

Attachment F

Exhibit-1

CEQA Findings

**COUNTY OF SAN DIEGO PROPERTY SPECIFIC REQUESTS GENERAL PLAN
AMENDMENT AND REZONE
EIR # PDS2012-ER-12-00-003
STATE CLEARINGHOUSE NUMBER 2015121012**

**ATTACHMENT F
EXHIBIT-1**

STAFF RECOMMENDED PROJECT

JUNE 2018

CEQA FINDINGS

- a. Certify that the SEIR dated June 2018 on file with Planning & Development Services as EIR # PDS2012-ER-12-00-003 has been completed in compliance with the CEQA and the State CEQA Guidelines, that the SEIR was presented to the Board of Supervisors and that the Board of Supervisors reviewed and considered the information contained therein before approving the project, and that the SEIR reflects the independent judgment and analysis of the Board of Supervisors.
- b. Adopt the findings concerning mitigation of significant environmental effects pursuant to CEQA Guidelines Section 15091 (Sections II, III, and V below).
- c. Adopt the Statement of Overriding Considerations pursuant to State CEQA Guidelines Section 15093 (Section IX below).
- d. Adopt the Decision and Explanation Regarding Recirculation of the Draft Environmental Impact Report pursuant to State CEQA Guidelines Section 15088.5(e) (Section VII below).
- e. Adopt the Mitigation Monitoring and Reporting Program pursuant to CEQA Guidelines Section 15091(d) (Attachment F, Exhibit 2).

**FINDINGS PURSUANT TO STATE CEQA GUIDELINES SECTIONS 15088.5, 15090, 15091
AND 15093**

**COUNTY OF SAN DIEGO PROPERTY SPECIFIC REQUESTS GENERAL PLAN
AMENDMENT AND REZONE**

JUNE 2018

ATTACHMENT F

EXHIBIT-1

STAFF RECOMMENDED PROJECT

**CEQA FINDINGS REGARDING SIGNIFICANT EFFECTS FOR THE
COUNTY OF SAN DIEGO PROPERTY SPECIFIC REQUESTS GENERAL PLAN
AMENDMENT AND REZONE
SCH #2015121012**

I. INTRODUCTION

The following Findings are made for the County of San Diego Property Specific Requests (PSR) General Plan Amendment and Rezone, and more specifically, for the Staff Recommended Project, which is recommended for approval by staff based on consideration of the alternatives, project objectives, project benefits, General Plan and community plan policy consistency issues, environmental impacts, availability of infrastructure and services, stakeholder input, and numerous other factors. The Staff Recommended Project is composed of an associated General Plan Amendment (GPA) to the County's General Plan Update (GPU), and changes to the zoning ordinance designations for the Proposed Project areas.

The Staff Recommended Project consists of a combination of the Proposed Project and the Project Alternatives as identified below:

- The Proposed Project Map for PSR Analysis Areas FB19+, ME26, NC3A, SD15 and the Western Champagne Gardens Analysis Area (includes Champagne Gardens Subareas 1, 6, 7 and 8; note: the Proposed Project Map is the same as the Reduced Density Alternative Map for Western Champagne Gardens)
- The Reduced Density Alternative Map for PSR Analysis Areas BO18+, CD14, FB2+, FB17, ME30A, NC18A, NC37, NC38+, PP30, VC7+, VC51, VC57+, and the Eastern Champagne Garden Analysis Area (includes Champagne Gardens Subareas 2, 3, 4, and 5); and
- The No Project Alternative for PSR Analysis Areas DS8, DS24, FB21+, NC22, and VC67.

The environmental impacts of the Recommended Project are addressed in a Subsequent Program Environmental Impact Report (SPEIR) dated June 2018, which is incorporated by reference herein.

The Final SEIR prepared for the Staff Recommended Project consists of three components:

- A) Final SEIR evaluating the Proposed Project and a reasonable range of alternatives
- B) Summary of Changes to the Draft Final SEIR, Comment Letters and Responses to comments on the Draft Final SEIR
- C) Technical Appendices to the Final SEIR

The Final SEIR evaluated potentially significant effects for the following environmental areas of potential concern: 1) Aesthetics; 2) Agricultural and Forestry Resources; 3) Air Quality; 4) Biological Resources; 5) Cultural and Paleontological Resources; 6) Geology and Soils; 7) Hazards and Hazardous Materials; 8) Hydrology and Water Quality; 9) Land Use; 10) Mineral

Resources 11) Noise; 12) Population and Housing; 13) Public Services; 14) Recreation; 15) Transportation and Traffic; 16) Utilities and Service Systems; and 17) Global Climate Change.

The Final SEIR functions as a supplement to the 2011 GPU Program Environmental Report (PEIR), and as such the analysis throughout relies upon pertinent information that is provided in the 2011 GPU PEIR and was adopted with the 2011 GPU. The analysis relied upon the adopted 2011 GPU policies and 2011 GPU PEIR mitigation measures and applied those policies and mitigation measures to the project prior to rendering an impact conclusion. Where impacts were concluded to remain significant after application of all relevant policies and mitigation measures of the 2011 GPU, additional mitigation was considered and recommended in the Final SEIR. The Findings discussed below address the significant impacts of the project after application of relevant 2011 GPU policies and 2011 GPU PEIR mitigation measures. Where 2011 GPU PEIR mitigation measures were applied to the Staff Recommended Project, those mitigation measures are referenced in the Mitigation Monitoring and Reporting Program for the Staff Recommended Project.

The County Board of Supervisors concurs with the conclusions in the Final SEIR that implementation of the project will not result in potentially significant impacts on Cultural Resources, Geology and Soils, and Global Climate Change. Moreover, the remaining environmental issues evaluated will include impacts that are significant and unavoidable. For the 14 environmental subject areas in which environmental impacts will remain significant and unavoidable, even with the implementation of mitigation measures, overriding considerations exist that make the impacts acceptable (Section III, below).

The California Environmental Quality Act (CEQA) (California Public Resources Code §21000 *et. seq.* and the State CEQA Guidelines (Title 14, California Code of Regulations, §15000 *et. seq.*) require that no public agency shall approve or carry out a project which identifies one or more significant environmental effects of a project unless the public agency makes one or more written findings for each of those significant effects, accompanied by a brief explanation of the rationale and facts supporting each finding.

The possible findings are:

- (1) Changes or alterations have been required in, or incorporated into, the project that mitigate or avoid the significant environmental effects on the environment;
- (2) Those changes or alterations are within the responsibility and jurisdiction of another public agency and have been or can or should be adopted by that other agency; or
- (3) Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the EIR (CEQA, §21081(a); Guidelines, §15091(a)).

For each significant effect identified for the Property Specific Requests General Plan Amendment and Rezone, one of the above three findings applies. Therefore, the discussion of significant impacts, and mitigation measures where possible, are organized below by finding rather than by environmental subject area.

In analyzing potential impacts, the Final SEIR noted that in order to realize additional residential density or development intensity (commercial or industrial changes) under the Proposed Project,

properties would require further discretionary permits from the County, such as Subdivision Maps, Site Plans, and Grading Permits, triggering additional review under CEQA. Under these circumstances, projects will be reviewed under CEQA and 2011 GPU policies, and applicable mitigation measures from the Final SEIR will be incorporated by future discretionary projects.

However, the Final SEIR also acknowledged there may be circumstances where further discretionary permits are not required, and no additional CEQA review would occur. In addition, even with implementation of applicable policies and mitigation measures, the locations and details of future development projects are currently unknown and it cannot be determined with certainty that impacts would be reduced to a less-than-significant level because of many influencing variables such as location, size, design, and technology. The Final SEIR concluded there would be no other mechanisms available to review potential significant environmental impacts and impose or implement feasible mitigation measures. Therefore, the Proposed Project may have significant and unmitigated environmental impacts related to aesthetics, agriculture and forestry resources, air quality, biological resources, hazards and hazardous materials, hydrology and water quality, land use, mineral resources, noise, population and housing, public services, transportation and traffic, and utilities and service systems. Details of these conclusions are provided in the findings below. A Statement of Overriding Considerations is being adopted to address these significant and unmitigated impacts.

II. POTENTIALLY SIGNIFICANT EFFECTS WHERE MITIGATION IS AVAILABLE TO REDUCE IMPACTS TO LESS THAN SIGNIFICANT (CEQA GUIDELINES SECTION 15091(A)(1))

Pursuant to Section 21081(A) of the Public Resources Code and Section 15091(A)(1) of the State CEQA Guidelines, the County of San Diego Board of Supervisors finds that, for each of the following significant effects identified in the Final SEIR, changes or alternatives have been required in, or incorporated into, the Staff Recommended Project that mitigate or avoid the potentially significant effects on the environment. The potentially significant effects and mitigation measures are stated fully in the Final SEIR. These findings are explained below and are supported by substantial evidence in the record of proceedings.

To the extent these findings conclude that mitigation measures identified in the Final SEIR are feasible, the County hereby binds itself to implement those measures. These findings are not merely informational, but constitute a binding set of obligations upon the County and responsible agencies that take effect upon the County's adoption of the resolutions certifying the Final SEIR and approving the Staff Recommended Project.

In adopting these findings, the County concurrently adopts a Mitigation, Monitoring and Reporting Program (MMRP) pursuant to Public Resources Code Section 21081.6. The MMRP is designed to ensure the Staff Recommended Project complies with the feasible mitigation measures identified below during implementation of the Project and is incorporated herein by this reference.

A. Aesthetics

- 1. Significant Effect: Scenic Vistas.** Future projects implemented under the project would have the potential to result in the obstruction, interruption, or detracting of scenic vistas (Impact AE-1). Therefore, impacts would be potentially significant. Additionally, the project

would result in a potentially significant cumulative impact in combination with other projects in the region (Impact AE-5).

Finding: Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect as identified in the Final SEIR.

Mitigation Measures: No feasible mitigation beyond existing federal and state permitting requirements and compliance with the County's adopted 2011 GPU policies or 2011 GPU PEIR mitigation measures is available and could be applied to individual actions under the project.

Facts in Supporting Findings: The policies applicable to scenic vistas that were adopted as part of the 2011 GPU and are applicable to the project are Policies COS-11.1, COS-11.2, COS-11.3, COS-11.4, COS-11.5, COS-11.6, COS-11.7, LU-6.3, LU-6.4, LU-6.6, LU-6.7, LU-6.9, LU-10.1, LU-10.2, and M-2.3. The mitigation measures applicable to scenic vistas that were adopted as a part of the 2011 GPU PEIR and are applicable to the project are Aes-1.1, Aes-1.2, Aes-1.3, Aes-1.4, Aes-1.5, Aes-1.6, Aes-1.7, Aes-1.8, Aes-1.9, Aes-1.10, and Aes-1.11.

Implementation of the adopted General Plan policies and 2011 PEIR mitigation measures, would mitigate direct Impact AE-1 and cumulative Impact AE-5 to scenic vistas to a level below significant.

- 2. Significant Effect: Scenic Resources.** Implementation of the project would allow development to occur that would have the potential to impact scenic vistas through the removal or substantial adverse change of features that contribute to the valued visual character or image of a neighborhood, community, State Scenic Highway, or localized area. Therefore, the project would result in a potentially significant impact on scenic resources (Impact AE-2). Additionally, the project would result in a potentially significant cumulative impact in combination with other projects in the region (Impact AE-6).

Finding: Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect as identified in the Final SEIR.

Mitigation Measures: No feasible mitigation beyond existing federal and state permitting requirements and compliance with the County's adopted 2011 GPU policies or 2011 GPU PEIR mitigation measures is available and could be applied to individual actions under the project.

Facts in Supporting Findings: The policies applicable to scenic resources that were adopted as part of the 2011 GPU and are applicable to the project are Policies COS-11.1, COS-11.2, COS-11.3, COS-11.4, COS-11.5, COS-11.6, COS-11.7, LU-6.3, LU-6.4, LU-6.6, LU-6.7, LU-6.9, LU-10.1, LU-10.2, and M-2.3. The mitigation measures applicable to scenic vistas that were adopted as a part of the 2011 GPU PEIR and are applicable to the project are Aes-1.1, Aes-1.2, Aes-1.3, Aes-1.4, Aes-1.5, Aes-1.6, Aes-1.7, Aes-1.8, Aes-1.9, and Aes-1.10.

Implementation of adopted General Plan policies and 2011 PEIR mitigation measures, would mitigate project-related direct Impact AE-2 and cumulative Impact AE-6 on scenic resources to a level below significant.

B. Agricultural and Forestry Resources

- 1. Significant Effect: Direct and Indirect Loss or Conversion of Forestry Resources.** Implementation of the project would result in additional density in areas containing forest land and timberland resources and would potentially cause direct and indirect loss or conversion of forest land, which is considered potentially significant (Impact AG-3). The project was also determined to contribute to a cumulative direct and indirect impact related to conversion or loss of forest land (Impact AG-6).

Finding: Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect as identified in the Final SEIR.

Mitigation Measures: No feasible mitigation beyond existing federal and state permitting requirements and compliance with the County's adopted 2011 GPU policies or 2011 GPU PEIR mitigation measures is available and could be applied to individual actions under the project.

Facts in Supporting Findings: The policies applicable to direct and indirect loss or conversion of forestry resources that were adopted as part of the 2011 GPU and are applicable to the project are Policies COS-2.1, COS-2.2, COS-3.1, COS-5.3, COS-6.1, COS-6.4, COS-6.6, and LU-10.2. The mitigation measures applicable to direct and indirect loss or conversion of forestry resources that were adopted as a part of the 2011 GPU PEIR and are applicable to the project are Bio-1.1, Bio-1.3, Bio-1.5, Bio-1.6, and Bio-1.7.

Implementation of the adopted General Plan policies and 2011 PEIR mitigation measures would mitigate direct and cumulative impacts related to direct and indirect loss or conversion of forest land to a level below significant.

C. Biological Resources

- 1. Significant Effect: Federally Protected Wetlands.** Implementation of the project would have the potential to result in a potentially significant direct impact on federally protected wetlands (Impact BI-3).

Finding: Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect as identified in the Final SEIR.

Mitigation Measures: No feasible mitigation beyond existing federal and state permitting requirements and compliance with the County's adopted 2011 GPU policies or 2011 GPU PEIR mitigation measures is available and could be applied to individual actions under the project.

Facts in Supporting Findings: The policies applicable to federally protected wetlands that were adopted as part of the 2011 GPU and are applicable to the project are Policies COS-3.1 and COS-3.2. The mitigation measures applicable to federally protected wetlands that were adopted as a part of the 2011 GPU PEIR and are applicable to the project are Bio-1.1, Bio-1.5, Bio-1.6, Bio-1.7, Bio-2.2, Bio-2.3, and Bio-2.4.

Implementation of the adopted General Plan policies and 2011 PEIR mitigation measures would mitigate impacts related to federally protected wetlands to a level below significant.

D. Cultural Resources

- 1. Significant Effect: Historical Resources.** Implementation of the project would facilitate new development that, in turn, could have the potential to result in substantial adverse changes to the significance of unknown historical resources (Impact CR-1). Additionally, the project would result in a potentially significant cumulative impact prior to mitigation (Impact CR-6).

Finding: Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect as identified in the Final SEIR.

Mitigation Measures: No feasible mitigation beyond existing federal and state permitting requirements and compliance with the County's adopted 2011 GPU policies or 2011 GPU PEIR mitigation measures is available and could be applied to individual actions under the project.

Facts in Supporting Findings: The policy applicable to historical resources that were adopted as part of the 2011 GPU and are applicable to the project is Policy COS-8.1. The mitigation measures applicable to historical resources that were adopted as a part of the 2011 GPU PEIR and are applicable to the project are Cul-1.1, Cul-1.2, Cul-1.3, Cul-1.4, Cul-1.5, Cul-1.6, and Cul-1.7, and Cul-1.8.

Implementation of the adopted General Plan policies and 2011 PEIR mitigation measures would mitigate potentially significant direct and cumulative impacts related to historical resources to a level below significant.

- 2. Significant Effect: Archaeological Resources.** Implementation of the project would result in new development that would have the potential to cause a substantial adverse change in the significance of an archaeological resource, including the destruction or disturbance of an archaeological site that contains or has the potential to contain information important to history or prehistory. Therefore, the project would result in a potentially significant impact on archaeological resources (Impact CR-2). Additionally, the project would result in a potentially significant cumulative impact prior to mitigation (Impact CR-7).

Finding: Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect as identified in the Final SEIR.

Mitigation Measures: No feasible mitigation beyond existing federal and state permitting requirements and compliance with the County's adopted 2011 GPU policies or 2011 GPU PEIR mitigation measures is available and could be applied to individual actions under the project.

Facts in Supporting Findings: The policies applicable to archeological resources that were adopted as part of the 2011 GPU and are applicable to the project are Policies COS-7.1, COS-7.2, COS-7.3, and COS-7.4. The mitigation measures applicable to archeological resources that were adopted as a part of the 2011 GPU PEIR and are applicable to the project are Cul-2.1, Cul-2.2, Cul-2.3, Cul-2.4, Cul-2.5, and Cul-2.6.

Implementation of the adopted General Plan policies and 2011 PEIR mitigation measures would mitigate potentially significant direct and cumulative impacts related to archeological resources to a level below significant.

- 3. Significant Effect: Paleontological Resources.** Implementation of the project would result in new development that would have the potential to adversely impact unique paleontological resources. Therefore, the project would result in a potentially significant impact on paleontological resources (Impact CR-3). Additionally, the project would result in a potentially significant cumulative impact prior to mitigation (Impact CR-8).

Finding: Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect as identified in the Final SEIR.

Mitigation Measures: No feasible mitigation beyond existing federal and state permitting requirements and compliance with the County's adopted 2011 GPU policies or 2011 GPU PEIR mitigation measures is available and could be applied to individual actions under the project.

Facts in Supporting Findings: The policy applicable to paleontological resources that was adopted as part of the 2011 GPU and is applicable to the project is Policy COS-9.1. The mitigation measures applicable to paleontological resources that were adopted as a part of the 2011 GPU PEIR and are applicable to the project are Cul-3.1 and Cul-3.2.

Implementation of the adopted General Plan policy and 2011 PEIR mitigation measures would mitigate potentially significant direct and cumulative impacts related to paleontological resources to a level below significant.

- 4. Significant Effect: Human Remains.** Implementation of the project would result in new development that would have the potential to disturb human remains, including those discovered outside of formal cemeteries. Therefore, the project would result in a potentially significant impact associated with human remains (Impact CR-4). Additionally, the project would result in a potentially significant cumulative impact prior to mitigation (Impact CR-9).

Finding: Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect as identified in the Final SEIR.

Mitigation Measure: No feasible mitigation beyond existing federal and state permitting requirements and compliance with the County's adopted 2011 GPU policies or 2011 GPU PEIR mitigation measures is available and could be applied to individual actions under the project.

Facts in Supporting Findings: The policy applicable to human remains that was adopted as part of the 2011 GPU and is applicable to the project is Policy COS-7.5. The mitigation measure applicable to human remains adopted as a part of the 2011 GPU PEIR and applicable to the project is Cul-4.1.

Implementation of the adopted General Plan policy and 2011 PEIR mitigation measure would mitigate potentially significant direct and cumulative impacts related to human remains to a level below significant.

- 5. Significant Effect: Tribal Cultural Resources.** Implementation of the project would result in new development that would have the potential to disturb unknown tribal cultural resources (Impact CR-5). Additionally, the project would result in a potentially significant cumulative impact prior to mitigation (Impact CR-10).

Finding: Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect as identified in the Final SEIR.

Mitigation Measures: Mitigation measures M-Cul-5.1 through M-Cul-5.4 were identified through analysis of potential impacts to Tribal Cultural Resources in Section 2.5.5.5 of the SEIR.

Facts in Supporting Findings: Mitigation measures M-Cul-5.1, M-Cul-5.2, M-Cul-5.3, and M-Cul-5.4 would result in the identification, avoidance, or mitigation of any impacts to Tribal Cultural Resources through PDS staff coordinating with agencies, tribes, institutions and project consultants on all discretionary projects as applicable.

Implementation of the mitigation measures above would mitigate potentially significant direct and cumulative impacts related to tribal cultural resources to a level below significant.

E. Hazards and Hazardous Materials

- 1. Significant Effect: Emergency Response and Evacuation Plans.** Implementation of the project would result in potential increases in development in areas of the County that did not account for the proposed growth in their existing emergency response and evacuation plans. This is considered to be a potentially significant impact (Impact HZ-1).

Finding: Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect as identified in the Final SEIR.

Mitigation Measures: No feasible mitigation beyond existing federal and state permitting requirements and compliance with the County's adopted 2011 GPU policies or 2011 GPU PEIR mitigation measures is available and could be applied to individual actions under the project.

Facts in Supporting Findings: The policies applicable to emergency response and evacuation plans that were adopted as part of the 2011 GPU and are applicable to the project are Policies M-1.2, M-3.3, M-4.3, and S-1.3. The mitigation measures applicable to emergency response and evacuation plans that were adopted as a part of the 2011 GPU PEIR and are applicable to the project are Haz-3.1, Haz-3.2, and Haz-3.3.

Implementation of the adopted General Plan policies and 2011 PEIR mitigation measures would mitigate potentially significant impacts related to emergency response and evacuation plans to a level below significant.

F. Hydrology and Water Quality

- 1. Significant Effect: Erosion or Siltation.** The project would increase runoff that has the potential to cause new erosion or worsen existing erosion problems, resulting in a potentially significant direct impact (Impact HY-3). Additionally, the project would result in a potentially significant cumulative impact associated with erosion or siltation (Impact HY-12).

Finding: Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect as identified in the Final SEIR.

Mitigation Measures: No feasible mitigation beyond existing federal and state permitting requirements and compliance with the County's adopted 2011 GPU policies or 2011 GPU PEIR mitigation measures is available and could be applied to individual actions under the project.

Facts in Supporting Findings: The policies applicable to erosion and siltation that were adopted as part of the 2011 GPU and are applicable to the project are Policies COS-5.3, LU-6.5, and LU-6.9. The mitigation measures applicable to erosion and siltation that were adopted as a part of the 2011 GPU PEIR and are applicable to the project are Hyd-1.2, Hyd-1.3, Hyd-1.5, Hyd-3.1, Hyd-3.2, and Hyd-3.3.

Implementation of the adopted General Plan policies and 2011 PEIR mitigation measures would mitigate potentially significant direct and cumulative impacts related to erosion and siltation to a level below significant.

- 2. Significant Effect: Flooding.** The project would convert permeable surfaces to impermeable surfaces, possibly creating flooding on or off site, resulting in a potentially significant impact (Impact HY-4).

