County of San Diego

VINCE NICOLETTI
INTERIM DIRECTOR

PLANNING & DEVELOPMENT SERVICES
5510 OVERLAND AVENUE, SUITE 310, SAN DIEGO, CA 92123
www.sdcounty.ca.gov/pds

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

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

   Good Shepherd Cemetery Major Use Permit; PDS2020-MUP-20-004; PDS2020-CC-20-0030; PDS2020-ER-20-08-006

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

3. a. Contact: Sean Oberbauer, Land Use & Environmental Planning Manager
   b. Phone number: (619) 323-5287
   c. E-mail: Sean.Oberbauer@sdcounty.ca.gov

4. Project location:

   The project site is located on approximately 14.5 acres located at 1505 Buena Vista Drive at its intersection with Keys Place in an unincorporated area of the County of San Diego, California surrounded by the Cities of Vista and Oceanside. The project location's regional location and vicinity are shown in Figure 1 and Figure 2.

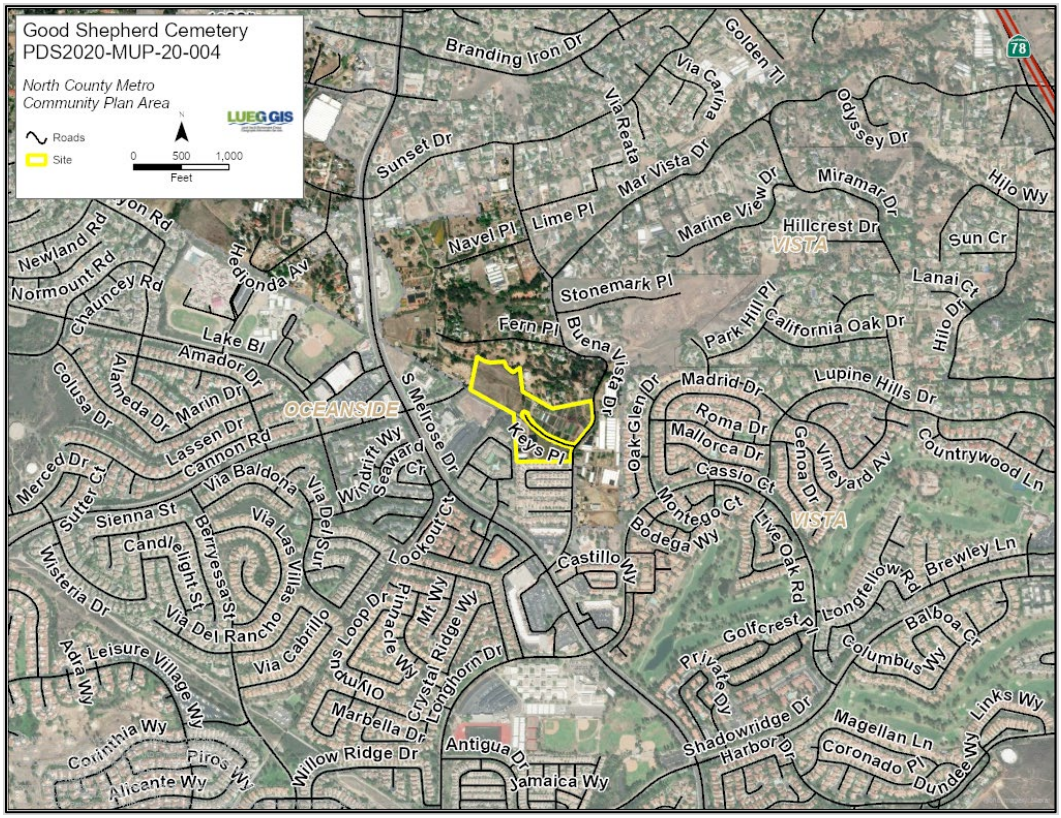

Figure 1 – Project Regional Vicinity

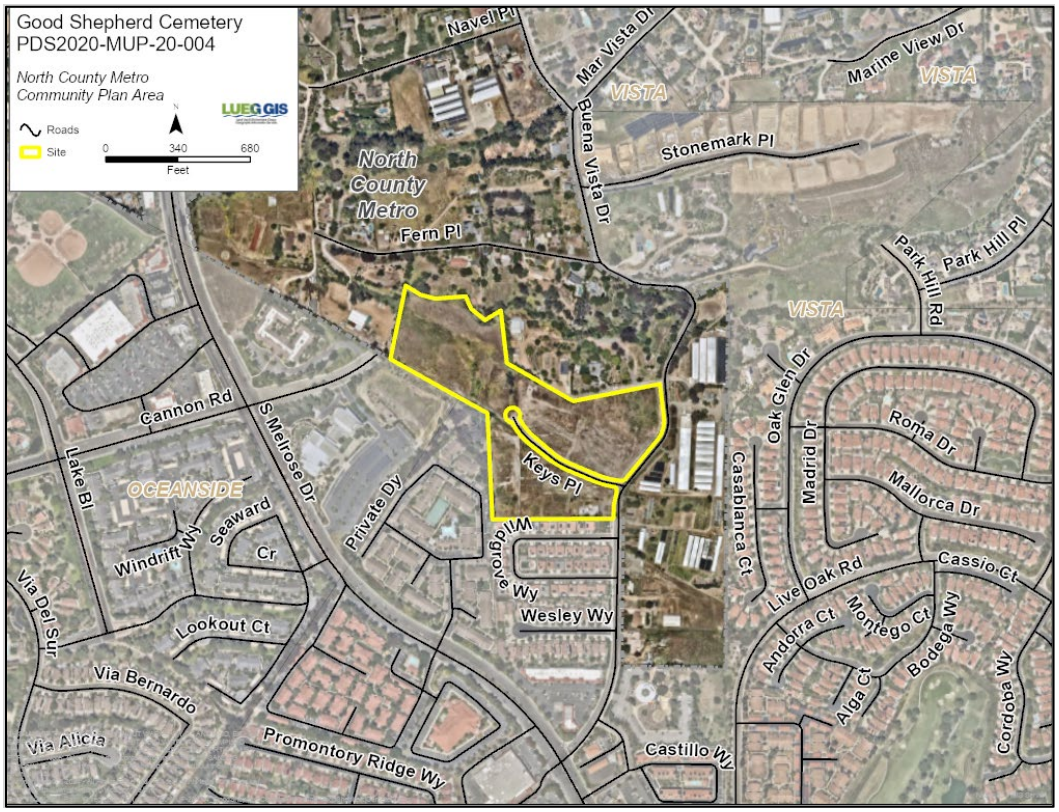

Figure 2 – Project Site

5. Project Applicant name and address:

The Roman Catholic Diocese of San Diego
3888 Paducah Drive
San Diego, CA 92117
(619) 264-3127
Email: Mario@holycrosssd.com

6. General Plan

Community Plan:	North County Metropolitan Subregional Planning Area
Regional Category:	Semi-Rural
Land Use Designation:	Semi-Rural Residential (SR-1)
Density:	SR-1, Slope Dependent Density
Floor Area Ratio (FAR)	-

7. Zoning

Use Regulation:	Agriculture (A70)
Animal Regulations:	M
Density:	-
Lot Size:	1 Acre
Building Type:	T
Max. Floor Area:	-
Floor Area Ratio (FAR)	-
Height:	G
Lot Coverage:	-
Setback:	O
Open Space:	-
Special Area Regulation:	-/C

8. Description of project:

The proposed project would require a Major Use Permit develop a cemetery, including conversion of an existing house to an administration building, parking, a new internal circulation (road) system, an entry gate with guard building, fencing or solid wall around the perimeter of the site, landscaping, and utility improvements on a 14.5-acre site. The remainder of the site will be reserved for grave sites. The proposed cemetery would provide opportunities for visitation to gravesite areas. The site was previously developed with a nursery and box tree storage site with several buildings and structures that would be removed.

The proposed project would include the clearing and grading of the majority of the site, including the removal of existing facilities and accessory structures associated with the previous use of the site. The existing residence at 1505 Buena Vista Drive would be renovated and repurposed as an administrative office. The new approximately 2,220-square-foot administrative office would include a new covered patio, new entryway, and new parking area to the rear of the structure with designated Americans with Disabilities Act of 1980 (ADA)-accessible parking spaces.

Additional parking would be provided on the northwest portion of the site at the end of an access drive. In accordance with the California Green Building Code (CALGreen) Section 5.106.5, the project would include electric vehicle charging infrastructure in the parking lots, designated parking for clean air vehicles, and short-term and long-term bicycle parking (see Section XVII, Transportation).

The proposed project would also require the realignment and Vacation of Keys Place to accommodate the proposed on-site circulation system. Access to the project site would be at Keys Place from Buena Vista Drive. All properties associated with the Major Use Permit would be merged into a single lot through the processing of a Certificate of Compliance/Merger. At the project access, an entry gate would be provided with a guard access building.

The cemetery would be constructed in multiple phases over time. Phase one of the project consists of installation of landscaping, a parking lot, and access improvements in the southeastern portion of the property. The existing residence would be retained as part of phase one. Phase two of the project consists of construction and grading of the majority of the property, the remodeling of the existing residence into an approximately 2,200 square foot construction of an administration building, additional parking and landscaping, and road improvements along Buena Vista Drive.

During project operation, the site would be accessible to the public from dawn until dusk. The proposed cemetery would employ administrative staff and groundskeepers. It is anticipated that hours of operation for the administrative office would follow standard working hours, approximately 8:00 a.m. to 5:00 p.m., Monday through Friday. Groundskeepers may be present on site at other hours or on other days, depending on need. Staff would arrive and remain on site at staggered times throughout each working day. Primary users of the site are anticipated to be residents of the neighboring communities and patrons of the Roman Catholic Diocese of San Diego.

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

The project site consists of an approximately 14.5-acre property in the North County Metro Community Planning Area, within unincorporated San Diego County, adjacent to the jurisdictions of the cities of Oceanside and Vista. The site was previously developed with a nursery and box tree storage site with several buildings and structures that would be removed; however, a majority of the project site is currently vacant and undeveloped. A single residence is located at the southeastern corner of the property at 1505 Buena Vista Drive.

The project site is bounded by Buena Vista Drive to the east, residential development to the north and northwest, natural drainages adjacent to the St. Thomas More Catholic Church, and residential development to the southwest. The project site is primarily surrounded by residential uses, the Rancho Vista Nursery, and St. Thomas More Catholic Church. According to the County of San Diego General Plan Land Use Map, surrounding land use designations are Landscape/Open Space, Single-Family Detached, Multi-Family Residential, Open Space or Park Preserve, and Intensive Agriculture. Planned land use designations in the vicinity include Institutions, Mobile Home, Recreation, Single-Family

Residential, Spaced Rural Residential, Multi-Family Residential, and Commercial and Office.

Elevations at the site range from approximately 350 to 460 feet above mean sea level. The topography consists of relatively flat land with a gentle northwest-facing slope.

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

Permit Type/Action	**Agency**
Air Quality Permit to Construct	San Diego Air Pollution Control District (SDAPCD)
Certificate of Compliance	County of San Diego
Clean Water Act Section 401, 404 Permits and Section 1602 Permit	San Diego Regional Water Quality Control Board (RWQCB), U.S. Army Corps. Of Engineer, U.S. Fish and Wildlife Service, California Department of Fish and Wildlife
Fire District Approval	Vista Fire Protection District
General Construction Storm water Permit	RWQCB
Grading Permit	County of San Diego
Landscape Plans	County of San Diego
Major Use Permit	County of San Diego
Public Improvement Plans	County of San Diego
Encroachment Permit	County of San Diego
Sewer District Approval	Buena Sanitation District
Vacation of Public Road	County of San Diego
Water District Approval	Vista Irrigation District

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

YES ☒ NO ☐

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

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

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

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

☐ On the basis of this Initial Study, PDS finds that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☒ On the basis of this Initial Study, PDS finds that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ On the basis of this Initial Study, PDS finds that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

	December 19, 2024
Signature	Date
Sean Oberbauer	Land Use/Environmental Planning Manager
Printed Name	Title

INSTRUCTIONS ON EVALUATION OF ENVIRONMENTAL IMPACTS

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

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

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

4. “Less Than Significant With Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level.

5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
   a) Earlier Analysis Used. Identify and state where they are available for review.
   b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
   c) Mitigation Measures. For effects that are “Less Than Significant With Mitigation Incorporated,” describe the mitigation measures that were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

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

7. The explanation of each issue should identify:
   a) The significance criteria or threshold, if any, used to evaluate each question; and
   b) The mitigation measure identified, if any, to reduce the impact to less than significance

I. AESTHETICS.

Except as provided in Public Resources Code §21099.

a) Would the project have a substantial adverse effect on a scenic vista?

☐ Potentially Significant Impact	☒ Less than Significant Impact
☐ Less Than Significant With Mitigation Incorporated	☐ No Impact

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

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

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

The proposed project would develop a phased cemetery, with an approximately 2,200-square-foot administration building, parking, a new internal circulation system, fencing surrounding the project site, parking spaces, landscaping, utility improvements, and grave sites on a 14.5-acre site in the North County Metropolitan Subregional Planning Area. Surrounding land uses consist of multi-family residences immediately to the south, rural residences to the north, institutional (i.e., library, St. Thomas More Catholic Church), commercial, and multi-family (assisted living) residences to the west, and agricultural (wholesale nursery) uses to the east. Buena Vista Park the nearest open space area to the project site, located approximately 3.9 miles south of the project site within the City of Vista. Other RCAs identified within the North County Metro Community Plan are located more than 4 miles away from the project site, including the San Marcos Mountains are (#22 of the North County Metro Community Plan) and Mount Whitney Double peak (#29 of the North County Metro Community Plan). Due to distance and intervening highways, structures, and topography, no impacts would occur to these RCAs. Additionally, given the urban environment surrounding the project site and the proposed landscape screening and fencing (see Section I[c] below), the proposed project would not substantially degrade a scenic vista. Therefore, the project would have a less than significant effect on a scenic vista.

b) Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

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

Less than Significant Impact: The project site is not located near or visible within the composite viewshed of a State scenic highway and will not damage or remove visual resources within a State scenic highway. The nearest designated State scenic highway is a portion of SR-52 located over 24 miles southeast of the project site. The project is located approximately 5.3 miles east of I-8 and approximately 5.4 miles south of SR-76, both of which are identified as eligible for designation as a State Scenic Highway. Both I-8 and SR-76 are also listed as Scenic Highways in the County's Conservation and Open Space Element of the General Plan. The nearest Scenic Highway identified in the General Plan is Twin Oaks Valley Road which is approximately 5.2 miles east of the project site. Due to distance, topography, and intervening structures, the project site is not visible from these highways. As such, the project site is not visible within the composite viewshed of a State scenic highway or County Scenic Corridor and will not damage or remove visual resources within a State scenic highway or County Scenic Corridor. Therefore, impacts would be less than significant.

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

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Discussion/Explanation: Visual character is the objective composition of the visible landscape within a viewshed. Visual character is based on the organization of the pattern elements line, form, color, and texture. Visual character is commonly discussed in terms of dominance, scale, diversity, and continuity. Visual quality is the viewer's perception of the visual environment and varies based on exposure, sensitivity, and expectation of the viewers.

Less Than Significant Impact: The project site is located in an urbanized area and is surrounded by multi-family residences immediately to the south, rural residences to the north, institutional (i.e., library, St. Thomas More Catholic Church), commercial, and multi-family (assisted living) residences to the west, and agricultural (wholesale nursery) uses to the east.

The proposed project would develop a phased cemetery, with an approximately 2,200-square-foot administration building, parking, a new internal circulation system, fencing surrounding the project site, parking spaces, landscaping, utility improvements, and grave sites on a 14.5-acre site in the North County Metropolitan Subregional Planning Area which is permitted within the Limited Agriculture (A70) Zoning Use Regulation upon approval of a Major Use Permit. The project would include a setback of 50 feet from the residences to the south of the project site to create a buffer from the adjacent residences to the grave sites. Additionally, the project would include landscape screening and fencing surrounding the entire project site. Structures associated with the project will be located only in the southeastern portion of the project site in a location that includes an existing residence. The project would be required to include preparation of Landscape Plans pursuant to the County's Water Efficient Landscape Design Manual and Water Conservation in Landscaping Ordinance. The project would also be in conformance with the County's Parking Design Manual and Grading Ordinance. Therefore, the project would not conflict with applicable zoning and other regulations governing scenic quality.

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

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Less Than Significant Impact: The project is located within Zone B as identified by the San Diego County Light Pollution Code. Zone B is any area of the unincorporated County that is not within 15 miles from the Mount Palomar or Mount Laguna observatory. The project would not adversely affect nighttime views or astronomical observations because the project would conform to the County's Light Pollution Code (Section 51.201-51.209) and lighting standards. Therefore, the project would not create a significant new source of substantial light or glare, which would adversely affect daytime or nighttime views in the area.

II. AGRICULTURE AND FORESTRY RESOURCES.

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

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Discussion/Explanation: A Local Agricultural Resources Assessment (LARA) Model is included in the following section.

The LARA model takes into account the following factors in determining the importance of an agricultural resource:

- Required Factors:
  - Water

  - Climate
  - Soil Quality
- Complementary Factors:
  - Surrounding Land Uses
  - Land Use Consistency
  - Topography

The complementary factors are not assessed if one of the required factors is deemed to be of low quality.

Less Than Significant Impact: Historically, the project site has been used for row and field crops although the site is not incorporated within either a Williamson Act Agriculture Contract or an Agricultural Preserve Area. The site was previously developed with a nursery and box tree storage site with several buildings and structures and the project's soil quality rating is based on the presence of soils that meet the quality criteria for Prime Farmland or Farmland of Statewide Importance as defined by the Farmland Mapping and Monitoring Program (FMMP) that are available for agricultural use and that have been previously used for agriculture. However, under the LARA model, if one of the required factors of water, climate, and soil is identified as low quality, the site would not be considered a significant agricultural resource. Based on the results of the Local Agricultural Resources Assessment (LARA) Model, although the site received a high rating for water and climate, the site received a low value for soil quality. For example, the project's soil quality rating is based on the presence of soils that meet the quality criteria for Prime Farmland or Farmland of Statewide Importance as defined by the FMMP that are available for agricultural use and that have been previously used for agriculture.

The project site includes approximately 6.11 acres are of Basanko Clay, 9 to 15 percent slopes (BsD); 0.72 acres are of Cienaba Coarse Sandy Loam, 5 to 15 percent slopes, eroded (CID2); 2.23 acres are Cienaba Coarse Sandy Loam, 15 to 30 percent slopes, eroded (CIE2); 3.11 acres are of Fallbrook Sandy Loam, 15 to 30 percent slopes, eroded (FAE2); and 4.09 acres are of Diablo Clay, 9 to 15 percent slopes, (DaD).

Diablo Clay (DaD) soil type is considered by the State to be a quality soil and is listed as a Farmland of Statewide Local Importance Soil by FMMP. DaD soil type encompasses about a quarter of the project site at 4.09 acres to which 3.91 acres are considered available for agricultural use. The remaining 11.53 acres available for agricultural use on site does not meet the soil quality criteria defined by FMMP.

The project's soil quality score is 0.24, as detailed in Table 1, Soil Quality Matrix. Projects with a soil quality matrix score below 0.33 are valued low since it indicates that the large majority of the agricultural resources onsite have soils that do not meet the soil quality criteria for Prime Farmland or Farmland of Statewide Importance, defined by FMMP. Moreover, the project site has less than 10 contiguous acres of Prime Farmland or Farmland of Statewide Importance soil. Therefore, the project receives a low rating for soil quality based on this score. As such, the site is not considered an important agricultural resource, and impacts to agricultural resources would be less than significant.

Table 1. Soil Quality Matrix

Soil Type	Acreage of each Soil Type	Unavailable for Agricultural Use	Available for Agricultural Use	Proportion of Project Site	Prime Farmland or Farmland of Statewide Significance (Yes = 1, No = 0)	Multiply Column E
BsD	6.11	0.14	5.97	0.367	0	0
CID2	0.72	0.12	0.60	0.037	0	0
CIE2	2.23	0.38	1.85	0.114	0	0
FAE2	3.11	0	3.11	0.191	0	0
DaD	4.09	0.18	3.91	0.240	1	0.24
Total	**16.26**	**-**	**15.44**	**-**	**-**	**0.24**

Table 2. Soil Quality Matrix

Soil Quality Matrix Score	Soil Quality Rating
The site has a Soil Quality Matrix score ranging from 0.66 to 1.0 and has a minimum of 10 acres of contiguous Prime Farmland or Statewide Importance Soils	High
The site has a Soil Quality Matrix score ranging from 0.33 to 0.66 or the site has a minimum of 10 acres of contiguous Prime Farmland or Statewide Importance Soils	Moderate
The site has a Soil Quality Matrix score less than 0.33 and does not have 10 acres or more of contiguous Prime Farmland or Statewide Importance Soils	**Low**

b) Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less than Significant Impact
☒ No Impact

No Impact: The project site is not under a Williamson Act Contract. Although the project site is zoned Limited Agriculture (A70), the use of a cemetery would not impede the operations or establishment of agricultural uses in the project vicinity. The project does not consist of construction of uses or materials that would prevent the establishment or operations of agricultural uses in the project vicinity. Therefore, the project does not conflict with existing zoning for agricultural use, or a Williamson Act Contract.

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

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less than Significant Impact
☒ No Impact

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

d) Would the project result in the loss of forest land or conversion of forest land to non-forest use?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less than Significant Impact
☒ No Impact

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

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

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Less Than Significant Impact: Refer to Section II(a) and Section II(c). Impacts to agricultural uses would be less than significant. No impacts would occur to forest uses.

III. AIR QUALITY.

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

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

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Discussion/Explanation: An Air Quality Analysis Report was prepared for the project by LSA Associates dated March 2022 (see Appendix A). The following responses have incorporated the analysis from the report.

Less Than Significant Impact: The regional air quality standards (RAQS) and State Implementation Plan (SIP) rely on the San Diego Association of Government's (SANDAG's) growth projections, which are developed based on proposed buildout of land uses identified in the County's General Plan. Because the RAQS and SIP project future air quality conditions

based on growth projections assuming buildout of the County's General Plan, it is assumed that a project involving development that is consistent with the growth anticipated by the County's General Plan are consistent with the RAQS and SIP. According to the 2022 RAQS, mobile sources are the largest contributor to air quality emissions, specifically emissions generated from operations of typical residential and commercial developments, and therefore, can be used to define project intensity (i.e., less mobile emissions results in less land use intensity).

