Chapter 4.0

ENVIRONMENTAL EFFECTS FOUND NOT TO BE SIGNIFICANT

SUBCHAPTER 4.1

EFFECTS FOUND NOT TO BE SIGNIFICANT AS PART OF THE EIR PROCESS

CHAPTER 4.0 – ENVIRONMENTAL EFFECTS FOUND NOT TO BE SIGNIFICANT

Subchapter 4.1 discusses resource and service issues for which Project effects would not reach a level of significance, due to a low level of potential impact resulting from lack of sensitive resources, incorporation of attenuating Project design elements, or required compliance with regulatory standards. The chapter contains discussions related to mineral resources, hydrology and water quality, hazards and hazardous materials, population and housing, agricultural resources and Land Use and Planning. Subchapter 4.2 summarizes environmental issues found to be less than significant during preparation of the Project Initial Study (IS), circulated with the Project Notice of Preparation (NOP) of this EIR (see Appendix A for full text of the NOP and the Initial Study).

4.1 Effects Found Not to be Significant as Part of the EIR Process

4.1.1 Mineral Resources

The topic of minerals was not addressed in either the 1981 or 1983 certified EIRs. The analysis that follows is new.

A Mineral Resource Technical Report was prepared for the Proposed Project by Leighton and Associates, Inc. (2009), with this study summarized below along with applicable information from Chapter 3.2, Geology/Paleontology. The complete Mineral Resource Technical Report is included as Appendix K of this EIR.

Existing Conditions

Topographic Setting

The Project site is located within the Peninsular Ranges Geomorphic Province, which exhibits primarily northwest-southeast trending structural features. Topography within the site is characterized by generally level alluvial areas associated with a broad canyon encompassing much of the southern portion of the property. This canyon extends off-site to the west and south (where it enters the San Luis Rey River Valley), while adjacent areas to the east and north encompass moderately to steeply sloping hills. On-site drainage is primarily to the south via the described canyon and the associated Horse Ranch Creek, with vegetation including native upland habitats in the northern area (e.g., oak woodland and Diegan coastal sage scrub), pasture land in the central portion of the site, and extensive wetlands (southern riparian forest) to the south.

Geologic Setting

On-site geologic materials include Holocene-age alluvium, older alluvium/terrace deposits (approximately 500,000 years or less in age), and Cretaceous-age igneous rocks of the San Marcos gabbro. Alluvial deposits occur extensively in the southern portion of the site, with minor exposures also present in larger drainages located in the central and northern areas. Older alluvium/terrace deposits are present in much of the central portion of the site, as well as smaller areas to the north and along the southwestern site boundary. Gabbroic rocks are exposed along steeper slopes in the northern and northeastern site areas, and likely underlie other portions of the site. Additional discussion of topographic and geologic conditions in the Project site and vicinity is provided in Chapter 3.2, Geology/Paleontology, as well in Appendices F and K.

Mineral Resource Potential

As mandated by the Surface Mining and Reclamation Act of 1975 (SMARA), the California State Mining and Geology Board classifies aggregate mineral resources within the state through the Mineral Resource Zone (MRZ) system. The MRZ system identifies the presence or absence of substantial sand and gravel deposits and crushed rock source areas (i.e., commodities used as, or in the production of, construction materials). In western San Diego County, the MRZ classification emphasizes material used for the production of Portland cement concrete (PCC), which is subject to stricter specifications than other aggregate types. The following categories are provided in the mineral land classification for aggregate minerals in the western San Diego County Production-Consumption Region (CGS 1996, 1982).

- MRZ-1: Areas where adequate information indicates that no significant mineral deposits are present, or where it is judged that little likelihood exists for their presence.

- MRZ-2: Areas where adequate information indicates that significant mineral deposits are present, or where it is judged that a high likelihood exists for their presence.

- MRZ-3: Areas containing mineral deposits for which the significance cannot be determined from available data.

- MRZ-4: Areas where available information is inadequate for assignment of any other MRZ category.

On-site Mineral Resource Potential

Approximately 284 acres of the Project site have been mapped for MRZ classifications as described above, including much of the southern and central areas. The remaining (unmapped) portion of the site includes approximately 133 acres in the northeastern corner, with this area extending into the foothills of the adjacent Monserate Mountains (refer to Figure 2 of Appendix K). The following discussion of mineral resource potential within the Project site is based on the described MRZ classifications and on-site occurrences of Holocene alluvium, older alluvial/terrace deposits, and igneous rocks (refer to Figures 2 and 5 of Appendix K).

Holocene alluvial deposits encompass approximately 105 acres in the southern Project site, as well as minor areas within larger drainages in the central and northern portions of the property. These deposits are primarily within areas mapped as MRZ-3; however, alluvial portions of the geologic unit in this area are the same as the unit within the San Luis Rey River Valley, which has been mapped as MRZ-2. Accordingly, the Mineral Resource Technical Report for the Project identifies this area as MRZ-2. The majority of on-site alluvial deposits (i.e., approximately 90 acres in the southern portion of the site) encompassing native wetland habitats proposed to be preserved as biological open space.

Older alluvium/terrace deposits are located in the northern and central portions of the Project site, as well in the westernmost part of the southern area. These materials are differentiated from the younger alluvium primarily by a greater degree of consolidation (with the older deposits tending to be weakly cemented), and also tend to be more poorly sorted and contain interfingered deposits of silt, clay, and fine sand. Most areas on site containing older alluvium/terrace deposits are mapped as MRZ-3, due to the lack of associated test data, as well as their variable composition and the presence of fine-grained materials; however, as stated above, they are considered to be within MRZ-2. Portions of the on-site older

alluvium/terrace deposits are also within the 133-acre area not assigned an MRZ designation as previously described.

The northern portion of the Project site is underlain with gabbroic igneous rocks, with these deposits either mapped as MRZ-3 or located within the noted 133-acre area not assigned an MRZ designation. Gabbroic rocks also comprise the Monserate Mountains to the north and east of the site, as well as much of the San Marcos Mountains to the south. These units are fine-grained and generally covered with only a thin veneer of surfical deposits within the Project site (e.g., alluvium/colluvium and/or slopewash). Gabbroic rocks in the Project site vicinity are typically highly weathered and contain low amounts of silica (quartz), with no significant aggregate extraction operations known to have occurred locally in this unit. Unweathered gabbro in the San Marcos Mountains (approximately 8 to 10 miles southwest of the Project site) has been utilized for "Black Granite" dimension stone, although no similar current or historic uses for local gabbroic rock have been identified based on review of available literature (refer to Section 3.3.3 of Appendix K). On-site gabbro deposits are moderately to deeply weathered and decomposed, as evidenced by local terrain that is generally level to rolling and lacks larger boulder-sized outcrops. Geotechnical investigation conducted for the adjacent site to the east noted that similar gabbroic material is weathered to depths of 20 to 30 feet and contains a significant amount of fine-grained material (e.g., clay, silt, and fine sand, refer to Section 3.3.3 of Appendix K).

Off-site Mineral Resource Potential

Off-site areas to the west are mapped as MRZ-3, while most areas to the east are not assigned an MRZ designation (refer to Figure 2 in Appendix K). The MRZ-3 designations to the west encompass Holocene alluvium, older alluvium/terrace deposits and igneous granitic rocks, with associated mineral resource information generally similar to that described above for on-site deposits. As noted above, the San Luis Rey River corridor (along with some minor adjacent areas) located south of the Project site (as well as associated up- and downstream areas) is mapped as MRZ-2, with associated materials consisting of Quaternary-age river channel, floodplain and eroded terrace deposits (i.e., materials eroded from older bedrock units and redeposited in the river channel). Materials within the San Luis Rey River channel generally consist of loose (unconsolidated) mixtures of sand and rounded gravels. The MRZ-2 designation assigned to these deposits is based on an extensive production history for aggregate materials, with the greater San Luis Rey River Valley identified as a resource area containing an estimated 1.6 billion tons of sand and 1.2 billion tons of coarse aggregate (refer to Section 3.4.1 of Appendix K). A number of historic and current mining operations are located within the MRZ-2 designations in the Project site vicinity, as outlined below (refer also to Figure 6 in Appendix K).

The closest known historical aggregate operation was located within the San Luis Rey River channel just southeast and south of the Project site, on a property originally known as the Pankey Pits. Sand and gravel were extracted from this site by the Marron Brothers up until the early 1990s, when the operation was terminated due to environmental restrictions and associated difficulties in obtaining regulatory permits.

The Fenton Sand Mine was located approximately two miles upstream (east) of the Project site, with associated sand mining conducted on a maximum 211-acre site between 1969 and 2005. This property was operated through 2000 (when environmental restrictions limited the ability to mine/expand the site), with the site closed on September 15, 2005. The potential for continued operations at the Fenton Sand Mine is uncertain, based on environmental restrictions and associated permitting difficulties similar to those described above for the Pankey Pits site. The Fenton site also encompasses a 207-acre conservation easement established as part of the permitting conditions required for CWA Section 404 permit conformance.

The proposed Pankey Ranch/Rosemary's Mountain quarry is located just east of the Proposed Project and immediately north of the previously described Pankey Pits site (refer to Figure 6 in Appendix K). The Pankey Ranch/Rosemary's Mountain site includes approximately 94 acres and is associated with a Cretaceous-age igneous deposit composed of granodiorite. Based on a petition filed with the state in 1989, this site was reclassified from MRZ-3 to MRZ-2 (CGS 1989). Specifically, aggregate from the site met published Caltrans standards for PCC, asphaltic concrete, base and sub-base, with identified aggregate resources also exceeding the minimum value at that time of $9.2 million (in 1988 dollars) established for the MRZ-2 designation under SMARA. A Major Use Permit has been issued for the site, with proposed operations to include aggregate extraction, rock crushing, and an on-site asphalt plant (as well as widening of adjacent SR 76, refer to Section 3.4.1 of Appendix K).

Guidelines for the Determination of Significance

Guidelines of Significance

A significant impact to mineral resources would occur if:

1. The Proposed Project is:
    - On or within the vicinity (generally up to 1,300 feet from the site) of an area classified as MRZ-2; or
    - On land classified as MRZ-3; or
    - Underlain by Quaternary alluvium; or
    - On a known sand and gravel mine, quarry, or gemstone deposit; and
    - The project will result in the permanent loss of availability of a known mineral resource that would be of value to the region and the residents of the state; and
    - The deposit is minable, processable, and marketable under the technologic and economic conditions that exist at present or which can be estimated to exist in the next 50 years and meets or exceeds one or more of the following minimum values (in 1998 equivalent dollars):
        - Construction materials (sand and gravel, crushed rock) - $12,500,000;
        - Industrial and chemical mineral materials (limestone, dolomite, and marble [except where used as construction aggregate]; specialty sands, clays, phosphate, borates and gypsum, feldspar, talc, building stone and dimension stone) - $2,500,000; or
        - Metallic and rare minerals (precious metals [gold, silver, platinum], iron and other ferroalloy metals, copper, lead, zinc, uranium, rare earths, gemstones and semi-precious materials, and optical–grade calcite) - $1,250,000.
2. The project would 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.

Guideline Sources

The identified guidelines for significant mineral resource impacts are derived from the County Guidelines for Determining the Significance and Report Format and Content Requirements – Mineral Resources (July 30, 2008). The primary goal of these guidelines is to establish measurable standards for determining when an impact to mineral resources would be considered significant pursuant to CEQA. Specifically, the identified guidelines for mineral resources address associated questions from the State CEQA Guidelines, which encompass potential effects to statewide, regional or locally important mineral resource values (i.e., questions a and b in Section X of CEQA Guidelines Appendix G).

Analysis of Project Effects and Determination of Significance

Loss of Availability of a Known Mineral Resource (MRZ-2, MRZ-3, Quaternary Alluvium, or Known Mineral Deposit) that is Minable, Processable, and Marketable, and that Meets or Exceeds Applicable Minimum Dollar Values (Guideline No. 1).

The assessment of potential impacts under Guideline No. 1 involves the evaluation of effects to on-site mineral resources, as well as potential land use compatibility issues with off-site mineral operations and resources, as outlined below.

Impacts to On-site Mineral Resources

On-site mineral resources include a small (approximately 2-acre) area of Holocene alluvium designated as MRZ-2 near the southern site boundary, approximately 103 acres of Holocene alluvium in the southern portion of the site designated as MRZ-3 (but considered to be MRZ-2 in the Project Mineral Resource Technical Report), approximately 179 acres of older alluvium/terrace deposits and gabbroic rock designated as MRZ-3, and approximately 133 acres of older alluvium/terrace deposits and gabbroic rock that are not assigned an MRZ designation. The Project Mineral Resource Technical Report does not identify any significant impacts to on-site mineral resources, based on the following considerations:

- The approximately two-acre area of Holocene alluvium along the southern site boundary that is designated as MRZ-2 is not of sufficient size to meet the described minimum value for construction material, and is located beneath existing SR 76 (and is therefore unavailable for extraction or has already been lost).

- Of the approximately 103-acre area designated as MRZ-3 of Holocene alluvium in the southern portion of the site considered to be designated as MRZ-2 in the Mineral Resource Technical Report, approximately 97.2 acres are essentially lost because they are within 1,300 feet of existing residential properties. Per the County Guidelines for Determining Significance and Report Format and Content Requirements – Mineral Resources (July 30, 2008), 1,300 feet is the setback from sensitive receptors generally required to achieve acceptable noise levels associated with mining. In addition, it should be noted that the majority of the noted area (roughly 90 acres) supports sensitive wetland vegetation (i.e., southern riparian forest). The presence and environmental sensitivity of such habitats would result in either restrictions on disturbance (and the corresponding loss of minable area), or requirements for the acquisition of regulatory permits with associated mitigation and substantial expenditures (e.g., acquisition/preservation and/or creation of off-site habitat areas).

- The older alluvium/terrace deposits and gabbroic rock designated as MRZ-3 are not considered suitable for extraction, based on their content. Specifically, the older alluvium/terrace deposits have been evaluated on the adjacent property to the east, and were determined to contain “over 60

feet of medium-dense to dense reddish brown silty to clayey fine to coarse sand." Because of the fine-grained nature and weathered condition of this material, it is not considered a suitable candidate for extraction (refer to Section 4.2 of Appendix K). Similarly, the gabbroic rocks mapped as MRZ-3 within the site are moderately to highly weathered (with gabbro on the adjacent site to the east observed to be deeply fractured and weathered to depths of 20 to 30 feet), and lack significant amounts of siliceous materials. Accordingly, this unit is not considered a candidate for extraction (refer to Section 4.2 of Appendix K).

- The portions of the Project site that are not assigned an MRZ designation are underlain by similar older alluvium/terrace deposits and gabbroic rock as described above. Accordingly, these areas are not considered suitable candidates for extraction.

Based on the above considerations, the two areas available for mining equate to 7.8 acres (one 1.3-acre location and one 6.5-acre location). To evaluate the significance of the potentially recoverable materials within these areas assumed to be designated MRZ-2, a potential depth of recovery of 20 feet (due to probable groundwater constraints) is assumed. With these conditions, the approximate value of the material is eight million dollars, which is well below the County guideline. Accordingly, impacts to these areas would be **less than significant**.

Impacts to Off-site Mineral Resources

Potential impacts to off-site mineral resources are associated with land use conflicts between the Proposed Project and existing or future mineral resource operations. As noted in Significance Guideline No. 1, potentially significant land use conflicts related to off-site mineral resources are associated with projects located within 1,300 feet of areas classified as MRZ-2. For the Proposed Project, nearby MRZ-2 designations assessed in the following discussion include portions of the San Luis Rey River corridor and the proposed Pankey Ranch/Rosemary's Mountain quarry site.

San Luis Rey River Corridor. As previously described, much of the San Luis Rey River corridor (and some adjacent areas) in the vicinity of the Project site is designated as MRZ-2. While portions of these MRZ-2 zones are within 1,300 feet of the Project site, all of these areas are also within 1,300 feet of existing off-site residential properties (refer to Figure 7 in Appendix K). Accordingly, these areas are already unavailable for mineral extraction operations due to their proximity to residential uses, and would therefore not be adversely affected by implementation of the Proposed Project. Impacts would be **less than significant**.

Pankey Ranch/Rosemary's Mountain Quarry Site. Based on information from environmental analyses conducted for the proposed Rosemary's Mountain quarry operation, the Project Mineral Resource Technical Report identifies a number of specific conditions that "…made the Rosemary's Mountain site suitable as a quarry site." Specifically, these include "…location on the east-facing flank of Rosemary's Mountain, essentially shielding it from view and impacts to the Pala Mesa Resort and Interstate 15 corridor" (refer to Section 4.1.2 of Appendix K). Pursuant to these findings, the Project Mineral Resource Technical Report does not identify any significant land use compatibility impacts related to the Rosemary's Mountain quarry operation from implementation of the Proposed Project (refer to Section 4.2 of Appendix K). Impacts would be **less than significant**.

Loss of Availability of a Locally Important Mineral Resource Recovery Site (Guideline No. 2)

The Project site does not include any known designations of locally important mineral resources and is specifically not included in the Selected Resource Management Areas for Construction Quality Sand identified in Appendix F of the San Diego County General Plan Conservation Element. Based on these

conditions and the discussions related to mineral development potential provided above under Guideline No. 1, impacts related to the loss of a locally important mineral resource recovery site from implementation of the Proposed Project would be **less than significant**.

Cumulative Impact Analysis

As described above in this section, identified mineral resources within the Project site are either: (1) unavailable for extraction (i.e., approximately 2 acres of Holocene alluvium designated as MRZ-2 and located beneath existing SR 76); (2) lacking sufficient subsurface data to demonstrably meet established standards for construction material or warrant extraction (i.e., approximately 103 acres of Holocene alluvium designated as MRZ-3); or (3) unsuitable for extraction/use as construction material due to their weathered nature, lack of siliceous content, and/or fine-grained nature (i.e., approximately 284 acres of older alluvium/terrace deposits and gabbroic rock designated as MRZ-3, as well as 133 acres of similar material not assigned an MRZ designation). As a result, impacts related to the loss of availability of known or designated mineral resources would be **less than significant**.

The Project Mineral Resources Report also did not identify any significant impacts to off-site mineral resources or MRZ-2 designations from the Proposed Project, based on: (1) the location of such areas relative to existing off-site residential development (i.e., MRZ-2 areas within the San Luis Rey River corridor that are within 1,300 feet of the Project site are also within 1,300 feet of existing off-site residential uses, and are therefore already unavailable for extraction); and (2) the location/orientation of proposed operations at the Rosemary's Mountain quarry site (with these conditions concluded to essentially shield the quarry site from visual and other impacts relative to surrounding properties).

Based on the above described conditions, implementation the Proposed Project would not result in the loss of availability of known or designated mineral resources that would be of local, regional or statewide value. Accordingly, the Proposed Project would not constitute a considerable contribution to any cumulative impacts related to the loss of such mineral resources. **No cumulative impact** is identified.

Mitigation

Because no significant impacts were identified, mitigation is not proposed.

Conclusion

Based on the analysis provided above, no significant Project-specific or cumulative mineral resource impacts would result from implementation of the Proposed Project.

4.1.2 Hydrology and Water Quality

This section describes existing hydrologic and water quality conditions within the Project site and vicinity, identifies regulatory requirements and industry standards associated with hydrologic and water quality issues, and evaluates potential impacts and mitigation measures related to implementation of the Proposed Project.

The 1981 and 1983 EIRs identified flood control impacts as significant but mitigable and impacts to water quality as less than significant; the current Project identifies both issues to be less than significant.

The 1981 EIR notes that: (1) during construction, exposed ground surfaces potentially would lead to increased erosion and increased siltation in downstream areas; (2) approximately one-third of the site would be impervious post development, and (3) the project would contribute to an overall cumulative

effect of increased pollutants in runoff. Mitigation within the 1981 EIR included erosion control measures and runoff baffling devices to serve as mini-siltation basins.

Within the 1983 EIR, some buildings were noted as being located in the 100-year floodplain for the San Luis Rey River and/or Horse Ranch Creek. Portions of Pankey Road, Pala Mesa Drive and access roads within areas C and D also would be in the limits of the 100-year floodplain. Similar to the 1981 EIR, the 1983 EIR concluded that development of the project would create impervious surfaces that would result in increased runoff and peak flows in downstream watercourses—but due to the small nature of the increase, impacts were identified as less than significant. Mitigation for impacts associated with flooding would include elevating all building pads and roadways above the 100-year floodplain and no development within the floodway. As stated in the 1983 document, water quality would be impacted by runoff from primarily pesticides and fertilizers associated with agricultural use of the property, as well as petroleum products and detergents associated with urban land uses. The property also would be subject to erosion and increased sedimentation. Water quality impacts were not assessed as significant in the 1983 EIR.

As noted elsewhere in this document, the Proposed Project footprint has changed since the 1981 and 1983 documents were prepared. New area has been added, some of the prior project area has been severed pursuant to development by others, and the relationship between the Proposed Project footprint and Horse Ranch Creek has changed based on the changes just noted. In addition, since certification of these EIRs, the regulatory framework also has changed. The San Diego RWQCB Water Quality Control Plan for the San Diego Basin (1994) has been prepared. NPDES requirements for municipal, construction and groundwater effects are new since 1983. In addition, pursuant to the NPDES Municipal Permit requirements, the County now addresses storm water management under the Standard Urban Storm Water Mitigation Plan (SUSMP; most recently updated in March 2008). New ordinances are in effect as well as design practices.

These changed conditions have resulted in the need for new evaluation of these issues specific to the current Proposed Project, as discussed below. A Preliminary Hydrology and Hydraulics Study, a SWMP, and a Preliminary Hydromodification Management Plan (HMP) have been prepared for the Proposed Project (Landmark 2009a, 2009b and 2009c, respectively). These studies are summarized below along with other applicable data, with the complete reports included in Appendix L of this EIR.

Existing Conditions

Existing Setting

Watershed and Drainage Characteristics

The Project site is located within the San Luis Rey Hydrologic Unit (HU), one of 11 major drainage areas identified in the San Diego RWQCB *Water Quality Control Plan for the San Diego Basin* (Basin Plan, 1994 as amended). The San Luis Rey HU is a generally rectangular-shaped area that encompasses approximately 565 square miles and extends from near the San Diego/Riverside county line and Volcan Mountain along the eastern boundary of the San Diego Basin to the City of Oceanside on the coast (Figure 4.1.2-1). The San Luis Rey HU is divided into a number of hydrologic areas and subareas based on local drainage characteristics. The Project site is located within the Lower San Luis Hydrologic Area (HA), Bonsall Hydrologic Subarea (HSA), and Horse Ranch Creek watershed. Drainage within the San Luis Rey HU is predominantly through the San Luis Rey River and associated tributaries, with the river located approximately 800 feet south of the Project site at its closest point. The San Luis Rey River continues generally southwest from the site vicinity and enters the Pacific Ocean in the City of Oceanside approximately 16 miles southwest of the Project site.

Surface drainage from the entire Project site and associated off-site facility areas flows to the San Luis Rey River, with runoff directions locally variable with location and topography. Drainage within the northern 176 acres of the site flows primarily west-southwest through several unnamed canyons and as non-point runoff (sheet flow), before entering an existing drainage structure (i.e., a five- by eight-foot box culvert) beneath the northern extension of Pankey Road). Flow from this structure enters Horse Ranch Creek just west of the site (and east of I-15) and turns south. This portion of Horse Ranch Creek consists of an unlined trapezoidal channel constructed in association with the adjacent I-15 corridor. The described flows from the northern portion of the site (and unrelated flows from upstream watershed areas) continue south in the Horse Ranch Creek channel for approximately 3,600 feet, where the manufactured channel ends and Horse Ranch Creek opens up into a wide, shallow drainage basin. Runoff from the southern 241 acres of the site flows southwest primarily as sheet flow (along with minor flows in a few small drainages) and enters Horse Ranch Creek along or adjacent to the western site boundary. The flows from the northern and southern site areas confluence in Horse Ranch Creek and continue generally south in the noted drainage basin, before entering a more confined bridge crossing at the southern extension of Pankey Road. From this point, the combined flows enter a defined drainage channel, exit the southern end of the site, and flow under SR 76 to the San Luis River via a number of existing drainage facilities. Existing 100-year storm flow at the described outlet point at the southern end of the site (i.e., combined flow from the entire site and upstream watershed areas) is approximately 8,802 cubic feet per second (cfs, refer to Sections 5 and 11 of the Preliminary Hydrology and Hydraulics Study in Appendix L). Surface drainage from proposed off-site facility areas occurs as both sheet flow and within a number of existing storm drain facilities, and exhibits variable local flow directions before ultimately entering the San Luis Rey River. Average annual precipitation in the Project site vicinity (Fallbrook) is approximately 14 inches, with the highest average rainfall totals occurring in January (3.13 inches), February (2.66 inches), and March (2.83 inches). The driest months are June, July, and August, with average rainfall totals of 0.13, 0.05, and 0.11 inches, respectively (weather.com 2007).

The Project site is largely undeveloped, with known existing on-site drainage facilities limited to the previously noted box culvert beneath the northern extension of Pankey Road. Downstream drainage facilities include several crossing structures along the San Luis Rey River at roadways including Shearer Crossing, I-15, Old Highway 395, SR 76, and I-5.

Flood Hazards

The Federal Emergency Management Agency (FEMA) has mapped flood hazards in the Project site and vicinity. The entire Project site and off-site facility areas are designated as Zone X by FEMA, or areas determined to be outside the 500-year (and therefore the 100-year) floodplain (FEMA 1997a and 1997b). In addition to the described FEMA mapping, a pre-development 100-year floodplain has been mapped along Horse Ranch Creek as part of the Project Hydrologic Engineering Center-River Analysis System (HEC-RAS) study (refer to Section 9 of the Preliminary Hydrology and Hydraulics Study in Appendix L). The existing 100-year floodplain identified in this study along Horse Ranch Creek extends through much of the southernmost portion of the Project site and a number of adjacent properties. The Preliminary Hydrology and Hydraulics Study (Appendix L) also notes that 100-year storm flows derived from upstream portions of the watershed that incorporates the Project site exceed the capacity of the existing box culvert crossing of Horse Ranch Creek at the northern extension of Pankey Road. Accordingly, this roadway is currently subject to flooding during 100-year storm flow conditions. In addition, the Preliminary Hydrology and Hydraulics Study states that the northernmost bridge over Horse Ranch Creek along the southern extension of Pankey Road is also subject to flooding during 100-year storm flow conditions.

Groundwater

Shallow groundwater was observed in a number of locations during the Project geotechnical investigations, including areas near the San Luis Rey River, Horse Ranch Creek, and portions of the northern site area. Observed groundwater was present at depths ranging from between approximately 1.5 and 12 feet below surface grade in alluvium, and 28 to 56 feet below surface grade in terrace deposits. Shallow on-site aquifers were interpreted as perched groundwater, which consists generally of unconfined (i.e., not under pressure) groundwater separated from underlying permanent groundwater bodies by impermeable or semi-permeable strata. The occurrence and/or extent of perched groundwater bodies are typically associated with and influenced by seasonal precipitation and/or local landscape or agricultural irrigation.

Existing groundwater use on site is associated with a single well located in the southern portion of the northern area, with extracted water used for domestic consumption at an adjacent residence and for stock watering (refer to Section 4.1.4 of this Subchapter). This well extends to a depth of 150 feet and exhibits a static water level of 42 feet (GeoSoils, Inc. 2002), with no known data available regarding the amount (yield) or capacity of the associated aquifer(s). Three abandoned wells are also located in the southeastern (two well sites) and northern portions of the southern area, with an abandoned pump house associated with the northernmost well site (GeoSoils, Inc. 2002). Several additional off-site wells located near the San Luis Rey River were reportedly used for irrigation of previous agricultural operations in the site and vicinity. No documented depth or yield data are known to be available for any of the abandoned on-site wells, with the off-site wells near the San Luis Rey River reportedly exhibiting production rates of up to 1,000 gpm during historic use for agricultural irrigation (Pankey, pers. comm. 2005).

Water Quality

Surface water on site consists predominantly of intermittent flows from storm events and runoff from upstream agricultural (or other) irrigation. Known water quality data for the Project site and immediate vicinity are limited to two samples from the northeastern portion of the southern area. Both samples were taken from an outlet pipe originating off site in the adjacent mixed use (avocado/citrus) orchards. These samples were collected during the Phase I (hazardous materials) field investigation in 2002, and in a separate sampling effort conducted in February 2009 (GeoSoils, Inc., 2009 and 2002). The 2002 sample was tested for contaminants including agricultural chemical residue, total petroleum hydrocarbons (gas and diesel), pH, organic lead, and nitrates, while the 2009 sample was tested for nitrates only. The results of the 2002 test indicated that observed levels of organophosphorus pesticides, chlorinated pesticides/herbicides, petroleum hydrocarbons, and lead were all below detection limits, while observed pH was 6.7, or neutral (GeoSoils, Inc. 2002). The observed nitrate level from the 2002 sample was 43 mg/l, while the nitrate level from the 2009 sample was 9.5 mg/l. Both of these sample results are below the Basin Plan nitrate standard dentified in the referenced GeoSoils reports. The Maximum Contaminant Level relative to drinking water standards for nitrate is10 milligrams per liter (mg/l), with the outlet pipe not delivering potable water to any on- or off-site receivers.

No known surface water quality data beyond the above-described sample are available for the Project site and immediate vicinity. The type of storm and irrigation flows expected to occur on site are typically subject to variations in water quality due to local conditions such as runoff volume/velocity and land use. A summary of typical contaminant sources and levels for various land use types is provided in Tables 4.1.2-1 and 4.1.2-2. Based on the sample data, as well as the nature and generally low intensity of existing development within the Project site and upstream areas, local surface water quality is expected to be generally moderate to good. This anticipated condition is qualified somewhat by the presence of adjacent agricultural operations, which are considered the likely source of elevated nitrate levels observed in the on-site surface water sample.

