



Land Development
Review Division
(619) 446-5460

BINDER

Environmental Impact Report

LDR No. 99-1094
SCH No. 2000011053

SUBJECT: Rancho Encantada Precise Plan. AMENDMENTS to the CITY OF SAN DIEGO PROGRESS GUIDE AND GENERAL PLAN (GPA), PRECISE PLAN, REZONE (RZ), VESTING TENTATIVE MAPS (VTM), PLANNED RESIDENTIAL DEVELOPMENT (PRD) PERMITS, and RESOURCE PROTECTION ORDINANCE (RPO) PERMITS to amend the existing Progress Guide and General Plan to rezone lands from IL-3-1 (formerly M1-A) and IH-2-1 (formerly M2-A) to AR-1-1 (formerly A-1-10), and adopt a Precise Plan for the approximately 2,658-acre Beeler Canyon Future Urbanizing Area (FUA). Separate VTM, PRD, and RPO Permits are proposed for the development of the following parcels: Montecito Subdivision (LDR No. 99-0295), and Sycamore Estates (LDR No. 99-0899). The Montecito Subdivision proposes to grade 3.16 million cubic yards of earth on 153 acres and subdivide a 278-acre site into 317 lots to construct 277 single-family residences; create 36 open space lots totaling 125 acres; and preserve an existing residence on a 1.7-acre lot. The Sycamore Estates project proposes to grade 14.9 million cubic yards of earth on 590 acres and subdivide a 2,132-acre site into 631 lots to construct 557 single-family residences; construct 106 multi-family units on an 9.9-acre parcel; create two lots totaling 13.9 acres to allow for future institutional uses; construct a 4-acre neighborhood park and 12-acre elementary school site; and create 11 open space lots totaling 1,498.6 acres. The project also proposes a Multiple Habitat Planning Area (MHPA) Boundary Adjustment that would remove 35.6 acres of existing MHPA lands and add 383.9 acres of non-MHPA lands to the MHPA (a 348.3-acre net addition to the MHPA). The 2,658-acre precise plan area is located east of Pomerado Road, west of the Sycamore Canyon County Open Space Preserve, south of Beeler Canyon Road, and north of MCAS Miramar (Portion of the SE ¼ of the SE ¼, Section 26, and Portion of Section 25, Township 14 South, Range 2 West, and Section 19, 20, 21, 22, 28, 29 and 30, Township 14 South, Range 1 West, Poway Quadrangle, San Bernadino Base Meridian). Applicants: McMillin Homes II & Pacific Land & Investment Company, LLC.

UPDATE:

Since circulation of the Draft Environmental Impact Report (DEIR) and in response to comments received on the DEIR, several modifications to the project have occurred which have resulted in

changes to the Final Environmental Impact Report (FEIR). Changes made in the FEIR are shown in a ~~strikeout~~/underline format to facilitate review.

In accordance with direction from City staff, the applicant has reduced the number of single-family residential dwelling units proposed in the project by six, reducing the total number of dwelling units from a maximum of 941 to 936. In addition, the project applicant is proposing to enter into an agreement with the City which, among other provisions, obligates Sycamore Estates to convey Park Land to the City on the Sycamore Estates sub-project site for the expansion of the Mission Trails Regional Park and to establish an endowment trust fund for the long-term maintenance of conserved property within Sycamore Estates (see FEIR Section 3.8). No new environmental impacts have been identified as a result of these changes to the Project Description.

In response to two issues raised during the public comment period, additional analysis has been added to the FEIR. An analysis of potential water well impacts is added to FEIR Section 4.5, Hydrology/Water Quality, and an analysis of potential construction-related transportation impacts is added to FEIR Section 4.6, Transportation. Staff has concluded that no new significant environmental impacts would occur under these two issue areas.

Traffic Mitigation Measure 4.6-8, which required the construction of a High Occupancy Vehicle (HOV) lane at the I-15/Pomerado Road westbound to southbound on-ramp, has been replaced by an equivalent measure, which states that as an alternative to the construction of the HOV lane, the owner/permittee shall contribute the equivalent cost of the proposed on-ramp widening to the CalTrans improvement program.

The changes made to this environmental document do not affect the impact analysis or the Findings to the EIR.

CONCLUSIONS:

The proposed Rancho Encantada Precise Plan would serve as the City of San Diego's long-range plan for the development of the 2,658-acre Beeler Canyon project area. The Precise Plan proposes 835 single dwelling units, 106 multiple dwelling units, two institutional sites, an elementary school and adjacent park, and the preservation of 1,623.6 acres of open space. The Precise Plan also provides for utility improvements, transportation system and street network, trail system, and architectural, landscaping and lighting design guidelines. The main access road, Rancho Encantada Parkway, is proposed to be constructed in an east/west alignment taking access from Pomerado Road. A secondary access would connect with Beeler Canyon Road to the north. The Precise Plan considers two sewer design options: a gravity system that would flow through Beeler Canyon, and a pump station system that would be located in the Montecito sub-project site.

In addition to the Precise Plan, an independent Planned Residential Development (PRD) Permit and Vesting Tentative Map (VTM) is proposed for the Montecito sub-project and two

independent PRD Permits and one VTM are proposed for the Sycamore Estates sub-project. Although the PRDs and VTMs for the sub-projects are being processed independently by the City of San Diego, the environmental review under the California Environmental Quality Act (CEQA) is comprehensive, covering both sub-projects in this Environmental Impact Report (EIR).

Each sub-project proposes development in accordance with the "Rural Cluster Development" option in Council Policy 600-29, "Maintenance of the Future Urbanizing Area as an Urban Reserve." The Rural Cluster Development option allows development at the density permitted by the property's underlying zone(s), but clustered together in order to promote more efficient land use and open space conservation. The Montecito PRD and VTM designate 277 lots to be developed with single dwelling units under the existing RS-1-8 (formerly R1-40,000) zone. Development of the Montecito site would require 3.6 million cubic yards of balanced grading on 153 acres. The Sycamore Estates PRDs and VTM designate 557 lots to be developed with single-dwelling units under the proposed AR-1-1 (formerly A-1-10) zone, and one lot to be developed with 106 multiple dwelling units. Development of the Sycamore Estates sub-project would require 14.9 million cubic yards of balanced grading on 590 acres.

The evaluation of the environmental issues included in this EIR concludes that the project would result in significant direct environmental impacts in the following area(s): land use, visual quality/landform alteration, biological resources, geology/soils, hydrology/water quality, traffic/circulation, noise, historical resources, paleontological resources, public services (public schools, parks, fire protection), public safety, water conservation, and natural resources. The EIR also concludes that the project would result in significant cumulative impacts associated with visual quality/landform alteration, biological resources, traffic/circulation, hydrology/water quality, air quality, paleontological resources, public services (public schools, solid waste disposal), water conservation and mineral resources. The project proposes to incorporate mitigation measures to reduce all identified significant direct impacts to below a level of significance except for direct land use (Industrial Element inconsistency), visual quality/landform alteration and transportation impacts. No mitigation measures exist to reduce direct land use impacts, while visual quality/landform alteration and transportation impacts would be partially mitigable. Cumulatively significant impacts associated with visual quality/landform alteration, biological resources, hydrology/water quality, transportation, air quality, paleontological resources, public services (landfill capacity), water conservation, and natural resources (mineral resources) and cannot be mitigated at the project level and would remain significant.

SIGNIFICANT UNMITIGATED IMPACTS:

Land Use (Direct): Implementation of the Sycamore Estates project would not be consistent with the Industrial Element of the City of San Diego's "Progress Guide and General Plan," which calls for the protection of manufacturing lands from encroachment by non-manufacturing uses, due to the sub-project's proposed rezone from IL-3-1 (Light Industrial, formerly M-1A) and IH-2-1 (Heavy Industrial, formerly M-1B) to AR-1-1. This loss of industrial land would be considered a significant and unmitigable land use impact because no mitigation measures are

available to eliminate or reduce the proposed project's impact. Only adoption of the No Project-Existing Zoning or No Project-Resource Extraction Alternative would avoid this land use impact.

Visual Quality/Landform Alteration (Direct and Cumulative): Construction of the proposed sub-projects, when considered with other current and future uses and development in the Beeler Canyon area, would contribute to the alteration of the landform and visual quality of the area from that of natural vegetation and topography to artificial landforms and human-made structures, landscaping and uses. These impacts are considered significant on a direct and cumulative level. Implementation of the contour grading techniques on prominent manufactured slopes would reduce, but not eliminate, direct and cumulative landform alteration impacts. Other than the mitigation identified for landform alteration, no mitigation is available to reduce the project's direct and cumulative impacts to visual quality to below a level of significance. Only adoption of the Reduced Project, Reduced Grading or RPO Consistent Alternatives would further reduce the significant direct and cumulative landform alteration and visual quality impacts.

Biological Resources (Cumulative): Construction of the proposed sub-projects would result in cumulatively significant impacts to the White-tailed kite, Cooper's hawk, Northern harrier, other raptors and the Black-tailed jackrabbit, due to the loss of 10.3 acres of native and non-native grasslands and 174.4 acres of coastal sage scrub used by these species as foraging habitat. No mitigation is available to eliminate this cumulative impact. Only selection of the Reduced Project, Reduced Grading or RPO Consistent Alternatives would reduce the cumulative impact.

Hydrology/Water Quality (Cumulative): Implementation of the proposed project, when considered in conjunction with other plans or existing urban development within the Peñasquitos Watershed, could exacerbate the degradation of water quality in Beeler Creek and eventually Los Peñasquitos Lagoon. This impact is considered significant on a cumulative level because although the project would be required to adhere to local and state requirements regarding water quality, the project would contribute incrementally to the degradation of water quality in the drainage basin. No measures are currently available at the project level to fully mitigate the cumulative water quality impacts. Only adoption of the Reduced Project, Reduced Grading or RPO Consistent Alternatives would reduce the proposed project's contribution to cumulative water quality impacts.

Transportation (Direct and Cumulative): The additional traffic generated by the development of the project would result in a direct and cumulatively significant impact on Pomerado Road that would not be mitigable. No mitigation measures are available to eliminate these impacts. Only adoption of either the Reduced Project, Reduced Grading or RPO Consistent Alternatives would partially reduce the significant direct and cumulative traffic impacts on Pomerado Road.

Air Quality (Cumulative): When considered with other projects in the area, implementation of the project would contribute to the non-attainment of clean air standards in the San Diego Air Basin due to an increase in emissions impacts associated with ozone (O₃). The project's incremental contribution is considered a cumulatively significant air quality impact. Because the only potential mitigation available would be the successful county-wide implementation of the

San Diego Air Pollution Control District Regional Air Quality Strategies (RAQS), no mitigation is available at the project level to reduce this impact to below a level of significance. Only adoption of the Reduced Project, Reduced Grading or RPO Consistent Alternatives would reduce the proposed project's contribution to cumulative air quality impacts.

Paleontological Resources (Cumulative): Grading performed during project construction would impact soils with high paleontological resource sensitivity ratings, resulting in potentially significant direct and cumulative impacts. Because paleontological resources are a non-renewable resource, any loss of these resources when considered in combination with losses from other development in the region, would result in a cumulatively significant and unmitigable impact. Only adoption of either the Reduced Project, Reduced Grading or RPO Consistent Alternatives would partially reduce, but not eliminate, the project's potentially significant cumulative impacts to paleontological resources.

Public Services (cumulative): The proposed project's residential and institutional uses would generate approximately 4,346 cubic yards of solid waste per year, which would be regarded as a significant cumulative impact on the region's landfill capacity when considered in combination with other existing and proposed development. The waste reduction mitigation measures identified in this EIR would partially reduce the project's cumulative impact, but not to below a level of significance. No mitigation measures are available to eliminate the cumulatively significant impact. Only adoption of the Reduced Project, Reduced Grading or RPO Consistent Alternatives would partially reduce the project's cumulative impact.

Natural Resources (cumulative): Because the Sycamore Estates sub-project site is mapped by the California Department of Mines and Geology as "an area where adequate information indicated that significant mineral deposits are present, or where there is a high likelihood for their presence," the Sycamore Estates sub-project's elimination of the existing industrial (IL-3-1 and IH-2-1) zone designations and development of the site with residential uses, would incrementally reduce the potential to utilize aggregate resources in the San Diego region, resulting in a significant cumulative impact. No mitigation measures are available to reduce this impact. Only adoption of the No Project-Resource Extraction Alternative would avoid the project's cumulative impact on the supply of mineral resources in the region.

RECOMMENDED ALTERNATIVES FOR REDUCING SIGNIFICANT IMPACTS:

None of the project alternatives analyzed in this EIR, including either of the No Project Alternatives, would completely eliminate all of the significant direct land use, visual quality/landform alteration, and transportation impacts and cumulatively significant visual quality/landform alteration, biological resources, hydrology/water quality, transportation, air quality, paleontological resources, public services (landfill capacity), water conservation, and natural resources (mineral resources) impacts of the proposed project. However, selection of any of the alternatives would reduce or eliminate the proposed project's contribution to one or more of the direct and/or cumulatively significant impacts.

The No Project-Existing Zoning Alternative would avoid direct impacts associated with land use (conflict with the Industrial Element of the Progress Guide and General Plan) by developing the Sycamore Estates site under the existing industrial zones. Direct impacts associated with visual quality/landform alteration (Montecito only), biological resources, geology (erosion), paleontological resources, transportation (Montecito only) and public services (Montecito only) would be lessened. In addition, the project's contribution to cumulative impacts associated with visual quality/landform alteration (Montecito only), biological resources (raptor foraging habitat), hydrology/water quality and paleontological resources would be lessened. The Sycamore Estates sub-project under this alternative would result in increased significant direct and cumulative impacts to visual quality/landform alteration, transportation, noise, air quality, hydrology/water quality and water conservation.

The No Project-Resource Extraction Alternative would avoid significant cumulative impacts to natural resources. For the Montecito sub-project site, impacts would be similar to the impacts discussed in the No Project-Existing Zoning Alternative above. The Sycamore Estates sub-project site would result in reduced impacts to public services and water conservation, and increased impacts to landform alteration (direct and cumulative), biological resources (cumulative), geology (erosion), transportation (direct and cumulative), noise, air quality (cumulative), hydrology/water quality (direct and cumulative), paleontological resources (cumulative) and public safety.

The Reduced Project alternative would provide a proportionate reduction in the amount and severity of significant direct impacts associated with visual quality/landform alteration, biological resources, hydrology/water quality, traffic/circulation, geology (erosion), noise, historical resources, paleontological resources, public services, water conservation and air quality. The Reduced Project Alternative would also reduce cumulative impacts associated with visual quality/landform alteration, biological resources (loss of raptor foraging habitat), hydrology/water quality, air quality, paleontological resources, public services (landfill capacity), water conservation. There would be no change in impacts associated with public safety and natural resources. The Reduced Project Alternative would have increased significant but mitigable impacts associated with traffic and noise along Beeler Canyon Road and fire protection on the project site.

The Reduced Grading Alternative would avoid significant direct landform alteration and historical resources impacts, and decrease significant impacts associated with biological resources, visual quality, geology (erosion), hydrology/water quality, traffic, noise, air quality, paleontological resources and water conservation. Compared to the proposed project, cumulative impacts associated with visual quality/landform alteration, hydrology/water quality, traffic, air quality, paleontological resources, public services (landfill capacity) and water conservation would be reduced. Significant direct impacts to public safety and natural resources and cumulative impacts to biological resources (loss of raptor foraging habitat) would be unchanged. Fire protection impacts may be increased, but would be mitigable as compared to the proposed project.

The RPO Consistent Alternative would avoid impacts to wetlands and historical resources, and reduce impacts associated with visual quality/landform alteration, biological resources, hydrology/water quality, traffic, noise, air quality, paleontological resources, public services (landfill capacity), and water conservation. The RPO Consistent Alternative would also reduce cumulatively significant impacts associated with visual quality/landform alteration, water quality, transportation, air quality, paleontological resources, public services (landfill capacity), biological resources (loss of raptor foraging habitat), and water conservation.

The Reduced Project Alternative would be considered the environmentally superior project alternative because it would have fewer and less severe environmental impacts than the other project alternatives.

Unless project alternatives and associated mitigation measures are adopted, project approval will require the decisionmaker to make Findings, substantiated in the record, which state that: a) individual mitigation measures or project alternatives are infeasible, and b) the overall project is acceptable despite significant impacts because of specific overriding considerations. If the gravity sewer design option is selected for construction in the City of Poway's jurisdiction, the decisionmaker will be required to make the following finding, substantiated in the record, which states that: a) such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.

MITIGATION MONITORING & REPORTING PROGRAM (MMRP) INCORPORATED INTO THE PROJECT:

NOTE: Both the Montecito and Sycamore Estates sub-projects have similar or identical mitigation measures identified in their respective MMRP's, unless specifically stated below.

Land Use (direct): Significant land use impacts associated with the project's inconsistency with the Multiple Species Conservation Plan's (MSCP) Land Use Adjacency Guidelines, which generally require that projects avoid or mitigate potential indirect impacts to biological resources, would be fully avoided with the implementation of the drainage, lighting, noise, barriers,

landscaping and brush management mitigation included in the Biological Resources section (Section 4.3) of the EIR.

Visual Quality/Landform Alteration (direct and cumulative): Each of the sub-projects would partially mitigate significant direct and cumulative impacts associated with visual quality and landform alteration by providing contour grading of visually prominent manufactured slopes in order to blend the artificial slopes into the surrounding natural topography.

Biological Resources (direct, indirect and cumulative): Significant direct impacts to sensitive upland and wetland habitat would be mitigated at the ratios identified in the City's *Biology Guidelines*, which would include a minimum of 1:1 wetland impact to creation mitigation ratio.

Potential impacts to sensitive animal and plant species (Willoway monardella, California gnatcatcher, San Diego horned lizard, Orange-throated whiptail, Western red diamond rattlesnake, Coastal cactus wren, Southern California rufous-crowned sparrow, Northern harrier, Golden eagle and Cooper's hawk) would be avoided through the project's conformance with the MSCP Subarea Plan and the City's *Biology Guidelines*, which require habitat-based mitigation through the preservation of the Multiple Habitat Planning Area (MHPA) preserve, species-specific grading restrictions during the breeding season of sensitive species, and irrigation restrictions in the watershed of the Willoway monardella. To avoid the potential for indirect impacts to wetland habitat adjacent to future construction, the project would be required to provide and fence a minimum 25-foot development and construction buffer around all wetlands. Cumulative impacts due to the loss of raptor foraging habitat would be partially mitigated through the habitat-based mitigation discussed above, but not to below a level of significance. Mitigation for impacts associated with the gravity sewer design option, if selected, would be mitigated in accordance with City of Poway standards.

Geology/Soils (direct): The project's potentially significant impacts associated with the site's geotechnical conditions would be mitigated by requiring that a geotechnical consultant observe grading and earthwork procedures to make recommendations, as necessary. In addition, potential soil erosion impacts would be fully mitigated by requiring that a mitigation monitor oversee grading and earthwork activities to ensure that proper erosion control measures, as identified on each sub-project's grading plans and Storm Water Pollution Prevention Plan (SWPPP), are adhered to during construction.

Hydrology/Water Quality (direct and cumulative): Potentially significant direct impacts to water quality would be mitigated by implementing the project-specific Best Management Practices (BMPs) identified in the Hydrology/Water Quality section of the EIR (Section 4.5) and by preparing and implementing a City-approved SWPPP during construction. BMPs would include erosion and sediment controls during construction, and detention and filtration of site runoff prior to discharging into Beeler Creek. No mitigation is available at the project level to mitigate cumulative water quality impacts.

Transportation (direct and cumulative): Significant direct and cumulative impacts to circulation in the project area would be partially mitigated by assuring the construction of the roadway improvements identified in the Transportation Section (4.6) of the EIR prior to recordation of the first final map. Roadway improvements would occur on Pomerado Road, Stonemill Drive, Scripps Poway Parkway, the northbound I-15 off-ramp at Pomerado Road, ~~the westbound I-15 southbound on-ramp at Pomerado Road~~ the southbound auxiliary lane on I-15 from Mira Mesa Blvd. to Miramar Way, Spring Canyon Road, Spruce Run Drive, Semillon Boulevard Sunset Ridge Drive, Blue Cypress and Scripps Creek Drive. All impacts would be mitigated to below a level of significance except for direct and cumulative impacts to the level of service on Pomerado Road.

Noise (direct): The Montecito sub-project would mitigate potentially significant interior and exterior noise impacts for those homes that would be built within 200 feet of the centerline of

Pomerado Road by preparing an acoustical report based on building plans to identify necessary noise attenuation construction measures to be included in home construction. Such construction measures could include double-paned windows or supplemental ventilation to allow for window closure. The Sycamore Estates sub-project would be required to implement similar mitigation for those homes that would be built within 80 feet of the centerline of the proposed Rancho Encantada Parkway. In addition, both sub-projects would be required to construct a noise attenuation barrier along Rancho Encantada Parkway, as shown on the specific VTMs.

Air Quality (direct and cumulative): To mitigate potential short-term dust impacts during construction, both sub-projects would be required to implement an accelerated dust abatement program during construction to achieve a minimum of 60 percent dust abatement. Mitigation measures would include periodic site watering, truck wash stations, truck covers and soil stabilizers. Because the only potential mitigation available for cumulative long-term air quality impacts would be the successful county-wide implementation of the San Diego Air Pollution Control District Regional Air Quality Strategies (RAQS), no mitigation is available at the project level to reduce this impact to below a level of significance.

Historical Resources (direct): For the Sycamore Estates sub-project, a City-approved archaeological monitoring plan would be required to be implemented during construction to mitigate potential impacts to Site CA-SDI-14027H to below a level of significance.

Paleontological Resources (direct and cumulative): To mitigate any potential impacts to significant paleontological resources that could be destroyed during project grading, each sub-project would be required to implement a paleontological monitoring program, supervised by a qualified paleontologist or paleontological monitor, during project grading. Because no mitigation is available to avoid cumulative impacts other than not developing the site, cumulative impacts would remain significant and unmitigable.

Public Services (direct and cumulative): To mitigate the project's impacts on public schools, each sub-project would be required to contribute Senate Bill 50 fees prior to the issuance of building permits. For impacts to public parks, the Sycamore Estates sub-project would be required to dedicate land for the construction of a public park prior to the issuance of the 500th residential occupancy permit. If the Montecito sub-project develops prior to Sycamore Estates, the Montecito sub-project would be required to pay into the Rancho Encantada Public Facilities Financing Plan (PFFP) prior to the issuance of building permits to cover its 2.46-acre park requirement. To partially mitigate cumulative impacts to landfill capacity, each sub-project would be required to implement a waste reduction program during construction. For the Sycamore Estates sub-project, a fire response analysis would be required prior to the issuance of building permits for each phase to identify any necessary mitigation measures, such as providing sprinklers in each home, for any home that would be located outside of the six-minute response time from an existing fire station.

Public Safety (direct): To mitigate potential impacts to human health and safety, prior to the issuance of grading permits the Sycamore Estates project would be required to properly remove

an existing 4,000-gallon fuel tank and other existing buildings, test soil samples for constituents of concern, conduct a Phase II site assessment, and remove the top 1 foot of soil around historical site CA-SDI-15159H under the direction of a hazardous materials consultant.

Water Conservation (direct and cumulative): To mitigate direct impacts associated with water conservation, each sub-project would be required to use low water use plant species and soil moisture override systems in the landscape plans, and provide low-flow toilets and faucets in the construction plans. No mitigation measures are available at the project level to mitigate cumulative water conservation impacts.

The above-described Mitigation, Monitoring and Reporting Program will require a deposit of \$7,200 to be collected prior to the issuance of the first grading or building permit to ensure the successful completion of the monitoring program.



Lawrence C. Monserrate
Planning & Development Review
Environmental Review Manager

November 22, 2000
Date of Draft Report

June 28, 2001
Date of Final Report

Analyst: Kleis

PUBLIC REVIEW:

The following individuals, organizations, and agencies received a copy or notice of the draft EIR and were invited to comment on its accuracy and sufficiency. Note: an asterisk (*) denotes groups that received notices only:

City of San Diego

Mayor Susan Golding (91)
Councilmember Phil Blair, District 5
Councilmember Judy McCarty, District 7
Planning and Development Review Department (4A, 78, 87, 352)
Wetland Advisory Board (91A)
Environmental Services (93A)

Federal Government

MCAS Miramar, Commanding General (13)
Environmental Protection Agency (19)
Fish and Wildlife Service (23)
Army Corps of Engineers (26)
U.S. Soil Conservation Services (430)

State of California

Caltrans, District 11 (31)
Department of Fish and Game (32, 32A)
Department of Parks and Recreation (40)
Office of Historic Preservation (41)
Resources Agency (43)
Regional Water Quality Control Board (44)
State Clearinghouse (46)
California Air Resources Board (49)
Department of Conservation (61)

San Diego County

Department of Planning and Land Use (68)
Department of Public Works (70)
County Water Authority (73)
Department of Environmental Health (75)

Native American Community

Ron Christman (215)
Louie Guassac (215A)
Kumeyaay Cultural Repatriation Committee (225)
San Pasqual Band of Mission Indians (225K)
Barona Group of Capitan Grande Band of Mission Indians (225A)*

Campo Band of Mission Indians (225B)*
Cuyapaipe Band of Mission Indians (225C)*
Inaja and Cosmit Band of Mission Indians (225D)*
Jamul Indian Village (225E)*
La Posta Band of Mission Indians (225F)*
Manzanita Band of Mission Indians (225G)*
Sycuan Band of Mission Indians (225H)*
Viejas Group of Capitan Grande Band of Mission Indians (225I)*
Mesa Grande Band of Mission Indians (225J)*
Santa Ysabel Band of Diegueño Indians (225L)*
La Jolla Band of Mission Indians (225M)*
Pala Band of Mission Indians (225N)*
Pauma Band of Mission Indians (225O)*
Pechanga Band of Mission Indians (225P)*

San Luiseno Band of Mission Indians/Rincon (225Q)*
Los Coyotes Band of Indians (225R)*

Others

City of Poway (103)
SANDAG (108)
Sierra Club (165)
San Diego Natural History Museum (166)
San Diego Audubon Society (167)
California Native Plant Society (170)
San Diego Regulatory Alert (174)*
The Southwest Center for Biological Diversity (176)
Citizens Coordinate for Century III (179)
Endangered Habitats League (182)
Dr. Florence Shipek (208)
South Coastal Information Center (210)
San Diego Historical Society (211)
Save Our Heritage Organisation (214)
San Diego County Archaeological Society, Inc. (218)
Scripps Ranch Community Planning Group (437)
United States International University (438)
Miramar Ranch North Planning Committee (439)
Scripps Ranch Civic Association (440)
Andy Kean
Nolte & Associates, Inc.

Copies of the draft EIR, the Mitigation Monitoring and Reporting Program and any technical appendices may be reviewed in the office of the Land Development Review Division, or purchased for the cost of reproduction.

RESULTS OF PUBLIC REVIEW:

- No comments were received during the public input period.
- Comments were received but did not address the EIR finding or the accuracy/completeness of the Initial Study. No response is necessary. The letters are attached.
- Comments addressing the findings of the EIR and/or accuracy or completeness of the Initial Study were received during the public input period. The letters and responses follow.

Response to Comments
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LETTER OF COMMENT



U.S. Fish and Wildlife Service
Carlsbad Fish and Wildlife Office
2730 Loker Avenue, West
Carlsbad, CA 92008
(760) 431-9440
FAX (760) 431-9624



California Department of
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JAN 19 2001

Re: Draft Environmental Impact Report (LDR No. 99-1094; SCH No. 2000011053) for the Rancho Encantada Precise Plan, City of San Diego, San Diego County, California (FWS-SD-1244.1)

Attn: Drew Kleis

Dear Mr. Monserrate:

The U.S. Fish and Wildlife Service (Service), and the California Department of Fish and Game (Department), collectively the "Wildlife Agencies," have reviewed the draft Environmental Impact Report (DEIR) and accompanying Technical Appendices for the Rancho Encantada (Beeler Canyon) Precise Plan. The Rancho Encantada project proposes a Precise Plan that would serve as the City of San Diego's long-range plan for the development of the 2,658-acre project area. The project site is located in the City of San Diego east of I-15 and north of Marine Corps Air Station Miramar and lies within the City's Multiple Species Conservation Program (MSCP) planning area. The Precise Plan proposes 835 single-family lots, two institutional sites, 106 multi-family units, an elementary school site and a park site clustered into 12 planning areas. Approximately 75 percent of the site would be retained as open space. The precise plan encompasses two independent proposed developments: the Montecito Subdivision (LDR No. 99-0295) and the Sycamore Estates Subdivision (LDR No. 99-0899). Both of these proposed developments are evaluated in the Rancho Encantada DEIR. Offsite sewer improvements that would occur within the City of Poway are also analyzed in the DEIR.

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The Montecito project would develop 153-acres of the 278-acre site and includes 277 single-family lots and one 1.7-acre lot to accommodate an existing onsite residence, as well as 38 open space lots and a lot reserved for a sewer pump station. The Sycamore Estates project would develop a maximum of 500-acres of the 2,132-acre site and includes 631 lots for 557 single family homes, 106 multi-family units, two lots equaling 13.9-acres for future institutional uses, a 4-acre park, a 12-acre elementary school, and 11 open space lots totaling 1,498.6-acres. A Multiple Habitat Planning Area (MHPA) boundary adjustment is proposed for these two projects

RESPONSE

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The Service's summary of the proposed discretionary actions, project location, and project description are noted. For clarification, and pursuant to the Implementing Agreement by and between the City of San Diego, United States Fish and Wildlife Service (USFWS) and California Department of Fish and Game (CDFG), adjustments to the City's MHPA boundaries may be made with the concurrence of the USFWS and CDFG.

LETTER OF COMMENT

RESPONSE

Mr. Lawrence Monserrat

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that would increase the size of the MHPA by 348.3 net acres. This boundary adjustment has been determined to be functionally equivalent to the existing MHPA by City staff but has not yet been approved by the Wildlife Agencies. With the proposed boundary adjustment all development impacts would occur outside of the MHPA with the exception of a 2.5-acre impact area on the adjacent open space parcel owned by the City of San Diego that would result from the construction of an access road to Sycamore Estates.

1

Our comments on the above-referenced project are based on information provided in the November 22, 2000, DEIR; Technical Appendices (dated November 21, 2000); previous project-related meetings with your staff; documents associated with the City of San Diego's Multiple Species Conservation Program (MSCP); our knowledge of sensitive biological resources in the project area; and our participation in regional conservation planning efforts.

Biological Resources

As described in the DEIR (Table 4.3-1) the vegetation on the combined Montecito and Sycamore Estates development sites consists of coastal sage scrub (701.9 acres), undifferentiated chaparral (474.9 acres), southern mixed chaparral (508.7 acres), chamise chaparral (332.3 acres), native grassland (34.0 acres), non-native grassland (31.0 acres), coast live oak woodland (10.8 acres), eucalyptus woodland (8.4 acres), riparian scrub (3.06 acres), southern willow scrub (0.17 acre), and mulfat scrub (0.06 acre). Onsite, 0.11 acre is occupied by wet meadow, 2.46 acres by ephemeral drainages, 0.86 acre by natural flood channel, and 0.1 acre by an ephemeral road pool. There is also 74.8 acres of developed land and 135.5 acres of disturbed land onsite.

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One federally and state listed plant species, willow monardella (*Monardella tinoides* ssp. *viminea*), was observed on the project sites. Seven sensitive plant species were observed on the project site including variegated dudleya (*Dudleya variegata*), San Diego goldenstar (*Muilla levelandii*), Mission Canyon bluccup (*Githopsis diffusa* ssp. *filicaulis*), San Diego barrel cactus (*Ferocactus viridescens*), San Diego sagewort (*Artemisia palmeri*), California adder's tongue (*Ophioglossum californicum*), ashy spike-moss (*Selaginella cinerascens*), dwarf plantain (*Plantago erecta*), and owl's clover (*Castilleja exserta*). Twelve sensitive animal species were observed onsite including San Diego horned lizard (*Phrynosoma coronatum blainvilliei*), red diamond rattlesnake (*Crotalus ruber ruber*), orange-throated whiptail, (*Cnemidophorus hyperythrus heldingi*), coastal western whiptail (*Cnemidophorus tigris multiscutatus*), the federally-listed threatened coastal California gnatcatcher (*Poliopitula californica californica*), California horned lark (*Eremophila alpestris actia*), white-tailed kite (*Elanus leucurus*), Cooper's hawk (*Accipiter cooperii*), northern harrier (*Circus cyaneus*), grasshopper sparrow (*Ammodramus savannarum*), and San Diego black-tailed jackrabbit (*Lepus californicus bennettii*). Many of the above-listed species are considered "covered species" under the City's MSCP.

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Project Impacts

According to Table 4.3-5 of the DEIR, proposed project impacts for the Montecito development project total approximately 153.9 acres and consist of: 0.01 acre of natural flood channel, 0.39

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2 The Service's summary of the on-site vegetation communities is noted

3 The southern California rufous-crowned sparrow (*Aimophila ruficeps canescens*) was also observed as noted on Table 4.3-4. The remainder of the comment represents an accurate summary of the sensitive plant and animal species observed on the project site.

4 The Service's summary of the proposed project impacts to biological resources is noted.

Mr. Lawrence Monserrate

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acre of ephemeral drainage, 32.4 acres of coastal sage scrub (CSS), 7.0 acres of CSS/chaparral ecotone, 38.9 acres of southern mixed chaparral, 69.6 acres of chamise chaparral, 2.7 acres of non-native grassland, and 1.4 acres of disturbed land. According to Table 4.3-6 of the DEIR, proposed impacts for the Sycamore Estates development project total approximately 590.5 acres and consist of 0.53 acre of natural flood channel, 0.86 acre of ephemeral drainage, 3.5 acres of native grassland, 0.9 acre of coast live oak woodland, 142.0 acres of coastal sage scrub (CSS), 2.7 acres of CSS/chaparral ecotone, 221.9 acres of southern mixed chaparral, 141.7 acres of chamise chaparral, 4.1 acres of non-native grassland, 0.3 acres of eucalyptus woodland, 36.1 acres of disturbed land, and 35.9 acres of developed land.

Proposed Mitigation

Proposed mitigation for anticipated project impacts is consistent with the City's MSCP Biology Guidelines and includes both onsite preservation and offsite acquisition of habitat. Proposed mitigation for upland impacts for the Montecito development project consists of onsite preservation of approximately 88.9 acres (including 12.3 acres of CSS, 35.0 acres of southern mixed chaparral, 5.7 acres of CSS/chaparral ecotone, 30.3 acre of chamise chaparral, and 5.6 acres of non-native grassland) and offsite preservation of approximately 5.5 acres within the Sycamore Estates MHPA (including 3.8 acres of CSS and 1.7 acres of CSS/chaparral ecotone). Proposed mitigation for upland impacts for the Sycamore Estates development project consists of onsite preservation of approximately 333.4 acres including 3.9 acre of oak woodland, 0.5 acre of native grassland, CSS, 72.0 acres of CSS, 183.5 acres of southern mixed chaparral, 0.2 acre of CSS/chaparral ecotone, 69.5 acres of chamise chaparral, and 3.8 acres of non-native grassland. Proposed mitigation for wetland impacts for both projects consists of onsite creation and enhancement of wetland habitat.

It is important to note that project-related impacts to waters of the United States, including wetlands, and/or streambeds and the adequacy of proposed wetland mitigation need to be evaluated by both the U.S. Army Corps of Engineers (Corps) pursuant to section 404 of the CWA and the Department of Fish and Game pursuant to section 1600 of the Fish and Game Code *et seq.* (Streambed Alteration). The project must also account for the loss of ephemeral stream channels in upland habitats. Ultimately, decisions regarding the appropriate wetland mitigation sites and ratios will be determined by the Corps and the Department as part of their evaluation of project impacts. Therefore, we encourage the applicant to initiate pre-project planning meetings with the Corps and the Department as soon as possible prior to submitting 404 and 1600 applications.

As a responsible agency, the Department's issuance of a Streambed Alteration Agreement requires compliance with the California Environmental Quality Act (CEQA). In most cases the CEQA document published by local jurisdictions may be treated as the document for issuance of the Streambed Alteration Agreement if it adequately addresses all of the Department's concerns. The final EIR (FEIR) should include a thorough analysis of project-related impacts to areas subject to section 1600, and describe avoidance and minimization measures, and how the proposed mitigation complies with the Department's 1600 requirements. If it does not

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The Service's summary of the proposed mitigation measures for impacts to biological resources is noted.

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Mitigation measures 4.3-5, 4.3-7 and 4.3-9 state that prior to issuance of grading permits, necessary CDFG and U.S. Army Corps of Engineers (ACOE) permits shall be obtained and that all wetland mitigation would be contingent upon state and federal resource agency approval. Also, EIR Section 1.5 lists the ACOE, CDFG and USFWS as Responsible and/or Trustee Agencies.

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EIR Section 3.9 states that the issuance of state and federal agency permits are anticipated to be within the scope of the overall Project described in the Program EIR, requiring no further CEQA documentation. It is acknowledged, however, that the determination of CEQA compliance for purposes of section 1600 is the responsibility of the responsible agency. EIR Section 4.3, BIOLOGICAL RESOURCES, analyzes Project related impacts to areas subject to section 1600.

Mr. Lawrence Monretrate

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adequately address 1600 matters, then additional CEQA documentation would need to be developed by the Department for the issuance of the 1600 Agreement.

Willow Monardella

Willow monardella, a state and federally listed endangered species, has been adversely affected by habitat loss and degradation and the resulting changes in downstream hydrology where populations of this species exist. Willow monardella is a covered species under the MSCP and is known to occur in 10 drainages within San Diego County and in one drainage in Baja Norte, Mexico. The two southern drainages consist of approximately 1,250 clumps of willow monardella. Of the populations within the northern eight drainages only three are considered stable, located in Spring, West Sycamore, and Sycamore canyons, which have little or no development in their watersheds. Based on new information from summer 2000 surveys, an estimated seventy-two percent of all known individuals of this species are limited to occurrences in only three drainages: San Clemente, West Sycamore and Sycamore Canyons. Based on a field inspection, the population in San Clemente Canyon appears to be adversely affected by an increase in water from upstream development which is promoting riparian habitat and may be converting an ephemeral stream into a perennial stream. In addition there is evidence of erosion of the streambanks which can remove the floodplain terraces that support willow monardella. The remaining populations of willow monardella are susceptible to modifications of the hydrology within the upstream watershed. Therefore, the Wildlife Agencies recommend that the populations located downstream of the project should be protected by avoiding and minimizing both direct and indirect impacts. This should include avoiding hydrological modifications to areas within drainages upstream of existing willow monardella populations.

The Wildlife Agencies are concerned that the current project design may result in indirect impacts to the willow monardella located within Sycamore and West Sycamore Canyons, both within the MHPA and on MCAS Miramar. In recent meetings with City staff discussing the boundary adjustment to the MHPA for the Montecito and Sycamore Estates development projects, we expressed concern over hydrologic changes that may result from increased urban runoff with project implementation and potential detrimental effects on the downstream willow monardella populations in West Sycamore Canyon. During that meeting we requested that a complete hydrological analysis be conducted for these projects to evaluate anticipated changes to the watersheds that would be affected by these projects. Volume II of the Technical Appendices to the DEIR include the preliminary hydrological analyses for both these development projects. As stated in the *Preliminary Drainage Study, Sycamore Estates (Drainage Study)*, dated October 2000, the hydrologic analysis is not intended to be a design document for storm water runoff conveyance, it simply provides an estimate of existing pre-project hydrologic and rainfall runoff conditions and an estimate of proposed post-development hydrologic and rainfall runoff conditions; a design document would be developed with final project engineering.

As reported in the Drainage Study, it was determined that "Approximately 90% of the study area currently drains northerly into Beeler Canyon. . ." and that "The remaining 10% of the study area currently drains southerly into canyons that cross into Marine Corps Air Station Miramar." Reportedly, the project's potential rainfall runoff changes in this 10 percent area would be

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8 Based on the sensitivity of the willow monardella, the Sycamore Estates sub-project was designed to avoid any increased surface water flows into Western Sycamore Canyon. Mitigation measures have been provided to avoid and minimize any direct and indirect impacts, including: measure 4.3-12, which precludes any irrigation on manufactured slopes draining into the side tributary of Western Sycamore Canyon, and measure 4.3-13, which requires silt fencing and other measures to minimize erosion potential.

9 As noted in the comment, a preliminary drainage study was completed for the Sycamore Estates sub-project. Although the title in the study includes the term "preliminary", the study was done at a level of detail that allowed for a complete analysis of potential impacts to willow monardella. As shown in the drainage study, the project as designed would result in no increased surface water runoff to Western Sycamore Canyon.

10 The Sycamore Estates drainage study addresses impacts to the two drainages referenced by the commentor in Section 4.5, HYDROLOGY/WATER QUALITY of the EIR. The watershed of the easterly drainage of the headwaters of Western Sycamore Canyon would not be impacted by the project. The watershed area of the westerly drainage that supports a population of 23 willow monardella individuals at least 940 feet downstream of project grading would be reduced by approximately 14 percent. This reduction in watershed would reduce flows, not increase them. No irrigated slopes would be allowed to drain into these drainages as stated in mitigation measure 4.3-12. The fill placed in the headwaters of Western Sycamore Canyon was assessed as noted above, with the resulting reduction in runoff. The placement of fill within the watershed does not constitute a hydrologic change in and of itself. The drainage study shows that significant hydrologic changes (significant change in the quantity or character of runoff) have been avoided through design. Compared to the pre-development condition, there would be a zero percent statistical change in average water velocity, maximum depth, and average shear (scour potential) at the location of the 23 willow monardella individuals. Irrigation water applied to landscaped areas on individual lots would not be discharged into the Sycamore Canyon drainage. By design, all urban runoff would be directed to the north. Additionally, manufactured slopes that would be constructed within or would drain into the watershed of the willow monardella would be revegetated using approved plant palettes without supplemental irrigation. This design feature is intended to eliminate the potential that irrigation would adversely affect the species. Potentially significant short-term sedimentation impacts could occur during construction, but this impact would be mitigated by the use of silt fencing or other similar method as detailed by mitigation measure 4.3-13.

Mr. Lawrence Manserrate

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diverted from the southerly-trending drainages to avoid impacts to willowy monardella populations within the Sycamore Canyon drainage by avoiding changes in existing hydrological conditions (i.e., no net change in runoff conditions between pre-project and post-project conditions with a 100-year storm event). While we acknowledge the effort that went into the Drainage Study, we are concerned that potential effects to willowy monardella were not adequately analyzed in the DEIR given the stated purpose of the Drainage Study, "to determine the overall effect the proposed development will have upon the hydrology of the Beecher Canyon Creek watershed" (page 1). Furthermore, the southerly-trending drainages were not considered in the Drainage Study's before-project analysis. The study also did not address other potential hydrologic changes that would occur with development within the two southerly-trending canyons that constitute the headwaters of West Sycamore Canyon Creek. Although the Drainage Study accounts for diversion of rainfall runoff for post-developed conditions from the proposed development area that occurs within the southerly-trending watershed (West Sycamore Canyon), it does not account for potential hydrologic changes with the placement of fill within the watershed, the addition of irrigation water applied to landscaped areas on individual lots, or irrigated areas on revegetated manufactured slopes, that would be constructed within that watershed. We are concerned over the large amount of fill that would be placed in the headwaters to West Sycamore Canyon Creek to accommodate development along the southern edge of Planning Area 7, as depicted on project maps.

Table 3-5 of the MSCP outline the City's responsibilities for the protection of willowy monardella. Within Table 3-5 it is stated that 100% of the major populations of willowy monardella will be preserved and that the most important populations of willowy monardella are located on Miramar, which is not a part of the MSCP. In addition, willowy monardella occurs in drainages and Table 3-5 identifies that additional protection is anticipated based on Fish and Game Code 1600 agreements and the federal wetlands permitting process.

As required by the City's MSCP (see Table 3-5), specific measures must be taken to protect against detrimental edge effects to this species. The Land Use Adjacency Guidelines contained within the MSCP also discuss the City's obligation to assure land uses, planned or existing, adjacent to the MHPA will be regulated to ensure minimal impacts to natural resources within the MHPA. Given the habitat requirements of the willowy monardella, the Wildlife Agencies believe that more than minimal impacts to the Sycamore Canyon drainage and the willowy monardella, both within the MHPA and MCAS Miramar, could occur if incidental urban, irrigation, or stormwater drainage is allowed to enter the occupied drainage. These effects could be in the form of a degradation of water quality, sedimentation, or type conversion of an ephemeral stream to a perennial stream. Therefore, in order to adequately avoid impacts to the willowy monardella population in West Sycamore Canyon, we recommend a boundary line adjustment for this project that would include the areas that lie south of the 1000-foot contour line in Planning Area 7 within the MHPA and allow for development in less sensitive areas.

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All direct impacts to willowy monardella have been avoided. The closest any development would be to a willowy monardella population is approximately 940 feet. A far more significant population of at least 396 individuals is being conserved within open space in the southeastern portion of the site. Existing defense-related industrial facilities currently located at the upper end of the drainage supporting this larger population would be conveyed to the City of San Diego. The City would have the exclusive right to elect which buildings would remain and which buildings would be removed and converted to open space. Uses for the remaining buildings would be compatible with the open space designation.

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The project's design features and mitigation measures would specifically and intentionally preclude incidental urban, irrigation, or stormwater drainage from entering the occupied drainage. Therefore, "more than minimal impacts" have been precluded by design. Mitigation measures 4.3-12 and 4.3-13 are provided to ensure that no significant impacts to the willowy monardella would occur. Specifically, these measures would ensure that no irrigation of slopes draining into Western Sycamore Canyon would be allowed, that no stormwater drainage would enter the canyon, and that water quality and sedimentation issues are addressed. Because there would be a reduction in the size of the watershed, there would be no potential for the type conversion from an ephemeral stream to a perennial stream. Additionally, the request to preclude development south of the 1,000-foot contour line is not necessary because hydrologic impacts have been precluded by the proposed project's design and mitigation.

LETTER OF COMMENT

Mr. Lawrence Monserrate

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We appreciate the opportunity to review and comment on this DEIR. The Wildlife Agencies would like to work with the City and the project applicant to design a boundary adjustment for the Sycamore Estates development project so that impacts to willoway monardella are adequately avoided. If you have any questions pertaining to these comments, please contact Ms. Kim Marsden (Department) at (858) 467-4229 or Mr. Josh Garcia (Service) at (760) 431-9440.

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Sincerely,

Nancy Gilbert

Nancy Gilbert
Assistant Field Supervisor
Carlsbad Field Office
U.S. Fish and Wildlife Service

William E. Tippetts

William E. Tippetts
Habitat Conservation Supervisor
South Coast Regional Manager
California Department of Fish and Game

RESPONSE

13

Comment noted. See response numbers 8 through 12.



Department of Toxic Substances Control

Edwin F. Lowry, Director
5786 Corporate Avenue
Cypress, California 90630



Gray Davis
Governor

Winston H. Hickox
Agency Secretary
California Environmental
Protection Agency

January 4, 2001

Mr. Drew Kleis
City of San Diego
1222 First Avenue, MS 501
San Diego, California 92101-4155

DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE RANCHO ENCANTADA
PRECISE PLAN (SCH #2000011053)

Dear Mr. Kleis:

The Department of Toxic Substances Control (DTSC) has received your draft
Environmental Impact Report (EIR) for the above mentioned Project.

Based on the review of the document, the DTSC comments are as follows:

- 1) The draft EIR needs to identify and determine whether current or historic uses at the Project site have resulted in any release of hazardous wastes/substances at the Project area. 14
- 2) The draft EIR needs to identify any known or potentially contaminated site within the proposed Project area. For all identified sites, the draft EIR needs to evaluate whether conditions at the site pose a threat to human health or the environment. 15
- 3) The draft EIR indicates that a Phase I Environmental Site Assessment was performed on the Montecito sub-project site and that an empty 55-gallon drum and an above ground storage tank of unknown contents were found within that sub-project site. It also indicates that a Phase I Environmental Site Assessment was performed on the Sycamore Estates sub-project site (divided into five operational sites A, B, D, J and K). Site A (formerly General Dynamics' Convair Division and now leased by Raytheon) was found to contain small containers of gasoline, cutting oils, paint resins and propane cylinders. Site B (formerly General Dynamics' Space Systems Division and now occupied by Lockheed-Martin) was 16

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- 14 The San Diego County Hazardous Materials Management Division, under delegation of authority from both the Department of Toxic Substance Control (DTSC) and the Regional Water Quality Control Board, has provided historical and ongoing regulatory oversight of operations on the proposed project site. As disclosed in EIR Section 4.12, Phase I Site Assessments were conducted on the Montecito and Sycamore Estates sub-project sites that identify existing hazardous materials and wastes.
- 15 See response number 14. As disclosed in the EIR, potentially significant hazardous materials impacts could occur on the Sycamore Estates sub-project site. Mitigation measures are provided which would reduce potential impacts to below a level of significance.
- 16 Comments are noted.

Mr. Drew Klefs
January 4, 2001
Page 3

found to contain 0.25 to 5-gallon drums of hydraulic fluids, vacuum oils, paint wastes, adhesive wastes, and small amounts of gasoline and kerosene waste. In addition, the current user of the site is listed as having a hazardous materials inventory that includes gases, gasoline, kerosene, alcohol, oils and Stoddard solvent. A mercury spill is also noted in the draft EIR. Site D (previously occupied by General Dynamics' Space Systems Division and now used by current property owner for auto repair and boat storage) was found to contain two 55-gallon drums, one for Freon and one for Gensolve. In addition, a 500-gallon diesel storage tank was previously on the site. Site J (previously occupied by General Dynamics' Convair and Air Defense Systems Divisions and now occupied by Raytheon) is known to have generated JP10 and paint wastes in the past and currently has two underground storage tanks in place of undisclosed contents. It is also noted in the draft EIR that a 1000-gallon gasoline storage tank was previously removed from the site. Site K (once occupied by General Dynamics' Convair Division and now inactive) is known to have been a Tomahawk missile test site in which the booster engines were tested. The solid propellant used in these boosters included ammonium perchlorate and carboxyl-terminated polybutadiene.

The draft EIR also mentions that there are electrical transformers located on Sites A, B and D which may contain polychlorinated biphenyl. In addition, all sewage from Sites A, B and D is disposed of through septic systems and onsite leach fields. There are five leach fields on Site J and one on Site A. Also, all of the aforementioned Sites are, or were, listed in the HAZMAT database as hazardous materials generators. It is not sufficient to assume that because there is no evidence of a recent hazardous materials release that there have been no releases in the past 40 years that the sites were active. Prior to initiating any construction activities, a thorough environmental assessment should be conducted to determine if a release of hazardous wastes/substances exists at the site. If so, further studies should be carried out to delineate the general extent of the contamination. Also, it is necessary to estimate the potential threat to public health and/or the environment posed by the site. It is necessary to determine if an expedited response action is required to reduce existing or potential threats to public health and the environment. If it is not an immediate threat, final remedy should be implemented in compliance with state regulations and policies.

- 4) Proper environmental investigation and/or remediation are needed with a DTSC or other lead agency approved Workplan. Complete characterization of the soil is needed prior to any excavation or removal action.
- 5) The draft EIR should identify the mechanism to initiate any required investigation and/or remediation for any site that may require remediation, and which government agency will provide appropriate regulatory oversight.

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17) AB 2644 (Calderon), "School Facilities: contamination," passed and signed in September 2000 as urgency legislation, provided that "a Phase I environmental site assessment conducted pursuant to the requirements adopted by the American Society for Testing and Materials for due diligence for commercial real estate transactions satisfies the requirements for conducting a Phase I environmental site assessment unless and until the DTSC adopts final regulations that establish guidelines for a Phase I environmental assessment" This refers to ASTM Standard Practices 1527 (Phase I Environmental Site Assessment Process) and 1528 (Transaction Screen Process). DTSC's letter states that "it is not sufficient to assume that because there is no evidence of a recent hazardous materials release that there have been no releases in the past 40 years that the sites were active. Prior to initiating any construction activities, a thorough environmental assessment should be conducted to determine if a release of hazardous wastes/substances exists at the site." An ASTM Phase I does constitute a thorough environmental assessment and, absent evidence to the contrary, it is acceptable to conclude that "no recognized environmental conditions" have been identified. Section 4.5.1 of the Standard Practice 1527 notes that "no environmental site assessment can wholly eliminate uncertainty regarding the potential for recognized environmental conditions in connection with a property. Both practices recognize reasonable limits of time and cost. Section 4.5.2 of the Standard Practice 1527 states that "appropriate inquiry does not mean exhaustive assessment." A health risk assessment would be developed for each chemical of concern on each site in conjunction with the phase-out of existing on-site facilities. The transformers located on-site would also be tested and removed, if necessary, using appropriate, recognized methodologies for removal and disposal.

18) Relative to the entire project site area, potentially contaminated soils constitute a relatively small percent of the total area. Mitigation measure 4.12-3 requires that soil samples be taken from septic systems, storm water runoff areas, and container storage areas prior to the issuance of grading permits for the Sycamore Estates sub-project site. If contamination is discovered above regulatory levels, remediation would occur to reduce potentially significant impacts to below a level of significance. An approved DTSC workplan would be implemented for proper environmental investigation and/or remediation of contaminated soils.

Mitigation measures 4.12-1 through 4.12-4 identify the time (i.e. prior to grading or building permit issuance) at which measures shall be implemented and the agency that would be responsible for ensuring compliance with the measure.

19) Mitigation measures 4.12-1 through 4.12-4 identify the time (i.e. prior to grading or building permit issuance) at which measures would be implemented and the agency responsible for ensuring compliance with the measure.

LETTER OF COMMENT

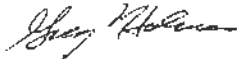
Mr Draw Kleis
January 4, 2001
Page 3

- 6) If during construction of the project, soil contamination is suspected, construction in the area should stop and appropriate Health and Safety procedures should be implemented. If it is determined that contaminated soil exists, the draft EIR should identify how any required investigation and/or remediation will be conducted, and which government agency will provide appropriate regulatory oversight.

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DTSC provides guidance for Preliminary Endangerment Assessment (PEA) preparation and cleanup oversight through the Voluntary Cleanup Program (VCP). For additional information on the VCP or to meet/discuss this matter further, please contact Daniel K. Zogalb, Project Manager, at (714) 484-5483 or me at (714) 484-5461.

Sincerely,



Greg Holmes
Unit Chief
Southern California Cleanup Operations
Cypress Office

cc: Governor's Office of Planning and Research
State Clearinghouse #2000011053
P.O. Box 3044
Sacramento, California 95812-3044

Mr. Guenther W. Moskat, Chief
Planning and Environmental Analysis Section
CEQA Tracking Center
Department of Toxic Substances Control
P.O. Box 806
Sacramento, California 95812-0806

Mr. Michael Dorsey
County of San Diego
Department of Environmental Health
1255 Imperial Avenue, 4th Floor, P.O. Box 129261
San Diego, California 92112-9261

RESPONSE

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Mitigation measure 4.12-6 has been added to the final EIR which requires that "During construction, if any soil contamination is suspected, e.g., by odor or visual means, construction shall temporarily cease at that location and the San Diego County Department of Environmental Health, Hazardous Materials Management Division (HMMD) shall be contacted. A workplan shall be prepared as required by the HMMD, the soil shall be sampled and the results shall be evaluated to determine if any further action would be necessary. If further action is necessary, measures shall be approved by the San Diego County HMMD to ensure appropriate remediation."

LETTER OF COMMENT

DEPARTMENT OF TRANSPORTATION

DISTRICT 11, P.O. BOX 85408, MS-50,
SAN DIEGO, CA 92188-5408
619.688-6954
FAX: 619-688-4299



January 5, 2001

11-SD-015
PM 14.3 (KP 23.0)
Pomerado Road

Mr. Scott Morgan
State Clearinghouse
1400 Tenth Street
Sacramento, CA 95814

Dear Mr. Morgan:

Draft EIR for Rancho Encantada (Sycamore Estates, LDR No. 99-0899 - SCH 2000011053

Caltrans District 11 comments are as follows:

General Comments:

A number of the following comments address portions of the DEIR and/or Traffic Analysis that need clarification or additional explanation. Please address these issues in a revised report.

- The EIR proposes traffic mitigation proposals to the Pomerado/Miramar Interstate 15 (I-15) interchange. Caltrans has active, but underfunded, projects proposed for this interchange and the adjacent I-15 main line. The proposed mitigation may not be completely compatible with the proposed project. However, individual elements of the proposed mitigation may be compatible. 21
- Consideration should be made towards contributing the equivalent cost of the mitigation for the Rancho Encantada project to the proposed Caltrans projects on I-15. This may require a Cooperative Agreement with the City of San Diego to define how the contributions would be determined, collected, and transferred to the currently under-funded Caltrans projects on I-15; 22
- The proposed development's traffic will have impacts to the I-15 ramp intersections at Mira Mesa Boulevard and Scripps Poway Parkway but the report did not have any mitigation measures for these locations. Please address this issue in the revised Traffic Analysis; 23
- The report separately analyzed the operation of each ramp and city street intersection but did not integrate all ramps and intersections in a complete traffic network. Please comment in a revised Traffic Analysis; 24

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RESPONSE

- 21 Clarifications and explanations are set forth in response numbers 22-57. The EIR and the Traffic Technical Report have been revised, where appropriate. No new impacts were identified as a result of the additional analysis conducted with the revisions. Also see response number 102 below.
- 22 Coordination with Caltrans has continued concerning the proposed improvements to the Pomerado Road/Miramar Road Interstate 15 (I-15) interchange. As suggested in the comment, it has now been determined that a component of the proposed mitigation improvement is not compatible with improvements proposed by Caltrans at the same location. The specific element that is not compatible is the widening of the Pomerado Road westbound to I-15 southbound on-ramp to provide an HOV bypass.

The objective of this specific improvement was to help mitigate or reduce the project's contribution to delay at this on-ramp location. However, as noted in Caltrans comment number 49, with which there is agreement, the proposal would not have reduced delay, only the queue on westbound Pomerado would appear shorter.

In this context, it is proposed to modify mitigation measure 4.6-8 as suggested by Caltrans to contribute an equivalent cost (estimated as \$500,000) of the proposed on-ramp widening to the improvement program proposed by Caltrans, specifically the southbound auxiliary lane on I-15 from Mira Mesa Blvd. to Miramar Way. The southbound auxiliary lane is scheduled to be open to traffic in 2004.

This Caltrans improvement would increase traffic flow and capacity for southbound I-15 traffic in the a.m. peak hour, which, in turn, will help to decrease delays at the Pomerado Road westbound to I-15 southbound on-ramp, the original mitigation measure objective.

- 23 Consideration would be given to contributing equivalent cost of mitigation to Caltrans' improvement program. Also see response number 22.
- 24 The traffic study analyzed the noted intersections for ramp delay and intersection delay, and concluded that the project would not have a significant impact at either ramp intersection. Therefore, no mitigation is required. Under Buildout conditions, the I-15/Scripps Poway Parkway interchange is characterized by acceptable LOS D or better conditions during both peak hours both with and without the project. At I-15/Mira Mesa Boulevard, the with project afternoon peak LOS is E; however, the project's contribution toward this congestion would be below a level of significance as defined in the City of San Diego *Traffic Impact Study Manual*. In terms of ramp meter operations, project traffic would not cause a significant impact at either location. Accordingly, no mitigation is required.

LETTER OF COMMENT

RESPONSE

25 Isolated intersection analysis is acceptable under City of San Diego guidelines.

LETTER OF COMMENT

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Additional traffic mitigation proposals were presented to Caltrans during circulation of the Draft EIR. These proposals (not included in the Draft EIR) consisted of improvements to the I-15/Miramar Road and the I-15/Mira Mesa Blvd. interchanges. Further discussion of the additional traffic mitigation proposed will be required. Caltrans has active projects at the same location as the proposed traffic mitigation, which must be coordinated in order to minimize potential conflicts;

26

Specific Comments

Draft EIR Section 4.6 Environmental Analysis - Transportation

- Page 4.6-2, *Level of Service Standard*, last paragraph, second sentence: the latest version of the Highway Capacity Manual (1997) must be used; 27
 - Page 4.6-4, *Existing Traffic Volumes*, first paragraph, first sentence: Figure 4.6-2, *Existing Traffic Volumes*, does not depict the morning and evening peak hour traffic volumes for roadways and intersections in the vicinity of the project site as stated in the text. Please clarify; 28
 - Page 4.6-4, *Existing Traffic Volumes*, second paragraph, first sentence: Figure 4.6-1 does not present existing ADT volumes. Please clarify; 29
 - Page 4.6-4, *Existing Intersection Operation*. Caltrans requires Level of Service (LOS) C or better at State owned facilities, including intersections and ramps. Based on Table 4.6-2, the following intersections are also operating at an unacceptable level of service at peak hours, under existing conditions: 30
 1. Mira Mesa Boulevard/I-15 NB Off Ramp (LOS D, PM peak hour);
 2. Mira Mesa Boulevard/I-15 SB Off Ramp (LOS C, AM peak hour);
 3. Carroll Canyon Road/I-15 NB Off Ramp (LOS D, AM peak hour);
 4. Carroll Canyon Road/I-15 SB Off Ramp (LOS E, AM peak hour and LOS D, PM peak hour);
 5. Pomerado Road/I-15 SB Off Ramp (LOS D, AM peak hour);
 6. Scripps Poway Parkway/I-15 NB Off Ramp (LOS D, AM peak hour);
- Field investigation show that Pomerado Road/I-15 NB off Ramp operates at below LOS B for both AM and PM peak hours as indicated in Table 4.6-2. Please clarify; 31

RESPONSE

26 Coordination with Caltrans will continue. Also see response number 22.

27 At the time the study was initiated, Highway Capacity Manual (HCM) 1994 procedures were still in widespread use, and were considered appropriate by the City of San Diego for analyzing the project's traffic impacts. Accordingly, the requested analysis is not required. However, for informational purposes only, Buildout with and without Project conditions were reanalyzed using the more current 1997 Highway Capacity procedures at sensitive locations (i.e., locations characterized by LOS D or lesser level of service conditions). The evaluation found that the project would not generate any new significant impacts on failing facilities. Accordingly, the findings and conclusions of the Traffic Technical Report included as EIR Appendix E would be unchanged utilizing 1997 procedures.

28 Figure 4.6-2 shows existing ADT volumes for roadway segments. The turning movement volumes are depicted in Figure 2.2-3 (page 15) of the Traffic Technical Report included as Appendix E to the final EIR.

29 Figure 4.6-1 shows the intersection identification numbers. ADTs are presented in Figure 4.6-2.

30 The City of San Diego is the lead agency under CEQA. The significance threshold used in the Traffic Technical Report and EIR are per the requirements of the lead agency, and the City of San Diego has identified LOS D as its performance standard. When an intersection is characterized by an existing congested LOS (E or F), the threshold of significance for impacts established by the City of San Diego is the addition of a two second delay or a two percent increase in traffic.

31 The analysis results were identified using standard procedures. Peak hour turning movement counts were conducted from 7:00 - 9:00 am and 4:00 - 6:00 pm, existing lane geometry was input into the intersection capacity software, and the evaluation was completed using Highway Capacity Manual Chapter 9 procedures.

LETTER OF COMMENT

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- Page 4.6-11, Table 4.6-5, Existing Freeway Segment Analysis: the ADT listed does not match 1999 Caltrans Traffic Volumes. Please clarify; 32
- Page 4.6-16: Project Traffic Distribution
 1. A section connecting Scripps Ranch Boulevard and Pomerado Road does not have the percentage traffic number. Please clarify; 33
 2. Based on the figure numbers, 20% traffic on Spring Canyon Rd. splits to 12% going southwest on Scripps Ranch Blvd. and 10% continues north on Spring Canyon Rd. The 10% traffic on Spring Canyon Rd. then merges with the 8% traffic on Scripps Poway Parkway to get to the I-15 ramps. The figure shows only 10% traffic getting to I-15 ramps. Please comment; 34
- Page 4.6-25, Opening Day with Project Buildout Intersection Analysis, last paragraph, last sentence: the report indicates that "a significant direct impact would occur at one intersection; 35
- Pomerado Road/I-15 Northbound Off-ramp (change from LOS D to LOS E, AM Peak Hour)
 Table 4.6-11, Page 4.6-20, indicates that the change would occur at Mira Mesa Boulevard/I-15 Northbound Off-ramp from LOS D to LOS E in the PM Peak Hour with "NO" significant impact. The Pomerado Road/I-15 Northbound Off-ramp shows LOS B throughout the changes. Please clarify.
- Page 4.6-28, Opening Day with Project Buildout Ramp Meter Analysis: The report indicates that in "Table 4.6-13, the addition of traffic from Project Buildout would result in a significant cumulative impact at the I-15 westbound to southbound Miramar Road/Pomerado Road in the PM peak hour and at the I-15 eastbound to southbound Miramar Road/Pomerado Road in the AM peak hour." 36
 However, Table 4.6-13, Page 4.6-29, shows the I-15 westbound to southbound Miramar Road/Pomerado Road is impacted in the AM peak hour and the I-15 eastbound to southbound Miramar Road/Pomerado Road has no significant impact. Please clarify.

RESPONSE

- 32 The information used in the Traffic Technical Report was obtained from Caltrans Planning Division staff on February 15, 2000, and reflects 1998 volumes. At that time, 1999 Caltrans traffic volumes were not provided by Caltrans.
- 33 The assignment on Scripps Ranch Boulevard north of Pomerado Road is two percent.
- 34 East of Spring Canyon Road, the assignment should be six percent, with four percent passing through the intersection and one percent each oriented to the north and south of the intersection. The percentage west of Spring Canyon Road should be four percent, rather than 10 percent. (Though mislabeled in the figure and since corrected, the analysis was done based on the correct distribution: see Figure 3.2-2 of the Traffic Technical Report attached as Appendix E to the final EIR.) The majority of the 10 percent approaching Scripps Poway Parkway from the south via Spring Canyon Road is oriented to the Scripps Ranch Villages community shopping center and does not proceed to Scripps Poway Parkway.
- 35 The addition of project traffic would cause the Mira Mesa Boulevard/I-5 Northbound Off-Ramp intersection to decline from LOS D to LOS E. By adding 48 afternoon peak hour trips, the project's traffic causes the delay to fall into the LOS E category. Because the project's impact is below the threshold of significance (a 2 second increase in delay), it would not generate a significant impact at this location.
- 36 The text on page 4.6-28 of the draft EIR has been corrected. The table (Table 4.6-13) is correct; the project's sole impact to ramp meter delay is at the I-15/Pomerado Road westbound-to-southbound ramp during the morning peak hour. The text of final EIR page 4.6-28 has been corrected.

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- Page 4.6-32, Buildout 2020 Without Project Daily Traffic Volumes: traffic volume on Scripps Ranch Blvd. decreases from 18,692 to 17,792 between the intersection of Spencerport/Erma and Erma/Mira Mesa Blvd. Please explain. 37
 - Page 4.6-33, Buildout 2020 With Project Daily Traffic Volumes: traffic volume on Scripps Ranch Blvd. decreases from 19,860 to 18,960 between the intersection of Spencerport/Erma and Erma/Mira Mesa Blvd. Please explain. 38
 - Page 4.6-35, Buildout 2020 with Project Buildout Intersection Analysis: the text analysis does not depict the findings in Table 4.6-16. Please clarify and refer to the appropriate table. 39
 - Page 4.6-36, Year 2020 Freeway Segment Analysis With and Without Project Buildout Traffic: Table 4.6-14 mentioned in the text does not specify that the analysis is for the year 2020. Please clarify. 40
- Draft EIR Technical Appendices – Volume III – Traffic Study**
- Page 5, Roadway Segment LOS Methodology: The City of San Diego considers LOS D to be the minimum performance standard in the study area. Add: Caltrans considers LOS C to be the minimum performance standard at freeway/ramp intersections. 41
 - Page 8, CMP Arterial Segment Analysis Methodology: third line, change "... using Highway Capacity Manual" to "1997 Highway Capacity Manual" 42
 - Page 8, CMP Arterial Segment Capacity Methodology: second line, change "... speed and the HCM..." to "... speed and the 1997 HCM..." 43
 - Page 8, CMP Arterial Segment Analysis Methodology: third line, change using Highway Capacity Manual" to "1997 Highway Capacity Manual" 44
 - Page 82, Buildout Traffic Conditions: list No. 3. Where did the 15% reduction factor come from? 45
 - Page 116, Future Transportation Systems Improvements: last sentence. This sentence suggests no mitigation for the additional traffic this project will generate at all affected intersections; 46

RESPONSE

- 37 Comment is noted. The revised analysis indicates that the Scripps Ranch Boulevard segment between Mira Mesa Boulevard and Erma Road would decline from LOS B to LOS C with the change. However, this change would not change the findings and conclusions of the traffic study, since no new mitigation would be required as a consequence of the volume increase. Peak hour intersection analysis indicated that the additional traffic traversing this location would not change LOS under Buildout with Project conditions, and the eastbound right turn lane to be provided by the Scripps Gateway project would restore morning peak LOS to acceptable LOS D conditions.
- 38 See response number 37.
- 39 The reference to the table mis-cited the table number. Table 4.7-2 of the Traffic Technical Report is the correct reference and has been added as Table 4.6-16 of the final EIR
- 40 Tables 4.6-13 and 4.6-14 represent Significance of Ramp Meter Analysis and Significance of Freeway Segment Analysis, respectively. A notation to year 2020 has been added to the buildout condition. Tables 4.6-5 and 4.7-5 of the Traffic Technical Report also can be referred to for this information.
- 41 See response number 30.
- 42 See response number 27.
- 43 See response number 27.
- 44 See response number 27.
- 45 In areas such as the I-15 corridor where there are substantial constraints to peak hour travel demand under existing conditions, a 15 percent decrease or diversion as a consequence of increased congestion would be reasonable to expect. This approach has been used in the past on other projects in the City of San Diego. Based on standard practice and experience of the traffic technical consultant, Kimley-Horn & Associates, the diversion factor was determined to be reasonable.
- 46 This comment is inconsistent with the analysis that was conducted. Existing lanes and intersections were assumed as the base condition. Where the proposed project would impact an intersection, mitigation measures were required. Also see final EIR Section 4.6.4.

LETTER OF COMMENT

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- Page 145, Intersections: first sentence, Caltrans considers LOS C to be the minimum performance standard at freeway/ramp intersections; 47
- Page 162, Intersections Buildout Conditions: list No. 4, Pomerado Road/I-15 NB Off Ramp. ILV calculations are requested for the following intersections: 48
 1. Mira Mesa Blvd SB ramps (AM)
 2. Carroll Canyon Road NB ramps (AM and PM)
 3. Carroll Canyon Road SB ramps (AM and PM)
 4. Pomerado Road NB ramps (AM and PM)
 5. Pomerado Road SB ramps (AM and PM)
 6. Scripps Poway Parkway NB ramps (PM)
- Page 173, I-15 southbound/Pomerado Road westbound: second to last sentence is incorrect, "... but would reduce delay for both HOVs and SOVs waiting to enter the freeway during the morning peak hour" There would **NOT** be a reduction in delay because the ramp meter rate would remain the same. Only the queue on westbound Pomerado Road would appear shorter, the delay would not change; 49
- Page 181, Table 7.1-2: ILV calculations are requested for the following intersections. 50
 1. Mira Mesa Blvd
 2. Carroll Canyon Road
 3. Pomerado Road
 4. Scripps Poway Parkway
 5. Scripps Poway Parkway
 6. Scripps Poway Parkway
- Page 188, Table 7.1-5: Existing Level of Service values for I-15 are below the Transportation Concept Report values. The entire column should read F0; 51
- Page 188, Table 7.1-5: Buildout with Project Level of Service values for I-15 are below the Transportation Concept Report values. The first three lines of column should read F3 and the last four lines should read F2; 52

RESPONSE

- 47 See response number 30.
- 48 See response number 27.
- 49 The commenter is correct in noting that there would not be a reduction in delay for both HOVs and SOVs waiting to enter the freeway during the morning peak hour because the ramp meter rate would remain the same. Also see response number 22.
- 50 See response number 30.
- 51 Caltrans supplied the volume and traffic flow characteristics that were used in the traffic analysis. Based on this comment, the transportation concept report values are not consistent with the volume, peak hour, directional, and heavy vehicle factors supplied from Caltrans.
- 52 See response number 51.

LETTER OF COMMENT

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January 6, 2001
Page 6


- Page 188, *Buildout with Project*: first sentence, "...one additional intersection (Pomerado Road/I-15 northbound off ramp)". ILV calculations may show several intersections are pushed over the 1500 capacity level;

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Continued close coordination with Caltrans is encouraged. If you have any questions on the above comments, please contact Keith Ploettner, Traffic Operation Improvements Engineer, at (619) 688 6659, or Cory Binns, Route Manager at (619) 688-6758.

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Sincerely,



BILL FIGGE, Chief
Development Review and Public Transportation Branch

- c LCarr (MS 27)
- EGojuangco/CBinns (MS 55)
- VHurst (MS 65)
- KPloettner (MS 23)
- GPound (MS 50)
- CThomas (MS 38)
- Ann French Gonsalves, City of San Diego
- Drew Kleis, City of San Diego

53 See response number 30.

54 Comment is noted. Coordination with Caltrans will continue.

State of California

The Resources Agency

MEMORANDUM

To: Project Coordinator
Resources Agency

Date: January 5, 2001

Mr. Drew Kleis
City of San Diego
1222 First Avenue, MS 501
San Diego, CA 92101-4155

From: Department of Conservation
Office of Governmental and Environmental Relations

Subject: Mineral Resource Conservation Comments on the Ranch Encantada Precise
Plan Draft Environmental Impact Report (DEIR) – SCH #2000011053

The California Department of Conservation's Division of Mines and Geology (Division) has reviewed the DEIR for the referenced development project. The Division has responsibility for compiling information on mineral resources in California. The Division produces maps and reports for lead agencies to support land use decisions that conserve important mineral resource deposits. It is with respect to the mineral resource impacts of this project that we offer the following comments:

The proposed project site is within an area of significant mineral resources as designated by the State Mining and Geology Board. (Please reference in the final EIR, the Division's report, *Update of Mineral Land Classification: Aggregate Materials in the Western San Diego County Production-Consumption Region*, 1996, by R.V. Miller, OFR 96-04 (Plate 11)). The final EIR should describe the project's impacts on the future availability of this designated mineral resource. If the availability of this or other regionally significant mineral resources will be adversely affected, project alternatives or mitigation measures should be proposed. Also, if the availability of mineral resources will be impacted, we recommend that the final EIR discuss alternative mineral resource areas that could meet the future demand for aggregate in the Western San Diego Production-Consumption Region. Finally, the final EIR would be the appropriate place to address the requirements of the Surface Mining and Reclamation Act (SMARA) with respect to permitting incompatible uses on designated lands (Public Resources Code Section 2763).

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55 The noted reference has been added to Section 10.0, REFERENCES. The final EIR concludes that there would be a significant and unmitigable cumulative impact to mineral resources due to the preclusion of mining on approximately two percent of the Western San Diego County P-C Region's mapped 11,000 million tons of aggregate resources. The Mineral Resource Extraction Alternative included in EIR Section 9.3 was developed because the site is within an area of significant mineral resources. This alternative would avoid this cumulative impact through establishment of a resource extraction operation on approximately 847.5 acres of the Sycamore Estates sub-project site. Alternative mineral resource areas in the San Diego County P-C Region are mapped by the Department of Conservation, Division of Mines and Geology in Special Report No. 153. The feasibility of obtaining permits for the mining of these alternative mineral resource areas is speculative in nature given in large part to the City's MHPA existing in this same area, and pursuant to the State CEQA Guidelines is beyond the scope of this EIR.

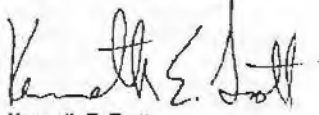
56 A majority of the proposed project site is mapped as an area of regional significance by the California Department of Conservation, Division of Mines and Geology. SMARA requires that prior to permitting a use which would threaten the potential to extract minerals in that area, the lead agency shall prepare a statement specifying its reasons for permitting the proposed use and consider the importance of these minerals to their market region as a whole and not just their importance to the lead agency's area of jurisdiction. CEQA requires the decision-maker to balance the benefits of a proposed project against its unavoidable environmental risks in determining whether to approve the project. The preclusion of mining on the project site is identified in the final EIR as an unavoidable significant environmental impact. Statements specifying the lead agency's reasons for permitting the proposed project will be included in a Statement of Overriding Considerations which will be included in the record of the project approval.

LETTER OF COMMENT

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Mr. Drew Kleis
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Thank you for the opportunity to review and comment on the DEIR. Should you have questions about our comments, or require technical assistance or information on mineral resource issues, please contact Division Senior Geologist, Les Youngs, at 801 K Street, MS 8-38, Sacramento, CA 95814; or, phone (916) 322-1083. You may also call me at (916) 445-8733.



Kenneth E. Trott
Environmental Coordinator

cc: Robert Hill, Supervising Geologist
Division of Mines and Geology

Les Youngs, Senior Geologist
Division of Mines and Geology

^{RLH}
Geologic and ~~ecologic~~ comments prepared by:

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California Registered Geologist/Geophysicist

Ra 3286
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GARY L. PRYOR
DIRECTOR
APR 19 2001

County of San Diego

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January 4, 2001

City of San Diego
Land Development Review Division
Attention: Lawrence C Monserrate
1222 First Avenue, Fifth Floor
San Diego, CA 92101

RANCHO ENCANTADA PRECISE PLAN – DRAFT ENVIRONMENTAL IMPACT REPORT PUBLIC REVIEW COMMENTS

Dear Mr. Monserrate:

The County of San Diego has received and reviewed the draft Environmental Impact Report (EIR) for the Rancho Encantada Precise Plan. In response to the draft EIR the County has the following specific comments and recommendations for the project to address potentially significant impacts that will have an effect on the unincorporated lands of San Diego County and inadequacies in the draft EIR.

BIOLOGY COMMENTS

The County of San Diego, Department of Planning and Land Use, Resource Planning Division and MSCP Division staff have reviewed the Montecito and Sycamore Estates Biology Reports that were prepared by Helix Environmental Planning, Inc., dated October 3, 2000 and September 18, 2000 respectively. The following are our comments on the biological reports and biological sections of the draft EIR. These comments are focused on inadequacies in the draft EIR and recommend improvements.

1. County of San Diego staff feel that the proposed adjustment to the current MHPA will significantly constrict established Beeler Canyon Regional Wildlife Corridor that is a component of the City of San Diego's MSCP preserve system. As a result of this potential reduction of this established corridor, additional stress may be placed on other City wildlife corridors potentially limiting connectivity and increasing stress on County established wildlife corridors, specifically the County's Sycamore Canyon

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Issue number 2 on EIR pages 4.3-43 through 4.3-45 discusses the regional corridor issue for the project. The project as proposed would significantly increase the mapped Beeler Canyon corridor width over much of its length compared with the width approved as part of the Multiple Species Conservation Program (MSCP). With the proposed project, approximately 74 percent of the MHPA development boundary would be pulled back from the MHPA boundary depicted in the MSCP. The MHPA would be adjusted slightly (less than 100 feet) further to the east in Planning Area 11, which is over one mile west of County of San Diego open space. Existing ongoing defense-related industrial uses extend approximately 3,000 feet further to the east than the proposed project and have occurred on the site since the 1960's. As part of the proposed project, the existing industrial buildings would be conveyed to the City of San Diego. The City would have the exclusive right to elect which buildings would remain and which would be removed and converted to open space. Remaining buildings would be put to a use consistent with the open space designation. The phasing-out of industrial uses and the removal of existing fencing around the industrial uses would enhance the value of the eastern open space area for wildlife use. This would enhance use of the open space onsite, and with Sycamore Canyon offsite, would function as the primary north-south wildlife movement corridor for this portion of the County.

The Montecito sub-project of Rancho Encantada does encroach into Beeler Canyon. The on-site portion of the MHPA in this area borders City of Poway open space, although there are approximately 10 existing homes along Beeler Canyon Road directly to the north of the site. In addition, there are two existing homes within the MHPA in this area. The width of the undeveloped portion of Beeler Canyon within the City of Poway ranges from approximately 1,200 feet to 1,600 feet. The current width of the MHPA corridor within the City of San Diego in this area ranges from approximately 750 feet to 1,500 feet and adds to the wildlife corridor on the City of Poway lands. The current total width of the wildlife corridor is approximately 1,950 feet to 3,100 feet, excluding the homes between the site and the City of Poway. The width of the area of the MHPA being encroached upon by the Montecito sub-project ranges from approximately 100 feet to approximately 750 feet. The distance between proposed house pads and the closest existing home in Beeler Canyon would be approximately 450 feet, with a vertical separation of approximately 150 feet. The remaining habitat in the narrowest portion of this area (approximately 550 feet long) is fenced and consists of non-native grassland and disturbed habitats including an existing home, which would provide little vegetative cover, and may not be conducive to wildlife movement or refuge.

LETTER OF COMMENT

RESPONSE

The MSCP recommended minimum corridor width of 1,000 feet is exceeded along the entire length of Beeler Canyon when both City of Poway and City of San Diego open space lands are included. Corridors as narrow as 400 feet may be allowed for short distances (approximately 500 feet). The corridor between the existing homes in Beeler Canyon and these proposed on the Montecito project meet these criteria.

As noted in the EIR, wildlife movement through Beeler Canyon would be provided both to the north of the existing homes along the bottom of Beeler Canyon, along the adjacent slopes to the north, and through the 450-foot wide corridor along the lower southern slopes of Beeler Canyon. Wildlife would need to go around the existing Calmat Quarry operation under either scenario. The most likely scenario is that wildlife would choose the existing northern option given the topography and cover provided. Given the width of the corridor within Poway and the addition of the open space provided by the Project, it is anticipated that this corridor would continue to function effectively as a regional wildlife corridor.

The boundary adjustment would add to the existing MHPA area on-site. There would be an increase of edge perimeter because of the increase in the size of the MHPA. This potential increase in edge effects to the MHPA would be mitigated through the implementation of mitigation measures 4.3-14 through 4.3-18. Virtually all of this increase in linear edge would still result in viable open space areas based on City of San Diego Biology Guidelines (1999), which require that habitat areas be at least 400 feet wide for greater than a 500 foot distance and connected to viable open space to be considered viable open space.

A two-lane residential street (Street "B") that would connect the Sycamore Estates development to Beeler Canyon Road, as well as several utility access roads and detention basins that would be located within the Montecito and Sycamore Estates sub-project sites, would be built adjacent to the MHPA. Overall project design would maintain the integrity of the preserve design mapped in the Final MSCP, City of Poway MSCP, and the City of San Diego MSCP plans, thereby assuring continued wildlife movement in the region and avoiding significant impacts. In addition, the detention basins and utility access roads would not be lit at night. As riparian plant species develop in and around the detention basins, the basins may provide some benefit to wildlife movement by offering additional habitat for wildlife moving through the area.

LETTER OF COMMENT

RESPONSE

Rancho Encantada Precise Plan

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January 4, 2001

Wildlife Corridor adjacent to the Sycamore Estates project area. Figures 4.3-7 and Figure 4.3-8 show impacts in the central and northeastern portions of the Montecito and central portion of the Sycamore Estates project area within the City's established MHPA will potentially fragment and reduce the width of the established corridor restricting the movement of wildlife and stressing other established City and County wildlife corridors to the north and east of the Rancho Encantada project area. The addition of the MHPA land below the current boundary within the proposed Montecito Sub-Project area appears to be inadequate with respect to maintaining the Beeler Canyon Wildlife Corridor. The proposed MHPA areas shown on Figure 4.3-8 for the Sycamore Estates project area also appear to be inadequate since the proposed MHPA impact area in the central portion of the Sub-Project area may fragment connectivity to wildlife corridors east of the project site. The proposed MHPA areas within the Montecito and Sycamore Estates Sub-Project areas are not consistent with MSCP preserve design because the areas are not contiguous blocks of habitat, will create potentially significant "edge effects" and may not be conducive for the movement of wildlife. County staff recommends existing MHPA areas that are part of the City's MSCP be maintained and that if MHPA areas are proposed, that they consist of continuous blocks of habitat that do not create edge effects or fragmentation of wildlife corridors.

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2. 4.3-28 EIR: Indirect Impacts: Within the Project Wide Indirect Impacts analysis section, it is concluded that "edge effects" resulting from these proposed projects in the short and long term are minimized by the placement of fencing, shielded lighting, open space signage, detention basins and water quality filtration basins. However, it is not adequately shown that these measures proposed to reduce indirect impacts to the MHPA areas and the MSCP preserve areas supporting significant wildlife corridors will not be compromised since proposed fencing adjacent to development may restrict or deter the movement of wildlife between MHPA areas within and adjacent Montecito and Sycamore Estates Sub-Project areas. The result of these created "edge effects" could be similar to the discussed direct impacts in that the City's MSCP preserve system that has designated regional wildlife corridors could be compromised resulting in the increased usage and stress on other regional wildlife corridors within the project vicinity including potentially limiting connectivity to the County's Sycamore Canyon Wildlife Corridor. The Beeler Canyon Regional Wildlife Corridor could be significantly impacted as a result of the proposed Sub-Projects, reducing the wildlife corridor cumulatively impacting the wildlife corridor along with existing development and the Calmat Quarry to the north of the Sub-Project areas, primarily adjacent to Sycamore Estates Sub-Project area.

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3. The determination that the established MSCP preserve system will not be compromised by the development of Rancho Encantada is based on the assumption that both Montecito and Sycamore Estates Sub-Projects will be developed resulting in the addition of MHPA areas within both Sub-Project areas. However, in several sections of the EIR, 4.3-46-55, this assumption could potentially be violated with only Montecito or Sycamore Estates being developed, resulting in direct impacts to existing MHPA areas and only partial addition to MHPA areas. The proposed

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58. The fencing and lighting restrictions applied to the project are intended to mitigate edge effects to proposed MHPA open space and mapped regional wildlife movement corridors. Wildlife movement through the project site in a north-south direction is intended to be directed to the east of the Sycamore Estates sub-project, not through the proposed development. The overall corridor width along Beeler Canyon would be at least 400 feet wider for 74 percent of the length of the project, including all of the Sycamore Estates sub-project; utility access roads and detention basins would be located in this area, but would not deter wildlife movement. As noted in response number 57, potential increases in edge effects to the MHPA would be mitigated through the implementation of mitigation measures 4.3-14 through 4.3-18. Edge effects and impacts to wildlife movement have been fully addressed in the EIR.

59. If only one of the sub-projects moves forward, impacts to MHPA lands and wildlife movement would need to be fully mitigated by that sub-project as discussed in the EIR. If only the Sycamore Estates sub-project moves forward, there would be a net increase of 364.2 acres to the MHPA, and the wildlife corridor along Beeler Canyon would be widened by approximately 400 feet along most of its length. If only the Montecito sub-project moves forward, a boundary adjustment would be required to offset the encroachment into the MHPA on site. This could be accomplished by either enlarging the MHPA within the project site in a manner that would provide equal or greater functions and values to the MHPA consistent with City of San Diego Biology Guidelines (1999), or by enlarging the MHPA at an off-site location, possibly within the Sycamore Estates portion of the project. This boundary adjustment would need to be submitted to the City for their review. Concurrence from the CDFG and USFWS would also be required. Preservation of the MHPA if the Montecito sub-project is developed first would be assured by mitigation measure 4.3-20. Also see response number 57.

LETTER OF COMMENT

RESPONSE

Rancho Encantada Precise Plan

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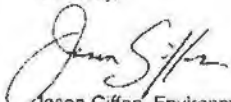
January 4, 2001

improving transit / bus services.

7. In addition to the tables that detail the intersections and roadway segments that are significantly impacted by the project, figures should be included. The figures should display maps for each scenario and highlight the significantly impacted roadway segments, intersections, and highway ramps.
8. It is stated on page 5 of the TIA, that Average Daily Traffic (ADT) volumes for existing conditions were assembled from SANDAG figures from 1994 to 1998. All volumes should be factored accordingly using a growth factor to properly estimate existing conditions (year 2000).
9. On page 82, a technique was outlined which was used to estimate peak hour turning movement volumes for the build-out with Project scenario. It should be stated that the technique is approved by the City of San Diego.
10. The TIA mentions that the Scripps Miramar Ranch community plan only allows for a two-lane arterial on Pomerado Road. It should be ensured that the modeling analysis for Pomerado Road assumed only one through lane for each direction and is consistent with the community plan.
11. The TIA states that the project includes 842 single-family homes while the Environmental Impact Report (EIR) states that there are 835. Consistency should be maintained between the TIA and the EIR.

The County of San Diego appreciates the opportunity to comment on the draft EIR. If you have any questions please contact Jason Giffen, Department of Planning and Land Use at (858) 694-3720 or Bob Goralka, Department of Public Works at (858) 694-3728.

Sincerely,



Jason Giffen, Environmental Management Specialist
Department of Planning and Land Use

cc: Gary Pryor, Director, Department of Planning and Land Use, M.S. 0650
Eric Gibson, Chief, Department of Planning and Land Use, M.S. 0650
John Peterson, CEQA Regulatory Manager, M.S. 0650
Bob Goralka, Route Location Manager, Department of Public Works, M.S. 0336
Dawn Dickman, Biologist, Department of Planning and Land Use, M.S. 0650
Brett Solomon, Biologist, Department of Planning and Land Use, M.S. 0650

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66 While these exhibits would graphically pinpoint the locations of the impacts, such exhibits are not required to be included in the study. The same data is provided in both a text and tabular format in Section 4.9 of the Traffic Technical Report and summarized in the EIR.

67 At the time that the Traffic Technical Report was initiated, the 1994-1998 data was the most current available for cities and the County. Because the analysis focuses on peak hour intersection capacity, the date of the Average Daily Traffic (ADT) counts is less pertinent to the findings of the analysis. Also, because future traffic growth at intersections was based on the difference between existing and Year 2020 ADTs on the legs, a higher assumption for the existing condition would result in a lower projection of Year 2020 peak hour turning movements. The approach taken in the Traffic Technical Report provides a worst-case analysis for the Year 2020 condition, which forms the basis of many of the project's mitigation measures.

68 The volume estimating technique used is a standard and customary technique used by traffic engineers to develop future traffic volumes.

69 The traffic model was validated by reviewing the key assumptions that SANDAG used. This included street classifications and capacity. The two-lane Pomerado Road segment was correctly coded.

70 At the time the Traffic Technical Report was initiated, a larger number of units were assumed than are proposed for the current project. The evaluation of 842 single-family units in the Traffic Technical Report therefore reflects a conservative assumption, because the analysis included seven more homes than what can actually be built.

CITY OF POWAY

MICKEY CANTAGNA Mayor
JAY GONFAY, Deputy Mayor
BOB EMERY, City Administrator
DAN HUGGINS, City Councilmember
PILLY KESTER, City Councilmember



January 19, 2001

Mr. Drew Kleis, Senior Planner
City of San Diego Planning and Development Review
1222 First Avenue, 5th Floor
San Diego, CA 92101

Subject: Rancho Encantada Precise Plan

Dear Mr. Kleis:

The Rancho Encantada Precise Plan combines two large residential subdivisions into a single development plan. The two projects proposed under the Precise Plan are Montecito and Sycamore Estates. Together these projects propose the construction of approximately 1,000 new residential dwelling units over 2,658 acres. The area encompassed by the project directly borders the City of Poway to the south. As a neighboring residential development, future residents within Montecito and Sycamore Estates subdivisions will partially or wholly rely on existing roadways, educational, safety, library, and park services provided by the City of Poway. In light of the potential impact on Poway City services and roadways, the City of Poway's Development Services Department has reviewed the draft Rancho Encantada Environmental Impact Report and offers the following comments:

71A

Significant Report Inadequacies

False Assumptions

- The Countywide regional growth models do not anticipate any development in this area. Over 1.2 million new residents are projected within San Diego County by the year 2020. The people and impacts associated with Rancho Encantada are an addition to all present growth assumptions and impacts. The draft EIR falsely assumes that design and implementation strategies of regional agencies can accommodate this level of growth, in this location, at this time. These regional agencies include the Metropolitan Water and Sewer Districts, San Diego Gas & Electric, Caltrans, MTDB, APCD, and SANDAG. This project should not be allowed to move forward until the impacted regional agencies acknowledge the impacts and make the necessary findings indicating their ability to accommodate the growth and mitigate the cumulative impacts to the regional environment.

71B

City Hall Located at 13325 Civic Center Drive
Mailing Address: P.O. Box 789, Poway, California 92074-0789 • (858) 748-6600, 695-1400
FAX 748-1455

71A

The proposed project would not rely on City of Poway services. As disclosed in EIR Section 4.11, the project would be serviced by the City of San Diego Fire Department, City of San Diego Police Department, City of San Diego library system and the Poway Unified School District which services Poway, Rancho Bernardo, Rancho Penasquitos, Sabre Springs, and Carmel Mountain Ranch. A public park is proposed on the site which would be conveyed to the City of San Diego and which would reduce the project's public park impacts to a less than significant level. Public facilities (roads, parks, libraries, etc.) including facilities in the City of San Diego and the City of Poway are available to all members of the public, regardless of their place of residence.

71B

Absent an approved development plan, regional growth assumptions are based on existing zoning (see EIR Section 2.4.2). As noted by the EIR's No Project-Existing Zoning Alternative, development of the proposed project site in accordance with its underlying zoning could result in a much greater development intensity than that proposed by the project. Based on existing zoning, up to 278 residential units could occur on the Montecito sub-project site and up to 178 residential units and large areas of industrial use could occur on the Sycamore Estates sub-project site. No "findings" need to be made by the regional agencies noted in this comment for the EIR to be certified and for the proposed project to be approved. The traffic model developed for the project incorporates input from the City of Poway for uses within the City of Poway. These assumptions were defined in detail through a series of correspondence between the City of Poway and the City of San Diego. Notwithstanding the above, adequate public services are available to service the proposed project as discussed in Section 4.11, PUBLIC SERVICES, of the final EIR.

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Traffic Impacts Understated and Unmitigated

- The proposed development is projected to generate 10,548 vehicle trips per day. According to the EIR, traffic impacts on Pomerado Road are unmitigatable. Suggested project mitigation measures require major modifications to all adjoining roadways, and intersections extending out Interstate 15 that may not be physically possible based on the existing built environment. Major flaws in the methods of traffic analysis invalidate the traffic study. The deficiencies include using incorrect Levels of Service, inaccurate roadway configurations, and the use of a model that automatically adjusts volume/capacity ratios based on theoretical ideal conditions, which are unrealistic, thereby artificially underestimating future Levels of Services. The traffic report remains inconclusive, inadequate and does not meet the guidelines of the California Environmental Quality Act. Further details are discussed in the traffic section of this letter.

72

BIOLOGY:

- The Poway Subarea Habitat Conservation Plan designates the Beeler Canyon/Creek Road area as an important regional and local wildlife corridor. This corridor not only extends east/west along the canyon, but south through the eastern portion of this project. Although Beeler Canyon Road and Creek Road follow along this corridor system, they are used by a very limited amount of local traffic only. The introduction of this secondary access route from Rancho Encantada Parkway, with direct access to Beeler Canyon Road, will significantly increase traffic volumes on the roadway. The proposed increase in traffic volume could significantly impact the viability of the corridor system. The concept that wildlife will only move to the north or south of the creek is an unacceptable mitigation measure.
- The Arroyo southwestern toad is listed as endangered species by both the U.S. Fish and Wildlife Service and the Department of Fish and Game. The biological survey failed to include this species in its report.
- The text on page 4.3-51 of the biological analysis report indicates that there were no covered species found in area removed from the MHPA or observed in field surveys, yet there is a gnatcatcher sighting shown in Figure 4.3-6 within the proposed development portion of the Montecito project and no discussion of mitigation.

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72 The traffic analysis was conducted in accordance with the procedures established by the reviewing agency and was based on commonly used and accepted assumptions. The following steps were used during the course of the analysis.

- The project's daily and peak hour traffic generation was calculated using standard City of San Diego rates. Internal capture for traffic generated by uses that would be expected to serve the project's residential component [i.e., the park, institutional use (house of worship), and elementary school] was estimated based on reasonable assumptions approved by City of San Diego Transportation Development staff.
- A travel demand model was developed to forecast Buildout (Year 2020) traffic volumes. This model incorporated many land use and network refinements that are not typically included in travel demand forecasts for proposed developments. These refinements include "windshield surveys" to confirm street design, capacity and traffic control; coding of land uses for cumulative projects known at the time of the modeling; and incorporation of land use and network revisions requested by City of Poway staff. Whereas the standard practice would be to run the existing San Diego Association of Governments (SANDAG) Series 9 model without modification, the modeling effort undertaken for this project provided a much higher degree of refinement and specificity than the unmodified SANDAG model. The incremental assignment of traffic based on v/c ratios on alternative routes, referred to as the "capacity constraint" assignment was applied and is the regional standard of practice for traffic modeling in the region established by SANDAG.
- Traffic model output was reviewed to identify results that may not be considered reasonable based on local knowledge and experience. Manual adjustments were made in situations where the model traffic assignments appeared inexplicable. These adjustments were confirmed with City staff and are documented in detail in Appendix C of the Traffic Technical Report.

LETTER OF COMMENT

RESPONSE

- The study area was specified using the standard procedures summarized in the City of San Diego's *Traffic Impact Study Manual* and the regional implementation of the Congestion Management Program (CMP). Peak hour intersection turning counts were conducted by professional data collectors and summarized. Existing Average Daily Traffic volumes were obtained from SANDAG's compilation of regional daily traffic counts, *San Diego Region Average Weekday Traffic Volumes*. Ramp meter rates and existing and future freeway ADTs were obtained from Caltrans District 11 staff.
- A reasonable cumulative background traffic growth factor was used to estimate the background traffic growth anticipated to be on the surrounding street network and intersections at the time project construction would be completed and project land uses would be occupied.
- Projected traffic scenarios were defined based on the requirements of the City's *Traffic Impact Study Manual*. In addition to the minimum required scenarios (i.e., Existing, Existing plus Cumulative, Existing plus Cumulative plus Project, Buildout without Project and Buildout with Project), the traffic study also evaluated Opening Day with Initial Project Development and Buildout with Project plus Military Family Housing (the latter scenario assumes the U.S. Navy Southwest Division would select a military housing site that loads to Pomerado Road, south of Rancho Encantada Parkway).
- Analysis of existing, near term and long term future traffic conditions was conducted in accordance with the procedures specified in the *Traffic Impact Study Manual*, and Caltrans procedures were used to evaluate freeway main lanes. Project traffic impacts were identified using the thresholds specified in the *Traffic Impact Study Manual* and transportation improvements were identified to mitigate the project's traffic impacts where feasible.

Please refer to response numbers 77 through 99 for more detailed responses to traffic related comments.

- 73 The traffic volume on Beeler Canyon Road without the proposed project is 200 ADT. The proposed project's traffic model shows that an additional 211 ADT would be added to Beeler Canyon Road as a result of project buildout, for a total of 411 ADT. In order to analyze a worst-case scenario, a sensitivity analysis was conducted and it was found that the potential exists for 411 to 950 ADT to use Beeler Canyon Road in the future. While the number of trips would be increased by the project, an increase to between 411 to 950 ADT would not significantly reduce the function of the wildlife corridor through Beeler Canyon because 411 to 950 ADT's still represents a limited number of cars using Beeler Canyon Road.
- 74 The Biology Reports (Appendices B1 and B2 of the EIR) rate the arroyo toad (*Bufo californicus*) as having a low potential to occur because the habitat is inappropriate. This species requires shallow pools and open sand and gravel flood terraces of medium- to large-sized intermittent or perennial streams that are flooded on a fairly regular basis. This species can also breed in smaller streams, deep canyons, and utilize upland habitats as juveniles, subadults, and adults (USFWS 1999). Beeler Canyon on-site is too dry to support this species.
- 75 Figure 4.3-8 represents the Sycamore Estates sub-project site, not the Montecito sub-project site. No gnatcatchers have been observed on the Montecito project site (EIR Figure 4.3-7). One gnatcatcher was observed in an area immediately adjacent to an area being added to the MHPA on the Sycamore Estates project (Figure 4.3-8). Mitigation is included (see mitigation measure 4.3-19).

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WATER QUALITY

Information pertaining to water quality, storm drain runoff, and potential residential runoff into Beeler Creek is inadequate. The report fails to recognize that all the residential properties located along Beeler Creek Road rely on well water. The proposed mitigation measures utilize siltation basins to capture drainage water, which would let the water and pollutants percolate through the basin before running into Beeler Creek. The report fails to discuss the potential impact on the quality of the ground water upon which the Beeler Canyon residents rely for drinking water. The report also fails to discuss the size, holding capacity, and maintenance responsible of the detention basins, nor provide mitigation measures to address or prevent the overflow or breach of a basin during a large storm event and who is responsible for damage to the properties along Beeler Creek Road

75A

Based on the increased amount of non-porous surfaces created with new roads, homes and hard surfaces, the new development will increase the amount of, and degrade the quality of, runoff flowing into Beeler Creek. While the Draft EIR does propose several detention basins, it does not appear sufficient to capture and filter the runoff originating from residential nodes

75B

SURROUNDING BUILT ENVIRONMENT

The description is not accurate. The report indicates that there are several single-family lots of one to four acres in size located along Beeler Canyon. There are 12 single-family homes along Beeler Creek, including a 60-acre horse ranch.

75C

MSCP

The report lists types of land uses considered compatible with the objectives of the MSCP. Park use is not listed as a compatible land use, yet the proposed MSCP open space area is already being considered as Mission Trails Regional Park North. The impact of man and animal into this area is inconsistent with the goals of the MSCP

75D

Figure 2-9 proposes two types of habitat conservation land uses, C-27 and C-28. If the goal is to preserve the habitat, why not make the entire area C-27? Permitting alternative land uses within 25% of the C-28 zone creates a potentially significant impact on the viability/integrity of the open space preserve.

75E

75A The project proposes a variety of permanent water quality measures as required by federal, state and local Clean Water Act regulations and permits. Project approval would be conditional upon compliance with these legal and permit requirements. The permanent water quality measures would address protection of both surface water and groundwater resources. Therefore, the EIR adequately addresses impacts to groundwater resources.

The project would be required to protect water resources to a standard known as the Maximum Extent Practicable (MEP). The specific permanent water quality measures would be designed, in terms of size, capacity, effectiveness, maintenance, etc. to meet the MEP standard. Permanent water quality measures are typically designed to protect receiving water quality by treating dry weather flows and the dominant pollutant-carrying portion of wet weather flows. Permanent water quality measures can protect water resources to MEP standards by addressing these smaller flows separately from large storm event flows. The large storm event flows would be handled separately by the project's storm water conveyance systems that include detention/retention basins.

75B Approval of the project would be conditional upon compliance with federal, state and local Clean Water Act and storm drainage regulations and permits. Storm water conveyance systems, including detention/retention basins and permanent water quality measures would be designed, in terms of size, capacity, effectiveness, maintenance, etc., to meet the standards required by the regulations and permits. The measures shown and described in EIR Section 4.5, HYDROLOGY/WATER QUALITY, have been preliminarily designed to those standards.

75C The surrounding land use description in EIR Section 2.2.1 has been expanded to disclose the existence of the 60-acre horse ranch and to clarify that the number of existing single-family homes along Beeler Canyon Road is twelve.

75D The MSCP open space area on Rancho Encantada, referred to as Mission Trails Regional Park North, would be a passive recreation use area which is a compatible land use under the MSCP. Providing access to natural preserve areas for passive recreation is also a specific objective of the MSCP.

75E MSCP Guidelines C-27 and C-28 refer to adopted MHPA guidelines included in the City of San Diego MSCP Subarea Plan, and are not "zones." Development within the City of San Diego is required to be in compliance

LETTER OF COMMENT

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- The project is not consistent with the MSCP guidelines. MSCP guidelines preclude drainage waters from parking lots and developed areas from draining directly into the MHPA. Although they may not drain directly into the proposed project MHPA areas, there are situations where they flow directly into Beeler Creek, which is located within the City of Poway MSCP/HCP.

76

TRAFFIC

In a letter dated March 24, 2000, Mr. Sivash Pazargadi of the City of San Diego suggested that the Traffic Model used for determining impacts of the Rancho Encantada Development was not a final version of the Series 9 analysis. It is important to identify in detail what changes to the regional model were made to produce results for this report. This comment is made due to observed discrepancies in traffic volumes reported in the analysis, compared to those shown on the 2020 forecast.

77

Pomerado Road, in Scripps Ranch, has existing volumes that exceed roadway capacity. Several years ago, San Diego, downsized Pomerado to a two-lane collector through a General Plan Circulation Element amendment. With the downsizing, it was foreseen that planned growth would worsen conditions. The Rancho Encantada project was not anticipated in those General Plan Circulation Element changes and will exacerbate problems significantly beyond those foreseen in the General Plan change. Traffic impacts in Poway associated with this development will be significantly worse than would have been expected had Pomerado Road been constructed to the previously planned four-lane configuration.

78

Volumes reported on Figure and Table 2.1-1, pages 6 and 7, are from 1999 and should not be considered as existing volumes. Traffic has increased significantly on Pomerado between Treadwell and Scripps Poway Parkway, and on Scripps Poway Parkway between Community Road and Springbrook Drive, as a result of opening two sizeable commercial projects (Trident Center and Discovery Isle) in late 1999.

79

Existing segment LOS's reported on Table 2.1-1 are not accurate. The table uses v/c ratios based on ideal roadway capacity. Imposition of arterial friction such as traffic signals, driveways, median openings, etc., lowers arterial capacity and therefore degrades LOS below ideal conditions. A traffic impact analysis for a project of this magnitude should report conditions as accurately as possible. To more accurately identify these conditions, the Arterial Analysis module of the Highway Capacity Software should be used instead of v/c comparisons. HCS Arterial Analysis will identify additional segments to report with a LOS worse than D (and should be reported on p. 5).

80

RESPONSE

76 The comment incorrectly states that drainage from parking lots and developed areas would drain directly into Beeler Creek. All drainage from parking lots and developed areas, by project design, would be treated prior to draining into Beeler Creek. EIR Figure 4.5-5, Proposed Structural BMPs, indicates the locations of structural BMPs. Structural BMPs also are shown on the proposed Montecito VTM and Sycamore Estates VTM. Mitigation measure 4.5-2 discusses maintenance of permanent BMPs for both the Sycamore Estates and Montecito sub-project sites.

77 The March 24, 2000 letter from Siavash Pazargadi of the City of San Diego to Jim Lyon of the City of Poway indicated that some jurisdictions had questioned the smart growth assumptions in the Series 9 model and, pending further evaluation and discussions, the smart growth assumptions might be modified in the future. However, at the time of the analysis, the Series 9 model, including the smart growth assumptions, was the regionally-accepted planning tool. Further, the model refinement and incorporation of City of Poway land use inputs tailored the Series 9 model for specific use for the proposed project. See response number 86 for further discussion of this topic.

78 The traffic analysis has correctly assumed the adopted street classification for Pomerado Road and other streets in the traffic study area. The propose of the Traffic Technical Report is to study the impacts of project traffic on the adopted transportation system, including certain Poway streets. This analysis has been properly conducted.

79 A five percent growth factor was applied to these volumes to reflect additional traffic generated by new development proposals in the study area.

80 ADT-based LOS is prescribed for all traffic studies in the City of San Diego by the *Traffic Impact Study Manual* (1998). However, the intersection, freeway, ramp meter, and CMP arterial analysis all focused on capacity during the peak commuting hours.

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Existing intersection peak hour LOS's reported on Table 2.2-1 are inaccurate. City staff, through comparison with other recent counts, identified numerous intersection turning movement counts with reported volumes lower than actual conditions. Lower volumes usually result in better LOS. Further, intersection LOS calculations were apparently made by allowing the software to select an optimum cycle length. This usually results in significantly better than actual LOS. In reality, during peak hours, signals in Poway are coordinated and require cycle lengths significantly longer than those reported. All intersections in the study with cycle lengths shorter than or equal to 90 seconds, should be recalculated using a more realistic time. This should be included in corrections along with corrected LOS data.

81

Table 2.3-1 summarizes existing arterial segment conditions. The table fails to include Scripps Poway Parkway east of Pomerado Road. This should be included for comparison purposes with future conditions. Additionally, the table shows Pomerado Road in only two segments. The long segment between Treadwell and Ted Williams Parkway should be divided in two at Poway Road. Pomerado Road changes significantly in character at Poway Road with commercial properties, high density residential and two schools north of Poway Road. It is expected that LOS calculations of the two will confirm the significant difference with a lower LOS seen north of Poway Road. Failure to complete this split will result in inaccurate reporting of LOS on Pomerado north of Poway Road.

82

In Section III, Methodology for the Projection of Future Traffic, the study assumed that traffic at the Beeler Canyon access would be nominal, and later in the report estimates that 3% of project traffic will use Creek Road. The study does not include how such a low percentage will be maintained. The project street layout suggests that Creek Road has the potential for being a primary access point for a much higher percentage of the project traffic. Such an access point would be particularly attractive considering the LOS F condition that exists on Pomerado Road at Rancho Encantada Parkway. Proactive steps should be implemented to prevent a higher percentage of project traffic from using Creek Road. Only a 5% underestimation in the project traffic trip distribution will result in the majority of traffic being added to Poway streets. This should be noted in view of the conservative percentage of project traffic allocated to Creek Road.

83

Following comments relative to the manual adjustments:

Adjustment 1
 No comments.

81 The analysis contained in the Traffic Technical Report was conducted in accordance with the guidelines published in the City of San Diego's *Traffic Impact Study Manual* (1998). This approach is commonly utilized and accepted as an appropriate analysis under CEQA to evaluate the project's impacts.

82 See response number 81.

83 See response number 98 which addresses alternative assumptions for project traffic assignment on Beeler Canyon Road/Creek Road.

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Adjustment 2

Manual adjustment of volumes on Scripps Poway Parkway west of Pomerado, as noted in Appendix C, has reduced the volume below that shown just east of Pomerado. It is reasonable to expect that volumes will continue to increase to the west, past Pomerado, and it is suggested that the 50,600 AWD originally shown is more accurate than the adjusted volume. The SANDAG 2020 forecast shows 51,000 AWD in this segment without the project.

84

Adjustment 3

Background shift (volume reduction) on Stowe and Kirkham don't appear necessary. The SANDAG 2020 forecast projects a volume of 14,000 on Stowe and 25,000 AWD on Kirkham without the project. Project volumes may be somewhat high, however. The projected volume on Scripps Poway Parkway, between Community and Kirkham, is very low (41,600 AWD) compared to the SANDAG model (46,000 AWD without project) and should be increased significantly.

85

Section III, Build-out Traffic Conditions, indicated build-out volumes are taken from the San Diego Year 2020 model with Poway inputs. As noted above, volumes are lower using this model than those shown on the SANDAG 2020 forecast. Please detail differences in the two models that cause the volume discrepancy and discuss why it is acceptable to choose the lower volume (less conservative) option.

86

Section III Build-out Traffic Conditions, also states that "without project" volumes were estimated by subtracting project ADTs from the model plot. Why weren't the SANDAG 2020 forecast volumes used to report, without project volumes, since the model does not include Rancho Encantada?

87

In comparing figures 3.4-1 and 3.4-3 build-out with and without project, volumes are shown to increase by approximately 2000 ADT on Pomerado north of Scripps Poway Parkway, but only by 500 ADT on Pomerado north of Stowe. This suggests 1,500 vehicles will use Stowe. It is more reasonable to assume 1,500 will use Pomerado and 500 will use Stowe.

88

Section IV Traffic Impact Analysis Impact Significance Criteria indicates general LOS thresholds were used to assign LOS values to arterials studied. The Roadway Classifications, Levels of Service (LOS) and Average Daily Traffic chart, in Appendix A, that was used to assign LOS contains a note that LOS values are only intended as a general planning guideline. The chart provides rule of thumb estimates and does not consider arterial specifics such as intersections, traffic signals side friction and land use that degrades capacity and therefore lowers LOS. The traffic impact analysis for the

89

84 The re-assignments attached to the memo in Appendix C were sketched onto a copy of the initial traffic model run, which did not incorporate City of Poway land use inputs and other refinements made by the City of San Diego. The traffic analysis was based on the refined traffic model run (May, 2000). The Buildout with Project with Military Family Housing scenario estimates approximately 53,100 on Scripps Poway Parkway west of Pomerado Road and 57,400 ADT east of Pomerado Road (see Figure 3.5-4 on page 97 of the Traffic Technical Report).

85 The intent of this adjustment was to ensure that the project's impacts on a more congested intersection (i.e., Scripps Poway Parkway/Community Road) would not be understated as a consequence of what appeared to be an unrealistic level of diversion around this location. While the adjustment involves a relatively small volume of traffic, it makes sure that the project's potential impact on a congested intersection is accounted for in a conservative way. As noted in response number 84, the volumes on the diversion sketch in Appendix C are out of date. Figure 3.5-4 of the Traffic Technical Report shows the volume on Scripps Poway Parkway between Community Road and Kirkham Way to be 50,600, which is higher than the corresponding SANDAG Series 9 forecasted ADT.

86 The refined traffic model incorporating both City of Poway and City of San Diego enhancements is both better tailored to the study area and more detailed compared to the Series 9 Cities/County forecast. Review of selected locations indicate that the volumes evaluated in the study are consistent with and higher than those in the 2020 Cities/County forecast, as published in the Thomas Guide format by SANDAG (April 10, 2000). The Rancho Encantada volumes were taken from Figure 3.4-5 of the Traffic Technical Report:

	Rancho Encantada Model Run	SANDAG
Pomerado Road, north of Poway Road	29,918	25,000
Pomerado Road, south of Poway Road	22,862	21,000
Community Road, south of Poway Road	39,300	36,000
Community Road, north of Scripps Poway Parkway	24,800	21,000
Scripps Poway Parkway, west of Community Road	50,600	51,000

(The above locations were selected because they are key facilities in the City of Poway. It is acknowledged that there may be cases where the Rancho Encantada traffic model runs may be lower than the corresponding SANDAG volumes.)

LETTER OF COMMENT

RESPONSE

- 87 Because the project and Military Family Housing land uses were coded into the traffic model, it was appropriate to estimate a without-project condition by subtracting out the volumes from the forecast numbers. For the reasons discussed in response number 86 and because the model incorporated numerous refinements from the Cities of Poway and San Diego, it was determined that the project-specific model was more appropriate than the more generic SANDAG model, upon which it is based.
- 88 Figure 3.2-4 of the Traffic Technical Report shows the project traffic assignment. While this figure does not show the project volume on Stowe Drive, it does show approximately 1,900 ADT on Pomerado Road south of Stowe Drive and 1,600 north of Stowe Drive. Approximately 300 vpd are siphoned off of Pomerado Road to Stowe Drive.
- 89 See response number 80. Peak hour arterial analysis was conducted on Regionally Significant Arterials (RSAs) in the study area in accordance with the Countywide implementation of the CMP.

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Rancho Encantada development is a detailed analysis containing data such as turn movement counts, segment volumes, distance between intersections and signal timing that allows for more accurate identification of arterial LOS using Highway Capacity Software. A housing development the size of Rancho Encantada merits use of the Highway Capacity Software for more accurate reporting of arterial LOS on all arterials studied.

89

Table 4.3-3 summarizes Arterial Capacity Analysis of Scripps Poway Parkway and Pomerado Road. The analysis uses intersection signal timing assumptions (particularly unrealistically short cycle lengths) that are incorrect. These assumptions can artificially improve the reported LOS. Further, the segment of Pomerado Road between Treadwell and Ted Williams Parkway should have been broken into two segments for accurate LOS calculation. The segment should be broken at Poway Road as arterial characteristics change there.

90

LOS and delays reported on Table 4.4-2, and others throughout the document, will change with corrected intersection volumes and signal timing. Table 4.9-2, listing the evaluation of significance of traffic impacts, will need to be adjusted as well.

91

Section V, Transportation Improvements indicates "improvements that would restore LOS on Pomerado in San Diego are not consistent with the Community Plan" and are therefore not feasible. It should be noted that, by not constructing those improvements, traffic impacts on Poway arterial streets are more severe. For this reason, consideration should be given to amending the San Diego Community Plan to accommodate more of the anticipated traffic impacts.

92

Several sections in the Traffic Impact report suggest the City of Poway intends to change land use in the Industrial Park from Industrial to Office. At present, the City does not intend to make this change. As it is not germane to the Rancho Encantada development, it is recommended that all references to this change be removed from the report.

93

In Section V, Other Transportation Improvements, additional traffic signals are recommended at three locations on Spring Canyon Road in anticipation of traffic diversion from Pomerado Road. It seems more reasonable that the additional signals on Spring Canyon will help repel this diversion, and possibly force a higher percentage of traffic north into Poway. Further, the suggestion to construct medians at selected intersections, to discourage cut-through traffic, will reduce accessibility and therefore inconvenience the community the medians are intended to serve.

94

Section V also suggests construction of a traffic signal at Pomerado Road and Stonemill Drive due to the "significant traffic impact" of the project at build-out. The report suggests

95

RESPONSE

90 See response number 82.

91 See response number 81

92 The decision to classify Pomerado Road as a two-lane collector street was made many years before the Rancho Encantada project was proposed. The issue of widening Pomerado Road was broached with the Scripps Ranch Community Planning Group as one of the first meetings the project applicant held with the group. The Planning Group clearly indicated that they would not support the option of widening Pomerado Road. As a result, all traffic studies have respected the adopted street classification of Pomerado Road.

93 This comment was based on a series of correspondence between Miriam Kirshner of the City of San Diego and Kim Lyon of the City of Poway. Poway staff confirmed that office/ industrial uses in TAZs 1561 and 1578 could potentially be shifted to office uses and indicated that the model "should anticipate such growth."

94 The Traffic Technical Report does recommend that the applicant work with the community to implement improvements to Spring Canyon Road that achieve the objectives of both facilitating through traffic on Spring Canyon Road and limiting cut-through traffic on residential streets.

95 The project applicant will work with the City of Poway to best determine how to implement this measure. It is acknowledged that the City of Poway has control over how this improvement is implemented, or if it is needed.

Rancho Encantada Draft DIR - Comment Letter
 January 19, 2001
 Page 8

that flow through this segment will be otherwise acceptable. Because this segment is primarily a two-lane road, LOS will be E or worse with project traffic added in. A traffic signal could have been installed when the Rolling Hills Estates subdivision in Poway was built. This option was not implemented because of the unusual intersection approach geometry (roadway curvature and grade). The report indicates left turns in and out are not allowed during the peak morning period. Only left turns out are restricted. A traffic signal with a phase allowing left turns out of Stonemill will accommodate left turns out, but will reduce capacity on Pomerado and, therefore, further reduce LOS on this segment.

95

Section VII Summary of Findings - Opening Day Conditions indicates only 2% background traffic growth was added to Pomerado Road, due to its constrained condition, while 5% was added to other arterials. Pomerado Road, from Creek Road north, does not have the same constraint as the southern segments and should have the full 5% background traffic growth added.

96

Section VII Project Traffic Impacts and Mitigation lists will require updating with corrections noted above.

Suggested mitigation, at the intersection of Scripps Poway Parkway and Pomerado Road, includes construction of additional left turn pockets in the northbound and westbound directions. The suggestion is schematic only. Because the intersection is already built out and existing geometry is highly constrained by buildings, topography, and sensitive open space, it is recommended that additional review be completed to help ensure that the improvements are indeed possible and, if done, what cost will be incurred.

97

- The traffic report indicates that traffic volumes on Creek Road and Beeler Canyon Road, utilized as a secondary access road, are anticipated to increase by only several hundred trips per day. This figure is highly suspect because: (1) it is uncertain if the proposed elementary school will have a bus system; (2) it is uncertain what phase of residential development the school will be constructed; and, (3) the use of this route will proportionally increase as the intersection of Pomerado Road and Rancho Encantada Parkway progressively deteriorates to LOS D, E or F. The existing analysis should be redone to evaluate these scenarios, as well as, the potential impact that closing Creek Road would have with respect to these issues.

98

- MCAS-Miramar has selected an area immediately south of Rancho Encantada as a possible location for up to 1,000 military housing units. The EIR fails to fully evaluate potential design alternatives that would coordinate access to Interstate 15, SR-52, Miramar Way and Pomerado Road via shared roads and intersections.

99

96 The constrained two percent growth factor was assumed for Pomerado Road from I-15 to Metate Lane. North of Metate Lane, the full five percent growth was assumed.

97 A preliminary geometric plan has been completed that confirms that the mitigation can be completed within the existing roadway improvements.

98 Appendix K of the Traffic Technical Report looks at two "what if" scenarios related to Beeler Canyon Road/Creek Road access. The first option involved the closure of Beeler Canyon Road, and the second evaluated the potential for increasing the project assignment to 411. Analysis of intersections impacted by both scenarios indicated that neither the closure nor the additional assignment would have a significant impact. A sensitivity analysis for 950 ADT also was conducted for Beeler Canyon Road, and no significant impacts were identified (see response number 73).

99 At the time the Traffic Technical Report was initiated, the location of the Military Family Housing (MFH) development was not fixed; various alternative locations were being evaluated. The project's access had to be established independently of the MFH project. At project definition meetings in January, 2000, MCAS representatives indicated that they would not approve of public roadways traversing the MCAS Miramar base. As a result, the project's access opportunity is limited to Pomerado Road, since a connection to the north is not feasible.

LETTER OF COMMENT

Rancho Encantada Draft DIR - Comment Letter
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Page 9

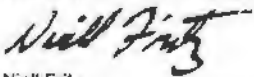
PUBLIC SERVICES:

100 A sewer pump station is proposed near the intersection of Beeler Canyon Road and Creek Road. This single station would serve the entire 1,000 units. If the pump station were to fail, the subsequent spill would create a devastating impact on the residents, water quality, plant and animal communities that depend on, and live in, Beeler Creek. Design methods to address and prevent this potential problem should be included in the EIR.

101 Although the Plan speaks to utilizing low-water-using plant material and the reduction of large turf areas, the use of water in common areas, slopes and individual lots will still remain high. With the increasing scarcity and cost of water and the need to minimize the region-wide demand on potable water systems, the EIR should evaluate the cost benefits of dual-plumbing the project with potable and reclaimed water lines.

102 As noted in the comments, numerous sections of the Draft EIR are significantly deficient in their analysis. Consideration should be given to recirculate a revised EIR in order to allow the public and affected agencies an opportunity to review and comment on the true impacts of the project and to consider necessary additional mitigation measures.

Thank you for the opportunity to review and comment on the Rancho Encantada Draft Environmental Impact Report.

Sincerely,

Niall Fritz
Director of Development Services

c: James L. Bowersox, City Manager

N:\CITY PLANNING\LETTERDIR-EIR.DOC

RESPONSE

100 The EIR evaluates two alternate sewer strategies, a sewer lift station and a gravity sewer line. Although it is a generally accepted sewer design principal that lift stations should only be used when gravity solutions are not available, the sewer lift station strategy has been included in the environmental analysis in the event that the City of Poway would not approve a gravity sewer system running through a portion of Poway's city limits. Selection of the gravity sewer strategy would prevent this potential concern.

