



County of San Diego

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

INTRODUCTION

Background and Prior Environmental Analysis

Approved 15183 Checklist for the Previously Approved Project

In December 2019, the County of San Diego Planning Commission approved the Ocean Breeze Ranch project (previously approved project) and the accompanying Statement of Reasons for Exemption From Additional Environmental Review and 15183 Checklist (15183 Checklist). California Public Resources Code Section 21083.3 and Section 15183 of the California Environmental Quality Act (CEQA) Guidelines provide an exemption from additional environmental review for projects that are consistent with the development density established by existing zoning, community plan or general plan policies for which an Environmental Impact Report (EIR) was certified, except as might be necessary to examine whether there are project-specific significant effects which are peculiar to the project or its site. The 15183 Checklist documented that the County of San Diego General Plan Update Program EIR (GPU EIR), which was certified in conjunction with adoption of the GPU on August 3, 2011, adequately anticipated and described the impacts of the previously approved project and identified applicable mitigation measures necessary to reduce project-specific impacts.

15183 Additional Analysis for the Modified Project

A Revised Tentative Map has been submitted with changes to the previously approved project. A 15183 Checklist has been prepared to provide additional analysis to address the changes in the project since the 2019 approval ("Modified Project") and to determine if any additional environmental impacts would occur from these changes beyond those analyzed in 2019 and in the County GPU EIR. The 15183 Checklist prepared for the Modified Project is included as **Appendix A** to this Environmental Checklist Form. The 15183 Checklist focuses only on the changes to the previously approved project. The previously approved project 15183 Checklist is included as **Appendix B** to this Environmental Checklist Form. Additional background information on the previous project approval, 15183 exemption process, GPU EIR, summary of findings, and analysis of potential environmental impacts resulting from the project are provided in the attached 15183 Checklist.

Additional technical analysis has been conducted for the Modified Project to provide evidence that the changes to the previously approved project do not result in new or more severe impacts (i.e., peculiar impacts) than disclosed in the 2019 15183 Checklist or the GPU EIR. To evaluate potential impacts related to Crotch's bumble bee that were not previously analyzed for the

previously approved project, an Addendum to the 2019 Biological Resources Technical Report for the Ocean Breeze Ranch Project (HELIX Environmental Planning [HELIX] 2019) has been prepared to evaluate the Modified Project (HELIX 2024) and is included as **Appendix C** to this Environmental Checklist Form.

Purpose of Initial Study – Environmental Checklist Form

The enclosed CEQA Initial Study – Environmental Checklist Form (Initial Study) has been prepared to evaluate new site- or project-specific significant impacts identified for the Modified Project that are not identified in the GPU EIR and determine if these new significant impacts can be mitigated to a less-than-significant level. Pursuant to Section 15063 of the California Environmental Quality Act (CEQA) Guidelines (Title 14, California Code of Regulations, Sections 15000 et seq.), an Initial Study is a preliminary environmental analysis that is used by the lead agency as a basis for determining whether an EIR, a Mitigated Negative Declaration (MND), or a Negative Declaration is required for a project. A focused EIR or MND is prepared to address new site- or project-specific significant impacts, and a Section 15183 Checklist is prepared to address all other impacts that were encompassed by the GPU EIR, with all pertinent mitigation measures and CEQA findings from the GPU EIR also applied to the proposed project.

Based on the findings of the 15183 Checklist, the Modified Project would not result in any new or more severe significant impacts (i.e., peculiar impacts) than identified in the previously approved project or the GPU EIR, with the exception of potential impacts to Crotch's bumble bee (*Bombus crotchii*), a candidate species under the California Endangered Species Act (CESA), that were not previously analyzed in the 15183 Checklist or described in the GPU EIR. Accordingly, this Initial Study evaluates potential impacts in CEQA Checklist Section IV, *Biological Resources*, Item (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 U.S. Fish and Wildlife Service; and Item (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. CEQA Checklist Section XXI, *Mandatory Findings of Significance*, is evaluated relative to whether the project would (a) 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; or (b) have impacts that are individually limited, but cumulatively considerable. All other environmental issue areas were adequately evaluated in the 15183 Checklist included as Appendix A to this Initial Study and are not further discussed herein.

