Chapter 4
# Environmental Analysis

# Introduction

Sections 4.1 through 4.20 of this chapter ~~provide descriptions of existing site conditions pertaining to each of the environmental topics listed below; they~~ discuss the potential significant environmental effects resulting from project implementation, and include descriptions of existing site conditions, criteria for determining the significance of potential environmental impacts, analyses of the type and magnitude of environmental impacts, and feasible mitigation measures (MM~~), where necessary or recommended,~~) that would reduce or avoid significant environmental impacts.

## Potential Environmental Impacts

The following resource areas are analyzed in this chapter.

- 4.1, Aesthetics and Visual Resources
- 4.2, Agriculture and Forestry Resources
- 4.3, Air Quality and Health Risk
- 4.4, Biological Resources
- 4.5, Cultural Resources
- 4.6, Energy
- 4.7, Geology and Soils
- 4.8, Greenhouse Gas Emissions and Climate Change
- 4.9, Hazards and Hazardous Materials
- 4.10, Hydrology and Water Quality
- 4.11, Land Use and Planning
- 4.12, Mineral Resources
- 4.13, Noise and Vibration
- 4.14, Population and Housing
- 4.15, Public Services
- 4.16, Recreation
- 4.17, Transportation and Circulation
- 4.18, Tribal Cultural Resources
- 4.19, Utilities and Service Systems
- 4.20, Wildfire

# Format of the Environmental Analysis

Each of the 20 environmental topic sections of this chapter includes the following subsections.

## Overview

This subsection briefly describes the criteria considered in the particular resource section, summarizes the resources used to compile the information presented for the environmental analysis, and also summarizes the environmental effects of the project and any feasible mitigation measures.

## Existing Conditions

According to Section 15125 of the~~ State~~ CEQA Guidelines, an EIR must include a description of the existing physical environmental conditions in the vicinity of a project to provide the "baseline condition" against which project-related impacts are compared. Normally, the baseline condition is the physical condition that exists when the NOP is published; however, a different baseline may be used in specific cases where it is deemed appropriate. Unless otherwise indicated, the environmental setting described in each of the resource sections will be that which existed on the date the NOP was published~~.~~ (March 8, 2021).

## Applicable Laws and Regulations

This subsection provides a summary of regulations, plans, policies, and laws at the federal, state, and~~/or~~ local levels that are relevant to the project as they relate to the particular environmental resource area under discussion. Compliance with these applicable laws and regulations is mandatory unless noted otherwise within the analysis. Therefore, as it relates to the *Project Impact Analysis* below, compliance is assumed because it is required by law~~. In such cases, the underlying law or regulation requires certain actions prescribed by the regulating authority, the result of which would be an assurance that the resulting impact, if any, would be considered acceptable and "less than significant" under CEQA. Additional mitigation would therefore generally not be required.~~ , and mitigation would generally not be required when an existing law or regulation would ensure that a significant impact would not occur.

## Project Impact Analysis

This subsection describes the methodology used for the analysis of the potential environmental impacts of the project; identifies the criteria for determining the significance of potential impacts; and states a conclusion as to whether the environmental impacts would be considered~~; (a)~~ significant and unavoidable, ~~(b)~~ less than significant with mitigation incorporated, or ~~(c)~~less than significant (see definitions below). Each topic analyzed is divided into specific issues, based on potential impacts, and is separated ~~into discussions of~~by construction and operation impacts wherever relevant. The discussion of potential impacts is based on the applicable threshold~~s~~ of significance (see below) for each issue. Where potential impacts are~~ determined to be~~ significant, mitigation measures are identified, as feasible, to minimize, rectify, reduce, eliminate, or compensate for the significant impacts with the goal of reaching a less-than-significant impact determination.

## Methodology

Each methodology subsection describes the means used to analyze potential impacts on a particular resource, discussing the steps followed and listing any studies relied ~~up~~on for arriving at conclusions as to significance.

## Thresholds of Significance

Thresholds of significance are criteria used to assess whether potential environmental effects are significant. The significance criteria used in this analysis are primarily based on the recommendations provided in Appendix G of the ~~State~~ CEQA Guidelines and the County of San Diego Guidelines for Determining Significance. The thresholds of significance define the type, amount, and/or extent of impact that would be considered a significant adverse change in the environment. For some environmental topics, such as air quality and noise, the thresholds are quantitative, while those for other topics, such as visual quality, they are qualitative. The thresholds of significance are intended to assist the reader in understanding how an impact is determined to be significant.

## Project Impacts and Mitigation

The analysis of environmental impacts considers both the construction and operation of the project. As required by Section 15126.2(a) of the ~~State~~ CEQA Guidelines, direct, indirect, short-term, long-term, onsite, and/or offsite impacts are addressed, as appropriate, for the environmental issue being analyzed. This Final EIR utilizes the following terms to describe the level of significance of impacts identified during the course of the environmental analysis.

**No Impact:** This term is used when the project's construction and/or operation would have no adverse effect on a resource.

**Less than Significant:** This term is used to refer to impacts resulting from implementation of the project that are not likely to exceed the defined thresholds of significance, ~~or~~and potentially significant impacts that are reduced to a level that does not exceed the defined thresholds of significance after implementation of mitigation measures. In the latter case, the determination may also be stated as "less than significant with mitigation incorporated."

**Significant:** This term is often used to refer to impacts resulting from implementation of the project that exceed the defined thresholds of significance and can be applied before identification of any mitigation measures. A "significant effect" is defined by Section 15382 of the ~~State~~ CEQA Guidelines as "a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project including land, air, water, flora, fauna, ambient noise, and objects of historic or aesthetic significance. An economic or social change by itself shall not be considered a significant effect on the environment [but] may be considered in determining whether the physical change is significant." For impacts that exceed a threshold of significance, mitigation measures that ~~would~~ avoid or reduce the potential impact are identified, which may cause the impact to be reclassified as less than significant~~,~~ if it is sufficiently reduced, or the impact may remain significant, in which case it is referred to as a significant and unavoidable impact (or unavoidable significant impact).

**Significant and Unavoidable:** This term is used to refer to significant impacts resulting from implementation of the project that cannot be eliminated or reduced to below standards of significance through implementation of feasible mitigation measures.

**Mitigation Measures**. Section 15126.4 of the ~~State~~ CEQA Guidelines requires an EIR to "describe feasible measures which could minimize significant adverse impacts." Mitigation includes avoiding an impact altogether, minimizing impacts, rectifying impacts, reducing or eliminating impacts over time, or compensating for impacts by replacing or providing substitute resources. ~~The State~~Section 15364 of the CEQA Guidelines ~~define feasibility~~defines feasible as "capable of being accomplished in a successful manner within a reasonable period of time taking into account economic, legal, social, technological, or other considerations." This subsection lists the mitigation measures that could reduce the severity of impacts identified in the *Project Impact Analysis* subsection. Mitigation measures are the specific environmental requirements for construction or operation of the project that will be included in the Mitigation Monitoring and Reporting Program ~~(MMRP)~~ and adopted as conditions of approval of the project.

Section 4.1
# Aesthetics and Visual Resources

## 4.1.1 Overview

This section describes the visual setting of the ~~proposed~~ Alpine Park and evaluates the potential impacts from the project on scenic vistas, scenic resources, visual character, and light and glare.

### 4.1.1.1 Concepts and Terminology

The key concepts and terminology used to describe existing aesthetic and visual resource conditions, or the change in existing conditions after implementation of the project, are defined below. Although there may be more than one definition for any of the terms below, these common definitions are used for analytical consistency.

*Views* refer to visual access and obstruction, or whether it is possible to see a focal point or panoramic scene from an area. Views may be discussed in terms of *foreground*, *middleground*, and *background.* Foreground views are those immediately presented to the viewer and include objects at close range that may tend to dominate the view. Middleground views occupy the center of the viewshed and tend to include objects that are the center of attention if they are sufficiently large or visibly different from adjacent visual features. Background views include distant objects and other ~~features~~objects that make up the horizon. Objects in the background eventually fade to obscurity with increasing distance. In the context of background, the skyline or the ocean can be an important visual feature because objects above this point are highlighted against the background of the sky or water. These *skylined* elements are typically more evident to the viewer because of their inherent contrast.

*Visual quality* is evaluated based on the relative degree of vividness, intactness, and unity within a landscape, as modified by viewer preference and sensitivity. *Vividness* is the visual power or memorability of landscape components as they combine in striking and distinctive visual patterns. *Intactness* is the visual integrity of the natural and human-built landscape and its freedom from encroaching elements; this factor can be present in well-kept urban and rural landscapes, and in natural settings. *Unity* is the visual coherence and compositional harmony of the landscape considered as a whole; it frequently attests to the careful design of individual components in the landscape. High-quality views are highly vivid and relatively intact, and exhibit a high degree of visual unity. Low-quality views lack vividness, are not visually intact, and possess a low degree of visual unity (FHWA 1981).

The following additional definitions pertain to terminology used in visual analysis.

- *Aesthetics* generally refers to the identification of visual resources and the quality of what can be seen, or the overall visual perception of the environment.
- *Viewer sensitivity*, or viewer concern about noticeable changes to views, is based on the visibility of a scenic resource, proximity of viewers to the resource, relative elevation of viewers to the resource, frequency and duration of views, number of viewers, and types and expectations of the viewers. This term is defined in greater detail in Section 4.1.4.1, *Methodology*.

- *Viewshed* is all of the surface area visible from a particular location or sequence of locations (e.g., roadway or trail).

# 4.1.2 Existing Conditions

This section discusses the existing visual character and quality of the project site and the surrounding vicinity. It also identifies the existing designated visual resources, including designated scenic views and scenic highways, if applicable, that are visible from within the project site, as well as existing sources of light and glare in the project site and the vicinity.

## 4.1.2.1 Visual Character and Quality

The project site is composed of ~~approximately~~ 96.6 acres of undeveloped, vegetated rural land. The land is covered with low vegetation including grasses and shrubs, and slopes slightly from north to south. There are a series of overgrown dirt footpaths that cross the project site. There are some larger trees (Engelmann ~~O~~oaks) and shrubs along the northern boundary of the project. No structures are present, except for the electric utility poles that carry electric lines along the eastern and southeastern boundaries, where the project borders South Grade Road. Overall, the visual character is open, rural, and undisturbed natural features. The quality of the visual character is high because it is an undisturbed rural view that complements the semi-rural residential vicinity and provides an uninterrupted view of open space.

The surrounding vicinity is composed of semi-rural residential development to the north, east, and south. The residential development consists of single-family homes and accessory structures (such as barns, sheds, etc.), situated on large, ~~open~~spread-out lots set back from the roadways. The residential properties are bordered by landscaping or fencing, or are surrounded by natural vegetation. To the west of the project site is ~~Backcountry~~Back Country Land Trust's (BCLT's) Wright's Field Preserve, which consists of undeveloped conservation land with natural habitat and dirt footpaths crisscrossing the property.

## 4.1.2.2 Designated Scenic Views

The Alpine Community Plan designates Resource Conservation Areas (RCAs), which are localities identified as worthy of special efforts to protect important natural resources. RCAs are intended to inform future planning decisions and development. The criteria for selecting areas to be designated as RCAs includes "areas which provide the scenic mountainous backdrop to development within the community" (County of San Diego 2011). Fourteen RCAs are identified in the Alpine Community Plan area. The project site is located within the RCA identified as *Puetz Valley – Flinn Springs – Oak Riparian Woodland – Harbison Canyon* (see Figure 4.1-1~~).~~). The center of this RCA is located at the intersection of Arnold Way, South Grade Road, and Harbison Canyon Road, with fingers that extend to the west south of Interstate(I-) 8; to the southwest along Harbison Canyon Road; to the southeast generally along Arnold Way, South Grade Road, Tavern Road, and including a portion of the project site; and to the northeast generally following P~~e~~u~~e~~tz Valley Road. This RCA is described in the Alpine Community Plan as including oak woodland and riparian vegetation in the canyon bottom, and a gorge area at the southern end of Galloway Valley that is a highly visible landmark. Valuable resources in this RCA include habitat for the threatened Lakeside wild lilac (*Ceanothus cyaneus*) and steep rocky massive granitic outcrops that provide wildlife habitat. Additionally, the Viejas Creek

RCA is located approximately 0.38 mile to the east of the project site (see Figure 4.1-1). This RCA contains the resources of Viejas Creek and oak riparian woodlands along the streambed.

## 4.1.2.3 Scenic Highways

State Scenic Highways are designated by the California Department of Transportation (Caltrans), and usually include a freeway, highway, or roadway with distinctive natural landscape views and high aesthetic value. There are no designated State Scenic Highways in the Alpine community. The nearest designated or eligible State Scenic Highway is State Route (SR-) 125 located approximately 14 miles to the southwest of the project site. The length of I-8 that traverses through Alpine approximately 1 mile north of the project site is considered part of an eligible State Scenic Highway. This portion of I-8 is also identified as a County Designated Scenic Highway, identified as such by the County of San Diego General Plan.

The Alpine Community Plan identifies the following view corridors within the policies and goals of Chapter 5, Scenic Highways, that should be protected:

- From I-8 toward El Capitan Reservoir.
- East and west views of Viejas Mountain from I-8.
- From I-8 south along Sweetwater River.

None of the views along any of these view corridors would capture the project site.

## 4.1.2.4 Other Public Views to the Project Site

### Public Roadways and Rights-of-Way

Public views of the project site would be available from South Grade Road; the principal public viewer groups would be motorists and pedestrians within the public road right-of-way. Motorists would be able to view the project site to the west of South Grade Road for approximately 0.38 mile along the roadway. Pedestrians could also see the project site from South Grade Road; however, there currently are no sidewalks or other pedestrian facilities along the road. ~~Private views would be available from existing residential prpperties located to the east and southeast of the project site.~~

### Recreational Land Uses

Adjacently west of the project site is Wright's Field Preserve, a public hiking venue. Visitors to Wright's Field Preserve would be able to see the project site from the southern trails on the southern portion of the preserve, where it is flat and low vegetation would not block views. The trails in the northern portion of the preserve would not provide views of the project site because of the intervening hills that block easterly views.

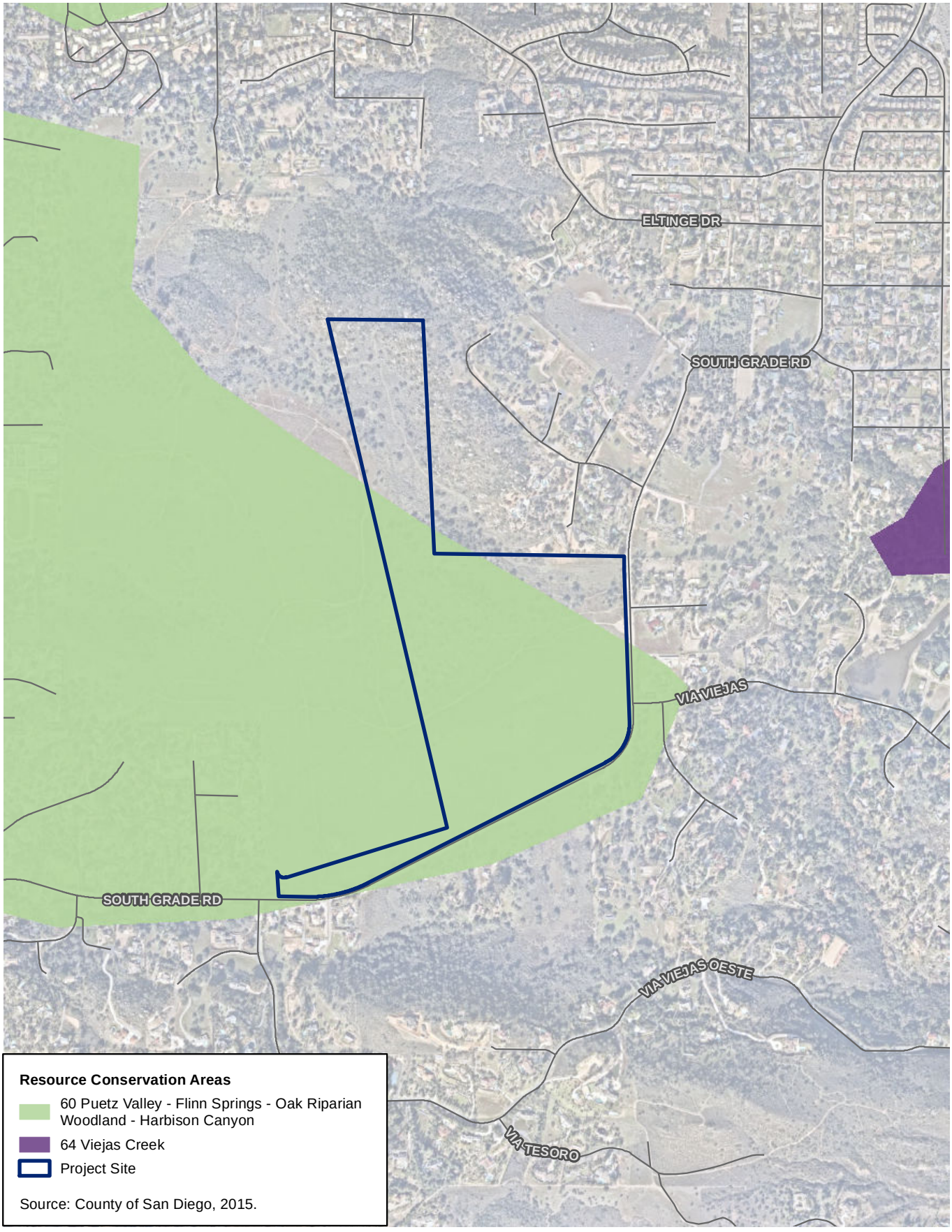


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**Figure 4.1-1**
**Resource Conservation Areas**

# 4.1.2.5 Light and Glare

There are two typical types of light intrusion. First, light emanates from the interior of structures and passes out through windows. Second, light projects from exterior sources, such as street, security, and landscape lighting. *Light spillover* is typically defined as the presence of unwanted or misdirected light on properties adjacent to the property being illuminated. Light spillover can be a nuisance to adjacent areas and can diminish views of the clear night sky.

*Glare* is described as the distraction, discomfort, or impairment of vision caused by extreme contrasts in the field of vision, where light sources such as sunlight, lamps, ~~-~~lumina~~i~~r~~i~~es, or reflecting surfaces are excessively bright in relation to the general brightness of surroundings. Glare also results from sunlight reflecting off flat building surfaces, with glass typically contributing the highest degree of reflectivity.

## On Site

### Light

There are no existing sources of light on the project site.

### Glare

There are no existing sources of glare on the project site.

## Off Site

### Light

The surrounding vicinity is designated rural or semi-rural residential, and there are minimal sources of light. There are no ~~streetlights~~street lights along South Grade Road or any adjacent cross streets. There are four decorative lights approximately 60 feet to the east of the project site that light the signs at the entrance to the Palo Verde Ranch neighborhood at the intersection of South Grade Road and Via Viejas. Other sources of offsite light would be from outdoor lighting at residences between approximately 120 ~~feet east~~ and 200 feet east or southeast of the project site, across South Grade Road.

### Glare

There are minimal sources of offsite glare in the project vicinity; the main source of glare would be from the glass or metal materials of parked or passing vehicles, such as cars, trucks, and horse trailers.

# 4.1.3 Applicable Laws and Regulations

## 4.1.3.1 State

### California Scenic Highway Program

Caltrans manages the California Scenic Highway Program, which was created in 1963 by the California legislature to preserve and protect scenic highway corridors from changes that would diminish the aesthetic value of lands adjacent to highways. The program includes a list of highways that are eligible for designation as scenic highways or that have been designated as such. A highway may be designated as scenic based on how much of the natural landscape can be seen by travelers, the scenic quality of the landscape, and the extent to which development intrudes on the traveler's enjoyment of the view. State laws governing the Scenic Highway Program are found in the Streets and Highways Code, Sections 260 through 263.

## 4.1.3.2 Local

### County of San Diego Code of Regulatory Ordinances Section 51.201, Light Pollution Code

The Light Pollution Code is intended to provide requirements for types of lighting and permitted hours of operation for outdoor lighting to minimize light pollution~~, so as~~ to allow citizens of the ~~county~~unincorporated area to view and enjoy the night environment and to protect the Palomar and Mount Laguna observatories from the detrimental effect that light pollution has on astronomical research (Section 51.201). The requirements apply to all artificial outdoor light fixtures, and regulate their location, shielding, and hours of operation.

### County of San Diego General Plan

The General Plan includes goals and policies intended to protect aesthetics and visual resources within the Land Use, Conservation and Open Space, and Housing elements. These goals and policies are summarized below.

#### Land Use Element

**Goal LU-2: Maintenance of the County's Rural Character.** Conservation and enhancement of the unincorporated County's varied communities, rural setting, and character.

**Policy LU-2.4: Relationship of Land Uses to Community Character.** Ensure that the land uses and densities within any Regional Category or Land Use Designation depicted on the Land Use Map reflect the unique issues, character, and development objectives for a Community Plan area, in addition to the General Plan Guiding Principles.

**Policy LU-2.8. Mitigation of Development Impacts.** Require measures that minimize significant impacts to surrounding areas from uses or operations that cause excessive noise, vibrations, dust, odor, aesthetic impairment and/or detrimental to human health and safety.

**Goal LU-6: Development – Environmental Balance.** A built environment in balance with the natural environment, scarce resources, natural hazards, and the unique local character of individual communities.

**Policy LU-6.7: Open Space Network.** Require projects with open space to design continuous open spaces areas that project wildlife habitat and corridors; preserve scenic vistas and areas; and connect with existing or planned recreational opportunities.

**Goal LU-10: Function of Semi-Rural and Rural Lands.** Semi-Rural and Rural Lands that buffer communities, protect natural resources, foster agriculture, and accommodate unique rural communities.

**Policy LU-10.2: Development – Environmental Resource Relationship.** Require development in Semi-Rural and Rural areas to respect and conserve the unique natural features and rural character, and avoid sensitive or intact environmental resources and hazard areas.

## Conservation and Open Space Element

**Goal COS-11: Preservation of Scenic Resources.** Preservation of scenic resources, including vistas of important natural and unique features, where visual impacts of development are minimized.

**Policy COS-11.1: Protection of Scenic Resources.** Require the protection of scenic highways, corridors, regionally significant scenic vistas, and natural features, including prominent ridgelines, dominant landforms, reservoirs, and scenic landscapes.

**Policy COS-11.2: Scenic Resource Connections.** Promote the connection of regionally significant natural features, designated historic landmarks, and points of regional historic, visual, and cultural interest via designated scenic corridors, such as scenic highways and ~~regional~~ trails.

**Policy COS-11.3: Development Siting and Design.** Require development within visually sensitive areas to minimize visual impacts and to preserve unique or special visual features, particularly in rural areas, through the following:

- Creative site planning
- Integration of natural features into the project
- Appropriate scale, materials, and design to complement the surrounding natural landscape
- -Minimal disturbance of topography
- Clustering of development so as to preserve a balance of open space vistas, natural features, and community character
- Creation of contiguous open space networks

**Policy COS-11.4: Collaboration with Agencies and Jurisdictions.** Coordinate with adjacent federal and State agencies, local jurisdictions, and tribal governments to protect scenic resources and corridors that extend beyond the County's land use authority, but are important to the welfare of County residents.

**Goal COS-12: Preservation of Ridgelines and Hillsides.** Ridgelines and steep hillsides that are preserved for their character and scenic value.

**Policy COS-12.1: Hillside and Ridgeline Development Density.** Protect undeveloped ridgelines and steep hillsides by maintaining semi-rural or rural designations on these areas.

**Policy COS-12.2: Development Location on Ridges.** Require development to preserve the physical features by being located down and away from ridgelines so that structures are not silhouetted against the sky.

**Goal COS-13: Dark Skies.** Preserved dark skies that contribute to rural character and are necessary for the local observatories.

**Policy COS-13.1: Restrict Light and Glare.** Restrict outdoor light and glare from development projects in Semi-Rural and Rural Lands and designated rural communities to retain the quality of night skies by minimizing light pollution.

### Housing Element

**Goal H-2: Neighborhoods That Respect Local Character.** Well-designed residential neighborhoods that respect unique local character and the natural environment while expanding opportunities for affordable housing.

**Policy H-2.1: Development that Respects Community Character.** Require that development in existing residential neighborhoods be well designed so as not to degrade or detract from the character of surrounding development consistent with the Land Use Element. [See applicable community plan for possible relevant policies.]

## San Diego County Scenic Highway Program

The County of San Diego ~~County~~ General Plan established the comprehensive County Scenic Highway Program, which establishes a scenic highway system priority list. Two officially designated ~~state scenic highways~~State Scenic Highways exist in ~~the county~~San Diego County, one of which is in the unincorporated ~~county~~area. The rest of the routes in the ~~c~~County's scenic highway program are listed as First, Second, or Third Priority Scenic Routes. There are 6 First Priority Routes, 16 Second Priority Routes, and 38 Third Priority Routes.

## San Diego County Zoning Ordinance

The following is a list of San Diego County Zoning Ordinances governing the management of scenic or aesthetically valuable areas, glare, and outdoor lighting.

**Sections 5200–5212, Scenic Area Regulations:** The purpose of these provisions is to regulate development in areas of high scenic value to both exclude incompatible uses and structures and to preserve and enhance the scenic resources. These provisions are applied to areas of unique scenic value including but not limited to scenic highway corridors designated by the County of San Diego ~~County~~ General Plan, critical viewshed and prime viewshed areas as designated on the Local Coastal Program Land Use Plan, and to areas adjacent to significant recreational, historic, or scenic resources, including but not limited to federal and ~~s~~State parks.

**Sections 5750–5758, Community Design Review Area Regulations:** The purpose of these provisions is to evaluate site planning, architecture, landscape design, signage, and lighting to ensure that new development is compatible with surrounding development and community goals.

These regulations provide for the maintenance and enhancement of a community's individual character and identity.

**Sections 5900–5910, Design Review Area Regulations:** The purpose of these provisions is to ensure that future structures and development of a site will complement not only the site to be developed but also the surrounding areas and existing development.

**Section 6322, Amended by Ord. No. 7110, Outdoor Lighting:** These provisions are intended to control excessive or unnecessary outdoor light emissions, which produce unwanted illumination of adjacent premises within the unincorporated area of the County of San Diego.

### Alpine Design Review Guidelines

Adopted in 1987, the purpose of Alpine's Design Review process is to encourage development that contributes to Alpine's special character and identity as a mountain village. Design review is required for all new construction or alteration in commercial, industrial, and public/semi-_public development as well as multi-family residential development zoned at a density of 7.3 or more dwelling~~s~~ units per acre occurring within the Alpine Community Plan Area boundaries. The design guidelines cover topics such as site planning principles, natural features, architectural character, visual linkages and landscaping guidelines, lighting guidelines, and signage. The guidelines also establish the design review application process and requirements.

# 4.1.4 Project Impact Analysis

## 4.1.4.1 Methodology

Aesthetic experiences can be highly subjective and vary from viewer to viewer. Whenever feasible, it is preferable to evaluate aesthetic resources using a process that strives to objectively identify the particular features of the given area, their importance, and the sensitivity of the associated viewers. The project and the potential aesthetic-related changes associated with the project are identified and qualitatively evaluated based on the extent of modification to the existing physical conditions, as well as based on the viewer sensitivity to the modifications.

Project–related changes are evaluated using the threshold criteria discussed in Section 4.1.4.2, *Thresholds of Significance*, to determine significance. It should be noted that views from private property are not considered a protected resource by the County ~~DPR~~.

### Viewer Groups and Viewer Sensitivity

The principal public viewer groups would be motorists on South Grade Road, visitors to Wright's Field Preserve, and visitors to the project site.

Viewer sensitivity is based on the visibility of a scenic resource, the proximity of viewers to the resource, the relative elevation of viewers to the resource, the frequency and duration of views, the number of viewers, and the types and expectations of the individuals and viewer groups. Generally, visual sensitivity increases as the total number of viewers, frequency, and duration of viewing activities increases.

The degree of visual sensitivity is treated as occurring at one of the following four levels.

- **High Sensitivity** suggests that the majority of the public is likely to react strongly to a ~~substantial change~~threat to visual quality. A highly concerned public is assumed to be more aware of any given level of adverse change and is substantially less tolerant than a public that has little to moderate concern. A small modification of the existing landscape may be visually distracting to a highly sensitive public and represent a substantial reduction in visual quality.
- **Moderate Sensitivity** suggests that the public would probably voice concern over substantial visual impacts. Often, the affected views are secondary in importance or are similar to others commonly available to the public.
- **Low Sensitivity** is considered to prevail where the public is expected generally to have little concern about adverse changes in the landscape, or only a small minority may be expected to voice such concern, even where the adverse change is substantial in intensity and duration.
- **No Sensitivity** occurs when the views are not public, or there are no indications of public concern over, or interest in, scenic/visual resource impacts on the affected area.

Public views were identified and assessed by reviewing street maps, Google Earth, the County of San Diego ~~County~~ General Plan, and the Alpine Community Plan. The quality of the public views was assessed by considering the features, continuity, and range of the view based on electronic photographs and photo simulations produced by AdvanceSims. Consideration was then given to how viewers of the project site would experience the project based on distance, topography of the surrounding area, and intervening vegetation or other obstacles. Because objects within the foreground have more detail, the potential sensitivity of close-in viewers~~, such as adjacent residents,~~ was considered higher than those who have more distant public views of the project site and surrounding area.

# 4.1.4.2 Thresholds of Significance

## Appendix G of the ~~State~~ CEQA Guidelines

The following significance criteria are based on Appendix G of the ~~State~~ CEQA Guidelines and provide the basis for determining the significance of impacts associated with aesthetics and visual quality resulting from the project. The determination of whether an aesthetics and visual quality impact would be significant is based on the thresholds described below and the professional judgment of ~~the~~ County DPR and the recommendations of qualified personnel at ICF, all of which is based on the evidence in the administrative record.

Impacts are considered significant if the project would result in any of the following:

1. Have a substantial adverse effect on a scenic vista.
2. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a ~~state scenic highway~~State Scenic Highway.
3. In non-urbanized areas, substantially degrade the existing visual character and quality of public views of the site and its surroundings (public views are those that are experienced from publicly accessible vantage points), or in an urbanized area, conflict with applicable zoning and other regulations governing scenic quality.
4. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

## County of San Diego Guidelines for Determining Significance

The CEQA thresholds provided by the *County of San Diego Guidelines for Determining Significance for Visual Resources and Dark Skies and Glare* (County of San Diego 2009) state that a significant impact would occur if project implementation would substantially degrade the existing visual character or quality of the site and its surroundings. The *County of San Diego Guidelines for Determining Significance for Visual Resources* (County of San Diego 2007) addresses the following questions (based on the ~~State~~ CEQA Guidelines, Appendix G, I. Aesthetics):

1. Would the project have a substantial adverse effect on a scenic vista?
2. Would the project substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a State scenic highway?
3. Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

The *County of San Diego Guidelines for Determining Significance for Dark Skies and Glare* addresses the following question (based on the ~~State~~ CEQA Guidelines, Appendix G, I. Aesthetics):

1. Would the proposed project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

# 4.1.4.3 Project Impacts and Mitigation Measures

***Threshold 1: The project <u>would not</u> have a substantial adverse effect on a scenic vista.***

## County Park and Trails and Open Space~~/Preserve~~

### Impact Discussion

The project site does not contain any designated scenic vistas. The project site is part of the RCA *Puetz Valley – Flinn Springs – Oak Riparian Woodland – Harbison Canyon* as identified by the Alpine Community Plan.

#### Construction

Construction of the project would include the use of tractors, excavators, backhoes, a water truck, a drill rig, a bobcat, a forklift, rollers, a rubber tire loader, wheel tractor scrapers, an air compressor, a generator set, a crane, and a concrete truck. Construction staging activities would occur adjacent to the project site. The presence of construction equipment would alter the views of the project site from publicly accessible areas, such as South Grade Road. The views would change from open fields covered in grass and other vegetation, to a construction site with materials, equipment, vehicles, and structures. The expansive view of the fields would be limited by the intervening equipment and materials. However, there are no designated scenic vistas on the project site, or adjacent to the project site. The project site is within the RCA as noted above; however, the specific visual resource that is identified in this RCA is the gorge at the southern end of the Galloway Valley, over 3 miles away. The view cannot be seen from the project site. Therefore, there are no designated scenic vistas that would be substantially affected by construction of the project.

#### Operation

The project site does not contain any designated scenic vistas. The project site is part of the RCA *Puetz Valley – Flinn Springs – Oak Riparian Woodland – Harbison Canyon* as identified by the Alpine Community Plan. This RCA covers an expansive area and includes both biological and visual resources. As described in Section 4.1.2.2, *Designated Scenic Views,* the specific resource that has been identified within this RCA related to scenic vistas, the gorge at the southern end of Galloway Valley, is not within the project site, and it is not visible from the project site. Therefore, implementation of the project, including the active park, trails and access roads, and open space~~/preserve~~, would not have a substantial adverse effect on a scenic vista.

### Impact Determination

The project would not result in a substantial adverse effect on a scenic vista. Impacts would be less than significant.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

Impacts would be less than significant.

***Threshold 2: The project <u>would not</u> substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a ~~state scenic highway~~<u>State Scenic Highway</u>.***

## County Park and Trails and Open Space~~/Preserve~~

### Impact Discussion

#### Construction and Operation

As described in Section 4.1.2.3, *Scenic Highways*, there are no ~~state scenic highways~~<u>State Scenic Highways</u> within the vicinity of the project site. The nearest designated or eligible State Scenic Highway is SR-125 located approximately 14 miles to the southwest, which is not visible from the project site. The portion of I-8 approximately 1 mile north of the project site is considered an eligible State Scenic Highway, as well as a County Designated Scenic Highway. The project site may be briefly visible in the distance by motorists on I-8; however, due to the intervening vegetation and hilly topography between I-8 and the project site, the project would not be discernable by the viewers. Additionally, given the residential and commercial development visible in the southern view provided by I-8, the project would be cohesive with the surrounding features within the viewshed. Lastly, the development of the project, including the active park, trails, and passive recreation features, would not damage scenic resources, including trees, outcroppings or historic resources within a ~~state scenic highway~~<u>State Scenic Highway</u> because no such resources have been identified on the project site and no such ~~state scenic highway~~<u>State Scenic Highway</u> is within or adjacent to the project site.

### Impact Determination

The project would not substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a ~~state scenic highway~~State Scenic Highway because no such resources have been identified on the project site and no such ~~state scenic highway~~State Scenic Highway is within or adjacent to the project site. Impacts would be less than significant.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

Impacts would be less than significant.

***Threshold 3: In non-urbanized areas, the project would substantially degrade the existing visual character and quality of public views of the site and its surroundings (public views are those that are experienced from publicly accessible vantage points), or in an urbanized area, conflict with applicable zoning and other regulations governing scenic quality.***

## County Park and Trails and Open Space~~/Preserve~~

### Impact Discussion

The project site is rural, open land, surrounded by semi-rural residential and rural land. Therefore, the following analysis considers if the project would substantially degrade the existing visual character and quality of public views of the site and its surroundings.

#### Construction

As mentioned in the analysis for *Threshold 1* above, project construction would require the use of numerous large pieces of equipment and vehicles. Additionally, materials would be delivered and stored on the project site. During construction~~, which is anticipated to last approximately xx months~~, the view of the project site would change drastically, from a wide-open rural field to a cluttered and busy construction site. The expansive views currently available from the ~~adjacent~~adjacently east South Grade Road and the ~~adjacentl~~adjacently west Wright's Field Preserve would be interrupted by equipment, materials, and, depending on construction phase, portions of the structures and facilities as they are being built. Although construction would be temporary, and any given piece of equipment or vehicle would not stay on the project site for the entire duration of the construction phase, the substantial change to the rural character during construction would result in a significant impact (**Impact-AES-1**).

#### Operation

Implementation of the active park would consist of numerous features that would require new structures and built facilities, including athletic courts and fields, fencing, shade structures, a playground, picnic tables, a bike ~~park~~skills area and all-wheel park, equestrian corral and staging

area, restroom building, and administrative building, and storage structures. The buildings would be designed with a ~~"~~barn-style~~"~~ architecture to complement the rural agricultural character of the surrounding area. In addition to the structures, the project would include other development elements, including parking lots, multi-use trail, sidewalks, a decomposed granite pathway, and landscaping. In the northern portion of the project site where the equestrian facilities would be developed, groves of existing oaks would remain in place, and development as well as new landscaping would be built around the existing habitat, to be compatible. The parking lots along the eastern portion of the project site would be built with an earthen berm ~~located~~in between the parking lots and South Grade Road. The 12-foot berm would be of varying height along the boundary with South Grade Road, but would generally build in height from the north to the south in order to obscure direct views of the parking lot by users of South Grade Road and adjacent residents.

All of the proposed elements would ~~contribute~~coalesce to ~~changes that would alter~~ change the visual character of the project site. The visual character would change from ~~an~~ the existing ~~perception of~~ wide-open spaces ~~and large~~of vast rural fields, to a complex ~~image~~ development of several different recreational structures and features large in scale, connected with impervious surfaces in the form of access roads, paths, and parking lots. See Figures 4.1-2 through 4.1-6 for ~~"before and after"~~ visual simulations ~~that~~developed to represent the visual ~~changes imposed by~~ impacts of the project. Figure 4.1-2 depicts the location of the viewpoints selected for visual simulations, and Figures 4.1-3 through 4.1-6 show the existing views and proposed views at each viewpoint. The recreational development and the landscaping would be more ordered than the existing natural habitat, which would result in a more urban-like visual character. The public views of the project site, available from South Grade Road and Wright's Field Preserve, would change from expansive rural views to a view of a dispersed recreational development with several different structural features. Figure 4.1-5 depicts the view from the South Grade Road at the primary park entrance, from which the administration/restroom building, garden storage, driveway, and parking lot would be visible. However, the whole project site would not be densely developed; the recreational development and structures would be ~~located~~focused in the center of the project site. With the ~~presence~~development of the proposed berm along South Grade Road, most project features would not be visible from the public viewpoint. As shown on Figure 4.1-4, the simulated view from the intersection of South Grade Road and Via Viejas, the view of the project site would ~~consist~~be entirely ~~of~~ the proposed berm, native vegetation, and trees.

The northern portion of the project site would not be developed with large structures that would cut off visual access to the open fields beyond; the only structures that might be visible from the public right-of-way to the west would be equestrian corrals, which are approximately 4 to 5 feet high and incontiguous structures that would not completely block views through the project site. ~~The~~Additionally, the equestrian area in the northern portion of the project site would be landscaped with native species and existing Engelmann ~~O~~oak trees would be left in place to provide the continuous views of natural open space that currently exist. To the southwest, views of the administration building or other small structures could be available through the intervening landscaping. See Figure 4.1-6 for the proposed view from South Grade Road adjacent to the northern end of the project site, looking southwest. Similar views would be available from approximately 300 feet of South Grade Road at the northern end of the project site.

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Source: AdvanceSims, 2021.

**Figure 4.1-2**
**Visual Simulation View Point Location Map**
**Alpine Park Project**

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Source: AdvanceSims, 2021.

**Figure 4.1-3**
**Visual Simulation View Point No. 1**
**Alpine Park Project**

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Source: AdvanceSims, 2021.

**Figure 4.1-4**
**Visual Simulation View Point No. 2**
**Alpine Park Project**

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Source: AdvanceSims, 2021.

**Figure 4.1-5**
**Visual Simulation View Point No. 3**
**Alpine Park Project**

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Source: AdvanceSims, 2021.

**Figure 4.1-6**
**Visual Simulation View Point No. 4**
**Alpine Park Project**

The southern portion of the project site would also remain open to provide views of open space and of the expansive views beyond the project site to the west and northwest. The southern portion of the project site would be developed with multi-use turf and a bike ~~park~~skills area, surrounded by native landscaping, and would not be developed with structures that would obstruct expansive views. Figure 4.1-3 depicts the proposed view from the southwestern end of the project site, facing northeast, including the secondary park entrance in the foreground and some proposed park structures in the background. Views similar to those shown on Figure 4.1-3 would still be available from approximately 1,200 feet along South Grade Road from the east and south of the southern portion of the project site.

Views of the project site from the southern portion of the trails in Wright's Field Preserve that ~~would be~~are available to ~~its visitors~~ the public would include the proposed bike ~~park~~skills area, all-wheel~~s~~ park, the nature play area, and equestrian staging areas and corrals. These project features would not include large structures that would completely obstruct views. Native landscaping would also be visible surrounding the recreational features. In the background it might be possible to see playing fields, driveways, and parking lots. Landscaping would break up the view of the development and provide a connection between the rural greenspace of the adjacent preserve and the greenspace of the playing fields. However, the view would be substantially different than the existing view of expansive rural fields. Therefore, implementation of the active park would result in a significant impact (**Impact-AES-2**).

## Impact Determination

The project would substantially degrade the existing visual character and quality of public views of the site and its surroundings. The impacts are as follows:

**Impact-AES-1: Substantially Degrade Rural Views from Public Vantage Points ~~d~~During Construction.** Construction of the project would interrupt expansive views with construction equipment and activities, ~~on a temporary basis,~~ substantially degrading the existing rural views available from South Grade Road and Wright's Field Preserve. Impacts would be significant.

**Impact-AES-2: Substantially Degrade Rural Views from Public Vantage Points During Operation.** Operation of the project would transform rural, undeveloped land to an active park with several different development features, substantially degrading the existing rural views available from South Grade Road and Wright's Field Preserve. Impacts would be significant.

## Mitigation Measures

For **Impact-AES-1:**

> **MM-AES-1: Install Screening Fences Along the Active Park Boundary.** County DPR or its contractors shall install temporary construction fence screening that is at minimum 8 feet tall. The construction fencing shall extend around the 25-acre active park boundary. The construction fencing shall be installed in phases to block views of construction equipment, materials, and ongoing construction activities, but would not block existing views that are available on the site. In this way the construction fencing would not block the entire 25-acre site at any given time. The construction fencing shall remain as long as construction activities are occurring on the project site~~.; an expected xx months.~~

For **Impact-AES-2:**

**MM-AES-2: Maintain Areas of Native Vegetation Along the Project Boundaries.** All boundaries of the Alpine Park shall be planted with areas of native vegetation to provide a transition from existing rural fields and native habitat to the landscaping and development of the County Park. Drought-tolerant and native plants shall be located along the eastern and southern boundaries along South Grade Road, on the western boundary along Wright's Field Preserve, and on the northern boundary.

### Level of Significance After Mitigation

**MM-AES-1** would reduce impacts (**Impact-AES-1**) on public views by requiring construction fence screen around the entire project site. Construction fencing would be installed in phases on the project site and would be sited only around the areas with active construction activities, equipment, and materials. Therefore, the construction fencing would allow for existing views where construction is not occurring to be visible during construction. Thus, the visual character would not be substantially ~~impaired~~degraded during construction, and the impact would be reduced to a less-than-significant level.

**MM-AES-2** would reduce impacts (**Impact-AES-2**) on public views of the project site by requiring native vegetation along the boundaries of the site to provide a transition from the surrounding rural areas. The impact would be reduced to a less-than-significant level.

***Threshold 4: The project would create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.***

## County Park and Trails and Open Space~~/Preserve~~

### Impact Discussion

#### Construction

The project site is unlit and does not have any sources of light or glare. Construction of the project would occur over 16 months and would include the following construction equipment: tractors, excavators, backhoes, a water truck, a drill rig, a bobcat, a forklift, rollers, a rubber tire loader, wheel tractor scrapers, an air compressor, a generator set, a crane, and a concrete truck.

Construction of the project would comply with the County of San Diego ~~County~~ Noise Ordinance, which limits construction activities to between the hours of 7 a.m. to 7 p.m. Monday through Saturday. ~~Therefore, there~~There would not be any nighttime construction between the hours of 7 p.m. and 7 a.m. If construction is ~~determined to be~~ necessary between sunset and 7 p.m., lighting may be required. In this case lighting would be provided in the form of shielded spotlights specifically directed at the work area, which would allow for ~~less~~little light trespass beyond the project site. ~~As stated above,~~ Additionally, this potential light source would be temporary.

Construction equipment and vehicles could result in a source of daytime glare due to sunlight reflecting off of glass or other materials. However, construction equipment would not be static; it would be moving around the construction site and would not be a permanent fixture on the project site. Therefore, potential impacts related to light and glare from construction activities would be less than significant.

### Operation

The project would include minimal outdoor lighting for security purposes. Lighting around the administration/restroom building and volunteer pad would be on timers and would be motion-sensor lights, so they would not be on continuously. Approximately five bollards would also be used to gently light certain portions of the project site; some of these would be continuous and some would be motion-sensor lighting. All permanent exterior security lighting would be installed such that lamps and reflectors ~~would~~are not ~~be~~ visible from beyond the project site~~. Also,~~ and directed lighting ~~would~~does not illuminate the nighttime sky. Illumination of the project facility and its immediate vicinity would be minimized with lighting design, location, shielding, and aim. The lighting plan ~~would comply~~complies with local policies and ordinances, including the County of San Diego Light Pollution Code, County of San Diego General Plan, and Alpine Design Review Guidelines. However, because the project would introduce numerous new lighting sources to an area that does not ~~currently~~ have any sources of light, it could result in an adverse effect on nighttime views. Introducing any sources of light could result in a substantial change to the project site because the existing conditions are dark nighttime views with no lighting on site and very little light spillover from adjacent offsite sources (**Impact-AES-3**).

Sources of ~~potential~~ glare from operation of the project would be from parked vehicles in the parking lot, and photovoltaic (PV) panels that would be installed in the parking lot mounted on overhead structures to power the outdoor lighting. Visitor or employee vehicles parked in the parking lots along the eastern portion of the project could result in glare from sunlight reflecting off the glass windshields or metal material. Generally, this phenomenon would only occur at particular times throughout the day when the sun ~~is~~was at a specific angle and would only cause a significant impact if the glare were to cause substantial damage or nuisance to the public, or create a hazard related to limited visibility due to the glare. Because visitor and employee cars would be moving throughout the day and would leave the parking lot each day, the potential glare from vehicles would change throughout the day and would be short-lived; thus, it would not result in a permanent impact.

PV panels would be mounted at the best angle to capture the most sunlight throughout the day to produce sufficient power for the electric equipment. The flat, reflective material of the PV panels could result in glare from the reflection of the sun that could cause a significant nuisance or safety hazard. However, intervening landscaping would block glare reflecting off the PV panels from reaching public viewer groups along South Grade Road. Additionally, County DPR would install PV panels with anti-reflective coatings, which reduces glare by increasing the amount of sunlight absorbed by the panel. As such, potential glare from the PV panels would be minor and would not cause a significant nuisance or safety hazard. Therefore, the project would not result in new sources of glare that would substantially affect daytime views.

## Impact Determination

The project would create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area. The impact is as follows:

**Impact-AES-3: New Source of Light Adversely Affecting Nighttime Views.** Operation of the project would result in new sources of lighting at the active park that could illuminate the nighttime sky and adversely affect nighttime views.

### Mitigation Measures

For **Impact-AES-3:**

**MM-AES-3: Turn Off Outdoor Lighting 1 Hour After Closing.** County DPR shall turn off all outdoor lighting at the parking lots, driveways, and recreational facilities in the active park 1 hour after the park closes, or use motion sensors to limit duration of lighting, except for certain lighting for safety. Outdoor lighting shall be turned on when necessary when the park is open.

### Level of Significance After Mitigation

With the implementation of **MM-AES-~~3~~43, Impact-AES-3** would be reduced to less-than-significant levels because requiring the outdoor lighting to be turned off 1 hour after closing or requiring motion-sensor lighting would remove the sources of nighttime lighting, and the project would not adversely affect nighttime views.

## 4.1.5 Summary of Significant Impacts

**Table 4.1-1. Summary of Significant Aesthetics and Visual Resources Impacts and Mitigation Measures**

| Summary of Potentially Significant Impact(s) | Summary of Mitigation Measure(s) | Level of Significance After Mitigation | Rationale for Finding After Mitigation |
|---|---|---|---|
| **Impact-AES-1: Substantially Degrade Rural Views from Public Vantage Points during Construction** | **MM-AES-1: Install Screening Fences Along the Active Park Boundary** | Less than Significant | **MM-AES-1** would reduce impacts (**Impact-AES-1**) on public views by requiring construction fence screen around the project site in phases. This would remove the views of ongoing construction while also allowing for views of the surrounding rural setting. Thus, the visual character would not be substantially degraded during construction, and the impact would be less than significant. |
| **Impact-AES-2: Substantially Degrade Rural Views from Public Vantage Points During Operation** | **MM-AES-2: Maintain Areas of Native Vegetation Along the Project Boundaries** | Less than Significant | **MM-AES-2** would reduce impacts (**Impact-AES-2**) on public views of the project site by requiring native vegetation along the boundaries of the site to provide a transition from the surrounding rural areas as well as clear sightlines through the project site to the expansive views to |

| Summary of Potentially Significant Impact(s) | Summary of Mitigation Measure(s) | Level of Significance After Mitigation | Rationale for Finding After Mitigation |
|---|---|---|---|
| | | | the west. Therefore, the project would not substantially degrade the existing public views of the rural character and the impact would be less than significant. |
| **Impact-AES-3: New Source of Light Adversely Affecting Nighttime Views** | **MM-AES-3: Turn Off Outdoor Lighting 1 Hour After Closing** | Less than Significant | With the implementation of **MM-AES-43, Impact-AES-3** would be reduced to less-than-significant levels because it will require the outdoor lighting to be turned off 1 hour after closing so that it will not adversely affect nighttime views. |

Section 4.2
# Agriculture and Forestry Resources

## 4.2.1 Overview

This section describes the existing agricultural and forestry resources present in the project area and the applicable regulations governing them, and then analyzes the potential changes to these resources that may result from implementation of the project.

## 4.2.2 Existing Conditions

~~Existing conditions regarding the~~This section discusses the existing agricultural and forestry resources within the project area~~ are described in terms of land suitability for those purposes~~ . This information is gathered primarily from the California Department of Conservation (DOC), County ~~of San Diego~~ records of County-identified agricultural resources, and the U.S. Forest Service (USFS).

### 4.2.2.1 Farmland Mapping and Monitoring Program

The DOC collects data and maps agricultural land based on soil quality, irrigation conditions, and other criteria. The best-quality land is mapped as Prime Farmland, followed by Farmland of Statewide Importance. Table 4.2-1 describes each Farmland Mapping and Monitoring (FMMP) Farmland category. Figure 4.2-1 depicts the FMMP categories mapped in the project area. 54.92 acres in the southern portion of the project area are classified as Farmland of Local Importance, and 38.32 acres in the northern portion of the project area are classified as Grazing Land, as the County of San Diego ~~has~~ mapped ~~it,~~ in 2018 (County of San Diego 2020). As shown in Figure 4.2-1, the project area does not contain any land mapped as Prime Farmland, Farmland of Statewide Importance, or Unique Farmland.

**Table 4.2-1. Farmland Mapping and Monitoring (FMMP) Farmland Categories**

| | |
|---|---|
| Prime Farmland | Farmland with the best combination of physical and chemical features able to sustain long term agricultural production. This land has the soil quality, growing season, and moisture supply needed to produce sustained high yields. Land must have been used for irrigated agricultural production at some time during the 4 years prior to the mapping date. |
| Farmland of Statewide Importance | Farmland similar to Prime Farmland, but with minor shortcomings, such as greater slopes or lesser ability to store soil moisture. Land must have been used for irrigated agricultural production at some time during the 4 years prior to the mapping date. |
| Unique Farmland | Farmland of lesser quality soils used for the production of the ~~s~~State's leading agricultural crops. This land is usually irrigated, but may include non-irrigated orchards or vineyards as found in some climatic zones in California. Land must have been cropped at some time during the 4 years prior to the mapping date. |

| | |
|---|---|
| Farmland of Local Importance | Land of importance to the local agricultural economy as determined by each county's board of supervisors and a local advisory committee. |
| Grazing Land | Land on which the existing vegetation is suited to livestock grazing. |
| Urban and Built-up Land | Land occupied by structures with a building density of at least one unit to 1.5 acres, or approximately six structures to a 10-acre parcel. This land is used for residential, industrial, commercial, construction, institutional, public administration, railroad and other transportation yards, cemeteries, airports, golf courses, sanitary landfills, sewage treatment, water control structures, and other developed purposes. |
| Other Land | Land not included in any other mapping category. Common examples include low-density rural developments; brush, timber, wetland, and riparian areas not suitable for livestock grazing; confined livestock, poultry or aquaculture facilities; strip mines and borrow pits; and water bodies smaller than 40 acres. Vacant and ~~nonagricultural~~non-agricultural land surrounded by urban development and more than 40 acres is mapped as Other Land. |

Source: California Department of Conservation 2021

## 4.2.2.2 County-Identified Agricultural Land

The definition of an *agricultural resource* within the ~~County~~unincorporated area has been broadened from the State of California's definition. County-identified agricultural resources include any land with an active agricultural operation (as defined in the County's guidelines), land that is designated and that meets the definition of an Important Farmland Category as defined in the DOC's FMMP or any vacant site with a history of agricultural production based on aerial photography or other data sources identifying agricultural land uses.

Data sources used to identify agricultural resources in San Diego County include FMMP data, California Department of Water Resources land use data, County geographic information system (GIS) vegetation data, Cleveland National Forest grazing allotments data, U.S. Department of Agriculture Statistics Service data, and Agricultural Weights and Measures Commodities data. The data are grouped into two main categories: grazing lands and croplands. The grazing lands category includes two types of land: grazing lands and field crops. The croplands category includes three agricultural land use types: intensive agriculture, orchards and vineyards, and truck crops. Table 4.2-2 describes the characteristics of each County-identified agricultural resource. As shown in Figure 4.2-2, land east of the project area along South Grade Road is classified as Local Agricultural Land, as mapped by the County of San Diego in 2018 (County of San Diego 2020).

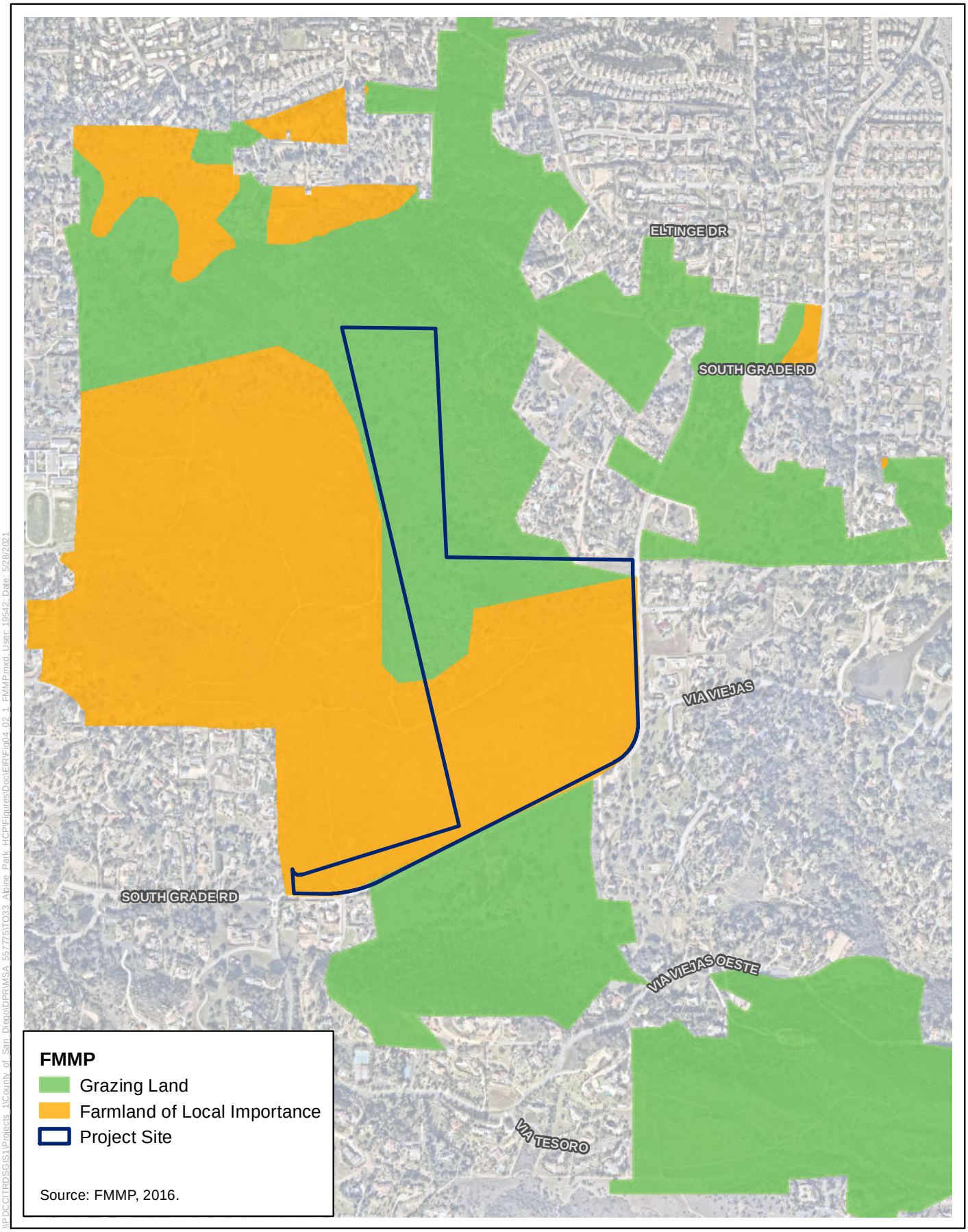


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**Figure 4.2-1**
**FMMP Categories**
**Alpine Park Project**

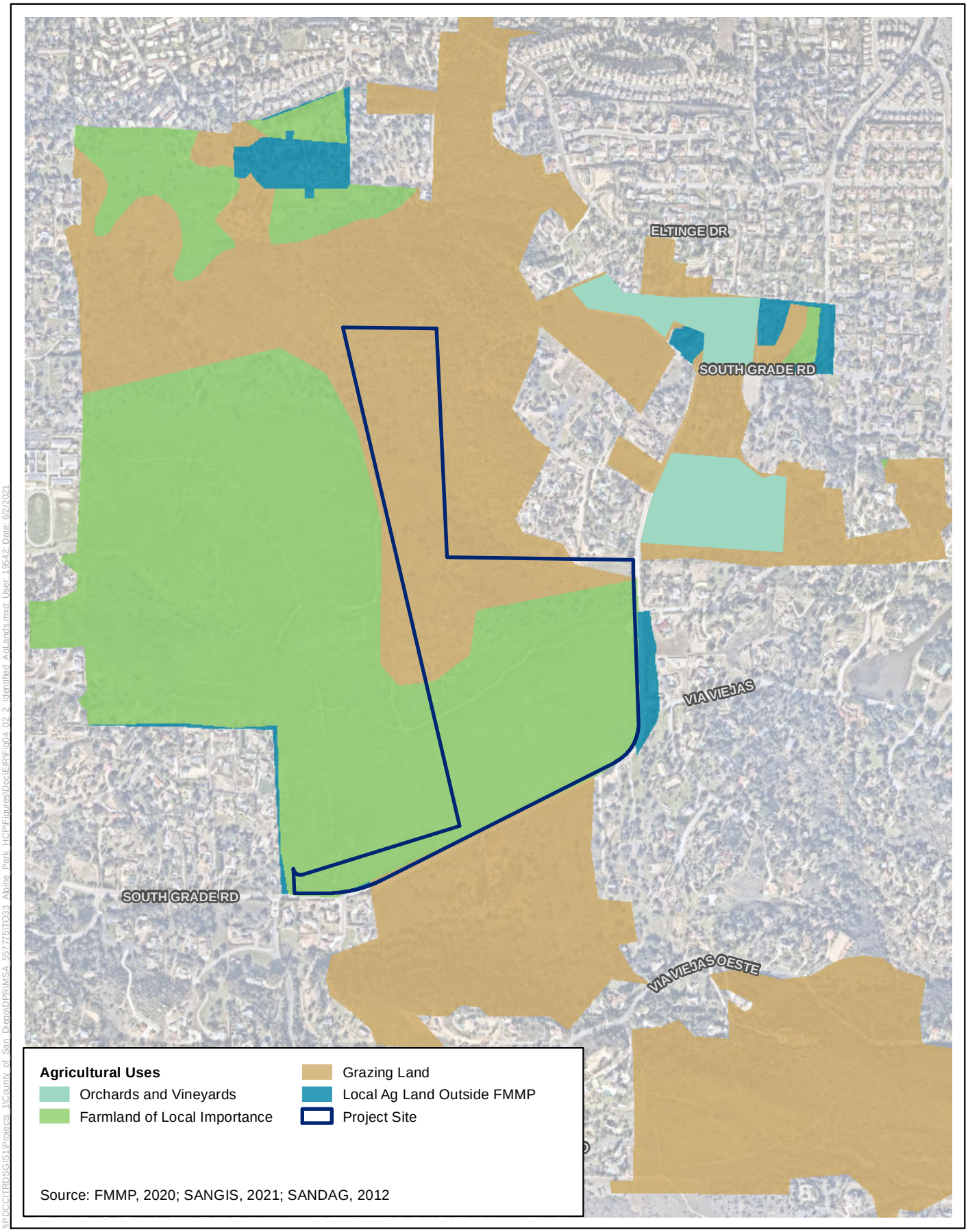


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**Figure 4.2-2**
**County Identified Agricultural Lands**
**Alpine Park Project**

**Table 4.2-2. County Agricultural Resource Categories**

| |
|---|
| **Grazing Land Category**<br>The County of San Diego ~~Department of~~ Planning ~~and Land Use (DPLU~~& Development Services (DPS) grazing land category includes grazing lands and field crops. Both field crops and grazing operations in San Diego County are economically marginal because of the lack of sufficient contiguous area with good soils, adequate rainfall, and appropriate topography. |
| **Field Crops**<br>Field crops include agriculture that requires clearing of native vegetation to plant a crop, but requires little other farm management or input. Field crops do not require the use of pesticides or irrigation infrastructure. Most field crops in ~~the~~San Diego County are dryland farmed, restricting active agricultural use of the land to the wet winter months. Field crops include alfalfa, oat, wheat, other grains, and similar crops. |
| **Grazing Lands**<br>Grazing lands occupy the greatest acreage of all agricultural land in ~~the~~San Diego County, but represent a category of low-value agricultural land use. These lands generally involve no mechanical impact on the land and require little support infrastructure. Grazing lands do not require the use of pesticides or irrigation infrastructure.<br>Grazing is a low-water-use activity reliant on natural water sources or wells. The location of grazing lands in ~~the~~San Diego County reflects this fact, with much of the identified grazing lands located east of the San Diego County Water Authority service area. |
| **Cropland Category**<br>The ~~DPLU~~PDS cropland category includes intensive agriculture, orchards and vineyards, and truck crops. Commodities included in the cropland category generally involve more permanent or severe land disturbance. |
| **Intensive Agriculture**<br>This category includes ~~semiagricultural~~semi-agricultural and incidental agricultural operations, such as chicken farms, dairies, poultry farms, and livestock feed lots. |
| **Orchards and Vineyards**<br>Orchards and Vineyards include crops such as apples, apricots, avocados, citrus fruits, and wine grapes. |
| **Truck Crops**<br>Truck crops include all indoor and outdoor greenhouse flowers, vegetable crops, and row crops, including tomatoes, strawberries, cucumbers, potatoes, celery, squash, romaine lettuce, cauliflower, and similar crops. |

Source: County of San Diego 2011

Historically, the project site has been used for agriculture; a map of the area from 1846 indicates that the property was used to grow grain (ICF 2020). Sydney and Anna Wright purchased the property in 1920 as part of a larger farm, living there until 1957. As determined through viewing aerial imagery, the project area does not currently have active agricultural operations and has not contained agricultural operations since 1953. Nearby properties formerly contained active agricultural operations; however, these operations appear to have ceased since approximately 1990 (NETR Online 2021).

## 4.2.2.3 Agricultural Soils

In general, soil quality in San Diego County is poor due to its steep terrain and erodible soils. There are various measures of soil quality, including Land Capability Classification (LCC); Storie Index (SI); prime agricultural land as defined by the Williamson Act (Government Code Section 51201); Prime

Farmland Soils and Soils of Statewide Importance as identified by FMMP; and County Prime Farmland Soil Candidate and County Statewide Important Soil Candidate. There are no FMMP Prime Soils, Statewide Significant Soils, County Prime Soils, or Statewide Significant Candidate Soils in the project area (County of San Diego 2020).

The soils mapped for the property are Bosanko stony clay, 5 to 9 percent slopes; Fallbrook rocky sandy loam, 9 to 30 percent slopes, eroded; Cienaba very rocky coarse sandy loam, 30 to 75 percent slopes; and Cienaba–Fallbrook rock sandy loams, 9 to 30 percent slopes, eroded. These soils generally support annual grasses and forbs, flattop buckwheat, chamise, California sagebrush, and oak or broadleaf chaparral (USDA 1973).

## 4.2.2.4 Agricultural Zoning and Land Use Designations

The County of San Diego Zoning Ordinance divides the unincorporated area~~s~~ of ~~the~~San Diego County into zones based on existing land uses and to regulate future land uses. Most zones allow for agricultural uses, but there are two specific agricultural zones: Limited Agriculture (A70) and General Agriculture (A72). Although neither the A70 nor A72 zones preclude other development, such as a residence, the zones allow for greater flexibility for agricultural resources. The A70 zone is intended to regulate crop production and allows for a small number of animals to be kept. The A72 zone is intended for both crops and animals.

The project site falls ~~under~~within the ~~jurisdiction~~boundaries of the Alpine Community Plan and is subject to a Semi-Rural Residential (SR-2) land use designation. Zoning for the site is A70, Limited Agricultural Use, and S80, Open Space. There are presently no active agricultural uses on site. Currently, the project site is surrounded by Wright's Field Preserve to the we~~a~~st, residential properties to the north, and South Grade Road and residential properties to the east and south.

## 4.2.2.5 Williamson Act Contract Lands

The California Land Conservation Act of 1965, known as the Williamson Act, was passed to preserve agricultural land and open spaces in California. The act provides the framework for local governments to enter into contracts with private landowners to preserve farmland and ranchland. The County ~~of San Diego~~ has set forth policies for the implementation of the Williamson Act, which authorize~~s~~d the County to establish agricultural preserves. An agricultural preserve is adopted by the County of San Diego Board of Supervisors (BOS) and designates an area devoted to agriculture, open space, recreational use, or any combination of such uses, as defined by the Williamson Act and by the County of San Diego BOS Policy I-38, *Agricultural Preserves*. An agricultural preserve must cover a minimum of 10 acres to be used for groves or croplands; for grazing land, the minimum is 80 acres; and for mixed land uses, the minimum is 40 acres. These agricultural preserves are established for the purpose of defining the boundaries of those areas within the ~~County~~unincorporated area that would be ~~willing~~able to enter into contracts pursuant to the Williamson Act. The project area is not within an agricultural preserve ~~and does not contain~~or land subject to a Williamson Act Contract (Contract) (County of San Diego 2020). ~~(See section 4.2.3.2 below for a description of Williamson Act Contract requirements.)~~

### 4.2.2.6 Forestry and Timberland Resources

The USFS defines a forested area as *forest land* if it is at least 1 acre in size and at least 10 percent occupied by forest trees of any size or formerly having had such tree cover and not currently developed for non-forest use. Non-forest uses may include cropland, pasturelands, residential areas, and other land uses. Forest land includes transition zones, which are those "areas located between heavily forested and non-forested lands that are at least 10 percent stocked with forest trees, and forest areas adjacent to urban and built-up lands" (County of San Diego 2016).

Most federal forest land is managed as the National Forest System, including the following:

- National forest lands reserved from the U.S. public domain
- National forest lands acquired through purchase, exchange, donation, or other means
- National grasslands
- Other lands, waters, or interests administered by the USFS or designated for administration through the USFS as part of the system

The California Public Resources Code (PRC) (Section 12220(g)) defines forest land as land that can support 10 percent native tree cover of any species, including hardwoods, under natural conditions, and allows for management of one or more forestry resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits.

*Timberland*, as defined by PRC section 4526, is land other than land owned by the federal government and land designated by the State Board of Forestry and Fire Protection as experimental forest land, which is available for, and capable of, growing a crop of trees of a commercial species used to produce lumber and other forest products, including Christmas trees. ~~PRC sections 51112 or 51113 (h) define~~California Government Code Section 51104(g) defines a *Timberland Production Zone* as land used for growing and harvesting timber and compatible uses.

San Diego County does not contain lands zoned specifically for forest land, timberland, or timberland production. No land under County land use jurisdiction within the project area contains any timberland resources as defined by PRC section 4526.

As identified in Figure 4.4-1, the project site contains land mapped as "Open Engelmann Oak Woodland." This woodland is mapped primarily along the northern portion of APN 404-170-63 and interspersed throughout APN 404-171-12.

## 4.2.3 Applicable Laws and Regulations

### 4.2.3.1 Federal

#### Farmland Protection Policy Act

The USDA administers the Farmland Protection Policy Act of 1981. The Act is intended to minimize the extent to which federal programs contribute to the unnecessary conversion of farmland to ~~nonagricultural~~non-agricultural uses. The act also requires these programs to be compatible with State, local, and private efforts to protect farmland.

# 4.2.3.2 State

## California Land Conservation Act (Williamson Act)

The Williamson Act was ~~enacted in ( year?) to provide~~designed as an incentive to retain prime agricultural land and open space in agricultural use, thereby slowing its conversion to urban and suburban development. The program requires a 10-year Contract between the County and the landowner. While in Contract, the land is taxed based on its agricultural use, rather than its market value. The land becomes subject to certain enforceable restrictions, and certain conditions need to be met prior to approval of an agreement. The goal of the Williamson Act is to protect agriculture and open space.

## Farmland Mapping and Monitoring Program

The FMMP, established in 1982, produces maps and statistical data used for analyzing impacts on California's agricultural resources. Agricultural land is rated according to soil quality and irrigation status, with the best quality land called Prime Farmland. Maps are updated every 2 years, with current land use information gathered from aerial photographs, a computer mapping system, public review, and field reconnaissance. The minimum mapping unit is 10 acres. DOC Prime Farmlands, Farmlands of Statewide Importance, and Unique Farmlands are referenced in the CEQA Guidelines, Appendix G, as resources to consider in an evaluation of agricultural impacts.

## California Land Evaluation Site Assessment Model (LESA)

The USDA ~~NRCS has~~Natural Resources Conservation Service (NRCS) developed the Land Evaluation Site Assessment Model (LESA) to assist State and local officials in making sound decisions about land use. Combined with forest measures and rangeland parameters, LESA can provide a technical framework to numerically rank land parcels through local resource evaluation. In determining whether impacts on agricultural resources are significant environmental effects, the CEQA Guidelines reference DOC's California agricultural LESA model as an optional methodology that may be used to assess the relative value of agriculture and farmland. The California agricultural LESA model evaluates soil-resource quality, project size, water-resource availability, surrounding agricultural lands, and surrounding protected resource lands. For a given project, the factors are rated, weighted, and combined, resulting in a single numeric score. The project score then becomes the basis for making a determination of a project's potential significance. DOC encourages local agencies to develop local agricultural models to account for the variability of local agricultural resources and conditions. An alternative approach, referred to as the Local Agricultural Resource Assessment (LARA) model, has been developed to assess the relative value of agricultural resources in San Diego County.

# 4.2.3.3 Regional

## County of San Diego General Plan

The County's General Plan provides guidance for the protection, promotion, and preservation of agriculture in San Diego County. Aspects of agriculture are discussed in the General Plan's Open Space Element, Land Use Element, Conservation Element, and Community Plans. The Open Space Element establishes goals to encourage agricultur~~al~~e use in suitable areas; foster compatibility

between agricultural and ~~nonagricultural~~non-agricultural uses; enhance the economic viability of agriculture; preserve productive agricultural areas; recognize the value of agricultural areas as open space; facilitate agricultural lands as greenbelts; and highlight the importance of a rural lifestyle. The Regional Land Use Element explains the permitted uses of the County's agricultural land use designations: (19) Intensive Agriculture and (20) General Agriculture. The emphasis of these two designations is to promote agricultural use. The Conservation Element addresses agriculture's relationship with soils, climate, drainage, water availability, and economics in the ~~County. The element~~unincorporated area. The Conservation Element established policies and action programs to monitor the agricultural conversion and analyze, improve, and promote agriculture. The Community Plans focus on the protection, promotion, and preservation of agriculture, on a community-by-community basis.

## County of San Diego BOS Policy I-38, Agricultural Preserves

~~The~~ BOS Policy I-38 sets forth policies for the implementation of the California Land Conservation Act of 1965, known as the Williamson Act. In 1965 the State Legislature added to the Government Code Sections 51200 *et. s*~~s~~*Seq*. which authorized the County to establish agricultural preserves. ~~Board~~BOS Policy I-38 identifies criteria for the establishment, modification, and disestablishment of an agricultural preserve, including processing requirements, application fees, and hearing requirements. The policy also establishes a minimum size for an agricultural preserve; requires that each preserve establish minimum ownership sizes that landowners must meet to be eligible for a Contract; requires the application of zoning regulations; establishes eligibility criteria for filing an application for an agricultural preserve and Contract with the County; and establishes criteria to cancel a Contract, including cancellation by eminent domain.

## Agricultural Clearing Permit Requirements

A County Agricultural Clearing Permit is typically required for projects involving clearing and/or removal of natural vegetation on agricultural land. The establishment of a new agricultural operation on, or the expansion of an existing operation into, any area that has not been in agricultural production for at least 1 of the preceding 5 years may also be required to obtain an agricultural clearing permit. Agriculturally related clearing within the MSCP boundary would also require an agricultural clearing permit.

## Local Agricultural Resource Assessment (LARA) Model

~~The~~ County ~~DPLU~~PDS developed the LARA model to assess the relative value of agricultural resources in the ~~County~~unincorporated area. The LARA model serves as the local agricultural model that accounts for the variability of local agricultural resources and conditions. ~~San Diego~~The County has chosen to use the LARA model to determine the importance of agricultural resources, rather than the LESA model, because the LARA model accounts for the large number of farms in the ~~County~~unincorporated area that are smaller than 10 acres in size and takes into account ~~the~~San Diego County's unique soil conditions. The LESA model does not account for agricultural resources smaller than 10 acres in size. The County uses the LARA model to determine the importance of agricultural resources in the context of discretionary land use projects. The LARA model considers soils, climate, and water as primary model factors, while also considering the presence of Contracts, other preserved lands, and existing land uses in the surrounding area. The LARA model approach to

analyzing agricultural resources is consistent with direction provided in policies of the Open Space Element of the General Plan, which states:

> When considering a subdivision request, or other development proposal, the determination of productive agricultural area shall be made based on existing agricultural uses, and on the potential for future agricultural production, and the contribution to the agricultural sector of our economy. Consideration shall be given, but shall not be limited to soil types, climate, the availability of water and its quality, and the existence of Williamson Act preserves ~~ad contracts.~~and Contracts. On-site and adjacent land use designations and zoning, ownership and parcelization patterns, as well as existing land uses, and cropping history shall all be considered.

# 4.2.4 Project Impact Analysis

## 4.2.4.1 Methodology

The project would implement the development of Alpine Park and associated trails, as well as the conservation of approximately ~~73~~70 acres of open space~~/preserve~~. The following section evaluates the effects on existing agricultural and forestry resources (as described above) should the project be implemented. Based on the existing conditions, the analysis assesses the direct and indirect impacts related to agricultural and forestry resources using the thresholds presented below.

## 4.2.4.2 Thresholds of Significance

### Appendix G of the ~~State~~ CEQA Guidelines

Based on guidance provided in Appendix G of the~~ State~~ CEQA Guidelines, the project would result in a significant impact if it would:

1. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to ~~nonagricultural~~non-agricultural use.
2. Conflict with existing zoning for agricultural use or a Williamson Act ~~c~~Contract.
3. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in PRC § 12220(g)), timberland (as defined by PRC § 4526), or timberland zoned Timberland Production (as defined by Government Code § 51104(g)).
4. Result in the loss of forest land or conversion of forest land to non-forest use.
5. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to ~~nonagricultural~~non-agricultural use or conversion of forest land to non-forest use.

### County of San Diego Guidelines for Determining Significance

As detailed in the *County of San Diego Guidelines for Determining Significance and Report Format and Content Requirements, Agricultural Resources* (County of San Diego 2005), the project would result in a significant impact if:

1. The project site has important agricultural resources as defined by the LARA Model; and the project would result in the conversion of agricultural resources that meet the soil quality criteria for Prime Farmland or Farmland of Statewide Importance, as defined by the FMMP; and as a result, the project would substantially impair the ongoing viability of the site for agricultural use.
2. The project proposes a non-agricultural land use within one-quarter mile of an active agricultural operation or land under a Williamson Act Contract (Contract) and as a result of the project, land use conflicts between the agricultural operation or Contract land and the proposed project would likely occur and could result in conversion of agricultural resources to a non-agricultural use.
3. The project proposes a school, church, day care or other use that involves a concentration of people at certain times within one mile of an agricultural operation or land under Contract and as a result of the project, land use conflicts between the agricultural operation or Contract land and the proposed project would likely occur and could result in conversion of agricultural resources to a non-agricultural use.
4. The project would involve other changes to the existing environment, which due to their location or nature, could result in the conversion of offsite agricultural resources to a non-agricultural use or could adversely impact the viability of agriculture on land under a Williamson Act Contract.
5. The project conflicts with a Williamson Act Contract (Contract) or the provisions of the California Land Conservation Act of 1965 (Williamson Act).

# 4.2.4.3 Project Impacts and Mitigation Measures

***Threshold 1: Implementation of the project <u>would not</u> convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Important Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use.***

## County Park and Trails and Open Space~~/Preserve~~

### Impact Discussion

#### Construction and Operations

The project area does not contain Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. However, the project area does contain 54.92 acres of Farmland of Local Importance, which the County of San Diego considers ~~to be~~ an agricultural resource (County of San Diego 2015). 38.32 acres of the project area is classified as Grazing Land. There are no FMMP Prime Soils, Statewide Significant Soils, County Prime Soils, or Statewide Significant Candidate Soils in the project area (County of San Diego 2020). As determined through viewing aerial imagery, the project area and surrounding areas do not currently have active agricultural operations and have not contained agricultural operations in the past (NETR Online 2021). The project would include the development of an approximately 25-acre active park and modifications to existing trails. The remainder of the project site would be conserved as open space~~/preserve~~. Although the project

would convert ~~approximately~~ 54.92 acres of Farmland of Local Importance to park and open space~~/preserve~~ uses, the site is not currently being used for agriculture and does not contain agricultural resources that meet the Prime and Statewide soil criteria, as defined by the FMMP. Therefore, impacts resulting from conversion of land to ~~nonagricultural~~non-agricultural use would be less than significant.

### Impact Determination

The project would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to a ~~nonagricultural~~non-agricultural use. No impact would occur.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

Impacts would be less than significant.

***Threshold 2: Implementation of the project would not conflict with existing zoning for agricultural use, or a Williamson Act Contract.***

## County Park and Trails and Open Space~~/Preserve~~

### Impact Discussion

#### Construction and Operations

The project site falls ~~under~~within the ~~jurisdiction~~boundaries of the Alpine Community Plan and is subject to a Semi-Rural Residential (SR-2) land use designation. Zoning for the site is A70, Limited Agricultural Use, and S80, Open Space. ~~No Williamson Act land is present within the project site.~~ The project would not change the land use designation or the zoning within the project site. ~~The County of San Diego Department of Parks and Recreation's~~County DPR's new and existing park facilities are exempt from the County's Zoning Ordinance (County of San Diego 2021). The project area is not located within an agricultural preserve or on land subject to a Williamson Act Contract (County of San Diego 2020). Therefore, the project would not conflict with existing zoning for agricultural use or a Contract, and impacts would be less than significant.

### Impact Determination

The project would not conflict with existing zoning for agricultural use or a Contract. No impact would occur.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

Impacts would be less than significant.

***Threshold 3: Implementation of the project would not conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g)).***

## County Park and Trails and Open Space~~/Preserve~~

### Impact Discussion

#### Construction and Operations

San Diego County does not contain lands zoned specifically for forest land, timberland, or timberland production. No land under County land use jurisdiction within the project area contains any timberland resources as defined by PRC section 4526. Therefore, the project would not conflict with existing zoning for, or cause rezoning of, forest land (as defined in PRC § 12220(g)), timberland (as defined by PRC § 4526), or timberland zoned Timberland Production (as defined by Government Code § 51104(g)).

### Impact Determination

The project would not conflict with existing zoning for forest land, timberland, or timberland-zoned land uses. No impact would occur.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

Impacts would be less than significant.

***Threshold 4: Implementation of the project would not result in the loss of forest land or conversion of forest land to non-forest use.***

## County Park and Trails and Open Space~~/Preserve~~

### Impact Discussion

#### Construction and Operations

As identified in Figure 4.4-1, the project site contains land mapped as "Open Engelmann Oak Woodland." This woodland is mapped primarily along the northern portion of APN 404-170-63 and interspersed throughout APN 404-171-12. However, the project would not remove any oak trees within the project area. Furthermore, the project will contribute to the preservation of "Open Engelmann Oak Woodland" and other vegetation communities within the open space~~/preserve~~ portion of the project area.

### Impact Determination

The project would not result in the loss of forest land or conversion of forest land to a non-forest use. No impact would occur.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

Impacts would be less than significant.

***Threshold 5: Implementation of the project would not involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use.***

## County Park and Trails and Open Space~~/Preserve~~

### Impact Discussion

As discussed above under Threshold 1, the project would result in the direct conversion of Farmland of Local Importance to ~~nonagricultural~~non-agricultural uses~~; however, there~~. There are no existing agricultural operations on the project site or within surrounding areas. Furthermore, the project will not remove any oak trees within the project area. Therefore, implementation of the project would not involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to ~~nonagricultural~~non-agricultural use or conversion of forest land to non-forest use.

### Impact Determination

Impacts would be less than significant.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

Impacts would be less than significant.

***Threshold 6: The project site does not have important agricultural resources as defined by the LARA Model and the project would not result in the conversion of agricultural resources that meet the soil quality criteria for Prime Farmland or Farmland of Statewide Importance, as defined by the FMMP and, as a result, the project would not substantially impair the ongoing viability of the site for agricultural use.***

## County Park and Trails and Open Space~~/Preserve~~

### Impact Discussion

As discussed above under Threshold 1, the project area does not contain Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. There are no FMMP Prime Soils, Statewide Significant Soils, County Prime Soils, or Statewide Significant Candidate Soils in the project area (County of San Diego 2020). Therefore, the project would not result in the conversion of agricultural resources that meet the soil quality criteria for Prime Farmland or Farmland of Statewide Importance, as defined by the FMMP, and the project would not substantially impair the ongoing viability of the site for agricultural use.

### Impact Determination

Impacts would be less than significant.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

Impacts would be less than significant.

***Threshold 7: The project would not propose a non-agricultural land use within one-quarter mile of an active agricultural operation or land under a Williamson Act Contract (Contract) and as a result of the project, land use conflicts between the agricultural operation or Contract land and the ~~proposed~~ project would not occur and would not result in conversion of agricultural resources to a non-agricultural use.***

## County Park and Trails and Open Space~~/Preserve~~

### Impact Discussion

As discussed above under Threshold 2, the project would not conflict with a Contract. Additionally, the project would not propose a non-agricultural land use within one-quarter mile of an active agricultural operation or land under a Contract. Therefore, land use conflicts between an agricultural operation or Contract land and the project would not occur and would not result in conversion of agricultural resources to a non-agricultural use.

### Impact Determination

Impacts would be less than significant.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

Impacts would be less than significant.

***Threshold 8: The project would not propose a school, church, day care, or other use that involves a concentration of people at certain times within one mile of an agricultural operation or land under Contract and, as a result of the project, land use conflicts between the agricultural operation or Contract land and the ~~proposed~~ project would not occur and would not result in conversion of agricultural resources to a non-agricultural use.***

## County Park and Trails and Open Space~~/Preserve~~

### Impact Discussion

The project does not propose a school, day care, or other use that involves a concentration of people at certain times within 1 mile of an agricultural operation or land under Contract. Therefore, implementation of the project would not result in land use conflicts between agricultural operation or Contract land and the project, and the project would not result in conversion of agricultural resources to a non-agricultural use.

### Impact Determination

Impacts would be less than significant.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

Impacts would be less than significant.

***Threshold 9: The project would not involve other changes to the existing environment, which due to their location or nature, could result in the conversion of offsite agricultural resources to a non-agricultural use or could adversely impact the viability of agriculture on land under a Williamson Act Contract.***

### County Park and Trails and Open Space~~/Preserve~~

#### Impact Discussion

As discussed above under Threshold 1, the project would not result in the direct conversion of Farmland of Local Importance to ~~nonagricultural~~non-agricultural uses. There are no existing agricultural operations on the project site or within surrounding areas. As discussed above under Threshold 5, the project would not involve other changes in the existing environment that, due to their location or nature, could result in conversion of Farmland to ~~nonagricultural~~non-agricultural use. As discussed above under Threshold 2, the project area is not within an agricultural preserve or on land subject to a Contract (County of San Diego 2020). Therefore, implementation of the project would not involve other changes in the existing environment that, due to their location or nature, could result in the conversion of offsite agricultural resources to a non-agricultural use or could adversely affect the viability of agriculture on land under a Contract.

#### Impact Determination

Impacts would be less than significant.

#### Mitigation Measures

No mitigation is required.

#### Level of Significance After Mitigation

Impacts would be less than significant.

## 4.2.5 Summary of Significant Impacts

There would be no significant impacts on agriculture or forestry resources.

Section 4.3
# Air Quality

## 4.3.1 Overview

This section describes the regulatory and environmental setting for air quality, discusses local and regional air quality impacts that would result from the project and its elements, determines ~~the~~ significance of impacts, and provides mitigation measures that would reduce these impacts, where feasible. The project area is the study area for air quality. Please refer to Section 4.8, *Greenhouse Gas Emissions and Climate Change*, for a discussion of greenhouse gas (GHG) emissions. This section is based on ~~State~~ CEQA Guidelines Appendix G and the County ~~of San Diego~~ Guidelines for Determining Significance for Air Quality.

## 4.3.2 Existing Conditions

The project is located in the San Diego Air Basin (SDAB), which covers the entirety of ~~San Diego~~the County. The ~~San Diego~~ County Air Pollution Control District (SDAPCD) is the local agency responsible for the administration and enforcement of air quality regulations in ~~the county.~~San Diego County. Ambient air quality in the study area is affected by climatological conditions, topography, and the types of pollutants emitted and the amounts. The primary factors that influence ambient concentrations of air pollutants are the locations of emission sources and the amount of pollutants emitted from those sources. Meteorological and topographical conditions are also important—atmospheric conditions, such as wind speed, wind direction, and air temperature gradients, interact with the physical features of the landscape to determine the movement and dispersal of air pollutants. The following discussion describes relevant characteristics of the SDAB, describes key pollutants of concern, summarizes existing ambient pollutant concentrations, and identifies sensitive receptors.

### 4.3.2.1 Climate and Atmospheric Conditions

#### Regional

The climate of ~~San Diego~~the County is classified as Mediterranean but is incredibly diverse because of the topography. The climate is dominated by the Pacific High pressure system that results in mild, dry summers and mild, wet winters. ~~San Diego~~The County experiences an average of 201 days above 70°F and 9–13 inches of rainfall annually (mostly from November through March). El Niño and La Niña patterns have large effects on the annual rainfall received in ~~San Diego~~the County (SDAPCD 2021a).

An El Niño is a warming of the surface waters of the eastern Pacific Ocean. It is a climate pattern that occurs across the tropical Pacific Ocean that is associated with drastic weather occurrences, including enhanced rainfall in Southern California. La Niña is a term for cooler than normal sea surface temperatures across the Eastern Pacific Ocean. ~~San Diego~~The County receives less than normal rainfall during La Niña years (SDAPCD 2021a).

The Pacific High drives the prevailing winds in the SDAB. The winds tend to blow onshore in the daytime and offshore at night. In the summer, an inversion layer is created over the coastal areas and increases the ozone ($O_3$) levels. In the winter, ~~San Diego~~the County often experiences a shallow inversion layer that tends to increase carbon monoxide (CO) and fine particulate matter ($PM_{2.5}$) concentration levels due to the increased use of residential wood burning (SDAPCD 2021a).

In the fall months, the SDAB is often impacted by Santa Ana winds. These winds are the result of a high-pressure system over the Nevada-Utah region that overcomes the westerly wind pattern and forces hot, dry winds from the east to the Pacific Ocean. These winds are powerful and incessant. They blow the air basin's pollutants out to sea. However, a weak Santa Ana can transport air pollution from the South Coast Air Basin and greatly increase the San Diego $O_3$ concentrations. A strong Santa Ana also primes vegetation for firestorm conditions (SDAPCD 2021a).

### Local

Climate data from the Alpine monitoring station (COOP 040136) was used to characterize the varying climate conditions near the project site. According to climate data recorded from 1951 to 2016, the average annual maximum temperature in the area is 76.4°F, and the average annual minimum temperature is 50.3°F (WRRC 2021). The average precipitation in the area is approximately 16.15 inches annually. The project site is in the vicinity of the wind monitoring station at Gillespie Field Airport, which is approximately 12.4 miles west of the project site. Wind patterns at the Gillespie Field station indicate a prominence of westerly winds that average 4.4 miles per hour (CARB 2021a).

## 4.3.2.2 Pollutants of Concern

### Criteria Pollutants

Concentrations of $O_3$, CO, nitrogen dioxide ($NO_2$), sulfur dioxide ($SO_2$), lead (Pb), and particulate matter (PM) are commonly used as indicators of ambient air quality conditions. These pollutants are known as *criteria pollutants* and are regulated by the U.S. Environmental Protection Agency (EPA) and California Air Resources Board (CARB) through National Ambient Air Quality Standards (NAAQS) and California Ambient Air Quality Standards (CAAQS), which are discussed further in Section 4.3.3, *Applicable Laws and Regulations*.

All criteria pollutants can have human health and environmental effects at certain concentrations. The NAAQS and CAAQS for these pollutants are set to protect public health and the environment within an adequate margin of safety. The following discussion presents additional information on the possible health and environmental effects from exposure to the primary criteria pollutants generated by the project.

#### Ozone

Ozone, a component of urban "~~smog,~~", is ~~a~~ photochemical oxidant that is formed when volatile organic compounds (VOCs) (also known as reactive organic gases [ROGs]) and oxides of nitrogen ($NO_X$)—both byproducts of the internal combustion engine—react with sunlight. VOCs are compounds made up primarily of hydrogen and carbon atoms. Internal combustion associated with motor vehicle usage is the major source of hydrocarbons (HC). Other sources of VOCs are emissions associated with the use of paints and solvents, the application of asphalt paving, and the use of

household consumer products such as aerosols. The two major forms of $NO_X$ are nitric oxide (NO) and ~~nitrous oxide,(or nitrogen dioxide) ($NO_2$).~~ $NO_2$. NO is a colorless, odorless gas formed from atmospheric nitrogen and oxygen when combustion takes place under high temperature and/or high pressure. $NO_2$ is a reddish-brown irritating gas formed by the combination of NO and oxygen. In addition to serving as an integral participant in ozone formation, $NO_X$ also directly acts as an acute respiratory irritant and increases susceptibility to respiratory pathogens.

Ozone poses a higher risk to those who already suffer from respiratory diseases (e.g., asthma), children, older adults, and people who are active outdoor. Exposure to ozone at certain concentrations can make breathing more difficult, cause shortness of breath and coughing, inflame and damage the airways, aggregate lung diseases, increase the frequency of asthma attacks, and cause chronic obstructive pulmonary disease. Studies show associations between short-term ozone exposure and non-accidental mortality, including deaths from respiratory issues. Studies also suggest long-term exposure to ozone may increase the risk of respiratory-related deaths (EPA 2021a). The concentration of ozone at which health effects are observed depends on an individual's sensitivity, level of exertion (i.e., breathing rate), and duration of exposure. Studies show large individual differences in the intensity of symptomatic responses, with one study finding no symptoms to the least responsive individual after a 2-hour exposure to 400 parts per billion (ppb) of ozone and a 50% decrement in forced airway volume in the most responsive individual. Although the results vary, evidence suggests that sensitive populations (e.g., asthmatics) may be affected on days when the 8-hour maximum ozone concentration reaches 80 ppb (EPA 2021b).

In addition to human health effect~~s~~, ozone has been ~~l~~t~~i~~nk~~ed~~ to crop damage, typically in the form of stunted growth, leaf discoloration, cell damage, and premature death. Ozone can also act as a corrosive and oxidant, resulting in property damage such as the degradation of rubber products and other materials.

**Organic Gases—Precursors to Ozone** include ROGs and VOCs. HCs are organic gases that are formed solely of hydrogen and carbon. ROGs include all HC~~s~~ except those exempted by CARB. VOCs are similar to ROGs in that they include all organic gases except those exempted by federal law. Both VOCs and ROGs are emitted from incomplete combustion of HC~~s~~ or other carbon-based fuels. Combustion engine exhaust, oil refineries, and oil-fueled power plants are the primary sources of HC~~s~~. Another source of HC~~s~~ is evaporation from petroleum fuels, solvents, dry cleaning solutions, and paint. Generally speaking, and in this analysis, ROGs and VOCs are used interchangeably to refer to the HC~~s~~ that are a precursor to $O_3$ formation.

## Carbon Monoxide

CO is a colorless, odorless, toxic gas produced by incomplete combustion of carbon substances, such as gasoline or diesel fuel. In the study area, high CO levels are of greatest concern during the winter, when periods of light winds combine with the formation of ground-level temperature inversions from evening through early morning. These conditions trap pollutants near the ground, reducing the dispersion of vehicle emissions. Moreover, motor vehicles exhibit increased CO emission rates at low air temperatures. The primary adverse health effect associated with CO is interference with normal oxygen transfer to the blood, which may result in tissue oxygen deprivation. Exposure to CO at concentrations above the CAAQS or NAAQS (see Table 4.3-2) can also cause fatigue, headaches, confusion, dizziness, and chest pain. There are no ecological or environmental effects from ambient CO (CARB 2021b).

## Nitrogen Dioxide

$NO_2$, is a reddish-brown gas, formed by the combination of NO and oxygen through internal combustion. Long-term exposure to $NO_2$ can aggregative respiratory diseases, such as asthma, leading to increased hospital admissions (EPA 2021c). Controlled studies demonstrate effects (airway reactivity) among asthmatics at a short-term (less than 3 hours) exposure to 0.3 parts per million (ppm) $NO_2$. Effects among healthy individuals occurred at high levels of exposure (1.5–2 ppm) (McConnell et al. 2002). For reference, the 1-hour CAAQS for $NO_2$ is 0.18 ppm (see Table 4.3-2). In additional to human health effects, $NO_2$ can also reduce visibility and react with water, oxygen, and other chemicals to contribute to acid rain, which can harm sensitive ecosystems (EPA 2021c).

## Particulate Matter

Particulate matter consists of finely divided solids or liquids such as soot, dust, aerosols, fumes, and mists. Two forms of fine particulates are now regulated—inhalable coarse particles ($PM_{10}$), and inhalable fine particles ($PM_{2.5}$). Particulate discharge into the atmosphere results primarily from industrial, agricultural, construction, and transportation activities. However, wind on arid landscapes also contributes substantially to local particulate loading. Additionally, secondary formation of PM, primarily in the form of fine particulate, occurs through the chemical transformation of precursors such as $NO_X$, $SO_2$, ammonia, and VOCs.

Particulate pollution can be transported over long distances and may adversely affect humans, especially people who are naturally sensitive or susceptible to breathing problems. Numerous studies have linked PM exposure to premature death in people with preexisting heart or lung disease. Other symptoms of exposure may include nonfatal heart attacks, irregular heartbeat, aggravated asthma, decreased lun~~ch~~g function, and increased respiratory symptoms. Exposure to concentrations of PM above the current ambient air quality standards may result in these health effects (EPA 2021d~~).~~). Similar to $O_3$, the elderly and those with preexisting heart and lung diseases are at greater risk to the harmful effects of PM exposure. Children are also at increased risk because they breathe faster than adults, and therefore inhale more air per pound of body weight and tend to spend more time outdoors. The CAAQS and NAAQS for PM are set to protect these sensitive populations and define the number of particles that can be present in outdoor air without threatening the health of infants, children, or the elderly (CARB 2021d). The CAAQS and NAAQS for PM are shown in Table 4.3-2.

Depending on their compositions, both $PM_{10}$ and $PM_{2.5}$ can also affect water quality and acidity, deplete soil nutrients, damage sensitive forests and crops, affect ecosystem diversity, and contribute to acid rain (EPA 2021d).

## Sulfur Dioxide

$SO_2$ is a product of fuel combustion. The predominant source of $SO_2$ emissions within ~~the county~~San Diego County is mobile source fuel combustion, primarily from aircraft, ocean going vessels, and on-road vehicles. In recent years emissions of $SO_2$ have been significantly reduced by the increasingly stringent controls placed on the sulfur content of fuels used in stationary sources and mobile sources. $SO_2$ is a precursor to fine PM formation in the form of sulfates, such as ammonium sulfate. Short-term exposure to $SO_2$ can aggravate the respiratory system, making breathing difficult. Controlled laboratory studies indicate that brief exposure (5 to 10 minutes) of exercising asthmatics to an average $SO_2$ level of 0.4 ppm can result in increases in air resistance. Healthy adults do not

show any symptoms to $SO_2$ at levels as high as 1 ppm, even after up to 3 hours of exposure. Based on the concentration needed to protect sensitive individuals (e.g., asthmatics), CARB and EPA have adopted the CAAQS and NAAQS for $SO_2$ (see Table 4.3-2) (SCAQMD 2017). In addition to public health impacts, $SO_2$ can also affect the environment by damaging foliage and decreasing plant growth (EPA 2021e).

### Lead

Lead is a soft metal that was previously added to gasoline and emitted to the environment through motor vehicle exhaust. Since lead was removed from gasoline, emissions have declined, and the primary source of emissions is now metal processing facilities and leaded aviation gasoline. Lead can also be resuspended into the air when contaminated soil or paints are disturbed. Lead emissions can be inhaled and ingested, leading to accumulation of lead particles in bone. Lead exposure can lead to cognitive function decrements, behavioral problems, kidney and heart disease, decreased immunity and red blood cell counts, and reproductive and developmental effects (CARB 2021e).

## Toxic Air Contaminants

In addition to the criteria pollutants discussed above, toxic air contaminants (TACs) are another group of pollutants of concern. Some examples of TACs include benzene, butadiene, formaldehyde, and hydrogen sulfide. Potential TAC-related health effects include birth defects, neurological damage, cancer, and death. There are hundreds of different types of TACs, with varying degrees of toxicity. Individual TACs vary greatly with respect to the health risk they present; at a given level of exposure, one TAC may pose a hazard that is many times greater than another.

TACs do not have ambient air quality standards but are regulated by the EPA and CARB. In 1998, CARB identified particulate matter from diesel-fueled engines as a TAC. CARB completed a risk management process that identified potential cancer risks for a range of activities and land uses that are affected by the use of diesel-fueled engines (CARB 2000a). High-volume freeways, stationary diesel engines, and facilities that attract constant and heavy volumes of diesel vehicle traffic (e.g., distribution centers, truck stops) were identified as areas that pose the highest risk for adjacent receptors. Other facilities associated with increased risk include warehouse distribution centers, large retail or industrial facilities, high-volume transit centers, and schools with a high volume of bus traffic. Health risks from TACs are a function of both the concentration and the duration of exposure. The primary TAC of concern associated with the project is diesel particulate matter (DPM) emissions during construction.

DPM is generated by diesel-fueled equipment and vehicles. CARB estimated that about 70% of the total known cancer risk related to air toxics is attributable to DPM (CARB 2021c). Short-term exposure to DPM can cause acute irritation (e.g., eye, throat, and bronchial), neurophysiological symptoms (e.g., lightheadedness and nausea), and respiratory symptoms (e.g., cough and phlegm). The EPA (2002) has determined that diesel exhaust is "likely to be carcinogenic to humans by inhalation".

# 4.3.2.3 Existing Air Quality Conditions

The Clean Air Act (CAA) requires the EPA to designate areas within the country as either attainment or nonattainment for each criteria pollutant based on whether ~~the~~ NAAQS have been achieved. Similarly, the California CAA requires CARB to designate areas within California as either attainment

or nonattainment for each criteria pollutant based on whether the CAAQS have been achieved. If a pollutant concentration is lower than the ~~s~~State or federal standard, the area is classified as being in attainment for that pollutant. If a pollutant violates the standard, the area is considered a nonattainment area. If data are insufficient to determine whether a pollutant is violating the standard, the area is designated unclassified.

Under the California CAA, areas are designated as nonattainment for a pollutant if air quality data show that a ~~s~~State standard for the pollutant was violated at least once during the previous three calendar years. Exceedances that are affected by highly irregular or infrequent events are not considered violations of a ~~s~~State standard and are not used as a basis for designating areas as nonattainment. The attainment status of ~~San Diego~~the County is summarized in Table 4.3-1.

**Table 4.3-1. Federal and State Attainment Status for San Diego County**

| Criteria Pollutant | Federal Designation | State Designation |
|---|---|---|
| Ozone ($O_3$) (8-hour) | Nonattainment | Nonattainment |
| Carbon Monoxide (CO) | Attainment | Attainment |
| Respirable Particulate Matter ($PM_{10}$) | Unclassifiable/Attainment[1] | Nonattainment |
| Fine Particulate Matter ($PM_{2.5}$) | Attainment | Nonattainment |
| Nitrogen Dioxide ($NO_2$) | Attainment | Attainment |
| Sulfur Dioxide ($SO_2$) | Attainment | Attainment |
| Lead (Pb) | Attainment | Attainment |
| Sulfates | (No federal standard) | Attainment |
| Hydrogen Sulfide | (No federal standard) | Unclassified |
| Visibility | (No federal standard) | Unclassified |

Source: SDAPCD 2021b
[1] At the time of designation, if the available data do not support a designation of attainment or nonattainment, the area is designated as unclassifiable.

SDAPCD maintains and operates a network of ambient air monitoring stations throughout ~~the county.~~San Diego County. The purpose of the monitoring stations is to measure ambient concentrations of the pollutants and determine whether the ambient air quality meets the CAAQS and NAAQS. The ambient monitoring station closest to the project site is the Alpine station (CARB 80128), which is approximately 1.5 miles southeast of the project site. The pollutants monitored at the Alpine station are $O_3$ and $NO_2$. Monitoring values for CO, $PM_{10}$, and $PM_{2.5}$ were obtained from the next closest monitoring station, which is the El Cajon-Lexington Elementary School located approximately 11 miles west of the project site. The air quality trends from these stations are used to represent ambient air quality in the project area. Ambient air quality values in the project area from 2017 to 2019 (the most recent available period) are shown in Table 4.3-2. Over the 2017 to 2019 period of available data, monitoring has shown the following air quality trends: both the 1-hour CAAQS and 8-hour NAAQS and CAAQS have been exceeded numerous times at the Alpine station; 24-hour $PM_{2.5}$ NAAQS was exceeded once at El Cajon-Lexington Elementary station in 2018; and there was no CO, $NO_2$, or $PM_{10}$ exceedances over the 2017 to 2019 period.

**Table 4.3-2. Ambient Air Quality Data for the Project Area (2017–2019)**

| Pollutant Standards | 2017 | 2018 | 2019 |
|---|---|---|---|
| **Ozone ($O_3$) at Alpine station** | | | |
| Maximum 1-hour concentration (ppm) | 0.109 | 0.102 | 0.110 |
| Maximum 8-hour concentration (ppm) | 0.095 | 0.083 | 0.085 |
| Fourth highest 8-hour concentration (ppm) | 0.090 | 0.080 | 0.077 |
| Number of days standard exceeded | | | |
| CAAQS 1-hour standard (> 0.09 ppm) | 11 | 2 | 2 |
| CAAQS 8-hour standard (> 0.070 ppm) | 51 | 22 | 18 |
| NAAQS 8-hour standard (> 0.070 ppm) | 48 | 20 | 16 |
| **Carbon Monoxide (CO) at El Cajon-Lexington Elementary School station** | | | |
| Maximum 8-hour concentration (ppm) | 1.4 | 1.1 | 1.0 |
| Maximum 1-hour concentration (ppm) | 1.5 | 1.4 | 1.3 |
| Number of days standard exceeded | | | |
| NAAQS 8-hour standard (≥ 9 ppm) | 0 | 0 | 0 |
| CAAQS 8-hour standard (≥ 9.0 ppm) | 0 | 0 | 0 |
| NAAQS 1-hour standard (> 35 ppm) | 0 | 0 | 0 |
| CAAQS 1-hour standard (≥ 20 ppm) | 0 | 0 | 0 |
| **Nitrogen Dioxide ($NO_2$) at Alpine station** | | | |
| Maximum ~~s~~State 1-hour concentration (ppm) | 0.028 | 0.031 | 0.029 |
| Annual average concentration (ppm) | 0.004 | 0.004 | 0.004 |
| Number of days standard exceeded | | | |
| CAAQS 1-hour standard (0.180 ppm) | 0 | 0 | 0 |
| NAAQS 1-hour standard (0.100 ppm) | 0 | 0 | 0 |
| **Particulate Matter ($PM_{10}$) at El Cajon-Lexington Elementary School station** | | | |
| Maximum ~~s~~State 24-hour concentration (µg/m³) | 49.4 | 44.7 | 37.4 |
| Maximum national 24-hour concentration (µg/m³) | 50.0 | 43.0 | 38.7 |
| National annual average concentration | 22.6 | 22.6 | 20.1 |
| Measured number of days standard exceeded | | | |
| CAAQS 24-hour standard (50 µg/m³) | 0 | 0 | 0 |
| NAAQS 24-hour standard (150 µg/m³) | 0 | 0 | 0 |
| **Particulate Matter ($PM_{2.5}$) at El Cajon-Lexington Elementary School station** | | | |
| Maximum ~~s~~State 24-hour concentration (µg/m³) | 35.6 | 42.0 | 25.7 |
| Maximum national 24-hour concentration (µg/m³) | 31.8 | 36.2 | 23.8 |
| National annual average concentration | 9.5 | 9.6 | 8.5 |
| Measured number of days standard exceeded | | | |
| NAAQS 24-hour standard (> 35 µg/m³) | 0 | 1 | 0 |

Sources: CARB 2021f, EPA 2021f.
Note: µg/m³ = micrograms per cubic meter; an exceedance is not necessarily a violation.

### 4.3.2.4 Sensitive Receptors

Sensitive receptors are defined as locations where pollutant-sensitive members of the population may reside or where the presence of air pollutant emissions could adversely affect use of the land. Sensitive members of the population include those who may be more negatively affected by poor air quality than other members of the population, such as children, the elderly, or the infirm. In general, residential areas, hospitals, daycare facilities, elder-care facilities, elementary schools, and parks typically contain a high concentration of these sensitive population groups (CARB 2005a).

Land uses surrounding the project site include open space conservation, semi-rural residential, and vacant/undeveloped land. The closest residences are immediately adjacent to the northeast and south of the project site, across South Grade Road.

## 4.3.3 Applicable Laws and Regulations

### 4.3.3.1 Federal

#### Clean Air Act and National Ambient Air Quality Standards

The federal CAA was enacted in 1963 and amended numerous times in subsequent years (1965, 1967, 1970, 1977, and 1990). The CAA establishes federal air quality standards, known as NAAQS, and specifies future dates for achieving compliance. The CAA also requires each state to submit and implement a State Implementation Plan (SIP) for local areas that fail to meet the standards. The plan must include pollution control measures that demonstrate how the standards will be met.

The 1990 amendments to the CAA identify specific emission reduction goals for areas that fail to meet the NAAQS. These amendments require both a demonstration of reasonable progress toward attainment and incorporation of additional sanctions for failure to attain or meet interim milestones. The sections of the CAA that would affect development of the project include Title I (Nonattainment Provisions) and Title II (Mobile-Source Provisions).

Table 4.3-3 shows the NAAQS that are currently in effect for each criteria pollutant. The CAAQS (discussed below) are provided for reference.

**Table 4.3-3. Federal and State Ambient Air Quality Standards**

| Criteria Pollutant | Average Time | California Standards | National Standards[1] | |
|---|---|---|---|---|
| | | | Primary | Secondary |
| Ozone | 1 hour | 0.09 ppm | None[2] | None[2] |
| | 8 hours | 0.070 ppm | 0.070 ppm | 0.070 ppm |
| Respirable Particulate Matter ($PM_{10}$) | 24 hours | 50 μg/$m^3$ | 150 μg/$m^3$ | 150 μg/$m^3$ |
| | Annual mean | 20 μg/$m^3$ | None | None |
| Fine Particulate Matter ($PM_{2.5}$) | 24 hours | None | 35 μg/$m^3$ | 35 μg/$m^3$ |
| | Annual mean | 12 μg/$m^3$ | 12.0 μg/$m^3$ | 15.0 μg/$m^3$ |
| Carbon Monoxide | 8 hours | 9.0 ppm | 9 ppm | None |
| | 1 hour | 20 ppm | 35 ppm | None |

| Criteria Pollutant | Average Time | California Standards | National Standards[1] | |
|---|---|---|---|---|
| | | | Primary | Secondary |
| Nitrogen Dioxide | Annual mean | 0.030 ppm | 0.053 ppm | 0.053 ppm |
| | 1 hour | 0.18 ppm | 0.100 ppm | None |
| Sulfur Dioxide[3] | Annual mean | None | 0.030 ppm | None |
| | 24 hours | 0.04 ppm | 0.14 ppm | None |
| | 3 hours | None | None | 0.5 ppm |
| | 1 hour | 0.25 ppm | 0.075 ppm | None |
| Lead | 30-day average | 1.5 μg/m$^3$ | None | None |
| | Calendar quarter | None | 1.5 μg/m$^3$ | 1.5 μg/m$^3$ |
| | 3-month average | None | 0.15 μg/m$^3$ | 0.15 μg/m$^3$ |
| Sulfates | 24 hours | 25 μg/m$^3$ | None | None |
| Visibility-Reducing Particles | 8 hours | --[4] | None | None |
| Hydrogen Sulfide | 1 hour | 0.03 ppm | None | None |
| Vinyl Chloride | 24 hours | 0.01 ppm | None | None |

Source: CARB 2016.
[1] National standards are divided into primary and secondary standards. Primary standards are intended to protect public health, whereas secondary standards are intended to protect public welfare and the environment.
[2] The federal 1-hour standard of 12 parts per hundred million was in effect from 1979 through June 15, 2005. The revoked standard is referenced because it was employed for such a long period and is a benchmark for SIPs.
[3] The annual and 24-hour NAAQS for sulfur dioxide apply for only 1 year after designation of the new 1-hour standard in areas that were previously nonattainment areas for the 24-hour and annual NAAQS.
[4] The CAAQS for visibility-reducing particles is defined by an extinction coefficient of 0.23 per kilometer (visibility of 10 miles or more due to particles when relative humidity is less than 70%).

## Non-Road Diesel Rule

The EPA has established a series of increasingly strict emissions standards for new off-road diesel equipment, on-road diesel trucks, and locomotives. New construction equipment used for the project, including heavy-duty trucks and off-road construction equipment, would be required to comply with the emissions standards.

## Corporate Average Fuel Economy Standards

The National Highway Traffic Safety Administration (NHTSA) Corporate Average Fuel Economy (CAFE) standards require substantial improvements in fuel economy and reductions in emissions of criteria air pollutants and precursors, as well as greenhouse gases, from all light-duty vehicles sold in the United States. On August 2, 2018, NHTSA and the EPA proposed an amendment to the fuel efficiency standards for passenger cars and light trucks and established new standards for model years 2021 through 2026 that would maintain the then-current 2020 standards through 2026—this was known as the Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule. On September 19, 2019, NHTSA and the EPA issued a final action on the One National Program Rule, which is considered Part One of the SAFE Vehicles Rule and a precursor to the proposed fuel efficiency standards. The One National Program Rule enables NHTSA and the EPA to provide nationwide uniform fuel economy and air pollutant standards by (1) clarifying that federal law preempts state and local tailpipe standards, (2) affirming NHTSA's statutory authority to set nationally applicable fuel economy standards, and (3) withdrawing California's CAA preemption waiver to set ~~s~~State-specific standards.

NHTSA and the EPA published their decision to withdraw California's waiver and finalize the regulatory text related to the preemption on September 27, 2019 (84 *Federal Register* 51310). California, 22 other states, the District of Columbia, and two cities filed suit against Part One of the SAFE Vehicles Rule on September 20, 2019 (*California et al. v. United States Department of Transportation et al.,* 1:19-cv-02826, U.S. District Court for the District of Columbia). On October 28, 2019, the Union of Concerned Scientists, Environmental Defense Fund, and other groups filed a protective petition for review after the federal government sought to transfer the suit to the District of Columbia (*Union of Concerned Scientists v. National Highway Traffic Safety Administration*). The lawsuit filed by California and others has been stayed, pending resolution of the petition.

NHTSA and the EPA published final rules on April 30, 2020, to amend and establish national air pollutant and fuel economy standards (Part Two of the SAFE Vehicles Rule) (85 *Federal Register* 24174). The revised rule changes the national fuel economy standards for light-duty vehicles from 46.7 miles per gallon (mpg) to 40.4 mpg in future years. California, 22 other states, and the District of Columbia filed a petition for review of the final rule on May 27, 2020.[1]

On January 20, 2021, President Biden issued an executive order directing the EPA and NHTSA to review the SAFE Vehicles Rule and propose a new rule suspending, revising, or rescinding it. On April 22, 2021, NTHSA issued a notice of proposed rulemaking to repeal the SAFE Vehicles Rule (49 Code of Federal Regulations Parts 531 and 533).

# 4.3.3.2 State

## California Clean Air Act and California Ambient Air Quality Standards

In 1988, the ~~s~~State legislature adopted the California CAA, which established a statewide air pollution control program. The California CAA requires all air districts in the ~~s~~State to endeavor to meet the CAAQS by the earliest practical date. Unlike the federal CAA, the California CAA does not set precise attainment deadlines. Instead, the California CAA establishes increasingly stringent requirements for areas that require more time to achieve the standards. The CAAQS are generally more stringent than the NAAQS and incorporate additional standards for sulfates, hydrogen sulfide, visibility-reducing particles, and vinyl chloride. The CAAQS and NAAQS are listed together in Table 4.3-3.

CARB and local air districts bear responsibility for achieving California's air quality standards. The standards are to be achieved through district-level air quality management plans, which are incorporated into the SIP. In California, EPA has delegated authority to prepare SIPs to CARB, which, in turn, has delegated that authority to individual air districts. CARB has traditionally established ~~s~~State air quality standards, maintained oversight authority for air quality planning, developed programs for reducing emissions from motor vehicles, developed air emissions inventories, collected air quality and meteorological data, and approved SIPs.

The California CAA substantially increases the authority and responsibilities of air districts. The California CAA designates air districts as lead air quality planning agencies, requires air districts to prepare air quality plans, and grants air districts authority to implement transportation control measures. The California CAA also emphasizes control of "indirect and area-wide sources" of air

[1] *California et al. v. United States Department of Transportation et al.*, 1:19-cv-02826, U.S. District Court for the District of Columbia.

pollutant emissions. The California CAA gives local air pollution control districts explicit authority to regulate indirect sources and establish traffic control measures.

## Statewide Truck and Bus Regulation

CARB adopted the Truck and Bus Regulation in 2008 to focus its efforts on reducing emissions of DPM, $NO_X$, and other criteria pollutants from diesel-fueled vehicles. This regulation applies to any diesel-fueled vehicle as well as any dual-fuel or alternative-fuel diesel vehicle that travels on public highways, yard trucks with on-road engines, yard trucks with off-road engines used for agricultural operations, school buses, and vehicles with a gross vehicle weight rating (GVWR) of more than 14,000 pounds. The purpose of the regulation is to require trucks and buses registered in the ~~s~~State to have 2010 or newer engines by 2023. Compliance schedules have been established for lighter vehicles (GVWR of 14,000–26,000 pounds) and heavier vehicles (GVWR of more than 26,001 pounds) (CARB 2020). As of January 1, 2020, only vehicles that mee~~t~~ the requirements of the Trucks and Bus Regulation ~~a~~were allowed to register with the California Department of Motor Vehicles.

## Air Toxic Control Measure

In 2004, CARB developed multiple measures under its Air Toxic Control Measure (ATCM) to address specific mobile- and stationary-source issues that have an impact on public health. The ATCMs focused on reducing the public's exposure to DPM and TAC emissions. The "Limit Diesel-Fueled Commercial Motor Vehicle Idling" ATCM required drivers of heavy-duty trucks with a GVWR of more than 10,000 pounds to not idle the primary engine for more than 5 minutes at any given time or operate an auxiliary power system for more than 5 minutes within 100 feet of a restricted area (CARB 2005b). In addition, CARB set operating requirements for new emergency standby engines (i.e., diesel-fueled compression-ignition engines of less than 50 brake horsepower). Specifically, new engines are not allowed to operate more than 50 hours per year for maintenance and testing purposes. This does not limit engine operation for emergency use or emission testing required to show compliance with ATCM Section 93115.6(a)(3).

## Toxic Air Contaminant Regulation

California regulates TACs primarily through the Toxic Air Contaminant Identification and Control Act (Tanner Act) and the Air Toxics "Hot Spots" Information and Assessment Act of 1987 ("Hot Spots" Act). In the early 1980s, CARB established a statewide comprehensive air toxics program to reduce exposure to air toxics. The Tanner Act created California's program to reduce the public's exposure to air toxics. The "Hot Spots" Act supplements the Tanner Act by requiring a statewide air toxics inventory, notification for people who were exposed to a significant health risk, and facility plans to reduce risks.

In August 1998, CARB identified DPM from diesel-fueled engines as a TAC. In September 2000, CARB approved a comprehensive Diesel Risk Reduction Plan to reduce emissions from both new and existing diesel-fueled engines and vehicles. The goal of the plan was to reduce DPM (i.e., respirable particulate matter) emissions, and associated health risk, by 75% in 2010 and 85% by 2020. The plan identifies 14 measures that CARB will implement over the next several years (CARB 200b).

### Off-Road Diesel Vehicle Regulation

Off-road vehicles include, but are not limited to, diesel compression-ignition equipment; spark-ignition gasoline and liquified petroleum gas equipment; support equipment at ports, airports, and railways; and marine vehicles. In 2007, CARB aimed to reduce emissions of DPM, $NO_X$, and other criteria pollutants from off-road diesel-fueled equipment with adoption of the In-Use Off-Road Diesel-Fueled Fleets Regulation (Off-Road Regulation). The Off-Road Regulation applies to all diesel-fueled equipment or alternative-fuel diesel equipment with a compression-ignition engine greater than 25 horsepower (e.g., tractors, bulldozers, backhoes) as well as dual-fuel equipment. The regulation also applies to all equipment that is rented or leased (CARB 2008). The purpose of the regulation is to reduce emissions by retiring, repowering, or replacing older, dirtier engines with newer, cleaner engines. The regulation established a compliance schedule for owners of small, medium, and large fleets. The schedule for large and medium fleets requires full implementation by 2023; small fleets have until 2028 (CARB 2008).

## 4.3.3.3 Regional

### San Diego Air Pollution Control District

Local air pollution control districts have the primary responsibility for the development and implementation of rules and regulations designed to attain the NAAQS and CAAQS, as well as the permitting of new or modified sources, development of air quality management plans, and adoption and enforcement of air pollution regulations. SDAPCD is the local agency responsible for the administration and enforcement of air quality regulations in ~~the county~~San Diego County.

#### Regional Air Quality Strategy and State Implementation Plan

CARB, SDAPCD, and the San Diego Association of Governments (SANDAG) are responsible for developing and implementing the clean air plan for attainment and maintenance of the ambient air quality standards in the SDAB. ~~San Diego~~The County is currently in nonattainment for $O_3$ under the NAAQS and for $O_3$, $PM_{10}$, and $PM_{2.5}$ under the CAAQS.

The San Diego Regional Air Quality Strategy (RAQS) outlines SDAPCD's plans and control measures designed to attain and maintain the ~~s~~State standards, while San Diego's portions of the SIP are designed to attain and maintain federal standards. The RAQS was initially adopted in 1991 and is updated on a triennial basis. The RAQS was updated in 1995, 1998, 2001, 2004, 2009, and most recently in December 2016 (SDAPCD 2018). The RAQS does not currently address the ~~s~~State air quality standards for $PM_{10}$ or $PM_{2.5}$. SDAPCD has also developed the air basin's input to the SIP, which is required under the federal CAA for areas that are out of attainment of air quality standards. The most recent federal plan is the 2020 Plan for Attaining the National Ozone Standards (Attainment Plan). Both the RAQS and Attainment Plan demonstrate the effectiveness of CARB measures (mainly for mobile sources) and SDAPCD's plans and control measures (mainly for stationary and area-wide sources) for attaining the $O_3$ NAAQS (SDAPCD 2020). In addition, the *Measures to Reduce Particulate Matter in San Diego County* report proposed measures to reduce PM emissions and recommends measures for further detailed evaluation and, if appropriate, future rule development (or non-regulatory development, if applicable), adoption, and implementation in ~~the county~~San Diego County, in order to attain PM CAAQS (SDAPCD 2005).

### SDAPCD Rules and Regulations

SDAPCD is responsible for establishing and enforcing local air quality rules and regulations that address the requirements of federal and ~~s~~State air quality laws. The project may be subject to the following SDAPCD rules, and others, during construction.

- **Rule 50—Visible Emissions:** establishes limits for the opacity of emissions within the SDAPCD. The project is subject to Rule 50(d)(1) and (6) and should not exceed the visible emission limitation.
- **Rule 51—Nuisance:** prohibits emissions that cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public; endanger the comfort, repose, health, or safety of any such persons or the public; or cause injury or damage to business or property.
- **Rule 52—Particulate Matter:** establishes limits for the discharge of any particulate matter from nonstationary sources.
- **Rule 54—Dust and Fumes:** establishes limits for the amount of dust or fume discharged into the atmosphere in any 1 hour.
- **Rule 55—Fugitive Dust Control:** sets restrictions on visible fugitive dust from construction and demolition projects.
- **Rule 67—Architectural Coatings:** establishes limits to the VOC content for coatings applied within the SDAPCD.
- **Rule 67.7—Cutback and Emulsified Asphalts:** establishes general provisions and limits to the VOC content for asphalt materials applied within the SDAPCD.

## San Diego Association of Governments San Diego Forward: The Regional Plan

San Diego Forward: The Regional Plan (Regional Plan) was adopted by the SANDAG Board of Directors on October 9, 2015, to establish a long-range blueprint for the San Diego region's growth and development through the year 2050. The Regional Plan was developed in close partnership with the region's 18 cities and the County ~~governmentand~~, and aims to provide innovative mobility choices and planning to support a sustainable quality of life in a healthy region, with a vibrant economy.

The 2015 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) includes the following six policy objectives that provide a framework for the proposed sustainability strategy (SANDAG 2015):

1. **Habitat and Open Space Preservation**
    a. Focus growth in areas that are already urbanized, allowing the region to set aside and restore more open space in our less developed areas.
    b. Protect and restore ~~the~~our region's urban canyons, coastlines, beaches, and water resources.
2. **Regional Economic Prosperity**
    a. Invest in transportation projects that provide access for all communities to a variety of jobs with competitive wages.

b. Build infrastructure that makes the movement of freight in ~~the~~our community more efficient and environmentally friendly.

3. **Environmental Stewardship**

   a. Make transportation investments that result in cleaner air, environmental protection, conservation, efficiency, and sustainable living.

   b. Support energy programs that promote sustainability.

4. **Mobility Choices**

   a. Provide safe, secure, healthy, affordable, and convenient travel choices between the places where people live, work, and play.

   b. Take advantage of new technologies to make the transportation system more efficient and accessible.

5. **Partnerships/Collaboration**

   a. Collaborate with Native American tribes, Mexico, military bases, neighboring counties, infrastructure providers, the private sector, and local communities to design a transportation system that connects to the megaregion and national network, works for everyone, and fosters a high quality of life for all.

   b. As we plan for our region, recognize the vital economic, environmental, cultural, and community linkages between the San Diego region and Baja California.