The proposed project would develop a phased cemetery, with an approximately 2,200-square-foot administration building, parking, a new internal circulation system, fencing surrounding the project site, parking spaces, landscaping, utility improvements, and grave sites on a 14.5-acre site in the North County Metropolitan Subregional Planning Area. The project site is designated Semi-Rural Residential (SR-1) in the County's General Plan and is zoned Limited Agriculture (A70). Cemeteries are allowable uses with the issuance of a Major Use Permit, pursuant to Sections 2700-2705 of the Zoning Ordinance. The proposed cemetery would not result in an increase in population growth projections used to develop the RAQS. The project would not conflict with the region's future employment and housing needs. Additionally, as stated in the Transportation Assessment Memorandum (Appendix K and L) and Section XVII, Transportation, the project replaces existing land uses and would result in a reduction of daily trip generation by 38 average daily trips (ADT) and a net decrease of 84 vehicle miles traveled (VMT). As detailed in the Air Quality Analysis Report (see Appendix A), the project would not result in construction or operational emissions in excess of the applicable significance thresholds for all criteria pollutants (see also Tables 4 and 5). The project would, therefore, not result in an increase in emissions that are not already accounted for in the RAQS. The project will be constructed in phases and construction emissions and potential pollutants will be emitted over time due to the phasing of the project which will reduce concentrations of emissions. This project is not a transportation project that would affect the region's transportation systems and should not increase transportation demands within the local area. Therefore, the project would not induce substantial population and would not conflict with or obstruct implementation of the RAQS and SIP. In addition, the construction and operational emissions from the project are anticipated to be below established screening-level thresholds (SLTs), as addressed under Section III(b), and would not violate any ambient air quality standards.

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

☐	Potentially Significant Impact	☒	Less than Significant Impact
☐	Less Than Significant With Mitigation Incorporated	☐	No Impact

Discussion/Explanation: The San Diego APCD does not provide quantitative thresholds for determining the significance of construction or mobile source-related impacts. However, the San Diego APCD does specify Air Quality Impact Analysis (AQIA) trigger levels for new or modified stationary sources (APCD Rules 20.2 and 20.3). If these incremental levels for stationary sources are exceeded, an AQIA must be performed for the proposed new or modified source. Although these trigger levels do not generally apply to mobile sources or general land development projects, for comparative purposes these levels may be used to evaluate the increased emissions which would be discharged to the San Diego Air Basin from proposed land development projects. For projects whose stationary-source emissions are below these criteria,

no AQIA is typically required, and project level emissions are presumed to be less than significant.

For CEQA purposes, these SLTs can be used to demonstrate that a project's total emissions would not result in a significant impact to air quality. The daily SLTs are most appropriately used for the standard construction and operational emissions. When project emissions have the potential to approach or exceed the SLTs listed below in Table 1, additional air quality modeling may need to be prepared to demonstrate that ground level concentrations resulting from project emissions (with background levels) will be below National and California Ambient Air Quality Standard (NAAQS and CAAQS, respectively).

APCD Rules 20.2 and 20.3 do not have AQIA thresholds for emissions of volatile organic compounds (VOCs) and $PM_{2.5}$. The use of the screening level for VOCs specified by the South Coast Air Quality Management District (SCAQMD), which generally has stricter emissions thresholds than San Diego's APCD, is recommended for evaluating projects in San Diego County. For $PM_{2.5}$, the EPA "Proposed Rule to Implement the Fine Particle National Ambient Air Quality Standards" published September 8, 2005, which quantifies significant emissions as 10 tons per year, will be used as the screening-level criteria as shown in Table 1 below:

Table 3. San Diego County Screening-Level Thresholds for Air Quality Impact Analysis

Pollutant	Total Emissions		
	Lbs. per Hour	Lbs. per Day	Tons per Year
Respirable Particulate Matter (PM_{10})	---	100	15
Fine Particulate Matter ($PM_{2.5}$)	--- *	55	10*
Nitrogen Oxides (NO_x)	25	250	40
Sulfur Oxides (SO_x)	25	250	40
Carbon Monoxide (CO)	100	550	100
Lead	---	3.2	0.6
Volatile Organic Compounds (VOCs)	---	75**	13.7***

Notes: * EPA "Proposed Rule to Implement the Fine Particle National Ambient Air Quality Standards" published September 8, 2005. Also used by the SCAQMD.
** Threshold for VOCs based on the threshold of significance for VOCs from the SCAQMD for the Coachella Valley.
*** 13.7 Tons Per Year threshold based on 75 lbs/day multiplied by 365 days/year and divided by 2,000 lbs/ton.

Less Than Significant Impact: Currently, San Diego County is in "non-attainment" status for the NAAQS and CAAQS federal and state Ozone (O_3) and state Particulate Matter less than or equal to 10 microns and less than or equal to 2.5 microns (PM_{10} and $PM_{2.5}$). O_3 is formed when volatile organic compounds (VOCs) and nitrogen oxides (NO_x) react in the presence of sunlight. VOC sources include any source that burns fuels (e.g., gasoline, natural gas, wood, oil); solvents; petroleum processing and storage; and pesticides. Sources of PM_{10} in both urban and rural areas include the following: motor vehicles, wood burning stoves and fireplaces, dust from construction, landfills, agriculture, wildfires, brush/waste burning, and industrial sources of windblown dust from open lands.

The project would contribute to construction and operational sources of criteria pollutant air emissions. An analysis of estimated construction and operational emissions was completed using SCAQMD's California Emissions Estimator Model (CalEEMod).

Project construction is estimated to take six months. On-site emissions are attributed to emissions occurring within the project area, such as the activity of construction equipment. Off-site emissions related to the project include vendor, hauling, and worker vehicle trips to and from the project site. Emissions of VOCs, NO_X, CO, SO_X, PM_{10}, and $PM_{2.5}$ would not exceed the County's SLTs during project construction, due to the project's requirement to comply with standard applicable regulatory requirements, such as site watering during construction activities as required by the County grading permit and SDAPCD Rule 55 and the use of low-VOC paint (50 g/L for flat coatings and 100 g/L for traffic marking coating) as required by SDAPCD Rule 67.0.1. The project will be constructed in phases and construction emissions and potential pollutants will be emitted over time due to the phasing of the project which will reduce concentrations of emissions. Therefore, project construction would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment (O_3, PM_{10}, and $PM_{2.5}$) under an applicable federal or state ambient air quality standard. The project's air quality emissions would not exceed the County's SLTs; therefore, as the thresholds were developed to protect the public health that align with ambient air quality standards, air quality impacts on public health would be less than significant, and no mitigation measures would be necessary (see Table 4 below and Appendix A).

Table 4. Estimated Project Construction-Related Air Emissions

Pollutant	Maximum Project Emissions (Lbs. per Day)	Screening-Level Thresholds (Lbs. per Day)	Above Threshold?
Respirable Particulate Matter (PM_{10})	8.10	100	No
Fine Particulate Matter ($PM_{2.5}$)	5.01	55	No
Nitrogen Oxides (NO_x)	41.35	250	No
Sulfur Oxides (SO_x)	0.07	250	No
Carbon Monoxide (CO)	30.19	550	No
Volatile Organic Compounds (VOCs)	14.84	75	No

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

During operation, full project operations after construction of all phases are expected to result in 138 ADT, which is 38 fewer ADT than previously existing uses on-site (see Section XVII, *Transportation*). Operation of the project would generate criteria air pollutant emissions associated with area sources (e.g., architectural coatings, consumer products, and landscaping equipment), energy sources (i.e., use of natural gas for space and water heating), and mobile sources (i.e., vehicle trips to and from the project site). Criteria air pollutant emissions generated during the operation of project would not exceed San Diego County SLTs for VOCs, NO_X, CO, SO_X, PM_{10}, and $PM_{2.5}$. Therefore, project operation would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard. Air quality impacts would be less than significant, and no mitigation measures would be necessary (see Table 5 below and Appendix A).

Table 5. Estimated Project Operational Air Emissions

Pollutant	Maximum Project Emissions (Lbs. per Day)	Screening-Level Thresholds (Lbs. per Day)	Above Threshold?
Respirable Particulate Matter (PM_{10})	0.94	100	No
Fine Particulate Matter ($PM_{2.5}$)	0.35	55	No

Nitrogen Oxides (NO_x)	3.84	250	No
Sulfur Oxides (SO_x)	0.01	250	No
Carbon Monoxide (CO)	6.85	550	No
Volatile Organic Compounds (VOCs)	0.64	75	No

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

Cumulative impacts could occur if the most intensive phases of construction for the proposed project occur simultaneously with intensive phases of other construction projects in close proximity. The most intensive construction phase for the project and for typical developments occurs during earthwork and grading activities. During these phases, the primary criteria air pollutant of concern would be PM_{10}. The project's estimated emissions of criteria air pollutants, specifically PM_{10}, were estimated to be 8.10 lb/day, which is under the County's SLTs of 100 lb/day during construction activities. The project will be constructed in phases and construction emissions and potential pollutants will be emitted over time due to the phasing of the project which will reduce concentrations of emissions. In addition, due to the highly dispersive nature of PM, a cumulative impact during construction activities would only occur if a project adjacent to the proposed project undergoes simultaneous grading/earthwork activities and emits significantly greater PM_{10} emissions than the project. Because all projects developed within the County would be required to comply with the County Grading Ordinance and SDAPCD Rule 55, this scenario is not anticipated to occur.

The project is proposing development that is consistent with the County's General Plan; thus, operational air emissions are considered to have been accounted for in the General Plan Update EIR. The RAQS and SIP were prepared consistent with growth forecasts in the General Plan. Thus, the project would not result in a cumulatively considerable net increase in criteria air pollutants for which the region is currently in non-attainment.

c) Expose sensitive receptors to substantial pollutant concentrations?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Discussion/Explanation: Air quality regulators typically define sensitive receptors as schools (Preschool – 12th Grade), hospitals, resident care facilities, day-care centers, residences, or other facilities that may house individuals with health conditions that would be adversely impacted by changes in air quality.

Less Than Significant Impact: The nearest sensitive receptors to the project site are residences adjacent to the north and south of the project site. The project would generate construction emissions in the vicinity of sensitive receptors.

Carbon Monoxide Hotspot Analysis
As previously discussed, carbon monoxide is a colorless, odorless, poisonous gas that may be found in high concentrations near areas of high traffic volumes. CO emissions are a function of vehicle idling time, meteorological conditions, and traffic flow. The SDAB is in attainment of State and federal CO standards. The SDAPCD measured a maximum 8-hour CO concentration of 1.4

parts per million (ppm) inn 2020 (SDAPCD 2021). CO concentrations were well below the federal standard 8-hour standard of 9 ppm.

A CO hotspot analysis is required by the County if a proposed development would cause road intersections to operate at or below a LOS E with intersection peak-hour trips exceeding 3,000 trips. Trip generation and distribution for workers and delivery trucks would ultimately vary depending on the phase of construction; however, based on daily construction worker, vendor trip, and haul truck estimates, maximum daily trips resulting from construction activities would be approximately 25 truck trips per day. This would be well below the screening threshold of a peak hour volume of 3,000 vehicles. Construction trips would occur throughout the day and would not all occur during the peak hour. No haul trucks associated with import or export of soil during grading would occur because all cut and fill activities would be balanced on site. Additionally, as stated in Section XVII, Transportation, all intersections within the proposed project study area are currently operating at LOS D or better. As previously described, the project would result in 138 trips to the local intersections (38 fewer ADT than existing uses on-site), which would not degrade an existing intersection LOS from an acceptable level (D or better) to LOS E or F.

The additional traffic generated during project operation would not cause intersections in the vicinity of the project site to operate at or below LOS E. The traffic study concluded that the proposed project would not result in any significant intersection impacts (Appendix K and L). Therefore, a CO hotspot analysis is not required for the proposed project and project-generated trips would not result in, or substantially contribute to, CO concentrations that exceed the eight-hour ambient air quality standards along area roadways and intersections.

Toxic Air Contaminants (TACs)
Construction-related activities would result in short-term, project-generated emissions of diesel particulate matter (DPM) exhaust emissions from off-road, heavy-duty diesel equipment for site preparation grading, building construction, and other construction activities. DPM was identified as a toxic air contaminant (TAC) by CARB in 1998. The potential cancer risk from the inhalation of DPM (discussed in the following paragraphs) outweighs the potential non-cancer health impacts and is therefore the focus of this discussion (CARB 2017).

Generation of DPM from construction projects typically occurs in a single area for a short period. Construction of the proposed project would occur over approximately 14 months. The dose to which the receptors are exposed is the primary factor used to determine health risk. Dose is a function of the concentration of a substance or substances in the environment and the extent of exposure that person has with the substance. Dose is positively correlated with time, meaning that a longer exposure period would result in a higher exposure level for the Maximally Exposed Individual. The risks estimated for a Maximally Exposed Individual are higher if a fixed exposure occurs over a longer period of time. According to the California Office of Environmental Health Hazard Assessment (OEHHA), health risk assessments (HRA), which determine the exposure of sensitive receptors to toxic emissions, should be based on a 30-year exposure period (assumed to be the approximate time that a person spends at a single household location). OEHHA recommends this risk be bracketed with nine-year and 70-year exposure periods and that HRA should be limited to the period/duration of activities associated with the project (OEHHA 2015).

The maximum on-site $PM_{2.5}$ emissions, which are used to represent DPM emissions for this analysis, would occur during site preparation and grading activities. While site preparation and grading emissions represent the worst-case condition, such activities would only occur for approximately two months, which represents less than one percent of the typical health risk calculation periods of 9 years, 30 years, and 70 years. $PM_{2.5}$ emissions would decrease for the remaining construction period because construction activities such as building construction and paving would require less construction equipment. Therefore, given the aforementioned, DPM generated by project construction is not expected to create conditions where the probability that the Maximally Exposed Individual would contract cancer is greater than ten in one million or to generate ground-level concentrations of non-carcinogenic TACs that exceed a Hazard Index greater than one for the Maximally Exposed Individual. The EPA SCREEN3 model, the screening air dispersion modeling method approved by the CARB for such assessments was used to estimate concentrations of DPM from the construction of the project. As shown in the Air Quality Analysis Report (Appendix A), the construction emissions would not exceed the SDCAPCD's health risk significance thresholds for cancer risk and chronic non-cancer hazard.

The project would not attract a substantial number of trips from large or heavy-duty vehicles that could generate mobile diesel emissions due to the passenger vehicle-serving nature of the proposed use. As previously described, the criteria pollutant emissions from the estimated project-related 138 vehicle trips per day and on-site area sources would all be far below their respective significant thresholds. Because the significance thresholds were developed with the intent to protect human health to the extent feasible, the results show that the proposed project would not expose existing nearby sensitive receptors to substantial pollutant burdens that would cause harmful effects.

As discussed in Section III(b), the proposed project would not result in construction or operational emissions that would exceed the County's SLTs for health risk. Thus, neither construction nor operation of the project would expose sensitive receptors to an incremental health risk.

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

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Less Than Significant Impact: SDAPCD Rule 51, commonly referred to as the public nuisance rule, prohibits emissions from any source whatsoever in such quantities of air contaminants or other material that cause injury, detriment, nuisance, or annoyance to the public health or damage to property. The potential for an operation to result in odor complaints from a "considerable" number of persons in the area would be considered a significant, adverse odor impact.

The project would involve the temporary use of diesel-powered construction equipment, which would generate exhaust that may be noticeable for short durations at adjacent properties. However, construction activities would be temporary, and construction emissions would not exceed San Diego County SLTs. The project will be constructed in phases and construction emissions and potential pollutants will be emitted over time due to the phasing of the project which will reduce concentrations of emissions.

The land use and industrial operations typically associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, refineries, landfills, dairies, and fiberglass molding. The proposed operations of the buildings and parking lot are not typically associated with objectionable odors.

Potential odor sources associated with the proposed project may result from construction equipment exhaust and the application of asphalt and architectural coatings during construction activities and the temporary storage of typical solid waste (refuse) associated with the proposed project's (long-term operational) uses. Standard construction requirements would minimize odor impacts from construction. The construction odor emissions would be temporary, short-term, and intermittent in nature, would cease upon completion of the respective phase of construction, and are thus considered less than significant.

During operation of the cemetery, no odors would be generated from interment of human remains that are casketed and buried in the ground. The casket is typically placed in a concrete outer enclosure (vault), which is covered with two feet of soil. The entombment of casketed remains does not create odors. The exhaust from grave preparation and landscape maintenance equipment would potentially generate odors, but these would be used intermittently at a large distance from nearby residents and therefore would not likely result in an odor impact. In addition, it is expected that project-generated refuse would be stored in covered containers and removed at regular intervals in compliance with the County's solid waste regulations. No odor emissions would occur.

The proposed project would also be required to comply with SDCAPCD Rule 51 to prevent occurrences of public nuisances. Therefore, potential odors associated with the proposed project construction and operation would be less than significant.

IV. BIOLOGICAL RESOURCES.

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

☐ Potentially Significant Impact	☐ Less than Significant Impact
☒ Less Than Significant With Mitigation Incorporated	☐ No Impact

Discussion/Explanation: A Biological Resources Letter Report was prepared for the project by LSA Associates, dated October 2021 (Appendix B). The biological survey area includes the project site plus a 100-foot survey buffer. The following responses have incorporated the analysis from the report.

Less than Significant with Mitigation Incorporated: The Biological Resources Letter Report determined that the project site consists of urban/developed land and disturbed habitat (nonnative, weedy annual species, and unvegetated areas occupied by clusters of unplanted nursery container plants). Outside the project site, but within the 100-foot survey buffer, there is nonnative riparian and Arundo-dominated riparian vegetation. Three ephemeral earthen drainage features occur in the northern half of the survey area but outside the project site.

There are no special-status plant species with a moderate or high potential to occur within the project site, based on the results of the database records search of a 2-mile radius around the biological survey area, observations made during the pedestrian survey and rare plant survey, and the absence of suitable habitat on site. No special-status plant species were observed during the pedestrian survey. Therefore, the project will not have a substantial adverse effect on special-status plant species.

No special-status animal species were observed during the pedestrian survey. However, the following special-status species have a moderate potential to occur within the biological survey area, based on the results of the database records search of a 2-mile radius and observations made during the pedestrian survey: Cooper's hawk (*Accipiter cooperi*), sharp-shinned hawk (*Accipiter striatus*), red-shouldered hawk (*Buteo lineatus*), turkey vulture (*Cathartes aura*), hoary bat (*Lasiurus cinereus*), and western yellow bat (*Lasiurus xanthinus*). Raptors have the potential to forage within the biological survey area and to nest in trees along the edges of the biological survey area. In addition, migratory birds have the potential to forage and nest in vegetation within the biological survey area. Because Cooper's hawk, sharp-shinned hawk, red-shouldered hawk, and turkey vulture are categorized as Group 1 animal species on the County's Sensitive Animal List, and because development of the project site would result in the loss of functional foraging habitat for these species and other raptors, the project will have a substantial adverse effect on raptor species.

Temporary and permanent impacts to foraging and nesting habitat for these species and other bird species that are not considered special-status but are protected by the California Fish and Game Code and the Migratory Bird Treaty Act, are expected to occur. If project-related activities are conducted during the typical bird breeding season (February 1 through August 31), these activities could affect individual birds, breeding activities, and active nests directly or indirectly (e.g., noise and fugitive dust). As such, MM BIO-1 would require that a qualified biologist perform a pre-construction nesting bird survey in suitable nesting habitat prior to the commencement of construction to avoid impacts to nesting birds. The contractor should create and implement a plan to minimize fugitive dust, which will reduce indirect impacts to birds. If active bird nests are identified during the pre-construction nesting bird survey, then a qualified biologist should establish an adequate buffer zone in which construction activities are prohibited until the nest is no longer active. If the species is federally or State-listed as threatened or endangered, then consultation with the USFWS and CDFW will be required for direction on appropriate buffer zone radius. If the species is not federally or State-listed as threatened or endangered, then the size of the buffer zone will be determined by the qualified biologist based on the amount, intensity, and duration of construction, and can be altered based on site conditions.

Additionally, clearing/disturbance of trees within the biological survey area has the potential to affect these foliage-roosting bat species directly through the loss of suitable roosting habitat. Furthermore, these species could be indirectly affected by impacts associated with activities that generate high amounts of vibration, noise, or possible night lighting. Because western yellow bat is a California Species of Special Concern, and because development of this project would result in the loss of suitable roosting habitat for this species and other foliage-roosting bat species, the project will have a substantial adverse effect on bat species. As such, MM BIO-2 would require that a qualified biologist perform a pre-construction bat survey in suitable roosting habitat prior to the commencement of construction to avoid impacts to foliage-roosting bats. If special-status

bats are identified during the pre-construction survey, then a qualified biologist should establish an adequate buffer zone in which construction activities are prohibited until the bats can be evicted. Removal of special-status bats will require consultation with the CDFW. Because these bat species are not on included in Group I or II of the County's Sensitive Animal List, the project will not have a substantial adverse effect on special-status bat species.

Botta's pocket gopher (*Thomomys bottae*) burrows were observed throughout the western half of the site, where the ground was less compacted. No large mammals were observed, although there is the potential for coyote (*Canis latrans*) to occur within the biological survey area. It is anticipated that any wildlife within the project site will be displaced. Indirect impacts to adjacent areas may result from noise and dust generated by construction-related activities, which have the potential to disturb nearby wildlife and, in the case of dust, vegetation. Additionally, while not anticipated, if construction is performed at night, lighting has the potential to indirectly affect wildlife.

Based on the determinations of the Biological Resources Letter Report (Appendix B), no designated critical habitat for special-status wildlife species exists at the project site. Sensitive biological resources on site include trees and other structures suitable for nesting birds. Given the potential for urban-adapted birds to nest within the ornamental trees and shrubs on-site, MM BIO-1 is recommended to avoid potential impacts to nesting birds from implementation of the project. With implementation of MM BIO-1, project impacts to species identified as a candidate, sensitive, or special status species would be less than significant.

b) Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?

☐	Potentially Significant Impact	☒	Less than Significant Impact
☐	Less Than Significant With Mitigation Incorporated	☐	No Impact

Less than Significant Impact: The project is in an area designated as outside of Pre-Approved Mitigation Area (PAMA) within the Draft North County Multiple Species Conservation Plan (MSCP) Area. The project site is located in an urbanized setting, as residential and commercial development surrounds the project site. However, the biological survey area is approximately 1.25 miles east and 0.75 mile north of Carlsbad Highlands Ecological Reserve and Dawson Los Monos Canyon Reserve, respectively. As described above, the project site consists of urban/developed land and disturbed habitat (Table 6). Developed land within the biological survey area refers to residential development and associated landscaping. The areas of the biological survey area consisting of disturbed habitat were dominated by routinely mowed nonnative, weedy annual species including tocalote (*Centaurea melitensis*), short-pod mustard (*Hirschfeldia incana*), wild radish (*Raphanus sativus*), fennel (*Foeniculum vulgare*), Hottentot fig (*Carpobrotus edulis*), and garland daisy (*Glebionis coronaria*). The native annual species fascicled tarweed (*Deinandra fasciculata*) was also present in this vegetation community. This vegetation community also includes areas with potted nursery container plants (small shrub species and tree species) or temporary buildings containing plants (e.g., greenhouses). Three ephemeral drainages and a depression present at the northern half of the biological survey area were vegetated with nonnative annual upland vegetation; however, a few hydrophytic plants, including Mexican fan palm (*Washingtonia robusta*), mule fat (*Baccharis salicifolia*), curly dock

(*Rumex crispus*), and Goodding's black willow (*Salix goodingii*), are sparsely scattered along the drainages and in the depression.

