attenuation measures have been placed on all sets of the building plans and made conditions of its issuance.

## 8. **AQ#3 – SUSTAINABILITY MEASURES**

**INTENT:** In order to promote sustainable project designs. **DESCRIPTION OF**

**REQUIREMENT:** The project shall comply with the following sustainability measures:

- a. The project would install either tankless electric or gas water heaters at each residential unit proposed.
- b. Low-flow faucets, kitchen faucets, toilets, and showers shall be installed at each residential unit with maximum flow rates of 1.5 gallons per minute at 60 psi.

- c. To support an overall reduction in onsite energy use, the project would install ENERGY STAR certified appliances in each residential unit proposed.
- d. To support water conservation efforts, the project would install one rain barrel at each residential unit proposed.
- e. The project would install solar photovoltaic (PV) at each residential unit proposed.
- f. The project would install one rain barrel for each residential unit.
- g. A Landscape Document Package shall be submitted that complies with the County's Water Conservation in Landscaping Ordinance and demonstrates a 40 percent reduction in current Maximum Applied Water Allowance for outdoor water use.
- h. Trees shall be planted on-site at a rate of two (2) trees per dwelling unit. At a minimum, the project shall plant 40 total trees.
- i. The project would divert 90 percent of inert and 70 percent of all other construction and demolition waste from a landfill.

**DOCUMENTATION:** The applicant shall comply with the requirements of this condition. **TIMING:** Prior to approval of any building plan or the issuance of any building permit, these design measures shall be implemented on the building plans and landscape plans. **MONITORING:** The [PDS, LA] and [DPR, TC, PP] shall review the Landscape Plans for compliance with these conditions. The [PDS, BPPR] shall verify that the Building Plans comply with the remaining conditions.

#### 9. **ROADS#14 DEBRIS MANAGEMENT REPORT (DMR)**

**INTENT:** In order to comply with the Grading Material Diversion Program, project recycling and diversion is designed to increase diversion of grading, land clearing, and brushing materials from landfills, extend the useful life of local landfills, and support construction and demolition project compliance with State waste diversion requirements. This includes grading, clearing and brushing material for grading projects over 5,000 cubic yards. For additional questions, please call (858) 694-2463 or email [CDRecycling@sdcounty.ca.gov](mailto:CDRecycling@sdcounty.ca.gov). **DESCRIPTION OF REQUIREMENT:** Prior to Rough Grade Inspection and release, and prior to issuance of any building permit, a Final Debris Management Report must be submitted for review and approval by the DPW Recycling Compliance Official. The report shall include:

- Project name.
- List of total weight, tonnage, or cubic yards of materials, by type, which was recycled, salvaged, or disposed of in a landfill.

- Provide copies of receipts for export facilities, haulers, or materials reused on site.
- Signed self-certification letter (see template).

**DOCUMENTATION:** Prior to Rough Grade Release and prior to issuance of any building permit, a final report shall be prepared and submitted for review and approval to the DPW Recycling Compliance Official. For additional questions, please call (858) 694-2463 or email [CDRecycling@sdcounty.ca.gov](mailto:CDRecycling@sdcounty.ca.gov). Templates for all forms required are available at:

[https://www.sandiegocounty.gov/content/sdc/dpw/recycling/NewCD\\_Grading.htm](https://www.sandiegocounty.gov/content/sdc/dpw/recycling/NewCD_Grading.htm)

**TIMING:** Prior to building permit issuance, and Rough Grading release, the Debris Management Final Report shall be prepared and submitted to DPW Recycling Official [DPW CO] for review and approval. **MONITORING:** The [DPW, CO] shall review and approve the DMR documents for the project. The [DPW, CO], shall forward the approval of the DMR to [DPW, PDCI] and [PDS, Building PCC] for compliance with this condition.

**OCCUPANCY:** *(Prior to any occupancy, final grading release, or use of the premises in reliance of this permit).*

#### 10. **NOISE#3–NOISE CONTROL DESIGN MEASURES [PDS FEE X1]**

**INTENT:** In order to reduce the exposure to noise levels in excess of standards established by the County of San Diego General Plan Noise Element (Table N-1 & N-2) , and to mitigate the noise exposure of exterior noise sensitive land uses below levels of significance as evaluated in the County Noise Guidelines for Determining Significance, the following design measures shall be verified that they are constructed. **DESCRIPTION OF REQUIREMENT:** The following noise control design measure(s) shall be constructed pursuant to the approved building plans:

- 1) Construct the noise barriers with a height of 5-foot along Lot 13 and 6-foot solid walls along Lots 14 through 16. The walls should be constructed on the site adjacent or near San Pasqual Valley Road OR 10-foot barrier located along the right-of-way of San Pasqual Valley Road could be installed in lieu of individual noise walls at the pads. Refer to Figures 2-C and Figure 2-D of the Acoustical Analysis prepared by Ldn Consulting, Inc. dated June 4, 2021 for locations of the walls/barrier. The barrier shall be at the height specified above. The barriers must be constructed of a non-gapping material consisting of masonry, wood, plastic, fiberglass, vinyl, steel, or a combination of those materials, with no cracks or gaps through or below the enclosure walls. Any exterior seams or cracks shall be filled or caulked. If wood is used, it can be tongue and groove and will be at least one-inch thick or have a surface density of at least 3.5 pounds per square foot. Any gate(s) will be of ¾-inch or thicker wood (same height), solid-sheet metal of at least 18-gauge metal, or an exterior-grade solid-core steel door with prefabricated door jambs. If vinyl fencing is used, ¾-inch or thicker solid panels on minimum 4x4-inch posts with no cracks or gaps through or below and all seams or cracks shall be filled or caulked. Sheet metal

of 18-gauge (minimum) may be used, if it meets the other criteria and is properly supported and stiffened so that it does not rattle or create noise itself from vibration or wind. Any gate(s) proposed to be constructed in a sound wall must be designed with overlapping closures.

**TIMING:** Prior to any occupancy, final grading release, or use of the premises in reliance of this permit, the noise control measure shall be installed and operational.

**MONITORING:** The [PDS, BI] shall verify that the noise control measures above have been constructed pursuant to the approved building plans and this permit's conditions.

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#### **ADMINISTRATIVE PERMIT FINDINGS:**

1. That the size, design, grading, and location of the proposed lots will be compatible with and will not adversely affect or be materially detrimental to adjacent uses, residents, buildings, structures, or natural resources, with consideration given to:
  - i. Harmony in lot size and configuration, building setbacks and orientation;

**Size:** The project proposes to subdivide an approximate 10.23-acre site into 20 single-family residential lots, ranging in size from approximately 0.22 to 0.56 acres, with an overall average lot size of approximately 0.33 acres. Eighteen lots would measure less than the required 0.5-acre minimum lot size, ranging in size from approximately 0.22 to 0.49 acres. Two lots would measure larger than the required 0.5-acre minimum lot size, one approximately 0.51 acres and the other approximately 0.56 acres in size. The larger lots in the subdivision would generally be located within the southern portion of the site adjacent to the neighboring lots to the south.

The total net area of the project site is approximately 9.98 acres. The total area divided by the number of proposed lots equals approximately one-half acre, which is similar to the average lot size of parcels located approximately 550 feet south and 775 feet to the southwest of the project site and in conformance with the minimum lots size requirement of the surrounding A70 zoned properties. Furthermore, lots to the north and east of the site which are zoned RS have a minimum lot size requirement of 10,000 square feet. Therefore, the proposed project is in harmony with the surrounding area because the lot sizes would be similar in size with parcels in the vicinity.

**Configuration:** Each of the proposed lots would conform to the design standards in the Subdivision Ordinance for lot width and depth. The project proposes mostly rectangular and polygon lots with private roads terminating in cul-de-sacs providing access to individual private driveways. This project



design is consistent with lots to the south and southwest of the site, since most also have a standard rectangular lot design.

**Building Setbacks:** Each of the proposed lots have been designed to allow for construction of a single-family residential dwelling that would conform to the setbacks established by the Zoning Ordinance, which are similar to setbacks applicable to the adjoining homes surrounding the property.

**Density:** The site is currently zoned Limited Agriculture (A70) Use Regulations, which allows for single-family residential development. The General Plan Designation is Village Residential (VR-2), which allows a maximum density of 20 dwelling units. The project is proposing 20 lots; therefore, it complies with the density established by the General Plan.

**Coverage:** The project would include parcel sizes ranging in size from approximately 0.22 to 0.56 acres. Typical homes on these proposed lots would generally range anywhere between 2,000 to 3,500 square feet, which would have a lot coverage ranging from approximately 0.17% to 16.74%. The majority of surrounding lots that are improved with single-family residences have similar lot sizes, and have similarly sized homes and coverage characteristics.

**Orientation:** While the project does not currently propose any structures, each of the 20 lots will be accessed from internal private driveways connecting to private roads. Therefore, these future homes will most likely be designed with the front of the houses and garages facing these internal private roads.

As described above, the project as designed would be in harmony with adjacent residential uses with regards to lot size, configuration, building setbacks and orientation.

- ii. The harmful effect, if any, upon desirable neighborhood character, including a finding that all lots in the subdivision which adjoin neighboring properties are compatible in size and shape to the adjoining lots, unless such adjoining area is to be reserved for open space or that adequate buffering has been provided to eliminate any significant harmful effect to neighboring properties;

Implementation of the project would include consolidating the development footprint to retain approximately 1.43 acres, or roughly 13.9% of the site into biological open space along the western boundary. A 30-foot Limited Building Zone extending from the edge of the easement onto the adjacent lots would provide adequate development separation from natural resources on the site. The larger lots would generally be located adjacent southern property boundary. No prominent landforms or other significant

natural features would be disturbed during grading since the consolidated design positions development in the least environmentally sensitive portions of the site. Additionally, the project proposes development near public roads and services, would not generate traffic that would adversely affect circulation patterns or cause significant congestion, and includes sensitive design such as on-site treatment of storm water run-off with the use of one stormwater bioretention basin, which would avoid impacts to land use and community character. With sensitive site design and thorough environmental analysis, impacts to community character are less than significant. The proposed development would not adversely impact existing uses within the project area, as the design of the proposed subdivision is intended to be compatible with existing and planned uses and all environmental impacts would be mitigated to a level below significance.

The proposed project would not have a harmful effect on neighborhood character because the proposed lot sizes are largely consistent with the immediate area, which includes several lots that measure less than 0.5 acres in size. Within a 0.5-mile radius of the project site, approximately 47%, or 310 of 672 lots are 0.5 acre or less in size. The project proposes lots ranging in size from 0.22 acres to 0.56 acres. The average lot size of the project is approximately 0.33 acres, which is consistent with a majority of surrounding development.

Additionally, the project proposes approximately 1.43 acres of biological open space along the western boundary of the site, which contains walnut woodland which would help maintain the existing character of the property along the roadway. This biological open space will also help to provide a buffer for the future homes on the project site from San Pasqual Valley Road (SR-78). No harmful effects upon the desirable neighborhood character were found.

- iii. The suitability of the site for the type and intensity of use or development which is proposed;

The site is suitable for the proposed type and intensity of development because properties to the south and east have been similarly developed and the infrastructure required to serve the project is existing and available. The project fronts on Idaho Avenue and will have a single entrance to the project located at the northernmost portion of the site. Each lot would be accessed via private driveways connecting to internal private roads. The applicant has provided service availability letters indicating the project can be served by the City of Escondido (water), Escondido Union School District and Escondido Union High School District, and the Escondido Fire Department. All lots have been designed so that enough usable land is available for an appropriately sized home with no request to deviate from

the required setbacks and the lots sizes are consistent with others in the area.

- iv. The harmful effect, if any, upon environmental quality and natural resources;

Consistent with the purpose and intent of the Subdivision Ordinance criteria for the design of conservation subdivisions, the proposed design would protect the site's unique biological and natural resources by consolidating development in the least environmentally sensitive portions of the site and preserving a biological open space area along the western boundary. Consolidating the development footprint in this way reduces grading and preserves natural resources present onsite from future development. The project has been reviewed according to CEQA and no significant unmitigable impacts have been identified and no other harmful environmental impacts have been identified.

2. That the total number of lots (excluding any lots reserved for open space purposes) shall not exceed the number obtained by dividing the total net area of the subdivision by the minimum lot area required by the applicable lot area designator.

The total net area of the site is approximately 9.98 acres and the minimum lot area required is 0.5 acres which yields 19.96 lots. The project proposes 20 single-family residential lots. The project is consistent with the requirements for lot area averaging in Zoning Ordinance Section 4230 and Section 4125 Computation of Minimum Number of Dwelling Units, which states "The minimum number of dwelling units required within the exterior boundary lines of any subdivision, ...or lot, expressed in acres multiplied by the applicable minimum density designator, if any. A product with any fraction of a dwelling unit shall be rounded up to the nearest whole number of dwelling units". Therefore, the total number of lots does not exceed the requirements of the applicable lot area designator.

3. That all lots and easements in the subdivision which are designated for open space be for the preservation of steep natural slopes, environmentally sensitive areas, wildlife habitat, agriculture, or archaeological or historical resources, and will be permanently reserved for open space in a manner which makes the County or a public agency a party to and entitled to enforce the reservation.

The project proposes a biological open space easement along a portion of the western boundary of the project site. This easement will be dedicated to the County of San Diego and will preserve, in perpetuity, approximately 1.43 acres of unique, sensitive biological resources onsite from future disturbance and development. Additionally, the open space easement includes a 30-foot Limited Building Zone adjacent to the open space boundary, further buffering resources from the proposed development.

- 4. That the proposed subdivision and the total number and location of the proposed lots will be consistent with the San Diego County General Plan.

The project is consistent with the development density established by the General Plan Land Use Designation, Village Residential (VR-2) which allows 2 dwelling units per gross acre. Pursuant to Table LU-2, the maximum allowable density for the site is 20.46 dwelling units. The project proposes 20 single-family residential lots, which is consistent with the density allocated by the General Plan.

Furthermore, the consolidated lot design of the project conforms with all applicable General Plan policies; in particular LU-6.1, Environmental Sustainability; LU-6.3, Conservation-Oriented Project Design; and LU-6.4, Sustainable Subdivision Design. Policy LU-6.1 requires the protection of intact or sensitive natural resources in support of the long-term sustainability of the natural environment. Policy LU-6.3 encourages support for conservation-oriented project designs through mechanisms such as, but not limited to, lot area averaging and reductions in lot size with corresponding requirements for preserved open space. Policy LU-6.4 requires that residential subdivisions be planned to conserve open space and natural resources, protect agricultural operations including grazing, increase fire safety and defensibility, reduce impervious footprints, use sustainable development practices, and, when appropriate, provide public amenities. This project includes approximately 1.43 acres of biological open space positioned away from the proposed development footprint. The project is consistent with the General Plan policies mentioned above because lot area averaging allows for the preservation of unique and sensitive resources and other natural features located on the property, allows for a reduced development footprint, and ensures the least environmentally sensitive portions of the site are developed to achieve the density envisioned in the General Plan.

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**ORDINANCE COMPLIANCE AND NOTICES:** The project is subject to, but not limited to the following County of San Diego, State of California, and US Federal Government, Ordinances, Permits, and Requirements:

**LIGHTING ORDINANCE COMPLIANCE:** In order to comply with the County Lighting Ordinance 59.101 et seq. and Zoning Ordinance Sections 6322, 6324, and 6326, the onsite lighting shall comply with the approved plot plan(s), specific permit conditions and approved building plans associated with this permit. All light fixtures shall be designed and adjusted to reflect light downward, away from any road or street, and away from adjoining premises, and shall otherwise conform to the County Lighting Ordinance 59.101 et seq. and Zoning Ordinance Sections 6322, and 6324. The property owner and permittee shall conform to the approved plot plan(s), specific permit conditions, and approved building plans associated with this permit as they pertain to lighting. No additional lighting is permitted. If the permittee or property owner chooses to change the

site design in any way, they must obtain approval from the County for a Minor Deviation or a Modification pursuant to the County of San Diego Zoning Ordinance.

**NOISE ORDINANCE COMPLIANCE:** In order to comply with the [County Noise Ordinance 36.401](#) et seq. and the Noise Standards pursuant to the General Plan Noise Element (Table N-1 & N-2), the property and all of its uses shall comply with the approved plot plans, specific permit conditions and approved building plans associated with the Escondido Estates Subdivision project, PDS2020-TM-5639. No noise generating equipment and project related noise sources shall produce noise levels in violation of the County Noise Ordinance. The property owner and permittee shall conform to the approved plot plan(s), specific permit conditions, and approved building plans associated with this permit as they pertain to noise generating devices or activities. If the permittee or property owner chooses to change the site design in any way, they must obtain approval from the County for a Minor Deviation or a Modification pursuant to the County of San Diego Zoning Ordinance.

**STORMWATER ORDINANCE COMPLIANCE:** In order to Comply with all applicable stormwater regulations the activities proposed under this application are subject to enforcement under permits from the [San Diego Regional Water Quality Control Board \(RWQCB\)](#) and the County of San Diego Watershed Protection, Stormwater Management, and Discharge Control [Ordinance No. 10410](#) and all other applicable ordinances and standards for the life of this permit. The project site shall be in compliance with all applicable stormwater regulations referenced above and all other applicable ordinances and standards. This includes compliance with the approved Stormwater Management Plan, all requirements for Low Impact Development (LID), Hydromodification, materials and wastes control, erosion control, and sediment control on the project site. Projects that involve areas 1 acre or greater require that during construction the property owner keeps the Storm Water Pollution Prevention Plan (SWPPP) onsite and update it as needed. The property owner and permittee shall comply with the requirements of the stormwater regulations referenced above.

**LOW IMPACT DEVELOPMENT NOTICE:** The San Diego Regional Water Quality Control Board (SDRWQCB) issued a new Municipal Stormwater Permit under the National Pollutant Discharge Elimination System (NPDES). The requirements of the Municipal Permit were implemented beginning in May 2013. *Project design shall be in compliance with the new Municipal Permit regulations.* The Low Impact Development (LID) Best Management Practices (BMP) Requirements of the Municipal Permit can be found at the following link:

[http://www.sandiegocounty.gov/content/dam/sdc/dpw/WATERSHED\\_PROTECTION\\_PROGRAM/susmppdf/lid\\_handbook\\_2014sm.pdf](http://www.sandiegocounty.gov/content/dam/sdc/dpw/WATERSHED_PROTECTION_PROGRAM/susmppdf/lid_handbook_2014sm.pdf)

The County has provided a LID Handbook as a source for LID information and is to be utilized by County staff and outside consultants for implementing LID in our region. See link below. <http://www.sdcounty.ca.gov/dplu/docs/LID-Handbook.pdf>

**STORMWATER COMPLIANCE NOTICE:** Updated studies, including Hydro-modification Management Plans for Priority Development Projects, will be required prior to approval of grading and improvement plans for construction pursuant to [County of San Diego Watershed Protection, Stormwater Management and Discharge Control Ordinance No. 10410](#) (N.S.), dated February 26, 2016 and BMP Design Manual. These requirements are subject to the MS4 Permit issued by the Regional Water Quality Control Board, Order No. R9-2013-0001 and any subsequent order additional studies and other action may be needed to comply with future MS4 Permits.

**DRAINAGE:** The project shall be in compliance with the County of San Diego [Flood Damage Prevention Ordinance](#) No. 10091, adopted December 8, 2010.

**GRADING PERMIT REQUIRED:** A grading permit is required prior to commencement of grading when quantities of excavation or fill results in the movement of material exceeding 200 cubic yards or eight feet (8') in vertical height of cut/fill, pursuant to [Section 87.201 of Grading Ordinance](#).

**CONSTRUCTION PERMIT REQUIRED:** A Construction Permit and/or Encroachment Permit are required for any and all work within the County road right-of-way. Contact PDS Construction/Road right-of-way Permits Services Section, (858) 694-3275, to coordinate County requirements. In addition, before trimming, removing or planting trees or shrubs in the County Road right-of-way, the applicant must first obtain a permit to remove plant or trim shrubs or trees from the Permit Services Section.

**PARK LAND DEDICATION ORDINANCE COMPLIANCE:** The PDS2020-TM-5639 project residential subdivision is subject to the County of San Diego Park Land Dedication Ordinance (PLDO) pursuant to Section 810.101 et. seq. The PLDO fee shall be paid and a note placed on the final map. PLDO fees shall be collected on a per lot or dwelling unit basis prior to the issuance of a building permit for each lot or dwelling unit, or such other permit as may be required to authorize the construction of a dwelling. The fee is calculated pursuant to the ordinance at the time of building permit issuance. The applicant shall pay the PLDO fee at the [PDS, LD Counter].

**TRANSPORTATION IMPACT FEE:** The PDS2020-TM-5639 project is subject to County of San Diego Transportation Impact Fee (TIF) pursuant to [County TIF Ordinance number 77.201 – 77.223](#). The Transportation Impact Fee (TIF) shall be paid. The fee is required for the entire project, or it can be paid at building permit issuance for each phase of the project. The fee is calculated pursuant to the ordinance at the time of building permit issuance. The applicant shall pay the TIF at the [PDS, LD Counter] and provide a copy of the receipt to the [PDS, BD] at time of permit issuance.

**NOTICE:** The subject property contains habitat which may be used for nesting by migratory birds. Any grading, brushing or clearing conducted during the migratory bird breeding season, February 1 – August 31, has a potential to impact nesting or breeding birds in violation of the Migratory Bird Treaty Act. The applicant may submit evidence that nesting or breeding migratory birds will not be affected by the grading, brushing or clearing

to these agencies: California Department of Fish and Wildlife, 3883 Ruffin Rd., San Diego, CA 92123, (858) 467-4201, <http://www.dfg.ca.gov/>; and United States Fish and Wildlife Service, 2177 Salk Avenue, Suite 250, Carlsbad, California 92008, (760) 431-9440, <http://www.fws.gov/>.

**NOTICE:** THE ISSUANCE OF THIS PERMIT BY THE COUNTY OF SAN DIEGO DOES NOT AUTHORIZE THE APPLICANT FOR SAID PERMIT TO VIOLATE ANY FEDERAL, STATE, OR COUNTY LAWS, ORDINANCES, REGULATIONS, OR POLICIES INCLUDING, BUT NOT LIMITED TO, THE FEDERAL ENDANGERED SPECIES ACT AND ANY AMENDMENTS THERETO.

<b>EXPLANATION OF COUNTY DEPARTMENT AND DIVISION ACRONYMS</b>			
<b>Planning &amp; Development Services (PDS)</b>			
Project Planning Division	PPD	Land Development Project Review Teams	LDR
Permit Compliance Coordinator	PCC	Project Manager	PM
Building Plan Process Review	BPPR	Plan Checker	PC
Building Division	BD	Map Checker	MC
Building Inspector	BI	Landscape Architect	LA
Zoning Counter	ZO		
<b>Department of Public Works (DPW)</b>			
Private Development Construction Inspection	PDCI	Environmental Services Unit Division	ESU
<b>Department of Environmental Health (DEH)</b>			
Land and Water Quality Division	LWQ	Local Enforcement Agency	LEA
Vector Control	VCT	Hazmat Division	HMD
<b>Department of Parks and Recreation (DPR)</b>			
Trails Coordinator	TC	Group Program Manager	GPM
Parks Planner	PP		
<b>Department of General Service (DGS)</b>			
Real Property Division	RP		

**APPEAL PROCEDURE:** Within ten calendar days after the date of this Decision of the Director, the decision may be appealed to the Board of Supervisors in accordance with [Section 7166 of the County Zoning Ordinance](#). An appeal shall be filed with the Secretary of the Board of Supervisors within TEN CALENDAR DAYS of the date of this notice AND MUST BE ACCOMPANIED BY THE DEPOSIT OR FEE AS PRESCRIBED IN THE DEPARTMENT'S FEE SCHEDULE, PDS FORM #369, pursuant to Section 362 of the San Diego County Administrative Code. If the tenth day falls on a weekend or County

holiday, an appeal will be accepted until 4:00 p.m. on the following day the County is open for business. Filing of an appeal will stay the decision of the Director until a hearing on your application is held and action is taken by the Planning Commission. Furthermore, the 90-day period in which the applicant may file a protest of the fees, dedications or exactions begins on the date of approval of this Decision.

ON MOTION of Commissioner \_\_\_\_\_, seconded by Commissioner \_\_\_\_\_, this Resolution is passed and approved by the Board of Supervisors of the County of San Diego, State of California, at a regular meeting held on this 22<sup>nd</sup> day of July 2022, in COC Campus Center Chambers, 5520 Overland Avenue, San Diego, California, by the following vote:

AYES:

NOES:

ABSENT:

Approved as to Form and Legality  
County Counsel

By: \_\_\_\_\_

Randall Sjoblom, Senior Deputy  
County Counsel



**Attachment C – Resolution  
Approving PDS2020-TM-5639**

July 22, 2022

RESOLUTION OF SAN DIEGO COUNTY)  
PLANNING COMMISSION )  
CONDITIONALLY APPROVING )  
TENTATIVE MAP NO. 5639 )

WHEREAS, Tentative Map No. 5639 proposing the division of property located southeast of the intersection of Idaho Avenue and San Pasqual Valley Road, and generally described as:

PARCEL B OF CERTIFICATE OF COMPLIANCE RECORDED NOVEMBER 1, 2002 AS FILE NO. 2002-97379 OF OFFICIAL RECORDS AND DESCRIBED AS FOLLOWS:

ALL THAT PORTION OF LOT 9 IN BLOCK 321, IN THE COUNTY OF SAN DIEGO, STATE OF CALIFORNIA, OF RANCHO RINCON DEL DIABLO RESURVEY ACCORDING TO MAP THEREOF NO. 725, FILED IN THE OFFICE OF THE COUNTY RECORDER OF SAID SAN DIEGO COUNTY AUGUST 13, 1892.

was filed with the County of San Diego pursuant to the Subdivision Map Act and San Diego County Subdivision Ordinance on May 14, 2020; and

WHEREAS, on October 29, 2021, the Planning Commission of the County of San Diego pursuant to [Section 81.306 of the San Diego County Subdivision Ordinance](#) held a duly advertised public hearing on said Tentative Map and received for its consideration, documentation, written and oral testimony, recommendations from all affected public agencies, and heard from all interested parties present at said hearing; and

WHEREAS, the Planning Commission of the County of San Diego has determined that the conditions hereinafter enumerated are necessary to ensure that the subdivision and the improvement thereof will comply with the Subdivision Map Act and conform to all ordinances, plans, rules, standards, and improvement and design requirements of San Diego County.

IT IS RESOLVED, DETERMINED, AND ORDERED, that based on the findings, said Tentative Map is hereby approved subject to the following conditions:

**MAP EXPIRATION:** The approval of this Tentative Map shall become effective 30 days after the adoption of this Resolution. This approval Expires Thirty-Six (36) Months from said effective date at 4:00 P.M. Unless, prior to that date, an application for a Time Extension has been filed as provided by [Section 81.313 of the County Subdivision Ordinance](#).

**WAIVERS AND EXCEPTIONS:** This permit is hereby approved pursuant to the provisions of the County Public and Private Road Standards, and all other required ordinances of San Diego County except for a waiver or modification of the County Public and Private Road Standards requirements to permit:

1. DER1: Idaho Avenue is classified as a 2.2D Light Collector from Escondido City Limits to Bear Valley Parkway under the General Plan Mobility Element Network (MEN). The Public Road Standards Table 2A requires a minimum Right-of-Way (ROW) width of eighty-eight feet (88'). The Department of Public Works approved a DER to reduce the ROW width to seventy-six feet (76') as an interim condition on August 27, 2021.
2. DER 2 Idaho Avenue is classified as a 2.2D Light Collector with unspecified improvements from Escondido City Limits to Bear Valley Parkway under the General Plan Mobility Element Network (MEN). The Public Road Standards Table 2A requires a minimum improvement width of fifty-four feet (54'). The Department of Public Works approved a DER to reduce the. a median/left turn lane to ten feet (10') and a shoulder width to two feet (2') and improvement width to forty-four feet (44') as an interim condition on August 27, 2021.

**STANDARD CONDITIONS:** The "[Standard Conditions \(1-29\) for Tentative Subdivision Maps](#)" approved by the Board of Supervisors on June 16, 2000, and filed with the Clerk, as Document No. 740858(a) (Attached Herein as Exhibit A), shall be made conditions of this Tentative Map approval. Only the following exceptions to the Standard Conditions set forth in this Resolution or shown on the Tentative Map will be authorized. **The following Standard Subdivision Conditions are hereby waived:**

- (1) Standard Condition 10.a: Said condition states that all fixtures shall use a low pressure sodium (LPS) vapor light source. This waiver/modification allows the use of LED light fixtures per County of San Diego Street Lighting Specifications dated April 2019.
- (2) Standard Condition 11: Said condition pertains to condominium units or a planned development. This subdivision is neither a condominium nor a planned development.
- (3) Standard Condition 21: Said conditions apply to a public sewer system. The project proposes to a septic sewer system.
- (4) Standard Condition 27.1: Said condition states that the Final Map may be filed as units or groups of units. The Final Map for this project is required to include the entire area shown on the Tentative Map and shall not be filed as units or groups of units.

**PRELIMINARY GRADING PLAN:** The approval of this Tentative Map hereby adopts the Preliminary Grading and Improvement Plan dated January 7, 2020 consisting of four

sheets pursuant to [Section 81.305 of the County Subdivision Ordinance](#). In accordance with the [Section 87.207 of the County Grading Ordinance](#), Environmental Mitigation Measures or other conditions of approval required and identified on this plan, shall be completed or implemented on the final engineering plan before any improvement or grading plan can be approved and any permit issued in reliance of the approved plan. Any Substantial deviation therefrom the Preliminary Grading and Improvement Plan may cause the need for further environmental review. Additionally, approval of the preliminary plan does not constitute approval of a final engineering plan. A final engineering plan shall be approved pursuant to [County of San Diego Grading Ordinance \(Sec 87.701 et. al.\)](#)

**APPROVAL OF MAP:** *The following specific conditions shall be complied with before a Final Map is approved by the Planning Commission and filed with the County Recorder of San Diego County (and, where specifically, indicated, shall also be complied with prior to approval of any plans, and issuance of any grading or other permits as specified):*

**30. GEN#1 - COST RECOVERY**

**INTENT:** In order to comply with [Section 362 of Article XX of the San Diego County Administrative Code](#), Schedule B.5 existing deficit accounts associated with processing this map shall be paid. **DESCRIPTION OF REQUIREMENT:** The applicant shall pay off all existing deficits associated with processing this map. **DOCUMENTATION:** The applicant shall provide evidence to *[PDS, Zoning Counter]*, which shows that all fees and trust account deficits have been paid. No map can be issued if there are deficit accounts. **TIMING:** Prior to the approval of any map and prior to the approval of any plan and issuance of any permit, all fees and trust account deficits shall be paid. **MONITORING:** The *[PDS Zoning Counter]* shall review the evidence to verify compliance with this condition.

**31. GEN#2—FILING OF NOTICE OF EXEMPTION (NOE):**

**INTENT:** In order to comply with CEQA and State law, the permit NOE shall be filed at the County Recorder's Office. **DESCRIPTION OF REQUIREMENT:** The applicant shall take the original NOE and required fees to the San Diego County Recorder's Office and file the document within five (5) days of permit approval and return a copy of the filed document to PDS. **DOCUMENTATION:** The filed NOE form. **TIMING:** Within the first five (5) days of the appeal period, the applicant/owner shall take the original NOE form and required filing fees to the San Diego County Recorder's Office and file the document. **MONITORING:** The PDS Zoning Counter shall verify that the NOE was filed and that a copy of the document is on file at PDS.

**32. GEN#3—GRADING PLAN CONFORMANCE**

**INTENT:** In order to implement the required mitigation measures for the project, the required grading plan and improvement plans shall conform to the approved Conceptual Grading and Development Plan. **DESCRIPTION OF REQUIREMENT:** The grading and/or improvement plans shall conform to the approved Conceptual Grading Plan, which includes all of the following mitigation measures: Air Quality

(Fugitive Dust, Construction Exhaust Emissions); Biological Resources (Resource Avoidance, Off-Site Mitigation); Cultural Resources (Archaeological Monitoring); Fire (Fire Requirements); Noise (Temporary Construction Noise, Noise Restriction Easement). **DOCUMENTATION:** The applicant shall submit the grading plans and improvement plans, which conform to the conceptual development plan for the project. **TIMING:** Prior to the recordation of the Final Map and prior to the approval of any plan and issuance of any permit, the notes and items shall be placed on the plans as required. **MONITORING:** The [DPW, ESU, or PDS, BD for PDS Minor Grading, DPR, TC for trails and PP for park improvements] shall verify that the grading and/or improvement plan requirements have been implemented on the final grading and/or improvement plans as applicable. The environmental mitigation notes shall be made conditions of the issuance of said grading or construction permit.

### 33. **DEH#1–SEPTIC REVIEW**

**INTENT:** In order to ensure that the proposed Onsite Wastewater Treatment Systems (OWTS) for each future home are adequate and comply with the County Regulatory Code Section 68.311, the Final Map shall be reviewed by the Department of Environmental Health (DEH). This is to ensure the lot design, location, lot numbers, grading are consistent with the approved Tentative Map and Preliminary Grading Plan. **DESCRIPTION OF REQUIREMENT:** The Final Map shall be reviewed by the Department of Environmental Health for consistency regarding the individual OWTS [DEH, LWQ]. **DOCUMENTATION:** The applicant shall provide PDS a letter from DEH stating that the Maps/Plans have been reviewed for septic purposes and have received approval. **TIMING:** Prior to the approval of the Final Map, and prior to the approval of any plan, issuance of any permit, the applicant shall have the septic system reviewed. **MONITORING:** The [PDS, PCC] shall review the documents provided for the satisfaction of this condition.

### 34. **DEH#2–SEPTIC APPROVAL**

**INTENT:** In order to ensure that the Onsite Wastewater Treatment Systems (OWTS) installed for each future home are adequate and comply with the County Regulatory Code Section 68.311, the following conditions must be enforced.

#### **DESCRIPTION OF REQUIREMENT:**

- a. Each dwelling constructed within this subdivision shall be connected to an appropriately sized septic tank and/or Supplemental Treatment System (STS) approved for use (NSF Standard 40) within the County of San Diego.
- b. The system shall have demonstrated the minimum required total nitrogen reduction of  $\geq 67\%$ , as specified in the Nitrogen Mass Balance Study for the Proposed Escondido Estates, December 2020 (Dudek) calculations. The percent reduction shall be taken directly from the either the NSF 40 or NSF 245 testing results provided to the manufacturer by the National Sanitation Foundation as part of their testing results.

The application rate applied to the drip dispersal system areas for each lot is 0.533gallons/day/ft<sup>2</sup>(30MPI). The following is a list of the supplemental treatment system sizing for each lot:

- Lots 1-6, 9-14, & 16-20: Proposed 4-bedroom SFD with  $\geq 2252\text{ft}^2$  of total drip dispersal area shown (1126ft<sup>2</sup> Primary/1126ft<sup>2</sup> Reserve).
  - Lots 6-8, & 15: Proposed 5-bedroom SFD with  $\geq 2814\text{ft}^2$  of total drip dispersal area shown (1407ft<sup>2</sup> Primary/1407ft<sup>2</sup> Reserve).
- c. The proposed drip irrigation areas are to be undisturbed during grading and improvement activities. This may require these areas to be fenced off to limit disturbance or compaction. It is strongly recommended that the design professional (Malcolm Vinje) be consulted prior to any grading or clearing activities. Disturbance of the proposed drip irrigation areas could result in decreases in usable area which could result in decreased bedroom counts for the proposed lots.
- d. All STS require an annual operating permit, issued by DEHQ. The annual operating permit will define the monitoring and maintenance requirements as specified by the manufacturer and/or qualified professional who designed the system.
- e. An operation and maintenance manual shall be provided by the manufacturer or qualified professional that includes the qualified professionals name, address, telephone number, and business and professional license number. A copy shall be maintained at the site and shall be available to the qualified service provider.
- f. All STS must be maintained by a qualified service provider and a maintenance contract must be kept in place throughout the life of the STS.
- g. All STS require, at a minimum, biannual inspections by the qualified service provider to ensure proper operation and maintenance of the system. Copies of the inspection results shall be provided to the DEHQ within 30 days of the inspection being completed.
- h. Each drip dispersal system shall be flushed once every three months for the first year or until vegetation is established, whichever occurs first. Flushing shall occur every six months thereafter.
- i. The drip dispersal systems shall be planted with appropriate vegetation to allow for uptake of nutrients from the wastewater.

- j. All failures, malfunctions, service requests, alarms, or other instances where an STS requires the attention of a qualified service provider shall be reported to DEHQ within 72 hours of the incident occurring.
- k. Failure to maintain an annual operating permit or provide the biannual inspection results to DEHQ will result in enforcement action and may result in condemnation of the structure.
- l. Any supplemental treatment system proposed for use must demonstrate that the system has achieved or exceeded 67% Nitrate reduction as part of the National Sanitation Foundation's Standard 40 or Standard 245 certification testing.

**DOCUMENTATION:** The applicant shall provide PDS a letter from DEH stating that the Maps/Plans have been reviewed for septic purposes and have received approval. **TIMING:** Prior to the approval of the Final Map, and prior to the approval of any plan, issuance of any permit, the applicant shall have the septic system reviewed. **MONITORING:** The [PDS, PCC] shall review the documents provided for the satisfaction of this condition.

### 35. **CULT#1 - ARCHAEOLOGICAL AND TRIBAL MONITORING**

**INTENT:** In order to mitigate for potential impacts to undiscovered buried archaeological resources and human remains, an Archaeological Monitoring Program and potential Data Recovery Program shall be implemented pursuant to the County of San Diego Guidelines for Determining Significance for Cultural Resources and the California Environmental Quality Act (CEQA). **DESCRIPTION OF REQUIREMENT:** A County Approved Principal Investigator (PI) known as the "Project Archaeologist," shall be contracted to perform archaeological monitoring and a potential data recovery program during all grading, clearing, grubbing, trenching, and construction activities. The archaeological monitoring program shall include the following:

- a. The Project Archaeologist shall perform the monitoring duties before, during and after construction pursuant to the most current version of the County of San Diego Guidelines for Determining Significance and Report Format and Requirements for Cultural Resources. The Project Archaeologist and Luiseno and/or Kumeyaay Native American monitor (number of monitors to be determined during preparation of Treatment Agreement and Preservation Plan) shall also evaluate fill soils to determine that they are clean of cultural resources. The contract or letter of acceptance provided to the County shall include an agreement that the archaeological monitoring will be completed, and a Memorandum of Understanding (MOU) between the Project Archaeologist and the County of San Diego shall be executed. The contract or letter of acceptance shall include a cost estimate for the monitoring work and reporting.

- b. The Project Archeologist shall provide evidence that a Luiseno and/or Kumeyaay Native American (number of monitors to be determined during preparation of Treatment Agreement and Preservation Plan) has been contracted by the property owner or their representative to perform Native American Monitoring for the project.
- c. The cost of the monitoring shall be added to the grading bonds or bonded separately.

**DOCUMENTATION:** The applicant shall provide a copy of the Archaeological Monitoring Contract or letter of acceptance, copy of Tribal monitoring contract, cost estimate, and MOU to [PDS, PPD]. Additionally, the cost amount of the monitoring work shall be added to the grading bond cost estimate. **TIMING:** Prior to approval of any grading and or improvement plans and issuance of any Grading or Construction Permits. **MONITORING:** [PDS, PPD] shall review the contract or letter of acceptance, MOU and cost estimate or separate bonds for compliance with this condition. The cost estimate should be forwarded to [PDS, PPD] for inclusion in the grading bond cost estimate, and grading bonds and the grading monitoring requirement shall be made a condition of the issuance of the grading or construction permit.

### 36. **CULT#2 - CULTURAL RESOURCES TREATMENT AGREEMENT AND PRESERVATION PLAN**

**INTENT:** In order to mitigate for impacts to potential cultural resources, develop and enter into a Cultural Resources Treatment Agreement and Preservation Plan with culturally-affiliated Tribes. **DESCRIPTION OF REQUIREMENT:** A single Cultural Resources Treatment Agreement and Preservation Plan shall be developed between the applicant or their representative, the County of San Diego, and culturally-affiliated Tribes. The Cultural Resources Treatment Agreement and Preservation Plan shall be reviewed and agreed to by the County prior to final signature and authorization. The Cultural Resources Treatment Agreement and Preservation Plan shall include but is not limited to the following:

- a. Parties entering into the agreement and contact information.
- b. Number of monitors required for the monitoring program and whether both Luiseno and Kumeyaay monitors are required.
- c. Notification to all parties including Luiseno and Kumeyaay tribes should resources be identified during monitoring.
- d. Responsibilities of the Property Owner or their representative, Principal Investigator, archaeological monitors, Luiseno and/or Kumeyaay Native American monitors, and consulting tribes.



- e. Requirements of the Archaeological Monitoring Program including unanticipated discoveries. The requirements shall address grading and grubbing requirements including controlled grading and controlled vegetation removal in areas of cultural sensitivity, and analysis of identified cultural materials.
- f. Excavated soils. If soil quantities (54,705 cy cut; 70,906 cy fill; 16,201 cy import) change, consultation with the culturally-affiliated tribes shall occur.
- g. Treatment of identified Native American cultural materials. Any identified Native American cultural materials with the exception of Native American human remains and associated grave goods (described in item g below) are to be reburied onsite.
- h. Deed restriction. Details of the requirement for a deed restriction for reburial of identified Native American cultural materials. The requirements shall address protection of Native American cultural materials, access, and responsibilities for management and maintenance of the open space.
- i. Treatment of Native American human remains and associated grave goods.
- j. Confidentiality of cultural information including location and data.
- k. Negotiation of disagreements should they arise during the implementation of the Agreement and Preservation Plan.
- l. Regulations that apply to cultural resources that have been identified or may be identified during project construction.

**DOCUMENTATION:** A copy of the implemented agreement shall be submitted to the [PDS, PPD] for approval. **TIMING:** Prior to any clearing, grubbing, trenching, grading, or any land disturbances. **MONITORING:** The [PDS, PPD] shall review the implemented agreement for compliance this condition.

**37. BIO#1–BIOLOGICAL EASEMENT [PDS, FEE X 2]**

**INTENT:** In order to protect sensitive biological resources, pursuant to the County's Guidelines for Determining Significance for Biological Resources, a biological open space easement shall be granted. **DESCRIPTION OF REQUIREMENT:** Grant to the County of San Diego an open space easement, as shown on the approved Tentative Map. This easement is for the protection of biological resources and prohibits all of the following on any portion of the land subject to said easement: grading; excavation; placement of soil, sand, rock, gravel, or other material; clearing of vegetation; construction, erection, or

placement of any building or structure; vehicular activities; trash dumping; or use for any purpose other than as open space. Granting of this open space authorizes the County and its agents to periodically access the land to perform management and monitoring activities for the purposes of species and habitat conservation. The only exception(s) to this prohibition are:

1. Selective clearing of vegetation by hand to the extent required by written order of the fire authorities for the express purpose of reducing an identified fire hazard. While clearing for fire management is not anticipated with the creation of this easement, such clearing may be deemed necessary in the future for the safety of lives and property. All fire clearing shall be pursuant to the applicable fire code of the Fire Authority Having Jurisdiction and the Memorandum of Understanding dated February 26, 1997, between the wildlife agencies and the fire districts and any subsequent amendments thereto.
2. Activities conducted pursuant to a revegetation or habitat management plan approved by the Director of PDS, DPR and DPW.
3. Vegetation removal or application of chemicals for vector control purposes where expressly required by written order of the County of San Diego DEH.

**DOCUMENTATION:** The applicant shall show the easement on the Final Map with the appropriate granting language on the title sheet concurrent with Final Map Review – OR– The applicant shall prepare the draft plats and legal descriptions of the easements, then submit them for preparation and recordation with the *[DGS, RP]*, and pay all applicable fees associated with preparation of the documents.

**TIMING:** Prior to the approval of the map, or on the map, and prior to the approval of any plan and issuance of any permit, the easements shall be executed and recorded. **MONITORING:** For recordation on the map, *[PDS, LDR]* shall route the Final Map to *[PDS, PCC]* for approval prior to map recordation –OR– for recordation by separate document, the *[DGS, RP]* shall prepare and approve the easement documents and send them to *[PDS, PCC]* and *[DPR GPM]* for preapproval. The *[PDS, PCC]* shall preapprove the language and estimated location of the easements prior to recordation. Upon Recordation of the easements *[DGS, RP]* shall forward a copy of the recorded documents to *[PDS, PCC]* for satisfaction of the condition –OR– if recorded on the map, the *[PDS LDR]* shall satisfy the condition after map recordation.

**38. BIO#2–LBZ EASEMENT [PDS, FEEX 2]**

**INTENT:** In order to protect sensitive biological resources, pursuant to the County’s Guidelines for Determining Significance for Biological Resources, a Limited Building Zone (LBZ) Easement shall be granted to limit the need to clear or modify vegetation for fire protection purposes within an adjacent biological resource area. **DESCRIPTION OF REQUIREMENT:** Grant to the County of San Diego a LBZ Easement as shown on the Tentative Map. The purpose of this easement is to limit the need to clear or modify vegetation for fire protection

purposes within the adjacent biological open space easement and prohibit the construction or placement of any structure designed or intended for occupancy by humans or animals. The only exceptions to this prohibition are:

1. Decking, fences, and similar facilities.
2. Sheds, gazebos, and detached garages, less than 250 square feet in total floor area, that are designed, constructed and placed so that they do not require clearing or fuel modification within the biological open space easement, beyond the clearing/fuel modification required for the primary structures on the property.