If the lift station strategy is selected, the lift station would be designed to the standards of the Metropolitan Waste Water District and the City of San Diego. These standards require that the design address potential failure scenarios. The EIR has been revised in Section 3.2.8, Conceptual Water, Sewer and Drainage Plans, to indicate that the lift station, if selected, would be designed to the standards of the Metropolitan Waste Water District and the City of San Diego.

101 The project considered the use of reclaimed water. The consultant for the supplying agency analyzed the potential for use, comparing the amount of irrigated landscape suitable for reclaimed water with the costs associated with bringing it to the site. The consultant concluded, based on that analysis, that the use of reclaimed water is not financially feasible at the Rancho Encantada project site. The analysis regarding the use of reclaimed water on the project site is included as part of the Administrative Record and is available for review at the offices of the City of San Diego Land Development Review Division.

102 Pursuant to State CEQA Guidelines, a lead agency is required to recirculate an EIR when significant new information is added to the EIR. New information added to an EIR is not "significant" unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect that the project proponents have declined to implement.

Recirculation is not required where new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR. Because no new significant adverse impacts or significantly increased impacts have been identified, recirculation of the EIR is not warranted.

LETTER OF COMMENT

RESPONSE

01/05/2001 22:05 5192991742 6192991742 SIERRA CLUB PAGE 81



SIERRA CLUB, SAN DIEGO CHAPTER
San Diego and Imperial Counties
3520 Ray Street
San Diego, CA 92104-3823

Office (619) 299-1743
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January 5, 2001

Lawrence C. Monserrate
Environmental Review Manager
Planning and Development Review Department
1222 First Avenue Fifth Floor
San Diego, CA 92101

Faxed to: 619.446.5499

RE: Draft Environmental Impact Report Rancho Encantada Precise Plan
LDR No. 99-1094/SC(2000)11053

Dear Mr. Monserrate,

Thank you for the opportunity to comment on the Draft EIR for the Rancho Encantada Precise Plan. The development of this parcel in accordance with Council Policy 600-29, which allows clustering of dwelling units to provide for more open space conservation, is in accord with Sierra Club goals to maximize conservation of the valuable habitat remaining in San Diego. However, certain aspects of the proposed project, which do not meet the standards set by the city's Resource Protection Ordinance (RPO), the environmental guide under which the developers of this project have chosen to work, can be improved by following the environmentally preferred alternative, the Reduced Project Alternative. This alternative would also be most consistent with the conservation goals of the Sierra Club.

103

The EIR itself is an inadequate document in that it does not address the issue of public transit as a means to provide alternative transportation to the residents of the project. Traffic is a critical issue at this time in the growth of San Diego City and the adjoining areas. Population growth has brought the area to a point where fast, effective, public transit can be a viable option for transportation. It is time that our planners and developers recognized this as an environmental issue that needs to be fully discussed in the EIR.

104

LANDFORM/VISUAL QUALITY

The change of land use from relatively vacant land to that of a residential neighborhood is regarded as a significant and unmitigated visual quality impact (page 4.1-17). Only adoption of the Reduced Grading, Reduced Project, or RPO Consistent Alternative would partially reduce the direct and cumulative visual quality impacts of the proposed Project (page 4.2-29). Under the city's standards, landform alteration impacts are considered significant when grading quantities exceed 2000 cubic yards per graded acre and the creation of manufactured slopes over 10 feet in height (page 9-23). Although the RPO Consistent Alternative does meet the city's standard for grading and the Reduced Project Alternative does not meet this standard, the

105

103

Comments regarding the Sierra Club's preference for the Reduced Project Alternative, as the environmentally preferred alternative, are noted.

104

Public transit service is not currently offered to the project site vicinity by the Metropolitan Transportation Development Board (MTDB) and provision of such service is not within the control of the applicant and is beyond the scope of the project. However, the applicant's consultant submitted a written request for service to MTDB in January 2001. MTDB responded on February 14, 2001, stating that limitations in transit service operating funds have prevented MTDB from developing new service plans for the area, but that service expansion may occur in the future.

105

These comments are noted.

Reduced Project Alternative has a reduced impact on the total area in that it proposes to grade only a total of 400.7 acres compared to the grading total in the RPO Consistent Alternative of 551.3 acres and 743 acres on the proposed project. This large reduction of impact to land of 342.3 acres from the proposed project will greatly improve the visual qualities of the parcel as well as provide greater protection for biological resources and wetlands.

105

TRAFFIC/CIRCULATION

The direct and cumulative traffic impacts on Pomerado Road would be inconsistent with the Transportation Element of the Progress Guide and General Plan resulting in a significant impact (page 4.1-13) which is unmitigable. The Reduced Project Alternative has a reduced impact on traffic due both to the reduced number of dwelling units provided, 758 compared to 940, but also the number of predicted daily trips per unit in the Montecito sub-project is lower because the units are attached rather than detached single family homes.

106

Neither the proposed project nor any of the alternatives address the issues of public transit. The traffic conditions on Pomerado Road and its intersections are already at a low LOS and the addition of further traffic generated by any new housing will only reduce the LOS. The developers are required to provide a number of street and highway improvements before they can begin construction in order to mitigate the traffic impacts of the new development (page 4.6-37). Unfortunately, there is no provision in the city planning department for correction of the traffic problems using public transit. In addition to asking the developer to widen roads, add traffic lights and left turn signals, there should be required additions to public transit services to provide alternative forms of transportation. The EIR does not even address the issue of bus services in the adjacent neighborhoods. Are there buses running along the highly congested Pomerado Road? If not, would the addition of this new neighborhood be a good time to add such a service, or to expand services that may already exist? Some EIRs do discuss the provision of bus stops in their project plans; nothing of that nature has been addressed here. This is a real lack in the EIR.

107

HYDROLOGY/WATER QUALITY/DRAINAGE

Water Quality

Both the Sycamore Estates and Montecito sub-projects would have significant direct and cumulative effects on water quality (page 4.5-18). Even with the proposed mitigation measures, the cumulative water quality impacts would remain significant. Cumulative water quality impacts associated with urban pollutants would be reduced in the Reduced Project Alternative, due to the reduced amount of impervious surfaces that would occur in this alternative (page 9-24). Erosion would also be decreased because of the reduced grading area. Since this project is mainly in the watershed of the Peñasquitos Lagoon, degraded water from the project will eventually end up in the lagoon. Within the legal implications of the federal Clean Water Act, Section 303d, the Peñasquitos Lagoon is defined as an "impaired water body" thus keeping negative impacts to water quality at a minimum is especially critical in this watershed.

108

Wetland functions are important in the maintenance of water quality and the avoidance of impacts on-site wetlands can be achieved through the use of the Reduced Project Alternative.

109

106

The commentor is correct in noting that the project would generate a significant unmitigated impact on Pomerado Road in the City of San Diego on an ADT basis. The only mitigation that would restore LOS to the minimum performance standard would be to widen Pomerado Road to provide four lanes. This improvement would be in conflict with the objectives of the Miramar Ranch North and Scripps Miramar Ranch community plans, which limit this segment to one travel lane in each direction. For the Montecito sub-project of Rancho Encantada, traffic generation rates associated with detached (rather than multi-family) units was assumed. This provides for a worst-case evaluation of project traffic impacts.

107

Please see response number 104.

108

These comments are noted.

109

These comments are noted. It is acknowledged by the EIR that the Reduced Project Alternative would reduce on-site wetland impacts, but not to below a level of significance.

LETTER OF COMMENT

RESPONSE

The reduced grading of the Montecito sub-project in this alternative as well the reduced impact to the natural flood channels due to design changes in the Sycamore Estates sub-project (page 9-24) will help to preserve the on-site wetlands.

109

BIOLOGICAL RESOURCES

The biological resources of this area include a number of rare, threatened, or endangered species and also a number of sensitive habitats, according to the Biological Resources Report. Sensitive plant and animal species covered under the MSCP are described as protected because the project meets MSCP requirements. However, impacts to wetlands, Diegan Coastal Sage Scrub, Southern Mixed Chaparral, Chamise Chaparral, and non-native grassland are considered significant. Mitigation plans for these impacts are included in the project proposal. Impacts to biological resources would be reduced in the Reduced Project Alternative; in the proposed project direct impacts to biological resources from the 2 sub-projects would be 742.9 acres (Tables 4.3-5, 4.3-6), from the Reduced Project Alternative, 400.7 acres would be directly impacted (Table 9-23). There will be no encroachment into the MHPA in the Reduced Project Alternative.

110

CONCLUSION

Although the Reduced Project Alternative provides fewer dwelling units, 758 compared to 940 in the original project, the alternative is preferred because it substantially reduces the amount of grading with subsequent alteration of landforms and visual quality, it provides more conservation of open space and biological resources, and has less impact on traffic and water quality. Both the project and the alternative provide affordable housing, 106 units in the project, 77 units in the alternative. Both also provide a 16-acre school-park site. Because there is a much greater preservation of habitat and open space in the Reduced Project Alternative, plus a reduced impact on water quality, preservation of wetlands, reduced traffic and air quality impacts, we endorse the Reduced Project Alternative.

111

Sincerely,

Janet A. Anderson
Conservation Chair

Geoffrey Smith (for both)

Geoffrey Smith
Conservation Coordinator
Sierra Club, San Diego Chapter

110 These comments are noted. It is acknowledged by the EIR that the Reduced Project Alternative would reduce on-site impacts to biological resources, but not to below a level of significance.

111 These comments are noted.

LETTER OF COMMENT

January 19, 2001

City of San Diego
Land Development Review Division
1222 First Avenue, Fifth Floor
San Diego, CA 92101

Attention: Lawrence C. Monseratte

Re: Rancho Encantada Precise Plan, Draft Environmental Impact Report
LDR No. 99-1094; SCH No. 2000011053.

Dear Mr. Monseratte,

The Scripps Ranch Community formed a Joint Committee consisting of representatives of the Miramar Ranch North Planning Committee (MRNPC), Scripps Ranch Planning Group (SRPG), Scripps Ranch Civic Association (SRCA), Scripps Ranch Recreation Council (SRR) and Save Our Scripps Ranch (SOSR) for the purpose of reviewing the Draft EIR for Rancho Encantada. The draft EIR fails to adequately analyze impacts for traffic, parks, urban stormwater runoff, biology, air quality and schools.

Unfortunately, the draft EIR did not analyze reasonable alternatives and even deferred analysis of impacts to a future action, such as grading permits or stormwater pollution prevention plans. Submitted herewith is a summary of the draft EIR deficiencies prepared by planning, engineering, landscape architectural and noise experts documenting in detail the deficiencies.

Since the Rancho Encantada Precise Plan is an amendment to the City of San Diego Progress Guide and General Plan (GPA), it must satisfy both among the elements and within each element, including mandatory and optional elements, Government Code section 65300.5. In addition, the Rancho Encantada Precise Plan, dated February 25, 2000, does not include the proposed mitigation measures identified in the draft EIR. To avoid profound adverse impacts on the Scripps Ranch Community, the Precise Plan must be revised to require proposed improvements or mitigation measures be tied to a specific build-out schedule.

- 112
- 113
- 114A
- 114B
- 114C

RESPONSE

112 Refer to EIR Sections 4.3, 4.5, 4.6, 4.8 and 4.11 for analyses of potential impacts to biological resources, hydrology/water quality, traffic, air quality and public services, respectively.

113 See response numbers 236 through 244. In accordance with State CEQA Guidelines, final EIR Section 9.0 presents a range of reasonable alternatives to the project. Analysis of impacts is not deferred; the EIR does analyze the impacts of future non-discretionary actions and has identified mitigation measures that would be implemented during various stages of the project's development, such as the preparation of a Storm Water Pollution Prevention Plan (SWPPP) prior to the issuance of grading permits.

114A California Government Code §65300.5 states "In construing the provisions of this article, the Legislature intends that the general plan and elements and parts thereof comprise an integrated, internally consistent and compatible statement of policies for the adopting agency." Adoption of the proposed project would not result in an internal inconsistency of the City of San Diego's Progress Guide and General Plan and would comply with California Government Code §65300.5. The proposed Rancho Encantada project site would implement a majority of the environmental goals, objectives and recommendations of the Progress Guide and General Plan. The Progress Guide and General Plan identifies the project site as "Area for Future Growth." As one of the proposed project actions, the Rancho Encantada Precise Plan would be considered part of the Land Use Element of the General Plan; thus, adoption of the Precise Plan would be considered an amendment to the General Plan. The Guidelines for Future Development provide goals for the areas identified for future growth. They address residential growth, provision of facilities, balanced housing, and preservation of open space. The Rancho Encantada Precise Plan complies with these goals as well as the regulatory zoning requirements set in place to implement this section of the Progress Guide and General Plan. The Sycamore Estates sub-project would be inconsistent with the Industrial Element due to cumulative natural resources (aggregate) impacts associated with Sycamore Estates' proposed rezone from AR-1-1, IL-3-1, and IH-2-1 to AR-1-1. Furthermore, as one of the proposed project actions, the Rancho Encantada Precise Plan would be considered part of the Land Use Element of the General Plan; thus, adoption of the Precise Plan would be considered an amendment to the General Plan. Please also note that the City of San Diego Progress Guide and General Plan does not contain any optional elements, and optional elements are not required to pursuant to the California Government Code.

LETTER OF COMMENT

RESPONSE

- 114B Adoption of the proposed Rancho Encantada Precise Plan is one of the discretionary actions evaluated by the EIR (see EIR Section 3.2). The EIR's mitigation measures would be enforced through a separate Mitigation Monitoring and Reporting Program (State CEQA Guidelines) and all of said measures are not required to be incorporated into the Precise Plan.
- 114C The proposed Rancho Encantada Public Facilities Financing Plan (PFFP) and the EIR's Mitigation Monitoring and Reporting Program (MMRP) provide details regarding the phasing of major on- and off-site improvements. The Rancho Encantada Precise Plan is not required to address a build-out schedule for proposed improvements.

LETTER OF COMMENT

We request that the draft EIR be revised, and recirculated for a 60 day comment period due to the complexity of the Project.

115

In conclusion, we respectfully submit our comments and look forward to resolving any outstanding issues. Please provide responses to each of the signatories.

Peggy Shirey
Peggy Shirey, Chair
Miramar Ranch North Planning Comm.

Bob Ilko
Bob Ilko, Chair
Scripps Ranch Planning Group

Marc Sorensen
Marc Sorensen, President
Scripps Ranch Civic Association

Marc Sorensen
Marc Sorensen, Chair
Scripps Ranch Recreation Council

Charles Kern Vice President, for Barbara Measelle
Barbara Measelle, President
Save Our Scripps Ranch

RESPONSE

115

Recirculation is not required because no new significant information has been added to the EIR that identifies a new significant adverse impact or the worsening of an identified significant adverse impact. Also refer to response number 102. The comments and the City's responses have been incorporated into the Final EIR and five copies will be provided to the Joint Committee Members.

**SCRIPPS RANCH/MIRAMAR RANCH NORTH
COMMUNITY COMMENTS on DRAFT EIR
RANCHO ENCANTADA – LDR No. 99-1094
STATE CLEARINGHOUSE No. 2000011053**

Environmental Setting, Chapter 2

P. 2.2, Surrounding Planned Development, Section 2.2.2: Show the location of the proposed Marine housing locations in proximity to Scripps Ranch *vis-à-vis* Rancho Encantada. There is no discussion of the cumulative effects of the 1,000 housing units that may be located next to the Rancho Encantada project. This shortcoming should be addressed in this Chapter, and also in following chapters dealing with cumulative environmental impacts.

116

P. 2.13, Sycamore Estates Sub-project: Why does not the re-zoning of a portion of the land from IL-3-1 and IH-2-1 to AR-1-1 require a phase shift? This change in land use regulation appears to be beyond the allowances of the Future Urbanizing Area as addressed by City regulations.

117

P. 2.13, Sec. 2.4.3, Proposition A/Council Policy 600-29: Note the above comment. In addition, the Project applicants are proposing the development option of Rural Cluster Development under Council Policy 600-29. A full explanation of how both sub-projects are meeting the requirements of "Rural Cluster Development" should be provided in Chapter 3. Note that in comparison to other project alternatives as described in this EIR, the degree of clustering of the proposed project appears insufficient to achieve potential environmental impact reductions.

118

Project Description, Chapter 3

P. 3-1, Sec. 3.1, the draft EIR presents the "overall goal" of the project "to provide a variety of single-family detached and affordable multi-family attached residential units in a manner that is generally consistent with applicable plans, policies and regulations" (emphasis added). Why should the goal be to be generally consistent? Why not be as consistent as possible or practicable with applicable plans, policies and regulations? The draft EIR, in fact, presents three project alternatives which are more consistent with applicable plans, policies and regulations, and (see below) there are likely other reasonable alternatives which are even more consistent. This should be corrected in the draft EIR.

119

P. 3-2: Nowhere is it demonstrated or supported that the proposed two "institutional" land use pads of this project are necessary to serve project population. In fact, it is unclear in the documentation specifically what land uses are to be allowed on these pads.

120

P. 3-2, Section 3-2: Precise Plan. Since the Rancho Encantada Precise Plan is an amendment to the City of San Diego Progress Guide and General Plan (GPA), it must satisfy both among the

121

116 EIR Section 2.2 discloses the physical environmental conditions in the vicinity of the proposed project at the time the notice of preparation was published (January 10, 2000) as required by the State CEQA Guidelines. At that time, the locations of the Marine housing options were speculative and, therefore, were not shown on Figure 2-4. EIR Sections 2.2 and 5.1 disclose that development proposals at MCAS Miramar include four options for the construction of up to 1,600 housing units and the future development of these military housing units is considered by the EIR in the analysis of cumulative effects for landform/visual quality, biological resources, transportation, hydrology/water quality, air quality, paleontological resources, solid waste disposal, water conservation, and aggregate resources. Also refer to EIR Appendix E, Traffic Study, "Buildout with Project Plus Military Family Housing" scenario.

117 The Sycamore Estates sub-project site differs from the majority of land designated for future growth in that, unlike most Future Urbanizing Area (FUA) land which was agriculturally zoned, this property was industrially zoned when the FUA designation was applied. The Managed Growth Initiative prohibits changes in zoning that allow greater development intensity; however, the proposed rezoning is from an industrial zone to an agricultural zone that is less intense than the existing zone and is a zone that is commonly used to implement the FUA designation. Therefore, a phase shift is not required.

118 As stated on pages 4.1-10 and 11 of the EIR, Council Policy 600-29 presents four options for development in the FUA. The Montecito sub-project site is zoned RS-1-8 and is proposing to cluster development pursuant to Council Policy 600-29, Option 2, which states that clustered development is permitted pursuant to the Planned Residential Development (PRD) regulations at the density permitted in the applicable zone. Council Policy 600-29 does not dictate the degree of clustering. The Sycamore Estates sub-project is proposing to cluster development pursuant to a PRD at a density not to exceed one dwelling unit per four acres for agriculturally zoned land. This is permitted under Council Policy 600-29, Option Three, and through a rezone of the Sycamore Estates sub-project site from IL-3-1 and IH-2-1 (industrial) to AR-1-1 (agricultural).

119 Comment noted. The EIR discusses the proposed project's consistency with applicable plans and policies in Section 4.1.

LETTER OF COMMENT

RESPONSE

120

It is not necessary to demonstrate that the proposed institutional land use is needed to serve the project population. EIR Section 3.2.3, Institutional Land Uses, has been clarified to state that the following uses may be permitted in areas designated as Institutional by the Rancho Encantada Precise Plan: churches, temples and places of religious assembly; botanical gardens and arboretums; educational facilities by a Conditional Use Permit (CUP); day care centers; interpretive centers; or any enterprise or business which the City of San Diego determines to be consistent with the intent and purpose of the institutional land use designation. If any use is subsequently proposed on the institutional sites that would require a discretionary permit, the lead agency would require subsequent environmental review in accordance with the California Environmental Quality Act.

elements and within each element, including mandatory and optional elements, Government Code section 65300.5. In addition, the Rancho Encantada Precise Plan, dated February 25, 2000, does not include the proposed mitigation measures identified in the draft EIR. To avoid profound adverse impacts on the Scripps Ranch Community, the Precise Plan must be revised to require proposed improvements or mitigation measures be tied to a specific build-out schedule.

121

P. 3-3, top paragraph: This states that "the overall Precise Plan density for the Rancho Encantada project site is approximately 0.35 dwelling unit per acre (941 units maximum / 2685 acres -- 0.35 du/acre)." This figure and calculation is inaccurate. This calculation includes the 248 acre City-owned parcel, which is required to be set aside as open space. It appears that including this parcel in calculating density is intended to give a public impression of very low development intensity and that the developers have voluntarily reduced proposed development.

122

Density calculations should be based on net project acreage. Acreage devoted to other land uses, including the school, park, the institutional land use development pads, MSCP and for roadways should be removed from the gross acreage. 38.5 acres are proposed to be retained as existing building development within the eastern open space area. All this acreage should be excluded from any calculation of dwelling unit density, so as not to be counted twice for land use densities/intensities, and to provide a more true, objective picture of development density.

123

P. 3-3, Proposed Land Use Acreage Summary, Table 3-1: Need to specifically describe what will be done with each of the existing buildings on the 38.5 acres.

124

P. 3-4, Sec. 3.2.3, Institutional Uses: Describing the uses allowed under this land use category "include, but are not limited to..." is not sufficient disclosure of the specific range of uses which will be allowed under the project precise plan, zoning and development agreements. Somewhere in the draft EIR, there should be a specific listing of uses permitted by zoning and development regulations under this project, or immediate reference to a section of existing City regulation providing such specific range (e.g., specific City zoning provisions). Apparently, there is no specific delineation of date, either as disclosed within the EIR or under the proposed precise plan. Without this specific delineation, both the proposed project and this EIR are incomplete. (For example, traffic analysis cannot be completed without knowing what land uses will be allowed on this acreage.)

125

P. 3-4, Sec. 3.2.4, Open Space: It is unclear why the 248 acres of City owned land is included under this project and its precise plan. This acreage should not be providing any development allowance for the remainder of the proposed project area. Are there any differences proposed under this project, as to what can happen to or be done on this acreage? Is there any different land use regulation or allowance on this acreage, comparing existing planning and zoning to the proposed project? If so, this should clearly be disclosed in the EIR, the EIR should be re-done and re-issued for a new public review period.

126

127

P. 3-4, Sec. 3.2.5, Revegetated Manufactured Slopes: This section starts, "Exterior manufactured slopes required to support development..." (emphasis added). Such manufactured slopes, in

128

121 See response numbers 114A, 114B and 114C.

122 The EIR is accurate in noting the overall Precise Plan gross density of 0.35 du/ac. This density does include the 248-acre City of San Diego-owned parcel. Excluding the 248-acre City of San Diego-owned parcel, the gross density is 0.38 du/ac. The City of San Diego-owned parcel is included within the Precise Plan boundaries and therefore the gross Precise Plan acreage (2,685 acres) and gross density used for calculation in the EIR is correct. It should be noted that since distribution of the Draft EIR, the number of total units has been reduced by six for a total of 935 dwelling units.

123 The City of San Diego Municipal Code Section 101.0901 establishes the criteria for calculation of net density within Planned Residential Developments (PRD). The net acreage that is used to determine density includes the project site minus the area of existing public streets. This is the method for calculating density that has been used to determine the number of units permissible within the Precise Plan.

124 As noted in the final EIR (see Section 3.0, Project Description and Table 3-1, Proposed Land Use Acreage Summary), the Sycamore Estates sub-project site contains existing buildings that may be phased out and converted to open space or uses consistent with the open space designation. The future use of these buildings would be determined by the City of San Diego. The City would have the exclusive right to elect which buildings would remain and which buildings would be removed and converted to open space. Remaining buildings would be used consistent with the open space designation.

125 See response number 120. The project's Traffic Technical Report analyzes 12 acres of institutional uses and states that these uses are "anticipated to provide houses of worship" for purposes of conducting the traffic analysis. An ADT generation rate of 30 ADT/acre was assumed for these 12 acres.

126 In a letter dated July 21, 1999 directed to the San Diego City Manager, the Scripps Ranch Civic Association requested preparation of a comprehensive master plan for the Beeler Canyon Future Urbanizing Area. Pursuant to this request and with the concurrence of the City of San Diego, the City-owned 248-acre parcel was included in the Precise Plan area. Being surrounded by the Sycamore Estates sub-project on three sides, it is logical, and preferable, for this parcel to be included in the Precise Plan. This 248-acre parcel would remain as open space.

LETTER OF COMMENT

RESPONSE

127 The 248-acre City of San Diego owned-parcel was conveyed to the City of San Diego by General Dynamics as consideration, in part, for the New Century Center Development Agreement. At that time, the parcel was being considered for inclusion within the MHPA. Subsequently, the parcel was included entirely within the MHPA (with the exception of a road crossing), and up to 25 percent of the parcel is permitted to be developed in accordance with the City's MSCP Subarea Plan and Implementing Agreement. However, under the proposed Precise Plan, no uses inconsistent with the open space designation would be permitted. No biological mitigation credit or residential density allocation is given to either the Montecito or Sycamore Estates sub-projects from the 248-acre City-owned parcel. Also see response number 102.

their extent and their location, are not required to support site development. This is clear in the presentation of several project alternatives which each substantially reduce grading. It is more accurate to say, "Exterior manufactured slopes which the proposed project proposes to create."

128

Between Sections 3.2.4, 3.2.5, and figure 3-1, the reader is given the impression that all areas colored "open space green" on figure 3-1 will be natural, undisturbed open space. However, the project's proposals for utility connections including water service, sewer service and drainage, as well as other improvements, will heavily impact the "open space" periphery of development pads. Grading to install such facilities and permanent improvements to maintain access to such facilities such as access roads, will largely compromise surrounding open space, including MSCP-MHCP designated open space. This should be clearly described in Section 3.2.4, and shown on the map figure 3-1. The acreage of open space land to be so compromised should be disclosed.

129

P. 3-5, figure 3-1 The presentation of dwelling units per acre figures in the Totals row of the "land use abstract" table, is inaccurate as previously stated. This page and similar references in the draft EIR need to be corrected, and a revised draft EIR circulated for public review.

130

P. 3-6, Vehicular Circulation Plan, Section 3.2.6: A representative of the City of Poway has stated that it will close Beeler Canyon Road to the general public by vacating the existing right-of-way. No alternative for secondary access to the proposed project has been provided.

131

P. 3-6, Sec. 3.2.7, Bicycle and Pedestrian Circulation The use of non-contiguous sidewalks and meandering paths increases the "walkability" of the project area. The Scripps Ranch Community has asked that discontinuous sidewalks (sidewalks separated from curb by a 5 foot parkway) be implemented throughout the residential streets of Montecito and Sycamore Estates.

132

Because it is directly adjacent to the Sycamore Canyon/Goodlen Ranch open space areas, the Rancho Encantada site presents a unique and valuable opportunity to develop high quality recreational resources. The concept is to develop a system of pedestrian/bicycle-friendly walks and pathways, and connect these to a trail system which accesses open spaces within the project with links to County preserves including the larger Mission Trails system. The full potential of this concept will not be realized until further elements including equestrian access are specified within the Precise Plan. The project Precise Plan should be amended as follows, and the draft EIR reflect these revisions:

133

- Establish pass-throughs and lanes linking the school/park site with the surrounding neighborhood to promote pedestrian access. Extend the concept to the institutional sites.
- Develop the trail system within the Montecito development and link to pedestrian/bicycle-friendly walks and paths within Montecito to create a unified system within the project
- Pedestrians, mountain bicycles and horses are not naturally compatible on narrow trails with blind corners. Achieve compatibility by widening trails (about 12 to 16 feet), creating separate mountain bike and horse trails or with other appropriate elements
- Develop trailheads with parking space for 20 cars, a staging area and restrooms. Potential sites include the NW (Beeler Road and Creek Road area) and NE (Rolling Hills Stables area) segments of the project or open space

128 On page 3-4 of the Final EIR, the word "required" has been changed to "proposed."

129 EIR Section 4.3, BIOLOGICAL RESOURCES, analyzes the impacts of all proposed ground disturbance, including the facilities that would occur in areas designated as open space. EIR Section 3.2.4 states that "firebreaks, trails, trailheads, SDG&E utility corridors and easements, water and sewer lines, pumping stations, water storage reservoirs, existing building pads that would be converted to open space or used consistent with the open space designation, and other utility infrastructure are permitted in open space." In addition, footnote number 3 to Table 3-1, Proposed Land Use Acreage Summary, discloses that utility improvements and trails are included in the open space acreage. Similarly, land uses that are considered compatible with the objectives of the MSCP and are permitted uses in MHPA open space include utility lines and roads, limited water facilities and essential public facilities, and brush management zone 2 (see EIR Section 2.4.6, page 2-15). Including all existing and proposed utility easements and facilities, road easements and trails, it is estimated that approximately 80 acres of the Precise Plan's 1,989.2-acre open space designation would accommodate such facilities.

130 The Density columns on the Figure 3-1 Land Use Abstract represent the density range permitted by land use category and are correct as shown. No changes are necessary to the EIR based on this comment and recirculation is not warranted. Also see response number 102.

131 Street "B" is proposed to connect the proposed Project site with Beeler Canyon Road. The City of Poway has indicated that it may consider closing Creek Road, not Beeler Canyon Road. If Creek Road is closed to public traffic, Street "B" would still be constructed, but would serve as emergency-only access. EIR Section 4.6, TRANSPORTATION, page 4.6-36, discloses that no additional significant adverse traffic impacts would occur in the event that Street "B" served as an emergency-access only roadway. In addition, Sections 4.7, NOISE, and 4.8, AIR QUALITY, also disclose (see Table 4.7-2 and 4.8-6 footnotes) the potential effects of Street "B" functioning as an emergency-only access.

132 The issue of noncontiguous vs. contiguous sidewalks is a planning-related issue and does not affect the environmental analysis or conclusions of the EIR.

133 The EIR evaluates the environmental effects of the proposed trail plan included in the Rancho Encantada Precise Plan. Suggested revisions to the trail plan are noted. If the future managing agency of the on-site open space areas decides to establish a trail system that differs substantially from that addressed in the Rancho Encantada Precise Plan and evaluated by this EIR, additional environmental analysis may be required in accordance with CEQA.

♦ Create access to equestrian facilities such as Sycamore Canyon Stables at the East end of Sycamore Canyon Road (Thomas Brothers Map (TB) 1191 C6) from the ridge-top power-line road to the south of the stable. Existing horse trails within the City of Poway should be considered when deciding connections and trailheads. Additional stables include: Rolling Hills Stables (TB 1191 A6), at the corner of Sycamore Canyon Road and Beeler Canyon Road. This site should be considered as a future trailhead.

133

P. 3-9, Conceptual Water, Sewer and Drainage Plans, Section 3.2.8: What are the environmental impacts of the water lines, water easements, and water tank to be built in the open space?

134

What are the environmental impacts of the sewer lines, sewer easements, and pump stations that will run through the open space? Have these impacts been included in the environmental impact analysis?

As described here, water and sewer lines are proposed over open space areas, including MHPA-designated open space preserve. Easements over such lines, and "a 15 foot wide all-weather maintenance [permanently paved] road" will compromise this open space. Grading will also be necessary to lay the lines, and make easement access roads drivable. The draft EIR should disclose specifically how much grading is necessitated, how much acreage of open space area is so compromised, and types of mitigation.

P. 3-10, Gravity Sewer Option: Project analysis fail to identify the number of parcels or extent of impact to private property

135

P. 3-10 and 3-15 and figure 3-6, Drainage Plan: Substantial utility facilities off-site of the residential padded areas and within the project "open space" areas will substantially compromise open space integrity. Not only drainage lines/swales, but also graded detention and desiltation basins are proposed. Twelve desiltation and detention basins are indicated on figure 3-6 within open space. However, the extent of grading and brush clearance specifically to accommodate these facilities is not indicated on any graphic, notably, figure 3-1, and a separate delineation of grading (volume and area extent) for these facilities is not disclosed. This should be, including those volumes and extents in open space.

136

P. 3-16, Montecito Sub-project Planned Development Permit, Section 3.3.2: The Montecito PRD site plan and the Precise Plan should be revised to include private recreation facilities (pool, spa, tennis courts, and small clubhouse) and discontinuous sidewalks.

137

P. 3-25, Sycamore Estates- Affordable Housing Site Plan, Figure 3-13. Are the proposed affordable units for-sale or rental?

138

P. 3-30, General Plan Amendment, Section 3.5: The proposed General Plan Amendment should meet all the statutory requirements and the underlying Precise Plan should be of sufficient detail to set forth the sequence and timing of the major on-site and off-site improvements for the project. The currently-proposed Precise Plan appears insufficient for this purpose.

139

134 See response number 129.

135 The environmental effects of the gravity sewer option are adequately addressed in the EIR. Whether the gravity sewer line is constructed on private or public property does not affect the adequacy or completeness of the environmental analysis contained in the EIR.

136 See response number 129. As is common practice in long-range planning documents, and as its title implies, the Precise Plan Land Use Plan (Figure 3-1) depicts land uses. It is not appropriate to show proposed drainage infrastructure or brush management areas on the land use plan. Drainage facilities are conceptually shown on Figure 3-6, Precise Plan Conceptual Drainage Plan. The design of these facilities, including the disturbance area required to accommodate them, is shown on Figures 3-8 through 3-16. Brush management areas are shown on Figures 3-9 and 3-14.

Section 4.2, LANDFORM /VISUAL QUALITY, discloses the total grading quantities for the Montecito and Sycamore Estates PRD/VTM's, including grading quantities proposed for utilities and detention basins. The significance criteria for grading quantity (EIR Section 4.2.2, criterion a., page 4.2-6) is based on the average grading quantity per graded acre. To determine the significance of impacts, it is not necessary to break-out the grading quantities for drainage facilities proposed in areas designated as open space.

137 This comment does not address the adequacy or completeness of the EIR. Suggested revisions to the Montecito PRD site plan design are noted. The project complies with the open space requirements of the Planned Residential Development regulations. Additional private recreational space is not required by the regulations. See response number 132 regarding the issue of sidewalks.

138 Analysis of the affordable housing units, whether for rent or for sale, is an economic issue not relevant to the analysis of physical changes in the environment. At this time, the type of unit is not known. The units would, however, meet all requirements for affordable housing per the San Diego Housing Authority and the City of San Diego.

139 This comment relates to the phasing of planned improvements rather than the analysis of physical changes in the environment. The commentor is referred to the proposed Rancho Encantada Public Facilities Financing Plan (PFFP) and the EIR's Mitigation Monitoring and Reporting Program (MMRP). The Rancho Encantada Precise Plan is not required to address the sequence and timing of proposed improvements. Also see response no. 114A.

P. 3-30, Rezone, Section 3.6 Does the rezone of Sycamore Estates from LL-3-1 and LH-2-1 to AR-1-1 require a phase shift? 140

P. 3-32, Section 3.8, Development Agreement Amendment: This brief paragraph is an inadequate description of the nature of the amendment of an existing development agreement. What are the terms of the existing agreement, and how specifically does the proposed project propose to change terms and circumstances for the site and the City? None of this is currently presented, in this chapter, Project Description; in Chapter 2, Environmental Setting, where the nature of the current development agreement should be presented; or in Chapter 4, Impact Analysis. This should be fully described in a revised draft EIR, made available for a new public review period. 141

Chapter 4, Environmental Impacts

Land Use Impacts, Sec. 4.1

P. 4.1-13, Land Use Impact Analysis re: Transportation: Additional traffic from the project along Spring Canyon Road could result in significant noise impacts to existing residents. The setbacks and buffers in certain locations are not adequate based on recent neighborhood complaints. 142

P. 4.1-13, Land Use Impact Analysis re: Industrial Element: 222 acres of industrially zoned land may be developed into other uses and this is inconsistent with the City's Industrial Element. An assessment of the loss of 222 acres of industrial land in the City should be made. 143

P. 4.1-15, Land Use Impact Analysis re: Recreation Element: The Montecito sub-project should be required to provide the requisite amount of parkland acres and should pay City park fees, whether Sycamore Estates is built or not. 144

Landform and Visual Impacts, Sec. 4.2

P. 4.2-7, Landform and Visual Impact Analysis, Section 4.2.2: The proposed project exceeds the significant threshold of 2,000 cubic yards of grading per developed acre. The Sycamore Estates sub-project is proposing 24,899 cubic yards per acre, which is over 12 times the City standard. No justification or explanation of criteria to allow this exceedance has been provided. The same comments pertain to the 23,529 cubic yards per graded acre proposed to be moved on the Montecito sub-project (pg. 4.2-11). 145

P. 4.2-19, Landform and Visual Impact Analysis re: Precise Plan: Given the significant changes to landform, the Draft EIR states, "the Project proposes to grade the site to conform with the site's existing topography." In fact, the project is proposing massive amounts of grading with no detail on how the grading will conform to the existing topography. 146

140 See response number 117.

141 Although the details of the proposed agreement do not affect the adequacy or completeness of the EIR, Section 3.8 of the EIR has been modified to more clearly describe the agreement.

Section 3.8 of the EIR has been replaced as follows.

3.8 Agreement Between the City of San Diego and the Owners of Sycamore Estates

A portion of the Sycamore Estates sub-project site is currently controlled by the terms and conditions of a Development Agreement between the City and General Dynamics filed with the City of San Diego City Clerk's Office on December 2, 1997 as Document No. 00-18448. In addition, that same portion of the site is also subject to a Conservation Agreement and Declaration of Restrictions between General Dynamics and the City dated June 9, 1998 and recorded in the San Diego County Recorder's Office as Document No. 1998-0432188.

An agreement between the City of San Diego and the owner of Sycamore Estates sub-project is proposed to modify the obligations of the City and Sycamore Estates with respect to the Development Agreement. The new agreement provides for a substitution of certain extraordinary benefits originally bargained for in the Development Agreement. Specifically, performance of the new agreement would eliminate any obligation by Sycamore Estates to establish a conservation bank upon the site and to share proceeds of conservation bank sales with the City. Instead, the new agreement would obligate Sycamore Estates to convey Park Land to the City for the expansion of Mission Trails Park, to add new MHPA land to the City's MSCP Preserve (shown on Figure 4.3-8 on page 4.3-50), to establish an endowment trust fund for long-term maintenance of conserved property within Sycamore Estates, and to make a cash payment to the City for the purpose of funding improvements to Mission Trails Park and within the Kearny Mesa community.

142 Traffic noise impacts along Spring Canyon Road are included in EIR Table 4.7-2. The direct project impact is shown to be 1-2 dB. Increases of less than -3 dB are generally imperceptible under ambient conditions. Final EIR page 4.7-6 shows that an increase of -3 dB is the threshold of significance on a project-specific basis. Cumulative vehicular noise along Spring Canyon Road exceeds the City's Noise Land Use Compatibility Chart (EIR Table 4.7-1). The increment attributable to the proposed project, however, does not exceed significance thresholds for direct and cumulative impacts.

- 143 The 222 acres noted by this comment refers to the number of acres that would be developed with industrial uses under the Existing Zoning-No Project Alternative discussed in EIR Section 9.2. The assessment of loss of industrial land is made in the EIR in Section 4.1, which concluded that the project would have a significant and unmitigated land use impact due to Sycamore Estates' inconsistency with the Industrial Element of the Progress Guide and General Plan. The potential environmental effects of the proposed project, including the proposed rezone, are adequately evaluated by the EIR in accordance with CEQA.

An analysis of the marketability of the industrial land was included in the San Diego Association of Governments "San Diego Region Employment Land Inventory and Market Analysis." The least marketable category of "Vacant Unmarketable" was applied to this location due to the site's inconsistent industrial zone designation with the City's Future Urbanizing Area (FUA) designation (see response number 117), the highly constrained nature of the site (steep hillsides), limited access/improvements required for large scale vehicles, potential impacts on the adjacent MHPA resulting from industrial development, and the amount of grading needed to prepare the site for industrial development.

- 144 As stated in EIR Section 4.11, the Montecito sub-project would generate the need for 2.46 acres of public parkland. This impact would be fully mitigated through either the development of a public park adjacent to an elementary school site on the Sycamore Estates sub-project site or through payment into the proposed Rancho Encantada Public Facilities Financing Plan. The payment of City park fees is not necessary to mitigate impacts and is therefore not required.

- 145 The EIR discloses a significant and unmitigated direct and cumulative landform impact due to grading more than 2,000 cubic yards per graded acre. Mitigation measures contained in EIR Section 4.2 would reduce, but not to below a level of significance, this significant impact. The Reduced Grading Alternative discussed in EIR Section 9.5 also would further reduce, but not to below a level of significance, significant landform impacts. Per CEQA Statutes, the purpose of an environmental impact report is to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided. CEQA requires the decision-maker to balance the benefits of a proposed project against its unavoidable environmental risks in determining whether to approve the project. In order for the decision-maker to approve the project's significant and unmitigated visual quality/landform impacts, the decision-maker would have to adopt project "justifications" disclosed in Findings and a Statement of Overriding Considerations for the EIR which would be included in the record of the project approval.

146 The EIR is correct in noting the site would conform with the existing topographic character, as the existing character of the site is comprised of ridges, valleys, and steep side slopes. The cut and fill slopes created would be similar in character, orientation and slope ratios to the existing slopes on the project site. Figures 4.2-2, Montecito VTM Manufactured Slopes, and 4.2-3, Sycamore Estates VTM Manufactured Slopes, numbers the proposed manufactured slopes on each sub-project site. All manufactured slopes would have a maximum gradient of 2:1 and highly visible slopes would have varied slope gradients to better reflect a natural condition. Mitigation measures 4.2-1 and 4.2-2 indicate that prior to the issuance of grading permits, the City of San Diego's Planning and Development Review Department would review final maps and grading plans to verify implementation of contour grading of manufactured slopes with the exception of certain slopes that the City determined would not be highly visible from public viewing areas.

LETTER OF COMMENT

P, 4.2-19, Landform and Visual Impact Analysis re. Precise Plan: No detail on the visual impact of the school on the surrounding housing has been provided

147

Recreation Trails Impacts (Ref. Draft EIR, Project Description, pp. 3-6/Sec. 3.2.7, 3-8/fig. 3-3, and Environmental Analysis, Ch. 4)

148

There is a brief description in Chapter 3 of proposed trails, but no impact analysis in the draft EIR regarding existing trails, trail planning, and interconnections. The draft EIR environmental analysis chapter should be amended to add such analysis. This analysis should include the following:

- An important aspect of the trail system is the connections to existing trail networks, trail heads, and equestrian facilities. Next in importance after these issues is the development of new trails.
- Mountain bicycles and horses are not naturally compatible on narrow trails with blind corners. Two ways of achieving compatibility is to widen trails (about 12 to 16 feet) or to create separate mountain bike and horse trails. (These do not appear to now be differentiated in the project description.)

Stormwater/Water Quality Impacts, Sec. 4.5, Hydrology/Water Quality

How will storm runoff from Rancho Encantada be treated so that it does not pollute the canyons and beaches? Section 4.5, Hydrology/Water Quality of the draft EIR discusses the fact that the project will entail impacts, and in pp. 4.5-19 through 4.5-24 discusses mitigation measures to be detailed after discretionary project approvals. But it appears that no detailed analysis of pollution loads, and the detailed analysis and measures to be applied through subsequent permitting, has yet been done. It would be more consistent with the Clean Water Act and State RWQCB to provide these details now, prior to discretionary approvals, and to outline them in the draft EIR and appendices as appropriate.

149

150

No analysis has been provided on the potential impact to existing private wells and septic systems of the residents in the Future Urbanizing Area (Beeler Canyon).

151

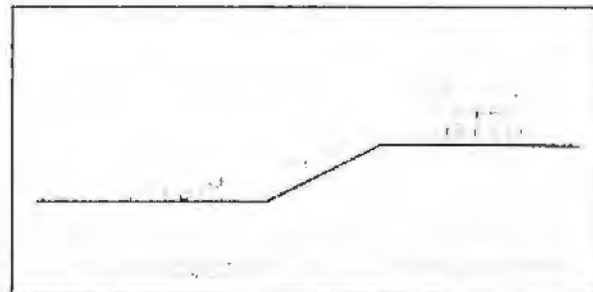
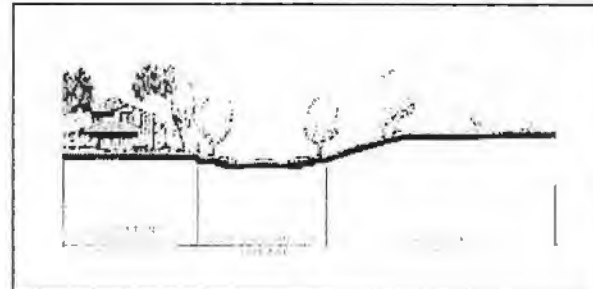
Transportation/Circulation Impact Analysis, Sec. 4.6

Community Primary Access: The draft EIR does not provide and analyze primary access using Scripps Poway Parkway/Kirkham Wy or any other possible connections with Scripps Poway access. The analysis should include the advantages and disadvantages of one access vs. others including mitigations. As an example, Scripps Poway Parkway volume and Level of Service between Community Rd and Pomerado, travel distances/time to daily community needs (schools, supermarkets, gas, stores).

152

RESPONSE

147 A cross section between the proposed on-site elementary school and the proposed on-site surrounding housing is included as Figure 17, School/Park/Residential Interface, in the Rancho Encantada Precise Plan and is reprinted below. According to the significance criteria for Visual Quality (EIR page 4.2-18), significant visual quality impacts would not occur from construction of the proposed elementary school because the school would not block public views to significant visual landmarks or scenic vistas, would not severely contrast with the surrounding neighborhood character, and would not have a negative visual appearance.



148 See response number 133.

149 150 EIR Section 4.5 addresses the question of how storm and urban runoff from Rancho Encantada would be treated during and after construction. The process set forth by the EIR is the process outlined in Order 2001-01 recently adopted by the San Diego Regional Water Quality Control Board. The permanent post-construction water quality protection measures are described in the EIR and shown on the proposed Tentative Maps. Mitigation measures and tentative map approval conditions are included that would require ministerial approvals (grading and building permits) be conditional upon the detailing and analysis necessary at final project design. Detailed analysis of pollution loads and detailed design of the measures is premature until that final design detailing and analysis has been performed. The EIR presents an adequate level of detail to determine that direct impacts to water quality would be mitigated to below a level of significance, but because best management practices are not 100 percent effective, the cumulative impacts would remain significant and unmitigable.

151 Rancho Encantada's domestic and irrigation water would be supplied by the City of San Diego water system; thus, potential impacts to well water draw down would be precluded. The most common sources of contamination of wells in areas like Beeler Canyon are septic systems located near the wells and pesticide and herbicide use by residents with wells on their own properties. Well water contamination from sources farther away is less likely to be significant. It is likely that groundwater in Beeler Canyon currently has low (part per billion range) organic contamination of a man-made origin. Additional contribution by the Rancho Encantada project is not likely to result in the exceeding of a Maximum Contaminant Level (MCL) as established by the Clean Water Act. The Rancho Encantada project proposes permanent water quality measures that address potential negative impacts to ground water quality. The variety of measures proposed for the Project work in different ways and together. Certain water quality measures work to settle contaminants from the runoff prior to leaving the site or infiltrating into the ground. Other measures use vegetation to filter contaminants from the runoff. Mechanical devices that separate the hydrocarbons from the runoff are used in parking lot areas where oils and solvents could be discharged. Herbicides and pesticides in standing water rapidly break down in the presence of oxygen and sunlight, conditions supplied by the proposed extended detention basins. Refer to mitigation measures 4.5-1 through 4.5-9.

The Proposed Project would likely result in some increased groundwater recharge. Increased water recharge does not result directly in a higher water table, and the water table would not be increased such that existing septic systems would be negatively impacted. The relationship of increased recharge to water table height is hydrologically complex, but it can be concluded that the increase in water table height as a result of the Proposed Project would be insignificant. The most noticeable effect would be increased groundwater in the dry season.

LETTER OF COMMENT

RESPONSE

152

This comment is inconsistent with the analysis. As discussed in EIR Section 9.1.2, the Sycamore Estates sub-project PRD/VTM application to the City of San Diego in September 1999 proposed primary access to the site via a northerly route through the City of Poway. This alternative was considered but rejected by the lead agency because of the lack of circulation integration with Montecito and increased impacts to the Beeler Canyon Regional Wildlife Corridor. In addition, traffic impacts would not differ significantly from the traffic impacts associated with the proposed Project, except that more traffic would be expected to use Beeler Canyon Road.

The EIR evaluates potential environmental impacts of the proposed project, which proposes primary access to the site from Pomerado Road and secondary access from Beeler Canyon Road. Direct access from Scripps Poway Parkway, Kirkham Way or other roadways are not proposed; it is not necessary for the EIR to evaluate options that are not proposed or alternatives that are considered infeasible. Due to the City of Poway's direction that a northerly access road through their jurisdiction would not be approved, additional access alternatives to the north were considered infeasible. Pursuant to State CEQA Guidelines §15126.6(f)(1), *"among the factors that may be taken into account when addressing the feasibility of alternatives are . . . regulatory limitations and jurisdictional boundaries."*

The EIR does not analyze Beeler Canyon Rd as primary access and possible improvements in relation to the environment such as less slope impacts, conservation of canyons and natural habitat. 153

The EIR does not address alternate access to Sycamore Canyon Road, I-15 or State Highway 52. Such analysis should be provided. 154

Primary Access Intersection: The EIR report does not specifically address the exact location of the intersection with relation to other intersections addressing traffic queue distances between, width of intersection/capacity, and impacts on the current traffic flow and expected delays for residents. 155

Project Dependency and Mitigations: The EIR states that "transportation improvements for each sub-project are not dependent on each other" referring to the two projects, Montecito and Sycamore. The EIR does not clearly identify the timing and improvements of the presented traffic mitigations if either project not developing or developed later. 156

Marine Access: Traffic analysis was performed assuming 1,000 Marine units "taking access from Pomerado Rd." It is unclear as whether this access will be allowed through Rancho Encantada after it is established and overall impacts. The potential access of the Marine complex should be address including the use of Rancho Encantada. 157

The traffic data presented in the draft EIR is inaccurate. Existing traffic volumes as presented are too low, particularly in the Mira Mesa Blvd./Scripps Ranch Blvd./Carroll Canyon vicinity. Do these volumes take into account the expected traffic from the Monarch development and the proposed middle school? The draft EIR traffic analysis should be redone to take into account more accurate, higher existing traffic volumes. 158

There is a discrepancy between traffic volumes presented in the EIR for the Scripps Ranch Middle School (proposed in the Scripps Ranch Business Park), and the traffic volumes presented in this Rancho Encantada draft EIR, particularly for the Mira Mesa Blvd./Scripps Ranch Blvd./Carroll Canyon vicinity. Again, the draft EIR traffic analysis should be redone to take into account more accurate traffic volumes as exemplified in the Middle School EIR. 159

SANDAG and Traffic Model Contain Substantial Study Flaws. The EIR states that "In response to Community concerns, the City of San Diego undertook a major effort to calibrate SANDAG model." Scripps Ranch Groups, specifically SRCA Transportation and Traffic Committee (SRTTC) request for calibration using ACTUAL counts by collection of data using traffic volume counters was not used. SRTTC determined two separate City divisions were using conflicting data. The data collected was then compared showing that the "baseline" model was uncalibrated, therefore providing underestimated traffic results. As an example, traffic model shows Scripps Poway Parkway with an existing 25000 ADTs, collected volume counter data is 38000. The model still remains uncalibrated. This is one of the many areas evaluated. 160

153 The EIR evaluates potential environmental impacts of the proposed project, which proposes primary access to the site from Pomerado Road and secondary access from Beeler Canyon Road. Because primary access from Beeler Canyon Road is not proposed, it is not necessary for the EIR to evaluate that option. Also see response numbers 131 and 152.

154 The EIR evaluates potential environmental impacts of the proposed project, which proposes primary access to the site from Pomerado Road and secondary access from Beeler Canyon Road. Because alternate access to Sycamore Canyon Road, I-15 or State Highway 52 is not proposed, it is not necessary for the EIR to evaluate those options. Providing primary access via these roadways would require the construction of a new collector road crossing one or a combination of MHPA open space areas, the Sycamore Canyon County Open Space Preserve, or federal MCAS Miramar property. Such alternatives were considered infeasible by the lead agency. Pursuant to State CEQA Guidelines §15126.6(f)(1), "among the factors that may be taken into account when addressing the feasibility of alternatives are . . . regulatory limitations and jurisdictional boundaries."

The Traffic Technical Report (EIR Appendix E) includes an evaluation of six transportation network alternatives which were considered feasible by the City of San Diego. Network Alternative 1, which forms the basis for analysis in EIR Section 4.6, assumed that the existing street network would be retained with minor modifications. Network Alternative 2 assumed the extension of SR-125, Network Alternative 3 assumed the provision of a viable north/south travel alternative in the western portion of the study area (i.e., the Spring Canyon Road extension), and Network Alternative 4 assumed the provision of two new north/south routes for regional commuting traffic. Network Alternative 5 analyzed direct project access to/from Poway via Kirkham Way, but no extension of SR-125 or Spring Canyon Road. Finally, Network Alternative 6 assumed SR-125 to be extended to Scripps Poway Parkway and that the Sycamore Estates sub-project would be developed with a substantially higher traffic generation.

155 The precise location of the proposed Pomerado Road/Rancho Encantada Parkway intersection is shown on the Montecito VTM, and intersection spacing and turn bay storage have been determined based on projected future traffic volumes. The required distance between this intersection and the Pomerado Road/Spring Canyon intersection, centerline-to-centerline, is approximately 1,200 feet.

156 Both sub-projects would be required to assure the construction of the required mitigation prior to recordation of the first final map for either Montecito or Sycamore Estates, whichever is recorded first.

157 At the time the study was initiated, the US Navy Southwest Division was studying a number of alternative sites for the Military Family Housing (MFH) project. The most appropriate approach from a worst-case traffic analysis perspective was to assume that the MFH project would load its traffic to Pomerado Road, south of Rancho Encantada Parkway, since other locations would have lesser impacts on the congested segments of Pomerado Road, east of I-15. In addition, the US Navy indicated no desire to take direct access through Rancho Encantada

158 The existing and daily peak hour traffic data published in the Traffic Technical Report were the most current at the time the project's traffic study was initiated. The majority of project impacts and mitigation measures were identified in the Buildout (Year 2020) condition, which was developed based on the traffic model developed by the City of San Diego, with land use inputs from the City of Poway. As discussed in response number 72, the forecast for the Rancho Encantada project indicates higher volumes than the more generic SANDAG Year 2020 forecast. Based on this, the project's impacts are not understated and the background growth is accounted for based on conservative assumptions.

159 See response numbers 72 and 79.

160 Use of the term "calibration" was a misstatement. In Gail Goldberg's December 17, 1999 letter to Linda Sloan, calibration of the traffic model was specifically excluded from the services to be provided by City staff. The efforts associated with model refinement were limited to "clean up" of the network and incorporation of development proposals known at the time the work was done. Validation of model results to match ground counts is an exhaustive process that was not in the City's work program and could not be accommodated within the time frame of the project. As discussed in response number 72, City efforts on traffic model refinements far exceeded those ordinarily completed for development proposals. With respect to the ADT on Scripps Poway Parkway the 25,000 ADT shown in the traffic study is not a modeled volume, but an existing count. Discrepancies between the existing volume shown in the traffic study and other data discussed in this comment could be explained in a number of ways, including:

- Daily or seasonal fluctuations in traffic
- Calibration of data collection machinery
- The traffic counts could have been conducted at different locations

LETTER OF COMMENT

Data from Traffic Studies prepared by individual developers at specific intersections was compared to the model finding discrepancies. This example clearly shows that there has been no effort by agencies to continue to update the model with already approved development data and associated traffic studies, therefore the error continues to carry-over and developers continue to use erroneous data. The results are not representative of ACTUAL counts and scenarios previously used. Example: Intersection #7 Scripps Summit and Scripps Poway Parkway. Project Study AM-PM/Model AM-PM 180/563/20-17, 19/44/2-7, 260-748/1-8, 683-327/29-21, 2272-1054/1637-1171, 105-285/63-47, etc

161

There are inconsistencies with the percentages presented at the intersections not adding up, in addition to losing traffic trips, between intersections when no other intersections are in-between, (i.e., eastbound Pomarado Road between Chabad and Avenida Magnifica).

162

There is no explanation or specific reasons on how/why the percentages were attributed as shown

There is no reference as to whether the following projects were included and supported Traffic Study incorporation in the SANDAG model

163

- Mira Mesa Market Center
- Gateway - Shea and Kaufman & Broad
- New Middle School
- Northridge
- Scripps Ranch Business Park- Intel and Newport National
- Monarch
- Pomarado & Spring Canyon (29 homes)
- Marine housing (1,000 homes). This project has been mentioned in the DEIR.
- Fairbrook site (elementary school, park, 17 homes)
- USR) expansion
- Chabad Master Plan
- Scripps Ranch High School Master Plan (Ahrens Field)

The traffic models include major collectors and arterials but not residential streets. Many of the collector streets used in the model have abutting residences with driveways. After major collectors exceed capacity, it starts using the "path of least resistance", i.e. residential collectors. The draft EIR does not address those instances where the model started diverting and assigning additional traffic through RESIDENTIAL collectors, having a direct impact on speed, volume, and noise and pollution generation which impact the quality of life in neighborhoods. Mitigations or an allocation of funds is needed to address these impacts to existing residential infrastructure

164

No analysis for mass transit was included to support the proposed residential or institutional development.

165

Traffic Delay Tables for Intersections and I-15 Ramps: The draft EIR is not clear as whether the presented values are "programmed" traffic light times or actual measured and the dates/time and

166

RESPONSE

161 See response number 160.

162 With respect to existing counts matching between intersections, it is expected that volumes may not match precisely for a number of reasons, including:

- Traffic may be diverted to intervening driveways
- Counts may have been conducted on different days
- Counts at adjacent intersections may have slightly different peak hours due to side street volumes

163 See response number 72.

164 The traffic model does not include residential streets and therefore does not assign traffic to these roadways. However, recognizing the potential for traffic diversion to residential streets, mitigation measure 2 on page 190 of the Traffic Technical Report recommends improvements to Spring Canyon Road to address community concerns.

165 See response numbers 104 and 107.

166 The ramp meter rates included in the study are actual rates obtained from Caltrans, District 11. Queues and delays were estimated using standard procedures outlined in the City of San Diego's *Traffic Impact Study Manual* (1998). Observations for other projects have found that these procedures overstate delays and queues. A field check was conducted to identify actual delays versus calculated delays under existing conditions. This is summarized in Table 2.4-1 of the Traffic Technical Report (EIR Appendix E). As shown in this table, the observed delay at I-15/Mira Mesa Boulevard westbound-to-southbound on-ramp was approximately 10 minutes, while the calculated delay was 53 minutes (nearly an hour per vehicle).

LETTER OF COMMENT

calculations used. The delays presented for ramps and queues are underestimated and not a reflection of the worst case scenario being experienced frequently as a result of recent established developments and traffic light timing west of I15 which impacts the ability for East I15 traffic to seek alternate route access as a result of gridlock traffic. The EIR fails to analyze the impacts to I-15.

166

Level of Service and mitigation requirements: The draft EIR states that the "acceptable Level of Service for San Diego intersections is D." Mitigation measures are required for any deterioration from this Level, and no mitigation has been presented despite the additional traffic added by the project resulting in a Level of Service below D. Any changes to land use and existing approved structures within a specific zone must be required to provide funds for the improvement of the traffic infrastructure within the community even if experiencing a Level of Service D or below, otherwise, there are no incentives and funds for improvements. Example: 4S Ranch contributions to I-15 corridor.

167

School vs. No-school Traffic Analysis: There is no assurance that the Poway School District will use the funding provided by the developer to build a school on-site. The draft EIR fails to analyze outgoing traffic as a result of no school on site and how this can affect traffic overall.

168

Construction Traffic and Access: The draft EIR does not address the impacts of the construction traffic and duration, access and the fact that no heavy trucks are allowed on Pomerado Rd.

169

The draft EIR does not provide any information as whether the proposed mitigations 4.6-6 and 4.6-7 specific to I-15 are feasible since these improvements have a direct impact on future auxiliary lane project and CALTRANS controls these improvements and not the City of San Diego.

170

The proposed EIR mitigation measures only address ONE I-15 on-ramp and not the Mira Mesa, Carroll Canyon and Scripps Poway Parkway I-15 on and off ramps and impacts associated to the control of traffic signal as a result of City and CALTRANS traffic light ownership and control.

171

Any mitigation in Spring Canyon Road should address the speed and safe pedestrian movement along or across since many parks and schools are abutting the Road and extensively used by pedestrians.

172

Mitigation 4.6-1: the draft EIR must clearly specify what is meant by a modified four-lane major street and provide diagram to clarify.

173

Mitigation 4.6-4: The draft EIR must include diagram of the proposed improvements to this intersection and the intent of this mitigation.

174

Mitigation 4.6-5: Unclear as what is the intent of this mitigation, provide additional analysis justifying additional turning movements.

175

RESPONSE

167 The City of San Diego's minimum performance standard in generally built-out areas, such as the I-15 corridor, is LOS D. According to the *Traffic Impact Study Manual*, mitigation is required when the minimum performance standard is not met AND the project generates a significant impact (based on seconds of delay at intersections and on changes in volume-to-capacity ratios on street segments).

168 The proposed elementary school would generate 720 daily trips, with an estimated 560 daily trips assumed to be "captured" within the site. If the school were not constructed on the site, the project's traffic generation would be reduced by 720 daily trips, including the trips coming to the school from outside Rancho Encantada (160 ADT). The project's external traffic was not reduced to reflect internal trips to/from the school site. Thus, if a school was not constructed within Rancho Encantada, the number of external trips would remain the same as evaluated by the Traffic Technical Report.

169 Construction traffic hours of operation are governed by City of San Diego guidelines. The ADT volume associated with construction would be substantially lower than the ADT volume of the proposed project at buildout and would therefore have lesser impacts from a traffic perspective. In addition, construction traffic would typically occur during off-peak hours. A discussion of construction traffic has been added to final EIR Section 4.6, TRANSPORTATION.

170 See response number 22.

171 Because the project would not have a significant impact at I-15/Mira Mesa Boulevard, I-15/Carroll Canyon Road or I-15/Scripps Poway Parkway, no mitigation for these intersections is warranted and none is recommended in the EIR.

172 Comment noted. (See mitigation measure number 2 on page 190 of the Traffic Technical Report).

173 The proposed design of this road segment varies from the specifications in the City of San Diego Street Design Manual for a four lane major arterial in terms of median width and curb-to-property-line dimensions. These variations were necessitated because of constraints imposed by surrounding topography.

174 A conceptual sketch of this improvement is contained in Appendix K of the Traffic Technical Report.

175 These improvements would restore LOS to D or better conditions during both peak hours under Buildout with Project conditions. Appendix J of the Traffic Technical Report provides worksheets summarizing this analysis.

LETTER OF COMMENT

Mitigation 4.6-9. It is recommended that this mitigation measure be revised to delete the Spring Canyon Road signals proposed at Semillon Blvd. and Scripps Creek Drive. Semillon appears too close to Blue Cypress to allow for smoothly flowing traffic conditions, and the signal at Scripps Creek has already been funded by the City of San Diego by other means (scheduled to be installed in February). A new traffic analysis should be presented to evaluate the installation of a signal at either Sunset Ridge Dr. or Spruce Run Drive, whichever provides the best traffic flow efficiency. Another traffic analysis should be conducted for the intersection of Hasbrook and Spring Canyon for purposes of reducing traffic speeds, pedestrian safety and a signal, due to the fact a new school is being built on this segment of Spring Canyon and Rancho Encantada residents are expected to use the shopping center across the street from the school as their primary shopping area. Existing speeds on this segment of Spring Canyon are already averaging 35 mph and traffic calming is needed.

176

Additional traffic analysis and impacts are required beyond the mitigation areas of Pomerado Rd and Scripps Creek Drive since the development will generate traffic and use along Spring Canyon Rd. as the main access to food areas, gas, shopping malls. The analysis should take into consideration speeds and safety of pedestrian, turn pocket queues and distances, as well as impacts in getting in/out by residents from existing streets.

177

Mitigation 4.6-10. Address the impacts if any of pedestrian crossing at intersections to the overall timing synchronization.

178

Safety is a higher priority than circulation, therefore calming techniques such as pedestrian fan areas, and landscaped medians should be required and shown.

179

No restrictions to turning movements are proposed other than what currently exist on Spring Canyon Road.

180

A dedicated right turn lane is needed from northbound Pomerado Road to eastbound Scripps Parkway. Where no such lane currently exists. This should be added as a mitigation measure, in this section and in the rest of the Transportation impact analysis section.

181

An analysis of improvements to the intersection of Spring Canyon and Scripps Ranch Blvd., particularly with respect to westbound left-turning movements and stacking is needed.

182

Noise Impact Analysis, Sec. 4.7

Ref. Appendix P to the draft EIR, "Noise Report" (Technical Appendices, Volume III dated November 21, 2000). The Noise Impact Analysis provided in these technical appendices to the Rancho Encantada EIR is incomplete. The reasons for this finding are as follows:

RESPONSE

176 See response number 164.

177 See response number 164.

178 See response number 164.

179 See response number 164.

180 See response number 164.

181 See response number 175.

182 The project does not generate a significant impact to a failing LOS at this location. Accordingly, no mitigation is warranted and none is recommended.

- Table 1 of the Noise Impact Analysis specifies traffic noise levels along the transportation corridors affected by Rancho Encantada traffic. The Noise Impact Analysis indicates on page 9 that noise impacts associated with the project-generated traffic were assessed by the Federal Highway Administration traffic noise prediction model. The Federal Highway Administration assesses traffic noise levels based on the information on traffic volume, speed, mix, sound propagation conditions (so-called "hard" or "soft" sound propagation rate), and other variables. In addition, CNEL descriptor used in the Noise Impact Analysis depends on the 24-hour traffic flow conditions. The Noise Impact Analysis does not specify what traffic flow (traffic volume, mix, speed, 24-hour distribution) and traffic noise propagation conditions were used in the traffic noise prediction estimates. Without this information, validity of the traffic noise level information given in Table 1 cannot be verified. The technical noise study should include the above information. The noise study must also provide information that verifies the validity of the traffic flow and traffic noise propagation assumptions used in the traffic noise prediction estimates. 183
- While assessing traffic noise impacts to the project site, the Noise Impact Analysis assumes that at 200 ft from the Pomerado Road centerline, traffic noise level would be within CNEL=62 dB. There is no information in the Noise Impact Analysis that verifies the above finding. Technical noise study should include complete information on the variables used in the traffic noise prediction estimates. The technical noise assessment must also include information that verifies the validity of the traffic flow and noise propagation assumptions used in the traffic noise prediction estimates. 184
- As has been noted above, the Noise Impact Analysis assumes that at 200 ft from the Pomerado Road centerline, traffic noise level would be within CNEL=62 dB. That apparently assumes a certain traffic volume on Pomerado Road. However, Traffic Impact Analysis for Rancho Encantada EIR (Appendix E) considers several traffic flow scenarios for Pomerado Road. Therefore, it appears that the Noise Impact Analysis must address all of these scenarios. The noise impacts associated with each traffic flow scenario should be clearly identified. 185
- The Noise Impact Analysis suggests on page 12 that "The maximum noise reduction needed to meet the City noise standard is perhaps 8 dB." This finding conflicts with other findings of the Noise Impact Analysis. 186
- Appendix F includes a Memo dated September 11, 2000. The Memo provides additional information on barrier height for traffic noise mitigation within the Rancho Encantada property and on needed interior noise mitigation. The information is rather generic in nature and is not supported by any technical data. As has been noted above, findings of a technical noise study must be supported by technical information that justifies the validity of the findings and validity of technical data used in the noise prediction estimates. 187
- The Noise Impact Analysis indicates on page 9 that "none of the project-related noise increases equal or exceed the +3 dB CNEL increase considered as individually significant noise impact." The Noise Impact Analysis does not specify who established the "+3 dB CNEL increase" as the criterion for assessing the traffic noise level increase significance. This information should be provided. 188
- While assessing construction noise impacts, the Noise Impact Analysis does not mention potential noise impacts from haul truck traffic that might be associated with the project. 189

183 "Default" input assumptions for the traffic noise analysis were derived from several nearby environmental studies that were likely to experience the same types of travel speeds, vehicle mixes, diurnal distributions and propagation conditions. These projects included the "Scripps Ranch Mixed-Use Master Plan" (1999) and the "Mira Mesa Market Center" project (1997). It was presumed that Rancho Encantada traffic patterns would be very similar to these nearby projects. Traffic volumes, as the most critical noise level determinant, were obtained from the proposed project's Traffic Technical Report.

184 The two closest end points of the traffic projections along Pomerado Road that may affect the project site are between Spring Canyon Road and Legacy Point. The forecast buildout traffic volume on Pomerado Road adjacent to the project site is 22,160 vehicles per day. The City of San Diego CEQA guidelines provide a traffic noise curve that suggests that noise level at 50 feet from the roadway centerline for any daily volumes (ADT) is expressed by:

$$CNEL = 65.7 + 10 \text{ LOG } (ADT / 10000)$$

A slightly higher reference level to account for more evening traffic was used as opposed to the reference level used in the City's guidelines. The noise reference equation used in the Rancho Encantada noise report is:

$$CNEL = 67.8 + 10 \text{ LOG } (ADT / 10000)$$

The values in the project noise report are thus +2.1 dB more conservative (higher) than in the City CEQA guidelines. For any other distance beyond the 50-foot reference distance, noise levels at distance D are given by:

$$CNEL (D) = CNEL (50') + 10 \text{ LOG } (50 / D)^{\alpha}$$

where $\alpha = 0.5$ for "soft" sites

For example, for the 22,160 ADT forecast for Pomerado Road,

$$CNEL (50') = 67.8 + 10 \text{ LOG } (22160)$$

$$= 71.3 \text{ dB}$$

$$CNEL (100') = 71.3 - 4.5$$

$$= 66.8 \text{ dB (rounded to "67" in report)}$$

$$CNEL (200') = 62.3 \text{ dB (rounded to "62" in report)}$$

The analysis thus is based upon more stringent guidelines than those suggested in the City's CEQA guidelines using standard acoustical propagation assumptions.

185 The assumed traffic volume in the Noise Technical Report was the future buildout, with project volume as the worst-case traffic noise condition. As the noise analysis assumed "worst-case" conditions, noise analyses of the different traffic flow scenarios contained in the Traffic Technical Report is not necessary.

186 This comment notes a typographical error on page 12, paragraph 4 of the Noise Technical Report. The needed exterior noise reduction is 3 dB, as referenced on page 12, paragraph 3 of the Noise Technical Report.

187 The lot-by-lot noise attenuation analysis was semi-generic in nature because exact housing footprints have not yet been established for each lot. EIR Appendix F calculated the needed solid perimeter barrier heights based upon grading shown by the proposed tentative maps and the minimum yard setbacks established by the proposed Planned Residential Development (PRD) Permits.

Please see response number 184 regarding the technical input data used in the noise analysis. As indicated in response no. 184, the analysis uses values that are 2.1 dB more stringent than City of San Diego analysis guidelines. The requirement for a break in the line of sight for a receiver 10 feet inside the residential lot line is expressed as follows:

$$\frac{\text{Wall} + \Delta H}{D} = \frac{5 + \Delta H}{D = 10}$$

Where wall is the needed wall height, ΔH is the pad/roadway grade separation, and D is the distance from the roadway centerline to the property line.

The wall height would meet the exterior noise standard of 65 dB CNEL for ground floor receivers; however, second-story bedroom windows would not be protected by the noise attenuation wall. The City of San Diego would require a final acoustical report in conjunction with applications for building and occupancy permits to verify that interior noise standards of 45 dB CNEL would be met as required. Mitigation measures 4.7-1 and 4.7-3 require the preparation of these subsequent acoustical reports.

LETTER OF COMMENT

RESPONSE

188

The +3 dB CNEL criterion was adopted for this EIR by the lead agency from a number of approved noise studies completed in the project vicinity. It is derived from observational evidence that the instantaneous human noise discrimination threshold under laboratory conditions is ± 1.5 dB. Under ambient conditions, with the changes spread out over 10-20 years of traffic growth, a +3 dB CNEL threshold is the most common analysis threshold used for environmental analysis. The City of San Diego identifies a +3 dB sound level change as the minimum change perceptible to the human ear.

189

Haul truck traffic would not impact public streets. Cut and fill is anticipated to be balanced on the project site, therefore, haul truck traffic would occur internally to the project site and would not use existing public streets. The grading operation itself would be subject to the noise control measures contained in the City of San Diego Municipal Code Section 59.5.040, Construction Noise. These measures state that construction activity (including grading) shall not cause, at or beyond the property lines of any property zoned residential, an average sound level greater than 75-decibels during the 12-hour period from 7 a.m. to 7 p.m.

implementation (significant amount of grading). This issue should be addressed. The noise study should also address potential for construction noise impacts to "noise sensitive" biological habitat (if any) on site and off site. 190

• On page 2 the Noise Impact Analysis suggests that Caltrans bases its significance determination on a "peak one-hour level of 67 dB LEQ." Actually, Caltrans bases its significance determination on a one-hour level of 66 dB L_{EQ}. 191

Section 4.7 of the Rancho Encantada draft EIR contains practically the same information as the Noise Report given in Appendix F. Therefore, based on the reasons listed above, Section 4.7 appears to be incomplete as well. In addition, the draft EIR text includes additional statements that appear to be either incomplete or incorrect. The reasons for this finding are as follows:

P 4.7-3 While describing "Significance Criteria" the EIR indicates that "Short-term construction-related impacts would be regarded as significant if noise levels would impact existing land uses above the noise levels specified in the City of San Diego Noise Land Use Compatibility Chart (see Table 4.7-1). Impacts also would be considered significant if construction noise violated the City of San Diego Noise Ordinance for construction or grading (Section 59.5/0404 of the City of San Diego's Municipal Code)." Construction noise impacts are regulated by the Noise Ordinance but not by the Land Use Compatibility Chart. Therefore, the first sentence of the two sentences quoted above appears to be incorrect. 192

P 4.7-6 While describing "Significance Criteria" the EIR indicates that development-related noise impacts would be regarded as significant "if Project-generated traffic would increase existing vehicular noise levels along public or private roadways by 3 dB CNEL or greater." No information is provided in relation to the City of San Diego or Federal/State regulations that established such a significance criteria. This information must be provided. 193

P 4.7-8: The EIR indicated that the first set of homes closest to Pomerado Road "would shield and protect any interior units" and therefore "impacts to homes other than those closest to the roadway would not be significantly impacted." The above finding is valid at specific topography configuration, residence placement, size and orientation. Without information on the above variables, this finding could be misleading. Text of the above statement should also be revised since "impacts to homes" cannot be "impacted." 194

P 4.7-9 Based on the reasons listed in these comments, "OFF-SITE NOISE IMPACTS" discussion given on this page appears to be unjustified. For example, the EIR indicates that "An existing block wall is located along the west side of Pomerado Road, between the roadway edge and existing residential homes which adequately reduces vehicular noise impacts on existing residential homes to below a level of significance." Neither EIR nor Appendix F include any information that justifies this finding. 195

P 4.7-11: The noise mitigation conditions listed suggest that "a subsequent acoustical analysis shall be performed by a qualified acoustician to verify incorporation of *identify* all necessary noise 196

190 EIR Section 4.3, BIOLOGICAL RESOURCES, evaluates potential indirect noise impacts to sensitive biological resources. Indirect noise impacts to coastal California gnatcatcher are considered significant for the Sycamore Estates sub-project, and mitigation measure 4.3-19 would reduce this indirect impact to below a level of significance.

191 Comment is noted. For clarification, the federal noise abatement criterion, as used by Caltrans, is 67 dB LEQ as stated. A mitigation analysis is required if impacts "approach or exceed" this threshold. For purposes of definition, Caltrans has selected 66 dB LEQ as "approaching" the standard.

192 Both significance criteria apply to short-term construction noise. The Land Use Compatibility Chart relates to the receiver and the Noise Ordinance relates to the noise source.

193 City of San Diego environmental guidelines are based on meeting the standards in the Land Use Compatibility Chart and compliance with the Noise Ordinance. An increase of 3 dB CNEL is used in the EIR because it is the level of increase necessary to be perceptible to the average human ear.

194 The conclusion about the first tier of homes shielding interior units can be substantiated with the following considerations: a) the first tier of homes already would not exceed the City of San Diego noise compatibility standard; b) the second tier of homes is even farther away; and c) the second tier of homes would have their front yards toward Pomerado Road with the house itself additionally shielding their backyard patios or pools even farther away from the road. The words "impacts to" in the referenced sentence have been stricken from the final EIR.

195 No site-specific monitoring was conducted at this location as part of the Rancho Encantada EIR. The location and height of the existing barrier was designed to achieve appropriate noise reduction as part of subdivision approval.

196 This correction has been made to mitigation measure 4.7-1.

control requirements on building and site plans." Text of the noise mitigation conditions listed on page 4.7-11 should be revised.

196

Air Quality Impact Analysis, Sec. 4.8

Sec. 4.8.1, Existing Conditions:

P. 4.8-2: The draft EIR fails to measure ambient air quality of the proposed site. Instead it is speculated that the air quality obtained from the Kearny Mesa monitoring site would be equivalent to Rancho Encantada, without any scientific data to support this assumption. The draft EIR should be amended to either provide site-specific ambient air quality measures, or to demonstrate the levels of similarity/differences between the two sites.

197

P. 4.8-2: The draft EIR should focus only on the more stringent of each ambient air quality standards category. The State of California has more stringent air quality standards than the Federal requirements. The draft EIR should not try to minimize not meeting the State standards by stating a less stringent Federal standard.

198

P. 4.8-3: The ozone levels stated in this analysis appeared to come from data from the Del Mar monitoring station (see Table 4.8-2) and not Kearny Mesa. There is no data that demonstrates that results from the Del Mar monitoring station would be similar to those that would be obtained from the Rancho Encantada site. The draft EIR should be corrected in this matter, or demonstrate the levels of similarity/differences between the three sites.

199

P. 4.8-3: Table 4.8-2, Rancho Encantada Air Quality Monitoring Summary, fails to summarize results for sulfur dioxide, sulfates, lead and visibility reducing particles. The draft EIR should summarize for these pollutants, and provide related impact analyses.

200

P. 4.8-4: In the Sources of Pollution section the draft EIR states that a 25% decrease in NO_x and ROG would allow the SDAB to meet Federal standards. The draft EIR fails to state the decrease required for meeting State standards; this should be provided and considered in significance of impact.

201

Sec. 4.8.2, Impact Analysis:

P. 4.8-6, Construction-Related Impacts - The draft EIR only estimates the impact that construction at the site will have. The draft EIR fails to show any air quality data from construction sites similar to the proposed site.

202

P. 4.8-7: The draft EIR states both 2568 and 2657 acres for the site. Which one is correct?

203

P. 4.8-7: The draft EIR discusses research about a PM-2.5 but fails to cite any references. It appears that this discussion is an attempt to minimize any concerns about the PM-10 standard for

204

197

Air quality measurement is normally not performed on a site-specific basis unless there are unique characteristics to the proposed project that depend critically upon site-specific knowledge. The assumption in air quality analysis is that important pollutants such as ozone are regional in nature, and that the regional air quality network operated by the SDAPCD adequately characterizes regional differences to the extent that they exist. The use of available air quality measurements from the Kearny Mesa station is satisfactory for the purpose of describing existing conditions. No changes are necessary to the EIR based on this comment. Also see response number 102.

198

The final EIR does focus only on meeting the most stringent air quality standards in cases where the State air quality standard is more strict than the corresponding federal standard. For example, Table 4.8-6, the microscale "hot spot" analysis, is based solely on the California one-hour CO standard of 20 ppm instead of the less stringent federal one-hour standard of 35 ppm.

199

The "Del Mar" entry in Table 4.8-2 has been revised. The data entries are all from the San Diego APCD Kearny Mesa (Overland) monitoring station as shown in the "Source" line at the bottom of this table. The Kearny Mesa site is the closest monitoring station to Rancho Encantada. Please see response number 197 regarding regional data applicability.

200

Monitoring activities for sulfur dioxide, sulfates and lead have shown the San Diego Air Basin to be in compliance for many years. Measurements have been discontinued, or are performed at only one or two sites in the County because levels are so low. There are no monitoring stations and, therefore, no data available near the project site, but air quality levels for sulfur dioxide, sulfates and lead are presumed to be well within acceptable levels. "Visibility reducing particulates" are included in the entry entitled "Respirable Particulates (PM-10)" in Table 4.8-2.

201

The most current estimates of ozone precursor emissions total 234 tons of NO_x and 239 tons/day of reactive organic gases (ROG). These emission levels are the threshold levels that appear to allow the basin to meet the federal hourly ozone standard (met in 1998 and 1999). The hourly State standard is one-sixth more stringent than the federal standard. Assuming that there is a linear relationship between emissions and air quality, the additional needed reduction to meet the State standard is estimated as follows:

$$NO_x = 234/6 = 39 \text{ tons/day}$$

$$ROG = 239/6 = 40 \text{ tons/day}$$

Note that the SDAPCD has not developed or approved this estimated calculation reduction. Air pollution creation depends upon numerous factors (location, time of day, weather patterns, etc). A formal plan for meeting specific emissions reduction targets to attain the State ozone standard has not been developed by the SDAPCD because there is no specific attainment deadline as there is for federal standards.

LETTER OF COMMENT

RESPONSE

- 202 Construction activity impacts vary from site to site, from day to day, and from activity to activity. The focus on construction impact assessment is therefore not to develop emissions estimates, but to concentrate on effective mitigation because the estimates have a substantial level of uncertainty. The variation in construction activity impacts would not change the conclusion of the final EIR that short-term construction impacts would be significant and that cumulative short-term fugitive dust impacts would be significant and unmitigable.
- 203 The total project site acreage has been corrected to 2,658 acres.
- 204 PM-2.5 research is cited extensively in the EPA staff reports and public testimony during the development of the federal PM-2.5 standard. There is no effort to undermine the importance of PM-10. The entire fugitive dust and construction equipment exhaust discussion is based upon significant levels of PM-10.

LETTER OF COMMENT

Suspended Particulate Matter. The State requirements for Suspended Particulate Matter is based on the PM-10 measurement, not PM-2.5.

204

Page 4.8-8: The draft EIR states that prevailing daytime west to east winds will impact areas east of the construction site. However, the Draft EIR fails to state that this area is occasionally subjected to Santa Ana winds that move from east to west. During Santa Ana wind conditions particles will be blow into the Scripps Ranch communities.

205

P. 4.8-8: No threshold was stated for NO_x or PM-10 for additional impact on the microscale environment analysis.

206

P. 4.8-9: The draft EIR estimates pollution based on free flowing traffic. However, there will be frequent times when traffic will not be free flowing, especially, with no traffic mitigation.

207

P. 4.8-9: The draft EIR states a buildout around 2020. Will 2020 be the scheduled buildout for this project? Or is this estimated to be surrounding community buildout? This should be clarified. Note that buildout analysis including full project development and surrounding community full development (irrespective of date that buildout is achieved) must be provided.

208

P. 4.8-12: The draft EIR fails to give data related to secondary project impacts. This should be corrected.

209

P. 4.8-13: The draft EIR suggests means to reduce dust during the grading process. The draft EIR is willing to accept "stop work" order if the dust abatement program is not being complied with. Recommend that the draft EIR may be fined also for non-compliance. Measures to reduce grading and construction dust should be included in a mitigation, monitoring and reporting program.

210

P. 4.8-13: The draft EIR suggests that only tune-ups of heavy equipment will be performed prior to the start of construction in order to mitigate NO emissions. However, no additional mitigations, such as monitoring the heavy equipment and additional tune-ups have been suggested. It is strongly recommended that these specific measure be included in a monitoring program.

211

P. 4.8-13: The impact analysis minimizes the impact of CO on the microscale environment. There is expectation of "clean" vehicles. Although the State has mandated cleaner vehicles in the future, these types of mandates have been delayed in the past. Recommend that the draft EIR includes analyses with no new clean vehicles technologies.

212

P. 4.8-14: The draft EIR fails to take actual measurements for the Microscale Impact Analysis. The draft EIR uses less accurate traffic analysis. Recommend that the draft EIR monitor at least some of the intersections.

213

RESPONSE

205 Comment noted. During Santa Ana winds, dust levels are high throughout the region such that the impact of any single source would be masked by the background. The existence of this phenomenon, and the extra care to be taken for dust control, is acknowledged in mitigation measure 4.8-1 which requires an accelerated watering schedule when winds exceed 15 mph.

206 There are no local NO_x impact thresholds because most NO_x is emitted as NO (nitric oxide); however, the clean air standard is for NO₂ (nitrogen dioxide). The NO to NO₂ conversion takes several hours. In several hours, locally generated emissions have dissipated. The construction activity impact assessment did consider microscale effects of PM-10. PM-10 impacts from grading operations are considered significant. The grading equipment may travel all over the site as opposed to traffic confined to a single roadway. It is therefore not possible to explicitly predict future grading activity PM-10 exposure at any given location. The significance of the magnitude of PM-10 emissions during grading is, however, acknowledged in the EIR.

207 The URB7G computer model incorporates the effects of variable traffic speeds. The mean travel speed used in the calculation is 25-30 mph. This represents a mixture of free-flow (off-hour freeway and mid-block arterial) and congested (peak hour freeway and arterial intersection) speeds. The commentor is incorrect in stating that there is no traffic mitigation. Mitigation for transportation impacts is identified in final EIR Section 4.6.

208 The EIR estimates buildout of both the community and the proposed project by the Year 2020.

209 Secondary project impacts are generally either much smaller than mobile sources (such as from natural gas in stoves, heaters, hot water, etc.), or they are regional in nature (power plant exhaust, haze, etc.). The most dominant secondary impact from general development derives from the electricity consumed by project residents. With deregulation, however, the electricity consumed in any given airshed was not necessarily generated within that airshed. There is therefore no geographic nexus between electrical consumption and its generation. Secondary impacts are recognized on page 4.8-12 of the EIR, but are not quantified because quantification would be speculative due to the deregulated electrical power market. The sewer lift station is also a secondary source of potential impact, and its impact potential is discussed on pages 4.8-10 and 4.8-11 of the EIR. Secondary impacts would not be regarded as significant on a project-specific basis, but cumulative level contributions were considered in the determination that the proposed project would have a significant cumulative air quality impact.

210 Mitigation measure 4.8-1 is adequate for grading and construction dust generation and no further mitigation measures are necessary. This mitigation measure also is included in the project's mitigation, monitoring, and reporting program (MMRP).

LETTER OF COMMENT

RESPONSE

- 211 Mitigation measure 4.8-2 has been clarified to state that additional Low NO_x tune-ups may be required periodically over the course of project construction, by the City of San Diego.
- 212 The future emissions were calculated using the models that State and local agencies [Air Resources Board (ARB), Air Pollution Control District (APCD), etc.] have approved for planning purposes. A limited amount of market penetration is assumed for "clean" vehicles. The ARB has refused to delay implementation of clean vehicle targets. Furthermore, the bulk of forecast emissions improvements derive from retirement of older cars independent of any new clean air vehicle technology. The margin of safety between forecast worst-case exposures and the most stringent standard is so large that any minor changes in emissions assumptions would have a negligible impact on the analysis of air quality impacts and would not effect the conclusions of the final EIR.
- 213 The microscale analysis combines the worst-case local impact with the worst-case regional background levels. The predictions are for future conditions that can not be monitored until they occur. The use of a worst-case theoretical combination of local and background CO levels introduces a substantial level of conservatism (over-prediction) into the findings that indicate that standards would be met with a large margin of safety. Therefore, the EIR's analysis is sufficient and monitoring is not required.

P 4.8-14. The analysis of the intersection of Spring Cannon Rd and Pomerado Rd is missing from Table 4.8-6. Recommend that the draft EIR include this information

214

Cultural Resources Impact Analysis, Sec. 4.9

Based on a review of the draft EIR and the cultural resources technical reports (Appendices H1 - H5), a Native American consultation program was not conducted for the proposed project. Page 8 of the Sept. 7, 1999 report titled "An Enhanced Archeological Survey of the 237-Acre Montecito Project" prepared by Brian F. Smith & Associates (Appendix H1) states that "the field reconnaissance did not reveal any evidence of cultural deposits. For this reason, no Native American assessment or consultation was requested." However, cultural resources were identified on the Rancho Encantada project site, and Native American consultation should be conducted under the City's cultural resource guidelines regardless of whether cultural resources are found by an archeological study. The draft EIR should be amended in this section to include such consultation, and any amended conclusions which may follow.

215

Public Services Impact Analysis, Sec. 4.11

Fire and Police Protection

The Montecito sub-project allows for private, gated roadways within the site. Access to gated areas often increases emergency response time due to the additional time necessary for emergency vehicles to gain access through a locked gate. Often there is a different gate access mechanism for fire protection and ambulance personnel than for law enforcement officers. This anticipated increase in response time, and proposed means of emergency access through a locked gate for fire protection personnel, ambulance service and law enforcement officers should be addressed in the EIR.

216

Schools & School Impact Analysis:

The draft EIR analyzes schools impact using 1999-2000 school enrollments to compare against the added enrollment of the project houses. Year 2000-2001 enrollment levels are now available to provide a more accurate current-year impact analysis. These more current enrollment figures should be presented.

217

More importantly, other geographic areas within the Poway Unified School District are yet to be developed under their own existing planning and zoning designations. It is inappropriate to exclude from analysis the already-planned and zoned generation from these other undeveloped and underdeveloped areas. (In fact, CEQA Guidelines, Sec. 15130 paragraphs (a), (b) and (d) require the cumulative impact consideration of these other geographic areas.) The draft EIR must be redone in this section to analyze project impact not only in terms of current-year schools enrollment, but currently-planned buildout enrollment as well. This is likely to disclose a more significant impact from the proposed project.

218

214

The analysis in Table 4-8-6 includes only those intersections that operate now, or are forecast to operate in the future, at a level of service (LOS) of "D" or worse during the stagnant meteorology a.m. peak hour. The suggested intersection does not meet the analysis criteria.

215

For clarification, no cultural resources are located on the Montecito sub-project site. The resources referred to in this comment are identified on the Sycamore Estates sub-project site. As listed on EIR pages 10 and 11, the Native American community was notified of the availability of the Draft EIR. Comment numbers 505 - 507 were received from the San Diego County Archaeological Society. No comments from the Native American community were received. No evidence has been found to indicate the resources located on the site are of Native American importance. The cultural resource analysis for the project site has been conducted in accordance with the City of San Diego Historical Resource Guidelines. Please see mitigation measures 4.9-1-4.9-6 in Section 4.9 of the EIR.

216

Gates within the proposed project would be equipped with override systems for use by emergency personnel. The San Diego Police and Fire Departments are trained in using override systems and their use does not significantly affect response times. In addition, mitigation measure 4.11-4 requires that a fire response time analysis be performed prior to the issuance of building permits for each development phase in Sycamore Estates. Such analysis would take the presence of gated entries into consideration. If the structure is located outside of a six-minute response time from an existing fire station, a fire sprinkler system would be installed in the structure to reduce impacts to below a level of significance.

217

Pursuant to State CEQA Guidelines, an EIR must include a description of the physical environmental conditions in the vicinity of the project, as at the time the notice of preparation is published. The environmental setting would normally constitute the baseline physical conditions by which a lead agency determines whether an impact is significant. The notice of preparation for the *Rancho Encantada* EIR was published on January 10, 2000. At that time, the 1999-2000 school enrollment data were the most current. Because the 2000-2001 enrollment data were not available until well after the notice of preparation was published, the 1999-2000 data were appropriately used in accordance with CEQA.

LETTER OF COMMENT

RESPONSE

218

EIR Section 5.0. CUMULATIVE EFFECTS, considers buildout of the Poway Unified School District area in accordance with applicable long-range plans and approved but not yet built development projects within the District. As stated in EIR Section 5.2.6, the addition of elementary, middle and high school students to schools serving the proposed Project site would result in significant cumulative impacts. The conclusion of significant cumulative impacts would still apply even if the enrollment projections for future development areas of the District are increased or if the geographic areas of the District boundaries are adjusted. Thus, the conclusions of the EIR related to school impacts remain unchanged and no additional analysis is warranted. Also see response number 217.

Draft EIR P. 4.11-4 top paragraph, states that "the conveyance of [an elementary school site] to the Poway Unified School District would reduce the project's cumulative impact on elementary school capacity to below a level of significance" 219

The draft EIR implies that provision of an elementary school campus on this project site is a necessary objective (draft EIR page 3 1). However, in discussion's with Ms. Burgoyne, Poway School District, she disclosed that the Poway Unified School District does not require that the Rancho Encantada project provide land for an elementary school on this project site. The school district can instead identify impact fees which will compensate for acquisition of a differently-located school, or expansion of other already-existing or planned schools. This fact is not disclosed in the draft EIR, but should be, as project alternatives which do not include a school campus can be more accurately analyzed for related traffic impact reduction, as well as reduction of other related impacts such as air quality. (In oral presentations to the Scripps Ranch community, the project applicants have represented that their project homes would generate 75% of the enrollment of the on-project elementary school. However, the figures of the draft EIR [p. 4.11-8 et. seq.] indicate that elementary enrollment generated by this project would total 439 students at build-out. Per Ms. Burgoyne, the planned enrollment capacity of a Poway Unified School District elementary school is 770 students; the draft EIR cites up to 800 students. Thus, this project is projected to generate about 55% of school enrollment at build-out. This difference may alter projections of traffic trips projected to be generated by the school use as part of this project as proposed.) Project objectives as presented in the EIR (p. 3-1 and elsewhere, including in alternatives analyses) should analyze the exclusion of a school campus on site. 220

We also note that the Poway Unified School District is not listed in the draft EIR, p. 10, as a public agency provided review of the draft EIR. 221

Parks:

The EIR does not address the joint-use of the proposed Poway School District elementary school recreational fields with the City of San Diego Parks Department. Per Debbie Von Wensel, Director of the Northern Parks Division for the City Parks and Rec. Department, the City of San Diego is requiring an 8-acre park, to consist of 4 acres of City park and 4 acres of joint use with the proposed elementary school. This joint-use requirement should be clarified and detailed in the EIR. 222

The EIR states that in the event the Sycamore Estates sub-project including the proposed park/school is not built, the Montecito sub project would be required to pay into the City's park fee program to reduce public park impacts. Paying a fee in lieu of providing actual park land does not solve the problem of providing adequate park space for recreational activities. The EIR should be amended to require adequate park space to be provided within the Montecito development instead of fees paid in the event the park/school is not built in Sycamore Estates. 223

219 Comment noted.

220 The elementary school site is part of the proposed project and, as such, is analyzed accordingly in the EIR. The provision of a school site is, appropriately, an objective of the proposed Project. As with nearly all master-planned development projects, school sites can be identified and offered for conveyance (usually by either purchase or dedication) to the governing school district. The school district then has the discretion of accepting or declining the site based on need, location, and other factors. If the Poway Unified School District decides to decline the proposed elementary school site on the Sycamore Estates sub-project site, elementary school students generated by the proposed project would attend other existing or planned schools in the District. If the elementary school is not developed on the Sycamore Estates' sub-project site, then the adjacent public park would be expanded to a minimum of 8.05 net acres (see mitigation measure 4.11-2). Irrespective of whether the elementary school site is developed in Rancho Encantada, the payment of statutory Senate Bill 50 (SB-50) fees would reduce impacts to below a level of significance. It should be noted that SB-50 prohibits local lead agencies from imposing school mitigation beyond the statutory fee. Because the number of students is unknown at this time, the school's traffic generation was estimated based on its acreage. Also see response number 168.

221 A copy of the draft EIR was provided to the Poway Unified School District by the City of San Diego.

222 In accordance with the Progress Guide and General Plan, the park size based on a population based calculation would be approximately eight acres; however, the neighborhood park in Rancho Encantada is proposed to be four acres due to its location adjacent to the proposed elementary school site. A joint use agreement may occur, but is neither required nor anticipated.

223 EIR Section 4.11 discloses that the Montecito sub-project would generate the need for 2.46 acres of public parkland. This acreage is not of sufficient size to warrant the requirement for public parkland dedication within the Montecito sub-project, in the event that the Sycamore Estates sub-project is not developed.

LETTER OF COMMENT

No park/school development plans are provided in the EIR, therefore it is not possible to analyze the adequacy of the one proposed park. A detailed plan showing the recreational facilities planned for these developments should be provided.

224

No private recreational facilities are included in the Precise Plan beyond those proposed for the affordable housing component, nor evaluated in the EIR. It is recommended the scope of the private recreational facilities be expanded. Such private recreational facilities should include a swimming pool, tennis courts and multipurpose rooms for children's programming and community gatherings, and may include additional amenities to be determined at a future date.

225

The Precise Plan should be amended to include subsurface drains in the parks especially along the perimeter and under the infield and sand play areas in order to insure useable play areas.

226

The Scripps Ranch Recreation Council (SRRC) has provided the following park assessment for the Rancho Encantada development. This assessment refers to facilities that should be included in the Precise Plan and subsequently evaluated in the EIR.

227

"Rancho Encantada will be a somewhat geographically isolated community with respect to the City of San Diego. Its closest neighbors will be the City of Poway and the community of Scripps Ranch. What this means from a recreational perspective is that the community of Scripps Ranch will offer any potential "tiering" of San Diego City Recreational assets.

As we know the City of San Diego has a population-based park structure that is comprised of mini-pocket parks, neighborhood parks, community parks and regional parks. Examples of these would be:

- Mini-pocket parks: Lake View Park, Semillon and Forest View tot lots. These are small, passive park areas with playgrounds in them for children. Active recreational activities are not scheduled in these parks nor are rest room facilities maintained by Park maintenance funds.
- Neighborhood parks: Cypress Canyon Park, Jerabek Park, and Spring Canyon Park. These are smaller parks designed to provide recreational space to the local neighborhoods. Most of these parks, at least in Scripps Ranch, are in the 10-12 acre gross size with at least 5-8 acres of active, recreational space that supports sports such as soccer, baseball, softball and basketball.
- Community Parks: Scripps Ranch Community Park, Black Mountain Community Park, and Houghlass Community Park. These are larger, community-based recreational facilities usually over 25 acres in size which offer lighted outdoor recreational facilities and recreational centers (gyms). Scripps Ranch Community Park is the smallest of these facilities.
- Regional Parks: Balboa Park, Mission Bay Park, and Mission Trails Park. These are very large park lands that offer a wide variety of specialized recreational facilities to the whole City.

RESPONSE

224 The details of the school and park site design would be developed in coordination with the City of San Diego's Parks Division and the Poway Unified School District. Such details are not necessary to evaluate the potential environmental impacts of the proposed project. For purposes of the EIR, public park adequacy is based on net acreage, not design.

225 Impacts to public parks are evaluated in EIR Section 4.11. This comment regarding private recreational facilities does not address the adequacy or completeness of the EIR. Suggested revisions to the Precise Plan are noted. Also see response number 137.

226 This comment regarding drains in the park site does not address the adequacy of the draft EIR in evaluating project impacts.

227 The EIR evaluates the project as proposed. Suggested revisions to the Precise Plan are noted. When determining park acreage requirements, the City of San Diego conforms to the standards set forth in its Progress Guide and General Plan of providing 2.4 acres of net usable park area for every 1,000 population residing in a community. This acreage requirement encompasses both neighborhood and community park requirements. The General Plan also provides for a "five-acre credit" for neighborhood parks located contiguous to an elementary school. Based on the proposed 941 dwelling units in Rancho Encantada, a projected population of 3,354 is anticipated. This translates to a park acreage requirement of approximately 8.05 acres (3.05 acres after taking the "five-acre credit" for the proposed elementary school site into account). The Precise Plan for Rancho Encantada proposes a 4.0 net-acre park site. As part of this park acreage requirement, provisions for a restroom facility, play equipment, and turf-ed play areas can be accommodated.

LETTER OF COMMENT

RESPONSE

Park usage in the City of San Diego is increasing yearly. This is especially true in the Northern Park Division area. Both the types of sports being played and the length of the sports seasons for both youth and adult recreation are increasing. This has resulted in a serious over-usage in Scripps Ranch as well as other communities. This condition forces many leagues to limit participation as well as forcing the Scripps Ranch Recreation Council into the position of limiting recreational usage requests from the residents of the community as we struggle to balance usage and maintenance of park facilities. This condition will only get worse as homes are still being constructed in Scripps Ranch and all of our parks are already on-line. Scripps Ranch will accommodate its residents, but will be unable to provide recreational space for communities outside of Scripps Ranch.

227

Therefore, it is imperative that Rancho Encantada and the FUA be planned such that it can fully provide all of its recreational needs. This means not only its local recreational needs, mini-parks and neighborhood parks, but also plan to provide what would be considered community-based recreational requirements, lighted adult facilities for outdoor recreation and some form of indoor recreation facility, i.e. gym.

Currently, the City's comments indicate that there should be at least 8 acres of active recreational space in Rancho Encantada. This space can be either a park or a combination of park acreage and jointly used school playground. From a recreational activity perspective, 8 acres of active play area should meet the needs of the 1000 homes planned for Rancho Encantada. However, based on recreational usage in the surrounding communities, it is clear that acreage alone is not a sufficient criteria for insuring that Rancho Encantada can meet all its recreational needs. To insure that the recreational needs are met, the following list of recreational facilities is provided as the minimum acceptable to insure that Rancho Encantada can meet the needs of its residents:

228

- Sufficient turf to provide at least two full-sized soccer fields, 330 yards by 65 yards, each with adequate separation.
- Four adult-sized softball infields
- At least one full-sized basketball court
- One-two tennis courts
- Restroom facility
- Lighting for at least one soccer field and two softball fields
- Playground(s) with facilities for different age groups
- Shade structures in and around the park areas, and
- Indoor recreational space, i.e. mini-gym as seen in several Poway elementary schools.

The spread-out nature of Rancho Encantada would indicate the need for at least one pocket park in the Montecito area, although several of these small areas with playground equipment geared toward preschool to early elementary school-aged children would greatly enhance the recreational aspects of the community. In Scripps Ranch, we have found these small play areas offer the small children opportunities for play where they are not competing for space from the larger children or the organized recreational activities.

228

The EIR evaluates the project as proposed and concludes that public park impacts would be mitigated to below a level of significance. Suggested revisions to the project's recreational facilities are noted. See response number 227.

The Scripps Ranch Recreation Council would urge the City to consider locating and developing a regional park somewhere in the Northern City area. It may be that the FUA would offer this opportunity. A park similar to Kit Carson Park in Escondido is seriously needed to not only provide increased facilities for "classical" recreational needs, but could also provide space and facilities for the various forms of alternative recreation that have become so popular." 229

Libraries: The EIR did not analyze potential impacts on the existing Scripps Ranch Library parking lot. 230

Public Safety Impact Analysis, Sec. 4.12

Electromagnetic Fields:

The EIR states that "because the possible link between electromagnetic fields from power lines and deleterious health effects has not been established, no land use setback distances from power lines or easements has been recommended..." However, when the McMillin Company rezoned the land north of Scripps Poway Parkway in 1995 to construct approximately 500 homes, a setback from the overhead power lines was established (the same power lines that cross the Rancho Encantada development). It is not clear what new information has been made available negates the public health concern over deleterious health effects associated with locating homes near power lines in the past six years. Recognizing the fact that the California State Department of Education requires a 150 ft setback from 230kV transmission lines, it would be logical to expect a similar setback of homes to protect residents from the associated electromagnetic fields (EMF's). The draft EIR should be so amended. 231

No analysis of the existing Doppler Radar station (located on the Miramar Air Station) impact on the proposed residential areas has been provided. 232

Electricity/Power Consumption (ref. Sec. 4.12, Public Safety Related to Electricity)

Although the draft EIR addresses environmental impacts of the electric lines for the project from a public safety standpoint, the draft EIR fails to discuss measures to assure that the new project would not cause Stage III electric shortage emergencies and rolling brownouts. In the current market of power availability in California and San Diego County, this project could affect power availability for neighboring communities. The draft EIR should be amended to add a section assessing energy resources, and the impacts of this project on the energy resources and availability. 233

Alternatives, Chapter 9

229 The comment is noted. Development of a regional park within the FUA is beyond the scope of the proposed project.

230 EIR Section 4.11 concludes that the proposed Project would not result in a significant impact to library service because the Scripps Ranch library is within a two-mile radius of the proposed project site and is adequate to serve the projected population. The availability of parking facilities at the library is beyond the scope of the proposed project.

231 No revisions are necessary to the EIR. As stated in EIR Section 4.12, the existing scientific data regarding EMF are inconclusive and potential impacts are speculative in nature. In accordance with State CEQA Guidelines, the known information about EMF is summarized in the EIR and no conclusion regarding significance is reached.

232 The National Weather Service maintains a WSR-88D weather surveillance radar on the MCAS Miramar property. The radar has been in operation since 1995 and is located at an elevation of approximately 945 feet above mean sea level, approximately 1,000 feet south of the Rancho Encantada project boundary. The WSR-88D measures the speed, the direction of motion, and intensity of approaching weather through doplar technology and provides advance warning time for weather events such as thunderstorms. Commonly used microwave exposure guidelines and standards are adopted by several organizations, including the American National Standards Institute (ANSI), the Institute of Electrical and Electronic Engineers (IEEE), the International Radiation Protection Association (IRPA) and the Occupational Safety and Health Administration (OSHA). Energy transmitted by the WSR-88D is well below the energy levels permitted by these standards. In fact, the WSR-88D energy levels are approximately 10,000 times less than a cellular telephone (National Weather Service, March 22, 2001). No significant adverse health or safety impacts exist on the proposed project site or would occur to future project residents due to existence of the WSR-88D radar.

233 Energy shortages occur on regional, not local, levels. As such, implementation of the proposed project would result in a negligible effect on the availability of energy resources.

P. 9-1, fourth paragraph The Alternatives Analysis section of the draft EIR assumes that all other project alternatives should be assessed as though old City development regulations would apply. There is no explanation provided for the reason for this analysis assumption. In fact, this paragraph goes on to state that any new development proposal would be subject to the City's new regulations. This analysis assumption appears to be made without merit. All of the alternatives analyzed in this section should therefore be revised to instead assume the City's new regulations. This should be done through a revised draft EIR, subject to new public distribution and review.

234

Pp. 9-1 & 9-2, Section 9.1.1, Phase Shift Alternative: This section, presenting an alternative "considered but rejected," presents a phase-shift alternative as one where "the land use plan would designate more intense use of the land than that proposed by the Project . . . it is also likely that more land area would be disturbed under the Phase Shift Alternative as compared to the proposed Project and that the MHPA would not be expanded . . ." [emphasis added] For this reason, the draft EIR rejects and does not analyze a phase shift alternative.

235

There is no justification for these assumptions in the record. The proposed projects intensity and urban-level of development is substantially beyond the level of land use described and intended without a phase shift in Council Policy 600-29.) The draft EIR should be revised to include consideration of a phase shift alternative.

P. 9-3, Section 9.1.3, Alternative Sites: The number of dwelling units and other land development proposed by the current project can easily be achieved by land of substantially smaller size. It is unnecessary that alternate project sites be 2,600 acres in area, and alternative site consideration should not be so limited. Further, simply because the current project applicants "do not [currently] own any other parcels of land in the proximity of the project site," [which is also not supported by any evidence in the record], is no reason to not consider alternative sites.

236

PP. 9-4 - 9-12, Section 9.2, No Project Existing Zoning Alternative: This section presents an alternative where full site development would happen under current zoning designations (suburban residential and industrial). CEQA Guidelines Sec. 15126.6(e) defines the CEQA no-project alternative. Subsection (e)(2) says "the 'no project' analysis shall discuss the existing conditions [of the site] at the time the notice of preparation is published, or . . . at the time environmental analysis is commenced, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services." The current draft EIR does not present existing site conditions (mostly non-developed) as part of its no-project presentation. This development scenario (p. 9-7, second paragraph) "would result in land use conflicts with Council Policy 600-29/Proposition A associated with the development of manufacturing uses. . ." The level of land use outlined here would likely require a phase shift, and therefore does not qualify as land use consistent with current plans. Infrastructure is missing to support the level of industrial use outlined in this section. This alternative is not reasonable or feasible.

237

234 The proposed project was filed and has been analyzed under the provisions of the City of San Diego Municipal Code in effect prior to January 1, 2000. If one of the alternatives discussed in EIR Section 9.0 is selected by the decision maker, it would be approved under the auspices of the original application and would be subject to the same provisions as the proposed project. If a new application were to be filed in order to implement one of the alternatives, the provisions of the Land Development Code and Environmentally Sensitive Lands (ESL) ordinance would apply.

235 See response number 117. According to a City of San Diego Planning Report dated February 22, 1990, Report Number 90-052, pgs. 5 and 6, the Sycamore Estates site could be intensively developed with industrial uses as a matter of right under present zoning, notwithstanding its Future Urbanizing designation.

236 CEQA does not require that analysis of alternative sites always be included in an EIR. However, if all the surrounding circumstances make it reasonable to consider an alternative site, then this alternative should be considered and analyzed in the EIR. CEQA Guidelines Section §15126.6(f) states that "the range of alternatives required in an EIR is governed by a 'rule of reason' that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice." In making the decision to include or exclude analysis of an alternative site, the key question and first step in analysis is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Only locations that would avoid or substantially lessen any of the significant effects of the project need to be considered for inclusion in the EIR.

A review of road maps and aerial photographs of property within the general project vicinity were examined in an attempt to identify sites that were undeveloped and available for private development. A 2,600-acre site was not a limiting criteria for the evaluation of sites to be considered. No alternative sites were considered reasonable alternatives under the provisions of CEQA.

237 As stated in the State CEQA Guidelines, an EIR shall analyze the impacts of the no project alternative by projecting what would reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services. If the proposed Rancho Encantada project is not approved by the City of San Diego, the site could be developed in accordance with existing zoning, taking into consideration existing utility easements, the City's MHPA and Council Policy 600-29. Figure 2-8, Existing Zoning, in Chapter 2.0, ENVIRONMENTAL SETTING, provides an illustration of the project site's existing zoning. Necessary discretionary actions could include Planned Development Permits (PDPs) for each of the sub-projects, and tentative subdivision map applications and Resource Protection Ordinance (RPO) permits would be required. A Precise Plan or other long-range plan would not be considered under the no project alternative. The existing physical conditions of the site under this alternative are the same as indicated in Section 2.0 of the final EIR.

P 9-6. The level of traffic impact outlined for this alternative on pp. 9-9 and 9-10, and presented as a contrast to the proposed project, is not logical given the existing topographic site constraints and lack of adequate infrastructure 238

Pp. 9-13 - 9-20, Section 9.3, No Project Mineral Resource Extraction Alternative. No existing site conditions are presented as part of this no-project presentation. An intensive and extensive aggregate mining and processing operation as outlined is inconsistent with current regulatory limitations under the FUA. This alternative is not reasonable or feasible and should be removed from the draft EIR. A revised draft should be recirculated for public review 239

P 9-21, Sec. 9.4.1, Description of the Reduced Project Alternative: This alternative includes the siting of an elementary school, which is not required by the Poway Unified School District, and is not required to reach necessary project objectives. Given the reduction of dwelling units in this alternative, inclusion of the school would actually increase traffic because the Rancho Encantada development would no longer generate over 50% of the students who would attend the school. The school should be eliminated from this alternative for impact reduction. 240

Pp. 9-27 and 9-28, Sec. 9.5.1, Description of the Reduced Grading Alternative. It is not clear why "it is assumed that several access points would be established with Beeler Canyon Road." And the EIR states, "it is assumed that 50 % of the lot area would be disturbed by grading and construction." The 50% impact assumption has been chosen as a worst case scenario, however, based on topographic constraints it is likely that 35-30% of each lot would be impacted. This project alternative should be revised and grading impacts re-assessed, for example, at an average 35% grading impact level. 241

P. 9-30, Sec. 9.5.2, Reduced Grading Alternative land use impact assessment. It is stated that each project would be subject to the RPO. However, it is more likely that any new project submittal would be subject to the new ESL regulations. The impact analysis should take this into account. It is also stated, "depending on the placement of each home on each lot, potentially significant impacts could occur to wetlands and steep slopes in excess of the RPO encroachment allowances." This alternative should identify and prohibit such encroachments. It is stated that "from a land use standpoint, [this] Alternative would not be preferable to the proposed Project because homes would not be clustered." As described, this alternative will reduce impacts below the level of the proposed project. If this alternative reduces impacts more than the proposed project, then the proposed project's level of clustering would not be preferred. This incorrect assessment should be removed from the draft EIR. The alternative should be revised. 242

Pp. 9-34 through 9-40, RPO Consistent Alternative: It is stated that each project would be subject to the RPO. However, it is more likely that any new project submittal would be subject to the new ESL regulations. The impact analysis should take this into account. 243

A new project alternative should be developed which reduces impacts more than any other. In the current draft EIR, three alternatives are found to be environmentally superior to the proposed project: the "reduced project alternative," the "reduced grading alternative," and the "RPO 244

238 The traffic generation presented for the No Project-Existing Zoning Alternative is accurate as stated in the EIR. The number of trips generated is calculated based on the number of dwelling units and the manufacturing and industrial acreage that would occur under the alternative. The Sycamore Estates sub-project site would be graded in such a manner that topography would not preclude the development of manufacturing/industrial uses. To accommodate the increase in traffic, Beeler Canyon Road would be improved to an Industrial Collector.

239 The No Project-Mineral Resources Alternative is included in the Draft EIR to present an alternative for avoiding the proposed Project's cumulative impact to aggregate resources. As stated in the State CEQA Guidelines, "the discussion of alternatives shall focus on alternatives to the project which are capable of avoiding or substantially lessening any significant effects of the project. . . ." "No Project" does not mean no development. State CEQA Guidelines clarify that if disapproval of the project under consideration would result in predictable actions by others, such as the proposal of some other project, this 'no project' consequence should be discussed. The Mineral Resources Alternative depicts such a potential consequence. Council Policy 600-29 (Maintenance of the Future Urbanizing Area as an Urban Reserve) sets forth four development options for the FUA, one of which allows development pursuant to a Conditional Use Permit (CUP), provided that the conditional uses are natural resource-dependant, non-urban in character, or of an interim nature which would not result in an irrevocable commitment of the land precluding future uses. The No Project-Mineral Resources Alternative could be permitted in the FUA under that option.

240 The provision of a school site is an objective of the proposed project; thus, the provision of a school site in the Reduced Project Alternative allows the Alternative to meet this project objective. As stated in State CEQA Guidelines, alternatives should feasibly attain most of the basic objectives of the project. Also see response number 220.

241 Under the Reduced Grading Alternative, residential lots would be constructed under a custom-lot program. A 50% impact assumption represents a worst-case scenario. It is recognized, however, that a smaller impact area could occur. Multiple access points to Beeler Canyon Road would be necessary to avoid substantial grading associated with the construction of a main roadway.

LETTER OF COMMENT

RESPONSE

- 242 It is likely under this alternative that a new development application would be filed with the City, rather than a modification to the existing development applications. In that case, the Reduced Grading Alternative would be subject to ESL instead of RPO. The intent of this alternative is to reduce the proposed project's significant impacts to landform and grading through a custom-lot program, but it is not possible at this level of analysis to develop a detailed grading plan for each lot. It can only be assumed based on the site topography and location of wetlands, that the grading of some lots could impact wetlands and/or steep slopes in excess of that permitted under the City's ESL if it could be adequately demonstrated to the City that impacts to the steep slopes and/or wetlands could not be avoided. Even though this alternative reduces impacts to biological resources as compared to the proposed project, the custom lot program would fragment open space areas, and therefore, be less preferable from a biological standpoint. In accordance with State CEQA Guidelines, the Reduced Grading Alternative contains sufficient information to allow meaningful evaluation, analysis and comparison with the proposed project.
- 243 See response number 234. It is likely that under the RPO Consistent Alternative, a modification to the existing development applications would occur. In that case, this alternative would be subject to the same provisions as the proposed project, including RPO.
- 244 The EIR has evaluated a reasonable range of alternatives as required by CEQA. The decision-making body may, if it wishes, approve a project that contains components of the project alternatives. Therefore, no additional public review is needed.

LETTER OF COMMENT

January 3, 2001

TO: City of San Diego
Planning Department

RE: EIR/LDR99-1094 / SCL2000011053 - Sycamore Estates - MacMillan Builders

I have been living at 14710 Beeler Canyon Rd. (shown on accompanying topog map as BCC) for the last 20 months. I have spent extensive time hiking thru out this entire region and becoming familiar with some of the plants and trees and many of the wildlife. From my living space I am able to watch the birds and animals that live, hunt, and travel across the most Westerly hill of the proposed Sycamore Estates (shown on topo as MSE). This report addresses solely this portion of the proposed development. I have marked the wildlife activity on the surrounding hillsides, slopes, and creek-bed. Any building on this hilltop (MSE) would do irreparable damage to the existing ecosystem of the entire area. Several major wildlife corridors converge in the canyon below the above-mentioned hill.

245

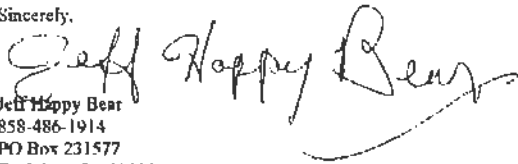
The EIR Reduced Project Alternative that doesn't call for development on this most westerly hilltop would do the most to maintain the integrity of this most precious and needed wildlife habitat region.

246

247

It is my sincere prayer that when you make your decision you remember we share this planet and it is our responsibility to leave a place for our four legged, finned, and winged friends to live, hunt, and play.

Sincerely,



Jeff Happy Bear
858-486-1914
PO Box 231577
Encinitas, CA 92023

This was previously typed to 619-446-5499 on Friday Jan 5th.

RESPONSE

245 Comments are noted.

246 Comment is noted. The species identified by the commentor were either already known to occur on-site, or their presence does not change the analysis or findings of the EIR. See response numbers 57 and 58 for a discussion of wildlife corridor issues.

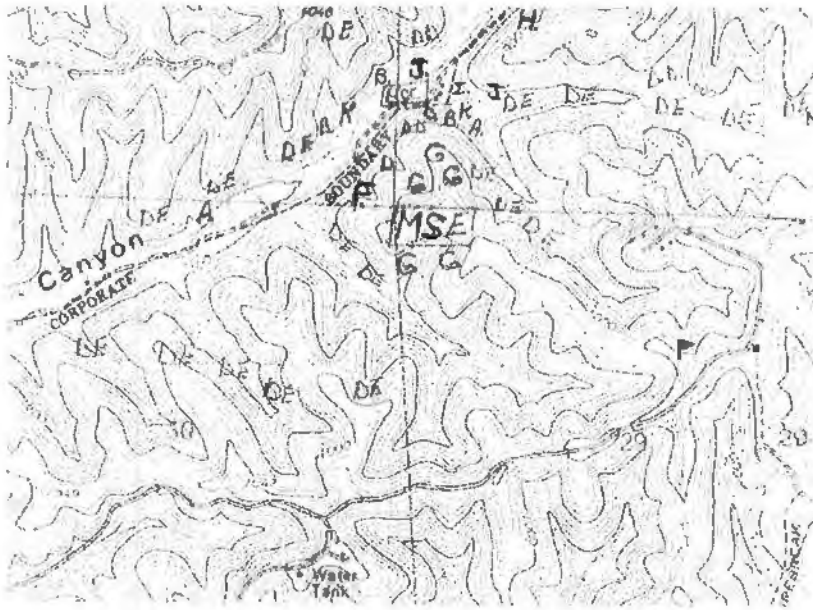
247 Comment is noted.

LETTER OF COMMENT

RESPONSE

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RE: TRM 11241-1 - Sycamore Estates - MacMillan Builders
 Comments by Jeff Happy Bear
 See accompanying page for map legend

11/22/01 1:56 P

RE: EIR#LDR99-1094 / SCT#2000011053 - Sycamore Estates - MacMillan Builders
Comments by Jeff Happy Bear

WILDLIFE HABITAT
Within study Area
As listed on accompanying Topo Map

- A. Coyote dens
- B. Marsh Hawk nests (year-round)
- C. Falcon nest (Spring & Summer for 2 years)
- D. Deer roosting and sleeping spots
- DE. Deer runs
- F. Great Horn Owl nest (one fledgling last year)
- G. Black Shoulder Kites hunting area (nest close but unknown)
- H. Red Tail Hawk nest (hunt the entire region)
- I. Barn Owl nest
- J. ~~Red~~ Roadrunner nests
- K. Rattle-snake dens (large)

248

Also home to the many additional common species such as rabbits, squirrels, many birds, etc.

Other Visitors to the Area include:

- Bobcat
- Mountain Lion
- Skunk
- Red Shouldered Hawks
- Kestrels
- Raccoon
- Turkey Vultures
- Golden Eagles

248

See response number 246.

LETTER OF COMMENT

RESPONSE

Communication Endeavors, Inc.

PO Box 231402
Encinitas, CA 92023
858-831-1771

January 3, 2001

TO: City of San Diego
Planning Dept.

RE: EIR #LAR99-1094 / SCH2000011053 - Sycamore Estates - MacMillan Builders

The situation: The building of a tract of homes on the crest of a hill that overlooks a very valuable, active wildlife corridor. 249

The problem: Any building right on the edge of hill tremendously impacts anything downhill from it. 250

1. Run-off of rain, people washing their cars, wind blowing pieces of trash, etc. all carry many automotive and human pollutants downhill. 251
2. Grading the crest so as to push dirt onto the incline to increase the flat surface area at the top damages the hillside itself. 252
3. Most larger animals, other than coyote, are very sensitive to the presence of humans. The sight and noise of homes at the top of the hill does change many animals' movements 253

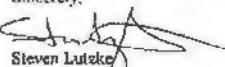
Personal Testimony: I have been a frequent camper in this area over a two year period and have seen many wildlife in this area. It is a very active and rich wildlife and plant-life area. Every night I have camped I have heard owls back in the area under consideration and am quite certain they nest there. Please see item A on accompanying topo map. 254

I have recently walked the area in question and with binoculars have seen animal den holes only fifteen to twenty feet below the crest of the hillside in question. I will be happy to take the time to show this to any official. Excavation and building will absolutely negatively affect this den and many others. Please see item B on accompanying topo map. 255

Organization Concern: Our 501(c)(3) nonprofit organization is chartered to use the media to promote positive solutions to society. In this matter there is not time and probably no need to involve the media however the positive solution is clear and obvious. 256

The Solution: Fortunately the solution is already contained within this EIR itself. The "Reduced Project Alternative" would be an acceptable compromise already laid out. I salute the foresight of the authors of this EIR to have included this option which serves everyone involved. 257

I ask the decision-makers in this matter to uphold the true spirit of maintaining a viable wildlife corridor and habitat by protecting this valuable hilltop and the canyon below. At this moment it may seem minor. In just a few short years, with the massive development that is sure to come to this area, this decision looms large for our future generations.