6. **Healthy and Complete Communities**

   a. Create great places for everyone to live, work, and play.

   b. Connect communities through a variety of transportation choices that promote healthy lifestyles, including walking and biking.

   c. Increase the supply and variety of housing types -- affordable for people of all ages and income levels in areas with frequent transit service and with access to a variety of services.

SANDAG's *San Diego Forward: The 2021 Regional Plan* is currently in development and is anticipated to be adopted in late 2021. This updated plan will introduce five key transportation strategies (SANDAG 2021):

1. **Complete Corridors**: connected routes that provide a variety of travel choices for those who walk, bike, drive, or ride transit.
2. **Transit Leap**: a complete network of fast, high-capacity, high-frequency transit services that connect residential areas with employment centers and attractions.
3. **Mobility Hubs**: locations of connectivity where mobility services, amenities, and supporting technologies come together to better connect high-frequency transit to the individual.
4. **Flexible Fleets**: shared mobility services including on-demand rideshare, bikeshare, or scootershare.
5. **Next Operating System (OS)**: a system that collectively analyzes the entire transportation network to improve transportation planning, operation, and experience.

# 4.3.4 Project Impact Analysis

## 4.3.4.1 Methodology

Air quality impacts associated with construction and operation of the various project components were assessed and quantified using industry standard and accepted software tools, techniques, and emission factors. A summary of the methodology is provided below. A full list of assumptions and emission calculations can be found in Appendix C. The methodology used to estimate air quality emissions discussed below is the same that was used to estimate GHG emissions, as described in Section 4.8.

### Construction

Construction of the project would generate emissions of VOC, $NO_X$, CO, $SO_X$, $PM_{10}$, and $PM_{2.5}$ that could result in short-term impacts on ambient air quality in the study area. Emissions would result from off-road equipment exhaust, employee vehicles and haul trucks, fugitive dust from site grading and earthmoving activities, re-entrained road dust from vehicle travel, and off-gassing emissions from architectural coatings and paving; each of these are discussed in detail below. Emissions were estimated using the California Emissions Estimator Model (CalEEMod), version 2016.3.2. The estimates relied on a combination of CalEEMod default data values as well as information based on similar types of projects provided by County DPR staff. ~~Construction is expected to~~The following analysis was developed assuming construction would begin in ~~the~~ fall ~~of~~ 2022 and last approximately 16 months. Construction phasing would include site preparation, grading and excavation, utility installation, sewer line installation, paving, and architectural coating. A detailed description of model input and output parameters and assumptions is provided in Appendix C.

- **Off-Road Equipment:** Emissions associated with diesel-powered construction equipment were estimated based on emission factor~~s~~, horsepower, and load factors from CalEEMod (version 2016.3.2), with activity data (hours per days, days of use) confirmed by County DPR staff.
- **On-Road Vehicles:** On-road vehicles (e.g., delivery trucks, haul trucks, and passenger vehicles) would be required for material deliveries to the project site, material hauling from the project site, onsite material movement, and employee commuting. Exhaust emissions from on-road vehicles were estimated in CalEEMod using daily activity data including the number of trips per day. Emission factors for haul trucks are based on aggregated-speed emission rates for ~~EMFAC's~~ EMission FACtor's (EMFAC) heavy-heavy duty truck (HHDT) vehicle category. Emission factors for water and vendor trucks are based on aggregated-speed emission rates for EMFAC's HHDT and medium heavy-duty trucks (MHDT) vehicle categories with a fleet mix consisting of 50% MHDT and 50% HHDT. Emission factors for employee commute vehicles are based on a weighted average of the aggregated-speed emission rates for EMFAC's light-duty automobile/light-duty truck vehicle categories (LDA, LDT1, and LDT2). The employee commute vehicles consisted of a fleet mix of 50% LDA, 25% LDT1, and 25% LDT2. Fugitive dust from travel on paved roads by worker vehicles, vendors, and haul trucks was estimated using CalEEMod and are based on emission factors from EPA's AP-42 Compilation of Air Pollutant Emission Factors, Section 13.2.1 Paved Roads guidance, and CARB's Miscellaneous Process Methodology 7.9, Entrained Road Travel, Paved Road Dust.
- **Site Grading and Earth Movement:** Fugitive dust emissions from earth movement (e.g., site preparation and excavation/grading and truck loading) were quantified using emission factors

from CalEEMod. Based on the project's grading plans, it was estimated that a majority of soil would be balanced onsite, and ~~therefore~~ soil export trucks would not be required. However, a variety of fill materials for trails and walkways would be imported by haul trucks. Fill material to be imported would require approximately 1,700 trucks trips during the construction period assuming approximately 13,400 cubic yards of import using 16-cubic-yard trucks. The analysis includes dust control ~~measures~~ such as watering exposed areas three times per day consistent with SDAPCD Rule 55.

- **Paving:** Fugitive ROG emissions were calculated based the assumption of 3 acres to be paved at the project site and the CalEEMod default emission factor of 2.62 pounds of ROG per acre paved.
- **Architectural Coatings**: ROG emissions from the application of architectural coatings were calculated based on the total surface amount to be coated for the project and the VOC content of the coatings. The amount of surface to be coated was determined using CalEEMod's default assumption that the total surface for painting for a project equals 2 times that for non-residential square footage. Additionally, of the total surface area to be coated, CalEEMod assumes that 75% of the area would be for the interior surfaces and 25% would be for the exterior shell. Additionally, CalEEMod assumes 6% of the parking area would be painted for striping. The default VOC content value of 250 grams per liter was used for all project components.

## Operation

Operation of the project would generate emissions of VOC, $NO_X$, CO, $SO_X$, $PM_{10}$, and $PM_{2.5}$. Criteria pollutant emissions would be generated from mobile and area sources. The project would not consume natural gas emissions. CalEEMod was used to estimate emissions from these sources, and a discussion of each is provided below. The project buildout year for the ~~project~~ following analysis is assumed to be 2024 based on a ~~fall 2022~~spring 2024 construction start date ~~and a 16-month construction period.~~.

A detailed description of model input and output parameters and assumptions is provided in Appendix C.

- **Mobile Sources:** Emissions from motor vehicles are associated with park visitors and periodic maintenance. Mobile emissions were estimated using daily trip estimates provided in the project's Transportation Impact Study (TIS) (Chen Ryan 2020) and CalEEMod's default trip lengths and emission factors for 2024. The TIS estimated the project would generate 480 daily trips.
- **Area Sources:** Area source emissions were estimated using CalEEMod and are associated with re-application of architectural coatings as part of building maintenance, consumer products (e.g., cleaning compounds, degreasers, and fertilizers), and combustion of fuel from landscaping equipment. Architectural coatings and consumer product use are based on the square footage of the project's buildings (e.g., concessions, restrooms, ranger office). A Health Club land use was used in CalEEMod to account for building square footage and associated area sources.

# 4.3.4.2 Thresholds of Significance

## Appendix G of the ~~State~~ CEQA Guidelines

Based on guidance provided in Appendix G of the ~~State~~ CEQA Guidelines and the County ~~of San Diego~~ Guidelines for Determining Significance for Air Quality, the project would result in a significant impact if it would:

1. Conflict with or obstruct implementation of the applicable air quality plan;
2. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or ~~s~~State ambient air quality standard;
3. Expose sensitive receptors to substantial pollutant concentrations; and~~/or~~
4. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

## County of San Diego Guidelines for Determining Significance

The CEQA thresholds provided by the *County of San Diego Guidelines for Determining Significance for Air Quality* (County of San Diego 2007) state that a significant impact would occur if project implementation would result in the following:

1. Conflict with or obstruct implementation of the San Diego Regional Air Quality Strategy (RAQS) or applicable portions of the State Implementation Plan (SIP).
2. Result in emissions that would violate any air quality standard or contribute substantially to an existing or projected air quality violation.
3. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable Federal or State ambient air quality standard ($PM_{10}$, $PM_{2.5}$ or exceed quantitative thresholds for $O_3$ precursors, oxides of nitrogen [$NO_X$] and Volatile Organic Compounds [VOCs]).
4. Expose sensitive receptors (including, but not limited to, schools, hospitals, resident care facilities, or day-care centers) to substantial pollutant concentrations.
5. Create objectionable odors affecting a substantial number of people.

The California Supreme Court's decision in *Sierra Club v. County of Fresno* ~~(~~, 6 Cal. 5th 502 (2018) (hereafter referred to as the Friant Ranch Decision) reviewed the long-term, regional air quality analysis contained in the EIR for the proposed Community Plan Update and Friant Ranch Specific Plan (Friant Ranch Project). The Friant Ranch Project is a 942-acre master-plan development in unincorporated Fresno County within the San Joaquin Valley Air Basin, an air basin currently in nonattainment under the NAAQS and CAAQS for $O_3$ and $PM_{2.5}$. The Court found that the EIR's air quality analysis was inadequate because it failed to provide enough detail "for the public to translate the bare [criteria pollutant emissions] numbers provided into adverse health impacts or to understand why such a translation is not possible at this time." The Court's decision clarifies that environmental documents must attempt to connect a project's air quality impacts to specific health effects or explain why it is not technically feasible to perform such an analysis.

As discussed above, all pollutants that would be generated by the project are associated with some form of health risk (e.g., asthma, lower respiratory problems). Regional pollutants can be transported over long distances and affect ambient air quality far from the emissions source. Localized pollutants affect ambient air quality near the emissions source. As noted, the primary pollutants of concern generated by the project are $O_3$ precursors (ROG and $NO_X$), CO, and PM (including DPM). Emission thresholds that can be used to evaluate the significance level of regional and localized pollutants are discussed in the following subsections.

## Thresholds for Criteria Pollutants

The ~~State~~ CEQA Guidelines, Appendix G (14 California Code of Regulations 15000 et seq.), provides guidance for determining whether a project could have significant air quality impacts. Moreover, Appendix G states that, where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations, and Section 15064.7(c) states that when adopting or using thresholds of significance, a lead agency may consider thresholds of significance previously adopted or recommended by other public agencies or recommended by experts, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence.

While SDAPCD has not developed specific thresholds of significance to evaluate construction and operation criteria pollutant impacts within CEQA documents, SDAPCD's Regulation II, Rules 20.2 and 20.3 (new source review for non-major and major stationary sources, respectively), outline Air Quality Impact Analysis (AQIA) Trigger Levels for regional criteria pollutants for new or modified sources. Based on SDAPCD's AQIA Trigger Levels, as well as EPA rulemaking and CEQA thresholds adopted by the South Coast Air Quality Management District (SCAQMD), the County has established Screening Level Thresholds (SLTs) to assist lead agencies in determining the significance of project-level regional air quality impacts within ~~the county~~San Diego County (as shown in Table 4.3-4). Although SDAPCD does not have VOC or $PM_{2.5}$ AQIA Trigger Levels, the County recommends a $PM_{2.5}$ SLT based on EPA's "Proposed Rule to Implement the Fine Particle National Ambient Air Quality Standards" published on September 8, 2005, which is also consistent with SCAQMD's Air Quality Significance Thresholds (SCAQMD 2015), and a VOC SLT based on the threshold of significance for VOCs from the SCAQMD previously recommended for projects in the Coachella Valley. Emissions in excess of the County's SLTs, shown in Table 4.3-4, would be expected to have a significant impact on regional air quality because an exceedance of the SLTs is anticipated to contribute to CAAQS and NAAQS violations in ~~the county~~San Diego County.

The County's SLTs are based on SDAPCD AQIA Trigger Levels, and these AQIA Trigger Levels are based on emissions levels identified under the New Source Review (NSR) program, which is a permitting program established by Congress as part of the CAA Amendments of 1990 to ensure that air quality is not significantly degraded by new or modified sources of emissions. The NSR program requires that stationary sources receive permits before construction begins and/or the use of equipment. By permitting stationary sources, the NSR program ensures that new emissions would not slow regional progress toward attaining the NAAQS. SDAPCD's Trigger Levels outlined in Rules 20.2 and 20.3 were set as the total emission thresholds associated with the NSR program to help attain and maintain the NAAQS from new and modified non-major stationary sources.[2] SDAPCD's

[2] San Diego County Air Pollution Control District, Rule 20.2, Table 20.2-1, incorporated by reference: https://www.sdapcd.org/content/dam/sdc/apcd/PDF/Rules_and_Regulations/Permits/APCD_R20-2.pdf.

Trigger Levels take into account the region's attainment status, emission profile, inventory, and projections, and represent levels above which project-generated emissions could affect SDAPCD's role and commitment to attain the CAAQS and NAAQS in the region. Consistent with Section 15064.7(c) of the ~~State~~ CEQA Guidelines (see above), the evidence in support of the air quality thresholds shown in Table 4.3-4 is deemed appropriate for their use in this analysis and in this location within the greater SDAB.

**Table 4.3-4. County of San Diego Screening-Level Thresholds**

| | Emission Rate | | |
|---|---|---|---|
| Air Contaminant | (pounds per hour) | (pounds per day)[1] | (tons per year) |
| Respirable Particulate Matter ($PM_{10}$) | -- | 100 | 15 |
| Fine Particulate Matter ($PM_{2.5}$)[2] | -- | 55 | 10 |
| Nitrogen Oxides ($NO_X$) | 25 | 250 | 40 |
| Sulfur Oxides ($SO_X$) | 25 | 250 | 40 |
| Carbon Monoxide (CO) | 100 | 550 | 100 |
| Lead (Pb)[3] | -- | 3.2 | 0.6 |
| Volatile Organic Compounds (VOC)/Reactive Organic Gasses (ROG)[4] | -- | 75 | 13.7[5] |

Source: County of San Diego 2007.
[1] The County's Guidelines for Determining Significance for Air Quality states that daily SLTs are most appropriate when assessing impacts from standard construction and operational emissions. Therefore, daily SLTs are used to evaluate project significance, while hourly and annual SLTs are provided for informational purposes only.
[2] Based on EPA's "Proposed Rule to Implement the Fine Particle National Ambient Air Quality Standards" published September 8, 2005, and also SCAQMD's Air Quality Significance Thresholds (SCAQMD 2019).
[3] Lead and lead compounds.
[4] County SLTs for VOCs were originally based on the threshold of significance for VOCs from SCAQMD for the Coachella Valley. The terms VOC and ROG are used interchangeably herein, although the County uses the term VOC.
[5] 13.7 tons per year threshold is based on 75 pounds per day multiplied by 365 days per year and divided by 2,000 pounds per ton.

In addition to the thresholds shown in Table 4.3-4, The County has also developed screening criteria to evaluate CO hot-spots from motor vehicle traffic, which can be a problem in urban areas (County of San Diego 2007). Hot-spots typically occur in areas of high motor vehicle use, such as in parking lots, at congested intersections, and along highways. Because elevated CO concentrations typically occur at locations with high traffic volumes and congestion, elevated CO concentrations are often correlated with level of service (LOS) at intersections. LOS expresses the congestion level for an intersection and is designated by a letter from A to F, with LOS A representing the best operating conditions and LOS F the worst. Significant concentrations of CO sometimes occur (depending on temperature, wind speed, and other variables) at intersections where LOS is rated at D or worse.

The thresholds presented in Table 4.3-4 consider existing air quality concentrations and attainment or nonattainment designations under the NAAQS and CAAQS. The NAAQS and CAAQS are informed by a wide range of scientific evidence that demonstrates there are known safe concentrations of criteria pollutants. While recognizing that air quality is a cumulative problem, SDAPCD, through Rule 20.2, and the County, through its Guidelines for Determining Significance, consider projects that generate criteria pollutant and $O_3$ precursor emissions below these thresholds to be minor in nature and would not adversely affect air quality such that the health-protective NAAQS or CAAQS would be exceeded. Regional emissions generated by the project could increase photochemical reactions and the formation of tropospheric $O_3$ and secondary PM, which at certain concentrations could lead to

increased incidence of specific health consequences. Although these health effects are associated with $O_3$ and particulate pollution, the effects are a result of cumulative and regional emissions.

## Thresholds for Toxic Air Contaminants

The County recommends incremental cancer and hazard thresholds to evaluate receptor exposure to DPM emissions, which are adapted from SDAPCD Regulation XII, Rule 1200 (1996) (County of San Diego 2007). Projects that would lead to exposure to TACs resulting in a maximum incremental cancer risk (MICR) greater than 1 in 1 million without application of Toxics Best Available Control Technology (T-BACT),[3] MICR greater than 10 in 1 million with application of T-BACT, or a chronic and acute non-cancer health hazard index greater than 1 would be deemed as having a potentially significant impact related to health risks from DPM exposure. These significance thresholds are consistent with the SDAPCD Rule 1210 requirements for stationary sources.

There are no quantitative thresholds related to receptor exposure to asbestos. However, SDAPCD Rule 1206 requires that facility surveys be performed to identify the presence of asbestos containing materials (ACM) prior to commencement of demolition or renovation activities. If ACM is found then the demolition or renovation activities must comply with notification requirements and procedures for asbestos emissions control and waste handling and disposal, including complying with the limitations of the National Emission Standards for Hazardous Air Pollutants regulations as listed in Code of Federal Regulations, Title 40, Part 61.

# 4.3.4.3 Project Impacts and Mitigation Measures

***Threshold 1: The project would not conflict with or obstruct implementation of an applicable air quality plan~~?~~.***

## County Park and Trails and Open Space~~/Preserve~~

### Impact Discussion

SDAPCD is required, pursuant to the NAAQS and CAAQS, to reduce emissions of criteria pollutants for which ~~the county~~San Diego County and air basin are in nonattainment (i.e., $O_3$, $PM_{10}$, and $PM_{2.5}$). The most recent SDAPCD air quality attainment plans are the 2016 RAQS and the 2020 $O_3$ attainment plan. The RAQS outlines SDAPCD's plans and control measures designed to attain the CAAQS for $O_3$, while the 2020 $O_3$ attainment plan includes SDAPCD's plans and control measures for attaining the NAAQS for $O_3$. The RAQS and SIP project future emissions and determine the strategies necessary for the reduction of stationary source emissions through regulatory controls. The RAQS relies on the emission projections and control measures outlined in the SIP. CARB mobile source emission projections and SANDAG growth projections in the Regional Plan are based on population and vehicle trends and land use plans developed by the region's cities and by the County ~~of San Diego.~~ The 2020 $O_3$ attainment plan represents SDAPCD's portion of the SIP. The SIP is a comprehensive plan of previously submitted plans, programs (such as monitoring, modeling,

[3] T-BACT is the level of air contaminant emission control or reduction required by state law and SDAPCD rules for new, modified, relocated, and replacement emission sources. Examples of T-BACT include diesel particulate filters, catalytic converters, and selective catalytic reduction technology.

permitting, etc.), district rules, ~~s~~State regulations, and federal controls that describes how each nonattainment area in the ~~s~~State will meet NAAQS, as described in Section 4.3.3.3, *Regional*.

The simplest test to assess project consistency is to determine if the project proposes development that is consistent with the growth anticipated by the relevant land use plans that were used in the formulation of the RAQS and SIP; if so, then the project would be consistent with the RAQS and SIP. Moreover, if the project is consistent with the overarching goals (i.e., to reduce emissions and attain NAAQS and CAAQS) and strategies (i.e., measures implemented to reduce emissions), then the project would be consistent with the RAQS and SIP.

The project site is within the ~~jurisdiction~~boundaries of the County ~~of San Diego~~ Alpine Community Plan~~,~~, which designates the site as Semi-Rural Residential (SR-2). Zoning for the site is A70, Limited Agricultural Use, and S80, Open Space. "Community Recreation," which allows for recreational, social or multi-purpose uses, is consistent with the activities anticipated at the project site, and is an allowable use subject to a Major Use Permit within land zoned A70 (County of San Diego 2021). Therefore, the project would not conflict with existing land use or zoning for the project site. Furthermore, SANDAG's Regional Plan established a long-range blueprint for the San Diego region's growth and development through the year 2050. Because the project would not include any components that would result in substantial unplanned population growth, it would be consistent with the 2050 RTP. In addition, the project would have less than significant impacts related to vehicle miles traveled (VMT), which would be consistent with the goals of Senate Bill (SB) 375 and SANDAG's Regional Plan.

SDAPCD adopts rules and regulations based on the RAQS reduction measures. Implementation of the project would require compliance with applicable SDAPCD rules and regulations, which would reduce criteria pollutant emissions generated during construction and operation. For example, Rule 55 prohibits construction or demolition activity that would discharge into the atmosphere, beyond the property line, dust emissions of 10% opacity or greater for a period of 3 minutes in any 60-minute period. Rule 55 also requires minimization of visible roadway dust because of active operations that generate fugitive dust.

Overall, the project would be consistent with existing land use designations and zoning; thus, the project would be consistent with the growth projections included in the RAQS and SIP.

## Impact Determination

Impacts would be less than significant.

## Mitigation Measures

No mitigation is required.

## Level of Significance After Mitigation

Impacts would be less than significant.

***Threshold 2: The project would not result in a cumulatively considerable net increase of criteria pollutants for which the project region is nonattainment under an applicable federal or ~~s~~State ambient air quality standard~~?~~.***

## County Park and Trails and Open Space~~/Preserve~~

### Impact Discussion

#### Construction

Construction activities would generate criteria pollutant emissions from off-road equipment exhaust, construction workers' vehicles and heavy-duty trucks traveling to and from the project site, the application of architectural coatings, and paving activities. Fugitive $PM_{10}$ and $PM_{2.5}$ dust would also be generated during soil movement and disturbance. The amount of emissions generated on a daily basis would vary, depending on the intensity and types of construction activities occurring simultaneously. Maximum daily emissions typically occur during phases with the greatest intensity of construction activities as well as when multiple construction phases take place on the same day. The estimated maximum daily criteria air pollutant emissions that would be generated during the project's construction are shown in Table 4.3-5. As shown, construction of the project on the maximum day would result in emissions that would not exceed the County SLTs.

**Table 4.3-5. Estimated Maximum Daily Construction Emissions**

| | | Maximum Daily Emissions (pounds per day)[1,2] | | | | | |
|---|---|---|---|---|---|---|---|
| | Construction Phase | ROG | $NO_X$ | CO | $SO_X$ | $PM_{10}$ | $PM_{2.5}$ |
| 2022 | Grubbing/Land Clearing | 2 | **20** | 11 | **<1** | **3** | **1** |
| | Grading/Excavation | 4 | **46** | 30 | **<1** | **3** | **2** |
| | Sewer Line Installation | 1 | **6** | 8 | **<1** | **<1** | **<1** |
| 2023 | Grading/Excavation | 4 | 41 | **29** | <1 | 3 | 2 |
| | Sewer Line Installation | 1 | 5 | **8** | <1 | <1 | <1 |
| | Drainage/Utilities/Subgrade | 1 | 11 | **16** | <1 | 1 | 1 |
| | Building Construction | **2** | 15 | 17 | <1 | 1 | 1 |
| | Paving | **1** | 6 | 8 | <1 | <1 | <1 |
| | Architectural Coating | **13** | 2 | 3 | <1 | <1 | <1 |
| 2024 | Building Construction | 2 | 14 | 17 | <1 | 1 | 1 |
| | Paving | 1 | 5 | 8 | <1 | <1 | <1 |
| | Architectural Coating | 13 | 2 | 3 | <1 | <1 | <1 |
| | **Maximum Daily Emissions** | **15** | **72** | **53** | **<1** | **6** | **3** |
| | County SLTs | 75 | 250 | 550 | 250 | 100 | 55 |
| | **Exceeds Thresholds?** | **No** | **No** | **No** | **No** | **No** | **No** |

Source: Modeling files provided in Appendix C.
[1] Totals may not add up exactly because of rounding.
[2] Bold underlined values indicate which phases contribute to maximum daily emissions.

### Operations

Long-term emissions would be caused primarily by vehicle trips associated with park visitors, with additional emissions from area sources (e.g., cleaning supplies, architectural coatings, and landscape maintenance equipment). As shown in Table 4.3-6, the project's operational emissions would not exceed County SLTs.

**Table 4.3-6. Estimated Maximum Daily Operational ~~Emissions~~**

| | Maximum Daily Emissions (pounds per day)[1] | | | | | |
|---|---|---|---|---|---|---|
| Source | ROG | $NO_X$ | CO | $SO_X$ | $PM_{10}$ | $PM_{2.5}$ |
| Area | <1 | <1 | <1 | <1 | <1 | <1 |
| Mobile | <1 | 2 | 7 | <1 | 2 | <1 |
| **Daily Operational Emissions** | **1** | **2** | **7** | **<1** | **2.19** | **<1** |
| County SLTs | 75 | 250 | 550 | 250 | 100 | 55 |
| **Exceeds Thresholds?** | **No** | **No** | **No** | **No** | **No** | **No** |

Source: Modeling files provided in Appendix C.
[1] Totals may not add up exactly because of rounding.

The SDAB currently has a nonattainment status for the $O_3$ NAAQS and CAAQS, $PM_{10}$ CAAQS, and $PM_{2.5}$ CAAQS. As shown in Tables 4.3-5 and 4.3-6, the project's construction and operational emissions would be below the County SLTs for all pollutants, including ozone precursors (ROG and $NO_X$), $PM_{10}$, and $PM_{2.5}$. Furthermore, project operations would not result in CO hotspots (as discussed under *Threshold 3*, below). Therefore, the project's construction and operations emissions would not result in a cumulatively considerable net increase in criteria pollutants and cumulative impacts would be less than significant.

## Impact Determination

Impacts would be less than significant.

## Mitigation Measures

No mitigation is required.

## Level of Significance After Mitigation

Impacts would be less than significant.

***Threshold 3: The project would not expose sensitive receptors to substantial pollutant concentrations~~?~~.***

## County Park and Trails and Open Space~~/Preserve~~

### Impact Discussion

#### Construction

As discussed previously, DPM is classified as a carcinogenic TAC by CARB and is the primary pollutant of concern with regard to health risks to sensitive receptors during project construction. Diesel-powered construction equipment as well as heavy duty truck movement and hauling would emit DPM that could potentially expose nearby sensitive receptors to pollutant concentrations. The closest sensitive receptors are residences located adjacent to the northeast and south of the project site across South Grade Road.

Construction activities would be temporary in nature (lasting approximately 16 months) and are expected to occur sporadically throughout the construction duration, which is much shorter than the assumed 70-year exposure period used to estimate lifetime cancer risks. Additionally, development associated with the project would occur throughout the entire 25 acres of the active park, and would not be concentrated along the project boundary for an extended period. Once construction activities have ceased, so too ~~would~~ will the DPM emission sources. Overall, exposure to construction emissions would be nominal.

#### Operations

Long-term operations of the project would involve operation of a park and use of park amenities. These types of uses would not be associated with TACs.

#### Carbon Monoxide Hotspots

The project would not place receptors within 500 feet of a signalized intersection with more than 3,000 peak-hour trips that operates at or below LOS E. Likewise, the project would not cause intersections with more than 3,000 intersection peak-hour trips to operate at or below a LOS E. The project therefore satisfies the ~~County of San Diego's~~County's CO hotspot screening criteria.

### Impact Determination

Impacts would be less than significant.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

Impacts would be less than significant.

***Threshold 4: The project would result in emissions (such as those leading to odors) adversely affecting a substantial number of people~~?~~.***

## County Park and Trails and Open Space~~/Preserve~~

### Impact Discussion

Although offensive odors rarely cause any physical harm, they can be unpleasant, leading to considerable distress among the public and often generating citizen complaints to local governments and air districts. According to CARB, land uses associated with odor complaints typically include sewage treatment plants, landfills, recycling facilities, waste transfer stations, refineries, biomass operations, autobody shops, coating operations, fiberglass manufacturing, foundries, rendering plants, and livestock operations (CARB 2005a). Odor impacts on residential areas and other sensitive receptors, such as hospitals, daycare centers, and schools, warrant the closest scrutiny, but consideration should also be given to other land uses where people may congregate, such as recreational facilities, work sites, and commercial areas.

Potential odor emitters during construction include diesel exhaust and evaporative emissions generated by asphalt paving and the application of architectural coatings. Construction-related activities near existing receptors would be temporary in nature, and construction activities would not result in nuisance odors. During operations, the project's onsite sewer treatment system and equestrian areas have the potential to generate objectionable odors. The onsite sewer treatment system's septic tank and leach field lines would be buried underground, and would not be a source of odors with proper maintenance and operation.

Equestrian areas located in the northern portion of the project site have the potential to generate objectionable odors due to manure. The equestrian staging area would have receptacles for waste and equestrian manure. Improper handling and storage of manure, along with odor migration, may lead to offsite nuisance violations (**Impact-AQ-1**).

### Impact Determination

**Impact AQ-1: Objectionable Odors.** The project may have potentially significant odor impacts related to manure located in the equestrian staging areas and corrals. Impacts would be potentially significant.

### Mitigation Measures

**MM-AQ-1: Prepare and Implement a Manure Management Plan.** ~~The~~ County DPR shall comply with the following best management practices, which will be documented in a Manure Management Plan:

- The equestrian areas, including the staging area and horse corrals, shall be cleaned at least once per day including the removal of manure.
- Any visible manure throughout the equestrian area and surrounding trails shall be removed and placed either in a manure bin, or a vegetated area (compost).
- Manure stockpiled in receptacles shall be covered with a lid or tarp. Receptacles shall be located at the farthest feasible distance from nearby residents and/or sensitive receptors.

- Equestrian users shall be reminded to pick up after their animals.
- Each manure bin shall be checked for capacity, and the surrounding areas will be kept clean and tidy.

### Level of Significance After Mitigation

Impacts would be less than significant.

## 4.3.5 Summary of Significant Impacts

**Table 4.3-7. Summary of Significant Air Quality Impacts and Mitigation Measures**

| Summary of Potentially Significant Impact(s) | Summary of Mitigation Measure(s) | Level of Significance After Mitigation | Rationale for Finding After Mitigation |
|---|---|---|---|
| **Impact AQ-1: Objectionable Odors** | **MM-AQ-1: Prepare and Implement a Manure Management Plan** | Less than Significant | Implementation **of MM-AQ-1** and disposal of manure from equestrian areas would reduce manure odors. |

# Section 4.4
# Biological Resources

## 4.4.1 Overview

This section describes existing conditions at the project site, applicable laws and regulations with respect to biological resources, the biological resources present within the project site, and the impacts and mitigation measures required for implementation of the project.

## 4.4.2 Existing Conditions

A biological resource analysis was conducted for the project by reviewing literature and records from available databases and resources, and conducting biological resource surveys within the Biological Survey Area (BSA). The BSA includes the entirety of the ~~approximately~~ 96.6-acre project site. Note that only 94.2 net acres required surveys because 2.4 acres of the parcel is within the public right-of-way along South Grade Road. Vegetation surveys, special-status plant surveys, and invasive plant mapping were conducted in February and March 2019. Special-status plant surveys and special-status wildlife surveys were conducted in the BSA between February and September 2019, with the second-year Quino checkerspot butterfly (QCB) (*Euphydryas editha quino*) study conducted in March 2020 and a specialized survey for chocolate lily (*Fritillaria biflora*) conducted in late March 2021. Additional Engelmann oak surveys and mapping were conducted in June and September 2020. An additional vegetation survey was conducted in June and July 2022 to update vegetation conditions within the BSA and confirm that the mapping met a 0.10-acre minimum mapping unit requirement. Focused surveys for western spadefoot (*Spea hammondii*) were also conducted in 2022. The methods used during these biological resource surveys are provided in the Biological Resources Report (BRR), which is included as Appendix D to ~~this~~the Recirculated Draft EIR.

### 4.4.2.1 Physical Conditions

The BSA is in the central foothills of San Diego County, within the unincorporated community of Alpine. The natural setting of the southern portion of the BSA consists of relatively flat grasslands that slope slightly from northeast to a low point to the southwest. The terrain is rougher to the north; boulders and rock outcrops are dominated by scrub, chaparral, and woodland vegetation. Furthermore, the hills are steeper to the north; a small hilltop is present just east of the northeast corner of the BSA. Land surrounding the BSA is relatively flat, partially because of grading for developments. Steeper mountains with canyons, ravines, and drainages are found farther to the north and the south, outside of Alpine. Nearby reservoirs include El Capitan Reservoir to the north and Loveland Reservoir to the south. Elevations range from approximately 1,900 feet above mean sea level at the southwest corner of the BSA along South Grade Road to approximately 2,100 feet above mean sea level at the northeast corner of the BSA.

Several dirt trails traverse the BSA, most notably in the northern portion. Other trails connect the eastern portion of the property, in areas where many hikers begin their treks to the north, south,

and west and into Wright's Field. South Grade Road, a paved two-lane road, borders the BSA to the south and east.

### 4.4.2.2 Current Fire Fuel Reduction Zones

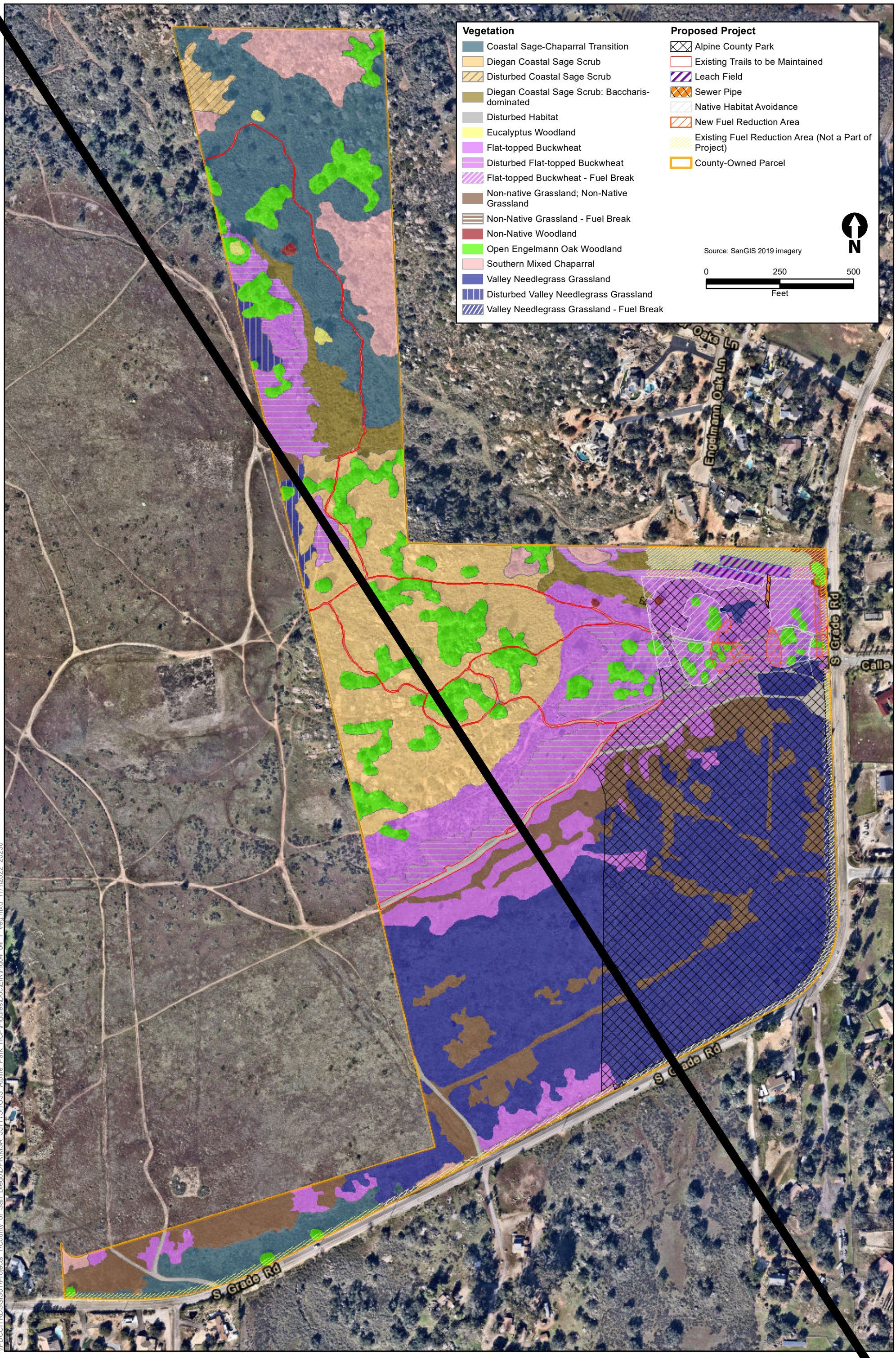
In accordance with the County Consolidated Fire Code and the Alpine Fire Protection District Ordinance, the County ~~is clearing~~clears vegetation within the fire fuel reduction zones listed below, which, historically, have been cleared per the direction of the Alpine Fire District. These recommendations are also contained within the Fire and Emergency Operational Assessment (FEOA~~}~~) prepared by Rohde & Associates.

- At the far northeast edge of the County's parcel where it abuts residences along Engelmann Oak Lane, 100 feet south of their property lines. This area is currently cleared of all vegetation and mapped as disturbed habitat.
- Along South Grade Road, within 30 feet of the edge of the road. This area along the County's parcel includes predominantly Valley needlegrass grassland and smaller stands of open Engelmann oak woodland at the northern and eastern edges that transitions to denser scrub vegetation. Moderate to steep slopes are found toward the southern and western edges of the County's parcel. No Engelmann oaks have been removed as part of clearing, but the trees are limbed in coordination with a certified arborist, as needed, to prevent wildfires from spreading along contiguous tree canopies.

### 4.4.2.3 Vegetation Communities/Land Cover

Vegetation mapping within the BSA was conducted by ICF biologists in February and March 2019 by walking meandering transects and observing the area from selected vantage points that allowed an expansive view of the BSA. An additional vegetation survey was conducted in June and July 2022 to update vegetation conditions within the BSA and confirm that the mapping met a 0.10-acre minimum mapping unit requirement.

Vegetation communities were mapped pursuant to County guidelines (County of San Diego 2010b). These communities were described and assigned numerical codes, according to the *Terrestrial Natural Communities of California* (Holland 1986), as modified by Oberbauer et al. (2008). The 11 general vegetation communities/land cover types observed within the BSA were disturbed habitat; Diegan coastal sage scrub; Diegan coastal sage scrub, *Baccharis* dominated; flat-topped buckwheat; coastal sage-chaparral transition; southern mixed chaparral; Valley needlegrass grassland; non-native grassland; open Engelmann oak woodland; non-native woodland; and eucalyptus woodland (Figure 4.4-1~~;~~, Table 4.4-1). A full description of each vegetation community/land cover type present within the BSA can be found in the BRR, which is included as Appendix D to ~~this~~the Recirculated Draft EIR. Valley needlegrass grassland is the most common vegetation community, composing approximately 26.1 acres of the BSA.

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COUNTY OF SAN DIEGO PARKS AND RECREATION

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**Figure 4.4-1**
**Vegetation Communities**
**Alpine Park Project**

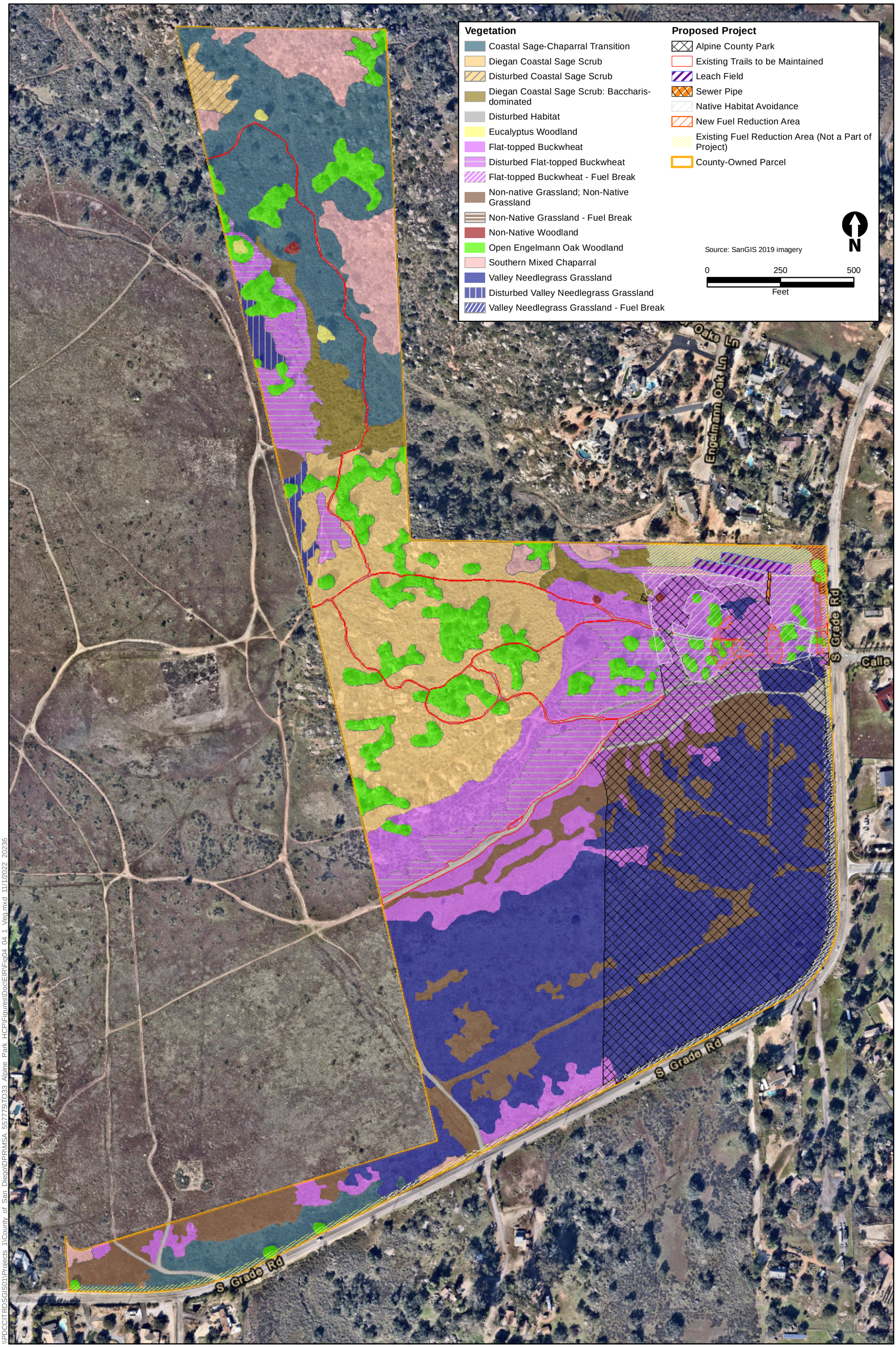


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**Figure 4.4-1**
**Vegetation Communities**
**Alpine Park Project**

**Table 4.4-1. Vegetation Communities Occurring Within the BSA**

| Oberbauer Code | Vegetation Community | Area in BSA (acres) |
|---|---|---|
| 11300 | Disturbed Habitat | 2.7 |
| 32500 | Diegan Coastal Sage Scrub | 12.2 |
| | Disturbed Diegan Coastal Sage Scrub | 0.5 |
| 32530 | Diegan Coastal Sage Scrub, Baccharis dominated | 2.5 |
| 32800 | Flat-topped Buckwheat | 10.1 |
| | Disturbed Flat-topped Buckwheat | 9.1 |
| | Flat-topped Buckwheat – Existing Fire Fuel Reduction Zone | 0.2 |
| 37G00 | Coastal Sage-Chaparral Transition | 11.0 |
| 37120 | Southern Mixed Chaparral | 4.0 |
| 42110 | Valley Needlegrass Grassland | 24.4 |
| | Disturbed Valley Needlegrass Grassland | 0.7 |
| | Valley Needlegrass Grassland – Existing Fire Fuel Reduction Zone | 1.1 |
| 42200 | Non-Native Grassland | 8.4 |
| | Non-native Grassland – Existing Fire Fuel Reduction Zone | < 0.1 |
| 71181 | Open Engelmann Oak Woodland | 7.1 |
| 79000 | Non-Native Woodland | 0.2 |
| 79100 | Eucalyptus Woodland | 0.1 |
| Total[1a] | | 94.2 |

[a.] Sum of values does not equal total because of rounding.

# 4.4.2.4 Candidate, Sensitive, and Special-Status Species

Special-status species are those plants or animals that have been officially listed, proposed for listing, or identified as candidates for listing as threatened or endangered under provisions of the federal Endangered Species Act (ESA) and the California Endangered Species Act (CESA). Included is any animal listed as a Species of Special Concern or a fully protected species by the ~~s~~State or any plant ranked according to the Rare Plant Ranking System of the California Native Plant Society (CNPS). Special-status species also include those listed on the County's Sensitive Plant List and Sensitive Animal List.

## Special-Status Plant Species

The desktop analysis for sensitive plant species was performed for this project by reviewing the California Natural Diversity Database (CNDDB) and CNPS database. The CNDDB and CNPS record search for sensitive plant species was conducted using the U.S. Geological Survey's Alpine 7.5-minute quadrangle map and the nine surrounding quadrangle maps. The search identified 83 species with potential to occur within the BSA (see Appendix I of the BRR, which is included as Appendix D to ~~this~~the Recirculated Draft EIR).

Special-status plant surveys were conducted within the BSA by qualified ICF botanists between April and August 2019. ICF botanists traversed the BSA from meandering transects to identify the locations of special-status plants. A specialized survey for chocolate lily (*Fritillaria biflora*) was conducted in late March of 2021, during the peak time for this species to bloom throughout the BSA. Species that were not observed within the BSA were determined to have little to no potential to

occur on site because three thorough special-status plant surveys were conducted in 2019, which was an excellent rain year for Southern California. The surveys concluded that no federally or ~~s~~State-listed endangered or threatened plant species were observed within the BSA. The following eight sensitive plant species were observed in the BSA, including seven sensitive plant species listed in the California Rare Plant Ranking (CRPR) and in the County Sensitive Plant Lists, and one species only listed on County List D (Figure 4.4-2~~).~~). Decumbent goldenbush (*Isocoma menziesii* var*. decumbens*) and delicate clarkia (*Clarkia delicata*) are listed as CRPR 1B.2 and County List A. Five plants of limited distribution are listed as CRPR 4 and County List D including Engelmann oak (*Quercus engelmannii*), Palmer's grapplinghook (*Harpagonella palmeri*), San Diego County viguiera (*Bahiopsis laciniata*), small-flowered microseris (*Microseris douglasii* ssp*. ~~p~~Platycarpha*), and Southern California black walnut (*Juglans californica*). Chocolate lily (*Fritillaria biflora*), which was observed within the BSA, is a County List D plant, indicating it has a limited distribution or is uncommon but not presently rare or endangered. A complete list of potentially occurring special-status plants is provided in Appendix I of the BRR (Appendix D to ~~this~~the Recirculated Draft EIR).

**Special-Status Plants**

- Chocolate lily
- Delicate clarkia
- Engelmann oak tree
- Engelmann oak tree (dead)
- Palmer's grapplinghook
- San Diego County viguiera
- Southern California black walnut
- decumbent goldenbush
- small-flowered microseris
- Engelmann oak stand
- Palmer's grapplinghook
- San Diego County viguiera
- Decumbent goldenbush

**Proposed Project**

- Alpine County Park
- Existing Trails to be Maintained
- Leach Field
- Sewer Pipe
- Native Habitat Avoidance
- New Fuel Reduction
- Existing Fuel Reduction Area (Not a Part of Project)
- Project Site

Source: County DPR, 2021; ICF, 2021; Imagery-SANDAG, 2020.

SOUTH GRADE RD

0 100 200 Feet
1 in = 300 ft

N

**Figure 4.4-2**
**Special-Status Plants**
**Alpine Park Project**

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**Special-Status Plants**

- Chocolate lily
- Delicate clarkia
- Engelmann oak tree
- Engelmann oak tree (dead)
- Palmer's grapplinghook
- San Diego County viguiera
- Southern California black walnut
- decumbent goldenbush
- small-flowered microseris
- Engelmann oak stand
- Palmer's grapplinghook
- San Diego County viguiera
- Decumbent goldenbush

**Proposed Project**

- Alpine County Park
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- Leach Field
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Source: County DPR, 2021; ICF, 2021; Imagery-SANDAG, 2020.

SOUTH GRADE RD

0 100 200 Feet
1 in = 300 ft

N

**Figure 4.4-2**
**Special-Status Plants**
**Alpine Park Project**

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## Special-Status Wildlife Species

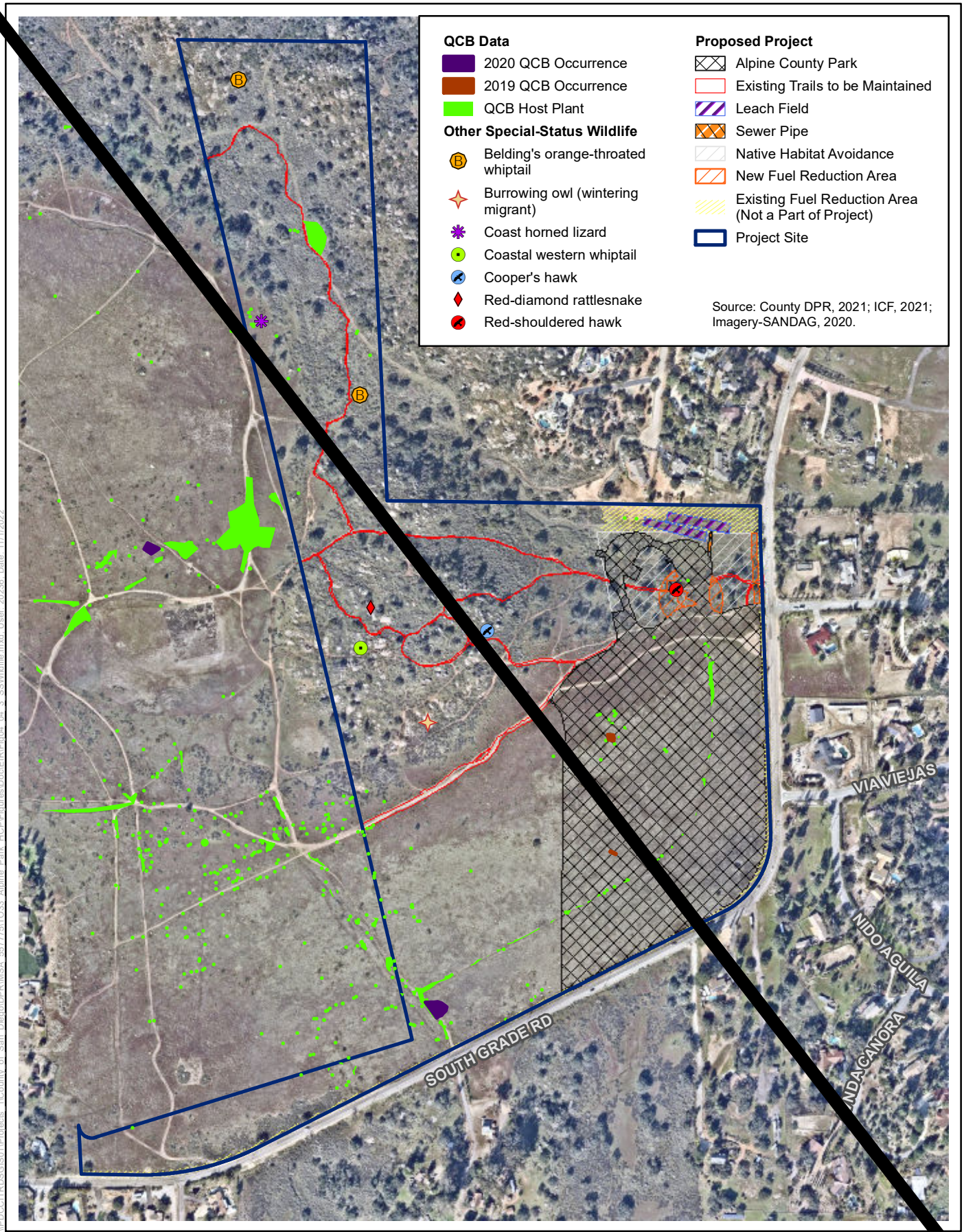
Following a thorough literature and records search (see the BRR, which is included as Appendix D to ~~this~~the Recirculated Draft EIR), special-status wildlife surveys for the project were conducted between February and September 2019, with second-year of QCB and Hermes copper butterfly (HCB) (*Lycaena hermes*) studies conducted in 2020. ICF biologists conducted focused wildlife surveys for locally endemic and listed San Diego and Riverside fairy shrimp (*Streptocephalus woottoni*, *Branchinecta sandiegonensis*), QCB, HCB, burrowing owl (*Athene cunicularia*), coastal California gnatcatcher (CAGN) (*Polioptila californica californica*), and locally endemic listed bat species. In 2022, focused surveys for western spadefoot were conducted, verification and refinement to the vegetation map was completed, and an additional bat survey was conducted. The BRR (Appendix D to ~~this~~the Recirculated Draft EIR) provides details on the methods used for these surveys. QCB was observed during both 2019 and 2020 (Figure 4.4-3~~).~~).

The following special-status bats were observed during bat surveys: big free-tailed bat (*Nyctinomops macrotis*), pallid bat (*Antrozous pallidus*), pocketed free-tailed bat (*Nyctinomops femorosaccus*), Townsend's big-eared bat (*Corynorhinus townsendii*), western long-eared myotis (*Myotis evotis*), western mastiff bat (*Eumops perotis*), western red bat (*Lasiurus blossevillii*), western small-footed myotis (*Myotis ciliolabrum*), western yellow bat (*Lasiurus xanthinus*), and Yuma myotis (*Myotis yumanensis*). Western spadefoot adults were observed within the BSA but outside the project footprint. No evidence of breeding western spadefoot was observed in 2022. In 2019, which was an exceptionally wet year, western spadefoot eggs were observed within one seasonally inundated basin during one survey.

The following special-status wildlife species were incidentally observed within the BSA during surveys conducted in 2019 and 2020: Belding's orange-throated whiptail (*Aspidoscelis hyperythra*), Blainville's (coast) horned lizard (*Phrynosoma blainvillii*), coastal western whiptail (*Aspidoscelis tigris stejnegeri*), red-diamond rattlesnake (*Crotalus ruber*), a wintering migrant burrowing owl, Cooper's hawk (*Accipiter cooperii*), red-shouldered hawk (*Buteo lineatus*), and western bluebird (*Sialia mexicana*) (Figure 4.4-3).

Although not observed, the following special-status species were determined to have moderate or high potential to occur within the BSA, based on habitat types and range distribution: Baja California coachwhip (*Masticophis fuliginosus*), California glossy snake (*Arizona elegans occidentalis*), coast patch-nosed snake (*Salvadora hexalepis virgultea*), Coronado skink (*Plestiodon skiltonianus interparietalis*), Southern California legless lizard (*Anniella stebbinsi*), Bell's sage sparrow (*Artemisiospiza belli belli*), burrowing owl (breeding occurrence), ferruginous hawk (*Buteo regalis*), grasshopper sparrow (*Ammodramus savannarum*), Lawrence's goldfinch (*Spinus lawrencei*), Oregon vesper sparrow (*Pooecetes gramineus affinis*), Southern California rufous-crowned sparrow (*Aimophila ruficeps canescens*), white-tailed kite (*Elanus leucarus*), northwestern San Diego pocket mouse (*Chaetodipus fallax fallax*), San Diego black-tailed jackrabbit (*Lepus californicus bennettii*), and Bryant's (San Diego desert) woodrat (*Neotoma bryanti*).

Protocol surveys for both listed fairy shrimp and CAGN were negative. Based on survey results and a literature review, the following species were determined to have low potential to occur; therefore, impacts on these species are not evaluated in this Final EIR: HCB, locally endemic and listed San Diego and Riverside fairy shrimp, and CAGN. Appendix I in the BRR (Appendix D to ~~this~~the Recirculated Draft EIR) provides a complete discussion regarding all special-status wildlife species with potential to occur and those that were observed.

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1 in = 500 ft

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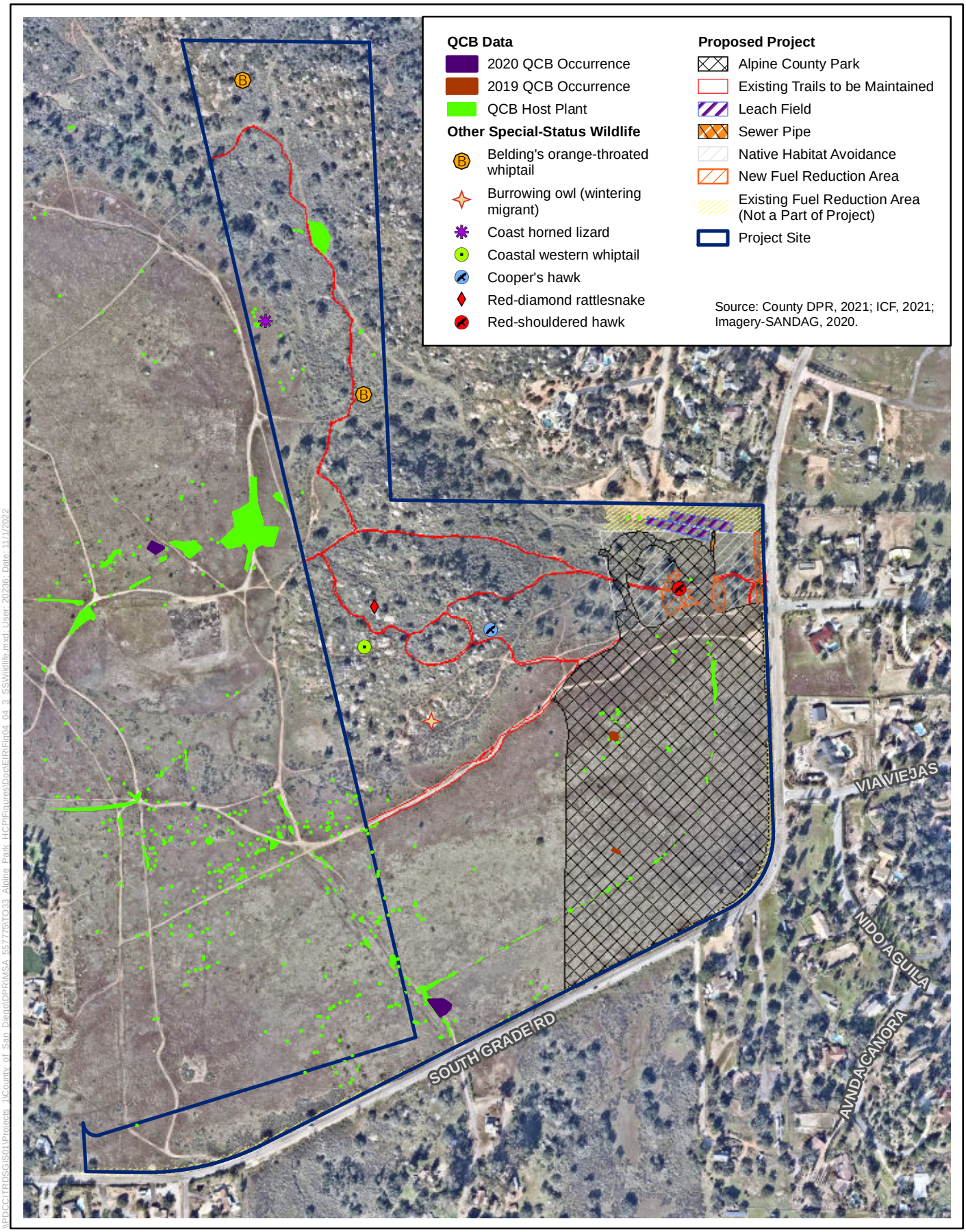
**Figure 4.4-3**
**Special-Status Wildlife**
**Alpine Park Project**

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0 250 500 Feet
1 in = 500 ft

**Figure 4.4-3**
**Special-Status Wildlife**
**Alpine Park Project**

#### 4.4.2.5 Jurisdictional Waters and Wetlands

During the vegetation mapping conducted in February and March 2019, ICF biologists searched the BSA for any indication of surface water flows to determine if a delineation of potentially jurisdictional aquatic features was required. No such surface water features were observed on-site; as a result, no formal delineation of jurisdictional water features was required or conducted.

## 4.4.3 Applicable Laws and Regulations

### 4.4.3.1 Federal

#### Endangered Species Act of 1973

The ESA was enacted in 1973 to provide protection to threatened and endangered species and their associated ecosystems. "Take" of a listed species is prohibited, except when authorization has been granted through a permit under Section 4(d), 7, or 10(a) of the act. *Take* means to harass, harm, shoot, wound, kill, trap, capture, or collect or to attempt to engage in any of these activities without a permit.

#### Migratory Bird Treaty Act

The Migratory Bird Treaty Act (MBTA) was enacted in 1918. Its purpose is to prohibit the killing or transport of covered native migratory birds—or any part, nest, or egg of any such bird—unless allowed by another regulation adopted in accordance with the MBTA. The list of species that are protected by this act includes almost all native non-game species.

#### Clean Water Act

In 1948, Congress first passed the Federal Water Pollution Control Act. This act was amended in 1972 and became known as the Clean Water Act (CWA). The CWA regulates the discharge of pollutants into the waters of the U.S. Under Section 404, permits need to be obtained from the U.S. Army Corps of Engineers (USACE) for discharge of dredge or fill material into waters of the U.S. Under Section 401 of the act, water quality certification from the Regional Water Quality Control Board (RWQCB) needs to be obtained if there are to be any impacts on waters of the U.S.

### 4.4.3.2 State

#### California Endangered Species Act

The CESA prohibits the take of any species that the California Fish and Game Commission determines to be a threatened or endangered species; CESA is administered by the California Department of Fish and Wildlife (CDFW). The CESA is found in California Fish and Game Code (FGC) Sections 2050–2116. Incidental take of these listed species can be approved by CDFW. The CESA definition of take means to hunt, pursue, catch, capture, or kill or attempt to hunt, pursue, catch, capture, or kill.

### California Fish and Game Code

The California FGC regulates the taking or possessing of birds, mammals, fish, amphibians, and reptiles. It also provides additional protections for endangered species and regulations regarding lakes and streams and associated fish and wildlife habitat. Provisions regarding the protections for nesting birds are described in California FGC Section 3503; these make it unlawful to take, possess, or needlessly destroy the nest or eggs of most wild birds.

## ~~4.4.3.3 Local~~ Regional

## 4.4.3.3 ~~County~~

### Multiple Species Conservation Program

The project is within the planning boundaries of the Multiple Species Conservation Program (MSCP) County Subarea Plan, and the proposed open space area associated with the project will add to the network of preserved land in the area. The project is within a designated Pre-Approved Mitigation Area.

The MSCP is a cooperative habitat program that encompasses 582,000 acres and establishes a 172,000-acre preserve system in southwestern San Diego County. The MSCP covers 85 plant and animal species and 23 vegetation communities. Agencies participating in the MSCP include the County, other local jurisdictions, the U.S. Fish and Wildlife Service (USFWS), and CDFW.

Local jurisdictions and special districts implement their respective portions of the MSCP through Subarea plans (County 1997), which describe specific implementing mechanisms for the MSCP. The combination of the subregional MSCP Plan and Subarea plans serve as a Multiple Species Habitat Conservation Program pursuant to Section 10(a)(1)(B) of the ESA, the Natural Community Conservation Planning Program pursuant to the California Natural Community Conservation Planning Act of 1991, and the CESA. The 96.6-acre project site is fully owned and operated by County DPR.

## 4.4.3.4 Local

### County of San Diego General Plan

The 2011 County General Plan Update is the first comprehensive update to the County General Plan since the 1970s. The County General Plan Update, which applies to all unincorporated portions of San Diego County, directs population growth and provides plans for infrastructure needs, development, and resource protection. The County General Plan Update guides the growth and development of the unincorporated ~~San Diego County~~area by using innovative planning principles that have been designed to create livable communities and balance environmental objectives with the need for adequate infrastructure, housing, agriculture, and economic viability. The County General Plan Update consists of ~~six~~seven elements: Land Use, Mobility, Housing, Conservation and Open Space, Safety, ~~and~~ Noise, and Environmental Justice.

The goals and policies from the County General Plan listed below are applicable to the discussion of biological resources.

## Land Use

**GOAL LU-2 Maintenance of the County's Rural Character.** Conservation and enhancement of the unincorporated County's varied communities, rural setting, and character.

**LU-2.2 Relationship of Community Plans to the General Plan.** Community Plans are part of the General Plan. These plans focus on a particular region or community within the overall General Plan area. They are meant to refine the policies of the General Plan as they apply to a smaller geographic region and provide a forum for resolving local conflicts. As legally required by state law, Community Plans must be internally consistent with General Plan goals and policies of which they are a part. They cannot undermine the policies of the General Plan. Community Plans are subject to adoption, review and amendment by the Board of Supervisors in the same manner as the General Plan.

**LU-2.8 Mitigation of Development Impacts.** Require measures that minimize significant impacts to surrounding areas from uses or operations that cause excessive noise, vibrations, dust, odor, aesthetic impairment and/or are detrimental to human health and safety.

**GOAL LU-6 Development—Environmental Balance.** A built environment in balance with the natural environment, scarce resources, natural hazards, and the unique local character of individual communities.

**LU-6.1 Environmental Sustainability.** Require the protection of intact or sensitive natural resources in support of the long-term sustainability of the natural environment.

**LU-6.6 Integration of Natural Features into Project Design.** Require incorporation of natural features (including mature oaks, indigenous trees, and rock formations) into proposed development and require avoidance of sensitive environmental resources.

**LU-6.7 Open Space Network.** Require projects with open space to design contiguous open space areas that protect wildlife habitat and corridors; preserve scenic vistas and areas; and connect with existing or planned recreational opportunities.

**GOAL LU-10 Function of Semi-Rural and Rural Lands.** Semi-Rural and Rural Lands that buffer communities, protect natural resources, foster agriculture, and accommodate unique rural communities.

**LU-10.2 Development—Environmental Resource Relationship.** Require development in Semi-Rural and Rural areas to respect and conserve the unique natural features and rural character, and avoid sensitive or intact environmental resources and hazard areas.

## Conservation and Open Space

**GOAL COS-2 Sustainability of the Natural Environment.** Sustainable ecosystems with long-term viability to maintain natural processes, sensitive lands, and sensitive as well as common species, coupled with sustainable growth and development.

**COS-2.1 Protection, Restoration and Enhancement.** Protect and enhance natural wildlife habitat outside of preserves as development occurs according to the underlying land use designation. Limit the degradation of regionally important natural habitats within the Semi-Rural and Rural Lands regional categories, as well as within Village lands where appropriate.

**COS-2.2 Habitat Protection through Site Design.** Require development to be sited in the least biologically sensitive areas and minimize the loss of natural habitat through site design.

**GOAL COS-21 Park and Recreational Facilities.** Park and recreation facilities that enhance the quality of life and meet the diverse active and passive recreational needs of County residents and visitors, protect natural resources, and foster an awareness of local history, with approximately ten acres of local parks and 15 acres of regional parks provided for every 1,000 persons in the unincorporated County.

~~**COS-21.4** Regional **Parks.** Require new regional parks to allow for a broad range of recreational activities and preserve special or unique natural or cultural features when present.~~

**COS-21.5 Connections to Trails and Networks.** Connect public parks to trails and pathways and other pedestrian or bicycle networks where feasible to provide linkages and connectivity between recreational uses.

**GOAL COS-23 Recreational Opportunities in Preserves.** Acquisition, monitoring, and management of valuable natural and cultural resources where public recreational opportunities are compatible with the preservation of those resources.

**COS-23.1 Public Access.** Provide public access to natural and cultural (where allowed) resources through effective planning that conserves the County's native wildlife, enhances and restores a continuous network of connected natural habitat and protects water resources.

## County of San Diego Biological Mitigation Ordinance

The County adopted the Biological Mitigation Ordinance (BMO) in 2010 to protect the County's biological resources and prevent their degradation and loss by guiding development outside of a Biological Resource Core Area (BRCA) and by establishing mitigation standards that will be applied to discretionary projects (County of San Diego 2010a).

Adoption and implementation of the BMO enables the County to achieve the conservation goals set forth in the Subarea Plan for the MSCP and sets forth the criteria for avoiding impacts on BRCAs and on plant and animal populations within those areas. The BMO also stipulates the mitigation requirements (ratios) for all projects requiring a discretionary permit. Mitigation ratios vary based on whether the project and proposed mitigation lands are within a BRCA. The 96.6-acre site qualifies as a BRCA as defined in the BMO.

The project is exempt from the provisions in the BMO. Per Section 86.503, of the BMO, the BMO does not apply to a public facility or public project, determined to be essential by the County, such as a County Park or County recreational facility, provided that the County decision-making body considering an application for such a project makes the following findings:

a) The facility or project is consistent with the County General Plan, the MSCP Plan, and Subarea Plan;

b) All feasible mitigation measures have been incorporated into the facility or project, and there are no feasible, less environmentally damaging locations, alignments, or non-structural alternatives that would meet project objectives;

c) Where the facility or project encroaches into a wetland or floodplain, mitigation measures are required that result in a net gain in wetland and/or riparian habitat;

d) Where the facility or project encroaches into steep slopes, native vegetation will be used to revegetate and landscape cut and fill areas;

e) No mature riparian woodland is destroyed or reduced in size due to otherwise allowed encroachments; and

f) All Critical Populations of Sensitive Plant Species Within the MSCP Subarea (Attachment C of Document No. 0769999 on file with the Clerk of the Board); Rare, Narrow Endemic Animal Species Within the MSCP Subarea, (Attachment D of Document No. 0769999 on file with the Clerk of the Board); Narrow, Endemic Plant Species Within the MSCP subarea (Attachment E of Document No. 0769999 on file with the Clerk of the Board); and San Diego County Sensitive Plant Species, as defined herein, will be avoided as required by, and consistent with, the terms of the Subarea Plan.

## Alpine Community Plan

The Alpine Community Plan (ACP) implements the goals and policies of the County General Plan for the Alpine area (County of San Diego 1979). The plan was prepared in accordance with Section 65101 of the Government Code, State of California, and Board of Supervisors Policy I-1. The ACP, amended on December 14, 2016, represents a specific guide for land use, conservation, and circulation; a guide for use by service delivery specialists; and recommendations to facilitate the coordination of plans of other public agencies as well as the private sector. The goals, policies, and recommendations listed below from the ACP are applicable to land use.

### Chapter 1, Community Character

**Policy/Recommendation 1:** Regulatory agencies shall ensure that future projects are consistent with the goals, policies and recommendations contained in the Alpine Community Plan. [PP]

**Policy/Recommendation 4:** Site designs should:

a. Grading shall not unduly disrupt the natural terrain, or cause problems associated with runoff, drainage, erosion, or siltation. Landscape disturbed by grading shall be revegetated. [PP, C, DPW]

b. Have grading plans that maximize retention of sensitive native vegetation, existing tree stands, and rock outcroppings, and natural topography. [PP, DPW]

**Policy/Recommendation 6:** Require retention of mature trees in all public and private development projects, wherever possible. [PP, DPW]

### Chapter 9, Conservation

**Goal 1:** Promote the well-planned management of all valuable resources, natural and man-made, and prevent the destruction and wasteful exploitation of natural resources, where feasible.

**Policy/Recommendation 1:** Encourage the protection and conservation of unique resources in the Alpine Planning Area. [AP]

**Policy/Recommendation 2:** Important plant, animal, mineral, water, cultural and aesthetic resources in the Alpine Plan area shall be protected through utilization of the Resource Conservation Area designations and appropriate land usage. [AP]

**Policy/Recommendation 6:** Utilize all measures to preserve rare, threatened, or endangered plant life, including on-site protection through open space easement. Off-site propagation for reintroduction of suitable habitat to be coordinated by the Conservation Subcommittee. [AP, PP]

**Policy/Recommendation 7:** Protect the rare Engleman [sic] oak, wherever possible. [AP, PP]

### Chapter 10, Open Space

**Goal:** Provide a system of open space that preserves the unique natural elements of the community, retains and extends areas in open space that are recognized as valuable for conservation of resources, open space uses that promote public health and safety. Open space areas, along with areas which are inappropriate for urbanization or required as buffers for urban development, that harmonize with and help integrate conservation and recreation components, creating a well-balanced community of natural plant and animal habitat and humans alike.

**Policy/Recommendation 1:** Encourage the development and preservation of a system of open space for wildlife corridors linking residential areas to permanent open space in the Cleveland National Forest and nearby lakes and wildlife preservation areas. [County DPR, AP]

**Policy/Recommendation 3:** Incorporation of open space areas as integral parts of project site designs, preserving environmental resources, providing recreation for residents, and buffers to maintain neighborhood identities. [PP]

**Policy/Recommendation 5:** Incorporate publicly-owned land into a functional recreation/open space system, wherever feasible. [County DPR, AP]

**Policy/Recommendation 11:** Enhance health and safety and conserve natural resources through the preservation of open space. [GEN, County DPR, AP]

**Policy/Recommendation 12:** Provide recreational opportunities through the preservation of open space areas. [County DPR, AP]

**Policy/Recommendation 13:** Preserve and encourage publicly and privately-owned open space easements. [County DPR, AP]

### Chapter 11, Recreation

**Policy/Recommendation 9:** Encourage the acquisition and development of park lands which will protect outstanding scenic and riparian areas, cultural, historical and biological resources. [County DPR, PP]

## 4.4.4 Project Impact Analysis

This section addresses direct and indirect impacts on biological resources that would result from implementation of the project. The impact analysis is focused on project components that would occur within the BSA, including fire management activities, construction and operation of Alpine Park, formalization of approximately 1 acre of existing multi-use trails, establishment of a Native

Habitat Avoidance Area, construction of public restroom facilities, and establishment of an open space~~/preserve~~ on the project site. Each component is described in detail below:

- Alpine Park: ~~The~~ County DPR is proposing development of Alpine Park, an approximately ~~22.2~~25-acre active park within 96.6 acres of undeveloped land. The active park would include amenities such as multi-use turf areas, a baseball field, an all-wheel park, a bike skills area, recreational courts (~~i.e.~~, g., for basketball, pickleball), fitness stations, a leash-free dog area, restroom facilities, an administrative facility/ranger station, equestrian staging area and a corral, a nature play area, a community garden, a volunteer pad, picnic areas with shade structures and picnic tables, game table plaza, and multi-use trails.
- New Fire Fuel Reduction Zones: In accordance with the County Consolidated Fire Code and the Alpine Fire Protection District Ordinance, the County will clear vegetation along South Grade Road, providing an additional 20 feet beyond the existing 30-foot fire fuel modification zone along South Grade Road where it is adjacent to the project footprint and north to the end of the County parcel (see Section 4.4.2.2). The County will also clear vegetation within 100 feet of the volunteer parking pad in the northern portion of the proposed park. This includes "landscape replacement" clearing within 30 feet of the volunteer parking pad in Zone A. No Engelmann oaks are in this zone. Within Zone B, the County will achieve a 75 percent reduction in fire-line intensity out to approximately 100 feet from the volunteer parking pad. Zone B fire fuel reductions will include removing shrub fuels (predominantly flat-topped buckwheat) by a minimum of 50 percent and grass/herb fuels by a minimum of 80 percent. Four Engelmann oak canopies are located in Zone B areas, and three Engelmann oak canopies are located within the additional 20-foot-wide clearing along South Grade Road as described above. Although Engelmann oaks will not be removed for fire fuel reduction purposes, these oaks may be limbed to prevent fire from spreading through the canopies, as needed, in coordination with a certified arborist. These recommendations are also contained in the FEOA prepared by Rohde & Associates, provided as Appendix J of ~~this~~the Recirculated Draft EIR.
- Multi-Use Trails: In addition to the active park, the project would result in the maintenance of approximately 1 acre of existing multi-use trails throughout the project site. A number of smaller informal trails that are currently in use will be closed as part of the project, as well.
- Native Habitat Avoidance Area: These areas are within the generalized boundary of Alpine Park, but they would not be subject to mass grading or vegetation removal during site preparation activities. These areas are at the northern end of the proposed park, adjacent to the proposed equestrian staging area.
- Public Restroom Facilities: Implementation of the project would include construction of public restroom facilities. ~~The~~ County DPR may implement a septic system and associated leach field to accommodate sewage from the proposed restroom facilities. Another option under consideration is for ~~the~~ County DPR to extend a sewer line into the proposed Alpine Park, which would preclude the need for the septic system. For purposes of this analysis, both the sewer line and septic system are considered.
- Open Space~~/Preserve~~: Approximately 67.5 acres of the undeveloped 96.6-acre parcel would be conserved as open space~~/preserve~~ land.

## 4.4.4.1 Methodology

Biological resource impacts can be considered direct, indirect, or cumulative. They are also either permanent or temporary in nature.

**Direct:** Occur when biological resources are altered, disturbed, or destroyed during project implementation. Examples include clearance of vegetation, encroachment into wetland buffers (not applicable on this project), diversion of surface water flows, and the loss of individual species and/or their habitats.

**Indirect:** Occur when project-related activities affect biological resources in a manner that is not direct. Examples include elevated noise and dust levels, increased human activity, decreased water quality, changes to hydrological conditions not resulting in type conversion of vegetation community, and the introduction of invasive wildlife (domestic cats and dogs) and plants.

**Cumulative:** Occur when biological resources are either directly or indirectly affected to a minor extent as a result of a specific project, but the project-related impacts are part of a larger pattern of similar minor impacts. The overall result of these multiple minor impacts from separate projects is considered a cumulative impact on biological resources.

**Temporary:** Temporary impacts can be direct or indirect and are considered reversible. Examples include the removal of vegetation from areas that will be revegetated, elevated noise levels, and increased levels of dust.

**Permanent:** Permanent impacts can be direct or indirect and are not considered reversible. Examples include removing vegetation from areas that will have permanent structures placed on them or landscaping an area with non-native plant species.

All potential project-related impacts (direct, indirect, and cumulative) were evaluated as a part of this assessment. The project would have primarily three classes of impacts: (1) permanent direct impacts on vegetation communities, sensitive plants species, and habitat for sensitive animals; (2) indirect temporary effects on certain sensitive natural communities, sensitive animals, or sensitive plant species from construction-related activities such as dust deposition, increased human presence, and noise associated with construction equipment; and (3) indirect permanent effects resulting from operation of the ~~regional~~ park ~~system~~, such as an increased public presence that may indirectly affect animal movement or behaviors. Table 4.4-2 summarizes the types of impacts associated with this project.

**Table 4.4-2. Summary of Project Components and Associated Impacts**

| General Location | Project Component | Impact Type | Sum of Acres |
|---|---|---|---|
| County Park and Trails | Active Park | Permanent | 22.2 |
| | Leach Field | Permanent | 0.4 |
| | New Fire Fuel Modification Zones | Permanent | 0.5 |
| Total Permanent Impacts | | | 23.1 |
| Open Space~~/Preserve~~ | Native Habitat Avoidance Area | Temporary Indirect | 2.1 |
| | Pipe leading to leach field | Temporary Direct | < 0.1 |

| General Location | Project Component | Impact Type | Sum of Acres |
|---|---|---|---|
| | All other areas | Resource Management/ Habitat Enhancement Activities Only | 65.4 |
| Total Preserved | | | 67.5 |
| Existing Trails to Be Maintained | | Impact Neutral | 1.0 |
| Existing Fuel Reduction Areas (not a part of project) | | N/A | 2.6 |
| **Grand Total** | | | **94.2** |

# 4.4.4.2 Thresholds of Significance

## Appendix G of the CEQA Guidelines

The following significance criteria, based on Appendix G of the CEQA Guidelines, provide the basis for determining the significance of impacts associated with biological resources resulting from the implementation of the project. The determination of whether a biological resource impact would be significant is based on the professional judgment of ~~the~~ County DPR as Lead Agency, supported by the recommendations of qualified personnel at ICF, and substantial evidence in the administrative record.

Impacts are considered significant if the project would result in any of the following:

1. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations or by CDFW or ~~U.S. Fish and Wildlife Service (~~USFWS~~).~~.
2. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by CDFW or USFWS.
3. Have a substantial adverse effect on ~~s~~State or federally protected wetlands (including, but not limited to, marshes, vernal pools, coastal areas, etc.) through direct removal, filling, hydrological interruption, or other means.
4. Interfere substantially with the movement of any native resident or migratory fish or wildlife species, or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.
5. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.
6. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or ~~s~~State Habitat Conservation Plan.

## County of San Diego Guidelines for Determining Significance

According to the County Guidelines for Determining Significance, any of the following conditions would be considered significant (County of San Diego 2010b):

- 3.A. The project would impact one or more individuals of a species listed as federally or ~~s~~State endangered or threatened.

- 3.B. The project would impact an on-site population of a County List A or B plant species, or a County Group I animal species, or a species listed as a ~~s~~State Species of Special Concern.
- 3.C. The project would impact the local long-term survival of a County List C or D plant species or a County Group II animal species.
- 3.D. The project may impact arroyo toad aestivation, foraging, or breeding habitat.
- 3.E. The project would impact golden eagle habitat.
- 3.F. The project would result in a loss of functional foraging habitat for raptors.
- 3.G. The project would impact the viability of a core wildlife area, defined as a large block of habitat that supports a viable population of a sensitive wildlife species or an area that supports multiple wildlife species.
- 3.H. The project would cause indirect impacts to levels that would likely harm sensitive species over the long term.
- 3.I. The project would impact occupied burrowing owl habitat.
- 3.J. The project would impact occupied coastal cactus wren habitat.
- 3.K. The project would impact occupied Hermes copper habitat.
- 3.L. The project would impact nesting success of sensitive animals (as listed in the Guidelines for Determining Significance) through grading, clearing, fire fuel modification, and/or noise generating activities such as construction.
- 4.A. Project-related grading, clearing, construction or other activities would temporarily or permanently remove sensitive native or naturalized habitat on or off the project site.
- 4.B. Any of the following will occur to or within jurisdictional wetlands and/or riparian habitats as defined by USACE, CDFW and the County of San Diego: removal of vegetation; grading; obstruction or diversion of water flow; adverse change in velocity, siltation, volume of flow, or runoff rate; placement of fill; placement of structures; construction of a road crossing; placement of culverts or other underground piping; any disturbance of the substratum; and/or any activity that may cause an adverse change in native species composition, diversity and abundance.
- 4.C. The project would draw down the groundwater table to the detriment of groundwater-dependent habitat, typically a drop of 3 feet or more from historical low groundwater levels.
- 4.D. The project would cause indirect impacts to levels that would likely harm sensitive habitats over the long term.
- 4.E. The project does not include a wetland buffer adequate to protect the functions and values of existing wetlands.
- 5.A. Any of the following will occur to or within jurisdictional wetlands as defined by USACE: removal of vegetation; grading; obstruction or diversion of water flow; adverse change in velocity, siltation, volume of flow, or runoff rate; placement of fill; placement of structures; construction of a road crossing; placement of culverts or other underground piping; any disturbance of the substratum; and/or any activity that may cause an adverse change in native species composition, diversity and abundance.

- 5.B. The project would draw down the groundwater table to the detriment of groundwater-dependent federal wetlands, typically a drop of 3 feet or more from historical low groundwater levels.
- 5.C. The project does not include a wetland buffer adequate to protect the functions and values of existing wetlands.
- 6.A. The project would prevent wildlife access to foraging habitat, breeding habitat, water sources, or other areas necessary for their reproduction.
- 6.B. The project would substantially interfere with connectivity between blocks of habitat or would potentially block or substantially interfere with a local or regional wildlife corridor or linkage.
- 6.C. The project would create artificial wildlife corridors that do not follow natural movement patterns.
- 6.D. The project would increase noise and/or nighttime lighting in a wildlife corridor or linkage to levels proven to affect the behavior of the animals identified in a site-specific analysis of wildlife movement.
- 6.E. The project does not maintain an adequate width for an existing wildlife corridor or linkage and/or would further constrain an already narrow corridor through activities such as (but not limited to) reduction of corridor width, removal of available vegetative cover, placement of incompatible uses adjacent to it, and placement of barriers in the movement path.
- 6.F. The project does not maintain adequate visual continuity (i.e., long lines-of-site) within wildlife corridors or linkage.
- 7.A. For lands outside of the MSCP, the project would impact coastal sage scrub vegetation in excess of the County's 5 percent habitat loss threshold as defined by the Southern California Coastal Sage Scrub Natural Community Conservation Planning (NCCP) Guidelines.
- 7.B. The project would preclude or prevent the preparation of the subregional NCCP. For example, the project proposes development within areas that have been identified by the County or resource agencies as critical to future habitat preserves.
- 7.C. The project will impact any amount of sensitive habitat lands as outlined in the Resource Protection Ordinance (RPO).
- 7.D. The project would not minimize and/or mitigate coastal sage scrub habitat loss in accordance with Section 4.3 of the NCCP Guidelines.
- 7.E. The project does not conform to the goals and requirements as outlined in any applicable Habitat Conservation Plan (HCP), Habitat Management Plan (HMP), Special Area Management Plan (SAMP), Watershed Plan, or similar regional planning effort.
- 7.F. For lands within the MSCP, the project would not minimize impacts to BRCAs, as defined in the BMO.
- 7.G. The project would preclude connectivity between areas of high habitat values, as defined by the Southern California Coastal Sage Scrub NCCP Guidelines.
- 7.H. The project does not maintain existing movement corridors and/or habitat linkages as defined by the BMO.

- 7.I. The project does not avoid impacts to MSCP narrow endemic species and would impact core populations of narrow endemics.
- 7.J. The project would reduce the likelihood of survival and recovery of listed species in the wild.
- 7.K. The project would result in the killing of migratory birds or destruction of active migratory bird nests and/or eggs (Migratory Bird Treaty Act).
- 7.L. The project would result in the take of eagles, eagle eggs or any part of an eagle (Bald and Golden Eagle Protection Act).

# 4.4.4.3 Project Impacts and Mitigation Measures

***Threshold 1: The project would have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations or by the California Department of Fish and ~~Game~~Wildlife or U.S. Fish and Wildlife Service.***

## County Park and Trails

### Impact Discussion

#### Construction

Construction of the active park would require grading equipment for site preparation as well as standard construction equipment, such as earthmoving equipment, tractors, excavators, backhoes, a water truck, drill rig, bobcat, forklift, rollers, a rubber tire loader, wheel tractor scrapers, an air compressor, a generator set, crane, and concrete truck. Construction would result in temporary direct and indirect impacts on the area due to an increase in noise levels, truck traffic, and ground-disturbing activities. Construction would have direct permanent impacts through the removal of native vegetation and habitat with construction of the active park.

Impacts on a maximum of 22.4 acres of native habitats (see Table 4.3-4, below, under Threshold 2) ~~are anticipated~~could occur from construction of the proposed park. The 22.4 acres of impacts represent approximately 4.9 percent of the total available open space and conserved lands within the immediate vicinity of the County's parcel. These existing open space and conserved lands include 1) the Wright's Field Preserve; 2) contiguous privately held open space lands, including some with conservation easements; and 3) the proposed ~~preserve~~open space lands within the remainder of the County's parcel.

As mentioned in Section 3.4, *Project Construction*, the project would be constructed in two phases. Impacts from Phase 1 would occur within the northern portion of the proposed impact area and consist of a maximum of 7.8 acres for construction of the active park, 0.4 acre for installation of the leach field, and 0.5 acre for new fire fuel modifications. Impacts from Phase 2 would occur primarily in the southern portion of the proposed active use park and would consist of a maximum of 14.3 acres from construction of the southern portion of the active use park.

***Special-Status Plant Species***

Of the eight sensitive plant species found within the BSA, two would be permanently and directly affected by implementation of the project: decumbent goldenbush and Palmer's ~~grappling hook.~~grapplinghook. Decumbent goldenbush would be directly affected at one location in the north-central portion of the active park, within an area that supports approximately 110 individuals covering approximately 3,500 square feet. This represents approximately half of the individuals observed on-site; these individuals are located at the far eastern range for this taxon. Decumbent goldenbush is a County List A species and therefore the impacts would be significant (**Impact-BIO-1**).

Approximately 13,857 Palmer's grapplinghook individuals were observed during special-status plant surveys in 2019. Of the 13,857 individuals, 200 would be affected by the construction of the active park, representing approximately 1 percent of the on-site population of this County List D species. Individuals would be removed during grading and site preparation for the project. Because of the relatively low number of individuals affected, as well as the relatively large number of individuals in the entirety of the BSA, impacts would not result in a regional decline in the species and therefore would be less than significant.

Chocolate lily, delicate clarkia, small-flowered microseris, and Southern California black walnut were all observed within the BSA. ~~These~~Furthermore, none of these four species are ~~not~~ within 50 feet of the proposed park footprint and, as such, indirect impacts on these species from construction (i.e., from dust deposition) are expected to be minimal and not result in direct mortality of any of these species. Because these four species would not be directly impa~~ffe~~cted by ~~4.4-24~~construction of the project~~. Because of the widespread nature of Palmer's grapplinghook, as well as the relatively low number of individuals that would be directly removed by the project~~ and indirect impacts would not result in direct mortality, these impacts would be less than significant.

The County redesigned the project's equestrian staging area to avoid impacts on Engelmann oaks. Areas identified as a "Native Habitat Avoidance Area" would not be subject to grading or vegetation removal during site preparation activities (see Figure 4.4-6~~).~~). As a result, no Engelmann oak individuals or their associated canopies would be within the proposed grading limits of the project, and no direct temporary or direct permanent impacts on Engelmann oaks would occur with construction. Grading and site development would occur entirely outside of the canopy dripline of all Engelmann oaks.

The County is proposing grading and site development within 0.94 acre of land within a 50-foot root protection zone[1] where Engelmann oak root zones are located. Activities within the root protection zone would include grading/site preparation (e.g., compaction) and construction of park infrastructure (Figure 4.4-6). These activities would occur within the root protection zone of approximately 25 Engelmann oak trees, including one individual that was noted by the County's arborist in 2020 to be in very poor health and/or dying. Although grading activities would occur within the root protection zone, as mentioned above, none of those activities would occur directly under the canopy of any Engelmann oaks, and no Engelmann oaks would be removed as a result of construction activities associated with the project. However, activities within the root protection zone have the potential to result in indirect impacts and decline in these 25 Engelmann oaks over time. Although indirect impacts during construction would be temporary, it is possible that, within

[1] Root protection zones are defined in Section 3.5.5 of the County's Report Format and Content Requirements document as 50 feet "outward from the outside edge of the oak canopy" (County of San Diego 2010a).

the root protection zone, they could cause damage to the oaks that would not be visible during or even immediately after construction activities occur. This damage could cause a permanent decline in these oaks, resulting in mortality. -In addition, fire fuel modification activities would occur within approximately 0.1 acre of Engelmann oak woodland. Approximately seven Engelmann oak tree canopies are within the area where fire fuel management would occur. Four of these oaks are in the Zone B fire fuel reduction zone where canopy thinning of some oaks may be required, in coordination with a certified arborist. The other three oaks are directly west of South Grade Road, in the 20-foot area where fire fuel management would be extended from the existing fire fuel management area along South Grade Road. Impacts within the root protection zone could potentially be significant, absent mitigation (**Impact-BIO-2)**.

Short-term indirect impacts could occur on decumbent goldenbush, Palmer's grapplinghook, and Engelmann oak during construction activities because each of these sensitive species would occur within 200 feet of the active park. Construction-related indirect impacts could include dust deposition that could alter the photosynthetic vigor of these individual plants and the potential spread of invasive species into the open space ~~preserve~~ from the construction area. These short-term indirect impacts could become permanent if invasive species become established and are not eradicated. Potential erosion of the soil around these special-status plants also could occur from stormwater runoff associated with construction (grading) activities. Dust control measures would be required for this project (see Section 4.3, *Air Quality*), as would stormwater pollution prevention best management practices (BMPs). These would reduce impacts from dust and erosion. As part of the County's long-term management of the ~~preserve~~open space, invasive species and noxious weeds would be ~~managed~~ abated. As a result, these indirect impacts on special-status plants are not expected to result in a long-term decline of any of these species and would be less than significant.

***Special-Status Wildlife Species***

The following special-status wildlife species were observed within the BSA during surveys and are included in the impact analysis for the project (see below): QCB, Belding's orange-throated whiptail, Blainville's (coast) horned lizard, coastal western whiptail, red-diamond rattlesnake, western spadefoot, burrowing owl (wintering migrant), Cooper's hawk, red-shouldered hawk, western bluebird, big free-tailed bat, pallid bat, pocketed free-tailed bat, Townsend's big-eared bat, western long-eared myotis, western mastiff bat, western red bat, western small-footed myotis, western yellow bat, and Yuma myotis. In addition, the following special-status species, which were determined to have moderate or high potential to occur within the BSA, are also included in the impact analysis below: Baja California coachwhip, California glossy snake, coast patch-nosed snake, Coronado skink, Southern California legless lizard, Bell's sage sparrow, burrowing owl (breeding occurrence), ferruginous hawk, grasshopper sparrow, Lawrence's goldfinch, Oregon vesper sparrow, Southern California rufous-crowned sparrow, white-tailed kite, Northwestern San Diego pocket mouse, San Diego black-tailed jackrabbit, and Bryant's (San Diego desert) woodrat.

*Invertebrates*

The project is not within a recovery area or designated critical habitat for QCB (USFWS 2003). The project would result in impacts on two of seven locations (29 percent) where QCB adults were observed in the past on the project site or in Wright's Field, including an observation made in 2010, as documented in the USFWS Carlsbad Fish and Wildlife Office data (2019) and during surveys in 2019 and 2020 (**Impact-BIO-3**). Both locations would be affected by construction of Alpine Park. No locations would be affected by maintenance of the existing trails. Five locations (71 percent) where

QCB adults were observed in the past would be permanently protected within either the Wright's Field Preserve or the proposed open space~~/preserve~~.

Incidental take of QCB could occur in the form of harassment, harm, injury, or mortality during construction. Direct impacts that could result in incidental take of QCB would occur through the permanent removal of 22.4 acres of occupied habitat. Direct impacts on QCB adult locations and host plants (e.g., dot-seed plantain [*Plantago erecta*]) are shown in Figure 4.4-3. Because of the configuration of the proposed park, which would have a straight western extent and an eastern edge defined by South Grade Road, it is not anticipated that QCB would experience additional edge effects compared to baseline conditions. The BSA currently experiences edge effects along South Grade Road, an area where the highest concentration of invasive species was observed and where fuel modification activities are currently conducted within approximately 30 feet of the edge of South Grade Road. After park construction, the edge effects would be moved to the western edge of the park and similar in severity on QCB to baseline conditions.

Indirect impacts on QCB also would occur because of the project. The loss of native forbs that provide QCB with nectar would occur within the 22.4 acres of occupied QCB habitat where the active park would be constructed. The loss of these nectar plants would reduce the carrying capacity of the site to support QCB in perpetuity. During construction, QCB also may avoid habitat along the western edge of the proposed active park because of an increased presence of noise, dust deposition on plants adjacent to the construction areas, and human presence. Indirect effects associated with noise and fugitive dust are not expected to be significant after completion of grading and construction activities.

HCB was not observed within the project site during comprehensive surveys in 2019 and 2020. In addition, HCB has not been documented on the County's property in publicly available databases, such as San Diego Association of Governments (SANDAG) (2011) and CNDDB (2020). Occurrences nearby have been documented at the northern portion of Wright's Field, in an area where spiny redberry is much more abundant than on the County's property, and on a privately held parcel south of Wright's Field. There are approximately 68 spiny redberry within the County's parcel, representing approximately 4 percent of the 1,679 spiny redberry individuals mapped during the HCB surveys on both the County's parcel and Wright's Field. Furthermore, no impacts on spiny redberry would occur from construction of the proposed Alpine Park, activities in the new fire fuel reduction areas, or the associated maintenance of existing trails. As a result, no impacts on HCB individuals are anticipated.

Although development of the active park would result in project activities (i.e., construction of the active park, potential installation of the septic system, and maintenance of the trails) occurring on 20.3 acres of designated critical habitat for HCB, only 4 acres contain the physical and biological features critical to conservation of the species, such as areas with flat-topped buckwheat, including disturbed flat-topped buckwheat. The County's Guidelines for Determining Significance (2010b) considers impacts on occupied HCB habitat to be significant. Because the site is currently unoccupied by HCB, impacts on critical habitat for the species would be less than significant. The USFWS would consider impacts on HCB critical habitat resulting from the project as part of its review of the Habitat Conservation Plan the County is preparing to address impacts on QCB.

*Amphibians*

Western spadefoot may also be affected by the project. One breeding pool of approximately 157 square feet (AP-7) was documented within the active park development footprint. This breeding

pool may be utilized by western spadefoot when seeking to expand from the core population in Wright's Field Preserve during exceptionally wet years, such as 2019 when an egg mass was observed in AP-7. AP-7 ~~will~~would be filled in during construction of the active park (**Impact-BIO-4**). Impacts on this potential breeding pool would be significant absent mitigation.

As described in the Western Spadefoot Survey Report (Appendix D), the core breeding population of western spadefoot is located within seasonally inundated basins in Wright's Field Preserve. A recent study (Baumberger et al. 2019) that documented the distances from breeding pools to burrow locations led to a determination that burrows and estivating adults could be expected to occur within approximately 262 meters of the known breeding pools in Wright's Field Preserve. The area within this 262-meter distance includes the western portion of the BSA but not areas within the proposed active park where grading would occur (see Figure 4.4-4~~).~~). As a result, it is not anticipated that western spadefoot individuals would burrow/estivate within the proposed development footprint for the active park; therefore, it is unlikely that individuals would be crushed or killed during construction activities such as grading.

Adult western spadefoot also emerge a few nights per year to forage and breed (San Diego Management and Monitoring Program 2022). These activities are most likely to occur within the same general area as burrowing habitat, although the presence of eggs within basin AP-7 during 2019 demonstrates that they can migrate farther east and into the area proposed for park development during these nocturnal breeding events but only during particularly wet years. Because these foraging and breeding events happen in the evening when construction equipment would not be active, it is unlikely that direct impacts on western spadefoot, such as crushing or illegal collecting, would occur during foraging and breeding events.

*Reptiles*

Orange-throated whiptail, coast horned lizard, coastal western whiptail, and red-diamond rattlesnake were observed within the BSA. Baja California coachwhip, California glossy snake, coast patch-nosed snake, Coronado skink, and Southern California legless lizard were not observed but could occur within the project site. These nine species would be directly and indirectly affected through implementation of the active park during construction (**Impact-BIO-5**). Direct impacts include the conversion of all native and naturalized habitats within the proposed active park footprint that could support these species. Direct impacts could occur during construction of the active park if individuals are in the construction footprint.

Indirect impacts on these species could occur during construction of the project. Indirect temporary impacts during construction include increased dust from grading and construction, increased noise from construction crews and equipment, and increased foot traffic during construction. However, dust control measures would be required for this project (see Section 4.3) and would reduce these impacts to less-than-significant levels.

*Birds*

Construction of the active park would have permanent direct and indirect impacts on avian species that are endemic to the region, including special-status avian species. A wintering burrowing owl was observed incidentally during surveys in 2019. Cooper's hawk, a California Species of Special Concern; red-shouldered hawk, a County Group I species; and western bluebird, a County Group II species, were observed in the BSA during protocol surveys in 2019 and 2020 and are expected to be affected by the project. Bells' sage sparrow, burrowing owl (breeding occurrence), ferruginous hawk, grasshopper sparrow, Lawrence's goldfinch, Oregon vesper sparrow, Southern California

rufous-crowned sparrow, and white-tailed kite have either moderate or high potential to occur (either breeding or foraging, or both) within the BSA.

Table 4.4-3 summarizes the proposed impacts on habitat for special-status avian species and raptors, grouped by habitat requirements. These impacts are presented in the context of the regionally available habitat for these species groups in the adjacent Wright's Field Preserve and within privately held, directly contiguous open space lands in the immediate vicinity of the ~~proposed~~ project. This analysis shows that the 18 acres of impacts on grassland habitat from the ~~proposed~~ project reflect approximately 14 percent of the available grassland habitat in the immediate habitat block west, north, and south of the project site. By comparison, only 2 percent of the available scrub habitat in the immediate vicinity would be affected by the ~~proposed~~ project. Impacts on habitat for all special-status avian species, most of which are either California Species of Special Concern or Group I species, would be significant, absent mitigation (**Impact-BIO-6**).

**Table 4.4-3. Avian Species Impacts and Availability of Habitat in Immediate Vicinity**

| Avian Species Group | Species Included in Group | Permanent Direct Impacts on Habitat | Available Open Space~~/ Preserve~~ Land | | Percent Impact Compared to All Available Open Space~~/Preserve~~ Land[b] |
|---|---|---|---|---|---|
| | | | Habitat in Alpine Park Preserve (acres) | Habitat in Immediate Vicinity[a] | |
| Generalist Avian Species | Cooper's hawk, red-shouldered hawk, white-tailed kite, raptors | 22.4 | 67.2 | 379.6 | 5% |
| Grassland Obligates/ Open Habitat | Burrowing owl (wintering and breeding), grasshopper sparrow, Oregon vesper sparrow, ferruginous hawk | 18.4 | 15.4 | 113.4 | 14% |
| Scrub Habitat Specialists | Bell's sage sparrow, Southern California rufous-crowned sparrow | 4.0 | 44.7 | 127.8 | 2% |
| Woodland Specialists | Lawrence's goldfinch, western bluebird | 0.1 (No direct removal of Engelmann oaks) | 6.6 | 135.5 | 0.1% |

a. Includes areas within Wright's Field Preserve as well as privately held open spaces, some of which are permanently conserved through conservation easements. Source: SANDAG Conserved Lands GIS data; SANDAG 2012 Vegetation Data for Western San Diego County GIS data.

b. Vegetation data for this analysis included the site-specific vegetation mapping conducted for the ~~proposed~~ project in the BSA and SANDAG 2012 Vegetation Data for Western San Diego County GIS data for all areas outside the BSA. Vegetation data outside of the BSA is not as precise as field-verified vegetation data, but for the general habitat types (grassland, shrubland, etc.) required in this analysis, the SANDAG vegetation data is sufficiently accurate to estimate the relative extent of impacts from the ~~proposed~~ project.

## Legend

- County Parcel
- Western Spadefoot Adult (# of individuals)

**Proposed Project**

- Alpine County Park
- Existing Trails to be Maintained
- Leach Field
- Sewer Pipe
- Native Habitat Avoidance Area
- New Fuel Reduction Area
- Existing Fuel Reduction Area (Not a Part of Project)
- 262 m from Basins WF-6 and WF-7
- Clay Soils

**Seasonally Inundated Basin**

- Filled in 2022
- Basins mapped in 2019 that did not fill in 2022
- Basins Mpped by BCLT

WF-11
WF-10
WF-9
WF-7
WF-6
WF-5
WF-1
WF-12
WF-13
WF-4
WF-3
WF-2
BCLT-1
BCLT-2
BCLT-3
BCLT-4
AP-25
AP-21X
AP-22X
AP-20X
AP-23Xa
AP-23Xb
AP-20
AP-4
AP-3
AP-2
AP-14
AP-21
AP-7
AP-6
AP-1e
AP-1b
AP-22
AP-5
AP-1a
AP-8a
AP-8b
AP-12
AP-1d
AP-10
AP-16
AP-1c
AP-9
AP-13
AP-11
AP-15
AP-17
AP-23
AP-18
AP-19
AP-24

Source: Esri, DigitalGlobe (2018)

0 150 300 Feet
1:2,099

**Figure 4.4-4**
**Western Spadefoot**
**Alpine Park Project**

## Legend

- County Parcel
- Western Spadefoot Adult (# of individuals)

**Proposed Project**

- Alpine County Park
- Existing Trails to be Maintained
- Leach Field
- Sewer Pipe
- Native Habitat Avoidance Area
- New Fuel Reduction Area
- Existing Fuel Reduction Area (Not a Part of Project)
- 262 m from Basins WF-6 and WF-7
- Clay Soils

**Seasonally Inundated Basin**

- Filled in 2022
- Basins mapped in 2019 that did not fill in 2022
- Basins Mpped by BCLT

WF-11, WF-10, WF-9, WF-8, WF-7, WF-6, WF-5, WF-1, WF-2, WF-3, WF-4, WF-12, WF-13

BCLT-1, BCLT-2, BCLT-3, BCLT-4

AP-25, AP-21X, AP-22X, AP-20X, AP-23Xa, AP-23Xb, AP-20, AP-14, AP-21, AP-7, AP-6, AP-4, AP-3, AP-2, AP-1e, AP-1b, AP-1a, AP-1d, AP-1c, AP-22, AP-8a, AP-8b, AP-12, AP-5, AP-10, AP-16, AP-9, AP-13, AP-11, AP-15, AP-17, AP-23, AP-18, AP-19, AP-24

Source: Esri, DigitalGlobe (2018)

0 150 300 Feet

1:2,099

**Figure 4.4-4**
**Western Spadefoot**
**Alpine Park Project**

I:\DCOT\PROJECTS\Alpine_Park_HCP\Figures_ACounty_of_San_Diego\PRIMS_657775\FIG03_Alpine_Park_HCP_FigureDocBinder\pdf\04_4_SpadefootLeach_Fig4_Date_11/1/2022

Direct mortality of nesting avian species, including both common species protected under the MBTA and special-status avian species, also could occur during construction. Direct mortality could occur if eggs, chicks, or adults are crushed or destroyed by construction equipment or if nests are abandoned because of an increase in noise and human presence during construction. This impact (**Impact-BIO-7**) would be significant.

Although the burrowing owl that was observed was a transient winter migrant and breeding season surveys were negative, burrowing owl could still occur within the BSA and possibly within the areas proposed for grading for the active park. Ground squirrel burrows exist throughout the BSA; if breeding burrowing owls are present during construction activities, direct mortality of this species, including eggs or chicks, could occur. Impacts on breeding burrowing owl would be significant absent mitigation (**Impact-BIO-8**).

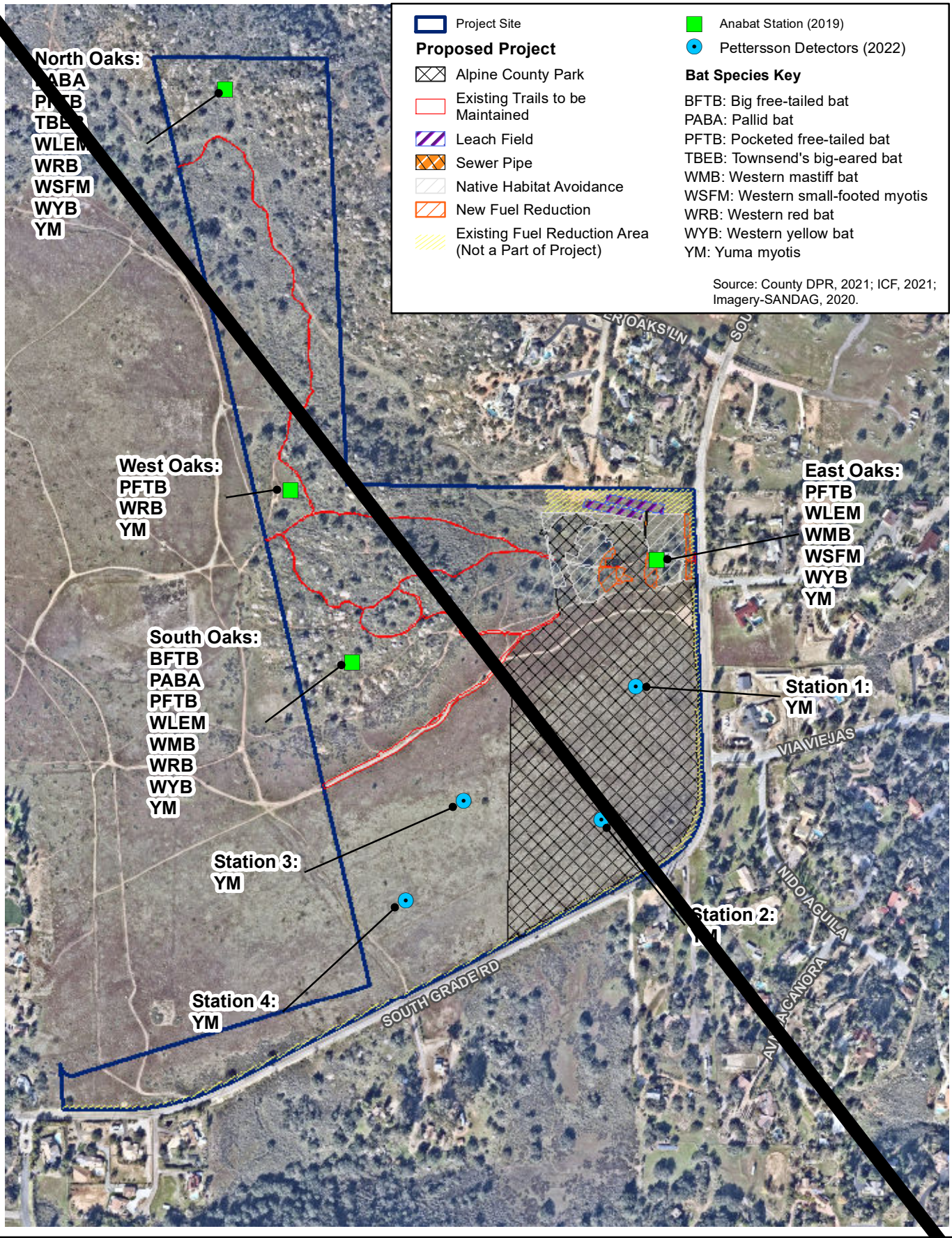
Implementation of the project would also result in the loss of approximately 22.4 acres of functional foraging habitat for raptors. Valley needle grassland and non-native grassland both serve as prime foraging habitat for raptors, as do the open scrub habitats on the site. The project footprint would affect these types of habitats, resulting in a loss of functional foraging habitat for raptors. Impacts on functional foraging habitat for raptors would be significant, absent mitigation (**Impact-BIO-9**).

Temporary direct impacts would occur during construction of the project. Expected impacts include increased dust from grading and construction, increased noise from construction crews and equipment, increased foot traffic during construction, and increased noise from crews and equipment. This may temporarily alter the natural behaviors of avian species in the area. However, dust control measures would be required for this project and would reduce impacts to less-than-significant levels.

*Mammals*

*Special-Status Bats*

Fifteen of the 22 known bat species in San Diego County were detected on the property, 10 of which are considered special-status species. Seven are listed as California Species of Special Concern: pallid bat, Townsend's big-eared bat, western red bat, western yellow bat, western mastiff bat, pocketed free-tailed bat, and big free-tailed bat (Figure 4.4-5~~).~~ ). Three County Group II bat species were also observed in the BSA: western long-eared myotis, western small-footed myotis, and Yuma myotis. Permanent direct and temporary indirect impacts on these species would be expected to occur from construction activities that permanently remove habitat for these species. -These bat species were observed foraging over most of the native habitats in the BSA, especially within the open Engelmann oak woodland, flat-topped buckwheat, and native and non-native grasslands within the project footprint. Direct impacts on up to 22.4 acres of native habitats would remove foraging and possibly roosting habitat for these bat species during vegetation clearing associated with construction of Alpine Park (**Impact-BIO-10**).




\\PDOCITRDSG601\Projects_4\County of San Diego\DPRMSA_557775\TO33_Alpine Park_HCP\Figures\Doc\EIR\Fig04_04_5_SSBats.mxd User: 20236 Date: 11/1/2022

0 250 500 Feet
1 in = 547 ft

**Figure 4.4-7**
**Special-Status Bats**
**Alpine Park Project**

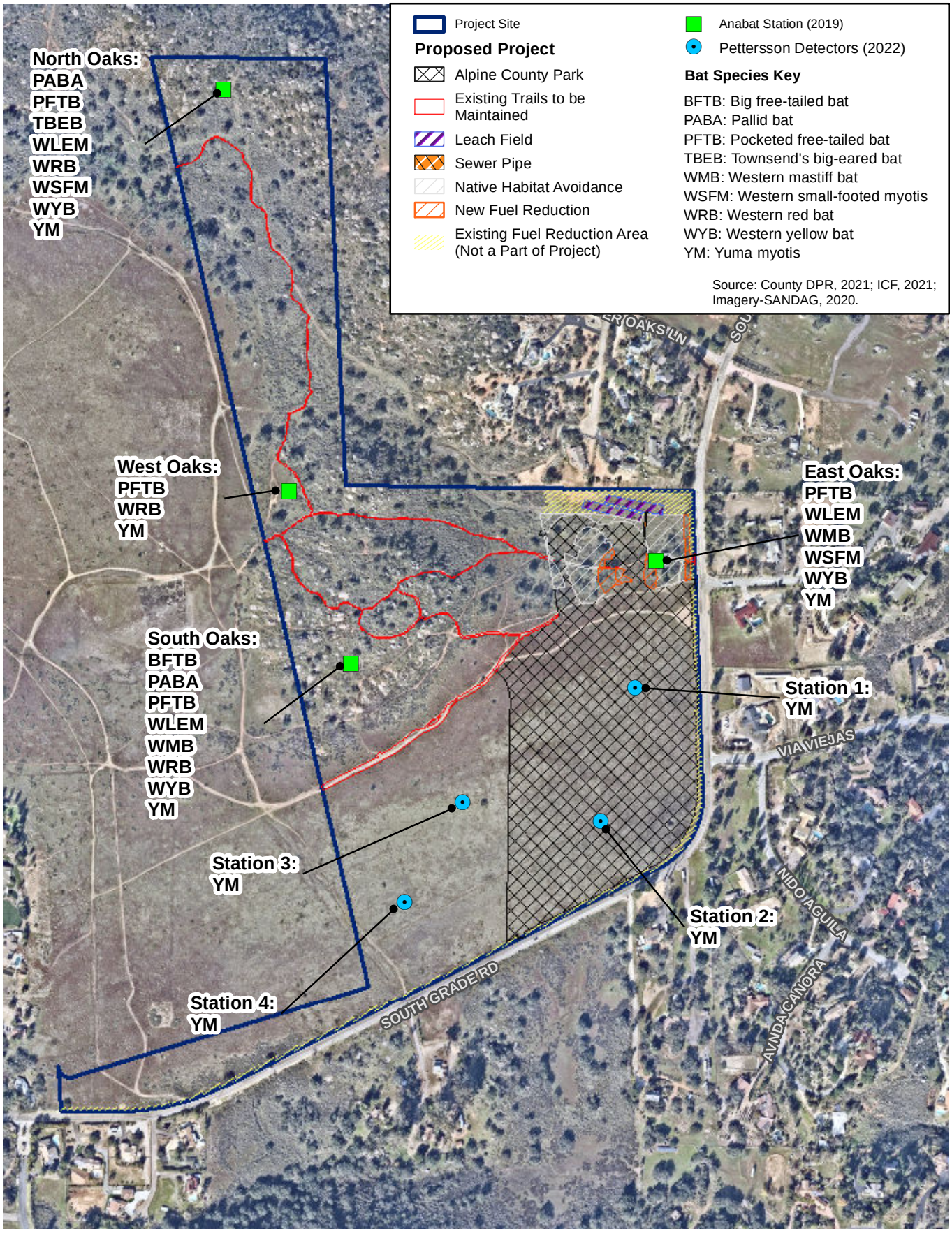



**Figure 4.4-5**
**Special-Status Bats**
**Alpine Park Project**

As mentioned above, impacts on pallid bat foraging habitat would be significant. This species is particularly vulnerable to impacts associated with the ~~proposed~~ project because of the rarity of known roost sites in San Diego County (there are only two known pallid bat colony sites) (Stokes 2018). The individual pallid bats observed during focused bat surveys may belong to a maternal colony that roosts in Viejas at a private residence or in a yet-unknown location. Pallid bat also has a very specific foraging strategy; it utilizes grasslands and open oak woodlands as its main foraging habitat. In addition, this species has characteristics that affect its success with increased urbanization. This includes its tendency to fly at low altitude, its inability to fly for prolonged distances, and its specialized foraging strategies.

Implementation of the project would not affect any known roosting habitat or maternal colony sites; however, roost sites for some of these species are very difficult to detect. There may be some potential for bats, such as pallid bat, to use rock outcrops as roost sites. Pallid bats also may roost in very small crevices within rocks. Rock outcrops that pallid bats may use for roosting were observed west of proposed construction areas, which is close enough for roosting females to potentially experience distress during critical developmental periods, such as when they are pregnant or caring for young. Western red bats may also roost within the foliage of the Engelmann oaks on the site, making them very difficult to detect visually. Bat biologists often require telemetry tracking to positively identify western red bat.

No large rock outcrops or trees would be removed as part of construction of the project. However, construction activities may occur directly adjacent to Engelmann oaks and within approximately 200 feet of rock outcrops. Bat species are particularly vulnerable to impacts on maternal roost sites, such as within oaks or rock crevices. Although direct removal of trees or large boulders is not proposed as part of construction for the active park, high-pitched frequencies (e.g., from surveying equipment) could harm maternal roost sites, resulting in roost abandonment or thermal shock. These impacts could cause direct mortality of pregnant females or pups. The impacts would be significant under the County's guidelines (County of San Diego 2010b), absent mitigation (**Impact-BIO-11**).

Indirect impacts on bat species, such as disruption of foraging behavior, could occur if construction takes place during evening hours. Because bats are nocturnal species and construction is expected to occur during daytime hours, indirect impacts on these species due to construction activities would be minimal and would not be expected to alter natural behaviors. Maintenance of existing trails near or within oak woodlands is not expected to alter the quality of foraging habitat or affect roosting habitat for these species because the trails occur within already-disturbed areas of bare ground.

*Other Special-Status Mammals*

The northwestern San Diego pocket mouse, San Diego black-tailed jackrabbit, and Bryant's (San Diego desert) woodrat were determined to have moderate potential to occur within the BSA and be affected by implementation of the project. Suitable habitat for all three species can be found in the Valley needlegrass grasslands, non-native grasslands, and open flat-topped buckwheat scrub habitats within the BSA as well as the construction footprint of Alpine Park. Grasslands and flat-topped buckwheat within the construction footprint would be directly affected and converted to a developed park, removing it as habitat that could support the species (**Impact-BIO-12**). Temporary direct and indirect impacts on the species are expected to occur during and post-construction of the project. Temporary direct impacts on these species include possible accidental take due to construction activities, increased dust from grading and construction, increased foot traffic during

construction, and increased noise pollution from crews and equipment. Natural behaviors of these species would be affected. However, dust control measures would be required for this project and would reduce these impacts to less-than-significant levels.

Because these species are active mostly at night (Tremor et al. 2017), foraging habits are not expected to be significantly affected, but construction activities may cause them to be active during the day to avoid construction activities. The San Diego pocket mouse is known to utilize burrows for shelter. Because this species is less active during the day, the time when construction would be most active, direct impacts on this species, including the potential for direct mortality through crushing, is possible because San Diego pocket mouse individuals might be resting in burrows.

### Operation

Operation of Alpine Park includes maintenance of the park and existing trail system, fire fuel management activities (i.e., vegetation trimming and clearing), as well as ongoing usage of the park and trails by the public. The equestrian staging area would contain receptacles for waste and equestrian manure; a Manure Management Plan would be prepared for the project to control disease vectors and pests, such as mosquitoes and other animals/insects that are vectors for disease or impacts on human health. The County has proposed additional signage, and a live-~~in~~on volunteer and park rangers to monitor the Alpine Park Preserve and Alpine Park. As such, it is anticipated that fewer long-term impacts on special-status plants and animals would occur after implementation of the ~~proposed~~ project compared to baseline conditions. The sections below provide additional details on this conclusion.

#### *Impacts on Wright's Field*

Operation of Alpine Park and its associated trails has the potential to increase usage on trails within the adjacent Wright's Field Preserve. This increased usage would have the potential to increase impacts on special-status plants and wildlife, consistent with the impacts described below. However, the proposed Alpine Park would be approximately 600 to 800 feet away from the eastern edge of Wright's Field. At that distance, impacts from operation of the active park and formalization of the trails would dissipate considerably and be considered less than significant. Night lighting is intended to be for security and on motion sensors, rather than full time, and would not be used during operation of the park; therefore, impacts on nocturnal animals are not anticipated. Impacts on the Wright's Field trail system from the presence of the active park are not expected to dramatically change the nature or intensity of trail usage at Wright's Field because of both the distance from the park to Wright's Field and the different usage preferences. Users who come to the active park for ball sports or skateboarding are not anticipated to also be hiking the distances required to access Wright's Field regularly. In addition, Wright's Field is accessed from its own entrance on the far western edge of its boundary.

Although some increase in trail usage can be expected from the easier parking within the proposed park, users can currently park along South Grade Road to access trails within the County's parcel and do so regularly. Usage of the trails in Wright's Field is anticipated to be driven by changing conditions in the larger community, including population growth and the availability of other open space areas, even public health hazards such as the coronavirus pandemic, which increased park usage throughout San Diego County. As a result, operation of Alpine Park is not anticipated to result in significant impacts on special-status plants or animals in the adjacent Wright's Field Preserve.

***Special-Status Plant Species***

Trail maintenance is not expected to have direct permanent or temporary impacts on any special-status species or their habitats. Park rangers will ensure that trail maintenance is consistent with the Preserve's Resource Management Plan (RMP) and does not impact populations of rare plants.

Maintenance of the park site would be completed within the perimeter fence that would be constructed around the park; therefore, there would be no effects from park maintenance on special-status plants because none would occur within the active park site once construction is complete.

All special-status species present in the BSA have the potential to be trampled from unauthorized, off-trail users within the proposed Alpine Park Preserve, which could result in plant decline or mortality. Unauthorized off-trail activities observed in the BSA have included off-trail trampling~~,~~ and building of bike jumps/berms. Implementation of the project would include additional signage to educate the public and inform them of avoidance areas, and park rangers and a live-~~in~~on volunteer to monitor the Alpine Park Preserve and Alpine Park. The presence of the active park has the potential to draw additional people onto the trails and open space~~/preserve~~ areas. This potential increase in the number of people using the trails could result in direct impacts on special-status plants if park users go off-trail and sensitive plants are trampled or crushed. Off-trail trampling is a special concern for low-growing annuals such as the two delicate clarkia individuals observed approximately 6 feet from the main east–west trails through the north-central portion of the open space~~/preserve~~, as well as the Palmer's grapplinghook near the east–west trail/vehicle access path through the south-central portion of the open space~~/preserve~~. Within 10 feet of this trail/vehicle access path, fewer than 100 ~~individual~~ Palmer's grapplinghook individuals were noted in 2019. The potential impacts on Palmer's grapplinghook would be less than significant because of the widespread nature of this County List D species (San Diego Natural History Museum 2021). Impacts are not expected on the two delicate clarkia individuals during operation of the trail system because of the County's proposed management of the Alpine Park Preserve, within which these individuals will be located. Signage and fencing will be implemented in specific locations, in accordance with the RMP. Furthermore, it is unlikely that additional trail use would affect the Engelmann oaks and Southern California black walnut because of their size. Similarly, increased traffic on trails is not likely to jeopardize the long-term existence of the San Diego County viguiera because of the location of these individuals far north of the open space~~/preserve~~, an area that is not heavily traveled, as well as the widespread nature of this taxa (San Diego Natural History Museum 2021~~).~~.). With implementation of management of the Alpine Park Preserve, the potential for impacts on special status plants from the operation of the Project would be less than significant.

Other potential long-term impacts resulting from operation of the active park and formalization of the existing trail system include an increase in invasive plant propagules being introduced into the open space~~/preserve~~. This, combined with the existing bare ground that exists along these trails, could create an environment that could support invasive species, creating more competition with the special-status species. Invasive plant management along the edges of the trails will be a management focus for the County during the long-term resource management associated with the open space~~/preserve~~. As a result, these activities would not present a significant impact on the regional long-term survival of special-status plants present on the site.

Impacts to Engelmann oaks could potentially occur during fire fuel reduction activities, as described above, but would occur in coordination with a certified arborist. No other special-status plants or host plants for QCB or HCB occur within these new fire fuel management zones.