Outside the project site, but within the 100-foot survey buffer, there is nonnative riparian and Arundo-dominated riparian vegetation (Table 6). Nonnative riparian occurs outside of the project site, but within the 100-foot survey buffer. It occurs west of and adjacent to the northern drainage (Feature 3) and consists of a densely vegetated thicket of sweet gum (*Eucalyptus sp.*) trees. The proposed project is not expected to directly or indirectly affect the nonnative riparian habitat. Arundo-dominated riparian, which is a subset of the nonnative riparian category, occurs outside of the project site, but within the 100-foot survey buffer. It occurs downstream of and adjacent to the western terminus of the southern drainage (Feature 2) and consists of a dense patch of giant reed (*Arundo donax*). This vegetation community is considered a Resource Protection Ordinance (RPO) Wetland due to a predominance of giant reed, a hydrophytic plant species. Although this Arundo-dominated riparian is located outside of the project site, the potential remains for indirect impacts to this sensitive vegetation community. An open space easement with appropriate open space signage and/or fencing and a County-required 100-foot limited building zone easement would be established to protect the Arundo-dominated riparian habitat/RPO Wetland (see Section IV[c] for further discussion of potential impacts to this RPO Wetland).

Table 6. Vegetation Communities within in the Biological Survey Area and Project Site

Vegetation Communities	Acreage within the Biological Survey Area	Acreage within the Project Site
Nonnative Riparian	0.09	-
Arundo-dominated Riparian	0.12	-
Disturbed Habitat	17.77	13.57
Developed Land	6.77	0.88
Total Acres[1]	**24.75**	**14.45**

Notes: [1] Total may not sum due to rounding.

Disturbed habitat and developed land are of low biological value and are not considered RPO Sensitive Habitat according to the County Guidelines and they are not considered sensitive by State or Federal agencies and have low conservation value.

Construction of this project would result in permanent loss of disturbed habitat and developed land. Permanent loss involves long-term impacts associated with permanent features consisting of an administrative office, a gatehouse, landscaping, internal circulation system, and utility improvements. Direct impacts to disturbed habitat will result from permanent clearing of vegetation. Direct impacts to developed land will result from road improvements. Impacts to developed land and disturbed habitat would not result in a substantial adverse effect on any riparian habitat or other sensitive natural community. Therefore, impacts would be less than significant.

c) Would the project have a substantial adverse effect on state or federally protected wetlands defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

☐ Potentially Significant Impact ☒ Less than Significant Impact

☐ Less Than Significant With Mitigation Incorporated ☐ No Impact

Less Than Significant Impact: The Biological Resources Letter Report determined that there are three ephemeral drainage features in the biological survey area potentially subject to regulation by the U.S. Army Corps of Engineers (USACE), RWQCB, CDFW, and County. The Biological Resources Letter Report noted that functions and values for these drainage features were determined to have low significance in terms of resources.

Feature 1 consists of an ephemeral drainage vegetated predominantly by nonnative annual upland vegetation. Due to the absence of a predominance of hydrophytic vegetation, hydric soils, and wetland hydrology, Feature 1 is not considered wetland waters of the U.S. However, because Feature 1 displays a visible ordinary high water mark (OHWM) and conveys flows to Feature 2, which has a direct connection to the Pacific Ocean, this feature is considered nonwetland waters of the U.S. potentially subject to the jurisdiction of the USACE pursuant to the Clean Water Act (CWA). The streambed and banks associated with this feature are potentially subject to CDFW and RWQCB (nonwetland waters of the State) jurisdiction. Due to the absence of a predominance of hydrophytic vegetation, hydric soils, and a nonsoil substratum, Feature 1 does not meet the criteria for RPO Wetland.

Feature 2 consists of an ephemeral drainage that widens to a vegetated depression near the western end and then narrows again before exiting the project site and conveying flows into a dense patch of Arundo-dominated riparian vegetation. Feature 2 begins in the eastern half of the biological survey area and appears to convey flows from the adjacent nursery in a northwesterly direction. Due to the absence of a predominance of hydrophytic vegetation (except for the Arundo-dominated riparian vegetation, which is dominated by giant reed, a hydrophytic plant species), hydric soils, and wetland hydrology, Feature 2 is not considered a wetland water of the U.S. However, because Feature 2 displays a visible OHWM and conveys flows to a concrete storm drain structure, which has a direct connection to the Pacific Ocean, this feature is considered nonwetland waters of the U.S. potentially subject to the jurisdiction of the USACE pursuant to the CWA. The streambed and banks associated with this feature are potentially subject to CDFW and RWQCB (nonwetland waters of the State) jurisdiction. Due to the absence of a predominance of hydrophytic vegetation, hydric soils, and a non-soil substratum, most of Feature 2 does not meet the criteria for RPO Wetland. However, the *Arundo*-dominated riparian vegetation at the western end of Feature 2 meets the criteria for RPO Wetland because the dominant species is a hydrophyte.

Feature 3 consists of an ephemeral drainage vegetated predominantly by nonnative annual upland vegetation. The feature is in the northern quarter of the biological survey area and conveys flows from upstream sources (earthen and concrete ditches and runoff) through the biological survey area in a northwesterly direction before making a sharp southerly turn and converging into Feature 2. Due to the absence of a predominance of hydrophytic vegetation, hydric soils, and wetland hydrology, Feature 3 is not considered wetland waters of the U.S. However, because Feature 3 displays a visible OHWM and conveys flows to a concrete storm drain structure after converging with Feature 2, which has a direction connection to the Pacific Ocean, this feature is considered nonwetland waters of the U.S. potentially subject to the jurisdiction of the USACE pursuant to the CWA. The streambed and banks associated with this feature are potentially subject to CDFW and RWQCB (nonwetland waters of the State)

jurisdiction. Due to the absence of a predominance of hydrophytic vegetation, hydric soils, and a non-soil substratum, Feature 3 does not meet the criteria for RPO Wetland.

Additionally, an RPO Wetland is located within the biological survey area adjacent to the northeast project boundary but outside the project site. A County-required 50-foot buffer around the RPO Wetland encompasses approximately 0.15 acre of the project site. The Biological Resources Letter Report determined that construction of the project would not affect the RPO Wetland or its buffer. To protect the RPO Wetland buffer, the project would establish an open space easement around the 50-foot buffer, including installation of appropriate open space signage and/or fencing. Additionally, a County-required 100-foot limited building zone easement would be established around the RPO Wetland buffer and open space easement.

Due to their locations within the project site, Features 1 and 2 are expected to be permanently affected by project-related activities (Table 7). Both features are subject to regulation by the USACE, CDFW, and RWQCB. MM BIO-3 would require mitigation impacts to potentially jurisdictional streambeds and banks through purchase of off-site mitigation bank credits. Impacts and anticipated mitigation requirements for potential CDFW jurisdiction would be the same as those for potential waters of the State. Impacts to aquatic resources would require review by the resource agencies. The resource agencies will likely require the following permits: a Corps Section 404 Nationwide Permit, an RWQCB Section 401 water quality certification, and a CDFW Streambed Alteration Agreement. The quantity and source of mitigation bank credits would be determined after consultation with the resource agencies.

Table 7. Impacts and Mitigation for Potential Nonwetland Waters of the U.S. and State[1]

Feature	Linear Feet	Nonwetland Waters of the U.S.	Anticipated Mitigation Ratio	Anticipated Mitigation Required (acres)[2]	Nonwetland Waters of the State	Anticipated Mitigation Required (acres)[2]
1	292	0.01	2:1	0.02	0.01	0.02
2	867	0.18	2:1	0.36	0.21	0.42
3	-	-	-	-	-	-
Total[3]	**1,159**	**0.19**	**2:1**	**0.38**	**0.22**	**0.44**

Notes: [1] No wetlands are within the project site and there would be no impacts to wetland waters.
[2] Due to the disturbed nature and low functions and values of the drainage features on site, the Biolgocal Resources Letter Report estimates that a 2:1 mitigation to impact ratio will satisfy the mitigation requirements for impacts to waters of the U.S., waters of the States, and jurisdictional streambeds and banks. However, the project applicant will consult with representatives from the USACE, CDFW, and RWQCB to determine the appropriate mitigation for permanent impacts to drainage features.
[3] Total may not sum due to rounding.

The preparation of a Stormwater Pollution Prevention Plan (SWPPP) and associated best management practices (BMPs) would occur in accordance with the General Construction Permit for stormwater discharges to avoid indirect effects to downstream drainages (see Section X[a]). Additionally, project construction activities would occur in accordance with the County's Grading Ordinance to avoid erosion and sedimentation impacts on the ephemeral drainages. Therefore, potentially significant impacts to wetlands or waters of the U.S. as defined by Section 404 of the Clean Water Act and under the jurisdiction of the USACE would be reduced to less than significant with implementation of MM BIO-3.

The project would mitigate potential impacts to state or federally protected wetlands and thus, would not contribute to a cumulative impact for such habitats.

d) Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Less Than Significant Impact: The Biological Resources Letter Report determined that the biological survey area provides minimal function as a wildlife corridor or linkage because it is disturbed and surrounded by residential and commercial development, including roads, which restrict wildlife movement through the general area. Due to the existing developed nature of the site the proposed project would not contribute to impeding wildlife movement or the use of native wildlife nursery sites. Furthermore, the off-site RPO Wetland is fed by off-site irrigation and runoff and does not connect to a significant riparian corridor. The RPO Wetland itself provides minimal function as a wildlife corridor due to the location of a chain-link fence and the high density of the giant reed. Therefore, impacts would be less than significant.

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

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less than Significant Impact
☒ No Impact

No Impact: The project site is located in the Draft North County MSCP Area. This plan does not identify the project site as being subject to habitat conservation. The proposed expansion of the existing development on the project site would therefore be in compliance with this or any other future habitat conservation plan insofar as all project impacts are mitigated to less than significant levels. Impacts to urban/developed land cover and disturbed habitat vegetation community types that occur within the project site do not have a grouping of ten or more individual plant species and do not require mitigation per the County's Biological Mitigation Ordinance. The project site does not contain any native or sensitive vegetation communities; therefore, future development at the site is not expected to conflict with the conservation goals of the MSCP, previously defined, nor any other local, regional, or state habitat conservation plan. Impacts to jurisdictional non-wetland waters would be mitigated to below a level of significance. Therefore, no impact would occur.

The cumulative study area includes the section of the Draft North County MSCP Area as well as portions of lands within the City of Carlsbad's Habitat Management Plan to the west, lands within the City of Oceanside Subarea Plan to the north, and lands within the City of Escondido's Multiple Habitat Conservation Program Subarea Plan and the City of San Diego's MSCP Subarea Plan to the east. The purpose of these habitat conservation programs is to take a broad-

based ecosystem approach to planning for the protection and perpetuation of biological diversity, which is the most appropriate way to assess and address the potential cumulative impacts stemming from multiple projects in the same geographic area. These programs focus on the long-term stability of wildlife and plant communities and include key interests in the process. These programs identify and provide for the regional protection of plants, animals, and their habitats while allowing compatible and appropriate economic activity. Potential impacts to sensitive habitats and associated species have been addressed in a regional context through these programs. Pending and future projects would also be required to comply with the regional habitat conservation programs, such as the County MSCP, which would address project-specific impacts and appropriate mitigation to offset cumulative impacts to a less than significant level.

Mitigation Measures

BIO-1 Raptor species have the potential to forage within the biological survey area and to nest in trees along the edges of the biological survey area. Therefore, the following measures are required as conditions of project approval to maintain compliance with the California Fish and Game Code and Migratory Bird Treaty Act with respect to nesting and foraging birds:

- A qualified biologist shall perform a pre-construction nesting bird survey in suitable nesting habitat prior to the commencement of construction to avoid impacts to nesting birds. If active bird nests are identified during the pre-construction nesting bird survey, then a qualified biologist should establish an adequate buffer zone in which construction activities are prohibited until the nest is no longer active.
- If the species is not federally or State-listed as threatened or endangered, then the size of the buffer zone will be determined by the qualified biologist based on the amount, intensity, and duration of construction, and can be altered based on site conditions.
- The contractor should create and implement a plan to minimize fugitive dust, which will reduce indirect impacts to birds. If the species is federally or State-listed as threatened or endangered, then consultation with the USFWS and CDFW will be required for direction on appropriate buffer zone radius.

BIO-2 Clearing/disturbance of trees within the biological survey area has the potential to affect foliage-roosting bat species directly through the loss of suitable roosting habitat. Furthermore, these species could be indirectly affected by impacts associated with activities that generate high amounts of vibration, noise, or possible night lighting. Therefore, the following measures are required as conditions of project approval:

- A qualified biologist shall perform a pre-construction bat survey in suitable roosting habitat prior to the commencement of construction to avoid impacts to foliage-roosting bats. If special-status bats are identified during the pre-construction survey, then a qualified biologist should establish an adequate buffer zone in which construction activities are prohibited until the bats can be evicted.
- Removal of special-status bats will require consultation with the CDFW.

BIO-3 The project has the potential to impact jurisdictional wetlands and waterways during construction of Phase 2 of the development. Therefore, the following agency permits or verification that they are not required shall be obtained:

a. A Clean Water Act, Section 401/404 permit issued by the California Regional Water Quality Control Board and the U.S. Army Corps of Engineers for all project related disturbances of waters of the U.S. and/or associated wetlands.

b. A Section 1602 Streambed Alteration Agreement issued by the California Department of Fish and Wildlife for all project related disturbances of any streambed.

BIO-4 In order to protect sensitive biological resources, pursuant to the Resource Protection Ordinance (RPO), a biological open space easement shall be granted. Grant to the County of San Diego an open space easement, as shown on the approved Plot Plan. This easement is for the protection of biological resources and prohibits all of the following on any portion of the land subject to said easement: grading; excavation; placement of soil, sand, rock, gravel, or other material; clearing of vegetation; construction, erection, or placement of any building or structure; vehicular activities; trash dumping; or use for any purpose other than as open space

V. CULTURAL RESOURCES.

a) Would the project cause a substantial adverse change in the significance of a historical resource pursuant to 15064.5?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Discussion/Explanation: A Cultural Resources Survey Report was prepared for the project by LSA Associates, dated September 27, 2023 (Appendix C). As part of the Cultural Resources Report prepared for the project, a records search, a Sacred Lands File search, and pedestrian field survey of the property were conducted. The following responses have incorporated the analysis from the report.

Less Than Significant Impact: No prehistoric resources were identified as part of the pedestrian survey completed for this project. The existing buildings on the project site are not recommended eligible for listing in the National Register of Historic Places or California Register of Historical Resources or for designation to the County of San Diego Historic Register, and therefore are not considered a historical resource as defined by CEQA. Because the resources are not considered significant historic resources pursuant to CEQA Guidelines §15064.5, loss of these resources cannot contribute to a potentially significant impact. The existing buildings on-site were constructed in the 1950s and have been modified and therefore are not considered a historic resource. Existing public views of the residence are limited and screened by vegetation along the roadway. Further, the California Historical Resources Information System records search and a review of County of San Diego Historic Register failed to identify any other cultural resources, including historic districts, within close proximity to the project site. The site nearest to the project area is P-37-004930, is located over 500 feet away from project site. The Cultural Resources Survey Report determined that based on the results of the records search and pedestrian survey of the area, the potential for a subsurface deposit is relatively low (Appendix C). Impacts would be less than significant.

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

☐ Potentially Significant Impact	☒ Less than Significant Impact
☒ Less Than Significant With Mitigation Incorporated	☐ No Impact

Less Than Significant Impact With Mitigation Incorporated: The Sacred Lands File search from the Native American Heritage Commission for the project was negative. The Native American Heritage Commission also provided the contact information for tribal contacts within the local community for additional consultation. A Native American Monitor from Saving Sacred Sites from the San Luis Rey Band of Mission Indians was invited to participate in the pedestrian survey of the project area. The Cultural Resources Survey Report determined that based on the results of the records search and pedestrian survey of the area, the potential for a subsurface deposit is relatively low and monitoring was not recommended (Appendix C).

In accordance with AB 52 Tribal Consultation, County Staff and the applicant received requests to include tribal and archaeological monitoring in order to ensure that potential archaeological resources would not be impacted during grading and construction operations. The project includes tribal and archaeological monitoring during ground disturbing activities such as during the Phase 1 Landscape Plan installation and the Phase 2 grading in order to allow for provisions of unanticipated discoveries of cultural resources during project implantation. With the incorporation of Mitigation Measures CUL-1 through CUL-4, impacts would be less than significant with mitigation.

c) Would the project disturb any human remains, including those interred outside of dedicated cemeteries?

☐ Potentially Significant Impact	☐ Less than Significant Impact
☒ Less Than Significant With Mitigation Incorporated	☐ No Impact

Less Than Significant with Mitigation Incorporated: Based on an analysis of records and a survey of the property by LSA Associates (Appendix C), it has been determined that the project is not likely disturb any human remains because the project site does not include a formal cemetery or any archaeological resources that might contain interred human remains**.** In the unlikely event that human remains are encountered onsite during earth-disturbing activities, MM CUL-1 through CUL-4 would ensure that state and federal laws and regulations regarding human remains (i.e., Public Resources Code §5097.98, CEQA Guidelines §15064.5 and Health & Safety Code §7050.5) are followed. With implementation of MM CUL-1, potential impacts to disturbance of human remains would be less than significant.

Mitigation Measures

CUL-1 Prior to any clearing, grubbing, trenching, grading, or any land disturbances, the County-approved Project Archaeologist and Luiseño Native American Monitor shall attend the pre-construction meeting with the contractors to explain and coordinate the requirements of the archaeological monitoring program. The Project Archaeologist and Luiseño Native American Monitor shall monitor the original cutting of previously

undisturbed deposits in all areas identified for development including off-site improvements. The Project Archaeologist and Luiseño Native American monitor shall also evaluate fill soils to determine that they are clean of cultural resources. The archaeological monitoring program shall comply with the County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements for Cultural Resources. The applicant shall have the contracted Project Archeologist and Luiseño Native American attend the preconstruction meeting to explain the monitoring requirements. The Department of Public Works, Private Development Construction Inspection shall confirm the attendance of the approved Project Archaeologist.

CUL-2 The Project Archaeologist and Luiseño Native American Monitor shall monitor the original cutting of previously undisturbed deposits in all areas identified for development including off-site improvements. The archaeological monitoring program shall comply with the following requirements during earth-disturbing activities:

a. **Monitoring.** During the original cutting of previously undisturbed deposits, the Project Archaeologist and Luiseño Native American Monitor shall be onsite as determined necessary by the Project Archaeologist. Inspections will vary based on the rate of excavation, the materials excavated, and the presence and abundance of artifacts and features. The frequency and location of inspections will be determined by the Project Archaeologist in consultation with the Luiseño Native American Monitor. Monitoring of the cutting of previously disturbed deposits will be determined by the Project Archaeologist in consultation with the Luiseño Native American Monitor.
b. **Inadvertent Discoveries.** In the event that previously unidentified potentially significant cultural resources are discovered:
    1. The Project Archaeologist or the Luiseño Native American monitor shall have the authority to divert or temporarily halt ground disturbance operations in the area of discovery to allow evaluation of potentially significant cultural resources.
    2. At the time of discovery, the Project Archaeologist shall contact the PDS Staff Archaeologist.
    3. The Project Archaeologist, in consultation with the PDS Staff Archaeologist and the Luiseño Native American Monitor, shall determine the significance of the discovered resources.
    4. Construction activities will be allowed to resume in the affected area only after the PDS Staff Archaeologist has concurred with the evaluation.
    5. Isolates and clearly non-significant deposits shall be minimally documented in the field. Should the isolates and/or non-significant deposits not be collected by the Project Archaeologist, then the Luiseño Native American monitor may collect the cultural material for transfer to a Tribal Curation facility or repatriation program.
    6. If cultural resources are determined to be significant, a Research Design and Data Recovery Program (Program) shall be prepared by the Project Archaeologist in consultation with the Luiseño Native American Monitor. The County Archaeologist shall review and approve the Program, which shall be carried out using professional archaeological methods. The Program shall include (1) reasonable efforts to preserve (avoidance) “unique” cultural resources or Sacred Sites; (2) the capping of identified Sacred Sites or unique cultural resources and placement of development over the cap, if avoidance is

infeasible; and (3) data recovery for non-unique cultural resources. The preferred option is preservation (avoidance).

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

d. **Fill Soils.** The Project Archaeologist and Luiseño Native American monitor shall evaluate fill soils to determine that they are clean of cultural resources.

e. **Monthly Reporting.** The Project Archaeologist shall submit monthly status reports to the Director of Planning and Development Services starting from the date of the Notice to Proceed to termination of implementation of the archaeological monitoring program. The report shall briefly summarize all activities during the period and the status of progress on overall plan implementation. Upon completion of the implementation phase, a final report shall be submitted describing the plan compliance procedures and site conditions before and after construction.

   The Department of Public Works, Private Development Construction Inspection shall make sure that the Project Archeologist is on-site performing the monitoring duties of this condition. The Department of Public Works, Private Development Construction Inspection shall contact the Planning & Development Services, Project Planning Division if the Project Archeologist or applicant fails to comply with this condition.

CUL-3 Upon completion of all earth-disturbing activities, and prior to Rough Grading Final Inspection (Grading Ordinance SEC 87.421.a.2) and issuance of any building permit, the Project Archaeologist shall prepare one of the following reports upon completion of the earth-disturbing activities that require monitoring:

a. **No Archaeological Resources Encountered.** If no archaeological resources are encountered during earth-disturbing activities, then submit a final Negative Monitoring Report substantiating that earth-disturbing activities are completed and no cultural resources were encountered. Archaeological monitoring logs showing

the date and time that the monitor was on site and any comments from the Native American Monitor must be included in the Negative Monitoring Report.

b. **Archaeological Resources Encountered.** If archaeological resources were encountered during the earth disturbing activities, the Project Archaeologist shall provide an Archaeological Monitoring Report stating that the field monitoring activities have been completed, and that resources have been encountered. The report shall detail all cultural artifacts and deposits discovered during monitoring and the anticipated time schedule for completion of the curation and/or repatriation phase of the monitoring.

   The applicant shall submit the Archaeological Monitoring Report to Planning & Development Services, Project Planning Division for review and approval. Once approved, a final copy of the report shall be submitted to the South Coastal Information Center and any culturally affiliated Tribe who requests a copy. Planning & Development Services, Project Planning Division shall review the report or field monitoring memo for compliance with the project MMRP, and inform Department of Public Works, Private Development Construction Inspection that the requirement is completed.