Sincerely,

Steven Lutsko
President

*This was previously faxed to
619-446-5499 on Friday Jan. 5th.*

249 Refer to response number 57 for a discussion of regional wildlife corridors.

250 EIR Section 4.5, HYDROLOGY/WATER QUALITY, includes an analysis of downstream water quality effects. EIR Section 4.3, BIOLOGICAL RESOURCES, includes an analysis of potential indirect impacts on biological resources.

251 As disclosed in EIR Section 4.2, LANDFORM/VISUAL QUALITY, the proposed project would have a significant direct and cumulative and unmitigated impact on landform.

252 See response numbers 57 and 58 for a discussion of edge effects and wildlife corridor issues.

253 Comment is noted.

254 Comment is noted.

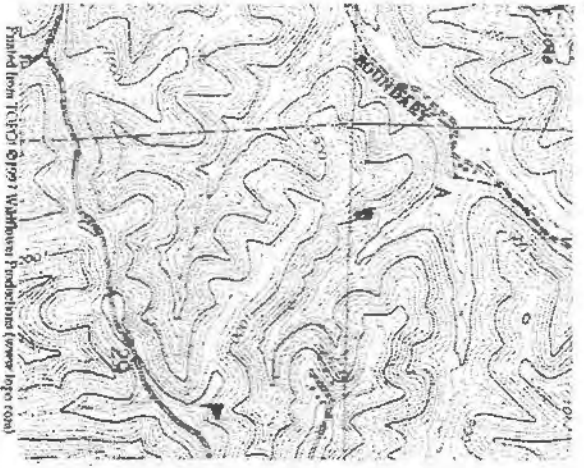
255 Comment is noted.

256 Comment is noted.

257 Comment is noted.

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http://mail.cowl.org/mail/attachment?attach_id=1814&part



Printed from TCHD's 2007 Watershed Productions (lower left cont)

RE: EIR # 2007-0054 - Skyway Estates - MacMillan Builders
 Comments by Communication Endeavors President Steven Lippke
 Page 2

1 of 4

10/26/07 11:52 AM

Ecological Ventures California, Inc.

619-473-9669 (Office)
619-473-9709 (Fax)
email: ceovenurec@aol.com

P.O. Box 69
Pine Valley, California 91962
www.ecologicalventures.com

January 4, 2001

Lawrence C. Monserrate, Environmental Review Manager
Planning and Development Review Department
CITY OF SAN DIEGO
1222 First Avenue, Fifth Floor
San Diego, California 92101

RE: Rancho Encantada Precise Plan, Draft EIR Dated November 22, 2000
C.D.R. No. 99-1094, SC# No. 2000011053

Dear Mr. Monserrate:

Ecological Ventures California, Inc. has been engaged by the Beeler Creek Conservancy to review and comment upon the City of San Diego's Rancho Encantada Draft Environmental Impact Report (DEIR). Ecological Ventures California, Inc. is an environmental and biological consulting firm with over 30 years of combined experience in both the public and private sectors of planning and wildlife ecology.

Our review has found that the information contained within the DEIR is incomplete and inadequate in at least the following sections: 4.3 Biological Resources, 4.5 Hydrology/Water Quality, and 9.0 Alternatives.

More specifically, and pursuant to the California Environmental Quality Act (CEQA) and case law precedents, the DEIR is deficient in the following areas:

- 1. Releasing of the DEIR during the holiday season is counter-productive to CEQA under Section 15201, in which the "...public agency should include provisions in its CEQA procedures for wide public involvement, formal and informal, consistent with its existing activities and procedures, in order to receive and evaluate public reactions to environmental issues related to the agency's activities." (Emphasis added). 258
- 2. Pursuant to Section 15206 of CEQA, this project meets the criteria of a project with Statewide, Regional, or Area-wide significance and as such should be included in the DEIR. 259
- 3. The Environmental Analysis for Sections 4.3 Biological Resources and 4.5 Hydrology/Water Quality are inadequate for the following reasons (*San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus* (5th Dist. 1994) 27 Cal.App.4th 713, 722-729 (32 Cal. Rptr. 2d 704)):

258 The EIR was released for a 45-day public review period on November 22, 2000. The release was not intentionally planned to coincide with the holiday season. The City of San Diego Environmental Analysis Section (EAS) processes hundreds of environmental documents each year, and is responsible for doing so in a timely manner. Each environmental document is released for public review as soon as it is completed and determined to be adequate by EAS. The close of the public review period was originally January 5, 2001; however, the City extended this deadline to January 19, 2001.

259 A statement has been added to EIR Section 1.0 disclosing that the proposed project meets the criteria of a project with statewide, regional or area-wide significance in accordance with State CEQA Guidelines. In meeting this criteria, the lead agency submitted the Draft EIR to the State Clearinghouse and to the appropriate metropolitan council of governments (SANDAG) for review and comment and coordination with transportation planning agencies was conducted.

Mr. Monserate

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January 4, 2001

- a. Not enough biological information is presented regarding current use of the project site by large and small mammals such as mule deer, bobcat, and coyote. No data has been presented that identifies whether or not the project site and adjacent wildlife corridors are being utilized and whether or not the project site has any relationship to these corridors or regional significance to these corridors. This information is vital in relationship to the usage of the both Beeler Canyon Regional Wildlife Corridor and Sycamore Canyon. These mammals may be using north/south trending canyons and draws to access Beeler Canyon and Sycamore Canyon. This type of information is necessary in planning through routes for these animals within the proposed development, rather than assuming that they will just "go around it." If access corridors are being utilized within the proposed project site then more careful planning of roads, lighting, vegetative cover, and safety for these animals must be built into the project for their continued survival and protection (see highlighted excerpt from The Forest News). For example, draws and canyons should be bridged, not filled. Please refer to the corridor study conducted for the construction of Highway 52. It is interesting to note that no discussion of large mammals was presented for the project site or for the off-site east/west wildlife corridors. Therefore, it is highly recommended that a study be developed to determine current wildlife usage on and adjacent to the project site and potential impacts from development and human intrusions.
- b. There is absolutely no discussion of the arroyo southwestern toad (*Bufo microscaphus californicus*) which is listed as endangered by both the U.S. Fish and Wildlife Service and the California Department of Fish and Game. If surveys were not conducted, why? Have they been observed or surveyed for in the past? Beeler Creek has a sufficient seasonal flow of water that could potentially support the arroyo toad. We have found the arroyo toad in drainages that were previously assumed to not have supported them. In addition, it should be noted that arroyo toads have been known to migrate into upland habitats out to one kilometer from their spring and summer stream/riverine habitats (Tim Burr, Camp Pendleton MCB, pers.comm.). It is highly recommended that a study be developed to determine the presence/absence of the arroyo toad both on the project site and adjacent to it.
- c. Information pertaining to water quality, storm water run off, and residential and industrial generated run-off into Beeler Canyon is inadequate. More specifically, there is not enough information pertaining to the detention/sedimentation/siltation/infiltration basins themselves. Even with protective measures in place, these controls will not stop the leaching of pollutants into the ground water. In addition, pollutants will also affect surface water quality for wildlife and plants. Additional information regarding the basins should include: the size of the basins, the holding capacity of the basins, the dissipation and evaporation rates projected within

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Beeler Canyon and Sycamore Canyon have been identified as regional wildlife corridors in the MSCP. These two canyons are the primary wildlife movement corridors in the region. Wildlife also currently use the areas proposed for development for cover, foraging and movement to other areas of natural habitat. The purpose of the MSCP is to identify the key corridors and linkage areas in a region, and insure good connectivity through these corridors to larger blocks of habitat. The project, as designed, provides connectivity through Beeler Canyon, and provides north-south movement throughout the eastern half of the Sycamore Estates project. Additional studies are not warranted because wildlife movement is adequately addressed in the EIR and through the MSCP.

261

See response number 74.

262

The detailed information requested would not be available until final project design and is not required for the EIR to adequately assess the project's environmental impacts to water quality. The EIR follows the appropriate procedure by describing the permanent post-construction water quality protection measures required of the project and shown on the proposed Tentative Maps. Tentative Map approval conditions are included that would require discretionary approvals be conditional upon the detailing and analysis necessary at final project design, prior to permitting. Detailed analysis is premature until that final design detailing and analysis has been performed. The intent of the permanent post-construction water quality measures included in the project is to treat the stormwater runoff for the pollutants of concern to the maximum extent practical before it is discharged from the project site. This basic requirement has its genesis in the federal Clean Water Act and the National Pollutant Discharge Elimination System (NPDES) as administered by the federal Environmental Protection Agency through the State of California's General Permit for Construction Activities administered by the State and Regional Water Resources Control Boards.

LETTER OF COMMENT

Mr. Monserrate

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January 4, 2001

the basins, maintenance and management of the basins (will they be cleaned out periodically and by whom?), what types of pollutants are expected within the basins (typical and atypical), and what measures are in place for overflow or large storm events. Please address the option of putting the storm water and residential use run off into the sewer system rather than into basins which will eventually flow into the Penasquitos Lagoon.

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4. Because the DEIR lacks sufficient information regarding wildlife corridor usage, endangered arroyo southwestern toads, and water quality, and that the document has failed to adequately provide mitigation for these issues (to less than significant), the DEIR will need to address those components as stated above in item 3, as well as those deficiencies discussed later on this letter (*Concerned Citizens of South Central L.A. v. Los Angeles Unified School District* (2d Dist. 1994) 24 Cal.App.4th 826, 840-843 [29 Cal.Rptr.2d 492]). In *Sierra Club v. State Board of Forestry* (1994) 7 Cal.4th 1215, 1236 [32 Cal.Rptr.2d 19] and pursuant to Public Resources Code Section 21160, in which that statute authorizes agencies to require the applicants for certain kinds of projects to "submit data and information which may be necessary to enable the public agency to determine whether the proposed project may have a significant effect on the environment or to prepare an environmental impact report."

264

5. Regarding Alternatives, Section 15126, subdivision (d)(2) of CEQA, requires the lead agency, within the EIR, to "identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process" and to "briefly explain the reasons underlying the lead agency's determination." In addition, Section 15126, subdivision (d) of CEQA, also states that the "range of reasonable alternatives" to be included in an EIR must consist of alternatives that "would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project." Also discussed under this Section is "feasibility," as it pertains to the selection of alternatives for inclusion in an EIR. Factors include jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site(s). How might this pertain to widening of Beeler Canyon Road which is within the jurisdiction of the City of Poway and the projected decline of water quality within the Penasquitos Lagoon?

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If this is the intent of CEQA, then why do some of the alternatives propose greater environmental impacts than the proposed project would, given that these alternatives may occur in the foreseeable future if the proposed project were not approved. Some of the better components of these alternatives could be combined or mixed and matched to create the most environmentally sensitive

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RESPONSE

263 One of the primary efforts under the Clean Water Act is to separate stormwater systems from sanitary sewer systems and eliminate combined systems. Putting storm water into the sanitary sewer system would be inconsistent with water quality goals. In addition, such an action may ultimately result in flows in excess of the sewer treatment plant's capacity.

264 See response numbers 57, 74, 149 and 262. Significant impacts to biological resources would be mitigated to below a level of significance. As discussed in response numbers 149 and 262, although direct impacts to water quality would be mitigated to below a level of significance, no feasible measures would be available at the project level to mitigate cumulative water quality impacts to below a level of significance. The commentator cites *Concerned Citizens of South Central L.A. v. Los Angeles Unified School District* (1994) 24 Cal.App.4th 826, 840-843, *Sierra Club v. State Board of Forestry* (1994) 7 Cal.4th 1215, 1236 and Public Resources Code section 21160. In *Concerned Citizens*, the court stressed that the "rule of reason" under CEQA requires the lead agency to analyze only feasible means of reducing significant environmental impacts, not every imaginable project alternative or mitigation measure. In compliance with CEQA, the Rancho Encantada EIR analyzes a reasonable range of project alternatives and mitigation measures to address significant environmental impacts of the project. In particular, Section 4.5 of the EIR discusses the feasible mitigation measures associated with water quality impacts. Public Resources Code section 21160 authorizes a public agency to request information needed to identify the significant environmental impacts of a project. The City has requested and received such information from the applicant.

265 Section 9.1.3 of the EIR does explain that alternative sites for the project were evaluated and that no alternative sites were considered reasonable alternatives. Other than pavement and utility improvements within the existing right-of-way, improvements to Beeler Canyon Road are not proposed by the project. Because no significant impacts would occur with respect to Beeler Canyon Road, no analysis of alternatives is required in that regard under State CEQA Guidelines. Using Beeler Canyon Road as a primary access road would result in new, significant direct impacts on traffic at the intersection of Creek Road/Pomeroado Road, as analyzed under the No Project - Existing Zoning Alternative and the Reduced Project Alternative. In addition, the EIR analyzes the impact of project alternatives on water quality within the Penasquitos Lagoon. The cumulative water quality impacts would remain significant and unmitigable under all of the project alternatives analyzed in the EIR.

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The State CEQA Guidelines state that the No Project Alternative should discuss what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services. Both the No Project - Existing Zoning Alternative and the No Project - Resource Extraction Alternative represent development that could occur on the site under existing zoning. The commentor is correct in noting that greater environmental impacts would occur under these alternatives. According to a City of San Diego Planning Report dated February 22, 1990, Report Number 90-052, pgs. 5 and 6, the Sycamore Estates site could be intensively developed with industrial uses as a matter of right under present zoning, notwithstanding its Future Urbanizing designation. As explained in response number 264, the "rule of reason" under CEQA requires the lead agency to analyze only feasible means of reducing significant environmental impacts, not every imaginable project alternative or mitigation measure.

Mr. Monserrate

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January 4, 2001

alternative, and not show the public that all other alternatives are worse than the project and therefore the project itself (or the alternative closest in resemblance to the project) looks to be the best option for the site. This is contrary to CEQA.

266

In addition, one alternative was clearly left off of this list. One such alternative should discuss a No Project Alternative simply addressing the current and existing land use with no project or zoning ties, since even those projects may be rejected due to environmental constraints. In *Environmental Planning and Information Council v. County of El Dorado* (3d Dist. 1982) 131 Cal.App.3d 350 [182 Cal.Rptr. 317], a proper "no project" alternative must look at both existing conditions and a future build-out scenario (i.e., what would likely eventually occur on-site if a proposed project application is denied).

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The following is a breakdown of each alternative and associated impacts as found within the DEIR:

268

- a. No Project - Existing Zoning Alternative. This alternative includes industrial and residential zoning within occupied coastal California gnatcatcher habitat and potentially upland (over-wintering) habitat for the arroyo southwestern toad. This alternative would also have potential adverse effects and/or "take" of the endangered willow monardella population to the south. Water quality issues would also be significant and adverse. The concept of two bridges over the north/west canyon within the Sycamore Estates portion of the site is an excellent idea and should be utilized where there are other water flow and wildlife movement issues.
- b. No Project - Mineral Resource Extraction Alternative. This alternative proposes large scale and long-term sand and gravel mining (resource extraction) over nearly 900-acres on the Sycamore Estates project site. This alternative would decimate coastal California gnatcatcher occupied habitat and potentially upland (over-wintering) habitat for the arroyo southwestern toad. This alternative would also have potential adverse effects and/or "take" of the endangered willow monardella population to the south. The Beeler Canyon Regional Wildlife Corridor would be restricted and indirectly impacted from mining activities to the immediate south as well as directly impacted from road widening and mining truck traffic. Water quality issues and fugitive dust issues would also be significant and adverse.

267

CEQA does not require that the "no project" alternative equate to a "no development" alternative in every instance. State CEQA Guidelines clarify that if disapproval of the project under consideration would result in predictable actions by others, such as the proposal of some other project, this "no project" consequence should be discussed in certain instances. The no project alternative means 'no build' wherein the existing environmental setting is maintained. However, where failure to proceed with the project would not result in preservation of existing environmental conditions, the analysis should identify the practical result of the project's non-approval and not create and analyze a set of artificial assumptions that would be required to preserve the existing physical environment. Both the No Project - Existing Zoning Alternative and the No Project - Mineral Resources Alternative discuss the practical result of potential disapproval of the proposed project and depict site conditions that could reasonably occur upon disapproval of the project. Analysis of a "no development" alternative for the Rancho Encantada project is not required under CEQA, as it would involve the artificial assumption that existing land use controls are not applicable to the project site. The commenter cites *Environmental Planning and Information Council v. County of El Dorado* (1982) 131 Cal.App.3d 350 ("EPIC"). That case is distinguishable because it involved a general plan amendment to reduce the allowed future intensity of use in certain areas. The "no project" alternative is evaluated under a separate line of analysis for a general plan amendment (i.e., the project in EPIC) as opposed to a development project on identifiable property (i.e., the proposed Rancho Encantada project). This distinction is explained in the State CEQA Guidelines.

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Comments are noted.

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- c. Reduced Project Alternative This alternative proposes home sites along the major ingress/egress road just south of and adjacent to Beeler Canyon. These home sites would restrict the wildlife corridor and would create more immediate water quality concerns. These home sites should be eliminated or shifted south or eastward. The widening of Beeler Canyon road will also restrict the wildlife corridor. The loop road should be moved southward and out of Beeler Canyon with minimal impacts. The loop could begin and end closer to the northwest corner of the Sycamore Estates project site.
- d. Reduced Grading Alternative This alternative proposes custom lot developments. The idea of custom lot developments only break up the natural habitat even more and under this alternative pushes the lots right up to the Beeler Canyon Regional Wildlife Corridor. This will restrict the corridor and cause more immediate problems from water quality and meso-predation (predation of native wildlife from domestic/feral cats and dogs) to noise and light control issues. The alternative offers roads along all ridgelines and through canyons and draws. Is there more roadway proposed with this alternative than with the proposed project? Roads are not bridging canyons and draws and will essentially cut off any wildlife movement in a north/south fashion. Impacts to potentially upland (over-wintering) habitat for the arroyo southwestern toad would occur. This alternative would also have potential adverse effects and/or "take" of the endangered willoway monardella population to the south. The Beeler Canyon Regional Wildlife Corridor would be restricted and directly impacted from road widening and increased traffic. Water quality issues would also be significant and adverse. Larger lot sizes are more preferable than smaller lot sizes, however, environmentally destructive activities should be precluded by the landowner on these parcels (i.e. off-road vehicle use, dumping, exotic landscaping, etc.) and only certain limited and/or restricted activities allowed.
- e. R.P.O Consistent Alternative. This alternative proposes strict consistency with the City of San Diego's Resource Protection Ordinance. Although this is a less environmentally damaging alternative, the same issues regarding the arroyo southwestern toad, wildlife movement, usage, and corridors, water quality, and the widening of Beeler Canyon Road still apply as discussed previously within this letter. The bridging of the road over the canyon is a great idea and should be implemented over other canyons or draws as the necessary wildlife movement and usage information is gathered.
- f. Sewer Line. The off-site gravity sewer line is the preferred alternative. Keep the line out of Beeler Canyon.

268

269

RESPONSE

269

The commentor's preference for the off-site gravity sewer line is noted.

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We propose that the best combination of project ideas be combined into an even better and more environmentally sensitive alternative. This alternative might include the concepts of:

270

- ◆ Clustered residential units;
- ◆ Low level street lighting;
- ◆ Bridges over canyons or draws to allow for surface water flows and wildlife movement;
- ◆ A loop road that does not need to go into Beefer Canyon and impact that wildlife corridor;
- ◆ Home sites that could be built on the minimal amount of graded surface area to preserve the surrounding natural habitats;
- ◆ A storm water and residential/landscape use water quality plan where these types of waters are not allowed to enter into the regional groundwater system and thus out to Penasquitos Lagoon, but into the planned sewage system (via a storm water drain) for the project or into a water reclamation plant whereby this water could be reused for irrigation purposes and fire control;
- ◆ Speed bumps along the proposed Rancho Encantada Road to reduce or avoid the incidences of road-kills to wildlife; and
- ◆ Homeowner education about the surrounding habitats and wildlife, to include meso-predation and the likely hood of their pets being preyed upon as well; reduced back-yard lighting adjacent to open space; a safety and education class regarding open space preservation, trail use, limited passive use activities (hiking, walking, horseback riding), etc.

6. More detailed analysis of impacts is warranted within the Cumulative Impacts sections regarding wildlife corridors and usage of the project site (north/south and east/west movements) and adjacent to the project site. More detail is also warranted regarding the arroyo southwestern road, the coastal California goatcatcher, and the willow monardella.

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7. If significant effects cannot be mitigated, cannot be lessened or avoided, then a Statement of Overriding Considerations should be issued by the Lead Agency. The information in this DEIR does not show or conclude that significant impacts will be mitigated to less than significant levels.

272

8. Due to the fact that sections 4.3 Biological Resources, 4.5 Hydrology/Water Quality, and 9.0 Alternatives are deficient, it is requested that those deficiencies be corrected before the Final EIR is released and certified. Therefore, recirculation of the DEIR (or sections thereof) is warranted. This is requested pursuant to CEQA Section 15088.5, subdivision (a). In addition, subdivision (d)

273

RESPONSE

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The additional alternative concepts suggested by the commentor are noted. Some of the concepts were discussed during the design process, but were rejected for reasons of safety or code compliance. Regarding the last bulleted suggestion, homeowner education would occur as set forth in mitigation measure 4.3-16, and lighting restrictions would occur as set forth by mitigation measure 4.3-14.

271

The analysis provided is consistent with what is required for a project within the MSCP. All City survey guidelines were adhered to for the project. Also see response numbers 57, 74 and 260.

272

A Statement of Overriding Considerations (SOC) is required. The draft Findings and SOC are provided with the final EIR for consideration by the City's decision-making body during public hearings on the project.

273

Recirculation of the EIR is not warranted, as none of the conditions requiring recirculation has occurred.

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of that section provides that a decision to re-circulate an EIR must be supported by substantial evidence in the administrative record.

The following list of page numbers is specific to the DEIR and those sections that are found to be deficient and in need of more information or explanation:

Page Number	Biological Resources	Hydrology/ Water Quality	Alternatives	Other	
I				Sycamore Estates is missing 3.6-ac. Double check acreage amounts.	274
ES-9 and ES-10		X			275
ES-17		X			
ES-19 and ES-20			X		
2-7	X				
3-13 and 3-14		Off-site gravity sewer line is better option. Basins will not prevent leaching of pollutants into Beeler Canyon and ultimately in Penasquitos Lagoon			276 277
4.1-6		If drainage of toxins is to be kept off of MHPA lands, then what happens to runoff after it exits MHPA lands (i.e. into Beeler or Sycamore Canyons)?			278
4.1-29		Discuss what happens to water in basins should there be a large storm event that would exceed the capacity of the basins? How will quality of water be managed in an over flow scenario?			279
4.1-30, 4.3-12 item 4.3-14				Lighting directed away from Beeler Canyon, and open space	280

- 274 The acreage amounts listed on page I are correct.
- 275 Comment is noted.
- 276 The commentor's preference for the off-site gravity sewer line is noted.
- 277 This comment and following comments on groundwater quality appear to assume that the permanent water quality protection measures proposed by the project and addressed in the EIR are intended to protect surface waters only. The measures by regulation and design protect both surface and ground water resources. As is required for leach fields within the County of San Diego, infiltration basins would not be proposed for use in areas where fully saturated groundwater conditions occur within ten feet of the basin floor. This requirement, which has been developed by the San Diego Regional Water Quality Control Board, addresses the concern expressed in the comment.
- 278 The intent of the permanent post-construction water quality measures included in the project is to treat the project runoff for the pollutants of concern to the maximum extent practical before it is discharged from the project site to surface and groundwater resources. This basic requirement has its genesis in the federal Clean Water Act and the National Pollutant Discharge Elimination System (NPDES) as administered by the federal Environmental Protection Agency and by the State of California's General Permit for Construction Activities administered by the State and Regional Water Resources Control Boards.
- 279 The basins would be designed in accordance with adopted sizing standards of the San Diego Regional Water Quality Control Board, Order 2001-01. The water quality components of the basins would be separated from the storm water retention components of the basins and would be sized in accordance with Order 2001-01. It is common design practice for the water quality components of such basins to address flows from non-storm runoff, from more frequent runoff events and initial flows from less frequent runoff events, while larger flows from less frequent runoff events bypass the water quality components. This design treats the stormwater runoff for the pollutants of concern to the maximum extent practical before it is discharged from the project site to surface and groundwater resources. The detention/retention basins are designed to accommodate the 100-year storm.
- 280 Mitigation measure 4.3-14 would reduce potential indirect lighting impacts on biological resources to below a level of significance. This measure is consistent with the City of San Diego MSCP Subarea Plan. It is unclear why the commentor believes the measure to be deficient.

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Page Number	Biological Resources	Hydrology/ Water Quality	Alternatives	Other	
4.1-31	6-ft. high walls/fences may not be enough to preclude meso-predators from entering adjacent open space.				281
4.3-1	Inconsistency in Sect. 4.3.1 - "... developed areas are not assigned a Tier type." As opposed to "... and developed areas which are Tier IV, non-sensitive uplands." Were the eucalyptus trees evaluated for raptor use? Are these trees viable? Are they red gum and have they been infected?				282 283
4.3-6, 4.3-8, and 4.3-39	Silt fencing should also include the use of heavy black silt fence and should be trenched in to protect wetlands. Orange construction fencing does not control siltation. This should be addressed in the SWPPP.				284
4.3-10	It is highly unlikely and biologically impossible for a "road pool" to support fairy shrimp. No other vernal pools or fairy shrimp occupied pools are located within the vicinity. Reference to the "road pool" should be stricken from the text.				285

- 281 Mitigation measure 4.3-15 requires that a fencing plan be provided to the City's ERM for approval. Six foot high fences/walls are considered acceptable by the City of San Diego, but higher or lower fences could occur, at the discretion of the City based on individual site-specific conditions.
- 282 Comment is noted. Developed areas are included in Tier IV, although the MSCP does not specifically include "developed" lands as a habitat type. Tier IV is intended to include vegetation types that are ruderal or non-native such as weeds and ornamental plants.
- 283 An attempt was made to identify any raptor nests located on the site, including in existing eucalyptus trees. The eucalyptus trees were not assessed for general health because they are non-native species. Mitigation measure 4.3-11 requires that all raptor nests be identified prior to initiating project grading. All active raptor nests would be protected by the measures outlined in the mitigation measure.
- 284 The orange construction fencing delineates the area to be cleared and graded and effectively notifies workers of project disturbance limits. Silt fencing, or equivalent, would be used as a best management water quality practice during the construction and landscaping establishment period.
- 285 Road pools are depressions formed in dirt roads that pond for extended periods of time. San Diego fairy shrimp are found in road pools in Kearney Mesa to the west and on the Marine Corps Air Station Miramar to the south. Although the potential for fairy shrimp in the noted road pool was considered to be low, without focused surveys, it could not be concluded that this species was not present in the road pool.

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Page Number	Biological Resources	Hydrology/ Water Quality	Alternatives	Other	
4.3-15	Were no sign of large/small mammals found within the project site? This is poorly addressed.				286
4.3-22 and 4.3-28	Information regarding the single gnatcatcher is deficient. Why is this individual mapped within SMC habitat? Was the bird surveyed for in or out of the breeding season? Were US Fish and Wildlife Service protocols used?				287
4.3-31, 4.3-41, and 4.3-52	Any impact to willow monardella should be considered significant due to the 14% loss of watershed availability. Since willow monardella is highly sensitive to any changes within naturally occurring hydrologic regimes, a US Fish and Wildlife Service 10(a) permit for "take" should be obtained.				288

286 Deer, coyote, mountain lion and bobcat are known from the area and were assumed to use the site.

287 USFWS protocol surveys are not required for gnatcatchers if a project does not propose to impact gnatcatcher habitat inside of the MHPA. However, gnatcatcher surveys are still required for CEQA purposes and if appropriate habitat for gnatcatchers is present. The only impacts resulting from the MHPA boundary adjustment on the Sycamore Estates sub-project are to dense chaparral, which is not considered appropriate gnatcatcher breeding habitat. The gnatcatcher identified in the EIR was a single individual observed in Southern maritime chaparral habitat.

288 Impacts to the wouldow monardella were fully addressed through project design. See response numbers 8 through 12. Wouldow monardella is a covered species under the MSCP. Because the project is consistent with the MSCP, no additional permitting is required under the federal endangered species act.

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Page Number	Biological Resources	Hydrology/ Water Quality	Alternatives	Other	
4.3-34, 4.3-36, and 4.3-37	Tier II – should CMC be SMC? Is SMC is being substituted for DCSS? Is this allowed by the US Fish and Wildlife Service, Calif. Dept. of Fish and Game, and County as adequate mitigation for the loss of DCSS? Is CSS supposed to be DSS?				289 290
4.3-42 item 4.3-16	Homeowner education should include a class and materials that discuss the decline of resident bird species, esp. the gnatcatcher, from domestic/feral cats. Education should also include habitats and wildlife and the likely hood of pets being preyed upon as well; reduced back-yard lighting adjacent to open space; open space preservation, trail use, and limited passive use activities (hiking, walking, horseback riding).				291
4.3-42 item 4.3-17	Landscaping of open space/hill sides and slopes should only be done with adjacent local native plant species only. It is preferable to use the on-site or adjacent site native seeds, if possible.				292

RESPONSE

- 289 This typographical error has been corrected in the EIR. SMC is the correct reference.
- 290 Under the MSCP, Tier II habitats (Diegan coastal sage scrub) can be mitigated by conserving Tier III habitats, including southern mixed chaparral, if the conservation occurs within the MHPA.
- 291 Mitigation measure 4.3-16 has been revised to state that "educational materials regarding the sensitivity of the MHPA shall be given to project residents as part of the Project's CC&Rs." The information noted in this comment will be considered in the development of the educational materials.
- 292 Mitigation measure 4.3-17 states that "...newly graded slopes adjacent to the MHPA, and existing fire breaks within the MHPA (not being used for trails) shall be revegetated with native species. . . ." Manufactured slopes would be revegetated using a mulch consisting of native topsoil, along with local native seed.

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Page Number	Biological Resources	Hydrology/ Water Quality	Alternatives	Other
4.3-43 item 4.3-19	Regarding the gnatcatcher and noise issues, what is meant by "substantial coastal sage scrub?" What is meant by the term "substantial" (vegetative cover, occupied gnatcatcher habitat, unoccupied gnatcatcher habitat, or...)?			
4.3-43 item 4.3-19 a.	The gnatcatcher breeding season officially begins on February 15 and ends on August 30 (US Fish and Wildlife Service Survey Protocols, 1997). How will noise levels be monitored during all construction activities?			

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Substantial habitat here refers to habitat capable of supporting the gnatcatcher based on patch size and overall habitat quality.

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The dates of March 1 through August 15 are consistent with the requirements in the MSCP.

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Noise monitoring would only be required if the gnatcatcher is present adjacent to Planning Area 11, and would be conducted by a qualified acoustician using standard noise monitoring equipment and techniques. Specifically, noise monitoring equipment would be placed at the boundary of the construction site to determine the appropriate height for temporary noise walls/berms. Noise levels from construction activities during the gnatcatcher breeding season should not exceed 60 dBA hourly LEQ at the edge of the MHPA or the ambient noise level if noise levels already exceed 60 dBA hourly LEQ. Construction noise in occupied gnatcatcher territories would be measured again after installation of noise attenuation measures and a report on noise levels would provided to EAS by the consulting acoustician. If necessary, additional noise attenuation could be required by the City to ensure that gnatcatchers are not subjected to noise levels over 60 dBA. See mitigation measure 4.3-19.

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Page Number	Biological Resources	Hydrology/ Water Quality	Alternatives	Other
4.3-44	<p>What provisions are in place to protect wildlife that may move through the development during and post construction, along the proposed Rancho Encantada Parkway, across or underneath in through corridors in canyons/draws or along ridgelines?</p> <p>Given that little information exists on large mammal use on the project site as well as adjacent to the project site in Beeler and Sycamore Canyons, as well as movement patterns north to south or south to north, this aspect should be studied or it should be unequivocally assumed that they are currently utilizing the site or will utilize the site in some fashion if current use area are blocked off by construction and/or home sites</p> <p>North/south corridors leading into Beeler and Sycamore Canyons should encompass safe passage under roads, cover, darkness, and other critical factors for large and small mammal survival</p>			
4.3-45	<p>Impacts to wildlife will not be avoided as is stated in first paragraph. Direct and indirect impacts are not fully discussed.</p> <p>What data is available to back up Significance of Impacts?</p>			

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Wildlife movement through the project site during construction is likely to be very limited, given the level of activity typically associated with grading and construction. Wildlife movement through the developed portion of the site is addressed in response number 260 above.

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See response numbers 57, 58, and 260 above.

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Significance determinations are arrived at using CEQA criteria and input and data from various sources, including the U.S. Fish and Wildlife Service, California Department of Fish and Game, the California Native Plant Society, and site-specific survey reports.

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Page Number	Biological Resources	Hydrology/ Water Quality	Alternatives	Other	
4.3-45	<p>Mitigation measures for management and methods to keep people out of open space should be addressed. Open space is not considered recreational lands for humans.</p> <p>What protections are in place to care for MHPA lands? Now and if adjacent to development? Who will be responsible for management? Who will be responsible for public education to preserve open space?</p> <p>It should be noted that as with many other open space set asides and mitigation lands that signage, reduced lighting, gates, etc., do not in and of themselves, prevent meso-predation, trespass, dumping, fires, off-road vehicle use, vandalism, or other forms of human related intrusions and impacts.</p> <p>Furthermore, sanctioned depredation of large mammals (i.e. mountain lion, coyote, or bobcat) should not be allowed unless the particular animal is direct threat to humans. Pets allowed to roam freely in adjacent open space are 'fair game' for these natural predators.</p>				299
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RESPONSE

299 Mitigation measure 4.3-15 requires that fencing be provided in all areas adjacent to the MHPA to limit access into the MHPA. In addition, signage would be placed at trailheads to inform trail users of habitat sensitivity.

300 A Habitat Management Plan has been prepared for the MHPA areas of the Sycamore Estates sub-project site and is attached to the final EIR as Appendix B1 for reference.

301 Comment is noted.

302 Comment is noted.

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Page Number	Biological Resources	Hydrology/ Water Quality	Alternatives	Other	303
4.3-52 item 3.	<p>Current corridor research shows that loss of ridgelines, entry/exit corridors to main corridors, and narrowing of corridors will impact wildlife movement and will therefore decrease the functionality of that corridor and surrounding use areas. Beeler Canyon has already lost its ridgelines and access from the north. The proposed development will further cut off access from the south and prohibit use of ridgelines. Corridor studies, such as Highway 52, should be modeled after</p> <p>Wildlife movement within the project site and within adjacent wildlife corridors should be further studied to determine the actual and potential impacts from construction, development, and human intrusions.</p>				

RESPONSE

303

See response numbers 57, 58, and 260.

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Page Number	Biological Resources	Hydrology/ Water Quality	Alternatives	Other	304
4 3-52 item 3.	<p>There is absolutely no discussion of the arroyo southwestern toad (<i>Bufo macrotis californicus</i>) which is listed as endangered by both the U.S. Fish and Wildlife Service and the California Department of Fish and Game. If surveys were not conducted, why? Have they been observed or surveyed for in the past? Beele Creek has a sufficient seasonal flow of water that could potentially support the arroyo toad. Arroyo toads have been found in drainages that were previously assumed to not have supported them. In addition, it should be noted that arroyo toads have been known to migrate into upland habitats out to one kilometer from their spring and summer stream/riparian habitats (Tim Burr, Camp Pendleton MCB, pers comm). It is highly recommended that a study be developed to determine the presence/absence of the arroyo toad both on the project site and adjacent to it.</p>				

RESPONSE

304 See response number 74.

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Page Number	Biological Resources	Hydrology/ Water Quality	Alternatives	Other		
4.4-13				<p>"The erosion and transport of material within the project site and off site would generate a number of related potential effects..." Potential effects should also include degradation of water quality and impacts to amphibious species like the arroyo toad.</p> <p>How long will erosion control devices be left in place? Recommend that these be monitored and then removed when vegetation cover is sufficient to preclude erosion (typically 3 to 5 years)</p>		305
4.5-1		90% of the flow of run off from the project site will be directed to Beelet Canyon. As stated above, this storm water and residential use run off should be directed to a sewage main and not into the Canyon.				307
4.5-6		Why won't the RWQCB initiate or oversee controls and mitigation of siltation and pollutants into the Penasquitos Lagoon from projects within its watershed? Again, this could be avoided if run off were to be collected within the sewage system.				308

RESPONSE

- 305 No arroyo toads are expected to occur on-site. See response number 74.
- 306 The comment describes the usual process for managing temporary sedimentation best management practices. This information would be included in the Storm Water Pollution Prevention Plans prepared during the final design process prior to permit approval.
- 307 See response number 263. The practice of combining sanitary sewer systems and stormwater systems is in direct conflict with the Clear Water Act and water quality goals.
- 308 The Regional Water Quality Control Board (RWQCB) assigns responsibility to the City through the Municipal NPDES Permit process. The RWQCB does "initiate or oversee controls and mitigation of siltation and pollutants into the Penasquitos Lagoon from projects within its watershed" as part of its regulatory responsibility. See response number 263.

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Page Number	Biological Resources	Hydrology/ Water Quality	Alternatives	Other
4.5-8 and 4.5-18		<p>This text only addresses and satisfies erosion control.</p> <p>More information is needed regarding the basins. Additional information regarding the basins should include: the size of the basins, the holding capacity of the basins, the dissipation and evaporation rates projected within the basins, maintenance and management of the basins (will they be cleaned out periodically and by whom?), what types of pollutants are expected within the basins (typical and atypical), and what measures are in place for overflow or large storm events.</p>		
4.5-21		<p>What is meant by "Detention basins remove pollutants primarily through sedimentation of solids, but also through biochemical processes in the basin during the dry weather periods that follow storms"</p> <p>Please specify more detail regarding "biochemical processes." Again, what will the management of these basins entail?</p>		

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RESPONSE

309

EIR Section 4.5, HYDROLOGY/WATER QUALITY, addresses potential impacts to drainage patterns, amount and rate of runoff, and water quality related to urban pollutants and sedimentation.

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See response numbers 262 and 279.

311

Certain pollutants of concern, for example petroleum products, attach to sediment particles carried in the runoff. This is the reason mechanical oil/water separation devices contain "grit chambers" and "sedimentation chambers". Sediment itself is a pollutant of concern in this drainage basin. Detention basins and extended detention basins are designed with components that allow sediment to settle out of the runoff water. The biochemical processes that occur in the basin during the dry weather periods that follow storms result from bacteria, exposure to sunlight, plant growth and other natural processes that break down and modify pollutants. As required by the federal, state and local agency regulations, the project SWPPPs would identify maintenance entities and requirements for the permanent water quality protection measures.

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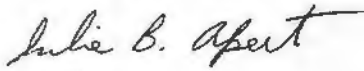
Page Number	Biological Resources	Hydrology/ Water Quality	Alternatives	Other
4,5-21	Define what a "Vegetation Basin" is and it's purpose, design and management. How will the CDS Units be maintained and cleaned?			
9-1			See discussion above in Section 5, a. through f. (pages 3-6) of this letter	

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313

If there are any questions regarding the information in this letter please do not hesitate to call me at 619-473-9669.

Sincerely,
Ecological Ventures California, Inc.



Julie B. Alpert
President/Wildlife Ecologist

Attachment

RESPONSE

312

A Vegetation Basin is designed to treat runoff for pollutants of concern by contact with vegetation leaves, stems and roots within the basin. Filtering may be accomplished using Vegetation Basins. Vegetation Basins may be components of other water treatment basins or may stand alone. See response number 311 regarding permanent water quality protection measure maintenance.

313

See response numbers 260 through 269.



The Forest News

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Hundreds Enjoy a *Twilight on the Hacienda*

Over 250 people gathered at the magnificent 2600-acre Rancho Soyuztagama on October 15th to honor Theodore Roosevelt's 142nd birthday and his legacy, The Cleveland National Forest. Hosted by The Cleveland National Forest Foundation (CNFF), this event, named *Twilight on the Hacienda*, was a wonderful social, educational, and cultural function.

The event began at 2 p.m. with live Latin music greeting the guests as they approached the grounds of the ranch. A harpist played organically, and entertained guests in the nearby field overlooking the pond where painters, sculptors, and artists displayed their work.

Visitors to the ranch were invited to explore the grounds; the ranch is home to a variety of animals including swans, geese, ducks, horses, llamas, and buffalo. They also enjoyed the many displays including Bardot Books, Theodore Roosevelt Association, Sweetwater Water Authority, SD Water Authority, and the U.S. Forest Service among others.

Special thanks to Project Wildlife for presenting a fascinating array of rescued and rehabilitated wildlife. Mid-afternoon, the guests witnessed a rare occurrence; they were enthralled as Project Wildlife formally released a rescued and recovered red tailed hawk back into the wild.

Immediately following the release, wildlife biologist Michael Soule,

gave the keynote address. His inspiring speech addressed the need for wildlife corridor connectivity in San Diego's backcountry. He expressed his concern for the many new 20-acre ranchettes, many that they come biological sinks, inefficiently consuming land and natural resources. Duncan McFetridge introduced CNFF's Conservation Easement Program, designed to help landowners and ranchers receive substantial tax deductions by keeping their land in uses compatible with the forest.

The guests enjoyed gourmet cuisine, which was beautifully presented and generously underwritten by the Picnic People, part of San Diego's premier catering company, Hospitality, Inc. CNFF is very grateful to Lisa Richards, President and CEO, for awarding this grant to CNFF and for providing such a lovely repast for our guests.

The inimitable Art Madrid, Mayor of La Mesa, presided over a very entertaining live auction; one of the highlights was when Dan Britton purchased a week at the Golden Deer (donated by the wonderful Deborah Szekely), much to the delight of his wife, Allison. The guests were treated to the incredible music of Mark and Barbie Hattersley, and many danced until late in the evening.

CNFF would like to thank all of those who attended "Twilight on the Hacienda", and all of the artists, musicians and volunteers who made this such a special and memorable event.

Season's Greetings

CNFF would like to extend warm thanks to everyone who generously donated their time and money in 2000 to help us protect our treasured forestlands. With your invaluable support, CNFF was able to complete the purchase of the Ellis Ranch, often called "Gateway to the Cuyamaca" and deed it back to the Cleveland National Forest. In the upcoming year, CNFF has exciting plans for growth and development, and we need your help. There are so many ways in which you can give. CNFF is a nonprofit organization, and your donations are tax deductible. We accept donations in many forms such as personal gifts, stock transfers, real property

Conservation Easement

The Cleveland National Forest Foundation (CNFF) recently introduced Conservation Easement Program, a landmark step in protecting the remaining Cleveland National Forest. This innovative program can help you protect your land, preserving it for future generations, and can also save you many thousands of dollars in taxes.

CNFF can give you and your family guidance in how to protect your land through a conservation easement or a charitable remainder trust.

LETTER OF COMMENT

RESPONSE

To: Planning and Development Review Department
Regarding LDR 99-1094
SCT# 2000011053

Andrea Barnes a
Friends of Goodan Ranch/ Sycamore Canyon Preserve
Member, responds to the Draft Environmental Impact Report
issued Nov 22, 2000 by the City of San Diego
for the Rancho Encantada Precise Plan

January 4, 2001

**In response to
the Draft Environmental Impact Report
issued Nov 22, 2000 by the City of San Diego
for the Rancho Encantada Precise Plan**

**To: Planning and Development Review Department
Regarding LDR 99-1094
SCH 2000011053**

The Friends of Goodan Ranch offers comments on the City of San Diego's Draft EIR for the proposed Rancho Encantada Development. We find that the draft EIR is inadequate and incomplete as it relates to the impact on Biological Resources that affect the regional open space plans and the needs of the Goodan Ranch/Sycamore Canyon Preserve

- The draft does not offer an analysis on the effects of the plan regarding regional movement of wildlife. It simply concludes that the wildlife has to "go around." 314
- The draft EIR does not adequately address the effects on Hydrology/Water Quality on the Goodan Ranch Preserve and on the connecting City of San Diego Parcel and associated West Sycamore Canyon Open Space. 315
- The draft EIR does not address the North-South flow of wildlife between Sycamore Canyon and Beeler Canyon. 316

All of these are significant and important considerations for the regional movement of wildlife and for the protection of their habitat. In addition and perhaps most importantly, it does not address:

- How to keep toxic water runoff out of the canyons and pollution out of the ground water. 317
- The draft EIR does not address how to keep light from shining into the MHPA areas and from disrupting biological activities. What constitutes light shining on MHPA areas? 318
- The draft EIR does not address the height and effectiveness of fencing in preventing edge effects on MHPA lands. 319

Alternatives to the proposed plan are not adequately considered. The Precise Plan is asking to take MHPA land from the Eastern portion of the proposed development (for the 20.4 acre P.A. 11 area, Precise Plan figure 3-1) in exchange for land in the interior of the development. By any estimate the taking of the MHPA land for P.A. 11, for the purpose of building into the major North-South wildlife corridor across the ridgeline, impacts the habitat quality of the entire MHPA of the region, the North-South ravines adjacent to the Eastern and Western boundary of the Sycamore Estates Sub-Project P.A. 11, and the ridgeline corridor in the City of San Diego open space parcel. This directly effects the viability of wildlife populations since these corridor links and habitat connect the wetland in Beeler Canyon to Sycamore Canyon and West Sycamore Canyons. 320
321

The proposed Eastern most development, P.A. 11, is asking for a Parkway across the ridgeline on City of San Diego MHPA land which will effectively cut off wildlife flow over the ridgeline East of the military-industrial fenced area. The direct effects of the taking of this MHPA land have not been analyzed. Why should the City of San Diego give up this high value MHPA area in exchange for other areas which are enclosed by the Project and of far less value? Why should there not be alternatives to such an unfair exchange for the MHPA. 322

The fair alternative is the Reduced Project Plan, as it eliminates the intrusion onto the vital MHPA linkages. At minimum the MHPA should not give away either the land on proposed P.A. 11 nor allow a parkway across the City of San Diego Parcel ridgeline. 323

314 See response numbers 57 and 58.

315 The project does not propose to develop within the drainage basin containing the Goodan Ranch Preserve. Because there would be no project development in this basins, nor would any urban runoff be directed to or toward the basin, no significant direct or indirect impacts to the hydrology or water quality of the basin containing Goodan Ranch would occur.

A detailed Hydrology Technical Report (March 27, 2001) for West Sycamore Canyon is included as part of the Administrative Record, and is available for review at the offices of the City of San Diego Land Development Review Division. The hydraulic analysis examines the effect the change in peak flow might have on hydraulic variables at two cross-sections, one at the upper part of the watershed and one at the lower part of the watershed. The specific variables considered were depth, flow velocity, and shear. The analysis concludes that although there would be a reduction in peak flow rate between the existing and proposed condition, there would be little change in the depth, average velocity and average shear due to the reduction in peak flow. Thus, as disclosed in EIR Section 4.5, the project would not result in a significant adverse change to drainage patterns. Potential water quality impacts to West Sycamore Canyon would be mitigated by design and through the implementation of mitigation measures 4.5-1 through 4.5-9. Also see response nos. 75A and 149/50.

316 Wildlife movement is expected to be maintained between Sycamore Canyon and Beeler Canyon. See response numbers 57 and 58.

317 The EIR does address water quality protection measures for the canyons and ground water. See EIR Section 4.5, HYDROLOGY/WATER QUALITY. Also see response numbers 10, 76, 149, 262, 277, 278, 279, 311 and 312.

318 Impacts from light would be minimized through mitigation measure 4.3-14, which requires the preparation and approval of a lighting design plan. The plan must minimize exterior lighting in development areas adjacent to the MHPA, and where needed, lighting would be selectively placed, shielded, and directed away from native habitat.

319 Mitigation measure 4.3-15 requires the preparation and approval of a fencing plan for the project. The final height of the fence located between development areas and MHPA open space would be determined by the Environmental Review Manager of the Land Development Review Division.

LETTER OF COMMENT

RESPONSE

- 320 A reasonable range of alternatives pursuant to State CEQA Guidelines is included in EIR Section 9.0.
- 321 The areas outside of the MHPA included the ridgeline in Planning Area 11 (see EIR Figure 2-7). The boundary adjustment in this area would move the development footprint approximately 100 feet to the east. The acreage affected by the adjustment would be offset by the addition of 348 acres of MHPA lands for the project as a whole. See also response numbers 57 and 58.
- 322 The existing roadway that crosses the City of San Diego-owned parcel along this ridgeline actually has higher traffic volumes when the existing defense-related industrial facility is in use than it would upon completion of buildout of Planning Area 11 (see EIR Appendix E). The proposed Rancho Encantada project would preserve open space to the north and east of the City-owned parcel and the MHPA would be expanded by 348 acres. The area to the north of the City-owned parcel supports a number of sensitive species, and the area to the east provides additional buffering of willow monardella populations.
- 323 Comment is noted. See response numbers 321 and 322.

As often a few photographs linkages for visual aides

324

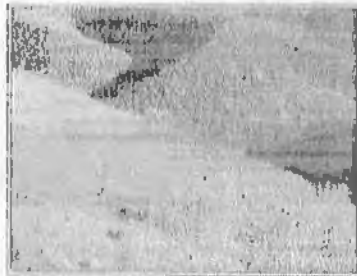


This picture is taken from the Goodan Ranch/Sycamore Canyon floor hiking south up to the top where West Sycamore Canyon and Sycamore Canyon join.

Major movement of wildlife North and South across City of San Diego MHPA land on ridgeline.

This is one of the many animal trails leading north west out of Sycamore Canyon towards the adjoining canyons.

Typical evidence of North-South movement between Sycamore, West Sycamore and Beeler Canyons.



This picture is taken from the western slope of Sycamore Canyon looking east, back into the valley.

Example of animal linkages between the Sycamore Canyon wetland and the Beeler Creek wetland North of proposed Rancho Encantada Precise Plan.

324

Comments and photos are noted.

LETTER OF COMMENT

The picture below was taken looking north towards the military facility at the top of West Sycamore Canyon. Notice all the fencing that stops the flow of animals. Wildlife crosses to the left of the picture, moving up/down the East and West ravines surrounding proposed 20.4 acre P.A. 11 home sites. Ridgeline to left of picture is location of proposed feeder parkway effectively blocking this wildlife corridor.

325



Ridgeline corridor

326

Below shows the ridgeline of the proposed parkway to P.A. 11. at the top of both Sycamore and West Sycamore Canyons. Notice all the fencing to the right. If the *Reduced Plan Alternative* was adopted, the small area on the left side of this picture would remain open. New building in this area would halt this flow.

327



North/South wildlife corridor linkages across ridgeline of proposed Parkway to P.A. 11 for Sycamore Estates in Precise Plan.

328

RESPONSE

325 Wildlife would not be precluded from continuing to move through this area. As noted in response number 322, vehicular traffic is actually reduced along the existing roadway on this ridgeline. The primary wildlife movement area remains to the east of Planning Area 11.

326 Photo is noted.

327 See response number 325.

328 See response number 325.

LETTER OF COMMENT

From the Northern ridgeline of Sycamore Canyon Looking south into West Sycamore Canyon.

329



West Sycamore Canyon is a major Wildlife link all the way to Mission Gorge.

330

Should the Reduced Project Alternative be adopted, the corridor up this canyon and over the ridgeline, shown in previous photographs, will continue to be the primary linkage between the populations of the San Diego River inland valley wildlife and the Penasquitos/Beeler Canyon watershed.

331

Respectfully submitted
January 4, 2001

Andrea Barnes, member
FRIENDS OF THE GOODAN RANCH/
SYCAMORE CANYON PRESERVE

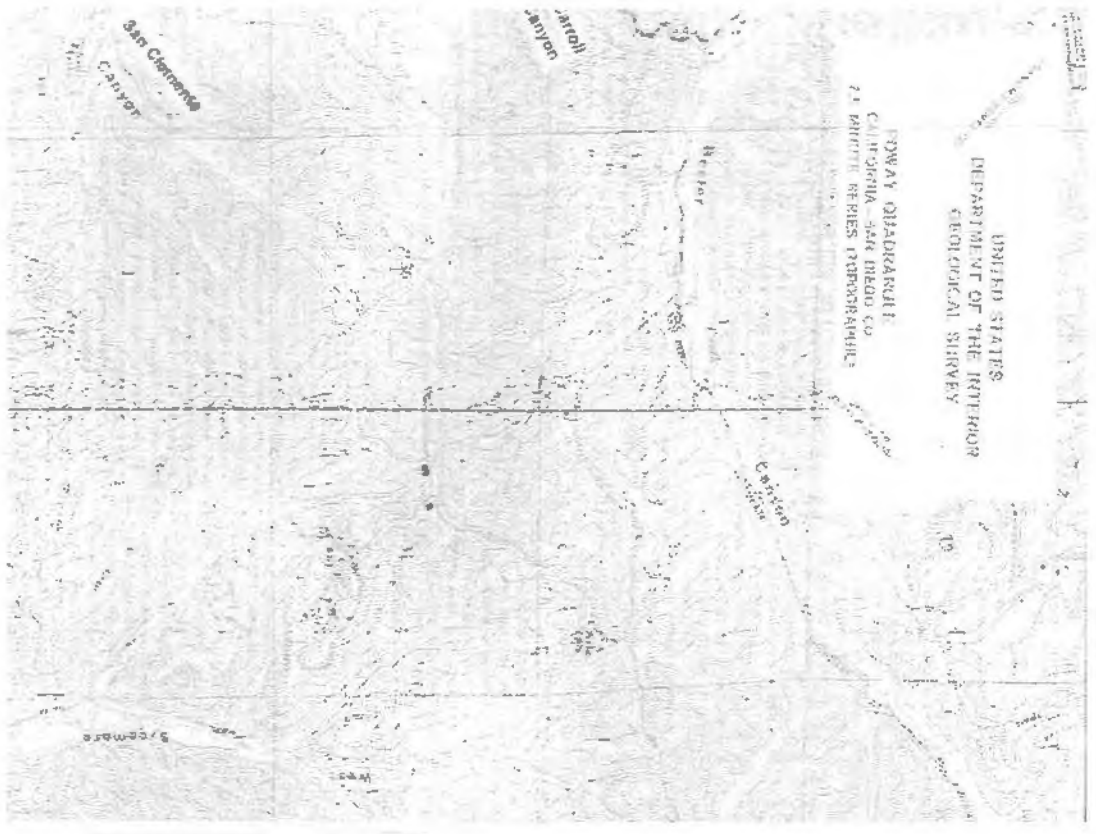
RESPONSE

329 See response number 325.

330 Comment and photo are noted. See response number 325.

331 The primary wildlife movement area is located east of Planning Area II and would be preserved as open space both under the proposed project as well as the Reduced Project Alternative.

LETTER OF COMMENT



RESPONSE

RANCHO ENCANTADA EIR

LETTER OF COMMENT

Beeler Creek Conservancy

14710 Beeler Canyon
Poway, CA 92064
760-633-1635
Telefax 760-633-1172
nudykeam@pacbell.net

5 January 2001

Lawrence C. Monserrate, Environmental Review Manager
Planning and Development Review Department
CITY OF SAN DIEGO
1222 First Avenue, Fifth Floor
San Diego, CA 92101

Via Telefax 619-446-5499 (8 Pages) & Hand Delivery

RE: Rancho Encantada Precise Plan, Draft DEIR Dated Nov 22, 2000
LDR No. 99-1094, SCH No. 2000011053

Dear Mr. Monserrate:

Beeler Creek Conservancy is the owner of the 12.8 acre parcel of land in the City of Poway, APN 323-100-0400, adjoining the proposed Rancho Encantada project. The Conservancy's mission is to preserve, restore and create habitat in the vicinity of Beeler Canyon to support, heal and inspire plants, animals and humans.

We have reviewed the above-referenced draft Environmental Impact Report for the Rancho Encantada Precise Plan (the "DEIR") and we have the following comments and questions to that report.

As stated on page 8 of the DEIR, "the Reduced Project Alternative would be considered the environmentally superior project alternative because it would have fewer and less severe environmental impacts than the other project alternatives." We agree with this conclusion of the DEIR.

332

Regarding the Executive Summary, Environmental Setting at page ES-2, this section should explain that the project is in an environmentally sensitive location because it is surrounded on three sides by environmental resources of regional importance to the success of the Multiple Species Conservation Program ("MSCP"), the Beeler Canyon Regional Wildlife Corridor to the north, the Sycamore Canyon Regional Wildlife Corridor to the east and the City of San Diego's MHPA to the south.

333

Regarding the Executive Summary, Biological Resources beginning at page ES-6, this section should explain the effects the project will have in diminishing the networking of habitat.

334

RESPONSE

332 Comment is noted.

333 The project site's context in relation to wildlife corridors is discussed in EIR Section 4.3. A summary of this context has been added to the Executive Summary page ES-2.

334 Significant impacts on wildlife movement were not identified. See response numbers 57 and 58.

LETTER OF COMMENT

RESPONSE

Lawrence C. Monserate, Environmental Review Manager
5 January 2001
Page 2

Regarding the Executive Summary of the Reduced Project Alternative beginning at page ES-19, this summary should also explain the ways in which this alternative will make it easier for wildlife to effectively utilize the MSCP regional "Linkages" and the networking of habitat.

335

Regarding Section 4.2, issue 2 on page 4.2-18 of the DEIR, the report has failed to examine the visual affect of the Sycamore Estates project in the scenic area near the joining of the Beeler Canyon Regional Wildlife Corridor and the Sycamore Canyon Regional Wildlife Corridor (see arrows designating corridors at Figure 4.3-3).

336

Regarding Figure 4.3-3, Wildlife Corridors / Linkages, existing local wildlife corridors which connect the Beeler Canyon Regional Wildlife Corridor with the

337

Regarding Section 4.3, issue 2 on page 4.3-43, "Will the project interfere with the movement of any resident or migratory fish or wildlife species?". The DEIR has failed to disclose data or evidence to support its conclusion that, "Significance of Impacts There would be minimal impacts to wildlife movement. Impacts would not be considered significant" (pg 4.3-45).

338

It must be noted and analyzed that this issue is unusually critical to the proposed project because the project is located at the intersection of the Beeler Canyon Regional Wildlife Corridor for east-west movement and the Sycamore Canyon Regional Wildlife Corridor for north-south movement.

It should be recognized that the wildlife corridors include local corridors in addition to regional corridors. Local corridors need to be identified and analyzed for their importance in meeting the objectives of the MSCP.

339

Attached is a relevant portion of the 7.5 Minute Series (topographic), US Geological Survey, Poway Quadrangle. This map depicts certain canyon as having seasonal streams. A map with depiction of these seasonal stream beds/wildlife corridors should be included in the DEIR.

340

Studies should be performed in each of these seasonal stream beds/local wildlife corridors to analyze wildlife movement and reports should be prepared to analyze the affect of the project on this movement and the affect upon the City of San Diego's MHPA land adjacent to the project as well as the success of the City of San Diego, the City of Poway's MSCP and the County's MSCP plan to preserve a network of habitat and open space that will protect biodiversity.

341

335 The proposed project and the Reduced Project Alternative would not result in significant impacts to wildlife movement. Under the Reduced Project Alternative, no encroachment into the MHPA would occur, and a MHPA boundary adjustment would not be necessary. The Executive Summary has been expanded to note that the Reduced Project Alternative would provide a wider wildlife corridor in Beeler Canyon.

336 The City of San Diego's significance criteria for the visual quality analysis addresses views from public areas. The location noted by this comment is a natural open space area that is not a public area. Although this area would be conveyed to the City of San Diego as part of its MHPA, no trails are proposed in the location indicated by this comment; therefore, it is not considered to be an existing or future public viewing area. Therefore, visual quality impacts were not identified at this location.

337 This comment is incomplete. No response is possible.

338 Potential impacts to wildlife movement resulting from the proposed project were assessed within the context of the MSCP and found to be less than significant. The project, as proposed, would preserve the mapped wildlife corridors along Beeler Canyon and Sycamore Canyon as identified in the City of San Diego's MSCP Subarea Plan and the City of Poway's Final MSCP. See also response numbers 57 and 58.

339 Local wildlife movement would occur throughout project open space. The project as proposed would not decrease any local wildlife movement beyond what was already approved as part of the City's adopted MSCP. In fact, the proposed project would increase the MHPA by 348 acres beyond that called for in the City's adopted MSCP Subarea Plan, increasing opportunities for local wildlife movement. Regional movement of wildlife would occur through Beeler Canyon and Sycamore Canyon.

340 Ephemeral drainages and natural flood channel are delineated on all resource-based maps in the EIR. See Figures 4.3-1, 4.3-2, 4.3-4, 4.3-5 and 4.3-6.

341 The level of analysis for the project is consistent with requirements for projects of this scope. No additional studies are warranted. See also response number 260.

Lawrence C. Monserrate, Environmental Review Manager
 5 January 2001
 Page 3

It must be noted and analyzed that the far east leg of Sycamore Estates will radically encroach upon and effectively cutoff an existing local wildlife corridor/seasonal stream bed which directly connects Beeler Canyon Regional Wildlife Corridor with the City of San Diego's MHPA land in West Sycamore Canyon.

342

As cited on page 4.1-5, the MSCP Guidline 28 requires that, "Any potential development associated with the areas of the MHPA outside the conservation easement ... must assure continued wildlife movement through West Sycamore Canyon". The DEIR has failed to provide data to support such an assurance.

343

It must be noted and analyzed that the project will isolate and effectively cutoff existing local wildlife corridors/seasonal stream beds which connect to San Clemente Canyon and to Carroll Canyon to the Beeler Canyon Regional Wildlife Corridor.

344

No studies are discussed or referenced in the DEIR which explain how and what wildlife is currently moving through the proposed project to the existing Regional Wildlife Corridors.

As the project is proposed, all wildlife traveling in drainage corridors which need to transition from the east-west corridor to the north-south corridor are required to pass through the Beeler Creek Conservancy property. The DEIR has failed to analyze such a single point access.

Regarding Section 5.2.4, "Hydrology/Water Quality", the last paragraph of this section indicates BMPs will not be 100 percent effective and that cumulative water quality impacts will be significant and unmitigable. Studies should be included to provide estimates as to the percentage how effective the BMPs are expected to be.

345

Well water is used for human consumption at the Beeler Creek Conservancy property. A report should be included in the DEIR to consider the affect of the significant and unmitigable impacts on water quality to well water in Beeler Canyon. If there is a potential affect on the water quality for human consumption at the Beeler Creek Conservancy property, city water should be provided to the Beeler Creek Conservancy to mitigate this affect.

346

Section 1.4.3.1 of the MSCP states the BMP systems to be implemented require annual maintenance. The DEIR should explain who will provide this maintenance and how proper maintenance will be assured into the future.

347

342 Planning Area 11 was always contemplated in the development of the MHPA for the property (see EIR Figure 2-7). The overall size of Planning Area 11 is less than that allowed under the MSCP. See also response numbers 322 and 325.

343 See response numbers 322 and 325.

344 See response numbers 57 and 58.

345 Estimates as to the effectiveness of permanent water quality protection measures vary by the pollutant of concern, the concentration of pollutant in the water, the design of the selected measure, and the source of the estimate, among other factors. The EIR correctly bases its analysis on the understanding that no practical water quality protection measures or combination of practical measures can guarantee 100% effectiveness. This does not mean, however, that the permanent post-construction water quality protection measures proposed for the project would not meet the requirement of the federal, state and local agency regulations to reduce pollutants to the maximum extent practicable. Studies providing estimates of effectiveness are not necessary for the EIR to adequately assess the potential impacts of the project on water quality. Due to the fact that best management practices may not achieve 100% effectiveness, the EIR concludes that cumulative water quality impacts would be significant and unmitigable.

346 Because Rancho Encantada would be primarily a residential project, the pollutants that might be of concern are total dissolved solids (TDS), hydrocarbons, nitrates, pesticides, herbicides and other analytes. However, the fertilizers, pesticides, herbicides and other products available to the homeowner, landscaper, etc. are limited to relatively non-persistent products that are addressed by the water quality mitigation measures proposed for the project in EIR Section 4.5, HYDROLOGY/WATER QUALITY. The project's potential adverse impacts to groundwater quality would be less than the no project alternative or continued industrial use of the property. A discussion of potential well water impacts has been added to final EIR Section 4.5. Also see response number 151.

347 The federal NPDES, state General Construction Permit, and mitigation measures 4.5-2 and 4.5-7 require that the project's SWPPPs identify the maintenance entity and requirements prior to the issuance of permits. See also response number 311.

Lawrence C. Monserrate, Environmental Review Manager
 5 January 2001
 Page 4

Regarding Section 6.1, "Risk of Upset", because of the history of the subject property's use for military industrial purposes, the DEIR should disclose whether or not any such uses have occurred or are continuing on the property which may require an emergency response.

348

Regarding Section 6.4, "Light and Glare", should include a report which specifies the lighting that will be used which may affect the MHPA and it should consider the affect on such lighting on the MHPA open space.

349

Section 10, "References" should include the City of Poway's MSCP, Habitat Conservation Plan.

350

Interested parties may have some difficulty submitting comments to the DEIR, the second sentence of the first paragraph of the "Public Notice of A Draft Environmental Impact Report", dated November 22, 2000, requires written comments be "received by the Land Development Review Division at the above address by January 5, 2001". There is no "above address" on that Notice.

351

Regarding brush management, we have found no reference to who will be responsible for Brush Management in the Zone 2 areas adjacent to the MHPA. The better practice is to delegate such responsibility to a professional third party that will perform such clearing in accordance with the MSCP Guidelines discussed on page 4.1-6 of the DEIR. In order to consider allowing individual homeowners to have such authority to enter the MHPA area for brush clearing, a study should be performed to compare guideline compliance by professional third parties as compared to individual homeowners.

352

Regarding revegetated manufactured slopes, we have been unable to locate a discussion of the BMPs that will be used to assure successful revegetation. The attempted revegetation may be unsuccessful, as has been the case with some revegetation attempts on the north side of Beeler Canyon. These failures may be caused by lack of rain over the past years. The DEIR should consider the possibility of such failures and discuss whether a second planting would occur and, if so, how would such an expense be paid.

353

Regarding the Mitigation Monitoring and Reporting Program, the "Management Element at page 27 of the MHPA Guidelines require Mitigation Program provide assurances that the mitigation areas will be managed and monitored in a manner consistent with the MSCP.

354

348 Potential impacts due to hazardous materials are disclosed in EIR Section 4.12. No uses or materials exist on the site as identified in the Phase I Environmental Assessments (see EIR Appendices K1 and K2) which would cause a risk of upset.

349 A statement has been added to EIR Section 6.4 that refers the reader to Section 4.3, BIOLOGICAL RESOURCES, for a discussion of potential indirect lighting impacts on the MHPA. The City's MSCP Subarea Plan includes guidelines for development proposed adjacent to the MHPA, called the Land Use Adjacency (LUA) Guidelines. One of the LUA Guidelines states that lighting of all developed areas adjacent to the MHPA should be directed away from the MHPA. The proposed Rancho Encantada Precise Plan and Design Guidelines and Development Standards recommend that the amount and intensity of lighting be limited to that necessary for safety, security, and to compliment architectural character, and that lighting of all areas adjacent to MHPA open space be shielded and directed away from the MHPA. Adherence to the project's proposed Design Guidelines and Development Standards would eliminate the potential for impacts associated with lighting.

350 The reference has been added.

351 The word "above" should have been "below." The address and a contact phone number were listed on page 2.

352 Brush management within City of San Diego brush management zone 2 would be delegated to a professional third party by the responsible maintenance entity, identified in the EIR as a homeowners association or maintenance assessment district or other appropriate maintenance entity. Individual homeowners would not have the authority to enter the MHPA areas for the purpose of brush management.

353 Manufactured slopes and other disturbed areas would be revegetated in accordance with the City of San Diego Landscape Technical Manual that contains performance criteria and specifications to assure successful revegetation. This issue is also addressed in the Habitat Management Plan prepared in conjunction with the project. Also see response number 300.

354 See response number 300.

LETTER OF COMMENT

Lawrence C. Monserrate, Environmental Review Manager
5 January 2001
Page 5

We have found no reference as to how the designated open space areas are to be managed. Various issues may be raised dependant upon the anticipated method of managing the dedicated open space.

354

Regarding the Mitigation Monitoring and Reporting Program, the manager of the dedicated open space should be a party to the homeowners' CC&Rs to provide that manger with standing to enforce the CC&Rs. The CC&Rs should specifically prohibit homeowners from violating the MHPA Guidelines for homes abutting MHPA land.

355

We appreciate this opportunity to participate in reviewing the DEIR. Thank you for your attention to our concerns.

Very truly yours,

BEELER CREEK CONSERVANCY



Andrew Kean
Manager

RESPONSE

355 The City of San Diego would be the "manager" of MHPA areas dedicated to the City. The City of San Diego Code Enforcement Officer would have the authority to enforce the land use adjacency restrictions for areas abutting city-owned MHPA open space. The proposed project's master homeowners association would be the responsible party to enforce the CC&Rs.

LETTER OF COMMENT

RESPONSE

Earth School

14710 Beeler Canyon Road
Poway, CA 92064-6121

January 5, 2001

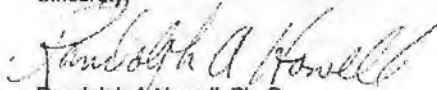
To: Lawrence C. Monserrate
Environmental Review Manager
Planning and Development Review Department
City of San Diego

Dear Mr. Monserrate

Under this cover find our response to your draft Environmental Impact Report for the LDR No. 99-1094, Subject: Rancho Encantada Precise Plan for the approximately 2,658- acre development in the Beeler Canyon future Urbanizing Area (FUA). In general, we find the draft EIR unsatisfactory and incomplete in several areas including the Environmental Analysis of Existing Conditions and of the Effects on Biological Resources, Hydrology/Water Quality, and Effects Found not to be Significant and Alternatives

356

Sincerely,


Randolph A Howell, Ph. D.
Director, Earth School

356

Comment is noted.

Earth School Land Cover Studies**A Response to the Draft Environmental Impact Report**

**Subject: Rancho Encantada Precise Plan in Future Urbanizing Area
LDR No. 99-1094**

1. Biological Resource Impacts

A. Multiple Habitat Planning Area (MHPA) adjustment is required to implement the precise plan. You should deny the adjustment. They are proposing to reduce MHPA land on the Montecito project and in effect cut the North South flow of wildlife between Beeler Canyon and habitat running South to the San Diego River. The proposed increase in MHPA area (net gain of 348.3 acres EIR pg. 3-32) for the City of San Diego does not add up to a significant benefit simply because of the amount of acreage added to MHPA. They are proposing to add areas to the MHPA within the development that are a mostly steep slope, and which would be left as open space even if not included in the MHPA. In fact, there is no data in the EIR to support the contention that the overall effect of such boundary adjustments would benefit the flora and fauna of the region. Those assessments need to take into account the actual position and the quality of the habitat within the overall project. The draft EIR contends that the proposed additions in the Sycamore Estates are "adjacent to large areas of natural habitat within the MHPA to the East." (see Page. 4.3-53) This is not true. That area proposed to be added will be bound on the East by Sycamore Estates sub-area P.A. 11 and the Great Wall of the Encantada Parkway. If Sub-area P.A. 11 of the Sycamore Estates and the Parkway were eliminated then the draft EIR's position would be correct,

357

357

The project as proposed would not decrease any north-south wildlife movement beyond what was already approved as part of the MSCP. With implementation of the proposed project, the MHPA would be approximately 348 acres larger than what is required under the MSCP. All of the areas proposed to be added to the MHPA are adjacent to existing high quality habitat, and enhance the overall value of the MHPA in the area. Planning Area 11 was always contemplated to be developed during the MSCP process (see EIR Figure 2-7). It should be noted that the MHPA boundary adjustment approval is determined by the City in consultation with the U.S. Fish and Wildlife Service and the California Department of Fish and Game, and is dependent on maintaining the biological functions and values of the MHPA. Also see response numbers 57, 58, 322 and 325.

Janua

B. The effects on habitat linkages and function of preserve areas are too great to be passed over so casually. The proposed taking of 4.6 acres of MHPA land for the development of the Eastern most part of the Sycamore Estates sub-project severely affects the mission of the MHPA to preserve core biological resource areas and corridors. From our analysis, the proposed adjustment would be detrimental in both the Montecito development and the Sycamore Estates development. The City of San Diego should require a more extensive environmental impact analysis as to the effects on the MHPA mission if that boundary adjustment is done. Concerning regional wildlife corridors, the draft EIR points to the County of San Diego MSCP -Sub-Area Plan 5/19/00 (See draft EIR fig. 4.3-3) and indicates that all wildlife must go around the Montecito and Sycamore Estates Developments. Those yellow arrows do not indicate the true nature of the wildlife movement within the actual MHPA areas. The actual North/South flow of wildlife comes over the hills between Sycamore Canyon, West Sycamore Canyon and Beeler Canyon. The City of San Diego parcel is critical in keeping this flow open because of wildlife movement West of the fenced industrial area to the East of the City of San Diego parcel. Allowing P.A. 11 to proceed would block this flow. There is no analysis of this crucial corridor in the draft EIR. By taking the several acres from the MHPA and applying it to P.A. 11 in the Sycamore Estates sub-project, the developer will build over into the canyon, intruding into this North/South corridor. The edge effects of such an intrusion will effectively take out much of that very high quality habitat and corridor, which is contiguous with MHPA land to the East. This will be a much greater loss than what would be gained from adding unbuildable slopes on the Western side of P.A. 11 to the MHPA. This seems in violation of the idea of having the MHPA in the first place. We need to have some kind of analysis as to the value of the real loss of habitat /as opposed to the number of acres gained in the trade. In addition, fire has severely degraded or destroyed areas that the developer proposes to trade for this significant corridor intrusion. The entire draft EIR analysis of the exchange is no longer valid because the draft EIR does not reflect conditions that exist now and even the previous five months prior to its issuance.

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See response numbers 57 and 58.

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See response numbers 322 and 325.

360

See response numbers 57 and 58.

361

Fire is a natural component of chaparral and sage scrub communities in southern California. Many species are fire-adapted in that they quickly resprout from basal burls following fire. Other species actually require fire in order to regenerate. The site was assessed based on a mature vegetation community, and the recent fire has no bearing on the assessment of project impacts or the MHPA boundary adjustment.

January

C. Rancho Encantada Parkway: The building of Rancho Encantada Parkway across the ridgeline of the development constitutes a great wall that adds an insurmountable obstacle to the regional wildlife flow. The Reduced Project Alternative is far superior. An analysis should be presented which shows the true differences between the Reduced Project alternative and the Precise Plan in regards to effects on the mission of the MHPA.

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2. Open Space Element: They contend that no conflicts of the open space element occur because there will be 100% preservation of the City of San Diego owned parcel. See Page 4.1-15. On the previous page, they say (except for a road crossing Page 4.1-14). It turns out that the "road crossing" is the building of a parkway across major wildlife corridor linkages. The city should require an analysis of this conflict, on the City of San Diego owned parcel, of the open space element in order to determine the true environmental impact.

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3. Existing Conditions: Existing conditions reported under section 4.3 no longer exist. These conditions did not exist for five months before the issue of this draft EIR. In June 2000, on an afternoon when the wind was blowing (unusually) out of Beeter Canyon and up the slopes of the development footprint, someone started a fire in the densest landcover in this part of the county. By time the fire was put out, at great tax payer expense, and much to the developer's favor, much of the oak woodland and heavy mixed chaparral was gone. Also gone were the troublesome raptor nests, potential listed flora and fauna, as well as obstacles to surveying and grading. It was an extremely hot fire and the oak woodlands will be a long time recovering. The biological resources listed in the EIR are no longer valid, especially in that they are proposing to trade some of those resources (which now do not exist) for extremely valuable MHPA land. You wonder how a report could be issued on something that has not existed for 5 months. Some of the survey was done in 1993 (Page 4.3-1) by Michael Brandman and Associates. How is it possible to take any of this seriously? Clearly, the analysis of existing biological resources needs to be redone.

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See response numbers 322 and 325.

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The road crossing referenced by this comment is an existing roadway that serves existing defense-related industrial uses located on the eastern portion of the Sycamore Estates sub-project site. The portion of this roadway that crosses the City of San Diego-owned parcel is not included in the MHPA (see EIR Figure 2-7). Except for improvements to this existing roadway required by the City and an access road proposed to Planning Area II that would disturb 2.5 acres, the City of San Diego-owned parcel would be preserved as natural open space. Improvements to an existing road and construction of a road segment over 2.5 acres of this 248-acre parcel would not result in a conflict with the Open Space Element. Biological resource impacts from the mentioned road improvements would be fully mitigated as discussed in EIR Section 4.3. Also see response number 322.

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See response number 361. The oak woodland referred to in the comment is actually southern mixed chaparral with a heavy mix of very mature scrub oaks. Scrub oaks are shrubs not trees. This should not be confused with coast live oak woodland that is dominated by coast live oak trees. Complete surveys of the site that were used for this analysis were conducted prior to the fire, between April 23, 1999 and November 18, 1999, and the fire has no bearing on the assessment of project impacts or the MHPA boundary adjustment. The surveys conducted in 1993 by Michael Brandman and Associates were used for the mitigation parcel of the Sycamore Estates sub-project site, where no development or impacts are proposed.

Photo Exhibit 1: Fire area in the Sycamore Estates Development Footprint



4. A. Beeler Creek Corridor: Hydrology impacts indicate that developed site runoff will be directed into Beeler Canyon Creek. Maybe that sounds good; to follow the Best Management Practices (BMPs) of the City of San Diego, but it is not so good for the flora and fauna of Beeler Canyon. Regionally, our BMPs have produced such storm drain toxicity that we are seriously polluting our canyons and estuaries. The "type" of treatment proposed needs to be analyzed prior to planning to dump into Beeler Creek, since it is such an important resource that effects much more than the City of San Diego? Where is the analysis of the "effectiveness" against expected toxins entering the water table, of the proposed storm drain runoff detention pools and BMPs, and from ground water seepage from the proposed landscaping associated with section P.A. 11? Our domestic water source in Beeler Canyon is well water. Infiltration methods proposed on the Sycamore Estates would endanger our drinking water. How do you propose to keep the toxins out of our drinking water?

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Significant runoff from developed areas of the site would not be directed into Beeler Canyon instead of draining into the appropriate pre-development drainage basin. With a minor exception, developed areas of the site would drain into the same drainage basin post-development as pre-development. The minor exception is a diversion of drainage area from the southerly drainage to prevent runoff from developed areas and non-storm flows from developed areas from affecting sensitive plant species within the southerly drainage. By design, this minor diversion would result in no increase in peak runoff leaving the project site because of the attenuating effect of project retention facilities.

The comment states that "Regionally, our BMPs have produced such storm drain toxicity that we are seriously polluting our canyons and estuaries." In actual fact, it is the lack of BMPs that has resulted in storm drain toxicity. The EIR indicates that the project would be required to employ approved water quality protection measures [also known as Best Management Practices (BMPs)] to treat project runoff for the pollutants of concern to the maximum extent practical prior to discharging that runoff to surface or groundwater resources. This standard is consistent with the Regional Water Quality Control Board's NPDES Permit requirements.

366

See response numbers 151 and 346. A discussion of potential water well impacts has been added to final EIR Section 4.5, HYDROLOGY/WATER QUALITY.

B. Endangerment of wetlands below the Easternmost Sycamore Estates development:

Beeler Creek, just North of this P.A. 11 (see the proposed section of the project description in Figure 3-1, Precise Plan, Land Use Plan), during a normal rain year, retains water at the base of this hill until June. I use this part of Beeler Creek to take water samples into the local schools for environmental science in hydrology. This is a primary watering spot for wildlife from all over the Sycamore Estates sub-project area. On that hill is a primary nesting area for Raptors and home to many animals at various times. As you can observe from the animal tracks, scat, trails and bones scattered across these hills leading across the city of San Diego parcel, this a stopping place for the North/South movement of large mammals and birds. Any pollution put into the ground water from that P.A. 11 development would have consequences for the wildlife of the region that use that Beeler Creek watering area, and for smaller critters specifically in Beeler Canyon. A statement by the draft EIR (that they will use City of San Diego best practices) will not serve as an adequate environmental analysis for this critical issue. A real study should be done, to determine the type and quantity of toxins (after treatment) that you intend to "filter" into our wetlands and drinking water. The EIR is silent on these issues.

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C. Wildlife Movement through Beeler Canyon: Section 4.3, Issue 2, regards the Interference of movement of wildlife species. The draft EIR indicates that wildlife movement South of the Calmet Quarry is unlikely given the project design. They propose that wildlife will have to travel North of the Quarry, which the report indicates is 1,000 feet wide. Have you seen the nature of this 1,000-ft? One would not consider much of it passable. Take a more serious look at this section of the plan. The developer should move the road, which is planned for the Sycamore Estates sub-project, further to the South of the quarry. The developer should then create a wildlife corridor between the Sycamore Estates access road and the Southern edge of the quarry. We think other corridor alternatives, more appropriate for wildlife, could be presented.

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The Planning Area 11 development area would not pose a greater potential for pollution of surface or groundwater resources than other development areas. EIR Section 4.5, HYDROLOGY/WATER QUALITY, indicates that runoff from all development areas would be required to be treated for pollutants of concern to the maximum extent practical prior to discharging that runoff to surface or groundwater resources. Regarding the statement "any pollution put into the ground water from that P.A. 11 development would have consequences for the wildlife of the region that use that Beeler Creek watering area," it should be understood that human use of the area surrounding Beeler Canyon for decades has resulted in pollutants percolating into the ground water, as scientific analysis of the groundwater shows. Protection of water resources involves, along with reasonable and effective regulatory action, the application of sound scientific principals and well-designed protection measures. The EIR indicates that all of these would be required of the project and would adequately address the potential for impacts to water resources.

No raptor nests were observed during project surveys on Planning Area 11, and none are expected given the lack of appropriate substrates (trees or rock outcrops) within Planning Area 11. See response numbers 322 and 325 regarding wildlife movement.

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See response numbers 151 and 346.


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See response numbers 57 and 58. The corridor is considered adequate for wildlife movement. Both the Poway Habitat Conservation Plan and the City of San Diego MSCP identify this area as a regional wildlife corridor. Moving the road to the south would create significant grading impacts from both a habitat and visual standpoint, and would not significantly improve wildlife movement through the area.

5. **Effects found not to be Significant:** In the executive summary, the conclusion was that "light and glare" did not have potential to have adverse effects. Light and glare are problems with other real estate developments in sensitive wildlife areas. Why would it not be of concern here? At Earth School, we study wildlife in Beeler Canyon, and often at night, thus we are particularly sensitive to this issue. We expect that precise measures to counteract this should be addressed in the final version of the EIR.

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Thank You for the Opportunity to Comment



Randolph Howell, Ph.D.
Director of Earth School

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See response numbers 318 and 349.

LETTER OF COMMENT

January 15, 2001

Lawrence Monserrate, Environmental Review Manager
Planning & Development Review Department
City of San Diego
1222 First Avenue, Fifth Floor
San Diego, California 92101

Re: Comments on Draft EIR, Rancho Encantada Project (LDR No. 99-1094, SCH No. 2000011051)

Dear Mr. Monserrate:

Please accept these comments on the draft EIR for the proposed Rancho Encantada project. I am submitting these comments as a private individual, not as a representative of any community group. Related to my expertise and ability to perform this review, please see the attached resume

These comments find that substantial portions of the draft EIR as issued need revision and amendment, and substantial shortcomings in the existing draft document exist, to the point where a revised draft EIR should be prepared and issued for new public review and comment. Amendment of the project as proposed may also be necessary. I hereby request that a revised draft EIR be so prepared. Should the City determine not to issue a new draft EIR, pursuant to CEQA Guidelines Sec. 15089 I hereby request that an explicit period of time not less than 30 days be provided by the City for the public and those making comments on the draft to review the proposed final EIR, prior to any public hearings or formal consideration by the City of the EIR or the project.

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Please notify me when responses to comments are available, and forward to me responses and the proposed final EIR document.

Schools & School Impact Analysis (pp. 4.11-7 through 4.11-10)

The draft EIR analyzes schools impact using 1999-2000 school enrollments to compare against the added enrollment of the project houses. Year 2000-2001 enrollment levels are now available to provide a more accurate current-year impact analysis. These more current enrollment figures should be presented.

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More importantly, other geographic areas within the Poway Unified School District are yet to be developed under their own existing planning and zoning designations. It is misleading and incorrect to exclude from analysis the already-planned and zoned generation from these other undeveloped and underdeveloped areas. (In fact, CEQA Guidelines, Sec. 15130 paragraphs (a), (b) and (d) require the cumulative impact consideration of these other geographic areas.) The draft EIR must be redone in this section to analyze project impact not only in terms of current-

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RESPONSE

371 Regarding the request for recirculation of the EIR, please see response no. 102. The first public hearing on the project cannot be held until at least 14 days after the EIR has been finalized. The actual hearing date will depend on the docket times available and will be subject to public notice.

372 See response number 217.

373 See response number 218.

year schools enrollment, but currently-planned buildout enrollment as well. This is likely to disclose a more significant impact from the proposed project.

373

P 4.11-9 top paragraph, states that "the conveyance of [an elementary school site] to the Poway Unified School District would reduce the project's cumulative impact on elementary school capacity to below a level of significance." This statement at best is incomplete and misleading. The conveyance of land alone for a school does not provide for construction of the school, provision of start-up school materials, hiring and placement of personnel, and year-after-year continuing operating costs. The draft EIR must present whether these additional school costs will be met by the project before concluding no significant impact. This must be corrected in the draft EIR.

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In the following paragraph of the draft EIR it appears that this kind of analysis, limited to the construction of school facilities only, begins to be presented. The draft EIR does not assess costs and impacts related to ongoing school operations. This impact must be assessed. This paragraph further concludes that, since the proposed project will pay "mitigation fees," that this project's contribution of cumulative impact will be fully mitigated. While there is a general discussion of types of fees which might apply, these appear to be limited to facilities construction fees, only, again, the costs of school operations is excluded. Further, there is no clear definition of which and/or how much of the generally-discussed construction impact fees will be required to fully mitigate impact from this project.

In telephone discussion on Nov. 29, 2000, with Sandy Burgoyne, Poway Unified School District, and confirmed by telephone on January 3, 2001, it was disclosed that the school district to date is still involved with "negotiations" with the Sycamore Estates developer, only, on the amount(s) of impact fees to apply to Sycamore Estates. Thus, full mitigation of Sycamore Estates' cumulative impact is not yet defined, and cannot be presented in the EIR as fully mitigated. Further, school district "negotiations" with Montecito as to mitigation of its impact had not even begun as of Nov. 29. These negotiations must also be completed, and full mitigation defined, for schools construction and operation, before the EIR can conclude full mitigation of schools impact.

The draft EIR implies that provision of an elementary school campus on this project site is a necessary objective (draft EIR page 3.1). However, in her Nov. 29 telephone discussion Ms Burgoyne disclosed that the Poway Unified School District does not require that the Rancho Encantada project provide land for an elementary school on this project site. The school district can instead identify impact fees which will compensate for acquisition of a differently-located school, or expansion of other already-existing or planned schools. This fact is not disclosed in the draft EIR, but should be, as project alternatives which do not include a school campus can be more accurately analyzed for related traffic impact reduction, as well as reduction of other related impacts such as air quality. (In oral presentations to the Scripps Ranch community, the project applicants have represented that their project homes would generate 75% of the enrollment of the on-project elementary school. However, the figures of the draft EIR [p. 4.11-8 et seq] indicate that elementary enrollment generated by this project would total 439 students at build-out. Per Ms. Burgoyne, the planned enrollment capacity of a Poway Unified School District elementary school is 770 students, the draft EIR cites up to 800 students. Thus, this project is projected to generate about 55% of school enrollment at build-out. This difference may alter projections of traffic trips projected to be generated by the school use as part of this

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In 1998, the California Legislature adopted Senate Bill Number 50 (Stats. 1998, ch. 407) and the California voters approved Proposition 1A. Together, SB-50 and Proposition 1A reformed the methods of school construction financing in California. Through the State School Building Lease-Purchase Program, California has provided much of the money for school districts to buy land and to construct, reconstruct, or modernize school buildings in the K-12 system. In order to receive money under Proposition 1A, school districts must meet certain requirements. Districts receive a higher priority for state funding of a project if they provide 50 percent of the project cost with local funds. Local school districts raise funds for school buildings in three main ways: 1) Local General Obligation Bonds; 2) Special Local Bonds (Known as "Mello-Roos" Bonds); and 3) Developer Fees. State law authorizes school districts to impose developer fees on new construction. These fees may be used only for construction and reconstruction of school buildings. The developers of the proposed Rancho Encantada project must pay the statutory mitigation fees. Under California Government Code §65995(h), payment of the school mitigation fees required under SB-50 constitutes full and complete mitigation of project-related impacts on the provision of adequate school facilities. California Government Code §65996(b) prohibits public agencies from using CEQA to deny approval of a project based on the project's impacts on school facilities. Thus, it is not relevant that the precise amount of school mitigation fees has not yet been determined. Moreover, a projection of future operation costs for schools is beyond the scope of this EIR.

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See response number 220.

project as proposed) Project objectives as presented in the EIR (p. 3-1 and elsewhere, including in alternatives analyses) should analyze the exclusion of a school campus on site

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Project Description (pp. 3-1 through 3-34)

P. 3-1, Sec. 3.1, the draft EIR presents the "overall goal" of the project "to provide a variety of single-family detached and affordable multi-family attached residential units in a manner that is generally consistent with applicable plans, policies and regulations" (emphasis added). Why should the goal be to be generally consistent? Why not be as consistent as possible or practicable with applicable plans, policies and regulations? The draft EIR, in fact, presents three project alternatives which are more consistent with applicable plans, policies and regulations, and (see below) there are likely other reasonable alternatives which are even more consistent. This should be corrected in the draft EIR

376

P. 3-2, third full bullet paragraph from the top: A specific project objective is described, to "provide public facilities, infrastructure, parkland and institutional land uses necessary to service the future residents" (emphasis added). This implies and gives the reader the idea that all aspects of public facilities and institutional land use proposed in the project are necessary. However, as seen above, the proposed elementary school as part of the project is not necessary. In fact, locating an elementary school here likely increases school-related traffic impacts rather than locating the school closer to most of its student generation. Accommodating the school within the project appears to reduce the size of the public park proposed, making it infeasible to provide space for the most needed of park functions in the Scripps Ranch/Miramar Ranch North area, active recreation on larger playing fields. Finally, no where is it demonstrated or supported that the proposed two "institutional" land use pads of this project are necessary to serve project population. In fact, it is unclear in the documentation specifically what land uses are to be allowed on these pads. This project objective should be stricken or revised in a revised draft EIR.

377

P. 3-2, Section 3-2, Precise Plan: The second paragraph states that, "the guidelines included in the Precise Plan are conceptual in nature and are subject to refinement and modification during the PRD permit and Tentative and Final Map stages of project development." However, the proposed project includes not only a general "precise plan," but also fully-developed subdivision maps, planned development applications, and a development agreement, simultaneously. What is the purpose of having a general "precise plan" at this time, when fully detailed development applications are already proposed and submitted as part of the same project? It appears that the precise plan is superfluous and will have no practical effect, as implementation applications, normally subsequent to a precise plan, are already proposed. The EIR should address this issue and clarify what, if any, practical purpose the precise plan is in this context.

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P. 3-3, top paragraph: This states that "the overall Precise Plan density for the Rancho Encantada project site is approximately 0.35 dwelling unit per acre (941 units maximum / 2685 acres = 0.35 du/acre.)" This figure and calculation are totally false and misleading. This calculation includes the 248 acre City-owned parcel, which is required to be set aside as open space. Including this parcel in calculating or yielding density appears intended to give a public

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376 See response number 119.

377 The word "necessary" has been removed. The EIR appropriately evaluates the proposed project and its related traffic impacts, including the provision of an on-site elementary school. Per the requirements of the City's Parks and Recreation Department, the provision of a 4.0-net-acre public park site adjacent to the proposed elementary school site would reduce public park impacts to below a level of significance. If the elementary school site was not developed with school uses, the size of the park would be increased to 8.05 net acres as required by mitigation measure 4.11-2. In other words, with or without the proposed school site, park impacts would be fully mitigated to below a significant level. The provision of "active recreation on larger playing fields" in the Scripps Ranch/Miramar Ranch North areas and outside of the proposed project boundaries is beyond the scope of the proposed project. Also see response numbers 120 and 220.

378 The comment is a planning-related issue which does not affect the adequacy or completeness of the EIR. For information purposes, the Precise Plan is proposed as the project's long-range planning document. Implementing actions such as Planned Development Permits and Tentative Tract Maps may be processed either concurrently with consideration of the Precise Plan or subsequent to approval of a long-range plan. In this case, Planned Residential Development Permits and Tentative Tract Maps are being processed concurrently with the Precise Plan. The EIR appropriately evaluates the impacts that would potentially result from implementation of all of the discretionary actions under consideration.

379 See response numbers 122 and 123.

impression of very low development intensity, and that the developers have voluntarily reduced proposed development. In fact, the City-owned parcel is currently zoned open space, and it is unclear why it is included in this proposed development project at all, except apparently for the purpose of misrepresenting density.

379

Much of the precise plan area including the City-owned parcel and the eastern portion of the site are very hilly, with dramatically steep terrain, not to mention important biological resources. The eastern portion in fact is within the MSCP-MHCP regulatory area, with doubtful ability to be built upon. Presenting a blanket density allowance over every square foot of this area is further misleading, giving the false impression that it would be possible, environmentally desirable, or allowed by regulation to simply bulldoze the entire area as development padding. This is misleading to the public and to City decision-makers alike.

Further, other acreage in the project area will be devoted to other land uses, including the school, park, the institutional land use development pads, and for roadways. 38.5 acres are proposed to be retained as existing building development within the eastern open space area. All this acreage should be excluded from any calculation of dwelling unit density, so as not to be counted twice for land use densities/intensities, and to provide a more true, objective picture of development density.

This portion of the EIR, and any others presenting this purported density figure (e.g. see below), should be re-written to remove any such allusion to this kind of "overall density" of proposed development. Density yield should be stated without including the City-owned parcel, eliminating or discounting the eastern MSCP portion, and stating densities in net instead of gross figures. Anything less is misleading, not befitting the objectivity and purpose of an EIR under CEQA.

P. 3-4, Sec. 3.2.3, Institutional Uses: Saying that uses allowed under this land use category "include, but are not limited to..." is not sufficient disclosure of the specific range of uses which will be allowed under the project precise plan, zoning and development agreements. Somewhere in the draft EIR, there should be a specific listing of uses permitted by zoning and development regulations under this project, or immediate reference to a section of existing City regulation providing such specific range (e.g., specific City zoning provisions). Apparently, there is no specific delineation to date, either as disclosed within the EIR or under the proposed precise plan. Without this specific delineation, both the proposed project and this EIR are incomplete. (For example, traffic analysis cannot be completed without knowing what land uses will be allowed on this acreage.)

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P. 3-4, Sec. 3.2.4, Open Space: Again here, it is misleading to describe this project as "preserving" as open space, that area of 248 acres which is already owned by the City of San Diego as open space, and now zoned by the City under an existing open space zone designation. It is unclear why this acreage is included under this project and its precise plan, at all. This acreage should not be providing any development allowance for the remainder of the proposed project area. Are there any differences proposed under this project, as to what can happen to or be done on this acreage? Is there any different land use regulation or allowance on this acreage, comparing existing planning and zoning to the proposed project? If so, this should clearly be disclosed in the EIR; the EIR should be re-done and re-issued for a new public review period.

381A

380 See response number 120.

381A See response numbers 126 and 127.

P. 3-4, Sec. 3.2.5, *Revegetated Manufactured Slopes*: This section starts, "Exterior manufactured slopes *required* to support development . . ." (emphasis added). This is needlessly misleading. Such manufactured slopes, in their extent and their location, are not *required* to support site development. This is clear in the presentation of several project alternatives which each substantially reduce grading. It is more accurate to say, "Exterior manufactured slopes which the proposed project proposes to create . . ."

381B

Further, between Sections 3.2.4, 3.2.5, and figure 3-1, the reader is given the impression that all areas colored "open space green" on figure 3-1 will be natural, undisturbed open space. The project's proposals for utility connections including water service, sewer service and drainage, as well as other improvements, will heavily impact the "open space" periphery of development pads. Grading to install such facilities and permanent improvements to maintain access to such facilities such as access roads, will largely compromise surrounding open space, including MSCP-MHCP designated open space. This should be clearly described in Section 3.2.4, and shown on the map figure 3-1. The acreage of open space land to be so compromised should be disclosed.

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P. 3-5, figure 3-1: Again, the presentation of dwelling units per acre figures in the Totals row of the "land use abstract" table, is inaccurate and misleading. Not only should the 248 acres of the City-owned parcel be excluded from this calculation; acreage devoted to other land uses, including institutional, the school and park, the 38.5 acres devoted to existing buildings, and the project roadways, should also be excluded, so as not to be counted towards more than one land use. Excluding the MSCP open space area will yield a further, substantially-increased true density figure. This page and similar references in the draft EIR need to be corrected, and a revised draft EIR circulated for public review.

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P. 3-9, *Water Plan and Sewer Plan*: As described here, water and sewer lines are proposed over open space areas, including MHPA-designated open space preserve. Easements over such lines, and "a 15 foot wide all-weather maintenance [permanently paved] road" will compromise this open space. Presumably, grading will also be necessary to lay the lines, and make easement access roads drivable. The draft EIR should disclose specifically how much grading is necessitated, how much acreage of open space area is so compromised, and the linear distance of such lines and roads.

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Pp 3-10 and 3-15 and figure 3-6, *Drainage Plan*: Again, substantial utility facilities off-site of the residential padded areas and within the project "open space" areas, will substantially compromise open space integrity. Not only drainage lines/swales, but also graded detention and desiltation basins are proposed. Twelve desiltation and detention basins are indicated on figure 3-6 within open space. However, the extent of grading and brush clearance specifically to accommodate these facilities is not indicated on any graphic, notably, figure 3-1, and a separate delineation of grading (volume and area extent) for these facilities is not disclosed. This should be, including those volumes and extents in open space.

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P. 3-32, Section 3.8, *Development Agreement Amendment*: This brief paragraph is wholly inadequate as a clear description of the nature of the amendment of an existing development agreement. What are the terms of the existing agreement, and how specifically does the proposed project propose to change terms and circumstances for the site and the City? None of

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381B See response number 128.

382 See response number 129. A footnote has been added to Figure 3-1 which states that utility improvements and trails are included in the open space acreage.

383 See response numbers 102, 122, 123 and 130.

384 See response numbers 129 and 134.

385 See response number 136.

386 See response number 141.

this is currently presented, in this chapter, Project Description, in Chapter 2, Environmental Setting, where the nature of the current development agreement should be presented, or in Chapter 4, Impact Analysis. This should be fully described in a revised draft EIR, made available for a new public review period.

386

Alternatives Analysis (pp. 9-1 through 9-48)

P. 9-1, fourth paragraph: The entire Alternatives Analysis section of the draft EIR assumes that all other project alternatives should be assessed as though old City development regulations would apply. There is no explanation provided for the reason for this analysis assumption. In fact, this paragraph goes on to admit that any new development proposal would be subject to the City's new regulations. This analysis assumption appears to be made without merit. All of the alternatives analyzed in this section should therefore be revised to instead assume the City's new regulations. This should be done through a revised draft EIR, subject to new public distribution and review.

387

Pp. 9-1 & 9-2, Section 9.1.1, Phase Shift Alternative: This section, presenting an alternative "considered but rejected," presents a phase-shift alternative as one where "the land use plan would designate more intense use of the land than that proposed by the Project. . . it is also likely that more land area would be disturbed under the Phase Shift Alternative as compared to the proposed Project and that the MHPA would not be expanded . . ." [emphasis added] For this reason, the draft EIR rejects and does not analyze a phase shift alternative.

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There is no justification for these assumptions in the record. (As an aside, it is difficult to realistically accept a more intense use of this land than this project proposes. It is challenging that the proposed project, in fact, qualifies for consideration without a phase shift; the intensity and urban-level of development proposed appears substantially beyond the level of land use described and intended without a phase shift in Council Policy 600-29.) The presumed value of land proposed to be added to MHPA area by this project is substantially limited in reality, by the many disturbances to this area which this project includes (see above). More important, a mere assumption without justification that phase shift development must be more intense, disturb a greater land area, and/or entail more impacts than the proposed project, is invalid and is not supported by CEQA. No evidence is presented to support this presumption, and its acceptance as a mere opinion is not supportable. The draft EIR should be revised to include consideration of any phase shift alternative. A new draft EIR should be provided for new public distribution and review.

389

Pp. 9-2 & 9-3, Section 9.1.2, No Precise Plan/Alternative Access Alternative: It is interesting to note that this section presents as a "project alternative, considered but rejected," the original project applications which the proposed Project still is tracking under. As described in the draft EIR, the proposed project is requested to continue to have old City development regulations (the RPO instead of the ESL) apply, because the original applications were "accepted as complete" and constitute the application submittals under which this Project is now being considered by the City. This section goes on to describe the substantive differences between the proposed Project, and the original applications.

This appears to describe a situation where the applicants wish to have their cake, and eat it, too. Since the applicants chose to substantially modify their project, and chose to delay any

387 See response number 234.

388 See response number 117. The State CEQA Guidelines state that the EIR should also identify any alternatives that were considered by the lead agency but were rejected as infeasible during the scoping process and briefly explain the reasons underlying the lead agency's determination. Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts. The discussion of the Phase Shift Alternative in the Rancho Encantada EIR is consistent with the permissive requirement in CEQA that an EIR should contain only a brief, general discussion of alternatives considered but rejected during the scoping process. Section 9.1.1 of the EIR explains that the Phase Shift Alternative was rejected because it would cause a substantial increase in environmental impacts as compared to the proposed project. In other words, the Phase Shift Alternative would be infeasible due to its inability to avoid significant environmental impacts. The commentor challenges the conclusion that the Phase Shift Alternative would be more intense, disturb a greater land area and entail more impacts than the proposed project. As explained in response number 117, the proposed project would result in a zoning change from an industrial zone allowing intense development to an agricultural zone that is less intense. Pursuant to Council Policy Number 600-29, land within a Future Urbanizing Area is generally to be maintained as an "urban reserve" and is subject to certain development options without a phase shift. By contrast, development rights are increased upon a phase shift to the Planned Urbanizing Area. For instance, Council Policy Number 600-29 states: "During the planning period, however, some land in this [Future Urbanizing] area may need to be shifted to the Planned Urbanizing Area in order to meet presently unanticipated demands to enable the land market to operate more freely." In addition, the commentor challenges the conclusion that the proposed project qualifies for consideration without a phase shift. This point is addressed in response number 117. The comment regarding the presumed value of the land proposed to be added to the MHPA area by the proposed project is noted.

389 Comments are noted. Application review and processing by the City of San Diego causes changes in project design as applicants respond to changes and requests made by the City and others on their proposed projects. The applications under consideration by the City and evaluated by the EIR reflect plans that have undergone several cycles of City review and resultant application modifications by the applicants. Once an application is submitted to the City, it is not required to be withdrawn as a result of minor or moderate design changes. Thus, the EIR is correct in noting that the subject applications were accepted as complete by the City of San Diego in 1999 and that the applications are being processed under the pre-2000 City Municipal Code. It is appropriate to include the original application design as a project alternative "considered but rejected" because the design was submitted to the City for consideration, but was rejected because the adjacent jurisdiction (City of Poway) stated that they would not allow primary access to the project through their city limits. Also see response number 152.

City consideration or processing under the original proposals while they themselves fashioned a precise plan and altered projects for City consideration, and since this section of the current draft EIR presents the original applications as a different project, "considered but rejected," it appears clear that what is now proposed is in fact a new a different project submittal than the original applications. There is no reason for the proposed project to be considered under old City regulations, and the currently-adopted regulations should apply for both City consideration, and EIR analysis. The draft EIR should be redone accordingly, and provided for a new public distribution and public review.

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This project alternative would provide alternative automobile access to the north onto Beeler Canyon Road, as opposed to funneling all traffic out to Pomerado Road at a single access point. The possibility of some impacts from a specific roadway connection as described is given, but is not weighed against possible reduced traffic impacts onto Pomerado. Three other project alternatives in the alternatives chapter of the draft EIR also provide for some alternate access onto Beeler Canyon Road. However, there are other possibilities for roadway connections north into Poway, different from that described here. (Note, the other draft EIR comments provided by the Scripps Ranch/Mitama Ranch North Community.) The project draft EIR alternatives section should be revised to specifically include a project alternative with alternate automobile access north into Poway as suggested by the Scripps Ranch community comments. A new draft EIR should be provided for new public distribution and review.

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P. 9-3, Section 9.1.3, Alternative Sites: It appears that this section limits consideration of alternative sites to areas within the City of San Diego, and only to certain areas as described. There is no reason for this limitation of alternate area consideration; available acreage within or near the City of Poway or in the vicinity of Escondido, for example, may and should be considered. Further, it appears that this section limits consideration to land sites of approx. 2,600 acres. The only reason the current proposed "project site" is this large, is that it artificially includes 268 acres of City-owned open space (note above); and that a substantial portion of the project gross acreage is within the designated MSCP/MHPA planned ecological preserve. The number of dwelling units and other land development proposed by the current project can easily be achieved by land of substantially smaller size. It is totally unnecessary that alternate project sites be 2,600 acres in area, and alternative site consideration should not be so limited. (Further, simply because the current project applicants "do not [currently] own any other parcels of land in the proximity of the project site," [which is also not supported by any evidence in the record], is no reason to not consider alternative sites. These current applicants did not originally own this site, and it is not clear that they in fact now own the current site in fee.)

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Thus, there are no CEQA-supported reasons for excluding alternate project site analysis from consideration in this EIR. A new draft EIR should be prepared which includes alternative site analysis, provided for new public distribution and review.

Pp 9-4 - 9-12, Section 9.2, No Project Existing Zoning Alternative. This section attempts to present an alternative where full site development would happen under current zoning designations (suburban residential and industrial), designated as a "no project" alternative. CEQA Guidelines Sec. 15126.6(c) defines the CEQA no-project alternative. Subsection (e)(2) says "the 'no project' analysis shall discuss the existing conditions [of the site] at the time the notice of preparation is published, or . . . at the time environmental analysis is commenced, as well as what would be reasonably expected to occur in the foreseeable future if

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See response numbers 152, 153 and 154.

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CEQA only requires a detailed analysis of alternative sites in limited circumstances. State CEQA Guidelines provide that the key question and first step in analysis is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR. Section 9.1.3 of the Rancho Encantada EIR states the conclusion that no feasible alternative sites exist for the proposed project. The EIR also explains the reasons for this conclusion, as required under State CEQA Guidelines. The EIR states that "[p]otential sites were evaluated according to six primary criteria: 1) existing land use and available urban infrastructure; 2) land use designation and zoning; 3) environmental constraints; 4) availability for private development; 5) accessibility; and 6) ownership." The EIR lists several potential alternative sites within the City. None of the potential sites met the specified criteria such that the significant effects of the project would be avoided or substantially lessened. Therefore, "[n]o alternative sites were considered reasonable alternatives under the provisions of CEQA." CEQA does not require any more detailed explanation of the alternative project sites than contained in the EIR. Further, there is no authority under CEQA to support the commentator's proposition that the EIR is required to examine a broad range of properties in varying sizes and various locations outside the City limits. Finally, under State CEQA Guidelines, it is relevant in assessing the feasibility of alternative sites, and particularly the economic viability thereof, that the applicant does not own other parcels of land in the proximity of the project site suitable for development of the proposed project.

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See response number 237.

the project were not approved, based on current plans and consistent with available infrastructure and community services" [emphasis added] The current draft EIR does not present existing site conditions (mostly non-developed) as part of its no-project presentation. Further, what this section presents as "no-project" development is not reasonable, nor does it appear feasible. This section itself admits that this development scenario (p. 9-7, second paragraph) "would result in land use conflicts with Council Policy 600-29/Proposition A associated with the development of manufacturing uses. . . ." Additionally, it is again challengeable that the level of land use outlined here would be permitted without a phase shift, and therefore does not qualify as land use consistent with current plans. On both these grounds, this scenario is not reasonable or feasible under current plans and regulations.

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In any case, there is no evidence in the record that industrial site development is reasonable. The existing site industrial zoning is an old hold-over, inconsistent with City planning including the FUA limitations on this site. (This zoning has simply never been reviewed for its inconsistency and considered for replacement.) Nor is it expected that such industrial development would make economic sense, given this site's location remote from high-capacity access and lack of infrastructure to support it. (In fact, the draft EIR, in presenting a proposal to extend sewer service to this site some two miles in order to support the residential development proposed, presents evidence that infrastructure is missing to support the level of industrial use outlined in this section.)

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Ref. CEQA Guidelines Sec. 15126.6(f)(1), Feasibility: "Among factors that may be taken into consideration when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations. . . ." There is no evidence in the record that the industrial scenario outlined here meets any of these criteria. On the contrary, common sense dictates the opposite. The draft EIR should remove this current "no project" scenario, and be redone with one which follows CEQA guidelines, including the presentation of existing site conditions. If a development scenario is included, it must be consistent with the substantially limited land use options reasonable considerable under current FUA designation.

P. 9-6, as noted above, there are no reasonable grounds for assuming that the outline here of residential and industrial use is reasonable or feasible. Additionally, after dedication of open space on the eastern edge of the site as required for MHPA conservation, there are no grounds presented to support or justify the level of intensity presented for the Sycamore Estate sub-portion. Consequently, the analyses following of presumed impact cannot be accepted as justified. Particularly, the level of traffic impact outlined for this alternative on pp. 9-9 and 9-10, and presented as contrast to the proposed project, cannot be accepted. There is no evidence in the record that this level of industrial development, particularly, is either reasonable or feasible at this site. Further, the rate of traffic generation presented for industrial (200 ADT/acre) is the highest per-acre generation rate for industrial development provided by SANDAG for San Diego Region traffic generation rates. There is no information in the record to support the presumption of this highest generation rate as contrast to the proposed project.

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Pp. 9-13 - 9-20, Section 9.3, No Project Mineral Resource Extraction Alternative: This section attempts to maintain the Montecito portion of the first "no project" alternative and add to it, a decades-long aggregate extraction use. The time-frame outlined for mineral extraction is 75 years. Note above, the same shortcoming regarding a lack of existing-conditions discussion applies to this "no project" alternative discussion as it does to the preceding, and it may again be

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See response numbers 117, 266 and 267. The No Project - Existing Zoning Alternative falls within a reasonable range of project alternatives under the "rule of reason" described in the State CEQA Guidelines. CEQA does not require an EIR to provide a detailed explanation of why each particular project alternative is feasible. Nonetheless, Section 9.2.1 of the Rancho Encantada EIR explains that the mix of residential and industrial uses as well as the level of intensity under the No Project - Existing Zoning Alternative are consistent with the existing zoning designations for the Montecito and Sycamore Estates sub-project sites. Among other factors, site suitability and economic viability are relevant as part of this feasibility analysis pursuant to the State CEQA Guidelines. The commentator's emphasis on a land use conflict with Council Policy Number 600-29/Proposition A is not a reasonable basis for disregarding this project alternative entirely. There is no indication in the EIR that this land use conflict is significant and unmitigable. Moreover, the EIR explains that the No Project - Existing Zoning Alternative would avoid the significant land use impact of the proposed project resulting from an inconsistency with the Industrial Element of the Progress Guide and General Plan. In this regard, the project alternative complies with the requirement of the State CEQA Guidelines which states that the discussion of project alternatives shall focus on alternatives which are capable of avoiding or substantially lessening any significant effects of the project.

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See response numbers 117, 239, 266, 267 and 393. Section 9.3 of the Rancho Encantada EIR explains that the No Project - Mineral Resource Extraction Alternative would avoid the significant cumulative natural resource impact of the proposed project as well as the significant land use impact of the proposed project related to inconsistency with the Industrial Element of the Progress Guide and General Plan. In this regard, the project alternative complies with the requirement of the State CEQA Guidelines in that the discussion of project alternatives shall focus on alternatives which are capable of avoiding or substantially lessening any significant effects of the project. The commentator questions the feasibility and reasonableness of the No Project - Mineral Resource Extraction Alternative. As the EIR explains, the Montecito sub-project site would be developed in the same manner as discussed for the No Project - Existing Zoning Alternative. The EIR also explains that mining activities on the Sycamore Estates sub-project site would be permissible after preparation of a Reclamation Plan. Among other factors, site suitability and economic viability are relevant as part of this feasibility analysis pursuant to State CEQA Guidelines. The approximate extent and depth of the mining area for this alternative is based on the approximate amount and extent of the underlying aggregate resource.

challengeable whether an intensive and extensive aggregate mining and processing operation as outlined is consistent with current regulatory limitations under the FUA.

Pp. 9-13 & 9-14, Sec. 9.3.1 This alternative description assumes that 970 acres would be subject to aggregate mining, in a swath of 250 acres "at any given time". In addition, it is simply assumed that the use would additionally include on-site process plant operations, and an asphalt or concrete batch plant. It is further simply assumed that a depth of mining of 400 ft. would be allowed.

There is no information in the record and no justification provided to support this extent of assumed mining and processing. Even beyond the limitations of the FUA, since the approval of this use would be subject to a conditional use permit, it is just as, if not more reasonable to presume that a substantially more limited area would be subject to mining disturbance, that an on-site processing and batch plant would not be approved, and that depth of mining would be restricted. The lack of justification for these assumptions also removes from justification the described daily volume of export, the visual quality/landform alteration impacts, biological resource impacts, and the transportation impacts based on ADT on following pages.

This current "no project" alternative should be removed from the draft EIR. A revised draft should be produced, and provided for new public distribution and review.

P. 9-21, Sec. 9.4.1, Description of the Reduced Project Alternative: This alternative includes the siting of an elementary school. Note comments above, the provision of a school campus as part of this project is not required by the Poway Unified School District, and is not required to reach necessary project objectives. Since this alternative is provided to reduce project impacts, it appears logical to eliminate the school campus from this alternative for potential further impact reduction.

Pp. 9-27 and 9-28, Sec. 9.5.1, Description of the Reduced Grading Alternative: It is not explained why "it is assumed that several access points would be established with Baeler Canyon Road," although the reader can guess that this is for the purpose of reducing required grading. This should be clearly explained, rather than just assumed. Further below, "it is assumed that 50 % of the lot area would be disturbed by grading and construction . . .," and on page 9-28, "the 50% impact assumption has been chosen as a worst case scenario; however, based on topographic constraints it is likely that 35-30% of each lot would be impacted. If this alternative were to be implemented, actual impacts would be assessed on a lot-by-lot basis at the time an application was made to develop each custom home site." It is not necessary to make a 50% impact assumption or to wait until each lot develops with a custom home to assess or limit grading impacts. Lot-specific grading limitations can be applied through custom development limitations, for example, by easement restrictions to which the City would be a party; through PRD regulations; or through specific plan regulations, or any combination. Such limitations can be built in to a project from the front-end. This project alternative should be so revised and grading impacts re-assessed, for example, at an average 35% grading impact level.

P. 9-30, Sec. 9.5.2, Reduced Grading Alternative land use impact assessment: It is stated that each project would be subject to the RPO. However, any new project submittal would, presumably, be subject to the new ESL regulations. There is no apparent reason that it should be assumed that RPO instead of ESL regulations should apply, and impact analysis should take this into account. It is further stated, "depending on the placement of each home on each lot, potentially significant impacts could occur to wetlands and steep slopes in excess of the RPO

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See response number 240.

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See response numbers 241 and 242. A 50% impact assumption represents a worst-case scenario. It is recognized, however, that a smaller impact area such as 35% as suggested by this comment could occur. Regardless, the Reduced Grading Alternative as described in the EIR complies with State CEQA Guidelines by providing the decision-makers with sufficient information to allow meaningful comparison with the proposed project.

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See response number 242.

encroachment allowances . . .” Again, however, there is no reason why a project submittal for this alternative could not identify and prohibit such encroachments from the beginning. This alternative land use impact assessment should be so revised. At the end of this paragraph, it is stated that “from a land use standpoint, [this] Alternative would not be preferable to the proposed Project because homes would not be clustered.” Why? As described, this alternative will reduce impacts below the level of the proposed project, irrespective of the level of “clustering” the proposed project includes. The regulatory purpose of clustering is to reduce impacts. If this alternative reduces impacts more than the proposed project, then the proposed project’s level of clustering, just for “clustering’s sake,” cannot be preferred. This incorrect assessment should be removed from the draft EIR.

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Pp 9-34 through 9-40, RPO Consistent Alternative: Again, since a new project application would be submitted for this alternative, there appears to be no reason why the ESL would not apply, the draft EIR and this alternative should be so revised. This alternative again proposes to include a school on site, described as “needed,” however, note above, a school on site is not needed as part of any project on this site. This alternative can eliminate the school development and assess related further reductions in impacts.

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This appears to be the only alternative where roadway bridging is included to reduce impacts. However, there does not appear to be a reason why the proposed project, and any other alternative, cannot also include roadway bridging to reduce impacts. This should be reflected in a revised draft EIR.

In fact, there appears to be no reason why a new project alternative cannot be crafted, one which reduces impacts more than any other. In the current draft EIR, three alternatives are found to be environmentally superior to the proposed project: the “reduced project alternative,” the “reduced grading alternative,” and the “RPO consistent alternative.” There appears to be no reason why the environmentally-advantageous elements of all three of these cannot be combined in a most-environmentally advantageous alternative. This alternative would include reduced numbers of dwellings, strict RPO/ESL consistency, and regulatory-imposed grading limitations. Elimination of the proposed elementary school campus, roadway bridging throughout to the maximum feasible degree, and alternative circulation access north to Foway should be included for consideration. The creation of such a new project alternative for inclusion in a new draft EIR is fully consistent with the letter and the intent of CEQA, ref. State CEQA Guidelines Sec 15126.6, paragraphs (a), (b), (c) and (f). It seems clear that such a new alternative presents the possibility of optimal reduction in impacts, providing a superior reasoned choice for consideration by decision-makers and the public. The draft EIR should be redone to include such alternative, and re-released for new public review and comment.

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Miscellaneous Other Comments / Areas of Impact Analysis

At the December 7, 2000 Scripps Ranch Community Planning Group meeting, the applicants for Rancho Encantada unveiled what they called a breakthrough set of proposals for street/traffic improvements on Pomerado Road at the I-15 freeway. Apparently these had been reviewed and, reportedly, endorsed to some extent by City of San Diego staff. Contrary to the findings of the draft EIR, the applicants describe these improvements as not only fully mitigating what the draft EIR finds are unmitigable traffic impacts of the project, but actually bringing net improvement of

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398 See response numbers 240 and 243. The bridge shown in the RPO Consistent Alternative would avoid impacts to approximately 0.01-acre (338 square feet) of wetlands on the Sycamore Estates sub-project site. The proposed project fully mitigates impacts to wetlands through on-site creation and enhancement (see mitigation measures 4.3-5 through 4.3-10). As required by CEQA Guidelines, in order to approve or carry out the proposed project, the lead agency would make findings that state specific economic, legal, social, technological, or other considerations make infeasible the project alternatives identified in the final EIR.

399 Pursuant to State CEQA Guidelines, an EIR need not consider every conceivable alternative to a project, and the Rancho Encantada EIR sets forth a range of reasonable alternatives. The additional alternative suggested by the commenter is noted. Also see response number 102.

400 The improvements referred to by this comment would not fully mitigate the proposed project’s direct and cumulative transportation impacts. The mentioned improvements were initiated by the project applicant as a result of community group meetings and are being explored by the applicant with Caltrans. Any such measures are not intended to replace or supercede mitigation measures identified by the City of San Diego in final EIR Section 4.6, TRANSPORTATION. The applicant has indicated to the City that their coordination with Caltrans will continue.

traffic conditions. It seemed that the applicants unveiled these proposals as a means of encouraging the community to endorse the Rancho Encantada project

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However, these proposed improvements apparently do not appear in the draft EIR, and they are not analyzed either as part of the proposed project, or as traffic mitigation measures. Clearly, if these additional measures are now proposed, the draft EIR must now be redone in its traffic analysis to include these proposals; and must be re-issued to the public for a new public review period.

There is an additional issue which relates to the proposed project as described in Chapter 1 of the draft EIR, to its planning context as described in Chapter 2, and to analysis of its impacts related to land use regulation in Chapter 4. The draft EIR states that the proposed project is consistent with the City's FUA land use regulations, with Council Policy 600-29, and with Proposition A. This is based on summary descriptions of sections of Policy 600-29.

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I have reviewed Council Policy 600-29 in detail, and have reviewed all portions of the City's municipal code referencing the Future Urbanizing Area. It appears clear that, in fact, the proposed project is not consistent with the intent, or the letter of Policy 600-29 and FUA regulations.

I have found no reference in the draft EIR as to responsibility for determination of FUA/Policy 600-29 consistency. However, members of the Scripps Ranch community have been told that a finding made by Gail Goldberg in 1999 was the source of this determination. If this is the case, it appears that Ms. Goldberg's finding was, and is, in error. No reasonable comparison of the proposed project to the intent of Proposition A/Policy 600-29 can lead to the conclusion that this project is consistent, and I hereby challenge this finding.

It is clearly the intent of Policy 600-29 that, without a phase shift, land development under the FUA is to be limited to that which is rural and non-urban in character. The proposed development cannot be understood as anything but urban, in intensity and in land use content. The sheer number of dwelling units proposed, the inclusion of attached apartment units, the inclusion of several acres of "institutional use," and the inclusion of a full-scale public elementary school (up to 800 students enrollment) and a public park, in a suburban pattern with suburban scale improvements, define a project which is definitely not rural, but urban in character. This development is not intended, and would not act, as a rural holding pattern, but would constitute the full, ultimate, urban development of this property.

The intent of Policy 600-29 is that any development under FUA prior to a phase shift be under existing zoning. This project specifically requests a rezone, for the purpose of increasing residential development yield in order to realize the above-noted scale and intensity. A rezone in order to increase development yield is not outlined by 600-29 and is contrary to its intent.

In the preamble of 600-29 it is stated that that "there typically are no community, specific, or precise plans either adopted, in preparation or programmed for this area." The proposed development includes not only a precise plan, but also planned developments, rezonings, general plan amendment, vesting subdivisions and development agreements, constituting the full trappings of final-stage, urban development.

It is clear within 600-29 that proposed development which constitutes urbanization is to be preceded by a phase shift. The finding that no phase shift is required for this project is erroneous. The draft EIR should be amended to recognize this, and require a phase shift prior to the proposed development.