***Special-Status Wildlife Species***

As mentioned above, operation of the active park includes maintenance of the park and existing trail system as well as the ongoing usage of the park and trails by the public. Maintenance of the trails and the park site would result in occasional noise and additional human presence along the trail and at the edge of the park adjacent to the open space~~/preserve~~. This noise could disrupt behavioral patterns of special-status wildlife adjacent to these activities, with varying degrees of intensity, based on the distance of the animal from the noise source and its ability to withstand noise and other anthropogenic disturbances. Noise impacts from maintenance activities would not result in direct mortality of individual special-status wildlife species and would not result in a regional decline of these species. As such, these impacts would be less than significant. Furthermore, proper maintenance of the park, such as trash collection and disposal, would reduce impacts on special-status wildlife species in the open space~~/preserve~~ by ensuring that litter would not blow into the open space~~/preserve~~ and entice wildlife to ingest trash. This would also help control animal pest infestations that could disrupt special-status wildlife use of the proposed Alpine Park Preserve.

The following sections describe the potential impacts on special-status wildlife species from additional human usage of the trails and open space~~/preserve~~ areas. Much of the discussion that follows reflects the latest research on the subject of "recreational ecology," which is an interdisciplinary field that studies the ecological impacts of recreational activities and the management of these impacts (CDFW 2020).

*Invertebrates*

Post-construction, the existence of Alpine Park would increase the amount of anthropogenic influence in the areas along the existing trails. The existing trails currently support a few scattered dot-seed plantain individuals that may be trampled with increased use of the trails. These impacts are also included in total impacts on QCB host plants, described under *Construction*, above. Other indirect impacts may be similar to those described for the federally endangered Karner blue butterfly (*Lycaeides melissa samuelis*) (CDFW 2020). In that study, the Karner blue butterfly flushed in the presence of hikers, similar to how they might respond to natural predators. Recreational activities also restricted the choice of and access to host plants due to the presence of hikers, rendering the quality of the habitat within 33 feet of the trail unsuitable.

Within the 96.6-acre project site, approximately 3,450 host plants are located within 33 feet of existing trails that would be formalized as part of the project. QCB may be restricted from accessing these host plants, reducing the potential reproductive success of individuals. These indirect impacts from increased human presence along trails may cumulatively result in reduced use by QCB of habitat immediately surrounding the trails. QCB has persisted at the project site over time and is presumed to currently utilize areas adjacent to trails, especially in areas where host plants are located. The increase in human activity from formalization of the trails and creation of the Alpine Park is not expected to result in regional long-term decline of this species or additional direct take of individuals. The large stand of dot-seed plantain in the northern portion of the project site (see Figure 4.4-3) is directly adjacent to and surrounded to the east by closed-canopy scrub habitat that was determined during protocol-level surveys to not be suitable for QCB, in accordance with the definition of "excluded areas" in the 2014 USFWS survey guidelines. In the southern portion of the project area, dot-seed plantain was mapped within approximately 20 to 30 feet of the existing dirt road that leads to the Wright's Field property. This road is being maintained for access to Wright's Field; it is not anticipated that this road will see a major increase in either pedestrian or vehicular traffic from the ~~proposed~~ project. The other alternative for accessing Wright's Field would be from

the south, directly off South Grade Road. This access road is much more overgrown and supports a significantly larger population of dot-seed plantain. This is where ICF directly observed QCB in 2020. As a result, the proposed access road to Wright's Field through the central portion of the County's parcel reflects the least impactful option for permanent access to the Wright's Field Preserve with respect to QCB. In addition, County DPR would restrict access to approximately 3,300 feet of existing trails throughout the open space~~/preserve~~, allowing those areas to naturally revegetate and stabilize. Dot-seed plantain has been documented on the project site colonizing old roads and trails; it appears to have a competitive advantage over annual grasses in these compacted soils. Annual grasses can outcompete dot-seed plantain in other areas; therefore, it is probable that the closed trails may support host plants in the future. As a result, it is not anticipated that operational effects of the project would result in additional significant impacts on QCB, beyond those described for construction, above.

*Reptiles and Amphibians*

Post-construction, the existence of Alpine Park would increase the amount of anthropogenic influence in the areas immediately surrounding the park footprint. There is a possibility for increased foot traffic, mountain bike traffic, and horse traffic within the trail system that is proposed to be formalized as part of the project. These trails exist in habitat that could support special-status reptiles and amphibian species, such as the Belding's orange-throated whiptail, coast horned lizard, coastal western whiptail, and red-diamond rattlesnake, which were observed within the BSA, and other special-status reptile species that could occur within the BSA. With an increase in these activities, there is an increased risk of these species being crushed, especially from mountain bike activities. Bike-caused fatalities may occur because amphibians and reptiles may be attracted to trails for thermoregulation and thereby become vulnerable to collisions with bikes (CDFW 2020). An increased presence of humans also means an increased presence of domestic dogs, which may predate on these species. Dogs' scent can linger as well, long after a dog has left an area, which can repel special-status wildlife species (CDFW 2020). This is true for both leashed and unleashed dogs.

As mentioned above, the County has proposed additional signage and a live-~~in~~on volunteer and park rangers to monitor the Alpine Park Preserve and Alpine Park as part of project implementation. Moreover, the public is currently accessing the County property for hiking and mountain biking, in some instances along trails that would be closed as part of the project. The presence of an active park adjacent to these trails is not anticipated to significantly increase mortality or reduce the viability of special-status reptiles or amphibians over the long-term because of the differences in user preferences between the two forms of recreation. There most likely would be an increase in the number of horses on the property compared to baseline condition due to the construction of an equestrian staging area. Horses move much slower than most reptile species, and as such, most reptiles would be adroit enough to avoid being crushed by hooves. However, these impacts would be significant absent mitigation because they could directly and permanently affect Group I wildlife species and/or California Species of Special Concern (**Impact-BIO-13**).

*Western Spadefoot*

During development of the proposed trails, the County worked closely with the Back Country Land Trust (BCLT) to determine which trails to close and which to keep open to the public. One of the factors in these decisions was the presence of known population of western spadefoot within seasonally inundated basins along roads/trails in the eastern portion of Wright's Field Preserve. An existing trail, currently located along a steep section of the "knoll" or central hill on the County's

parcel, leads visitors directly into the area where western spadefoot is known to breed on Wright's Field. BCLT has noted erosion issues in the past along this segment of trail and recommended the County close it to minimize further erosion issues. To accommodate this request, the County is proposing to close that trail as part of the project. One trail segment that would remain open leads visitors into Wright's Field Preserve just north of the area where western spadefoots are known to breed. This trail is less steep, and erosion is not a concern in this segment.

Spadefoots forage only during brief periods; therefore, it is unlikely that trail users and/or their pets would pose a risk to western spadefoots from being crushed, predated, or killed. For most of the year, western spadefoots are underground in protected burrows; when foraging, they typically do so at night. Moreover, it is not anticipated that the presence of the active park or formalization of existing trails would dramatically increase the number of users on the trails such that the small number of western spadefoots that may be foraging during the day at peak breeding times would face a significantly higher risk from direct crushing or predation. These risks are currently present and will continue to be present but pose a very minimal risk to western spadefoots. As a result, operational impacts on western spadefoot would be less than significant.

*Birds*

Similar to QCB, discussed above, special-status avian species may be affected by increases in the number of hikers using the trail system because they may be flushed from their resting or nesting locations more often with increased foot traffic. Increased rates of flushing in avian species has the potential to negatively impact thermoregulation abilities, nesting success, and ability to forage for food successfully. Thresholds vary for how many users can be in an area before birds are negatively affected, but it is generally accepted that more visitors will cause more wildlife effects (CDFW 2020). Dog-specific disturbance (e.g., lingering dog scent, predation) has been studied for birds, with no evidence that birds become habituated to dog presence, even with leashed dogs and even where dog walking was frequent (CDFW 2020).

There is also the possibility that increased car traffic within the park footprint may result in additional collisions with avian species flying over the park. These impacts may cumulatively result in reduced numbers of special-status avian species as well as a decrease in use of habitat immediately surrounding the project footprint. These impacts would be significant absent mitigation because they could directly and permanently affect Group I wildlife species and/or California Species of Special Concern (**Impact-BIO-13**).

Impacts on nesting birds also may occur during fire fuel management activities proposed for the project. Activities such as vegetation removal or tree limbing could cause direct mortality to special-status and common avian species protected under the MBTA. These impacts would be significant, in accordance with **Impact-BIO-7**, described above. As recommended in the FEOA, nesting bird surveys must be conducted prior to these activities if they are conducted during the nesting season.

*Mammals*

*Special-Status Bats*

Operation of the project is not expected to have significant temporary or permanent impacts on special-status bat species. Because bats are nocturnal and the park hours would be from sunrise to sunset, with no night lighting allowed, anthropogenic activity is not expected to have an impact on bat behavior.

*Other Special-Status Mammals*

The northwestern San Diego pocket mouse, San Diego black-tailed jackrabbit, and Bryant's (San Diego desert) woodrat were determined to have moderate potential to occur within the BSA. These species could experience impacts similar to those described for reptiles, above, during operation of the project. These include collisions with mountain bikes, predation by dogs, and avoidance of habitat areas due to lingering dog scent. Humans may ~~can~~ reduce habitat suitability and the carrying capacity of habitat areas for mammals due to these actions. These impacts may cumulatively result in reduced numbers of special-status mammal species as well as a decrease in use of habitat immediately surrounding the project footprint.

As mentioned above, the County has proposed additional signage and a live-~~in~~on volunteer and park rangers to monitor the Alpine Park Preserve and Alpine Park as part of project implementation. Moreover, the public is currently accessing the County property for hiking and mountain biking, in some instances along trails that would be closed as part of the project. The presence of an active park adjacent to these trails is not anticipated to significantly increase mortality or reduce the viability of special-status mammals over the long-term because of the differences in user preferences between the two forms of recreation. There likely would be an increase in the number of horses on the property compared to baseline condition due to the construction of an equestrian staging area. However, horses move much slower than most mammal species, and as such, most mammals, including the three discussed in this section, would be skilled at avoiding hooves. However, these impacts would be significant absent mitigation because they could directly and permanently affect Group I wildlife species and/or California Species of Special Concern (**Impact-BIO-13**).

## Impact Determination

Implementation of the project would have a substantial adverse effect, either directly or through habitat modifications, on species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations or by CDFW and USFWS. Potentially significant and significant impact(s) include the following:

**Impact-BIO-1: Significant Impacts on Decumbent Goldenbush.** Of the 226 decumbent goldenbush individuals observed within the survey area, 110 would be affected by the project, which is nearly half of the on-site population. These impacts would be significant on the existing population of decumbent goldenbush, absent mitigation.

**Impact-BIO-2: Potentially Significant Impacts on Engelmann Oaks.** No direct impacts on any Engelmann oaks would occur because of implementation of the project. Indirect impacts may include potential grading within the root protection zone. Approximately 0.94 acre is within the root protection zone where grading/site preparation (e.g., compaction) and construction of park infrastructure would occur (Figure 4.4-6). Impacts would occur within the root protection zone, but not within the canopy/dripline, of approximately 25 Engelmann oak trees, including one individual that appears to be dying. These oaks are at risk of injury or mortality if construction activities damaged the root zones or aboveground portions of the trees. Canopy thinning may be conducted under the supervision of a certified arborist, as part of fire fuel management in these areas. Engelmann oaks have endured challenges in recent years that threaten the long-term survival of the species; these challenges include development, pest infestations, and climate change impacts. As a result, impacts within the root protection zone and impacts associated with fire fuel management activities could potentially be significant, absent mitigation.

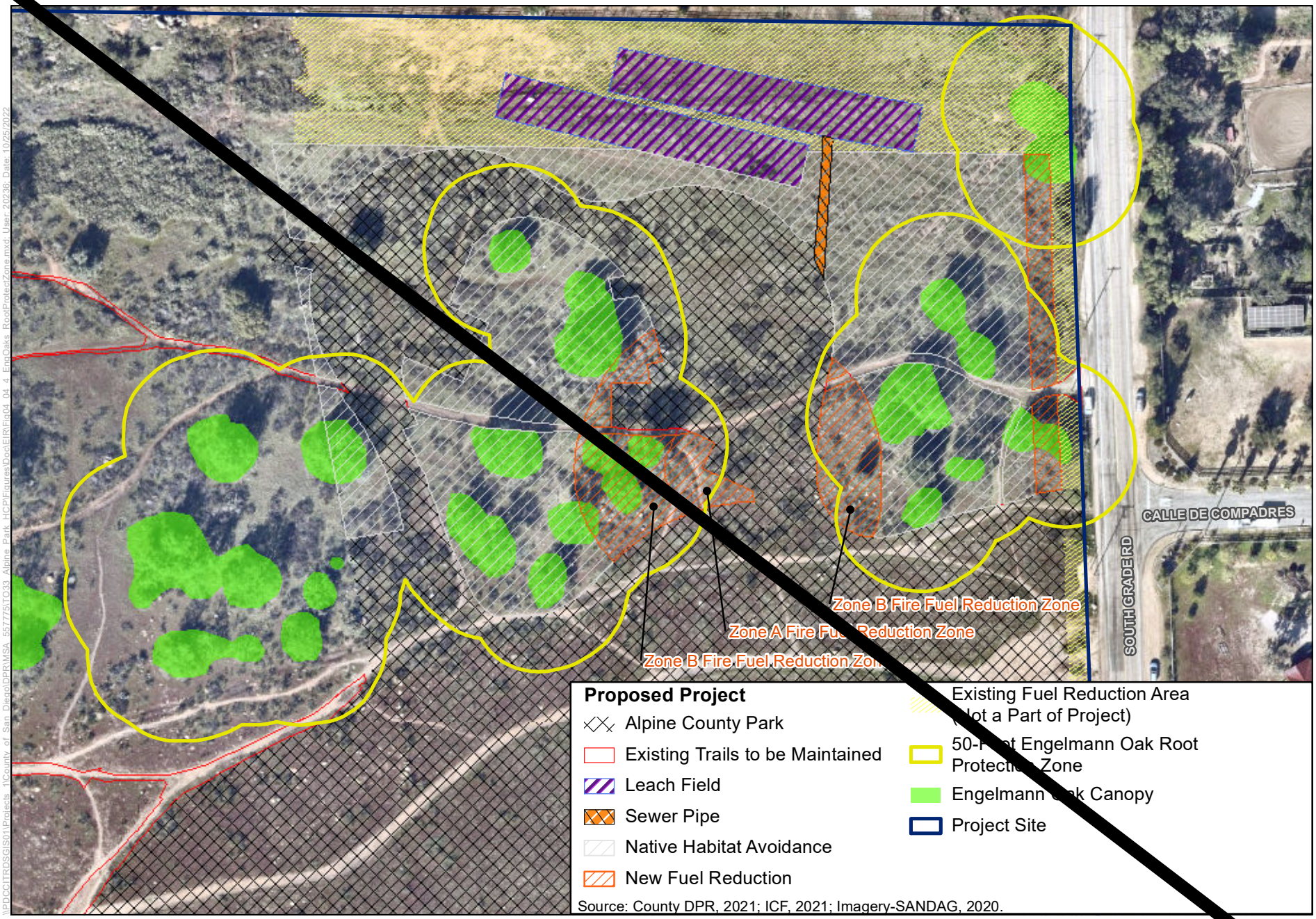



**Figure 4.4-6**
**Engelmann Oak Root Protection Zone Impacts**
**Alpine County Park Project**

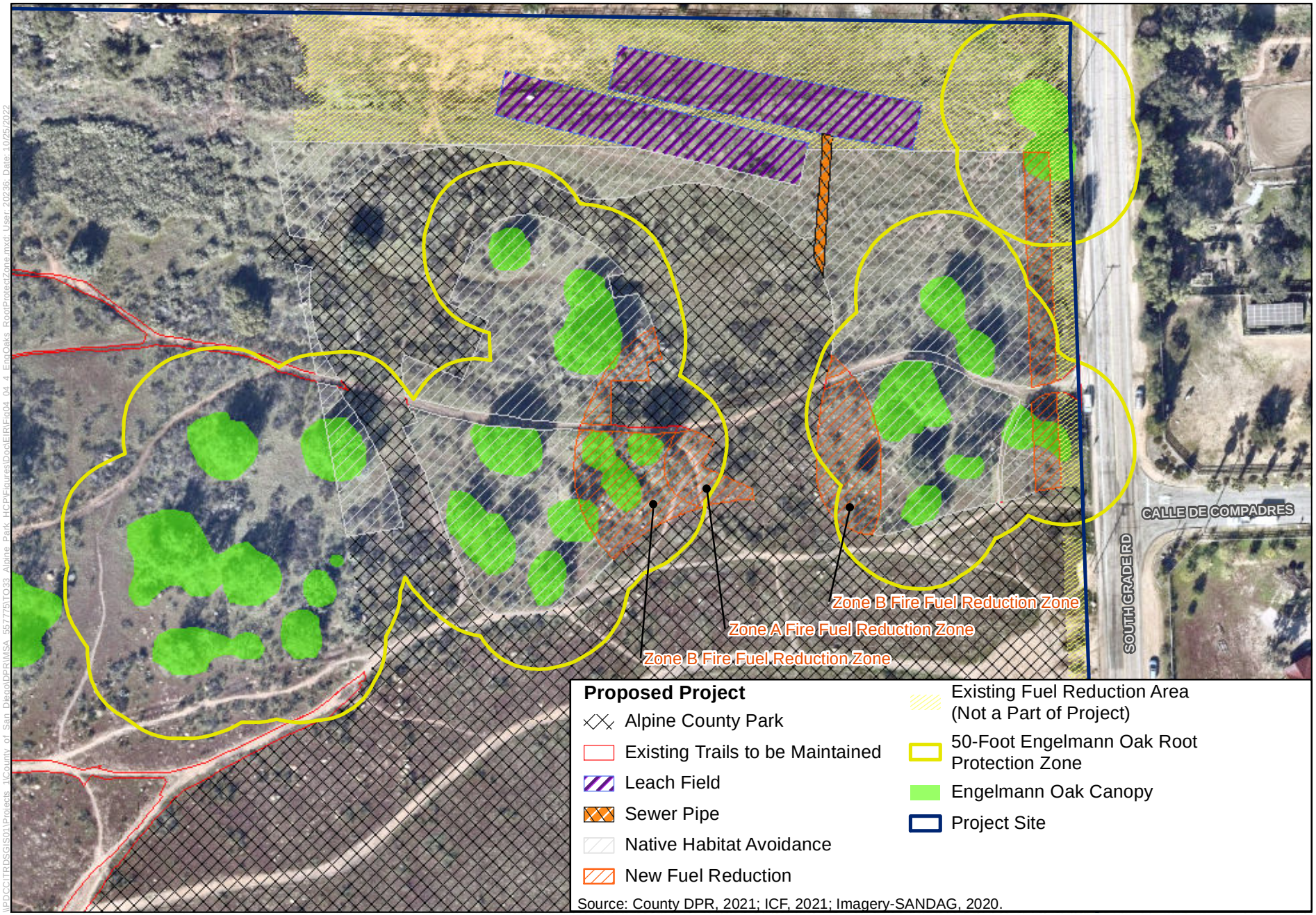



**Figure 4.4-6**
**Engelmann Oak Root Protection Zone Impacts**
**Alpine County Park Project**

**Impact-BIO-3: Significant Impacts on QCB Occupied Habitat During Construction.** Occupied QCB habitat would be affected by construction and maintenance of the project. Impacts on occupied QCB habitat would be significant.

**Impact-BIO-4: Significant Impacts on Western Spadefoot.** One seasonally inundated basin (AP-7) within which western spadefoot eggs were observed in 2019 would be filled in during construction of the active park. This impact could limit the ability of western spadefoot within the core breeding habitat on Wright's Field to expand territory during wet years. This could cause declines in the core population over time because it would restrict locations where breeding activities could occur and reduce breeding refugia sites. These impacts could potentially be significant, absent mitigation.

**Impact-BIO-5**: **Habitat Impacts on Special-Status Reptiles.** Impacts on eight special-status reptile species (California glossy snake, coast patch-nosed snake, coast horned lizard, coastal western whiptail, Coronado skink, orange-throated whiptail, red-diamond rattlesnake, and Southern California legless lizard) could potentially be significant, absent mitigation. Coast horned lizard and orange-throated whiptail are MSCP covered species that are considered adequately conserved with implementation of the South County MSCP. The larger ~~preserve~~open space being assembled with implementation of the South County M~~C~~SCP affords the remaining six species (not covered under the MSCP) additional regional conservation benefits because these species are generalists and can utilize a wide variety of habitats that are permanently protected under the MSCP. ~~As a result, impacts on these species would be less than significant.~~

**Impact-BIO-6: Habitat Impacts on Special-Status Avian Species.** Impacts on 22.4 acres of foraging and/or breeding habitat for special-status avian species could potentially be significant, absent mitigation. Southern California rufous-crowned sparrow and ferruginous hawk are MSCP covered species that are considered adequately conserved with implementation of the South County MSCP. The larger ~~preserve~~open space being assembled with implementation of the South County M~~C~~SCP affords some of these generalist species (e.g., Cooper's hawk, red-shouldered hawk, white-tailed kite) additional conservation benefits at a regional level because these species are generalists and can utilize a wide variety of habitats that are permanently protected under the MSCP. ~~As a result, impacts on avian special-status species and raptors would remain less than significant.~~

**Impact-BIO-7**: **Impacts on MBTA-Protected Avian Species During Breeding Season**. Impacts on the nesting success of any bird protected by the MBTA, such as removal of an active nest during construction or the loss of eggs or chicks from construction noise or human presence, would be significant.

**Impact-BIO-8: Potential Impacts on Breeding Burrowing Owl.** Although not documented as breeding on-site, burrowing owl could begin breeding within areas proposed for construction in the future. Potential impacts on breeding burrowing owl during construction would be significant.

**Impact-BIO-9: Impacts on Raptor Foraging Habitat.** Impacts on 22.4 acres of prime foraging habitat for raptors would be significant.

**Impact-BIO-10: Habitat Impacts on Special-Status Bats.** Impacts on up to 22.4 acres of habitat for special-status bats would be significant absent mitigation due to the small home ranges and specialized foraging habits for some of these species, lack of coverage for these species in the MSCP, and the California Species of Special Concern and/or Group I status for most of these species, indicating their relative rarity in the County.

**Impact-BIO-11: Potential Impacts on Maternal Bat Roost Sites.** Impacts on any bat species roost sites, such as rock crevices or oak trees, could result in direct mortality of adults and possibly juvenile bats. Even if direct impacts on these sites do not occur, roosting females may be negatively affected by increased noise and disturbance within proximity of their roost sites, which could result in increased mortality of young or similar reduction in fecundity. Furthermore, roosting bats may be very difficult to detect; therefore, it would be hard to know if impacts on roost sites were occurring, absent detailed studies using mist nesting, tracking, and telemetry. Direct or indirect impacts on roost sites causing mortality or reproductive decline in special-status bats would be significant, absent mitigation.

**Impact-BIO-12: Impact on Other Special-Status Mammals During Construction.** Impacts on special-status mammal species would be significant, absent mitigation. The larger ~~preserve~~open space being assembled with implementation of the South County M~~C~~SCP affords these species some conservation benefits at a regional level because these species are generalists and can utilize a wide variety of habitats that are permanently protected under the MSCP. However, these species are not covered under the MSCP, and as such, impacts on these species would be significant, absent mitigation.

**Impact-BIO-13: Impacts on Group I Wildlife Species/California Species of Special Concern During Operation.** Operation of the ~~proposed~~ project may result in reduced numbers of special-status species due to an increase in mortality rates as well as a decrease in use of habitat immediately surrounding the project footprint. These impacts on Group I Wildlife Species/California Species of Special Concern could potentially be significant, absent mitigation.

## Mitigation Measures

~~The~~ County DPR proposes the following mitigation measures to reduce potentially significant impacts to below a level of significance.

For **Impact-BIO-1**: **Significant Impacts on Decumbent Goldenbush**

**MM-BIO-1: Replace Decumbent Goldenbush.** To mitigate for significant impacts on decumbent goldenbush, ~~the~~ County DPR shall replace at a 3:1 mitigation ratio any affected decumbent goldenbush individuals. Individual plants and/or seeds will be salvaged from the onsite population prior to the start of construction and installed within the open space~~/preserve~~. Plantings shall be monitored for a minimum of 3 years to ensure the 3:1 mitigation ratio has been met and that the planted individuals have properly established themselves. Seed/material from onsite populations may be contract grown to provide replacement plantings.

For **Impact-BIO-2**: **Potentially Significant Impacts on Engelmann Oaks**

**MM-BIO-2: Implement Engelmann Oak Avoidance and Minimization Measures.** The following measures will minimize and avoid potential impacts on Engelmann oaks resulting from the Project:

1. Engelmann oaks within 50 feet of any mass grading shall be fenced entirely around the tree dripline to ensure that no construction activities, including equipment staging, vegetation grubbing, driving, or grading, occur within the tree's dripline. These restrictions shall be communicated to the construction contractor prior to work in this area.

2. To mitigate for any potential significant impacts to Engelmann oak trees, the County will monitor the health of all Engelmann oaks within 200 feet of the proposed Alpine County Park development footprint for 5 years following construction. A certified arborist with experience monitoring oak health will conduct the monitoring. Mortality or serious declines in the health of the Engelmann oaks during these 5 years within this area will be mitigated at a 3:1 ratio, should significant impacts occur. Specifically, three Engelmann oaks will be planted for each oak tree that has died or is in serious decline. The mitigation would occur within on-site Engelmann oak woodland areas that will be permanently protected. Planting shall occur within either the Native Habitat Protection Area or within the northwestern portion of the open space ~~preserve~~. All oak plantings must be certified pathogen free, including for *Phytophthora* species.
3. Any areas within the Engelmann oak root protection zone (i.e., all areas within 50 feet of Engelmann oak canopy) shall be identified on a map that is provided to the construction contractor. Any grading or construction activities within the root protection zone shall be monitored to minimize impacts on oaks to the maximum extent possible. Training shall be provided for the construction contractor by a biological monitor prior to the start of construction activities in this area. This training will detail ways that the construction contractor can reduce impacts as much as possible on Engelmann oaks within the root protection zone. The following avoidance and minimization measures must be implemented: (1) minimizing repetitive travel routes within the root protection zone, (2) restricting any long-term storage of heavy materials within the root protection zone, and (3) restricting work within the root protection zone when the ground is wet to avoid compaction as much as possible after a rain event. Additional avoidance and minimization measures not envisioned here that can be feasibly implemented during construction must be identified and implemented.

For **Impact-BIO-3: Significant Impacts on QCB-Occupied Habitat During Construction**

**MM-BIO-3: Ensure No Net Loss of Quino Host Plants and Provide Permanent Protection of Quino Habitat~~.. The.~~** County DPR shall seek a Section 10 Incidental Take Permit (ITP) for impacts on QCB-occupied habitat and comply with any additional mitigation required by the ITP. Regardless of the conservation measures required under the ITP, the County will mitigate for impacts on occupied QCB habitat by providing, at a minimum, on-site preservation of occupied habitat for QCB within the open space~~/preserve~~ and ensure that no net loss of QCB host plants will occur because of the project. ~~The~~ County DPR shall ensure that there is no net loss of QCB host plants by performing on-site enhancement and restoration activities within QCB habitat, including planting dot-seed plantain, removing thatch to support healthy populations of dot-seed plantain, and maintaining and monitoring these enhancement areas for a minimum of 5 years. Construction activities shall not occur until the ITP is secured. Conservation measures shall be implemented pursuant to that ITP and will include measures to restore and enhance QCB habitat and provide permanent habitat protection and maintenance activities within the open space~~/preserve~~.

As part of its ongoing monitoring, the County will demonstrate that QCB persists on the project site at the end of the 5-year restoration and enhancement period. If QCB can no longer be found on either the County's ~~preserve~~open space or within the adjacent Wright's Field in a normal flight-year at the end of the 5-year restoration period, the County will secure a specific off-site parcel that will contribute meaningfully to the species' long-term conservation.

For **Impact-BIO-4**: **Significant Impacts on Western Spadefoot**

**MM-BIO-~~-~~4: Western Spadefoot.** The County will mitigate for impacts on one western spadefoot breeding pool, approximately 157 square feet in size, by creating three permanent basins, encompassing a minimum of 471 square feet, to support western spadefoot breeding. These constructed basins will be created within clay soils on the permanently protected lands on the County's parcel, no closer than 100 feet from the western edge of Alpine Park. Basins will be constructed within approximately 262 meters of the core breeding population on Wright's Field to maximize opportunities for western spadefoots on Wright's Field to naturally expand into these newly constructed basins. No basins will be constructed within the areas proposed for QCB habitat enhancement activities.

Hydrological analysis will be conducted prior to site selection to map the micro-watersheds in potential sites and ensure the constructed basins fill naturally with rainwater. Basins will be constructed to allow for maximum inundated depths of approximately 18 to 24 inches (20 to 60 centimeters), with the goal that they remain inundated long enough to increase the chances for breeding to be successful during dry years. Conversely, the newly constructed basins shall be designed in such a way that they support standing water for only several weeks following seasonal rains and aquatic predators (e.g., fish, bullfrogs, crayfish) cannot become established. Because ponding duration is so critical to the success of this effort, additional studies may be needed to estimate infiltration rates, soil profile, depth of clay soil layer, etc. The County will conduct these studies, as needed, to estimate the ponding duration within constructed basins. Terrestrial habitat surrounding the proposed relocation site shall be as similar in type, aspect, and density to the location of the existing pool(s), as feasible.

The County will develop a Western Spadefoot Habitat Mitigation and Monitoring Plan to describe requirements for the constructed basins, how basin sites are chosen, what activities will be conducted during the installation of the new basins, adaptive management, maintenance activities, access controls (e.g., fences), and what monitoring and reporting activities will occur and when. The data for the micro-habitat hydrological analysis will also be presented within this plan. The Western Spadefoot Habitat Mitigation and Monitoring Plan will be provided to the CDFW and USFWS for review and comment.

The new basins will be constructed concurrently with Alpine Park, and western spadefoots observed within the project footprint will be relocated to suitable basins outside the project footprint.

Monitoring of the newly constructed basins will be conducted during the wet season (approximately December through April) at approximately weekly intervals, beginning with the first significant rain event each year for 5 years following completion of basin construction. The County's biologist will map the spatial extent of the basins, document the inundation depths of the basins and breeding outcomes, and determine if adaptive management is needed to increase survival and recruitment within the constructed basins. Notes will be made if egg masses or larvae are observed. One nocturnal adult survey will also be conducted in each of the 5 years when a breeding event is occurring in order to document the foraging/mobility patterns of western spadefoots in the area of the new basins. The County will also monitor the core breeding population on the Wright's Field Preserve, using the same methods described above (i.e., basin mapping, weekly checks, nocturnal survey) to document the population dynamics of the entire population over time.

Monitoring/survey data will be provided to CDFW and USFWS by the monitoring biologist following each monitoring period; a written report summarizing the monitoring results will be

provided to CDFW and USFWS at the end of the monitoring effort each year. Success criteria for the monitoring program shall include evidence of a ponding duration that is suitable for western spadefoot reproduction within at least one of the constructed basins during at least one of the 5 years of monitoring.

After exclusionary fencing has been installed around all initial proposed ground-disturbing construction, but prior to initiation of initial ground disturbance, the spadefoot biologist will conduct at least three nighttime surveys for spadefoots within the fenced area. Surveys will continue until no more spadefoots are captured and relocated out of the fenced footprint and/or upon the recommendations of the spadefoot biologist. These surveys will be conducted during appropriate climatic conditions and during the appropriate hours (i.e., nighttime, during rain events in breeding season) to maximize the likelihood of encountering spadefoots. If climatic conditions are not highly suitable for spadefoot activity, spadefoot habitat in the project footprint will be watered to encourage aestivating toads to surface. All spadefoots found within the project area will be captured and translocated by the spadefoot biologist to the nearest suitable habitat outside of the work area. Upon completion of these surveys and prior to initiation of construction activities, the spadefoot biologist will report the capture and release locations of all spadefoots found and relocated during these surveys to CDFW and USFWS.

For **Impact-BIO-5**: **Habitat Impacts on Special-Status Reptiles**

**APM-BIO-1: Establishment of the Open Space Preserve** and **MM-BIO-9: Provide Compensatory Habitat-Based Mitigation** (see Threshold 2, below). Habitat-based mitigation will be provided consistent with **MM-BIO-9**, below, for significant impacts on special-status reptiles.

For **Impact-BIO-6: Habitat Impacts on Special-Status Avian Species**

**APM-BIO-1: Establishment of the Open Space Preserve** and **MM-BIO-9: Provide Compensatory Habitat-Based Mitigation** (see Threshold 2, below). Habitat-based mitigation will be provided consistent with **MM-BIO-9**, below, for significant impacts on special-status avian species.

For **Impact-BIO-7**: **Impacts on MBTA-Protected Avian Species During Breeding Season**

**MM-BIO-5: Avoid and Minimize Impacts on Special-Status Avian Species and Other Birds Protected under the MBTA.** To mitigate for potentially significant impacts on sensitive nesting birds and raptors, ~~the~~ County DPR shall avoid ground-disturbing activities during the bird breeding season to keep the project in compliance with ~~s~~State and federal regulations regarding nesting birds (i.e., the federal MBTA and California FGC). The bird breeding season is defined as January 15 to September 15, which includes the tree-nesting raptor breeding season of January 15 to July 15, the ground-nesting raptor breeding season of February 1 to July 15, and the general avian breeding season of February 1 to September 15.

If removal cannot be avoided during the bird and/or raptor nesting season, a nesting bird survey shall be conducted no more than 72 hours prior to ground-disturbing activities by a qualified avian biologist within 500 feet of proposed ground- or vegetation-disturbing activities. Biologists will also survey for raptor nests up to 1,500 feet from proposed ground- or vegetation-disturbing activities. This is necessary to definitively ascertain whether raptors or other migratory birds are actively nesting on the project site or in a vicinity that could be indirectly affected by work activities (i.e., through noise or visual disturbances). Special

attention will be paid to determining the presence of nesting grassland-endemic bird species, such as grasshopper sparrow, that may be nesting within the dense grasses present within the proposed development footprint.

If any active nests are detected, the area shall be flagged and mapped on construction plans, along with a buffer, as recommended by the qualified biologist. The buffer area(s) established by the qualified biologist shall be avoided until the nesting cycle is complete or it is determined that the nest is no longer active. The qualified biologist shall be a person familiar with bird breeding behavior and capable of identifying the bird species of San Diego County by sight and sound. The biologist shall determine if alterations to behavior have occurred as a result of human interaction. Buffers may be adjusted, based on observations by the biological monitor of the response of nesting birds to human activity.

For **Impact-BIO-8: Potential Burrowing Owl Breeding Impacts**

**MM-BIO-6: Burrowing Owl Preconstruction Surveys.** Prior to initiation of project clearing, grading, grubbing, or other construction activities, pre-construction surveys for the presence of burrowing owl, to verify species absence, will be conducted, including surveying suitable habitat within the project footprint and a 300-foot buffer by a qualified biologist; no grading shall occur within 300 feet of an active burrowing owl burrow. The pre-construction surveys shall follow the take avoidance survey methods outlined in the *Staff Report on Burrowing Owl Mitigation* (CDFW 2012). The first survey shall be conducted within 30 days of initial site disturbance, and the second survey shall occur within 24 hours of initial site disturbance.

Following the initial pre-grading survey, the project site will be monitored for new burrows each week until grading is complete. Subsequent pre-construction surveys will be required if lapses in the project occur that exceed 72 hours. If present in the project construction footprint or within 300 feet of the project site, coordination with CDFW and USFWS shall occur to establish measures to avoid potential impacts on burrowing owl. Such measures will be decided in coordination with the CDFW and USFWS and follow the "Strategy for Mitigating Impacts to Burrowing Owls in the Unincorporated County" (Attachment A of the County's Report Format and Content Requirements – Biological Resources).

Following the first pre-construction survey within 30 days of initial site disturbance, the qualified biologist will submit a Pre-Grading Survey Report to the County, CDFW, and USFWS within 14 days of the survey and include maps of the project site. If any burrowing owls are observed, the burrowing owl locations on aerial photos and in the format described in the mapping guidelines of the County's Report Format and Content Requirements – Biological Resources will be included. A qualified biologist will attend the pre-construction meeting to inform construction personnel about the burrowing owl requirements.

For **Impact-BIO-9**: **Impacts on Raptor Foraging Habitat**

**APM-BIO-1: Establishment of the Open Space Preserve** and **MM-BIO-9: Provide Compensatory Habitat-Based Mitigation** (see Threshold 2, below). Habitat-based mitigation will be provided consistent with **MM-BIO-9**, below, for significant impacts on raptor foraging habitat.

For **Impact-BIO-10**: **Habitat Impacts on Special-Status Bats**

**APM-BIO-1: Establishment of the Open Space Preserve** and **MM-BIO-9: Provide Compensatory Habitat-Based Mitigation** (see Threshold 2, below). Habitat-based mitigation will be provided consistent with **MM-BIO-9**, below, for significant impacts on pallid bat foraging habitat.

**MM-BIO-7: Support Pallid Bat.** ~~The~~ County DPR shall work with a bat expert to design and install bat boxes that attract pallid bat prior to vegetation removal activities commencing on the site. These bat boxes should be designed to accommodate both solitary individuals and maternal roost sites. Bat box design should reflect the best practices at the time of installation and be specific to larger-sized bats like pallid bat with respect to roost chamber sizes, etc. Design and placement of bat boxes should also consider how to best maintain proper roost temperature. When possible, the bat boxes should be placed along the edges of the wooded areas on the site. Final design, numbers, and placement of bat boxes will be determined by the bat expert in consultation with County DPR using the best practices known at the time.

Monitoring of the bat boxes shall be conducted quarterly for the first 2 years and twice-yearly during years 3 through 5 after installation. Any problems that are noted (e.g., mortality, predation) shall be addressed in consultation with the bat expert. Occupancy status, including species, numbers, etc., shall be documented to the extent possible without disturbing the occupants. If, after the first 2 years, a bat box remains unoccupied by any bat species, ~~the~~ County DPR and bat expert will discuss if the bat box needs to be repositioned on the site or redesigned. An annual report shall be prepared by the bat expert or designee to document the findings of the monitoring visits. The County will provide copies of this annual report to the CDFW and also include updates on the bat box monitoring on the site in the County's annual report for the MSCP.

For **Impact-BIO-11: Potential Impacts on Maternal Bat Roost Sites**

**MM-BIO-8: Bat Roost Avoidance.** Because of the difficulty in detecting all potentially occurring roosting bats (e.g., the western red bat within the Engelmann oaks, pallid bats within rock crevices), no construction activities that could disturb maternal roost site will occur during the pupping season (typically April 1 through August 31). This measure specifically precludes high-frequency surveying as well as intensive noise-generating activities (e.g., jack-hammering) within 200 feet of any Engelmann oaks or rock outcrops during the pupping season.

If construction activities must occur within this 200-foot avoidance buffer during the pupping season, the County will conduct definitive bat roost surveys to determine the presence or absence of maternal day-roost and/or night-roost locations within the 200-foot avoidance buffer that overlaps the construction footprint. The bat biologist(s) who conduct these surveys shall have the appropriate education, training, and experience. The bat roost survey methodology will be described in a Bat Roost Management, Monitoring, and Mitigation Plan, which will be prepared at least 30 days prior to the start of construction and provided to CDFW.

Bat roost survey methods may include mist netting and tracking individual bats using telemetry and/or additional acoustic surveys that are timed to determine if individual Engelmann oaks or rock outcrops within the 200-foot avoidance buffer are supporting bat roost sites. If any maternal roost sites within the 200-foot avoidance buffer are identified, an appropriate avoidance buffer shall be established around that roost site in accordance with the requirements established in the Bat Roost Management, Monitoring, and Mitigation Plan. Avoidance buffer distances will account for the ability of that individual bat species to tolerate specific types of low- and high-frequency construction noise and other human disturbance associated with the

project. No construction activities that could disrupt the roost site will be permitted within the established avoidance buffer.

Bat biologists will monitor construction activities occurring adjacent to the avoidance areas for the bat roost sites in accordance with the Bat Roost Management, Monitoring, and Mitigation Plan. Monitoring frequency and duration also will conform to the Bat Roost Management, Monitoring, and Mitigation Plan and be used to determine that the established bat roost avoidance buffers are large enough to prevent maternal roost site impacts, including, but not limited to, roost site abandonment. Avoidance buffers will be expanded if any stress or disturbance to the maternal roost site is observed during monitoring. In years 1, 3, and 5 following construction completion, the County will conduct bat surveys, including maternal bat roost surveys, within the areas originally surveyed prior to construction.

If the maternal bat roost sites previously observed prior to and during construction are still observed during these monitoring surveys, no additional mitigation will be required. If any maternal roost sites observed prior to or during construction are no longer present (i.e., are not observed in any of the three post-construction surveys), the County will mitigate for the loss of the maternal roost site at a 2:1 ratio using methods agreed upon in the Bat Roost Management, Monitoring, and Mitigation Plan. This may include planting additional Engelmann oaks within the proposed ~~preserve~~open space if the affected maternal roost site utilized Engelmann oak trees or by building artificial bat roosts specifically for the affected bat species.

For **Impact-BIO-12**: **Habitat Impacts on Special-Status Mammals**

**APM-BIO-1: Establishment of the Open Space Preserve** and **MM-BIO-9: Provide Compensatory Habitat-Based Mitigation** (see Threshold 2, below). Habitat-based mitigation will be provided consistent with **MM-BIO-9**, below, for significant impacts on special-status mammals.

For **Impact-BIO-13: Impacts on Group I Wildlife Species/California Species of Special Concern During Operation.**

**APM-BIO-1: Establishment of the Open Space Preserve** and **MM-BIO-9: Provide Compensatory Habitat-Based Mitigation** (see Threshold 2, below). Habitat-based mitigation will be provided consistent with **MM-BIO-9**, below, for significant impacts on special-status wildlife species resulting from implementation of the ~~proposed~~ project.

## Level of Significance After Mitigation

**Impact-BIO-1** through **Impact-BIO-~~10~~13** would be reduced to less than significant after implementation of **MM-BIO-1** through **MM-BIO-7** as well as **APM-BIO-1** and the habitat-based mitigation described under **MM-BIO-9**, below.

The planned Alpine Park Preserve, to be created with implementation of the project, contains all key habitat components required by QCB, including significant host plant populations, nectaring resources, and hilltops and ridgelines. The Alpine Park Preserve is also contiguous with existing conserved lands located within the Wright's Field Preserve. When combined, 98 percent of the known individual host plants associated with the Alpine Occurrence Complex would be conserved between the two preserves. Similarly, the permanent protection of habitat for special-status plant and wildlife species within the Alpine Park Preserve would add an additional 67.5 acres to the approximately 380 acres of open space (including Wright's Field and privately held open space land,

some of which is permanently protected through conservation easements) in the immediate vicinity. Furthermore, pre-construction nesting bird surveys would be conducted in accordance with **MM-BIO-5** to avoid direct mortality of eggs, chicks, or adults during the breeding season. As a result, **MM-BIO-1** through **MM-BIO-9** would reduce the project's impacts on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations or by CDFW or USFWS to a less-than-significant level.

## Open Space~~/Preserve~~

### Impact Discussion

County DPR would implement conservation measures in the project's Habitat Conservation Plan to preserve occupied habitat for QCB and ensure no net loss of QCB host plants from the project. The Habitat Conservation Plan proposes protection of habitat and permanent on-site restoration and enhancement of QCB habitat within the open space~~/preserve~~. Long-term management of the open space~~/preserve~~ would also occur as part of the County's commitment to species conservation as a signatory to the MSCP and as outlined in an RMP that will be prepared for the project.

There is the possibility that impacts on special-status wildlife and special-status plants may occur during long-term management and habitat restoration/enhancement activities. Palmer's grapplinghook, for instance, occurs in habitats similar to those of dot-seed plantain. Individual Palmer's grapplinghook occurrences have been mapped and included in the habitat enhancement plans, with specific measures to avoid these areas and any future occurrences of special-status plants that are noted during restoration/enhancement activities. There is also potential for inadvertent take of a small number of QCB to occur in the open space ~~preserve~~ when implementing habitat management activities through accidental trampling of QCB larvae. These impacts would be avoided by ensuring that habitat restoration/enhancement activities occur only outside of the flight season for QCB and that work directly within patches of dot-seed plantain is prohibited.

### Impact Determination

The purpose of the long-term management and habitat restoration activities is to improve habitat for special-status species. These benefits would outweigh potential impacts on special-status species resulting from management/restoration actions. As a result, impacts on special-status species from these actions would be less than significant.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

Impacts would be less than significant.

***Threshold 2: The project would have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by CDFW or USFWS.***

## County Park and Trails

### Impact Discussion

The clearing of native vegetation during grading and site preparation would be required for construction of the project. Development of the project would result in direct permanent impacts on up to 23.1 acres of land, of which 22.4 acres are considered sensitive natural communities and classified as Tier I through Tier III (Table 4.4-4) (Figure 4.4-1). Table 4.4-4 summarizes the maximum project impacts on habitat types/vegetation communities from development of the project.

**Table 4.4-4. Maximum Project Impacts on Vegetation Communities and Land Cover**

| Impact Type | | Permanent Impacts[d] | | | Temporary Impacts | | Impact Neutral | Total |
|---|---|---|---|---|---|---|---|---|
| Vegetation Community/Land Cover[a] | Tier[c] | Active Park | Leach Field | New Fire Fuel Modification Areas | Native Habitat Avoidance Area | Sewer Pipe | Maintenance of Existing Trails | |
| Disturbed Habitat (11300) | IV | 0.5 | 0.1 | < 0.1 | < 0.1 | — | 1.0 | 1.6 |
| Diegan Coastal Sage Scrub (32500), Including Disturbed and Baccharis Dominated (32530) | II | < 0.1 | — | — | < 0.1 | — | — | < 0.1 |
| Disturbed Flat-topped Buckwheat (32800) | II | 1.6 | 0.3 | 0.3 | 1.0 | < 0.1 | — | 3.2 |
| Flat-topped Buckwheat (32800) | II | 1.7 | — | 0.1 | 0.7 | < 0.1 | — | 2.4 |
| Flat-topped Buckwheat – Existing Fire Fuel Modification Zone (32800) | II | < 0.1 | — | — | — | — | — | < 0.1 |
| Coastal Sage-Chaparral Transition (37G00) | II | — | — | — | — | — | — | — |
| Southern Mixed Chaparral (37120) | III | — | — | — | — | — | — | — |
| Valley Needlegrass Grassland (42100) | I | 14.5 | — | — | <0.1 | — | — | 14.5 |
| Valley Needlegrass Grassland – Existing Fire Fuel Modification Zone (42100) | I | 0.3 | — | — | — | — | — | 0.3 |
| Disturbed Valley Needlegrass Grassland (42100) | I | — | — | — | — | — | — | — |
| Non-Native Grassland (42220) | III | 3.6 | — | — | — | — | — | 3.6 |
| Open Engelmann Oak Woodland (71181) | I | — | — | 0.1 | 0.4 | — | — | 0.5 |
| Non-Native Woodland (79000) | IV | < 0.1 | — | < 0.1 | < 0.1 | — | — | < 0.1 |
| Eucalyptus Woodland (79100) | IV | — | — | — | — | — | — | — |
| | **Total[b]** | **22.2** | **0.4** | **0.5** | **2.1** | **<0.1** | **1.0** | **26.1** |

a. Vegetation categories and numerical codes are from Holland (1986) and Oberbauer et al. (2008).
b. Individual rows may not sum to total because of rounding.
c. Tier categories are defined in the County's Biological Mitigation Ordinance.
d. An additional 471 square feet of impacts on sensitive natural communities would occur from implementation of the western spadefoot mitigation measure (**MM-BIO-4**), requiring the construction of three basins for spadefoot. It is not known exactly where these basins would be constructed, but impacts would be mitigated in accordance with **MM-BIO-9** and the ratios stipulated in the Biological Mitigation Ordinance.

### Construction

Permanent direct impacts on sensitive natural communities would occur, mostly within Valley needlegrass grassland, disturbed flat-topped buckwheat stands, Engelmann oak woodland, and non-native grasslands (**Impact-BIO-14**). Permanent direct impacts on Engelmann oak woodlands were reduced to a minimum during ~~the~~ County DPR's redesign of the concept plan for the proposed park in 2020. ~~The~~ County DPR would avoid all direct impacts (i.e., removal) of individual Engelmann oak trees during construction, and no construction activities (e.g., staging or grading) would occur within any dripline/canopy of Engelmann oaks. See Threshold 1, above, for a complete discussion of potential significant impacts associated with grading and fire clearing in the root protection zones of approximately 25 Engelmann oaks within Engelmann oak woodlands—specifically, within or under the canopy of seven Engelmann oaks. These impacts would be significant per **Impact-BIO-2**, above.

Construction of the project is not anticipated to cause indirect impacts on Valley needlegrass grassland, disturbed flat-topped buckwheat stands, Engelmann oak woodland, or non-native grasslands at levels that would be likely to harm sensitive habitats because of standard BMPs, such as dust control (see Section 4.4-2, *Existing Conditions*). Compliance with the General Construction Permit would require preparation of a Stormwater Pollution Prevention Plan for the project site, which would outline the BMPs that would be implemented during construction activities to prevent soil erosion and runoff from the construction site to nearby sensitive natural communities.

### Operation

Although anthropogenic presence is likely to increase through construction of Alpine Park, measures have been sought to reduce impacts on the sensitive natural communities in the adjacent open space~~/preserve~~. The current informal trail system would be converted to a more formalized system, discouraging unauthorized uses within open space~~/preserve~~. A permanent live-~~in~~on volunteer would also be situated within Alpine Park, which would further reduce indirect impacts on sensitive habitats through an increased monitoring presence in the area.

Fire fuel reductions zones associated with the ~~proposed~~ project are described in the introductory paragraph of Section 4.4.4. See Threshold 1, above, for a complete discussion of potentially significant impacts associated with fuel management activities that would occur within Engelmann oak woodlands, which would occur in coordination with a certified arborist. These impacts could potentially be significant per **Impact-BIO-2**, above.

## Impact Determination

**Impact-BIO-14: Direct Impacts on Sensitive Natural Communities.** Direct impacts on up to 22.4 acres of Tier I, II, and III sensitive natural communities (i.e., Valley needlegrass grassland, flat-topped buckwheat stands, non-native grasslands) would be significant.

The project would directly and permanently affect Engelmann oak woodland, Valley needlegrass, non-native grassland, and flat-topped buckwheat within a ~~Biological Resource Core Area (BRCA).~~BRCA. Engelmann oak woodland and Valley needlegrass are listed as Tier I vegetation communities, flat-topped buckwheat is listed as a Tier II vegetation community, and non-native grassland is listed as a Tier III vegetation community in Attachment K of the ~~Biological Mitigation Ordinance (BMO).~~BMO. Impacts on Tier I through Tier III vegetation communities would be significant, absent mitigation.

## Mitigation Measures

~~The~~ County DPR proposes the following applicant-proposed measure (APM) and mitigation measure to reduce **Impact-BIO-14** to below a level of significance.

**APM-BIO-1: Establishment of the Open Space Preserve:** As required under the County's MSCP Subarea Plan, Alpine Park Preserve will be managed in perpetuity in accordance with an RMP. This plan will outline management activities to be carried out by the County. The activities that are likely to be included in the RMP would enhance and preserve the affected sensitive natural communities. These activities include long-term monitoring of on-site preservation areas, non-native and invasive species vegetation management, and habitat restoration in the ~~preserve~~open space, as applicable. Through these strategic measures to mitigate for impacts, the preserved sensitive natural communities will be managed to maintain high-quality and functioning habitat and ~~the~~ County DPR will demonstrate its long-term commitment to species conservation within the open space~~/preserve~~.

**MM-BIO-9: Provide Compensatory Habitat-Based Mitigation.** To mitigate for potentially significant impacts on Tier I, Tier II, and Tier III habitats, the County will provide compensatory mitigation consistent with its BMO ~~to reduce significant impacts on sensitive vegetation communities. Mitigation will be provided within open space preserve and/or within offsite location(s), as summarized below~~mitigation ratios. Mitigation will be provided commensurate with the acres of impacts incurred during each phase of construction and will be provided through the following: 1) on-site preservation within the open space, 2) on-site restoration of non-native grassland (Tier III) to native grassland (Tier I) and 3) off-site restoration of non-native (Tier III) to native grassland (Tier I) within Wright's Field, anticipated only as a result of Phase 2 implementation and 4) off-site mitigation for non-native grasslands, anticipated only as a result of Phase 2 implementation.

Table 4.4-5. summarizes the maximum mitigation requirements if both Phase 1 and Phase 2 are implemented.

**Table 4.4-5. Maximum Mitigation Requirements**

| Tier[a] | Total Impacts | Mitigation Ratio | Maximum Mitigation Requirement | On-site Mitigation[b] | Off-site Mitigation (Phase 2 only) |
|---|---|---|---|---|---|
| Tier I | 14.86 | 2:1 | 29.73 | 17.48 acres of preservation plus 4.84 acres of restoration (see **MM-BIO-10**) | 7.41 acres of restoration in Wright's Field Preserve (see **MM-BIO-10**) |
| Tier II | 3.97 | 1.5:1 | 5.95 | 5.95 | None |
| Tier III | 3.57 | 1:1 | 3.57 | None | 3.57[b] |

a. Tiers correspond to those described in the County's BMO.
b. Habitat-based mitigation for permanent direct impacts on non-native grassland during Phase 2 implementation will be satisfied through purchase of credits and/or land acquisition of a similar high-quality non-native grassland in an off-site location.

**MM-BIO-10: Native Grassland Mitigation.** Impacts on 14.79 acres of Valley needlegrass grassland will be mitigated at a 2:1 ratio through preservation of 10.60 acres of Valley

needlegrass grassland and 6.88 acres of open Engelmann oak woodland on-site, in addition to 4.84 acres of restoration of non-native grassland to Valley needlegrass grassland within the County's parcel and 7.41 acres of restoration on Wright's Field Preserve. All restoration will be in accordance with a Habitat Restoration and Enhancement Plan (HREP) approved by the Wildlife Agencies (USFWS and CDFW). Success criteria established in that HREP will include achieving at least a 5 percent absolute cover of purple needlegrass within restoration areas while retaining cover and species composition similar to that of the native forbs currently present within non-native grassland areas on-site. If restoration does not meet the restoration goals, the County will implement adaptive management measures, to be approved by the Wildlife Agencies.

### Level of Significance After Mitigation

**APM-BIO-1, MM-BIO-9,** and **MM-BIO-10** would provide compensatory mitigation, including through preservation and restoration for **Impact-BIO-14,** thereby reducing potentially significant direct and permanent impacts on sensitive vegetation communities to less than significant.

## Open Space~~/Preserve~~

### Impact Discussion

The County's management of the Alpine Park Preserve has the potential to affect sensitive natural communities. County DPR will implement conservation measures in the project's Habitat Conservation Plan to ensure no net loss of QCB host plants from the project site. These activities will result in the potential for disturbance to sensitive natural communities within the QCB enhancement areas, such as trampling and raking vegetation to reduce the total load of non-native grass seeds. Restoration of non-native grass areas to native grasslands also could result in similar impacts. Long-term management of the open space~~/preserve~~ will occur as part of the County's commitment to species conservation as a signatory to the MSCP and as outlined in a RMP that will be prepared for the project. These impacts are intended to improve sensitive natural communities over the long-term, and as such, the overall improvement to these habitats would far outweigh any short-term temporary impacts that might occur during restoration work. As such, impacts associated with the County's management of its open space in the Alpine Park Preserve would be less than significant.

### Impact Determination

Impacts on sensitive natural communities from the proposed long-term management and habitat restoration/enhancement activities within the open space~~/preserve~~ would be less than significant.

~~**Impact-BIO-14: Direct Impacts on Sensitive Natural Communities.** Direct impacts on up to 22.3 acres of Tier I, II, and III sensitive natural communities (i.e., Valley needlegrass grassland, flat-topped buckwheat stands, and nonnative grasslands) would be significant.~~

~~The project would directly and permanently affect Engelmann oak woodland, Valley needlegrass, nonnative grassland, and flat-topped buckwheat within a Biological Resource Core Area (BRCA). Engelmann oak woodland and Valley needlegrass are listed as Tier I vegetation communities, flat-topped buckwheat is listed as a Tier II vegetation community, and nonnative grassland is listed as a Tier III vegetation community in Attachment K of the Biological Mitigation Ordinance (BMO). Impacts on Tier I through Tier III vegetation communities would be significant, absent mitigation.~~

### ~~Mitigation Measures~~

~~The County DPR proposes **APM-BIO-1** and **MM-BIO-9** (above) to reduce **Impact-BIO-14** to below a level of significance.~~

### ~~Level of Significance After Mitigation~~

~~**APM-BIO-1, MM-BIO-9,** and **MM-BIO-10** would provide compensatory mitigation, including through preservation and restoration for **Impact-BIO-14,** thereby reducing potentially significant direct and permanent impacts on sensitive vegetation communities to less than significant.~~

***Threshold 3: The project would not have a substantial adverse effect on ~~s~~State or federally protected wetlands (including, but not limited to marshes, vernal pools, coastal areas, etc.) through direct removal, filling, hydrological interruption, or other means.***

### Impact Discussion

No wetland features or aquatic resources were found within the BSA during any field surveys. As a result, there would be no impact on any ~~s~~State or federally protected wetlands (including, but not limited to, marshes, vernal pools, coastal areas) from the project.

### Impact Determination

The project would not have a substantial adverse effect on ~~s~~State or federally protected wetlands. Impacts would be less than significant.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

Impacts would be less than significant.

***Threshold 4: The project would not substantially interfere with the movement of any native resident or migratory fish or wildlife species, or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites.***

### Impact Discussion

The BSA and the adjacent Wright's Field are surrounded by low-density exurban residential development. As such, the BSA and Wright's Field currently function as an "island" of habitat with limited connectivity to open space and other preserve areas. The project would be constructed at the eastern edge of this island of open space~~/preserve~~, leaving a smaller but similarly situated island of habitat west of the active park.

Residential development within the past 15 to 20 years in the vicinity of the project site has substantively changed how wildlife can move north and east of the County's parcel. Specifically, three large houses north of the County parcel along Engelmann Oak Lane were built during this time period, restricting the movement of terrestrial mesofauna to the north. Two additional homes east of the intersection of South Grade and Boulder Oak Lane were also built in this timeframe. These homes constrain wildlife movement from the far northeastern corner of the County parcel to points farther east. Large-lot residential development, many with fences around their perimeter, currently restricts wildlife movement from due east of the County parcel to points farther east. Wildlife movement, therefore, north and east of the County parcel is already constrained to backyards where there are gaps in fences or where animals can move under or over fences. Development of the equestrian center at the northern end of the proposed active park would further restrict east–west movement at this northeastern edge of the County parcel; however, an area of open space (where the leach field for the septic system is proposed), approximately 100 feet in width, would remain in this area for east–west movement of terrestrial fauna.

On the southern end of the proposed park, development could potentially constrain wildlife movement from south to north for approximately 500 feet where the active park is proposed directly north of the Findel Ranch portion of Wright's Field. This 500-foot stretch represents only approximately 30 percent of the total linear distance where wildlife ostensibly cross from protected lands (i.e., the Findel Ranch section of Wright's Field) south of South Grade Road into the Wright's Field/County parcel to the north, or vice-versa. Approximately 1,060 feet remain where wildlife could cross from the Findel Ranch portion of Wright's Field into the proposed Alpine Park Preserve, ensuring that wildlife movement would continue to the extent it currently does in that portion. Most small mammals/meso-carnivore that are expected to use these habitat blocks can utilize widths of less than 1,000 feet as movement corridors. As a result, a reduction of approximately 30 percent of the width of this corridor from the ~~proposed~~ project would not substantially change wildlife movement patterns from baseline conditions.

Development of the Project would not significantly alter the way that wildlife utilize this contiguous block of open space. The conversion of 22.4 acres of native habitat to a developed park facility would not significantly constrain wildlife movement because the park would be adjacent to existing development on three sides and situated at the far eastern edge of the approximately 450-acre contiguous block of habitat in the immediate vicinity (i.e., the adjacent Wright's Field Preserve and privately held, directly contiguous open space lands in the immediate vicinity of the ~~proposed~~ Project, some of which are protected through a conservation easement). The Alpine Park Preserve would be created on the western edge of the park, contiguous to Wright's Field Preserve, and maintained as an MSCP preserve in perpetuity. Trails would be utilized by medium and large mammals for ease of movement through the ~~preserve~~open space, similar to baseline conditions. No features would be constructed that would impinge any movement areas, including ridgelines or canyons.

There is the potential for more vehicle collisions along South Grade Road compared to baseline conditions because the proposed park would draw additional vehicles to this portion of South Grade Road. However, there is currently a risk associated with this crossing, and the relative impact of the park on traffic in this area is not anticipated to result in a significant impact on existing wildlife movement in this area.

### Impact Determination

The project would not result in substantial interference with the movement of any native resident or migratory fish or wildlife species, or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites. Impacts would be less than significant.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

Impacts would be less than significant.

***Threshold 5: The project would conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance, or conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or ~~s~~State Habitat Conservation Plan.***

### Impact Discussion

The project would be consistent with the MSCP, the County General Plan, and the ACP. It would not conflict with any Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or ~~s~~State Habitat Conservation Plan. This is described within the *Multiple Species Conservation Program Conformance Statement* document, which is included as ~~Attachment E of this~~Appendix D1 to the Recirculated Draft EIR.

The proposed volunteer parking pad would be within the northern end of Alpine Park. The location results in the need for a Zone A and Zone B fire fuel modification zone, as described above. The County Consolidated Fire Code, Section 4907.2, Fuel Modification (f), states:

> When the subject property contains an area designated to protect biological or other sensitive habitat or resource, no building or other structure requiring a fuel modification zone shall be located so as to extend the fuel modification zone into a protected area.

The County redesigned the site plan in the fall of 2022 to move the volunteer parking pad from its previous location, approximately 12 feet from the edge of the proposed ~~preserve,~~open space and avoid having the fire fuel modification zone (Zone A and Zone B) extend into the ~~preserve~~open space. Its new location is more centrally located, directly adjacent to the equestrian staging area; it extends into the Native Habitat Avoidance Area within the equestrian center loop road. The Native Habitat Avoidance Area would be preserved after construction is complete. As such, the placement of this volunteer parking pad is not entirely consistent with these provisions in the County Consolidated Fire Code and as such, the impacts would be significant (**Impact-BIO-15**).

### Impact Determination

**Impact-BIO-15: Conflicts with County Consolidated Fire Code**. The project would potentially conflict with the County's Consolidated Fire Code—specifically, the provision to prevent impacts within a biological open space~~/preserve~~ contained in Section 4907.2, Fuel Modification (f). Impacts would be potentially significant, absent mitigation.

## Mitigation Measures

~~The~~ County DPR proposes the following APM and mitigation measure to reduce **Impact-BIO-15** to below a level of significance.

> **APM-BIO-1: Establishment of the Open Space Preserve** ~~and~~**, MM-BIO-9: Provide Compensatory Habitat-Based Mitigation**, and **MM-BIO-10: Native Grassland Restoration** (see Threshold 2). Habitat-based mitigation will be provided ~~consistent with **MM-BIO-9**, above,~~ for significant impacts on ~~special-status reptiles~~sensitive natural communities and this mitigation will reduce the overall severity of the effect of placing the volunteer parking pad within the Native Habitat Avoidance Area.

## Level of Significance After Mitigation

Impacts would be less than significant after mitigation.

# 4.4.5 Summary of Significant Impacts

**Table 4.4-6. Summary of Significant Biological Resources Impacts and Mitigation Measures**

| Summary of Potentially Significant Impact(s) | Summary of Mitigation Measure(s) | Level of Significance After Mitigation | Rationale for Finding After Mitigation |
|---|---|---|---|
| **Impact-BIO-1: Significant Impacts on Decumbent Goldenbush** | **MM-BIO-1: Replace Decumbent Goldenbush** | Less than Significant | Mitigation ensures that no net loss of decumbent goldenbush individuals will occur. |
| **Impact-BIO-2: Potentially Significant Impacts on Engelmann Oaks** | **MM-BIO-2: Implement Engelmann Oak Avoidance and Minimization Measures** | Less than Significant | Any potential impacts on Engelmann oak resulting from grading or compaction in the root protection zone or fire clearing will be mitigated through on-site planting, resulting in no net loss of Engelmann oaks on-site. |
| **Impact-BIO-3: Significant Impacts on QCB-Occupied Habitat During Construction** | **MM-BIO-3: QCB Mitigation** | Less than Significant | Impacts on QCB-occupied habitat will be mitigated through permanent on-site preservation of occupied QCB habitat. Impacts on QCB host plants will be mitigated through a 1:1 replacement through on-site restoration and enhancement. Long-term monitoring of Quino populations on the site will occur; County to confirm persistence of Quino after 5 years or contribute to Quino recovery in a significant way in off-site locations. |
| **Impact-BIO-4: Significant Impacts on Western Spadefoot** | **MM-BIO-4: Western Spadefoot Mitigation** | Less than Significant | Impacts on one breeding pool will be mitigated by constructing three new breeding pools closer to the core breeding population on Wright's Field. Impacts during construction will be avoided by installing exclusionary fencing and translocating individuals to outside of the construction footprint. |

| Summary of Potentially Significant Impact(s) | Summary of Mitigation Measure(s) | Level of Significance After Mitigation | Rationale for Finding After Mitigation |
|---|---|---|---|
| **Impact-BIO-5: Habitat Impacts on Special-Status Reptiles** | **APM-BIO-1 Establishment of the Open Space Preserve**<br>**MM-BIO-9: Provide Compensatory Habitat-Based Mitigation** | Less than Significant | Permanent protection of habitat for these species will occur within the Alpine Park Preserve and potentially in off-site locations (non-native grasslands), reducing impacts to less than significant. |
| **Impact-BIO-6: Habitat Impacts on Special-Status Avian Species** | **APM-BIO-1 Establishment of the Open Space Preserve**<br>**MM-BIO-9: Provide Compensatory Habitat-Based Mitigation** | Less than Significant | Permanent protection of habitat for these species will occur within the Alpine Park Preserve and potentially in off-site locations (non-native grasslands), reducing impacts to less than significant. |
| **Impact-BIO-7: Impacts on MBTA-Protected Avian Species During Breeding Season** | **MM-BIO-5: Avoid and Minimize Impacts on Special-Status Avian Species and Other Birds Protected under the MBTA** | Less than Significant | Avoidance of nests during construction will ensure no direct mortality of eggs or chicks will occur. |
| **Impact-BIO-8: Potential Impacts on Breeding Burrowing Owl** | **MM-BIO-6: Burrowing Owl Preconstruction Surveys.** | Less than Significant | Pre-construction take avoidance surveys will be conducted to avoid take of any breeding burrowing owls on-site. If found, consultation with the wildlife agencies will occur to ensure burrowing owl are not negatively affected by the project. |
| **Impact-BIO-9: Impacts on Raptor Foraging Habitat** | **APM-BIO-1 Establishment of the Open Space Preserve**<br>**MM-BIO-9: Provide Compensatory Habitat-Based Mitigation** | Less than Significant | Permanent protection of habitat for these species will occur within the Alpine Park Preserve and potentially in off-site locations (non-native grasslands), reducing impacts to less than significant. |

| Summary of Potentially Significant Impact(s) | Summary of Mitigation Measure(s) | Level of Significance After Mitigation | Rationale for Finding After Mitigation |
|---|---|---|---|
| **Impact-BIO-10: Habitat Impacts on Special-Status Bats** | **MM-BIO-7: Protect Pallid Bat** | Less than Significant | Pallid bat boxes will help attract pallid bats to a permanently protected location in ~~the county~~San Diego County (i.e., the open space/preserve) where there is a higher chance for long-term reproductive success than in private parcels where long-term persistence of this species is less certain. Potential stress to pallid bat from the loss of foraging habitat on the project site will be offset by access to bat boxes, providing safe, secure roost sites. |
| | **APM-BIO-1: Establishment of the Open Space Preserve**<br>**MM-BIO-9: Provide Compensatory Habitat-Based Mitigation** | | Permanent protection of habitat for these species will occur within the Alpine Park Preserve and in off-site locations (non-native grasslands), reducing impacts to less than significant. |
| **Impact-BIO-11: Potential Impacts on Maternal Roost Sites** | **MM-BIO-8: Bat Roost Avoidance** | Less than Significant | Avoiding construction activities that could negatively affect the reproductive outcomes of roosting bats will reduce potential significant impacts on these species. |
| **Impact-BIO-12: Habitat Impacts on Special-Status Mammals** | **APM-BIO-1 Establishment of the Open Space Preserve**<br>**MM-BIO-9: Provide Compensatory Habitat-Based Mitigation** | Less than Significant | Permanent protection of habitat for this taxa group will occur within the Alpine Park Preserve and potentially in off-site locations (non-native grasslands), reducing impacts to less than significant. |
| **Impact-BIO-13: Operational Impacts on Special-Status Wildlife Species** | **APM-BIO-1 Establishment of the Open Space Preserve**<br>**MM-BIO-9: Provide Compensatory Habitat-Based Mitigation** | Less than Significant | Permanent protection of habitat for these groups will occur within the Alpine Park Preserve and potentially in off-site locations (non-native grasslands), reducing impacts to less than significant. |

| Summary of Potentially Significant Impact(s) | Summary of Mitigation Measure(s) | Level of Significance After Mitigation | Rationale for Finding After Mitigation |
|---|---|---|---|
| **Impact-BIO-14: Direct Impacts on Sensitive Natural Communities** | **APM-BIO-1: Establishment of the Open Space Preserve**<br><br>**MM-BIO-9: Provide Compensatory Habitat-Based Mitigation**<br><br>**MM-BIO-10: Native Grassland Mitigation** | Less than Significant | **APM-BIO-1, MM-BIO-9,** and **MM-BIO-10** provide compensatory mitigation, including preservation and restoration, for **Impact-BIO-14,** thereby reducing potentially significant direct and permanent impacts on sensitive vegetation communities to less than significant. |
| **Impact-BIO-15: Conflicts with County Consolidated Fire Code** | **APM-BIO-1: Establishment of the Open Space Preserve**<br><br>**MM-BIO-9: Provide Compensatory Habitat-Based Mitigation**<br><br>**MM-BIO-10: Native Grassland Mitigation** | Less than Significant | The purpose of the provision in the County Consolidated Fire Code that requires fire fuel management zones not to extend into ~~preserve~~open space areas is to reduce impacts on sensitive natural communities and the species that depend on them. **APM-BIO-1, MM-BIO-9,** and **MM-BIO-10** provide compensatory mitigation, including preservation and restoration, thereby reducing ~~potentially significant direct and permanent impacts on sensitive vegetation communities to less than significant.~~the overall severity of the placement of infrastructure within and adjacent to open space areas. |

Section 4.5
# Cultural Resources

## 4.5.1 Overview

A cultural resources study ~~was conducted for purposes of this DEIR. That study included~~including a record search~~;~~, literature review~~; an onsite~~, cultural resources survey~~,~~ totaling approximately 96.6 acres~~;~~, and testing/evaluation of two ~~identified~~ archaeological sites~~. The complete study is available~~ was conducted in ~~Appendix E to this document. In addition to identifying potential environmental effects~~support of the ~~project,~~effort to create the proposed Alpine Park (Appendix E). The current cultural ~~resources study~~resource survey was completed ~~in order~~ to identify and map existing resources within the project site and to provide ~~the~~ County DPR with management information for ~~the proper~~ handling ~~of~~ potentially significant cultural resources~~, should they be found.~~. These measures include preservation recommendations, protective ~~actions~~ measures, and potential interpretive and educational opportunities.

## 4.5.2 Existing Conditions

The project is located at elevations ranging from approximately 1,886 to 2,054 feet above mean sea level. The geography of the project site includes steep hills with rolling knoll tops on the eastern half and abundant bedrock outcrops. The project site also includes rolling grasslands, and openings in coastal sage scrub and Engelmann oak woodlands. The project site lies within the Peninsular Ranges geomorphic province of California, a region characterized by northwest-trending faults and structural blocks with intervening valleys. Regional geologic maps for the area indicate that bedrock underlying the project site is situated atop three distinct geologic categories: pre-Cretaceous metamorphic rocks, Cretaceous granitic rocks, and Eocene sedimentary rocks. The pre-Cretaceous rocks consist of various metamorphic types. The granitic rocks, consisting of granite, granodiorite, and gabbro, are part of the southern California batholith in the area.

The project site is within a small area of Eocene non-marine sedimentary rock (e.g., Poway conglomerate), surrounded by Mesozoic basic intrusive rock (gabbro and diorite) and Mesozoic granitic rocks (Kennedy and Larson 1975). The soils mapped for the project site are Bosanko stony clay, 5 to 9% slopes; Fallbrook rocky sandy loam, 9 to 30% slopes, eroded; Cienaba very rocky coarse sandy loam, 30 to 75% slopes; and Cienaba-Fallbrook rock sandy loams, 9 to 30% slopes, eroded (USDA 1973). These soils generally support annual grasses and forbs, flattop buckwheat, chamise, California sagebrush, and oak or broadleaf chaparral (USDA 1973). The project site is largely undeveloped although not undisturbed. Past grazing and agricultural activities have changed the landscape over time. The project site has several active and passive trails and has been subject to past vegetation grubbing and clearing. It is covered in a mixture of native vegetation and nonnative grasses. Ground visibility was fair to poor throughout most of the project site, ranging from 10–90% (averaging 50%) in the uplands, 0–20% (averaging 15%) in the chaparral along the drainages and slopes, and 10–40% (averaging 25%) in grassy meadows.

## 4.5.2.1 Methodology

A cultural resources records search was conducted for the project at the South Coastal Information Center (SCIC) at San Diego State University on April 24, 2019. The SCIC cultural resources records search indicated that 26 cultural resources have been recorded within 0.25 mile of the project site, 4 of which are plotted within the project site. Of these 26 resources, 20 are prehistoric resources, 5 are historic period resources, and ~~one~~1 is a multicomponent resource.

~~An onsite~~The survey ~~was conducted which confirmed~~of the ~~location of~~project site relocated the four previously recorded cultural resources and did not identify any new cultural resources. The four resources reported within the project site consist of three prehistoric resources—bedrock milling sites (CA-SDI-5199, CA-SDI-19332, and CA-SDI-19333)—and one historic house complex archaeological site (CA-SDI-12236). One of the prehistoric resources (CA-SDI-5199) has been previously tested and determined to be ineligible for ~~either~~ the National Register of Historic Places (NRHP) or California Register of Historical Resources (CRHR). The remaining two (CA-SDI-19332 and CA-SDI-19333) were ~~not previously evaluated and therefore~~unevaluated then were ~~presently~~ tested and evaluated to determine~~; (a)~~ whether subsurface deposits are present, ~~(b) if so,~~ to define site boundaries and ~~(c) subsquently~~ assess resource significance. CA-SDI-19332 and CA-SDI-19333 are located within the proposed active park area~~; they~~ and were therefore tested through the excavation of subsurface ~~using~~ shovel test pits ~~evaluated~~ for their potential significance as resources eligible for the CRHR. Historic site CA-SDI-12236 was ~~also confirmed to be present, but was~~relocated and found to be in poor condition with many of the originally recorded features ~~having been substantially~~ deteriorated. ~~Site~~ CA-SDI-12236 is located within the proposed open space~~/preserve area, outside the proposed active park area, and was therefore~~ and was not evaluated for its potential eligibility for listing on the CRHR~~. However,~~, although based on the survey ~~observations,~~results the site appears unlikely to be significant.

## 4.5.2.2 Subsurface Conditions

The project site~~-~~ is largely undeveloped although some disturbance is evident through grubbing, clearing, recreational use, and past agricultural activities. Therefore, it can be assumed that anywhere from the top 3 to 18 inches of soil ~~-ha~~ves been previously disturbed across the project site, with the rocky and step areas being less likely to have much previous disturbance. This disturbance was visible in the excavations conducted at the three prehistoric sites. Such disturbance does not preclude the possibility for intact archaeological deposits to be present below the disturbance; however, archaeological testing at the sites does not suggest intact significant deposits are very likely ~~to be found~~ in the project site.

## 4.5.2.3 History of the Project Site

### Prehistoric Period

The approximately 10,000 years of documented prehistory of the San Diego region has often been divided into three periods: the Early Prehistoric Period (San Dieguito complex), Archaic Period (Millingstone Horizon, Encinitas tradition, La Jolla and Pauma complexes), and Late Prehistoric Period (Cuyamaca and San Luis Rey complexes).

## Early Prehistoric Period Complexes

The Early Prehistoric Period encompasses the earliest documented human habitation in the region; the San Dieguito complex is the earliest reliably dated occupation of the area. The assemblage of artifacts associated with this complex has been studied and elaborated upon extensively ~~[(~~Rogers 1939, 1945, 1966; Warren and True (1961); Warren (1967); Moriarty (1969, 1987~~)]~~.). The complex correlates with Wallace's (1955) Early Man Horizon, and Warren subsequently defined a broader San Dieguito tradition (1968). The earliest component of the Harris Site (CA-SDI-149/316/4935B) is located along the San Dieguito River northwest of the project site and is characteristic of the San Dieguito complex (Warren 1966, 1967; Warren and True 1961). Artifacts from the lower levels of the site include leaf-shaped knives; ovoid bifaces; flake tools; choppers; core and pebble hammerstones; and several types of scrapers, crescents, and short-bladed shouldered points (Warren and True 1961; Warren 1966). Little evidence for the San Dieguito Complex/Early Man Horizon has been discovered north of ~~San Diego~~the County.

Some researchers interpret the San Dieguito complex as having a primarily, but not exclusively, hunting subsistence orientation (Warren 1967, 1968, 1987; Warren et al. 1998). Others see a more diversified San Dieguito subsistence system as possibly ancestral to, or as a developmental stage for, the subsequent, predominantly gathering-oriented complex denoted as the La Jolla/Pauma complex (cf. Bull 1983; Ezell 1987; Gallegos 1985, 1987, 1991; Koerper et al. 1991).

## Archaic Period Complexes

In the southern coastal region of California, the Archaic Period dates from circa (ca.) 8600 years before present (BP) to ca. 1300 BP (Warren et al. 1998). Archaic Period La Jolla/Pauma complexes have been identified from the content of archaeological site assemblages found dating to this period. These assemblages occur at a range of coastal and inland sites and appear to indicate that a relatively stable and sedentary hunting and gathering complex, possibly associated with one people, was present in the coastal and immediately inland areas of ~~San Diego~~the County for more than 7,000 years. La Jolla/Pauma complex sites are considered to be part of Warren's (1968) Encinitas tradition and Wallace's (1955) Millingstone Horizon. The inland, or Pauma complex, aspect of this culture lacks shellfish remains, but is otherwise similar to the coastal La Jolla complex and may, therefore, simply represent a non-coastal expression of the La Jolla complex (True 1958, 1980; True and Beemer 1982).

The content of Archaic Period La Jolla/Pauma site assemblages is characterized by manos and metates, shell middens, terrestrial and marine mammal remains, burials, rock features, cobble-based tools at coastal sites, and the increased presence of hunting equipment and quarry-based tools at inland sites. Artifact assemblages can also include bone tools; doughnut stones; discoidals; stone balls; plummets; biface points/knives; Elko-eared dart points; and beads made of stone, bone, and shell. Beginning at approximately 5500 BP and continuing during the latter half of the Archaic Period, evidence of hunting and the gathering and processing of acorns gradually increases through the area. The evidence in the archaeological record consists of artifacts such as dart points and the mortar and pestle, which are essentially absent during the early Archaic Period. The initial and subsequent increasing use of these technologies during the middle and late Archaic Period constitutes a major transition in how the prehistoric populations interacted with their environment in the southern coastal region. The period of this shift, from ca. 4000 to 1300 BP, has been designated as the Final Archaic Period (Warren et al. 1998).

## Late Prehistoric Period Complexes

In the San Diego area, the Late Prehistoric Period has been described as a time characterized by an increased number of sites, as well as "many technological innovations, and new patterns in material culture and belief systems" (McDonald and Eighmey 1998:III-1). This description, in fact, aptly describes the period for the entire ~~San Diego~~ County area. The archaeological record documents changes in tool and ornament types, burial practices, and site location choices that vary from those documented for the earlier periods, as described below.

The Cuyamaca Complex is identified in southern San Diego County (Meighan 1954; True 1966, 1970; True et al. 1974). Peoples of southern San Diego County (Cuyamaca, Yuman) are believed to be the ancestors of the Hokan-speaking Diegueño or Kumeyaay (Ipai/Tipai) occupying southern San Diego County at contact. During late prehistoric times, the project site would have been within the area commonly associated with the archaeologically defined Cuyamaca complex.

The project site is situated in the traditional territory of the people known to the Spaniards as the Diegueño, a term derived from the San Diego Mission Alcalá, with which these people came to be associated. This term was later adopted by anthropologists (Kroeber 1925) and further divided into the southern and northern Diegueño. Shipek (1982) initiated use of a Yuman language term, "Kumeyaay," for the people formerly designated as the Diegueño. The Kumeyaay are traditionally considered to be a collector/hunting society characterized by central-based nomadism.

The linguistic and language boundaries, as seen by Shipek (1982), subsume the Yuman speakers into a single nomenclature, the Kumeyaay, a name applied previously to the mountain Tipai or Southern Diegueño by Lee (1937), while Almstedt (1974:1) noted that Ipai applied to the Northern Diegueño with Tipai and Kumeyaay for the Southern Diegueño. However, Luomala (1978:592) has suggested that while these groups consisted of over 30 patrilineal clans, no singular tribal name was used, and thus referred to the Yuman-speaking people as Ipai/Tipai (Carrico 1998: V-3–V-7).

As with most hunting-gathering societies (Service 1966:33), Kumeyaay social organization was formed in terms of kinship. More specifically, the Kumeyaay possessed a patrilocal type of band organization with band exogamy (marriage outside of one's band) and virilocal marital residence (the married couple integrates into the male's band). The band is often considered as synonymous with a village or ranchería, which is a political entity. Following White (1963), Almstedt (1980:45) has suggested that the term ranchería be applied to both a social and geographical unit, as well as to the particular population and territory held in common by a native group or band. She also stressed that the territory for a ranchería might comprise a 30-square-mile area. Many households would constitute a village or ranchería, and several villages were part of a much larger social system, usually referred to as a consanguineal kin group (cimuL). The cimuL is typically an exogamous, multilocal, patrilineal descent unit, often widely dispersed in local lineage. The members of the cimuL do not intermarry because of their presumed common ancestry, but they maintain close relations and often share territory and resources (Sahlins 1968:23; Service 1971:105–106; Luomala 1963:287–289).

Other researchers have designated the San Diego River as a natural feature that divides the Kumeyaay between those people living north of it, the Ipai (Northern Diegueño), and those south of it and into Baja California, the Tipai (Southern Diegueño) (Langdon 1975:64–70; Hedges 1975:71–83). With a history stretching back at least 2,000 years, the Kumeyaay, at the point of contact, were, as described by Carrico, settled in permanent villages or rancherías with strong alliances. Carrico

has indicated the possible locations for a number of these villages in the ~~San Diego~~ County area (Carrico 1998).

Although the Kumeyaay exploited a large variety of terrestrial and marine food sources, emphasis was placed on acorn procurement and processing, as well as the capture of rabbit and deer. Shipek (1989) has strongly suggested that the Kumeyaay, or at least some bands of the Kumeyaay, were practicing proto-agriculture at the time of Spanish contact. While Shipek's evidence is difficult to verify, the Kumeyaay were certainly adept land and resource managers, with a history of intensive plant husbandry.

The Kumeyaay practiced many forms of spiritualism with the assistance of shamans (kuessay) and cimuL leaders. Spiritual leaders were not elected, nor did they inherit their position; they achieved status because they knew all the songs involved in ceremonies (Shipek 1991) and had an inclination toward the supernatural. Important Kumeyaay ceremonies included male and female puberty rites, the fire ceremony, the whirling dance, the eclipse ceremony, the eagle dance, and the cremation ceremony, as well as the yearly mourning ceremony (Spier 1923:311–326). The primary ceremonial direction among the Kumeyaay is east, with rock art and entrances to ceremonial enclosures usually facing this direction (Kroeber 1925:717). The Kumeyaay are the only California tribe known to possess a color-direction system, with white representing the east, green-blue the south, black the west, and red the north (Kroeber 1925:717).

### Historic Period

The first historic ownership of the project site was ~~at the time~~ when it was incorporated into the mission lands of Mission San Diego Alcala. Mission lands were appropriated for use as grazing land and growing crops. A map of the area from 1846 indicates the project site was at that time being used for growing grain. After the secularization of the missions in the 1830s, the mission lands were divided among those favored by the Mexican Governors of California. In 1846 a land grant that included all of Alpine was granted to Ramon and Leandro Osuna as part of a 13,000-acre rancho called Rancho Valle de las Viejas y Mesa del Arroz. However, the Osunas were absentee landholders and unable to establish their claim, and 8,877 acres were sold to Don Jose Antonio Aguirre, who retained ownership until 1862. The land went through several owners in the years afterwards~~.~~

~~Settlement~~, and settlement in Alpine did not become seriously established until the arrival of German and Swiss immigrants in ~~the1880s~~the 1880s. The project site remained undeveloped until it was purchased as part of a larger farm by Sydney and Anna Wright in 1920. The Wrights lived on the property until 1957. The remains of their home are in the northwest corner of the project site. Since that time, the project site has been subject to a variety of proposed development plans that were never brought to fruition. The project site remains undeveloped and has been used ~~by nearby residents~~ for years ~~as~~ unofficial recreational open space by nearby residents.

## 4.5.2.4 Archaeological Sites

### P-37-005199/CA-SDI-005199

This resource consists of a knoll/outcrop containing at least 15–22 bedrock milling features with at least 42 milling elements: 7 basins and 35 milling slicks. Bedrock is granitic rock: granodiorite and tonalite. The site also contains a thin scatter of ceramics and lithic debitage. The site was originally recorded in 1977 by Cook and described as two knolls with over 100 milling elements and an

extensive low density lithic scatter with approximately 75 artifacts. In 1978 the site was excavated by Van Horn. The site was cleared of vegetation and the artifacts surface collected, resulting in the recovery of 321 artifacts including a single mano, four cores, six scrapers, a blade, a drill point, and a small amount of faunal bone. Three pottery sherds were also recovered. Eight 1- by 1-meter units were excavated, resulting in the recovery of 120 artifacts, most within the top 10 centimeters of the soil.

Roth and Berryman evaluated the site in 1990, excavating two 1- by 1-meter units and 24 shovel test pits, resulting in the recovery of few artifacts (1 pottery fragment and 15 flakes). The study led to a reduction in the size of the site's boundaries. Based on the limited number of artifacts recovered during excavation and disturbance since 1978 the site was considered to have no further research potential and recommended as not significant.

The site was updated and ~~evaluated~~tested in 2008 by Robbins-Wade and Giletti for a proposed residential development and found to be in the same condition as the 1990 excavations, with nothing found to contradict the conclusion that the research potential of the site has been fulfilled by the previous work conducted by Cook, Van Horn, and Roth and Berryman.

The current survey found the site in similar condition to the survey conducted in 200~~9~~8. The site is fairly disturbed by several bike and pedestrian trails. Much of the bedrock milling surfaces were found to be in poor condition due to heavy exfoliation. Over 100 flakes and two tools of metavolcanic material were identified within the site's previously recorded boundaries, mostly in disturbed pathways on the southeast side of the site. The site's boundaries were not expanded and appear to be consistent with the site as recorded when updated in 200~~9~~8 rather than with the larger area identified in 1978. The site does not possess archaeological deposits that would qualify it as a historical resource eligible under any criteria for the CRHR under CEQA.

## P-37-030429/CA-SDI-019332

This resource consists of one bedrock milling feature with one slick. The current survey found the resource to be in poor condition: the milling surface has undergone severe exfoliation. No artifacts or midden soils were identified in the vicinity of the resource. The site was tested and evaluated for its potential significance and eligibility for the CRHR as ~~an~~a historical resource in December 2020. The site was tested through the excavation of four shovel test pits adjacent to the bedrock milling feature. None of the shovel test pits recovered any cultural material, and the site does not possess archaeological deposits that would qualify it as ~~an~~a historical resource eligible under any criteria for the CRHR under CEQA.

## P-37-030430/CA-SDI-019333

This resource consists of two granitic bedrock milling features each with one slick. The current survey relocated the resource—40 meters due south of the mapped location recorded at the SCIC—and found the surface of the rocks to be highly exfoliated. The site was tested and evaluated for its potential significance and eligibility for the CRHR as ~~an~~a historical resource in December 2020. The site was tested through the excavation of five shovel test pits adjacent to the bedrock milling feature. None of the shovel test pits recovered any cultural material, and the site does not possess archaeological deposits that would qualify it as ~~an~~a historical resource eligible under any criteria for the CRHR under CEQA.

### P-37-012236/CA-SDI-012236

This historic house complex recorded in 1991 includes a house foundation, garage, fishpond, and associated modern trash, as well as an in-ground concrete water storage feature. These may be associated with 1920–1957 Wright family ownership. Recorded artifacts included roofing material, wood, asphalt shingles, brick, cement rubble, cement foundations, rock walls, chimney remains, a concrete water tank, and one highly disturbed trash pit with white ware fragments, blue glass shards, and an iron frying pan. The site was identified during the 2008 study by Robbins-Wade and Giletti in much the same condition and was not evaluated as it was to be placed in open space and left undisturbed.

The far eastern portion of the site was revisited during the current survey. Several concrete and cobble foundations were consistent with the conditions recorded from 2008. No artifacts were identified within the surveyed portion of the resource.

## 4.5.2.5 Historic Built Environment

Research and survey of the project site yielded no evidence of substantial built-environment resource development within the project site during the historic period. No extant built environment resources have been identified within the project site.

# 4.5.3 Applicable Laws and Regulations

## 4.5.3.1 Federal

### National Historic Preservation Act

The project site has no federal action that would require compliance with the National Historic Preservation Act.

## 4.5.3.2 State

### California Environmental Quality Act

CEQA, which requires public agencies to evaluate the implications of their project(s) on the environment, includes significant historical resources as part of the environment. Public agencies must treat any cultural resource as significant, unless the preponderance of evidence demonstrates that it is not historically or culturally significant (California Code of Regulations [CCR] Title 14, Section 15064.5). A historical resource is considered significant if it meets the definition of a historical resource or a unique archaeological resource, as defined below.

### Public Resources Code Section 5024.1 (California Register of Historic Resources)

The cultural evaluation was conducted in compliance with Section 5024.1 of the California Public Resources Code (PRC) to identify archaeological or historical resources within the project site.

The term historical resource includes, but is not limited to, any object, building, structure, site, area, place, record, or manuscript that is historically or archaeologically significant or significant in the

architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, per PRC Section 5020.1(j).

In most situations, resources that meet the definition of a unique archaeological resource also meet the definition of historical resource. As a result, it is current professional practice to evaluate cultural resources for significance according to their eligibility for listing in the CRHR. For the purposes of this CEQA cultural resources study, a resource is considered significant if it meets the CRHR eligibility (significance and integrity) criteria. Individual resource recommendations of eligibility are provided in this report.

Even without a formal determination of significance and nomination for listing in the CRHR, the lead agency can determine that a resource is potentially eligible for such listing to aid in determining whether a significant impact would occur. The fact that a resource is not listed in the CRHR, or has not been determined eligible for such listing, and not included in a local register of historic resources does not preclude an agency from determining that a resource may be a historical resource for the purposes of CEQA.

## Public Resources Code Section 5097.5

PRC Section 5097.5 defines as a misdemeanor the unauthorized disturbance or removal of archaeological, historic, or paleontological resources located on public lands.

## Health and Safety Code 7050.5

With respect to the potential discovery of human remains, Sections 7050.5(b) and (c) of the California Health and Human Safety Code state the following:

~~a~~b. In the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the coroner of the county in which the human remains are discovered has determined, in accordance with Chapter 10 (commencing with Section 27460) of Part 3 of Division 2 of Title 3 of the Government Code, that the remains are not subject to the provisions of Section 27491 of the Government Code or any other related provisions of law concerning investigation of the circumstances, manner, and cause of any death and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation, or his or her authorized representative, in the manner provided in Section 5097.98 of the Public Resources Code. The coroner shall make his or her determination within 2 working days from the time the person responsible for the excavation, or his or her authorized representative, notifies the coroner of the discovery or recognition of the human remains.

~~b~~c. If the coroner determines that the remains are not subject to his or her authority and recognizes the human remains to be those of a Native American or has reason to believe that they are those of a Native American, he or she shall contact by telephone, within 24 hours, the Native American Heritage Commission (NAHC) (California Health and Human Safety Code Section 7050.5).

Of particular note to cultural resources is Subsection (c), which requires the coroner to contact the NAHC within 24 hours if discovered human remains are thought to be of Native American origin. After notification, NAHC will follow the procedures outlined in PRC Section 5097.98, which include notification of the most likely descendants, if possible, and the recommendations for treatment of the remains. Also, willful possession of Native American human remains, or artifacts taken from a grave or cairn is a felony under ~~s~~State law (PRC Section 5097.99).

### California Government Code Section 6254 (r) and 6254.10

California Government Code Sections 6254(r) and 6254.10 of the California Public Records Act were enacted to protect archaeological sites from unauthorized excavation, looting, or vandalism. Section 6254(r) explicitly authorizes public agencies to withhold information from the public relating to:

> "Native American graves, cemeteries, and sacred places maintained by the Native American Heritage Commission." Section 6254.10 specifically exempts from disclosure requests for "records that relate to archaeological site information and reports, maintained by, or in the possession of the Department of Parks and Recreation, the State Historical Resources Commission, the State Lands Commission, the Native American Heritage Commission, another state agency, or a local agency, including the records that the agency obtains through a consultation process between a Native American tribe and a state or local agency."

### California Government Code Section 7927.000 and 7927.005

California Government Code Section 7927.000 (Added by Stats. 2021, Ch. 614, Sec. 2. [AB 7]; effective January 1, 2022, operative January 1, 2023, pursuant to Sec. 7931.000) of the California Public Records Act was enacted to protect tribal cultural resources sites from unauthorized excavation, looting, or vandalism.

> "Section 7927.000, except as provided in Sections 7924.510, 7924.700, and 7929.610, this division does not require disclosure of any of the following:
>
> (a) Records of Native American graves, cemeteries, and sacred places.
>
> (b) Records of Native American places, features, and objects described in Sections 5097.9 and 5097.993 of the Public Resources Code, which are maintained by, or in the possession of, the Native American Heritage Commission, another state agency, or a local agency."

California Government Code Section 7927.005 is similar to Section 6254.10 in that it also allows for archaeological site information to be exempt from disclosure to the public. It is slightly different in that it is not specific to Native American graves, cemeteries, and sacred places and is more broad in covering archaeological sites.

> "Nothing in this division requires disclosure of records that relate to archaeological site information and reports maintained by, or in the possession of, the Department of Parks and Recreation, the State Historical Resources Commission, the State Lands Commission, the Native American Heritage Commission, another state agency, or a local agency, including the records that the agency obtains through a consultation process between a California Native American tribe and a state or local agency."

# 4.5.4 Project Impact Analysis

## 4.5.4.1 Methodology

The following significance criteria are based on Appendix G of the ~~State~~ CEQA Guidelines and provide the basis for determining significance of impacts associated with historical resources resulting from the implementation of the project. The determination of whether a historical resource impact would be significant is based on the professional judgment of ~~the~~ County DPR as Lead Agency supported by the recommendations of qualified personnel at ICF and is based wholly on the substantial evidence provided by the technical analysis conducted for the project.

# CEQA Guidelines for Determining Historical Resources

## Historical Resources

Historical resources may be designated as such through three different processes:

1. Official designation or recognition by a local government, pursuant to local ordinance or resolution per PRC Section 5020.1(k).
2. A local survey conducted pursuant to PRC Section 5024.1(g).
3. Listing in, or eligibility for listing in, the NRHP, per PRC Section 5024.1(d)(1).

The process for identifying historical resources is typically accomplished by applying the criteria for listing in the CRHR, per 14 CCR 4852, which states that a historical resource must be significant at the local, ~~s~~State, or national level under one or more of the following four criteria:

1. It is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage.
2. It is associated with the lives of persons important in our past.
3. It embodies the distinctive characteristics of a type, period, region, or method of construction; represents the work of a master; or possesses high artistic values.
4. It has yielded, or may be likely to yield, information important in prehistory or history.

To be considered a historical resource for the purpose of CEQA, the resource must also have integrity, which is the authenticity of a resource's physical identity, evidenced by the survival of characteristics that existed during the resource's period of significance. Resources, therefore, must retain enough of their historic character or appearance to be recognizable as historical resources and convey the reasons for their significance. Integrity is evaluated with regard to the retention of location, design, setting, materials, workmanship, feeling, and association. It must also be judged with reference to the particular criteria under which the resource is eligible for listing in the CRHR, per 14CCR 4852(c).

## Unique Archaeological Resources

A unique archaeological resource is defined in PRC Section 21083.2 as an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is high probability that it meets the following criteria:

- Contains information needed to answer important scientific research questions and for which there is a demonstrable public interest.
- Has a special and particular quality, such as being the oldest of its type or the best available example of its type.
- Is directly associated with a scientifically recognized important prehistoric or historic event or person.

# 4.5.4.2 Thresholds of Significance

## Appendix G of the ~~State~~ CEQA Guidelines

The following significance criteria are based on Appendix G of the ~~State~~ CEQA Guidelines and provide the basis for determining the significance of impacts associated with cultural resources resulting from implementation of the project. The determination of whether a cultural impact would be significant is based on the professional judgment of ~~the~~ County DPR as Lead Agency supported by the recommendations of qualified personnel at ICF and is based on the evidence in the administrative record.

Impacts are considered significant if the project would result in any of the following:

1. Cause a substantial adverse change in the significance of a historical or archaeological resource as defined in Section 15064.5.
2. Directly or indirectly destroy a unique paleontological resource or site or unique geological feature.
3. Disturb any human remains, including those interred outside of formal cemeteries.

~~Impacts for the following thresholds were determined to be less than significant in the initial study/environmental checklist and are therefore not discussed further in this EIR.~~

~~1. Directly or indirectly destroy a unique paleontological resource or site or unique geological feature.~~

~~2. Disturb any human remains, including those interred outside of formal cemeteries.~~

## County of San Diego Guidelines for Determining Significance

The following significance criteria are based on the *County of San Diego Guidelines for Determining Significance for Cultural Resources: Archaeological and Historical Resources* (County of San Diego 2007). Impacts are considered significant if the project would result in any of the following:

1. Cause a substantial adverse change in the significance of a historical or archaeological resource as defined in Section 15064.5.
2. Directly or indirectly destroy a unique paleontological resource or site or unique geological feature.
3. Disturb any human remains, including those interred outside of formal cemeteries.

# 4.5.4.3 Project Impacts and Mitigation Measures

***Threshold 1: Implementation of the project would cause a substantial adverse change in the significance of a historical or archaeological resource as defined in Section 15064.5.***

## County Park and Trails

### Impact Discussion

#### Construction

Three of the four cultural resources (CA-SDI-5199, CA-SDI-19332, and CA-SDI-19333) identified during the survey have been tested and evaluated for listing in the CRHR and been recommended ineligible. One resource (CA-SDI-12236) has not been evaluated for listing in the CRHR and will be preserved in open space and the site will be avoided. The development of recreational activities must take into consideration potential impacts on cultural resources resulting from public access and increased public use at the entire project site. It is recommended that County DPR avoid, as much as possible, developing trails, staging areas, or other recreation areas that would allow for an increase in public access to or through sites. Trail development and maintenance activities may impact subsurface deposits, and the increase in traffic and accessibility may create direct impacts through vandalism, looting, or the inadvertent destruction of artifacts and site integrity.

Four cultural resources have been identified within the project site. Three of these resources have been previously evaluated under CEQA guidelines for listing on the CRHR and are recommended as not eligible for the CRHR and do not meet the threshold to qualify as unique archaeological resources. Ground-disturbing activities associated with construction of the project could potentially result in the discovery of previously unidentified cultural resources (**Impact-CUL-1**). Should previously undiscovered resources be identified they should be avoided where feasible. Any eligible sites that cannot be avoided in the development of the project site should be capped as a preservation measure. As a result of the potential for inadvertent damage or destruction of undisturbed archaeological resources, the project has the potential to materially alter physical characteristics that would qualify an archaeological resource for inclusion in the NRHP and CRHR (**Impact-CUL-1**). Therefore, the project has the potential to result in a significant impact on an archaeological resource. Mitigation measures consisting of preparation of a cultural resources monitoring and discovery plan (**MM-CUL-1**), cultural resources awareness training (**MM-CUL-2**), and conducting archaeological monitoring (**MM-CUL-3**) in areas where soils are previously undisturbed, would be necessary to reduce impacts to a less-than-significant level. Please refer to Section 4.18, *Tribal Cultural Resources,* for impacts and mitigation measures associated with tribal cultural resources.

#### Operation

Operations may include ground-disturbing work, such as irrigation repairs and additional landscaping. However, operational maintenance would involve shallow ground disturbance, whereas cultural resources are typically found deeper underground. Additionally, the areas where such operations would occur would be disturbed by construction where monitoring would be involved.~~Operation of the project would not result in ground disturbances or structural~~

~~modifications.~~ Therefore, in the absence of ground disturbances, no operations-related impacts on archaeological resources are expected to occur.

## Impact Determination

**Impact-CUL-1**: **Potential to Unearth and Damage Significant Archaeological Resources During Construction.** Excavation of the project has the potential to unearth and damage significant archaeological resources during construction of the project. Therefore, implementation of the project may cause a substantial adverse change in the significance of an archaeological resource as defined in ~~State~~ CEQA Guidelines Section 15064.5. Impacts would be potentially significant.

## Mitigation Measures

**MM-CUL-1: Prepare and Implement a Cultural Resources Monitoring and Discovery Plan.** Prior to the commencement of any ground-disturbing activities within previously undisturbed soils within the project area, ~~the~~ County DPR shall retain a qualified archaeologist (pre-approved by County DPR) who meets the Secretary of the Interior's Professional Qualification Standards (36 Code of Federal Regulations [CFR], Part 61) to prepare a Cultural Resources Monitoring and Discovery Plan (CRMDP) for the project area. Procedures to follow in the event of an unanticipated discovery apply to all project components. The CRMDP shall be submitted to ~~the~~ County DPR, as applicable based on the jurisdiction wherein the project component is located, and shall be reviewed and approved by County DPR, the relevant agency. If County DPR does not have in-house expertise to review the CRMDP, they shall respectively hire an expert who meets the Secretary of the Interior's Professional Qualification Standards (36 CFR 61) and ~~the~~ County DPR shall pay for said expert prior to the commencement of any ground-disturbing activities within the areas requiring archaeological monitoring.

County DPR's CRMDP review shall ensure that appropriate procedures ~~are in place~~ to monitor construction and treat unanticipated discoveries~~.~~ are in place. County DPR's review and approval of the CRMDP shall occur prior to the commencement of any construction activities subject to the requirements of the CRMDP. The CRMDP shall include required qualifications for archaeological monitors and supervising archaeologists and shall lay out protocols to be followed in relation to cultural resources, including both archaeological and tribal cultural resources. The CRMDP shall provide a summary of sensitivity for buried cultural resources. In addition, it shall describe the roles and responsibilities of archaeological and Native American monitors, County DPR, and construction personnel. The CRMDP shall describe specific field procedures to be followed for archaeological monitoring, including field protocol and methods to be followed should there be an unanticipated archaeological discovery. Evaluation of resources, consultation with Native American individuals, tribes and organizations, treatment of cultural remains and artifacts, curation, and reporting requirements shall also be described. The CRMDP shall also delineate the requirements, procedures, and notification processes in the event that unanticipated human remains are encountered.

The CRMDP shall delineate the area(s) that require archaeological monitoring. Mapping of the area(s) shall be made available to ~~the~~ County DPR, who shall incorporate this information into the respective construction specifications for the project.

**MM-CUL-2: Prepare and Implement a Cultural Resources Awareness Training Prior to Project Construction.** Prior to, and for the duration of, project-related ground disturbance

County DPR shall hire a qualified archaeologist, who meets the Secretary of the Interior's Professional Qualifications Standards (36 CFR 61) and approved by County DPR to provide cultural resources awareness training to project construction personnel. The training shall include a discussion of applicable laws and penalties under the law; samples or visual representations of artifacts that might be found in the project vicinity; and the steps that must be taken if cultural resources are encountered during construction, including the authority of archaeological monitors, if required to be on site during the project, to halt construction in the area of a discovery.

The cultural resources awareness training shall be conducted by a qualified archaeologist. A hard copy summary of cultural resources laws, discovery procedures, and contact information shall be provided to all construction workers. Completion of the training shall be documented for all construction personnel, who shall be required to sign a form confirming they have completed the training. The form shall be retained by County DPR to demonstrate compliance with this mitigation measure.

**MM-CUL-3: Conduct Archaeological and Native American Monitoring.**

An archaeological monitor or cross-trained archaeological/paleontological monitor and a Native American monitor shall be retained to observe all initial ground-disturbing activities, including brush clearance, vegetation removal, grubbing, grading, and excavation~~, within the recorded boundaries of P-36-005695.~~. The archaeological monitor shall meet the qualification standards of the California Office of Historic Preservation and shall be overseen by an archaeological principal investigator. The Native American monitor shall be selected from among the Native American groups identified by the NAHC as having affiliation with the project area. Prior to the start of ground-disturbing activities, the archaeological monitor shall conduct paleontological and cultural resources sensitivity training for all construction personnel. The Native American monitor or a representative shall be given the opportunity to participate. Construction personnel shall be informed of the types of paleontological or archaeological resources that may be encountered, and of the proper procedures to be enacted in the event of an inadvertent discovery of fossils, archaeological resources, or human remains. ~~The~~ County DPR shall ensure that construction personnel are made available for and attend the training and retain documentation demonstrating attendance.

Archaeological monitoring shall be conducted by an archaeologist familiar with the types of archaeological resources that could be encountered within the project site and, if possible, who is cross-trained in paleontological resource identification. The qualified archaeologist, in coordination with ~~the~~ County DPR and Native American monitor, may reduce or discontinue monitoring if it is determined that the possibility of encountering buried archaeological deposits is low based on observations of soil stratigraphy or other factors. Both the archaeologist and Native American monitor shall be empowered to halt or redirect ground-disturbing activities away from the vicinity of a discovery until the qualified archaeologist or paleontologist has evaluated the discovery and determined appropriate treatment. If prehistoric archaeological materials are encountered, the Native American monitor shall participate in any discussions involving treatment and subsequent mitigation.

The archaeological monitor shall keep daily logs detailing the types of activities and soils observed, and any discoveries. After monitoring has been completed, the qualified archaeologist shall prepare a monitoring report that details the results of monitoring. The report shall be

submitted to ~~the~~ County DPR and any Native American groups who request a copy. A copy of the final report shall be filed at the SCIC. Monitoring actions and procedures shall be completed per the CRMDP described in **MM-CUL-1**.

### Level of Significance After Mitigation

**Impact-CUL-1** would be reduced to a less-than-significant level after implementation of **MM-CUL-1** through **MM-CUL-3**, which would ensure preparation and implementation of a CRMDP and Cultural Resources Awareness Training, as well as archaeological and Native American monitoring.

***Threshold 2: The project would not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.***

## County Park and Trails and Open Space~~/Preserve~~

### Impact Discussion

Based on the results of the records search performed by the San Diego Natural History Museum, the project site features a range of low to no paleontological potential and moderate sensitivity. No recorded fossil localities were identified within 1 mile of the project site.

#### Construction

The primary type of activities that have the potential to directly destroy a unique paleontological resource or site are those that are ground disturbing. Construction of the project would include ground-disturbing activities such as grading and excavation. As described above, portions of the project site, including the potential Tavern Road sewer line option, are underlain by geologic units assigned low or no paleontological potential. In these areas, construction is unlikely to result in impacts on paleontological resources; therefore, impacts would be less than significant. However, the southern and western portions of the project site and portions of the potential South Grade Road sewer line option are underlain by a geologic unit with moderate paleontological sensitivity. Due to this sensitivity, ground-disturbing construction activities could result in impacts on paleontological resources (**Impact-CUL-2**). Any proposed excavation activities that extend deep enough to encounter previously undisturbed deposits have the potential to impact the paleontological resources possibly preserved underground. In these areas, construction activities are expected to include grading, digging, and excavation to prepare the site, build the active recreation facilities, and build the parking lots and infrastructure; as well as building the berm along the southeastern and southern boundaries of the site. To reduce the potential impact during construction activities, implementation of a paleontological resource mitigation program during ground-disturbing activities is required (**MM-GEO-1**).

#### Operation

Operation of the project may include ground-disturbing work, such as irrigation repairs and additional landscaping. However, operational maintenance would involve shallow ground disturbance, whereas cultural resources are typically found deeper underground. As such, operation of the project would not have the potential to result in impacts on paleontological resources.

## Impact Determination

The project would result in potential impacts on paleontological resources.

**Impact-CUL-2: Potential Impact on Paleontological Resources.** Ground-disturbing activities that would extend deep enough to encounter deposits in the southern and western portions of the project site would have the potential to impact paleontological resources.

## Mitigation Measures

**MM-GEO-1: Implement a Paleontological Resource Mitigation Program**. Ground-disturbing construction activities in the southern and western portion of the project site shall be subject to paleontological and geologic resource sensitivity screening prior to commencement of construction. The resource sensitivity screening shall determine which ground-disturbing activities would be deep enough to encounter previously undisturbed deposits of the Lusardi Formation. County DPR shall retain a Qualified Paleontologist who shall oversee paleontological monitoring by a qualified Paleontological Monitor or cross-trained Paleontological/ Archaeological monitor during ground-disturbing activities. The paleontological monitoring shall include the following measures:

- A Qualified Paleontologist shall attend the preconstruction meeting(s) to consult with the grading and excavation contractors or subcontractors concerning excavation schedules, paleontological field techniques, and safety issues.
- A Qualified Paleontologist or Paleontological Monitor or cross-trained Paleontological/ Archaeological Monitor shall be on site, on a full-time basis, during ground-disturbing activities that occur 10 feet or more below ground surface, to inspect exposures for contained fossils. The Paleontological Monitor shall work under the direction of the project's Qualified Paleontologist. A "Paleontological Monitor" shall be defined as an individual selected by the Qualified Paleontologist who has experience in monitoring excavation and the collection and salvage of fossil materials.
- If fossils are discovered on the project site, the Qualified Paleontologist shall recover them and temporarily direct, divert, or halt grading to allow recovery of fossil remains.
- The Qualified Paleontologist shall be responsible for the cleaning, repairing, sorting and cataloguing of fossil remains collected during the monitoring and salvage portion of the mitigation.
- The Qualified Paleontologist shall deposit and donate prepared fossils, along with copies of all pertinent field notes, photos, and maps, in a scientific institution with permanent paleontological collections, such as the San Diego Natural History Museum, approved by County DPR.
- Within 30 days after the completion of excavation and pile-driving activities, a final data recovery report shall be completed by the Qualified Paleontologist and submitted to County DPR for review and approval. The final report shall document the results of the mitigation and shall include discussions of the methods used, stratigraphic section(s) exposed, fossils collected, and significance of recovered fossils.

### Level of Significance After Mitigation

The implementation of **MM-GEO-1** would require the implementation of a Paleontological Resource Mitigation Program, which would prevent impacts on paleontological resources, and if fossils are unexpectedly discovered, would require the proper handling and recording of such fossils. Therefore, the implementation of **MM-GEO-1** would reduce **Impact-CUL-2** to less than significant.

***Threshold 3: The project would not disturb any human remains, including those interred outside of formal cemeteries.***

## County Park and Trails and Open Space

### Impact Discussion

#### Construction

The development of recreational activities must take into consideration potential impacts on cultural resources resulting from public access and increased public use at the entire project site. It is recommended that County DPR avoid, as much as possible, developing trails, staging areas, or other recreation areas that would allow for an increase in public access to or through sites. Trail development and maintenance activities may impact subsurface deposits, and the increase in traffic and accessibility may create direct impacts through vandalism, looting, or the inadvertent destruction of artifacts and site integrity.

Ground-disturbing activities associated with construction of the project could potentially result in the discovery of previously unidentified human remains (**Impact-CUL-3**). Should previously undiscovered resources be identified they should be avoided where feasible. Any eligible sites that cannot be avoided in the development of the project site should be capped as a preservation measure. As a result of the potential for inadvertent damage or destruction of undisturbed human remains, the project has the potential to disturb any human remains, including those interred outside of formal cemeteries (**Impact-CUL-3**). Therefore, the project has the potential to result in a significant impact on human remains resources. Mitigation measures regarding cultural resources can also be used to mitigate any potential impacts on human remain resources. These mitigation measures consist of the preparation of a cultural resources monitoring and discovery plan (**MM-CUL-1**), cultural resources awareness training (**MM-CUL-2**), and conducting archaeological monitoring (**MM-CUL-3**) in areas where soils are previously undisturbed, would be necessary to reduce impacts to a less-than-significant level. Please refer to Section 4.18, *Tribal Cultural Resources,* for impacts and mitigation measures associated with tribal cultural resources.

#### Operation

Operations may include ground-disturbing work, such as irrigation repairs and additional landscaping. However, operational maintenance would involve shallow ground disturbance, whereas human remains are typically found deeper underground. Additionally, the areas where such operations would occur would be disturbed by construction where monitoring would be involved. Therefore, in the absence of ground disturbances, no operations-related impacts on human remains resources are expected to occur.

## Impact Determination

**Impact-CUL-3: Potential to disturb any human remains, including those interred outside of formal cemeteries.** Excavation of the project has the potential to unearth and damage human remains during construction of the project. Therefore, implementation of the project may cause a substantial adverse effect on human remains as defined in CEQA Guidelines Section 15064.5. Impacts would be potentially significant.

## Mitigation Measures

**MM-CUL-1: Prepare and Implement a Cultural Resources Monitoring and Discovery Plan.** Prior to the commencement of any ground-disturbing activities within previously undisturbed soils within the project area, County DPR shall retain a qualified archaeologist (pre-approved by County DPR) who meets the Secretary of the Interior's Professional Qualification Standards (36 Code of Federal Regulations [CFR], Part 61) to prepare a Cultural Resources Monitoring and Discovery Plan (CRMDP) for the project area. Procedures to follow in the event of an unanticipated discovery apply to all project components. The CRMDP shall be submitted to County DPR, as applicable based on the jurisdiction wherein the project component is located, and shall be reviewed and approved by County DPR, the relevant agency. If County DPR does not have in-house expertise to review the CRMDP, they shall respectively hire an expert who meets the Secretary of the Interior's Professional Qualification Standards (36 CFR 61) and County DPR shall pay for said expert prior to the commencement of any ground-disturbing activities within the areas requiring archaeological monitoring.

County DPR's CRMDP review shall ensure that appropriate procedures to monitor construction and treat unanticipated discoveries are in place. County DPR's review and approval of the CRMDP shall occur prior to the commencement of any construction activities subject to the requirements of the CRMDP. The CRMDP shall include required qualifications for archaeological monitors and supervising archaeologists and shall lay out protocols to be followed in relation to cultural resources, including both archaeological and tribal cultural resources. The CRMDP shall provide a summary of sensitivity for buried cultural resources. In addition, it shall describe the roles and responsibilities of archaeological and Native American monitors, County DPR, and construction personnel. The CRMDP shall describe specific field procedures to be followed for archaeological monitoring, including field protocol and methods to be followed should there be an unanticipated archaeological discovery. Evaluation of resources, consultation with Native American individuals, tribes and organizations, treatment of cultural remains and artifacts, curation, and reporting requirements shall also be described. The CRMDP shall also delineate the requirements, procedures, and notification processes in the event that unanticipated human remains are encountered.

The CRMDP shall delineate the area(s) that require archaeological monitoring. Mapping of the area(s) shall be made available to County DPR, who shall incorporate this information into the respective construction specifications for the project.

**MM-CUL-2: Prepare and Implement a Cultural Resources Awareness Training Prior to Project Construction.** Prior to, and for the duration of, project-related ground disturbance County DPR shall hire a qualified archaeologist, who meets the Secretary of the Interior's Professional Qualifications Standards (36 CFR 61) and approved by County DPR to provide cultural resources awareness training to project construction personnel. The training shall

include a discussion of applicable laws and penalties under the law; samples or visual representations of artifacts that might be found in the project vicinity; and the steps that must be taken if cultural resources are encountered during construction, including the authority of archaeological monitors, if required to be on site during the project, to halt construction in the area of a discovery.

The cultural resources awareness training shall be conducted by a qualified archaeologist. A hard copy summary of cultural resources laws, discovery procedures, and contact information shall be provided to all construction workers. Completion of the training shall be documented for all construction personnel, who shall be required to sign a form confirming they have completed the training. The form shall be retained by County DPR to demonstrate compliance with this mitigation measure.

**MM-CUL-3: Conduct Archaeological and Native American Monitoring.**

An archaeological monitor or cross-trained archaeological/paleontological monitor and a Native American monitor shall be retained to observe all initial ground-disturbing activities, including brush clearance, vegetation removal, grubbing, grading, and excavation. The archaeological monitor shall meet the qualification standards of the California Office of Historic Preservation and shall be overseen by an archaeological principal investigator. The Native American monitor shall be selected from among the Native American groups identified by the NAHC as having affiliation with the project area. Prior to the start of ground-disturbing activities, the archaeological monitor shall conduct paleontological and cultural resources sensitivity training for all construction personnel. The Native American monitor or a representative shall be given the opportunity to participate. Construction personnel shall be informed of the types of paleontological or archaeological resources that may be encountered, and of the proper procedures to be enacted in the event of an inadvertent discovery of fossils, archaeological resources, or human remains. County DPR shall ensure that construction personnel are made available for and attend the training and retain documentation demonstrating attendance.

Archaeological monitoring shall be conducted by an archaeologist familiar with the types of archaeological resources that could be encountered within the project site and, if possible, who is cross-trained in paleontological resource identification. The qualified archaeologist, in coordination with County DPR and Native American monitor, may reduce or discontinue monitoring if it is determined that the possibility of encountering buried archaeological deposits is low based on observations of soil stratigraphy or other factors. Both the archaeologist and Native American monitor shall be empowered to halt or redirect ground-disturbing activities away from the vicinity of a discovery until the qualified archaeologist or paleontologist has evaluated the discovery and determined appropriate treatment. If prehistoric archaeological materials are encountered, the Native American monitor shall participate in any discussions involving treatment and subsequent mitigation.

The archaeological monitor shall keep daily logs detailing the types of activities and soils observed, and any discoveries. After monitoring has been completed, the qualified archaeologist shall prepare a monitoring report that details the results of monitoring. The report shall be submitted to County DPR and any Native American groups who request a copy. A copy of the final report shall be filed at the SCIC. Monitoring actions and procedures shall be completed per the CRMDP described in **MM-CUL-1**.

### Level of Significance After Mitigation

**Impact-CUL-3** would be reduced to a less-than-significant level after implementation of **MM-CUL-1** through **MM-CUL-3**, which would ensure preparation and implementation of a CRMDP and Cultural Resources Awareness Training, as well as archaeological and Native American monitoring.

## Open Space

### Impact Discussion

Open space~~/preserve~~ areas will remove areas and trails that are presently used by the public for a variety of purposes such as trail riding, hiking, dirt bike riding, and gatherings that could have the potential to impact previously identified cultural resources. The removal of some of these areas from active use near existing cultural resources would protect previously identified cultural resources from additional impacts. Use of existing trails for hiking, horseback riding, and biking would have minimal ground disturbance and therefore ~~little~~low to no potential to impact undiscovered or buried cultural resources.

### Impact Determination

#### ~~Impact Determination~~

Open space~~/preserve~~ uses would not result in significant impacts on cultural resources as no significant resources have been identified in areas of proposed hiking, horseback riding, or biking trails. Use of these trails would not result in ground disturbance that would impact buried undiscovered cultural resources; therefore, impacts on significant undiscovered cultural resources would not occur.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

Impacts would be less than significant.

# 4.5.5 Summary of Significant Impacts

**Table 4.5-1. Summary of Significant ~~Aesthetics and Visual~~Cultural Resources Impacts and Mitigation Measures**

| Summary of Potentially Significant Impact(s) | Summary of Mitigation Measure(s) | Level of Significance After Mitigation | Rationale for Finding After Mitigation |
|---|---|---|---|
| **Impact-CUL-1**: **Potential to Unearth and Damage Significant Archaeological Resources During Construction** | **MM-CUL-1: Prepare and Implement a Cultural Resources Monitoring and Discovery Plan.**<br>**MM-CUL-2: Prepare and Implement a Cultural Resources Awareness Training Prior to Project Construction.**<br>**MM-CUL-3: Conduct Archaeological and Native American Monitoring** | Less than Significant | **Impact-CUL-1** would be reduced to less than significant after implementation of **MM-CUL-1 through MM-CUL-3**, which would ensure preparation and implementation of a CRMDP and Cultural Resources Awareness Training, as well as archaeological and Native American monitoring. |
| **Impact-CUL-2: Potential to directly or indirectly destroy a unique paleontological resource or site or unique geological feature** | **MM-GEO-1: Implement a Paleontological Resource Mitigation Program** | Less than Significant | **Impact-CUL-2** would be reduced to less than significant after implementation of **MM-GEO-1**, which would require paleontological and geologic resource sensitivity screening prior to commencement of construction the development and implementation of a paleontological resource mitigation program during ground-disturbing activities. |
| **Impact-CUL-3: Potential to disturb human remains, including those interred outside of formal cemeteries** | **MM-CUL-1: Prepare and Implement a Cultural Resources Monitoring and Discovery Plan.**<br>**MM-CUL-2: Prepare and Implement a Cultural Resources Awareness Training Prior to Project Construction.**<br>**MM-CUL-3: Conduct Archaeological and Native American Monitoring** | Less than Significant | **Impact-CUL-3** would be reduced to less than significant after implementation of **MM-CUL-1** through **MM-CUL-3**, which would ensure preparation and implementation of a CRMDP and Cultural Resources Awareness Training, as well as archaeological and Native American monitoring. |

# 4.6.1 Overview

This section describes the existing setting for energy and the applicable regulations that govern energy use, supply and distribution, and performance. This section also discusses the project's potential to result in impacts associated with energy use. Impacts related to energy would be significant if the project were to (1) result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation; or (2) conflict with or obstruct a ~~s~~State or local plan for renewable energy or energy efficiency.

# 4.6.2 Existing Conditions

Energy use includes direct and indirect consumption of energy, including electricity and natural gas, and fuel associated with transportation-related energy, during project construction and operation. San Diego Gas and Electric (SDG&E) provides electricity and natural gas to the project site.

## 4.6.2.1 State Energy Resources and Use

California has a diverse portfolio of energy resources that produced 2,408 trillion British thermal units (BTUs)[1] in 2018 (U.S. Energy Information Administration 2019).[2] Excluding offshore areas, the ~~s~~State ranked third in the nation in crude oil production in 2018, producing the equivalent of 965.3 trillion BTUs. The ~~s~~State also ranked first in the nation for energy production from renewable resources. Other energy sources in the ~~s~~State include natural gas (228.9 trillion BTUs), nuclear (190.4 trillion BTUs), and biofuels (30 trillion BTUs) (U.S. Energy Information Administration 2019).[3]

According to the U.S. Energy Information Administration, California consumed approximately 7,967 trillion BTUs of energy in 2018. Per capita energy consumption (i.e., total energy consumption divided by the population) in California is among the lowest in the country, with 202 million BTU in 2018, which ranked 48th among all states. Natural gas accounted for the majority of energy consumption (28%), followed by motor gasoline (22%); renewable energy, including nuclear electric power, hydroelectric power, biomass, and other renewables (17%); distillate and jet fuel (15%); and interstate electricity (11%); with the remaining 7% coming from a variety of other sources (U.S. Energy Information Administration 2019). The transportation sector consumed the

[1] One BTU is the amount of energy required to heat 1 pound of water by 1°F at sea level. BTU is a standard unit of energy that is used in the United States and is on the English system of units (foot-pound-second system).

[2] Note that 2018 data are the most recent available.

[3] No coal production occurs in California; however, imported coal made up approximately 4% of California's energy mix as of 2018. SDG&E, the energy provider for the San Diego region, does not have any coal in its energy mix as of 2018 (California Energy Commission 2021b).

highest quantity of energy (39%), followed by the industrial (24%), commercial (19%), and residential (18%) sectors (U.S. Energy Information Administration 2019).