CUL-4 Prior to any occupancy, final grading release, or use of the premises in reliance of this permit, the Project Archaeologist shall prepare a final report that documents the results, analysis, and conclusions of all phases of the Archaeological Monitoring Program if cultural resources were encountered during earth-disturbing activities. The report shall include the following, if applicable:

a. Department of Parks and Recreation Primary and Archaeological Site forms.
b. Daily Monitoring Logs
c. Evidence that all cultural materials have been conveyed as follows:
   1. Evidence that all prehistoric materials collected during the archaeological monitoring program have been submitted to a San Diego curation facility or a culturally affiliated Native American Tribal curation facility that meets federal standards per 36 CFR Part 79, and, therefore, would be professionally curated and made available to other archaeologists/researchers for further study. The collections and associated records, including title, shall be transferred to the San Diego curation facility or culturally affiliated Native American Tribal curation facility and shall be accompanied by payment of the fees necessary for permanent curation. Evidence shall be in the form of a letter from the curation facility stating that the prehistoric archaeological materials have been received and that all fees have been paid.
      or
      Evidence that all prehistoric materials collected during the grading monitoring program have been repatriated to a Native American group of appropriate tribal affinity and shall be accompanied by payment of the fees necessary, if required. Evidence shall be in the form of a letter from the Native American tribe to whom the cultural resources have been repatriated identifying that the archaeological materials have been received.
   2. Historic materials shall be curated at a San Diego curation facility and shall not be curated at a Tribal curation facility or repatriated. The collections and associated records, including title, shall be transferred to the San Diego curation facility and shall be accompanied by payment of the fees necessary

for permanent curation. Evidence shall be in the form of a letter from the curation facility stating that the historic materials have been received and that all fees have been paid.

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

The applicant's archaeologist shall prepare the final report and submit it to Planning & Development Services, Project Planning Division for approval. Once approved, a final copy of the report shall be submitted to the South Coastal Information Center (SCIC) and any culturally affiliated Tribe who requests a copy. Planning & Development Services, Project Planning Division shall review the final report for compliance with this condition and the report format guidelines. Upon acceptance of the report, Planning & Development Services, Project Planning Division shall inform Planning & Development Services, Land Development Review and Department of Public Works, Private Development Construction Inspection, that the requirement is complete, and the bond amount can be relinquished. If the monitoring was bonded separately, then Planning & Development Services, Project Planning Division shall inform Planning & Development Services *or* Department of Public Works, Fiscal Services to release the bond back to the applicant.

VI. ENERGY.

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

☐	Potentially Significant Impact	☒	Less than Significant Impact
☐	Less Than Significant With Mitigation Incorporated	☐	No Impact

Less Than Significant Impact: The project would result in the use of electricity, natural gas, petroleum, and other consumption of energy resources during both the construction and operation phases of the project; however, the consumption is not expected to be wasteful, inefficient, or unnecessary for the following reasons.

During construction, the project would require the use of heavy construction equipment that would be fueled by gas and diesel. However, the energy use would be temporary, limited, and cease upon completion of construction activities. Construction would be conducted in compliance with local, state, and federal regulations (e.g., United States Environmental Protection Agency [USEPA] and the CARB engine emission standards, which require highly efficient combustion systems that maximize fuel efficiency and reduce unnecessary fuel consumption, and limitations on engine idling times). Compliance with these regulations would minimize short-term energy demand during the project's grading to the extent feasible.

In addition, all new construction would be required to comply with the energy code in effect at the time of construction, which ensures efficient building construction. The project

would also be required to comply with Title 24 energy standards for energy efficiency. Project design features that would result in lower energy use include low-flow plumbing fixtures, efficient water usage, recycling, and composting, and landscaping with climate adapted plants that require little-to-no water. Additionally, the applicant proposes to install solar photovoltaic (PV) panels on the proposed administrative office, which would minimize the electricity demand from the power grid. Additionally, Phase 1 of the project would reuse all existing structures on-site and Phase 2 of the project would renovate and reuse the existing residence on-site as an administrative office. The project does not include the use of natural gas. Therefore, the project would limit the construction-related energy use needed to construct a new office. Therefore, the construction and operation of the project is not expected to result in the wasteful or inefficient use of energy, and impacts would be less than significant.

The proposed project would use only the amount of energy necessary for the construction and operation of the proposed cemetery that is typical of this type of development. The proposed project would be consistent with the General Plan land uses and SANDAG growth projections with the Major Use Permit. The proposed residences would also include rooftop solar systems to generate renewable energy and energy efficient features as described further in Section VI(b) below. Therefore, the project would not result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.

b) Would the project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Less Than Significant Impact: The project would be required to implement renewable energy and energy efficiency measures as required by state law and county sustainability measures, including but not limited to:

- Low-flow plumbing fixtures.
- A high-reflectivity cool roof.
- Incorporation of Title 24 energy standards.
- Landscaping in compliance with the County's Water Conservation in Landscaping Ordinance.
- Construction and demolition recycling in compliance with County Ordinance Section 68.511 through 68.520 (Diversion of Construction and Demolition Materials from Landfill Disposal).
- Composting in compliance with the County’s Strategic Plan to Reduce Waste (2017).
- High-efficiency LED street and area lighting.
- Solar PV provisions.

- EV charging spaces in compliance with EV requirements in the most recently adopted version of CALGreen.

See Section VIII, Greenhouse Gas Emissions, for a detailed list of the project design features that would be incorporated into the project to reduce energy demand. Therefore, the project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

VII. GEOLOGY AND SOILS.

a) Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Less Than Significant Impact: The project site is not located on or in proximity to any known active or potentially active fault traces. Other active fault zones in the region that could possibly affect the project site include the Elsinore Fault Zone (California Department of Conservation 2022). Due to the distance of these faults from the project site, project construction would not result in substantial adverse effects from ground surface rupture at any of these faults. Therefore, impacts would be less than significant.

ii. Strong seismic ground shaking?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Less Than Significant Impact: To ensure the structural integrity of the proposed buildings, the project must conform to the Seismic Requirements as outlined within the California Building Code and the County Code. The County Code requires a soils compaction report with proposed foundation recommendations to be approved before the issuance of a building permit. The project grading also must conform to the grading requirements outlined in the County Grading Ordinance and be verified in the field by a licensed or registered Civil Engineer and inspected by County Grading Inspectors. Therefore, compliance with the Grading Plan, Geotechnical Investigation prepared by the registered Civil Engineer, Grading Ordinance, California Building Code, and the County Code would ensure the project would not result in a potentially significant impact from the exposure of people or structures to potential adverse effects from strong seismic ground shaking.

iii. Seismic-related ground failure, including liquefaction?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Less Than Significant Impact: Liquefaction typically occurs when a site is located in a zone with seismic activity, onsite soils are cohesionless (such as sand or gravel), groundwater is encountered within 50 feet of the surface, and soil relative densities are less than about 70 percent. The project site is not within a “Potential Liquefaction Area” as identified in the County Guidelines for Determining Significance for Geologic Hazards. This indicates that the liquefaction potential at the site is low. In addition, the site is not underlain by poor artificial fill or located within a floodplain. Therefore, there would be a less than significant impact from the exposure of people or structures to adverse effects from a known area susceptible to ground failure, including liquefaction. In addition, since liquefaction potential at the site is low, earthquake-induced lateral spreading is not considered to be a seismic hazard at the site and impacts would be less than significant.

iv. Landslides?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Less Than Significant Impact: The project site is not within a low/generally susceptible category “Landslide Susceptibility Area" as identified in the County Guidelines for Determining Significance for Geologic Hazards. Landslide risk areas from the County’s Multi-Jurisdictional Hazard Mitigation Plan (MJHMP) were based on data including steep slopes (greater than 25 percent); soil series data (SANDAG based on U.S. Geologic Survey [USGS] 1970s series); soil-slip susceptibility from USGS; and Landslide Hazard Zone Maps (limited to the western portion of the County) developed by the California Department of Conservation, Division of Mines and Geology (DMG). Also included within Landslide Susceptibility Areas are gabbroic soils on slopes steeper than 15 percent in grade because these soils are slide prone. As described in Section II, Agriculture and Forestry Resources, the project site includes Basanko Clay, 9 to 15 percent slopes (BsD); Cienaba Coarse Sandy Loam, 5 to 15 percent slopes, eroded (CID2); Cienaba Coarse Sandy Loam, 15 to 30 percent slopes, eroded (CIE2); Fallbrook Sandy Loam, 15 to 30 percent slopes, eroded (FAE2); and Diablo Clay, 9 to 15 percent slopes, (DaD). The project site would be graded to be relatively flat, and there would be no habitable structures on-site. Therefore, the project would have a less than significant impact from the exposure of people or structures to potential adverse effects from landslides.

b) Would the project result in substantial soil erosion or the loss of topsoil?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Less Than Significant Impact: Construction of the project would include site grading, which has the potential to release sediment into downstream receiving waters. However, the project would not result in substantial soil erosion or the loss of topsoil for the following reasons:

- The project would not result in unprotected erodible soils.
- The project is not located in a floodplain.
- The project would be required to comply with the County's Grading Ordinance [San Diego County Code of Regulations, Title 8, Zoning and Land Use Regulations, Division 7, Sections 87.414 (DRAINAGE - EROSION PREVENTION) and 87.417 (PLANTING)]. Compliance with these regulations would minimize the potential for water and wind erosion.
- The project would implement BMPs described in the Priority Development Project (PDP) Storm Water Quality Management Plan (SWQMP) and Drainage Study prepared by Chang Consultants for the project (see Section X, Hydrology and Water Quality).
- All stormwater runoff from the project site would be conveyed to one of the two biofiltration basins included in the proposed project (see Section X, Hydrology and Water Quality).

Due to these factors, it has been found that the project would not result in substantial soil erosion or the loss of topsoil, and impacts would be less than significant.

c) Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in an on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Less Than Significant Impact: The project proposes the development of the existing site with a cemetery. Grading associated with the project would be required to conform to the grading requirements outlined in the County Grading, Clearing, and Watercourses Ordinance (Grading Ordinance) and be verified in the field by a licensed or registered Civil Engineer and inspected by County Grading Inspectors. In addition, a Soils Engineering Report is required as part of the Building Permit process to assure that the proposed buildings are adequately supported. This Report would evaluate the strength of underlying soils and make recommendations on the design of building foundation systems. The Soils Engineering Report must demonstrate that a proposed building meets the structural stability standards required by the California Building Code. The Report must be approved by the County prior to the issuance of a Building Permit. Therefore, the Grading Plan prepared by the registered Civil Engineer and compliance with the Grading Ordinance ensure the project would not result in a potentially significant impact related to landslide, lateral spreading, subsidence, liquefaction, or collapse. Therefore, impacts would be less than significant. For further information regarding landslides, liquefaction, and lateral spreading, refer to Section VII(a)(iii) through (iv) listed above.

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

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Less Than Significant Impact: The areas surrounding the project site are currently developed with existing structures. Additionally, there would be no habitable structures on-site. Therefore, the project would not create a substantial risk to life or property and impacts would be less than significant.

e) Would the project have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

☐ Potentially Significant Impact	☐ Less than Significant Impact
☐ Less Than Significant With Mitigation Incorporated	☒ No Impact

No Impact: The project would rely on public water and sewer for the disposal of wastewater. No septic tanks or alternative wastewater disposal systems are proposed. The project site currently contains an existing septic system below the ground service. Existing leach lines for the septic tank would be pumped and removed through applicable required permits from the Department of Environmental Health and Quality (see Section IX, Hazards and Hazardous Materials). Therefore, no impact would occur.

f) Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

☐ Potentially Significant Impact	☐ Less than Significant Impact
☒ Less Than Significant With Mitigation Incorporated	☐ No Impact

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

Less Than Significant Impact With Mitigation Incorporated: The site does not contain any unique geologic features that have been listed in the County's Guidelines for Determining Significance for Unique Geology Resources nor does the site support any known geologic characteristics that have the potential to support unique geologic features.

A review of the County's Paleontological Resources Maps and data on San Diego County's geologic formations indicates that the project is located on geological formations that have a high potential and sensitivity for paleontological resources. Since an impact to paleontological resources does not typically occur until the resource is disturbed, monitoring during excavation is the essential measure to mitigate potentially significant impacts to unique paleontological resources to a level below significance.

A monitoring program implemented by the excavation/grading contractor would be required under MM GEO-1. Equipment operators and others involved in the excavation shall watch for fossils during the normal course of their duties. In accordance with the Grading Ordinance, if a fossil or fossil assemblage of greater than twelve inches in any dimension is encountered during

excavation, all excavation operations in the area where the fossil or fossil assemblage was found shall be suspended immediately, the County shall be notified, and a Qualified Paleontologist shall be retained by the applicant to inspect the find to determine if it is significant. A Qualified Paleontologist is a person who has, to the satisfaction of the PDS Director:

- A Ph.D. or M.S. or equivalent in paleontology or closely related field (e.g., sedimentary or stratigraphic geology, evolutionary biology, etc.);
- Demonstrated knowledge of southern California paleontology and geology; and
- Documented experience in professional paleontological procedures and techniques.

If the Qualified Paleontologist determines that the fossil or fossil assemblage is significant; a mitigation program involving salvage, cleaning, and curation of the fossil(s) and documentation shall be implemented.

With the implementation of MM GEO-1 during project grading operations, potential impacts to paleontological resources would be less than significant. Furthermore, the project would not result in a cumulative impact to paleontological resources because other projects that require grading in sensitive paleontological resource areas would be required to have the appropriate level of paleontological monitoring and resource recovery. In addition, other projects that propose any amount of significant grading would be subject to the requirements for paleontological monitoring as required pursuant to the County's Grading Ordinance. Therefore, the project would not result in a significant direct, indirect, or cumulatively significant loss of paleontological resources.

Mitigation Measures

MM GEO-1 The grading contractor is responsible to monitor for paleontological resources during all grading activities. If any fossils are found greater than 12 inches in any dimension, all grading activities shall be halted and PDS shall be contacted before continuing grading operations.

If any paleontological resources are discovered and salvaged, the monitoring, recovery, and subsequent work determined necessary shall be completed by or under the supervision of a Qualified Paleontologist pursuant to the *San Diego County Guidelines for Determining Significance for Paleontological Resources*.

Upon completion of all grading activities, and prior to Rough Grading Final Inspection, one of the following letters shall be performed and submitted to PDS for review and approval:

If no paleontological resources were discovered, submit a "No Fossils Found" letter from the grading contractor to PDS stating that the monitoring has been completed and that no fossils were discovered, and including the names and signatures from the fossil monitors. The letter shall be in the format of Attachment E of the *County of San Diego Guidelines for Determining Significance for Paleontological Resources*.

If paleontological resources were encountered during grading, a letter shall be prepared stating that the field grading monitoring activities have been completed, and that

resources have been encountered. The letter shall detail the anticipated time schedule for completion of the curation phase of the monitoring.

VIII. GREENHOUSE GAS EMISSIONS.

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

☐ Potentially Significant Impact	☒ Less than Significant Impact
☐ Less Than Significant With Mitigation Incorporated	☐ No Impact

Discussion/Explanation: CalEEMod modeling was prepared for the project dated March 14, 2024 (Appendix D). It should be noted that this modeling was prepared more recently than the CalEEMod modeling conducted for preparation of the Air Quality Analysis Report and therefore, the results differ slightly. Additionally, the CalEEMod modeling does not incorporate development of the project in phases and does not take into account phased development over time that would result in emissions to be amortized and reduced. Given that the GHG modeling was prepared more recently, this data is less conservative and more accurate, as it takes into account more recent emissions factors, which generally improve over time. The following responses have incorporated the analysis from the report.

Greenhouse gas (GHG) emissions result in an increase in the earth's average surface temperature commonly referred to as global warming. This rise in global temperature is associated with long-term changes in precipitation, temperature, wind patterns, and other elements of the earth's climate system, known as climate change. These changes are now broadly attributed to GHG emissions, particularly those emissions that result from the human production and use of fossil fuels. GHGs include carbon dioxide, methane, halocarbons, and nitrous oxide, among others. Human induced GHG emissions are a result of energy production and consumption and personal vehicle use, among other sources.

Climate changes resulting from GHG emissions could produce an array of adverse environmental impacts including water supply shortages, severe drought, increased flooding, sea level rise, air pollution from increased formation of ground level ozone and particulate matter, ecosystem changes, increased wildfire risk, agricultural impacts, and ocean and terrestrial species impacts, among other adverse effects.

It should be noted that an individual project's GHG emissions would generally not result in direct impacts under CEQA, as the climate change issue is global in nature; however, an individual project could be found to contribute to a potentially significant cumulative impact.

CEQA Guidelines Section 15064.4 recommends that lead agencies quantify GHG emissions of projects and consider several other factors that may be used in the determination of significance of GHG emissions from a project, including the extent to which the project may increase or reduce GHG emissions; whether a project exceeds an applicable significance threshold; and the extent to which the project complies with regulations or requirements adopted to implement a plan for the reduction or mitigation of GHG emissions.

CEQA Guidelines Section 15064.4 does not establish a threshold of significance. Lead agencies have the discretion to establish significance thresholds for their respective jurisdictions, and in establishing those thresholds, a lead agency may appropriately look to thresholds developed by other public agencies or suggested by other experts, as long as any threshold chosen is supported by substantial evidence (see CEQA Guidelines Section 15064.7[c]). The CEQA Guidelines also clarify that the effects of GHG emissions are cumulative and should be analyzed in the context of CEQA's requirements for cumulative impact analysis (see CEQA Guidelines Section 15064.4[b]).

Per CEQA Guidelines Section 15064(h)(3), a project's incremental contribution to a cumulative impact can be found not cumulatively considerable if the project would comply with an approved plan or mitigation program that provides specific requirements that would avoid or substantially lessen the cumulative problem in the geographic area of the project. To qualify, such plans or programs must be specified in law or adopted by the public agency with jurisdiction over the affected resources through a public review process to implement, interpret, or make specific the law enforced or administered by the public agency. Examples of such programs include a "water quality control plan, air quality attainment or maintenance plan, integrated waste management plan, habitat conservation plan, natural community conservation plans [and] plans or regulations for the reduction of GHG emissions." Therefore, a lead agency can make a finding of "less than significant" for GHG emissions if a project complies with adopted programs, plans, policies, and/or other regulatory strategies to reduce GHG emissions.

The County of San Diego has developed a Climate Action Plan (CAP) that was adopted in September of 2024. The CAP implements climate actions that reduce GHG emissions and establish actions to achieve a goal of net zero carbon emissions by 2045. The CAP establishes emission reduction targets of 43.6 percent emissions reductions below 2019 levels by 2030 and 85.4 percent below 2019 levels by 2045. This CAP sets GHG reduction targets and a net zero goal in alignment with the 2022 Scoping Plan.

Less Than Significant Impact:
The subject project was originally submitted in 2020 prior to the adoption of CAP and the emissions and analysis for the project were evaluated prior to the adoption of CAP. In the absence of a CAP while the project was primarily in-process the project was evaluated for consistency with a project specific threshold for consistency with the 2022 CARB Scoping Plan and meeting State and County goals of emissions reductions by 2030 and 2045.

Estimated Construction-Related GHG Emissions
Construction of the project would generate temporary GHG emissions primarily from operation of construction equipment onsite, from vehicles transporting construction workers to and from the project site, and heavy trucks to import earth materials onsite. Construction equipment used for site preparation and grading typically generate the greatest amount of construction emissions.

The CalEEMod data for the project estimated a conservative approach of buildout of the project at one time and did not take into account phased development of the cemetery. Emissions associated with the construction period were estimated in CalEEMod based on the projected maximum amount of equipment that would be used onsite at any given time during construction activities. Proposed development would require site preparation and grading, building construction, paving, and architectural coating. A total of 13,100 cubic yards of soil would be

graded and recompacted on the project site and an additional 2,500 cubic yards of fill would be imported. The CalEEMod modeling conducted for the project determined that project construction, with a conservative estimate without any phasing, is estimated to generate a total of 14,667 metric tons (MT) of carbon dioxide equivalent (CO_2e). When amortized over a 30-year period, construction of the project would generate approximately 488.9 MT CO_2e per year. Consistent with the industry standard and per SCAQMD guidance, total construction GHG emissions resulting from a project were amortized over 30 years and added to operational GHG emissions to account for their contribution to GHG emissions over the lifetime of the project.

Estimated Operational GHG Emissions

CalEEMod calculates operational emissions from the project, which include carbon dioxide (CO_2), nitrogen oxide (N_2O), and methane (CH_4). For mobile sources, CO_2, N_2O, and CH_4 emissions from vehicle trips to and from the site were quantified using CalEEMod. The project would include a minimum of two parking spaces with EV chargers, which would reduce GHG emissions annually through encouraging the use of EVs over gasoline-powered vehicles. One EV charging station is estimated to reduce approximately 39,125 VMT annually. Operations of the proposed project is estimated to generate less than 200 MT CO_2e per year without the addition of amortized construction emissions.

For consistency with the 2022 CARB Scoping Plan and State and County Goals, the project would implement the following design features (included as conditions of approval by the County):

1. Low-flow plumbing fixtures, in compliance with CALGreen, which requires a 20 percent increase in indoor water use efficiency and use of indoor water-efficient irrigation systems.
2. Incorporation of Title 24 energy standards.
3. Landscaping across the project site, particularly along the project boundaries that will assist in carbon sequestration.
4. Comply with the County's Water Conservation in Landscaping Ordinance with automatically controlled efficient system and use of native plant species and non-invasive drought tolerant/low water use plants in landscaping plan.
5. Comply with County Ordinance Section 68.511 through 68.520 (Diversion of Construction and Demolition Materials from Landfill Disposal), which requires recycling of 90 percent of inert and 65 percent of all other materials from construction projects.
6. Comply with the County’s Strategic Plan to Reduce Waste (2017) through the support of commercial composting programs to reduce organic waste and comply with established waste diversion requirements.
7. Comply with the County’s Grading Ordinance and SDAPCD’s fugitive dust rules outlined in Section 87.426 of the County’s Grading Ordinance.
8. Utilize architectural coatings compliant with SDAPCD Rule 67.
9. The project would not result in any wasteful, inefficient, or unnecessary energy usage (see Section VI[a] above).
10. The project would renovate and reuse the existing residence on-site as an administrative office, which would reduce the construction-related GHG emissions generated when compared to demolition and construction of a new office.
11. The proposed building structures would incorporate photovoltaic (PV) provisions consistent with the requirements for residential land uses.
12. Achieve compliance with EV requirements in the most recently adopted version of CALGreen.

13. Tier IV Construction equipment for full grading buildout of project.
14. The project would have a less-than-significant impact from VMT (see Section XVII[b] below).
15. Ridesharing, carpooling, and shuttle services for funeral services.

Due to the nature of the use, incorporation of project design features, construction of the project in phases, and the location of the project in proximity to dense uses, the project is anticipated to have a less than significant impact associated with Greenhouse Gas Emissions. Further analysis for consistency with meeting State and County reduction goals can be found in part (b) below.