PROJECT INFORMATION

1. **Project Name; Project Number(s); Environmental Log Number:**

Ocean Breeze Ranch Modified Project
PDS2023-TM-5615TER, PDS2024-MUP-16-012W1, PDS2024-STP-16-032W1 and
PDS2024-ER-16-02-006B

2. **Lead agency name and address:**

County of San Diego, Planning & Development Services
5510 Overland Avenue, Second Floor
San Diego, CA 92123

- a. Contact: Greg Mattson, AICP, Contract Planner
- b. Phone number: (619) 895-7177
- c. E-mail: gmattson@sdcounty.ca.gov

3. Project location:

The Ocean Breeze Ranch Modified Project (Modified Project) is located at 5820 West Lilac Road, in the Bonsall and Fallbrook Community Plan areas within unincorporated northern San Diego County. The Modified Project site spans across 1,402.52 acres and is located just south of State Route (SR-) 76 and the San Luis Rey River. Interstate (I-) 15 is located approximately 0.3 mile east of the Modified Project site. Primary access to the site is provided by West Lilac Road. Figure 1 shows the regional location, Figure 2 shows the project location on an aerial photograph, and Figure 3 shows the project location on a USGS map. The site is depicted within Sections 13, 14, 15, 20, 21, 22, and 23 of Township 10 South, Range 3 West of the *Bonsall, California* U.S. Geological Survey (USGS) 7.5-minute topographic quadrangle map.

4. Project Applicant name and address:

Ocean Breeze Ranch LLC
1550 South Coast Highway, Suite 201
Laguna Beach, CA 92651

5. General Plan

Community Plan:	Bonsall Community Plan
Regional Categories:	Village, Semi-Rural, Rural, No Jurisdiction
Land Use Designations:	Village Residential (VR-4.3), Semi-Rural Residential (SR-4), Semi-Rural Residential (SR-10), Rural Lands (RL-20), and Rural Lands (RL-40)
Density:	VR-4.3, SR-4, SR-10, RL-20, RL-40
Floor Area Ratio (FAR):	N/A

6. Zoning

Use Regulation:	Variable Family Residential (RV), Limited Agriculture (A70), and Open Space (S80)
Minimum Lot Size:	1 du per 6,000 Square Feet, 1 du per 2 Acres, 1 du per 4 Acres, 1 du per 8 acres
Special Area Regulation:	Community Design Review (B), Flood Plain (F), Airport (C)

7. Description of project:

Previous Project Approval:

In December 2019, the County of San Diego Planning Commission approved the Ocean Breeze Ranch project (previously approved project). The previously approved project included two components – a planned residential development and a private equestrian facility on a 1,402.52-acre site. The planned residential development included 396 residential lots divided into three planning areas (PA1, PA2, and PA3). The planned residential development also included parks, roads, and landscaped areas. The existing equestrian facility consisting primarily of previously constructed buildings and structures

would remain active within the site. However, no improvements were proposed to the equestrian facility. A 15183 Checklist Pursuant to CEQA Guidelines Section 15183 was prepared for the previously approved project and is included as an appendix to this document.

Description of Project:

The Modified Project is a Revised Map Time Extension for the previously approved project (Tentative Map 5615). The applicant (Ocean Breeze Ranch, LLC) requests a time extension and revisions to the previously approved project's grading design in order to avoid extensive import or export of soil in addition to other changes. Figure 4 depicts the site plan for the Modified Project.

The Modified Project includes revisions to the previously approved project, which include changes to 86 lot lines (i.e., 57 residential lots, 25 open space lots, 2 public park lots, and 2 private park lots); lowered building pad elevations in PA1 and PA3 and raised building pad elevations in PA2; revised utility alignments; an additional lot line to split the 100-acre subarea off of the 308.9-acre eastern hills excess biological open space; realigning Street B and associated surface improvements and utilities; adding drainage basins; revising West Lilac Road to provide a dual left turn lane and eastbound bike lane; an additional borrow site in PA3; construction of an equestrian Major Use Permit (MUP) emergency fire access per PDS2016-MUP-16-012; and addition of off-site traffic mitigation.