No documented data on groundwater quality within the Project site and immediate vicinity are known to be available. The wells along the San Luis Rey River reportedly exhibited total dissolved solids (TDS) levels of approximately 400 to 500 mg/l during the 1960s. One of the described on-site wells located in the southeastern portion of the site (approximately 0.5 mile north of SR 76 and 100 feet west of the eastern Project site boundary) was reportedly drilled in the 1970s but never used for irrigation due to "high TDS levels" (Pankey, pers. comm. 2005).

The principal surface waters located downstream of the Project site include the San Luis Rey River and the Pacific Ocean. Existing water quality data for these areas include published and unpublished literature sources, quantitative monitoring/testing, and biological assessment (bioassessment) studies, as well as bi-annual qualitative evaluations conducted by the SWRCB. These sources include both historical and current efforts, as summarized below.

Historic and current water quality monitoring has been/is being conducted along the San Luis Rey River in association with local/regional water agency programs and requirements under the federal CWA, NPDES, and the associated Municipal Storm Water Permit as summarized below (refer to the following discussion of Regulatory Framework for additional information).

Monitoring at the San Luis Rey River Yuma site (located approximately 10 miles downstream of the Project site) was conducted between 1993 and 1998. Data obtained during these efforts indicate that applicable water quality objectives were regularly exceeded for fecal coliform counts, semi-volatile compounds, and total petroleum hydrocarbons; frequently exceeded for metals (including copper and zinc), nitrogen, and total suspended solids (TSS); and occasionally exceeded for biochemical oxygen demand (BOD) and chemical oxygen demand (MEC Analytical Systems, Inc. 2001). Monitoring at the San Luis Rey River mass loading station (MLS, located approximately 15 miles downstream of the Project site) is conducted under the NPDES Municipal Permit, with collected data indicating that applicable water quality objectives were exceeded for TDS in all testing events between 2001 and 2006. Water quality objectives for a number of additional constituents of concern were exceeded in various testing events during the noted time period, including toxicity, diazinon, pH, fecal coliform, TSS, turbidity, and BOD (WESTON Solutions, Inc. [WESTON] 2007).

Dry weather sampling is conducted under the NPDES Municipal Permit at a number of sites located both upstream and downstream of the Project site. The most recent data indicate that water quality objectives were exceeded in 2005 for turbidity, pH, nitrate, ammonia, fecal coliform, total coliform, enterococcus and ortho-phosphate (WESTON 2007).

The City of Oceanside conducted water quality monitoring between November 1993 and July 2001 at three locations along the San Luis Rey River. Data from these efforts identified issues with "[p]arameters that exhibited consistently high concentrations…" including bacterial indicators, TDS, chloride, magnesium, iron, and manganese (City of Oceanside 2003).

Ambient bay and lagoon monitoring was initiated as part of the NPDES Municipal Permit requirements in 2002/2003 for a number of coastal waters, including the San Luis Rey River Estuary. Samples obtained from the San Luis Rey River Estuary between 2002 and 2006 exhibited generally high individual and overall (i.e., relative to other sampled embayments) quality rankings for sediment chemistry and toxicity (although the data suggest that toxic constituents are present), and low to moderate rankings for benthic community structure (WESTON 2007).

Bioassessment studies were conducted as part of the described NPDES monitoring in 2001-2006, and as a separate program by the RWQCB between 1998 and 2002 (WESTON 2007; RWQCB 2002, 2001, and 1999). Test results for locations along the San Luis Rey River exhibited somewhat varied results during different years, with data from 1998 to 2000 generally at or above the mean for all applicable sites, and

data from 2001 to 2006 generally below the mean. Data from the more recent monitoring events likely reflect moderate to poor water quality conditions.

Available information on groundwater quality in downstream basins includes historic and/or recent data for the Mission and Bonsall HSA Basins, as well as the San Luis Rey River Valley Basin. The Bonsall Basin coincides with the Bonsall HSA boundary depicted on Figure 4.1.2-1, while the Mission HSA Basin includes areas further downstream within the San Luis Rey River HU. An evaluation of potential groundwater storage capabilities conducted for the SDCWA identified TDS ranges of 1,000 to 3,100 mg/l in the Mission HSA Basin and 600 to 3,100 mg/l for the Bonsall HSA Basin (Woodward-Clyde 1990). These levels represent generally moderate to poor water quality conditions, although local variation was present. More recent data for the Mission HSA Basin also indicate generally moderate to poor groundwater quality conditions, as characterized by typical TDS levels of 1,200 to 1,600 mg/l (SDCWA 1997). The described groundwater quality conditions are likely associated, at least in part, with extensive agricultural use in the associated watersheds.

Historic water quality in the southwestern portion of the San Luis Rey Valley Basin was described as exhibiting magnesium, sulfate, chloride, nitrate, iron, and TDS levels that were unsuitable for domestic use, as well as chloride and TDS levels unsuitable for irrigation (California Department of Water Resources [DWR] 2003). Recent assessment of groundwater quality conducted for the San Luis Rey Valley Basin identified a TDS range of 530 to 7,060 mg/l (with an average of 1,258 mg/l), and documented a number of incidents where water quality objectives (or maximum contaminant levels [MCLs]) were exceeded for contaminants including nitrates and pesticides (SWRCB 2003). The described recent and historic data indicate generally moderate to poor groundwater quality within the southwestern portion of the San Luis Rey Valley Basin, with these conditions associated with factors including urban/agricultural development and seawater intrusion in coastal areas.

The SWRCB produces bi-annual qualitative assessments of statewide and regional water quality conditions. The most current (2006) approved listing identifies 19 miles of the San Luis Rey River corridor (with the impairment located within the lower 13 miles) and 0.49 mile of shoreline at the San Luis Rey River mouth as the only impaired waters located downstream of the Project site. The noted section of shoreline is listed due to bacterial indicators, while the San Luis Rey River listing is based on TDS and chloride levels (SWRCB 2007).

Based on the above information, surface water quality within the Project site is assumed to be generally moderate. This conclusion is based on the described water quality data, as well as the fact that associated upstream watersheds include agricultural uses, but not substantial urban development. Monitoring data indicate generally moderate to poor water quality conditions in downstream portions of the San Luis Rey River and associated coastal waters, with this situation attributed largely to the higher level of urban development and associated contaminant generation. Based on the available historic and recent data described above, groundwater quality within the Project site and downstream portions of the Bonsall, Mission, and San Luis Rey Valley basins is characterized as generally moderate to poor.

Regulatory Framework

The Proposed Project is subject to a number of regulatory requirements associated with federal, state and local guidelines, as summarized below, with additional discussion provided below under the discussion of impacts, as appropriate.

<u>National Pollutant Discharge Elimination System Requirements</u>

The Proposed Project is subject to applicable elements of the CWA, including the NPDES. Specific NPDES requirements associated with the Proposed Project include conformance with the General Construction Activity Storm Water Permit (Construction Permit, NPDES No. CAS000002, SWRCB

Order 99-08-DWQ), General Groundwater Extraction Waste Discharge Permit (Groundwater Permit, NPDES No. CAG919002, RWQCB Order No. 2001-96), NPDES Municipal Storm Water Permit (Municipal Permit, NPDES CAS 0108758, RWQCB Order No. 2007-0001), and related County standards as outlined below.

General Construction Activity Storm Water Permit

Conformance with the Construction Permit is required prior to development of applicable sites exceeding one acre, with this permit issued by the SWRCB under an agreement with the USEPA. Specific conformance requirements include implementing a SWPPP and an associated monitoring program, as well as a Storm Water Sampling and Analysis Strategy (SWSAS) for applicable projects (i.e., those discharging directly into waters impaired due to sedimentation or involving potential discharge of non-visible contaminants that may exceed water quality objectives). These plans identify detailed measures to prevent and control the off-site discharge of contaminants in storm water runoff. Specific pollution control measures require the use of best available technology economically achievable (BAT) and/or best conventional pollutant control technology (BCT) levels of treatment, with these requirements implemented through best management practices (BMPs). While site-specific measures vary somewhat with conditions such as proposed grading, slope, and soil characteristics; detailed guidance for construction-related BMPs is provided in the Construction Permit text and County standards, as well as additional sources including the *Caltrans Storm Water Quality Handbooks* (Caltrans 2007, 2003), USEPA *National Menu of Best Management Practices for Storm Water Phase II* (USEPA 2007), and *Storm Water Best Management Practices Handbooks* (California Stormwater Quality Association 2003). The application of construction permit and SWPPP requirements to the Proposed Project is described below as appropriate in the discussion of potential impacts.

General Groundwater Extraction Waste Discharge Permit

Conformance with the noted Groundwater Permit is applicable to discharge activities that either involve more than 100,000 gpd of discharge, or include contaminants that would exceed applicable discharge requirements. Specifically, these requirements are intended to ensure compliance with applicable Basin Plan water quality and beneficial use objectives (as described below), and typically require BMPs involving a number of physical and/or chemical parameters such as erosion/sedimentation controls and testing/treatment of extracted groundwater prior to disposal.

Municipal Storm Water Permit

This permit was initially adopted by the RWQCB in 2001, with a revised permit adopted on January 24, 2007 (under Order No. 2007-0001). The current Municipal Permit identifies waste discharge requirements for urban runoff related to applicable new development, redevelopment and existing development sites under the jurisdiction of co-permittees (e.g., the County). The intent of these requirements is to protect environmentally sensitive areas and provide conformance with pertinent water quality standards, including the CWA and the RWQCB Basin Plan. Identified requirements involve using a number of planning, design, operation, treatment and enforcement measures to reduce pollutant discharges from individual development projects (and the municipal storm drain system as a whole) to the maximum extent practicable (MEP). Specifically, these measures include: (1) using jurisdictional planning efforts (such as discretionary general plan approvals) to provide water quality protection; (2) requiring coordination between individual jurisdictions to provide watershed-based water quality protection; (3) implementing applicable low impact development, site design, source control, priority project, and volume- or flow-based (as defined in the permit text) treatment control BMPs to avoid,

reduce and/or mitigate effects including increased erosion and sedimentation, hydromodification[1] and the discharge of contaminants in urban runoff; and (4) using appropriate monitoring, reporting and enforcement efforts to ensure proper implementation, documentation and (as appropriate) modification of permit requirements. The Municipal Permit also requires co-permittees to fund and implement urban runoff management plans (URMPs) to reduce runoff and contaminant discharges to the MEP. The URMPs were conducted on a jurisdictional basis for the first two years, and were expanded to include a watershed-based approach for subsequent efforts. The watershed-based approach has been implemented for the Project site and applicable downstream watersheds through the San Luis Rey River Watershed URMP (City of Oceanside 2003).

Pursuant to the described Municipal Permit requirements, the County (along with other applicable co-permittees) participated in developing the SUSMP (approved by the RWQCB on June 12, 2002) to address storm water quality issues, and adopted related storm water standards and ordinances as described below under County Requirements. The County adopted a local (County-specific) SUSMP on February 10, 2003 (per Municipal Permit requirements), with an update of this document adopted on March 24, 2008 to reflect the revised 2007 Municipal Permit. The application of Municipal Permit and related County requirements to the Proposed Project are described below as appropriate in the discussion of potential impacts.

Basin Plan Requirements

The RWQCB Basin Plan establishes a number of beneficial uses and water quality objectives for surface and groundwater resources. Beneficial uses are generally defined in the Basin Plan as "the uses of water necessary for the survival or well being of man, plus plants and wildlife." Identified existing and potential beneficial uses for the Project site and applicable downstream areas of the Mission and Bonsall HSAs (including coastal waters) include: agricultural supply (AGR); industrial service supply (IND); contact and non-contact water recreation (REC 1 and REC 2, respectively); warm and cold freshwater habitat (WARM and COLD, respectively); wildlife habitat (WILD); rare, threatened, or endangered species (RARE); marine habitat (MAR); and migration of aquatic organisms (MIGR). Identified beneficial uses for groundwater in the Lower San Luis HA include municipal and domestic supply (MUN), AGR and IND. Water quality objectives identified in the Basin Plan are based on established beneficial uses and are defined as "the limits or levels of water quality constituents or characteristics which are established for the reasonable protection of beneficial uses." Water quality objectives identified for surface and groundwater resources in the Lower San Luis HA and the Bonsall HSA are summarized in Table 4.1.2-3.

County of San Diego Requirements

Pursuant to the NPDES Municipal Permit requirements, the County has adopted the Watershed Protection, Stormwater Management, and Discharge Control Ordinance (Stormwater Ordinance, No. 9926), the associated Stormwater Standards Manual (Manual) and Low Impact Development (LID)[2] Handbook, and the previously described County SUSMP. These documents provide, among other things, direction for applicants to determine if and how they are subject to County and related Municipal Storm

[1] Hydromodification is defined in the Municipal Permit as the change in natural watershed hydrologic processes and runoff characteristics (infiltration and overland flow) caused by urbanization or other land use changes that result in increased stream flows, sediment transport, and morphological changes in the channels receiving the runoff.

[2] The LID process is intended to mimic predevelopment hydrologic conditions by using design practices and techniques to effectively capture, filter, store, evaporate, detain and infiltrate runoff close to its source.

Water Permit standards, and identify requirements for the inclusion of permanent site design, source control, low impact development, priority project and treatment control BMPs to provide regulatory conformance for applicable projects. The County Storm Water Ordinance/Manual also requires construction-related BMPs to address issues including erosion and sedimentation. The County may, at its discretion, require the submittal and approval of a SWPPP to address construction-related storm water issues prior to site development (with such requirements in addition to the NPDES SWPPP criteria described above). The application of County storm water requirements is described below as appropriate in the discussion of potential impacts.

The San Diego County Hydrology Manual (County 2003) provides uniform procedures for analyzing flood and storm water conditions in the County. Specific elements of these procedures include methods to estimate storm flow peaks, volumes, and time distributions. These data are used in the design of storm water management facilities to ensure appropriate dimensions and capacity (typically 100-year storm flow volumes), pursuant to applicable requirements in the San Diego County Design and Procedure Manual (County 1993).

The County Guidelines for Determining Significance – Hydrology (July 30, 2007) provide direction for evaluating environmental effects to and from hydrologic conditions and hazards. Specifically, these guidelines address potential adverse effects to hydrologic resources, life and property (pursuant to applicable CEQA standards) from issues including drainage alteration, increased water surface elevations, increased runoff velocities and peak flow rates, and flooding. The County Guidelines identify significance guidelines for the noted issues, as well as related regulatory standards, typical adverse effects, standard mitigation/design considerations, and reporting requirements.

Guidelines for the Determination of Significance

Guidelines of Significance

Project-related impacts associated with drainage and water quality impacts would be significant on a project and/or cumulative level if the proposed project would:

1. Increase water surface elevation in a watercourse within a watershed equal or greater than 1 square mile by 1 foot or more in height, and in the case of the San Luis Rey River, 0.2 foot or more in height.
2. Result in increased velocities and peak flow rates exiting the Project site, which would cause flooding downstream or exceed the stormwater drainage system capacity serving the site.
3. Result in placing housing or habitable structures in a 100-year floodplain area or other special flood hazard area, as shown on a Flood Insurance Rate Map (FIRM), a County Flood Plain Map or County Alluvial Fan Map, which would subsequently endanger health, safety and property due to water hazards.
4. Place structures within a 100-year flood hazard or alter the floodway in such a manner that would redirect or impede flow resulting in any of the following:
    a. Alter the Lines of Inundation resulting in the placement of other housing in a 100 year flood hazard; and/or
    b. Increase water surface elevation in a watercourse with a watershed equal to or greater than 1 square mile by 1 foot or more in height and, in the case of the San Luis Rey River, 0.2 foot or more in height.

5. Fail to conform to applicable federal, State or local "Clean Water" statutes or regulation including but not limited to the Federal Water Pollution Control Act; California Porter-Cologne Water Quality Control Act; and the County of San Diego Watershed Protection, Stormwater Management, and Discharge Control Ordinance.
6. Be tributary to an impaired water body, as listed on the CWA Section 303(d) list and the project would contribute additional pollutant(s) for which the receiving water body is already impaired.
7. Cause or contribute to an exceedance of applicable state or local surface or groundwater receiving water quality objectives or degradation of beneficial uses.
8. Cause or contribute to an exceedance of applicable federal or state drinking water standards for maximum contaminant levels.
9. Cause or contribute to an exceedance of the existing or planned stormwater drainage system capacity.

Guideline Sources

The identified significance guidelines are based on the referenced County Guidelines for Determining Significance – Hydrology (July 30, 2007) and County Guidelines for Determining Significance – Surface Water Quality (July 30, 2007). These guidelines are intended to ensure conformance with existing regulatory standards, as well as to protect public health/safety and private property from hydrology and water quality related hazards. The County Guidelines for Determining Significance – Surface Water Quality (July 30, 2007) provide direction for evaluating environmental effects related to water quality issues, pursuant to related CEQA standards. The Water Quality Guidelines give an overview of hydrologic resources, local watershed conditions, related regulatory standards and typical adverse effects, and provide guidance for identifying significance guidelines and standard mitigation/design considerations.

Analysis of Project Effects and Determination as to Significance

Potential Impacts Associated with Flooding and Storm Drain Capacity (Guidelines No. 1, 2, 3, 4, and 9)

The majority of proposed development within the Project site and off-site facility areas is not located within any mapped 100-year floodplain boundaries, with no associated potential impacts. Portions of existing Pankey Road (northern extension), however, as well as portions of PA MF-1 and PA MF-4, the previously described northernmost bridge along Pankey Road (southern extension), the sewer pump station, on-site roadways, off-site facility areas and one residential site are within the previously described existing 100-year floodplain mapped along Horse Ranch Creek as part of the Project HEC-RAS (refer to the Pre- and Post-development Conditions Hydrology Maps in Sections 9 and 11 of the Preliminary Hydrology and Hydraulics Study in Appendix L). In addition, the proposed development would constrict floodplain width in the southern portion of the site, raising the associated water surface elevation by approximately 4.4 feet and extending the 100-year floodplain boundary further to the west within the adjacent Campus Park West (TM 5424) property. The additional area within the Campus Park West property is currently vacant, and is not proposed for uses under TM 5424 that would be adversely affected by the described flooding (refer to Section 11 of the Preliminary Hydrology and Hydraulics Study in Appendix L).

The Proposed Project design includes a number of measures to address the location of existing and proposed facilities within mapped floodplain boundaries as described above, including: (1) applicable portions of all proposed residential lots, as well as on- and off-site roadway/utility corridors and other appropriate sites/facilities, would be elevated above 100-year storm flood water elevations through

proposed grading (i.e., by building up associated pads or roadbeds); (2) portions of the 100-year flow derived from upstream areas would be diverted around the existing box culvert at the Pankey Road (northern extension) crossing of Horse Ranch Creek, such that the existing culvert would accommodate the remaining flows and the noted section of Pankey Road would not flood during 100-year storm flows; (3) the existing northernmost bridge along Pankey Road (southern extension) would be raised to accommodate post-development flows and avoid flooding; and (4) a letter will be obtained from the Campus Park West property owners stating that they do not object to the described alteration of floodplain conditions within their property (refer to Sections 9 and 11 of the Preliminary Hydrology and Hydraulics Study in Appendix L). It should also be noted that the assessment of potential Project-related flooding impacts in Appendix L (including the HEC-RAS analysis) is based on the assumption that any upstream development that contributes runoff to Horse Ranch Creek would be required to detain, treat and release post-development 100-year storm waters such that the quantity, quality, discharge rate/time, location, and concentration of such runoff would be substantially the same as pre-development conditions (refer to Sections 2 and 11 of the Preliminary Hydrology and Hydraulics Study in Appendix L).

Based on the above described measures and assumptions, no significant flooding impacts to existing, Proposed Project, or off-site facilities within the pre- or post-development Horse Ranch Creek floodplain are anticipated.

The Proposed Project would generate increased storm flows within the site due to the construction of additional impervious surfaces and related effects such reduced infiltration. The effects of this increased flow would be addressed through the inclusion of drainage facilities such as the use of a detention basin and appropriately sized storm drain facilities (e.g., pipelines, swales, and inlets as described here, as well as listed on Table 1-13 and in Chapter 8.0). Specifically, the Project Preliminary Hydrology and Hydraulics Study concludes that "[W]ith the proposed detention basin, the post-development peak runoff leaving the subdivision boundary will be less than or equal to the pre-development volumes" (refer to Section 2 of the Preliminary Hydrology and Hydraulics Study in Appendix L). Proposed Project storm drain facilities (including those associated with potential off-site Project structures) also would be designed to accommodate a 100-year storm event, per requirements in the County of San Diego Design and Procedure Manual (County 1993). Based on the described design and flow control measures, impacts related to the capacity of on- or off-site storm drain facilities and associated flooding hazards from implementation of the Proposed Project would be **less than significant**.

<u>Potential Impacts Associated with Runoff Volumes/Velocities (Guideline No. 2)</u>

As previously noted, existing peak 100-year storm flow from the Project site (including flows from upstream areas) is approximately 8,802 cfs at the southern property boundary. Implementation of the Proposed Project would result in the addition of impervious surfaces, including pavement and structures, with such areas increasing both the volume and velocity of runoff within the Project site by (for example) reducing infiltration capacity and concentrating flows. The Project design includes a number of measures to reduce the peak runoff volume and velocity of on-site flows, and to control post-development runoff from the Project site during design storm events, including:

- Incorporating extensive pervious areas (i.e., parks and open space) within the Project design to maintain runoff and infiltration capacities (with approximately 50 percent of the total Project site to encompass parks and open space).

- Minimizing impervious surfaces within the proposed development area wherever feasible by means such as the use of landscaping.

- Using native and/or drought-tolerant landscaping varieties to reduce irrigation requirements.

- Using unlined drainage facilities (e.g., vegetated swales) in appropriate areas to allow infiltration.
- Employing irrigation management techniques to minimize/control water applications (e.g., use of moisture and pressure sensors to limit irrigation and/or shut off flows to broken pipelines/sprinkler heads).
- Installing energy dissipators (e.g., riprap aprons) at all storm drain outlets to reduce flow velocities.
- Using detention facilities to regulate flows within and from the site (refer to the previous discussion of flooding and storm drain capacity for additional information).

With the inclusion of these proposed design measures (refer to Table 1-13 for the complete list of design measures), post-development runoff leaving the Project site boundary would be less than or equal to the pre-development volumes (with a calculated post-development 100-year storm flow of approximately 8,800 cfs from the Project site, refer to Sections 2 and 11 of the Preliminary Hydrology and Hydraulics Study in Appendix L, and the previous discussion of flooding and storm drain capacity).

As a result of the described flow regulation measures, the associated projected runoff leaving the site, and the proposed use of energy dissipation structures, no significant impacts related to increased runoff volumes or velocities would occur from implementation of the Proposed Project. Based on this conclusion and the relatively small area of new impervious surface associated with proposed off-site roadway and utility corridors (i.e., approximately 9 acres), associated impacts to post-development runoff volumes and velocities from Project implementation would be **less than significant**.

Pursuant to previously described requirements under County guidelines and related NDPES criteria, a Preliminary HMP was prepared to assess potential hydromodification impacts from the Proposed Project (Appendix L). This study evaluates pre- and post-development hydrologic characteristics at four Points of Compliance, defined as areas "…where discharge from the project site leaves the project boundary." (Refer to the Project Description Section of the HMP in Appendix L). Based on these data, the Project was assessed for conformance with applicable hydromodification criteria from adopted regulatory sources, including the San Diego Draft HMP and the County Interim Hydromodification Criteria (refer to the Summary Section of the HMP in Appendix L). The Project HMP concludes that, "…the proposed detention basin is adequate to mitigate the anticipated post-development runoff to satisfy the criteria set forth in…the San Diego Draft HMP. No damage to downstream facilities is anticipated due to hydromodification concerns." (Refer to the Proposed Mitigation Section of the HMP in Appendix L). Accordingly, potential hydromodification impacts from implementation of the Proposed Project would be **less than significant**.

<u>Potential Impacts Associated with Water Quality (Guidelines No. 5 through 8)</u>

Potential Project-related water quality impacts are associated with both short-term construction activities and long-term operation and maintenance. Project-related activities would not result in any direct effects to groundwater quality through activities such as underground storage of hazardous materials. Accordingly, potential impacts to groundwater quality would be limited to the percolation of surface runoff and associated contaminants generated within the Project site and associated off-site facility areas. The following assessment of potential water quality impacts is therefore applicable to both surface and groundwater resources.

Short-term Construction Impacts

Potential water quality impacts related to Project construction include erosion/sedimentation, the on-site use and storage of construction-related hazardous materials (e.g., fuels, etc.), generation of debris from demolition activities, and disposal of extracted groundwater (if required), as described below.

Erosion and Sedimentation. Proposed excavation, grading, and construction activities on the Project site potentially could result in related erosion and off-site sediment transport (sedimentation). Project activities would involve the removal of surface stabilizing features such as vegetation, excavation of existing compacted materials from cut areas, redeposition of excavated (and/or imported) material as fill in proposed development sites, potential sediment generation from paving activities, and potential erosion from disposal of extracted groundwater (if required). Project-related erosion could result in the influx of sediment into downstream receiving waters, with associated water quality effects such as turbidity and transport of other contaminants that tend to adhere to sediment particles.

While graded, excavated and filled areas associated with construction activities would be stabilized through efforts such as compaction and installation of hardscape and landscaping, erosion potential would be higher in the short-term than for existing conditions. Developed areas would be especially susceptible to erosion between the beginning of grading/construction and the installation of pavement or establishment of permanent cover in landscaped areas. Erosion and sedimentation are not considered to be significant long-term concerns for the Proposed Project because developed areas would be stabilized through installation of hardscape or landscaping. The Project also would incorporate long-term water quality controls pursuant to County and NPDES guidelines, including (among other efforts) measures that would avoid or reduce off-site sediment transport. This would include efforts such as the use of vegetated drainage swales, runoff detention, energy dissipators, inlet filters, irrigation controls, and drainage facility maintenance (i.e., to remove accumulated sediment).

The short-term water quality effects from Project-related erosion and sedimentation potentially could affect downstream waters and associated wildlife habitats, with such impacts considered potentially significant. Short-term (construction) erosion and sedimentation impacts would be addressed through conformance with the NPDES Construction Permit and associated County standards, as described in Subchapter 3.2 of this EIR. This would include implementing an NPDES/County SWPPP for proposed construction, including (but not limited to) erosion and sedimentation BMPs. The Project SWMP also identifies a number of preliminary construction BMPs, including measures related to erosion/sedimentation (Appendix L). These measures, along with potential erosion/sedimentation from other sources (e.g., the regulatory and industry sources listed above under Regulatory Framework), are described in Subchapter 3.2. Based on the implementation of appropriate erosion and sediment control BMPs as part of (and in conformance with) the Project SWPPP, associated erosion/sedimentation impacts would be **less than significant**. Erosion and sedimentation controls implemented for the Proposed Project would be further defined during the NPDES/County permitting and SWPPP process, with the resulting BMPs taking priority over the more general types of standard industry measures listed in Subchapter 3.2.

Construction-related Hazardous Materials. Project construction would involve the on-site use and/or storage of hazardous materials such as fuels, lubricants, solvents, concrete, paint, and portable septic system wastes. The accidental discharge of such materials during Project construction potentially could result in significant impacts if such materials reach downstream receiving waters, particularly materials such as petroleum compounds that are potentially toxic to aquatic species in low concentrations. Implementation of a SWPPP would be required under NPDES and (potentially) County guidelines, and would include detailed measures to avoid or mitigate potential impacts related to the use and potential discharge of construction-related hazardous materials. While detailed BMPs would be determined as part

of the NPDES/SWPPP process based on site-specific parameters, they are likely to include the standard measures from the Project SWMP, NPDES Permit, and County Stormwater Ordinance/Manual, as well as the regulatory/industry sources referenced under Regulatory Framework.

Based on the use of appropriate BMPs as part of a SWPPP under applicable NPDES and County guidelines, impacts due to construction-related hazardous materials as a result of Project implementation would be **less than significant**. Construction-related hazardous materials controls implemented for the Project would be further defined during the NPDES permitting and NPDES/County SWPPP process, with the resulting BMPs taking priority over the more general types of standard industry measures in Table 1-13 and Chapter 8.0, List of Mitigation Measures and Environmental Design Considerations.

Demolition-related Debris Generation. The Proposed Project would involve the demolition of existing facilities including structures and pavement. These activities would generate variable amounts of construction debris, potentially including concrete, asphalt, glass, metal, drywall, paint, insulation, fabric and wood. Demolition activities could also potentially generate particulates, as well as contaminants related to hazardous materials including lead-based paint and asbestos insulation. The introduction of demolition-related particulates or hazardous material contaminants into the local storm drain system could potentially result in significant downstream water quality impacts.

Project construction would be subject to a number of regulatory controls related to demolition, including NPDES/SWPPP requirements and hazardous materials controls described in Section 4.1.3 of this Subchapter. The Project SWPPP would include measures to address potential effects associated with contaminant generation from demolition activities, with detailed requirements to be determined as part of the SWPPP process. A number of standard BMPs that would likely be applicable to Project demolition efforts are listed in Table 1-13 and Chapter 8.0, List of Mitigation Measures and Environmental Design Considerations. Demolition-related activities involving hazardous materials would conform to the associated regulatory requirements described in Section 4.1.3 of this EIR. Such conformance would include applicable measures to regulate sampling and monitoring procedures; contain/abate contaminated materials during construction; provide protective gear for workers handling contaminated materials; ensure acceptable exposure levels; and provide for safe and appropriate handling, transport and disposal of hazardous materials generated during Project construction.