Finding: Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect as identified in the Final SEIR.

Mitigation Measures: No feasible mitigation beyond existing federal and state permitting requirements and compliance with the County's adopted 2011 GPU policies or 2011 GPU PEIR mitigation measures is available and could be applied to individual actions under the project.

Facts in Supporting Findings: The policies applicable to flooding that were adopted as part of the 2011 GPU and are applicable to the project are Policies LU-6.5, LU-6.10, S-9.2, S-10.2, S-10.3, S-10.4, and S-10.6. The mitigation measures applicable to flooding that were adopted as a part of the 2011 GPU PEIR and are applicable to the project are Hyd-1.1, Hyd-1.2, Hyd-1.3, Hyd-1.4, Hyd-1.5, Hyd-2.5, Hyd-4.1, Hyd-4.2, and Hyd-4.3.

Implementation of the adopted General Plan policies and 2011 PEIR mitigation measures would mitigate potentially significant impacts related to flooding to a level below significant.

3. **Significant Effect: Exceed Capacity of Stormwater Systems.** The project could exceed the capacity of existing stormwater drainage facilities, resulting in a potentially significant direct impact (Impact HY-5).

Finding: Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect as identified in the Final SEIR.

Mitigation Measures: No feasible mitigation beyond existing federal and state permitting requirements and compliance with the County's adopted 2011 GPU policies or 2011 GPU PEIR mitigation measures is available and could be applied to individual actions under the project.

Facts in Supporting Findings: The policies applicable to exceeding the capacity of stormwater systems that were adopted as part of the 2011 GPU and are applicable to the project are Policies COS-4.2, COS-4.3, COS-4.4, COS-5.2, COS-5.3, COS-5.5, LU-6.5, LU-6.9, LU-6.10, LU-14.1, LU-14.2, LU-14.3, LU-14.4, S-9.2, S-10.2, S-10.3, S-10.4, S-10.5, and S-10.6. The mitigation measures applicable to exceeding the capacity of stormwater systems that were adopted as a part of the 2011 GPU PEIR and are applicable to the project are Hyd-1.1, Hyd-1.2, Hyd-1.3, Hyd-1.4, Hyd-1.5, Hyd-2.5, Hyd-3.1, Hyd-4.1, Hyd-4.2, and Hyd-4.3.

Implementation of the adopted General Plan policies and 2011 PEIR mitigation measures would mitigate potentially significant impacts related to exceeding the capacity of stormwater systems to a level below significant.

4. **Significant Effect: Housing within a 100-year Flood Hazard Area.** The project would include land designated for residential use within a 100-year flood hazard area, resulting in a potentially significant direct impact (Impact HY-6).

Finding: Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect as identified in the Final SEIR.

Mitigation Measures: No feasible mitigation beyond existing federal and state permitting requirements and compliance with the County's adopted 2011 GPU policies or 2011 GPU PEIR mitigation measures is available and could be applied to individual actions under the project.

Facts in Supporting Findings: The policies applicable to housing within a 100-year flood hazard area that were adopted as part of the 2011 GPU and are applicable to the project are Policies COS-5.1, LU-6.12, S-9.1, S-9.2, S-9.3, S-9.4, S-9.5, and S-10.1. The mitigation measures applicable to housing within a 100-year flood hazard area that were adopted as a part of the 2011 GPU PEIR and are applicable to the project are Hyd-1.2, Hyd-1.5, Hyd-2.5, Hyd-4.1, Hyd-4.2, and Hyd-6.1.

Implementation of the adopted General Plan policies and 2011 PEIR mitigation measures would mitigate potentially significant impacts related to housing within a 100-year flood hazard area to a level below significant.

5. **Significant Effect: Impeding or Redirecting Flood Flows.** Implementation of the project could impede or redirect flood flows, resulting in a potentially significant direct impact (Impact HY-7).

Finding: Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect as identified in the Final SEIR.

Mitigation Measures: No feasible mitigation beyond existing federal and state permitting requirements and compliance with the County's adopted 2011 GPU policies or 2011 GPU PEIR mitigation measures is available and could be applied to individual actions under the project.

Facts in Supporting Findings: The policies applicable to impeding or re-directing flood flows that were adopted as part of the 2011 GPU and are applicable to the project are Policies COS-5.1, LU-6.12, S-9.1, S-9.2, S-9.3, S-9.4, S-9.5, and S-10.1. The mitigation measures applicable to impeding or re-directing flood flows that were adopted as a part of the 2011 GPU PEIR and are applicable to the project are Hyd-1.2, Hyd-1.5, Hyd-2.5, Hyd-4.1, Hyd-4.2, Hyd-4.3, and Hyd-6.1.

Implementation of the adopted General Plan policies and 2011 PEIR mitigation measures would mitigate potentially significant impacts related to impeding or re-directing flood flows to a level below significant.

6. **Significant Effect: Dam Inundation and Flood Hazards.** The project could result in inundation risk associated with dam failure, resulting in a potentially significant impact (Impact HY-8).

Finding: Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect as identified in the Final SEIR.

Mitigation Measures: No feasible mitigation beyond existing federal and state permitting requirements and compliance with the County's adopted 2011 GPU policies or 2011 GPU PEIR mitigation measures is available and could be applied to individual actions under the project.

Facts in Supporting Findings: The policies applicable to dam inundation and flood hazards that were adopted as part of the 2011 GPU and are applicable to the project are Policies COS-5.1, LU-6.12, S-9.1, S-9.2, S-9.3, S-9.4, S-9.5, S-9.6, and S-10.1. The mitigation measures applicable to dam inundation and flood hazards that were adopted as a part of the 2011 GPU PEIR and are applicable to the project are Hyd-1.2, Hyd-1.5, Hyd-2.5, Hyd-4.1, Hyd-4.2, Hyd-4.3, Hyd-6.1, Hyd-8.1 and Hyd-8.2.

Implementation of the adopted General Plan policies and 2011 PEIR mitigation measures would mitigate potentially significant impacts related to dam inundation and flood hazards to a level below significant.

7. **Significant Effect: Seiche, Tsunami, and Mudflow Hazards.** The project would result in an increased risk of exposing people or structures to damage in the event of a mudflow, resulting in a potentially significant impact (Impact HY-9).

Finding: Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect as identified in the Final SEIR.

Mitigation Measures: No feasible mitigation beyond existing federal and state permitting requirements and compliance with the County's adopted 2011 GPU policies or 2011 GPU PEIR mitigation measures is available and could be applied to individual actions under the project.

Facts in Supporting Findings: The policies applicable to seiche, tsunami, and mudflow hazards that were adopted as part of the 2011 GPU and are applicable to the project are Policies COS-5.1, S-8.1, S-8.2, S-9.3 and S-9.6. The mitigation measures applicable to seiche, tsunami, and mudflow hazards that were adopted as a part of the 2011 GPU PEIR and are applicable to the project are Hyd-3.1, Hyd-3.2 and Hyd-3.3.

Implementation of the adopted General Plan policies and 2011 PEIR mitigation measures would mitigate potentially significant impacts related to seiche, tsunami, and mudflow hazards to a level below significant.

G. Mineral Resources

- 1. Significant Effect: Mineral Resources Recovery Sites.** The Proposed Project would result in changes in land use designations in areas classified as MRZ-2 and MRZ-3 that would not be compatible with mineral extraction activities. PSR Analysis Area PP30 was the only project area with mineral resource recovery sites that was located in an area where future mineral extraction activities could occur (and would not be precluded from mining activities due to existing land use constraints). The Proposed Project for PSR PP30 proposed a land use designation of SR-2, within a MRZ-2 area, and therefore, the Proposed Project resulted in a significant direct and cumulative impacts (MR-2 and MR-4). The Reduced Density Alternative is recommended for approval for PSR Analysis Area PP30 as it proposes an SR-10 designation in the area proposed for SR-2 under the Proposed Project Map. The SR-10 designation is a low enough density to not preclude a future mining operation. Therefore, the Staff Recommended Project would not result in significant impacts to mineral resource recovery sites.

Finding: Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect as identified in the Final SEIR.

Mitigation Measures: No feasible mitigation beyond existing federal and state permitting requirements and compliance with the County's adopted 2011 GPU policies or 2011 GPU PEIR mitigation measures is available and could be applied to individual actions under the project.

Facts in Supporting Findings: The policies applicable to impacts associated with mineral resources recovery sites that were adopted as part of the 2011 GPU and are applicable to the project are Policies COS-10.1, COS-10.2, COS-10.3, COS-10.4, COS-10.6, COS-10.8, and COS-10.9. The mitigation measures applicable to impacts associated with mineral resources recovery sites that were adopted as a part of the 2011 GPU PEIR and are applicable to the project are Min-1.1, Min-1.2, and Min-1.3.

The only PSR Analysis Areas or former CGSP Subareas with the potential to result in an impact associated with mineral resource recovery sites is PP30, as there are no existing land uses that would preclude future mining operation within the MRZ-2 or MRZ-3 areas. However, the recommendation for PSR Analysis Area PP30 is the Reduced Density Alternative, which proposes an SR-10 designation. The SR-10 designation is a low enough density to not preclude future mining operations. In addition, implementation of the adopted General Plan policies and 2011 PEIR mitigation measures would mitigate potentially significant impacts related to mineral resource recovery sites to a level below significant.

H. Noise

1. **Significant Effect: Excessive Noise Levels.** The project would have the potential to introduce additional noise-sensitive land uses to noise impacts from roadways, railroads, commercial land use, and agricultural operations. Implementation of the project would result in direct and cumulative impacts related to excessive noise levels (Impact NO-1 and Impact NO-5).

Finding: Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect as identified in the Final SEIR.

Mitigation Measures: No feasible mitigation beyond existing federal and state permitting requirements and compliance with the County's adopted 2011 GPU policies or 2011 GPU PEIR mitigation measures is available and could be applied to individual actions under the project.

Facts in Supporting Findings: The policies applicable to excessive noise levels that were adopted as part of the 2011 GPU and are applicable to the project are Policies LU-2.8, M-1.3, M-2.4, N-1.4, N-1.5, N-2.1, N-2.2, N-4.2, N-4.3, N-4.6, N-4.7, N-4.8, N-5.1 and N-5.2. The mitigation measures applicable to excessive noise levels that were adopted as a part of the 2011 GPU PEIR and are applicable to the project are Noi-1.1, Noi-1.2, Noi-1.3, Noi-1.4, Noi-1.5, Noi-1.6, Noi-1.7, Noi-1.8, and Noi-1.9.

Compliance with existing regulations and the General Plan policies, guidelines, and standards would reduce potential noise impacts in most locations to a less-than-significant level. Future discretionary projects that may have potential impacts under the Staff Recommended Project would be required to produce a Noise Impact Analysis report consistent with the County of San Diego Report Format and Content Requirements to demonstrate consistency with these standards. Furthermore, compliance with the adopted General Plan Noise Element policies would reduce noise impacts on noise-sensitive land uses. Future development would be required to comply with all standards established by the County. Mitigation measures would be required for any significant impacts. Therefore, direct and cumulative impacts on noise-sensitive land uses would be reduced to a less-than-significant level.

Implementation of the adopted General Plan policies and 2011 PEIR mitigation measures would mitigate potentially significant impacts related to excessive noise levels to a level below significant.

2. **Significant Effect: Excessive Groundborne Vibration.** Implementation of the project would cause impacts related to excessive groundborne vibration from construction activities and railways that would be potentially significant (Impact NO-2).

Finding: Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect as identified in the Final SEIR.

Mitigation Measures: No feasible mitigation beyond existing federal and state permitting requirements and compliance with the County's adopted 2011 GPU policies or 2011 GPU PEIR mitigation measures is available and could be applied to individual actions under the project.

Facts in Supporting Findings: The policies applicable to excessive groundborne vibration that were adopted as part of the 2011 GPU and are applicable to the project are Policies N-3.1, N-4.7, N-5.2, N-6.3, and N-6.4. The mitigation measures applicable to excessive groundborne vibration that were adopted as a part of the 2011 GPU PEIR and are applicable to the project are Noi-2.1, Noi-2.2, Noi-2.3, and Noi-2.4.

Implementation of the adopted General Plan policies and 2011 PEIR mitigation measures would mitigate potentially significant impacts related to excessive groundborne vibration to a level below significant.

3. **Significant Effect: Temporary Increase in Ambient Noise Level.** The project would cause impacts related to a temporary increase in ambient noise levels from construction that would be potentially significant (Impact NO-4).

Finding: Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect as identified in the Final SEIR.

Mitigation Measures: No feasible mitigation beyond existing federal and state permitting requirements and compliance with the County's adopted 2011 GPU policies or 2011 GPU PEIR mitigation measures is available and could be applied to individual actions under the project.

Facts in Supporting Findings: The policies applicable to a temporary increase in ambient noise levels that were adopted as part of the 2011 GPU and are applicable to the project are Policies N-6.1, N-6.2, N-6.3, N-6.4, and N-6.6. The mitigation measures applicable to a temporary increase in ambient noise levels that were adopted as a part of the 2011 GPU PEIR and are applicable to the project are Noi-4.1 and Noi-4.2.

Implementation of the adopted General Plan policies and 2011 PEIR mitigation measures would mitigate potentially significant impacts related to a temporary increase in ambient noise levels to a level below significant.

I. Public Services

- 1. Significant Effect: Fire Protection Services.** The project would result in a potentially significant impact associated with fire response times and the construction or expansion of fire protection facilities (Impact PS-1). Additionally, the project, in combination with the identified cumulative projects, would result in a cumulatively considerable contribution to a significant cumulative impact associated with fire protection services (Impact PS-5).

Finding: Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect as identified in the Final SEIR.

Mitigation Measures: No feasible mitigation beyond existing federal and state permitting requirements and compliance with the County's adopted 2011 GPU policies or 2011 GPU PEIR mitigation measures is available and could be applied to individual actions under the project.

Facts in Supporting Findings: The policies applicable to fire protection services that were adopted as part of the 2011 GPU and are applicable to the project are Policies LU-1.4, LU-6.4, LU-6.11, LU-12.3, LU-12.4, S-3.4, S-5.1, S-5.2, S-6.1, S-6.2, S-6.3, S-6.4, and S-6.5. The mitigation measures applicable to fire protection services that were adopted as a part of the 2011 GPU PEIR and are applicable to the project are Pub-1.1, Pub-1.2, Pub-1.3, Pub-1.4, Pub-1.5, Pub-1.6, Pub-1.7, Pub-1.8, and Pub-1.9.

Implementation of the adopted General Plan policies and 2011 PEIR mitigation measures would mitigate direct and cumulative impacts related to fire protection services to a level below significant.

- 2. Significant Effect: Police Protection Services.** The project would allow for population and housing growth that would increase the need for law enforcement services, including the need for new facilities to maintain levels of service, the construction of which would result in a potentially significant impact (Impact PS-2). Additionally, the project would result in a significant cumulative impact associated with the construction of police facilities (Impact PS-6).

Finding: Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect as identified in the Final SEIR.

Mitigation Measures: No feasible mitigation beyond existing federal and state permitting requirements and compliance with the County's adopted 2011 GPU policies or 2011 GPU PEIR mitigation measures is available and could be applied to individual actions under the project.

Facts in Supporting Findings: The policies applicable to fire protection services that were adopted as part of the 2011 GPU and are applicable to the project are Policies LU-1.4, LU-12.3, and LU-12.4. The mitigation measures applicable to fire protection services that were adopted as a part of the 2011 GPU PEIR and are applicable to the project are Pub-1.1, Pub-1.2, and Pub-1.3.

Implementation of the adopted General Plan policies and 2011 PEIR mitigation measures would mitigate direct and cumulative impacts related to police protection services to a level below significant.

- 3. Significant Effect: Other Public Services.** The project would result in a potentially significant impact associated with the construction or expansion of library facilities (Impact PS-4). Additionally, the project, in combination with the identified cumulative projects, would result in a cumulatively considerable contribution to a significant cumulative impact associated with library facilities (Impact PS-8).

Finding: Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect as identified in the Final SEIR.

Mitigation Measures: No feasible mitigation beyond existing federal and state permitting requirements and compliance with the County's adopted 2011 GPU policies or 2011 GPU PEIR mitigation measures is available and could be applied to individual actions under the project.

Facts in Supporting Findings: The policies applicable to other public services that were adopted as part of the 2011 GPU and are applicable to the project are Policies LU-1.4, LU-9.4, LU-9.7, LU-12.3, LU-12.4, LU-18.1, and LU-18.2. The mitigation measures applicable to other public services that were adopted as a part of the 2011 GPU PEIR and are applicable to the project are Pub-1.1, Pub-1.2, and Pub-1.3.

Implementation of the adopted General Plan policies and 2011 PEIR mitigation measures would mitigate direct and cumulative impacts related to other public services to a level below significant.

J. Recreation

- 1. Significant Effect: Deterioration of Parks and Recreational Facilities.** Increased physical deterioration of parks and recreational facilities from increased use associated with the project would result in a potentially significant impact on parks and recreational resources (Impact RC-1). Additionally, the project, in combination with other identified cumulative projects in the region, would result in a cumulatively considerable contribution to a potentially significant impact related to the deterioration of parks and recreational facilities (Impact RC-3).

Finding: Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect as identified in the Final SEIR.

Mitigation Measures: No feasible mitigation beyond existing federal and state permitting requirements and compliance with the County's adopted 2011 GPU policies or 2011 GPU PEIR mitigation measures is available and could be applied to individual actions under the project.

Facts in Supporting Findings: The policies applicable to deterioration of parks and recreational facilities that were adopted as part of the 2011 GPU and are applicable to the project are Policies COS-21.1, COS-21.2, COS-22.1, COS-23.1, COS-23.2, COS-24.1,

COS-24.2, H-2.2, LU-12.1, LU-12.2, M-12.1, M-12.2, M-12.3, M-12.4, M-12.5, M-12.6, M-12.7, M-2.8, and M-12.10. The mitigation measures applicable to deterioration of parks and recreational facilities that were adopted as a part of the 2011 GPU PEIR and are applicable to the project are Rec-1.1, Rec-1.2, Rec-1.3, Rec-1.4, Rec-1.5, Rec-1.6, Rec-1.7, Rec-1.8, Rec-1.9, Rec-1.10, and Rec-1.11.

Implementation of the adopted General Plan policies and 2011 PEIR mitigation measures would mitigate direct and cumulative impacts related to deterioration of parks and recreational facilities to a level below significant.

2. **Significant Effect: Construction or Expansion of Recreational Facilities.** To meet the acreage goal identified for local parks in the adopted General Plan, the construction of new recreational facilities or the expansion of existing facilities would be required to serve the future population as a result of park deficiencies; therefore, the project would result in a potentially significant impact related to the construction of recreational facilities (Impact RC-2). Additionally, the project, in combination with other identified cumulative projects in the region, would result in a cumulatively considerable contribution to a potentially significant impact related to the construction or expansion of recreational facilities (Impact RC-4).

Finding: Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect as identified in the Final SEIR.

Mitigation Measures: No feasible mitigation beyond existing federal and state permitting requirements and compliance with the County's adopted 2011 GPU policies or 2011 GPU PEIR mitigation measures is available and could be applied to individual actions under the project.

Facts in Supporting Findings: The policies applicable to the construction or expansion of recreational facilities that were adopted as part of the 2011 GPU and are applicable to the project are Policies COS-21.2, COS-21.3, COS-21.4, COS-23.1, COS-23.3, H-2.2, LU-6.4, LU-9.7, LU-18.2, M-12.5, M-12.9, and M-12.10. The mitigation measures applicable to the construction or expansion of recreational facilities that were adopted as a part of the 2011 GPU PEIR and are applicable to the project are Rec-1.1, Rec-1.2, Rec-1.3, Rec-1.4, Rec-1.8, Rec-1.9, Rec-1.11, Rec-2.1, Rec-2.2, Rec-2.3, Rec-2.4, Rec-2.5, and Rec-2.6.

Implementation of the adopted General Plan policies and 2011 PEIR mitigation measures would mitigate direct and cumulative impacts related to the construction or expansion of recreational facilities to a level below significant.

K. Transportation and Traffic

1. **Significant Effect: Emergency Access.** Implementation of the project would result in the potential for inadequate emergency access due to increased traffic on a roadway network that is incomplete or not fully connected, or on dead-end or one-way roads. Therefore, implementation of the project would result in a potentially significant impact on emergency access (Impact TR-3).

Finding: Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect as identified in the Final SEIR.

Mitigation Measures: No feasible mitigation beyond existing federal and state permitting requirements and compliance with the County's adopted 2011 GPU policies or 2011 GPU PEIR mitigation measures is available and could be applied to individual actions under the project.

Facts in Supporting Findings: The policies applicable to emergency access that were adopted as part of the 2011 GPU and are applicable to the project are Policies LU-2.8, LU-6.10, LU-12.2, M-1.2, M-3.3, M-4.4, S-3.4, S-3.5, and S-14.1. The mitigation measures applicable to emergency access that were adopted as a part of the 2011 GPU PEIR and are applicable to the project are Tra-1.3, Tra-1.4, Tra-1.6, Tra-4.1, Tra-4.2, Tra-4.3, and Tra-4.4.

Implementation of the adopted General Plan policies and 2011 PEIR mitigation measures would mitigate impacts related to emergency access to a level below significant.

2. **Significant Effect: Alternative Transportation.** The project would allow for increased density and population growth that would increase demand for alternative modes of transportation. Therefore, the project would result in a potentially significant direct impact on alternative transportation plans and policies (Impact TR-4).

Finding: Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect as identified in the Final SEIR.

Mitigation Measures: No feasible mitigation beyond existing federal and state permitting requirements and compliance with the County's adopted 2011 GPU policies or 2011 GPU PEIR mitigation measures is available and could be applied to individual actions under the project.

Facts in Supporting Findings: The policies applicable to alternative transportation that were adopted as part of the 2011 GPU and are applicable to the project are Policies LU-5.1, LU-5.4, LU-5.5, LU-9.8, LU-11.6, M-3.1, M-3.2, M-4.3, M-8.1, M-8.2, M-8.3, M-8.4, M-8.5, M-8.6, M-8.7, M-9.2, M-9.4, M-11.1, M-11.2, M-11.3, M-11.4, M-11.5, M-11.6, and M-11.7. The mitigation measures applicable to alternative transportation that were adopted as a part of the 2011 GPU PEIR and are applicable to the project are Tra-4.1, Tra-4.2, Tra-6.1, Tra-6.2, Tra-6.3, Tra-6.4, Tra-6.5, Tra-6.6, Tra-6.7, Tra-6.8 and Tra-6.9.