Per capita energy consumption, in general, is declining due to improvements in energy efficiency and design. However, despite this reduction in per capita energy use, the ~~s~~State's total overall energy consumption (i.e., non-per capita energy consumption) is expected to increase over the next several decades due to overall growth in population, jobs, and vehicle travel.

### 4.6.2.2 Regional Energy Resources and Use

SDG&E provides energy service to over 3.6 million customers (i.e., 1.4 million accounts) in San Diego County and portions of southern Orange County. The utility has a diverse power production portfolio, composed of a variety of renewable and non-renewable sources. Energy production typically varies by season and by year. Regional electricity loads also tend to be higher in the summer because the higher summer temperatures drive increased demand for air-conditioning. In contrast, natural gas loads are higher in the winter because the colder temperatures drive increased demand for natural gas heating.

In 2018, which reflects the most recent year that California Renewables Portfolio Standard (RPS) data is available, over 31% of the electricity SDG&E supplied was from renewable sources, compared to less than 1% in 2002 (CPUC 2019a). Table 4.6-1 outlines the SDG&E power mix in 2019 compared to the power mix for the ~~s~~State (CEC 2021a). In 2019, SDG&E customers used 20,481 gigawatt hours of electricity and 534 million therms of natural gas (CEC 2021b). Table 4.6-2 outlines the breakdown of electricity and natural gas usage by sector in the SDG&E service area. Residential and commercial uses account for 89% of electricity use and 94% of natural gas use within the SDG&E service area.

**Table 4.6-1. SDG&E and the State of California Power Mix in 2019**

| Energy Resources | SDG&E Power Mix (percent) | California-Wide Power Mix (percent) |
|---|---|---|
| Eligible Renewables | 31 | 32 |
| Biomass and Waste | 2 | 2 |
| Geothermal | 0 | 5 |
| Small hydroelectric | 0 | 2 |
| Solar | 17 | 12 |
| Wind | 13 | 10 |
| Coal | 0 | 3 |
| Large Hydroelectric | 0 | 15 |
| Natural Gas | 24 | 34 |
| Nuclear | 0 | 9 |
| Other | 0 | 0 |
| Unspecified Sources of Power[1] | 44 | 7 |
| Total | 100 | 100 |

Source: CEC 2021a.
[1] Electricity from transactions that are not traceable to specific generation sources.

**Table 4.6-2. Electricity and Natural Consumption in the SDG&E Service Area in 2019**

| Sector | Electricity (GWh) | Natural Gas (million therms) |
|---|---|---|
| Agriculture and Water Pump | 355 | 5 |
| Commercial | 10,865 | 200 |
| Industry | 1,342 | 21 |
| Mining and Construction | 395 | 4 |
| Residential | 7,435 | 304 |
| Streetlight | 90 | -- |
| Total | 20,481 | 534 |

Source: CEC 2021b.
GWh = gigawatt hours

# 4.6.3 Applicable Laws and Regulations

## 4.6.3.1 State

### Clean Energy and Pollution Reduction Act of 2015

Senate Bill (SB) 350 (De Leon, also known as the "Clean Energy and Pollution Reduction Act of 2015") was approved by the California legislature in September 2015 and signed by Governor Brown in October 2015. Its key provisions are to require the following by 2030: (1) an RPS of 50% and (2) a doubling of efficiency for existing buildings.

### Energy Building Regulations and Energy Conservation Standards

New buildings constructed in California must comply with the standards contained in California Code of Regulations (CCR) Title 20, Energy Building Regulations, and Title 24, Energy Conservation Standards. Title 20 contains standards ranging from power plant procedures and siting to energy efficiency standards for appliances to ensuring reliable energy sources are provided and diversified through energy efficiency and renewable energy resources.

Energy Conservation Standards for new residential and nonresidential buildings were adopted by the California Energy Resources Conservation and Development Commission in June 1977 and most recently revised in 2008 (24 CCR 6). Title 24 requires the design of building shells and building components that conserve energy. The standards are updated periodically to allow for consideration and possible incorporation of new energy efficiency technologies and methods.

On July 17, 2008, the California Building Standards Commission adopted the nation's first green building standards. The California Green Building Standards Code (proposed Part 11, Title 24) was adopted as part of the California Building Standards Code (24 CCR). Part 11 establishes voluntary standards that became mandatory in the 2010 edition of the code, including planning and design for sustainable site development, energy efficiency (in excess of the California Energy Code requirements), water conservation, material conservation, and internal air contaminants.

## California Energy Code

Title 24, Part 6 of the CCR describes California's energy efficiency standards for residential and nonresidential buildings. These standards were established in 1978 in response to a legislative mandate to reduce California's energy consumption and have been updated periodically to include new energy efficiency technologies and methods. The California Energy Code requires compliance with energy efficient standards for all new construction, including new buildings, additions, alterations, and, in nonresidential buildings, repairs.

## California Energy Efficiency Standards for Residential and Nonresidential Buildings—Green Building Code (2011), Title 24 Updates (2013, 2015)

The Green Building Standards Code (CALGreen) applies to the planning, design, operation, construction, use, and occupancy of newly constructed buildings and requires the installation of energy- and water-efficient indoor infrastructure for all new projects permitted after January 1, 2011. CALGreen also requires newly constructed buildings to develop a waste management plan and divert at least 50% of the construction materials generated during project construction.

Administrative regulations to CALGreen Part 11 and the California Building Energy Efficiency Standards were adopted in 2013 and took effect on January 1, 2014. The 2013 Building Energy Efficiency Standards are 30% more efficient than previous standards for commercial construction. Part 11 also established voluntary standards that became mandatory in the 2010 edition of the code, including planning and design for sustainable site development, energy efficiency, water conservation, material conservation, and internal air contaminants.

The 2016 Building Energy Efficiency Standards were adopted in 2015 and took effect on January 1, 2017. While the 2016 standards do not require zero net energy buildings, the 2019 standards, which took effect January 1, 2020, are expected to take the final step toward achieving zero net energy for newly constructed residential buildings throughout California with requirements such as solar voltaic systems for new homes and encouraging demand responsive technologies (e.g., battery storage, heat pump water heaters, etc.) to improve energy savings. Later standards are expected to require zero net energy for newly constructed commercial buildings.

## California Renewable Resources Act and the Clean Energy and Pollution Reduction Act of 2015

SB X1-2 (also known as the "California Renewable Resources Act") was signed by Governor Brown in April 2011 and revised California's RPS to a goal of 33% by 2020. SB 350 increased the renewable procurement goal from 33% by 2020 to 50% by 2030 and also requires the ~~s~~State to double energy efficiency savings.

## Climate Change Scoping Plan of 2017

Executive Order B-30-15 and SB 32 extended the goals of AB 32 and set a 2030 goal of reducing emissions 40% from 2020 levels. The Scoping Plan established a proposed framework to implement programs to meet greenhouse gas (GHG) reduction goals.

The 2017 Scoping Plan proposes meeting the 2030 goal by accelerating the focus on zero and near-zero technologies for moving freight, continued investment in renewables, greater use of low-carbon fuels, including electricity and hydrogen, stronger efforts to reduce emissions of short-lived climate

pollutants (e.g., methane, black carbon, fluorinated gases), further efforts to create walkable communities with expanded mass transit and other alternatives to traveling by car, continuing the cap-and-trade program, and ensuring that natural lands become carbon sinks to provide additional emissions reductions and flexibility in meeting the target.

The 2017 Scoping Plan recommends that local governments aim to achieve community-wide efficiency of 6 metric tons of carbon dioxide-equivalent ($MTCO_2e$) per capita by 2030 and 2 $MTCO_2e$ per capita by 2050 to be used in local climate action planning. These efficiency targets would replace the "15% from 2008 levels by 2020" approach recommended in the initial Scoping Plan, which would allow for local governments to grow in a sustainable manner.

The 2017 Scoping Plan also emphasizes the importance of reducing vehicle miles traveled (VMT) by on-road vehicles in the ~~s~~State, with recommendations for 15% reduction in total light-duty VMT from the business-as-usual scenario in 2050. In January 2019, the California Air Resources Board (CARB) published more specific guidance about VMT in its document titled *2017 Scoping Plan–Identified VMT Reductions and Relationship to the State Climate Goals* (CARB 2019). Recognizing VMT as a proxy for mobile-source GHG emissions, this document includes information about the level of statewide VMT reduction that would promote achievement of statewide GHG emissions reduction targets. CARB found that to be consistent with the transportation assumptions embedded in the 2017 Scoping Plan and with 2050 ~~s~~State climate goals, VMT per capita would need to be approximately 14.3% lower than existing conditions, and light-duty VMT per capita would need to be approximately 16.8% lower than existing conditions.

## Senate Bill 100 (2018)

SB 100 (De Leon, also known as the "California Renewables Portfolio Standard Program: emissions of greenhouse gases") was approved by the California legislature and signed by Governor Brown in September 2018. The bill builds on SB 350 by increasing the renewable procurement target set in SB 350 to 60% by 2030 and requires 100% zero-carbon energy production and consumption by 2045.

## ~~State~~ CEQA Guidelines, Appendix F

Appendix F of the ~~State~~ CEQA Guidelines contains energy conservation measures that promote the efficient use of energy for projects. ~~In order to~~To ensure that energy impacts are considered in project decisions, CEQA requires that EIRs include a discussion of the potential energy impacts of proposed projects, with particular emphasis on avoiding or reducing inefficient, wasteful, and unnecessary consumption of energy.

The goal outlined in Appendix F of the ~~State~~ CEQA Guidelines is to conserve energy through the wise and efficient use of energy. The means of achieving this goal include the following.

- Decreasing the overall per capita energy consumption.
- Decreasing reliance on natural gas and oil.
- Increasing reliance on renewable energy sources.

# 4.6.3.2 Local

## San Diego Association of Governments

San Diego Association of Governments' (SANDAG) San Diego Forward: The Regional Plan, which incorporates the 2050 Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS), was adopted in ~~2011and~~2011 and provides a planned vision for the region's transportation system through 2050. The plan also incorporates a sustainable communities strategy as required by SB 375, which includes implementation of a Transportation Demand Management (TDM) strategy to help local governments reduce energy consumption.

SANDAG's Energy and Climate Change program supports local efforts to reduce GHG emissions in alignment with statewide goals to prepare for the impacts of climate change. Projects include climate action planning and energy engineering services for local jurisdictions, electric vehicle charging, and climate adaptation (SANDAG 2019).

Through its Energy Roadmap Program, SANDAG provides energy efficiency and engineering support to qualifying local jurisdictions (i.e., cities), which includes free energy assessments and energy management plans, or "Energy Roadmaps," to SANDAG member agencies that do not have Local Government Partnerships with SDG&E.

In July 2015, SANDAG launched Plug-in San Diego (Plug-in SD) through a 2-year California Energy Commission (CEC) grant. Plug-in SD implemented recommendations from SANDAG's Electric Vehicle (EV) Readiness Plan through a combination of resource development, training, technical assistance through an EV Expert, and outreach. SANDAG has provided various reports and documents to assist property owners in acquiring EV charging infrastructure and better understanding ~~of~~ the technologies, incentives, and installation options available.

### SANDAG Regional Energy Strategy

The Regional Energy Strategy (RES) will serve as an energy policy blueprint for the region through 2050 (SANDAG 2021). The RES establishes long-term goals in 11 topic areas, including energy efficiency, renewable energy, distributed generation, transportation fuels, land use and transportation planning, border energy issues, and the green economy. Priority early actions of the RES include the following.

1. Pursue a comprehensive building retrofit program to improve efficiency and install renewable energy systems.
2. Create financing programs to pay for projects and improvements that save energy.
3. Use the SANDAG-SDG&E Local Government Partnership to help local governments identify opportunities and implement energy savings, both at government facilities and throughout the communities.
4. Support land use and transportation planning strategies that reduce energy use and GHG emissions.
5. Support planning for electric-charging and alternative-fuel infrastructure.
6. Support the use of existing unused reclaimed water to decrease the amount of energy needed to meet the water needs of the San Diego region.

In the RES, SANDAG acknowledges the ~~s~~State's "preferred loading order" for meeting the goals pertaining to the ~~s~~State's growing electricity demand. The preferred loading order is as follows.

1. Increase energy efficiency.
2. Increase demand response (e.g., through a temporary reduction or shift in energy use during peak hours).
3. Meet generation needs with renewable and distributed generation resources.
4. Meet new generation needs with clean fossil-fueled generation and infrastructure improvements.

The RES contains a suite of goals as well as measures for achieving the goals. For example, the RES includes an energy efficiency and conservation goal for reducing per capita electricity consumption by 20% by 2030 to compensate for population growth. Other regional goals are associated with developing renewable energy, encouraging distributed generation, reducing water consumption and diversifying water sources, reducing peak demand, relying on smart energy, replacing inefficient power plants, supporting alternative fuels for transportation, and ensuring appropriate land use planning, among others. To accomplish the goals, SANDAG recommends various measures, which local jurisdictions can implement to achieve the goals of the RES, including pursuing a comprehensive building retrofit program and identifying, securing, or developing funding mechanisms to pay for energy-related projects and programs. The RES will be updated periodically to reflect progress toward the RES goals, account for changes in energy and climate change policy, and make recommendations for continued progress.

## County of San Diego General Plan

The General Plan includes goals and policies applicable to energy within the Conservation and Open Space element.

COS-6.5 Best Management Practices. Encourage best management practices in agriculture and animal operations to protect watersheds, reduce GHG emissions, conserve energy and water, and utilize alternative energy sources, including wind and solar power.

**GOAL COS-14 Sustainable Land Development.** Land use development techniques and patterns that reduce emissions of criteria pollutants and GHGs through minimized transportation and energy demands, while protecting public health and contributing to a more sustainable environment.

COS-14.3 Sustainable Development. Require design of residential subdivisions and nonresidential development through "green" and sustainable land development practices to conserve energy, water, open space, and natural resources.

COS-14.7 Alternative Energy Sources for Development Projects. Encourage development projects that use energy recovery, photovoltaic, and wind energy.

**GOAL COS-15 Sustainable Architecture and Buildings.** Building design and construction techniques that reduce emissions of criteria pollutants and GHGs, while protecting public health and contributing to a more sustainable environment.

COS-15.1 Design and Construction of New Buildings. Require that new buildings be designed and constructed in accordance with "green building" programs that incorporate techniques and

materials that maximize energy efficiency, incorporate the use of sustainable resources and recycled materials, and reduce emissions of GHGs and toxic air contaminants.

COS-15.2 Upgrade of Existing Buildings. Promote and, as appropriate, develop standards for the retrofit of existing buildings to incorporate design elements, heating and cooling, water, energy, and other elements that improve their environmental sustainability and reduce GHG.

COS-15.3 Green Building Programs. Require all new County facilities and the renovation and expansion of existing County buildings to meet identified "green building" programs that demonstrate energy efficiency, energy conservation, and renewable technologies.

COS-15.4 Title 24 Energy Standards. Require development to minimize energy impacts from new buildings in accordance with or exceeding Title 24 energy standards.

COS-15.5 Energy Efficiency Audits. Encourage energy conservation and efficiency in existing development through energy efficiency audits and adoption of energy saving measures resulting from the audits.

**GOAL COS-18 Sustainable Energy.** Energy systems that reduce consumption of non-renewable resources and reduce GHG and other air pollutant emissions while minimizing impacts to natural resources and communities.

COS-18.1 Alternate Energy Systems Design. Work with San Diego Gas and Electric and non-utility developers to facilitate the development of alternative energy systems that are located and designed to maintain the character of their setting.

## County of San Diego Climate Action Plan

The County adopted the 2018 County of San Diego Climate Action Plan (CAP) on February 14, 2018. The CAP outlined strategies and measures to reduce the ~~c~~County's contribution to GHG emissions and to meet the ~~s~~State's 2020 and 2030 emissions targets, as well as ensure progress towards the 2050 reduction goal. The CAP identifies 11 strategies and 26 measures plus numerous supporting efforts to reduce GHG emissions in the largely rural, unincorporated ~~county~~area as well as within County ~~government~~ operations (County of San Diego 2021). These strategies and measures would focus on energy efficiency, developing renewable sources of energy, improving waste recycling, and improving access to sustainable transportation. Measures relevant to energy use from the proposed County-sponsored project include the following:

- Measure T-2.3: Reduce County Employee Vehicle Miles Traveled
- Measure T-3.2: Use Alternative Fuels in County Projects
- Measure T-3.4: Reduce the County's Fleet Emissions
- Measure E-1.4: Reduce Energy Use Intensity at County Facilities
- Measure E-2.4: Increase Use of On-Site Renewable Electricity Generation for County Operations
- Measure W-1.3: Reduce Potable Water Consumption at County Facilities

On September 30, 2020, the County of San Diego Board of Supervisors voted to set aside the approval of the CAP because a portion of the Supplemental EIR was found to be out of compliance with CEQA. The County is currently preparing a CAP Update to revise the 2018 CAP and associated EIR in response to the court's direction. In accordance with the ~~State~~ CEQA Guidelines, consistency

with the 2018 CAP cannot be relied upon for determination of project-related GHG emissions impact significance until it is reapproved in compliance with CEQA.

Although the court ruling struck down part of the 2018 CAP EIR, the court did not find fault with its 26 GHG reduction measures. Therefore, while the 2018 CAP may not be used for project impact significance determination, the relevant GHG reducing measures may be used to mitigate project-specific GHG impacts (County of San Diego 2021).

# 4.6.4 Project Impact Analysis

## 4.6.4.1 Methodology

Energy impacts would occur if the project would result in the wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation. Energy impacts would also occur if the project would conflict with or obstruct a ~~s~~State or local plan for renewable energy or energy efficiency. The energy analysis for the project evaluates the following sources of energy consumption associated with existing conditions and the project.

### Energy Use During Construction

Implementation of the project would result in energy use from construction activities. Energy use associated with construction activities includes the consumption of transportation fuels (i.e., gasoline and diesel) for equipment use and employee, delivery, and haul truck vehicle travel. Diesel fuel would be required for operation of heavy-duty off-road construction equipment (e.g., cranes, forklifts, loaders) that would be used for a variety of activities, including construction of buildings and infrastructure; and grading and laying foundations. It was assumed that all off-road equipment used at the project site would be diesel-powered. Both diesel and gasoline fuel would also be required for the operation of on-road vehicles (e.g., pickup trucks, flatbed trucks, passenger cars) that would be used for material and equipment hauling, crew and material movement, employee commuting, and material disposal.

Energy use during construction was estimated using a combination of methods and energy factors from published best available documentation. Energy usage associated with fuel consumption was calculated using fuel consumption factors and activity data for offroad equipment and employee, delivery, and hauling vehicles. Construction energy consumption is consistent with the activity data and assumptions used in the air quality and GHG analyses for the project.

- **Off-Road Equipment:** Fuel consumption for diesel-powered off-road equipment was estimated using the equipment's total horsepower-hours (hp-hr) over the construction duration. Total hp-hr for equipment was estimated using the number of equipment, daily usage (hours per day), equipment size (horsepower), load factor (unitless), and total workdays. Brake specific fuel consumption (BSFC) factors with units of pounds per horsepower-hour (lb/hp-hr) for off-road construction equipment were obtained from CARB's *2017 Off-Road Diesel Engine Emission Factors* (CARB 2017). For equipment less than 100 hp, the BSFC was 0.408 lb/hp-hr and 0.367 lb/hp-hr for equipment greater than or equal to 100 hp. To convert the BSFC into units of gallons per horsepower-hour (gal/hp-hr), the BSFC was divided by the density of diesel fuel, which is 7.11 pounds per gallon (lb/gal) (CARB 2017). Total fuel consumption was estimated by

multiplying the total hp-hr by the appropriate BSFC for equipment less than 100 hp and equipment greater than or equal to 100 hp. Detailed calculations are provided in Appendix C.

- **On-Road Vehicles:** Fuel consumption for employee vehicles, delivery trucks, and hauling trucks were based on the total miles traveled during construction, total idling hours, and fuel consumption factors in gallons per mile (gal/mile) for on-road travel and gallons per hour (gal/hr) for truck idling. It was assumed that employee vehicles were primarily gasoline-powered, and vendor and haul trucks were primarily diesel-powered. Fuel consumption factors were generated from CARB's EMission FACtor model (EMFAC). Fuel consumption factors for haul trucks are based on EMFAC's heavy-heavy duty truck (HHDT) vehicle category. The HHDT category had a fuel consumption factor of 0.18 gal/mile. Fuel consumption factors for water and vendor trucks are based on a weighted average of EMFAC's HHDT and medium heavy-duty ~~truck~~s (MHDT) vehicle categories with a fleet mix consisting of 50% MHDT and 50% HHDT. The MHDT and HHDT categories had a weighted fuel consumption factor of 0.16 gal/mi. Fuel consumption factors for employee commute vehicles are based on a weighted average of EMFAC's light-duty automobile/light-duty truck vehicle categories (LDA, LDT1, and LDT2).[4] The employee commute vehicles consisted of a fleet mix of 50% LDA, 25% LDT1, and 25% LDT2. The weighted fuel consumption factor for employee vehicles was 0.04 gal/mile. For idling events, it was assumed that each delivery and haul truck would idle for five minutes per trip. Idling fuel consumption factors were obtained from the Department of Energy (Department of Energy 2015). Detailed calculations are provided in Appendix C.

### Energy Use During Operation

Operation of the project would also result in the consumption of transportation fuels (diesel and gasoline) from park visitors traveling to and from the project site, as well as electricity during operation of project components such as the Administration building, restroom facilities, multi-purpose room, volunteer pad, and security lighting. The project would not consume natural gas. During operation, solar panels that would be installed on site would produce energy for use on the project site. Annual electricity consumption from the project's components were estimated using CalEEMod. Annual transportation fuel consumption was based on the project's annual VMT and weighted gasoline- and diesel-fuel consumption factors for all vehicle category types in EMFAC. Operations energy consumption is consistent with the activity data and assumptions used in the air quality and GHG analyses for the project (see Sections 4.3 and 4.8, respectively). Detailed calculations are provided in Appendix C.

## 4.6.4.2 Thresholds of Significance

### Appendix G of the ~~State~~ CEQA Guidelines

The following significance criteria are based on Appendix G of the ~~State~~ CEQA Guidelines and provide the basis for determining the significance of impacts associated with the demand placed on, and expansions associated with, energy use resulting from the implementation of the project. The determination of whether an energy use impact would be significant is based on the professional

[4] LDA = Passenger Cars, LDT1 = light-duty trucks with equivalent weight test of less than or equal to 3,750 pounds, LDT2 = Light-duty trucks with equivalent weight test of 3,751 to 5,750 pounds.

judgment of ~~the~~ County DPR as Lead Agency, supported by the evidence in the administrative record.

Impacts are considered significant if the project would result in any of the following:

1. Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.
2. Conflict with or obstruct a ~~s~~State or local plan for renewable energy or energy efficiency.

Appendix F of the ~~State~~ CEQA Guidelines is an advisory document that assists EIR preparers in determining whether a project will result in the inefficient, wasteful, and unnecessary consumption of energy. The analysis under Threshold 1 ~~(see below)~~ relies on Appendix F of the ~~State~~ CEQA Guidelines, which includes the following criteria to determine whether this threshold of significance is met:

- Criterion 1: The project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project including construction, operation, maintenance and/or removal. If appropriate, the energy intensiveness of materials may be discussed.
- Criterion 2: The effects of the project on local and regional energy supplies and on requirements for additional capacity.
- Criterion 3: The effects of the project on peak and base period demands for electricity and other forms of energy.
- Criterion 4: The degree to which the project complies with existing energy standards.
- Criterion 5: The effects of the project on energy resources.
- Criterion 6: The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.

## County of San Diego Guidelines for Determining Significance

The County ~~of San Diego~~ does not have specific guidelines for determining significance for energy impacts.

The ~~State~~ CEQA Guidelines do not indicate an amount of energy use that constitutes a significant impact on the environment. Instead, they authorize the lead agency to consider thresholds of significance previously adopted or recommended by other public agencies or recommended by experts, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence (~~State~~ CEQA Guidelines Sections 15064.4(a) and 15064.7(c)).

As described in Section 4.8, *Greenhouse Gas Emissions and Climate Change*, in the absence of an adopted numerical threshold for the project region, the significance of the project-related GHG emissions can be determined by evaluating the project's compliance with regulations or requirements adopted to implement statewide, regional, or local plans for the reduction or mitigation of GHG emissions. Statewide, regional, or local plans for the reduction or mitigation of GHG emissions are applicable to energy impacts as GHG emission reduction measures can also reduce energy consumption. The ~~s~~State's 2030 target (reduce GHG emissions to 40% below 1990 levels by 2030) has been codified in law through SB 32, and the 2017 Scoping Plan (CARB 2017). Therefore, 2030 marks the next statutory statewide milestone target applicable to the project.

The County's 2018 CAP quantified baseline and projected future GHG emissions from activities within the ~~county~~unincorporated area (where the project is located), and proposed County-specific measures and strategies to reduce GHG emissions in accordance with the 2030 statewide GHG reduction target adopted in SB 32. However, as previously discussed under Section 4.6.3.2, *Local,* given the County of San Diego Board of Supervisors' vote to rescind the 2018 CAP, it is no longer a "CEQA-qualified" document as defined by Sections 15183.5(b) and 15064.4 of the ~~State~~ CEQA Guidelines and cannot be used to determine significance of project-related energy impacts.

In this case, significance of impacts related to project-generated energy use can be determined through an assessment of compliance with statewide regulations and requirements adopted to implement plans that align with the SB 32 2030 target, such as CARB's 2017 Scoping Plan. The specific threshold approach used to assess the significance of the project's energy impacts is informed by the guidance summarized here and is discussed in further detail in the following section.

# 4.6.4.3 Project Impacts and Mitigation Measures

***Threshold 1: Implementation of the project would not result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.***

## County Park and Trails

### Impact Discussion

#### Construction

Project construction would require energy in the form of gasoline and diesel fuel for transportation of employees and haul trucks to and from the project site, and diesel fuel for operation of off-road equipment. Table 4.6-3 outlines the construction energy use by source. The project's construction diesel and gasoline fuel consumption would increase the County's consumption by 0.038% and 0.0004%, respectively (CEQA Appendix F - Criterion 1).

**Table 4.6-3. Project and San Diego County Energy Consumption During Construction**

| Energy Type | Project Annual Energy Consumption | San Diego County Annual Energy Consumption | Percentage of Countywide |
|---|---|---|---|
| Diesel Consumption | 87,956 gallons | 229,166,667 gallons | 0.038% |
| Gasoline Consumption | 5,509 gallons | 1,325,000,000 gallons | 0.0004% |

Source: CEC 2021c.
Note: Diesel is adjusted to account for retail (48%) and non-retail (52%) diesel sales.

The majority of energy use during construction would be attributed to the use of diesel-powered construction equipment, followed by the use of diesel-powered trucks for material hauling and vendor trips. Fossil fuels for construction vehicles and other energy-consuming equipment would be used during grading and construction of project components within the proposed active park. Construction equipment would be required to comply with the latest U.S. Environmental Protection Agency (EPA) and CARB engine emissions standards. These emissions standards require highly

efficient combustion systems that maximize fuel efficiency and reduce unnecessary fuel consumption (CEQA Appendix F - Criterion 4). As indicated in Table 4.6-3, the average diesel fuel consumption during project construction would be 87,956 gallons per year and result in a nominal increase (0.038%) in fuel use. As such, project construction would have a minimal effect on the local and regional energy supplies and would not require additional capacity (CEQA Appendix F - Criterion 2).

Energy use associated with construction of the project would be temporary and would cease upon completion of construction activities. Therefore, fuel energy and construction materials consumed during construction would not represent a significant demand on energy resources (CEQA Appendix F - Criterion 5).

As shown, total energy consumed during the construction period represents a small demand on local and regional energy supplies.

### Operation

Operation of the project that would involve the use of energy resources include park ranger/volunteer and visitor vehicle trips, and utility-related consumption (e.g., electricity, water consumption, wastewater and solid waste generation). Once operational, the project would require more energy than currently required at the project site under existing conditions. As shown in Table 4.6-4, annual project operation is estimated to require 0.29 gigawatt hour (GWh) of energy. Operational energy consumption of the project would represent an approximately 0.002% increase in electricity consumption over the current countywide usage, which would be a minimal increase compared to San Diego County's annual consumption. Energy requirements for gasoline would ~~be reduced~~go down over time due to improved motor vehicle fuel economy standards. The project includes the operation of an active park that would not result in unique or more intensive peak or base period electricity demand (CEQA Appendix F - Criterion 2 and Criterion 3).

**Table 4.6-4. Estimated San Diego County Energy Consumption During Operation**

| Energy Type | Project Annual Energy Consumption[1] | San Diego County Annual Energy Consumption[2] | Percentage of Countywide |
|---|---|---|---|
| Electricity Consumption | 0.29 GWh | 17,880 GWh | 0.002% |
| Diesel Fuel Consumption | 5,982 gallons | 229,166,667 gallons | 0.003% |
| Gasoline Consumption | 42,038 gallons | 1,325,000,000 gallons | 0.003% |

[1] Trip data provided in the Transportation Impact Study (TIS) prepared for the project (Chen Ryan 2020).
[2] SDG&E 2019 Electricity Sales.

The project would be required to comply with the 2019 Title 24 Building Energy Efficiency Standards, which ~~prescribe~~provide minimum efficiency standards related to various structure features. Implementation of the 2019 Title 24 standards significantly reduces energy usage (30% compared to the 2016 standards). The Title 24 Building Energy Efficiency Standards are updated every 3 years and become more stringent between each update; therefore, complying with the latest 2019 Title 24 standards would make the project more energy efficient than existing facilities built under the earlier versions of the Title 24 standards (CEQA Appendix F - Criterion 4).

Furthermore, the electricity provider, SDG&E, is subject to California's RPS, which requires investor-owned utilities, electric service providers, and community choice aggregators to increase procurement from eligible renewable energy resources to 60% of total procurement by 2030 and to

100% of total procurement by 2045. Renewable energy is generally defined as energy that comes from resources which are naturally replenished within a human timescale such as sunlight, wind, tides, waves, and geothermal heat. The increase in reliance of such energy resources further ensures that the project would not result in the waste of the finite energy resources (CEQA Appendix F - Criterion 5).

As shown in Table 4.6-4, project operations are estimated to consume approximately 42,038 gallons of gasoline fuel per year, which would increase countywide automotive fuel consumption by 0.003%. Visitors using gasoline to travel to and from the project would require energy use associated with transportation. Energy requirements for fuel use associated with vehicles used for maintenance would ~~be reduced~~go down over time due to improved motor vehicle fuel economy standards. The project does not include any features that would result in excessive long-term operational fuel consumption (CEQA Appendix F - Criterion 6). Therefore, fuel consumption associated with vehicle trips generated by the project would not be considered inefficient, wasteful, or unnecessary.

Total energy consumed during operation represents a small demand on local and regional energy supplies.

### Impact Determination

The project would not result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation. Impacts would be less than significant.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

Impacts would be less than significant.

## Open Space~~/Preserve~~

### Impact Discussion

No construction activities would occur as a result of the open space~~/preserve~~ component of the project. During operation, the current undeveloped area would remain similar to existing conditions.

### Impact Determination

The open space~~/preserve~~ component would not result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction. No impact would occur.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

No impact would occur.

***Threshold 2: The project would not conflict with or obstruct a ~~s~~State or local plan for renewable energy or energy efficiency.***

## County Park and Trails and Open Space~~/Preserve~~

### Impact Discussion

State and local renewable energy and energy efficiency plans that are applicable to the project are discussed in Section 4.6.3, *Applicable Laws and Regulations.* State plans, California Title 24 energy efficiency standards, SB 350, and SB 100 contain required standards related to energy efficiency and renewable energy development. The project is required to comply with the ~~s~~State and local plans and regulations, all of which are aimed at increasing energy efficiency and renewable energy development. Some plans and regulations are statewide and do not require local or project action to implement. Table 4.6-5 provides a consistency analysis with ~~s~~State and local energy plans and regulations.

**Table 4.6-5. Project Consistency with State and Local Energy Plans and Regulations**

| Regulation, Plan, or Policy | Project Applicability and Consistency |
|---|---|
| **Clean Energy and Pollution Reduction Act of 2015** (SB 350) | **Consistent.** The Clean Energy and Pollution Reduction Act of 2015 requires the following by 2030: (1) an RPS of 50% and (2) a doubling of efficiency for existing buildings. The RPS is dependent on the utility provider and the project does not impede reaching a goal of 50%. |
| **Energy Building Regulations and Energy Conservation Standards** (Title 20, Energy Building Regulations; Title 24, Energy Conservation Standards) | **Consistent.** The project would result in the construction of energy efficient buildings that would comply with existing building codes. At a minimum, new construction occurring under the project would be required to comply with the current Title 24 building standards, which include a broad set of requirements for energy conservation and green design. Given that this is a ~~s~~State regulation, the project is required to comply, and would therefore be consistent. |
| **Senate Bill 100** | **Consistent.** SB 100 increases the RPS target set in SB 350 to 60% by 2030. It also requires all retail sales of electricity to California end-users and electricity procured to serve ~~s~~State agencies to be provided by zero-carbon resources by 2045. Building energy efficiency is expected to increase as a result of compliance with Title 24 building codes, which are expected to move toward zero net energy for newly constructed buildings. The project is required to comply with these standards, and therefore would not hinder implementation of SB 100. |
| **CARB's 2017 Scoping Plan** | **Consistent.** Many of the programs included in the 2017 Scoping Plan would result in the reduction of project-related energy use with no action required at the project level. These programs include SB 350, Low-Carbon Fuel Standard, and the Mobile Source Strategy. These programs would |

| Regulation, Plan, or Policy | Project Applicability and Consistency |
|---|---|
| | benefit GHG emission reductions through increased energy efficiency and renewable energy production, reduction in carbon intensity of transportation fuels, and the accelerated efficiency and electrification of the statewide vehicle fleet, respectively. Implementation of these statewide programs would result in a reduction of operational GHG emissions over the 30-year project lifetime. Because reducing energy use is one of the overarching strategies of the 2017 Scoping Plan, operation of the project would not conflict with this plan. |
| **SB 375 and SANDAG's San Diego Forward: The Regional Plan** | **Consistent.** SANDAG's Regional Plan established a long-range blueprint for the San Diego region's growth and development through the year 2050. Because the project would not include any components that would result in population growth, unplanned or otherwise, it would be consistent with the 2050 RTP. |
| **SANDAG Regional Energy Strategy** | **Consistent.** SANDAG's RES established long-term goals related to energy efficiency, renewable energy, distributed generation, and transportation fuel, among others. The strategies and goals found in the RES were used as guidance for development of the energy components of the 2050 RTP/SCS. Solar panels would be installed in the project's parking lot, which would be used to power outdoor lighting on site. These components support strategies that reduce energy use and GHG emissions. |
| **County of San Diego General Plan** (Policy COS-6.5, Policy COS-14.3, Policy COS-14.7, Policy COS-15.1 through COS-15.5, and Policy COS-18.1). | **Consistent.** The County of San Diego's General Plan includes policies from the Conservation and Open Space Element designed to reduce impacts related to energy. Energy efficiency policies such as Policy COS-15.1, which requir~~se~~s that new buildings be designed and constructed in accordance with "green building" programs that incorporate techniques and materials that maximize energy efficiency, incorporate the use of sustainable resources and recycled materials; Policy COS-15.3, which requires all new County facilities and the renovation and expansion of existing County buildings to meet identified "green building" programs that demonstrate energy efficiency, energy conservation, and renewable technologies; and Policy COS-18.1, which is consistent with the California Public Utilit~~y~~ies Commission's (CPUC) California Long Term Energy Efficiency Strategic Plan, strive to achieve zero net energy use for new development by 2030. The project would be consistent with these policies. |

As shown in Table 4.6-5, the project would be consistent with statewide and local renewable energy or energy efficiency plans and regulations.

## Impact Determination

Impacts would be less than significant.

### Mitigation Measures

No mitigation is required.

## 4.6.5 Summary of Significant Impacts

There would be no significant impacts related to energy.

Section 4.7
# Geology and Soils

## 4.7.1 Overview

This section describes the existing conditions and applicable laws and regulations ~~regarding~~for geology and soils. It then analyzes the project's potential to exceed the thresholds of significance for impacts associated with geotechnical hazards and soil conditions (such as soil erosion of damage to paleontological resources).

## 4.7.2 Existing Conditions

The following discussion describes the existing geologic conditions and related ~~potential~~ hazards in the project site and vicinity. It first identifies the area's geology, followed by groundwater characteristics, faulting, seismicity, and paleontological conditions. Data is sourced from the Ninyo & Moore *Geotechnical Evaluation* performed for the project, dated December 30, 2020 (Appendix F); United States Geological Survey (USGS) data; United States Department of Agriculture (USDA) Web Soil Survey data; a San Diego Natural History Museum Paleontological Records Search, from May 25, 2021; and other web-accessible public resources as referenced throughout.

### 4.7.2.1 Geology and Subsurface Conditions

#### Regional Geology

~~As stated in~~Based on the findings of the *Geotechnical Evaluation,* the project ~~site~~ is situated in the coastal foothill section of the Peninsular Ranges Geomorphic Province. This geomorphic province encompasses an area that extends approximately 900 miles from the Transverse Ranges and the Los Angeles Basin south to the southern tip of Baja California. The province varies in width from approximately 30 to 100 miles. In general, the province consists of rugged mountains underlain by Jurassic metavolcanic and metasedimentary rocks, and Cretaceous igneous rocks of the Southern California batholith. The portion of the province in San Diego County that includes the project area consists generally of Cretaceous-age sedimentary and granitic rock.

The Peninsular Ranges Province is traversed by a group of sub-parallel faults and fault zones trending approximately northwest. Several of these faults are considered active (Jennings, 2010). The Elsinore, San Jacinto, and San Andreas faults are active fault systems located northeast of the project area, and the Rose Canyon, Coronado Bank, San Diego Trough, and San Clemente faults are active faults to the west of the project area. The Elsinore fault zone is the nearest active fault system and has been mapped approximately 21 miles east of the project site. Major tectonic activity associated with these and other faults within this regional tectonic framework consists primarily of right-lateral, strike-slip movement. Further discussion of faulting relative to the site is provided under Section 4.7.2.2, *Faults and Seismicity*.

### Local Geologic Setting

~~As stated in~~Based on the findings of the *Geotechnical Evaluation,* topsoil is present on the project site from the ground surface to depths of approximately 3.8 feet. Underlying the topsoil is decomposed granitic rock, observed in varying degrees of weathering with the rock being less weathered with depth. Unweathered granitic rock corestones were encountered underlying topsoil, and boulders were observed in the surface at numerous locations within the site. The subsurface unit mapped on the project site is Cretaceous-age Lusardi Formation. The Lusardi Formation generally consists of cobble and boulder conglomerate with thin lenses of sandstone.

### Groundwater

Groundwater was not encountered during ~~the~~Ninyo & Moore's site evaluation, which included test pits of depths up to 7.2 feet. However, perched groundwater or groundwater seepage may be encountered between the contact of topsoil and granitic rock or within fractures in the granitic rock. Fluctuations in groundwater typically occur due to variations in precipitation, ground surface topography, subsurface stratification, irrigation, groundwater pumping, flooding, and other factors.

## 4.7.2.2 Faults and Seismicity

### Regional

The numerous faults in Southern California include active, potentially active, and inactive faults. As defined by the California Geological Survey (CGS), active faults are faults that have ruptured within Holocene time, or within approximately the last 11,000 years. Potentially active faults are those that show evidence of movement during Quaternary time (approximately the last 1.6 million years), but for which evidence of Holocene movement has not been established. Inactive faults have not ruptured in the last approximately 1.6 million years.

### Onsite Faulting and Ground Surface Rupture

The site is located in a seismically active area, as is the majority of Southern California, and the potential for strong ground motion is ~~therefore~~ considered significant during the design life of the proposed structures. State of California Earthquake Fault Zones (formerly known as "Alquist-Priolo Special Studies Zones") are regulatory zones delineated by the State Geologist based on Holocene-active faults that may be associated with surface fault rupture (CGS 2018). Holocene-active faults have had surface displacement within Holocene time (the last 11,700 years), while pre-Holocene faults had past surface movement older than 11,700 years and thus are not determined to meet the criteria for a Holocene-active fault. Surface fault rupture is the result of the movement of a fault that breaks the ground surface either during sudden earthquakes, or due to the slow process of "fault creep~~.~~". Surface fault rupture can result in hazards to structures, infrastructure, and users due to damage or collapse. The Earthquake Fault Zones are depicted on the Earthquake Fault Zone Map published using geographic information system (GIS) by CGS (2018). Based on the Ninyo & Moore review of the referenced geologic maps and site reconnaissance, no faults are mapped as underlying the project site. Additionally, the site is not located within a State of California Earthquake Fault Zone.

### Liquefaction, Lateral Spreading, and/or Seismically Induced Settlement

Liquefaction is the phenomenon in which loosely deposited granular soils with silt and clay contents of less than approximately 35% and non-plastic silts located below the water table undergo rapid loss of shear strength when subjected to strong earthquake-induced ground shaking. Ground shaking of sufficient duration results in the loss of grain-to-grain contact due to a rapid rise in pore water pressure, and causes the soil to behave as a fluid for a short period of time. Liquefaction is known generally to occur in saturated or near-saturated cohesionless soils at depths shallower than 60 feet below the ground surface. Factors known to influence liquefaction potential include composition and thickness of soil layers, grain size, relative density, groundwater level, degree of saturation, and both intensity and duration of ground shaking. Based on data from the San Diego Geographical Information System (SanGIS)/San Diego Association of Governments (SANDAG) GIS Data Warehouse, there are no potential liquefaction areas ~~within~~on the project site. Furthermore, according to the findings of the Ninyo & Moore evaluation, due to the dense nature of the underlying granitic rock at the site, liquefaction is not a design consideration.

### Landslides

Landslides can be caused by ground shaking from an earthquake or surface water flow from rainfall, septic systems, landscaping, or other origins that infiltrate slopes with unstable material. The potential for a landslide to occur depends on an area's geologic formations, topography, ground shaking potential, and surface development or improvements. Based on the County of San Diego General Plan EIR (2007a), the project site is not located within a landslide susceptibility area. Furthermore Ninyo & Moore's evaluation noted that landslides or indications of deep-seated landsliding are not underlying the project site. Therefore, the potential for significant large-scale slope instability at the site is not a design consideration.

## 4.7.2.3 Soil Setting

Expansive soils generally result from specific clay minerals that have the capacity to shrink or swell in response to changes in moisture content. Shrinking or swelling of foundation soils can lead to damage to foundations and engineered structures, including tilting and cracking. According to the Soil Survey of San Diego County, the soils underlaying the project site are identified as Bosanko stony clay, 5 to 9% slopes. Bosanko stony clay is categorized has having "high" shrink-swell behavior by the Soil Survey for the San Diego Area, prepared by the U.S. Department of Agriculture, Soil Conservation and Forest Service dated December 1973. This categorization indicates the project site is located on expansive soils. Concurrently, the Ninyo & Moore evaluation included laboratory testing of the topsoil, which determined it possesses a medium to high potential for expansion. In addition, Bosanko stony clay is considered to have moderate erodibility (USDA 1973). The Ninyo & Moore evaluation also identified the onsite soils as being susceptible to erosion.

## 4.7.2.4 Paleontological Setting

Paleontological resources (fossils) are the remains and/or traces of prehistoric life and represent an important and nonrenewable natural resource. Fossil remains are found in the geologic units (i.e., formations) within which they were originally buried. Fossils or fossil deposits are generally regarded as ~~being~~ older than 11,700 years,~~ which is~~ the generally accepted temporal boundary

marking the end of the last late-Pleistocene glacial event and the beginning of the current period of climatic amelioration of the Holocene.

A geologic formation is a body of rock identified by its lithic characteristics (e.g., grain size, texture, color, mineral content) and stratigraphic position. Formations are mappable at the Earth's surface or traceable in the subsurface and are formally named and described in the geologic literature. The fossil content may also be a characteristic of a formation. There is a direct relationship between fossils and the geologic formations within which they are enclosed; therefore, with sufficient knowledge of the geology and stratigraphy of a particular area and the paleontological resource potential, it is possible to reasonably predict where fossils might or might not be found. This is the case in San Diego County where a general overview of the geologic setting provides a basis for reasonably predicting the location of paleontological resources.

A unique paleontological resource is any fossil or assemblage of fossils, or paleontological resource site~~,~~ or formation that meets any one of the following criteria (County of San Diego 2009):

- The best example of its kind locally or regionally.
- Illustrates a paleontological or evolutionary principle (e.g., faunal succession; plant or animal relationships).
- Provides a critical piece of paleobiological data (illustrates a portion of geologic history or provides evolutionary, paleoclimatic, paleoecological, paleoenvironmental, or biochronological data).
- Encompasses any part of a "type locality" of a fossil or formation.
- Contains a unique or particularly unusual assemblage of fossils.
- Occupies a unique position stratigraphically within a formation.
- Occupies a unique position, proximally, distally or laterally within a formation's extent or distribution.

A paleontological record search was conducted by the San Diego Natural History Museum (SDNHM) on May 25, 2021 (SDNHM 2021) to determine the geologic units underlying each planning district and to identify any recorded fossil collection localities at or in the vicinity of each planning district. The results of the record search indicate that the project site is underlain by several geologic units including Cretaceous-age Lusardi Formation, Cretaceous-age intrusive igneous rocks, and Mesozoic-age metavolcanic and metasedimentary rocks. The Cretaceous-age Lusardi Formation underlies the southern and western portions of the project site and portions of the potential new sewer line along South Grade Road in the vicinity of Calle de Compadres, and along Tavern Road in the vicinity of Joan MacQueen Middle School. The Lusardi Formation is assigned a moderate paleontological sensitivity based on its sedimentary origin, late Cretaceous age, and limited fossil record.

Cretaceous-age intrusive igneous rocks underlie the northern portion of the project site and the majority of the potential sewer line. These rocks comprise part of the northern end of the Peninsular Ranges Batholith. Plutonic igneous rocks do not preserve fossils because they crystallize at extremely high temperatures and pressures several miles below the Earth's surface. Consequently, these rocks are assigned no paleontological sensitivity.

Based on the SDNHM record search, crystalline basement rocks of Jurassic to Cretaceous age (possibly 150 to 130 million years old), mapped as undifferentiated metavolcanic and

metasedimentary rocks by Todd (2004), underlie a portion of the potential sewer line along South Grade Road, in the vicinity of Big Wagon Road and Deland Drive. The metavolcanic portions of this unit rarely preserve fossils due to the high temperatures associated with their formation, although some of the volcanic breccias have produced petrified wood. The metasedimentary portions have the potential to yield fossils, including siliceous microfossils (e.g., radiolarians) and marine macroinvertebrates (e.g., clams and belemnites). The lack of nearby localities from these deposits indicates that fossil recovery is unlikely, so the geologic unit as a whole is assigned a low paleontological sensitivity in the vicinity of the project site**.**

The SDNHM paleontological collection records search did not find any recorded fossil localities within 1 mile of the project site.

# 4.7.3 Applicable Laws and Regulations

## 4.7.3.1 Federal

### Occupational Safety and Health Act of 1970

The Occupational Safety and Health Act establishes the framework for safe and healthful working conditions for working men and women by authorizing enforcement of the standards developed under the act. The act assigns the Occupational Safety and Health Administration (OSHA) two regulatory functions: setting standards and conducting inspections to ensure that employers are providing safe and healthful workplaces. OSHA standards may require that employers adopt certain practices, means, methods, or processes reasonably necessary and appropriate to protect workers on the job. Employers must become familiar with the standards applicable to their establishments and eliminate hazards.

Compliance with standards may include implementing engineering controls to limit exposures to physical hazards and toxic substances, implementing administrative controls, and ensuring that employees have been provided with, have been effectively trained on, and use personal protective equipment when required for safety and health, where the former controls cannot be feasibly implemented. Employees must comply with all rules and regulations that apply to their own actions and conduct. Even in areas where OSHA has not set forth a standard addressing a specific hazard, employers are responsible for complying with the act's "general duty" clause. The general duty clause (Section 5(a)(1)) states that each employer "shall furnish…a place of employment which is free from recognized hazards that are causing or are likely to cause death or serious physical harm to his employees."

Regulations defining safe standards have been developed for general industry, construction, maritime, recordkeeping, and agriculture. OSHA standards specific to safety and health regulations pertaining to construction are listed in 29 Code of Federal Regulations (CFR) 1926, Subtitle B. Specifically, subpart C handles general safety and health provisions including safety training and education, first aid and medical attention, fire protection and prevention, and personal protective equipment. Subpart D is specific to occupational health and environmental controls such as radiation, gases/vapors/fumes/dust, lead, hazardous chemicals, and noise exposure. Subpart P handles excavation work and safety. Subparts Q and R handle concrete/masonry and steel structures, respectively. In addition, several more subparts provide additional requirements.

# 4.7.3.2 State

## Alquist-Priolo Earthquake Fault Zoning Act

California's Alquist-Priolo Act (Public Resources Code [PRC] 2621 et seq.) was enacted by the State of California in 1972.[1] The Alquist-Priolo Act's primary purpose is to prohibit the construction of structures intended for human occupancy across the traces of active faults and strictly regulates construction in the corridors along active faults. It also defines criteria for identifying active faults, giving legal weight to terms such as "active," and establishes a process for reviewing building proposals in and adjacent to active faults. In addition, the Alquist-Priolo Act requires the State Geologist to establish regulatory zones, known as "earthquake fault zones," around the surface traces of active faults and to issue appropriate maps to assist cities and counties in planning, zoning, and building regulation functions. Maps are distributed to all affected cities and counties for the controlling of new or renewed construction and are required to sufficiently define potential surface rupture or "fault creep.". The State Geologist is charged with continually reviewing new geologic and seismic data and revising existing zones and delineating additional earthquake fault zones when warranted by new information. According to the Alquist-Priolo Act, before a project can be permitted, cities and counties shall require a geologic investigation, prepared by a licensed geologist, to demonstrate that buildings will not be constructed across active faults. If an active fault is found, a structure for human occupancy cannot be placed over the trace of the fault and must be set back. Although setback distances may vary, a minimum 50-foot setback is required.

Under the Alquist-Priolo Act, faults are zoned, and construction along or across them is strictly regulated if the faults are considered "sufficiently active" and "well-defined." A fault is considered sufficiently active if one or more of its segments or strands shows evidence of surface displacement during Holocene time (defined for the purposes of the act as within the last 11,000 years). A fault is considered well-defined if its trace can be clearly identified by a trained geologist at the ground surface or in the shallow subsurface, using standard professional techniques, criteria, and judgment.

## International Building Codes

Development and building design standards, implemented through the California Building Code (CBC), require the project to comply with appropriate seismic design criteria in the International Building Code, adequate drainage facility design, and preconstruction soils and grading studies. Seismic design standards have been established to reduce many of the structural problems occurring because of major earthquakes. In 1998, the code was revised as follows.

- Upgrade the level of ground motion used in the seismic design of buildings.
- Add site amplification factors based on local soils conditions.
- Improve the way ground motion is applied in detailed design.

## California Building Code

The California Code of Regulations, Title 24 (California Building Code or CBC) applies to all applications for building permits. The CBC (also called the California Building Standards Code) has incorporated the International Building Code, which was first enacted by the International

[1] The act was originally titled the Alquist-Priolo Geologic Hazards Zone Act.

Conference of Building Officials in 1927 and has been updated approximately every 3 years since that time. The current version of the CBC (2019) became effective on January 1, 2020. Building codes provide minimum standards regulating a number of aspects of construction that are relevant to geology and geologic hazards. Title 24, Part 2 of the CBC provides building codes and standards for the design and construction of structures in California. The CBC requires, among other things, seismically resistant construction and foundations~~,~~ and soil investigations prior to construction. The CBC also establishes grading requirements that apply to excavation and fill activities, and requires the implementation of erosion control measures.

The purpose of the CBC is to establish minimum standards to safeguard the public health, safety, and general welfare through structural strength, means of egress, and general stability by regulating and controlling the design, construction, quality of materials, use and occupancy, location, and maintenance of all building and structures within its jurisdiction. In addition, the CBC contains necessary California amendments, which are based on the American Society of Civil Engineers (ASCE) Minimum Design Standards 7-05. ASCE 7-05 provides requirements for general structural design and includes means for determining earthquake loads as well as other loads (flood, wind, etc.) for inclusion into building codes. The provisions of the CBC apply to the construction, alteration, movement, replacement, and~~/or~~ demolition of every building or structure or any appurtenances connected or attached to such buildings or structures throughout California.

The earthquake design requirements of the CBC take into account the occupancy category of the structure, site class, soil classifications, and various seismic coefficients, which are used to determine a Seismic Design Category (SDC) for a project. The SDC is a classification system that combines the occupancy categories with the level of expected ground motions at the site and ranges from SDC A (very small seismic vulnerability) to SDC E/F (very high seismic vulnerability and near a major fault). Design specifications are then determined according to the SDC. The project would be required to comply with the CBC, including Part 2, Volume 2, Chapter 18, Soils and Foundations, which outlines the minimum standards for structural design and construction. This includes the preparation of geotechnical evaluations, which among other requirements, include a record of the soil profile, regulation of active faults in the area, recommendations for foundation type and design criteria that address issues, as applicable, such as (but not limited to) bearing capacity of soils, provisions to mitigate the effects of expansive soils, liquefaction, settlement, and varying soil strength. Section 1803.1.1.3 of Chapter 18 states that if a building department, or other appropriate enforcement agency, determines that recommended action(s) presented in the geotechnical evaluations are likely to prevent structural damage, the approved recommended action(s) must be made a condition to the building permit (Section 1803.1.1.3 of Chapter 18).

The CBC also provides standards for various aspects of construction, including but not limited to excavation, grading, and earthwork construction; preparation of the site prior to fill placement, specification ~~of~~on fill materials and fill compaction and field testing; retaining wall design and construction; foundation design and construction; and seismic requirements. It includes provisions to address issues such as (but not limited to) construction on expansive soils, liquefaction potential, and soil strength loss. The CBC sets seismic design requirements based on seismic risk categories, which are associated with a structure's occupancy category (i.e., structures that represent low hazard to human life, structures that represent substantial hazard to human life, structures designated as essential facilities based on the proposed use), and a structure's seismic risk category (i.e., the severity of the design earthquake ground motion and specific soil properties at the site). In accordance with California law, project design and construction would be required to comply with

provisions of the CBC. Local agencies must ensure that development in their jurisdictions complies with guidelines contained in the CBC. Cities and counties can, however, adopt building standards beyond those provided in the code.

## Seismic Hazards Mapping Act

The Seismic Hazards Mapping Act of 1990 (PRC 2690–2699.6) is intended to reduce damage resulting from earthquakes. While the Alquist-Priolo Act addresses surface fault rupture, the Seismic Hazards Mapping Act addresses other earthquake-related hazards, including strong ground shaking, liquefaction, and seismically induced landslides. Its provisions are similar in concept to those of the Alquist-Priolo Act: the ~~s~~State is charged with identifying and mapping areas at risk of strong ground shaking, liquefaction, landslides, and other corollary hazards; and cities and counties are required to regulate development within mapped seismic hazard zones.

Under the Seismic Hazards Mapping Act, permit review is the primary mechanism for local regulation of development. Under PRC 2697, cities and counties must require, prior to the approval of a project located in a seismic hazard zone, a geotechnical report defining and delineating any seismic hazard. Each city or county must submit one copy of each geotechnical report, including mitigation measures, to the State Geologist within 30 days of its approval.

## Construction General Permit (Order 2009-0009-DWQ as amended by Order 2010-0014-DWQ and Order 2012-006-DWQ)

Construction activities that disturb 1 acre or more of land must obtain coverage under the State Water Resources Control Board (SWRCB) Construction General Permit (Order 2009-0009-DWQ as amended by Order 2010-0014-DWQ and Order 2012-006-DWQ).[2] Under the terms of the permit, applicants must file complete and accurate Notice of Intent and Permit Registration Documents with the SWRCB. Applicants must also demonstrate conformance with applicable construction best management practices (BMPs) and prepare a construction Storm Water Pollution Prevention Plan (SWPPP) containing a site map that shows the construction site perimeter, existing and proposed buildings, lots, roadways, stormwater collection and discharge points, general topography both before and after construction, and drainage patterns across the project area. BMPs include but are not limited to silt fences, straw waddles, sediment traps, and gravel sandbag barriers.

## California Public Resources Code

PRC Section 5097.5 addresses paleontological resources and states that "no person shall "knowingly and willfully excavate~~,~~ upon, or remove, destroy, injure, or deface" any "vertebrate paleontological site, including fossilized footprints~~,~~," or any other paleontological feature situated" on public lands without the "express permission of the public agency having jurisdiction over the lands." Violation of this section is a misdemeanor.

As used in PRC 5097.5, *public lands* means lands owned by or under the jurisdiction of the ~~s~~State or any city, county, district, authority, or public corporation, or any agency thereof. Consequently, public agencies are required to comply with PRC 5097.5 for their own activities, including

[2] For additional details, please see the SWRCB Orders, which are available online at: https://www.waterboards.ca.gov/water_issues/programs/stormwater/constpermits.shtml

construction and maintenance, as well as for permit actions (e.g., encroachment permits) undertaken by others.

## 4.7.3.3 Local

### County of San Diego ~~Municipal Code~~Code of Regulatory Ordinances Section 87.201-87.218

#### ~~Municipal~~ Code ~~Section 87.201-87.218~~

~~Municipal Code~~of Regulatory Ordinances Section 87.201-87.218 outlines the regulations for Grading Permits. No grading may occur without a valid, unexpired grading permit issues by the County Official, except for exemptions from permit requirement as outlined in this ~~Municipal~~Regulatory Ordinance Code. The ~~Municipal~~Regulatory Ordinance Code also provides standards for major and minor grading, and specific standards for grading as applicable to biological resources.

### County of San Diego General Plan

The Conservation Element of the County ~~of San Diego~~ General Plan provides policies for the protection of natural resources. These policies provide guidance for the preservation of unique geological features.

# 4.7.4 Project Impact Analysis

## 4.7.4.1 Methodology

The analysis approach considers the existing geologic and soil conditions established in Section 4.7.2, *Existing Conditions*, and the applicable laws and regulations pertaining to geologic hazards and soils described in Section 4.7.3, *Applicable Laws and Regulations*, in order to determine the project's potential to directly or indirectly cause substantial adverse effects related to a hazardous geologic condition or event. The analysis draws on data from Ninyo & Moore's *Geotechnical Evaluation*.

This analysis is consistent with CEQA: an EIR is not required to analyze how existing environmental conditions would affect a project's residents or users unless the project would exacerbate those conditions. Therefore, when discussing impacts from the environment on the project, such as how a fault rupture or soil condition may affect a project, the analysis will first determine if there is a potential for the project to exacerbate the issue.

## 4.7.4.2 Thresholds of Significance

### Appendix G of the ~~State~~ CEQA Guidelines

The following significance criteria are based on Appendix G of the ~~State~~ CEQA Guidelines and provide the basis for determining significance of impacts from geotechnical hazards and soil conditions associated with the implementation of the project.

Impacts are considered significant if the project would result in any of the following:

1. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: (i) rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault (refer to Division of Mines and Geology Special Publication 42); (ii) strong seismic ground shaking; (iii) seismic-related ground failure, including liquefaction; (iv) landslides.
2. Result in substantial soil erosion or the loss of topsoil.
3. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site lateral spreading, subsidence, or collapse.
4. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property.
5. Have soils that would be incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems in areas where sewers are not available for the disposal of wastewater?
6. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

## County of San Diego Guidelines for Determining Significance

The following significance criteria are based on the *County of San Diego Guidelines for Determining Significance for Geologic Hazards* (County of San Diego 2007b). Impacts are considered significant if the project would result in any of the following:

Fault Rupture

a. The project proposes any building or structure to be used for human occupancy over or within 50 feet of the trace of an Alquist-Priolo fault or County Special Study Zone fault.

b. The project proposes the following uses within an AP Zone which are prohibited by the County:

i. Uses containing structures with a capacity of 300 people or more. Any use having the capacity to serve, house, entertain, or otherwise accommodate 300 or more persons at any one time.

ii. Uses with the potential to severely damage the environment or cause major loss of life. Any use having the potential to severely damage the environment or cause major loss of life if destroyed, such as dams, reservoirs, petroleum storage facilities, and electrical power plants powered by nuclear reactors.

iii. Specific civic uses. Police and fire stations, schools, hospitals, rest homes, nursing homes, and emergency communication facilities.

Ground Shaking

a. The project site is located within a County Near-Source Shaking Zone or within Seismic Zone 4 and the project does not conform to the Uniform Building Code (UBC).

Liquefaction

a. The project site has potential to expose people or structures to substantial adverse effects because:

i. The project site has potentially liquefiable soils; and

ii. The potentially liquefiable soils are saturated or have the potential to become saturated; and

iii. In-situ soil densities are not sufficiently high to preclude liquefaction.

Landslides

a. The project site would expose people or structures to substantial adverse effects, including the risk of loss, injury, or death involving landslides.

b. The project is located on a geologic unit or soil that is unstable, or would become unstable as a result of the project, potentially resulting in an on- or off-site landslide.

c. The project site lies directly below or on a known area subject to rockfall which could result in collapse of structures.

Expansive Soils

The project is located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), and does not conform with the Uniform Building Code.

## 4.7.4.3 Project Impacts and Mitigation Measures

***Threshold 1: Implementation of the project would not directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: (i) rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault (refer to Division of Mines and Geology Special Publication 42); (ii) strong seismic ground shaking; (iii) seismic-related ground failure, including liquefaction; or (iv) landslides.***

### County Park and Trails and Open Space~~/Preserve~~

#### Impact Discussion

Based on the Ninyo & Moore review of the referenced geologic maps and site reconnaissance, no faults are mapped as underlying the project site. Additionally, the site is not located within a State of California Earthquake Fault Zone (formerly known as Alquist-Priolo Special Studies Zone). The nearest known active fault is the Elsinore fault, approximately 21 miles to the east of the site. However, because the project site is located within a seismically active region, it is possible ground-shaking as a result of seismic activity could occur on the project site. Despite the potential for ground-shaking, the project site is not within a potential liquefaction area or landside susceptibility area.

##### Construction

Construction of the project would include grading, excavation, and building and paving activities, utilizing tractors, excavators, backhoes, a water truck, a drill rig, a bobcat, a forklift, rollers, a rubber tire loader, wheel tractor scrapers, an air compressor, a generator set, a crane, and a concrete truck.

Construction activities would include earthwork such as grading and excavation, but would not include any activities~~,~~ such as natural resource extraction, that have the potential to directly or indirectly result in substantial adverse effects related to rupture of a known earthquake fault. Similarly, while the project is located in a seismically active region, the project would not involve any construction activities that would exacerbate the adverse effects of strong seismic ground-shaking at the project site. Because there are no existing topographic or soil conditions on the project site that would result in the potential for liquefaction or landslide hazards, the project would not exacerbate potential risks associated with th~~o~~ese geologic hazards. Furthermore, construction of the project would comply with all applicable laws and regulations, including the building codes identified in Section 4.7.3 above, and the recommendations of the *Geotechnical Evaluation*, which are based on Ninyo & Moore's evaluation of the site geotechnical conditions (see *Threshold 3*). The recommendations include suggested procedures for grading and building activities as well as design guidelines to address seismic conditions, consistent with applicable building codes and local regulations.

#### Operation

As mentioned, the project would not be located within the area of potential risk for fault rupture, liquefaction, or landslide. Operation of the project would consist of a park for daily visitors~~, one onsite~~ and include a live-on volunteer, ~~and~~maintenance staff, and park rangers to help with maintenance and management of the property. Operational activities would include passive and active recreation, which do not have the potential to result in direct or indirect effects related to a fault condition leading to a rupture or strong seismic ground shaking. Furthermore, the proposed structures would be engineered and built in compliance with applicable laws and regulations as required by the CBC, as well as the specific recommendations for the site provided by the *Geotechnical Evaluation* intended to ensure structures would not result in substantial adverse effects related to fault rupture, ground-shaking, liquefaction, or landslides.

## Impact Determination

Implementation of the project would not directly or indirectly cause potential substantial adverse effects related to the potential rupture of a known earthquake fault, strong seismic ground shaking, or seismic-related ground failure, such as liquefaction, or landslides. Therefore, no significant impacts would occur.

## Mitigation Measures

No mitigation is required.

## Level of Significance After Mitigation

Impacts would be less than significant.

***Threshold 2: The project would not result in substantial soil erosion or the loss of topsoil.***

## County Park and Trails and Open Space~~/Preserve~~

### Impact Discussion

#### Construction

~~The *Geotechnical Evaluation* identified the onsite soils as susceptible to erosion.~~ Erosion or the loss of topsoil can occur due to changes in drainage patterns, changes in filtration or impervious surfaces, or an increase in stormwater runoff. Construction activities would develop the existing undeveloped site that does not currently contain any structures, impervious surfaces, or infrastructure, into a park with structures, paved surfaces, and landscaping. During construction of the project, stormwater drainage patterns could be temporarily altered due to site grading, preparation activities, and excavation, resulting in potential temporary erosion or loss of topsoil. In addition, the *Geotechnical Evaluation* identified the onsite soils as susceptible to erosion. The project would disturb over 1 acre of land; therefore, it would be required to obtain an NPDES General Construction Permit from the SWRCB. Compliance with the General Construction Permit would require the preparation of a SWPPP for the project site. The SWPPP would identify potential pollutants and outline the BMPs that would be implemented during construction activities to prevent soil erosion and discharge of potential pollutants to water resources. Additionally, a Stormwater Quality Management Plan (SWQMP) would be prepared for the project site consistent with the requirements of the *County of San Diego BMP Design Manual*, which would contain site-specific design measures, source control, and/or treatment control BMPs such as landscaped areas, berms, and stormwater retention basins to reduce potential pollutants, including sediment from erosion or siltation, to the maximum extent practicable from entering stormwater runoff. Please see Section 4.10, *Hydrology and Water Quality,* for further information about the requirements of the SWPPP, SWQMP, and *County of San Diego BMP Design Manual*, as well as further discussion of potential water quality impacts related to erosion. County DPR would ensure that the project is implemented as proposed (in compliance with County of San Diego Watershed Protection Ordinance and regional MS4 Permit), which would ensure the project would not result in significantly increased erosion or sedimentation potential, and would not alter any drainage patterns of the site or area on- or off site.

#### Operation

Operation of the project would include several new impervious surfaces as part of the parking areas, restroom facilities, administrative facility/ranger station, basketball courts, pickleball courts, ~~skate~~all-wheel park, bike skills area, and entrance/exit driveways. All other project components (equestrian staging, dog park, fields, and trails) would be construct~~ion~~ed with pervious materials. Impervious surfaces can result in an increase in erosion or topsoil loss because they prevent infiltration of rainwater and can change the drainage patterns of previous undeveloped land. As discussed in the construction analysis, a SWQMP would be prepared for the project, which would include operational BMPs such as site-specific design measures, source control, and/or treatment control BMPs to ensure sediment does not erode from the project site. Additionally, a stormwater retention basin is proposed as part of the project design, located in the southern, down-slope portion of the project site. The retention basin would serve to manage and treat stormwater and

reduce stormwater runoff that could cause soil erosion. The Ninyo & Moore *Geotechnical Evaluation* identified the onsite soils as susceptible to erosion and provided a recommendation for design features to mitigat~~ion~~e erosion on the project site. County DPR would incorporate the recommendations into the project implementation. Therefore, with the implementation of the operational BMPs and the Ninyo & Moore recommendations, as well as compliance with applicable regulations for managing stormwater runoff and erosion (see also *Applicable Laws and Regulations* in Section 4.10), the project would not result in substantial soil erosion or loss of topsoil.

### Impact Determination

The project would not result in substantial soil erosion or loss of topsoil. Impacts would be less than significant.

### Mitigation Measures

No mitigation would be required.

### Level of Significance After Mitigation

Impacts would be less than significant.

***Threshold 3: The project would not be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site lateral spreading, subsidence, or collapse.***

## County Park and Trails and Open Space~~/Preserve~~

### Impact Discussion

#### Construction

The Ninyo & Moore evaluation concluded the project site contained loose topsoil materials that are unsuitable for structural support in their present condition. Ninyo & Moore provided recommendations for remedial grading of these materials to prepare the site for construction. The recommendations include the following:

- **Site Preparation.** Site preparation should begin with the removal of existing improvements, vegetation, utility lines, asphalt, concrete, and other deleterious debris from areas to be graded. Tree stumps and roots should be removed to such a depth that organic material is generally not present. Clearing and grubbing should extend to the outside of the proposed excavation and fill areas. The debris and unsuitable material generated during clearing and grubbing should be removed from areas to be graded and disposed of at a legal dumpsite away from the project area, unless noted ~~otherwise in [the report].~~
- **Excavation Characteristics.** Onsite excavations will encounter very difficult excavation conditions due to the presence of bedrock materials, boulders, and/or corestones. The contractor should be prepared for the use of heavy ripping, rock breaking, rock coring, and/or blasting techniques to perform onsite excavations. Additionally, onsite excavations will generate oversize materials that should be screened, rockpicked, crushed, removed, or otherwise processed from the excavated materials prior to reuse as compacted fill.

- **Temporary Excavations.** For temporary excavations, ~~it is recommended~~Ninyo & Moore recommends that the following Occupational Safety and Health Administration (OSHA) soil classifications be used:

| | |
|---|---|
| Topsoil | Type C |
| Granitic Rock | Type B |

  Upon making the excavations, the soil classifications and excavation performance should be evaluated in the field in accordance with the OSHA regulations. Temporary excavations should be constructed in accordance with OSHA recommendations. For trench or other excavations, OSHA requirements regarding personnel safety should be met using appropriate shoring (including trench boxes) or by laying back the slopes to a slope ratio no steeper than 1½:1 (horizontal to vertical) in topsoil and 1:1 in granitic rock. Temporary excavations that encounter seepage may require shoring or may be stabilized by placing sandbags or gravel along the base of the seepage zone. Excavations encountering seepage should be evaluated on a case-by-case basis. Onsite safety of personnel is the responsibility of the contractor.

- **Remedial Grading – Structural Buildings.** Based on the results of ~~our~~ laboratory testing presented in Appendix F, the existing topsoil possesses a medium to high potential for expansion. To mitigate for the effects of highly expansive onsite soils, ~~it is recommended that~~we recommend the performance of the following remedial grading measures for buildings ~~be employed~~. Furthermore, recommendations to support the structures on deepened foundations, in conjunction with these remedial grading recommendations, are presented in following sections of this report. We recommend that the existing near-surface topsoil within the building pad be removed down to competent decomposed granitic rock or 1 foot below the bottom of footings, whichever is deeper. This overexcavation should extend to the horizontal limits of the building pad. For the purposes of this report, the building pad is defined as the structural footprint (including foundations for attached overhangs, canopies, and other building appurtenances) plus a horizontal distance of 5 feet, where feasible. The lateral extents of the overexcavation may be modified in the field based on site constraints, such as property lines. The extent and depths of removals and overexcavations should be evaluated by Ninyo & Moore's representative in the field based on the materials exposed. Subsequent to performance of the overexcavation removal, the resulting surface should be scarified to a depth of approximately 6 inches, moisture conditioned, and recompacted to a relative compaction of 90 percent as evaluated by the ASTM D 1557 prior to placing new fill. Once the resulting removal surface has been recompacted, the overexcavation should then be backfilled with compacted fill soils placed in accordance with the recommendations herein. We recommend that the upper 2 feet of compacted fill soils placed within the building pads possess a very low to low potential for expansion (i.e. an expansion index of less than 50). As noted earlier, the onsite topsoil possesses a medium to high potential for expansion and are not considered suitable for reuse within the upper 2 feet of compacted fill soils with building pads. Accordingly, the upper 2 feet of compacted fill soils within building pads may consist of import soils, soils derived from onsite excavations into the decomposed granitic rock, or lime-treatment of onsite soils.

- **Remedial Grading – Retaining Walls.** We recommend that the existing near-surface topsoil beneath retaining walls be removed down to a depth of 1 foot below the bottom of the retaining wall foundations. This overexcavation should extend a lateral distance of 1 foot beyond the horizontal limits of the foundation. The lateral extents of the overexcavation may be modified in the field based on site constraints. The extent and depths of removals and overexcavations

should be evaluated by Ninyo & Moore's representative in the field based on the materials exposed. Subsequent to performance of the overexcavation removal, the resulting surface should be scarified to a depth of approximately 6 inches, moisture conditioned, and recompacted to a relative compaction of 90 percent as evaluated by the ASTM D 1557 prior to placing new fill. Once the resulting removal surface has been recompacted, the overexcavation should then be backfilled with compacted fill soils placed in accordance with the recommendations herein. We recommend that the upper 1 foot of compacted fill soils placed beneath retaining walls possess a very low to low potential for expansion (i.e., an expansion index of less than 50). As noted earlier, the onsite topsoil possesses a medium to high potential for expansion and are not considered suitable for reuse within the upper 1 foot of compacted fill soils beneath retaining walls. Accordingly, the upper 1 foot of compacted fill soils beneath retaining walls may consist of import soils, soils derived from onsite excavations into the decomposed granitic rock, or lime-treatment of onsite soils.

- **Remedial Grading – Exterior Pedestrian Concrete Flatwork.** We recommend that the existing near-surface topsoil beneath exterior pedestrian concrete flatwork be removed down to a depth of 2 feet below the planned finished subgrade elevation. This overexcavation should extend a lateral distance of 1 foot beyond the horizontal limits of the flatwork. The lateral extents of the overexcavation may be modified in the field based on site constraints. The extent and depths of removals and overexcavations should be evaluated by Ninyo & Moore's representative in the field based on the materials exposed. Subsequent to performance of the overexcavation removal, the resulting surface should be scarified to a depth of approximately 6 inches, moisture conditioned, and recompacted to a relative compaction of 90 percent as evaluated by the ASTM D 1557 prior to placing new fill. Once the resulting removal surface has been recompacted, the overexcavation should then be backfilled with compacted fill soils placed in accordance with the recommendations herein. We recommend that the upper 2 feet of compacted fill soils placed beneath exterior pedestrian flatwork possess a very low to low potential for expansion (i.e. an expansion index of less than 50). As noted earlier, the onsite topsoil possesses a medium to high potential for expansion and are not considered suitable for reuse within the upper 2 feet of compacted fill soils beneath exterior pedestrian flatwork. Accordingly, the upper 2 feet of compacted fill soils beneath exterior pedestrian flatwork may consist of import soils, soils derived from onsite excavations into the decomposed granitic rock, or lime-treatment of onsite soils.
- **Materials for Fill.** Materials for fill may be processed from onsite excavations or may consist of import materials. Onsite soils with an organic content of less than approximately 3 percent by volume (or 1 percent by weight) are suitable for reuse as general fill material. Fill soils should be free of trash, debris, roots, vegetation, organics, or other deleterious materials. Due to the shallow groundwater moisture conditioning of onsite materials, including drying and/or aerating, should be anticipated. Fill and utility trench backfill materials should not contain rocks or lumps over 3 inches, and not more than 30 percent larger than ¾ inch. Larger chunks, if generated during excavation, may be broken into acceptably sized pieces or disposed of offsite. As noted earlier, expansion index testing presented in Appendix F indicates that some of the onsite topsoil possesses a medium to high potential for expansion. Soils that possess a medium to high potential for expansion (i.e., an expansion index of 50 or more) are not suitable for reuse within the upper 2 feet of building pads, in the upper 1 foot beneath retaining wall footings, as retaining wall backfill, or as the upper 2 feet of subgrade soils beneath pedestrian concrete flatwork. Imported fill material should generally be granular soils with a very low to low

expansion potential (i.e., an expansion index of 50 or less). Import fill material should also be non-corrosive in accordance with the Caltrans amended (2019) AASHTO (2017) corrosion criteria. Non-corrosive soils are soils that possess an electrical resistivity more than 1,100 ohm-centimeters (ohm-cm), a chloride content less than 500 parts per million (ppm), less than 0.15 percent sulfates, and a pH less than 5.5. Materials for use as fill should be evaluated by Ninyo & Moore's representative prior to filling or importing. To reduce the potential of importing contaminated materials to the site, prior to delivery, soil materials obtained from off-site sources should be sampled and tested in accordance with standard practice (DTSC, 2001). Soils that exhibit a known risk to human health, the environment, or both, should not be imported to the site.

- **Compact Fill.** Prior to placement of compacted fill, the contractor should request an evaluation of the exposed ground surface by Ninyo & Moore. Unless otherwise recommended, the exposed ground surface should then be scarified to a depth of approximately 8 inches and watered or dried, as needed, to achieve moisture contents generally at or slightly above the optimum moisture content. The scarified materials should then be compacted to a relative compaction of 90 percent as evaluated in accordance with the ASTM D 1557. The evaluation of compaction by the geotechnical consultant should not be considered to preclude any requirements for observation or approval by governing agencies. It is the contractor's responsibility to notify this office and the appropriate governing agency when project areas are ready for observation, and to provide reasonable time for that review. Fill materials should be moisture conditioned to generally at or slightly above the laboratory optimum moisture content prior to placement. The optimum moisture content will vary with material type and other factors. Moisture conditioning of fill soils should be generally consistent within the soil mass. Prior to placement of additional compacted fill material following a delay in the grading operations, the exposed surface of previously compacted fill should be prepared to receive fill. Preparation may include scarification, moisture conditioning, and recompaction. Compacted fill should be placed in horizontal lifts of approximately 8 inches in loose thickness. Prior to compaction, each lift should be watered or dried as needed to achieve a moisture content generally at or slightly above the laboratory optimum, mixed, and then compacted by mechanical methods to a relative compaction of 90 percent as evaluated by ASTM D 1557. The upper 12 inches of the subgrade materials beneath vehicular pavements should be compacted to a relative compaction of 95 percent relative density as evaluated by ASTM D 1557. Successive lifts should be treated in a like manner until the desired finished grades are achieved.
- **Slopes.** We anticipate that new cut and fill slopes will be constructed for the project. Unless otherwise recommended by our offices and approved by the regulating agencies, permanent cut and fill slopes should not be steeper than 2:1 (horizontal to vertical). Buildings, structures, and improvements should be set back from the top of slopes in accordance with the 2019 CBC. We recommend buildings and structures be set back 20 feet or more from the top of slopes. Compaction of the face of fill slopes should be performed by backrolling at intervals of 4 feet or less in vertical slope height, or as dictated by the capability of the available equipment, whichever is less. Fill slopes should be overbuilt and cut back to finish grades. The placement, moisture conditioning, and compaction of fill slope materials should be done in accordance with the recommendations presented herein. Site runoff should not be permitted to flow over the tops of slopes. Positive drainage should be established away from the top of slopes. This may be accomplished by utilizing brow ditches placed at the top of slopes to divert surface runoff away from the slope face where drainage devices are not otherwise available. The onsite soils are

susceptible to erosion. The project plans and specifications should contain design features and construction requirements to mitigate erosion of soils or contain a maintenance program to redress erosion features as they develop on a periodic basis.

- **Pipe Bedding and Modulus of Soil Reaction (*E'*).** It is our recommendation that new pipelines (pipes), where constructed in open excavations, be supported on 6 or more inches of granular bedding material. Granular pipe bedding should be provided to distribute vertical loads around the pipe. Bedding material and compaction requirements should be in accordance with this report. Pipe bedding typically consists of graded aggregate with a coefficient of uniformity of three or greater.

The recommendations from the Ninyo & Moore *Geotechnical Evaluation* would address any potential substantial issue associated with unstable soils during project construction.

#### Operation

Although the project site is located on unstable soils, operation of the project would include passive and active recreation; it would not include any activities that would result in ground disturbance, significant erosion, or landslides, that could cause hazardous conditions such as subsidence or collapse of the project site.

## Impact Determination

The project would not be located on a geologic unit that is unstable. The project would be located on soil that is unstable, but the project would not exacerbate the condition. With the implementation of the Ninyo & Moore *Geotechnical Evaluation* recommendations as well as adherence to applicable laws and regulations, including the requirements of the CBC, project construction would not result in a geologic unit or soils that would become unstable as a result of the project, and potentially result in on- or offsite lateral spreading, subsidence, or collapse. The impact would be less than significant.

## Mitigation Measures

No mitigation is required.

## Level of Significance After Mitigation

The impact would be less than significant.

***Threshold 4: The project would not be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property.***

## County Park and Trails and Open Space~~/Preserve~~

### Impact Discussion

#### Construction and Operation

As discussed above, the project site is underlain by Bosanko Stony clay which is categorized as having high shrink-swell behavior. The laboratory testing conducted by Ninyo & Moore confirmed the soil on site has a medium to high potential for expansion. Construction on expansive soils can cause damage to structures and even create hazards for people inhabiting structures because as soils expand or contract they can cause distress to structures or foundations, and can lead to cracking, or tilting. Construction of the project would be conducted in compliance with the regulations of the CBC and the County Code of ~~San Diego Municipal Code~~Regulatory Ordinances regulations for grading, earthwork, and construction. In addition, the project would implement the recommendations put forth by the Ninyo & Moore *Geotechnical Evaluation*, as described in the analysis for Threshold 3, above. These site-specific recommendations, as well as further engineering recommendations to support the structures on deepened foundations, would ensure the appropriate procedures and engineering techniques are followed during construction to diminish potential risks associated with construction on the onsite expansive soils, and would also ensure the project would not exacerbate existing onsite conditions. Furthermore, operations of the project would not involve any activities that would exacerbate the existing expansive soils onsite.

### Impact Determination

The project would be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code, but would not create substantial direct or indirect risks to life or property. Impacts would be less than significant.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

The impacts would be less than significant.

***Threshold 5: Implementation of the project would not involve soils incapable of adequately supporting the use of septic tanks or alternative ~~waste water~~wastewater disposal systems where sewers are not available for the disposal of ~~waste water~~wastewater.***

## County Park and Trails and Open Space~~/Preserve~~

### Impact Discussion

#### Construction and Operation

The project is proposing two options for sewage disposal: (1) connecting to the existing public sewer line within Tavern Road or the existing sewer line within the northern portion of South Grade Road, or (2) installing an onsite sewer treatment system in the northern portion of the project. The second option would be a septic system with a filter treatment system and treatment leach field. The project is underlain by Bosanko stony clay, which is rated as "severe" for septic tank effluent disposal due to permeability rate (USDA 1973). Projects with a discharge of wastewater must conform to the Regional Water Quality Control Board's (RWQCB's) applicable standards, including the Regional Basin Plan and the California Water Code (see Section 4.10 for further description of these regulations). California Water Code Section 13282 allows RWQCBs to authorize a local public agency to issue permits for on-site wastewater systems (OSWS) "to ensure that systems are adequately designed, located, sized, spaced, constructed and maintained." The RWQCBs with jurisdiction over San Diego County have authorized the County ~~of San Diego~~, Department of Environmental Health ~~(DEH~~and Quality (DEHQ) to issue certain OSWS permits throughout the County and within the incorporated cities. DEHQ would review the OSWS layout for the project pursuant to DEHQ, Land and Water Quality Division's, *On-site Wastewater Systems: Permitting Process and Design Criteria*. Therefore, the project site would be evaluated by the authorized, local public agency for a determination of the suitability of onsite soils for the proposed septic system. In addition, the project would comply with the San Diego County Code of Regulatory Ordinances, Title 6, Division 8, Chapter 3, Septic Tanks and Seepage Pits, which regulates the use of septic systems in San Diego County.

### Impact Determination

The project would not involve soils incapable of adequately supporting the use of septic tanks or alternative ~~waste water~~wastewater disposal systems where sewers are not available for the disposal of ~~waste water~~wastewater. The construction and operation of a septic system as part of the project would comply with the existing regulations and approval process and would not result in a significant impact related to onsite soils unsuitable for septic systems. Impacts would be less than significant.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

Impacts would be less than significant.

***Threshold 6: The project would directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.***

## County Park and Trails and Open Space~~/Preserve~~

### Impact Discussion

~~Based~~As discussed in Section 4.5, *Cultural Resources*, based on the results of the records search performed by the SDNHM, portions of the project site, including the Tavern Road sewer line option are underlain by geologic units assigned low or no paleontological potential. The southern and western portions of the project site and portions of the South Grade Road sewer line option are underlain by a geologic unit with moderate paleontological sensitivity. No recorded fossil localities were identified within 1 mile of the project site.

#### Construction

The primary type of activities that directly destroy a unique paleontological resource or site are those that are ground disturbing. Construction of the project would include ground-disturbing activities such as grading and excavation. As described above, portions of the project site, including the potential Tavern Road sewer line option are underlain by geologic units assigned low or no paleontological potential. In these areas, construction is unlikely to result in impacts on paleontological resources; thus, impacts would be less than significant. However, the southern and western portions of the project site and portions of the potential South Grade Road sewer line option are underlain by a geologic unit with moderate paleontological sensitivity. Due to this sensitivity, ground-disturbing construction activities could result in impacts on paleontological resources (**Impact-GEO-1**). Any proposed excavation activities that extend deep~~ly~~ enough to encounter previously undisturbed deposits of the Lusardi Formation have the potential to ~~encounter and then potentially~~ impact the paleontological resources possibly preserved therein. In these areas, construction activities are expected to include grading, digging, and excavation to prepare the site, build the active recreation facilities, and build the parking lots and infrastructure; as well as building the berm along the southeastern and southern boundaries of the site. ~~In order to~~To reduce the potential impact during construction activities, implementation of a paleontological resource mitigation program during ground-disturbing activities is required (**MM-GEO-1**).

#### Operation

Operation of the project would include active and passive recreation; there would be no ground-disturbing activities during operation. As such, operation would not disturb geologic units with moderate paleontological sensitivity, and would not result in any potential impacts on paleontological resources.

### Impact Determination

The project would result in potential impacts on paleontological resources.

**Impact-GEO-1: Potential Impact on Paleontological Resources.** Ground-disturbing activities that would extend deep~~ly~~ enough to encounter previously undisturbed deposits of the Lusardi Formation in the southern and western portions of the project site would have the potential to impact paleontological resources.

## Mitigation Measures

**MM-GEO-1: Implement a Paleontological Resource Mitigation Program**. Ground-disturbing construction activities in the southern and western portion of the project site shall be subject to paleontological and geologic resource sensitivity screening prior to commencement of construction. The resource sensitivity screening shall determine which ground-disturbing activities would be deep~~ly~~ enough to encounter previously undisturbed deposits of the Lusardi Formation. County DPR shall retain a Qualified Paleontologist who shall oversee paleontological monitoring by a qualified Paleontological Monitor or cross-trained Paleontological/ Archaeological monitor during ground-disturbing activities. The paleontological monitoring shall include the following measures:

- A Qualified Paleontologist shall attend the preconstruction meeting(s) to consult with the grading and excavation contractors or subcontractors concerning excavation schedules, paleontological field techniques, and safety issues.
- A Qualified Paleontologist or Paleontological Monitor or cross-trained Paleontological/ Archaeological Monitor shall be on site, on a full-time basis, during ground-disturbing activities that occur 10 feet or more below ground surface, to inspect exposures for contained fossils. The Paleontological Monitor shall work under the direction of the project's Qualified Paleontologist. A "Paleontological Monitor" shall be defined as an individual selected by the Qualified Paleontologist who has experience in monitoring excavation and the collection and salvage of fossil materials.
- If fossils are discovered on the project site, the Qualified Paleontologist shall recover them and temporarily direct, divert, or halt grading to allow recovery of fossil remains.
- The Qualified Paleontologist shall be responsible for the cleaning, repairing, sorting and cataloguing of fossil remains collected during the monitoring and salvage portion of the mitigation.
- The Qualified Paleontologist shall deposit and donate prepared fossils, along with copies of all pertinent field notes, photos, and maps, in a scientific institution with permanent paleontological collections, such as the San Diego Natural History Museum, approved by County DPR.
- Within 30 days after the completion of excavation and pile-driving activities, a final data recovery report shall be completed by the Qualified Paleontologist and submitted to County DPR for review and approval. The final report shall document the results of the mitigation and shall include discussions of the methods used, stratigraphic section(s) exposed, fossils collected, and significance of recovered fossils.

## Level of Significance After Mitigation

The implementation of **MM-GEO-1** would require the implementation of a Paleontological Resource Mitigation Program, which would prevent impacts on paleontological resources, and if fossils are unexpectedly discovered, would require the proper handling and recording of such fossils. Therefore, the implementation of **MM-GEO-1** would reduce **Impact-GEO-1** to less than significant.

# 4.7.5 Summary of Significant Impacts

**Table 4.7-1. Summary of Significant Geology and Soils Impacts and Mitigation Measures**

| Summary of Potentially Significant Impact(s) | Summary of Mitigation Measure(s) | Level of Significance After Mitigation | Rationale for Finding After Mitigation |
|---|---|---|---|
| **Impact-GEO-1: Potential Impact on Paleontological Resources.** | **MM-GEO-1: Implement a Paleontological Resource Mitigation Program.** | Less than Significant | **MM-GEO-1** would require monitoring during ground-disturbing activities, and if fossils are discovered, would require the proper handling and recording of such fossils. |

Section 4.8
# Greenhouse Gas Emissions and Climate Change

## 4.8.1 Overview

This section describes the current state of climate change science, summarizes greenhouse gas (GHG) emission sources in California, and identifies applicable regulations. This is followed by a discussion of project-generated GHG emissions, the potential contribution of project-generated GHG emissions to global climate change, a qualitative analysis of the project's consistency with plans to reduce GHG emissions, and mitigation for significant impacts where feasible. Supporting GHG calculations are presented in Appendix C.

## 4.8.2 Existing Conditions

GHG emissions become well mixed within the atmosphere and are transported over long distances. Consequently, unlike other resource areas that are concerned primarily with localized project impacts (e.g., within 1,000 feet of the project site), the global nature of climate change requires a broader analytic approach. Although this section focuses on GHG emissions generated at the project site as a result of construction and operation, the analysis considers potential regional and global GHG impacts.

### 4.8.2.1 Global Climate Change

The process known as the ~~"~~greenhouse effect~~"~~ keeps the atmosphere near Earth's surface warm enough for the successful habitation of humans and other life forms. The greenhouse effect is created by sunlight that passes through the atmosphere. Some of the sunlight striking ~~the earth~~Earth is absorbed and converted to heat, which warms the surface. The surface emits a portion of this heat as infrared radiation, some of which is re-emitted toward the surface by GHGs. Human activities that generate GHGs increase the amount of infrared radiation absorbed by the atmosphere, thereby enhancing the ~~"~~greenhouse effect~~"~~ and amplifying the warming of Earth.

Increases in fossil fuel combustion and deforestation have exponentially increased concentrations of GHGs in the atmosphere since the Industrial Revolution (IPCC 2007). Rising atmospheric concentrations of GHGs, in excess of natural levels, have resulted in increasing global surface temperatures—a process commonly referred to as global warming. Higher global surface temperatures have, in turn, resulted in changes to Earth's climate system, including increases in ocean temperature and acidity, reduced sea ice, variable precipitation, and increases in the frequency and intensity of extreme weather events (IPCC 2018). Large-scale changes to ~~the earth's~~Earth's system are collectively referred to as climate change.

The Intergovernmental Panel on Climate Change (IPCC) was established by the World Meteorological Organization and United Nations Environment Programme to assess scientific, technical, and socioeconomic information relevant to the understanding of climate change, its potential impacts, and options for adaptation and mitigation. The IPCC estimates that human-induced warming reached approximately 1 degree Celsius (°C) above pre-industrial levels in 2017

and is increasing at a rate of 0.2°C per decade. Under the current nationally determined contributions of mitigation from each country until 2030, global warming is expected to rise to 3°C by 2100 and continue afterward (IPCC 2018). Large increases in global temperatures could have substantial adverse effects on the natural and human environments in California and worldwide.

### 4.8.2.2 Principal Greenhouse Gases

The principle anthropogenic (human-made) GHGs are carbon dioxide ($CO_2$), methane ($CH_4$), nitrous oxide ($N_2O$), and fluorinated compounds, including sulfur hexafluoride, hydrofluorocarbons (HFCs), and perfluorocarbons. The primary GHGs that would be emitted by project-related construction and operations include $CO_2$, $CH_4$, and $N_2O$. The principal characteristics of these pollutants are discussed below.

**Carbon dioxide** enters the atmosphere through the combustion of fossil fuel (i.e., oil, natural gas, coal), solid waste decomposition, plant and animal respiration, and chemical reactions (e.g., from manufacturing cement). $CO_2$ is also removed from the atmosphere, or sequestered, when it is absorbed by plants as part of the biological carbon cycle.

**Methane** is emitted during the production and transport of coal, natural gas, and oil. $CH_4$ emissions also result from livestock and agricultural practices as well as the anaerobic decay of organic waste in municipal solid waste landfills.

**Nitrous oxide** is emitted by agricultural and industrial activities as well as the combustion of fossil fuels and solid waste.

Methods have been set forth to describe emissions of GHGs in terms of a single gas to simplify reporting and analysis. The most commonly accepted method for comparing GHG emissions is the global warming potential (GWP) methodology defined in IPCC reference documents. IPCC defines the GWP of various GHG emissions on a normalized scale that recasts all GHG emissions in terms of carbon dioxide equivalent (CO2e), which compares the gas in question to that of the same mass of $CO_2$. By definition, $CO_2$ has a GWP of 1.

Table 4.8-1 lists the global warming potential of $CO_2$, $CH_4$, and $N_2O$ and their lifetimes in the atmosphere.

**Table 4.8-1. Lifetimes and Global Warming Potentials of Key Greenhouse Gases**

| Greenhouse Gas | Global Warming Potential (100 years) | Lifetime (years) |
|---|---|---|
| Carbon Dioxide ($CO_2$) | 1 | --[1] |
| Methane ($CH_4$) | 25 | 12 |
| Nitrous Oxide ($N_2O$) | 298 | 114 |

Source: CARB 2020a.

[1] No lifetime (years) for carbon dioxide was presented by the California Air Resources Board.

The California Air Resources Board (CARB) recognizes the importance of reducing emissions of short-lived climate pollutants (SLCPs), as described in Section 4.8.3, *Applicable Laws and Regulations*, to achieve the ~~s~~State's overall climate change goals. SLCPs have atmospheric lifetimes on the order of a few days to a few decades, and their relative climate-forcing impacts, when measured in terms of how they heat the atmosphere, can be tens, hundreds, or even thousands of

times greater than that of $CO_2$ (CARB 2017a). Given their short-term lifespan and warming impact, SLCPs are measured in terms of $CO_2e$ using a 20-year time period. The use of GWPs with a time horizon of 20 years captures the importance of the SLCPs and gives a better perspective as to the speed at which emission controls will affect the atmosphere relative to $CO_2$ emission controls. The Short-Lived Climate Pollutant Reduction Strategy (SLCP Reduction Strategy), as discussed Section 4.8.3, addresses $CH_4$, HFC gases, and anthropogenic black carbon. $CH_4$ has lifetime of 12 years and a 20-year GWP of 72. HFC gases have lifetimes of 1.4 to 52 years and a 20-year GWP of 437 to 6,350. Anthropogenic black carbon has a lifetime of a few days to weeks and a 20-year GWP of 3,200. The project's emission sources are not major contributors of HFC and black carbon; therefore, they are not discussed herein.

# 4.8.2.3 Greenhouse Gas Inventories

## International, National, Statewide, and Regional GHG Emissions

A GHG inventory is a quantification of all GHG emissions and sinks[1] within a selected physical and/or economic boundary. GHG inventories can be performed on a large scale (e.g., for global and national entities) or on a small scale (e.g., for a building or person). Although many processes are difficult to evaluate, several agencies have developed tools to quantify emissions from certain sources. Table 4.8-2 outlines the most recent global, national, statewide, and local GHG inventories to help contextualize the magnitude of potential project-related emissions.

**Table 4.8-2. Global, National, State, and Regional Greenhouse Gas Emission Inventories**

| Emissions Inventory | $CO_2e$ (metric tons) |
|---|---|
| 2017 IPCC Global Inventory | 53,500,000,000 |
| 2019 EPA National Inventory | 6,558,000,000 |
| 2018 CARB State Inventory | 425,300,000 |
| 2012 San Diego Regional Inventory | 35,000,000 |

Sources~~:~~: United Nations 2018; EPA 2021; CARB 2020; SANDAG 2015
EPA = U.S. Environmental Protection Agency

# 4.8.2.4 Impacts of Global Climate Change

Climate change is a complex process that has the potential to alter local climatic patterns and meteorology. Although modeling indicates that climate change will result in sea-level rise, both globally and in San Diego County, as well as changes in climate and rainfall, among other effects, there remains uncertainty about characterizing precise local climate characteristics and predicting precisely how various ecological and social systems will react to changes in the existing climate at the local level. Regardless of this uncertainty, it is widely understood that substantial climate change has occurred and will continue to occur in the future, although the precise extent will take further research to define. Specifically, the effects from global climate change in California and worldwide include the following:

- Declining sea ice and mountain snowpack levels, thereby increasing sea levels and sea surface evaporation rates, with a corresponding increase in atmospheric water vapor due to the

[1] A GHG sink is a process, activity, or mechanism that removes a GHG from the atmosphere.

atmosphere's ability to hold more water vapor at higher temperatures (California Natural Resources Agency 2019).

- Rising average global sea levels, due primarily to thermal expansion in the oceans and the melting of glaciers, ice caps, and the Greenland and Antarctic ice sheets (IPCC 2018).
- Changing weather patterns, including changes in precipitation and wind patterns, and more energetic episodes of extreme weather, including droughts, heavy precipitation, heat waves, extreme cold, and intense tropical cyclones (IPCC 2018).
- Declining Sierra Nevada snowpack levels, which account for approximately half of the surface water storage in California. Snow levels could decline by 70 to as much as 90% over the next 100 years (California Natural Resources Agency 2019).
- Increases in the number of days that could be conducive to ground-level ozone formation (e.g., clear days with intense sunlight) by the end of the twenty-first century in areas with high levels of ozone. The number of days could increase by 25 to 85%, depending on the future temperature scenario.
- Increases in the potential for erosion of California's coastlines as well as seawater intrusion into the Sacramento Delta and associated levee systems due to the rise in sea level.
- The severity of drought conditions in California could be exacerbated (e.g., durations and intensities could be amplified, ultimately increasing the risk of wildfires and consequential damage).
- Under changing climate conditions, agricultural operations are forecast to experience lower crop yields due to extreme heat waves, heat stress, increased water needs of crops and livestock (particularly during dry and warm years), and new and changing pest and disease threats.

The impacts of climate change, such as increases in the number of heat-related events, droughts, and wildfires, pose direct and indirect risks to public health, with people experiencing worsening episodes of illness and an earlier death. Indirect impacts on public health include increases in incidents of vector-borne diseases, stress, and mental trauma due to extreme events and disasters, economic disruptions, and residential displacement.

# 4.8.3 Applicable Laws and Regulations

## 4.8.3.1 Federal

There is currently no federal overarching law specifically related to climate change or reductions in GHG emissions. Under the Obama administration, the U.S. Environmental Protection Agency (EPA) had been developing regulations under the Clean Air Act (CAA). There have also been settlement agreements between EPA, several states, and nongovernmental organizations to address GHG emissions from electric generating plants and refineries. In addition, EPA issued an Endangerment Finding and a Cause or Contribute Finding. EPA also adopted a Mandatory Reporting Rule and Clean Power Plan. Under the Clean Power Plan, EPA issued regulations to control $CO_2$ emissions from new and existing coal-fired power plants. However, on February 9, 2016, the Supreme Court issued a stay regarding these regulations pending litigation. In addition, former EPA Administrator Scott Pruitt

signed a measure to repeal the Clean Power Plan. The fate of the proposed regulations is uncertain given the change in federal administrations and the pending deliberations in federal courts.

### Corporate Average Fuel Economy Standards

The National Highway Traffic Safety Administration's (NHTSA's) Corporate Average Fuel Economy (CAFE) standards require substantial improvements in fuel economy and reductions in GHG emissions generated by passenger cars and light-duty trucks sold in the United States. On August 2, 2018, NHTSA and EPA proposed amendments to the current fuel efficiency standards for passenger cars and light-duty trucks and new standards for model years 2021 through 2026. Under the Safer Affordable Fuel-Efficient (SAFE) Vehicles Rule, current 2020 standards would be maintained through 2026. On September 19, 2019, EPA and NHTSA issued a final action on the One National Program Rule, which is considered Part One of the SAFE Vehicles Rule and a precursor to the proposed fuel efficiency standards. The One National Program Rule enables EPA/NHTSA to provide nationwide uniform fuel economy and GHG vehicle standards by (1) clarifying that federal law preempts state and local tailpipe GHG standards, (2) affirming NHTSA's statutory authority to set nationally applicable fuel economy standards, and (3) withdrawing California's CAA preemption waiver to set state-specific standards.

EPA and NHTSA published their decision to withdraw California's waiver and finalize regulatory text related to the preemption on September 27, 2019 (84 *Federal Register* 51310). California, 22 other states, the District of Columbia, and two cities filed suit against Part One of the SAFE Vehicles Rule on September 20, 2019 (*California et al. v. United States Department of Transportation et al.*, 1:19-cv-02826, U.S. District Court for the District of Columbia). On October 28, 2019, the Union of Concerned Scientists, Environmental Defense Fund, and other groups filed a protective petition for review after the federal government sought to transfer the suit to the D.C. Circuit (*Union of Concerned Scientists v. National Highway Traffic Safety Administration*). The lawsuit filed by California and others is stayed pending resolution of the petition.

EPA and NTHSA published final rules to amend and establish national $CO_2$ and fuel economy standards on April 30, 2020 (Part Two of the SAFE Vehicles Rule) (85 *Federal Register* 24174). The revised rule changes the national fuel economy standards for light-duty vehicles from 46.7 to 40.4 miles per gallon in future years. California, 22 other states, and the District of Columbia filed a petition for review of the final rule on May 27, 2020.[2]

On January 20, 2021, President Biden issued an Executive Order (EO) directing the EPA and NHTSA to review the SAFE Vehicles Rule and propose a new rule suspending, revising, or rescinding it. On April 22, 2021, NTHSA issued a notice of proposed rulemaking to repeal the SAFE Vehicles Rule (49 Code of Federal Regulations Parts 531 and 533).

## 4.8.3.2 State

California has taken proactive steps, briefly described in this section, to address the issues associated with GHG emissions and climate change. Much of this establishes a broad framework for the ~~s~~State's long-term GHG and energy reduction goals and climate change adaptation program. The former and current governors of California have also issued several EOs related to the ~~s~~State's

[2] *California et al. v. United States Department of Transportation et al.*, 1:19-cv-02826, U.S. District Court for the District of Columbia.

evolving climate change policy. Summaries of key policies, EOs, regulations, and legislation at the ~~s~~State level that are relevant to the project are provided below in chronological order.

## Assembly Bill 1493

Assembly Bill (AB) 1493 (2002) (Pavley I) requires CARB to develop and implement regulations to reduce automobile and light-duty truck GHG emissions. These stricter emissions standards were designed to apply to automobiles and light-duty trucks for model years 2009 to 2016. Additional strengthening of the Pavley standards (referred to previously as Pavley II, and now referred to as the Advanced Clean Cars measure) was adopted for vehicle model years 2017–2025 in 2012. Together, the two standards are expected to increase average fuel economy to roughly 54.5 miles per gallon in 2025.

## Executive Order S-3-05

On June 1, 2005, Governor Arnold Schwarzenegger signed California EO S-3-05. The goal of this EO was to reduce California's GHG emissions to (1) 2000 levels by 2010, (2) 1990 levels by 2020, and (3) 80% below the 1990 levels by 2050. EO S-3-05 also calls for the California Environmental Protection Agency to prepare biennial science reports on the potential impact of continued global warming on certain sectors of the California economy. As a result of the scientific analysis presented in these biennial reports, a comprehensive Climate Adaptation Strategy was released in December 2009 following extensive interagency coordination and stakeholder input. The latest of these reports, *Climate Action Team Biennial Report*, was published in December 2010.

## Assembly Bill 32

One goal of EO S-03-05 was further reinforced by AB 32 (Chapter 488, Statutes of 2006), the Global Warming Solutions Act of 2006, which requires the ~~s~~State to reduce GHG emissions to 1990 levels by 2020. Since AB 32 was adopted, CARB, the California Energy Commission (CEC), the California Public Utilities Commission (CPUC), and the California Building Standards Commission have been developing regulations that will help meet the goals of AB 32. Under AB 32, CARB is required to prepare a Scoping Plan and update it every 5 years. The Scoping Plan was approved in 2008, the first update was approved in 2014, and an additional update was approved in 2017 (see discussion of Senate Bill [SB] 32 below). The Scoping Plan identifies specific measures to reduce GHG emissions to 1990 levels by 2020 and requires CARB and other ~~s~~State agencies to develop and enforce regulations and other initiatives for reducing GHGs. Specifically, the AB 32 Scoping Plan articulates a key role for local governments, recommending they establish GHG reduction goals for both their municipal operations and the community consistent with those of the ~~s~~State.

## Low Carbon Fuel Standard

With EO S-01-07, Governor Schwarzenegger set forth the low carbon fuel standard (LCFS) for California in 2007. Under this EO, the carbon intensity of California's transportation fuels is to be reduced by at least 10% by 2020. In September 2018, the LCFS regulation was amended to increase the statewide goal to a 20% reduction in carbon intensity of California's transportation fuels by 2030.

## Senate Bill 375

SB 375, signed into law by Governor Schwarzenegger on September 30, 2008, became effective January 1, 2009. This law requires the ~~s~~State's 18 Metropolitan Planning Organizations (MPOs) to develop the sustainable communities strategies (SCS) as part of their regional transportation plans (RTPs) through integrated land use and transportation planning, and to demonstrate an ability to attain the GHG emissions reduction targets that the CARB established for the region by 2020 and 2035. This would be accomplished through either the financially constrained SCS as part of the RTP or an unconstrained alternative planning strategy. If regions develop integrated land use, housing, and transportation plans that meet the SB 375 targets, new projects in these regions can be relieved of certain CEQA review requirements.

## Senate Bills 1078, 107, and 2

SBs 1078 (2002), 107 (2006), and 2 (2011), California's Renewables Portfolio Standard (RPS), obligates investor-owned utilities, energy service providers, and Community Choice Aggregators to procure additional retail sales per year from eligible renewable sources with the long-range target of procuring 33% of retail sales from renewable resources by 2020. CPUC and CEC are jointly responsible for implementing the program.

## Cap-and-Trade

CARB adopted the "cap-and-trade" program in October 2011. The California "cap-and-trade" program is a market-based system with an overall emissions limit for affected emission sources. Affected sources include in-state electricity generators, hydrogen production, petroleum refining, and other large-scale manufacturers and fuel suppliers and distributors. The original "cap-and-trade" program set a compliance schedule through 2020. AB 398 extends the program through 2030 and requires CARB to make refinements, including establishing a price ceiling. Revenue generated from the "cap-and-trade" program is used to fund various programs. AB 398 established post-2020 funding priorities, to include (1) air toxics and criteria pollutants, (2) low and zero carbon transportation, (3) sustainable agricultural practices, (4) healthy forests and urban greening, (5) SLCPs, (6) climate adaptation and resiliency, and (7) climate and clean energy research.

## Short-Lived Climate Pollutant Reduction Strategy

SB 1383, adopted in 2013, requires CARB to develop and implement a SLCP Reduction Strategy with the following 2030 goals: 40% reduction in methane, 40% reduction in HFC gases, and 50% reduction in anthropogenic black carbon below 2013 levels. Per its directive, CARB adopted the SLCP Reduction Strategy, establishing a path to decrease SLCPs from various sectors of the economy. Strategies span from wastewater and landfill practices and methane recovery to reducing natural gas leaks and consumption. The SLCP Reduction Strategy also identifies measures that can reduce HFC emissions through incentive programs and limitations on the use of high-GWP refrigerants in new refrigeration and air-conditioning equipment.

## Senate Bill 743

Governor Jerry Brown signed SB 743 on September 27, 2013, which mandated a change in the way that public agencies evaluate transportation impacts of projects under CEQA, focusing on vehicle miles traveled (VMT), rather than level of service and other delay-based metrics. SB 743 states that

new methodologies under CEQA are needed for evaluating transportation impacts that are better able to reduce GHG emissions and traffic-related air pollution, promoting the development of a multimodal transportation system, and providing clean, efficient access to destinations. It further intended to balance the need for level of service standards with the ~~s~~State's need to build infill housing and mixed-use commercial developments within walking distance of mass transit facilities and downtowns or town centers. SB 743 allowed for measurements of transportation impacts that could include VMT, VMT per capita, automobile trip generation rates, or automobile trips generated. Accordingly, SB 743 required the Governor's Office of Planning and Research (OPR) to amend the ~~State~~ CEQA Guidelines to reflect these changes. In support of these changes, OPR published its Technical Advisory on Evaluating Transportation Impacts in CEQA, which recommends that the determination of the transportation impact of a project be based on whether project-related VMT per capita (or VMT per employee) would be 15% lower than that of existing development in the region (OPR 2018a). OPR's technical advisory explains that this criterion is consistent with Section 21099 of the California Public Resources Code, which states that the criteria for determining significance must "promote the reduction of greenhouse gas emissions" (OPR 2018a).

The ~~State~~ CEQA Guidelines required all jurisdictions in California to use VMT-based thresholds of significance. SB 743 is discussed in greater detail in Section 4.17, *Transportation and Circulation*.

## Assembly Bill 1826

In October 2014, Governor Brown signed AB 1826 Chesbro (Chapter 727, Statutes of 2014), requiring businesses to recycle their organic waste on and after April 1, 2016, depending on the amount of waste they generate per week. This law also requires that on and after January 1, 2016, local jurisdictions across the ~~s~~State implement an organic waste recycling program to divert organic waste generated by businesses, including multifamily residential dwellings that consist of five or more units (although multifamily dwellings are not required to have a food waste diversion program). Organic waste (also referred to as organics throughout this resource) means food waste, green waste, landscape and pruning waste, nonhazardous wood waste, and food-soiled paper waste that is mixed in with food waste. As of September 2020, businesses that generate 2 cubic yards or more of commercial solid waste per week must arrange for organic waste recycling services. Although not directly applicable, the project would provide adequate waste and recycling receptacles throughout the project site.

## Executive Order B-30-15

Governor Jerry Brown signed EO B-30-15 on April 29, 2015. EO B-30-15 established a medium-term goal for 2030 of reducing GHG emissions by 40% below 1990 levels and requires the CARB to update its current AB 32 Scoping Plan to identify measures to meet the 2030 target. EO B-30-15 supports EO S-3-05 but is only binding on ~~s~~State agencies.

## Senate Bill 32 and Assembly Bill 197

SB 32 (2016) requires CARB to ensure that statewide GHG emissions are reduced to at least 40% below the 1990 level by 2030, consistent with the target set forth in EO B-30-15. The companion bill to SB 32, AB 197, creates requirements to form a Joint Legislative Committee on Climate Change Policies, requires CARB to prioritize direct emission reductions and consider social costs when adopting regulations to reduce GHG emissions beyond the 2020 statewide limit, requires CARB to prepare reports on sources of GHGs and other pollutants, establishes 6-year terms for voting

members of CARB, and adds two legislators as non-voting members of CARB. Both bills were signed by Governor Brown in September 2016.

CARB approved the *2017 Climate Change Scoping Plan* in December 2017, which serves to meet the GHG reduction requirements set for in SB 32 and builds on the programs set in place as part of the previous Scoping Plan that was drafted to meet the 2020 reduction targets per AB 32. The 2017 Scoping Plan proposes meeting the 2030 goal by accelerating the focus on zero and near-zero technologies for moving freight, continued investment in renewables, greater use of low-carbon fuels, including electricity and hydrogen, stronger efforts to reduce emissions of SLCPs (e.g., $CH_4$, black carbon, fluorinated gases), further efforts to create walkable communities with expanded mass transit and other alternatives to traveling by car, continuing the cap-and-trade program, and ensuring that natural lands become carbon sinks to provide additional emissions reductions and flexibility in meeting the target.

The 2017 Scoping Plan recommends that local governments aim to achieve community-wide efficiency of 6 metric tons of carbon dioxide-equivalent ($MTCO_2e$) per capita by 2030 and 2 $MTCO_2e$ per capita by 2050 to be used in local climate action planning. These efficiency targets would replace the "15% from 2008 levels by 2020" approach recommended in the initial Scoping Plan, which would allow for local governments to grow in a sustainable manner.

The 2017 Scoping Plan also emphasizes the importance of reducing VMT by on-road vehicles in the ~~s~~State, with recommendations for 15% reduction in total light-duty VMT from the business-as-usual scenario in 2050. In January 2019, CARB published more specific guidance about VMT in its document titled *2017 Scoping Plan–Identified VMT Reductions and Relationship to the State Climate Goals* (CARB 2019). Recognizing VMT as a proxy for mobile-source GHG emissions, this document includes information about the level of statewide VMT reduction that would promote achievement of statewide GHG emissions reduction targets. CARB found that to be consistent with the transportation assumptions embedded in the 2017 Scoping Plan and with 2050 ~~s~~State climate goals, VMT per capita would need to be approximately 14.3% lower than existing conditions, and light-duty VMT per capita would need to be approximately 16.8% lower than existing conditions.

## Senate Bill 350 and Senate Bill 100

SB 350 (The Clean Energy and Pollution Reduction Act) was signed into law in October 2015. SB 350 requires CARB (in coordination with the CPUC and CEC) to coordinate and implement the following overarching goals:

- Increase the RPS to 50% of retail sales by 2030 and ensure grid reliability.
- Establish annual targets for statewide energy efficiency savings and demand reduction that will achieve a cumulative doubling of statewide energy efficiency savings in electricity and natural gas end uses by 2030.
- Reduce GHG emissions in the electricity sector through the implementation of the above measures and other actions as modeled in their integrated resource plans (IRPs) to meet GHG emissions reductions planning targets in the IRP process. Load-serving entities and publicly-owned utilities meet GHG emissions reductions planning targets through a combination of measures as described in IRPs. The IRPs will detail how each large utility will meet their customers resource needs, minimize price increases, reduce emissions, and ramp up the deployment of clean energy resources.

In September 2018, SB 100 was signed into law, which implements the following goals:

- Increase the RPS to 50% of retail sales by 2026 (moved up by four years from SB 350).
- Increase the RPS to 60% of retail sales by 2030 (new 2030 target).
- Increase the RPS to 100% of retail sales by 2045 (carbon-free goal for 2045).

SB 100 is a legislative action that was signed into law after the 2017 Scoping Plan was adopted. The Scoping Plan modeling is based on the SB 350 target of 50% renewables by 2030. However, the new SB 100 target of 60% renewables by 2030 and 100% renewables by 2045 supersede the goals of SB 350 and will be included in future Scoping Plan updates.

## Executive Order B-55-18

EO B-55-18 was approved by the California legislature and signed by Governor Brown in September 2018. EO B-55-18 acknowledges the environmental, community, and public health risks posed by future climate change. It further recognizes the climate stabilization goal adopted by 194 states and the European Union under the Paris Agreement. Although the United States was not party to the agreement, California is committed to meeting the Paris Agreement goals and going beyond them wherever possible. Based on the worldwide scientific agreement that carbon neutrality must be achieved by midcentury, EO B-55-18 establishes a new ~~s~~State goal to achieve carbon neutrality as soon as possible, and no later than 2045, and to achieve and maintain net negative emissions thereafter. The EO charges the CARB with developing a framework for implementing and tracking progress towards these goals. This EO extends EO S-3-05, but is only binding on ~~s~~State agencies. However, given this directive, it is likely that the carbon neutral goal by 2045 will make its way into future updates to the Scoping Plan, which must be updated every 5 years.

## Green Building Code and Title 24 Updates

The Green Building Standards Code (CALGreen) applies to the planning, design, operation, construction, use, and occupancy of newly constructed buildings and requires the installation of energy- and water-efficient indoor infrastructure for all new projects after January 1, 2011. CALGreen also requires newly constructed buildings to develop a waste management plan and divert at least 50% of the construction materials generated during project construction.

Administrative regulations related to CALGreen Part 11 and the 2016 Building Energy Efficiency Standards were adopted in 2016 (effective January 1, 2017). The 2016 standards resulted in residential construction that was 25% more efficient than previous residential construction. Part 11 also established voluntary standards, which became mandatory in the 2010 edition of the code, including planning and designing for sustainable site development, energy efficiency, water conservation, material conservation, and reductions in internal air contaminants. The standards offer builders better windows, insulation, lighting, ventilation systems, and other features to reduce energy consumption in homes and businesses.

On May 9, 2018, CEC adopted the 2019 Building Energy Efficiency Standards, which took effect on January 1, 2020. The 2019 standards mandate higher efficiency levels and rooftop solar photovoltaic (PV) systems for all new residential buildings constructed in 2020 and beyond. Under the 2019 standards, single-family homes would use approximately 7% less energy than those built under 2016 standards. With incorporation of rooftop solar electricity generation, residential homes could use approximately 53% less energy than homes built under the 2016 standards. Non-residential

buildings will be 30% more energy efficient because the standards will update indoor and outdoor lighting to make maximum use of light-emitting diode (LED) technology. Future CALGreen standards are expected to include a requirement of zero net energy for newly constructed commercial buildings.

### Assembly Bill 1279

The California Climate Crisis Act of 2022 (Assembly Bill 1279), adopted by the Governor on September 16, 2022, declares the State's policy to achieve net zero GHG emissions as soon as possible, but no later than 2045. It also aims to achieve and maintain net negative GHG emissions beyond 2045. By 2045, the bill requires statewide anthropogenic GHG emissions to be reduced to at least 85% below the 1990 levels. The bill mandates that CARB collaborates with relevant State agencies to update the plan, identifying measures to achieve these policy goals. The plan should also incorporate various policies and strategies to enable $CO_2$ removal solutions and the utilization and storage of carbon capture technologies within California. Additionally, CARB is required to submit an annual report outlining its progress.

## 4.8.3.3 Regional

### San Diego Air Pollution Control District

The AB 32 Scoping Plan does not provide an explicit role for local air districts in implementing AB 32, but it does state that CARB will work actively with air districts in coordinating emissions reporting, encouraging, and coordinating GHG reductions, and providing technical assistance in quantifying reductions. The ability of air districts to control emissions (both criteria pollutants and GHGs) is provided primarily through permitting as well as through their role as a CEQA lead or commenting agency, the establishment of CEQA thresholds, and the development of analytical requirements for CEQA documents. As discussed in Section 4.3, *Air Quality and Health Risk*, the San Diego Air Pollution Control District (SDAPCD) is responsible for air quality planning in San Diego County. To date, SDAPCD has not developed specific thresholds of significance with regard to addressing the GHG emissions in CEQA documents.

### San Diego Association of Governments

#### SANDAG San Diego Forward: The Regional Plan

SANDAG is the San Diego region's primary public planning, transportation, and research agency. SANDAG provides the public forum for regional policy decisions about growth and planning. In 2015, SANDAG adopted *San Diego Forward: The Regional Plan*, which includes an implementation program for growth within the San Diego region through 2050. The Regional Plan is built on an integrated set of public policies, strategies, and investments to maintain, manage, and improve the transportation system. Furthermore, the Regional Plan, including its SCS, commits to reducing emissions from transportation sources to comply with SB 375, improving public health, and meeting the National Ambient Air Quality Standards. The SCS included in the Regional Plan envisions reducing GHG emissions through strategies such as focusing on housing and job growth in urbanized areas where there is existing and planned transportation infrastructure; employing smart growth land use policies; investing in a transportation network; addressing the housing needs of all

economic segments or the population; and implementing the Regional Plan through incentives and collaboration (SANDAG 2015).

# 4.8.3.4 Local

## County of San Diego Climate Action Plan

The County adopted the 2018 County of San Diego Climate Action Plan (CAP) on February 14, 2018. The CAP outlined strategies and measures to reduce the County's contribution to GHG emissions and to meet the ~~s~~State's 2020 and 2030 emissions targets, as well as ensure progress towards the 2050 reduction goal. The CAP identifies 11 strategies and 26 measures plus numerous supporting efforts to reduce GHG emissions in the largely rural, unincorporated ~~San Diego County~~area as well as within County ~~government~~ operations (County of San Diego 2021a). These strategies and measures would focus on energy efficiency, developing renewable sources of energy, improving waste recycling, and improving access to sustainable transportation. Measures relevant to the proposed County-sponsored project include the following:

- Measure T-2.3: Reduce County Employee Vehicle Miles Traveled.
- Measure T-3.2: Use Alternative Fuels in County Projects.
- Measure T-3.4: Reduce the County's Fleet Emissions.
- Measure E-1.4: Reduce Energy Use Intensity at County Facilities.
- Measure E-2.4: Increase Use of On-Site Renewable Electricity Generation for County Operations.
- Measure W-1.3: Reduce Potable Water Consumption at County Facilities.
- Measure A-2.2: Increase County Tree Planting.

On September 30, 2020, the County ~~of San Diego~~ Board of Supervisors voted to set aside the approval of the CAP because the courts found a portion of its Supplemental EIR to be out of compliance with CEQA. The County is currently preparing a CAP Update to revise the 2018 CAP and associated EIR in response to the court's direction. In accordance with the ~~State~~ CEQA Guidelines, consistency with the 2018 CAP cannot be relied upon for determination of project-related GHG emissions impact significance until it is reapproved in compliance with CEQA.

Although the court ruling struck down part of the 2018 CAP EIR, the court did not find fault with its 26 GHG reduction measures. Therefore, while the 2018 CAP may not be used for project impact significance determination, the relevant GHG reduction measures of the 2018 CAP may be used to mitigate project-specific GHG impacts (County of San Diego 2021a).

Further discussion on plans, policies, and regulations appropriate for determining significance of GHG emissions impacts related to implementation of the project is provided in Section 4.8.4.2, *Thresholds of Significance*, below.

# 4.8.4 Project Impact Analysis

## 4.8.4.1 Methodology

GHG emissions associated with construction and operation of the project were assessed and quantified (where applicable) using industry standard and accepted software tools, techniques, and emission factors. A summary of the methodology is provided below. A full list of assumptions and emission calculations can be found in Appendix C. The methodology used to estimate GHG emissions discussed below is the same that was used to estimate air quality emissions, as described in Section 4.3.

### Construction

Construction of the project would generate GHG emissions from off-road equipment exhaust and employee vehicles and haul trucks traveling to and from the project site. Emissions were estimated using the California Emissions Estimator Model (CalEEMod), version 2016.3.2. The estimates relied on a combination of CalEEMod default data values as well as information based on similar types of projects provided by ~~the~~ County DPR staff. Construction is expected to begin in the ~~fall~~spring of ~~2022 and last approximately 16 months~~2024. Construction GHG emissions are summed and amortized over the expected life of the project (assumed to be 30 years), consistent with industry standards and the life of the project.

- **Off-Road Equipment:** Emissions associated with diesel-powered construction equipment were estimated based on emission factor~~s~~, horsepower, and load factors from CalEEMod (version 2016.3.2), with activity data (hours per days, days of use) confirmed by County DPR staff.
- **On-Road Vehicles:** On-road vehicles (e.g., delivery trucks, haul trucks, and passenger vehicles) would be required for material deliveries to the project site, material hauling from the project site, onsite material movement, and employee commuting. Exhaust emissions from on-road vehicles were estimated in CalEEMod using daily activity data including the number of trips per day. Emission factors for haul trucks are based on aggregated-speed emission rates for ~~EMFAC's~~EMission FACtor's (EMFAC) heavy-heavy duty truck (HHDT) vehicle category. Emission factors for water and vendor trucks are based on aggregated-speed emission rates for EMFAC's HHDT and medium heavy-duty trucks (MHDT) vehicle categories with a fleet mix consisting of 50% MHDT and 50% HHDT. Emission factors for employee commute vehicles are based on a weighted average of the aggregated-speed emission rates for EMFAC's light-duty automobile/light-duty truck vehicle categories (LDA, LDT1, and LDT2~~).~~).[3] The employee commute vehicles consisted of a fleet mix of 50% LDA, 25% LDT1, and 25% LDT2.