Based on implementation of appropriate BMPs as part of (and in conformance with) an NPDES/County SWPPP, as well as conformance with applicable hazardous material regulations, potential water quality impacts from Project-related generation of demolition debris would be **less than significant**. Project controls for demolition-related debris generation would be further defined during the NPDES permitting and SWPPP process, with the resulting BMPs taking priority over the more general types of standard industry measures listed in Table 1-13 and Chapter 8.0, List of Mitigation Measures and Environmental Design Considerations.

Disposal of Extracted Groundwater. Shallow groundwater is expected to be encountered during Project-related excavation and construction. Disposal of groundwater extracted during construction activities into local drainages and/or storm drain facilities could potentially generate significant water quality impacts through erosion/sedimentation (i.e., if discharged onto graded or unstable areas), or the possible occurrence of contaminants in local groundwater aquifers. Project construction would require conformance with applicable NPDES Groundwater Permit criteria prior to disposal of extracted groundwater (as outlined under Regulatory Framework). While specific BMPs to address potential water quality concerns from disposal of extracted groundwater would be determined based on site-specific parameters, they would likely include the use of erosion prevention and sediment control devices similar to those described in Subchapter 3.2 for applicable conditions (e.g., if extracted groundwater is discharged onto graded or unstable areas); testing, filtering, and/or treatment of extracted groundwater prior to

discharge if required for NPDES permit conformance; and removal of groundwater by a licensed operator for treatment and disposal if required for NPDES permit conformance. Based on the required conformance with NPDES Groundwater Extraction and Waste Discharge Permit standards and the implementation of related BMPs, water quality impacts from Project-related disposal of extracted groundwater are anticipated to be **less than significant**.

Long-term Operation and Maintenance Impacts

The Project SWMP (Appendix L) identifies pollutants of concern and appropriate control measures related to development of the Proposed Project, based on procedures identified in the County Stormwater Ordinance/Manual and SUSMP, as well as the related NPDES Storm Water Municipal Permit. The Proposed Project is identified as a SUSMP "Priority Project" due to the inclusion of proposed development categories such as attached and detached residential properties, parking areas, and roadways. Anticipated contaminants associated with the Proposed Project include sediment, nutrients, heavy metals, oil and grease, organic compounds, oxygen demanding substances, pesticides, trash and debris, and bacteria and viruses (Appendix L). Urban contaminants accumulate in areas such as streets, parking areas, and drainage facilities, and are picked up in runoff during storm events. Runoff within the Project site would increase as a result of constructing impervious surfaces, with a corresponding increase in contaminant loading potential. Based on these conditions, long-term Project operation could result in the on- and off-site transport of urban contaminants and associated significant effects such as increased turbidity, oxygen depletion and toxicity to attendant species in downstream receiving waters. Affected downstream waters may include portions the San Luis Rey River and associated coastal waters that are included on the current (2006) list of CWA Section 303(d) list of impaired waters.

The Proposed Project would conform to applicable NPDES and County storm water standards, with such conformance to include the use of appropriate post-construction site design, source control and treatment control BMPs. Specific proposed BMPs are identified in the Project SWMP (Appendix L), with these measures summarized below and followed by a discussion of associated monitoring and maintenance activities.

<u>Site Design BMPs</u>. Site design BMPs are intended to avoid and/or control post-development runoff, erosion potential and contaminant generation by mimicking the natural hydrologic regime to the MEP. Specific site design BMPs identified in the SWMP include similar measures described above under the evaluation of potential effects to Runoff Volumes/Velocities such as using detention facilities, maximizing open space retention, minimizing pervious areas, and installing energy dissipators, as well as the following: (1) routing storm flows from impervious areas such as sidewalks and patios into landscaping; (2) minimizing construction impacts in drainage courses wherever feasible; (3) minimizing impacts to slopes; and (4) collecting concentrated flows in stabilized drains and channels (refer to Appendix L for additional information). All of the proposed site design BMPs would help reduce long-term urban contaminant generation by minimizing runoff volumes and velocities, retaining permeable areas, increasing on-site filtering and infiltration, and minimizing erosion/sedimentation potential.

<u>Source Control BMPs</u>. Source control BMPs are intended to avoid or minimize the introduction of contaminants into storm drains and natural drainages by reducing on-site contaminant generation and off-site contaminant transport to the MEP. Specific source control BMPs are identified in the Project SWMP, and include measures such as the following: (1) installing "no dumping" stencils/tiles and/or signs at applicable locations (e.g., storm drain inlets and drainage access points); (2) providing paved, enclosed and/or covered areas for material/trash storage; (3) using landscape and irrigation system design measures such as native/drought-tolerant vegetation and efficient irrigation practices (e.g., moisture and pressure sensors) to reduce irrigation and chemical application requirements; (4) installing permeable pavement in

applicable areas (e.g., parking areas and walkways); (5) incorporating landscaping into parking area drainage design; (6) providing self-containment (e.g., drainage collection sumps), pre-treatment (e.g., clarifiers), and/or sanitary sewer connections for uses such as loading docks, maintenance/fueling areas, and outdoor processing sites; (7) implementing regular street sweeping/vacuuming; and (8) distributing educational materials to property owners to help reduce pollutant discharge (e.g., for topics such as yard maintenance, pesticide/fertilizer applications, and pet waste management (Appendix L). All of the proposed source control BMPs would help improve long-term water quality within and downstream from the Project site by avoiding or minimizing contaminant generation and exposure to storm flows at the source.

Treatment Control BMPs. Treatment control (or structural) BMPs are designed to remove pollutants from urban runoff for a design storm event to the MEP through means such as filtering, treatment, or infiltration. The use of identified site design and source control BMPs is intended to reduce treatment requirements by preventing pollutants from entering storm water runoff and reducing runoff volumes and velocities. Treatment control BMPs would still be required for proposed on- and off-site facilities, however, and would incorporate either volume- or flow-based treatment control design standards (per County and NPDES standards). Specific treatment control BMPs identified in the Project SWMP include bio-filtration (vegetated) swales, and storm drain inlet filter inserts (drainage inserts). The proposed treatment control BMPs would help to improve long-term water quality within and downstream of the Project site and off-site facility areas by treating/removing contaminants from urban runoff prior to downstream discharge. Proposed bio-filtration swales have a medium removal efficiency for contaminants including sediment, heavy metals, and oil and grease, while drainage inserts have a medium removal efficiency for trash and debris. The combination of these two types of treatment BMPs is anticipated to provide a level of treatment adequate to meet all associated County and NPDES requirements (Appendix L). Additional discussion of proposed treatment control BMP design, locations and performance criteria is provided in the Project SWMP (Appendix L).

As previously noted under Regulatory Framework, the current County Storm Water Standards were most recently updated in 2003 and do not specifically address all requirements under the 2007 Municipal Permit. It is anticipated that updated County Storm Water Standards will be adopted by January 2008 (in line with requirements in the current Municipal Permit), and that the design of the post-construction Project storm water and water quality systems would reflect the revised standards as applicable.

Post-construction BMP Monitoring/Maintenance Schedules and Responsibilities. Identified BMPs include physical facilities such as vegetated swales and drainage inserts, as well as programs/activities including street sweeping/vacuuming, landscape/irrigation management, and distribution of informational/educational materials to property owners. All Project-related BMP facilities would be located on site or within applicable off-site facility areas. Monitoring and maintenance efforts related to BMPs within proposed residential, town center and park areas would be the responsibility of the associated HOA. For BMPs located in commercial and professional office sites, the associated property owners and/or tenants would be responsible for monitoring and maintenance. The proposed bio-filtration swales and drainage inserts associated with public roadways are classified as Third Category BMPs in the County SUSMP. This classification requires assurance to the satisfaction of the County that appropriate ongoing maintenance would be provided, and typically involves the County taking responsibility for such maintenance via dedication of the associated facilities. Funding for long-term monitoring and maintenance of the described facilities under this scenario would be provided through the creation of a special assessment under the authority of the County Flood Control District, with the assessment collected as part of individual property taxes. Because it is anticipated that a substantial time period would be required to establish the described funding mechanism, a developer fee would be collected to ensure adequate funding for BMP monitoring and maintenance during the initial 24-month period after Project construction. Specific monitoring and maintenance efforts associated with proposed BMP facilities and

programs include monitoring and reporting to document that programs/activities are being implemented as designed, inspection, and maintenance of physical facilities, and making necessary modifications to ensure that intended BMP functions and regulatory requirements are being met (as summarized in Table 1-13 and Chapter 8.0, with additional information provided in Appendix L).

Based on implementation of BMPs required for conformance with County storm water standards and the related NPDES Municipal Storm Water Permit, water quality impacts would be **less than significant** with respect to Project-related long-term generation of urban contaminants.

Potential Impacts Associated with Drainage Alteration

As described under Existing Conditions, surface drainage within the Project site and adjacent off-site facility areas is variable in direction, with all associated flows ultimately draining to the San Luis Rey River. Project implementation would involve grading, excavation, and construction activities to accommodate the proposed development, with some related alteration of local drainage patterns. The most notable of these proposed modifications involves routing flows around the existing box culvert where the northern extension of Pankey Road crosses Horse Ranch Creek to avoid flooding hazards (as previously described). This proposed diversion would be located completely within the Project site, with the diverted flows extending for a linear distance of approximately 465 feet before reentering the existing drainage path (refer to Section 11 of the Preliminary Hydrology and Hydraulics Study in Appendix L). Based on the described conditions, proposed drainage modifications would be generally minor in nature and extent, with flows within and from the Project site and applicable off-site areas continuing to move predominantly west and south before ultimately reaching the San Luis Rey River and the Pacific Ocean.

On-site portions of Horse Ranch Creek and most associated tributaries would be retained as natural drainage features, with no substantial alteration. Encroachment into these larger on-site drainages would be limited to relatively minor disturbance associated with facilities such as roads, utilities and detention structures, with culverts used to accommodate Project access roads while maintaining existing flow conditions. A number of additional facilities would be constructed as part of the Project drainage system, including storm drain pipelines and vegetated swales, as previously described (refer to the previous discussions of Runoff Volumes/Velocities and Water Quality, as well as Appendix L for additional information). These facilities largely would maintain existing flow locations and patterns, with several also addressing potential water quality issues as described above in this section. Based on the described retention of most on-site drainage courses and the proposed drainage system, implementation of the Proposed Project (including off-site facilities) would not substantially alter on- or off-site drainage patterns or directions, with impacts anticipated to be **less than significant**.

Potential Impacts Associated with Groundwater

Shallow groundwater was observed at depths of between 1.5 and 12 feet below the surface in alluvium, and 28 to 56 feet in terrace deposits during geotechnical investigation (Appendix E). Shallow groundwater is likely present in other portions of the Project site as well, including smaller alluvial drainages. Implementation of the Proposed Project would not involve the extraction of local groundwater for purposes such as consumption or irrigation, with no associated direct impacts to groundwater resources. The Project would entail the construction of impervious surfaces that would reduce local infiltration/recharge capacity, although no significant impacts are anticipated due to the previously described design measures to retain pervious surfaces and maintain or reduce runoff from the site (e.g., through the use of detention facilities).

It is considered likely that shallow groundwater would be encountered during Project construction, with associated temporary dewatering efforts subject to pertinent NPDES requirements. Additional discussion

of these requirements is provided above under Regulatory Framework and in the discussion of water quality. Based on the temporary nature of potential dewatering activities associated with Project construction, related impacts to local groundwater resources such as aquifer drawdown or depletion would be **less than significant**.

Cumulative Impact Analysis

As described in the preceding analysis, implementation of the Proposed Project would require conformance with a number of regulatory requirements related to hydrology and water quality, including applicable elements of the CWA, County storm water standards, NPDES, and RWQCB Basin Plan. Based on such conformance (including the design measures described in Chapter 8.0 of this EIR), all identified Project-level hydrology and water quality impacts from the Proposed Project would be avoided or reduced below a level of significance.

The described regulatory requirements constitute a regional effort to implement hydrology and water quality protections through a watershed-based program designed to meet applicable criteria such as Basin Plan Beneficial Uses and Water Quality Objectives. To this end, these standards require the implementation of URMPs that will reduce runoff and contaminant discharges to the MEP, with the Municipal Permit identifying the goal of "[p]romoting attainment of water quality objectives necessary to support designated beneficial uses." The County has implemented all of these requirements in the form of the SUSMP, Stormwater Ordinance/Manual and URMPs, as well as applicable education, planning, and enforcement procedures. Based on the described regional/watershed based approach required for hydrology and water quality issues in existing regulatory standards, and the fact that conformance with these requirements would be required for all identified projects within the cumulative projects area (including the Proposed Project), cumulative hydrology/water quality impacts would be **less than significant** from Project implementation.

Mitigation

Because no significant impacts were identified, mitigation is not required.

Conclusion

Based on the discussions provided above, potential Project-specific and cumulative hydrology and water quality impacts associated with implementation of the Proposed Project would be effectively avoided or reduced below identified significance guidelines through implementation of recommendations provided in the Project Preliminary Hydrology and Hydraulics Study and SWMP, as well as conformance with established regulatory requirements. Accordingly, no mitigation measures are required or proposed.

4.1.3 Hazards and Hazardous Materials

The 1981 EIR did not discuss hazards and hazardous materials. The 1983 EIR identified the handling and storage of chemicals associated with the Hewlett-Packard development to be less than significant due to appropriate handling procedures. The two types of hazardous materials would have included raw chemicals used for processes and plant maintenance and waste from plant operations. Because the current Proposed Project would not include industrial use, no such chemicals would be handled on site, nor require transportation to and from the site. Accordingly, the analysis in the 1983 EIR is no longer applicable. The 1983 EIR also did not discuss hazardous impacts associated with agricultural uses on the site and its impacts to surface water. In addition, no discussion of fire hazards is presented in the previous EIR.

These issues lead to the need for new subsequent analysis to hazards and hazardous materials because no hazardous materials would be used or transported on or off site and the previous documents failed to

include a discussion of potential hazardous materials currently on site. The reader is referred to text below for a new evaluation of hazards and hazardous materials for the Project.

A Phase I Environmental Site Assessment and Limited Chemical Residue Survey (Geosoils, Inc. 2002) were performed for the Project site (and adjacent Palomar College site) to assess the potential for the presence of hazardous materials/waste, restricted agricultural residues, and petroleum contamination. These studies are summarized below, with the complete reports included in Appendix M of this EIR. Additionally, an FPP/FMP (Hunt 2009) was prepared for the Project (Appendix J).

Existing Conditions

Hazardous Materials

Two small, aboveground storage tanks were observed near an existing residential trailer in the northern area of the Project site. Those tanks are currently used for water and propane storage. There are no surface signs to indicate that any other fuel storage tanks are or have been located either above- or belowground on the Project site. No known chemicals are currently being stored on the Project site.

Transformers observed on overhead power poles, while a potential source of polychlorinated biphenyls (PCBs), are not likely to contain high concentrations of PCBs, and should any leaks from these transformers develop, San Diego Gas and Electric (SDG&E) would be responsible for site cleanup. No other potential sources of PCBs are known to exist on site. No overhead main distribution and/or transmission lines were observed on site.

Visible on-site conditions include the presence of trash and debris. Potential hazardous materials sources in the northern area of the Project site include: a parked travel bus with associated engine parts near the entrance to the Project site; dumped concrete waste on the north side of Pala Mesa Heights Road; a small pile of waste lumber along a southwesterly sloping canyon; and household trash, metal/plastic debris and abandoned appliances, dumped furniture, and a 55-gallon plastic drum in the canyon north of an existing residence. There is evidence of former structures in at least two areas in the northeasterly portion of the Project site, as well as a concrete foundation and old utility lines along the southern edge of the canyon.

Trash and debris in the southern area of the Project site include concrete fragments, household trash, waste lumber, landscape wastes, metal fragments, and abandoned appliances. Also found in the southern area of the Project site were several goat skeletons scattered locally within the northeastern portion, decomposed goats found within an abandoned pump-house, and two cattle carcasses near the southeastern portion of the Project site.

Small patches of discolored surface soils (i.e., staining) were noted around the travel bus and associated engine parts observed on site. There were no other obvious signs of surface discoloration, spills, or releases of hazardous materials on site. No on-site structures on the Project site appear to contain asbestos or sources of lead paint. Radon was not studied because the potential for radon gas accumulation is generally low in southern California.

The site survey concluded that no substantial hazardous materials were on or in the vicinity of the Project site.

Government Document and Database Review

Government records database (November 2001) indicate there are eight mapped risk sites in and around the northern area of the Project site. One risk site was associated with a 500-gallon underground storage

tank permitted in 1994 by the SWRCB on the Project site; that storage tank was noted as 'closed by removal.' No other databases noted an active case or contamination associated with this risk site.

There are 11 mapped risk sites around the southern area of the Project site. One of those listings was associated with an active citrus orchard directly east of the southern area. That listing was related to a diesel tank and propane tank, both stored above ground. No other databases noted an active case or contamination associated with this site. The 10 other risk sites, listed primarily in the SWRCB permitted tank database and the County Environmental Health Services database, were not dually listed in other databases as active cases or contaminated. These listings are not expected to represent a potential environmental concern to the subject property.

There were nine permitted underground and aboveground storage tanks in the study area; none of those was found on the Project site. There were no solid waste landfills noted within or near the Project site.

There were 29 "unmapped" sites found in the database search. Unmapped sites refer to those sites that do not have adequate address information furnished to allow agencies to plot their locations. Based upon the site assessment conclusions, these sites are not anticipated to represent an environmental concern in relation to the Project site.

A review of the Munger Map Book for oil and gas fields (1999) did not indicate that oil or gas wells were located on the Project site.

Files at the County Department of Environmental Health (DEH) indicate that cleanup of an old landfill and oil contamination on land south of the Project site was previously conducted. Specific to the Project site, the DEH files indicated that permits to operate underground storage tanks were in effect in 1986, and that the tanks were assigned exemption status due to their usage (i.e., agricultural) in 1987, and removed from the site in 1992. (This is based on a 1993 compliance report noting that seven previously exempt tanks were removed from the site.) Compliance reports from 1999 and 2001 described hazardous waste inventories, including waste oil filters, waste oil, and mixed oil; however, no significant violations were reported.

Hydrogeologic Review

There are visible signs of two water wells on the Project site: one active well on the southern edge of the northern area and one abandoned well in the southern area. A previous owner suggested that an old well had existed west of the active well and that one may have existed within the I-15 easement, directly adjacent to the northwest corner of the southern area. To protect local groundwater quality, the applicant has obtained the appropriate permits and has destroyed these abandoned water wells.

Limited Chemical Residue Survey

A limited residue survey involved collection of eight on-site soil samples collected from existing earth materials and one surface water sample from a surface outlet pipe that originates off site on an adjacent citrus farm. Based on a list of 18 Hazardous Agricultural Substances generated by the County DEH, sample chemical testing included testing for the following substances:

- Chlorinated pesticides
- Organophosphorous pesticides
- Chlorinated herbicides
- Total organic lead

- Total petroleum hydrocarbons
- pH (measure of acidity or alkalinity)
- Nitrates

Concentrations of chlorinated pesticides – DDT/DDD/DDE (i.e., $DDT_{(Total)}$) – were detected in laboratory tests in six of the samples, ranging from 0.0024 milligrams per kilogram (mg/kg) to 0.894 mg/kg. For comparison purposes, the regulatory action level for hazardous waste criteria for $DDT_{(Total)}$ is 1.0 mg/kg.

Similarly, as discussed in Section 4.1.2, Hydrology and Water Quality of this subchapter, the nitrates identified on site fall within allowable levels (43 mg/l were identified, and the threshold is 45 mg/l)

Laboratory test results were reported as "less than detection levels" for organophosphorus pesticides, chlorinated herbicides, total organic lead, and total petroleum hydrocarbons. Laboratory test results for pH indicated that the soils and water were slightly acidic to slightly basic (pH of 6.5 to 8.0).

Interviews

The current and previous property owners were interviewed to gather first-hand historical data about the Project site. The previous owner noted that there were two wells on the Project site; there may have been a previous well associated with the residence in the northern area. Also, the former owner indicated that there were five aboveground fuel storage tanks associated with the off-site citrus orchards directly east of the southern area. Pesticide application was permitted within the off-site orchards through County DEH. Wind machines used in the on-site orchards were powered by gasoline via fuel tanks housed within the metal tower legs.

The current property owner leases to a non-commercial cattle raising organization (no cattle are bought or sold for profit). He noted that he was unaware of any storage tanks (aboveground or underground) or hazardous waste/restricted chemicals stored or located on the subject property. The current property owner noted one, old, water well on the site as well as the recent well associated with the residence. The owner was unaware of any hazardous materials issues associated with the subject property.

Wildland Fire Hazards

Fire protection within the Fallbrook area is provided by two agencies: (1) CalFire, which serves all wildland fires in the Fallbrook Community Plan area; and (2) NCFPD, which is comprised of the Rainbow Volunteer Fire District and Fallbrook Fire Department. The Project site is within the service area of the CalFire/NCFPD for fire protection. Fire Station No. 4 is located approximately one mile from the closest portion of the Project site and approximately 2.5 miles from the farthest developed area within the northwest corner of the Project site. A discussion of response times and staff is included in Section 4.1.6, Utilities and Service Systems/Public Services.

The Project site is located within a Wildland Urban Interface fire hazard area that is susceptible to fire that could start on or adjacent to the site within flammable vegetation or from I-15 activities. In October 2007, the northeastern portion of the property was burned during a wildfire. With the exception of minor grass fires, the remaining vegetation surrounding the property has not burned in recent years, thereby creating vulnerability of the Project site to a significant fire.

Guidelines for the Determination of Significance

Guidelines of Significance

A significant impact to public safety or the environment would occur if:

Hazardous Substances

1. The Proposed Project is located on or within one-quarter mile from a site identified in one of the regulatory databases compiled pursuant to Government Code Section 65962.5 or is otherwise known to have been the subject of a release of hazardous substances, and as a result the project may result in a significant hazard to the public or the environment..

2. The Proposed Project could result in human or environmental exposure to soils or groundwater that exceed the U.S. Environmental Protection Agency Region 9 Preliminary Remediation Goals, California Environmental Protection Agency California Human Health Screening Levels, or Primary State or Federal Maximum Contaminant Levels for applicable contaminants and the exposure would represent a hazard to the public or the environment.

Wildland Fire Hazards

3. The Proposed Project would expose people or structures to a significant risk of loss, injury, or death involving wildfires if it would:

    a. Fail to demonstrate compliance with applicable fire regulations, including but not limited to the California Public Resources Code; County Consolidated Fire Code; and the Memorandum of Understanding between the USFWS, CDFG, CalFire, San Diego County Fire Chief's Association and the Fire District's Association of San Diego County.

    b. Require the preparation of a comprehensive FPP or equivalent fire fuel assessment as required by the Fire Agency Having Jurisdiction (FAHJ) or the County of San Diego, and the project is inconsistent with the recommendations of the FPP or assessment.

Guideline Sources

Guideline No. 1 recognizes that regulatory databases may contain records of contamination on the project site or in the surrounding area that could present a hazard to people or the environment. This guideline also is based on the State CEQA Guidelines, Appendix G. Guideline No. 2 is included to address the fact that soil or water contamination that exceeds established regulatory thresholds for applicable contaminants could represent a hazard to the public or environment. Guideline No. 3 is based on the Project's conformance to the Public Resources Code; County Consolidated Fire Code; and the Memorandum of Understanding between the USFWS, CDFG, CDF, County Fire Chief's Association, and the Fire District's Association of San Diego County.

Analysis of Project Effects and Determination of Significance

Subject to the Release of Existing Hazardous Substances (Guideline No. 1)

As stated above, government records database (November 2001) indicate there are eight mapped risk sites in and around the northern area of the Project site. There are 11 mapped risk sites around the southern area of the Project site. These listings are not expected to represent a potential environmental concern to

the subject property because they have been either removed or are reported in the SWRCB permitted tank database or in the County Environmental Health Services HE 17 database. There were 29 "unmapped" sites found in the database search. Unmapped sites refer to those sites that do not have adequate address information furnished to allow agencies to plot their locations. Every effort is made by GeoSoils, Inc. to evaluate if any of these sites were located within the extended search radius of the subject property. Based upon their review, none of the unmapped sites appeared to be within the study radius or may be situated down groundwater gradient and/or lower in elevation than the Project site. Accordingly, these sites are not anticipated to represent an environmental concern in relation to the Project site.

In consideration of the review of government documents and databases, it can be concluded that hazards impacts to and from the Project site would be **less than significant**.

Result in Human or Environmental Exposures to Hazardous Materials (Guideline No. 2)

The Proposed Project would not result in human or environmental exposure to soils or groundwater that exceeds the U.S. Environmental Protection Agency Region 9 Preliminary Remediation Goals, California Environmental Protection Agency California Human Health Screening Levels, or Primary State or Federal Maximum Contaminant Levels for applicable contaminants.

Although specific businesses occupying the proposed commercial or office professional buildings are unknown at this time, it is possible that these future tenants may pursue uses that would require the use, storage, transport, and/or disposal of potentially hazardous materials. Should such uses be proposed, they would be subject to a number of regulatory requirements governing the handling, storage, and disposal of hazardous materials used on site. For such uses, a risk assessment in conformance with all pertinent agency regulations, as listed in Table 4.1.3-1, Summary of Regulations Potentially Applicable to Campus Park Commercial/Office Professional Uses, would be required. Future tenants also would be responsible for obtaining applicable permits from regulatory agencies (i.e., DEH, federal and state EPA). Acquisition of applicable permits and compliance with applicable regulatory standards would avoid potentially significant hazardous materials impacts associated with proposed commercial or office professional uses.

As described above, limited residue survey involved collection of eight soil samples and one surface water sample. No exceedances of allowed concentrations were identified, and **no impacts** are assessed.

Expose People or Structures to a Significant Risk of Loss, Injury, or Death Involving Wildfires (Guideline No. 3)

As discussed in Section 1.1.2, Hunt drafted an FPP/FMP (2009). Specific details and requirements of the FPP/FMP can be found in Appendix J.

A vegetation management/fuel modification zone (management zone), or defensible space, is generally defined as that area around a structure where material capable of causing fire has been cleared, reduced, or changed in order to act as a barrier between an advancing fire and the structure. Three management zones were established for the Proposed Project based on local conditions and estimated worst-case scenarios derived from previous fire events, seasonal probabilities, and wind/weather characteristics within the southern California area. The management zones are discussed below and shown on Figure 1-26. Specific details regarding requirements within each management zone are provided in the FPP/FMP (see Appendix J, Section 5).

In the northern area, a 200-foot-wide vegetation management zone would be established adjacent to the single-family residential area to the east and north. A 125-foot-wide management zone would be located west of this single-family residential area and also along the eastern side of the single-family development

in the southern area. A 125-foot-wide management zone also would be established along the southeastern side of the single-family residences and along the eastern edge of the multi-family residential areas MF-1 and MF-2 in the center of the Project site (unless the future off-site abutting tract [Meadowood] is built and has approved, proper fuel modification zones directly abutting the Project site in these areas). Any lots within the balance of the proposed development bordering on open space areas, flammable vegetation, parks and/or the sports complex without an internal defense zone would have a 100-foot-wide management zone. Refer to Figure 1-26 for the locations of the vegetation management zones.

Fuel Modification Zones. Three fuel modification zones are proposed and are summarized as follows (refer to Appendix J, Section 5 for a complete description):

Zone 1. This zone would encompass the area within 30 feet of all sides of all structures (or out to the private lot line if less). This defensible space would be an irrigated, maintained, wet zone with fire-restrictive ground cover or lawn. No flammable or combustible growth or dead or dying vegetation would be allowed. There are specific restrictions on ornamental vegetation types, heights, and locations. The objective is to prevent the spread of fire to or from a structure.

Zone 2. This zone encompasses the area from 31 feet out to 50 feet from all sides of all structures. The zone would be an irrigated wet zone of low volume, fire resistive, drought tolerant, low-profile fuel (native grasses lower than 3 inches), and fire-resistive shrubs and trees. No dry grass would be allowed. There are specific restrictions on tree and shrubs. The objective is to prevent the spread of fire to trees from vegetation of the ground.

Zone 3. This zone encompasses the area from 51 feet out to prescribed vegetation management zone distances (200, 125, or 100 feet). This may or may not be an irrigated zone, with irrigation possibly necessary on new plantings. All flammable vegetation in this zone would be separated, thinned, pruned, or removed. Restrictions would be placed on tree spacing, plant height, and maintenance.

All new power lines would be undergrounded. In addition, a 30-foot-wide management area also would be required around any power line or pipeline easements. Vegetation within and/or adjacent to planters, medians, streets, and the like would be required to be fire resistive and not obstructive to emergency vehicle/personnel access. Vegetation would not be permitted to overhang roadways, and tree canopies would need to be spaced apart. A management zone of 30 feet would be required on each side of roadways throughout the development. This zone would be irrigated and landscaped with fire resistive vegetation, including trees. A minimum 10-foot clearance would be required for removal of flammable vegetation along trail easements on the perimeters of any tract or area (and any internal area which is exposed to natural and/or flammable vegetation), with 30 feet of clearance required where natural slopes exceed 15 percent or natural and/or flammable vegetation abuts the road.

Fuel modification in areas where zones extend beyond the private property line would be assured by maintenance by a legally constituted HOA, with monitoring by the fire district.

Vegetation Management Requirements. All vegetation in all zones must be maintained annually, or more often as needed, to remove undesirable combustible vegetation or dead fuels, replace dead or dying fire-resistant plantings, eliminate ladder fuels or invasive vegetation, and control the volume of fuel to the satisfaction of the fire district. The FPP/FMP provides a list of plant materials that are considered undesirable for landscaping from a fire protection perspective due to their great potential for flammability. Some characteristics of these prohibited plant materials include dead material retention; rough or peeling bark; and the presence of oils, resins, wax, and pitch. The list is not all-inclusive but merely a sampling of plants that are strictly prohibited from use in the landscape design for the Proposed

Project. Table 4.1.3-2, Prohibited Plant Materials, provides a list of the plants prohibited in the PFF/FMP. None of these plants are incorporated into the Project landscape palette.