**DOCUMENTATION:** The applicant shall show the easement on the Final Map with the appropriate granting language on the title sheet concurrent with Final Map Review – OR– The applicant shall prepare the draft plats and legal descriptions of the easements, then submit them for preparation and recordation with the [DGS, RP], and pay all applicable fees associated with preparation of the documents.

**TIMING:** Prior to the approval of the map, or on the map and prior to the approval of any plan and issuance of any permit, the easements shall be recorded.

**MONITORING:** For recordation on the map, the [PDS, LDR] shall route the Final Map to [PDS, PCC] for approval prior to map recordation –OR– for recordation by separate document, the [DGS, RP] shall prepare and approve the easement documents and send them to [PDS, PCC] and [DPR GPM] for preapproval. The [PDS, PCC] shall preapprove the language and estimated location of the easements prior to recordation. Upon Recordation of the easements [DGS, RP] shall forward a copy of the recorded documents to [PDS, PCC] for satisfaction of the condition –OR– if recorded on the map, the [PDS LDR] shall satisfy the condition after map recordation.

### 39. **BIO#3–OFFSITE MITIGATION [PDS, FEE X2]**

**INTENT:** In order to mitigate for the impacts to non-native grassland, which is a sensitive biological resource pursuant to the County’s Guidelines for Determining Significance for Biological Resources, offsite mitigation shall be acquired.

**DESCRIPTION OF REQUIREMENT:** The applicant shall purchase habitat credit or provide for the conservation of habitat of 4.6 acres of non-native grassland, located within a County approved mitigation bank as indicated below.

- a. **Option 1:** If purchasing Mitigation Credit the mitigation bank shall be approved by the California Department of Fish and Wildlife. The following evidence of purchase shall include the following information to be provided by the mitigation bank:
  1. A copy of the purchase contract referencing the project name and numbers for which the habitat credits were purchased.
  2. If not stated explicitly in the purchase contract, a separate letter must be provided identifying the entity responsible for the long-term management and monitoring of the preserved land.

3. To ensure the land will be protected in perpetuity, evidence must be provided that a dedicated conservation easement or similar land constraint has been placed over the mitigation land.
  4. An accounting of the status of the mitigation bank. This shall include the total amount of credits available at the bank, the amount required by this project and the amount remaining after utilization by this project.
- b. **Option 2:** If habitat credit cannot be purchased in a mitigation bank, then the applicant shall provide for the conservation of habitat of the same amount and type of land located in North San Diego County as indicated below:
1. The type of habitat and the location of the proposed mitigation, should be pre-approved by [PDS, PCC] before purchase or entering into any agreement for purchase.
  2. A Resource Management Plan (RMP) shall be prepared and approved pursuant to the County of San Diego Biological Report Format and Content Requirements to the satisfaction of the Director of PDS. If the offsite mitigation is proposed to be owned and/or managed by DPR, the RMP shall also be approved by the Director of DPR.
  3. An open space easement over the land shall be dedicated to the County of San Diego or like agency to the satisfaction of the Director of PDS. The land shall be protected in perpetuity.
  4. The final RMP cannot be approved until the following has been completed to the satisfaction of the Director of PDS: The land shall be purchased, the easements shall be dedicated, a Resource Manager shall be selected, and the RMP funding mechanism shall be in place.
  5. In lieu of providing a private habitat manager, the applicant may contract with a federal, state or local government agency with the primary mission of resource management to take fee title and manage the mitigation land. Evidence of satisfaction must include a copy of the contract with the agency, and a written statement from the agency that (1) the land contains the specified acreage and the specified habitat, or like functioning habitat, and (2) the land will be managed by the agency for conservation of natural resources in perpetuity.

**DOCUMENTATION:** The applicant shall purchase the offsite mitigation credits and provide the evidence to the [PDS, PCC] for review and approval. If the offsite mitigation is proposed to be owned or managed by DPR, the applicant must

provide evidence to the [PDS PCC] that [DPR, GPM] agrees to this proposal. It is recommended that the applicant submit the mitigation proposal to the [PDS, PCC], for a pre-approval. If an RMP is submitted in-lieu of purchasing credits (option 1), then the RMP shall be prepared and an application for the RMP shall be submitted to the [PDS, ZONING]. **TIMING:** Prior to the approval of the map and prior to the approval of any plan and issuance of any permit, the mitigation shall be completed. **MONITORING:** The [PDS, PCC] shall review the mitigation purchase for compliance with this condition. Upon request from the applicant [PDS, PCC] can preapprove the location and type of mitigation only. The credits shall be purchased before the requirement can be completed. If the applicant chooses option #2, then the [PDS, ZONING] shall accept an application for an RMP, and [PDS, PPD] shall review the RMP submittal for compliance with this condition and the RMP Guidelines.

**40. BIO#4–OPEN SPACE SIGNAGE [PDS, FEE]**

**INTENT:** In order to protect the proposed open space easement from entry, informational signs shall be installed. **DESCRIPTION OF REQUIREMENT:** Open space signs shall be placed along the biological open space boundary as indicated on the approved Tentative Map. The signs must be corrosion resistant, a minimum of 6" x 9" in size, on posts not less than three (3) feet in height from the ground surface, and must state the following:

**Sensitive Environmental Resources  
Area Restricted by Easement**

Entry without express written permission from the County of San Diego is prohibited. To report a violation or for more information about easement restrictions and exceptions contact the County of San Diego,  
Planning & Development Services  
Reference: PDS2020-TM-5639

**DOCUMENTATION:** The applicant shall install the signs as indicated above and provide site photos and a statement from a California Registered Engineer, or licensed surveyor, that the open space signs have been installed at the boundary of the open space easement(s). **TIMING:** Prior to the approval of the map and prior to the approval of any plan and issuance of any permit, the open space signs shall be installed. **MONITORING:** The [PDS, PCC] shall review the photos and statement for compliance with this condition.

**41. BIO#5–OPEN SPACE FENCING [PDS, FEE]**

**INTENT:** In order to protect the proposed open space easement from entry, and disturbance, permanent fencing or walls shall be installed. **DESCRIPTION OF REQUIREMENT:** Open space fencing or walls shall be placed along the biological open space boundary as indicated on the Tentative Map. The fencing/walls design shall consist of three strand non-barbed wire or split rail fencing. **DOCUMENTATION:** The applicant shall install the fencing or walls as indicated above and provide site photos and a statement from a California Registered Engineer, or licensed surveyor that the open space fencing has been installed.

**TIMING:** Prior to the approval of the map and prior to the approval of any plan and issuance of any permit, the fencing or walls shall be placed. **MONITORING:** The [PDS, PCC] shall review the photos and statement for compliance with this condition.

**42. BIO#6–WETLAND PERMITS: [PDS, FEE X2]**

**INTENT:** In order to comply with the State and Federal Regulations for jurisdictional waters, the following agency permits, or verification that they are not required shall be obtained. **DESCRIPTION OF REQUIREMENT:** The following permit and agreement shall be obtained, or provide evidence from the respective resource agency satisfactory to the Director of PDS that such an agreement or permit is not required:

- a. A Clean Water Act, Section 401/404 permit issued by the California Regional Water Quality Control Board and the U.S. Army Corps of Engineers for all project related disturbances of waters of the U.S. and/or associated wetlands.
- b. A Section 1602 Streambed Alteration Agreement issued by the California Department of Fish and Wildlife for all project related disturbances of any streambed.

**DOCUMENTATION:** The applicant shall consult each agency to determine if a permit or agreement is required. Upon completion of the agency review of this project, the applicant shall provide a copy of the permit(s)/agreement(s), or evidence from each agency that such an agreement or permit is not required to the [PDS, PCC] for compliance. **TIMING:** Prior to the approval of the map and prior to the approval of any plan and issuance of any permit, the permits shall be obtained. **MONITORING:** The [PDS, PCC] shall review the permits/agreement for compliance with this condition. Copies of these permits should be transmitted to the [DPW, ESU], for implementation on the grading plans.

**43. NOISE#1–NOISE RESTRICTION EASEMENT [PDS, FEE X 1]**

**INTENT:** In order to reduce the exposure to noise levels in excess of standards established by the [County of San Diego General Plan Noise Element \(Table N-1 & N-2\)](#), and the [County of San Diego CEQA Noise Guidelines for Determining Significance](#), a noise restriction easement shall be placed on all proposed 20 Lots, in order to reduce the noise exposure of land uses for the on-site sensitive receptors below levels of significance. **DESCRIPTION OF REQUIREMENT:** A Noise Restriction Easement as indicated on the approved TM-5639, shall be indicated on the map. The said easement shall include and shall comply with the following:

- a. Prior to the approval of any Building Plan and issuance of any Building Permit, a County Approved Acoustical Consultant, shall perform an acoustical analysis, which demonstrates that any proposed two-story residential dwelling unit(s) will not be exposed to present and anticipated future noise levels exceeding the allowable sound level limit of the General

Plan community noise equivalent levels (CNEL) of 45 dB for interior noise pursuant to the General Plan Noise Element. Please note that this assessment is only for proposed second floor habitable residential structures. The acoustical analysis shall demonstrate that the proposed noise sensitive land use as defined by the General Plan, will not be exposed to present and anticipated future noise levels exceeding the allowable sound level limit of the General Plan community noise equivalent levels (CNEL) of 45 dBA for interior noise, and a (CNEL) of 60 dBA for exterior noise levels (or 65 dB for exterior multi-family). Exterior noise sensitive land uses include all Group or [Private Usable Open Space as defined by the General Plan Noise Element \(Table N-1 & N-2\)](#).

- b. Prior to the approval of any Building Plan and issuance of any Building Permit, the applicant shall prepare the acoustic analysis and incorporate the proposed project design recommendations and mitigation measures, into the Building Plans. The applicant shall submit the acoustical analysis along with the building plans to the [PDS, BD] for review and approval before the building permits can be issued. To the satisfaction of the [PDS, PCC], the applicant shall revise the building plans or site design to incorporate any additional proposed mitigation measures.
- c. The acoustical analysis shall make recommendations that shall be implemented in the project design and building plans, so the proposed structures and project site can comply with the noise standards referenced above. Please refer to the Acoustical Analysis Report prepared by Ldn Consulting, Inc. and dated June 4, 2021.
- d. The unauthorized removal of documented noise control measures at a future date after the initial condition is satisfied shall make the affected noise sensitive land use still subject to this building restriction for protection of these uses before any future building permits can be approved and issued.

**DOCUMENTATION:** The applicant shall show the easement on the Parcel map with the appropriate language on the title sheet concurrent with Parcel Map Review. **TIMING:** Prior to the approval of the map for the following lots: 1 through 20, the requirements of this condition shall be completed. **MONITORING:** The [PDS, LDR] shall verify that the easement is indicated on the map as specified.

#### 44. ROADS#1–PUBLIC ROAD IMPROVEMENTS

**INTENT:** In order to promote orderly development and to comply with the [Subdivision Ordinance Sec. 81.404](#) and the Community Trails Master Plan, **Idaho Avenue** shall be improved. **DESCRIPTION OF REQUIREMENT:**

- a. Improve or agree to improve and provide security for the construction of **Idaho Avenue** along the project frontage in accordance with the Public Road Standards for a 2.2D Light Collector Road with Improvement Options,

to a one-half graded width of forty-three feet (43') from ultimate centerline with twenty-seven feet (27') transitioning to twenty feet (20') of asphalt concrete pavement over approved base, with asphalt concrete pavement over approved base with Portland cement concrete curb, gutter and sidewalk, with face of curb at twenty-seven feet (27') transitioning to twenty feet (20') from centerline. Provide one (1) twelve foot (12') wide east bound travel lane with one (1) eight foot (8') wide shoulder, one (1) ten foot (10') wide left-turn lane at the project entrance and SR-78, and one (1) twelve foot (12') lane plus two foot (2') wide shoulder in the westbound direction. Provide appropriate transitions between the left-turn lane (54' section) and the 40 foot section with a double yellow center line; provide transition for all widenings, tapers, and traffic striping to match existing pavement. All of the above shall be to the satisfaction of the Director of Public Works/Planning and Development Services (PDS).

- b. Asphalt concrete surfacing material shall be hand-raked and compacted to form smooth tapered connections along all edges including those edges adjacent to soil. The edges of asphalt concrete shall be hand-raked at 45 degrees or flatter, so as to provide a smooth transition next to existing soil, including those areas scheduled for shoulder backing. The above shall be done to the satisfaction of the Director of Public Works/PDS.

All plans and improvements shall be completed pursuant to the [County of San Diego Public Road Standards](#), the [Land Development Improvement Plan Checking Manual](#) and the Community Trails Master Plan. The improvements shall be completed within 24 months from the approval of the improvement plans, execution of the agreements, and acceptance of the securities.

**DOCUMENTATION:** The applicant shall complete the following:

- c. Process and obtain approval of Improvement Plans to improve **Idaho Avenue**.
- d. Provide Secured Agreement and post security in accordance with [Subdivision Ordinance Sec. 81.408](#).
- e. Upon approval of the plans, pay all applicable inspection fees/deposits with [DPW, PDC].
- f. If the applicant is a representative, then one of the following is required: a corporate certificate indicating those corporation officers authorized to sign for the corporation, or a partnership agreement recorded in this County indicating who is authorized to sign for the partnership.

**TIMING:** Prior to the approval of the Final Map, the plans, agreements, and securities shall be approved. **MONITORING:** The [PDS, LDR] shall review the plans for consistency with the condition and County Standards. Upon approval of



the plans [*PDS, LDR*] shall request the required securities and improvement agreements. The securities and improvement agreements shall be approved by the Director of Planning and Development Services (PDS).

#### 45. **ROADS#2–ENCROACHMENT PERMIT**

**INTENT:** In order to ensure that improvements for the private road comply with the [County of San Diego Public Road Standards](#), and [The Caltrans Facility Standards and Requirements](#) an encroachment permit shall be obtained and implemented.

**DESCRIPTION OF REQUIREMENT:** A permit shall be obtained from CALTRANS for the improvements to be made within the public right-of-way. This may include road widening, sidewalk, street lighting, turn lanes, and drainage facilities, to the satisfaction of CALTRANS. A copy of the permit and evidence from the issuing agency that all requirements of the permit have been met shall be submitted to the [*PDS, LDR*]. **DOCUMENTATION:** The applicant shall obtain the encroachment permit(s) and provide a copy of the permit, proof of payment, and evidence that all the requirements of the permit have been met, to the [*PDS, LDR*]. The subdivider shall obtain an encroachment permit from CALTRANS authorizing access onto **State Route 78/San Pasqual Valley Road**. This will allow CALTRANS to set conditions such as sight distance and road improvements. The applicant should contact the CALTRANS Permit Office at (619) 688-6158 for additional details. **TIMING:** Prior to the approval of the Final Map, the encroachment permit shall be obtained. **MONITORING:** The [*PDS, LDR*] shall review the permit for compliance with this condition and the applicable improvement plans, and implement any conditions of the permit in the County improvement plans.

*NOTE: Pending review by CALTRANS.*

#### 46. **ROADS#3–PRIVATE ROAD IMPROVEMENTS**

**INTENT:** In order to promote orderly development and to comply with the [Subdivision Ordinance Sec. 81.404](#), the private road easements shall be improved.

**DESCRIPTION OF REQUIREMENT:**

- a. Improve or agree to improve and provide security for the private easement road, **“A” Street**, from Idaho Avenue southerly to a terminus cul-de-sac at Lot 6 and 7, to a graded width of twenty-eight feet (28') with twenty-four feet (24') of asphalt concrete pavement over approved base with asphalt concrete dike at twelve feet (12') from centerline. The improvement and design standards of Section 3.1(C) of the County Standards for Private Roads for one hundred and one (101) to seven hundred fifty (750) trips shall apply, to the satisfaction of the Director of PDS and the City of Escondido Fire Department.
- b. Improve or agree to improve and provide security for the private easement road, **“B” Street**, from the intersection with “A” Street westerly to a terminus cul-de-sac at Lot 13 and 14, to a graded width of twenty-eight feet (28') with twenty-four feet (24') of asphalt concrete pavement over approved base

with asphalt concrete dike at twelve feet (12') from centerline. The improvement and design standards of Section 3.1(C) of the County Standards for Private Roads for one hundred and one (101) to seven hundred fifty (750) trips shall apply, to the satisfaction of the Director of PDS and the City of Escondido Fire Department.

- c. **"A" Street** shall terminate with a cul-de-sac at Lot 6 and 7 graded to a radius of thirty-eight feet (38') and surfaced to a radius of thirty-six feet (36') with asphalt concrete pavement over approved base with asphalt concrete dike with face of dike at thirty-six feet (36') from the radius point, to the satisfaction of the Director of PDS and the City of Escondido Fire Department.
- d. **"B" Street** shall terminate with a cul-de-sac at Lot 13 and 14 graded to a radius of thirty-eight feet (38') and surfaced to a radius of thirty-six feet (36') with asphalt concrete pavement over approved base with asphalt concrete dike with face of dike at thirty-six feet (36') from the radius point, to the satisfaction of the Director of PDS and the City of Escondido Fire Department.
- e. Asphalt concrete surfacing material shall be hand-raked and compacted to form smooth tapered connections along all edges including those edges adjacent to soil. The edges of asphalt concrete shall be hand-raked at 45 degrees or flatter, so as to provide a smooth transition next to existing soil, including those areas scheduled for shoulder backing.

All plans and improvements shall be completed pursuant to the [County of San Diego Private Road Standards](#), and the [Land Development Improvement Plan Checking Manual](#). The improvements shall be completed within 24 months from the approval of the improvement plans, execution of the agreements, and acceptance of the securities. **DOCUMENTATION:** The applicant shall complete the following:

- f. Process and obtain approval of Improvement Plans to construct **"A" Street** and **"B" Street**.
- g. Provide Secured Agreement and post security in accordance with [Subdivision Ordinance Sec. 81.408](#).
- h. Upon approval of the plans, pay all applicable inspection deposits/fees with [DPW, PDC].
- i. If the applicant is a representative, then one of the following is required: a corporate certificate indicating those corporation officers authorized to sign for the corporation, or a partnership agreement recorded in this County indicating who is authorized to sign for the partnership.

**TIMING:** Prior to the approval of the Final Map the required improvement plans, agreements, and securities shall be approved. **MONITORING:** The [PDS, LDR] shall review the plans for consistency with the resolution conditions and County Standards. Upon approval of the plans [PDS, LDR] shall request the required posted securities and executed improvement agreements. The securities and improvement agreements shall be approved by the Director of PDS.

**47. ROADS#4–PAVEMENT CUT POLICY**

**INTENT:** In order to prohibit trench cuts for undergrounding of utilities in all new, reconstructed, or resurfaced paved County-maintained roads for a period of three years following project pavement treatment, and to comply with [County Policy RO-7](#), adjacent property owners shall be notified and solicited for their participation in the extension of utilities. **DESCRIPTION OF REQUIREMENT:** All adjacent property owners shall be notified who may be affected by this policy and are considering development of applicable properties, this includes requesting their participation in the extension of utilities to comply with this policy. No trench cuts for undergrounding of utilities in all new, reconstructed, or resurfaced paved County-maintained roads for a period of three years following project surface. **DOCUMENTATION:** The applicant shall sign a statement that they are aware of the County of San Diego Pavement Cut Policy and submit it to the [PDS, LDR] for review. **TIMING:** Prior to the approval of improvement plans or the recordation of the Final Map, whichever comes first, the Acknowledgement of Department of Public Works Pavement Cut Policy shall be submitted for approval. **MONITORING:** The [PDS, LDR] shall review the acknowledgement letter.

**48. ROADS#5–SIGHT DISTANCE**

**INTENT:** In order to provide an unobstructed view for safety while exiting the property and accessing a public road from the site, and to comply with the Design Standards Section 6.1.E of the [County of San Diego Public Road Standards](#), an unobstructed sight distance shall be verified. **DESCRIPTION OF REQUIREMENT:**

- a. A registered civil engineer or a licensed land surveyor provides a certified signed statement that: “There is \_\_\_\_\_feet of unobstructed intersectional sight distance in both directions from the proposed onsite private easement road “**A” Street** along **Idaho Avenue** in accordance with the methodology described in Table 5 of the March 2012 County of San Diego Public Road Standards. These sight distances exceed the required intersectional Sight Distance requirements of \_\_\_\_\_as described in Table 5 based on a speed of \_\_\_\_\_, which I have verified to be the higher of the prevailing speed or the minimum design speed of the road classification. I have exercised responsible charge for the certification as defined in Section 6703 of the Professional Engineers Act of the California Business and Professions Code.”

- b. If the lines of sight fall within the existing public road right-of-way, the engineer or surveyor shall further certify that: "Said lines of sight fall within the existing right-of-way and a clear space easement is not required."

**DOCUMENTATION:** The applicant shall have a Registered Civil Engineer, or a Licensed Land Surveyor provide a signed statement as detailed above, and submit them to the [PDS, LDR] for review. **TIMING:** Prior to the approval of the Final Map, the sight distance shall be verified. **MONITORING:** The [PDS, LDR] shall verify the sight distance certifications.

#### 49. **ROADS#6–ROAD DEDICATION**

**INTENT:** In order to promote orderly development and to comply with the [Subdivision Ordinance Sec. 81.402](#), road right of way shall be dedicated to the County. **DESCRIPTION OF REQUIREMENT:**

- a. With the Final Map, dedicate the project half of *Idaho Avenue* along the project frontage in accordance with [County of San Diego Public Road Standards](#) for a 2.2D Light Collector Road, to a one-half width of forty-three feet (43') from the ultimate centerline, together with right to extend and maintain slopes and drainage facilities beyond the limits of said right-of-way to the satisfaction of the Director of Public Works/PDS.
- b. The dedication shall be free of any burdens or encumbrances, which would interfere with the purpose for which it is required, and shall be accepted for public use. The affected utility company/district shall enter into a joint use agreement with the County of San Diego to the satisfaction of the Director of PDS.

**DOCUMENTATION:** The applicant shall dedicate the easement on the map and show it as Accepted. **TIMING:** Prior to the recordation of the Final Map the onsite dedication shall be provided for roads with the recordation of the unit the road is within, abuts or provides access to. **MONITORING:** The [PDS, LDR] shall verify that the dedication is indicated on the map and Accepted by the County.

#### 50. **ROADS#7–PRIVATE ROAD EASEMENT**

**INTENT:** In order to promote orderly development and to comply with the [County Subdivision Ordinance Section 81.402](#) the easement(s) shall be provided. **DESCRIPTION OF REQUIREMENT:**

- a. The Final Map shall show a minimum thirty-nine feet eleven inch (39' 11") wide private road easement, "**A**" *Street*, from Idaho Avenue southerly to a terminus cul-de-sac at Lot 6 and 7.
- b. The Final Map shall show a minimum thirty-nine feet eleven inch (39' 11") wide private road easement, "**B**" *Street*, from the intersection with "A" Street westerly to a terminus cul-de-sac at Lot 13 and 14.

**DOCUMENTATION:** The applicant shall show the easements on the Final Map.  
**TIMING:** Prior to approval of the Final Map, the easements shall be shown.  
**MONITORING:** The [PDS, LDR] shall review the Final Map to ensure that the easements are indicated pursuant to this condition.

#### 51. ROADS#8–PRIVATE ROAD MAINTENANCE AGREEMENT

**INTENT:** In order to ensure that the private roads approved with this subdivision are maintained, in accordance with [Subdivision Ordinance Section 81.402\(c\)](#), the applicant shall assume responsibility of the private roads. **DESCRIPTION OF REQUIREMENT:** A maintenance agreement shall be executed that indicates the following:

- a. Maintenance shall be provided through a private road maintenance agreement satisfactory to the Director of PDS.
- b. The Director of PDS shall be notified as to the final disposition of title (ownership) to “**A**” **Street**, and “**B**” **Street** private road easements, and place a note on the Final Map as to the final title status of said roads.
- c. Access to each lot shall be provided by a private road easement not less than thirty-nine feet eleven inches (39’ 11”) wide.

**DOCUMENTATION:** The applicant shall execute the Private Road Maintenance Agreement (PRMA), to the satisfaction of the Director of PDS, and indicate the ownership on the map as indicated above. **TIMING:** Prior to the approval of the Final Map the PRMA shall be executed and the ownership shall be indicated on the Final Map. **MONITORING:** The [PDS, LDR] shall review the executed PRMA and the Final Map for compliance with this condition.

#### 52. ROADS#9–RELINQUISH ACCESS

**INTENT:** In order to promote orderly development and to comply with the [Mobility Element of the General Plan](#), access shall be relinquished. **DESCRIPTION OF REQUIREMENT:**

- a. Relinquish access rights onto **Idaho Avenue** along the project frontage except for the proposed onsite private road easement for “**A**” **Street**, as shown on the approved Tentative Map.
- b. Relinquish access rights onto **State Route 78/San Pasqual Valley Road** along the project frontage except for the CALTRANS approved maintenance access opening, as shown on the approved Tentative Map.

**NOTE:** *Proposed access opening is pending approval by CALTRANS.*

- c. The access relinquishment shall be free of any burdens or encumbrances, which would interfere with the purpose for which it is required.

**DOCUMENTATION:** The applicant shall show the Relinquishment on the Final Map. **TIMING:** Concurrently with the approval of the Final Map, the access shall be relinquished. **MONITORING:** The applicant shall show the relinquishment of access rights on the Final Map and forward a copy to [PDS, LDR] for preapproval. The [PDS, LDR] shall review the Final Map for compliance with this condition.

**53. ROADS#10–ONE FOOT ACCESS DEDICATION**

**INTENT:** In order to ensure that the subdivision's accesses comply with the [County Subdivision Ordinance Section 81.401 \(g\)](#), all the through lots shall relinquish access rights to private roads. **DESCRIPTION OF REQUIREMENT:**

- a. Lots 6 and 7: Show one foot (1') access restriction easement along the lots fronting the private road easement, ***Landavo Rancho Road***.

**DOCUMENTATION:** The applicant shall show the easements on the Final Map. **TIMING:** Prior to or concurrently with approval of the Final Map, the easements shall be granted. **MONITORING:** The [PDS, LDR] shall review the Final Map to ensure that one foot access (1') restriction easements are indicated pursuant to this condition.

**54. ROADS#11–TRAFFIC CONTROL PLAN**

**INTENT:** In order to mitigate below levels of significance for temporary traffic impacts, a Traffic Control Plan (TCP) shall be prepared and implemented. **DESCRIPTION OF REQUIREMENT:** Have A Registered Civil Engineer or licensed Traffic Control Contractor prepare a TCP to the satisfaction of the Director of Public Works (DPW). **DOCUMENTATION:** The applicant shall have the TCP prepared by a Registered Civil Engineer or a licensed Traffic Control Contractor and submit it to [PDS, LDR] for review by [DPW, Traffic]. **TIMING:** Prior to approval of the Final Map, a TCP shall be prepared and approved. **MONITORING:** The [PDS, LDR] shall review the TCP for compliance with this condition.

**55. ROADS#12–HAUL ROUTE PLAN**

**INTENT:** In order to ensure the roads are not damaged by heavy loads that loaded trucks place on the construction route (or subsequent operations- use for applicable projects), a Haul Route Plan (HRP) shall be prepared and implemented. **DESCRIPTION OF REQUIREMENT:** A HRP shall be prepared that addresses the following, but is not limited to: haul routes, truck types and capacity, number of trips per day, estimated quantity of import & export, destination, duration of the haul, and hours of operation.

- a. The implementation of the HRP shall be a condition of any grading, construction, or excavation permit issued by the County. The applicant is responsible for the road maintenance (sweeping as necessary) and repair of any damage caused to the on-site and offsite County maintained roads

that serve the property either during construction or subsequent operations.

- b. The applicant will repair those portions of the roads that are damaged by the heavy loaded trucks. An agreement shall be executed, to require (1) a cash deposit for emergency traffic safety repairs; (2) long-term security for road maintenance and repair of any damage caused by the project to the County maintained roads that serve the project during construction phase on the route identified; and (3) All the roads as identified on the haul route plan shall be returned to the existing condition or better.
- c. Prior to import/export, all affected property owners in the residential neighborhood shall be notified; no equipment or material storage on public roads will be allowed, and sweeping to be performed at the end of each week or more depending on the frequency of hauling.

**DOCUMENTATION:** The applicant shall have the HRP prepared by a Registered Civil Engineer or a licensed Traffic Control Contractor and submit it to [PDS, LDR] for review by [DPW, Road Maintenance]. The applicant shall also execute a secured agreement for any potential damages caused by heavy trucks on the construction route. The agreement and securities shall be approved to the satisfaction of the [DPW, Road Maintenance]. **TIMING:** Prior to recordation of the Final Map a HRP shall be prepared and approved. **MONITORING:** The [PDS, LDR] shall review the HRP for compliance with this condition.

#### 56. **ROADS#13- DEBRIS MANAGEMENT PLAN (DMP)**

**INTENT:** In order to comply with the Grading Material Diversion Program, project recycling and diversion is designed to increase diversion of grading, land clearing, and brushing materials from landfills, extend the useful life of local landfills, and support construction and demolition project compliance with State waste diversion requirements. This includes grading, clearing and brushing material for grading projects over 5,000 cubic yards. For additional questions, please call (858) 694-2463 or email [CDRecycling@sdcountry.ca.gov](mailto:CDRecycling@sdcountry.ca.gov), **DESCRIPTION OF REQUIREMENT:** To divert (recycle, reuse, repurpose) 100% of excavated soils, trees, stumps, rocks, and associated vegetation and soils from the following types of projects: (1) non-residential excavation and grading projects; (2) residential projects that require Major Grading permits. Grading projects greater than 5.000 cubic yards shall prepare a Debris Management Plan (DMP) prior to plan approval. All documentation must be submitted and approved by a DPW Compliance Official. Specific requirements are as follows:

- a. Prior to Grading plan approval, a Debris Management Plan (DMP) is required, consisting of:
  - The type of project.
  - The total cubic yardage for the project.

- The estimated weight of grading or land clearing debris, by material type, that the project is expected to generate.
  - The estimated maximum weight of grading or land clearing debris that can feasibly be diverted via reuse, salvage, or recycling.
  - The estimated weight of grading or land clearing debris that is planned to be disposed of in a landfill.
  - The name of the facility (or facilities) which debris will be exported to.
- b. During grading activities, a Daily Log of all grading, land clearing, and brushing material that is exported or reused/repurposed, must be prepared and retained onsite. The Daily Log must include all export receipts from an inert processing facility, green material processing operation, a C&D processing facility, or other vendor or disposal or transfer station facility that accepted grading material from the approved grading project. If material was reused onsite, other forms of documentation (such as photos) will be accepted in lieu of receipts. Daily logs shall include:
- Identify the project location.
  - Log the date that material was transported off site.
  - Log the type of graded or cleared material.
  - Estimated material weight, tonnage, or cubic yards.
  - Name of entity transporting the material.
  - Name of the receiving facility or exporter, and detailing whether the material was salvaged, recycled, or disposed of in a landfill.
  - Daily log entries shall correspond to receipts by materials transporter or receiving facility. If grading contractor exported materials off-site, receipts shall be compiled with in 90 days of the receipts.
  - Daily logs shall include separate entries for each occurrence of materials reused on site.
  - Daily logs and all receipts shall be maintained at the project site and made available to any County Inspector for compliance with this condition.
- c. Exemption:
- Excavated soil and land-clearing debris that is contaminated by disease or pests are not required to be reused on- or off-site, provided that: (I) the County Agricultural Commissioner has made a determination of disease or pest contamination and permittee follows commissioner's direction for recycling or disposal of the material, (ii) the materials are generated in a known pest and/or disease quarantine zone identified by the California Department of Food and Agriculture, or (iii) the materials are otherwise not required to be reused under the CalGreen Code



**DOCUMENTATION:** The applicant shall prepare the Debris Management Plan (DMP) and submit the plan for review and approval by the DPW Recycling Compliance Official. During grading operations a daily log shall be prepared and kept on-site. For additional questions, please call (858) 694-2463 or email [CDRecycling@sdcountry.ca.gov](mailto:CDRecycling@sdcountry.ca.gov). Templates for all forms required are available at: [https://www.sandiegocounty.gov/content/sdc/dpw/recycling/NewCD\\_Grading.htm](https://www.sandiegocounty.gov/content/sdc/dpw/recycling/NewCD_Grading.htm). I. **TIMING:** Prior to approval of any plan or issuance of any permit, the Debris Management Plan shall be prepared and submitted to the DPW Recycling Official [DPW CO] for review and approval. **MONITORING:** The [DPW, CO] shall review and approve the DMP documents for the project. The [DPW, CO], shall forward the approval of the DMP to [PDS, LDR] for compliance with this condition.

#### 57. STRMWTR#1–STORMWATER MAINTENANCE DOCUMENTATION

**INTENT:** In order to promote orderly development and to comply with the [County Watershed Protection Ordinance \(WPO\) No.10410, County Code Section 67.801 et. seq.](#), the maintenance agreements shall be completed. **DESCRIPTION OF REQUIREMENT:** To the satisfaction of the Director of PDS, complete the following:

- a. Process a Stormwater Facilities Maintenance Agreement (SWMA) to assure maintenance of the Category 2 Structural BMPs and provide security to back up the maintenance pursuant to the County Maintenance Plan Guidelines to the satisfaction of the Director of DPW and/or PDS. The SWMA shall be signed and notarized by the applicant and recorded by the County.

**DOCUMENTATION:** The applicant shall process the agreement forms with [PDS, LDR] and pay the deposit and applicable review fees. **TIMING:** Prior to the recordation of the Final Map, execution of the agreements and securities shall be completed. **MONITORING:** The [PDS, LDR] shall review the agreements/mechanisms for consistency with the condition and County Standards.

#### 58. STRMWTR#2–EROSION CONTROL

**INTENT:** In order to Comply with all applicable stormwater regulations the activities proposed under this application are subject to enforcement under permits from the [State Construction General Permit, Order No. 2009-00090-DWQ](#), or subsequent order and the [County Watershed Protection Ordinance \(WPO\) No.10410, County Code Section 67.801 et. seq.](#) and all other applicable ordinances and standards for this priority project. **DESCRIPTION OF REQUIREMENT:** The applicant shall maintain the appropriate on-site and offsite Best Management Practices pursuant to the approved Stormwater Quality Management Plan (SWQMP) and Erosion Control Plan including, but not limited to the erosion control measures, irrigation systems, slope protection, drainage systems, desilting basins, energy dissipators, and silt control measure.

- a. An agreement and instrument of credit shall be provided pursuant to [Subdivision Ordinance 81.408](#), for an amount equal to the cost of this work as determined or approved by the [PDS, LDR], in accordance with the [County of San Diego Grading Ordinance Section 87.304](#). The cash deposit collected for grading, per the grading ordinance, will be used for emergency erosion measures. The developer shall submit a letter to [PDS, LDR] authorizing the use of this deposit for emergency measures.
- b. An agreement in a form satisfactory to County Counsel shall accompany the Instrument of Credit to authorize the County to unilaterally withdraw any part of or all the Instrument of Credit to accomplish any of the work agreed to if it is not accomplished to the satisfaction of the County PDS and/or DPW by the date agreed.

**DOCUMENTATION:** The applicant shall provide the letter of agreement and any additional security and/or cash deposit to the [PDS, LDR]. **TIMING:** Prior to recordation of the Final Map, and the approval of any plan and the issuance of any permit, the agreement and securities shall be executed. **MONITORING:** The [PDS, LDR] shall ensure that the agreement and the securities provided adequately satisfy the requirements of the conditions to potentially perform the required erosion control and stormwater control measures proposed on all construction and grading plans. [DPW, PDCI] shall use the securities pursuant to the agreement to implement and enforce the required stormwater and erosion control measures pursuant to this condition during all construction phases as long as there are open and valid permits for the site.

#### **Draft Grading Plan Notes:**

***PRE-CONSTRUCTION MEETING:*** (Prior to Preconstruction Conference, and prior to any clearing, grubbing, trenching, grading, or any land disturbances.)

#### **59. BIO#7-RESOURCE AVOIDANCE [PDS, FEE X2]**

**INTENT:** In order to avoid impacts to migratory birds and raptors, which are a sensitive biological resource pursuant to the Migratory Bird Treaty Act (MBTA), a Resource Avoidance Area (RAA), shall be implemented on all plans. **DESCRIPTION OF REQUIREMENT:** There shall be no brushing, clearing and/or grading such that none will be allowed within 300 feet of migratory bird nesting habitat and 500 feet of raptor nesting habitat during the breeding season of the migratory bird and raptor within RAA as indicated on these plans. The breeding season is defined as occurring between February 1 and August 31. The Director of PDS [PDS, PCC] may waive this condition, through written concurrence from the US Fish and Wildlife Service and the California Department of Fish and Wildlife, provided that no migratory birds or raptors are present in the vicinity of the brushing, clearing or grading. **DOCUMENTATION:** The applicant shall provide a letter of agreement with this condition; alternatively, the applicant may submit a written request for waiver of this condition. Although, No Grading shall occur within

the RAA until concurrence is received from the County and the Wildlife Agencies. **TIMING:** Prior to preconstruction conference and prior to any clearing, grubbing, trenching, grading, or any land disturbances and throughout the duration of the grading and construction, compliance with this condition is mandatory unless the requirement is waived by the County upon receipt of concurrence from the Wildlife Agencies. **MONITORING:** The [DPW, PDCI] shall not allow any grading in the RAA during the specified dates, unless a concurrence from the [PDS, PCC] is received. The [PDS, PCC] shall review the concurrence letter.

**60. BIO#8–PRE-CONSTRUCTION BAT SURVEY [PDS, FEE X3]**

**INTENT:** In order to prevent inadvertent disturbance to special status bats, a pre-construction bat survey shall be conducted within the project area prior to brushing, clearing or grading. **DESCRIPTION OF REQUIREMENT:** A County-approved biologist shall perform a pre-construction bat survey in suitable roosting habitat within 72 hours of the start of any grading, clearing, and/or grubbing. If special-status bats are identified during the pre-construction survey, then a qualified biologist should establish an adequate buffer zone in which construction activities are prohibited until the bats can be evicted. Removal of special-status bats will require consultation with the CDFW. If any active roosts are found, clearing shall not proceed until after consultation with County and Wildlife Agency staff, and implementation of any protective measures required. **DOCUMENTATION:** The Biological Monitor shall prepare written documentation that certifies that the bat survey has been completed and that bats have been avoided. **TIMING:** Prior to any clearing, grubbing, grading, or any land disturbances, this condition shall be completed and approved. **MONITORING:** The [DPW, PDCI] shall not allow any grading, unless a concurrence from the [PDS, PPD] is received. The [PDS, PPD] shall review the concurrence letter.

**Draft Grading Plan Notes:**

**Archaeological Monitoring**

**PRE-CONSTRUCTION GRADING AND/OR IMPROVEMENTS:** *(Prior to any clearing, grubbing, trenching, grading, or any land disturbances.)*

**(CULTURAL RESOURCES)**

**61. CULT#GR-1 - ARCHAEOLOGICAL AND TRIBAL MONITORING – PRECONSTRUCTION MEETING**

**INTENT:** In order to comply with the County of San Diego Guidelines for Significance – Cultural Resources, an Archaeological Monitoring Program shall be implemented. **DESCRIPTION OF REQUIREMENT:** The County approved Project Archaeologist and Native American Monitor (s) shall attend the pre-construction meeting with the contractors to explain and coordinate the requirements of the archaeological monitoring program. The Project Archaeologist and Native American Monitor(s) shall monitor the original cutting of previously undisturbed

deposits in all areas identified for development including off-site improvements. The Project Archaeologist and Native American monitor(s) shall also evaluate fill soils to determine that they are clean of cultural resources. The archaeological monitoring program shall comply with the County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements for Cultural Resources. **DOCUMENTATION:** The applicant shall have the contracted Project Archeologist and Native American(s) attend the preconstruction meeting to explain the monitoring requirements. **TIMING:** Prior to any clearing, grubbing, trenching, grading, or any land disturbances this condition shall be completed. **MONITORING:** The [DPW, PDCI] shall confirm the attendance of the approved Project Archaeologist.

**Draft Grading Plan Notes:**

**DURING CONSTRUCTION:** *(The following actions shall occur throughout the duration of the grading construction).*

**62. NOISE#3. TEMPORARY CONSTRUCTION NOISE: [DPW, PDCI].**

**INTENT:** In order to minimize temporary construction noise for grading operations associated with TM-5639 and to comply with County Noise Ordinance 36.408 and 36.409. **DESCRIPTION OF REQUIREMENT:** The project shall comply with the following temporary construction noise control measures and shall comply with the eight hour average sound level of 75 dBA pursuant to Noise Ordinance Section 36.408 & 36.409:

- a. Turn off equipment when not in use.
- b. Equipment used in construction should be maintained in proper operating condition, and all loads should be properly secured, to prevent rattling and banging.
- c. Use equipment with effective mufflers
- d. Configure traffic to minimize the use of back up alarm.
- e. Equipment staging areas should be placed at locations away farthest away from noise sensitive receivers as deemed feasible.
- f. Temporary construction equipment operations shall comply with the County Noise Ordinance Sections 36.408, 409, and 410.

**DOCUMENTATION:** The applicant shall comply with the temporary construction noise measures and the County Noise Ordinance as described within this condition. **TIMING:** The following actions shall occur throughout the duration of the grading construction and construction equipment operations. **MONITORING:** The [DPW, PDCI] shall make sure that the grading contractor complies with the construction

noise control measures of this condition. The [DPW, PDC] shall contact the [PDS, PPD] if the applicant fails to comply with this condition.

**DURING CONSTRUCTION:** *(The following actions shall occur throughout the duration of the grading construction).*

**(CULTURAL RESOURCES)**

**63. CULT#GR-2 - ARCHAEOLOGICAL AND TRIBAL MONITORING – DURING CONSTRUCTION**

**INTENT:** In order to comply with the County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements for Cultural Resources, a Cultural Resource Grading Monitoring Program shall be implemented. **DESCRIPTION OF REQUIREMENT:** The Project Archaeologist and Native American Monitor(s) shall monitor the original cutting of previously undisturbed deposits in all areas identified for development including off-site improvements. The archaeological monitoring program shall comply with the following requirements during earth-disturbing activities:

- a. **Monitoring.** During the original cutting of previously undisturbed deposits, the Project Archaeologist and Native American Monitor(s) shall be onsite as determined necessary by the Project Archaeologist. Inspections will vary based on the rate of excavation, the materials excavated, and the presence and abundance of artifacts and features. The frequency and location of inspections will be determined by the Project Archaeologist in consultation with the Native American Monitor(s). Monitoring of the cutting of previously disturbed deposits will be determined by the Project Archaeologist in consultation with the Native American Monitor(s).
- b. **Inadvertent Discoveries.** In the event that previously unidentified potentially significant cultural resources are discovered:
  1. The Project Archaeologist or the Native American monitor(s) shall have the authority to divert or temporarily halt ground disturbance operations in the area of discovery to allow evaluation of potentially significant cultural resources.
  2. At the time of discovery, the Project Archaeologist shall contact the PDS Staff Archaeologist and culturally-affiliated tribes as identified in the Treatment Agreement and Preservation Plan.
  3. All ground disturbance activities within 100 feet of the discovered cultural resources shall be halted until a meeting is convened between the developer, the project archaeologist, tribal monitor(s), and the tribal representative(s) to discuss the significance of the find. Optionally, the County Archaeologist may attend the meeting to discuss the significance of the find.

4. After consultation with the developer, project archaeologist, tribal monitor(s), and tribal representative(s), a decision shall be made, with the concurrence of the County Archaeologist, as to the appropriate mitigation (documentation, recovery, avoidance, etc.) for the identified cultural resources.
5. After consultation with the developer, project archaeologist, tribal monitor(s), and tribal representative(s), a decision shall be made, with the concurrence of the County Archaeologist, as to the appropriate mitigation (documentation, recovery, avoidance, etc.) for the identified cultural resources.
6. Isolates and clearly non-significant deposits shall be minimally documented in the field. The isolates and/or non-significant deposits shall be reburied onsite as identified in the Treatment Agreement and Preservation Plan.
7. After consultation with the developer, project archaeologist, tribal monitor(s), and tribal representative(s), a decision shall be made, with the concurrence of the County Archaeologist, as to the appropriate mitigation (documentation, recovery, avoidance, etc.) for the identified cultural resources.
8. If cultural resources are identified, one or more of the following treatments, in order of preference, shall be employed:
  - a. Preservation in place of the Cultural Resources, if feasible. Preservation in place means avoiding the resources, leaving them in place where they were found with no development affecting the integrity of the resources.
  - b. Reburial of the resources on the project property. The measures for reburial shall include, at least, the following:
    - Measures and provisions to protect the future reburial area from any future impacts in perpetuity.
    - Reburial shall not occur until all legally required cataloging and basic recordation have been completed, with an exception that sacred items, burial goods and Native American human remains are excluded.
    - Any reburial process shall be culturally appropriate.
    - Listing of contents and location of the reburial shall be included in the confidential appendix of the Monitoring Report.
    - The Monitoring Report shall be filed with the County under a confidential cover and is not subject to Public Records Requests.
  - c. If preservation in place or reburial is not feasible, a Research Design and Data Recovery Program (Program) shall be prepared by the Project Archaeologist in consultation with the Tribe and Native American Monitor(s) and approved by the County Archaeologist prior to implementation. There shall be no destructive or invasive testing on sacred items,

burial goods and Native American human remains. Results concerning finds of any inadvertent discoveries shall be included in the Monitoring Report.