Implementation of the adopted General Plan policies and 2011 PEIR mitigation measures would mitigate impacts related to alternative transportation to a level below significant.

L. Utilities and Service Systems

1. **Significant Effect: Wastewater Treatment Requirements.** Implementation of the project would potentially result in the demand for wastewater treatment services to increase at a rate disproportionate to facility capabilities, which would have the potential to result in a violation in wastewater treatment standards. Therefore, the project would result in a potentially significant impact (Impact UT-1).

Finding: Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect as identified in the Final SEIR.

Mitigation Measures: No feasible mitigation beyond existing federal and state permitting requirements and compliance with the County's adopted 2011 GPU policies or 2011 GPU PEIR mitigation measures is available and could be applied to individual actions under the project.

Facts in Supporting Findings: The policies applicable to wastewater treatment requirements that were adopted as part of the 2011 GPU and are applicable to the project are Policies LU-9.4, LU-12.1, LU-12.2, LU-14.1, LU-14.2, LU-14.3, and LU-14.4. The mitigation measures applicable to wastewater treatment requirements that were adopted as a part of the 2011 GPU PEIR and are applicable to the project are USS-1.1, USS-1.2, and USS-1.3.

Implementation of the adopted General Plan policies and 2011 PEIR mitigation measures would mitigate impacts related to wastewater treatment requirements to a level below significant.

- 2. Significant Effect: New Water or Wastewater Treatment Facilities.** Subsequent development associated with the GPA and Rezone would potentially require or result in a need for new water or wastewater facilities, or the expansion of existing facilities, the construction of which could cause significant environmental effects (Impact UT-2).

Finding: Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect as identified in the Final SEIR.

Mitigation Measures: No feasible mitigation beyond existing federal and state permitting requirements and compliance with the County's adopted 2011 GPU policies or 2011 GPU PEIR mitigation measures is available and could be applied to individual actions under the project.

Facts in Supporting Findings: The policies applicable to new water and wastewater treatment facilities that were adopted as part of the 2011 GPU and are applicable to the project are Policies H-1.3, LU-1.2, and LU-4.3. The mitigation measures applicable to new water and wastewater treatment facilities that were adopted as a part of the 2011 GPU PEIR and are applicable to the project are USS-2.1, USS-2.2, and USS-2.3.

Implementation of the adopted General Plan policies and 2011 PEIR mitigation measures would mitigate impacts related to new water and wastewater treatment facilities to a level below significant.

- 3. Significant Effect: Sufficient Stormwater Drainage Facilities.** Future development allowed under the project would result in the need for new stormwater drainage facilities, the construction of which could cause significant environmental effects (Impact UT-3).

Finding: Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect as identified in the Final SEIR.

Mitigation Measures: No feasible mitigation beyond existing federal and state permitting requirements and compliance with the County's adopted 2011 GPU policies or 2011 GPU PEIR mitigation measures is available and could be applied to individual actions under the project.

Facts in Supporting Findings: The policies applicable to sufficient stormwater drainage facilities that were adopted as part of the 2011 GPU and are applicable to the project are Policies COS-4.3, LU-6.5, and LU-6.9. The mitigation measures applicable to sufficient stormwater drainage facilities that were adopted as a part of the 2011 GPU PEIR and are applicable to the project are USS-3.1, USS-3.2, USS-3.3, USS-3.4, and USS-3.5.

Implementation of the adopted General Plan policies and 2011 PEIR mitigation measures would mitigate impacts related to sufficient stormwater drainage facilities to a level below significant.

4. **Significant Effect: Adequate Wastewater Facilities.** The expansion of demand on existing wastewater treatment infrastructure would potentially lead to inadequate wastewater facilities. Therefore, the project would result in potentially significant impacts associated with inadequate wastewater facilities (Impact UT-5).

Finding: Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect as identified in the Final SEIR.

Mitigation Measures: No feasible mitigation beyond existing federal and state permitting requirements and compliance with the County's adopted 2011 GPU policies or 2011 GPU PEIR mitigation measures is available and could be applied to individual actions under the project.

Facts in Supporting Findings: The policies applicable to adequate wastewater facilities that were adopted as part of the 2011 GPU and are applicable to the project are Policies LU-9.4, LU-12.1, LU-12.2, LU-14.1, LU-14.2, LU-14.3, and LU-14.4. The mitigation measures applicable to adequate wastewater facilities that were adopted as a part of the 2011 GPU PEIR and are applicable to the project are USS-1.1, USS-1.2, and USS-1.3.

Implementation of the adopted General Plan policies and 2011 PEIR mitigation measures would mitigate impacts related to adequate wastewater facilities to a level below significant.

M. Global Climate Change

1. **Significant Effect: Generation of Greenhouse Gases.** Implementation of the GPA and Rezone would result in potentially significant cumulative impacts associated with the generation of greenhouse gas (GHG) emissions (Impact CC-1 and Impact CC-1-3).

Finding: Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect as identified in the Final SEIR.

Mitigation Measures:

PSR Mitigation Measure M-GHG-1: The County shall require future projects implemented under the GPA and Rezone, that increase their emissions above what is allowed in the 2011 GPU PEIR to reduce their emissions to ensure that CAP emission forecasts are not substantially altered such that attainment of GHG reduction targets could not be achieved. Project applicants could accomplish this through two options, as outlined below:

Option 1 (No Net Increase): PSR project applicants shall achieve no net increase in GHG emissions from additional density or development intensity (e.g., new zoning use categories not previously allowed) above the 2011 GPU/zoning over the life of the project (30 years). Applicants shall be required in their respective CEQA documents to quantify the GHG emissions from their projects that exceed the GHG emissions for the 2011 GPU density or intensity forming the basis of the County of San Diego Draft Climate Action Plan (CAP) emission forecasts (i.e., projections). This increase in emissions shall be reduced through on-site design features and mitigation measures, and by off-site mitigation, including purchase of carbon offset credits by the applicant, if needed. Applicants shall demonstrate compliance with relevant CAP measures as identified in the “CAP Consistency Review Checklist” in addition to all feasible on-site design features and mitigation measures. Off-site mitigation, including purchase of carbon offset credits, would be allowed after all feasible on-site design features and mitigation measures have been incorporated. For example, if 400 residential units were allowed under the 2011 GPU and a PSR applicant proposes 500 residential units, the emissions for the additional 100 units would be calculated and offset through compliance with the CAP Consistency Review Checklist and additional feasible on-site measures and off-site measures, including the use of carbon offsets. The emissions associated with the allowable density of 400 units would be mitigated through compliance with the CAP Consistency Review Checklist (Appendix F).

The County will consider, to the satisfaction of the Director of Planning & Development Services (PDS), the following geographic priorities for GHG reduction features, and GHG reduction projects and programs: 1) project design features/onsite reduction measures; 2) off-site within the unincorporated areas of the County of San Diego; 3) off-site within the County of San Diego; 4) off-site within the State of California; 5) off-site within the United States; and 6) off-site internationally.

If carbon offset credits are provided as mitigation after all feasible measures are provided on site, the applicant, or its designee, shall purchase and retire carbon offsets in a quantity sufficient to offset the net increase from GHG emissions above the density or intensity allowed in the 2011 GPU for the life of the project (i.e., 30 years). This includes all GHG emissions from construction (including sequestration loss from vegetation removal) and operations.

Carbon offset credits must be purchased through any of the following: (i) a CARB-approved registry, such as the Climate Action Reserve, the American Carbon Registry, and the Verified Carbon Standard, (ii) any registry approved by CARB to act as a registry under the state’s cap-and-trade program, (iii) through the CAPCOA GHG Rx and the SDAPCD, or (iv) if no registry is in existence as identified in options (i), (ii), or (iii), above, then any other reputable registry or entity that issues carbon offsets

consistent with California Health & Safety Code section 38562(d)(1)), to the satisfaction of the Director of PDS.

If utilizing the purchase of carbon credits to fulfill the requirement to offset GHG emissions associated with the increased development, prior to County's issuance of the project's first grading permit (for construction GHG emissions) or first building permit (for operations GHG emissions) the applicant, or its designee, shall provide evidence to the satisfaction of the Director of PDS that the project applicant or its designee has purchased and retired carbon offsets in a quantity sufficient to offset the net increase of construction and operations GHG emissions generated by the project. Operations emissions may be offset in phases, commensurate with the overall phasing of the project.

Option 2 (Net Zero): PSR project applicants shall reduce all project GHG emissions to net zero to achieve no net increase over baseline conditions (i.e., carbon neutrality). Project emissions shall be reduced to zero through on-site design features and mitigation measures and off-site mitigation, including purchase of carbon offset credits by the applicant or its designee. Applicants shall demonstrate compliance with relevant CAP measures as identified in the "CAP Consistency Review Checklist" before considering additional feasible on-site design features and mitigation measures. Off-site mitigation, including purchase of carbon offset credits, would be allowed after all feasible on-site design features and mitigation measures have been incorporated.

The County will consider, to the satisfaction of the Director of Planning & Development Services (PDS), the following geographic priorities for GHG reduction features, and GHG reduction projects and programs: 1) project design features/onsite reduction measures; 2) off-site within the unincorporated areas of the County of San Diego; 3) off-site within the County of San Diego; 4) off-site within the State of California; 5) off-site within the United States; and 6) off-site internationally.

If carbon offset credits are provided as mitigation after all feasible measures are provided on-site, the applicant, or its designee, shall purchase and retire carbon offsets in a quantity sufficient to offset the net increase from GHG emissions above the density or intensity allowed in the 2011 GPU for the life of the project (i.e., 30 years). This includes all GHG emissions from construction (including sequestration loss from vegetation removal) and operations.

Carbon offset credits must be purchased through any of the following: (i) a CARB-approved registry, such as the Climate Action Reserve, the American Carbon Registry, and the Verified Carbon Standard, (ii) any registry approved by CARB to act as a registry under the state's cap-and-trade program, (iii) through the CAPCOA GHG Rx and the SDAPCD, or (iv) if no registry is in existence as identified in options (i), (ii), or (iii), above, then any other reputable registry or entity that issues carbon offsets consistent with California Health & Safety Code section 38562(d)(1)), to the satisfaction of the Director of PDS.

If utilizing the purchase of carbon credits to fulfill the requirement to offset GHG emissions associated with the increased development, prior to County's issuance of the project's first grading permit (for construction GHG emissions) or first building permit (for operations GHG emissions) the applicant, or its designee, shall provide evidence to the satisfaction of the Director of PDS that the project applicant or its

designee has purchased and retired carbon offsets in a quantity sufficient to offset the net increase of construction and operations GHG emissions generated by the project. Operations emissions may be offset in phases, commensurate with the overall phasing of the project.

Facts in Supporting Findings: The policies applicable to generation of GHG emissions that were adopted as part of the 2011 GPU and are applicable to the Project are Policies COS-15.1 and COS-17.1. The mitigation measures applicable to generation of greenhouse gas emissions that were adopted as a part of the 2011 GPU PEIR and are applicable to the Project are CC-1.1, CC-1.2, CC-1.3, CC-1.4, CC-1.5, CC-1.6, CC-1.9, CC-1.10, CC-1.11, CC-1.12, CC-1.13, CC-1.14, CC-1.15, CC-1.16, CC-1.17, and CC-1.18. PSR mitigation measure M-GHG-1 described above is also required to reduce the generation of greenhouse gas emissions.

Implementation of the adopted General Plan policies, the 2011 PEIR mitigation measures, and PSR mitigation measure M-GHG-1 would mitigate impacts related to generation of greenhouse gas emissions to a level below significant.

2. **Significant Effect: Conflict with Applicable Plan, Policy, or Regulation.** Implementation of the project could result in a potentially significant impact associated with applicable plans, policies, or regulations adopted for reducing the emissions of GHG (Impact CC-2 and Impact CC-4).

Finding: Changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effect as identified in the Final SEIR.

Mitigation Measures:

PSR Mitigation Measure M-GHG-1: See description above.

Facts in Supporting Findings: The policies applicable to conflict with applicable plan, policy, or regulation that were adopted as part of the 2011 GPU and are applicable to the project are Policies COS-15.1 and COS-17.1. The mitigation measures applicable to conflict with applicable plan, policy, or regulation that were adopted as a part of the 2011 GPU PEIR and are applicable to the project are CC-1.1, CC-1.2, CC-1.3, CC-1.4, CC-1.5, CC-1.6, CC-1.9, CC-1.10, CC-1.11, CC-1.12, CC-1.13, CC-1.14, CC-1.15, CC-1.16, CC-1.17, and CC-1.18. PSR mitigation measure M-GHG-1 would also be applicable to the project for compliance with applicable plans, policies, or regulations adopted for reducing the emissions of GHG.

Implementation of the adopted General Plan policies, the 2011 PEIR mitigation measures, and PSR mitigation measure M-GHG-1 would mitigate impacts related to the potential to conflict with an applicable plan, policy, or regulation to a level below significant.

III. CEQA GUIDELINES SECTION 15091 FINDINGS FOR POTENTIALLY SIGNIFICANT IMPACTS FOR WHICH FEASIBLE MITIGATION MEASURES OR ALTERNATIVES ARE NOT AVAILABLE (CEQA GUIDELINES SECTION 15091(A)(3))

Pursuant to Section 21081(A) of the Public Resources Code and Section 15091(A)(3) of the State CEQA Guidelines, the County of San Diego Board of Supervisors finds that, for each of the following significant effects identified in the Final SEIR, specific economic, legal, social, technological, or other considerations, make infeasible the mitigation measures or alternatives identified in the SEIR. These findings are explained below and are supported by substantial evidence in the record of proceedings.

In adopting these findings, the County concurrently adopts a Mitigation, Monitoring and Reporting Program (MMRP) pursuant to Public Resources Code section 21081.6. This MMRP is designed to ensure the Staff Recommended Project complies with the feasible mitigation measures identified below during implementation of the Staff Recommended Project and is incorporated herein by this reference.

A. Aesthetics

- 1. Significant Effect: Visual Character or Quality.** Implementation of the project would allow increased development densities to occur in some areas, which would result in the potential degradation of the existing visual character or quality of a community. Therefore, the project would result in a potentially significant impact on visual character and quality (Impact AE-3). Additionally, the project would result in a potentially significant cumulative impact (Impact AE-7).

Finding: Specific economic, legal, social, technological, or other considerations make infeasible the mitigation measures or project alternatives identified in the Final SEIR. Effects remain significant and unavoidable.

Mitigation Measures: No feasible mitigation beyond existing federal and state permitting requirements and compliance with the County's adopted 2011 GPU policies or 2011 GPU PEIR mitigation measures is available and could be applied to individual actions under the project.

Facts in Supporting Findings: The policies applicable to visual character or quality that were adopted as part of the 2011 GPU and are applicable to the project are Policies H-2.1, LU-1.4, LU-2.1, LU-2.3, LU-2.5, LU-4.1, LU4.2, LU-4.3, LU-4.4, LU-11.2, LU-12.4, and M-10.6. The mitigation measures applicable to aesthetic and visual resources that were adopted as a part of the 2011 GPU PEIR and are applicable to the project are Aes-1.1, Aes-1.2, Aes-1.3, Aes-1.4, Aes-1.5, Aes-1.6, Aes-1.7, Aes-1.8, Aes-1.9, and Aes-1.10, Aes-3.1, and Aes-3.2.

Even with implementation of 2011 GPU policies and 2011 GPU PEIR mitigation measures, because specific development projects that would be undertaken within Analysis Areas have not yet been identified, it is not possible to guarantee that all impacts on visual character or quality would be reduced to less than significant. No other feasible mitigation is available. For the reasons stated in Sections 2.1.6.3 and 4.2.1.1 of the Final SEIR, the direct and cumulative impacts would remain significant and unavoidable.

Implementation of the adopted General Plan policies and 2011 PEIR mitigation measures would reduce direct and cumulative impacts on visual character and quality but not to a level below significant. Impact AE-3 and Impact AE-7 would remain significant and unavoidable because the character of some communities would change as growth continues regardless of the amount of zoning regulations and design review imposed.

Reference: Final SEIR Sections 2.1 and 4.2.1.1, aesthetics-related responses to comments in Chapter 8 of the Final SEIR, and all other aesthetics-related evidence in the administrative record.

2. **Significant Effect: Light or Glare.** The project would have the potential to result in increased light and glare within the County that would adversely affect day or nighttime views. PSR Analysis Areas BO18+, DS8, DS24, FB2+, FB17, FB19+, FB21+, ME26, ME30A, NC3A, NC18A, NC22, NC37, NC38+, PP30, SD15, VC7+, VC51, VC57+, VC67, and former Champagne Gardens Specific Plan (CGSP) Subareas CG1, CG2, CG3, CG4, CG5, CG6, CG7, and CG8 would result in potentially significant impacts associated with increased light and glare. PSR Analysis Areas SD15 and VC67 would have the potential to result in potentially significant impacts associated with a substantial increase in glare (Impact AE-4). Additionally, the project would result in a potentially significant cumulative impact (Impact AE-8).

Finding: Specific economic, legal, social, technological, or other considerations make infeasible the mitigation measures or project alternatives identified in the Final SEIR. Effects remain significant and unavoidable.

Mitigation Measures: No feasible mitigation beyond existing federal and state permitting requirements and compliance with the County's adopted 2011 GPU policies or 2011 GPU PEIR mitigation measures is available and could be applied to individual actions under the project.

Facts in Supporting Findings: The policies applicable to light or glare that were adopted as part of the 2011 GPU and are applicable to the project are Policies COS-13.1, COS-13.2, and COS-13.3. The mitigation measures applicable to light or glare that were adopted as a part of the 2011 GPU PEIR and are applicable to the project are Aes-4.1, Aes-4.2, and Aes-4.3.

Even with implementation of 2011 GPU policies and 2011 GPU PEIR mitigation measures, because specific development projects that would be undertaken in Analysis Areas have not yet been identified, it is not possible to guarantee that all impacts on light or glare would be reduced to less than significant. No other feasible mitigation is available. For the reasons stated in Section 2.1 of the Final SEIR, the direct and cumulative impacts would remain significant and unavoidable.

Implementation of adopted General Plan policies and 2011 PEIR mitigation measures, in combination with other applicable regulations, including the Light Pollution Code and the San Diego County Zoning Ordinance, would reduce direct Impact AE-4 and cumulative Impact AE-8 on nighttime lighting and glare but not to a level below significant. Impacts would remain significant and unavoidable.

Reference: Final SEIR Sections 2.1 and 4.2.1.1, aesthetics-related responses to comments in Chapter 8 of the Final SEIR, and all other aesthetics-related evidence in the administrative record.

B. Agriculture and Forestry Resources

- 1. Significant Effect: Conversion of Agricultural Resources.** The project would have the potential to convert FMMP-designated agricultural resources to non-agricultural use and County-identified agricultural land to non-agricultural use, which is considered a potentially significant impact (Impact AG-1). In combination with other cumulative projects, including development projects allowable under surrounding jurisdictions' general plans and tribal lands, the project would contribute to a cumulative impact associated with the direct conversion of agricultural land (Impact AG-4).

Finding: Specific economic, legal, social, technological, or other considerations make infeasible the mitigation measures or project alternatives identified in the Final SEIR. Effects remain significant and unavoidable.

Mitigation Measures: No feasible mitigation beyond existing federal and state permitting requirements and compliance with the County's adopted 2011 GPU policies or 2011 GPU PEIR mitigation measures is available and could be applied to individual actions under the project.

Facts in Supporting Findings: The policies applicable to conversion of agricultural resources that were adopted as part of the 2011 GPU and are applicable to the project are Policies COS-6.4, LU-6.4, LU-7.1, and LU 7.2. The mitigation measures applicable to conversion of agricultural resources that were adopted as a part of the 2011 GPU PEIR and are applicable to the project are Agr-1.1, Agr-1.2, Agr-1.3, Agr-1.4, and Agr-1.5.

Even with implementation of 2011 GPU policies and 2011 GPU PEIR mitigation measures, because specific development projects that would be undertaken in Analysis Areas have not yet been identified, it is not possible to guarantee that all direct agricultural conversion impacts would be reduced to less than significant. No other feasible mitigation is available. For the reasons stated in Sections 2.2 and 4.2.1.2 of the Final SEIR, the direct and cumulative impacts would remain significant and unavoidable.

Reference: Final SEIR Sections 2.2 and 4.2.1.2, agriculture and forestry resources–related responses to comments in Chapter 8 of the Final SEIR, and all other agriculture and forestry resources–related evidence in the administrative record.

- 2. Significant Effect: Indirect Conversion of Agricultural Resources.** Implementation of the project would increase densities in areas containing agricultural resources and potentially cause some indirect conversion of agricultural resources to nonagricultural use, which is considered a potentially significant impact (Impact AG-2). In combination with other cumulative projects, such as development projects allowable under surrounding jurisdictions' general plans and tribal projects, the project would contribute to a cumulative impact associated with the indirect conversion of agricultural land (Impact AG-5).

Finding: Specific economic, legal, social, technological, or other considerations make infeasible the mitigation measures or project alternatives identified in the Final SEIR. Effects remain significant and unavoidable.

Mitigation Measures: No feasible mitigation beyond existing federal and state permitting requirements and compliance with the County's adopted 2011 GPU policies or 2011 GPU PEIR mitigation measures is available and could be applied to individual actions under the project.

Facts in Supporting Findings: The policies applicable to indirect conversion of agricultural resources that were adopted as part of the 2011 GPU and are applicable to the project are Policies COS-6.2 and COS-6.3. The mitigation measures applicable to indirect conversion of agricultural resources that were adopted as a part of the 2011 GPU PEIR and are applicable to the project are Agr-1.1, Agr-1.2, Agr-1.3, Agr-1.4, and Agr-1.5.

Even with implementation of 2011 GPU policies and 2011 GPU PEIR mitigation measures, because specific development projects that would be undertaken in Analysis Areas have not yet been identified, it is not possible to guarantee that all indirect agricultural conversion impacts would be reduced to less than significant. No other feasible mitigation is available. For the reasons stated in Sections 2.2 and 4.2.1.2 of the Final SEIR, the direct and cumulative impacts would remain significant and unavoidable.

Reference: Final SEIR Sections 2.2 and 4.2.1.2, agriculture and forestry resources–related responses to comments in Chapter 8 of the Final SEIR, and all other agriculture and forestry resources–related evidence in the administrative record.