Additional Project Design Features. In addition to the above-mentioned restrictions and prohibitions, the FPP/FMP also offers a number of recommendations for all structures that have been incorporated as Project design measures regarding water supply/fire sprinklers, access, and fire resistant construction. These design measures contribute directly to minimization of loss, injury, or death related to wildfire and contribute to compliance with applicable fire regulations. Specific criteria address fire hydrants; fire sprinklers; road width, circulation, and grade; access gates; driveways; road/structure identification; and ignition resistant construction. Please refer to Appendix J for further details regarding these recommendations.

Based on the above-noted Project design features and considerations, impacts associated with wildland fire hazards would be **less than significant**.

Cumulative Impact Analysis

The Proposed Project would not result in significant impacts related to hazardous materials or wildland fire hazards. As with the Proposed Project, any future projects in the site vicinity noted in Table 1-13 of this EIR would be required to implement, as appropriate, similar site-specific measures to address potential impacts from hazardous materials or wildfires. Based on these requirements and the less than significant impacts associated with the Proposed Project, cumulative impacts from hazardous materials or wild fire hazards would be **less than significant**.

Mitigation

As all impacts associated with hazards were identified as less than significant, no mitigation measures are necessary.

Conclusion

An environmental site assessment and limited residue survey for the Proposed Project (GeoSoils, Inc. 2002) determined that the Project site has high concentrations of nitrate in the surface water. The presence of nitrate would result in a less than significant hazardous materials impact because the Project does not propose to use these surface waters or locally perched groundwater. In addition, the recommendations contained in the site assessment would be incorporated into the Project design to ensure that hazardous materials impacts would be less than significant. The recommendations and requirements included in the FPP/FMP have been incorporated into Project design to ensure that Project implementation would result in less than significant impacts relating to wildfire hazards.

4.1.4 Agricultural Resources

The 1983-certified EIR for the Campus Park Specific Planning Area addressed the Specific Plan area then undergoing planning as a Hewlett-Packard Research Park. That Specific Plan incorporated properties currently proposed for development under the current Proposed Project, Campus Park West plan, and Palomar College Campus Project.

The 1983 EIR in part relied on prior studies and a prior certified 1981 EIR covering the Specific Plan area (the Sycamore Springs Specific Plan EIR). The 1980 Draft EIR found that the project development would substantially alter the existing agricultural land use pattern of the area, and have significant impacts on surrounding agricultural land. The Board of Supervisors did not agree. They “determined that, due to

environmental factors, such as winter frosts and alkali buildup, combined with economic factors, which limit continued agricultural production on the site, development of the subject property would not have a significant impact on agricultural resources" (as cited in the Hewlett-Packard Draft EIR 1983:83).

At the time of Hewlett-Packard Draft EIR production in 1982, it was noted that a "large portion of the area is still used for crop production, however, most of the site lies fallow at present (1983: Enclosure A-2, 1. Agriculture; and discussed in Section IV. Environmental Analysis A. Land Use, Existing Conditions). It also was specifically noted in the EIR that agriculture was considered a compatible use during buildout of the Hewlett-Packard plan, and could continue to occur in the interim. (Note to the reader: despite the potential for continued agricultural efforts, none has occurred on site for approximately the last 25 years.) Agricultural resources and their loss due to Hewlett-Packard project-specific and cumulative projects' impacts were additionally noted in Sections VII, VII and IX of the 1983EIR. In Section VII, it was disclosed that approximately 375 acres of "prime agricultural land" (Class I and II soils) would be lost to development, as would "an additional 50 acres of agriculturally viable soils to urban development." That Draft EIR found agricultural impacts to be less than significant.

Additional summary information/clarification relating to soils designations, recent crop types, percentage of business loss compared to County-wide agricultural resources, overall County agricultural preservation efforts and policies, as well as potential impacts on adjacent agricultural areas resulting from project implementation was added to the Final EIR in the form of responses to comments (1983: Enclosure B-4). The responses were based on information provided by Tom Escher, County Department of Agriculture, and the 1981 finding of less than significant impacts to this resource was confirmed.

Of import was the response that "Despite the presence of Prime Soils, the proposed project will not impact the preservation of agricultural land in San Diego County. Because the site is virtually surrounded by proposed urban development, and is adjacent to I-15, this land is no longer regarded as prime agricultural land by the County's Department of Agriculture." It was also noted that "Other projects surrounding the site have committed additional acreages to urban development; the steeply sloped mountains to the east were regarded as a natural buffer protecting agricultural activities east of the mountains from encroaching development from the west – land on which agriculture was no longer a protected land use. For these reasons, project implementation on these rich, alluvial soils is not considered a significant impact" (1983: Enclosure A-2, 1. Agriculture).

On January 6, 1983, the Environmental Planning Section recommended to the Environmental Review Board (ERB) that the EIR be certified, with Agriculture specifically called out as being "not significant." The ERB recommended certification of the EIR and found the "Major Issue of Agriculture…Not Significant" by a vote of 4:1 (with the "1" being an ERB member who was absent). Following Planning Commission recommendation for approval, the Board of Supervisors took action on February 16, 1983, wherein the Specific plan was approved and the EIR certified, concurring with the findings and recommendations made by the ERB.

This finding is relied upon for the portions of the current proposed Campus Park Project covered under the existing Specific Plan. No additional information or changes to the on-site or surrounding land uses have occurred since 1983 that would render the parcel more appropriate for a commercial agricultural endeavor. In fact, increases in water costs and the continued development of urban land uses in surrounding areas would likely reduce the suitability of the site for commercial agriculture.

In addition to the project site addressed under the 1981 and 1983 EIRs, there is an approximately 175-acre property to the north of the adopted Specific Plan (i.e., north of Pala Mesa Heights Drive) that is included in the current Campus Park amendment that was not addressed in the prior certified EIRs. Potential agricultural impacts associated with this parcel (hereafter referred to as the northern property) and the off-

site Project improvement/traffic mitigation areas, as well as indirect effects to/from off-site agricultural uses, were not addressed in the prior documents. Each of these items is discussed below in this subsequent evaluation.

Existing Conditions

The northern property is designated as Estate Residential (17) and zoned A70. It consists primarily of open space, including approximately 128.8 acres of native Diegan costal sage scrub, 2.8 acres of native coast live oak woodland, and 38.6 acres of non-native grassland. Additional uses in the northern property include 1.2 acres of developed area (e.g., a single-family residence and several roads and trails), as well as 4.4 acres of ornamental landscaping (or "disturbed" vegetation). There are no current agricultural uses on the northern property, with such activities (as described for the Project site as a whole) last occurring in 1983.

Approximately 176 acres of mapped soils within the northern property are identified as meeting applicable criteria for the California Department of Conservation (CDC) Farmland Mapping and Monitoring Program (FMMP) *Soil Candidate Listing for Prime Farmland and Farmland of Statewide Importance* (2006). These candidate soils are used (along with other information) to identify CDC Important Farmland designations. Because the candidate soil criteria are less restrictive than those used for Important Farmlands, the candidate soil designations typically encompass additional areas.

In fact, the northern property does not contain any areas designated as Prime Farmland, Farmland of Statewide Importance or Unique Farmland under the FMMP. CDC Important Farmland designations within the northern property include approximately 0.01 acre of Farmland of Local Importance, 114.8 acres of Grazing Land, and 61.3 acres of Other Land.

Mapped CDC Important Farmland designations within the off-site Project improvement/traffic mitigation areas include approximately 1.7 acres of Prime Farmland, 6.7 acres of Unique Farmland, 3.0 acres of Farmland of Statewide Importance, 28.2 acres of Farmland of Local Importance and 2.5 acres of Grazing Land (with the remaining areas designated as either Other Land or Urban and Built-up Land).

Williamson Act lands are properties for which the owner has entered into a contract with the state not to develop with other than agricultural uses for a specified period of time. Agricultural preserve lands are lands identified by the County as appropriate for Williamson Act contract should the property owner wish to pursue it. There are no Williamson Act contract lands or agricultural preserves located within or adjacent to the northern property, or within the off-site Project improvement/traffic mitigation areas.

There are no current agricultural uses adjacent or in close proximity to the northern property, with the closest such areas comprised of mixed use orchards located approximately 1,000 feet to the southeast. Existing agricultural uses in proximity to the remainder of the Project site include citrus and mixed-use orchards to the east and south. Non-agricultural land uses in the immediate Project site vicinity include open space to the north, east and south (encompassing both native habitats and previously disturbed areas), rural residential properties to the east and south, the San Luis Rey River to the south, and major transportation corridors (i.e., I-15 to the west and SR 76 to the south). Existing land uses in more distant surrounding areas include residential development to the west and south; major transportation corridors as described above; disturbed and undisturbed open space to the north, east and south;, and agricultural uses such as citrus and mixed-use orchards in all directions, nurseries to the north, west and south; pasture/grazing areas and dryland grain farming to the east; and row/field crops to the east and west.

Current agricultural use in the proposed off-site Project improvement/traffic mitigation areas includes approximately 8.9 acres of citrus orchards and 4.9 acres of mixed-use orchards.

Guidelines for the Determination of Significance

Guidelines of Significance

Project-related impacts associated with agricultural resources are considered significant if one or more of the following guidelines is exceeded:

1. The Project would result in the loss or conversion to non-agricultural use of CDC Important Farmlands that are deemed to be agriculturally viable or the Project would result in the substantial loss or conversion to non-agricultural use of off-site CDC Important Farmlands or active agricultural operations. (CDC Important Farmlands for this analysis are defined to include Prime Farmland, Unique Farmland, Farmland of Statewide Importance, Farmland of Local Importance, and Grazing land.)

2. The Project would create a conflict with or convert Williamson Act contract lands or agricultural preserves to a non-agricultural use.

3. The Project would place or establish uses that are inconsistent with agricultural zones and/or that are in conflict with applicable ordinances, statutes, or policies related to agriculture, including: (a) the Williamson Act; (b) the County Zoning Ordinance; (c) County Board of Supervisor's Policy I-38; (d) applicable policies of the County General Plan Regional Land Use, Open Space, or Conservation Elements; and/or (e) applicable policies of the Fallbrook Community Plan.

4. The Project would involve "changes in the environment" that, due to their location or nature, could result in conversion of farmland to a non-agricultural use.

5. The Project would result in a cumulatively considerable loss of viable farmland in the San Luis Rey River region.

Guideline Sources

Significance Guideline Nos. 1 through 4 are based on the County guidelines and Appendix G of the State CEQA Guidelines, which recommend evaluating issues including conversion of CDC Important Farmlands and agricultural operations, conflicts with Williamson Act lands, conflicts with agricultural planning and zoning designations, and changes in the environment resulting in farmland conversions. Guideline No. 1 is also associated with the feasibility of potential on-site agricultural operations and the determination of whether the conversion of the Project site and off-site facility areas to non-agricultural uses would result in significant direct impacts. Guidelines No. 2 and 3 are related to potential conflicts between proposed site development and agricultural laws, regulations and policies. Guideline No. 4 entails an assessment of potential conflicts to (and from) surrounding agricultural uses, including the conversion of farmland to non-agricultural use, from effects such as air or water contamination and community pressures (e.g., in relation to agricultural-related noise or odor generation). Guideline No. 5 evaluates whether the Proposed Project would contribute to a cumulatively considerable loss of viable farmland in the San Luis Rey River region, including Important Farmlands and agricultural operations.

Analysis of Project Effects and Determination as to Significance

Substantial CDC Important Farmlands Loss or Conversion (Guideline No. 1)

As discussed above, the northern property includes 0.01 acre of Farmland of Local Importance and 114.8 acres of Grazing Land. Project-related impacts to these areas would be less than significant, based on the following considerations:

- Approximately 73.02 acres of the areas designated Grazing Land encompass sensitive biological habitats, including Diegan coastal sage scrub and coast live oak woodland. While the presence of these habitats would not preclude agricultural use per se, the environmental sensitivity of these areas would result in either restrictions on disturbance (and the corresponding loss of farmable area), or requirements for the acquisition of regulatory permits with associated mitigation and substantial expenditures (e.g., acquisition/preservation of off-site habitat areas). Accordingly, the described habitat areas are considered unavailable for agriculture and associated potential agricultural impacts from the Proposed Project would be less than significant. It should be noted that additional habitat areas in the northern property also may be subject to similar restrictions and/or mitigation requirements (i.e., 37.6 acres of non-native grassland). A total of 4.18 acres of area designated as Grazing Land consists of developed area or dirt trails. These areas are not considered appropriate for grazing, and therefore project impacts to these areas are not considered significant agricultural impacts.

- As previously described, the 1981 and 1983 EIRs concluded that because the area encompassing the southern portion of the Campus Park site "…is virtually surrounded by proposed urban development, and is adjacent to I-15, this land is no longer regarded as prime agricultural land by the County's Department of Agriculture." It was also noted that "Other projects surrounding the site have committed additional acreages to urban development; the steeply-sloped mountains to the east were regarded as a natural buffer protecting agricultural activities east of the mountains from encroaching development from the west…project implementation on these rich, alluvial soils is not considered a significant impact." Based on the immediate proximity of the northern property to the parcels so analyzed, and its consistency with the items considered (west of the mountains, and adjacency of uses committed to urban development), the cited conclusions regarding agricultural resources and related impacts also are applicable to this northern parcel.

The off-site Project improvement/traffic mitigation areas include the following approximate areas of Important Farmlands and active agricultural operations (all of which would be impacted by implementation of the Proposed Project): (1) 1.7 acres of Prime Farmland; (2) 3.0 acres of Farmland of Statewide Importance; (3) 6.7 acres of Unique Farmland; (4) 28.2 acres of Farmland of Local Importance; (5) 2.5 acres of Grazing Land; (6) 8.9 acres of citrus orchards; and (7) 4.9 acres of mixed-use (predominantly avocado) orchards. It should be noted that the described orchards overlap with several of the Important Farmland designations, with the combined impact acreage therefore less than the sum of all the noted individual acreages.

The above impacts from off-site improvement/traffic mitigation areas are considered less than significant, based on the relatively small areas involved, the location of several Important Farmland designations within (and surrounded by) urban development such as roadway intersections, and the consideration that most impacts to existing agricultural operations (orchards) would occur along the edges of such uses and would not substantially affect the viability of ongoing or future operations in adjacent areas; thus impacts would be **less than significant**.

Impacts to Williamson Act Contract Lands and Preserves (Guidelines No. 2 and 3)

As described above, there are no Williamson Act contract lands or agricultural preserves within or adjacent to the northern property, or within the off-site Project improvement/traffic mitigation areas. Accordingly, **no impacts** to these resources would occur from implementation of the Proposed Project.

Impacts Relating to Consistency with Agricultural Zones, Ordinances, Statutes and Policies (Guideline No. 3)

As discussed under Section 4.1.5, Land Use and Planning, the Proposed Project is consistent with the governing agricultural zones, ordinances, and policies. A summary of consistency with agricultural elements of the County Zoning Code, General Plan, and Board of Supervisor's Policy I-38 is presented below.

The northern parcel is designated as Estate Residential and zoned A70. The change in land use and zone to SPA and Specific Plan (S-88), respectively, would not result in the elimination of existing agricultural use, and potential future incidental agricultural activities (such as home gardens or orchards) would be allowed on areas not in open space. Based on these conditions, implementation of the Project on the northern property would comply with the proposed designation and zoning.

The General Plan Open Space Element encourages conservation by, among other things, the maintenance and/or expansion of agricultural preserves. There are no existing agricultural preserves within or adjacent to the northern parcel, or within the off-site Project improvement/traffic mitigation areas. Accordingly, the Proposed Project (including the northern property) would not be in conflict with the Open Space Element. The Conservation Element policy includes preserving existing areas with high agricultural potential and preserving existing agriculture. Because the northern property does not currently include agricultural uses, and is no longer regarded as prime agricultural land by the County's Department of Agriculture, it is not considered a parcel with high agricultural potential and non-agricultural use of the property would be consistent with the Conservation Element; impacts would be **less than significant**.

Board of Supervisor's Policy I-38 protects existing agricultural preserves. As noted under discussion for Guideline 1, there are no existing or proposed agricultural preserves or Williamson Act properties within or adjacent to the northern property, or within the off-site Project improvement/traffic mitigation areas. **No impacts** to Agricultural Preserves or Williamson Act contracts would occur and implementation of the Proposed Project (including the northern property) would be in compliance with this policy.

Indirect Impacts (Guideline No. 4)

Proposed development potentially could result in indirect impacts to or from the Proposed Project in the form of nuisance effects (e.g., odor/vector/noise generation), as well as "other changes in the existing environment" that result in the conversion of existing agricultural areas to non-agricultural use. Specifically, other changes in the existing environment (as described in Appendix G of the State CEQA Guidelines) include conditions such as potential air and water quality effects from the Proposed Project, as well as the development of land uses that may be inherently incompatible with adjacent or nearby agricultural operations (e.g., residential development adjacent to commercial agricultural uses that may generate off-site odor or noise effects). These types of indirect impacts generally are seen as potentially resulting in the short- or long-term conversion of agricultural areas to non-agricultural use through physical effects and/or community pressures.

The Project site is adjacent to a number of existing agricultural operations, including citrus and mixed used orchards to the east and south. Orchard-type agricultural uses generally are compatible with

residential and related development. Orchard crops do not generally produce strong odors and do not require year round labor, harvesting or traffic. Orchard crops are commonly located among residential areas and nuisance issues are low when compared to more intensive agricultural uses. Potential indirect impacts to off-site agricultural operations are considered less than significant based on this general compatibility. In addition, indirect impacts related to water quality and drainage issues that could affect off-site agricultural use would not be significant based on the inclusion of both short-term (construction) and long-term measures to avoid or minimize air quality, drainage and water quality effects to surrounding areas (including conformance with applicable NPDES requirements). No indirect impacts to/from agriculture resources would result in association with the off-site Project improvement/traffic mitigation areas, based on the nature of associated facilities (i.e., roadway improvements that would not generate conflicts with, or be subject to nuisance effects from, agricultural use), as well as requirements to implement air quality, drainage and water quality controls as noted above.

The County Agricultural Enterprises and Consumer Information Ordinance requires notification to prospective property buyers regarding the potential for nearby agricultural activities to exist and for those users to generate nuisances such as odor, dust, and traffic. The notice establishes the rights of farmers to farm in accordance with normal and accepted customs, even if those activities may be perceived as nuisance generating. As previously described, existing agricultural activities in close proximity to the Project site consist of citrus and mixed-use orchards, with these types of uses typically not subject to significant nuisance effects. In addition, the agricultural uses located adjacent to the proposed residential uses along the eastern Project site boundary (east of the Pala Mesa Heights Drive) are proposed to be developed for residential use in association with the pending Meadowood project. This development, if implemented, would eliminate any potential for urban agriculture interface conflicts along this eastern Project site boundary. Based on the described conditions, nuisance effects related to agriculture are not anticipated to occur at the Project site and off-site Project improvement/traffic mitigation areas, and associated potential indirect impacts would be **less than significant**.

Cumulative Impacts (Guideline No. 5)

Proposed Project development within the northern property would not make a considerable contribution and would result in **less than significant** cumulative agricultural resource impacts, based on the following reasons:

- As previously described, approximately 114.8 acres of the areas designated as Farmland of Local Importance and Grazing Land within the northern property encompass sensitive biological habitats, and would be subject to either restrictions on disturbance (and the corresponding loss of farmable area), or requirements for the acquisition of regulatory permits with associated mitigation and substantial expenditures. Accordingly, the described habitat areas are considered unavailable for agriculture and any associated agricultural impacts from development of the northern property would not contribute to cumulative effects.

- The previously referenced 1981 and 1983 EIRs concluded that the southern portion of the Campus Park site is no longer regarded as prime agricultural land, and that project implementation in this area would not result in significant agricultural impacts. Based on the location of the northern property, the listed conclusions regarding agricultural resources and related impacts are also considered applicable to this parcel. Accordingly, lack of potential future commercial agricultural use of the northern property would not constitute a considerable contribution to cumulative agricultural resource impacts.

- Potential impacts to agricultural resources from the off-site Project improvement/traffic mitigation areas would be incremental in nature, consisting of short and narrow strips of ROW

necessary for focused improvements. As such, they would not change the overall use of the parcel (i.e., require conversion of an agricultural parcel to another use) or make it more likely that the parcel would fall out of agricultural use. No considerable contribution to cumulative agricultural resource impacts would occur.

Mitigation

As all impacts associated with agriculture would be less than significant, no mitigation measures are necessary.

Conclusion

Based on the above-described significance guidelines and impact discussions, direct, indirect, or cumulative impacts were identified as less than significant in relation to the loss or conversion of agricultural resources, designations, or applicable statutes and policies from Proposed Project development (including the northern property) or the off-site Project improvement/traffic mitigation areas. Based on these conclusions, no associated mitigation measures are required or recommended.

4.1.5 Land Use and Planning

The 1981 and 1983 EIRs identified impacts to land use as less than significant with no mitigation required. The 1981 EIR noted that the project was consistent with the Fallbrook Community Plan and with existing land use designations, but that it could conflict with general provisions of the Regional Land Use Element and Regional Growth Management Plan. The previous project analyzed in the 1983 EIR was found to be consistent with the Fallbrook Community Plan for creating a good balance of land uses and encouraging light research and development of industrial uses. The project was found consistent with the goal of "preserving the area's natural amenities" through retention of freshwater marsh in the southern portion of the project site as part of a proposed recreation area. Rezoning of portions of the site would have made use regulations consistent with the proposed Hewlett-Packard facility, commercial use, and mobile-home park.

The current Project proposes land uses different from those proposed in the 1981 and 1983 documents, and plans and ordinances have either been amended or approved since certification of the previous EIRs; including the General Plan (amended in 2002), and the Fallbrook Community Plan (amended in 1988). The Fallbrook Community Guidelines also post-date the 1981 and 1983 documents. The previous EIRs also do not discuss the Interstate 15 Corridor Subregional Plan, Interstate 15/Highway 76 Interchange Master Specific Plan, RPO, Congestion Management Program, or NCCP.

The changes in the analysis due to changes in Proposed Project uses, as well as new or amended plans lead to the need for new analysis for this issue. The reader is referred to text below for a new evaluation of Project-related land use issues.

Existing Conditions

<u>Existing Setting</u>

For information regarding the existing setting, the reader is referred to the discussion in Subchapter 1.4, Environmental Setting, of this EIR.

Regulatory Framework

Land use plans, policies, and ordinances that apply to the Proposed Project are contained in the General Plan, adopted January 3, 1979, and amended April 17, 2002 (GPA 01-01), and its associated elements; Fallbrook Community Plan, adopted December 31, 1974, (GPA 74-02) and amended June 1, 1988 (GPA 88-01); Fallbrook Design Guidelines, approved April 3, 1989; Interstate 15 Corridor Subregional Plan; MSP; Zoning Ordinance (Ordinance 5281), adopted October 18, 1978 and continually revised; Park Land Dedication Ordinance; Subdivision Ordinance (effective March 22, 1979, Title 8, Division 1 of the San Diego Code of Regulatory Ordinances); LPC (Division 9, §§ 59.101 - 59.115); CMP; and NCCP. The Project is exempt from the RPO (see discussion below). These documents address a variety of issues--including development at appropriate densities and, in accordance with existing community plans, protection of steep slopes, conservation of sensitive habitats, provision of open space and recreational opportunities, protection of visual amenities, regulation of signage and lighting, and protection against incompatible land uses. Many of these issues are addressed in several elements of the General Plan and in the Community Plan. Generally, the Community Plan supplements elements of the General Plan.

County of San Diego General Plan

The General Plan Land Use Element designates planned land uses that are considered appropriate for specific areas within the County. The existing regional land use designation for the southern area of the Project site is SSA. The SSA designation is applied on an interim basis to restrict development pending completion of detailed review, study, or annexation to the County Water Authority. The northern area of the Project site is designated *Estate Development Area* (EDA), which allows low density residential and agricultural uses with lot sizes of 2 to 20 acres. The Land Use Element also describes land use designations and use regulations shown on community and subregional area maps, in this case the Fallbrook Community Plan (described below).

The Circulation Element of the General Plan (amended 1997) identifies major existing and planned roadways in the County. These roads are shown on Circulation Element maps. In the vicinity of the Campus Park Project, the following roads and their corresponding classifications are identified: SA 15 (I-15), Freeway; SR 76, Major Road; Pankey Road (from Stewart Canyon Road to SR 76; SC 2602), Light Collector; and Pala Mesa Drive (SC 150), Light Collector.

A number of additional elements also have goals and policies relating directly to the Proposed Project (detailed in Appendix A, Land Use Plans and Policies Consistency Evaluation, of the Specific Plan and General Plan Amendment Report [DDS/GA 2009]), as summarized here. The Open Space Element (amended 2002) addresses health and safety, resource conservation and recreation issues. The Land Use Element (amended 2003) addresses managed growth, promotion of rural character, preservation and management of sensitive resources, conservation, management/provision of public services, as well as the mix of houses/populations served by development. The Recreation Element (amended 2005) contains relevant policies regarding local parks, and the Scenic Highway Element (1986) addresses County scenic roadway corridors.

The Seismic Safety Element (amended 1991) focuses on objectives to minimize harm/provide emergency services in the event of a major seismic event. The Public Safety Element (2008) addresses fire and landslide issues relevant to the Project. The Noise Element (amended 2006) addresses compatibility of proposed uses with anticipated decibel levels, while the Housing Element (1999) focuses on provision of housing and support services. The Conservation Element (amended 2002) addresses wastewater, drainage/flood control, native wildlife/plants protection, soils and dark skies. The Energy Element (1997) contains policies relating to development density/minimization of transportation requirements.

The Public Facility Element (amended 2005) addresses the coordination of public facilities with new development overall. Goals and policies focus on ensuring that the service will be provided when needed and review effects of proposed development on existing services for the issues of parks and recreation, circulation (roads, levels of service and bike paths), law enforcement, animal control, schools, fire protection, wastewater treatment, potable water provision, childcare and trails (location, establishment, type and maintenance).

Fallbrook Community Plan

The Community Plan augments the General Plan and contains goals and policies specific to the community of Fallbrook. Contained within the Community Plan are the I-15 Corridor Subregional Plan with two appendices; Scenic Preservation Guidelines and the Interstate 15/Highway 76 Interchange Master Specific Plan.

The Project site is located in the easternmost portion of the Fallbrook community planning area. The Community Plan land use designation for the southern area of the site is (21) *Specific Plan Area (2.8)*, and the northern area is designated (17) *Estate Residential* (Figure 4.1.5-2, Existing Community Plan Designations). The *Specific Plan Area* designation is used where a specific plan, in this case the Campus Park Specific Plan, has been adopted. An adopted specific plan is one in which the Board of Supervisors has determined that more detailed planning is required before development can occur. Land within this designation typically has environmental constraints or unique land use issues that require special land use and/or design controls. No major or minor tentative subdivision maps or reclassifications to more intensive zones can be approved except in accordance with the adopted plan. The (2.8) suffix indicates a maximum overall density of 2.8 DU/ac within the specific plan.

The *Estate Residential* designation provides for low-density residential and minor agricultural uses. Parcel sizes of two or four gross acres or larger are allowed depending on the average slope gradient. Clustering is permitted within this designation. The minimum parcel size and maximum number of DUs in a clustered development is governed by the applicable regional land use category.

Each community/subregional plan in San Diego County identifies specific community character attributes and outlines goals and policies intended to preserve those attributes. The Fallbrook Community Plan does not contain a community character element, but addresses community character in the Fallbrook Goals section of the Community Plan. The General Goal identifies Fallbrook as having a unique village atmosphere characterized by predominantly low-density residential development and agricultural uses. The County's goal is to "perpetuate the existing rural charm and village atmosphere while accommodating growth in such a manner that it will complement the environment of Fallbrook." The Community Plan discusses business, residential, schools, floodplains and open space, public utilities, parks and recreation and community beautification and design goals and policies. Circulation Element policies relate to efficient circulation, parking, bus use and trails/pathways.

Fallbrook Design Guidelines

The Fallbrook Design Guidelines apply to all development projects within the Fallbrook Community Plan area, with additional guidelines pertaining to commercial, industrial, and multi-family residential developments. The Fallbrook Design Guidelines include objectives and guidelines to ensure that new development in Fallbrook is designed and built with a consideration of community context, a strong emphasis on quality, sensitivity to the landscape and respect for the community's Design Objectives. The Guidelines contain direction on site planning; landform alteration; landscaping; walls, fences and berms; parking and circulation; lighting; non-motorized circulation; architecture and signage.

Interstate 15 Corridor Subregional Plan

The Subregional Plan area extends along the I-15 corridor from approximately 20 miles north of the Escondido city limits to the Riverside County line, and includes the viewshed area on either side of the freeway. The Subregional Plan encompasses approximately 12,600 acres and passes through five planning areas within the County: North County Metropolitan, Bonsall, Valley Center, Fallbrook, and Rainbow. The Subregional Plan does not replace these community plans, but rather is implemented through amendments to the community plans, as appropriate. The Subregional Plan calls for the preservation of the scenic attributes of the I-15 corridor and establishes Scenic Preservation Guidelines applicable for development within the I-15 corridor. In addition, a Special Area Designator "B," Community Design Review Area, is applied to the zones of all property within the I-15 corridor.