  Based on the project's grading plans, it was estimated that a majority of soil would be balanced on site and soil export trucks would not be required. However, a variety of fill materials for trails and walkways would be imported by haul trucks. Fill material to be imported would require approximately 1,700 trucks trips during the construction period assuming approximately 13,400 cubic yards of import using 16-cubic-yard trucks.

[3] LDA = Passenger Cars, LDT1 = light-duty trucks with equivalent weight test of less than or equal to 3,750 pounds, LDT2 = Light-duty trucks with equivalent weight test of 3,751 to 5,750 pounds.

### Operations

Operation of the project would generate GHG emissions from mobile, area, energy, water, and solid waste sources. CalEEMod was used to estimate GHG emissions from each of these sources, and a discussion of each is provided below. The following analysis was developed assuming the buildout year for the project ~~is assumed to~~would be 2024 based on a fall 2022 construction start date and a 16-month construction period. Retaining the construction schedule and fall 2024 buildout year results in a conservative analysis as GHG emissions in later years would be lower. A detailed description of model input and output parameters and assumptions is provided in Appendix C.

- **Mobile:** GHG emissions from motor vehicles are associated with park visitors. Mobile emissions were estimated using CalEEMod and daily trips provided in the Transportation Impact Study (TIS) prepared for the project (Chen Ryan 2020). The TIS estimated the project would generate 480 daily trips.
- **Area:** Area source emissions were estimated using CalEEMod and are associated with combustion of fuel from landscaping equipment. CalEEMod uses a default value of 180 days per year of landscaping activities.
- **Energy:** Energy source emissions are associated with the consumption of electricity from the project's buildings and lighting. The project would not consume natural gas. Electricity consumption from buildings was estimated in CalEEMod using a Health Club land use as a surrogate for the project's building square footage because the City Park land use does not have energy consumption factors associated with it. The electricity provider for the project area is San Diego Gas and Electric (SDG&E). Based on the SDG&E's power mix for 2019, the $CO_2e$ intensity of SDG&E-provided electricity was 590.8 pounds per megawatt-hour (MWh) (SDG&E 2020). Based on ~~California's renewable portfolio standards~~RPS requirements, SDG&E would be required to have renewable energy sources account for 60% of its power mix in 2030. Using linear interpolation, the 2030 $CO_2e$ intensity would be 344 pounds per MWh. As the project would have a buildout year of 2024, the 2024 intensity factor was assumed to be 478.6 pounds per MWh based on interpolating the 2019 and 2030 values.
- **Water:** GHG emissions from water and wastewater are due to the required energy to supply, distribute, and treat them. Wastewater also results in emissions of GHGs from wastewater treatment systems. Emissions are calculated using CalEEMod and are based on the water usage rate for the land uses, the electrical intensity factors for water supply, treatment, and distribution; and, for wastewater treatment; the GHG emission factors for the electricity utility provider and the emission factors for the wastewater treatment process.
- **Solid Waste:** GHG emissions from solid waste disposal are also calculated using CalEEMod. The GHG emission factors, particularly for $CH_4$, depend on characteristics of the landfill, such as the presence of a landfill gas capture system and subsequent flaring or energy recovery. The default values, as provided in CalEEMod, for landfill gas capture (e.g., no capture, flaring, energy recovery) are statewide averages and were used in the analysis.

## 4.8.4.2 Thresholds of Significance

The ~~State~~ CEQA Guidelines, Appendix G (14 California Code of Regulations 15000 et seq.), identify sample criteria for determining the significance of project-related GHG emissions. A project impact

would be considered potentially significant if construction or operation of the project would cause either of the following:

1. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment; or
2. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

Section 15064.4(b) of the ~~State~~ CEQA Guidelines further states that when assessing the significance of impacts from project-related GHG emissions, a lead agency should consider:

1. The extent to which a project may increase or reduce GHG emissions as compared to the existing environmental setting;
2. Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project; and
3. The extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of GHG emissions. Such requirements must be "CEQA-qualified"—i.e., adopted by the relevant public agency through a public review process, and the lead agency must include substantial evidence linking statewide goals, strategies, and plans to the project's findings.

The extent to which a project increases or decreases GHG emissions in the existing environmental setting should be estimated in accordance with Section 15064.4, *Determining the Significance of Impacts from Greenhouse Gas Emissions*, of the ~~State~~ CEQA Guidelines. The ~~State~~ CEQA Guidelines indicate that when calculating GHG emissions resulting from a project, lead agencies shall make a good-faith effort based on scientific and factual data (Section 15064.4 (a)), and lead agencies have discretion to select the model or methodology deemed most appropriate for enabling decision makers to intelligently assess the project's incremental contribution to climate change (Section 15064.4 (c)).

The ~~State~~ CEQA Guidelines do not indicate an amount of GHG emissions that constitutes a significant impact on the environment. Instead, they authorize the lead agency to consider thresholds of significance previously adopted or recommended by other public agencies or recommended by experts, provided the decision of the lead agency to adopt such thresholds is supported by substantial evidence (~~State~~ CEQA Guidelines Sections 15064.4(a) and 15064.7(c)). Several agencies throughout the ~~s~~State have drafted and/or adopted numerical threshold approaches and guidelines for analyzing the significance of project-related GHG emissions. However, no numerical thresholds have been formally adopted by an air district or lead agency for use in the San Diego region.

In the absence of an adopted numerical threshold for the project region, the significance of the project-related GHG emissions can be determined by evaluating the project's compliance with regulations or requirements adopted to implement statewide, regional, or local plans for the reduction or mitigation of GHG emissions. The ~~s~~State's 2030 target (reduce GHG emissions to 40% below 1990 levels by 2030) has been codified in law through SB 32 and the 2017 Scoping Plan (CARB 2017b). Therefore, 2030 marks the next statutory statewide milestone target applicable to the project.

The County's 2018 CAP quantified baseline and projected future GHG emissions from activities within the ~~county~~unincorporated area (where the project is located) and proposed County-specific

measures and strategies to reduce GHG emissions in accordance with the 2030 statewide GHG reduction target adopted in SB 32. However, as previously discussed under Section 4.8.3.4, *Local,* given the County ~~of San Diego~~ Board of Supervisors' vote to rescind the 2018 CAP, it is no longer a "CEQA-qualified" document as defined by Sections 15183.5(b) and 15064.4 of the ~~State~~ CEQA Guidelines and cannot be used to determine significance of project-related GHG emission impacts.

In this case, significance of impacts related to project-generated GHG emissions can be determined through an assessment of compliance with statewide regulations and requirements adopted to implement GHG reduction plans that align with the SB 32 2030 target, such as CARB's 2017 Scoping Plan. The specific threshold approach used to assess the significance of the project's GHG emission impacts is informed by the guidance summarized here and is discussed in further detail in the following section.

## Threshold Approach

The project would generate GHG emissions from construction and operations activities. Construction would generate GHG emissions from use of off-road equipment and employee and truck vehicle trips between 2022 and 2024. Operations would generate GHG emissions from mobile vehicle trips to and from the project site, electricity consumption, water and wastewater conveyance, solid waste, and landscaping equipment. Given that the County, CARB, and SDAPCD have not established a numerical threshold of significance for GHG emissions relevant to park uses within the ~~county~~unincorporated area, the approach for evaluating the project's impacts related to GHG emissions relies on compliance with statewide plans adopted for the purpose of reducing and/or mitigating GHG emissions. The compliance evaluation is the sole basis for determining the significance of the project's GHG-related impacts on the environment.

GHG emissions resulting from construction and operation of the project were estimated in accordance with Section 15064.4 of the ~~State~~ CEQA Guidelines. The severity of potential impacts from project-related GHG emissions was assessed based on the total increase above the existing environmental setting. The GHG emissions associated with implementation of the project were estimated using industry standard and accepted software tools, techniques, and emissions factors, as described under Section 4.8.4.1, *Methodology,* above. Estimation of emissions is for informational purposes only, for comparison with existing environmental conditions. The significance of the project's GHG impacts is not based on the quantitative amount of GHG emissions from implementation, and instead is based on the project's compliance with statewide GHG reduction regulations and requirements, which is assessed qualitatively.

Recent guidance on GHG-reduction strategies for operational GHG emissions have been provided at the ~~s~~State level through the 2017 Scoping Plan, OPR, and CARB. The 2017 Scoping Plan outlines the framework and strategies the ~~s~~State will take to achieve the 2030 emission-reduction targets established by SB 32. The 2017 Scoping Plan update proposes to meet the 2030 goal by accelerating the focus on zero and near-zero technologies for moving freight, continued investment in renewables, greater use of low-carbon fuels including electricity and hydrogen, stronger efforts to reduce emissions of SLCPs, further efforts to create walkable communities with expanded mass transit and other alternatives to traveling by car, continuing the ~~"~~Cap-and-Trade~~"~~ program,~~-~~ and ensuring that natural lands become carbon sinks to provide additional emissions reductions and flexibility in meeting the target (CARB 2017b). Furthermore, OPR guidance specifies that a "land use development project that produces low VMT, achieves applicable building energy-efficiency standards, uses no natural gas or other fossil fuels, and includes Energy Star appliances where

available, may be able to demonstrate a less-than-significant greenhouse gas impact associated with project operation" (OPR 2018b).

As discussed in Section 4.8.3.2, *State*, CARB's 2017 Scoping Plan emphasizes the importance of reducing VMT by on-road vehicles to lower mobile-source GHG emissions in pursuit of achieving statewide reduction targets. The 2017 Scoping Plan recommends a 15% reduction in total light-duty VMT from the business-as-usual scenario in 2050, and updated CARB guidance found that projects with total VMT per capita that is 14.3% lower than existing conditions would be consistent with the ~~s~~State's long-term GHG reduction goals (CARB 2019). At the local level, VMT guidance specific to the ~~County~~unincorporated area is provided in the *County of San Diego Transportation Study Guidelines* (County TSG) (County of San Diego ~~2020~~ 2022). The County TSG was adopted to assist with significance determinations for transportation impacts in accordance with SB 743, which established VMT as the most appropriate metric for transportation impacts to align local environmental review under CEQA with California's long-term GHG reduction goals.

If the project is compliant with or exceeds the regulations outlined in the 2017 Scoping Plan and adopted by CARB or other ~~s~~State agencies, the project could appropriately rely on their use as showing compliance with performance-based standards adopted to fulfill the statewide goal for reducing GHG emissions. The project's compliance with regulatory programs adopted by CARB and other ~~s~~State agencies is therefore used to evaluate the significance of the project's GHG emissions.

## 4.8.4.3 Project Impacts and Mitigation Measures

***Threshold 1: The project would ~~not~~ generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.***

### County Park and Trails and Open Space~~/Preserve~~

#### Impact Discussion

The GHG emissions generated by construction and operation of the project were estimated for informational purposes to provide context for the potential change in GHG emissions compared to existing conditions. As discussed in Chapter 2, *Environmental Setting*, the project site is currently undeveloped and, although it is closed to the public, it is ~~being~~ used as unofficial recreational open space.

##### Construction

Construction of the project would result in temporary generation of GHG emissions related to off-road equipment use and on-road vehicle operations. As mentioned previously, GHG emissions are measured exclusively as cumulative impacts; therefore, the project's construction emissions are considered part of the total GHG emissions for the project lifecycle, which also include GHG emissions during operations. The project's construction emissions are amortized over the lifetime of the project (30 years) and the resulting annual emissions are combined with the project's annual operational GHG emissions. Table 4.8-3 shows the project's construction-related emissions.

**Table 4.8-3. Estimated Short-term Construction GHG Emissions**

| Construction Year | Estimated GHG Emissions ($MTCO_2e$)[1] |
|---|---|
| 2022 | 285 |
| 2023 | 798 |
| 2024 | 55 |
| **Total Construction Emissions** | **1,137** |
| *Annual Construction Emissions (Amortized over 30 years)* | 38 |

Source: See Appendix C for detailed input parameters and modeling results.
[1] Totals may not add up due to rounding.

The project's construction activities would result in the generation of GHG emissions that could directly or indirectly have a significant impact on the environment because the project would not comply with the 2017 Scoping Plan. Impacts would be potentially significant for construction.

### Operations

Operation of the project would result in mobile-source GHG emissions associated with vehicle trips to and from the project site (i.e., project-generated VMT), landscaping equipment, electricity consumption, water consumption, and the generation of wastewater and solid waste. Annual GHG emissions associated with operation of project are summarized Table 4.8-4. As shown in Table 4.8-4, the project's annual operational emissions are estimated to be 502 $MTCO_2e$ in opening year 2024.

**Table 4.8-4. Annual Operational GHG Emissions**

| Source | Annual GHG Emissions ($MTCO_2e$)[1] |
|---|---|
| Area | <1 |
| Electricity | 23 |
| Mobile | 383 |
| Waste | 22 |
| Water | 35 |
| *Amortized Construction (See Table 4.8-3)* | *38* |
| Total Project Emissions | 502 |

Source: See Appendix C for detailed input parameters and modeling results.
[1] Totals may not add up due to rounding.

As discussed in Section 4.8.4.2, *Thresholds of Significance,* the threshold for determining significance of GHG emission impacts from the project is compliance with statewide plans adopted for the purpose of reducing and/or mitigating GHG emissions. At the ~~s~~State level, the 2017 Scoping Plan outlines the framework and strategies the ~~s~~State will take to achieve its emission reduction targets. The 2017 Scoping Plan Update proposes to meet the 2030 goal by accelerating the focus on zero and near-zero technologies for moving freight, continued investment in renewables, greater use of low-carbon fuels including electricity and hydrogen, stronger efforts to reduce emissions of SLCPs, further efforts to create walkable communities with expanded mass transit and other alternatives to traveling by car, continuing the cap-and-trade program, and ensuring that natural lands become carbon sinks to provide additional emissions reductions and flexibility in meeting the target (CARB 2017b).

There are several statewide programs included in the 2017 Scoping Plan strategy that require no action at the project level and would benefit project-related emission sources. For example, the Scoping Plan incorporates SB 350, which extends the RPS to a 50% target by 2030 while doubling the energy efficiency savings expected statewide (which was further expended to 100% carbon-free energy production by 2045 after the SB 32 Scoping Plan was adopted). Although the RPS requirements are only applicable to utility companies, the project would be consistent with goals of reducing GHG emissions from electricity by installing solar PV panels on six overhead structures in the parking lot, which would generate renewable electricity for project uses, and the project's outdoor lighting would be solar-powered. Overall, the project would reduce its electricity consumption, thus reducing GHG emissions.

CARB expanded the LCFS, aiming to achieve a 20% reduction in the carbon intensity of transportation fuels by 2030 (and maintain 20% beyond 2030). Furthermore, the Mobile Source Strategy aims to support the transition to 1.5 million zero-emission vehicles (plug-in hybrid electric, battery-electric, and hydrogen fuel cell) by 2025 and 4.2 million by 2030, while also ramping up GHG stringency for all light-duty vehicles. The Mobile Source Strategy would benefit emissions from project-related transportation as the statewide vehicle fleet becomes more efficient and electrified. These statewide programs will be implemented over time, resulting in reductions in mobile GHG emissions over the 30-year project life. Furthermore, the project would not consume natural gas during operations, which is consistent with OPR guidance and the 2017 Scoping Plan.

Project operations would result in mobile-source GHG emissions at the project site associated with visitor vehicle trips (i.e., project-generated VMT). As discussed in Section 4.8.4.2, *Threshold Approach*, SB 743 established VMT as the most appropriate metric for transportation impacts to align environmental CEQA review with California's long-term GHG reduction goals. The County TSG requires all projects within the unincorporated ~~San Diego County~~area undergo a screening process to ensure project-related VMT is consistent with statewide goals. Based on Section 3.3 of the County TSG, there are several categories based on project characteristics and/or locations that would deem a VMT impact less than significant. Chen Ryan Associates conducted the VMT analysis for the project (Appendix H). The VMT screening analysis concluded that the project fell under the "local serving public facilities and other uses [local parks and trailheads]" category. Based on the County TSG, this category met the screening criteria and would be exempt from additional VMT analysis and is assumed to have a less-than-significant VMT impact. Because the project would result in a less-than-significant impact for VMT, the project's mobile-source GHG emissions would not conflict ~~withow the project h~~with SB 743. Because reducing GHG emissions from passenger vehicles is one of the objectives of SB 743 and one of the overarching strategies of the 2017 Scoping Plan, operation of the project would not conflict with the statewide GHG target for 2030 mandated by SB 32. Please refer to Section 4.17, *Transportation and Circulation*, for additional information on the project-related VMT analysis.

Moreover, the project would incorporate a variety of features that would reduce GHG emissions consistent with statewide programs. The project would provide adequate bicycle parking for park visitors using the bike ~~park~~skills area and trails and would provide sufficient receptacles for trash and recycling.

The project would incorporate onsite electricity generation from the solar PV array and solar-powered outdoor lighting, native plants in its landscaping and a synthetic turf baseball field, and two electric vehicle charging stations; and the project would not consume natural gas. Furthermore, the VMT screening analysis indicated the project met the VMT screening criteria and would have a less-

than-significant VMT impact. Because the project would not have a significant VMT impact, the project's mobile-source GHG emissions would not conflict with SB 743 where reducing GHG emissions from passenger vehicles is one of the objectives of SB 743 and one of the overarching strategies of the 2017 Scoping Plan. Overall, the project would be consistent with applicable polices from the 2017 Scoping Plan and regulatory programs. Therefore, GHG emissions from operation of the project would have a less-than-significant impact on the environment.

### Impact Determination

**Impact-GHG-1: Generation of GHG Emissions that May Have a Significant Impact on the Environment.** The project's construction activities would result in the generation of GHG emissions that could directly or indirectly have a significant impact on the environment because the project would not comply with the 2017 Scoping Plan. Impacts would be potentially significant for construction. GHG emissions from operation of the project would have a less-than-significant impact on the environment.

### Mitigation Measures

**MM-GHG-1: Implement Construction Best Management Practices.** The County shall ensure implementation of the following measures during project construction:

- Require equipment to be maintained in good tune and to reduce excessive idling time.
- Utilize alternative fueled equipment and vehicles, such as renewable diesel, renewable natural gas, compressed natural gas, or electric.
- Require older equipment be retrofitted with advanced engine controls, such as diesel particulate filters, selective catalytic reduction, or cooled exhaust gas recirculation.

### Level of Significance After Mitigation

**Impact-GHG-1** would be reduced to a less-than-significant level after implementation of **MM-GHG-1**, which would ensure compliance with the 2017 Scoping Plan. Therefore, construction impacts would be less than significant with mitigation. GHG emissions from operation would remain less than significant.

***Threshold 2: The project would ~~not~~ conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs.***

## County Park and Trails and Open Space~~/Preserve~~

### Impact Discussion

As discussed previously, CARB's 2017 Scoping Plan provides the framework for achieving the statewide GHG reduction target established by SB 32 of 40% below 1990 levels by 2030. In this case, the 2017 Scoping Plan is the most relevant plan adopted for the purpose of reducing emissions of GHGs within the ~~county.~~unincorporated area. Compliance with the applicable regulations or requirements adopted to implement the 2017 Scoping Plan would ensure GHG emissions resulting from implementation of the project are less than significant.

### Construction

~~The~~As discussed previously, the project's construction activities would result in the generation of GHG emissions and would conflict with the 2017 Scoping Plan. Impacts would be potentially significant for construction.

### Operation

The impact discussion under Threshold 1 above addresses the project's compliance with the relevant measures and regulatory programs adopted by CARB and other ~~s~~State agencies to reduce GHG emissions in accordance with SB 32 and the 2017 Scoping Plan. Many of the programs included in the 2017 Scoping Plan would result in the reduction of project-related GHG emissions with no action required at the project level. These programs include SB 350, LCFS, and the Mobile Source Strategy. These programs would benefit GHG emission reductions through increased energy efficiency and renewable energy production, reduction in carbon intensity of transportation fuels, and the accelerated efficiency and electrification of the statewide vehicle fleet, respectively. Implementation of these statewide programs would result in a reduction of operational GHG emissions over the 30-year project lifetime.

The 2017 Scoping Plan emphasizes the importance of reducing VMT to achieve mobile-source GHG emission reductions necessary to reach statewide climate goals. As detailed in Section 4.17, *Transportation and Circulation,* the project's VMT impact was deemed less than significant. Based on this, the project's mobile-source GHG emissions would not conflict with SB 743. Because reducing GHG emissions from passenger vehicles is one of the objectives of SB 743 and one of the overarching strategies of the 2017 Scoping Plan, operation of the project would not conflict with the statewide GHG target for 2030 mandated by SB 32.

## Impact Determination

**Impact-GHG-2: Conflict With an Applicable Plan, Policy, or Regulation.** The project's construction activities would potentially conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. Impacts would be potentially significant for construction. GHG emissions from operation of the project would have a less-than-significant impact on the environment.

## Mitigation Measures

**MM-GHG-1: Implement Construction Best Management Practices.** The County shall ensure implementation of the following measures during project construction:

- Require equipment to be maintained in good tune and to reduce excessive idling time.
- Utilize alternative fueled equipment and vehicles, such as renewable diesel, renewable natural gas, compressed natural gas, or electric.
- Require older equipment be retrofitted with advanced engine controls, such as diesel particulate filters, selective catalytic reduction, or cooled exhaust gas recirculation.

### Level of Significance After Mitigation

**Impact-GHG-2** would be reduced to a less-than-significant level after implementation of **MM-GHG-1**, which would ensure consistency with SB 32 and the 2017 Scoping Plan. Therefore, impacts would be less than significant with mitigation.

## 4.8.5 Summary of Significant Impacts

**Table 4.8-5. Summary of Significant Greenhouse Gas Emissions and Climate Change Impacts and Mitigation Measures**

| Summary of Potentially Significant Impact(s) | Summary of Mitigation Measure(s) | Level of Significance After Mitigation | Rationale for Finding After Mitigation |
|---|---|---|---|
| **Impact-GHG-1:** Generation of GHG Emissions that May Have a Significant Impact on the Environment | **MM-GHG-1: Implement Construction Best Management Practices** | Less than Significant | **Impact-GHG-1** would be reduced to a less-than-significant level after implementation of **MM-GHG-1**, which would ensure compliance with the 2017 Scoping Plan. Therefore, construction impacts would be less than significant with mitigation. GHG emissions from operation would remain less than significant. |
| **Impact-GHG-2:** Conflict With an Applicable Plan, Policy, or Regulation | **MM-GHG-1: Implement Construction Best Management Practices** | Less than Significant | **Impact-GHG-2** would be reduced to a less-than-significant level after implementation of **MM-GHG-1**, which would ensure consistency with SB 32 and the 2017 Scoping Plan. |

Section 4.9
# Hazards and Hazardous Materials

## 4.9.1 Overview

This section describes the environmental and regulatory settings for hazards and hazardous materials at the project site. It also describes impacts on hazards and hazardous materials that would result from implementation of the project.

A hazardous material is any substance that, because of its quantity, concentration, or physical or chemical properties, may pose a hazard to human health and the environment. Under California Code of Regulations (CCR) Title 22, the term *hazardous substance* refers to both hazardous materials and hazardous wastes. Both are classified according to four properties: (1) toxicity, (2) ignitability, (3) corrosiveness, and/or (4) reactivity (CCR Title 22, Chapter 11). A hazardous material is defined in ~~CCR Title 22~~Health and Safety Code Section 25501 as:

> ~~[a] substance or combination of substances which~~(n)(1) "Hazardous material" means a material listed in paragraph (2) that, because of its quantity, concentration, or physical~~,~~ or chemical ~~or infectious~~ characteristics, ~~may either (1) cause, or significantly contribute to, an increase in mortality or an increase in serious irreversible, or incapacitating reversible, illness; or (2) pose~~poses a ~~substantial~~significant present or potential hazard to human health ~~or~~and safety or to the environment ~~when improperly treated, stored, transported~~if released into the workplace or the environment, or a material specified in an ordinance adopted pursuant to paragraph (3).
>
> (2) Hazardous materials include all of the following:
>
> (A) A substance or product for which the manufacturer or producer is required to prepare a material safety data sheet pursuant to the Hazardous Substances Information and Training Act (Chapter 2.5 (commencing with Section 6360) of Part 1 of Division 5 of the Labor Code) or pursuant to any applicable federal law or ~~disposed of or otherwise managed (CCR~~regulation.
>
> (B) A substance listed as a radioactive material in Appendix B of Part 30 (commencing with Section 30.1) of Title ~~22 § 66260.~~10~~).~~ of the Code of Federal Regulations, as maintained and updated by the United States Nuclear Regulatory Commission.
>
> (C) A substance listed pursuant to Title 49 of the Code of Federal Regulations.
>
> (D) A substance listed in Section 339 of Title 8 of the California Code of Regulations.
>
> (E) A material listed as an extremely hazardous waste, as defined in Section 25115, a hazardous waste, as defined in Section 25117, or a hazardous substance, as defined in Section 25316.

Hazardous materials in various forms can cause death, serious injury, long-lasting health effects, and damage to buildings, homes, and other property. Hazards to human health and the environment can occur during production, storage, transportation, use, or disposal of hazardous materials.

## 4.9.2 Existing Conditions

### 4.9.2.1 Hazardous Materials

The hazardous materials information in this section is based on a review of the Regional Water Quality Control Board (RWQCB) GeoTracker and Department of Toxic Substances Control (DTSC)

EnviroStor online databases. The database review identified the following hazardous materials site within the project footprint, High School No 12, Study Area B, Wright's Field, at 2480 South Grade Road in Alpine, California. In 2008, the Grossmont Union High School District evaluated the project site, which was one of three locations considered for construction of a new high school. A Phase I Environmental Site Assessment (ESA) was prepared as part of that evaluation. A March 20, 2008, letter from DTSC to the Grossmont Union High School District concluded that there were no hazardous material releases or presence of naturally occurring hazardous materials. The letter concurred with the Phase I ESA's conclusion that further investigation at the project site was not required.

There are no other listed hazardous materials sites within the project footprint or within a 0.25-mile radius from the project site.

### 4.9.2.2 Proximity to Schools

Joan MacQueen Middle School is located approximately 0.4-mile west of the project site at 2001 Tavern Rd, Alpine, California. Boulder Oaks Elementary School is located approximately 0.7-mile west of the project site at 2320 Tavern Rd.

### 4.9.2.3 Proximity to Airports and Airstrips

The nearest airport to the project site is On the Rocks Airport (1CA6), which is approximately 4.5 miles southeast of the project site (AirNav.com 2021).

### 4.9.2.4 Emergency Response Plan

The County of San Diego (County) Office of Emergency Services (OES) coordinates the County's overall response to disasters. OES notifies appropriate agencies when a disaster occurs, coordinates with responding agencies, ensures that resources are available and mobilized, plans for disaster response and recovery, and develops preparedness materials for the public. OES acts as the staff to the Unified Disaster Council (UDC), which was established under a joint powers agreement among all 18 incorporated cities and the County. The UDC coordinates plans and programs countywide to ensure the protection of life and property.

### 4.9.2.5 Wildfire Hazards

The California Department of Forestry and Fire Protection (CAL FIRE) has mapped areas with significant fire hazards in ~~the county~~San Diego County through its Fire and Resource Assessment Program. Specifically, CAL FIRE defines and maps Fire Hazard Severity Zones (FHSZs) to identify the potential fire hazard severity expected in different areas of the ~~s~~State, as required by Public Resources Code (PRC) Sections 4201–4205. FHSZ determinations are based on an area's vegetation, topography (slope), weather (including winds), crown fire potential, and ember production and movement potential. FHSZs are classified as Very High, High, or Moderate in areas of California where the ~~s~~State is responsible for fire protection (i.e., State Responsibility Areas [SRAs]) (CAL FIRE 2007).

According to CAL FIRE's "Fire Hazard Severity Zones in SRA" map, the project site is in a Very High Fire Hazard Severity Zone (VHFHSZ) (CAL FIRE 2007). In response to this designation, the San Diego

County Fire Protection District (FPD)/CAL FIRE and the Alpine FPD enforce robust fire prevention regulations in the project area.

A Fire and Emergency Operation Assessment (FEOA) was prepared to identify wildfire risks at the project site (Rohde and Associates 2021); the following information in this section is from the FEOA. The FEOA noted that the project site historically has been subject to wildfires. -The FEOA identified the following site-specific wildfire and ignition risks at the project site:

- Proximity to South Grade Road, a known location with human related fire ignition factors;
- Adjacency of the site to significant human activity, including homes and ranches;
- Robust public usage of the site for both dispersed and organized recreation;
- Location of the park site with respect to historical major wildfire corridors;
- Heavy fuel concentrations on some County/Back Country Land Trust (BCLT) lands;
- Current off-road parking and occasional vehicle trespass; and
- Potential increase in demand for local public safety resources due to developed park use.

For additional information on wildfire hazards, as well as prevention measures, please see Section 4.20, *Wildfire*.

# 4.9.3 Applicable Laws and Regulations

## 4.9.3.1 Federal

### Federal Toxic Substances Control Act/Resource Conservation and Recovery Act/Hazardous and Solid Waste Act

The federal Toxic Substances Control Act (TSCA) of 1976 and the Resource Conservation and Recovery Act (RCRA) of 1976 established a U.S. Environmental Protection Agency– (U.S. EPA-) administered program to regulate the generation, transport, treatment, storage, and disposal of hazardous waste. TSCA authorized U.S. EPA to secure information on all new and existing chemical substances and control any substances determined to cause unreasonable risks to public health or the environment. The RCRA was amended in 1984 by the Hazardous and Solid Waste Act, which affirmed and extended the "cradle to grave" system of regulating hazardous wastes.

### Comprehensive Environmental Response, Compensation, and Liability Act/ Superfund Amendments and Reauthorization Act

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), commonly known as "Superfund," was enacted by Congress on December 11, 1980. This law (42 United States Code [USC] 103) provides broad federal authority to respond directly to releases or threatened releases of hazardous substances that may endanger public health or the environment. CERCLA establishes requirements concerning closed and abandoned hazardous waste sites, provides for liability of persons responsible for releases of hazardous waste at these sites, and establishes a trust fund to provide for cleanup when no responsible party can be identified. CERCLA also enabled the revision of the National Contingency Plan (NCP). The NCP (Code of Federal Regulations [CFR] Title

40, Part 300) provides the guidelines and procedures needed to respond to releases and threatened releases of hazardous substances, pollutants, or contaminants. The NCP also established the National Priorities List. CERCLA was amended by the Superfund Amendments and Reauthorization Act on October 17, 1986.

### The Emergency Planning and Community-Right-to-Know Act

The Emergency Planning and Community Right-to-Know Act (EPCRA) of 1986 was created to help communities plan for chemical emergencies and respond to concerns regarding environmental and safety hazards resulting from the storage and handling of toxic chemicals. The EPCRA requires the reporting of storage, use, and releases of hazardous substances to federal, state, and local governments.

### Section 402 of the Clean Water Act: National Pollutant Discharge Elimination System Permits

Clean Water Act Section 402 establishes the National Pollutant Discharge Elimination System (NPDES), a permitting system for discharges of pollutants, except dredged or fill material, into waters of the U.S. In California, Regional Water Quality Control Boards (RWQCB) administer the program. Section 402(p) requires permits for discharges of stormwater from industrial/construction and municipal separate storm sewer systems (MS4s). In addition, construction sites on 1 acre of land or more are required to obtain an NPDES permit.

### Occupational Safety and Health Administration

The mission of the Occupational Safety and Health Administration (OSHA) is to ensure the safety and health of American workers by setting and enforcing standards; providing training, outreach, and education; establishing partnerships; and encouraging continual improvement in workplace safety and health. OSHA establishes and enforces protective standards and reaches out to employers and employees through technical assistance and consultation programs. OSHA standards are listed in 29 CFR 1910.

### Department of Transportation Hazardous Materials Regulations (49 CFR 100–185)

U.S. Department of Transportation (DOT) hazardous materials regulations cover all aspects of hazardous materials packaging, handling, and transport. These include Parts 107 (Hazard Materials Program), 130 (Oil Spill Prevention and Response), 172 (Emergency Response), 173 (Packaging Requirements), 174 (Rail Transportation), 176 (Vessel Transportation), 177 (Highway Transportation), 178 (Packaging Specifications), and 180 (Packaging Maintenance).

## 4.9.3.2 State

### Department of Toxic Substances Control Regulations

DTSC regulates hazardous waste, primarily under the authority of the federal RCRA and the California Health and Safety Code (H&SC) (primarily Division 20, Chapters 6.5 through 10.6, and CCR Title 22, Division 4.5). Other laws that affect hazardous waste are specific to handling, storage, transportation, disposal, treatment, reduction, cleanup, and emergency planning. CCR Title 22,

Division 4.5, Chapter 11, Article 3, highlights the procedures for identifying hazardous waste into these 4 categories: ignitable, corrosive, reactive, and toxic. CCR Title 22, Division 4.5, Chapter 11, Article 5, categorizes hazardous waste into acutely hazardous waste, extremely hazardous waste, non-RCRA hazardous waste, RCRA hazardous waste, special waste, and universal waste. CCR Title 22 also underscores the guidelines for managing hazardous waste, which pertain to storage, housekeeping, recordkeeping, and inspecting.

DTSC's Environmental Health Standards for the Management of Hazardous Waste is included in CCR Title 22, Division 4.5. All hazardous waste generators must comply with the guidelines, as enforced by DTSC, for identifying, labeling, accumulating, preparing, and preventing outcomes related to hazardous waste.

## Cortese List

Government Code Section 65962.5 requires the California Environmental Protection Agency (CalEPA) to develop a list of sites with hazardous waste and substances (Cortese List). This includes DTSC- and H&SC-identified hazardous waste sites; Department of Health Services-listed contaminated public drinking water wells; SWRCB-listed underground storage tank (UST) leaks, solid waste facilities, and hazardous waste sites; and other sites as designated by various other ~~s~~State and local governments. Government Code Section 65962.5 requires the Cortese List to be updated at least annually. The Cortese List complies with the CEQA requirements by providing information about the location of hazardous material releases.

## Porter-Cologne Water Quality Control Act

The Porter-Cologne Water Quality Control Act (Porter-Cologne) restricts the disposal of waste or any other activity that may degrade waters of the ~~s~~State. Porter-Cologne requires the cleanup of wastes that are below hazardous concentrations but capable of affecting the quality of surface water and groundwater (§ 13002). Porter-Cologne established nine Regional and State Water Boards, which are primarily responsible for protecting water quality in California. Regional Water Boards regulate discharges by issuing permits through NPDES for waste discharge requirements for nonpoint-source discharges. Anyone discharging materials or proposing to discharge materials that could affect water quality must file a report of waste discharge, unless the discharge would be into a community sewer system.

## Hazardous Waste Control Act (§ 25100 et seq.)

DTSC is responsible for enforcing the Hazardous Waste Control Act (H&SC § 25100 *et seq*.), which creates the framework under which hazardous wastes are managed in California. The law provides for the development of a ~~s~~State hazardous waste program that administers and implements the provisions of the federal RCRA cradle-to-grave waste management system in California. It also provides for the designation of California-only hazardous waste and development of standards that are equal to or, in some cases, more stringent, than federal requirements.

## Unified Hazardous Waste and Hazardous Materials Management Regulatory Program

The Unified Hazardous Waste and Hazardous Materials Management Regulatory Program (Unified Program) (H&SC Chapter 6.11 §§ 25404–25404.9) provides authority to the Certified Unified

Program Agency (CUPA). The County of San Diego, Department of Environmental Health and Quality, Hazardous Materials Division (HMD), has been the CUPA for San Diego County since 1996 (County of San Diego 2021). The Unified Program consolidates six ~~s~~State-regulated environmental programs into one program under CalEPA. The six programs are:

- Aboveground Petroleum Storage Act (APSA) Program,
- California Accidental Release Prevention (CalARP) Program,
- Hazardous Materials Business Plan (HMBP) Program,
- Hazardous Materials Management and Inventory Program,
- Hazardous Waste and Hazardous Waste Treatment Program, and
- UST Program.

## California Code of Regulations, Title 8—Industrial Relations

Occupational safety standards exist in federal and state laws to minimize worker safety risks from both physical and chemical hazards in the workplace. The California Division of Occupational Safety and Health (Cal/OSHA) and the federal OSHA are the agencies responsible for assuring safety in the workplace. Cal/OSHA assumes primary responsibility for developing and enforcing standards for safe workplaces and work practices. These standards apply to construction activities.

## California Labor Code (Division 5, Parts 1, 6, 7, and 7.5)

The California Labor Code is a collection of regulations that include regulation of the workplace to ensure appropriate training on the use and handling of hazardous materials and operation of equipment and machines that use, store, transport, or dispose of hazardous materials. Division 5, Part 1, Chapter 2.5, ensures that employees who oversee handling hazardous materials are appropriately trained and informed with respect to the materials they handle. Division 5, Part 7, ensures that employees who work with volatile flammable liquids are outfitted with appropriate safety gear and clothing.

## California Building Code and Fire Code

The California Fire Code (CFC), CCR Chapter 9, Title 24, was created by the California Building Standards Commission and based on the International Code Council-created International Fire Code. It is the primary means for authorizing and enforcing procedures and mechanisms to ensure the safe handling and storage of any substance that may pose a threat to public health and safety. The CFC regulates the use, handling, and storage of hazardous materials at fixed facilities. The CFC and the California Building Code (CBC) use a hazard classification system to determine what protective measures are required to promote fire and protect life safety. These measures involve construction standards, property line separation, and specialized equipment. To ensure that the safety measures are met, the CFC employs a permit system, based on hazard classification. The CFC is updated every 3 years.

The CFC includes requirements for building construction and vegetation management within designated Wildlife Urban Interface (WUI) areas. In such areas, all new buildings must comply with the CBC, which defines building construction requirements to reduce wildfire exposure. In addition, buildings within the WUI must comply with California laws and regulations that require

maintenance of a "defensible space" of 100 feet from structures (PRC § 4291; CCR § 1299.03). In particular, Chapter 7A establishes minimum standards for the protection of life and property by increasing the ability of a building in an FHSZ and an SRA or WUI fire area to resist the intrusion of flames or burning embers projected by a vegetation fire. Therefore, the CFC contributes to a systematic reduction in conflagration losses.

# 4.9.3.3 Regional

## San Diego County Code Title 6, Division 8

San Diego County Code of Regulatory Ordinances Title 6, Division 8, Chapters 8 through 11, establishes the HMD as the local CUPA. The HMD, which is responsible for public health, safety, and the environment, inspects businesses or facilities that handle or store hazardous materials, generate hazardous waste, generate medical waste, and own or operate USTs. HMD also administers the California Accidental Release Prevention Program and the Aboveground Petroleum Storage Act Program and provides specialized instruction to small businesses through its Pollution Prevention Specialist. HMD has the authority under ~~s~~State law to inspect facilities with hazardous materials or hazardous waste and, in cases where a facility is in noncompliance with the applicable ~~s~~State law or regulations, take enforcement action.

Projects are required to notify HMD regarding the use, handling, release (i.e., spills), storage, or disposal of hazardous materials and hazardous waste in accordance with existing ~~s~~State law and County ordinance. The notification is the initial step in the HMD permitting process, which requires businesses to obtain and maintain a Unified Program Facility Permit if they handle or store hazardous materials, are part of the California Accidental Release Prevention Program, generate or treat hazardous wastes or medical waste, store at least 1,320 gallons of aboveground petroleum, or own or operate USTs. The applicant requesting a permit must use the State of California Environmental Reporting System and submit the online request within 30 days.

If a building permit is required, California Government Code Section 65850.2 prohibits building departments from issuing a final Certificate of Occupancy to businesses or facilities that handle hazards materials unless they have submitted and met the requirements of a hazardous materials business plan. The plan contains detailed information on the storage of hazardous materials at regulated facilities and serves to prevent or minimize damage to public health, safety, and the environment from a release or threatened release of a hazardous material. The hazardous materials business plan also provides emergency response personnel with adequate information to help them better prepare and respond to chemical-related incidents at regulated facilities.

## San Diego County Emergency Operations Plan

The Operational Area Emergency Operations Plan describes a comprehensive emergency management system that provides for a planned response to situations associated with natural disasters, technological incidents, terrorism, and nuclear-related incidents. It delineates operational concepts related to various emergency situations, identifies components of the Emergency Management Organization, and describes overall responsibilities for protecting life and property and ensuring the overall well-being of the population. The plan also identifies sources of outside support which might be provided (through mutual aid and specific statutory authorities) by other jurisdictions, ~~s~~State and federal agencies, and the private sector.

The plan cites authorities and references to support the plan, which has five objectives:

1. Provide a system for the effective management of emergency situations;
2. Identify lines of authority and relationships;
3. Assign tasks and responsibilities;
4. Ensure adequate maintenance of facilities, services, and resources; and
5. Provide a framework for adequate resources for recovery operations.

## County of San Diego Multi-Jurisdictional Hazard Mitigation Plan

The Multi-Jurisdictional Hazard Mitigation Plan includes an overview of the risk-assessment process, identifies hazards present in the jurisdiction, and provides hazard profiles and vulnerability assessments. The plan also identifies goals, objectives, and actions for each jurisdiction in ~~the~~San Diego County, including all cities and the County ~~unincorporated areas.~~. For the ~~unincorporated portions of the County 13~~County's hazard mitigation plan, 4 goals have been developed ~~for their hazard mitigation plans~~:

~~1. Promote disaster-resistant future development.~~

~~2. Increase public understanding and support for effective hazard mitigation,~~

1. ~~Build and support~~Foster safe, sustainable, and thriving environments,
2. Reduce the possibility of damages and losses to existing assets (such as people, critical facilities/infrastructures, and county-owned facilities,
3. Enhance local capacity and commitment to become less vulnerable to all hazards~~,~~ and

~~4. Enhance hazard mitigation coordination and communication with federal, state, local, and tribal governments.~~

~~The remaining nine goals reduce the potential for damage and loss involving existing assets—particularly people, critical facilities and infrastructure, and County-owned facilities—due to:~~

~~5. Dam failure,~~

~~6. Earthquake and liquefaction,~~

~~7. Coastal storms/erosion/tsunami,~~

~~8. Landslides,~~

~~9. Floods,~~

~~10. Structural fires/wildfires,~~

~~11. Extreme weather and drought,~~

~~12. Manmade hazards, and~~

~~13. Hazardous materials releases.~~

4. Promote regional culture of hazard understanding, support, and preparedness.

These 4 goals have 23 corresponding prioritized actions which have been identified to reduce hazards and improve community safety. Prioritized actions include but are not limited to:

- Limit Development in Floodplains and Other Hazardous Areas: County Department of Public Works (DPW) will continue to limit development of park structures and facilities in floodplains and other hazardous areas.
- Invasive and Noxious Weed Control (Vegetation Management): The County Department of Agriculture, Weights & Measures will continue to promote cooperative vegetation management programs that promote hazard mitigation will be critical in continue to mitigate wildfire risks from vegetation.
- Hazard Mitigation Action Adoption: County Planning & Development Services (PDS), County FPD, County Technology Office, County Communications Office, and County Office of Emergency Services will publicize and encourage the adoption of appropriate hazard mitigation actions throughout the region.
- MSCP Open Space Acquisitions Efforts: County DPR will continue open space acquisition efforts, such as purchasing land that could be preserved/protect natural resources and undeveloped land in high hazard areas.
- San Diego County Fire Community Emergency Response Team's Community Emergency Preparedness Outreach Program: Utilize County FPD's Community Emergency Response Team (trained and background checked volunteers) to conduct in-person outreach training, events, and activities bringing emergency preparedness information to underserved populations in their rural communities.
- The California Wildfire Mitigation Program - Home-Hardening Initiative: County FPD is currently working with the California Governor's Office of Emergency Services to pilot the California Wildfire Mitigation Program Home-Hardening Initiative. The Home Hardening Initiative aims to perform defensible space and retrofit measures on existing residential homesites to mitigate against wildfire losses. This program targets high social-vulnerability communities and provides financial assistance to qualifying low- and moderate-income households. This pilot program will be implemented in three highrisk areas within San Diego County: Dulzura, Potrero, and Campo.

## San Diego County Wildland–Urban Interface Fire Emergency Response Plan

The San Diego County Fire Chiefs' Association and the San Diego County Police Chiefs' and Sheriff's Association are responsible for approving the San Diego County Wildland–Urban Interface Fire Emergency Response Plan, which is the County's standard emergency response and evacuation management plan format for wildfire. Staff are encouraged to become familiar with the plan and be prepared to integrate with public safety responders in response to emergencies. Park personnel are urged to develop additional emergency response plans consistent with the plan as well as the means and methods necessary for emergency communications with the public. Staff should consider the evacuation and "trigger point" criteria in the plan and determine if additional time will be required to mobilize internal staff and implement the plan. (~~p~~Please see Section 4.20, *Wildfire*, for a detailed assessment of the San Diego County Wildland-Urban Interface Fire Emergency Response Plan~~).~~)

## County of San Diego Code of Regulatory Ordinances Sections 68.401–68.406, Defensible Space for Fire Protection Ordinance

This ordinance addresses issues associated with an accumulation of weeds, rubbish, and other materials on private property that creates a fire hazard and could be injurious to the health, safety, and

general welfare of the public. Under the ordinance, the presence of such weeds, rubbish, and other materials is a public nuisance that requires abatement in accordance with the provisions of this section. The ordinance is enforced in all ~~county service areas~~County Service Areas (CSAs) as well as unincorporated areas ~~of the County~~ that are outside a fire protection district. All fire protection districts have a combustible vegetation abatement program, and many have adopted the County's ordinance.

## County of San Diego Code of Regulatory Ordinances Sections 96.1.005 and 96.1.202, Removal of Fire Hazards

The San Diego County Fire Protection District, in partnership with CAL FIRE, the Bureau of Land Management, and the U.S. Forest Service, is responsible for enforcing defensible space inspections. Inspectors from CAL FIRE are responsible for the initial inspection of properties, ensuring that an adequate defensible space has been created around structures. If violations of program requirements are noted, inspectors provide a list of required corrective measures and a reasonable timeframe for completing the task. If violations still exist upon reinspection, the local fire inspector will forward a complaint to the County for further enforcement action.

## County of San Diego Consolidated Fire Code

The County ~~of San Diego~~, in collaboration with the local fire protection districts, created the first Consolidated Fire Code in 2001; it contains County and fire protection district amendments to the CFC. The purpose of consolidation with respect to the adoptive ordinances of the County and local fire districts is to promote consistency in the interpretation and enforcement of the CFC and protect public health and safety. This involves permit requirements for the installation, alteration, or repair of fire-protection systems and penalties for violations of the code. The Consolidated Fire Code provides minimum requirements for access, water supply and distribution, construction, fire-protection systems, and vegetation management. Additionally, it regulates hazardous material and provides associated measures to ensure that public health and safety are protected from incidents related to hazardous substance releases.

## County Department of Planning and Land Use Fire Prevention in Project Design Standards

Following the October 2003 wildfires, the ~~County DPR's~~County's Department of Planning and Land Use (now ~~Planning and Development Services~~PDS) incorporated several fire prevention strategies into the discretionary project review process for CEQA projects. One of the more significant changes is the requirement ~~that~~for most discretionary permits (e.g., subdivision and use permits) in WUI areas to include a fire protection plan for review and approval. A fire protection plan is a technical report that considers the topography, geology, combustible vegetation (i.e., fuel types), climatic conditions, and fire history at the project location. The plan addresses the following (among others) in terms of compliance with applicable codes and regulations: water supply, primary and secondary access, travel time to the nearest fire station, ~~structure~~distance structures are setback from property lines, ignition-resistant building features, fire-protection systems and equipment, impacts on existing emergency services, defensible space, and vegetation management.

# 4.9.3.4 Local

## Alpine Fire Protection District Ordinance

The Alpine FPD was formed in 1957 to provide fire protection for the community of Alpine. Its Board of Directors created the Alpine FPD Ordinance (No. 2020-01), which adopted the CFC, including Appendices B, C, H, I, and K; the International Fire Code; and National Fire Protection Association Standards 13, 13-R, and 13-D, as referenced in Chapter 80 of the CFC, together with Alpine FPD amendments. The CFC is adopted for the protection of public health and safety. The Alpine FPD Ordinance (No. 2020-01) includes additions, insertions, deletions, and changes to sections and chapters of the CFC.

## Alpine Community Wildfire Protection Plan

The original Alpine Community Wildfire Protection Plan was developed by the Alpine Public Safety Committee, a subcommittee of Supervisor Dianne Jacob's Alpine Revitalization Committee, with guidance and support from the U.S. Forest Service, CAL FIRE, California Department of Transportation, County OES, County ~~Department of Planning and Land Use (now Planning and Development Services~~PDS, County Sheriff's Department, Alpine FPD, Viejas Fire Department, and ~~Greater~~ Alpine Fire Safe Council. The intent of the plan is to optimize the use of scarce resources (i.e., money, people, equipment) to achieve the greatest overall benefit to the community (Alpine Public Safety Committee 2021). The primary goal is to prioritize projects, as follows:

- Defensible space around structures,
- Defensible space along evacuation routes, and
- Hazardous fuels reductions.

A key element of the planning strategy is to link together existing and future fuel-reduction projects so they can provide contiguous corridors of protection along a perimeter surrounding the Alpine area. The areas being linked together involve defensible space projects for community homes and evacuation routes, natural and/or human-made fuel breaks created through agency efforts, and burned areas. Priority is then given to those areas that can achieve the greatest degree of protection with the limited resources available.

## Alpine Community Plan

The *Alpine Community Plan* (County of San Diego 2020) amended on December 14, 2016, outlines guidelines and policies for development within the community plan area. The policies and recommendations that apply to wildfire risk are as follows:

**Safety Policy 3.** Encourage development with fire-preventive development practices and fire resistant plant types.

**Safety Policy 4.** Consider fire hazards in Alpine a serious and significant environmental impact during review of Environmental Impact Reports.

**Conservation Policy 13.** Encourage the continuation of support for the brush management program in conjunction with other public agencies to reduce wildfire hazards.

# 4.9.4 Project Impact Analysis

## 4.9.4.1 Methodology

The project would develop Alpine Park and associated trails and conserve approximately 73 acres of open space~~/preserve~~ land. The following discussion evaluates impacts associated with hazards and hazardous materials should the project be implemented. With respect to existing conditions, the analysis assesses direct and indirect impacts related to hazards and hazardous materials using the thresholds presented below.

## 4.9.4.2 Thresholds of Significance

### Appendix G of the CEQA Guidelines

Based on guidance provided in Appendix G of the CEQA Guidelines, the project would result in a significant impact if it would:

1. Create a significant hazard for the public or the environment through the routine transport, use, or disposal of hazardous materials.
2. Create a significant hazard for the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.
3. Emit hazardous emissions or involve handling hazardous or acutely hazardous materials, substances, or waste within 0.25 mile of an existing or proposed school.
4. Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, create a significant hazard for the public or the environment.
5. For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport, public use airport, or private airstrip, result in a safety hazard or excessive noise for people residing or working in the project area.
6. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.
7. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires.

### County of San Diego Guidelines for Determining Significance

The following *County of San Diego Guidelines for Determining Significance, Hazardous Materials and Existing Contamination* (County of San Diego 2007), guide the evaluation of whether a significant impact related to hazardous substances and existing contamination would be likely to occur as a result of project implementation. A project will generally be considered to have a significant effect if it proposes any of the items listed below, absent specific evidence to the contrary. Conversely, if a project does not propose any of the items, it will generally not be considered to have a significant effect related to hazardous substances and existing contamination, absent specific evidence of such an effect.

1. The project is a business, operation, or facility that would handle hazardous substances in excess of the threshold quantities listed in Chapter 6.95 of the H&SC, generate hazardous waste regulated under Chapter 6.5 of the H&SC, and/or store hazardous substances in USTs regulated under Chapter 6.7 of the H&SC and therefore would not be able to comply with applicable hazardous substance regulations.
2. The project is a business, operation, or facility that would handle regulated substances that are subject to CalARP Risk Management Plan requirements and, in the event of a release, could adversely affect children's health due to the presence of a school or day-care facility within 0.25 mile of the project.
3. The project is on or within 0.25 mile of a site identified in one of the regulatory databases compiled pursuant to Government Code Section 65962.519 or otherwise known to have been the subject of an investigation regarding a release of hazardous substances and, as a result, may result in a significant hazard for the public or the environment.
4. The project proposes structures for human occupancy and/or significant linear excavation within 1,000 feet of an open, abandoned, or closed landfill (excluding burn sites) and, as a result, would create a significant hazard for the public or the environment.
5. The project is proposed on or within 250 feet of the boundary of a parcel identified as containing burn ash (from the historic burning of trash) and, as a result, would create a significant hazard for the public or the environment.
6. The project is proposed on or within 1,000 feet of a formerly used defense site and it has been determined that it is probable that munitions or other hazards are located on the site that could represent a significant hazard for the public or the environment.
7. The project could result in human or environmental exposure to soil or groundwater that exceeds U.S. EPA Region 9 Preliminary Remediation Goals, CalEPA California Human Health Screening Levels, or Primary State or Federal Maximum Contaminant Levels for applicable contaminants; therefore, exposure would represent a hazard for the public or the environment.
8. The project would involve the demolition of commercial, industrial, or residential structures that may contain asbestos-containing materials, lead-based paint, and/or other hazardous materials and, as a result, represent a significant hazard for the public or the environment.

## 4.9.4.3 Project Impacts and Mitigation Measures

***Threshold 1: Implementation of the project <u>would not</u> create a significant hazard for the public or the environment through the routine transport, use, or disposal of hazardous materials.***

### County Park and Trails

#### Impact Discussion

##### Construction

Project construction would involve the routine transport, use, and disposal of hazardous materials, such as solvents, paints, oils, grease, and caulking. Such transport, use, and disposal must comply

with applicable regulations, such as those discussed under Section 4.9.3, *Applicable Laws and Regulations*. Although small amounts of hazardous materials would be transported, used, and disposed of during the construction phase, these materials are typically used in construction projects and would not represent the transport, use, and disposal of acutely hazardous materials. In addition, best management practices (BMPs) would be employed during construction to prevent spills of hazardous materials into the surrounding environment, as required by the project-specific Stormwater Pollution Prevention Plan (SWPPP) to be prepared under the Construction General Permit (Order No. 2009-009-DWQ, NPDES No. CAS000002, as amended by Order 2010-014-DWQ and 2012-06-DWQ). Therefore, potential construction impacts associated with the routine transport, use, or disposal of hazardous materials would be less than significant.

### Operation

The project would develop Alpine Park and associated trails and conserve approximately 73 acres of open space~~/preserve~~ land. Facilities within Alpine Park would include multi-use turf areas, a baseball field, an all-wheel parea~~k~~, bike skills area, recreational courts (i.e., for basketball, pickleball), fitness stations, leash-free dog area, restroom facilities, an administrative facility/ranger station, equestrian staging area with a corral, a nature play area, a community garden, a volunteer pad, picnic areas with shade structures and picnic tables, a game table plaza, and trails. Operations associated with the project (i.e., restrooms, ranger station, administrative facility) would use hazardous chemicals that are currently used for park operations and typical in these types of settings. These could include common materials such as toners, paints, restroom cleaners, and other maintenance materials. Grounds and landscape maintenance within the project area would use a variety of commercial products that are considered to be hazardous materials, including fuels, cleaners and degreasers, solvents, paints, lubricants, adhesives, sealers, and pesticides/herbicides. These products would not be stored or used in quantities that would result in a significant release. Any spills involving these materials would be small, localized, and cleaned up as they occur. Furthermore, the transport, use, and disposal of hazardous materials would comply with all applicable federal, ~~s~~State, and local regulations. Therefore, potential operational impacts associated with the routine transport, use, or disposal of hazardous materials would be less than significant.

## Impact Determination

The project would not result in a significant hazard for the public or the environment through the routine transport, use, or disposal of hazardous materials. Impacts would be less than significant.

## Mitigation Measures

No mitigation is required.

## Level of Significance After Mitigation

Impacts would be less than significant.

## Open Space~~/Preserve~~

### Impact Discussion

#### Construction

Project construction would involve the routine transport, use, and disposal of hazardous materials, such as solvents, paints, oils, grease, and caulking. Such transport, use, and disposal must comply with applicable regulations, such as those discussed in Section 4.9.3, *Applicable Laws and Regulations*. Although small amounts of hazardous materials would be transported, used, and disposed of during the construction phase, these materials are typically used in construction projects and would not represent the transport, use, or disposal of acutely hazardous materials. In addition, BMPs would be employed during construction to prevent spills of hazardous materials into the surrounding environment, as required by the project-specific SWPPP to be prepared under the Construction General Permit (Order No. 2009-009-DWQ, NPDES No. CAS000002, as amended by Order 2010-014-DWQ and 2012-06-DWQ). Therefore, potential construction impacts associated with the routine transport, use, or disposal of hazardous materials would be less than significant.

#### Operation

Operation of the project's open space~~/preserve~~ portion is not anticipated to require the use of hazardous materials. Therefore, potential operational impacts associated with the routine transport, use, or disposal of hazardous materials would be less than significant.

### Impact Determination

The project would not result in a significant hazard for the public or the environment through the routine transport, use, or disposal of hazardous materials. Impacts would be less than significant.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

Impacts would be less than significant.

***Threshold 2: Implementation of the project <u>would</u> create a significant hazard for the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.***

## County Park and Trails

### Impact Discussion

#### Construction

As discussed in Section 4.9.2. *Existing Conditions*, a review of the GeoTracker and EnviroStor online databases identified one EnviroStor listing within the project site, High School No. 12, Study Area B,

Wright's Field, at 2480 South Grade Road in Alpine. There are no other listed hazardous material sites within the project footprint or within a 0.25-mile radius of the project site. A March 20, 2008, letter from DTSC to the Grossmont Union High School District concluded that there were no hazardous material releases or presence of naturally occurring hazardous materials at the project site. However, there was no information in the letter regarding soil testing, and, due to the former agricultural uses present on the project site, there could potentially be residual soil contamination from the historic use of herbicides or pesticides. Ground-disturbing construction activities could potentially result in the release of contaminated soil into the environment (**Impact HAZ-1**). Therefore, construction impacts would be potentially significant.

### Operation

Once operational, the project would not be expected to create a significant hazard for the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. As discussed under Threshold 1, the project would use hazardous materials such as toners, paints, restroom cleaners, fuels, cleaners and degreasers, solvents, paints, lubricants, adhesives, sealers, and pesticides/herbicides during operation. Since proper procedures would be adhered to, it is unlikely that such materials would be stored or used in quantities that would result in a release of any significance. Any spills involving these materials would be small, localized, and cleaned up as they occur. Furthermore, the transport, use, and disposal of hazardous materials would comply with all applicable federal, ~~s~~State, and local regulations, which would reduce the risk of hazardous material releases. Therefore, operational impacts would be less than significant.

## Impact Determination

**Impact HAZ-1: Potential Release of Contaminated Soil.** Construction of the project would potentially result in the release of contaminated soil into the environment. Impacts would be potentially significant.

## Mitigation Measures

**MM-HAZ-1: Prepare and Implement a Soil Management Plan.** Prior to the commencement of soil-disturbing construction activities, the County will retain a licensed professional geologist, professional engineering geologist, or professional engineer with experience in contaminated site redevelopment and restoration to prepare and submit a soil and groundwater management plan to the County for review and approval. After the County's review and approval, the County will implement the soil and groundwater management plan, which will include the following:

- A *Site Contamination Characterization Report* (Characterization Report) delineating the vertical and lateral extent and concentration of residual contamination from the site's past uses in areas where soil would be disturbed. The Characterization Report will include a compilation of data, based on a historical records review and prior reports and investigations, and, where data gaps are found, new soil and groundwater sampling to characterize the existing vertical and lateral extent and concentration of residual contamination.
- A *Soil Testing and Profiling Plan* (Testing and Profiling Plan) for materials that will be disposed of during construction. All potential contaminants of concern will be tested, including CCR Title 22 metals, polycyclic aromatic hydrocarbons, volatile organic

compounds, herbicides, pesticides, polychlorinated biphenyls, or any other potential contaminants, as specified within the Testing and Profiling Plan. The Testing and Profiling Plan will document compliance with CCR Title 22 for proper identification and segregation of hazardous and solid waste as needed for acceptance at a CCR Title 22-compliant off-site disposal facility. All excavation activities will be actively monitored by a registered environmental assessor for the potential presence of contaminated soils and compliance with the Testing and Profiling Plan.

- A *Soil Disposal Plan* (Disposal Plan), which will describe the process for excavation, stockpiling, dewatering, treating, loading, and hauling of soil from the site. This plan will be prepared in accordance with the Testing and Profiling Plan (i.e., in accordance with CCR Title 22, CCR Title 27, DOT Title 40 CFR Part 263), and current industry best practices for the prevention of cross-contamination, spills, or releases. Measures will include, but not be limited to, segregation into separate piles for waste profile analysis based on organic vapor and visual and odor monitoring.
- A *Site Worker Health and Safety Plan* (Safety Plan) to ensure compliance with 29 CFR Part 120, Hazardous Waste Operations and Emergency Response, regulations for site workers at uncontrolled hazardous waste sites. The Safety Plan will be based on the characterization report and planned site construction activity to ensure that site workers who are potentially exposed to contamination in soil are trained, equipped, and monitored during site activities. Training, equipment, and monitoring will ensure that workers will not be exposed to contaminants above personnel exposure limits established by Table Z, 29 CFR Part 1910.1000. The Safety Plan will be signed by and implemented under the oversight of a ~~s~~State certified industrial hygienist.

### Level of Significance After Mitigation

**Impact HAZ-1** would be reduced to less than significant after implementation of **MM-HAZ-1,** which would ensure preparation and implementation of a Soil Management Plan.

## Open Space~~/Preserve~~

### Impact Discussion

#### Construction and Operation

Because ground-disturbing construction activities are not proposed as part of the project's open space~~/preserve~~ portion, this project component would not create a significant hazard for the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

### Impact Determination

The open space~~/preserve~~ component would not result in a significant hazard for the public or the environment. Impacts would be less than significant.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

Impacts would be less than significant.

***Threshold 3: Implementation of the project would emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.***

## County Park and Trails

### Impact Discussion

#### Construction

Nearby schools include Joan MacQueen Middle School, approximately 0.4-mile west of the project site at 2001 Tavern Rd in Alpine, and Boulder Oaks Elementary School, approximately 0.7-mile west of the project site at 2320 Tavern Rd. As mentioned under Threshold 1, project construction would involve the routine handling of hazardous materials such as solvents, paints, oils, grease, and caulking. These materials must be handled in compliance with applicable regulations, such as those discussed in Section 3.8.2, *Regulatory Setting*. Small amounts of these materials would be handled during construction; however, these are typical for construction projects and would not include acutely hazardous materials. In addition, BMPs would be employed during construction (e.g., parking and refueling vehicles and equipment in one area, practicing good housekeeping, properly disposing of hazardous waste) to prevent spills of hazardous materials into the surrounding environment.

As discussed previously, the project site does not have a history of onsite contamination; however, a Soil Management Plan would be prepared to evaluate potential for contaminated soils on the project site associated with former agricultural uses (**MM-HAZ-1**). Because the Soil Management Plan **(MM-HAZ-1)** would ensure proper handling of potentially contaminated soils during construction, and routine handling of hazardous materials would be in compliance with applicable regulations, impacts from emissions or handling of hazardous materials near schools would be reduced to less than significant.

#### Operation

Operations associated with the project (i.e., restrooms, ranger station, administrative facility) would use hazardous chemicals that are currently used for park operations and typical in these types of settings. These could include common materials such as toners, paints, restroom cleaners, and other maintenance materials. Grounds and landscape maintenance within the project area would use a variety of commercial products that are considered hazardous materials, including fuels, cleaners and degreasers, solvents, paints, lubricants, adhesives, sealers, and pesticides/herbicides. These products would not be stored or used in quantities that would result in a significant release. Any spills involving these materials would be small, localized, and cleaned up as they occur. Therefore, potential operational impacts associated with emissions or the handling of hazardous materials near schools would be less than significant.

### Impact Determination

**Impact HAZ-1: Potential Release of Contaminated Soil.** Ground-disturbing construction activities could potentially result in impacts from emissions or the handling of hazardous materials near schools. Impacts would be potentially significant.

### Mitigation Measures

Implement **MM-HAZ-1**, as described above.

### Level of Significance After Mitigation

**Impact-HAZ-1** would be reduced to less than significant after implementation of **MM-HAZ-1**, which would ensure the proper handling of potentially contaminated soils during construction as well as the proper handling of hazardous materials near schools.

## Open Space~~/Preserve~~

### Impact Discussion

#### Construction and Operation

Because ground-disturbing construction activities are not proposed as part of the project's open space~~/preserve~~ portion, this project component would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.

### Impact Determination

Impacts would be less than significant.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

Impacts would be less than significant.

***Threshold 4: The project would be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would ~~not~~ create a significant hazard for the public or the environment.***

## County Park and Trails

### Impact Discussion

#### Construction and Operation

As discussed under Threshold 2, a review of the GeoTracker and EnviroStor online databases only identified one EnviroStor listing within the project site, High School No 12, Study Area B, Wrights Field, at 2480 South Grade Road in Alpine. There are no other listed hazardous materials sites within the project footprint or a 0.25-mile radius of the project site. This site's potential impact to the project is analyzed under Threshold 2. With implementation of **MM-HAZ-1**, the project site is not anticipated to create a significant hazard for the public or the environment.

### Impact Determination

**Impact HAZ-1: Potential Release of Contaminated Soil.** Impacts would be potentially significant.

### Mitigation Measures

Implement **MM-HAZ-1**, as described above.

### Level of Significance After Mitigation

Impacts would be less than significant.

## Open Space~~/Preserve~~

### Impact Discussion

#### Construction and Operation

Because ground-disturbing construction activities are not proposed as part of the open space~~/ preserve~~ portion of the project, this project component is not anticipated to create a significant hazard for the public or the environment.

### Impact Determination

Impacts would be less than significant.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

Impacts would be less than significant.

***Threshold 5: For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport, public use airport, or private airstrip, the project would not result in a safety hazard or excessive noise for people residing or working in the project area.***

## County Park and Trails and Open Space~~/Preserve~~

### Impact Discussion

#### Construction and Operation

The project is not within an airport land use plan or within 2 miles of a public airport or public use airport (San Diego County Regional Airport Authority 2021). The nearest airport to the project site is On the Rocks Airport (1CA6), approximately 4.5 miles southeast of the project site (AirNav.com 2021). Therefore, the project is not anticipated to result in a safety hazard or excessive noise due to proximity to an airport, and no impact would occur.

### Impact Determination

Impacts would be less than significant.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

Impacts would be less than significant.

***Threshold 6: The project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.***

## County Park and Trails and Open Space~~/Preserve~~

### Impact Discussion

#### Construction and Operation

South Grade Road serves as a regional route for evacuation traffic and carries significant traffic daily (Rohde and Associates 2020). As discussed in Section 4.17, *Transportation and Circulation*, a transportation impact study (TIS) was prepared by CR Associates in April 2020 to identify vehicular impacts associated with the operation of the project (CR Associates 2020). The TIS was performed in accordance with the County of San Diego Traffic Impact Guidelines. No significant impacts related to traffic were identified in the TIS. Therefore, the project would not interfere with the operational area emergency plan or the multijurisdictional hazard mitigation plan. Furthermore, the project would not prohibit subsequent plans from being established or prevent the goals and objectives of existing plans from being carried out. Therefore, the project would not impair implementation of or

physically interfere with an adopted emergency response plan or emergency evacuation plan, and impacts would be less than significant.

### Impact Determination

Impacts would be less than significant.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

Impacts would be less than significant.

***Threshold 7: The project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires.***

## County Park and Trails and Open Space~~/Preserve~~

### Impact Discussion

For additional analysis of wildfire hazards, please see Section 4.20, *Wildfire*. According to CAL FIRE's Fire Hazard Severity Zones in SRA Map, the project site is in a VHFHSZ (CAL FIRE 2007). Rohde and Associates prepared an FEOA on June 25, 2021, to identify wildfire risks at the project site (Appendix J) (Rohde and Associates 2021). The FEOA identified the following site-specific wildfire and ignition risks at the project site:

- Proximity to South Grade Road, a known location with human-related fire ignition factors;
- Adjacency of the site to significant human activity, including homes and ranches;
- Robust public usage of the site for both dispersed and organized recreation;
- Location of the park site with respect to historical major wildfire corridors;
- Heavy fuel concentrations on some County/BCLT lands;
- Current off-road parking and occasional vehicle trespass; and
- Potential increase in demands on local public safety resources as a result of developed park use.

#### Construction

As noted, the project site is partially within a VHFHSZ. Heat or sparks from construction equipment and vehicles, as well as the use of flammable materials, have the potential to ignite adjacent vegetation and start a fire, especially during weather events with low humidity and high wind speeds that are typically experienced in the summer and fall, but can occur year-round in the San Diego region. County DPR and its contractors would implement standard BMPs for the mitigation of potential ignition sources. Such BMPs include the following:

- All vehicles would be required to carry a fire extinguisher in case of accidental fire ignition,
- Vehicles would not be permitted to park or idle over dry brush, and

- Proper wildfire awareness, reporting, and suppression training will be provided to construction personnel.

Implementation of standard BMPs would reduce the potential for ignition and increase the ability of on-site workers and staff to control and extinguish a wildfire event. Therefore, construction of the project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires.

### Operation

Operation of the project could introduce new conditions that could exacerbate wildfire risk at the project site. While development of the project would reduce the fuel load on the project site by developing natural habitat with a built environment, operation of the project would introduce visitors to the project site who were not previously present. Given the high percentage of wildfires in Southern California that are ignited by human-related causes, this could exacerbate existing wildfire risks on the site (please see Section 4.20, *Wildfire*, for a detailed assessment of the wildfire risk and its management). The measures discussed below would also be in effect.

The project would comply with ~~County Code of Regulatory Ordinances~~ Title ~~3~~9, Division ~~5, Chapter 3, as well as Appendix IIA~~1, of the ~~Uniform Fire Code~~CFC. Furthermore, County DPR would be required to comply with the Defensible Space for Fire Protection Ordinance (County of San Diego 2011). That ordinance would require~~s~~ combustible vegetation; dead, dying, or diseased trees; green waste; rubbish; or other flammable materials to be cleared within 30 feet of the property line and within 10 feet of each side of a highway, private road, or driveway in order to maintain defensible space (County of San Diego 2011). The project would also be required to comply with the County of San Diego Fire Service Conditions stipulated by County Fire Services personnel (i.e., County Fire Marshall) upon review and approval of the project.

Access to the park has been designed in coordination with County DPR, ~~the~~ County ~~Department of Public Works~~DPW, and County Fire Services personnel to ensure accommodation for large pieces of fire apparatus and horse trailers as they enter and exit. In addition, as part of project operations, signs with park rules and regulations would be clearly posted, in compliance with County Code of Regulatory Ordinances Title 4, Public Property, Division 1, Parks and Recreation, Chapter 1, County Parks and Recreation. The rules, which would be enforced by park employees, would include, but not be limited to, the following:

- Smoking would be prohibited.
- Campfires and open flames would be prohibited, and barbeques would be locked on red-flag days. County DPR has procedures for the enforcement of "open flame bans," which are initiated by declaration of a red-flag warning. County DPR would integrate signage and other interpretive stations at key site entrance points, indicating red-flag conditions when announced by fire agencies. When a warning is issued, region managers would reach out to the field staff and begin the process of shutting down all barbeques by signing and banning/taping them off until the warning is lifted. Additional signage would be posted at park entrances and throughout the park. Park personnel would patrol the park to enforce the ban.
- No person would be allowed to use, transport, carry, fire, or discharge any fireworks, firearm, weapon, air gun, archery device, slingshot, or explosive of any kind across, in, or into a County park.
- Parking would occur in designated staging areas.

County DPR would prepare a Site Evacuation Plan as part of operational planning for the project. The Site Evacuation Plan would include emergency contact information, evacuation routes and established meeting places, and safety protocols to ensure the safe evacuation of visitors and employees of the park. County DPR would also implement recommendations provided in the FEOA prepared by Rohde and Associates for the project as outlined below.

Because the project would introduce potential ignition sources to a previously undeveloped open space area, fire prevention protocols would be implemented as part of the project. The following fire prevention protocols, which were recommended in the Rohde and Associates assessment, would be implemented as project design features:

- Facility Fire-Safe Design. County DPR shall design appropriate facility elements and ensure County fire and building code compliance to reduce wildfire risks for users and the area. Fire-resistive landscaping would create a fire-safe area where the two dog parks, ~~three soccer~~open fields, and baseball diamond are proposed. In addition, the paved parking lot, basketball and pickleball courts, equestrian area, and other cleared areas would not only provide a buffer that would protect the park from wildfire but also provide a temporary safe refuge area with safe ingress and egress (Rohde and Associates 2021).
- Fire-Resistive Landscaping. All landscape vegetation on park premises would be consistent with the guidelines of the County ~~Department of Planning and Development Services~~PDS as well as the County's approved fire-resistive landscape plant palette. Generally, these plants would:
    - Grow close to the ground;
    - Have a low sap or resin content;
    - Grow without accumulating dead branches, needles, or leaves;
    - Be easily maintained and pruned;
    - Be drought tolerant;
    - Be responsive to adequate irrigation to maintain a "green" state; and
    - Not present intense thermal outputs during combustion.
- Safe Refuge Sites. Parking and equestrian areas would serve as emergency safe routes, providing broad expanses of non-combustible surfaces. These areas would be free of combustible ground cover and cleared of native vegetation whenever possible. Because equestrians would most likely use County facilities as temporary safe refuge sites during wildfires, the equestrian facility would need to be designed to be both substantial and fire resistive so as to provide secure and safe housing for large animals and prevent accidental releases due to animal panicking during wildfires.
- Fuel Modification Program. County DPR shall implement a long-term fuel modification program. This management would be accomplished on a scale needed to alleviate identified fire behavior potential while limiting environmental impacts from the treatment and offering the highest protection value for the expense and effort. The goals of this fuel modification program would be to reduce wildfire intensity enough to offer reasonable protection to adjacent structural assets, limit landowner liability from wildfire damage to adjoining properties, provide protection for DPR/BCLT site development, and ensure safe public refuge at key sites. Existing fuel modification maintenance includes a 30-foot buffer of vegetation clearance along the frontage of South Grade Road on the County property and a 100-foot buffer of vegetation clearance and

defensible space at adjoining properties along the northern boundary of the County-owned parcel, as directed by the Alpine FPD Defensible Space Requirements (Alpine FPD 2022). This document is attached as Appendix L. The County will specifically implement a 100-foot buffer of vegetation clearance that extends from the volunteer pad, an additional 20-foot buffer of vegetation clearance adjoining the 30-foot buffer of vegetation clearance (total of 50-foot buffer clearance) adjacent to the roadside within the proposed park footprint, as well as a 20-foot buffer adjoining the 30-foot buffer approximately 100 feet south of the northeast corner of the County's parcel in order to reduce hazards associated with increased human-related fire ignition factors. The aggregate 50-foot vegetation clearance and 30-foot vegetation clearance also reduce an extension of wildfire from the historical wildfire corridor on the east face of the site.

- Fuel Reduction Zones. The project also shall achieve Zone A–compliant fuel modification around the Alpine Park facility per fire and building code requirements, with the goal of 100 percent fire exclusion from the project site. The objective of landscape replacement in Zone A will be to eliminate the potential for wildfire occurrence through establishment of a fire-resistive landscape around principal park facilities and structures at the minimum distances required by code. This has been designed through the proposed landscape around sports fields and buildings, subject to Alpine Fire Marshal review and approval during the permitting process (Rohde and Associates 2021). Zone B fuel reduction shall occur adjacent to Zone A along property lines, where practical, and around key public facilities such as the parking areas, equestrian staging areas, and similar locations. Fuel modification in Zone B should be designed to achieve fire prevention goals while maintaining viable habitat and preserving ecological values. The objective of fuel treatment in Zone B is to achieve at least a 75 percent reduction in fire-line intensity from a wildfire moving from native fuels into a constructed fuel modification zone (Rhode and Associates 2021). The County will implement a 100-foot fuel reduction area extending from the volunteer pad under Zone A and Zone B compliance.
- Fuel Modification Criteria: A–O in FEOA (Appendix J)
    - Treatment Methods. County DPR shall implement one or more of the recommended treatment method alternatives, including:
        - Mechanical treatment, including mowing or plowing, may be used to establish fuel modification in grass where terrain is within the mechanical limits of equipment to extend parking lot or equestrian staging area clearance for safe refuge.
        - Grazing for grass and lighter fueled sites such as sage scrub in the south half or northwest quarter.
        - Hand treatment by hand crews is recommended for steep sites and sites with heavy fuels such as shrub fuel and steep-sloped areas in the northwest quarter of the combined site.
        - Spot control with herbicides. Herbicides would be used to control undesired weeds or selective vegetation within fuel modification areas.
- Partner Collaboration for Fire Prevention. County DPR shall coordinate with neighboring entities, including BCLT, ~~Greater~~ Alpine Fire Safe Counsel, the Alpine FPD, San Diego County FPD, CAL FIRE, County ~~Road Department~~DPW, and San Diego Gas & Electric, on regional defensible-space initiatives, fuel modification, and structural defense initiatives, including sharing of resources, planning, and costs.

- Comply with the Regional Wildfire and Evacuation Plan (see Section 4.20, *Wildfire*). The San Diego County WUI Fire Emergency Response Plan has been updated for the Alpine southeast area as a part of the Rohde and Associates FEOA (Appendix J). This document, which is also approved by the San Diego County Fire Chiefs Association and San Diego County Police Chiefs' and Sheriff's Association ~~and~~, is the County standard emergency response and evacuation management plan ~~format~~ for wildfire. County DPR shall implement the project in compliance with the plan.
- Comply with Site-Specific Wildfire and Evacuation Plan. An Alpine Community Park Fire Evacuation Analysis was developed by Chen Ryan Associates (Appendix K) to assess the time required for emergency evacuation from the project site under several scenarios, assuming a wind-driven fire that results in a required evacuation affecting the project site and surrounding community. The traffic evacuation simulations presented within the analysis found that evacuation traffic generated by the project would not significantly increase the average evacuation travel time or result in unsafe evacuation timeframes. Evacuation flow would be able to be effectively managed.

Implementation of the aforementioned project design features, compliance with applicable ordinances and regulations, and enforcement of County DPR rules and regulations would reduce the potential for the project to expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires. Impacts would be less than significant.

### Impact Determination

Implementation of the project would not expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires. Impacts would be less than significant.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

Impacts would be less than significant.

***Threshold 8: The project <u>would not</u> be a business, operation, or facility that would handle hazardous substances in excess of the threshold quantities listed in Chapter 6.95 of the H&SC, generate hazardous waste regulated under Chapter 6.5 of the H&SC, and/or store hazardous substances in Underground storage tanks regulated under Chapter 6.7 of the H&SC<u>,</u> and the project would comply with applicable hazardous substance regulations.***

## County Park and Trails and Open Space~~/Preserve~~

### Impact Discussion

As discussed above under Threshold 1, project construction would involve the routine transport, use, and disposal of hazardous materials, such as solvents, paints, oils, grease, and caulking.

Potential construction impacts associated with the routine transport, use, or disposal of hazardous materials would be less than significant. Operations associated with the project (i.e., restrooms, ranger station, administrative facility) would use hazardous chemicals that are currently used for park operations and typical in these types of settings. These products would not be stored or used in quantities that would result in a significant release. Potential operational impacts associated with the routine transport, use, or disposal of hazardous materials would be less than significant. The project would not propose a business, operation, or facility that would handle hazardous substances in excess of the threshold quantities listed in Chapter 6.95 of the H&SC, generate hazardous waste regulated under Chapter 6.5 of the H&SC, and/or store hazardous substances in USTs regulated under Chapter 6.7 of the H&SC. The project would comply with applicable hazardous substance regulations.

### Impact Determination

Impacts would be less than significant.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

Impacts would be less than significant.

***Threshold 9: The project <u>would</u> be a business, operation, or facility that would handle regulated substances subject to CalARP Risk Management Plan requirements that in the event of a release could adversely affect children's health due to the presence of a school or day care within one-quarter mile of the facility.***

## County Park and Trails and Open Space~~/Preserve~~

### Impact Discussion

As discussed under Threshold 3, nearby schools include Joan MacQueen Middle School, approximately 0.4 mile west of the project site at 2001 Tavern Road, Alpine, and Boulder Oaks Elementary School, approximately 0.7 mile west of the project site at 2320 Tavern Road. Project construction would involve the routine transport, use, and disposal of hazardous materials, such as solvents, paints, oils, grease, and caulking. Operations associated with the project (i.e., restrooms, ranger station, administrative facility) would use hazardous chemicals that are currently used for park operations and typical in these types of settings. These materials would be stored or used in quantities that would not result in a significant release. Any spills involving these materials would be small, localized, and cleaned up as they occur. As discussed under Threshold 2, ground-disturbing construction activities could potentially result in a release of contaminated soil into the environment (**Impact HAZ-1**). Therefore, construction impacts would be potentially significant.

### Impact Determination

**Impact HAZ-1: Potential Release of Contaminated Soil.** Ground-disturbing construction activities could potentially result in impacts from emissions or handling of hazardous materials near schools. Impacts would be potentially significant.

### Mitigation Measures

Implement **MM-HAZ-1**, as described above.

### Level of Significance After Mitigation

**Impact-HAZ-1** would be reduced to less than significant after implementation of **MM-HAZ-1**, which would ensure the proper handling of potentially contaminated soils during construction as well as the proper handling of hazardous materials near schools.

***Threshold 10: The project would be located on or within one-quarter mile of a site identified in one of the regulatory databases compiled pursuant to Government Code Section 65962.519 or 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 for the public or the environment.***

## County Park and Trails and Open Space~~/Preserve~~

### Impact Discussion

As discussed under Thresholds 2 and 4, a review of the GeoTracker and EnviroStor online databases only identified one EnviroStor listing within the project site, High School No 12, Study Area B, Wrights Field, at 2480 South Grade Road, Alpine. There are no other listed hazardous materials sites within the project footprint or a 0.25-mile radius from the project site. This site's potential impact ~~pm~~on the project is analyzed under Threshold 2. With implementation of **MM-HAZ-1**, the project site is not anticipated to create a significant hazard for the public or the environment.

### Impact Determination

**Impact HAZ-1: Potential Release of Contaminated Soil.** Impacts would be potentially significant.

### Mitigation Measures

Implement **MM-HAZ-1**, as described above.

### Level of Significance After Mitigation

Impacts would be less than significant.

***Threshold 11: The project does not propose structures for human occupancy and/or significant linear excavation within 1,000 feet of an open, abandoned, or closed landfill (excluding burn sites) and, as a result, the project would not create a significant hazard for the public or the environment.***

## County Park and Trails and Open Space~~/Preserve~~

### Impact Discussion

The project does not propose structures for human occupancy and/or significant linear excavation within 1,000 feet of an open, abandoned, or closed landfill (excluding burn sites). Therefore, it would not create a significant hazard for the public or the environment.

### Impact Determination

There would be no impact.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

There would be no impact.

***Threshold 12: The project is not proposed on or within 250 feet of the boundary of a parcel identified as containing burn ash (from the historic burning of trash) and, as a result, the project would not create a significant hazard for the public or the environment.***

## County Park and Trails and Open Space~~/Preserve~~

### Impact Discussion

The project site is not on or within 250 feet of a parcel identified as containing burn ash (from the historic burning of trash). Therefore, it would not create a significant hazard for the public or the environment.

### Impact Determination

There would be no impact.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

There would be no impact.

***Threshold 13: The project would not be proposed on or within 1,000 feet of a formerly used defense site and munitions or other hazards are not located on site that could represent a significant hazard for the public or the environment.***

## County Park and Trails and Open Space~~/Preserve~~

### Impact Discussion

The project site is not on or within 1,000 feet of a formerly used defense site. Therefore, it would not represent a significant hazard for the public or the environment.

### Impact Determination

There would be no impact.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

There would be no impact.

***Threshold 14: The project could result in human or environmental exposure to soil or groundwater that exceeds U.S. EPA Region 9 Preliminary Remediation Goals, CalEPA 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.***

## County Park and Trails and Open Space~~/Preserve~~

### Impact Discussion

As discussed under Threshold 2, ground-disturbing construction activities could potentially result in the release of contaminated soil into the environment (**Impact HAZ-1**), thereby resulting in human or environmental exposure to contaminated soil. Soil at the project site could potentially exceed U.S. EPA Region 9 Preliminary Remediation Goals, CalEPA California Human Health Screening Levels, or Primary State or Federal Maximum Contaminant Levels for applicable contaminants. Therefore, construction impacts would be potentially significant.

### Impact Determination

**Impact HAZ-1: Potential Release of Contaminated Soil.** Impacts would be potentially significant.

### Mitigation Measures

Implement **MM-HAZ-1**, as described above.

### Level of Significance After Mitigation

**Impact HAZ-1** would be reduced to a less-than-significant level after implementation of **MM-HAZ-1**, which would ensure preparation and implementation of a Soil Management Plan.

***Threshold 15: The project would not involve the demolition of commercial, industrial, or residential structures that may contain asbestos-containing materials, lead-based paint, and/or other hazardous materials and, as a result, the project would not represent a significant hazard for the public or the environment.***

## County Park and Trails and Open Space~~/Preserve~~

### Impact Discussion

The project would not involve the demolition of commercial, industrial, or residential structures.

### Impact Determination

There would be no impact.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

There would be no impact.

# 4.9.5 Summary of Significant Impacts

**Table 4.9-1. Summary of Significant Hazards and Hazardous Materials Impacts and Mitigation Measures**

| Summary of Potentially Significant Impact(s) | Summary of Mitigation Measure(s) | Level of Significance After Mitigation | Rationale for Finding After Mitigation |
|---|---|---|---|
| **Impact HAZ-1: Potential Release of Contaminated Soil** | **MM-HAZ-1: Prepare and Implement a Soil Management Plan** | Less than Significant | **MM-HAZ-1** would ensure proper identification, handling, and disposal of contaminated soils if encountered on the project site. |

Section 4.10
# Hydrology and Water Quality

## 4.10.1 Overview

This section describes the existing conditions and applicable laws and regulations for hydrology and water quality, and analyzes the potential ~~effects related~~changes to these resources that may result from implementation of the project.

## 4.10.2 Existing Conditions

This section describes the environmental settings of the project site related to hydrology and water quality.

### 4.10.2.1 Existing Surface Water Quality Conditions

#### Surface Water Hydrology

~~-~~The San Diego region is divided into 11 hydrologic units (HUs) that flow from elevated regions in the east to lagoons, estuaries, or bays in the west and feature similar water quality characteristics and issues. A watershed is ~~a large~~an area of land that drains to a common waterway, such as a stream, lake, estuary, wetland, aquifer, or ocean. The project is~~ located~~ within the Lower Sweetwater River (hydrologic unit code [HUC] 1807030409), Upper San Diego River (HUC 1807030405), and the Upper Sweetwater River (HUC 1807030408) ~~(~~sub~~-)~~ watersheds, all~~ of which are~~ within the larger San Diego Watershed. Watershed Management Areas (WMAs) are grouped according to HUs, which consist of smaller hydraulic areas/sub-watersheds and have been developed to implement federal and ~~s~~State statutes for the management of water quality in the region. The western portion of the project site is within the San Diego River WMA and the eastern portion is within the San Diego Bay WMA, as shown on Figure 4.10-1~~.~~.

The San Diego River WMA, which covers 277,543 acres, contains the San Diego River, Boulder Creek, El Capitan Reservoir, San Vicente Reservoir, Santee Lakes, ~~Boulder Creek,~~ and Lake Murray. Much of the impounded water in the reservoirs is used to serve population centers within the ~~c~~County. The watershed is drained by the San Diego River, which discharges into the Pacific Ocean between Mission Beach and Ocean Beach in the City of San Diego. The western portion of the project site is within the El Capitan hydraulic area (HA). Approximately 74% of the San Diego River WMA is in the unincorporated ~~county~~area (Project Clean Water 2021a).

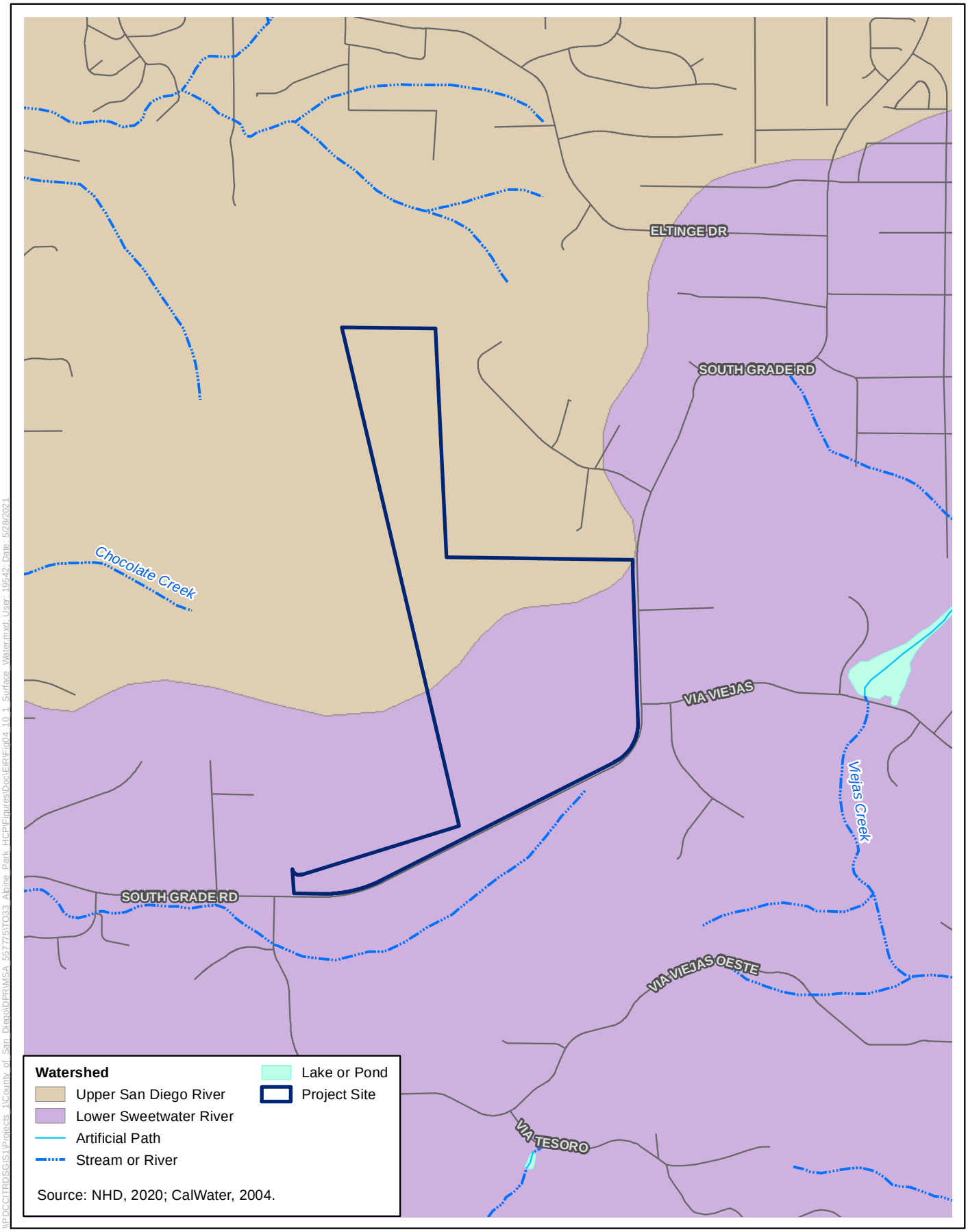



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**Figure 4.10-1**
**Surface Water**
**Alpine Park Project**

The eastern portion of the project site is within the San Diego Bay WMA, which covers 282,580 acres and consists of three major watersheds: Pueblo San Diego, Sweetwater, and Otay. The eastern portion of the project site falls within the Sweetwater Watershed of the San Diego Bay WMA, which encompasses over 148,000 acres. The Sweetwater Watershed includes three hydraulic areas: Lower Sweetwater, Middle Sweetwater, and Upper Sweetwater. The eastern portion of the project site is within the Upper Sweetwater HA. Major water bodies within the Sweetwater Watershed include the Sweetwater River, Sweetwater Reservoir, Loveland Reservoir, and San Diego Bay (Project Clean Water 2021b~~).~~).

The project site is currently undeveloped, and completely pervious. As a result, all runoff sheet flows and infiltrates into the ground. Drainage patterns are influenced by local topography. Topography of the project site and adjacent land is hilly, sloping to the south towards South Grade Road. The project site does not currently contain any stormwater drainage facilities.

## Surface Water Quality

The following discussion identifies surface water quality issues facing the two WMAs within which the project site is located. Major ~~issues facing~~impacts on the San Diego River WMA- include surface water quality degradation; habitat degradation and loss; and increased sediment, invasive species, eutrophication, and flooding. Table 4.10-1 includes the water bodies within the project area that are on the Clean Water Act (CWA) 303(d) list. Constituents resulting in water bodies being placed on the CWA 303(d) list include bacterial indicators, phosphorus, and nitrogen (SWRCB 2018). Factors that may impair water quality in the WMA include urban runoff, agricultural runoff, sewage spills, and other natural sources.

The San Diego Bay WMA, which contains the Sweetwater River Watershed, includes water bodies included on the CWA 303(d) list (see Table 4.10-1). Pollutants of concern include aluminum, bacterial indicators, dissolved oxygen, and manganese. Sewer overflows, stormwater runoff, and habitat degradation are all factors that may impair water quality within the San Diego Bay WMA.

The San Diego Basin Plan lists the San Diego River Watershed beneficial surface uses as municipal and domestic supply; agricultural supply; industrial process supply; industrial service supply; contact water recreation; non-contact water recreation; warm freshwater habitat; cold freshwater habitat; wildlife habitat; and wildlife spawning, reproduction, and/or early development. The San Diego Basin Plan lists the Sweetwater River Watershed beneficial surface uses as municipal and domestic supply; agricultural supply; industrial process supply; industrial service supply; contact water recreation; non-contact water recreation; warm freshwater habitat; cold freshwater habitat; wildlife habitat, spawning, reproduction, and/or early development; and rare, threatened, or endangered habitat (San Diego RWQCB 2016).

**Table 4.10-1. Impaired Water Bodies Within the Project Area**

| Watershed | Water Body Name | 303(d) Impairments | Source | Expected TMDL Completion Date |
|---|---|---|---|---|
| Upper San Diego | Alpine Creek | Indicator Bacteria | Unknown | 2029 |
| | Chocolate Creek | Nitrogen, Phosphorus, Indicator bacteria | Unknown | 2025, 2023, 2029 |
| Lower Sweetwater River | Loveland Reservoir | Oxygen (dissolved), Aluminum, Manganese, pH | Unknown | 2019 |
| | Sweetwater River, North Fork | Indicator Bacteria, Manganese | Unknown | 2027, 2025 |

Source: SWRCB 2018.
TMDL = total maximum daily load= total maximum daily load

Unfiltered and untreated stormwater can contain a number of pollutants that may eventually flow to surface waters. The chief cause of urban stormwater pollution is the discharge of inadequately treated waste or pollutants into the natural water system. Discharge may occur naturally or as a result of human activities. Over recent decades, rapid growth and urbanization have placed increased pressure on water resources and resulted in local impacts on water quality, especially in the densely developed western part of the ~~e~~County. In general, increased urbanization increases the amount of pollutants generated by human activities within a watershed and increases the amount of impervious (paved) surfaces, thus reducing the amount of water that would normally infiltrate into the soil and be filtered naturally.

Pollutants, such as fertilizers and pesticides, motor oil, antifreeze, sediment, heavy metals, bacteria, and viruses, that accumulate on impervious surfaces are easily picked up by rainfall runoff and flow downstream via the stormwater conveyance system to surface waters. The stormwater conveyance system is not connected with the sanitary sewer system; therefore, urban runoff is not filtered to remove trash, cleaned, or otherwise treated before it is discharged to surface waters. The typical result is that pollutants are carried directly into surface water by runoff. Surface waters can be polluted by either point sources or non-point sources. A point source is a single, identifiable source of pollution, such as a pipe or drain. Non-point sources of pollution are often termed diffuse pollution and refer to those inputs and impacts that occur over a wide area and are not easily attributed to a single source.

## 4.10.2.2 Existing Groundwater Conditions

The ~~e~~County contains three general categories of aquifers: fractured rock aquifers, alluvial and sedimentary aquifers, and desert basin aquifers. The project site contains fractured rock aquifers and alluvial and sediment aquifers but does not contain desert basin aquifers. Due to the underlying conditions, the project site is not within a recognized California Department of Water Resources (DWR) groundwater basin.

Fractured rock aquifers are present in the foothills and mountainous regions of the ~~e~~County, including the project site, where precipitation is higher than in regions with lower elevations. Fractured rock aquifers typically have much less storage capacity than alluvial or sedimentary aquifers. Additionally, due to the low storage capacity, recharge to fractured rock aquifers can cause relatively fast rises to the water table, which conversely can result in relatively fast declines to the water table due to groundwater pumping in years without significant recharge.

Alluvial aquifers are characterized as structural depressions formed by folding and faulting and/or the effects of differential weathering of rocks often creating incised valleys. These depressions, which are typically bounded by relatively impermeable rocks, are subsequently filled by fine-grained alluvial sediments deposited by streams and rivers. Groundwater typically occurs within the pore spaces of these sediments.

Aquifers with limited groundwater in storage (e.g., fractured rock aquifers) may experience shortages from large groundwater users, such as water companies or districts, agriculture, or other large operations. Wells in a fractured rock aquifer typically yield relatively low volumes of water. Wells in an alluvial or sedimentary aquifer often yield higher volumes of water when compared with fractured rock aquifers.

Potable water in the project area is provided by both water districts and groundwater from residential wells. The project site is located within the Alpine and Alpine Heights Groundwater Basins, but would not depend on groundwater ~~for potable use.~~ The project site is within the San Diego County Water Authority (SDCWA) service boundary. While the SDCWA does not directly provide water service, it is a wholesale water supplier to water districts that serve the area. Padre Dam Municipal Water District, a member agency of the SDCWA, would provide water service to the project site.

### Groundwater Quality

Historically, groundwater supplies within the ~~c~~County have produced high-quality drinking water. However, naturally occurring and anthropogenic sources of contamination have caused the quality of groundwater to be adversely affected in localized areas. The most common contaminants in groundwater within the ~~c~~County include elevated nitrate~~s~~, naturally occurring radionuclides, total dissolved solids (TDS), bacteria, and petroleum products. Near the project site, there are ~~documented~~ groundwater impacts associated with naturally occurring radionuclides (County of San Diego 2011).

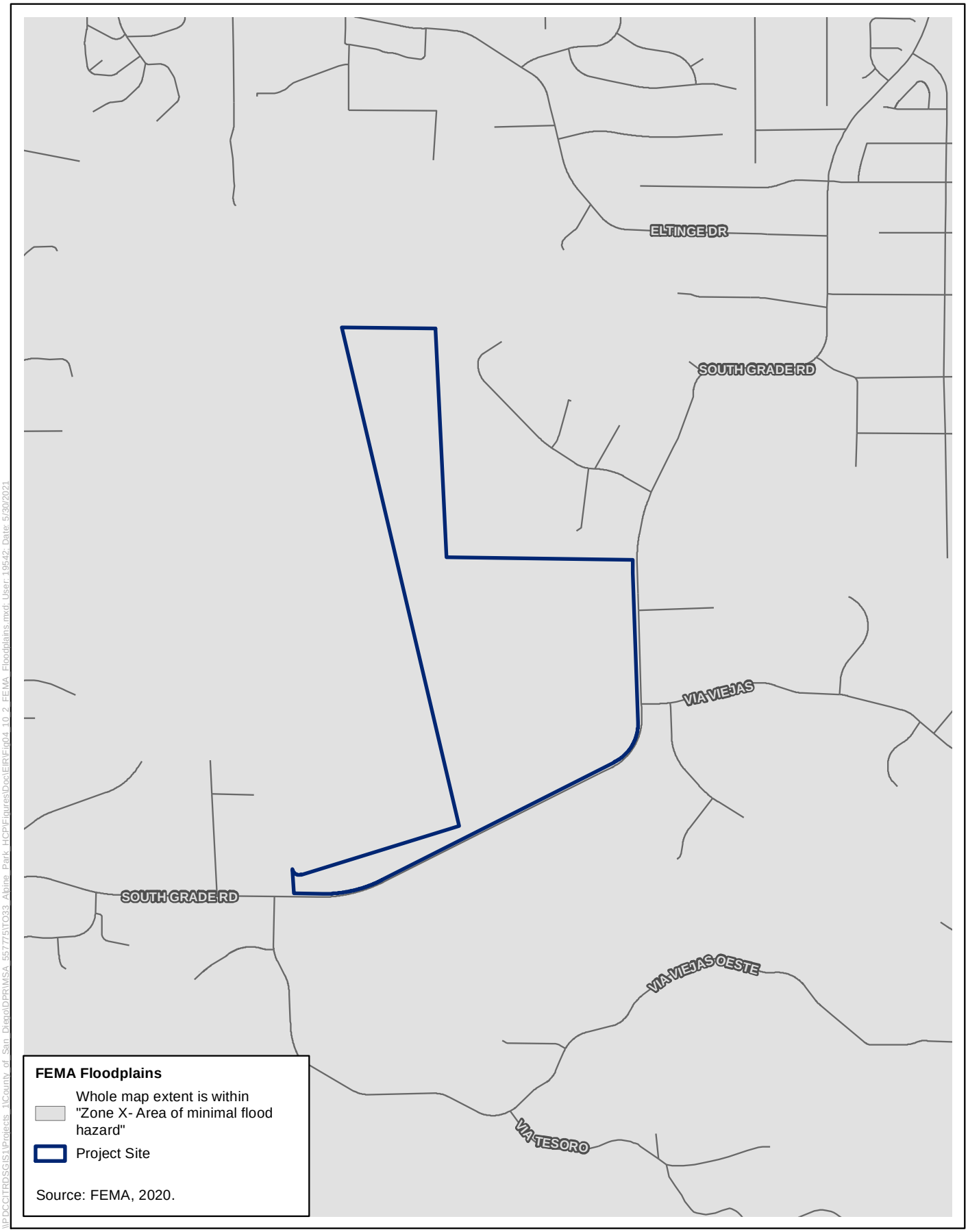
## 4.10.2.3 Water-Related Hazards

### Flooding

Flooding is a general or temporary condition of partial or complete inundation of normally dry land areas. Flooding is commonly associated with the overflow of natural rivers or streams, but can also occur near stormwater facilities, dams, or in low-lying areas not designed to carry water. Flooding can be induced by precipitation or as a result of increased rates and amounts of runoff and altered drainage patterns. As shown on Figure 4.10-2~~,~~, the project site is not located within a floodway; it is located within Zone X, which is defined as an area of minimal flood hazard (FEMA 2012).

Flooding ~~can~~could also result from dam failure, seiches, or tsunamis. Dam inundation is flooding caused by the release of impounded water from ~~a~~ structural failure or overtopping of a dam. ~~The project site is not located in proximity to a dam and therefore is not withina designated County Dam Inundation Zone.~~

Seiches or tsunamis can result from abrupt movements of large volumes of water due to earthquakes, landslides, volcanic eruptions, meteoric impacts, or onshore slope failure. The project site is not within a County Dam Inundation Zone.




\\PDCCITRDSGIS1\Projects_1\County of San Diego\DPRIMSA_557755\TO33 Alpine Park HCP\Figures\Doc\EIR\Fig04_10-2_FEMA_Floodplains.mxd: User: 19542: Date: 5/20/2021

**Figure 4.10-2**
**FEMA Floodplains**
**Alpine Park Project**

A seiche is a standing wave in a completely or partially enclosed body of water~~, such as a lake or reservoir.~~. Areas along the shoreline of a lake or reservoir are ~~therefore~~ susceptible to inundation by a seiche. High winds, seismic activity, or changes in atmospheric pressure are typical causes of seiches. The size of a seiche and the affected inundation area are dependent on different factors including size and depth of the water body; elevation; source; and, if human made, the structural condition of the body of water in which the seiche occurs. The project site is not located near an enclosed body of water where seiche could occur. The project site is approximately 30 miles from the Pacific Ocean (and located in a hilly area) and is therefore not subject to tsunami inundation.

# 4.10.3 Applicable Laws and Regulations

## 4.10.3.1 Federal

### Clean Water Act ~~(CWA)~~

The primary goals of the CWA are to restore and maintain the chemical, physical, and biological integrity of the nation's waters and to make all surface waters fishable and swimmable. The U.S. Environmental Protection Agency (EPA) is the lead federal agency responsible for water quality management. The CWA of 1972 (33 United States Code [USC] 1251–1387) is the primary federal law that governs and authorizes water quality control activities by EPA as well as the states. The federal CWA of 1977 (33 USC Section 1251 et seq.), which amended the federal Water Pollution Control Act of 1972, established the basic structure for regulating discharges of pollutants into the waters of the United States (not including groundwater). Under the CWA, it is unlawful for any person to discharge any pollutant from a point source into navigable waters, unless a National Pollutant Discharge Elimination System (NPDES) permit is obtained and implemented within compliance. In addition, the CWA requires the states to adopt water quality standards for receiving water bodies and to have those standards approved by EPA. Water quality standards consist of designated beneficial uses for a particular receiving water body (e.g., wildlife habitat, agricultural supply, fishing), along with water quality criteria necessary to support those uses.

#### Section 303: Impaired Water Bodies (303(d) list) and Total Maximum Daily Loads

Under Section 303(d) of the CWA, the State Water Resources Control Board (SWRCB) is required to develop a list of impaired water bodies that do not meet water quality standards (promulgated under the National Toxics Rule [NTR] or the California Toxics Rule [CTR]) after the minimum technology-based effluent limitations have been implemented for point sources. Lists are to be priority ranked for development of a total maximum daily load (TMDL), which is a calculation of the total maximum amount of a pollutant that a water body can receive on a daily basis and still safely meet water quality standards. The California Regional Water Quality Control Boards (RWQCBs) and EPA are responsible for establishing TMDL waste-load allocations and incorporating improved load allocations into water quality control plans, NPDES permits, and waste discharge requirements. Section 305(b) of the CWA requires that states assess the status of water quality conditions within the state in a report to be submitted every 2 years.

Both CWA requirements are being addressed through the development of a 303(d)/305(b) Integrated Report, which will address both an update to the 303(d) list and a 305(b) assessment of statewide water quality. The current California Integrated Report is the 2014/2016 version,

approved by the EPA on April 6, 2018. The SWRCB developed a statewide 2018 California Integrated Report based upon the Integrated Reports from each of the nine RWQCBs. The 2018 California Integrated Report was submitted to the EPA February 12, 2021 and is still in progress.

All of the 303(d) listed impaired waters with potential to be affected by the project will be evaluated as part of the project, and applicable BMPs and minimization measures identified in the SWPPP prepared for the project would be implemented to protect waters from further water quality impairment.

### National Flood Insurance Program

The Federal Emergency Management Agency (FEMA) administers the National Flood Insurance Program to provide subsidized flood insurance to communities that comply with FEMA regulations limiting development in floodplains. FEMA also issues flood insurance rate maps (FIRMs) that identify which land areas are subject to flooding. These maps provide flood information and identify flood hazard zones in the community. FEMA also publishes a boundary map of flood hazards, including the 100-year floodplain, in those areas in connection with the National Flood Insurance Program. The design standard for flood protection is established by FEMA. FEMA's minimum level of flood protection for new development is the 100-year flood event, also described as a flood that has a 1-in-100 chance of occurring in any given year. FEMA allows non-residential development in the floodplain; however, construction activities are restricted within the flood hazard areas, depending on the potential for flooding within each area.

## 4.10.3.2 State

### The Porter-Cologne Water Quality Control Act

The Porter-Cologne Water Quality Control Act (embodied in the California Water Code) of 1969 (Porter-Cologne Act) is California's statutory authority for the protection of water quality. Under the Porter-Cologne Act, the ~~s~~State must adopt water quality policies, plans, and objectives that protect its waters for the use and enjoyment of the people. Under the California Water Code, the State of California is divided into nine regions governed by RWQCBs that, under the guidance and review of the SWRCB, implement and enforce provisions of the California Water Code and the CWA. The project site is located in Region 9, the San Diego Region, and governed by the San Diego RWQCB.

The Porter-Cologne Act also requires waste dischargers to notify the RWQCBs of their activities through the filing of Reports of Waste Discharge and authorizes the SWRCB and RWQCBs to issue and enforce waste discharge requirements, NPDES permits, Section 401 water quality certifications, or other approvals.

Section 13050 of the California Water Code defines what is considered pollution, contamination, or nuisance. Briefly defined, *pollution* means an alteration of water quality such that it unreasonably affects the beneficial uses of water. *Contamination* means an impairment of water quality to the degree that it creates a hazard to public health. *Nuisance* is defined as anything that is injurious to health, is offensive to the senses, or is an obstruction to property use, and which affects a considerable number of people.

### Construction Storm Water Permit and Storm Water Pollution Prevention Plan

Construction activities that disturb 1 acre or more of land must obtain coverage under the SWRCB Construction General Permit (Order 2009-0009-DWQ as amended by Order 2010-0014-DWQ and Order 2012-006-DWQ). Under the terms of the permit, applicants must file complete and accurate Notice of Intent and Permit Registration Documents with the SWRCB. Applicants must also demonstrate conformance with applicable construction best management practices (BMPs) and prepare a construction Storm Water Pollution Prevention Plan (SWPPP) containing a site map that shows the construction site perimeter, existing and proposed buildings, lots, roadways, stormwater collection and discharge points, general topography both before and after construction, and drainage patterns across the project site. The SWPPP would also include a description of proposed construction activities, along with a demonstration of compliance with relevant local ordinances and regulations, and an overview of the BMPs that would be implemented to prevent soil erosion and discharge of other construction-related pollutants that could contaminate nearby water resources. Permittees are further required to conduct annual monitoring and reporting to ensure that BMPs are correctly implemented and effective in controlling the discharge of stormwater-related pollutants.

The project would be required to comply with the Construction General Permit because it would disturb over 1 acre during construction.

## 4.10.3.3 Regional

### Water Quality Control Plan (Basin Plan)

The preparation and adoption of water quality control plans (Basin Plans) is required by the California Water Code (Section 13240) as prescribed by the CWA. Section 303 of the CWA requires states to adopt water quality standards that "consist of the designated uses of the navigable waters involved and the water quality criteria for such waters based upon such uses." According to Section 13050 of the California Water Code, Basin Plans consist of a designation or establishment of beneficial uses to be protected, water quality objectives to protect those uses, and a program of implementation needed for achieving the objectives for the waters within a specified area. Because beneficial uses, together with their corresponding water quality objectives, can be defined per federal regulations as water quality standards, the Basin Plans are regulatory references for meeting the state and federal requirements for water quality control. The project site is located within the jurisdiction of the San Diego RWQCB, and the relevant Basin Plan for the region is the *Water Quality Control Plan for the San Diego Basin.*

#### Beneficial Uses

The San Diego RWQCB has designated Beneficial Uses and Water Quality Objectives for water bodies under its jurisdiction (San Diego RWQCB 2016). They are defined as the uses of water necessary for the survival or well-being of humans, plants, and wildlife. These uses of water serve to promote the tangible and intangible economic, social, and environmental goals of humankind. Examples include drinking, swimming, industrial, and agricultural water supply, and the support of fresh and saline aquatic habitats (San Diego RWQCB 2016).

Because of the project site's location, the receiving waters include the Sweetwater River, and Loveland Reservoir, the designated beneficial uses of which include the following.

- Industrial Service Supply (IND) includes use of water for industrial activities that do not depend primarily on water quality including, but not limited to, mining, cooling water supply, hydraulic conveyance, gravel washing, fire protection, or oil well re-pressurization.
- Contact Water Recreation (REC1) includes uses of water for recreational activities that involve body contact with water, where ingestion of water is reasonably possible. These uses include, but are not limited to, swimming, wading, water-skiing, skin and SCUBA diving, surfing, white water activities, fishing, or the use of natural hot springs.
- Non-contact Water Recreation (REC2) includes the uses of water for recreational activities involving proximity to water, but not normally involving body contact with water, where ingestion of water is reasonably possible. These uses include, but are not limited to, picnicking, sunbathing, hiking, beachcombing, camping, boating, tidepool and marine life study, hunting, sightseeing, or aesthetic enjoyment in conjunction with the above activities.
- Cold Freshwater Habitat (COLD) includes uses of water that support cold water ecosystems including, but not limited to, preservation or enhancement of aquatic habitats, vegetation, fish, or wildlife, including invertebrates.
- Warm Freshwater Habitat (WARM) includes uses of water that support warm water ecosystems including, but not limited to, preservation or enhancement of aquatic habitats, vegetation, fish or wildlife, including invertebrates.
- Wildlife Habitat (WILD) includes uses of water that support terrestrial ecosystems including, but not limited to, preservation and enhancement of terrestrial habitats, vegetation, wildlife, or wildlife water and food sources.
- Industrial Process Supply (PROC) includes uses of water for industrial activities that depend primarily on water quality.
- Municipal and Domestic Supply (MUN) includes uses of water for community, military, or individual water supply systems including, but not limited to, drinking water supply.
- Agricultural Supply (AGR) includes uses of water for farming, horticulture, or ranching including, but not limited to, irrigation, stock watering, or support of vegetation for range grazing.

## Water Quality Objectives

The Basin Plan sets narrative and numerical water quality objectives that must be attained or maintained to protect beneficial uses and conform to the ~~s~~State's degradation policy. The water quality objectives are the levels of water quality constituents that must be met to protect the beneficial uses (San Diego RWQCB 2016). Table 4.10-2 includes a summarized list of these water quality constituents that received narrative or numerical concentration objectives. Surface water quality objectives for the El Capitan HA and Upper Sweetwater HA are shown in Table 4.10-3. A complete and detailed list of water quality constituents and objectives can be found in the Basin Plan. Each water quality constituent may result in varied objectives conditional on the beneficial use of the waters.

**Table 4.10-2. Water Quality Constituents**

| | |
|---|---|
| Bacteria – Total coliform, fecal coliform, E. Coli, and enterococci | Pesticides |
| Biostimulatory Substances | pH |
| Boron | Phenolic Compounds |
| Chlorides | Radioactivity |
| Color | Secondary Drinking Water Standards |
| Dissolved Oxygen | Sediment |
| Floating Material | Sodium |
| Fluoride | Sulfate |
| Inorganic Chemicals | Suspended and Settleable Solids |
| Iron | Tastes and Odors |
| Manganese | Temperature |
| Methylene Blue–Activated Substances | Total Dissolved Solids |
| Nitrate | Toxicity |
| Oil and Grease | Toxic Pollutants |
| Organic Chemicals | Trihalomethanes |
| ~~Pesticides~~ | Turbidity |

Source: San Diego RWQCB 2016

**Table 4.10-3. Surface Water Quality Objectives**

| | Constituent (mg/L or as noted) | | | | | | | | | | | | |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Surface Water Feature | TDS | Cl | $SO_4$ | % N | N&P | Fe | Mn | MBAS | B | ODOR | Turb NTU | Color Units | F |
| El Capitan HA | 300 | 50 | 65 | 60 | a | 0.3 | 0.05 | 0.5 | 1.0 | None | 20 | 20 | 1.0 |
| Upper Sweetwater HA | 500 | 250 | 250 | 60 | a | 0.3 | 0.05 | 0.5 | 0.75 | None | 20 | 20 | 1.0 |

Source: San Diego RWQCB 2016
B = boron; Cl = chlorine; F = fluoride; Fe = iron; HA = hydrologic area; MBAS = methlylene blue activated substances; mg/L = milligrams per liter; Mn = manganese; N = nitrogen; N&P = nitrogen and phosphorus; $SO_4$ = sulfate; Turb NTU = turbidity (reported in nephelometric turbidity units).

## Water Quality Control Policy for Siting, Design, Operation, and Maintenance of Onsite Wastewater Treatment Systems

Dewatering requirements are imposed by the San Diego RWQCB general waste discharge requirements for discharges from temporary groundwater extraction and similar waste discharges (Order No. R9-2015-0013). To obtain coverage under this order, a discharger must submit a complete Notice of Intent application package to the San Diego RWQCB office at least 60 days before proposed commencement of the discharge. ~~The~~ County DPW would be required to maintain compliance with the effluent limitations applicable to the receiving water, as specified in Order No. R9-2015-0013 (refer to Table 5 of the order). In addition, Order No. R9-2015-0013 identifies the monitoring and reporting program requirements. The purpose of the monitoring and reporting program is to determine and ensure compliance with effluent limitations and other requirements established in the order, assess treatment efficiency, characterize effluents, and characterize the receiving water and the effects of the discharge on the receiving water. The San Diego RWQCB may specify increased monitoring requirements as necessary to ensure that applicable water quality objectives are maintained in the receiving water. Any dewatering or construction-related non-stormwater discharges would be controlled in compliance with the San Diego RWQCB permit for dewatering. The permit requires permittees to conduct monitoring of dewatering discharges and

adhere to effluent and receiving water limitations contained within the permit so that water quality of surface waters is protected.

On June 19, 2012, the SWRCB adopted Resolution No. 2012-0032, the Onsite Wastewater Treatment Systems (OWTS) Policy, which establishes a statewide, risk-based, tiered approach for the regulation and management of OWTS installations and replacements and sets the level of performance and protection expected from OWTS. In accordance with California Water Code Section 13290 et seq., the OWTS Policy sets standards for OWTS that are constructed or replaced, that are subject to a major repair, that pool or discharge waste to the surface of the ground, and that have affected, or will affect, groundwater or surface water to a degree that makes it unfit for drinking water or other uses, or cause a health or other public nuisance condition. The OWTS Policy also includes minimum operating requirements for OWTS that may include siting, construction, and performance requirements; requirements for OWTS near certain waters listed as impaired under Section 303(d) of the CWA; requirements authorizing local agency implementation of the requirements; corrective action requirements; minimum monitoring requirements; exemption criteria; requirements for determining when an existing OWTS is subject to major repair; and a conditional waiver of waste discharge requirements. The SWRCB approved the San Diego RWQCB's Nitrate/OWTS Policy Basin Plan amendment on November 17, 2015. The Office of Administrative Law approved the RWQCB's Nitrate/OWTS Policy Basin Plan amendment on May 17, 2016.

## 4.10.3.4 Local

### Phase I Regional Municipal Separate Storm Sewer System (MS4) Program

The San Diego RWQCB regulates discharges from Phase I municipal separate storm sewer systems (MS4s) in the San Diego Region under the Regional MS4 Permit. The Regional MS4 Permit expired on June 27, 2018, but remains in effect under an administrative extension until it is reissued by the San Diego RWQCB. The Regional MS4 Permit covers 39 municipal, county government, and special district entities (referred to jointly as copermittees) located in ~~San Diego~~the County, southern Orange County, and southwestern Riverside County who own and operate large MS4s that discharge stormwater runoff and non-stormwater runoff to surface waters throughout the San Diego region.

The MS4 Permit establishes separate performance standards for (1) source control and site design practices, (2) stormwater pollutant control BMPs, and (3) hydromodification management BMPs. Each development project must be designed to satisfy any of several potentially applicable performance standards. Performance standards are specific design objectives to be achieved through the implementation of BMPs.

### County of San Diego Jurisdictional Runoff Management Program

The County's Jurisdictional Runoff Management Program (JRMP), approved on July 26, 2015, was prepared in response to regulatory requirements adopted by the RWQCB. The purpose of the JRMP document is to guide implementation of programs and strategies to reduce pollutants discharged from the County's storm drain system to receiving waters.

The goal of the JRMP is to establish a programmatic framework for the implementation of stormwater management activities in accordance with Water Quality Improvement Plan strategies and other jurisdictional plans, design standards, and ordinances. By providing and implementing

programs for new land development and redevelopment projects, impacts on receiving waters and other environmental resources are minimized. The JRMP also complies with federal and ~~s~~State laws.

## County of San Diego BMP Design Manual

Updated in September 2020, the County's *BMP Design Manual* guides land development and public improvement projects in the unincorporated area to reach compliance with the Regional ~~Municipal Separate Storm Sewer System (~~MS4~~)~~ Permit and reduce the discharge of pollutants in stormwater to the maximum extent practicable (County 2020). It is focused on project design requirements and related post-construction requirements and provides guidance on which stormwater management requirements apply to a given project; defines the performance standards for source control and site design BMPs, stormwater pollution control BMPs, and hydromodification management BMPs based on the Regional MS4 Permit; outlines the required steps to the comprehensive stormwater management design process; contains the source control and site design requirements applicable to all development; outlines the process of determining which category of onsite pollution control BMP or combination of BMPs is most appropriate for a given project and how those BMPs should be designed; provides guidance for meeting the performance standards for the two components of hydromodification management: protection of critical coarse sediment yield areas and flow control for post-project runoff; and describes the long-term maintenance requirements for structural BMPs.

The *BMP Design Manual* established the minimum BMP requirements applicable to all development projects, regardless of size or type. These measures include general BMP siting, source control BMPs, and site design BMPs. The County's 2013 MS4 Permit requires copermittees to impose additional requirements on those projects considered Priority Development Projects (PDPs), which are required to comply with structural BMP performance requirements specified in the *BMP Design Manual*. These additional requirements focus on retention of the 85th percentile storm event. If onsite retention is not feasible, other alternatives are available, including partial retention and biofiltration. PDPs are also required to comply with hydromodification management BMP requirements, as specified in the *BMP Design Manual*, which address flow duration impacts and critical sediment yield areas. All projects must meet the following general requirements:

- Onsite BMPs must be located so as to remove pollutants from runoff prior to its discharge to any receiving waters, and as close to the source as possible;
- Structural BMPs must not be constructed within waters of the U.S.; and
- Onsite BMPs must be designed and implemented with measures to avoid the creation of nuisance or pollution associated with vectors (e.g., mosquitos, rodents, or flies).

All projects must complete a Storm Water Intake Form to determine if they are a development project and to assess their priority and project type. The Storm Water Intake Form determines which type of Stormwater Quality Management Plan (SWQMP) Form is required for each development project.

Baseline Source Control and Site Design BMPs must be implemented for all development projects wherever it is applicable and feasible to do so. These BMPs help to prevent the onsite generation of pollutants and flows and to keep them from leaving the site. Source control BMPs and site design practices must be implemented at all development projects where applicable and feasible.

An Enhanced Site Design BMP is any site design BMP used specifically to reduce the Design Capture Volume (DCV) within a Drainage Management Area (DMA). This can be achieved either by adjusting

the impervious runoff factor of one or more surfaces or by implementing BMPs that receive and mitigate a portion of the DCV. Because DCV reduction is not required, this performance standard is optional.

However, implementation of Enhanced Site Design BMPs is strongly encouraged for all PDPs as a means of reducing or eliminating the need for other, more complex or costly BMPs needed to satisfy Structural Performance Standards for the remaining DCV.

Structural Performance Standards are numeric design standards for reducing or eliminating stormwater flows and pollutant loads from PDP sites. They specifically address the remaining volume of runoff within a DMA (either the DCV or a greater volume) after the application of all other site design and source control BMPs described above. Storm Water Pollutant Control BMPs for PDPs must meet the appropriate performance standards.

For many PDP sites, additional BMPs may be needed to preserve the supply of critical coarse sediment to water bodies. Any PDP that is not exempt from hydromodification management requirements must either comply with critical coarse sediment requirements or demonstrate that they do not apply.

## County of San Diego Low Impact Development Handbook

The County's *Low Impact Development Handbook—Stormwater Management Strategies* (County DPW 2014) was created in 2007 and updated in July 2014 by a multidisciplinary Technical Advisory Committee. The goal of the County Low Impact Development (LID) Program is to protect water quality by preserving and mimicking natural hydrologic functions through the use of stormwater planning and management techniques on a project site. The purpose of the *LID Handbook* is to provide a comprehensive list of LID planning and stormwater management techniques for developers, builders, contractors, planners, landscape architects, engineers, and government employees as guidance to reference before developing a project site. The document serves as a guidance document for the planning, application, design, and maintenance of LID BMPs. LID feasibility and applicability criteria and specific LID requirements are specified in the *BMP Design Manual*.