Under the Modified Project, the applicant is proposing to increase the grading quantities from the previously approved project amount of 1,900,000 cubic yards to 2,500,000 cubic yards, resulting in an increase in both cut and fill quantity when compared to the previously approved project of 600,000 cubic yards. To address geotechnical criteria, additional fill is required within PA2. The additional fill would be generated by increasing cut quantities within PA1. Building pad elevations have been lowered in PA1 and raised in PA2. Pad elevations in PA 1 have been reduced across a range of dimensions, ranging from 2 feet as the smallest change to 6 feet as the largest change. Pad elevations in PA 2 have been increased by 0.5 to 1 foot. These changes in pad elevations generally retain the street and lot layout approved under the previously approved project, with modest shifts to street alignment and lot lines. The Modified Project also includes changes to the number of previously approved architectural floor plans; from 6 to 17 floor plans.

As with the previously approved project, Modified Project access to PA1 and PA2 would be provided off West Lilac Road (a public road) and access to PA3 would be provided off Dulin Road (a private road). The Modified Project will be serviced by the North County Fire Department and the Bonsall Unified School District. Potable water and sewer would be provided by the Rainbow Municipal Water District. PA3 and the as-built equestrian center would be served by on-site wastewater treatment systems.

Discretionary Actions:

The Modified Project would require revision to the Tentative Map and a Major Use Permit Modification.

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

Lands surrounding the Modified Project site primarily consist of open space and rural residential development. The San Luis Rey River is located to the north of the Modified Project site, with State Route 76 (SR-76) and rural residential development occurring north

of the river. Interstate 15 (I-15) and rural residential development are located to the east, and rural residential development to the south and west. In addition, a California Department of Transportation (Caltrans) mitigation site is located along the northern property boundary, extending to the San Luis Rey River. The area surrounding the Modified Project site consists of parcels that are zoned Rural Residential (RR), Limited Agriculture (A70), Specific Plan (S88), Open Space (S80), and Mobile home Residential (RMH4).

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

Permit Type/Action	Agency
Incidental Take Permit*	California Department of Fish and Wildlife
National Pollutant Discharge Elimination System (NPDES) Permit	Regional Water Quality Control Board
General Construction Storm Water Permit Compliance	Regional Water Quality Control Board
Waste Discharge Requirements Permit	Regional Water Quality Control Board
Water District Approval	Rainbow Municipal Water District
Sewer District Approval	Rainbow Municipal Water District
Fire District Approval	North County Fire Department

*Possible permit.

10. 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 on Tribal Cultural Resources, and to reduce the potential for delay and conflict in the environmental review process (see Public Resources Code Section 21083.3.2). Information is also available from the Native American Heritage Commission’s Sacred Lands File per Public Resources Code Section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code Section 21082.3(e) contains provisions specific to confidentiality.

Pursuant to AB 52 guidelines, tribal consultation was initiated for 30 days from November 15, 2024, to December 16, 2024. The County received four requests for consultation – Pala Band of Mission Indians, Pechanga Band of Indians, San Luis Rey Band of Mission Indians, and Rincon San Luiseno Band of Mission Indians. County staff has met with Pala, Pechanga, San Luis Rey, and Rincon tribal representatives to describe and discuss the impacts of conserving habitat for the Crotch’s bumble bee within an approved biological open space conservation area on the project site. At this time, only Pechanga has agreed to conclude their consultation with the remaining tribes are still undetermined.


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

- | | | |
|--|---|--|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Agriculture and Forest Resources | <input type="checkbox"/> Air Quality |
| <input checked="" type="checkbox"/> Biological Resources | <input type="checkbox"/> Cultural Resources | <input type="checkbox"/> Energy |
| <input type="checkbox"/> Geology & Soils | <input type="checkbox"/> Greenhouse Gas Emissions | <input type="checkbox"/> Hazards & Hazardous Materials |
| <input type="checkbox"/> Hydrology and Water Quality | <input type="checkbox"/> Land Use & Planning | <input type="checkbox"/> Mineral Resources |
| <input type="checkbox"/> Noise | <input type="checkbox"/> Population & Housing | <input type="checkbox"/> Public Services |
| <input type="checkbox"/> Recreation | <input type="checkbox"/> Transportation | <input type="checkbox"/> Tribal Cultural Resources |
| <input type="checkbox"/> Utilities and Service Systems | <input type="checkbox"/> Wildfire | <input checked="" type="checkbox"/> 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, Planning & Development Services finds that the proposed project **COULD NOT** have a significant effect on the environment, and a **NEGATIVE DECLARATION** will be prepared.
- On the basis of this Initial Study, Planning & Development Services finds that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A **MITIGATED NEGATIVE DECLARATION** will be prepared.
- On the basis of this Initial Study, Planning & Development Services finds that the proposed project **MAY** have a significant effect on the environment, and an **ENVIRONMENTAL IMPACT REPORT** is required.