Interstate 15/Highway 76 Interchange Master Specific Plan

The County Board of Supervisors approved the MSP on June 1, 1988, to implement the I-15 Corridor Subregional Plan. The MSP area encompasses approximately 1,178 acres of land located within the four quadrants of the I-15/SR 76 interchange. The southern area of the Project site is located within the MSP area and is identified as Hewlett-Packard "Campus Park" (Areas B and C of Specific Plan 83-01). Because of its location at the intersection of an interstate highway and a major state highway, the MSP envisions this area as a logical node for future development. The MSP states that:

> The principal land use components of the proposed plan include the adopted Campus Park/Hewlett Packard industrial/research park Specific Plan to convert approximately 100 acres of mobile home park to an industrial/research park use (with a similar type of development as proposed on the Hewlett-Packard Park ownership) or to retain it for residential uses. Also proposed are residential areas to meet some of the anticipated housing needs of the community and the industrial park, supporting neighborhood commercial areas, parks, trails and open space.

The MSP calls for an overall residential density of 0.81 DU/ac based on the total acreage within the MSP area, with a maximum of 956 DU for the entire MSP area. The minimum allowable parcel size is 15,000 s.f. on land with slopes of less than 15 percent. According to the MSP, the area does not have the necessary service, utility, and road infrastructure to support the entire proposed plan. Therefore, a final land use plan cannot be adopted until further studies are conducted to detail both the specific needs of the plan area and appropriate methods to support those needs.

Due to the service concerns noted above, the MSP calls for the designation of the interim zone S90 - *Holding Area* for the MSP area until the necessary supporting technical studies are conducted and the County Board of Supervisors adopts final zoning and the MSP. The S90 zone is intended to prevent isolated or premature land uses from occurring on lands for which adequate public services and utilities are unavailable, or for which the determination of the appropriate zoning regulations is precluded by contemplated or adopted planning proposals; or by lack of economic, demographic, geographic or other data. It is intended that the S90 designation will be replaced by other use regulations when the aforementioned conditions no longer exist. The uses permitted are community services, interim uses, or uses that would not prematurely commit the land to a particular use or intensity of development. Until the Board of Supervisors adopts the MSP, and the land contained therein is appropriately zoned to implement the MSP land uses, only the land uses allowed in the S90 zone, as defined in Sections 2900-2908 in the Zoning Ordinance, would be allowed, with a minimum lot size of 20 acres.

The entire MSP area is designated with a regional category of SSA, as described above, on an interim basis to restrict development pending completion of the required studies, including a river plan, traffic

study, facilities financing plan, phasing plan, market analysis, dark sky policy, design guidelines, and a park/open space and trails study.

The MSP anticipates that a specific plan will be prepared for the Hewlett-Packard Campus Park (the southern area of the Project site), with 83 acres designated for an industrial research park and associated parking, and 10.5 acres designated for neighborhood commercial.

Campus Park Specific Plan

The adopted Campus Park Specific Plan (1983) encompasses the southern area of the Project site, as well as the adjacent Palomar College site and Campus Park West property (Figure 4.1.5-3, Campus Park Specific Plan Land Use).

Within the combined Campus Park and Palomar College area, the adopted Campus Park Specific Plan would allow development of 2.5 million square feet of industrial research park in buildings up to 50 feet tall, parking for 5,500 cars, a pond, community trails, and a variety of recreational amenities for use by employees. Riparian habitat in the extreme southern portion of the site would be preserved; however, portions of the southern riparian forest would be impacted by the development of recreational facilities. Primary internal access would be along Pankey Road, which would extend from its current northern terminus (southern extension) north along the western property boundary to connect to the current northern extension of Pankey Road.

The approved Campus Park Specific Plan also includes the residential development of 336 manufactured homes and a 150-unit condominium project in the Campus Park West property. An irregularly shaped area to the south of SR 76 was planned for commercial use.

County of San Diego Zoning Ordinance

The Zoning Ordinance identifies the permitted uses on the Project site, consistent with the land use designations of the General Plan and Community Plan. The Project site currently has two zoning designations. The northern area of the Project site has a zoning classification of A70 - Limited Agriculture. The A70 zone is intended to create and preserve areas intended primarily for agricultural crop production. Typically, the zone classification is applied to protect moderate- to high-quality agricultural land. Permitted uses include agricultural, residential, and essential services. Minimum lot size within the A70 zone is 2.0 acres. The southern area of the Project site is zoned S90 - Holding Area. As previously described, this is an interim zone intended to prevent premature development from occurring in areas that do not have adequate public services and facilities or because the determination of appropriate zoning regulations is precluded by planning proposals or by a lack of geographic demographic, economic, or other information. Minimum lot size within the S90 zone is 2.0 acres.

The Project site is located within the I-15 Corridor Subregional Plan area and thus is designated with a Special Area Designator of “B,” Community Design Review Area, in both the A70 and S90 zones. The Proposed Project is subject to the Community Design Review Area Regulations contained in Section 5750 *et seq.* of the County Zoning Ordinance, which are intended to maintain and enhance the community’s individual character and identity.

County of San Diego Park Land Dedication Ordinance

The Park Land Dedication Ordinance is the mechanism that enables the funding or dedication of local parkland. The ordinance establishes several methods by which developers may satisfy their park

requirements including payment of park fees, dedication of a public park, provision of private recreational facilities, or a combination of these methods.

County of San Diego Subdivision Ordinance

The County Subdivision Ordinance sets forth development standards for the subdivision of land with respect to design, dedication and access, and required improvements. Applicable standards for the Proposed Project include several design regulations associated with lot size, orientation, and configuration.

County of San Diego Resource Protection Ordinance

The RPO provides development controls for unique topography, ecosystems, and natural characteristics within the County deemed to be fragile, irreplaceable, and vital to the general welfare of the County's residents. On-site resources addressed by the RPO include wetlands, wetland buffers, floodplains, steep slopes, sensitive lands, and prehistoric and historic sites.

On July 23, 2004, the San Diego County Planning Commission granted an RPO exemption for the Campus Park development and adjacent Pappas Specific Plan Area (PC7-23\RPO-Exemption). The exemption was granted because these developments met the conditions of the RPO, which exempts all or any portion of a Specific Plan Area that has at least one Tentative Map or Tentative Parcel Map approved prior to August 10, 1988, subject to specific findings made by the Planning Commission, or (on appeal) the Board of Supervisors, at a public meeting.

County of San Diego Light Pollution Code

The LPC is a County regulatory ordinance that restricts the use of outdoor lighting that emits undesirable light rays into the night sky. Conformance with this ordinance was addressed during preparation of the Project Initial Study, and is not further addressed in this subchapter. The reader is referred to Section 4.2.1 of this EIR for details from the Initial Study.

Congestion Management Program

The CMP, as adopted by SANDAG, requires enhanced CEQA review for projects that generate 2,400 or more ADT, 200 or more peak hour trips, or 50 or more peak hour trips on freeway segments. Projects meeting these criteria must be evaluated in accordance with the requirements of the Regional CMP. The CMP analysis must include traffic LOS impacts on affected freeways and Regionally Significant Arterial systems, including all designated CMP roadways. The traffic study conducted for the Project (Appendix C) concluded that the Project would exceed the ADT and peak hour freeway trips thresholds requiring enhanced CEQA analysis. Therefore, preparation of a CMP analysis, consistent with the CMP, was required for the Project and is addressed in Subchapter 2.2, Transportation/Traffic.

Natural Community Conservation Planning Program

Regional conservation planning strategies under the California Endangered Species Act (ESA) that provide protection, preservation, and conservation of listed and candidate species, their habitats, natural communities, and natural resources, while continuing to allow appropriate development and growth within the state, are authorized and implemented under the NCCP Act of 1991. These strategies are designed to allow for growth as well as provide protection and conservation to threatened and endangered species through multi-species, habitat-based, and long-term approaches that ensure both the conservation of, and net benefits to, the affected species. Under this program, the USFWS, CDFG, and other

stakeholders have evaluated, or are evaluating, the distribution and extent of sensitive habitats and target sensitive plant and animal species in California. The ultimate goal of these studies is to develop interconnected ecosystem open space. Development and implementation of regional multi-species open space systems is intended to protect viable populations of key sensitive plant and animal species and their habitat while accommodating continued economic development and quality of life for residents of the region.

The County adopted an MSCP for a portion of the County on March 18, 1997, to meet the requirements of the NCCP Act of 1991 and the federal and California ESAs. An MSCP is a comprehensive, long-term habitat conservation plan that addresses the needs of multiple species by identifying key areas for preservation as open space in order to link core biological areas into a regional wildlife preserve. The total MSCP study area encompasses 582,243 acres, of which 43 percent (252,132 acres) is in the unincorporated areas of San Diego County. Although the Project site is within the unincorporated area of the County, Campus Park lies outside the boundaries of the currently adopted MSCP. It is, however, within the boundary for the proposed North County segment of the MSCP, and the Project site contains proposed hardline preserve on the Draft North County MSCP map, although the hardline has not yet been approved by the resource agencies. Refer to Subchapter 3.3, Biological Resources, for additional information on the MSCP and the North County Subarea.

Guidelines for the Determination of Significance

Guidelines of Significance

A significant land use/community character impact would occur if the Proposed Project would:

1. Conflict with the land use goals, objectives, policies and recommendations of the adopted Campus Park Specific Plan; Subregional Plan; MSP and other sections of the Community Plan; General Plan; Zoning Ordinance; and any other applicable plans, policies, ordinances, guidelines or regulations.

2. Conflict with the established community character, as defined by the Community Plan and Fallbrook Design Guidelines. Determination of significant effects to community character is derived from evaluating and comparing the introduced development to the existing community character of the area. If the proposed land uses conflict with the nature and character of the existing setting of the community, a significant impact would be anticipated.

3. Physically divide an established community.

Guideline Sources

The land use guidelines are based on Appendix G of the CEQA Guidelines and County staff guidance. Significance Guidelines No. 1, 2, and 3 are intended to ensure conformance with existing regional and local planning efforts, as well as to maintain and enhance the character, structure, and dynamics of established communities in the Project vicinity. Consideration is also given to the Land Use Element of the General Plan and the Fallbrook Community Plan, particularly applicable sections of the I-15 Corridor Scenic Preservation Guidelines, the Fallbrook Design Guidelines, and the MSP.

Analysis of Project Effects and Determination as to Significance

This land use analysis focuses on existing and proposed land use and zoning, consistency with the General Plan and community/regional plan goals and policies, and conformance with environmental plans. The analysis includes a discussion of the General Plan and an analysis of the proposed General

Plan Amendment and the Specific Plan Amendment in relation to the existing General Plan, the Fallbrook Community Plan, and the Fallbrook Design Guidelines.

A discussion and map (Figure 4.1.5-1) of existing land uses within and surrounding the Project site are included. The key components of the community character analysis focus on goals and policies of the general and community plans, an analysis of potential impacts associated with intensification of the site, and the potential for subsequent changes to properties in the vicinity that could be encouraged by the newly proposed community. The discussion identifies existing parks and trails in the vicinity of the Proposed Project and describes the proposed on-site park, trail, and open space areas.

Potential Impacts Associated with the Goals, Objectives, Policies, and Recommendations of Applicable Land Use Plans, Ordinances, and Policies (Guideline No. 1)

The Proposed Project includes a SPA (SPA 03-04), GPA (GPA 03-04), and Rezone (R 03-014), among other discretionary approvals necessary for Project implementation. The proposed SPA would change the land use design and development densities allowed under the existing Campus Park Specific Plan (SP-83-01) and change the Specific Plan area to include the northern area parcel and exclude the Campus Park West and Palomar College areas. The proposed GPA would modify land use designations and densities in the Land Use Element, modify the circulation plan in the Circulation Element, as well as modify text and maps within the Community Plan and Subregional Plan. The proposed Rezone would change existing zoning designations from A70 (northern area) and S90 (southern area) to S88—*Specific Planning Area*.

Appendix A, Land Use Plans and Policies Consistency Evaluation, of the Specific Plan and General Plan Amendment Report (DDS/GA 2009) includes a listing of applicable goals and policies of the General Plan and Community Plan, the Fallbrook Design Guidelines, Subregional Plan and MSP, as well as an analysis of the Project's consistency with those goals and policies. Discussion of plan conformity is summarized below for each document/ordinance.

Campus Park Specific Plan

The original Campus Park Specific Plan area encompassed the southern area (241 acres) of the current Project site, the area that is now called Campus Park West, the future Palomar College site, and a small, irregular-shaped area south of SR 76 (Figure 4.1.5-3). Proposed land uses of the original Campus Park Specific Plan included the Hewlett-Packard research/ development campus and a recreation/open space area on the current Project site (Lot B), a mobile home park and condominium development on the Campus Park West property (Lots A and D), and general commercial in the area to the south of SR 76 (Lot C). To facilitate the currently proposed Campus Park Project, the original Campus Park Specific Plan would be amended to revise the proposed land uses on Lot B to single-family and multi-family residential, office professional, Town Center, recreation, and open space, and to add the northern property previously identified as the "Heald" parcel to the Project site.

As indicated, the Project as currently proposed is not consistent with the existing Campus Park Specific Plan and a SPA is part of the Project application. Adoption of the SPA by the County Board of Supervisors would render the Proposed Project consistent with Specific Plan uses and development guidelines. Impacts would be **less than significant**.

County of San Diego General Plan Land Use Element

The Project site currently has designated regional land use categories of SSA (southern area) and EDA (northern area). These regional land use categories would not allow for the development of Campus Park

as currently proposed. The EDA discussion in the General Plan defines dwelling unit densities based on the average slope of the project area and defers to the community plan maps (in this case the Fallbrook Community Plan) with respect to allowable maximum densities. In addition, while lot consolidation is allowed within the EDA, clustered parcels cannot be less than one acre.

Existing land use designations are (21) *Specific Plan Area (2.8)* for the 239.4-acre southern area and (17) *Estate Residential* for the northern area. The *Specific Plan Area* designation allows 2.8 dwelling unit/acre, or a total of 670 dwelling units in the southern area. A total of 830 dwelling units are proposed in this area. The *Estate Residential* designation in the northern area allows a total of 1 DU/2 ac if slopes are less than 25 percent, or 1 DU/4 ac if slopes are greater than 25 percent. In this area, 99.6 acres have slopes with gradients less than 25 percent and 76.7 acres have slopes with gradients greater than 25 percent. The total number of dwelling units allowed within the northern area of the Project site, therefore, would be approximately 69 units; 248 single-family dwelling units are proposed. Thus, proposed residential densities in the southern and northern areas of the Project site are not consistent with the density allowed under the existing land use categories. In addition, the *Estate Residential* designation requires minimum lot sizes of two acres. Proposed lot sizes within the northern area would be 4,500 to 5,000 s.f. (0.10 to 0.11 acre). The Project, however, includes an application for a GPA to re-designate the entire 416-acre site with a land use designation of *Specific Plan Area* (3.0) (LU-1). The *Specific Plan Area* (3.0*)* designation would allow a maximum of 1,500 dwelling units and smaller residential lot sizes consistent with the Proposed Project.

The Proposed Project includes a General Plan Land Use designation change from EDA to Current Urban Development Area (CUDA), which would permit parcels less than one acre in size, thereby increasing overall density. In order that the Proposed Project can be found to be consistent with the Regional Land Use Element of the County General Plan, the Proposed Project is seeking a GPA that would accomplish the necessary change of County land use designation from EDA to CUDA for the 416.1-acre site. Adoption of the GPA by the Board of Supervisors would render the Proposed Project consistent with the General Plan land use designations. Accordingly, impacts associated with General Plan (in)consistency would be avoided and therefore **less than significant**.

County of San Diego Circulation Element

The existing Circulation Element Map shows Pankey Road (SC 2602) traversing the Project site in a north-south direction in the western portion of the site and Pala Mesa Drive (SC 150) connecting with Pankey Road (SC 2602) at the southwestern Project site boundary. The Proposed Project's circulation plan would relocate the on-site segment of Pankey Road (SC 2602) between Stewart Canyon Road and SR 76 to the east, into the proposed alignment of Horse Ranch Creek Road, and creating a new intersection approximately 1,400 feet east of existing Pankey Road (Figures 1-20 and 1-21). Pala Mesa Drive would extend to the southeast from the bridge spanning I-15 and would connect to existing Pankey Road (to be renamed Pala Mesa Drive), then connecting to SR 76 at the SR 76 intersection with existing Pankey Road. Pankey Place would extend east from Pala Mesa Drive to Horse Ranch Creek Road. Although the circulation pattern would be similar to that shown in the Circulation Element, the specific alignments would differ slightly and therefore would be inconsistent with design specifics of the Circulation Element. In order for the Proposed Project to be found consistent with the County General Plan Circulation Element, the Proposed Project proposes a GPA to amend the Circulation Element to relocate Pankey Road with the proposed alignment of Horse Ranch Creek Road, extend Pala Mesa Drive to SR 76, and provide Pankey Place as a connection between Horse Ranch Creek Road and Pala Mesa Drive. Adoption of the GPA (among other actions) by the Board of Supervisors would render the Proposed Project consistent with the CE classifications. Accordingly, associated impacts would be avoided and therefore **less than significant** (pursuant to Guideline No. 1).

Other Elements

With the exception of the Circulation Element, for which the Proposed Project is seeking amendment, as noted above, the Project would be consistent with applicable General Plan Element standards addressed in this document. The Project would conform with each of the goals and policies addressed in Appendix A, Land Use Plans and Policies Consistency Evaluation, of the Specific Plan and General Plan Amendment Report (DDS/GA 2009) with regard to Open Space, Land Use, Recreation, Scenic Highways, Public Safety, Noise, Housing, Conservation and Public Facility. The reader is referred to the appendix of the of the Specific Plan and General Plan Amendment Report for detail, as well as to Chapter 1.0 for additional Project description specifications, and to Subchapters 2.1, 3.1, and 3.3/Sections 4.1.2, 4.1.3, and 4.1.6 for additional and supporting information regarding aesthetics, noise, biological resources, hydrology and water quality, hazards, and utilities and service systems/public services. Accordingly, associated impacts would be avoided and therefore **less than significant** (pursuant to Guideline No. 1).

Fallbrook Community Plan

As described above, the Proposed Project would be inconsistent with the 1983 Campus Park Specific Plan and the General Plan land use categories, both of which are incorporated into the Fallbrook Community Plan. The Project applications for the SPA and GPA to change the land use designations from (21) Specific Plan Area (2.8) and (17) Estate Residential to (21) Specific Plan Area (2.7) would also resolve this inconsistency, as discussed above. Land use impacts would be avoided and therefore **less than significant** pursuant to Guideline No. 1.

Fallbrook Design Guidelines

The Proposed Project would be consistent with the General Guidelines, Commercial Guidelines, and Special Environmental Consideration Guidelines that apply to the Project, as detailed in Table 2.1-2. Land use impacts are identified as **less than significant** pursuant to Guideline No. 1.

Interstate-15 Corridor Subregional Plan

The Project site is located within the I-15 Corridor Subregional Plan area and has a Special Area Designator "B," Community Design Review Area. Pursuant to the I-15 Corridor Subregional Plan, the Project is subject to the Scenic Preservation Guidelines contained within the I-15 Corridor Subregional Plan. The Proposed Project would be consistent with applicable detailed Scenic Preservation guidelines (see Appendix A, Land Use Plans and Policies Consistency Evaluation, of the Specific Plan and General Plan Amendment Report [DDS/GA 2009]). Land use conformity impacts would be **less than significant**.

I-15/Highway 76 Interchange Master Specific Plan

As noted above, the Regional Land Use Element of the County General Plan now designates the entire MSP as SSA to ensure completion of recommended studies to identify both the needs of the area and appropriate methods to address those needs. As detailed in Appendix A, Land Use Plans and Policies Consistency Evaluation, of the Specific Plan and General Plan Amendment Report (DDS/GA 2009) under the discussion on the MSP, the MSP required master detailed studies for eight issues. Some of these have been addressed through overall plans or regulations already completed (e.g., the San Luis Rey River Plan or LPC). Others have been completed as part of the Meadowood Specific Plan/GPA Report. These master studies are relevant to the Campus Park Project area. The requirements of the MSP would be met upon approval of the Meadowood completed master studies and adoption of the Proposed Project for the parcels covered within Project boundaries (Project-specific studies which are consistent with the

above-noted master studies related to phasing, facilities financing, traffic, and park/open space trails). Land use impacts are identified as **less than significant**.

County of San Diego Zoning Ordinance

The Proposed Project would be consistent with the Community Design Review Area Regulations contained in the County Zoning Ordinance. The reader is referred to Section III.E of the Campus Park Specific Plan/General Plan Amendment Report. Compliance with these regulations is required due to the Project site's designation of Special Area Designator "B." No associated significant land use impacts would occur.

The northern area of the Project site is zoned A70 - Limited Agricultural, and the southern area of the Project site is zoned S90 - *Holding Area*. While residential development is a permitted use within the A70 and S90 zones, the allowable maximum densities must be in conformance with the zoning designations, which are consistent with the land use designations of the General Plan and Community Plan. Under the existing zoning, the maximum allowable number of dwelling units would be based on a minimum lot size of two acres. The Proposed Project would develop 1,076 dwelling units with minimum lot sizes of 4,000 s.f. (0.09 acre) for single-family homes. In order for the Project to be found consistent with the County Zoning Ordinance, the Project includes an application for a Rezone, which would rezone the entire site as S88 – *Specific Planning Area*. The S88 zone is intended to accommodate Specific Plan areas and would allow an unlimited variety of land uses. Upon approval by the Board of Supervisors, the Proposed Project would accomplish the necessary change and impacts would be **less than significant** pursuant to Guideline No. 1.

County of San Diego Park Land Dedication Ordinance

The Proposed Project would dedicate 8.5 acres for an active sports park adjacent to the east side of Horse Ranch Creek Road, which would include multi-purpose playing fields. Two neighborhood parks totaling 0.6 acre are proposed within the northern single-family area. The Proposed Project also would provide a 1.2-acre private recreational facility with a swimming pool, lounge area, and recreational hall. As such, the Project would meet the requirements set forth by the Park Land Dedication Ordinance for adequate parkland dedication and land use impacts to County parks as a result of Project implementation would be **less than significant**.

County of San Diego Subdivision Ordinance

The Project site has been designed such that it would be consistent with all requirements of the Subdivision Ordinance, upon approval of the Specific Plan Amendment. **No impact** is identified.

Natural Community Conservation Planning Program

As noted above, the MSCP implements the NCCP in a portion of the unincorporated lands of San Diego County. While the Project site is not located within the adopted MSCP area for North County, the Project site is mapped as a hardline preserve in the Draft North County MSCP map. It is likely that the North County MSCP may be approved prior to approval of the Project; therefore, a hardline approval for coastal sage habitat has been sought by the Project Applicant, who has initiated discussions with the County, as well as with the USFWS and CDFG. The current Project design incorporates the agreed-upon hard line open space, which includes all on-site areas beyond proposed grading and fuel management zone limits. Such designation would allow for take authorization for listed species within the Project's impacted areas with no further approvals necessary from the resource agencies as they relate to the NCCP process. The hardline agreement between the applicant, County, and resource agencies would incorporate the

mitigation and protection measures for impacted biological resources. Mitigation measures listed in Subsection 3.3.5 of this EIR include a Resource Management Plan outlining the management tasks to be conducted to preserve the proposed open space in perpetuity. Tasks include maintenance, management, sensitive species surveys, and funding. The Project would comply with the NCCP, as required (refer to Subchapter 3.3, Biological Resources, for additional details). Land use impacts related to program non-conformity would be **less than significant**.

Congestion Management Program

As previously noted, the Traffic Impact Study completed for the Project (Appendix C) concluded that the Project would exceed CMP trigger thresholds for the ADT and street segment peak hour trips, as well as exceed the thresholds relating to freeway segment peak hour trips. Therefore, Project studies were completed in conformance with requirements for enhanced CEQA review. This enhanced review focused on regional freeways I-15 and SR 76 and concluded that the CMP LOS standard would not be met without the Proposed Project. Refer to Subchapter 2.2 of this EIR for additional information on potential impacts and mitigation measures. With regard to land use, **no impact** is identified.

<u>Potential Conflicts with Established Community Character, as defined by the Fallbrook Community Plan and Fallbrook Design Guidelines (Guideline No. 2)</u>

Community character/land use compatibility can be defined as those features of a neighborhood or community that give it an individual identity, as well as the unique or significant resources that comprise the larger community. Community character/land use compatibility are also functions of the existing land uses and natural environmental features based on a sense of space and boundaries, physical characteristics (e.g., geographic setting, presence of unique natural and man-made features, ambient noise, air quality, etc.), and qualitative psychological responses held in common (e.g., “rural,” “friendly”).

Determination of a proposed project’s effect on existing community character is derived from evaluating and comparing the introduced development to the existing community character of the area. If the proposed land uses conflict with the nature and character of the existing setting of the community, a significant impact would be anticipated. Evaluation of potential community character impacts is based on Project consistency with applicable goals and policies in relevant planning documents because these documents reflect the community’s prioritization of what is important—to retain, improve or change. Specific goals, policies and standards of these two plans that are relevant to the Proposed Project are detailed and discussed in Appendix A, Land Use Plans and Policies Consistency Evaluation, of the Specific Plan and General Plan Amendment Report (DDS/GA 2009), and the Project is found consistent/conforming to their standards. The reader is referred to the appendix of the Specific Plan and General Plan Amendment Report for specifics. Conclusions based on those details are provided below.

The existing community within the Project vicinity generally is comprised of large-lot residential development and agricultural activities, although higher-density residential development, particularly Lake Rancho Viejo, is located in the vicinity. More specifically, the Project site is located adjacent to I-15, which is a major freeway trending north to south, connecting urban areas in San Diego and Riverside counties. SR 76, a California state highway, is located adjacent to the southern Project boundary. The area serves as an interface between the more urban freeway areas and the less populated, rural areas to the east. Land uses to the west include vacant land (planned future Palomar College); I-15; the Pala Mesa Country Club Golf Resort with golf course, restaurant, and guestrooms; avocado groves; single-family residences; and undeveloped land. Undeveloped land and large-lot residences with scattered avocado groves are located to the north and northeast, as is the Monserate Mountain Preserve. The Meadowood Specific Plan Area, which currently contains citrus and avocado groves, is located to the east. The Campus Park West parcel lies adjacent to the southwestern site boundary and currently consists

of a radio-controlled model aircraft facility and undeveloped land. Land uses to the south of the Project site include citrus groves, the San Luis Rey River, and the previously mentioned Lake Rancho Viejo single-family residential subdivision (Figure 4.1.5-1). Excluding the northern section, the Campus Park, Campus Park West, Meadowood and Palomar College properties are all components of an area planned by the community for development under the I-15/Highway 76 Interchange MSP.

The Proposed Project would provide a higher residential density, as well as localized commercial and office professional uses, in a suburban setting. Such development would constitute an intensification of land uses that could be perceived as detracting from the rural community character of the Community Plan area. While the Project would construct a consolidated residential development with commercial and office professional uses in a generally rural setting, large areas of open space would be preserved to retain the rural character. Depending upon the wastewater management option chosen, the Project would dedicate 173.2 to 175.8 acres as open space preserve and an additional 27.7 acres as community open space areas, resulting in a total of 42 percent of the Project site as open space. The Project also would provide 11.9 acres of parks and recreational facilities, and an integrated multi-purpose trail system to accommodate active and passive recreation areas, as well as access to hiking, bicycling, and horseback riding. Provision of these features within a consolidated development would maintain rural pursuits.

The Proposed Project has been designed in a "village" format, whereby the natural character of the site and surroundings provided both constraints and opportunities for the Proposed Project design. Higher density housing has been sited adjacent to the Town Center. Lower density residential housing would be sited in the northern and central portions of the Project site, further from the core and adjacent to existing off-site residential development. Architectural and landscaping guidelines contained in the Campus Park Specific Plan and General Plan Amendment Report and depicted in Chapter 1.0 of this EIR provide general design criteria. Location on the flatter portions of the site, as well as extensive Project landscaping along Project perimeter roads, would contribute to visual minimization of the development (the reader is referred to Subchapter 2.1, Aesthetics, of this EIR for additional detailed discussion).

In addition, while the Project site is located in rural Fallbrook Community Plan area, this portion of the Community Plan area along the I-15 corridor is transitioning to more intense uses by design. This is clearly expected and planned for by the community through the incorporation of the I-15 development plans into the Fallbrook Community Plan. Several existing and planned consolidated small-lot residential developments are located within the Project vicinity. Existing small-lot residential developments include the Lake Rancho Viejo development to the south and two other residential developments on the west side of the I-15. Planned developments include Campus Park West, located immediately to the southwest, Palomar College immediately to the west, and Meadowood to the immediate east. Campus Park West is planned for mixed-use development (single- and multi-family residential, commercial, potential wastewater treatment plant, a civic use, and office professional). Palomar College would be a community college ultimately serving approximately 12,000 students. Meadowood would be developed with single- and multi-family residences (844 DUs), parks, and an elementary school.

Given that the Proposed Project development would not be located along a ridgeline (skylined), would retain large areas of natural habitat, would provide substantial vegetative screening, and is consistent with location and development intensity proposed in the area Community Plan, **less than significant** impacts to community character are identified pursuant to Guideline No. 2.

<u>Potential Impacts Associated with Physically Dividing a Community (Guideline No. 3)</u>

The Project would be developed on land that is presently undeveloped and adjacent to and accessible via two major highways, I-15 and SR 76. Only one occupied residence is located on the Project site, and the Project site does not currently provide access to community uses to surrounding residents. No services

(schools, shopping, churches, etc.) are provided in the immediate area that could be bisected. The Project, through the proposed SPA, would create a semi-rural residential community with semi-rural design references and commercial and office professional uses. Proposed facilities would include local parks, trails, and a Town Center, which would provide a point of cohesion and a place for surrounding residents to gather. For these reasons, effects associated with physically dividing an established community would not occur, and **no impact** is assessed.