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

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Less Than Significant Impact: There are numerous State plans, policies, and regulations adopted to reduce GHG emissions. The principal state plan and policy is Senate Bill (SB) 32 and the California Global Warming Solutions Act of 2006. The quantitative goal of SB 32 is to reduce GHG emissions to 40 percent below 1990 levels by 2030. In 2022, the State passed AB 1279, which declares the State would achieve net-zero GHG emissions by 2045 and would reduce GHG emissions by 85 percent below 1990 levels by 2045. Pursuant to the SB 32 goal and AB 1279, the 2022 Scoping Plan was created to outline goals and measures for the State to achieve the reductions. Additionally, SANDAG adopted San Diego Forward: 2021 Regional Plan in 2021, and the County of San Diego General Plan provides goals and policies to reduce GHG emissions. Therefore, the analysis is based upon the project's consistency with plans and polices adopted for the purposes of reducing GHG emissions and mitigating the effects of climate change, including the CARB 2022 Scoping Plan and SANDAG's 2021 Regional Plan.

2022 Scoping Plan
The latest iteration of the Scoping Plan is the 2022 Scoping Plan, which focuses on outcomes needed to achieve carbon neutrality by assessing paths for clean technology, energy deployment, natural and working lands, and others, and is designed to meet the state's long-term climate objectives and support a range of economic, environmental, energy security, environmental justice, and public health priorities. The 2022 Scoping Plan's strategies that apply to the proposed project include the following:

- Reducing fossil fuel use, energy demand and VMT;
- Building decarbonization; and
- Maximizing recycling and diversion from landfills.

The project would be consistent with reducing VMT. The project site is located in an unincorporated portion of San Diego County that is surrounded by multiple municipalities and is an isolated unincorporated area. The project site is adjacent to dense residential uses within the City of Vista. The project consists of a Catholic cemetery in North County of San Diego. Due to the nature of the use of a cemetery, residents from various portions of the County are anticipated to use the cemetery with extremely infrequent trips only for funeral services and visitation. Additionally, the project is anticipated to be constructed in phases and will gradually increase over time. The operational trips of 30 ADT for Phase 1 and 138 ADT at maximum buildout of the

project during Phase 2 are conservative for operational characteristics of a new cemetery as trips associated with visiting a cemetery would gradually increase over time as more burials occur at the cemetery. The phased development of the project as well as full buildout were evaluated in traffic analyses for the project (Appendix K and L). By locating a Catholic cemetery in North County in an area that is not adjacent to similar cemeteries, it is anticipated that the cemetery would provide options for burials of the deceased and reduce lengths of trips to other cemeteries in San Diego County located away from the project site. The project site is also located approximate 1,000 feet away from the St. Thomas More Catholic church which can provide funeral and religious services that are typical of chapels and operations of Catholic cemeteries. In addition, the traffic analysis for the project estimates that the project will result in a net decrease of 84 VMT, consistent with its net decrease in daily trip generation compared to the previous operations of the site. The project does not include residential uses or a substantial number of employees which are typical in generating mobile emissions.

The proposed project would be consistent with these goals through project design that would be consistent with latest California 2022 Energy Code. The proposed building structures would incorporate PV provisions consistent with the requirements for residential land uses. In addition, the 2022 CALGreen Standards state five percent of the total number of parking spaces shall be equipped with Level 2 electric vehicle supply equipment, which is approximately two electric chargers. The proposed project would include electric vehicles as well as infrastructure for two electrical vehicle spaces beyond the minimum requirement. The proposed project would also not include the use of natural gas associated with the project and would redevelop an existing single-family residence for the use of the administrative office for the cemetery. The proposed project would be served by San Diego Gas & Electric, which is required to increase its renewable energy procurement in accordance with SB 100 targets.

In addition, the project would be consistent with the County requirement of recycling 90 percent of inert and 65 percent of all other materials from construction projects, per County Ordinance Section 68.511 through 68.520 (Diversion of Construction and Demolition Materials from Landfill Disposal). The project proposes redevelopment of an existing site and will redevelop an existing single-family residence for the use of an administrative office for the cemetery for Phase 2. Therefore, the proposed project would not conflict with the 2022 Scoping Plan.

San Diego Forward: 2021 Regional Plan

The 2021 Regional Plan provides a framework for meeting goals with coordinated land use and transportation planning strategies. Implementation actions related to projects, policies and programs would confirm SANDAG's commitment to fully realizing the strategies in the 2021 Regional Plan. The Sustainable Communities Strategy (SCS) envisions a transportation system that is fast, fair, and clean, as well as a region that is resilient to economic and environmental changes. The 2021 Regional Plan polices are built around three core strategies:

- Invest In a Reimagined Transportation System. Build a network and fund services that include multimodal roadways; an expanded network of fast, frequent, and low-cost transit; 21st century technology that manages the entire transportation system and connects people to on-demand services; and zero-emissions options for vehicles and micromobility.
- Incentivize Sustainable Growth and Development. Collaborate with local jurisdictions and fund programs to accelerate housing production while also addressing equity, climate resilience, and mobility.

- Implement Innovative Demand and System Management. Reduce solo driving and congestion through increased remote work, carsharing, vanpooling, pricing strategies and parking management programs that leverage partnerships and technology.

The proposed project would develop a phased cemetery, with an approximately 2,200-square-foot administration building, parking, a new internal circulation system, fencing surrounding the project site, parking spaces, landscaping, utility improvements, and grave sites on a 14.5-acre site in the North County Metropolitan Subregional Planning Area. The proposed project would be consistent with the SANDAG growth projections. The project would not generate population growth or and would reuse one residence on-site as an administrative office, which would not substantially affect housing; therefore, the project would not conflict with the region's future employment and housing needs. This project is not a transportation project that would affect the region's transportation systems and should not increase transportation demands within the local area. Therefore, the project would not induce substantial population and would not conflict with or obstruct implementation of the 2021 Regional Plan.

San Diego County General Plan

The General Plan provides a consistent framework for land use and development decisions consistent with an established community vision. As the equivalent of a local "constitution" for land use and development, the General Plan's diagrams, goals, and policies form the basis for the County's zoning, subdivision, and infrastructure decisions. The General Plan Conservation and Open Space, and Land Use Element provide the following goals, policies and objectives pertaining to greenhouse gas emissions that are relevant to this analysis:

- COS-14.3: Sustainable Development. Require design of residential subdivisions and nonresidential development through "green" and sustainable land development practices to conserve energy, water, open space, and natural resources.
- COS-15.4: Title 24 Energy Standards. Require development to minimize energy impacts from new buildings in accordance with or exceeding Title 24 energy standards.
- LU-5.1: Reduction of Vehicle Trips within Communities. Incorporate a mixture of uses within Villages and Rural Villages and plan residential densities at a level that support multi-modal transportation, including walking, bicycling, and the use of public transit, when appropriate.

The project would comply with the latest Title 24 Energy Standards that reduces wasteful, expensive, inefficient or unnecessary use of energy. The project would be subject to CALGreen, which requires a 20 percent increase in indoor water use efficiency and use of indoor water-efficient irrigation systems. In addition, the project replaces existing land uses and would result in a reduction of daily trip generation by 38 ADT and a net decrease of 84 VMT. The project will be constructed in phases and the first phase of the project is only anticipated to generate a total of 30 ADT. Therefore, the project would be consistent with goals and policies in the San Diego County's General Plan to reduce GHG.

Conclusion

Due to the nature of the use, incorporation of project design features, construction of the project in phases, reduction of trips, and the location of the project, the proposed project would comply with the plans, policies, regulations, and GHG reduction actions/strategies outlined in the 2022 Scoping Plan, 2021 Regional Plan, and the San Diego County General Plan. Consistency with the plans, policies, regulations, and GHG reduction actions/strategies would reduce the project's incremental contribution of GHG emissions. Therefore, the proposed project's GHG impacts would be less than significant.

IX. HAZARDS AND HAZARDOUS MATERIALS.

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

☐ Potentially Significant Impact
☒ Less Than Significant With Mitigation Incorporated
☐ Less than Significant Impact
☐ No Impact

Discussion/Explanation: A Phase I Environmental Site Assessment (ESA) was prepared for the project by Ninyo & Moore, dated April 26, 2019 (see Appendix E). A Phase II ESA was prepared for the project by Ninyo & Moore, dated October 15, 2020 (see Appendix F). The following responses have incorporated the analysis from the report.

Less Than Significant With Mitigation Incorporated: Project construction would involve the transport of gasoline and other petroleum-based products associated with construction equipment. These materials are considered hazardous as they could cause temporary localized soil and water contamination. Incidents of spills or other localized contamination could occur during refueling, operation of machinery, undetected fluid leaks, or mechanical failure. However, all storage, handling, and disposal of these materials are regulated by California Department of Toxic Substances Control, the USEPA, and the Vista Fire Protection District. All construction activities involving the transportation, usage, and disposal of hazardous materials would be subject to all applicable federal, state, and local requirements, which would reduce impacts associated with the use and handling of hazardous materials during construction to less than significant. Operationally, the project would involve the transport, use, and storage of gasoline and diesel fuel. However, the project will not result in a significant hazard to the public or environment because all storage, handling, transport, emission and disposal of hazardous substances will be in full compliance with local, State, and Federal regulations. California Government Code § 65850.2 requires that no final certificate of occupancy or its substantial equivalent be issued unless there is verification that the owner or authorized agent has met, or is meeting, the applicable requirements of the Health and Safety Code, Division 20, Chapter 6.95, Article 2, Section 25500-25520.

As part of the Phase I ESA, a preliminary vapor encroachment screen was conducted to identify the presence or likely presence of potential contaminants of concern vapors in subsurface soils at the site caused by the release of vapors from contaminated soil or groundwater on or near the site. The Phase I ESA determined that a vapor encroachment condition is unlikely and recommended no further investigation. The Phase I ESA determined that the historic use of the site and adjacent properties as nurseries and for agricultural purposes is considered a recognized environmental condition (REC) due to the application of pesticides and insecticides, which may have impacted soil at the site. Disturbance of soils on-site during construction and grading activities for the project would potentially result in exposure of contaminated soil or groundwater. Therefore, the County of San Diego Planning and Development Services (PDS) staff requested a limited Phase II ESA to investigate the former agricultural use of the site, which was identified as a REC in the Phase I ESA (Appendix E and Appendix F).

The Phase II ESA included soil sampling at multiple locations across the project site (Appendix F). The recommended sample frequency specified in the 2008 California Department of Toxic Substances Control (DTSC) *Interim Guidance for Sampling Agricultural Properties* was followed, which consisted of 27 shallow borings, 7 composited organochlorine pesticides (OCPs) analyses, and 7 discrete analyses for arsenic. The Phase II ESA soil sampling determined that the OCPs were not detected above their respective laboratory reporting limits in the 7 soil samples analyzed. Further, the OCP levels were less than their respective USEPA Regional Screening Levels for commercial and industrial soil (Appendix F). Further, while arsenic, a naturally occurring metal, was detected in the 7 soil samples analyzed, the arsenic concentrations were less than the DTSC's screening level of 12 milligrams per kilogram. Therefore, the Phase II ESA determined that based on the soil sampling and testing conducted, OCPs and arsenic do not appear to be a significant human health risk to future site occupants or construction workers. The Phase II ESA recommends that visible dust be kept to a minimum during construction. This is consistent with the SDAPCD's fugitive dust rules and MM BIO-1, which requires that the contractor create and implement a plan to minimize fugitive dust to reduce indirect impacts to birds. The Phase II ESA also recommends that if, during construction activities, contamination is discovered or suspected, notification to regulatory agencies may be required and exposed/excavated contaminated materials or wastes should be properly managed, particularly if there is the potential to affect worker or public health and safety and/or the environment. Therefore, MM HAZ-1 would require notification to regulatory agencies and proper management of potentially hazardous materials or wastes if contamination is discovered or suspected during construction activities.

Given the age of the existing structures on-site, it is possible that Asbestos Containing Materials (ACM) and Lead Based Paint (LBP) are present. Lead is a highly toxic metal that was used up until 1978 in paint used on walls, woodwork, siding, windows, and doors. Lead-containing materials shall be managed by applicable regulations including, at a minimum, the hazardous waste disposal requirements (Title 22 California Code of Regulations [CCR] Division 4.5, the worker health and safety requirements (Title 8 CCR §1532.1), and the State Lead Accreditation, Certification, and Work Practice Requirements (Title 17 CCR Division 1, Chapter 8). Asbestos was used extensively from the 1940's until the late 1970's in the construction industry for fireproofing, thermal and acoustic insulation, condensation control, and decoration. The USEPA has determined that there is no "safe" exposure level to asbestos. It is, therefore, highly regulated by the USEPA, the California Environmental Protection Agency (CalEPA), and the California Division of Occupational Safety and Health (CalOSHA). Demolition or renovation operations that involve ACMs must conform to SDAPCD Rules 361.140-361.156. Therefore, with compliance federal, state, and local regulations, the proposed project would not create a significant hazard to the public or the environment through the disturbance of ACM or LBP.

In addition, the project site contains an existing septic system below the ground service. Existing leach lines for the septic tank would be pumped and removed through applicable required permits from the Department of Environmental Health and Quality. Therefore, with compliance with applicable required permit conditions, the proposed project would not create a significant hazard to the public or the environment through the removal of existing leach lines associated with the septic system.

Therefore, with implementation of MM HAZ-1 and all applicable federal, state and local regulations and permit requirements, the project would not create a significant hazard to the

public or the environment through the routine transport, use, or disposal of hazardous materials, and impacts would be less than significant with mitigation.

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

☐ Potentially Significant Impact
☒ Less Than Significant With Mitigation Incorporated
☐ Less than Significant Impact
☐ No Impact

Less Than Significant with Mitigation: There is one school within 0.25-mile of the project site, Montessori School of Oceanside. The project site is located approximately 1,150 feet (approximately 0.22 mile) east from the nearest corner of the school. As described further in Section IX(a), OCPs and arsenic detected during soil sampling were determined to be below their respective regulatory screening levels and do not appear to be a significant human health risk to future site occupants or construction workers. MM HAZ-1 would require notification to regulatory agencies and proper management of potentially hazardous materials or wastes if contamination is discovered or suspected during construction activities. Further, the removal of ACM, LBP, and existing leach lines associated with the septic system on-site would occur in accordance with applicable federal, state and local regulations and permit requirements. The project site contains an existing residence that will be remodeled during phase 2. The existing residence appears to have been on the project site prior to the 1980s. Due to the age of the structure, the project will be conditioned to conduct lead and asbestos surveys prior to remodeling and construction of the administration building during phase 2. In the event that lead and asbestos are found in the existing structures, construction associated with the building permit of the market renovation will require lead and asbestos treatment in conformance with the Air Pollution and Control District regulations. The transport and handling of minor amounts of hazardous materials during construction and operation would comply with all applicable federal, state, and local regulations that control hazardous material handling (refer to Section IX[a]). Therefore, with implementation of HAZ-1 and all applicable federal, state and local regulations and permit requirements, the project would not have a substantial adverse effect on an existing or proposed school.

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

☐ Potentially Significant Impact
☒ Less Than Significant With Mitigation Incorporated
☐ Less than Significant Impact
☐ No Impact

Less Than Significant with Mitigation: The Phase I ESA prepared for the project determined that there are no known cases or listings on federal, state, tribal, and local environmental databases searched. There were no records from the County Department of Environmental Health and Quality, SDAPCD, City of Vista, San Diego RWQCB, Encina Water Authority District, and County Department of Agricultural Weights and Measures. As previous described, OCPs and arsenic were detected during soil sampling conducted as part of the Phase II ESA; however,

these OCPs and arsenic were determined to be below their respective regulatory screening levels and do not appear to be a significant human health risk to future site occupants or construction workers. The project would require standard notification to regulatory agencies and proper management of potentially hazardous materials or wastes if contamination is discovered or suspected during construction activities. Further, the removal of ACM, LBP, and existing leach lines associated with the septic system on-site would occur in accordance with applicable federal, state and local regulations and permit requirements. The transport and handling of minor amounts of hazardous materials during construction and operation would comply with all applicable federal, state, and local regulations that control hazardous material handling (refer to Section IX[a]). Therefore, with implementation of HAZ-1 and all applicable federal, state and local regulations and permit requirements, the project would not create a significant hazard to the public or environment.

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

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Less than Significant Impact: The project site is located within the Airport Overflight Notification Area and the Airport Influence Area (Review Area 2) of the McClellan-Palomar Airport Land Use Compatibility Plan (ALUCP). McClellan-Palomar Airport in the City of Carlsbad is located approximately 2.96 miles southwest of the project site. However, the project does not propose construction of any structure equal to or greater than 150 feet in height, constituting a safety hazard to aircraft and/or operations from an airport or heliport. Therefore, the project would not constitute a safety hazard for people residing or working in the project area.

e) Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

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

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

Less Than Significant Impact: The Operational Area Emergency Plan is a comprehensive emergency plan that defines responsibilities, establishes an emergency organization, defines lines of communications, and is designed to be part of the statewide Standardized Emergency Management System. The Operational Area Emergency Plan provides guidance for emergency planning and requires subsequent plans to be established by each jurisdiction that has responsibilities in a disaster situation. The Multi-Jurisdictional Hazard Mitigation Plan includes

an overview of the risk assessment process, identifies hazards present in the jurisdiction, hazard profiles, and vulnerability assessments. The plan also identifies goals, objectives and actions for each jurisdiction in the County of San Diego, including all cities and the County unincorporated areas. The project would not interfere with this plan because it would not prohibit subsequent plans from being established or prevent the goals and objectives of existing plans from being carried out.

ii. SAN DIEGO COUNTY NUCLEAR POWER STATION EMERGENCY RESPONSE PLAN

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

iii. OIL SPILL CONTINGENCY ELEMENT

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

iv. EMERGENCY WATER CONTINGENCIES ANNEX AND ENERGY SHORTAGE RESPONSE PLAN

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

v. DAM EVACUATION PLAN

No Impact: The Dam Evacuation Plan would not be interfered with because the project is not located within a dam inundation zone.

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

☐ Potentially Significant Impact	☒ Less than Significant Impact
☐ Less Than Significant With Mitigation Incorporated	☐ No Impact

Less Than Significant Impact: The project is not located within the Wildland-Urban Interface Zone or a very high fire hazard severity zone (FHSZ). As such, the project is not required to prepare a Fire Protection Plan (FPP). The Building Plan for the project is required to be reviewed and approved by the County Fire Authority and as such, would comply with regulations relating to emergency access, water supply, and defensible space specified in the County Fire Code and Consolidated Fire Code (see Section XX, Wildfire). Based on review of the project by County staff, and through compliance with the County Fire Code and Consolidated Fire Code, impacts would be less than significant.

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

☐	Potentially Significant Impact	☐	Less than Significant Impact
☐	Less Than Significant With Mitigation Incorporated	☒	No Impact

No Impact: The project does not involve or support uses that allow water to stand for a period of 72 hours (3 days) or more (e.g., artificial lakes, agricultural irrigation ponds). Also, the project does not involve or support uses that would produce or collect animal waste, such as equestrian facilities, agricultural operations (e.g., chicken coops, dairies, etc.), solid waste facility or other similar uses. Therefore, the project would not substantially increase current or future resident's exposure to vectors, including mosquitoes, rats, or flies.

Mitigation Measures

HAZ-1 Prior to the preconstruction meeting for the project, the following Grading and or Improvement Plan Notes shall be placed on the Preliminary Grading Plan and made conditions of the issuance of said permits:

In the event that any activity, including earthmoving or construction, discovers the presence of contaminated soils on-site, the contractor and/or property owner shall notify County PDS and DEHQ. The presence of contaminated soils will require soil testing and remediation in accordance with standard County procedures. This process will be determined once the County is notified of the presence of contaminated soils.

X. HYDROLOGY AND WATER QUALITY.

a) Would the project violate any water quality standards *or* waste discharge requirements or otherwise substantially degrade surface or ground water quality?

☐	Potentially Significant Impact	☒	Less than Significant Impact
☐	Less Than Significant With Mitigation Incorporated	☐	No Impact

Discussion/Explanation: The following technical studies have been prepared for the project:

- PDP SWQMP prepared by Chang Consultants, dated January 11, 2024 (Appendix G).
- Drainage Certification Letter prepared by Change Consultants, dated January 11, 2024 Drainage Study prepared by Chang Consultants, dated November 16, 2021 (Appendix H).

The following responses have incorporated the analyses from these studies.

Less Than Significant Impact: Potential sources of water pollution would include construction phase disturbance of the soils through grading, materials delivery, and waste generation, and post-construction development, including impervious surfaces, landscaped areas

(fertilizers/pesticides), and motor vehicles. However, as described in the PDP SWQMP for the proposed project prepared by Chang Consultants, dated January 11, 2024 (Appendix G) an, respectively, the project is required to obtain a waste discharge identification number and a NPDES General Construction Permit for stormwater discharges from the State Water Resources Control Board (Region 9). The General Construction Permit for requires preparation and implementation of a SWPPP and associated BMPs. As noted in the PDP SWQMPs for the proposed project, construction BMPs would include hydraulic stabilization hydroseeding in the summer, bonded fiber matrix or stabilized fiber matrix in the winter, erosion control measures on flat areas, energy dissipator outlet protection, fiber rolls, storm drain inlet protection, a stabilized construction entrance, materials management, and waste management.

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

Additionally, the PDP SWQMPs prepared for the project include several long-term operational BMPs that would prevent degradation of surface or groundwater quality, including but not limited to site design (landscaping and maintenance of common area and slopes with native or drought-tolerant species, dedication of open space outside of the development footprint), source control (maintaining landscaping using minimum or no pesticides, storm drain stenciling/signage, protect trash storage areas, and others), directing runoff to pervious areas, and structural controls including biofiltration basins.

Given that the project would incrementally increase the area of impervious surfaces onsite, and includes construction and long-term operational BMPs, the project would have less than significant impacts on water quality standards and discharge requirements, as well as degradation of surface and groundwater quality in general.

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

☐	Potentially Significant Impact	☒	Less than Significant Impact
☐	Less Than Significant With Mitigation Incorporated	☐	No Impact

Less Than Significant Impact: The project lies in the Los Monos Hydrologic Sub Area of the Agua Hedionda Hydrologic Area of the Carlsbad Hydrologic Unit (904.31). The nearest impaired waterbody as listed on the Clean Water Act Section 303(d) list is Agua Hedionda Creek approximately 1.5 miles south of the project site. According to the Clean Water Act Section 303(d) list, Agua Hedionda Creek is impaired for nitrogen, selenium, manganese, total dissolved solids, phosphorus, indicator bacteria, toxicity, benthic community effects, bifenthrin, chlorpyrifos, cypermethrin, and malathion. According to the Drainage Study prepared for the project by Chang Consultants, dated November 16, 2021 (Appendix H), drainage from the project site is tributary to a drainage course flows northwest and ultimately to Calavera Creek, Agua Hedionda Creek, Agua Hedionda Lagoon, and the Pacific Ocean.