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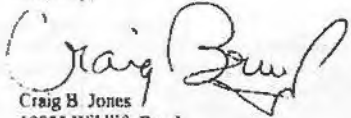
See response numbers 117 and 388. EIR Section 4.1 describes in detail how the proposed project is consistent with Council Policy Number 600-29 and the Managed Growth Initiative. The proposed development on the Montecito sub-project site utilizes the City's PRD ordinance, which allows clustered development at the density permitted by the property's underlying zone. The proposed development on the Sycamore Estates sub-project site complies with the third development option set forth in Council Policy Number 600-29, which allows development pursuant to the Planned Residential Development regulations at a density not to exceed one dwelling unit per four acres for agriculturally zoned land. Thus, despite the commenter's characterization of the proposed project as urban in character, the proposed project complies fully with the limited development options permitted under Council Policy Number 600-29. The commenter challenges the conclusion that the proposed project qualifies for consideration without a phase shift. This point is addressed in response number 117. The rezoning of the Sycamore Estates sub-project site would result in reduced development intensity as compared to the intense uses allowed under the current industrial zoning designation. The proposed rezoning is thus consistent with Council Policy Number 600-29 and the Managed Growth Initiative.

LETTER OF COMMENT

RESPONSE

- Thank you for the opportunity to submit these comments. Please include me in the list of persons to notify when a revised draft EIR is prepared and issued, and/or when responses to comments are prepared. I look forward to the substantive and complete response to these comments.

Sincerely,



Craig B. Jones
10055 Wildlife Road
San Diego, CA 92131
tele: (858) 695-1998

LETTER OF COMMENT

January 16, 2001

TO: City of San Diego
Planning and Development Review
1222 First Avenue, 5th Floor
San Diego, Ca. 92101

RE: Draft Environmental Impact Report
Rancho Encantada Precise Plan

LDR No. 99-1094
SCH No. 2000011053

I am the Owner of a ranch residence on the north boundary line of the above stated development plan. My address is 11319 Creek Road, Poway, Ca. My property is located in the same location as the road named Beeler Canyon Rd. I own 67.2 acres of land there, and have a horse boarding business on that property.

I was shocked to receive and read the above referenced EIR only to discover that my property is not mentioned in the description of what lies north of the Beeler Canyon Rd., yet they mentioned the Poway Business Park and the Cal Mat quarry. Because Beeler Creek runs the entire length of my property, the impact of water flow down this creek will be of major concern to me and the well being of my animals.

I have lived on the property since 1979, and my husband and family first built this house in the 1950s. When this home was built, the road out in front (now known as Beeler Cnyn.) was just a dirt road which in front of this house, skirted southward around the eucalyptus trees which at this time are across the street from me. Sometime later, the road was straightened for more safety for vehicles traveling over this dirt road. This road was paved around 1987 without any measurements being taken as to proper and legal alignment. My understanding was that General Dynamics and Padre Transit Mtx went in together to have the paving done. In paving the road, they followed the lines of the existing dirt road. In the process of paving

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RESPONSE

402 A reference to this property has been added to EIR Section 2.2.1. See EIR Section 4.5 and response numbers 10, 76, 149, 262, 277, 278, 279, 311, 312, 345 and 365 regarding water flow in Beeler Creek.

403 Comment is noted. Potential impacts resulting from proposed use and improvement of Beeler Canyon Road are evaluated in the EIR. Prior to the approval of roadway improvement plans, the City of San Diego will confirm the location of parcel boundaries. Resolution of any right-of-way issues would be conducted as a part of the improvement plan approval process.

LETTER OF COMMENT

the road they put asphalt over the top of one of our property line markers. And it was my understanding from what my husband had told me that the boundary line in front of our house for the City of San Diego was right in the middle of the now existing road. My husband worked 35 years for San Diego Gas & Electric as Gas Service Supervisor, so he was quite knowledgeable about boundary lines, easement property, etc.

Obviously, if one of our property line markers is underneath the asphalt of the street (about 2-4 feet), then the City of San Diego does not own all the surface area of Beeler Canyon Road to the north side.

My property mysteriously does not show up on all the aerial maps shown in the EIR book. It's easy to spot with a big C shape on the hill above my home.

My home only sits 40 feet away from the existing pavement of the road. I could not be safe in my home with the tremendous increase of traffic that this development would incur.

I am on well water here and am very concerned about the probable pollution of our groundwater that would stem from the fact that they want to drain all water from the developments to Beeler Creek. I do not want my well contaminated nor the waters in the Creek, since this is wild animal habitat. It is against the law to pollute streams and creeks, and yet this EIR says heavy pollution would occur from pesticides, fertilizers, automobile residue, etc. and contaminate our creek and possibly the aquifer as well.

There are 12 residences in this canyon who are on wells. There are approximately 40 horses who are kept in this canyon and need good water as well.

The proposed increase in traffic is not feasible, given the gridlock situation on Pomerado Road and Scripps Poway Parkway every morning and every evening. On Creek/Beeler Canyon Rd. because of the animals, joggers, bicyclists, children walking on narrow street, an increase of heavier traffic would be deadly. Also because this is a canyon, the air quality would become cancer causing immediately.

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RESPONSE

404 The aerial photograph included as Figure 2-4 was flown in 1999 and depicts all uses existing at that time, including the referenced address. At the scale shown, it may not be possible for the commentor to clearly pick out individual homes and ranch facilities.

405 According to the project's Traffic Technical Report, there would not be a substantial increase in ADT on Beeler Canyon Road at project buildout that would cause significant safety issues. Without the proposed project, 200 ADT occur on Beeler Canyon Road. With implementation of the proposed project, 411 ADT are projected to occur on Beeler Canyon Road. A sensitivity analysis for 950 ADT also was conducted for Beeler Canyon Road, and no significant impacts were identified (see response number 73).

406 See response numbers 151 and 346. A discussion of potential water well impacts has been added to final EIR Section 4.5, HYDROLOGY/WATER QUALITY.

407 The constraints due to existing traffic congestion were taken into account when identifying background traffic growth and the assignment of project traffic (refer to page 29 of the Traffic Technical Report).

408 See response number 405.

LETTER OF COMMENT

In the EIR, I see no mention of the Doppler Radar that sits on a hill, close to or on the SDGE easement? Why isn't this shown???

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On the matter of wildlife, there are a great number of deer that roam and live up in the area of the proposed development, as well as bobcat, mountain lion, quail, wild turkeys and coyotes. None of these were mentioned in the EIR as existing wildlife and they are indeed here in abundance.

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And so as you can see, in all these ways this proposed development will greatly and tragically impact not only this Beeler Canyon Road area but the hills and wildlife as well. And since I am the only resident with the creek flowing the entire length through my property, I will be impacted negatively with more problems to deal with than most of the other residents here on Beeler Canyon Road.

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I would sincerely hope that future residents of these developments (if this development gets passed) and the construction traffic as well could be made to use access areas by way of the proposed Rancho Encantada Parkway with hopefully a secondary exit to the south, perhaps towards 52 freeway, thereby alleviating the heavy gridlock traffic which we have in this area. There is NO REASON why Beeler Canyon should be used for access at all.

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Sincerely,
Carol Ann Funk
Carol Ann Funk
Creek Road Ranch
(858)695-9195

RESPONSE

409 See response number 232.

410 To date, wild turkeys are not known to be common in this portion of the county. The other species were either identified as observed or expected in the EIR analysis or in Appendices B1 and/or B2 of the EIR.

411 The proposed project would not result in any physical improvements or alterations to Beeler Creek as it flows through the property of Ms. Funk. In addition, no significant impacts to the hydrology of Beeler Creek would occur (EIR Section 4.5). The mitigation measures set forth by EIR Section 4.5 and that would be implemented as part of the proposed project would ensure that water runoff from the proposed project would be treated to the maximum extent practicable in accordance with the federal Clean Water Act and the San Diego Regional Water Quality Control Board.

412 The applicant has agreed to not use Beeler Canyon Road as the primary construction traffic route. Rancho Encantada Parkway would be used as the primary construction access route, while Beeler Canyon Road would be used for secondary access only. Also see response numbers 98, 131, 154 and 169.

LETTER OF COMMENT

RESPONSE

619 221 6261

01-19 01 10:44 FROM:SDCDD MCC ADMIN TO:619 221-6261 PAGE:01

Post-It Fax Note	7671	Date	1-19-01	# of Issues	4
To	Drew Kleis	From	M. Adams		
Go/Dept		Co			
Phone #		Phone #	859-566-2418		
Fax #	446-5499	Fax #			

January 16, 2001

To: City of San Diego
Land Development Review Division

Attention: Drew Kleis

Re: Draft Environmental Impact Report: Rancho Encantada Precise Plan

LDR No. 99-1094
SCM No. 2000011033

The following is intended to note deficiencies in the above-mentioned EIR and to provide background information on the Beeler Canyon area.

I, William E. Wood at 11699 Beeler Canyon Road, Poway, CA 92064, bought my property Parcel 1 lot of Beeler Canyon Acres in 1970. At this time there weren't any houses on the San Diego side of Beeler Canyon Road. The road was dirt. This road was an easement at the time. For me to get a building permit it had to be a dedicated road. Three lawsuits and four years later, I was able to build.

413

At the west end of my property, I bought and pay taxes on a 30-foot easement and in this easement there is a drain ditch. The owner to the west of me also has and pays taxes on a 30-foot easement. The ditch varies onto both our property easements. There have been several times when this ditch has overflowed onto our properties. If, as the EIR indicates, the drainage is all to the north of Montecito. We will have more water to flood more often. Additionally, the silt from the cut and graded land will clog this ditch and make the situation even worse. What do you plan to do?

414

The EIR says that the work for the developments may drain and contaminate our well water. The EIR does not address how this will be prevented. This is wrong to do this to people. It has been said that city water can be brought into this area, but will the city pay the many thousands of dollars to do this? Homeowners here have put in wells at their expense already. We have all put in septic tanks and leach lines at quite an expense. At this time, our sewer expenses are zero. If changes in the water table ruin our leach fields and if sewer lines are brought in, we will have to hook in at another expense to us. We will also have to pay the high sewer rates on water that primarily is used to water our property and gardens and will never go into the sewer system. The EIR provides no mitigation to these dangers and injustices to the residences here.

415

This report of wildlife in the area is so far off that it is unbelievable. We have ducks, seabirds, dove, quail, gnatcatchers, hawk, and falcons. We have deer, mountain lions, bobcats, pheasant, quail, and many kinds of snakes and frogs. You need to do more study on this.

416

The EIR gives as an alternative plan the widening of Beeler Canyon Road to a four-lane road, but it does not address which properties are going to be reduced to do this and the impact this would have on structures, improvements, wells, etc.

417

I know that this may not mean anything to most of you, but I have to tell you. I am a veteran (Marine) of both WWII and the Korean War. I fought in those wars for everyone's rights. I think the rights of those of us here in this canyon are just as important as those of a larger number of people.

Thank you for your attention to these matters.

William E. Wood

413

Comments are noted.

414

Drainage patterns would not be changed as a result of the proposed project (see EIR Section 4.5, Issue 1). All of the property within the Montecito sub-project currently drains to the north and would continue to do so should the proposed project be approved and constructed. The design of the Montecito sub-project includes measures to provide that post-development peak flows do not exceed pre-development peak flows. Temporary construction BMPs and post-construction permanent BMPs are required to address erosion and siltation impacts. See mitigation measures 4.4-2 and 4.5-1 through 4.5-10.

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See response numbers 151 and 346.

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See response number 410.

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See response number 403.

LETTER OF COMMENT

RESPONSE

619 221 6951
01-19-01 10:44 FROM:50022 TLEC PERLIN 619-221-6951 TO:619 236 8628 PAGE:02

January 16, 2001

To: City of San Diego
Land Development Review Division

Attention: Drew Kleis

Re: Draft Environmental Impact Report: Rancho Encantada Precise Plan

LDR No. 99-1094
SCH No. 2000011053

We are the owners of a 2.2 acre lot with a residence and horse facilities on Beeler Canyon Road in the City of San Diego. We have owned and resided on this property for the past four and one half years. We would like to submit the following comments on the above noted Draft EIR dated November 21, 2000.

Of great concern is the traffic impact that the proposed project will have on Pomerado Road. The EIR states that the project will have significant impact, but there is no discussion of possible measures to lessen such impact. The peak hours traffic problems on Pomerado Road range from severe congestion to near gridlock on a daily basis. Additionally, the congestion at the Mira Mesa Boulevard and the Scripps Poway Parkway/ Mercy Road approaches to I-15 is some of the worst in the county. In fact, as we wait to turn onto Pomerado Road each morning we see large numbers of cars turning off the Parkway to use Pomerado Road instead of these other approaches. In the evenings traffic backs up on Pomerado to turn onto the Parkway. The potential negative impact will manifest itself not only on Pomerado but also Spring Canyon Road and Scripps Poway Parkway. Alternate routes must be explored and found. Also, the impact of the planned military housing is not addressed.

Additionally the EIR does not address, or sufficiently address, the following: recreational facilities, security services (fire, paramedics, and police), the effects of the radar facility and high voltage lines, air quality, the water table, and the run-off resulting from grading and stripping the hillsides of the protective vegetation

Part of the traffic information in the report states that the capacity of Creek Road is 8,000 daily trips. One can only assume this is a typographical error. This is a half-mile of narrow two-lane road that could not support more than the current 25mph speed limit. It is bounded on either end by 1) a traffic signal and 2) a low visibility ninety-degree turn onto Beeler Canyon Road that is little more than a country lane. The EIR gives as an alternative plan the widening of Beeler Canyon to a four-lane road, but it does not address which properties would be impacted nor what the impact would be to structures, improvements, wells, etc.

The EIR is very deficient in its assessment of the wildlife in Beeler Canyon and the negative impact on the environmental balance that currently exists here. This canyon is inhabited by ducks, doves, quail, gnatcatchers, hawks, falcons, and other varieties. Additionally we have deer,

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Direct capacity increasing improvements to Pomerado Road (i.e., widening to four lanes) are restricted pursuant to community plan policies. Improvements and mitigation measures are recommended, however, at the Pomerado Road/I-15 interchange, along Spring Canyon Road, and at the intersection of Pomerado Road/Scripps Poway Parkway (see EIR Section 4.6, TRANSPORTATION).

The impacts of the proposed Military Family Housing project are analyzed in Section 4.8 of the Traffic Technical Report.

The EIR adequately analyzes the noted environmental issue areas in EIR Sections 4.11, PUBLIC SERVICES; 4.12, PUBLIC SAFETY; 4.8, AIR QUALITY; and 4.5, HYDROLOGY/WATER QUALITY. Also see response number 232.

The LOS E threshold of a two lane collector is 8,000 ADT based on City of San Diego design criteria, which was used as a default in the Traffic Technical Report. However, the City also provides a residential collector classification with an LOS C threshold of 2,200. In no case would the existing or projected volumes on Beeler Canyon Road exceed this value as a result of the proposed project. At project buildout, approximately 411 ADT are projected to occur on Beeler Canyon Road. A sensitivity analysis for 950 ADT also was conducted for Beeler Canyon Road, and no significant impacts were identified. There is no plan to widen Beeler Canyon Road to four lanes. Also see response numbers 73, 403 and 415

The noted species were either identified as observed or expected in the EIR analysis or in Appendices B1 and/or B2 of the EIR. The intent of the MSCP is to provide wildlife movement corridors and large contiguous blocks of habitat in which plants and wildlife can sustain themselves over the long term. The project would provide wildlife corridors through Beeler Canyon and large contiguous blocks of open space that abut even larger tracts of open space to the north, east, and south. Also see response number 57 regarding wildlife corridors.

LETTER OF COMMENT

RESPONSE

619 221 6951

JAN-19-01 10:44 FROM:SCOTT WMC ADULT

619-221-6951

TO:619 236 6628

PAGE:03

bobcats, mountain lions, coyotes, pheasant, and frogs. It is also home to many kinds of snakes, both poisonous and non-poisonous, which are instrumental in controlling the rodent population. The comment that the wildlife can follow a particular pathway out of the canyon to other areas is ridiculous. They will either be pushed into areas that cannot support them or into more densely populated areas where they will be killed either accidentally or on purpose.

422

In addressing the wildlife mention is made of one fenced property with an SDG&E easement that might deter this "migration" of wildlife out of the path of the construction. More definition is needed as to which property this. Will the owners be impacted, or what?

423

A glaring deficiency in the EIR is the total omission of a 67-acre parcel on the north side of Beeler Canyon Road. This property which includes a residence, many outbuildings, and extensive horse facilities is in the path of the planned drainage since Beeler Creek runs directly through the property. Within the time that we have lived here the Creek has seriously overflowed, flooding parts of the property. The additional drainage and silt run-off could cause serious damage and even destruction. The residence on this property sits near the existing narrow road and would be greatly impacted by the traffic noise as mentioned in the report. Any widening of the road would greatly impact this residence. No plan for mitigating this was given. Yet, this property is shown on the maps as open land.

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The grading and stripping of the protective vegetation on the hillsides will cause increased runoff that could far exceed the capacity of Beeler Creek. The report does not take into consideration the flood potential caused by sudden heavy downpours on either very dry compacted soil or already saturated soil. Already we have seen the possible effects of the drainage from the Poway business park on the north ridge of the canyon. Just last week the creek waters rose at an alarming rate during those rains.

426

Residents of Beeler Canyon Road rely on wells for water and have septic tanks. The report says that contamination to the well water is a possibility. What about changes to the water supply such as what happened north of Rancho Bernardo? Drainage and saturation levels could adversely affect the septic tank leach fields. Developers have said that we could "get lucky" and get city water and sewers. Residents here have already spent considerable amounts of money to have the wells and septic systems. The cost of watering the acreage, gardens, and animals with city water and paying the resulting sewer bills for water that never reaches a sewer system would be both prohibitive and punitive to people who have already paid for systems to provide their water and disposal.

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The actual plans for the Montecito and Sycamore Estates developments have changed many times and in many ways. How can the environmental impact be realistically determined until the scope and precise plans are known and finalized. The EIR needs to be much more definitive on these matters.

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We realize that a report such as this is the product of many engineering calculations, formalized projections, and estimates based on statistical data. However, it is a report that should leave nothing to chance and loose interpretation. To do so could be catastrophic. A vague, flawed, or

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423 The on-site SDG&E easement is not fenced. The fenced property referred to by this comment is an existing home located on the northerly portion of the Montecito sub-project site which is to the south of other properties along Beeler Canyon Road and that will remain in its existing location. Existing property owners would not be adversely impacted by fencing of the proposed development.

424 Observation of the properties within Beeler Canyon confirms that many are developed within the FEMA mapped 100-year flood plain and are subject to flooding during frequent runoff events. EIR Section 4.5 indicates that the project includes measures to provide that post-development peak flows do not exceed pre-development peak flows. Temporary construction BMPs and post-construction permanent BMPs are required to address erosion and siltation impacts. Also see response numbers 402 and 414.

425 The traffic volume on Beeler Canyon Road without the proposed project is 200 ADT. A sensitivity analysis was conducted as part of the Traffic Technical Report and it was found that 411 to 950 ADT would use Beeler Canyon Road. The noise impact from the additional cars per day is immeasurably small. Noise levels along Beeler Canyon Road would be as follows (CNEL at 50 feet to centerline):

No Project:	-	62.3 dB CNEL
With Project:	-	62.3 dB CNEL
Change:	-	<0.1 dB CNEL

Future noise levels as close as 50 feet to Beeler Canyon Road would be well within acceptable (65 dB CNEL) levels for residential use, and the project increment would be undetectable. Also see response number 403.

426 EIR Technical Appendices D1 and D2, consisting of draft hydrology reports, do contain appropriate analysis of the effect of grading and urbanization on the basin hydrology. These reports conclude that the post-development flow rates would not be increased over pre-development conditions. Mitigation measures 4.4-2 and 4.5-2 would reduce potential erosion impacts during construction to below a significant level.

427 See response numbers 151 and 346. Existing water wells and septic systems would not be significantly affected. The water table would not be increased as a result of the proposed project such that existing septic systems would be negatively impacted. Potential impacts to well water draw down would not occur because domestic and irrigation water for the proposed project would be supplied by the City of San Diego water system. Contribution of water well contamination would not result in the exceeding of a Maximum Contaminant Level (MCL) as established by the Clean Water Act. In addition, the Rancho Encantada project proposes permanent water quality measures that address potential negative impacts to ground water quality as outlined in EIR Section 4.5.

LETTER OF COMMENT

RESPONSE

428 EIR Section 3.0, PROJECT DESCRIPTION, accurately describes the proposed discretionary actions under consideration. Any substantial changes in the proposed project after City approval would require additional environmental review. Also see response number 389.

429 Comments are noted.

LETTER OF COMMENT

619 221 6951
01-19 01:10:45 FROM:SOCCO HCC ADMIN 619-221-6951 TO:619 236 6620 PAGE:04

incomplete report has the power to drastically, negatively, and irreversibly change the lives, and quality of life, of both humans and wildlife. It has the power to do the same to the land. People move out of the center city to avoid congestion and other situations that affect the quality of life. People moving into new areas need to be assured of moving into areas where quality of life has been protected. And, the people already living in those areas should be protected from having their lifestyles and quality of life damaged or destroyed. The great majority of the residents of this canyon do not look upon this area as just a place to have a house, but as an environment that supports our chosen lifestyle. Without the natural, uncongested setting, such a lifestyle is impossible.

429

We both strongly believe prevention is better and more desirable than "cures", even when cures are possible. Greed, oversight, lack of concern, and special interests should not stand in the way of cautious, caring, and responsible decision making and planning. We would like to invite Mr. Kleis and other members of the Land Development Review Division working on this project to come out to Beeler Canyon. We would like for you to join us for a hands-on tour and perspective of this area from people who feel that it is a privilege to be residents and "caretakers" of this unique piece of San Diego.

430

Please allow us to give just one example of a way of life made possible by the setting and situation as it currently exists here. One neighbor, William E. "Ed" Wood, cultivates a large portion of his 2.2 acres. He plants a huge garden, much more than he could ever use, and generously shares it with neighbors. He also makes large, regular donations of fresh produce to the St. Vincent DePaul's Center. Additionally, he makes available the remainder of his land for garden plots for senior citizens and others to use. He prepares the land for planting and donates the water for irrigation.

We feel that your office should know that no resident of Beeler Canyon Road or Creek Road received any notice regarding this EIR. We learned of it by chance. We know that notices went out to various areas and groups, and we do not understand why we, who stand to be so heavily impacted, received no notice.

431

Thank you so much for your time and attention to these matters and concerns.

Respectfully submitted,

Gene A. Adams

Gene A. Adams

Mary G. Adams

Mary G. Adams

RESPONSE

430 Comments are noted.

431 Section 15087 of the California Environmental Quality Act requires that public notice of the availability of a draft EIR be sent to organizations and individuals who have previously requested the notice in writing. The public agency must also follow at least one of three other procedures, which include publication in a newspaper of general circulation; posting of the notice on and off the site in the project area; or mailing of the notice to the owners and occupants of property adjacent to the site. In the case of the Rancho Encantada project, the notice of EIR availability was published in two newspapers, the *San Diego Daily Transcript* and the *Public Record Reporter* on November 22, 2000, and the notice was posted on the City of San Diego's Internet Web Page. Copies of the EIR or notices of availability of the EIR were also sent to the State Clearinghouse and to several agencies, organizations, and individuals. Those persons and organizations who submitted written comments on the EIR to the City of San Diego will be provided a copy of the final EIR.

LETTER OF COMMENT

RESPONSE

JAN-19-01 09 57 FROM:AE 113 698551.924 ID: 6985511994 PAGE 2/8

January 17, 2001

To: City of San Diego, Land Development Review Division

Re: Draft Environmental Impact Report: Rancho Encantada Precise Plan
LDR No. 99-1094
SCH No. 2000011053

I am the owner of a home on Beeler Canyon Road, located in the City of San Diego, and am submitting the following comments on the Draft Environmental Impact Report (DEIR) identified above, dated November 21, 2000.

1) The project's impact on traffic on Pomerado Road and in adjacent residential areas is extreme.

a) The project relies on Pomerado Road as its sole access to any site outside its boundaries, most notably to Interstate 15 (other freeway-connecting arterials such as Scripps Poway Parkway are themselves accessed via Pomerado Road). This limitation restricts any attempts to mitigate problems resulting from increased traffic loading on Pomerado due to the project.

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b) Per the analysis of Section 4.6.2 (pp. 4.6-17 and 4.6-18), the "opening day" load from the Montecito subproject alone would be sufficient to degrade the LOS of the Pomerado Road segment between Legacy Road and Treadwell Drive/Creek Road from C to F. Traffic between Poway and much of Scripps Ranch has no practical alternative to this segment of Pomerado, so this unmitigated impact of the project has far-reaching consequences for residents of both areas.

433

c) The project's impact to the intersection of Mira Mesa Boulevard with Scripps Ranch Boulevard during morning hours is deemed significant by the DEIR (Table 4.6-11). This matter is unaddressed in the text of the DEIR or in the mitigating measures of Section 4.6.4. This intersection is the only alternative to Pomerado Road and Scripps Poway Parkway for traffic bound for Interstate 15 from Scripps Ranch, southern Poway, and the project area, commuters, including those from the new project, driven to this last alternative by the expected service degradation on Scripps Poway Parkway and especially Pomerado Road, will have no further recourse.

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432 See response number 418.

433 ADT-based analysis is useful planning tool for roadway sizing, and is required for all traffic analyses by the City of San Diego's *Traffic Impact Study Manual*. However, this type of analysis has been frequently found to understate capacity, since it does not take into account peak hour characteristics and the operation of the traffic signals controlling the flow on the segment. As shown in Table 4.6-11 of the EIR, the intersections on both ends of this segment would be characterized by good LOS C or better conditions during both peak hours under Buildout with Project conditions.

434 Mitigation at this intersection is to be provided by the Scripps Gateway project. Provision of an exclusive eastbound-to-southbound right turn lane would restore LOS from F to D during the morning peak hour under the Buildout with Project conditions.

d) The DEIR's analysis of traffic effects of project buildout (Table 4.6-12) treats Pomerado Road as a single segment from Interstate 15 to Treadwell Drive. This simplification clearly conflates two segments of roadway that are independent with respect to project traffic (north and south of the main project access at Rancho Encantada Parkway), as well as many shorter segments of Pomerado Road, including those most significantly affected by the initial project traffic. In this light it is impossible to judge the real effect of project buildout on Pomerado Road. Even the combined effects are deemed significant and are unmitigated.

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e) The proposed mitigating measures of Section 4.6 are not analyzed in the text of the DEIR; as a result their likely efficacy is unclear. In light of the severity of traffic impacts from even the preliminary stages of the project, effective mitigation is of signal importance.

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2) The DEIR's analysis of existing conditions and land uses in Beeler Canyon, along the northern boundary of the project area, is inaccurate in several regards. These inaccuracies tend to minimize several significant impacts of the proposed project on this rural-residential area.

a) The description of the surrounding environment (Section 2.2.1) states that the South Poway Business Park lies "[i]mmediately north of the Rancho Encantada project boundary". In fact a significant body of private property, including a large property in the City of Poway whose existence is acknowledged nowhere in the DEIR, intervenes and stand to be affected by the proposed project. Some of these properties lie partly or entirely in the Beeler Creek flood plain and would be severely affected by changes in runoff patterns.

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b) The homes along Beeler Canyon Road and Creek Road depend on residential wells for their water supply. The project as proposed would intentionally direct all urban runoff to Beeler Creek rather than to the canyons to the south (pp. 4.5-9 and 4.5-16), with expected "significant direct and cumulative short- and long-term water quality impacts" (p. 4.5-18), but the DEIR does not analyze these effects and the associated mitigation measures as they affect the existing wells.

438

c) There is a commercial equestrian facility (Creek Road Equestrian Center) on Beeler Canyon Road, located in the City of Poway, whose existence is acknowledged nowhere in the DEIR. This facility takes its water from a well and lies in the Beeler Creek flood plain. Both runoff

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435 Analysis of Pomerado Road between Treadwell Road/Creek Road and I-15 identifies vehicle speeds and LOS in both directions of travel during both peak hours. Review of the analysis indicates that the congestion expected as a result of typical commuting patterns (i.e., westbound in the morning and eastbound in the afternoon) does appear in the results, together with the project's significant impact to these facilities. Based on this, it is concluded that the project's impacts are sufficiently evaluated based on the subdivision of Pomerado Road shown in the Traffic Technical Report.

436 The Traffic Technical Report (EIR Appendix E) discusses the benefits of the recommended transportation improvements in its Appendix K, Sketches of Transportation Improvements. It is not necessary to include an analysis of the proposed mitigation measures in the impact analysis portion of EIR Section 4.6. Please note that the EIR does disclose a significant unmitigated impact on Pomerado Road on an ADT basis. The only mitigation that would restore LOS to the minimum performance standard would be to widen Pomerado Road to provide four lanes. This improvement would be in conflict with the objectives of the Miramar Ranch North and Scripps Miramar Ranch community plans, which limit this segment to one travel lane in each direction.

437 The South Poway Business Park is separated from the proposed project site by a distance ranging from approximately 650 - 1900 feet. The word "immediately" has been stricken from the text. Regarding runoff patterns, drainage patterns would not be significantly changed as a result of the proposed project (see EIR Section 4.5, Issue 1). Post-development flow rates would not exceed pre-development levels.

438 Existing drainage patterns would be maintained, with the exception of a 62-acre diversion. Urban flows from this area would be directed away from the southerly canyons and into Beeler Creek. Existing water wells would not be significantly impacted as detailed by response numbers 151 and 346.

439 Surrounding land uses are depicted on final EIR Figure 2-4. See response numbers 151 and 346.

LETTER OF COMMENT

and water-quality impacts from the proposed project may be expected to affect this facility.

d) The current-traffic estimates for Creek Road/Beeler Canyon Road given in Section 4.6 (Table 4-6-1, Figure 4-6-2) are obviously inaccurate. Figure 4-6-2 claims a current traffic volume of 500 (sic) trips per day. The canyon contains approximately 20 single-family residences, a single commercial equestrian facility, and a small mining operation (most of whose traffic passes through a private road into the South Poway Business Park rather than along Beeler Canyon Road); even if half the existing traffic were accounted for by commercial uses (a gross overestimate), this level of traffic flow would still require approximately twelve vehicle trips per private household per day on the average.

The developer (Vice President Jeff V. Brazel, speaking to the January 16, 2001 meeting of the Miramar Ranch North Planning Group) has offered as a potential explanation for this incongruity the fact that Beeler Canyon Road historically served the General Dynamics test facility located at its eastern end. As the General Dynamics facility has been inactive for several years and those years have involved changes to land-use patterns in the canyon, this explanation does not reconcile the DEIR's estimates with current traffic patterns.

3) The project relies on Creek Road/Beeler Canyon Road as one of only two access routes.

a) The combination of Beeler Canyon Road and Creek Road is characterized by the DEIR as a collector road (Table 4-6-1). In no sense can this road be considered a collector; it is a narrow two-lane road with irregular curves and limited lines of sight, and a consequent 25-mile-per-hour speed limit. (That this limit is rarely exceeded is testament to the intractability of the road!) Its alignment is restricted by the presence of Beeler Creek and by the designated open space, rural-residential properties, and commercial facilities that abut it.

b) The DEIR estimates the capacity of Creek Road at 8000 trips per day. This is a highly unrealistic estimate given the nature of the road as noted above, spread evenly over a 24-hour day, it would require a steady parade of cars at a spacing of a few hundred feet to achieve. Under more realistic assumptions, with most of the trips taking place during morning and evening hours and little to no late-night traffic, it would require constant bumper-to-bumper traffic during peak hours.

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RESPONSE

440) Surrounding land uses are depicted on final EIR Figure 2-4. See response numbers 151 and 346.

441) The existing ADT count on Beeler Canyon Road was adjusted to reflect the operation of the former General Dynamics facility on the site. At its peak operation, this facility added 300 daily trips to the 200 ADT generated by the uses loading to the roadway.

442) See response number 421.

443) See response number 421.

LETTER OF COMMENT

RESPONSE

c) The City of Poway has expressed, on record, its intention to close off Creek Road if the Rancho Encantada development connects to Beeler Canyon Road, thus rendering the connection itself useless

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d) The estimate that, at buildout, only 3% of the project's traffic will flow to Beeler Canyon seems implausible in light of the practical tendency of drivers to seek alternatives to congested routes. The proposed connection to Beeler Canyon would provide a route to Interstate 15 (via Scripps Poway Parkway) avoiding the extremely congested (LOS F) segments of Pomerado Road south of Creek Road, and would therefore be attractive to freeway-bound drivers until its LOS became degraded to a level comparable to that of the adjacent Pomerado Road segments. The inescapable conclusion is that Beeler Canyon/Creek Road will become a cut-through route for a proportion of project traffic sufficient to degrade traffic flow to, or nearly to, LOS F. Such traffic flow would be obviously incompatible with the existing rural-residential land use, as well as unsafe for residents, seemingly violating the Urban Design Element of the City of San Diego's Progress Guide and General Plan. This matter should be addressed in Section 4.1 of the DEIR.

445

e) Because of Beeler Canyon Road's unique position along the common border of the Cities of San Diego and Poway, law-enforcement jurisdiction has historically been a matter of some confusion, with the responding agency sometimes unable or unwilling to take enforcement action in what it perceives to be the other's jurisdiction. Increased traffic on Beeler Canyon would require a heightened law-enforcement presence and could be expected to exacerbate these jurisdictional problems proportionately.

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f) In the event that the City of Poway limits access to Creek Road as per its expressed intent (see paragraph (c) above), fire response to the undeveloped eastern portions of Beeler Canyon is likely to be affected. These areas have historically burned regularly and will remain subject to fires after the project is constructed, but if Creek Road is closed there will be no direct or obvious route to the east end of the canyon. Degraded fire response would present a significant threat to residents and facilities in the new project, particularly the Sycamore Estates subproject, as well as to existing facilities on Beeler Canyon Road.

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g) By the DEIR's analysis, the effect on project traffic of not connecting to Beeler Canyon via Street B would be negligible (Table 4.6-16). In this light the Street B connection can be seen to create

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444 See response number 131.

445 The project assignment evaluated in the Traffic Technical Report was based on the traffic model. However, in order to evaluate the sensitivity of this assignment, an additional analysis was undertaken. Appendix K of the Traffic Technical Report provides an analysis of two alternative Beeler Canyon Road/Creek Road options. The first is the closure of the road and the second is a substantially higher project assignment (i.e., 950 instead of 210) on this link. The evaluation found that the reassignment of traffic would not generate any new significant impacts on intersections affected by this diversion.

446 The comment refers to a jurisdictional issue that is beyond the scope of the proposed Rancho Encantada project.

447 Evaluation of the potential environmental impacts of a future proposed action by the City of Poway on residents of Beeler Canyon Road and Creek Road is beyond the scope of the Rancho Encantada EIR. In the event that this road is closed, Street "B" would still be constructed, but would serve as emergency-only access. Mitigation measure 4.11-4 also addresses this concern. Also see response number 131.

448 See response numbers 131 and 447. Street "B" is required for emergency-only access.

LETTER OF COMMENT

RESPONSE

significant impacts, unmitigated and perhaps unmitigable, while providing no benefit to the project

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4) The DEIR does not consider in any detail the cumulative traffic impact of military housing proposed for construction on nearby portions of MCAS Miramar. This omission seems to be based on the assumption that such a military project would open exclusively onto Pomerado Road, which under the assumptions of the DEIR would have already been degraded to LOS F by the proposed project and continuing urban development. However, even within LOS F there are variations in traffic flow, and these variations are likely to affect the distribution of project traffic and therefore change the conclusions of the DEIR's traffic study over a larger area than the immediate vicinity of the proposed military project. In addition, possibly the greatest unexplored approach to traffic mitigation involves cooperation with the Marine Corps in this regard, a possibility which needs to be considered in light of the significant traffic difficulties presented by the location of the project.

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5) The DEIR's hydrology/water-quality analysis (Section 4.5) identifies significant water-quality impacts and proposes mitigation measures (p. 4.5-19 et seq.). Analyses of the likely efficacy of these measures, as well as the details of responsibility for their maintenance and continued effectiveness, are deferred to the Storm Water Pollution Prevention Plan (SWPPP), which, however, is not yet available for public review. Accurate judgement of the effectiveness of the project's mitigation of its water-quality impacts is impossible in the absence of this information. This matter is particularly significant as the affected groundwater supplies drinking water for a number of residences and an equestrian business (item 2(b) above), as well as for the wildlife dependent on Beeler Creek and associated wetland habitat.

450

451

6) Immediately south of the project boundary is a radar facility whose existence and potential effects on the project are not discussed in the DEIR.

452

7) To the south of the Montecito subproject boundary, on the Miramar base just east of Pomerado Road and south of the access road to the SDG&E substation, is a vernal pool. This pool is not within the project area and is not subject to direct effects, however, since the pool is intermittent, it is likely that the wildlife depending on it require a corridor through the general area of the Montecito subproject to reach the more reliable water supply of Beeler Creek in the dry season. Moreover, the apparent watershed for the vernal pool includes much of the Montecito subproject site, whose runoff the project proposes to redirect to Beeler Creek. The potential impact of the project on this wetland habitat should be addressed in the DEIR to assure compliance with the California Environmental Quality Act.

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449

At the time of the traffic study scoping, the location of the Military Family Housing was not established. Accordingly, it was assumed that this use would load to Pomerado Road south of Rancho Encantada Road, which is consistent with a traffic impact analysis prepared by BRW. The traffic associated with the Military Housing is evaluated in Section 4.8 of the Traffic Technical Report. Also see response number 459.

450

It is true that mitigation measures cannot be deferred. However, measures may specify performance standards which would mitigate the significant effect. Adequacy of the proposed project's mitigation of water quality impacts can be assured through conditioning project approvals upon compliance with federal, state and local Clean Water Act regulations. These regulations cover construction impacts as well as post-construction impacts.

451

See response numbers 151 and 346.

452

See response number 232.

453

Vernal pools may serve as temporary water sources for wildlife but are generally dry by mid-May. Species capable of moving from this area to Beeler Canyon would also be capable of doing so around the eastern portion of Sycamore Creek. No vernal pool watersheds extend onto the Montecito sub-project site; therefore, no direct or indirect impacts to vernal pools are expected.

LETTER OF COMMENT

8) The analysis of affected wildlife (Section 4.3-1, p. 4.3-13 et seq.) either omits entirely, or does not fully analyze the project's impacts on, several sensitive species that occur in the project area, including some that depend on corridor access from areas in or south of the project footprint itself to the wetland habitat of the Beeler Creek flood plain.

454

All the species listed below are observed with some degree of regularity crossing Beeler Canyon Road, and as a result elevated traffic on that road would pose a significant direct threat through increased roadkill. The project also has the potential to interrupt wildlife corridors used by these and other species for access to the Beeler Creek wetlands.

a) Western spadefoot toad (*Scaphiopus [Spea] hammondi*): Known in the project site from historical records and observations of current area residents. The Western spadefoot toad is deemed sensitive by both state and federal criteria (CSC, FSC) and likely qualifies as "rare" under the definition of the California Environmental Quality Act (CEQA), Section 15380, because of the threat posed to California populations by increasing urbanization. It is not a covered species under the MSCP.

As this is a secretive species rarely seen on the surface except for brief nocturnal periods during spring rain¹, it is not surprising that it would not have been found in initial surveys of the project site. Habitat fragmentation from development is a severe threat to the species, as it requires access to breeding ponds from potentially distant burrow sites².

b) Northern red diamond rattlesnake (*Crotalus ruber ruber*): Seen somewhat commonly in summer by current residents of Beeler Canyon, especially in the vicinity of the proposed Sycamore Estates subproject. The species is mentioned in the DEIR (Table 4.3-4) but its vulnerability to the effects of the project is not assessed, although it probably qualifies as "rare" under CEQA criteria due to its restricted distribution (with the U.S. population essentially confined to the coastal and inland strips of San Diego County³) and the proximity of its habitat to urban development.

¹ Showmaker, V.H. et al (1989). Seasonal changes in body fluids in a field population of spadefoot toads. *Copeia* 1989 (3), 585-91.
² *Ibid*.
³ Klauber, Lawrence M. (1956) *Rattlesnakes*. University of California Press (Berkeley, CA)

RESPONSE

454

Potential impacts to these species were assessed within the context of the MSCP. Their potential to occur on-site was also evaluated in Appendices B1 and B2 of the EIR Technical Appendices. All of the species mentioned have a moderate likelihood of occurring on-site, except for the spadefoot toad, which has a low likelihood of occurring on-site. These species are adequately mitigated through implementation of project open space protective measures.

As recent research has shown that rattlesnakes forced (as by habitat modification or translocation) into new territory rarely survive⁴, development in the foraging range of the Beeler Canyon population constitutes a significant threat. The red diamond rattlesnake competes with other rattlesnakes, principally the Southern Pacific rattlesnake (*C. viridis helleri*), in the project area and neighboring areas; *C. ruber* is by far the less common of the two. The possibility should be considered that reduction and partial isolation of the Beeler Canyon population, and fragmentation of its habitat by road and other development associated with the proposed project, would threaten its reproductive viability, as has apparently happened with the population similarly isolated in Torrey Pines State Preserve⁵. This species is also at particular risk of roadkill impact from increased traffic associated with the project because of the well-known tendency of rattlesnakes to bask on road surfaces after sundown in warm weather.

c) Two-striped garter snake (*Thamnophis hammondi*): Very commonly seen in Beeler Canyon in the fall, presumably enroute to hibernacula. Some of these hibernacula appear, based on the snakes' movements, to be well south of Beeler Creek, either inside the project area or beyond it on the Miramar base. The species is a state and federal species of concern and has CDFW Protected status and USFS Sensitive status. It is not addressed by the DEIR.

In Torrey Pines Preserve the two-striped garter snake has apparently been unable to survive in the absence of frog species other than the Pacific tree frog; because Beeler Creek's other major anuran species, the Western spadefoot toad, is at risk from the project, the garter snake population supported by Beeler Creek faces a potentially significant threat to its food supply from the project.

d) Coastal rosy boa (*Lichanura trivirgata roseofusca*): A highly seasonal species that occurs in the summer in Beeler Canyon, in adjacent Sycamore Canyon, and presumably in the project area as well, but that is not addressed by the DEIR. The species is a federal species of concern.

The leading threats to the rosy boa populations in similar habitat (e.g., chaparral and mulefat scrub) in Torrey Pines State Preserve are roadkill

⁴ Heinen, H.K. and Robert H. Roper (1999). Impacts of translocation on behavior and survival of timber rattlesnakes, *Crotalus horridus*. *Journal of Herpetology* 33:1, 45-61.

⁵ *Wildlife Management Plan for Torrey Pines State Preserve* (November, 1997, rev. December 1998).

⁶ *Ibid*.

LETTER OF COMMENT

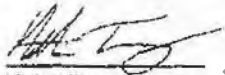
RESPONSE

and collection for the pet trader. The latter concern has no evident connection to the project, but the former would be significantly exacerbated by an increase in traffic on Beeler Canyon Road.

↑
454

Thank you for your attention to these comments.

Sincerely,



Nathan Tenney
11025 Beeler Canyon Road
Poway, CA 92064
+1 858 689 0199

7/1/91

LETTER OF COMMENT

RESPONSE

859562961

FROM : ATH ATH FROM: NO. : 859562961 Jan. 21 2001 10:59PM P2

January 18, 2001

Mr. Drew Kiels, Senior Planner
City of San Diego Planning and Development review
122 First Avenue, 8th Floor
San Diego, Ca. 92101

SUBJECT: Rancho Encantada Precise Plan LDR No 88-1094 SCH No. 2000011053

Dear Mr. Kiels:

As a neighboring resident in the Beeler canyon area , Paul and Betty Roxford , 11970 Creek Road Poway, I have grave concerns for my family and our quality of life as we know it, we have lived on Creek Road for 28 years. We have watched as the City of San Diego developed high density all around our area . In Poway's General plan for the Creek Road Area there are no plans for more intense use in our small Area . Beeler Canyon/ Creek Road is a wildlife corridor with the creek running through and a Subarea Habitat conservation Plan designates . Our area is not traveled much as it is a country road, it dead ends in Beeler Canyon Creek Road and is not planned for growth because of sensitive habitat and Poway's general plan

455

455 Comments are noted.

The Poway City Council had a open public meeting with McMillian, after the meeting the city manager and City Council recommend upon completion of a public street access connecting Beeler Canyon Road through the proposed project to Pomerado, Road . Then Creek Road should be closed at the intersection with Beeler Canyon Road and the right-of-way to Creek Road be vacated to the abutting owners in Poway Creek Road. I am one of the owners and I totally support the City Manager and the Poway City Council.
letter 3-24,2000 page 4,circulation from City of Poway Nial Fritz Director of Dev. services

456

456 See response number 131.

1- Traffic and Biology
Beeler Canyon Road in San Diego, and Creek Road in the city of Poway, together form a narrow two-lane country road serving a sparsely populated rural residential that is not planned by the City of Poway for more intense use. The increase in traffic volume could, in turn significantly impact the viability of the Subarea Habitat Conservation Plan designates in the Beeler Canyon Creek Road area as an important regional and local wildlife corridor system. Beeler Canyon Road and Creek Road follow along this corridor system, they are used by a very limited amount of local traffic only. The introduction of this secondary access route from Rancho Encantada parkway, with direct access to Beeler Canyon road, will significantly increase traffic volumes on the narrow roadway. The increase in traffic volume could, in turn, significantly impact the viability of the corridor system.

457

457 See response number 73.

LETTER OF COMMENT

8585260961

FROM : ATN

ATN

PHONE NO. : 8585360961

Jan. 21 2001 11:00PM '03

7

2- Traffic volume on Creek Road will increase from you say current 200 daily trips ? I know different I live there and there are not 200 daily trips per day. To only 411 at build out that 411 two many. If this projection is to be believed and I don't believe it then any connection to Beeler Canyon Road / Creek Road is unnecessary. Table 4.6-16, in fact indicates that removal of the connection to Creek Road would not result in significant intersection delays or reductions in LOS. 458

9- The study indicates to us that the project not only lacks satisfactory secondary access, but lacks adequate primary access as well the logical location for access is to connect to the Miramar Way Interchange at Interstate 15 through a south westerly road through MCAS Miramar land and it would help Pomerado Road at Scripps Poway Parkway. 459

4- Beeler Canyon Road as a project access page 4.8-13 and 14 is not reliable assumption as the basis of this project traffic study. In no way can Creek Road be construed as adequate to serve as access to project of this magnitude the road is rural residential with kids and horses and no sidewalks and no lights and very narrow. We would also appreciate if Creek Road on all your maps be spelled out and not spelled Crk all the other roads are spelled out it is like you would have it disappear but you still have it on you plan for traffic. 460

6- Creek Road and Pomerado Road existing intersection was not built for increased traffic there is no Area of land to widen the road for left turning lane or even a right turn lane it drops off into the creek traffic has increased significantly on Pomerado Road between Tradwell and scripps Poway Parkway, and with Trident Center. 461

8- The EIR transportation section analyses does not talk about year 2020 build out with full project of the military multi-family housing page 4.8-1 at 1,000 units the MCAS project would double the number of the units of this EIR. 462

7- A traffic impact analysis for a project of this magnitude should report conditions as accurately as possible We found out the traffic study for the Trident Center was not right they had twice as much traffic with only two businesses opened. I live here so I told them the traffic study was not right and this study of traffic on Creek Road is not right I believe McMullin owned the property and worked with the property owners of the homes ? HCS Arterial Analysis will identify additional segments to report with a LOS worse than D and should be reported on p.8 463

RESPONSE

458 It is agreed that the re-assignment of traffic resulting from the removal of the Beeler Canyon Road/Creek Road secondary access would not generate any new significant adverse traffic impacts.

459 This access alternative was evaluated and found to be infeasible due to opposition of the U.S. Marine Corps.

460 See response number 445.

461 Comment is noted.

462 See response number 419.

463 Comment is noted.

LETTER OF COMMENT

8065620961

FROM: ATH

ATH

PHONE NO. : 8595660961

Jan. 21 2001 11:01PM P4

Sewer Services

8- A sewer pump station is proposed near the intersection of Beeler Canyon and Creek Road. The single station would serve the entire 1,000 units. If the Station would fail it would significant impact the residents of these two communities and be equally devastating to the Beeler Creek why is not addressed in the EIR ?

464

9- Water runoff into Beeler Canyon and potential residential run off into the Creek is inadequate addressed something needs to be done to save Beeler Creek from pollution.

465

10- Noise and Air Pollution. Increased noise Pollution from traffic as the canyon walls trap the sound an create an echo chamber. Increase traffic would also cause high levels of exhaust fumes, increasing air pollution and causing unhealthy conditions for residents along Creek Road and Beeler Canyon Road. The EIR does not address these items and they need to be addressed as we live in the canyon.

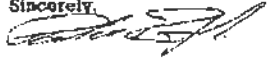
466

11- In summary, It is unconacionable you would try to put traffic from the City of San Diego into the City of Poway with cumulative impact that you can't mitigate. Creek Road is not a collector roadway in sense of the word remember I have lived here for 28 years. With 10,000 trips per day coming out of the development we know more trips per day will be coming through Creek Road than your traffic study projects you can't tell then where to drive.

467

Thank you for the opportunity to review and comment on the Draft EIR for Rancho Encantada. Looking forward to my answers back.

Sincerely,



Paul Rexford
11570 Creek Road
Poway Ca. 92064
(659) 966-0801

RESPONSE

464 See response number 100.

465 See response numbers 100, 417 and 421.

466 See response numbers 408 and 425 regarding impacts to Creek or Beeler Canyon Roads. The traffic study forecasts that Montecito and Sycamore Estates combined would add 39 cars per day to Creek Road. This is less than 2 cars per hour. Two cars per hour on average would not create substantial degradation of the air quality or acoustic environment.

467 See response number 445.

LETTER OF COMMENT

RESPONSE

Jan-19-01 12:03P

P. 02

January 18, 2001

David L. Davis
11019 Beeler Canyon Rd
Poway, Ca. 92064

TO: City of San Diego
Land Development Review Division

RE: Draft Environmental Impact Report: Rancho Encantada Precise Plan

LDR No. 99-1094
SCH No. 2000011053

I am the owner of a residence immediately adjacent to the proposed development. My property has no sewer or water access. My neighbors and myself rely on teach lines and wells for sewer and water. I am submitting the following comments on the above noted DRAFT EIR dated November 21, 2000.

- 1) Section 4.5 Hydrology/Water Quality
Page 4.5-9 indicates an increase of 6.7 acre feet of water runoff for the Montecito Project and page 4.5-10 indicates an increase of 9 acre feet of water runoff for the Sycamore Estates Project. This total increase of 15.7 acre feet of water (over 5.2 million gallons) is proposed to drain into Beeler Canyon annually as a result of the project.

This analysis indicates a SIGNIFICANT change to the hydrology of the area but does not indicate the resulting impact to our existing wells and septic systems. The level of impact should be assessed and mitigated if necessary. Also, if additional wells are allowed, their impact should be included and mitigated. 468
- 2) Section 4.5 Hydrology/Water Quality
Page 4.5-15 indicates SIGNIFICANT short term and long term water quality impacts to the Beeler Canyon area but does not indicate the resulting impact to our existing wells and groundwater. The level of impact on our wells and groundwater should be assessed and mitigated if necessary. 469
- 3) Section 4.11 Environmental Analysis- Public Services
Pages 4.11-19 and 4.11-20 estimate the generation of over 323,000 gallons of sewage daily. Both the lift option and the gravity option would cause this sewage to pass through Beeler Canyon. In the event of a sewage system failure and a resulting spillage, what would the impacts be on Beeler Canyon, our groundwater, and on our wells. The impacts should be assessed and mitigated if necessary. 470
- 4) Section 4.12 Environmental Analysis-Public Safety
Section 4.12.1 Existing Conditions
This section considers the existing power transmission lines. The existing high power stopplar radar is also in the immediate vicinity. This system was designed to produce and transmit high power electromagnetic fields. The strength and impact of these fields on the residents of this project should be assessed and mitigated if necessary. 471
- 5) Section 4.6 Transportation
Page 4.6-16 estimate the project trip generation on Beeler Canyon Road. The project will have a significant impact on this rural road. The analysis grossly underestimates the project trip generation on Beeler Canyon Road. The level of congestion at the intersection of Pomerado Road and Rancho Encantada Parkway will force traffic onto Beeler Canyon Road. 472

- 468 See response numbers 151 and 346.
- 469 See response numbers 151 and 346.
- 470 The Beeler Canyon drainage basin also constitutes the sanitary sewer basin. Sewage generally flows by gravity. It is appropriate for wastewater generated within the basin to travel in pipelines through the basin and be carried away by the sanitary sewer system for treatment at the downstream end of the basin. Also see response number 100.
- 471 See response number 232.
- 472 See response number 445.

LETTER OF COMMENT

RESPONSE

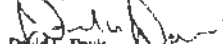
Jan-19-01 12:04P

P. 03

- 6) Section 4.7 Noise
Both short term and long term noise impacts are significant. Some of the existing older residential units are extremely close to Beeler Canyon Road. It is doubtful that the construction techniques used years ago when those houses were constructed result in 15 decibels of noise reduction. The combination of older construction and close proximity to the roadway easily exceed the 45 decibel interior noise standard with even a minor increase in traffic on Beeler Canyon Road. 473
- 7) Section 3.0 Project Description
Page 3-6 indicates that Sycamore Estates sub-project may take interim primary access from Beeler Canyon Road prior to the completion of Rancho Encantada Parkway. The impacts of this option are significant. The resulting traffic and noise impacts need to be assessed and mitigated if necessary. 474
- 8) Section 4.9 Hydrology/Water Quality
Page 4.9-9 indicates an increase of 6.7 acre feet of water runoff for the Montecito Project and page 4.9-10 indicates an increase of 9 acre feet of water runoff for the Sycamore Estates Project. This total increase of 15.7 acre feet of water (over 5.2 million gallons) is proposed to drain into Beeler Canyon annually as a result of the project. This analysis indicates a SIGNIFICANT change to the hydrology of the area but does not indicate the resulting impact to our existing Property. A 67 acre horse ranch exists in Beeler Canyon Road. The level of impact should be assessed and mitigated if necessary. 475

Thank you for your attention to these matters.

Sincerely,


David L. Davis

473 There is no measurable amount of project traffic forecast to use Beeler Canyon Road that would cause any noise impacts regardless of the condition or age of houses. Any residential structure that has no wind blowing through the structure achieves 15 dB of reduction when windows are closed. As noted in response number 425, the forecast noise impact to Creek Road is less than 0.1 dB CNEL. The noise impact along Beeler Canyon Road farther east is even lower because there is no reason for Rancho Encantada project residents to be driving on this roadway. There is no foundation for suggesting significant noise impacts where essentially zero impacts are forecast to occur.

474 This relates to the condition that could have occurred if development of the Sycamore Estates sub-project had proceeded the Montecito sub-project. This condition would no longer occur and access would be provided via Rancho Encantada Parkway.

475 The comment accurately quotes the estimated annual volume increase in runoff, but is not accurate regarding the significance of the impact. If the concern is groundwater impact, the annual volume increase would not result in a direct corresponding increase in groundwater because the majority of the volume increase would be in the form of surface runoff. Also, the increase in impervious surface has an offsetting, though not significant, impact on groundwater recharge. If the concern is surface water impact, the peak discharge increase would be addressed through detention and the annual volume increase would not result in significant surface water impacts.

LETTER OF COMMENT

01-19-01 10:15 FAX 6190025533 6196925533 A C M

002

1-18-01

To: City of San Diego
Andrew Kleiss
Environmental Analyst

RE: Draft Environmental Impact Report on Rancho Encantada Precise Plan

LDR No 99-1094
SCH No 2000011053

I reside at 11055 Beeler Canyon. I would like to submit these comments to be considered in the review of this draft EIR.

- 1. I have written the City of Poway and asked them to close Creek Road in the possible event of approval of this project. The Mayor of Poway wrote back assuring me that they plan on closing Creek Road should San Diego approve this project. The City of Poway has also gone on public record as to their intent to close Creek Road. The residents of Beeler Canyon could use La Encantada Parkway for entry/exit. 476
- 2. The EIR is seriously flawed in its projections of traffic on Beeler Road. My recommendation is that Beeler Road be closed and only considered for emergency access. 477
- 3. The traffic plan of using Pomerado Road, already at over capacity, is totally unacceptable. This project is using a 4-lane connector, La Encantada Parkway, to enter onto 2-lane Pomerado. Common sense dictates that this is extremely poor planning. My recommendation is to use the military property to the south of this project and exit the traffic onto the Miramar Way exit on I-15, or connect up to Highway 52 or Highway 67. Traffic through the Scripps Ranch community should be avoided at all costs. 478
- 4. The project should never be considered without adequate public transportation to the project. 479
- 5. The EIR does not answer the issue of water quality impacts on wells in Beeler Canyon, nor does it adequately address flooding in Beeler Canyon. My property has an ephemeral stream draining from the south into Beeler Creek. This usually dry stream has overtopped its banks in the past 15 years by direct observation of residents who live in the area. This project threatens to cause flooding at my property and other properties in the area. 480
481
- 6. The developers should be mandated to work with the military on a comprehensive plan for the region, as the military already has indicated that it has plans to develop up to 6,000 housing units just south of this project. 482
- 7. This plan defies all the guidelines of SANDAG for housing in San Diego - it is a land locked parcel 8 miles from the Interstate that will depend totally on car traffic for entry/exit. It is not affordable housing and has no plans to mitigate the estimated 10,000 car trips per day by ride sharing, public transportation, or any other means. 483
- 8. The EIR does not address the potential health impacts of the new radar site on this project (the round dome weather radar). 484

RESPONSE

- 476 Comments are noted. See response number 131.
- 477 Comment is noted. See response numbers 98 and 445.
- 478 See response number 459.
- 479 See response number 104.
- 480 See response numbers 151 and 346. As discussed in final EIR Section 4.5, implementation of the Rancho Encantada project would not result in increases to peak runoff rates. Therefore, the proposed project would not effect downstream flooding.
- 481 See response number 424.
- 482 Comment is noted. See response number 116.
- 483 Comments noted. Please note that the proposed project would provide 106 affordable housing units and that all transportation impacts would be mitigated to below a level of significance with the exception of direct and cumulative impacts on Pomerado Road.
- 484 See response number 232.

LETTER OF COMMENT

01/10/03 10:15 FAX 8186923833 6196925533 A C M

0000

9. The surveys of wildlife in the area poorly represents the diversity of wildlife that has been observed to inhabit this area by those of us who live there. The EIR does not address fully the impact to the wildlife.

485

10. The recreation facilities in Scripps Ranch cannot serve the increased demands of this project. The EIR needs to address how this project could meet the entire recreational needs of the project without attempting to use the facilities of the surrounding region, which are already over capacity, especially the recreation center in Scripps Ranch.

486

Sincerely,



Tim Smith
Beeler Canyon Resident
11055 Beeler Road
Poway, CA
619-566-3200

RESPONSE

485 Surveys for project followed standard protocol for projects of this scope within the City of San Diego. Data has been collected over a number of years on the site and incorporated into the analysis for the project.

486 The project's significant impacts on public parks would be fully mitigated through conveyance of a 4.0 net-acre public park site adjacent to a proposed elementary school site on the Sycamore Estates sub-project. If the school site is not developed, the on-site public park would increase to 8.05 net-acres (mitigation measure 4.11-2). All public recreation facilities in the City of San Diego can be used by any member of the public, including the public parks in Scripps Ranch and the proposed on-site public park in Rancho Encantada.

LETTER OF COMMENT

RESPONSE

January 19, 2001

TO: City of San Diego
Land Development Review Division

RE: Draft Environmental Impact Report; Rancho Encantada Precise Plan

LDR No. 99-1094
SCH No. 2000011053

We are the owners of nine residential lots, including two residences, located on Creek Road in the City of Poway within an area zoned for half-acre lots and are submitting the following comments on the above noted Draft EIR dated November 21, 2000, specifically with respect to the primary and secondary accesses to the project.

1) **The project relies upon Beeler Canyon Road/Creek Road as one of its two accesses.**

a) Table 4.6-1 (page 4.6-6) categorizes Creek Road as a two lane Collector roadway with a capacity of 8,000 trips daily. Creek Road is not a Collector road in any practical sense as it has serious deficiencies in sight distances both horizontally and vertically. "Country Lane" is a more apt description. Figure 3-5A (page 3-13) shows the rural nature of Creek Road and the constraints of its alignment - e.g., its intersection with Beeler Canyon Road is almost right angled with a vertical sight distance of less than 100 feet. The paved width is only 24 feet over most of its length and its intersection with Pomerado Road is severely constrained.

487

487 See response number 421.

Any connection of this project to Beeler Canyon Road/Creek Road would have significant traffic impacts to these roads as it would exceed the threshold set out on (c) page 4.6-12 of the EIR:

488

488 See response number 445.

"If a project would increase traffic hazards to motor vehicles, bicyclists, or pedestrians due to proposed non-standard design features (e.g., poor sight distances,)"

These impacts are not mitigated.

b) The traffic analysis states that traffic volumes on Creek Road will increase from a current 200 daily traffic volume to only 411 at 2020 project build out. If this projection is to be believed, then any connection to Beeler Canyon Road/Creek Road is unnecessary. Table 4.6-16, in fact, indicates that removal of the connection to Creek Road would not result in significant intersection delays or reductions in LOS.

489

489 It is agreed that the closure of Street "B" to emergency-only access would not create new significant adverse impacts, as shown in Appendix K of the Traffic Technical Report.

LETTER OF COMMENT

RESPONSE

- c) The draft EIR notes that Creek Road/Beeler Canyon Road had historically served the former General Dynamics use of the Sycamore Estates portion of the project. However, it should also be noted that General Dynamics also had access to its property from Pomerado Road at the proposed location of Rancho Encantada Parkway. 490
- d) In summary, Beeler Canyon/Creek Road as a project access (pages 4.6-13 & 14 PROJECT TRAFFIC GENERATION) is not a reliable assumption as the basis of this project traffic study. In no way can Creek Road be construed as adequate to serve even as secondary access to a project of this magnitude. 491
- 2) The draft EIR finds that the project will have significant and unmitigated traffic impacts on Pomerado Road. We find no discussion of potential mitigation measures and do not accept that mitigation is not possible. 492
- a) There is ample current evidence, day by day, of the peak hour traffic problems on Pomerado Road, also attested to by the efforts of the Scripps Ranch community dating back ten to fifteen years to restrict additional traffic on Pomerado Road through Scripps Ranch, including limiting Pomerado Road to two lanes. It is inconceivable that this current EIR should now propose adding substantially to this traffic without any significant study or effort to provide additional roadway capacity. These impacts, unfortunately, are not confined to Pomerado Road, but spread to other regional roads including the Scripps Poway Parkway and Scripps Ranch Road. 493

The study indicates to us that the project not only lacks satisfactory secondary access, but lacks adequate primary access as well.
- b) The logical location for the additional access required for the development of this area is a new road from the south westerly end of the project, then proceeding southerly and westerly, entirely to the south of the Scripps Ranch community to connect to the Miramar Way Interchange at Interstate 15. The topography along this route is generally not difficult for road construction and it would be built through vacant land. A new road in this location will serve to: 494
 - (i) be the primary access to the project, with the already impacted Pomerado Road becoming secondary access and the removal of the inadequate Beeler Canyon/Creek Road altogether as a project access.
 - (ii) mitigate the significant, cumulative unmitigated impacts to Pomerado Road and intersections thereon (page 4.6-35).
 - (iii) mitigate significant cumulative impacts at ramp meters at I-15/Pomerado Road (page 4/6-28).
 - (iv) lessen the traffic impact to I-15 traffic north of Miramar Way.

- 490 Comment is noted.
- 491 Creek Road is not intended to serve as a secondary access to Rancho Encantada. Proposed Street "B" would connect to Beeler Canyon Road. See response numbers 403 and 445.
- 492 Significant unavoidable impacts are acknowledged and mitigation measures are identified at the Pomerado Road/I-15 interchange, along Spring Canyon Road, and at the Pomerado Road/Scripps Poway Parkway intersection to lessen these impacts. See response number 418.
- 493 See response number 492.
- 494 See response numbers 152 and 154.

LETTER OF COMMENT

We believe this road is essential to the development proposed and is too important to traffic and, hence, quality of life issues in each of these I-15 corridor communities not to be addressed, or worse, to be dismissed without study.

494

The obvious argument against a road at this location is that the land is part of MCAS Miramar. However, it is clear that there is need for cooperation between the Marine Corps and the City as each seeks to advance its plans for housing in the area.

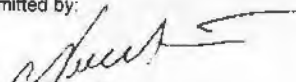
3. The draft EIR dismisses the potential cumulative effects of MCAS Miramar housing by assuming that its access will be via Pomerado Road, a road already identified as being the subject of "direct and cumulative impacts which would remain significant and unmitigated."

495

a) This draft EIR Transportation Section analyzes year 2020 build out with full project build out, but does not appear to analyze the full project build out plus the addition of military multi-family housing on MCAS Miramar, although it is referred to on page 4.6-1. At 1,000 units, the MCAS Miramar project would double the number of units of this EIR. The City has already recognized the likelihood of this additional housing in requiring that sewer system pipelines be sized for future residential development on MCAS Miramar.

We understand that a discussion of this cumulative impact in this draft EIR is a statutory requirement. We believe this discussion is vital to this study as it will not only evaluate the impact on Pomerado Road but may assist in providing a potential mitigation to the "direct and cumulative impacts to Pomerado Road, which would remain significant and unmitigated," (Sec. 4.6-4, page 4.6-37), through a co-operative effort with MCAS Miramar.

Submitted by:


Neville F. Bothwell
5302 Alta Bahia Ct.
San Diego, CA 92109
(858) 488-7675

Anthony J. Aviano
12729 Stone Canyon Rd.
Poway, CA 92064
(858) 487-6675

NB:ka

RESPONSE

495

Section 4.8 of the Traffic Technical Report summarizes the analysis of impacts associated with the Military Family Housing project.

LETTER OF COMMENT

RESPONSE

11015 Beeler Canyon Road
Poway, CA 92064-6110

City of San Diego
Planning & Development Review
1222 First Ave., 5th floor
San Diego, CA 92101

Subject: Environmental impact report Rancho Encantada Precise Plan
LDR No. 99-1094
SCH No. 2000011053

I am a resident of Beeler Canyon. I want to voice my objection to the Encantada project. I believe that the Environmental Impact Report is not accurate, does not adequately describe the environment of Beeler Canyon and does not adequately describe the potential impact of this project. The report does not give serious consideration to the impact of this development on the wildlife, the water and the total ecology of this area. Also, we only found out about the report this week. I understand there will be some sort of vote Friday. When a development has such a potential impact on residents, I would think the City would make sure that the residents were informed all along the process.

496

I would like to describe our environment in Beeler Canyon.

There is a ravine next to our property. When it rains the water comes from the top of the hills down the ravine under the road to a creek across the road. If it rains hard enough there is a little creek that runs down along the ravine but most of it goes to the creek across the road. Every morning and evening animals walk down the ravine, across the road to drink water. There is bush, with no houses, on one side and the back of our two+ acres. The animals live there. In addition to the coyotes, rabbits, squirrels there is a beautiful bobcat. I have seen small deer walking down to the creek. They all depend on good clean water and they need to be protected as they cross the road. There are all types of birds that nest in the canyon. Beautiful hawks, and species too numerous to list. They all depend on good clean water and being able to hunt for food. So the bugs, rodents, frogs and snakes are important also. The snakes cross Beeler Canyon Road also. People walk or ride bicycles on Beeler Canyon Road. Children play. People ride horses. There are only about 12 houses on Beeler Canyon Road - there are perhaps 13 on Creek Road. The residents of Beeler Canyon do not generate very much traffic (the information in the report was incorrect and misleading) and we care about the safety of

497

496

Comments are noted. EIR Section 2.0 and the existing conditions sub-sections of Section 4.0 describe the environmental setting of the proposed project site and vicinity. EIR Section 4.3, BIOLOGICAL RESOURCES, and 4.5, HYDROLOGY/WATER QUALITY, address impacts on wildlife and water, respectively. Also see response number 431.

497

Comments are noted.

LETTER OF COMMENT

RESPONSE

people and wildlife. We try to drive slow so we can stop safely when children are playing on the road or when an animal or snake crosses the road.

497

Beeler Canyon is a little country road. It was a dirt road when we first move in 14 years ago. It has to stay a little country road because if it does not the City of San Diego will be guilty of killing off one more habitat for the wildlife, domestic animals and people trying to survive in the uncontrolled urban sprawl that San Diego has become.

498

This is an accurate description of Beeler Canyon road. If the EIR had adequately described the environment then the negative impact of this development would be obvious. It is unthinkable that Beeler Canyon would ever be used as an access road for this or any other housing project. But even if the traffic is diverted in another direction, I think there will be a very bad impact from the development on the quality of the natural water and creek water flowing thru the canyon. Many deer, bobcats, dogs, snakes, rabbits, hawks, children and people in general will be negatively impacted by this development. Any environmental report should emphasize these consequences.

499

I cannot imagine what the City or anyone else can honestly believe they are going to do with more cars from more houses in this area. They sure cannot go out through Scripps Ranch. Pomerado road is full. You cannot get out of Poway onto I-15 in the morning and can't get back in the evening. There is no place for any more cars to go. I do not believe the report accurately or adequately describes the impact on traffic congestion in Scripps Ranch, Poway, I-15 and surrounding areas.

500

I have serious objections to this development. I am very concerned about the impact on the wildlife and environment in Beeler Canyon. I do not know if there are endangered species in our canyon but I do know that there is a large number and wonderful diversity of life in our canyon. We all deserve your serious consideration.

Yours truly,

Lorraine Chase

Lorraine Chase

498 Comments are noted. Please see response number 57.

499 The EIR adequately discloses the significant environmental effects of the proposed project. See response numbers 365, 414 and 496.

500 EIR Section 4.6 adequately evaluates the proposed project's impacts on transportation in accordance with City of San Diego traffic engineering standards.

LETTER OF COMMENT

RESPONSE



SAN DIEGO AUDUBON SOCIETY

2121 Morena Boulevard, Suite D • San Diego CA 92110 • 619/275-0557

January 4, 2001

VIA FACSIMILE (619-446-5499)

Lawrence C. Monserrate
Environmental Review Manager
City of San Diego
Planning and Development Review Department
1222 First Ave, Fifth Floor
San Diego, CA 92101

Dear Mr. Monserrate:

SUBJECT: Comments on Draft EIR for Ranch Encantada
LDR No. 99-1094

The San Diego Audubon Society submits its comments on the draft EIR for the Rancho Encantada Precise Plan, LDR No. 99-1094.

After review of the Biological Resources Report from Helix Environmental, we are concerned about the lack of concern over the species and their potential to be observed on-site. First of all Table 1 on the Biological Survey Information, there is noted only two California gnatcatcher surveys conducted instead of the required three under the agreement with the U.S. Fish and Wildlife Service and the Implementing Agreement of the Multiple Species Conservation Plan (MSCP) in accordance with the gnatcatcher protocols three visits are required to be covered at a minimum of one week apart. Your table notes a site visit on April 22, 1999 and then again May 6, 1999. There should have been a visit sometime in between these two dates. If a third visit was completed, the table needs to be corrected. If the visit was not done, then the survey is incomplete and in accordance with the protocols, a new set of visits would be required

501

Secondly, the sensitive plant surveys noted on Table 1 were conducted at the end of July and early August 1999. The majority of the plants that are on Table 3-5 of the MSCP that have the potential to be on-site would more like be blooming in the early to late spring time. Why were no surveys conducted during that time? Based on the information that we see here, the sensitive plant surveys are misleading and therefore incomplete. The minimum should be two site visits during the spring season to look for annuals.

502

Thirdly, the flora list indicates the presence of spiny redberry (Rhamnus crocea). This is the host plant for the Hermes copper butterfly (Lycaena hermes). Hermes is listed on Table 3-5 of the MSCP and therefore due diligence should be done to confirm presence or absence of the butterfly. Table 4 in the Biological Report indicates a "low to moderate potential to occur." When you go back to Table 1 of the Report, there is no indication of a presence / absence survey being conducted. The butterfly does occur nearby at Sycamore Canyon County Park and on the Marimar Marine Airbase. What is the logic in concluding that it is low to moderate for occurrence? Without a survey for them it must be

503

501

Coastal California gnatcatcher surveys are not required for impact areas outside of the MHPA. Gnatcatcher surveys were conducted however for the entire Montecito site on three occasions in 1999 for CEOA purposes and because appropriate habitat for gnatcatchers was located on the project site. One date, April 14, 1999, was inadvertently left off of Table 1. Additionally, the site was covered on many other occasions during Quino checkerspot butterfly and rare plant surveys by biologists permitted to survey for the gnatcatcher in both 1999 and 2000, and no gnatcatchers were observed. Based on these survey efforts, no gnatcatchers are anticipated on the Montecito sub-project site.

502

The site was covered repeatedly by biologists familiar with the rare plants expected to occur on site during April of 2000 as part of the Quino checkerspot butterfly surveys. Additionally, a rare plant survey was conducted in May of 2000 on 40 acres of the site. Any rare plant species would likely have been detected during these of survey efforts.

503

Surveys for the Hermes copper butterfly are not required for projects within the City of San Diego. It was determined that this species has low to moderate potential to occur because spiny redberry does occur on site, although not in large numbers. Disclosure of the potential to occur was provided. Even if this species were to be observed on-site, it would not result in any project modifications because the species is not state or federally listed and is not a narrow endemic species.

LETTER OF COMMENT

From Michael W. Klein To Laurence C. Monserate

Date: 01/08/2001 Time: 8:58:44 AM

Page 2 of 3

concluded that this is incomplete. It is strongly recommended that a survey be conducted during its adult flight season to confirm presence or absence.

503

Finally, with nine significant unmitigated impacts and even with alternatives to the project there are still six significant unmitigated impacts, it seems clearly inappropriate to move forward with this project. It is recommended that the City work with the developer to reduce the unmitigated impacts to no impacts and then resubmit to the EIR to the public.

504

If you have any questions, I can be reached at 619-282-8687.

Respectfully,

Michael W. Klein
Land Use Conservation Chair
San Diego Audubon Society

RESPONSE

504 The comment is noted.

LETTER OF COMMENT



San Diego County Archaeological Society

Environmental Review Committee

3 January 2001

To: Mr. Drew Kleis
Land Development Review Division
Planning and Development Review Department
City of San Diego
1222 First Avenue, Mail Station 501
San Diego, California 92101

Subject: Draft Environmental Impact Report
Rancho Encantada Precise Plan
LDR No. 99-1094

Dear Mr. Kleis:

I have reviewed the subject DEIR on behalf of this committee of the San Diego County Archaeological Society.

Based on the information contained in the DEIR and its Technical Appendices H1 through H5, we have the following comments:

- (1) Please confirm whether aerial photographs were inspected for the areas covered by Appendices H1 through H5
(2) Cultural material and associated records from the fieldwork covered by the appendices should be properly curated. Appendix H5 mentions that collections are "temporarily curated" at Kyle Consulting. Consistent with the Code of Ethics of the Register of professional Archaeologists, curtion arrangements should be made.
(3) Other than the above, we concur in the impact analysis and mitigation measures presented for this project.

Thank you for providing this project's environmental documents to SDCAS for review.

Sincerely,
James W. Royle, Jr., Chairperson
Environmental Review Committee

cc: Kyle Consulting
Brian F. Smith and Associates
SDCAS President
File

San Diego County Archaeological Society
P.O. Box 31125 San Diego, CA 92108-1104 (619) 528-0935

RESPONSE

- 505 For EIR Appendix H1, Brian Smith and Associates did not evaluate aerial photography. For EIR Appendices H2 through H5, Kyle Consulting examined 1928 aerial photographs for cultural resources located within the study areas. This was completed during the survey phases of the study and reexamined during the testing phase.
506 The recovered cultural material was temporarily curated at Kyle Consulting and at the laboratory of Adella Schroth, Ph.D. who conducted the lithic analysis. The artifacts would be curated at the San Diego Archaeological Center, 334 Eleventh Avenue, San Diego, California 92101.
507 Comment is noted.

LETTER OF COMMENT

RESPONSE

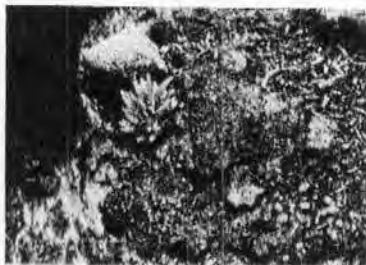
To Whom It May Concern:

On June 14th a fire burned about 100 acres of the land on which Rancho Encantada (Montecito/Sycamore Estates) has been proposed. We have been exploring that area. Fire is a very important process in the chaparral community. Thus it is important that this area be preserved, so that it can grow back -- as it is already beginning to do -- and so that animals may utilize the new growth and open space. As it stands now, the burned area contains much active life, from rodents, lizards, and birds to deer and coyote.

508

The fire burned many areas of oak woodland, a very rare habitat in this region. These regions are for the most part growing back, which is further reason for this area to be protected.

509



Examination of Burn:



Of the 100 acres burned, most was Coastal Sage Scrub, Southern Mixed Chaparral and Chamise Chaparral. About 80% of the Oak Woodland marked in the Environmental Impact Report (EIR) prepared by Helix Environmental Planning was also burned. The Chaparral populations and Oak Woodlands are slowly re-growing via crown sprouting. The actual extent of the Oak Woodland far exceeds that marked in the EIR (Biological Resources Map 4.3-2). Based on observation of tree skeletons and crown sprouting, Oak Woodland populations appear to have extended up each ravine and along Beecher canyon.

508

The public review period for the Rancho Encantada EIR ended on January 19, 2001. This comment letter was received on January 23, 2001; therefore, responses are not required. As a courtesy to the commenter, responses are provided below for informational purposes only.

509

Comments noted. Please see responses numbers 361 and 364.

road. While most of this population was burned, a good percentage appears to be growing back by crown sprouting.

509



There is also an unburned ravine directly after the General Dynamics service road that contains a full, living population of Oak. This area was not burned by the fire.

It should be noted that all oak woodland populations reside on the lower slopes of hills and in the bottoms of ravines.

The burned area is not at all lifeless, as one would expect a burned area to be. Animals are returning in abundant numbers in response to the new growth. There is evidence of deer, coyote, lizard, rodents, and raptors and other birds. Paw prints, scat, and sightings provide our evidence.

Construction Impact

Being at the bases of hills and ravines, any oaks remaining after the fire and after construction would be in a very vulnerable position. They would be exposed to pollution from run off from houses and streets above them, and would also be threatened by erosion from the manufactured slopes and filled in areas necessary to the housing construction. The road on Beeler Canyon would need to be widened to account for the new traffic. This would negatively affect the oaks along this road. Young oaks just sprouting and the damaged oaks may not be able to survive these factors.

510

510

The project's potential effects due to site runoff, including erosion, are fully addressed by the incorporation of BMPs and detention basins into the design of the project. The project design allows for the treatment of runoff from the site before it is discharged to surface and groundwater bodies. Also, Beeler Canyon Road is not proposed to be widened in conjunction with the proposed project. Therefore, it is concluded that the EIR fully addresses the project's potential effects to oaks, both on- and off-site. Also see response numbers 361, 364 and 365.

LETTER OF COMMENT

RESPONSE

Existing oaks will be boxed in a closed space by roads and houses on all sides. They will have little chance of expanding their population or of surviving the construction impact on all sides and the human contact after the houses are built. Both the currently proposed plan and the Reduced Plan alternative would cause serious damage to the Oak woodland population in this area. However, the currently proposed plan would cause by far the most damage to this population, covering up almost half of the re-growing oak as well as the undamaged oak.

510

We have drawn some sketchy maps for your convenience. Please look them over, and compare them to the maps created by Helix Environmental Planning. We marked the burned and unburned oak woodland on top of the reduced plan project, as well as the currently proposed plan.

Sincerely

Paula Schaffer *William Clark*

Paula Schaffer and William Clark

Index of Maps and Pictures:

Map 1: Oak Woodland Population overlaid on Current Proposal Impact map
Map 2: Oak Woodland Population overlaid on Reduced Impact construction area map
Map 3: Approximate Burned area

Picture 1: Crown Sprouting Evidence/ Example
Picture 2: Scene from Burned Area- Chaparral Environment
Picture 3: Oak Woodland Example

All photos were taken after the fire occurred, in August through November of 2000

If you have any questions please do not hesitate to contact

Paula Schaffer:
Telephone: (858) 530-1857
e-mail: gsartica@sanada.com

William Clark:
Telephone (858) 549-9838
e-mail: jaxiaman@hotmail.com

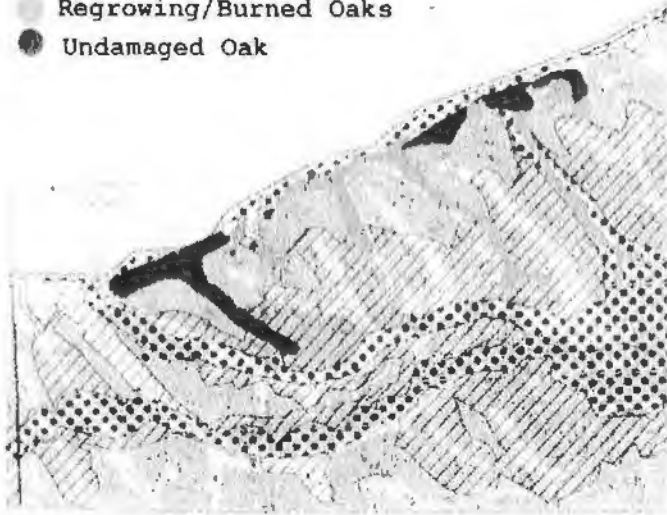
Report, Photo's and Maps prepared by Paula Schaffer and William Clark

LETTER OF COMMENT

Map 1: Oak Woodland Population Overlaid on Current Proposal
Impact Map

Legend

- Regrowing/Burned Oaks
- Undamaged Oak



RESPONSE

LETTER OF COMMENT

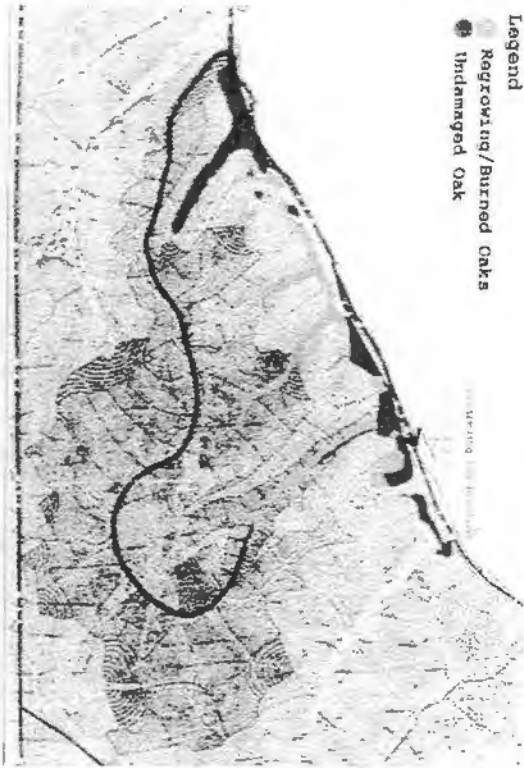
RESPONSE

Map 3: Approximate Banned Area



Map 2: Oak Woodland Population Overlaid on Reduced Impact Construction Area Map

- Legend
- Regrowing/Burned Oaks
 - Undamaged Oak



LETTER OF COMMENT

RESPONSE

ON 07/01/03 10:31 AM 10622705 FROM: NORTHERN COMPANIES TO: 2/5/04 1:04

BOARD OF EDUCATION: JEFF BARNON, DICK BARNER, ANDREW PATRICH, FRANK HANFORD, JOHN VAUGHAN
POWAY UNIFIED SCHOOL DISTRICT
10680 TWIN PEAKS ROAD • POWAY, CALIFORNIA 92064-3008
TELEPHONE (619) 746-0010 • (619) 586-7100 • FAX (619) 746-1542
DR. ROBERT L. REEFER, SUPERINTENDENT OF SCHOOLS
WEB SITE: <http://powayusd.ednet.ca.k12.ca.us>

...serving the communities of Poway, Rancho Bernardo, Rancho De Las Penasquitas, Sharp Springs, and Carmel Mountain Ranch

PLANNING DEPARTMENT
1222 FIRST AVENUE, 5TH FLOOR
SAN DIEGO, CA 92101-4155



February 5, 2001

Lawrence C. Monserrate, Environmental Review Manager
Planning and Development Review Department
City of San Diego
1222 First Avenue, 5th Floor
San Diego, CA 92101-4155

ATT: Drew Klex

RE: DRAFT ENVIRONMENTAL IMPACT REPORT LDR No. 99-1094
SCH No. 2000011053
RANCHO ENCANTADA PRECISE PLAN
Montecito Ranch and Sycamore Estates Projects

It has been requested that Poway Unified School District provide clarification on several issues raised by the Scripps Ranch Community Planning Group in their comments to the Rancho Encantada EIR document. Although the comments submitted by the Community Planning Group are not misrepresentations of information provided by the District Planning Department, it is important that additional information be provided to clarify the intentions of the District and the goals of the project.

511

Statement. Draft EIR 4.11-9 top paragraph, states that "the conveyance of [an elementary school site] to the Poway Unified School District would reduce the project's cumulative impact on elementary school capacity to below a level of significance."

The draft EIR implies that provision of an elementary school campus on this project site is a necessary objective (draft EIR page 3.1). However, in discussions with Ms. Burgoyne, Poway School District, she disclosed that the Poway Unified School District does not require that the Rancho Encantada project provide land for the elementary school on the project site. The school district can instead identify impact fees, which will compensate for acquisition of a differently-located school, or expansion of other already-existing or planned schools. This fact is not disclosed in the draft EIR, but should be, as project alternatives which do not include a school campus can be more accurately analyzed for related traffic impact.

511

The public review period for the Rancho Encantada EIR ended on January 19, 2001. This comment letter was received on February 9, 2001; therefore, responses are not required. It should be noted, however, that this letter addresses issues related to public school facilities and services raised in comment numbers 217 through 222.

Sycamore Estates EIR Response 2101
 February 5, 2001
 Page 2 of 3

reduction, as well as reduction of other related impacts such as air quality. (In oral presentations to the Scripps Ranch community, the project applicants have represented that their project homes would generate 75% of the enrollment of the on-project elementary school. However, the figures of the draft EIR [p. 4.11-8 et. seq.] indicate that elementary enrollment generated by this project would total 439 students at build-out. Per Ms. Burgoyne, the planned enrollment capacity of a Poway Unified School District elementary school is 770 students; the draft EIR cites up to 800 students. Thus, this project is projected to generate about 55% of school enrollment at build-out. This difference may alter projections of traffic trips projected to be generated by the school use as part of this project as proposed.) Project objectives as presented in the EIR (p. 3-1) and elsewhere, including in alternatives analyses) should analyze the exclusion of a school campus on site.

511

Pursuant to Education Code §17620(a)(1), the governing board of any school district is authorized to levy a fee, charge, dedication, or other requirement against any construction within the boundaries of the district for the purpose of funding the construction or reconstruction of school facilities. Due to the overcrowded conditions at the community schools currently serving the Rancho Encantada boundaries, any students generated by the Project could not be provided assurances that they would be accommodated at these schools. The alternatives would be bussing to less impacted schools or adding portable classroom buildings as necessary to already overcrowded sites. This was previously addressed in letters to the City of San Diego on 1/24/2000 and again on 3/10/2000. Schools currently serving this projected development are impacted as listed below:

SCHOOL	ADDRESS	GRADES	DESIGN CAPACITY	CURRENT ENROLLMENT	% ±
Valley Elementary	1300 Bowen Road, Poway	K-5	721	720	0%
Meadowbrook Middle School	12320 Meadowbrook Land, Poway	6-8	1430	1457	2.5%
Poway High School	15300 Espala Road, Poway	9-12	1873	3217	73.16%

In accordance with District Master Plan guidelines all efforts are directed toward identifying sites in advance of need. Whenever development studies are undertaken by landowners or developers, the District requests that a suitable number of school sites be identified in the specific and/or community plan and reserved for the District. School sites are to be selected to serve a specific attendance area in the best possible manner in order to allow students to be within walking distance of the school when possible. Each new development project is also analyzed as to its impact on the District's educational

LETTER OF COMMENT

Sycamore Estates EIR Response 2101
 February 5, 2001
 Page 3 of 3

facilities including the estimated number of residential units, timing of building and number of students to be generated from the development. The District and McMillin Land Development worked cooperatively to select an acceptable school site that would meet these guidelines and meet the California Department of Education's requirement of 12.5 net useable acres. McMillin and the District are also continuing to work on the formation of a Community Facilities District and acquisition agreement for the school site in order to mitigate the project's school facilities impacts. In a good faith effort, McMillin has provided funds to cover costs incurred by the District for consultants to review the formation proposal and other school facility mitigation impact proposals.

511

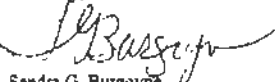
School facilities impacts generated from this development would be as follows:

	K-5	6-8	9-12	TOTAL
Sycamore Estates	208	108	155	471
Montecito	94	50	38	182
Total	302	158	193	653
% Enrollment	43.08%	11.45%	09%	
School Capacity	701	1380	2140	

Hopefully this will further clarify some of the concerns that the Scripps Ranch Community Planning Group. Additionally, please be advised that the District did receive a draft EIR on December 8, 2000.

The District appreciates the opportunity to provide further clarification on these issues. If you have any further questions or require any additional information, please call me at (619) 748-0010, extension 2110.

Sincerely,



Sandra G. Burgoyne
 Planning Analyst

Cc: Jeff Brazel, McMillin Land Development
 Bob Ilko, Chair, Scripps Ranch Planning Group
 Peggy Shirey, Chair, Miramar Ranch North Planning Group
 Rob Ball, Assistant Superintendent, DSS

\\PLANNING\Burgoyne\CTD\11\EIR_Response\01-26

RESPONSE

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Executive Summary

Introduction

This Environmental Impact Report (EIR) is an informational document intended for use by the City of San Diego, decision makers and members of the general public in evaluating the potential environmental effects of the proposed *Rancho Encantada* project and the Montecito and Sycamore Estates sub-projects. This document has been prepared in accordance with the guidelines for the preparation of EIRs issued by the City of San Diego and complies with all criteria, standards and procedures of the California Environmental Quality Act (CEQA) of 1970 as amended (PRC 21000 *et seq*) and State CEQA Guidelines (CAC 15000 *et seq*). Per Section 21067 of CEQA and Sections 15367 and 15050 through 15053 of the State CEQA Guidelines, the City of San Diego is the *Lead Agency* under whose authority this document has been prepared.

Background

The *Rancho Encantada* project site is located in the Future Urbanizing Area (FUA) of the City of San Diego, and is comprised of three land areas: Montecito (278 acres), Sycamore Estates (2,132 acres) and a City of San Diego owned parcel (248 acres). Individual Planned Residential Development Permit (PRD) applications and Vesting Tentative Map (VTM) applications for the Montecito and Sycamore Estates sub-projects were deemed complete in March and September 1999, respectively. Because the applications were deemed complete prior to the effective date of the City's Land Development Code (January 1, 2000), the Project is subject to the City's Municipal Code requirements in effect prior to January 1, 2000.

In response to requests for a comprehensive planning effort, the City requested that the Montecito and Sycamore Estates sub-project applicants prepare a unified plan for development of the 2,658-acre Rancho Encantada project site. The applicants agreed to the preparation of a unified Precise Plan, while their PRD and VTM applications remain independent from one another.

Council Policy 600-29, "Maintenance of the Future Urbanizing Area as an Urban Reserve," was enacted to avoid premature urbanization in the City's FUA. Council Policy 600-29 permits four development options on property located in the FUA which is zoned agricultural. One of these options is Rural Cluster Development. Under this option, development is permitted at the density permitted by the property's underlying zone, but clustered in order to promote more efficient land utilization and land conservation. The proposed Project is not proposing a phase shift via a citywide vote per the Managed Growth Initiative, but instead proposes development in accordance with Council Policy 600-29. The Montecito sub-project would develop under its existing RS-1-8 zone (formerly R1-40,000 under the pre-2000 City Municipal Code [CMC]) and the Sycamore Estates sub-project would be developed under a proposed rezone to AR-1-1 (formerly A-1-10 under the CMC).

Environmental Setting

The project site is located east of Pomerado Road and south of Beeler Canyon Road, approximately two miles east of Interstate 15 (I-15). The site is bordered on the north by the City of Poway and on the west by the City of San Diego communities of Scripps Ranch and Miramar Ranch North. The Sycamore Canyon County Open Space Preserve lies to the east; to the south is the United States Marine Corps Air Station (MCAS) Miramar.

Except for private roads, trails, fire breaks, SDG&E easements, one existing residence on the Montecito sub-project site, and five existing industrial use areas on the Sycamore Estates sub-project site, a majority of the site and undeveloped natural open space. The landform is characterized by narrow divides, v-shaped valleys, and steep side slopes. The elevation of the property ranges from approximately 1,177 feet above mean sea level (AMSL) in the northeastern portion of the site to 600 feet AMSL in the northwestern portion. The northern portion of the Montecito sub-project site, the eastern portion of Sycamore Estates sub-project site (with the exception of an approximate 34-acre "island" containing existing industrial use areas and fire breaks), and the entire City of San Diego owned parcel (with the exception of a road crossing) are located within the City of San Diego's Multiple Habitat Planning Area (MHPA). Vegetation on the site includes nine primary vegetation communities and areas defined as unvegetated waters of the U.S. A portion of the east-west Beeler Canyon wildlife corridor is located along the property's northern boundary and a portion of the north-south Sycamore Canyon wildlife corridor is located in the far eastern portion of the project site.

Some areas proximate to the site are planned for future development. The San Diego County Water Authority has proposed several alternative water pipeline alignments in the vicinity of the project site. Three of these alternatives traverse or are adjacent to the proposed project site. Also, the United States Marine Corps is evaluating plans to develop up to 1,600 military housing units on a portion of MCAS Miramar and has identified four potential sites of which one is adjacent to the Montecito sub-project site.

Project Description

The proposed *Rancho Encantada* project proposes a Precise Plan that would serve as the City of San Diego's detailed long-range plan for the development of the 2,658-acre project area. The Precise Plan proposes 835 single-family lots, two institutional sites, 106 multi-family units, an elementary school site and a park site clustered into 12 planning areas. Approximately 75 percent of the site would be retained as open space. Rancho Encantada Parkway is proposed to be constructed on-site as the main east/west access road, with a connection at Pomerado Road. A secondary access would connect with Beeler Canyon Road to the north. The Precise Plan also plans for utility improvements and a trail system. A Resource Protection Ordinance (RPO) permit and a Multiple Habitat Planning Area (MHPA) Boundary Adjustment are required to implement the Precise Plan.

In addition to the Precise Plan, an independent PRD Permit and VTM is proposed for the Montecito sub-project and two independent PRD Permits and one VTM are proposed for the Sycamore Estates

sub-project. It is important to note that the PRDs and VTMs proposed for the Montecito and Sycamore Estates sub-projects are being processed by the City independently from one another, are evaluated by this EIR as independent implementing actions, and may proceed independently from one another.

Montecito Sub-Project

The Montecito PRD and VTM designate 277 single-family lots and one 1.7-acre lot to accommodate an existing on-site residence, as well as several open space lots and one lot reserved for a sewer pump station. The Montecito PRD proposes 81 lots having a minimum lot size of 5,000 square feet, 80 lots having a minimum lot size of 6,000 square feet, 55 lots having a minimum lot size of 7,000 square feet and 61 lots having a minimum lot size of 9,600 square feet. Grading is proposed on approximately 153 acres, including all utility improvements and detention basins, with a balanced grading operation of approximately 3.6 million cubic yards of cut and fill. Off-site improvements are proposed west of the site, including improvements to the Pomerado Road/Rancho Encantada Parkway intersection.

Sycamore Estates Sub-Project

The Sycamore Estates PRD and VTM designate 557 single-family lots, one affordable housing site, a school site, a public park site, and two institutional sites, as well as several open space lots, one lot reserved for a proposed water storage reservoir, and two lots designated for water pump stations. Of the 557 single-family residential lots, 284 lots are proposed to have a minimum lot size of 9,600 square feet and 273 lots are proposed to have a minimum lot size of 12,000 square feet. The affordable housing site is proposed on 9.9 acres and would accommodate 106 multi-family units. Grading is proposed by the VTM on approximately 540 acres, including all utility improvements, drainage and detention basins; however, this EIR evaluates a 590-acre disturbance area on Sycamore Estates to account for potential construction-related impacts. The VTM proposes approximately 14.9 million cubic yards of cut and fill. A rezone to AR-1-1 (formerly A-1-10 under the CMC) is necessary to implement the Sycamore Estates PRD and VTM.

If the Sycamore Estates sub-project develops prior to development of the Montecito sub-project, it may be necessary for the developers of Sycamore Estates to construct a sewer pump station on the Montecito site and to construct Rancho Encantada Parkway across the Montecito sub-project site to gain access. In this case, the construction of the sewer pump station and Rancho Encantada Parkway across the Montecito sub-project site and related improvements to the Pomerado Road/Rancho Encantada Parkway intersection would be regarded as off-site improvements of the Sycamore Estates VTM.

Off-Site Improvements

As a design option of the proposed Project, a gravity sewer system located off-site and in the City of Poway has been analyzed in this EIR, in addition to a lift station design option on the Montecito sub-project site. The off-site gravity sewer improvements would be necessary starting at the intersection of Beeler Canyon Road and Creek Road. At this point, a new sewer line would be installed to follow

Creek Road northwest for approximately 2,120 feet, at which point it would enter private property for approximately 1,100 feet. The new sewer line would then continue northwest through private property for an additional 920 feet, reaching Stage Stop Road, which it would follow for approximately 1,200 feet. At this point, the new line would reach Old Pomerado Road and follow it north for approximately 4,540 feet. At the intersection of Pomerado Road and Oak Knoll Road, the proposed sewer line would be connected with the existing sewer system. Other off-site improvements in the City of Poway consist of roadway improvements required as Project mitigation. These improvements would be construction within existing right-of-way pavement widths; therefore, environmental impacts are not anticipated. Because the above described improvements are located in the City of Poway, the City of Poway would serve as a Responsible Agency.

Environmental Analysis

Land Use

The project site is surrounded by developed land areas to the west and northwest, and undeveloped land (predominantly open space) to the northeast, east and south. The western border of the site is formed by Pomerado Road. Immediately west of Pomerado Road is the community of Scripps Miramar Ranch. The community of Miramar Ranch North is located north of Scripps Miramar Ranch, with the easterly edge of Miramar Ranch North located approximately ½-mile from the project site. These communities are predominantly residential in the vicinity of the project site, but also include significant commercial and employment land uses. The northerly edge of the Montecito sub-project site lies at the bottom of Beeler Canyon and several single family residential lots of one acre to over four acres in size are located in this area. The northerly edge of the Sycamore Estates sub-project site coincides with the Beeler Canyon Road right-of-way. The Palomar Transit Mix quarry, a resource extraction site, also is located north of the Sycamore Estates sub-project's northwestern property boundary. North of Beeler Canyon Road the land contains manufactured slopes and natural slopes that rise from Beeler Creek to the 700-acre South Poway Business Park in the City of Poway. East of the site is the Sycamore Canyon County Open Space Preserve that is managed by the County of San Diego Department of Parks and Recreation. North of the open space preserve are rural residential homes and ranches located in unincorporated San Diego County. On the immediate south is a portion of MCAS Miramar that is generally undeveloped and used for military training purposes.

Residential development within the *Rancho Encantada* Precise Plan is proposed in the western and central portions of the project site and would be surrounded by open space on all sides, with the exception of development proposed on the Montecito sub-project site adjacent to Pomerado Road to the west at rural residential lots to the north. Development on the Montecito sub-project site would be located an average of 500 feet south of the existing rural residential uses located along Beeler Canyon Road, and an average of 100 feet higher in elevation. The linear and elevational distance provides an adequate buffer at the northwestern project boundary, and land use compatibility impacts would not occur. Because the remaining proposed development areas would be buffered and separated from adjacent land uses by large expanses of open space, no land use compatibility impacts are anticipated to occur at the project edges.

The proposed Project would implement a majority of the environmental goals, objectives and recommendations of the Progress Guide and General Plan. The Sycamore Estates sub-project would not be consistent with the Industrial Element of the Progress Guide and General Plan, however, due to its proposed rezone from IL-3-1 and IH-2-1 (formerly M-1A and M-1B) to AR-1-1 (formerly A-1-10), this is regarded as a significant direct land use impact. Direct and cumulative impacts associated with landform alteration and visual quality, and cumulative, unmitigable impacts that are associated with loss of non-native grassland (raptor foraging habitat), hydrology/water quality, traffic on Pomerado Road, air quality, paleontological resources, landfill capacity, water conservation and aggregate resources would be significant and inconsistent with the City's General Plan provisions.

Rancho Encantada is consistent with Council Policy 600-29, in that it proposes clustered development and preserves large expanses of open space. The proposed project is not proposing a phase shift via a citywide vote per the Managed Growth Initiative, but instead proposes development in accordance with Council Policy 600-29. The Montecito sub-project would develop under its existing RS-1-8 (formerly R1-40,000) zone and the Sycamore Estates sub-project would be developed under a proposed rezone to AR-1-1 (formerly A-1-10).

The City of San Diego regulates development of environmentally sensitive lands through the Resource Protection Ordinance (RPO). Adoption of a long-range plan, such as the proposed *Rancho Encantada* Precise Plan, is subject to Municipal Code §101.0426.0023, which states that where a RPO Permit is requested concurrently with the processing of a project-specific land use plan, the boundaries of the RPO Permit will be the boundaries of the entire project-specific land use plan, including all individual interior lots. Thus, one RPO Permit is being requested for the *Rancho Encantada* Precise Plan as a long-range planning document. Council Policy 600-40 requires a thorough analysis of opportunities and constraints of a development area, including resources that are considered sensitive by RPO. If future or concurrent project or permit applications within *Rancho Encantada* are found to be consistent with the *Rancho Encantada* Precise Plan, then RPO permits for the individual sub-projects may be approved using the substantial conformance determination referenced in the alternative compliance subsection of the RPO. The Project would be within the encroachment allowances for steep slopes and sensitive biological resources, but would be inconsistent with RPO due to wetland impacts, which are not permitted by RPO.

As part of the proposed Project, an MHPA boundary adjustment is proposed that would reduce the size of the MHPA by 15.9 net acres on the Montecito sub-project site and increase its size by 368.6 acres on the Sycamore Estates sub-project site. Because the size of the MHPA would be substantially increased and that habitat value would be greater, impacts would not be significant and would be considered beneficial. The *Rancho Encantada* Project would be consistent with the MHPA Adjacency Guidelines, with the incorporation of mitigation measures identified in Sections 4.3, 4.5 and 4.7.

Landform and Visual Quality

Topography and elevation of the site are varied. The landform is characterized by many narrow divides, v-shaped valley bottoms and steep side slopes. The elevation of the property ranges from

approximately 1,177 feet above mean sea level (AMSL) in the northeastern portion of the site to 600 feet AMSL in the northwestern portion. Slopes of the natural hillside terrain typically range from 2:1 (horizontal to vertical) to 4:1. The project is visible from public trails in the Sycamore Canyon County Open Space Preserve to the east and from existing public rights-of-ways, including Pomerado Road to the west and Beeler Canyon Road and Scripps Poway Parkway to the north.

On the Montecito sub-project site, grading is proposed on approximately 153 acres and consisting of 3.6 million cubic yards of cut and fill. Several manufactured slopes would be created along the development area boundaries, with a maximum height of approximately 125 feet. On the Sycamore Estates sub-project site, grading is proposed on 590 acres consisting of 14.9 million cubic yards of cut and fill. Manufactured slopes would reach maximum heights of approximately 205 feet. Landform alteration impacts would be direct and cumulatively significant because the Project would result in the creation of manufactured slopes higher than ten feet and would result in a change in elevation of steep natural slopes (25 percent gradient or steeper) from existing grade to proposed grade of more than five feet by either excavation or fill. The Project also would grade more than 2,000 cubic yards per graded acre. Landform alteration impacts would be partially reduced by contour grading, but the direct and cumulatively significant impacts would be unmitigable.

The proposed Project would change the visual appearance of the site from predominantly vacant open space to that of a developed residential community surrounded by open space. The development of the community would not block public views or have a substantial adverse visual impact; however, because the appearance of the site would appear monotonous from a distance and would change from that of a largely natural view to a view of development, a direct and cumulatively significant unmitigable visual quality impact would result.

Biological Resources

Montecito Sub-Project:

Impacts to 0.01-acre of wetland habitat, 39.4 acres of Tier II habitat, 108.5 acres of Tier IIIA habitat and 2.7 acres of Tier IIIB habitat, including off-site impacts to 0.5-acre of Tier IIIA habitat on the Sycamore Estates sub-project site, would be regarded as significant direct impacts. If the Montecito sub-project precedes the Sycamore Estates sub-project, an additional 1.5 acres of Tier IIIA habitat on the Sycamore Estates sub-project site would be impacted by the Montecito sub-project. This would also be regarded as a significant direct impact. Mitigation for Montecito consists of onsite preservation of 17.5 acres of Tier II habitat, 65.3 acres of Tier IIIA habitat and 5.6 acres of Tier IIIB habitat inside the MHPA. In addition, 5.5 acres of Tier II habitat shall be preserved off-site inside the MHPA. Wetlands would be mitigated through on-site creation.

Direct impacts would occur to approximately 11 San Diego barrel cactus and numerous ashy spike-moss; however, because of their low sensitivity, impacts are not regarded as significant. Cumulative impacts to raptor foraging habitat (coastal sage scrub and non-native grassland habitats primarily) would occur due to the loss of Diegan coastal sage scrub and non-native grassland habitats. This impact is

regarded as cumulatively significant. Direct impacts would occur to the San Diego horned lizard, orange-throated whiptail, Cooper's hawk, southern California rufous crowned sparrow and San Diego black-tailed jackrabbit. Impacts to these species are not considered significant because the San Diego horned lizard and the Cooper's hawk are covered species under the MSCP and the other species have a low sensitivity status. If active raptor nests are found on- or off-site in areas proposed for construction, impacts to occupied raptor nests would be regarded as significant and mitigation (avoidance) would be required. Indirect impacts, including potential construction and post-construction impacts to wetlands with less than 100-foot buffers, would be considered significant, but mitigable with the installation of silt fences during construction and the preservation of buffers between development and preserved wetlands after construction.

A 348.3-acre net increase in the size of the MHPA would occur as a result of the proposed MHPA boundary adjustment. If the Montecito sub-project developed independent of the Sycamore Estates sub-project, the MHPA would be reduced by 15.9 acres, resulting in a significant impact. This would require off-site acquisition of 15.9 acres within the MHPA.

Direct and indirect biological resources impacts would be mitigated to below a level of significance. Loss of non-native grassland (raptor foraging habitat) would be cumulatively significant and unmitigable.

Sycamore Estates Sub-Project:

Impacts to 0.53 acres of wetland habitat, 4.4 acres of Tier I habitat, 144.7 acres of Tier II habitat, 363.6 acres of Tier IIIA habitat, and 4.1 acres of Tier IIIB habitat on the Sycamore Estates sub-project site would be regarded as significant direct impacts to sensitive habitat. If the Sycamore Estates sub-project develops prior to the Montecito sub-project, grading and construction of Rancho Encantada Parkway across the Montecito sub-project site would be regarded as off-site improvements of the Sycamore Estates VTM. Impacts to 13.7 acres of Tier II habitat and 24.1 acres of Tier IIIA habitat resulting from the construction of Rancho Encantada Parkway would be regarded as significant. Mitigation for Sycamore Estates consists of onsite preservation of 4.4 acres of Tier I habitat, 72.0 acres of Tier II habitat, 252.9 acres of Tier IIIA habitat and 3.8 acres of Tier IIIB habitat. Wetlands would be mitigated through on-site creation.

Impacts would occur to approximately 39 San Diego barrel cactus and numerous ashy spike-moss; however, because of their low sensitivity, impacts are not regarded as significant. Indirect impacts may potentially occur to variegated dudleya as a result of the Sycamore Estates sub-project, which is considered a significant indirect impact. Impacts would occur to an individual coastal California gnatcatcher outside of the MHPA. Impacts to the coastal California gnatcatcher are considered significant; however, it is a covered species under the MSCP and is considered adequately mitigated through the sub-project's conformance with the MSCP and the City's habitat and species-specific mitigation requirements. Impacts to the coastal western whiptail, California horned lark, grasshopper sparrow, and southern California rufous-crowned sparrow are not considered significant due to their low sensitivity status and/or because they are covered species under the MSCP. Cumulative impacts to

raptor foraging habitat would occur due to the loss of Diegan coastal sage scrub and grassland habitats; and significant direct impacts would occur if occupied raptor nests are located in or near construction areas. Indirect impacts to the Mission Canyon blue cup would not be considered significant because the drainage hydrology of this population would not be affected. Potentially significant but mitigable indirect impacts to variegated dudleya, an off-site population of willow monardella and wetlands with less than 100-foot buffers would also occur.

The Sycamore Estates sub-project proposes an MHPA boundary adjustment that would increase the size of the MHPA in the Project by 348.3 net acres. This increase would be regarded as a positive effect to the City's MHPA.

Direct and indirect biological resources impacts would be mitigated to below a level of significance. Loss of non-native grassland (raptor foraging habitat) would be cumulatively significant and unmitigable.

Sewer Design Options

Implementation of the gravity sewer option would impact 0.08-acre of wetland habitat, 0.3-acre of coast live oak woodland, 0.1-acre of Diegan coastal sage scrub, and 0.1-acre of non-native grassland which are considered sensitive habitats within the City of Poway. Mitigation would include creation of 0.9 acres of coast live oak woodland and preservation of 0.3 acres of other upland vegetation. Wetlands would be mitigated through creation to below a level of significance.

Implementation of the sewer pump station option would impact 0.02-acre of wetland habitat, 0.8-acre of Diegan coastal sage scrub, 0.1-acre chamise chaparral and 0.1-acre of non-native grassland on the Montecito sub-project site. Impacts would be mitigated to below a level of significance through on-site preservation of 0.8-acre of Tier II habitat, 0.1-acre of Tier IIIA habitat and 0.1-acre of Tier IIIB habitat, and wetland creation pursuant to City of Poway requirements.

Geology / Soils

The *Rancho Encantada* site is characterized by several north-south trending ridges that are separated by canyons and ravines. Beeler Canyon abuts the project site to the north, and the northern portion of the site drains toward Beeler Canyon. The southern portion of the site drains to Sycamore Canyon, located south of the property. Three geological formations and nine surficial units were observed and mapped on-site. The geological formations consist of the Eocene-aged Stadium Conglomerate, Pomerado Conglomerate and Cretaceous-age igneous granitic rock of the Southern California Batholith. The surficial materials consist of undocumented fill, compacted fill, previously placed fill, topsoil, alluvium, debris flow materials, landslide debris, stream terrace deposits and colluvium.

The nearest known active fault is located 12 miles from the *Rancho Encantada* site and the site could be subject to moderate to severe ground shaking in the event of a major earthquake. The seismic risk for the project area is not considered to be significantly different from that of surrounding develop-

ments. Because a portion of the Sycamore Estates site is located in Hazard Category 22 (landslide with moderate risk) and Hazard Category 23 (slide prone areas), geologic hazard impacts would be regarded as potentially significant, unless adequately mitigated. The proposed Sycamore Estates VTM proposes substantial grading in the area of existing debris flow that would either completely remove the debris flow material, or would result in relatively flat areas. Therefore, grading as proposed by the Sycamore Estates VTM would avoid by design the potential for a significant geologic hazard. On and off-site sewer line improvements would be constructed in accordance with the Uniform Building Code to withstand a maximum credible earthquake. Potentially significant impacts would be mitigated to below a level of significance through adherence to recommendations contained in site-specific Geotechnical Investigation Reports.

Due to the presence of steep topography and topsoils with high erosion potential onsite, as well as the proximity of larger drainage courses, the proposed Project could potentially result in significant short-term erosion and sedimentation impacts. For the gravity sewer design option, the potential exists for increased off-site erosion due to exposure of soils as trenches are excavated for the placement of sewer lines. Implementation of erosion control measures proposed as part of the Montecito and Sycamore Estates VTMs and adherence to required erosion control and sedimentation prevention plans will mitigate erosion and sediment transport both during and after construction. The erosion control plan will identify both construction and post-construction Best Management Practices (BMPs) to mitigate impacts to below a level of significance.

Hydrology / Water Quality

The *Rancho Encantada* project site is located in the San Diego Hydrologic Region (SDHR), which drains westerly toward the Pacific Ocean and is part of the Peñasquitos Watershed. The project site comprises two percent (2%) of the Peñasquitos Watershed.

The Montecito sub-project site drains in a northerly direction to existing facilities along Beeler Canyon Road. The Montecito project-specific hydrology/drainage analysis calculates storm flow rates for a 100-year storm event. These storm flow rates were used during the analysis to investigate the impact of the proposed project on the six existing watersheds. The net effect of the proposed development would be a total discharge decrease of 81.1 cubic feet per second (cfs) during a 100-year storm event due to the use of on-site detention basins to slow peak flows. During a 100-year storm event, a decrease of 81.1 cfs of stormwater flows would not be considered significant.

The Sycamore Estates sub-project drains into Beeler Canyon Creek adjacent to the north of the site, including surface runoff from the existing industrial development located on the Sycamore Estates property. The Sycamore Estates project-specific hydrology/drainage analysis calculates storm flow rates for a 100-year storm event. These storm flow rates were used during the analysis to investigate the impact of the proposed project on the nine existing watersheds. The net effect of the proposed development would be negligible because the on-site detention basins would maintain post-development peak flows at pre-development levels. A 62-acre drainage area diversion would occur on the Sycamore Estates sub-project site to prevent urban runoff from reaching the southerly trending canyons.

This drainage area diversion is not considered a significant impact because it would not result in significant impacts to existing sensitive biological resources. A potentially significant water quality impact also would occur at the affordable housing site and at the school/park site proposed by the Precise Plan and the Sycamore Estates sub-project because more than 20 parking spaces would be required in these two areas.

No portions of the Precise Plan area are located within a 100-year floodplain as mapped by the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Maps (FIRM). However, as a design option of the proposed Project, a gravity sewer line is proposed. Gravity sewer improvements would occur within the City of Poway, and portions of the improvements would be located in a 100-year floodplain. The construction of the proposed underground improvements would conform to the National Flood Insurance requirements and local ordinance. The improvements would not increase flood levels or impair the ability of the floodway to carry and discharge the waters resulting from the one-hundred-year flood; thus impacts would not be significant.

Development of the *Rancho Encantada* project site as proposed would result in an increase in the amounts of urban pollutants over existing conditions. Short-term water quality impacts to the drainage basin would be expected during the grading and construction phases of the proposed Project when cleared and graded areas would be exposed to rain and surface runoff. Improperly controlled runoff would result in erosion and transport of the sediment to the basin. The long-term water quality impact potential would be related to contaminated urban runoff caused by the introduction of urban uses and impervious surface areas to the site. These pollutants would adversely affect the water quality in Beeler Canyon Creek and would increase the amount and concentration of urban pollutants entering the drainage basin. As required under the City's NPDES Permit, dischargers are required to develop and implement Best Management Practices (BMPs) to control the discharge of pollutants. BMPs appropriate to the characteristics of the Project would be employed to reduce pollutants available for transport or to reduce the amount of pollutants in runoff prior to discharge to a surface water body. The sub-project applicants would be required to secure the necessary NPDES permits and implement the appropriate BMPs for construction activities and structural improvements to reduce direct impacts to below a level of significance. Significant direct impacts would be mitigated to below a level of significance. Cumulatively significant impacts would remain unmitigable.

Transportation

The Project's access opportunities based on the existing street network are from the north via existing Beeler Canyon Road/Creek Road and from the west on Pomerado Road just north of Spring Canyon Road. Rancho Encantada Parkway is proposed to be constructed on-site to provide access to Pomerado Road. Rancho Encantada Parkway would be built along the southern portion of the project site, forming a "T" intersection south of Legacy Point on Pomerado Road. Given the layout of the site and the local/regional orientation of Project traffic, the traffic study indicates that the bulk of the project trips would load from the west via this new roadway. Beeler Canyon Road access to the north would remain with limited Project access. The Project would generate approximately 10,548 ADT.

To determine the Project's traffic distribution on the surrounding transportation network, a regional traffic model was developed to reflect this Project and its proposed access. Based on this model, the addition of Project traffic to Pomerado Road is regarded as a significant direct and cumulative unmitigable impact. Cumulatively significant impacts would also occur at the following facilities, and would require mitigation: a) the westbound to southbound freeway on-ramp at Pomerado Road/I-15; b) the merging distance on Pomerado Road to the east of the I-15 northbound off-ramp; c) off-ramp storage at the Pomerado Road/I-15 northbound off-ramp; d) the intersection of Pomerado Road/Scripps Poway Parkway ~~Intersection~~; and e) three Pomerado Road intersections: Scripps Poway Parkway, Willow Creek, and Scripps Ranch Boulevard. Mitigation measures specified in Section 4.6 of this EIR would reduce these cumulative impacts to below a level of significance, except for the addition of traffic to Pomerado Road which is unmitigable.

Noise

Traffic noise, except along the western property boundary of the Montecito sub-project site, very close to Pomerado Road, is not perceptible on the site, particularly because variable terrain shields the site interior from exterior noise sources. Due to the proximity of the project site to the Marine Corps Air Station (MCAS) Miramar runway, aircraft noise is audible. The MCAS Miramar 60 dB CNEL contour is well within the MCAS property, and is not within the *Rancho Encantada* project boundaries.

Three noise concerns are typically identified with land use development such as that proposed for the project area: 1) construction activities, especially heavy equipment, which could create short-term noise increases near the project site; 2) the increase in project-related traffic which could cause an incremental increase in area-wide noise levels; and 3) elevated future ambient levels from adjacent arterial roadways that could place possible constraints on siting noise-sensitive uses on the project site.

Construction noise impacts would be temporary in nature and less than significant. The project would be required to comply with the City's Noise Ordinance which states that all construction and general maintenance activities, except in an emergency, shall be limited to the hours of 7 a.m. to 7 p.m. Monday through Saturday. This requirement would be included as a condition of all grading and construction permits for the City of San Diego's and the City of Poway's Noise Ordinance. Section 59.5.0404 of the City of San Diego's Municipal Code and Chapter 8.08.100 of the City of Poway's Municipal Code also contain performance standards that limit the allowable noise from construction at the property line of any adjacent residential use. Short-term construction noise impacts also would occur off-site along a proposed sewer line alignment, if the gravity sewer design option is implemented. Construction of the off-site gravity sewer line would be required to comply with the City of Poway's noise ordinance.

Long term noise concerns from the increased urbanization of the project area center primarily on mobile source emissions surrounding the project site. Maximum Project-related impacts would be 2 dB along any roadway segment analyzed. These increases would occur along roadways closest to the project site (Pomerado or Spring Canyon Roads). Farther from the site, as Project traffic becomes progressively diluted, noise increases are 0-1 dB. None of the Project-related noise increases equal or exceed the +3 dB CNEL increase considered an individually potentially significant noise impact. Vehicular noise along Pomerado Road has the potential to impact homes on the Montecito sub-project site if private yards of the homes were located within 100 feet of the roadway centerline. Because no

residential lots are proposed by the Montecito PRD within 100 feet of the roadway centerline, impacts would not be regarded as significant.

Significant interior noise impacts would potentially occur to homes located within 200 feet of the Pomeardo Road centerline. Significant interior and exterior noise impacts also would potentially occur to residential lots proposed within 80 feet of the Rancho Encantada Parkway centerline on Montecito. Significant interior and exterior noise impacts would potentially occur to residential lots in Planning Areas 7, 7A and 9 (west of the school park site). Prior to the issuance of building permits for affected areas, a subsequent acoustical analysis shall be prepared to identify all noise control requirements on building and site plans necessary to meet City of San Diego interior standard of 45 dB CNEL and exterior standard of 65 CNEL. Noise attenuation walls also will be constructed along Rancho Encantada Parkway in the locations specified by the Project's acoustical analysis. These measures would reduce impacts to below a level of significance.

Air Quality

The San Diego area climate is characterized by a repetitive pattern of frequent morning cloudiness, hazy afternoon sunshine, clean daytime onshore breezes and little temperature change throughout the year. Limited rainfall occurs in winter while summers are often completely dry. The atmospheric conditions limit the ability of the atmosphere to disperse the air pollution generated by the large population. High smog levels in coastal communities occasionally occur when polluted air from the South Coast (Los Angeles) Air Basin drifts seaward and southward at night and then blows onshore the next day. Such interbasin transport would cause occasionally unhealthy air over much of San Diego County despite the best air pollution control efforts.

For purposes of a worst-case analysis, five percent of the entire 2,657-acre Precise Plan area, or 133 acres, was assumed to be disturbed on a maximum grading activity day. Simultaneous disturbance of the 133 acres would generate daily total PM-10 emissions of approximately 7,300 pounds if no mitigation measures are implemented. Implementation of vigorous dust control measures would reduce PM-10 associated with grading by 50-75 percent or in the range of 1,800-3,600 pounds per day. The non-attainment status of the air basin for PM-10 requires that all reasonably feasible dust control measures be utilized. Even if an aggressive dust control program is implemented during construction, the substantial daily PM-10 emissions may potentially create violations of PM-10 standards both near the project site, as well as on a regional scale which is regarded as a potentially short-term cumulative impact. Construction activity also would occur off-site along a proposed sewer line alignment, if the gravity sewer design option is implemented.

The proposed Project would not result in long-term significant direct impacts to air quality associated with vehicular trips or stationary sources. The Project's contribution to the San Diego region's current inability to meet air quality standards would, however, be considered a cumulatively significant and unmitigable impact. While regional mobile source emissions associated with the proposed Project would not have a significant long-term impact on local San Diego air quality, the addition of Project related traffic in the area may change microscale air quality distributions. To determine whether future traffic changes would create an adverse air quality impact, a microscale air quality analysis was performed for the traffic analysis grid near the project site. The analysis concluded that localized CO

levels would not exceed 14 ppm at any of the studied intersections. Microscale air quality impacts ("hot spots") are therefore considered less than significant.

A sewer lift station is proposed as an off-site improvement of the Sycamore Estates sub-project and would be located in the northwestern portion of the Montecito sub-project site on one acre. Odor detectability would be confined to the immediate vicinity of the lift station. Any potentially adverse impacts would be confined only to workers servicing the lift station; thus direct impacts would not be considered significant.

Cultural Resources

Record searches from the Museum of Man and the South Coastal Information Center of San Diego State University indicate that previously recorded resources are located within the *Rancho Encantada* project area. Based on the Montecito sub-project records research, there were two recorded isolated flakes (SDI-I-788 and SDI-I-789), but they were not relocated during the survey conducted by BFSa. As a result of the 20 shovel tests, one artifact was recovered, without the presence of any other cultural or ecofactual materials. Based on the negative results of the surveys, it is concluded that no cultural resources are located within the boundaries of the Montecito property. No impacts to cultural resources would occur on the Montecito sub-project site. If the gravity sewer option is selected for implementation, no cultural resources impacts would occur based on the record search/field study conducted by Kyle Consulting.