Pursuant to Calif. Pub. Res. Code § 21083.2(b) avoidance is the preferred method of preservation for archaeological resources and cultural resources. If the landowner and the Tribe(s) cannot agree on the significance or the mitigation for the archaeological or cultural resources, these issues will be presented to the Planning & Development Services Director for decision. The Planning & Development Services Director shall make the determination based on the provisions of the California Environmental Quality Act with respect to archaeological resources, recommendations of the project archeologist and shall take into account the cultural and religious principles and practices of the Tribe.

- c. **Human Remains.** If any human remains are discovered:
1. The Property Owner or their representative shall contact the County Coroner and the PDS Staff Archaeologist.
  2. Upon identification of human remains, no further disturbance shall occur in the area of the find until the County Coroner has made the necessary findings as to origin. If the human remains are to be taken offsite for evaluation, they shall be accompanied by the Native American monitor.
  3. If the remains are determined to be of Native American origin, the NAHC shall immediately contact the Most Likely Descendant (MLD).
  4. The immediate vicinity where the Native American human remains are located is not to be damaged or disturbed by further development activity until consultation with the MLD regarding their recommendations as required by Public Resources Code Section 5097.98 has been conducted.
  5. The MLD may with the permission of the landowner, or their authorized representative, inspect the site of the discovery of the Native American human remains and may recommend to the owner or the person responsible for the excavation work means for treatment or disposition, with appropriate dignity, of the human remains and any associated grave goods. The descendants shall complete their inspection and make recommendations or preferences for treatment within 48 hours of being granted access to the site.
  6. Public Resources Code §5097.98, CEQA §15064.5 and Health & Safety Code §7050.5 shall be followed in the event that human remains are discovered.

- d. **Fill Soils.** The Project Archaeologist and Native American monitor(s) shall evaluate fill soils to determine that they are clean of cultural resources.
- e. **Monthly Reporting.** The Project Archaeologist shall submit monthly status reports to the Director of Planning and Development Services starting from the date of the Notice to Proceed to termination of implementation of the archaeological monitoring program. The report shall briefly summarize all activities during the period and the status of progress on overall plan implementation. Upon completion of the implementation phase, a final report shall be submitted describing the plan compliance procedures and site conditions before and after construction.

**DOCUMENTATION:** The applicant shall implement the Archaeological Monitoring Program pursuant to this condition. **TIMING:** The following actions shall occur throughout the duration of the earth disturbing activities. **MONITORING:** The [DPW, PDCI] shall make sure that the Project Archeologist is on-site performing the monitoring duties of this condition. The [DPW, PDCI] shall contact the [PDS, PPD] if the Project Archeologist or applicant fails to comply with this condition.

**ROUGH GRADING:** *(Prior to rough grading approval and issuance of any building permit).*

**64. CULT#GR-3 - ARCHAEOLOGICAL AND TRIBAL MONITORING – ROUGH GRADING**

**INTENT:** In order to comply with the County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements for Cultural Resources, an Archaeological Monitoring Program shall be implemented.

**DESCRIPTION OF REQUIREMENT:** The Project Archaeologist shall prepare one of the following reports upon completion of the earth-disturbing activities that require monitoring:

- a. **No Archaeological Resources Encountered.** If no archaeological resources are encountered during earth-disturbing activities, then submit a final Negative Monitoring Report substantiating that earth-disturbing activities are completed and no cultural resources were encountered. Archaeological monitoring logs showing the date and time that the monitor was on site and any comments from the Native American Monitor must be included in the Negative Monitoring Report.
- b. **Archaeological Resources Encountered.** If archaeological resources were encountered during the earth disturbing activities, the Project Archaeologist shall provide an Archaeological Monitoring Report stating that the field monitoring activities have been completed, and that resources have been encountered. The report shall detail all cultural artifacts and deposits discovered during monitoring and the anticipated time schedule for completion of the reburial and/or repatriation phase of the monitoring.



**DOCUMENTATION:** The applicant shall submit the Archaeological Monitoring Report to [PDS, PPD] for review and approval. Once approved, a final copy of the report shall be submitted to the South Coastal Information Center and any culturally-affiliated Tribe who requests a copy. **TIMING:** Upon completion of all earth-disturbing activities, and prior to Rough Grading Final Inspection (Grading Ordinance SEC 87.421.a.2), the report shall be completed. **MONITORING:** [PDS, PPD] shall review the report or field monitoring memo for compliance with the project MMRP, and inform [DPW, PDCI] that the requirement is completed.

**FINAL GRADING RELEASE:** *(Prior to any occupancy, final grading release, or use of the premises in reliance of this permit).*

**65. CULT#GR-4 - ARCHAEOLOGICAL AND TRIBAL MONITORING – FINAL GRADING**

**INTENT:** In order to comply with the County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements for Cultural Resources, an Archaeological Monitoring Program shall be implemented.

**DESCRIPTION OF REQUIREMENT:** The Project Archaeologist shall prepare a final report that documents the results, analysis, and conclusions of all phases of the Archaeological Monitoring Program if cultural resources were encountered during earth-disturbing activities. The report shall include the following, if applicable:

- a. Department of Parks and Recreation Primary and Archaeological Site forms.
- b. Daily Monitoring Logs
- c. Evidence that all Native American cultural materials in order of preference have been conveyed as follows:

- (1) Evidence that all prehistoric materials collected during the archaeological monitoring program have been reburied onsite.

or

- (2) Evidence that all prehistoric materials collected during the grading monitoring program have been repatriated to a Native American group of appropriate tribal affinity and shall be accompanied by payment of the fees necessary, if required. Evidence shall be in the form of a letter from the Native American tribe to whom the cultural resources have been repatriated identifying that the archaeological materials have been received.

- d. Evidence that all historic cultural materials have been conveyed as follows:

Historic materials shall be curated at a San Diego curation facility and shall not be curated at a Tribal curation facility or repatriated. The collections and associated records, including title, shall be transferred to the San Diego curation facility and shall be accompanied by payment of the fees necessary for permanent curation. Evidence shall be in the form of a letter from the curation facility stating that the historic materials have been received and that all fees have been paid.

- e. If no cultural resources are discovered, a Negative Monitoring Report must be submitted stating that the archaeological monitoring activities have been completed. Grading Monitoring Logs must be submitted with the negative monitoring report.

**DOCUMENTATION:** The applicant's archaeologist shall prepare the final report and submit it to *[PDS, PPD]* for approval. Once approved, a final copy of the report shall be submitted to the South Coastal Information Center (SCIC) and any culturally-affiliated Tribe who requests a copy. **TIMING:** Prior to any occupancy, final grading release, or use of the premises in reliance of this permit, the final report shall be prepared. **MONITORING:** *[PDS, PPD]* shall review the final report for compliance with this condition and the report format guidelines. Upon acceptance of the report, *[PDS, PPD]* shall inform *[PDS, LDR]* and *[DPW, PDCI]*, that the requirement is complete and the bond amount can be relinquished. If the monitoring was bonded separately, then *[PDS, PPD]* shall inform *[PDS or DPW FISCAL]* to release the bond back to the applicant.

## (BIOLOGICAL RESOURCES)

### 66. **BIO#9–OPEN SPACE SIGNAGE & FENCING [PDS, FEE]**

**INTENT:** In order to protect the onsite open space easement for PDS2020-TM-5639, the fencing and signage shall be installed. **DESCRIPTION OF REQUIREMENT:** The permanent fences or walls, and open space signs shall be placed along the open space boundary as shown on these plans and the approved Conceptual Grading and Development Plan for PDS2020-TM-5639.

- a. Evidence shall be site photos and a statement from a California Registered Engineer, or licensed surveyor that the permanent walls or fences, and open space signs have been installed.
- b. The signs must be corrosion resistant, a minimum of 6" x 9" in size, on posts not less than three (3) feet in height from the ground surface, and must state the following:

**Sensitive Environmental Resources  
Area Restricted by Easement**

Entry without express written permission from the County of San Diego is prohibited. To report a violation or for more information about easement restrictions and exceptions contact the County of San Diego,  
Planning & Development Services  
Reference: PDS2020-TM-5639

**DOCUMENTATION:** The applicant shall install the fencing and signage and provide the documentation photos and certification statement to the [PDS, PCC]. **TIMING:** Prior to the occupancy of any structure or use of the premises and prior to Final Grading Release ([Grading Ordinance Sec. 87.421.a.3](#)) the fencing and signage shall be installed. **MONITORING:** The [PDS, PCC] shall review the photos and statement for compliance with this condition.

**67. BIO#10-EASEMENT AVOIDANCE [PDS, FEE]**

**INTENT:** In order to protect sensitive resources, pursuant to [County Grading Ordinance Section 87.112](#) the open space easements shall be avoided.

**DESCRIPTION OF REQUIREMENT:** The easement indicated on this plan is for the protection of sensitive environmental resources, including non-native grassland, walnut woodland, and eucalyptus woodland habitat, and prohibits all of the following on any portion of the land subject to said easement: grading; excavation; placement of soil, sand, rock, gravel, or other material; clearing of vegetation; construction, erection, or placement of any building or structure; vehicular activities; trash dumping; or use for any purpose other than as open space. It is unlawful to grade or clear within an open space easement, any disturbance shall constitute a violation of the [County Grading Ordinance Section 87.112](#) and will result in enforcement action and restoration. The only exception(s) to this prohibition are:

1. Selective clearing of vegetation by hand to the extent required by written order of the fire authorities for the express purpose of reducing an identified fire hazard. While clearing for fire management is not anticipated with the creation of this easement, such clearing may be deemed necessary in the future for the safety of lives and property. All fire clearing shall be pursuant to the applicable fire code of the Fire Authority Having Jurisdiction and the Memorandum of Understanding dated February 26, 1997, between the wildlife agencies and the fire districts and any subsequent amendments thereto.
2. Activities conducted pursuant to a revegetation or habitat management plan approved by the Director of PDS, DPR and DPW.
3. Vegetation removal or application of chemicals for vector control purposes where expressly required by written order of the County of San Diego DEH.

**DOCUMENTATION:** The applicant shall provide a letter statement to the [PDS, PCC] stating that all Sensitive Resource Easements were avoided during the grading construction, and that no impacts or encroachment into the open space occurred. **TIMING:** Prior to Final Grading Release the letter verifying the easements were not disturbed shall be submitted. **MONITORING:** The [DPW, PDC] shall not allow any grading, clearing or encroachment into the open space easement.

IT IS FURTHER RESOLVED, THEREFORE, that the Planning Commission of the County of San Diego hereby makes the following findings as supported by the minutes,

maps, exhibits, and documentation of said Tentative Map all of which are herein incorporated by reference:

1. The Tentative Map is consistent with all elements of the San Diego County General Plan and Land Use Designation Village Residential (VR-2) because it proposes a single-family residential use type at an average density of 0.51 dwelling units per acre on the approximately 10.23-acre site and complies with the provisions of the State Subdivision Map Act and the Subdivision Ordinance of the San Diego County Code;
2. The Tentative Map is consistent with the Zoning Ordinance because it proposes a single-family residential use type in the A70 Limited Agricultural Use Regulations;
3. The design and improvements of the proposed subdivision are consistent with all elements of the San Diego County General Plan and with the North County Metropolitan Subregional Plan, and comply with the provisions of the State Subdivision Act and the Subdivision Ordinance of the San Diego County Code;
4. The site is physically suitable for the residential use type of development because the development footprint will be consolidated to the maximum extent feasible to avoid resources onsite, will be located in an area surrounded by single-family development, a church and school, and a plant nursery, and the site is previously disturbed;
5. The site is physically suitable for the proposed density of development because imported water supply will be provided by the City of Escondido, Fire Services will be provided by the Escondido Fire Department, and school services will be provided by the Escondido Union School and High School Districts;
6. The design of the subdivision and the type of improvements will not cause public health problems because adequate water supply and onsite wastewater treatment systems have been found to be available or can be provided concurrent with need;
7. The design of the subdivision or the proposed improvements are not likely to cause substantial environmental damage or substantially and avoidably injure fish or wildlife or their habitat based upon the findings of a revised CEQA 15183 Checklist dated March 31, 2022;
8. The design of the subdivision or the type of improvements do not conflict with easements, acquired by the public at large, for access through, or use of property within the proposed subdivision, as defined under Section 66474 of the Government Code, State of California; and

The division and development of the property in the manner set forth on the approved Tentative Map will not unreasonably interfere with the free and complete exercise of the public entity or public utility right-of-way or easement;

9. There will not be discharge of sewage waste from the subdivision into the San Diego County Sanitation District sewer system. Therefore, the subdivision will not result in violation of existing requirements prescribed by the California Regional Water Quality Control Board pursuant to Division 7 (commencing with Section 13000) of the Water Code, as specified by Government Code Section 66474.6;
10. Adequate facilities and services have been assured and adequate environmental review and documentation have been prepared; and
11. Determinations and findings pursuant to the California Environmental Quality Act, the Resource Protection Ordinance, and the Watershed Protection, Stormwater Management, and Discharge Control Ordinance have been made by the Board of Directors.

**MAP PROCESSING REQUIREMENTS:** The final map shall comply with the following processing requirements pursuant to the [Sections 81.501 through 81.517 of the Subdivision Ordinance](#) and the [Subdivision Final Map Processing Manual](#).

- The Final map shall show an accurate and detailed vicinity map.
- The Basis of Bearings for the Final Map shall comply with [Section 81.507 of the Subdivision Ordinance](#).
- Prior to the approval of the Final Map by the Department of Public Works, the subdivider shall provide the Department of Public Works with a copy of the deed by which the subject property was acquired and a Final Map report from a qualified title insurance company.
- The following notes shall appear on the Final Map:
  - All parcels within this subdivision have a minimum of 100 square feet of solar access for each future dwelling unit allowed by this subdivision as required by [Section 81.401\(m\) of the Subdivision Ordinance](#).
  - At the time of recordation of the Final Map, the name of the person authorizing the map and whose name appears on the SURVEYOR'S CERTIFICATE as the person who requested the map, shall be the name of the owner of the subject property.
  - The public and private easement roads serving this project shall be named. The responsible party shall contact the Street Address Section of Planning & Development Services (858-694-3797) to discuss the road naming requirements for the development. Naming of the roads is necessary for the health and safety of present and future residents.

**ORDINANCE COMPLIANCE NOTIFICATIONS:** The project is subject to, but not limited to, the following County of San Diego, State of California, and U.S. Federal Government, Ordinances, Permits, and Requirements:

**NOTICE:** The subject property contains wetlands, a lake, a stream, and/or waters of the U.S. which may be subject to regulation by State and/or federal agencies, including, but not limited to, the Regional Water Quality Control Board, U.S. Army Corps of Engineers and the California Department of Fish and Wildlife. It is the applicant's responsibility to consult with each agency to determine if a permit, agreement or other approval is required and to obtain all necessary permits, agreements or approvals before commencing any activity which could impact the wetlands, lake, stream, and/or waters of the U.S. on the subject property. The agency contact information is provided below.

U.S. Army Corps of Engineers: 6010 Hidden Valley Rd, Suite 105, Carlsbad, CA 92011-4219; (858) 674-5386; <http://www.usace.army.mil/>  
Regional Water Quality Control Board: 9174 Sky Park Court, Suite 100, San Diego, CA 92123-4340; (858) 467-2952; <http://www.waterboards.ca.gov/sandiego/>  
California Department of Fish and Wildlife: 3883 Ruffin Rd., San Diego, CA 92123; (858) 467-4201; <http://www.dfg.ca.gov/>

**LIGHTING ORDINANCE COMPLIANCE:** In order to comply with the County Lighting Ordinance 59.101 et seq. and Zoning Ordinance Sections 6322, 6324, and 6326, the onsite lighting shall comply with the approved plot plan(s), specific permit conditions and approved building plans associated with this permit. All light fixtures shall be designed and adjusted to reflect light downward, away from any road or street, and away from adjoining premises, and shall otherwise conform to the County Lighting Ordinance 59.101 et seq. and Zoning Ordinance Sections 6322, and 6324. The property owner and permittee shall conform to the approved plot plan(s), specific permit conditions, and approved building plans associated with this permit as they pertain to lighting. No additional lighting is permitted. If the permittee or property owner chooses to change the site design in any way, they must obtain approval from the County for a Minor Deviation or a Modification pursuant to the County of San Diego Zoning Ordinance.

**NOISE ORDINANCE COMPLIANCE:** In order to comply with the [County Noise Ordinance 36.401](#) et seq. and the Noise Standards pursuant to the General Plan Noise Element (Table N-1 & N-2), the property and all of its uses shall comply with the approved plot plans, specific permit conditions and approved building plans associated with this permit. No noise generating equipment and project related noise sources shall produce noise levels in violation of the County Noise Ordinance. The property owner and permittee shall conform to the approved plot plan(s), specific permit conditions, and approved building plans associated with this permit as they pertain to noise generating devices or activities. If the permittee or property owner chooses to change the site design in any way, they must obtain approval from the County for a Minor Deviation or a Modification pursuant to the County of San Diego Zoning Ordinance.

**STORMWATER ORDINANCE COMPLIANCE:** In order to Comply with all applicable stormwater regulations the activities proposed under this application are subject to enforcement under permits from the [San Diego Regional Water Quality Control Board \(RWQCB\)](#) and the County of San Diego Watershed Protection, Stormwater Management, and Discharge Control [Ordinance No. 10410](#) and all other applicable ordinances and standards for the life of this permit. The project site shall be in compliance with all applicable stormwater regulations referenced above and all other applicable ordinances and standards. This includes compliance with the approved Stormwater Quality Management Plan, all requirements for Low Impact Development (LID), Hydromodification, materials and wastes control, erosion control, and sediment control on the project site. Projects that involve areas 1 acre or greater require that during construction the property owner keeps the Storm Water Pollution Prevention Plan (SWPPP) onsite and update it as needed. The property owner and permittee shall comply with the requirements of the stormwater regulations referenced above.

**LOW IMPACT DEVELOPMENT NOTICE:** The San Diego Regional Water Quality Control Board (SDRWQCB) issued a new Municipal Stormwater Permit under the National Pollutant Discharge Elimination System (NPDES). The requirements of the Municipal Permit were implemented beginning in May 2013 and amended in November 2015. *Project design shall be in compliance with the new Municipal Permit regulations.* The Low Impact Development (LID) Best Management Practices (BMP) Requirements of the Municipal Permit can be found at the following link:

[http://www.sandiegocounty.gov/content/dam/sdc/dpw/WATERSHED\\_PROTECTION\\_PROGRAM/susmppdf/lid\\_handbook\\_2014sm.pdf](http://www.sandiegocounty.gov/content/dam/sdc/dpw/WATERSHED_PROTECTION_PROGRAM/susmppdf/lid_handbook_2014sm.pdf)

The County has provided a LID Handbook as a source for LID information and is to be utilized by County staff and outside consultants for implementing LID in our region. See link below:

<http://www.sdcounty.ca.gov/dplu/docs/LID-Handbook.pdf>

**STORMWATER COMPLIANCE NOTICE:** Updated studies, including Hydro-modification Management Plans for Priority Development Projects, will be required prior to approval of grading and improvement plans for construction pursuant to [County of San Diego Watershed Protection, Stormwater Management and Discharge Control Ordinance No. 10410](#) (N.S.), dated February 26, 2016 and BMP Design Manual. These requirements are subject to the MS4 Permit issued by the Regional Water Quality Control Board, Order No. R9-2013-0001 and any subsequent order. Additional studies and other action may be needed to comply with future MS4 Permits.

**DRAINAGE:** The project shall be in compliance with the County of San Diego [Flood Damage Prevention Ordinance](#) No. 10091, adopted December 8, 2010.

**GRADING PERMIT REQUIRED:** A grading permit is required prior to commencement of grading when quantities of excavation or fill results in the movement of material

exceeding 200 cubic yards or eight feet (8') in vertical height of cut/fill, pursuant to [Section 87.201 of Grading Ordinance](#).

**CONSTRUCTION PERMIT REQUIRED:** A Construction Permit and/or Encroachment Permit are required for any and all work within the County road right-of-way. Contact DPW Construction/Road right-of-way Permits Services Section, (858) 694-3275, to coordinate departmental requirements. In addition, before trimming, removing or planting trees or shrubs in the County Road right-of-way, the applicant must first obtain a permit to remove plant or trim shrubs or trees from the Permit Services Section.

**ENCROACHMENT PERMIT REQUIRED:** An Encroachment Permit is required for any and all proposed/existing facilities within the County right-of-way. Idaho Avenue is shown as a Light Collector Road on the Mobility Element of the County General Plan. At the time of construction of future road improvements, the proposed facilities shall be relocated at no cost to the County, to the satisfaction of the Director of Public Works.

**EXCAVATION PERMIT REQUIRED:** An excavation permit is required for undergrounding and/or relocation of utilities within the County right-of-way.

**PARK LAND DEDICATION ORDINANCE COMPLIANCE:** The PDS2020-TM-5639 project residential subdivision is subject to the County of San Diego Park Land Dedication Ordinance (PLDO) pursuant to Section 810.101 et. seq. The PLDO fee shall be paid and a note placed on the final map. PLDO fees shall be collected on a per lot or dwelling unit basis prior to the issuance of a building permit for each lot or dwelling unit, or such other permit as may be required to authorize the construction of a dwelling. The fee is calculated pursuant to the ordinance at the time of building permit issuance. The applicant shall pay the PLDO fee at the [PDS, LD Counter].

**TRANSPORTATION IMPACT FEE:** The project is subject to County of San Diego Transportation Impact Fee (TIF) pursuant to [County TIF Ordinance number 77.201 – 77.223](#). The Transportation Impact Fee (TIF) shall be paid. The fee is required for the entire project, or it can be paid at building permit issuance for each phase of the project. The fee is calculated pursuant to the ordinance at the time of building permit issuance. The applicant shall pay the TIF at the [PDS, LD Counter] and provide a copy of the receipt to the [PDS, BD] at time of permit issuance.

**BIOLOGICAL RESOURCES NOTICE:** The subject property contains habitat which may be used for nesting by migratory birds. Any grading, brushing or clearing conducted during the migratory bird breeding season, February 1 – August 31, has a potential to impact nesting or breeding birds in violation of the Migratory Bird Treaty Act. The applicant may submit evidence that nesting or breeding migratory birds will not be affected by the grading, brushing or clearing to these agencies: California Department of Fish and Wildlife, 3883 Ruffin Rd., San Diego, CA 92123, (858) 467-4201, <http://www.dfg.ca.gov/>; and United States Fish and Wildlife Service, 2177 Salk Avenue, Suite 250, Carlsbad, California 92008, (760) 431-9440, <http://www.fws.gov/>.



**NOTICE:** THE ISSUANCE OF THIS PERMIT BY THE COUNTY OF SAN DIEGO DOES NOT AUTHORIZE THE APPLICANT FOR SAID PERMIT TO VIOLATE ANY FEDERAL, STATE, OR COUNTY LAWS, ORDINANCES, REGULATIONS, OR POLICIES INCLUDING, BUT NOT LIMITED TO, THE FEDERAL ENDANGERED SPECIES ACT AND ANY AMENDMENTS THERETO.

**NOTICE:** The project will be required to pay Planning & Development Services Mitigation Monitoring and Condition Review Fee. The fee will be collected at the time of the first submittal for Condition Satisfaction to PDS, including Mitigation Monitoring requests. The amount of the fee will be determined by the current Fee Ordinance requirement at the time of the first submittal and is based on the number of PDS conditions that need to be satisfied. The fee amount will only be paid one time for those conditions that are indicated with the **[PDS, FEE]** designator. The fee will not apply to subsequent project approvals that require a separate submittal fee such as, Revegetation and Landscape Plans, Resource (Habitat) Management Plans, Habitat Loss Permits, Administrative Permits, Site Plans, and any other discretionary permit applications.

**NOTICE:** The 90-day period in which the applicant may file a protest of the fees, dedications or exactions begins on the date of issuance of the Final Notice of Decision.

<b>EXPLANATION OF COUNTY DEPARTMENT AND DIVISION ACRONYMS</b>			
<b>Planning &amp; Development Services (PDS)</b>			
Project Planning Division	PPD	Land Development Project Review Teams	LDR
Permit Compliance Coordinator	PCC	Project Manager	PM
Building Plan Process Review	BPPR	Plan Checker	PC
Building Division	BD	Map Checker	MC
Building Inspector	BI	Landscape Architect	LA
Zoning Counter	ZO		
<b>Department of Public Works (DPW)</b>			
Private Development Construction Inspection	PDCI	Environmental Services Unit	ESU
<b>Department of Environmental Health (DEH)</b>			
Land and Water Quality Division	LWQ	Local Enforcement Agency	LEA
Vector Control	VCT	Hazmat Division	HMD
<b>Department of Parks and Recreation (DPR)</b>			
Trails Coordinator	TC	Group Program Manager	GPM
Parks Planner	PP		
<b>Department of General Service (DGS)</b>			

Real Property Division	RP		
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ON MOTION of Commissioner \_\_\_\_\_, seconded by Commissioner \_\_\_\_\_, this Resolution is passed and approved by the Planning Commission of the County of San Diego, State of California, at a regular meeting held on this 22<sup>nd</sup> day of July 2022, in COC Campus Center Chambers, 5520 Overland Avenue, San Diego, California, by the following vote:

AYES:

NOES:

ABSENT:

Approved as to Form and Legality  
County Counsel

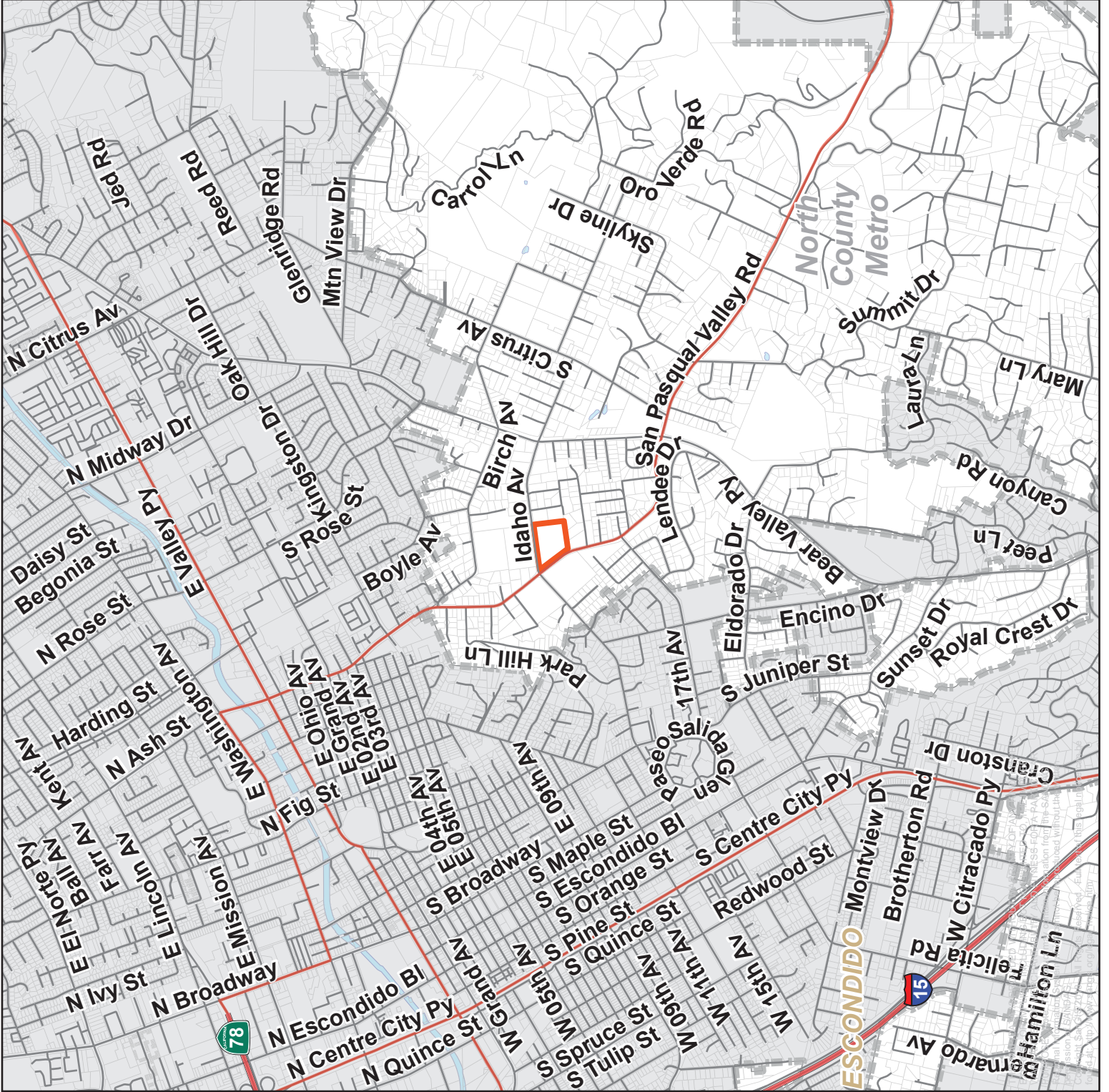
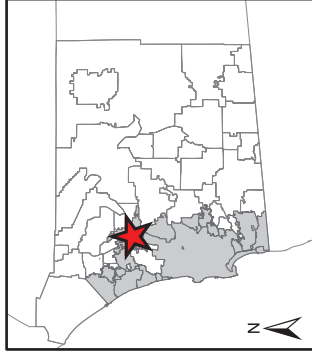
By: \_\_\_\_\_

Randall Sjoblom, Senior Deputy  
County Counsel

## **Attachment D – Planning Documentation**

# Escondido Estates Vicinity Map

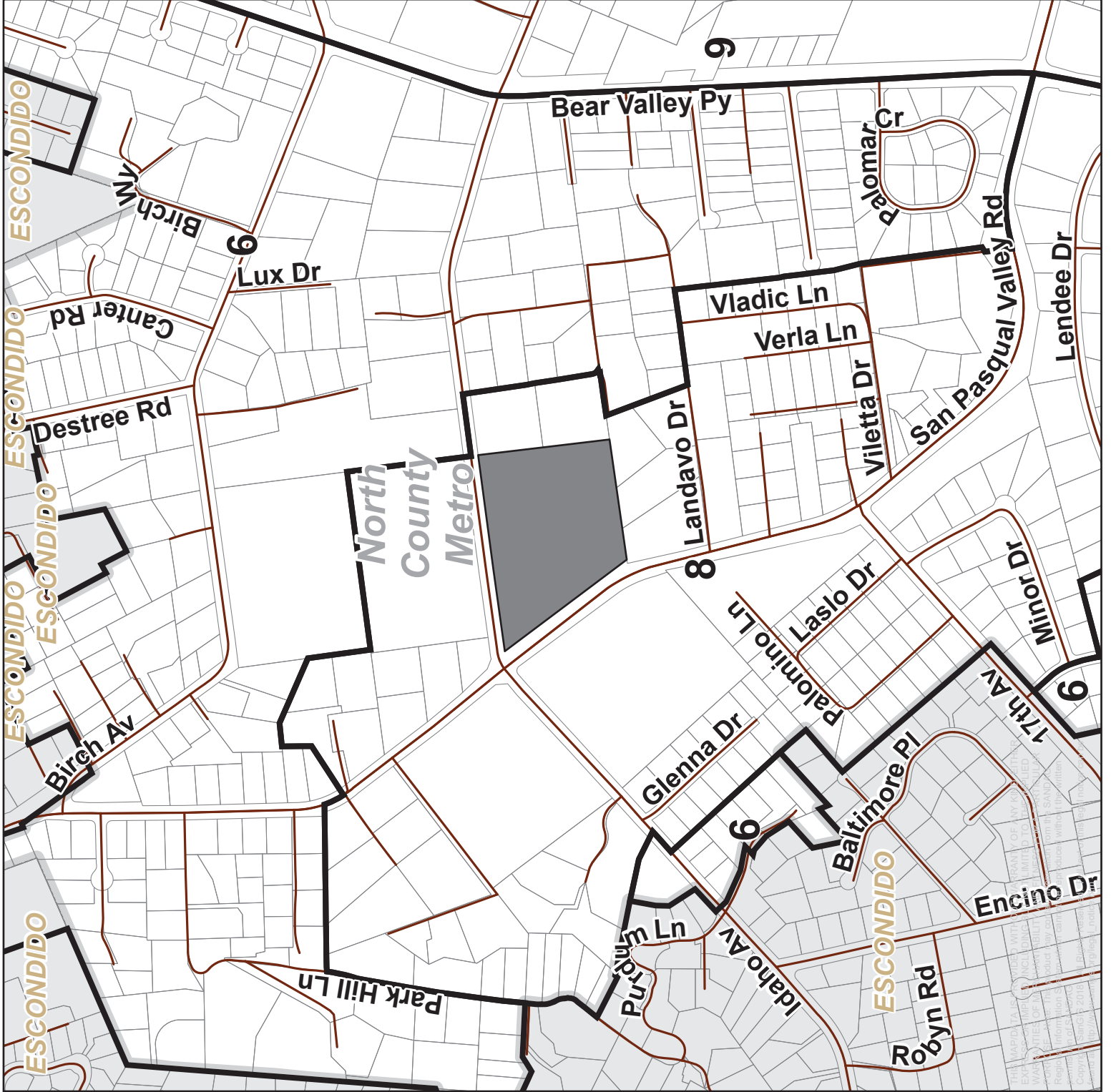
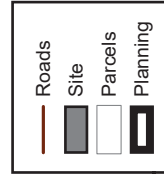
North County Metro  
Community Plan Area



Escondido Estates  
General Plan

North County Metro  
Community Plan Area

- (6) Village Residential (VR-4.3)
- (8) Village Residential (VR-2)
- (9) Semi-Rural Residential (SR-1)



Escondido Estates

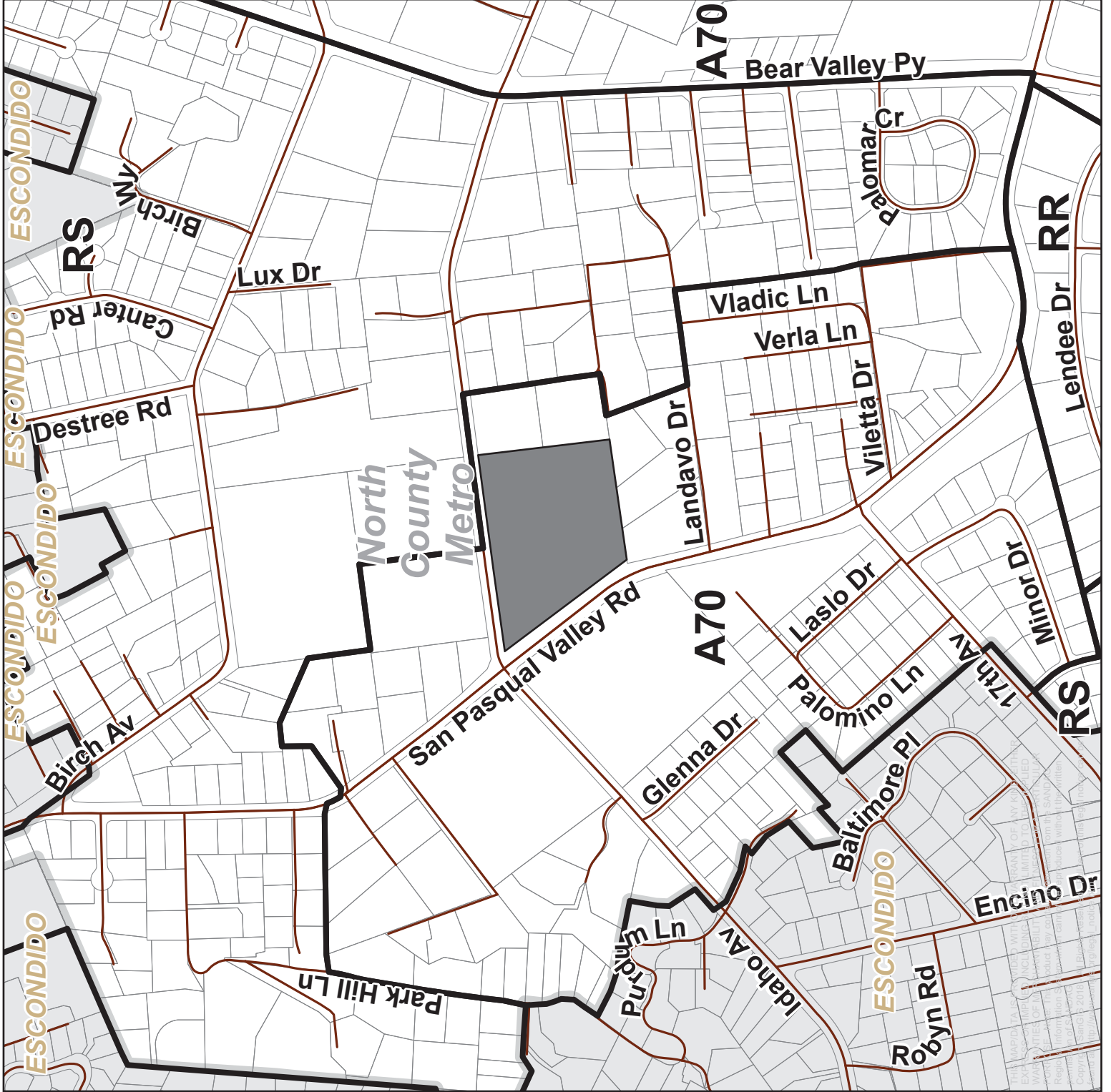
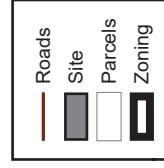
Zoning

North County Metro  
Community Plan Area

A70 - Limited Agricultural

RR - Rural Residential

RS - Single Family Residential



# Escondido Estates

North County Metro Community Plan Area



North County Metro  
Community Plan Area

— Roads



Site



Date: 6/30/2021 Path: Q:\20210630\_Escondido\_Estates\_TMI\Esco\_Estates.aprx

Idaho Av

North County  
Metro

San Pasqual Valley Rd

THIS MAP/DATA PROVIDES WITHOUT WARRANTY OF ANY KIND, EITHER EXPRESS OR IMPLIED, INCLUDING BUT NOT LIMITED TO, THE IMPLIED WARRANTIES OF MERCHANTABILITY AND FITNESS FOR A PARTICULAR PURPOSE. Make this contact for more information from the San Diego Regional Information System which cannot be reproduced without the written permission of SANDAG. All Rights Reserved. All text on this legal notice can be found at <http://www.sandag.org/gis/legal/notice.html>

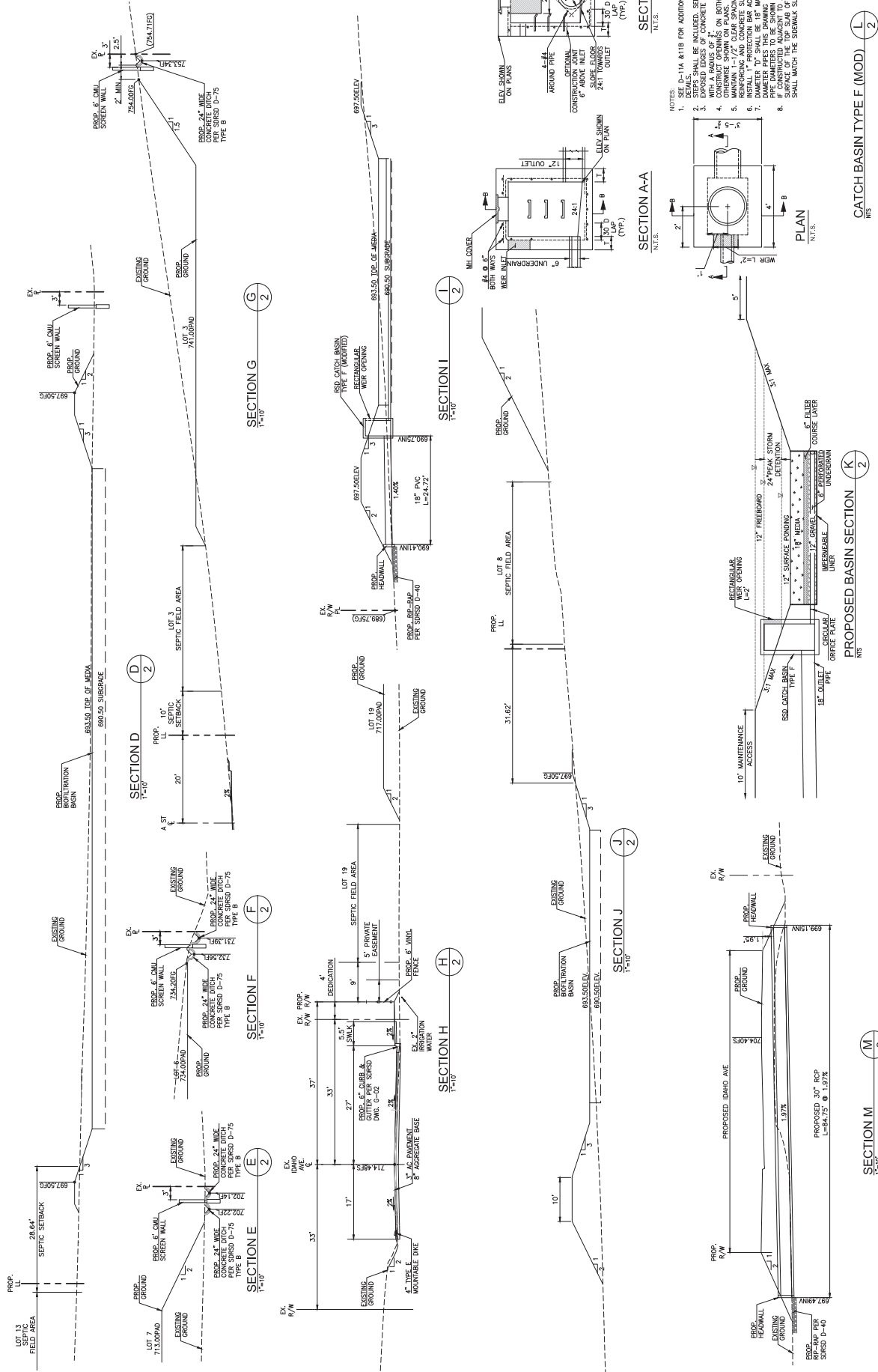












- NOTES:
1. DETAILS 6-11A & 11B FOR ADDITIONAL NOTES AND DETAILS.
  2. ALL CONCRETE SHALL BE ROUNDED WITH A RADIUS OF 2".
  3. CONSTRUCT OPENINGS ON BOTH SIDE UNLESS OTHERWISE NOTED.
  4. MAINTAIN 1-1/2" CLEAR SPACING BETWEEN REINFORCING BARS AND CONCRETE SURFACES.
  5. DIAMETER SHALL BE 18" MAX. FOR LARGER DIAMETERS TO BE SHOWN ON PLAN.
  6. IF CONSTRUCTED ADJACENT TO A SIDEWALK, THE PIPE SHALL BE SET TO MATCH THE SIDEWALK SLOPE AND FINISH.

SECTIONS & DETAILS  
**ESCONDIDO ESTATES**  
 TM 5639  
 COUNTY OF SAN DIEGO, CALIFORNIA



ENGINEERING & CONSULTING, INC.  
 10000 SAN DIEGO AVENUE, SUITE 100  
 SAN DIEGO, CALIFORNIA 92131  
 619-594-8888 | [www.jrc-engineering.com](http://www.jrc-engineering.com)

PREPARED BY: [Signature]

NO.	REVISIONS	DATE

SECTION M  
 1"=10'  
 PROPOSED 30" RCP  
 L=84.75' @ 1.97%





## **Attachment E – Environmental Documentation**



# County of San Diego

PLANNING & DEVELOPMENT SERVICES  
 5510 OVERLAND AVENUE, SUITE 310, SAN DIEGO, CA 92123  
 (858) 505-6445 General • (858) 694-2705 Codes  
 (858) 565-5920 Building Services  
[www.SDCPDS.org](http://www.SDCPDS.org)

**DAHVIA LYNCH**  
 DIRECTOR

March 30, 2022 July 15, 2024

## Statement of Reasons for Exemption from Additional Environmental Review and 15183 Checklist Pursuant to CEQA Guidelines §15183

**Project Name:** Escondido Estates  
**Project Record Numbers:** PDS2020-TM-5639; PDS2020-AD-20-007  
**Environmental Log Number:** PDS2020-ER-20-08-007

**APN(s):** 234-231-01-00

**Lead Agency Name and Address:**  
 County of San Diego  
 Planning and Development Services  
 5510 Overland Avenue, Suite 110  
 San Diego, CA 92123-1239

**County Staff Contact:**  
Juliette Orozco  
[juliette.orozco@sdcounty.ca.gov](mailto:juliette.orozco@sdcounty.ca.gov)  
(619) 323-7949

### **Project Location:**

The proposed Escondido Estates project (Project) is located within the unincorporated community of Escondido in northern San Diego County. The approximately 10.3-acre Project site is located southeast of the intersection of San Pasqual Valley Road (SR-78) and Idaho Ave, near the City of Escondido municipal boundary. The site is located within the North County Metropolitan Subregional Plan area. Single-family residential development within the unincorporated County abuts the Project site to the east and south, with vacant land to the north, and a church and school immediately adjacent to the west.