The PDP SWQMPs prepared for the project includes design measures and source control BMPs such that potential pollutants would be reduced to the maximum extent practicable so as not to increase the level of pollutants in receiving waters and reduce impacts on stormwater quality and hydromodification to less than significant levels during construction (e.g., hydraulic stabilization hydroseeding in the summer, bonded fiber matrix or stabilized fiber matrix in the winter, erosion control measures on flat areas, energy dissipator outlet protection, fiber rolls, storm drain inlet protection, a stabilized construction entrance, materials management, and waste management). As part of this project, associated improvements would include two bio-filtration basins. The BMPs are consistent with the regional surface water and stormwater planning and permitting process that has been established to improve the overall water quality in County watersheds. As a result, the project would not contribute to a cumulative impact to an already impaired water body, as listed on the Clean Water Act Section 303(d). Regional surface water and stormwater permitting regulation for County of San Diego includes the following: RWQCB, San Diego Region Order No. R9-2013-0001 as amended by R9-2015-0001 and R9-2015-0100; County Watershed Protection Ordinance (WPO; Sections 67.801 et seq.); County Stormwater Management, and Discharge Control Ordinance; and County Stormwater Standards Manual. The stated purposes of these ordinances are to protect the health, safety and general welfare of the County of San Diego residents; to protect water resources and to improve water quality; to cause the use of management practices by the County and its citizens that would reduce the adverse effects of polluted runoff discharges on waters of the state; to secure benefits from the use of storm water as a resource; and to ensure the County is compliant with applicable state and federal laws. The WPO has discharge prohibitions, and requirements that vary depending on type of land use activity and location in the County. Each project subject to WPO is required to prepare a Stormwater Management Plan that details a project's pollutant discharge contribution to a given watershed and propose BMPs or design measures to mitigate any impacts that may occur in the watershed.

The project would implement construction and operational BMPs to protect water quality as established in the PDP SWQMP prepared for the project and described above in Section X(a). The proposed BMPs are consistent with regional surface water and stormwater planning and permitting process that has been established to improve the overall water quality in County watersheds. As a result, the project would not contribute to a cumulative impact to an already impaired water body, as listed on the Clean Water Act Section 303(d).

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

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Less Than Significant Impact: The RWQCB has designated water quality objectives for waters of the San Diego Region to protect the existing and potential beneficial uses of each hydrologic unit. The project lies in the Los Monos Hydrologic Sub Area of the Agua Hedionda Hydrologic Area of the Carlsbad Hydrologic Unit (904.31) that has the following existing beneficial uses for groundwater: municipal and domestic supply, agricultural supply, and industrial service supply, (State Water Resources Control Board 2021).

Potential sources of polluted runoff resulting from the project are discussed in the PDP SWQMP prepared for the project. As described in Section X(a) and (b) above, a number of construction and operational BMPs would be employed to reduce potential pollutants in runoff to the maximum extent practicable, such that the project would not cause or contribute to an exceedance of applicable surface or groundwater receiving water quality objectives or degradation of beneficial uses. The proposed BMPs are consistent with regional surface water and stormwater planning and permitting process that has been established to improve the overall water quality in County watersheds. As a result, the project would not contribute to a cumulatively considerable exceedance of applicable surface or groundwater receiving water quality objectives or degradation of beneficial uses.

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

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Less Than Significant Impact: The project would obtain its water supply from the Vista Irrigation District that obtains water from surface reservoirs or other imported water source. Limited water would be required during the construction phase for dust control and suppression and the project would not use any groundwater during construction or operation phases of the project.

In addition, the project would result in an incremental increase in impervious surfaces, which would not interfere with regional groundwater recharge, and would include landscaping bordering the paved surfaces which would allow for infiltration. The project would not involve regional diversion of water to another groundwater basin, or diversion or channelization of a stream course or waterway with impervious layers, such as concrete lining or culverts, for substantial distances (e.g., 0.25-mile). Therefore, impacts would be less than significant.

e) Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or through the addition of impervious surface, in a manner which would:

(i) result in substantial erosion or siltation on- or off-site;

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Less Than Significant Impact: Under existing conditions, stormwater runoff from the project site flows over the natural ground and pavement surfaces in a northerly to northwesterly direction. The runoff is conveyed to an unnamed natural drainage course within the northerly portion of the project site. The drainage course flows northwest and ultimately to Calavera Creek, Agua Hedionda Creek, Agua Hedionda Lagoon, and the Pacific Ocean. Under proposed project conditions, the project runoff will continue to be directed to the unnamed natural drainage course within the northerly portion of the site.

The project proposes to create new impervious surfaces on the project site. However, the project would primarily create pervious grave sites, so there would be a minor increase in runoff. This increase could be mitigated by the proposed biofiltration basins. For instance, stormwater runoff from the impervious surfaces (administration/office area, warehouse, and streets) and permeable pavement would be conveyed in the proposed streets and storm drain system to a single biofiltration basin (BMP 1) near the northwest corner of the project site for pollutant and flow control. The grave site areas would meet self-mitigating criteria, so stormwater runoff from these areas would flow off-site without commingling with the drainage areas tributary to the biofiltration basin. The project would be required to install half-street improvements along the west side of Buena Vista Drive (curb, gutter, sidewalk, and approximately 7 feet of widening. Runoff is currently conveyed down the street in a southerly direction. The majority of the runoff is directed onto the site by an existing spillway on the west end of the street. A biofiltration basin (BMP 2) near the northeast corner of the site would provide pollutant and flow control for the Buena Vista Drive improvements.

The existing drainage patterns within the project footprint would be altered, which is typical for development projects. Stormwater runoff would be conveyed in the proposed streets, drainage facilities, biofiltration basins, and grave sites. The streets and drainage facilities are designed to convey the 100-eyar flow. Riprap would be installed at the outlets of the proposed storm drain systems in accordance with County standards to prevent erosion. The project will not increase or impact the off-site flows. Under existing and proposed conditions, the site runoff is captured by an on-site unnamed natural drainage course that continues off-site. The unnamed natural drainage course would be directed around the proposed biofiltration basin. However, the location where the unnamed natural drainage course leaves the site and the 100-year flow rate in the unnamed natural drainage course at this location would not be altered by the project, so there would be no off-site flooding nor erosion/siltation impacts. The on-site drainage facilities would be designed to adequately convey the design storm, so there would be no on-site flooding. In addition, the project would not substantially alter the existing drainage patterns of the project site or area. The majority of the runoff would remain as sheet flow over the naturally sloping terrain. The flow patterns of the minor on-site drainage courses would generally be maintained. This in conjunction with the riprap at storm drain outlets would prevent substantial erosion or siltation on- and off-site.

Further, the project would implement construction and operational BMPs to protect water quality as established in the PDP SWQMP prepared for the project and described above in Section X(a) and (b). Several of these BMPs are intended to reduce erosion and siltation to the maximum extent feasible. Therefore, the project would not result in substantial erosion or siltation on- or offsite.

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

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Less Than Significant Impact: Please refer to Section X(e)(i). The proposed project would not significantly alter established drainage patterns or significantly increase the amount of runoff. Based on the Drainage Study prepared by Chang Consultants, dated November 16, 2021 (Appendix H), the 100-year peak flow from the project site would be slightly increased following development of the site; however, this increase would be accommodated by the two proposed biofiltration basins, and drainage patterns and basin areas would not be substantially altered. Therefore, the project would have a less than significant impact with respect to increasing the rate or amount of surface runoff in a manner which would result in flooding on- or offsite.

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

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Less Than Significant Impact: Please refer to Section X(e)(i). Since the project would not increase the off-site 100-year flow rate, the project would not create nor contribute runoff that would impact the current capacity of existing nor proposed capacity of planned stormwater drainage systems.

The project would implement construction and operational BMPs to protect water quality as established in the PDP SWQMP prepared for the project and described above in Section X(a) and (b) and would have a less than significant impact with regard to substantial additional sources of polluted runoff. As described in Section X(e)(i) above, the project would not significantly alter established drainage patterns and would actually reduce the amount of runoff from the project site (Appendix H). Therefore, the project would have a less than significant impact with respect to creating or contributing runoff water that would exceed the capacity of existing or planned stormwater drainage systems.

(iv) impede or redirect flood flows?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Less Than Significant: Please see Section X(e)(i) through (iii). The Drainage Study prepared by Chang Consultants, dated November 16, 2021 (Appendix H) demonstrates that the project would not impede or redirect flood flows.

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

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less than Significant Impact
☒ No Impact

No Impact: The project would not place structures in a 100-year flood hazard area because there are no such hazard areas mapped at the site by the Federal Emergency Management Agency (FEMA) or the County. As described in Section IX(e)(v), there are no dams nor levees that affect the site. Therefore, the project site is not located in a flood hazard zone. Additionally, the project site is located outside of a tsunami or seiche zone given its distance from a lake or the coast. Therefore, no impact would occur.

g) Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Less Than Significant Impact: The project site would be in compliance with the San Diego Basin Water Quality Control Plan and is not located within a County Sustainable Groundwater Management Act or Groundwater Sustainability Plan basin area. See Section X(a) through (d). The project would implement construction and operational BMPs established in the PDP SWQMP prepared for the project to protect water quality. It should be noted that burial operations of the project typically include placement of caskets or urns within concrete lined vaults which assists in sealing individual gravesites from surrounding soils. As a result, the project would not contribute to a direct or cumulatively considerable exceedance of applicable surface or groundwater receiving water quality objectives or degradation of beneficial uses. As described in Section X(d) above, the project would not use any groundwater for any purpose, including irrigation, domestic, or commercial demands. In addition, the project does not involve operations that would interfere substantially with groundwater recharge. The project would be required to implement the PDP SWQMP, prepare and implement a SWPPP, and be in compliance with the County's WPO. Therefore, the project would have a less than significant impact with regard to implementation of the Basin Plan or a sustainable groundwater management plan.

XI. LAND USE AND PLANNING.

a) Would the project physically divide an established community?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Less Than Significant Impact: The proposed project would develop a cemetery, including conversion of an existing house to an administration building, parking, a new internal circulation (road) system, an entry gate with guard building, fencing or solid wall around the perimeter of the site, landscaping, and utility improvements on a 14.5-acre site. The remainder of the site would be reserved for grave sites. The proposed cemetery would provide opportunities for visitation to gravesite areas. The site is currently developed with an existing nursery with several buildings and structures that would be removed. The project proposes the development of additional buildings on a currently developed site used as a commercial nursery and would not disrupt or divide the community further than existing conditions. No component of the project would introduce a new barrier or division to, or otherwise result in a conflict with, the surrounding residential, commercial, or industrial development or other established community.

b) Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Less Than Significant Impact: The project would develop a cemetery in an unincorporated area of the County of San Diego surrounded by the Cities of Vista and Oceanside, which is consistent with the A70, Limited Agriculture zoning designation for the project site upon approval of the MUP. Surrounding land uses consist of multi-family residences immediately to the south, rural residences to the north, institutional (i.e., library, St. Thomas More Catholic Church), commercial, and multi-family (assisted living) residences to the west, and agricultural (wholesale nursery) uses to the east. The project does not conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, impacts would be less than significant.

XII. MINERAL RESOURCES.

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

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Less Than Significant Impact: The project site is not classified by the California Department of Conservation – Division of Mines and Geology as an area of "Potential Mineral Resource Significance." The project site is surrounded by developed residential, commercial, and agricultural land uses which would be incompatible with future extraction of mineral resources on the project site. A future mining operation at the project site would create a significant impact to neighboring properties for issues such as noise, air quality, traffic, and possibly other impacts. Therefore, implementation of the project would not result in the loss of availability of a known mineral resource that would be of value since the mineral resource extraction would not occur at the site due to incompatible land uses.

b) Would the project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Less Than Significant Impact: According to the County of San Diego General Plan, the project site is located within an MRZ-3 Zone (Resources Potentially Present) and approximately 6 miles from nearest MRZ-2 Zone (Resources Present) site. However, a future mining operation at the project site would create a significant impact to neighboring properties for issues such as noise,

air quality, traffic, and possibly other impacts. Therefore, implementation of the project would not result in the loss of availability of a known mineral resource that would be of value since the mineral resource extraction would not occur at the site due to incompatible land uses. Therefore, the project would not result in the loss of availability of locally important mineral resource(s). Therefore, no potentially significant loss of availability of a locally important mineral resource recovery (extraction) site delineated on a local general plan, specific plan, or other land use plan would occur as a result of this project.

XIII. NOISE.

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

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

Discussion/Explanation: A Response to Second Iteration Noise Issues was prepared for the project by Eilar Associates, Inc. dated September 24, 2021 (see Appendix I). The following responses have incorporated the analysis from the report.

Less Than Significant: The proposed project would develop a cemetery, including conversion of an existing house to an administration building, parking, a new internal circulation (road) system, an entry gate with guard building, fencing or solid wall around the perimeter of the site, landscaping, and utility improvements on a 14.5-acre site. The project is expected to result in fewer trips than the existing conditions; therefore, project-generated traffic noise is expected to be less than significant (Appendix I). Calculations show that noise impacts from HVAC equipment and shuttle operation are expected to comply with the noise limits set within the County of San Diego Noise Ordinance, the City of Vista Municipal Code, and the City of Oceanside Municipal Code at surrounding property lines during daytime hours. Impacts would be less than significant.

General Plan – Noise Element
The County of San Diego General Plan, Noise Element, Tables N-1 and N-2 addresses noise sensitive areas and requires an acoustical study to be prepared for any use that may expose noise sensitive areas to noise in excess of a Community Noise Equivalent Level (CNEL) of 60 dBA for single residences (including senior housing, convalescent homes), and 65 dBA CNEL for multi-family residences (including mixed-use commercial/residential). Moreover, if the project is located in an area in excess of 60 dBA CNEL or 65 dBA CNEL, modifications must be made to the project to reduce noise levels. Noise sensitive areas include residences, hospitals, schools, libraries or similar facilities as mentioned within Tables N-1 and N-2. Project implementation is not expected to expose existing or planned noise sensitive areas to road, airport, heliport, railroad, industrial or other noise in excess of the 60 dBA CNEL or 65 dBA CNEL.

Typical construction activities would not exceed the County of San Diego temporary construction noise limit of 75 dBA at adjacent property lines during the construction activity. General good

practice measures including reasonable maintenance of equipment, conservative planning of simultaneous equipment operation, and using equipment with effective mufflers would ensure that noise levels remain below the County of San Diego construction noise limits. Equipment operation would be limited to the County of San Diego's allowable hours of operation (Monday through Saturday 7 a.m. to 7 p.m.). With these recommendations, it is expected that construction equipment noise levels will be at or below an average eight-hour equivalent noise level of 75 dBA, in compliance with County of San Diego regulations.

Noise Ordinance – Section 36.404
The project is also subject to the County Noise Ordinance. General construction equipment for grading and preparation of the site would be required. Construction equipment is anticipated to be comprised of a backhoe, hi-lift (a type of front-end loader), sheepsfoot roller, dozer, and trackhoe (similar to an excavator). Temporary construction noise is subject to Section 36.408, 409, and 410 of the Ordinance. Construction equipment operations are subject to a 75 dBA 8-hour average sound level limit at the boundary of an occupied residence. With compliance with the County Noise Ordinance, impacts would be less than significant.

The project's conformance to the County of San Diego General Plan Noise Element and County of San Diego Noise Ordinance (Section 36-404 and 36.410) ensures the project would not create cumulatively considerable noise impacts, because the project would not exceed the local noise standards for noise sensitive areas; and the project would not exceed the applicable noise level limits at the property line or construction noise limits, derived from State regulation to address human health and quality of life concerns. Therefore, the project would not contribute to a cumulatively considerable exposure of persons or generation of noise levels in excess of standards established in the local general plan, noise ordinance, and applicable standards of other agencies.

b) Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Less Than Significant Impact The proposed project would develop a cemetery, including conversion of an existing house to an administration building, parking, a new internal circulation (road) system, an entry gate with guard building, fencing or solid wall around the perimeter of the site, landscaping, and utility improvements on a 14.5-acre site. Construction of the project is not expected to include any significant vibration inducing equipment, such as pile driving or heavy soil compaction (Appendix I). Therefore, excessive levels of groundborne vibration and groundborne levels are not expected to be received by any persons. Impacts would be less than significant.

c) Would the project result in a substantial permanent increase in ambient noise levels in the project vicinity above existing levels?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Less Than Significant Impact: The project is subject to the County Noise Element which requires proposed residential development not to be exposed to noise levels exceeding 60 dBA CNEL. Anticipated operational noise sources at the proposed project site are expected to consist of a small electric shuttle and small HVAC equipment at the administration building. As no amplified live music or amplified speech is expected to be present for individual funeral services, noise from funeral services is expected to be limited to very low noise levels of individuals speaking, which would be expected to be less than significant at off-site receivers. In the event that outdoor speakers are used, the speakers will be required to be placed more than 100 feet away from the nearest property line and directed away from the nearest property line. The hours of operation are anticipated to generally be limited to the daytime hours of 8 a.m. to 4:30 p.m. (Appendix I).

Non-transportation noise generated by the project is not expected to exceed the standards of the County of San Diego Noise Ordinance (Section 36.404) at or beyond the project's property line. Limited agriculture (A70) zone has a 1-hour average sound limit of 45 between 10 p.m. and 7 a.m. and 50 dB between 7 a.m. and 10 p.m. According to the Response to Second Iteration Noise Issues (Appendix I), noise levels from HVAC and shuttle operation on site would be expected to meet the noise limits set within the County of San Diego Noise Ordinance, City of Vista Municipal Code, and City of Oceanside Municipal Code at surrounding properties during daytime hours without additional mitigation. Impacts would be less than significant.

d) Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

☐	Potentially Significant Impact	☒	Less than Significant Impact
☐	Less Than Significant With Mitigation Incorporated	☐	No Impact

Less Than Significant: Temporary and periodic increases in ambient noise from grading activities and construction of the project are addressed above in Section XIII(a). Potential impacts to noise would be less than significant with conformance to the County of San Diego General Plan Noise Element and County of San Diego Noise Ordinance (Section 36-404 and 36.410). Once the project is constructed, the resulting cemetery land uses would not result in substantial temporary or periodic increases in ambient noise as compared to adjacent residential land uses. Impacts would be less than significant.

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

☐	Potentially Significant Impact	☒	Less than Significant Impact
☐	Less Than Significant With Mitigation Incorporated	☐	No Impact

Less Than Significant Impact: The closest airports to the project site are McClellan-Palomar Airport, located approximately 3 miles southwest, and Bob Maxwell Field Oceanside Municipal Airport, located approximately 7 miles northwest. The project site is located within the Airport

Overflight Notification Area and the Airport Influence Area (Review Area 2) of the McClellan-Palomar ALUCP. However, the project site is not within noise contours of either airport. Therefore, the project would not expose people residing or working in the project area to excessive airport-related noise levels.

XIV. POPULATION AND HOUSING.

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

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Less Than Significant Impact: The proposed project would develop a phased cemetery, with an approximately 2,200-square-foot administration building, parking, a new internal circulation system, fencing surrounding the project site, parking spaces, landscaping, utility improvements, and grave sites on a 14.5-acre site in the North County Metropolitan Subregional Planning Area. Primary users of the site would be temporary in nature and are anticipated to be residents of the neighboring communities and patrons of the Roman Catholic Church; therefore, the project would not induce substantial unplanned population growth in the area. The proposed expansion is consistent with the existing land use and zoning designations for the site. The project site is located in an urbanized area and is surrounded by multi-family residences immediately to the south, rural residences to the north, institutional (i.e., library, St. Thomas More Catholic Church), commercial, and multi-family (assisted living) residences to the west, and agricultural (wholesale nursery) uses to the east. Therefore, implementation of the proposed project would not directly or indirectly induce substantial unplanned population growth, and impacts would be less than significant.

b) Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Less Than Significant Impact: The project would renovate one existing residence on the project site for reuse as an administrative office. According to the property caretaker, this existing residence is not occupied full-time. Additionally, this residence is the only habitable structure on-site; therefore, the project would not displace a substantial number of existing people or housing, and impacts would be less than significant.

XV. PUBLIC SERVICES.

a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant

environmental impacts, in order to maintain acceptable service ratios, response times or other performance service ratios, response times or other performance objectives for any of the public services:

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

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Less Than Significant Impact: The project would develop a cemetery, including conversion of an existing house to an administration building, parking, a new internal circulation (road) system, an entry gate with guard building, fencing or solid wall around the perimeter of the site, landscaping, and utility improvements. The project would not result in the need for significantly altered public services or facilities including, but not limited to, fire protection facilities, sheriff facilities, schools, or parks in order to maintain acceptable service ratios, response times, or other performance service ratios or objectives for any public services. The project is located nearby Vista Fire Protection District Station 5. According to the Service Availability Letter (Appendix J), Vista Fire Protection District facilities are currently adequate or will be adequate to serve the project, and the expected emergency travel time to the proposed project is three minutes. The San Diego County Sheriff's Department provides police protection to the project site from the Vista Station, which serves the City of Vista and the adjacent unincorporated areas. Additionally, the project site would be encompassed by fencing or solid wall around the perimeter of the site and an entry gate with gatehouse. The project is located within the Vista Unified School District, although the project does not propose any residential uses that would generate demand for school services. Further, the cemetery would not result in increased demand for existing neighborhood and regional parks or other recreational facilities, and the proposed project would be considered passive open space area. Therefore, the project would not result in the need for new or physically altered governmental facilities, the construction of which would cause a significant impact on the environment. Impacts would be less than significant.

XVI. RECREATION.

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

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Less Than Significant Impact: The project includes phased development of a cemetery, with renovation of an existing residence in an administration building, parking, a new internal circulation system, landscaping, utility improvements, and grave sites on an approximately 14.5-acre site. Surrounding land uses consist of multi-family residences immediately to the south,

rural residences to the north, institutional (i.e., library, St. Thomas More Catholic Church), commercial, and multi-family (assisted living) residences to the west, and agricultural (wholesale nursery) uses to the east. The proposed project would include extensive landscaping throughout the site that would provide passive park opportunities in the area. The use of a cemetery does not consist of additional residential uses which are typical of increasing use of neighborhood or regional parks in the area. The development of a cemetery would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. Impacts would be less than significant.

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

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☐ Less than Significant Impact
☒ No Impact

No Impact: The project does not include recreational facilities or require the construction or expansion of recreational facilities. Therefore, no impacts would occur from the project.

XVII. TRANSPORTATION.

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

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Discussion/Explanation: The County of San Diego's Transportation Study Guidelines (TSG) establish thresholds for transportation using VMT. The TSG also establish measures of effectiveness for the performance of the circulation system by incorporating standards from the County of San Diego Public Road Standards and 2011 General Plan Mobility Element.

A Phase 1 Traffic Review and Phase 2 Site Access Review were prepared for the project by Linscott, Law & Greenspan Engineers dated January 9, 2023 and October 22, 2021 respectively (Appendices M and N). The following responses have incorporated the analysis from the report.