Cumulative Impact Analysis

Significant cumulative land use and planning impacts occur as a result of the combination of Project effects which, when examined individually, or in a vacuum without other projects considered, may not be identified as significant. All of the projects listed in Table 1-15 were included in review of the potential for significant cumulative land use impacts. As noted in Table 1-14, two projects under review at the County in addition to the Proposed Project include GPAs (Campus Park West and Meadowood). Particular attention was given to those projects that include GPAs that may, in combination with the Project, contribute to increased land use density not envisioned in the General Plan or Community Plan. In addition, a Palomar College Campus Project is underway immediately west of the Proposed Project, as noted above in this section. Construction of these various residential, educational and commercial/industrial projects are anticipated to increase the urban intensity of the area, which may not be in conformance with the land use designations, policies and goals of the General Plan, Community Plan, Subregional Plan, MSP, and Zoning Ordinance, and may alter the overall community character and land use compatibility of the area over the long term.

As shown on Table 1-15, for the Proposed Project and all other cumulative projects, a total of approximately 5,097 residences, as well as various commercial, office professional, and educational developments would be constructed. Approval of the three GPA projects alone (i.e., the Proposed Project, Campus Park West, and Meadowood) would result in a total of 2,323 residential DUs (approximately 46 percent of the total cumulative residential units), as well as all of the office professional uses, and potentially would result in a significant cumulative impact to the existing land use densities and character of the area. These cumulative projects would result in significant changes in the community character (as demonstrated through by its visual character) of the areas east of I-15. This change in the seen environment is expressly addressed in the cumulative impacts discussion of Subchapter 2.1, Aesthetics. Assessing significant cumulative effects to the same criteria here would be duplicative. The reader is therefore referred to Subchapter 2.1, Section 2.1.4 of this EIR.

With regard to land use consistency, approval of the Project and the other two GPA projects under the jurisdiction of the County, in conjunction with their related amendments would resolve any inconsistencies and achieve conformity with land use designations, goals and policies of the General Plan, Community Plan, Zoning Ordinance, and Subdivision Ordinance. As discussed above, the Project also would be consistent with all other relevant land use plans and policies. Based on this, the Project would be consistent with all applicable land use and planning requirements and would not significantly contribute to related cumulative impacts in association with the projects listed in Table 1-14. Similarly, any potential changes in community character also would be consistent with planning documents for the area. Therefore, the Project would not result in a cumulatively considerable land use effect and potential impacts related to document conformity/inconsistency, including for the issue of community character would be **less than significant**. Again, the reader is referred to Section 2.1.4 of Subchapter 2.1, however, for discussion of cumulative visual effects related to community character.

Mitigation

Potentially significant land use conformance issues discussed above would be addressed through implementation of Project design elements. No mitigation is required.

Conclusion

The Project would be inconsistent with existing goals and policies in the Land Use Element of the General Plan, the Circulation Element of the General Plan, and the Community Plan. The Project also would be inconsistent with the Zoning Ordinance. If the Project is approved, each of these inconsistencies would be resolved during Board of Supervisors action on the Project as the Project application includes amendments to the General Plan, Specific Plan, and Zoning Ordinance. Potential effects related to community character were identified as less than significant. No land use impacts related to physical community division would occur. Finally, there would be no cumulatively considerable land use impacts as a result of Project development.

4.1.6 Utilities and Service Systems/Public Services

The 1981 and 1983 EIRs identified public service impacts as significant but mitigable. The 1981 EIR found impacts to police, water, and wastewater disposal as significant but mitigable, and covered impacts to energy supply, fire protection, schools, health care, solid waste and private utilities under Effects Found Not to Be Significant. The 1981 EIR discussed annexation for water and wastewater into either the RMWD or the San Luis Rey Mutual Water District. The use of well water or recycled water was discussed. The uses of recycled water for irrigation or construction of a package WTP on site were noted as possible mitigation measures for wastewater disposal impacts.

The 1983 EIR required the Applicant to pay annexation fees to RMWD with regard to water service and to incorporate water conservation measures. Payment of sewer annexation and collection fees, combined with a report to determine the impact to RMWD and identification of necessary facility impacts to RMWD, were identified as mitigating sewer-related impacts. Payment of annexation and development fees would be necessary with regard to fire, as well as automatic sprinklers in the Hewlett-Packard building. Payment of development fees to school districts was required for the anticipated 300 students associated with the project (schools were identified as being over capacity). The 1983 EIR does not discuss police protection.

Since preparation of the previous EIRs, the Project site has been annexed into the RMWD service district for water and sewer services and annexation fees to RMWD would no longer be necessary. Similarly, the Project is within the fire district per the North County Fire Protection District. The Proposed Project proposes two wastewater management options (one with RMWD and one with RMWD in combination with an off-site WTP on abutting property), which are discussed in greater detail in Chapter 1.0 and below.

The 1981 mitigation measures are no longer viable, as well water and a package WTP are not proposed as part of the Project. In addition, population in the area has changed, which is the basis for assessment of services impacts. The changes in existing service concerns, mitigation possibilities and potential for off-site sewage treatment at Meadowood, result in a requirement for wholly new subsequent analysis to wastewater management. Water services also would not require annexation into the RMWD. Schools and fire protection services require update with current response times and agency capacity. The reader is referred to text below for new and/or revised evaluation of water, wastewater management, schools, and fire and police protection.

A Water System Analysis, a Sewer Service Analysis, and Ten Percent Design Report for the Campus Park Sewer Lift Station, all prepared by Dexter Wilson Engineering, Inc. (2009a, 2009b, and 2009c, respectively), are included in Appendix I and summarized below. An FPP/FMP prepared by Hunt (2009), included in Appendix J, also is summarized below. In addition, Project Facility Availability Forms, as well as personal communications from service providers, are summarized below and included in Appendix I.

Existing Conditions

Water Supply

Available water supply information is continuously changing. Information below is current as of mid July 2009.

Senate Bill 610 (effective on January 1, 2002), which has been codified in the Water Code beginning with Section 10910, requires the preparation of a WSA for projects within cities and counties that propose to construct 500 or more residential units or the equivalent. Senate Bill 610 stipulates that when environmental review of certain large development projects is required, the water agency that is to serve the development must complete a WSA to evaluate water supplies that are or will be available during normal, single-dry, and multiple-dry years for a 20-year period to meet existing and planned future demands, including the demand associated with the project. The assessment includes, among other information, an identification of existing water supply entitlements, water rights, or other water service contracts relevant to the identified water supply for the project, water received in prior years pursuant to those entitlements, rights, and contracts, and a description of the quantities of water received in prior years by the public water system.

Enacted in 2001, Senate Bill 221 requires that the legislative body of a city or county which is empowered to approve, disapprove, or conditionally approve a subdivision map must condition such approval upon proof of sufficient water supply. The term "sufficient water supply" is defined in SB 221 as the total water supplies available during normal, single-dry, and multiple-dry years within a 20-year projection that would meet the projected demand associated with the proposed subdivision. The definition of sufficient water supply also includes the requirement that sufficient water encompass not only the proposed subdivision, but also existing and planned future uses, including, but not limited to, agricultural and industrial uses.

The Project site is located within RMWD, which provides water service to the unincorporated areas of northwestern San Diego County, specifically the unincorporated communities of Rainbow, Bonsall, and a portion of Fallbrook. The RMWD service area is bounded by Camp Pendleton to the west, City of Vista to the south, Fallbrook Community Planning Area to the east and County of Riverside to the north. RMWD covers 49,800 acres and serves approximately 7,000 households/businesses through 6,300 connections. RMWD has 17 reservoirs (total capacity 1,350 acre-feet [a.f.]), 46 pressure stations, and approximately 300 miles of pipeline. The majority of water service is provided to agricultural customers and the average daily consumption of RMWD is a maximum of approximately 84.2 million gallons per day (gpd) or 58,619 gpm.

The RMWD's May 2006 Water Master Plan Update Final Report uses SANDAG's population projections to determine ultimate water demand. The Campus Park Project was included in the RMWD Water Master Plan. The report states that the supply capacity of the existing aqueduct connections is projected to be adequate for ultimate demands. RMWD is a retail water supplier and a member agency of the San Diego County Water Authority (SDCWA), a wholesale water supplier. RMWD purchases 100 percent of its potable water from the SDCWA, which in turn purchases approximately 85 percent of its

potable water from the Metropolitan Water District of Southern California (MWD), which obtains water from the Colorado River and State Water Project (SWP) sources in northern California. Water from the Colorado River is delivered to the MWD via the Colorado River Aqueduct, and water from the SWP is delivered via the California Aqueduct. In December 2007, the District Court ruled that the threatened delta smelt required protection via restrictions on use of water pumps supplying water from the Sacramento/San Joaquin Delta associated with the SWP. These restrictions could result in the reduction of water from the SWP by as much as 40 percent.

MWD completed an Urban Water Management Plan (UWMP) in 2005 that evaluated water supplies and demand over a 20-year period under average conditions as well as under single and multiple year drought conditions. In the UWMP, MWD anticipated substantial cutbacks to water available (up to 50 percent) under the SWP. The UWMP concludes that reduced supply under these scenarios primarily could be made up from enhanced in-basin storage capacity added to the system since the 1990s. The shortfall could be made up even during a multiple dry-year scenario with cut backs of up to 45 to 50 percent over an average year. The UWMP also concludes that MWD can cover supply obligations to its member agencies (including SDCWA) through 2030, even under conditions existing in past droughts. MWD also has a Water Surplus and Drought Management (WSDM) Plan, which provides the overall strategy for managing MWD's resources to meet the range of estimated water demands for the calendar year. On a monthly basis, MWD provides to its Board with an update on the regional water supply and demand conditions and potential actions under the Water Surplus and Drought Management Plan. The monthly report provides the status of its supplies from the State Water Project, Colorado River, MWD storage, and storage/exchange programs to determine how to meet potential demands. Currently, MWD has called for a Water Supply Alert – Condition 2, which requires member agencies to adopt conservation measures consistent with the WSDM Plan in order to reduce demand throughout the service area; thereby preserving storage reserves and avoiding or minimizing the need for supply allocations should dry conditions continue.

SDCWA is actively pursuing water supplies from other resources to serve the region's needs through 2030. SDCWA's Updated 2005 UWMP (last updated in April 2007) identifies proposed water resources to be developed over the next 25 years to ensure long-term water supply reliability for the San Diego region. The Updated 2005 UWMP takes into account the population forecast from SANDAG's 2030 Cities/County Forecast. Projects identified in the Updated 2005 UWMP that would provide SDCWA water beyond that received from MWD include the Imperial Irrigation District water transfer and the All-American Canal and Coachella Canal lining projects.

In 1998, SDCWA signed an agreement with the Imperial Irrigation District for the long-term transfer of conserved Colorado River water to San Diego County. Under the agreement, Colorado River water is conserved by Imperial Valley farmers who voluntarily participate in the program. The conserved water is transferred to SDCWA for use in San Diego County. In 2006, SDCWA received 40,000 a.f. of water from this agreement with quantities increasing annually to 200,000 a.f. by 2021.

SDCWA was assigned Metropolitan's rights to conserve water from projects that will line the All-American Canal and Coachella Canal. The projects, if approved and implemented, will reduce the loss of water that currently occurs through seepage, delivering an additional 8.5 million a.f. of water to SDCWA and the San Diego region over the 110-year life of the agreement.

By 2030, water deliveries to the San Diego region from the above-mentioned projects will provide an estimated supply of 277,700 a.f. of potable water per year in addition to water purchased from MWD. The SDCWA also is pursuing potable water generation facilities in the County.

In 2001, SDCWA's Board of Directors approved the Seawater Desalination Action Plan, and in October 2006, the 2006 Desalination Action Plan was approved. SDCWA's current seawater desalination efforts focus on three main areas within San Diego County: (1) Encina Power Station in the City of Carlsbad, (2) San Onofre Generating Station in the northern portion of San Diego County on Marine Corps Base Camp Pendleton, and (3) the South Bay/South County area. The proposed regional seawater desalination project at the Encina Power Station includes a 50-million gpd seawater desalination facility sited on four acres of the station. The Final Environmental Impact Report for the Poseidon Resources Desalination Plant on the site of the Encina Power Station in Carlsbad was certified in June 2006 and approved by the San Diego RWQCB on May 13, 2009. The facility is expected to break ground in 2009 and be operational by 2012. SDCWA is currently focusing its efforts on implementing the 50-million gpd seawater desalination project at the Encina Power Station, but will continue to evaluate opportunities at San Onofre and South County as well. The goal for SDCWA's Regional Seawater Desalination Program is to generate up to 33,600 a.f. of potable water per year by 2020 and continuing at this level through the 2030 planning period. The SDCWA also has recently completed (April 2008) the Twin Oaks Valley WTP. The facility provides additional filtering capacity, thereby increasing the amount of potable water available for use. The WTP is the first for SDCWA and treats up to 100 million gpd of drinking water, or enough to serve up to 220,000 typical households per year.

SDCWA has a Drought Management Plan, which discusses drought response and supply allocation methodology. The Plan defines five phases of drought response, ranging from a normal period (where demand can be met by available water supplies) to drought emergency (more than 40 percent mandatory conservation). As of mid-July 2009, SDCWA is at a drought alert (up to 20 percent mandatory conservation).

Similarly, RMWD has prepared "An Ordinance of RMWD Adopting a Drought Response Conservation Program" (Ordinance No. 08-01), which discusses voluntary and mandatory water conservation under different levels of drought. Under this ordinance, there are four drought response levels. Level 1 (drought watch condition) "applies when SDCWA notifies its member agencies (including RMWD) that due to drought or other supply reductions, there is a reasonable probability there will be supply shortages and that a consumer demand reduction of up to 10 percent is required…." Level 2 (drought alert condition) applies when "due to cutbacks caused by drought or other reduction in supplies, a consumer demand reduction of up to 20 percent is required." Level 3 (drought critical condition) requires up to 40 percent consumer demand reduction, and Level 4 (drought emergency condition) requires more than a 40 percent reduction.

SDCWA also has a Blueprint for Water Conservation for Fiscal Years 2007 through 2012 (2007), which discusses the strategies for water conservation, including landscaping, indoor use (residential, commercial, institutional, and industrial), and agriculture.

There are two existing water service pressure zones in the vicinity of the Project site. The Canonita Zone system operates at a hydraulic grade line of 1,019 feet. The nearest facility to the Project site is a 16-inch-diameter water main in Stewart Canyon Road approximately 700 feet north of the site. From its intersection with I-15, this water main extends north and connects to the 6.0-million-gallon Canonita Tank. The Beck Zone system, located to the west and southwest of the Project site, operates at a hydraulic grade line of 897 feet. The nearest water line to the Project site is an 18-inch-diameter water main located in the Pala Mesa Drive overpass of I-15 (refer to Figure 1-31). The Beck Zone system includes the Beck Reservoir, which has a storage capacity of 203.7 million gallons.

Wastewater Management

The RMWD is responsible for collection, transmission, treatment, and disposal of wastewater generated from those areas of the district served by the public sewer system. RMWD has the capacity to treat 1.5 million gpd of wastewater at the recently (2004) expanded San Luis Rey WTP in Oceanside through a contract agreement with the City of Oceanside. According to SDCWA, the San Luis Rey WTP would be expanded to a capacity of 5.0 million gpd by 2020 (SDCWA 2008). RMWD currently uses about 1.0 million gpd of that capacity (Lee, pers. comm. 2008). RMWD does not have plans to contract out the remaining portion of their capacity because they plan to fully utilize it. RMWD maintains the pipelines and pumping equipment from the RMWD Plant B Pump Station, which is located just south-southwest of the Project site on Old Highway 395, to the San Luis Rey WTP.

The existing gravity sewers located in the vicinity of the Project site are in the east-central portion of the RMWD. An existing 12-inch-diameter gravity sewer main, called the Plant B Interceptor Line, begins west of I-15 at Reche Road and extends south and east along Tecalote Drive. The line then crosses under I-15 and follows Horse Ranch Creek southward along the southwestern boundary of the Project site across SR 76, as shown in Figure 1-32. As the line approaches San Luis Rey River, it turns to the west, crosses under I-15, and connects to the Plant B Pump Station. The pump station has a firm design capacity of 320 gpm, and the April 2006 Wastewater Master Plan identifies peak dry weather flows to this station as 242 gpm. The existing force main from the Plant B Pump Station is 6 inches in diameter and extends north from the pump station to a 24-inch gravity sewer main in SR 76.

A second gravity sewer line is located in the vicinity of the Project site. This 21- and 24-inch-diameter line is located in SR 76 beginning on the west side of I-15. This section of the line was constructed in 1988 as part of the Hewlett-Packard Campus Park improvements. The line continues west in SR 76 to Gird Road. This gravity sewer line currently is being used as part of RMWD's sewage conveyance system to deliver sewage to the San Luis Rey WTP. This gravity sewer main is part of the backbone sewerage system for the RMWD. It extends west and south and includes Lift Station Nos. 1 and 2 and their respective force mains as it conveys untreated wastewater to the San Luis Rey WTP in Oceanside.

Another force main was constructed as part of the Hewlett-Packard Campus Park improvements. This force main is a 10- and 12-inch-diameter ductile iron pipe inside a 16-inch-diameter steel casing that extends below the SR 76 bridge spanning I-15. The force main continues as a 10-inch-diameter pipe for approximately 200 feet on the west side of the bridge, where it connects to the 21-inch-diameter gravity sewer main in SR 76, which, in turn, connects to the above-mentioned 24-inch-diameter gravity sewer main in SR 76. A lift station that was intended to use the force main in SR 76 as a part of the Hewlett-Packard Campus Park improvements was never constructed.

Schools

The Project site is located within the service area of the Fallbrook Union High School District (FUHSD) and two different elementary school districts, the Bonsall Union School District (BUSD) and the Fallbrook Union Elementary School District (FUESD) (refer to Figure 4.1.6-1, School District Boundaries). In the BUSD, Bonsall Elementary School and Norman Sullivan Middle School are located within six miles of the Project site. In the FUESD, two elementary schools, Fallbrook Street Elementary School and Live Oak Elementary School, and one junior high school, Potter Junior High, are located within eight miles of the Project site. The nearest high school is Fallbrook High School, five miles from the Project site, which serves public high school students from the Fallbrook, Bonsall, and Vallecitos elementary school districts.

These schools, their distances, capacities, and current enrollment are presented in Table 4.1.6-1, Existing Schools in the Project Vicinity. Most of these schools are currently operating at or above capacity, according to school district staff; the exceptions are Bonsall Elementary School and Fallbrook Street School, which have some limited remaining capacity available.

A bond initiative to rebuild/replace (but not substantially expand) BUSD's existing, aging schools was recently passed. These funds are being used to rebuild Bonsall Elementary School (Jones 2008).

Fire Protection

The NCFPD, in conjunction with CalFire, would provide fire protection services to the proposed Campus Park development. The NCFPD is composed of the Rainbow Volunteer Fire Department and the Fallbrook Fire Department. It serves the Fallbrook, Bonsall, and Rainbow areas, with a primary service area of approximately 90 square miles and an estimated population of 45,000 people. The district also provides emergency medical services for 40 additional square miles outside the primary service area. The NCFPD currently operates six fire stations with 60 full time emergency services personnel, 14 support personnel, 20 reserve firefighters, and 33 volunteer firefighters.

The closest station to the Project site, Fire Station No. 4, is located at 4375 Pala Mesa Drive just west of Old Highway 395. Using existing roadways, the station is currently about two miles from the southern portion of the Project site and from the northern portion of the Project site. The station is staffed 24 hours per day by one captain, one engineer, two firefighter/paramedics, and one reserve firefighter. Equipment includes one medic engine, one medic ambulance, and one brush truck with off-road capabilities that is normally used only for wildfires.

During the 2007-2008 fiscal year, Fire Station No. 4 responded to approximately 1,263 calls, or 29 percent of the 4,309 calls received by the combined six fire stations in the NCFPD. On a daily basis, this station responded to an average of three calls per day, mostly related to traffic accidents on I-15.

The Public Facilities Element of the San Diego County General Plan states that for urban, unincorporated areas, the current minimally acceptable response time for emergency response is five minutes for single-family residential lots of less than two acres, multi-family residential, and all commercial development.

Police Protection

The County Sheriff's Department provides law enforcement services to the County's unincorporated areas. Such services include general patrol, traffic enforcement, criminal investigation, crime prevention, juvenile services, communications dispatch, and various management support services. The Sheriff's Department operates a substation at 388 East Alvarado Street in Fallbrook, which is approximately 10 miles west-northwest of the Project site. Staffing at the Fallbrook substation includes 33 sworn personnel, 5 non-sworn employees, and 5 reserve staff.

The Public Facilities Element of the San Diego County General Plan states that for urban, unincorporated areas, the current minimally acceptable response time is 8 minutes for priority calls (i.e., calls involving life-threatening situations or felonies in progress) and 16 minutes for non-priority calls. For rural, unincorporated areas, the current minimally acceptable response time is 12 minutes for priority calls and 24 minutes for non-priority calls. The Project site is located in an area that is currently considered a rural unincorporated area; however, the Project Applicant has requested a rezone to a CUDA.

Average response times in the first half of 2008 in the entire Fallbrook command were 15.3 minutes for priority calls and 30.7 minutes for non-priority calls (Brown, pers. comm. 2008). The Fallbrook

command, Beat 388, which includes the Project site, is bordered by I-15 to the west, the Fallbrook Community Planning Area limits to the south and east, and the Riverside County border to the north. In this area, average response times are 29.2 minutes for priority calls and 35.8 minutes for non-priority calls (Brown, pers. comm. 2008). Thus, existing conditions are such that current response times significantly exceed the minimally acceptable response times, regardless of the classification of the area as rural or urban unincorporated.

The Sheriff's Department recently has completed a law enforcement master plan and has identified the area in the vicinity of the Project site as a future expansion area not easily served from existing facilities (Mays, pers. comm. 2008). According to the Director of Facilities for the Sheriff's Department, construction of a new station or a public safety land set-aside in this general area would help ensure adequate police protection in the vicinity (Sampson, pers. comm. 2005). The Sheriff's Department also specified that the Campus Park West property would provide the most suitable location for a Sheriff's sub-station due to its proximity to SR 67 (Mays, pers. comm. 2008).

Guidelines for the Determination of Significance

Guidelines of Significance

A significant impact to utilities would occur if the Proposed Project would:

1. Create a demand for potable water that cannot be met with the current projected water supplies and/or that requires alterations to the existing water pipelines and infrastructure that is needed to convey potable water to the site, or would not comply with Senate Bills 610 and 221.

2. Generate wastewater that cannot be treated by an existing or proposed facility and/or requires alterations to existing sewage systems and infrastructure.

A significant impact to public services (schools, fire protection, and police protection) would occur if the Proposed Project would:

3. Result in the need for altered or new governmental facilities in order to maintain acceptable service ratios, response times, or other performance service measures.

Guideline Sources

The identified guidelines for significance are based on Appendix G of the CEQA Guidelines, the Public Facilities Element of the County of San Diego's General Plan, and the Fallbrook Community Plan, and are intended to ensure that adequate public utilities and services are available for local residents.

Analysis of Project Effects and Determination as to Significance

Water Supply (Guideline No. 1)

The Project Facility Availability Form completed by RMWD in July 2008 indicates that facilities to serve the Project would be available based on the capital facility plans of the district. The Water System Analysis (Dexter Wilson Engineering, Inc. 2009a) that was subsequently prepared is included in Appendix I of this EIR and is summarized below.

It is estimated that the Proposed Project would utilize approximately 568,900 gpd or 395 gpm of water (Table 4.1.6-2). The maximum day demand is expected to be 1,137,800 gpd (790 gpm), and the peak hour demand is estimated at 2,560,050 gpd or 1,778 gpm. RMWD purchases 100 percent of its potable

water from the SDCWA, which anticipates that sufficient water supplies will be available through 2030. Completion of the 2005 WSA by RMWD, and identification of adequate water supply, complies with Senate Bills 610 and 221. RMWD's WSA for the Proposed Project concluded that adequate water supply would be made available to the Project. The WSA was completed in 2005, when the proposed uses on site would have required more water than is currently proposed. At that time, the WSA estimated that the Proposed Project would require 1,060 acre feet per year and that such water was available. The current Project only would require approximately 637 acre feet per year.[3] Therefore, adequate water supply to the Project would be obtainable.

RMWD also previously provided a Project Facility Availability Form stating that water could be supplied to the Project within the next five years. It is anticipated that current drought conditions will have returned to "average-year" conditions prior to Project implementation. Impacts associated with water supply to the Project would be **less than significant**.

Figure 1-31 illustrates the proposed water system for the Project. At the southwestern end of the Project site, the existing Beck 897 Zone 18-inch-diameter water line in the Pala Mesa Drive/I-15 overcrossing would be extended via a 16-inch-diameter water line from I-15 east to Pankey Place within the new Pala Mesa Drive, then extend within Pankey Place to Horse Ranch Creek Road. This line would serve as the primary point of connection to the existing water system. In addition, for the purpose of redundancy, an existing Canonita 1,019 Zone 16-inch-diameter water line located within the northern extension of Pankey Road would be extended from its southern terminus through the proposed Horse Ranch Creek Road. These water system connections would be the primary feeds to the proposed 660 Zone system, which would provide water service to the entire Project development area. Since the existing Beck 897 Zone and Canonita 1,019 Zone hydraulic grade lines are too high for service at the Project site, two proposed pressure-reducing stations would be constructed at the connections to the existing water mains that would serve the Project. The stations would be installed on a concrete slab above grade and would include a 10-inch-diameter main valve capable of delivering up to 4,900 gpm continuous flow to meet the required fire flow capacity and a 4-inch-diameter valve with a flow range of 50 to 800 gpm to supply the domestic demands of the Project.

The majority of the on-site water lines would be eight inches in diameter. A 16-inch-diameter water line is proposed in Horse Ranch Creek Road and would deliver the required fire flows to the Town Center and office professional areas. To provide service to the multi-family residential area at southern end of the Project site, a 12-inch-diameter water main is proposed in Horse Ranch Creek Road south to SR 76, then west within SR 76. A proposed extension of Pankey Road to Pala Mesa Drive would provide the means for completing a water system loop at the south end of the Project site.

The RMWD Water Master Plan identifies an ultimate surplus of reservoir storage in the Beck 897 Zone, which would serve as the primary water supply for the Project. Because the Canonita 1,019 Zone system would be used only as a redundant system, there is no expectation of daily water use from that system. Therefore, the Project development would not create additional storage demand on the Canonita 1,019 Zone system.

Because the Proposed Project would create a demand for potable water that could be met with the current water storage capacity and the Project is in compliance with Senate Bills 610 and 221, impacts to water service would be **less than significant.**

[3] The reduction is due to fewer units currently proposed, as well as the transfer of part of the Specific Plan property to Palomar College.

Wastewater Management (Guideline No. 2)

The Project Facility Availability Form completed by RMWD in July 2008 indicates that facilities to serve the Project would not be available based on the capital facility plans of the district. The Sewer Service Analysis (Dexter Wilson Engineering, Inc. 2009b) prepared for the Proposed Project that was subsequently prepared is included in Appendix I of this EIR and is summarized below.

It is anticipated that the Proposed Project would generate approximately 294,520 gpd or 205 gpm of sewage (Table 4.1.6-3). The peak sewage flow is estimated to be 1,016,094 gpd or 706 gpm.

Figure 1-32 illustrates the proposed sewer system for the Project. The on-site sewer system would primarily consist of eight-inch-diameter gravity sewer lines within all neighborhood collector roads within the Proposed Project. In Horse Ranch Creek Road, a larger sewer line would be necessary because of the flatter grade of the proposed road and because this line would be the collector sewer for the Project. Preliminary sizing analysis indicates that 10-inch-diameter sewer mains would be needed in Horse Ranch Creek Road and 15-inch-diameter sewer lines would be needed from Horse Ranch Creek Road west to the new sewer lift station in the southern portion of the Project site to accommodate ultimate Project sewage flows. It is assumed that no sewage generated by the Project would enter into the existing 12-inch-diameter Plant B Collector sewer system. (The recommended gravity sewer main sizes would accommodate the flows from the Palomar College site, which has 100 EDUs of sewer capacity.) Instead, it is proposed that a new sewer lift station with a minimum firm pumping capacity of 918 gpm be constructed in the southwestern corner of the Project site (PA I-1 [Figure 1-32]) to provide pumping capacity for the buildout of the Proposed Project, Palomar College, and the 12-inch-diameter interceptor line. The lift station would pump all wastewater to the existing 12-inch-diameter force main in SR 76.

Currently, an agreement between the Project Applicant and RMWD allows for the conveyance, treatment, and disposal of wastewater for 850 EDUs, or approximately 72 percent of the Project's estimated 1,178 EDUs (approximately 295,000 gpd) of sewage needs.

Two wastewater management design options to securing the additional capacity are analyzed in this EIR, only one of which would be implemented. One approach (Wastewater Management Option 1) consists of use of EDU service already secured (for 850 EDUs), as well as for the Project Applicant to purchase additional unconnected EDUs for sewage disposal from RMWD when unconnected but previously allocated EDUs are repurchased by and returned to RMWD. Under Wastewater Management Option 2, sewage from 850 EDUs would be treated at the RMWD WTP, with the remainder to be treated at a new WTP within the adjacent Meadowood project. Under this option, the Proposed Project would join other developers in the vicinity to pay for the construction and operation of the new WTP. Under Option 2, a storage pond would be constructed within the Project site.

The Project's on-site sewer lift station would be able to fit into either sewer treatment and disposal scenario. The sewer lift station would deliver sewage flows in SR 76 to the west side of I-15, from which point the flows could be conveyed west to Oceanside or to the potential WTP within Meadowood.