Eight sites and three isolates were identified by previous studies in the Sycamore Estates sub-project area, and two additional sites and eleven isolates were identified during the cultural resources survey. These sites primarily contain large habitation sites, prehistoric campsites, prehistoric lithic scatter/quarry locations, bedrock milling sites and historic structures and trash scatters. Significance testing was conducted, which concluded that one of the sites is considered potentially significant, and mitigation is required. Site CA-SDI-14027H located within the Sycamore Estates sub-project area is identified as potentially significant, but could not be accessed. As mitigation, a qualified archeologist and/or archeological monitor shall be retained to implement a construction monitoring program to mitigate impacts to below a level of significance.

Paleontological Resources

Three geologic formations were mapped by in the *Rancho Encantada* project site area: Eocene-aged Stadium Conglomerate, Pomerado Conglomerate and Cretaceous-age igneous granitic rock of the Southern California Batholith. The Montecito sub-project site is entirely underlain by Stadium Conglomerate, and all three geologic formations underlie the Sycamore Estates sub-project site.

According to the report *Paleontological Resources: County of San Diego (1994)*, the Stadium Conglomerate Formation (Cypress Canyon Member) has produced diverse and well preserved remains of terrestrial vertebrates and is assigned a high paleontological resource sensitivity. Implementation of the Project would have the potential for significant impacts to paleontological resources in areas proposed for grading. Paleontological monitoring during grading would be required to mitigate direct impacts to below a level of significance. Cumulative impacts are considered significant and

unmitigable. If the gravity sewer design option is implemented, off-site paleontological impacts could occur during trenching operations, which would be regarded as a potentially significant impact and mitigation would be required according to City of Poway requirements.

Public Services

Fire Services: The *Rancho Encantada* project area is located within the service area of the City of San Diego Fire Department. To provide adequate fire protection to the community, the Fire Department strives to provide a six-minute response time to areas in need of service and a 10-minute response time for paramedic ambulances throughout the City. There are five fire stations located within the vicinity of the project site. Fire Station 37, with construction commenced at Spring Canyon Road and Blue Cypress Drive, is tentatively scheduled to be in service by approximately April 1, 2001. Response time from Fire Station 37 to the western boundary of the project site is expected to be under two minutes. Fire Station 37 will accommodate Engine Company 37, temporarily located at 10750 Scripps Lake Drive and has a 6.3 minute response time to the project site. Fire Station No. 51 is located at 13050 Community Road in the City of Poway, and is currently the primary fire station serving the project area with a 5.4-minute response time to the western boundary of the project site via Pomerado Road. Existing response times are slightly longer to reach the Sycamore Estates portion of *Rancho Encantada*, as the sub-project site's access is Beeler Canyon Road rather than Pomerado Road. Response times to the easternmost portions of the Sycamore Estates sub-project site may exceed the Fire Department's six minute response time goal, resulting in a potentially significant fire protection impact. This impact would be mitigated to below a level of significance through the preparation of a fire response time analysis. If a structure would occur outside of the 6-minute response time, a fire sprinkler system would be installed in the structure. Additionally, with implementation of the proposed brush management plans, fire protection impacts associated with wildfire hazard would be reduced to below a level of significance.

Police Protection: The project area is located within the San Diego Police Department's Northeastern Command Area located in the Rancho Peñasquitos community at 13396 Salmon River Road. The project site is located within Beat 241 of the Scripps Mesa Service Area. The Police Facilities Plan establishes a seven-minute average response time as a Department goal. The average response time for an emergency call to the project site from the Northeastern Command Area is 9.4 minutes. The adequacy of police service is a factor of community-wide importance that cannot be resolved on a project-specific basis. Because development of the proposed project would not cause the response times for police services to increase, impacts would not be regarded as significant.

Library Facilities: The City of San Diego library system is comprised of a central library located in downtown San Diego and a series of branch libraries throughout the City. Planning for new branch libraries is based on a standard of serving 18,000-20,000 residents at the time of construction and 30,000 residents within 20 years after the branch opens. The *Rancho Encantada* community would be served by the Scripps Ranch Library that is located at 10301 Scripps Lake Drive in the City of San Diego. Although development of the project would incrementally increase the demand for library services, this incremental demand would not be a significant impact.

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Schools: A school-age population would be generated by development in *Rancho Encantada*, creating a demand for public education services and facilities. The project would generate approximately 831 students, with 255 students generated by the Montecito sub-project and 576 students generated by the Sycamore Estates sub-project. The conveyance of an on-site elementary school site to the Poway Unified School District would reduce the Project's impact to elementary school capacity to below a level of significance. Significant cumulative impacts to Rancho Bernardo or Poway High School and Meadowbrook Middle School would occur due to overcrowding. If the Sycamore Estates sub-project is not developed, cumulative impacts generated by the Montecito sub-project on elementary school capacity would be regarded as significant. Each sub-project shall be required to pay statutory SB-50 fees in place at the time of building permit issuance to reduce cumulative impacts to below a level of significance.

Parks: The proposed Precise Plan would generate the need for 8.05 acres of active park land, with 2.46 acres attributable to the Montecito sub-project and 5.59 acres attributable to the Sycamore Estates sub-project. A 4.0 acre public park is proposed on the Sycamore Estates sub-project site adjacent to the school. If the park is not located next to the school, then an 8.05-acre park site will be conveyed on-site. If the Montecito sub-project site is developed before the Sycamore Estates sub-project site, the owner/permittee shall pay into the Rancho Encantada PFFP prior to the issuance of building permits. This would reduce impacts to public parks to below a level of significance.

Solid Waste: The City of San Diego Environmental Services Department (ESD) is responsible for solid waste disposal in the project area. To achieve the State's mandated waste reduction, the ESD has implemented comprehensive recycling, hazardous materials management, code enforcement, and support programs. The *Rancho Encantada* project would generate approximately 2,173 tons of solid waste a year. Landfill capacity would be available to serve the proposed Project, and recycling would be incorporated in development plans in accordance with the requirements of the Integrated Waste Management Act and the City of San Diego. The proposed Project's incremental impact to landfill capacity is not considered significant on a project-specific level. Cumulative impacts on solid waste services would be regarded as significant and unmitigable.

Water Service: The project vicinity is supplied with water by the City of San Diego. The Precise Plan area is located adjacent to the City of San Diego's Scripps-Miramar Ranch Water Service Area. The Montecito sub-project would have an average annual water demand of 52.9 million gallons and the Sycamore Estates sub-project would have an annual average water demand of approximately 422 million gallons. A water storage reservoir and two water pump stations would be constructed on Sycamore Estates. Adequate water service would be available to the project site; thus, impacts are not regarded as significant.

Sewer Service: The Metropolitan Sewer System (METRO) which is owned by the City of San Diego, provides sanitary sewer service to the project vicinity. On February 2, 1981, the City of San Diego and the City of Poway entered into an agreement known as the "*Pomerado Relief Trunk Sewer Agreement of 1980 between the City of San Diego and the Pomerado County Water District*" regarding the Scripps Miramar Ranch sewer line. In 1989, a second amendment to that agreement was approved which addresses sewage originating in the City of San Diego discharging through sewer mains in the City of Poway and traveling back into the City of San Diego to the METRO system. Under Section 6 of this

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agreement, it was acknowledged that the "Beeler Canyon" area would be developed in the future and that its sewer would be incorporated into the Scripps Miramar Ranch sewer. The Montecito sub-project would generate approximately 28.3 million gallons of sewage flow annually. The Sycamore Estates sub-project would generate approximately 89 million gallons annually. Two design options are proposed: either the construction of a sewer lift station or off-site gravity sewer improvements in the City of Poway. Adequate sewer service would be available to the project site; thus, impacts are not regarded as significant.

Public Safety

The San Diego Gas & Electric Company (SDG&E) maintains several electrical transmission line easements on the project site. There has recently been concern about electromagnetic fields (EMF) and adverse health effects. Future residents of the proposed Project would be exposed to EMF from power lines within existing SDG&E easements. Due to the inconclusive nature of scientific data regarding the hazards of EMF, potential impacts are speculative in nature and are not regarded as significant. No hazardous materials are located on the Montecito sub-project site. Five existing industrial use areas are located on the Sycamore Estates sub-project site, some components of which are considered potentially hazardous. Significant impacts would be reduced to below a level of significance through reclamation. Additionally, significant hazard potential exists at Cultural Resource Site CA-SDI-15159H, the site of a WWII era training airplane crash, where there is a remote possibility that some casings may still have functional primers. This site would be flagged in the field prior to grading and the topsoils would be examined. If ammunition is found, it would be disposed of by either MCAS Miramar and/or San Diego bomb disposal squad. Removal of the ammunition, if found, would mitigate this potential impact to below a level of significance.

Water Conservation

Implementation of the proposed Project would increase water demand within the project site by approximately 0.58 million gallons per day (MGD). Additionally, short-term water consumption would occur during the construction phases of Project development. Implementation of the proposed *Rancho Encantada* Precise Plan's Design Guidelines would reduce, but not fully mitigate, significant cumulative water conservation impacts. Direct impacts would be mitigated to below a level of significance.

Natural Resources

The Conservation Element identifies the project site as containing Poway Conglomerate which is described as a local source of sand, gravel, road base material and aggregate for asphaltic concrete. The *Rancho Encantada* Precise Plan area represents approximately two percent of the Western San Diego County P-C Region's resources mapped 11,000 million tons of aggregate resources. Taking into consideration local government constraints, however, the sub-projects would represent a larger percentage of the actual available resources. Implementation of the proposed Project would preclude future mining of the site. Although only a small amount of area would be removed from potential mining of aggregate material, this preclusion is regarded as a significant cumulative and unmitigable impact.

The *Rancho Encantada* project site is not currently being used for agricultural uses, nor has it been farmed in the past. The steeply sloping natural topography of the site also is not conducive for planting of agricultural field crops. Implementation of the proposed Project would therefore not impair or convert existing agricultural land to non-agricultural use. Using the U.S. Department of Agriculture Soil Survey, it was determined the vast majority of soils on the project site are not highly suitable for agriculture. Because prime agricultural soils are not located on the project site, impacts to agricultural resources would not occur.

Cumulative Effects

The proposed project would contribute to the cumulative effects associated with the ongoing urbanization in the area. Implementation of *Rancho Encantada* has the potential to result in significant cumulative effects associated with landform/visual quality, loss of non-native grassland (raptor foraging habitat), transportation, hydrology/water quality, air quality, paleontological resources, landfill capacity, public schools, water conservation and mineral resources. With the exception of public schools, these impacts would remain significant and unmitigable.

Cumulative landform/visual quality impacts would occur due to the change in the site's appearance from a largely natural view to that of a residential community surrounded by open space. The loss of non-native grasslands due to the development of the Project would result in cumulatively significant impacts to the white-tailed kite, Cooper's hawk, northern harrier and the black-tailed jackrabbit that forage on the site. Cumulatively significant transportation impacts would occur at the following facilities, and would require mitigation: a) the westbound to southbound freeway on-ramp at Pomerado Road/I-15; b) the merging distance on Pomerado Road to the east of the I-15 northbound off-ramp; c) off-ramp storage at the Pomerado Road/I-15 northbound off-ramp; d) the intersection of Pomerado Road/Scripps Poway Parkway Intersection; and e) three Pomerado Road intersections: Scripps Poway Parkway, Willow Creek, and Scripps Ranch Boulevard. Cumulative impacts to Pomerado Road would remain significant and unmitigable.

Due to the non-attainment status of the San Diego Air Basin, all development projects in the Basin are considered to have a significant cumulative air quality impact. The San Diego Regional Water Quality Control Board (RWQCB) has designated the Los Peñasquitos Lagoon as a 303D impaired water body. Implementation of the proposed *Rancho Encantada* project, when considered in conjunction with other proposed developments and existing urban development within its watershed, would impact the water quality of the lagoon. The Project would implement pre- and post-construction BMPs, but no measures are currently available to fully mitigate cumulative impacts on the water quality of Los Peñasquitos Lagoon.

Cumulative mineral resources impacts would occur due to the preclusion of future mining potential of the property. Mitigation is not available for this cumulative impact, because the impacts would occur due to entitlement and development of the property.

Effects Found Not to be Significant

The proposed *Rancho Encantada* project would not have the potential to cause adverse effects associated with the following issue areas, and these areas have not been addressed in this EIR: Risk of Upset, Population and Housing, Energy, and Light and Glare.

CEQA Summary Sections

The project would have significant environmental effects on many different areas of the environment, as discussed in this EIR. With the exception of direct land use (Industrial Element inconsistency), landform alteration/visual quality impacts, and transportation (direct impacts to Pomerado Road) and cumulative landform alteration/visual quality, biological resources (loss of non-native grassland habitat), transportation (Pomerado Road), landfill capacity, water conservation, water quality, air quality, paleontological resources and mineral resources impacts, all significant environmental effects of the Project would be mitigated to below a level of significance.

Growth Inducing Effects

Infrastructure, public services and utilities are planned to serve the project site. The proposed *Rancho Encantada* project site is consistent with the purpose and intent of Council Policy 600-29 by clustering development on select portions of the project site, thereby preserving a majority of the property (approximately 80 percent) as natural open space. Because appropriate infrastructure, public services and utilities are planned to serve the site; because appropriate and proximate circulation improvements are planned; and because the project adjoins planned development to the north and west and is bound by permanent open space to the east and MCAS Miramar to the south, implementation of the Project would not be growth inducing. The proposed Project has, however, been required by the City of San Diego to design its sewer system pipeline sizes to accommodate future residential development on MCAS Miramar and to provide a sewer easement to the Project's south property boundary. In this manner, the Project would have the potential to induce military housing development on MCAS Miramar.

Project Alternatives

No Project - Existing Zoning Alternative: This alternative focuses on potential development of the site which could occur in accordance with the property's underlying zoning, taking into consideration existing utility easements and other land use regulations. The Montecito sub-project site is zoned R-1-8 (formerly R1-40,000 under the CMC), and 277 units would be developed in the southern portion of the sub-project site. The Sycamore Estates sub-project site is zoned AR-1-1, IL-3-1 and IH-2-1 (formerly A-1-5, M-1A and M-2A). Approximately 870 acres of the Sycamore Estates site are zoned AR-1-1 (formerly A-1-5), thus, a maximum of 174 residential units would be developed, clustered within the western and northern portions of the sub-project site. IL-3-1 and IH-2-1 are industrial classifications, and approximately 222 acres of the sub-project site would be developed with manufacturing/ industrial uses. Industrial areas would be graded to include large, flat pads necessary to accommodate large buildings and parking areas. *Rancho Encantada Parkway* would be constructed in the southern portion of the project site, and *Street B* would connect to *Beeler Canyon Road*. Including all necessary

manufactured slopes necessary to create development pads, approximately 92 acres of the Montecito sub-project site and 529 acres of the Sycamore Estates sub-project site would be graded or disturbed. Compared to the proposed Project, the No Project – Existing Zoning Alternative would decrease the severity of impacts associated with landform alteration, erosion, biology, air quality, paleontological resources, and public services and increase the severity of impacts associated with visual quality, water quality, traffic and noise. The Project's direct land use impact due to inconsistency with the Industrial Element of the General Plan would be avoided by this alternative.

No Project - Resource Extraction Alternative: This Alternative considers development of the Montecito sub-project site with 277 residential units as described above under "No Project – Existing Zoning Alternative," while allowing for an aggregate mining operation on the Sycamore Estates sub-project site. The mining operation would encompass 847.5 acres and would consist of one large quarry, process plant operations, and an asphalt or concrete batch plant, as well as office and maintenance buildings. It is assumed that mining, material processing and batching activities would disturb approximately 250 acres at any given time, over a period of approximately 75 years. The proposed Project's direct land use impact and cumulative natural resource impact caused by precluding future use of the site for resource extraction would be avoided by the selection of this Alternative. Impacts associated with public services, traffic, and water conservation would be less under this Alternative. Impacts to cultural resources would be the same as would occur under the proposed Project. Compared to the proposed Project, the No Project – Resource Extraction Alternative would increase impacts associated with landform alteration/visual quality, erosion, water quality, biology, noise, air quality, paleontological resources, and public safety. Direct impacts to hydrology/water quality, biology, noise, paleontological resources and public safety would be mitigable. Cumulative landform alteration/visual quality, loss of non-native grassland (raptor foraging habitat), air quality, water quality, and paleontological resources would remain significant and unmitigable.

Reduced Project Alternative: This Alternative considers reducing the development footprint of the proposed Project. The Montecito sub-project site would be developed with the same number of residential units as proposed by the Project, but would impact less of the site by clustering development into one smaller, more compact planning area located adjacent to Pomerado Road. In total, 277 units would be constructed on a development pad of approximately 50.9 graded acres. The Sycamore Estates sub-project site would be rezoned to AR-1-1 (formerly A-1-10 under the City's pre-2000 Municipal Code) and 481 residential units would be constructed on the site, including 404 single-family units and 77 affordable housing units. A 16-acre school/park site would occur, and access would be provided via a loop road, with two main access points on Beeler Canyon Road. Approximately 349.8 acres of the sub-project site would be graded under this Alternative.

Compared to the proposed Project, the Reduced Project Alternative would decrease direct impacts associated with landform alteration/visual quality, erosion, hydrology/water quality, biology, traffic, noise, air quality, paleontological resources, public services and water conservation. Under this alternative, a wider wildlife corridor would occur in Beeler Canyon. Public safety and natural resources impacts would be the same as would occur under the proposed Project and cultural resource impacts would be avoided. Potentially significant off-site traffic and noise impacts would occur along Beeler Canyon Road, which would not occur under the proposed Project. Fire protection impacts would increase because homes on the Sycamore Estates sub-project site would not be within a six-minute

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response time; this impact would be mitigable with the installation of fire sprinklers in each residence. Recreational resources impacts would be adverse for Montecito, because the park on Sycamore Estates could not be accessed within ½-mile driving distance. This Alternative would provide less housing (both single-family and multi-family affordable) than the proposed Project. However, it would provide more overall open space. In conclusion, several impact reductions would occur with implementation of this Alternative. Impacts to public safety and natural resources would be the same as under the proposed Project. Impacts to cultural resources would be avoided. Impacts to cumulative air quality and water quality, although reduced, would remain significant and unmitigable. Off-site traffic and noise impacts along Beeler Canyon Road, fire protection impacts and impacts to recreational resources would be greater with this Alternative as compared to the proposed Project. This Alternative would provide more overall open space. Because the Reduced Project Alternative would more fully achieve the goal of locating development on the least environmentally sensitive portions of the site, and because it would have the fewest overall impacts, this Alternative is identified as the Environmentally Superior Alternative.

Reduced Grading Alternative: Under this Alternative, the Montecito and Sycamore Estates sub-project sites would be developed with large, custom home sites. Rural, private roadways and driveways would occur internal to the project site to provide access to the lots. For purposes of this Alternative, it is assumed that access points would be established with Beeler Canyon Road and one with Pomerado Road. A total of 114 lots would occur on the Montecito sub-project site and 429 lots would occur on the Sycamore Estates sub-project site. It is assumed that up to 50 percent of each lot would be disturbed by grading and construction of the custom homes, and associated private yards and driveways. The owner of each lot would be responsible for selecting the location for placement of the building footprint. In many cases, homes would likely be sited on the flattest portion of the lot, or would be built into the hillside. Compared to the proposed Project, the Reduced Grading Alternative would avoid landform alteration impacts and decrease significant impacts associated with biology, visual quality, erosion, water quality, traffic, noise, air quality, paleontological resources and water conservation. Public safety and natural resources, and cultural resources impacts would be the same as would occur under the proposed Project impacts would be avoided. Although direct impacts to biological habitats would be reduced, indirect but mitigable impacts may be increased, because of increased proximity of the open space to domestic animals and humans. Cumulative impacts also would be reduced as discussed previously. Fire protection impacts would be mitigatable, but may be increased due to the circuitous network of private driveways on the site.

RPO Consistent Alternative: The proposed Project is consistent with the provisions of RPO for hillside and biological resource encroachment on a project-wide basis. Considering each of the sub-projects separately, Montecito would exceed its hillside encroachment allowance. In addition, the proposed Project would impact 0.01-acre of natural flood channel on the Montecito sub-project site and 0.53-acre of natural flood channel on the Sycamore Estates sub-project site. In addition, 0.02-acre of natural flood channel would be impacted by the sewer pump station design option. Wetland impacts are not permitted by RPO. Thus, the purpose of this Alternative is to comply with RPO through avoiding impacts to wetlands and to reduce the development footprint of Montecito to below its individual hillside encroachment allowance. The site would be developed similar to that of the proposed Project, but the graded area would be reduced to 92 acres on the Montecito sub-project site and to 440 acres on the Sycamore Estates sub-project site. A total of 144 residential units would occur

on the Montecito sub-project site and 462 residential units would occur on the Sycamore Estates sub-project site, including 52 affordable units. The affordable housing site, school and park site would occur in the same manner as proposed by the Project. Rancho Encantada Parkway would traverse the southern portion of the site, but would be bridged in one locations, spanning a length of 450 feet. The sewer pump station's access road also would be bridged to avoid impacts to wetlands. Compared to the proposed Project, the RPO Consistent Alternative would avoid impacts to wetlands. Due to a reduction in graded area and the construction of a fewer number of residential units, impacts to landform alteration/visual quality, biological resources, hydrology/water quality, traffic, noise, air quality, paleontological resources, public services and water conservation would be reduced as compared to the proposed Project; however, all impact significance and mitigation conclusions would remain the same. Impacts to natural resources would be the same as the proposed Project and cultural resource impacts would be avoided. This Alternative would partially meet the goals of the proposed Project. However, 335 fewer residential units would be achieved than the proposed Project.

Table ES-1
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(refer to Table ES-2 for a summary of the off-site gravity sewer line in the City of Poway)

Environmental Issue	Environmental Impacts	Mitigation Measures	Unavoidable Adverse Impacts
4.1 Land Use			
Progress Guide and General Plan Consistency	<p>The proposed <i>Rancho Encantada</i> project would implement a majority of the environmental goals, objectives and recommendations of the Progress Guide and General Plan. The Sycamore Estates sub-project would be inconsistent with the Industrial Element due to cumulative natural resources (aggregate) impacts associated with Sycamore Estates' proposed rezone from AR-1-1, IL-3-1 and IH-2-1 to AR-1-1.</p> <p>Direct and cumulative impacts associated with landform alteration/visual quality and transportation, and cumulative impacts associated with biology (loss of non-native grassland habitat) hydrology/water quality, air quality, paleontological resources, landfill capacity, water conservation and aggregate resources would be significant and unmitigable and inconsistent with the Progress Guide and General Plan policies.</p>	<p>Mitigation is not available. The impact can be avoided with selection of the Mineral Resource Extraction Alternative.</p> <p>Refer to mitigation measures contained in Sections 4.2, 4.3, 4.5, 4.6, 4.11 and 4.13.</p>	<p>Yes - Sycamore Estates Sub-Project (Inconsistency with the Industrial Element due to Rezone)</p> <p>Yes</p>
Compatibility with Surrounding Land Uses	No land use compatibility impacts are anticipated to occur at the project edges because the development areas would be separated from adjacent land uses by large expanses of open space and elevation differences.	No mitigation is required.	No

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Environmental Issue	Environmental Impacts	Mitigation Measures	Unavoidable Adverse Impacts
Council Policy 600-40 & RPO Consistency	The Project would meet the RPO encroachment allowance for hillside and sensitive biological resources impacts but would be inconsistent with RPO due to wetland impacts. The Project would comply with Council Policy 600-40.	Mitigation for wetland impacts is provided under Section 4.3, BIOLOGICAL RESOURCES. Inconsistency with the RPO wetland encroachment provisions can be avoided with implementation of the RPO Consistent Alternative discussed in Section 9.0 of this EIR.	No
Council Policy 600-29 & Proposition A Consistency	The proposed Project is consistent with the land use intensities allowed under Council Policy 600-29.	No mitigation is required.	No
Multiple Species Conservation Plan Consistency	An MHPA boundary adjustment is proposed that would increase its size by 348.3 net acres. The boundary adjustment is considered a Project benefit by providing increased MHPA area and greater habitat value. The Project would be consistent with the MHPA Adjacency Guidelines, with the inclusion of mitigation measures contained in the EIR to bring the Project into conformance with the lighting, noise, barriers, invasives and drainage and toxics guidelines.	Implementation of the mitigation measures identified in Sections 4.3, 4.5, and 4.7 of this EIR would reduce all potential land use impacts associated with the MHPA Land Use Adjacency Guidelines to below a level of significance.	No
4.2 Landform Alteration & Visual Quality			
Landform Alteration and Topography	Landform alteration impacts would be direct and cumulatively significant because the Project would result in the creation of manufactured slopes higher than ten feet and would result in a change in elevation of steep natural slopes (25 percent gradient or steeper) from existing grade to proposed grade of more than five feet. In addition, grading quantities would exceed 2,000 cubic yards per graded acre.	Exterior manufactured slopes would be contour graded.	Yes - Direct and Cumulative

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Environmental Issue	Environmental Impacts	Mitigation Measures	Unavoidable Adverse Impacts
Visual Quality	The visual appearance of the site would change from a primarily undeveloped area with canyons and ridgelines to that of a developed residential community consisting of 12 gently sloping planning areas surrounded by natural and revegetated slopes. The Project would not block public views; however, it would have significant direct and cumulative visual impacts because development would appear monotonous and the appearance of the site would change from that of a largely natural view to a view of development.	Only adoption of the Reduced Grading, Reduced Project, or RPO Consistent Alternative would partially reduce the visual quality impacts of the proposed Project.	Yes - Direct and Cumulative
4.3 Biological Resources			
Vegetation Community Impacts	<p><u>Montecito</u>: Direct impacts to 0.01-acre of natural flood channel, 39.4 acres of Tier II habitat, 108.5 acres of Tier IIIA habitat and 2.7 acres of Tier IIIB habitat would be regarded as a significant direct impact of the Montecito sub-project.</p> <p><u>Sycamore Estates</u>: Impacts to 0.53 acres of natural flood channel, 4.4 acres of Tier I habitat, 144.7 acres of Tier II habitat, 363.6 acres of Tier IIIA habitat, and 4.1 acres of Tier IIIB habitat would be regarded as significant direct impacts of the Sycamore Estates sub-project.</p>	<p>Mitigation for Montecito consists of onsite preservation of 17.5 acres of Tier II habitat, 65.3 acres of Tier IIIA habitat and 5.6 acres of Tier IIIB habitat inside the MHPA. In addition, 5.5 acres of Tier II habitat shall be preserved off-site inside the MHPA. Wetlands would be mitigated through on-site creation. Wetland buffers less than 100-feet would be fenced during construction.</p> <p>Mitigation for Sycamore Estates consists of onsite preservation of 4.4 acres of Tier I habitat, 72.0 acres of Tier II habitat, 252.9 acres of Tier IIIA habitat and 3.8 acres of Tier IIIB habitat. Wetlands would be mitigated through on-site creation. Wetland buffers less than 100-feet would be fenced during construction.</p>	<p>No</p> <p>No</p>

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Environmental Issue	Environmental Impacts	Mitigation Measures	Unavoidable Adverse Impacts
	<p>If the Sycamore Estates sub-project develops prior to the Montecito sub-project, off-site impacts from the construction of Rancho Encantada Parkway on Montecito would be regarded as additional significant impacts of Sycamore Estates; including 13.7 acres of Tier II habitat and 24.1 acres of Tier IIIA habitat.</p> <p><u>Sewer Pump Station:</u> Construction of the sewer pump station option would result in impacts to 0.02-acre of natural flood channel, 0.8-acre of Tier II habitat, 0.1-acre of Tier IIIA habitat and 0.1-acre of Tier IIIB habitat.</p>	<p>If the Sycamore Estates sub-project constructs Rancho Encantada Parkway as an off-site improvement, additional mitigation would consist on onsite preservation of 13.7 acres of Tier II habitat, and 12.05 acres of Tier IIIA habitat.</p> <p>Mitigation would consist of on-site preservation of 0.8 -acre of Tier II habitat, 0.1-acre of Tier IIIA habitat and 0.1-acre of Tier IIIB habitat. Mitigation would be the responsibility of the permitte who obtains the first grading permit in <i>Rancho Encantada</i>.</p>	<p>No</p> <p>No</p>
Sensitive Animal Species	<p>Cumulative impacts to raptor forging habitat (coastal sage scrub and non-native grassland habitats primarily) would occur due to the loss of Diegan coastal sage scrub and non-native grassland habitats. Direct impacts to raptors would occur if occupied nests are found in areas proposed for construction.</p> <p>Impacts would occur to an individual coastal California gnatcatcher outside of the MHPA on Sycamore Estates. Impacts to the coastal California gnatcatcher are considered significant; however, because it is a covered species under the MSCP.</p>	<p>Grading and construction which create adverse effects to active raptor nests, including noise levels above 60 dB(A), shall be restricted to 300 feet from any Cooper’s hawk nesting site; 900 feet from any northern harrier nesting site; and 4,000 feet from any golden eagle nesting site.</p> <p>No clearing of gnatcatcher occupied habitat is allowed within the MHPA during the breeding season (March 1 to August 15). If clearing or grading occurs during the gnatcatcher breeding season, gnatcatcher surveys to determine nesting sites shall be conducted and impacts to nests avoided.</p>	<p>Yes - Cumulative impacts to raptor foraging due to loss of non-native grassland habitat.</p> <p>No</p>

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Environmental Issue	Environmental Impacts	Mitigation Measures	Unavoidable Adverse Impacts
Sensitive Plant Species	On Sycamore Estates, significant indirect impacts may potentially occur to variegated dudleya due to increased use of the area, and to willowy monardella due to sedimentation.	Areas adjacent to the MHPA would require fencing to limit access to the MHPA. No irrigation on the manufactured slopes upslope of the willowy monardella population shall be allowed beyond those areas necessary for brush management, and a desiltation basin shall be constructed. Silt fences shall be installed prior to grading around all construction areas on slopes within the willowy monardella watershed area.	No
Wildlife Movement	Implementation of the <i>Rancho Encantada</i> project would have minimal impacts to wildlife movement. Impacts would not be considered significant.	No mitigation is required.	No
Conservation of Biological Resources	No impacts would occur. The proposed MHPA boundary adjustment would result in a net 348.3-acre increase to the size of the MHPA. If the Montecito sub-project developed independent of the Sycamore Estates sub-project, the MHPA would be reduced by 15.9 acres, resulting in a significant impact.	If the Montecito sub-project developed independent of the Sycamore Estates sub-project, acquisition of 15.9 acres to be added to the MHPA would be required. The acquisition site shall be proposed for inclusion in the MHPA and provide equal or similar functional equivalency to the area removed from the MHPA on the Montecito sub-project site.	No

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Environmental Issue	Environmental Impacts	Mitigation Measures	Unavoidable Adverse Impacts
4.4 Geology/Soils			
Exposure of People to Geologic Hazards	A portion of the Sycamore Estates site is located in Hazard Category 22 (landslide with moderate risk) and Hazard Category 23 (slide prone areas); however, grading is proposed that would either completely remove the debris flow material, or would result in relatively flat areas. Therefore, grading as proposed by the Sycamore Estates VTM would avoid by design the potential for a significant geologic hazard.	The use of conventional grading techniques and adherence to the recommendations contained in the site-specific Geologic Investigation Reports would avoid all potentially adverse impacts, and no additional mitigation measures are required.	No
Soil Erosion	Grading activities would remove the existing vegetative cover, thereby exposing soils to runoff and erosion. Because the disturbance area is greater than one acre in slopes over 25 percent, potential erosion impacts would be significant.	In conformance with the provisions of Public Resources Code § 21081.6, each sub-project owner/permittee shall retain a mitigation monitor acceptable to the ERM to monitor the grading, construction, and installation of runoff control devices and erosion control revegetation of the applicable sub-project site. Prior to the issuance of building permits, mitigation monitor shall submit in writing to the City Engineer verification that the sub-project has complied with the required notes on the grading plan, landscape plan and Storm Water Pollution Prevention Plan (SWPPP) addressing erosion/urban runoff controls related to erosion control. Grading shall be limited to the dry season (typically March 15 to November 15), unless specific measures for wet season grading are approved for the sub-project by the ERM of the City of San Diego's Planning and Development Review Department.	No

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Environmental Issue	Environmental Impacts	Mitigation Measures	Unavoidable Adverse Impacts
4.5 Hydrology/Water Quality			
Drainage Patterns, Absorption Rates and Surface Runoff	No increase in peak discharge flows would occur during a 100-year storm event due to the use of on-site detention basins to slow peak flows.	No mitigation is required.	No
	The Montecito sub-project would not result in significant direct adverse impacts to existing drainage patterns. A 62-acre drainage area diversion would occur on the Sycamore Estates sub-project site to prevent urban runoff from reaching the southerly trending canyons. This drainage area diversion would not be regarded as a significant impact because it would not result in significant impacts to existing sensitive biological resources. Uncontrolled runoff also would not occur. Thus, the proposed Project would not result in significant direct adverse impacts to existing drainage patterns.	No mitigation is required	No
Surface or Ground Water Quality	Implementation of the proposed Project would result in significant short-term water quality impacts associated with siltation from construction and grading, and significant long-term water quality impacts from urban runoff containing contaminants.	A Storm Water Pollution Prevention Plan (SWPPP) and a Monitoring Program Plan shall be developed prior to the issuance of grading permits for each sub-project, and a complete and accurate Notice of Intent (NOI) shall be filed with the SWRCB. In addition, Best Management Practices (BMPs) shall be incorporated into sub-project engineering plans to the satisfaction of the City Engineer.	Yes - Cumulative

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Environmental Issue	Environmental Impacts	Mitigation Measures	Unavoidable Adverse Impacts
4.6 Transportation			
Traffic Impacts on Circulation Networks	The Project would generate approximately 10,548 ADT. The addition of Project traffic to Pomerado Road is regarded as a significant direct and cumulative impact. Cumulatively significant impacts would also occur at the following facilities: a) the westbound to southbound freeway on-ramp at Pomerado Road/I-15; b) the merging distance on Pomerado Road to the east of the I-15 northbound off-ramp; c) off-ramp storage at the Pomerado Road/I-15 northbound off-ramp; and d) three Pomerado Road intersections: Scripps Poway Parkway, Willow Creek, and Scripps Ranch Boulevard.	Prior to recordation of the first final map, the owner/permittee shall assure the construction of 11 transportation improvements listed in Section 4.6, TRANSPORTATION.	Yes - Direct and Cumulative on Pomerado Road
4.7 Noise			
Construction Related Noise Levels	Construction noise impacts would be temporary and less than significant. The Project would be required to comply with the City of San Diego Noise Ordinance which states that all construction and general maintenance activities, except in an emergency, shall be limited to the hours of 7 a.m. to 7 p.m. Monday through Saturday.	No mitigation is required.	No

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Environmental Issue	Environmental Impacts	Mitigation Measures	Unavoidable Adverse Impacts
Future Traffic Related Noise Levels	<p>Significant interior noise impacts would potentially occur to homes located within 200 feet of the Pomerado Road centerline. Significant interior and exterior noise impacts would potentially occur to residential lots proposed within 80 feet of the Rancho Encantada Parkway centerline on Montecito. Significant interior and exterior noise impacts would potentially occur to residential lots in Planning Areas 7, 7A and 9 (west of the school park site) proposed within 80 feet of the Rancho Encantada Parkway centerline on Sycamore Estates.</p> <p>Off-site vehicular noise impacts would not be significant.</p>	<p>Prior to the issuance of building permits for residential units within 200 feet of the Pomerado Road centerline or 80 feet of the Rancho Encantada Parkway centerline (west of the proposed school/park site), a subsequent acoustical analysis shall be prepared to identify all necessary noise control requirements on building and site plans necessary to meet City of San Diego interior standard of 45 dB CNEL and exterior standard of 65 CNEL. Noise attenuation walls also will be constructed along Rancho Encantada Parkway in the locations specified by the Project's acoustical analysis.</p>	No
4.8 Air Quality			
Short-Term Construction Impacts	<p>Short term fugitive dust impacts would be regarded as significant and the Project's contribution to the San Diego region's current inability to meet air quality standards would be considered a cumulatively significant impact.</p>	<p>An accelerated construction dust abatement management program shall be prepared. The dust abatement program shall achieve a minimum of 60% dust abatement. Non-compliance shall result in a cessation of all construction activities.</p>	Yes - Cumulative
Long-Term Vehicular Emission Impacts	<p>The proposed Project would not result in long-term significant direct impacts to air quality associated with vehicular trips or stationary sources. Localized CO levels would not exceed 14 ppm at any of the studied intersections; thus, impacts are regarded as not significant.</p>	<p>Mitigation is not required for direct impacts. Mitigation for cumulative impacts is not possible on a project-level.</p>	Yes - Cumulative

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Environmental Issue	Environmental Impacts	Mitigation Measures	Unavoidable Adverse Impacts
4.9 Cultural Resources			
Prehistoric or Historic Archaeological Sites	CA-SDI-14027H located within the Sycamore Estates sub-project area is identified as potentially significant, but could not be accessed.	A qualified archeologist and/or archeological monitor shall be retained to implement a construction monitoring program. The qualified archeologist and/or archeological monitor shall be on-site during initial grubbing and excavation grading of CA-SDI-14027H. In the event that cultural resources are discovered, the archaeologist shall direct the project engineer to divert or temporarily halt ground disturbance. For important historical resources, a Research Design and Data Recovery Program shall be prepared and carried out to mitigate impacts to below a level of significance.	No
4.10 Paleontological Resources			
Paleontological Resources	Implementation of the Project would have the potential for significant impacts to paleontological resources in areas proposed for grading.	A qualified paleontologist or paleontological monitor shall be on site full-time during the initial cutting of previously undisturbed areas to inspect for well-preserved fossils and shall instruct the City Engineer to divert or halt grading if resources are uncovered. The paleontologist is responsible for preparation of fossils. Prior to the release of a grading bond, a monitoring results report shall be submitted to the Environmental Review Manager (ERM) of the LDR.	Yes - Cumulative

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Environmental Issue	Environmental Impacts	Mitigation Measures	Unavoidable Adverse Impacts
4.11 Public Services			
Fire Protection	The Montecito sub-project site could be reached by emergency fire equipment in less than six minutes; thus, impacts are not regarded as significant. The Sycamore Estates sub-project site may be outside of the six-minute response time goal from existing and planned fire stations, fire protection impacts would be considered significant.	For the Sycamore Estates sub-project site, prior to the issuance of each building permit, a fire response time analysis shall be submitted to the City's Environmental Review Manager for the building permit in question. If the structure is located outside of the six-minute response time, a fire sprinkler system shall be installed in the structure satisfactory to the Environmental Review Manager and the City Fire Marshall.	No
Police Protection	The <i>Rancho Encantada</i> project site is located outside of the seven-minute response time goal for police protection; however, because development of the project site would not increase existing response times, impacts would not be regarded as significant.	No mitigation is required.	No
Libraries	The project would increase the demand for library services. However, existing branch libraries are adequate to service the proposed project's residents.	No mitigation is required.	No
Public Education	The project would add 229 students to either Poway High School or Rancho Bernardo High School and 163 students to the Meadowbrook Middle School that would result in a significant cumulative impact due to overcrowding. If the Sycamore Estates sub-project is not developed, cumulative impacts to elementary school capacity generated by the Montecito sub-project would be regarded as significant.	Each sub-project shall be required to pay statutory SB-50 fees in place at the time of building permit issuance. This measure will also reduce cumulative impacts on elementary school capacity of the Montecito sub-project if the Sycamore Estates sub-project is not developed.	No

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Environmental Issue	Environmental Impacts	Mitigation Measures	Unavoidable Adverse Impacts
Recreational Resources	The provision of a 4.0-acre public park site adjacent to an elementary school site would satisfy the Project's public park requirement; thus, impacts would not be significant. If the Sycamore Estates sub-project is not developed, direct impacts generated by the Montecito sub-project would be regarded as significant.	No mitigation is required. However, if the Sycamore Estates sub-project is not developed, prior to issuance of building permits, the Montecito sub-project applicant shall pay applicable park fees.	No
Landfill Capacity	The project would generate approximately 2,173 tons of waste per year which would contribute to the cumulative impacts on landfill capacity and waste management services.	When possible, the master developer and construction contractors shall use businesses that use recycled materials; construction contractors shall identify the method of transporting materials to either a landfill or reprocessing centers. A plan will be established to educate and inform contractors of the waste management plan's goals of waste reduction and procedures for implementing them.	Yes - Cumulative
Water Service	The Montecito sub-project would have an average annual water demand of 52.9 million gallons and the Sycamore Estates sub-project would have an annual average water demand of approximately 422 million gallons. A water storage reservoir and two water pump stations would be constructed on Sycamore Estates. Adequate water service would be available to the project site; thus, impacts are not regarded as significant.	No mitigation is required.	No

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Environmental Issue	Environmental Impacts	Mitigation Measures	Unavoidable Adverse Impacts
Sewer Service	The Montecito sub-project would generate approximately 28.3 million gallons of sewage flow annually. The Sycamore Estates sub-project would generate approximately 89 million gallons annually. Two design options are proposed: either the construction of a sewer lift station or off-site gravity sewer improvements in the City of Poway. Adequate sewer service would be available to the project site; thus, impacts are not regarded as significant.	No mitigation is required.	No
4.12 Public Safety			
Overhead Transmission Lines	Future residents of the proposed Project would be exposed to EMF from power lines within on-site SDG&E easements. Due to the inconclusive nature of scientific data regarding the hazards of EMF, potential impacts are speculative in nature and are not regarded as significant.	No mitigation is required.	No
Exposure to Hazardous Materials	No hazardous materials were identified on the Montecito sub-project site; therefore, impacts would not occur. Significant hazard potential exists at Site J on the Sycamore Estates sub-project site due to the presence of a diesel fuel tank, six existing buildings and four septic systems.	Upon tenant vacation of site J on the Sycamore Estates sub-project site, the fuel tank and industrial buildings shall be removed. Soil samples from the project site shall also be collected and analyzed.	No
4.13 Water Conservation			
Water Supplies in the San Diego Region	Impacts would not be regarded as a significant direct impact; however, the increase in water usage that would occur with implementation of the proposed Project would contribute to cumulative water conservation impacts in the City of San Diego.	Implementation of the proposed <i>Rancho Encantada</i> Precise Plan's Design Guidelines would reduce significant direct impacts to below a level of significance. No additional mitigation is required.	Yes - Cumulative

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Environmental Issue	Environmental Impacts	Mitigation Measures	Unavoidable Adverse Impacts
4.14 Natural Resources			
Mineral Resources	Implementation of the proposed Project would eliminate the future potential to conduct resource extraction on the project site. This impact is regarded as a significant cumulative impact.	No mitigation is required for the significant direct mineral resource impacts. Cumulative natural resource impacts would be eliminated by selection of the Resource Extraction Alternative (See section 9.0, ALTERNATIVES).	Yes - Cumulative
Agricultural Land	Because no agricultural uses exist on the site and because the site's soils are not highly suited for agricultural use, the preclusion of farming opportunities on this land would not represent a significant impact.	No mitigation is required.	No

Table ES-2
EXECUTIVE SUMMARY TABLE - GRAVITY SEWER DESIGN OPTION (CITY OF POWAY)

Environmental Issue	Environmental Impacts	Mitigation Measures	Unavoidable Adverse Impacts
4.1 Land Use			
Land Use Compatibility	Off-site sewer line improvements in the City of Poway would be located underground; therefore, no land use or community character impacts would occur from the physical construction of these improvements or from their operation. In areas where the sewer line would be located in the FEMA-mapped floodplain of Beeler Canyon Creek, construction shall be in accordance with the National Flood Insurance requirements and City of Poway requirements, including Municipal Code Chapter 16.88, Provisions for Flood Hazard Reduction. Compliance with FEMA and City of Poway requirements would reduce flood hazard impacts on the off-site gravity sewer line to a level less than significant.	No mitigation is required.	No
4.2 Landform Alteration & Visual Quality			
Landform Alteration	The line would be located underground and the ground surface would be restored to its existing condition. As such, no landform alteration impacts would occur.	No mitigation is required.	No
Visual Quality	The line would be located underground and the ground surface would be restored to its existing condition. As such, no visual quality impacts would occur.	No mitigation is required.	No

Executive Summary

Environmental Issue	Environmental Impacts	Mitigation Measures	Unavoidable Adverse Impacts
4.3 Biological Resources			
Vegetation Community Impacts	Implementation of the gravity sewer option would impact 0.08-acre of wetland habitat, 0.3-acre of coast live oak woodland, 0.1-acre of Diegan coastal sage scrub, and 0.1-acre of non-native grassland which are considered sensitive habitats within the City of Poway.	Mitigation shall consist of creation of 0.9 acres of coast live oak woodland and preservation of 0.3 acres of other upland vegetation. Wetlands would be mitigated through creation.	No
Sensitive Plant and Animal Species	No sensitive plant species are located within the alignment.	No mitigation is required.	No
4.4 Geology/Soils			
Soil Erosion	Soils located along the off-site gravity sewer alignment exhibit high erosion potential. Increased erosion would occur due to exposure of soils as trenches are excavated for the placement of sewer lines. The erosion and transport of material would contribute to siltation of downstream drainage courses, which is a significant short-term construction related impact.	Erosion control measures, as defined in the City of Poway's Grading Ordinance (City of Poway Municipal Code, Title 16, Division III) shall be implemented	No
4.5 Hydrology/Water Quality			
Flooding	Portions of the gravity sewer alignment are located in the mapped 100-year floodplain of Beeler Canyon Creek.	The construction of the proposed underground improvements would conform to the National Flood Insurance requirements and local ordinance. The improvements would not increase flood levels or impair the ability of the floodway to carry and discharge the waters resulting from the one-hundred-year flood; thus, impacts would not be significant.	No

Executive Summary

Environmental Issue	Environmental Impacts	Mitigation Measures	Unavoidable Adverse Impacts
Drainage Patterns, Absorption Rates and Surface Runoff	The sewer line would be located underground and the ground surface would be returned to its existing condition after construction; thus, no increased runoff would occur and hydrology would not be affected.	Mitigation is not required.	
Surface or Ground Water Quality	The line would be located underground and the ground surface would be restored to its existing condition. As such, no increase in the amounts of urban pollutants would occur over existing conditions. Significant cumulative short-term water quality impacts to the drainage basin would be expected during the construction phase when the excavated trench would be exposed to rain and surface runoff.	Construction shall adhere to NPDES Permit No. CA 0108758 and a National Pollutant Discharge Elimination System (NPDES) permit shall be obtained from the State Water Quality Control Board pursuant to the City of Poway Municipal Code, Chapter 13.09. Prior to the issuance of a construction permit for the sewer line, the City of Poway shall have on file proof that the applicant has filed a Notice of Intent (NOI) with the State.	Yes - Short Term Cumulative
4.6 Transportation			
Traffic Impacts on Circulation Networks	No long-term traffic would be generated from the gravity sewer line. No impacts would occur.	Mitigation is not required.	No
4.7 Noise			
Construction Related Noise Levels	Short-term construction noise impacts also would occur. Construction would be required to comply with the City of Poway's Noise Ordinance. The City of Poway Municipal Code states that no construction equipment shall be operated so as to cause noise at a level in excess of 75dB for more than eight hours during any twenty-four-hour period when measured at or within residential property lines.	Mitigation is not required.	No

Executive Summary

Environmental Issue	Environmental Impacts	Mitigation Measures	Unavoidable Adverse Impacts
4.8 Air Quality			
Short-Term Construction Impacts	Short term fugitive dust impacts would be regarded as significant and the Project's contribution to the San Diego region's current inability to meet air quality standards would be considered a cumulatively significant impact.	An accelerated construction dust abatement management program shall be prepared. Non-compliance shall result in a cessation of all construction activities.	Yes - Cumulative
4.9 Cultural Resources			
Prehistoric or Historic Archaeological Sites	Because no significant cultural resources are located along the alignment, adverse impacts would not occur.	No mitigation is required.	No
4.10 Paleontological Resources			
Paleontological Resources	Installation of the sewer line would have the potential for significant impacts to paleontological resources in areas proposed for excavation.	A qualified paleontologist or paleontological monitor shall be on site full-time during the initial cutting of previously undisturbed areas to inspect for well-preserved fossils and shall have the authority to divert or halt grading if resources are uncovered.	No
4.11 Public Services			
Sewer Service	Sewage flow increases would be in accordance with the terms of the approved agreement between the City of San Diego and the City of Poway known as the "Pomerado Relief Trunk Sewer Agreement of 1980 between the City of San Diego and the Pomerado County Water District."	Mitigation is not required.	No

Executive Summary

Environmental Issue	Environmental Impacts	Mitigation Measures	Unavoidable Adverse Impacts
4.12 Public Safety			
Public Safety	No public safety impacts would occur from construction or operation of the gravity sewer line.	Mitigation is not required.	No
4.13 Water Conservation			
Water Supplies in the San Diego Region	Operation of the gravity sewer line would not impact water supplies.	Mitigation is not required.	No
4.14 Natural Resources			
Mineral Resources	The sewer line would be located in public right-of-ways or would be located in land zoned residential and unavailable for aggregate mining. Impacts would not occur.	Mitigation is not required.	No
Agricultural Land	The sewer line would be located in public right-of-ways or would be located in land zoned residential and unavailable for agriculture. Impacts would not occur.	Mitigation is not required.	No

1.0 Introduction

1.1 PURPOSE AND LEGAL AUTHORITY

This Environmental Impact Report (EIR) is an informational document intended for use by the City of San Diego as Lead Agency under CEQA, decision makers, Responsible and/or Trustee Agencies, and members of the general public to evaluate the potential environmental effects of the proposed *Rancho Encantada* project. This document has been prepared in accordance with the guidelines for the preparation of EIRs issued by the City of San Diego and complies with all criteria, standards and procedures of the California Environmental Quality Act (CEQA) of 1970 as amended (PRC 21000 *et seq*) and State EIR Guidelines (CAC 15000 *et seq*). Per Section 21067 of CEQA and Sections 15367 and 15050 through 15053 of the State CEQA Guidelines, the City of San Diego is the *Lead Agency* under whose authority this document has been prepared.

1.2 PROJECT BACKGROUND

The *Rancho Encantada* project site is comprised of three land areas, each of which could be independently developed, except for the City of San Diego parcel. The westerly area, Montecito, is 278 acres in size, including an existing single-family residence on a proposed 1.7-acre parcel. The easterly area, Sycamore Estates, is 2,132 acres. The third area is owned by the City of San Diego and is 248 acres in size. The applicants for the Montecito and Sycamore Estates sub-projects submitted individual Planned Residential Development Permit (PRD) applications and Vesting Tentative Map (VTM) applications in 1999. The Montecito PRD and VTM applications were deemed complete on March 30, 1999, and the Sycamore Estates PRD and VTM applications were deemed complete on September 13, 1999.

In response to requests for a comprehensive planning effort by the adjacent Miramar Ranch North and Scripps Miramar Ranch Community Planning Groups and other community members, the City requested that the Montecito and Sycamore Estates applicants work together to prepare a unified plan for development of the 2,658-acre *Rancho Encantada* project site. The applicants agreed to the preparation of a Precise Plan for the entire 2,658-acre area. The Precise Plan was approved for initiation by the Planning Commission on December 2, 1999, and City Council on December 6, 1999. This EIR thus evaluates a unified Precise Plan for the Montecito and Sycamore Estates sub-projects, as well as the 248-acre City of San Diego property.

Also, it is important to note that the PRDs and VTMs proposed for the Montecito and Sycamore Estates sub-projects are being processed by the City independently from one another, and are evaluated by this EIR as independent implementing actions of the proposed Precise Plan. Despite the fact that the Montecito and Sycamore Estates sub-projects are both evaluated in this EIR, these sub-projects of the overall Precise Plan may be implemented independent from one another.

1.3 SCOPE AND CONTENT OF EIR

An Environmental Initial Study was conducted for the *Rancho Encantada* Precise Plan area by the City of San Diego Planning and Development Review Department. Based on a scoping letter dated January 10, 2000, the City of San Diego identified the potential for environmental impacts associated with the following issue areas: land use, landform alteration/visual quality, geology/soils, air quality, hydrology/water quality, biological resources, noise, transportation/circulation, public services/utilities, natural resources, water conservation, historical resources, paleontological resources, human health/public safety, and cumulative effects. A Notice of Preparation (NOP), dated January 10, 2000, was prepared and distributed by the City to all Responsible and Trustee Agencies, as well as other agencies and members of the public who may have an interest in the project.

This EIR includes a description of the existing conditions relevant to each environmental topic and an assessment of any impacts associated with implementation of the Project. For the purposes of this EIR, the term "Project" refers to all of the discretionary actions described in Section 3.0, PROJECT DESCRIPTION, and the term "project site" refers to the entire *Rancho Encantada* Precise Plan area. As part of the proposed Project, two independent sub-projects are proposed and are referred to as "Montecito" and "Sycamore Estates." Each of the sub-projects proposes PRDs, VTMs, and other necessary actions to implement their respective portions of the *Rancho Encantada* Precise Plan, as described in Section 3.0, PROJECT DESCRIPTION, and can be developed independently of the other sub-project.

CEQA Guidelines §15126.2(a) requires that an EIR "*identify and focus on the significant environmental effects*" of a proposed project. "Effects" and "impacts" mean the same under CEQA and are used interchangeably within this EIR. Where the impact analysis demonstrates that a potential effect would or may (without undue speculation) occur and is found to have a substantial or potentially substantial and adverse impact on physical conditions within the area affected by the Project, mitigation measures are provided which would reduce the significant effects. In most cases, the mitigation measures would reduce impacts to below a level of significance. If feasible mitigation measures are not available or do not reduce the significant effect to below a level of significance, the significant effect is identified as one which would result in a significant unavoidable adverse impact.

Cumulative impacts are presented in a separate section addressing issues for which the proposed Project's incremental effects were found to be cumulatively considerable, as defined by CEQA Guidelines §15065(c). A section titled *Effects Found Not to Be Significant* presents a brief discussion of the environmental effects of the Project which were evaluated as part of the initial study process and were found not to be potentially significant. This EIR also includes mandatory CEQA discussion areas as well as a discussion of a reasonable range of project alternatives which could avoid or reduce potentially significant environmental impacts associated with implementation of the Project.

This EIR functions as both a Program and Project-level EIR for the *Rancho Encantada* Precise Plan and related actions, according to §15168 of the State CEQA Guidelines.

The "program" consists of the project approvals detailed in Section 3.0, PROJECT DESCRIPTION, and other related actions necessary to implement the Precise Plan. This EIR also functions as a project-specific EIR for the implementing Montecito and Sycamore Estates sub-projects that are being processed concurrently with the Precise Plan.

Printed under separate cover and as an accompaniment to this EIR are the Technical Appendices. In addition to the NOP and letters received in response to the NOP (Appendix A), the Technical Appendices include the various supporting documents used in preparing this EIR, including two biology reports (Appendices B1 and B2), three geology reports (Appendices C1, C2 and C3), two hydrology/drainage reports (Appendices D1 and D2), a traffic study (Appendix E), a noise report (Appendix F), an air quality report (Appendix G), five cultural resources reports (Appendices H1 - H5), two water service reports (Appendices I1 and I2), two sewer service reports (J1 and J2), two phase I environmental assessments (Appendices K1 and K2) and correspondence from public service agencies (Appendix L).

In addition to the documents appended to this EIR and as permitted by State CEQA Guidelines §15150, this EIR references several technical studies, analyses and reports which have been incorporated by reference. Referenced documents are briefly summarized in the appropriate section(s) of this document and the relationship between the incorporated part of the referenced document and the EIR has been described. In addition to the project-specific technical reports included in the Appendices, other documents and reference sources which have been used in the preparation of this EIR are identified in Chapter 10.0, REFERENCES.

1.4 SUMMARY OF PROPOSED PROJECT ACTIONS

The 2,658-acre *Rancho Encantada* Precise Plan area is located in the Future Urbanizing Area (FUA) of the City of San Diego. The Project proposes 834 single-family lots, two institutional sites, 106 multi-family units, an elementary school and park site, roadways, landscaping, utility improvements and open space. One existing single family residence would be retained on 1.7 acres of the Montecito site. Off-site roadway improvements are proposed west of the property on Pomerado Road and off-site sewer and water improvements are proposed north and west of the site in Beeler Canyon Road, Pomerado Road and other off-site property. Off-site intersection improvements also would occur as a part of the proposed Project. Specific discretionary actions required by the City of San Diego and evaluated by this EIR include a General Plan Amendment, a Precise Plan, three PRD Permits, two VTMs, a Resource Protection Ordinance (RPO) Permit, and a Multiple Habitat Planning Area (MHPA) boundary adjustment. A rezone also is evaluated for the Sycamore Estates sub-project. This EIR also serves as the environmental review for various state and federal permits necessary to implement the Project. Project implementation would also require ministerial approval of final maps, grading permits, etc. from the City of San Diego. Off-site improvements proposed in the City of Poway would require construction permits from the City of Poway. Separate state and federal permits would be issued for each of the two sub-projects so that they could proceed independently. Such permits would include 401 Regional Water Quality Board Certifications, U.S. Army Corps of Engineers (ACOE) Section 404 Permits for impacts to wetland habitat, and Section 1603 Streambed Alteration

Agreements with the California Department of Fish and Game (CDFG). Due to the degree of analysis provided in this Program EIR, if Initial Studies prepared for future implementing actions of the *Rancho Encantada* project are found to be within the scope of the overall Project analyzed in this EIR, no new environmental documents would be required. Actions associated with the Project are summarized below; a detailed description of each action required for Project implementation is included in Section 3.0, PROJECT DESCRIPTION.

- ~~**Development Agreement Amendment:** A Development Agreement Amendment between the City of San Diego and the owner of the Sycamore Estates sub-project site is proposed to provide an addition to the City's MHPA and provide the developer of the Sycamore Estates sub-project site with more certainty as to the development of the site.~~
- Agreement Between the City of San Diego and the Owners of Sycamore Estates:** An agreement between the City of San Diego and the owner of the Sycamore Estates sub-project is proposed to modify the obligations of a previously approved Development Agreement. Among other provisions, the new agreement would obligate Sycamore Estates to convey Park Land to the City for the expansion of Mission Trails Regional Park, to add new MHPA land to the City's MSCP Preserve, and to establish an endowment trust fund for long-term maintenance of conserved property within Sycamore Estates.
- Precise Plan:** A Precise Plan is proposed for *Rancho Encantada* that would serve as the City of San Diego's detailed long-range plan for the development of the 2,658-acre project area. The Precise Plan also would serve as the primary basis for reviewing concurrent or subsequent development plans, subdivisions and other discretionary permits for the property.
- General Plan Amendment:** The Precise Plan is considered part of the Land Use element of the General Plan so its adoption would be considered an amendment to the General Plan.
- Planned Residential Development Permits:** An independent PRD Permit is proposed for the Montecito sub-project and two independent PRD Permits are proposed for the Sycamore Estates sub-project, one for the single-family residential areas and school/park site and a second for the affordable housing site.
- Vesting Tentative Maps:** Independent VTMs are proposed for both the Montecito and Sycamore Estates sub-projects. The VTMs identify all necessary off-site roadway and infrastructure improvements.
- Resource Protection Ordinance Permit:** The City of San Diego regulates development of environmentally sensitive lands through the RPO for applications deemed complete prior to January 1, 2000. The RPO applies to wetlands, wetland buffers, floodplains, hillsides, biologically sensitive lands and significant prehistoric and historic resources. Because sensitive lands occur on the site, a RPO permit is required for the Project in accordance with §101.0462 of the San Diego Municipal Code. Although the City's Municipal Code (containing RPO) was replaced by the newly approved Land Development Code (containing the Environmentally

Sensitive Lands Ordinance [ESL]) on January 1, 2000, the *Rancho Encantada* project is still subject to the 1999 Municipal Code requirements because the sub-project applications were deemed complete prior to the effective date of the Land Development Code. For this reason, the Project is subject to RPO instead of ESL.

- ❑ **Multiple Habitat Planning Area Boundary Adjustment:** The proposed boundary adjustment would consist of reducing the size of the MHPA on the Montecito sub-project site and increasing the size of the MHPA on the Sycamore Estates sub-project site.
- ❑ **Rezone:** The Sycamore Estates sub-project site is proposed to be rezoned from AR-1-1 (Agricultural-Residential), IL-3-1 (Industrial-Light), and IH-2-1 (Industrial-Heavy), to AR-1-1. Rezones are not requested for either the Montecito sub-project or the City of San Diego owned parcel.

1.5 RESPONSIBLE AND TRUSTEE AGENCIES

State law requires that all EIRs be reviewed by trustee and responsible agencies. A *Trustee Agency* is defined in Section 15386 of the State CEQA Guidelines as “a state agency having jurisdiction by law over natural resources affected by a project which are held in trust for the people of the State of California.” Per Section 15381 of the CEQA Guidelines, the term ‘*Responsible Agency*’ includes all public agencies other than the Lead Agency, which have discretionary approval power over the project.

In the case of the *Rancho Encantada* project, the Lead Agency is the City of San Diego, as defined by Section 15367 of CEQA. Responsible and/or Trustee Agencies, which may have an interest in the Project, include the City of Poway, ACOE, CDFG, the United States Fish and Wildlife Service (USFWS), and the San Diego Regional Water Quality Control Board (RWQCB). A description of the state and federal permits required to implement the Project is included in Section 3.9 of this EIR.

In accordance with State CEQA Guidelines §15206, the proposed Project meets the criteria of having statewide, regional, or areawide significance; thus, is subject to review by state agencies through distribution by the California State Clearinghouse.

2.0 Environmental Setting

2.1 PROJECT LOCATION

The *Rancho Encantada* project and the Montecito and Sycamore Estates sub-projects are located east of Pomerado Road and south of Beeler Canyon Road in the City of San Diego, California. The project site lies within the U.S. Geological Survey 7.5 minute topographic map and Section 25, Range 2 West, Township 14 South. Figure 2-1, *Regional Map*, depicts the location of the project site in relation to its regional surroundings. *Rancho Encantada* is bordered on the north by the City of Poway and on the west by the City of San Diego communities of Scripps Ranch and Miramar Ranch North. Undeveloped land that is part of the Sycamore Canyon County Open Space Preserve lies to the east and to the south is the United States Marine Corps Air Station (MCAS) Miramar. The project site is located approximately two miles east of Interstate 15 (I-15). Figure 2-2, *Vicinity Map*, depicts the Project's location within its immediate surroundings. Figure 2-3, *Areas Map*, illustrates the relationship of the various sub-project sites within the *Rancho Encantada* Precise Plan area.

2.2 SURROUNDING LAND USES AND DEVELOPMENT

2.2.1 SURROUNDING BUILT ENVIRONMENT

Land uses surrounding *Rancho Encantada* are shown in Figure 2-4, *Surrounding Land Uses*. On the immediate south is MCAS Miramar. This facility is federally owned and operated and covers approximately 24,000 acres, which is divided by I-15. The area west of I-15 supports residential, commercial, administrative, industrial and aviation uses. The area east of I-15, including the portion of MCAS Miramar south of *Rancho Encantada* is used for military training purposes. A San Diego Gas and Electric Company (SDG&E) utility substation is located on the MCAS Miramar property, approximately 200 feet south of the project site boundary, and a U.S. Forest Service facility used for vehicle repair and equipment storage is located southeast of the substation. A Draft Integrated Natural Resources Management Plan (DINRMP) for MCAS Miramar is currently under review by the federal government. The DINRMP will govern MCAS Miramar's natural resource management program and the military operational requirements of the air station for the next five years.

The northerly edge of the Montecito sub-project site lies at the bottom of Beeler Canyon and several twelve single family residential lots of one-acre to over four acres in size are located in this area. Some of these homes are located in the City of Poway and some are located in the City of San Diego and are accessed via Beeler Canyon Road. A horse ranch of approximately 60 acres is also located in this area along Beeler Canyon Road. The northerly edge of the Sycamore Estates sub-project site coincides with the Beeler Canyon Road right-of-way. The Palomar Transit Mix quarry, a resource extraction site operated by CalMat, also is located north of the Sycamore Estates sub-project's northwestern property boundary and is accessed via Kirkham Way.

North of Beeler Canyon Road the land contains manufactured slopes and natural slopes that rise from Beeler Creek to industrial and commercial properties in the City of Poway. Immediately North of the *Rancho Encantada* project boundary is the South Poway Business Park, a 700-acre complex, encompassing the City's main industrial area. As part of the South Poway Planned Community, the Business Park includes light industrial and manufacturing, warehousing and distribution, and research and development businesses. In total, the City of Poway encompasses 39.2 square miles with a current population of approximately 49,500. Valley Elementary School, Meadowbrook Middle School, and Rancho Bernardo High School, which serve the project area, are located north of the site in the City of Poway, approximately 2.5 miles, 3.0 miles, and 4.5 miles north of site, respectively.

The western border of the site is formed by Pomerado Road. Immediately west of Pomerado Road and west of the project site is the community of Scripps Miramar Ranch. The community of Miramar Ranch North is located north of Scripps Miramar Ranch, with the easterly edge of Miramar Ranch North located approximately ½-mile from the project site. These communities are predominantly residential in the vicinity of the project site, but also include significant commercial and employment land uses. The nearest public park is Cypress Canyon Park located in the community of Scripps Miramar Ranch, just west of Pomerado Road, southwest of the project site. East of the site is the Sycamore Canyon County Open Space Preserve that is managed by the County of San Diego Department of Parks and Recreation. North of the open space preserve are rural residential homes and ranches located in unincorporated San Diego County.

2.2.2 SURROUNDING PLANNED DEVELOPMENT

The San Diego County Water Authority has proposed several alternative water pipeline alignments in the vicinity of the project site. Three of the alternatives traverse or are adjacent to the proposed project site. The San Diego County Water Authority has prepared an EIR/EIS for the proposed Water Storage Project (State Clearinghouse No. 93011028; Army Corps File No.95-20092-DZ) which analyzes these alternative alignments. That document is herein incorporated by reference and is available for review at the San Diego County Water Authority, 3211 Fifth Avenue, San Diego CA 92103.

The United States Marine Corps is evaluating plans to develop up to 1,600 military housing units on a portion of MCAS Miramar and has identified four potential sites. One of these potential sites is located south of and immediately adjacent to the Montecito sub-project site. The preliminary indications from the Marine Corps are that this alternative site, if selected, could accommodate up to 1,000 units.

2.2.3 SURROUNDING NATURAL ENVIRONMENT

The project site is surrounded by lands that are primarily undeveloped to the south, east, and northeast. MCAS Miramar lies to the south of the project site and is largely undeveloped east of Interstate 15. The Sycamore Canyon County Open Space Preserve, which is a public open space preserve managed by the County of San Diego, is located to the east. Beeler Canyon lies along the north project site boundary, and is partially developed with some rural residential homes and the Palomar Transit Mix quarry. Sycamore Canyon lies off-site and to the southeast and is undeveloped.

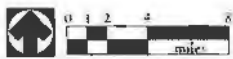
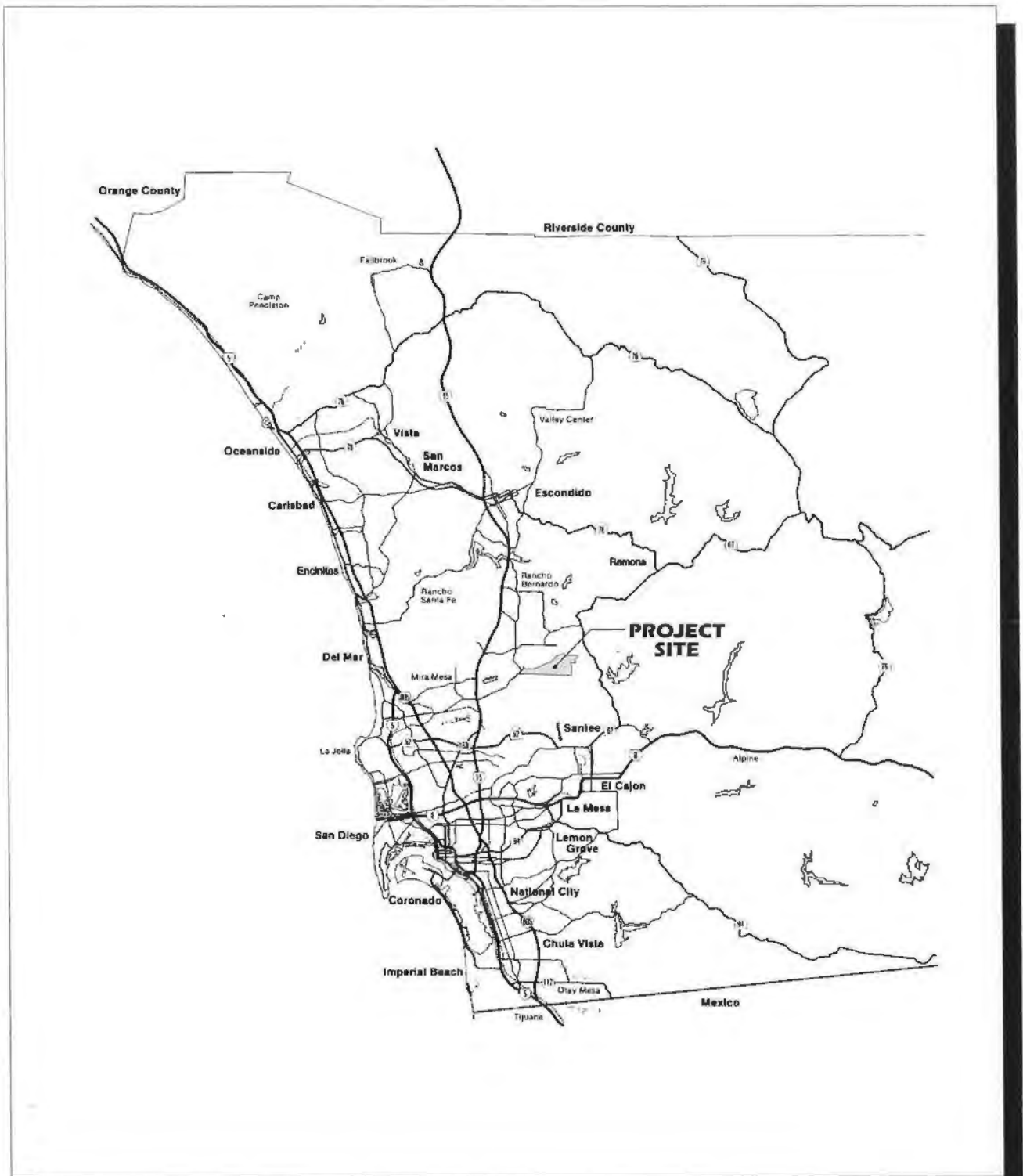


Figure 2-1
REGIONAL MAP

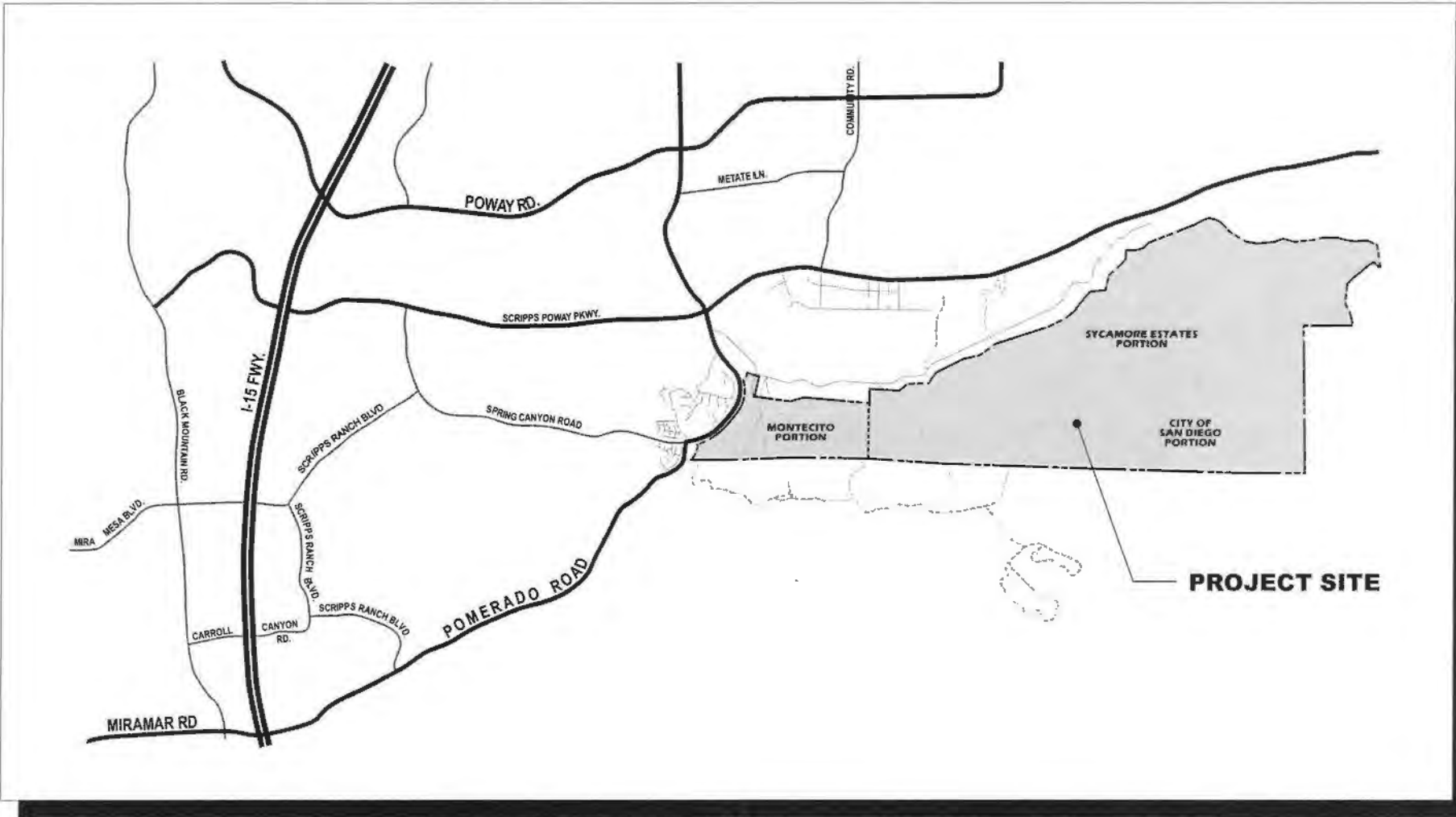


Figure 2-2
VICINITY MAP

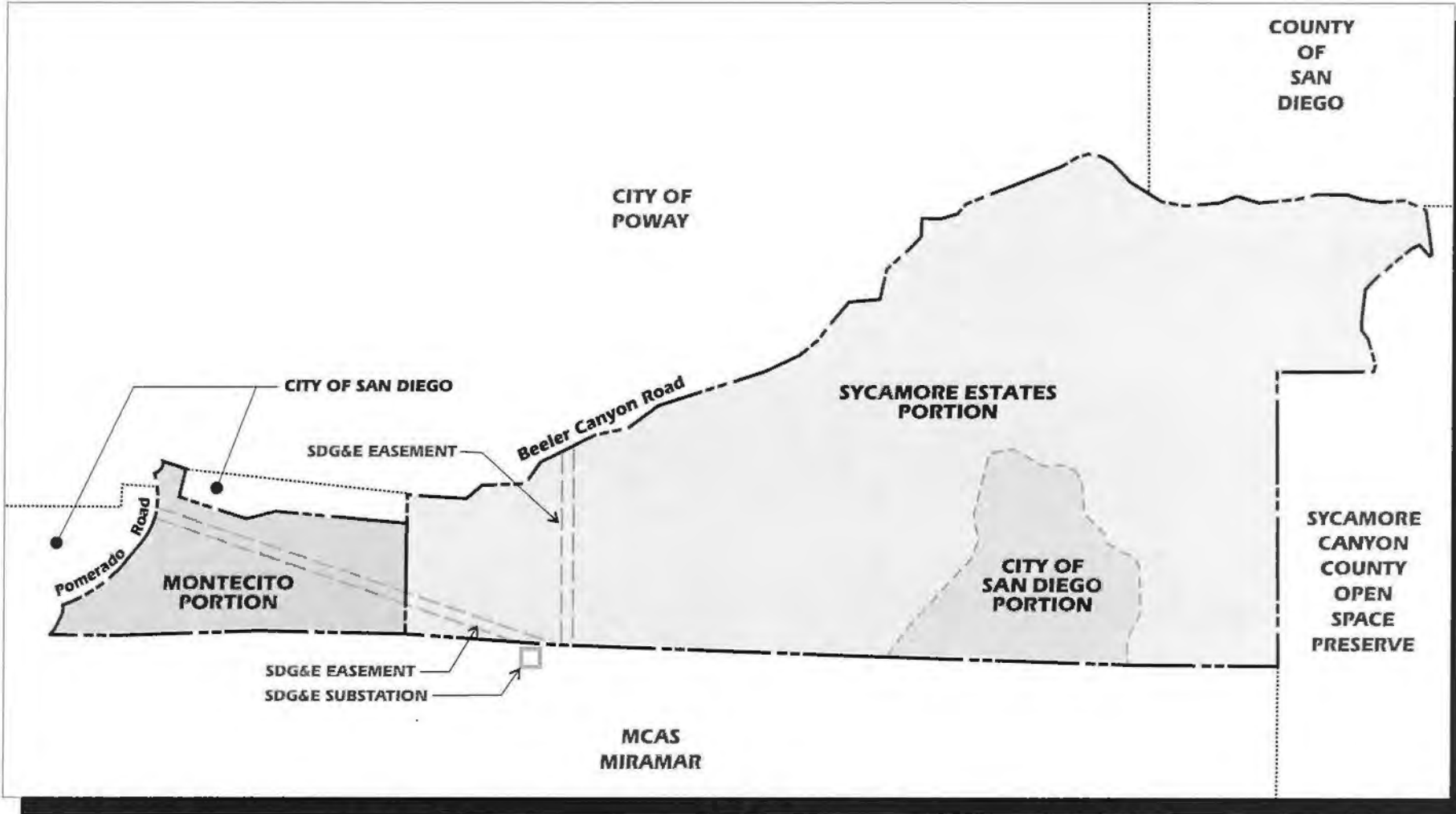


Figure 2-3
AREAS MAP

RURAL
RESIDENTIAL

RESOURCE
EXTRACTION

SINGLE
FAMILY
LOTS

CYPRESS
CANYON
PARK

MIRAMAR
RANCH
NORTH

SDG&E
SUBSTATION



← SAN VICENTE
RESERVOIR

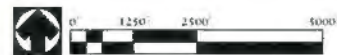


Figure 2-4
SURROUNDING
LAND USES

Two regional wildlife corridors occur on or adjacent to the Project: Beeler Canyon, an east-west corridor, along the northern Project boundary, and Sycamore Canyon, a north-south corridor, along the eastern MHPA boundary. The adjacent open space area within the City of Poway consists of natural habitats including the existing drainage within Beeler Canyon and the southern-facing slopes of Beeler Canyon. These slopes consist of part natural habitat and part revegetated natural habitat. The revegetated areas are associated with former fill activities for the South Poway Business Park. The width of the undeveloped portion of Beeler Canyon within the City of Poway ranges from approximately 1,200 feet to 1,600 feet. Limited impacts to wildlife movement may occur as a result of increased activity and increased night lighting along the corridor boundary, which were considered in the preserve configuration developed for the MSCP. These impacts would be reduced by the expansion of the MHPA proposed by the Project.

Except for a small portion along the southeastern project boundary, the project site is located in the Peñasquitos Watershed, which drains to Los Peñasquitos Lagoon, located approximately 12 miles west of the project site. A high level of urban development exists within the watershed. Under existing conditions, runoff from the project vicinity collects in natural drainage courses and storm drains and eventually discharges to the Los Peñasquitos Lagoon.

2.3 EXISTING PHYSICAL SITE CONDITIONS

The project site is an irregular-shaped land area consisting of approximately 2,658 acres. Except for private roads, trails, fire breaks, one existing residence and five existing industrial use areas, a majority of the site is undeveloped open space. Two major SDG&E transmission line corridors run through the property, containing overhead power lines, poles, and support structures. One existing residence is located in the northern portion of the Montecito sub-project site and is accessed via a private driveway connecting to Beeler Canyon Road. The Sycamore Estates sub-project site has been owned by General Dynamics since the 1960's, and defense-related manufacturing uses have occurred on a portion of the site since that time. These manufacturing uses occur in five small industrial areas, accessed via Beeler Canyon Road. There are numerous private roads that traverse the sub-project site that lead to the existing buildings (along with lighting of these areas). Two water storage tanks are located on the Sycamore Estates sub-project site, owned privately by General Dynamics. A segment of the California Aqueduct traverses the eastern portion of the Sycamore Estates sub-project site in a north/south alignment.

Topography and elevation of the project site are varied, as shown in Figures 2-5, *City of San Diego Engineering Map*, and 2-6, *Topographic Map*. The landform is characterized by many narrow divides, v-shaped valley bottoms and steep side slopes. The elevation of the property ranges from approximately 1,177 feet above mean sea level (AMSL) in the northeastern portion of the site to 600 feet AMSL in the northwest portion.

The northern portion of the Montecito sub-project site, the eastern portion of the Sycamore Estates sub-project site (with the exception of an approximate 34-acre "island" containing existing industrial use areas and fire breaks), and the entire City of San Diego owned parcel are located within the City of San

Diego's Multiple Habitat Planning Area (MHPA), as shown on Figure 2-7, *Existing MHPA Map*. Vegetation on the site includes nine primary vegetation communities including mulefat scrub, wet meadow, oak woodland, native and non-native grassland, Diegan coastal sage scrub, southern mixed chaparral, chamise chaparral, southern willow scrub and eucalyptus woodland. In addition, ephemeral drainages are present on the site, which are defined as unvegetated waters of the U.S. Disturbed areas also are located on the property and include several trails, private roads, fire breaks and industrial use areas.

2.4 PLANNING CONTEXT

Provided below is a brief description of the applicable plans and policies that pertain to the project site. A more detailed description and an analysis of Project consistency with these plans and policies are included in Section 4.1, LAND USE, of this EIR.

2.4.1 CITY OF SAN DIEGO PROGRESS GUIDE AND GENERAL PLAN

As required by State Planning and Zoning Law, the City of San Diego has developed "a comprehensive, long-term . . . plan for the physical development of the . . . City, and of any land outside its boundaries which . . . bears relation to its planning" (Section 65300 of the Government Code of the State of California). For the City of San Diego, this plan is known as the Progress Guide and General Plan. Prepared by the City in 1979, the Progress Guide and General Plan consists of development policies, in the form of Findings, Goals, Guidelines, Standards and Recommendations, for a variety of land use elements. The Progress Guide and General Plan has been amended since 1979, with the most recent reprint of the document occurring in 1989.

With the original preparation of the Progress Guide and General Plan in 1979, the City established "tiers" for accommodating growth, designated as Urbanized, Planned Urbanizing and Future Urbanizing. The Progress Guide and General Plan identifies the project site as an Area For Future Growth Land Use within the Future Urbanizing area (FUA). The goal of the Future Urbanizing designation is to prevent premature development of these areas at urban densities until it had been determined that they are needed to accommodate the City's growth. Properties within the FUA are permitted to develop in accordance with their underlying zoning designation (see subsection 2.4.2, Zoning) and in accordance with City Council Policy 600-29 (see subsection 2.4.3, Proposition A/Council Policy 600-29).

2.4.2 ZONING

On January 1, 2000, the Land Development Code for the City of San Diego became effective. Because the sub-project applications were deemed complete prior to January 1, 2000, development would be subject to the development standards contained in the San Diego Municipal Code that existed at the time the project applications were deemed complete. The nomenclature of the Land Development Code, however, is used herein to describe existing zoning. Figure 2-8, *Existing Zoning*, depicts the existing zoning designations of the project site. A description of the existing zoning for each of three land areas comprising *Rancho Encantada*, is provided below.

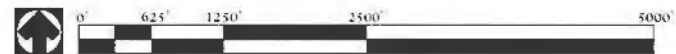
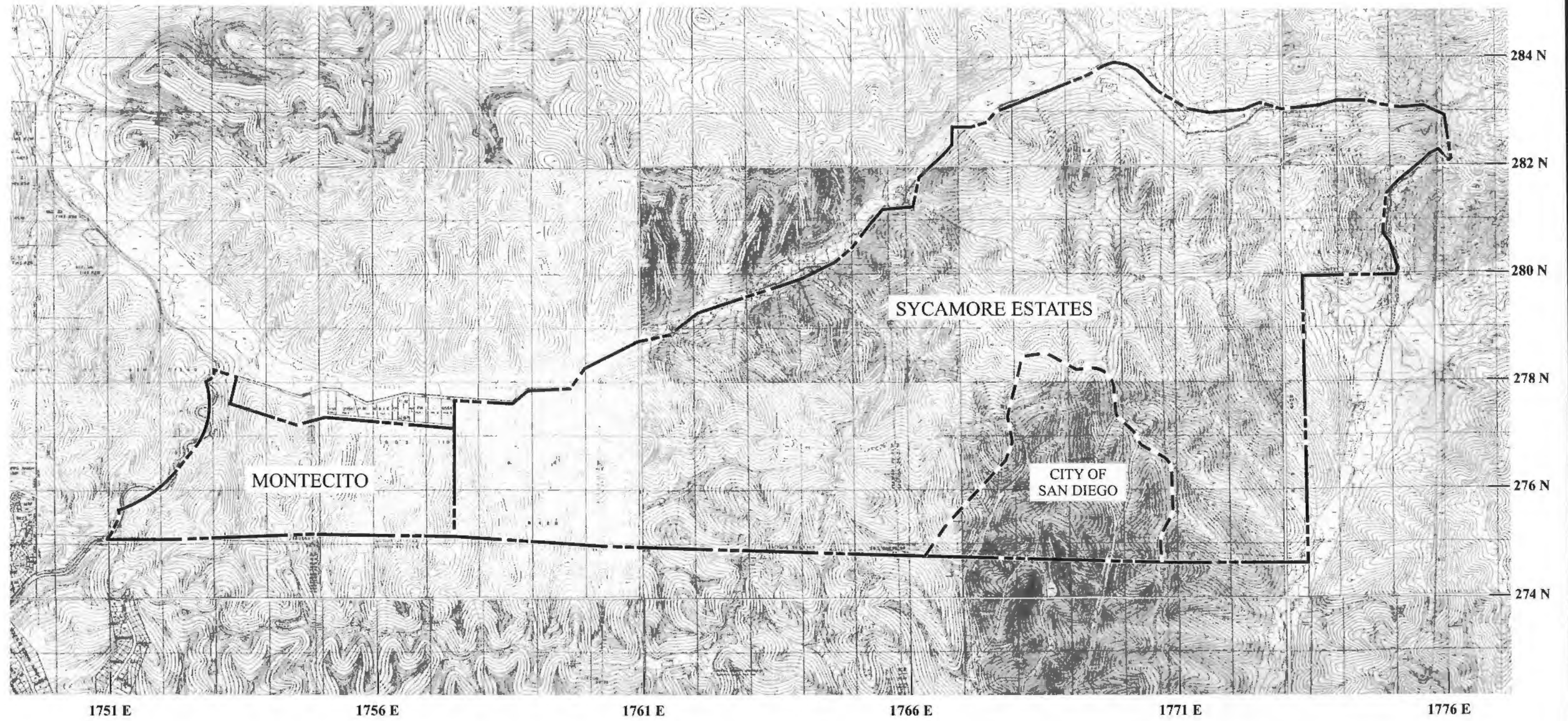
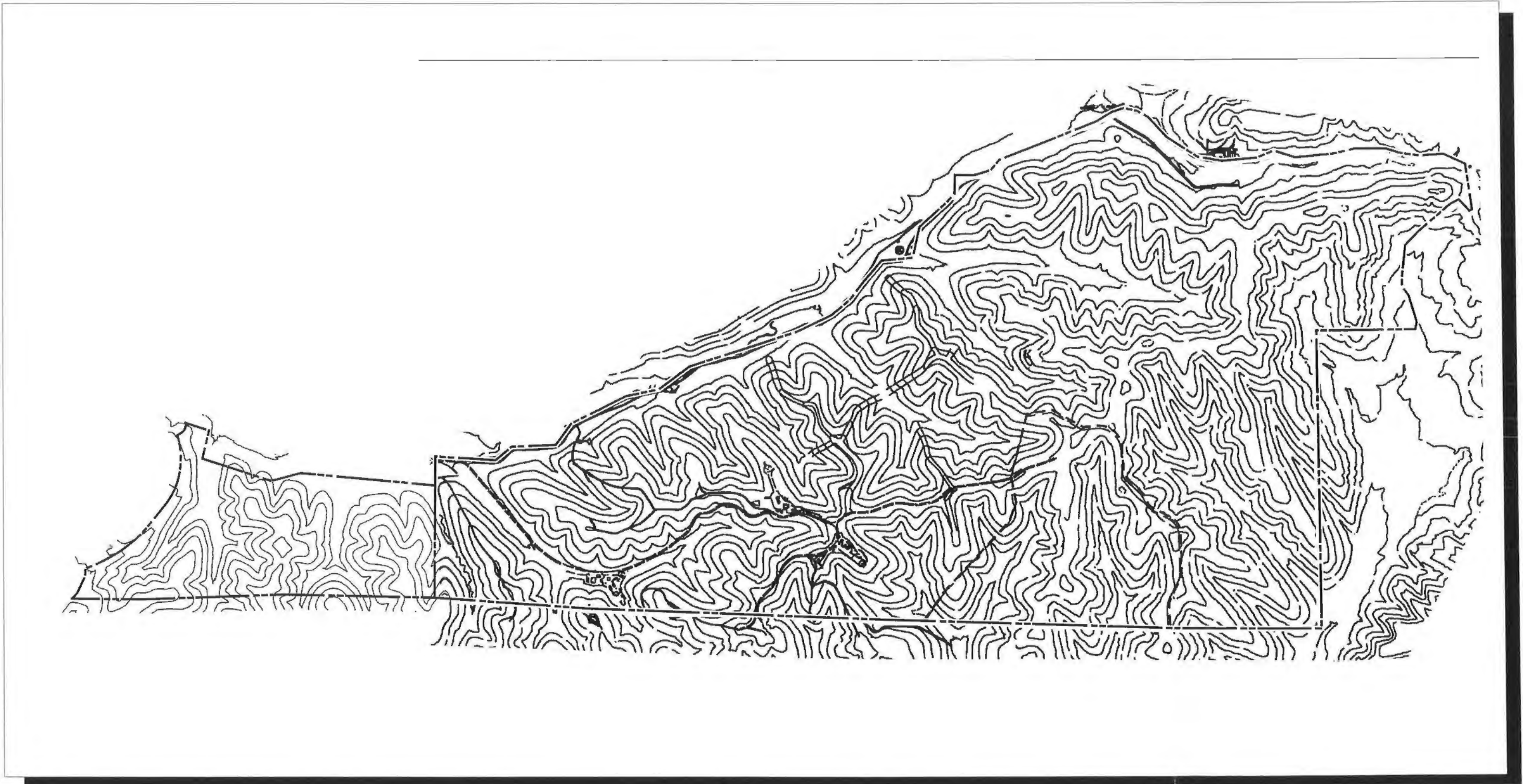
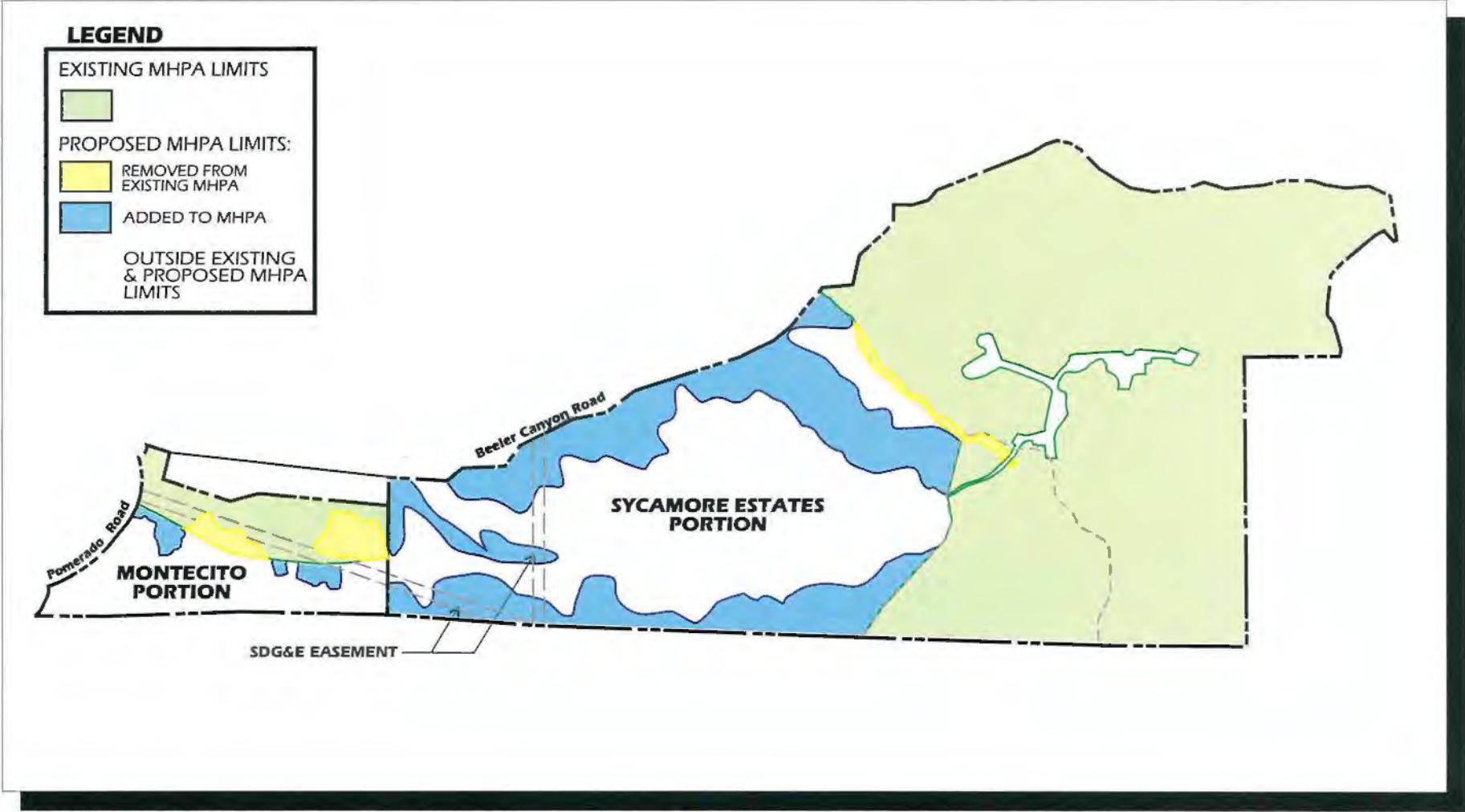


Figure 2-5
CITY OF SAN DIEGO ENGINEERING MAP





NOTE: Per MSCP Guideline C27, existing fire breaks on the Sycamore Estates sub-project site are excluded from the MHPA. Fire breaks are not graphically illustrated on this exhibit.

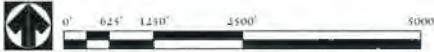
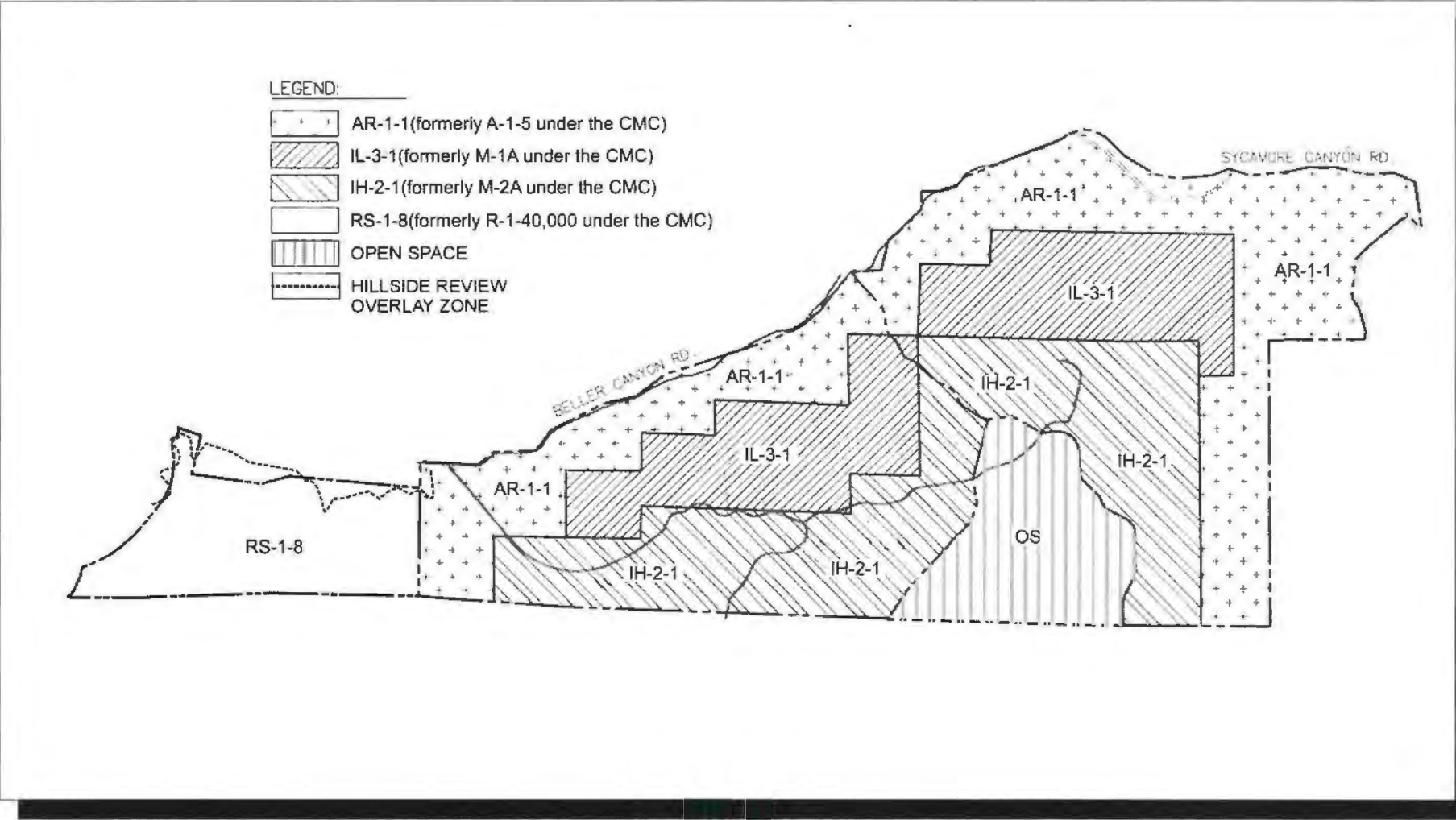


Figure 2-7
EXISTING MHPA MAP



CMC = City of San Diego Municipal Code in effect prior to January 1, 2000



Figure 2-8
EXISTING ZONING

Montecito Sub-Project

The Montecito sub-project site is zoned RS-1-8 (formerly R-1-40,000 under the City Municipal Code) and 94 percent of the site is covered by the Hillside Review (HR) overlay zone. The City's RS-1-8 zone is a residential zone that requires a minimum of 40,000 square feet per each residential unit. The intent of the HR overlay zone is to encourage a sensitive form of development and use that complements the natural and visual character of the site and surrounding community. This overlay zone ensures that development occurs in a manner that does not create soil erosion, silting of the lower slopes, slide damage, flooding problems and severe cutting of hillsides.

Sycamore Estates Sub-Project

The Sycamore Estates sub-project site is zoned AR-1-1, IL-3-1 and IH-2-1 (formerly A-1-5, M-1A and M-2A under the City Municipal Code). AR-1-1 is an Agricultural-Residential classification that requires a minimum of ten acres for each residential dwelling unit. IL-3-1 and IH-2-1 are industrial classifications. The IL-3-1 and IH-2-1 zones allow for such uses as vehicle sales, wholesale, distribution, storage, and light manufacturing. The IL-3-1 zone also allows retail sales, commercial services and offices, and the IH-2-1 zone allows heavy manufacturing.

City of San Diego Owned Parcel

The 248-acre City of San Diego owned parcel was rezoned OS-1-2, an open space designation, when the land was conveyed to the City for inclusion in the MHPA.

2.4.3 PROPOSITION A / COUNCIL POLICY 600-29

Council Policy 600-29, "Maintenance of the Future Urbanizing Area as an Urban Reserve," was enacted to avoid premature urbanization, to conserve open space and natural environmental features and to protect the fiscal resources of the City by precluding costly sprawl and/or leapfrog urban development. Council Policy 600-29 permits four development options on property located in the FUA which is zoned agricultural. One of these options is Rural Cluster Development. Under this option, development is permitted at the density permitted by the property's underlying zone, but clustered in order to promote more efficient land utilization and land conservation. Under a second option, development is permitted pursuant to the PRD regulations at a density not to exceed one dwelling unit per four acres for agriculturally zoned land.

Except for development as permitted under Council Policy 600-29, Proposition A, the "Managed Growth Initiative," specifies that the existing non-urban land use pattern and character of the Future Urbanizing Area should be retained until such time as the City Council and the electorate approve a phase shift reclassifying the land from Future Urbanizing to Planned Urbanizing and a land use plan is adopted. The proposed Project is not proposing a phase shift via a citywide vote per the Managed Growth Initiative, but instead proposes development in accordance with Council Policy 600-29. The Montecito sub-project would develop under its existing RS-1-8 zone (formerly R1-40,000 under the City's pre-

2000 Municipal Code) and the Sycamore Estates sub-project would be developed under a proposed rezone to AR-1-1 (formerly A-1-10 under the City's pre-2000 Municipal Code).

2.4.4 COUNCIL POLICY 600-40

The purpose of City Council Policy 600-40 is to provide guidelines for the preparation and approval of long range plans to ensure a thorough analysis of site constraints and opportunities early in the planning process, including resources protected by RPO.

2.4.5 RESOURCE PROTECTION ORDINANCE

The City of San Diego regulates development of environmentally sensitive lands through the RPO, San Diego Municipal Code §101.0462. The RPO applies to wetlands, wetland buffers, floodplain, hillsides, biologically sensitive lands and significant prehistoric and historic resources. Because sensitive habitats, wetlands, cultural resources, and hillsides occur on portions of the project site, in accordance with Section 101.0462 of the 1999 San Diego Municipal Code, a RPO Permit is required for implementation of the proposed Project. Although the City's 1999 Municipal Code (containing RPO) was replaced by the Land Development Code (containing the Environmentally Sensitive Lands Ordinance [ESL]) on January 1, 2000, the *Rancho Encantada* project is still subject to Municipal Code requirements because the Montecito and Sycamore Estates sub-project applications were deemed complete prior to the effective date of the Land Development Code. For this reason, the Project is subject to RPO instead of ESL.

2.4.6 MULTIPLE SPECIES CONSERVATION PLAN

The City of San Diego's Multiple Species Conservation Program (MSCP) Subarea Plan was approved in March 1997. The primary goal of the MSCP is to conserve viable populations of sensitive species and to conserve regional biodiversity while allowing for reasonable economic growth. One of the primary objectives of the MSCP is to identify and maintain a preserve system which allows for animals and plants to exist at both the local and regional levels. This preserve system is a network composed of biological core resource areas (large blocks of habitat) and linkages/wildlife corridors.

The MSCP identifies "core biological resource areas," which are large blocks of native habitat having the ability to support a diversity of plant and animal life. "Linkages" were also planned to provide movement between the core areas. The MSCP identifies a 56,831-acre Multiple Habitat Planning Area (MHPA) in the City for preservation of core biological resource areas and corridors targeted for preservation. The northern portion of the Montecito sub-project site, the eastern portion of the Sycamore Estates sub-project site (with the exception of an approximate 34-acre "island" containing existing buildings, access roads and fire breaks), and the entire 248-acre City of San Diego owned parcel are included in the Northern area of the MHPA. Figure 2-9, *MSCP Subarea Plan - Northern Area*, shows the project site in relation to the Northern Area of the City's MHPA. The northern area consists primarily of wildlife corridors providing linkages to core areas in the City including Del Mar Mesa, Los Peñasquitos Canyon Preserve, Los Peñasquitos Lagoon, Torrey Pines State Park, the San Dieguito River Valley Regional Park and the Black Mountain Area. Linkages to planned open space areas in the City of

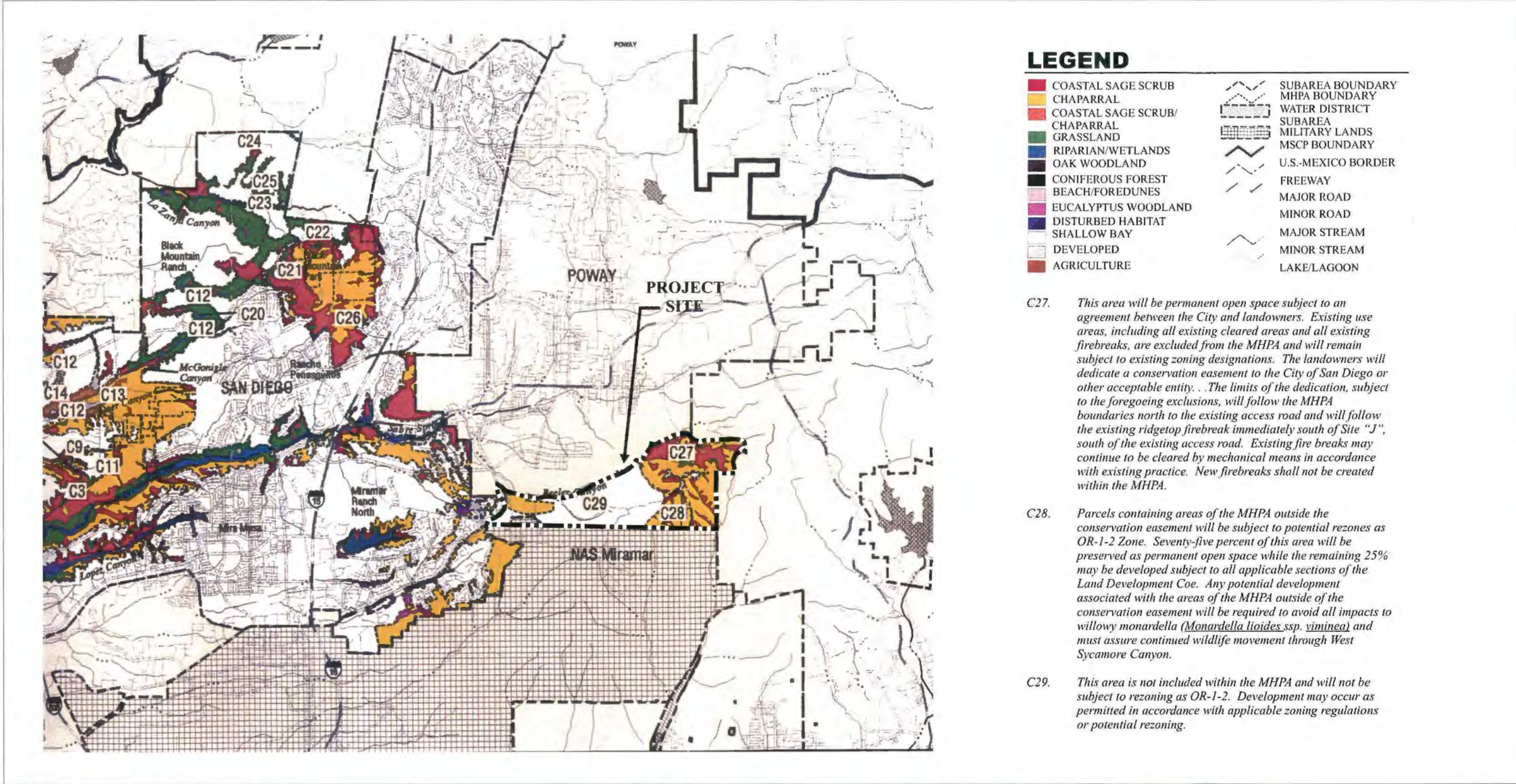
Poway and County of San Diego are also provided. Land uses that are considered compatible with the objectives of the MSCP and are permitted uses in MHPA open space include:

- passive recreation;
- utility lines and roads (must adhere to MHPA construction and maintenance policies);
- limited water facilities and essential public facilities;
- limited low density residential use;
- brush management zone 2; and
- limited agriculture.

The City of San Diego's MSCP Subarea Plan states that adjustments to the MHPA boundary line are permitted without the need to amend the City's MSCP Subarea Plan, provided the boundary adjustment results in an area of equivalent or higher biological value.

2.4.6 CITY OF POWAY COMPREHENSIVE PLAN AND HABITAT CONSERVATION PLAN

As a design option of the proposed Project, an off-site gravity sewer line is proposed in the City of Poway. As such, the Poway Comprehensive Plan, consisting of the City's General Plan, Zoning Development Code and Master Environmental Assessment, and the City of Poway's Habitat Conservation Plan, are applicable to the proposed Project. A portion of the gravity sewer line alignment would be located in the South Poway Planned Community (SPPC) Specific Plan area of the City's General Plan, a 2,500-acre planned community located in the southern portion of the City and immediately north of the *Rancho Encantada* project boundary.



SOURCE: City of San Diego MSCP Subarea Plan

Figure 2-9
MSCP SUBAREA PLAN-
NORTHERN AREA

3.0 Project Description

This EIR analyzes potential environmental effects associated with the *Rancho Encantada* project and the Montecito and Sycamore Estates sub-projects. In addition to a proposed Precise Plan and related General Plan Amendment, two independent Vesting Tentative Maps (VTMs) and three independent Planned Residential Development (PRD) Permits are proposed. The VTMs and PRDs are proposed to subdivide the sub-project sites and establish development standards for residential and open space land uses on the Montecito sub-project site and residential, institutional, school/park, and open space land uses on the Sycamore Estates sub-project site. A Resource Protection Ordinance (RPO) permit and a Multiple Habitat Planning Area (MHPA) Boundary Adjustment are required to implement the Precise Plan. A Rezone is required for the Sycamore Estates sub-project. Construction permits from the City of Poway would be required for proposed off-site infrastructure improvements. In addition, various state and federal permits are required for each of the two sub-projects due to wetland impacts. This EIR addresses the specific discretionary actions necessary to implement the proposed Project and the two independent sub-projects. The Project's goals and objectives and a detailed description of actions associated with the proposed Project are provided below. The Montecito and Sycamore Estates sub-projects are being processed by the City independently from one another. Although both sub-projects are evaluated by this EIR, neither sub-project is dependant on the other.

3.1 PROJECT GOALS AND OBJECTIVES

The overall project goal is to provide a variety of single-family detached and affordable multi-family attached residential units in a manner that is generally consistent with applicable plans, policies and regulations.

The specific project objectives to reach this goal include the following:

- Develop a variety of single-family detached and affordable multi-family attached residential units.
- Provide affordable multi-family housing that contributes to the City's share of regional inclusionary housing goals.
- Provide an on-site public park site to be conveyed to the City of San Diego and an adjacent elementary school site to be conveyed to the Poway Unified School District.
- Locate development on the least environmentally sensitive portions of the site and preserve the remainder of the site as open space.
- Allow for development of the Montecito and Sycamore Estates portions of the Project as independent sub-projects.
- Assure a diverse and high-quality residential development by providing individual guidelines

- for site design, architecture and landscaping for each sub-project site.
- Provide for the siting of public access to an on-site trail system that will connect with existing regional trails and open space systems.
 - Designate appropriate vehicular access points on Pomerado Road and Beeler Canyon Road.
 - Provide public facilities, infrastructure, parkland and institutional land uses necessary to service the future residents.
 - Implementation of the MSCP and establishment of an open space system which preserves environmentally sensitive lands, provides a functional and regionally connected wildlife corridor system, complies with the City's Resource Protection Ordinance, and is consistent with regional wildlife and environmental planning efforts.
 - Allow for adaptive re-use of a portion of the existing buildings east of Planning Area 11. Such re-use must be low-impact in nature and conform to the Future Urbanizing designation.

3.2 PRECISE PLAN

The Precise Plan proposed for *Rancho Encantada* must be approved by the City Council in order to be adopted. Upon adoption of the Precise Plan, the plan will become the basis for reviewing tentative maps and development plans proposed for buildout of the Project. Figure 3-1, *Precise Plan Land Use Plan*, illustrates the distribution of land uses for the *Rancho Encantada* Precise Plan. Table 3-1, *Proposed Land Use Acreage Summary*, tabulates the proposed land use areas for the overall Precise Plan area.

In addition to the proposed land use plan, the Precise Plan provides general guidelines and standards for grading, erosion control, architecture, landscaping, brush management, wall and fence design, lighting and conservation. The guidelines included in the Precise Plan are conceptual in nature and are subject to refinement and modification during the PRD permit and Tentative and Final Map stages of Project development.

3.2.1 RESIDENTIAL

The Precise Plan designates 474.8 acres for residential development with a maximum of 941 dwelling units. Four residential categories (Rural Residential, Very Low Density, Low Density, and Medium Density) are proposed, as shown in Figure 3-1. The Rural Residential category is applied to a 1.7-acre parcel within the Montecito sub-project site and is intended to accommodate one existing single family residence. The Very Low Density residential category accommodates densities of 1-3 dwelling units per acre (du/ac) and the Low Density residential category allows for densities of 3-5 du/ac. These two residential designations are primarily intended for single-family homes. Affordable multi-family units are planned for the Medium Density residential area at densities of 15-29 du/ac.

The overall Precise Plan density for the *Rancho Encantada* project site is approximately 0.35 dwelling unit per acre (941 units maximum / 2,658 acres = 0.35 du/ac). According to the Precise Plan, 835 single-family units and 106 affordable multi-family units are proposed. A total of 278 single-family units would occur on the Montecito sub-project site and total of 557 single family units and 106 multi-family units would occur on the Sycamore Estates sub-project site.

**Table 3-1
Proposed Land Use Acreage Summary¹**

Land Use	Montecito	Sycamore Estates	City of San Diego	Precise Plan Total
Existing Rural Residential	1.7	0.0	0.0	1.7
Very Low Density Residential	69.6	358.3	0.0	427.9
Low Density Residential	35.3	0.0	0.0	35.3
Medium Density Residential	0.0	9.9	0.0	9.9
School/Park ²	0.0	19.7	0.0	19.7
Institutional	0.0	11.4	0.0	11.4
Open Space ³	120.7	1,620.5 ⁴	248.0	1,989.2
Revegetated Manufactured Slopes	40.4	88.9	0.0	129.3
Major Roads	10.3	23.3	0.0 ⁵	33.6
Totals	278.0 ⁶	2,132.0 ⁶	248.0	2,658.0

1. Acreages are rounded and approximate.
2. If all or part of the school/park site is not ~~retained~~ acquired by the School District or the City of San Diego for school and park usage, the site would retain its underlying density of one residential unit per four acres, provided the maximum number of dwelling units defined by the Precise Plan is not exceeded.
3. Open space acreage includes sewer, water and drainage easements and facilities, trails and existing fire breaks.
4. Includes 38.5 acres of existing buildings that may be phased out and converted to open space or be used consistent with the open space designation. The future use of these buildings would be determined by the City of San Diego.
5. An existing rural road is located on the City of San Diego property within a 60' easement.
6. Total includes an SDG&E easement of 33.3 acres for Montecito and 11.1 acres for Sycamore Estates.

3.2.2 PUBLIC PARK/SCHOOL SITE

The Precise Plan identifies a public park/elementary school site on approximately 19.7 gross acres of the Sycamore Estates sub-project site. The park is expected to be approximately 4.0 net acres, with 10-12 net acres remaining for the elementary school site. The size of the park and school sites are determined by the number of units proposed in the *Rancho Encantada* project. Selection of recreational facilities for the park would be determined at a later stage of the planning process in consultation with the City of San Diego Parks and Recreation Department staff. School site facilities

would be determined by the Poway Unified School District. If all or part of the school/park site is not retained by the School District or the City of San Diego for school and park usage, the site may be converted to residential use, provided the maximum number of dwelling units specified for the Sycamore Estates sub-project (663) is not exceeded.

3.2.3 INSTITUTIONAL USES

Two institutional planning areas are proposed on the Sycamore Estates sub-project site (Planning Areas 8 and 8A). ~~Uses in these areas would include those uses allowed by a Conditional Use Permit (CUP) within the Future Urbanizing Area. These uses include, but are not limited to, churches, nurseries, recreational uses (non-commercial), and public utilities. The following uses may be permitted in areas designated as Institutional by the Rancho Encantada Precise Plan: churches, temples and places of religious assembly; botanical gardens and arboretums; educational facilities by a Conditional Use Permit (CUP); day care centers; interpretive centers; or any enterprise or business which the City of San Diego determines to be consistent with the intent and purpose of the institutional land use designation.~~

3.2.4 OPEN SPACE

More than 75 percent of the Precise Plan area would be preserved as open space, including approximately 120.7 acres on the Montecito sub-project site, 1,620.5 acres on the Sycamore Estates sub-project site, and the 248-acre City of San Diego owned parcel. Open space includes natural, undisturbed open space. In addition, firebreaks, trails, trailheads, SDG&E utility corridors and easements, water and sewer lines, pumping stations, water storage reservoirs, existing building pads that would be converted to open space or used consistent with the open space designation, and other utility infrastructure also are permitted in open space. A large percentage of the natural open space area is designated as part of the City of San Diego's MSCP through inclusion in the City's MHPA.

3.2.5 REVEGETATED MANUFACTURED SLOPES

Exterior manufactured slopes ~~required~~ proposed to support development areas are designated as revegetated manufactured slopes. These slopes are located on the perimeter of development and adjacent to natural open space and are important transition areas between development and natural open space. Where appropriate and in accordance with City brush management requirements, these slopes would be revegetated with native plant materials that are compatible with the plant species in the adjacent natural open space areas. Approximately 40.4 acres of manufactured open space would occur on the Montecito sub-project site and approximately 88.9 acres would occur on Sycamore Estates.

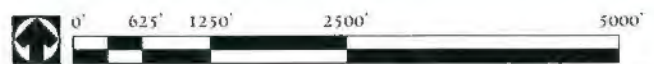
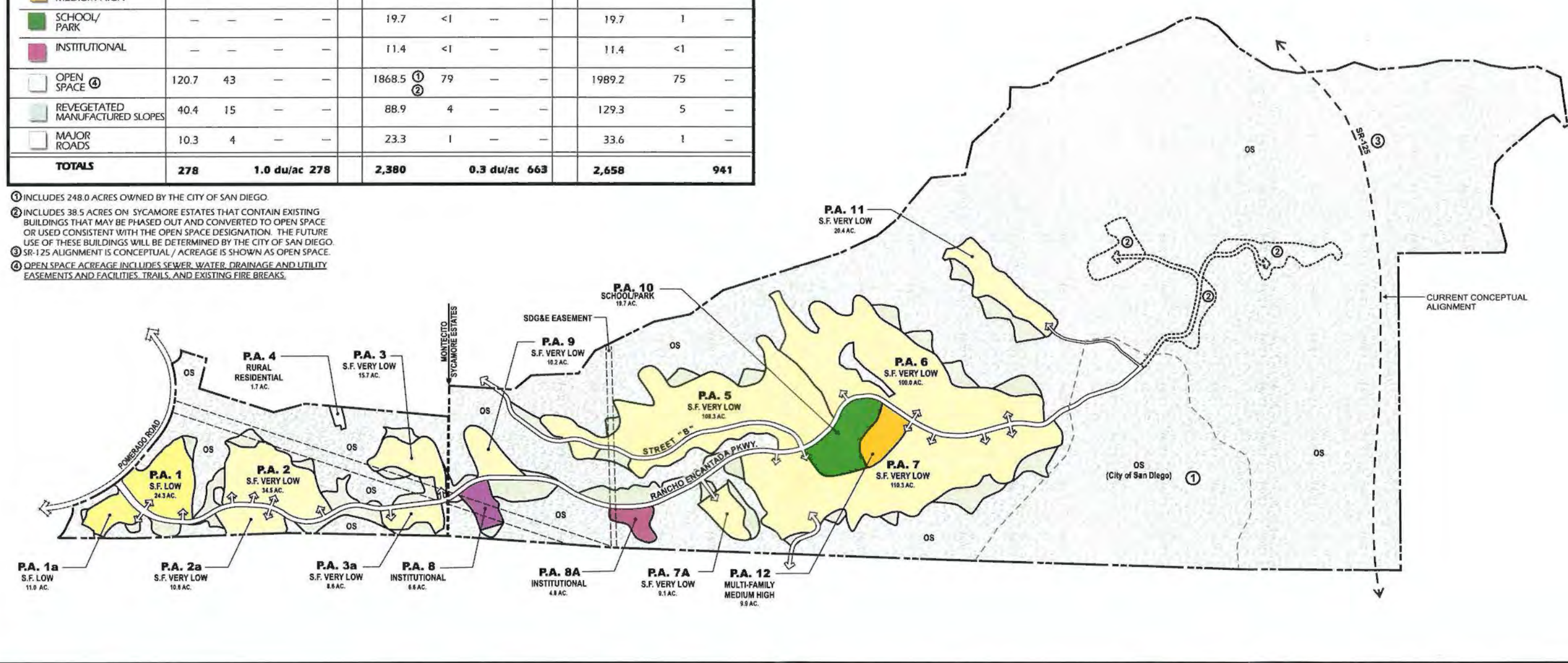
3.2.6 VEHICULAR CIRCULATION PLAN

Primary access to the individual planning areas of Montecito (Planning Areas 1 - 3) and Sycamore Estates (Planning Areas 5 - 12) is proposed to be provided by a new collector roadway, Rancho Encantada Parkway. As the primary east/west roadway within the *Rancho Encantada* Precise Plan,

LAND USE ABSTRACT

LAND USE	ACRES	(%)	DENSITY	Du's	ACRES	(%)	DENSITY	Du's	ACRES	(%)	Du's
RURAL RESIDENTIAL	1.7	<1	0-1 du/ac	—	—	—	—	—	1.7	<1	—
S.F. RESIDENTIAL VERY LOW	69.6	24	1-3 du/ac	—	358.3	15	1-3 du/ac	—	427.9	16	—
S.F. RESIDENTIAL LOW	35.3	13	3-5 du/ac	—	—	—	—	—	35.3	1	—
M.F. RESIDENTIAL MEDIUM HIGH	—	—	—	—	9.9	<1	15-29 du/ac	—	9.9	<1	—
SCHOOL/PARK	—	—	—	—	19.7	<1	—	—	19.7	1	—
INSTITUTIONAL	—	—	—	—	11.4	<1	—	—	11.4	<1	—
OPEN SPACE ④	120.7	43	—	—	1868.5 ① ②	79	—	—	1989.2	75	—
REVEGETATED MANUFACTURED SLOPES	40.4	15	—	—	88.9	4	—	—	129.3	5	—
MAJOR ROADS	10.3	4	—	—	23.3	1	—	—	33.6	1	—
TOTALS	278		1.0 du/ac	278	2,380		0.3 du/ac	663	2,658		941

- ① INCLUDES 248.0 ACRES OWNED BY THE CITY OF SAN DIEGO.
- ② INCLUDES 38.5 ACRES ON SYCAMORE ESTATES THAT CONTAIN EXISTING BUILDINGS THAT MAY BE PHASED OUT AND CONVERTED TO OPEN SPACE OR USED CONSISTENT WITH THE OPEN SPACE DESIGNATION. THE FUTURE USE OF THESE BUILDINGS WILL BE DETERMINED BY THE CITY OF SAN DIEGO.
- ③ SR-125 ALIGNMENT IS CONCEPTUAL / ACREAGE IS SHOWN AS OPEN SPACE.
- ④ OPEN SPACE ACREAGE INCLUDES SEWER, WATER, DRAINAGE AND UTILITY EASEMENTS AND FACILITIES, TRAILS, AND EXISTING FIRE BREAKS.