### **Project Applicant Name and Address:**

Oscar Uranga  
 19782 MacArthur Blvd., Suite 300  
 Irvine, CA 92612

### **General Plan**

Community Plan: North County Metropolitan Subregional Plan



## 15183 Statement of Reasons

Regional Categories:	Village
Land Use Designations:	Village Residential (VR-2)
Density:	VR-2 (2 Du/Ac)
Floor Area Ratio (FAR)	N/A

**Zoning**

Use Regulation:	Limited Agricultural (A70)
Minimum Lot Size:	0.5 acre
Special Area Regulation:	N/A

**Description of Project:**

The Project is a request for a Tentative Map consisting of 20 single-family residential lots and 2 HOA lots for open space, drainage, and roadway purposes. The Project includes an Administrative Permit to allow for lots smaller than the minimum lot size (lot area averaging). The Escondido Estates (Project) applicant proposes the subdivision of an approximately 10.3-acre parcel into 20 single-family residential lots within the North County Metropolitan Subregional Plan area. The Project site is vacant, with an existing on-site well within an easement to the neighboring parcel to the north, which would be retained by the Project. The Project site is surrounded primarily by single-family residential development interspersed with vacant land and adjacent to an existing church and private school across San Pasqual Valley Road. The site and surrounding lands are flat to moderately sloped with an average slope between 5% to 15% percent. Access to the site will be provided by a private road connection to Idaho Avenue. The Project would be served by onsite wastewater treatment systems for each lot and imported water from the City of Escondido.

Discretionary Actions:

Discretionary permits for the Project include a Tentative Map and an Administrative Permit. The Tentative Map would subdivide the approximately 10.3-acre Project site to 20 single-family residential lots with 2 HOA lots. The Administrative Permit would allow for lot area averaging to create lots smaller than the minimum lot size prescribed by Zoning for the site.

**Overview of 15183 Checklist**

California Public Resources Code section 21083.3 and California Environmental Quality Act (CEQA) Guidelines Section 15183 provide an exemption from additional environmental review for projects that are consistent with the development density established by existing zoning, community plan or general plan policies for which an Environmental Impact Report (EIR) was certified, except as might be necessary to examine whether there are project-specific significant effects which are peculiar to the project or its site. Section 15183 specifies that examination of environmental effects shall be limited to those effects that: (1) Are peculiar to the project or the parcel on which the project would be located, and were not analyzed as significant effects in a prior EIR on the zoning action, general plan, or community plan, with which the project is consistent, (2) Are potentially significant off-site impacts and cumulative impacts which were not discussed in the prior EIR prepared for the general plan, community plan or zoning action, or (3) Are previously identified significant effects which, as a result of substantial new information which was not known at the time the EIR was certified, are determined to have a more severe adverse impact than discussed in the prior EIR. Section 15183(c) further specifies that if an impact is not peculiar to the parcel or to the proposed project, has been addressed as a significant effect in the prior EIR, or can be substantially mitigated by the imposition of uniformly applied development policies or standards, then an additional EIR need not be prepared for that project solely on the basis of that impact.

### **General Plan Update Program EIR**

The County of San Diego General Plan Update (GPU) establishes a blueprint for future land development in the unincorporated County that meets community desires and balances the environmental protection goals with the need for housing, agriculture, infrastructure, and economic vitality. The GPU applies to all of the unincorporated portions of San Diego County and directs population growth and plans for infrastructure needs, development, and resource protection. The GPU included adoption of new General Plan elements, which set the goals and policies that guide future development. It also included a corresponding land use map, a County Road Network map, updates to Community and Subregional Plans, an Implementation Plan, and other implementing policies and ordinances. The GPU focuses population growth in the western areas of the County where infrastructure and services are available in order to reduce the potential for growth in the eastern areas. The objectives of this population distribution strategy are to: 1) facilitate efficient, orderly growth by containing development within areas potentially served by the San Diego County Water Authority (SDCWA) or other existing infrastructure; 2) protect natural resources through the reduction of population capacity in sensitive areas; and 3) retain or enhance the character of communities within the unincorporated County. The SDCWA service area covers approximately the western one third of the unincorporated County. The SDWCA boundary generally represents where water and wastewater infrastructure currently exist. This area is more developed than the eastern areas of the unincorporated County, and would accommodate more growth under the GPU.

The GPU EIR was certified in conjunction with adoption of the GPU on August 3, 2011. The GPU EIR comprehensively evaluated environmental impacts that would result from Plan implementation, including information related to existing site conditions, analyses of the types and magnitude of project-level and cumulative environmental impacts, and feasible mitigation measures that could reduce or avoid environmental impacts.

### **Summary of Findings**

The Escondido Estates Project is consistent with the analysis performed for the GPU EIR. Further, the GPU EIR adequately anticipated and described the impacts of the Project, identified applicable mitigation measures necessary to reduce Project specific impacts, and the Project implements these mitigation measures (see [http://www.sdcounty.ca.gov/PDS/gpupdate/docs/BOS\\_Aug2011/EIR/FEIR\\_7.00\\_-\\_Mitigation\\_Measures\\_2011.pdf](http://www.sdcounty.ca.gov/PDS/gpupdate/docs/BOS_Aug2011/EIR/FEIR_7.00_-_Mitigation_Measures_2011.pdf) for complete list of GPU Mitigation Measures).

A comprehensive environmental evaluation has been completed for the Project as documented in the attached §15183 Exemption Checklist. This evaluation concludes that the Project qualifies for an exemption from additional environmental review because it is consistent with the development density and use characteristics established by the County of San Diego General Plan, as analyzed by the San Diego County General Plan Update Final Program EIR (GPU EIR, ER #02-ZA-001, SCH #2002111067), and all required findings can be made.

In accordance with CEQA Guidelines §15183, the Project qualifies for an exemption because the following findings can be made:

1. **The Project is consistent with the development density established by existing zoning, community plan or general plan policies for which an EIR was certified.**  
The Project would divide a 10.3-acre parcel into 20 single-family residential lots, which is consistent with the VR-2 development density established by the General Plan and the certified GPU EIR with the approval of an Administrative Permit for Lot Area Averaging.
2. **There are no Project specific effects which are peculiar to the Project or its site, and which the GPU EIR Failed to analyze as significant effects.**

The subject property is no different than other properties in the surrounding area, and there are no project specific effects which are peculiar to the project or its site. The project site is located in an area developed with similarly sized residential lots with associated accessory uses. The property does not support any peculiar environmental features, and the Project would not result in any peculiar effects.

In addition, as explained further in the 15183 Checklist below, all project impacts were adequately analyzed by the GPU EIR. The Project could result in potentially significant impacts to air quality, biological resources, cultural resources, hydrology and water quality, and wildfire. However, applicable mitigation measures specified within the GPU EIR have been made conditions of approval for this Project.

**3. There are no potentially significant off-site and/or cumulative impacts which the GPU EIR failed to evaluate.**

The Project is consistent with the density and use characteristics of the development considered by the GPU EIR. The GPU EIR considered the incremental impacts of the Project, and as explained further in the 15183 Exemption Checklist below, no potentially significant off-site or cumulative impacts have been identified which were not previously evaluated.

**4. There is no substantial new information which results in more severe impacts than anticipated by the GPU EIR.**

As explained in the 15183 exemption checklist below, no new information has been identified which would result in a determination of a more severe impact than what had been anticipated by the GPU EIR.

**5. The Project will undertake feasible mitigation measures specified in the GPU EIR.**

As explained in the 15183 exemption checklist below, the Project will undertake feasible mitigation measures specified in the GPU EIR. These GPU EIR mitigation measures will be undertaken through Project design, compliance with regulations and ordinances, or through the Project's conditions of approval.

Signature	Date
<b>Juliette Orozco</b>	<b>Project Manager</b>
Printed Name	Title

## CEQA Guidelines §15183 Exemption Checklist

### Overview

This checklist provides an analysis of potential environmental impacts resulting from the Project. Following the format of CEQA Guidelines Appendix G, environmental effects are evaluated to determine if the Project would result in a potentially significant impact triggering additional review under Guidelines section 15183.

- Items checked “Significant Project Impact” indicates that the Project could result in a significant effect which either requires mitigation to be reduced to a less than significant level or which has a significant, unmitigated impact.
- Items checked “Impact not identified by GPU EIR” indicates the Project would result in a Project specific significant impact (peculiar off-site or cumulative that was not identified in the GPU EIR.
- Items checked “Substantial New Information” indicates that there is new information which leads to a determination that a Project impact is more severe than what had been anticipated by the GPU EIR.

A Project does not qualify for a §15183 exemption if it is determined that it would result in: 1) a peculiar impact that was not identified as a significant impact under the GPU EIR; 2) a more severe impact due to new information; or 3) a potentially significant off-site impact or cumulative impact not discussed in the GPU EIR.

A summary of staff’s analysis of each potential environmental effect is provided below the checklist for each subject area. A list of references, significance guidelines, and technical studies used to support the analysis is attached in Appendix A. Appendix B contains a list of GPU EIR mitigation measures.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
<b>1. AESTHETICS</b> – Would the Project:			
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Discussion**

1(a) The GPU EIR concluded this impact to be less than significant with mitigation. 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 Environmental Impact Report (GPU 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.

The Project site is located southeast of the intersection of San Pasqual Valley Road (SR-78) and Idaho Avenue, within the North County Metropolitan Subregional Plan Area in the unincorporated County of San Diego. No RCAs established for protecting visual resources as identified by the County of San Diego General Plan or North County Metropolitan Subregional Plan exist within the vicinity of the Project site.

Additionally, no trail systems or public parks would provide topographically accessible views to the Project. The Project site is located 2.9 miles from the proposed San Dieguito River Park Trail, which would not afford any views of the Project site due to distance and intervening topography and land uses. Additionally, the San Dieguito River Park Trail has

not yet been established, and therefore the Project would not detract from existing views from an adopted County or State trail system.

As previously discussed, the GPU EIR determined impacts on scenic vistas to be less than significant with mitigation. As the proposed Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 1(b) The GPU EIR concluded this impact to be less than significant with mitigation. 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 within the vicinity of a State Designated Scenic Highway, however the County General Plan identifies roadways that are designated as scenic corridors within the Conservation and Open Space Element and have been included as part of the County Scenic Highway System. Designated scenic roadways located in the vicinity of the project site include Bear Valley Parkway, located 0.3 miles to the east of the project site, and San Pasqual Valley Road, located 0.5 miles to the southeast of the project site. Direct views to the project site are minimal and brief, and would not substantially obstruct, interrupt, or detract from an existing scenic vista. Additionally, the Project would be consistent with surrounding single-family residential land uses.

As previously discussed, the GPU EIR determined impacts on scenic resources to be less than significant with mitigation. As the proposed Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 1(c) The GPU EIR concluded this impact to be significant and unavoidable. 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 project site is within a semi-rural area of unincorporated Escondido, located southeast of the intersection of San Pasqual Valley Road (SR-78) and Idaho Avenue, and within one-quarter mile of the municipal boundary of the City of Escondido. The existing visual character and quality of the Project surroundings are characterized as semi-rural and village single-family residential and civic land use types with relatively flat to moderately sloped grades.

The proposed Project would not detract from, or contrast with the existing visual character and/or quality of the surrounding areas for the following reasons: consistency with the General Plan density allowance on-site, conformance with the North County Metropolitan Subregional Plan and location of the site within a residentially developed area.

Additionally, the location, size, and design of the proposed use would be compatible with uses in the immediate area. The proposed development is similar to surrounding single-family residential use types.

As previously discussed, the GPU EIR determined impacts on visual character or quality to be significant and unavoidable. However, the Project would have a less-than-significant impact with no required mitigation for the reasons detailed above. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 1(d) The GPU EIR concluded this impact to be significant and unavoidable. The proposed Project will use outdoor lighting and is located within Zone B as identified by the San Diego County Light Pollution Code, approximately 40 miles from the Mount Laguna Observatory and approximately 17 miles from Palomar Observatory. However, the Project will not adversely affect nighttime views or astronomical observations, because the Project will conform to the Light Pollution Code (Section 51.201-51.209), including the Zone B lamp type and shielding requirements per fixture and hours of operation limitations for outdoor lighting and searchlights. The code was developed by the County in cooperation with the lighting engineers, astronomers, and other experts to effectively address and minimize the impact of new sources light pollution on nighttime views. Compliance with the Code would be required prior to issuance of a building permit. Thus, the proposed Project would not create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area.

As previously discussed, the GPU EIR determined impacts from light or glare to be significant and unavoidable. However, the proposed Project would have a less-than-significant impact with no required mitigation for the reasons detailed above. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

**Conclusion**

With regards to the issue area of Aesthetics, the following findings can be made:

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. No mitigation measures contained within the GPU EIR would be required because Project specific impacts would be less than significant.

<b>Significant Project Impact</b>	<b>Impact not identified by GPU EIR</b>	<b>Substantial New Information</b>
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**2. Agriculture/Forestry Resources**

– Would the Project:

a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance as shown on the maps prepared pursuant to the Farmland Mapping and

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Monitoring Program of the California Resources Agency, or other agricultural resources, to a non-agricultural use?

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

c) Conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production?

d) Result in the loss of forest land, 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?

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?

**Discussion**

2(a) The GPU EIR concluded this impact to be significant and unavoidable. A Local Agricultural Resource Assessment (LARA) Model was prepared for the Project by County Agricultural Resources Specialist dated June 21, 2021 which analyzed agricultural resources on the project site. Based on the County of San Diego Geographical Information System and aerial imagery, the site has been mapped “other land” by the Department of Conservation, Farmland Mapping and Monitoring Program (FMMP) and is not considered an important agricultural resource. However, FMMP mapped “Prime Soils” and County Farmland of Statewide Importance Soil Candidates are underlain on a portion of the project site. The following soils were identified on-site:

- Ramona Sandy Loam, 2 to 5% slopes (RaC) – 8.98 acres
- Fallbrook-Vista Sandy Loam, 15 to 30% slopes (FvE) – 1.30 acres

Prime soils mapped by the FMMP cover approximately 6.86 acres of the site, while RaC, a County-candidate soil, covered approximately 8.98 acres of the project site. The remainder of the site is FvE, which is not considered a prime soil mapped by the FMMP nor are considered a County-candidate soil.

Based on the results of the Local Agricultural Resources Assessment (LARA) Model, the site is not considered an important agricultural resource. The site received a low rating for water and land use consistency, and a moderate rating for soil quality and surrounding land use. The site received a high rating for climate and slope. To be considered an important agricultural resource under the LARA model, a water rating of high must be present. Therefore, the site’s low water rating means that the site is not an important agricultural resource.

As previously discussed, the GPU EIR determined impacts from direct and indirect conversion of agricultural resources to be significant and unavoidable. However, the proposed Project would have a less than significant direct and indirect impact for the



reasons detailed above. Therefore, the Project would be consistent with the analysis provided within the GPU EIR.

- 2(b) The GPU EIR concluded this impact to be less than significant with mitigation. The GPU The project site is zoned A70, limited agricultural, however, as mentioned above in response 2(a), the project site would not be considered a viable agricultural resource due to the lack of water resources on site. The nearest lands under Williamson Act Contract or in an agricultural preserve are located approximately 0.7-miles east of the project site. Due to distance, no land-use interface conflicts would occur. Additionally, the Project is for the development of a residential subdivision, which is compatible with the surrounding residential and civic use types. Therefore, the Project would not conflict with existing zoning for agricultural use or a Williamson Act Contract.

As previously discussed, the GPU EIR determined impacts from land use conflicts to be less than significant with mitigation. As the proposed Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 2(c) The GPU EIR concluded this impact to be significant and unavoidable. 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. The outer edge of the Cleveland National Forest is located approximately 9.5 miles to the east of the project site. Thus, due to distance, the Project would have no impact on the Forest. In addition, the County of San Diego does not have any existing Timberland Production Zones.

As previously discussed, the GPU EIR determined impacts from direct and indirect conversion of agricultural resources (including forest resources), to be significant and unavoidable. However, the Project would have a less-than-significant impact to forest resources. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 2(d) The GPU EIR concluded this impact to be significant and unavoidable. As indicated in response 2(c), the Project site, or any off-site improvements, are not located near any forest lands. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 2(e) The GPU EIR concluded this impact to be significant and unavoidable. As mentioned above in responses 2(a) and 2(b), the site is undeveloped with no active agricultural use types. The Project site is zoned A70, limited agricultural, however, as mentioned above in response 2(a), the Project site would not be considered a viable agricultural resource due to the lack of water resources on site.

Active agricultural operations (row crops) exist approximately 1.5 miles east of the project site. However, due to distance, no indirect impacts would occur.

As previously discussed, the GPU EIR determined impacts from direct and indirect conversion of agricultural resources (including forest resources) to be significant and unavoidable. However, the proposed Project determined impacts to agricultural resources to be less-than-significant. Therefore, the Project would be consistent with the analysis

provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

**Conclusion**

With regards to the issue area of Agricultural/Forestry Resources, the following findings can be made:

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. No mitigation measures contained within the GPU EIR would be required because Project specific impacts would be less than significant

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
<b>3. Air Quality</b> – 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"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) 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 (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Discussion**

An Air Quality Assessment was prepared for the Project by Ldn Consulting, Inc. dated May 26, 2021

3(a) The GPU EIR concluded this impact to be less than significant. An Air Quality Assessment was prepared by Jeremy Loudon, Ldn Consulting, Inc. dated May 26, 2021 (included in Appendix A). The General Plan designates the Project site as Village (VR-2) Residential. The Project proposes to build 20 single-family residential dwelling units. This would be consistent with the General Plan land use designation and density. Because the proposed Project is allowed under the General Plan land use designation, which is used in San

Diego Association of Governments' (SANDAG's) growth projections, it is consistent with San Diego County Air Pollution Control District's (SDAPCD's) Regional Air Quality Strategy (RAQS) and portions of the State Implementation Plan (SIP). As such, the Project would not conflict with either the RAQS or the SIP. In addition, the construction and operational emissions from the Project would be below established screening-level thresholds (SLTs), as addressed under Question 3(b), and would not violate any ambient air quality standards.

As previously discussed, the GPU EIR determined impacts on air quality plans to be less than significant. As the proposed Project would have a less-than-significant for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 3(b) The GPU EIR concluded impacts to be significant and unavoidable. In general, air quality impacts from land use projects are the result of emissions from area sources (landscaping and consumer products), energy (natural gas), transportation (on-road mobile sources), and short-term construction activities. The County of San Diego (County) has identified significance SLTs which incorporate SDAPCD's established air quality impact analysis trigger levels for all new source review (NSR) 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 and fugitive emissions, as well as emissions from mobile sources) would not result in a significant impact to air quality. SLTs for volatile organic compounds (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 and SDAPCD's trigger levels were developed in support of State and federal ambient air quality standards that are protective of human health.

The Project proposes to build 20 single-family residential dwelling units. Construction of the Project is expected to begin early 2022 and be completed in 2023. The first year of full operations would be expected in 2024. Emissions generated during construction activities would be temporary and localized. Earthwork activities during construction of the Project would require 16,200 cubic yards of soil import. Construction activities would be subject to the County of San Diego Grading Ordinance and SDAPCD Rule 55 to reduce fugitive dust. To further reduce potential impacts generated during the construction phase, the Project would require all construction equipment used during grading and site preparation activities to employ EPA certified Tier 4 engines with diesel particulate filters (DPF) as mitigation. This mitigation measure was identified by the GPU EIR Mitigation Measure 2.5 which requires additional control measures for projects that exceed SLTs. With the application of fugitive dust control measures, emissions of criteria air pollutants during construction activities would be below the County SLTs (see Appendix A). According to the County of San Diego's Operational Phase Air Quality Study Trigger Criteria, the proposed Project would not result in development that would exceed the trigger level for a single-family residential land use<sup>1</sup> for operational emissions and would not result in emissions that exceed the County's SLTs,

Project construction emissions associated with the proposed residential development are not anticipated to exceed the County's construction and operational SLTs, based on the

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<sup>1</sup> County of San Diego. 2007. County of San Diego, Guidelines for Determining Significance and Report Format and Content Requirements, Air Quality. Available: <https://www.sandiegocounty.gov/content/dam/sdc/pds/ProjectPlanning/docs/AQ-Report-Format.pdf>. Accessed June 22, 2021.

analysis presented in the Air Quality Assessment (Appendix A). Therefore, the Project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to air quality violations. The Project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation and would not result in an impact that was not previously identified in the GPU EIR with the incorporation of mitigation consistent with GPU EIR measure Air-2.6.

### Project Mitigation

#### **Tier 4 Construction Equipment and Diesel Particulate Filters**

All diesel-powered equipment will be equipped with engines that meet or exceed either EPA or California Air Resources Board (CARB) Tier 4 off-road with DPF emissions standards for particulate matter exhaust. An exemption from the Tier 4 with DPF requirement may be granted by the County in the event that the Developer documents that equipment with the required tier is not reasonably available and corresponding reductions in criteria air pollutant emissions are achieved from another construction equipment. Before an exemption may be considered by the County, the Developer shall be required to demonstrate that three construction fleet owners/operators in the San Diego region were contacted and that those owners/operators confirmed Tier 4 Final equipment with DPF could not be located within the San Diego region.

- 3(c) The GPU EIR concluded this impact to be significant and unavoidable. San Diego County is presently in non-attainment for the National and California Ambient Air Quality Standard (NAAQS and CAAQS, respectively) for ozone (O<sub>3</sub>). San Diego County is also presently in non-attainment for concentrations of Particulate Matter less than or equal to 10 microns (PM<sub>10</sub>) and Particulate Matter less than or equal to 2.5 microns (PM<sub>2.5</sub>) under the CAAQS. O<sub>3</sub> is formed when VOCs and oxides of nitrogen (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. 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.

The Project would contribute PM<sub>10</sub>, PM<sub>2.5</sub>, NO<sub>x</sub>, and VOC emissions from construction/grading activities; however, it would not exceed established SLTs (see Question 3(b) above). Additionally, grading and all other construction activities would be subject to the County of San Diego Grading Ordinance and SDAPCD Rule 55, which require the implementation of dust control measures. Additionally, Tier 4 construction equipment with DPF or equivalent will be used in for the construction activity. The Project would generate PM<sub>10</sub>, PM<sub>2.5</sub>, and NO<sub>x</sub> emissions during Project operations primarily from mobile sources (i.e., vehicle trips), and VOCs from area and mobile sources. However, the proposed Project does not exceed the County's Operational Phase Air Quality Study Trigger Criteria for operational emissions and therefore would not result in emissions that exceed the County's SLTs.<sup>2</sup>

<sup>2</sup> County of San Diego. 2007. County of San Diego, Guidelines for Determining Significance and Report Format and Content Requirements, Air Quality. Available: <https://www.sandiegocounty.gov/content/dam/sdc/pds/ProjectPlanning/docs/AQ-Report-Format.pdf>. Accessed June 22, 2021.

Cumulative impacts could occur if the most intensive phases of construction for the proposed Project occur simultaneously with other intensive phases of proposed projects in close proximity. The most intensive construction phase for the Project and for typical developments occurs during earthwork and grading activities. During these phases, the primary criteria air pollutant of concern would be PM<sub>10</sub>. As discussed in the Air Quality Assessment (Appendix A), zero cumulatively considerable projects exist within a 0.5 mile radius from the Project site. In addition, the Project's estimated emissions of criteria air pollutants, specifically PM<sub>10</sub>, was estimated to be 18 lb/day (Appendix A) which would be relatively low compared to the County's SLTs of 100 lb/day during construction activities. Further, due to the highly dispersive nature of particulate matter, a cumulative impact during construction activities would only occur if a project adjacent to the proposed Project undergoes simultaneous grading/earthwork activities and emits significantly greater PM<sub>10</sub> emissions than the Project. Because all projects developed within the County would be required to comply with the County Grading Ordinance and SDAPCD Rule 55, this scenario is not anticipated to occur.

The Project is proposing development that is consistent with the County's General Plan, thus operational air emissions are considered to have been accounted for in the GPU EIR. The RAQS and SIP were prepared consistent with growth forecasts in the General Plan. Further, as described under Question 3(b), Project construction and operations would not result in emissions of criteria air pollutants greater than the County's SLTs. Thus, the Project would not result in a cumulatively considerable net increase in criteria air pollutants for which the region is currently in non-attainment.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to non-attainment criteria air pollutants. However, the Project would have a less than significant impact to non-attainment criteria air pollutants for the reasons stated above. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts or result in new impacts not identified within the GPU EIR.

- 3(d) The GPU EIR concluded this impact to be significant and unavoidable. Air quality regulators typically define sensitive receptors as schools (Preschool – 12<sup>th</sup> Grade), hospitals, resident care facilities, day-care centers, residences, or other facilities that may house individuals with health conditions that would be adversely impacted by changes in air quality. Because the Project proposes residential land uses, the proposed Project would not be considered a point-source of significant emissions. The nearest sensitive receptors to the Project site are existing residential dwelling units and schools located adjacent to the Project site boundaries. The Project would generate construction emissions in the vicinity of sensitive receptors.

Diesel particulate matter (DPM) is the primary toxic air contaminant (TAC) of concern and is generated from fuel consumption in heavy construction equipment. From the health risk assessment in the air quality study, it was found that significant cancer health risks could be tied to construction and therefore would require mitigation to comply. Using Tier 4 construction equipment with DPF would reduce cancer risks to less than significant at all receptors surrounding the Project site. Abidance to the County of San Diego Grading Ordinance, SDAPCD Rule 55, the application of Tier 4 engines with DPF as mitigation, and to a confined construction schedule would reduce emissions and exposure to construction emissions would be temporary and would not expose sensitive receptors to excessive concentrations of air pollutants. The County's SLTs for human health hazards

were developed in support of State and federal ambient air quality strategies that are protective of human health.

As discussed in Question 3(b), according to the County of San Diego's Operational Phase Air Quality Study Trigger Criteria, the proposed Project would not result in development that would exceed the trigger criteria for a single-family residential land use for operational emissions and would not result in emissions that exceed the County's SLTs or health risk,

Furthermore, as indicated in Question 3(b), NAAQS and CAAQS would not be exceeded due to project contributions for both operations and construction and would not expose sensitive receptors to an incremental health risk. In addition, the implementation of Tier 4 construction equipment with DPF as mitigation would reduce onsite PM<sub>10</sub> from construction exhaust emissions (i.e., DPM), reducing inhalation cancer risk to a less than significant level.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to sensitive receptors. However, the Project would have a less than significant impact to sensitive receptors. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 3(e) The GPU EIR concluded this impact to be less than significant. The Project could produce objectionable odors during the construction phases of paving and painting activities which would require bitumen and solvents from the placement of hot asphalt and architectural coating. Exhaust from construction equipment may also generate odors. However, due to the dispersive nature of odors, these short-term 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 result in the future development of residential uses which are not generally associated with the generation of objectionable odors. Thus, the Project would not create objectionable odors affecting a substantial number of people during construction activities or operations.

As previously discussed, the GPU EIR determined less than significant impacts from objectionable odors. As the Project would have a less than significant impact from objectionable odors for the reasons stated above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

## Conclusion

With regards to the issue area of Air Quality, the following findings can be made:

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.

4. Feasible mitigation measures contained within the GPU EIR (Air-2.6) would be applied to the Project.

<b>Significant Project Impact</b>	<b>Impact not identified by GPU EIR</b>	<b>Substantial New Information</b>
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**4. Biological Resources** – Would the Project:

a) Have a substantial adverse effect, either directly or through habitat modifications, on any candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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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?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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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?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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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?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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**Discussion**

A Biological Resources Letter Report was prepared for the Project by LSA dated February 2021.

- 4(a) The GPU EIR concluded this impact to be significant and unavoidable. Biological resources on the project site were evaluated in a Biological Resource Letter Report prepared by LSA, dated February 2021. The site contains non-native grassland, walnut woodland, and eucalyptus woodland habitat. No sensitive wildlife or plant species were identified on site. As a result of this Project, impacts will occur to 9.1 acres of non-native grassland, 0.035 acres of walnut woodland, and 0.3 acres of eucalyptus woodland. The site is located within the County’s draft North County MSCP in land designated as land Outside the Pre-approved Mitigation Area (PAMA).

As considered by the GPU EIR, project impacts to sensitive habitat and/or species will be mitigated through ordinance compliance and through implementation of the following mitigation measures: preservation of 4.6 acres of non-native grassland habitat within a County approved mitigation bank, the preservation of 0.4 acres of walnut woodland within an onsite open space easement, the dedication of an onsite open space easement over 0.8 acres of non-native grassland and 0.2 acres of eucalyptus woodland habitat in order to achieve avoidance, implementation of preconstruction bat surveys to avoid impacts to foliage-roosting bats, and breeding season avoidance to prevent brushing, clearing, and/or grading between February 1 and August 31. The GPU EIR identified these mitigation measures as Bio-1.6 and Bio-1.7.

As previously discussed, the GPU EIR determined impacts to special status species as significant and unavoidable. The Project impacts were also determined to be potentially significant. However, the proposed Project would incorporate the GPU EIR mitigation measures Bio-1.6 and Bio-1.7 for a less than significant impact with mitigation. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 4(b) The GPU EIR concluded this impact to be significant and unavoidable. Based on the Biological Resource Letter Report, the project site contains four ephemeral drainage features subject to the Regional Water Quality Control Board (RWQCB) and California Department of Fish and Wildlife (CDFW) jurisdiction. The following sensitive habitats were identified on the site: non-native grassland and walnut woodland. As detailed in response a) above, direct and indirect impacts to sensitive natural communities identified in the RPO, NCCP, Fish and Wildlife Code, and Endangered Species Act are mitigated through implementation of mitigation.

As considered by the GPU EIR, project impacts to sensitive habitats will be mitigated through ordinance compliance and through implementation of the following mitigation measures: preservation of 4.6 acres of non-native grassland habitat within a County approved mitigation bank, the preservation of 0.4 acres of walnut woodland within an onsite open space easement, the dedication of an onsite open space easement over 0.8 acres of non-native grassland and 0.2 acres of eucalyptus woodland habitat in order to achieve avoidance, implementation of preconstruction bat surveys to avoid impacts to foliage-roosting bats, and breeding season avoidance to prevent brushing, clearing, and/or grading between February 1 and August 31. The GPU EIR identified these mitigation measures as Bio-1.6 and Bio-1.7.

As previously discussed, the GPU EIR determined impacts to riparian habitat and other sensitive natural communities as significant and unavoidable. The Project impacts were also determined to be potentially significant. However, the proposed Project would incorporate the GPU EIR mitigation measures Bio-1.6 and Bio-1.7 for a less than significant impact with mitigation. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 4(c) The GPU EIR concluded this impact to be less than significant with mitigation. The proposed project site contains four ephemeral drainage features subject to the Regional Water Quality Control Board (RWQCB) and California Department of Fish and Wildlife (CDFW) jurisdiction. Impacts will occur to 0.024 acres of jurisdictional waters. Mitigation, including obtaining appropriate permits and acquisition of offsite mitigation bank credits,



will be implemented. The GPU EIR identified these mitigation measures as Bio-1.5, Bio-1.6, and Bio-2.3

As previously discussed, the GPU EIR determined impacts to federally protected wetlands as less than significant with mitigation. The Project determined impacts to federally protected wetlands to be less than significant with the incorporation of Project conditions for the dedication of an on-site biological open space easement consistent with GPU EIR mitigation measures Bio-1.5, Bio-1.6 and Bio-2.3. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 4(d) The GPU EIR concluded this impact to be significant and unavoidable. Based on a GIS analysis, the County's Comprehensive Matrix of Sensitive Species, and a Biological Resource Letter Report, it was determined that the site is not part of a regional linkage/corridor as identified on MSCP maps nor is it in an area considered regionally important for wildlife dispersal. The site would not assist in local wildlife movement as it lacks connecting vegetation and visual continuity with other potential habitat areas in the general project vicinity.

As previously discussed, the GPU EIR determined impacts to wildlife movement corridors as significant and unavoidable. However, the proposed Project would have a less-than-significant impact with no required mitigation for the reasons detailed above. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 4(e) The GPU EIR concluded this impact to be less than significant. The Project is located within the draft North County Multiple Species Conservation Program (MSCP) and outside of the South County MSCP. Therefore, it does not require conformance with the Biological Mitigation Ordinance (BMO). The Project is consistent with the County's Guidelines for Determining Significance for Biology, the Resource Protection Ordinance (RPO), and the Migratory Bird Treaty Act (MBTA) with the implementation of mitigation. The Project will not 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. As the proposed Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

## Conclusion

With regards to the issue area of Biological Resources, the following findings can be made:

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.

4. Feasible mitigation measures contained within the GPU EIR (Bio-1.5, Bio-1.6, Bio-1.7, and Bio-2.3) would be applied to the Project.

Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
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**5. Cultural Resources** – Would the Project:

- |  |                          |                          |                          |
|--|--------------------------|--------------------------|--------------------------|
| a) Cause a substantial adverse change in the significance of a historical resource as defined in 15064.5?    | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to 15064.5? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c) Directly or indirectly destroy a unique geologic feature?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| d) Directly or indirectly destroy a unique paleontological resource or site?                                 | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| e) Disturb any human remains, including those interred outside of formal cemeteries?                         | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

**Discussion**

The following technical studies were prepared for the Project:

1. Negative Cultural Resources Survey Report, prepared by Natalie Brodie, dated March 17, 2021

5(a) The GPU EIR concluded this impact to be less than significant with mitigation. Based on an analysis of records and a survey of the property by County approved archaeologist, Natalie Brodie, it has been determined that there are no impacts to historical resources because they do not occur within the project site. The results of the survey are provided in the cultural resources report titled, *Negative Cultural Resources Survey Report*, prepared by Natalie Brodie, dated March 17, 2021.

As previously discussed, the GPU EIR determined impacts on historic resources to be less than significant with mitigation. The proposed Project determined impacts on historic resources to be less than significant. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

5(b) The GPU EIR concluded this impact to be less than significant with mitigation. Based on an analysis of records and a survey of the property by County approved archaeologist, Natalie Brodie, it has been determined that there are no impacts to archaeological resources because they do not occur within the project site. A Native American Monitor from the Santa Ysabel Reservation was present during the pedestrian survey. The Native American monitor had no concerns about the Project, and a letter summarizing the observations and comments from Misschief Cultural Monitoring, Inc. is included as an attachment to the cultural study.

Tribal outreach was conducted by the County for the purpose of Native American consultation. Tribal outreach to seventeen tribes (Barona, Campo, Ewiiapaayp, Inaja, Jamul, Kwaaymii, La Posta, Manzanita, Mesa Grande, Pala, Pechanga, Rincon, San Pasqual, Santa Ysabel, Soboba, Sycuan, and Viejas) was initiated on August 11, 2020.

Six tribes (Jamul, Pala, Pechanga, San Pasqual, Sycuan, and Viejas) responded. Jamul deferred to San Pasqual and consultation was concluded. Formal consultation was conducted with the balance of tribes. The tribes requested that the Project be conditioned with a treatment agreement and preservation plan, and archaeological and tribal monitoring during consultation due to the sensitivity of the area. No Tribal Cultural Resources (TCRs) were identified during consultation.

As considered by the GPU EIR, potential impacts to cultural resources will be mitigated through ordinance compliance and through implementation of the following mitigation measures: Treatment Agreement and Preservation Plan, grading monitoring under the supervision of a County-approved archaeologist and a Native American monitor and conformance with the County's Cultural Resource Guidelines if resources are encountered. The GPU EIR identified these mitigation measures as Cul-2.5. The Project will be conditioned with archaeological and tribal monitoring (Cul-2.5) that includes the following requirements:

### Pre-Construction

Contract with a County approved archaeologist and Luiseno Native American monitor to perform archaeological monitoring and a potential data recovery program during all earth-disturbing activities. The Project Archaeologist and Luiseno Native American monitor shall perform the monitoring duties before, during and after construction.

Pre-construction meeting to be attended by the Project Archaeologist and Kumeyaay and Luiseno and Kumeyaay Native American monitor (Native American monitor) to explain the monitoring requirements.

### Construction

Monitoring. Both the Project Archaeologist and Luiseno Native American monitor are to be onsite during earth disturbing activities. The frequency and location of monitoring of native soils will be determined by the Project Archaeologist in consultation with the Luiseno Native American monitor. Both the Project Archaeologist and Luiseno Native American monitor will evaluate fill soils to ensure that they are negative for cultural resources

If cultural resources are identified:

- Both the Project Archaeologist and Luiseno Native American monitor have the authority to divert or temporarily halt ground disturbance operations in the area of the discovery.
- The Project Archaeologist shall contact the County Archaeologist and the culturally-affiliated tribes as identified in the Treatment Agreement and Preservation Plan at the time of discovery.
- All ground disturbance activities within 100 feet of the discovered cultural resources shall be halted until a meeting is convened between the developer, the project archaeologist, tribal monitor(s), and the tribal representative(s) to discuss the significance of the find. Optionally, the County Archaeologist may attend the meeting to discuss the significance of the find.
- All ground disturbance activities within 100 feet of the discovered cultural resources shall be halted until a meeting is convened between the developer, the project archaeologist, tribal monitor(s), and the tribal representative(s) to discuss the significance of the find. Optionally, the County Archaeologist may attend the meeting to discuss the significance of the find.

- Construction activities shall not resume in the area of discovery until an agreement has been reached by all parties as to appropriate mitigation. Work shall be allowed to continue outside of the buffer area and shall be monitored. Isolates and non-significant deposits shall be minimally documented in the field. The isolates and non-significant deposits shall be reburied onsite as identified in the Treatment Agreement and Preservation Plan.
- Treatment and avoidance of the newly discovered resources shall be consistent with the Treatment Agreement and Preservation Plan (CUL-2) entered into with the appropriate tribes. This may include avoidance of the cultural resources through project design, in-place preservation of cultural resources located in native soils and/or re-burial on the Project property so they are not subject to further disturbance in perpetuity.
- If cultural resources are identified, one or more of the following treatments, in order of preference, shall be employed:
  - Preservation in place of the Cultural Resources, if feasible. Preservation in place means avoiding the resources, leaving them in place where they were found with no development affecting the integrity of the resources.
  - Reburial of the resources on the project property. The measures for reburial shall include, at least, the following:
    - Measures and provisions to protect the future reburial area from any future impacts in perpetuity.
    - Reburial shall not occur until all legally required cataloging and basic recordation have been completed, with an exception that sacred items, burial goods and Native American human remains are excluded.
    - Any reburial process shall be culturally appropriate.
    - Listing of contents and location of the reburial shall be included in the confidential appendix of the Monitoring Report.
    - The Monitoring Report shall be filed with the County under a confidential cover and is not subject to Public Records Requests.
  - If preservation in place or reburial is not feasible, a Research Design and Data Recovery Program (Program) shall be prepared by the Project Archaeologist in consultation with the Tribe and Luiseno Native American Monitor and approved by the County Archaeologist prior to implementation. There shall be no destructive or invasive testing on sacred items, burial goods and Native American human remains. Results concerning finds of any inadvertent discoveries shall be included in the Monitoring Report.
  - Pursuant to Calif. Pub. Res. Code § 21083.2(b) avoidance is the preferred method of preservation for archaeological resources and cultural resources. If the landowner and the Tribe(s) cannot agree on the significance or the mitigation for the archaeological or cultural resources, these issues will be presented to the Planning & Development Services Director for decision. The Planning & Development Services Director shall make the determination based on the provisions of the California Environmental Quality Act with respect to archaeological resources, recommendations of the project archeologist and shall take into account the cultural and religious principles and practices of the Tribe.

#### Human Remains.

- The Property Owner or their representative shall contact the County Coroner and the PDS Staff Archaeologist.

- Upon identification of human remains, no further disturbance shall occur in the area of the find until the County Coroner has made the necessary findings as to origin. If the human remains are to be taken offsite for evaluation, they shall be accompanied by the Native American monitor.
- If the remains are determined to be of Native American origin, the Most Likely Descendant (MLD), as identified by the Native American Heritage Commission (NAHC), shall be contacted by the Property Owner or their representative in order to determine proper treatment and disposition of the remains.
- The immediate vicinity where the Native American human remains are located is not to be damaged or disturbed by further development activity until consultation with the MLD regarding their recommendations as required by Public Resources Code Section 5097.98 has been conducted.
- Public Resources Code §5097.98, CEQA §15064.5 and Health & Safety Code §7050.5 shall be followed in the event that human remains are discovered.

### Rough Grading

Monitoring Report. Upon completion of Rough Grading, a monitoring report shall be prepared identifying whether resources were encountered. A copy of the monitoring report shall be provided to the South Coastal Information Center and any culturally-affiliated tribe who requests a copy. The report shall detail all cultural artifacts and deposits discovered during monitoring and the anticipated time schedule for completion of the reburial and/or repatriation phase of the monitoring.

### Final Grading

- Final Report.
  - A final report shall be prepared substantiating that earth-disturbing activities are completed and whether cultural resources were encountered. A copy of the final report shall be submitted to the South Coastal Information Center, and any culturally-affiliated tribe who requests a copy.
- Cultural Material Conveyance
  - The final report shall include evidence that all Native American cultural materials have been conveyed, in order of preference, as follows:
    - Evidence that all prehistoric materials have been reburied onsite.
    - Evidence that all prehistoric materials have been repatriated to a Native American group of appropriate tribal affinity.
  - The final report shall include evidence that all historic materials have been curated at a San Diego curation facility that meets federal standards per 36 CFR Part 79.

As previously discussed, the GPU EIR determined impacts to archaeological resources as less than significant with mitigation. The Project determined impacts to archaeological resources as potentially significant. However, the Project would incorporate the GPU EIR mitigation measure Cul-2.5 for a less than significant impact with mitigation. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 5(c) The GPU EIR concluded this impact to be less than significant. 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.

As previously discussed, the GPU EIR determined impacts on unique geologic features as less than significant. As the Project would have a less-than-significant impacts for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 5(d) The GPU EIR concluded this impact to be less than significant with mitigation. A review of the County’s Paleontological Resources Maps and data on San Diego County’s geologic formations indicates that the project is located on geological formations that do not contain unique paleontological resources. As such, mitigation (Cul-3.1) identified in the GPU EIR would not be required.

As previously discussed, the GPU EIR determined impacts on paleontological resources would be less than signfic as less than significant. As the Project would have a less-than-significant impacts for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 5(e) The GPU EIR concluded this impact to be less than significant with mitigation. Based on an analysis of records and archaeological surveys of the property, it has been determined that the project site does not include a formal cemetery or any archaeological resources that might contain interred human remains. Also see section 5(b) above for mitigation measures for inadvertent discoveries.

As previously discussed, the GU EIR determined impacts to human remains as less than significant with mitigation. The proposed Project determined impacts to human remains as less than significant. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

**Conclusion**

With regards to the issue area of cultural/paleontological resources, the following findings can be made:

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. Feasible mitigation measures contained within the GPU EIR (Cul-2.5), would be applied to the Project.

<b>Significant Project Impact</b>	<b>Impact not identified by GPU EIR</b>	<b>Substantial New Information</b>
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**6. Energy Use** – 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?

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

**Discussion**

Energy use was not specifically analyzed within the GPU EIR as a separate issue area under CEQA. At the time, Energy Use was contained within Appendix F of the CEQA Guidelines and since then has been moved to the issue areas within Appendix G of the CEQA Guidelines. However, the issue of energy use in general was discussed within the GPU and the GPU EIR. For example, within the Conservation and Open Space Element of the GPU, Goal COS-15 promotes sustainable architecture and building techniques that reduce emissions of criteria pollutants and GHGs, while protecting public health and contributing to a more sustainable environment. Policies, COS-15.1, COS-15.2, and COS-15.3 would support this goal by encouraging design and construction of new buildings and upgrades of existing buildings to maximize energy efficiency and reduce GHG. Goal COS-17 promotes sustainable solid waste management. Policies COS-17.1 and COS-17.5 would support this goal by reducing GHG emissions through waste reduction techniques and methane recapture. The analysis below specifically analyzes the energy use of the Project.

6(a) The Project would increase the demand for electricity and natural gas at the Project site, and gasoline consumption in the Project area during construction and operation relative to existing conditions. CEQA requires mitigation measures to reduce “wasteful, inefficient and unnecessary” energy usages (Public Resources Code Section 21100, subdivision [b][3]). Neither the law nor the State CEQA Guidelines establish criteria that define wasteful, inefficient, or unnecessary use. Compliance with the California Code of Regulations 2019 Title 24 Part 6 Building Code and 2019 Energy Efficiency Standards would result in highly energy-efficient buildings. However, compliance with building codes does not adequately address all potential energy impacts during construction and operation. It can be expected that energy consumption, outside of the building code regulations, would occur through the transport of construction materials to and from the site during the construction phase and the use of personal vehicles by residents.

Grading and Construction

During the grading and construction phases of the Project, the primary energy source utilized would be petroleum from construction equipment and vehicle trips. To a lesser extent, electricity would also be consumed for the temporary electric power for as-necessary lighting and electronic equipment. Activities including electricity would be temporary and negligible; therefore, electricity use during grading and construction would not result in wasteful, inefficient, or unnecessary consumption of energy. Any natural gas that may be consumed as a result of the Project construction would be temporary and negligible and would not have an adverse effect; therefore, natural gas used during grading and construction would also not result in wasteful, inefficient, or unnecessary consumption of energy.