January 2, 2025
Date

Greg Mattson
Printed Name

Contract Planner
Title

INSTRUCTIONS ON EVALUATION OF ENVIRONMENTAL IMPACTS

1. A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, Less Than Significant With Mitigation Incorporated, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.
4. “Less Than Significant With Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level.
5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
 - a) Earlier Analysis Used. Identify and state where they are available for review.
 - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) Mitigation Measures. For effects that are “Less Than Significant With Mitigation Incorporated,” describe the mitigation measures that were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
7. The explanation of each issue should identify:
 - a) The significance criteria or threshold, if any, used to evaluate each question; and
 - b) The mitigation measure identified, if any, to reduce the impact to less than significance

IV. BIOLOGICAL RESOURCES -- Would the project:

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

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

Discussion/Explanation:

Less Than Significant With Mitigation Incorporated: An Addendum to the 2019 Biological Resources Technical Report (BRTR) for the Ocean Breeze Ranch Project (previously approved project) was prepared for the Modified Project (Appendix C; HELIX 2024). The purpose of this addendum is to document the existing biological conditions within the project site relative to Crotch's bumble bee (*Bombus crotchii*), a candidate species under the CESA, and to provide an analysis of potential impacts to this species with respect to local, state, and federal policy, as applicable. At the time of the project's original processing for project approval, Crotch's bumble bee was not listed as a candidate species under CESA. Therefore, impacts to Crotch's bumble bee were not analyzed for the previously approved project. The Addendum and the analysis herein focus solely on Crotch's bumble bee. All other biological resources analyses and documentation required under CEQA for the project were previously conducted and approved by the County's Planning Commission in December 2019, with minor modifications to the previously approved project being addressed in an updated CEQA 15183 Checklist for the Modified Project.

Crotch's bumble bee ranges across much of California and inhabits open grasslands and scrub habitats with suitable nectar and pollen sources. In southern California, it is most commonly observed on flowering species in the *Asclepias*, *Astragalus*, *Chaenactis*, *Eschscholzia*, *Lupinus*, *Phacelia*, and *Salvia* genera. A habitat assessment for Crotch's bumble bee was conducted on May 30, 2024 to determine the extent and suitability of potential habitat within the Modified Project site. A total of three surveys were conducted on June 20 and 21, July 15 and 16, and August 1 and 2, 2024, within an approximately 305.2-acre area of potential Crotch's bumble bee habitat in the southwestern portion of the Modified Project site. Details of the habitat assessment and survey dates, times, and conditions are provided in Table 1 and Section 1.3.2 of the Addendum in Appendix C to this Initial Study.

Survey results were positive for Crotch's bumble bee (Figure 5, *Crotch's Bumble Bee Survey Results*). A total of 29 individuals were observed in 18 locations during the survey effort, with 12 individuals detected during Survey 1, 15 individuals during Survey 2, and two individuals during Survey 3. Male Crotch's bumble bees were seen during all three surveys, and females were observed during the first and second surveys. No Crotch's bumble bee nests were observed, although the identification of male bees during all three surveys indicates the likely presence of a breeding Crotch's bumble bee population on site. The species was observed in Diegan coastal sage scrub and non-native grassland habitats foraging on a variety of flowering nectar sources, including narrow leaf milkweed (*Asclepias fascicularis*), California buckwheat (*Eriogonum fasciculatum*), white sage (*Salvia apiana*), and horehound (*Marrubium vulgare*). Individuals were also observed on non-flowering individuals of deerweed (*Acmispon glaber*), tocalote (*Centaurea melitensis*), and California everlasting (*Pseudognaphalium californicum*). Additional survey details are provided in Table 2 and Section 1.4.2 of the Addendum in Appendix C to this Initial Study.