C. Air Quality

- 1. Significant Effect: Air Quality Plans.** The project would result in more intense land uses and contribute to local population growth, employment growth, and associated increases in vehicle miles traveled (VMT) that is not accounted for in the General Plan. Therefore, impacts associated with obstruction of local air quality plans would be potentially significant (Impact AQ-1). Additionally, the project, in combination with the cumulative projects, would have the potential to result in a significant cumulative impact associated with Air Quality Plans (Impact AQ-5).

Finding: Specific economic, legal, social, technological, or other considerations make infeasible the mitigation measures or project alternatives identified in the Final SEIR. Effects remain significant and unavoidable.

Mitigation Measures:

PSR Mitigation Measure M-Air-1.1: The County of San Diego shall provide to SANDAG a revised population, employment, and housing forecast that reflects the anticipated growth generated from the project. The updated forecast provided to SANDAG shall be used to inform the APCD to update the RAQS and SIP. The County of San Diego also shall notify the APCD of this revised forecast for use in the future update to the RAQS and SIP as required.

PSR Mitigation Measure M-Air-1.2: All future construction of residential units on properties approved for increased densities or intensities shall have no wood-burning stoves and all fireplaces shall be fueled by natural gas.

Facts in Supporting Findings: The policies applicable to air quality plans that were adopted as part of the 2011 GPU and are applicable to the project are Policies COS-14.1, COS-14.2, COS-14.8, COS-14.9, COS-14.10, COS-15.1, COS-15.4, COS-15.5, COS-16.2, COS-16.3, and COS-20.3. The mitigation measures applicable to air quality plans that were adopted as a part of the 2011 GPU PEIR and are applicable to the project are Air-2.6, Air-2.7, and Air-2.9. Additionally, PSR mitigation measures M-Air-1.1 and M-Air-1.2 are applicable to the project.

Even with implementation of 2011 GPU policies and 2011 GPU PEIR mitigation measures, and PSR mitigation measures M-Air-1.1 and M-Air-1.2, because specific development

projects that would be implemented as a result of the project have not yet been identified, it is not possible to guarantee that all impacts on air quality plans would be reduced. No other feasible mitigation is available. For the reasons stated in Sections 2.3 and 4.2.1.3 of the Final SEIR, the direct and cumulative impacts would remain significant and unavoidable.

Reference: Final SEIR Sections 2.3 and 4.2.1.3, air quality–related responses to comments in Chapter 8 of the Final SEIR, and all other air quality–related evidence in the administrative record.

2. **Significant Effect: Air Quality Violations.** Implementation of the project would have the potential to cause significant direct and cumulative impacts on air quality violations (Impact AQ-2 and Impact AQ-6).

Finding: Specific economic, legal, social, technological, or other considerations make infeasible the mitigation measures or project alternatives identified in the Final SEIR. Effects remain significant and unavoidable.

Mitigation Measures:

PSR Mitigation Measure M-Air-1.2: See description above.

Facts in Supporting Findings: The policies applicable to air quality violations that were adopted as part of the 2011 GPU and are applicable to the project are Policies COS-14.1, COS-14.2, COS-14.8, COS-14.9, COS-14.10, COS-15.1, COS-15.4, COS-15.5, COS-16.2, COS-16.3, and COS-20.3. The mitigation measures applicable to air quality violations that were adopted as a part of the 2011 GPU PEIR and are applicable to the project are Air-2.5, Air-2.6, Air-2.7, and Air-2.9. Additionally, PSR mitigation measure M-Air-1.2 is applicable to the project.

Even with implementation of 2011 GPU policies and 2011 GPU PEIR mitigation measures, and PSR mitigation measure M-Air-1.2, because specific development projects that would be undertaken in Analysis Areas have not yet been identified, it is not possible to guarantee that all impacts on air quality violations would be reduced to less than significant. No other feasible mitigation is available. For the reasons stated in Sections 2.3 and 4.2.1.3 of the Final SEIR, the direct and cumulative impacts would remain significant and unavoidable.

Reference: Final SEIR Sections 2.3 and 4.2.1.3, air quality–related responses to comments in Chapter 8 of the Final SEIR, and all other air quality–related evidence in the administrative record.

3. **Significant Effect: Non-Attainment Criteria Pollutants.** Implementation of the project would result in a cumulatively considerable net increase of a criteria pollutant for which the San Diego Air Basin (SDAB) is in nonattainment under the National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS), and impacts would be potentially significant (Impact AQ-3 and Impact AQ-7).

Finding: Specific economic, legal, social, technological, or other considerations make infeasible the mitigation measures or project alternatives identified in the Final SEIR. Effects remain significant and unavoidable.

Mitigation Measures:

PSR Mitigation Measure M-Air-1.2: See description above.

Facts in Supporting Findings: The policies applicable to non-attainment criteria pollutants that were adopted as part of the 2011 GPU and are applicable to the Project are Policies COS-14.1, COS-14.2, COS-14.8, COS-14.9, COS-14.10, COS-15.1, COS-15.4, COS-15.5, COS-16.2, COS-16.3, and COS-20.3. The mitigation measures applicable to non-attainment criteria pollutants that were adopted as a part of the 2011 GPU PEIR and are applicable to the project are Air-2.5, Air-2.6, Air-2.7, and Air-2.9. Additionally, PSR mitigation measure M-Air-1.2 is applicable to the project.

Even with implementation of 2011 GPU policies and 2011 GPU PEIR mitigation measures, and PSR mitigation measure M-Air-1.2, because specific development projects that would be undertaken in Analysis Areas have not yet been identified, it is not possible to guarantee that all impacts associated with non-attainment criteria pollutants would be reduced to less than significant. No other feasible mitigation is available. For the reasons stated in Sections 2.3 and 4.2.1.3 of the Final SEIR, the direct and cumulative impacts would remain significant and unavoidable.

Reference: Final SEIR Sections 2.3 and 4.2.1.3, air quality–related responses to comments in Chapter 8 of the Final SEIR, and all other air quality–related evidence in the administrative record.

4. **Significant Effect: Sensitive Receptors.** Implementation of the project would result in potentially significant direct and cumulative impacts on sensitive receptors. (Impact AQ-4 and Impact AQ-8).

Finding: Specific economic, legal, social, technological, or other considerations make infeasible the mitigation measures or project alternatives identified in the Final SEIR. Effects remain significant and unavoidable.

Mitigation Measures: No feasible mitigation beyond existing federal and state permitting requirements and compliance with the County’s adopted 2011 GPU policies or 2011 GPU PEIR mitigation measures is available and could be applied to individual actions under the project.

Facts in Supporting Findings: The mitigation measure applicable to impacts on sensitive receptors adopted as a part of the 2011 GPU PEIR and applicable to the project is Air-4.1.

Even with implementation of the 2011 GPU PEIR mitigation measure, because specific development projects that would be undertaken in Analysis Areas have not yet been identified, it is not possible to guarantee that all impacts associated with sensitive receptors would be reduced to less than significant. No other feasible mitigation is available. For the reasons stated in Sections 2.3 and 4.2.1.3 of the Final SEIR, the direct and cumulative impacts would remain significant and unavoidable.

Reference: Final SEIR Sections 2.3 and 4.2.1.3, air quality–related responses to comments in Chapter 8 of the Final SEIR, and all other air quality–related evidence in the administrative record.

D. Biological Resources

1. **Significant Effect: Special-Status Species.** The project would have the potential to result in direct and indirect impacts on habitat types that support sensitive plant and wildlife

species (Impact BI-1). Additionally, the County has adopted a Multiple Species Conservation Program (MSCP) South County Subarea Plan for the southwestern portion of the County, but is still developing MSCP plans for North County and East County areas. Therefore, until the County has adopted the North County and East County plans, the project's contribution, in combination with other cumulative projects, would be cumulatively considerable (Impact BI-5).

Finding: Specific economic, legal, social, technological, or other considerations make infeasible the mitigation measures or project alternatives identified in the Final SEIR. Effects remain significant and unavoidable.

Mitigation Measures: No feasible mitigation beyond existing federal and state permitting requirements and compliance with the County's adopted 2011 GPU policies or 2011 GPU PEIR mitigation measures is available and could be applied to individual actions under the project.

Facts in Supporting Findings: The policies applicable to special-status species that were adopted as part of the 2011 GPU and are applicable to the project are Policies COS-1.3, COS-1.6, COS-1.7, COS-1.8, COS-1.9, COS-1.10, COS-1.11, COS-2.1, COS-2.2, LU-6.1, LU-6.2, LU-6.3, LU-6.4, LU-6.6, LU-6.7, and LU-10.2. The mitigation measures applicable to special-status species that were adopted as a part of the 2011 GPU PEIR and are applicable to the project are Bio-1.1, Bio-1.2, Bio-1.3, Bio-1.4, Bio-1.5, Bio-1.6, and Bio-1.7.

Even with implementation of 2011 GPU policies and 2011 GPU PEIR mitigation measures, because specific development projects that would be undertaken in Analysis Areas have not yet been identified, it is not possible to guarantee that all impacts on special-status species would be reduced to less than significant. No other feasible mitigation is available. For the reasons stated in Sections 2.4 and 4.2.1.4 of the Final SEIR, the direct and cumulative impacts would remain significant and unavoidable.

Reference: Final SEIR Sections 2.4 and 4.2.1.4, biological resources–related responses to comments in Chapter 8 of the Final SEIR, and all other biological resources–related evidence in the administrative record.

- 2. Significant Effect: Riparian Habitat and Other Sensitive Natural Communities.** Implementation of the project would have the potential to result in direct and indirect impacts on riparian habitat and other sensitive natural communities, which would be a potentially significant impact (Impact BI-2 and Impact BI-6).

Finding: Specific economic, legal, social, technological, or other considerations make infeasible the mitigation measures or project alternatives identified in the Final SEIR. Effects remain significant and unavoidable.

Mitigation Measures: No feasible mitigation beyond existing federal and state permitting requirements and compliance with the County's adopted 2011 GPU policies or 2011 GPU PEIR mitigation measures is available and could be applied to individual actions under the project.

Facts in Supporting Findings: The policy applicable to riparian habitat and other sensitive natural communities that was adopted as part of the 2011 GPU and is applicable

to the project is Policy COS-3.1. The mitigation measures applicable to riparian habitat and other sensitive natural communities that were adopted as a part of the 2011 GPU PEIR and are applicable to the project are Bio-1.1, Bio-1.2, Bio-1.3, Bio-1.4, Bio-1.5, Bio-1.6, Bio-1.7, Bio-2.1, Bio-2.2, Bio-2.3, and Bio-2.4.

Even with implementation of the 2011 GPU policy and 2011 GPU PEIR mitigation measures, because specific development projects that would be undertaken in Analysis Areas have not yet been identified, it is not possible to guarantee that all impacts on riparian habitat and other sensitive natural communities would be reduced to less than significant. No other feasible mitigation is available. For the reasons stated in Sections 2.4 and 4.2.1.4 of the Final SEIR, the direct and cumulative impacts would remain significant and unavoidable.

Reference: Final SEIR Sections 2.4 and 4.2.1.4, biological resources–related responses to comments in Chapter 8 of the Final SEIR, and all other biological resources–related evidence in the administrative record.

3. **Significant Effect: Wildlife Movement Corridors and Nursery Sites.** Implementation of the project would have the potential to impact wildlife movement corridors and nursery sites (Impact BI-4). Additionally, the project would result in a cumulatively considerable contribution to a significant cumulative impact associated with wildlife movement corridors and nursery sites (Impact BI-7).

Finding: Specific economic, legal, social, technological, or other considerations make infeasible the mitigation measures or project alternatives identified in the Final SEIR. Effects remain significant and unavoidable.

Mitigation Measures: No feasible mitigation beyond existing federal and state permitting requirements and compliance with the County’s adopted 2011 GPU policies or 2011 GPU PEIR mitigation measures is available and could be applied to individual actions under the project.

Facts in Supporting Findings: The policies applicable to wildlife movement corridors and nursery sites that were adopted as part of the 2011 GPU and are applicable to the project are Policies COS-1.1, COS-1.2, COS-1.3, COS-1.4, COS-1.5, LU-6.1, and LU-6.7. The mitigation measures applicable to wildlife movement corridors and nursery sites that were adopted as a part of the 2011 GPU PEIR and are applicable to the project are Bio-1.1, Bio-1.2, Bio-1.3, Bio-1.4, Bio-1.5, Bio-1.6, Bio-1.7, and Bio-2.3.

Even with implementation of the 2011 GPU policies and 2011 GPU PEIR mitigation measures, because specific development projects that would be undertaken in Analysis Areas have not yet been identified, it is not possible to guarantee that all impacts on wildlife movement corridors and nursery sites would be reduced to less than significant. No other feasible mitigation is available. For the reasons stated in Sections 2.4 and 4.2.1.4 of the Final SEIR, the direct and cumulative impacts would remain significant and unavoidable.

Reference: Final SEIR Sections 2.4 and 4.2.1.4, biological resources–related responses to comments in Chapter 8 of the Final SEIR, and all other biological resources–related evidence in the administrative record.

E. Hazards and Hazardous Materials

- 1. Significant Effect: Wildland Fires.** Increasing allowed densities and/or development intensities in existing Very High and High Fire Hazard Safety Zones (FHSZ) would increase the exposure of people or structures to significant risk associated with wildfire. Therefore, implementation of the project would result in a potentially significant impact from the exposure of 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 residents are intermixed with wildlands (Impact HZ-2). Implementation of the project would also result in increased development potential in areas that are prone to wildland fires. Thus, the project would result in a potentially significant impact from the exposure of or structures to a significant risk or loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residents are intermixed with wildlands. Therefore, the project's contribution to this significant cumulative impact would be cumulatively considerable (Impact HZ-3).

Finding: Specific economic, legal, social, technological, or other considerations make infeasible the mitigation measures or project alternatives identified in the Final SEIR. Effects remain significant and unavoidable.

Mitigation Measures: No feasible mitigation beyond existing federal and state permitting requirements and compliance with the County's adopted 2011 GPU policies or 2011 GPU PEIR mitigation measures is available and could be applied to individual actions under the project.

Facts in Supporting Findings: The policies applicable to wildland fire impacts that were adopted as part of the 2011 GPU and are applicable to the project are Policies COS-18.3, LU-6.11, LU-10.2, S-3.1, S-3.2, S-3.3, S-3.4, S-3.6, and S-4.1. The mitigation measures applicable to wildland fire impacts that were adopted as a part of the 2011 GPU PEIR and are applicable to the project are Haz-4.1, Haz-4.2, Haz-4.3, and Haz-4.4.

Even with implementation of 2011 GPU policies and 2011 GPU PEIR mitigation measures, because specific development projects that would be undertaken in Analysis Areas have not yet been identified, it is not possible to guarantee that all impacts associated with wildland fires would be reduced to less than significant. No other feasible mitigation is available. For the reasons stated in Sections 2.7 and 4.2.1.7 of the Final SEIR, the direct and cumulative impacts would remain significant and unavoidable.

Reference: Final SEIR Sections 2.7 and 4.2.1.7, hazards and hazardous materials–related responses to comments in Chapter 8 of the Final SEIR, and all other hazards and hazardous materials–related evidence in the administrative record.

F. Hydrology and Water Quality

- 1. Significant Effect: Water Quality Standards and Requirements.** The project would contribute to surface water quality contaminants and would place land uses in groundwater quality impaired areas resulting in a potentially significant direct impact on water quality standards and requirements (Impact HY-1). The project would contribute both non-point and point source pollutants in quantities that have the potential to violate water quality standards or waste discharge requirements. Therefore, the project, in combination with cumulative projects, would have the potential to result in a significant

cumulative impact associated with water quality standards and requirements (Impact HY-10).

Finding: Specific economic, legal, social, technological, or other considerations make infeasible the mitigation measures or project alternatives identified in the Final SEIR. Effects remain significant and unavoidable.

Mitigation Measures: No feasible mitigation beyond existing federal and state permitting requirements and compliance with the County's adopted 2011 GPU policies or 2011 GPU PEIR mitigation measures is available and could be applied to individual actions under the project.

Facts in Supporting Findings: The policies applicable to water quality standards and requirements that were adopted as part of the 2011 GPU and are applicable to the project are Policies COS-4.2, COS-4.3, COS-4.4, COS-5.2, COS-5.3, COS-5.5, LU-6.5, LU-6.9, LU-14.1, LU-14.2, LU-14.3, and LU-14.4. The mitigation measures applicable to water quality standards and requirements that were adopted as a part of the 2011 GPU PEIR and are applicable to the project are Hyd-1.1, Hyd-1.2, Hyd-1.3, Hyd-1.4, Hyd-1.5, Hyd-1.6, Hyd-1.7, Hyd-1.8, Hyd-1.9, and Hyd-1.10.

Even with implementation of 2011 GPU policies and 2011 GPU PEIR mitigation measures, because specific development projects that would be undertaken in Analysis Areas have not yet been identified, it is not possible to guarantee that all impacts associated with water quality standards and requirements would be reduced to less than significant. No other feasible mitigation is available. For the reasons stated in Sections 2.8 and 4.2.1.8 of the Final SEIR, the direct and cumulative impacts would remain significant and unavoidable.

Reference: Final SEIR Sections 2.8 and 4.2.1.8, hydrology and water quality–related responses to comments in Chapter 8 of the Final SEIR, and all other hydrology and water quality–related evidence in the administrative record.

2. **Significant Effect: Groundwater Supplies and Recharge.** Future development of land uses consistent with the project would increase groundwater demand and exacerbate the present unsustainable use of groundwater resources. Therefore, the project would result in a potentially significant impact on groundwater supplies and recharge (Impact HY-2). Additionally, the project, in combination with cumulative projects, would contribute to a significant cumulative impact associated with groundwater supplies and recharge (Impact HY-11).

Finding: Specific economic, legal, social, technological, or other considerations make infeasible the mitigation measures or project alternatives identified in the Final SEIR. Effects remain significant and unavoidable.

Mitigation Measures: No feasible mitigation beyond existing federal and state permitting requirements and compliance with the County's adopted 2011 GPU policies or 2011 GPU PEIR mitigation measures is available and could be applied to individual actions under the project.

Facts in Supporting Findings: The policies applicable to groundwater supplies and recharge that were adopted as part of the 2011 GPU and are applicable to the project are Policies COS-4.1, LU-8.1, LU-8.2, LU-13.1, and LU-13.2. The mitigation measures applicable to groundwater supplies and recharge that were adopted as a part of the 2011

GPU PEIR and are applicable to the project are Hyd-1.1, Hyd-1.2, Hyd-1.3, Hyd-1.4, Hyd-1.5, Hyd-2.1, Hyd-2.2, Hyd-2.3, Hyd-2.4, and Hyd-2.5.

Even with implementation of 2011 GPU policies and 2011 GPU PEIR mitigation measures, because specific development projects that would be undertaken in Analysis Areas have not yet been identified, it is not possible to guarantee that all impacts associated with groundwater supplies and recharge would be reduced to less than significant. No other feasible mitigation is available. For the reasons stated in Sections 2.8 and 4.2.1.8 of the Final SEIR, the direct and cumulative impacts would remain significant and unavoidable.

Reference: Final SEIR Sections 2.8 and 4.2.1.8, hydrology and water quality–related responses to comments in Chapter 8 of the Final SEIR, and all other hydrology and water quality–related evidence in the administrative record.

G. Land Use

Significant Effect: Conflicts with Land Use Plans, Policies, and Regulations. The project would have the potential to conflict with land use plans, policies, and regulations, specifically, with the San Diego Forward: The Regional Plan, the Regional Air Quality Standards (RAQS), and adopted General Plan and community plan policies (Impact LU-1). Additionally, the project would contribute to a potentially significant cumulative impact (Impact LU-2).

Finding: Specific economic, legal, social, technological, or other considerations make infeasible the mitigation measures or project alternatives identified in the Final SEIR. Effects remain significant and unavoidable.

Mitigation Measures:

PSR Mitigation Measures M-Air-1.1 and M-Air-1.2: See descriptions above.

PSR Mitigation Measure M-Pop-1.1: The County of San Diego shall provide to SANDAG a revised population, employment, and housing forecast that reflects the anticipated growth generated from the project.

Facts in Supporting Findings: The policies applicable to conflicts with Land Use plans, policies, and regulations that were adopted as part of the 2011 GPU and are applicable to the project are Policies LU-1.1, LU-1.2, LU-1.3, LU-1.7, LU-4.1, and LU-5.3. The mitigation measures applicable to conflicts with land use plans, policies, and regulations that were adopted as a part of the 2011 GPU PEIR and are applicable to the project are Aes-1.1 through Aes-1.11, Aes-3.1, Aes-3.2, Agr-1.1 through Agr-1.5, Agr-2.1, Air-2.5 through Air-2.9, Bio-1.1 through Bio-1.7, Haz-4.1 through Haz-4.4, Hyd-1.1 through Hyd-1.5, Hyd-2.1 through Hyd-2.5, Hyd-4.1 through Hyd-4.3, Hyd-6.1, Hyd-8.1, Hyd-8.2, Pub-1.1 through Pub-1.9, USS-2.1 through USS-2.3, USS-4.1 through USS-4.7. Additional mitigation measures are M-Air-1.1, M-Air-1.2, and M-Pop-1.1.

Even with implementation of 2011 GPU policies and 2011 GPU PEIR mitigation measures, and additional mitigation measures M-Air-1.1, M-Air-1.2, and M-Pop-1.1, because specific development projects that would be undertaken in Analysis Areas have not yet been identified, it is not possible to guarantee that all conflicts with land use plans, policies, and regulations impacts would be reduced to less than significant. No other feasible mitigation

is available. For the reasons stated in Sections 2.9 and 4.2.1.9 of the Final SEIR, the direct and cumulative impacts would remain significant and unavoidable.

Reference: Final SEIR Sections 2.9 and 4.2.1.9, land use–related responses to comments in Chapter 8 of the Final SEIR, and all other land use–related evidence in the administrative record.

H. Mineral Resources

- 1. Significant Effect: Mineral Resource Availability.** Proposed land use changes would reduce the availability of mineral resources. Despite applying federal, State, and local regulations, the impacts of the project would remain significant. The project would result in a potentially significant impact regarding mineral resource availability (Impact MR-1). Additionally, the project, in combination with other cumulative projects, would result in a cumulatively considerable contribution to a regionally significant impact related to the loss of availability of known mineral resources (Impact MR-3).

Finding: Specific economic, legal, social, technological, or other considerations make infeasible the mitigation measures or project alternatives identified in the Final SEIR. Effects remain significant and unavoidable.

Mitigation Measures: No feasible mitigation beyond existing federal and state permitting requirements and compliance with the County’s adopted 2011 GPU policies or 2011 GPU PEIR mitigation measures is available and could be applied to individual actions under the project.