The energy needs for the Project construction would be temporary and is not anticipated to require additional capacity or increase peak or base period demands for electricity or other forms of energy. Construction equipment use and associated energy consumptions would be typical of that associated with the construction of residential projects of this size in a semi-rural setting. Additionally, The Project is consistent with the General Plan and

Zoning Ordinance. Thus, the Project's energy consumption during the grading and construction phase would not be considered wasteful, inefficient, or unnecessary.

#### Operational

Operation of the Project would be typical of residential land uses requiring natural gas for space and water heating, and landscape maintenance activities. The Project would meet the California Code of Regulations Title 24 Standards and Energy Efficiency Standards for energy efficiency that are in effect at the time of construction. The Project would also comply with the County's Landscape Ordinance and the water use application using prescriptive compliance option to reduce overall water use onsite.

Over the lifetime of the proposed Project, fuel efficiency of vehicles is expected to increase as older vehicles are replaced with newer, more efficient models. As such, the amount of petroleum consumed as a result of vehicle trips to and from the Project site during operation would decrease over time. State and Federal regulations regarding standards for vehicles (e.g. Advanced Clean Cars Program, CAFÉ Standards) are designed to reduce wasteful, unnecessary, and inefficient use of fuel. The coupling of various State policies and regulations such as the Zero-Emission Vehicles Mandate and Senate Bill 350 would result in the deployment of electric vehicles which would be powered by an increasingly renewable electrical grid.

As previously discussed, the GPU EIR did not analyze Energy as a separate issue area under CEQA. Energy was analyzed under the GPU and GPU EIR and has been incorporated within General Plan Elements. The Project would not conflict with policies within the GPU related to energy use, nor would it result in the wasteful, inefficient, or unnecessary consumption of energy resources, as specified within Appendix G of the CEQA Guidelines.

6(b) Many of the regulations regarding energy efficiency are focused on increasing the energy efficiency of buildings and renewable energy generation, as well as reducing water consumption and reliance on fossil fuels. The proposed Project includes the following energy conservation measures:

- Compliance with County's Water Conservation in Landscaping Ordinance, demonstrating a 40% reduction in outdoor use which would reduce energy required for water conveyance;
- Install low flow indoor water fixtures in all residential units, reducing water consumption in associated energy required for water conveyance.
- Install at least one qualified energy efficient appliance in all residential units.
- Install tankless gas or electric water heaters in all residential units.
- Install photovoltaic (PV) solar panels on each residential unit.
- Install one rain barrel for each residential unit.

In addition, the Project would be consistent with energy reduction policies of the County General Plan including policies COS-14.1 and COS-14.3. Additionally, the Project would be consistent with sustainable development and energy reduction policies such as policy COS-15.4, through compliance with the most recent Title 24 standards Energy Efficiency Standards at the time of Project construction. Therefore, the proposed Project would implement energy reduction design features and comply with the most recent energy building standards consistent with applicable plans and policies. Therefore, the proposed Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency.



As previously discussed, the GPU EIR did not analyze Energy as a separate issue area under CEQA. Energy was analyzed under the GPU and GPU EIR and has been incorporated within General Plan Elements. The Project would not conflict with policies within the GPU related to energy use or conflict with or obstruct a state or local plan for renewable energy or energy efficiency as specified within Appendix G of the CEQA Guidelines.

**Conclusion**

With regards to the issue area of Energy, the following findings can be made:

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. No mitigation measures contained within the GPU EIR would be required because Project specific impacts would be less than significant.

**7. Geology and Soils – Would the Project:**

	<b>Significant Project Impact</b>	<b>Impact not identified by GPU EIR</b>	<b>Substantial New Information</b>
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: (i) rupture of a known earthquake fault, (ii) strong seismic ground shaking or seismic-related ground failure, (iii) liquefaction, and/or (iv) landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Discussion**

7(a)(i) The GPU EIR concluded this impact to be less than significant. The Project 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 Hazard Zones in California, or located on any known active, potentially active, or inactive fault traces. The nearest

Alquist-Priolo fault to the Project site is located approximately 23 miles to the east of the site.

- 7(a)(ii) The GPU EIR concluded this impact to be less than significant. To ensure the structural integrity of all buildings and structures, the Project must conform to the Seismic Requirements as outlined within the California Building Code. In addition, a geotechnical report with proposed foundation recommendation would be required to be approved before the issuance of a building permit. Therefore, compliance with the California Building Code and the County Building Code would ensure that the Project would not result in a significant impact.
- 7(a)(iii) The GPU EIR concluded this impact to be less than significant. The Project site is not within a "Potential Liquefaction Area" as identified by the County Guidelines for Determining Significance for Geologic Hazards. This indicates that liquefaction potential at the site is low. Additionally, the site is not underlain by poor artificial fill nor is it located within a floodplain. Therefore, impacts from the exposure of people or structures to adverse effects from a known area susceptible to ground failure, including liquefaction, would be less than significant. To ensure no impacts would occur, a geotechnical report would be required prior to ground disturbance activities as a standard condition of approval. The GPU EIR identified the standard condition of a geotechnical report within section 2.6.3.1, Federal, State and Local Regulations and Existing Regulatory Processes, Liquefaction.

#### Conditions of Approval

The following list includes the Project conditions of approval:

#### **Geotechnical Report**

- A California Certified Engineering Geologist shall complete a final soils report specific to the preliminary design of the proposed development and submit the final soils report to PDS. The findings shall be reviewed and approved by the Director of the County Department of Planning and Development Services or designee.

- 7(a)(iv) The GPU EIR concluded this impact to be less than significant. The site is located within a "Landslide Susceptibility Area" as identified in the County Guidelines for Determining Significance for Geologic Hazards and is considered to be Generally Susceptible. The Project site is relatively flat to moderately sloped and risks associated with ground movement hazards are low.

As previously discussed, the GPU EIR determined less than significant impacts from exposure to seismic-related hazards and soil stability. The proposed Project would have a less than significant impact with the incorporation of Project conditions for a geological soils report, as a standard condition of approval. The GPU EIR identified the standard condition of a geotechnical report within section 2.6.3.1, Federal, State and Local Regulations and Existing Regulatory Processes, Liquefaction. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 7(b) The GPU EIR concluded this impact to be less than significant. The soils on-site have been identified as alfisols that have a soil erodibility rating of severe. However, the Project will not result in substantial soil erosion or the loss of topsoil because the Project would be required to comply with the Watershed Protection Ordinance (WPO) and Grading Ordinance which will ensure that the Project will not result in any unprotected erodible

soils, will not significantly alter existing drainage patterns, and will not develop steep slopes. Additionally, the Project would be required to implement Best Management Practices (BMPs) per the Priority Development Project Storm Water Quality Management Plan to prevent fugitive sediment.

As previously discussed, the GPU EIR determined impacts from soil erosion and topsoil loss to be less than significant. As the Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 7(c) The GPU EIR concluded this impact to be less than significant. As indicated in response (a)(iv), the site is located within a "Landslide Susceptibility Area" as identified in the County Guidelines for Determining Significance for Geologic Hazards and is considered to be Generally Susceptible. The Project site is relatively flat to moderately sloped and risks associated with ground movement hazards are low. In order to assure that any proposed buildings are adequately supported, a Soils Engineering Report is required as part of the grading and building permit process. This Report would evaluate the strength of underlying soils and make recommendations on the design of building foundation systems. The Soils Engineering Report must demonstrate that a proposed building meets the structural stability standards required by the California Building Code. The report must be approved by the County prior to the issuance of a Building Permit. With this standard requirement, impacts would be less than significant.

As previously discussed, the GPU EIR determined impacts from soil stability to be less than significant. As the proposed Project would have a less-than-significant impact for the reasons listed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 7(d) The GPU EIR determined impacts from expansive soils to be less than significant. The project site is not underlain by expansive soils, however as a standard project condition, the Project would be required to submit a Soils Engineering Report by a California Certified Engineering Geologist prior to grading. The soils report is required to include a surficial stability analysis with design recommendations. All geotechnical recommendations provided in the soils report would be followed during grading and construction of the Project.

As previously discussed, the GPU EIR determined impacts from expansive soils to be less than significant. As the Project would have a less-than-significant impact with the incorporation of standard project conditions, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 7(e) The GPU EIR concluded this impact to be less than significant. The Project would rely on conventional leach lines or supplemental treatment systems which would require approval by the County Department of Environmental Health (DEH) prior to issuance of building permits for residential structures. As such, the Project would not place septic tanks or alternative wastewater disposal systems on soils incapable of adequately supporting the tanks or system.

As previously discussed, the GPU EIR determined impacts to wastewater disposal systems to be less than significant. As the proposed Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the

analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

**Conclusion**

With regards to the issue area of Geology and Soils, the following findings can be made:

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. No mitigation measures contained within the GPU EIR would be required because Project specific impacts would be less than significant by adhering to the Project conditions of approval, which are consistent with the GPU EIR.

**8. Greenhouse Gas Emissions** – Would the Project:

<b>Significant Project Impact</b>	<b>Impact not identified by GPU EIR</b>	<b>Substantial New Information</b>
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a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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**Analysis**

8(a) The GPU EIR concluded this impact to be less than significant with mitigation. Amendments to Section 15064.4 of the CEQA Guidelines were adopted to assist lead agencies in determining the significance of the impacts of GHG emissions. Section 15064.4 specifies that a lead agency “shall 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 also provides lead agencies with the discretion to determine whether to assess those emissions quantitatively or to rely on a qualitative analysis or performance-based standards.

Greenhouse Gas (GHG) Emissions result in an increase in the earth’s average surface temperature commonly referred to as global warming. This rise in global temperature is associated with long-term changes in precipitation, temperature, wind patterns, and other elements of the earth’s climate system, known as climate change. These changes are now broadly attributed to GHG emissions, particularly those emissions that result from the human production and use of fossil fuels.

GHGs include carbon dioxide, methane, halocarbons (HFCs), and nitrous oxide, among others. Human induced GHG emissions are a result of energy production and consumption, and personal vehicle use, among other sources.

Climate changes resulting from GHG emissions could produce an array of adverse environmental impacts including water supply shortages, severe drought, increased

flooding, sea level rise, air pollution from increased formation of ground level ozone and particulate matter, ecosystem changes, increased wildfire risk, agricultural impacts, ocean and terrestrial species impacts, among other adverse effects.

Utilizing the California Emissions Estimator Model (CalEEMod) model, which is the model commonly used to evaluate GHG impacts in CEQA, the Project is estimated to generate 295 metric tons of carbon dioxide equivalent (MTCO<sub>2e</sub>) per year during operations. Construction emissions are estimated to result in 19 MTCO<sub>2e</sub> per year when amortized over a 30-year timeframe (consistent with methodology from the SCAQMD). With construction, annual project GHG emissions were estimated to be 314 MTCO<sub>2e</sub> and would be reduced by 38 MTCO<sub>2e</sub> when accounting for sustainability measures, resulting in a total of 276 MTCO<sub>2e</sub>.

The proposed Project has incorporated the following design features to reduce the impacts associated with GHGs and will be conditioned to meet the most restrictive requirement standards in effect at the time of construction.

Project Design Features:

- Install photovoltaic (PV) solar panels on each residential unit;
- Plant two new trees per dwelling unit on-site;
- Reduce outdoor water consumption by 40 percent from the Maximum Applied Water Allowance;
- Install low-flow water fixtures;
- Install energy efficient appliances;
- Install tankless gas or electric water heaters in each residential unit;
- Install one rain barrel for each residential unit; and
- Divert 90 percent of inert and 70 percent of all other construction and demolition waste from a landfill;

Project design features are consistent with County General Plan mitigation measures CC-1.1, CC-1.11, CC-1.17 which encourage incentives for energy efficient development, implementation of the Ordinance Relating to Water Conservation for Landscaping, and implementation of a construction waste recycling program. The Project is consistent with the land uses evaluated in the General Plan, which analyzed the impacts of residential uses on the project site.

In addition, a screening threshold was used to illustrate that impacts from the Project would be less than significant for GHG emissions. In response to Assembly Bill (AB) 32, the California Air Pollution Control Officers Association (CAPCOA) white paper titled "CEQA & Climate Change: Evaluating and Addressing Greenhouse Gas Emissions from Projects Subject to the California Environmental Quality Act," provides a methodology used for jurisdictions across the state to identify a screening level for GHG emissions (CAPCOA 2008). The CAPCOA guidance states that projects should be screened to determine if their associated GHG emissions exceed 900 MTCO<sub>2e</sub>. The threshold was developed based on various land use densities and future discretionary project types to determine the size of projects that would likely have a less than cumulatively considerable contribution to climate change. The CAPCOA threshold was developed to ensure capture of 90 percent or more of likely future discretionary developments. The objective was to set the emissions threshold low enough to capture a substantial fraction of future development while setting the emission threshold high enough to exclude small development projects that would contribute a relatively small fraction of cumulative statewide GHG emissions.

Since adoption of this threshold, Senate Bill (SB) 32 was passed to set a revised statewide reduction target to reduce emissions to 40 percent below 1990 levels by year 2030.

As compared to similar mass emissions thresholds adopted by other regional air districts the CAPCOA 900 MTCO<sub>2</sub>e threshold is relatively conservative and could be used to support cumulative impact determination beyond 2020. In April 2020, the Sacramento Metropolitan Air Quality Management District (SMAQMD) published updated project screening levels and determined that projects estimated to generate less than 1,100 MTCO<sub>2</sub>e per year would not result in a significant, cumulative impact.<sup>3</sup> This threshold was developed to demonstrate compliance with the statewide reduction targets in 2030 and the threshold was determined by SMAQMD to capture 98 percent of total GHG emissions.

Thus, the CAPCOA threshold of 900 MTCO<sub>2</sub>e represents a more stringent screening level than has been approved by other air districts in compliance with 2030 statewide reduction targets. Also, as State legislative requirements such as Building Energy Efficiency Standards and transportation-related efficiency measures become increasingly more stringent over time, future project GHG emissions would be reduced helping to meet State emission reduction targets. As described previously, the Project would generate a total of 276 MTCO<sub>2</sub>e per year, which is well below both screening thresholds. However, the Project does not rely on the screening level thresholds to determine impact significance, rather to illustrate that the Project would not cause a significant direct or cumulative impact from GHG emissions due to the relatively small amount of GHG emissions during operation and construction.

As previously discussed, the GPU EIR determined impacts to be less than significant with mitigation. As the Project would have a less than significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 8(b) The GPU EIR concluded this impact to be less than significant. As described above, the Project would not result in a cumulatively considerable contribution to global climate change. As such, the Project would be consistent with County goals and policies included in the County General Plan that address GHG reductions. In addition, the Project includes design features that would further reduce GHG emissions.

The Project is consistent with the County's General Plan land use designation of Village Residential (VR-2). Through its goals, policies, and land use designations, the County's General Plan aims to reduce countywide GHG emissions. ~~Furthermore, the County's General Plan growth projections informed the development of the San Diego Association of Governments' (SANDAG's) San Diego Forward: the 2015 Regional Plan which is the region's 2050 Regional Transportation Plan and Sustainable Community Strategy (RTP/SCS). SANDAG's Regional Plan is the region's applicable plan for reducing GHG emissions and is consistent with State GHG emissions reductions goals set by the California Air Resources Board (CARB) under SB 375. Because the proposed Project is consistent with the General Plan land uses, it is also consistent with State GHG emission reduction targets as identified in the SANDAG RTP/SCS. The Project implements sustainable design features and would result in a less than significant impact from vehicle miles travelled. Therefore, the Project would not conflict with the recently adopted San Diego Association of Governments' (SANDAG) San Diego Forward: the 2021 Regional~~

<sup>3</sup> Sacramento Metropolitan Air Quality Management District (SMAQMD). 2020. Greenhouse Gas Thresholds for Sacramento County. Available: <http://www.airquality.org/LandUseTransportation/Documents/SMAQMDGHGThresholds2020-03-04v2.pdf>. Accessed. March 18, 2021.

Plan, which includes a Sustainable Communities Strategy (SCS) as required by Senate Bill 375. SANDAG is responsible, in part, for reducing GHG and VMT from cars and light-duty trucks. Because the Project would result in a less than significant VMT impact, it would help support the 2021 Regional Plan's goal to reduce VMT in the region.

Because the Project's proposed land uses are consistent with the County's General Plan land use designation, the Project would not conflict with the General Plan or SANDAG's Regional Plan and would not result in growth beyond what was assumed in the regional growth forecasts. Therefore, the Project's impacts related to GHG emissions would be less than significant.

As previously discussed, the GPU EIR determined impacts to applicable regulation compliance to be less than significant. As the proposed Project would have a less than significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

**Conclusion**

With regards to the issue area of Global Climate Change, the following findings can be made:

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. No mitigation measures contained within the GPU EIR would be required because Project specific impacts would be less than significant.

<b>Significant Project Impact</b>	<b>Impact not identified by GPU EIR</b>	<b>Substantial New Information</b>
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**9. 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"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 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"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 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   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

and, as a result, would it create a significant hazard to the public or the 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 for people residing or working in the project area?

e) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

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

g) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

h) 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?

**Discussion**

9(a) The GPU EIR concluded this impact to be less than significant. The Project would not create a significant hazard to the public or environment because it does not propose the storage, use, transport, emission, or disposal of Hazardous Substances, nor are Hazardous Substances proposed or currently in use in the immediate vicinity.

As previously discussed, the GPU EIR determined impacts from transport, use and disposal of hazardous materials and accidental release of hazardous materials to be less than significant. The proposed Project would have a less-than-significant impact with standard project conditions for structure and debris removal, and lead and asbestos surveys. The Project conditions are consistent with General Plan Policy S-11.4 as analyzed in the GPU EIR. Thus, for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

9(b) The GPU EIR concluded this impact to be less than significant. The Project is within one-quarter mile of an existing school, however the Project does not proposed any hazardous emissions or handling of hazardous or acutely hazardous materials or substances. substances. As previously discussed, the GPU EIR determined impacts from hazards to schools to be less than significant. As the proposed Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.



- 9(c) The GPU EIR concluded this impact to be less than significant. Based on a site visit and a comprehensive review of regulatory databases, the Project site has not been subject to a release of hazardous substances. 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), and is not on or within 1,000 feet of a Formerly Used Defense Site.

As previously discussed, the GPU EIR determined impacts from existing hazardous materials sites to be less than significant. As the proposed Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 9(d) The GPU EIR concluded this impact to be less than significant with mitigation. The Project is not located within an Airport Land Use Compatibility Plan (ALUCP), an Airport Influence Area, or a Federal Aviation Administration Height Notification Surface. Additionally, 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.

As previously discussed, the GPU EIR determined impacts on public airports to be less than significant. As the proposed Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 9(e) The GPU EIR concluded this impact to be less than significant with mitigation. The proposed Project is not within one mile of a private airstrip. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 9(f)(i) OPERATIONAL AREA EMERGENCY PLAN AND MULTI-JURISDICTIONAL HAZARD MITIGATION PLAN:

The GPU EIR concluded this impact to be less than significant with mitigation. The Project would not interfere with this plan because it would not prohibit subsequent plans from being established or prevent the goals and objectives of existing plans from being carried out.

- 9(f)(ii) SAN DIEGO COUNTY NUCLEAR POWER STATION EMERGENCY RESPONSE PLAN:  
The property is not within the San Onofre emergency planning zone.

- 9(f)(iii) OIL SPILL CONTINGENCY ELEMENT:  
The Project is not located along the coastal zone.

- 9(f)(iv) EMERGENCY WATER CONTINGENCIES ANNEX AND ENERGY SHORTAGE RESPONSE PLAN:

The Project would not alter major water or energy supply infrastructure which could interfere with the plan.

- 9f)(v) **DAM EVACUATION PLAN:** The Project is not located within a dam inundation zone. Additionally, the development would not constitute a “Unique Institution” such as a hospital, school, or retirement home pursuant to the Office of Emergency Services included within the County Guidelines for Determining Significance, Emergency Response Plans. Therefore, the proposed Project would not impair implementation of or physically interfere with an adopted dam evacuation plan.

As previously discussed, the GPU EIR determined impacts from emergency response and evacuation plans to be less than significant with mitigation. As the Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 9(g) The GPU EIR concluded this impact as significant and unavoidable. The proposed Project is adjacent to wildlands that have the potential to support wildland fires. However, 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. Implementation of these fire safety standards will occur during the Major Grading Permit and/or building permit process. Therefore, based on the location of the Project and review of the Project by County staff, through compliance with the Consolidated Fire Code and through compliance with the San Diego County Fire Authority, the Project is not anticipated to expose people or structures to a significant risk of loss, injury or death involving hazardous 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.

As previously discussed, the GPU EIR determined impacts from wildland fires to be significant and unavoidable. However, the proposed Project would have a less-than-significant impact with no required mitigation for the reasons detailed above. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 9(h) The GPU EIR concluded this impact as less than significant. The Project 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. Therefore, the Project will not substantially increase exposure to vectors, including mosquitoes, rats or flies.

As previously discussed, the GPU EIR determined less than significant impacts with mitigation from vectors. The proposed Project would also have a less-than-significant impact. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

## **Conclusion**

With regards to the issue area of Hazards and Hazardous Materials, the following findings can be made:

1. No peculiar impacts to the Project or its site have been identified.

2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. No mitigation measures contained within the GPU EIR would be required because Project specific impacts would be less than significant by adhering to the Project conditions of approval, which are consistent with the GPU EIR.

<b>Significant Project Impact</b>	<b>Impact not identified by GPU EIR</b>	<b>Substantial New Information</b>
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**10. Hydrology and Water Quality** – Would the Project:

- |   |                          |                          |                          |
|---|--------------------------|--------------------------|--------------------------|
| a) Violate any waste discharge requirements?  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 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"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 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"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| d) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| e) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| f) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| g) Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

- |  |                          |                          |                          |
|--|--------------------------|--------------------------|--------------------------|
| h) Provide substantial additional sources of polluted runoff?  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| i) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map, including County Floodplain Maps? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| j) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| k) Expose people or structures to a significant risk of loss, injury or death involving flooding?  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| l) Expose people or structures to a significant risk of loss, injury or death involving flooding as a result of the failure of a levee or dam?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| m) Inundation by seiche, tsunami, or mudflow?  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

**Discussion**

The following Technical Studies were prepared for the Project related to hydrology and water quality:

1. A Preliminary Hydrology Study for Escondido Estates prepared by X Engineering & Consulting dated June 2021.
2. A Priority Development Project Stormwater Quality Management Plan (PDP SWQMP) prepared by X Engineering & Consulting dated May 4, 2021.

10(a) The GPU EIR concluded this impact to be significant and unavoidable. Development projects have the potential to generate pollutants during both the construction and operational phases. For the Project to avoid potential violations of any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality, storm water management plans are prepared for both phases of the development Project.

During the construction phase, the Project would prepare and implement a Storm Water Pollution Prevention Plan (SWPPP). The SWPPP would implement the following typical erosion control BMPs: 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 SWPPP would be prepared in accordance with Order No. 2009-009-DWQ, National Pollutant Discharge Elimination System (NPDES) Order CAS000002 Construction General Permit (CGP) adopted by the State Water Resources Control Board (SWRCB) on September 2, 2009. During the post-construction phase, as outlined in the PDP SWQMP, the Project would implement site design, source control and structural BMPs to prevent potential pollutants from entering storm water runoff. The PDP SWQMP has been

prepared in accordance with the County of San Diego BMP Design Manual (2019) and SDRWQCB Order No. R9-2013-0001 Municipal Separate Storm Sewer System (MS4) permit (2013), as adopted by the RWQCB on May 8, 2013.

The Project's conformance to the waste discharge requirements of both the CGP and MS4 storm water permits listed above ensures the Project would not create cumulatively considerable water quality impacts and addresses human health and water quality concerns. Therefore, the Project would not contribute to a cumulatively considerable impact to water quality from waste discharges.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to water quality standards and requirements. However, the proposed Project would have a less-than-significant impact to water quality standards through ordinance compliance as detailed above. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 10(b) The GPU EIR concluded this impact to be significant and unavoidable. The Project site lies in the Bear (905.24) hydrologic unit within the San Dieguito hydrologic unit. According to the Clean Water Act section 303(d) list, a portion of this watershed is impaired. Constituents of concern in the Lake Hodges and the San Dieguito watersheds include benthic community effects, color, manganese, mercury, nitrogen, phosphorus, total dissolved solids, and turbidity. The Project could contribute to release of these pollutants; however the project would comply with the WPO and implement site design measures, source control BMPs, and structural BMPs to prevent a significant increase of pollutants to receiving waters.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to water quality standards and requirements. However, the Project would have a less-than-significant impact to water quality standards with the implementation of project conditions listed in 10(a). The conditions are consistent with the GPU EIR mitigation measures Hyd-1.2 through Hyd-1.5. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 10(c) The GPU EIR concluded this impact to be significant and unavoidable. As stated in responses 10(a) and 10(b) above, implementation of BMPs and compliance with required ordinances will ensure that project impacts are less than significant.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to water quality standards and requirements and groundwater supplies and recharge. However, the proposed Project would have a less-than significant impact to water quality standards and requirements and groundwater supplies and recharge with the implementation of project conditions listed in 10(a). The conditions are consistent with the GPU EIR mitigation measures Hyd-1.2 through Hyd-1.5. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 10(d) The GPU EIR concluded this impact to be significant and unavoidable. The Project is within the service area of the City of Escondido that obtains water from surface reservoirs and other imported sources. The Project will not use groundwater for its potable water supply and adequate groundwater resources exist to support the use of an existing well for common-area irrigation. In addition, the Project does not involve operations that would interfere substantially with groundwater recharge.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to groundwater supplies and recharge. However, the proposed Project would have a less-than-significant impact to groundwater recharge. Therefore, the Project would not be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 10(e) The GPU EIR concluded this impact to be less than significant with mitigation. The Project would not result in substantial erosion or siltation on or off-site because storm water quality management plans are prepared for both the construction and post-construction phases of the development Project. During the construction phase, the Project would prepare and implement a SWPPP. The SWPPP would implement the following typical erosion control BMPs: hydraulic stabilization 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.

Existing site exits the site via a 8'W x 2'H box culvert at the eastern project boundary, crossing San Pasqual Valley Road to an unnamed natural drainage course that discharges into Lake Hodges, approximately 4 miles south of the project, where it joins the San Dieguito River, ultimately discharging into the Pacific Ocean north of Del Mar and south of Solana Beach.

The SWPPP would be prepared in accordance with Order No. 2009-009-DWQ, NPDES Order CAS000002 CGP adopted by the SWRCB on September 2, 2009. During the post-construction phase, as outlined in the Priority Development Project (PDP) Storm Water Quality Management Plan (SWQMP) dated June 1, 2020, the Project would implement site design, source control and structural BMPs to prevent potential pollutants from entering storm water runoff. The SWQMP has been prepared in accordance with the County of San Diego BMP Design Manual (2019) and SDRWQCB Order No. R9-2013-0001 Municipal Separate Storm Sewer System (MS4) permit (2013), as adopted by the RWQCB on May 8, 2013.

The SWPPP and SWQMP specify and describe the implementation process of all BMPs that would address equipment operation and materials management, prevent the erosion process from occurring, and prevent sedimentation in any onsite and downstream receiving waters. The Department of Public Works would ensure that these Plans are implemented as proposed.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to erosion or siltation. However, the proposed Project would have a less-than-significant impact to erosion or siltation with the implementation of Project conditions, consistent with GPU mitigation measures (Hyd-1.2 through Hyd-1.5). Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 10(f) The GPU EIR concluded this impact to be less than significant with mitigation. The Preliminary Hydrology Study prepared by X Engineering & Consulting dated June 1, 2020 determined that the proposed Project would not alter the existing drainage pattern in a

manner which would result in flooding on- or off-site. See response 10(e) for further discussion on on-site drainage patterns.

As previously discussed, the GPU EIR determined impacts to flooding as less than significant with mitigation. The proposed Project would have a less-than-significant impact with regards to flooding with design features and improvements consistent with GPU mitigation measures (Hyd-1.2 through Hyd-1.5). Therefore, the Project would not be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 10(g) The GPU EIR concluded this impact to be less than significant with mitigation. Pursuant to the Preliminary Drainage Study prepared for the proposed Project by X Engineering & Consulting dated May 4, 2021 and as described above in 10(e) and 10(f), the Proposed project would maintain the existing pre-development on-site drainage pattern. Post development drainage would be at or below pre-development rates of discharge.

As previously discussed, the GPU EIR determined impacts to exceed capacity of stormwater systems as less than significant with mitigation. The proposed Project would have a less-than-significant impact with regards to exceeding the capacity of stormwater systems with mitigation (Hyd-1.2 through Hyd-1.5). Therefore, the Project would not be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 10(h) The GPU EIR concluded this impact to be significant and unavoidable. The Project has the potential to generate pollutants; however, site design measures, source control BMPs, and treatment control BMPs as indicated in response 10(a) would be employed such that potential pollutants would be reduced to the maximum extent practicable.

As previously discussed, the GPU EIR determine impacts to water quality standards and requirements as significant and unavoidable. However, the proposed Project would have a less-than-significant impact to water quality standards with the implementation of project conditions listed in 10(a). The conditions are consistent with the GPU EIR mitigation measures Hyd-1.2 through Hyd-1.5. Therefore, the Project would not be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 10(i) The GPU EIR concluded this impact to be less than significant with mitigation. No FEMA or County-mapped floodplains were identified on the project site or off-site improvement locations. Therefore, the Project would not place housing within a County or federal floodplain or flood way.

As previously discussed, the GPU EIR determined impacts from housing within a 100-year flood hazard area as less than significant with mitigation. The proposed Project would have a less-than-significant impact for the reasons detailed above. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 10(j) The GPU EIR concluded this impact to be less than significant with mitigation. No FEMA or County-mapped floodplains were identified on the project site or off-site improvement locations. Therefore, the Project would not place housing within a County or federal floodplain or flood way.

As previously discussed, the GPU EIR determined impacts from housing within a 100-year flood hazard area as less than significant with mitigation. The proposed Project would have a less-than-significant impact for the reasons detailed above. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

10(k) The GPU EIR concluded this impact to be less than significant with mitigation. The project does not propose development within any identified special flood hazard area. As previously discussed, the GPU EIR determined impacts from housing within a 100-year flood hazard area and emergency response and evacuation plans as less than significant with mitigation. The proposed Project would have a less-than-significant impact for the reasons detailed above. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

10(l) The GPU EIR concluded this impact to be less than significant with mitigation. The County Office of Emergency Services maintains Dam Evacuation Plans for each dam operational area. These plans contain information concerning the physical situation, affected jurisdictions, evacuation routes, unique institutions, and event responses. If a “unique institution” is proposed, such as a hospital, school, or retirement home, within dam inundation area, an amendment to the Dam Evacuation Plan would be required. The project site lies outside a mapped dam inundation area for a major dam/reservoir within San Diego County.

As previously discussed, the GPU EIR determined impacts from dam inundation and flood hazards and emergency response and evacuation plans as less than significant with mitigation. The proposed Project would have a less-than-significant impact for the reasons detailed above. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

10(m)(i) The GPU EIR concluded this impact to be less than significant with mitigation.

SEICHE: The Project site is not located along the shoreline of a lake or reservoir.

10(m)(ii) TSUNAMI: The Project site is not located in a tsunami hazard zone.

10(m)(iii) MUDFLOW: Mudflow is type of landslide. See response to question 7(a)(iv).

As previously discussed, the GPU EIR determined impacts from seiche, tsunami and mudflow hazards to be less than significant with mitigation. However, the proposed Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

### **Conclusion**

With regards to the issue area of Hydrology and Water Quality, the following findings can be made:

1. No peculiar impacts to the project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.



3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. Feasible mitigation measures contained within the GPU EIR (Hyd-1.2 through Hyd-1.5) would be applied to the Project. The mitigation measures, as detailed above, requires the Project applicant to comply with the guidelines for determining significance for Hydrology and Water Quality as well as for Dam Inundation, the Watershed Protection Ordinance, Stormwater Standards Manual, and the Resource Protection Ordinance.

<b>Significant Project Impact</b>	<b>Impact not identified by GPU EIR</b>	<b>Substantial New Information</b>
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**11. Land Use and Planning** – Would the Project:

- |   |                          |                          |                          |
|---|--------------------------|--------------------------|--------------------------|
| a) Physically divide an established community?  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

**Discussion**

11(a) The GPU EIR concluded this impact to be less than significant with mitigation. The Project does not propose the introduction of new infrastructure such as major roadways, water supply systems, or utilities to the area. The Project is a residential subdivision proposing the development of 20 single-family residential lots and 2 HOA lots, consistent with the development density per the County of San Diego General Plan.

As previously discussed, the GPU EIR concluded physically dividing an established community as less than significant with mitigation. However, the proposed Project would have a less-than-significant impact for the reasons detailed above. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

11(b) The GPU EIR concluded this impact to be less than significant. The Project would subdivide a 10.28-acre property into 20 single-family residential lots and 2 HOA lots, which is consistent with the development density established by the General Plan and the certified GPU EIR. The discretionary actions for the Project include a tentative map and an administrative permit for lot area averaging.

The Project site is zone Limited Agriculture (A70) and has a General Plan land use designation of VR-2. As stated in response 11(a), the Project would be consistent with the General Plan allowed density and has been anticipated in the GPU EIR.

Additionally, the Project requires an administrative permit for lot area averaging to allow for lot sizes smaller than the 0.5-acre minimum lot size prescribed by Zoning for the site. Lot area averaging as a design feature of the Project aims to strike a balance between the preservation of sensitive environmental resources on-site and achieving maximum

residential density as prescribed by the General Plan. In this respect, the project has been designed as a conservation subdivision using the following criteria:

- The development footprint shall be located in the areas of the land being subdivided so as to minimize impacts to environmental resources.
- Development shall be consolidated to the maximum extent permitted by County regulations and the applicable Community Plans.
- The development footprint shall be located and designed to maximize defensibility from wildland fires and to accommodate all necessary fuel modification on site.
- Notwithstanding the requirements of the Slope Encroachment Regulations contained within Section 86.604(e) of the Resource Protection Ordinance, effective October 10, 1991, exceptions to the maximum permitted encroachment into steep slopes shall be allowed in order to avoid impacts to environmental resources that cannot be avoided by other means. The exceptions shall be limited to the minimum necessary to achieve the goals of the conservation subdivision program.
- Roads shall be designed to minimize impacts to environmental resources. Such design standards may include siting roads to reduce impacts from grading, consolidating development to reduce length of roads and associated grading, using alternative permeable paving materials and methods, reduce paved road widths, and smaller curve radii, consistent with applicant public safety considerations.
- Areas avoided from development shall be protected with open space or conservation easements consistent with the following design standards: 1) The largest blocks of unfragmented and interconnected open space shall be conserved; 2) Surface open space area to perimeter ratios shall be maximized by avoiding the creation of slivers or fingers of open space that extend in and around development; 3) Open space shall be located in areas with the maximum amount of connectivity with off-site open space; 4) Multiple habitat types, varying topography, agriculture, etc. shall be conserved to the maximum extent practicable; 5) Unique and/or sensitive resources shall be protected in the core of open space areas to the maximum extent practicable or suitable buffers shall be provided to protect these resources; and 6) Resources shall be avoided and placed in open space pursuant to the percentage indicated in Table 81.401.1. The avoided lands shall be protected with an easement dedicated to the County of San Diego or a conservancy approved by the Director. Land used for mitigation for project impacts may be used to satisfy the requirements of Table 81.401.1. The required open space shall be maintained as open space for as long as the lots created through this provision of the Ordinance remain, except in circumstances where a need to vacate is required for public health, safety or welfare.

As previously discussed, the GPU EIR determined impacts to conflicts with land use plans, policies, regulations as less than significant. As the Project would have a less-than significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

### **Conclusion**

With regards to the issue area of Land Use and Planning, the following findings can be made:

1. No peculiar impacts to the Project or its site have been identified.

2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. No mitigation measures contained within the GPU EIR would be required because Project specific impacts would be less than significant.

<b>Significant Project Impact</b>	<b>Impact not identified by GPU EIR</b>	<b>Substantial New Information</b>
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**12. 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?                                | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

12(a) The GPU EIR determined that impacts to mineral resources would be significant and unavoidable. The California Surface Mining and Reclamation Act (SMARA) required classification of land into Mineral Resource Zones (MRZs). 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 residential and civic (including a school), 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.

As previously discussed, the GPU EIR determined impacts to mineral resources to be significant and unavoidable. As the proposed Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

12(b) The GPU EIR concluded this impact to be significant and unavoidable. The Project is not located in an area that has MRZ-2 designated lands, nor is it located within 1,300 feet of such lands. 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. The Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

**Conclusion**

With regards to the issue area of Mineral Resources, the following findings can be made:

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. No mitigation measures contained within the GPU EIR would be required because Project specific impacts would be less than significant.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
<b>13. Noise</b> – Would the Project:			
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Discussion**

A Noise Report prepared by Ldn Consulting, Inc. and dated June 14th, 2021 was prepared for the Project.

12(a) The GPU EIR concluded this impact to be less than significant with mitigation. The area surrounding the project site consists of primarily single-family dwelling units and accessory structures. The Project will not expose people to potentially significant noise levels that exceed the allowable limits of the General Plan, Noise Ordinance, or other applicable standards for the following reasons:

General Plan – Noise Element: Policy 4b addresses noise sensitive areas and requires projects to comply with a Community Noise Equivalent Level (CNEL) of 60 decibels (dBA). Projects which could produce noise in excess of 60 dB(A) are required to incorporate

design measures or mitigation as necessary to comply with the Noise Element. The project site is located east of San Pasqual Valley Road (SR-78) and south of Idaho Avenue and thus, is impacted by these roadways. Based on the noise modeling included in the noise report, it demonstrated that with the implementation of the 5-foot and 6-foot solid wall or alternately a 10-foot barrier located along the right-of-way of San Pasqual Valley Road, the on-site exterior locations for the noise sensitive land uses would comply with the 60 dBA CNEL threshold. The report indicated that the 5-foot and 6-foot solid walls should be constructed on the southern area of Lot 13 and western portion of the site adjacent (Lots 14 through 16) or near San Pasqual Valley Road. Alternatively, a 10-foot barrier located along the right-of-way of San Pasqual Valley Road could be installed in lieu of individual noise walls at the pads. With the implementation of the noise walls/barrier, the exterior noise levels at the second-floor building facades are still anticipated to exceed the 60 dB CNEL at all proposed lots except Lots 5 and 6. Therefore, per the General Plan Noise Element a noise easement is required for the entire site, in order to mitigate the noise levels to compliance with the noise standards. With the implementation of these project design features, the Project is not expected to expose existing or planned noise sensitive areas to noise in excess of 60 dB(A).

Noise Ordinance – Section 36-404: Non-transportation noise generated by the Project is not expected to exceed the standards of the Noise Ordinance at or beyond the Project's property line. The site is zoned Limited Agriculture (A70) that has a one-hour average sound limit of 50 dBA daytime and 45 dBA nighttime. The adjacent properties are zoned Limited Agriculture and Rural Residential. The Project does not involve any noise producing equipment that would exceed applicable noise levels at the adjoining property line.

Noise Ordinance – Section 36-410: The Project will not generate construction noise in excess of Noise Ordinance standards. Construction operations will occur only during permitted hours of operation. 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.

As previously discussed, the GPU EIR determined impacts from excessive noise levels to be less than significant with mitigation. The Project would have a less-than-significant impact with the incorporation of design features and conditions. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 12(b) The GPU EIR concluded this impact to be less than significant with mitigation. The Project proposes residential uses which are sensitive to low ambient vibration. However, the residences would be setback more than 600 feet from any 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 600 feet ensures that the operations do not have any chance of being impacted by groundborne vibration or groundborne noise levels (Harris, Miller and Hanson Inc., Transit Noise and Vibration Impact Assessment 1995). In addition, the Project does not propose any blasting or rock crushing during the grading operations.

As previously discussed, the GPU EIR determined impacts from excessive groundborne vibration to be less than significant with mitigation. However, the Project would have a less than significant impact with no required mitigation for the reasons detailed above.

Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 12(c) As indicated in the response listed under Section 12(a), the Project would not expose existing or planned noise sensitive areas in the vicinity to a substantial permanent increase in noise levels that exceed the allowable limits of any applicable noise standards. Also, the Project is not expected to expose existing or planned noise sensitive areas to noise 10 dB CNEL over existing ambient noise levels.

As previously discussed, the GPU EIR determined impacts from permanent increase in ambient noise levels to be significant and unavoidable. However, the Project would have a less-than-significant impact with no required mitigation for the reasons detailed above. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 12(d) The GPU EIR concluded this impact to be less than significant with mitigation. The Project does not involve any operational uses that may create substantial temporary or periodic increases in ambient noise levels in the Project vicinity. Temporary construction noise was assessed and would be subject to the County 75 dBA eight-hour average requirement at the boundary of any occupied property, specifically an existing residence.

As previously discussed, the GPU EIR determined impacts from temporary increase in ambient noise levels to be less than significant with mitigation. However, the proposed Project would have a less than significant impact. However, the proposed Project would have a less than significant impact with specific Project conditions (listed in response 13(a)). Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 12(e) The GPU EIR concluded this impact to be less than significant with mitigation. The 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. The nearest airport is the Ramona Airport, which is approximately 8.8 miles away from the project site. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 12(f) The GPU EIR concluded this impact to be less than significant with mitigation. The Project is not located within a one-mile vicinity of a private airstrip. Therefore, the proposed Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

## Conclusion

With regards to the issue area of Noise, the following findings can be made:

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. No mitigation measures contained within the GPU EIR would be required because Project specific impacts would be less than significant by adhering to the project conditions of approval, which are consistent with the GPU EIR.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
<b>14. Population and Housing</b> – Would the Project:			
a) Induce substantial 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"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Discussion**

14(a) The GPU EIR concluded this impact to be less than significant. The Project site is designated in the General Plan as Village Residential (VR-2) The Project is consistent with the density allowable under the general plan, and thus would not induce substantial unplanned population growth in the area as development of the site was accounted for within the GPU. In addition, the Project does not propose any physical or regulatory change that would remove a restriction to or encourage population growth in the area.

As previously discussed, the GPU EIR determined impacts from population growth to be less than significant. As the proposed Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

14(b) The GPU EIR concluded this impact to be less than significant. The Project would not displace significant numbers of existing housing. The Project would develop 20 single-family residential lots. As such, replacement housing would not be required elsewhere.

As previously discussed, the GPU EIR determined impacts from displacement of housing to be less than significant. As the proposed Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

14(c) The GPU EIR concluded this impact to be less than significant. The Project would not displace a substantial number of people. The addition of 20 dwelling units will yield a net gain of available housing. As such, replacement housing would not be required elsewhere.

As previously discussed, the GPU EIR determined impacts from displacement of people to be less than significant. As the proposed Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

**Conclusion**

With regards to the issue area of Population and Housing, the following findings can be made:

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. No mitigation measures contained within the GPU EIR would be required because Project specific impacts would be less than significant.

<b>Significant Project Impact</b>	<b>Impact not identified by GPU EIR</b>	<b>Substantial New Information</b>
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**15. Public Services** – Would the Project:

a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance service ratios for fire protection, police protection, schools, parks, or other public facilities?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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**Discussion**

15(a) The GPU EIR concluded this impact to be less than significant with mitigation for the exception of school services, which remained significant and unavoidable. Based on the service availability forms received for the Project, the proposed Project would not result in the need for significantly altered services or facilities. Water service would be provided by the City of Escondido. Minor pipeline extensions would be required to serve the Project site for water services. Sanitation would be provided by individual OWTS on each lot.

Fire and emergency protection would be provided by the Escondido Fire Department. The nearest fire station is Escondido Fire Department’s Fire Station #2, located at 421 N Midway Drive in the incorporated City of Escondido. This station is approximately 1.8 miles from the Project site and has sufficient capacity to serve the Project.

Pursuant to the Project availability forms, students living within this community would attend schools of the Escondido Union School District and the Escondido Union High School District. The elementary school serving this site would be LR Green Elementary. The Middle School would be Bear Valley Middle School. High school students would attend Orange Glen High School. All applicable school fees to the Escondido Union and Escondido Union High School Districts would be required to be paid prior to the issuance of a building permit for each individual residence.

Based on the Project’s service availability forms, and the discussion above, the Project would not result in the need for significantly altered services or facilities. As previously discussed, the GPU EIR determined impact to fire protection services, police protection services and other public services as significant with mitigation while school services



remained significant and unavoidable. However, as the Project would have a less-than-significant impact for the reasons stated above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

**Conclusion**

With regards to the issue area of Public Services, the following findings can be made:

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. No mitigation measures contained within the GPU EIR would be required because Project specific impacts would be less than significant.

<b>Significant Project Impact</b>	<b>Impact not identified by GPU EIR</b>	<b>Substantial New Information</b>
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**16. Recreation** – Would the Project:

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"/>	<input type="checkbox"/>	<input type="checkbox"/>
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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"/>	<input type="checkbox"/>	<input type="checkbox"/>
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**Discussion**

16(a) The GPU EIR concluded this impact to be less than significant with mitigation. The Project could increase the use of existing parks and other recreational facilities; however, the Project would be required to comply with the County’s Park Land Dedication Ordinance (PLDO). The PLDO is the mechanism that enables the funding or dedication of local parkland in the County. The Project is a major grading plan for future residential development. To avoid any physical deterioration of local recreation facilities, the Project will be required to pay park fees prior to building permit issuance.