Direct Impacts

The Modified Project would impact 71.4 acres of habitat considered occupied by Crotch’s bumble bee, composed of 32.8 acres of Diegan coastal sage scrub, 1.4 acres of flat-topped buckwheat scrub, and 37.2 acres of non-native grassland (Table 1, *Impacts to Crotch’s Bumble Bee Habitat*; Figure 6a, *Crotch’s Bumble Bee Survey Results and Project Impacts*, and Figure 6b, *Crotch’s Bumble Bee Survey Results and Project Impacts – Detail*). Impacts to Crotch’s bumble bee habitat would occur in association with construction of PA1 and associated roadways, including proposed entrance roads from West Lilac Road onto the site. These impacts would be considered significant.

Table 1
IMPACTS TO CROTCH’S BUMBLE BEE HABITAT

Vegetation Community¹	Existing On-Site²	Project Impacts²
Diegan Coastal Sage Scrub – including disturbed (32500)	509.2	32.8
Flat-topped Buckwheat Scrub (32800)	1.4	1.4
Non-Native Grassland (42200)	104.2	37.2
Total	614.8	71.4

¹ Vegetation categories and numerical codes are from Holland (1986) and Oberbauer (2008).

² Rounded to the nearest 0.1 acre; thus, total reflects rounding.

A total of six locations where individual bees were observed would be impacted, and 12 locations would be avoided, including 11 locations to be conserved within biological open space (Figure 7, *Biological Open Space, Vegetation, and Crotch’s Bumble Bee Locations*). The other avoided location is within grassland that will remain as is within the existing equestrian facility.

Indirect Impacts

Potential indirect impacts to Crotch’s bumble bee may occur as a result of implementation of the Modified Project. These include unauthorized human access into conserved lands, spread of invasive plant species, unauthorized habitat impacts during construction, increased fire risk, and use of herbicides or pesticides.

Unauthorized Human Access Into Conserved Lands

Increases in human activity in the area could result in degradation of open space habitat and associated indirect impacts on Crotch’s bumble bee through the creation of unauthorized trails and removal of vegetation that could be used by foraging bees. Potentially significant indirect impacts to Crotch’s bumble bee resulting from human access would be avoided through the following project design features: (1) permanent fencing shall be installed around biological open space where it abuts existing or proposed development, as well as in locations where human intrusion would not be precluded by physical factors such as steep topography or dense vegetation; (2) signs prohibiting access shall be posted along the perimeters of biological open space, including along areas where fencing is not installed; and (3) only non-invasive plant species would be included in the landscape plan for the site (species not listed on the California Invasive Plant Inventory prepared by the California Invasive Plant Council [Cal-IPC; 2006]).

Spread of Invasive Plant Species

Non-native plants could colonize areas disturbed by construction and development and could potentially spread into adjacent native habitats. Many non-native plants are highly invasive and can displace native vegetation (reducing native species diversity), potentially increase flammability and fire frequency, change ground and surface water levels, and potentially adversely affect native wildlife dependent on native plant species. Potentially significant indirect impacts to Crotch's bumble bee resulting from non-native plant species would be avoided through the project design features described above.

Unauthorized Habitat Impacts During Construction

Errant construction impacts to sensitive vegetation communities outside the approved project impact footprint could result in a potentially significant impact to Crotch's bumble bee if suitable foraging habitat is affected. Potentially significant indirect impacts resulting from construction impacts outside of the approved project footprint would be addressed through the placement of temporary construction fencing at the edges of the approved impact limits prior to the initiation of grading. Further, all construction staging shall occur within the approved limits of construction.

Increased Fire Risk

Project development could increase the risk of human-induced fires that could affect native habitats and the species dependent upon them, including Crotch's bumble bee. Potentially significant indirect impacts resulting from the increased risk of human-caused fires would be addressed through the incorporation of required fuel management zones and implementation of a limited building zone extending 100 feet outward from the biological open space which would provide a buffer between project development and biological open space. The construction of facilities requiring fire clearing is prohibited within the limited building zone.