Facts in Supporting Findings: The policies applicable to mineral resource availability that were adopted as part of the 2011 GPU and are applicable to the project are Policies COS-10.1, COS-10.2, COS-10.3, COS-10.4, COS-10.6, COS-10.8, and COS-10.9. The mitigation measures applicable to mineral resource availability that were adopted as a part of the 2011 GPU PEIR and are applicable to the project are Min-1.1, Min-1.2, and Min-1.3.

Even with implementation of 2011 GPU policies and 2011 GPU PEIR mitigation measures, because specific development projects that would be undertaken in Analysis Areas have not yet been identified, it is not possible to guarantee that all impacts associated with mineral resource availability would be reduced to less than significant. No other feasible mitigation is available. For the reasons stated in Sections 2.10 and 4.2.1.10 of the Final SEIR, the direct and cumulative impacts would remain significant and unavoidable.

Reference: Final SEIR Sections 2.10 and 4.2.1.10, mineral resources–related responses to comments in Chapter 8 of the Final SEIR, and all other mineral resources–related evidence in the administrative record.

I. Noise

- 1. Significant Effect: Permanent Increase in Ambient Noise Level.** The project would cause direct and cumulative impacts related to a permanent increase in ambient noise levels from roadways, and commercial and industrial activities, which would be potentially significant (Impact NO-3 and Impact NO-6).

Finding: Specific economic, legal, social, technological, or other considerations make infeasible the mitigation measures or project alternatives identified in the Final SEIR. Effects remain significant and unavoidable.

Mitigation Measures: No feasible mitigation beyond existing federal and state permitting requirements and compliance with the County's adopted 2011 GPU policies or 2011 GPU PEIR mitigation measures is available and could be applied to individual actions under the project.

Facts in Supporting Findings: The policies applicable to impacts associated with a permanent increase in ambient noise level that were adopted as part of the 2011 GPU and are applicable to the project are Policies LU-2.8, M-1.3, M-2.4, N-1.5, N-4.1, N-4.2, N-5.1, N-5.2, N-6.1, N-6.2, N-6.3, N-6.4, and N-6.6. The mitigation measures applicable to impacts associated with a permanent increase in ambient noise level that were adopted as a part of the 2011 GPU PEIR and are applicable to the project are Noi-1.3, Noi-1.4, Noi-1.5, Noi-1.8, Noi-2.3, Noi-2.4, Noi-3.1, and Noi-3.2.

Even with implementation of 2011 GPU policies and 2011 GPU PEIR mitigation measures, because specific development projects that would be undertaken in Analysis Areas have not yet been identified, it is not possible to guarantee that all impacts associated with a permanent increase in ambient noise level would be reduced to less than significant. No other feasible mitigation is available. For the reasons stated in Sections 2.11 and 4.2.1.11 of the Final SEIR, the direct and cumulative impacts would remain significant and unavoidable.

Reference: Final SEIR Sections 2.11 and 4.2.1.11, noise-related responses to comments in Chapter 8 of the Final SEIR, and all other noise-related evidence in the administrative record.

J. Population and Housing

- 1. Significant Effect: Population Growth.** Implementation of the project would result in a less-than-significant impact on an increase in population growth, because it would not directly result in substantial population growth that is inconsistent with forecasted regional population estimates. However, the project, in combination with other cumulative projects, including development projects that require a General Plan Amendment to increase the allowable number of dwelling units, would result in a cumulatively considerable contribution to a regionally significant impact associated with substantial increases in population growth (Impact PH-1).

Finding: Specific economic, legal, social, technological, or other considerations make infeasible the mitigation measures or project alternatives identified in the Final SEIR. Effects remain significant and unavoidable.

Mitigation Measure:

PSR Mitigation Measure M-Pop-1.1: See description above.

Facts in Supporting Findings: The policies applicable to impacts associated with population growth that were adopted as part of the 2011 GPU and are applicable to the

project are Policies LU-1.4, LU-9.4, and LU-14.4. The mitigation measure applicable to impacts of the project associated with population growth is M-Pop-1.1.

Even with implementation of 2011 GPU policies and the additional mitigation measure, because specific development projects that would be undertaken in Analysis Areas have not yet been identified, it is not possible to guarantee that all impacts associated with population growth would be reduced to less than significant. No other feasible mitigation is available. For the reasons stated in Sections 2.12 and 4.2.1.12 of the Final SEIR, the cumulative impacts would remain significant and unavoidable.

Reference: Final SEIR Sections 2.12 and 4.2.1.12, population and housing–related responses to comments in Chapter 8 of the Final SEIR, and all other population and housing–related evidence in the administrative record.

K. Public Services

- 1. Significant Effect: School Services.** The project includes land use changes that would increase residential densities. The projected population and housing growth associated with the project would result in an increase in student enrollment, including the potential need for new or expanded school facilities, the construction and operation of which could have significant effects on the environment. Therefore, the project would result in a potentially significant impact associated with the construction or expansion of school facilities (Impact PS-3). Additionally, the project, in combination with the identified cumulative projects, would result in a cumulatively considerable contribution to a significant cumulative impact associated with school facilities (Impact PS-7).

Finding: Specific economic, legal, social, technological, or other considerations make infeasible the mitigation measures or project alternatives identified in the Final SEIR. Effects remain significant and unavoidable.

Mitigation Measures: No feasible mitigation beyond existing federal and state permitting requirements and compliance with the County’s adopted 2011 GPU policies or 2011 GPU PEIR mitigation measures is available and could be applied to individual actions under the project.

Facts in Supporting Findings: The policies applicable to impacts associated with school services that were adopted as part of the 2011 GPU and are applicable to the project are Policies LU-1.4, LU-9.7, LU-12.3, LU-12.4, LU-17.1, LU-17.2, LU-17.3, LU-17.4, and LU-18.2. The mitigation measures applicable to impacts associated with school services that were adopted as a part of the 2011 GPU PEIR and are applicable to the project are Pub-1.1, Pub-1.2, Pub-1.3, Pub-3.1, and Pub-3.2.

Even with implementation of 2011 GPU policies and 2011 GPU PEIR mitigation measures, because specific development projects that would be undertaken in Analysis Areas have not yet been identified, it is not possible to guarantee that all impacts associated with school services would be reduced to less than significant. No other feasible mitigation is available. For the reasons stated in Sections 2.13 and 4.2.1.13 of the Final SEIR, the direct and cumulative impacts would remain significant and unavoidable.

Reference: Final SEIR Sections 2.13 and 4.2.1.13, public services–related responses to comments in Chapter 8 of the Final SEIR, and all other public services–related evidence in the administrative record.

L. Transportation and Traffic

1. Significant Effect: Unincorporated County Traffic and Level of Service Standards.

The project would be required to comply with applicable federal, State, and local regulations, which would reduce the potential for additional impacts. However, implementation of the project would result in a potentially significant impact to traffic by exceeding a level of service (LOS) threshold established by the County (Impact TR-1). Additionally, the project, in combination with cumulative projects, would have the potential to result in a significant cumulative impact associated with traffic in excess of LOS standards, and thus the project’s contribution would be cumulatively considerable (Impact TR-5).

Finding: Specific economic, legal, social, technological, or other considerations make infeasible the mitigation measures or project alternatives identified in the Final SEIR. Effects remain significant and unavoidable.

Mitigation Measures: No feasible mitigation beyond existing federal and state permitting requirements and compliance with the County’s adopted 2011 GPU policies or 2011 GPU PEIR mitigation measures is available and could be applied to individual actions under the project.

Facts in Supporting Findings: The policies applicable to impacts associated with unincorporated County traffic and level of service standards that were adopted as part of the 2011 GPU and are applicable to the project are Policies LU-5.1, LU-10.4, LU-11.8, LU-12.2, M-1.1, M-1.2, M-1.3, M-2.1, M-2.2, M-2.3, M-3.1, M-3.2, M-4.2, M-5.1, M-5.2, M-9.1, and M-9.2. The mitigation measures applicable to impacts associated with unincorporated County traffic and level of service standards that were adopted as a part of the 2011 GPU PEIR and are applicable to the project are Tra-1.1 and Tra-1.3 through Tra-1.7.

Even with implementation of 2011 GPU policies and 2011 GPU PEIR mitigation measures, because specific development projects that would be undertaken in Analysis Areas have not yet been identified, it is not possible to guarantee that all impacts associated with unincorporated County traffic and level of service standards would be reduced to less than significant. No other feasible mitigation is available. For the reasons stated in Sections 2.15 and 4.2.1.15 of the Final SEIR, the direct and cumulative impacts would remain significant and unavoidable.

Reference: Final SEIR Sections 2.15 and 4.2.1.15, transportation and traffic–related responses to comments in Chapter 8 of the Final SEIR, and all other transportation and traffic–related evidence in the administrative record.

2. Significant Effect: Road Safety. Implementation of the project would result in a potentially significant impact on transportation hazards due to design features (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment) (Impact TR-2). Additionally, the project, in combination with cumulative projects, would contribute

to a significant cumulative impact as a result of increased hazards due to a design feature or incompatible use (Impact TR-6).

Finding: Specific economic, legal, social, technological, or other considerations make infeasible the mitigation measures or project alternatives identified in the Final SEIR. Effects remain significant and unavoidable.

Mitigation Measures: No feasible mitigation beyond existing federal and state permitting requirements and compliance with the County's adopted 2011 GPU policies or 2011 GPU PEIR mitigation measures is available and could be applied to individual actions under the project.

Facts in Supporting Findings: The policies applicable to impacts associated with road safety that were adopted as part of the 2011 GPU and are applicable to the project are Policies LU-2.8, LU-6.10, M-4.3, M-4.4, M-4.5, and M-9.1. The mitigation measures applicable to impacts associated with road safety that were adopted as a part of the 2011 GPU PEIR and are applicable to the project are Tra-1.2, Tra-1.3, Tra-1.4, and Tra-1.7.

Even with implementation of 2011 GPU policies and 2011 GPU PEIR mitigation measures, because specific development projects that would be undertaken in Analysis Areas have not yet been identified, it is not possible to guarantee that all impacts associated with road safety would be reduced to less than significant. No other feasible mitigation is available. For the reasons stated in Sections 2.15 and 4.2.1.15 of the Final SEIR, the direct and cumulative impacts would remain significant and unavoidable.

Reference: Final SEIR Sections 2.15 and 4.2.1.15, transportation and traffic-related responses to comments in Chapter 8 of the Final SEIR, and all other transportation and traffic-related evidence in the administrative record.

M. Utilities and Service Systems

- 1. Significant Effect: Adequate Water Supplies.** Implementation of the project would have a significant impact on areas serviced by groundwater-dependent districts. The project would exceed existing entitlements for water and would result in a potentially significant impact; therefore, the project would result in a significant impact related to adequate water supplies (Impact UT-4). The project has the potential to result in water demand that exceeds surface water and groundwater availability. Therefore, the project, in combination with the identified cumulative projects, would have the potential to result in a significant cumulative impact (Impact UT-6).

Finding: Specific economic, legal, social, technological, or other considerations make infeasible the mitigation measures or project alternatives identified in the Final SEIR. Effects remain significant and unavoidable.

Mitigation Measures: No feasible mitigation beyond existing federal and state permitting requirements and compliance with the County's adopted 2011 GPU policies or 2011 GPU PEIR mitigation measures is available and could be applied to individual actions under the project.

Facts in Supporting Findings: The policies applicable to impacts associated with adequate water supplies that were adopted as part of the 2011 GPU and are applicable

to the project are Policies COS-4.1, COS-4.2, COS-4.3, COS-4.4, COS-5.2, COS-5.5, LU-8.1, LU-8.2, LU-13.1, and LU-13.2. The mitigation measures applicable to impacts associated with adequate water supplies that were adopted as a part of the 2011 GPU PEIR and are applicable to the project are USS-4.1, USS-4.2, USS-4.3, USS-4.4, USS-4.5, USS-4.6, and USS-4.7.

Even with implementation of 2011 GPU policies and 2011 GPU PEIR mitigation measures, because specific development projects that would be undertaken in Analysis Areas have not yet been identified, it is not possible to guarantee that all impacts associated with adequate water supplies would be reduced to less than significant. No other feasible mitigation is available. For the reasons stated in Sections 2.16 and 4.2.1.16 of the Final SEIR, the direct and cumulative impacts would remain significant and unavoidable.

Reference: Final SEIR Sections 2.16 and 4.2.1.16, utilities and service systems–related responses to comments in Chapter 8 of the Final SEIR, and all other utilities and service systems–related evidence in the administrative record.

IV. FINDINGS REGARDING SPECIFIC MITIGATION MEASURES

The Final SEIR identifies mitigation measures that the County has determined to be infeasible as listed below.

- As discussed in Section 2.1.5.3 of the Final SEIR, other mitigation was considered to reduce aesthetics impacts related to visual character or quality (AE-3 and AE-7) but was ultimately determined to be infeasible. These infeasible mitigation measures included: Requiring revised goals and policies to be prepared and incorporated into community plans that would severely limit the potential for development growth in order to maintain the existing visual character or quality of each community; comprehensively expand the Zoning Ordinance to specifically dictate the exact development type and design allowed in the various areas of the County to avoid impacts to community character; and approving only development that is comparable in size, scope, and use as existing development in order to avoid impacts to the visual character and quality of the County’s communities.
- As discussed in Section 2.3.5.4 of the Final SEIR, other mitigation was considered to reduce air quality impacts related to sensitive receptors (AQ-4 and AQ-8) but was ultimately determined to be infeasible. These infeasible mitigation measures included: requiring that all off-road or non-road diesel engines, such as those associated with construction or extraction operations, be replaced by an alternative power source, such as electricity; and requiring all diesel trucks that travel on County roads to be equipped with filters or other devices that would limit diesel emissions to below a significant level.
- As discussed in Section 2.4.5.1 of the Final SEIR, other mitigation was considered to reduce biological resources impacts related to special status plant and wildlife species (BI-1 and BI-5) but was ultimately determined to be infeasible. This infeasible mitigation measure was adoption of MSCP Plans for North County and East County that provide coverage for special status species as well as protections for wildlife corridors, habitat linkages, and core habitat areas in those regions.
- As discussed in Section 2.8.5.2 of the Final SEIR, other mitigation was considered to reduce hydrology and water quality impacts related to groundwater supplies and recharge (HY-2 and HY-11) but was ultimately determined to be infeasible. These infeasible

mitigation measures included: in areas with potentially impacted groundwater supplies, require all proposed discretionary projects to share well water through a well sharing agreement; in areas with inadequate groundwater supply, project proponents shall be required to secure water contracts with other groundwater providers to import water through the construction of new infrastructure from another groundwater basin that is not impacted, prior to the issuance of discretionary permits; in groundwater dependent areas with inadequate groundwater supply, project proponents shall be required to secure water contracts with other water providers to truck in water from local water districts or other sources such as an off-site well, prior to the issuance of discretionary permits; in groundwater dependent areas with inadequate groundwater supply, project proponents shall be required to secure water contracts with the SDCWA in order to import water from SDCWA facilities; and implement a Countywide moratorium on building permits and development applications in any areas of the County that would have the potential to adversely impact groundwater supplies and recharge.

- As discussed in Section 2.10.5.1 of the Final SEIR, other mitigation was considered to reduce mineral resource impacts related to mineral resource availability (MR-1 and MR-3) but was ultimately determined to be infeasible. These infeasible mitigation measures included: prohibit incompatible uses that would be located on or near significant mineral resource sites; for projects that propose incompatible uses near significant mineral resource sites, require the applicants to mine the site prior to project development; and use public funds to initiate new mineral extraction operations.
- As discussed in Section 2.16.5.4 of the Final SEIR, other mitigation was considered to reduce utilities and service systems impacts regarding adequate water supplies (UT-4 and UT-6) but was ultimately determined to be infeasible. These infeasible mitigation measures included measures as described in Section 2.8.6.2 of the 2011 PEIR, and implementation of a moratorium on building permits and development applications in any areas of the County that would have an inadequate imported water supply to serve future development until adequate water supplies are procured.

All mitigation measures identified in the Final SEIR are feasible and will be adopted.

During public review of the Draft SEIR, three alternative mitigation measures were suggested for implementation to reduce impacts identified as significant, however as discussed in the response to comments these alternative mitigation measures were determined to be infeasible or inapplicable to the project. One of the suggested measures was to place on-site agricultural lands into the PACE Program; thereby, increasing the total number of acres as agricultural easements. While several discretionary permit applicants have elected to use the PACE Program to mitigate significant impacts to agricultural lands, there is no County requirement to use the PACE Program to mitigate significant impacts to agricultural resources. Even with mitigation measures such as the County's PACE Program, impacts would not be reduced to a level that is below significant as there is no CEQA requirement for a jurisdiction to require agricultural easements to mitigate potentially significant impacts to agricultural resources.. Therefore, this measure is considered infeasible, and impacts would remain significant and unavoidable.

Another suggestion was to provide a mitigation measure that directs growth to the 18 municipalities where jobs and other services are located, and evaluate alternative mitigation such as a measure for the County to contribute its share to the regional transit district or provide transit subsidies. A measure to direct growth to the 18 incorporated municipalities is outside the scope

of the Proposed Project. The Proposed Project is related to changing to land use designations and allowed densities of development in the unincorporated County. The County does not have land use jurisdiction in the incorporated municipalities and must provide for appropriate development including housing in the unincorporated area pursuant to State requirements. A mitigation measure regarding transit subsidies as suggested by the commenter would not be equitable for other residents within the County's jurisdiction. Furthermore, the suggested mitigation measure is unenforceable as the County cannot require future residents to utilize public transit, even if those services are available near future development project sites. Therefore, this measure is considered infeasible, and impacts would remain significant and unavoidable.

The third suggested mitigation measure was to incorporate the mitigation measures provided in the County's 2008 Interim Guidelines for Determining Significance into the SEIR to reduce project impacts. The County acknowledges the guidelines and mitigation suggestions provided within them; however, these measures have been supplanted by the Consistency Review Checklist in the County's approved Climate Action Plan. Future discretionary projects such as those that might result from the Proposed Project would be required to implement measures contained in the Consistency Review Checklist as applicable..

Except for those mitigation measures set forth in the adopted Mitigation Monitoring and Reporting Program, discussed in the Final SEIR, and explained in these findings, the County of San Diego finds that there are no other feasible mitigation measures that would substantially lessen or avoid any significant effect that the project would have on the environment.

V. FINDINGS REGARDING ALTERNATIVES

Section 15126.6(a) of the State CEQA Guidelines requires the discussion of "a reasonable range of alternatives to a project, or the location of a project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives." Section 15126.6(f) further states that the "range of alternatives in an EIR is necessary to permit a reasoned choice." Thus, the following discussion focuses on project alternatives that can eliminate significant environmental impacts or substantially reduce them as compared to the Staff Recommended Project, even if the alternative would impede the attainment of some project objectives or would be costlier. Consistent with the California Supreme Court Ruling in *In re Bay-Delta Programmatic Environmental Impact Report Coordinated Proceedings*, however, the County's analysis of alternatives is limited to the consideration of projects that could achieve the project's fundamental project objectives. (*In re Bay-Delta*, 43 Cal.4th 1143, 1165 "an EIR need not study in detail an alternative that is infeasible or that the lead agency has reasonable determined cannot achieve the project's underlying fundamental purpose."; see also, *San Diego Citizenry Group v. County of San Diego* (2013) 219 Cal. App. 4th 1, 14.)

Four alternatives were analyzed in the Final SEIR, including the No Project Alternative, PSR Reduced Density Alternative, SD15 2012 Board Letter Alternative, and the Champagne Gardens Environmentally Superior Alternative. A comparison of those alternatives is presented in Table 1 below. No feasible alternatives were identified for the revision to the Valley Center Community Plan Residential Policy 8. The revision to Policy 8 would be environmentally superior to the No Project Alternative for that component of the overall project, as the revision would allow for placing development away from sensitive habitats, agricultural lands, and other resources, in addition to reducing the need for infrastructure expansion. The revision would have the effect of reducing the development footprint in applicable areas, and would not change allowed residential density.

A combination of the Proposed Project, Reduced Density Alternatives, and No Project alternatives will be presented to the decision makers for adoption as the Staff Recommended Project. Analysis of all components of the Staff Recommended Project is contained in the Final SEIR and is the project being recommended for approval by staff based on consideration of the alternatives, project objectives, project benefits, General Plan and community plan policy consistency issues, environmental impacts, availability of infrastructure and services, stakeholder input, and numerous other factors. In addition, a number of alternatives were considered and rejected, as described in Section 4.2 of the Final SEIR, pursuant to State CEQA Guidelines Section 15126.6(c).

These findings contrast and compare the alternatives where appropriate to demonstrate that the selection of the Staff Recommended Project, while still causing certain unavoidable significant environmental impacts, would result in substantial environmental, planning, public safety, economic, and other benefits. In rejecting the balance of the alternatives that were analyzed in the Final SEIR, the County of San Diego has examined the project objectives and weighed the ability of each of the various alternatives to meet the objectives. The County finds that the Staff Recommended Project best meets the project objectives with the least environmental impact. The objectives that were adopted by the County are the same as the Guiding Principles of the General Plan. These objectives set the framework for the project, and read as follows:

- 1) Support a reasonable share of projected regional population growth.
- 2) Promote sustainability by locating new development near existing infrastructure, services, and jobs.
- 3) Reinforce the vitality, local economy, and individual character of existing communities while balancing housing, employment, and recreational opportunities.
- 4) Promote environmental stewardship that protects the range of natural resources and habitats that uniquely define the County's character and ecological importance.
- 5) Ensure that development accounts for physical constraints and the natural hazards of the land.
- 6) Provide and support a multi-modal transportation network that enhances connectivity and supports community development patterns.
- 7) Maintain environmentally sustainable communities and reduce greenhouse gas emissions that contribute to climate change.
- 8) Preserve agriculture as an integral component of the region's economy, character, and open space network.
- 9) Minimize public costs of infrastructure and services and correlate their timing with new development.
- 10) Recognize community and stakeholder interests while striving for consensus.

The following provides a summary of each component of the Staff Recommended Project including the Revision to Valley Center Community Plan Residential Policy 8. Each alternative is

fully analyzed in Chapter 4 of the Final SEIR. The summary includes rationale as to why each component of the Staff Recommended Project is preferred over the Proposed Project and other alternatives as necessary, and why other alternative or Proposed Project components have been rejected.