All on- and off-site impacts associated with the extension of wastewater facilities related to individual resource areas are detailed throughout Chapters 2.0 and 3.0. Because Campus Park wastewater would be treated at either an existing or proposed facility, in accordance with Guideline No. 3, the Project would result in **less than significant impacts**.

Schools (Guideline No. 3)

The residential component of the Proposed Project would generate new school-aged students. BUSD uses a student generation rate derived from SANDAG data of 0.4 student per single- or multi-family dwelling unit for grades kindergarten through eighth to calculate potential impacts from residential development projects. To forecast kindergarten through eighth grade student numbers in its district, FUESD uses a rate of 0.261 student per single-family residence, and 0.435 student per multi-family residence. FUHSD uses a rate of 0.152 student per single-family residence and 0.199 student per multi-family residence to calculate increased high school populations. Applying these rates, the Proposed Project would contribute approximately 367 new elementary/middle school students and 189 new high school students, for a total of 556 students, to the Bonsall and Fallbrook school districts. The anticipated distribution of new students among the three school districts is outlined in Table 4.1.6-4, Anticipated Number of New Students from the Project.

All three school districts have indicated that the Proposed Project would result in the overcrowding of one or more of the schools noted above in Section 3.5.1, Existing Conditions, contributing to the need for expansion of existing schools and/or new schools (Jones, pers. comm. 2008, Proctor, pers. comm. 2008, Gannet, pers. comm. 2008). The FUHSD is in a long-term site-selection process to build a new comprehensive high school. The District plans to float a bond issue to help finance it in combination with any mitigation funds provided by new residential development projects in the area (Gannet, pers. comm. 2008). In accordance with California Education Code Section 17620, prior to the issuance of building permits the Project Applicant would pay development impact fees to the school district, which are intended to reflect a fair share contribution toward school improvements needed to serve cumulative development. Therefore, the Proposed Project is anticipated to have a **less than significant impact** on school services.

The County has a School Facilities Mitigation Ordinance (7966), which requires mitigation of school facilities impacts prior to legislative action on a project such as the Proposed Project. The ordinance requires execution of a binding agreement between an applicant and the affected school district prior to legislative approvals associated with a proposed project. Such an agreement can consist of a statement by the affected district that fees routinely assessed at the building permit stage are sufficient to mitigate impacts, and that no agreement is necessary. The Project would be required to execute an agreement between the Project Applicant and the affected school districts in order to set forth the methodology for providing school services to students generated by the Project. This agreement would ensure that school services and adequate facilities would be available concurrent with the number of students generated by the Project and impacts would be **less than significant**.

In addition, it should be noted that a new 12.4-acre elementary school is planned in the Meadowood project immediately east of the Project site, within BUSD, which could potentially serve part of the Proposed Project's school population. The Proposed Project's fees may go toward the construction of this school. If a school is not developed on the Meadowood site, the Proposed Project's fees would be paid to the district and would go toward other school improvement/development projects.

It is currently unclear how the Project's impacts on schools would be distributed among the Fallbrook High Unified, Fallbrook Elementary Unified, and Bonsall Unified school districts, and whether all the students from the Proposed Project would attend schools in the same or different districts. Additionally, elementary school-aged students in the existing Lake Rancho Viejo residential development southeast of the intersection of I-15 and SR 76 currently are being bused to Bonsall Elementary School. These students and any new students in the expanding Lake Rancho Viejo development could benefit from the construction of a closer school designed to serve the student populations of the Proposed Project and nearby developments such as the Meadowood and Campus Park West projects. The district has suggested

that the ultimate school service plan for the Project area could involve inter-district agreements for student transfers or other special joint arrangements, potentially requiring collaboration among the school districts and developers of nearby residential projects.

Fire Protection (Guideline No. 3)

The Fire Marshall has indicated that the Proposed Project is eligible for service. Because of the close proximity of Fire Station No. 4 to the Project site, and based on a July 9, 2009 communication from the County Fire Marshal, it is expected that this station would be generally consistent with the General Plan Public Facility Element response time target goal of five minutes once road improvements are implemented; including opening of the Pala Mesa Drive/I-15 overpass, extension of Pala Mesa Drive to existing Pankey Road, and construction of Pankey Place and Horse Ranch Creek Road. Fire Station No. 4 has "first in" responsibility for the Project site.

Response to a structure fire would include two engine companies, a ladder truck, and a Battalion Chief. The ladder truck and crew would come from the Pala Reservation; a response would not be guaranteed if there also was a fire at the Reservation. The NCFPD does not have an aerial ladder truck, which might be needed on scene for an effective fire attack at a commercial building fire or a fire in multi-family residential units; the second closest aerial ladder truck is located at the City of Vista's Fire Station No. 1, about 15 miles away.

Total personnel on scene would be approximately 10 firefighters plus the Battalion Chief. Total response time would be about 15 minutes. Response to a vegetation fire would be four engine companies and a Battalion Chief, for a total of 13 firefighters from within the NCFPD. The travel time would be about 15 minutes. CalFire also would respond to a vegetation fire on the Project site depending upon the size of the fire and the threat. More information on fire protection and fuel management is provided in Section 4.1.3, Hazards and Hazardous Materials.

The Project would comply with all the conditions and recommendations regarding access, water supply, fire sprinklers and other fire protection systems, ignition-resistant structures, and vegetation management (including combustible vegetation clearance) described in the Project Facility Availability Form in Appendix I and Sections 5 through 8 of the Conceptual FPP/FMP (Hunt 2009; EIR Appendix J). The Project Applicant also would contribute developer fees toward improved fire protection services in the area, and these services would benefit from increased property taxes and other County revenues. Therefore, impacts to fire protection services would be **less than significant** as a result of Proposed Project implementation.

Police Protection (Guideline No. 3)

The current minimally acceptable response time is 8 minutes for priority calls and 16 minutes for non-priority calls. The current average response time to the Project site is approximately 23 minutes for priority calls and 35 minutes for non-priority calls, which exceeds the acceptable response time. Although service demand would likely increase with implementation of the Project, improvements to roads and intersections on and off site as a result of Project development and the RTIP could improve existing response times in the Project area. However, adequate response times to the project site by the Sheriff's Department cannot be guaranteed to fall within the 8-minute (for priority calls) or 16-minute (for non-priority calls) timeframe designated by the Public Facility Element of the General Plan. The Sheriff's Department has indicated that future response times to the Project cannot be accurately estimated, as they depend on such factors as type of call, call priority, previous calls pending, time of day, location of squad car, and amount of traffic. The Sheriff's Department recently has completed a law enforcement master plan and has identified the area in the vicinity of the Project site as a future expansion area not easily served from existing facilities. The Project Applicant offered a location in the Town Center or office professional areas of the Proposed Project for a substation. According to the Director of

Facilities for the Sheriff's Department, construction of a new station or a public safety land set-aside in this general area would help ensure adequate police protection in the vicinity (Sampson, pers. comm. 2005). The Sheriff's Department determined the Project site to be unsuitable for a sub-station and is currently evaluating the property west of the Project site. The facility would be sized to accommodate staff and equipment necessary to serve known need. In addition, via communications between DPLU and the Sheriff's Department, potential impacts to law enforcement services occur with the potential construction of all the developments in this quadrant of the County. Therefore, the Project does not generate a direct impact to police protection. Accordingly, impacts to police protection services would be **less than significant** as a result of the Proposed Project.

Cumulative Impact Analysis

A number of related cumulative projects are planned for development in the vicinity of the Campus Park Project, as listed in Tables 1-14 and 1-15. These future projects include residential developments totaling approximately 4,021 units, as well as other types of development, such as expansion of the Pala Mesa Resort. Cumulative impacts of these development projects are discussed below. The significance guidelines that were used to evaluate Project-specific impacts, described above, are also used here to evaluate cumulative impacts.

Water Supply

Based on the average household consumption of approximately 400 to 500 gpd, the future cumulative increase in demand (including the Proposed Project) would be 2.0 to 2.5 million gpd. According to the Draft Regional Water Facilities Master Plan (SDCWA 2002), water demand associated with cumulative development in the Project vicinity is expected to be within the demand anticipated for this region by the Year 2010 of approximately 39,800 acre-feet per year, or about 35.5 million gpd. According to the RMWD Master Plan, the cumulative growth and associated water demand described here would be within that anticipated by RMWD. Expanded facilities and water supply would be available to serve these projects and would not necessarily require the installation of additional facilities beyond those planned in the RMWD Master Plan. Each project would be required to pay appropriate fees for each EDU prior to granting of building permits for all approved projects. Such fees would go toward the cost of construction of expanded facilities. Therefore, cumulative impacts to water utilities are anticipated to be **less than significant.**

Wastewater Management

Wastewater treatment would be provided by the San Luis Rey WTP in Oceanside under both Wastewater Management Option 1 and 2.

The San Luis Rey WTP has a current capacity of 1.5 million gpd and is operating at approximately 67 percent of its capacity (1.0 million gpd). Based on an average of 250 gpd per household, the total cumulative residential sewage generation (including the Proposed Project) would be approximately 1.3 million gpd over current levels. (This estimate is considered conservative in that (1) some projects would not be within RMWD and therefore may not be treated by the San Luis Rey WTP and (2) some projects may utilize septic systems.) This would further increase sewage treatment demand over the maximum service capacity of the San Luis Rey WTP. However, the RMWD Wastewater Master Plan recognizes the cumulative need for additional treatment capacity. The Proposed Project and other cumulative projects within the district would pay appropriate fees prior to granting of building permits for all approved projects. Because the Proposed Project has been accounted for within the Wastewater Master Plan prepared by RMWD and capacity is available for the Proposed Project, the Project's contribution to cumulative impacts on wastewater treatment services would be **less than significant.**

Under Wastewater Management Option 2, sewage from 850 EDUs would be treated at the San Luis Rey WTP in Oceanside, with the remainder to be treated at a new WTP within Meadowood, and managed by them or another public entity. Because the new WTP would be large enough to accommodate sewage from Meadowood and the Proposed Project and because the San Luis Rey WTP would accommodate 850 EDUs of sewage from the Proposed Project (as described above), under Option 2, the Project's contribution to cumulative impacts on wastewater treatment services would be **less than significant**.

Schools

Cumulatively, the future residential projects listed in Tables 1-14 and 1-15 would generate approximately up to 2,167 elementary/middle school and 1,015 high school-aged students. The scale of cumulative development in the vicinity of the Proposed Project is such that cumulative conditions would result in students in excess of existing and planned school capacities. The affected school districts would need to expand school facilities. The required payment of Project direct development impact fees to the affected school districts would avoid significant impacts upon schools from the Proposed Project. Other future developments also would be required to pay school fees and/or dedicate land for schools commensurate with their impact contribution. Because the adverse effect of student loading on area schools would be addressed during routine payment of fees, the Proposed Project's contribution cumulative impacts upon schools in the Fallbrook and Bonsall areas would be **less than significant.**

Fire Protection

As noted above and in Section 4.1.3 of this EIR, Project-related development fees and property taxes would benefit the NCFPD, which also has required the incorporation of certain fire prevention design measures into the Proposed Project. Paying these fees and meeting the design requirements would avoid significant impacts from Project development. Likewise, development of other projects in the vicinity of the Proposed Project also would be required to pay developer fees and property taxes, and incorporate similar design measures to avoid significant fire service impacts. Compliance with these existing programs would ensure that the cumulative effect of Project development on fire protection would be **less than significant.**

Police Protection

To plan for future growth, the Sheriff's Department completed the Law Enforcement Facilities Master Plan (2005). In addition to assessing the existing conditions of County law enforcement facilities, the Law Enforcement Facilities Master Plan, using population projections prepared by SANDAG, recommended the construction of a new station along the northern section of the I-15 corridor (Mays, pers. comm. 2006). As an example, the future proposed projects in the quadrant, including the Proposed Project, would support approximately 13,891 people. Facilities identified in the Law Enforcement Facilities Master Plan are prioritized into categories one through four; the new facility to be located in the I-15 corridor is listed as a priority four with an approximate occupancy for a future station. However, based upon discussion with the Sheriff's Department, the preferable future location would be south of SR 76, possibly within the Campus Park West project site.

The cumulative impacts analyzed within this EIR analyze those impacts that are reasonably foreseeable by construction of a Sheriff's station at the Campus Park West project site. The Campus Park West project is included in the list of cumulative projects discussion in Section 1.7. Environmental impacts associated with the development of Campus Park West, including civic uses permitted within the commercial land use designation, are analyzed within the cumulative discussions in Chapters 2.0 and 3.0 of this EIR. Therefore, cumulative impacts associated with the Proposed Project would be **less than significant**.

Mitigation

Because no significant impacts were identified, mitigation is not proposed.

Conclusion

Development of the Proposed Project is not expected to result in significant impacts to water or sewer services, schools, or fire and police protection services beyond the incremental impacts usually addressed through the payment of developer fees, taxes, or service fees, and the contribution of appropriate funds to fund a Sheriff's station. Payment of the developer fees and contribution of appropriate funds would reduce the Proposed Project's impacts to schools, fire, police, and water and sewer services to below a level of significance because they would ensure that the districts would have adequate funds to provide for upgraded facilities in accordance with their improvement plans in a timely manner.

Table 4.1.2-1
SUMMARY OF TYPICAL CONTAMINANT SOURCES FOR URBAN STORM WATER RUNOFF

Contaminant	Contaminant Sources
Sediment and Trash/Debris	Streets, landscaping, driveways, parking areas, rooftops, construction activities, atmospheric deposition, drainage channel erosion
Pesticides and Herbicides	Landscaping, roadsides, utility right-of-ways, soil wash-off
Organic Compounds	Landscaping, streets, parking areas, animal wastes, recreation areas
Oxygen Demanding Substances	Landscaping, animal wastes, leaky sanitary sewer lines, recreation areas
Heavy Metals	Automobiles, bridges, atmospheric deposition, industrial areas, soil erosion, corroding metal surfaces, combustion processes
Oil and Grease/Hydrocarbons	Roads, driveways, parking lots, vehicle maintenance areas, gas stations, illicit dumping to storm drains
Bacteria and Viruses	Landscaping, roads, leaky sanitary sewer lines, sanitary sewer cross-connections, animal wastes, recreation areas
Nutrients (Nitrogen and Phosphorus)	Rooftops, landscaping, atmospheric deposition, automobile exhaust, soil erosion, animal wastes, detergents, recreation areas

Source: USEPA 1999

Table 4.1.2-2
TYPICAL LOADINGS FOR SELECTED CONTAMINANTS IN RUNOFF FROM VARIOUS LAND USES (lbs/acre/year)

Land Use	TSS	TP	TKN	NH_3 - N	NO_2 + NO_3 - N	BOD	COD	Pb	Zn	Cu
Commercial	1000	1.5	6.7	1.9	3.1	62	420	2.7	2.1	0.4
Parking Lot	400	0.7	5.1	2	2.9	47	270	0.8	0.8	0.04
HDR	420	1	4.2	0.8	2	27	170	0.8	0.7	0.03
MDR	190	0.5	2.5	0.5	1.4	13	72	0.2	0.2	0.14
LDR	10	0.04	0.03	0.02	0.1	N/A	N/A	0.01	0.04	0.01
Freeway	880	0.9	7.9	1.5	4.2	N/A	N/A	4.5	2.1	0.37
Industrial	860	1.3	3.8	0.2	1.3	N/A	N/A	2.4	7.3	0.5
Park	3	0.03	1.5	N/A	0.3	N/A	2	0	N/A	N/A
Construction	6000	80	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Grains/Hay	400	0.8	N/A	N/A	N/A	20	150	N/A	N/A	N/A
Citrus/Vegetables	400	1.5	N/A	N/A	N/A	30	200	N/A	N/A	N/A

HDR = High Density Residential; MDR = Medium Density Residential; LDR = Low Density Residential
N/A = Not available; insufficient data to characterize
TSS = Total Suspended Solids; TP = Total Phosphorus; TKN = Total Kjeldahl Nitrogen; NH_3 – N = Ammonia – Nitrogen; NO_2 + NO_3 – N = Nitrite + Nitrate - Nitrogen; BOD = Biochemical Oxygen Demand; COD = Chemical Oxygen Demand; Pb = Lead; Zn = Zinc; Cu = Copper
Sources: USEPA 1999; RWQCB 1988

Table 4.1.2-3
SURFACE AND GROUNDWATER QUALITY OBJECTIVES FOR THE LOWER SAN LUIS HYDROLOGIC AREA AND THE BONSALL HYDROLOGIC SUBAREA[1]

SURFACE WATER												
Lower San Luis Hydrologic Area												
Constituent (mg/l or as noted)												
TDS	**Cl**	**SO_4**	**% Na**	**N&P**	**Fe**	**Mn**	**MBAS**	**B**	**Odor**	**Turb NTU**	**Color Units**	**F**
500	250	250	60	--[2]	0.3	0.05	0.5	0.75	None	20	20	1.0
GROUNDWATER												
Bonsall Hydrologic Subarea												
Constituent (mg/l or as noted)												
TDS	**Cl**	**SO_4**	**% Na**	**NO_3**	**Fe**	**Mn**	**MBAS**	**B**	**Odor**	**Turb NTU**	**Color Units**	**F**
1,500	500	500	60	45	0.85	0.15	0.5	0.75	None	5	15	1.0

[1] Concentrations not to be exceeded more than 10% of the time during any one-year period; refer to Figure 4.1.2-1 for local hydrologic designation locations.
[2] Shall be maintained at levels below those that stimulate algae and emergent plant growth.
Abbreviation Key: TDS = Total Dissolved Solids; Cl = Chlorides; SO_4 = Sulfate; Na = Sodium; N&P = Nitrogen and Phosphorus; NO_3 = Nitrate; Fe = Iron; Mn = Manganese; MBAS = Methylene Blue Activated Substances (e.g., commercial detergent); B = Boron; Turb = Turbidity (measured in Nephelometric Turbidity Units [NTU]); F = Fluoride.
Source: RWQCB 1994, as amended

Table 4.1.3-1
SUMMARY OF REGULATIONS POTENTIALLY APPLICABLE TO CAMPUS PARK COMMERCIAL/OFFICE PROFESSIONAL USES

Regulation	Administering Agency	Requirements/ Compliance
Federal Jurisdiction		
CERCLA ("Superfund") 42 USC 9601 et seq. As amended by SARA, Emergency Planning and Community Right-to-Know Act of 1986 (SARA Title III) 42 USC § 11001 et seq.; 40 CFR Parts 350, 355, and 370.	USEPA Region IX, National Response Center, and San Diego County Environmental Health Division	CERCLA – release notification requirements; SARA Title III – requirements for emergency planning and community right-to-know for storage, handling, or production of significant quantities of hazardous or acutely toxic substances
Resource Conservation and Recovery Act (RCRA); 42 USC § 6901 et seq.; 40 CFR Parts 260-272	USEPA Region IX, California DTSC	Sets forth standards for the generation and management of solid waste; requires application to the DTSC for an USEPA identification number in the event occupants are hazardous waste generators
29 USC § 651, 29 CFR § 1910 et seq., and § 1926 et seq.	Cal-OSHA	Meet requirements for equipment used to store and handle hazardous materials to protect workers
40 CFR, Parts 172, 173, and 179.	U.S. DOT, California Highway Patrol, Department of Motor Vehicles, and Caltrans	Meet standards for labels, placards, and markings on hazardous materials and hazardous waste shipments
Federal Atomic Energy Act 40 USC 2021	Nuclear Regulatory Commission and California Department of Health Services	Meet requirements for handling of radioactive materials and radioactive materials licensing

Table 4.1.3-1 (cont.)
SUMMARY OF REGULATIONS POTENTIALLY APPLICABLE TO CAMPUS PARK COMMERCIAL/OFFICE PROFESSIONAL USES

Regulation	Administering Agency	Requirements/ Compliance
Federal Jurisdiction (cont.)		
40 CFR, Part 68	Federal Risk Management Plan	Requires a Risk Management Plan for facilities handling acutely hazardous materials in amounts over the threshold planning quantity for that material
State/Regional/Local Jurisdiction		
8 CCR § 339, § 3200 et seq., 5139 et seq., and 5160 et seq.	Cal-OSHA	Addresses control of hazardous substances in the workplace
California Water Code §§ 13260-13269; 23 CCR § 2S10 Article 9 et seq.	RWQCB	Addresses waste discharge requirements and will apply to any storage or disposal or solid and liquid wastes to the extent that such action may affect the quality of the waters of the state
Hazardous Waste Control Act of 1972 as amended; California Health & Safety Code § 25100 et seq.; 22 CCR § 25100 et seq.	USEPA Region IX, DTSC, and San Diego County HMD	Addresses the generation, storage, and preparation for shipment of hazardous wastes, if generated by tenants
California Health and Safety Code §§ 25500-25543.3, CCR § 2720-2734	San Diego County HMD	Requires preparation of Hazardous Materials Business Plan
California Code of Regulations, Title 19, Division 2, Chapter 4.5	San Diego County HMD	Requires preparation of a California Accidental Release Prevention Program (including a Risk Management and Prevention Program) for hazardous chemicals stored or used on site in excess of the state threshold quantities
Uniform Fire Code and California Fire Code, Article 80, 79, 4	San Diego County Fire Department	Meet requirements for the storage and handling of hazardous materials (Article 80) and flammable and combustible liquids (Article 79)
California Building Code	California Building Standards Commission	Meet requirements for building construction for facilities handling hazardous materials and/or biohazards
California Health and Safety Code § 25800 et seq.	California Department of Health Services	California Radiation Control Law requires compliance with requirements for handling radioactive materials and limits exposures to emissions from radioactive materials use
California Environmental Quality Act Statutes PRC §21154.4	Office of Planning and Research	Requires notification of schools within 0.25 mile of all facilities containing hazardous materials or waste

Table 4.1.3-2
PROHIBITED PLANT MATERIAL

Botanical Name	Common Name
TREES	
Abies spp.	Fir trees
Acacia spp.	Acacia
Agonis juniperina	Juniper myrtle
Araucaria spp.	Norfolk island pine
Callistemon spp.	Bottlebrush
Cedrus spp.	Cedar including deodar cedar
Chamaecyparis spp.	False cypress
Cinnamomum camphora	Camphor Tree (okay in Zone 2)
Conifers	-
Cryptomeria japonica	Japanese cryptomeria
Cupressocyparis leylandii	Leylandii cypress
Cupressus forbesii	Tecate cypress
Cupressus glabra	Arizona cypress
Cupressus sempervirens	Italian cypress
Cupressus spp.	Cypress
Eucalyptus spp.	Eucalyptus
Juniperus spp.	Juniper
Larix spp.	Larch
Olea europea	Olive[1]
Palm spp.	Palms
Pinus spp.	Pine
Podocarpus spp.	Fern pine
Pseudotsuga manziesii	Douglas fir
Schinus molle	California pepper
Tamarix spp.	Tamarix
Taxodium spp.	Cypress
Taxus spp.	Yew
Tsuga spp.	Hemlock
GROUNDCOVERS, SHRUBS, AND VINES	
Acacia spp.	Acacia
Adenostoma fasciculatum	Chamise
Adenostoma sparsifolium	Red shanks
Anthemis cotula	Mayweed
Arbutus menziesii	Madrone
Arctostaphylos spp.	Manzanita
Arundo donax	Giant reed or cane
Artemesia californica	California sagebush
Artemesia caucasia	Silver spreader
Artemesia pycnocephala	Sandhill sage
Artemesia spp.	-
Atriplex spp.	Saltbush
Baccharis spp., including *Baccharis pilularis consanguine*	Coyote bush
Bambusa spp.	Bamboo
Bougainvillea spp.	Bougainvillea
Brassica nigra	Black mustard
Brassica rapa	Yellow mustard
Cardera draba	Noary cress

Table 4.1.3-2 (cont.)
PROHIBITED PLANT MATERIAL

Botanical Name	Common Name
GROUNDCOVERS, SHRUBS & VINES (cont.)	
Carpobrotus spp.	Ice plant, hottentot fig
Cirsium vulgare	Wild artichoke
Conyza bonariensis	Horseweed
Coprosma pumila	Prostrate coprosma
Cortaderia selloana	Pampas grass
Cytisus spp.	Scotch broom, French broom
Dodonea viscose	Hopseed bush
Eriogonum fasciculatum	California buckwheat
Eriogonum spp.	Common buckwheat
Fremontodendron spp.	Flannel bush
Hedera helix	English ivy
Heterotheca grandiflora	Telegraph plant
Juniperus spp.	Juniper
Lactuca serriola	Prickly lettuce
Mahonia spp.	Mahonia
Miscanthus spp.	Eulalie grass
Nicotania bigelevil	Indian tobacco
Nicotania glauca	Tree tobacco
Pennisetum setaceum	Fountain grass
Perronskia atriplicifloria	Russian sage
Pickeringia 'Montana'	Chaparral pea
Rhus diversiloba	Poison oak[2]
Rhus laurina	Laurel sumac
Ricinus communis	Castor bean
Rosmarinus spp.	Rosemary
Salvia mellifera	Black sage
Salvia spp.	Sage including purple sage
Sacsola austails	Russian thistle
Solanium xantii	Purple nightshade[3]
Sylibum marianum	Milk thistle
Tamarix spp.	Tamarisk
Thuja spp.	Arborvitae
Urtica urens	Burning nettle
Vinca major	Periwinkle
Rhus lentii	Pink flowering sumac

Source: Hunt 2009
[1] Prohibited if any flammable understory or if not properly spaced or not located properly away from structures
[2] Prohibited for the safety of workers/firefighters
[3] Toxic plant

Table 4.1.6-1
EXISTING SCHOOLS IN THE PROJECT VICINITY

School District	School (Grade Range)	Distance from Project Site (miles)	Enrollment (number of students)	Capacity (number of students)	Available Capacity (number of students)
Fallbrook Union Elementary School District[1]	Fallbrook Street School (K-2nd)	8	470	520	50
	Live Oak Elementary School (3rd-6th)	4	760	780	20
	Potter Junior High School (7th-8th)	4	1,084	1,080	-4
Bonsall Union School District[1]	Bonsall Elementary School (K-5th)	6	863	968	105
	Norman Sullivan Middle School (6th-8th)	5	580	560	-20
Fallbrook Union High School District[2]	Fallbrook High School (9th-12th)	5	2,905	3,300	395

Sources: FUHSD, FUESD, and BUSD, personal communications, 2005 and 2008
[1] Enrollment and capacity numbers for FUESD and BUSD are from 2005. Updated information from these districts were requested in 2008; however, none could be provided.
[2] Enrollment and capacity numbers for FUHSD are from 2008.