## County of San Diego Code of Regulatory Ordinances Sections 67.801–67.814, Watershed Protection, Stormwater Management, and Discharge Control Ordinance

The current Watershed Protection, Stormwater Management, and Discharge Control Ordinance (WPO) was adopted in March 2008 and amended in January 2016. The stated purposes of this ordinance are to protect the health, safety, and general welfare of ~~county~~ residents in the unincorporated area; to protect water resources and improve water quality; to cause the use of management practices by the County and its citizens that will reduce the adverse effects of polluted runoff discharges on waters of the State; to secure benefits from the use of stormwater as a resource; and to ensure the County ~~of San Diego~~ is compliant with applicable ~~s~~State and federal law. The WPO contains discharge prohibitions and requirements that vary depending on type of land use activity and location in ~~the county.~~San Diego County. The WPO defines the requirements legally enforceable by the County in its unincorporated areas.

In accordance with the WPO, the County requires the development of a SWQMP to be submitted with discretionary and ministerial permit applications. The purpose of the SWQMP is to mitigate

stormwater impacts by identifying effective permanent BMPs for implementation. The SWQMP review process takes into account the project location, receiving water quality, anticipated project impacts and associated pollutants, and mitigation for impacts with the selection of BMPs. The SWQMP provides needed information to address both stormwater and non-stormwater issues. The Preliminary Grading Plan and Preliminary Hydrology/Drainage Study are an integral part of the SWQMP and provide the technical basis for the SWQMP. The SWQMP requires, but is not limited to, the following elements:

- Water quality pollutants of concern, treatment volume based on water quality design storm, site plans and adjacent land use, and soil characteristics.
- Mitigation measures to protect water quality, pollution prevention BMPs (maximum extent practicable [MEP] Based), site design BMPs, source control BMPs, LID BMPs, and structural treatment BMPs.
- Mitigation measures to prevent increases in downstream erosion to MEP, site design BMPs, source control BMPs, LID BMPs, and structural treatment BMPs.
- Any infiltration BMPs proposed for use on site.
- Agreements, easements, and licenses relating to proposed BMP construction, location, maintenance, or changes in drainage character.

As defined in the WPO, each project is required to implement measures to ensure that (1) pollutant discharges and runoff flows from development are reduced to the maximum extent practicable, (2) receiving water quality objectives are not violated throughout the life of the project, and (3) runoff flows from development are managed to reduce erosive forces that may impact surface water beneficial use and/or habitat.

The WPO also contains LID requirements. LID is a stormwater management approach that maintains the natural hydrologic character of a site or region by using design techniques that infiltrate, filter, store, evaporate, and detain runoff on site. A *LID Handbook* was developed in December 2007 by ~~the~~ County DPW to provide the development community with guidance on implementing LID strategies and practices (County DPW 2014). The WPO has incorporated LID site design BMP requirements in Section 67.806, General Best Management Practice Requirements, to be applicable to all development projects with the potential to add pollutants to stormwater or to affect the flow rate or velocity of stormwater runoff. This requirement defines the general standard for LID site design. The more explicit LID site design requirements for PDPs have been included in Section 67.810/67.811, Additional Planning, Design and Post-Construction Requirements for Development Projects. The *BMP Design Manual* includes a discussion of LID Site Design requirements.

All construction sites determined to be a land disturbance activity, as defined in the WPO, are required to meet General BMP Requirements (Attachment 2.2 of Section 67.806) and the Additional BMP Requirements for Construction Projects (Section 67.809). Section 67.806 (Attachment 2.2) of the WPO includes the list of general BMP requirements applicable to all dischargers. Section 67.809 (Attachment 2.2) of the WPO includes the list of additional BMPs to be implemented and maintained for construction projects. At a minimum, the County has determined that the following pollution control practices be adequately implemented and maintained year-round on all non-exempt projects:

- Project Planning.
- Good Site Management “Housekeeping,” including waste management.

- Non-stormwater Management.
- Erosion Control.
- Sediment Control.
- Run-on and Run-off Control.
- Active/Passive Sediment Treatment Systems, where applicable.
- Any other construction BMPs suggested by the applicable Water Quality Improvement Plan and deemed to be effective at controlling erosion and sedimentation.

Disturbed soil areas are considered active whenever soil-disturbing activities have occurred, continue to occur, or will occur during the ensuing 14 days. Non-active areas must be protected within 14 days of cessation of soil-disturbing activities or prior to the onset of precipitation, whichever occurs first.

### County of San Diego Code of Regulatory Ordinances Section 91.1.105.10, Flood Damage Prevention Ordinance

This ordinance was established to promote the public health, safety, and general welfare, and to minimize public and private losses due to flood conditions in specific areas throughout the County ~~of San Diego.~~ This ordinance defines methods to accomplish the goals of reducing flood losses, including: restricting uses which are dangerous to health, safety, and property due to erosion or water hazards; requiring uses vulnerable to floods to be protected against flood damage at the time of construction; controlling the alteration of natural flood plains; controlling filling, grading, or dredging, which may increase flood damage; and preventing construction of flood barriers that will divert flood waters or increase flood hazards in other areas.

# 4.10.4 Project Impact Analysis

## 4.10.4.1 Methodology

The project includes the development of Alpine Park and associated trails (an active park) as well as the conservation of approximately 70 acres of open space ~~/preserve~~. The analysis that follows evaluates the project's effects on existing hydrology and water quality conditions. Based on these existing conditions, the analysis assesses the direct and indirect impacts related to hydrology and water quality using the thresholds presented below.

## 4.10.4.2 Thresholds of Significance

### Appendix G of the ~~State~~ CEQA Guidelines

The following significance criteria are based on Appendix G of the ~~State~~ CEQA Guidelines and provide the basis for determining the significance of impacts associated with hydrology and water quality resulting from implementation of the project. The determination of whether a hydrology and water quality impact would be significant is based on the professional judgment of ~~the~~ County DPR as lead agency supported by the evidence in the administrative record.

Impacts are considered significant if the project would result in any of the following:

1. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality.
2. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.
3. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or through the addition of impervious surfaces in a manner which would:

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

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

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

   (iv) impede or redirect flood flows.
4. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation.
5. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

## County of San Diego Guidelines for Determining Significance

The CEQA thresholds provided by the *County of San Diego Guidelines for Determining Significance for Hydrology and Water Quality* (County of San Diego 2021) state that a project will generally be considered to have a significant effect if it proposes any of the following, absent specific evidence to the contrary. Conversely, if a project does not propose any of the following, it will generally not be considered to have a significant effect on hydrology, absent specific evidence of such an effect. The following questions were developed as guidance to address the questions listed in the ~~State~~ CEQA Guidelines, Appendix G, VIII. Hydrology and Water Quality:

1. The project will substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site.
2. The project will 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, San Dieguito River, San Diego River, Sweetwater River and Otay River, 2/10 of a foot or more in height.
3. The project will result in increased velocities and peak flow rates exiting the project site that would cause flooding downstream or exceed the stormwater drainage system capacity serving the site.
4. The project will result in placing housing, habitable structures, or unanchored impediments to flow in a 100-year floodplain area or other special flood hazard area, as shown on a FIRM, a County Flood Plain Map or County Alluvial Fan Map, which would subsequently endanger health, safety and property due to flooding.

5. The project will place structures within a 100-year flood hazard or alter the floodway in 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; 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, San Dieguito River, San Diego River, Sweetwater River and Otay River 2/10 of a foot or more in height.

## 4.10.4.3 Project Impacts and Mitigation Measures

***Threshold 1: Implementation of the project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality.***

### County Park and Trails

#### Impact Discussion

**Construction**

Construction of the project would include activities that would disturb surface soils, such as grading, leveling, and trenching. During construction, approximately 21.75 acres of grading would occur at the project site and approximately 47,200 cubic yards of soil would be excavated. Exposed soils have the potential to temporarily increase the amount of sediment in runoff from the project site during a storm event. Project construction would also involve use of motorized heavy equipment such as trucks and dozers that require fuel, lubricating grease, and other fluids. Accidental chemical release or spill from a vehicle or equipment could affect surface water. These construction activities could also generate dust, settlement, litter, oil, and other pollutants that could temporarily contaminate water run-off from the project site.

Other potential water quality impacts include chemical spills into storm drains or groundwater aquifers if proper minimization measures are not implemented. However, required BMPs would be implemented to reduce pollutants in stormwater and other nonpoint-source runoff. Measures range from source control to treatment of polluted runoff. BMPs can include watering active construction areas to control dust generation during earthmoving activities and installing erosion control measures (such as silt fences, staked straw bales/wattles, silt/sediment basins and traps, check dams, geofabric, and sandbag dikes) to prevent silt runoff to public roadways or waterways. As appropriate, disturbed soil would be revegetated as soon as possible with the appropriate selection and schedule of plants.

The project would disturb over 1 acre of land; therefore, it would be required to obtain an NPDES General Construction Permit from the SWRCB. Compliance with the General Construction Permit would require the preparation of a SWPPP for the project site. The SWPPP would identify potential pollutants and outline the BMPs that would be implemented during construction activities to prevent those pollutants from entering nearby water bodies.

In addition, the project would be subject to the County's existing regional waste discharge requirements. Under the requirement the project site would be required to implement site design measures and/or source control BMPs and/or treatment control BMPs to reduce potential pollutants to the maximum extent practicable from entering stormwater runoff that would be consistent with the County's JRMP and *BMP Design Manual.* These measures would enable the project to meet waste discharge requirements for discharges to surface water as required.

During onsite grading and construction activities, hazardous materials (e.g., fuels, paints, solvents, concrete additives, etc.) could be used and therefore would require proper management and, in some cases, disposal. The management of any resultant hazardous wastes could increase the opportunity for hazardous materials releases into groundwater. However, compliance with all applicable federal, ~~s~~State, and local requirements concerning the handling, storage, and disposal of hazardous waste would effectively reduce the potential for the construction of the project to release contaminants into groundwater that could result in groundwater contamination or cause the violation of regulatory water quality standards.

Discharge of groundwater into storm drains and receiving waters has the potential to significantly affect water quality. No groundwater dewatering is anticipated for construction of the project that could impact groundwater quality. However, in the event groundwater dewatering is required, the project would comply with dewatering requirements imposed by the San Diego RWQCB general waste discharge requirements for discharges from temporary groundwater extraction and similar waste discharges (Order No. R9-2015-0013). Compliance with the applicable dewatering permit would further ensure that the impacts of these discharges would be less than significant.

**Operation**

During operation, one proposed wastewater option includes the discharge of domestic waste to an OWTS. Discharged wastewater must conform to the RWQCB's applicable standards, including the Regional Basin Plan and the California Water Code. California Water Code Section 13282 allows RWQCBs to authorize a local public agency to issue permits for OWTS "to ensure that systems are adequately designed, located, sized, spaced, constructed and maintained." The RWQCBs has authorized Department of Environmental Health and Quality (DEHQ) to issue certain OWTS permits throughout the ~~county and within the incorporated cities.~~County. DEHQ will review the OWTS layout for the project pursuant to DEHQ, Land and Water Quality Division's, On-site Wastewater Systems: Permitting Process and Design Criteria. DEHQ would also be the approving body for the project's OWTS. Therefore, if implemented, the onsite sewer advanced treatment system would not violate waste discharge requirements, as determined by the RWQCB-authorized local public agency, DEHQ.

The site for the proposed active park encompass~~es~~ approximately 25 acres, which is currently ~~a~~ pervious area. The project would ~~change~~alter approximately 7.8 acres of the active park site to ~~become~~ impervious areas (Howard Pierce 2021). Most of the~~ created~~ impervious surface is associated with the proposed parking areas. Typical pollutants associated with parking include heavy metals. Increased runoff from the new impervious surfaces would contribute to non-point source pollution in surface water. None of the existing impairments in nearby water bodies are related to heavy metals (i.e., the pollutant typical of parking areas). Stormwater retention basins would be located throughout the park. The basins would manage and treat stormwater and reduce polluted stormwater runoff from being conveyed into receiving waters.

As identified in Section 4.10.3, *Applicable Laws and Regulations*, the County's JRMP, *BMP Design Manual*, *LID Handbook*, and WPO require each project to implement measures to ensure that (1) pollutant discharges and runoff flows from development are reduced to the maximum extent practicable, (2) receiving water quality objectives are not violated throughout the life of the project, and (3) runoff flows from development are managed to reduce erosive forces that may impact surface water beneficial use and/or habitat. In accordance with the WPO and *BMP Design Manual*, the County requires the development of an SWQMP to mitigate stormwater impacts by identifying effective LID features and permanent BMPs for implementation. The SWQMP is prepared for essentially all actions associated with increases to impervious surfaces and would be required for the project.

### Impact Determination

With adherence to the County's JRMP, *BMP Design Manual*, *LID Handbook*, and WPO, the project would not violate any water quality standards or waste discharge requirements, and, as such, impacts would be less than significant.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

Impacts would be less than significant.

## Open Space~~/Preserve~~

### Impact Discussion

The proposed open space~~/preserve~~ component of the project would not include activities that would disturb surface soils, which would have the potential to temporarily increase the amount of sediment in runoff from the project site during a storm event. Operational activities associated with the open space~~/preserve~~ component of the project would remain similar to existing use of the area, which includes existing trails for activities such as hiking, biking, and horseback riding.

### Impact Determination

The proposed open space~~/preserve~~ area would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality during construction or operation. Therefore, impacts would be less than significant.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

Impacts would be less than significant.

***Threshold 2: Implementation of the project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.***

## County Park and Trails and Open Space~~/Preserve~~

## Impact Discussion

The project would obtain its water supply from the Padre Dam Municipal Water District, which purchases water from the ~~San Diego~~ County Water Authority. ~~San Diego~~ County Water Authority supplies include water purchased from the Metropolitan Water Authority, Colorado River water, and desalinated water. The project would not use any groundwater for irrigation or domestic or commercial use demands. However, in certain cases, groundwater may be used in the event of a wildland fire on the project site. Discrete use of groundwater for emergency situations would not result in a substantial decrease in groundwater supplies or interfere substantially with groundwater recharge. In addition, the project does not involve operations that would interfere substantially with groundwater recharge such as regional diversion of water to another groundwater basin or diversion or channelization of a stream course or waterway with impervious layers, such as concrete lining or culverts, for substantial distances (e.g., 0.25 mile). These activities and operations can substantially affect rates of groundwater recharge.

While the project would result in an increase in the amount of impervious surface that would potentially affect groundwater recharge, it would not interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level. In addition, the project would include implementation of a bio-retention basin that would allow ground recharge during operations. Further, project BMPs such as landscaped areas, berms, and stormwater retention basins would infiltrate and capture runoff such that an increase in impervious surfaces would not substantially change existing conditions. Similar to existing conditions, stormwater runoff would continue to infiltrate, allowing for groundwater recharge. As such, groundwater recharge would not be reduced by the project. The project does not include any wells to pump groundwater.

### Impact Determination

Impacts related to substantial decreases of groundwater supplies and recharge would be less than significant. Therefore, the project would not interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

Impacts would be less than significant.

***Threshold 3: Implementation of the project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or through the addition of impervious surfaces in a manner which would:***

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

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

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

***(iv) impede or redirect flood flows.***

## County Park and Trails

### Impact Discussion

#### i. Result in substantial erosion or siltation on-or off-site

The project would develop an active park in an area that is currently undeveloped. During construction, stormwater drainage patterns could be temporarily altered due to site grading, preparation, and excavation activity, resulting in temporary erosion impacts. Based on the FEMA Flood Map for the project area, the project site is not located within a floodway; it is located within Zone X, which is defined as an area of minimal flood hazard (FEMA 2012). Although flooding that could result in substantial erosion or siltation is not anticipated, the project would result in an increase of 7.8 acres of impervious surface, which would increase the potential for erosion or siltation. New impervious surfaces would include parking areas, restroom facilities, an administrative facility/ranger station, basketball courts, pickleball courts, and ~~a skate~~an all-wheel park and a bike skills area. All other project components would be constructed with pervious materials. As previously discussed, a SWQMP would be prepared for the project site, which would contain site-specific design measures, source control, and/or treatment control BMPs such as landscaped areas, berms, and stormwater retention basins to reduce potential pollutants, including sediment from erosion or siltation, to the maximum extent practicable from entering stormwater runoff. Measures required by the Construction General Permit would also limit site runoff during construction, would not alter stormwater drainage patterns, and would help manage erosion and sedimentation. These measures would control erosion and sedimentation and satisfy waste discharge requirements as required by the Land-Use Planning for New Development and Redevelopment Component of the ~~San Diego Municipal Permit~~MS4 (San Diego RWQCB Order No. R9-2013-0001), as implemented by the County's JRMP and *BMP Design Manual*. The SWQMP would specify and describe the implementation process of all BMPs that would address equipment operation and materials management, prevent the erosion process from occurring, and prevent sedimentation in any on site and downstream drainage swales. The DPW would ensure that the project is implemented as proposed (in compliance with the County of San Diego Watershed Protection Ordinance and regional MS4 Permit), which would ensure the project would not result in

significantly increased erosion or sedimentation potential and would not alter any drainage patterns of the site or area on- or off-~~-~~site.

**ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or ~~offsite~~off-site**

Construction of the project would involve activities that may temporarily alter drainage patterns, such as grading and trenching. However, these would be temporary, and construction BMPs would be implemented as part of the SWPPP required for the project in order to reduce potential impacts on drainage patterns and flooding on- or off-~~-~~site. BMPs would be implemented to control construction site runoff and ensure proper stormwater control.

Impervious surfaces associated with the project during operation would include the parking areas, restroom facilities, administrative facility/ranger station, equestrian staging area, volunteer pad, basketball courts, pickleball courts, and ~~skate~~an all-wheel park and bike skills area. All other project components, including the corrals, community garden, natural turf areas, dog park, and nature play area would remain pervious. Operation of the project would include design features for drainage, including a bio-retention basin where necessary. Onsite storm runoff would be captured and treated on site using LID methods such as bio-retention, vegetated berms, and landscape and vegetated areas.

In the southern portion of the project site a vegetated berm would be elevated approximately 2 feet above the proposed parking area. Drainage patterns would be influenced by natural topography in the area. While there could be local changes in drainage patterns, overall, they would be similar to existing conditions. Therefore, the project would not substantially increase impervious surfaces at the project site in such a way that would substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-~~-~~site.

**iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff**

There are no existing or planned stormwater drainage systems proposed by the project, nor does the project require such systems. The project would involve approximately 341,570 square feet of new impervious surface areas. This amount would not contribute runoff water that would exceed the capacity of existing stormwater drainage systems. Due to the large amounts of natural and pervious surfaces on the project site, stormwater would generally percolate and recharge the groundwater table, similar to existing conditions.

The project would include ~~soccer and~~open fields, baseball fields, an all-wheel area, a bike skills area, recreational courts (i.e., basketball and pickleball), restroom facilities, an administrative facility/ ranger station~~/community room~~, an equestrian staging area and corral, a nature play area, a volunteer pad, a picnic area with a shade pavilion, picnic tables, and trails. The staging areas and parking areas could represent an additional source of polluted runoff from leaking oil or gasoline from vehicles; however, the project would include design features including bio-retention basins, for the control of drainage on the site, which allow for infiltration and reduce polluted stormwater runoff from being conveyed directly into receiving waters. The project would not include other sources of polluted runoff. Therefore, the project would not create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.

**iv. Impede or redirect flood flows**

As noted above, the project site is not located within a floodway; it is located within Zone X, defined as an area of minimal flood hazard (FEMA 2012). The project would not include grading or earthmoving that would impede or redirect water flow on site in the case of a flood. The project would involve an increase in impervious surfaces of approximately 341,570 square feet. However, the project would not place structures (i.e. restroom facilities, administrative facility/ranger station), trails, or other park components in areas that would impede or redirect flood flows. In addition, the project would be in compliance with the County's Flood Damage Prevention Ordinance and WPO. Therefore, the project would not impede or redirect flood flows.

### Impact Determination

Implementation of the project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in: (1) substantial erosion or siltation on- or off-site; (2) flooding on- or off-site; (3) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or (4) impede or redirect flood flows. Impacts would be less than significant.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

Impacts would be less than significant.

## Open Space~~/Preserve~~

### Impact Discussion

The proposed open space component of the project would occur in an existing undeveloped portion of the property. No new impervious surfaces would be created. Therefore, the project would not result in significantly increased erosion or sedimentation. As discussed above, the project site is not located within a floodway; it is located within Zone X. Construction activities within the open space~~/preserve~~ area would be limited to signage installation, restoration activities, and revegetation, which would not substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site; create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or impede or redirect flood flows.

Operational activities associated with the open space~~/preserve~~ component of the project would remain similar to existing uses in the area, which includes use of exiting trails for activities such as hiking, biking, and horseback riding. Operation of the open space~~/preserve~~ component would not substantially alter the existing drainage pattern of the site or area.

### Impact Determination

Construction and operation of the open space~~/preserve~~ component of the project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or through the addition of impervious surfaces in a manner which would result in substantial erosion or siltation on-or off-site; substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or ~~offsite~~off-site; create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or impede or redirect flood flows. Impacts would be less than significant.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

Impacts would be less than significant.

***Threshold 4: Implementation of the project would not, in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation.***

## County Park and Trails and Open Space~~/Preserve~~

### Impact Discussion

#### Construction and Operation

As discussed above, the project site is not located within a floodway or floodplain. The project site is located within Zone X (unshaded) an area of minimal flood hazard (FEMA 2012). The project site is not located within a designated tsunami hazard zone, and, therefore, visitors would not be subject to the risk of this hazard. Seiches are oscillations in an enclosed body of water caused by seismic shaking. The project is not located near a confined body of water on which a seiche could be expected to occur; therefore, visitors would not be subject to the risk of this hazard and would not risk release of pollutants due to project inundation.

### Impact Determination

The project would not be located in flood hazard, tsunami, or seiche zones and risk release of pollutants due to project inundation. Impacts would be less than significant.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

Impacts would be less than significant.

***Threshold 5: Implementation of the project <u>would not</u> conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.***

## County Park and Trails and Open Space~~/Preserve~~

### Impact Discussion

The County's JRMP and WPO are the countywide water quality management plans that would apply to the project. As discussed above, the project would be covered under the County's existing regional Waste Discharge Requirement Permit, which would require the project to implement site design measures and BMPs to reduce or prevent runoff pollution, that would be consistent with the County's JRMP and *BMP Design Manual.* BMPs would be implemented to control construction site runoff and to reduce the discharge of pollutants to receiving waters from stormwater and other nonpoint-source runoff. As part of compliance with permit requirements during ground-disturbing or construction activities, implementation of water quality control measures and BMPs would ensure that water quality standards would be achieved, including the water quality objectives that protect designated beneficial uses of surface and groundwater, as defined in the Basin Plan. Construction runoff would also have to comply with the appropriate water quality objectives for the region. The NPDES Construction General Permit also requires stormwater discharges not to contain pollutants that cause or contribute to an exceedance of any applicable water quality objectives or water quality standards, including designated beneficial uses. Incorporation of sustainable site design features such as surface landscaping design, vegetated buffers, and bioretention areas would also reduce stormwater runoff flows and associated pollutants.

The project site is not within a recognized DWR groundwater basin; therefore, there is no applicable sustainable groundwater management plan. However, the vegetated berm and bioretention areas throughout the project site would treat runoff and allow for groundwater infiltration and groundwater recharge. Further, the project would be in compliance with the County's groundwater ordinances.

### Impact Determination

Implementation of the project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. Impacts would be less than significant.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

Impacts would be less than significant.

# 4.10.5 Summary of Significant Impacts

There would be no impacts on hydrology and water quality.

Section 4.11
# Land Use and Planning

## 4.11.1 Overview

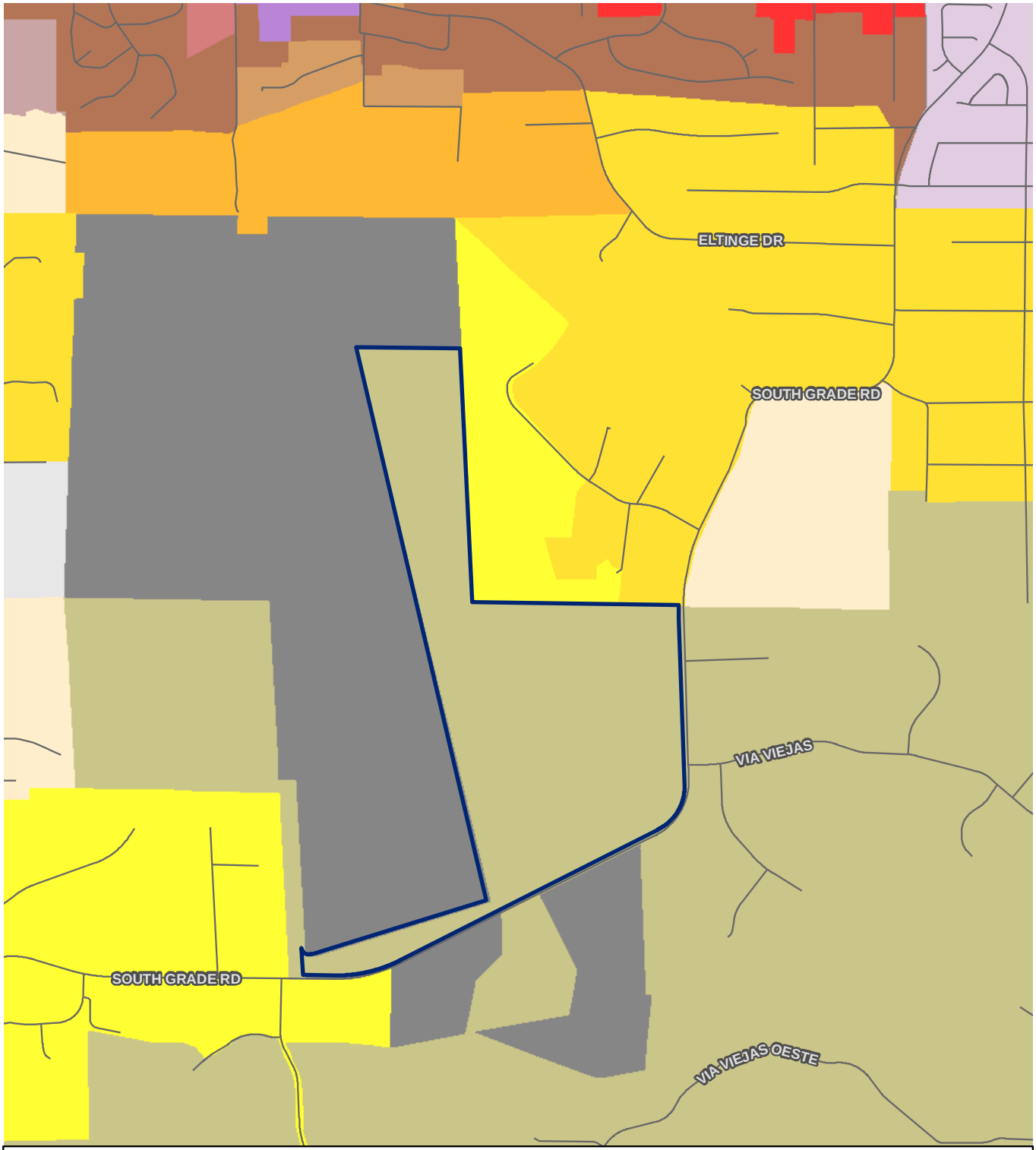
This section describes the existing land uses present in the project area and the applicable regulations governing land use, and analyzes the potential changes to land use that may result from implementation of the project.

## 4.11.2 Existing Conditions

The project site consists of approximately 96.6 acres of undeveloped land within the unincorporated community of Alpine in east San Diego County. The project site is located adjacent to the Backcountry Land Trust's (BCLT) Wright's Field Preserve, north of South Grade Road, east of Tavern Road, and south of Alpine Boulevard. Currently, the project site is surrounded by Wright's Field Preserve to the we~~a~~st, residential properties to the north, and South Grade Road and residential properties to the east and south.

The project site falls ~~under~~within the ~~jurisdiction~~boundary of the County of San Diego Alpine Community Plan (ACP). The ACP was originally adopted in 1979 and re-adopted in 2011 in conjunction with the County of San Diego General Plan Update. It was last amended on December 14, 2016. The project site is subject to a Semi-Rural Residential (SR-2) land use designation. Land uses surrounding the project site consist of Semi-Rural Residential (SR-1), Semi-Rural Residential (SR-2), Village Residential (VR-2.9), Village Residential (VR-2), and Open Space-Conservation (OS-C). Figure 4.11-1 shows the general plan land use designations of the project site and surrounding land uses.

Zoning for the site ~~itself~~ is A70, *Limited Agricultural Use*, and S80, *Open Space*. Figure 4.11-2 shows the zoning designations for the project site and surrounding areas.




\\PDCCITRDSGIS1\Projects_1\County_of_San_Diego\DPRIMSA_557775\TO33_Alpine_Park_HCP\Figures\Doc\EIR\Fig04_11_1_LU_Designations.mxd User: 19542 Date: 5/28/2021

0 500 1,000 Feet
1 in = 1,000 ft

**Figure 4.11-1**
**County Land Use Designations**

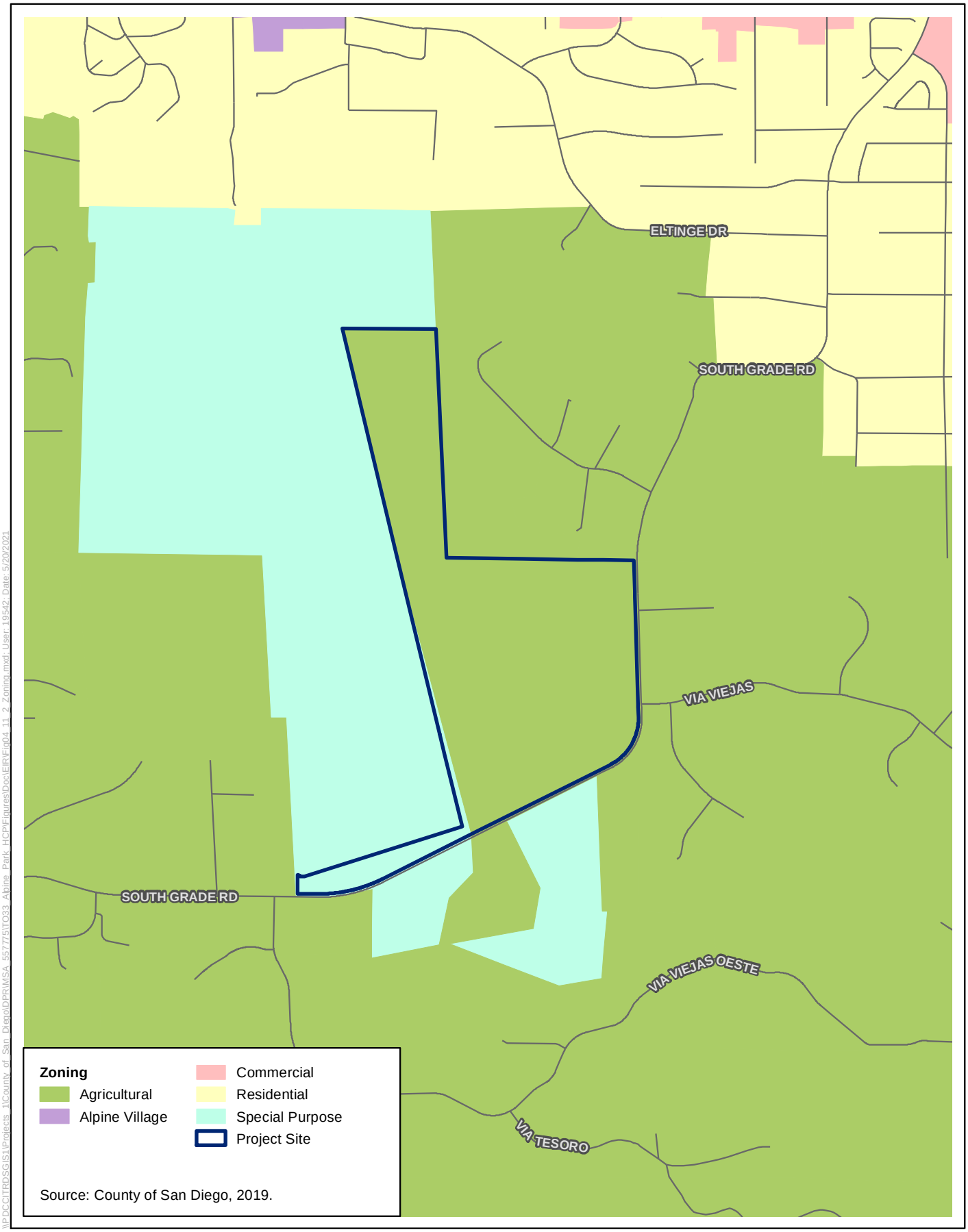



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**Figure 4.11-2**
**County Zoning**

# 4.11.3 Applicable Laws and Regulations

## 4.11.3.1 Federal

There are no applicable federal regulations regarding land use.

## 4.11.3.2 State

### State of California Density Bonus Law

California's Density Bonus Law (Government Code Section 65915 *et seq.*) is a mechanism to encourage developers to incorporate affordable units within a residential project in exchange for density bonuses and relief from other base development standards. Under the Density Bonus Law, developers are entitled to a density bonus corresponding to specified percentages of units set aside for very low-income, low-income, or moderate-income households.

### California Building Code

California Code of Regulations (CCR) Title 24 (CBC) applies to all applications for building permits. The CBC (also called the California Building Standards Code) has incorporated the International Building Code, which was first enacted by the International Conference of Building Officials in 1927 and has been updated approximately every 3 years since. The current version of the CBC (2019) became effective on January 1, 2020. CBC Title 24, Part 2, provides building codes and standards for the design and construction of structures in California. The CBC includes requirements for seismically resistant construction and foundations and soil investigations prior to construction. The CBC also establishes grading requirements that apply to excavation and fill activities and requires the implementation of erosion control measures.

### California Fire Code

The California Fire Code is a component of the CBC. Typical fire-safety requirements of the California Fire Code include the installation of sprinklers in all high-rise buildings, the establishment of fire resistance standards for fire doors, building materials, particular types of construction, and the clearance of debris and vegetation within a prescribed distance from occupied structures in wildfire hazard areas. The California Fire Code applies to all occupancies in California, except where more stringent standards have been adopted by local agencies.

## 4.11.3.3 Regional

### San Diego Association of Governments San Diego Forward: The Regional Plan

The San Diego Association of Governments (SANDAG) Board of Directors ~~San Diego~~ adopted *Forward: The Regional Plan* (Regional Plan) on October 9, 2015, to establish a long-range blueprint for the San Diego region's growth and development through the year 2050. The Regional Plan was developed in close partnership with the region's 18 cities and the County ~~government,~~ and aims to provide innovative mobility choices and planning to support a sustainable quality of life in a healthy region~~,~~ with a vibrant economy. The Regional Plan integrates both the 2004 Regional Comprehensive Plan and the 2050 Regional Transportation Plan (2050 RTP) and Sustainable

Communities Strategy (SCS) into one unified plan. By incorporating the SCS, the Regional Plan is in compliance with Senate Bill (SB) 375, which identifies how the region will address greenhouse gas (GHG) emissions to meet ~~s~~State-mandated levels and focuses on land use planning and transportation issues in an attempt to develop sustainable growth patterns on a regional level.

## 4.11.3.4 Local

### County of San Diego General Plan Update

The County of San Diego General Plan Update is the first comprehensive update of the General Plan since the 1970s. The General Plan Update, which applies to all unincorporated ~~portions of~~land within San Diego County, directs population growth and provides plans for infrastructure needs, development, and resource protection. The General Plan Update guides the growth and development of the unincorporated ~~San Diego County~~ area using innovative planning principles designed to create livable communities and balance environmental objectives with the needs of adequate infrastructure, housing, agriculture, and economic viability. The General Plan Update consists of ~~six~~seven elements: Land Use, Mobility, Housing, Conservation and Open Space, Safety, ~~and~~ Noise, and Environmental Justice. Goals and objectives from the Land Use and Conservation and Open Space elements are relevant to the project and are detailed below in Table 4.11-1, *Project Consistency with Relevant Goals, Policies, and Recommendations*.

### ~~1979~~ Alpine Community Plan

The ACP, amended on Dec 14, 2016, implements the Goals and Policies of the County General Plan for the Alpine area (County of San Diego 1979). The plan was prepared in accordance with Section 65101 of the Government Code, State of California and Board of Supervisors' Policy I-1. The ACP represents a specific guide for land use, conservation, and circulation; a guide for use by service delivery specialists; and recommendations to facilitate coordination of plans of other public agencies and the private sector. Policies and recommendations from the Community Character, Land Use, Noise, Public Facilities and Services, Safety, Conservation, Open Space, and Recreation elements are relevant to the project and are detailed in Table 4.11-1, *Project Consistency with Relevant Goals, Policies, and Recommendations*.

### Alpine Community Trails and Pathways Plan

The *Alpine Community Trails and Pathways Plan* is a component of the County's Community Trails Master Plan, which will be utilized to develop a system of interconnected regional and community trails and pathways (County of San Diego 2005). These trails and pathways are intended to address an established public need for recreation and transportation, but will also provide health and quality-of-life benefits associated with hiking, biking, and horseback riding throughout ~~the~~San Diego County's biologically diverse environments. The Alpine Community Trails and Pathways Plan identifies the South Grade Road Pathway (Trail #7) as a proposed pathway. This pathway would border the eastern and southern portions of the project site. The existing trails that traverse the project site are identified as existing Wrights Field Trails (Trail #14).

### County of San Diego Landscape Ordinance

On June 24, 2020, the Board of Supervisors adopted an amendment to the County's Landscaping Ordinance to codify Climate Action Plan Measure W-1.2, *Reduce Outdoor Water Use*, and A-2.1,

*Increase Residential Tree Planting*, requirements. Reducing outdoor water use and increasing tree planting reduces GHGs in the atmosphere, conserves natural resources, and improves water quality. The operative date of the Landscaping Ordinance amendment is July 24, 2020. The County Landscape Ordinance applies to projects in the unincorporated area ~~of the County~~ for which the County issues a building permit or a discretionary permit, including new construction where the aggregate landscaped area is 500 square feet or more.

### County of San Diego Water Efficient Landscape Design Manual

The County's *Water Efficient Landscape Design Manual* explains how people can comply with the County's Landscape Ordinance to create beautiful landscapes while using water efficiently and protecting people and properties from wildfires. The manual establishes a structure for planning, designing, installing, maintaining, and managing water-efficient landscapes in new construction and projects with modified landscapes. The manual also promotes the use of tertiary treated recycled water and graywater for irrigation, sets a maximum applied water allowance as an upper limit for water use, and encourages landscapes that create defensible space in the event of a wildfire.

# 4.11.4 Project Impact Analysis

## 4.11.4.1 Methodology

The project would implement the development of the approximately 25-acre Alpine Park and associated trails as well as the conservation of approximately 70 acres of ~~preserve~~open space land. The following section evaluates the impacts of the project with respect to land use. Based on the existing conditions, the analysis assesses the direct and indirect impacts related to land use using the thresholds presented below.

## 4.11.4.2 Thresholds of Significance

### Appendix G of the ~~State~~ CEQA Guidelines

Based on guidance provided in Appendix G of the ~~State~~ CEQA Guidelines, the project would result in a significant impact if it would:

1. Physically divide an established community.
2. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

### County of San Diego Guidelines for Determining Significance

The County ~~of San Diego~~ does not have specific guidelines for determining significance for land use impacts.

# 4.11.4.3 Project Impacts and Mitigation Measures

***Threshold 1: Implementation of the project would not physically divide an established community.***

## County Park ~~and~~, Trails~~;~~, and Open Space~~/Preserve~~

### Impact Discussion

The project would not result in the division of an established community because the project would be contained within existing parcel boundaries. Furthermore, the project would not include the construction of major new roadways or other infrastructure that could divide established communities. During construction, there may be temporary loss of access to portions of the project site. However, during operations, the project would maintain existing trails. Therefore, public access from South Grade Road to Wright's Field Preserve would be maintained, and the project would not physically divide an established community.

### Impact Determination

Impacts would be less than significant.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

Impacts would be less than significant.

***Threshold 2: Implementation of the project would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.***

## County Park ~~and~~, Trails~~;~~, and Open Space~~/Preserve~~

### Impact Discussion

The following analysis considers the project's consistency with the County of San Diego General Plan, the ACP, the Regional Plan, and the *Alpine Community Trails and Pathways Plan*.

The County concluded that the General Plan would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect (County of San Diego 2011). Applicable policies from County of San Diego General Plan and the ACP are listed below in Table 4.11-1, *Project Consistency with Relevant Goals, Policies, and Recommendations*.

Implementation of the County park and open space~~/preserve~~ area would be compatible with the project site's SR-2 land use designation. Zoning for the site is A70, *Limited Agricultural Use*, and S80,

*Open Space*. ~~The~~ County DPR's new and existing park facilities are exempt from the County's Zoning Ordinance (County of San Diego 2021). Therefore, the project would not conflict with existing zoning.

SANDAG's Regional Plan established a long-range blueprint for the San Diego region's growth and development through the year 2050. Because the project would not include any components that would result in substantial unplanned population growth, it would be consistent with the 2050 RTP. In addition, the project would have less-than-significant impacts on vehicle miles traveled (VMT), which would be consistent with the goals of SB 375 and SANDAG's Regional Plan.

The *Alpine Community Trails and Pathways Plan* identifies the South Grade Road Pathway (Trail #7) as a proposed pathway that would border the eastern and southern portions of the project site. The project would establish a pathway in this location. The existing trails that traverse the project site are identified in the plan as existing Wrights Field Trails (Trail #14). The project would maintain pedestrian access from South Grade Road to the Wright's Field Preserve and include the maintenance of approximately 1 mile of existing trails. To accomplish habitat-restoration activities, the project would involve trail closure activities along approximately 3,300 linear feet of existing informal-use trails. However, because access would be maintained across the project site, trail closures within the ~~preserve~~open space portion of the project site would still provide access to the existing trails in Wright's Field Preserve. Therefore, the project would be consistent with the *Alpine Community Trails and Pathways Plan*.

Please refer to Section 4.3, *Air Quality*, for a discussion of the project's consistency with the ~~with the~~ San Diego Regional Air Quality Strategy.

Please refer to Section 4.10, *Hydrology and Water Quality*, for a discussion of the project's consistency with the County's *Water Quality Control Plan for the San Diego Basin*.

## Impact Determination

Impacts would be less than significant.

## Mitigation Measures

No mitigation is required.

## Level of Significance After Mitigation

Impacts would be less than significant.

**Table 4.11-1. Project Consistency with Relevant Goals, Policies, and Recommendations.**

| Goals, Policies, and Recommendations | Project Consistency |
|---|---|
| **County of San Diego General Plan Update** | |
| **Land Use Element** | |
| **GOAL LU-2 Maintenance of the County's Rural Character**. Conservation and enhancement of the unincorporated County's varied communities, rural setting, and character. | **Consistent.** The project would implement the development of Alpine Park and associated trails, as well as the conservation of approximately 70 acres of open space~~/preserve~~. The project site currently has a land use designation of Semi-Rural Residential. The project would prevent the construction of residential structures on the project site and ensure the conservation of open space~~/preserve~~, thus maintaining the rural character of the area. |
| **OBJECTIVE LU-2.2 Relationship of Community Plans to the General Plan**. Community Plans are part of the General Plan. These plans focus on a particular region or community within the overall General Plan area. They are meant to refine the policies of the General Plan as they apply to a smaller geographic region and provide a forum for resolving local conflicts. As legally required by state law, Community Plans must be internally consistent with General Plan goals and policies of which they are a part. They cannot undermine the policies of the General Plan. Community Plans are subject to adoption, review and amendment by the Board of Supervisors in the same manner as the General Plan. | **Consistent.** The project would be consistent with the Alpine Community Plan, a component of the County of San Diego General Plan. |
| **OBJECTIVE LU-2.8 Mitigation of Development Impacts.** Require measures that minimize significant impacts to surrounding areas from uses or operations that cause excessive noise, vibrations, dust, odor, aesthetic impairment and/or are detrimental to human health and safety. | **Consistent.** As discussed throughout this Final EIR, mitigation measures will be implemented to minimize significant impacts resulting from the development of the project. |
| **GOAL LU-5 Climate Change and Land Use.** A land use plan and associated development techniques and patterns that reduce emissions of local greenhouse gases in accordance with state initiatives, while promoting public health. | **Consistent.** As discussed in Section 4.8, *Greenhouse Gases*, the project would not result in significant impacts related to greenhouse gas emissions. |
| **OBJECTIVE LU-5.2 Sustainable Planning and Design.** Incorporate into new development sustainable planning and design. | **Consistent.** The project would incorporate sustainable design features, including solar panels and drought-tolerant landscaping. |
| **OBJECTIVE LU-5.3 Rural Land Preservation.** Ensure the preservation of existing open space and rural areas (e.g., forested areas, agricultural lands, wildlife habitat and corridors, wetlands, watersheds, and groundwater recharge areas) when permitting development under the Rural and Semi Rural Land Use Designations. | **Consistent.** The project would preserve open space under a Semi-Rural land use designation. |

| Goals, Policies, and Recommendations | Project Consistency |
|---|---|
| **GOAL LU-6 Development—Environmental Balance.** A built environment in balance with the natural environment, scarce resources, natural hazards, and the unique local character of individual communities. | **Consistent.** The project would mitigate impacts on the natural environment and be designed to avoid impacts from natural hazards. |
| **OBJECTIVE LU-6.1 Environmental Sustainability.** Require the protection of intact or sensitive natural resources in support of the long-term sustainability of the natural environment. | **Consistent.** The project would preserve and protect sensitive natural resources~~, including Engelmann Oak trees~~. |
| **OBJECTIVE LU-6.3 Conservation-Oriented Project Design.** Support conservation-oriented project design. This can be achieved with mechanisms such as, but not limited to, Specific Plans, lot area averaging, and reductions in lot size with corresponding requirements for preserved open space (Planned Residential Developments). Projects that rely on lot size reductions should incorporate specific design techniques, perimeter lot sizes, or buffers, to achieve compatibility with community character. | **Consistent.** The project involves the conservation of approximately 70 acres of open space~~/preserve~~. |
| **OBJECTIVE LU-6.6 Integration of Natural Features into Project Design.** Require incorporation of natural features (including mature oaks, indigenous trees, and rock formations) into proposed development and require avoidance of sensitive environmental resources. | **Consistent.** The project would mitigate impacts on sensitive natural resources and would ~~not remove~~retain natural features, such as Engelmann Oak trees ~~from~~and rock formations, on the project site. |
| **OBJECTIVE LU-6.7 Open Space Network.** Require projects with open space to design contiguous open space areas that protect wildlife habitat and corridors; preserve scenic vistas and areas; and connect with existing or planned recreational opportunities. | **Consistent.** The project involves the conservation of approximately 70 acres of open space~~/preserve~~ located adjacent to Wright's Field Preserve. |
| **OBJECTIVE LU-6.8 Oversight of Open Space.** Require that open space associated with future development that is intended to be preserved in perpetuity either be:<br>1) Retained in private ownership of the property owner or a third party with a restrictive easement that limits use of the land as appropriate; or<br>2) Transferred into public ownership of an agency that manages preserved open space. The owner of the open space will be responsible for the maintenance and any necessary management unless those responsibilities are delegated through an adopted plan or agreement. Restrictive easements shall be dedicated to the County or a public agency (approved by the County) with responsibilities that correspond with the purpose of the open space. When transferred to a third party or public agency, a funding mechanism to support the future | **Consistent.** The project involves the conservation of approximately 70 acres of open space~~/preserve~~ that would be owned and managed by the County of San Diego. |

| Goals, Policies, and Recommendations | Project Consistency |
|---|---|
| maintenance and management of the property should be established to the satisfaction of the County. | |
| **OBJECTIVE LU-6.9 Development Conformance with Topography.** Require development to conform to the natural topography to limit grading; incorporate and not significantly alter the dominant physical characteristics of a site; and to utilize natural drainage and topography in conveying stormwater to the maximum extent practicable. | **Consistent.** The project would generally follow the existing topography as it slopes from north to south. Drainage patterns would be influenced by natural topography in the area. |
| **OBJECTIVE LU-6.10 Protection from Hazards.** Require that development be located and designed to protect property and residents from the risks of natural and man-induced hazards. | **Consistent.** As discussed in this Final EIR, the project would be located and designed to minimize risks from hazards. The project would also implement mitigation to reduce risks of natural and man-made hazards. |
| **GOAL LU-10 Function of Semi-Rural and Rural Lands.** Semi-Rural and Rural Lands that buffer communities, protect natural resources, foster agriculture, and accommodate unique rural communities. | **Consistent.** The project would preserve open space under a Semi-Rural land use designation. |
| **OBJECTIVE LU-10.2 Development—Environmental Resource Relationship.** Require development in Semi-Rural and Rural areas to respect and conserve the unique natural features and rural character, and avoid sensitive or intact environmental resources and hazard areas. | **Consistent.** The project would preserve open space under a Semi-Rural land use designation. As discussed throughout this Final EIR, the project would mitigate impacts on the natural environment and be designed to avoid impacts from natural hazards. |
| **Conservation and Open Space Element** | |
| **GOAL COS-2 Sustainability of the Natural Environment.** Sustainable ecosystems with long-term viability to maintain natural processes, sensitive lands, and sensitive as well as common species, coupled with sustainable growth and development. | **Consistent.** The project involves the conservation of approximately 70 acres of open space~~/preserve~~, thereby preserving sensitive lands and species. |
| **OBJECTIVE COS-2.1 Protection, Restoration and Enhancement.** Protect and enhance natural wildlife habitat outside of preserves as development occurs according to the underlying land use designation. Limit the degradation of regionally important natural habitats within the Semi-Rural and Rural Lands regional categories, as well as within Village lands, where appropriate. | **Consistent.** The project involves the conservation of approximately 70 acres of open space~~/preserve~~ under a Semi-Rural land use designation. In addition, the project will restore existing, informal trails ~~not identified~~. |
| **OBJECTIVE COS-2.2 Habitat Protection through Site Design.** Require development to be sited in the least biologically sensitive areas and minimize the loss of natural habitat through site design. | **Consistent.** The project would site the Alpine Park in the least environmentally sensitive portion of the project site and would preserve biologically sensitive areas and species ~~including Engelmann Oak trees.~~. |

| Goals, Policies, and Recommendations | Project Consistency |
|---|---|
| **GOAL COS-7 Protection and Preservation of Archaeological Resources.** Protection and preservation of the County's important archeological resources for their cultural importance to local communities, as well as their research and educational potential. | **Consistent.** As discussed in Section 4.5, *Cultural Resources*, the project would implement mitigation to reduce impacts on archaeological resources. |
| **OBJECTIVE COS-7.1 Archaeological Protection**. Preserve important archaeological resources from loss or destruction and require development to include appropriate mitigation to protect the quality and integrity of these resources. | **Consistent.** As discussed in Section 4.5, *Cultural Resources*, the project would implement mitigation to reduce impacts on archaeological resources. |
| **GOAL COS-9 Educational and Scientific Uses.** Paleontological resources and unique geologic features conserved for educational and/or scientific purposes. | **Consistent.** As discussed in Section 4.7, *Geology and Soils*, the project would implement mitigation to reduce impacts on paleontological resources. |
| **OBJECTIVE COS-9.1 Preservation.** Require the salvage and preservation of unique paleontological resources when exposed to the elements during excavation or grading activities or other development processes. | **Consistent.** As discussed in Section 4.7, *Geology and Soils*, the project would implement mitigation to reduce impacts on paleontological resources, which would include salvage and preservation, as appropriate. |
| **OBJECTIVE COS-9.2 Impacts of Development.** Require development to minimize impacts to unique geological features from human related destruction, damage, or loss. | **Consistent.** As discussed in Section 4.7, *Geology and Soils*, the project would implement mitigation to reduce impacts on unique geological features. |
| **GOAL COS-11 Preservation of Scenic Resources.** Preservation of scenic resources, including vistas of important natural and unique features, where visual impacts of development are minimized. | **Consistent.** As discussed in Section 4.1, *Aesthetics*, the project would not substantially damage scenic resources. The project would also preserve approximately 70 acres of open space~~/preserve~~. |
| **OBJECTIVE COS-11.3 Development Siting and Design.** Require development within visually sensitive areas to minimize visual impacts and to preserve unique or special visual features, particularly in rural areas, through the following:<br>• Creative site planning<br>• Integration of natural features into the project<br>• Appropriate scale, materials, and design to complement the surrounding natural landscape<br>• Minimal disturbance of topography<br>• Clustering of development so as to preserve a balance of open space vistas, natural features, and community character<br>• Creation of contiguous open space network | **Consistent.** The project would be sited and designed to minimize visual impacts. A landscaped berm would be located along the active park area to visually shield the park from South Grade Road. The clustering of active park features on the eastern portion of the project site allows for the preservation of open space and natural features. The remainder of the project site would remain undeveloped and would also contribute to an open-space network. Natural features, including Engelmann Oak trees, would be incorporated into the project design. |

| Goals, Policies, and Recommendations | Project Consistency |
|---|---|
| **GOAL COS-21 Park and Recreational Facilities**. Park and recreation facilities that enhance the quality of life and meet the diverse active and passive recreational needs of County residents and visitors, protect natural resources, and foster an awareness of local history, with approximately ten acres of local parks and 15 acres of regional parks provided for every 1,000 persons in the unincorporated County. | **Consistent.** The project would implement the development of Alpine Park and associated trails as well as the conservation of approximately 70 acres of open space~~/preserve~~. |
| ~~**OBJECTIVE COS-21.4 Regional Parks.** Require new regional parks to allow for a broad range of recreational activities, and preserve special or unique natural or cultural features when present.~~ | ~~**Consistent.** The project would provide a new park with a broad range of recreational activities, including potential multiuse turf areas, a baseball field, an all-wheel park, bike skills area, recreational courts (i.e., basketball, pickleball, and game table plaza), fitness stations, leash-free dog area, restroom facilities, an administrative facility/ranger station, equestrian staging and a corral, nature play area, community garden, a volunteer pad, picnic areas with shade structures, picnic tables, and multiuse trails. As discussed in Section 4.4, *Biological Resources*, and Section 4.5, *Cultural Resources*, unique natural or cultural features will be preserved, as feasible.~~ |
| **OBJECTIVE COS-21.5 Connections to Trails and Networks.** Connect public parks to trails and pathways and other pedestrian or bicycle networks, where feasible, to provide linkages and connectivity between recreational uses. | **Consistent.** The project would include the development and maintenance of trails that would connect to Alpine Park and trails in Wright's Field Preserve. |
| **GOAL COS-23 Recreational Opportunities in Preserves.** Acquisition, monitoring, and management of valuable natural and cultural resources where public recreational opportunities are compatible with the preservation of those resources. | **Consistent.** The project would implement recreational opportunities in Alpine Park, as well as preserve valuable natural resources as open space~~/preserve~~. |
| **OBJECTIVE COS-23.1 Public Access.** Provide public access to natural and cultural (where allowed) resources through effective planning that conserves the County's native wildlife, enhances and restores a continuous network of connected natural habitat, and protects water resources. | **Consistent.** The project would provide trails and connect to existing trails within Wright's Field Preserve, which is adjacent to the project site. The project site includes 70 acres that would be conserved to benefit native wildlife, natural habitat, and water resources. |
| **~~1979~~ Alpine Community Plan** | |
| **Chapter 1, Community Character** | |
| **Goal 1B:** Preserve and maintain the overall rural character of the semi-rural development area (one dwelling unit per acre to less than 20 acres per dwelling unit density) as a transition between village and the rural lands areas. | **Consistent.** The project involves the conservation of approximately 70 acres of open space~~/preserve~~ under a Semi-Rural land use designation. |

| Goals, Policies, and Recommendations | Project Consistency |
|---|---|
| **Policy/Recommendation 1:** Regulatory agencies shall ensure that future projects are consistent with the goals, policies and recommendations contained in the Alpine Community Plan. | **Consistent.** The project would be consistent with the Alpine Community Plan and would comply with all applicable regulatory requirements. |
| **Policy/Recommendation 4:** Site designs should:<br>a. Be in harmony with existing topography.<br>b. ~~g~~Grading shall not unduly disrupt the natural terrain, or cause problems associated with runoff, drainage, erosion, or siltation. Landscape disturbed by grading shall be revegetated.<br>c. Have grading plans that maximize retention of sensitive native vegetation, existing tree stands, and rock outcroppings, and natural topography. | **Consistent.** The project would generally follow the existing topography as it slopes from north to south. Drainage patterns would be influenced by natural topography in the area. |
| **Policy/Recommendation 6:** Require retention of mature trees in all public and private development projects, wherever possible. | **Consistent.** The project would retain sensitive Engelmann Oak trees within the project site. |
| **Chapter 2, Land Use** | |
| **General Goal 1:** Encourage a balance of land uses which will conserve natural and man-made resources, retain Alpine's rural character, and will accommodate people of diverse lifestyles, occupations, and interests. | **Consistent.** The project would implement the development of Alpine Park and associated trails as well as the conservation of approximately 70 acres of open space~~/preserve~~. The project site currently has a land use designation of Semi-Rural Residential. The project would prevent the construction of residential structures on the project site and ensure the conservation of open space~~/preserve~~, thus maintaining the rural character of the area. |
| **Chapter 6, Noise** | |
| **Policy/Recommendation 2:** Measures to mitigate any significant noise impacts on the community shall be considered with any discretionary land use decisions. | **Consistent.** As discussed in Section 4.13, *Noise,* the project would mitigate as necessary to reduce noise impacts. |
| **Chapter 7, Public Facilities and Services** | |
| **Policy/Recommendation 5:** Water conservation measures are strongly encouraged for both public and private developments. | **Consistent.** The project would implement water conservation measures such as low flow toilets and sinks, and drought-resistant landscaping. The project would also comply with the County of San Diego Water Efficient Landscape Design Manual, which establishes a structure for planning, designing, installing, maintaining, and managing water-efficient landscapes in new construction and projects with modified landscapes. |
| **Policy/Recommendation 7:** Public agencies shall consider the cumulative impacts of land use decisions on facilities and services on an on-going basis. | **Consistent.** Cumulative impacts have been discussed throughout this Final EIR. |

| Goals, Policies, and Recommendations | Project Consistency |
|---|---|
| **Policy/Recommendation 8:** Land use decisions shall be considered on the basis of their impacts on the quality and availability of services to the Alpine Area and the entire County. | **Consistent.** The project would provide additional recreation services through the implementation of a new park. |
| **Chapter 8, Safety** | |
| **Goal:** Promote the establishment of emergency procedures and preventative measures to minimize damage from fire, geologic hazards, crime occurrence, and hazardous substances. | **Consistent.** As discussed in Section 4.7, *Geology and Soils*, Section 4.9, *Hazards*, and Section 4.20, *Wildfire*, the project has implemented design features as necessary to minimize damage from fire, geologic hazards, crime occurrence, and hazardous substances. |
| **Policy/Recommendation 2:** Direct the appropriate County agency to require an acceptable level of fire protection for all approved development through appropriate discretionary permit processes. | **Consistent.** As discussed in Section 4.20, *Wildfire*, the project has evaluated fire hazards and implemented project design features as necessary to ensure fire protection. |
| **Policy/Recommendation 3:** Encourage development with fire preventive development practices and fire-resistant plant types. | **Consistent.** As discussed in Section 4.20, *Wildfire*, the project will incorporate fire preventive development practices and fire-resistant plant types. |
| **Policy/Recommendation 4:** Consider fire hazards in Alpine a serious and significant environmental impact during review of Environmental Impact Reports. | **Consistent.** This Final EIR evaluates wildfire hazards in Section 4.20, *Wildfire*. |
| **Policy/Recommendation 9:** Isolated seismic hazards should be identified during project-level analysis on discretionary projects. | **Consistent.** This Final EIR evaluates seismic hazards in Section 4.7, *Geology and Soils*. |
| **Policy/Recommendation 10:** Require a development project design to identify the existence of minor faults, deeply weathered slopes, and/or adverse rock fracturing conditions and to assess the potential for seismic hazards caused by such faults, weathering or fracturing. | **Consistent.** This Final EIR evaluates seismic hazards in Section 4.7, *Geology and Soils*. |
| **Chapter 9, Conservation** | |
| **Goal 1:** Promote the well-planned management of all valuable resources, natural and man-made, and prevent the destruction and wasteful exploitation of natural resources, where feasible. | **Consistent.** This Final EIR evaluates the natural resources present on the project site and includes mitigation measures to minimize impacts on natural resources. |
| **Policy/Recommendation 1:** Encourage the protection and conservation of unique resources in the Alpine Planning Area. | **Consistent.** The project involves the conservation of approximately 70 acres of open space~~/preserve~~. |
| **Policy/Recommendation 2:** Important plant, animal, mineral, water, cultural and aesthetic resources in the Alpine Plan area shall be protected through utilization of the Resource Conservation Area designations and appropriate land usage. | **Consistent.** The project site is located within a Resource Conservation Area as designated by the Alpine Community Plan. This Final EIR evaluates the natural resources present on the project site and includes mitigation measures to minimize impacts on natural resources. |

| Goals, Policies, and Recommendations | Project Consistency |
|---|---|
| **Policy/Recommendation 3:** Agencies regulating environmental reports and analyses required by CEQA may require supplemental studies for projects with land located in RCAs, if necessary. | **Consistent.** This Final EIR analyzes the project pursuant to CEQA and contains the appropriate supplemental studies. |
| **Policy/Recommendation 6:** Utilize all measures to preserve rare, threatened, or endangered plant life, including onsite protection through open space easement. Offsite propagation for reintroduction of suitable habitat to be coordinated by the Conservation Subcommittee. | **Consistent.** The project involves the conservation of approximately 70 acres of open space~~/preserve~~ to protect sensitive natural plant communities. The project would also retain sensitive Engelmann Oak trees within the project site. |
| **Policy/Recommendation 7:** Protect the rare Engleman Oak, wherever possible. | **Consistent.** The project would retain sensitive Engelmann Oak trees within the project site. |
| **Policy/Recommendation 13:** Encourage the continuation of support for the brush management program in conjunction with other public agencies to reduce wildfire hazard. | **Consistent.** As discussed in Section 4.20, *Wildfire*, the project will incorporate brush management to reduce wildfire hazards. |
| **Policy/Recommendation 14:** Protect surface and groundwater supplies from pollution. | **Consistent.** As discussed in Section 4.10, *Hydrology and Water Quality*, the project would implement features to reduce surface and groundwater pollution, including best management practices, a stormwater pollution prevention plan, low-impact development features, and stormwater retention basins. |
| **Policy/Recommendation 18:** Conserve water and biological resources of El Capitan Reservoir, Loveland Reservoir, and other water bodies and streams by utilization of Resource Conservation Area designations. Waste-water discharge into water shall be controlled. | **Consistent.** The project does not propose wastewater discharge into water. |
| **Policy/Recommendation 22:** Support strict controls over air pollutants. | **Consistent.** As discussed in Section 4.3, *Air Quality*, the project would implement mitigation measures to reduce impacts from air pollutants. |
| **Policy/Recommendation 23:** Support the regional air quality standards. | **Consistent.** As discussed in Section 4.3, *Air Quality*, the project would comply with regional air quality standards. |
| **Policy/Recommendation 25:** Support standards for strict controls over light pollution to preserve the dark night sky characteristics of Alpine. | **Consistent.** All permanent exterior ~~security~~ lighting associated with the project would be installed such that lamps and reflectors are not visible from beyond the project site, lighting does not cause excessive reflective glare, directed lighting does not illuminate the nighttime sky, illumination of the project facility and its immediate vicinity would be minimized, and the lighting plan complies with local policies and ordinances. |
| **Chapter 10, Open Space** | |
| **Goal:** Provide a system of open space that preserves the unique natural elements of the community, retains and extends areas in open space that are recognized as valuable for conservation of resources, open space uses that | **Consistent.** The project involves the conservation of approximately 70 acres of open space~~/preserve~~. |

| Goals, Policies, and Recommendations | Project Consistency |
|---|---|
| promote public health and safety, open space areas, along with areas which are inappropriate for urbanization or required as buffers for urban development, that harmonize with and help integrate conservation and recreation components, creating a well-balanced community of natural plant and animal habitat and humans alike. | |
| **Policy/Recommendation 1:** Encourage the development and preservation of a system of open space for wildlife corridors linking residential areas to permanent open space in the Cleveland National Forest and nearby lakes and wildlife preservation areas. | **Consistent.** The project involves the conservation of approximately 70 acres of open space~~/preserve~~ that would be adjacent to residential areas and connected to Wright's Field Preserve. |
| **Policy/Recommendation 3:** Incorporation of open space areas as integral parts of project site designs, preserving environmental resources, providing recreation for residents, and providing buffers to maintain neighborhood identities. | **Consistent.** The project would implement the development of Alpine Park and associated trails, as well as the conservation of approximately 70 acres of open space~~/preserve~~. |
| **Policy/Recommendation 5:** Incorporate publicly owned land into a functional recreation/open space system, wherever feasible. | **Consistent.** The project would implement recreational opportunities in Alpine Park, as well as preserve open space~~/preserve~~. |
| **Policy/Recommendation 11:** Enhance health and safety and conserve natural resources through the preservation of open space. | **Consistent.** The project would conserve natural resources as open space~~/preserve~~. |
| **Policy/Recommendation 12:** Provide recreational opportunities through the preservation of open space areas. | **Consistent.** The project would implement the development of Alpine Park and associated trails, as well as the conservation of approximately 70 acres of open space~~/preserve~~. |
| **Policy/Recommendation 13:** Preserve and encourage publicly and privately owned open space easements. | **Consistent.** The project involves the conservation of approximately 70 acres of open space~~/preserve~~ owned by the County of San Diego. |
| **Chapter 11, Recreation** | |
| **Goal 1:** A balanced system of both natural and improved parks with recreational facilities and services that incorporate outstanding natural features for recreational opportunities, enrich the lives of Alpine residents, and meet the needs of the community. | **Consistent.** The project would implement the development of Alpine Park and associated trails, as well as the conservation of approximately 70 acres of open space~~/preserve~~. The proposed park would support a broad range of recreational activities, including potential multiuse turf areas, a baseball field, an all-wheel park, bike skills area, recreational courts (i.e., <u>for</u> basketball, pickleball~~, game table plaza~~), fitness stations, leash-free dog area, restroom facilities, an administrative facility/ranger station, equestrian staging and a corral, nature play area, community garden, a volunteer pad, picnic areas with shade structures, picnic tables, <u>game table plaza,</u> and multiuse trails. |

| Goals, Policies, and Recommendations | Project Consistency |
|---|---|
| **Goal 2:** Recreational uses that are compatible and do not interfere with the safety and tranquility of private residences. | **Consistent.** Impacts on private residents on adjacent properties have been evaluated throughout this Final EIR, and mitigation measures have been applied, as necessary. |
| **Policy/Recommendation 9:** Encourage the acquisition and development of park lands that will protect outstanding scenic and riparian areas, cultural, historical, and biological resources. | **Consistent.** The project would develop park lands that would protect scenic, cultural, and biological resources. |

## 4.11.5 Summary of Significant Impacts

There would be no significant impacts related to land use.

Section 4.12
# Mineral Resources

## 4.12.1 Overview

This section describes the existing mineral resources present within the project site and the applicable regulations governing mineral resources and analyzes the potential changes to these resources that may result from implementation of the project.

## 4.12.2 Existing Conditions

The term *mineral resources* is used in the mining and conservation fields to describe a concentration or occurrence of natural, solid, inorganic, or fossilized organic material in or on the Earth's crust in such a form and quantity and of such a quality that it has reasonable prospects for economically viable extraction (County of San Diego 2011a). There are three general categories of important mineral resources ~~important to~~in San Diego County:

- **Construction materials:** sand, gravel, and crushed rock. This is economically the most important category of mineral resources.
- **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.
- **Metallic and rare minerals:** precious metals (gold, silver, platinum), iron and other ferro-alloy metals, copper, lead, zinc, gemstones and semi-precious materials, and optical-grade calcite.

No mineral deposits are located within the project site.

### Mineral Resource Zones

In 1975, the California Surface Mining and Reclamation Act (SMARA) required the classification of land into Mineral Resource Zones (MRZs) according to the land's known or inferred mineral resource potential. The primary goal of land classification was to provide local government decision-makers information regarding the mineral potential of land before they make land use decisions that may preclude mining.

The State Mining and Geology Board prioritizes areas to be classified and/or designated. The highest-priority areas are those within the ~~s~~State subject to urban expansion or other irreversible land uses that would preclude mineral extraction. In 1982, western San Diego County was classified into distinct MRZs according to the California Mineral Land Classification System. This area is referred to as the Western San Diego County Production-Consumption (P-C) Zone. The MRZs are described below. The project site is within an area that has been classified as MRZ-3.

### Mineral Resource Zone 1

MRZ-1 designates areas where adequate geologic information indicates no significant mineral deposits are present, or where it is judged there is little likelihood of their presence. This zone is applied by the California Geological Survey to lands where well-developed lines of reasoning, based on economic-geologic principles and adequate data, indicate that the likelihood for occurrence of significant mineral deposits is little to none. MRZ-1 is not present within the project site.

### Mineral Resource Zone 2

MRZ-2 designates areas underlain by mineral deposits where geologic data show that significant measured or indicated resources are present. A typical MRZ-2 area would include an operating mine, or an area where extensive sampling has indicated the presence of a significant mineral deposit. There are no MRZ-2 areas present within the project site.

### Mineral Resource Zone 3

MRZ-3 areas contain known mineral deposits that may qualify as mineral resources. Further exploration work within these areas could result in the reclassification of specific localities into the MRZ-2 category. Most of the rest of the land in the Western San Diego P-C Zone is MRZ-3, except for a few small areas that are MRZ-4. The project site is classified as MRZ-3.

### Mineral Resource Zone 4

MRZ-4 areas are those where geologic information does not rule out either the presence or absence of mineral resources. The distinction between the MRZ-1 and MRZ-4 categories is important for land use considerations. The MRZ-4 classification does not imply there is little likelihood for the presence of mineral resources but rather there is a lack of knowledge regarding mineral occurrence. Further exploration could result in the reclassification of MRZ-4 lands. There are no MRZ-4 areas within the project site.

### Uncategorized Zones

Uncategorized zones are all the lands outside the Western San Diego County P-C Zone. The project does not fall within land classified as ~~P-C~~Uncategorized Zone.

# 4.12.3 Applicable Laws and Regulations

## 4.12.3.1 Federal

There are no federal regulations, authorities, or administering agencies pertaining to mineral resources that would apply to the project.

## 4.12.3.2 State

### Surface Mining and Reclamation Act of 1975

Urban preemption of prime mineral deposits and conflicts between mining and other uses throughout California, as well as the need to adequately reclaim mining sites, led to the passage of

SMARA. The act establishes policies for conservation and development of mineral lands, and contains specific provisions for the classification of mineral lands by the State Geologist. SMARA requires all cities and counties to incorporate into their general plans the mapped designations approved by the lead agency for the operation of the surface mining operation. These designations are to include lands categorized as MRZs. MRZ classifications are set forth in the Guidelines for Classification and Designation of Mineral Lands developed by the State Mining and Geology Board and are used to communicate information concerning the existence of mineral resources.

## 4.12.3.3 Local

### San Diego County Zoning Ordinance, Sections 2820–2835, S82 Extractive Use Regulations

San Diego County Zoning Ordinance Sections 2820 et seq. are known as the S82 Extractive Use Regulations and are intended to identify and create areas within the ~~county~~unincorporated area where mining, quarrying, or oil-extractive uses are permitted. Typically, the S82 Extractive Use Regulations would be applied to areas of mineral deposits to signify the presence of such deposits and notify adjacent or affected properties of the intention to allow extraction of minerals within the zone. The regulations are used to preserve areas with valuable mineral deposits until extraction can take place.

### San Diego County Zoning Ordinance, Sections 6550–6556, Extractive Use Regulations

San Diego County Zoning Ordinance Sections 6550 et seq. are known as the Extractive Use Regulations and provide the means for public review and regulation of mineral extraction and associated onsite processing operations.

### County of San Diego Code of Regulatory Ordinances Section 87.701–87.714, Surface Mining

In 2003, the Board of Supervisors added Sections 87.701 through 87.714, titled *Surface Mining*, to the County of San Diego Code of Regulatory Ordinances to regulate all surface mining operations in the unincorporated area ~~of the county~~ as authorized by the San Diego County Zoning Ordinance and SMARA to ensure that:

a. The continued mining of minerals will be permitted in a manner that will protect the public health and safety and will provide for the protection and subsequent beneficial use of mined and reclaimed land.

b. The possible adverse effects of surface mining operations on the environment, including air pollution, impedance of groundwater movement, water quality degradation, damage to aquatic or wildlife habitat, flooding, erosion, and sedimentation, will be prevented or minimized.

c. The production and conservation of minerals will be encouraged while giving consideration to values relating to recreation, watershed, wildlife, range and forage, and aesthetic enjoyment.

This ordinance is intended to implement the minimum requirements of SMARA as well as to specify local requirements (County of San Diego 2008). County Code Sections 87.701 through 87.714 require that no person conduct surface mining unless a Major Use Permit is obtained, a Reclamation

Plan is approved as provided by the Zoning Ordinance and SMARA, and financial assurances for reclamation have been approved by the County. Grading performed pursuant to a Major Use Permit or Reclamation Plan must be in accordance with a plot plan and conditions approved therewith.

### County of San Diego General Plan ~~Update~~ Policies

The following general plan ~~update~~ policies are applicable to mineral resources.

#### Conservation and Open Space Element

**Policy COS-10.1: Siting of Development.** Encourage the conservation (i.e., protection from incompatible land uses) of areas designated as having substantial potential for mineral extraction. Discourage development that would substantially preclude the future development of mining facilities in these areas. Design development or uses to minimize the potential conflict with existing or potential future mining facilities. For purposes of this policy, incompatible land uses are defined by SMARA Section 3675.

**Policy COS-10.2: Protection of State-Classified or Designated Lands.** Discourage development or the establishment of other incompatible land uses on or adjacent to areas classified or designated by the State of California as having important mineral resources (MRZ-2), as well as potential mineral lands identified by other government agencies. The potential for the extraction of substantial mineral resources from lands classified by the State of California as areas that contain mineral resources (MRZ-3) shall be considered by the County in making land use decisions.

**Policy COS-10.3: Road Access.** Prohibit development from restricting road access to existing mining facilities, areas classified MRZ-2 or MRZ-3 by the State Geologist, or areas identified in the County Zoning Ordinance for potential extractive use in accordance with SMARA section 2764.a.

**Policy COS-10.4: Compatible Land Uses.** Discourage the development of land uses that are not compatible with the retention of mining or recreational access to non-aggregate mineral deposits. See Policy COS-10.1 for a definition of incompatible land uses.

**Policy COS-10.6: Conservation of Construction Aggregate.** Encourage the continued operation of existing mining facilities and streamline the permitting of new mining facilities consistent with the goal to establish permitted aggregate resources that are sufficient to satisfy 50 years of County demand.

**Policy COS-10.8: New Mining Facilities.** Develop specific permit types and procedures for the authorization of new mining facilities that recognize the inherent physical effects of mining operations and the public necessity for available mineral resources adequate to meet local demand, in accordance with PRC Section 2762.

**Policy COS-10.9: Overlay Zones.** Provide zoning overlays for MRZ-2 designated lands and a 1,300-foot-wide buffer area adjacent to such lands. Within these overlay zones, the potential effects of proposed land use actions on potential future extraction of mineral resources shall be considered by the decision-makers.

# 4.12.4 Project Impact Analysis

## 4.12.4.1 Methodology

The project would implement the development of Alpine Park and associated trails as well as the conservation of approximately 70 acres of open space~~/preserve~~. Section 4.12.4.3 evaluates the effects on existing mineral resources (as described above) should the project be implemented. Based

on the existing conditions, the analysis assesses the direct and indirect impacts related to mineral resources using the thresholds presented below.

## 4.12.4.2 Thresholds of Significance

### Appendix G of the ~~State~~ CEQA Guidelines

Based on guidance provided in Appendix G of the~~ State~~ CEQA Guidelines, the project would result in a significant impact if it would:

1. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the ~~s~~State.
2. 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.

### County of San Diego Guidelines for Determining Significance

Based on the *County Guidelines for Determining Significance, Mineral Resources* (County of San Diego 2008), implementation of the project would have a significant impact if it would result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the ~~s~~State, such as proposing incompatible development:

- On or in the vicinity of (generally up to 1,300 feet from the site) an area classified as MRZ-2
- On land classified as MRZ-3
- On land underlain by Quaternary alluvium
- On or in the vicinity of areas containing industrial material and gemstone resources

## 4.12.4.3 Project Impacts and Mitigation Measures

***Threshold 1: Implementation of the project would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the ~~s~~State.***

### County Park and Trails and Open Space~~/Preserve~~

#### Impact Discussion

The project site is on lands classified as MRZ-3 and does not have mineral deposits or active mines present. The project site is surrounded by developed land uses including rural residential, which is incompatible with future extraction of mineral resources on the project site (County of San Diego 2011b). The project site is zoned as A70, *Limited* ~~Agriculture~~*Agricultural Use*, and mining is not a permitted use in this zone.

The development of the project would not result in the loss of availability of a known mineral resource that would be of value because current land uses and zoning preclude mining on the project site.

### Impact Determination

Implementation of the project would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the ~~s~~State. Impacts would be less than significant.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

Impacts would be less than significant.

***Threshold 2: Implementation of the project would not 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.***

## County Park, Trails, and Open Space~~/Preserve~~

### Impact Discussion

As described above, the project site is in an area designated MRZ-3. However, the project would not result in the loss of locally important mineral resources because the project site is within the Alpine Park, for which proposed goals are incompatible with future extraction of mineral resources. The project site is not ~~considered to be~~within an Extractive Use Zone (S82) and does not have an Impact Sensitive Land Use Designation (24) with an Extractive Land Use Overlay (25) (County of San Diego 2011a). The placement of the proposed use on the project site would not result in a loss of mineral resources because future mining at the site is already precluded by existing land use incompatibilities.

Therefore, no loss of availability of a locally important mineral resource recovery (extraction) site delineated on a local general plan, specific plan, or other land use plan would result from project implementation.

### Impact Determination

Implementation of the project would not 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. Impacts would be less than significant.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

Impacts would be less than significant.

## 4.12.5 Summary of Significant Impacts

There would be no significant impacts associated with mineral resources.

Section 4.13
# Noise and Vibration

## 4.13.1 Overview

This section describes the geographic and regulatory setting for noise, discusses noise impacts that would result from construction and operations of the proposed Alpine Park, determines the significance of impacts (where applicable), and identifies mitigation measures that would reduce or avoid significant impacts, where feasible.

~~As described in Chapter 3, *Project Description,* the study area would include the development of an approximately 25-acre active park and 1 mile of trails within 96.6 acres of undeveloped land in the unincorporated community of Alpine. The portion of the project site not developed by the active park would remain as open space/preserve.~~

The analysis in this section includes impact determinations under CEQA for the proposed Alpine Park based on the applicable County thresholds. Where impacts have been identified, mitigation measures have been identified to reduce impact to less than significant (where applicable). Mitigation measures will be included as part of the project.

## 4.13.2 Noise and Vibration Fundamentals

### 4.13.2.1 Environmental Noise

Noise is commonly defined as unwanted sound. Sound can be described as the mechanical energy of a vibrating object transmitted by pressure waves through a liquid or gaseous medium (e.g., air) to a hearing organ, such as a human ear. Noise is often defined as sound that is objectionable because it is disturbing or annoying.

In the science of acoustics, the fundamental model consists of a sound (or noise) source, a receptor, and the propagation path between the two. The loudness of the noise source and the obstructions or atmospheric factors, which affect the propagation path to the receptor, determine the sound level and the characteristics of the noise perceived by the receptor.

#### Decibels and Frequency

Continuous sound can be described by *frequency* (pitch) and *amplitude* (loudness). A low-frequency sound is perceived as low in pitch. Frequency is expressed in terms of cycles per second, or Hertz (Hz) (e.g., a frequency of 250 cycles per second is referred to as 250 Hz). High frequencies are sometimes more conveniently expressed in kilohertz, or thousands of Hz. The audible frequency range for humans is generally between 20 Hz and 20,000 Hz.

The amplitude of pressure waves generated by a sound source determines the loudness of that source. The amplitude of a sound is typically described in terms of *sound pressure level*, which refers to the root-mean-square pressure of a sound wave and can be measured in units called microPascals (µPa). One µPa is approximately ~~one~~ one hundred-billionth (0.00000000001) of normal

atmospheric pressure. Sound pressure levels for different kinds of noise environments can range from less than 100 to over 100,000,000 µPa. Because of this large range of values, sound is rarely expressed in terms of µPa. Instead, a logarithmic scale is used to describe the sound pressure level (also referred to simply as the sound level~~), expressed)~~ in terms of decibels~~ and,~~ abbreviated ~~as "~~dB~~.".~~ Specifically, the decibel describes the ratio of the actual sound pressure to a reference pressure and is calculated as follows:

$$SPL = 20 \times \log_{10}\left(\frac{X}{20\,\mu Pa}\right)$$

where X is the actual sound pressure and 20 µPa is the standard reference pressure level for acoustical measurements in air. The threshold of hearing for young people is about 0 dB, which corresponds to 20 µPa.

## Decibel Addition

Because decibels are logarithmic, sound pressure levels cannot be added or subtracted through ordinary arithmetic. On the dB scale, a doubling of sound energy corresponds to a 3 dB increase. In other words, when two identical sources are each producing sound of the same loudness, their combined sound level at a given distance would be 3 dB higher than one source under the same conditions. For example, if one~~ soil~~ excavator produces a sound pressure level of 80 dB, two excavators would not produce 160 dB. Rather, they would combine to produce 83 dB. The cumulative sound level of any number of sources can be determined using decibel addition. The same decibel addition is used for A-weighted decibels described below.

## Perception of Noise and A-Weighting

The dB scale alone does not adequately characterize how humans perceive noise. The dominant frequencies of a sound have a substantial effect on the human response to that sound. Although the intensity (energy per unit area) of the sound is a purely physical quantity, the loudness or human response is determined by characteristics of the human ear.

Human hearing is limited in the range of audible frequencies as well as in the way it perceives the sound pressure level in that range. In general, people are most sensitive to the frequency range of 1,000 to 8,000 Hz and perceive sounds within that range better than sounds of the same amplitude at higher or lower frequencies. To approximate the response of the human ear, sound levels in various frequency bands are adjusted (or "weighted"), depending on human sensitivity to those frequencies. The resulting sound pressure level is expressed in A-weighted decibels, abbreviated dBA. When people make judgments regarding the relative loudness or annoyance of a sound, their judgments correlate well with the A-weighted sound levels of those sounds. Table 4.13-1 describes typical A-weighted sound levels for various noise sources.

## Human Response to Noise

Noise-sensitive receptors (also called "receivers") are locations where people reside or where the presence of unwanted sound may adversely affect the use of the land~~ (e.g, a library) .~~. The effects of noise on people can be listed in three general categories~~.~~:

- Subjective effects of annoyance, nuisance, or dissatisfaction,

- Interference with activities such as speech, sleep, learning, or working, and
- Physiological effects such as startling and hearing loss.

In most cases, effects from sounds typically found in the natural environment (compared to an industrial or an occupational setting) would be limited to the first two categories: creating an annoyance or interfering with activities. (Further discussion of health-related effects is provided below.) No completely satisfactory method exists to measure the subjective effects of sound or the corresponding reactions of annoyance and dissatisfaction. This lack of a common standard arises primarily from the wide variation in individual thresholds of annoyance and habituation to sound. Therefore, an important way of determining a person's subjective reaction to a new sound is by comparing it to the existing baseline or "ambient" environment to which that person has adapted. In general, the more the level or tonal (frequency) variations of a sound exceed the previously existing ambient sound level or tonal quality, the less acceptable the new sound will be, as judged by the exposed individual.

Studies have shown that under controlled conditions in an acoustics laboratory, a healthy human ear is able to discern changes in sound levels of 1 dBA. In the normal environment, the healthy human ear can detect changes of about 2 dBA; however, it is widely accepted that a doubling of sound energy, which results in a change of 3 dBA in the normal environment, is considered just noticeable to most people. A change of 5 dBA is readily perceptible, and a change of 10 dBA is perceived as being twice as loud. Accordingly, a doubling of sound energy (e.g., doubling the volume of traffic on a highway) resulting in a 3 dBA increase in sound would generally be barely detectable.

**Table 4.13-1. Typical Noise Levels in the Environment**

| Common Outdoor Noise Source | Sound Level (dBA) | Common Indoor Noise Source |
|---|---|---|
| | — 110 — | Rock band |
| Jet flying at 1,000 feet | | |
| | — 100 — | |
| Gas lawn mower at 3 feet | | |
| | — 90 — | |
| Diesel truck at 50 feet at 50 mph | | Food blender at 3 feet |
| | — 80 — | Garbage disposal at 3 feet |
| Noisy urban area, daytime | | |
| Gas lawn mower at 100 feet | — 70 — | Vacuum cleaner at 10 feet |
| Commercial area | | Normal speech at 3 feet |
| Heavy traffic at 300 feet | — 60 — | |
| | | Large business office |
| Quiet urban daytime | — 50 — | Dishwasher in next room |
| Quiet urban nighttime | — 40 — | Theater, large conference room (background) |
| Quiet suburban nighttime | | |
| | — 30 — | Library |
| Quiet rural nighttime | | Bedroom at night |
| | — 20 — | |
| | | Broadcast/recording studio |
| | — 10 — | |

| Common Outdoor Noise Source | Sound Level (dBA) | Common Indoor Noise Source |
|---|---|---|
| Lowest threshold of human hearing | — 0 — | Lowest threshold of human hearing |

Source: California Department of Transportation 2013.

## Noise Descriptors

Because sound levels can vary markedly over a short period of time, various descriptors or noise "metrics" have been developed to quantify environmental and community noise. These metrics generally describe either the average character of the noise or the statistical behavior of the variations in the noise level. The most common of these metrics are described below.

**Equivalent Sound Level ($L_{eq}$)** is the most common metric used to describe short-term average noise levels. Many noise sources produce levels that fluctuate over time; examples include mechanical equipment that cycles on and off or construction work, which can vary sporadically. The $L_{eq}$ describes the average acoustical energy content of noise for an identified period of time, commonly 1 hour. Thus, the $L_{eq}$ of a time-varying noise and that of a steady noise are the same if they deliver the same acoustical energy over the duration of the exposure. For many noise sources, the $L_{eq}$ will vary, depending on the time of day. A prime example is traffic noise, which rises and falls, depending on the amount of traffic on a given street or freeway.

**Maximum Sound Level ($L_{max}$)** and **Minimum Sound Level ($L_{min}$)** refer to the maximum and minimum sound levels, respectively, that occur during the noise measurement period. More specifically, they describe the root-mean-square sound levels that correspond to the loudest and quietest 1-second intervals that occur during the measurement.

**Percentile-Exceeded Sound Level ($L_{xx}$)** describes the sound level exceeded for a given percentage of a specified period (e.g., $L_{10}$ is the sound level exceeded 10% of the time, and $L_{90}$ is the sound level exceeded 90% of the time)

**Community Noise Equivalent Level (CNEL)** is a measure of the cumulative 24-hour noise level that considers not only the variation of the A-weighted noise level but also the duration and the time of day of the disturbance. The CNEL is derived from the 24 A-weighted 1-hour $L_{eq}$s that occur in a day, with "penalties" applied to the level occurring during the evening hours (7 p.m. to 10 p.m.) and nighttime hours (10 p.m. to 7 a.m.) to account for increased noise sensitivity during these hours. Specifically, the CNEL is calculated by adding 5 dBA to the evening $L_{eq}$, adding 10 dBA to the nighttime $L_{eq}$, and then taking the average value for all 24 hours.

**Day-Night Average Sound Level ($L_{dn}$)** is a measure of the cumulative 24-hour noise that is very similar to CNEL (described above); the only difference is that $L_{dn}$ does not apply a "penalty" to evening noise levels. The $L_{dn}$ is derived from the 24 A-weighted 1-hour $L_{eq}$s that occur in a day. A 5 dBA "penalty" is added to the levels occurring during the nighttime hours (10 p.m. to 7 a.m.) and then the average is calculated for all 24 hours.

## Sound Propagation

When sound propagates over a distance, it changes in both level and frequency content. The manner in which noise is reduced with distance depends on the following important factors.

**Geometric Spreading**. Sound from a single source (i.e., a *point source*) radiates uniformly outward as it travels away from the source in a spherical pattern. The sound level attenuates (or drops off) at

a rate of 6 dBA for each doubling of distance. Highway noise is not a single stationary point source of sound. The movement of vehicles on a highway makes the source of the sound appear to emanate from a line (i.e., a *line source*) rather than from a point. This results in cylindrical spreading rather than the spherical spreading resulting from a point source. The change in sound level (i.e., attenuation) from a line source is 3 dBA per doubling of distance.

**Ground Absorption**. Usually the noise path between the source and the observer is very close to the ground. The excess noise attenuation from ground absorption occurs due to acoustic energy losses on sound wave reflection. Traditionally, the excess attenuation has also been expressed in terms of attenuation per doubling of distance. This approximation is done for simplification only; for distances of less than 200 feet, prediction results based on this scheme are sufficiently accurate. For acoustically "hard" sites (i.e., sites with a reflective surface, such as a parking lot or a smooth body of water, between the source and the receptor), no excess ground attenuation is assumed because the sound wave is reflected without energy losses. For acoustically absorptive or "soft" sites (i.e., sites with an absorptive ground surface, such as soft dirt, grass, or scattered bushes and trees), an excess ground attenuation value of 1.5 dBA per doubling of distance is normally assumed. When added to the geometric spreading, the excess ground attenuation results in an overall drop-off rate of 4.5 dBA per doubling of distance for a line source and 7.5 dBA per doubling of distance for a point source.

**Atmospheric Effects**. Research by the California Department of Transportation (Caltrans) (2013) and others has shown that atmospheric conditions can have a major effect on noise levels. Wind has been shown to be the single most important meteorological factor within approximately 500 feet, whereas vertical air temperature gradients are more important over longer distances. Other factors, such as air temperature, humidity, and turbulence, also have major effects. Receptors located downwind from a source can be exposed to increased noise levels relative to calm conditions, whereas locations upwind can have lower noise levels. Increased sound levels can also occur because of temperature inversion conditions (i.e., increasing temperature with elevation, with cooler air near the surface, where the sound source tends to be, and the warmer air above that acts as a cap, causing a reflection of ground level–generated sound).

**Shielding by Natural or Human-Made Features**. A large object or barrier in the path between a noise source and a receptor can substantially attenuate noise levels at the receptor. The amount of attenuation provided by this shielding depends on the size of the object, proximity to the noise source and receptor, surface weight, solidity, and the frequency content of the noise source. Natural terrain features (such as hills and dense woods) and human-made features (such as buildings and walls) can substantially reduce noise levels. Walls are often constructed between a source and a receptor with the specific purpose of reducing noise. A barrier that breaks the line of sight between a source and a receptor will typically result in at least 5 dB of noise reduction. A higher barrier may provide as much as 20 dB of noise reduction.

### 4.13.2.2 Environmental Vibration

Ground-borne vibration is an oscillatory motion of the soil with respect to the equilibrium position and can be quantified in terms of *velocity* or *acceleration*. The velocity describes the instantaneous speed of the motion and acceleration is the instantaneous rate of change of the speed. Each of these measures can be further described in terms of *frequency* and *amplitude*.

In contrast to airborne sound, ground-borne vibration is not a phenomenon that most people experience every day. The background vibration velocity level in residential areas is usually much

lower than the threshold of human perception. Most perceptible indoor vibration is caused by sources within buildings, such as mechanical equipment while in operation, people moving, or doors slamming. Typical outdoor sources of perceptible ground-borne vibration are heavy construction equipment (such as blasting and pile driving), railroad operations, and heavy trucks on rough roads. If a roadway is smooth, the ground-borne vibration from traffic is rarely perceptible. Ground-borne vibration can be a serious concern for neighbors of nearby sources, causing buildings to shake and rumbling sounds to be heard. If a person is engaged in any type of physical activity, vibration tolerance increases considerably. Vibration can result in effects that range from annoyance to structural damage. Variations in geology and distance result in different vibration levels with different frequencies and amplitudes.

### Vibration Descriptors

Various descriptors, or "metrics," can be used to quantify ground-borne vibration. The metrics used in the assessment of environmental impacts are generally focused on the short-term maximum vibration levels. The two metrics considered in this study are described below.

**Peak particle velocity (PPV)** is defined as the maximum instantaneous positive or negative peak amplitude of the vibration velocity. The unit of measurement for PPV is inches per second (in/s).

**Vibration velocity level ($L_v$)** describes the root-mean-square (rms) velocity amplitude of the vibration. This rms value may be thought of as a "smoothed" or "magnitude-averaged" amplitude. The maximum $L_v$ describes the maximum rms velocity amplitude that occurs over a 1-second period during a vibration measurement (in this way, $L_v$ is analogous to the $L_{max}$ metric used to describe maximum noise levels). $L_v$ can be measured in in/s but is typically expressed on a logarithmic scale using decibels. To avoid confusion with decibels used to describe sound levels, the abbreviation "VdB" is used to denote vibration velocity level decibels. Specifically, a vibration velocity level ($L_v$), in decibels (VdB), is calculated as follows:

$$L_V = 20 \log_{10}\left(\frac{V}{1\times10^{-6}\, in./s}\right),$$

where *V* is the actual 1-second rms velocity amplitude and $1\times10^{-6}$ in/s is the standard reference velocity amplitude.

## 4.13.3 Existing Conditions

The existing noise-sensitive receivers in the vicinity of the project consist of low-density single-family residential uses and undeveloped land uses surrounding the project site. Residential properties to the north are immediately adjacent to the project site and to the east and south are separated by South Grade Road. Single-family residences to the west are separated from the project site by undeveloped land.

The existing noise environment in the project vicinity is generally quiet. The primary sources of noise are traffic on South Grade Road. Other noise sources in the project are birds and landscaping activity.

In order to document existing noise levels in the study area, three short-term (ST) measurements and two long-term (LT) measurements were obtained in the project vicinity (see Figure 4.13-1~~)~~)

between Friday, March 27, and Tuesday, March 31, 2020.[1] These locations were selected to document the existing noise levels at the closest noise-sensitive receptors to the north, east, south, and west. Each short-term measurement was conducted over a period of at least 15 to 30 minutes. The long-term measurements were conducted over a period of approximately 96 hours.

The instrumentation used to obtain the noise measurements consisted of a Type 1 Larson Davis (Model Lxt) integrating sound level meter (SLM) for short-term noise measurements, two Type 2 Picc~~i~~olo II integrating SLMs for long-term noise measurements, and a Larson Davis (Model CAL200) acoustical calibrator used to field-calibrate all SLMs before and after each measurement for accuracy. The instruments are maintained to manufacturer specifications to ensure accuracy, in accordance with American National Standards Institute (ANSI) standard S1.4-2006. For all measurements, the SLM microphone was mounted at a height of 5 feet above the ground.

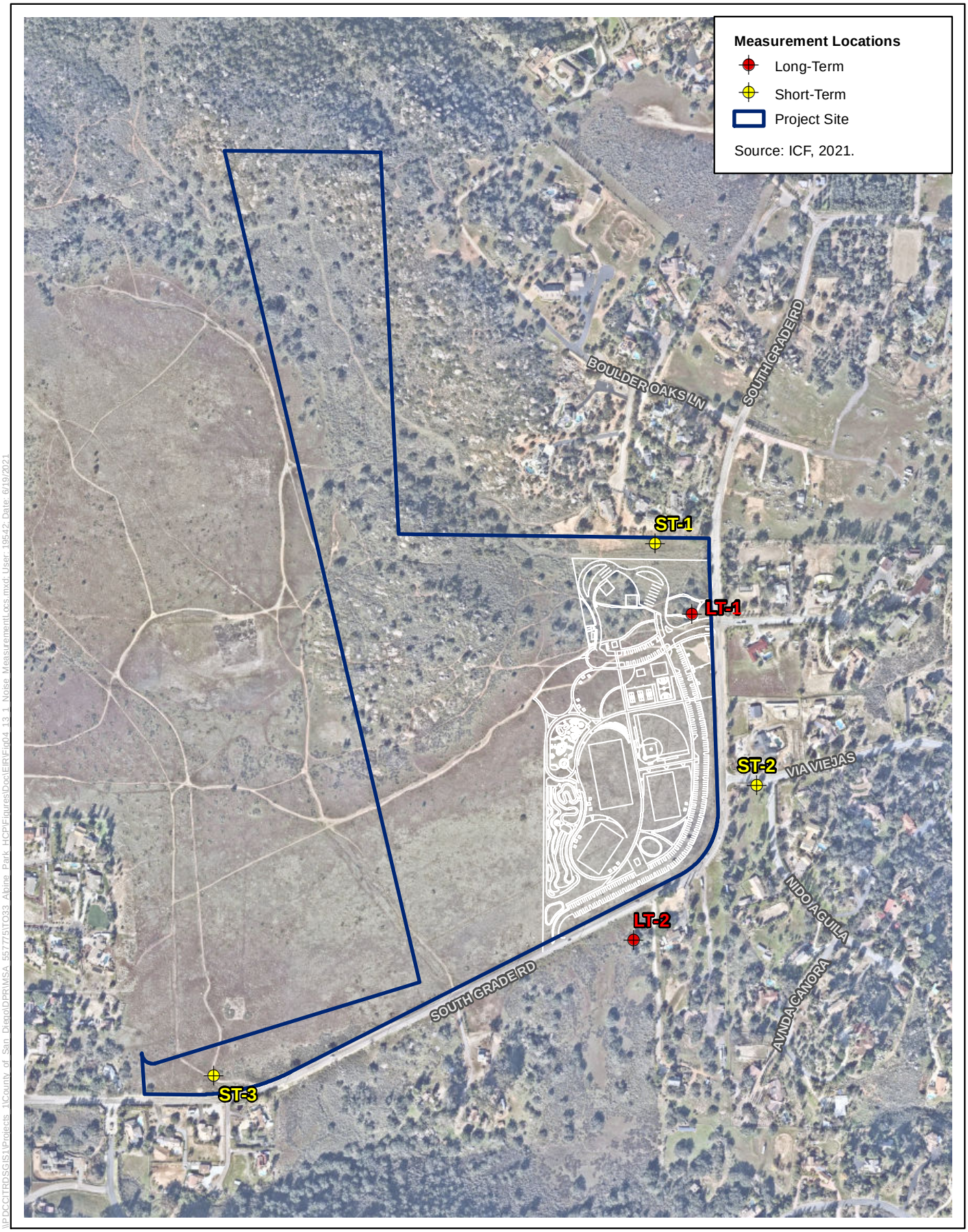
Short-term noise measurements (ST1 through ST3) indicate that the ambient measured noise levels were generally in the range of 46 to 51 dBA $L_{eq}$ at land uses surrounding the project site. Long-term noise measurements indicated that daytime ambient noise levels (7:00 a.m. to 10:00 p.m.) range from 49 to 64 dBA $L_{eq}$ and 52 to 65 dBA $L_{eq}$ at measurement sites LT1 and LT2. Nighttime ambient noise levels were generally in the range of 33 to 56 dBA $L_{eq}$ and 39 to 57 dBA $L_{eq}$ at land uses surrounding the project site (LT1 and LT2). Additional details and a summary of the measurement results are provided in Table 4.13-2. Field photos and field noise survey sheets are included in Appendix G of ~~this~~the Draft EIR.

**Table 4.13-2. Measured Existing Noise Levels in the Study Area**

| | Weekday Hourly $L_{eq}$, dBA | | Weekend Hourly $L_{eq}$, dBA | |
|---|---|---|---|---|
| Location Number, Description (time, date) | Daytime | Nighttime | Daytime | Nighttime |
| ST1, 2501 Engelman Oak Ln (9:45 a.m.; 3/31/2020) | 47 | N/A | N/A | N/A |
| ST2, 2620 Via Viegas (10:48 a.m.; 3/31/2020) | 51 | N/A | N/A | N/A |
| ST3, Park North of S Grade Rd (11:48 a.m. 3/31/2020) | 46 | N/A | N/A | N/A |
| LT1,[1] Park near S. Grade Rd and Calle de Campadres (11:00 a.m.; 3/27/20–3/31/20) | 54–64 | 33–56 | 49–64 | 36–55 |
| LT2,[1] 2387 S. Grade Rd (11:00 a.m. 3/27/20–3/31/20) | 53–65 | 39–57 | 52–61 | 42–56 |

[1] Appendix G shows the long-term measurement ranges in further detail.
Notes: Daytime = 7 a.m. to 10 p.m.; Nighttime = 10 p.m. to 7 a.m.; N/A = no measurement was obtained at the corresponding location and timeframe.

[1] Field measurements were taken during the beginning of the stay-at-home orders associated with the COVID-19 outbreak. Therefore, noise levels may be artificially lower than normal.




\\PDCCITRDSGIS1\Projects_1\County_of_San_Diego\DPRMSA_557755\T033_Alpine_Park_HCP\Figures\Doc\EIR\Fig04_13-1_Noise_MeasurementLocs.mxd User: 10542 Date: 6/19/2021

**Figure 4.13-1**
**Short and Long-Term Measurement Locations**

# 4.13.4 Applicable Laws and Regulations

## 4.13.4.1 State

California requires each local government entity to perform noise studies and implement a noise element as part of its general plan. The purpose of the noise element is to limit the exposure of the community to excessive noise levels; the noise element must be used to guide decisions concerning land use. The County of San Diego General Plan is discussed below.

## 4.13.4.2 Local

### County of San Diego

The County ~~of San Diego~~ maintains applicable noise and vibration impact thresholds of significance in its document *County of San Diego, Guidelines for Determining Significance, Noise* (County of San Diego 2009). These guidelines define ~~a~~ noise-sensitive land use<u>s</u> as "[a]ny residence, hospital, school, hotel, resort, library, or similar facility where quiet is an important attribute of the environment" and summarize standards from various sources to address the various types of impact that could potentially occur with implementation of a given project. The sources of the noise and vibration thresholds include the County's Noise Ordinance and Noise Element of the General Plan Division, and the U.S Department of Transportation, Federal Transit Administration (FTA). Each of the thresholds that are applicable to the project are described in further detail, below.

#### Noise-Sensitive Land Uses Affected by Airborne Noise

For the potential impact of airborne noise on noise-sensitive land uses, the thresholds are based largely on the County's Noise Element and state that a significant impact will occur if project implementation will result in the exposure of any on- or offsite, existing or reasonably foreseeable future noise-sensitive land uses to exterior or interior noise in excess of any of the following:

A. Exterior Locations:
    i. 60 dB (CNEL); or
    ii. An increase of 10 dB (CNEL) over pre-existing noise.

B. Interior Locations:

    45 dB (CNEL) except for the following cases:

    i. Rooms which are usually occupied only a part of the day (schools, libraries, or similar facilities), the interior one-hour average sound level due to noise outside should not exceed 50 decibels (A).
    ii. Corridors, hallways, stairwells, closets, bathrooms, or any room with a volume less than 490 cubic feet.

## Project-Generated Airborne Noise

For the potential impact of project-generated noise on surrounding noise-sensitive land uses, the thresholds are based on the County's Noise Ordinance, which provides separate noise standards for construction and non-construction activities, as discussed below.

### Construction Noise

A significant noise impact will occur if noise generated by construction activities related to the project will exceed the limit specified in San Diego County Code Section 36.409, *Sound Level Limitations on Construction Equipment*. Section 36.409 states that "[e]xcept for emergency work, it shall be unlawful for any person to operate construction equipment or cause construction equipment to be operated, that exceeds an average sound level of 75 decibels for an eight-hour period, between 7 a.m. and 7 p.m., when measured at the boundary line of the property where the noise source is located or on any occupied property where the noise is being received."

### Non-Construction Noise

A significant noise impact will occur if noise generated by operational activities related to the project will exceed the limit specified in San Diego County Code Section 36.404, *General Sound Level Limits*, at the property line of the property on which the noise is produced or at any location on a property that is receiving the noise. Section 36.404 provides the limits shown in Table 4.13-3.

**Table 4.13-3. San Diego County Code Section 36.404 Noise Limits**

| Zone | Time | One-Hour Average ($L_{eq}$) Sound Level Limits, dBA [1,2] |
|---|---|---|
| (1) ~~R-S, R-D, R-R, R-MH, A-70, A-72, S-80, S-81, S-87, S-90, S-92~~RS, RD, RR, RMH, A70, A72, S80, S81, S87, S90, S92 and ~~R-V~~RV and ~~R-U~~RU with a density of less than ~~11~~10.9 dwelling units per acre. | 7 a.m. to 10 p.m. | 50 |
| | 10 p.m. to 7 a.m. | 45 |
| (2) ~~R-RO, R-C, R-M, S-86,~~ RRO, RC, RM, S86, FB-V5 and ~~R-V~~RV and ~~R-U~~RU with a density of ~~11~~10.9 or more dwelling units per acre. | 7 a.m. to 10 p.m. | 55 |
| | 10 p.m. to 7 a.m. | 50 |
| (3) ~~S-94,~~S94, FB-V4, AL-V2, AL-V1, AL-CD, RM-V5, RM-V4, RM-V3, RM-CD and all other commercial zones. | 7 a.m. to 10 p.m. | 60 |
| | 10 p.m. to 7 a.m. | 55 |
| (4) FB-V1, FB-V2, RM-V1, RM-V2 | 7 a.m. to 7 p.m. | 60 |
| | 7 p.m. to 10 p.m. | 55 |
| FB-V1, RM-V2 | 10 p.m. to 7 a.m. | 55 |
| FB-V2, RM-V1 | 10 p.m. to 7 a.m. | 50 |
| FB-V3 | 7 a.m. to 10 p.m. | 70 |
| | 10 p.m. to 7 a.m. | 65 |
| (5) ~~M-50, M-52~~M50, M52 and ~~M-54~~M54 | Anytime | 70 |
| (6) ~~S-82, M-56~~S82, M56 and ~~M-58~~M58 | Anytime | 75 |

[1] If the measured ambient level exceeds the applicable limit noted above, the allowable one-hour average sound level shall be the ambient noise level, plus three decibels.
[2] The sound level limit at a location on a boundary between two zones is the arithmetic mean of the respective limits for the two zones; provided however, that the one-hour average sound level limit applicable to extractive industries,

including but not limited to borrow pits and mines, shall be 75 decibels at the property line regardless of the zone which the extractive industry is actually located.

It is noted that the zoning of the project site and the surrounding uses is a mix of ~~S-80 (open space),~~ ~~R-R (rural residential),~~S80, *Open Space*, RR, *Rural Residential*, and ~~A-70 (limited agricultural use),~~A70, *Limited Agricultural Use*, which all fall under Zone 1. Therefore, the applicable base sound level limits (before any corrections for ambient noise levels) are 50 dBA $L_{eq}$ between 7 a.m. and 10 p.m. and 45 dBA $L_{eq}$ between 10 p.m. and 7 p.m. However, as noted in the table, the limits would be increased where existing daytime ambient noise levels exceed 50 dBA or existing nighttime ambient noise levels exceed 45 dBA.

## Groundborne Vibration

A significant vibration impact will occur if vibration generated by construction or operational activities related to the project will exceed limits specified by the County in the *County of San Diego Guidelines for Determining Significance for Noise* (County of San Diego 2009) or in the FTA guidelines *Transit Noise and Vibration Impact Assessment* (FTA 2018) at noise-sensitive land uses or other vibration-sensitive uses (such as certain research and manufacturing facilities). This includes new development which creates or locates noise-sensitive land uses or other vibration-sensitive uses in a location where they would be impacted by groundborne vibration and noise (such as developing a new residential project close to a railroad). The manual provides guidance for two types of potential impact: (1) damage to structures and (2) annoyance to people. Guideline criteria for each are provided in Tables 4.13-4 and 4.13-5. It is noted that potential building damage is assessed using PPV, whereas potential annoyance is assessed using $L_v$.

**Table 4.13-4. FTA Guideline Vibration Damage Criteria**

| Building Category (Structure and Condition) | PPV, in/s |
|---|---|
| I. Reinforced-concrete, steel, or timber buildings (no plaster) | 0.5 |
| II. Engineered concrete and masonry buildings (no plaster) | 0.3 |
| III. Non-engineered timber and masonry buildings | 0.2 |
| IV. Buildings that are extremely susceptible to vibration damage | 0.12 |

Source: FTA 2018

**Table 4.13-5. FTA Guideline Vibration Annoyance Criteria**

| | Ground-borne Vibration Level, $L_v$ | | |
|---|---|---|---|
| Land Use Category | Frequent Events[1] | Occasional Events[2] | Infrequent Events[3] |
| **Category 1:** Buildings where vibration would interfere with interior operations | 65 VdB[4] | 65 VdB[4] | 65 VdB[4] |
| **Category 2:** Residences and buildings where people normally sleep | 72 VdB | 75 VdB | 80 VdB |
| **Category 3:** Institutional land uses with primarily daytime use | 75 VdB | 78 VdB | 83 VdB |

Source: FTA 2018.
[1] "Frequent Events" is defined as more than 70 vibration events from the same source per day.
[2] "Occasional Events" is defined as between 30 and 70 vibration events from the same source per day.
[3] "Infrequent Events" is defined as fewer than 30 vibration events of the same kind per day.
[4] This criterion limit is based on levels that are acceptable for most moderately sensitive equipment, such as optical microscopes.

Accurate calculation of groundborne noise is a complex process typically reserved for assessing long-term impacts from rail projects. For the purposes of analyzing the project, it is assumed that compliance with the groundborne vibration thresholds would also achieve compliance with the groundborne noise thresholds. Because the vibration sources during construction, such as graders and bulldozers, would operate continuously for extended periods of time, the applicable vibration thresholds would be those for *frequent events*.

# 4.13.5 Project Impact Analysis

## 4.13.5.1 Methodology

### Construction Noise and Vibration

The evaluation of potential noise and vibration impacts associated with project construction was based on the construction equipment schedule and phasing assumptions developed by ~~the~~ County DPR, along with the methods described below.

#### Noise

Construction-related noise was analyzed using data and modeling methodologies from the Federal Highway Administration's (FHWA's) Roadway Construction Noise Model (RCNM) (FHWA 2008), which predicts noise levels at nearby receptors by analyzing the type of equipment, the distance from source to receptor, usage factor, and the presence or absence of intervening shielding between source and receptor. For the proposes of this analysis it is assumed that the calculated noise level would be equivalent to the 8-hour $L_{eq}$. RCNM is a comprehensive construction noise model developed and published by the federal government. Although the project is not specifically a roadway construction project, the model is broad enough to be applicable, providing noise data for all of the equipment types typically required during conventional construction. Therefore, it is considered appropriate for use in analyzing the project.

Project construction would be broken down into phases. Given the size of the proposed site, and in order to provide a conservative analysis, it was assumed that all phases of onsite construction could occur simultaneously with construction activity spread across the whole 25-acre site. To reflect the assumed distribution of equipment across the site, source-to-receptor distances used in the analysis were the acoustical average distances between the construction site and each receptor.[2] It should be noted that the RCNM program uses a hard site ground type, which conservatively applies that noise would decrease at a rate of 6 dB per doubling of distance, which is the default in the RCNM program.

#### Vibration

Construction-related vibration was analyzed using data and modeling methodologies provided by the FTA guidance manual (FTA 2018), as required by the County of San Diego ~~CEQA guidelines.~~Guidelines for Determining Significance. Although the project is not a transit project, the

[2] The acoustical average distance is used to represent noise sources that are mobile or distributed over an area (such as the project site); it is calculated by multiplying the shortest distance between the receiver and the noise source area by the farthest distance and then taking the square root of the product.

model provides vibration data for all of the equipment types typically required during conventional construction as well as methods for estimating the propagation of ground-borne vibration over distance. Therefore, it is considered appropriate for use in analyzing the project. Because vibration is of concern at structures, as opposed to areas of outdoor use, the distances used in the analysis are the closest distances from the construction areas to the nearest buildings.

The following equation from the guidance manual was used to estimate PPV for the assessment of potential building damage impacts:

$$PPV_{rec} = PPV_{ref} \times (25/D)^{1.5}$$

where $PPV_{rec}$ is the PPV at a receptor; $PPV_{ref}$ is the reference PPV at 25 feet from the equipment; D is the distance from the equipment to the receiver, in feet; and 1.5 is a default value related to the vibration attenuation rate through the ground.

The following equation from the guidance manual was used to estimate $L_v$ for the assessment of potential annoyance to people:

$$L_{v,rec} = L_{v,ref} - 30 \times \log(D/25)$$

where $L_{v,rec}$ is the $L_v$ at a receptor; $L_{v,ref}$ is the reference $L_v$ at 25 feet from the equipment; and D is the distance from the equipment to the receiver, in feet.

The project would not require high-impact construction methods, such as pile driving or blasting. Therefore, the highest ground-borne vibration levels would be associated with conventional heavy construction equipment such as bulldozers, excavators, and backhoes. FTA provides vibration source data for this type of equipment of 0.089 in/s PPV at a reference distance of 25 feet. FTA also sets vibration thresholds for damage of 0.2 in/s PPV and 0.12 in/s PPV for non-engineered timber and masonry buildings and buildings that are extremely susceptible to vibration, respectively.

## Operational Noise

The analysis of traffic noise in the study area was based on data from the Transportation Impact Analysis (TIA) for the project (Chen Ryan 2020). The analysis was conducted using a proprietary traffic noise model, with calculations based on data from the FHWA Traffic Noise Model, Version 2.5, Look-Up Tables (FHWA 2004). The inputs used in the traffic noise modeling included average daily traffic (ADT) volumes, assumed traffic mix and daily distribution (the percentage of automobiles versus medium trucks and heavy trucks during each hour of the day), and traffic speeds based on the posted speed limits. The traffic mix assumed was a generic traffic mix (98.4% automobiles, 0.9% medium trucks, and 0.7% heavy trucks), which is representative of a typical local road. To quantify the effects of the project, traffic noise was analyzed at a reference distance of 50 feet from the roadway centerline using different scenarios: (1) existing, (2) existing with project, (3) near-term future, and (4) near-term future with project.

Noise from onsite operations was analyzed using field measurements of similar type of events, specifically soccer fields (Wieland Acoustics 2009) and skate park<u>s</u> activities presented in Table 4.13-6 and 4.13-7. Soccer fields were measured at two locations, in San Diego and Costa Mesa and included a varying number of spectators, players, and referees (from 50 to 115). It should be noted that the project would not include organized sports, so the noise analysis for soccer fields is considered conservative as the project ~~activity~~ would not <u>conceivably</u> include referees, officials, or a

significant number of spectators. Skate parks were measured at two ~~existing~~ locations~~,~~ in Lake Forest and Ladera Ranch~~,~~ in Orange County.

**Table 4.13-6. Measured Noise Levels at Soccer Fields**

| Noise Source | Measured Average ($L_{eq}$) Noise Level | Acoustical Average Distance[3] |
|---|---|---|
| Soccer game[1] | 59.9 dBA | 115 feet |
| Soccer game[2] | 52.5 dBA | 190 feet |

[1] Measured at Crusaders Youth Soccer games, Dailard Elementary Joint Use Park, San Diego. Total number of attendees (players on and off the field, referees, other officials, and spectators) varied from approximately 50 to 115 people.
[2] Wieland Acoustics 2009. Little League soccer game, Jack R. Hammett Sports Complex (formerly "The Farm"), Costa Mesa, CA. There were 11 players per team with approximately 35 spectators and a referee and other officials.
[3] The acoustical average distance is used to represent noise sources that are mobile or distributed over an area. It is calculated by multiplying the shortest distance between the receptor and construction area boundary by the farthest distance and then taking the square root of the product.

**Table 4.13-7. Measured Noise Levels at Skate Parks**

| Noise Source | Measured Average ($L_{eq}$) Noise Level | Acoustical Average Distance[3] |
|---|---|---|
| Skate Park (Lake Forest)[1, 4] | 66.5 dBA | 60 feet |
| Skate Park (Ladera Ranch)[2] | 59.6 dBA | 90 feet |

[1] Source: ICF 2021.
[1] Measured at Etnies Skate Park, Lake Forest, CA. Maximum number of skaters = 15.
[2] Measured at Ladera Ranch Skate Park, Ladera Ranch, CA. Maximum number of skaters = 5.
[3] The acoustical average distance is used to represent noise sources that are mobile or distributed over an area; it is calculated by multiplying the shortest distance between the receptor and construction area boundary by the farthest distance and then taking the square root of the product.
[4] It should be noted that the Etnies skate park included amplified music, which set the baseline of the noise measurement. Amplified music from the speaker was measured at approximately 57 dBA $L_{eq}$, approximately 10 dB below the measured noise from active skaters. The amplified music was measured while skating activity was absent. Other noise sources present during this time were automobiles passing along State Route 241. Noise measured as the baseline was 10 dB below the measured skating activity and is considered negligible.

Other land uses that would be included as part of the project, including the dog park, basketball and pickleball courts, the bike ~~park~~skills area, and baseball fields~~,~~ were analyzed using default information included in SoundPlan acoustical software. The SoundPlan modeling platform was used to model the operational noise from the noise sources referenced as well as accurately model the surrounding land uses and any intervening topography, including the proposed berm.

# 4.13.5.2 Thresholds of Significance

## Appendix G of the ~~State~~ CEQA Guidelines

The following significance criteria are based on Appendix G of the ~~State~~ CEQA Guidelines Significance Determination Thresholds and provide the basis for determining significance of impacts associated with noise and vibration resulting from the project. The determination of whether a noise impact would be significant is based on the applicable noise thresholds and the professional judgment of qualified personnel at ICF and based wholly on the substantial evidence in the administrative record.

Impacts are considered significant if the project would result in any of the following:

1. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.
2. Generation of excessive groundborne vibration or groundborne noise levels.
3. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels.

## County of San Diego Guidelines for Determining Significance

The CEQA thresholds provided by the *County of San Diego Guidelines for Determining Significance for Noise* (County of San Diego 2009) state that a significant impact would occur if project implementation would result in the exposure of any on- or offsite existing or reasonably foreseeable future noise-sensitive land use to exterior or interior noise in excess of any of the following:

1. A construction noise level that exceeds an average sound level of 75 dB for an 8-hour period, between 7 a.m. and 7 p.m., when measured at the boundary line of the property where the noise source is located or on any occupied property where the noise is being received, or
2. Operational noise levels that exceed
    a. Exterior Locations:
        1) 60 dB community noise equivalent level (CNEL)
        2) An increase of 10 dB (CNEL) over pre-existing noise
    b. Interior Locations:
        1) 45 dB (CNEL) except for the following cases:
            a) For rooms that are usually occupied only a part of the day (schools, libraries, or similar facilities), the interior 1-hour average sound level due to noise outside should not exceed 50 dBA.
            b) Corridors, hallways, stairwells, closets, bathrooms, or any room with a volume less than 490 cubic feet.

# 4.13.5.3 Project Impacts and Mitigation Measures

***Threshold 1: Implementation of the project would result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.***

## County Park and Trails

### Impact Discussion

#### Construction

Two types of short-term noise impacts could occur during project construction. First, construction vehicles would incrementally increase noise levels on access roads. This would include construction worker vehicles and haul trucks traveling to and from the project site. Although there would be a relatively high single-event noise level, which could cause an intermittent noise nuisance (e.g., passing trucks at 50 feet would generate up to 77 dBA), the effect on longer-term ambient noise levels would be small. The grading and excavation phase of construction would include up to 3 haul truck trips per day and a maximum of 18 worker trips per day (see Appendix G). Therefore, impacts would be minimal related to the short-term noise associated with commuting construction workers and the transporting of equipment and materials to the project site.

The second category of construction noise would be noise generated during onsite project construction. Construction would occur only during the periods permitted by the County's ~~Municipal Code~~Noise Ordinance (7 a.m. to 7 p.m.) Detailed construction noise analysis RCNM output tables are provided in Appendix G. The list of construction equipment broken down by phase and noise levels at a distance of 50 feet is summarized Table 4.13-8, and the normalized results for the loudest phase of construction are summarized in Table 4-13-9.

**Table 4.13-8. Construction Equipment and Noise at 50 Feet**

| Phases | Equipment Type | Number of Pieces of Equipment | Noise Level at 50 Feet (dBA $L_{eq}$)[1,2] | Absolute Noise Level by Phase at 50 Feet (dBA $L_{eq}$)[1,3] |
|---|---|---|---|---|
| Grubbing | Dozer | 3 | 78 | |
| | Excavator | 1 | 77 | |
| | | | | 84 |
| Grading | Dozer | 3 | 78 | |
| | Excavator | 1 | 77 | |
| | Roller | 1 | 73 | |
| | Front End Loader | 1 | 75 | |
| | Backhoe | 1 | 74 | |
| | Scraper | 1 | 80 | |
| | | | | 86 |

| Phases | Equipment Type | Number of Pieces of Equipment | Noise Level at 50 Feet (dBA $L_{eq}$)[1,2] | Absolute Noise Level by Phase at 50 Feet (dBA $L_{eq}$)[1,3] |
|---|---|---|---|---|
| Drainage | Dozer | | 78 | |
| | Compressor (air) | | 76 | |
| | Backhoe | | 74 | |
| | | | | 84 |
| Construction | Dozer | 2 | 78 | |
| | Crane | 1 | 73 | |
| | Compressor (air) | 1 | 76 | |
| | Generator | 1 | 78 | |
| | Front End Loader | 3 | 75 | |
| | | | | 85 |
| Construction | Paver | 1 | 74 | |
| | Paver Scarafier | 1 | 83 | |
| | Roller | 1 | 73 | |
| | | | | 84 |
| Trenching | Excavator | 1 | 77 | |
| | Front End Loader | 1 | 75 | |
| | | | | 79 |

[1] Values rounded to the nearest whole number.
[2] Values represent noise level for each piece of equipment.
[3] Represents the logarithmic total of all pieces of equipment.

**Table 4-13.9. Predicted Construction Noise (Park) at the Closest Noise-Sensitive Land Uses**

| Analysis Location | Combined Construction 8-Hour Average Noise Level for the Loudest Phase of Construction, $L_{eq}$[1] |
|---|---|
| Closest noise-sensitive land uses (residences) north of project site (310 feet) | 70 dBA |
| Closest noise-sensitive land uses (residences) east of project site, across South Grade Road from project site (225 feet) | 73 dBA |
| Closest noise-sensitive land uses (residences) south of project site, across South Grade Road from project site (285 feet) | 71 dBA |

[1] Values rounded to the nearest whole number.

The loudest phase of construction is predicted to be the grading phase. The construction equipment used to calculate construction noise during this and other phases of construction is detailed in Appendix G. The predicted construction noise level at the noise-sensitive land uses to the north, east, and south would be 70, 73, and 71 dBA respectively. This is below the County's 8-hour $L_{eq}$ standard of 75 dBA and within the range of ambient noise levels measured in the project vicinity. It should be noted that the distances calculated above are to the property lines and that the physical residences are generally located farther from the center of construction. Additionally, as discussed above, RCNM uses a more reflective ground type. In actuality additional ground absorption would likely occur, which would further reduce noise levels on the project site.

One additional construction component that could be part of the project would involve the extension of a sewer line to tie into the existing sewer line north or west/northwest of the project site. Sewer line construction would require construction in the middle of South Grade Road and other local roadways and would take place within 50 feet of noise-sensitive land uses. The construction equipment used to calculate construction noise during this phase of construction is included in Appendix G.

**Table 4.13-10. Predicted Construction Noise (Sewer Extension) at the Closest Noise-Sensitive Land Uses**

| Analysis Location | Combined Construction 8-Hour Average Noise Level for the Loudest Phase of Construction, $L_{eq}$[1] |
|---|---|
| Noise sensitive receptors (residences) located 50 feet from the roadway | 79 dBA |

[1] Values rounded to the nearest whole number.