Less Than Significant Impact: The Phase 2 Site Access Review identified that the proposed project would generate 138 average daily trips (ADT) (Appendix L). The project is expected to reduce vehicle trips from the existing traffic of 176 ADTs generated by the previous use on-site that has stopped operating during the processing of the project. As the project is not expected to increase traffic volumes, the project would not create a conflict with any performance measures because with the addition of project trips, the circulation system does not degrade to below standards established in the County's Transportation Study Guidelines. The project would not result in a substantial increase in the number of vehicle trips, volume of capacity ratio on roads, or congestion at intersections in relation to existing conditions. In addition, the project would not conflict with policies related to non-motorized travel such as mass transit, pedestrian, or bicycle facilities. The project will require the vacation of Keys Place which is currently identied as a public road in the County-maintained road system. Upon implementation of the project and

the merging of all parcels on the project site through the processing of a Certificate of Compliance/Merger, Keys Place will not be required to provide access to any additional properties. All property subject to the proposed Major Use Permit are under a single ownership and all property obtaining access from Keys Place is under the ownership of the Major Use Permit applicant. Therefore, the project would not conflict with any policies establishing measures of the effectiveness for the performance of the circulation system the project's transportation impacts would be less than significant.

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

☐	Potentially Significant Impact	☒	Less than Significant Impact
☐	Less Than Significant With Mitigation Incorporated	☐	No Impact

Discussion/Explanation: The County of San Diego's Transportation Study Guidelines (TSG) establish thresholds and screening criteria for transportation VMT.

Less Than Significant Impact: The Transportation Analysis utilized the County of San Diego Transportation Study Guidelines (TSG) approved by the Board of Supervisors in September of 2022 (incorporated herein by reference). The TSG provides criteria on how projects should be evaluated for consistency related to the County's transportation goals, policies, and plans, and through procedures established under CEQA. The TSG establishes the contents and procedures for preparing a Transportation Impact Analysis in the County of San Diego. The TSG was updated in 2022 to address legislative changes in SB 743, which changed the basis for evaluating transportation impacts in CEQA from the Level of Service (LOS) metric to the VMT metric. As noted in the TSG, "The legislative intent of SB 743 was to 'more appropriately balance the needs of congestion management with statewide goals related to infill development, promotion of public health through active transportation, and reduction of greenhouse gas (GHG) emissions.'"

As described above, the Phase 2 Site Access Review identified that the proposed project would generate 138 ADT (Appendix L). The project is expected to reduce vehicle trips from the existing traffic of 176 ADTs generated currently at the site. Therefore, the project replaces existing land uses and would reduce the total daily trip generation by 38 ADT. Additionally, Phase 1 of the project is only anticipated to generate 30 ADT.

The project site is located in an unincorporated portion of San Diego County that is surrounded by multiple municipalities and is an isolated unincorporated area. The project site is adjacent to dense residential uses within the City of Vista. The project consists of a Catholic cemetery in North County of San Diego. Due to the nature of the use of a cemetery, residents from various portions of the County are anticipated to use the cemetery with extremely infrequent trips only for funeral services and visitation. Additionally, the project is anticipated to be constructed in phases and will gradually increase over time. The operational trips of 30 ADT for Phase 1 and 138 ADT at maximum buildout of the project during Phase 2 are conservative for operational characteristics of a new cemetery as trips associated with visiting a cemetery would gradually increase over time as more burials occur at the cemetery. The phased development of the project as well as full buildout were evaluated in traffic analyses for the project (Appendix K and L). By locating a Catholic cemetery in North County in an area that is not adjacent to similar

cemeteries, it is anticipated that the cemetery would provide options for burials of the deceased and reduce lengths of trips to other cemeteries in San Diego County located away from the project site. The project site is also located approximate 1,000 feet away from the St. Thomas More Catholic church which can provide funeral and religious services that are typical of chapels and operations of Catholic cemeteries. In addition, the traffic analysis for the project estimates that the project will result in a net decrease of 84 VMT, consistent with its net decrease in daily trip generation compared to the previous operations of the site. Therefore, the project would result in a less than significant impact related to VMT, and no mitigation is required.

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

☐	Potentially Significant Impact	☐	Less than Significant Impact
☒	Less Than Significant With Mitigation Incorporated	☐	No Impact

Less Than Significant with Mitigation Incorporated: The proposed project would not significantly alter roadway geometry on Buena Vista Drive. Buena Vista Drive is classified as a Residential Collector, which is classified by two 12-foot lanes with a roadway surfacing width of 40 feet including two 8-foot shoulders, and an overall right-of-way width of 60 feet (Appendix L). Buena Vista Drive is currently built with a paved width between 24 to 28 feet in the vicinity of the project. Phase 2 of the project includes half width improvements to accommodate the ultimate roadway surfacing and right-of-way width per County standards, as recommended in the Site Access Review (Appendix L). The project would be required to ensure that safe and adequate sight distance at the intersection of Keys Place and Buena Vista Drive complies with applicable County road standards and to the satisfaction of the Director of the Department of Public Works. In order to comply with public road standards and safe access, the project would require traffic control (e.g., a stop or yield sign) at the Keys Place approach to Buena Vista Drive to ensure safety for drivers entering onto and along Buena Vista Drive. Therefore, access to the project driveway would function adequately. Improvements along Buena Vista Drive would be constructed as part of phase 2 according to the County of San Diego Public and Private Road Standards. The driveway improvements would be constructed according to the County of San Diego Public and Private Road Standards. The proposed project would not place incompatible uses (e.g., farm equipment) on existing roadways. Therefore, the proposed project would not significantly increase hazards due to design features or incompatible uses.

d) Would the project result in inadequate emergency access?

☐	Potentially Significant Impact	☒	Less than Significant Impact
☐	Less Than Significant With Mitigation Incorporated	☐	No Impact

Less Than Significant: The project would not generate traffic volumes that would impede emergency access. The proposed plans are required to comply with the County's emergency access requirements per the San Diego County Fire Code and Consolidated Fire Code, including turning radius and maneuverability of large emergency vehicles such as fire trucks and ambulances. The project also includes one-way access roads for on-site circulation. Additionally, Vista Fire Protection District Station 5 is located approximately 1.2 miles south of the project

site. Therefore, the project would not result in inadequate emergency access, and impacts would be less than significant.

XVIII. TRIBAL CULTURAL RESOURCES.

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

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

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Less Than Significant Impact: The existing buildings on-site were constructed in the 1950s and have been modified and therefore are not considered a historic resource. Existing public views of the residence are limited and screened by vegetation along the roadway. See discussion in Section V(a), for further discussion on historic resources eligibility. Impacts would be less than significant.

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

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Discussion/Explanation: As previously described, a Cultural Resources Technical Report was prepared for the project by LSA, dated September 2023 (Appendix C). As part of the Cultural Resources Report prepared for the project, a records search, a Sacred Lands File search, and pedestrian field survey of the property were conducted.

Less Than Significant Impact: LSA contacted the Native American Heritage Commission (NAHC) on September 2017, to request a Sacred Lands File search of the project site. The NAHC response for the Sacred Lands File was negative. The NAHC also provided the contact information for tribal contacts within the local community for additional consultation. A Native American Monitor from Saving Sacred Sites from the San Luis Rey Band of Mission Indians was invited to participate in the pedestrian survey of the project area.

Pursuant to AB 52, Tribal Outreach was conducted on July 14, 2021 for requests for Tribal Consultation. Staff received requests from the Rincon Band of Luiseño Indians and the San Luis Rey Band of Mission Indians. Since 2021, Staff has conducted Tribal Consultation with both

tribes. No tribal cultural resources have been identified during consultation. As such, impacts to tribal cultural resources would be less than significant.

Since 2021, the project has been revised to be constructed in phases. Consultation previously concluded with the San Luis Rey Band of Mission Indians in September of 2022 and consultation has been ongoing due to the changes in the project design to be phased. In accordance with AB 52, County Staff and the applicant received requests to include tribal and archaeological monitoring in order to ensure that potential archaeological resources would not be impacted during grading and construction operations. The project includes tribal and archaeological monitoring during ground disturbing activities such as during the Phase 1 Landscape Plan installation and the Phase 2 grading in order to allow for provisions of unanticipated discoveries of cultural resources during project implantation. Tribal consultation has not concluded with both tribes and is ongoing.

XIX. UTILITIES AND SERVICE SYSTEMS.

a) Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

☐ Potentially Significant Impact
☒ Less Than Significant With Mitigation Incorporated
☐ Less than Significant Impact
☐ No Impact

Less Than Significant with Mitigation Incorporated: The project would develop a cemetery, including conversion of an existing house to an administration building, parking, a new internal circulation (road) system, an entry gate with guard building, fencing or solid wall around the perimeter of the site, landscaping, and utility improvements. These utility improvements could cause a significant environmental effect. For example, the project would require a new sewer line connection and removal of the existing septic system that serves the residence. These impacts would be a result of ground disturbing activities and not due to the use of infrastructure for utilities. Additionally, the project is anticipate to obtain electrical service power through San Diego Gas & Electric (SDG&E) and the project site contains several SDG&E utility lines. Coordination with SDG&E throughout operations of the project are anticipated due to the proximity of potential gravesites to SDG&E utility lines. Existing leach lines for the septic tank would be pumped and removed through applicable required permits from the Department of Environmental Health and Quality (refer to Section IX, Hazards and Hazardous Materials). Implementation of Mitigation Measures BIO-1 through BIO-2, CUL-1, GEO-1, and HAZ-1 would reduce these impacts to less than significant. Refer to Section IV. Biological Resources, Section V. Cultural Resources, Section VII, Geology and Soils, and Section IX. Hazards and Hazardous Materials for further discussion. Therefore, the project would not result in any new significant environmental effects or a substantial increase in the severity of previously identified significant effects regarding the
construction or relocation of utilities.

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

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Less Than Significant Impact: The project site is served by Vista Irrigation District. Minimal water would be required during project construction for dust control and suppression. Operation of the project would require water for landscaping and the administrative office. Water use required for the proposed project would be consistent with or less than operational water demand for the project site's existing zoning of agricultural uses. Therefore, the project is integrated into Vista Irrigation District's current and future water projections. Further, the Vista Irrigation District has provided a service availability form indicating they have sufficient water supplies available to serve the project and other development during normal, dry and multiple dry years. Therefore, impacts would be less than significant.

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

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Less Than Significant Impact: The project would develop a cemetery, including conversion of an existing house to an administration building, parking, a new internal circulation (road) system, fencing or solid wall around the perimeter of the site, landscaping, and utility improvements. Wastewater from the project site is currently conveyed via a network of collector pipes, trunk lines, and pump stations to the Escondido-Vista Water Treatment Plant for wastewater treatment. The project would not substantially increase wastewater generation on-site, and all stormwater runoff would be conveyed to one of two proposed biofiltration basins on-site (refer to Section X, Hydrology and Water Quality). The Escondido-Vista Water Treatment Plant currently has the capacity to produce 75 million gallons of potable water per day (gpd) (Vista Irrigation District 2024). Therefore, the project would not interfere with any wastewater treatment providers service capacity. Impacts would be less than significant.

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

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Less Than Significant Impact: The proposed project would develop a cemetery, including conversion of an existing house to an administration building, parking, a new internal circulation (road) system, an entry gate with guard building, fencing or solid wall around the perimeter of the site, landscaping, and utility improvements, which would result in long-term operational solid waste generation. There are five, permitted active landfills in San Diego County with remaining capacity, including Borrego Landfill (111,504 cubic yards [cy] remaining capacity), Otay Landfill (21,194,008 cy remaining capacity), West Miramar Sanitary Landfill (11,080,871 cy remaining

capacity), Sycamore Landfill (113,972,637 cy remaining capacity), San Onofre Landfill (1,057,605 cy remaining capacity), and Las Pulgas Landfill (9,503,985 cy remaining capacity). Therefore, there is sufficient existing permitted solid waste capacity to accommodate the project's solid waste disposal needs and the project would not impair the attainment of solid waste reduction goals, and impacts would be less than significant.

e) Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

☐ Potentially Significant Impact ☒ Less than Significant Impact
☐ Less Than Significant With Mitigation Incorporated ☐ No Impact

Less than Significant Impact: The proposed project would develop a cemetery, including conversion of an existing house to an administration building, parking, a new internal circulation (road) system, an entry gate with guard building, fencing or solid wall around the perimeter of the site, landscaping, and utility improvements. All solid waste facilities, including landfills, require solid waste facility permits to operate. In San Diego County, the County Department of Environmental Health, Local Enforcement Agency, issues solid waste facility permits with concurrence from CalRecycle under the authority of the Public Resources Code (Sections 44001-44018) and California Code of Regulations Title 27, Division 2, Subdivision 1, Chapter 4 (Section 21440et seq.). The County requires recycling of 90 percent of inerts and 70 percent of all other materials from construction projects, per County Ordinance Section 68.508 through 68.518 (Diversion of Construction and Demolition Materials from Landfill Disposal). The project would be in compliance with County ordinances upon submission of a Construction and Demolition Debris Management Plan prior to the issuance of a building permit. Project operations and waste management methods would be consistent with the County's Strategic Plan to Reduce Waste (2017) through the support of commercial composting programs to reduce organic waste and comply with established waste diversion requirements (refer to Section VIII. Greenhouse Gas Emissions). The project would deposit all solid waste at a permitted solid waste facility, and therefore, would comply with federal, state, and local statutes and regulations related to solid waste.

XX. WILDFIRE.

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

a) Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

☐ Potentially Significant Impact ☒ Less than Significant Impact
☐ Less Than Significant With Mitigation Incorporated ☐ No Impact

Discussion/Explanation: The project site is not located within a high or very high FHSZ; therefore, the project is not required to prepare a Fire Protection Plan.

Less Than Significant Impact: The project would be served by the Vista Fire Protection District Station 5, approximately 1.2 miles south of the project site. Adequate fire service is demonstrated

through the Fire Service Availability Forms provided for the project. As described in Section IX(e), the project would not substantially impair an adopted emergency response plan or evacuation plan. The proposed project would develop a cemetery, including conversion of an existing house to an administration building, parking, a new internal circulation (road) system, an entry gate with guard building, fencing or solid wall around the perimeter of the site, landscaping, and utility improvements on an approximately 14.5-acre site. The access gate to the project site will be equipped with an override switch for fire access to be managed by the local fire protection district. The project does not include any no growth-inducing project components since the anticipated visitors would be located within the region and would not increase population growth. Therefore, no substantial demand beyond current conditions is required for emergency response. Access to the project site would be at Keys Place from Buena Vista Drive. Project access would comply with County road standards (e.g., road and street grade below 20 percent, paved streets with capacity to support up to 75,000 pounds, etc.). Therefore, the project would not substantially impair an adopted emergency response plan or emergency evacuation plan, and impacts would be less than significant.

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

☐	Potentially Significant Impact	☒	Less than Significant Impact
☐	Less Than Significant With Mitigation Incorporated	☐	No Impact

Less Than Significant Impact: The project site is not within an identified FHSZ. Given that the majority of the County is in the high and very high FHSZ, the County has implemented fire safety measures depending on specific factors, such as location, vegetation, etc. Homes near the project site and their compliance with fuel modification requirements lower the fire threat and risk to the proposed project. The project proposes installing maintained landscaping that can provide fire buffers, and is required to meet applicable fire measures, such as fire apparatus access and access road requirements. To ensure the project does not exacerbate wildfire risks, the project would be required to include non-combustible roofing and non-combustible or standard fire-resistive building materials, per the Vista Fire Protection District requirements. Therefore, the project would not expose project occupants, such as employees or residents, to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. Additionally, Vista Fire Protection District Station 5 is located approximately 1.2 miles south of the project site. Impacts would be less than significant.

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

☐	Potentially Significant Impact	☒	Less than Significant Impact
☐	Less Than Significant With Mitigation Incorporated	☐	No Impact

Less Than Significant Impact: The proposed project would develop a phased cemetery, with an approximately 2,200-square-foot administration building, parking, a new internal circulation

system, fencing surrounding the project site, parking spaces, landscaping, utility improvements, and grave sites on a 14.5-acre site in the North County Metropolitan Subregional Planning Area and does not propose any structures or additional infrastructure that would exacerbate fire risk. Development and operation of the proposed project would be required to comply with the County Fire Code and Consolidated Fire Code, and compliance with the Vista Fire Protection District's requirements. Therefore, based on project coordination with County staff and compliance with the County's and Vista Fire Protection District's requirements, impacts associated with fire risk would be less than significant.

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

☐ Potentially Significant Impact
☐ Less Than Significant With Mitigation Incorporated
☒ Less than Significant Impact
☐ No Impact

Less Than Significant Impact: The proposed project would develop a phased cemetery, with an approximately 2,200-square-foot administration building, parking, a new internal circulation system, fencing surrounding the project site, parking spaces, landscaping, utility improvements, and grave sites on a 14.5-acre site in the North County Metropolitan Subregional Planning Area. As described in Section X, Hydrology, the project site is not located in a floodplain or prone to flooding. All stormwater runoff from the project site would be conveyed to one of two proposed biofiltration basins on-site. Therefore, the project site would not be prone to onsite flooding following construction of the project. In addition, project grading also must conform to the grading requirements outlined in the County Grading Ordinance and be verified in the field by a licensed or registered Civil Engineer and inspected by County Grading Inspectors. Due to the aforementioned factors, the project site would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. Impacts are less than significant.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE:

a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

☐ Potentially Significant Impact
☒ Less Than Significant With Mitigation Incorporated
☐ Less than Significant Impact
☐ No Impact

Less Than Significant with Mitigation Incorporated: The potential of the project to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory were considered in Section IV and Section V of this Initial Study. In addition to project-specific impacts, this evaluation considered the project's potential for significant cumulative effects. Resources that have been evaluated as significant would be potentially impacted by the project. However, mitigation has been included that clearly reduces these effects to a level below significance. Please see Section IV, Section V, Section VII, and Section IX above. This mitigation includes nesting bird and bat surveys, procedures for encountering human remains, tribal and archaeological monitoring, monitoring for paleontological resources, and procedures for encountering contaminated soils during construction**.** As a result of this evaluation, there is no substantial evidence that, after mitigation, significant effects associated with this project would result. Therefore, this project has been determined not to meet this Mandatory Finding of Significance.

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

☐ Potentially Significant Impact
☒ Less Than Significant With Mitigation Incorporated
☐ Less than Significant Impact
☐ No Impact

Less Than Significant with Mitigation Incorporated: The following list of past, present and future projects were considered and evaluated as a part of this Initial Study:

PROJECT NAME	PERMIT/MAP NUMBER	DETAILS
Stonemark Estates	TM 5479	Residential development for 19 residential lots on an approximately 25.77 acre parcel. The project has been constructed in the last 5 years.

Wildgrove	Map 13022	Residential Development for 29 residential within the City of Vista. The project has been constructed in the last 5 years.
Gamboni Ranch	TM 5241	Residential Lot for approximately 34 residential lots. The project has been constructed in the last 15 to 20 years.

The potential for adverse cumulative effects were considered in Sections I through XX of Initial Study. In addition to project-specific impacts, this evaluation considered the project's potential for incremental effects that are cumulatively considerable. As a result of this evaluation, and in consideration of all mitigation required by the project, there were determined to be no potentially significant cumulative effects the project would have a considerable contribution to. Mitigation has been included for project impacts that clearly reduces any potential for a considerable contribution to any cumulative effects to a level below significance. Please refer to Section IV. *Biological Resources*, Section V. *Cultural Resources*, Section VII. Geology and Soils, and Section IX. *Hazards and Hazardous Materials* above. This mitigation includes but is not limited to nesting bird surveys, cultural monitoring and reporting, soil remediation, and temporary sound barriers during construction. As a result of this evaluation, there is no substantial evidence that, after mitigation, the project would have any considerable contribution to a cumulative impact. Therefore, this project has been determined not to meet this Mandatory Finding of Significance.

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

☐ Potentially Significant Impact
☒ Less Than Significant With Mitigation Incorporated
☐ Less than Significant Impact
☐ No Impact

Less Than Significant with Mitigation Incorporated: In the evaluation of environmental impacts in this Initial Study, the potential for adverse direct or indirect impacts to human beings were considered in Section I. *Aesthetics*, Section III. *Air Quality*, Section VII. *Geology and Soils*, Section IX. *Hazards and Hazardous Materials*, Section X. *Hydrology and Water Quality*, Section XIII. *Noise*, Section XIV. *Population and Housing*, and Section XVII. *Transportation*. As a result of this evaluation, there were determined to be potentially significant effects to human beings related to potential hazardous materials. However, mitigation has been included that clearly reduces these effects to a level below significance. This mitigation includes soil remediation in the event that contaminated soils are encountered. As a result of this evaluation, there is no substantial evidence that, after mitigation, there are adverse effects to human beings associated with this project. Therefore, this project has been determined not to meet this Mandatory Finding of Significance.

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

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

Project Specific References:

Appendix A – Air Quality Analysis Report
Air Quality Analysis Report, LSA Associates, Inc., March 2022

Appendix B – Biological Resources Letter Report
Biological Resources Letter Report, LSA Associates, Inc., April 2021

Appendix C – Cultural Resources Technical Report
Negative Cultural Resources Survey Report,

Appendix D – Greenhouse Gas CalEEMod Results
CalEEMod Results, Ascent Environmental, March 14, 2024

Appendix E – Phase I Environmental Site Assessment
Phase 1 Environmental Site Assessment, Ninyo & Moore, April 26, 2019

Appendix F – Phase II Environmental Site Assessment
Phase 2 Environmental Site Assessment, Ninyo & Moore, October 15, 2020

Appendix G – Priority Development Project Stormwater Quality Management Plan
Priority Development Project Stormwater Quality Management Plan, Chang Consultants, January 11, 2024

Appendix H – Phase 1 Drainage Certification Letter and Drainage Study
Phase 1 Drainage Certification Letter, Chang Consultants, January 11, 2024 and CEQA Drainage Study for Good Shepherd Catholic Cemetery, November 16, 2021

Appendix I – Noise Report
Focused Noise Analysis for Good Shepherd Cemetery, Eilar Associates, Inc., September 24, 2021

Appendix J – Service Availability Letters
Project Facility Availability – Fire, Vista Fire Protection District, October 11, 2019
Project Facility Availability – Sewer, Buena Sanitation District, March 12, 2020
Project Facility Availability – School, Vista Unified School District, April 2020
Project Facility Availability – Water, Vista Irrigation District, September 2019

Appendix K – Phase 1 Transportation Analysis
Phase 1 Traffic Review, Linscott, Law, & Greenspan, Engineers, January 9, 2023

Appendix L – Phase 2 Transportation Analysis
Site Access Review, Linscott, Law, & Greenspan, Engineers, October 22, 2021

California Air Resources Board (CARB). 2017. California's 2017 Climate Change Scoping Plan. December 14, 2017. https://ww3.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf.

California Department of Conservation. 2022. CGS Seismic Hazards Program: Fault Traces. https://maps-cnra-cadoc.opendata.arcgis.com/datasets/cadoc::cgs-seismic-hazards-program-fault-traces/explore?location=32.869270%2C-116.877257%2C10.77.

California Department of Transportation (Caltrans). 2020. Transportation and Construction Vibration Guidance Manual. (CT-HWANP-RT-13-069.25.3) April. Available at: https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/tcvgm-apr2020-a11y.pdf.

Office of Environmental Health Hazard Assessment (OEHHA). 2015. Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments. Available at: https://oehha.ca.gov/air/crnr/notice-adoption-air-toxics-hot-spots-program-guidance-manual-preparation-health-risk-0.