**Figure 3-1
PRECISE PLAN
LAND USE PLAN**

Rancho Encantada Parkway would be classified as a Residential Collector and would connect with Pomerado Road at the site's western boundary (see Figure 3-2, *Precise Plan Roadway Cross-Sections*). The Precise Plan notes that coordination must occur between the Montecito and Sycamore Estates sub-projects with regard to street alignment; roadway cross-sections including bicycle and pedestrian paths; grades and grading; design treatments; and traffic controls as appropriate. Both the Montecito and Sycamore Estates sub-projects would be developed with individual designs, such as paths and grading, under two separate, independent PRDs and VTMs.

The two sub-projects would be permitted to proceed independently of one another and the transportation improvements for each sub-project are not dependent on each other. If the Sycamore Estates sub-project develops prior to development of the Montecito sub-project, it may be necessary for the developers of Sycamore Estates to construct Rancho Encantada Parkway across the Montecito site to gain access. In this case, Montecito and Sycamore Estates would cooperate in granting necessary construction access and right-of-way easements. Additionally, the Sycamore Estates sub-project may take interim primary access from Beeler Canyon Road prior to the completion of Rancho Encantada Parkway.

Secondary access to the Project would be via Beeler Canyon Road by a residential collector street proposed through Planning Area 5. Other proposed internal public or private local roads would be constructed to the satisfaction of the City Engineer. Street design is required to conform to the City of San Diego Street Design Manual or to the satisfaction of the City Engineer and the City Fire Marshall. In the Sycamore Estates area of *Rancho Encantada*, the Precise Plan notes that it may be desirable to reflect a "rural" or "country" theme. In these areas, the Precise Plan suggests that it would be appropriate to develop using the City of San Diego Street Design Manual rural road standards or modified rural road standards. Gated entries on private streets would be limited to the smaller planning areas accessed from Rancho Encantada Parkway, provided conformance with Council Policy 600-42 (Limited and Controlled Access Development) is achieved. All public streets within the Rancho Encantada Precise Plan area would be conveyed to the City via easements, not in fee title.

The *Rancho Encantada* Precise Plan shows a conceptual alignment for State Route 125 (SR-125) (see Figure 3-1), as depicted in the City's Progress Guide and General Plan. Because the alignment is conceptual, no acreage has been assigned for its right-of-way. SR-125 is described within the City of San Diego General Plan as a Circulation Element Roadway, but is not described in the City of Poway or City of Santee General Plans or in the MCAS Miramar Master Plan. The Project is not proposing the alignment or construction of SR-125 nor is it proposing access to future SR-125.

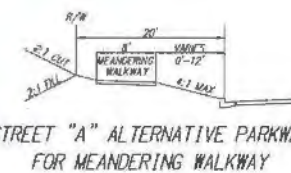
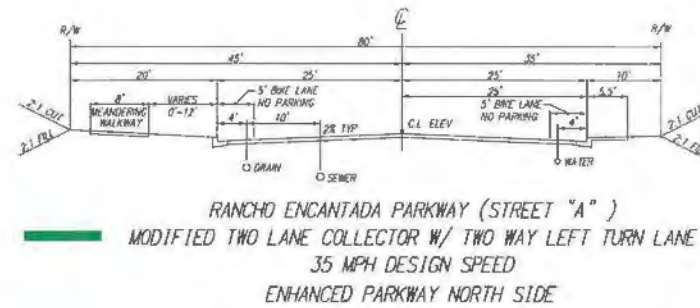
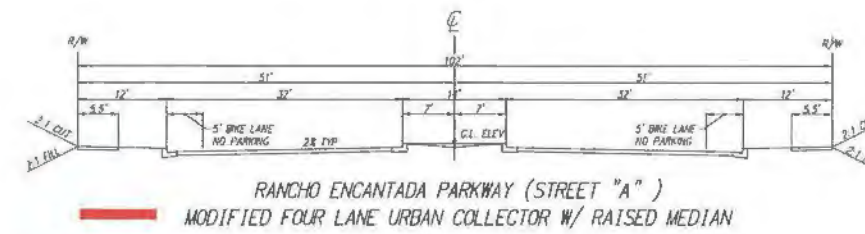
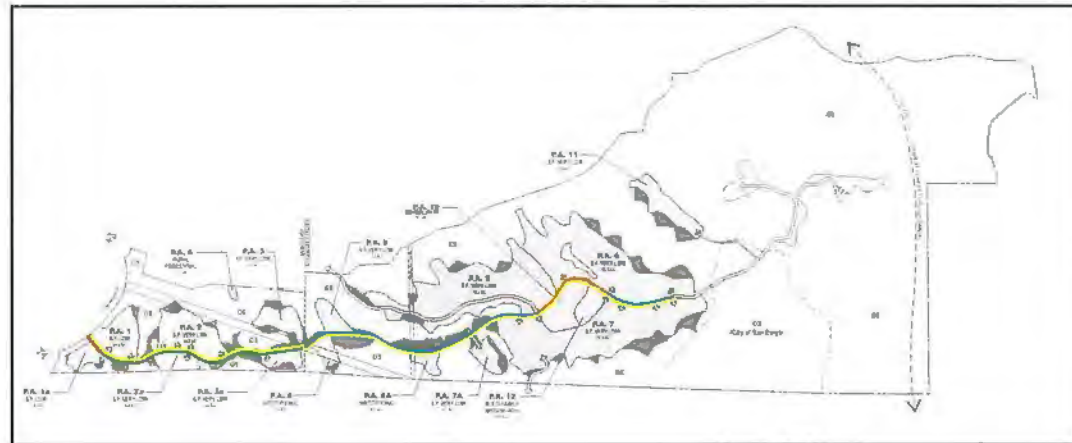
3.2.7 BICYCLE AND PEDESTRIAN CIRCULATION

Class II bicycle lanes in *Rancho Encantada* are proposed to follow Rancho Encantada Parkway. Bicycle travel on local residential streets would be accommodated by Class III bicycle routes, which consist of a shared right-of-way designated by signs only, with bicycle traffic sharing the roadway with motor vehicles. Pedestrian circulation within the Precise Plan area would be accommodated by sidewalks on local residential streets and by trails. A master trail system is proposed within the Precise Plan, as shown in Figure 3-3, *Precise Plan Master Trails Plan*. All public trail locations would be

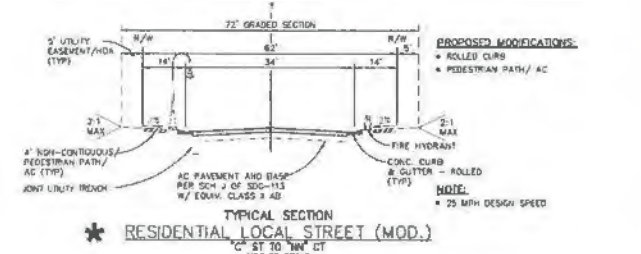
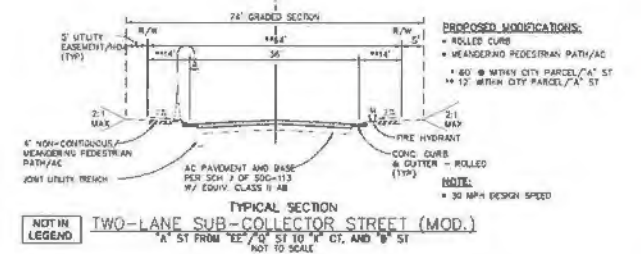
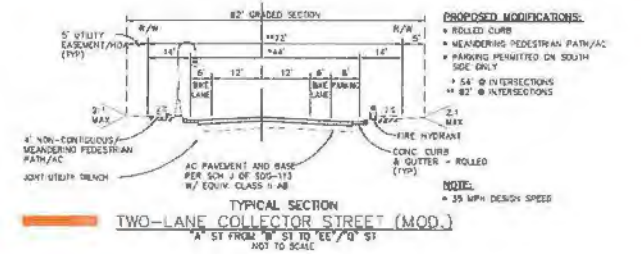
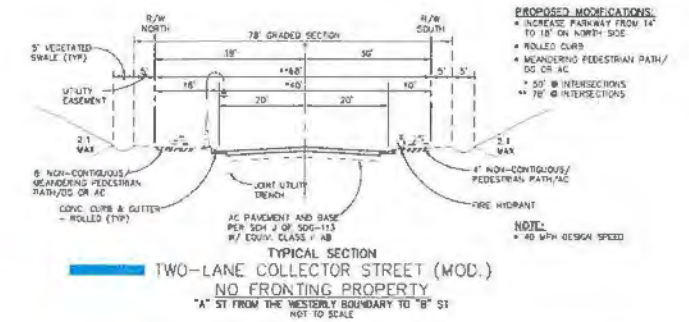
LEGEND

- RANCHO ENCANTADA PARKWAY WEST OF PA1 / PA1A ENTRIES
- RANCHO ENCANTADA PARKWAY FROM "B" ST. TO "EE/Q" ST.
- RANCHO ENCANTADA PARKWAY ALTERNATIVE PARKWAY
- RANCHO ENCANTADA PARKWAY FROM "E" STREET TO "U" STREET
- RANCHO ENCANTADA PARKWAY FROM RANCHO ENCANTADA / MONTECITO BOUNDARY TO "B" STREET
- 62' RURAL LOCAL ROAD (MODIFIED)

KEY MAP



MONTECITO



SYCAMORE ESTATES

not to scale

Figure 3-2
PRECISE PLAN
ROADWAY CROSS-SECTIONS

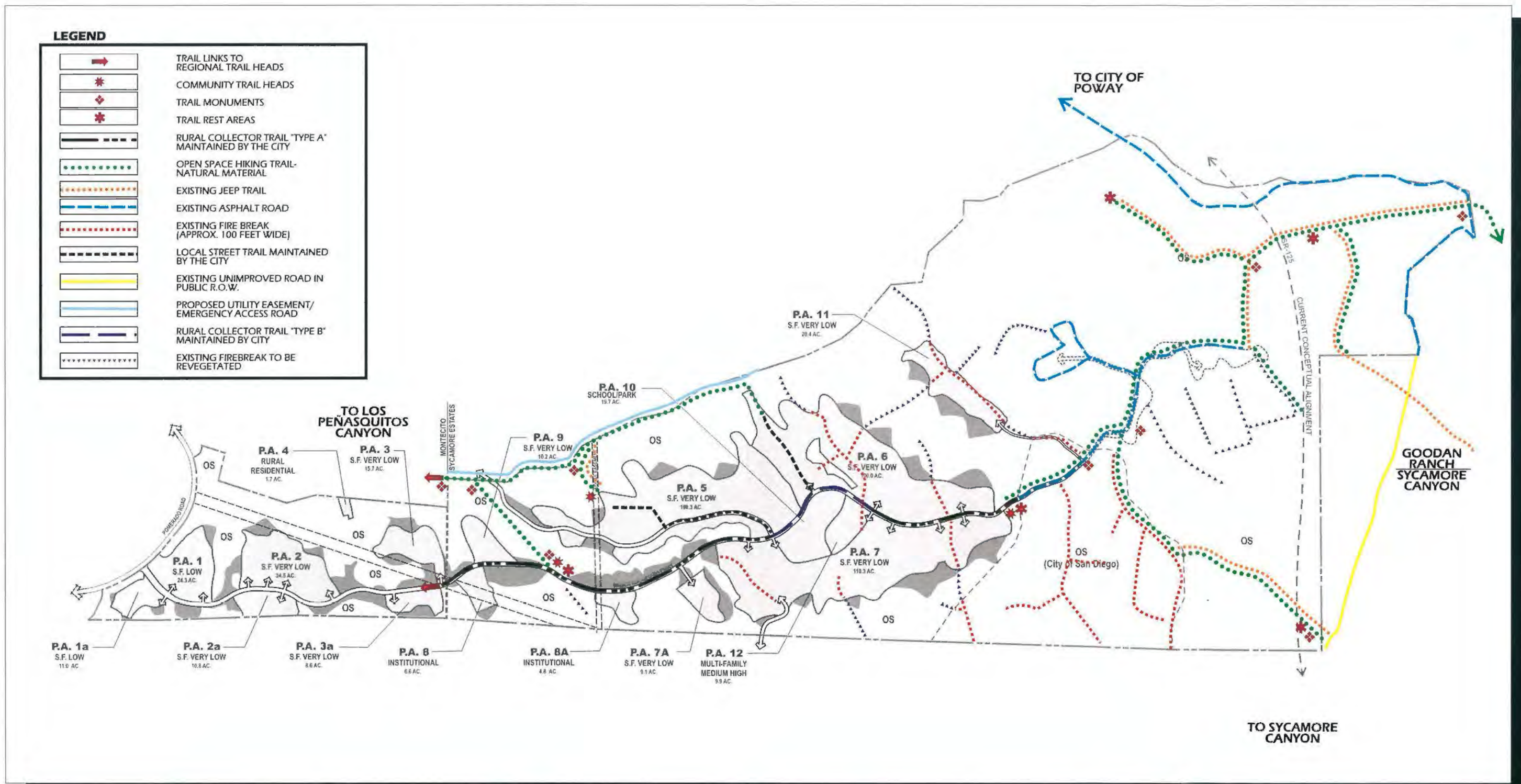
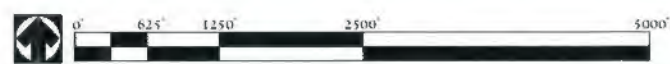


Figure 3-3
PRECISE PLAN
MASTER TRAILS PLAN



approved by the City of San Diego in compliance with the MSCP General Management Directives for trail design and maintenance.

3.2.8 CONCEPTUAL WATER, SEWER AND DRAINAGE PLANS

Conceptual water, sewer and drainage plans are described below for the overall Precise Plan area. It should be noted, however, that the Montecito and Sycamore Estates sub-projects, including infrastructure requirements, are designed to be independent from one another. The necessary water, sewer and drainage infrastructure attributable to each sub-project is defined on each of the sub-projects' VTMs, as described in Section 3.3.

Water Plan

Water would be supplied to the *Rancho Encantada* Precise Plan area by the City of San Diego. The on-site water system is proposed to consist of a network of pipelines, connecting pumping stations and an on-site water storage reservoir (see Figure 3-4, *Conceptual Water Plan*). Two pumping stations are proposed on the Sycamore Estates sub-project site and would boost flow to the different water service pressure zones located within the Precise Plan area. The water storage reservoir would be located on the Sycamore Estates sub-project site and would not be needed for independent development of the Montecito sub-project. Domestic water pipelines located within the Precise Plan area would consist of 12-inch, 10-inch and 8-inch diameter lines.

The pressure and flow requirements would allow the majority of pipelines to be 8-inches in size. Proposed pipe sizes and locations are shown in the sub-projects water studies (refer to Appendices I1 and I2). Within the Precise Plan area, most water lines would be located in Rancho Encantada Parkway and in other local residential roadways. Some water lines would be required through areas designated as MHPA open space. An easement would be required over water lines located in open space.

Sewer Plan

Sewer service would be provided by the Metropolitan Sewer System (METRO) which is owned by the City of San Diego. Within the Precise Plan area, most sewer lines would be located in local residential streets; however, sewer lines connecting development areas also may be required in areas designated as MHPA open space. Where sewer lines cross MHPA open space, access to sewer manholes would require a 20-foot easement and a 15-foot-wide all-weather maintenance road. Construction and maintenance of these roads would be designed in accordance with Section 1.4.2 "General Planning and Policies and Design Guidelines" of the MSCP Subarea Plan. Two options exist for the conveyance of on-site generated sewage, a lift station option and a gravity sewer option. Under either option, the Montecito sub-project would have interim sewer service via a connection from Beeler Canyon Road, and therefore could proceed with development independently of the Sycamore Estates sub-project. A gravity sewer line in Beeler Canyon Road would be installed from just north of Sycamore Estates' proposed Planning Area 11 to the westerly end of Beeler Canyon Road. At that point, the

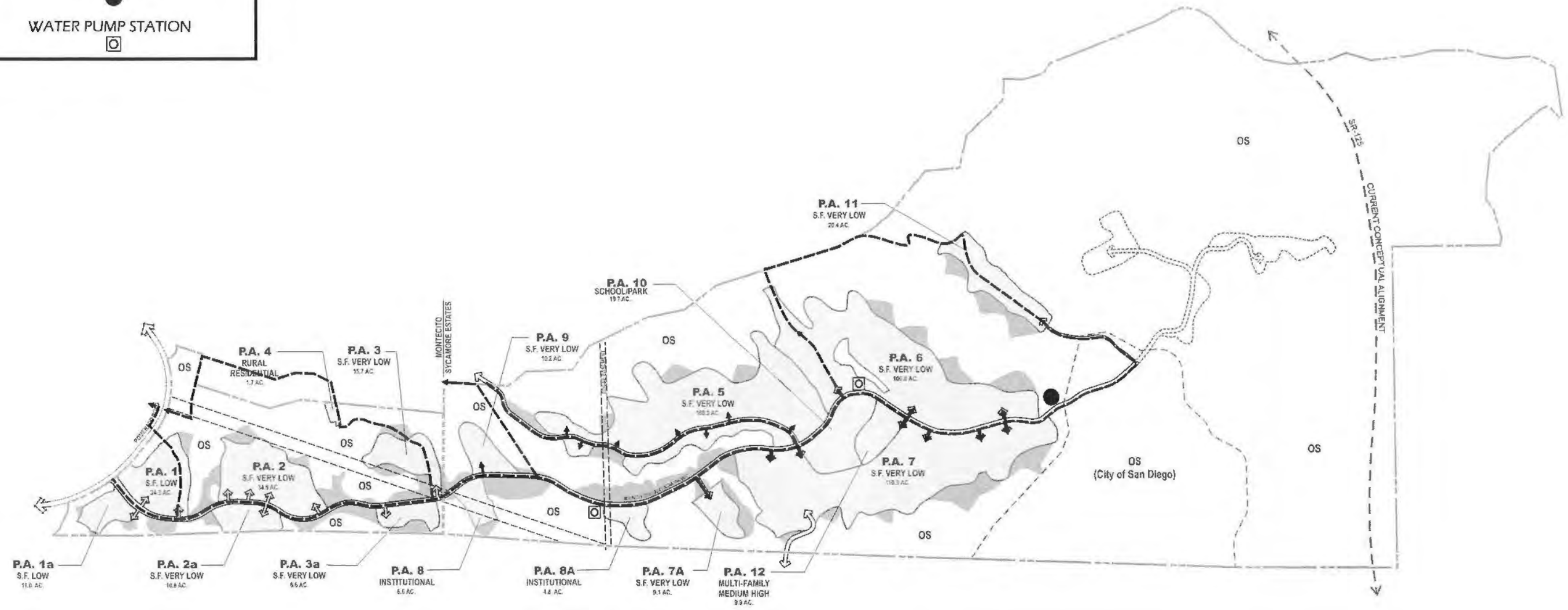
sewer system would either be pumped by a proposed public sewer lift station to a sewer main in Pomerado Road, or would continue as a gravity system to the north. These two design options are described below.

Lift Station Option: Lift stations are required where it is necessary to pump wastewater uphill when the facility being served lies at a lower elevation than the adjacent main line. Under this design option, a sewer lift station would be constructed on an approximate one-acre site in the northwestern portion of the Montecito sub-project site and would be designed to the standards of the Metropolitan Waste Water District and the City of San Diego. If development of the Sycamore Estates sub-project preceded development of the Montecito sub-project, construction of the sewer lift station on the Montecito sub-project site would be an off-site requirement of Sycamore Estates. Under this option, the existing sewer main in Pomerado Road would be extended southward approximately 1,200 feet to intercept the lifted flow. The approximate location of on-site wastewater collection lines and the sewer pump station are shown in Figure 3-5, *Conceptual Sewer Plan with Pump Station Option*. More precise locations of on-site sewer lines are shown in the sub-projects' sewer studies (refer to Appendices J1 and J2).

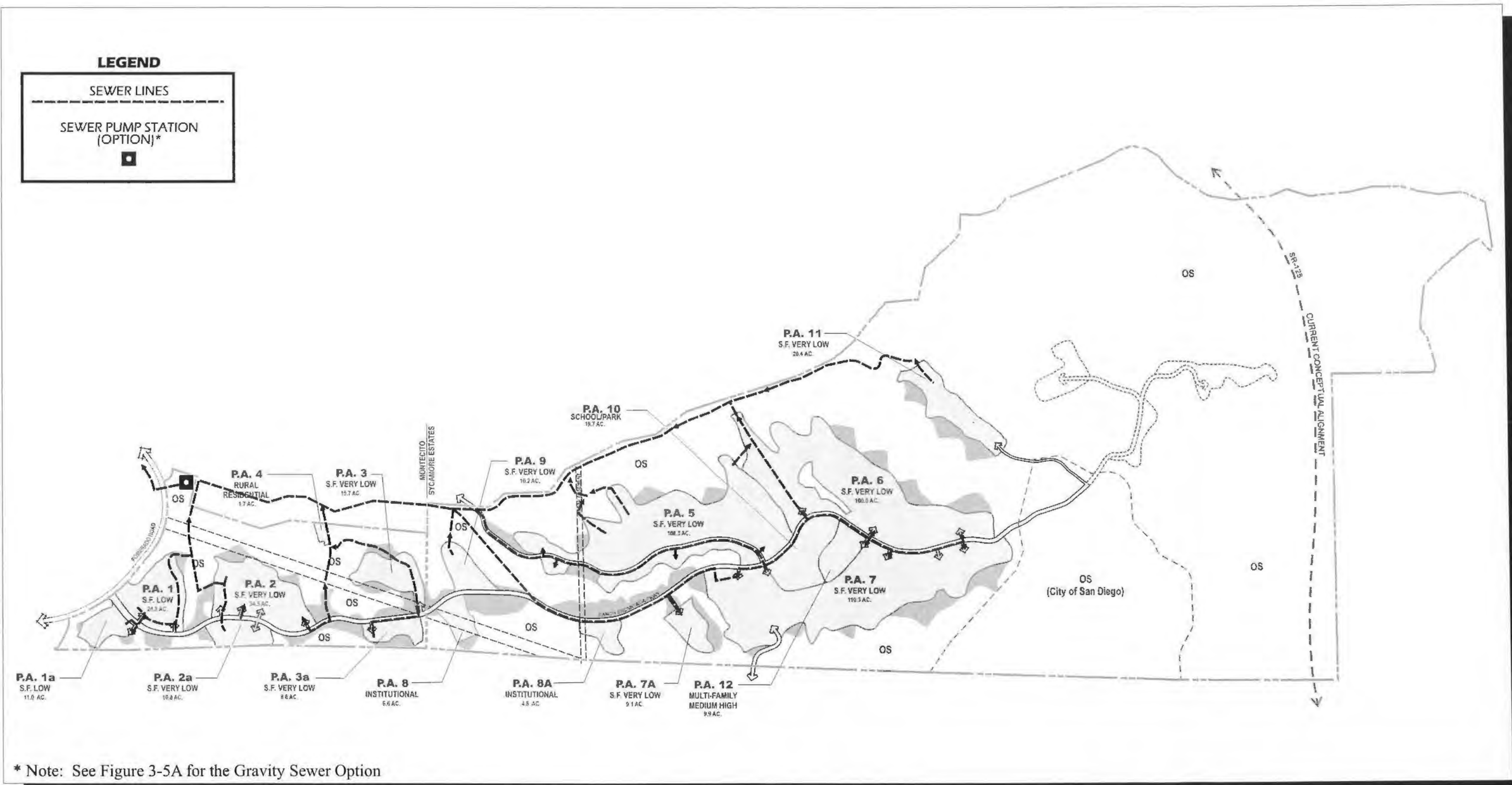
Gravity Sewer Option: As a design option of the proposed Project, a gravity sewer system is proposed in lieu of constructing a lift station on the Montecito sub-project site. Improvements that would be necessary for the gravity sewer system are shown on Figure 3-5A, *Off-Site Gravity Sewer Design Option*. Except for the proposed pump station, on-site improvements would be the same as those shown in Figure 3-5. As shown in Figure 3-5A, off-site gravity sewer improvements would be necessary starting at the intersection of Beeler Canyon Road and Creek Road. At this point, a new sewer line would be installed to follow Creek Road northwest for approximately 2,120 feet, at which point it would enter private property for approximately 1,100 feet. At the intersection of Pomerado Road and Scripps Poway Parkway, the new line would cross an existing sewer line. The elevation difference between the two lines would be 40 feet at this point, precluding the possibility of connecting into the existing system at this location. The new sewer line would then continue northwest through private property for an additional 920 feet, reaching Stage Stop Road, which it would follow for approximately 1,200 feet. At this point, the new line would reach Old Pomerado Road and follow it north for approximately 3,040 feet and meet again with the existing sewer system on Pomerado Road. There is an elevation difference of approximately 7 feet at this intersection, therefore, the proposed sewer line would need to be extended an additional 1,500 feet along Pomerado Road. At the intersection of Pomerado Road and Oak Knoll Road, the proposed sewer line would be connected with the existing sewer system. The entire length of the off-site gravity sewer would be approximately 9,880 feet from the start at Beeler Canyon Road to the final connection with the existing Poway sewer system at Oak Knoll Road. Generally, the typical disturbance area for the installation or improvement of sewer lines is eight to ten inches wider than the pipe diameter. A 20-foot-wide total disturbance area is assumed for the evaluation impacts along the off-site gravity sewer alignment. New gravity sewer lines would be located in either existing roadway rights-of-way, or would be placed in easements.

LEGEND

- WATER LINES
- WATER RESERVOIR
- WATER PUMP STATION



**Figure 3-4
PRECISE PLAN
CONCEPTUAL WATER PLAN**



**Figure 3-5
PRECISE PLAN
CONCEPTUAL SEWER PLAN
WITH PUMP STATION OPTION**





LEGEND
GRAVITY SEWER ALIGNMENT



Figure 3-5A
OFF-SITE GRAVITY SEWER DESIGN OPTION

□ Drainage Plan

As shown on Figure 3-6, *Conceptual Drainage Plan*, most on-site storm drains are proposed to be installed in the various local street rights-of-way to handle the anticipated runoff from development areas. Storm drain inlets and outlets would be extended into open space, subject to MHPA requirements, to collect or deposit runoff in natural drainage courses. Storm drains connecting development areas also would extend across open space areas. Storm drain runoff would be collected in standard inlet facilities and conveyed by pipes principally located in streets and generally paralleling the sewer system. Detention basins, desilting basins, and associated drainage facilities such as pipelines are permitted uses in all areas designated as residential or open space. The locations of necessary detention basins, desilting basins and water quality basins are shown on the sub-project's VTMs (see Section 3.3). A discussion of Best Management Practices (BMPs) in relation to drainage is included in Section 4.5, HYDROLOGY/WATER QUALITY.

3.3 VESTING TENTATIVE MAPS & PLANNED RESIDENTIAL DEVELOPMENT PERMITS

VTMs and PRD Permits are proposed for the independent Montecito and Sycamore Estates sub-projects, as described below. The Montecito and Sycamore Estates VTMs and PRDs are independent of one another and either sub-project could be developed regardless if the other sub-project is developed. The two sub-projects are not proposing a phase shift per the city's Managed Growth Initiative, but instead propose development in accordance with Council Policy 600-29 (refer to Issue No. 3 in Section 4.1, LAND USE).

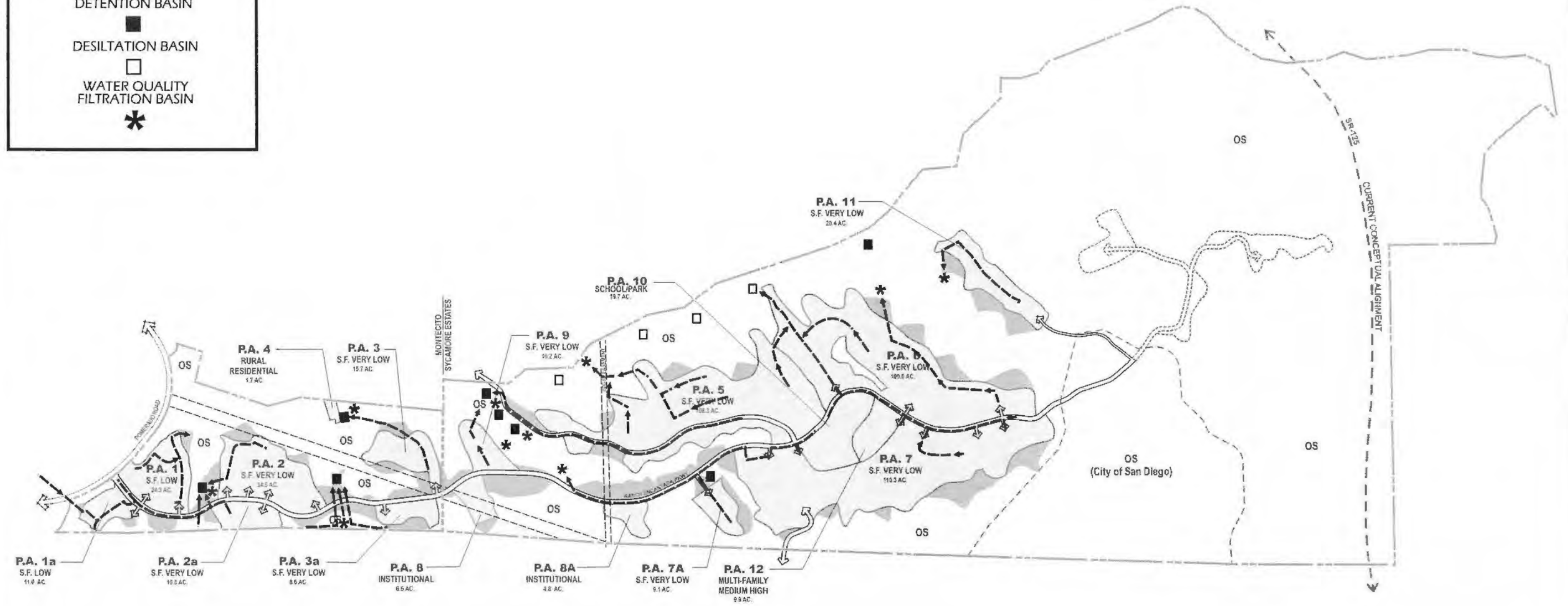
3.3.1 MONTECITO SUB-PROJECT VESTING TENTATIVE MAP

The proposed *Montecito VTM* is shown on Figure 3-7. A total of 317 lots would be created by the VTM. Development of the sub-project would encompass 277 single-family lots (Lots 1 - 277) plus one lot to accommodate an existing on-site residence. In addition, 38 open space lots and one lot reserved for a sewer pump station would be created. The VTM depicts the location of each lot and the alignments of Rancho Encantada Parkway and all internal roadways and easements. Off-site improvements are proposed west of the site, including improvements to the Pomerado Road/Rancho Encantada Parkway intersection. A traffic signal would be placed at the intersection of Pomerado Road and proposed Rancho Encantada Parkway. Off-site transportation improvements required of the sub-project are described in Section 4.6, TRANSPORTATION.

Grading is proposed on approximately 153 acres, including all utility improvements and detention basins. Implementation of the proposed VTM would result in a balanced grading operation of approximately 3.6 million cubic yards of cut and 3.6 million cubic yards of fill. Limited amounts of import or export may be necessary based on final engineering of the site. Several manufactured slopes would be created along the development area boundaries. These slopes would range in height from approximately 100 to 130 feet. A more detailed description of the sub-project's grading plan is included in Section 4.2, LANDFORM ALTERATION AND VISUAL QUALITY.

LEGEND

- STORM DRAINS
- DETENTION BASIN
- DESILTATION BASIN
- WATER QUALITY FILTRATION BASIN



**Figure 3-6
PRECISE PLAN
CONCEPTUAL DRAINAGE PLAN**

The VTM proposes circulation improvements and water, sewer, and drainage facilities to serve the Montecito sub-project. Proposed circulation improvements include the construction of the western portion of Rancho Encantada Parkway and all internal access roads. In addition, an emergency access road is planned to extend from the northern portion of Planning Area 3 to Beeler Canyon Road. Water and sewer transmission lines would generally be constructed within the project's roadway system, although some lines would be required through open space. A sewer pump station is proposed in the northwestern portion of the sub-project site if the pump station option is implemented as described above in Section 3.2.8. Stormwater drainage would be directed to several on-site outlets and three detention basins, with each detention basin having a corresponding water quality filtration basin.

3.3.2 MONTECITO SUB-PROJECT PLANNED RESIDENTIAL DEVELOPMENT PERMIT

Montecito PRD Site Plan

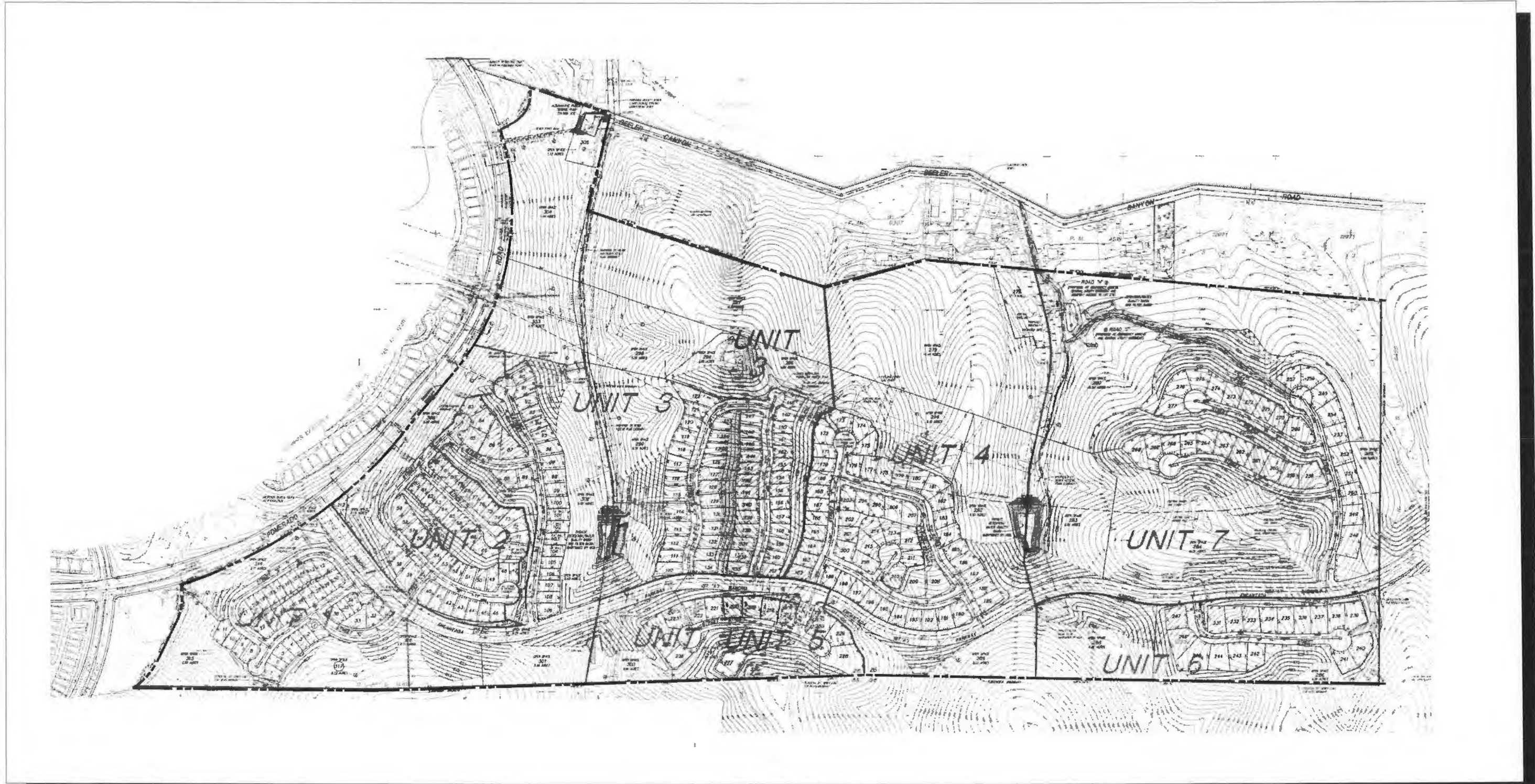
The residential areas of the Montecito sub-project are proposed to be developed as a PRD, as specified in San Diego Municipal Code §101.0901. The Montecito PRD proposes 278 single-family lots that includes retaining one existing single-family unit in its existing location, and preserves the northerly portions of the property as open space as part of the City's MHPA. There are 38 lots that are designated as open space by the Montecito PRD. The proposed *Montecito PRD Site Plan* is illustrated on Figure 3-8. As shown by this exhibit, the PRD is designed to accommodate single-family housing sites. The Montecito PRD proposes 81 lots having a minimum lot size of 5,000 square feet, 80 lots having a minimum lot size of 6,000 square feet, 55 lots having a minimum lot size of 7,000 square feet and 61 lots having a minimum lot size of 9,600 square feet. An existing single-family residence is located in the north-central portion of the Montecito sub-project site that would be retained.

PRD Design Guidelines and Development Standards are proposed that would serve as the primary guideline for the development of the single-family residential areas of Montecito. The guidelines call for establishment of a variety of architectural themes. Illustrative architectural styles, or a combination thereof, could be selected for the site and applied.

Montecito PRD Landscape Concept Plan/Brush Management Plan

A Landscape Concept Plan is proposed as part of the Montecito PRD, as shown in Figure 3-9, *Montecito PRD Conceptual Landscape Plan*. As shown, streetscape landscaping is proposed along Rancho Encantada Parkway and along all internal project roads. Streetscape landscaping is proposed to consist of a combination of street trees, shrubs, and groundcover. Throughout Montecito, Rancho Encantada Parkway would include a 20-foot-wide landscaped parkway, including a 5½-foot-wide landscape area adjacent to the curb and 5½-foot-wide noncontiguous sidewalk. Manufactured slopes are proposed to be landscaped with native or naturalized plant material.

A Brush Management Program is required by Section 6 of the City of San Diego Landscape Technical Manual and Appendix IIA of the Uniform Fire Code to reduce the risk of wildfire while minimizing visual, biological, and erosion impacts to natural areas. Brush management is required along all development boundaries where structures would be located adjacent to natural open space. In these



SOURCE: NOLTE ASSOCIATES

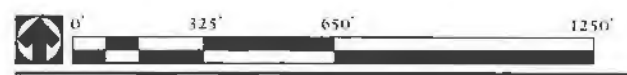









Figure 3-7
MONTECITO VTM



Figure 3-8
MONTECITO
PRD SITE PLAN



CONCEPTUAL PLANT PALETTE

- TREES**
-  Community Entry Node
 -  Primary Streetscape (Rancho Encantada Parkway)
 -  Internal Streetscape Trees (Streets A - Z)
- SHRUBS/GROUNDCOVER**
-  Transitional Areas (if steeply Manufactured Slopes Adjacent to Natural Open Space)
 -  Ornamental Slope Areas (Slopes Between Lots & Adjacent to portions of Rancho Encantada Parkway)
 -  Community Entry Nodes
 -  Primary Streetscape / Internal Streetscape

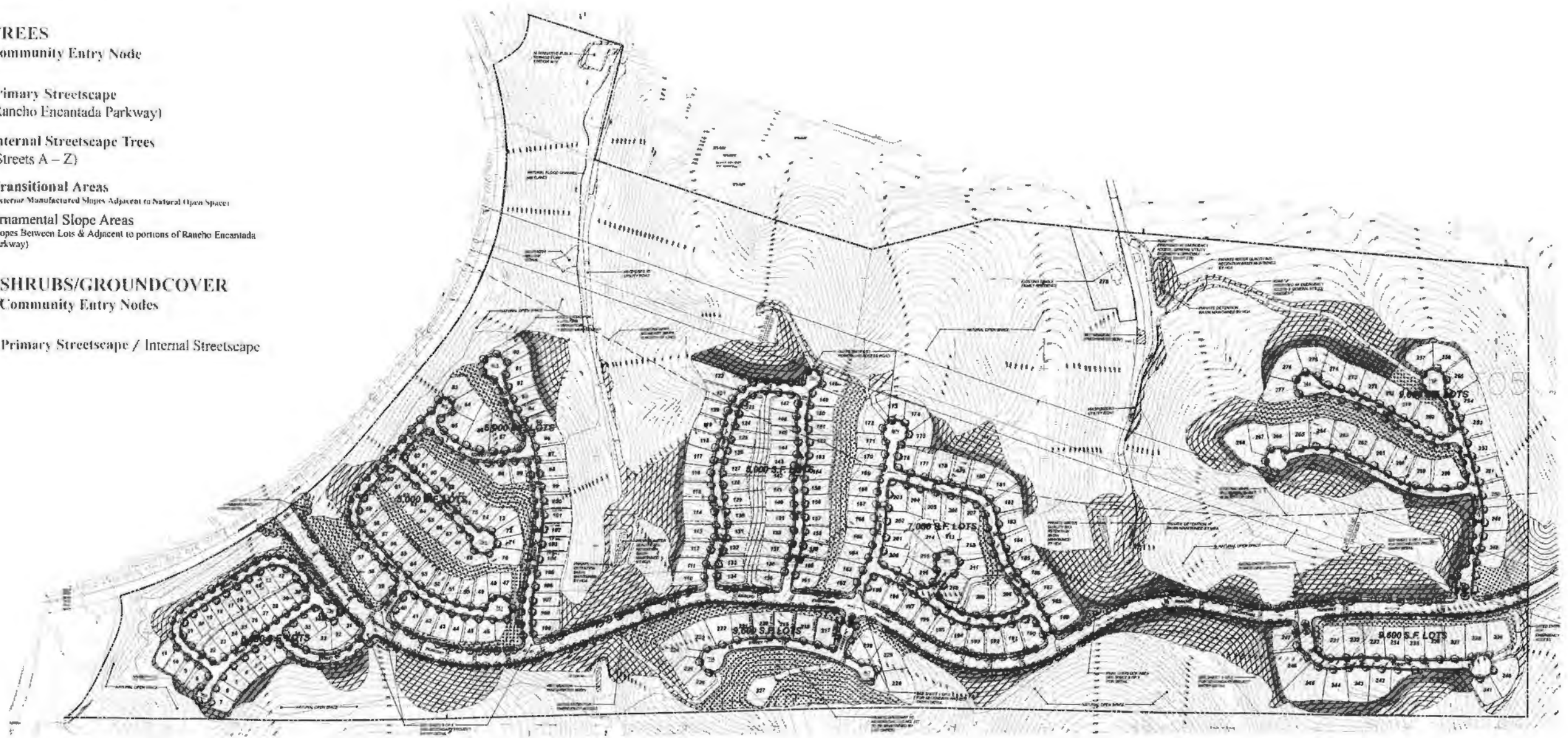
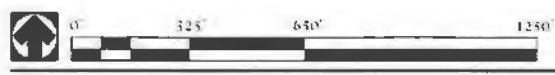


Figure 3-9
MONTECITO PRD
CONCEPTUAL LANDSCAPE PLAN



LEGEND

-  ZONE 1 - Ornamental Landscapes or Brush Clearance
-  ZONE 2 - Low Volume Plantings or Selective Thinning
-  NO BRUSH MANAGEMENT REQUIRED
-  TRANSITIONAL AREAS - See Figure 3-9

BRUSH MANAGEMENT ZONE WIDTH REQUIREMENTS

Zone 1	30'	35'	40'	45'	50'	55'	60'
Zone 2	40'	50'	40'	30'	20'	10'	0'
	70'	85'	80'	75'	70'	65'	60'

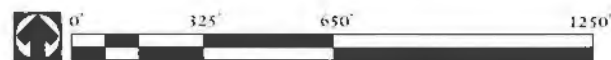
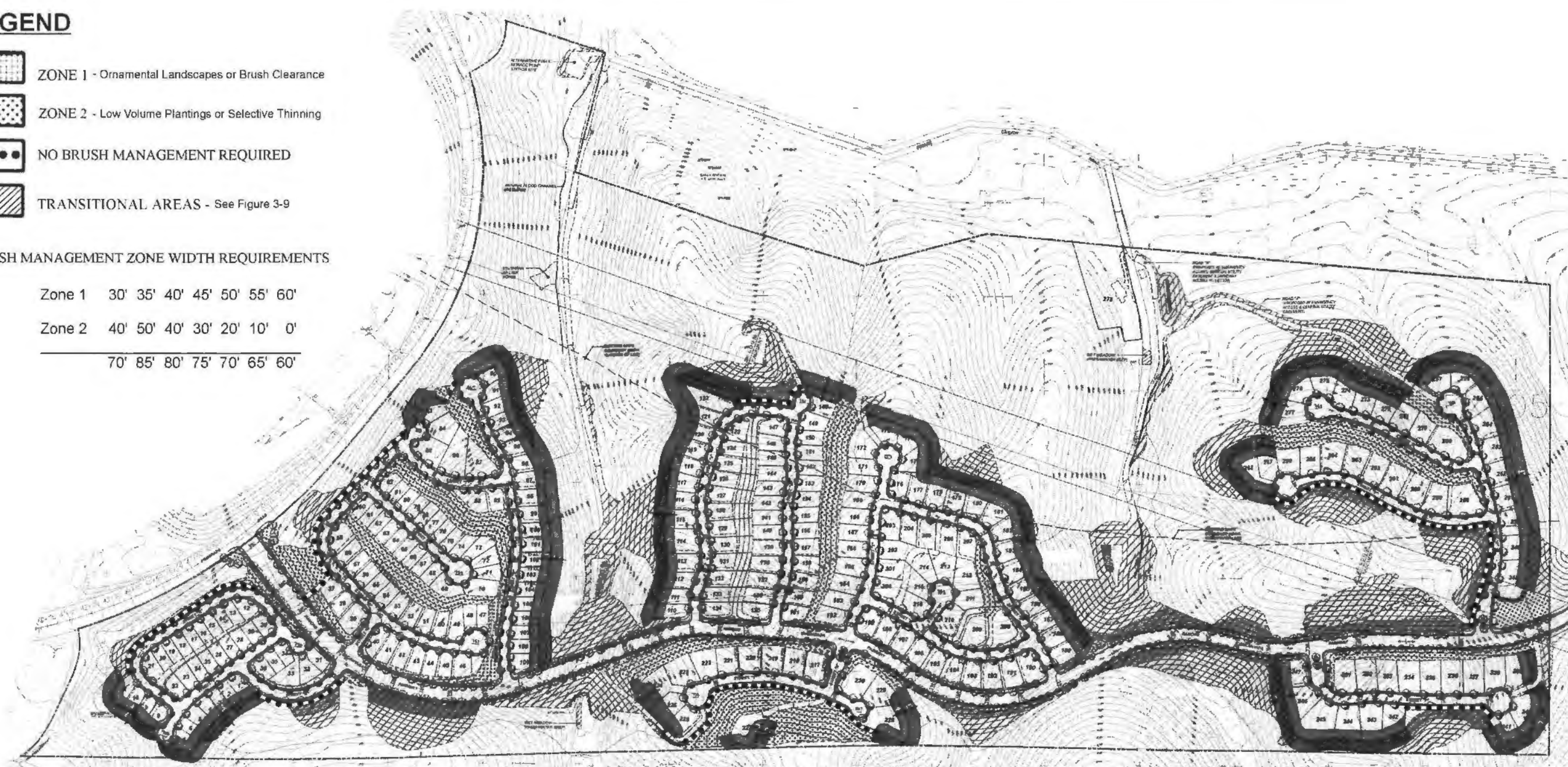


Figure 3-10
MONTECITO PRD
BRUSH MANAGEMENT PLAN

areas, a combination of two brush management zones are required. Zone 1 would consist of hardscape or permanently irrigated vegetation and would be accommodated on the development pads and outside of the MHPA. Zone 2 would consist of the selective thinning and pruning of the native plants. Vegetation clearing would be conducted consistent with City standards to avoid/minimize impacts to sensitive species to the maximum extent possible. Regardless of ownership, brush management in Zone 2 would be the responsibility of a property owners association or another private party. Brush management Zone 2 is a permitted use in MHPA open space. Figure 3-10, *Montecito PRD Brush Management Program*, depicts the proposed brush management program for the sub-project.

3.3.3 SYCAMORE ESTATES SUB-PROJECT VESTING TENTATIVE MAP

The proposed *Sycamore Estates VTM* is shown on Figure 3-11. A total of 631 lots would be created by the VTM. Development of the sub-project would encompass 557 single-family units, one affordable housing lot, one school lot, one public park lot, one lot reserved for a proposed water storage reservoir, two lots designated for water pump stations, two lots for institutional uses, and one lot that represents existing industrial uses areas that are proposed to be phased-out as part of the sub-project conveyed to the City of San Diego. In addition, 32 homeowners association open space lots are proposed as well as two MHPA open space lots. The VTM depicts the location of each lot and the alignments of Rancho Encantada Parkway, Street "B" that would connect to Beeler Canyon Road, and all other internal roadways and easements. If the Sycamore Estates sub-project develops prior to development of the Montecito sub-project, it may be necessary for the developers of Sycamore Estates to construct Rancho Encantada Parkway across the Montecito sub-project site to gain access. In this case, the construction of Rancho Encantada Parkway across the Montecito sub-project site and related improvements to the Pomerado Road/Rancho Encantada Parkway intersection are regarded as off-site improvements of the Sycamore Estates VTM.

The VTM has been designed to comply with the grading concept proposed in the *Rancho Encantada Precise Plan*. Grading is proposed on approximately 540 acres of the Sycamore Estates sub-project site, including all utility improvements and detention basins; however, this EIR analyzes a 590-acre maximum disturbance area to take into account potential construction impacts. Implementation of the proposed VTM would result in approximately 14.9 million cubic yards of cut and 14.9 million cubic yards of fill, with a net of zero cubic yards of import or export. Limited amounts of import or export may be necessary based on final engineering of the site. Several manufactured slopes would be created along the sub-project's development area boundaries. These slopes would range in height from approximately 70 to 205 feet in height. The proposed exterior manufactured slopes would be representative of natural slope heights of the sub-project site's existing topography. A more detailed description of the sub-project's grading plan is included in Section 4.2, LANDFORM ALTERATION AND VISUAL QUALITY.

The VTM proposes circulation improvements and water, sewer, and drainage facilities to serve the Sycamore Estates sub-project. Proposed circulation improvements include the construction of the eastern segment of Rancho Encantada Parkway, secondary access for the *Rancho Encantada Precise Plan* through Street "B," and all internal access roads. Water and sewer transmission lines would generally be constructed within the project's roadway system, although some lines would be required through open space. A water storage reservoir is proposed in Lot 560 and two water pump stations

are proposed in Lots 561 and 562. Off-site sewer improvements are proposed in Beeler Canyon Road, and if the Sycamore Estates sub-project precedes development of the Montecito sub-project, construction of the sewer pump station on the Montecito sub-project site would be required as an off-site improvement of the Sycamore Estates VTM if the pump station option is selected, as discussed above in Section 2.2.8. Stormwater drainage would be directed to several proposed outlets and three detention basin locations.

3.3.4 SYCAMORE ESTATES SUB-PROJECT PLANNED RESIDENTIAL DEVELOPMENT PERMIT

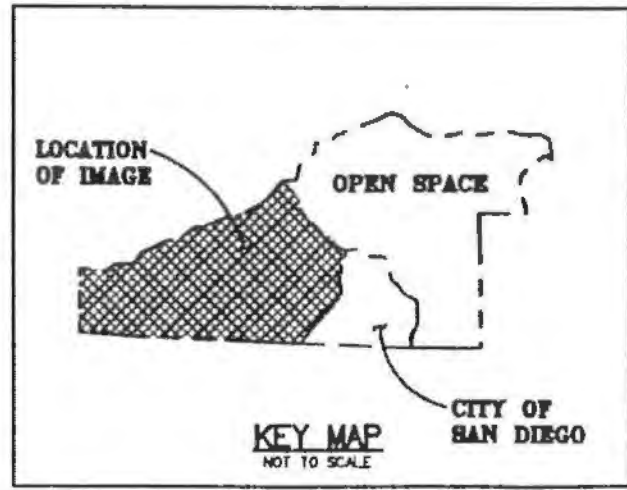
Sycamore Estates PRD Site Plan

The residential areas of Sycamore Estates are proposed to be developed as a PRD. The proposed Sycamore Estates PRD consists of two components: a single-family development plan and an affordable housing development plan. The Sycamore Estates single-family PRD proposes 557 single-family lots and a school/park lot in the northerly and westerly portions of the site, while preserving the remainder of the site as open space (see Figure 3-12, *Sycamore Estates PRD*). Of the 557 single-family residential lots, 284 lots are proposed to have a minimum lot size of 9,600 square feet and 273 lots are proposed to have a minimum lot size of 12,000 square feet. Architecture plans are proposed for the single-family lots, with homes (including garage) ranging from approximately 3,800 square feet to 6,400 square feet in size.

A 9.9-acre affordable housing site is proposed within Sycamore Estates to accommodate below market rate housing units. Figure 3-13, *Affordable Housing Site Plan*, illustrates the proposed building arrangement, parking layout, and recreation amenities. As shown, several buildings are proposed, accommodating 106 multi-family units. Primary access to the affordable housing site would be provided via Rancho Encantada Parkway. Internal private driveway isles would be constructed at widths adequate for emergency vehicle access. The proposed multi-family structures would consist of a combination of two- and three-story elements. Parking and recreational facilities would be provided on-site.

Sycamore Estates PRD Landscape Concept Plan/Brush Management Plan

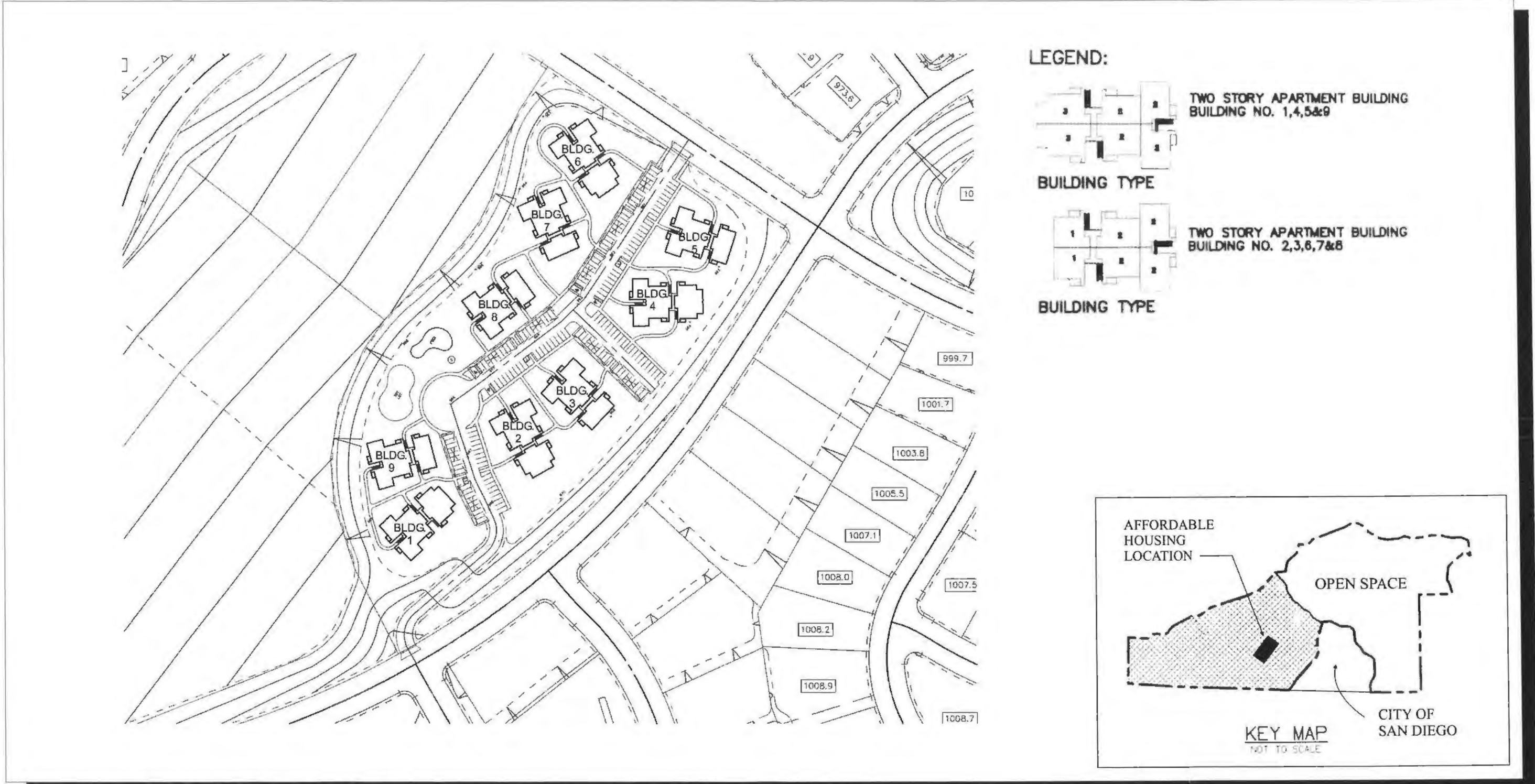
A Landscape Concept Plan is proposed as part of the Sycamore Estates PRD, as shown in Figure 3-14, *Sycamore Estates PRD Conceptual Landscape Plan*. As shown, streetscape landscaping is proposed along Rancho Encantada Parkway, and along all internal project roads. Streetscape landscaping is proposed to consist of a combination of street trees, shrubs, and groundcover. Per the City's Landscape Technical Manual, manufactured slopes would be landscaped with native and non-native vegetation. The Tyson method of revegetation of manufactured slopes within the Sycamore Estates sub-project, using "ground up" native vegetation from the site, may be used. An illustration of the landscape concept proposed for the affordable housing site is shown in Figure 3-15, *Affordable Housing Site Conceptual Landscape Plan*. The existing fire breaks in the western portion of the Sycamore Estates sub-project site not being used for trails, would be revegetated with native species, as shown on Figure 3-14.



SOURCE: ROBERT BEIN, WILLIAM FROST & ASSOCIATES

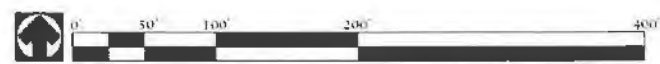


Figure 3-11
SYCAMORE ESTATES VTM



SOURCE: ROBERT BEIN, WILLIAM FROST & ASSOCIATES

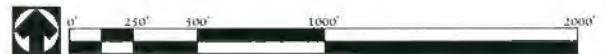
Figure 3-13
SYCAMORE ESTATES
AFFORDABLE HOUSING SITE PLAN





SOURCE: VAN DYKE PARTNERSHIP

Figure 3-14
SYCAMORE ESTATES
PRD CONCEPTUAL LANDSCAPE PLAN

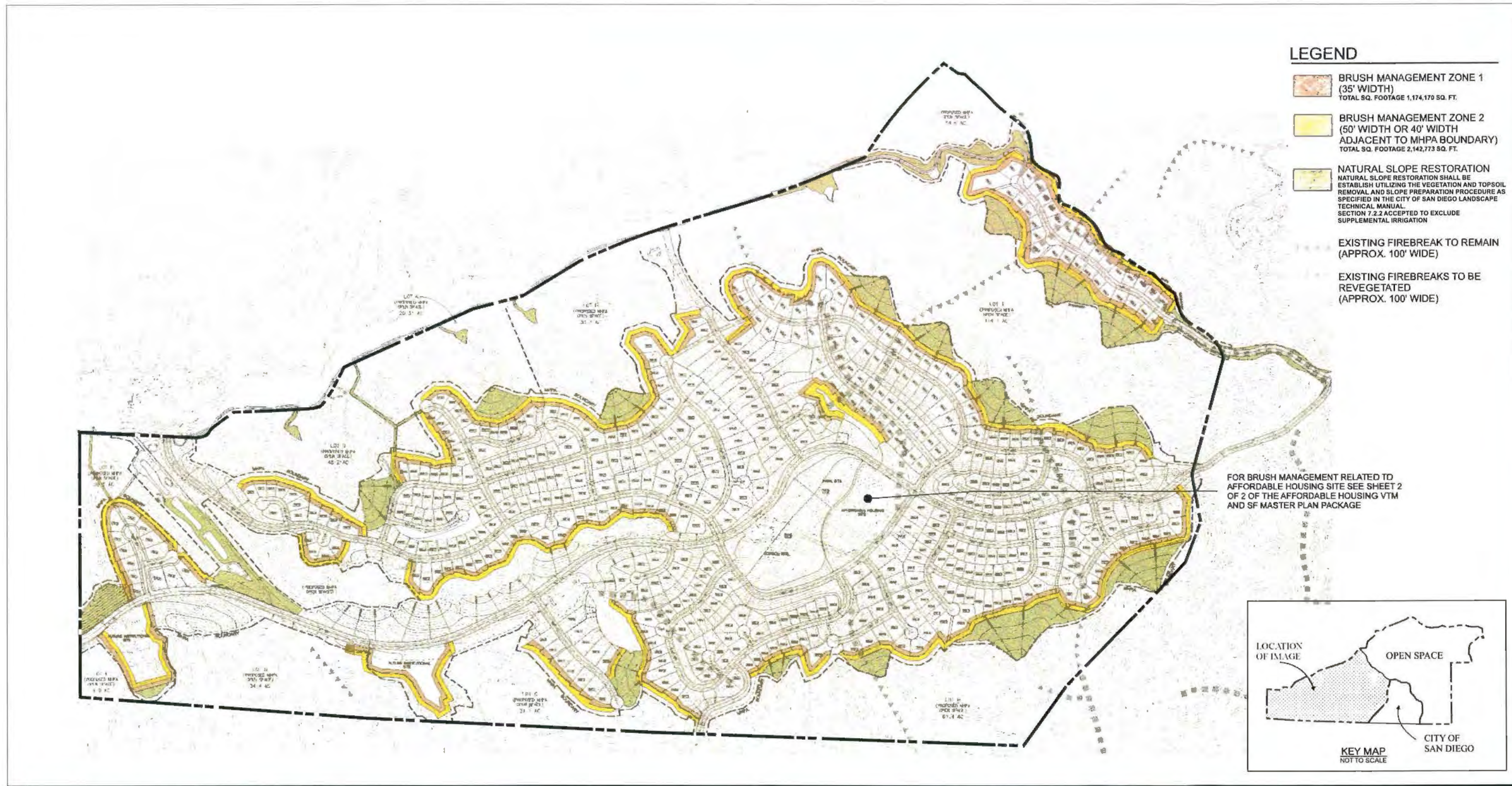




SOURCE: VAN DYKE PARTNERSHIP

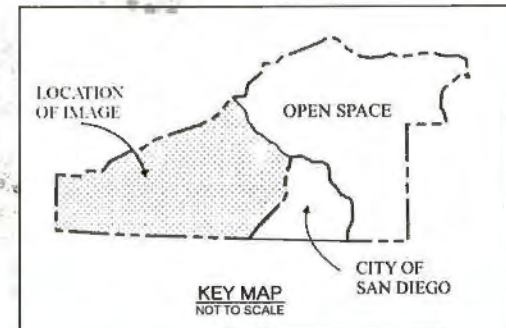
Figure 3-15
SYCAMORE ESTATES
AFFORDABLE HOUSING SITE
CONCEPTUAL LANDSCAPE PLAN





- LEGEND**
- BRUSH MANAGEMENT ZONE 1 (35' WIDTH)
TOTAL SQ. FOOTAGE 1,174,170 SQ. FT.
 - BRUSH MANAGEMENT ZONE 2 (50' WIDTH OR 40' WIDTH ADJACENT TO MHPA BOUNDARY)
TOTAL SQ. FOOTAGE 2,142,773 SQ. FT.
 - NATURAL SLOPE RESTORATION
NATURAL SLOPE RESTORATION SHALL BE ESTABLISH UTILIZING THE VEGETATION AND TOPSOIL REMOVAL AND SLOPE PREPARATION PROCEDURE AS SPECIFIED IN THE CITY OF SAN DIEGO LANDSCAPE TECHNICAL MANUAL SECTION 7.2.2 ACCEPTED TO EXCLUDE SUPPLEMENTAL IRRIGATION
 - EXISTING FIREBREAK TO REMAIN (APPROX. 100' WIDE)
 - - - EXISTING FIREBREAKS TO BE REVEGETATED (APPROX. 100' WIDE)

FOR BRUSH MANAGEMENT RELATED TO AFFORDABLE HOUSING SITE SEE SHEET 2 OF 2 OF THE AFFORDABLE HOUSING VTM AND SF MASTER PLAN PACKAGE



SOURCE: ROBERT BEIN, WILLIAM FROST & ASSOCIATES

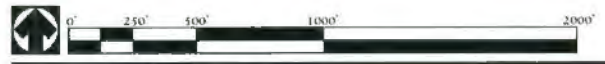


Figure 3-16
SYCAMORE ESTATES
PRD BRUSH MANAGEMENT PLAN

A Brush Management Program is required by Section 6 of the City of San Diego Landscape Technical Manual and Appendix IIA of the Uniform Fire Code to reduce the risk of wildfire while minimizing visual, biological, and erosion impacts to natural areas. Figure 3-16, *Sycamore Estates PRD Brush Management Program*, depicts the proposed brush management program for the Sycamore Estates sub-project. Brush management is required along all development boundaries where structures would be located adjacent to natural open space. In these areas, a combination of two brush management zones are required. Zone 1 would consist of hardscape or permanently irrigated vegetation and would be accommodated on the development pads and outside of the MHPA. Zone 2 would consist of the selective thinning and pruning of the native plants. Vegetation clearing would be conducted consistent with City standards to avoid/minimize impacts to sensitive species to the maximum extent possible. Regardless of ownership, brush management in Zone 2 would be the responsibility of a property owners association or another private party. Brush management Zone 2 is a permitted use in MHPA open space.

3.4 RESOURCE PROTECTION ORDINANCE

The City of San Diego regulates development of environmentally sensitive lands through the Resource Protection Ordinance (RPO). RPO applies to wetlands, wetland buffers, floodplains, hillsides, biologically sensitive lands and significant prehistoric and historic resources. Because RPO-sensitive resources occur on the project site, a RPO Permit is required for implementation of the proposed Project in accordance with Section 101.0462 of the San Diego Municipal Code. Although the City's Municipal Code (containing RPO) was replaced by the Land Development Code (containing the Environmentally Sensitive Lands Ordinance [ESL]) on January 1, 2000, the *Rancho Encantada* project is still subject to pre-2000 Municipal Code requirements because the Montecito and Sycamore Estates sub-project applications were deemed complete prior to the effective date of the Land Development Code. For this reason, the Project is subject to RPO instead of ESL.

Adoption of long range plans, such as the proposed *Rancho Encantada* Precise Plan, is subject to Municipal Code §101.0426.0023, which states that where a RPO Permit is requested concurrently with the processing of a project-specific land use plan, the boundaries of the RPO Permit will be the boundaries of the entire project-specific land use plan, including all individual interior lots. Thus, one RPO Permit is being requested for the *Rancho Encantada* Precise Plan as a long-range planning document. In January 1990, the City Council approved City Council Policy 600-40. The Policy was created to:

- Ensure thorough analysis of site constraints and opportunities in the planning process;
- Aid in the review of subsequent permits and maps within the planning area;
- Ensure protection of environmental resources by preserving contiguous open space systems and providing mechanisms to acquire or protect those resources;
- Ensure that adopted land use policies and objectives are considered in the context of the suitability of the plan area for development.

Council Policy 600-40 requires a thorough analysis of opportunities and constraints of a development area (i.e., a development suitability analysis), including resources that are considered sensitive by RPO. If future or concurrent project or permit applications within *Rancho Encantada* are found to be consistent with the *Rancho Encantada* Precise Plan, then RPO permits for the individual sub-projects may be approved using the substantial conformance determination referenced in the alternative compliance subsection of the RPO. Additionally, encroachment analysis for project or permit applications on the sub-project level is unnecessary, so long as a substantial conformity determination is made that the project or permit is consistent with the *Rancho Encantada* Precise Plan. An evaluation of Project compliance with Council Policy 600-40 and RPO is presented in Section 4.1, LAND USE, of this EIR.

3.5 GENERAL PLAN AMENDMENT

An amendment to the City of San Diego Progress Guide and General Plan is required to adopt the *Rancho Encantada* Precise Plan, which would serve to implement the policies of the general plan. The proposed Precise Plan would be considered part of the Land Use element of the General Plan, so its adoption would be considered an amendment to the General Plan. The Progress Guide and General Plan identifies the project site as a Future Urbanizing Area (FUA) tier and with adoption of the proposed Precise Plan, it would still remain within the FUA tier.

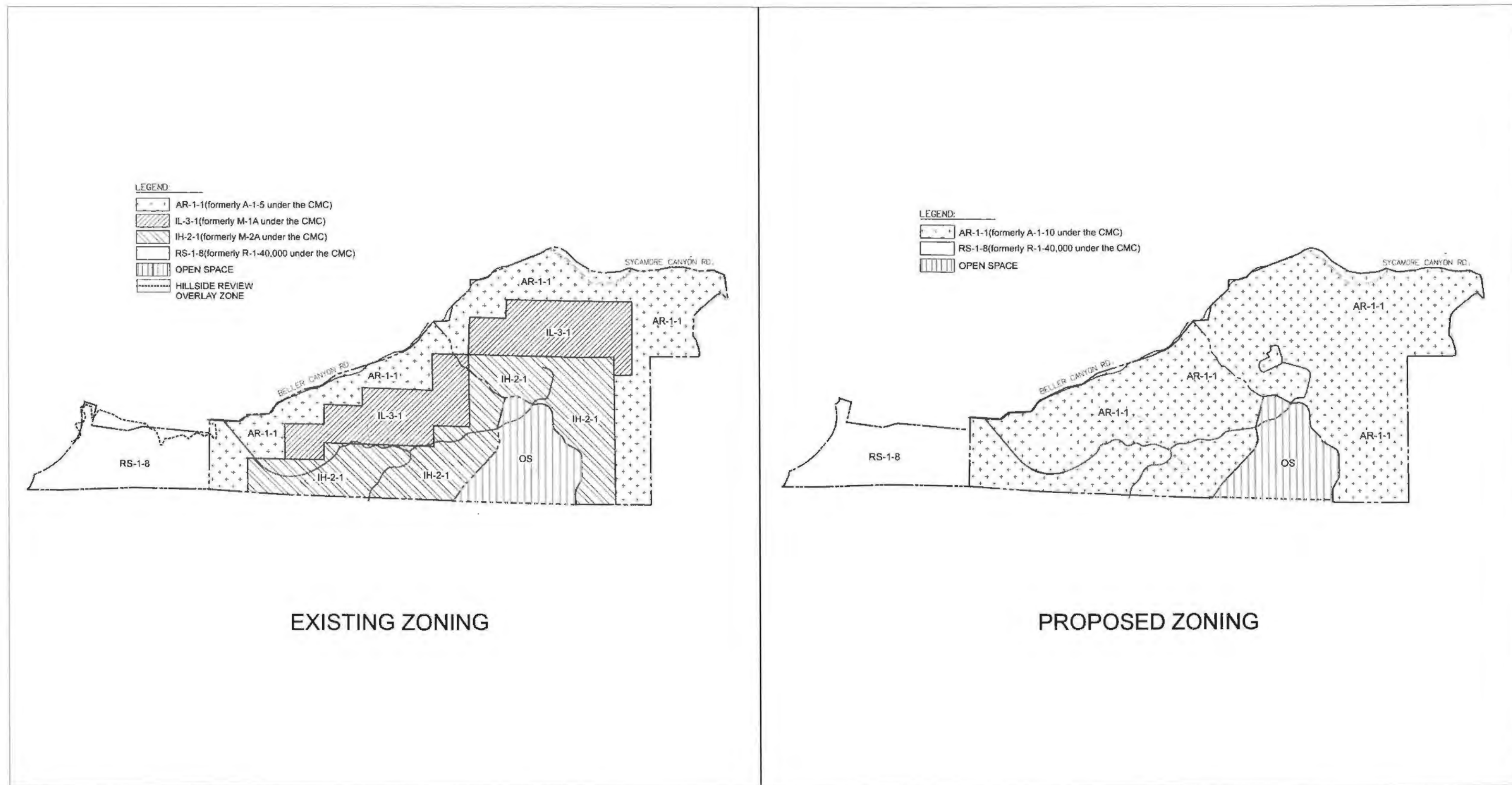
3.6 REZONE

The Sycamore Estates sub-project site is zoned AR-1-1 (Agricultural-Residential; formerly A-1-5 under the City's pre-200 Municipal Code [CMC]), IL-3-1 (Industrial-Light; formerly M-1-A under the CMC) and IH-2-1 (Industrial-Heavy; formerly M-2-A under the CMC). The sub-project site is proposed to be rezoned to AR-1-1. The AR-1-1 zone allows for one residential dwelling unit per ten acres or one unit per four acres using the PRD cluster option. Figure 3-17, *Existing vs. Proposed Zoning*, shows the rezoning of Sycamore Estates from AR-1-1, IL-3-1 and IH-2-1 to AR-1-1. The proposed rezone is requested only for the Sycamore Estates sub-project, and is not necessary for development of the independent Montecito sub-project site as proposed.

As discussed in Section 4.1, LAND USE, the Project is subject to Council Policy 600-29, "Maintenance of the Future Urbanizing Areas as an Urban Reserve," which permits four development options on property located in the Future Urbanizing Area which is zoned agricultural. The Project is proposing development in accordance with Council Policy 600-29 and as such, the Project is not required to undertake a phase shift via a citywide vote per the Managed Growth Initiative.

3.7 MHPA BOUNDARY ADJUSTMENT

As part of the proposed Project, an MHPA boundary adjustment is proposed for the Montecito and Sycamore Estates sub-project sites. The existing MHPA boundary that exists on the project site is shown on Figure 2-6, *MHPA Boundary*, in Section 2.0, ENVIRONMENTAL SETTING. The proposed boundary adjustment would reduce the overall MHPA area on the Montecito sub-project site and



CMC = City of San Diego Municipal Code in effect prior to January 1, 2000



**Figure 3-17
EXISTING VS.
PROPOSED ZONING**

increase the overall MHPA area on the Sycamore Estates sub-project site. The result is an approximate 15.9-acre net loss to the MHPA within the Precise Plan area for the Montecito sub-project. The Sycamore Estates sub-project would have a net gain of 364.2 acres to the MHPA. In total, a 348.3 net-acre increase to the MHPA would occur. A detailed description and analysis of the proposed boundary adjustment, including a graphic illustration, is included in Section 4.3, BIOLOGICAL RESOURCES.

3.8 DEVELOPMENT AGREEMENT AMENDMENT

~~A Development Agreement Amendment between the City of San Diego and the owner of the Sycamore Estates sub-project site is proposed. The amendment is proposed to address certain terms and conditions of a pre-existing development agreement between the City of San Diego and the property owner of the Sycamore Estates sub-project. The development agreement amendment is intended to provide the City with a significant benefit, through an addition to its MHPA area that would not otherwise be acquired through the development process. The agreement is also intended to provide the developer with more certainty as to the development of the property.~~

3.8 AGREEMENT BETWEEN THE CITY OF SAN DIEGO AND THE OWNERS OF SYCAMORE ESTATES

A portion of the Sycamore Estates sub-project site is currently controlled by the terms and conditions of a Development Agreement between the City and General Dynamics filed with the City of San Diego City Clerk's Office on December 2, 1997 as Document No. 00-18448. In addition, that same portion of the site is also subject to a Conservation Agreement and Declaration of Restrictions between General Dynamics and the City dated June 9, 1998 and recorded in the San Diego County Recorder's Office as Document No. 1998-0432188.

An agreement between the City of San Diego and the owner of Sycamore Estates sub-project is proposed to modify the obligations of the City and Sycamore Estates with respect to the Development Agreement. The new agreement provides for a substitution of certain extraordinary benefits originally bargained for in the Development Agreement. Specifically, performance of the new agreement would eliminate any obligation by Sycamore Estates to establish a conservation bank upon the site and to share proceeds of conservation bank sales with the City. Instead, the new agreement would obligate Sycamore Estates to convey Park Land to the City for the expansion of Mission Trails Regional Park, to add new MHPA land to the City's MSCP Preserve (shown on Figure 4.3-8 on page 4.3-50), to establish an endowment trust fund for long-term maintenance of conserved property within Sycamore Estates, and to make a cash payment to the City for the purpose of funding improvements to Mission Trails Regional Park and within the Kearny Mesa community.

3.9 STATE AND FEDERAL PERMITS

State law requires that all EIRs be reviewed by trustee and responsible agencies. A Trustee Agency is defined in Section 15386 of the State CEQA Guidelines as "a state agency having jurisdiction by law over natural resources affected by a project which are held in trust for the people of the State of

California.” Per Section 15381 of the CEQA Guidelines, “the term ‘Responsible Agency’ includes all public agencies other than the Lead Agency which have discretionary approval power over the project.” In the case of the *Rancho Encantada* project, the Lead Agency is the City of San Diego, as defined by Section 15367 of CEQA.

Responsible and/or Trustee Agencies which may have an interest in the project include those listed below. Separate state and federal permits would be issued for each of the two sub-projects so that they could proceed independently. Such permits would include 401 Regional Water Quality Board Certifications, U.S. Army Corps of Engineers (ACOE) Section 404 Permits for impacts to wetland habitat, and Section 1603 Streambed Alteration Agreements with the California Department of Fish and Game (CDFG). It is anticipated that these permit approvals would be found to be within the scope of the overall Project described in this Program EIR, requiring no further CEQA documentation.

3.9.1 CALIFORNIA DEPARTMENT OF FISH AND GAME

The California Department of Fish and Game (CDFG) has the authority to reach an agreement with an agency or private party proposing to affect intermittent or permanent wetlands habitat, pursuant to Section 1603 of the State Fish and Game Code. The CDFG generally evaluates information gathered during preparation of the environmental documentation, and attempts to satisfy their permit concerns in these documents. Where a State-listed threatened or endangered species occurs on a project site, the CDFG would be responsible for the issuance of Memorandum of Understanding (MOU) to ensure the conservation, enhancement, protection and restoration of State-listed threatened or endangered species and their habitats.

3.9.2 U.S. ARMY CORPS OF ENGINEERS

The U.S. Army Corps of Engineers (ACOE) has jurisdiction over development in or affecting the waters of the United States, pursuant to two federal laws: The Rivers and Harbors Act of 1889 and the Clean Water Act, as amended. Army Corps jurisdiction is over “waters of the United States” which is defined at 33 Code of Federal Regulations 328.3 as (1) all navigable waters and their tributaries; (2) all interstate waters and their tributaries; (3) all other waters, the use, degradation, or destruction of which could affect interstate commerce; (4) all water impoundments; (5) territorial seas; and (6) wetland adjacent to waters identified above. Projects that include potential or fill impacts to the “waters of the U.S.” (including wetlands, such as vernal pools) are subject to Section 404 of the Clean Water Act. Impacts to waters of the U.S. (defined as direct fill or indirect effects of fill) require a permit. All permits issued by the ACOE are subject to consultation and/or review by the U.S. Fish and Wildlife Service and the Environmental Protection Agency (EPA). In the case of the *Rancho Encantada* project, a Department of the Army Permit pursuant to Section 404 of the Clean Water Act would be required from the ACOE for any filling of waters of the U.S.

3.9.3 U.S. FISH AND WILDLIFE SERVICE

The U.S. Fish and Wildlife Service is responsible for providing input to the U.S. Army Corps of Engineers as part of the Section 404 process. Acting under the federal Endangered Species Act (ESA), the Fish and Wildlife Service is responsible for ensuring that any action authorized, funded or carried

out by a federal agency (such as the Army Corps of Engineers) is not likely to jeopardize the continued existence of listed species or modify their critical habitat. Section 7 of the ESA requires consultation with the Service where projects have the potential to adversely affect a federally listed threatened or endangered species.

Within areas covered by the City of San Diego's MSCP Subarea Plan, including *Rancho Encantada*, the role of the USFWS (and the CDFG) is limited with respect to species covered under the Subarea Plan. For species covered by the Subarea Plan, the USFWS has granted take authorization to the City in accordance with the requirements of the MSCP Implementing Agreement, executed between the City, the USFWS, and the CDFG. For development footprints on individual parcels that are consistent or equivalent with the City's MHPA, the City, therefore, has authority to grant permits for take of covered species and a separate permit is not required from the USFWS. For ACOE Section 404 Permits, the USFWS will comment to the ACOE on listed species via requirements of the federal ESA. For listed species not included on the MSCP covered species list, the USFWS retains permit authority.

3.9.4 REGIONAL WATER QUALITY CONTROL BOARD (RWQCB) SECTION 401 WATER QUALITY CERTIFICATION

The San Diego Regional Water Quality Control Board (RWQCB) is one of nine regional boards under the California "State Water Resources Control Board" (SWRCB). Under the direction of the SWRCB, the RWQCB exercises authority under the Federal Clean Water Act and correlative state statutes to regulate the discharge of "waste" into waters of the United States within its San Diego region of influence. Regulation in part is done through obtainment of Section 401 Water Quality Certification. Section 401 Certification is based on a finding that the proposed Project Section 404 discharge will comply with all pertinent water quality standards as established by the RWQCB. As part of Section 401 Certification, conditions may be devised by the RWQCB to remove or mitigate potential impacts to water quality standards.

3.10 CITY OF POWAY PERMITS

As a design option of the proposed Project, a gravity sewer system is proposed in lieu of constructing a sewer lift station on the Montecito sub-project site. The gravity sewer system improvements would occur in the City of Poway and are shown on Figure 3-5A, *Off-Site Gravity Sewer Design Option*. This EIR is intended to serve as the environmental review for permits required of the City of Poway for these improvements, and any other off-site infrastructure improvements located within the City of Poway, with the City of Poway serving as a Responsible Agency.

3.11 ASSOCIATED ACTIONS

This EIR serves as the environmental review for associated actions required to implement the *Rancho Encantada* project. Full implementation of the Project will require approval of other related implementing permits such as street and easement vacations, final subdivision maps, grading permits, construction permits, etc. This EIR constitutes the environmental analysis for the Project and each

sub-project and it is anticipated that no further subsequent or supplemental environmental analysis would be required for the actions necessary to implement the proposed Project, even if the two sub-projects are developed independently or if one sub-project is developed without the other.

4.0 Environmental Analysis

4.1 LAND USE

4.1.1 EXISTING CONDITIONS

EXISTING SITE CONDITIONS OF THE RANCHO ENCANTADA PRECISE PLAN AREA

A description of existing site conditions is included as Section 2.0, ENVIRONMENTAL SETTING, of this EIR. In summary, the *Rancho Encantada* Precise Plan area is a 2,658-acre property comprising three areas: Montecito (278 acres), Sycamore Estates (2,132 acres), and a City of San Diego owned parcel (248 acres). A 1.7-acre site containing existing single-family residence is within Montecito. The existing landform is characterized by several narrow divides, v-shaped valley bottoms and steep side slopes. The northern portion of the Montecito sub-project area (including the existing single-family residence), the eastern portion of the Sycamore Estates sub-project area (with the exception of an approximate 34-acre "island" containing existing industrial areas and existing fire breaks), and the City of San Diego owned parcel lie within the City of San Diego's Multiple Habitat Planning Area (MHPA). Vegetation in the Precise Plan area includes ten primary vegetation communities including mulefat scrub, riparian scrub, wet meadow, oak woodland, native and non-native grasslands, Diegan coastal sage scrub, southern mixed chaparral, chamise chaparral, southern willow scrub, and eucalyptus woodland. Some areas of the site, such as private roads and trails, fire breaks, and existing developed areas on Sycamore Estates are void of vegetative cover.

Various San Diego Gas & Electric (SDG&E) transmission line easements are located on the project site. An existing single-family residence is located in the north-central portion of the Project site on a 1.7-acre parcel, and is accessed via a private driveway connecting to Beeler Canyon Road. The Sycamore Estates sub-project site is primarily vacant with the exception of five existing industrial use areas, two water tanks, private roads, trails and firebreaks, several SDG&E easements and a segment of the California Aqueduct.

SURROUNDING LAND USES

Land uses surrounding the *Rancho Encantada* Precise Plan area are shown in Figure 2-4, *Surrounding Land Uses*, and are described in Section 2.2 of this EIR.

APPLICABLE PLANS AND POLICIES

Land use development policies for the City of San Diego are regulated by the City of San Diego Progress Guide and General Plan. According to the Progress Guide and General Plan, the project site is located within the Future Urbanizing Area (FUA). In addition to the City's Progress Guide and General Plan, the City's Multiple Species Conservation Program (MSCP), Resource Protection Ordinance (RPO) (City of San Diego Municipal Code §101.0462), Council Policies 600-40 and 600-29, and Proposition A are applicable to the proposed Project.

Presented below is a summary of the pertinent goals, objectives, and recommendations of the plans and policies that affect development of the project site. A discussion of the Project's compatibility with these plans and policies is addressed in Section 4.1.2, Impact Analysis.

Progress Guide and General Plan

The City's Progress Guide and General Plan is divided into 13 primary elements including Housing; Transportation; Commercial; Industrial; Public Facilities, Services and Safety; Open Space; Recreation; Redevelopment; Conservation; Energy Conservation; Cultural Resources Management; Seismic Safety; and Urban Design. The elements that pertain to the subject property are discussed below.

The **Housing Element** specifies programs that are intended to guide the City's commitment to make adequate provision for the housing needs of all economic segments of the community. A relevant goal contained within the Housing Element pertains to the availability of adequate sites for the development of a variety of housing for all income levels. The policies of the Housing Element state that "[t]he City shall seek to ensure that all housing is developed in areas with adequate access to employment opportunities, community facilities, and public services."

The **Transportation Element** provides the framework for developing a comprehensive transportation system that includes streets, highways and parking to serve vehicular needs; transit, bicycle and pedestrian facilities; and airports, railroads, and maritime facilities. Relevant environmental goals contained within the Transportation Element address the need to provide sufficient parking facilities and to provide a transportation system that is safe, functional, efficient and in balance with the types and intensities of land uses that it serves.

Included in the Transportation Element is a discussion of noise and land use compatibility with transportation-generated noise levels. The Transportation Element promotes reduction of transportation noise to a level that is tolerable and does not constitute a threat to the public health and general welfare. The Transportation Element recommends that both current and projected noise levels be considered in determining land use compatibility. An exterior noise level of 65 decibels (dB) and an interior noise level of 45 dB are considered acceptable noise levels for residential uses.

The **Industrial Element** provides guidelines and recommendations for the allocation of land for industrial use. Relevant goals of this element include ensuring that industrial land needs are met consistent with environmental considerations, protecting manufacturing lands from encroachment by non-manufacturing uses, and maintaining employment growth.

The **Public Facilities, Services and Safety Element** addresses the provision of schools, libraries, police, fire, water, sanitation and flood control. This element identifies schools and the provision of quality education as the most important area of public service and recommends cooperative assistance with school districts in resolving problems arising over the availability of schools in newly developing areas of the City.

The **Open Space Element** supports the conservation and enhancement of San Diego's existing communities and seeks to aid in the creation of new communities which strive to retain and enhance natural amenities. The Open Space Element calls for establishing "*an open space system which provides for the preservation of natural resources, the managed production of resources, the provision of outdoor recreation, the protection of public health and safety, and the utilization of the varied terrain and natural drainage systems of the San Diego community to guide the form of urban development.*" Included within the Open Space Element is a subsection for Open Space Preservation and Development of Sensitive Lands. This subsection requires a planned development permit on sites when sensitive landforms or soils are known or found.

The **Recreation Element** provides standards for the provision of adequate recreational resources. Specifically, it provides goals related to the provision of population-based parks to serve residential development. According to the Recreation Element, neighborhood parks should serve a resident population of 3,500 to 5,000 within approximately a 0.5-mile radius, and community parks should serve a population of 18,000 to 25,000 within approximately a 1.5-mile radius.

The majority of the environmental goals, guidelines and recommendations of the City's Progress Guide and General Plan can be found in the **Conservation Element**. The Conservation Element addresses land resources, water resources, mineral resources, ecological resources and air resources. Present within the Conservation Element's discussion of land resources are such environmental considerations as landform, soils and erosion. The Conservation Element also recognizes the influence of urban development on water quality. The Beeler Canyon area (including the northernmost portions of the project site) is mapped by the Conservation Element as a natural resource preservation area.

The **Cultural Resources Management Element** of the Progress Guide and General Plan establishes goals for the protection of important historical and archaeological resources which help to understand San Diego's past. A relevant objective addressed in this element is to prohibit destruction of those resources that warrant preservation.

The **Seismic Safety Element** addresses geologic hazards (such as active faults, earthquakes, liquefaction and slope stability) and structural hazards (including the seismic-resistant qualities of buildings). According to the Progress Guide and General Plan, "*the basic objective of the Seismic Safety Element is to reduce the risk of hazard resulting from future seismic and related events.*"

The **Urban Design Element** addresses the integration of new development into the natural landscape and/or existing community, with minimum impact on that community's physical and social assets. The Element discusses the "Image of the City" which is composed of a balance of several components including natural and created features.

Multiple Species Conservation Plan

The MSCP is a comprehensive habitat conservation planning program for southwestern San Diego County. A goal of the MSCP is to preserve a network of habitat and open space that will protect biodiversity. The MSCP also is intended to provide an economic benefit by reducing constraints on future development, and thus decreasing the costs of compliance with federal and state laws protecting biological resources through streamlined permit procedures for development projects which impact habitat. Local jurisdictions, including the City of San Diego, implement their portions of the MSCP Plan through subarea plans, which describe specific implementing mechanisms.

The City of San Diego's MSCP Subarea Plan was approved in March 1997. The MSCP Subarea Plan is a plan and process for the issuance of permits under the federal and state Endangered Species Act and the California Natural Communities Conservation Planning Act of 1991. The primary goal of the MSCP Subarea Plan is to conserve viable populations of sensitive species and to conserve regional biodiversity while allowing for reasonable economic growth.

In July 1997, the City of San Diego signed an Implementing Agreement with the U.S. Fish and Wildlife Service (USFWS) and the California Department of Fish and Game (CDFG). The Implementing Agreement serves as a binding contract between the City, the USFWS and the CDFG which identifies the roles and responsibilities of the parties to implement the MSCP and subarea plan. The Agreement became effective on July 17, 1997, and allows the City to issue Incidental Take Authorizations under the provisions of the MSCP. Applicable state and federal permits are still required for wetlands and listed species that are not covered by the MSCP.

The MSCP identifies a 56,831-acre MHPA in the City for preservation of core biological resource areas and corridors. The *Rancho Encantada* project site is located in the Northern study area of the MSCP, as shown in Figure 2-9, *MSCP Subarea Plan - Northern Area*, in Chapter 2.0, ENVIRONMENTAL SETTING. The northern portion of the Montecito sub-project site, the eastern portion of the Sycamore Estates sub-project site (with the exception of an approximate 34-acre "island" containing existing industrial uses and existing fire breaks), and the entire 248-acre City of San Diego parcel are located within the MHPA. As such, these portions of the project area are targeted for preservation. Figure 2-7, *Existing MHPA Map*, depicts the MHPA preserve area identified for the project area by the City's MSCP Subarea Plan. The City's MSCP Subarea Plan states that adjustments to the MHPA boundary line are permitted without the need to amend the City's Subarea Plan, provided the boundary adjustment results in an area of equivalent or higher biological value.

Land uses that are considered compatible with the objectives of the MSCP and which are permitted uses in MHPA open space include:

- passive recreation;
- utility lines and roads (must adhere to MHPA construction and maintenance policies);
- limited water facilities and essential public facilities;

- limited low density residential use;
- brush management zone 2/3; and
- limited agriculture.

Particularly applicable to the project site are two MSCP Priority 2 Special Management directives for Beeler Canyon and adjacent areas, which state:

1. *“Provide educational and awareness programs where existing or proposed residential and industrial uses about the MHPA pursuant to the general adjacency management guidelines. . . .”*; and
3. *“The area immediately to the north of the boundary of MCAS Miramar includes approximately 2,100 acres of the MHPA [referring to the Sycamore Estates sub-project site]. This area is predominately characterized by steep terrain and includes existing military/defense uses associated with the General Dynamics facility. Revegetate disturbed areas within the MHPA with the appropriate native seed mix.*

Also applicable to the project site are MSCP Guidelines C27, C28 and C29 which relate to the Rancho Penasquitos and Beeler Canyon area. Guideline C27 refers to the eastern portion of the Sycamore Estates sub-project site, Guideline C28 refers to the 248-acre City of San Diego parcel, and Guideline C29 refers to the western portion of the Sycamore Estates sub-project site (see Figure 2-8 in Chapter 2.0, ENVIRONMENTAL SETTING).

- C27. *“This area will be permanent open space subject to an agreement between the City and landowners. Existing use areas, including all existing cleared areas and all existing firebreaks, are excluded from the MHPA and will remain subject to existing zoning designations. [Note: existing fire breaks are not graphically shown as excluded from the MHPA on Figures 2-6 and 2-9 of this EIR.] The landowners will dedicate a conservation easement to the City of San Diego or other acceptable entity. The limits of the dedication, subject to the foregoing exclusions, will follow the MHPA boundaries north to the existing access road and will follow the existing ridgetop firebreak immediately south of Site “J”, south of the existing access road. Existing fire breaks may continue to be cleared by mechanical means in accordance with existing practice. New firebreaks shall not be created within the MHPA.”*
- C28. *“Parcels containing areas of the MHPA outside the conservation easement will be subject to potential rezones as OR-1-2 Zone. Seventy-five percent of this area will be preserved as permanent open space while the remaining 25% may be developed subject to all applicable sections of the Land Development Code. Any potential development associated with the areas of the MHPA outside of the conservation easement will be required to avoid all impacts to willow monardella (*Monardella lioides* ssp. *viminea*) and must assure continued wildlife movement through West Sycamore Canyon.”*

- C29. *"This area is not included within the MHPA and will not be subject to rezoning as OR-1-2. Development may occur as permitted in accordance with applicable zoning regulations or potential rezoning."*

The MSCP includes guidelines for development proposed adjacent to the MHPA, called the Land Use Adjacency Guidelines, as set forth by Section 1.4.3 of the City of San Diego MSCP Subarea Plan. These guidelines are summarized below. Section 1.5.2 of the Subarea Plan provides General Management Recommendations to implement these Guidelines.

Drainage: All new and proposed parking lots and developed areas in and adjacent to the Preserve must not drain directly into the MHPA. All developed and paved areas must prevent the release of toxins, chemicals, petroleum products, exotic plant materials, and other elements that might degrade or harm the natural environment or ecosystem processes within the MHPA.

Toxics: Land uses such as recreation and agriculture that use chemicals or generate by-products that are potentially toxic or impactful to wildlife, sensitive species, habitat, or water quality, need to incorporate measures to reduce impacts caused by the application and/or drainage of such materials into the MHPA.

Lighting: Lighting of all developed areas adjacent to the MHPA should be directed away from the MHPA. Where necessary, development should provide adequate shielding with non-invasive plant materials (preferably native), berming, and/or other methods to protect the MHPA and sensitive species from night lighting.

Noise: Uses in or adjacent to the MHPA should be designed to minimize noise impacts. Excessively noisy uses or activities adjacent to breeding areas must incorporate noise reduction measures and be curtailed during the breeding season of sensitive species.

Barriers: New development adjacent to the MHPA may be required to provide barriers (e.g., non-invasive vegetation, rocks/boulders, fences, walls, and/or signage) along the MHPA boundary to direct public access to appropriate locations and reduce domestic animal predation.

Invasives: No invasive non-native plant species shall be introduced into areas adjacent to the MHPA.

Brush Management: New residential development located adjacent to and topographically above the MHPA (e.g., along canyon edges) must be set back from slope edges to incorporate Zone 1 brush management areas on the development pad and outside of the MHPA. Zone 2 is a permitted use in the MHPA upon granting of an easement to the City (or other acceptable agency) except where narrow wildlife corridors require it to be located outside of the Preserve. The amount of woody vegetation clearing shall not exceed 50% of the vegetation existing when the initial

clearing is done. Vegetation clearing shall be done consistent with City standards and shall avoid/minimize impacts to covered species to the maximum extent possible. For all new development, regardless of the ownership, the brush management in the Zone 2 area will be the responsibility of a homeowners association or other private party.

Grading/Land Development: Manufactured slopes associated with site development shall be included within the development footprint for projects within or adjacent to the MHPA.

Resource Protection Ordinance

The City of San Diego regulates development of environmentally sensitive lands through the Resource Protection Ordinance (RPO). An amendment to the City's RPO was adopted on January 12, 1998 (Ordinance No. 18456) to make the regulations of the Land Development Code which relate to biologically sensitive lands effective as part of the RPO during the interim period before the Land Development Code become effective. The Land Development Code became effective on January 1, 2000. Although the City's Municipal Code (containing RPO) was replaced by the newly approved Land Development Code [containing the Environmentally Sensitive Lands Ordinance (ESL)] on January 1, 2000, the *Rancho Encantada* project is still subject to Municipal Code requirements because the Montecito and Sycamore Estates sub-project applications were deemed complete prior to the effective date of the Land Development Code. For this reason, the Project is subject to RPO instead of ESL. The purpose and intent of RPO is "to protect, preserve, and, where damaged, restore the environmentally sensitive lands of San Diego, which include wetlands, wetland buffers, floodplains, hillsides, sensitive biological resources, and significant prehistoric and historic resources."

Adoption of a long range plan, such as the proposed *Rancho Encantada* Precise Plan, is subject to Municipal Code §101.0426.0023, which states that where a RPO Permit is requested concurrently with the processing of a project-specific land use plan, the boundaries of the RPO Permit will be the boundaries of the entire project-specific land use plan, including all individual interior lots. Thus, one RPO Permit is being requested for the *Rancho Encantada* Precise Plan as a long-range planning document. In January 1990, the City Council approved City Council Policy 600-40, directing how RPO analysis relates to the preparation and implementation of long-range plans such as the *Rancho Encantada* Precise Plan. The Policy was created to:

- Ensure thorough analysis of site constraints and opportunities in the planning process;
- Aid in the review of subsequent permits and maps within the planning area;
- Ensure protection of environmental resources by preserving contiguous open space systems and providing mechanisms to acquire or protect those resources;
- Ensure that adopted land use policies and objectives are considered in the context of the suitability of the plan area for development.

Council Policy 600-40 requires a thorough analysis of opportunities and constraints of a development area (i.e., a development suitability analysis), including resources that are considered sensitive by RPO. If future or concurrent project or permit applications within *Rancho Encantada* are found to be consistent with the *Rancho Encantada* Precise Plan, then RPO permits for the individual sub-projects may be approved using the substantial conformance determination referenced in the alternative compliance subsection of the RPO. Additionally, encroachment analysis for project or permit applications on the sub-project level is unnecessary, so long as a substantial conformity determination is made that the project or permit is consistent with the *Rancho Encantada* Precise Plan.

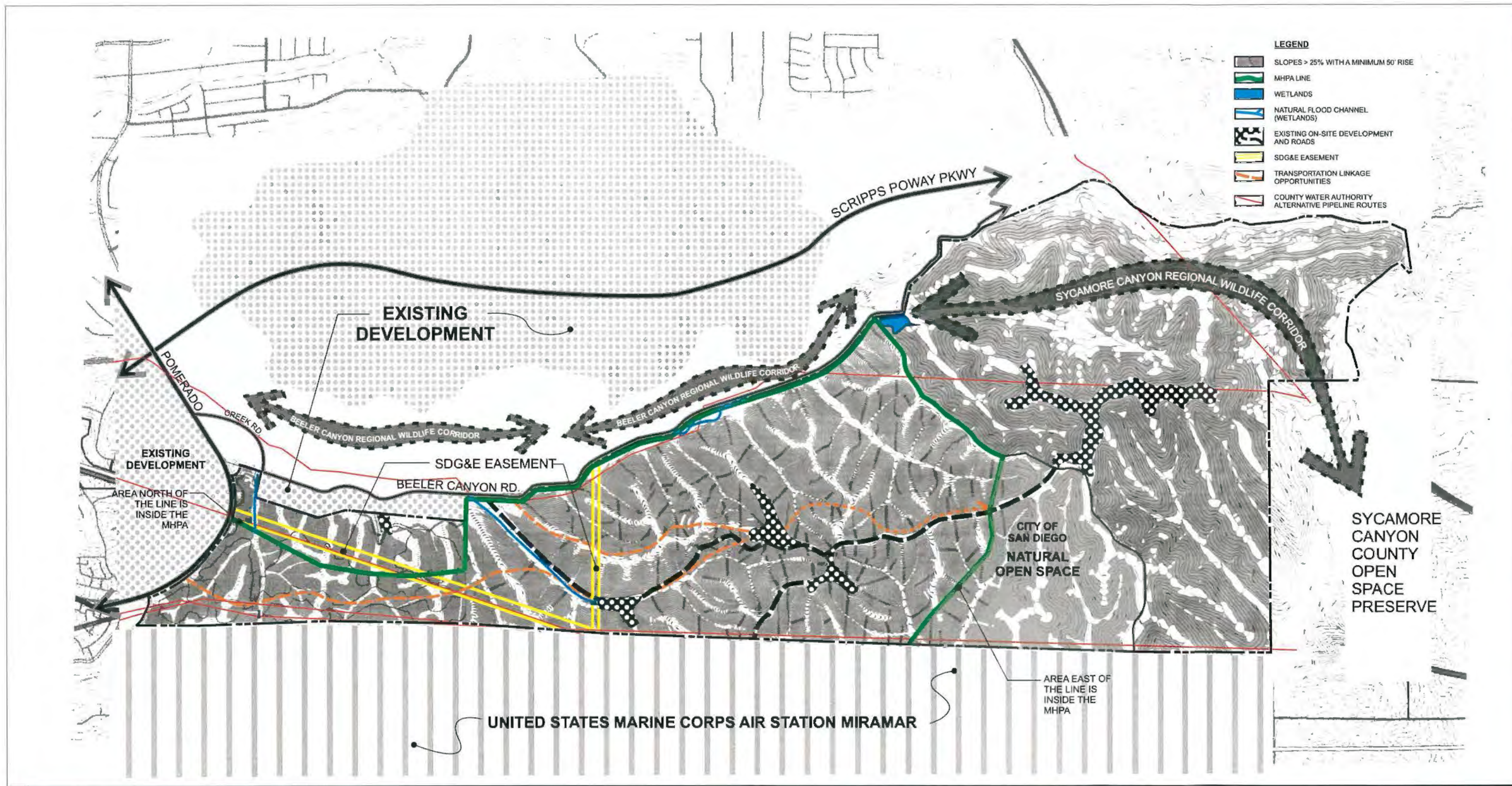
Council Policy 600-40

Council Policy 600-40 provides that a development suitability analysis be conducted as a first step in the preparation of a long range plan. This development suitability analysis is intended to ensure that environmental resources and other site constraints and opportunities are fully considered in preparation of a long-range plan such as the proposed *Rancho Encantada* Precise Plan.

The project site has been evaluated by the City and analyzed regarding environmental resources and other site constraints as well as the areas of the property best suited for development. The City Council has reviewed and approved the MSCP, which included both the Montecito and Sycamore Estates sub-project sites. The City Council also has approved conceptual development areas and a Development Agreement with General Dynamics, then-owner of the Sycamore Estates site, which covers, in part, the Sycamore Estates sub-project site. Provided below is a summary of various factors that affect development of the project site.

Slopes Greater than 25 Percent: Approximately 1,742 acres, or 66 percent, of *Rancho Encantada* contain slopes with gradients in excess of 25% and a height differential of 50 feet or more. These slopes are illustrated on Figure 4.1-1, and encompass approximately 199 acres on the Montecito sub-project site, approximately 1,543 acres on the Sycamore Estates sub-project site, and approximately 194 acres on the City of San Diego owned parcel.

Sensitive Biological Resources: Vegetation in the Precise Plan area includes ten sensitive vegetation communities including mulefat scrub, riparian scrub, wet meadow, oak woodland, native and non-native grasslands, Diegan coastal sage scrub, southern mixed chaparral, chamise chaparral, and southern willow scrub. Natural flood channels (wetlands) and ephemeral drainages (Waters of the U.S.) also are located on the site. Sensitive habitat types located within the Precise Plan area are shown along with a complete list of sensitive species located on the site in Section 4.3, BIOLOGICAL RESOURCES, of this EIR.



SOURCE: RBF, NOLTE, HELIX ENVIRONMENTAL PLANNING



FIGURE 4.1-1
COUNCIL POLICY
600-40 SENSITIVE RESOURCES

Surrounding Development: The *Rancho Encantada* Precise Plan area is surrounded by developed areas in the City of Poway to the north and the communities of Scripps Miramar Ranch and Miramar Ranch North to the west. South of the site are undeveloped portions of MCAS Miramar and east of the site is the Sycamore Canyon County Open Space Preserve and rural residential homes and ranches.

Utility Easements: SDG&E maintains a 200-foot wide easement from the northwest portion of Montecito to the southwest portion of Sycamore Estates. The easement accommodates 138-kV and 230-kV overhead transmission lines and four steel lattice towers. Two parallel SDG&E easements of 12-foot and 25-foot in width are located in the western portion of Sycamore Estates, containing one 69-kV circuit. Other smaller easements also are located throughout the site. The San Diego County Water Authority has proposed several alternative water pipeline alignments in the vicinity of the project site. Three of the alternatives traverse or are adjacent to the proposed project site.

Planned Circulation Linkages: The *Rancho Encantada* Precise Plan area is served primarily by Pomerado Road and Beeler Canyon Road. Pomerado Road abuts the project boundary to the west and Beeler Canyon Road abuts the project boundary to the north, although within some areas, Beeler Canyon Road is within the project site area.

Wildlife Corridors: The project site is connected to regional wildlife corridors and linkages to the east, south and north, including corridors in Beeler Canyon and Sycamore Canyon.

View Opportunities: View opportunities on-site are primarily available from the tops of the on-site ridges. Views from the site's higher elevations are available in nearly all directions, especially toward the east where there is undeveloped open space and to the west where the local residential communities of Scripps Miramar Ranch and Miramar Ranch North can be seen. Views to the site are possible from surrounding public roadways, including Pomerado Road, Beeler Canyon Road, Kirkham Way, and Scripps Poway Parkway. Portions of the site also are visible from the adjacent Sycamore Canyon County Open Space Preserve to the east, MCAS Miramar to the south, the City of Poway to the north, and residential areas west of Pomerado Road.

Proposition A/ Council Policy 600-29

Council Policy 600-29, "Maintenance of the Future Urbanizing Areas as an Urban Reserve," was enacted to avoid premature urbanization, to conserve open space and natural environmental features and to protect the fiscal resources of the City by precluding costly sprawl and/or leapfrog urban development. Council Policy 600-29 permits four development options on property located in the Future Urbanizing Area which is zoned agricultural.

1. "Development pursuant to the A-1 zoning regulations, at the density and minimum lot size permitted in the applicable zone."

2. *“Development pursuant to the Rural Cluster Development regulations, at the density permitted in the applicable zone, but clustered in order to promote more efficient land utilization and land conservation. . . .”*
3. *“Development pursuant to the Planned Residential Development regulations, at a density not to exceed one dwelling unit per four acres, in order to promote the permanent preservation of lands designated in the General Plan as part of the Environmental Tier through the provision of public and private open space easements and/or dedications; provided, however, that in return for the density increase granted by the City Council, no future development rights shall remain on the property. . . .”*
4. *“Development pursuant to the Conditional Use Permit regulations, provided that the conditional uses are natural resource-dependant, non-urban in character and scale, or of an interim nature which would not result in an irrevocable commitment of the land precluding future uses.”*

Except for development as permitted under Council Policy 600-29, Proposition A, the “Managed Growth Initiative,” specifies that the existing non-urban land use pattern and character of the Future Urbanizing Area should be retained until such time as the City Council and the electorate approve a phase shift reclassifying the land from Future Urbanizing to Planned Urbanizing and a land use plan is adopted. The proposed Project is not proposing a phase shift via a citywide vote per the Managed Growth Initiative, but instead proposes development in accordance with Council Policy 600-29.

4.1.2 IMPACT ANALYSIS

Issue 1: *How is the proposed project consistent with the land use designations, intensity of development and environmental goals of the City of San Diego Progress Guide and General Plan, and surrounding existing and planned land uses?*

Significance Criteria

The proposed project would have a significant land use impact if any one or more of the following would occur as a result of the project.

- a. Inconsistency/conflict with the environmental goals, objectives, or guidelines of a community or general plan.
- b. Inconsistency/conflict with an adopted land use designation or intensity and indirect or secondary environmental impacts occur.
- c. Substantial or extreme use incompatibility.

- d. Development or conversion of general plan or community plan designated open space to a more intensive land use.
- e. Incompatible uses in an aircraft accident potential area as defined in an airport land use plan.
- f. Inconsistency/conflict with adopted environmental plans for an area.

An inconsistency with a plan, however, is not necessarily a significant environmental impact; the inconsistency would have to relate to an environmental issue to be considered significant under CEQA.

Impact Analysis

COMPLIANCE WITH THE PROGRESS GUIDE AND GENERAL PLAN

As indicated previously, land use development and policies for the City of San Diego are generally regulated by the City's Progress Guide and General Plan. The goals of the Progress Guide and General Plan would be implemented through the development of the proposed *Rancho Encantada* project and the Montecito and Sycamore Estates sub-projects as demonstrated below.

Housing Element

The Project is regarded as a positive contribution to the City's housing stock by providing housing opportunities in the northeast portion of the city. Housing diversity is proposed within the *Rancho Encantada* Precise Plan area. A total of 834 single family homes would be located within the Project, including 277 single family homes in the Montecito sub-project and 557 single family homes in the Sycamore Estates sub-project. In addition, one existing single family residence would be retained on 1.7 acres in the northern portion of the site. Affordable housing also is proposed as part of the Precise Plan and the Sycamore Estates sub-project, consisting of 106 affordable multi-family units on a 9.9-acre site. The Montecito sub-project would provide for 277 single-family lots ranging in size from 5,000 square feet to 9,600 square feet. The Sycamore Estates sub-project would provide for 557 single-family lots ranging in size from 9,600 square feet to more than 12,000 square feet and 106 affordable housing units. Because the Project would positively contribute to the City's housing stock and because diversity in lot sizes would be provided within each of the sub-projects, the goals of the Housing Element would be met and no adverse housing impacts would occur.

Transportation Element

The *Rancho Encantada* project site borders Pomerado Road to the west and Beeler Canyon Road to the north. The Project's main entry would connect to Pomerado Road and a traffic signal would be installed at this location. An estimated 10,548 average daily trips (ADT) would be added to the local roadway system as a result of the Project. The Project would add

traffic to various roadway segments and intersections that would operate at LOS E or F with or without the addition of Project traffic. In this regard, the Project would result in significant cumulative traffic impacts. With the application of mitigation measures specified in Section 4.6, TRANSPORTATION, direct and cumulative impacts would be reduced to below a level of significance, with the exception of direct and cumulative traffic impacts on Pomerado Road. This direct and cumulative traffic impact would be inconsistent with the Transportation Element resulting in a significant impact.

The City's accepted noise criteria for residential uses are 45 dB(A) CNEL (interior) and 65 dB(A) CNEL (exterior). As discussed in Section 4.7, NOISE, elevated on-site noise exposure would occur along the western perimeter of the Montecito sub-project site due to vehicular traffic on Pomerado Road. Because proposed homes would be at a lower elevation than the roadway, and because no residential lot is proposed within 100 feet of the Pomerado Road centerline, exterior noise impacts would not be significant; interior noise impacts have the potential to occur, however, if homes would be located within 200 feet of the Pomerado Road centerline. Homes proposed within 80 feet of the Rancho Encantada Parkway centerline would be subject to interior and exterior noise levels that would exceed City standards, and mitigation would be required. With the application of the mitigation measures specified in Section 4.7, NOISE, the Project would be consistent with the Transportation Element.

As discussed in Section 4.7, implementation of the proposed Project at buildout would increase vehicular noise levels along Scripps Poway Parkway, Pomerado Road, and Spring Canyon Road by 0 - 2 dB at 100 feet from centerline. Existing land uses located along these roadway segments are sufficiently set back and buffered from the roadway such that an increase of 1 - 2 dB would not be significant. Along Pomerado Road, the noise level along several segments would increase by 1 dB, with maximum exterior noise levels at 100 feet from the centerline increasing from 70 to 71 dB. An existing block wall is located along the west side of Pomerado Road, between the roadway edge and existing residential homes which adequately reduces vehicular noise impacts on existing residential homes to below a level of significance.

Industrial Element

As part of the proposed Sycamore Estates sub-project, the property would be rezoned from AR-1-1 (Agricultural-Residential), IL-3-1 (Industrial-Light) and IH-2-1 (Industrial-Heavy) to AR-1-1. The AR-1-1 zone allows for one residential dwelling unit per ten acres or one unit per four acres using the PRD cluster option. The proposed rezone would not be consistent with the Industrial Element of the General Plan that calls for the protection of manufacturing lands from encroachment by non-manufacturing uses. Inconsistency with the Industrial Element is regarded as a significant land use impact.

Public Facilities, Services and Safety Element

No significant unmitigated health or safety impacts would occur as a result of the proposed *Rancho Encantada* project as discussed in Section 4.12, PUBLIC SAFETY. A Phase I

Environmental Site Assessment conducted for the Project revealed that existing septic systems, diesel fuel tank and six industrial buildings located on the Sycamore Estates sub-project site are not hazardous. Nonetheless, mitigation measures are included in Section 4.12 to reduce potentially significant hazardous materials impacts to below a level of significance. Cultural Resource site CA-SDI-15159H, a WWII-era training airplane crash site, also represents a potentially significant hazard due to the possible existence of casings having functional primers. Mitigation consisting of flagging the site, special stockpiling requirements and materials examination would reduce this potential impact to below a level of significance.

As discussed in Section 4.11, PUBLIC SERVICES, adequate library, school, sewer, water, fire, police and solid waste services would be able to service the development. Necessary on-and off-site water and sewer line improvements would be located underground; therefore, no land use or community character impacts would occur from the physical construction of these improvements or from their operation. The proposed on-site water pump stations and the optional sewer pump station would be enclosed in concrete masonry structures and sufficiently screened by landscaping to assure compatibility with adjacent land uses. The proposed water reservoir would be buffered from adjacent residential homes by a landscaped slope and berm.

An elementary school site and public park are proposed on the Sycamore Estates sub-project site. Provision of the on-site public park adjacent to the proposed elementary school site would satisfy the Project's active parkland requirement. Conveyance of the proposed elementary school site to the Poway Unified School District and payment of the state statutory school mitigation fee would reduce cumulative public education impacts to a level below significance (see Section 5.0, CUMULATIVE EFFECTS). If the Montecito sub-project is developed separately or prior to development of the Sycamore Estates sub-project, the Montecito sub-project's payment of statutory school mitigation fees and/or entering into a school mitigation agreement with the Poway Unified School District and payment of fees would reduce direct and cumulative school and park impacts generated by the Montecito sub-project to below a level of significance.

With the application of mitigation measures included in Sections 4.11, PUBLIC SERVICES, and 4.12, PUBLIC SAFETY, the Project would be consistent with the Public Facilities, Services and Safety Element of the City's Progress Guide and General Plan.

Open Space Element

The Precise Plan would preserve approximately 1,989.2 acres, or 75 percent of the Precise Plan area, as natural open space. Large portions of the natural open space areas contain slopes in excess of a 25% gradient and sensitive biological resources. No FEMA-mapped 100-year floodplains exist on the site. Approximately 120.7 acres (57 percent) of the Montecito sub-project would not be developed, a portion of which would be included in the City's MHPA, and an additional 40.4 acres would consist of revegetated manufactured slopes. The entire 248-acre City of San Diego owned parcel would be retained in open space (except for a road crossing), as well as approximately 1,620.5 acres (80 percent) of natural open space and 88.9 acres of

revegetated manufactured slopes within the Sycamore Estates sub-project site. Because approximately 57 percent of the Montecito sub-project, 100 percent of the City of San Diego owned parcel and 80 percent of the Sycamore Estates sub-project would consist of open space preservation and revegetated manufactured slopes, no conflicts with the Open Space Element would occur.

Recreation Element

As part of the proposed Precise Plan and the Sycamore Estates sub-project PRD and VTM, a 4.0-net acre public park site and a 10.0 to 12.0-acre elementary school site would be provided on-site. The park and school site is planned central to the Precise Plan area, and would be accessible to Project residents via the proposed street, bicycle lane and sidewalk/trail network. The provision of a 4.0-acre public park site adjacent to a proposed elementary school site would satisfy the Project's public park requirement, and impacts would not be significant. If the Sycamore Estates sub-project is not developed or does not provide the public park and elementary school site, the payment of City park fees by the Montecito sub-project would satisfy or be consistent with the Recreation Element of the General Plan. Refer to Section 4.11, PUBLIC FACILITIES, for a more detailed analysis of recreational resources impacts.

Conservation Element

Ten sensitive habitat communities are located on the project site. Direct impacts to on- and off-site native habitats and sensitive species caused by grading and development are considered significant and would require mitigation. Mitigation for project impacts to vegetation communities would consist of on-site preservation for the Sycamore Estates sub-project and a combination of on-site preservation and off-site habitat acquisition for the Montecito sub-project, as described in Section 4.3, BIOLOGICAL RESOURCES. Mitigation for project impacts to sensitive species would include construction limitations during breeding and nesting seasons, and irrigation limitations for manufactured slopes upslope of the willow monardella population.

As part of the proposed Project, portions of the Montecito and Sycamore Estates sub-project sites would be graded and manufactured slopes would be created, resulting in significant impacts to landform. Highly visible slopes would be contour graded and revegetated, which would reduce impacts, but not to below a level of significance. (See Section 4.2, LANDFORM/VISUAL QUALITY, for a detailed discussion of proposed grading.) Both the Montecito and Sycamore Estates sub-projects would include appropriate grading techniques, erosion control measures and prompt revegetation of disturbed areas so that "*runoff, sedimentation, and erosion both during and after construction*" is controlled. The Project also would be required to implement relevant Best Management Practices for stormwater discharge. (See Section 4.5, HYDROLOGY/WATER QUALITY, and Section 4.4, GEOLOGY AND SOILS, for detailed discussions of the erosion potential for on-site soils and potential impacts to hydrology and water quality, as well as measures to control runoff, minimize erosion and limit the Project's contribution of urban pollutants to sensitive water bodies.) As discussed in Section

4.14, NATURAL RESOURCES, the Project would result in a significant cumulative and unmitigable impact to aggregate resources because site development would preclude future use of the site for aggregate resource extraction. With the application of mitigation measures contained in this EIR, the Project would be consistent with the Conservation Element with the exception of cumulative impacts to natural (aggregate) resources.

Cultural Resources Management Element

Cultural resource surveys have been conducted for the project site, and all cultural resource sites that would be impacted by the Project have been evaluated for importance. As discussed in Section 4.9, CULTURAL RESOURCES, no important cultural resource sites exist on the Montecito sub-project site or along the off-site gravity sewer alignment. Because the Montecito sub-project site would not impact important cultural resources, that portion of the Project would be consistent with the Cultural Resources Management Element. The Sycamore Estates sub-project site contains eight cultural resource sites. Of the eight sites, six are located within the limits of development, and seven have been determined not to be significant. One site is potentially significant, but could not be tested due to its inaccessibility. Monitoring of this site is required as mitigation. Because no unmitigated cultural resources impacts would occur, the Project is in compliance with the Cultural Resources Management Element.

Seismic Safety Element

Consistent with this Element, three geologic and soil surveys have been conducted for the *Rancho Encantada* project site. The surveys determined that the development areas within the site are suitable for the proposed development with implementation of conventional grading techniques and adherence to recommendations contained in the geotechnical reports. See Section 5.7, GEOLOGY AND SOILS, for a summary of the survey results and a discussion of measures necessary to “reduce the risk of hazard resulting from future seismic and related events.” The Project would be consistent with the Seismic Safety Element and impacts would not be significant.

Urban Design Element

The *Rancho Encantada* project proposes single family and multi-family dwelling units, a school/park site, two institutional sites, and MHPA preserve open space. Development within the *Rancho Encantada* project site would be clustered in the central and western portions of the project site and surrounded by open space. Residential development proposed within the Project would be compatible with the nature and character of existing residential development in the adjacent Scripps Miramar Ranch and Miramar Ranch North communities through implementation of guidelines in the proposed Precise Plan. The Urban Design Element would be satisfied whether the sub-projects are developed separately or together. Although the type of development proposed would be compatible with the surrounding land uses, the character of the site would be changed from a relatively vacant land area to that of a residential neighborhood. This change is regarded as a significant and unmitigated visual quality impact.

□ COMPATIBILITY WITH SURROUNDING EXISTING AND PLANNED LAND USES

Figure 2-4, *Surrounding Land Uses*, in Chapter 2.0, ENVIRONMENTAL SETTING, illustrates the various land uses surrounding the project site. As shown, the site is surrounded by MCAS Miramar to the south, the community of Scripps Miramar Ranch and Miramar Ranch North to the west, open space and rural residential uses in the City of Poway and the City of San Diego to the immediate north, and the Sycamore Canyon County Open Space Preserve and rural residential uses in unincorporated San Diego County to the east. In addition, a small mining operation is located north of Beeler Canyon Road. As proposed by the *Rancho Encantada* Precise Plan, on-site trails would link local trails such as the City of Poway trails system to the northeast, Sycamore Canyon to the southeast and Los Penasquitos Canyon to the west.