As previously discussed, the GPU EIR determined impacts related to deterioration of parks and recreational facilities to be less than significant. As the proposed Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

16(b) The GPU EIR concluded this impact to be less than significant with mitigation. The project does not include recreational facilities or require the construction or expansion of

recreational facilities. Therefore, the Project would have a less than significant impact from the construction or expansion of recreational facilities.

As previously discussed, the GPU EIR determined impacts related to construction of new recreational facilities to be less than significant. As the proposed Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

**Conclusion**

With regards to the issue area of Recreation, the following findings can be made:

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. No mitigation measures contained within the GPU EIR would be required because Project specific impacts would be less than significant.

<b>Significant Project Impact</b>	<b>Impact not identified by GPU EIR</b>	<b>Substantial New Information</b>
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**17. Transportation and Traffic** – Would the Project:

a) Conflict with an applicable plan, ordinance or policy establishing measures of the effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths and mass transit?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
--------------------------	--------------------------	--------------------------

c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
--------------------------	--------------------------	--------------------------

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

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
--------------------------	--------------------------	--------------------------

- e) Result in inadequate emergency access?
- f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

**Discussion**

17(a) The GPU EIR concluded this impact to be significant and unavoidable. The County of San Diego previously adopted "Guidelines for Determining Significance and Report Format and Content Requirements for Transportation and Traffic" in 2006, with revisions and modifications approved in 2007, 2009, 2010 and 2011. Revisions and modifications focused primarily on metrics related to vehicle delay through Level of Service (LOS). These Guidelines presented an evaluation of quantitative and qualitative analyses and objective and predictable evaluation criteria and performance measures for determining whether a land development project or a public project like a community plan has a significant traffic impact on the environment pursuant to the State California Environmental Quality Act (CEQA), as well as a determination of the required level of CEQA analysis.

Senate Bill 743 (SB 743) was signed into law on September 27, 2013 and changed the way that public agencies evaluate transportation impact under CEQA. A key element of this law is the elimination of using auto delay, LOS, and other similar measures of vehicular capacity or traffic congestion as a basis for determining significant transportation impacts under CEQA. The legislative intent of SB 743 was to "more appropriately balance the needs of congestion management with statewide goals related to infill development, promotion of public health through active transportation, and reduction of greenhouse gas (GHG) emissions." According to the law, "traffic congestion shall not be considered a significant impact on the environment" within CEQA transportation analysis.

In response, the Governor's Office of Planning and Research (OPR) updated CEQA Guidelines to establish new criteria for determining the significance of transportation impacts. Based on input from the public, public agencies, and various organizations, OPR recommended that Vehicle Miles Traveled (VMT) be the primary metric for evaluating transportation impacts under CEQA. VMT measures the number of vehicle trips generated and the length or distance of those trips.

SB 743 does not prevent a city or county from continuing to analyze delay or LOS as part of other plans (i.e., General Plan), studies, congestion management and transportation improvements, but these metrics may no longer constitute the basis for transportation impacts under CEQA analysis as of July 1, 2020. For example, in the County, the General Plan identifies LOS as being a required analysis, and even though it will no longer be a requirement of CEQA, unless the General Plan is amended, LOS will continue to be analyzed as part of project review.

The County of San Diego does not currently have adopted guidelines that govern the Implementation of SB 743 and analysis of projects using a VMT metric; therefore, the project is proposing a Project specific threshold of below the regional average VMT per capita. The Project is located in census tract 207.05 which has a VMT per resident of 18.99 which is below the regional average. The County of San Diego published Transportation Study Guidelines dated May 2020 which were formally adopted by the County Board of Supervisors on June 24th, 2020. The Board voted to adopt a significance

~~threshold for projects producing VMT of 15% below the unincorporated County VMT average. Using this threshold, projects are not required to conduct additional VMT analysis if the Project site is located within a VMT Efficient Area. A VMT Efficient Area is an area on County VMT maps that modelling data already shows is at least 15% below the unincorporated County VMT average per resident. The unincorporated County VMT average per resident is 32.54. A VMT rate that is 15% below the average is 27.66 VMT per resident.~~

~~Per OPR guidance and Pub. Resources Code, § 21083, subd. (b)(2); see CEQA Guidelines, § 15064, subd. (h)(1)., “a project that falls below an efficiency-based threshold that is aligned with long-term goals and relevant plans has no cumulative impact distinct from the project impact”. Therefore, according to the traffic experts at OPR, the VMT efficiency threshold used herein is the threshold for both a direct transportation impact and cumulative transportation impact.~~

~~The Project site has a VMT average of 24.71 and is located within a VMT Efficient Area. No significant direct or cumulative VMT impact would occur, and mitigation measures are not required. Furthermore, on February 9, 2022, the County Board of Supervisors directed County staff to prepare a new VMT screening criteria within identified infill areas that includes any surrounding “village” identified in the General Plan that are within Transit Opportunity Areas (TOAs), excluding areas mapped as High and Very High Fire Hazard Severity Zones. Upon adoption by the Board of Supervisors, the screening criteria will allow projects located in infill areas and any surrounding “village” as defined in the County’s General Plan to move forward without VMT analysis or mitigation.~~

Consistent with the County’s analysis of infill areas and the Board of Supervisors direction to define a new VMT screening criteria for infill areas, the Project meets the infill area VMT screening threshold as the project is located in a TOA and is not located in a High or Very High Hazard Severity Zone. The Project can be presumed to have a less than significant VMT impact. No detailed VMT analysis nor mitigation measures are required. Therefore, the Project would not conflict with an applicable plan, ordinance or policy establishing measures of the effectiveness for the performance of the circulation system and impacts would be less than significant.

As previously discussed, the GPU EIR determined significant and unavoidable impacts to unincorporated County traffic and LOS standards. The proposed Project determined impacts to be potentially significant. The Project would have a less-than-significant impact therefore, the Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 17(b) The GPU EIR concluded this impact to be significant and unavoidable. The designated congestion management agency for the County is the San Diego Association of governments (SANDAG). In October 2009, the San Diego region elected to be exempt from the State CMP and, since this decision, SANDAG has been abiding by 23 CFR 450.320 to ensure the region’s continued compliance with the federal congestion management process.

Section 15064.3 of the CEQA Guidelines details new regulations, effective statewide July 1, 2020 that sets forth specific considerations for evaluating a project’s transportation impacts. Generally, vehicle miles traveled (VMT) is the most appropriate measure of transportation impacts. VMT refers to the amount and distance of automobile travel attributable to a project. Other relevant considerations may include the effects of the

project on transit and non-motorized travel. Except as provided regarding roadway capacity, a project's effect on automobile delay shall not constitute a significant environmental impact. As discussed in 17 (a), the Project meets the Project specific threshold and infill area VMT screening criteria and is presumed to have a less than significant VMT impact. No mitigation measures are required. The Project site has a VMT average of 24.71 and is located within a VMT Efficient Area. No significant direct or cumulative VMT impact would occur, and mitigation measures are not required.

As previously discussed, the GPU EIR concluded this impact to be significant and unavoidable. The Project would not conflict with an applicable congestion management program and would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

17(c) The GPU EIR concluded this impact to be less than significant with mitigation. The Project site is not located within an Airport Influence Area, Airport Safety Zone, Airport Land Use Compatibility Plan Area, Avigation Easement, or Overflight Area. Therefore, the Project would have a less than significant impact to air traffic patterns. The Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

17(d) The GPU EIR concluded this impact to be significant and unavoidable. The proposed Project would not substantially alter traffic patterns, roadway design, place incompatible uses (e.g., farm equipment) on existing roadways, or create curves, slopes or walls which would impede adequate sight distance on a road. The Project will provide adequate sight distance from the proposed private access road.

As previously discussed, the GPU EIR determined impacts on rural road safety to be significant and unavoidable. However, the Project would have a less-than-significant impact with no mitigation required for the reasons detailed above. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

17(e) The GPU EIR concluded this impact to be less than significant with mitigation. 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. In addition, consistent with GPU EIR mitigation measure Tra-4.2, the Project would implement the Building and Fire codes to ensure emergency vehicle accessibility.

As previously discussed, the GPU EIR determined impacts on emergency access as less than significant with mitigation. As the Project would have a less-than-significant impact with the implementation of project conditions of approval for adherence to the building and fire codes, consistent with GPU EIR Mitigation Measure Tra-4.2. The Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

17(f) The GPU EIR concluded this impact to be less than significant with mitigation. The Project would not result in the construction of any road improvements or new road design features that would interfere with the provision of public transit, bicycle or pedestrian facilities. In addition, the Project does not generate sufficient travel demand to increase demand for transit, pedestrian or bicycle facilities.

As previously discussed, the GPU EIR determined impacts on alternative transportation and rural safety as less than significant with mitigation. As the proposed Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

**Conclusion**

With regards to the issue area of Transportation and Traffic, the following findings can be made

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. Feasible mitigation measures contained within the GPU EIR would be applied to the Project. The mitigation measures, as detailed above, would require the Project applicant to comply with the County Public Road Standards, Guidelines for Determining Significance, coordinate with other jurisdictions to identify appropriate mitigation and implement the Building and Fire Codes to ensure adequate services are in place.

<b>Significant Project Impact</b>	<b>Impact not identified by GPU EIR</b>	<b>Substantial New Information</b>
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**18. Utilities and Service Systems** – Would the Project:

- |  |                          |                          |                          |
|--|--------------------------|--------------------------|--------------------------|
| a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?                             | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?                                      | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?   | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| e) 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"/> | <input type="checkbox"/> | <input type="checkbox"/> |

- f) Be served by a landfill with sufficient permitted capacity to accommodate the project’s solid waste disposal needs?
- g) Comply with federal, state, and local statutes and regulations related to solid waste?

**Discussion**

18(a) The GPU EIR concluded this impact to be less than significant with mitigation. The Project proposes to discharge domestic waste to on-site wastewater systems (OSWS), also known as septic systems. Discharged wastewater must conform to the Regional Water Quality Control Board’s (RWQCB) applicable standards, including the Regional Basin Plan and the California Water Code. California Water Code Section 13282 allows RWQCBs to authorize a local public agency to issue permits for OSWS “to ensure that systems are adequately designed, located, sized, spaced, constructed and maintained.” The RWQCBs with jurisdiction over San Diego County have authorized the County of San Diego, Department of Environmental Health (DEH) to issue certain OSWS permits throughout the County and within the incorporated cities. The Project would require DEH approval of the OSWS lay-out for the Project pursuant to DEH, Land and Water Quality Division’s, “On-site Wastewater Systems: Permitting Process and Design Criteria” prior to obtaining a building permit for residential development. Therefore, the Project would be consistent with the wastewater treatment requirements of the RWQCB as determined by the authorized, local public agency.

As previously discussed, the GPU EIR determined impacts on wastewater treatment requirements as less than significant with mitigation. As the proposed Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

18(b) The GPU EIR concluded this impact to be less than significant with mitigation. The GPU EIR concluded this impact to be less than significant with mitigation. The Project would rely on an on-site wastewater treatment system would require DEH approval of the OSWS lay-out for the Project pursuant to DEH, Land and Water Quality Division’s, “On-site Wastewater Systems: Permitting Process and Design Criteria” prior to obtaining a building permit for residential development.

Additionally, Project requires water service from the City of Escondido. Service Availability Letter from the City of Escondido has been provided, indicating adequate water resources and entitlements are available to serve the requested water resources. Therefore, the Project would have sufficient water supplies available, and would not require substantial pipeline extensions to serve the Project. Thus, these extensions would not result in additional adverse physical effects beyond those already identified in other sections of this environmental analysis.

As previously discussed, the GPU EIR determined impacts to adequate water supplies be less than significant with mitigation. However, the proposed Project would have a less-than-significant for the reasons detailed above. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

18(c) The GPU EIR concluded this impact to be less than significant with mitigation. The Project involves new storm water drainage facilities, however, these extensions would not result

in additional adverse physical effects beyond those already identified in other sections of this environmental analysis.

As previously discussed, the GPU EIR determined impacts on sufficient stormwater drainage facilities to be less than significant. As the proposed Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 18(d) The GPU EIR concluded this impact to be significant and unavoidable. A Service Availability Letter from the City of Escondido Water District has been provided which indicates that there is adequate water to serve the Project.

As previously discussed, the GPU EIR determined impacts to adequate water supplies be significant and unavoidable. However, the proposed Project would have a less-than-significant impact with no required mitigation for the reasons detailed above. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 18(e) The GPU EIR concluded this impact to be less than significant with mitigation. The GPU EIR concluded this impact to be less than significant with mitigation. The Project would rely on on-site wastewater systems (septic systems); therefore, the Project would not interfere with any wastewater treatment provider's service capacity.

As previously discussed, the GPU EIR determined impacts to adequate wastewater facilities be less than significant with mitigation. However, the proposed Project would have a less-than-significant impact for the reasons detailed above. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 18(f) The GPU EIR concluded this impact to be significant and unavoidable. All solid waste facilities, including landfills require solid waste facility permits to operate. There are five, permitted active landfills in San Diego County with remaining capacity to adequately serve the Project. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 18(g) The GPU EIR concluded this impact to be less than significant. The Project would deposit all solid waste at a permitted solid waste facility. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

### **Conclusion**

With regards to the issue area of Utilities and Service Systems, the following findings can be made:

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.



4. No mitigation measures contained within the GPU EIR would be required because Project specific impacts would be less than significant.

Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
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**19. 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"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| 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 in the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| d) Expose people or structures to significant risk, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire instability, or drainage changes?  | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

**Discussion**

Wildfire was analyzed within the GPU EIR within Section 2.7, Hazards and Hazardous Materials. The guidelines for determining significance stated: the proposed General Plan Update would have a significant impact if it would expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands. In 2019, the issue of Wildfire was separated into its own section within Appendix G of the CEQA Guidelines to incorporate the four issue questions above. The GPU EIR did address these issues within the analysis; however, they were not called out as separate issue areas. Within the GPU EIR, the issue of Wildland Fires was determined to be significant and unavoidable.

A Fire Protection Plan was prepared for the Project by FIREWISE 2000, Inc. dated February 11, 2021.

- 19(a) The GPU EIR concluded this impact to be significant and unavoidable. The site is located within the Non-Wildland/ Non-Urban and Urban Unzoned fire hazard severity zone (FHSZ). The Project site is within the authority of the Escondido Fire Department, which is contracted with the Rincon Del Diablo Fire Protection District and is located approximately 1.8 miles from the nearest fire station. The nearest fire station is Escondido Fire Department’s Fire Station #2, located at 421 N Midway Drive in the incorporated City of Escondido. Based on the service availability forms received for the Project, the expected emergency travel time to the proposed Project would be 4 minutes. This would meet the response time required for the Project by the County of San Diego General Plan Safety Element of 5 minutes.

A Fire Protection Plan (FPP) was prepared for the Project by FIREWISE 2000, Inc. dated February 11, 2021. The FPP considered the property location, topography, geology, combustible vegetation (fuel types), climatic conditions and fire history as part of the assessment. It considers water supply, access, structure ignitability and fire resistive building materials, fire protection systems and equipment, impacts to existing emergency services, defensible space and vegetation management. Additionally, the FPP analyzed existing fire protection measures within the vicinity of the Project site and discussed measures to be undertaken by the proposed Project for the purpose of fire protection.

Roadways within the development will also be constructed to County standards and will include hammerheads or turn-arounds at the end of each street to facilitate fire apparatus turn movement. A single street access will be constructed off Idaho Avenue, east of the intersection with San Pascual Valley Road. The Project's street frontage will be constructed to County of San Diego DPW standards.

Fire protection requirements as required by the FPP and the Escondido Fire Department would be required to be maintained by the Project applicant until the formation of the Escondido Estates Homeowners Association (HOA) to serve the residential lots is established, at which time responsibility would be transferred to the HOA. This includes in part: fuel modification zones for buildings, structures, and access roads. Additionally, as required by the FPP, at least 50 feet of clearance would be kept free of all flammable vegetation as an interim fuel modification zone during construction of all structures.

As previously stated, Wildfire was analyzed within the GPU EIR within Section 2.7, Hazards and Hazardous Materials and was determined to be significant and unavoidable. However, the proposed Project would have a less-than-significant impact for the reasons detailed above. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 19(b) The GPU EIR concluded this impact to be significant and unavoidable. The GPU EIR concluded this impact to be significant and unavoidable. The Project is within the Non-Wildland/ Non-Urban and Urban Unzoned fire hazard severity zone (FHSZ). and within the Urban-Wildlife Interface Zone. The Project would comply with regulations relating to emergency access, water supply, and defensible space specified in the County Fire Code and Consolidated Fire Code. Implementation of these fire safety standards would occur during the building permit process and is consistent with GPU mitigation measures Haz-4.2 and Haz-4.3. In addition, the Project is consistent with the Zoning Ordinance and the density established under the County of San Diego General Plan. Therefore, for the reasons stated above, the Project would not be expected to experience exacerbated wildfire risks due to slope, prevailing, winds or other factors.

As previously stated, Wildfire was analyzed within the GPU EIR within Section 2.7, Hazards and Hazardous Materials and was determined to be significant and unavoidable. However, the proposed Project would have a less-than-significant impact with the implementation of GPU EIR mitigation measures Haz-4.2 and Haz-4.3 for the implementation of brush management and compliance with the building and fire codes. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 19(c) The GPU EIR concluded this impact to be significant and unavoidable. The Project would require the installation and maintenance of new private roads to serve the residential lots. All infrastructure associated with the Project has been incorporated within this analysis.

Therefore, no additional temporary or ongoing impacts to the environment related to associated infrastructure would occur that have not been analyzed in other sections of this environmental document.

As previously discussed, the GPU EIR determined impacts from Wildfire to be significant and unavoidable. However, the Project would have a less-than-significant impact for the reasons detailed above.

- 19(d) The GPU EIR concluded this impact to be significant and unavoidable. As previously stated in 19(b), the Project would comply with regulations relating to emergency access, water supply, and defensible space specified in the County Fire Code and Consolidated Fire Code. The site is located within a "Landslide Susceptibility Area" as identified in the County Guidelines for Determining Significance for Geologic Hazards and is considered to be Generally Susceptible. A soils compaction report with proposed foundation recommendation would be required to be approved prior to the issuance of a final grading permit. Therefore, for the reasons stated above, the project site would not expose people or structures to significant risk, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire instability, or drainage changes.

The GPU EIR concluded significant and unavoidable impacts associated with Wildfire under Section 2.7, Hazards and Hazardous Materials. However, the proposed Project would have a less-than-significant impact with for the reasons detailed above. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR

### **Conclusion**

With regards to the issue area of Wildfire, the following findings can be made:

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. Feasible mitigation measures contained within the GPU EIR (Haz-4.2 and Haz-4.3) would be applied to the Project. These mitigation measures, as detailed above, require the Project applicant to implement brush management and comply with the building and fire codes.

**Appendices**

Appendix A – References

Appendix B – Summary of Determinations and Mitigation within the Final Environmental Impact Report, County of San Diego General Plan Update, SCH # 2002111067

## Appendix A

The following is the list of Project specific technical studies used to support the Project's environmental analysis. All technical studies are available on the website here [https://www.sandiegocounty.gov/content/sdc/pds/Current\\_Projects.html#par\\_title](https://www.sandiegocounty.gov/content/sdc/pds/Current_Projects.html#par_title) or hard copies are available at the County of San Diego Zoning Counter, 5510 Overland Avenue, Suite 110, San Diego, 92123:

Brodie, Natalie; LSA, (March 17, 2021), Negative Cultural Resources Survey Report

Louden, Jeremy; Ldn Consulting, Inc., (May 26, 2021), Air Quality Assessment

Louden, Jeremy; Ldn Consulting, Inc. (June 14, 2021), Noise Assessment

LSA, (February 2021), Biological Resources Letter Report

X Engineering & Consulting, (June 2021), Preliminary Hydrology Study

X Engineering & Consulting, (May 4, 2021), Stormwater Quality Management Plan for Priority Development Projects

### References

For a complete list of technical studies, references, and significance guidelines used to support the analysis of the General Plan Update Final Certified Program EIR, dated August 3, 2011, please visit the County's website at:

[http://www.sdcounty.ca.gov/PDS/gpupdate/docs/BOS\\_Aug2011/EIR/FEIR\\_5.00\\_-\\_References\\_2011.pdf](http://www.sdcounty.ca.gov/PDS/gpupdate/docs/BOS_Aug2011/EIR/FEIR_5.00_-_References_2011.pdf)

## Appendix B

**A Summary of Determinations and Mitigation within the Final Environmental Impact Report, County of San Diego General Plan Update, SCH # 2002111067 is available on the Planning and Development Services website at:**

[http://www.sdcounty.ca.gov/pds/gpupdate/GPU\\_FEIR\\_Summary\\_15183\\_Reference.pdf](http://www.sdcounty.ca.gov/pds/gpupdate/GPU_FEIR_Summary_15183_Reference.pdf)

**REVIEW FOR APPLICABILITY OF/COMPLIANCE WITH  
ORDINANCES/POLICIES**

**FOR PURPOSES OF CONSIDERATION OF  
ESCONDIDO ESTATES TENTATIVE MAP: PDS2020-TM-5639; PDS2020-AD-20-007**

**June 15, 2021**

**I. HABITAT LOSS PERMIT ORDINANCE** – Does the proposed project conform to the Habitat Loss Permit/Coastal Sage Scrub Ordinance findings?

YES                      NO                      NOT APPLICABLE/EXEMPT  
                                           

Discussion:

While the proposed project and off-site improvements are located outside of the boundaries of the Multiple Species Conservation Program, the project site and locations of any off-site improvements do not contain habitats subject to the Habitat Loss Permit/Coastal Sage Scrub Ordinance. Therefore, conformance to the Habitat Loss Permit/Coastal Sage Scrub Ordinance findings is not required.

**II. MSCP/BMO** – Does the proposed project conform to the Multiple Species Conservation Program and Biological Mitigation Ordinance?

YES                      NO                      NOT APPLICABLE/EXEMPT  
                                           

Discussion:

The proposed project and any off-site improvements related to the proposed project are located outside of the boundaries of the Multiple Species Conservation Program. Therefore, conformance with the Multiple Species Conservation Program and the Biological Mitigation Ordinance is not required.

**III. GROUNDWATER ORDINANCE** - Does the project comply with the requirements of the San Diego County Groundwater Ordinance?

YES                      NO                      NOT APPLICABLE/EXEMPT  
                                           

Discussion:

The project will obtain its potable water supply from the City of Escondido Water District that obtains water from surface reservoirs or other imported sources. The project will not use groundwater for its potable water supply and adequate groundwater resources exist to support the use of an existing well for common-area irrigation. In addition, the project does not involve operations that would interfere substantially with groundwater recharge.

**IV. RESOURCE PROTECTION ORDINANCE** - Does the project comply with:

The wetland and wetland buffer regulations (Sections 86.604(a) and (b)) of the Resource Protection Ordinance?	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>	NOT APPLICABLE/EXEMPT <input type="checkbox"/>
The Floodways and Floodplain Fringe section (Sections 86.604(c) and (d)) of the Resource Protection Ordinance?	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>	NOT APPLICABLE/EXEMPT <input type="checkbox"/>
The Steep Slope section (Section 86.604(e))?	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>	NOT APPLICABLE/EXEMPT <input type="checkbox"/>
The Sensitive Habitat Lands section (Section 86.604(f)) of the Resource Protection Ordinance?	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>	NOT APPLICABLE/EXEMPT <input type="checkbox"/>
The Significant Prehistoric and Historic Sites section (Section 86.604(g)) of the Resource Protection Ordinance?	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>	NOT APPLICABLE/EXEMPT <input type="checkbox"/>

## Discussion:

***Wetland and Wetland Buffers:***

The site contains no wetland habitats as defined by the San Diego County Resource Protection Ordinance. The site does not have a substratum of predominately undrained hydric soils, the land does not support, even periodically, hydric plants, nor does the site have a substratum that is non-soil and is saturated with water or covered by water at some time during the growing season of each year. Therefore, it has been found that the proposed project complies with Sections 86.604(a) and (b) of the Resource Protection Ordinance.

***Floodways and Floodplain Fringe:***

The project is not located near any floodway or floodplain fringe area as defined in the San Diego County Resource Protection Ordinance (RPO), nor is it near a watercourse plotted on any official County floodway or floodplain map. Therefore, it has been found that the proposed project complies with Sections 86.604(c) and (d) of the RPO.

***Steep Slopes:***

Slopes with a gradient of 25 percent or greater and 50 feet or higher in vertical height are required to be placed in open space easements by the San Diego County Resource Protection Ordinance (RPO). There are no steep slopes as defined by the RPO on the property. Therefore, it has been found that the proposed project complies with Section 86.604(e) of the RPO.

***Sensitive Habitats:***

Sensitive habitat lands include unique vegetation communities and/or habitat that is either necessary to support a viable population of sensitive species, is critical to the proper functioning of a balanced natural ecosystem, or which serves as a functioning wildlife



corridor. No sensitive habitat lands were identified on the site. Therefore, it has been found that the proposed project complies with Section 86.604(f) of the RPO.

**Significant Prehistoric and Historic Sites:**

The property has been surveyed by a County of San Diego approved archaeologist, Natalie Brodie, and it has been determined that the property does not contain any archaeological/historical sites. As such, the project complies with the RPO.

**V. STORMWATER ORDINANCE (WPO)**- Does the project comply with the County of San Diego Watershed Protection, Stormwater Management and Discharge Control Ordinance (WPO)?

YES                      NO                      NOT APPLICABLE  
                                           

Discussion:

The project Storm Water Management Plan and Hydromodification Management Study have been reviewed and are found to be complete and in compliance with the WPO.

**VI. NOISE ORDINANCE** – Does the project comply with the County of San Diego Noise Element of the General Plan and the County of San Diego Noise Ordinance?

YES                      NO                      NOT APPLICABLE  
                                           

Discussion:

Staff has evaluated the plans and Noise Report prepared by Ldn Consulting Inc and dated June 4, 2021 and submitted to the County on June 4, 2021. Documentation is considered acceptable and staff has final noise recommendations. The project consists of a subdivision of a 10.3 acres parcel into 20 18 single family lots. The project is subject to the County Noise Element exterior noise threshold of 60 dBA CNEL for proposed exterior sensitive outdoor areas and 45 dB CNEL for interior use areas. The project is also subject to the Noise Ordinance Sections 36.404, 36.408 through 410, that regulate the operational and temporary construction noise.

The project site is located east of San Pasqual Valley Road (SR-78) and south of Idaho Avenue and thus, is impacted by these roadways. Based on the noise modeling included in the noise report, it demonstrated that with the implementation of the 5-foot wall along the southern area of Lot 13 and 6-foot wall along the western area of Lots 14 through 16, (as shown on Figure 2-C of the Noise Report prepared by Ldn Consulting Inc. dated June 4, 2021), OR alternately a 10-foot barrier located along the right-of-way of San Pasqual Valley Road, the on-site exterior locations for the noise sensitive land uses would comply with the 60 dBA CNEL threshold. With the implementation of the noise walls/barrier, the exterior noise levels at the second-floor building facades are still anticipated to exceed the 60 dB CNEL at all proposed lots. Therefore, per the General Plan Noise Element a noise easement is required for the entire site, in order to mitigate the noise levels to

compliance with the noise standards. A noise protection easement would be required for all the proposed lots, which would require an interior noise study for all units to determine the mitigation required to achieve an interior noise level of 45 CNEL. With the implementation of the 5-foot and 6-foot solid walls or the 10-foot solid wall and noise protection easement as the PDF, it ensures that the noise levels comply with the County General Plan Noise Elements. In addition, the project traffic contributions on nearby roadways were determined to result in less than significant for the off-site direct and cumulative impacts. Traffic would not result in a substantial contribution to the existing noise levels along any impacted nearby roadways pursuant to the County Noise Guidelines.

The project is also subject to the County Noise Ordinance which regulates temporary project related noise sources. Temporary construction noise is a 75 dBA eight-hour average requirement at the boundary of any occupied property, specifically any existing residences. Based upon the proposed site plan the majority of the grading operations will occur more than 100-feet from the northern and western property lines. At distances of more than 90-feet the grading activities are anticipated not to exceed the County's 75-dBA standard. Construction activities would spread out and move along the site. No blasting or rock crushing is anticipated during the grading operations. Based on the Noise Report, construction activities would comply with the County Noise Ordinance, Section 36.408. Incorporation of construction equipment measures would help reduce the overall construction equipment noise as temporary construction operations are not anticipated to exceed county noise standards. Incorporation of noise measures would ensure the project is in conformance with the County Noise Element and is in compliance with the County Noise Ordinance.

The 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 project site as well as surrounding site is zoned Limited Agriculture (A70), which is subject to noise levels of 50 dBA daytime and 45 dBA nighttime. The primary noise source from the project is from the mechanical ventilation system. The unshielded cumulative noise level from the units would be attenuated to compliance with the allowable noise levels at the nearest property line, which is can be located at approximately 50 feet from the source. At that distance, the noise levels would be reduced to less than significant.



**County of San Diego, Planning & Development Services**  
***Project Planning Division***

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**MEMORANDUM**

**TO:** File

**FROM:** Juliette Orozco, Project Manager

**SUBJECT:** Response to Comments; Escondido Estates Project  
PDS2020-TM-5639, PDS2020-AD-20-007, PDS2020-ER-20-08-007

**DATE:** July 8, 2022

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The following are staff's responses to comments received during the public disclosure period for the checklist prepared pursuant to the California Environmental Quality Act (CEQA) Section 15183 dated March 30, 2022, for the Escondido Estates Project (Project). The CEQA 15183 Checklist was circulated for public disclosure from March 31, 2022 through May 2, 2022 and four comment letters were received during that time.

**Response to comments received from the North County Transit District (May 3, 2022):**

- A1. The comment states the North County Transit District (NCTD) is suggesting the addition of bus stops on SR-78 adjacent to the project site and outlines the design standards for a bus stop.

This comment does not raise an issue regarding the adequacy of the 15183 Checklist; therefore, no changes were made to 15183 Checklist as a result of this comment and no further response is required. Nevertheless, the County and applicant will continue to coordinate with NCTD on their comments on the Project.

**Response to comments received from Escondido Community Housing Coalition (May 2, 2022):**

- B1. The commenter requests that the project provide at least four units of affordable/moderate housing and additional measures to promote resilience and health.

This comment does not raise an issue regarding the adequacy of the 15183 Checklist; therefore, no changes were made to 15183 Checklist as a result of this comment and no further response is required. Nevertheless, the County and applicant will continue to coordinate with Escondido Community Housing Coalition on their comments on the Project.

**Response to comments received from Coast Law Group on behalf of Coastal Environmental Rights Foundation (May 2, 2022):**



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- C1. The commenter states that the project attempts to take advantage of the CEQA streamlining provisions in Public Resources Code Section 21083.3 and CEQA Guidelines Section 15183 despite transportation impacts because the Project failed to adequately assess the Project's transportation impacts as required pursuant to CEQA Guidelines Section 15064.3.

CEQA Guidelines Section 15183 requires a streamlined environmental review process for projects that are consistent with the uses established by existing zoning, community plan, or general plan policies for which an Environmental Impact Report (EIR) was certified, provided there are no peculiar impacts as a result of the Project. The County of San Diego Board of Supervisors certified the Final Program Environmental Impact Report for the General Plan Update (GPU EIR) and adopted the update to the General Plan on August 3, 2011. The Board of Supervisors adopted the alternative titled "The Recommended Project" as described in Volume IV of the GPU EIR. The GPU EIR concluded that there were Significant and Unavoidable impacts to Unincorporated County Traffic Standards and to Adjacent Cities Traffic Standards.

A comprehensive environmental evaluation has been completed for the Project as documented in the revised 15183 Checklist dated March 31, 2022. A Project-specific analysis of Transportation and Vehicle Miles Travelled was performed as part of that environmental evaluation, showing Transportation and Traffic impacts to be less than significant. Furthermore, the comment does not identify how the traffic analysis was inadequate, therefore no further response is required.

- C2. The commenter states that the County of San Diego has not adopted a new Transportation Study Guide (TSG) and only staff direction has been given to date, therefore a significance threshold for CEQA purposes has not been adopted and the VMT Report's conclusion of "less than significant impacts" is not substantiated with substantial evidence.

Senate Bill 743 requires that project reviews under the California Environmental Quality Act (CEQA) that evaluate the transportation impacts of new developments could no longer use automobile delay, which is often referred to as Level of Service (LOS). As amended in December 2018, State CEQA Guidelines Section 15064.3 (Determining the Significance of Transportation Impacts) now specifies that "vehicle miles traveled" (VMT) shall be the most appropriate measure of transportation impacts.

Under CEQA, the lead agency (i.e., the County) *may* set their own significance thresholds, metrics, screening criteria, and analysis methodology. However, adoption of a Transportation Study Guide (TSG) or any threshold is not compulsory and has been limited across unincorporated counties within the State of California. Consistent with CEQA Guidelines Section 15064.3, individual projects may instead provide substantial evidence that they do not create VMT-related significant impacts.



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Furthermore, individual projects can provide their own substantial evidence to support a VMT conclusion of a less than significant impact, provided the analysis is in conformance with OPR's Technical Advisory. The analysis in support of this Project's determination that it is not VMT significant is located with the transportation analysis and supporting technical memo(s).

- C3. The commenter cites the County's technical memo entitled *Infill Areas in Unincorporated San Diego County* (County Infill Memo), dated October 29, 2021 and states that the Project does not provide the "require(d) evidence to support the determination that projects in these locations would have a less than significant transportation impact and meet the intent of SB 743" because "The substantial evidence to support the Infill Areas would be prepared as part of a new Transportation Study Guide (TSG) or a separate VMT screening threshold".

The Project prepared its own VMT Report independent of the County's Draft Transportation Study Guide (Draft TSG); however, the County's Draft TSG helped inform this Project's VMT Report. Both the Project's VMT Report and the County's technical memorandum entitled *Infill Areas in Unincorporated San Diego County* (County Infill Memo) dated October 29, 2021, which is incorporated by the Draft TSG, show that the Project's Traffic Analysis Zone (TAZ) is in a County-defined Infill Area. The County Infill Memo provides guidance on infill development through literature review and data analysis. Therefore, there is sufficient evidence to identify the Project Taz as Infill Area being able to meet the proposed screening criteria.

- C4. The commenter states that the VMT report does not provide sufficient evidence to identify the Project TAZ (1249) as Infill Area being able to meet the proposed screening criteria.

The Project's Traffic Analysis Zone (TAZ) is in a County-defined Infill Area, as identified in the County's Draft Transportation Study Guide (Draft TSG). The Draft TSG incorporates by appendix a technical memorandum entitled *Infill Areas in Unincorporated San Diego County* (County Infill Memo) dated October 29, 2021. The County Infill Memo provides guidance on infill development through literature review and data analysis. The VMT Report prepared for the Project utilizes the County Infill Memo to inform its findings, but is a separate analysis and provides a project-specific screening threshold. Therefore, there is sufficient evidence to identify the Project TAZ as Infill Area being able to meet the proposed screening criteria.

- C5. The commenter states that the VMT Study identifies the Project to be in an Infill Area and 2.5 miles from an identified mobility hub. The commenter further states that the service population density of the Project area does not support expansion of transit or build-out of the Mobility Hub and cites the VMT Study as stating, "This presents a



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significant challenge for the Unincorporated County since it is predominantly comprised of lower density suburban and rural communities, not served by transit, which is not ideal for efficient VMT production.”

The Project’s Traffic Analysis Zone (TAZ) is in a defined Infill Area, as identified in the Project’s VMT Report and the County’s Draft Transportation Study Guide (Draft TSG). The Project is located *within* a SANDAG Mobility Hub, which is defined in SANDAG’s 2021 Regional Plan as “communities with a high concentration of people, destinations, and travel choices. They offer on-demand travel options and supporting infrastructure that enhance connections to high-quality Transit Leap services while helping people make short trips around the community on Flexible Fleets. Mobility Hubs can span one, two, or a few miles based on community characteristics and are uniquely designed to fulfill a variety of travel needs while strengthening sense of place.”

The project is located approximately 2.5 miles from the Escondido Transit Center, which provides access to the North County Transit District’s SPRINTER light rail line and multiple BREEZE bus rapid transit lines (routes 235 and 280), in addition to bus lines (routes 305, 308, 350, 351, 352, 353, 354, 355, 356, 357, 358, 359, Flex 371, 388, MTS 235, MTS 280), and greyhound and Flixbus bus services. The Project is directly served by Route 371 at stops 0.8 miles to the North of the Project site and 0.9 miles to the South of the Project Site.

The Project is also located within a County "Transit Opportunity Area," which are the areas the County is working with SANDAG to establish high-frequency and quality transit services.

In totality of the circumstances surrounding the Project’s relationship to transit opportunities, the density of the project site does continue to support expansion of transit or build-out of the Mobility Hub, and furthermore does not prohibit future transit opportunities. The specific citation of the VMT study used by the commenter is not applicable to these circumstances because of the existing transit infrastructure in the area and placement within a County "Transit Opportunity Area."

- C6. The commenter states that the County Infill Memo asserts that because there are a limited number of high-frequency regional transit services planned within the unincorporated County, and none are proposed within the North County Metro area, transit expansion to the North County Metro area would require higher density, which the Project area currently lacks. The commenter further states that to fulfill the County’s transit opportunity area plans, the County would have to develop infill/TOD styles for application to development proposals and mitigate for their VMT impacts until transit services are established. The commenter states that the project insufficiently provides this analysis and mitigation.



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The Project is located within a County "Transit Opportunity Area," which are the areas the County is working with SANDAG to establish high-frequency and quality transit services. However, the County does not control where SANDAG proposes high-frequency transit service. The County is prioritizing these Infill Areas within or near Mobility Hubs as part of the continued coordination efforts with SANDAG.

The County Infill Memo provides guidance on infill development through literature review and data analysis. The VMT Report prepared for the Project utilizes the County Infill Memo to inform its findings, and therefore does provide sufficient analysis for the Project. Furthermore, the County's development of infill/TOD styles would not be appropriate as mitigation for an individual project which is not creating significant impacts to transportation/traffic.

- C7. The commenter states that the Project's low density does not support any future attempts to create the density needed to support future transit opportunities.

The Project is located in an area that meets the density requirements to meet the definition of Infill development. Infill Areas are identified in SB 743 as the most optimal areas to be served by high-frequency transit, however SB 743 does not mandate local jurisdictions to upzone in order create future transit opportunities. The Project is also located within a County "Transit Opportunity Area," which are the areas the County is working with SANDAG to establish high-frequency and quality transit services.

In totality of the circumstances surrounding the Project's relationship to transit opportunities, the density of the project site does continue to support expansion of transit or build-out of the Mobility Hub, and furthermore does not prohibit future transit opportunities. Furthermore, CEQA does not contemplate impacts to unforeseeable circumstances, such as project's potential to inhibit possible future transit opportunities when the project is in conformance with applicable zoning and general plan designations, and is within a defined Infill Area.

Additionally, the Project does not allow for higher density due to constraints such as septic capacity and setback requirements based on the current County Zoning Ordinance. These particular constraints however, would not prohibit Accessory Dwelling Units from being built on the property by either the developer or individual homeowner in accordance with State and County statutes and guidelines.

- C8. The commenter states that the Project exceeds the Board-directed significance threshold and the OPR Technical Advisory threshold of significance for new residential projects, and, therefore, the Project results in a significant transportation impact, contrary to the VMT Report.



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The County Board of Supervisors has not adopted significance thresholds for VMT, and a project cannot be required to adhere to thresholds which are not yet codified. Additionally, the OPR Technical Advisory threshold is advisory in nature and does not contain compulsory threshold requirements, and a project cannot be required to adhere to thresholds which are advisory in nature. Consistent with CEQA Guidelines Section 15064.3, individual projects may instead provide substantial evidence that they do not create VMT-related significant impacts.

A comprehensive environmental evaluation has been completed for the Project as documented in the revised 15183 Checklist dated March 31, 2022. A Project-specific analysis of Transportation and Vehicle Miles Travelled was performed as part of that environmental evaluation, showing Transportation and Traffic impacts to be less than significant.

- C9. The commenter states that The Project's lack of appropriate BMPs also results in a significant water quality impact peculiar to the Project. The commenter states that the 15183 Exemption Checklist's reliance on Project's SWQMP being prepared in accordance with the 2019 County BMP Design Manual and MS4 permit is incorrect.

The Best Management Practices (BMP) Design Manual was updated in 2020 to provide new templates and calculation tools. There was no change in the methodology for calculating BMP sizes. Therefore the 2019 and 2020 BMP Design Manuals both can be used to demonstrate compliance with the 2013 MS4 permit. There have been no changes to the 2013 MS4 permit since 2016.

- C10. The commenter states that the SWQMP states "[b]ased on the preliminary geotechnical investigation prepared by Vinje & Middleton Engineering, the project site has an infiltration rate too low to justify feasibility of infiltration BMPs," and as a result, the Project does not include any infiltration BMPs. The commenter states that the study does not include any infiltration rate information or percolation studies. The commenter also states that neither the SWQMP nor the geotechnical investigation report comply with the County's BMP Design Manual requirements for calculation of infiltration rate assessment.

The project is proposing Biofiltration BMPs with an impervious liner based on preliminary geotechnical assessment. Biofiltration BMPs are required to meet approximately the same pollutant removal as infiltration BMPs and therefore this design is adequate to demonstrate consistency with requirements for Discretionary permitting and CEQA thresholds. If during final engineering it is determined that infiltration is feasible the design can be refined and the BMPs can be reduced to be more efficient.





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- C11. The commenter states that the Project has not shown retention of the 85th percentile is not feasible, as required by the MS4 Permit and BMP Design Manual. The commenter states that because the Project is inconsistent with these requirements, it would result in increased storm water runoff and pollutant loading to downstream impaired waterbodies, resulting in water quality impacts to the Project.

The Best Management Practices (BMP) Design Manual was updated in 2020 to provide new templates and calculation tools. There was no change in the methodology for calculating BMP sizes. Therefore the 2019 and 2020 BMP Design Manuals both can be used to demonstrate compliance with the 2013 MS4 permit. There have been no changes to the 2013 MS4 permit since 2016.

The project is proposing Biofiltration BMPs with an impervious liner based on preliminary geotechnical assessment. Biofiltration BMPs are required to meet approximately the same pollutant removal as infiltration BMPs and therefore this design is adequate to demonstrate consistency with requirements for Discretionary permitting and CEQA thresholds. If during final engineering it is determined that infiltration is feasible the design can be refined and the BMPs can be reduced to be more efficient.

**Response to comments received from California Department of Transportation (Caltrans) (May 2, 2022; revised May 9, 2022):**

- D1. The commenter provided redlined Preliminary Grading Plans with comments for the Project.

This comment does not raise an issue regarding the adequacy of the 15183 Checklist; therefore, no changes were made to 15183 Checklist as a result of this comment and no further response is required. Nevertheless, the County and applicant will continue to coordinate with Caltrans on their comments on the Project.

- D2. The commenter provided a comment letter originally submitted April 8, 2021 in response to the Project's Preliminary Hydrology Report.

This comment does not raise an issue regarding the adequacy of the 15183 Checklist; therefore, no changes were made to 15183 Checklist as a result of this comment and no further response is required. Nevertheless, the County and applicant will continue to coordinate with Caltrans on their comments on the Project.

- D3. The commenter stated in their comment letter dated May 2, 2022 (Original Letter) that any modification to the existing Caltrans drainage and/or increase in runoff to State facilities will not be allowed, and states that additional comments regarding the Preliminary Hydrology Report and Preliminary Grading Plan would be forthcoming. In



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their revised comment letter dated May 9, 2022 (Revised Letter) the commenter requested edits and plan corrections to the Preliminary Hydrology Report, as well as reiterated their comments made in the April 8, 2021 comment letter.

This comment does not raise an issue regarding the adequacy of the 15183 Checklist; therefore, no changes were made to 15183 Checklist as a result of this comment and no further response is required. Nevertheless, the County and applicant will continue to coordinate with Caltrans on their comments on the Project.

- D4. The commenter states that they are requesting early coordination between Caltrans and the County regarding complete streets and mobility networks, and states the importance of maintaining access to bicycle, pedestrian, and public transit access during construction.

This comment does not raise an issue regarding the adequacy of the 15183 Checklist; therefore, no changes were made to 15183 Checklist as a result of this comment and no further response is required. Nevertheless, the County and applicant will continue to coordinate with Caltrans on their comments on the Project.

- D5. The commenter provides a correction to project ID listed on one of the Preliminary Grading Plan sheets, and provides the applicable plan sheet for reference in reference to the "Design" section of the comment letter dated May 2, 2022.

This comment does not raise an issue regarding the adequacy of the 15183 Checklist; therefore, no changes were made to 15183 Checklist as a result of this comment and no further response is required. Nevertheless, the County and applicant will continue to coordinate with Caltrans on their comments on the Project.

- D6. The commenter states that Caltrans supports collaboration with local agencies to work towards a safe, functional, interconnected, multi-modal transportation network integrated through applicable "smart growth" type land use planning and policies, and requests that the County continue to coordinate with Caltrans to implement necessary improvements at intersections and interchanges where the agencies have joint jurisdiction.

This comment does not raise an issue regarding the adequacy of the 15183 Checklist; therefore, no changes were made to 15183 Checklist as a result of this comment and no further response is required. Nevertheless, the County and applicant will continue to coordinate with Caltrans on their comments on the Project.