The predicted construction noise level at noise-sensitive land uses located 50 feet off the alignment of South Grade Road or other roadways where construction may occur would be up to 79 $L_{eq}$. This noise level is based on the assumption that 50 feet of pipe would be installed per day (based on assumptions provided by ~~the~~ County DPR). It should be noted that the physical residences are generally located farther than 50 feet from the roadway alignment. As such, noise levels are considered a conservative estimate. However, as the County's ~~Municipal Code~~Noise Ordinance references, "when measured at the boundary line of the property" or "on any occupied property where the noise is being received" noise levels of this magnitude would exceed the County's 8-hour $L_{eq}$ standard of 75 dBA threshold.

The predicted noise levels for project construction are worst case estimates. Therefore, it is likely that actual construction noise levels will often be lower than those predicted in the tables above. The predicted construction noise levels for the park would comply with the County's 8-hour $L_{eq}$ standard of 75 dBA. However, construction associated with the extension of the sewer system would exceed the County's 8-hour threshold for construction noise~~.~~ **(Impact-NOI-1).**

### Operation

The project would generate new vehicle trips that would add to traffic on surrounding streets and change the associated traffic noise. Table 4.13-11 summarizes the predicted noise levels both with and without the project during existing and future near-term conditions. Roadway segments considered in the TIA include South Grade Road west of Via Viejas and east of Via Viejas (refer to Appendix G for the noise modeling). The results indicate that traffic noise levels with the project would not exceed the County's traffic noise impact thresholds (i.e., traffic noise would not exceed 60 dB CNEL or cause any increase of 10 dB or more relative to existing conditions).

**Table 4.13-11. Estimated Traffic Noise Levels**

| | Estimated Traffic Noise Levels at 50 feet from Roadway Centerline (dB CNEL)[1] | | | | | |
|---|---|---|---|---|---|---|
| Roadway Segment | Existing | Existing + Project | Increase over Existing (dB) | Near-Term | Near-Term + Project | Increase over Existing (dB) |
| **South Grade Road** | | | | | | |
| West of Via Viejas | 61 | 62 | 1 | 61 | 62 | 1 |
| East of Via Viejas | 60 | 60 | 0 | 60 | 61 | 1 |

[1] Values rounded to the nearest whole number.

Noise from the proposed athletic fields would consist primarily of human voices, with varying combinations of talking, shouting, and laughing from coaches, players, and parents. For some activities (soccer, baseball), whistles from coaches are also common. ~~Noise from the skate~~While whistles are not anticipated as no organized sports are proposed as part of the project, the soccer analysis referenced above included whistles and is therefore considered to be a conservative analysis. Noise from the all-wheel park would consist primarily of patrons riding skateboards and from voices similar to the proposed athletic fields. Other noise sources would include dogs barking and balls being used on basketball and pickleball courts. As discussed above, the SoundPlan ~~software~~modeling modeled all land uses included on the project site.

Noise measurements were conducted at schools and joint-use fields that were representative of the types of activities that would occur at the athletic fields. Similarly, field measurements were conducted at skate parks that are representative of the types of activities that would occur at the proposed ~~skate~~all-wheel park. Representative noise data from each set of measurements are summarized in Tables 4.13-6 and 4.13-7, above. Noise measured at the fields did not include the use of included amplified speech or music (e.g., bullhorns or PA systems). As discussed above, the skate park measurements included amplified music as the baseline (without skate park attendees); however, this was approximately 10 dB below the measured noise level with skate park attendees. It should be noted that this project would not include any amplified speech or music.

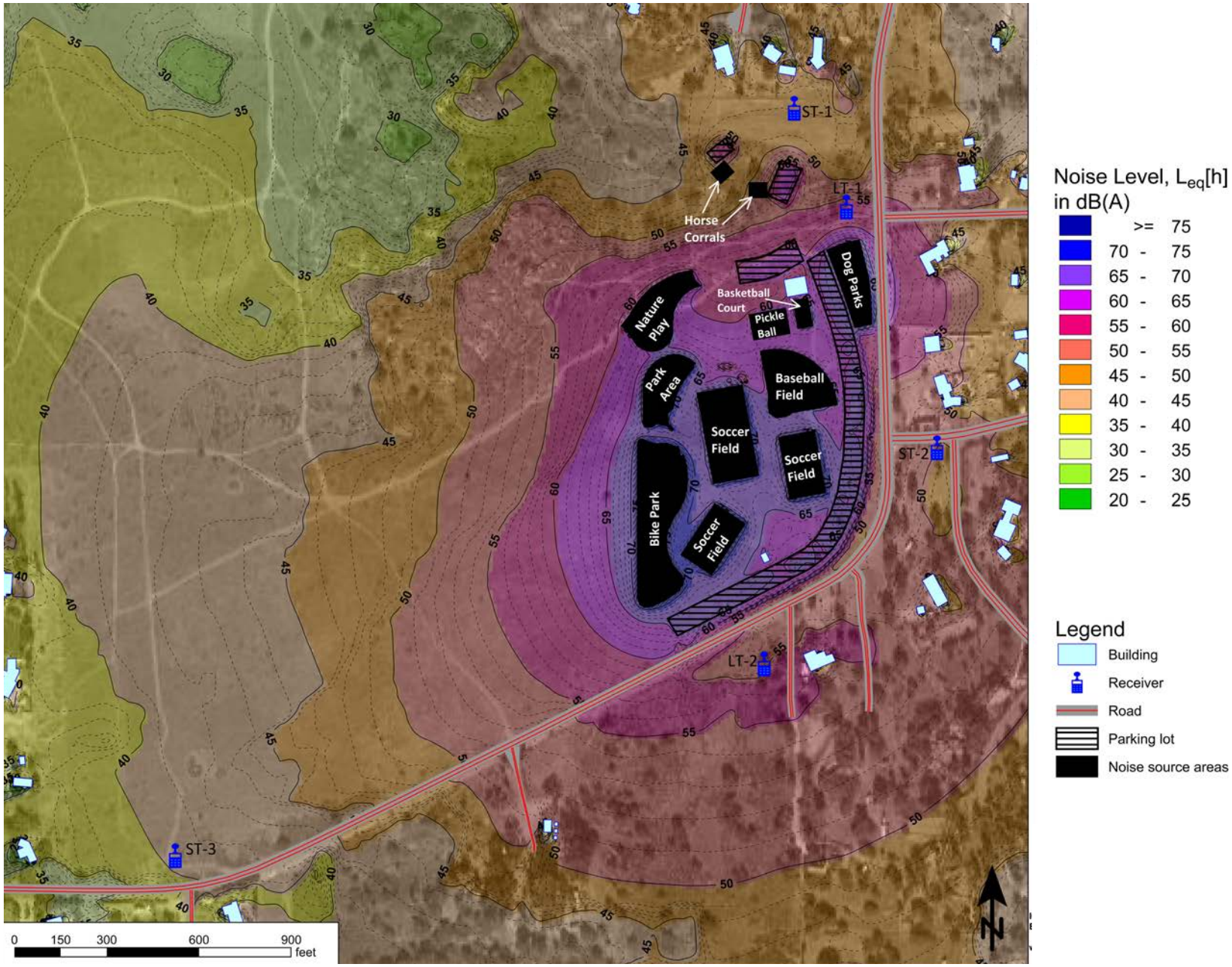
Noise levels for each operational component discussed above were analyzed at the noise measurement locations shown on Figure 4.13-1. The worst-case noise levels for operational noise are summarized in and assessed against the applicable sound level limits. As stated in Section 4.13.4.2 (see Table 4.13-12), the base one-hour average ($L_{eq}$) daytime sound level limit for all of the neighboring residential uses is 50 dBA. However, because the measured average ambient noise levels at each location (ST-2 and LT-2) were greater than 50 dBA, the actual limits ~~we~~are increased to the ambient level plus 3 dB. Measurement location ST-1 registered a measured noise level of 47 dBA. While LT-1 ranged from 53–65 dBA during the daytime hours, the measured noise level at ST-1 is more conservative ~~and therefore was used in this analysis.~~; however, LT-1 is more representative of homes in the general vicinity. Therefore, both are included. For informational purposes, the predicted noise levels are compared to both the unadjusted and the adjusted sound level limits in Table 4.13-12, but the assessment of impact is based solely on the comparison with the adjusted limits.

**Table 4.13-12. Predicted Operational Noise Levels at the Closest Noise-Sensitive Land Use**

| | 1-hour $L_{eq}$, dBA[1] | | | | Exceeds Sound Level Limits? | | |
|---|---|---|---|---|---|---|---|
| Analysis Location | Predicted | Measured Average Daytime Ambient | Base (Unadjusted) Sound Level Limit | Adjusted Sound Level Limit[2] | Unadjusted[3] | Adjusted | Significant Impact? |
| **Onsite Activity** | | | | | | | |
| ST-1 North of Project Site | 48 | 47 | 50 | 50 | No | No | No |
| ST-2 East of Project Site | 50 | 51 | 50 | 54 | No | No | No |
| LT-1 North of Project Site | 54 | 57[5] | 50 | 59 | Yes | No | No |
| LT-2 South of Project Site | 56 | 57[4] | 50 | 60 | Yes | No | No |
| ST-3 Southwest of the Project Site | 40 | 46 | 50 | 50 | No | No | No |

[1] Values rounded to the nearest whole number.
[2] Adjusted sound level limit = measured average daytime ambient $L_{eq}$ + 3 dB.
[3] Compliance with the unadjusted noise threshold is included for informational purposes and is only required if the ambient noise levels are below the applicable unadjusted threshold.
[4] Daytime noise levels measured at measurement location LT-2 ranged from 53–65 dBA $L_{eq}$. ~~Therefore, the~~Therefore, the arithmetic average of the measured daytime level has been included as the representative daytime measured noise level.
[5] Daytime noise levels measured at measurement location LT-1 ranged from 54–64 dBA $L_{eq}$. Therefore, the arithmetic average of the measured daytime level has been included as the representative daytime measured noise level.

The predicted noise levels for the park activities all comply with adjusted sound level limits. Additionally, the predicted composite operational noise level assumes that all activities (an active ~~skate~~all-wheel park with up to 15 skaters, three soccer games, the basketball court in use, etc.) would occur simultaneously. This analysis is considered conservative as these uses would rarely, if ever, all be active at the same time. Figure 4.13-2 shows the calculated noise contours associated with the project~~.~~ **(Impact-NOI-2).**

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Source: ICF, 2021.

**Figure 4.13-2**
**Operation Noise Contours**

## Impact Determination

### Construction

**Impact-NOI-1: Construction Noise During Installation of the Sewer System.** Predicted noise levels associated with construction for the park would comply with the County's 8-hour $L_{eq}$ standard of 75 dBA. However, construction associated with the extension of the sewer system would exceed the County's 8-hour threshold for construction noise. As such~~,~~ mitigation would be required to reduce impacts to less than significant. To address noise impacts from construction of the proposed sewer extension, installation of a barrier that breaks the line of sight between the source and receiver would provide 5 dB noise attenuation (FHWA 2017).

### Operation

**Impact-NOI-2: Onsite Operational Noise at the Active Park.** Although the Noise Impact Analysis did not identify any significant impacts, a number of best practices and operational controls would be in place during the operation of the Alpine Park and were assumed as part of the analysis. These are based on typical rules and regulations enforced at existing County parks. To ensure these best practices and controls are incorporated into the ~~proposed~~ project, **MM-NOI-2** and **MM-NOI-3** would be required to reduce onsite operational noise impacts to less than significant.

## Mitigation Measures

For **Impact-NOI-1: Construction Noise During Installation of the Sewer System**

**MM-NOI-1: Install Temporary Sound Barriers.** Prior to and during construction activities for the proposed sewer line extension, the construction contractor shall install temporary sound barriers that break the line of sight (a minimum ~~height~~ of 10 feet) between construction equipment and noise-sensitive receivers. These soundwalls shall be installed at any location where construction is located within 100 feet of the property line of an occupied residence or other noise-sensitive land use, such as schools.

For **Impact-NOI-2: Onsite Operational Noise at the Active Park**

**MM-NOI-2: Enforce Standard Rules and Regulations.** County DPR shall enforce all applicable standard rules and regulations for DPR facilities including, but not limited to, the following:

- Quiet Hours are from 10:00 p.m. to 7:00 a.m.
- Dogs must be licensed and restrained on a leash not longer than 6 feet and attended at all times. (~~This~~Leash restriction will not apply to dogs within the designated dog park space.)
- No person shall disturb the peace and quiet of a County ~~p~~Park by any loud or unusual noise, or by the sounding of automobile horns or noise-making devices, or by the use of profane, obscene, or abusive language or gestures.
- No person shall use, transport, carry, fire, or discharge any fireworks, firearm, weapon, air gun, archery device, slingshot, or explosive of any kind across, in, or into a County ~~p~~Park.
- The applicable requirements of DPR Policy Number C-06, Noise Regulation in County Parks will be enforced.

**MM-NOI-3: Set Operational Limits and Restrictions.** Except for occasional special events conducted pursuant to a specific permit (conditional use permit, special event permit, etc.), ~~County DPR shall~~ enforce the following operational restrictions:

- Prohibit the use of noise-generating equipment (noise-makers, bullhorns, air horns, amplified stereos/radios, etc.) by spectators. The only exception is for official use of the announcer's PA systems or other devices required for proper operation of the intended and approved activities.
- End all onsite events no later than 10:00 p.m.

### Level of Significance After Mitigation

With the inclusion of **MM-NOI-1 through MM-NOI-3**, **Impact NOI-1** and **Impact NOI-2** would be reduced to less-than-significant levels.

## Open Space~~/Preserve~~

### Impact Discussion

#### Construction

The open space~~/preserve~~ portion of the project would not involve any construction that would result in increases in noise at nearby noise-sensitive land uses.

#### Operation

The open space~~/preserve~~ portion of the project would not include extensive noise-producing activities. Activities that could occur in association with passive recreation could include people hiking, riding horses, or walking dogs within the recreation area. These activities would not increase noise levels at nearby noise-sensitive land uses.

### Impact Determination

Impacts related to increasing ambient noise levels in the open space~~/preserve~~ area would be less than significant.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

Impacts would be less than significant.

***Threshold 2: Implementation of the project <u>would not</u> expose persons to or generate excessive groundborne vibration or groundborne noise levels.***

## County Park and Trails

### Impact Discussion

#### Construction

Vibration intensive construction equipment such as pile drivers or vibratory rollers would not be used as part of the project. Table 4.13-8 above provides a list of construction equipment that would be used as part of the project. As discussed, typical vibration levels of construction equipment such as bulldozers would be on the order of 0.089 PPV at a distance of 25 feet from the source. Based on the damage criteria set forth by FTA, levels of vibration would be below the threshold of damage at a distance of 25 feet. No vibration-sensitive receptors are located within 25 feet of where construction would occur.

#### Operations

Once operational, there would be no substantial sources of groundborne vibration at the project site. It is possible that site maintenance would occasionally require mechanized equipment, but such equipment would be no larger than the construction equipment analyzed above. Noting that the construction vibration analysis found vibration levels to be well below adopted thresholds at all sensitive receptors, it is clear that offsite vibration from occasional site maintenance would be negligible.

### Impact Determination

Impacts related to groundborne vibration during construction and operation would be less than significant.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

Impacts would be less than significant.

## Open Space~~/Preserve~~

### Impact Discussion

#### Construction

The open space~~/preserve~~ portion of the project would not involve any construction that would result in vibration at nearby sensitive land uses.

#### Operation

During operations the open space~~/preserve~~ portion of the project would not include vibration producing activities.

### Impact Determination

Impacts due to groundborne vibration during construction and operations would be less than significant.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

Impacts would be less than significant.

***Threshold 3: The project <u>would not</u> be located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels.***

## County Park~~ and~~, Trails<u>, and Open Space</u>

### Impact Discussion

The closest airport is Montgomery Gibbs executive airport approximately 22-miles west of the project site. Therefore, the project site would not be affected by noise from any airport land use plan. Periodic aircraft flyovers could occur; however, this would not be considered an impact.

### Impact Determination

There would be no impact related to being located near an airstrip or airport.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

There would be no impact.

## ~~Open Space/Preserve~~

#### ~~Impact Discussion~~

~~The closest airport is Montgomery Gibbs executive airport approximately 22 miles west of the project site. Therefore, the project site would not be affected by noise from any airport land use plan. Periodic aircraft flyovers could occur; however, this would not be considered an impact.~~

### ~~Impact Determination~~

~~There would be no impact related to being located near an airstrip or airport.~~

### ~~Mitigation Measures~~

~~No mitigation is required.~~

### ~~Level of Significance After Mitigation~~

~~There would be no impact.~~

## 4.13.6 Summary of Significant Impacts

**Table 4.13-13. Summary of Significant Noise Resource Impacts and Mitigation Measures**

| Summary of Potentially Significant Impact(s) | Summary of Mitigation Measure(s) | Level of Significance After Mitigation | Rationale for Finding After Mitigation |
|---|---|---|---|
| **Impact-NOI-1: Construction Noise During Installation of the Sewer System** | **MM-NOI-1 Install Temporary Sound Barriers.** | Less than Significant | Installation of temporary soundwalls would reduce noise from construction by a minimum of 5 dB, which would reduce predicted construction noise levels to below the County's 75 dBA threshold. |
| **Impact-NOI-2: Onsite Operational Noise at the Active Park** | **MM-NOI-2: Enforce Standard Rules and Regulations**<br>**MM-NOI-3: Set Operational Limits and Restrictions** | Less than Significant | To control operational noise to the greatest extent practical. |

Section 4.14
# Population and Housing

## 4.14.1 Overview

This section provides an analysis of the project's impacts related to population and housing.

## 4.14.2 Existing Conditions

Population in the unincorporated area of San Diego County has experienced growth since 1990 and is forecasted to continue to grow in the next few decades (County of San Diego 2011). Growth varies among Community Planning Areas (CPAs) and Subregions (County of San Diego 2011). Table 4.14-1 shows the existing and projected population within the unincorporated area and the San Diego ~~County~~region.

**Table 4.14-1. Existing and Projected Population in Unincorporated San Diego County**

| Jurisdiction | 2010 Population (Census) | 2020 Population | 2035 Population | 2050 Population | Average Annual Growth Rate | Percent Change Between 2010 and 2050 |
|---|---|---|---|---|---|---|
| Unincorporated | 486,564 | 543,471 | 625,809 | 662,195 | 0.8% | 36.1% |
| San Diego Region | 3,095,313 | 3,435,713 | 3,853,698 | 4,068,759 | 0.7% | 31.4% |

Source: SANDAG 2013.

The project site consists of approximately 96.6 acres of undeveloped land within the unincorporated community of Alpine in east San Diego County. The project site falls ~~under~~within the ~~jurisdiction~~boundary of the County ~~of San Diego~~ Alpine Community Plan, amended on December 14, 2016. The 2010 San Diego Association of Governments (SANDAG) estimates for population and housing in the Alpine CPA identify a population of 17,609 with a total of 6,551 housing units (County of San Diego 1979). Existing development within the Alpine CPA has a rural character typified by light agricultural activities practiced in conjunction with residential uses (County of San Diego 1979). As discussed in Section 4.11, *Land Use and Planning*, the project site is subject to a Semi-Rural Residential (SR-2) land use designation. Figure 4.11-1 shows the ~~general plan~~General Plan land use designations of the project site and surrounding land uses.

## 4.14.3 Applicable Laws and Regulations

### 4.14.3.1 Federal

There are no applicable federal regulations regarding population and housing.

## 4.14.3.2 State

There are no applicable ~~s~~State regulations regarding population and housing.

## 4.14.3.3 Regional

### San Diego Association of Governments San Diego Forward: The Regional Plan

SANDAG is the San Diego region's primary public planning, transportation, and research agency and provides a public forum for regional policy decisions about growth and planning. In 2015, SANDAG adopted *San Diego Forward: The Regional Plan*, which includes an implementation program for growth within the San Diego region through 2050. The regional plan is built on an integrated set of public policies, strategies, and investments to maintain, manage, and improve the transportation system. Furthermore, the regional plan, including its Sustainable Communities Strategy, commits to reducing emissions from transportation sources to comply with Senate Bill 375, improving public health, and meeting the National Ambient Air Quality Standards. The Sustainable Communities Strategy included in the regional plan envisions reducing greenhouse gas emissions through strategies such as focusing on housing and job growth in urbanized areas where there is existing and planned transportation infrastructure, employing smart growth land use policies, investing in a transportation network, addressing the housing needs of all economic segments of the population, and implementing the regional plan through incentives and collaboration (SANDAG 2015).

## 4.14.3.4 Local

### County of San Diego General Plan ~~Update~~

The following population and housing goals and policies from the general plan are applicable to the project:

**GOAL LU-2 Maintenance of the County's Rural Character.** Conservation and enhancement of the unincorporated County's varied communities, rural setting, and character.

**LU-2.2 Relationship of Community Plans to the General Plan.** Community Plans are part of the General Plan. These plans focus on a particular region or community within the overall General Plan area. They are meant to refine the policies of the General Plan as they apply to a smaller geographic region and provide a forum for resolving local conflicts. As legally required by State law, Community Plans must be internally consistent with General Plan goals and policies of which they are a part. They cannot undermine the policies of the General Plan. Community Plans are subject to adoption, review and amendment by the Board of Supervisors in the same manner as the General Plan.

**LU-2.8 Mitigation of Development Impacts.** Require measures that minimize significant impacts to surrounding areas from uses or operations that cause excessive noise, vibrations, dust, odor, aesthetic impairment and/or are detrimental to human health and safety.

**GOAL H-2 Neighborhoods That Respect Local Character.** Well-designed residential neighborhoods that respect unique local character and the natural environment while expanding opportunities for affordable housing.

**Policy H-2.1 Development that Respects Community Character.** Require that development in existing residential neighborhoods be well designed so as not to degrade or detract from the

character of surrounding development consistent with the Land Use Element. [See applicable community plan for possible relevant policies.]

### ~~1979~~ Alpine Community Plan

The following population and housing goals, policies, and recommendations from the Alpine Community Plan are applicable to the project.

#### Chapter 1, Community Character

**Goal 1B:** Preserve and maintain the overall rural character of the semi-rural development area (one dwelling unit per acre to less than 20 acres per dwelling unit density) as a transition between village and the rural lands areas.

#### Chapter 3, Housing

**Goal 2:** Encourage community involvement in planning activities and in projects affecting housing policies and programs.

**Goal 3:** To encourage and reinforce the goal of keeping Alpine a safe, pleasant and rural place to live. It is the goal of the Alpine Planning Group to promote and encourage the safety and tranquility of private residences.

# 4.14.4 Project Impact Analysis

## 4.14.4.1 Methodology

The project would implement the development of Alpine Park and associated trails as well as the conservation of approximately 70 acres of open space~~/preserve~~. The following section evaluates the effects on population and housing (as described above) should the project be implemented. Based on the existing conditions, the analysis assesses the direct and indirect impacts related to population and housing using the thresholds presented below.

## 4.14.4.2 Thresholds of Significance

### Appendix G of the ~~State~~ CEQA Guidelines

Based on guidance provided in Appendix G of the ~~State~~ CEQA Guidelines, the project would result in a significant impact if it would:

1. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure).
2. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.

### County of San Diego Guidelines for Determining Significance

The County ~~of San Diego~~ does not have specific guidelines for determining significance for population and housing impacts.

# 4.14.4.3 Project Impacts and Mitigation Measures

***Threshold 1: Implementation of the project would not induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure).***

## County Park and Trails

### Impact Discussion

The project would not create permanent residential structures on the project site. However, one approximately 1,200-square-foot volunteer pad is proposed in the ~~western~~northern portion of the proposed park. A volunteer pad is a permanent staging area for a recreational vehicle or similar vehicles. ~~One~~A live-on volunteer, maintenance staff, and a park ranger would ~~live on site full time to~~ help with maintenance and management of the ~~proposed park~~property. Electric facilities proposed at the administrative facility/ranger station would be extended to connect to the volunteer pad. As the site is currently subject to a Semi-Rural Residential (SR-2) land use designation, the use of the project site as a park with one permanent resident would not induce substantial unplanned population growth.

The project would either connect to the existing sewer system or include a septic system to serve the restroom facilities, administration facility/ranger station, and volunteer pad. An onsite connection to an existing sewer line is one of the two options available for sewage disposal at the proposed site. This option would consist of connecting to the existing sewer line within Tavern Road, west of the project site, or the existing sewer line within the northern portion of South Grade Road near the intersection with Alpine Boulevard. This component of the project would extend infrastructure (the sewer line), but it would only serve the project site; it would not provide sewage disposal services to any other areas. Therefore, the project would not extend infrastructure such that it would indirectly induce substantial unplanned population growth.

### Impact Determination

Impacts would be less than significant.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

Impacts would be less than significant.

## Open Space~~/Preserve~~

### Impact Discussion

The open space~~/preserve~~ uses of the project would not induce substantial unplanned population growth or extend infrastructure such that it would indirectly induce substantial unplanned population growth.

### Impact Determination

There would be no impacts.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

There would be no impacts.

***Threshold 2: Implementation of the project <u>would not</u> displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.***

## County Park and Trails

### Impact Discussion

The ~~c~~County park and trails portion of the project would not displace existing people or housing. Therefore, the construction of replacement housing elsewhere would not be necessary.

### Impact Determination

There would be no impacts.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

There would be no impacts.

## Open Space~~/Preserve~~

### Impact Discussion

The open space~~/preserve~~ portion of the project would not displace existing people or housing. Therefore, the construction of replacement housing elsewhere would not be necessary.

### Impact Determination

There would be no impacts.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

There would be no impacts.

## 4.14.5 Summary of Significant Impacts

There would be no significant impacts associated with population and housing.

# 4.15.1 Overview

This section summarizes the existing conditions, regulatory framework, and potential impacts on public services (fire, police, parks, schools, and other public facilities) that could result with implementation of the project.

# 4.15.2 Existing Conditions

## 4.15.2.1 Fire Protection

Fire protection services for the project site are provided by the Alpine Fire Protection District (FPD), which was formed on December 19, 1957, and covers 27.5 square miles (County of San Diego 2011a). The Alpine FPD provides a variety of emergency response services, including fire suppression, emergency medical services, hazardous materials response, and public assistance. The Alpine FPD dedicated Station 17 at 1364 Tavern Road on March 17, 2006. The district has two Type I (structure fire) and one Type III (wildland fire) engines, two command vehicles, two support/utility vehicles, and a multi-casualty trailer. Additionally, Station 17 also houses one Medic Unit provided by a joint operating agreement with American Medical Response, Grossmont Health Care District, and the County ~~of San Diego~~ (County of San Diego 2011a).

~~Because~~ Wildland fire protection for the immediate area of Alpine is ~~a designated aks area for wildfires, Wildland fire protection is~~ provided ~~by~~to State Responsibility Area (SRA) wildlands by ~~the~~ California Department of Forestry and Fire Protection (CAL FIRE), San Diego Unit. CAL FIRE also provides structural fire and rescue services to the ~~San Diego County~~ unincorporated area~~s~~ as the contract provider of services for the San Diego County ~~Fire Authority~~FPD. CAL FIRE provides regional dispatch services via the Monte Vista dispatch center, and offers specialized wildfire support via air tankers, helicopters, bulldozers, hand crews, and related resources for wildfire suppression (Rohde and Associates 2020).

Some parts of Alpine have Local Responsibility Area (LRA) structural services provided by the Alpine FPD, while CAL FIRE provides wildland fire protection. Both agencies respond concurrently in a coordinated manner when needed. Nearby federal lands of the Cleveland National Forest are under the jurisdiction of United States Department of Agriculture, Forest Service (USFS). The USFS is responsible for wildland fire protection on the National Forest and maintains a fire station in the Community of Alpine. Automatic Aid agreements between CAL FIRE, USFS, and Alpine FPD allow for response by the closest appropriate resource to a reported emergency, regardless of jurisdictional boundary (Rohde and Associates 2020). Table 4.15-1 identifies the location and types of fire resources available for response, based upon proximity to the project site.

**Table 4.15-1. Fire Protection Facilities in the Project Vicinity**

| Fire Station | Location | Resources | Distance | Service Provided |
|---|---|---|---|---|
| USFS, Descanso Ranger District Alpine | 3348 Alpine Blvd., Alpine | 1 Type-3 Eng<br>1 Chief Officer | 1.9 miles<br>4 minutes | Federal mission wildfire response only |
| Alpine Fire Protection District Station 17 | 1364 Tavern Rd., Alpine | 1 Type-1 Eng ALS<br>1 ALS Amb<br>1 Chief Officer, Reserve:<br>1 Type-1 Eng, 1 Type-3 Eng | 2.7 miles<br>5 minutes | All risk response |
| Viejas Indian Reservation Fire Department Station 25 | 1 Viejas Grade Rd., Alpine | 1 Type-1 Eng, 1 ALS Amb<br>Reserve: 1 Type-1 Eng, ALS<br>1 Type-3 Eng<br>1 Type-6 Eng, 1 Water Tender | 3.4 miles<br>6 minutes | All risk response |
| ~~San Diego~~ County ~~Fire Authority (SDCFA)~~FPD Station 24 | 551 Harbison Canyon Rd., El Cajon | 1 Type-1 Eng ALS | 6.3 miles<br>10 minutes | All risk response |
| Lakeside Fire Protection District Station 26 | 15245 Oak Creek Rd., El Cajon | 1 Type-1 Eng ALS | 7.6 miles<br>12 minutes | All risk response |
| CAL FIRE Station 21 | 9711 Flinn Springs Rd., El Cajon | 1 Type-3 Eng | 8.2 miles<br>13 minutes | All risk response – ~~s~~State wildfire mission |
| Lakeside Fire Protection District Station 3 | 15245 Oak Creek Rd., El Cajon | 1 Type-1 Eng ALS<br>1 ALS Amb | 10.0 miles<br>14 minutes | All risk response |
| ~~SDCFA~~County FPD Station 45 | 24592 Viejas Grade Rd., Descanso | 1 Type-1 Eng ALS<br>Reserve: 1 Type-6 | 11.2 miles<br>15 minutes | All risk response |
| USFS Descanso Station | 24321 Viejas Grade Rd. | 2 Type-3 Engines | 11.7 miles<br>15 minutes | Federal mission wildfire response only |
| Sycuan Indian Reservation Fire Department | 5449 Sycuan Rd., El Cajon | 1 Type-1 Eng ALS<br>1 Type-3 Eng,<br>1 Water Tender<br>1 ALS Amb, 1 Truck Company<br>1 Crew (Golden Eagles IHC) | 7.3 miles<br>14 minutes | All risk response |
| ~~SDCFA~~County FPD Station 44 | 28850 Old Hwy.80, Pine Valley | 1 Type-1 Engine<br>1 ALS Amb<br>1 Chief Officer Reserve: 1<br>Type-6 Eng, 1 Water Tender,<br>1 US&R Unit | 15.1 miles<br>16 minutes | All risk response |
| CAL FIRE Station 20 | 2249 Jamacha Rd., El Cajon | 2 Type-3 Engines<br>1 Bulldozer<br>Numerous Chief Officers | 15.3 miles<br>25 minutes | All risk response |
| Santee Fire Station 4 | 8950 Cottonwood Ave., Santee | *Nearest truck company | 18.7 miles<br>30 minutes | All risk response – nearest truck |

Source: Rohde and Associates 2020
ALS = Advanced Life Support; Amb = Ambulance; Eng = engine; US&R = Urban Search and Rescue

One indicator for determining adequate fire protection per demand is the ability to respond to every emergency within acceptable time parameters. Travel time is defined as the estimated time it will

take for responding emergency personnel to reach the farthest structure in a proposed development project. Travel time is determined by measuring the most direct reliable route with consideration given to safe operating speeds for heavy fire apparatus. Travel time does not include reflex or reaction time, or on-scene size-up and set-up prior to attacking the fire, ~~allof~~all of which are critical precursors of actual firefighting. If the appropriate emergency travel time cannot be met for a proposed project, the construction or expansion of new fire protection facilities may be necessary.

As shown in Table 4.15-2, adequate travel time standards for a Village land use is a maximum of 5 minutes; Semi-Rural land use is a maximum of 10 minutes; and Rural land use is a maximum of 20 minutes. This table reflects the information shown in the County ~~of San Diego~~ General Plan Table S-1, *Travel Time Standards from the Closest Fire Station*. Estimated travel time from Alpine Fire Protection District Station 17 to the project site is approximately 5 minutes.

**Table 4.15-2. Travel Time Standards for Fire Protection**

| Travel Time (minutes) | Regional Category (and/or Land Use Designation) | Purpose |
|---|---|---|
| 5 | • Village (VR-2 to VR-30) and limited Semi- Rural Residential Areas (SR-0.5 and SR-1)<br>• Commercial and Industrial Designations in the Village Category<br>• Development located within a Village Boundary | In general, this travel time standard applies to the county's more intensely developed areas, where resident and business expectations for service are the highest. |
| 10 | • Semi-Rural Residential Areas (> SR-1 and SR-2 and SR-4)<br>• Commercial and Industrial Designations in the Semi-Rural Category<br>• Development located within a Rural Village Boundary | In general, this travel time provides a moderate level of service in areas where lower-density development, longer access routes, and longer distances make it difficult to achieve shorter travel times. |
| 20 | • Limited Semi-Rural Residential Areas (>SR-4, SR-10) and Rural Lands (RL-20)<br>• All Commercial and Industrial Designations in the Rural Category | In general, this travel time is appropriate for very low-density residential areas, where full-time fire service is limited and where long access routes make it impossible to achieve shorter travel times. |
| >20 | • Very-low rural land densities (RL-40, RL-80) | Applications of very-low rural land densities mitigate the risk associated with wildfires by drastically reducing the number of people potentially exposed to this hazard. Future subdivisions at these densities are not required to meet a travel time standard. However, independent fire districts should impose additional mitigation requirements on development in these areas. |

Source: County of San Diego 2011b.

## Police Protection

The San Diego County Sheriff's Department (SDSD) serves the ~~community of Alpine.~~project site. This department has nearly 4,000 employees and covers approximately 4,200 square miles of ~~the county~~San Diego County, including many incorporated cities in addition to the unincorporated area~~s~~. SDSD facilities located in unincorporated areas provide general law enforcement patrol, crime investigation, and crime prevention services. To effectively serve this extensive geographic area, the SDSD Law Enforcement Services Bureau operations are organized under a system of command stations, substations, offices, and storefronts (County of San Diego 2011a). The nearest sheriff station is the Alpine Substation, located approximately 1 mile northeast of the project site at 2751 Alpine Boulevard, Alpine, CA 91901. The 2008 SDSD average response time for the Alpine Substation was 15 minutes for priority calls and 30 minutes for non-priority calls.

A call for service is registered when a citizen or law enforcement officer requests assistance for public safety services. Examples of calls for service include crimes reported by the public such as burglaries, assaults, and thefts. Calls are assigned a priority based on the nature of the incident and the level of urgency. Priority 1 is considered the highest priority and includes officer assistance and/or vehicular pursuit calls. Priority 2 calls include injured persons, robbery in progress, bomb threats, carjacking, rape, and stolen vehicles. Priority 3 calls include assaults, prowlers, disturbances, tampering with vehicles, and burglary alarms. Finally, Priority 4 calls are the lowest level calls and include security checks, animal noise disturbances, traffic stops, harassing phone calls, illegal dumping, and abandoned vehicles. Travel times are used as guidelines to measure adequate levels of service.

## Schools

Public schools and educational facilities are mandated by the California Department of Education and administered by the San Diego County Board of Education and the San Diego County Office of Education. The project area is located within the service boundary of the Alpine Union School District for elementary school students and within the boundaries of the Grossmont Union High School District for high school students. Joan MacQueen Middle School is located approximately 0.4 mile west of the project site at 2001 Tavern Road, Alpine, CA 91901.

## Parks

As discussed in Section 4.16, *Recreation*, the project area contains several recreational facilities including parks, trails, preserves, and other amenities that provide valuable recreational opportunities to the community while preserving natural and cultural resources. ~~The~~ County DPR operates several trails within the community. Table 4.15-3 shows parks and recreational facilities within and in the vicinity of the project site. Figure 4.16-1 shows the location of the existing local parks in relation to the project area.

**Table 4.15-3. Parks and Recreational Facilities in the Project Vicinity**

| Park/Facility Name | Park Type | Existing Acreage |
|---|---|---|
| Boulder Oaks Neighborhood Park*1 | Local Park | 2 |
| Joan MacQueen Middle School*1 | ~~JEPA~~Local Park | 12 |
| Shadow Hill Elementary School*1 | ~~JEPA~~Local Park | 12 |

| Park/Facility Name | Park Type | Existing Acreage |
|---|---|---|
| Wright's Field | ~~Neighborhood Park~~Preserve | 202 |
| Cleveland National Forest | ~~Regional Park~~Preserve | 28,020 |
| **Total** | **28,248** | |

~~JEPA = joint exercise of powers~~
[1] Indicates that the park is in a Joint Exercise of Powers Agreement (JEPA), which means that the owner of the facility agrees to allow limited use of the facility by another entity, in this case the County and its residents.

The County ~~of San Diego~~ has a goal of 10 acres of local parks and15 acres of regional parks provided for every 1,000 persons in the unincorporated ~~county~~area (County of San Diego 2011b).

# 4.15.3 Applicable Laws and Regulations

## 4.15.3.1 Federal

There are no applicable federal regulations.

## 4.15.3.2 State

### California Health and Safety Code (Section 13000 et seq.)

State fire regulations are set forth in Section 13000 et seq. of the California Health and Safety Code, which include regulations concerning building standards (as also set forth in the California Building Code), fire protection and notification systems, fire protection devices such as extinguishers and smoke alarms, high-rise building and childcare facility standards, and fire suppression training. The State Fire Marshal enforces these regulations and building standards in all ~~s~~State-owned buildings, ~~s~~State-occupied buildings, and ~~s~~State institutions throughout California.

### California Public Resources Code Sections 4201–4204

This section of the PRC was amended in 1982 to require the California Department of Forestry to classify all SRAs into fire hazard severity zones. The purpose of this code is to provide classification of lands within SRAs in accordance with the severity of fire hazard present for the purpose of identifying measures to be taken to retard the rate of spreading and to reduce the potential intensity of uncontrolled fires that threaten to destroy resources, life or property.

### State Responsibility Areas Fire Regulations (Title 14 Natural Resources, Department of Forestry Fire Protection)

These regulations constitute the basic wildland fire protection standards of the California Board of Forestry. They have been prepared and adopted for the purpose of establishing minimum wildfire protection standards in conjunction with building, construction, and development in SRAs. Title 14 regulates that the future design and construction of structures, subdivisions, and developments in an SRA shall provide for basic emergency access and perimeter wildfire protection measures.

### California Code of Regulations Title 24, Parts 2 and 9, California Building Code

Part 2 of CCR Title 24 refers to the regulations and general construction building standards of ~~s~~State adopting agencies, including administrative, fire and life safety, and field inspection provisions. Part 2 is preassembled with the 2015 International Building Code with necessary California amendments. Part 9 refers to the California Fire Code, which contains fire safety-related building standards referenced in other parts of Title 24. The California Fire Code is preassembled with the 2015 Edition of the International Fire Code with necessary California amendments.

## 4.15.3.3 Local

### County of San Diego Consolidated Fire Code

California Health and Safety Code Section 13869.7(a) provides that a fire protection district organized pursuant to Division 12 of the code may adopt building standards relating to fire and panic safety that are more stringent than the building standard adopted by the State Fire Marshal and contained in California Building Code standards. Section 13869.7(c) requires a fire protection district to transmit its adopted ordinance to the county where the ordinance will apply and allows the legislative body of a county to ratify, modify or deny an adopted fire protection district ordinance. The fire protection districts within the boundaries of San Diego County have collaborated to adopt the 2016 California Fire Code. The 2017 Consolidated Fire Code is based upon the County's 2017 Fire Code as currently amended and adopted in Title 9, Division 6, Chapter 1 of the County Code, subject to the modifications of each fire protection district to the California Building Code standards based upon their respective determinations as to what modifications are reasonably necessary because of local climatic, geological, and topographical conditions within the district.

### County of San Diego General Plan ~~Update~~ Policies

The following goals and policies from the General Plan are applicable to public services:

#### Land Use Element

**Policy LU-9.4: Infrastructure Serving Villages and Community Cores.** Prioritize infrastructure improvements and the provision of public facilities for Villages and community cores and sized for the intensity of development allowed by the Land Use Map.

**Policy LU-12.3: Infrastructure and Services Compatibility.** Provide public facilities and services that are sensitive to the environment with characteristics of the unincorporated communities. Encourage the collocation of infrastructure facilities, where appropriate.

**Policy LU-12.4: Planning for Compatibility.** Plan and site infrastructure for public utilities and public facilities in a manner compatible with community character, minimize visual and environmental impacts, and whenever feasible, locate any facilities and supporting infrastructure outside preserve areas. Require context sensitive Mobility Element road design that is compatible with community character and minimizes visual and environmental impacts.

**Policy LU-18.1: Compatibility of Civic Uses with Community Character.** Locate and design Civic uses and services to assure compatibility with the character of the community and adjoining uses, which pose limited adverse effects. Such uses may include libraries, meeting centers, and small swap meets, farmers markets, or other community gatherings.

**Policy LU-18.2: Co-Location of Civic Uses.** Encourage the co-location of civic uses such as County library facilities, community centers, parks, and schools. To encourage access by all segments of the population, civic uses should be accessible by transit whenever possible.

**Safety Element**

**Policy S-3.4: Service Availability.** Plan for development where fire and emergency services are available or planned.

**Policy S-5.1: Regional Coordination Support.** Advocate and support regional coordination among fire protection and emergency service providers.

**Policy S-5.2: Fire Service Provider Agreements.** Encourage agreements between fire service providers to improve fire protection and to maximize service levels in a fair, efficient, and cost-effective manner.

**Policy S-6.1: Water Supply.** Ensure that water supply systems for development are adequate to combat structural and wildland fires.

~~**Policy S-6.2: Fire Protection for Multi-Story Development.** Coordinate with fire services providers to improve fire protection services for multi-story construction.~~

**Policy S-6.3: Funding Fire Protection Services.** Require development to contribute its fair share towards funding the provision of appropriate fire and emergency medical services as determined necessary to adequately serve the project.

**Policy S-6.4: Fire Protection Services for Development.** Require that development demonstrate that fire services can be provided that meet the minimum travel times identified in Table S-1 (Travel Time Standards).

**Policy S-6.5: Concurrency of Fire Protection Services.** Ensure that fire protection staffing, facilities and equipment required to serve development are operating prior to, or in conjunction with, the development. Allow incremental growth to occur until a new facility can be supported by development.

**Policy S-14.1: Vehicular Access to Development.** Require development to provide vehicular connections that reduce response times and facilitate access for law enforcement personnel, whenever feasible.

# 4.15.4 Project Impact Analysis

## 4.15.4.1 Methodology

The project would develop an active park and associated trails, and conserve approximately 70 acres of open space~~/preserve~~. The following section evaluates the impacts of the project with respect to public services. Based on the existing conditions, the analysis assesses the direct and indirect impacts related to public services using the thresholds presented below.

# 4.15.4.2 Thresholds of Significance

## Appendix G of the ~~State~~ CEQA Guidelines

Based on guidance provided in Appendix G of the ~~State~~ CEQA Guidelines, the project would result in a significant impact if the following would be true.

(a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

1. Fire protection
2. Police protection
3. Parks
4. Schools or other public facilities

## County of San Diego Guidelines for Determining Significance

The County ~~of San Diego~~ does not have specific guidelines for determining significance for public services impacts.

# 4.15.4.3 Project Impacts and Mitigation Measures

***Threshold 1: The project <u>would not</u> result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection.***

## County Park ~~and~~<u>,</u> Trails<u>,</u> and Open Space ~~/Preserve~~

### Impact Discussion

Construction activities, including staging areas for construction equipment and parking for construction workers, would be located within the project site. Construction of the project would occur from ~~the Fall 2022 to Spring~~spring 2024 <u>to summer 2025</u>. Because construction activities would occur only within the project site, they are not anticipated to disrupt existing fire protection services or affect response times. The presence of construction workers is also not expected to result in substantially increased demand for fire protection services and the existing fire operations would be able to accommodate the construction activities of the project.

As shown in Table 4.15-2, the adequate ~~fire or police response~~ travel time standard for a Semi-Rural land use is a maximum of 10 minutes. Estimated travel time from Alpine Fire Protection District

Station 17 and Alpine Fire Station 48 to the project site is approximately 5 minutes~~; therefore no impact would occur. [What about police?].~~

The project would be constructed in accordance with current building and safety ordinances and codes, including all applicable County codes related to construction, access, water mains, fire flows, and hydrants. The project would comply with the California State Fire and Building Code, which regulates minimum fire safety requirements for new and existing buildings, facilities, storage, and processes. The project would also comply with the County ~~of San Diego~~ Consolidated Fire Code, which guides fire protection standards within ~~the county~~San Diego County.

Fire services are based on the communities' needs as local departments conduct ongoing evaluations, as well as annual budgeting processes. If ongoing evaluations indicate increased response times, then the acquisition of equipment, personnel, and new stations would be considered. Implementation of the project would attract additional visitors, which may result in additional demand for fire protection services. Operation of the project would be expected to serve ~~regional~~local residents and occasional visitors, and is anticipated to have an average daily use of 500 people. An increase in occasional visitors during special events, which require permits, could result in an increased demand on fire protection services because a higher density of visitors to the area could result in more incidents requiring intervention. However, park users would usually be dispersed throughout the day and would not be expected to materially affect service ratios for fire protection. Large events would result in a higher density of regional residents and visitors and, therefore, could increase the demand for fire protection services. These large, special events would require a Special Events Permit and coordination with additional emergency service departments. As discussed in Section 4.9, *Hazards and Hazardous Materials*, the County ~~of San Diego~~ Office of Emergency Services (OES) coordinates the overall County response to disasters. With buildout of the project, events that require emergency services planning would continue to be coordinated with this agency to establish safety protocols. Furthermore, fire protection service staffing ratios are based on a per-1,000-permanent-residents ratio, and the increase in ~~regional~~local residents and visitors to the new amenities at the project site would not be expected to affect that ratio. Furthermore, the Fire and Emergency Operational Assessment prepared for the project determined that development of the project would not present unmitigable impacts or a significant increase in call volume for local emergency services and may be developed without adding to existing regional fire resources or establishing new or unreasonable wildfire risks (Rohde and Associates 2020). Accordingly, it is not expected that operation of the project would require new or physically altered government facilities in order to maintain acceptable service ratios for fire protection services, the construction of which could cause significant environmental impacts.

## Impact Determination

Impacts would be less than significant.

## Mitigation Measures

No mitigation is required.

## Level of Significance after Mitigation

Impacts would be less than significant.

***Threshold 2: The project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for police protection.***

## County Park ~~and~~, Trails, and Open Space ~~/Preserve~~

### Impact Discussion

As discussed above, construction activities would be contained within the boundaries of the project site. SDSD staffing goals and facility plans are based upon population; generally, SDSD has a goal of providing one patrol position per 10,000 residents. Travel time standards are typically applied in a facility-based model where the emergency services always start at a defined point (i.e., a police station). SDSD does not have adopted travel time standards because deputies respond to calls for service while they are already out on patrol and the travel time will vary depending several factors, such as the deputy's current location, their availability (e.g., they may already be working on a higher priority call), and the type of call (e.g., a priority call may be a "cover call" requiring that two deputies respond and the call would not be dispatched until two deputies are available) (County 2011a).

The project would be constructed in accordance with current building and safety ordinances and codes, including all applicable County code related to construction and access. The project would comply with the California State Fire and Building Code, which regulates minimum fire safety requirements for new and existing buildings, facilities, storage, and processes. Additionally, proposed development would be generally consistent with current uses.

Police services are based on the communities' needs as local departments conduct ongoing evaluations, as well as annual budgeting processes. If ongoing evaluations indicate increased response time, then the acquisition of equipment, personnel, and new stations would be considered. The project could attract ~~regional~~local residents and occasional visitors, which may result in additional demand for police protection services, and is anticipated to have an average daily use of 500 people. An increase in ~~regional~~local residents and visitors could result in an increased demand on police protection services because a higher density of people to the area could result in more incidents requiring police intervention. However, ~~regional~~local residents and visitors would usually be dispersed throughout the day and would not be expected to materially affect service ratios for police protection. Large events would result in a higher density of people and, therefore, could increase the demand for police services~~.~~ as stated above. As discussed in Section 4.9, the County OES coordinates the overall County response to disasters. With buildout of the project, events that require police and emergency services planning would continue to be coordinated with this agency to establish safety protocols. Furthermore, SDSD has a goal of providing one patrol position per 10,000 permanent residents, and the increase in ~~regional~~local residents and visitors to the new amenities at the project site would not be expected to be substantial enough to affect that ratio. Accordingly, it is not expected that operation of the project would require new or physically altered government facilities in order to maintain acceptable service ratios for police protection services, the construction of which could cause significant environmental impacts.

### Impact Determination

Impacts would be less than significant.

### Mitigation Measures

No mitigation is required.

### Level of Significance after Mitigation

Impacts would be less than significant.

***Threshold 3: The project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for parks.***

## County Park ~~and~~, Trails, and Open Space ~~/Preserve~~

### Impact Discussion

The project does not include residential development and would not introduce a substantial permanent population at the project site. Construction workers are anticipated to come from the existing pool of workers in the local region. During operation, most of the visitors to the project site would be existing residents, not new residents to the area. The County ~~of San Diego~~ has a goal of 10 acres of local parks and15 acres of regional parks provided for every 1,000 persons in the unincorporated ~~county~~area (County of San Diego 2011b). During construction, there may be temporary loss of access to portions of the project site. However, this temporary loss of access to parkland would not be expected to materially affect the County performance ratio for parks. Furthermore, during operation, the project would provide parkland and maintain existing trails. Therefore, implementation of the project would not result in a need for new or physically altered governmental facilities to maintain acceptable service ratios, response times, or other performance objectives for parks.

### Impact Determination

Impacts would be less than significant.

### Mitigation Measures

No mitigation is required.

### Level of Significance after Mitigation

Impacts would be less than significant.

***Threshold 4: The project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for schools or other facilities.***

### County Park ~~and~~, Trails, and Open Space ~~/Preserve~~

#### Impact Discussion

The project does not include residential development and would not introduce a substantial permanent population at the project site. Construction workers are anticipated to come from the existing pool of workers in the local region. During operation, most of the visitors to the project site would be existing residents, not new residents to the area. Therefore, implementation of the project would not result in a need for new or physically altered governmental facilities to maintain acceptable service ratios, response times, or other performance objectives for schools or other facilities.

#### Impact Determination

Impacts would be less than significant.

#### Mitigation Measures

No mitigation is required.

#### Level of Significance after Mitigation

Impacts would be less than significant.

## 4.15.5 Summary of Significant Impacts

There would be no significant impacts related to public services.

# 4.16.1 Overview

This section describes the existing recreational facilities that could be adversely affected by the project and the applicable laws and regulations related to recreational facilities. The section concludes with an analysis of the project's effects associated with park facilities, existing recreational amenities, and new or expanded recreational facilities.

# 4.16.2 Existing Conditions

The project area contains several recreational facilities including parks, trails, preserves, reservoirs, and other amenities that provide valuable recreational opportunities to the local community while preserving the natural and cultural resources within it. County DPR operates several trails within the community of Alpine. This section describes the recreational facilities within the project area.

~~**Table 4.16-1. Parks and Recreational Facilities within the Project Area**~~

| ~~Park/Facility Name~~ | ~~Park Type~~ | ~~Existing Acreage~~ |
|---|---|---|
| ~~Boulder Oaks Neighborhood Park[1]~~ | ~~Local Park~~ | ~~2~~ |
| ~~Joan MacQueen Middle School[1]~~ | ~~JEPA~~ | ~~12~~ |
| ~~Shadow Hill Elementary School[1]~~ | ~~JEPA~~ | ~~12~~ |
| ~~Wright's Field~~ | ~~Neighborhood Park~~ | ~~202~~ |
| ~~Cleveland National Forest~~ | ~~Regional Park~~ | ~~28,020~~ |
| ~~**Total**~~ | | ~~**28,248**~~ |

~~[1] Indicates that the park is in a Joint Exercise of Powers Agreement (JEPA), which means that the owner of the facility agrees to allow limited use of the facility by another entity, in this case the County of San Diego and its residents.~~

The project area has several trails that provide accessibility and connectivity to the scenic and recreational facilities in the area. The system of interconnected regional and community trails and pathways within the Community of Alpine is developed and managed by the County ~~of San Diego~~ according to the County Trails Program and the Community Trails Master Plan, but these trails may be developed on public, semi-public, or private lands (County of San Diego 2005).

Several parks in the project area are not owned by the County ~~of San Diego~~ but are available to nearby residents during designated hours. Parks range in acreage depending on the communities they serve and the uses they permit. The parks may be joint-use facilities such as schools, community centers, athletic fields, and other recreational facilities. Boulder Oaks Neighborhood Park (2 acres), approximately 0.65 mile west of the project site and owned by the Alpine Union School District (AUSD), is available to the residents of ~~the county~~San Diego County during limited hours because of a Joint Exercise of Powers Agreement (JEPA) between AUSD and the County ~~of San Diego.~~. Boulder Oaks Neighborhood Park includes playground equipment and picnic tables. AUSD and the County ~~of San Diego~~ also have a JEPA for Joan MacQueen Middle School (12 acres)

approximately 0.40 mile northwest of the project site and Shadow Hills Elementary School (12 acres) approximately 3 miles northwest of the project site, which have athletic fields that are available for public use outside of the operational hours of the schools. Figure 4.16-1 shows the locations of the existing local parks in relation to the project area.

Wright's Field, a preserve, is adjacent to the project site. The purpose of preserves is to maintain community character and protect biological, cultural, and historical resources while making these resources available for limited public recreational opportunities. Some preserves may also provide interpretive and educational amenities, although public access may be limited according to the sensitivity of the resources. Wright's Field is owned and managed by the Back Country Land Trust.

The Cleveland National Forest is the southernmost National Forest in California consisting of a total of 460,000 acres in Southern California. The forest offers a wide variety of terrains and recreational opportunities including camping, hunting, mountain biking, hiking, all-terrain vehicle riding, and target shooting. Approximately 28,248 acres are in proximity to the project.

**Table 4.16-1. Parks and Recreational Facilities within the Project Area**

| Park/Facility Name | Park Type | Existing Acreage |
|---|---|---|
| Boulder Oaks Neighborhood Park[1] | Local Park | 2 |
| Joan MacQueen Middle School[1] | Local Park | 12 |
| Shadow Hill Elementary School[1] | Local Park | 12 |
| Wright's Field | Preserve | 202 |
| Cleveland National Forest | Preserve | 28,020 |
| **Total** | | **28,248** |

[1] Indicates that the park is in a Joint Exercise of Powers Agreement (JEPA), which means that the owner of the facility agrees to allow limited use of the facility by another entity, in this case the County and its residents.

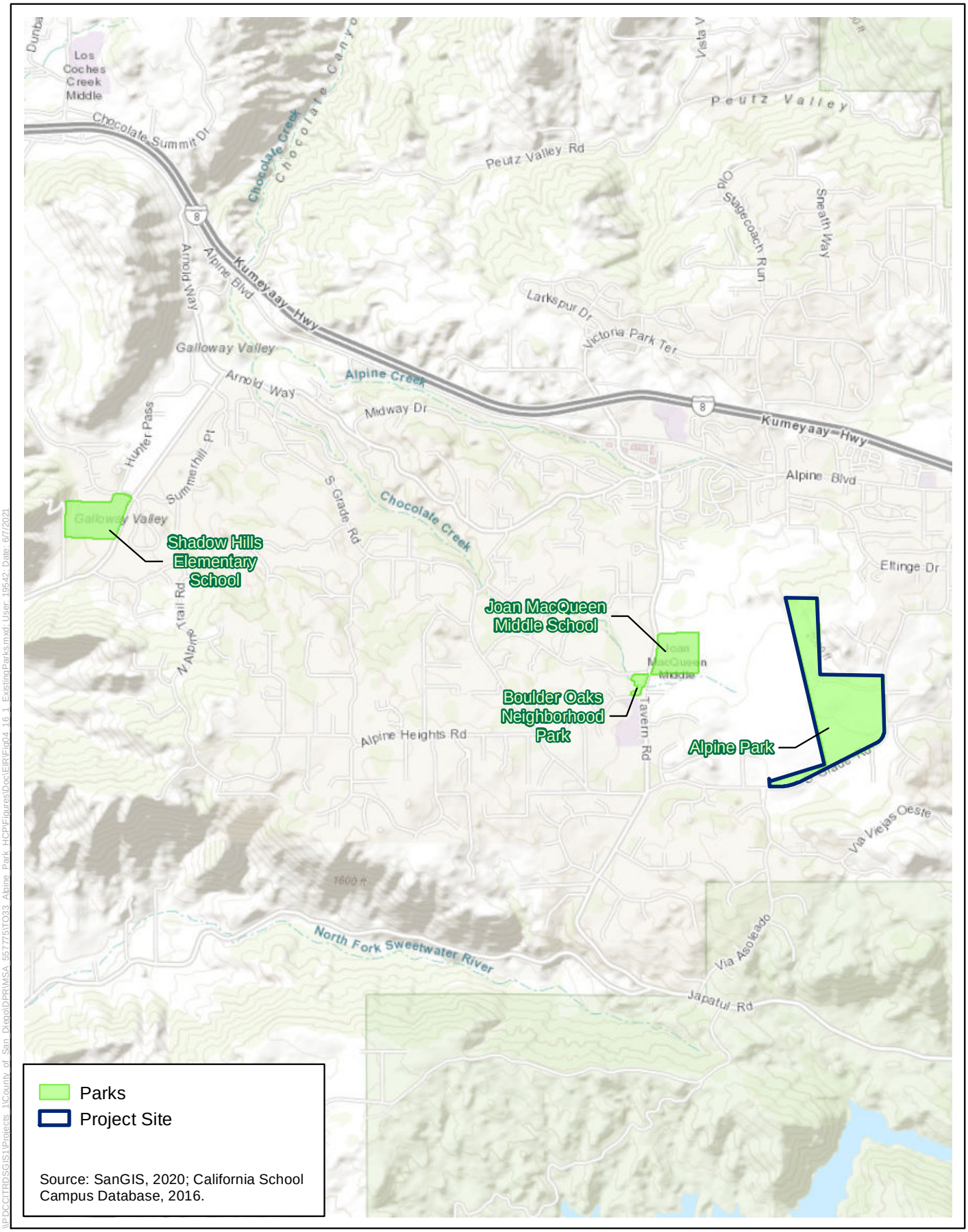



**Figure 4.16-1**
**Existing Parks**
**Alpine Park Project**

### 4.16.2.1 County of San Diego

The *San Diego County General Plan* identifies goals and policies for meeting the recreational needs of local communities. To evaluate the recreational need of the ~~c~~County's communities, the County Park Lands Dedication Ordinance (PLDO) divided San Diego County into 24 Local Park Planning Areas (LPPAs) to coincide generally with the community plan boundaries outlined in the ~~general plan~~General Plan. Within each LPPA, the ratio of local or regional parkland per 1,000 residents is calculated to determine whether a community has enough acreage of parkland and recreational facilities. The advantage of this evaluation is that it may be used to allocate funding for the focused development of recreational facilities in underserved communities.

According to the *County of San Diego Parks Master Plan* (PMP), the County's minimum level of service standard for local parks is 3 acres per 1,000 residents, and 10 acres per 1,000 residents for regional parks (County of San Diego 2016). However, the goal identified in the 2011 *San Diego County General Plan* is 10 acres per 1,000 residents for local parks and 15 acres per 1,000 residents for regional parks (County of San Diego 2011a). The PMP minimum standard is an analytical tool for County DPR to determine where parks and recreational resources are needed, whereas the 2011 ~~general plan~~General Plan establishes a goal for long-term park and recreational development. As of 2019, the Alpine Community Plan Area (CPA) has approximately 1.44 acres of local parkland per 1,000 residents, and no regional parkland. These totals do not include parks that are not owned by the County or for which there is no JEPA because, although they may meet some of the recreational needs of particular communities, access and use may be restricted.

The PLDO authorizes ~~local jurisdictions~~the County to require developers to pay in-lieu fees for local park development or dedicate parkland up to 3 acres per 1,000 residents. Additional funding may be available for park development through the California State Parks Office of Grants and Local Services. State grants may be allocated to specific projects and are offered through state programs with defined goals such as habitat conservation. National Resource Assistance Grants aimed toward promoting conservation and restoring natural and cultural resources are also made available through the U.S. Fish and Wildlife Service. State and federal grants are the most important funding source for the acquisition and development of parkland (County of San Diego 2011b).

The County also participates in JEPAs and other agreements with public and private entities to develop and maintain recreational facilities on non-County lands. The California Association of Joint Powers Authorities defines JEPAs or Joint Powers Authorities as the joining together of two or more public agencies to provide more effective or efficient government services or to solve a service delivery system (CAJPA n.d.). This may consist of cooperatively managing a service or permitting shared use of the service. For example, the County ~~of San Diego~~ participates in a JEPA with AUSD wherein the community of Alpine and the County ~~of San Diego~~ are allowed limited use of the athletic fields and recreational facilities at Shadow Hills Elementary, Joan MacQueen Middle School, and Boulder Oaks Neighborhood Park, which are owned by AUSD.

# 4.16.3 Applicable Laws and Regulations

## 4.16.3.1 Federal

### National Trails System Act of 1968 (Public Law 90-543)

The National Trails System Act of 1968 instituted a nationwide system of interstate riding and hiking trails. This act reflects the federal government's goals of preserving and developing new riding and hiking trails and aims to protect existing trails and provide for new trails and related facilities.

## 4.16.3.2 State

### Senate Bill 1685

Senate Bill 1685 authorizes open space districts to levy special assessments for open space purposes. The enabling legislation for regional open space districts is in the California Public Resources Code commencing with Section 5500 and in the Government Code commencing with Section 56000. Pursuant to ~~this code~~these codes, regional park and open space districts are formed when three or more jurisdictions, together with any parcel of city or county territory, ~~o rganize~~organize a contiguous area with the intent for the designated space to serve the park and recreational needs ~~in San Diego County.~~ Senate Bill 1685 is the same authority as that for regional park districts and open space districts.

## 4.16.3.3 Local

### County of San Diego Parks Master Plan

The County's PMP serves as a guidance document for the acquisition and development of future parks and recreation facilities in the unincorporated ~~county~~area. The purpose of the PMP is to document current conditions and analyze park shortages and distribution inequities in a way that is consistent with County- and County DPR-approved plans, policies, and ordinances. Because the PMP identifies distribution inequalities and targets areas for future development and acquisition, the PMP is an important budgeting tool for County DPR. The PMP also recommends ways that future park projects may be incorporated into the capital improvement budget process and identifies other sources of revenue that can be used to fund future park improvement and development. The PMP is intended to assist in the development of projects and programs that will be supported by the community and lead to improvements within the County's Park and Recreation system.

The PMP found the Alpine CPA, where the project site is located, to have a deficit of local parkland but much capacity for park acquisition and development. The PMP found Alpine to have sufficient regional parkland because of the distances to regional parks surrounding the Alpine CPA, but there are no regional parks within the Alpine CPA boundary. Because the population is expected to increase, the PMP recommended the development of additional running, fishing, road biking, mountain biking, camping, and hiking facilities and the intensification of recreational services in the central Alpine area where population is expected to increase most. The PMP also identified 70 vacant parcels totaling 219 acres, which may be suitable for park development were they to be

acquired. Overall, the PMP determined that park acquisition is the greatest priority for County DPR in the Alpine CPA.

### County Park Lands Dedication Ordinance

On July 25, 2018, the Board of Supervisors adopted a comprehensive update of the PLDO. The PLDO requires dedication of parks, payment of park impact fees, or a combination of both for residential development projects. For residential subdivisions and condominiums with 50 or more dwelling units, the County may require dedication of parkland. Payment of park impact fees are required for all other residential development projects.

The PLDO separates the unincorporated ~~portions of the county~~area into 24 LPPAs, which are used to determine the amount of parkland to be dedicated or the in-lieu fees to be paid for residential development projects subject to the PLDO. The PLDO requires that developers dedicate parkland to meet the level of service standard of 3 acres per 1,000 residents for all new residential development. The in-lieu fee is calculated based on the number of dwelling units and includes the cost of acquiring and developing future park and recreation facilities to meet the level of service standard. All fees collected in an LPPA must be spent in that park planning area (County DPR 2019).

Existing sources of funding for park acquisition, development, operation, and maintenance include the following: the County's PLDO; local, state, and federal funds; donations; and Joint Powers Authorities. PLDO funds are specifically for local parkland dedication or active recreation facilities but may be used for local-serving, active recreation in regional parks.

# 4.16.4 Project Impact Analysis

## 4.16.4.1 Methodology

This section analyzes the project's impacts on recreational facilities by determining if the project has the potential to accelerate the physical deterioration of existing recreational facilities. In addition, recreational impacts may occur if the project would implement recreational amenities that would directly result in a physical impact on the environment. The analysis determines if the physical construction would result in a significant impact on the environment and if mitigation is necessary.

## 4.16.4.2 Thresholds of Significance

### Appendix G of the ~~State~~ CEQA Guidelines

The following significance criteria are based on Appendix G of the ~~State~~ CEQA Guidelines and the ~~County of San Diego's~~County's CEQA Significance Determination Thresholds and provide the basis for determining significance of impacts associated with recreation resulting from the project. The determination of whether an impact on recreational facilities would be significant is based on the applicable recreation thresholds and the professional judgment of County DPR as lead agency supported by the evidence in the administrative record.

Impacts are considered significant if the project would result in any of the following:

1. Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.
2. Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

### County of San Diego Guidelines for Determining Significance

The County ~~of San Diego~~ does not have specific guidelines for determining significance for recreation impacts.

## 4.16.4.3 Project Impacts and Mitigation Measures

***Threshold 1: Implementation of the project would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.***

### County Park and Trails

#### Impact Discussion

##### Construction

Construction activities would bring construction workers to the project site; however, it is not expected that they would use existing neighborhood or regional parks or other recreational facilities to such a degree and for such a duration of time that there would be a substantial physical deterioration of the existing facilities. Furthermore, construction activities would be temporary. As a result, project construction would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of these facilities would occur or be accelerated.

##### Operation

The project includes the development of an active park and trails that would provide recreational opportunities for the local community of Alpine. The project would result in increased visitors to the project site, which is currently closed to the public. Operation of the proposed 25-acre active park and 1 acre of trails would accommodate visitors because recreational opportunities would be expanded beyond existing recreational facilities within the project area. The community of Alpine is currently deficient in park space and the project would increase the available recreational acreage for the ~~surrounding~~local community. The project would open a new recreational facility to the public, which would reduce the demand on other similar recreational facilities in the ~~region~~community. As a result, although operation of the project would increase the use of the existing passive recreational facilities, the project would not increase their use in such a way that substantial physical deterioration of these facilities would occur or be accelerated.

### Impact Determination

Implementation of the project would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. Impacts would be less than significant.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

Impacts would be less than significant.

## Open Space~~/Preserve~~

### Impact Discussion

The open space~~/preserve~~ area would allow for continued use of existing trails within the approximately 70-acre area during operation. As a result, the proposed open space~~/preserve~~ component would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated.

### Impact Determination

Implementation of the open space~~/preserve~~ component of the project would not increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. Impacts would be less than significant.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

Impacts would be less than significant.

***Threshold 2: Implementation of the project would not include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.***

## County Park and Trails

### Impact Discussion

#### Construction

As discussed throughout this Final EIR, construction of the project could result in potential physical impacts associated with construction activities. Mitigation measures have been identified for significant impacts associated with the construction of the active park that would be developed under the project. To the extent feasible, the identified mitigation measures would reduce impacts to less-than-significant levels. Construction of the active park and trails component would not result in any additional significant impacts beyond those already identified throughout this Final EIR.

#### Operation

The project would increase the available recreational facility acreage in the Alpine community by approximately 25 acres of active park and approximately 1 acre of trails. Although visitors to the project area would increase as a result of the project, the active park and trails would serve visitors during operations. Therefore, implementation of the project would not result in substantial adverse physical impacts associated with the construction of recreational facilities.

### Impact Determination

Implementation of the project would include recreational facilities or require the construction or expansion of recreational facilities. However, no impacts beyond those identified throughout this Final EIR were identified. Impacts would be less than significant.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

Impacts would be less than significant.

## Open Space~~/Preserve~~

### Impact Discussion

As discussed throughout this Final EIR, construction and operation of the open space~~/preserve~~ component of the project could result in potential physical impacts associated with construction of the recreational facility. Mitigation measures have been identified for significant impacts associated with construction activities. To the extent feasible, the identified mitigation measures would reduce impacts to less-than-significant levels. Construction of the open space~~/preserve~~ component would be minimal and would not result in any additional significant impacts beyond those already identified throughout this Final EIR.

### Impact Determination

Implementation of the project would include recreational facilities or require the construction or expansion of recreational facilities. However, no impacts beyond those identified throughout this Final EIR were identified. Impacts would be less than significant.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

Impacts would be less than significant.

## 4.16.5 Summary of Significant Impacts

There would be no significant impacts associated with recreation and no mitigation is required.

Section 4.17
# Transportation and Circulation

## 4.17.1 Overview

This section describes the existing conditions and laws and regulations related to transportation, circulation, and mobility, followed by an analysis of the project's potential to impact these facilities.

The information provided in this section is summarized from the *Alpine Community Park – VMT Analysis* prepared by Chen Ryan Associates in ~~August~~September 2020 (Appendix H) and the *Alpine Park Transportation Impact Study* (TIS) prepared by Chen Ryan Associates in ~~April~~July 2020 (Appendix I).

## 4.17.2 Existing Conditions

This section describes the regional and local roadways, public transit systems, and bicycle/ pedestrian facilities in the project site vicinity.

### 4.17.2.1 Existing Transportation Conditions

#### Regional Facilities

Regional access to the project site is provided by the interstate and ~~s~~State freeway systems, which are both under the California Department of Transportation's (Caltrans') jurisdiction. The following freeways provide access to the vicinity of the project site.

- Interstate (I-) 8 provides regional transit in an east-to-west route that extends from the western coast of San Diego to Casa Grande in central-southern Arizona. I-8 travels through the northern portion of the Alpine Community Plan Area, and through the most densely developed portion of the community. I-8 is approximately one mile north of the project site. ~~Access to/from Alpine from I-8 is provided from the Victoria Park Terrace/Alpine Blvd. interchange to the west and to/from the Willows Rd./Alpine Blvd. Interchange to the east.~~
- State Route (SR-) 79 provides regional access in San Diego and Riverside Counties in a north-to-south route from the I-8 ~~-~~just east of Alpine to Beaumont, in Riverside County. SR-79 is approximately 7.8 miles to the northeast of the project site.

#### Local Facilities

##### Roadways

There are two main roadways in the project vicinity, that provide access to the project site.

- South Grade Road creates a ~~circuitous~~ loop around the project site, traveling ~~south~~ from ~~its intersection with Alpine Blvd. in~~ the northwest portion of Alpine to the south, and then back to

the north ~~in~~on the eastern portion of the Alpine community~~, connecting again with Alpine Blvd.~~. South Grade Road borders the southern and eastern portions of the project site and provides access to the project site.

- Tavern Road is a main north-to-south roadway that traverses through the community of Alpine and ~~also~~ provides access to the project area. Tavern Road is approximately 0.90 miles to the west of the project site.

### Public Transportation Services

Regional public transportation serving the Alpine Community Plan Area includes bus services provided by the San Diego Metropolitan Transit System (MTS). Bus routes 838 and 888 serve Alpine by way of stops along Alpine Boulevard, Tavern Road, and Arnold Way. The closest bus stop is approximately 0.88 miles north of the project site~~, at ??.~~.

#### Pedestrian and Bicycle Facilities

Bicycle facilities are categorized as Class I, II, and III facilities. Class I facilities are off-street, paved bike paths; Class II facilities are bike lanes that are generally identified as a separate lane of a roadway; and Class III facilities are bike routes that are shared with vehicles along a roadway. There are limited bicycle facilities in the project vicinity; Alpine Boulevard has ~~a~~ Class III bike route from its intersection with Tavern Road to its intersection with Honey Hill Ranch Road~~, which is approximately 1/8 mile to the east of South Grade Rd.~~. There are no bike facilities along South Grade Road adjacent to the project site. All County of San Diego roadways (excluding freeways, except where allowed by Caltrans) are open for travel by bicycle, regardless of bikeway treatment.

# 4.17.3 Applicable Laws and Regulations

## 4.17.3.1 State

### Senate Bill 743

Governor Jerry Brown signed Senate Bill (SB) 743 on September 27, 2013, which mandated a change in the way that public agencies evaluate transportation impacts of projects under CEQA, focusing on vehicle miles traveled (VMT)), rather than level of service (LOS) and other delay-based metrics. SB 743 states that new methodologies under CEQA ~~must be used to evaluate~~are needed for evaluating transportation impacts that are ~~targeted at reducing~~better able to reduce GHG emissions and traffic-related air pollution, promoting the development of a multimodal transportation system, and providing clean, efficient access to destinations. It further intended to balance the need for LOS standards with the ~~s~~State's need to build infill housing and mixed-use commercial developments within walking distance of mass transit facilities and downtowns or town centers. SB 743 allow~~s~~ed for measurements of transportation impacts that ~~can~~could include VMT, VMT per capita, automobile trip generation rates, or automobile trips generated. Accordingly, SB 743 required the Governor's Office of Planning and Research (OPR) to amend the ~~State~~ CEQA Guidelines to reflect these changes.

### ~~State~~ CEQA Guidelines Section 15064.3

In response to SB 743, the Office of Planning and Research added Section 15064.3 of the ~~State~~ CEQA Guidelines, as part of a comprehensive Guidelines update, adopted by the California Natural Resources Agency in December 2018. Section 15064.3 describes specific considerations for evaluating a project's transportation impacts and identifies VMT as the most appropriate measure to determine the significance of transportation impacts. Section 15064.3 generally states that a project's effect on automobile delay shall not constitute a significant environmental impact under CEQA. The specific criteria for analyzing transportation impacts are provided in Section 15064.3, subdivision (b) of the ~~State~~ CEQA Guidelines. In general, SB 743 indicates that the total VMT that exceeds an applicable threshold of significance may indicate a significant impact.

### Technical Advisory on Evaluating Transportation Impacts in CEQA

In response to SB 743 and the addition of Section 15064.3 to the ~~State~~ CEQA Guidelines, the OPR adopted the *Technical Advisory on Evaluating Transportation Impacts in CEQA* (Technical Advisory) in December 2018 to provide technical recommendations on methods for assessing VMT, thresholds of significance, and mitigation measures. The recommendations in the Technical Advisory are intended to provide guidance to agencies and the public for assessing VMT-related transportation impacts under CEQA. Details of the recommended thresholds of significance from the Technical Advisory are provided in Section 4.~~17~~14.4.2, below.

## 4.17.3.2 Regional

### San Diego Association of Governments

#### San Diego Forward: The Regional Plan

SANDAG's *San Diego Forward: The Regional Plan* (Regional Plan) was adopted by the SANDAG Board of Directors on October 9, 2015, to establish a long-range blueprint for the San Diego region's growth and development through the year 2050. The Regional Plan was developed in close partnership with the region's 18 cities and ~~San Diego~~the County ~~government~~, and aims to provide innovative mobility choices and planning to support a sustainable quality of life in a healthy region with a vibrant economy. The Regional Plan integrates ~~both~~ the 2004 Regional Comprehensive Plan ~~and~~, the 2050 Regional Transportation Plan (RTP~~)~~), and the Sustainable Communities Strategy (SCS) into one unified plan. By incorporating the SCS, the Regional Plan is in compliance with SB 375, which identifies how the region will address GHG emissions to meet ~~s~~State-mandated levels and focuses on land use planning and transportation issues in an attempt to develop sustainable growth patterns on a regional level.

State law requires ~~RTPs~~the RTP to be updated every four years. The State ~~of California~~ established climate mandates for regional planning organizations across the ~~s~~State in 2018; so the SANDAG Board of Directors approved a two-year extension to develop the 2021 Regional Plan. ~~A Draft~~The final 2021 Regional Plan is ~~anticipated to be~~ available ~~for~~to the public ~~review in spring 2021.~~

#### Riding to 2050, the San Diego Regional Bike Plan

*Riding to 2050, the San Diego Regional Bike Plan* (Regional Bike Plan) was developed to support the 2004 Regional Comprehensive Plan and the 2050 RTP in implementing the regional strategy for

utilizing bicycles as a valid form of everyday travel. The Regional Bike Plan, as a part of the SCS mandated by SB 375, provides for a detailed Regional Bike Network, as well as the programs that are necessary to support it. Implementation of the Regional Bike Plan would help the region meet its goals for reducing GHG emissions and improve mobility.

### 2018 Regional Transportation Improvement Program

The 2018 Regional Transportation Improvement Program ~~(RTIP)~~ is a multi-billion-dollar 5-year program of major transportation projects funded by federal, ~~s~~State, TransNet local sales tax, and other local and private funding covering fiscal year 2016/2017 to 2020/2021. The program development process, which includes ~~an~~the air quality emissions analysis for all regionally significant projects, requires approval by the Federal Highway Administration ~~(FHWA)~~ and the Federal Transit Administration ~~(FTA).~~ The ~~RTIP~~Regional Transportation Improvement Program is a prioritized program designed to implement the region's overall strategy for providing mobility and improving the efficiency and safety of the transportation system, while reducing transportation-related air pollution in support of efforts to attain federal and ~~s~~State air quality standards for the region. The program also incrementally implements the Regional Plan, which is the long-range transportation plan for the San Diego region (SANDAG 2015).

## 4.17.3.3 Local

### County of San Diego Regulatory Ordinances, Sections 77.201 – 77.220, Transportation Impact Fee

The Transportation Impact Fee (TIF) program provides funding for mitigation of cumulative impacts and for proportional construction of transportation facilities needed to support traffic generated by new development to meet State law requirements. Per the County Board of Supervisors ordinance, effective December 31, 2012, the County will collect TIF at or before building permit issuance for projects that generate new trips.

### County of San Diego General Plan Policies

The General Plan includes goals and policies that address transportation and traffic within the Mobility, Land Use, and Safety elements. The~~se~~ goals and policies that are applicable to the project are summarized below.

#### Mobility Element

**Policy M-2.1: Level of Service Criteria.** Require development projects to provide associated road improvements necessary to achieve an LOS of "D" or higher on all Mobility Element roads except for those where a failing LOS has been accepted by the County pursuant to the criteria specifically identified in the accompanying text box (Criteria for Accepting a Road Classification with LOS E/F). When development is proposed on roads where a failing LOS has been accepted, require feasible mitigation in the form of road improvements or a fair share contribution to a road improvement program, consistent with the Mobility Element road network.

**Policy M-2.2: Access to Mobility Element Designated Roads**. Minimize direct access points to Mobility Element roads from driveways and other non-through roads to maintain ~~adequate~~the capacity and improve traffic operations.

**Policy M-2.3: Environmentally Sensitive Road Design**. Locate and design public and private roads to minimize impacts on significant biological and other environmental and visual resources. Avoid road alignments through floodplains to minimize impacts on floodplain habitats and limit the need for constructing flood control measures. Design new roads to maintain wildlife movement and retrofit existing roads for that purpose. Utilize fencing to reduce roadkill and to direct animals to under crossings.

**Policy M-3.1: Public Road Rights-of-Way**. Require development ~~projects~~ to dedicate right-of-way for public roads and other transportation routes identified in the Mobility Element roadway network (see Mobility Element Network Appendix), Community Plans, or Road Master Plans. Require the provision of sufficient right-of-way width, as specified in the County Public Road Standards and Community Trails Master Plan, to adequately accommodate all users, including transit riders, pedestrians, bicyclists, and equestrians.

**Policy M-3.2: Traffic Impact Mitigation**. Require development ~~projects~~ to contribute ~~their~~ "its fair share" toward financing transportation facilities, including mitigating the associated direct and cumulative traffic impacts caused by their project on both the local and regional road networks. Transportation facilities include road networks and related transit, and pedestrian, bicycle and equestrian facilities.

**Policy M-3.3: Multiple Ingress and Egress**. Require development ~~projects~~ to provide multiple ingress/egress routes in conformance with State law, and local regulations.

**Policy M-4.4: Accommodate Emergency Vehicles**. Design and construct public and private roads to allow for necessary access for appropriately sized fire apparatus and emergency vehicles while accommodating outgoing vehicles from evacuating residents.

~~**Policy M-11.2: Bicycle and Pedestrian Facilities in Development**. Require development projects and town center plans in Villages and Rural Villages to incorporate site design and on-site amenities for alternate modes of transportation, such as comprehensive bicycle and pedestrian networks and facilities. This will include both on-street facilities as well as off-street bikeways to safely serve the full range of intended users. Also designate areas for transit facilities, where appropriate and coordinated with the transit service provider.~~

~~**Policy M-11.4: Pedestrian and Bicycle Network Connectivity**. Require development projects in Villages and Rural Villages to provide comprehensive internal pedestrian and bicycle networks that connect to existing or planned adjacent community and county-wide networks.~~

### Land Use Element

**Policy LU-5.5: Projects that Impede Non-Motorized Travel**. Ensure that development projects and road improvements do not impede bicycle and pedestrian access. Where impacts on existing planned routes would occur, ensure that impacts are mitigated, and acceptable alternative routes are implemented. Examples include large parking areas that cannot be crossed by non-motorized vehicles, and new developments that block "through access" on existing or potential bicycle and pedestrian routes.

**Policy LU-6.10: Protection from Hazards**. Require that development ~~projects~~ be located and designed to protect property and residents from the risks of natural and man-induced hazards.

**Policy LU-9.8: Village Connectivity and Compatibility with Adjoining Areas**. Require new development within Villages to include road networks, pedestrian routes, and amenities that create or maintain connectivity; and site, building, and landscape design that is compatible with surrounding areas. (See applicable community plan for possible relevant policies.)

### Safety Element

**Policy S-3.4: Service Availability**. Plan for development where fire and emergency services are available or planned.

**Policy S-3.5: Access Roads**. Require development ~~projects~~ to provide additional access roads when necessary to provide for safe access of emergency equipment and civilian evacuation concurrently.

**Policy S-14.1: Vehicular Access to Development**. Require development ~~projects~~ to provide vehicular connections that reduce response times and facilitate access for law enforcement personnel, whenever feasible.

## Alpine Community Plan

The *Alpine Community Plan*, amended in December 2016, contains goals, policies and recommendations to maintain an effective circulation system in the community. There are no specific policies or recommendations for ~~development projects~~developments within ~~the~~ Alpine community that are applicable to transportation and circulation.

## San Diego County Active Transportation Plan

The San Diego County Active Transportation Plan (ATP) promotes active transportation through pedestrian and bicycle improvements throughout the unincorporated ~~County~~area. The ATP consists of an update to the County's Bicycle Transportation Plan (dated 2008) and the Pedestrian Area Plans (prepared for Alpine, Borrego Springs, Fallbrook Town Center, Lakeside Town Center and Spring Valley) into one combined ATP. The ATP was approved by the County Board of Supervisors on October 31, 2018. The ATP identifies goals, objectives, and actions related to improving safety to reduce auto collisions with cyclists and pedestrians, increasing accessibility and connectivity with an active transportation network, and improving public health by encouraging walking and biking. The plan identifies existing and proposed bikeways, and classifies bikeways into three types of bicycle facilities: bike path, bike lane, and cycle track. *Bike paths* refer to paths that provide for bicycle travel on a paved right-of-way completely separated from any street or highway. A *bike lane* provides a striped and stenciled lane for one-way travel on a street or highway. *Cycle tracks* provide a physically separated bikeway for the exclusive use of bicycles.

## County of San Diego Transportation Study Guidelines

The County of San Diego Transportation Study Guidelines (TSG), adopted in September 2022 in response to SB 743, provides criteria on how projects should be evaluated for consistency related to the County's transportation goals, policies, and plans, and through procedures established under CEQA. The TSG establishes the contents and procedures for preparing a Transportation Study for projects in the unincorporated area. The TSG aids in determining appropriate mitigation under CEQA, as well as site-specific improvements to the transportation system to accommodate project traffic.

# 4.17.4 Project Impact Analysis

## 4.17.4.1 Methodology

Potential transportation and circulation impacts associated with the project are summarized below based on information contained in Appendix I of ~~this~~the Draft EIR. Methods used to determine impacts are based ~~in part~~ on ~~the County of San Diego Traffic Study Guidelines and in conformance with the State of~~ OPR's *Technical Advisory on Evaluating Transportation Impacts in CEQA* (Technical Advisory), as well as input from the County of San Diego Department of Public Works. ~~(~~DPW~~).~~

### Transportation and Circulation During Construction

As discussed in Section 4.14.3.1, SB 743 establishes VMT as the new criteri~~on~~a for determining transportation impacts. Section 15064.3 was added to the ~~State~~ CEQA Guidelines to address SB 743. In relation to construction VMT analyses, ~~State~~ CEQA Guidelines Section 15064.3 (b)(3) states:

> "Qualitative Analysis. If existing models or methods are not available to estimate the vehicle miles traveled for the particular project being considered, a lead agency may analyze the project's vehicle miles traveled qualitatively. Such a qualitative analysis would evaluate factors such as the availability of transit, proximity to other destinations, etc. For many projects, a qualitative analysis of construction traffic may be appropriate."

For the purposes of ~~determining~~analyzing construction-related VMT impacts of the project, the analysis qualitatively considers the potential change in VMT due to construction, types of construction-related congestion and traffic hazards.

### Transportation and Circulation During Operation

The ~~San Diego~~ County Board of Supervisors adopted new guidelines for the County ~~of San Diego Transportation Study Guidelines (~~TSG in September 2022. These County ~~TSG) on June 24, 2020.~~ specific thresholds are in accordance and aligned with the industry's best practice and guidance from the OPR to conduct the VMT analysis. The recently adopted County TSG is consistent with ~~the State~~ CEQA Guidelines and utilizes VMT as a metric for evaluating transportation-related impacts. Per the County TSG, all projects within the unincorporated ~~portions of San Diego County~~area are required to ~~use~~go through a screening process to determine the level of transportation analysis that is required. An excerpt of the screening process is provided in Attachment A of Appendix I.

Based on Section 3.3 of the County TSG, when conducting a screening analysis, projects that can be classified within any of the following screening criteria are assumed to have a less than significant VMT impact, due to project's characteristic and/or location and are therefore exempt from additional VMT CEQA analysis:

- *Project located in VMT efficient area*: A VMT efficient area is any area with an average VMT per Resident, VMT per Employee, or VMT per Service Population below the baseline average for the ~~Unincorporated County average.~~San Diego region. Land use projects may qualify for the use of VMT efficient area screening if the project can be reasonably expected to generate a VMT per Resident, per Employee, or per Service Population, respectively, that is similar to the existing land uses in the VMT efficient area.

- *Project located in infill Village Area:* An infill development is defined by OPR as "…building within unused and underutilized lands within existing development patterns, typically but not exclusively within urban areas." Multiple land use and transportation network variables were identified to create a quantitative definition for "infill development" in the County, including household density, intersection density, and job accessibility. Development in more dense areas with high job accessibility leads to more diversity in land use, demand for transit (bus and trolley) and multimodal infrastructure (walking and biking), and shorter vehicle trips, which reduce GHGs and VMT.
- *Small residential and employment projects*: Projects generating less than 110 daily vehicle trips (trips are based on the number of vehicle trips calculated using national ITE trip generation rates with any alternative modes/location-based adjustments are applied) may be presumed to have a less than significant impact absent substantial evidence to the contrary.
- *Project located in Transit Accessible Area*: Projects located within a half mile of an existing major transit stop or an existing stop along a high-quality transit corridor may be presumed to have a less than significant impact absent substantial evidence to the contrary. Note that Sprinter stations are considered major transit stops. This presumption may not apply if the project:
    - Has a Floor Area Ratio of less than 0.75.
    - Includes more parking for use by residents, customers, or employees of the project than required by the County.
    - Is inconsistent with SANDAG's most recent Sustainable Communities Strategy (SCS).
    - Replaces affordable residential units with a smaller number of moderate- or high-income residential units.
- *Locally serving retail/service projects:* Local serving retail/service projects less than 50,000 square feet may be presumed to have a less than significant impact absent substantial evidence to the contrary. Local serving retail/service generally improves the convenience of shopping close to home and has the effect of reducing vehicle travel.
- *Locally serving public facilities and other uses*: Public facilities that serve the surrounding community or public facilities that are passive use may be presumed to have a less than significant impact absent substantial evidence to the contrary. These do not include facilities or uses that would attract users from outside the vicinity of the use. The following are examples of locally serving facilities and uses:
    - Transit centers
    - Schools
    - Libraries
    - Post offices
    - Park-and-ride lots
    - Local health/medical clinics
    - Law enforcement and fire facilities
    - ~~Local~~Open space preserves, local parks, and trailheads
    - Government offices

- Communication and utility buildings
- Water sanitation buildings
- Waste management buildings

- *Redevelopment projects with greater VMT efficiency*: Redevelopment projects with greater VMT efficiency in which a project replaces existing VMT-generating land uses, the project may be presumed to have a less than significant impact if the total project VMT is less than the existing land use's total VMT, absent substantial evidence to the contrary.
- *Affordable housing*: An affordable housing project may be presumed to have a less than significant impact absent substantial evidence to the contrary if 100% of units are affordable.

Projects that do not meet the screening criteria are required to conduct a VMT analysis using either the County's screening map or the SANDAG Regional Transportation Model to determine whether the project is below the threshold established in the County TSG.

~~The~~Additionally, the TIS (Appendix I) was prepared to identify potential transportation related impacts on roadway segments, intersections, and freeway on-ramps associated with the project. This TIS was performed in accordance with the requirements of the County TSG and in conformance with the enhanced CEQA project review process. LOS is the metric for describing operational conditions within a traffic stream, and the motorist's and/or passengers' perception of operations. A LOS definition generally describes these conditions in terms of such factors as delay, speed, travel time, freedom to maneuver, interruptions in traffic flow, queuing, comfort, and convenience. Table 4.17-1 describes generalized definitions of the various LOS categories (A through F) as applied to roadway operations. LOS D is considered acceptable within the ~~County of San Diego.~~unincorporated area.

**Table 4.17-1 Level of Service Definitions**

| LOS Category | Definition of Operation |
|---|---|
| A | This LOS represents a completely free-flow condition, where the operation of vehicles is virtually unaffected by the presence of other vehicles and only constrained by the geometric features of the highway and by driver preferences. |
| B | This LOS represents a relatively free-flow condition, although the presence of other vehicles becomes noticeable. Average travel speeds are the same as in LOS A, but drivers have slightly less freedom to maneuver. |
| C | At this LOS the influence of traffic density on operations becomes marked. The ability to maneuver within the traffic stream is clearly affected by other vehicles. |
| D | At this LOS, the ability to maneuver is notably restricted due to traffic congestion, and only minor disruptions can be absorbed without extensive queues forming and the service deteriorating. |
| E | This LOS represents operations at or near capacity. LOS E is an unstable level, with vehicles operating with minimum spacing for maintaining uniform flow. At LOS E, disruptions cannot be dissipated readily thus causing deterioration down to LOS F. |
| F | At this LOS, forced or breakdown of traffic flow occurs, although operations appear to be at capacity, queues form behind these breakdowns. Operations within queues are highly unstable, with vehicles experiencing brief periods of movement followed by stoppages. |

Roadway segment LOS standards and thresholds provide the basis for analysis of arterial roadway segment performance. The analysis of roadway segment LOS is based on the functional classification of the roadway, the maximum capacity, roadway geometrics, and existing or forecast average daily traffic volumes. Appendix I presents the existing roadway segments and intersections, the roadway segment capacity, and LOS standards utilized to analyze roadways evaluated in the TIS.

## 4.17.4.2 Thresholds of Significance

### Appendix G of the ~~State~~ CEQA Guidelines

The following significance criteria are based on Appendix G of the ~~State~~ CEQA Guidelines and provide the basis for determining the significance of impacts on existing transportation and circulation conditions as a result of the project's implementation. The determination of whether a transportation and circulation impact would be significant is based on the answers to the threshold questions.

Impacts are considered significant if the project would result in any of the following:

1. Conflict with a program, plan, ordinance, or policy addressing the circulation system.
2. Conflict or be inconsistent with ~~State~~ CEQA Guidelines Section 15064.3, subdivision (b).
3. Substantially increase hazards because of a geometric design feature or incompatible uses.
4. Result in inadequate emergency access.

### County of San Diego Guidelines for Determining Significance

~~The San Diego County Board of Supervisors adopted the County TSG on June 24, 2020.~~ The ~~recently adopted~~2022 County TSG was adopted on September 28, 2022, and is consistent with the ~~State~~ CEQA Guidelines and utilizes VMT as a metric for evaluating transportation-related impacts. Per the County TSG, all projects within the unincorporated portions of San Diego County are required to ~~use~~go through a screening process to determine the level of transportation analysis that is required. Under SB 743, CEQA analysis can no longer use road congestion or the amount of time a driver is delayed on the road—commonly measured by LOS—when analyzing transportation impacts. Therefore, instead of using LOS, a project's environmental impacts must be evaluated by the amount and distance people drive to destinations.

# 4.17.4.3 Project Impacts and Mitigation Measures

***Threshold 1: The project would not conflict with a program, plan, ordinance, or policy addressing the circulation system.***

## County Park ~~and~~, Trails, and Open Space ~~/Preserve~~

### Impact Discussion

#### Construction

The programs, plans, ordinances, and policies addressing the circulation system that are applicable to the project have been described above in Section 4.17.3. The project's potential to conflict with ~~SD~~SB 743 is addressed in the analysis for the next threshold question (Threshold 2) as it relates to ~~State~~ CEQA Guidelines Section 15064.3(b).

Construction may result in temporary partially or completely blocked northbound or southbound travel lanes along South Grade Road and/or Tavern Road due to the use of large construction equipment, construction material deliveries, and construction of the sewer line in the centerline of South Grade Road and Tavern Road. The project also includes the development of a vegetated berm along the eastern and southern boundary of the project site along South Grade Road. The project includes improvements to circulation facilities including a decomposed granite walking path situated between the proposed berm and South Grade Road, the primary ingress/egress driveway on the northeastern side of the project site~~,~~ across from Calle De Compadres, and the secondary ingress/egress in the southwestern corner of the project site. Construction of the circulation-related features of the project may encroach into the public right-of-way during portions or the entirety of the construction process. These temporary lane closures or impediments within the roadway could delay or obstruct the movement of traffic along South Grade Road and Tavern Road. However, when construction interrupts the normal function of a roadway, a Traffic Control Permit must be obtained from ~~the~~ County ~~of San Diego Department of Public Works~~DPW. County DPR or its contractors would be responsible for obtaining the Traffic Control Permit which requires the installation and maintenance of appropriate traffic control in accordance with a Traffic Control Plan. The traffic control methods used to maintain safe traffic flow could include barriers, signs, and flags. The implementation of the Traffic Control Plan would ensure continued flow of traffic in the public right-of-way during construction. Otherwise, all construction would occur within the project site, and would not prevent the implementation of circulation programs or plans for the surrounding circulation system, including but not limited to roadway improvements or development of bicycle or pedestrian facilities. As such, the project would not conflict with a program, plan, ordinance, or policy addressing the circulation system; impacts would be less than significant.

#### Operation

Operation of the project would involve active and passive recreational facilities, as well as the associated circulated-related improvements~~, as mentioned above,~~ along South Grade Road, as mentioned above. Operation of the active and passive park would also contribute to additional users of the surrounding circulation system, primarily accessing the project site by car. The project is estimated to draw an average of 500 daily visitors. The potential effect of the daily visitors to regional VMT goals as it relates to SB 743 and ~~State~~ CEQA Guidelines Section 15064.3(b) is

discussed ~~under Threshold 2,~~ below. ~~The~~Otherwise, the project would not include any features that would change or prevent the use of local circulation facilities.

~~The~~Furthermore, the TIS ~~prepared~~conducted by Chen Ryan for the project (Appendix I) analyzed the effect of project-generated traffic on the existing transportation facilities. The TIS analysis indicates all of the roadway segments and intersections included in the study area operated at acceptable LOS B. The existing roadway segments plus the project conditions are anticipated to operate at acceptable LOS C or better, and intersections are anticipated to continue to operate at acceptable LOS B or better with the addition of project traffic. The results of the analysis state that the addition of project traffic would not cause a significant impact to the study area roadway segments and intersections when compared to both existing conditions plus the project, as well as future conditions (based on growth projections) plus the project. This indicates the project would not have a detrimental effect on the LOS of project area roadways and intersections, and would be consistent with the local policies governing target LOS thresholds, including but not limited to, the County of San Diego General Plan. Therefore, operation of the project would not conflict with the implementation of any programs, plans, ordinances, and policies addressing the circulation system. Impacts would be less than significant.

### Impact Determination

The project would not conflict with any programs, plans, ordinances, and policies addressing the circulation system. Impacts would be less than significant.

### Mitigation Measures

Mitigation is not required.

### Level of Significance After Mitigation

Impacts would be less than significant.

***Threshold 2: The project would not conflict or be inconsistent with ~~State~~ CEQA Guidelines Section 15064.3, subdivision (b).***

## County Park, Trails, and Open Space~~/Preserve~~

### Impact Discussion

#### Construction

Construction of the project would provide construction jobs for the region; however, the construction jobs are expected to be filled ~~by current~~with construction personnel from the local labor market, and would not increase the demand ~~for~~on construction personnel such that individuals would be traveling from outside the region to fill the positions. Therefore, project construction jobs would result in redistributing existing vehicle trips around the region and would not induce an increase in VMT. Furthermore, implementation of the Traffic Control Plan pursuant to the Traffic Control Permit~~,~~ in the event of encroachment into the public right-of-way during construction activities~~,~~ would serve to reduce potential impacts on vehicle travel. Therefore, the

project would not induce ~~or~~an increase in VMT and would not conflict or be inconsistent with ~~State~~ CEQA Guidelines Section 15064.3, subdivision (b), and the impact would be less than significant.

#### Operation

A screening analysis was conducted by Chen Ryan (see Appendix I) for the project using the County TSG screening criteria outlined in Section 4.17.4.1. *Methodology.* Based upon the OPR guidelines and criterion provided therein as well as Attachment A of Appendix I, the project ~~would fall under the local~~ is considered locally serving public facilities and other uses (open space preserves, local parks, and trailheads) category. The County TSG states that local ~~serving~~ public facilities ~~and other uses~~that fall in the public serving category are presumed to have less than significant VMT impact. Therefore, operation of the project would not conflict or be inconsistent with ~~State~~ CEQA Guidelines Section 15064.3, subdivision (b), and the impact would be less than significant.

### Impact Determination

The project would not conflict or be inconsistent with ~~State~~ CEQA Guidelines Section 15064.3, subdivision (b), and the impact would be less than significant.

### Mitigation Measures

Mitigation is not required.

### Level of Significance After Mitigation

Impacts would be less than significant.

***Threshold 3: The project would not substantially increase hazards because of a geometric design feature or incompatible uses.***

## County Park, Trails, and Open Space~~/ Preserve~~

### Impact Discussion

#### Construction

The project would involve the construction of two ingress/egress driveways providing access to the parking and staging areas within the park from South Grade Road~~:~~ as well as an all-way stop at South Grade Road and Calle De Compadres. As part of the standard project approval process, the proposed access improvements would be reviewed by ~~the~~ County ~~of Department of Public Works (~~DPW~~)~~ for safety and sight distance standards. Upon review of the improvements, County DPW would either approve the plans or provide specific recommendations for improving the safety of the proposed ingress/egress. County DPR would comply with all recommendations of County DPW.

As discussed in the analysis for Threshold 1, if encroachment into the public-right-of-way is to occur during construction of certain project elements, including the optional sewer line, or due to the use of large equipment or vehicles, a Traffic Control Plan pursuant to the Traffic Control Permit would be implemented. As part of the Traffic Control Plan, barriers, signs, or flags ~~may be~~maybe used to direct traffic. These traffic control devises would be approved during the review and approval process for the Traffic Control Permit, ensuring that they would be appropriate and safe devi~~c~~es

that would not create a hazard. The optional sewer line in the ~~center line~~centerline along South Grade Road and Tavern Road would require a Traffic Control Plan during construction. Therefore, construction of the project would not substantially increase hazards because of a geometric design feature or incompatible uses; impacts would be less than significant.

### Operation

Upon approval of the transportation improvements by County DPW during construction, the project would not contain any hazards related to geometric design features. Operation of the project would not include any incompatible uses, such as farm equipment that could result in safety hazards related to increased congestion and faster moving vehicles encountering slower moving vehicles along South Grade Road. Work trucks may ~~periodically~~ be utilized at the project site for maintenance or landscaping; however, these types of vehicles do not represent an incompatible use on a rural roadway such as South Grade Road.

The TIA completed by Chen Ryan (Appendix I) performed a queuing analysis for the two proposed driveways for access to the project. Based on the queuing analysis, the vehicle queues at the project driveways and South Grade Road are expected to fit within the existing storage ~~lanes~~ and would not impede traffic at the driveway or the adjacent roadway system. (Queuing analysis results can be found in Appendix H of Appendix I.) The TIA also included a site access evaluation. As part of the evaluation, an all-way stop-controlled intersection warrant analysis was conducted to determine if the peak hour volumes at the intersection of Calle de Compadres justified the installation of stop signs at the intersection for all directions of traffic. According to Caltrans' *California Manual on Uniform Traffic Control Devices* (2014), the intersection does not meet the minimum peak hour volumes for an all-way stop-controlled intersection. Additionally, the project driveways are projected to operate at LOS A, indicating free-flowing traffic, during both AM and PM peak hours with the addition of the project-generated traffic. ~~The~~Although the intersection ~~at South Grade Road and Calle de Compadres will operate adequately with~~does not meet the Caltrans minimum peak-hour volumes for an ~~"~~all-way~~"~~ stop, the County will implement an all-way stop-controlled intersection at Calle de Compadres. as an additional project design feature to improve safety conditions, although not required. The access routes would not substantially increase at the intersections with South Grade Road, or internally on the project site.

Therefore, the project would not substantially increase hazards because of a geometric design feature or incompatible uses; impacts would be less than significant.

## Impact Determination

The project would not substantially increase hazards because of a geometric design feature or incompatible uses. Impacts would be less than significant.

## Mitigation Measures

Mitigation is not required.

## Level of Significance After Mitigation

Impacts would be less than significant.

***Threshold 4: The project would not result in inadequate emergency access.***

## County Park, Trails, and Open Space~~/Preserve~~

### Impact Discussion

#### Construction

Construction equipment for the project would include tractors, excavators, backhoes, water truck, drill rig, bobcat, forklift, rollers, a rubber tire loader, wheel tractor scrapers, an air compressor, a generator set, a crane, and a concrete truck. Construction staging activities would occur adjacent the project site. Construction may result in temporary partially or completely blocked travel lanes along South Grade Road due to large construction equipment in the public right-of-way, construction material deliveries, or construction activities associated with the project features that are adjacent to South Grade Road. These temporary lane closures or impediments within the roadway could delay or obstruct the movement of emergency vehicles along South Grade Road. However, when construction interrupts the normal function of a roadway, a Traffic Control Permit must be obtained from ~~the~~ County ~~of San Diego Department of Public Works.~~DPW. County DPR or its contractors would be responsible for obtaining the Traffic Control Permit which requires the installation and maintenance of appropriate traffic control in accordance with a Traffic Control Plan. The traffic control methods used to maintain safe traffic flow could include barriers, signs, and flags. The implementation of the Traffic Control Plan would ensure safe passage of emergency vehicles in the public right-of-way, and adequate access to the project site by emergency vehicles. Additionally, construction activities onsite would not prevent emergency vehicles from reaching the project site. Impacts would be less than significant.

#### Operation

As part of standard project approval, the County Fire ~~Services~~Protection District (FPD) staff (i.e., County Fire Marshall) will review the project design to ensure the project site is accessible for emergency vehicles, and onsite utilities are sufficient for emergency response. Therefore, the project would comply with the County Fire Marshall review and approval. County DPR is preparing a Site Evacuation Plan as part of the project operational procedures that ~~will outline~~outlines the evacuation routes to be used by visitors and staff within the Alpine Park site in the event of an onsite or offsite emergency situation. The Site Evacuation Plan only addresses evacuation within the boundaries of the project site. Once visitors leave the park, evacuation ~~procedures~~ would be under the jurisdiction of Unified San Diego County Emergency Services Organization ~~(EOS), the~~, Alpine ~~Fire Department (AFD),~~FPD, and other jurisdictional agencies, depending on the ~~nature of the~~ emergency situation (i.~~e.g.~~, California Department of Forestry and Fire Protection or County ~~Fire Authority~~FPD may be involved in wildfire emergency situations). During project operation, County DPR would work with ~~AFD~~Alpine FPD and ~~OES~~the Office of Emergency Services to coordinate emergency access and evacuation procedures~~,~~ as necessary. Therefore, operation of the project would not result in inadequate emergency access. Impacts would be less than significant. The Alpine Community Park Fire Evacuation Analysis prepared for the project is included as Appendix K of the Recirculated Draft EIR. This analysis assessed the time required for evacuation from the project site under several scenarios (e.g., a wind-driven fire that results in a required evacuation, affecting the project site and surrounding community). County FPD and Alpine FPD reviewed the evacuation analysis and conclusions derived in this Final EIR.

### Impact Determination

The project would not result in inadequate emergency access. Impacts would be less than significant.

### Mitigation Measures

Mitigation is not required.

### Level of Significance After Mitigation

Impacts would be less than significant.

## 4.17.5 Summary of Significant Impacts

There would be no significant impacts associated with transportation and circulation.

Section 4.18
# Tribal Cultural Resources

## 4.18.1 Overview

This section evaluates existing conditions for tribal cultural resources (TCRs) within the ~~project vicinity~~County, and the potential effects that implementation of the project may have on these resources. A cultural resources study ~~was conducted that included~~including a record search, literature review, Native American Heritage Commission (NAHC) Sacred Lands File (SLF) search, and tribal outreach~~. Also,~~; a cultural resources survey~~,~~ totaling approximately 96.6 acres~~,~~; and testing/evaluation of two archaeological sites~~, was~~ were conducted ~~(see section 4.5).~~in support of the effort to create the proposed Alpine Park. The cultural resource~~s~~ survey was completed to identify and map existing cultural resources within the project site and provide County DPR with management information for addressing potentially significant cultural resources and TCRs. These measures include preservation recommendations and protective measures.

## 4.18.2 Existing Conditions

Assembly Bill (AB) 52, signed by the California Governor in September of 2014, establishes a new class of resources under CEQA: "tribal cultural resources." On July 1, 2015, TCRs were added to the list of resources that require analysis under CEQA.

## 4.18.3 Applicable Laws and Regulations

### 4.18.3.1 State

#### Assembly Bill 52

Chapter 532, Statutes of 2014 (i.e., AB 52), requires that lead agencies evaluate a project's potential to affect TCRs. Such resources include sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are eligible for inclusion in the California Register of Historical Resources or included in a local register of historical resources (Public Resources Code [PRC] Section 21074). AB 52 also gives lead agencies the discretion to determine, supported by substantial evidence, whether a resource falling outside of the definition stated above nonetheless qualifies as a TCR.

In accordance with AB 52 (specifically PRC 21080.3.1), a CEQA lead agency must consult with California Native American tribes that are traditionally and culturally affiliated with the geographic area of the project and that have previously requested that the lead agency provide the tribe with notice of such projects. Consultation as defined under AB 52 includes, but is not limited to, discussing the type of environmental review necessary, the significance of TCRs, the significance of project impacts on the TCRs, and alternatives and mitigation measures recommended by the tribe. Parties must consult in good faith and consultation is deemed concluded when (1) the parties agree

to measures to avoid or reduce a significant impact on a TCR (if such a significant impact exists) or (2) when a party concludes that mutual agreement cannot be reached. Furthermore, under AB 52, mitigation measures agreed upon during consultation must be included in the environmental document and, if no formal agreement on the appropriate mitigation has been established, mitigation measures that avoid or substantially lessen potentially significant impacts should be implemented.

# 4.18.4 Project Impact Analysis

## 4.18.4.1 Methodology

~~Both a search of available records and consultation with recognized tribes were conducted for the project.~~ Records searches at the South Coastal Information Center were conducted for the project area to determine if previously recorded TCRs are present within the project site. No TCRs listed in or eligible for listing in the California Register of Historical Resources were identified during the records search. Additionally, an SLF search of the project area was obtained on May 3, 2019, from NAHC for the project. The SLF file search was positive and NAHC recommended contacting the Sycuan Band of the Kumeyaay Nation and Viejas Band of Kumeyaay Indians (Viejas Band). Letters were ~~then~~ sent to the two tribes~~,~~ and 12 other tribes~~,~~ on May 21, 2019, notifying them of the project and the NAHC SLF results, and seeking their comment and input. The Viejas Band responded on June 5, 2019, that the project site has cultural significance or ties to the tribe and requested a tribal monitor be present for ground-disturbing activities and to be informed of any new developments related to cultural resources in the project area. The Viejas Band did not indicate or identify that any TCRs ~~to be~~are present within the project area. No response was received from the Sycuan Band of the Kumeyaay Nation.

### Appendix G of the ~~State~~ CEQA Guidelines

For the purposes of the analysis in this Final EIR, and in accordance with Appendix G of the ~~State~~ CEQA Guidelines, the project would result in a significant environmental impact under the following conditions:

1. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:
    a. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or
    b. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

## County of San Diego Guidelines for Determining Significance

The following significance criteria are based on the *County of San Diego Guidelines for Determining Significance for Cultural Resources: Archaeological and Historical Resources* (County of San Diego 2007). Impacts are considered significant if the project would result in any of the following:

1. Cause a substantial adverse change in the significance of a historical or archaeological resource as defined in Section 15064.5.
2. Directly or indirectly destroy a unique paleontological resource or site or unique geological feature.
3. Disturb any human remains, including those interred outside of formal cemeteries.

# 4.18.4.2 Project Impacts and Mitigation Measures

***Threshold 1: Implementation of the project <u>would</u> cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:***

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

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

## County Park and Trails

### Impact Discussion

Records searches and informal Native American outreach have not revealed that any known "historical resources" as defined by CEQA are present in the project area. Pursuant to PRC Section 21080.3.1 (AB 52), California Native American tribes traditionally and culturally affiliated with the project area can request notification of projects in their traditional cultural territory.

Letters were sent to the NAHC on behalf of ~~the~~ County DPR on April 19, 2019, requesting a review of the SLF and a list of contacts. A response letter from Steven Quinn of the NAHC, dated May 3, 2019, was received, ~~which~~and noted that the SLF search was positive and recommended contacting the Sycuan Band of Kumeyaay Nation and the Viejas Band in addition to 17 other contacts. Letters requesting information and comment were sent to the listed contacts by ICF on May 21, 2019. A

response by Clint Linton of the Iipay Nation of Santa Ysabel was received via email on May 22, 2019. Mr. Linton deferred comment to the Viejas Band and supports any comments or requests made by them. The Viejas Band responded by letter on June 5, 2019, stating that the project site has cultural significance to the tribe and requested that a Kumeyaay monitor be present on site for ground-disturbing activities and to be informed of any new developments such as inadvertent discoveries.

County DPR staff responded to a request to consult under AB 52 from the Viejas Band. During consultation on March 10, 2021, the Viejas Band requested a Kumeyaay cultural monitor be on site for ground-disturbing activities and to be informed of any new developments such as inadvertent discovery of cultural artifacts, cremation sites, or human remains. Lorrie Bradley of ~~the~~ County DPR sent an email on July 11, 2021, following up to see if consultation could be concluded and stat~~in~~ged the project would have cultural monitors, including a Kumeyaay monitor, on site during disturbance of native soil. AB 52 consultation was concluded with the Viejas Band on July 28, 2021, with the following request that ~~the~~ County DPR agrees to: "Viejas requested that any ground disturbance and not just native soils have monitoring. With this inclusion in project conditioning, Viejas agreed to conclude consultation."

Due to the relatively undeveloped nature of the project site and the surrounding area, it is possible that significant TCRs ~~c~~would be encountered during construction of the project. ~~It~~ If an archaeological resource is ~~therefore also~~encountered during project construction, it is possible that the resource could be a ~~significant~~ TCR, and implementation of the project may cause a substantial adverse change in the significance of a TCR~~,~~ as defined in Section 21074 of the PRC and ~~the State~~ CEQA Guidelines Section 5021.1.

### Construction

Ground-disturbing activities associated with construction of the project ~~could~~may disturb undiscovered TCRs. As a result of the potential for inadvertent damage or destruction of undisturbed TCRs, the project has the potential to materially alter physical characteristics that would qualify a TCR for inclusion in the NRHP and CRHR (**Impact TCR-1**).

### Operation

Operation of the project would not result in ground disturbance or structural modifications ~~beyond those having been completed during construction.~~ Therefore, in the absence of ~~further~~ ground disturbance, no operations-related impacts on TCRs are expected to occur.

## Impact Determination

**Impact-TCR-1: Excavation Related to the Project Would Potentially Damage Tribal Cultural Resources.** Ground-disturbing construction activities associated with the project have the potential to unearth unknown TCRs that may be located in the project area. Impacts would be potentially significant.

## Mitigation Measures

For **Impact-TCR-1**:

Implement mitigation measures **MM-CUL-1: Prepare and Implement a Cultural Resources Monitoring and Discovery Plan**; **MM-CUL-2: Prepare and Implement a Cultural Resources**

**Awareness Training Prior to Project Construction**; and **MM-CUL-3: Conduct Archaeological Monitoring** as described in Section 4.5, *Cultural Resources*.

**MM-TCR-1: Conduct Native American Monitoring.** A Kumeyaay Native American monitor shall be present at all areas of proposed ground disturbance during all ~~initial ground disturbance. This monitoring shall occur on an as-needed basis and is intended to ensure that Native American concerns are considered during the construction process.~~ground disturbance. Native American monitors would be retained from tribes who have expressed an interest in the project and have participated in discussions with County DPR. If a tribe has been notified of scheduled construction work and does not respond, or if a Native American monitor is not available, work may continue without the Native American monitor. Roles and responsibilities of the Native American monitors shall be detailed in the Cultural Resources Monitoring and Discovery Plan described in **MM-CUL-1**. Costs associated with Native American monitoring shall be borne by County DPR.

### Level of Significance After Mitigation

Mitigation measures consisting of preparation of a cultural resources monitoring and discovery plan (**MM-CUL-1**), cultural resources awareness training (**MM-CUL-2**), and archaeological (**MM-CUL-3**) and Native American monitoring (**MM-TCR-1**) in previously undisturbed soils would be necessary to reduce impacts to a less-than-significant level. After implementation of mitigation measures, **Impact-TCR-1** would be reduced to a less-than-significant level because the preparation and implementation of a Cultural Resources Monitoring and Discovery Plan and Cultural Resources Awareness Training, as well as archaeological and Native American monitoring of any ground-disturbing activities on designated portions of the project site, would minimize the potential to damage or result in the loss of unknown TCRs. The project's impact on the significance of TCRs as defined in Section 21074 of the PRC and ~~State~~ CEQA Guidelines Section 5021.1 would be less than significant.

## Open Space~~/Preserve~~

### Impact Discussion

Open space~~/preserve~~ uses would remove areas and trails that are presently used by the public for a variety of uses including trail riding, hiking, dirt bike riding, and gatherings that could have the potential to affect undiscovered TCRs. The removal of some of these areas from active use and in turn placing them in open space~~/preserve~~ would protect potentially undiscovered TCRs from impacts.

### Impact Determination

Open space~~/preserve~~ uses would not result in significant impacts on TCRs.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

Impacts would be less than significant.

# 4.18.5 Summary of Significant Impacts

**Table 4.18-1. Summary of Significant Tribal Cultural Resources Impacts and Mitigation Measures**

| Summary of Potentially Significant Impact(s) | Summary of Mitigation Measure(s) | Level of Significance After Mitigation | Rationale for Finding After Mitigation |
|---|---|---|---|
| **Impact-TCR-1: Excavation Related to the Project Would Potentially Damage Tribal Cultural Resources.** ~~Ground-disturbing construction activities associated with the project have the potential to unearth unknown TCRs that may be located in the project area. Impacts would be potentially significant.~~ | **MM-CUL-1: Prepare and Implement a Cultural Resources Monitoring and Discovery Plan**<br>**MM-CUL-2: Prepare and Implement a Cultural Resources Awareness Training Prior to Project Construction**<br>**MM-CUL-3: Conduct Archaeological Monitoring in Areas of Sensitivity**<br>**MM-TCR-1: Conduct Native American Monitoring**<br>~~**MM-TCR-1: Conduct Native American Monitoring.** A Kumeyaay Native American monitor shall be present at all areas of proposed ground disturbance during all initial ground disturbance. This monitoring shall occur on an as-needed basis and is intended to ensure that Native American concerns are considered during the construction process. Native American monitors would be retained from tribes who have expressed an interest in the project and have participated in discussions with County DPR. If a tribe has been notified of scheduled construction work and does not respond, or if a Native American monitor is not available, work may continue without the~~ | Less than Significant | After implementation of mitigation measures **MM-CUL-1** through **MM-CUL-3** and **MM-TCR-1, Impact-TCR-1** would be reduced to a less-than-significant level because the preparation and implementation of a Cultural Resources Monitoring and Discovery Plan and Cultural Resources Awareness Training, as well as archaeological and Native American monitoring of any ground-disturbing activities on designated portions of the project site, would minimize the potential to damage or result in the loss of unknown TCRs. The project's impact on the significance of TCRs as defined in Section 21074 of the PRC and ~~State~~ CEQA Guidelines Section 5021.1 would be less than significant. |

| Summary of Potentially Significant Impact(s) | Summary of Mitigation Measure(s) | Level of Significance After Mitigation | Rationale for Finding After Mitigation |
|---|---|---|---|
| | ~~Native American monitor. Roles and responsibilities of the Native American monitors shall be detailed in the Cultural Resources Monitoring and Discovery Plan described in **MM-CUL-1**. Costs associated with Native American monitoring shall be borne by County DPR.~~ | | |

Section 4.19
# Utilities and Service Systems

## 4.19.1 Overview

This section describes the existing utility and service systems that serve the project site, as well as the applicable regulations that govern their use, supply and distribution, and performance. This section also discusses the project's potential to exceed the existing or planned infrastructure and treatment capacities for utilities and service systems.

## 4.19.2 Existing Conditions

This section describes the geographic setting for the existing utility systems that serve the project study area including water supply, wastewater conveyance and treatment, stormwater conveyance, solid waste generation and disposal, and electrical/natural gas service and availability.

### 4.19.2.1 Water

#### Padre Dam Municipal Water District

The project ~~site~~ is ~~located within~~in the water service ~~area~~boundary of the Padre Dam Municipal Water District (PDMWD). The entirety of PDMWD's potable water supply is imported through the San Diego County Water Authority (SDCWA). SDCWA is one of 24 Metropolitan Water District of Southern California member agencies.

PDMWD currently serves a population over 103,000 persons and provides approximately 38,925 combined water, sewer, and recycled water service connections. ~~The Alpine community constitutes approximately # of those connections. (or a %)~~The 85-square-mile service area is in the eastern section of ~~the county of~~ San Diego County and is divided into two ~~smaller~~ service areas: Western Service Area and Eastern Service Area. The Western Service Area serves potable, wastewater, and recycled water to Santee and parts of El Cajon and the unincorporated community of Lakeside. The unincorporated ~~county~~ communities of Alpine, Blossom Valley, Crest, Dehesa, Flinn Springs, and Harbison Canyon are provided potable water service in the Eastern Service Area. ~~-~~The project is within the Eastern Service Area.

PDMWD's current infrastructure includes approximately 593 miles of water, wastewater, and recycled water pipe; 29 reservoirs; 16 pump stations; four lift stations; a wastewater recycling facility; and additional infrastructure. PDMWD's potable water system consists primarily of water storage facilities with a combined storage capacity of approximately 108.23 million gallons and 393 miles of transmission and distribution water mains (PDMWD 2021). Booster stations are distributed throughout the district area to pump water from lower-pressure zones to higher-pressure zones. Pressure-reducing stations provide the ability to transfer water from higher- to lower-pressure zones to serve customers in different pressure zones.

Future water demand and supply projections are required to be updated every 5 years with the adoption of an Urban Water Management Plan (UWMP). PDMWD's 2015 UWMP project~~ed~~s the estimated demand of potable water resources until the year 2040 based on coordination with various agencies, including SDCWA, which provide~~s~~d imported water availability and regional water demands and conservation, and the San Diego Association of Governments ~~(SANDAG),~~ which provide~~s~~d the most recent demographic projections (~~currently, the~~ 2050 Regional Growth Forecast Update~~;~~ Series 13). Table 4.19-1 shows PDMWD's existing and projected water demand and estimated supply between 2020 and 2040 under normal weather conditions (PDMWD 2016). PDMWD's UWMP is updated every 5 years, at which time the projected supply and demand of potable water resources is reevaluated for the reasonably foreseeable future (i.e., 20-year planning period).

**Table 4.19-1. ~~Padre Dam Municipal Water District –~~ Normal, Single-Year Dry, and Multiple-Year Dry Water Supply and Demand (2020–2040) (acre-feet per year)**

| | 2020 | 2025 | 2030 | 2035 | 2040 |
|---|---|---|---|---|---|
| **Normal Year** | | | | | |
| Supply | 12,535 | 16,049 | 16,230 | 16,641 | 16,816 |
| Demand | 12,535 | 16,049 | 16,230 | 16,641 | 16,816 |
| Difference | 0 | 0 | 0 | 0 | 0 |
| **Single-Year Dry** | | | | | |
| Supply | 13,257 | 16,164 | 16,230 | 16,461 | 16,032 |
| Demand | 12,535 | 16,049 | 16,230 | 16,461 | 16,816 |
| Difference | +722 | +115 | 0 | 0 | -784 |
| **Multiple-Year Dry (First Year)** | | | | | |
| Supply | 13,976 | 16,947 | 16,651 | 16,461 | -- |
| Demand | 12,535 | 16,049 | 16,230 | 16,461 | -- |
| Difference | +1,441 | +898 | +421 | 0 | -- |
| **Multiple-Year Dry (Second Year)** | | | | | |
| Supply | 13,179 | 16,049 | 16,230 | 16,141 | -- |
| Demand | 12,535 | 16,049 | 16,230 | 16,461 | -- |
| Difference | +644 | 0 | 0 | -320 | -- |
| **Multiple-Year Dry (Third Year)** | | | | | |
| Supply | 12,535 | 15,884 | 15,589 | 15,298 | -- |
| Demand | 12,535 | 16,049 | 16,230 | 16,461 | -- |
| Difference | 0 | -165 | -641 | -1,163 | -- |

Source: PDMWD 2016, Tables 7-2, 7-3, and 7-8.
[1] PDMWD's UWMP does not contain multiple-year dry projections for 2040.

As shown in Table 4.19-1, future demand would be met by the supply in each 5-year increment through 2040 under normal year conditions. However, insufficient supplies would be available in 2040 under single-year dry conditions, 2035 under multiple-year dry (second year) conditions, and 2025 through 2035 under multiple-year dry (third year) conditions.

## 4.19.2.2 Wastewater

The Metro Wastewater Joint Powers Authority (JPA) is a ~~s~~State-authorized JPA representing 12 agencies and approximately 800,000 people in the San Diego region. The Metro JPA is a coalition of the municipalities and special districts that share the use of the City of San Diego's wastewater facilities. Its member agencies include the cities of Chula Vista, Coronado, Del Mar, El Cajon, Imperial Beach, La Mesa, National City, and Poway; the Lemon Grove Sanitation District; PDMWD and Otay Water District; and the County ~~of San Diego (~~on behalf of the Winter Gardens Sewer Maintenance District and the Alpine, Lakeside, and Spring Valley Sanitation Districts). The Metro JPA is a partner with the City of San Diego contributing one-third of the wastewater flows and $75,000,000 (fiscal year 2019) a year to the San Diego Metropolitan Wastewater System. The Metropolitan Wastewater System, which is owned and operated by the City of San Diego's Public Utilities Department's Wastewater Branch, provides regional wastewater treatment and disposal services for the San Diego region. The Metropolitan Wastewater System serves 16 cities and wastewater districts with a service area of approximately 450 square miles and service population of approximately 2.2 million (Metro JPA 2019). Wastewater districts are generally responsible for providing collection, transmission, and disposal of sewage. Wastewater districts can be classified as dependent sanitation districts or independent sanitation districts. A dependent sanitation district is formed by resolution of the County ~~of San Diego~~ Board of Supervisors (BOS), while independent sanitation districts have their own independently elected Boards of Directors. Unincorporated areas not serviced by wastewater districts typically use septic systems for wastewater disposal. The most common type of septic system found in San Diego County consists of a septic tank connected to leach lines.