Use of Herbicides or Pesticides

Use of herbicides or pesticides by homeowners or the Homeowners Association (HOA) in lands adjacent to the biological open space could have a detrimental effect on Crotch's bumble bee through reducing foraging resources, reducing reproductive capabilities, or direct mortality. Potentially significant indirect impacts resulting from the use of herbicides or pesticides by homeowners are generally not expected to occur, as all residential lots in PA1 and all but seven residential lots in PA2 are set back at least 100 feet from biological open space. The rear portions of 10 of the large lots in PA3 abut the biological open space, but most do not abut habitat with high potential for Crotch's bumble bee. The potential for impacts to Crotch's bumble bee from herbicide and pesticide use in HOA-maintained landscaped areas that abut biological open space would be reduced to a level below significance through Resource Manager outreach encouraging best management practices in the application of herbicides and pesticides to protect native insect pollinators, including (a) applying herbicide as locally and directly as possible (cut-stem application, hand applications, spraying directly onto the target plant), (b) applying pesticide with minimal applications, targeted to address the species of concern, and in compliance with all federal and state laws, (c) applying herbicides and pesticides at times when insect pollinators are less active (e.g., after sunset or during cold temperatures), (d) applying herbicide and pesticide during times when potential nectar sources are absent, and (e) applying herbicide and pesticide at times when insect pollinators are not observed in the area.

In addition, long-term management would be implemented for the Modified Project's biological open space. Management activities would be conducted by a qualified Resource Manager pursuant to a County- and Wildlife Agency-approved Resource Management Plan. The Resource Manager would conduct regular site visits and address management issues as needed, including, but not limited to fence repair, sign replacement, trash removal, and homeowner education, including education focused on best management practices for herbicide and pesticide use adjacent to biological open space.

With implementation of the project design features described above and management activities described in the Resource Management Plan, no significant impact to Crotch's bumble bee resulting from indirect impacts from human access, non-native plant species, errant construction impacts, increases in fire risk, or use of pesticides would occur over the long term.

Cumulative Impacts

As discussed in the 2019 Biological Resources Technical Report for the Ocean Breeze Ranch Project (HELIX 2019), the area of consideration for cumulative impacts on biological resources was based on an approximate 3.0-mile radius from the project site, extending to five miles from the site in a northeasterly direction. This study area includes surrounding open space connections to the project site, as well as foothills and canyons abutting the San Luis Rey River, and important named creek connections to the river in the project vicinity (i.e., Gopher Canyon Creek, Moosa Creek, Couser Creek, and Keys Creek). The cumulative study area was chosen because it includes areas with similar biological resources as the project site, as well as capturing the local watershed for the site. The area of consideration includes lands within a reasonable distance from the project site that may have a biologically based connection to the site in terms of habitat connectivity and development in the region.

A total of 43 projects (including the Modified Project) were reviewed for the cumulative analysis, of which 20 would result in significant or potentially significant cumulative impacts to sensitive biological resources. The remaining 23 projects either would not result in impacts to sensitive biological resources or information on impacts is not available. The Modified Project has the potential to contribute to the cumulative impact on Crotch's bumble bee, as discussed below.

The cumulative projects with available data would impact 220.0 acres of coastal sage scrub habitat and 398.7 acres of non-native grassland habitat, including impacts from the Modified Project. The Modified Project would result in impacts to 34.2 acres of combined coastal sage scrub/coastal sage transition (includes 32.8 acres of Diegan coastal sage scrub and 1.4 acres of flat-topped buckwheat scrub) and 37.2 acres of non-native grassland, for a total of 71.4 acres of impact to Crotch's bumble bee habitat. The Modified Project would contribute to the significant cumulative impact on Crotch's bumble bee since it would further reduce the amount of suitable foraging and nesting habitat available for this species.