Residential development within the *Rancho Encantada* Precise Plan is proposed in the western and central portions of the project site and would be surrounded by open space on all sides, with the exception of development proposed on the Montecito sub-project site adjacent to Pomerado Road. Because a majority of the development areas would be buffered and separated from adjacent land uses by large expanses of open space, no land use compatibility impacts are anticipated to occur at the project edges. Development on the Montecito sub-project site would be located an average of 500 feet south of the existing rural residential uses located along Beeler Canyon Road, and an average of 100 feet higher in elevation. The closest residential lot proposed for the Montecito PRD is Lot 275, in Planning Area 3 located 430 feet south of and 145 feet higher than the nearest existing off-site rural lot adjacent to Beeler Canyon Road. The open space area between the on-site and off-site existing lots would be included as part of the MHPA and preserved as natural open space in perpetuity. The linear and elevational distance provides an adequate buffer at the northwestern project boundary, and land use compatibility impacts would not occur. Residential development proposed in the western portion of the Precise Plan area adjacent to Pomerado Road would be regulated by the proposed Montecito PRD and related Design Guidelines and Development Standards. Compliance with the PRD design guidelines would ensure appropriate setbacks along this roadway. An existing block wall is located along the west side of Pomerado Road, between the roadway edge and existing residential homes which adequately reduces increased vehicular noise levels along Pomerado Road caused by project generated traffic to below a level of significance.

The proposed Project's potential air quality impacts associated with construction activities, noise impacts associated with project-generated traffic and flight activities from MCAS Miramar, impacts associated with the various issue areas contained in the MSCP Land Use Adjacency Guidelines, and impacts associated with the loss of on-site aggregate resources are discussed in the following respective sections of the EIR: Section 4.8, AIR QUALITY, Section 4.1, LAND USE (Issue Question No. 3 below), and Section 4.4, GEOLOGY/SOILS.

The San Diego County Water Authority has proposed several alternative water pipeline alignments in the vicinity of the project site. Three of the alternatives traverse or are adjacent to the proposed project site. One alignment is proposed within an on-site 200-foot-wide SDG&E easement which would be maintained at its existing grade as part of the proposed Project. Because the proposed Project would not substantially alter the ground surface within the SDG&E easement, implementation of the Project

would not conflict with or preclude the construction of this proposed water line alignment. The other two alignments traverse along the northern and southern property boundaries. Development is not proposed by the *Rancho Encantada* project over these alignments, except in the southern portion of the Montecito sub-project site, where single-family residential homes would occur. As disclosed in the San Diego County Water Authority's EIR/EIS for the proposed Water Storage Project (State Clearinghouse No. 93011028; Army Corps File No.95-20092-DZ), the pipeline would be tunneled under developed areas. Thus, significant land use compatibility impacts would not occur.

□ GRAVITY SEWER DESIGN OPTION - LAND USE COMPATIBILITY

Off-site sewer line improvements in the City of Poway would be located underground; therefore, no land use or community character impacts would occur from the physical construction of these improvements or from their operation. As shown in Figure 3-5A, off-site gravity sewer improvements would be located in public street rights-of-way, with the exception of a 1,100-foot segment between Creek Road and Pomerado Road and a 920-foot segment between Pomerado Road and Stage Stop Road. These two segments would cross private property and would be located in an easement. These properties are zoned OS-1/DU and RS-2 (see Figure 4.1-2) and are located within the FEMA-mapped floodplain of Beeler Canyon Creek, also designated as a special flood hazard area (SFHA) by the City of Poway. According to the City of Poway Municipal Code, all development in the floodplain shall be in accordance with the National Flood Insurance requirements and City of Poway requirements, including Municipal Code Chapter 16.88, Provisions for Flood Hazard Reduction. Compliance with FEMA and City of Poway requirements would reduce flood hazard impacts on the off-site gravity sewer line to a level less than significant.

Significance of Impacts

Inconsistency with the Industrial Element of the City of San Diego's Progress Guide and General Plan is regarded as a significant land use impact. Direct and cumulative impacts associated with landform alteration/visual quality and traffic on Pomerado Road, and cumulative impacts that are associated with biology (loss of non-native grassland habitat), hydrology/water quality, air quality, paleontological resources landfill capacity, water conservation and aggregate resources would be significant. The proposed Project would implement measures that would mitigate to below a level of significance direct impacts associated with biology, geology/soils, hydrology/water quality, noise, cultural resources, paleontological resources, public services, water conservation and public safety. Therefore, the Project's potential land use plan incompatibilities in these areas would likewise be adequately mitigated.

Mitigation Measures, Monitoring and Reporting Program

The Project's significant land use impacts associated with impacts to landform alteration, biology, geology/soils, hydrology/water quality, transportation, noise, air quality, cultural resources, paleontological resources, public services, public safety and water conservation would be mitigated or lessened by the adherence to mitigation measures identified for other topics addressed in this EIR. Specific mitigation measures are presented in the following sections of this document.

<u>Issue Area</u>	<u>Section</u>
Landform Alteration	4.2
Biology	4.3
Geology/Soils	4.4
Hydrology/Water Quality	4.5
Transportation	4.6
Noise	4.7
Air Quality	4.8
Cultural Resources	4.9
Paleontological Resources	4.10
Public Services	4.11
Public Safety	4.12
Water Conservation	4.13

Direct and cumulative impacts associated with landform alteration/visual quality and transportation (contribution to traffic on Pomerado Road), and cumulative impacts associated with biology (loss of non-native grassland habitat), hydrology/water quality, air quality, paleontological resources, landfill capacity, water conservation and natural resources would remain significant and unmitigable. Selection of the Reduced Project, Reduced Grading or RPO Consistent Alternative would reduce these impacts, but not to below a level of significance (see Chapter 9.0, ALTERNATIVES). Natural resource impacts due to inconsistency with the Industrial Element would be fully eliminated by selection of the Mineral Resource Extraction Alternative.

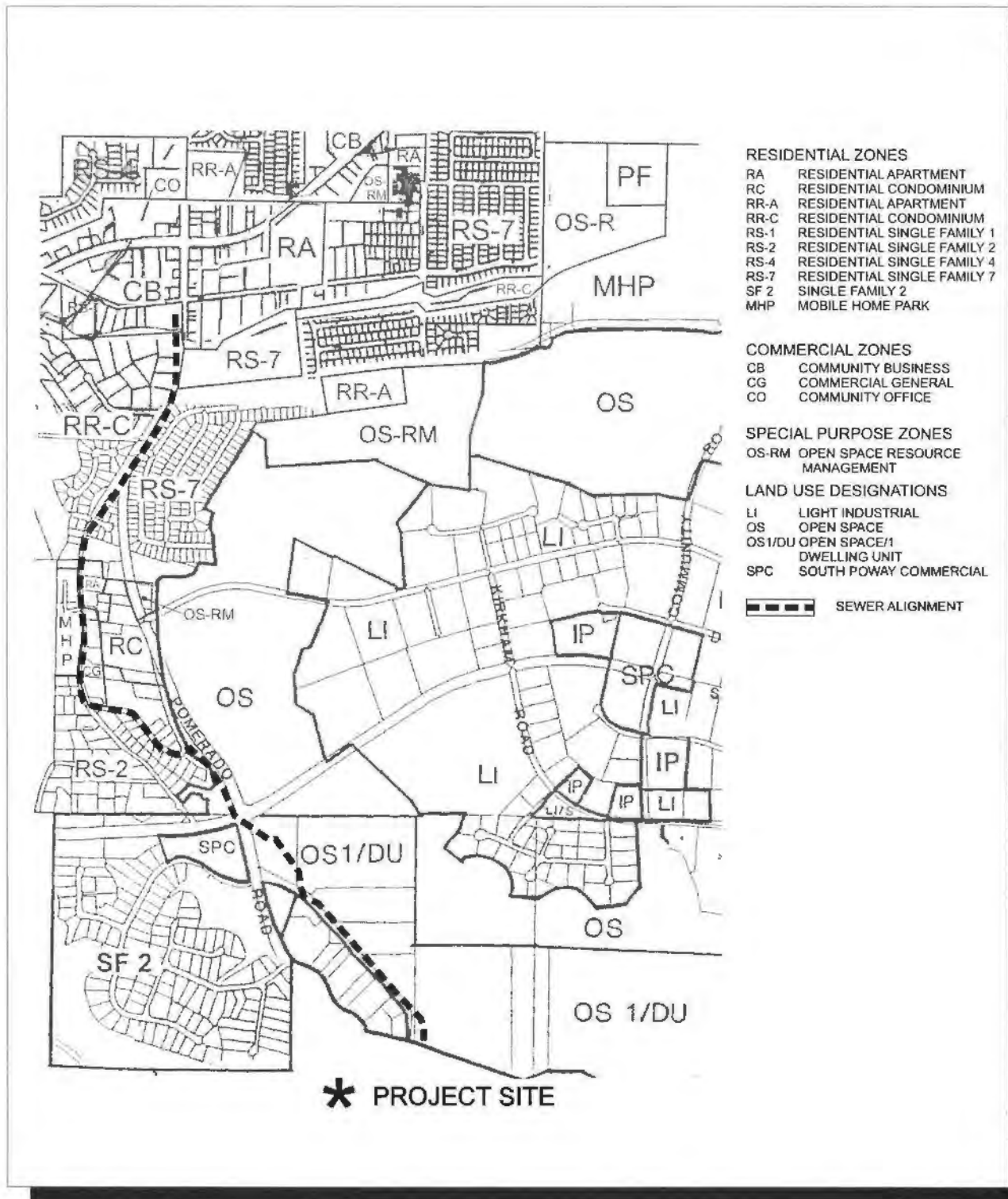


Figure 4.1-2
OFF-SITE GRAVITY SEWER DESIGN OPTION
CITY OF POWAY LAND USE/ZONING DESIGNATION



Issue 2: *How does the proposed project relate to the purpose and intent of Council Policy 600-40?*

Significance Criteria

The proposed Project would have a significant land use impact if it was not consistent with the purpose and intent of Council Policy 600-40.

Impact Analysis

Consistency With Council Policy 600-40

Below is a discussion of the development suitability analysis for the proposed Project. The analysis categorizes the 2,658-acre project site into three categories based on development potential. These categories are rated as High, Medium and Low, and are delineated on Figure 4.1-3, *Development Suitability Analysis*. The areas designated as “High” have the greatest potential for development in the Project area. The areas designated “Medium” are also suitable for development, but may require implementation of specific measures to mitigate potential impacts to resources. Areas designated as “Low” should, in most cases, be preserved as open space and should not be developed.

Resources (wetlands, 100-year floodplain, hillsides, sensitive biological resources, and significant prehistoric and historic resources) addressed by the Resource Protection Ordinance (RPO), and development constraints and opportunities (slopes greater than 25%, sensitive biological resources, surrounding development, utility easements, planned circulation linkages, wildlife corridors, and view opportunities) identified on Figure 4.1-1 were used to determine where the three development categories should be placed on the Project site. The category designations were defined as follows:

High Development Potential:

- No sensitive biological resources or slopes greater than 25%.
- Disturbed land (no native vegetation or sensitive biological resources) with slopes less than 25%.
- Land is not located within the City’s established MHPA.
- Land is located adjacent to existing or planned development and roadways.

Medium Development Potential:

- Most slope gradients are less than 25%.
- Development would logically extend existing development and roadways.
- Development on land would not fragment open space systems.
- Development relating to an extension of the grading for the primary access road.

Low Development Potential:

- Most slope gradients are greater than 25%.

- Contains state or federal listed sensitive, threatened, or endangered species.
- Contains state or federally sensitive habitat.
- Contains vegetation identified as sensitive by the City's MSCP.
- Contains sections of important regional wildlife corridors that should remain in place to ensure free travel and migration of regional fauna.
- Land is located adjacent to planned open space, thus providing the potential to preserve contiguous segments of regional open space systems.
- Land is constrained by overhead or underground utility transmission lines.

The development suitability analysis weighs the individual factors contained within the three categories of development potential listed above and also considers factors such as community facilities and public safety, as required by Council Policy 600-40.

The proposed Precise Plan has been designed to remain consistent with contiguous open space systems. Implementation of the Project would preserve approximately 2,018.5 acres, or 75% of the Precise Plan area, as natural open space, including approximately 70% of the potentially developable portions of the site. Approximately 120.7 acres of the Montecito sub-project site would not be developed, a portion of which would be included in the City's MHPA. The entire 248-acre City of San Diego owned parcel would be retained in open space with the exception of a road crossing, as well as a large portion of the Sycamore Estates sub-project site (1,620.5 acres). Preserved open space would be consistent with contiguous open space systems to the east in the Sycamore Canyon County Open Space Preserve. The Precise Plan's proposed physical site development, land use, circulation, and utilities would occur in the western and central portions of the site, in areas least constrained by sensitive environmental resources. Development proposed in the western portion of the Montecito sub-project site would be characterized as an extension of existing development in the adjacent Scripps Miramar Ranch and Miramar Ranch North communities. The Precise Plan also provides for a public park/school site, which would be centrally located in the development area. As such, the proposed development plan is consistent with surrounding planned and existing development.

As previously mentioned, Council Policy 600-40 sensitive resources include those resources protected under the Resource Protection Ordinance (RPO). Table 4.1-1, *Project-Wide RPO Analysis*, shows the RPO encroachment allowances for the proposed Project. Figure 4.1-4, *RPO Analysis*, shows the proposed limits of grading in relation to that permitted by RPO. Column 1 of Table 4.1-1 (mapped MHPA area and steep slopes) is subtracted from the total Precise Plan area to calculate the area with no sensitive resources (labeled Column 2). The next column of the table provides the percentage of the property with sensitive resources, which is used to establish the maximum encroachment percentage allowance for both developable and exempt areas. The percentage is then used to calculate the maximum encroachment allowance in acres for developable areas (Column 3) and exempt areas (Column 4). The maximum developable area per RPO (next to last column) is then the addition of Columns 2, 3 and the smaller of Columns 4 and 5. In all cases, Column 5 is used because the acreage of actual exempt area encroachment (Column 5) is less than that allowed (Column 4). On a parcel-by-parcel basis, the Montecito sub-project would exceed RPO maximum encroachment allowances, and the Sycamore Estates sub-project and the City of San Diego owned-parcel would develop less acreage than allowed under RPO. Thus, on a project-wide basis, and in accordance with Council Policy

LEGEND

-  HIGH DEVELOPMENT POTENTIAL
-  MODERATE DEVELOPMENT POTENTIAL
-  LOW DEVELOPMENT POTENTIAL

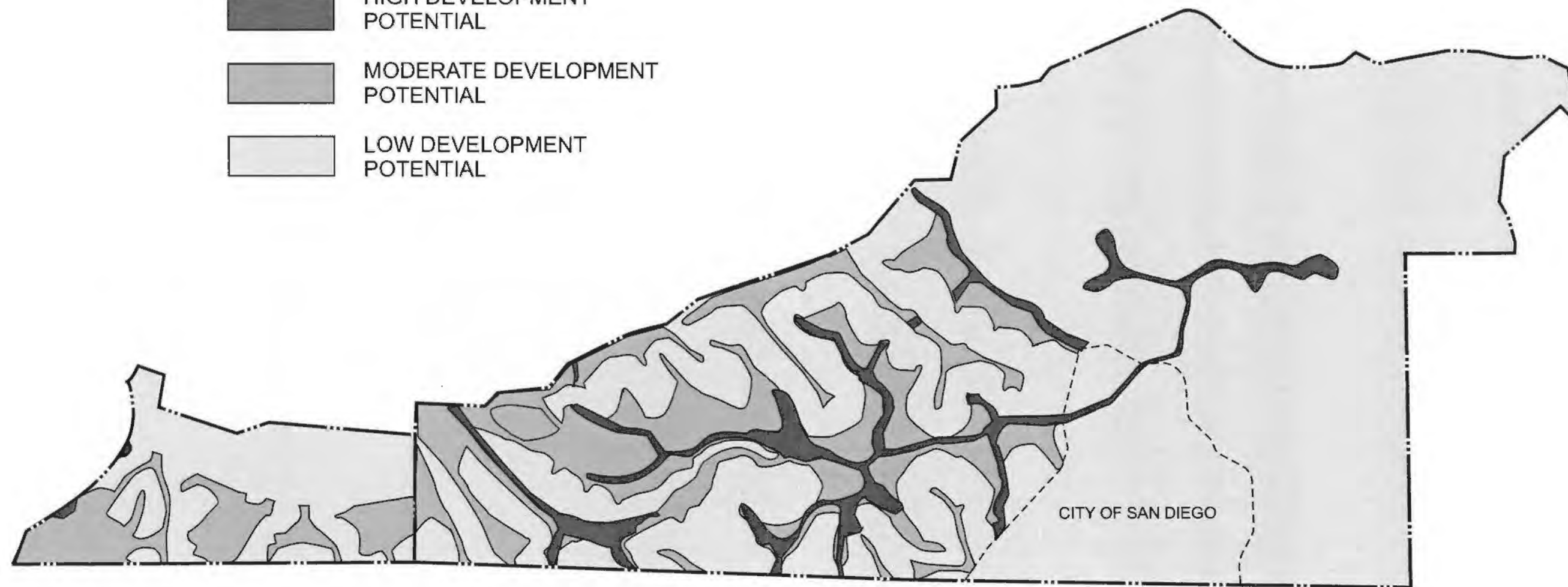
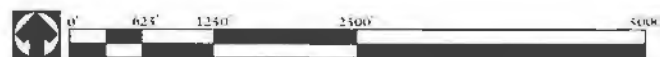


FIGURE 4.1-3
DEVELOPMENT SUITABILITY
ANALYSIS









**Table 4.1-1
PROJECT-WIDE RPO ANALYSIS**

Parcel	Total Area (Acres)	Sensitive Biology/ 25% Slopes (Acres) 1	Area with no Sensitive Biology/ 25% Slopes (Acres) 2	% of Parcel w/Sensitive Biology/25 % slopes	Maximum Encroachment Allowance for:		Maximum Encroachment Allowance for:		Actual Exempt Area (Acres) 5	Maximum Developable Area per RPO (Acres) 2+3+smaller of (4&5)	Proposed Disturbance Area (Acres)
					Developable Area	Exempt Area	Developable Area (Acres) 3	Exempt Area (Acres) 4			
Montecito	278.6	219.4	59.2	78.8	12%	15%	26.3	32.9	25.8	111.3	153.0 ¹
Sycamore Estates	2,132.0	1,864.0	267.4	87.5	16%	15%	298.2	279.6	102.7	668.3	590.0 ²
City of San Diego	248.0	246.8	1.2	99.5	20%	15%	49.4	37.0	5.9	56.5	5.9
TOTAL	2,658	2,330.2	327.8	--	--	--	373.9	349.5	128.5	836.1	748.9



1. RPO encroachment allowance is exceeded on parcel only basis.

1. Although the Sycamore Estates VTM shows 540 acres of disturbance, this EIR evaluates an expanded 590-acre disturbance area as a worst-case scenario to account for potential construction-related impacts.

LEGEND

-  PROJECT BOUNDARY
-  MHPA BOUNDARY
-  EXISTING CONTOURS
-  SLOPE > 25% WITH MINIMUM ELEVATION RISE OF 50'-0"
-  NATURAL FLOOD CHANNEL (WETLAND)
-  WETLANDS

PROPOSED LIMITS OF GRADING

-  R.P.O. DEVELOPABLE AREA ENCROACHMENT
-  R.P.O. EXEMPT AREA ENCROACHMENT

PROJECT-WIDE R.P.O. ANALYSIS

Parcel	Total Area (Acres)	Sensitive Biology/ 25% Slopes (Acres) 1	Area with no Sensitive Biology/25% Slopes (Acres) 2	% of Parcel w/Sensitive Biology/25% slopes	Maximum Encroachment Allowance for:		Actual Exempt Area (Acres) 5	Maximum Developable Area per RPO (Acres) 2+3+smaller of (4&5)	Parcel Developable Area (Acres)		
					Developable Area	Exempt Area					
Montecito	278.6	219.4	59.2	78.8	12%	15%	26.3	32.9	25.8	111.3	153.0*
Sycamore Estates	2,132.0	1,864.0	267.4	87.5	16%	15%	298.2	279.6	102.7	668.3	590.0
City of San Diego	248.0	246.8	1.2	99.5	20%	15%	49.4	37.0	5.9	56.5	5.9
TOTAL	2,658	2,330.2	327.8	--	--	--	373.9	349.5	128.5	836.1	748.9

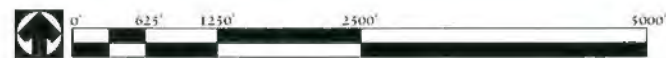


Figure 4.1-4
RPO ANALYSIS

600-40, the proposed Precise Plan would be consistent with RPO encroachment allowances. In the case of long-range plans, such as the proposed *Rancho Encantada* Precise Plan, a RPO permit may be approved using the substantial conformance clause in the alternative compliance provisions of RPO, if the Precise Plan is approved as a long-range plan under Council Policy 600-40. Because wetland impacts would occur, which are not permitted under RPO, alternative compliance findings would be required. These impacts total 0.01-acre on the Montecito sub-project site and 0.53-acre on the Sycamore Estates sub-project site.

Development plans shall, to the maximum extent feasible, comply with the provisions of RPO. A RPO permit may be approved if all of the following findings can be made:

A. *THE PROPOSED DEVELOPMENT WILL NOT ADVERSELY AFFECT THE CITY OF SAN DIEGO'S PROGRESS GUIDE AND GENERAL PLAN;*

Summary of Proposed Finding: An amendment to the City of San Diego Progress Guide and General Plan is required to adopt the *Rancho Encantada* Precise Plan, which would serve to implement the policies of the General Plan. The Progress Guide and General Plan identifies the project site as an "Area for Future Growth" within the Future Urbanizing tier. The proposed Precise Plan is considered part of the Land Use Element of the General Plan so its adoption would be considered an amendment to the General Plan. The Project incorporates mitigation requirements and conditions that ensure compliance with the City's adopted General Plan, as discussed above in this Section (4.1, LAND USE), under Issue No. 1.

B. *THE PROPOSED DEVELOPMENT CONFORMS TO THE ADOPTED COMMUNITY PLAN OF THE AREA AND ANY OTHER APPLICABLE PLANS, POLICIES AND ORDINANCES; AND,*

Summary of Proposed Finding: There currently is no Community Plan applicable to the Property. The *Rancho Encantada* Precise Plan has been prepared for Montecito and Sycamore Estates sub-project sites and a City of San Diego owned parcel and would be adopted concurrently with the proposed Montecito and Sycamore Estates sub-project entitlements by the City. The *Rancho Encantada* Precise Plan would be adopted as part of the Project and would implement, be a part of, and be consistent with the City's General Plan. The Project would be consistent with City of San Diego zoning requirements, Council Policy 600-29, Council Policy 600-40 and the City's MSCP.

C. *THE PROPOSED DEVELOPMENT WILL BE SITED, DESIGNED, CONSTRUCTED AND MAINTAINED TO MINIMIZE, IF NOT PRECLUDE, ADVERSE IMPACTS ON ENVIRONMENTALLY SENSITIVE LANDS.*

Summary of Proposed Finding: The Project conforms to the intent and purpose of RPO by minimizing encroachment into sensitive hillsides and biologically sensitive

lands. Wetland impacts have been minimized to the maximum extent possible, with 0.01-acre of wetland impact occurring on the Montecito sub-project site, 0.53-acre of wetland impact occurring on the Sycamore Estates sub-project site and 0.02-acre of wetland impact occurring for construction of the on-site sewer pump station design option. Portions of the Montecito and Sycamore Estates sub-projects are located within the MHPA, and the Project would expand the MHPA by 348.3 net acres. The existing MHPA within the Montecito sub-project site would be reduced by a total of 15.9 net acres, but the MHPA would be increased by 364.2 acres on the Sycamore Estates sub-project site.

D. THE PROPOSED DEVELOPMENT WILL BE SITED AND DESIGNED TO PREVENT ADVERSE IMPACTS ON ANY ENVIRONMENTALLY SENSITIVE LANDS AND RESOURCES LOCATED IN ADJACENT PARKS AND PUBLIC OPEN-SPACE AREAS AND WILL PROVIDE ADEQUATE BUFFER AREAS TO PROTECT SUCH RESOURCES.

The site is bounded to the west by Pomerado Road and developed communities in the City of San Diego and as such, no environmentally sensitive lands exist to the west. The Beeler Canyon Regional Wildlife Corridor exists to the north in the City of Poway. Given the width of the Beeler Canyon Regional Wildlife Corridor and the addition of open space provided by the Project, this corridor would continue to function effectively as a regional wildlife corridor; impacts would be considered adverse but not significant. Public park lands surround the project site to the east. The Sycamore Canyon County Open Space Preserve, a public park operated by the County of San Diego, is located to the east. The configuration of open space to be retained on the *Rancho Encantada* project site would be consistent with that anticipated in the City of San Diego's adopted MSCP Subarea Plan, and would not significantly impact existing wildlife corridors or adjacent public lands. Overall project design would maintain the integrity of the preserve design mapped in the Final MSCP, City of Poway MSCP, and City of San Diego MSCP plans. The Sycamore Canyon regional wildlife corridor occurs as the eastern edge of the MHPA portion of the site which is planned for open space. Because the Sycamore Estates sub-project would preserve the western portion of the site as open space, no significant impacts would occur.

E. THE PROPOSED DEVELOPMENT WILL MINIMIZE THE ALTERATIONS OF NATURAL LANDFORMS AND WILL NOT RESULT IN UNDUE RISKS FROM GEOLOGICAL AND EROSIONAL FORCES AND/OR FLOOD AND FIRE HAZARDS.

The proposed development would alter existing natural landforms in areas proposed for development, but encroachment allowances would be well below that permitted by RPO. The proposed Project has been designed to minimize alterations of the natural landform through contour grading on a majority of the proposed manufactured slopes. Best Management Practices (BMPs) and City-required brush management would be implemented for erosion control and to reduce the threat of wildfires.

F. FEASIBLE MEASURES AS DEFINED IN THIS SECTION, TO PROTECT AND PRESERVE THE SPECIAL CHARACTER OR THE SPECIAL HISTORICAL, ARCHAEOLOGICAL OR CULTURAL VALUE OF AFFECTED SIGNIFICANT PREHISTORIC SITE OR RESOURCE HAVE BEEN PROVIDED BY THE APPLICANT.

No cultural resource sites are located on the Montecito sub-project site; therefore, development of the sub-project site as proposed would not impact important cultural resources. Eight cultural resources exist on the Sycamore Estates sub-project site, seven of which were found not to be significant and one of which is potentially significant, as it could not be studied due to inaccessibility. This site would be monitored during grading to ensure that no unmitigated impacts would occur. Both sub-project sites exhibit a high paleontological resource sensitivity, and monitoring would occur during grading to reduce potential impacts to below a level of significance.

Significance of Impacts

The Project would be within the encroachment allowances of the Resource Protection Ordinance, but because wetland impacts would occur, impacts would be regarded as significant.

Mitigation Measures, Monitoring and Reporting Program

Wetland impacts would be fully mitigated as disclosed in Section 4.3, BIOLOGICAL RESOURCES. Inconsistency with the RPO due to wetland impacts can be avoided with implementation of the RPO Consistent Alternative discussed in Section 9.0 of this EIR.

Issue 3: How is the proposed project consistent with the City's Multiple Species Conservation Program (MSCP) Subarea Plan?

Significance Criteria

A significant land use impact would occur if the proposed Project is inconsistent with the City's Multiple Species Conservation Program (MSCP) Subarea Plan.

Impact Analysis

Approximately 1,443.5 acres (54 percent), of which 89.5 acres occur on the Montecito sub-project site and 1,106 acres occur on the Sycamore Estates site, would be permanently preserved as part of the City's MHPA. Areas designated as MHPA would be preserved in perpetuity by either conveyance of the MHPA area to the City of San Diego or through the establishment of permanent conservation

easements. The MHPA lines in the City of San Diego's MSCP Subarea Plan were drawn at a regional scale and are expected to be refined in conjunction with project-specific planning efforts. The City of San Diego's MSCP Subarea Plan allows adjustment to the MHPA if the adjustment would result in the same or higher biological value for the preserve. A MHPA boundary adjustment is proposed within the *Rancho Encantada* project site (see Section 4.3, BIOLOGICAL RESOURCES). In summary, the MHPA would be reduced by 15.9 acres on the Montecito sub-project site. On the Sycamore Estates sub-project site, 4.4 acres would be removed from the MHPA. Considering the two sub-projects combined, the MHPA would be increased by 348.3 acres. A detailed description and analysis of the proposed boundary adjustment is included in Section 4.3, BIOLOGICAL RESOURCES.

The proposed MHPA must have equivalent or greater biological functions and values as compared to the adopted MSCP Subarea Plan. As discussed above and in Section 4.3, BIOLOGICAL RESOURCES, there would be an approximate 15.9-acre net loss to the MHPA on the Montecito sub-project site and a 364.2-acre net gain to the MHPA on the Sycamore Estates sub-project site, resulting in a net increase to the MHPA of 348.3 acres. The proposed MHPA would have equivalent biological functions and values as compared to the adopted MSCP Subarea Plan (refer to Section 4.3, BIOLOGICAL RESOURCES), and significant impacts would not occur. If the Montecito sub-project proceeded separately from Sycamore Estates, it would be required to purchase equivalent MHPA area (15.9 acres) off-site to reduce impacts to below a level of significance (see Mitigation Measure 4.3-5 in Section 4.3, BIOLOGICAL RESOURCES).

The Land Use Adjacency (LUA) Guidelines contained in the MSCP Subarea Plan (Section 1.4.3) provide a list of issues to be addressed for projects within or adjacent to the MHPA Preserve. These issues include drainage, toxics, lighting, noise, barriers, invasive and brush management. As discussed below, the proposed Project is consistent with the guidelines:

Drainage and Toxics:

Montecito Sub-Project: Drainage would be directed into storm drain inlets in the street system and discharged at four locations. Three of these outlets would empty into water quality filtration basins and associated detention/infiltration basins, which would detain urban runoff within the individual basin where sediments would settle-out prior to being released into the MHPA. Stored water from these basins would be released to natural drainages which would eventually flow into the MHPA. Water from the fourth outlet would be mechanically filtered before reaching the MHPA. These detention/water quality basins and the mechanical filtering system would improve the water quality of runoff through natural filtering processes. Nevertheless, potentially significant impacts could occur to adjacent sensitive habitat areas due to the release of toxic materials and pesticide/fertilizers contained in urban runoff. Mitigation Measures contained in Section 4.5, HYDROLOGY/WATER QUALITY, would mitigate the Project's water quality impacts to a level below significant, thus reducing the potential impacts to sensitive habitats.

Sycamore Estates Sub-Project: On the Sycamore Estates sub-project site, runoff would not drain into the existing, adjacent MHPA; however, storm water runoff would drain into areas that would be added to the MHPA. Because detention basins and water quality basins would be installed to filter urban runoff, impacts would not be significant.

The closest willowy monardella population occurs approximately 940 feet from the edge of development on the Sycamore Estates sub-project. Impacts have the potential to occur to willowy monardella if drainage is altered significantly from the existing condition where willowy monardella occurs. The sub-project has been designed to direct all urban flows away from the willowy monardella to avoid indirect impacts to this species. As discussed in Section 4.3, BIOLOGICAL RESOURCES, approximately 14 percent of the watershed for the nearest willowy monardella population would be diverted away. Slopes within the off-site willowy monardella's watershed would be seeded and planted with native species, and silt fencing and other erosional control measures such as sand bags or straw wattles would be required to prevent against erosional siltation in the canyon. These features would reduce potential impacts to willowy monardella to below a level of significance.

Lighting: Lighting of Project roadways would be provided in conformance with the City's Street Design Manual. The proposed *Rancho Encantada* Precise Plan and Design Guidelines and Development Standards recommend that the amount and intensity of lighting should be limited to that necessary for safety, security, and to compliment architectural character and that lighting of all areas adjacent to MHPA open space should be shielded and directed away from the MHPA. Adherence to the project's proposed Design Guidelines and Development Standards would eliminate the potential for impacts associated with lighting.

Noise: Potential short-term urban edge effects would be associated with the construction noise occurring adjacent to the MHPA in areas of substantial coastal sage scrub located adjacent to Sycamore Estates' Planning Area 11 and access through the MHPA associated with Planning Area 11. Based on the coastal California gnatcatcher and habitat survey conducted on the project site in 1999, there is limited potential for gnatcatchers to occur within the MHPA. As discussed in Section 4.3, BIOLOGICAL RESOURCES, mitigation for indirect impacts to gnatcatchers during their breeding season (March 1 to August 15) shall be required in the MHPA or within 500 feet of the MHPA. No clearing of gnatcatcher-occupied habitat is allowed within the MHPA during the breeding season (March 1 to August 15). If clearing or grading occurs adjacent to the MHPA during the gnatcatcher breeding season, gnatcatcher surveys shall be conducted in appropriate habitat within 500 feet of the MHPA boundary impacts to the nesting areas avoided. If no gnatcatchers are identified within the MHPA, no additional measures will be required. If present, measures to minimize noise impacts will be required and may include temporary noise walls/berms. If a survey is not conducted and construction is proposed during the gnatcatcher breeding season, gnatcatcher presence will be assumed and a temporary noise wall/berm would be required. Noise levels from construction activities during the gnatcatcher breeding season should not exceed 60 dBA hourly LEQ at the edge of the MHPA or the ambient noise level if noise levels already exceed 60 dBA hourly LEQ. Construction noise in occupied gnatcatcher territories shall be measured after installation of noise attenuation measures and a report on noise levels provided to EAS. If necessary, additional noise attenuation will be required to ensure that gnatcatchers are not subjected to noise levels over 60 dBA.

Barriers: Development areas adjacent to MHPA open space would be required to provide a wall or fence along the MHPA boundary line to minimize disturbance of natural vegetation and to reduce domestic animal predation. In order to avoid visual impacts from MHPA open space, a wall and fencing concept has been included in the Precise Plan for all development boundaries adjacent to open space. Perimeter walls and fences are proposed to have a maximum height of six feet. Installation of

the walls and fences would eliminate the potential for impacts associated with disturbance and predation.

Invasives: Conceptual landscape plans are proposed as part of the Montecito PRD and the Sycamore Estates PRD. These plans call for exterior manufactured slopes to be vegetated with native plant species that are compatible with the existing native vegetation of the site. Compliance with the proposed conceptual landscape plans would avoid any impacts associated with invasive species.

Brush Management: Two Brush Management Plans are proposed as part of the *Rancho Encantada* project, one for the Montecito sub-project's PRD and one for the Sycamore Estates sub-project's PRD. Zone 1 brush management areas would be located on the development pads and outside of the MHPA. In some areas, and consistent with this LUA guideline, Zone 2 would be located in the MHPA upon receiving a brush management easement for maintenance within the easement area.

Grading/Land Development: Manufactured slopes associated with site development would be included within the development footprint and are not proposed to be located within the MHPA.

A MSCP Priority 2 Special Management directive for Beeler Canyon is included in the MSCP Subarea Plan which states: "*Provide educational and awareness programs where existing or proposed residential and industrial uses about the MHPA pursuant to the general adjacency management guidelines. . . .*" In compliance with this directive, the Project applicants have agreed to ensure that educational information will be distributed to home-buyers as part of the Project's CC&R's to heighten environmental awareness and inform residents of appropriate plantings, construction or disturbance into the MHPA boundaries, pet intrusion, fire management, and other adjacency issues.

Also applicable to the project site are MSCP Guidelines C27, C28 and C29. Guideline C27 states that the eastern portion of the Sycamore Estates sub-project site, mapped within the MHPA, should be preserved as open space. The Sycamore Estates sub-project would be consistent with this guideline, as approximately 1,620 acres of open space area would be preserved on Sycamore Estates. Guideline C28 relates to the City of San Diego parcel, indicating that 25% of its land area could be developed. As part of the proposed *Rancho Encantada* project, 100% of the City of San Diego owned parcel is designated for open space preservation within the MHPA, with the exception of a road crossing that is currently outside of the MHPA. Guideline C29 refers to the western portion of the Sycamore Estates sub-project site, stating that development could occur as permitted in accordance with applicable zoning regulations or potential rezoning. Consistent with this guideline, the project proposes to rezone the Sycamore Estates property from AR-1-1, IL-3-1 and IH-2-1 to AR-1-1 and develop portions of the sub-project site's western area with residential uses, two institutional sites, and a school/park site.

Significance of Impacts

The Rancho Encantada Project would be consistent with the MSCP by preserving over 75 percent of the site as open space including nearly all of the on-site area currently located within the MHPA. The overall proposed Project also would be consistent with the MSCP LUA Guidelines, with the inclusion of mitigation measures to bring the Project in conformance with the lighting, noise, barriers, invasives and drainage and toxics guidelines. Accordingly, no significant impacts to the City's MSCP would occur.

Montecito Sub-Project

The MHPA boundary adjustment on the Montecito sub-project site would decrease the size of the MHPA and create impacts considered potentially significant to the habitats. The MHPA adjustment, however, would not significantly impact wildlife movement or management of the MHPA. If the Montecito sub-project was developed independent of the Sycamore Estates sub-project, the MHPA would be reduced by 15.9 acres, resulting in a significant impact. On a Project-wide basis, the MHPA boundary adjustment would be functionally equivalent and impacts would not be significant.

Sycamore Estates Sub-Project

The MHPA boundary adjustment on the Sycamore Estates sub-project site would increase the overall size of the MHPA, while achieving greater biological functions and value than the existing MHPA. There would be no significant impacts to the habitats, wildlife movement, preserve conservation or management of the MHPA. The proposed Project would be consistent with the MHPA guidelines by preserving approximately 75 percent of the site as natural open space.

Mitigation Measures, Mitigation Monitoring and Reporting Requirements

Montecito Sub-Project

In the event the Montecito sub-project was developed independent of the Sycamore Estates sub-project, Mitigation Measure 4.3-5 in Section 4.3, BIOLOGICAL RESOURCES, of this EIR would be implemented to reduce the significant land use impact associated with the MHPA reduction. Implementation of the mitigation measures identified in Sections 4.3, 4.5 and 4.7 would reduce all other potential land use impacts associated with the MSCP to below a level of significance.

Sycamore Estates Sub-Project

Implementation of the mitigation measures identified in Sections 4.3, 4.5 and 4.7 would reduce potential land use impacts associated with the MSCP to below a level of significance.

Issue 4: *How does the proposed project relate to the purpose and intent of Council Policy 600-29, "Maintenance of the Future Urbanizing Area as an Urban Reserve" and Proposition A, "The Managed Growth Initiative," enacted in 1985?*

Significance Criteria

A significant land use impact would occur if the proposed Project is inconsistent with the purpose and intent of Council Policy 600-29.

Impact Analysis

Except for development as permitted under Council Policy 600-29, Proposition A specifies that the existing non-urban land use pattern and character of the Future Urbanizing Area (FUA) should be retained until such time as the City Council and the electorate approve a phase shift reclassifying the land from Future Urbanizing to Planned Urbanizing and a land use plan is adopted. The proposed Project is not proposing a phase shift via a citywide vote per the Managed Growth Initiative, but instead proposes development in accordance with Council Policy 600-29.

Council Policy 600-29 presents four options for limited development in the FUA, one of which is Rural Cluster Development. Under this option, development is permitted at the density permitted by the property's underlying zone, but clustered in order to promote more efficient land utilization and land conservation. The Montecito sub-project site is 278 acres in size and is zoned RS-1-8 (formerly R1-40,000 under the City's pre-2000 Municipal Code), which permits one dwelling unit for every 40,000 square feet of land area (or approximately one acre). In accordance with Council Policy 600-29, a total of 277 single-family units are proposed on the Montecito sub-project site, and one existing residence would be retained in its current location. Development is proposed to be clustered into three development areas, preserving approximately 161.1 acres of the sub-project site in natural open space and revegetated manufactured slopes.

The Sycamore Estates sub-project site is 2,132 acres in size and is proposed to be rezoned to AR-1-1 (formerly A-1-10 under the City's pre-2000 Municipal Code). Council Policy 600-29 allows as one of its four development options, development pursuant to the Planned Residential Development (PRD) regulations at a density not to exceed one dwelling unit per four acres for agriculturally zoned land. Thus, in accordance with Council Policy 600-29, a total of 533 residential units would be permitted if a PRD is utilized on the site (e.g., $2,132 \div 4 = 533$ dwelling units). Additional units would be permitted through the application of a density bonus available with the provision of affordable housing. A twenty-five percent (25%) density bonus is offered with inclusion of no less than twenty percent (20%) of the pre-density bonus units at rates affordable to families earning no more than sixty-five percent (65%) of median area income with a rentability level of sixty percent (60%).

Based upon the use of a PRD for the Sycamore Estates sub-project and by use of a 25% density bonus as described above, the Sycamore Estates sub-project could include as many as 559 market rate units

and 107 affordable units for a total of 666 units. The number of market rate units was calculated as follows: 533 base units plus five percent (5%) of 533 for a total of 559 market rate units. The number of affordable units was calculated as follows: twenty percent (20%) of 533 base units is 107. The proposed Sycamore Estates PRD includes 557 single-family, market-rate units and 106 affordable multi-family units, which is consistent with Council Policy 600-29.

Significance of Impacts

The Montecito and Sycamore Estates sub-projects are consistent with the land use intensities allowed under Council Policy 600-29 and no significant impacts would occur.

Mitigation Measures, Mitigation Monitoring and Reporting Requirements

Impacts would not be significant; therefore, mitigation is not required.

4.2 LANDFORM & VISUAL QUALITY

4.2.1 EXISTING CONDITIONS

□ ON-SITE LANDFORM & COMMUNITY CHARACTER

Existing Landform

The existing landform of the 2,658-acre site is characterized by several narrow divides, v-shaped valley bottoms and steep sided slopes formed by eight (8) ridgelines or portions of ridgelines and 20± crests or knolls that cross the rugged topography of the project site. There is a north-south oriented drainage that drains into Poway Creek just south of the property. As shown in Figure 2-6, *Topographic Map*, in Section 2.0, ENVIRONMENTAL SETTING, elevations on the site range from a high of approximately 1,177 feet above mean sea level (AMSL) in the southeast portion of the Sycamore Estates sub-project site, to a low of approximately 600 feet AMSL in the northwest portion of the Montecito sub-project site. Slopes of the natural hillside terrain typically range from 2:1 (horizontal to vertical) to 4:1. Approximately 66 percent of the site contains slopes with a gradient in excess of 25 percent and a rise of 50 feet or greater.

Existing Vegetative Communities On-Site

Five (5) wetland/riparian and eight (8) upland vegetation communities occur on the project site, in addition to eucalyptus woodland, disturbed, and developed areas. Wetland/riparian habitats consist of riparian scrub, southern willow scrub, mule fat scrub, wet meadow (freshwater seep), and natural flood channel. A road pool was also mapped as a separate habitat due to its potential to support federally listed fairy shrimp species. Upland habitats include coast live oak woodland, native grassland, Diegan coastal sage scrub (including disturbed), Diegan coastal sage scrub/chaparral, chaparral, chamise chaparral (including disturbed), southern mixed chaparral (including disturbed), and non-native grassland. In addition, ephemeral drainages are present on the site, which are defined as unvegetated waters of the U.S. Disturbed areas also are located on the property and include several trails, private roads, fire breaks and industrial use areas. Please refer to Table 4.3-1, *Existing Vegetation Communities*, in Section 4.3, BIOLOGICAL RESOURCES, of this EIR for a listing of the plant communities on-site. Developed areas support no native vegetation and contain man-made structures (or the remnants of these structures) and paved areas such as roadways. There is a total of 72.6 acres of developed area on the Sycamore Estates sub-project site and 2.2 acres on the City of San Diego owned parcel.

Existing On-Site Land Uses

The project site is an irregular-shaped land area consisting of approximately 2,658 acres. Except for private roads, trails, fire breaks, one existing residence, and five existing industrial use areas, a majority of the site is vacant and in open space. Various SDG&E transmission line easements run through the property, containing overhead power lines, poles, and support structures. One existing residence is

located in the northern portion of the Montecito sub-project site and is accessed via a private driveway connecting to Beeler Canyon Road. The Sycamore Estates sub-project site has been owned by General Dynamics since the 1960's, and defense-related manufacturing uses have occurred on a portion of the site since that time. These manufacturing uses occur in five small industrial areas, accessed via Beeler Canyon Road. There are numerous private roads that traverse the sub-project site that lead to the existing buildings (along with lighting of these areas). Two water storage tanks are located on the Sycamore Estates sub-project site, owned privately by General Dynamics. A segment of the California Aqueduct traverses the eastern portion of the Sycamore Estates sub-project site in a north/south alignment.

Surrounding Community Character

Surrounding Built Environment

Land uses surrounding *Rancho Encantada* are shown in Figure 2-4, *Surrounding Land Uses*. On the immediate south is Marine Corps Air Station (MCAS) Miramar, which is currently in open space. This facility is federally owned and operated and covers approximately 24,000 acres, which is divided by I-15. The area west of I-15 supports residential, commercial, administrative, industrial and aviation uses. The area east of I-15, including the portion of MCAS Miramar south of *Rancho Encantada* is used for training purposes. A San Diego Gas and Electric Company (SDG&E) utility substation is located on the MCAS Miramar property, approximately 200 feet south of the project site boundary, and a U.S. Forest Service facility used for vehicle repair and equipment storage is located southeast of the substation.

The northerly edge of the Montecito sub-project site lies at the bottom of Beeler Canyon and twelve ~~several~~ single family residential lots of one-acre to over four acres in size are located in this area. Some of these homes are located in the City of Poway and some are located in the City of San Diego and are accessed via Beeler Canyon Road. A horse ranch of approximately 60 acres is also located in this area along Beeler Canyon Road. North of the project site is Beeler Canyon, which includes Beeler Canyon Road, nine single-family homes on large lots, the Palomar Airport Transit Mix Quarry, Beeler Creek and adjacent open space, and large manufactured slopes associated with industrial and commercial uses further to the north in the South Poway Business Park. The Palomar Transit Quarry is a resource extraction site operated by CalMat. Valley Elementary School, Meadowbrook Middle School, and Rancho Bernardo High School, which serve the project area, are located north of the site in the City of Poway, approximately 2.2 miles, 3.4 miles, and 4.5 miles north of site, respectively.

The western border of the site is formed by Pomerado Road. Immediately west of Pomerado Road, approximately 200 feet from the western project site boundary, is the community of Scripps Miramar Ranch. The community of Miramar Ranch North is located north of Scripps Miramar Ranch, approximately ½-mile from the project site. These communities are predominantly residential in the vicinity of the project site, but also include significant commercial and employment land uses. The nearest public park is Cypress Canyon Park

located in the community of Scripps Miramar Ranch, just west of Pomerado Road, southwest of the project site.

East of the site is the Sycamore Canyon County Open Space Preserve that is managed by the County of San Diego Department of Parks and Recreation. North of the open space preserve are rural residential homes and ranches located in unincorporated San Diego County.

The overall character of the area is that of suburban residential development to the west and rural and/or natural open space to the east, south and immediate north. Few permanent structures exist on-site and in the area, and still fewer of the on-site structures are visible from surrounding public areas (see Figure 4.2-5).

Surrounding Natural Environment

As described above, the project site is bordered by undeveloped natural lands on the north, south, east, and northwest. Exceptions occur to the west where the developed communities of Scripps Miramar Ranch and Miramar Ranch North exist, and in several areas to the north where several residences and rural residences exist in Beeler Canyon, and further to the north within the City of Poway where larger areas of residential and industrial/office park development occur. MCAS Miramar lies to the south and the Sycamore Canyon County Open Space Preserve, which is an open space preserve managed by the County of San Diego, is located to the east. Beeler Canyon lies along the north project site boundary and Sycamore Canyon lies off-site and to the southeast.

The site is a part of and connected with regional and local wildlife corridors and linkages to the east, south and north. The Poway Subarea Habitat Conservation Plan (HCP) defines two regional corridors within its Subarea and surrounding area, of which Beeler Canyon and Sycamore Canyon are a part of both. The project site's location adjacent to large tracts of undeveloped native habitats to the south in MCAS Miramar, to the east in the Sycamore Canyon County Open Space Preserve, and to the north in Beeler Canyon as part of the HCP/NCCP South Poway Cornerstone Lands, link it to numerous possible wildlife corridors. Beeler Canyon is one of the few remaining natural corridors that stretch from the eastern foothills to the Pacific Ocean (via Los Peñasquitos Canyon and the Torrey Pines State Reserve). Sycamore Canyon is a part of a regional north-south corridor from the San Dieguito River area in the north to MCAS Miramar to the south.

Except for a small portion along the southeastern project boundary, the project site is located in the Peñasquitos Watershed, which drains to Los Peñasquitos Lagoon, located approximately 12 miles west of the project site. A high level of urban development exists within the watershed. Under existing conditions, runoff from the project vicinity collects in natural drainage courses and storm drains and eventually discharges to the Lagoon via existing storm drains.

Visual Characteristics

The existing visual character of the site, as viewed from above, is illustrated on Figure 2-4, in Section 2.0, ENVIRONMENTAL SETTING and on Figure 4.2-5 in this Section. As viewed from off-site, the *Rancho Encantada* project site appears as steeply sloping, naturally vegetated hillsides throughout. The project site is visible from existing public rights-of-way, including Pomerado Road to the west and Beeler Canyon Road, Kirkham Way and Scripps Poway Parkway to the north. The site can be seen from open spaces designated as MHPA by the City of San Diego and from public trails within the Sycamore Canyon County Open Space Preserve. The site is also visible from the higher elevations of the southern part of the City of Poway.

From adjoining properties located to the north, west and south, including Pomerado Road, Beeler Canyon Road, Kirkham Way and Scripps Poway Parkway, the *Rancho Encantada* site appears as a series of steep hillsides. The only visible structures on the Project site are an existing residence in the northern portion of the Montecito sub-project site, five existing industrial clusters of buildings owned by General Dynamics, a water tank associated with the General Dynamics facility, and four SDG&E electrical towers and associated powerlines. To illustrate the existing conditions of the property as viewed from nearby public viewing areas, a series of photographs have been taken from eight locations, four viewing the Montecito sub-project site and four viewing the Sycamore Estates sub-project site (see Figure 4-2-5, *Photo Key Map*). These photographs show the project site's visual quality, as described below.

Montecito Sub-Project Vantage Point 1 (Figure 4.2-6)

Vantage Point 1 depicts a view of the Montecito sub-project site looking east from the intersection of Pomerado Road with Spring Canyon Road and Cypress Canyon Park Drive, across the project site. From this location, the varied topography of the sub-project site can be seen. From Pomerado Road, the topography of the site drops off into a valley and rises again to the east, forming a ridge top. Disturbed habitat is seen in the foreground of the photograph, adjacent to the Pomerado Road/Spring Canyon Road/Cypress Canyon Park Drive intersection. Beyond this disturbed area, the property appears as relatively undisturbed, primarily covered with chaparral habitat. The higher elevations of the Montecito sub-project site are visible, and beyond the sub-project site, higher elevations of the City of Poway are visible along the horizon.

Montecito Sub-Project Vantage Point 2 (Figure 4.2-7)

Vantage Point 2 is taken from the "T" intersection of Pomerado Road and Legacy Road looking east across the project site. From this location, the westernmost portion of the Montecito sub-project site can be seen. In the center of the photo, which is the western portion of the sub-project site, the Pomerado/Legacy Road intersection is visible. The portion of the site that can be seen on the subject property is undisturbed habitat consisting of mixed chaparral, coastal sage scrub, clusters of nonnative Eucalyptus trees and nonnative grassland. Lower elevations of the property, which abut the east side of Pomerado Road, cannot be seen from this location because these elevations are below the grade of the roadway.

Montecito Sub-Project Vantage Point 3 (Figure 4.2-8)

Vantage Point 3 shows the northern portion of the Montecito sub-project site looking southwest from Beeler Canyon Road. This area consists of undisturbed vegetation, mostly southern mixed chaparral. In the left-hand side and center of the photograph, portions of the community of Scripps Miramar Ranch can be observed. The foreground of the photo shows disturbed vegetation in the southern portion of the City of Poway. None of the adjacent Sycamore Estates sub-project site is seen in this photo.

Montecito Sub-Project Vantage Point 4 (Figure 4.2-9)

Vantage Point 4 shows the Montecito sub-project site from the terminus of Sikes Place at Kirkham Way in the City of Poway looking south onto the Montecito property. The on-site ridge and canyon formation topography can be seen in this photo. Mostly undisturbed habitat that is primarily chaparral and coastal sage scrub, can be seen as covering the property. In the photo's background, an existing on-site water tower can be seen, which is part of the existing General Dynamics facility. The area to the left of the sub-project boundary, shows the adjacent Sycamore Estates sub-project site.

Sycamore Estates Sub-Project Vantage Point 5 (Figure 4.2-10)

Vantage Point 5 shows a view toward the northern portion of the Sycamore Estates sub-project site looking to the south from a new road in the South Poway Business Park, located south of and below Kirkham Way. From this vantage point, power lines that traverse the northern portion of the Sycamore Estates sub-project site can be seen in the background on the left side of the photo. Slightly left of the center of the photo, an existing water tank associated with the General Dynamics facilities can be seen. The foreground of the photo shows construction activity associated with the South Poway Business Park, while the background shows the Sycamore Estates property as containing undisturbed vegetation, including Diegan coastal sage scrub and chaparral.

Sycamore Estates Sub-Project Vantage Point 6 (Figure 4.2-11)

Vantage Point 6 shows a view across the Sycamore Estates sub-project site looking in a southwesterly direction, from a new road in the South Poway Business Park located south of Scripps Poway Parkway. The foreground of the photo depicts land in the South Poway Business Park that has been cleared of all vegetation and graded relatively level. The far ground shows several dirt roads/fire breaks, rolling terrain, and areas of undisturbed Diegan coastal sage scrub and chaparral vegetation of the proposed Project site.

Sycamore Estates Sub-Project Vantage Point 7 (Figure 4.2-12)

Vantage Point 7 shows the Sycamore Estates sub-project site looking westward from the confluence of a dirt road and dirt pedestrian/equestrian trail within the Sycamore Canyon County Open Space Preserve/Gooden Ranch. The foreground area visible in the photo has been disturbed in the recent past and contains disturbed vegetation. The photo's middle-ground and background depict the rolling hills

that visually dominate the project site. These hills are vegetated with Diegan coastal sage scrub and chaparral.

Sycamore Estates Sub-Project Vantage Point 8 (Figure 4.2-12)

Vantage Point 8 shows the Sycamore Estates sub-project site from the Sycamore Canyon County Open Space Preserve/Gooden Ranch looking westerly across the project site. In the foreground, the land has been graded and is mostly unvegetated, with patches of disturbed vegetation. A low rail fence runs along the property line. On the left-hand side of the photo, there is a slope on which Diegan coastal sage scrub and chaparral grow. In the background, the rolling topography and hills of Sycamore Estates that are visible retain their natural vegetation.

4.2.2 IMPACT ANALYSIS

Issue 1: How would development of the proposed project alter the existing topography?

Significance Criteria

The criteria to determine if projects would significantly alter the natural (or naturalized) landform, include the following:

- a. The project would alter more than 2,000 cubic yards of earth per graded acre by excavation or fill. Grading of a smaller amount may still be considered significant in highly scenic or environmentally sensitive areas. In addition, one or more of the following conditions (b-d) must apply to meet this significance threshold.
- b. The project would disturb steep (25 percent gradient or steeper) sensitive slopes in excess of the encroachment allowances of the Resource Protection Ordinance or the Coastal Hillside Review zone.
- c. The project would create manufactured slopes higher than ten feet or steeper than 2:1 (50 percent).
- d. The project would result in a change in elevation of steep natural slopes (25 percent gradient or steeper) from existing grade to proposed grade of more than five feet by either excavation or fill, unless the area over which excavation or fill would exceed five feet is only at isolated points on the site.

However, the above conditions items 'a' through 'd' may not be considered significant if one or more of the following apply:

- 1) The proposed grading plans clearly demonstrate, with both spot elevations and contours, that the proposed landforms will very closely imitate the existing on-site landform and/or that of the undisturbed, pre-existing surrounding neighborhood landforms. This may be achieved through “naturalized” variable slopes.
- 2) The proposed grading plans clearly demonstrate, with both spot elevations and contours, that the proposed slopes follow the natural existing landform and at no point vary more than 1½ feet from the natural landform elevations.
- 3) The proposed excavation or fill is necessary to permit installation of alternative design features such as step-down or detached buildings, non-typical roadway or parking lot design, small retaining walls, and alternative wall design which reduce the project’s overall grading requirements.

Impact Analysis

□ PRECISE PLAN GRADING EVALUATION

Implementation of the proposed Precise Plan (as well as the Montecito and Sycamore Estates sub-projects analyzed below) would significantly alter the existing landform in areas proposed for development. The relatively undisturbed character of these areas would be replaced by residential development areas and a public park/school site.

The *Rancho Encantada* Precise Plan includes a Conceptual Grading Plan. Implementation of the grading concept would create flat or gently sloping landforms in the locations identified for development. Figure 4.2-1, *Precise Plan Conceptual Grading Plan*, shows the areas proposed to be graded and the resulting landforms for the Precise Plan area.

The Precise Plan’s Conceptual Grading Plan proposes disturbance of approximately 743 acres, including all disturbance areas for detention basins and utility improvements. The proposed grading would result in a balanced grading operation of approximately 18.5 million cubic yards of cut and 18.5 million cubic yards of fill. Approximately 547 acres of the 743 acres proposed for disturbance would affect slopes with an average gradient above 25 percent and a height differential of 50 feet or more. Using the proposed grading quantity of 18.5 million cubic yards, an overall average grading quantity of 24,899 cubic yards per acre results, which exceeds the significant threshold of 2,000 cubic yards of grading per developed acre. Therefore, implementation of the Precise Plan’s Conceptual Grading Plan would result in a significant impact to landform alteration associated with grading. A grading summary is provided below in Table 4.2-1, *Grading Evaluation*.

LEGEND

MANUFACTURED SLOPES
OVER 10 FEET IN HEIGHT

① - ⑥⑩

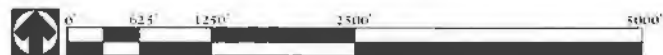
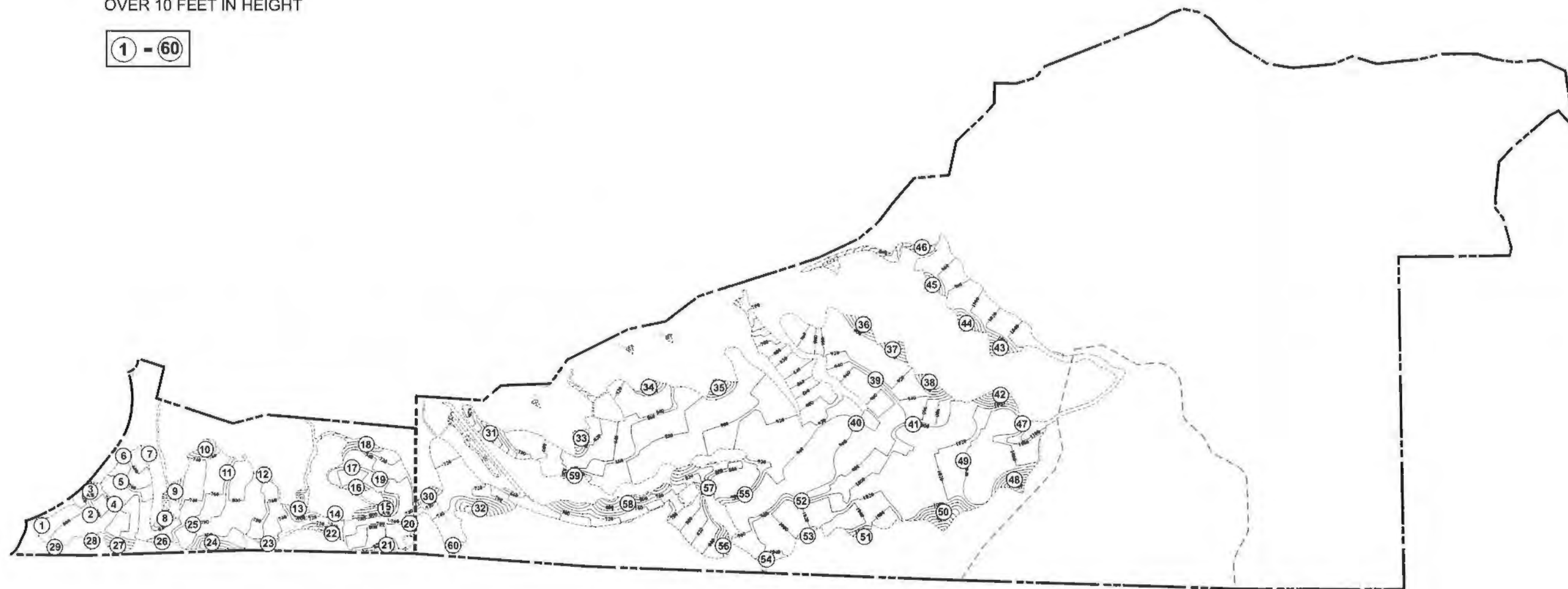


Figure 4.2-1
GRADING PLAN

**Table 4.2-1
GRADING EVALUATION**

Sub-Project	Cut (in cubic yards)	Fill (in cubic yards)	Graded Acres	CY per Graded Acre
Montecito	3,600,000	3,600,000	153.0	23,529
Sycamore Estates	14,900,000	14,900,000	590.0 ²	25,255
City of San Diego ¹	0	0	0	0
Precise Plan Total	18,500,000	18,500,000	743.0	24,899

1. A nominal amount of grading would occur on the City of San Diego-owned parcel due to road improvements.
2. Although the Sycamore Estates VTM shows 540 acres of disturbance, this EIR evaluates an expanded 590-acre disturbance area as a worst-case scenario to account for potential construction-related impacts.

PRECISE PLAN SLOPE EVALUATION

Proposed manufactured slopes which would exceed 10 feet in height are numbered 1 - 60 on Figure 4.2-1, *Precise Plan Conceptual Grading Plan*. Table 4.2-2, *Manufactured Slope Summary*, tabulates the maximum height of the proposed manufactured slopes shown on Figure 4.2-1. As shown, by this table, the maximum height of the proposed manufactured slopes would be approximately 240 feet. Exterior manufactured slopes would be representative in height to the natural hillside topography of the project site. All manufactured slopes would have a maximum gradient of 2:1. Because implementation of the Precise Plan would result in the creation of manufactured slopes higher than ten feet and would result in a change in elevation of steep natural slopes (25 percent gradient or steeper) from existing grade to proposed grade of more than five feet by either excavation or fill, landform alteration impacts would be regarded as significant.

**Table 4.2-2
MANUFACTURED SLOPE SUMMARY**

SLOPE NUMBER	MAXIMUM SLOPE HEIGHT	SLOPE LENGTH	SLOPE NUMBER	MAXIMUM SLOPE HEIGHT	SLOPE LENGTH
MONTECITO SUB-PROJECT					
1	45'	260'	15B	75'	700'
2	25'	500'	16	80'	600'
3A	70'	580'	17	70'	1,800'
3B	50'	300'	18	110'	890'
4	40'	650'	19	35'	370'

SLOPE NUMBER	MAXIMUM SLOPE HEIGHT	SLOPE LENGTH	SLOPE NUMBER	MAXIMUM SLOPE HEIGHT	SLOPE LENGTH
5	35'	540'	20	60'	950'
6	30'	420'	21	85'	850'
7	75'	420'	22	105'	770'
8	105'	600'	23	65'	650'
9	115'	650'	24	85'	1,160'
10	75'	580'	25	55'	1,000'
11	60'	960'	26	80'	800'
12	115'	450'	27	125'	500'
13	120'	840'	28	65'	260'
14	55'	250'	29	25'	380'
15A	75'	75'	30	75'	550'
SYCAMORE ESTATES SUB-PROJECT					
31	175'	1,320'	45	145'	720'
32	70'	640'	46	85'	600'
33	135'	680'	47	55'	550'
34	145'	620'	48	205'	1,170'
35	150'	700'	49	40'	820'
36	150'	790'	50	205'	1,520'
37	135'	600'	51	130'	550'
38	195'	950'	52	70'	1,750'
39	60'	1,420'	53	100'	560'
40	50'	900'	54	65'	400'
41	45'	875'	55	65'	920'
42	170'	900'	58	145'	2,930'
43	180'	650'	59	165'	1,420'
44	160'	710'	60	60'	370'

As components of the proposed Project, VTMs are proposed for the Montecito and Sycamore Estates sub-projects. Provided below is an evaluation of potential landform alteration impacts that could result from implementation of these sub-projects which are proposed to implement the Precise Plan.

□ MONTECITO SUB-PROJECT VTM GRADING AND SLOPE EVALUATION

The Montecito VTM would result in grading of approximately 153 acres of the 278-acre site. The property includes approximately 199.6 acres of natural slopes exceeding a gradient of 25 percent and a rise of 50 feet, approximately 112.9 acres of which would be graded. Implementation of the VTM would create flat and gently sloping development pads for 277 single family lots and would retain one existing single-family home in its current location. The northern portion of the site would be preserved in open space.

Grading Evaluation

Of the 278-acre Montecito sub-project site, approximately 153 acres are proposed to be graded. Grading would be balanced on-site, with approximately 3.6 million cubic yards of cut and 3.6 million cubic yards of fill. Applying the proposed earthwork quantity over an approximate 153-acre disturbance area would result in an overall grading average of approximately 23,529 cubic yards per graded acre. This quantity would exceed 2,000 cubic yards of grading per developed acre and would result in a significant impact associated with grading.

Slope Evaluation

Figure 4.2-2, *Montecito VTM Manufactured Slopes*, shows the resulting landform that would occur with implementation of grading proposed by the Montecito VTM. Manufactured slopes in excess of 10 feet in height are numbered 1-30 on this exhibit, which correspond to the slope height and length information contained in Table 4.2-2. The numbered slopes indicate on-site slopes necessary to accommodate the construction of flat and gently sloping residential lots and appropriate project roadway grades. All manufactured slopes would have a maximum gradient of 2:1. Landform alteration impacts would be significant because the sub-project would result in the creation of manufactured slopes higher than ten feet and would result in a change in elevation of steep natural slopes (25 percent gradient or steeper) from existing grade to proposed grade of more than five feet.

□ SYCAMORE ESTATES SUB-PROJECT VESTING TENTATIVE MAP (VTM)

The Sycamore Estates VTM would result in grading of 540 acres of the 2,132-acre sub-project site; however, this EIR analyzes a 590-acre disturbance area to account for potential construction-related impacts. The property includes approximately 1,542.7 acres of natural slopes exceeding a gradient of 25 percent and a rise of 50 feet, approximately 380 acres of which would be graded. Implementation of the VTM would create flat and gently sloping development pads for 557 single family lots, one multi-family lot, two institutional lots and a school/park site. The eastern portions of the sub-project site, as well as the open space areas surrounding the development pads in the western portion of the site, would be preserved in open space as part of the City's MHPA.

Grading Evaluation

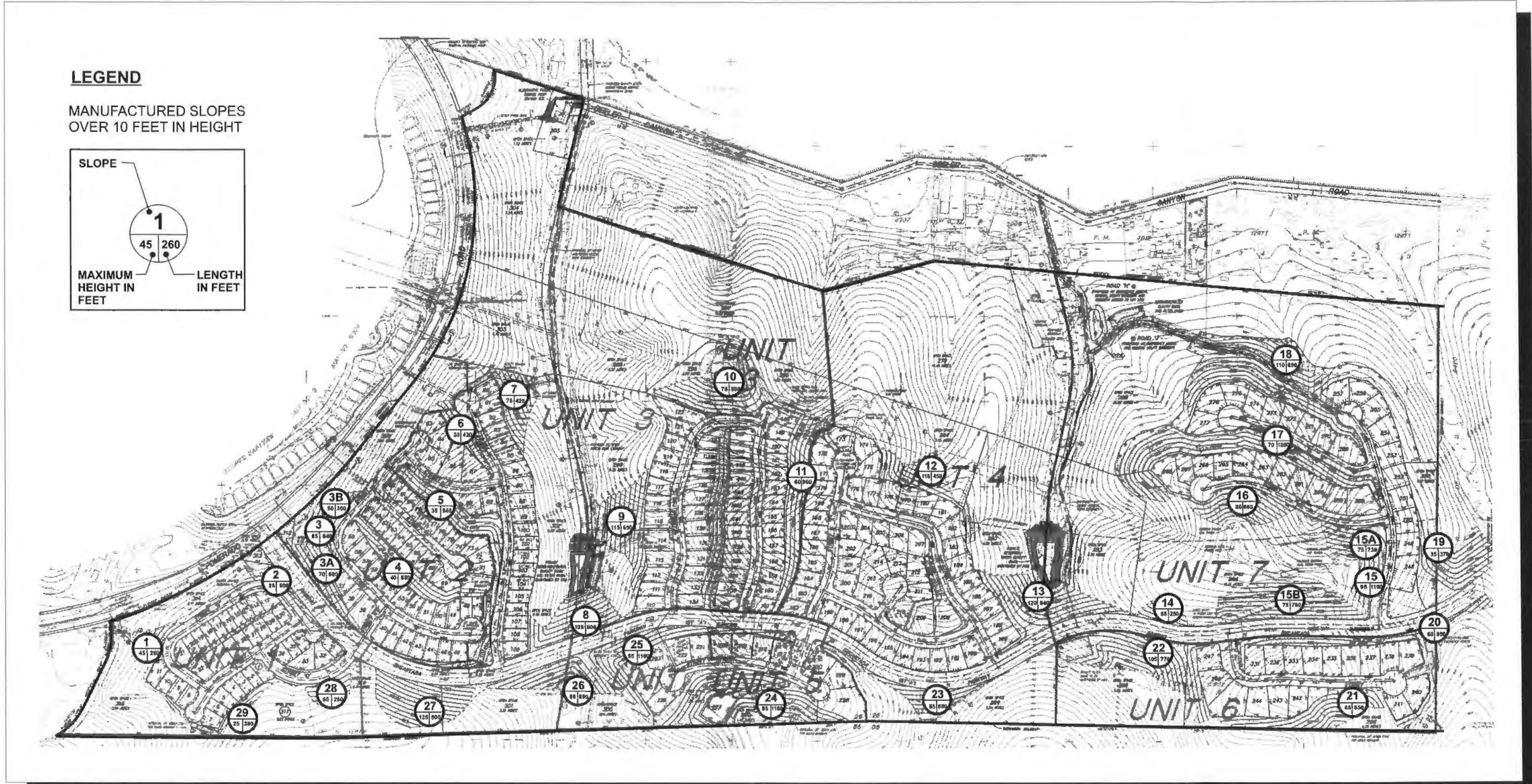
Of the 2,132-acre Sycamore Estates sub-project site, approximately 590 acres are proposed to be graded. Grading would be balanced on-site, with approximately 14.9 million cubic yards of cut and 14.9 million cubic yards of fill, with a net of zero cubic yards of import or export. Limited amounts of import or export, however, may be necessary based on final engineering of the site. Applying the proposed earthwork quantity over an approximate 590-acre disturbance area would result in an overall grading average of approximately 25,255 cubic yards per graded acre. This quantity would exceed the significance threshold of 2,000 cubic yards of grading per developed acre and would result in a significant impact associated with grading.

Slope Evaluation

Figure 4.2-3, *Sycamore Estates VTM Manufactured Slopes*, shows the resulting landform that would occur with implementation of grading proposed by the Sycamore Estates VTM. Manufactured slopes in excess of 10 feet in height are numbered 31 - 60 on this exhibit, which correspond to the slope height and length information contained in Table 4.2-2. The numbered slopes indicate on-site slopes necessary to accommodate the construction of flat and gently sloping residential lots, the multi-family development pad, institutional sites, the school/park site, and appropriate project roadway grades. All manufactured slopes would have a maximum gradient of 2:1 and the heights of exterior manufactured slopes would be representative of natural slope heights of the site's existing topography. Landform alteration impacts would be significant because the sub-project would result in the creation of manufactured slopes higher than ten feet and would result in a change in elevation of steep natural slopes (25 percent gradient or steeper) from existing grade to proposed grade of more than five feet.

Rancho Encantada Parkway Grading and Slope Evaluation

If the Sycamore Estates sub-project of the overall *Rancho Encantada* project develops prior to development of the Montecito sub-project, it may be necessary for the developers of Sycamore Estates to construct Rancho Encantada Parkway across the Montecito sub-project site to gain access. In this case, grading and construction of Rancho Encantada Parkway across the Montecito sub-project site would be regarded as an off-site improvement of the Sycamore Estates VTM. Additional grading necessary to construct Rancho Encantada Parkway across the Montecito site would entail disturbance of approximately 38 acres, with 76,500 cubic yards of cut and 1,145,000 cubic yards of fill. Fill would be generated by an adjustment in the pad elevations on the Sycamore Estates sub-project site, so that overall earthwork quantities would balance. In other words, the elevations of the Sycamore Estates development areas would be lowered by approximately one inch over the entire disturbance area. Applying the larger earthwork quantity over an approximate 38-acre disturbance area would result in an additional grading average of approximately 30,131 cubic yards per graded acre for development of the roadway. This quantity would also exceed the significance threshold of 2,000 cubic yards of grading per developed acre and would result in a significant landform alteration impact associated with grading.



SOURCE: NOLTE ASSOCIATES INC.

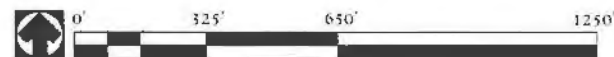
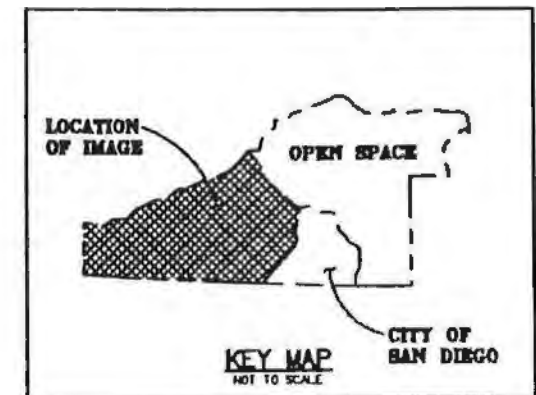
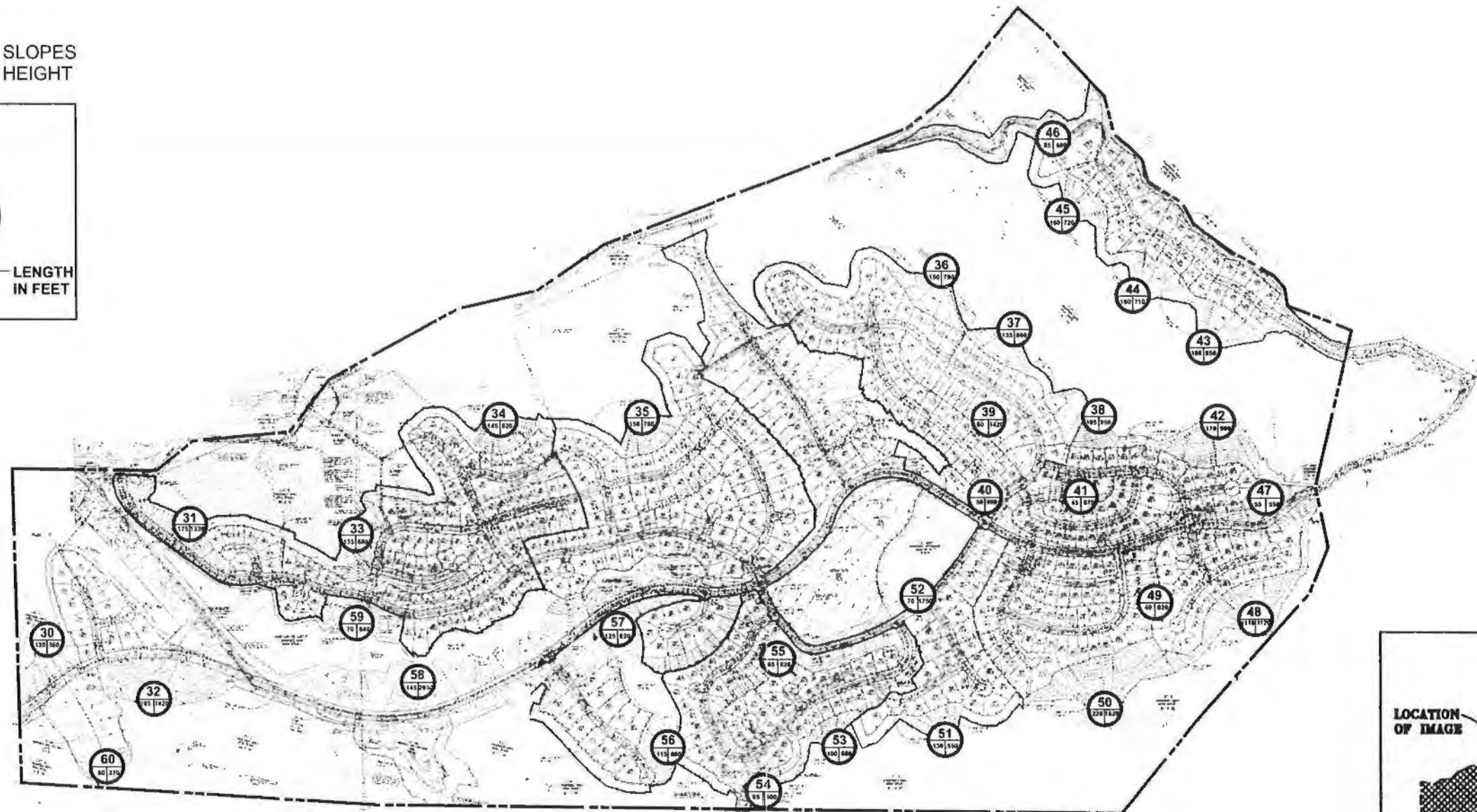
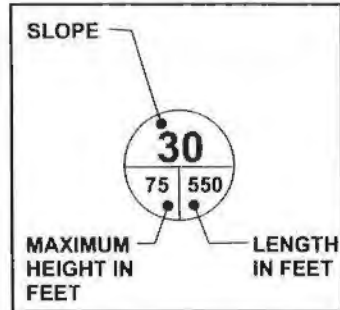


Figure 4.2-2
MONTECITO VTM
MANUFACTURED SLOPES

LEGEND

MANUFACTURED SLOPES
OVER 10 FEET IN HEIGHT



SOURCE: ROBERT BEIN, WILLIAM FROST & ASSOCIATES

Figure 4.2-3
SYCAMORE ESTATES VTM
MANUFACTURED SLOPES



Temporary manufactured slopes that would occur on the Montecito sub-project site as a result of the Sycamore Estates off-site road improvement are numbered below in Table 4.2-3, *Rancho Encantada Parkway Temporary Manufactured Slope Summary* and are shown in Figure 4.2-4, *Temporary Manufactured Slopes of the Sycamore Estates VTM*. These manufactured slopes would have a maximum gradient of 2:1, would be temporary in nature and would be within the development footprint of the Project as proposed. With development of the Montecito sub-project these slopes would be regraded as shown previously in Figure 4.2-7 (with the exception of slopes 13, 14 and 19 shown on Figure 4.2-3). Landform alteration impacts would be significant because construction of the roadway would result in the creation of manufactured slopes higher than ten feet and would result in a change in elevation of steep natural slopes (25 percent gradient or steeper) from existing grade to proposed grade of more than five feet.

Table 4.2-3

RANCHO ENCANTADA PARKWAY TEMPORARY MANUFACTURED SLOPE SUMMARY

(Would occur as an off-site improvement required of the Sycamore Estates VTM if the Sycamore Estates sub-project develops prior to development of the Montecito sub-project)

SLOPE NUMBER	MAXIMUM SLOPE HEIGHT	SLOPE LENGTH	SLOPE NUMBER	MAXIMUM SLOPE HEIGHT	SLOPE LENGTH
1	170'	710'	11	50'	240'
2	105'	690'	12	115'	570'
3	95'	460'	13	110'	1,110'
4	30'	330'	14	85'	600'
5	105'	400'	15	80'	480'
6	70'	540'	16	30'	240'
7	130'	1,200'	17	90'	450'
8	45'	250'	18	70'	710'
9	80'	600'	19 ¹	130'	500'
10	70'	300'	20	110'	780'

1. Slopes 13, 14 and 19 would be permanent because they would not be disturbed with implementation of the Montecito sub-project.

□ **OFF-SITE GRAVITY SEWER DESIGN OPTION**

As a design option of the proposed Project, a gravity sewer line would be constructed in the City of Poway. The line would be located underground and the ground surface would be restored to its existing condition. As such, no landform alteration impacts would occur.

Significance of Impacts

Implementation of the *Rancho Encantada* project would result in significant direct and cumulative landform alteration and grading impacts. Refer to Section 5.0, CUMULATIVE EFFECTS, for a discussion of cumulative Project impacts.

Mitigation Measures, Monitoring and Reporting Program

The measures listed below would reduce the Project's significant direct and cumulative landform alteration impact, but not to below a level of significance. Only adoption of the Reduced Project, Reduced Grading, or RPO Consistent Alternative (refer to Section 9.0 of this EIR) would avoid or further reduce the significant cumulative and direct landform alteration and grading impacts of the proposed Project.

Montecito Sub-Project

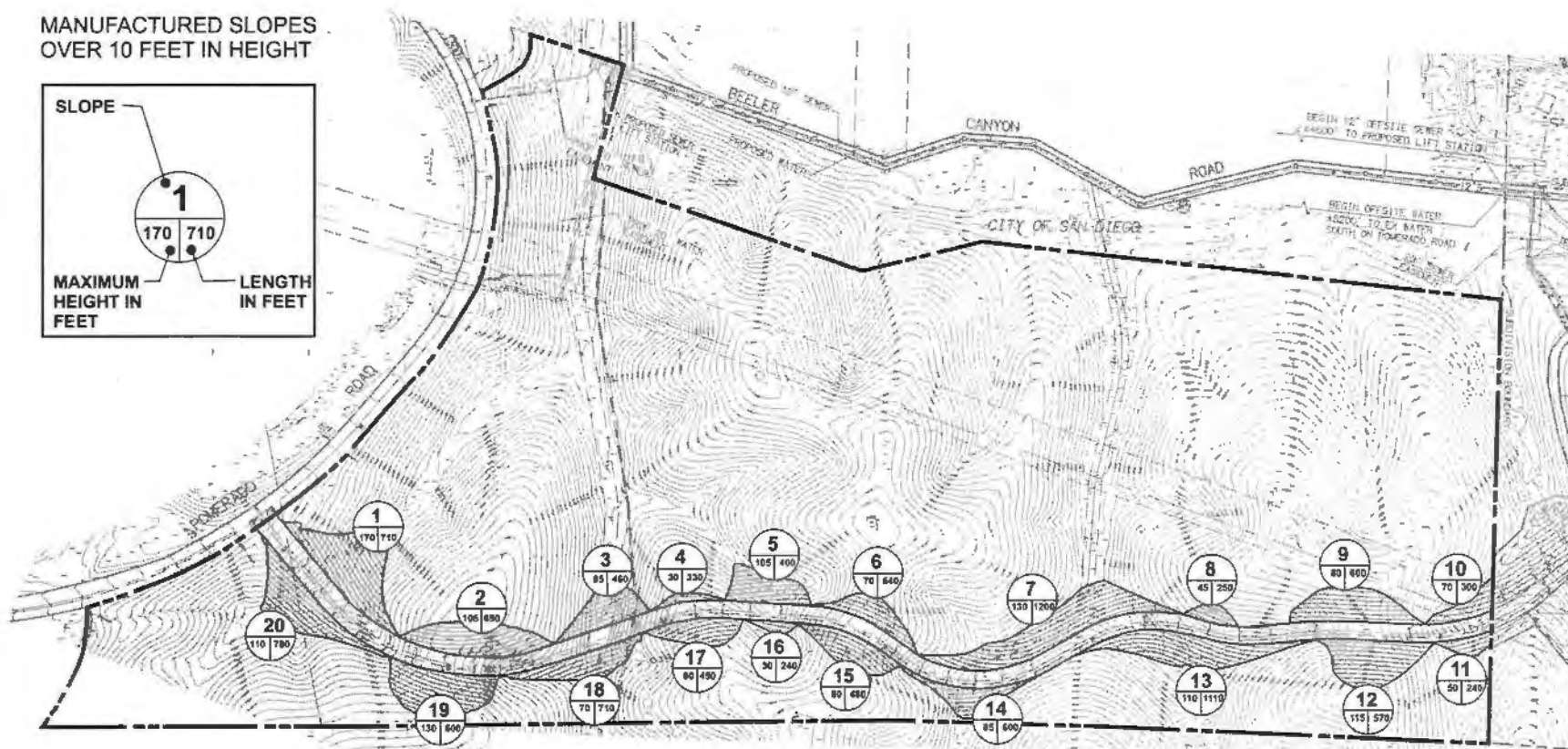
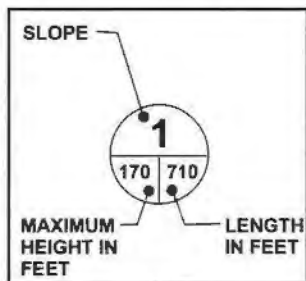
4.2-1: Prior to the issuance of grading permits, the City of San Diego's Planning and Development Review Department shall review final maps and grading plans to verify implementation of contour grading of manufactured slopes with the exception of slope numbers 1, 2, 3, 22, 23 and 26 (refer to Figure 4.2-2), as shown on the Exhibit A grading plans. City field inspectors shall inspect the grading to ensure conformance with approved grading plans prior to the issuance of certificates of occupancy.

Sycamore Estates Sub-Project

4.2-2: Prior to the issuance of grading permits, the City of San Diego's Planning and Development Review Department shall review final maps and grading plans to verify implementation of contour grading of manufactured slopes with the exception of slope numbers 32, 39, 40, 41, 47, 49, 51, 52, 53, 54, 55, 56, 57 and 60 (refer to Figure 4.2-3), as shown on the Exhibit A grading plans. City field inspectors shall inspect the grading to ensure conformance with approved grading plans prior to the issuance of certificates of occupancy.

LEGEND

MANUFACTURED SLOPES
OVER 10 FEET IN HEIGHT



**Figure 4.2-4
TEMPORARY MANUFACTURED SLOPES
OF THE SYCAMORE ESTATES VTM**



Issue 2: *How would the project affect the visual quality of the area, particularly with respect to views from major roadways and public viewing areas?*

Significance Criteria

The criteria identified below are used in this EIR to determine potential impacts to visual quality. Impacts are regarded as significant for projects that would meet one or more of the following criteria:

- a. Projects that would block public views from designated open space, roads, or parks to significant visual landmarks or scenic vistas. To meet this significance threshold, one or more of the following conditions must apply:
 - The project would substantially block a view through a designated public view corridor as shown in the General Plan. Minor view blockages would not be considered to meet this condition.
 - The project would cause substantial view blockage of a significant public resource (such as the ocean, downtown skyline, mountains, waterways, etc.).
 - The project exceeds the allowed height or bulk regulations, and this excess causes unnecessary view blockage.
 - The project would have a cumulative effect by opening up a new area for development, which will ultimately cause ‘extensive’ view blockage. (Cumulative effects are usually considered significant for a community plan analysis, but not necessarily for individual projects.) View blockage would be considered ‘excessive’ when the overall scenic quality of a resource is changed; for example, from an essentially natural view to a largely man-made appearance.
- b. Projects that severely contrast with the surrounding neighborhood character.
- c. Projects that have a negative visual appearance. To meet this significance threshold, one or more of the following conditions must apply:
 - The project includes crib, retaining, or noise walls greater than six feet in height and 50 feet in length with minimal landscape screening or berming where the walls would be visible to the public.
 - The project is large (greater than 100 acres) and would result in an exceedingly monotonous visual environment (e.g., a large subdivision in which all the units are virtually identical).

- The project proposes mass terracing of natural slopes with cut or fill slopes in excess of 5 feet in order to construct flat-pad, single-level structures.

Impact Analysis

PRECISE PLAN

The visual quality of the Project can be evaluated through several objective comparisons of the existing site conditions to those that would be in place after development is completed. With implementation of the proposed Precise Plan, views of the project site would change from that of a rural, primarily undeveloped area with canyons and ridgelines supporting native and non-native habitats to that of a residential community consisting of 12 gently sloping planning areas surrounded by natural and revegetated slopes. At buildout of the Project, views of the site from Pomerado Road would change from that of naturally vegetated canyons and ridgelines containing private roads, trails, power lines, one existing single-family residence and five industrial use areas (which are not visible from Pomerado Road), to that of 12 distinctly flat or gently sloping planning areas containing a residential neighborhood in the southern and western portions of the project site, surrounded by permanently preserved open space to the north and MCAS Miramar to the south. The *Rancho Encantada* development area would be viewed as a continuation of urbanization similar in neighborhood character to the adjacent Scripps Miramar Ranch and Miramar Ranch North communities to the west.

As discussed below under the Montecito and Sycamore Estates sub-projects, development of the site as proposed would not contrast with the surrounding neighborhood character. The Project would, however, result in view blockage to open space and would have a significant visual appearance because the development areas of the Project total more than 100 acres and would be viewed as a large subdivision of residential units having a similar appearance. Although the Project proposes to grade the site to conform with the site's existing topographic character, mass grading would occur that would result in cut or fill slopes in excess of 5 feet in height order to construct flat and gently sloping development pads. Therefore, impacts would be regarded as a significant direct impact. Cumulative visual quality impacts also would be considered significant because the Project would change views of the site from an essentially natural view to a man-made appearance (see Section 5.0, CUMULATIVE EFFECTS).

MONTECITO SUB-PROJECT PRD/VTM

The proposed Montecito sub-project would introduce 277 single family homes to the Montecito site, while retaining one existing single family residence in its current location. The Montecito development pads are proposed in the southern portions of the property. No specific architectural elevations are proposed as part of the sub-project's PRD Permit; however, Design Guidelines and Development Standards are proposed to guide development of Montecito's residential uses. As stipulated by the proposed guidelines, elevations of structures visible from public open spaces, including the MHPA, are proposed to be articulated with projections, recesses, windows, doors and/or specialized architectural detailing. Unarticulated exterior walls would be prohibited in areas visible from public streets or open spaces. From a distance, homes would be seen in the higher elevations of

the development areas, with the most visible portions of the homes being the rear elevations at the top of proposed manufactured slopes. From a distance, the architectural detail and setback variations would not be readily discernable, resulting in a perceived monotonous pattern, which is regarded as a significant visual quality impact pursuant to criterion c. Developed areas in the lower elevations of the site would not be highly visible. Landscaping would occur on individual residential lots and along all internal project roadways. All manufactured slopes would be revegetated with native or naturalized plant material. A traffic signal would be constructed at the Rancho Encantada Parkway and Pomerado Road intersection. The traffic signal is required for pedestrian and vehicular safety, and is not considered visually intrusive.

The proposed Montecito VTM proposes retaining walls in three areas. A 22-foot high retaining wall is proposed along a length of approximately 100 feet on the south side of Rancho Encantada Parkway to reduce impacts to wetland vegetation and to provide a 25-foot natural buffer for an existing wetland. This wall would not be visible from public viewing areas; therefore, significant visual impacts due to wall construction would not occur. The Montecito VTM also proposes retaining walls between residential lots, but these walls would be less than six feet in height and would not create a significant visual quality impact. Thirdly, retaining walls would occur along the east side of a proposed utility access road and would range from six to 11 feet in height. These walls would be longer than 50 feet in length, thereby resulting in a potentially significant visual quality impact pursuant to criterion c. The placement of walls along the utility access road are required by the City of San Diego in order to limit slope gradients to no steeper than 2:1 while minimizing impacts to sensitive biological resources in the MHPA. Because the utility access road would be located at a low site elevation, these walls would not be highly visible from public viewing areas due to intervening topography; thus, visual quality impacts due to retaining wall construction would not be regarded as significant.

The proposed development areas, as viewed from nearby public viewing areas, are shown on Figures 4.2-6 through 4.6-9. As shown by these illustrations, development areas would occur in the southern portions of the Montecito sub-project site. Development of the site would be visible from Pomerado Road, Beeler Canyon Road and Spring Canyon Road, and would be visible in the distance from the higher elevations of the City of Poway, including segments of Scripps Poway Parkway.

Montecito Sub-Project Vantage Point 1 Visual Analysis (Figure 4.2-6)

Vantage Point 1 shows the western portion of the Montecito sub-project site that would be graded and developed with single-family homes. As shown in this exhibit, residential development would be visible from the intersection of Pomerado Road, Cypress Canyon Park Drive and Spring Canyon Drive. A residential building setback of more than 150 feet in width along Pomerado Road would help create a wide, scenic parkway effect along that street. The development of single-family residential homes on the sub-project site would be seen at the tops of manufactured slopes. As shown in the visual simulation on Figure 4.2-6, views of development in the Sycamore Estates sub-project would be visible on the horizon. Homes in the distance would be seen as dotting the hillside, and would partially disrupt views to preserved open space. Because the development areas of the Project would be viewed as a large subdivision of residential units having a monotonous appearance from a distance, direct

and cumulative impacts would occur from this vantage point pursuant to criterion c. The Project is also found to have a significant direct and cumulative visual impact because mass grading would occur that would result in cut or fill slopes in excess of 5 feet in height order to construct flat and gently sloping development pads.

Montecito Sub-Project Vantage Point 2 Visual Analysis (Figure 4.2-7)

Vantage Point 2 shows that development would consist of filling the site's lower elevations adjacent to Pomerado Road and lowering the natural hillside visible from this location to create gently sloping development pads. Residential development would be seen in the valley areas of the site in the area adjacent to Pomerado Road. Views to significant visual landmarks or scenic vistas are not possible from this vantage point. However, development of the Montecito sub-project would result in significant visual quality impacts from this location pursuant to criterion c. Development would be viewed as an extension of existing development in the Scripps Miramar Ranch community to the west, and would not contrast with the established community character.

Montecito Sub-Project Vantage Point 3 Visual Analysis (Figure 4.2-8)

Vantage Point 3 shows the northern portion of the Montecito sub-project site looking south from Beeler Canyon Road. In the top right of the photo, a small portion of the Scripps Miramar Ranch community can be observed in the far background. Residential development and a revegetated manufactured slope proposed by the Montecito sub-project would be seen on the hilltop in the left of the photo. As shown by this exhibit, Beeler Canyon Road is located at a lower elevation than much of the proposed project site. Therefore, scenic vistas from Beeler Canyon Road are blocked by intervening topography, and viewers from this roadway would be looking up toward the proposed development. Because views to significant visual landmarks or scenic vistas are not possible from this vantage point due to intervening topography, significant visual quality impacts would not occur. In addition, because only a small portion of the proposed development would be visible from this location, the Montecito sub-project would not result in the creation of an exceedingly monotonous view from this segment of Beeler Canyon Road.

Montecito Sub-Project Vantage Point 4 Visual Analysis (Figure 4.2-9)

Vantage Point 4 shows the Montecito sub-project site from the terminus of Sikes Place at Kirkham Way in the City of Poway looking south onto the Montecito property. As seen in the visual simulation of Figure 4.2-9, residential development would be seen from Kirkham Way in the higher elevations of the site. The side slopes of Beeler Canyon would be preserved in the northern portion of the subject property; thus, views of Beeler Canyon would not be blocked from the higher elevations in City of Poway, as represented by this vantage point. In addition, views would still be possible beyond the proposed development to portions of MCAS Miramar and the development would not block views to preserved open space. Because the development areas of the Project would be viewed as a large subdivision of residential units having a similar appearance, direct and cumulative visual quality

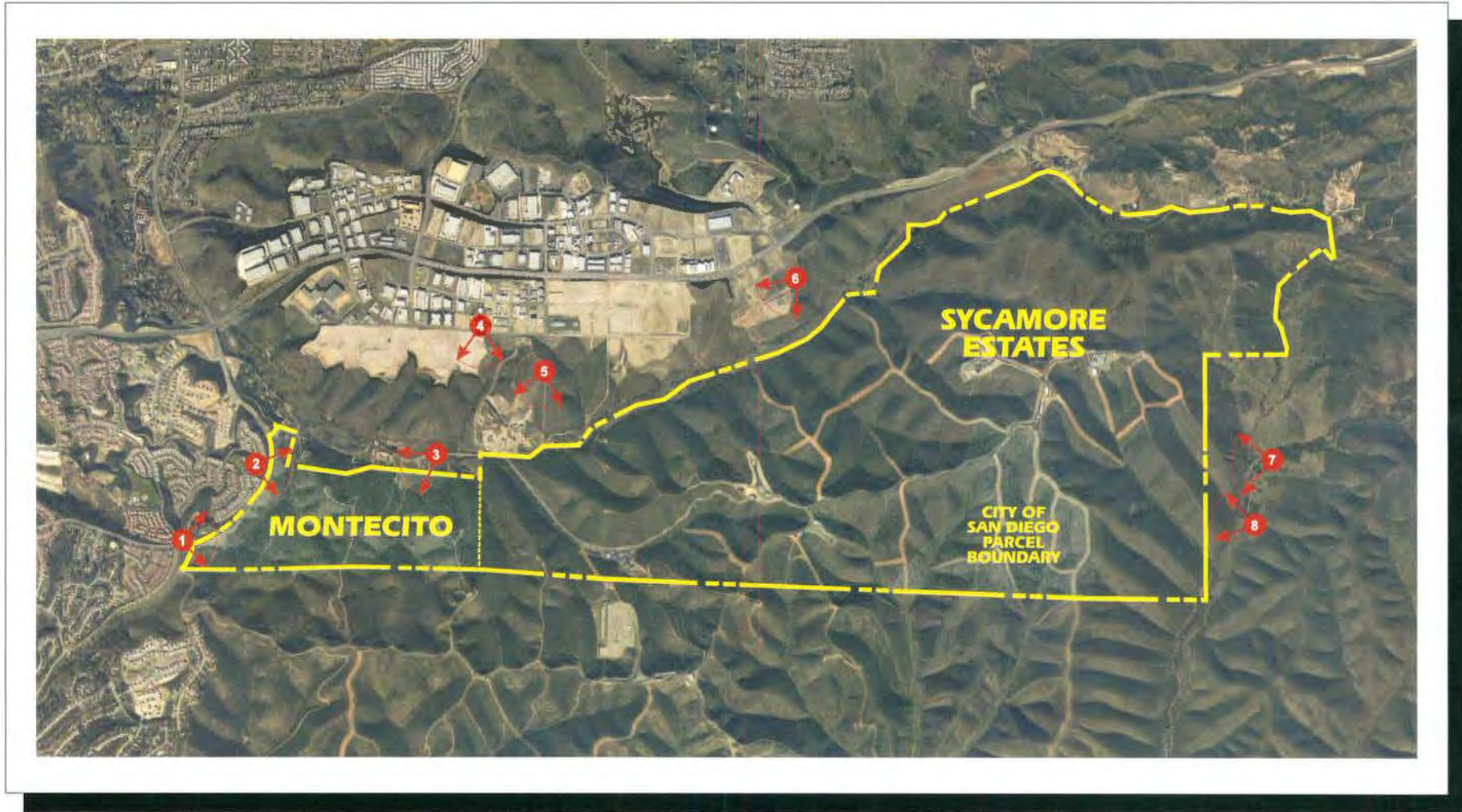
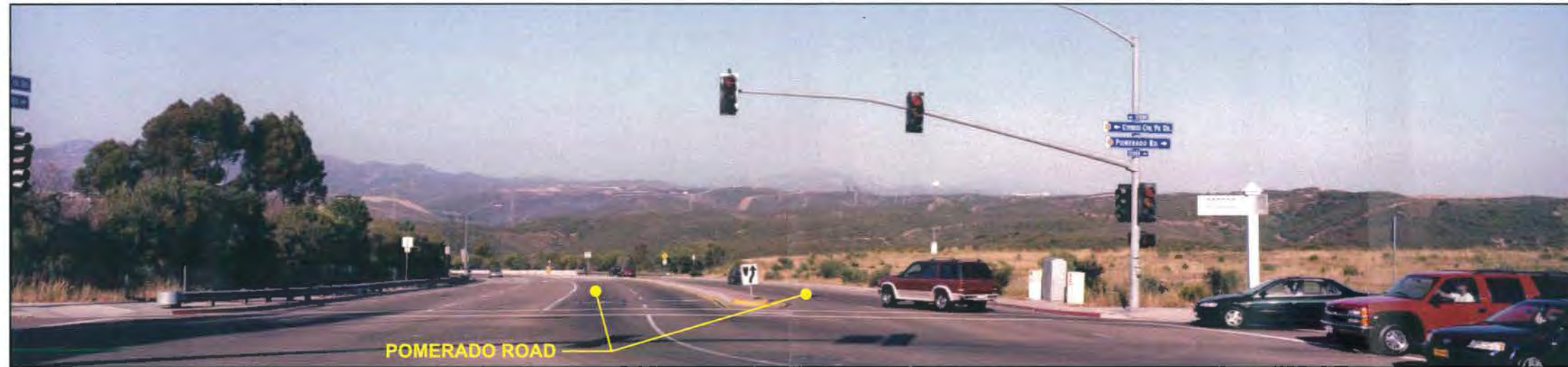
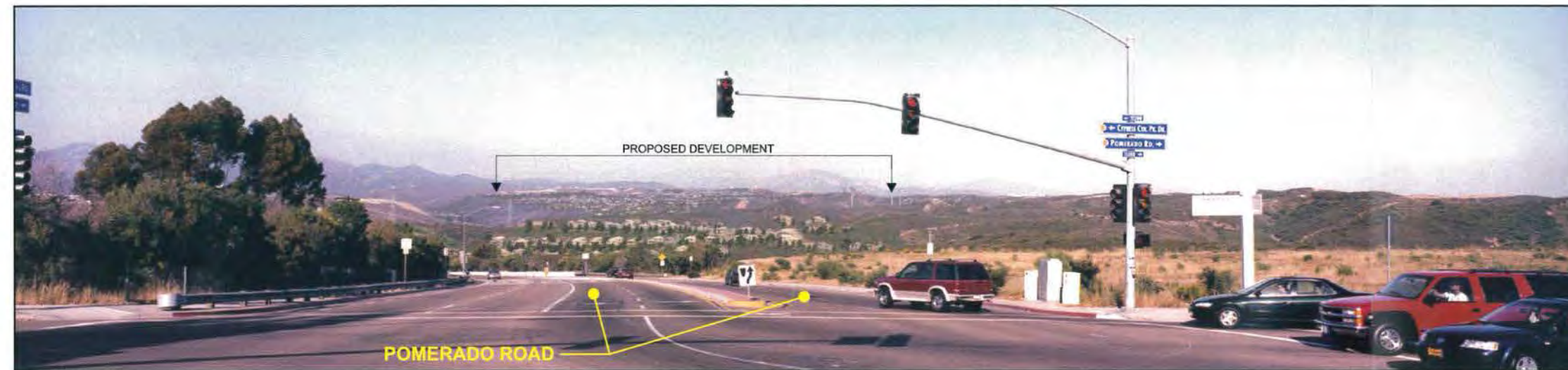


Figure 4.2-5
PHOTO KEY MAP





EXISTING CONDITIONS



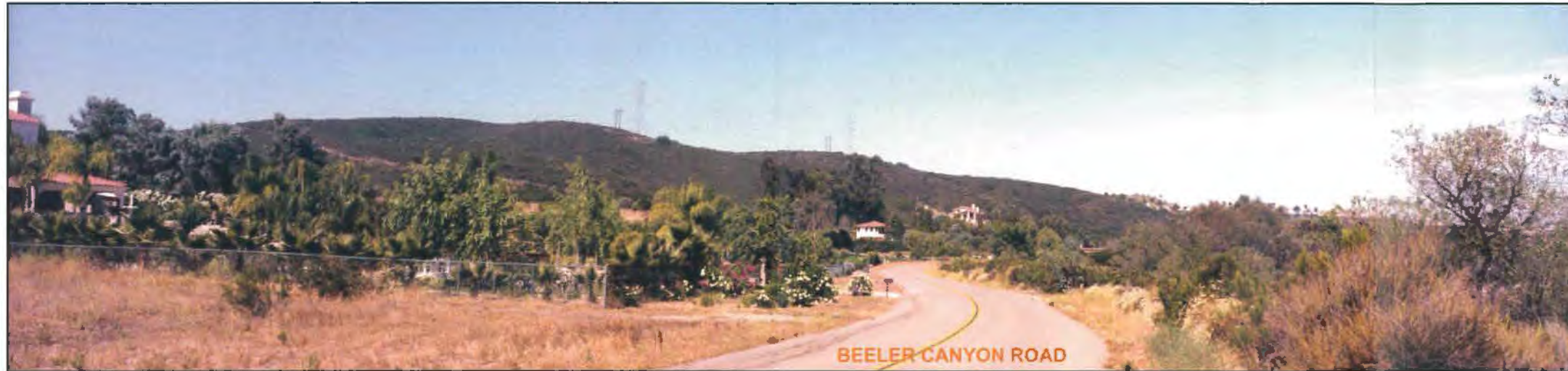
PROPOSED PROJECT FOOTPRINT



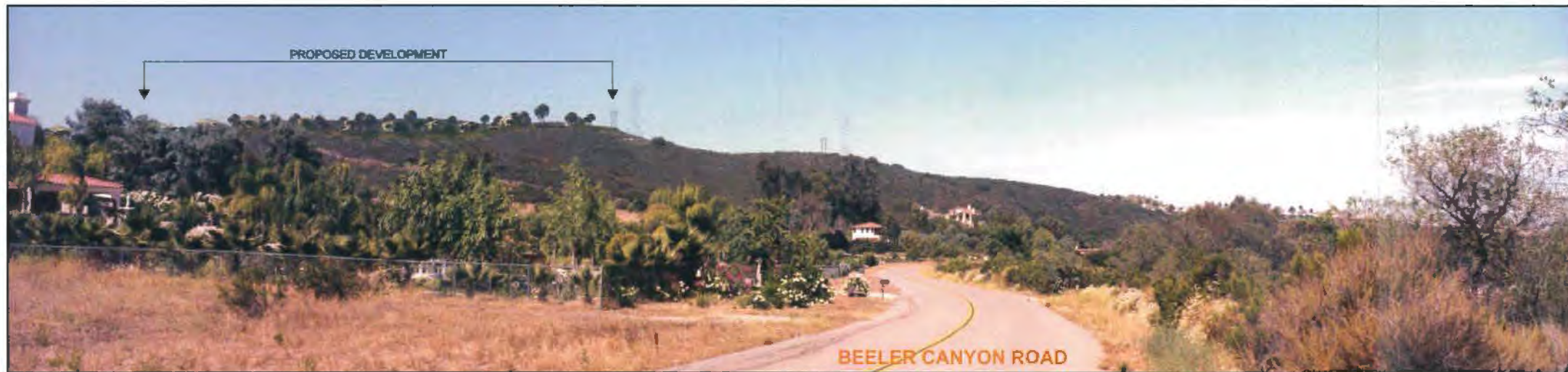
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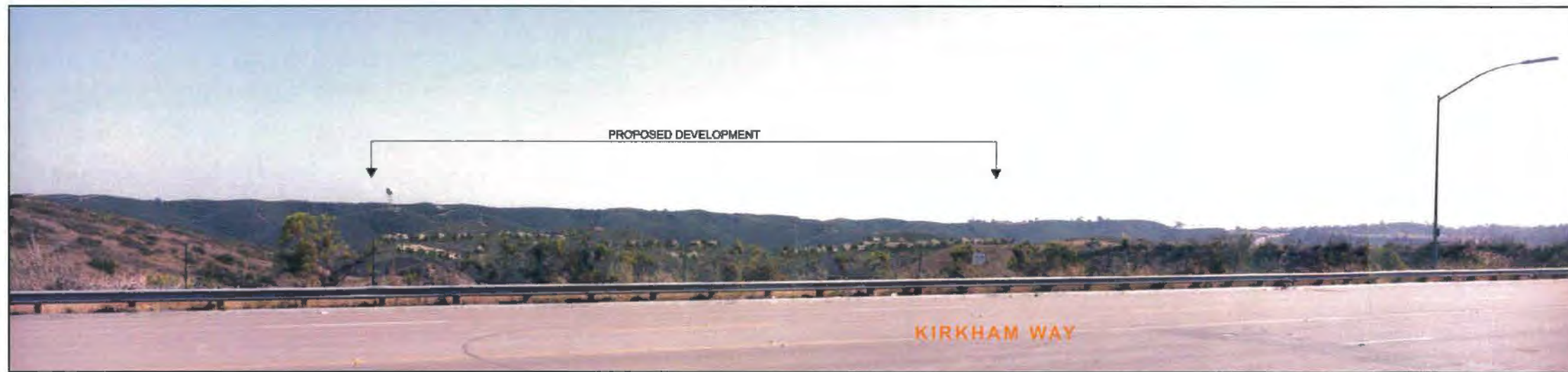
EXISTING CONDITION



PROPOSED PROJECT FOOTPRINT



EXISTING CONDITION



PROPOSED PROJECT FOOTPRINT

impacts would occur from this vantage point. The Project is also found to have a significant direct and cumulative visual impact because mass grading would occur that would result in cut or fill slopes in excess of 5 feet in height order to construct flat and gently sloping development pads.

Summary of the Montecito Sub-Project Visual Analysis

Implementation of the proposed Montecito sub-project would change the visual character of the site from that of an undeveloped open space area to that of a residential community. Although the proposed sub-project would not contrast with the surrounding neighborhood character or cause excess or unnecessary view blockage, the sub-project would result in a significant impact to the visual environment pursuant to criterion c because mass grading would occur to create flat and gently sloping development pads and because the development areas of the Project would be viewed from Pomerado Road and Kirkham Way, and potentially other public roads and viewing areas, as a large subdivision of residential units having a similar appearance.

□ SYCAMORE SUB-PROJECT ESTATES PRD/VTM

The proposed Sycamore Estates sub-project would introduce 557 single family homes, 106 multi-family units, two institutional sites and a school/park site to the Sycamore Estates property, while retaining over 1,700 acres in open space. The proposed residential development pads would occur in the western portions of the sub-project site, with the eastern portions of the site remaining in natural open space as part of the City's MHPA. Architectural elevations are proposed as part of the Sycamore Estates PRD. Building heights would be a maximum of 40 feet, with the proposed multi-family structures reaching a maximum of 50 feet in height. Landscaping would be provided on individual residential lots, the two institutional sites, the proposed school/park site, and along all internal project roadways. All manufactured slopes would be revegetated with native or naturalized plant material. Retaining walls up to approximately six feet in height would be provided between some of the proposed lots.

From a distance, homes would be seen in the higher elevations of the development areas, with the most visible portions of the homes being the rear elevations at the top of proposed manufactured slopes. Exterior manufactured slopes would reach heights of approximately 205 feet, with pad elevations varying by approximately five feet between individual lots. Developed areas in the lower elevations of the site, mainly along Rancho Encantada Parkway, would not be highly visible. The proposed development areas, as viewed from nearby public viewing areas, are shown on Figures 4.2-10 through 4.6-13. As shown by these illustrations, development areas would occur in the western portions of the sub-project site. Intervening topography would block views of the proposed development from existing trails in the Sycamore Canyon County Open Space Preserve. However, proposed trails on the project site would connect with existing trails on the Sycamore Canyon County Open Space Preserve. When on-site trails become available for public use, views of proposed residential development would be possible from public viewing areas in the MHPA. Development of the site would be visible from Kirkham Way, Beeler Canyon Road, and Scripps Poway Parkway. Development also would be visible in the distance from Pomerado Road, as shown previously in Figure 4.2-6, which would be regarded as a significant visual quality impact pursuant to criterion c.

Sycamore Estates Sub-Project Vantage Point 5 Visual Analysis (Figure 4.2-10)

Vantage Point 5 shows a view of the Sycamore Estates sub-project site and a small portion of the Montecito sub-project site from Tech Center Drive in the South Poway Business Park. (It should be noted that when business park buildings are constructed on the graded pads visible in the foreground of this vantage point, views to the sub-project site could be blocked.) As shown by the visual simulation, residential development would occur at the tops of proposed manufactured slopes beyond the business park. Because the proposed sub-project site lies at a lower elevation than the South Poway Business Park, the proposed housing would not block views of open space in MCAS Miramar beyond the sub-project site. Because the development areas of the Project would be viewed as a large subdivision of residential units having a similar appearance, direct and cumulative impacts would occur from public roadways such as Tech Center Drive, north of the sub-project site. The Project is also found to have a significant direct and cumulative visual impact pursuant to criterion c because mass grading would occur that would result in cut or fill slopes in excess of 5 feet in height order to construct flat and gently sloping development pads

Sycamore Estates Sub-Project Vantage Point 6 Visual Analysis (Figure 4.2-11)

Vantage Point 6 shows a view of the Sycamore Estates sub-project site looking south from Kirkham Way in the City of Poway. As shown by the visual simulation, homes would be seen in the distance, but would not block views to preserved open space. (Similar to Vantage Point 5, it should be noted that when business park buildings are constructed on the graded pads visible in the foreground of this vantage point, views to the sub-project site could be blocked.) Even though the proposed development would not be highly visible from this location, it is found that the Project would be viewed as a large subdivision of residential units having a similar appearance. Thus, direct and cumulative impacts would occur from this vantage point pursuant to criterion c.

Sycamore Estates Sub-Project Vantage Points 7 and 8 Visual Analysis (Figure 4.2-12)

Vantage Points 7 and 8 show the Sycamore Estates sub-project site looking westward from an existing public trail in the Sycamore Canyon County Open Space Preserve/Gooden Ranch. Intervening topography would block views of the proposed development from these existing trail locations. No existing public trails in the Sycamore Canyon County Open Space Preserve are located at a high enough elevation to afford views of the proposed development areas over the ridgeline topography in the eastern portion of the site. As part of the *Rancho Encantada* Precise Plan and the Sycamore Estates PRD, proposed trails on the project site would connect with existing trails on the Sycamore Canyon County Open Space Preserve. When on-site trails become available for public use, views of proposed residential development would be possible from public viewing areas in the MHPA.

Summary of the Sycamore Estates Sub-Project Visual Analysis

Implementation of the proposed Sycamore Estates sub-project would change the visual character of approximately 25% of the sub-project site from that of an undeveloped open space area to that of a residential community. Although the proposed sub-project would not contrast with the surrounding

neighborhood character or cause excess or unnecessary view blockage, the sub-project would result in a significant direct and cumulative impact to the visual environment pursuant to criterion c because mass grading would occur to create flat and gently sloping development pads and because the development areas of the Project would be viewed from Pomerado Road, public roadways north of the site, and proposed on-site trails in the MHPA, as a large subdivision of residential units having a similar appearance.

☐ **OFF-SITE GRAVITY SEWER DESIGN OPTION**

As a design option of the proposed Project, a gravity sewer line would be constructed in the City of Poway. The line would be located underground and the ground surface would be restored to its existing condition. As such, no visual quality impacts would occur.

Significance of Impacts

Implementation of the proposed Precise Plan and the Montecito and Sycamore Estates sub-projects would have significant direct and cumulative impacts to the visual quality of the area (see Section 5.0, CUMULATIVE EFFECTS, for a discussion of cumulative visual quality impacts).

Mitigation, Monitoring and Reporting Program

Only adoption of the Reduced Grading, Reduced Project, or RPO Consistent Alternative would partially reduce the direct and cumulative visual quality impacts of the proposed Project.



EXISTING CONDITION



PROPOSED PROJECT FOOTPRINT



EXISTING CONDITION



PROPOSED PROJECT FOOTPRINT



EXISTING CONDITION - VANTAGE POINT 7 (NO VIEWS OF PROPOSED PROJECT FOOTPRINT FROM THIS LOCATION)



EXISTING CONDITION - VANTAGE POINT 8 (NO VIEWS OF PROPOSED PROJECT FOOTPRINT FROM THIS LOCATION)

4.3 BIOLOGICAL RESOURCES

The *Rancho Encantada* Precise Plan area was surveyed for biological resources by HELIX Environmental Planning, Inc. (HELIX) in 1999 and 2000; Ogden Environmental and Energy Services Co., Inc. (Ogden 1999); and Michael Brandman Associates (MBA 1993). Field efforts also included focused surveys for the federally-listed endangered Quino checkerspot butterfly (*Euphydryas editha quino*), the federally-listed threatened coastal California gnatcatcher (*Polioptila californica californica*) and Encinitas baccharis (*Baccharis vanessae*). Jurisdictional wetland determinations were conducted based on the 1987 U.S. Army Corps of Engineers (ACOE) manual and the California Department of Fish and Game (CDFG) requirements. Focused surveys for the California gnatcatcher were conducted according to United States Fish and Wildlife Service (USFWS) guidelines, and focused Quino checkerspot butterfly protocol surveys were conducted in compliance with 2000 USFWS guidelines. The results of these surveys have been incorporated into two biological technical reports entitled *Biological Technical Report for the Sycamore Estates Project* (dated September 18, 2000) and *Biological Technical Report for the Montecito Project* (dated October 3, 2000). These reports are included as Appendices B1 and B2 to this EIR. The biological technical reports provide the public, City of San Diego, USFWS, ACOE, and CDFG with the information necessary to assess the impacts of the proposed Precise Plan and each sub-project to biological resources under each entity's regulatory guidelines. Applicable regulatory plans and policies that apply to the proposed Project include, but are not limited to, the City's Multiple Species Conservation Program (MSCP); and state and federal regulations including the Endangered Species Acts (ESAs); the federal Clean Water Act; Section 1600 of the CDFG Code; and Section 401 of the Clean Water Act as it relates to the California Regional Water Quality Control Board (RWQCB). Although this section of the EIR covers the entire Precise Plan area and off-site improvement areas, it anticipates that the Montecito and Sycamore Estates sub-projects can be mitigated separately.

4.3.1 EXISTING CONDITIONS

□ EXISTING VEGETATION COMMUNITIES

For the purpose of applying appropriate mitigation ratios, the City of San Diego has classified upland vegetation communities into four "tiers" based upon the rarity of the resource. Tier I consists of rare uplands, Tier II consists of uncommon uplands, Tiers IIIA and IIIB consist of common uplands, and Tier IV consists of other, non-sensitive uplands such as disturbed lands, agriculture, and eucalyptus. Wetlands and developed areas are not assigned a tier type. Figures 4.3-1 and 4.3-2, *Existing Vegetation and Sensitive Species*, depict the existing vegetation and sensitive species occurring within the project site. Based on species composition and general physiognomy, five native wetland/riparian, ephemeral drainages, and eight native upland vegetation communities occur on the project site, in addition to eucalyptus woodland, disturbed, and developed areas which are Tier IV, non-sensitive uplands. Wetland/riparian habitats consist of riparian scrub, southern willow scrub, mule fat scrub, wet meadow (freshwater seep), and natural flood channel. Ephemeral drainages are mapped separately as non-wetland, Waters of the U.S. A road pool was also mapped as a separate habitat due to its potential to support federally listed fairy shrimp species.

Upland habitats include coast live oak woodland and native grassland (Tier I), Diegan coastal sage scrub (including disturbed coastal sage scrub) and Diegan coastal sage scrub/chaparral (Tier II), chaparral, chamise chaparral (including disturbed habitat), and southern mixed chaparral (including disturbed southern mixed chaparral) (Tier IIIA), and non-native grassland (Tier IIIB). Provided below in Table 4.3-1, *Existing Vegetation Communities*, and in the following text is a summary of vegetation occurring on the project site.

**Table 4.3-1
ON-SITE EXISTING VEGETATION COMMUNITIES**

VEGETATION COMMUNITY	TIER LEVEL	MONTECITO ACREAGE	SYCAMORE ESTATES ACREAGE		CITY OF SAN DIEGO ACREAGE	TOTAL ACRES
			DEV. PARCEL	MHPA PARCEL		
SWS	Southern Willow Scrub	Wetland	0.17	--	--	0.17
MFS	Mule Fat Scrub	Wetland	--	0.06	--	0.06
RS	Riparian Scrub	Wetland	--	--	3.06	3.06
WM	Wet Meadow (freshwater seep)	Wetland	0.11	--	--	0.11
NFC	Natural Flood Channel ¹	Wetland	0.16	0.70	--	0.86
ED	Ephemeral Drainage	Waters of U.S.	0.64	1.82	--	2.46
OW	Coast Live Oak Woodland	I	--	4.9	5.9	10.8
NG	Native Grassland	I	--	4.0	30.0	34.0
CSS	Diegan Coastal Sage Scrub (& disturbed)	II	50.1	221.3	430.5	784.9
DCS	Diegan Coastal Sage Scrub/chaparral ecotone	II	13.4	3.0	117.2	139.8
SMC	Southern Mixed Chaparral (& disturbed)	IIIA	84.2	424.5	--	508.7
CC	Chamise Chaparral (& disturbed)	IIIA	111.5	220.8	--	332.3
C	Chaparral (undifferentiated) ²	IIIA	--	8.4	466.5	586.3
NNG	Non-Native Grassland	IIIB	12.6	8.5	9.9	31.0
EW	Eucalyptus Woodland	IV	--	0.3	8.1	8.4
DEV	Developed	--	--	39.7	32.9	74.8
RP	Road Pool ³	IV	--	<0.01	--	0.01
D	Disturbed	IV	5.2	41.5	48.5	135.5
	TOTAL		278.1	979.5	1,152.5	2,658.4

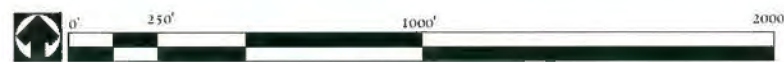
1 These areas were not delineated for the eastern MHPA area of the Sycamore Estates sub-project site.
2 MBA (1993) survey did not distinguish between the two types of chaparral habitat found on site, however, HELIX did resurvey areas proposed to be impacted and acreage totals have been adjusted accordingly.
3 Included in acreage for disturbed habitat.

Source: HELIX Environmental Planning; September 18 and October 3, 2000



SOURCE: HELIX ENVIRONMENTAL PLANNING

Figure 4.3-1
MONTECITO
EXISTING VEGETATION AND SENSITIVE SPECIES



LEGEND

Wetland/Ephemeral Drainage

- Mule fat scrub
- Riparian scrub
- Natural flood channel (Wetland)
- Ephemeral drainage (Waters of the U.S.)