Staff Recommended Project

Description

The Staff Recommended Project consists of the Proposed Project for PSR Analysis Areas FB19+, ME26, NC3A, SD15, Western Champagne Gardens (the Proposed Map is the same as the Alternative Map for this Analysis Area), and the revision to Valley Center Residential Policy 8; the Reduced Density Alternative for PSR Analysis Areas BO18+, CD14, FB2+, FB17, ME30A, NC18A, NC37, NC38+, PP30, VC7+, VC51, VC57+, and Eastern Champagne Gardens; and the No Project Alternative for PSR Analysis Areas DS8, DS24, FB21+, NC22, and VC67. Each of the Staff Recommended Project components are described and analyzed in Chapters 1 through 4 of the SEIR as applicable.

The No Project Alternative for the Staff Recommended Project components and all Analysis Areas, assumes maintaining the existing General Plan land use designations which were adopted in 2011 (see Section 4.3 of the SEIR). It assumes the existing General Plan and Zoning Ordinance would continue to guide development in unincorporated areas of the County through the forecasted buildout year of 2050. For the former CGSP Subarea, the No Project Alternative would mean only one potential dwelling unit on CG7 (Subarea 7; RL-20 existing) as the other areas are currently designated Specific Plan Area, with a zero density on the Land Use Map. Uses would be limited to the few that can be allowed in the S88 zone, except residential.

The No Project Alternative for Valley Center Community Plan Residential Policy 8 means the Policy would not be revised to allow for more clustering flexibility in allowed zoning minimum lot sizes.

Findings

BO18+: The Reduced Density Alternative Map is included in the Staff Recommended Project.

Facts in Support of the Finding:

The Reduced Density Alternative Map would result in a reduction of potential environmental impacts in comparison to the Proposed Project Map, and more readily meet project objectives when compared to the Proposed Project Map and the No Project Map.

The BO18+ Analysis Area includes five PSRs and a large Study Area, all in the northeastern portion of the Bonsall CPA. The Proposed Project Map was found to be inconsistent with General Plan Policies LU-6.11 and S-1.1 which deal with land use mapping to minimize exposure to hazards, particularly fire hazards. The Proposed Project Map was also found to be inconsistent with Policy LU-1.1, focused on the Community Development Model and directing density toward existing infrastructure and services. The southern and western portions of the Analysis Area contain steep slopes of habitat constraints, in addition to multiple dead end roads and roads not built to fire access standards. Some of these existing substandard access roads have steep

drop offs on one side and the feasibility of improvements to fire access standards is questionable. The northeastern portion of the Analysis Area is the only portion adjacent to a public road, has multiple roads currently built to fire access standards, is ¼ mile from an I-15 on-ramp, and has very little steep slope or habitat constraints. The only portion that would change in the Reduced Density Alternative Map is this northeastern portion. No General Plan inconsistencies have been found with this Reduced Density Alternative Map, and that is the staff recommendation.

CD14: The Reduced Density Alternative Map is included in the Staff Recommended Project.

Facts in Support of the Finding:

The Reduced Density Alternative Map would result in a reduction of potential environmental impacts in comparison to the Proposed Project Map, and more readily meet project objectives when compared to the Proposed Project Map and No Project Map.

The CD14 Analysis Area just includes one PSR with no Study Area, in the western portion of the Crest-Dehesa CPA. The Reduced Density Alternative Map reduces the area of SR-2 in more constrained portions of the site, including part of a ridgeline and a drainage area, and further consolidates the SR-2 closer to the existing built out neighborhood to the west; thus demonstrating a higher level of consistency with policies that address sensitive habitat areas and ridgelines. However, the only policy inconsistency found with the Proposed Project Map was for LU-1.9, which addresses feasibility of reaching the General Plan density potential. The site has an existing special zoning designator, which limits grading and septic placement; it is in an adopted Pre-Approved Mitigation Area (PAMA) of the South County MSCP, which will require consolidating development in the southwest corner to maximize open space and wildlife corridors; and meeting fire access requirements will be difficult and also necessitate consolidating homes in the southwest corner. With the lack of sewer service and limitations on septic placement options, the estimated 14-lot Reduced Density Alternative Map provides greater assurance of feasibility, better addresses constraints and applicable policies, and that is the staff recommendation.

DS8: The No Project Alternative Map is included in the Staff Recommended Project.

Facts in Support of the Finding:

The Proposed Project Map and Reduced Density Alternative Map have been rejected because they would result in substantially greater environmental impacts when compared to the No Project Alternative (included in the Staff Recommended Project). The No Project Alternative Map would more readily meet project objectives when compared to the Proposed Project Map and the No Project Map.

The DS8 Analysis Area includes one PSR and two Study Area parcels in the central portion of the Borrego Springs CPA. Both the Proposed Project Map and Reduced Density Alternative Map were found to be inconsistent six applicable policies of the General Plan. The most daunting issue facing development in the Borrego Valley is the implications of the Sustainable Groundwater Management Act (SGMA) and

upcoming Groundwater Sustainability Plan (GSP), which will require drastic reductions in water use in the Valley, bringing into question the ability of the Borrego Water District (BWD) to service the density potential. Both the current Community Plan and the community-specific mapping objectives of the General Plan Update recognized the prevalence of vacant lots and existing unbuilt density in the community. It is estimated that over 10,000 additional dwelling units are possible when adding legally buildable vacant lots to the additional subdivision/multi-family potential in the current General Plan. From the hazards and feasibility perspective, the Analysis Area is mostly within a fan terminus alluvial wash (FTAW), which is a particularly hazardous area of the floodplain that can concentrate flows during flash floods, and carries restrictive requirements that will limit feasibility. Considering the feasibility issues, policy inconsistencies, and level of potential environmental impacts associated with both the Proposed Project Map and the Reduced Density Alternative Map, the staff recommendation is the No Project Alternative Map.

DS24: The No Project Alternative Map is included in the Staff Recommended Project.

Facts in Support of the Finding:

The Proposed Project Map and Reduced Density Alternative Map have been rejected because they would result in substantially greater environmental impacts when compared to the No Project Alternative Map (Staff Recommended Project). The No Project Alternative Map would more readily meet project objectives when compared to the Proposed Project Map and the No Project Map.

The DS24 Analysis Area includes one PSR and no Study Area in the western portion of the Borrego Springs CPA. The Proposed Project Map was found to be inconsistent with seven policies of the General Plan and three policies of the Community Plan, and these inconsistencies would also carry forward for the Alternative Map, with the exception of two of the General Plan policies. The issues of groundwater sustainability, excessive unbuilt available density, and flood hazards, discussed in the rationale for DS8, would also apply to DS24. In addition, DS24 contains one of the densest concentrations of ocotillos in the Borrego Valley. The high quality native desert habitat has the potential to host several sensitive species, and the Community Plan calls for directing new development toward previously cleared sites. The site makes up a key component of a scenic view shed seen from the main southern community entry point, Borrego Springs Road, and the main western entry point, Montezuma Valley Road, a County Scenic Highway. The nearby areas of SR-1, SR-2, and VR-2 designations are already parcelized to those densities, and the majority of these nearby lots are vacant, though the lots are currently adjacent to public roads and water lines. Considering the feasibility issues, policy inconsistencies, and level of potential environmental impacts associated with both the Proposed Project Map and the Reduced Density Alternative Map, the staff recommendation is the No Project Alternative Map.

FB2+: The Reduced Density Alternative Map is included in the Staff Recommended Project.

Facts in Support of the Finding:

The Reduced Density Alternative Map would result in a reduction of potential

environmental impacts in comparison to the Proposed Project Map, and more readily meet project objectives when compared to the Proposed Project Map and the No Project Map.

The FB2+ Analysis Area includes two PSRs (under the same ownership) and a Study Area in the eastern portion of the Fallbrook CPA. The Proposed Project Map was found to be inconsistent with six policies of the General Plan. No inconsistencies were found for the Alternative Map. The problematic component of the Proposed Project Map is the SR-4 proposed for the western portion. This portion is on a hillside of mostly coastal sage scrub. It makes up an important link in a wildlife corridor (draft NCMSCP PAMA), as it is adjacent to over 1,000 acres of native habitat to the north and west, with the majority of this adjacent acreages in preserves. The SR-4 would not fit the current mapping pattern of the area with over 20,000 acres of surrounding Rural Lands, including over 3,000 acres of Williamson Act contract properties to the south, forming a “greenbelt” community buffer (per the General Plan definition) at the edge of the community. The Analysis Area is separated from higher density Specific Plan areas near the I-15/SR-76 interchange by a mountainous area of habitat preserves and agricultural preserves. The Reduced Density Alternative Map would apply RL-20 throughout the Analysis Area, which would provide consistency with applicable policies, would reduce impacts, and is the staff recommendation.

FB17: The Reduced Density Alternative Map is included in the Staff Recommended Project.

Facts in Support of the Finding:

The Reduced Density Alternative would result in a reduction of potential environmental impacts in comparison to the Proposed Project Map, and more readily meet project objectives when compared to the Proposed Project Map and the No Project Map.

FB17 includes one PSR with no Study Area in the eastern portion of the Fallbrook CPA. The Proposed Project Map presents inconsistency issues with four policies of the General, with the inconsistencies mainly related to feasibility and land use mapping with consideration of sensitive habitats and agricultural preservation. The central portion of FB17 contains areas of estimated wetlands along the public road frontage and crossing diagonally across the area. Outside of the wetlands are some areas of steep slopes and coastal sage scrub. As the site is not within a sewer service area, these constraints will present challenges in reaching the density potential. As discussed in the General Plan Conformance portion of the Land Use section of the SEIR, research (unincorporated County focused) shows the difficulties in supporting agricultural preservation as large agricultural areas increase densities to SR-1 and higher. The Reduced Density Alternative Map would consolidate the change to SR-1 in approximately 27 acres located in the less constrained eastern leg of the Analysis Area, with better access options. This option was found to be consistent with all of the applicable General Plan policies, would provide greater assurance of feasibility, would reduce impacts, and is the staff recommendation.

FB19+: The Proposed Project Map is included in the Staff Recommended Project.

Facts in Support of the Finding:

The Proposed Project Map for the FB19+ Analysis Area would be estimated to only allow for one additional potential dwelling unit and was determined to not have any conflicts with General Plan Policies and Guiding Principles (project objectives).

There is no feasible Reduced Density Alternative Map for this PSR Analysis Area (see Section 4.1 of the Final SEIR).

The FB19+ Analysis Area proposal would constitute a negligible change for the large area covered. The proposed SR-10 designation allows the same density (1 unit per 20 acres) as the existing RL-20 in areas of 25% and greater slope and most of the area consists of steep slopes. There are 61 parcels in the Analysis Area now. A GIS slope model was used for slope-dependent density calculations, and with the existing parcel sizes, estimates show only one of the existing lots would potentially be able to subdivide into two lots under SR-10. With the 1-unit difference between Existing and Proposed, there would not be anticipated impacts to the character of the area. There are existing areas of SR-4 and SR-10 adjacent to the west and south, and another large area of SR-10 nearby to the east, so such a change would also not be out of line with mapping patterns. The Proposed Project Map is the staff recommendation.

FB21+: The No Project Alternative is included in the Staff Recommended Project.

Facts in Support of the Finding:

The Proposed Project and Reduced Density Alternative Map have been rejected because they would result in substantially greater environmental impacts when compared to the No Project Alternative (Staff Recommended Project). The No Project Alternative would more readily meet project objectives when compared to the Proposed Project Map and the No Project Map.

The FB21+ Analysis Area includes three PSRs and a Study Area at the northern edge of the Fallbrook CPA, adjacent to Riverside County. The Proposed Project Map has been found to be inconsistent with 11 General Plan policies. The Analysis Area is highly constrained by Sandia Creek (Santa Margarita River tributary), tributary wetlands, steep slopes, and native upland habitats, with the most constrained portions being the western PSRs in the Analysis Area with the bulk of the additional density potential. There is minimal developable areas on these western portion properties when considering wetlands, wetland buffers, and 10% RPO slope encroachment allowance. There is a high probability of sensitive species occurring in the Analysis Area, particularly riparian species. Public roads are not available in the Analysis Area, and the main private access road through the middle (Sandia Creek Drive) contains sharp curves and steep roadside drop offs where it traverses steep slopes. One of the community-specific planning rationales for Fallbrook during the General Plan Update was to maintain Rural Lands designations in the environmentally sensitive areas near the Santa Margarita River. All private lands north of the river in the CPA (and east of the river where it curves north) have Rural Lands designations and there are no Semi-Rural Lands in the CPA, within 2 miles. Both the Proposed Project Map and the Reduced Density Alternative Map would pose inconsistencies with General Plan policies, and the No Project Alternative Map is the staff recommendation.

ME26: The Proposed Project is included in the Staff Recommended Project.

Facts in Support of the Finding:

The proposal for the ME26 Analysis Area was determined to not have any conflicts with General Plan Policies and Guiding Principles (project objectives).

There is no feasible Reduced Density Alternative Map for this Analysis Area (see Section 4.1 of the Final SEIR).

The ME26 Analysis Area includes one PSR and a Study Area, and is located just east of the Lake Morena Rural Village. During the General Plan Update, application of Semi-Rural densities in Campo/Lake Morena outside the Villages generally followed pre-existing parcelization and development patterns. However, the Analysis Area is a half mile from the Village boundary and shares some similarities with other areas of existing SR-10 in close proximity to the Village, including a mix of larger and smaller parcels. Eight of the 15 parcels in the Analysis Area are less than 11 acres. The area is groundwater-dependent, but the proposed SR-10 density would not be inconsistent with the applicable Groundwater Ordinance minimum lot size of 5 acres for this area. The Conservation Subdivision requirement would still be applicable under the proposed SR-10, and the application of this density would be consistent with the Community Development Model, given the location within the community. Therefore, the Proposed Project Map is the staff recommendation.

ME30A: The Reduced Density Alternative is included in the Staff Recommended Project.

Facts in Support of the Finding:

The Reduced Density Alternative Map would result in a reduction of potential environmental impacts in comparison to the Proposed Project Map, and more readily meet project objectives when compared to the Proposed Project Map and the No Project Map.

ME30A consists of just one PSR and no Study Area, situated just southwest of the Cameron Corners Rural Village and northwest of the Campo Rural Village. The Proposed Project Map would present inconsistencies with General Plan policies addressing feasibility and mapping patterns. As discussed above, application of Semi-Rural densities in the community generally followed pre-existing parcelization and development patterns. The practice considered the limited infrastructure and services in the community. Though ME30A is adjacent to an area of SR-1 and SR-4, the site consists of just one 262-acre parcel with one house, so the parcelization and development pattern would not fit that higher end Semi-Rural density. The site is groundwater-dependent and within a precipitation zone that would entail a Groundwater Ordinance minimum lot size of 8 acres, thus rendering the proposed SR-4 density (for the southern portion) infeasible. The Alternative Map would instead place SR-10 in the southern portion, maintaining the Conservation Subdivision requirement and consistency with Groundwater Ordinance minimum lot size restrictions, while also addressing the adjacency to two Village boundaries. Therefore, the Reduced Density Alternative Map is the staff recommendation.

NC3A: The Proposed Project Map is included in the Staff Recommended Project.

Facts in Support of the Finding:

The Proposed Project Map for the NC3A Analysis Area was determined to not have any conflicts with General Plan Policies and Guiding Principles (project objectives).

NC3A is another case of a large Analysis Area proposed to change from RL-20 to SR-10 with a small estimated increase in density potential, due to the existing parcel sizes and the steep slope areas applying the same 1 unit per 20 acres density in SR-10 that would be applicable in all areas under RL-20. It is located in a slope-constrained area on the outer edge of the Hidden Meadows CPA (part of the North County Metro Subregion), adjacent to the Daley Ranch Preserve within the City of Escondido jurisdiction. There are sufficient areas outside of steep slopes for placement of housing footprint for the few additional potential dwelling units. Given the close proximity to the infrastructure and services in Escondido and adjacent substantially higher densities in Hidden Meadows, the proposed SR-10 would be consistent with the Community Development Model and no General Plan inconsistencies have been found. Therefore, the Proposed Project Map is the staff recommendation.

NC18A: The Reduced Density Alternative Map is included in the Staff Recommended Project.

Facts in Support of the Finding:

The Reduced Density Alternative Map would result in a reduction of potential environmental impacts in comparison to the Proposed Project Map, and more readily meet project objectives when compared to the Proposed Project Map and the No Project Map.

The NC18A Analysis Area is located in a County island within the Sphere of Influence for Escondido, just east of the City's jurisdiction. It is within an area that retains an agricultural focus and community character, though the area transitions to a more suburban character just to the west. Two General Plan inconsistency findings for the Proposed Project Map are related to land use mapping to support continued agricultural operations and in connection to community character issues. As discussed further in the General Plan Conformance review, when large areas of predominant agricultural operations move into the SR-1 and higher densities, the research shows a tendency for substantial loss of agriculture. Another issue discussed for this area during the 2012 PSR workshop process was the emergency response travel time in relation to General Plan standards for that. Current models show only the western edge of the Analysis Area estimated to be within the 5-minute travel time standard for SR-1 (verification required at the subdivision application stage). This western portion also has a more limited agricultural footprint than the rest of the area and is in closest proximity to the more suburban character to the west. The Alternative Map would limit the SR-1 to the western portion, it was found to be in conformance with the General Plan, and is the staff recommendation.

NC22: The No Project Alternative is included in the Staff Recommended Project.

Facts in Support of the Finding:

The Proposed Project Map and Reduced Density Alternative Map have been rejected because they would result in substantially greater environmental impacts when compared to the No Project Alternative (Staff Recommended Project). The No Project Alternative Map would more readily meet project objectives when compared to the Proposed Project Map and the No Project Map.

The NC22 Analysis Area is in the southern portion of the Twin Oaks Subregional Group Area, adjacent to the City of San Marcos jurisdiction. Only the Study Area parcels in the western portion contain existing development. The Analysis Area is within Draft NCMSCP PAMA and is part of an undeveloped native habitat corridor that spans over 1,200 acres on this area. The PSR parcels, which cover 126 acres of the 154-acre Analysis Area contain a riparian wetland corridor (in the headwaters of Agua Hedionda Creek) including a pond, surrounded by hillsides of coastal sage scrub, and there isn't an area of limited constraints. Given the requirements for wetland buffers, Resource Protection Ordinance steep slope easements, fire clearing around structures, and restrictive limitations on septic and access roads over steep slopes and wetlands/wetland buffers, the feasibility of the density potential on these 126 acres is questionable. Considering these issues, certain General Plan inconsistencies were found, particularly related to feasibility and lower densities for areas with sensitive habitats. There is more assurance of feasibility under the Reduced Density Alternative Map; however, that option would still present inconsistency with General Plan Policy LU-6.2, due to the issues with removing the Conservation Subdivision requirement (applies to SR-10 and lower) in such a critical habitat area. Therefore, the No Project Alternative Map is the staff recommendation.

NC37: The Reduced Density Alternative Map is included in the Staff Recommended Project.

Facts in Support of the Finding:

The Reduced Density Alternative Map would result in a reduction of potential environmental impacts in comparison to the Proposed Project Map, and more readily meet project objectives when compared to the Proposed Project Map and the No Project Map.

Located in the northwestern portion of Twin Oaks, NC37 (one PSR and a Study Area) provides a contrast between areas of substantial existing development footprint in the eastern portion, close to Twin Oaks Valley Road, a County-maintained Mobility Element Road, and the western leg of the Analysis Area, transitioning to the more constrained San Marcos Mountains area of limited access and infrastructure. There is not a difference in the density calculation of the Proposed and Alternative Maps because the western leg (to remain SR-10 in the Alternative) would not have subdivision potential under the SR-10 or SR-4 designations. However, if ownership were consolidated in the western leg a reconfigured subdivision over that area could yield an additional lot or two under SR-4, as density calculation would just be rounded down once over the ownership as opposed to density calculations on a parcel by parcel basis. Maintaining the SR-10 in the western leg under the Reduced Density

Alternative Map also maintains a mapping pattern of very low density designations in the more mountainous areas of Twin Oaks. Therefore, the Reduced Density Alternative Map is the Staff Recommended Project.

NC38+: The Reduced Density Alternative Map is included in the Staff Recommended Project.

Facts in Support of the Finding:

The Reduced Density Alternative Map would result in a reduction of potential environmental impacts in comparison to the Proposed Project Map, and more readily meet project objectives when compared to the Proposed Project Map and the No Project Map.

The NC38+ Analysis Area is located in the southeastern portion of Twin Oaks, adjacent to San Marcos, and contains three PSRs (though one is under multiple ownerships and disconnected – NC48), and no Study Area. The area contains a low level of habitat and slope constraints in comparison to other North County Analysis Areas; however, it is part of a productive agricultural area and contains a FEMA floodplain/floodway. As discussed in the General Plan conformance findings, research of County guidelines and reports tends to support the assumption of converting large agricultural areas to SR-1 and higher densities usually results in substantial loss of agriculture. In addition to issues with the applicable agricultural preservation policy, multiple General Plan policies address steering development away from floodplains/floodways, which also pose feasibility issues for the reaching the density potential associated with the Proposed Project Map. The Reduced Density Alternative Map is recommended, which would maintain the SR-2 in the floodplain area, which also contains prime agricultural soils. This option would maintain a substantial area of SR-2 where there are prime agricultural soils, and is the staff recommendation.

PP30: The Reduced Density Alternative is included in the Staff Recommended Project.

Facts in Support of the Finding:

The Reduced Density Alternative Map would result in a reduction of potential environmental impacts in comparison to the Proposed Project Map, and more readily meet project objectives when compared to the Proposed Project Map and the No Project Map.

The PP30 Analysis Area is located in the eastern portion of the Subregion, just south of the Pauma Rural Village and west of the Rincon Reservation. The site has a high level of constraints. The San Luis Rey River runs through the southern and western portions. Though its floodplain area would remain RL-40 in both the Proposed and Alternative options, Yuima Creek and Potrero Creek come in from the northwest through the area proposed for SR-2 to connect to the river. The locations of these creek areas could make access to the southern portion of the SR-2 proposed area problematic. In addition to the creek corridors and riparian vegetation, the SR-2 proposed area contains areas of coastal sage scrub and oak woodlands. The site is groundwater dependent, with a Groundwater Ordinance imposed 5-acre minimum lot size, rendering the SR-2 density infeasible. Additional groundwater limitations may be

forthcoming with the adoption of a Groundwater Sustainability Plan (GSP – required by 2022 here) and implementation. Though jobs and services in the Pauma Rural Village (across SR-76) are very limited, the close proximity to the Village provides some justification for additional density potential that could feasibly be placed in the previously disturbed northeastern portion. The Reduced Density Alternative Map is recommended, to instead apply SR-10 in the eastern portion, which would maintain the Conservation Subdivision requirement. This option is the staff recommendation.