- D7. The commenter states that Caltrans has discretionary authority over SR-78 within the project area. The commenter is providing notification that permits may be required for oversized vehicles or other circumstances; that a traffic control plan will be required



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prior to start of construction; and that coordination for impacts to highway facilities will be required.

This comment does not raise an issue regarding the adequacy of the 15183 Checklist; therefore, no changes were made to 15183 Checklist as a result of this comment and no further response is required. Nevertheless, the County and applicant will continue to coordinate with Caltrans on their comments on the Project.

- D8. The commenter provides notification that they are not responsible for existing or future traffic noise impacts associated with the existing configuration of SR-78.

This comment does not raise an issue regarding the adequacy of the 15183 Checklist; therefore, no changes were made to 15183 Checklist as a result of this comment and no further response is required. Nevertheless, the County and applicant will continue to coordinate with Caltrans on their comments on the Project.

- D9. The commenter states that The Air Quality Assessment dated May 26, 2021 and the Greenhouse Gas Emissions section of the 15183 Exemption Checklist has satisfied the requirements to evaluate and address air quality impacts from the proposed project.

This comment does not raise an issue regarding the adequacy of the 15183 Checklist; therefore, no changes were made to 15183 Checklist as a result of this comment and no further response is required. Nevertheless, the County and applicant will continue to coordinate with Caltrans on their comments on the Project.

- D10. The commenter states that the Hazards and Hazardous Material section of the 15183 Exemption Checklist has satisfied the requirements to evaluate and address hazardous waste impacts from the proposed project. The commenter states that a hazardous waste concern for this project is aerially deposited lead (ADL). The commenter states that the Department of Toxic Substances Control (DTSC) sets regulatory thresholds for lead in soil, based on risk assessment work performed by CalEPA's Office of Environmental Health Hazard Assessment (OEHHA). It is the Permittee's responsibility to comply with the DTSC ADL requirements for roadway soil management.

This comment does not raise an issue regarding the adequacy of the 15183 Checklist; therefore, no changes were made to 15183 Checklist as a result of this comment and no further response is required. Nevertheless, the County and applicant will continue to coordinate with Caltrans on their comments on the Project.

- D11. The commenter states that The Noise Assessment dated 6/4/21 has satisfied the requirements to evaluate and address noise impacts from the proposed development.



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This comment does not raise an issue regarding the adequacy of the 15183 Checklist; therefore, no changes were made to 15183 Checklist as a result of this comment and no further response is required. Nevertheless, the County and applicant will continue to coordinate with Caltrans on their comments on the Project.

- D12. The commenter states that it should be recognized that definition and evaluation of geologic and environmental conditions are a difficult and inexact science, and that more detailed and extensive studies yield more information, which may help understand and manage the level of risk.

This comment does not raise an issue regarding the adequacy of the 15183 Checklist; therefore, no changes were made to 15183 Checklist as a result of this comment and no further response is required. Nevertheless, the County and applicant will continue to coordinate with Caltrans on their comments on the Project.

- D13. The commenter states that they recognize that teleworking and remote learning lessen the impacts of traffic on our roadways and surrounding communities, and this reduces the amount of VMT and decreases the amount of greenhouse gas (GHG) emissions and other pollutants. The commenter also states that the availability of affordable and reliable, high-speed broadband is a key component in supporting travel demand management and reaching the state's transportation and climate action goals.

This comment does not raise an issue regarding the adequacy of the 15183 Checklist; therefore, no changes were made to 15183 Checklist as a result of this comment and no further response is required. Nevertheless, the County and applicant will continue to coordinate with Caltrans on their comments on the Project.

- D14. The commenter states that per Business and Profession Code 8771, perpetuation of survey monuments by a licensed land surveyor is required, if they are being destroyed by any construction. The commenter also states that any work performed within Caltrans' Right of Way would require discretionary review and approval by Caltrans and an encroachment permit would be required prior to construction.

This comment does not raise an issue regarding the adequacy of the 15183 Checklist; therefore, no changes were made to 15183 Checklist as a result of this comment and no further response is required. Nevertheless, the County and applicant will continue to coordinate with Caltrans on their comments on the Project.

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**NOTICE OF EXEMPTION**

TO: Recorder/County Clerk  
Attn: James Scott  
1600 Pacific Highway, M.S. A33  
San Diego, CA 92101

FROM: County of San Diego  
Planning & Development Services, M.S. O650  
Attn: Project Planning Division Section Secretary

**SUBJECT: FILING OF NOTICE OF EXEMPTION IN COMPLIANCE WITH PUBLIC RESOURCES CODE SECTION 21108 OR 21152**

Project Name: Escondido Estates Tentative Map and Administrative Permit; PDS2020-TM-5639; PDS2020-AD-20-007; PDS2020-ER-20-08-007

Project Location: Southeast of the intersection of Idaho Avenue and San Pasqual Valley Road (SR-78), in the North County Metropolitan Subregional Plan area, within unincorporated San Diego County (APN: 234-231-01).

Project Applicant: Oscar Uranga, Escondido Estates, LLC, 19782 McArthur Blvd Suite 300, Irvine, CA 92612 (949) 933-4103

Project Description: The project is a request for a Tentative Map consisting of the subdivision of a vacant 10.23-acre parcel into 20 single-family residential lots. The project also includes an Administrative Permit to allow for lots smaller than the minimum lot size (lot area averaging). Access to the site will be provided by a single private road entrance connecting to Idaho Avenue. The Project would be served by onsite wastewater treatment systems for each lot and imported water from the City of Escondido. Proposed earthwork quantities for the project consist of 54,705 cubic yards of cut and 70,906 cubic yards of fill with 16,201 cubic yards of imported material.

The project site is subject to the Village General Plan Regional Category, Land Use Designation Village Residential (VR-2). Zoning for the project site is Limited Agricultural (A70). The proposed uses are consistent with the Zoning and General Plan Land Use Designation of the property established by the General Plan Update for which an Environmental Impact Report (EIR) was certified by the Board of Supervisors on August 3, 2011 (GPU EIR).

Agency Approving Project: County of San Diego

County Contact Person: Juliette Orozco Telephone Number: (619) 323-7949

Date Form Completed: June 7, 2022

This is to advise that the County of San Diego Planning Commission has approved the above-described project on October 1, 2021 and found the project to be exempt from the CEQA under the following criteria:

1. Exempt status and applicable section of the CEQA ("C") and/or State CEQA Guidelines ("G"): (check only one)
  - Declared Emergency [C 21080(b)(3); G 15269(a)]
  - Emergency Project [C 21080(b)(4); G 15269(b)(c)]
  - Statutory Exemption. C Section:
  - Categorical Exemption. G Section:
  - G 15061(b)(3) - It can be seen with certainty that there is no possibility that the activity in question may have a significant effect on the environment and the activity is not subject to the CEQA.
  - G 15182 – Residential Projects Pursuant to a Specific Plan
  - G 15183 – Projects Consistent with a Community Plan, General Plan, or Zoning
  - Activity is exempt from the CEQA because it is not a project as defined in Section 15378.
2. Mitigation measures  were  were not made a condition of the approval of the project.
3. A Mitigation reporting or monitoring plan  was  was not adopted for this project.

Statement of reasons why project is exempt: Section 15183 consists of project which are consistent with development density established by existing zoning, community plan, or general plan policies for which an EIR was certified These projects shall not require additional environmental review, except as might be necessary to examine whether there are project-specific effects which are peculiar to the project or its site. This streamlines the review of such projects and reduces the need to prepare repetitive environmental studies.

The following is to be filled in only upon formal project approval by the appropriate County of San Diego decision-making body.

Signature: \_\_\_\_\_ Telephone: (619) 323-7949

Name: Juliette Orozco Title: Land Use/Environmental Planner

This Notice of Exemption has been signed and filed by the County of San Diego.

This notice must be filed with the Recorder/County Clerk as soon as possible after project approval by the decision-making body. The Recorder/County Clerk must post this notice within 24 hours of receipt and for a period of not less than 30 days. At the termination of the posting period, the Recorder/County Clerk must return this notice to the Department address listed above along with evidence of the posting period. The originating Department must then retain the returned notice for a period of not less than twelve months. Reference: CEQA Guidelines Section 15062.

## **Attachment F – Public Documentation**



1140 South Coast Hwy. 101  
Encinitas, CA 92024

Tel 760-942-8505  
Fax 760-942-8515  
[www.coastlawgroup.com](http://www.coastlawgroup.com)

July 30, 2021

Heather Steven  
County of San Diego  
Planning and Development Services  
5510 Overland Avenue, Suite 110  
San Diego, CA 92101

**Via Electronic Mail**  
[heather.steven@sdcounty.ca.gov](mailto:heather.steven@sdcounty.ca.gov)

RE: **Escondido Estates Tentative Map; PDS2020-TM-5639; PDS2020-AD-20-007; PDS2020-ER-20-08-007**

Dear Ms. Steven:

Please accept the following comments regarding the Escondido Estates Tentative Map ("Project") on behalf of our client the Coastal Environmental Rights Foundation. CERF is a nonprofit environmental organization founded by surfers in North San Diego County and active throughout California's coastal communities. CERF was established to aggressively advocate, including through litigation, for the protection and enhancement of coastal natural resources and the quality of life for coastal residents.

The Project attempts to take advantage of the CEQA streamlining provisions in Public Resources Code Section 21083.3 and CEQA Guidelines Section 15183. However, the Project assessment (including the "Statement of Reasons") fails to adequately assess the Project's transportation impacts as required pursuant to CEQA Guidelines Section 15064.3. The General Plan EIR does not assess transportation impacts using the appropriate criteria for land use projects, namely vehicle miles traveled (VMT).

As the Statement of Reasons notes, Senate Bill 743 (SB 743) was "signed into law on September 27, 2013 and changed the way that public agencies evaluate transportation impact under CEQA." (Statement of Reasons, 15183 Exemption Checklist, p. 52). The Statement of Reasons further acknowledges "SB 743 does not prevent a city or county from continuing to analyze delay or LOS as part of other plans (i.e., General Plan), studies, congestion management and transportation improvements, **but these metrics may no longer constitute the basis for transportation impacts under CEQA analysis as of July 1, 2020.**" (*Id.*, emphasis added).

In light of these statutory and regulatory developments, the County must assess the Project's transportation impacts outside of the General Plan EIR, which focused on

LOS and automobile delay. To do so, the Statement of Reasons relies on the County's Transportation Study Guidelines ("TSG"), which establish a baseline average County VMT per resident of 32.54. (*Id.*). However, the TSG is currently being challenged in San Diego Superior Court<sup>1</sup>, based in part on the County's flawed geographic approach. (See, County TSG, p. F-5 [defining region as the Unincorporated County] and pp. F.1-F.2 [definition of "region"]).

The TSG rely on a nonsensical interpretation of the Office of Planning and Research (OPR) Technical Advisory. The Technical Advisory cannot – as the County suggests – be read to allow transportation impact analysis based on cherry-picked rural VMT figures. Regional VMT applies to a Metropolitan Planning Organization (MPO) area – not an unincorporated "region." The Technical Advisory is clear on this issue – region is an MPO area, not an agency-specific "region." OPR's SB 743 Frequently Asked Questions ("FAQ") page<sup>2</sup> states this in unequivocal terms:

**In the VMT Technical Advisory, does the term "regional" refer to the MPO/RTPA?**

Yes. As used in the VMT Technical Advisory, "regional" refers to the full geography within the jurisdictional borders of a metropolitan planning organization (MPO) or a regional transportation planning agency (RTPA). Comparing a project's VMT per capita or VMT per employee to that of the entire region (i.e., MPO or RTPA) or entire city allows a lead agency to better align with the state's climate commitments. Comparison to only a portion of the region or city could result in a less environmentally protective significance threshold, potentially disconnecting significance determinations from those commitments. **For example, comparing a project to only the unincorporated areas of a county, or just a select portion of a county, may exclude lower VMT areas.** However, thresholds that vary by location, but where each threshold is more environmentally protective than a region- or city-based threshold, would still be aligned with state climate commitments. (emphasis added)

Thus, the County's interpretation runs afoul of OPR guidance and allows rural areas to measure impacts against an artificially increased baseline (higher VMT) in order to conceal transportation impacts and frustrate the State's greenhouse gas reduction and infill development goals. The County's TSG methodology therefore not only undermines the intent of SB 743, but also incentivizes inefficient sprawl development. As a result, the County's reliance on the TSG will result in significant environmental impacts.

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<sup>1</sup> *Cleveland National Forest Foundation, et al. v. County of San Diego, et al.*; San Diego Superior Court Case No. 37-2020-00031320-CU-WM-CTL

<sup>2</sup> <https://opr.ca.gov/ceqa/updates/sb-743/faq.html>



Heather Steven  
**Escondido Estates**  
July 30, 2021  
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Here, use of the appropriate regional baseline as instructed by OPR results in a significant transportation impact peculiar to the instant Project. (CEQA Guidelines §15183(b)(1)-(3)). The regional average VMT is 21.85 VMT per capita. (See Board Letter for TSG approval, June 24, 2020, p. 13). The instant Project did not conduct a site-specific VMT analysis but is within an area with average VMT of 24.71. (Statement of Reasons, p. 53). Therefore, the Project will not meet the TSG and OPR-suggested threshold of significance (15 percent below baseline).

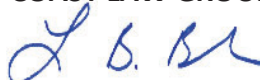
Assuming the Project's VMT matches that of the project area, it would result in 6.14 VMT per capita more than the appropriate threshold of significance. The Project proposes 20 single-family residences with three to five bedrooms and four to six full-time residents. (See, Nitrate Mass Balance Study, p. 4). This results in 491.2 to 736.8 more daily VMT than the OPR and TSG threshold of significance when the regional average is applied instead of the unincorporated average. This Project-specific impact was not analyzed in the General Plan EIR and constitutes a significant impact. Coupled with other projects which have either already been approved or are in process and rely upon continued application of the erroneous TSG baseline, this increased VMT will also result in significant cumulative transportation, air quality, and greenhouse gas impacts. (CEQA Guidelines §15183(b)(3)).

As a result of the Project's undisclosed significant transportation and related impacts, the County's streamlined CEQA analysis is incomplete. Therefore, the CEQA document must be revised to include a detailed analysis of the Project's significant transportation impacts consistent with CEQA Guidelines Section 15064.3.

Thank you in advance for your consideration of our comments.

Sincerely,

**COAST LAW GROUP LLP**



Livia B. Beaudin  
Attorneys for CERF



# San Diego County Archaeological Society, Inc.

Environmental Review Committee

15 August 2021

To: Ms. Heather Steven  
Department of Planning and Development Services  
County of San Diego  
5510 Overland Avenue, Suite 310  
San Diego, California 92123

Subject: Intent to Adopt Findings Pursuant to CEQA Section 15183  
Escondido Estates Tentative Map  
PDS2020-TM-5639, PDS2020-AD-20-007, PDS2020-ER-20-08-007

Dear Ms. Steven:

I have reviewed the subject document on behalf of this committee of the San Diego County Archaeological Society.

Based on the information contained in the 15183 Checklist and the cultural resources survey report by LSA, we concur with the mitigation monitoring program defined in the Checklist.

Thank you for the opportunity to review and comment upon this project's environmental documents.

Sincerely,

A handwritten signature in black ink, appearing to read "James W. Royle, Jr.", is written over the typed name.

James W. Royle, Jr., Chairperson  
Environmental Review Committee

cc: SDCAS President  
File



1140 South Coast Hwy. 101  
Encinitas, CA 92024

Tel 760-942-8505  
Fax 760-942-8515  
[www.coastlawgroup.com](http://www.coastlawgroup.com)

**May 2, 2022**

Juliette Orozco  
County of San Diego  
Planning and Development Services  
5510 Overland Avenue, Suite 110  
San Diego, CA 92101

**Via Electronic Mail**

[Juliette.Orozco@sdcounty.ca.gov](mailto:Juliette.Orozco@sdcounty.ca.gov)

**RE: Escondido Estates Tentative Map; PDS2020-TM-5639; PDS2020-AD-20-007; PDS2020-ER-20-08-007**

Dear Ms. Orozco:

Please accept the following comments regarding the Escondido Estates Tentative Map ("Project") on behalf of our client the Coastal Environmental Rights Foundation. CERF is a nonprofit environmental organization founded by surfers in North San Diego County and active throughout California's coastal communities. CERF was established to aggressively advocate, including through litigation, for the protection and enhancement of coastal natural resources and the quality of life for coastal residents. As detailed below, the Project still does not qualify for CEQA streamlining because of its significant environmental impacts.

**VMT/Transportation Impacts**

Notwithstanding the Project's continuing transportation impacts, it nonetheless attempts to take advantage of the CEQA streamlining provisions in Public Resources Code Section 21083.3 and CEQA Guidelines Section 15183. Because the Project assessment (including the "Statement of Reasons") failed to adequately assess the Project's transportation impacts as required pursuant to CEQA Guidelines Section 15064.3, the applicant prepared a new VMT Report which applies a project-specific significance threshold. However, the VMT Report again misses the mark.

As the Statement of Reasons notes, Senate Bill 743 (SB 743) was "signed into law on September 27, 2013 and changed the way that public agencies evaluate transportation impact under CEQA." (Statement of Reasons, 15183 Exemption Checklist, p. 52). The Statement of Reasons further acknowledges "SB 743 does not prevent a city or county from continuing to analyze delay or LOS as part of other plans (i.e., General Plan), studies, congestion management and transportation improvements, **but these**

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**metrics may no longer constitute the basis for transportation impacts under CEQA analysis as of July 1, 2020.”** (*Id.*, emphasis added).

The newly prepared VMT Report concludes the Project “can be presumed to have a less than significant impact” because it is within a census tract that has an average VMT per capita below the regional mean and it “meets the infill area VMT screening threshold.”<sup>1</sup> First, the County has not adopted a new TSG. The Board gave staff *direction* to return with a revised TSG within six months for Board consideration.<sup>2</sup> Therefore, the Board has neither adopted a significance threshold for CEQA purposes, nor has it substantiated one with substantial evidence.

To the extent the Project aims to support its project-specific thresholds of significance with substantial evidence, it cannot do so here. The County’s technical memo entitled *Infill Areas in Unincorporated San Diego County*, dated October 29, 2021, expressly states:

With guidance from County counsel, the County could use this information to establish a new SB 743 related screening criteria and allow the locations to be screened from performing VMT analysis. **This would require evidence to support the determination that projects in these locations would have a less than significant transportation impact and meet the intent of SB 743.**<sup>3</sup> (emphasis added).

Thus, the evidence to support the use of a new “infill area VMT screening threshold” has not yet been identified – and likely does not exist. Indeed, the VMT Report itself acknowledges:

Upon adoption by the Board of Supervisors, the screening criteria will allow projects located in infill areas and any surrounding “village” to move forward without VMT analysis or mitigation. **The substantial evidence to support the infill areas would be prepared as part of a new Transportation Study Guide (TSG) or a separate VMT screening threshold.** In either case, the new VMT screening threshold will require a public review period prior to consideration and adoption.<sup>4</sup> (emphasis added).

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<sup>1</sup> VMT Report, March 29, 2022, p. 10.

<sup>2</sup> Minutes of Board Action on February 9, 2022, available at <https://bosagenda.sandiegocounty.gov/cob/cosd/cob/doc?id=0901127e80e30161>

<sup>3</sup> Technical Memorandum, Infill Areas in Unincorporated San Diego County, October 29, 2021, p. 10

<sup>4</sup> VMT Report, March 29, 2022, p. 8.

Juliette Orozco  
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The Board directed staff to bring back “infill area options” which include:

1. Option 1-D: New VMT Screening Criteria for Infill Areas that are within Transit Opportunity Areas (TOAs), and
2. Option 1-D-3: infill area plus the village option - minus High and Very High Fire Hazard Severity Zone.

The VMT Report states the Project TAZ (1249) is within an identified “infill area” and would therefore meet the proposed screening criteria without further evidence or analysis.<sup>5</sup> This is insufficient.

As noted above, the County’s proposed screening criteria is not supported by substantial evidence. The record indicates any transportation opportunities within the Project area are far from becoming a reality. The VMT Report notes the Project is identified as within the County-defined “infill area” and 2.5 miles from an identified Mobility Hub. However, the service population density of the Project area does not support expansion of transit or build-out of the Mobility Hub. Further,

Regional transit services within the Unincorporated County are currently limited to a single Sprinter Station (Buena Creek) and a limited number of low frequency rural bus routes. With the implementation of California Senate Bill 743 (SB-743) the California Environmental Quality Act (CEQA) guidelines were revised to strongly encourage the use of vehicle miles traveled (VMT) as the metric in which transportation related impacts are determined. This presents a significant challenge for the Unincorporated County since it is predominantly comprised of lower density suburban and rural communities, not served by transit, which is not ideal for efficient VMT production.<sup>6</sup>

Additionally,

[T]here is only one existing TPA located within the Unincorporated County, at the Buena Creek Sprinter Station. This indicates that there are very few locations within the Unincorporated County in which future development can occur without resulting in a significant VMT related impact.<sup>7</sup>

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<sup>5</sup> Id.

<sup>6</sup> Potential Transit Expansion within the County of San Diego, November 9, 2021, p. 1 (emphasis added),

<sup>7</sup> Id. at p. 3.

As part of the 2021 RTP, there are a limited number of high-frequency regional transit services planned within the unincorporated County, and none are proposed within the North County Metro area.<sup>8</sup> And though a Mobility Hub is identified for the North County Metro area within 2.5 miles of the Project, locations, features, and amenities of individual Mobility Hub sites have not been defined.<sup>9</sup> Therefore, transit expansion to the North County Metro area would require higher density, which the Project area currently lacks.<sup>10</sup> As noted in the County's Memo, to fulfill the County's transit opportunity area plans, the County would have to develop infill/TOD styles for application to development proposals and mitigate for their VMT impacts until transit services are established.<sup>11</sup> Nothing remotely resembling such analysis and mitigation has occurred here. Most importantly, the Project's low density (2 units per acre) single-family residential development frustrates any future attempts to create the density needed to support future transit opportunities.

Further, the VMT Report purportedly relies on a threshold of significance described as "below regional mean VMT per capita" without support.<sup>12</sup> According to the VMT Report, the Project is within Census Tract 207.05, which has a VMT/resident of 18.9.<sup>13</sup> This is 99 percent of the regional mean, which is 19.0 VMT per resident using the 2016-ABM2/2019 RTP SANDAG data. The Board-directed significance threshold, and more importantly the OPR Technical Advisory recommended threshold of significance for new residential projects, is 15 percent below regional mean, which would be 14.25 VMT/resident. The Project clearly exceeds this threshold.

Pursuant to Section 21099, the criteria for determining the significance of transportation impacts must "promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses."<sup>14</sup> As noted in the OPR Technical Advisory, "to achieve the State's long-term climate goals, California needs to reduce per capita VMT."<sup>15</sup> Further, achieving 15 percent lower per capita (residential) VMT than existing development is both generally achievable and is supported by evidence that connects this level of reduction to the State's emissions goals.<sup>16</sup> As a result, the OPR Technical Advisory recommends a proposed project

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<sup>8</sup> Id. at p. 5.

<sup>9</sup> Id. at p. 9.

<sup>10</sup> Id. and Figure 5.

<sup>11</sup> Id. at pp. 18-19.

<sup>12</sup> VMT Report, p. 5, Table B.

<sup>13</sup> Id. at p. 6.

<sup>14</sup> Pub. Res. Code §21099(b)(1); see generally, CEQA Guidelines, § 15064.3(b) [Criteria for Analyzing Transportation Impacts].

<sup>15</sup> OPR Technical Advisory, p.

<sup>16</sup> Id. at p. 12.

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exceeding a level of 15 percent below existing VMT per capita may indicate a significant transportation impact.<sup>17</sup>

Here, use of the appropriate regional baseline as instructed by OPR (and as instructed by the Board) results in a significant transportation impact peculiar to the instant Project.<sup>18</sup> Therefore, the Project results in a significant transportation impact, contrary to the VMT Report.

### **Water Quality Impacts**

The Project's lack of appropriate BMPs also results in a significant water quality impact peculiar to the instant Project.<sup>19</sup> The County's General Plan EIR, certified on August 3, 2011, necessarily did not consider water quality impacts related to inconsistency (or lack thereof) with the latest Regional MS4 Permit and the County's most recent BMP Design Manual. The 15183 Exemption Checklist purports to address this failure by claiming the Project's SWQMP has been prepared in accordance with the 2019 County BMP Design Manual (which is not the latest version) and the MS4 Permit.<sup>20</sup> This is incorrect.

The Project does not include any infiltration BMPs. The SWQMP states "[b]ased on the preliminary geotechnical investigation prepared by Vinje & Middleton Engineering, the project site has an infiltration rate too low to justify feasibility of infiltration BMPs."<sup>21</sup> However, the aforementioned study does not include any infiltration rate information or percolation studies. In addition, neither the SWQMP nor the geotechnical investigation report comply with the County's BMP Design Manual requirements for calculation of infiltration rate assessment.<sup>22</sup>

Therefore, the Project has not shown retention of the 85<sup>th</sup> percentile is not feasible, as required by the MS4 Permit and BMP Design Manual.<sup>23</sup> Because the Project is inconsistent with these requirements, it would result in increased storm water runoff and pollutant loading to downstream impaired waterbodies, resulting in water quality impacts peculiar to the Project.

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<sup>17</sup> Id. at p. 15.

<sup>18</sup> CEQA Guidelines §15183(b)(1)-(3).

<sup>19</sup> CEQA Guidelines §15183(b)(1)-(3).

<sup>20</sup> 15183 Exemption Checklist, pp. 37-38.

<sup>21</sup> SWQMP, Section 7.2.1

<sup>22</sup> County BMP Design Manual, dated September 15, 2020, p. 2-9, and Sections B.2, D.1., and D.2.

<sup>23</sup> See, Id. , p. 1-20, Figure 1-3, and p. 2-8

Juliette Orozco  
**Escondido Estates**  
May 2, 2022  
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**Conclusion**

As a result of the Project's undisclosed significant transportation, water quality, and related impacts, the County's streamlined CEQA analysis is incomplete. Therefore, the CEQA document must be revised to include a detailed analysis of the Project's significant transportation and water quality impacts consistent with CEQA Guidelines Section 15064.3.

Thank you in advance for your consideration of our comments.

Sincerely,

**COAST LAW GROUP LLP**



Livia B. Beaudin  
Attorneys for CERF





NORTH SAN DIEGO COUNTY  
**NAACP**  
 760.754.9686 . www.sdnacp.org



May 2, 2022

Ms. Juliette Orozco, Project Contact  
 County of San Diego  
 Via Email [Juliette.Orozco@sdcounty.ca.gov](mailto:Juliette.Orozco@sdcounty.ca.gov)

**RE: Escondido Community Housing Coalition comments on Escondido Estates,  
 PDS2020-TM-5639**

Dear Ms. Orozco and Smith:

The undersigned members and supporters of the Escondido Community Housing Coalition (EHC) are committed to the creation adequate affordable housing in Escondido and environs. Escondido has a dire need for affordable housing. The most recent Housing Element report found that, in the 5th Housing cycle, Escondido has developed only 13.5% of requirements for very-low income, 17% for low income, and 15% of the goal for moderate, but 119% for above moderate market rate housing. These inequities in housing must be addressed where relevant in planning documents and in project-by-project approvals that are given by the Planning Commissioners and decision-making bodies.

Although this project is located in the County, it will still be part of the Escondido community and rely on Escondido public services. We had a very positive meeting with the project proponents and look forward to working with them on this and future projects.

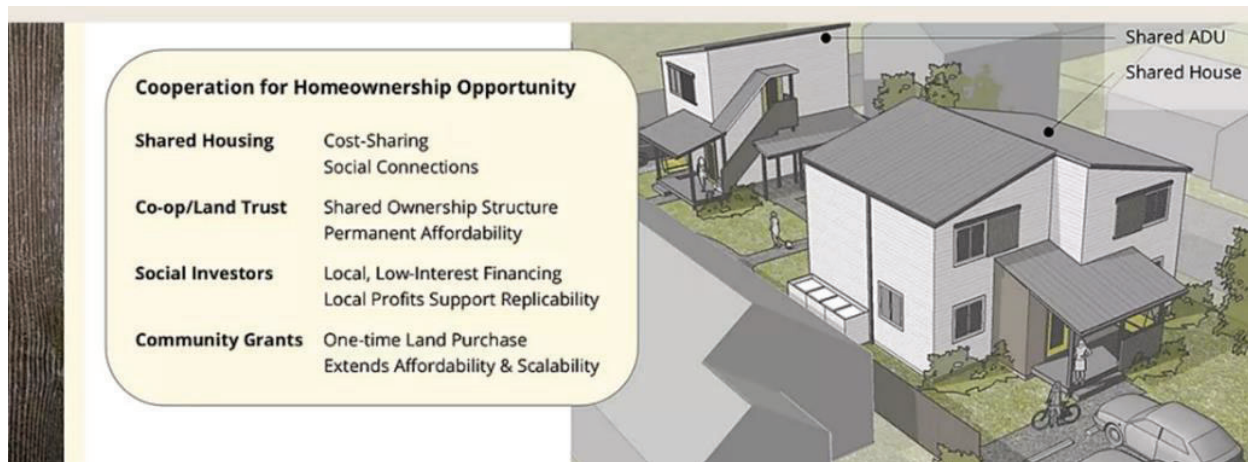
EHC would like to make the following comments and requests related to final approvals of Escondido Estates TM-5639.

**A. Please provide at least four units of affordable/moderate housing in this infill project.**

We request that one or more of the Housing Sites be developed as affordable or moderate cost housing. One model that could be used is one where a large home and lot is divided into duplex or triplex and/or ADU.

One such example is the Re-Villaging Project C Street Coop in Springfield which offers 6 one-bedroom units on 0.1 acres. <https://www.squareonevillages.org/c-street>. This concept serves as a scalable model for developing affordable rental or resident-owned infill housing on typical single-family home lots.

ECHC views this as a very reasonable request that will result increase affordable housing units in this infill project. We request the County make this a commitment for the project.



### **B. Other requirements to promote resilience and health should be included.**

1. We support the inclusion of PV panels on all the homes. However, if not already included, the project must require all units to be all electric. This is necessary to reduce GHG emissions from the homes. For example, natural gas stoves emit climate altering methane even when they are not in use. Further, natural gas contributes to unhealthy indoor air quality.
2. All landscaping should be native plantings to support ecological resilience and/or fruit or other edible landscaping to contribute to food access. The landscaping plan should include one tree per person living in the project and should provide adequate cooling zones as needed.
3. All projects should include or demonstrate easy access to transit options and provide shade for any transit waiting stops.
4. All projects should facilitate healthy activities such as walking and biking.
5. Any common areas should be tobacco-free.

Thank you for the consideration of our comments. Please communicate with us the results of your actions. We can be reached at [escohousingcoalition@gmail.com](mailto:escohousingcoalition@gmail.com).

Sincerely,

*Robert Jenkins, North San Diego County NAACP  
Yusef Miller, North County Equity and Justice Coalition  
Madison Coleman, Climate Action Campaign  
Yazmin Doroteo, North County Resident  
Xochitl Castillo, Escondido Resident  
Emilia Ruiz Venegas, Escondido Resident  
Dao Doan, Escondido Resident*

*Estela De Los Rios, CSA San Diego County  
Laura Hunter, Sierra Club North County Group  
Christine Nava, Escondido Resident  
Joanne Tenney, Escondido Resident  
Nico Calavita, Professor Emeritus, San Diego State University  
Rick Bates, UNITEHERE Local 30*

cc. Ms. Ashley Smith, Chief, Project Planning



810 Mission Avenue  
Oceanside, CA 92054  
(760) 966-6500  
(760) 967-2001 (fax)  
GoNCTD.com

May 3, 2022

Ms. Juliette Orozco  
County of San Diego  
5510 Overland Avenue, Suite 310  
San Diego, CA 92123  
Sent Via Electronic Mail: Juliette.Orozco@sdcounty.ca.gov

Re: Design Review - Escondido Estates Tentative Map: PDS2020-TM-5639;  
PDS2020-AD-20-007; PDS2020-ER-20-08-007

Dear Ms. Orozco:

Thank you for the opportunity to review the public improvements on Escondido Estates Tentative Map, based on the notice received on March 30, 2022.

Upon review of the notice received by the North County Transit District (NCTD) NCTD has determined that there is a BREEZE FLEX Route 371 traveling adjacent to the site and recommends the construction of two (2) corresponding five (5) foot by eight (8) foot ADA compliant bus stop alighting pads with shelters on San Pasqual Valley Rd at the intersection of Idaho Avenue, connecting to the planned sidewalk, and a safe pedestrian crossing on San Pasqual. This will allow ease in bidirectional transit access for future residents of this development.

The design should be consistent with NCTD standards and include the following:

- An eight (8) foot-deep by five (5) foot-wide concrete boarding and alighting area that meets standards set forth by the Americans with Disabilities Act (ADA)
- Additional desirable amenities include lighting, seating, bike parking, and a shelter

**Transit Oriented Development (TOD)/Pedestrian Access:**

NCTD highly recommends that the project site design allows for sufficient ADA paths for connecting pedestrians from within your future development to nearby bus stops, sidewalks, and crosswalks. To make your development pedestrian and bike

friendly, NCTD highly encourages you to provide shading from trees or structures, lighting, bike racks, and seating.

As described in NCTD’s Bus Stop Development Handbook (2018), new developments should be designed to provide clear and direct access to bus stops (existing or new), and should emphasize pedestrian access, activity, and safety.

- Gated or walled developments should provide openings through walls to minimize the walking distance and provide a more direct route to bus stops.
- Developments with parking lots should be designed with clear pedestrian walkways.
- Distinct walkway networks should be provided where bus stops and/or transit centers can be linked with building entrances.
- Entrances to buildings should face the street with pedestrian access located close to the nearest bus stop.

Below is a sample of Guidelines for design supported by NCTD, as found in our Bus Stop Development Handbook (2018).

<b>Key Transit Supportive Design and Development Guidelines Supported by NCTD</b>
<ul style="list-style-type: none"> <li>● Orient developments towards the street, with parking located to the rear of buildings rather than along the street frontage.</li> </ul>
<ul style="list-style-type: none"> <li>● Building design and circulation plans should minimize the need for parking and increase the opportunity for transit and active transportation.</li> </ul>
<ul style="list-style-type: none"> <li>● Bus stop and station elements should be incorporated into the design, in addition to other public spaces like walkways, bicycle paths, and street furniture.</li> </ul>
<ul style="list-style-type: none"> <li>● Emphasize compatible and compact land uses that enable convenient access to and from bus routes, and that are designed to provide connections to a variety of uses (i.e., residential, employment, educational, and commercial).</li> </ul>
<ul style="list-style-type: none"> <li>● Minimize walk distances through developments to bus stops, especially those with walls or gates, so that transit is accessible to most patrons or residents.</li> </ul>

**Detours Required:**

In addition, NCTD has found that the construction may take place in the right-of-way of NCTD BREEZE Route 371. NCTD requests that you or your contractor provide notice two (2) weeks prior to starting work so that we may send a supervisor to meet with your construction crew to determine if your traffic control methods affect NCTD’s stops. Notice should be provided via e-mail to [detours@nctd.org](mailto:detours@nctd.org).

Re: Design Review - Escondido Estates Tentative Map: PDS2020-TM; PDS2020-AD-20-007;  
PDS2020-ER-20-08-007

May 3, 2022

Page 3 of 3

Thank you again for allowing NCTD to review and comment on this project. Should you have any questions related to this review, feel free to contact me at (760) 966-6683 or via e-mail at [kpersons@nctd.org](mailto:kpersons@nctd.org).

Sincerely,



Katie Persons  
Director of Service Planning

cc: Damon Blythe, Chief Operations Officer – Bus Operations, NCTD  
Chris Orlando, Chief of Planning, Advocacy, and Marketing, NCTD  
Ioni Tcholakova, Transit Planner, NCTD

## California Department of Transportation

DISTRICT 11  
4050 TAYLOR STREET, MS-240  
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May 2, 2022

11-SD-78  
PM 19.90

Tentative Map 5639, Escondido Estates  
PDS2020-TM-5639, PDS2020-AD-007, PDS2020-ER-20-08-007  
Notice of Additional Information Regarding Vehicle Miles  
Traveled for Escondido Estates Tentative Map

Ms. Juliette Orozco  
County of San Diego  
Department of Planning and Development Services  
5510 Overland Avenue, Suite 310  
San Diego, CA 92123

Dear Ms. Orozco:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Notice of Additional Information Regarding Vehicle Miles Traveled for the Escondido Estates Tentative Map 5639 Project located near State Route 78 (SR-78). The mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respects the environment. The Local Development Review (LDR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities.

Safety is one of Caltrans' strategic goals. Caltrans strives to make the year 2050 the first year without a single death or serious injury on California's roads. We are striving for more equitable outcomes for the transportation network's diverse users. To achieve these ambitious goals, we will pursue meaningful collaboration with our partners. We encourage the implementation of new technologies, innovations, and best practices that will enhance the safety on the transportation network. These pursuits are both ambitious and urgent, and their accomplishment involves a focused departure from the status quo as we continue to institutionalize safety in all our work.

We look forward to working with the County of San Diego in areas where the County and Caltrans have joint jurisdiction to improve the transportation network and connections between various modes of travel, with the goal of improving the experience of those who use the transportation system.

Ms. Juliette Orozco

May 2, 2022

Page 2

Caltrans has the following comments:

## **Hydrology and Drainage Studies**

- Caltrans generally does not allow development projects to impact hydraulics within the State's Right-of-Way (R/W). Any modification to the existing Caltrans drainage and/or increase in runoff to State facilities will not be allowed.
- More specific project comments are forthcoming from our Hydraulics Branch on the revised Preliminary Hydrology Report (dated: June 29, 2021), and the Preliminary Grading Plan for Tentative Map #5639 (dated: May 4, 2021).

## **Complete Streets and Mobility Network**

Caltrans views all transportation improvements as opportunities to improve safety, access and mobility for all travelers in California and recognizes bicycle, pedestrian and transit modes as integral elements of the transportation network. Caltrans supports improved transit accommodation through the provision of Park and Ride facilities, improved bicycle and pedestrian access and safety improvements, signal prioritization for transit, bus on shoulders, ramp improvements, or other enhancements that promotes a complete and integrated transportation network. Early coordination with Caltrans, in locations that may affect both Caltrans and the County of San Diego, is encouraged.

To reduce greenhouse gas emissions and achieve California's Climate Change target, Caltrans is implementing Complete Streets and Climate Change policies into State Highway Operations and Protection Program (SHOPP) projects to meet multi-modal mobility needs. Caltrans looks forward to working with the County to evaluate potential Complete Streets projects.

Bicycle, pedestrian, and public transit access during construction is important. Mitigation to maintain bicycle, pedestrian, and public transit access during construction is in accordance with Caltrans' goals and policies.

## **Design**

The project ID referenced on sheet 2 of 3 for Tentative Map #5639 (dated: 05-04-2021) and in the Preliminary Grading Plan TM5639 (dated: 05-04-2021) is missing a "1", it should be listed as 1115000042. Please see attachment.

Ms. Juliette Orozco

May 2, 2022

Page 3

## **Land Use and Smart Growth**

Caltrans recognizes there is a strong link between transportation and land use. Development can have a significant impact on traffic and congestion on State transportation facilities. In particular, the pattern of land use can affect both local vehicle miles traveled and the number of trips. Caltrans supports collaboration with local agencies to work towards a safe, functional, interconnected, multi-modal transportation network integrated through applicable "smart growth" type land use planning and policies.

The County should continue to coordinate with Caltrans to implement necessary improvements at intersections and interchanges where the agencies have joint jurisdiction.

## **Traffic Control Plan/Hauling**

Caltrans has discretionary authority with respect to highways under its jurisdiction and may, upon application and if good cause appears, issue a special permit to operate or move a vehicle or combination of vehicles or special mobile equipment of a size or weight of vehicle or load exceeding the maximum limitations specified in the California Vehicle Code. The Caltrans Transportation Permits Issuance Branch is responsible for the issuance of these special transportation permits for oversize/overweight vehicles on the State Highway network. Additional information is provided online at: <http://www.dot.ca.gov/trafficops/permits/index.html>

A Traffic Control Plan is to be submitted to Caltrans District 11, including the intersections along SR-78 within the project area, at least 30 days prior to the start of any construction. Traffic shall not be unreasonably delayed. The plan shall also outline suggested detours to use during closures, including routes and signage.

Potential impacts to the highway facilities (SR-78) and traveling public from the detour, demolition and other construction activities should be discussed and addressed before work begins.

## **Noise**

The applicant must be informed that in accordance with 23 Code of Federal Regulations (CFR) 772, Caltrans is not responsible for existing or future traffic noise impacts associated with the existing configuration of SR-78.



Ms. Juliette Orozco

May 2, 2022

Page 4

## **Environmental**

### Air Quality

The Air Quality Assessment dated 5/26/21 and the Greenhouse Gas Emissions section of the 15183 Exemption Checklist has satisfied the requirements to evaluate and address air quality impacts from the proposed project.

### Hazardous Waste

There was no EIR/ISA in the application package to review. The Hazards and Hazardous Material section of the 15183 Exemption Checklist has satisfied the requirements to evaluate and address hazardous waste impacts from the proposed project.

A hazardous waste concern for this project is aerially deposited lead (ADL). Elevated levels of ADL are common in the soil adjacent to State highways and can also be found underneath some existing road surfaces due to past construction activities. ADL is usually found within 30 feet of the edge of the pavement and within the top six inches of the soil. In some cases, the lead is as deep as two to three feet below the surface. The Department of Toxic Substances Control (DTSC) sets regulatory thresholds for lead in soil, based on risk assessment work performed by CalEPA's Office of Environmental Health Hazard Assessment (OEHHA). It is the Permittee's responsibility to comply with the DTSC ADL requirements for roadway soil management.

### Noise

The Noise Assessment dated 6/4/21 has satisfied the requirements to evaluate and address noise impacts from the proposed development.

It should be recognized that definition and evaluation of geologic and environmental conditions are a difficult and inexact science. Judgments leading to conclusions and recommendations are generally made with incomplete knowledge of the subsurface conditions present due to the limitations of data from field studies. Although risk can never be eliminated, more detailed and extensive studies yield more information, which may help understand and manage the level of risk.

## **Broadband**

Caltrans recognizes that teleworking and remote learning lessen the impacts of traffic on our roadways and surrounding communities. This reduces the amount of VMT and decreases the amount of greenhouse gas (GHG) emissions and other pollutants. The availability of affordable and reliable, high speed broadband is a key component in

Ms. Juliette Orozco  
May 2, 2022  
Page 5

supporting travel demand management and reaching the state's transportation and climate action goals.

**Right-of-Way**

- Per Business and Profession Code 8771, perpetuation of survey monuments by a licensed land surveyor is required, if they are being destroyed by any construction.
- Any work performed within Caltrans' R/W will require discretionary review and approval by Caltrans and an encroachment permit will be required for any work within the Caltrans' R/W prior to construction.

Additional information regarding encroachment permits may be obtained by contacting the Caltrans Permits Office at (619) 688-6158 or emailing [D11.Permits@dot.ca.gov](mailto:D11.Permits@dot.ca.gov) or by visiting the website at <https://dot.ca.gov/programs/traffic-operations/ep>. Early coordination with Caltrans is strongly advised for all encroachment permits.

If you have any questions or concerns, please contact Charlie Lecourtois, LDR Coordinator, at (619) 985-4766 or by e-mail sent to [Charlie.Lecourtois@dot.ca.gov](mailto:Charlie.Lecourtois@dot.ca.gov).