Projects are required to compensate impacts on coastal sage scrub at a minimum 1:1 ratio. The Modified Project would compensate the loss of coastal sage scrub habitat at a 3:1 ratio through on-site preservation, per the mitigation measures for impacts to habitat occupied by coastal California gnatcatcher (*Polioptila californica californica*; [HELIX 2019 and 2024]). The 3:1 mitigation would total 102.6 acres of sage scrub. Additionally, in accordance with County guidelines and required mitigation ratios, the Modified Project would mitigate for impacts to non-native grassland at a 0.5:1 ratio, totaling 18.6 acres, through on-site preservation of habitat within biological open space (HELIX 2019 and 2024). Taken together, the Modified Project's required mitigation for impacts to coastal sage scrub and non-native grassland totals 121.2 acres, which

exceeds the minimum 1:1 ratio of habitat preservation for Crotch's bumble bee (71.4 acres). Additional on-site preservation of these habitats would occur above and beyond these minimum requirements, including an additional 43.8 acres of sage scrub and 25.7 acres of non-native grassland conserved within biological open space in occupied bee habitat in the southwestern portion of the site, and an additional 320.9 acres of sage scrub and 16.9 acres of non-native grassland within other portions of the biological open space. Further, other native scrub habitats with high potential to support this species would also be conserved, consisting of 31.5 acres of coastal sage-chaparral scrub and 31.8 acres of southern mixed chaparral.

Significance Conclusion and Mitigation Measures

Direct and cumulative impacts to Crotch's bumble bee would be mitigated through implementation of two species-specific mitigation measures, **MM-CBB-BIO#1** and **MM-CBB-BIO#2**, in addition to implementation of four previously approved general mitigation measures: **BIO-8a**, **BIO-8b**, **BIO-10a**, and **BIO-10b** (HELIX 2019). Implementation of species-specific mitigation measures, **MM-CBB-BIO#1** and **MM-CBB-BIO#2** would reduce direct impacts to less than significant. The Modified Project's contribution to the cumulative impact on Crotch's bumble bee habitat would be less than considerable and reduced to a less than significant level.

Species-Specific Measures (new mitigation measures in italics)

MM-CBB-BIO#1 *Mitigation for impacts to 71.4 acres of Crotch's bumble bee habitat (34.2 acres of combined coastal sage scrub/flat-topped buckwheat scrub and 37.2 acres of non-native grassland) shall occur at a minimum 1:1 ratio through on-site preservation of 71.4 acres of Diegan coastal sage scrub within a biological open space easement. The mitigation land will be located in the southwestern portion of the project site. The mitigation land for Crotch's bumble bee is contained within a much larger block of habitat to be conserved as biological open space for the project, totaling 832.2 acres, and overlaps with on-site preservation of coastal sage scrub for coastal California gnatcatcher. The mitigation shall be provided prior to the issuance of a grading permit. If Crotch's bumble bee is delisted, this measure shall not be required.*

MM-CBB-BIO#2 *Before the start of construction, required consultation with CDFW regarding the project's effects on Crotch's bumble bee must occur. If take of Crotch's bumble bee is expected, an incidental take permit issued by the CDFW must be obtained, as applicable. If CDFW issues an incidental take permit for Crotch's bumble bee, that document shall supersede any inconsistent measures and mitigation ratios provided for the species in the biological resources technical report addendum, CEQA document, or County Conditions of Approval. CESA compliance shall only be required if Crotch's bumble bee remains as a CESA candidate species or is listed under CESA at the time of project construction. If Crotch's bumble bee is delisted, this measure shall not be required.*

Previously Approved Applicable Project Measures

While not required as species-specific mitigation for Crotch's bumble bee, the following four mitigation measures already required for the overall project will assist in reducing the potential for indirect impacts to this species to a level below significance.

MM-BIO-8a The project requires preparation of a Resource Management Plan (RMP) for on-site biological open space to be approved by the County and Wildlife Agencies. The RMP will provide direction for the permanent preservation and management of the on-site biological open space in accordance with County regulations.

MM-BIO-8b The project will incorporate a 100-foot-wide limited building zone easement extending outward from the edge of the biological open space easement.

MM-BIO-10a To help ensure that errant impacts to sensitive vegetation communities outside of the impact footprint are avoided during construction, environmental fencing (including silt fencing where determined necessary by the Stormwater Pollution Prevention Plan), would be installed at the edges of the impact limits prior to initiation of grading. All construction staging shall occur within the approved limits of construction.