The community of Alpine is served by the San Diego County Sanitation District. This district serves a portion of the Alpine community, the remainder of which (approximately 98%) uses septic systems. ~~[Link this to the paragraph below.]~~

The Alpine Sewer Service Area (SSA), formerly the Alpine Sanitation District, serves the community of Alpine. Based upon a County BOS action in 2011, the Alpine SSA was officially reorganized and annexed into the Spring Valley Sanitation District, which was then renamed the San Diego County Sanitation District. The district provides sewer service to approximately 36,000 customers in the unincorporated ~~areas of the county~~area. The district's sanitary sewer system is composed of approximately 432 miles of sewer lines, 8,200 manholes, eight pump stations, several pressurized force mains, and three wastewater treatment plants (DPW 2021). The Alpine and Lakeside SSAs convey all sewer flows into the City of San Diego Metropolitan Wastewater System, to be treated at ~~the~~ Point Loma Wastewater Treatment Plant (PLWTP). The quality of wastewater discharge at PLWTP is regulated by National Pollutant Discharge Elimination System Permit No. CA0107409. The proposed sewer line option would connect with existing sewer lines within the San Diego County Sanitation District service area.

## 4.19.2.3 Stormwater Drainage

A stormwater conveyance system, as defined by the County ~~of San Diego~~ Watershed Protection, Stormwater Management, and Discharge Control Ordinance, means "private and public drainage facilities other than sanitary sewers within the unincorporated ~~areas of San Diego County~~area by which urban runoff may be conveyed to receiving waters, and includes, but is not limited to, roads, streets, constructed channels, aqueducts, storm drains, pipes, street gutters, inlets to storm drains or pipes, and catch basins." The stormwater conveyance system is designed to prevent flooding by

transporting water away from developed areas. A majority of the unincorporated area ~~of the county~~, including the community of Alpine where the project is located, is rural land that does not support or require stormwater drainage facilities. ~~[And the drainage goes to ?]~~

## 4.19.2.4 Solid Waste

Solid waste generated within the Alpine community is collected by the County's franchised waste hauler (EDCO Waste and Recycling Services) and transported to ~~one of several local landfills.~~ a local landfill. The approved waste hauler is allowed to dispose of municipal solid waste at any of the landfills in San Diego County.

San Diego County has four active landfills that accept solid waste: West Miramar Sanitary, Sycamore Canyon, Otay, and Borrego landfills. Table 4.19-2 shows the landfills' permitted remaining capacities and estimated remaining site life. Remaining landfill capacities are based on design limits specific to each landfill site. Site capacity and the maximum daily permitted rate of disposal specific to each site determine the estimated closure dates.

**Table 4.19-2. Active San Diego County Municipal Solid Waste Landfills**

| Solid Waste Facility | Permitted Remaining Capacity | Maximum Permitted Capacity | Estimated Remaining Site Life |
|---|---|---|---|
| Miramar Landfill | 11,080,871 cubic yards | 97,354,735 | 2031 |
| Sycamore Canyon Landfill | 113,972,637 cubic yards | 147,908,000 | 2042 |
| Otay Landfill | 21,194,008 cubic yards | 61,154,000 | 2030 |
| Borrego Landfill | 111,504 cubic yards | 476,098 | 2046 |

Source: CalRecycle 2021

~~The~~Because the Sycamore Canyon Landfill is closest to the project site and therefore would be the least expensive in terms of transportation costs, it is anticipated that a majority of project-generated solid waste would be disposed of there. However, project-generated solid waste could also be disposed of at Miramar Landfill, Otay Landfill, and/or Borrego Landfill.

Diversion rates are used to report solid waste disposal in ~~the county~~San Diego County and address Assembly Bill (AB) 341 recycling goals, which include statewide requirements to divert at least 75% of its solid waste from landfill disposal through measures such as source reduction, recycling, and composting (see Section 4.19.3, *Applicable Laws and Regulations*). According to the California Department of Resource Recycling and Recovery's (CalRecycle's) 2019 Jurisdiction Diversion/Disposal Rate Summary for San Diego - Unincorporated, the County meets its target population disposal rate of 6.8 pounds per person per day with an annual rate of 5.5 pounds per person per day (CalRecycle 2019a).

## 4.19.2.5 Electricity and Natural Gas

San Diego County is served by San Diego Gas and Electric (SDG&E), which provides electricity and natural gas to over 3.6 million customers (i.e., 1.4 million accounts) in ~~the county~~San Diego County and portions of southern Orange County. The utility has a diverse power production portfolio composed of a variety of renewable and non-renewable sources. Energy production typically varies by season and by year. Regional electricity loads also tend to be higher in the summer because the higher summer temperatures drive increased demand for air-conditioning. In contrast, natural gas

loads are higher in the winter because the colder temperatures drive increased demand for natural gas heating. See Table 4.19-~~3provides~~ 3 for a summary of electricity and natural gas use within the SDG&E service area.

**Table 4.19-3. Electricity and Natural Gas Consumption in the SDG&E Service Area in 2019**

| Sector | Electricity (GWh) | Natural Gas (million therms) |
|---|---|---|
| Agriculture and Water Pump | 355 | 5 |
| Commercial | 10,865 | 200 |
| Industry | 1,342 | 21 |
| Mining and Construction | 395 | 4 |
| Residential | 7,435 | 304 |
| Streetlight | 90 | -- |
| Total | 20,481 | 534 |

Source: CEC 2019a, 2019b.
GWh = gigawatt hours

# 4.19.3 Applicable Laws and Regulations

## 4.19.3.1 State

### ~~Water~~

#### California Water Plan

The California Water Plan, most recently updated in 2018, is prepared by the California Department of Water Resources. The plan provides a framework for water managers, legislators, tribes, agencies, businesses, academia, stakeholders, and the public to consider options and make decisions regarding California's water future. The California Water Plan, which is updated every 5 years, presents basic data and information on California's water resources including water supply evaluations and assessments of agricultural, urban, and environmental water uses~~, in order~~ to quantify ~~potential gaps~~the gap between water supplies and uses.

The California Water Plan also identifies and evaluates existing and proposed statewide demand management and water supply augmentation programs and projects to address the ~~s~~State's water needs. The California Water Plan provides resource management strategies and recommendations to strengthen ~~and help guide~~ integrated regional water management. The resource management strategies help regions meet future demands and sustain the environment, resources, and economy; involve communities in decision-making; and meet various goals. A resource management strategy is a project, program, or policy that helps local agencies and governments manage their water and related resources. These strategies can reduce water demand, improve operational efficiency, increase water supply, improve water quality, practice resource stewardship, and improve flood management. Additionally, the California Water Plan includes a finance plan that identifies critical priorities for ~~s~~State investment in integrated water management activities.

## California Water Code

The California Water Code contains provisions that control almost every consideration of water and its use. Division 2 of the California Water Code provides that the State Water Resources Control Board consider and act upon all applications for permits to appropriate waters. Division 6 of the California Water Code controls conservation, development, and use of the ~~s~~State water resources, while Division 7 addresses water quality protection and management.

## Senate Bill 610

Senate Bill (SB) 610 (Water Code Sections 10910 and 10912) took effect on January 1, 2002. SB 610 seeks to promote more collaborative planning between local water suppliers and cities and counties. It requires that water supply assessments occur early in the land use planning process for all large-scale development projects.[1] The required assessments must include detailed analyses of historic, current, and projected groundwater pumping and an evaluation of the sufficiency of the groundwater basin to sustain a new project's demands. It also requires an identification of existing water entitlements, rights, and contracts and a quantification of the prior year's water deliveries.

## Senate Bill 221

Enacted in 2001, SB 221, which has been codified in the California Water Code beginning with Section 10910, requires that the legislative body of a city or county 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. SB 221 requirements do not apply to the general plans of cities and counties, but rather to specific development projects.

## California Urban Water Management Act

The California Urban Water Management Planning Act requires urban water suppliers to prepare and adopt an ~~Urban Water Management Plan (UMWP)~~UWMP every 5 years. The main goal of the UWMP is to forecast future water demands and water supplies under average and dry-year

[1] In accordance with the 2014 CEQA Statute and Guidelines Section 15155, a project is considered to be a "water-demand project" if one of the following definitions applies:

(a) A residential development of more than 500 dwelling units.
(b) A shopping center or business establishment employing more than 1,000 persons or having more than 500,000 square feet of floor space.
(c) A commercial office building employing more than 1,000 persons or having more than 250,000 square feet of floor space.
(d) A hotel or motel, or both, having more than 500 rooms.
(e) An industrial, manufacturing, or processing plant, or industrial park planned to house more than 1,000 persons, occupying more than 40 acres of land, or having more than 650,000 square feet of floor area.
(f) A mixed-use project that includes one or more of the projects specified in subdivisions (a)(1)(A), (a)(1)(B), (a)(1)(C), (a)(1)(D), (a)(1)(E), and (a)(1)(G) of this section.
(g) A project that would demand an amount of water equivalent to, or greater than, the amount of water required by a 500-dwelling-unit project.

conditions, identify future water supply projects such as recycled water, provide a summary of water conservation best management practices, and provide a single- and multiple-dry year management strategy.

### Sustainable Groundwater Management Act of 2014

On September 16, 2014, the Governor signed three bills—AB 1739, SB 1168, and SB 1319, collectively referred to as the Sustainable Groundwater Management Act of 2014—to create a framework for sustainable, local groundwater management. The legislation allows local agencies to tailor sustainable groundwater plans to their regional economic and environmental needs. The bills establish a definition of sustainable groundwater management and require local agencies to adopt management plans for the ~~s~~State's most important groundwater basins. The legislation prioritizes groundwater basins that are currently over-drafted and sets a timeline for implementation:

- By 2017, local groundwater management agencies must be identified.
- By 2020, over-drafted groundwater basins must have sustainability plans.
- By 2022, other high- and medium-priority basins not currently in overdraft must have sustainability plans.
- By 2040, all high- and medium-priority groundwater basins must achieve sustainability.

Additionally, the legislation provides measurable objectives and milestones to reach sustainability and a ~~s~~State role of limited intervention when local agencies fail to adopt sustainable management plans. Local water agencies and the County will work together to ensure compliance with this legislation.

### Water Conservation Act

The Water Conservation Act of 2009 (Senate Bill X7-7) was enacted in California in November 2009 and requires that all water suppliers increase their water use efficiency. The act mandates water conservation, measurement, and reporting activities for urban and agricultural water suppliers. The Water Conservation Act requires the ~~s~~State to reduce urban water consumption by 20% by the year 2020. In addition, urban and agricultural water providers are encouraged to report the data to the Department of Water Resources.

## ~~Solid Waste~~

### California Integrated Waste Management Act

In response to reduced landfill capacity, the State ~~of California~~ passed the California Integrated Waste Management Act in 1989. This legislation (generally known by the name of its enacting bill, AB 939) requires cities and counties to reduce the amount of solid waste entering existing landfills through recycling, reuse, and waste-prevention efforts. The purpose of AB 939 is to "reduce, recycle, and re-use solid waste generated in the ~~s~~State to the maximum extent feasible." AB 939 requires jurisdictions to use "integrated waste management"—a variety of waste management practices to safely and effectively handle the municipal solid waste stream with the least adverse impact on human health and the environment.

When first enacted, AB 939 required every city and county in the ~~s~~State to prepare a Source Reduction and Recycling Element in its Solid Waste Management Plan to identify how each

jurisdiction planned to meet mandatory ~~s~~State waste diversion goals of 25% by the year 1995 and 50% by the year 2000. AB 939 also established the California Integrated Waste Management Board, the ~~s~~State agency designated to oversee, manage, and track California's solid waste generation each year.

In order to further the goals of AB 939, statewide strategies to achieve a 75% reduction goal by 2020 were established with the adoption of AB 341 in May 2012. As stated in the legislative text of AB 341, it is the policy goal of the ~~s~~State that not less than 75% of solid waste generated be source reduced, recycled, or composted by the year 2020, and annually thereafter (Public Resources Code Section 41780.01(a)). AB 341 also establishes the statewide mandatory commercial recycling program, which requires businesses that generate 4 cubic yards or more of commercial solid waste per week, or multi-family residential dwellings of five units or more, to implement recycling practices during operation to help achieve the statewide diversion goal of 75%.

## 4.19.3.2 Regional

## ~~4.19.3.2~~4.19.1.1 ~~Local~~

### San Diego County Water Authority Regional Water Facilities Master Plan

The Regional Water Facilities Master Plan evaluates the ability of SDCWA to continue to meet its mission of a safe and reliable water supply to its member agencies by recommending additional regional facilities and improvements to existing facilities to cost-effectively meet SDCWA's mission through the planning horizon. The SDCWA 2013 master plan encompasses a region-wide planning effort incorporating three interrelated components: water demands, water supplies, and facilities. Facility planning begins with estimating future water demands, proceeds to the identification of water supplies and their reliability, and then defines facilities needed to treat and transport the supplies to the points of demand. This planning process is iterative in nature, and computer simulations are employed to model facility alternatives that supplement SDCWA's current water delivery and storage system. The updated master plan follows the same master planning principles as the 2002 plan and defines SDCWA's overall capital improvement process and budget while ensuring maintenance of reliable water supply infrastructure through 2035.

### San Diego Integrated Regional Water Management Plan

The 2019 San Diego Integrated Regional Water Management Plan provides a mechanism for~~:~~ (1) coordinating, refining, and integrating existing planning efforts within a comprehensive, regional context; (2) identifying specific regional and watershed-based priorities for implementation projects; and (3) providing funding support for the plans, programs, projects, and priorities of existing agencies and stakeholders. The 2019 plan includes information from planning documents and from planning studies, workshops, and workgroups conducted to address region-specific issues. The plan allows regional stakeholders to revisit the plan's goals, objectives, and priorities. The goals are as follows:

1. Improve the reliability and sustainability of regional water supplies.
2. Protect and enhance water quality.
3. Protect and enhance our watersheds and natural resources.

4. Enhance resiliency to climate change for local water resources.
5. Promote and support sustainable integrated water resource management.

In order to achieve the goals, the following ten objectives have been adopted:

1. Encourage the development of integrated solutions to address water management issues and conflicts.
2. Maximize stakeholder and community involvement and stewardship of water resources, emphasizing education and outreach.
3. Effectively obtain, manage, and assess water resources data and information.
4. Further ~~the~~ scientific and technical foundation~~s~~ of water management.
5. Develop and maintain a diverse mix of water resources, encouraging their efficient use and development of local water supplies.
6. Construct, operate, and maintain a reliable and resilient infrastructure system.
7. Enhance natural hydrologic processes to reduce the effects of hydromodification and encourage integrated flood management.
8. Effectively reduce sources of pollutants and environmental stressors to protect and enhance human health, safety, and the environment.
9. Protect, restore, and maintain habitat and open space.
10. Advance water-based enriching experiences.

### Padre Dam Municipal Water District Urban Water Management Plan

The California Urban Water Management Planning Act requires that each urban water supplier providing water for municipal purposes to more than 3,000 customers, or supplying more than 3,000 acre-feet of water annually, must prepare, update, and adopt a UWMP at least once every 5 years. This law applies to PDMWD. The intent of an UWMP is to present information on water supply, water usage, recycled water, and water use efficiency programs in a respective water district's service area. A UWMP also serves as a resource for planners and policy makers over a 25-year timeframe. PDMWD updates its demand forecasts and supply needs based on the most recent San Diego Association of Governments forecast approximately every 5 years. The most current supply and demand projections are contained in the 2015 UWMP, which was adopted in October 2016. The 2015 UWMP states that all future water demands will have available water supplies for the predicted service areas during a normal water year scenario; however, water shortages are identified during single-dry-year and multiple-dry-year scenarios.

## 4.19.3.3 Local

### County of San Diego General Plan Policies

The general plan includes goals and policies applicable to utilities and service systems within the Land Use, Housing, and Conservation and Open Space elements.

## Land Use Element

**Goal LU-6** is for a development-environmental balance and is accomplished by policies LU-6.5 and LU-6.9, which ensure that development minimizes the use of impervious surfaces and incorporates other low-impact development techniques as well as a combination of site design, source control, and stormwater best management practices; and require development to conform to the natural topography.

**Goal LU-8** applies to aquifers and groundwater conservation and is accomplished through policies LU-8.1 and LU-8.2, which require land use densities in groundwater-dependent areas to be consistent with the long-term sustainability of groundwater supplies and require development to identify adequate groundwater resources in groundwater-dependent areas.

**Goal LU-13** applies to adequate water quality, supply, and protection and is accomplished by policies LU-13.1 and LU-13.2, which coordinate water infrastructure planning with land use planning to maintain an acceptable availability of a high-quality, sustainable water supply and require new development to identify adequate water resources.

**Goal LU-14** applies to adequate wastewater facilities and is accomplished through policies LU-14.1 through LU-14.4, which require coordination with wastewater agencies and districts during the preparation or update of wastewater facility master plans and/or capital improvement plans to provide adequate capacity and ensure consistency with the County's land use plans; require that development provide for the adequate disposal of wastewater concurrent with the development and that the infrastructure is designed and sized appropriately to meet reasonably expected demands; and require wastewater treatment facilities serving more than one private property owner to be operated and maintained by a public agency. In addition, the policies prohibit sewer facilities that would induce unplanned growth.

## Conservation and Open Space Element

Conservation and Open Space Element goal COS-4 is in regard to water management and is a balanced and regionally integrated water management approach to achieve the long-term viability of the ~~county's~~unincorporated area's water quality and supply. This is accomplished through policies COS-4.1 through COS-4.4, which maximize stormwater filtration and/or infiltration in areas that are not subject to high groundwater by maximizing the natural drainage patterns and the retention of natural vegetation and other pervious surfaces; require development to reduce the waste of potable water through use of efficient technologies and conservation efforts; require efficient irrigation systems; maximize stormwater filtration and/or infiltration in areas that are not subject to high groundwater by maximizing the natural drainage patterns and the retention of natural vegetation and other pervious surfaces; and require land uses with a high potential to contaminate groundwater to take appropriate measures to protect water supply sources.

**Goal COS-5** is for the protection and maintenance of water resources and is accomplished through policies COS-5.2 and COS-5.5, which require development to minimize the use of directly connected impervious surfaces and to retain stormwater runoff caused from the development footprint at or near the site of generation, and require development projects to avoid impacts on the water quality in local reservoirs, groundwater resources, and recharge areas; watersheds; and other local water sources.

**Goal COS-14** is for sustainable land development and is accomplished through policy COS-14.7, which encourages development projects that use energy recovery, photovoltaic, and wind energy.

**Goal COS-15** is for sustainable architecture and buildings and is accomplished through policies COS-15.1 through COS-15.5, which require that new buildings be designed and constructed in accordance with "green building" programs that incorporate techniques and materials that maximize energy efficiency; promote and develop standards for the retrofit of existing buildings to incorporate architectural features, heating and cooling, water, energy, and other design elements that improve their environmental sustainability and reduce greenhouse gases; require all new County facilities and the renovation and expansion of existing County buildings to meet identified "green building" programs; require new development to reduce the energy impacts from new buildings; and encourage energy conservation and efficiency in existing development through energy efficiency audits and adoption of energy saving measures.

**Goal COS-17** applies to sustainable solid waste management and is accomplished through policies COS-17.1 through COS-17.8, which reduce greenhouse gas emissions and future landfill capacity needs through reduction, reuse, or recycling of all types of solid waste that is generated; require recycling, reduction, and reuse of construction and demolition debris; require landfills to use waste management and disposal techniques; encourage composting throughout the ~~county~~unincorporated area; require that all new land development projects include space for recycling containers; improve ~~the county's~~San Diego County's rate of recycling by expanding solid waste recycling programs; and continue programs to educate industry and the public regarding the need and methods for waste reduction, recycling, and reuse.

# 4.19.4 Project Impact Analysis

## 4.19.4.1 Methodology

Impacts on utilities (wastewater, water, stormwater, solid waste, and electricity) that are possible with project implementation were assessed using varying methods depending on the utility service, and generally include a comparison of the project-related demand against existing supply and storage capacities. Any need for physical improvements to the existing infrastructure would be considered part of the project, and any potential impacts from these improvements are evaluated within this section and the other applicable resource sections. Sources of demand for utilities at the project site include temporary employees for construction of the project, long-term employees during project operations, and project operations in general. Specific methods for analyzing each utility service are provided below.

### Wastewater

Impact assessments of wastewater systems or sewers generally include a comparison of the project-related wastewater flow generation to the existing and projected wastewater treatment capacity of the treatment plant serving the site, in this case the PLWTP, as well as the capacity of onsite or offsite wastewater infrastructure. The analysis then considers whether the construction of new or expanded wastewater facilities could cause significant environmental effects. Table 4.19-4 provides the projected wastewater demand for the project using generation rates identified in the Alpine SSA and Lakeside SSA Sewer Master Plan Update (Atkins 2011). Generation rates used are based on

institutional land use as a conservative approach to develop an estimated amount of wastewater that would be produced as a result of implementing the project.

**Table 4.19-4. Projected Wastewater Demand for the Project**

| Land Use | Acres | Wastewater Generation Rate (gallons/acre/day) | Projected Wastewater Demand (gallons/day) |
|---|---|---|---|
| Landscape | 17.1 | 500 | 8,550 |
| ~~Concession Building~~ | ~~0.03~~ | ~~500~~ | ~~15~~ |
| Admin/Multi-Use Building | 0.05 | 500 | 25 |
| Restrooms | 0.05 | 500 | 25 |
| Recreational Vehicle Host Site | 0.03 | 500 | 15 |
| Total | | | 8,~~630~~615 |
| Annual Total | | | 3,~~149,950~~144,475 |

~~Source: Prowant pers. comm.;~~Source: Atkins 2011.

## Water

Impacts on existing water systems generally include a comparison of the project-related water demand as it relates to available supply and the sufficiency of the existing water infrastructure to support that demand. As mentioned, California Water Code Section 10910 requires city and county lead agencies to request that water purveyors prepare water supply assessments for certain projects subject to CEQA.

The future water demand for the project, including the proposed administration, volunteer pad, and public restrooms, water fountains, irrigation, volunteer pad, and administrative building, were developed by project contractors based on landscaping areas and number of restrooms provided by County DPR. Table 4.19-5 provides the projected ~~daily and~~ annual water demand for the project.

**Table 4.19-5. Projected Water Demand for the Project**

| Land Use | Square Fee~~d~~t | Water Use (gallons/year) |
|---|---|---|
| Landscape Irrigation | 744,961 | 13,846,272.8 |
| Admin/Rec building | 2,000 | 200,000 |
| Restrooms | 2,000 | 1,588,500 |
| Recreational Vehicle Host Site | 1,200 | 36,500 |
| Community Garden | 5,000 | 800,000 |
| Total | | 16,471,272.8 |

~~Source: Prowant pers. comm..~~
Source: Atkins 2011.

## Solid Waste

Impacts associated with solid waste generally involve an estimation of construction- and operations-related solid waste generation compared to the capacity of the landfills serving the project area. The existing solid waste generation for the project was calculated based on waste generation rates from the California Integrated Waste Management Board. Solid waste projections for components of the project were calculated based on waste generation rates for various types of uses identified by the California Integrated Waste Management Board (CalRecycle 2019b).

Summaries of the projected daily solid waste generation for the project components are provided in Table 4.19-6.

**Table 4.19-6. Projected Daily Solid Waste for the Project**

| Project Component | Use | Square Footage | Generation Rate | Amount of Waste (pounds/day) |
|---|---|---|---|---|
| Volunteer pad | Hotel | 1 volunteer pad | 2 pounds/space/day | 2 |
| Admin/Rec building | Public/ Institutional | 2,000 | 0.007 pound/square foot/day | 14 |
| Restrooms | Public/ Institutional | 2,000 | 0.007 pound/square foot/day | 14 |
| ~~Concession Building~~ | ~~Public/ Institutional~~ | ~~1,500~~ | ~~0.007 pound/square foot/day~~ | ~~10.5~~ |
| Dog Park | | 108,900 | 0.007 pound/square foot/day | 762.3 |
| Equestrian Staging | | 20,000 | 0.007 pound/square foot/day | 140 |
| Bike ~~Park~~Skills Area | | 20,000 | 0.007 pound/square foot/day | 140 |
| ~~Skate~~All-Wheel Park | | 20,000 | 0.007 pound/square foot/day | 140 |
| Sports Fields (including baseball, ~~soccer/~~multi-use, softball, tennis court, and basketball court) | | 253,900 | 0.007 pound/square foot/day | 1,777.3 |
| Total Projected Pounds/Day | | | | ~~3,000.1~~2,849.6 |

# 4.19.4.2 Thresholds of Significance

## Appendix G of the ~~State~~ CEQA Guidelines

For the purposes of the analysis in this Final EIR, and in accordance with Appendix G of the~~ State~~ CEQA Guidelines, significant environmental impacts are assessed by determining if the project would:

1. Require or result in the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects.
2. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years.
3. Result in a determination by the wastewater treatment provider that serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments.
4. Generate solid waste in excess of ~~s~~State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals.

5. Comply with federal, ~~s~~State, and local management and reduction statutes and regulations related to solid waste.

## County of San Diego Guidelines for Determining Significance

The County ~~of San Diego~~ does not have specific guidelines for determining significance for utilities and service system impacts.

# 4.19.4.3 Project Impacts and Mitigation Measures

***Threshold 1: Implementation of the project would require or result in the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects.***

## County Park and Trails

### Impact Discussion

#### Water

##### *Construction*

Construction of the project would involve the development of an approximately 25-acre active park in an undeveloped area. Water would be required during construction of the project for activities such as dust suppression, the mixing of concrete, light washing of equipment and tools consistent with water quality regulations, and for drinking water for construction workers. Water usage during construction would be temporary and could be used for dust suppression, equipment washing, and other activities. PDMWD's UWMP does not include assumptions for construction water use.

##### *Operation*

Implementation of the project would introduce ~~an onsite ranger, two~~a live-on volunteer, maintenance staff, and a ~~volunteer~~park ranger to help with maintenance and management of the property along with visitors and local residents to the project site, which would result in an additional water demand. Water service is currently not provided to the existing site. As such, the project would be connected to water conveyances within South Grade Road and increased demand on existing water conveyance facilities that would serve future development would occur. A detailed analysis of impacts of the project on water supply is provided below in Threshold 2.

Water demand would increase as a result of new uses including restrooms, drinking fountains, volunteer facilities, and other recreational and visitor-serving uses including the administrative/ multi-purpose room. To accommodate the additional water demand, new or expanded water conveyance infrastructure (i.e., new, upgraded, relocated, or expanded water lines into the project site) would potentially be installed. A water study would be required to confirm water infrastructure would have sufficient capacity to convey water to the project site. Installation of new or expanded water pipelines to serve specific future development could result in impacts associated with ground-disturbing activities (**Impact-UTIL-1**). Therefore, the project would potentially require

or result in relocation or construction of new or expanded water facilities, the construction or relocation of which could cause significant effects.

### Wastewater

An onsite connection to an existing sewer line is one of the two options available for sewage disposal at the proposed site. This option would consist of connecting to the existing sewer line within Tavern Road, west of the project site, or the existing sewer line within the northern portion of South Grade Road near the intersection with Alpine Boulevard. The existing sewer line is served by the San Diego County Sanitation District. Wastewater would be processed and sanitized at the PLWTP. As discussed under Section 4.19.2.2, *Wastewater,* the PLWTP currently meets the wastewater discharge requirements of its National Pollutant Discharge Elimination System Permit. Wastewater treatment requirements for the project would be based on all applicable ~~s~~State and federal regulations and policies including the National Pollutant Discharge Elimination System Permit and would include limitations on effluent discharge and receiving water. In general, effluent discharge requirements include specifications for adequate disinfection treatment and limitations on radioactivity, pollutant concentrations, sediments, pH, temperature, and toxicity.

The onsite sewer treatment system is the second option for disposal of sewage associated with the project. The system would be in the northern portion of the project site, north of the equestrian staging area. Two septic tanks are proposed, one of which would be near the restroom in the southern portion of the project site with a capacity of 1,500 gallons and a main tank near the restroom in the northern portion of the project site with a capacity of 15,000 gallons. It is anticipated that the proposed septic system would have a capacity of 5,000 gallons per day. Implementation of an onsite sewer treatment system would not require or result in the relocation or construction of new or expanded wastewater treatment facilities.

#### *Construction*

Construction of the project would involve excavation and grading, filling and compaction, and construction of above-ground amenities and buildings. Construction of the project is anticipated to require a daily maximum of approximately 36 construction workers on the site. During construction, it is anticipated that portable temporary restroom facilities would be brought to the site for construction workers. Wastewater generated at the portable restroom facilities would not be disposed of at the project site but would be hauled away and disposed of at an appropriate facility in accordance with Regional Water Quality Control Board regulations. No wastewater treatment facilities, infrastructure improvements, or other expansions would be required as a result of project construction.

#### *Operation*

Operation of the project components would generate wastewater consistent with that of ~~typical~~ public recreational facility uses. During project operations, wastewater generation at the project site would increase from existing conditions because the project site is currently undeveloped. The additional projected wastewater generated as a result of implementation of the project is approximately 8,~~630~~615 gallons per day. The PLWTP has a daily wastewater treatment capacity of 240 million gallons per day (mgd) and a peak wet-weather capacity of 432 mgd. In 2015, the measured wastewater collected was 136.2 mgd, which leaves an available capacity of approximately 104 mgd if this trend continues. The additional generation of 8,~~630~~615 gallons per day of wastewater associated with the project represents 0.000062% of the PLWTP's remaining annual

treatment capacity, which is an insubstantial amount relative to the remaining treatment capacity. Therefore, the projected wastewater generated with implementation of the project would not exceed the capacity of the PLWTP and no wastewater treatment facilities, infrastructure improvements, or other expansions would be required as a result of project construction.

### Stormwater Facilities

The project would result in an increase of 7.8 acres in impervious surfaces compared to existing conditions. However, project components including stormwater retention basins, landscaped areas, and berms would infiltrate and capture runoff such that an increase in impervious surfaces would not require new or expanded stormwater facilities. Similar to existing conditions, stormwater runoff would continue to infiltrate the pervious surfaces. The project would not require new or expanded stormwater facilities, the construction of which could result in physical impacts on the environment.

### Electricity, Natural Gas, and Telecommunications Facilities

The project would result in an incremental increase in electricity demand. It is anticipated that construction and operation of the project would require new points of connection for electricity from the existing utility lines. All existing utilities that the project would connect to are adequately sized to serve the project without the need to expand. Photovoltaic panels would be installed in the parking lots for lighting throughout the proposed park. Furthermore, the project site and surrounding areas are currently served by existing utility infrastructure. The project would not require the use of natural gas or telecommunications service. The project would not extend any utility or service system into undeveloped areas that are currently unserved by utilities.

### Impact Determination

**Impact-UTIL-1: Operation of the Project Has the Potential to Require New or Expanded Water Facilities**. Operation of the project would increase demand on water infrastructure serving the project site, potentially requiring the relocation or construction of new or expanded water facilities to serve proposed uses. Construction of these facilities could result in physical impacts on the environment. Therefore, impacts are considered to be significant.

### Mitigation Measures

For **Impact-UTIL-1**:

> **MM-UTIL-1: Complete Water Study to Assess Water Infrastructure Capacity.** Prior to issuance of a building permit, County DPR shall coordinate with PDMWD to assess the capacity of existing water infrastructure that would serve the project site and, if it is determined that insufficient capacity exists to serve the project, the project proponent shall implement the necessary improvements prior to operation of the project, as determined by PDMWD. Should it be determined that the project would result in the need for new or expanded water facilities, the project proponent shall analyze the potential environmental effects of the improvements in accordance with CEQA.

### Level of Significance After Mitigation

Implementation of **MM-UTIL-1** would require County DPR to conduct a water study to assess the capacity of existing water facilities, and, in the event insufficient capacity exists to serve the project,

requires County DPR to construct the necessary improvements prior to issuance of a building permit. Implementation of **MM-UTIL-1** would ensure construction of sufficient water infrastructure; therefore, **Impact-UTIL-1** would be reduced to a less-than-significant level.

## Open Space~~/Preserve~~

### Impact Discussion

The proposed open space~~/preserve~~ component would not result in the generation of any water, wastewater, stormwater, electricity, or telecommunication demands. The approximately 70 acres of the project site would remain undeveloped, similar to existing conditions. Therefore, implementation of the proposed open space~~/preserve~~ component would not require or result in the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects.

### Impact Determination

Implementation of the proposed open space~~/preserve~~ component would not require or result in the relocation or construction of new or expanded water, wastewater treatment, stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects. No impacts would occur.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

No impact would occur.

***Threshold 2: Implementation of the project would have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years.***

## County Park and Trails

### Impact Discussion

#### Construction

Water would be required during construction of the project for activities such as dust suppression, the mixing of concrete, light washing of equipment and tools consistent with water quality regulations, and construction worker water usage. During construction this usage would be temporary, and could be used for dust suppression, equipment washing, and other activities.

#### Operation

Implementation of the project would introduce ~~an onsite ranger, two~~a live-on volunteer, maintenance staff, and a ~~volunteer~~park ranger to help with maintenance and management of the

property along with visitors and local residents to the project site, which would require an additional 50.5 acre-feet per year of water. The total water demands associated with the project were not included in UWMPs previously prepared for PDMWD. In addition, the total water demands have not been specifically included in SDCWA's 2015 UWMP. County DPR received a water availability letter from PDMWD that confirmed water demands associated with the project would be met. However, a water supply assessment would be required to ~~conclude~~confirm PDMWD would be able to provide adequate water supplies for operation of the proposed park during the life of the park and/or identify needed improvements that would allow the water system to supply the project. (PDMWD 2021).

As noted, the project would require an additional 50.5 acre-feet per year of water. Water use would be reduced through water conservation measures. PDMWD would continue to implement existing water conservation measures identified in its UWMP, as required by the Water Conservation Act of 2020. The project would incorporate water-efficient design measures, including drought-tolerant landscaping, into the project design to help reduce overall water demands within the PDMWD service area. Landscape design would include the installation of drought-tolerant native plants to reduce water demands for irrigation. Furthermore, water demand for irrigation would decrease over time as vegetation root systems are established.

Although water conservation measures would be included in project design, sufficient water supplies would need to be confirmed by PDMWD prior to issuance of a building permit. A water supply assessment would be required to conclude PDMWD would be able to provide adequate water supplies for operation of the proposed park during the life of the park. The project would potentially result in a substantial increase in water demand that may exceed the water supplies available from existing entitlements and resources (**Impact-UTIL-2**). Therefore, the project would potentially have insufficient water supplies available from PDMWD to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years.

## Impact Determination

**Impact-UTIL-2: Insufficient Water Supplies Available to Serve the Project During Operation**. Due to the potential increase in water demand as a result of implementation of the project, PDMWD cannot guarantee that at some point in the future, supply of imported water would not be diminished. Therefore, given this uncertainty regarding available water supply, which is necessary for operation of the project, potential impacts are considered to be significant.

## Mitigation Measures

For **Impact-UTIL-2**:

> **MM-UTIL-2**: **Confirm Water Supply Availability for Development of the Project Prior to Issuance of Building Permits.** Water availability shall be confirmed prior to issuance of building permits. The confirmation of water availability by PDMWD shall be provided in written form by PDMWD.

## Level of Significance After Mitigation

Implementation of **MM-UTIL-2** would ensure coordination with PDMWD, and implementation of **MM-UTIL-2** would ensure sufficient water supplies are available prior to construction. Therefore,

**Impact-UTIL-2** would be reduced to a less-than-significant level by requiring confirmation of water availability.

## Open Space~~/Preserve~~

### Impact Discussion

The proposed open space~~/preserve~~ component would not require the use of any water. The approximately 70 acres of the project site would remain undeveloped, similar to existing conditions. Therefore, implementation of the proposed open space~~/preserve~~ component would have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years.

### Impact Determination

Implementation of the proposed open space~~/preserve~~ component would have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years. No impacts would occur.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

No impact would occur.

***Threshold 3: Implementation of the project would result in a determination by the wastewater treatment provider that serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments.***

## County Park and Trails

### Impact Discussion

#### Construction

Construction of the project would involve excavation and grading, filling and compaction, utility installation, and construction of above-ground amenities and buildings. Construction of the project is anticipated to require a daily maximum of approximately 36 construction workers on the site. During construction, it is anticipated that portable temporary restroom facilities would be brought to the site for construction workers. Wastewater generated at the portable restroom facilities would be hauled away to an authorized sanitation cleaning facility that would treat the waste safely and sanitarily. Waste would be removed in accordance with Regional Water Quality Control Board regulations. Construction of the project is not anticipated to generate substantial amounts of wastewater. Therefore, wastewater treatment providers would have sufficient capacity to serve the project during construction.

#### Operation

Operation of the project would increase wastewater generation at the site from existing conditions. Implementation of the project would result in an additional 8,~~630~~615 gallons per day of wastewater from the introduction of new visitors to the recreation facility. As previously discussed, the additional generation of 8,~~630~~615 gallons per day represents 0.000062% of the PLWTP's remaining annual treatment capacity, which is an insubstantial amount relative to the remaining treatment capacity. Therefore, the project's projected wastewater generation would not exceed the capacity of the PLWTP. Because wastewater generated by the project would be treated within the permitted capacity of the PLWTP, wastewater treatment providers would have sufficient capacity to serve the project during operations.

### Impact Determination

Implementation of the project would not result in a determination by the wastewater treatment provider that serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments. Impacts would be less than significant.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

Impacts would be less than significant.

## Open Space~~/Preserve~~

### Impact Discussion

The proposed open space~~/preserve~~ component would not result in the generation of wastewater. The approximately 70 acres of the project site would remain undeveloped, similar to existing conditions. Therefore, wastewater treatment providers would have sufficient capacity to serve the project following implementation of the proposed open space~~/preserve~~ component.

### Impact Determination

Implementation of the proposed open space~~/preserve~~ component would not result in a determination by the wastewater treatment provider that serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments. No impacts would occur.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

No impact would occur.

***Threshold 4: Implementation of the project would not generate solid waste in excess of ~~s~~State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals.***

## County Park and Trails and Open Space~~/Preserve~~

### Impact Discussion

#### Construction

No demolition would occur during construction of the project. Construction of the project would occur over a 16-month period and has the potential to generate solid waste, including wood, cardboard, metals, plastics, concrete, and other building materials. Specific amounts of construction solid waste are unavailable. However, construction of the project would be required to comply with applicable waste diversion requirements, including AB 939, which mandates that projects requiring building permits pay a refundable waste diversion deposit and divert at least 50% of their debris by recycling, reusing, or donating usable materials. Compliance with these applicable regulations would ensure that solid waste generated by construction activities occurring under the project would not be in excess of ~~s~~State or local standards.

Therefore, because a substantial majority of the construction materials would be recycled or reused instead of being disposed of in a local landfill, and the local landfill has available capacity for the remaining solid waste, the project would not generate solid waste in excess of ~~s~~State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals.

#### Operation

Diversion rates are used to report solid waste disposal in ~~the county~~San Diego County and to address AB 939 recycling goals, which require each county in the ~~s~~State to divert at least 50% of its solid waste from landfill disposal through measures such as source reduction, recycling, and composting (see Section 4.19.3, *Applicable Laws and Regulations*). CalRecycle replaced the California Integrated Waste Management Board as the department in charge of reviewing a jurisdiction's progress in meeting the Integrated Waste Management Act requirements. According to CalRecycle's 2019 Jurisdiction Diversion/Disposal Rate Summary for San Diego - Unincorporated, the County meets its target population disposal rate of 6.8 pounds per person per day with an annual rate of 5.5 pounds per person per day (CalRecycle 2019a).

State law AB 939 requires that local county agencies must prepare and implement Integrated Waste Management Plans, which must include a Siting Element (California Legislative Information 2020). The Siting Element must include a projection of the amount of disposal capacity needed to accommodate the solid waste generated within the local jurisdiction for a 15-year period. The San Diego County Integrated Waste Management Plan Countywide Summary Plan contains the Countywide Siting Element, which outlines a combination of strategies including existing, proposed, and tentative landfills or expansions; increased diversion efforts; and out-of-county transport of solid waste to serve all jurisdictions in ~~the county~~San Diego County for at least 15 years of disposal capacity. The August 2017 Five-Year Review Report, approved by CalRecycle in 2018, updated the

planning for 15 years of countywide landfill disposal capacity (CalRecycle 2019b). The Five-Year Review Report provides estimates for available landfill capacity within San Diego County for the ~~s~~State-mandated 15-year period, with the last permitted landfill in ~~the county~~San Diego County projected to close in 2059. The Five-Year Review Report indicates, given several different possible scenarios, ~~the County of~~ San Diego County has sufficient landfill capacity to accommodate disposal for the next 15 years. Given this conclusion, there would be sufficient capacity at a permitted landfill in the region for disposal of solid waste generated by the project in the 15-year timeframe.

Once operational, the project would result in a generation of approximately 1,~~095.036.5~~040,104 pounds, or ~~590.3~~613.6 cubic yards, of solid waste per year. Sycamore Canyon Landfill is closest to the project site and, as shown in Table 4.19-2, has a permitted remaining capacity of 113,972,637 cubic yards. The project's annual operational contribution of solid waste would be 0.009% of the landfill's remaining capacity. This represents a conservative estimate because all project components would be required to comply with applicable waste diversion requirements. Furthermore, the project would comply with 2011 General Plan Update policies that would further reduce the potential for the project to generate solid waste in excess of standards or capacity by requiring new infrastructure, facilities, and services prior to development; diversion of solid waste from landfills; and siting of new solid waste management facilities in a manner that minimizes environmental impacts and encourages composting.

As such, Sycamore Canyon Landfill could sufficiently accommodate solid waste generated under the project. Therefore, implementation of the project would not generate solid waste in excess of ~~s~~State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals.

### Impact Determination

Implementation of the project would not generate solid waste in excess of ~~s~~State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. Impacts would be less than significant.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

Impacts would be less than significant.

***Threshold 5: Implementation of the project would comply with federal, ~~s~~State, and local management and reduction statutes and regulations related to solid waste.***

## County Park~~ and~~, Trails, and Open Space~~/Preserve~~

### Impact Discussion

No demolition would occur during construction of the project. Therefore, construction activities associated with the project would not result in generation of solid waste. As noted above under

Threshold 4, diversion rates are used to report solid waste disposal and to address AB 939 recycling goals. As discussed above, the County meets its target population disposal rate of 6.8 pounds per person per day with an annual rate of 5.5 pounds per person per day (CalRecycle 2019a). Operation of the project would be required to continue to comply with AB 939. Therefore, operation of the project would comply with federal, ~~s~~State, and local management and reduction statutes and regulations related to solid waste.

### Impact Determination

Construction and operation of the project components would not conflict with federal, ~~s~~State, and local management and reduction statutes and regulations related to solid waste. Impacts would be less than significant.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

Impacts would be less than significant.

## 4.19.5 Summary of Significant Impacts

**Table 4.19-7. Summary of Significant Utilities and Service Systems Impacts and Mitigation Measures**

| Summary of Potentially Significant Impact(s) | Summary of Mitigation Measure(s) | Level of Significance After Mitigation | Rationale for Finding After Mitigation |
|---|---|---|---|
| **Impact-UTIL-1: Operation of the Project Has the Potential to Require New or Expanded Water Facilities**~~.~~ ~~Operation of the project would increase demand on water infrastructure serving the project site, potentially requiring the relocation or construction of new or expanded water facilities to serve proposed uses. Construction of~~ | ~~**MM-UTIL-1: Complete Water Study to Assess Water Infrastructure Capacity. Prior to issuance of a building permit, County DPR shall coordinate with PDMWD to assess the capacity of existing water infrastructure that would serve the project site and, if it is determined that insufficient capacity exists to serve the project, the project proponent shall implement the necessary improvements prior~~ | Less than Significant | Implementation of **MM-UTIL-1** would require County DPR to conduct a water study to assess the capacity of existing water facilities, and, in the event insufficient capacity exists to serve the project, requires County DPR to construct the necessary improvements prior to occupancy and operation of the project. Therefore, implementation of **MM-UTIL-1** would ensure construction of sufficient water infrastructure and reduce impacts to a less-than-significant level. |

| Summary of Potentially Significant Impact(s) | Summary of Mitigation Measure(s) | Level of Significance After Mitigation | Rationale for Finding After Mitigation |
|---|---|---|---|
| ~~these facilities could result in physical impacts on the environment.~~ | ~~to operation of the project, as determined by PDMWD. Should it be determined that the project would result in the need for new or expanded water facilities, the project proponent shall analyze the potential environmental effects of the improvements in accordance with CEQA.~~**MM-UTIL-1: Complete Water Study to Assess Water Infrastructure Capacity** | | |
| **Impact-UTIL-2: Insufficient Water Supplies Available to Serve the Project During Operation**~~. Due to the potential substantial increase in water demand as a result of implementation of the project, sufficient water supplies may not be available to serve the project during normal, dry, and multiple dry years.~~ | **MM-UTIL-2**: **Confirm Water Supply Availability for Development of the Project Prior to Issuance of Building Permits**~~.~~ | Less than Significant | Implementation of **MM-UTIL-2** would require would ensure sufficient water supplies are available prior to issuance of a building permit. Therefore, **Impact-UTIL-2** would be reduced to a less-than-significant level by requiring confirmation of water availability. |

Section 4.20
# Wildfire

## 4.20.1 Overview

This section describes the existing wildfire conditions of the project site and vicinity, identifies associated regulatory requirements, evaluates potential impacts, and identifies mitigation measures related to implementation of the project. Potential wildfire impacts resulting from construction and operation of the project were evaluated based on a review of existing resources, data, and applicable laws, regulations, guidelines, and standards. This section focuses on the effects of the project related to wildfire risk. Fire protection services for the project are addressed in Section 4.15, *Public Services*.

## 4.20.2 Existing Conditions

The sections below provide a brief background for wildfire risk in the ~~s~~State and the region, the existing conditions on the project site, and the official fire hazard designations for the project site.

### 4.20.2.1 Regional and Local Wildfire Risk

Wildfire, as defined in Public Resources Code (PRC) Sections 4103 and 4104, is any uncontrolled fire spreading through vegetative fuels that threatens to destroy life, property, or resources. Wildfires can occur in undeveloped areas and spread to urban areas where the landscape and structures are not designed and maintained to be ignition resistant. Several factors, including climate, wind patterns, native vegetation, topography, and development patterns, make the unincorporated ~~county~~area susceptible to wildfires. A vast amount of ~~the county's~~San Diego County's undeveloped lands support natural habitats such as grasslands, sage scrub, chaparral, and some coniferous forest. Extended droughts, characteristic of the region's Mediterranean climate, result in large areas of dry vegetation that provide fuel for wildland fires. In addition, climate change has contributed to soil dryness. Dry vegetation is especially vulnerable to wildfire in areas with high winds. Steep hillsides and varied topography within portions of San Diego County also contribute to the risk of wildland fire.

Fires can be ignited naturally or by human-related causes. In Southern California, over 95% of fires are started by people (County of San Diego 2010). The potential for wildland fires represents a hazard when development is adjacent to open space~~/preserve~~ lands or close to wildland fuels or designated fire severity zones. The Wildland Urban Interface (WUI) is the area where structures and other human developments meet or intermingle with undeveloped wildlands or vegetative fuels. A WUI is defined by the California Department of Forestry and Fire Protection (CAL FIRE) as a buffer around areas of residential density with more than 0.05 dwelling unit per acre. The WUI is divided into a Defense Zone (the area up to 0.25 mile from the developed area) and a Threat Zone (0.25 to 1.5 miles from developed areas) (County of San Diego 2020a). The WUI is composed of communities that border wildlands or are intermixed with wildlands where the minimum density exceeds one structure per 40 acres. WUI communities are created when the following conditions occur: (1) structures are built at densities greater than one unit per 40 acres, (2) the percentage of native

vegetation is less than 50%, (3) the area is more than 75% vegetated, and (4) the area is within 1.5 miles of an area larger than a census block (1,325 acres).

The WUI creates an environment in which fire can move readily between structural and vegetation fuels. Fires that occur in WUI areas may affect natural resources, life, and property. Approximately 60,072 acres of the Alpine Community Plan area are within a WUI, which represents 88% of the community (County of San Diego 2020a).

The community of Alpine is at the foothills of the Peninsular Range, which runs through Southern California and into Baja Mexico along a northwest to southeast trajectory. This topography allows Alpine to experience strong easterly Santa Ana winds. These winds most commonly reach their peak between September and March; however, Santa Ana winds have been experienced in every month of the year. Santa Ana wind conditions occur when cooler and drier air masses form an area of high pressure in the Great Basin region of the Pacific Southwest. This causes a pressure gradient to occur with low-pressure air masses along the Southern California coastline. With this phenomenon, winds are compressed and funneled through narrow drainages formed by the mountain ranges. If the pressure gradient is large, this compression combines with gravity to cause the wind to accelerate downhill to potential hurricane speeds. The nearby Laguna and Viejas Mountains, the Sweetwater River drainage, and other significant topography within the Peninsular Range influence both winds and wildfire events, creating a historical wildfire corridor. This phenomenon also causes high wind speeds and warm, dry air that wicks moisture from the native flora, causing fuel moisture levels to lower to a critical condition. This fire hazard condition is often referred to as "red flag" levels. In addition to the Santa Ana wind threat, the predominant weather pattern for the Alpine area between March and September is onshore diurnal winds, often with a western trajectory and averaging near 20 miles per hour. Under these typical conditions, Alpine can experience high daily temperatures and low relative humidity (Rohde and Associates 2021).

The 2018 West Fire burned approximately 500 acres in the Alpine community, destroying 56 structures. The West Fire affected the project site directly. The fire line for containing this event was on the project site's northern boundary (Rohde and Associates 2021).

The project site is primarily flat grassland, with coastal sage in the northern segment of the project boundary. The adjacent Wright's Field Preserve is contoured and more sloping. Some areas are dominated by grass, but most areas are covered primarily with a mix of sage scrub and chapparal, along with some oak woodlands. The project site and Wright's Field Preserve are on contiguous parcels, forming a common wildfire compartment for the purposes of analyzing wildfire risk. They are subject to impacts from a single wildfire event and pose a wildfire risk to the adjacent WUI in the community of Alpine (Rohde and Associates 2021). The occurrence of Santa Ana winds plus the dry climate and existing natural habitat of the project site put it at high risk for wildfire.

## 4.20.3 Fire Hazard Designations

CAL FIRE has mapped areas of significant fire hazards in ~~the county~~San Diego County through its Fire and Resource Assessment Program. CAL FIRE defines and maps Fire Hazard Severity Zones (FHSZs) to identify the potential fire hazard severity expected in different areas within the ~~s~~State~~.~~ as required by PRC Sections 4201–4205. An FHSZ determination is based on an area's vegetation, topography (slope), weather (including winds), crown fire potential, and ember production and movement potential. FHSZs include the classifications Very High, High, or Moderate in areas where

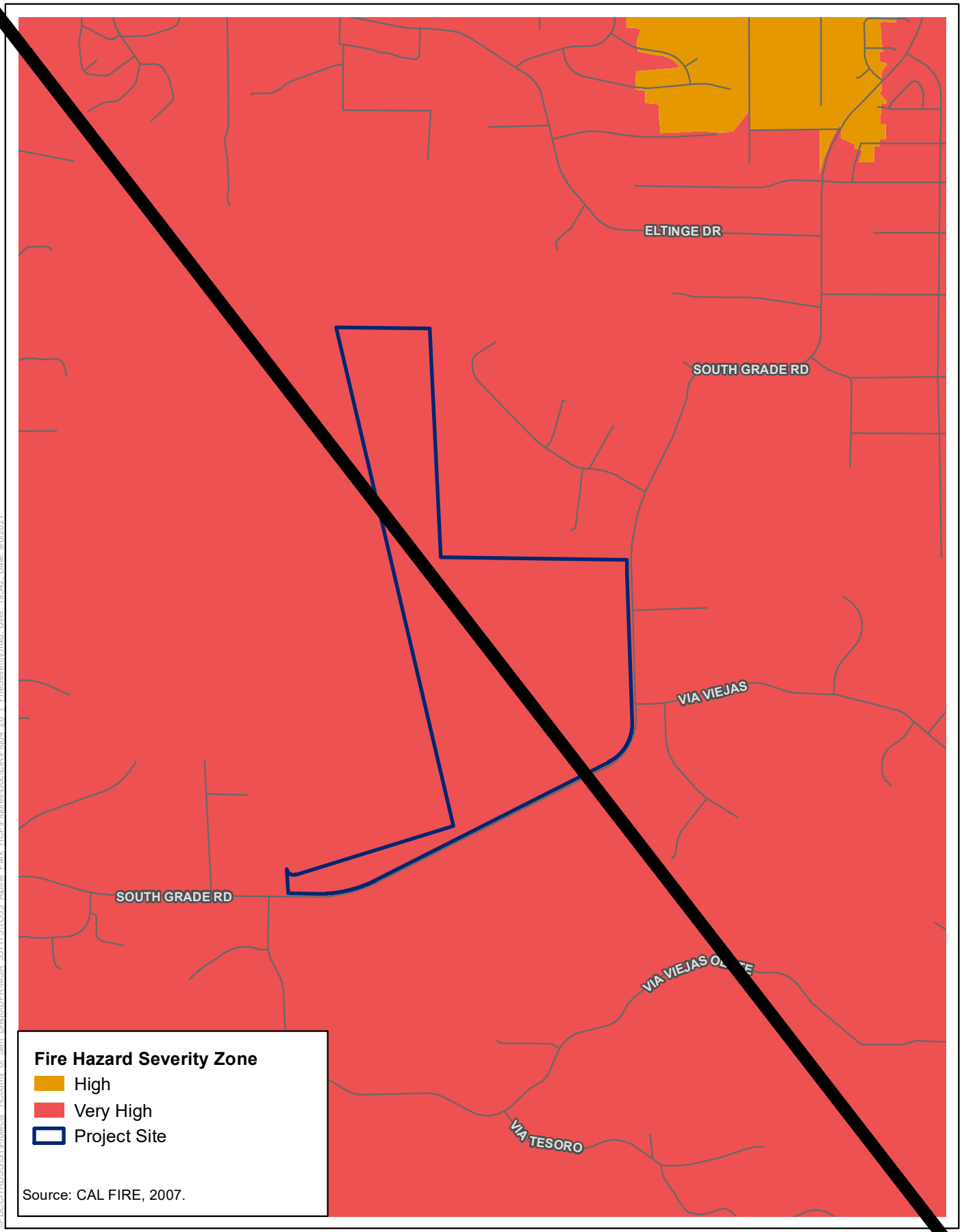
the ~~s~~State is responsible for fire protection (i.e., State Responsibility Areas [SRAs]) (CAL FIRE 2007). The majority of San Diego County is included in an SRA for fire prevention and suppression. However, some areas, such as national forests, are within Federal Responsibility Areas, which are under the responsibility of the U.S. Forest Service for wildfire protection. FHSZs include the classification Very High Fire Hazard Severity Zone (VHFHSZ) in areas where local agencies are responsible for fire protection (i.e., Local Responsibility Areas) (CAL FIRE 2009). In San Diego County, local fire protection is provided by fire protection districts (FPDs) and ~~county service areas~~County Service Areas in unincorporated areas, along with city fire departments and joint powers agreements within city boundaries.

The project site and surrounding area are within an area identified as a VHFHSZ in an SRA (Figure 4.20-1~~).~~).

## 4.20.3.1 Fire and Emergency Response

The County of San Diego (County) Office of Emergency Services (OES) coordinates the overall County response to disasters. OES notifies appropriate agencies when a disaster occurs, coordinates with responding agencies, ensures that resources are available and mobilized, plans for the response to and recovery from disasters, and develops preparedness materials for the public. OES acts as the staff to the Unified Disaster Council (UDC), which was established under a joint powers agreement among all 18 incorporated cities and the County, coordinating plans and programs countywide to ensure the protection of life and property.

Fire protection services for the project site are provided by the Alpine FPD, which covers 27.5 square miles (County of San Diego 2011a). Alpine FPD Station 17 is at 1364 Tavern Road, approximately 2.7 miles from the project site. Station 17 has a Type 1 advanced-life-support/paramedic structure fire engine. It also cross~~-~~staffs a Type 3 wildland fire engine, has a chief officer, and houses a paramedic ambulance 24 hours a day. Alpine FPD also has a joint agreement with neighboring fire agencies in the Central Zone of San Diego County for immediate services; it also maintains dispatch services through the Heartland regional dispatch center. Wildland fire protection for the immediate area of Alpine is provided in SRA wildlands by the CAL FIRE San Diego Unit. CAL FIRE, as the contract provider of services for the San Diego County FPD, also provides structural fire and rescue services to the unincorporated ~~areas of San Diego County.~~area. Some areas in the community of Alpine are covered by both agencies, with fire protection for Local Responsibility Area structural services provided by Alpine FPD and wildland fire protection provided to the SRA by CAL FIRE. Nearby federal lands within the Cleveland National Forest are under the jurisdiction of the U.S. Department of Agriculture, Forest Service (USFS). The USFS, which is responsible for wildland fire protection on the National Forest, maintains a fire station in the community of Alpine. Automatic aid agreements exist between CAL FIRE, USFS, and Alpine FPD, ensuring a response from the closest appropriate resource to a reported emergency, regardless of jurisdictional boundary.




0 500 1,000 Feet
1 in = 1,000 ft

N

**Figure 4.20-**
**Very High Fire Hazard Severity Zone (VHFHSZ)**
**Alpine Park Project**

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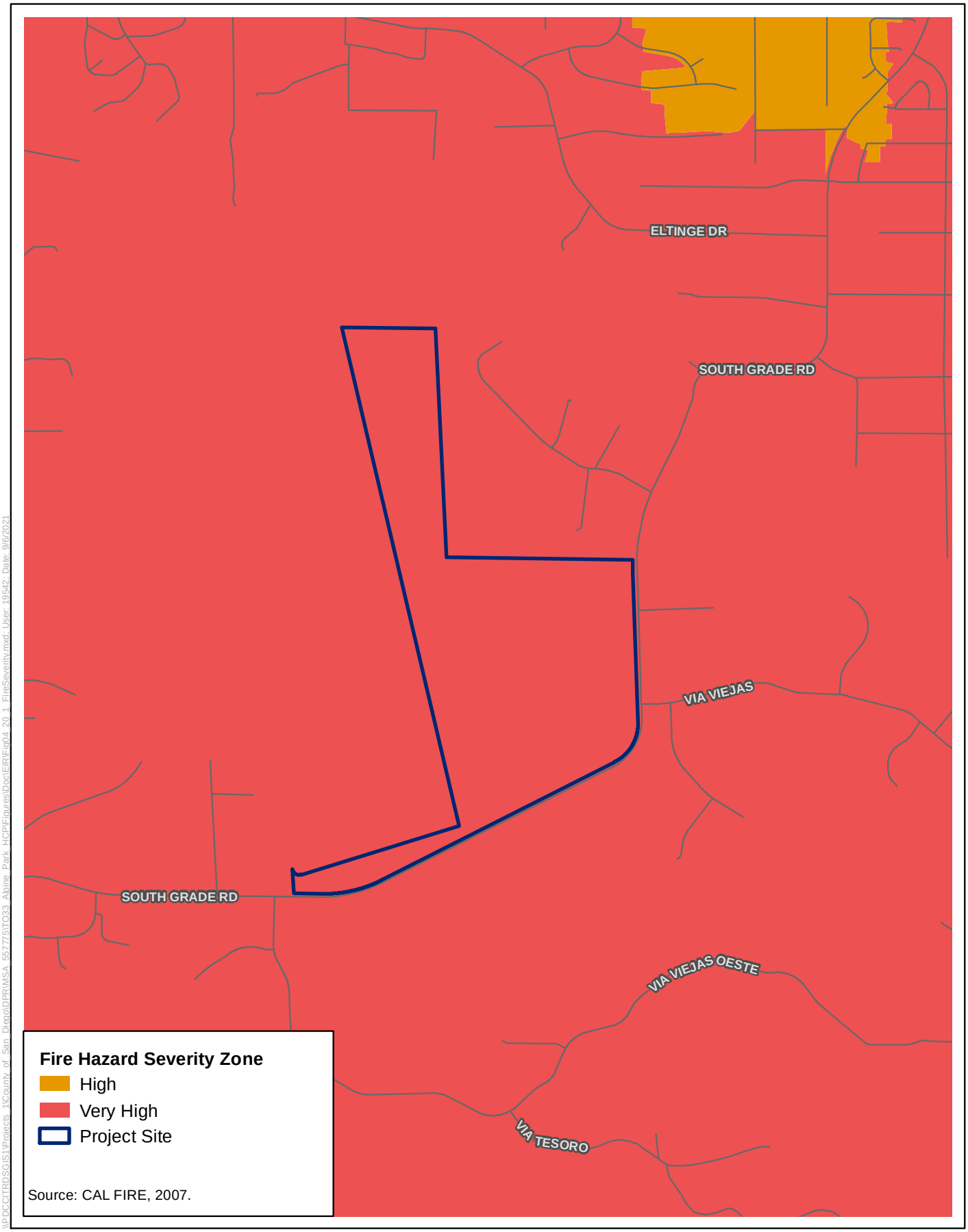


**Figure 4.20-1**
**Very High Fire Hazard Severity Zone (VHFHSZ)**
**Alpine Park Project**

# 4.20.4 Wildfire Hazards

As referenced within Section 4.9*, Hazards and Hazardous Materials*, a Fire and Emergency Operation Assessment (FEOA) was prepared to identify specific wildfire risks at the project site (Rohde and Associates 2021); the following information in this section is from the FEOA (Appendix J). The FEOA noted that, historically, the project site has been subject to wildfires. In 2018, the West Fire affected the proposed Alpine Park site directly. The fire line for containing the West Fire was on the proposed park's northern boundary. In 1970, the Laguna Fire also burned much of the proposed park area. The FEOA identified site-specific wildfire and ignition risks associated with the project site and recommended fire prevention measures, as stated below:

- *Proximity to South Grade Road, a known location with increased human-related fire ignition factors*. The location of South Grade Road, on the southeast boundary of the land for Alpine Park, poses elevated ignition risks because of passing vehicles—specifically, vehicle exhaust, hot materials discarded from vehicles, vehicle accidents, off-road parking, dragging tow chains, or related hazards. However, the County will continue to maintain an existing 30-foot buffer where vegetation has been cleared adjacent to the roadside along the County property, which has been historically cleared and is required by the Alpine Fire Protection District, and is not part of this project. As part of the ~~proposed~~ project, the County would create an additional 20-foot buffer adjacent to the existing 30-~~-~~foot buffer along the park footprint, for a total of 50 feet. As part of the ~~proposed~~ project, the County would also create an additional 20-foot buffer adjacent to the existing 30-foot buffer approximately 100 feet south of the northeast corner of the County's parcel.
- *Adjacency of the site to significant human activity, including homes and ranches*. The proximity of homes and ranches to County Department of Parks and Recreation (DPR) and Back Country Land Trust (BCLT) lands poses risks from human-related fire ignition factors, extending from these properties to the site. For this risk, the County will continue to maintain a historically cleared and existing 100-foot buffer where vegetation has been cleared where there are adjoining properties along the northern boundary of the County-owned parcel, which is required by the Alpine Fire Protection District and is not part of this project. As part of the project, the County would create a 100-foot buffer that would extend from the volunteer pad.
- *Robust public usage of the site for both dispersed and organized recreation*. Human use could increase on the site with development of the park, thereby increasing the associated human-related fire ignition factors. The historical unregulated public use of these lands would now be regulated and managed by ~~the~~ County DPR. This includes the introduction of new and enhanced fire prevention measures. Development of the sports fields, associated parking, public facilities, and support buildings would include landscaping to isolate these facilities from the surrounding wildland, a requirement of the fire and building codes. This would reduce wildfire exposure and ignition risks. ~~The~~ County DPR would coordinate with the utility service provider to consider undergrounding the adjacent electric utility services. Additional fuel reduction measures would also be implemented to further isolate these uses for public safety and ignition resistance.
- *Location of the park site with respect to historical major wildfire corridors*. Historical wildfire corridors that experience both Santa Ana winds and onshore wind-driven conditions are within proximity of the project site. Past wildfires have traversed this corridor. However, fuel modification and the placement of developed park features would aid in containing wildfire

movement within this corridor. A fire line was established in the past within the Wright's Field site for containment purposes. and will continue to be maintained by BCLT.

- *Heavy fuel concentrations on some County/BCLT lands*. Heavier fuels could present extreme burning characteristics during critical fire weather, including high thermal outputs, rapid rates of spread, and spotting. Because heavy fuel is concentrated primarily on BCLT lands, the County would coordinate with BCLT to alleviate wildfire risks and prevent fire from either entering the preserveopen space from adjacent property or moving through preserveopen space lands and affecting private properties.
- *Current off-road parking and occasional vehicle trespass*. Trespassing does occasionally occur, although vehicle access is currently blocked by light fencing. Park development is expected to strengthen the vehicle control barriers and provide improved fire-safe parking.
- *Potential increase in demand for local public safety resources due to the developed park use*. New demands on public safety resources resulting from the development of new park facilities is not expected to place unmitigable demands on local fire or law enforcement services. For this risk, a full review of the existing response capability and potential development impacts was conducted, as discussed in the FEOA. In addition, the project would employ an include a live-on-site volunteer, maintenance staff that would provide new security for, and a park facilities upon build-outranger to help with maintenance and management of the property.

### 4.20.4.1 Fuel Reductions and Modifications

As discussed in Section 4.20.4, *Wildfire Hazards*, and shown in Figure 4.20-2, existing and proposed long-term fuel reductions and fuel modifications will be implemented throughout the County property. Fuel reductions and modifications, which would include vegetation clearance, would be implemented to reduce wildfire intensity, thereby offering reasonable protection for adjacent structural assets, limiting landowner liability associated with wildfire damage to adjoining properties, providing protection for DPR/BCLT site development, and ensuring safe public refuge at key sites. Existing and proposed fuel reductions would occur along the northern perimeter of the Alpine Park facility and adjoining properties, as well as along the roadside, to reduce hazards associated with increases in human-related fire ignition factors. The roadside fuel clearance also reduces any extension of wildfire from the historical wildfire corridor on the east face of the site.

## 4.20.5 Applicable Laws and Regulations

### 4.20.5.1 Federal

#### International Fire Code

The International Fire Code (IFC), created by the International Code Council, is the primary means for authorizing and enforcing procedures and mechanisms to ensure the safe handling and storage of substances that may pose a threat to public health and safety. The IFC regulates the use, handling, and storage requirements for hazardous materials at fixed facilities. The IFC and the International Building Code use a hazard classification system to determine what protective measures are required to protect fire and life safety. These measures may include construction standards, separations from property lines, and specialized equipment. To ensure that these safety measures

are met, the IFC employs a permit system based on hazard classification. The IFC is updated every 3 years.

## International WUI Code

The International WUI Code is published by the International Code Council and is a model code addressing wildfire issues.

## Federal Wildland Fire Management Policy

The 1995 Federal Wildland Fire Management Report produced the first comprehensive federal fire policy for the Departments of the Interior and Agriculture. That review was stimulated by the 1994 fire season with its 34 fatalities and growing recognition of fire problems caused by fuel accumulation. The resulting 1995 policy recognized, for the first time, the essential role of fire in maintaining natural systems. In the aftermath of the escape of the Cerro Grande prescribed fire in May of 2000, the Secretaries of the Interior and Agriculture requested a review of the 1995 policy and updated it in the 2001 review and update of the 1995 Federal Wildland Fire Management Policy. *Guidance for Implementation of Federal Wildland Fire Management Policy* (U.S. Forest Service et al. 2009) provides the following guidelines that should be used to ensure consistent implementation of federal wildland fire policy:

- Firefighter and public safety is the first priority in every fire management activity;
- The role of wildland fire as an essential ecological process and natural change agent will be incorporated into the planning process;
- Fire management plans, programs, and activities support land and resource management plans and their implementation;
- Sound risk management is a foundation for all fire management activities;
- Fire management programs and activities are economically viable, based on the values to be protected, costs, and land and resource management objectives;
- Fire management plans and activities are based on the best available science;
- Fire management plans and activities incorporate public health and environmental quality considerations;
- Federal, state, tribal, local, interagency, and international coordination and cooperation are essential; and
- Standardization of policies and procedures among federal agencies is an ongoing objective.

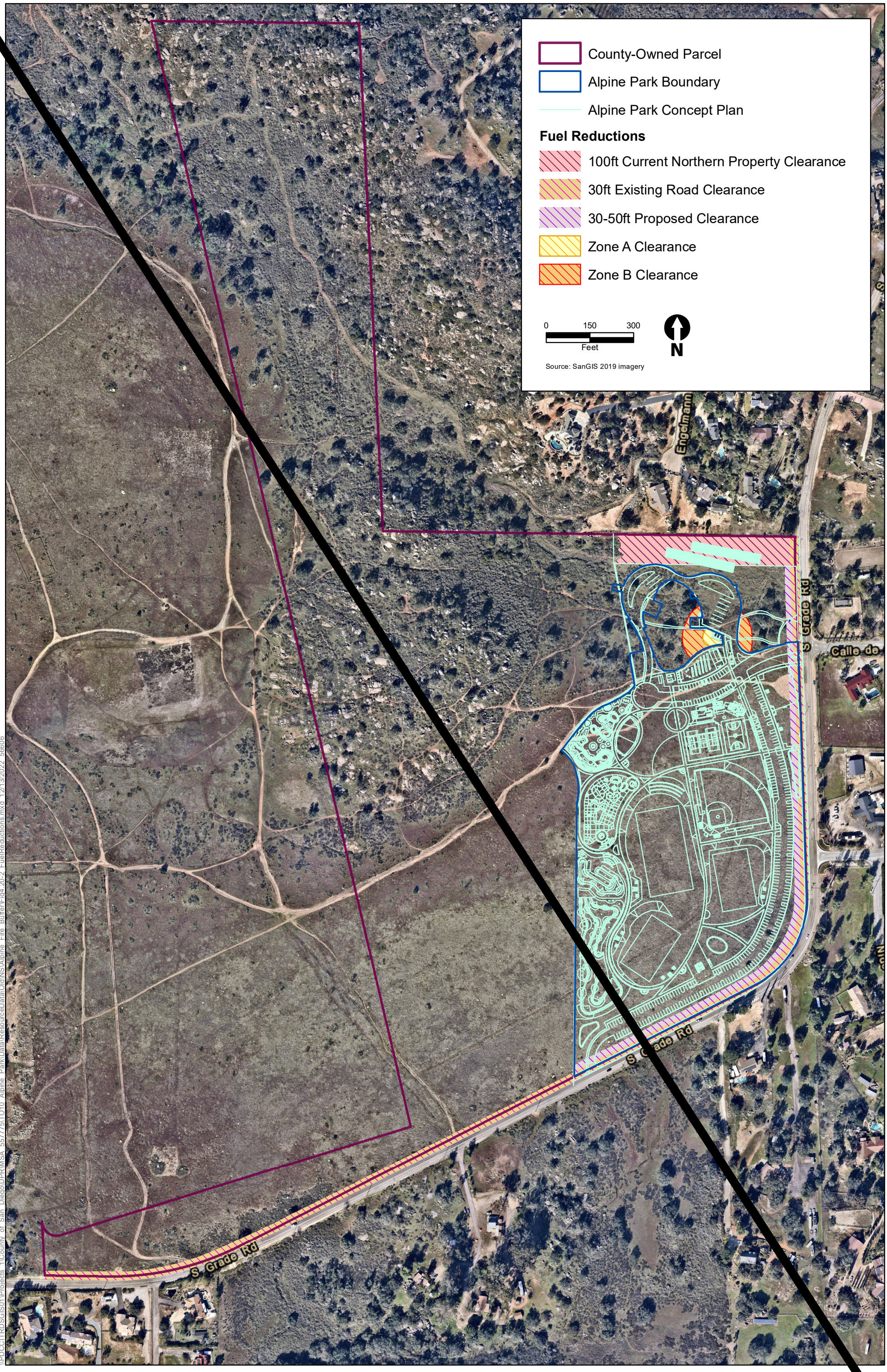


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**Figure 4.20-2**
**Fuel Reductions**
**Alpine County Park Project Environmental Impact Report**

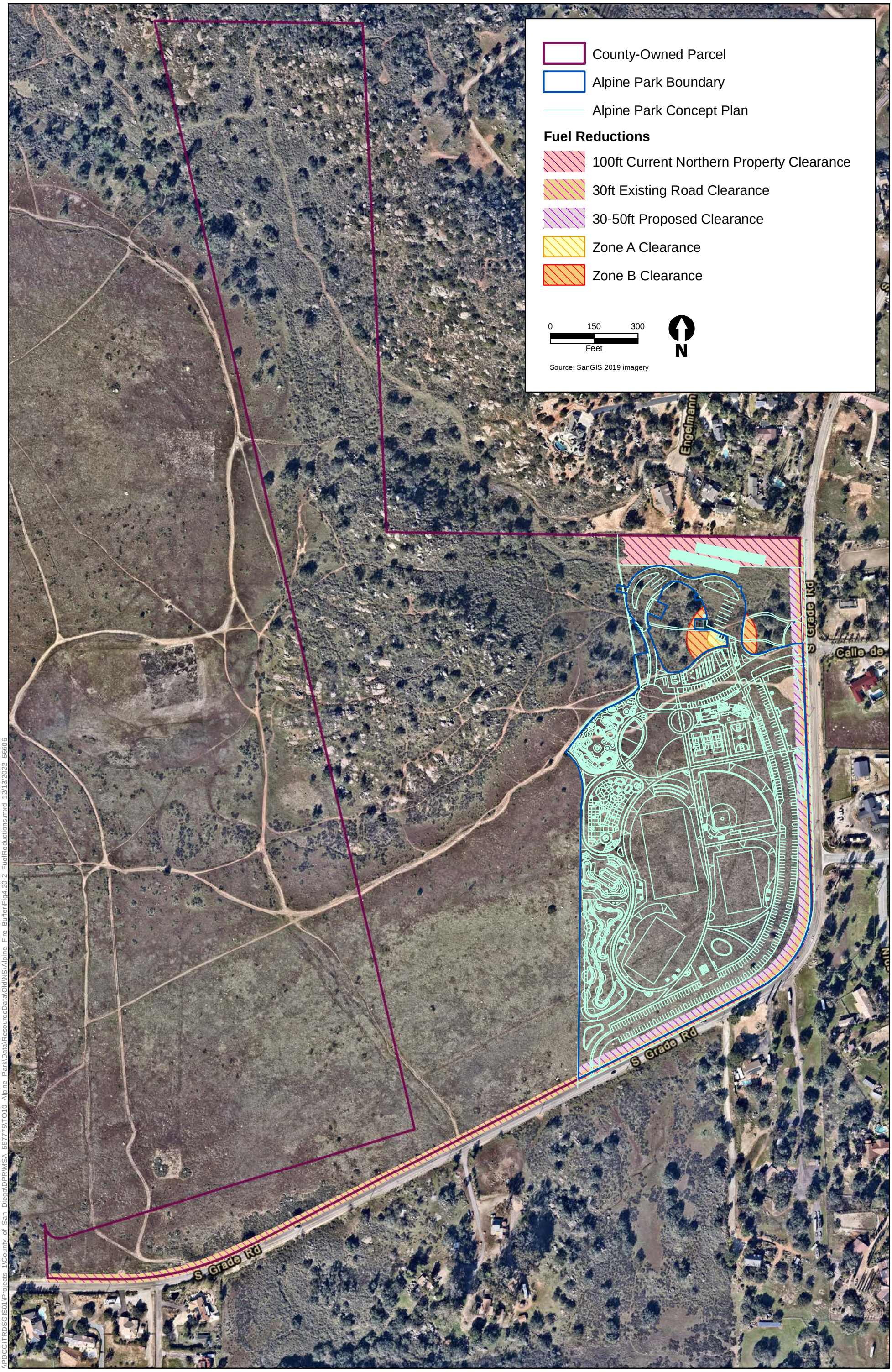


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**Figure 4.20-2**
**Fuel Reductions**
**Alpine County Park Project Environmental Impact Report**

## 4.20.5.2 State

### California Emergency Services Act

The California Emergency Services Act was adopted to establish the ~~s~~State's roles and responsibilities during human-caused or natural emergencies that result in disaster conditions and/or extreme peril to life, property, or resources of the ~~s~~State. This act is intended to protect health and safety by preserving the lives and property of the people of the ~~s~~State.

### California Natural Disaster Assistance Act

The California Natural Disaster Assistance Act provides financial aid to local agencies assisting in the permanent restoration of public real property, other than facilities used solely for recreational purposes, when such real property has been damaged or destroyed by a natural disaster. The act is activated after a local declaration of emergency and the California Emergency Management Agency gives concurrence with the local declaration, or after the governor issues a proclamation of a ~~s~~State emergency. Once the act is activated, the local government is eligible for certain types of assistance, depending on the specific declaration or proclamation issued.

### California Department of Forestry and Fire Protection

CAL FIRE protects the people of California from fires, responds to emergencies, and protects and enhances forest, range, and watershed values providing social, economic, and environmental benefits to rural and urban citizens. CAL FIRE's firefighters, fire engines, and aircraft respond to an average of more than 5,400 wildland fires each year (CAL FIRE 2016). The Office of the State Fire Marshal supports CAL FIRE's mission by focusing on fire prevention. It provides support through a wide variety of fire safety responsibilities including by regulating buildings in which people live, congregate, or are confined; controlling substances and products that may, in and of themselves or by their misuse, cause injuries, death, and destruction by fire; providing statewide direction for fire prevention in wildland areas; regulating hazardous liquid pipelines; reviewing regulations and building standards; and providing training and education in fire protection methods and responsibilities.

### 2018 Strategic Fire Plan for California

The 2018 Strategic Fire Plan for California (2018 Plan) is a cooperative effort between the State Board of Forestry and Fire Protection and CAL FIRE (State Board of Forestry and Fire Protection and CAL FIRE 2018).

In 2018, the Board of Forestry and Fire Protection adopted a new strategic fire plan to address fire concerns in California. The board has adopted fire plans since the 1930s and periodically updates them to reflect current and anticipated needs. Over time, as the environmental, social, and economic landscape of California's wildlands changed, the board has evolved the Strategic Fire Plan to respond to these changes and to provide CAL FIRE with appropriate guidance "for adequate statewide fire protection of state responsibility areas" (PRC Section 4130). The 2018 Plan calls for a natural environment that is more fire resilient, buildings and infrastructure that are more fire resistant, and a society that is more aware of and responsive to the benefits and threats of wildland fire, all achieved through local, ~~s~~State, federal, tribal, and private partnerships.

The goals that are critical to achieving the 2018 Plan's vision revolve around fire prevention, natural resource management, and fire suppression efforts, as broadly construed. Major components are:

- Improve the availability and use of consistent, shared information on hazard and risk assessment;
- Promote the role of local planning processes, including general plans, new development, and existing developments, and recognize individual landowner/homeowner responsibilities;
- Foster a shared vision among communities and the multiple fire protection jurisdictions, including county-based plans and community-based plans such as Community Wildfire Protection Plans;
- Increase awareness and actions to improve the fire resistance of at-risk man-made assets and the fire resilience of wildland environments through natural resource management;
- Integrate implementation of fire and vegetative fuels management practices consistent with the priorities of landowners or managers;
- Determine and seek the needed level of resources for fire prevention, natural resource management, fire suppression, and related services; and
- Implement needed assessments and actions for post-fire protection and recovery.

## California Public Resources Code

### Fire Hazard Severity Zones – Public Resources Code Sections 4201–4204

In 1965, PRC Sections 4201–4204 directed CAL FIRE to map areas with significant fire hazards, based on fuels, terrain, weather, and other relevant factors. These FHSZs define the application of various mitigation strategies to reduce risks associated with wildland fires.

### Very High Fire Hazard Severity Zones – Government Code Sections 51175–51189

In 1992, Government Code Sections 51175–51189 established the classification for very high fire hazard severity based on fuel loading, terrain, weather, and other relevant factors identified by CAL FIRE as major causes of wildfire spread and the severity of fire hazard expected in those areas. The code established requirements for those that maintain an occupied dwelling within a designated VHFHSZ. The VHFHSZs define the application of mitigation measures to reduce risk associated with uncontrolled wildfires and require that the measures be taken. Local agencies designate the VHFHSZs within their jurisdictions as required by CAL FIRE.

## Senate Bill 1241

In 2012, Senate Bill 1241 added Section 66474.02 to Title 7, Division 2, of the California Government Code, commonly known as the Subdivision Map Act. The statute prohibits subdivision of parcels designated very high fire hazard, or that are in an SRA, unless certain findings are made prior to approval of the tentative map. The statute requires that a city or county planning commission make three new findings regarding fire hazard safety before approving a subdivision proposal. The three findings are, in brief: (1) the design and location of the subdivision and its lots are consistent with defensible space regulations found in PRC Sections 4290–4291; (2) structural fire protection services will be available for the subdivision through a publicly funded entity; and (3) ingress and

egress road standards for fire equipment are met per any applicable local ordinance and PRC Section 4290.

## Fire Safe Development Regulations

In 1991, the Fire Safe Development Regulations were developed to implement PRC Section 4290 and stipulate minimum requirements for building construction in SRAs. These regulations address ingress and egress (e.g., road widths, turnouts), building and street sign visibility, emergency water standards, and fuel modification. In June 2012, CAL FIRE and the Board of Forestry and Fire Protection formed a workgroup to revise the Fire Safe Development Regulations. Changes to the regulations were effective January 1, 2016. This workgroup was re-engaged in 2017 to align the update timeline for the Fire Safe Development Regulations with the triennial California Fire Code (CFC) cycle. The workgroup has been reviewing the existing regulations based on feedback received from the 2016 updates to reduce inconsistencies and improve clarity. These changes are anticipated to be effective with the 2020 CFC on January 1, 2020.

## California Building Code and Fire Code

The California Code of Regulations, Title 24, is a compilation of building standards, including fire safety standards for residential and commercial buildings. The California Building Code (CBC) standards serve as the basis for the design and construction of buildings in California. The CFC is a component of the CBC. Typical fire safety requirements of the CFC include the installation of sprinklers in all high-rise buildings; the establishment of fire-resistance standards for fire doors, building materials, and particular types of construction; and the clearance of debris and vegetation within a prescribed distance from occupied structures in wildfire hazard areas. The CFC applies to all occupancies in California, except where more stringent standards have been adopted by local agencies.

The CFC includes requirements for building construction and vegetation management within areas designated as WUI areas. In such areas, all new buildings must comply with the CBC, which defines construction requirements to reduce wildfire exposure. In addition, buildings within the WUI must comply with California laws and regulations that require maintenance of a "defensible space" of 100 feet from structures (PRC § 4291; CCR § 1299.03). In particular, CBC Chapter 7A applies to building materials, systems, and/or assemblies used in the exterior construction of new buildings within a WUI. Chapter 7A establishes minimum standards for the protection of life and property by increasing the ability of a building in an FHSZ and an SRA or WUI to resist the intrusion of flames or burning embers projected by a vegetation fire. Therefore, the CFC contributes to a systematic reduction in conflagration losses. New buildings in an FHSZ or any WUI, as designated by an enforcing agency, constructed after the application date ~~shall comply with the provisions of Chapter 7A.~~ , shall comply with the provisions of Chapter 7A. County DPR will be responsible for the review of structural development within the park for fire code compliance.

## State Fire Regulations

State fire regulations are set forth in Sections 13000 et seq. of the California Health and Safety Code, which include regulations concerning building standards (as also set forth in the CBC), fire protection and notification systems, fire protection devices such as extinguishers and smoke alarms, high-rise building and childcare facility standards, and fire suppression training. The State Fire

Marshal enforces these regulations and building standards in all ~~s~~State-owned buildings, ~~s~~State-occupied buildings, and ~~s~~State institutions throughout California.

# 4.20.5.3 Regional

## County of San Diego Multi-Jurisdictional Hazard Mitigation Plan

The federal Disaster Mitigation Act of 2000 requires all local governments to create a disaster plan in order to qualify for hazard mitigation funding. The Multi-Jurisdictional Hazard Mitigation Plan (County of San Diego 2017) is a countywide plan that identifies risks and ways to minimize damage by natural and human-made disasters. The plan is a comprehensive resource document that serves many purposes, such as enhancing public awareness, creating a decision tool for management, promoting compliance with ~~s~~State and federal program requirements, enhancing local policies for hazard mitigation capability, and providing inter-jurisdictional coordination.

The Multi-Jurisdictional Hazard Mitigation Plan addresses wildfire risks within the San Diego region by assessing the exposure in the different jurisdictions. The assessment considers the exposure of the population, residential buildings, and commercial buildings as well as the exposure of critical facilities and infrastructure, such as airports, bridges, and electric power facilities. The plan then outlines goals, objectives, and actions for each jurisdiction within the San Diego region. Goals related to wildfire typically include reducing the possibility of damage and loss. Objectives and actions related to wildfire typically include measures such as updating evacuation plans, maintaining vegetation management policies, and maintaining an adequate emergency response capability.

## San Diego County Emergency Operations Plan

OES implements the Operational Area Emergency Operations Plan in collaboration with the Unified San Diego County Emergency Services Organization (Unified San Diego County Emergency Services Organization and County of San Diego 2018). The plan is used by the County and all of the cities within ~~the county~~San Diego County to respond to major emergencies and disasters. It describes the roles and responsibilities of all County departments, including many city departments, and the relationship among the County, its departments, and the jurisdictions within ~~the county.~~San Diego County. The plan contains 16 annexes, detailing specific emergency operations for different emergency situations.

## San Diego County WUI Fire Emergency Response Plan

The San Diego County Fire Chiefs Association and the San Diego County Police Chiefs' and Sheriff's Association approve the San Diego County WUI Fire Emergency Response Plan, which is the County's standard emergency response and evacuation management plan format for wildfire. The San Diego County WUI Fire Emergency Response Plan was updated for the Alpine southeast area in the Rohde and Associates FEOA (2021). This document is attached to the FEOA report as Appendix J. The plan provides critical information regarding risk assessment, hazards, emergency resource necessities, and tactical evacuation. The tactical plan offers an evacuation plan and recommended strategies or tactics for combating wildfire. County DPR shall implement the project in compliance with the plan, as outlined in this chapter. Staff will become familiar with the plan and be prepared to integrate with public safety responders in response to emergencies at the site. Furthermore, staff members should consider the evacuation and "trigger point" criteria in the plan and determine if additional time will be required to mobilize internal staff members and implement the plan. Park

personnel are urged to develop additional emergency response plans consistent with this document and the means and methods necessary for emergency communications with the public.

## County of San Diego ~~Municipal~~ Code of Regulatory Ordinances

The County of San Diego ~~Municipal~~ Code of Regulatory Ordinances Title 9, Division 6, Fire Protection (County Fire Code), adopts the CFC with modifications or amendments specific to the local climatic, geological, or topographical conditions of ~~the county.~~San Diego County. The County Fire Code provides definitions, requirements, and procedures for permits; and regulations for building, repair, maintenance, demolition, and equipment use and fire protection systems. The County Fire Code authorizes the County Fire Warden to be the party responsible for enforcement of the County Fire Code in the unincorporated areas ~~of the county~~ that are outside an FPD. In an FPD, the district fire chief or his/her duly authorized representative is responsible for enforcement.

## County of San Diego Code of Regulatory Ordinances Sections 68.401–68.406, Defensible Space for Fire Protection Ordinance

This ordinance addresses issues associated with an accumulation of weeds, rubbish, and other materials on private property that creates a fire hazard and could be injurious to the health, safety, and general welfare of the public. Under the ordinance, the presence of such weeds, rubbish, and other materials is a public nuisance that requires abatement in accordance with the provisions of Sections 68.401–68.406. The ordinance is enforced in all ~~county service areas~~County Service Areas as well as unincorporated areas ~~of the county~~ that are outside a fire protection district. All fire protection districts have a combustible vegetation abatement program, and many have adopted the County's ordinance.

## County of San Diego Code of Regulatory Ordinances Sections 96.1.005 and 96.1.202, Removal of Fire Hazards

The San Diego County ~~Fire Protection District~~FPD, in partnership with CAL FIRE, the Bureau of Land Management, and USFS, is responsible for enforcing defensible space inspections. Inspectors from CAL FIRE are responsible for the initial inspection of properties, ensuring that an adequate defensible space has been created around structures. If violations of program requirements are noted, inspectors provide a list of required corrective measures and a reasonable timeframe for completing the task. If violations still exist upon reinspection, the local fire inspector will forward a complaint to the County for further enforcement action.

## County of San Diego Consolidated Fire Code

The County ~~of San Diego~~, in collaboration with the local fire protection districts, created the first Consolidated Fire Code in 2001; it contains County and fire protection district amendments to the CFC. The purpose of consolidation with respect to the adoptive ordinances of the County and local fire districts is to promote consistency in the interpretation and enforcement of the CFC and protect public health and safety. This involves permit requirements for the installation, alteration, or repair of fire-protection systems and penalties for violations of the code. The Consolidated Fire Code provides minimum requirements for access, water supply and distribution, construction, fire-protection systems, and vegetation management. In addition, it regulates hazardous material and provides associated measures to ensure that public health and safety are protected from incidents related to hazardous substance releases.

## 4.20.5.4 ~~County Department of Planning and Land Use~~Local

### Alpine Fire Protection District Ordinance

The Alpine FPD was formed in 1957 to provide fire protection for the community of Alpine. Its Board of Directors created the Alpine FPD Ordinance (No. 2020-01), which adopted the CFC, including Appendices B, C, H, I, and K; the International Fire Code; and National Fire Protection Association Standards 13, 13-R, and 13-D, as referenced in Chapter 80 of the CFC, together with Alpine FPD amendments. The CFC is adopted for the protection of public health and safety. The Alpine FPD Ordinance (most recently adopted edition) includes additions, insertions, deletions, and changes to sections and chapters of the CFC.

### Alpine Community Wildfire Protection Plan

The original Alpine Community Wildfire Protection Plan was developed by the Alpine Public Safety Committee, a subcommittee of Supervisor Dianne Jacob's Alpine Revitalization Committee, with guidance and support from the U.S. Forest Service, CAL FIRE, California Department of Transportation, County OES, County Planning & Development Services, County Sheriff's Department, Alpine FPD, Viejas Fire Department, and Alpine Fire Safe Council. The intent of the plan is to optimize the use of scarce resources (i.e., money, people, equipment) to achieve the greatest overall benefit to the community (Alpine Public Safety Committee 2021). The primary goal is to prioritize projects, as follows:

- Defensible space around structures,
- Defensible space along evacuation routes, and
- Hazardous fuels reductions.

A key element of the planning strategy is to link together existing and future fuel-reduction projects so they can provide contiguous corridors of protection along a perimeter surrounding the Alpine area. The areas being linked together involve defensible space projects for community homes and evacuation routes, natural and/or human-made fuel breaks created through agency efforts, and burned areas. Priority is then given to those areas that can achieve the greatest degree of protection with the limited resources available.

### Alpine Community Plan

The *Alpine Community Plan* (County of San Diego 2020b) outlines guidelines and policies for development within the community plan area. The policies and recommendations that apply to wildfire risk are as follows:

**Safety Policy 3.** Encourage development with fire-preventive development practices and fire resistant plant types.

**Safety Policy 4.** Consider fire hazards in Alpine a serious and significant environmental impact during review of Environmental Impact Reports.

**Conservation Policy 13.** Encourage the continuation of support for the brush management program in conjunction with other public agencies to reduce wildfire hazards.

## County Planning & Development Services Fire Prevention in Project Design Standards

Following the October 2003 wildfires, the County Department of Planning and Land Use (now Planning & Development Services) incorporated several fire prevention strategies into the discretionary project review process for ~~California Environmental Quality Act (~~CEQA~~)~~ projects. One of the more significant changes is the requirement that calls for most discretionary permits (e.g., subdivision and use permits) in WUI areas to include a fire protection plan for review and approval. A fire protection plan is a technical report that considers the topography, geology, combustible vegetation (i.e., fuel types), climatic conditions, and fire history at the project location. The plan addresses the following items (among others) in terms of compliance with applicable codes and regulations: water supply, primary and secondary access, travel time to the nearest fire station, structure setback from property lines, ignition-resistant building features, fire-protection systems and equipment, impacts on existing emergency services, defensible space, and vegetation management.

## County of San Diego General Plan

The *County of San Diego General Plan* (County of San Diego 2011b) Safety Element contains policies that are applicable to wildfire, as follows:

**Policy S-3.1. Defensible Development.** Require development to be located, designed, and constructed to provide adequate defensibility and minimize the risk of structural loss and life safety resulting from wildland fires.

**Policy S-3.2. Development in Hillsides and Canyons.** Require development located near ridgelines, top of slopes, saddles, or other areas where the terrain or topography affect its susceptibility to wildfires to be located and designed to account for topography and reduce the increased risk from fires.

**Policy S-3.3. Minimize Flammable Vegetation.** Site and design development to minimize the likelihood of a wildfire spreading to structures by minimizing pockets or peninsulas or islands of flammable vegetation within a development.

**Policy S-3.4. Service Availability.** Plan for development where fire and emergency services are available or planned.

**Policy S-3.5. Access Roads.** Require development to provide additional access roads when necessary to provide for safe access of emergency equipment and civilian evacuation concurrently.

**Policy S-3.6. Fire Protection Measures.** Ensure that development located within fire threat areas implement measures that reduce the risk of structural and human loss due to wildfire.

**Policy S-3.7. Fire-Resistant Construction.** Require all new, remodeled, or rebuilt structures to meet current ignition-resistance construction codes and establish and enforce reasonable and prudent standards that support retrofitting existing structures in high fire-threat areas.

**Policy S-6.3. Funding Fire Protection Services.** Require development to contribute its fair share towards funding the provision of appropriate fire and emergency medical services as determined necessary to adequately serve the project.

**Policy S-6.4. Fire Protection Services for Development.** Require that new development demonstrate that fire services can be provided that meets the minimum travel times identified in Table S-1 (Travel Time Standards from Closest Fire Station).

# ~~4.20.5.4~~4.20.1.1 ~~Local~~

## ~~Alpine Fire Protection District Ordinance~~

~~The Alpine FPD was formed in 1957 to provide fire protection for the community of Alpine. Its Board of Directors created the Alpine FPD Ordinance (No. 2020-01), which adopted the CFC, including Appendices B, C, H, I, and K; the International Fire Code; and National Fire Protection Association Standards 13, 13-R, and 13-D, as referenced in Chapter 80 of the CFC, together with Alpine FPD amendments. The CFC is adopted for the protection of public health and safety. The Alpine FPD Ordinance (most recently adopted edition) includes additions, insertions, deletions, and changes to sections and chapters of the CFC.~~

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~~The original Alpine Community Wildfire Protection Plan was developed by the Alpine Public Safety Committee, a subcommittee of Supervisor Dianne Jacob's Alpine Revitalization Committee, with guidance and support from the U.S. Forest Service, CAL FIRE, California Department of Transportation, County OES, County Department of Planning and Land Use (now Planning & Development Services), County Sheriff's Department, Alpine FPD, Viejas Fire Department, and Greater Alpine Fire Safe Council. The intent of the plan is to optimize the use of scarce resources (i.e., money, people, equipment) to achieve the greatest overall benefit to the community (Alpine Public Safety Committee 2021). The primary goal is to prioritize projects, as follows:~~

- ~~Defensible space around structures,~~
- ~~Defensible space along evacuation routes, and~~
- ~~Hazardous fuels reductions.~~

~~A key element of the planning strategy is to link together existing and future fuel-reduction projects so they can provide contiguous corridors of protection along a perimeter surrounding the Alpine area. The areas being linked together involve defensible space projects for community homes and evacuation routes, natural and/or human-made fuel breaks created through agency efforts, and burned areas. Priority is then given to those areas that can achieve the greatest degree of protection with the limited resources available.~~

## ~~Alpine Community Plan~~

~~The *Alpine Community Plan* (County of San Diego 2020b) outlines guidelines and policies for development within the community plan area. The policies and recommendations that apply to wildfire risk are as follows:~~

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>
> ~~**Safety Policy 4.** Consider fire hazards in Alpine a serious and significant environmental impact during review of Environmental Impact Reports.~~
>
> ~~**Conservation Policy 13.** Encourage the continuation of support for the brush management program in conjunction with other public agencies to reduce wildfire hazards.~~

# 4.20.6 Project Impact Analysis

## 4.20.6.1 Methodology

Analysis of potential impacts related to wildfire was based on the ability of fire personnel to adequately serve the existing and future population of the project site, as well as federal, ~~s~~State, and local regulations regarding wildfire.

## 4.20.6.2 Thresholds of Significance

### Appendix G of the CEQA Guidelines

The following significance criteria are based on Appendix G of the CEQA Guidelines and provide the basis for determining the significance of impacts associated with wildfire risk and wildfire-related hazards. Impacts are considered significant if the project would be in or near SRAs or lands classified as VHFHSZs, and would result in any of the following:

1. Substantially impair an adopted emergency response plan or emergency evacuation plan.
2. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.
3. Require the installation or maintenance of associated infrastructure, such as roads, fuel breaks, emergency water sources, power lines, or other utilities, that may exacerbate fire risks or result in temporary or ongoing impacts on the environment.
4. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

### County of San Diego Guidelines for Determining Significance

The following *County of San Diego Guidelines for Determining Significance, Wildland Fire and Fire Protection* (County of San Diego 2010), guide the evaluation of adverse environmental effects that a proposed project may have from wildland fire. The document includes wildfire-related Appendix G threshold questions addressed in other sections of this Final EIR, including Threshold 2 in Section 4.9, *Hazards and Hazardous Materials*; Threshold 1 in Section 4.15, *Public Services;* Threshold 4 in Section 4.17, *Transportation and Circulation*; and Threshold 2 in Section 4.19, *Utilities and Service Systems*. Please refer to the listed sections to see the applicable analysis related to the thresholds.

# 4.20.6.3 Project Impacts and Mitigation Measures

***Threshold 1: Implementation of the project would not substantially impair an adopted emergency response plan or emergency evacuation plan.***

## County Park ~~and~~, Trails, and Open Space~~/Preserve~~

### Impact Discussion

The Operational Area Emergency Operations Plan is used by ~~unincorporated county areas~~the County and all cities in ~~the county~~San Diego County to respond to major emergencies and disasters. The plan establishes roles and responsibilities for County departments and the jurisdictions and outlines emergency operations for the response to different emergency situations. The plan indicates that specific evacuation routes would be determined according to the location and extent of the incident and include as many predesignated transportation routes as possible. According to Annex Q, Evacuation, primary evacuation routes identified in the plan consist of major interstates, highways, and prime arterials in San Diego County (Unified San Diego County Emergency Services Organization and County of San Diego 2018). Conflict could occur with an adopted emergency response plan or emergency evacuation plan if the project were to prevent safe evacuation during an emergency or otherwise prevent safe and timely management of an emergency situation.

#### Construction

~~Construction~~The following analysis was developed assuming construction would occur in one phase over 16 months and ~~is~~was anticipated to begin in fall 2022. Construction equipment would include tractors, excavators, backhoes, a water truck, drill rig, bobcat, forklift, rollers, a rubber tire loader, wheel tractor scrapers, an air compressor, a generator set, crane, and concrete truck. Construction activities would occur between 7 a.m. and 7 p.m., in compliance with County of San Diego Noise Ordinance. Construction staging would occur on the project site. Construction may result in partially blocked travel lanes along South Grade Road due to the use of large construction equipment, construction material deliveries, or construction of project features adjacent to South Grade Road. These temporary lane closures could delay or obstruct the movement of emergency vehicles along South Grade Road. However, when construction interrupts the normal function of a roadway, a Traffic Control Permit would be obtained from DPW. County DPR or its contractors would be responsible for obtaining the Traffic Control Permit, which requires the installation and maintenance of appropriate traffic controls, in accordance with a traffic control plan. The traffic control methods used to maintain a safe flow of traffic could include barriers, signs, or flags. Implementation of the traffic control plan would ensure the safe passage of emergency vehicles in the public right-of-way. Additionally, construction activities and the traffic control plan would not prevent emergency vehicles from reaching the project site. County ~~Fire Services~~FPD staff (i.e., County Fire Marshal) review all proposed projects to ensure onsite access is accessible for emergency vehicles and onsite utilities are adequate for emergency response. Therefore, the project would be submitted to the County Fire Marshal for review and approval. In addition, the project would comply with the applicable requirements set forth by the County of San Diego Multi-Jurisdictional Hazard Mitigation Plan and the Operational Area Emergency Operations Plan during an emergency.

### Operation

Operation of the project would include passive and active recreational facilities and would introduce new staff and visitors to the project site, which currently is undeveloped. Main access to the park would be provided on the east side of the property at a new ~~four~~all-way stop-controlled intersection at South Grade Road and Calle de Compadres. A secondary entrance would be constructed at the south end of the park as a driveway into and out of the parking lot. The project would not include any roadway improvements to South Grad<u>e</u> Road, beyond constructing a decomposed granite pathway in the existing right-of-way adjacent to the park. ~~The bike lanes would act as a by-pass in an emergency situation.~~ Staff members would become familiar with the San Diego County WUI Fire Emergency Response Plan for the Alpine southeast area and be prepared to integrate with public safety responders in response to emergencies at this site. Please refer to Appendix K for the Alpine Community Park Fire Evacuation Analysis prepared by Chen Ryan Associates (~~August~~<u>October</u> 2022). This analysis assessed the time required for evacuation from the project site under several scenarios (e.g., a wind-driven fire that results in a required evacuation, affecting the project site and surrounding community).

The traffic evacuation analysis presented in the Alpine Park Fire Evacuation Plan shows the vehicle travel times required under various evacuation events. Nine scenarios were considered. For a conservative scenario, the analysis assumes that all the households, businesses, and vehicles would leave together once an evacuation order is issued. Specifically, the evacuation analysis assumes that up to 240 vehicles would evacuate from the project site. This assumption represents full occupancy of the project site. The analysis also assumes that up to 4,029 vehicles and 4,432 vehicles would evacuate the surrounding land uses under the existing and cumulative scenarios, respectively. Key points from the analysis are provided below. Detailed results and discussions are provided under the respective sections of the analysis provided in Appendix K.

- It would take up to 2 hours and 31 minutes to evacuate existing land uses via South Grade Road and Alpine Boulevard (Scenario 1). If the two-way left-turn lane (TWLTL) along Alpine Boulevard is used as an evacuation lane, then the time is reduced to 1 hour and 33 minutes (Scenario 2).
- Evacuating project traffic only (Scenario 3) would take up to 31 minutes.
- Evacuating all existing land uses and project traffic via South Grade Road and Alpine Boulevard would take up to 2 hours and 40 minutes (Scenario 4). If the TWLTL along Alpine Boulevard is used as an evacuation lane, then the time is reduced to 1 hour and 41 minutes (Scenario 5). Thus, the project increases the total evacuation time by 9 minutes and 8 minutes, respectively.
- Under the cumulative scenario, it would take up to 2 hours and 41 minutes to evacuate the cumulative land uses via South Grade Road and Alpine Boulevard (Scenario 6). If the TWLTL along Alpine Boulevard is used as an evacuation lane, then the time is reduced to 1 hour and 44 minutes (Scenario 7).
- Evacuating all cumulative land uses and the project via South Grade Road and Alpine Boulevard would take up to 2 hours and 53 minutes (Scenario 4). If the TWLTL along Alpine Boulevard is used as an evacuation lane, then the time is reduced to 1 hour and 50 minutes (Scenario 5). Thus, the project increases the total evacuation time by 12 minutes and 6 minutes, respectively.

The project proposes several features that would enhance evacuation operations; these are not reflected in the evacuation scenarios and average evacuation times. These features include the existing and proposed fuel modification zones within the project site as well as the fuel modification

area along the project's frontage (see Figure-4.20-2). In addition, temporary areas for safe refuge would be provided. Because the project would provide a sizable area that would be ignition resistant, emulating urbanized areas where wildfire spread can be halted, emergency managers may halt evacuations at the project site at any point to move higher-priority traffic. The project may also serve as a temporary evacuation point for evacuees from other areas, given its design as a fire-resistant zone.

Neither CEQA nor the County has numerical time standards for determining whether an evacuation timeframe is appropriate. Public safety, not time, is generally the guiding consideration for evaluating impacts related to emergency evacuation. The County considers a project's impact on evacuation significant if it impairs or physically interferes with implementation of an adopted emergency response or evacuation plan, or exposes people or structures to a significant risk of loss, injury, or death from wildland fires.

The evacuation scenarios presented in the analysis found that evacuation traffic generated by the project would not increase average evacuation travel times significantly or result in unsafe evacuation timeframes. The flow of evacuation traffic would be effectively managed. In addition, structural fire, rescue, and emergency medical services in the Local Responsibility Area are provided by Alpine FPD, which staffs its fire stations with personnel from a number of fire service agencies in the Alpine region.

Table 4.15-1, Fire Protection Facilities in the Project Vicinity, in Section 4.15, *Public Services*, indicates the locations and types of fire resources that are available for emergency response. Alpine FPD Station 17 is 2.7 miles away from the project site. Fire service resources at Station 17 are available to the community in less than 5 minutes for an initial response and within 15 minutes for most multi-unit responses; these would be facilitated by the Heartland Dispatch Center and surrounding cooperating fire agencies (Rohde and Associates 2021). Additionally, Rohde and Associates concluded that operation of the project would result in less than one emergency response call per day on average, which was estimated based on the number of daily park users at estimated peak visitation. Alpine FPD Station 17 currently conducts one to three service calls per day with substantial capacity for additional service calls.

Therefore, the project would not increase demand on existing emergency response services such that it would impair an adopted emergency response plan or emergency evacuation plan.

## Impact Determination

The project would not substantially impair an adopted emergency response plan or emergency evacuation plan. Impacts would be less than significant.

## Mitigation Measures

Mitigation is not required.

## Level of Significance After Mitigation

Impacts would be less than significant.

***Threshold 2: Implementation of the project would not, due to slope, prevailing winds, and other factors, exacerbate wildfire risks of, and thereby expose project occupants to~~,~~ pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.***

## County Park ~~and~~, Trails, and Open Space~~/Preserve~~

### Impact Discussion

The project is in an area that, due to the climate, common Santa Ana wind conditions, and topography, is prone to wildfire risk. The project site is identified as a VHFHSZ and has burned during wildland fire events before. The project site slopes to the south, with the more substantial slopes on the northern end of the project site. The highest elevation is approximately 2,030 feet at the northern site boundary and the lowest is approximately 1,970 feet at the southern boundary.

#### Construction

As noted, the project site is partially within a VHFHSZ, and heat or sparks from construction equipment or vehicles, as well as the use of flammable materials, have the potential to ignite adjacent vegetation and start a fire, especially during weather events that include low humidity and high wind speeds that are typically experienced in the summer and fall, but can occur year-round in the San Diego region. County DPR and its contractors would implement the following standard best management practices (BMPs) intended for the mitigation of potential ignition sources, including:

- All vehicles would be required to carry a fire extinguisher in case of accidental fire ignition,
- Vehicles would not be permitted to park or idle over dry brush, and
- Proper wildfire awareness, reporting, and suppression training will be provided to construction personnel.

Implementation of standard BMPs would reduce the potential for ignition and increase the ability of on-site workers and staff to control and extinguish a wildfire event. Therefore, construction of the project would not exacerbate the conditions and wildfire risk on site, thereby exposing people to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.

#### Operation

Operation of the project could introduce new conditions that could exacerbate wildfire risk at the project site. While development of the project would reduce the fuel load on the project site by developing natural habitat with built environment, operation of the project would introduce visitors to the project site that were not previously present. Given the high percentage of wildfires in Southern California that are ignited by human-related causes, this could exacerbate the existing wildfire risks on site.

The project would comply with ~~County Code of Regulatory Ordinances~~ Title ~~3~~9, Division ~~5, Chapter 3, and Appendix II-A~~1, of the ~~Uniform~~CFC and the County Consolidated Fire Code. Furthermore, County DPR would be required to comply with the Defensible Space for Fire Protection Ordinance (2011). The ordinance requires combustible vegetation; dead, dying, or diseased trees; green waste; rubbish; or other flammable materials to be cleared within 30 feet of the property line and within 10 feet of each side of a highway, private road, or driveway in order to maintain defensible space

(County of San Diego 2011c). The project is also required to comply with the County of San Diego Fire Service Conditions stipulated by County ~~Fire Services~~FPD personnel (i.e., County Fire Marshal) upon review and approval of the project.

Access to the park has been designed in coordination with County DPR, the County Department of Public Works, and County ~~Fire Services~~FPD personnel to ensure accommodation for large pieces of fire apparatus and horse trailers as they enter and exit. In addition, as part of project operations, signs with park rules and regulations would be clearly posted, in compliance with County Code of Regulatory Ordinances Title 4, Public Property, Division 1, Parks and Recreation, Chapter 1, County Parks and Recreation. The rules, which would be enforced by park employees, would include, but not be limited to, the following:

- Smoking would be prohibited.
- Campfires and open flames would be prohibited, and barbeques would be locked on red-flag days. County DPR has procedures for the enforcement of "open flame bans," which are initiated by declaration of a red-flag warning. County DPR would integrate signage and other interpretive stations at key site entrance points, indicating red-flag conditions when announced by fire agencies. When a warning is issued, region managers would reach out to the field staff and begin the process of shutting down all barbeques by signing and banning/taping them off until the warning is lifted. Additional signage would be posted at park entrances and throughout the park. Park personnel would patrol the park to enforce the ban.
- No person would be allowed to use, transport, carry, fire, or discharge any fireworks, firearm, weapon, air gun, archery device, slingshot, or explosive of any kind across, in, or into a County ~~p~~Park.
- Parking would occur in designated staging areas.

County DPR would prepare a Site Evacuation Plan as part of operational planning for the project. The Site Evacuation Plan would include emergency contact information, evacuation routes and established meeting places, and safety protocols to ensure the safe evacuation of visitors and employees of the park. County DPR would also implement the recommendations provided in the FEOA prepared by Rohde and Associates for the project, as outlined below.

Because the project would introduce potential ignition sources to a previously undeveloped open space area, fire prevention protocols would be implemented as part of the project. The following fire prevention protocols, which were recommended in the Rohde and Associates assessment, would be implemented as project design features:

- Facility Fire-Safe Design. County DPR shall design appropriate facility elements and ensure County fire and building code compliance to reduce wildfire risks for users and the area. Fire-resistive landscaping would create a fire-safe area where the two dog parks, ~~three soccer~~multi-use/open fields, and baseball diamond are proposed. In addition, the paved parking lot, basketball and pickleball courts, equestrian area, and other cleared areas would not only provide a buffer that would protect the park from wildfire but also provide a temporary safe refuge area with safe ingress and egress ~~(Rohde and Associates 2021).~~ .
- All landscape vegetation on park premises would be consistent with the guidelines of the County ~~Department of~~ Planning & Development Services as well as the County's approved fire-resistive landscape plant palette. Generally, these plants would:
    - Grow close to the ground;

  - Have a low sap or resin content;
  - Grow without accumulating dead branches, needles, or leaves;
  - Be easily maintained and pruned;
  - Be drought tolerant;
  - Be responsive to adequate irrigation to maintain a "green" state; and
  - Not present intense thermal outputs during combustion.

- Parking and equestrian areas would serve as emergency safe routes, providing broad expanses of non-combustible surfaces. These areas would be free of combustible ground cover and cleared of native vegetation whenever possible. Fuel modification within adjacent native vegetation may be used in coordination with development in these areas when necessary to achieve the minimum recommended fuel clearance widths. Because equestrians would most likely use County facilities as temporary safe refuge sites during wildfires, the equestrian facility would need to be designed to be both substantial and fire resistive so as to provide secure and safe housing for large animals and prevent accidental releases due to animal panicking during wildfires.
- Fuel Modification Program. County DPR shall implement a long-term fuel modification program. This management would be accomplished on a scale needed to alleviate identified fire behavior potential while limiting environmental impacts from the treatment and offering the highest protection value for the expense and effort. The goals of this fuel modification program would be to reduce wildfire intensity enough to offer reasonable protection to adjacent structural assets, limit landowner liability from wildfire damage to adjoining properties, provide protection for DPR/BCLT site development, and ensure safe public refuge at key sites. Existing fuel modification maintenance includes a 30-foot buffer of vegetation clearance along the northern frontage of South Grade Road of the County property and a 100-foot buffer of vegetation clearance and defensible space at adjoining properties along the boundary of the County-owned parcel, as directed by the Alpine FPD Defensible Space Requirements (Alpine FPD 2022). This document is attached as Appendix L. The County will specifically implement a 100-foot buffer of vegetation clearance that extends from the volunteer pad, an additional 20-foot buffer of vegetation clearance adjoining the 30-foot buffer of vegetation clearance (total of 50-foot buffer clearance) adjacent to the roadside within the proposed park footprint, as well as a 20-foot buffer adjoining the 30-foot buffer approximately 100 feet south of the northeast corner of the County's parcel in order to reduce hazards associated with increased human-related fire ignition factors. The aggregate 50-foot vegetation clearance and 30-foot vegetation clearance also reduce an extension of wildfire from the historical wildfire corridor on the east face of the site.
- The project also shall achieve Zone A–compliant fuel modification around the Alpine Park facility per fire and building code requirements, with the goal of 100 percent fire exclusion from the project site. The objective of landscape replacement in Zone A will be to eliminate the potential for wildfire occurrence through establishment of a fire-resistive landscape around principal park facilities and structures at the minimum distances required by code. This has been designed through the proposed landscape around sports fields and buildings, subject to Alpine Fire Marshal review and approval during the permitting process ~~(Rohde and Associates 2021).~~ Zone B fuel reduction shall occur adjacent to Zone A along property lines, where practical, and around key public facilities such as the parking areas, equestrian staging areas, and similar locations. Fuel modification in Zone B should be designed to achieve fire prevention

goals while maintaining viable habitat and preserving ecological values. The objective of fuel treatment in Zone B is to achieve at least a 75 percent reduction in fire-line intensity from a wildfire moving from native fuels into a constructed fuel modification zone ~~(Rhode and Associates 2021).~~. The County will implement a 100-foot fuel reduction area extending from the volunteer pad under Zone A and Zone B compliance.

- Fuel Modification Criteria: A–O in FEOA (Appendix J)
    - Treatment Methods. County DPR shall implement one or more of the recommended treatment method alternatives, including:
        - Mechanical treatment, including mowing or plowing, may be used to establish fuel modification in grass where terrain is within the mechanical limits of equipment to extend parking lot or equestrian staging area clearance for safe refuge.
        - Grazing for grass and lighter fueled sites such as sage scrub in the south half or northwest quarter.
        - Hand treatment by hand crews is recommended for steep sites and sites with heavy fuels such as shrub fuel and steep-sloped areas in the northwest quarter of the combined site.
        - Spot control with herbicides. Herbicides would be used to control undesired weeds or selective vegetation within fuel modification areas.
- Partner Collaboration for Fire Prevention. County DPR shall coordinate with neighboring entities, including BCLT, ~~Greater~~ Alpine Fire Safe Counsel, the Alpine FPD, San Diego County FPD, CAL FIRE, County ~~Road~~ Department of Public Works, and San Diego Gas & Electric, on regional defensible-space initiatives, fuel modification, and structural defense initiatives, including sharing of resources, planning, and costs.
- Comply with the Regional Wildfire and Evacuation Plan ~~(see Section 4.20, *Wildfire*).~~ The San Diego County WUI Fire Emergency Response Plan has been updated for the Alpine southeast area as a part of the Rohde and Associates FEOA (Appendix J). This document, which is also approved by the San Diego County Fire Chiefs Association and San Diego County Police Chiefs' and Sheriff's Association, is the County standard emergency response and evacuation management plan format for wildfire. County DPR shall implement the project in compliance with the plan.
- Comply with Site-Specific Wildfire and Evacuation Plan. An Alpine Community Park Fire Evacuation Analysis was developed by Chen Ryan Associates (Appendix K) to assess the time required for emergency evacuation from the project site under several scenarios, assuming a wind-driven fire that results in a required evacuation affecting the project site and surrounding community. The traffic evacuation simulations presented within the analysis found that evacuation traffic generated by the project would not significantly increase the average evacuation travel time or result in unsafe evacuation timeframes. Evacuation flow would be able to be effectively managed.

Implementation of the aforementioned project design features, compliance with applicable ordinances and regulations, and enforcement of County DPR rules and regulations would reduce the potential for the project to exacerbate wildfire risks due to slope, prevailing winds, and other factors, including risks related to pollutant concentrations as a result of a wildfire or the uncontrolled spread of a wildfire. Impacts would be less than significant.

### Impact Determination

Implementation of the project would not exacerbate wildfire risks due to slope, prevailing winds, and other factors, and thereby would not expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire.

### Mitigation Measures

No mitigation is required.

### Level of Significance After Mitigation

Impacts would be less than significant.

***Threshold 3: Implementation of the project would not require the installation or maintenance of associated infrastructure, such as roads, fuel breaks, emergency water sources, power lines, or other utilities, that may exacerbate fire risk or result in temporary or ongoing impacts on the environment.***

## County Park, Trails, and Open Space~~/Preserve~~

### Impact Discussion

#### Construction

The project would require the construction of infrastructure specific to wildfire protection (i.e., roads, fuel breaks, emergency water sources, electric or other utilities). Furthermore, the project would require infrastructure improvements as the currently vacant site is developed with an active park and passive recreational facilities. The infrastructure would include a domestic water line, an irrigation water line, a fire service line, storm drains, sewer lines, a fire hydrant, and electricity distribution lines. ~~Construction~~The following analysis was prepared assuming construction of the infrastructure improvements would occur during ~~the single~~one construction phase and would use the same construction equipment as previously listed. Construction personnel would comply with the standard construction BMPs to avoid or minimize potential wildfire risks during construction. The other potential environmental impacts that could arise from construction of the project are analyzed in Sections 4.1 through 4.19 of this Final EIR.

Given its partial location within a VHFHSZ, the project would be required to maintain defensible space around project infrastructure, consistent with PRC Section 4291 and the Defensible Space for Fire Protection Ordinance. ~~The~~ County DPR would collaborate with the BCLT to construct fuel breaks on adjacent BCLT parcels. Furthermore, ~~the~~ County DPR and its contractors would implement BMPs for the mitigation of impacts associated with potential ignition sources while constructing the fuel breaks.

The project would also comply with all applicable CBC and CFC requirements for development in a VHFHSZ, including, but not limited to, specific requirements for structural hardening, water supply and flow, hydrant and standpipe spacing, signage, and fire department access. Therefore, the project would not require the installation or maintenance of associated infrastructure that may exacerbate fire risks or result in temporary or ongoing impacts on the environment.

#### Operation

The project would include operation of the above-mentioned utilities. Maintenance of this infrastructure would occur infrequently throughout the life of the project. Because the project would comply with PRC Section 4291, the Defensible Space for Fire Protection Ordinance, all applicable CBC and CFC requirements for development in a VHFHSZ, and the Operational Area Emergency Operations Plan, its potential to exacerbate wildfire risk on site would be reduced. The presence and ongoing maintenance of infrastructure on the project site would not introduce any specific conditions that would result in exacerbation of wildfire risk any more than operation of the rest of the project facilities. Additionally, the potential ongoing environmental impacts caused by operation of the project infrastructure are analyzed in Sections 4.1 through 4.19 of this Final EIR. Therefore, the project would not require the installation or maintenance of associated infrastructure that may exacerbate fire risk or result in temporary or ongoing impacts on the environment.

### Impact Determination

The project would require the installation or maintenance of infrastructure such as roads, fuel breaks, emergency water sources, power lines, or other utilities. ~~The~~ County DPR would collaborate with the BCLT to construct fuel breaks on the adjacent BCLT parcels. Furthermore, ~~the~~ County DPR and its contractors would implement standard BMPs for the mitigation of impacts associated with potential ignition sources while constructing the fuel breaks. The project would also comply with all applicable CBC and CFC requirements; therefore, implementation of project would not exacerbate fire risks or result in temporary or ongoing impacts on the environment. Impacts would be less than significant.

### Mitigation Measures

Mitigation is not required.

### Level of Significance After Mitigation

Impacts would be less than significant.

***Threshold 4: The project would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.***

## County Park ~~and~~, Trails, and Open Space~~/Preserve~~

### Impact Discussion

Wildfires can greatly reduce the amount of vegetation on hillsides. Plant roots stabilize the soil, and above-ground plant parts slow water, allowing it to percolate into the soil. Removal of surface vegetation resulting from a wildfire reduces the ability of the soil surface to absorb rainwater and can allow for increased runoff that may include large amounts of debris. If hydrophobic conditions exist post-fire, the rate of surface water runoff is increased as percolation of water into the soil profile is reduced (DeGomez 2011).

Downslope or downstream flooding, mudflows, and landslides are common in areas where steep hillsides and embankments are present and such conditions would be exacerbated in a post-fire

environment where vegetative cover has been removed. Additionally, increases in surface runoff and erosion are possible in a post-fire environment where surface vegetation has been removed and steep slopes can increase runoff flow velocity. As presented in Section 4.7, *Geology and Soils*, the project site is gently sloping and is underlain by erosive soils.

### Construction

Construction activities for the project would involve earthwork, which would remove the ground cover and disturb surface soils, exposing loose soils and potentially increasing erosion, which could result in post-fire slope instability if a fire were to occur during construction. However, as detailed in Section 4.7, *Geology and Soils*, and Section 4.10, *Hydrology and Water Quality*, the project would be required to prepare and implement a Stormwater Pollution Prevention Plan outlining BMPs for the construction phase to prevent soil erosion and stormwater runoff, which would remove soil material from the project site and further reduce absorption. Additionally, a Stormwater Quality Management Plan would be prepared for the project site consistent with the requirements of the County of San Diego BMP Design Manual, which would contain site-specific design measures, source controls, and/or treatment control BMPs such as landscaped areas, berms, and stormwater retention basins to reduce potential pollutants, including sediment from erosion or siltation. Furthermore, development in the northernmost portion of the project site, which is the most sloped, would be minimal and would retain several groves of existing trees and areas of existing vegetation. Maintaining existing vegetation would maintain stability along the slope. Additionally, an existing dirt footpath would be protected in place and would not undergo ground-disturbing activities. The central and southern portions of the project site would involve substantial grading to support the proposed development as well as the proposed berm along the eastern side. However, the project site will still slope gradually from the north to the south. The graded areas would be revegetated with approved, native, fire-resistant species once construction is complete. Construction would alter drainage patterns on the site, but construction would also include drainage features such as culverts, storm drains, biofiltration basins, and catch basins designed to minimize stormwater runoff and erosion from the site. All of these features would reduce runoff, slope stability, and drainage changes that could potentially result in significant risks, including downslope or downstream flooding or landslides.

### Operation

Operation of the project would include the development of active recreation facilities with impervious surfaces, including the equestrian staging area, parking areas, the paved walkway, courts, restrooms, and an administration building. Impervious surfaces result in more stormwater runoff than the existing natural habitat on the project site. However, the project is designed with natural vegetation surrounding the developed areas of the park and the entirety of the project site. Revegetation, as well as project design features including drainage culverts, biofiltration basins, storm drains and catch basins, would reduce runoff and erosion conditions on site. There would be no steep slopes on the project site and, where the project site consists of a gradual slope, there would be either active park facilities or vegetated open space~~/preserve~~; these features would not exacerbate conditions such as slope instability that would result in downslope or downstream flooding or landslides, or other significant risks.

### Impact Determination

The project would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. Because of the gradual slope of the project site, the proposed design features, and implementation of construction BMPs, impacts would be less than significant.

### Mitigation Measures

Mitigation is not required.

### Level of Significance After Mitigation

Impacts would be less than significant.

## 4.20.7 Summary of Significant Impacts

There would be no significant impacts related to wildfire.