SD15: The Proposed Project Map is included in the Staff Recommended Project.

Facts in Support of the Finding:

The Proposed Project Map for the SD15 Analysis Area was determined to not have any conflicts with General Plan Policies and Guiding Principles (project objectives). It would more readily meet project objectives in comparison to the Reduced Density Alternative Map, the No Project Alternative Map, and the 2012 Board Letter Alternative Map (discussed below).

SD15 located within a 550-acre County island just west of the Elfin Forest community. The Proposed Project Map includes VR-10.9 in the central portion. The General Commercial area proposed for the northern 19.3 acres would include a mixed use residential density of 2 units per acre. These two portions are proposed for the Village Regional Category. These higher density/intensity uses could be supported by the infrastructure available to the site, including the adjacent 4-lane San Elijo Road (includes sidewalks and bike lanes), sewer service, and water service available. The Analysis Area is adjacent to the City of San Marcos with an estimated jobs total of over 34,000, and is only a half mile east of Carlsbad with an estimated jobs total of over 67,000. Public elementary and middle schools along with a grocery store are found a half mile away within the San Elijo Hills development, connected by sidewalk and bike lane. Though the site is in close proximity to high density development in San Marcos on the north, adjacent on the southwest, south, and southeast are open space preserves. The site is within the Draft NCMSCP PAMA with sensitive habitats and wildlife corridor connections, particularly in the southern portion. As such, it is anticipated the southern portion of the site would require open space preservation. General Plan Policy LU-1.8 allows transfer of density within a project site that has multiple designations when approved by a Major Use Permit or Specific Plan. With the flexible building type to allow multi-family residential, it is anticipated that the full density could be achieved in the VR-10.9/GC portion, with open space in the southern portion. Therefore, the Proposed Project Map is the staff recommendation.

VC7+: The Reduced Density Alternative Map is included in the Staff Recommended Project

Facts in Support of the Finding:

The Reduced Density Alternative would result in a reduction of potential environmental impacts in comparison to the Proposed Project Map, and more readily meet project objectives when compared to the Proposed Project Map and the No Project Map.

VC7+ is located in the western end of the Analysis Area, and exhibits an agricultural

character mixed with relatively low existing densities of residential uses. Public road access is limited to West Lilac Road on the north, but there are additional segments of private roads built to fire access standards. As discussed in the General Plan conformance findings, research of County guidelines and reports tends to support the notion of an SR-2 density supporting continued agriculture, in consideration of the small farm economy in the County. Though SR-2 can support continued agriculture, the SR-4 designation would provide greater assurance and the Alternative reduces the area of change, in consideration of agricultural preservation, the Community Development Model location in the outer ring of Semi-Rural, and environmental constraints. The northern portion that would remain SR-4 in the Alternative is mostly in the Draft NCMSCP PAMA and includes steep slopes descending to the Keys Creek riparian corridor at the northern edge of the Analysis Area. The southern portion that would also remain SR-4 in the Alternative contains steep slopes and is bisected by another creek corridor. The Valley Center Community Plan seeks preservation of these types of riparian and steep slope areas when it gets to the development phase. The Reduced Density Alternative Map was found to be in conformance with applicable General Plan and Community Plan policies, and is the staff recommendation.

VC51: The Reduced Density Alternative Map is included in the Staff Recommended Project

Facts in Support of the Finding:

The Reduced Density Alternative Map would result in a reduction of potential environmental impacts in comparison to the Proposed Project Map, and more readily meet project objectives when compared to the Proposed Project Map and the No Project Map.

The VC51 Analysis Area (one PSR and no Study Area) is in the northwestern portion of the CPA with a similar mix of agricultural and residential uses. There is an approximately 800-acre area of SR-4 adjacent to the north, which separates the Analysis Area from the edge of the community, so VC51 would not be considered part of a "greenbelt" of very low density at the edge of the community. This adjacent area of SR-4 contains a mix of larger (with subdivision potential under SR-4) and smaller parcels, with many of the larger parcels adjacent to the northern portion of the VC51 Analysis Area. This adjacent area of SR-4 also has a similar level of habitat constraints to the northern portion of VC51, with large portions previously cleared/graded for agricultural and residential uses. The Reduced Density Alternative Map limits the SR-4 change to the north-central portion (with only three additional potential dwelling units under this option), while maintaining RL-20 in more constrained areas on the eastern and western ends, and within the more access-constrained southern end. Five of the parcels in the Analysis Area are under Williamson Act contracts for preservation of agricultural uses and would not be able to subdivide (regardless of the GP designation) until completion of a non-renewal process for the associated contract, which typically takes 10 years. The Reduced Density Alternative Map was found to be in conformance with applicable General Plan and Community Plan policies, and is the staff recommendation.

VC57+: The Reduced Density Alternative is included in the Staff Recommended Project

Facts in Support of the Finding:

The Reduced Density Alternative Map would result in a reduction of potential environmental impacts in comparison to the Proposed Project Map, and more readily meet project objectives when compared to the Proposed Project Map and the No Project Map.

The VC57+ Analysis Area (three PSRs and a Study Area) is also in an area that includes extensive agricultural uses, in addition to residential uses. Research shows that an SR-2 designation can support continued agriculture, as discussed previously. It is adjacent to the northern Village boundary on the west, has a good network of public roads (two east-west, two north-south) to support additional subdivision potential, and has limited habitat and slope constraints. The biggest constraint is the presence of a FEMA and County mapped floodplain (which includes areas of estimated wetlands) in the western end, mostly south of Valley Center Road, which runs east-west through the middle of the Analysis Area. The areas to remain SR-4 in the Alternative Map include the area of the FEMA floodplain south of Valley Center Road, an area of steep slopes in the far southern end, and the far eastern end, which contains areas of native habitat and would provide an appropriate lower density Community Development Model transition area to buffer from areas of Rural Lands and open space further east. The Reduced Density Alternative Map is recommended and would maintain consistency with existing mapping patterns, while addressing constraints.

VC67: The No Project Alternative is included in the Staff Recommended Project.

Facts in Support of the Finding:

The Proposed Project Map and Reduced Intensity Alternative Map have been rejected because they would result in substantially greater environmental impacts when compared to the No Project Alternative (Staff Recommended Project). The No Project Alternative would more readily meet project objectives when compared to the Proposed Project Map and the No Project Map.

Within the VC67 Analysis Area, all of the one PSR parcel and almost all of the Study Area are in the County-mapped floodway. Residential uses would not be allowed in the floodway; however, the existing SR-2 facilitates agricultural uses as well, similar to other General Plan designations in the Semi-Rural and Rural Lands categories. Policy S-10.1 of the General Plan is consistent with RPO restrictions on floodways, and limits uses in floodways to agricultural, recreational, and other such low intensity uses. This area was specifically addressed during the General Plan Update, with the addition of issue and policy language in the Valley Center Community Plan, calling for the area to be re-designated as industrial if revised FEMA mapping is completed, that shows the area is outside the floodway (no revised FEMA or County floodplain/floodway mapping yet, since the General Plan Update). Increasing the allowed intensity of development within a floodway (whether FEMA or County) or otherwise relaxing regulations in these areas can affect the County's National Flood Insurance Program (NFIP) rating, and subsequently affect flood insurance rates in the County. Staff is recommending

maintaining the existing General Plan designation and zoning. The property owner has not initiated a process to revise the FEMA or County mapped floodplain in this area. Prior to changing this or allowing any Industrial designation within a mapped floodway, the mandatory policies prohibiting this (including S-10.1 noted above) in the General Plan would need to be amended. Considering the policy inconsistencies and environmental impacts associated with the Proposed Project Map and the Reduced Intensity Alternative Map, the staff recommendation is the No Project Alternative.

Western Champagne Gardens Specific Plan Area:

The Proposed Project Map is included in the Staff Recommended Project. For this Analysis Area, the Proposed Project Map and the Alternative Map are the same.

Facts in Support of the Finding:

The Proposed Project Map was determined to not have any conflicts with General Plan Policies and Guiding Principles (project objectives). It would more readily meeting project objectives in comparison to the No Project Alternative Map and the Environmentally Superior Map (discussed below).

Western Champagne Gardens (WCG) is located at the eastern end of the Bonsall CPA. Though the area is situated between the I-15 corridor and Champagne Boulevard, it contains a fairly high level of constraints and is mostly in the Draft NMSCP PAMA, because of the prevalence of coastal sage scrub and the potential to serve as a “ladder” of California gnatcatcher habitat along I-15. Lower residential densities are consistent with many other properties in such close proximity to the I-15 in this area, due to air quality and noise impacts of such close proximity to the freeway. A couple small areas (2.5 acres and 3.5 acres) of Rural Commercial, with C42 Visitor Serving Commercial zoning, are proposed in areas where there is previous clearing and/or mostly non-native grassland vegetation, and where existing commercial uses are near. The Proposed Project Map for Champagne Gardens areas has also been referenced as the Referral Map, and the Proposed/Referral Map is the same as the Alternative Map (previously referenced as the Preliminary Staff Recommendation Map here), as the outreach process led to some consensus on proposals, considering constraints. The Proposed Project Map was found to be in conformance with applicable General Plan and Community Plan policies, and is the staff recommendation.

Eastern Champagne Gardens Specific Plan Area:

The Reduced Density Alternative Map is included in the Staff Recommended Project.

Facts in Support of the Finding:

The Reduced Density Alternative Map would result in a reduction of potential environmental impacts in comparison to the Proposed Project Map, and more readily meet project objectives when compared to the Proposed Project Map, No Project Alternative Map, and the Environmentally Superior Map (discussed below).

Eastern Champagne Gardens (ECG) is split between the CPAs of Valley Center and Hidden Meadows (part of the North County Metro Subregion). The southernmost property of ECG contains the existing Deer Park Winery and the Residential/Commercial zone provides the best option for consistency with their existing operations, in addition to being consistent with each of the GP designation options. ECG contains areas of coastal sage scrub on hillsides, but also contains an area of oak woodlands on Subarea 4, and a riparian corridor through each of the properties, which includes a FEMA and County-mapped floodway/floodplain and areas of estimated wetlands. Though it has a high level of constraints, ECG is in a sewer service area and has an existing sewer line under the properties. This provides a good opportunity for clustering to avoid constraints and the proposed Valley Center Community Plan Policy Revision was added to the project as a result of the ECG outreach process, addressing clustering capabilities in sewer service areas of Valley Center. The Reduced Density Alternative Map addresses policies related to feasibility, floodplains, mapping in areas of sensitive habitats, and demonstrates a greater level of mapping consistency with the adjacent area of SR-4 to the north. The Reduced Density Alternative Map was found to be in conformance with applicable General Plan and Community Plan policies, and is the staff recommendation.

Valley Center Residential Policy 8:

The Proposed Project option is included in the Staff Recommended Project.

Facts in Support of the Finding:

The proposed revision to Residential Policy 8 of the Valley Center Community Plan results from the analysis and outreach process for the former CG SP area. The policy addresses minimum lot sizes for projects proposing clustering of units. The revision would change the minimum lot size allowed in the SR-2 designation, from one acre to one-half acre, and change the minimum lot size allowed in the SR-4 designation from two acres to one acre. The policy (and proposed revisions) would not automatically apply these minimum lot sizes in SR-2 and SR-4 designations, but would restrict clustered projects from proposing lot sizes lower than the minimums. The stipulations in the policy for allowing the noted minimum lot sizes are not proposed to change. One of those is the requirement for sewer service. The properties in Eastern Champagne Gardens are proposed for SR-2 in the Proposed Project Map (except Subarea 2, proposed for SR-4) and for SR-4 in the Reduced Density Alternative map. These properties are within the sewer service area of the Valley Center Municipal Water District, and proximate to an existing sewer line under the properties. Due to wetland, floodplain, habitat, and slope constraints on portions of the properties, a clustered site design is anticipated to reach the density potential associated with either designation, so that homes could be placed in the areas of limited constraints. Additional lot size flexibility would provide a greater level of assurance of density feasibility, while not affecting the allowed density associated with the designation adopted. The scope of the revision is very limited, as there is only one other parcel in the CPA with subdivision potential that is either SR-2 or SR-4 and within the sewer service area. The Valley Center CPG recommended approval of the proposed change on May 8, 2017. The proposed revision would allow for reduced environmental impacts in affected areas, it is consistent with the General Plan, and is included in the staff recommendation.

References

Final SEIR Section 4, alternatives-related responses to comments, and all other alternatives-related evidence in the administrative record.

SD15 2012 Board Letter Alternative

Description

The SD15 Board Letter Alternative is a second alternative map for PSR Analysis Area SD15. This alternative would change the land use designation from SR-1 to General Commercial for the entire analysis area, but residential density applied in zoning would not be increased above the current, estimated 61 dwelling units associated with SR-1. As such, this alternative would result in much more potential commercial development but the same residential density as the existing General Plan, which is a decrease of 301 dwelling units in comparison to the Proposed Project.

Finding

See Section V above for the rationale explaining why the Proposed Project Map and not this option is included in the Staff Recommended Project. The Proposed Project Map would more readily meet project objectives.

References

Final SEIR Section 4, alternatives-related responses to comments, and all other alternatives-related evidence in the administrative record.

Western and Eastern Champagne Gardens Environmentally Superior Alternative

Description

The Environmentally Superior Map Alternative for the former both Western Champagne Gardens and Eastern Champagne Gardens proposes changes to the 2011 General Plan land uses designations from SPA and RL-20 to all SR-10. These land use changes would result in a maximum of 12 potential dwelling units; a reduction of 20 dwelling units in comparison to the Proposed Project and a reduction of 8 dwelling units in comparison to the Preliminary Staff Recommendation Map Alternative (Reduced Density Alternative). This alternative would also result in a zone change from SPA to A70, RR, and RC. The proposed C42 zoning of the Referral Map and Preliminary Staff Recommendation Map Alternative in part of Subareas 6 and 8 would not be included in this alternative.

Finding

See Section V above for the rationale explaining the why Proposed Project Map (for Western Champagne Gardens) and Reduced Density Alternative Map (for Eastern Champagne Gardens) and not this option is included in the Staff Recommended Project. These options would more readily meet project objectives.

References

Final SEIR Section 4, alternatives-related responses to comments, and all other alternatives-related evidence in the administrative record.

Table 1 PSR Alternatives Comparison of Impacts

| Issue Areas of Significance | Staff Recommended Project | Alternatives to the Staff Recommended Project | | | | |
|--|---------------------------|---|------------------------|---------------------------------|------------------------------------|--|
| | | 1 | 2 | 3 | 4 | 5 |
| | | Proposed Project | No Project Alternative | PSR Reduced Density Alternative | SD15 2012 Board Letter Alternative | Champagne Gardens Environmentally Superior Alternative |
| 2.1 Aesthetics | SU | ▲ | ▼ | — | ▲ | ▼ |
| 2.2 Agricultural Resources | SU | ▲ | ▼ | — | — | ▼ |
| 2.3 Air Quality | SU | ▲ | ▼ | ▲ | ▲ | ▼ |
| 2.4 Biological Resources | SU | ▲ | ▼ | ▼ | ▲ | ▼ |
| 2.5 Cultural and Paleontological Resources | LTS | — | ▼ | — | — | ▼ |
| 2.6 Geology and Soils | LTS | — | ▼ | — | — | ▼ |
| 2.7 Hazards and Hazardous Materials | SU | ▲ | ▼ | ▲ | ▲ | ▼ |
| 2.8 Hydrology and Water Quality | SU | ▲ | ▼ | ▼ | ▲ | ▼ |
| 2.9 Land Use | SU | ▲ | ▼ | — | ▲ | — |
| 2.10 Mineral Resources | SU | ▲ | ▼ | ▼ | — | — |
| 2.11 Noise | SU | ▲ | ▼ | ▲ | ▲ | ▼ |
| 2.12 Population and Housing | SU | ▲ | ▼ | — | ▼ | ▼ |
| 2.13 Public Services | SU | ▲ | ▼ | ▼ | ▼ | ▼ |

| Issue Areas of Significance | Staff Recommended Project | Alternatives to the Staff Recommended Project | | | | |
|-----------------------------|---------------------------|---|------------------------|---------------------------------|------------------------------------|--|
| | | 1 | 2 | 3 | 4 | 5 |
| | | Proposed Project | No Project Alternative | PSR Reduced Density Alternative | SD15 2012 Board Letter Alternative | Champagne Gardens Environmentally Superior Alternative |
| 2.14 Recreation | LTS | — | ▼ | ▼ | ▼ | ▼ |
| 2.15 Transportation | SU | ▲ | ▼ | ▲ | ▲ | ▼ |
| 2.16 Utilities | SU | ▲ | ▼ | ▼ | — | ▼ |
| 2.17 Global Climate Change | LTS | ▲ | ▼ | ▲ | ▲ | ▼ |

▲ Alternative is likely to result in greater impacts to issue when compared to Staff Recommended Project.

— Alternative is likely to result in similar impacts to issue when compared to Staff Recommended Project.

▼ Alternative is likely to result in reduced impacts to issue when compared to Staff Recommended Project.

LTS Less than Significant with mitigation measures

SU Potentially significant and unavoidable impact

VI. NO RECIRCULATION REQUIRED

The County of San Diego Board of Supervisors hereby finds that the responses to comments made on the Draft SEIR and any revisions reflected in the Final SEIR merely clarify and amplify the analysis presented in the documents and do not trigger the need to recirculate the SEIR under State CEQA Guidelines Section 15088.5(b), which provides that “[r]ecirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR.”

Pursuant to State CEQA Guidelines Section 15088.5(a), “[a] lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review under Section 15087 but before certification. New information added to an EIR is not ‘significant’ unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project’s proponents have declined to implement. ”Significant new information” requiring recirculation includes, for example, a disclosure showing that:

- (1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
- (2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
- (3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project’s proponents decline to adopt it.
- (4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded. (*Mountain Lion Coalition v. Fish and Game Com.* (1989) 214 Cal.App.3d 1043.)”

The County recognizes that new information has been added to the SEIR since circulation of the Draft SEIR, but the new information serves simply to clarify or amplify information already found in the Draft SEIR or improve the project and its protection of the environment. It does not rise to the level of “significant new information.”

None of the new information added to the Final SEIR raises important new issues about significant adverse effects on the environment without providing corresponding mitigation to maintain the proper finding that the impact is below the level of significance. The ultimate conclusions about the project’s significant impacts do not change in light of any new information added to the SEIR. Therefore, any new information in the EIR is insignificant for purposes of recirculation, particularly as set forth in Section 15088.5(b) of the State CEQA Guidelines.

The County also finds that the Draft SEIR, which includes analysis supported by numerous technical reports and expert opinion, was not inadequate or conclusory such that the public was deprived of a meaningful opportunity to review and comment on the EIR. Additional analyses are not required to comply with the requirements of CEQA prior to certifying the Final EIR for the project. Accordingly, the County finds that recirculation is not required pursuant to CEQA.

In support of the foregoing, it is relevant to point out some of the key policies of CEQA set forth by the Legislature:

To provide more meaningful public disclosure, reduce the time and cost required to prepare an environmental impact report, and focus on potentially significant effects on the environment of a proposed project, lead agencies shall, in accordance with Section 21000, focus the discussion in the environmental impact report on those potential effects on the environment of a proposed project which the lead agency has determined are or may be significant. Lead agencies may limit discussion on other effects to a brief explanation as to why those effects are not potentially significant. (Public Resources Code 21002.1(e).)

The legislature further finds and declares that it is the policy of the state that...(f) All persons and public agencies involved in the environmental review process be responsible for carrying out the process in the most efficient, expeditious manner in order to conserve the available financial, governmental, physical, and social resources with the objective that those resources may be better applied toward mitigation of actual significant effects on the environment. (Public Resources Code 21003(f).)

The State CEQA Guidelines (Section 15003) also expressly summarizes some of the key policies under CEQA as recognized by the Courts:

(g) The purpose of CEQA is not to generate paper, but to compel government at all levels to make decisions with environmental consequences in mind. (*Bozung v. LAFCO* (1975) 13 Cal. 3d 263.)

(i) CEQA does not require technical perfection in an EIR, but rather adequacy, completeness, and a good-faith effort at full disclosure. A court does not pass upon the correctness of an EIR's environmental conclusions, but only determines if the EIR is sufficient as an informational document. (*Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal. App. 3d 692.)

(j) CEQA requires that decisions be informed and balanced. It must not be subverted into an instrument for the oppression and delay of social, economic, or recreational development or advancement. (*Laurel Heights Improvement Assoc. v. Regents of U.S.* (1993) 6 Cal. 4th 1112 and *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal. 3d 553.) (See 15003 (g), (i) and (j).)

Keeping in mind the policies expressed above, the County has provided a good faith effort to analyze the environmental impacts of the project using sound methodologies with the assistance of experts in environmental analysis. Having considered that process and the requirements of CEQA, the County concludes that public comment through a recirculation is not warranted, but that public comments through the public hearing process will be given due consideration.

Pursuant to State CEQA Guidelines, Section 15088.5(a), the County of San Diego is required to recirculate an EIR when significant new information is added to the EIR after public review, but before certification. Significant new information can include changes in the project or environmental setting, as well as additional data or other information. New information added to an EIR is not significant unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse effect of the project or a feasible way to mitigate or avoid such an effect (including feasible alternatives) that the project's proponents have declined to implement.

Changes to the Draft SEIR

A complete presentation of changes made to the Draft SEIR subsequent to the public review period has been prepared and is included in the table below. Revisions to the Final SEIR were made in response to comments made during public review and during the numerous hearings on the project. The Staff Recommended Project reflects these public comments.