Table 4.1.6-2
WATER DEMAND PROJECTIONS

Land Use	Quantity	Demand Factor	Average Water Use (gpd)
Single-family Residential	521 units	500 gpd/unit	260,500
Multi-family Residential	555 units	400 gpd/unit	222,000
Town Center	8.1 acres	3,000 gpd/acre	24,300
Office Professional	157,000 s.f.	100 gpd/1,000 s.f.	15,700
Developed Parks	3.1 acres	4,000 gpd/acre	12,400
Sports Complex	8.5 acres	4,000 gpd/acre	34,000
		TOTAL	**568,900 gpd or 395 gpm**

Source: Dexter Wilson Engineering, Inc. 2009a

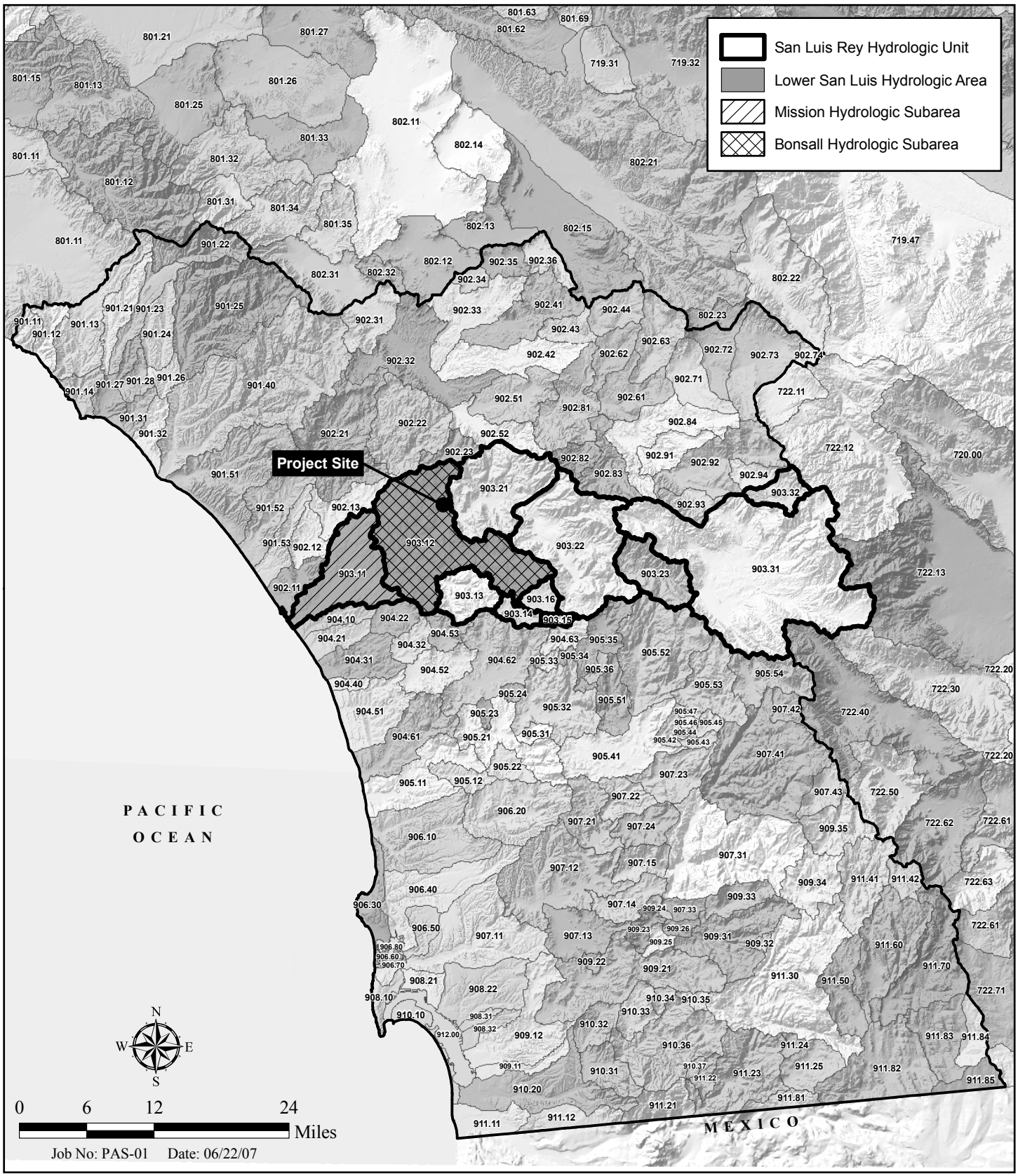
Table 4.1.6-3
SEWER FLOW PROJECTIONS

Land Use	Quantity	EDUs	Demand	Average Sewage Flow (gpd)
Single-family residential	521 units	521.0	250 gpd/EDU	130,250
Multi-family residential	555 units	555.0		138,750
Town Center	61,200 s.f.	25.9		6,470
Office Professional	157,000 s.f.	64.2		16,050
Developed Parks	7 parks	7.0		1,750
Sports Complex	1 complex	5.0		1,250
			TOTAL	**294,520 gpd or 205 gpm**

Source: Dexter Wilson Engineering, Inc. 2009b

Table 4.1.6-4
ANTICIPATED NUMBERS OF NEW STUDENTS FROM THE PROJECT

School District	Type of DU	Number of DUs	Student Generation Rate (Students/DU)	Number of Students
Bonsall Union School District	Multi-family	300	0.4	120
Fallbrook Union Elementary School District	Single-family	521	0.261	136
	Multi-family	255	0.435	111
Total Number of Kindergarten through Eighth Grade Students				**367**
Fallbrook Union High School District	Single-family	521	0.152	79
	Multi-family	555	0.199	110
Total Number of High School Students				**189**
GRAND TOTAL NUMBER OF STUDENTS				**556**



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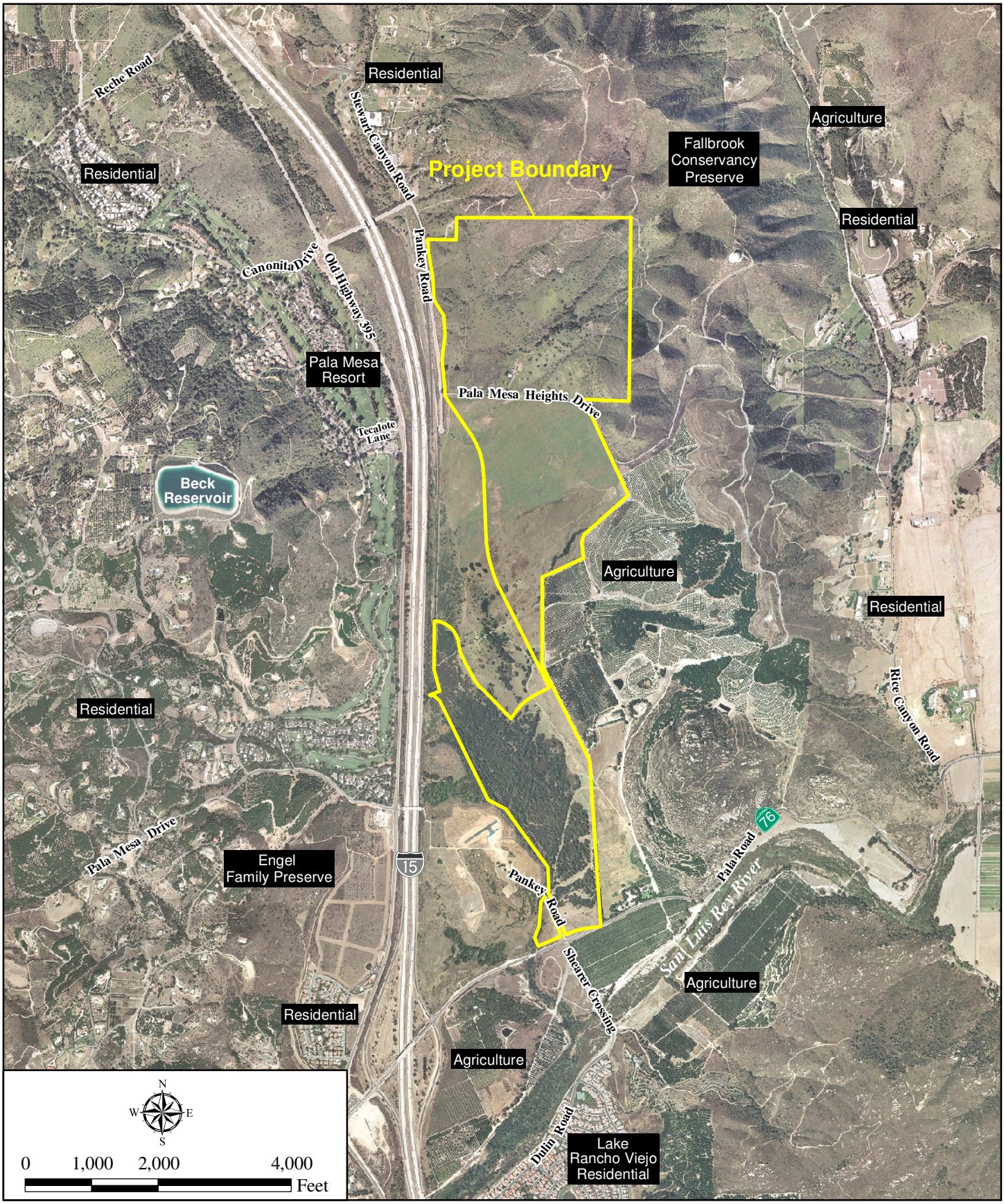
Project Location within Local Hydrologic Designations

CAMPUS PARK PROJECT

HELIX

Figure 4.1.2-1



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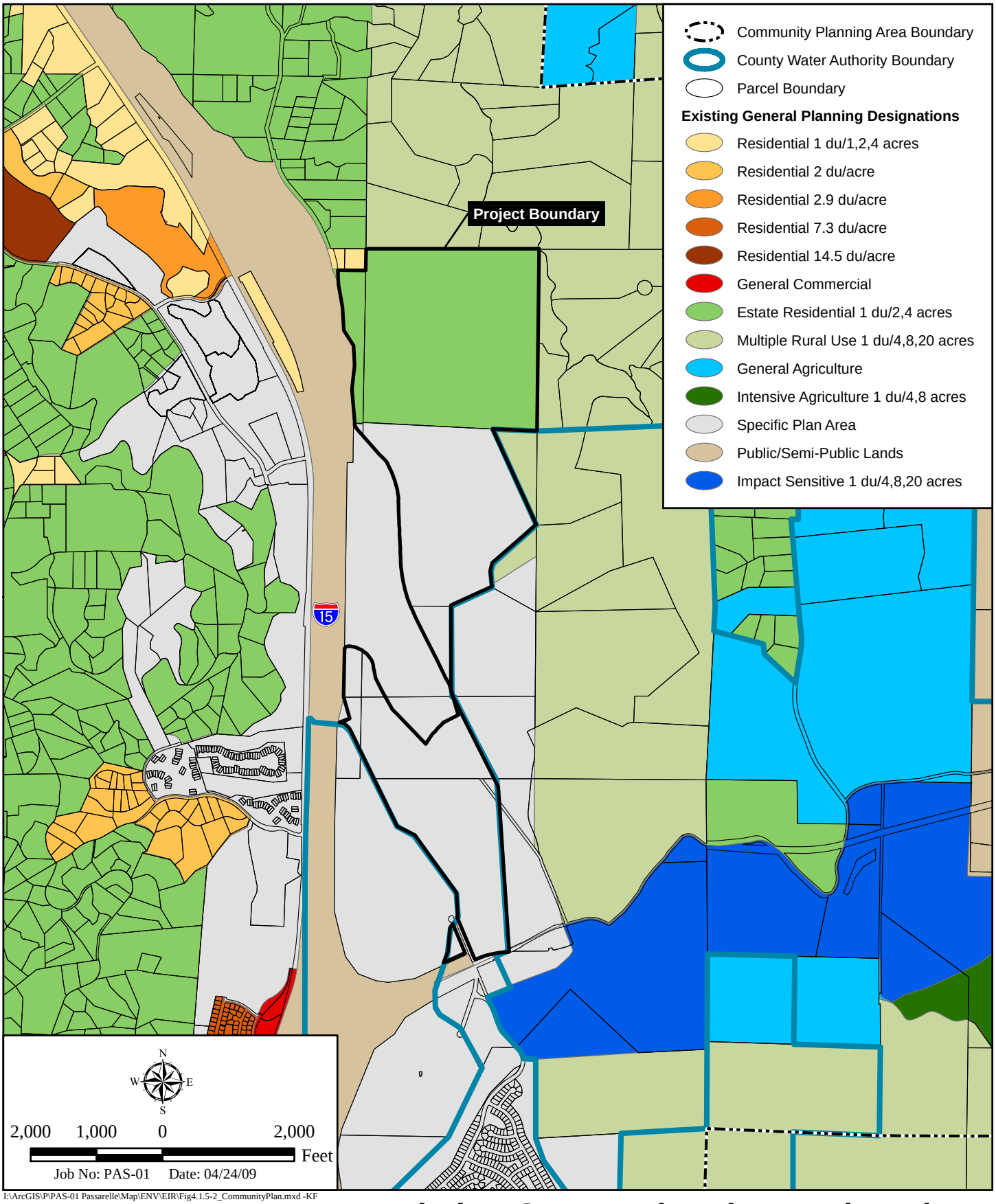
Existing Land Uses

CAMPUS PARK PROJECT

HELIX

Figure 4.1.5-1



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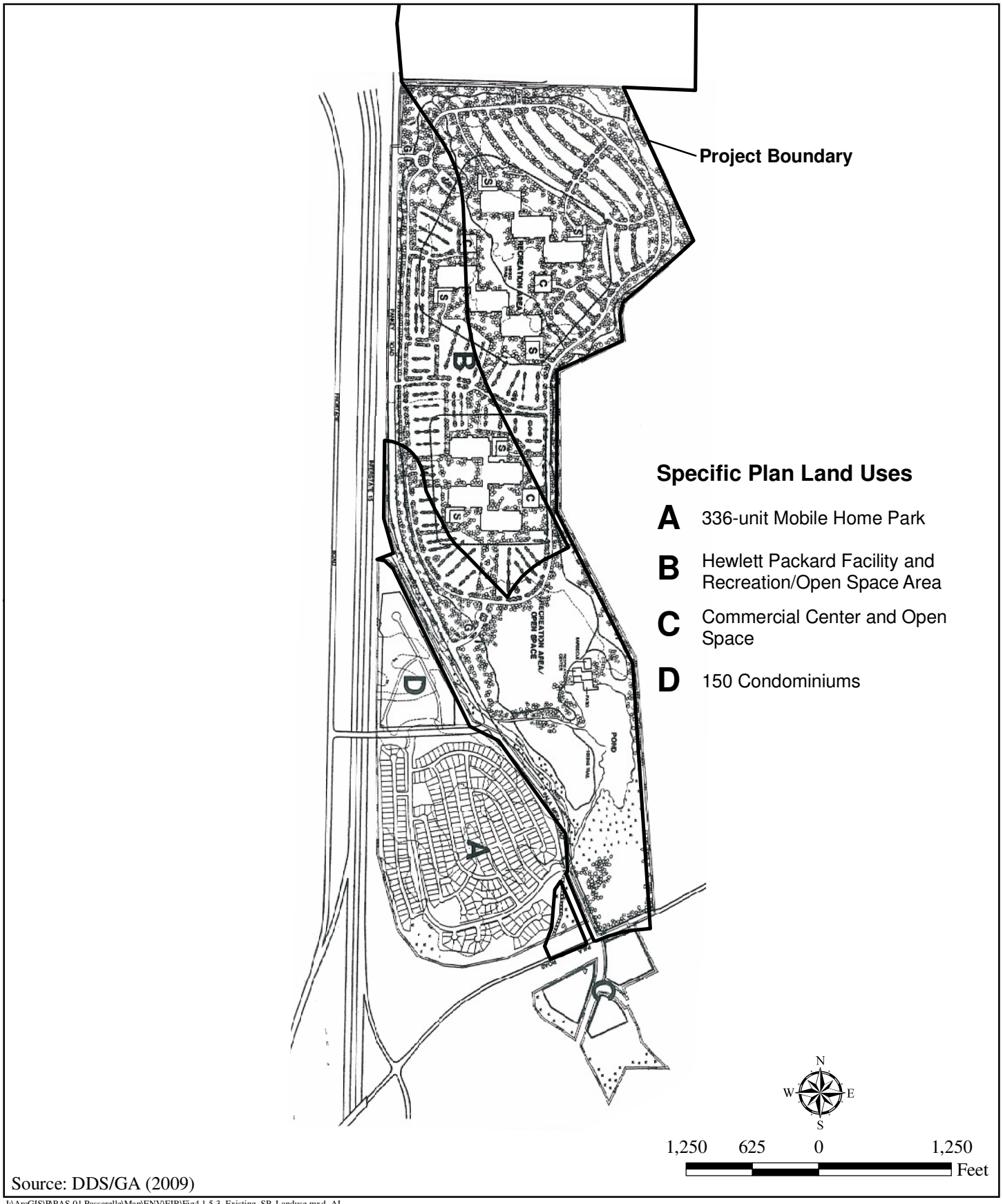
Existing Community Plan Designations

CAMPUS PARK PROJECT

HELIX

Figure 4.1.5-2



Source: DDS/GA (2009)

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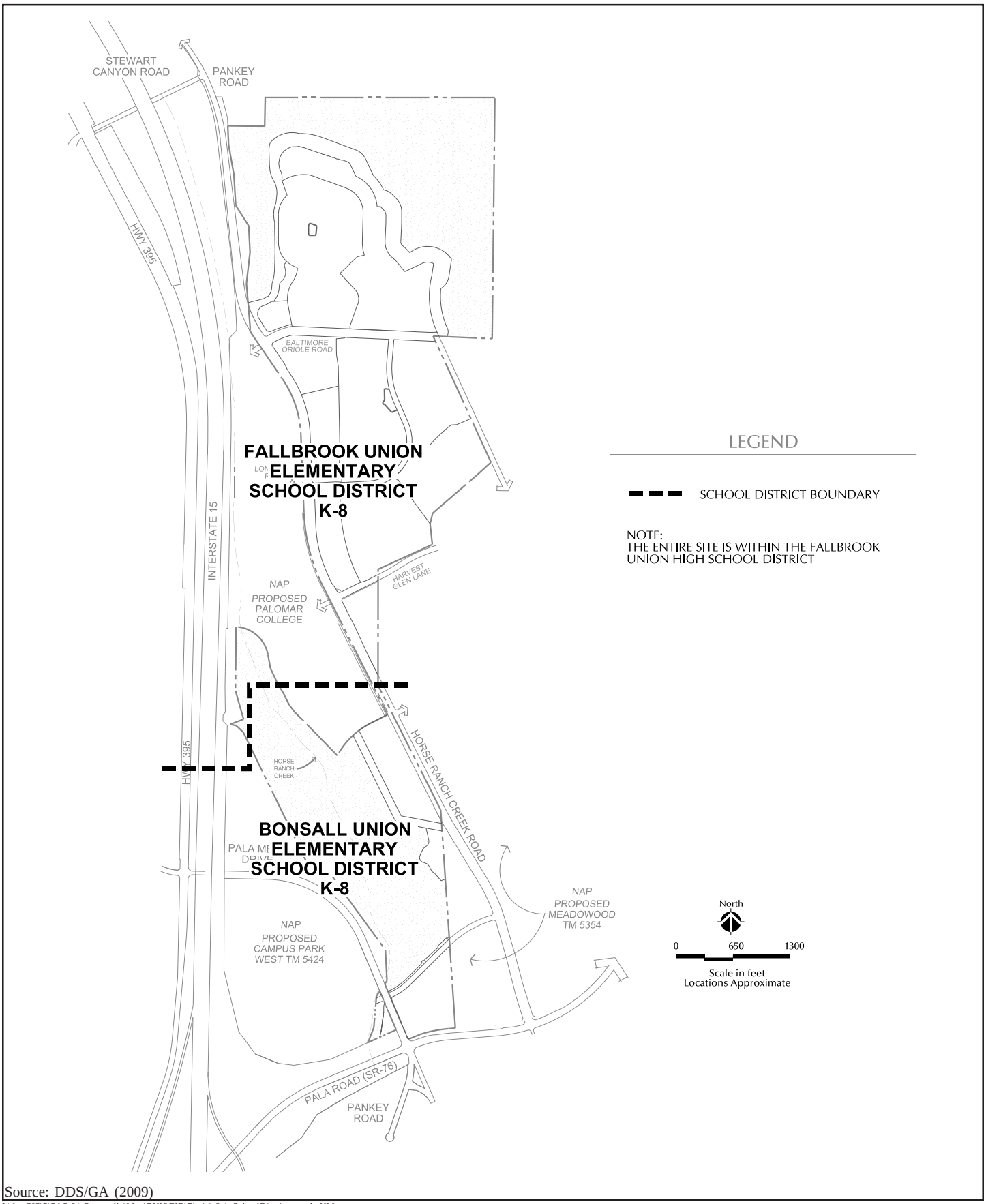
Existing Specific Plan Land Use

CAMPUS PARK PROJECT

HELIX

Figure 4.1.5-3



Source: DDS/GA (2009)

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School District Boundaries

CAMPUS PARK PROJECT

HELIX

Figure 4.1.6-1

SUBCHAPTER 4.2

EFFECTS FOUND NOT TO BE SIGNIFICANT DURING INITIAL STUDY

4.2 Effects Found Not to be Significant During Initial Study

A number of issues were found to have less than significant effects as detailed on the CEQA IS for the Project (refer to Appendix A, NOP and Comments to the NOP). Issues with effects found not to be significant are briefly discussed below, with an explanation regarding the assessed lack of significance.

4.2.1 Aesthetics – Light and Glare

The Project would use outdoor lighting and is located within Zone B as identified by the San Diego County Light Pollution Code, approximately 17 miles from Palomar Observatory. Project lighting would not adversely affect nighttime views or astronomical observations, because the Project would conform to the LPC (Sections 59.101-59.115), including the Zone B lamp type and shielding requirements per fixture and hours of operation limitations for outdoor lighting and searchlights.

In addition, the Project would control outdoor lighting and sources of glare because it would not install any of the following:

- Lighting that directly illuminates neighboring properties;
- Lighting that would cast a direct beam angle toward a potential observer, such as a motorist, cyclist or pedestrian;
- Outdoor lighting for vertical surfaces such as buildings, landscaping or signs in a manner that would result in useful light or spill light being cast beyond the boundaries of the intended area to be lit;
- Any highly reflective surfaces such as glare-producing glass or high-gloss surface color that would be visible along roadways, pedestrian walkways, or in the line of sight of adjacent properties.

The Project would not contribute to significant cumulative impacts on day or nighttime views, because it conforms to the San Diego County Light Pollution Code, which effectively addresses and minimizes the impacts of new light pollution sources. Mandatory compliance for all new building permits ensures that impacts of this Project, in combination with those of all past, present and future projects would not be cumulatively considerable. Project compliance with the Light Pollution Code, combined with the additional outdoor lighting and glare control measures detailed above would ensure that the Project's lighting impacts would be **less than significant** on either a Project or cumulative level.

4.2.2 Geology and Soils – Septic Systems

The Project does not propose to install any septic tanks or alternative wastewater disposal systems that might put a strain on the supporting capacity of surrounding soils. Instead, the Project proposes annexation to the Rainbow Municipal Water District for sewer service. Existing septic systems within the project study area shall be removed during the construction phase, pursuant to direction by the County DEH. Accordingly, **no impact** would occur.

4.2.3 Hazards – Airports, Emergency Response Plans, and Vectors

The Project site is not located within an airport land use plan, within two miles of a public airport, or within the vicinity of a private airstrip. Also, the Project does not propose construction of any structure

that is higher than 150 feet. Therefore, the Project would not constitute a flight-related safety hazard for people residing or working in the Project area; **no impact** would occur.

Development of the Project would not interfere with the Operational Area Emergency Plan in any way. It would not impair implementation of, or physically interfere with, the San Diego County Nuclear Power Station Emergency Response Plan or Oil Spill Contingency Element since the Project site is not within the 10-mile radius of the San Onofre Nuclear Generating Station, and the site is not located within the coastal zone or along the coastline. The Project does not propose altering major water or energy supply infrastructure such as the California Aqueduct, so it would not interfere with the Emergency Water Contingencies Annex and Energy Shortage Response Plan. Accordingly, **no impact** would occur.

The southern portion of the Project site is located within the Dam Inundation Zone for Lake Henshaw, as shown on Figure 4.2.3-1. Pursuant to the criteria identified in the County of San Diego Guidelines for Determining Significance – Emergency Response Plans (July 30, 2007), significant impacts related to development within dam inundation zones are associated with "unique institutions" and the related potential for "significant loss of life in the event of a dam failure…" Unique institutions are defined in the referenced guidelines to include the following types of facilities:

- Hospitals
- Schools
- Skilled nursing facilities
- Retirement homes
- Mental health care facilities
- Care facilities with patients that have disabilities
- Adult and childcare facilities
- Jails/detention facilities
- Stadiums, arenas or amphitheaters

The Proposed Project design includes a sports complex (athletic field) and may have childcare associated with office professional or Town Center uses (with none of the other unique institution categories proposed on site). These named facilities would be located outside of the dam inundation zone shown on Figure 4.2.3-1. Accordingly, impacts would be **less than significant** in association with the described Lake Henshaw dam inundation zone and related emergency evacuation plans.

Since the Project would not involve areas of permanent standing water (e.g., artificial lakes or agricultural irrigation ponds), and would not involve uses that would produce or collect animal waste (e.g., equestrian facilities, chicken coops, solid waste facility, etc.), it would not be expected to substantially increase current or future residents' exposure to vectors, including mosquitoes, rats, or flies.

4.2.4 Hydrology and Water Quality – Groundwater and Surface Water Bodies

No impact to groundwater resources is anticipated from Project implementation. The Project would obtain its water supply from the Rainbow Municipal Water District, which relies on surface reservoirs and imported water sources. The Project would not use ground water for irrigation or any other use and would not involve operations such as diversion of watercourses that could substantially interfere with groundwater recharge. Wells that previously supported historical residential and early farming use of the property have been previously removed in conjunction with well destruction permits obtained from DEH. One well remains, which currently serves the on-site existing residence. This well also would be removed (in compliance with a well destruction permit) during Proposed Project construction.

Because the Project site and vicinity are located approximately 15 miles inland and between approximately 260 and 850 feet amsl, no significant hazards related to tsunamis are anticipated. In addition, **less than significant** hazards related to seiche effects are anticipated from Project implementation because the Project site and vicinity are not located adjacent to or downslope of any large water bodies.

4.2.5 Noise – Aircraft

As noted above, the Project site is not located within a Comprehensive Land Use Plan for airports, within two miles of a public airport, or in the vicinity of a private airport. Therefore, the Project would not expose people residing or working on the Project site to excessive airport-related noise levels, and **no impact** would occur.

4.2.6 Population and Housing – Displacement

The Proposed Project would result in the demolition of one existing residence, causing the displacement of the one occupant who resides there. The Proposed Project would construct 1,076 dwelling units on the site, resulting in a net gain of 1,075 dwelling units. The elimination of one home on the Project site would have a **less than significant** impact on population and housing.

4.2.7 Recreation – Local and Regional Parks

To avoid substantial physical deterioration of local recreational facilities, the Project would provide an active sports park (8.5 acres), six neighborhood parks (totaling 1.9 acres), and community recreational facilities (1.2 acres). This would reduce any potential Project-related impacts to local recreational facilities to below a level of significance. Cumulative impacts would also be considered less than significant because all past, present, and future projects in the area are also required to comply with the Park Land Dedication Ordinance.

With regard to regional recreational facilities, there is currently an extensive surplus of publicly owned lands available for recreation, which far exceeds the General Plan standard of 15 acres per 1,000 population. Therefore, the Proposed Project would not result in substantial deterioration or accelerate the deterioration of regional parkland, and impacts would be **less than significant**. On a cumulative basis, even with the impacts of all past, present and reasonably foreseeable future projects, a significant surplus of regional recreational facilities is expected to remain.

4.2.8 Transportation/Traffic – Air Traffic and Parking

Development of the Project would not result in a change in air traffic patterns or an increase in air traffic levels resulting in substantial safety risks, since the Project site is not located within an Airport Master Plan Zone and is not in the vicinity of any public or private airports. Also, the Project would not result in inadequate parking capacity because the Project would have sufficient on-site parking spaces to be consistent with the Zoning Ordinance. **No impact** is assessed with regard to air traffic or parking.

4.2.9 Utilities and Service Systems – Solid Waste

The Project would deposit all solid waste at a County-permitted solid waste facility, in compliance with all relevant federal, state, and local statutes. Thus, any Project-related or cumulative impacts related to solid waste would be **less than significant**.

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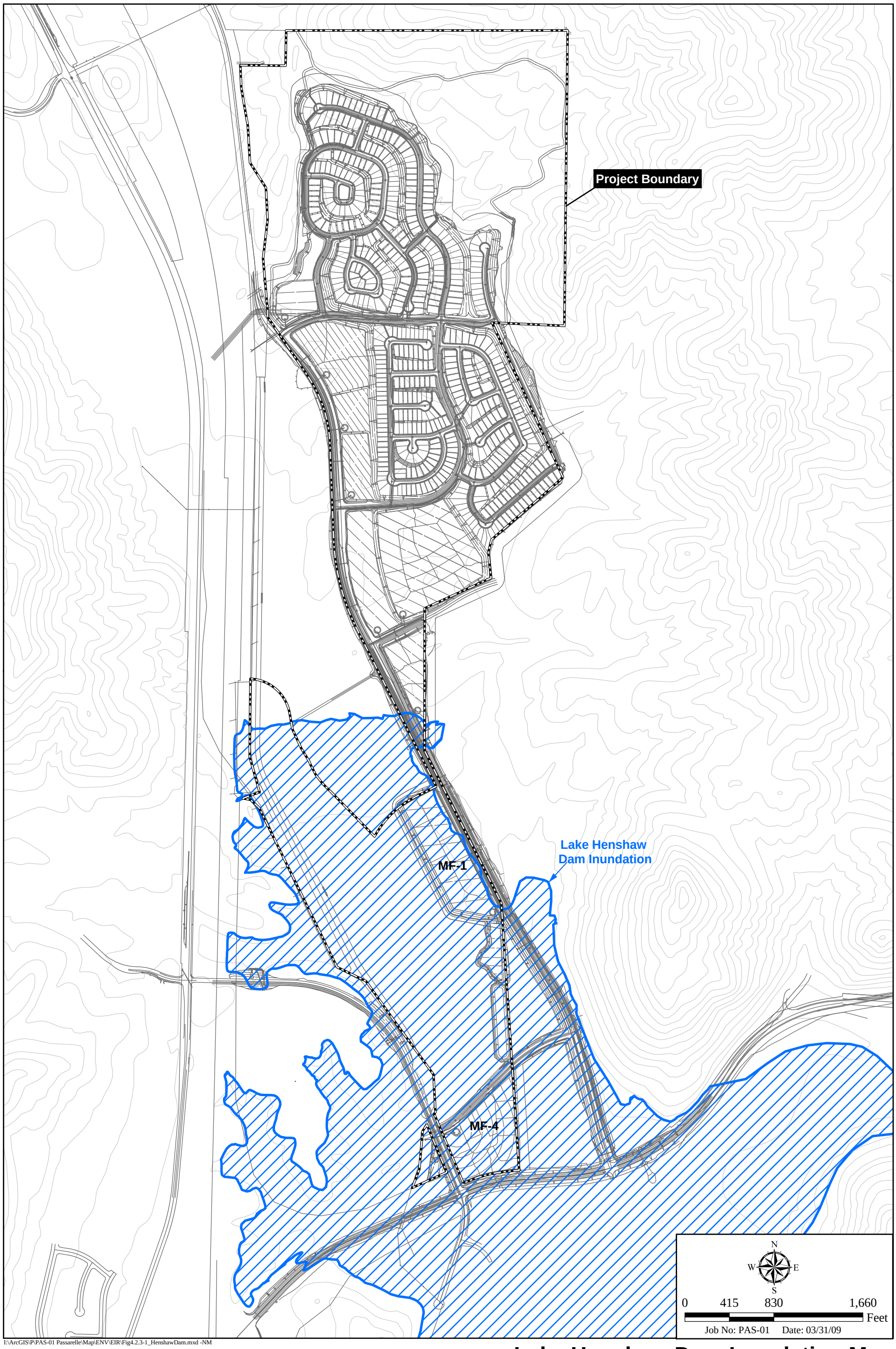

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Lake Henshaw Dam Inundation Map

HELIX

CAMPUS PARK PROJECT

Figure 4.2.3-1