State Water Resources Control Board. 2021. Water Quality Control Plan for the San Diego Basin, Chapter 2: Beneficial Uses. https://www.waterboards.ca.gov/sandiego/water_issues/programs/basin_plan/docs/chapter_2.pdf.

AESTHETICS

California Street and Highways Code [California Street and Highways Code, Section 260-283. (http://www.leginfo.ca.gov/)

California Scenic Highway Program, California Streets and Highways Code, Section 260-283. (http://www.dot.ca.gov/hq/LandArch/scenic/scpr.htm)

County of San Diego, Planning & Development Services. The Zoning Ordinance of San Diego County. Sections 5200-5299; 5700-5799; 5900-5910, 6322-6326. ((www.co.san-diego.ca.us)

County of San Diego, Board Policy I-73: Hillside Development Policy. (www.co.san-diego.ca.us)

County of San Diego, Board Policy I-104: Policy and Procedures for Preparation of Community Design Guidelines, Section 396.10 of the County Administrative Code and Section 5750 et seq. of the County Zoning Ordinance. (www.co.san-diego.ca.us)

County of San Diego Light Pollution Code, Title 5, Division 9 (Sections 59.101-59.115 of the County Code of Regulatory Ordinances) as added by Ordinance No 6900, effective January 18, 1985, and amended July 17, 1986 by Ordinance No. 7155. (www.amlegal.com)

County of San Diego Wireless Communications Ordinance [San Diego County Code of Regulatory Ordinances. (www.amlegal.com)

Design Review Guidelines for the Communities of San Diego County. (Alpine, Bonsall, Fallbrook, Julian, Lakeside, Ramona, Spring Valley, Sweetwater, Valley Center).

Federal Communications Commission, Telecommunications Act of 1996 [Telecommunications Act of 1996, Pub. LA. No. 104-104, 110 Stat. 56 (1996). (http://www.fcc.gov/Reports/tcom1996.txt)

Institution of Lighting Engineers, Guidance Notes for the Reduction of Light Pollution, Warwickshire, UK, 2000 (http://www.dark-skies.org/ile-gd-e.htm)

International Light Inc., Light Measurement Handbook, 1997. (www.intl-light.com)

Rensselaer Polytechnic Institute, Lighting Research Center, National Lighting Product Information Program (NLPIP), Lighting Answers, Volume 7, Issue 2, March 2003. (www.lrc.rpi.edu)

US Census Bureau, Census 2000, Urbanized Area Outline Map, San Diego, CA. (http://www.census.gov/geo/www/maps/ua2kmaps.htm)

US Department of the Interior, Bureau of Land Management (BLM) modified Visual Management System. (www.blm.gov)

US Department of Transportation, Federal Highway Administration (FHWA) Visual Impact Assessment for Highway Projects.

US Department of Transportation, National Highway System Act of 1995 [Title III, Section 304. Design Criteria for the National

Highway System. (http://www.fhwa.dot.gov/legsregs/nhsdatoc.html)

AGRICULTURE RESOURCES

California Department of Conservation, Farmland Mapping and Monitoring Program, "A Guide to the Farmland Mapping and Monitoring Program," November 1994. (www.consrv.ca.gov)

California Department of Conservation, Office of Land Conversion, "California Agricultural Land Evaluation and Site Assessment Model Instruction Manual," 1997. (www.consrv.ca.gov)

California Farmland Conservancy Program, 1996. (www.consrv.ca.gov)

California Land Conservation (Williamson) Act, 1965. (www.ceres.ca.gov, www.consrv.ca.gov)

California Right to Farm Act, as amended 1996. (www.qp.gov.bc.ca)

County of San Diego Agricultural Enterprises and Consumer Information Ordinance, 1994, Title 6, Division 3, Ch. 4. Sections 63.401-63.408. (www.amlegal.com)

County of San Diego, Department of Agriculture, Weights and Measures, "2002 Crop Statistics and Annual Report," 2002. (www.sdcounty.ca.gov)

United States Department of Agriculture, Natural Resource Conservation Service LESA System. (www.nrcs.usda.gov, www.swcs.org).

United States Department of Agriculture, Soil Survey for the San Diego Area, California. 1973. (soils.usda.gov)

AIR QUALITY

CEQA Air Quality Analysis Guidance Handbook, South Coast Air Quality Management District, Revised November 1993. (www.aqmd.gov)

County of San Diego Air Pollution Control District's Rules and Regulations, updated August 2003. (www.co.san-diego.ca.us)

Federal Clean Air Act US Code; Title 42; Chapter 85 Subchapter 1. (www4.law.cornell.edu)

BIOLOGY

California Department of Fish and Wildlife (CDFW). Southern California Coastal Sage Scrub Natural Community Conservation Planning Process Guidelines. CDFW and California Resources Agency, Sacramento, California. 1993. (www.dfg.ca.gov)

County of San Diego, An Ordinance Amending the San Diego County Code to Establish a Process for Issuance of the Coastal Sage Scrub Habitat Loss Permits and Declaring the Urgency Thereof to Take Effect Immediately, Ordinance No. 8365. 1994, Title 8, Div 6, Ch. 1. Sections 86.101-86.105, 87.202.2. (www.amlegal.com)

County of San Diego, Biological Mitigation Ordinance, Ord. Nos. 8845, 9246, 1998 (new series). (www.co.san-diego.ca.us)

County of San Diego, Implementing Agreement by and between United States Fish and Wildlife Service, California Department of Fish and Wildlife and County of San Diego. County of San Diego, Multiple Species Conservation Program, 1998.

County of San Diego, Multiple Species Conservation Program, County of San Diego Subarea Plan, 1997.

Holland, R.R. Preliminary Descriptions of the Terrestrial Natural Communities of California. State of California, Resources Agency, Department of Fish and Wildlife, Sacramento, California, 1986.

Memorandum of Understanding [Agreement Between United States Fish and Wildlife Service (USFWS), California Department of Fish and Wildlife (CDFW), California Department of Forestry and Fire Protection (CDF), San Diego County Fire Chief's Association and the Fire District's Association of San Diego County.

Stanislaus Audubon Society, Inc. v County of Stanislaus (5th Dist. 1995) 33 Cal.App.4th 144, 155-159 [39 Cal. Rptr.2d 54]. (www.ceres.ca.gov)

U.S. Army Corps of Engineers Environmental Laboratory. Corps of Engineers Wetlands Delineation Manual. U.S. Army Corps of Engineers, Wetlands Research Program Technical Report Y-87-1. 1987. (http://www.wes.army.mil/)

U.S. Environmental Protection Agency. America's wetlands: our vital link between land and water. Office of Water, Office of Wetlands, Oceans and Watersheds. EPA843-K-95-001. 1995b. (www.epa.gov)

U.S. Fish and Wildlife Service and National Marine Fisheries Service. Habitat Conservation Planning Handbook. Department of Interior, Washington, D.C. 1996. (endangered.fws.gov)

U.S. Fish and Wildlife Service and National Marine Fisheries Service. Consultation Handbook: Procedures for Conducting Consultation and Conference Activities Under Section 7 of the Endangered Species Act. Department of Interior, Washington, D.C. 1998. (endangered.fws.gov)

U.S. Fish and Wildlife Service. Environmental Assessment and Land Protection Plan for the Vernal Pools Stewardship Project. Portland, Oregon. 1997.

U.S. Fish and Wildlife Service. Vernal Pools of Southern California Recovery Plan. U.S. Department of Interior, Fish and Wildlife Service, Region One, Portland, Oregon, 1998. (ecos.fws.gov)

U.S. Fish and Wildlife Service. Birds of conservation concern 2002. Division of Migratory. 2002. (migratorybirds.fws.gov)

CULTURAL RESOURCES

California Health & Safety Code. §18950-18961, State Historic Building Code. (www.leginfo.ca.gov)

California Health & Safety Code. §5020-5029, Historical Resources. (www.leginfo.ca.gov)

California Health & Safety Code. §7050.5, Human Remains. (www.leginfo.ca.gov)

California Native American Graves Protection and Repatriation Act, (AB 978), 2001. (www.leginfo.ca.gov)

California Public Resources Code §5024.1, Register of Historical Resources. (www.leginfo.ca.gov)

California Public Resources Code. §5031-5033, State Landmarks. (www.leginfo.ca.gov)

California Public Resources Code. §5097-5097.6, Archaeological, Paleontological, and Historic Sites. (www.leginfo.ca.gov)

California Public Resources Code. §5097.9-5097.991, Native American Heritage. (www.leginfo.ca.gov)

City of San Diego. Paleontological Guidelines. (revised) August 1998.

County of San Diego, Local Register of Historical Resources (Ordinance 9493), 2002. (www.co.san-diego.ca.us)

Demere, Thomas A., and Stephen L. Walsh. Paleontological Resources San Diego County. Department of Paleontology, San Diego Natural History Museum. 1994.

Moore, Ellen J. Fossil Mollusks of San Diego County. San Diego Society of Natural history. Occasional; Paper 15. 1968.

U.S. Code including: American Antiquities Act (16 USC §431-433) 1906. Historic Sites, Buildings, and Antiquities Act (16 USC §461-467), 1935. Reservoir Salvage Act (16 USC §469-469c) 1960. Department of Transportation Act (49 USC §303) 1966. National Historic Preservation Act (16 USC §470 et seq.) 1966. National Environmental Policy Act (42 USC §4321) 1969. Coastal Zone Management Act (16 USC §1451) 1972. National Marine Sanctuaries Act (16 USC §1431) 1972. Archaeological and Historical Preservation Act (16 USC §469-469c) 1974. Federal Land Policy and Management Act (43 USC §35) 1976. American Indian Religious Freedom Act (42 USC §1996 and 1996a) 1978. Archaeological Resources Protection Act (16 USC §470aa-mm) 1979. Native American Graves Protection and Repatriation Act (25 USC §3001-3013) 1990. Intermodal Surface Transportation Efficiency Act (23 USC §101, 109) 1991. American Battlefield Protection Act (16 USC 469k) 1996. (www4.law.cornell.edu)

GEOLOGY & SOILS

California Department of Conservation, Division of Mines and Geology, California Alquist-Priolo Earthquake Fault Zoning Act, Special Publication 42, Revised 1997. (www.consrv.ca.gov)

California Department of Conservation, Division of Mines and Geology, Fault-Rupture Hazard Zones in California, Special Publication 42, revised 1997. (www.consrv.ca.gov)

California Department of Conservation, Division of Mines and Geology, Special Publication 117, Guidelines for Evaluating and Mitigating Seismic Hazards in California, 1997. (www.consrv.ca.gov)

County of San Diego Code of Regulatory Ordinances Title 6, Division 8, Chapter 3, Septic Ranks and Seepage Pits. (www.amlegal.com)

County of San Diego Department of Environmental Health, Land and Water Quality Division, February 2002. On-site Wastewater Systems (Septic Systems): Permitting Process and Design Criteria. (www.sdcounty.ca.gov)

County of San Diego Natural Resource Inventory, Section 3, Geology.

United States Department of Agriculture, Soil Survey for the San Diego Area, California. 1973. (soils.usda.gov)

GREENHOUSE GAS EMISSIONS

California Air Resources Board 2022 Scoping Plan for Achieving Carbon Neutrality, December 2022 (https://ww2.arb.ca.gov/our-work/programs/ab-32-climate-change-scoping-plan/2022-scoping-plan-documents)

County of San Diego. (2012). www.sandiegocounty.gov. Retrieved March 26, 2017, from http://www.sandiegocounty.gov/pds/zoning/z2000.pdf

County of San Diego. (2017). Draft County of San Diego Guidlines for Determining Significance - Climate Change.

SCAQMD. (2008). Interim CEQA GHG Significance Threshold for Stationary. Retrieved from http://www.aqmd.gov/docs/default-source/ceqa/handbook/greenhouse-gases-(ghg)-ceqa-significance-thresholds/ghgboardsynopsis.pdf?sfvrsn=2

HAZARDS & HAZARDOUS MATERIALS

American Planning Association, Zoning News, "Saving Homes from Wildfires: Regulating the Home Ignition Zone," May 2001.

California Building Code (CBC), Seismic Requirements, Chapter 16 Section 162. (www.buildersbook.com)

California Education Code, Section 17215 and 81033. (www.leginfo.ca.gov)

California Government Code. § 8585-8589, Emergency Services Act. (www.leginfo.ca.gov)

California Hazardous Waste and Substances Site List. April 1998. (www.dtsc.ca.gov)

California Health & Safety Code Chapter 6.95 and §25117 and §25316. (www.leginfo.ca.gov)

California Health & Safety Code § 2000-2067. (www.leginfo.ca.gov)

California Health & Safety Code. §17922.2. Hazardous Buildings. (www.leginfo.ca.gov)

California Public Utilities Code, SDCRAA. Public Utilities Code, Division 17, Sections 170000-170084. (www.leginfo.ca.gov)

California Resources Agency, "OES Dam Failure Inundation Mapping and Emergency Procedures Program", 1996. (ceres.ca.gov)

County of San Diego, Department of Environmental Health, Hazardous Materials Division. California Accidental Release Prevention Program (CalARP) Guidelines. (http://www.sdcounty.ca.gov/, www.oes.ca.gov)

County of San Diego, Department of Environmental Health, Hazardous Materials Division. Hazardous Materials Business Plan Guidelines. (www.sdcounty.ca.gov)

Uniform Building Code. (www.buildersbook.com)

Uniform Fire Code 1997 edition published by the Western Fire Chiefs Association and the International Conference of Building Officials, and the National Fire Protection Association Standards 13 &13-D, 1996 Edition, and 13-R, 1996 Edition. (www.buildersbook.com)

HYDROLOGY & WATER QUALITY

American Planning Association, Planning Advisory Service Report Number 476 Non-point Source Pollution: A Handbook for Local Government

California Department of Water Resources, California Water Plan Update. Sacramento: Dept. of Water Resources State of California. 1998. (rubicon.water.ca.gov)

California Department of Water Resources, California's Groundwater Update 2003 Bulletin 118, April 2003. (www.groundwater.water.ca.gov)

California Department of Water Resources, Water Facts, No. 8, August 2000. (www.dpla2.water.ca.gov)

California Disaster Assistance Act. Government Code, § 8680-8692. (www.leginfo.ca.gov)

California State Water Resources Control Board, NPDES General Permit Nos. CAS000001 INDUSTRIAL ACTIVITIES (97-03-DWQ) and CAS000002 Construction Activities (No. 99-08-DWQ) (www.swrcb.ca.gov)

California Storm Water Quality Association, California Storm Water Best Management Practice Handbooks, 2003.

California Water Code, Sections 10754, 13282, and 60000 et seq. (www.leginfo.ca.gov)

Colorado River Basin Regional Water Quality Control Board, Region 7, Water Quality Control Plan. (www.swrcb.ca.gov)

County of San Diego Regulatory Ordinance, Title 8, Division 7, Grading Ordinance. Grading, Clearing and Watercourses. (www.amlegal.com)

County of San Diego, Groundwater Ordinance. #7994. (www.sdcounty.ca.gov, http://www.amlegal.com/,)

County of San Diego, Project Clean Water Strategic Plan, 2002. (www.projectcleanwater.org)

County of San Diego, Watershed Protection, Storm Water Management, and Discharge Control Ordinance, Ordinance Nos. 9424 and 9426. Chapter 8, Division 7, Title 6 of the San Diego County Code of Regulatory Ordinances and amendments. (www.amlegal.com)

County of San Diego. Board of Supervisors Policy I-68. Diego Proposed Projects in Flood Plains with Defined Floodways. (www.co.san-diego.ca.us)

Federal Water Pollution Control Act (Clean Water Act), 1972, Title 33, Ch.26, Sub-Ch.1. (www4.law.cornell.edu)

Freeze, Allan and Cherry, John A., Groundwater, Prentice-Hall, Inc. New Jersey, 1979.

Heath, Ralph C., Basic Ground-Water Hydrology, United States Geological Survey Water-Supply Paper; 2220, 1991.

National Flood Insurance Act of 1968. (www.fema.gov)

National Flood Insurance Reform Act of 1994. (www.fema.gov)

Porter-Cologne Water Quality Control Act, California Water Code Division 7. Water Quality. (ceres.ca.gov)

San Diego Association of Governments, Water Quality Element, Regional Growth Management Strategy, 1997. (www.sandag.org

San Diego Regional Water Quality Control Board, NPDES Permit No. CAS0108758. (www.swrcb.ca.gov)

San Diego Regional Water Quality Control Board, Water Quality Control Plan for the San Diego Basin. (https://www.waterboards.ca.gov/sandiego/water_issues/programs/basin_plan/docs/R9_Basin_Plan.pdf)

LAND USE & PLANNING

California Department of Conservation Division of Mines and Geology, Open File Report 96-04, Update of Mineral Land Classification: Aggregate Materials in the Western San Diego County Production Consumption Region, 1996. (www.consrv.ca.gov)

California Environmental Quality Act, Public Resources Code 21000-21178; California Code of Regulations, Guidelines for Implementation of CEQA, Appendix G, Title 14, Chapter 3, §15000-15387. (www.leginfo.ca.gov)

California State Mining and Geology Board, SP 51, California Surface Mining and Reclamation Policies and Procedures, January 2000. (www.consrv.ca.gov)

County of San Diego, Board of Supervisors Policy I-84: Project Facility. (www.sdcounty.ca.gov)

County of San Diego, Board Policy I-38, as amended 1989. (www.sdcounty.ca.gov)

County of San Diego, General Plan as adopted August 3, 2011. (ceres.ca.gov)

County of San Diego. Resource Protection Ordinance, compilation of Ord.Nos. 7968, 7739, 7685 and 7631. 1991.

Design Review Guidelines for the Communities of San Diego County.

MINERAL RESOURCES

National Environmental Policy Act, Title 42, 36.401 et. seq. 1969. (www4.law.cornell.edu)

Subdivision Map Act, 2011. (ceres.ca.gov)

U.S. Geologic Survey, Causey, J. Douglas, 1998, MAS/MILS Mineral Location Database.

U.S. Geologic Survey, Frank, David G., 1999, (MRDS) Mineral Resource Data System.

NOISE

California State Building Code, Part 2, Title 24, CCR, Appendix Chapter 3, Sound Transmission Control, 1988. . (www.buildersbook.com)

County of San Diego Code of Regulatory Ordinances, Title 3, Div 6, Chapter 4, Noise Abatement and Control, effective February 4, 1982. (www.amlegal.com)

County of San Diego General Plan, Noise Element, effective August 3, 2011. (ceres.ca.gov)

Federal Aviation Administration, Federal Aviation Regulations, Part 150 Airport Noise Compatibility Planning (revised January 18, 1985). (http://www.access.gpo.gov/)

Harris Miller Miller and Hanson Inc., *Transit Noise and Vibration Impact Assessment*, April 1995. (http://ntl.bts.gov/data/rail05/rail05.html)

International Standard Organization (ISO), ISO 362; ISO 1996 1-3; ISO 3095; and ISO 3740-3747. (www.iso.ch)

U.S. Department of Transportation, Federal Highway Administration, Office of Environment and Planning, Noise and Air Quality Branch. "Highway Traffic Noise Analysis and Abatement Policy and Guidance," Washington, D.C., June 1995. (http://www.fhwa.dot.gov/)

POPULATION & HOUSING

Housing and Community Development Act of 1974, 42 USC 5309, Title 42--The Public Health And Welfare, Chapter 69--Community Development, United States Congress, August 22, 1974. (www4.law.cornell.edu)

National Housing Act (Cranston-Gonzales), Title 12, Ch. 13. (www4.law.cornell.edu)

San Diego Association of Governments Population and Housing Estimates, November 2000. (www.sandag.org)

US Census Bureau, Census 2000. (http://www.census.gov/)

RECREATION

County of San Diego Code of Regulatory Ordinances, Title 8, Division 10, Chapter PLDO, §810.101 et seq. Park Lands Dedication Ordinance. (www.amlegal.com)

TRANSPORTATION/TRAFFIC

California Aeronautics Act, Public Utilities Code, Section 21001 et seq. (www.leginfo.ca.gov)

California Department of Transportation, Division of Aeronautics, California Airport Land Use Planning Handbook, January 2002.

California Department of Transportation, Environmental Program Environmental Engineering – Noise, Air Quality, and Hazardous Waste Management Office. "Traffic Noise Analysis Protocol for New Highway Construction and Reconstruction Projects," October 1998. (www.dot.ca.gov)

California Public Utilities Code, SDCRAA. Public Utilities Code, Division 17, Sections 170000-170084. (www.leginfo.ca.gov)

California Street and Highways Code. California Street and Highways Code, Section 260-283. (www.leginfo.ca.gov)

County of San Diego, Alternative Fee Schedules with Pass-By Trips Addendum to Transportation Impact Fee Reports, March 2005. (http://www.sdcounty.ca.gov/dpw/land/pdf/TransImpactFee/attacha.pdf)

County of San Diego Transportation Impact Fee Report. January 2005. (http://www.sdcounty.ca.gov/dpw/permits-forms/manuals.html)

Fallbrook & Ramona Transportation Impact Fee Report, County of San Diego, January 2005. (http://www.sdcounty.ca.gov/dpw/permits-forms/manuals.html)

Office of Planning, Federal Transit Administration, Transit Noise and Vibration Impact Assessment, Final Report, April 1995.

San Diego Association of Governments, 2020 Regional Transportation Plan. Prepared by the San Diego Association of Governments. (www.sandag.org)

San Diego County Regional Airport Authority ALUCP'S http://www.san.org/sdcraa/airport_initiatives/land_use/adopted_docs.aspx

US Code of Federal Regulations, Federal Aviation Regulations (FAR), Objects Affecting Navigable Airspace, Title 14, Chapter 1, Part 77. (www.gpoaccess.gov)

UTILITIES & SERVICE SYSTEMS

2020 Urban Water Management Plan, Helix Water District, July 2021.

California Code of Regulations (CCR), Title 14. Natural Resources Division, California Integrated Waste Management Board Division 7; and Title 27, Environmental Protection Division 2, Solid Waste. (ccr.oal.ca.gov)

California Integrated Waste Management Act. Public Resources Code, Division 30, Waste Management, Sections 40000-41956. (www.leginfo.ca.gov)

County of San Diego, Board of Supervisors Policy I-78: Small Wastewater. (www.sdcounty.ca.gov)

Unified San Diego County Emergency Services Organization Annex T Emergency Water Contingencies, October 1992. (www.co.san-diego.ca.us)

United States Department of Agriculture, Natural Resource Conservation Service LESA System.

United States Department of Agriculture, Soil Survey for the San Diego Area, California. 1973.

US Census Bureau, Census 2000.

US Code of Federal Regulations, Federal Aviation Regulations (FAR), Objects Affecting Navigable Airspace, Title 14, Chapter 1, Part 77.

US Department of the Interior, Bureau of Land Management (BLM) modified Visual Management System.

US Department of Transportation, Federal Highway Administration (FHWA) Visual Impact Assessment for Highway Projects.