MM-BIO-10b A qualified biologist will monitor the installation of environmental fencing wherever it would abut sensitive vegetation communities, jurisdictional waters or wetlands, or biological open space. The biologist also will conduct a preconstruction environmental training session for construction personnel to inform them of the sensitive biological resources on site and avoidance measures to remain in compliance with project approvals. The biologist also will monitor vegetation clearing, grubbing, and grading activities on a regular basis to help ensure compliance with project approvals.

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

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

Discussion/Explanation:

Less than Significant: The Biological Resources Technical Report (HELIX 2019) prepared for the previously approved project determined that no significant impacts would occur under any of the County's guidelines for Wildlife Movement and Nursery Sites (refer to the County Guidelines for Determining Significance and Report Format and Content Requirements – Biological Resources; County 2010). The presence of Crotch's bumble bee on site does not change the previous conclusions and the Modified Project would not result in significant impacts to Crotch's bumble bee under any of these guidelines.

Sufficient habitat to support Crotch's bumble bee would be conserved in on-site biological open space. The proposed biological open space totals 832.2 acres and extends uninterrupted across the site for approximately 2.5 miles, with an additional 0.5 mile interrupted only by two access roads into the site, one of which currently exists. As such, the Modified Project would not substantially interfere with connectivity between blocks of habitat used by Crotch's bumble bee, or with potential to be used by this species.

The biological open space contains large expanses of native scrub habitats in addition to other habitats (Figure 7). A total of 172.1 acres of occupied Crotch's bumble bee habitat, composed of

146.4 acres of Diegan coastal sage scrub and 25.7 acres of non-native grassland would be conserved in the southwestern portion of the site, and an additional 401.0 acres of suitable habitat would be conserved in the remainder of the biological open space (Figure 8, *Biological Open Space and Crotch's Bumble Bee Habitat*), consisting of 320.9 acres of Diegan coastal sage scrub, 16.9 acres of non-native grassland, 31.5 acres of coastal sage-chaparral scrub, and 31.8 acres of southern mixed chaparral. Preservation of these habitats will continue to provide foraging and breeding habitat for a variety of species, including Crotch's bumble bee. Impacts would be less than significant.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE:

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

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

Discussion/Explanation:

Less Than Significant With Mitigation Incorporated: Per the instructions for evaluating environmental impacts in this Initial Study, the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal were considered in the response to each question in Sections IV of this form. In addition to project-specific impacts, this evaluation considered the Modified Project's potential for significant cumulative effects. The Modified Project would result in significant direct impacts to Crotch's bumble bee habitat; however, mitigation has been included that clearly reduces these effects to a level below significance. This mitigation includes species-specific mitigation measures **MM-CBB-BIO#1** and **MM-CBB-BIO#2**, plus previously approved mitigation measures **MM-BIO-8a**, **MM-BIO-8b**, **MM-BIO-10a**, and **MM-BIO-10a** to reduce potential impacts on sensitive species and habitats. As a result of this evaluation, there is no substantial evidence that, after mitigation, significant effects associated with the Modified Project would result. Therefore, the Modified Project has been determined not to meet this Mandatory Finding of Significance.

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

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

Discussion/Explanation:

Less Than Significant Impact: The potential for adverse cumulative effects was considered in the response to each question in Section IV of this form. In addition to project-specific impacts, this evaluation considered the Modified Project's potential for incremental effects that are cumulatively considerable. As a result of this evaluation, there is no substantial evidence that there are cumulative effects associated with the Modified Project. Therefore, the Modified Project has been determined not to meet this Mandatory Finding of Significance.

III. 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.

County of San Diego. 2010. Guidelines for Determining Significance and Report Format and Content Requirements, Biological Resources. Fourth Revision, September 15.

HELIX Environmental Planning, Inc. 2019. Biological Resources Technical Report for the Ocean Breeze Ranch Project. August 7.

2024. Ocean Breeze Ranch Project Addendum to the Biological Resources Technical Report. October 16.

LIST OF APPENDICES

Appendix A – Updated 15183 Checklist

Appendix B – 2019 15183 Checklist

Appendix C – Ocean Breeze Ranch Project Addendum to the Biological Resources Technical Report