None of the conditions warranting recirculation of the Draft SEIR, as specified in State CEQA Guidelines Section 15088.5 and described above, has occurred. The responses to comments and the addition of information do not result in or show any new significant impacts; there is no increase in the severity of a significant impact identified in the Draft SEIR, following application of existing mitigation; no feasible alternatives have been recommended that would avoid a significant impact, or that the County has refused to adopt; and as to the Draft SEIR adequacy, the County believes the Final SEIR is complete and fully compliant with CEQA.

| Section (Page) | Change | Reason for Change |
|-----------------------------|---|--|
| Section 1.1.1, page 1-1 | Revised sentence to state "... will have the responsibility for <u>its evaluation and consideration for possible subsequent approval.</u> " | Clarification |
| Section 1.3.4, page 1-10 | Revised sentence to state: "As described under Goal M-2 of the Mobility Element, there are instances where it is more appropriate to retain a road classification <u>(which determines the number of travel lanes)</u> that could result in LOS E/F operations rather than change the Mobility Element classification to increase the number of travel lanes. | Clarification |
| Section 1.7.1, page 1-12 | Revised second sentence of third paragraph to read: "The traffic study used a 2014 baseline by <u>starting with the traffic volumes contained in the Mobility Element of the County General Plan 2011 PEIR and adding the traffic from adopted year 2014 GPAs,</u> to the traffic volumes contained in the Mobility Element of the County General Plan. " | Clarification |
| Section 1.9, end of section | New paragraph added describing the preliminary policy analysis reports that were prepared for the PSR areas. | Clarification and in response to comment O3-A-3. |
| Section 1.11.1, page 1-17 | Revised first paragraph to read: "Such projections were based upon data maintained by SANDAG and the Southern California Association of Governments (SCAG) for the San Diego County region to the year 2030, and are no longer <u>available applicable</u> for the Proposed Project. As such, the Proposed Project will utilize the <u>2011 PEIR information and an available updated SANDAG regional model.</u> 2050 growth projections. SANDAG is largely responsible for maintenance of economic, demographic, land use, and transportation data projections for both the County and the incorporated cities. Therefore, the cumulative analysis in this SEIR utilizes the same <u>methodology for population and employment projections as presented in the 2011 PEIR from the following sources.</u> " | Clarification |
| Section 1.11.10, page 1-25 | Revised sentence as follows: "the applicant (<u>Murai-Sab, LLC (ColRich)</u>) has proposed an 89-unit clustered..." | Clarification |

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| Figure 1-1 Countywide PSR Analysis Areas | Figure 1-1 has been replaced. It was an older version with a reference to NC42. | Accuracy, to remove reference to PSR NC42. |
| Section 2.1.3.1, under heading Crest-Dehesa Subregion | Revised sentence as follows: “PSR Analysis Area CD14 <u>proposes land uses that would result in 7 additional potential dwelling units and is located</u> mostly on an undeveloped hillside, providing scenic views from public roads and residences in the neighborhood to the west.” | Clarification, consistency. |
| Section 2.1.3.1, under heading North County Metro Subregion | Revised sentences as follows: “Construction and operation impacts would have the potential to <u>add 11 potential dwelling units that could</u> detract from the scenic views from the Daley Ranch trails.” And “Construction and operation impacts would have the potential to <u>add 52 potential dwelling units that could</u> detract from the scenic views of the Analysis Area.” | Clarification consistency. |
| Section 2.1.3.1, under heading San Dieguito | Revised sentences as follows: “Construction and operation impacts would have the potential to <u>add 301 potential dwelling units that could</u> detract from the scenic views of the Analysis Area.” | Clarification consistency. |
| Section 2.2.2 | Revised text as follows: “The regulatory framework described in the 2011 PEIR are the same as the regulatory framework evaluated in this SEIR, <u>except for the following additions:-</u> <u>The County Board of Supervisors approved the Agriculture Promotion Program (POD-14-001) and certified the project EIR on March 15, 2017. The program included Zoning Ordinance amendments and permit processing improvements to promote agricultural uses and production in the unincorporated area of the County. Subsequent to the approval of the General Plan Update in 2011, the CEQA guidelines were amended to include consideration of potential impacts to forestry resources. Potential impacts to forestry resources are addressed in the analysis for the Proposed Project, and is presented in Section 2.2.3.4 below.</u> No <u>other</u> changes to the regulatory framework have been identified that would alter the conclusions from the 2011 PEIR.” | Text revised in response to comment O3-33 |
| Section 2.2.3.1, 2 nd paragraph of Impact Analysis | Revised sentence to state: “Therefore, any parcels <u>with a density of smaller than one dwelling unit per acre or more</u> have been calculated to result in a 100 percent conversion of agricultural resources to non-agricultural uses for the purposes of this analysis.” | Clarification |
| Table 2.4-2 Estimated Vegetation Classification Acreages... | Revised to remove row stating <1 acre of Orchards/Vineyards for SD15, as there are none. | Accuracy and Response to Comment I25-10. |
| Section 2.7.5.8 | Revised text as follows: Implementation of the following adopted General Plan policies and 2011 PEIR mitigation measures would reduce <u>the direct Impact HZ-2 and cumulative Impact HZ-3</u> former CGSP but not to a level below significant; ” | Text revised for accuracy as cumulative impact HZ-3 had not been included in the sentence. |

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| <p>Page 2.8-4, under heading Sustainable Groundwater Management Act of 2014</p> | <p>Added the following text at the end of the discussion of SGMA: <u>“PSR Analysis Areas DS8 and DS24 are located within the Borrego groundwater basin. The County has also been coordinating with Mootamai Municipal Water District (MWD), Pauma MWD, Pauma Valley Community Services District, Upper San Luis Rey Resource Conservation District, Valley Center MWD and Yuima MWD, to act as a single multi-agency Groundwater Sustainability Agency (GSA) to develop a single Groundwater Sustainability Plan (GSP) for the San Luis Rey Valley groundwater basin. All but the very southern portion of PSR Analysis Area PP30 is located in the Pauma Subbasin of this groundwater basin and will be subject to the GSP when approved. The County is also coordinating with other agencies to develop GSPs for the San Diego River Valley and San Pasqual Valley groundwater basins. There are no PSR Analysis Areas located in these basins.”</u></p> | <p>Text revised to describe status of other groundwater basins subject to SGMA.</p> |
| <p>Section 2.8.5.1, under heading Infeasible Mitigation Measures</p> | <p>Revised sentence as follows: <u>“The County has determined the following measures to be infeasible in the 2011 GPU PEIR; these measures are still infeasible for the same reasons as stated and will not be implemented.”</u></p> | <p>Clarification</p> |
| <p>Section 2.8.5.4, under heading Adopted 2011 PEIR Mitigation Measures</p> | <p>Revised text as follows: <u>“In addition to the 2011 PEIR mitigation measures listed below, mitigation measures Hyd-1.1, Hyd-1.2, Hyd-1.3, Hyd-1.4, Hyd-1.5, and Hyd-2.5 listed in Sections 2.8.5.1 and 2.8.5.2 for Issues 1 and 2 would reduce direct Impact HY-4 and cumulative Impact HY-13 to a level below significant and are incorporated here by reference.”</u></p> | <p>Text revised for accuracy as there was no identification of a cumulative impact HY-13.</p> |
| <p>Section 2.9.3.2 under heading San Diego County 2011 General Plan Update</p> | <p>Revised two sentences as follows: <u>“The goals not listed do not contain underlying policies determined to be applicable to stand-alone GPAs/Rezones and were not relied upon in the 2011 PEIR to reduce environmental impacts.”</u> And – <u>“Those policies that are not applicable to a stand-alone GPA/Rezone, or and were not relied upon in the 2011 PEIR to reduce environmental impacts are not discussed below.”</u></p> | <p>Clarification</p> |
| <p>Page 2.9-16 under discussion of DS8</p> | <p>Revised sentence as follows: <u>“However, this noted inconsistency has not been determined to constitute a significant impact, because there is room for discretion by decision makers to weigh other factors more heavily than the high level of unbuilt planned density and groundwater critical overdraft situation, and there is not the level of substantial evidence to support a significant impact determination in this case.”</u></p> | <p>Clarification</p> |
| <p>Page 2.9-17 under discussion of DS24</p> | <p>Revised sentence as follows: <u>“Though the LU-2.3 language requires some judgement by decision makers, there is overwhelming substantial evidence in the record to indicate inconsistency with this policy.”</u></p> | <p>Clarification</p> |
| <p>Page 2.9-18 under discussion of FB2+</p> | <p>Revised sentence as follows: <u>“However, this noted inconsistency has not been determined to constitute a significant impact because there is room for discretion by decision makers to weigh various factors in determining whether a greenbelt would be sufficiently maintained, and there is not the level of substantial evidence to support a significant impact determination in this case.”</u></p> | <p>Clarification</p> |

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| Page 2.9-19 under discussion of FB21+ | Revised sentence as follows: "However, this noted inconsistency has not been determined to constitute a significant impact because there is room for discretion by decision makers to weigh other factors more heavily in evaluating policy consistency, <u>and there is not the level of substantial evidence to support a significant impact determination in this case.</u> " | Clarification |
| Page 2.9-28 under discussion of BO18+ | Revised sentence as follows: "However, this noted inconsistency has not been determined to constitute a significant impact because there is room for discretion by decision makers in consideration of the proposed SR-4 density as it relates to the parameters of the policy, <u>and there is not the level of substantial evidence to support a significant impact determination in this case.</u> " | Clarification |
| Page 2.9-31 under discussion of FB2+ for Policy LU-6.2 and LU-6.11 | Revised two sentences as follows: "However, this noted inconsistency has not been determined to constitute a significant impact because there is room for discretion by decision makers to weigh other factors more heavily in evaluating policy consistency, <u>and there is not the level of substantial evidence to support a significant impact determination in this case.</u> " | Clarification |
| Page 2.9-33 under discussion of FB21+ | Revised sentence as follows: "However, this noted inconsistency has not been determined to constitute a significant impact because there is some room for judgement of decision makers to weigh other factors more heavily in evaluating policy consistency, including the Conservation Subdivision requirement, which would remain under the proposed SR-10 designation, <u>and there is not the level of substantial evidence to support a significant impact determination in this case.</u> " | Clarification |
| Page 2.9-40 under discussion of Former Champagne Gardens Specific Plan Area | Revised sentence as follows: "However, this noted inconsistency has not been determined to constitute a significant impact because there is room for discretion by decision makers to weigh other factors more heavily in evaluating policy consistency, including the proximity to the Welk Resort to the south, <u>and there is not the level of substantial evidence to support a significant impact determination in this case.</u> " | Clarification |
| Page 2.9-55 under discussion of DS24 | Revised sentence as follows: "However, this noted inconsistency has not been determined to constitute a significant impact because the inconsistency is based on the weighing of several factors in the planning analysis. There is room for discretion by decision makers in weighing other factors as they relate to the parameters of the policy, <u>and there is not the level of substantial evidence to support a significant impact determination in this case.</u> " | Clarification |
| Section 2.9, page 2.9-57 | Added text describing how NC37 comports with GP Policy COS-14.1. | Review of NC37 with respect to Policy COS-14.1 was inadvertently left out of Draft SEIR, and in response to comment I1-7. |

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| Page 2.9-58 under discussion of PP30 | Sentences revised as follows: “There is room for discretion by decision makers in weighing other factors as they relate to the parameters of the policy, <u>and there is not the level of substantial evidence to support a significant impact determination in this case.</u> and †The mitigation measures outlined in Section 2.3 (Air Quality) and in this section would apply to future development.” | Clarification |
| Page 2.9-61 under discussion of BO18+ | Sentences revised as follows: “However, this noted inconsistency has not been determined to constitute a significant impact because there is room for discretion by decision makers in consideration of the proposed SR-4 density as it relates to the parameters of the policy, <u>and there is not the level of substantial evidence to support a significant impact determination in this case.</u> and †The mitigation measures outlined in Section 2.7 (Hazards) and in this section would apply to future development.” | Clarification |
| Page 2.9-65 under discussion of NC38+ | Sentence revised as follows: “However, this noted inconsistency has not been determined to constitute a significant impact because there is room for discretion by decision makers in consideration of clustering possibilities and other factors, <u>and there is not the level of substantial evidence to support a significant impact determination in this case.</u> ” | Clarification |
| Page 2.9-68 under discussion of Former Champagne Gardens Specific Plan Area | Sentence revised as follows: “However, this noted inconsistency has not been determined to constitute a significant impact because there is room for discretion by decision makers in consideration of clustering possibilities and other factors, <u>and there is not the level of substantial evidence to support a significant impact determination in this case.</u> ” | Clarification |
| Page 2.9-70 under discussion of NC38+ | Sentences revised as follows: “However, these noted inconsistencies have not been determined to constitute significant impacts because there is room for discretion by decision makers in consideration of clustering possibilities and other factors, <u>and there is not the level of substantial evidence to support a significant impact determination in this case.</u> and †The mitigation measures outlined in Section 2.7 (Hazards) and in this section would apply to future development.” | Clarification |
| Page 2.9-72 under discussion of Former Champagne Gardens Specific Plan Area | Sentences revised as follows: “However, these noted inconsistencies have not been determined to constitute significant impacts because there is room for discretion by decision makers in consideration of clustering possibilities and other factors, <u>and there is not the level of substantial evidence to support a significant impact determination in this case.</u> and †The mitigation measures outlined in Section 2.7 (Hazards) and in this section would apply to future development.” | Clarification |
| Page 2.9-75 under discussion of Sphere of Influence | Text revised as follows: “The proposed land use designation for PSR Analysis Area SD15 would be C-1 (0.450.70 FAR) with mixed use zoning at two dwelling units per acre, SR-0.5 (one dwelling unit per 0.5, 1, or 2 acres), and VR-10.9 (10.9 dwelling units per one acre).” | Accuracy |

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| Section 2.9.5.2 under the heading Mitigation Measures | Revised text as follows: “Implementation of mitigation measures M-Air-1.1 and M-Air-1.2 as listed in Section 2.3.5.1 for Issue 1, and mitigation measure M-Pop-1.1 as listed in Section 2.12.5.1 for Issue 1 of this SEIR would reduce Impact LU-1 and Impact LU-2 and are incorporated here by reference.” | Accuracy, consistency with Table S-1. |
| Section 2.13.3.1, last paragraph | Revised text as follows: “Under the Proposed Project, increasing allowable land use density within PSR Analysis Areas BO18+, DS24, FB2+, FB17, FB21+, NC18A, NC22, NC37, NC38+, SD15, and VC51 would reduce allowed emergency response travel response times, in areas where This could result in future development within these PSR Analysis Areas that cannot meet emergency response travel response times without the provision of additional access roads and/or new or physically altered facilities.” | Clarification |
| Section 2.15.1 | Revised text as follows: “The baseline traffic projections from the 2011 PEIR were used...” And “ <u>As this SEIR is a Plan-to-Plan analysis this approach is the appropriate methodology to compare the Proposed Project against the approved General Plan. No new traffic counts were conducted for this SEIR.</u> ” | Clarification |
| Sections 2.17.2, 2.17.3.1, 2.17.5.1, 2.17.5.2 | Text revised to reflect that the CAP has been approved and is no longer “draft,” and to revise mitigation measure CC-1.2 per the approved CAP. | Accuracy |
| Section 4.2.1.8 under heading Groundwater Supplies and Recharge | Text revised as follows: “Therefore, the Reduced Density Alternatives would result in a significant and unavoidable impact associated with <u>groundwater supplies and recharge</u> water quality standards and requirements. ” | Accuracy |
| Table 4-1, row for VC51 Analysis Area and for Totals | Revised number of Potential Dwelling Unit Alternative from 49 to 17, and number of Potential Dwelling Unit Increase from Alternative from 5 to 3 and Totals from 664 to 662. | Accuracy |
| Section 5, References, CARB 2018 | Added the following reference to Section 5: <u>California Air Resources Board (CARB), 2018 Compliance Offset Program website. Online URL: https://www.arb.ca.gov/cc/capandtrade/offsets/offsets.htm</u> | To provide additional information in response to comment O3-130 |
| Section 5, References, County of San Diego (County). 2016a | Revised reference as follows: County of San Diego (County). 2016a. San Diego County Planning & Developing Services: Public Meetings Preliminary Policy Analysis Worksheets – Property Specific Requests GPA & Rezone. February 2017. | Reference added to Preliminary Policy Analysis Worksheets for the PSRs that were available online in response to comment O3-18 and O3-A-3. |
| Section 5, References, County of San Diego (County). 2018 | Revised reference as follows: County of San Diego (County). 2018 2017. Draft Climate Action Plan. February August . Accessed <u>May 22, 2018</u> September 20, 2017 . Online URL: | For consistency with approved CAP |
| Section 5, References, County of San Diego (County). 2018 | Revised reference as follows: County of San Diego (County). 2018 2017. Draft CAP Consistency Review Checklist. Online URL: | For consistency with approved CAP |

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| Section 7.2.17.1 | Added Mitigation Measure CC-1.2 to be consistent with Section 2.17.5.1. | Consistency |
| Appendix D, Noise Technical Report | Edited the following two sentences in the second full paragraph on page 7: “It is situated immediately to the west of land that is currently used as a junkyard the former San Marcos landfill and San Marcos Recycling Center and Trash to Energy Plan building.” And - “ However, †The existing land use immediately surrounding the proposed PSR <u>on the southeast, south, and southwest</u> is open space park or preserve.” | Accuracy and in response to comment I-25-17. |
| Appendix E, Traffic Impact Report | Added Appendix E4 – Memorandum dated April 9, 2018 by Chen Ryan regarding Freeway Mainline Analysis | Added to support determination of no impacts to freeway segments in response to comment C3-6, O6-3, O6-5, O6-6 and O6-7. |

VII. CERTIFICATION OF THE FINAL ENVIRONMENTAL IMPACT REPORT, STATE CEQA GUIDELINES § 15090

The Board of Supervisors certifies that the Final SEIR, dated ____ 2018, on file with the Department of Planning & Development Services, as Environmental Log # PDS2012-ER-12-00-003 has been completed in compliance with CEQA and the State CEQA Guidelines, that the SEIR was presented to the Board of Supervisors, and that the Board of Supervisors reviewed and considered the information contained therein before approving the project, and that the SEIR reflects the independent judgment and analysis of the Board of Supervisors.

VIII. STATEMENT OF OVERRIDING CONSIDERATIONS

The Findings required under CEQA (Public Resources Code Sections 21000 *et seq.*) and the State CEQA Guidelines (California Code Regulations, Title 14, Section 15000 *et seq.*) supporting the approval of the County of San Diego (“County”) Property Specific Requests General Plan Amendment and Rezone conclude that the County's approval of the project would result in significant impacts that cannot be substantially lessened or avoided. Despite these impacts, the County of San Diego Board of Supervisors chooses to approve the Property Specific Requests General Plan Amendment and Rezone because specific economic, social, and environmental benefits of the project outweigh and override these significant and unavoidable impacts. The County has adopted all feasible mitigation measures with respect to the significant and unavoidable environmental impacts listed below. In addition, the County has analyzed a reasonable range of alternatives to the Proposed Project. Based on the analysis, the County has determined that the Staff Recommended Project meets the objectives of the project and is feasible and environmentally preferable to the Proposed Project. Therefore, the County is adopting the Property Specific Requests General Plan Amendment and Rezone (Staff Recommended Project), and sets forth this Statement of Overriding Considerations for its adoption despite the significant and unavoidable environmental impacts identified in the SEIR and noted below.

Significant and Unavoidable Environmental Impacts

| Final SEIR Section | Subject/Issue |
|-----------------------|--|
| 2.1.3.3 | Visual Character or Quality |
| 2.1.3.4 | Light or Glare |
| 2.2.3.1 | Conversion of Agricultural Resources |
| 2.2.3.3 | Indirect Conversion of Agricultural Resources |
| 2.3.3.1 | Air Quality Plans |
| 2.3.3.2 | Air Quality Violations |
| 2.3.3.3 | Non-Attainment Criteria Pollutants |
| 2.3.3.4 | Sensitive Receptors |
| 2.4.3.1 | Special-Status Plant Species |
| 2.4.3.2 | Riparian Habitat and Other Sensitive Natural Communities |
| 2.4.3.4 | Wildlife Movement Corridors and Nursery Sites |
| 2.7.3.8 | Wildland Fires |
| 2.8.3.1 | Water Quality Standards and Requirements |
| 2.8.3.2 | Groundwater Supplies and Recharge |
| 2.9.3.2 | Conflicts with Land Use Plans, Policies, and Regulations |
| 2.10.3.1 | Mineral Resource Availability |
| 2.11.3.3 | Permanent Increase in Ambient Noise Levels |
| 2.12.3.1 | Population Growth |
| 2.13.3.3 | School Services |
| 2.15.3.1 | Unincorporated County Traffic and Level of Service Standards |
| 2.15.3.2 | Road Safety |
| 2.16.3.4 | Adequate Water Supplies |

Each of the reasons for approval cited below is a separate and independent basis that justifies approval of the Property Specific Requests General Plan Amendment and Rezone. Thus, even if a court were to set aside any particular reason or reasons, the Board of Supervisors finds that it would stand by its determination that each reason, or any combinations of reasons, is a sufficient basis for approving the Property Specific Requests General Plan Amendment and Rezone notwithstanding the significant and unavoidable impacts that may occur. The substantial evidence supporting the various benefits can be found in the CEQA Findings Regarding Significant Effects, the Final SEIR, and the Record of Proceedings.

Statement of Overriding Considerations

The County finds that the Staff Recommended Project (hereinafter referred to as the “Project”) would have the following specific economic, social, and environmental benefits:

1. The Project provides a strategic framework to accommodate a reasonable share of projected regional population growth at intensities that are appropriate with respect to existing development, environmental resources, community character, available services, and available infrastructure.
2. The Project promotes sustainable development through goals and policies that balance the need for adequate infrastructure, housing, and economic vitality with the need for resource management, environmental protection, and preservation of quality of life for residents in the unincorporated County.

3. The Project provides a realistic land use map that accounts for existing development, physical constraints, hazards, and incompatible uses and assigns densities and use types accordingly to ensure that communities and neighborhoods remain safe and livable.

For the foregoing reasons, the County finds that the Project's unavoidable potential significant environmental impacts are outweighed by these considerable benefits.

IX. STATEMENT OF LOCATION AND CUSTODIAN OF DOCUMENTS OR OTHER MATERIALS THAT CONSTITUTE A RECORD OF PROCEEDINGS

Project Name: County of San Diego Property Specific Requests General Plan Amendment and Rezone

Reference Case Numbers: PDS2012-3800-12-005
PDS2014-REZ-14-006
PDS2012-ER-12-00-003;
SCH No. 2015121012

CEQA (Section 21081.6(a)(2)) requires that the lead agency (in this case the County of San Diego) specify the location and custodian of the documents or other material that constitute the record of proceedings upon which its decision is based. It is the purpose of this statement to satisfy this requirement.

Location of Documents and Other Materials That Constitute the Record of Proceedings:

County of San Diego, Planning & Development Services
Project Processing Center
5510 Overland Avenue, Suite 110
San Diego, California 92123

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

Custodian:

County of San Diego, Planning & Development Services
Project Processing Center
5510 Overland Avenue, Suite 110
San Diego, California 92123

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