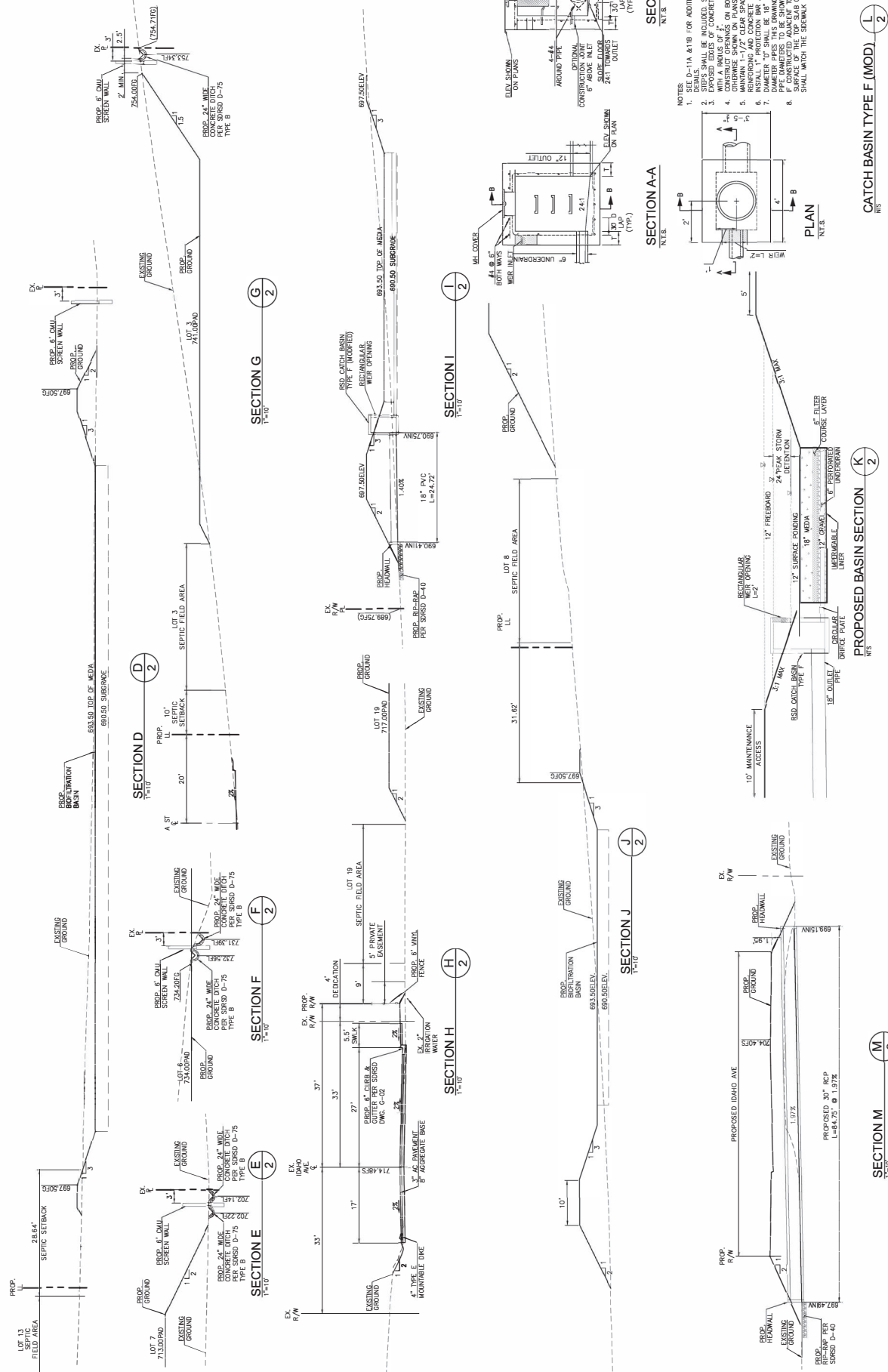
Sincerely,

*Maurice A. Eaton*

MAURICE EATON  
Branch Chief  
Local Development Review

Attachment – Preliminary Grading Plan TM 5639 Highlighted Item from Design Branch

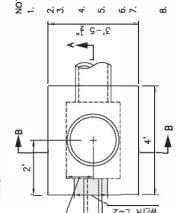




- NOTES:
1. SEE 6-11A & 11B FOR ADDITIONAL NOTES AND DETAILS.
  2. STEPS SHALL BE INCLUDED SEE 11A FOR DETAILS.
  3. ALL CONCRETE SHALL BE REINFORCED WITH A GRADE OF 2.
  4. CONSTRUCT OPENINGS ON BOTH SIDE UNLESS OTHERWISE NOTED.
  5. MAINTAIN 1-1/2" CLEAR SPACING BETWEEN REINFORCEMENT AND CONCRETE SURFACE.
  6. DIAMETER SHALL BE 18" MAX. FOR LARGER PIPE DIAMETERS TO BE SHOWN ON PLAN, MODIFIED.
  7. IF CONSTRUCTED ADJACENT TO A SIDEWALK, THE CONSTRUCTION SHALL BE SHOWN ON PLAN. THIS SHALL MATCH THE SIDEWALKS SLOPE AND FINISH.

SECTION B-B  
N.T.S.

SECTION A-A  
N.T.S.



PLAN  
N.T.S.

CATCH BASIN TYPE F (MOD) 2

PROPOSED BASIN SECTION K 2

SECTION M 2

SECTIONS & DETAILS  
**ESCONDIDO ESTATES**  
 TM 5639  
 COUNTY OF SAN DIEGO, CALIFORNIA



**X ENGINEERING & CONSULTING, INC.**  
 6 Hudson Center Drive, Suite 650  
 Escondido, California 92029  
 949.522.7100 | xengineeringinc.com



BY	DATE	REVISIONS

PREPARED BY: \_\_\_\_\_





## California Department of Transportation

DISTRICT 11  
4050 TAYLOR STREET, MS-240  
SAN DIEGO, CA 92110  
(619) 709-5152 | FAX (619) 688-4299 TTY 711  
[www.dot.ca.gov](http://www.dot.ca.gov)



May 9, 2022

11-SD-78  
PM 19.90

Tentative Map 5639, Escondido Estates  
PDS2020-TM-5639, PDS2020-AD-007, PDS2020-ER-20-08-007  
Notice of Additional Information Regarding Vehicle Miles  
Traveled for Escondido Estates Tentative Map

Ms. Juliette Orozco  
County of San Diego  
Department of Planning and Development Services  
5510 Overland Avenue, Suite 310  
San Diego, CA 92123

Dear Ms. Orozco:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the Notice of Additional Information Regarding Vehicle Miles Traveled for the Escondido Estates Tentative Map 5639 Project located near State Route 78 (SR-78). The mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respects the environment. The Local Development Review (LDR) Program reviews land use projects and plans to ensure consistency with our mission and state planning priorities.

Caltrans has the following additional comments for the May 2, 2022, comment letter:

### Traffic Engineering and Analysis

- What is the reason for re-aligning the mainline striping/alignment on Idaho Avenue to curve to the south? Provide truck turn templates showing trucks can turn without crossing over the proposed revised striping/alignment for all four legs. Surveys and Design would have to approve the alignment changes/proposed striping. Please see Traffic Engineering and Analysis's redline comments attached.

Ms. Juliette Orozco

May 9, 2022

Page 2

## Hydrology and Drainage Studies

- Comment number two has not been addressed from our previous comment letter dated April 8, 2021, for the Preliminary Hydrology Report (i.e., Provide existing and proposed condition headwater elevation inundation delineation). Please see the April 8, 2021, Caltrans comment letter attached for your reference.
- Remove the word floodplain as floodplain indicates a regulated area. Remove references to floodplain and flood hazard areas.
- The eastern line is not addressed on the existing plan (it is not indicated clearly).
- Comment number four has not been addressed from our previous comment letter dated April 8, 2021, for the Preliminary Hydrology Report (i.e., Where is the eastern 100-year flood line of inundation).
- Applicant has not complied with comment six from our previous comment letter dated April 8, 2021, for the Preliminary Hydrology Report (i.e., Provide an overflow device for the detention basin). The basin opening provided is conflicting. It is showing an orifice opening and calling out a weir. Provide additional detail.
- Applicant has not complied with comment eight sub comment two from our previous comment letter dated April 8, 2021, for the Preliminary Hydrology Report regarding the 30" CMP culvert.



Ms. Juliette Orozco

May 9, 2022

Page 3

- Applicant did not address comment number 12 from our previous comment letter dated April 8, 2021, for the Preliminary Hydrology Report (i.e., Show cross section locations used for all irregular channel flow travel time between nodes). No cross sections for irregular channel flow.

If you have any questions or concerns, please contact Charlie Lecourtois, LDR Coordinator, at (619) 985-4766 or by e-mail sent to [Charlie.Lecourtois@dot.ca.gov](mailto:Charlie.Lecourtois@dot.ca.gov).

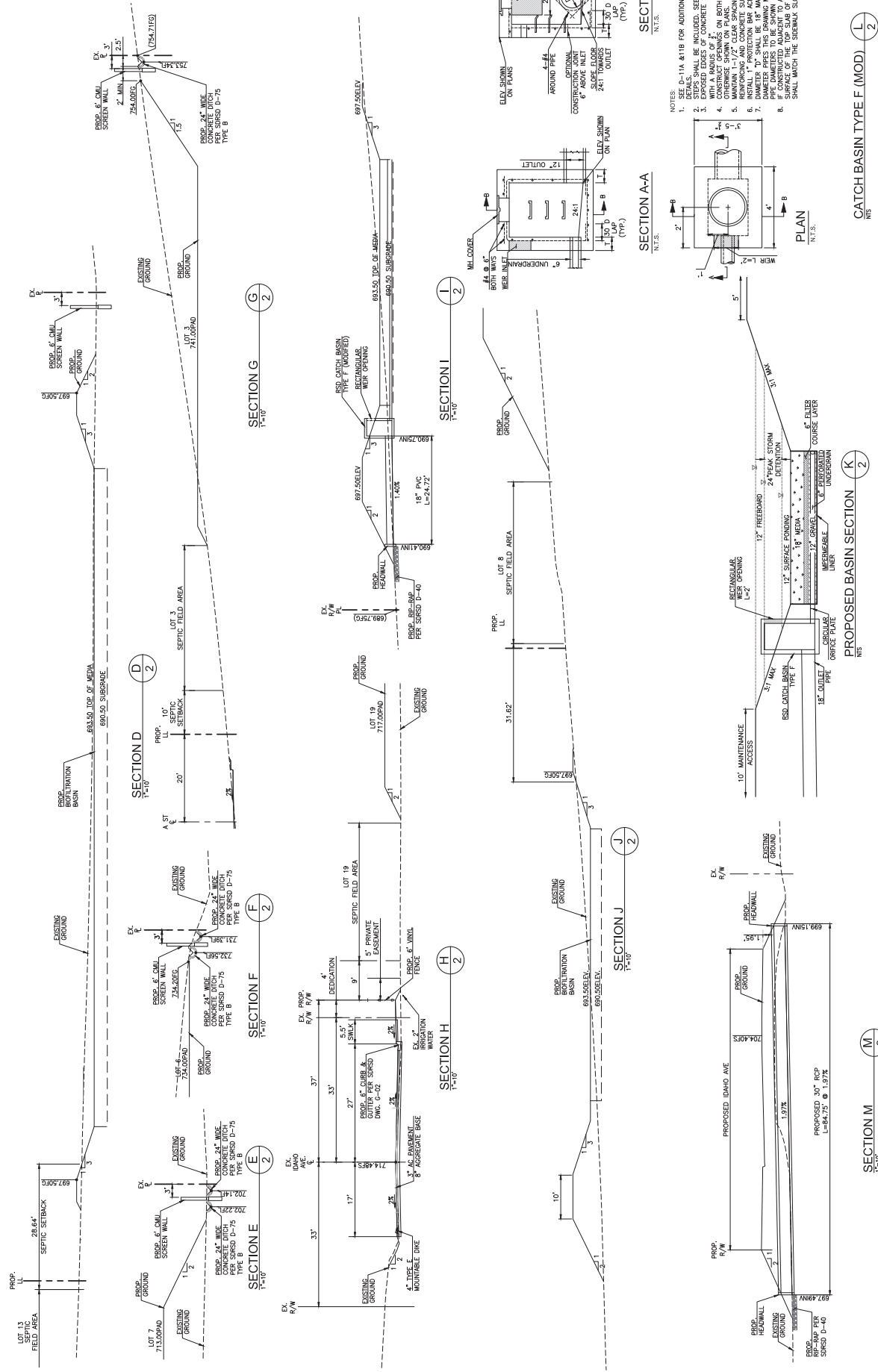
Sincerely,

*Maurice A. Eaton*

MAURICE EATON  
Branch Chief  
Local Development Review

Attachment – Preliminary Grading Plan\_TM5639\_TE&A Redline Cmmnts,  
CT\_Ltr\_County of San Diego – TTM 5639 Hydro Report 04-08-2021





- NOTES:
1. DETAILS 6-11A & 11B FOR ADDITIONAL NOTES AND DETAILS.
  2. STEPS SHALL BE INCLUDED. SEE 11A FOR DETAILS.
  3. ALL CONCRETE SHALL BE ROUNDED WITH A RADIUS OF 2\".
  4. CONSTRUCT OPENINGS ON BOTH SIDE UNLESS OTHERWISE NOTED.
  5. MAINTAIN 1-1/2\" CLEAR SPACING BETWEEN REINFORCING BARS AND CONCRETE SURFACE.
  6. DIAMETER SHALL BE 18\" MAX. FOR LARGER DIAMETER OPENINGS TO BE SHOWN ON PLAN.
  7. IF CONSTRUCTED ADJACENT TO A SIDEWALK, THE PIPE SHALL BE SET TO BE SHOWN ON PLAN.
  8. SHALL MATCH THE SIDEWALK SLOPE AND FINISH.

SECTIONS & DETAILS  
**ESCONDIDO ESTATES**  
 TM 5639  
 COUNTY OF SAN DIEGO, CALIFORNIA

PREPARED BY:

**ENGINEERING & CONSULTING, INC.**  
 1155 LA JOLLA VILLAGE DRIVE, SUITE 100  
 SAN DIEGO, CALIFORNIA 92161  
 619-594-8888 | [www.eciinc.com](http://www.eciinc.com)

REGISTERED PROFESSIONAL ENGINEER  
 LICENSE NO. 44224  
 CIVIL

NO.	DATE	REVISIONS

SECTION M 1"=10' (M) 2

SECTION L 1"=10' (L) 2

SECTION K 1"=10' (K) 2

SECTION J 1"=10' (J) 2

SECTION I 1"=10' (I) 2

SECTION H 1"=10' (H) 2

SECTION G 1"=10' (G) 2

SECTION F 1"=10' (F) 2

SECTION E 1"=10' (E) 2

SECTION D 1"=10' (D) 2

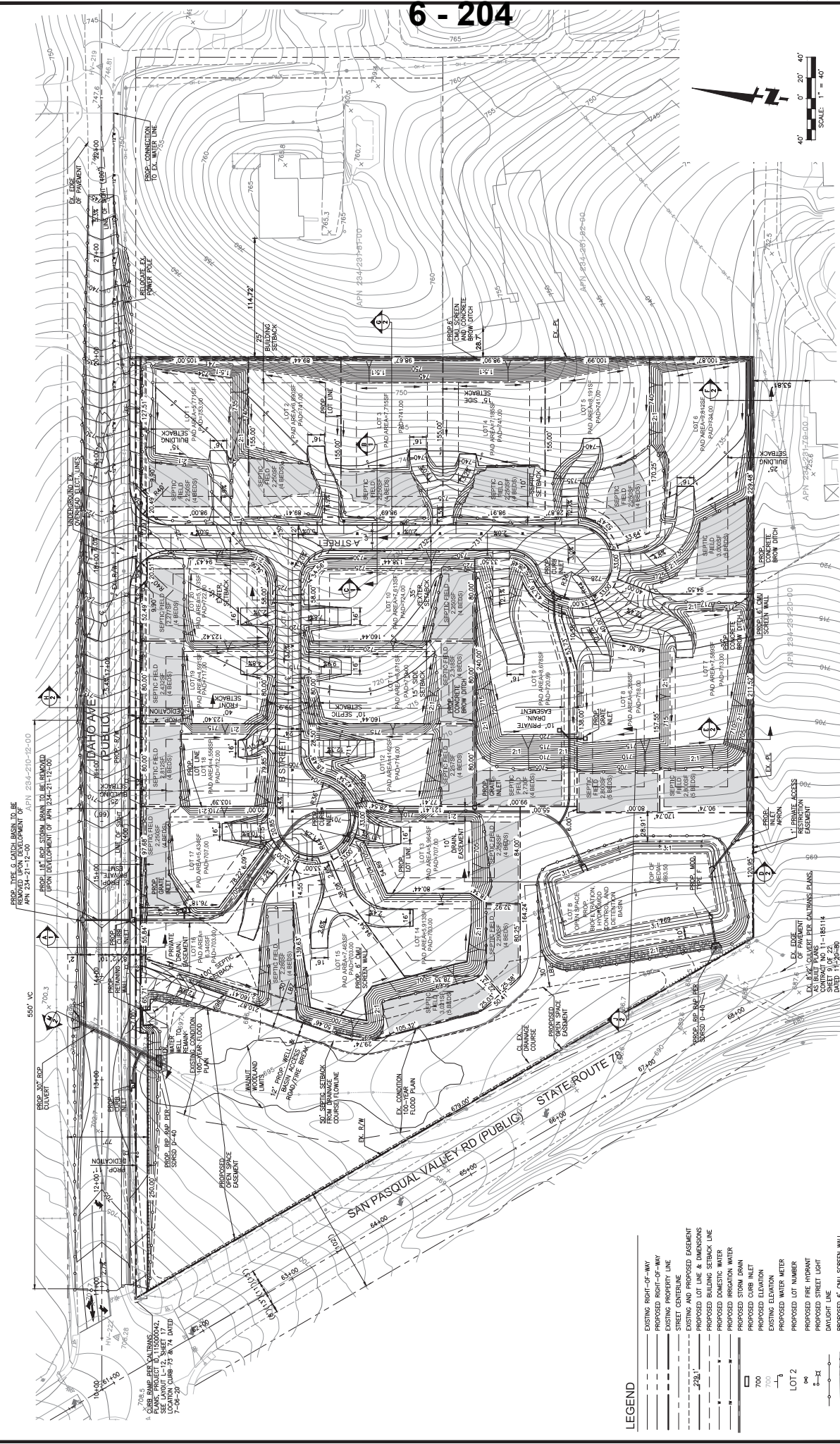
SECTION CATCH BASIN TYPE F (MOD) (L) 2

ENGINEER'S SEAL  
 LICENSE NO. 4024  
 CIVIL ENGINEER

ENGINEERING & CONSULTING, INC.  
 10000 SAN DIEGO AVENUE, SUITE 100  
 SAN DIEGO, CALIFORNIA 92126  
 619-592-7871 | www.eci-engineering.com

PREPARED BY: [Signature]

NO.	DATE	REVISIONS
1		
2		
3		
4		



- LEGEND**
- EXISTING RIGHT-OF-WAY
  - PROPOSED RIGHT-OF-WAY
  - EXISTING PROPERTY LINE
  - STREET CENTERLINE
  - EXISTING AND PROPOSED DOWNSLOPE
  - PROPOSED LOT LINE & DIMENSIONS
  - EXISTING BACKLASH LINE
  - PROPOSED ROADSIDE WATER
  - PROPOSED ROADSIDE WATER
  - PROPOSED STORM DRAIN
  - PROPOSED CURB INLET
  - PROPOSED ELEVATION
  - EXISTING ELEVATION
  - PROPOSED WATER METER
  - PROPOSED LOT NUMBER
  - PROPOSED FIRE HYDRANT
  - PROPOSED STREET LIGHT
  - DAYLIGHT LINE
  - PROPOSED 6' CUM SCREEN WALL
  - PROPOSED SEPTIC FIELD AREA
  - DIRECTION OF FLOW
  - RELINQUISHED ABUTTERS RIGHTS
  - EASEMENT
  - PROPOSED RIDGE LINE
  - PROPOSED CUT & FILL LINE

PROJ. NO. 234-21-12-00  
 APN 234-21-12-00  
 PROJECT: 18" RCP STORM DRAIN TO BE INSTALLED  
 UPON DEVELOPMENT OF APN 234-21-12-00

PROJ. NO. 234-21-12-00  
 APN 234-21-12-00  
 PROJECT: 18" RCP STORM DRAIN TO BE INSTALLED  
 UPON DEVELOPMENT OF APN 234-21-12-00

PROJ. NO. 234-21-12-00  
 APN 234-21-12-00  
 PROJECT: 18" RCP STORM DRAIN TO BE INSTALLED  
 UPON DEVELOPMENT OF APN 234-21-12-00

4. CURB RAMP PER CALTRANS 645  
 SEE LAYOUT L-2, SHEET 77  
 CONSTRUCTION CURBS 75 & 74, DATUM  
 7499.00

550' VC  
 700.3

PROJ. NO. 234-21-12-00  
 APN 234-21-12-00  
 PROJECT: 18" RCP STORM DRAIN TO BE INSTALLED  
 UPON DEVELOPMENT OF APN 234-21-12-00



## California Department of Transportation

DISTRICT 11  
 4050 TAYLOR STREET, MS-240  
 SAN DIEGO, CA 92110  
 (619) 709-5152 | FAX (619) 688-4299 TTY 711  
[www.dot.ca.gov](http://www.dot.ca.gov)



April 8, 2021

11-SD-78  
 PM 20.05  
 TTM 5639, Escondido Estates  
 PDS2020-RM-5639  
 Preliminary Hydrology Report

Mr. Hunter McDonald  
 Land Use/Environmental Planner  
 County of San Diego  
 Department of Planning and Development Services  
 5510 Overland Avenue, Suite 310  
 San Diego, CA 92123

Dear Mr. McDonald:

Thank you for including the California Department of Transportation (Caltrans) in the review of the Preliminary Hydrology Report for Tentative Tract Map No. 5639 – Escondido Estates located near SR-78 and Idaho Avenue, east of Escondido. The mission of Caltrans is to provide a safe and reliable transportation network that serves all people and respects the environment. The Local Development-Intergovernmental Review (LD-IGR) Program reviews land use projects and plans to ensure consistency with Caltrans' mission and state planning priorities.

Caltrans has the following comments:

- The existing cross culvert at Idaho Avenue is a 30" Corrugated Metal Pipe (CMP), the proposed cross culvert is 4'x2' box culvert, which has a much greater capacity. The 30" CMP currently meters water that drains to the existing downstream Caltrans 2' X 8' Reinforced Concrete Box (RCB) culvert, whereas the proposed new box culvert will not. Provide existing and proposed headwater calculations for the Caltrans RCB. The existing condition headwater calculations should consider the Q limited by passing through the 30" CMP and the post condition calculations should consider the Q passing through the proposed box. Provide hydrographs, if necessary.
- Provide existing and proposed condition headwater elevation inundation delineation for the existing Caltrans culvert in Figure 1 and Figure 3.
- Provide contour elevation labels for all detention basin contour lines.

- Where is the eastern 100-year flood line of inundation in Figure 1 and Figure 3?
- Provide a detail for the detention basin riser openings.
- Provide an overflow device for the detention basin.
- Page 6, Paragraph 1 refers to the drainage course as a stream. Subsequent paragraphs refer to it as a drainage course. Is this a stream? Or a drainage course?
- Section III.c.
  - Paragraph 1 states that the runoff quantities are generated from the 100-year, 1-hour storm. This storm is not an acceptable design storm. Please update all calculations to reflect the correct design storm event.
  - Provide existing condition calculations summary for the offsite area draining to the 30" CMP culvert.
  - Table III.1
    - Areas for nodes does not equal the areas denoted in Figures 1 and 2. Show calculations to demonstrate how areas were calculated.
  - Table III.4
    - Area A4 appears to be pavement. Show calculations on this C value determination to demonstrate 0.81 is justified. Delineate areas of different C values.
    - Area A5 appears to have pervious pavement included in the area. Show calculations on this C value to demonstrate 0.36 is justified.
    - Areas A-6 appear to be mostly pavement. Show calculations on this C value to demonstrate 0.78 is justified. Delineate areas of different C values.
    - Area A-7 appears to be pavement. Show calculations on this C value to demonstrate 0.60 is justified. Delineate areas of different C values.
- Section IVa
  - Table IV.4 - The runoff coefficients used for many of the proposed area seem too low. Provide justification and of the C values presented.
- Section IVb
  - This paragraph states that the time of concentration is decreased in the proposed condition. How was the time of concentration decreased?
- Appendix A
  - Nodes in the table in Figure 2 do not match the nodes on the map.
  - Labels for Figure 3 have the same names in Figure 2. Each area is to have a unique name. Please revise.
  - Labels for Figure 3 have different names for the same areas in Figure 1. These should be the same. Please revise.

- Appendix B
  - Calculations are not labeled. Provide clear labeling.
  - Organize the calculations in a logical order.
  - The 24-hour precipitation in inches shown on the first page seems too low. Show location of site on the County's isopluvial maps for the 6-hour and the 24-hour 100-year storm.
  - Show node 103.
  - Show cross section locations used for all irregular channel flow travel time between nodes.
  - Length between 102 and 103 does not match Appendix A mapping.
  - Length between 103 and 104 does not match Appendix A mapping.
  - Provide an explanation of what the user defined information represents.
  - 105 Node label is incorrect between 104 and 105.
  - 105 to 105 node label is incorrect.
  - Length between nodes 105 and 106 does not match Appendix A mapping.
  - For nodes 107 to 114 provide the cross section for the calculations that contains the flow.
  - Why is there zero runoff calculated for area A-8? This area contributes a flowrate to the overall area.
  - Length between 108 and 109 does not match Appendix A mapping.
  - High and low elevations between 108 and 109 does not match Appendix A mapping.
  - Upstream point elevation for 109 does not match Appendix A mapping.
  - Flow length between 109 and 110 is missing from appendix A mapping.
  - Why is there an Ai value for area A-10?
  - Downstream point elevation for 113 does not match Appendix A mapping.
  - Flow length between 113 and 114 does not match Appendix A mapping.
  - Where are nodes 501-505? They are not shown in Appendix A mapping.
  - Why is the flow length between 102 and 103 0.75ft? Please revise.
  - Why are the gutters reported as a 2% cross slope?
  - Will the proposed streets be asphalt or concrete?
  - Why is the 'C' value between node 105 and 106 reported as 0.36? The 'C' value used should reflect the residential density for the entire development.
  - The elevation for 108 does not match appendix A mapping
  - Why is the 'C' value between node 109 and 110 reported as 0.36? The 'C' value used should reflect the residential density for the entire development.
  - The elevation for node 111 does not match Appendix A mapping.
  - Why is the 'C' value between node 112 and 112 reported as 0.45? The 'C' value used should reflect the residential density for the entire development.



Mr. Mr. Hunter McDonald, Land Use/Environmental Planner

April 8, 2021

Page 4

- Why is the 'C' value between node 115 and 116 reported as 045 with an Ai of 0.250?
- Why is A-15 and A-16 being added in as a sub area flow when it was shown as a confluence at node 122?
- Where are the calculations for node 121 to 122?
- Detention Basin Data submittal is not sufficient. This includes but is not limited to:
  - Hydrographs graphs existing and proposed.
  - Stage vs storage tables and graphs.
  - Stage vs area tables and graphs.
  - Stage vs discharge tables and graphs.
  - Inflow vs Outflow tables and graphs.

If you have any questions, please contact Mark McCumsey at (619) 985-4957 or by email at [mark.mccumsey@dot.ca.gov](mailto:mark.mccumsey@dot.ca.gov).

Sincerely,

*Maurice A. Eaton*

MAURICE EATON

Branch Chief

Local Development and Intergovernmental Review

**Attachment G – Service Availability Forms**



County of San Diego, Planning & Development Services
PROJECT FACILITY AVAILABILITY - FIRE
ZONING DIVISION

Please type or use pen

Escondido Estates, LLC c/o Oscar Uranga (949) 933-4103
Owner's Name Phone
19782 MacArthur Boulevard, Suite 300
Owner's Mailing Address Street
Irvine CA 92612
City State Zip

ORG
ACCT
ACT
TASK
DATE AMT \$

F

DISTRICT CASHIER'S USE ONLY

SECTION 1. PROJECT DESCRIPTION TO BE COMPLETED BY APPLICANT

A. Major Subdivision (TM) Specific Plan or Specific Plan Amendment
Minor Subdivision (TPM) Certificate of Compliance:
Boundary Adjustment
Rezone (Reclassification) from to zone.
Major Use Permit (MUP), purpose:
Time Extension...Case No.
Expired Map...Case No.
Other
B. Residential Total number of dwelling units 20
Commercial Gross floor area
Industrial Gross floor area
Other Gross floor area
C. Total Project acreage 10.28 Total lots 20 Smallest proposed lot 9,602sf

Table with 2 columns: Assessor's Parcel Number(s) (Add extra if necessary). Row 1: 234-231-01

Thomas Guide. Page Grid
San Pasqual Valley Road & Idaho Avenue
Project address Street
North County Metropolitan 92027
Community Planning Area/Subregion Zip

OWNER/APPLICANT AGREES TO COMPLETE ALL CONDITIONS REQUIRED BY THE DISTRICT.

Applicant's Signature: Date: 11/10/20
Address: 19782 MacArthur Boulevard, Suite 300, Irvine CA, 926 Phone: (949) 933-4103
(On completion of above, present to the district that provides fire protection to complete Section 2 and 3 below.)

SECTION 2: FACILITY AVAILABILITY TO BE COMPLETED BY DISTRICT

District Name: Escondido Fire Department
Indicate the location and distance of the primary fire station that will serve the proposed project:
Sta 2, 421 N Midway Dr 1.8 miles 4 mins
A. Project is in the District and eligible for service.
Project is not in the District but is within its Sphere of Influence boundary, owner must apply for annexation.
Project is not in the District and not within its Sphere of Influence boundary.
Project is not located entirely within the District and a potential boundary issue exists with the District.
B. Based on the capacity and capability of the District's existing and planned facilities, fire protection facilities are currently adequate or will be adequate to serve the proposed project. The expected emergency travel time to the proposed project is 4 minutes.
Fire protection facilities are not expected to be adequate to serve the proposed development within the next five years.
C. District conditions are attached. Number of sheets attached: See FP Report
District will submit conditions at a later date.

SECTION 3. FUELBREAK REQUIREMENTS

Note: The fuelbreak requirements prescribed by the fire district for the proposed project do not authorize any clearing prior to project approval by Planning & Development Services.

Within the proposed project 100 feet of clearing will be required around all structures.
The proposed project is located in a hazardous wildland fire area, and additional fuelbreak requirements may apply. Environmental mitigation requirements should be coordinated with the fire district to ensure that these requirements will not pose fire hazards.

This Project Facility Availability Form is valid until final discretionary action is taken pursuant to the application for the proposed project or until it is withdrawn, unless a shorter expiration date is otherwise noted.
Authorized Signature: Laina Kerette Deputy Fire Marshal 760 939-8115
Print Name and Title Phone Date: 21/11/2021
On completion of Section 2 and 3 by the District, applicant is to submit this form with application to: Planning & Development Services - Zoning Counter, 5510 Overland Ave, Suite 110, San Diego, CA 92123





County of San Diego, Planning & Development Services  
**PROJECT FACILITY AVAILABILITY - SCHOOL**  
**ZONING DIVISION**

*Please type or use pen*  
 (Two forms are needed if project is to be served by separate school districts)

Escondido Estates, LLC c/o Oscar Uranga (949) 933-4103  
 Owner's Name Phone

19782 MacArthur Boulevard, Suite 300  
 Owner's Mailing Address Street

Irvine CA 92612  
 City State Zip

ORG \_\_\_\_\_  
 ACCT \_\_\_\_\_  
 ACT \_\_\_\_\_  
 TASK \_\_\_\_\_  
 DATE \_\_\_\_\_

**Sc**

ELEMENTARY \_\_\_\_\_  
 HIGH SCHOOL \_\_\_\_\_  
 UNIFIED \_\_\_\_\_

*DISTRICT CASHIER'S USE ONLY*

**SECTION 1. PROJECT DESCRIPTION** **TO BE COMPLETED BY APPLICANT**

**A. LEGISLATIVE ACT**

Rezones changing Use Regulations or Development Regulations  
 General Plan Amendment  
 Specific Plan  
 Specific Plan Amendment

**B. DEVELOPMENT PROJECT**

Rezones changing Special Area or Neighborhood Regulations  
 Major Subdivision (TM)  
 Minor Subdivision (TPM)  
 Boundary Adjustment  
 Major Use Permit (MUP), purpose: \_\_\_\_\_  
 Time Extension... Case No. \_\_\_\_\_  
 Expired Map... Case No. \_\_\_\_\_  
 Other \_\_\_\_\_

**C.**  Residential . . . . . Total number of dwelling units 18  
 Commercial . . . . . Gross floor area \_\_\_\_\_  
 Industrial . . . . . Gross floor area \_\_\_\_\_  
 Other . . . . . Gross floor area \_\_\_\_\_

**D.**  Total Project acreage 10.28 Total number lots 18

Assessor's Parcel Number(s)  
 (Add extra if necessary)

234-231-01	

Thomas Guide Page \_\_\_\_\_ Grid \_\_\_\_\_  
 San Pasqual Valley Road & Idaho Avenue  
 Project address Street  
 North County Metropolitan 92027  
 Community Planning Area/Subregion Zip

Applicant's Signature: \_\_\_\_\_ Date: 4/27/2020  
 Address: 19782 MacArthur Boulevard, Suite 300, Irvine CA 92612 Phone: (949) 933-4103  
 (On completion of above, present to the district that provides school protection to complete Section 2 below.)

**SECTION 2: FACILITY AVAILABILITY** **TO BE COMPLETED BY DISTRICT**

ESCONDIDO UNION SCHOOL DISTRICT  
 District Name: \_\_\_\_\_

If not in a unified district, which elementary or high school district must also fill out a form?  
 ESCONDIDO UNION HIGH SCHOOL DISTRICT

Indicate the location and distance of proposed schools of attendance.

Elementary: LR GREEN miles: 2.5 approx  
 Junior/Middle: Bear Valley miles: 2.5 approx  
 High school: \_\_\_\_\_ miles: \_\_\_\_\_

This project will result in the overcrowding of the  elementary  junior/school  high school. (Check)  
 Fees will be levied or land will be dedicated in accordance with Education Code Section 17620 prior to the issuance of building permits.  
 Project is located entirely within the district and is eligible for service.  
 The project is not located entirely within the district and a potential boundary issue may exist with the \_\_\_\_\_ school district.

Cindy Kroon \_\_\_\_\_ April 29, 2020  
 Authorized Signature Print Name

FACILITIES \_\_\_\_\_ 760-432-2195  
 Print Title Phone

On completion of Section 2 by the district, applicant is to submit this form with application to:  
 Planning & Development Services, Zoning Counter, 5510 Overland Ave. Suite 110 San Diego, CA 92123



County of San Diego, Planning & Development Services  
**PROJECT FACILITY AVAILABILITY - SCHOOL ZONING DIVISION**

*Please type or use pen*  
 (Two forms are needed if project is to be served by separate school districts)

Escondido Estates, LLC c/o Oscar Uranga (949) 933-4103

Owner's Name \_\_\_\_\_ Phone \_\_\_\_\_

19782 MacArthur Boulevard, Suite 300

Owner's Mailing Address \_\_\_\_\_ Street \_\_\_\_\_

Irvine CA 92612

City State Zip

ORG \_\_\_\_\_

ACCT \_\_\_\_\_

ACT \_\_\_\_\_

TASK \_\_\_\_\_

DATE \_\_\_\_\_

ELEMENTARY \_\_\_\_\_

HIGH SCHOOL \_\_\_\_\_

UNIFIED \_\_\_\_\_

**Sc**

*DISTRICT CASHIER'S USE ONLY*

**SECTION 1. PROJECT DESCRIPTION TO BE COMPLETED BY APPLICANT**

**A. LEGISLATIVE ACT**

Rezones changing Use Regulations or Development Regulations

General Plan Amendment

Specific Plan

Specific Plan Amendment

**B. DEVELOPMENT PROJECT**

Rezones changing Special Area or Neighborhood Regulations

Major Subdivision (TM)

Minor Subdivision (TPM)

Boundary Adjustment

Major Use Permit (MUP), purpose: \_\_\_\_\_

Time Extension...Case No. \_\_\_\_\_

Expired Map...Case No. \_\_\_\_\_

Other \_\_\_\_\_

**C.**  Residential . . . . . Total number of dwelling units 18

Commercial . . . . . Gross floor area \_\_\_\_\_

Industrial . . . . . Gross floor area \_\_\_\_\_

Other . . . . . Gross floor area \_\_\_\_\_

**D.**  Total Project acreage 10.28 Total number lots 18

Assessor's Parcel Number(s)  
 (Add extra if necessary)

234-231-01	

Thomas Guide Page \_\_\_\_\_ Grid \_\_\_\_\_

San Pasqual Valley Road & Idaho Avenue

Project address \_\_\_\_\_ Street \_\_\_\_\_

North County Metropolitan 92027

Community Planning Area/Subregion Zip

Applicant's Signature: \_\_\_\_\_ Date: 4/27/2020

Address: 19782 MacArthur Boulevard, Suite 300, Irvine CA 92612 Phone: (949) 933-4103

(On completion of above, present to the district that provides school protection to complete Section 2 below.)

**SECTION 2: FACILITY AVAILABILITY TO BE COMPLETED BY DISTRICT**

If not in a unified district, which elementary or high school district must also fill out a form?

District Name: Escondido Union High School District

Indicate the location and distance of proposed schools of attendance.

Elementary: \_\_\_\_\_ miles: \_\_\_\_\_

Junior/Middle: \_\_\_\_\_ miles: \_\_\_\_\_

High school: Orange Glen High School miles: 1.7

This project will result in the overcrowding of the  elementary  junior/school  high school. (**Check**)

Fees will be levied or land will be dedicated in accordance with Education Code Section 17620 prior to the issuance of building permits.

Project is located entirely within the district and is eligible for service.

The project is not located entirely within the district and a potential boundary issue may exist with the \_\_\_\_\_ school district.

\_\_\_\_\_  
 Authorized Signature Amanda Phillips  
 Print Name

Assistant Superintendent, Business Services (760) 291-3210  
 Print Title Phone

On completion of Section 2 by the district, applicant is to submit this form with application to:  
 Planning & Development Services, Zoning Counter, 5510 Overland Ave. Suite 110 San Diego, CA 92123

**SDC PDS RCVD 05-14-20**





County of San Diego, Planning & Development Services
PROJECT FACILITY AVAILABILITY - WATER
ZONING DIVISION

Please type or use pen
Escondido Estates, LLC (949) 933-4103
Owner's Name Phone
19782 MacArthur Blvd, Suite 300
Owner's Mailing Address Street
Irvine CA 92612
City State Zip
ORG \_\_\_\_\_
ACCT \_\_\_\_\_
ACT \_\_\_\_\_
TASK \_\_\_\_\_
DATE \_\_\_\_\_ AMT \$ \_\_\_\_\_
DISTRICT CASHIER'S USE ONLY

W

SECTION 1. PROJECT DESCRIPTION TO BE COMPLETED BY APPLICANT

A. [X] Major Subdivision (TM) [ ] Specific Plan or Specific Plan Amendment
[ ] Minor Subdivision (TPM) [ ] Certificate of Compliance:
[ ] Boundary Adjustment
[ ] Rezone (Reclassification) from \_\_\_\_\_ to \_\_\_\_\_ zone.
[ ] Major Use Permit (MUP), purpose: \_\_\_\_\_
[ ] Time Extension... Case No. \_\_\_\_\_
[ ] Expired Map... Case No. \_\_\_\_\_
[ ] Other \_\_\_\_\_
Assessor's Parcel Number(s) (Add extra if necessary)
234-231-01
B. [X] Residential . . . . . Total number of dwelling units 20
[ ] Commercial . . . . . Gross floor area \_\_\_\_\_
[ ] Industrial . . . . . Gross floor area \_\_\_\_\_
[ ] Other . . . . . Gross floor area \_\_\_\_\_
C. [X] Total Project acreage 10.28 Total number of lots 20
D. Is the project proposing the use of groundwater? [X] Yes [ ] No
Is the project proposing the use of reclaimed water? [ ] Yes [X] No
Thomas Guide Page \_\_\_\_\_ Grid \_\_\_\_\_
San Pasqual Valley Road. & Idaho Ave.
Project address Street
North County Metropolitan 92027
Community Planning Area/Subregion Zip

Owner/Applicant agrees to pay all necessary construction costs, dedicate all district required easements to extend service to the project and COMPLETE ALL CONDITIONS REQUIRED BY THE DISTRICT.

Applicant's Signature: \_\_\_\_\_ Date: 11/10/20
Address: 19782 MacArthur Blvd, Suite 300, Irvine, CA 92612 Phone: (949) 933-4103

(On completion of above, present to the district that provides water protection to complete Section 2 below.)

SECTION 2: FACILITY AVAILABILITY TO BE COMPLETED BY DISTRICT

District Name: City of Escondido Service area: All-Lindley
A. [X] Project is in the district.
[ ] Project is not in the district but is within its Sphere of Influence boundary, owner must apply for annexation.
[ ] Project is not in the district and is not within its Sphere of Influence boundary.
[ ] The project is not located entirely within the district and a potential boundary issue exists with the \_\_\_\_\_ District.
B. [ ] Facilities to serve the project [ ] ARE [ ] ARE NOT reasonably expected to be available within the next 5 years based on the capital facility plans of the district. Explain in space below or on attached \_\_\_\_\_ (Number of sheets)
[ ] Project will not be served for the following reason(s): \_\_\_\_\_
C. [X] District conditions are attached. Number of sheets attached: 2
[ ] District has specific water reclamation conditions which are attached. Number of sheets attached: \_\_\_\_\_
[ ] District will submit conditions at a later date.
D. [ ] How far will the pipeline(s) have to be extended to serve the project? \_\_\_\_\_

This Project Facility Availability Form is valid until final discretionary action is taken pursuant to the application for the proposed project or until it is withdrawn, unless a shorter expiration date is otherwise noted.

Authorized Signature: Laurie Gordon Print Name: Laurie Gordon
Print Title: Engineer II Phone: 760-839-6290 x7040 Date: Dec 17, 2020

NOTE: THIS DOCUMENT IS NOT A COMMITMENT OF SERVICE OR FACILITIES BY THE DISTRICT
On completion of Section 2 and 3 by the District, applicant is to submit this form with application to:
Planning & Development Services - Zoning Counter, 5510 Overland Ave, Suite 110, San Diego, CA 92123





Laurie Gordon  
Utilities Engineer II  
Construction and Engineering  
lgordon@escondido.org  
Phone: 760-839-6290 x 7040 Fax: 760-738-5168

Dec 17, 2020

Escondido Estates, LLC  
ATTN: Oscar Uranga  
19782 MacArthur Boulevard, Suite 300  
Irvine, CA 92612

Subject: Water Service Availability for San Diego County – 1125 Idaho Avenue (APN 234-231-0100)

Dear Sir or Madam:

The City of Escondido received the attached Water Availability Form for APN 234-231-01. The project is located within the County of San Diego near the intersection of San Pasqual Valley Road and Idaho Avenue and consists of a proposal to construct a residential major subdivision with 20 total lots. The site falls within the City of Escondido's water service area and is eligible for water service. The following conditions of approval must be satisfied prior to obtaining water service from the City of Escondido.

1. Per the attached Water Study prepared by Dexter Wilson dated December 3, 2020, adequate upsizing and replacement of all water infrastructure shall be required to provide adequate water service and/or fire protection for the proposed development. Construction of the water mains shall be in accordance with the Standards and Specifications of the City of Escondido. Please submit to the City of Escondido water line plans for the following:
  - a) An extension of a 12-inch water line in Idaho Avenue to the project site shall be constructed to the satisfaction of the Utilities Engineer. On-site water mains shall be a minimum of 8-inches and shall be constructed to the satisfaction of the Utility Engineer. Plans for the proposed water system shall be submitted to the City of Escondido for review and approval.
  - b) All improvements to the existing public potable water system shall be designed and constructed per the City of Escondido Design Standards and Standard Drawings.
  - c) Minimum 1" water meters and backflow prevention devices shall be required to each lot.

December 17, 2020  
Water Service availability 1125 Idaho Avenue  
Page 2

- d) If the Fire Department requires fire hydrants, the fire hydrants shall be installed at a location approved by the Fire Marshal. Fire hydrants shall be public and connected to a minimum 8" public water main.
  
- 2. A Public Utility Easement shall be granted to the City of Escondido for any proposed public waterlines and/or public water appurtenances on private property. The easement shall include all fire hydrants, water meters and other appurtenances. The minimum easement width shall be 20 feet, or the full width of the private easement road, whichever is greater.

If you have any additional questions, please feel free to contact me at (760) 839-6290 x 7035.

Sincerely,



Laurie Gordon  
Engineer II

Enclosure: Water System Analysis for the Escondido Estates Project APN 234-231-01 prepared by Dexter Wilson dated December 3, 2020.



**Attachment H – Ownership Disclosure**



County of San Diego, Planning & Development Services
APPLICANT'S DISCLOSURE OF OWNERSHIP INTERESTS ON APPLICATION FOR ZONING PERMITS/ APPROVALS
ZONING DIVISION

Record ID(s) PDS 2019-MPA-19-004

Assessor's Parcel Number(s) 234-231-01

Ordinance No. 4544 (N.S.) requires that the following information must be disclosed at the time of filing of this discretionary permit. The application shall be signed by all owners of the property subject to the application or the authorized agent(s) of the owner(s), pursuant to Section 7017 of the Zoning Ordinance. NOTE: Attach additional pages if necessary.

A. List the names of all persons having any ownership interest in the property involved.

Escondido Estates, LLC
[Blank lines for additional names]

B. If any person identified pursuant to (A) above is a corporation or partnership, list the names of all individuals owning more than 10% of the shares in the corporation or owning any partnership interest in the partnership.

Oscar Uranga
Keegan McNamara
[Blank lines for additional names]

C. If any person identified pursuant to (A) above is a non-profit organization or a trust, list the names of any persons serving as director of the non-profit organization or as trustee or beneficiary or trustor of the trust.

[Blank lines for names]

NOTE: Section 1127 of The Zoning Ordinance defines Person as: "Any individual, firm, copartnership, joint venture, association, social club, fraternal organization, corporation, estate, trust, receiver syndicate, this and any other county, city and county, city, municipality, district or other political subdivision, or any other group or combination acting as a unit."

[Signature]
Signature of Applicant
Keegan McNamara
Print Name
05/07/2020
Date

OFFICIAL USE ONLY
SDC PDS RCVD 05-14-20
TM5639

5510 OVERLAND AVE, SUITE 110, SAN DIEGO, CA 92123 • (858) 565-5981 • (888) 267-8770

http://www.sdcounty.ca.gov/pds