Uplands

- Oak woodland
- Native grassland
- Diegen coastal sage scrub
- Diegen coastal sage scrub/chaparral ecotone
- Southern mixed chaparral
- Chamise chaparral
- Chaparral (undifferentiated)
- Non-native grassland

Other Uplands

- Eucalyptus woodland
- Road pool
- Disturbed habitat
- Developed
- Existing MHPA boundary
- Wildlife movement corridor

Sensitive Plants

- Ml Willow monardella (*Monardella incisa* ssp. *viridula*)
- Dv Variegated dudleya (*Dudleya variegata*)
- Mc San Diego golden star (*Stella clevelandii*)
- Od Mission Canyon blue cup (*Kitipops diffusus* ssp. *filicoides*)
- Fv San Diego barrel cactus (*Ferocactus viridescens*)
- Ap San Diego sagewort (*Artemisia puberula*)
- Dc California adder's tongue fern (*Ophiodon californicus*)

Note: Ashy spike-moss (*Salvinella omissa*) occurs throughout the site and the southeast portion of the development parcel has been burned recently.

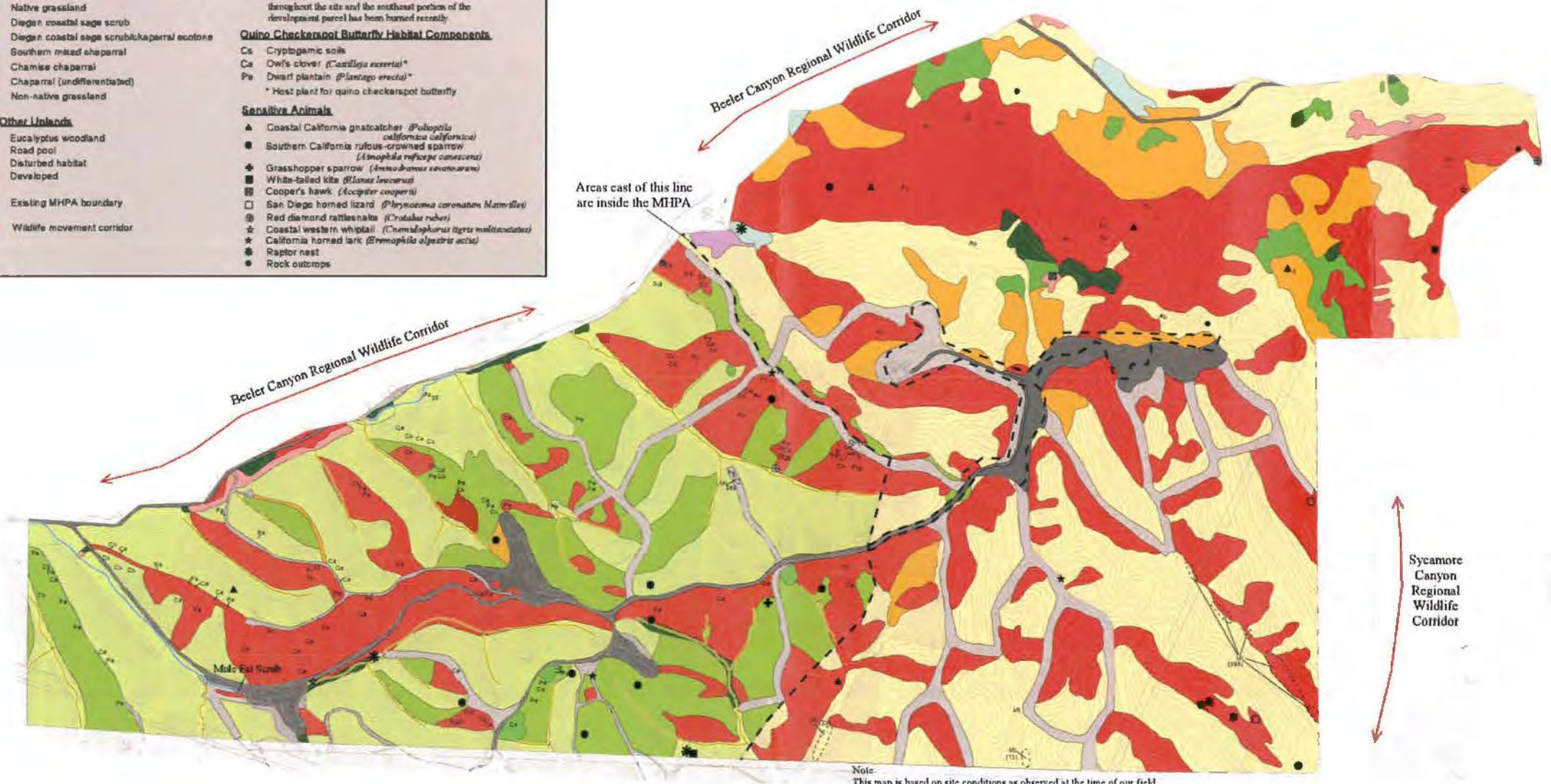
Quino Checkerspot Butterfly Habitat Components

- Cx Cryptogamic soils
- Ce Owl's clover (*Castilleja exserta**)
- Pe Dwarf plantain (*Plantago exserta**)

* Host plant for quino checkerspot butterfly

Sensitive Animals

- ▲ Coastal California gnatcatcher (*Polioptila californica californica*)
- Southern California rufous-crowned sparrow (*Linophila ruficeps canescens*)
- ◆ Grasshopper sparrow (*Ammodramus eximius*)
- White-tailed kite (*Buteo leucurus*)
- Cooper's hawk (*Accipiter cooperii*)
- San Diego horned lizard (*Phrynosoma coronatum* *Mantelli*)
- ⊕ Red diamond rattlesnake (*Crotalus ruber*)
- ★ Coastal western whiptail (*Cnemidophorus tigris multicaudatus*)
- ☆ California horned lark (*Eremophila alpestris actus*)
- Raptor nest
- Rock outcrops



SOURCE: HELIX ENVIRONMENTAL PLANNING

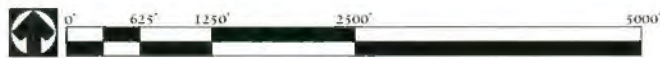


Figure 4.3-2
SYCAMORE ESTATES
EXISTING VEGETATION AND SENSITIVE SPECIES

In addition, Table 4.3-2, *Off-Site Gravity Sewer Design Option Vegetation Communities*, summarizes the vegetation that occurs within the alignment of the off-site gravity sewer line proposed as a design option in the City of Poway.

**Table 4.3-2
OFF-SITE GRAVITY SEWER DESIGN OPTION VEGETATION COMMUNITIES**

VEGETATION COMMUNITY		TIER LEVEL	GRAVITY SEWER ALIGNMENT
MFS	Mulefat Scrub	Wetland	0.02
SWS	Southern Willow Scrub	Wetland	0.02
FM	Freshwater Marsh	Wetland	0.01
WM	Wet Meadow (freshwater seep)	Wetland	0.01
NFC	Natural Flood Channel	Wetland	0.02
OW	Coast Live Oak Woodland	I	0.3
CSS	Diegan Coastal Sage Scrub (& disturbed)	II	0.1
NNG	Non-Native Grassland	III B	0.1
DEV	Developed	—	3.4
D	Disturbed	IV	0.1
TOTAL			4.08

Source: HELIX Environmental Planning; September 18, 2000

Riparian Scrub (Wetland)

Riparian scrub is a generic term for several shrub dominated communities that occur along drainages and/or riparian corridors including southern willow scrub, mule fat scrub and tamarisk scrub. The habitat on site is dominated by mule fat (*Baccharis salicifolia*) and also contains black willow (*Salix gooddingii*), Italian ryegrass (*Lolium multiflorum*), curly dock (*Rumex crispus*), cyperus (*Cyperus* sp.), and wildrye (*Elymus* sp.). A total of 3.06 acres of riparian scrub habitat occurs in the northern part of the Sycamore Estates sub-project within the eastern MHPA area.

Southern Willow Scrub (Wetland)

Southern willow scrub consists of dense, broad-leaved, winter-deciduous stands of trees dominated by shrubby willows (*Salix* sp.) in association with mule fat. This habitat occurs on loose, sandy or fine gravelly alluvium deposited near stream channels during flood flows. The herbaceous understory consists of curly dock, cocklebur (*Xanthium strumarium* var. *canadense*) and western ragweed (*Ambrosia psilostachya* var. *californica*). Though floristically very similar to southern willow riparian woodlands, there are differences in physiognomy: southern willow scrub lacks a tree stratum and the lower shrub stratum has higher cover and density

values. Frequent flooding maintains this early seral community, preventing succession to riparian woodland or forest (Holland 1986). On-site, southern willow scrub is characterized by thickets dominated by willow. Approximately 0.17-acre of southern willow scrub occurs adjacent to Pomerado Road on the Montecito sub-project site in the northwestern MHPA area. Southern willow scrub also occurs off-site on 0.02-acre along the gravity sewer alignment proposed as a design option of the proposed Project.

Mule Fat Scrub (Wetland)

Mule fat scrub communities are shrub-dominated communities that occur within stream courses. On-site, this habitat is dominated by mule fat and also contains arroyo willow (*Salix lasiolepis*) and brown umbrella-sedge (*Cyperus niger*). The mule fat scrub on site is located in an intermittent stream channel in the central area of the development area. Approximately 0.06-acre of mule fat scrub occurs on the Sycamore Estates sub-project site in a disturbed portion of streambed at the outlet of a cement culvert and a cement trapezoidal channel that are located below an existing developed area. Approximately 0.02-acre of mule fat scrub also occurs off-site along the proposed gravity sewer alignment.

Wet Meadow - Freshwater Seep (Wetland)

Wet meadow is a wetland community dominated by perennial herbs, especially sedges and grasses. This habitat is seasonally to permanently moist and often occurs in shallow swales or seasonal streambeds. It differs from freshwater marsh in that it is usually low growing and is not perennially inundated with water. Wet meadow on the site contains species such as doveweed (*Eremocarpus setigerus*), curly dock, and rushes (*Juncus dubious* and *J. bufonis*). Approximately 0.11-acre of wet meadow habitat occurs in two canyons on the Montecito sub-project site and on 0.01-acre along the off-site gravity sewer line alignment.

Natural Flood Channel (Wetland)

Natural flood channel consists of non-vegetated channels that conduct ephemeral water flows immediately following rainfall events. On site, these drainages are cobbly and have defined bed and bank topography from water scouring. These areas are ACOE, CDFG, and City jurisdictional wetlands. Under ACOE jurisdiction, they are considered non-vegetated waters of the U.S. Under CDFG jurisdiction, they are considered streambed. Natural flood channel occurs throughout the project site within the valley areas of the steep v-shaped canyons. The natural flood channel retains water for short periods following storm related rainfall, and may function as areas of groundwater recharge. These areas receive water for longer durations than ephemeral drainages and act as natural filters. A total of 0.16-acre occurs on the Montecito sub-project site, and 0.70-acre occurs on the central and western portions of the Sycamore Estates sub-project site, for a total of 0.86-acre. Natural flood channels were not formally delineated on the eastern MHPA portion of the Sycamore Estates sub-project site. (Because no impacts would occur in this eastern MHPA area, a formal delineation of natural flood channels is not required.) Natural flood channel also occurs off-site on 0.02-acre along the gravity sewer line alignment.

Freshwater Marsh (Wetland)

Coastal and valley freshwater marsh is dominated by perennial, emergent monocots, including cattail (*Typha latifolia*) and bulrush (*Scirpus* sp.), which reach a height of 12 to 15 feet. This vegetation type occurs along the coastal valleys near river mouths and around the margins of lakes and springs. Freshwater marsh is a riparian habitat type and is considered sensitive by the CDFG (Holland 1986), City of San Diego (1998), and USFWS. Off-site, 0.01-acre of freshwater marsh occurs along the gravity sewer line alignment. This wetland habitat is naturally limited and remaining acreage provides important habitat for migrant birds as well as performing many other functions such as floodwater conveyance and water quality control.

Ephemeral Drainage (Jurisdictional Waters of the U.S.)

Ephemeral drainages occur throughout the site within the valley areas of the steep V-shaped canyons. Ephemeral drainages are a type of Waters of the U.S. and contain water only during, and for a short duration after, precipitation events in a typical year. A total of 0.64-acre occurs on the Montecito sub-project site, and 1.82 acres occur on the Sycamore Estates sub-project site, for a total of 2.46 acres. These areas are not classified as natural flood channels because they do not meet the hydrology definition of a wetland (i.e., saturated for at least five percent of the growing season), are very narrow (less than 2 feet in width) and have relatively small watersheds.

Coast Live Oak Woodland (Tier I)

This is an open to dense evergreen woodland, dominated by oaks (*Quercus agrifolia*, *Q. berberidifolia* and *Q. agrifolia* X *Q. berberidifolia*). The shrub layer may consist of toyon (*Heteromeles arbutifolia*), Mexican elderberry (*Sambucus mexicana*), fuchsia-flowered gooseberry (*Ribes speciosum*), and poison oak (*Toxicodendron diversilobum*). A dense herbaceous understory is dominated by miner's lettuce (*Claytonia perfoliata* var. *perfoliata*) and chickweed (*Stellaria media*). This community occurs along the coastal foothills of the Peninsular Ranges; typically, on north-facing slopes and shaded ravines (Holland 1986). This habitat occurs on the north-central and eastern portions of the site. Approximately 10.8 acres of oak woodland occur on the Sycamore Estates sub-project site in the eastern MHPA area and in the north-central area of the sub-project site. An additional 0.3-acre occurs off-site along the gravity sewer alignment.

Native Grassland (Tier I)

Native grassland is a community dominated by perennial bunchgrasses such as purple needle grass (*Nassella pulchra*) with annual and perennial forbs such as common gold stars (*Bloomeria crocea* ssp. *crocea*) and California blue-eyed grass (*Sisyrinchium bellum*). Native grasslands generally occur on fine-textured soils that generally exclude the annual, exotic grasses. Almost all of the native grasslands in California have been displaced by non-native grassland dominated by introduced annual species. Native grasslands occur throughout California as small isolated islands. Approximately 34.0 acres of native grassland is present on

the Sycamore Estates sub-project site, with 30.0 acres occurring in the eastern MHPA area, and 4.0 acres occurring in the eastern development area.

Diegan Coastal Sage Scrub (including disturbed and Diegan coastal sage scrub/chaparral ecotone) (Tier II)

Coastal sage scrub is one of the two major shrub types that occur in California. This habitat type occupies xeric sites characterized by shallow soils. Sage scrub species have relatively shallow root systems and open canopies that allow for the occurrence of a substantial herbaceous component. Four geographically distinct floristic associations are recognized within the coastal sage scrub plant formation. All four occur on the California coast, with the Diegan association occupying the area from Orange County to northwestern coastal Baja California, Mexico (O'Leary 1990). Dominant species on-site include California sagebrush (*Artemisia californica*), black sage (*Salvia mellifera*), and flat-top buckwheat (*Eriogonum fasciculatum*). Other, less numerous species included lemonadeberry (*Rhus integrifolia*), laurel sumac (*Malosma laurina*), spiny redberry (*Rhamnus crocea*), deerweed (*Lotus scoparius*), and broom baccharis (*Baccharis sarothroides*). In open canopy areas herbaceous understory plants include foothill needlegrass (*Nassella lepida*), ashy spike-moss (*Selaginella cinerascens*), fascicled tarweed (*Hemizonia fasciculata*), chalk live-forever (*Dudleya pulverulenta*), wishbone bush (*Mirabilis californica* var. *californica*), and San Diego barrel cactus (*Ferocactus viridescens*). On-site this habitat also includes areas mapped as Diegan coastal sage scrub/chaparral ecotone. These areas contain a mix of both sage scrub and chaparral species. A total of 924.7 acres of this habitat (including 21.0 acres of disturbed and 139.8 acres of Diegan coastal sage scrub/chaparral ecotone) occur on the site. Of this total, 63.5 acres occur on the Montecito sub-project site, 772.0 acres occur on the Sycamore Estates sub-project site, and 89.2 acres occur on the City of San Diego owned parcel. Off-site, 0.1-acre occurs along the gravity sewer alignment.

Chaparral (Undifferentiated) (Tier IIIA)

Chaparral is the most prominent vegetation type within the regions of California which experience a Mediterranean climate. Chaparral communities are dominated by evergreen shrubs with small, sclerophyllous ("hard leaved") leaves, a rigid, branching structure, and a dual root system composed of both deep tap roots and a shallow lateral root system (Rundel 1986). Chaparral occurs from sea level to 6,000 feet on rocky, nutrient poor soils and is generally best developed on steep slopes. Herbaceous vegetation is generally lacking within these stands, except after fires. Approximately 478.2 acres of undifferentiated chaparral occur on the Sycamore Estates sub-project site and approximately 111.4 acres occur on the City of San Diego owned parcel, for a total of 589.6 acres.

Southern Mixed Chaparral (including disturbed) (Tier IIIA)

Southern mixed chaparral is composed of broad-leaved, sclerophyllous shrubs that grow to about 6 to 10 feet tall and form dense often nearly impenetrable stands. This habitat occurs in dry, rocky, often steep north-facing slopes with little soil. As conditions become more mesic, broad-leaved, sclerophyllous shrubs that resprout from underground root crowns become dominant. On site dominant plant species observed within this habitat include ceanothus (*Ceanothus* sp.), black sage, and chamise (*Adenostoma fasciculatum*), and scrub oak (*Quercus berberidifolia*). Approximately 84.2 acres occur on the Montecito sub-project site and 424.5 acres occur on the Sycamore Estates sub-project site, for a total of 508.7 acres.

Chamise Chaparral (Tier IIIA)

Chamise chaparral is dominated by chamise. This habitat is found from Baja California, Mexico to northern California in pure or mixed stands. The ubiquitous distribution of chamise may be the result of its being the only chaparral species that regenerates after fire from both an underground root crown as well as the production of seeds (Rundel 1986; Parker 1984). It often dominates at low elevations and on xeric south-facing slopes with 60 to 90 percent canopy cover. Along its lower elevation limit, chamise intergrades with coastal sage scrub (Rundel 1986). Mission manzanita (*Xylococcus bicolor*) and black sage are minor associates within this community. Approximately 111.5 acres occur on the Montecito sub-project site and 217.5 acres occur on the Sycamore Estates sub-project site, for a total of 329.0 acres.

Non-Native Grassland (Tier IIIB)

Non-native grassland is a dense to sparse cover of non-native grasses, often associated with numerous species of showy-flowered, native, annual forbs, especially in years of high rainfall. This habitat occurs on gradual slopes with deep, fine-textured, usually clay soils. Characteristic species include wild oat (*Avena* sp.), red brome (*Bromus madritensis* ssp. *rubens*), ripgut (*Bromus diandrus*), ryegrass (*Lolium* sp.), and mustard (*Brassica* sp.). Most of the annual, introduced species that comprise the majority of the species composition and biomass within the non-native grassland originated from the Mediterranean region, an area with long history of agricultural practices in conjunction with severe droughts, contributed to the successful invasion and establishment of these species and the replacement of native grasslands with an annual-dominated, non-native grassland (Jackson 1985). Non-native grasslands are common throughout the County of San Diego and serve as valuable raptor foraging habitat. On-site, some grassland areas were formerly disturbed lands. Characteristic species include wild oat and red stem filaree (*Erodium* sp.). Approximately 12.6 acres occur on the Montecito sub-project site and approximately 18.4 acres occur on the Sycamore Estates sub-project site, for a total of 31.0 acres. Non-native grassland also occurs on 0.1-acre off-site along the proposed gravity sewer alignment.

Eucalyptus Woodland (Tier IV)

Eucalyptus Woodland is dominated by eucalyptus (*Eucalyptus* sp.), an introduced species, that produces a large amount of leaf and bark litter. The chemical and physical characteristics of this litter limit the ability of other species to grow in the understory, thereby decreasing floristic diversity in this habitat. In most instances, eucalyptus trees are planted for a variety of cultural reasons. If sufficient moisture is available, eucalyptus become naturalized and are able to reproduce and expand their range. This has happened in many riparian areas. On-site this habitat supports occasional pepper trees (*Schinus molle*). Approximately 8.4 acres of eucalyptus woodland occur on the Sycamore Estates sub-project site, with 0.3-acre in the south-central portion of the development area and 8.1 acres in the northwestern MHPA area.

Road Pool (Tier IV)

One unvegetated road pool occurs in the north-central area of the Sycamore Estates sub-project. Its overall surface area is less than 0.01-acre. Vehicular activity created or enhanced a depression and compacted the soil to create this on-site pool. This compaction allows water to pond readily, even in a dry year when vernal pools remain dry. Even with adequate water, the compacted soil in the road pool on-site makes it very difficult for vegetation to become established. The road pool on-site lacks vernal pool indicator plant species. Road pools are distinguished from vernal pools based on the absence of vernal pool indicator plant species.

Disturbed (Tier IV)

Disturbed areas occur where native habitat has recently been disced, cleared or otherwise altered. Some disturbed areas contain little, if any, vegetation. Other areas include ruderal vegetation dominated by non-native weedy species. Many of the species characteristic of disturbed habitat also occur in non-native grasslands, but disturbed habitat is dominated by invasive species other than grasses. On-site disturbed habitat typically occurs in areas containing fire breaks and dirt roads. Where present, vegetation is dominated by fennel, mustard, white tumbleweed (*Amaranthus albus*), horseweed (*Conyza* spp.), lamb's quarters (*Chenopodium album*), and fountain grass (*Pennisetum setaceum*). Non-native grasses account for less than 10 percent of the total vegetative cover. Approximately 90.0 acres of disturbed lands occur on the Sycamore Estates sub-project site, approximately 5.2 acres on the Montecito sub-project site and approximately 45.5 acres occur on the City of San Diego owned parcel, for a total of 140.7 acres. An additional 0.1-acre is mapped as disturbed along the off-site gravity sewer alignment.

Developed (no assigned tier)

Developed areas support no native vegetation and contain man-made structures (or the remnants of these structures) and paved areas such as roadways. There is a total of 72.6 acres of developed area on the Sycamore Estates sub-project site and 2.2 acres on the City of San Diego owned parcel, for a total of 74.8 acres. Along the off-site gravity sewer alignment, developed areas account for 3.4 acres.

□ SENSITIVE PLANT SPECIES

Sensitive plant species include those listed by the USFWS, the CDFG and/or the California Native Plant Society (CNPS). The CNPS listing is sanctioned by CDFG and essentially serves as the CDFG list of “candidate” plant species for threatened or endangered status. Sensitive plant species observed or having a potential for occurring on the *Rancho Encantada* project site and/or along the proposed off-site gravity sewer alignment, are listed below with an explanation of CNPS listings and sensitivity codes.

Eight sensitive plant species were observed on the project site (see Figures 4.3-1 and 4.3-2). One of these species, willow monardella (*Monardella linoides* ssp. *viminea*), is state and federally listed as endangered. Also observed on the site were two additional plant species: dwarf plantain and owl’s clover, which are not considered sensitive but are host plants for the Quino checkerspot butterfly. Table 4.3-43, *Sensitive Plant Species Observed on the Rancho Encantada Project Site*, summarizes each species status and location. Additional information on each observed plant species is found in the biology technical report contained as Appendix B to this EIR. Twenty-four other sensitive plant species have the potential to occur on the project site but were not observed, and are listed in Appendix B to this EIR.

No sensitive plant or animal species were observed during surveys of the off-site gravity sewer line alignment. The potential for City of San Diego narrow endemics is considered very low. San Diego thornmint, Shaw’s agave, aphanisma, coastal dunes milk vetch, short-leaved live-forever, Otay tarplant, prostrate navarretia, snake cholla, California orcutt grass, San Diego mesa mint, and Otay mesa mint are not expected to occur within the alignment because there is no appropriate habitat for these species, and/or the site is well outside of the species’ known range of occurrence. San Diego ambrosia and Encinitas baccharis would likely have been detected if present. One other high sensitivity species known from the project area, willow monardella, would also have been observed if present. Therefore, no sensitive plant species are assumed to exist within the alignment.

Table 4.3-3
SENSITIVE PLANT SPECIES OBSERVED ON THE RANCHO ENCANTADA PROJECT SITE

COMMON NAME	SCIENTIFIC NAME	STATUS*	LOCATION
Willow monardella	<i>Monardella linoides</i> <i>ssp. viminea</i>	USFWS FE, CDFG SE, CNPS List 1B, R-E-D Code 2-3-2, MSCP	Willow monardella was found on the south central portion of the MHPA area of Sycamore Estates.
Variiegated dudleya	<i>Dudleya variegata</i>	USFWS FSC, CNPS List 1B, R-E-D Code 2-2-2, MSCP	Variiegated dudleya was observed in the northeastern portion of the development parcel on Sycamore Estates, outside the project footprint.
San Diego goldenstar	<i>Muilla clevelandii</i>	USFWS FSC, CNPS List 1B, R-E-D Code 2-2-2, MSCP	San Diego goldenstar was observed in the northeastern portion of the development parcel on Sycamore Estates, outside the project footprint.
Mission Canyon bluecup	<i>Githopsis diffusa</i> <i>ssp. filicaulis</i>	USFWS FSC, CNPS List 1B, R-E-D Code 3-3-2	Mission Canyon bluecup was observed in the northeastern portion of the development parcel on Sycamore Estates, outside the project footprint.
San Diego barrel cactus	<i>Ferocactus viridescens</i>	USFWS FSC, CNPS List 2, R-E-D Code: 1-3-1, MSCP	San Diego barrel cactus was observed in the northern portions of the MHPA area and the development parcel on Sycamore Estates. It was also observed on the Montecito site. Some populations observed within project footprints.
San Diego sagewort	<i>Artemisia palmeri</i>	CNPS List 2, R-E-D Code 2-2-1	San Diego sagewort was observed on Sycamore Estates in the eastern portion of the MHPA area and to the north of the development parcel, outside the project footprint.
California Adder's-Tongue Fern	<i>Ophioglossum californicum</i>	CNPS List 4, R-E-D Code 1-2-2	California adder's tongue fern was observed in the northeastern portion of the MHPA area on Sycamore Estates.
Ashy spike-moss	<i>Selaginella cinerascens</i>	CNPS List 4, R-E-D Code 1-2-1	Ashy spike-moss was found throughout the site within open sage scrub and chaparral habitats, but mostly along the ridgetops of both Montecito and Sycamore Estates. Some populations observed within project footprints.

COMMON NAME	SCIENTIFIC NAME	STATUS*	LOCATION
Dwarf plantain ¹	<i>Plantago erecta</i>	Not presently rare or endangered.	Dwarf plantain was observed in the central portion of Montecito and in the eastern portions of the development parcel of Sycamore Estates, some within project footprints. It was observed along the edges and in the open areas of chaparral, coastal sage scrub and along the old trails, roads and firebreaks.
Owl's Clover ¹	<i>Castilleja exserta</i>	Not presently rare or endangered.	Owl's clover was observed on the central and western portions of the development parcel in Sycamore Estates, some within project footprints. It was observed in the open areas of the native grasslands, chaparral and coastal sage scrub and along old trails, roads and firebreaks.

1. Not sensitive, but is a host plant for the federally listed as endangered Quino checkerspot butterfly.
Source: HELIX Environmental Planning; September 18, 2000

EXPLANATION OF STATUS CODES FOR PLANTS AND ANIMALS

California Native Plant Society (CNPS) Lists

- 1B = Rare, threatened, or endangered in California and elsewhere. Eligible for state listing.
- 2 = Rare, threatened, or endangered in California but more common elsewhere. Eligible for state listing.
- 4 = A watch list for species of limited distribution. Needs monitoring for changes in population status.

R-E-D Code / R (Rarity)

- 1 = Rare but found in sufficient numbers and distributed widely enough that potential for extinction is low at this time.
- 2 = Occurrence confined to several populations or to one extended population.
- 3 = Occurrence limited to one or a few highly restricted populations, or present in such small numbers that it is seldom reported.

E (Endangerment)

- 2 = Endangered in a portion of its range
- 3 = Endangered throughout its range

D (Distribution)

- 1 = More or less widespread outside California
- 2 = Endangered in a portion of its range

U.S. Fish and Wildlife Service (USFWS)

- FE Federally listed endangered
- FSC Federal special concern species (a "term of art" for former Category 2 candidates)

California Department of Fish and Game (CDFG) Multiple Species Conservation Program (MSCP)

- SE State listed endangered
- MSCP = Multiple Species Conservation Program covered species.

SENSITIVE ANIMAL SPECIES

Sensitive animal species are those which are considered sensitive by the USFWS, CDFG, and/or are MSCP target species (City of San Diego 1995). Twelve (12) sensitive animal species were observed on the site. Of these species, only the coastal California gnatcatcher is listed (federally listed as threatened). Based on the habitat types present on the site, 26 sensitive, listed, and/or MSCP target animal species may potentially utilize the site, but were not observed during the field surveys. Appendix B of the Technical Appendices refers to sensitive animal species that have the potential of occurring on the Sycamore Estates site. Table 4.3-4, *Observed Sensitive Animal Species*, summarizes each observed species status and their location on the site.

In 1999, two occupied raptor nests were observed in the south-central portion of the Sycamore Estates sub-project site. One nest was located in eucalyptus trees and the other nest was located in southern mixed chaparral. Occupied nests are protected by tenets of the federal Migratory Bird Treaty Act (MBTA).

**Table 4.3-4
OBSERVED SENSITIVE ANIMAL SPECIES**

COMMON NAME	SCIENTIFIC NAME	STATUS*	LOCATION
San Diego horned lizard	<i>Phrynosoma coronatum blainvillei</i>	USFWS FSC, CDFG CSC, SDHS, MSCP	San Diego horned lizard was observed in the western portion of the Montecito project site and has the potential to occur over much of the project site. Observed within project footprint both in and outside the MHPA and outside the footprint in the MHPA.
Red diamond rattlesnake	<i>Crotalus ruber</i>	USFWS FSC, CDFG CSC,	Red diamond rattlesnake was observed in the central portions of the Sycamore Estates site and it likely occurs over much of the project site. It has been observed in the past in the eastern portion of the project site. Not observed within project footprint.
Orange-throated whiptail	<i>Cnemidophorus hyperythrus beldingi</i>	USFWS FSC, CDFG: CSC	Orange-throated whiptail was observed in numerous locations on the western portion of the Montecito project site within the project footprint and likely occurs over much of the site.
Coastal western whiptail	<i>Cnemidophorus tigris multiscutatus</i>	USFWS FSC	Coastal western whiptail was observed in the eastern portion of the Sycamore Estates site within the MHPA and also the project footprint, and is likely to occur over much of the site.
Coastal California gnatcatcher	<i>Polioptila californica californica</i>	USFWS FT, CDFG CSC, NCCP, MSCP, Poway HCP	Coastal California gnatcatcher was observed in the central portion of the Sycamore Estates site. One of these was observed outside the MHPA, within the project footprint.
California horned lark	<i>Eremophila alpestris actia</i>	CDFG CSC	California horned lark was observed in the east-central and south-central portions of the Sycamore Estates site. Observed within the project footprint and also within the MHPA.
White-tailed kite	<i>Elanus leucurus</i>	Nesting	One white-tailed kite was observed in the south-central portion of the Sycamore Estates site outside of the project footprint.
Southern California rufous-crowned sparrow	<i>Aimophila ruficeps canescens</i>	USFWS FSC, CDFG CSC, MSCP	Southern California rufous-crowned sparrow was observed in the within the sage scrub and chaparral habitats on the Montecito and Sycamore Estates.
Cooper's hawk	<i>Accipiter cooperii</i>	Nesting, CDFG CSC, MSCP	Cooper's hawk was observed in the eastern, northern and western portions of the Rancho Encantada site within the MHPA. Observed within the Montecito footprint.

COMMON NAME	SCIENTIFIC NAME	STATUS*	LOCATION
Northern harrier	<i>Circus cyaneus</i>	CDFG CSC, MSCP	Northern harrier was observed flying overhead. They may forage on both sites but not expected to nest on either site.
Grasshopper sparrow	<i>Ammodramus savannarum</i>	San Diego County Species of Concern	Grasshopper sparrow was observed within the south-central portion of the Sycamore Estates site, within the project footprint.
San Diego black-tailed jackrabbit	<i>Lepus californica bennettii</i>	USFWS FSC, CDFG CSC	San Diego black-tailed jackrabbit was observed in the western portion of the Montecito site, within the project footprint and observed on the Sycamore Estates site.

Source: HELIX Environmental Planning; September 18, 2000

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U.S. Fish and Wildlife Service (USFWS)

- FE Federally listed endangered
- FSC Federal special concern species (a "term of art" for former Category 2 candidates)

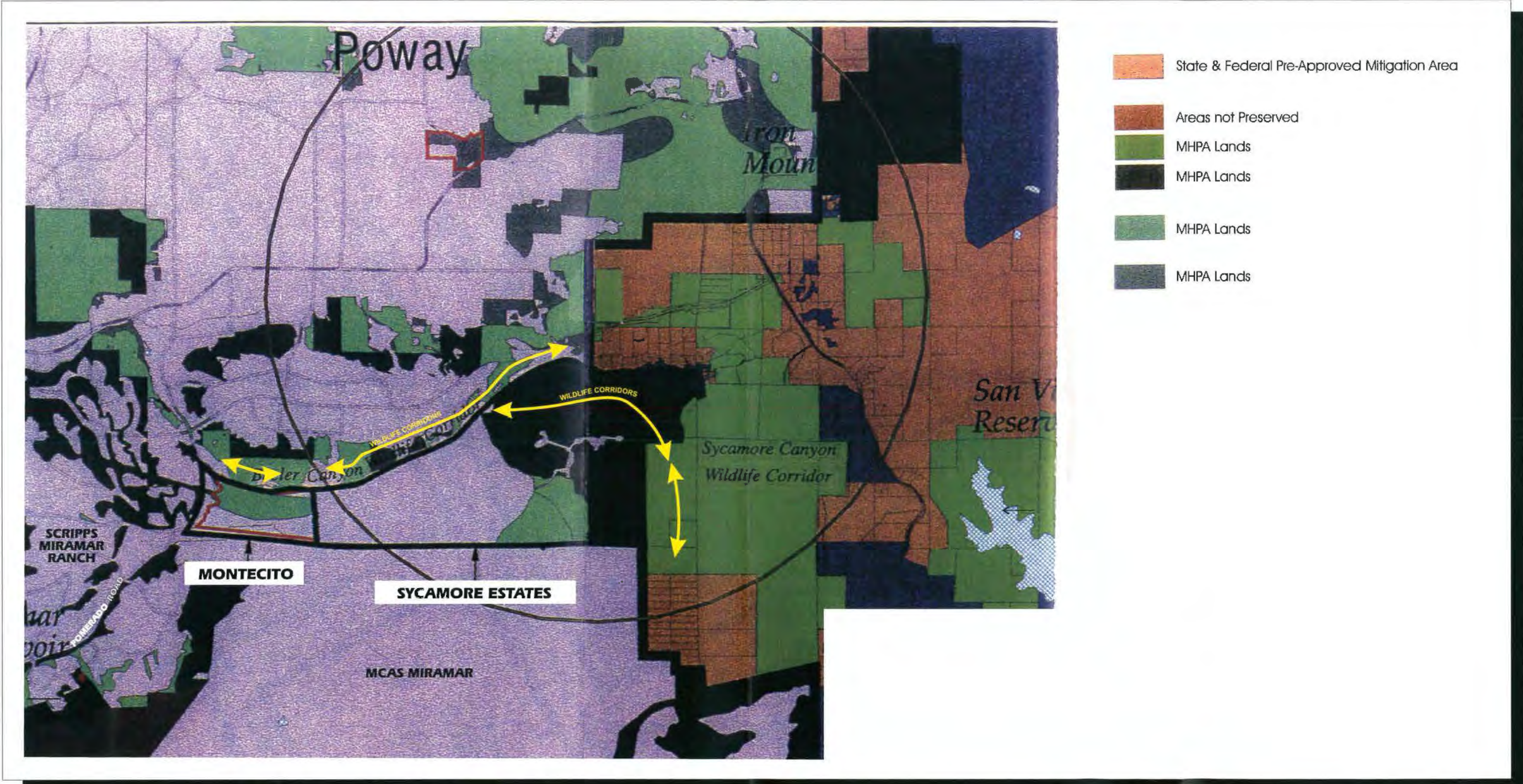
California Department of Fish and Game (CDFG) Multiple Species Conservation Program (MSCP)

- SE State listed endangered
- MSCP = Multiple Species Conservation Program covered species.

WILDLIFE CORRIDORS/LINKAGES

Two regional wildlife corridors are mapped by the City of Poway's Final MSCP on or adjacent to the Project: Beeler Canyon, an east-west corridor, along the northern Project boundary, and Sycamore Canyon, a north-south corridor, along the eastern MHPA boundary (see Figure 4.3-43, *Wildlife Corridors/Linkages*). The adjacent open space area within the City of Poway, upon which the east-west Beeler Canyon Regional Wildlife Corridor is mapped, consists of natural habitats including the existing drainage within Beeler Canyon and the southern-facing slopes of Beeler Canyon. These slopes consist of part natural habitat and part revegetated natural habitat. The revegetated areas are associated with former fill activities from development along Scripps-Poway Parkway. The width of the undeveloped portion of Beeler Canyon within the City of Poway ranges from approximately 1,200 feet to 1,600 feet.

The Sycamore Canyon regional wildlife corridor occurs at the eastern edge of the MHPA portion of the Sycamore Estates sub-project site which is planned for open space.



SOURCE: COUNTY OF SAN DIEGO MSCP-SUB-AREA PLAN 5/18/00



Figure 4.3-3
WILDLIFE CORRIDORS / LINKAGES

□ ENVIRONMENTAL PLANNING CONTEXT

The Multiple Species Conservation Program (MSCP) is a comprehensive habitat conservation planning program for southwestern San Diego County. The City of San Diego's MSCP Subarea Plan was approved in March 1997. The MSCP Subarea Plan is a plan and process for the issuance of permits under the federal and state Endangered Species Acts and the California Natural Communities Conservation Planning (NCCP) Act of 1991. The primary goal of the MSCP Subarea Plan is to conserve viable populations of sensitive species and to conserve regional biodiversity while allowing for reasonable economic growth. The project site is located in the Northern MSCP study area, as indicated by the City of San Diego MSCP Subarea Plan (see Figure 2-9, *MSCP Subarea Plan - Northern Area*).

The *Rancho Encantada* project encompasses approximately 1,443.5 acres within the MSCP's Multiple Habitat Planning Area (MHPA). The Montecito sub-project site encompasses 89.5 acres of the MHPA, the Sycamore Estates sub-project site encompasses 1,106 acres within the MHPA, and the City of San Diego owned parcel encompasses 248.0 acres within the MHPA.

4.3.2 IMPACT ANALYSIS

Issue 1: *What direct and indirect impacts to sensitive species, important habitat or plant and animal diversity would occur as a result of the proposed project?*

Significance Criteria

Implementation of the proposed Project would have significant impacts if it were to substantially effect an endangered, rare or threatened species of animal or plant or the habitat of the species. Impacts are defined as actions that remove, damage, alter or affect the biological resources of the site. Impacts can be direct or indirect, temporary or permanent. Direct impacts of the project include filling of wetland habitat; removal of vegetation and plants; potential loss of wildlife species or loss or alteration of plant or wildlife habitats, foraging areas or breeding requirements. Direct impacts to over 0.1-acre of upland habitat or 0.01-acre of wetland habitat would be considered significant. Indirect impacts include, but are not limited to: a) the introduction of urban meso-predators into a biological system; b) the introduction of urban run-off into a biological system; c) the introduction of invasive exotic plant species into a biological system; d) noise and lighting impacts; e) loss of a biological buffer, such as a wetland buffer; f) alteration of a dynamic portion of a system, such as stream flow characteristics of fire cycles; and g) introduction of urban uses near a wetland.

Impact Analysis

Impacts resulting from implementation of the Montecito and Sycamore Estates sub-projects and their associated off-site improvements are analyzed below. It is anticipated that the sub-projects would be developed independently of one another and, therefore, the impact analysis covers the individual sub-projects separately. Impacts associated with implementation of the proposed *Rancho Encantada*

Precise Plan are the combined impacts associated with the Montecito and Sycamore Estates sub-projects.

□ **VEGETATION COMMUNITY IMPACTS (DIRECT IMPACTS)**

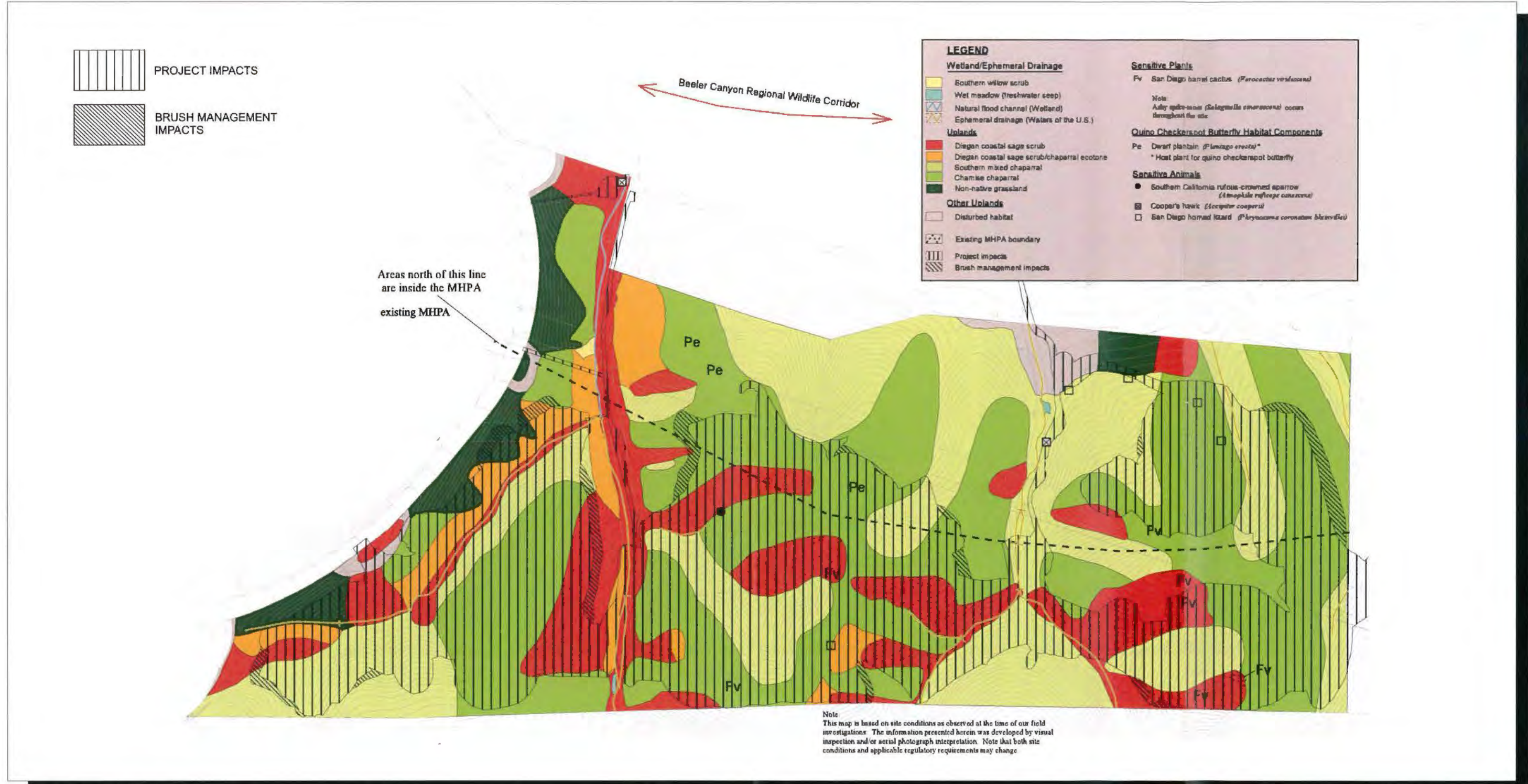
Because an MHPA boundary change is proposed by the Project, and because the proposed MHPA modification is determined to be functionally equivalent to the existing MHPA (as discussed below under Issue 2), development impacts were assumed to be entirely outside the MHPA. The only exception is for the proposed sewer pump station and utility improvements that are proposed within the MHPA.

Vegetation Community Impacts of the Montecito Sub-Project

Implementation of the proposed Montecito sub-project would result in the direct loss of the vegetation community acreages presented in Table 4.3-5, *Direct Impacts to Biological Resources: Montecito Sub-Project*. This table and Figure 4.3-4, *Montecito Vegetation and Sensitive Species Impacts*, describe the impacts associated with implementation of the sub-project. Impacts caused by brush management zone 2 occurring outside of the limits of grading are included in the "Preserved On-Site" column and are considered "impact neutral" meaning that mitigation is not required, but preservation cannot be claimed. Impacts to 0.01-acre of wetland habitat (natural flood channel) 39.4 acres of Tier II habitat, 108.5 acres of Tier IIIA habitat and 2.7 acres of Tier IIIB habitat are regarded as a significant direct impact to sensitive habitat. Impacts to disturbed land and ephemeral drainages are not significant because these habitat types are not considered sensitive.

In addition to the on-site impacts tabulated above, implementation of the Montecito sub-project would result in an off-site grading impact to 0.5-acre of Tier IIIA habitat on the Sycamore Estates sub-project site. If the Montecito sub-project occurs prior to the Sycamore Estates sub-project, an additional 1.5 acres of Tier IIIA habitat would be impacted that would otherwise be impacted by the Sycamore Estates sub-project. This also regarded as a significant direct impact.

A sewer pump station and off-site gravity sewer line are proposed as design options on the Montecito sub-project site and off-site, respectively. Responsibility for impacts caused by construction of the sewer design option that is selected would be either assumed by the owner/permittee of the Montecito or Sycamore Estates sub-project, depending on which sub-project develops first. Significant impacts resulting from the pump station would include 0.02-acre of natural flood channel (wetland), 0.8-acre of Tier II habitat, 0.1-acre of Tier IIIA habitat and 0.1-acre of Tier IIIB habitat. As a design alternative to constructing the sewer pump station, an off-site gravity sewer line is proposed in the City of Poway. Off-site impacts resulting from this off-site design option are discussed below under the heading "Vegetation Community Impacts of the Sewer Design Options." Vegetation community impact acreages for each of the sewer options are tabulated in Table 4.3-8.



SOURCE: HELIX ENVIRONMENTAL PLANNING

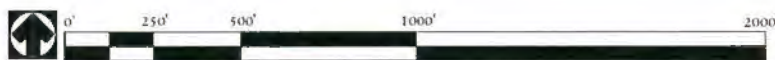


Figure 4.3-4
MONTECITO
DIRECT IMPACTS TO BIOLOGICAL RESOURCES

Table 4.3-5
DIRECT IMPACTS TO BIOLOGICAL RESOURCES: MONTECITO SUB-PROJECT

VEGETATION COMMUNITY	ACREAGE			
	Tier	Existing	Impacts	Preserved
Wetland/Riparian Habitats				
Southern Willow Scrub	Wetland	0.17	0.00	0.17
Wet Meadow (Freshwater Seep)	Wetland	0.11	0.00	0.11
Natural Flood Channel	Wetland	0.16	0.01	0.15
TOTAL Wetland/Riparian Habitats		0.44	0.01	0.43
Ephemeral Drainage				
Ephemeral Drainage	ACOE/CDFG Jurisdictional Wetland	0.64	0.39	0.25
TOTAL Ephemeral Drainage		0.64	0.39	0.25
Tier II (Uncommon Uplands)				
Diegan Coastal Sage Scrub (including disturbed)	Tier II	50.1	32.4	17.7
Diegan Coastal Sage Scrub/Chaparral Ecotone	Tier II	13.4	7.0	6.4
TOTAL Tier II		63.5	39.4	24.81
Tier IIIA (Common Uplands)				
Southern Mixed Chaparral (including disturbed)	Tier	84.2	38.9 ^{1,3}	45.3
Chamise Chaparral (including disturbed)	Tier IIIA	111.5	69.6 ²	41.9
TOTAL Tier IIIA		195.7	108.5²	87.2
Tier IIIB (Common Uplands)				
Non-native Grassland	IIIB	12.6	2.7	9.9
TOTAL Tier IIIB		12.6	2.7	9.9
Tier IV (Other Uplands)				
Disturbed	IV	5.2	1.4	4.1
TOTAL Tier IV		5.2	1.4	4.1
TOTAL ACREAGE + OFF-SITE IMPACTS		278.1	152.4^{1,2}	125.7
TOTAL ON -SITE IMPACTS		--	151.9	--
TOTAL IMPACTS IF MONTECITO PRECEDES SYCAMORE ESTATES		--	153.9³	--

1. Includes 0.3-acre of off-site impacts.

2. Includes 0.2-acre of off-site impacts.

3. If the Montecito Project occurs prior to the proposed Sycamore Estates project, an additional 1.5 acres of southern mixed chaparral would be impacted that would otherwise be impacted by the Sycamore Estates project. Sewer pump station and gravity sewer design option impacts are not included in these acreages.

Source: HELIX Environmental Planning; October 3, 2000

Vegetation Community Impacts of the Sycamore Estates Sub-Project

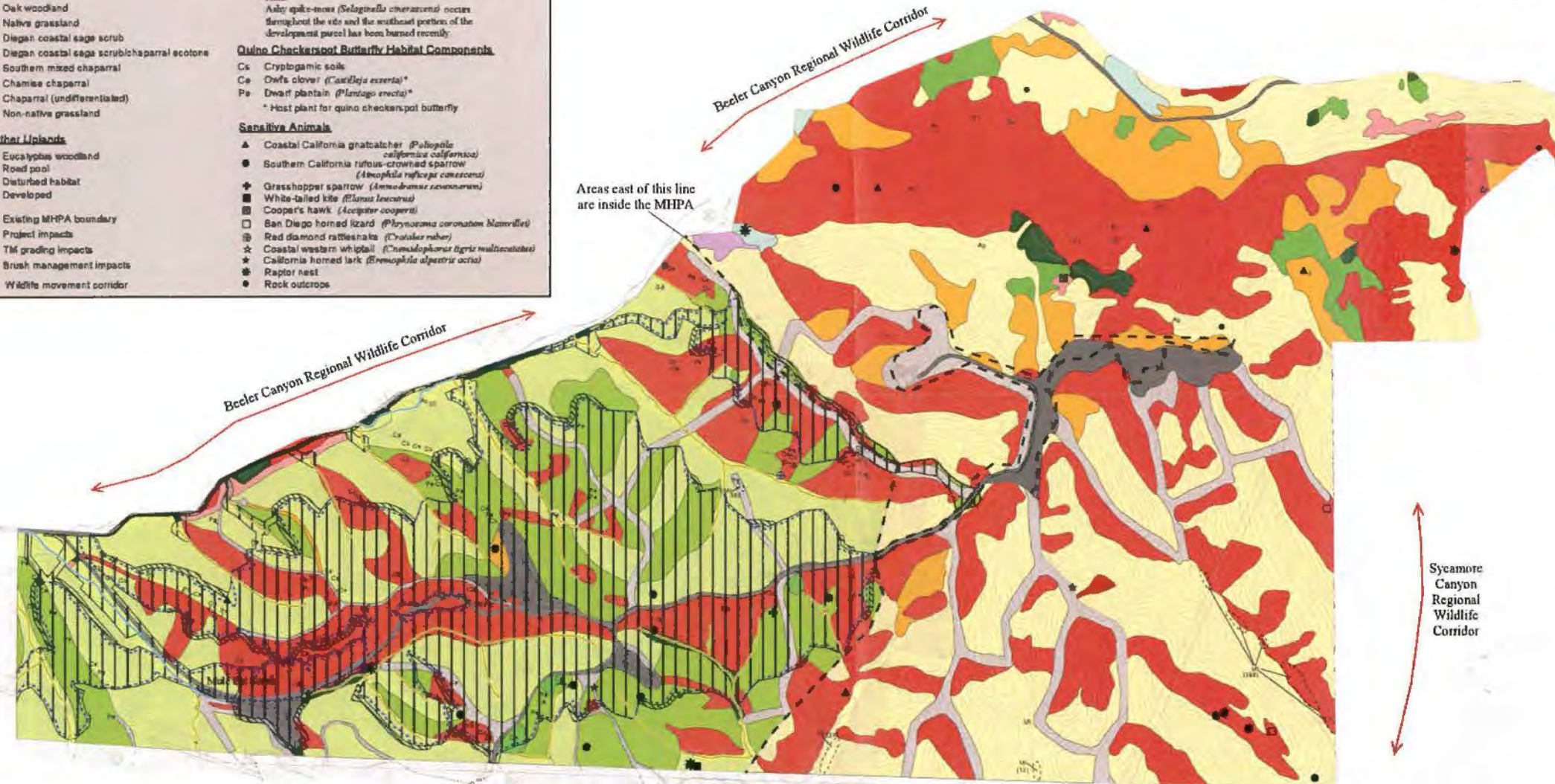
Implementation of the proposed Sycamore Estates sub-project would result in the direct loss of the vegetation community acreages presented in Table 4.3-6, *Direct Impacts to Biological Resources: Sycamore Estates Sub-Project* (the acreages of existing habitat shown in Table 4.3-6 only reflect Sycamore Estates' development parcel). Because the proposed Project's MHPA boundary has been determined to be functionally equivalent to the existing MHPA, all development impacts are calculated as occurring outside of the MHPA with the exception of a 2.5-acre impact area on the City of San Diego owned parcel caused by the construction of an access road to Sycamore Estates' proposed Planning Area 11. Pursuant to the MSCP, impacts caused by brush management zone 2 beyond the limits of grading are considered "impact neutral," meaning that mitigation is not required, but preservation credit cannot be claimed. Although preservation credit cannot be claimed, land on which Zones 2 management occurs can be located within the MHPA. Direct impacts to 0.53-acre of natural flood channel (wetland), 4.4 acres of Tier I habitat, 144.7 acres of Tier II habitat, 363.6 acres of Tier IIIA habitat and 4.1 acres of Tier IIIB habitat would be significant. Impacts to developed and disturbed areas, ephemeral drainages and Tier IV habitats would not be significant because these habitats are not considered sensitive.

If the Sycamore Estates sub-project of the overall *Rancho Encantada* project develops prior to development of the Montecito sub-project, it would be necessary for the developers of Sycamore Estates to construct Rancho Encantada Parkway across the Montecito sub-project site to gain access. In this case, grading and construction of Rancho Encantada Parkway across the Montecito sub-project site would be regarded as an off-site improvement of the Sycamore Estates VTMM. Implementation of the off-site improvements would result in the direct loss of the vegetation community acreages presented in Table 4.3-7, *Direct Impacts to Biological Resources: Sycamore Estates Sub-Project Off-Site Rancho Encantada Parkway Improvements*. The loss of these habitats would be regarded as significant, with the exception of impacts to developed and disturbed land, which are not considered sensitive.

Two sewer design options are proposed as part of the Project: a sewer pump station on the Montecito sub-project site, or a gravity sewer line in the City of Poway. Off-site impacts resulting from these design options are discussed below under the heading "Vegetation Community Impacts of the Sewer Design Options." Vegetation community impact acreages for each of the sewer options are tabulated in Table 4.3-8. Responsibility for impacts caused by construction of the sewer pump station or the gravity sewer line would be either assumed by the owner/permittee of the Montecito or Sycamore Estates sub-project, depending on which sub-project develops first.

LEGEND	
Wetland/Ephemeral Drainage	
	Mule fat scrub
	Riparian scrub
	Natural flood channel (Wetland)
	Ephemeral drainage (Waters of the U.S.)
Uplands	
	Oak woodland
	Native grassland
	Diegan coastal sage scrub
	Diegan coastal sage scrub/chaparral ecotone
	Southern mixed chaparral
	Chamise chaparral
	Chaparral (undifferentiated)
	Non-native grassland
Other Uplands	
	Eucalyptus woodland
	Road pool
	Disturbed habitat
	Developed
	Existing MHPA boundary
	Project impacts
	TM grading impacts
	Brush management impacts
	Wildlife movement corridor
Sensitive Plants	
Ml	Willow manardella (<i>Manardella (monda) ssp. virens</i>)
Dv	Variegated dudleya (<i>Dudleya variegata</i>)
Mc	San Diego golden star (<i>Diella clelandii</i>)
Gd	Mission Canyon blue oak (<i>Quercus dumosa</i> ssp. <i>filiculis</i>)
Fv	San Diego barrel cactus (<i>Ferocactus viridescens</i>)
Ap	San Diego sagewort (<i>Artemisia palmata</i>)
Oc	California adder's tongue fern (<i>Ophloglossum californicum</i>)
Note: Ashy spike-moss (<i>Selaginella chrysocoma</i>) occurs throughout the site and the southeast portion of the development parcel has been burned recently.	
Quino Checkerspot Butterfly Habitat Components	
Cs	Cryptogamic soils
Ca	Owls clover (<i>Castilleja exserta</i>)*
Pa	Dwarf plantain (<i>Plantago erecta</i>)*
* Host plant for quino checkerspot butterfly	
Sensitive Animals	
▲	Coastal California gnatcatcher (<i>Polioptila californica californica</i>)
●	Southern California rufous-crowned sparrow (<i>Amphispiza ruficeps canescens</i>)
◆	Grasshopper sparrow (<i>Ammodramus leucurus</i>)
■	White-tailed kite (<i>Elanus leucurus</i>)
■	Cooper's hawk (<i>Accipiter cooperii</i>)
□	San Diego horned lizard (<i>Phrynosoma coronatum Mearnsii</i>)
⊗	Red diamond rattlesnake (<i>Crotalus ruber</i>)
☆	Coastal western whiptail (<i>Cnemidophorus tigris multicaudatus</i>)
★	California horned lark (<i>Bonaparteia alpestris acuta</i>)
●	Raptor nest
●	Rock outcrops

	PROJECT IMPACTS
	BRUSH MANAGEMENT IMPACTS



Note
This map is based on site conditions as observed at the time of Helix's field investigations. The information presented herein was developed by visual inspection and/or aerial photograph interpretation. Note that both site conditions and applicable regulatory requirements may change.

SOURCE: HELIX ENVIRONMENTAL PLANNING

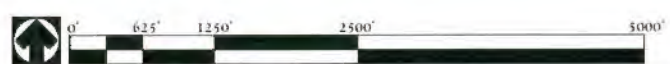


Figure 4.3-5
SYCAMORE ESTATES
VEGETATION AND SENSITIVE SPECIES IMPACTS

Table 4.3-6
DIRECT IMPACTS TO BIOLOGICAL RESOURCES: SYCAMORE ESTATES SUB-PROJECT

VEGETATION COMMUNITY	ACREAGE			
	Tier	Existing +	Impacts	Preserved +
Wetlands/Riparian				
Mule Fat Scrub	Wetland	0.06	-	0.06
Natural Flood Channel ¹	Wetland	0.70	0.53	0.17
TOTAL Wetland/Riparian		0.76	0.53	0.23
Ephemeral Drainage				
Ephemeral Drainage	ACOE/CDFG Jurisdictional Wetland	1.82	0.86	0.96
TOTAL Ephemeral Drainage		1.82	0.86	0.96
Tier I (Rare Uplands)				
Coast Live Oak Woodland	Tier I	4.9	0.9	4.0
Native Grassland	Tier I	4.0	3.5	0.5
TOTAL Tier I		8.9	4.4	4.5
Tier II (Uncommon Uplands)				
Diegan Coastal Sage Scrub (including disturbed)	Tier II	221.3	142.0 ⁶	79.3
Diegan Coastal Sage Scrub/Chaparral Ecotone	Tier II	3.0	2.7	0.3
TOTAL Tier II		224.3	144.7	79.6
Tier IIIA (Common Uplands)				
Chaparral (undifferentiated) ²	Tier IIIA	8.4	--	8.4
Southern Mixed Chaparral (including disturbed)	Tier IIIA	424.5	221.9	202.6 (202.3) ³
Chamise Chaparral (including disturbed)	Tier IIIA	220.8	141.7 ⁷	79.1 (78.9) ³
TOTAL Tier IIIA		653.7	363.6	290.1
Tier IIIB (Common Uplands)				
Non-native Grassland	Tier IIIB	8.5	4.1	4.4
TOTAL Tier IIIB		8.5	4.1	4.4
Tier IV (Other Uplands)				
Eucalyptus Woodland	Tier IV	0.3	0.3	0.0
Road Pool ⁴	Tier IV	<0.01	--	<0.01
Disturbed	Tier IV	41.5	36.1	5.4
Developed	Tier IV	39.7	35.9	3.8
TOTAL Tier IV		81.5	72.3	9.2
TOTAL ACREAGE		979.5	590.5⁵	389.0
TOTAL IMPACTS IF MONTECITO PRECEDES SYCAMORE ESTATES			589.0⁵	

1. Natural flood channel and ephemeral drainages were not delineated for the eastern MHPA area.
2. MBA (1993) survey did not distinguish between the two types of chaparral habitat found on site; however, HELIX did resurvey areas proposed to be impacted and acreage totals have been adjusted accordingly.
3. 0.3 acre of southern mixed chaparral and 0.2 acre of chamise chaparral will be impacted by the proposed Montecito project.
4. Included in acreage for disturbed habitat.
5. In the circumstance that the Montecito project develops prior to the Project, Project impacts to southern mixed chaparral would be decreased by 1.5 acres.
6. Includes 0.8 acre of off-site impact.
7. Includes 0.9 acre of off-site impact.

+ This Table does not include eastern MHPA area totaling 1,152.6 acres of open space.

+ This Table does include impacts caused by road improvements on the City of San Diego owned parcel, including 0.5-acre of Diegan coastal sage scrub, 0.6-acre of southern mixed chaparral and 1.4 acres of disturbed.

Source: HELIX Environmental Planning; September 18, 2000

Table 4.3-7
DIRECT IMPACTS TO BIOLOGICAL RESOURCES: SYCAMORE ESTATES SUB-PROJECT
OFF-SITE RANCHO ENCANTADA PARKWAY IMPROVEMENTS

Vegetation Community	Tier	ACREAGE Rancho Encantada Parkway Impact (Outside the MHPA on the Montecito Sub-Project Site)
Diegan Coastal Sage Scrub (including disturbed)	II	11.2
Diegan Coastal Sage Scrub/ Chaparral Ecotone	II	2.5
TOTAL TIER II		13.7
Southern Mixed Chaparral (Including disturbed)	IIIA	9.5
Chamise Chaparral (Including disturbed)	IIIA	14.6
TOTAL TIER IIIA		24.1
Developed	IV	--
Disturbed	IV	0.2
TOTAL TIER IV		0.2
TOTAL ACREAGE		38.0

Source: HELIX Environmental Planning; September 18, 2000

Vegetation Impacts of the Sewer Design Options

Two sewer design options are proposed as part of the Project: either the construction of a sewer pump station on the Montecito sub-project site, or the construction of an off-site gravity sewer line in the City of Poway. Vegetation community impact acreages for each of the sewer options are tabulated in Table 4.3-8. Impact calculations are based on a 20-foot-wide construction easement. Responsibility for impacts caused by construction of the sewer pump station or the gravity sewer line would be assumed by either the Montecito sub-project or the Sycamore Estates sub-project, depending on which sub-project develops first. Under the lift station option, the existing sewer main in Pomerado Road would be extended southward approximately 1,200 feet to intercept the lifted flow. Under the gravity sewer line option, improvements would be necessary starting at the intersection of Beeler Canyon Road and Creek Road. The line would be installed in segments of Creek Road, Stage Stop Road, Old Pomerado Road and Pomerado Road, which are mapped as disturbed habitat. In two areas, the proposed gravity sewer improvements would be constructed outside of roadway rights-of-way and would impact sensitive vegetation as shown on Figure 4.3-6, *Off-Site Gravity Sewer Option Vegetation Impacts*.



Note:
This map is based on site conditions as observed at the time of Helix's field investigations. The information presented herein was developed by visual inspection and/or aerial photograph interpretation. Note that both site conditions and applicable regulatory requirements may change.

**Figure 4.3-6
OFF-SITE GRAVITY SEWER OPTION
VEGETATION IMPACTS**



**Table 4.3-8
DIRECT IMPACTS TO BIOLOGICAL RESOURCES
SEWER DESIGN OPTIONS**

VEGETATION COMMUNITY		TIER LEVEL	OFF-SITE GRAVITY SEWER ALIGNMENT OPTION (In the City of Poway)	SEWER PUMP STATION OPTION (On the Montecito Sub-Project Site)
MFS	Mulefat Scrub	Wetland	0.02	--
SWS	Southern Willow Scrub	Wetland	0.02	--
FM	Freshwater Marsh	Wetland	0.01	--
WM	Wet Meadow (freshwater seep)	Wetland	0.01	--
NFC	Natural Flood Channel	Wetland	0.02	0.02
Total Wetlands			0.08	0.02
OW	Coast Live Oak Woodland	I	0.3	
CSS	Diegan Coastal Sage Scrub (& disturbed)	II	0.1	0.8
CC	Chamise Chaparral (& disturbed)	IIIA		0.1
NNG	Non-Native Grassland	IIIB	0.1	0.1
DEV	Developed	--	3.4	--
D	Disturbed	IV	0.1	--
Total Uplands			4.0	--
TOTAL			4.08	1.02

Source: HELIX Environmental Planning; September 18, 2000

□ SENSITIVE PLANT SPECIES IMPACTS (DIRECT IMPACTS)**Montecito Sub-Project**

Two sensitive plant species occupy the Montecito sub-project site (San Diego barrel cactus and ashy spike-moss). The San Diego barrel cactus occurs mostly in coastal sage scrub while ashy-spike moss occurs in both coastal sage scrub and chaparral habitats. Direct impacts would occur to approximately 11 San Diego barrel cactus and numerous ashy spike-moss. These impacts would not be considered significant due to their low sensitivity. Overall, the population on the Montecito sub-project site is small and other populations would be preserved on site in the adjacent open space. Spike-moss is common throughout the site and the population would be maintained in the remaining habitat.

Sycamore Estates Sub-Project

On the Sycamore Estates sub-project, no direct impacts to the federal and state listed endangered willowy monardella would occur as this species is located only within the eastern MHPA area that is not proposed for development. The portion of the MHPA east of Planning Area 11 proposed for development has been surveyed, however, and no sensitive plant species are located in this MHPA area. As discussed below under "Indirect Impacts," the willowy monardella population also would not be significantly impacted in an indirect manner by urban runoff or a reduction in the size of its watershed. No direct impacts are anticipated to variegated dudleya, Mission Canyon bluecup, San Diego goldenstar, California adder's-tongue fern, or San Diego sagewort. Impacts would occur to approximately 39 San Diego barrel cactus and numerous ashy spike-moss. These impacts are not considered significant due to their low sensitivity and/or their status as a covered species under the MSCP. There would also be no significant impacts to sensitive plant species on the Montecito sub-project site as a result of constructing Rancho Encantada Parkway and/or the sewer lift station as off-site improvements.

Off-Site Gravity Sewer Alignment Design Option

No sensitive plant or animal species were observed during surveys of the off-site gravity sewer line. The potential for City of San Diego narrow endemics is considered very low. San Diego thornmint, Shaw's agave, aphanisma, coastal dunes milk vetch, short-leaved live-forever, Otay tarplant, prostrate navarretia, snake cholla, California orcutt grass, San Diego mesa mint, and Otay mesa mint are not expected to occur within the alignment because there is no appropriate habitat for these species, and/or the site is well outside of the species known range of occurrence. San Diego ambrosia and Encinitas baccharis would likely have been detected if present. One other high sensitivity species known from the project area, willowy monardella, would have been observed if present. Therefore, no sensitive plant species are assumed in the disturbance area for the gravity sewer line alignment, and no impacts would occur.

☐ SENSITIVE WILDLIFE SPECIES IMPACTS (DIRECT IMPACTS)

Montecito Sub-Project

Implementation of the proposed sub-project would result in impacts to habitat for the San Diego horned lizard, orange-throated whiptail, Cooper's hawk, southern California rufous-crowned sparrow, and San Diego black-tailed jackrabbit. These impacts are not regarded as significant due to their low sensitivity status and/or because they are a covered species under the MSCP Subarea Plan. Sufficient habitat for these species observed on-site would be maintained through conservation within the MHPA in the vicinity of the sub-project. Cumulative impacts to raptor forging habitat would occur due to the loss of Diegan coastal sage scrub and non-native grassland habitats. This impact is regarded as cumulatively significant. Impacts to non-native grassland are of special concern and although project-related impacts to all sensitive biological resources will be mitigated in accordance with the MSCP, project-related impacts to non-native grasslands remain significant under CEQA (see Section 5.0, CUMULATIVE EFFECTS). If active raptor nests are found on- or off-site in areas proposed for construction, impacts to occupied raptor nests would be regarded as significant, and mitigation (avoidance) would be required.

Sycamore Estates Sub-Project

Impacts would occur to an individual coastal California gnatcatcher outside of the MHPA. Impacts to the coastal California gnatcatcher are considered significant; however, it is a covered species under the MSCP. Impacts also would occur to the California horned lark, grasshopper sparrow, southern California rufous-crowned sparrow, and coastal western whiptail. Impacts to these species are not considered significant due to their low sensitivity status and/or because they are covered species under the MSCP. Cumulative impacts to raptor forging habitat would occur due to the loss of Diegan coastal sage scrub and grassland habitats. This impact is regarded as cumulatively significant (see Section 5.0, CUMULATIVE EFFECTS). If active raptor nests are found on- or off-site in areas proposed for construction, impacts to occupied raptor nests would be regarded as significant and mitigation (avoidance) would be required.

☐ INDIRECT IMPACTS

Project-Wide Indirect Impacts

Indirect impacts to vegetation communities and sensitive plant species could result from adverse "edge effects." Long-term indirect impacts on vegetation communities most typically would occur as a result of trampling of vegetation by humans and domestic pets, predation by domestic pets, invasion by exotic plant species, alteration of the natural fire regime, and exposure to urban pollutants. Increased urban pollutants would include oil, fine dust, chemicals, and other materials. Indirect effects associated with implementation of the *Rancho Encantada* project, however, would be minimized by the use of fencing between residential and open space areas, shielded lighting near MHPA areas and incorporation of water quality measures identified in Sections 4.4 and 4.5 of this EIR. The overall MSCP preserve is planned to benefit from long-term management efforts that should minimize indirect effects associated with adjacent development. These management efforts include fencing along the development edge and signage along trails to reduce intrusion into the preserve.

Adverse edge effects caused by implementation of the Project could indirectly effect existing habitat linkages and movement. Development of the Project would bring wildlife into more frequent contact with humans, domestic pets, and other human-generated sources of disturbance (litter, exotic species, toxic chemicals, etc.). Wildlife mortality could become more frequent because of collisions with vehicles. Lighting and noise have the potential to inhibit movement by nocturnal species. Overall preserve management efforts would be directed toward minimization of indirect effects to wildlife movement (see Section 4.1, LAND USE, for an analysis of Project consistency with the City's MHPA Land Use Adjacency (LUA) Guidelines and issue Number 2 beginning on page 4.3-21).

In summary, the LUA Guidelines contained in the MSCP Subarea Plan provide a list of issues to be addressed for projects within or adjacent to the MHPA Preserve. These issues include drainage, toxics, lighting, noise, barriers, invasive and brush management. Both the Montecito and Sycamore Estates sub-projects propose the use of detention basins and water quality filtration basins to filter water before being released into the MHPA. Additionally, both sub-projects propose to shield and direct light away from the MHPA and to install walls or fences between development and the MHPA. All grading and brush management zone one areas would be located outside of the MHPA, and the sub-projects' Conceptual Landscape Plans call for all exterior manufactured slopes adjacent to the MHPA to be vegetated with native plant species that are compatible with the existing native vegetation of the site. During construction of the Project, edge effects may include dust which could disrupt plant vitality in the short term, construction and post-construction soil erosion and runoff, and construction related noise impacts to the coastal California gnatcatcher. Construction and post-construction measures including dust and erosion controls would be implemented to reduce these effects (see Sections 4.4, GEOLOGY/SOILS, 4.5, HYDROLOGY/WATER QUALITY, and 4.8, AIR QUALITY). As concluded in Section 4.1, LAND USE, the proposed Project would be consistent with the MSCP's LUA Guidelines.

The City's Biology Guidelines (City of San Diego 1999) state that "a wetland buffer shall be maintained around all wetlands as appropriate to protect the functions and values of the wetlands. These include wildlife habitat, food chain productivity, water quality, ground water recharge, and areas for the protection from storm and floodwaters. Wetland buffers should be provided at a minimum 100 feet wide adjacent to all identified wetlands. The width of the buffer may be either increased or decreased as determined on a case-by-case basis, in consultation with the CDFG, the USFWS and the ACOE, taking into consideration the type and size of development, the sensitivity of the wetland resources to detrimental edge effects, natural features such as topography, the functions and values of the wetland and the need for upland transitional habitat." An evaluation of potential indirect impacts to wetlands and wetland buffers is provided below for each sub-project.

Montecito Sub-Project

Wetland buffers: A wet meadow (freshwater seep) is located directly adjacent to and south of proposed Rancho Encantada Parkway, the primary access through the site. Rancho Encantada Parkway would be aligned to the north to avoid direct impacts to the freshwater seep and minimize indirect impacts. No development would occur to the west, south, or east where a large majority of the watershed for the wetland occurs. The roadway alignment has been designed to provide a 25-foot natural buffer to the north of the wetland. Approximately 25 feet north of the wetland, a retaining wall is proposed. The proposed construction of Rancho Encantada Parkway would also provide a vegetated buffer (manufactured slope) of up to 100 feet along the northern boundary; thus, indirect impacts would not

occur. Because a majority of the watershed for the wetland lies upstream of any proposed development, the functions and values of the watershed would be maintained. This is especially true for groundwater recharge, water quality, and protection from storm and floodwaters. Any increases in flows generated from the slope for Rancho Encantada Parkway are anticipated to be minor as they represent only a small portion of the total watershed for the wet meadow. Habitat values would also be retained by preservation of a large majority of the watershed in an undisturbed state. Buffering of the wet meadow is considered adequate. Short-term impacts associated with construction would be minimized by the placement of silt fencing along the development/buffer boundary and/or other sediment prevention measures specified in the sub-project's Storm Water Pollution Prevention Plan (SWPPP) necessary to minimize erosion impacts to wetlands.

The other wetlands on-site include the natural flood channels and southern willow scrub in the northwestern portion of the sub-project site, and wet meadow in the north-central portion of the site. The natural flood channel and southern willow scrub would be surrounded by natural vegetation with the exception of a sewer/water access road. This access road would encroach to within 30 feet of the eastern boundary of the natural flood channel. Additionally, two sewer easements would cross the natural flood channel, and one would encroach to within 40 feet of the southern willow scrub. The access road would be used very infrequently, which would minimize impacts typically associated with roadways. Given the small size of the drainage, the complete lack of wetland vegetation in the channel, and the very limited use of the access road, the buffer between the natural flood channel and access road would be considered adequate. Similarly, buffering of the southern willow scrub would be also considered adequate. Short-term impacts associated with construction would be minimized by the placement of silt fencing along the development/buffer boundary. A sewer access road is also proposed within 30 feet of the wet meadow in the north-central portion of the site. Native vegetation would be retained in open space to the north, west, and south. As noted above, the access road would receive limited use and would not significantly impact the functioning of this wet meadow. Proposed buffering in this area would be considered adequate in this case and no indirect impacts would occur. No other indirect impacts would occur beyond those identified above under "Project-Wide Indirect Impacts."

Sycamore Estates Sub-Project

Variegated dudleya: Potentially significant indirect impacts which could occur as a result of developing residential uses in close proximity to variegated dudleya have been considered in the design of the Sycamore Estates sub-project. There are two populations of variegated dudleya on the Sycamore Estates sub-project site, both adjacent to the far eastern area of development. Direct impacts to these populations have been avoided by design. One population is immediately adjacent to a proposed Zone 2 brush management area and the other is located over 100 feet down-slope of any direct impacts. Grading of the Sycamore Estates sub-project is proposed so that the watershed of the population closest to development would not be affected; however, indirect impacts may occur from increased use of the area.

Mission Canyon blue cup: The closest Mission Canyon blue cup population occurs approximately 500 feet from the edge of development on the Sycamore Estates sub-project. The drainage hydrology to this population's surrounding habitat would not be significantly altered by the Project. Indirect impacts to this species are not anticipated.

Willow monardella: The closest willow monardella population occurs approximately 940 feet from the edge of development proposed on the Sycamore Estates sub-project site. Impacts have the potential to occur to willow monardella if drainage is altered significantly from the existing condition where willow monardella occurs. The sub-project has been designed to direct all urban flows away from the willow monardella to avoid indirect impacts to this species. However, potential impacts would occur if irrigation from the project's landscaping was permitted within that watershed. Thus, impacts associated with pollutants contained in runoff would have a potential impact to the willow monardella population. The willow monardella is not considered a wetland plant species, and the drainage in which the plant occurs is ephemeral. The willow monardella receives the greatest percentage of water from direct precipitation, which would not be altered with the proposed development. Although approximately 14 percent of the watershed for the nearest willow monardella population would be diverted, the amount of water available to the population for plant nourishment would not vary significantly from existing conditions. During most 10-year storm events, the stream flow quantities would not vary at all and stream flow quantities for the more infrequent storm events would not vary by more than 14 percent. During the more infrequent events, a 14-percent reduction in stream flow quantity would not result in measurable differences to flow depths, widths, or velocities. Flow velocities for all runoff events are primarily affected by the canyon bottom grade, which is hydraulically steep in this situation. Therefore, scour and sediment transport would not be impacted by the proposed reduction in watershed. Additionally, pursuant to the proposed Sycamore Estates conceptual landscape plan, adjacent slopes would be seeded and planted with native species, and silt trapping best management practices will be required to prevent erosion. Consequently, given the small change in peak flows from the sub-project, significant indirect impacts to the willow monardella associated with water diversion would not occur. Potentially significant short-term sedimentation impacts would occur during construction, but this impact can be mitigated by the use of silt fencing or other similar method.

Wetland buffers: A majority of the wetlands on and immediately off the sub-project site have buffers well in excess of 100 feet, including the southern willow scrub just northeast of the northeastern development edge. The mulefat scrub located in the southwestern portion of the sub-project site currently abuts existing development and is fed by runoff from the Department of Defense facility parking area. The sub-project proposes to grade the area to the north of the mulefat scrub and replace the developed area with a vegetated slope for Rancho Encantada Parkway. There would be approximately 70 feet of distance from the top of the roadway to the mulefat scrub and an approximate 25-foot buffer would be provided to the east. Project open space occurs along the southern and western boundaries of the mulefat scrub. The functions and values of all of the existing native buffer to the south and west would not be impacted. Given the low quality of the existing mulefat scrub (approximately 0.06-acre) and the complete lack of a buffer currently, the resulting vegetated buffer for the sub-project would result in an improved buffer for this wetland. This would include an increase in groundwater recharge, water quality, and wildlife habitat values. Short-term sedimentation impacts associated with construction would be minimized by the placement of silt fencing along the development/buffer boundary.

The other wetland on-site is the natural flood channel in the northwestern portion of the site. This drainage currently occurs directly adjacent to the existing primary access road to the site. This access road would remain but would no longer be used except for periodic maintenance vehicle use. Areas impacted for the creation of detention basins would be revegetated and will have minimum buffers of 200 feet to the west and 100 feet to the east, excluding the existing access road. Non-impacted areas of

this drainage would have larger buffers. Functions and values of the watershed will be adequately maintained. This is especially true for groundwater recharge, water quality, and protection from storm and floodwaters. Habitat values have also been retained by preservation of much of the watershed in an undisturbed state, and by the proposed restoration of the natural flood channel and adjacent upland areas. Short-term impacts associated with construction would be minimized by the placement of silt fencing along the development/buffer boundary. Proposed buffering would be considered adequate and no indirect impacts would occur.

Significance of Impacts

Rancho Encantada Precise Plan

Impacts resulting from the *Rancho Encantada* Precise Plan would be a combination of impacts resulting from the Montecito and Sycamore Estates sub-projects and associated off-site improvements (see below).

Montecito Sub-Project

Impacts to 0.01-acre of wetland habitat, 39.4 acres of Tier II habitat, 108.5 acres of Tier IIIA habitat and 2.7 acres of Tier IIIB habitat, including off-site impacts to 0.5-acre of Tier IIIA habitat on the Sycamore Estates sub-project site would be regarded as significant direct impacts. If the Montecito sub-project precedes the Sycamore Estates sub-project, an additional 1.5 acres of Tier IIIA habitat on the Sycamore Estates sub-project site would be impacted by the Montecito sub-project. This would also be regarded as a significant direct impact. Direct impacts resulting from the sewer design options are discussed below under the heading "Sewer Design Options."

Direct impacts would occur to approximately 11 San Diego barrel cactus and numerous ashy spike-moss; however, because of their low sensitivity, impacts are not regarded as significant. Cumulative impacts to raptor foraging habitat (coastal sage scrub and non-native grassland habitats primarily) would occur due to the loss of Diegan coastal sage scrub and non-native grassland habitats. This impact is regarded as cumulatively significant. Direct impacts would occur to the San Diego horned lizard, orange-throated whiptail, Cooper's hawk, southern California rufous crowned sparrow and San Diego black-tailed jackrabbit. Impacts to these species are not considered significant because the San Diego horned lizard and the Cooper's hawk are covered species under the MSCP and the other species have a low sensitivity status. If active raptor nests are found on- or off-site in areas proposed for construction, impacts to occupied raptor nests would be regarded as significant.

Sycamore Estates Sub-Project

Impacts to 0.53 acres of wetland habitat, 4.4 acres of Tier I habitat, 144.7 acres of Tier II habitat, 363.6 acres of Tier IIIA habitat, and 4.1 acres of Tier IIIB habitat on the Sycamore Estates sub-project site would be regarded as significant direct impacts to sensitive habitat. If the Sycamore Estates sub-project develops prior to the Montecito sub-project, grading and construction of Rancho Encantada Parkway across the Montecito sub-project site would be regarded as off-site improvements of the Sycamore Estates VTM. Impacts to, 13.7 acres of Tier II habitat and 24.1 acres of Tier IIIA habitat resulting from the construction of Rancho Encantada Parkway would be regarded as significant. Direct impacts resulting from the sewer design options are discussed below under the heading "Sewer Design Options."

Impacts would occur to approximately 39 San Diego barrel cactus and numerous ashy spike-moss; however, because of their low sensitivity, impacts are not regarded as significant. Indirect impacts may potentially occur to variegated dudleya as a result of the Sycamore Estates sub-project, which is considered a significant indirect impact. Impacts would occur to an individual coastal California gnatcatcher outside of the MHPA. Impacts to the coastal California gnatcatcher are considered significant; however, it is a covered species under the MSCP and is considered adequately mitigated through the sub-project's conformance with the MSCP and the City's habitat mitigation requirements. Impacts to the coastal western whiptail, California horned lark, grasshopper sparrow, and southern California rufous-crowned sparrow are not considered significant due to their low sensitivity status and/or because they are covered species under the MSCP. Cumulative impacts to raptor foraging habitat would occur due to the loss of Diegan coastal sage scrub and grassland habitats; and significant direct impacts would occur if occupied raptor nests are located in or near construction areas. Indirect impacts to the Mission Canyon blue cup would not be considered significant because the drainage hydrology of this population would not be affected. Significant indirect impacts to variegated dudleya, an off-site population of willow monardella and wetlands with less than 100-foot buffers would also occur. Indirect impacts, including potential construction-related impacts to wetlands with less than 100-foot buffers, would be considered significant, but mitigable.

Sewer Design Options

Implementation of the gravity sewer option would impact 0.08-acre of wetland habitat, 0.3-acre of coast live oak woodland, 0.1-acre of Diegan coastal sage scrub, and 0.1-acre of non-native grassland which are considered sensitive habitats within the City of Poway.

Implementation of the sewer pump station option would impact 0.02-acre of wetland habitat, 0.8-acre of Diegan coastal sage scrub, 0.1-acre chamise chaparral and 0.1-acre of non-native grassland on the Montecito sub-project site.

Mitigation Measures, Monitoring and Reporting Program

To calculate the level of mitigation afforded by on-site preservation, identified impacts to vegetation communities were grouped in habitat tiers based on the City's Upland Mitigation Ratios table, and total mitigation requirements identified; on-site preservation, based on habitat tiers, was subtracted from the total mitigation requirement to determine off-site mitigation requirements, if any. The following

mitigation measures would reduce direct and indirect impacts to below a level of significance. Cumulative impacts to raptor foraging habitat due to the loss of non-native grassland would remain significant and unmitigable.

Mitigation for Upland Habitats

□ MONTECITO SUB-PROJECT

4.3-1: Mitigation for impacts to upland vegetation communities shall consist of on-site preservation and preservation on the Sycamore Estates development parcel's proposed MHPA expansion area in the acreage amounts presented in the table below. Upland vegetation communities shall be mitigated satisfactory to the City of San Diego's Environmental Review Manager of Land Development Review and as specified by criterion a, b and c, below.

Habitat	Impact (outside MHPA)	Mitigation Ratio (preservation area outside/inside MHPA)	On-Site Preservation Inside MHPA	Off-Site Preservation Inside Sycamore Estates MHPA
Tier II				
Diegan Coastal Sage Scrub (DSS)	32.4	1.5:1/1:1	CSS 12.3 ESMC 15.7	3.8
Diegan Coastal Sage Scrub/ Chaparral Ecotone (DSS/CE)	7.0	1.5:1/1:1	DSS/CE 5.2	1.7
Tier IIIA				
Southern Mixed Chaparral (SMC)	38.9 ¹	1:1/0.5:1	CC 0.2 SMC 19.3	0
Chamise Chaparral (CC)	69.6 ²	1:1/0.5:1	CC 30.1 NNG 4.2 DSS/CE 0.5	0
Tier IIIB				
Non-Native Grassland (NNG)	2.7	1:1/0.5:1	NNG 1.4	0
TOTALS	150.6³	-	88.9⁴	5.5⁴

1. Includes 0.3-acre of off-site impact
2. Includes 0.2-acre of off-site impact
3. If the Montecito sub-project occurs prior to the proposed Sycamore Estates sub-project, an additional 1.5 acres of southern mixed chaparral would be impacted that would otherwise be impacted by Sycamore Estates.
4. If the Sycamore Estates sub-project mitigates for the construction of Rancho Encantada Parkway across the Montecito sub-project site, 27.2 acres of Tier IIIA shall be deleted from the on-site preservation requirements inside the MHPA. In addition, the 5.5 acres of off-site habitat acquisition requirement would be deleted.

- a. Prior to the issuance of a grading permit, a conservation easement shall be placed over the open space portions of the site and the Sycamore Estates site in the acreage amounts designated as preservation areas in the above table, as shown on Exhibit A.
- b. No more than one week prior to grading, the MHPA open space limits, as shown on Exhibit A, shall be marked in the field by the construction supervisor and the project biologist, and orange construction fencing shall be installed. These limits shall be identified on the grading plan. The project biologist shall submit a letter report to the Environmental Review Manager, verifying that construction limits have been flagged in the field. No foot traffic nor other forms of disturbance shall be allowed within the MHPA open space limits, except as otherwise permitted by the Project approvals or necessary to perform work pursuant to Project approvals as determined by the ERM. After the completion of grading, the project biologist shall submit a post-grading report to the Environmental Review Manager verifying that the amount of impacted acreage did not exceed the acreage amounts listed on the table above.
- c. Prior to the issuance of a grading permit, the applicant shall provide written verification to the Environmental Review Manager that 5.5 acres of Tier II habitat has been designated for open space preservation on the Sycamore Estates parcel. Because the off-site mitigation requirement is less than ten acres, if the Sycamore Estates site becomes unavailable for habitat preservation, the owner/permittee shall be permitted to contribute to a habitat acquisition fund, as follows: Prior to issuance of grading permits, the owner/permittee shall mitigate impacts to 5.5 acres of Tier II outside of the MHPA to the satisfaction of the ERM, through the payment of fees for off-site acquisition of 5.5 acres of habitat in the MHPA, as described below. The owner/permittee shall contribute to the City's Habitat Acquisition Fund (No. 10571) as established by City Council Resolution R-275129, adopted on February 12, 1990, for the off-site acquisition of 5.5 acres of habitat within the MHPA. The exact amount of monetary contribution will be determined by the City's Planning and Development Review Department, in consultation with the City's Real Estate Assets Department, 60 days prior to payment.

SYCAMORE ESTATES SUB-PROJECT

- 4.3-2: Mitigation for impacts to upland vegetation communities shall consist of on-site preservation in the acreage amounts presented in the table below. Upland vegetation communities shall be mitigated satisfactory to the City of San Diego's Environmental Review Manager of Land Development Review and as specified by criterion a and b, below.

SYCAMORE ESTATES SUB-PROJECT ONLY			
Habitat	Impact (outside MHPA) ¹	Mitigation Ratio (preservation area outside/inside MHPA)	On-Site Preservation Inside MHPA ²
Tier I			
Oak Woodland (OW)	0.9	2:1/1:1	OW 0.9
Native Grassland (NG)	3.5	2:1/1:1	NG 0.5 OW 3.0
Tier II			
Diegan Coastal Sage Scrub (DSS)	142.0	1.5:1/1:1	CSS 72.0 ESMC 70.0
Diegan Coastal Sage Scrub/ Chaparral Ecotone (CSS/CE)	2.7	1.5:1/1:1	CSS/CE 0.2 SMC 2.5
Tier IIIA			
Southern Mixed Chaparral (SMC)	221.9	1:1/0.5:1	SMC 111.0
Chamise Chaparral (CC)	141.7	1:1/0.5:1	CC 69.5 NNG 1.7
Tier IIIB			
Non-Native Grassland (NNG)	4.1	1:1/0.5:1	NNG 2.1
TOTALS	516.8	-	333.4

1. Includes impacts to 0.5-acre of Diegan coastal sage scrub and 0.6-acre of chamise chaparral inside the MHPA on the City of San Diego parcel caused by road improvements. The mitigation ratio is as shown on the above table (1:1) for Diegan coastal sage scrub, but is increased from 0.5:1 to 1:1 for chamise chaparral.
2. Excess mitigation totals available for other projects assuming no mitigation for off-site improvements are: SMC: 13.3 acres; NNG: 0.4-acre, and CC: 1.0 acres.

- a. If the Sycamore Estates sub-project precedes development of the adjacent Montecito sub-project and is responsible for constructing Rancho Encantada Parkway as an off-site improvement, the on-site preservation acreages shall be increased by the following amounts: SMC: 30.8 acres and CC: 1.9 acres.
- b. No more than one week prior to grading, the MHPA open space limits, as shown on Exhibit A, shall be marked in the field by the construction supervisor and the project biologist, and orange construction fencing shall be installed. These limits shall be

identified on the grading plan. The project biologist shall submit a letter report to the Environmental Review Manager, verifying that construction limits have been flagged in the field. No foot traffic nor other forms of disturbance shall be allowed within the MHPA open space limits, except as otherwise permitted by the Project approvals or necessary to perform work pursuant to Project approvals as determined by the ERM. After the completion of grading, the project biologist shall submit a post-grading report to the Environmental Review Manager verifying that the amount of impacted acreage did not exceed the acreage amounts listed on the table above.

SEWER PUMP STATION

The following mitigation measure shall be required only if the sewer pump station design option is selected for implementation. Responsibility for mitigation would be assumed by the sub-project which is granted the first grading permit in *Rancho Encantada*.

4.3-3: Mitigation for impacts to upland vegetation communities due to construction of the sewer pump station (if planned for construction) shall be the responsibility of the owner/permittee who applies for the first grading permit within *Rancho Encantada*. Mitigation shall consist of on-site preservation in the acreage amounts presented in the table below. Upland vegetation communities shall be mitigated satisfactory to the City of San Diego’s Environmental Review Manager of Land Development Review.

SEWER PUMP STATION			
Habitat	Impact (inside MHPA) ¹	Mitigation Ratio (preservation area outside/inside MHPA)	On-Site Preservation Inside MHPA
Tier II			
Diegan Coastal Sage Scrub (DSS)	0.8	2:1/1:1	eSMC 0.8
Tier IIIA			
Chamise Chaparral (CC)	0.1	1.5:1/1:1	eSMC 0.1
Tier IIIB			
Non-Native Grassland (NNG)	0.1	1.5:1/1:1	NNG 0.1
TOTALS	1.0	-	1.0

OFF-SITE GRAVITY SEWER LINE (CITY OF POWAY)

The following mitigation measure shall be required only if the off-site gravity sewer line design option is selected for implementation. Responsibility for mitigation would be assumed by the sub-project which is granted the first grading permit in *Rancho Encantada*.

- 4.3-4: Mitigation for impacts to upland vegetation communities due to construction of the off-site gravity sewer line (if selected for implementation) shall be the responsibility of the owner/ permittee who applies for the first grading permit within *Rancho Encantada*. Mitigation shall consist of creation of 0.9 acres of coast live oak woodland and preservation of 0.3 acres of other upland vegetation as listed in the acreage amounts presented in the table below. Upland vegetation communities shall be mitigated satisfactory to the City of Poway.

OFF-SITE GRAVITY SEWER LINE (CITY OF POWAY)			
Habitat	Impact	Mitigation Ratio	Mitigation Requirement
Coast Live Oak Woodland	0.3	3:1 ¹	0.9 ¹
Diegan Coastal Sage Scrub (& disturbed)	0.1	2:1	0.2
Non-Native Grassland	0.1	1:1	0.1
Developed	3.4	0	0.0
Disturbed	0.1	0	0.0
TOTALS	4.0	--	1.2

1. Requires habitat creation.

Mitigation for Wetlands

MONTECITO SUB-PROJECT

- 4.3-5: Prior to issuance of grading permits, documentation shall be submitted to the Environmental Review Manager verifying that necessary California Department of Fish and Game (CDFG) Section 7 and Army Corps of Engineers (ACOE) Section 404 permits have been obtained and the City-required wetland mitigation program has been approved. Mitigation for wetland impacts shall consist of on-site wetland habitat restoration and/or creation. Impacts to 0.01-acre of natural flood channel shall be mitigated at a 2:1 ratio, for a total of 0.02-acre. All wetland mitigation will be contingent upon state and federal resource agency approval. All impacts to wetlands must be mitigated “in-kind” and achieve “no-net-loss” of wetland function and values. The conceptual wetland mitigation plan (provided in Appendix B-1 of this EIR), prepared in compliance with the City’s Biology Guidelines, shall be initiated upon receipt of necessary state and federal agency approvals. Planting of riparian creation areas as specified in the approved wetland mitigation program shall commence in the first planting season following issuance of the first grading permit. Revegetation shall occur adjacent to existing wetland habitat and within the Montecito project boundaries. The habitat restoration plan must include a monitoring and maintenance program to ensure the success of the wetland mitigation. Monitoring shall occur for 5 years, or until 5-year success criteria (80 percent coverage) are met. Impacts to ephemeral drainages (non-vegetated waters of the U.S.) are covered under ACOE and CDFG jurisdiction and final mitigation requirements will be determined upon project review as part of the ACOE Section 404, California Regional Water

Quality Control Board Section 401, and CDFG Section 1603 permitting process. The conceptual mitigation plan contained in Appendix B-1 accounts for mitigation of impacts to ephemeral drainages.

- 4.3-6: No more than one week prior to grading, orange silt construction fences shall be installed around all construction areas within 100-feet of wetlands. Locations of silt fences locations or other sediment prevention measures shown in the Project's approved Storm Water Pollution Prevention Program (SWPPP) necessary to minimize erosion impacts to wetlands shall be noted and graphically shown on the grading plan, and as shown on the Exhibit A grading plans. The project biologist shall submit a letter report to the ERM, verifying that the silt fences and/or other sediment prevention measures have been installed in the appropriate locations. Once grading is completed, the silt fencing shall be removed.

□ **SYCAMORE ESTATES SUB-PROJECT**

- 4.3-7: Prior to issuance of grading permits, documentation shall be submitted to the Environmental Review Manager verifying that necessary California Department of Fish and Game Section 7 and Army Corps of Engineers Section 404 permits have been obtained and the City-required wetland mitigation program has been approved. Mitigation for wetland impacts shall consist of on-site wetland habitat restoration. Impacts to 0.53-acre of natural flood channel shall be mitigated at a 2:1 ratio, for a total of 1.06 acres. All wetland mitigation will be contingent upon state and federal resource agency approval. All impacts to wetlands must be mitigated "in-kind" and achieve "no-net-loss" of wetland function and values. The wetland habitat restoration plan (provided in Appendix B-2 of this EIR), prepared in compliance with the City's Biology Guidelines, shall be initiated upon receipt of necessary state and federal agency approvals. Planting of riparian creation areas as specified in the approved wetland mitigation program shall commence in the first planting season following issuance of the first grading permit. Revegetation shall occur adjacent to existing wetland habitat and within the Sycamore Estates project boundaries. The habitat restoration plan must include a monitoring and maintenance program to ensure the success of the wetland mitigation. Monitoring shall occur for 5 years, or until 5-year success criteria (80 percent coverage) are met. Impacts to ephemeral drainages (non-vegetated waters of the U.S.) are covered under ACOE and CDFG jurisdiction and mitigation requirements will be determined upon project review as part of the ACOE Section 404, California Regional Water Quality Control Board Section 401, and CDFG Section 1603 permitting process. The conceptual mitigation plan contained in Appendix B-2 accounts for mitigation of impacts to ephemeral drainages.
- 4.3-8: No more than one week prior to grading, orange construction fences shall be installed around all construction areas within 100-feet of wetlands. Locations of silt fences or other sediment prevention measures shown in the Project's approved Storm Water Pollution Prevention Program (SWPPP) necessary to minimize erosion impacts to wetlands shall be noted and graphically shown on the grading plan as shown on the Exhibit A grading plan. The project biologist shall submit a letter report to the ERM, verifying that the silt fences and/or other sediment prevention measures have been installed in the appropriate locations. Once grading is completed, the silt fencing shall be removed.

□ **SEWER PUMP STATION**

The following mitigation measure shall be required only if the sewer pump station design option is selected for implementation. Responsibility for mitigation would be assumed by the sub-project which is granted the first grading permit in *Rancho Encantada*.

- 4.3-9: Mitigation for impacts to 0.02-acre of natural flood channel due to construction of the sewer pump station (if planned for construction) shall be the responsibility of the owner/permittee who applies for the first grading permit within *Rancho Encantada*. Prior to issuance of grading permits, documentation shall be submitted to the Environmental Review Manager verifying that necessary California Department of Fish and Game Section 7 and Army Corps of Engineers Section 404 permits have been obtained and the City-approved wetland mitigation program has been initiated. Mitigation for wetland impacts shall consist of on-site wetland habitat restoration. Impacts to 0.02-acre of natural flood channel shall be mitigated at a 2:1 ratio, for a total of 0.04 acres. All wetland mitigation will be contingent upon state and federal resource agency approval. All impacts to wetlands must be mitigated “in-kind” and achieve “no-net-loss” of wetland function and values. Revegetation shall occur adjacent to existing wetland habitat and within the *Rancho Encantada* project boundaries. The habitat restoration plan must include a monitoring and maintenance program to ensure the success of the wetland mitigation. Monitoring shall occur for 5 years, or until 5-year success criteria (80 percent coverage) are met.

□ **OFF-SITE GRAVITY SEWER LINE (CITY OF POWAY)**

The following mitigation measure shall be required only if the off-site gravity sewer design option is selected for implementation. Responsibility for mitigation would be assumed by the sub-project which is granted the first grading permit in *Rancho Encantada*.

- 4.3-10: Mitigation for impacts to 0.02-acre mulefat scrub, 0.02-acre of southern willow scrub, 0.01-acre of freshwater marsh and 0.01-acre of freshwater seep due to construction of the off-site gravity sewer line (if planned for construction) shall be the responsibility of the owner/permittee who applies for the gravity sewer line construction permit from the City of Poway. Prior to issuance of construction permits by the City of Poway, documentation shall be submitted to the City of Poway verifying that necessary California Department of Fish and Game Section 7 and Army Corps of Engineers Section 404 permits have been obtained. Mitigation for wetland impacts shall consist of restoring ground surface of the sewer line alignment to its original condition prior to sewer line installation. All wetland mitigation will be contingent upon state and federal resource agency approval. All impacts to wetlands must be mitigated “in-kind” and achieve “no-net-loss” of wetland function and values. The habitat restoration plan must include a monitoring and maintenance program to ensure the success of the wetland mitigation. Monitoring shall occur for 5 years, or until 5-year success criteria (80 percent coverage) are met.

Mitigation for Sensitive Wildlife Species

The following measure applies to both the Montecito and Sycamore Estates sub-projects. Mitigation for cumulative impacts to raptor foraging habitat (Diegan coastal sage scrub and grassland habitats) is unmitigated and the following measure mitigates the potential direct impacts.

- 4.3-11: Prior to the issuance of a grading permit, a qualified biologist shall determine the presence or absence of occupied raptor nests on the sub-project site and vicinity, with written results submitted to the Environmental Review Manager (ERM) of the Land Development Review Department. Grading and construction which creates adverse effects to active raptor nests, including noise levels above 60 dB(A), shall be restricted to 300 feet from any Cooper's hawk (*Accipiter cooperii*) nesting site; 900 feet from any northern harrier (*Circus cyaneus*) nesting site; and 4,000 feet from any golden eagle (*Aquila chrysaetos*) nesting site. This restriction shall be noted on all grading and construction plans. If active raptor nests are located within the distances listed above, weekly biological monitoring of the nests shall be conducted by the project biologist during the breeding season (February 1 through August 15) with written results submitted to ERM of the Land Development Review Department. No grading or construction activities shall be permitted within those restricted areas until the young have fledged.

Mitigation for Sensitive Plant Species

SYCAMORE ESTATES SUB-PROJECT

- 4.3-12: Prior to the issuance of grading permits, the following irrigation restriction shall be noted and graphically shown on the Landscape Plans, as shown on Exhibit A. No irrigation on the proposed manufactured slopes tributary to the off-site willow monardella population shall be allowed beyond those areas necessary for brush management.
- 4.3-13: Prior to issuance of a grading permit, the following requirements shall be noted and graphically shown on the construction, grading, and landscaping plans for the Sycamore Estates sub project site and approved by the Environmental Review Manager of the Land Development Review Department. Silt fences shall be installed around all construction areas on slopes within the watershed of the willow monardella population. Silt fence locations shall be noted and graphically shown on the grading plan as shown on the Exhibit A grading plan. The project biologist shall submit a letter report to the Environmental Review Manager, verifying that the silt fences have been installed in appropriate locations. Once grading is completed, the silt fencing may be removed and other silt trapping best management practices such as straw wattles or sand bags shall be installed in its place at the base of the manufactured slope upstream of the population to minimize erosion effects.

Mitigation for Indirect Impacts**□ MONTECITO AND SYCAMORE ESTATES SUB-PROJECTS**

- 4.3-14: Prior to issuance of each building permit for those structures adjacent to MHPA, a lighting design shall be provided to the Environmental Review Manager (ERM) of the Land Development Review Department for approval. That plan shall minimize exterior lighting in development areas adjacent to the MHPA and where needed selectively placed, shielded, and directed away from native habitat. In addition, lighting from homes abutting conserved habitat shall be screened with vegetation, and large spot-light type lighting that may affect conserved habitat shall be prohibited. The lighting design shall be noted and graphically shown on construction building and landscape plans and compliance with this measure shall be monitored by the ERM of the Land Development Review Department. Restriction of spot-light type lighting adjacent to conserved habitat shall be noted in the sub-project's CC&Rs.
- 4.3-15: Prior to issuance of grading permits, a fencing plan shall be provided to the Environmental Review Manager (ERM) of the Land Development Review Department for approval. That plan shall require fencing in all areas adjacent to the MHPA to limit access to the MHPA, as shown on Exhibit A. Fencing shall not be required where slopes are sufficiently steep to preclude access. The fencing design shall be indicated on construction building and landscape plans and compliance with this measure shall be monitored by the ERM of the Land Development Review Department.
- 4.3-16: Educational materials regarding the sensitivity of the MHPA shall be given to project residents as part of the Project's CC&Rs.
- 4.3-17: Prior to issuance of grading permits, a landscape plan shall be provided to the Environmental Review Manager (ERM) of the Land Development Review Department for approval. That plan shall require that newly graded slopes adjacent to the MHPA, and existing fire breaks within the MHPA (not being used for trails) be revegetated with native species, as shown on Exhibit A. Pursuant to an approved landscape plan for this project, no invasive, non-native plant species shall be permitted on these slopes. The landscape design shall be indicated on construction building and landscape plans and compliance with this measure shall be monitored by the ERM of the Land Development Review Department.
- 4.3-18: Implementation of Mitigation Measure 4.4-2 (GEOLOGY/SOILS), Mitigation Measures 4.5-1 through 4.5-10 (HYDROLOGY/WATER QUALITY), and 4.8-1 (AIR QUALITY) shall mitigate potential indirect impacts to vegetation communities and sensitive plant species associated with erosion, exposure to urban pollutants, and dust.

Sycamore Estates Sub-Project

- 4.3-19: For the purpose of this mitigation measure, "MHPA" refers to the MHPA limits as defined at the time of Project application and shown as "Existing MHPA Line" on Exhibit A.

Based on the coastal California gnatcatcher (“gnatcatcher”) and habitat survey conducted on the project site in 1999, there is limited potential for gnatcatchers to occur within the MHPA on-site. Mitigation for indirect noise impacts to gnatcatchers during their breeding season shall only be required in MHPA areas with substantial coastal sage scrub. Therefore, this measure shall only apply to the MHPA area adjacent to Planning Area 11 and proposed access through the MHPA associated with Planning Area 11. Mitigation for indirect impacts is as follows:

- a. No clearing of gnatcatcher-occupied habitat is allowed within the MHPA during the breeding season (March 1 to August 15).
- b. If clearing or grading occurs adjacent to the MHPA during the gnatcatcher breeding season, gnatcatcher surveys shall be conducted in appropriate habitat within 500 feet of the MHPA boundary and impacts to the nesting areas avoided. If no gnatcatchers are identified within the MHPA, no additional measures will be required. If present, measures to minimize noise impacts will be required and may include temporary noise walls/berms. These noise attenuation measure shall not impact any sensitive vegetation. If a survey is not conducted and construction is proposed during the gnatcatcher breeding season, gnatcatcher presence will be assumed and a temporary noise wall/berm would be required. Noise levels from construction activities during the gnatcatcher breeding season should not exceed 60 dBA hourly LEQ at the edge of the MHPA or the ambient noise level if noise levels already exceed 60 dBA hourly LEQ. Construction noise in occupied gnatcatcher territories shall be measured after installation of noise attenuation measures and a report on noise levels provided to EAS. If necessary, additional noise attenuation will be required to ensure that gnatcatchers are not subjected to noise levels over 60 dBA.

Issue 2: *Will the project interfere with the movement of any resident or migratory fish or wildlife species?*

Significance Criteria

Implementation of the proposed project would have a significant impact if it were to interfere with the movement of any resident or migratory fish or wildlife species.

Impact Analysis

The undeveloped *Rancho Encantada* project site is located in the northeastern portion of the City of San Diego. Wildlife likely use portions of the site for movement to the open space in the east and in the south and within the corridor of Beeler Creek. The configuration of open space to be retained on the *Rancho Encantada* project site would be consistent with that anticipated in the City’s adopted MSCP Subarea Plan, and impacts to habitat corridors would be considered adverse but not significant.

Wildlife movement through Beeler Canyon would be accommodated by two options based on the proposed plan. The first option is that wildlife would move north of the existing homes along the bottom of Beeler Canyon and along the adjacent slopes to the north. The second movement option would be south of the existing homes through the 450-foot corridor along the lower southern slopes of Beeler Canyon, and then into the canyon after passing the existing homes. Wildlife would need to go around the existing Calmat Quarry operation under either scenario. The most likely scenario would be for wildlife to choose the existing northern option given the topography and cover provided. Given the width of the corridor within Poway and the addition of the open space provided by the Project, it is anticipated that this corridor would continue to function effectively as a regional wildlife corridor. Impacts would be considered adverse but not significant.

Two regional wildlife corridors are mapped by the Final MSCP, City of Poway MSCP, and City of San Diego MSCP plans (see Figure 4.3-4) on or adjacent to the project: Beeler Canyon, an east-west corridor, along the northern project boundary, and Sycamore Canyon, a north-south corridor, along the eastern MHPA boundary. The on-site portion of the MHPA on the Montecito sub-project borders Beeler Canyon and City of Poway open space, although there are approximately 10 existing homes on the south side of Beeler Canyon Road directly to the north of the site. In addition, there is an existing residence within the MHPA on the Montecito sub-project. The adjacent open space area within the City of Poway consists of natural habitats including the existing drainage within Beeler Canyon and the southern-facing slopes of Beeler Canyon. These slopes consist of part natural habitat and part revegetated natural habitat. The revegetated areas are associated with former fill activities from development along Scripps-Poway Parkway. The width of the undeveloped portion of Beeler Canyon within the City of Poway ranges from approximately 1,200 feet to 1,600 feet. The width of the corridor at the Calmat Quarry operation is approximately 1,000 feet.

The proposed MHPA boundary adjustment associated with the *Rancho Encantada* project would add at least 400 feet to the mapped Beeler Canyon Regional Wildlife Corridor width on the Sycamore Estates sub-project site, while reducing the mapped MHPA corridor width to approximately 300 feet at the narrowest between the existing and proposed homes on the Montecito sub-project site (see Figures 4.3-7 and 4.3-8). A two-lane residential street that would connect the Sycamore Estates development to Beeler Canyon Road and several utility access roads and detention basins would be located within the area proposed to be added to the MHPA on both the Montecito and Sycamore Estates sub-project sites.

It is anticipated that impacts to general wildlife movement on the *Rancho Encantada* project site and in the vicinity, as well as within the mapped Beeler Canyon and Sycamore Canyon Regional wildlife corridors, would occur due to the approximately three-mile-long, 683-acre development footprint extending eastward from Pomerado Road proposed in the *Rancho Encantada* Precise Plan.

Development of the project would force wildlife to travel around the *Rancho Encantada* development footprint. However, overall project design would maintain the integrity of the preserve design mapped in the Final MSCP, City of Poway MSCP, and City of San Diego MSCP plans, thereby assuring continued wildlife movement in the region and avoiding significant impacts. In addition, the detention basins and utility access roads would not be lit at night. As riparian plant species develop in and around the detention basins, the basins may provide some benefit to wildlife movement by offering additional vegetative cover for wildlife moving through the area.

Limited impacts to wildlife movement may occur as a result of increased human activity, pet disturbance and increased night lighting along the Beeler Canyon corridor boundary. However, the incorporation of fencing, directional and shielded lighting and proper signage into the Montecito and Sycamore Estates sub-project sites, as identified in Mitigation Measures 4.3-8 through 4.3-12 of the previous discussion, would ensure impacts to wildlife movement would be avoided.

Given the width of the corridor within Poway and use of fencing, signage, and shielded-directional lighting, provided by the Montecito sub-project, it is anticipated that this corridor would continue to function effectively as a regional wildlife corridor. Impacts would be considered adverse but not significant for the Montecito sub-project.

The Sycamore Estates sub-project would not develop homes directly adjacent to City of Poway open space along Beeler Canyon. The closest proposed home would be approximately 400 feet south of the City of Poway boundary. This would expand the mapped width of the Beeler Canyon regional wildlife corridor in this area. Limited impacts to wildlife movement may occur as a result of increased human and pet activity and increased night lighting along the corridor boundary. However, the incorporation of fencing, directional and shielded lighting and proper signage into the Sycamore Estates project, as identified in Mitigation Measures 4.3-8 through 4.3-12 of the previous discussion, would ensure impacts to wildlife movement would be avoided.

The Sycamore Canyon regional wildlife corridor occurs as the eastern edge of the MHPA portion of the site which is planned for open space. Because the Sycamore Estates sub-project would not affect this portion of the site, no significant impacts to wildlife movement along this regional corridor would be anticipated. Combined, these corridors provide significant improvements over the existing MHPA for wildlife movement.

Significance of Impacts

There would be minimal impacts to wildlife movement. Impacts would not be considered significant.

Mitigation Measures, Mitigation Monitoring and Reporting Program

Impacts would not be significant; therefore, no mitigation is required.

Issue 3: *Would the project affect the long-term conservation of biological resources?***Significance Criteria**

Implementation of the proposed project would have a significant impact if it were to substantially diminish habitat for fish, wildlife or plants. The combined effects of this and other projects in the region on biological resources are the cumulative impact.

Impact Analysis

In general, the analysis of the relationship of a project to the MSCP is an analysis of the effects of a project on long-term conservation of biological resources. This is because a primary purpose of the MSCP is to assemble an open space preserve within the MSCP study area that will contribute to long-term conservation of biological resources within southwestern San Diego County. As such, effects of individual projects on long-term conservation of biological resources must be evaluated in the context of their consistency with the Subarea Plan's policies and established MHPA boundaries. Projects proposing MHPA boundaries that differ from the MHPA boundaries shown in the adopted MSCP Subarea Plan must be determined to exhibit equal or greater biological value as compared to the MHPA boundary in the Subarea Plan. The City of San Diego's MSCP Subarea Plan allows adjustment to the MHPA if the adjustment would result in the same or higher biological functions and values for the preserve. The comparison of biological value is based on the following factors:

1. Effects on significantly conserved habitats.
2. Effects on covered species.
3. Effects on habitat linkages and function of preserve areas.
4. Effects on preserve configuration and management.
5. Effect on ecotones and other conditions affecting species diversity.
6. Effect to species of concern not on the MSCP covered species list.

Figure 4.3-6, *Montecito MHPA Boundary Adjustment* and Figure 4.3-7, *Sycamore Estates Boundary Adjustment*, depicts the MHPA boundary as presented in the adopted MSCP plan along with 1) the area included in the MHPA by the MSCP plan and proposed to be deleted from the MHPA and graded by either the Montecito sub-project or the Sycamore Estates sub-project; and 2) the area proposed to be added to the MHPA as part of the Sycamore Estates sub-project. As illustrated in Figures 4.3-6 and 4.3-7, these areas represent project-level refinements to the regional MHPA boundary. As summarized in Table 4.3-9, *MHPA Boundary Adjustment Analysis*, a 348.3-acre net increase in the size of the MHPA would occur as a result of the proposed boundary adjustment.

Boundary adjustments specific to the Montecito and Sycamore sub-projects are summarized in Table 4.3-10 and Table 4.3-11, respectively. On the Montecito sub-project, the existing MHPA area would be reduced by approximately 15.9 acres; on the Sycamore sub-project site the MHPA would be increased by approximately 364.2 acres.

**Table 4.3-9
PRECISE PLAN MHPA BOUNDARY ADJUSTMENT ANALYSIS**

Habitat	MSCP Status	Proposed to be removed from MHPA (acres)	Proposed to be added to MHPA (acres)	Net Difference (acres)
Mulefat Scrub	Sensitive	-	0.04	+0.04
Oak Woodland	Sensitive	-	3.9	+3.9
Native Grassland	Sensitive	-	0.5	+0.5
Diegan Coastal Sage Scrub (including disturbed)	Sensitive	2.4	78.6	76.2
Diegan Coastal Sage Scrub/ Chaparral Ecotone	Sensitive	-	0.2	+0.2
Chaparral (undifferentiated)	Sensitive	2.7	0.9	-1.8
Southern Mixed Chaparral	Sensitive	7.4	197.8	+190.4
Chamise Chaparral	Sensitive	22.8	76.6	+53.8
Non-native Grassland	Sensitive	-	4.4	+4.4
Disturbed Habitat	Not sensitive	0.3	18.0	+17.7
Developed	Not sensitive	-	3.0	+3.0
TOTAL		35.6	383.9	348.30

Source: HELIX Environmental Planning; September 18, 2000

**Table 4.3-10
MONTECITO SUB-PROJECT MHPA BOUNDARY ADJUSTMENT ANALYSIS**

Habitat	MSCP Status	Proposed to be removed from MHPA (acres)	Proposed to be added to MHPA (acres)	Net Difference (acres)
Mulefat Scrub	Sensitive	-	-	-
Oak Woodland	Sensitive	-	-	-
Native Grassland	Sensitive	-	-	-
Diegan Coastal Sage Scrub (including disturbed)	Sensitive	1.0	6.6	+5.6
Diegan Coastal Sage Scrub/ Chaparral Ecotone	Sensitive	-	-	-
Chaparral (undifferentiated)	Sensitive	-	-	-
Southern Mixed Chaparral	Sensitive	7.4	2.1	-5.3
Chamise Chaparral	Sensitive	22.8	6.0	-16.8
Non-native Grassland	Sensitive	-	0.3	+0.3
Disturbed Habitat	Not sensitive	-	0.3	+0.3
Developed	Not sensitive	-	-	-
TOTAL		31.2	15.3	-15.9

Source: HELIX Environmental Planning; September 18, 2000

Table 4.3-11
SYCAMORE SUB-PROJECT MHPA BOUNDARY ADJUSTMENT ANALYSIS

Habitat	MSCP Status	Proposed to be removed from MHPA (acres)	Proposed to be added to MHPA (acres)	Net Difference (acres)
Mulefat Scrub	Sensitive	-	0.04	+0.04
Oak Woodland	Sensitive	-	3.9	+3.9
Native Grassland	Sensitive	-	0.5	+0.5
Diegan Coastal Sage Scrub (including disturbed)	Sensitive	1.4	72.0	+70.6
Diegan Coastal Sage Scrub/ Chaparral Ecotone	Sensitive	-	0.2	+0.2
Chaparral (undifferentiated)	Sensitive	2.7	0.9	-1.8
Southern Mixed Chaparral	Sensitive	-	195.7	+195.7
Chamise Chaparral	Sensitive	-	70.6	+70.6
Non-native Grassland	Sensitive	-	4.1	+4.1
Disturbed Habitat	Not sensitive	0.3	17.7	+17.4
Developed	Not sensitive	-	3.0	+3.0
TOTAL		4.4	368.6	364.2

Source: HELIX Environmental Planning; September 18, 2000

The six factors listed above must be addressed in order for a boundary adjustment to be approved (City of San Diego 1998). Each of the factors is described below, followed by an analysis of the effects of the proposed boundary adjustment.

1. *Effects on significantly and sufficiently conserved habitats (i.e., the exchange maintains or improves the conservation, configuration, or status of significantly or sufficiently conserved habitats, as defined in Section 3.4.2).*

On the Montecito sub-project, the existing MHPA area would be reduced by a net total of 15.9 acres. The habitat removed consists of 1.0-acre of Diegan coastal sage scrub, 7.4 acres of southern mixed chaparral, and 22.8 acres of chamise chaparral, while the habitat added consists of 6.6 acres of Diegan coastal sage scrub, 2.1 acres of southern mixed chaparral, 6.0 acres of chamise chaparral, 0.3-acre of non-native grassland, and 0.3-acre of disturbed habitat. All of these habitats are considered sufficiently or significantly conserved under the proposed configuration of the MHPA within the context of the proposed *Rancho Encantada* Precise Plan. If the Montecito sub-project moves forward independently of the Sycamore Estates sub-project, the reduction of the MHPA area on the Montecito sub-project would decrease the conservation of these habitats on the sub-project. In addition, the reduction would affect the configuration of these habitats by decreasing the amount of ridgeline topography within this portion of the MHPA and narrowing the remaining habitats within the MHPA in this area.

On the Sycamore Estates sub-project (and the City of San Diego owned parcel), the existing MHPA area would be increased by a total of 364.2 acres. The habitat removed consists of 1.4 acres of Diegan coastal sage scrub, 2.7 acres of undifferentiated chaparral, and 0.3 acres of disturbed habitat. The undifferentiated chaparral is made up of southern mixed chaparral and

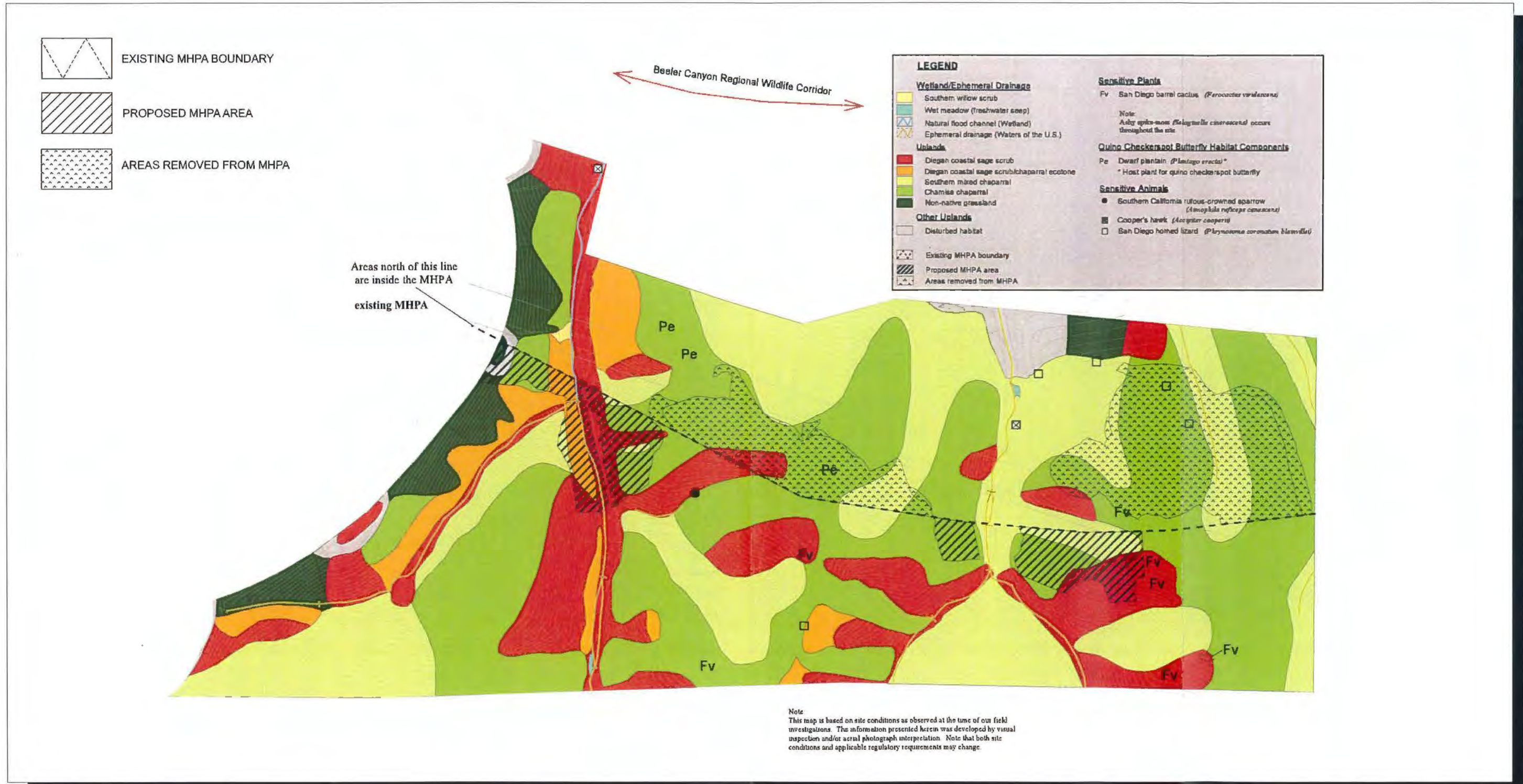
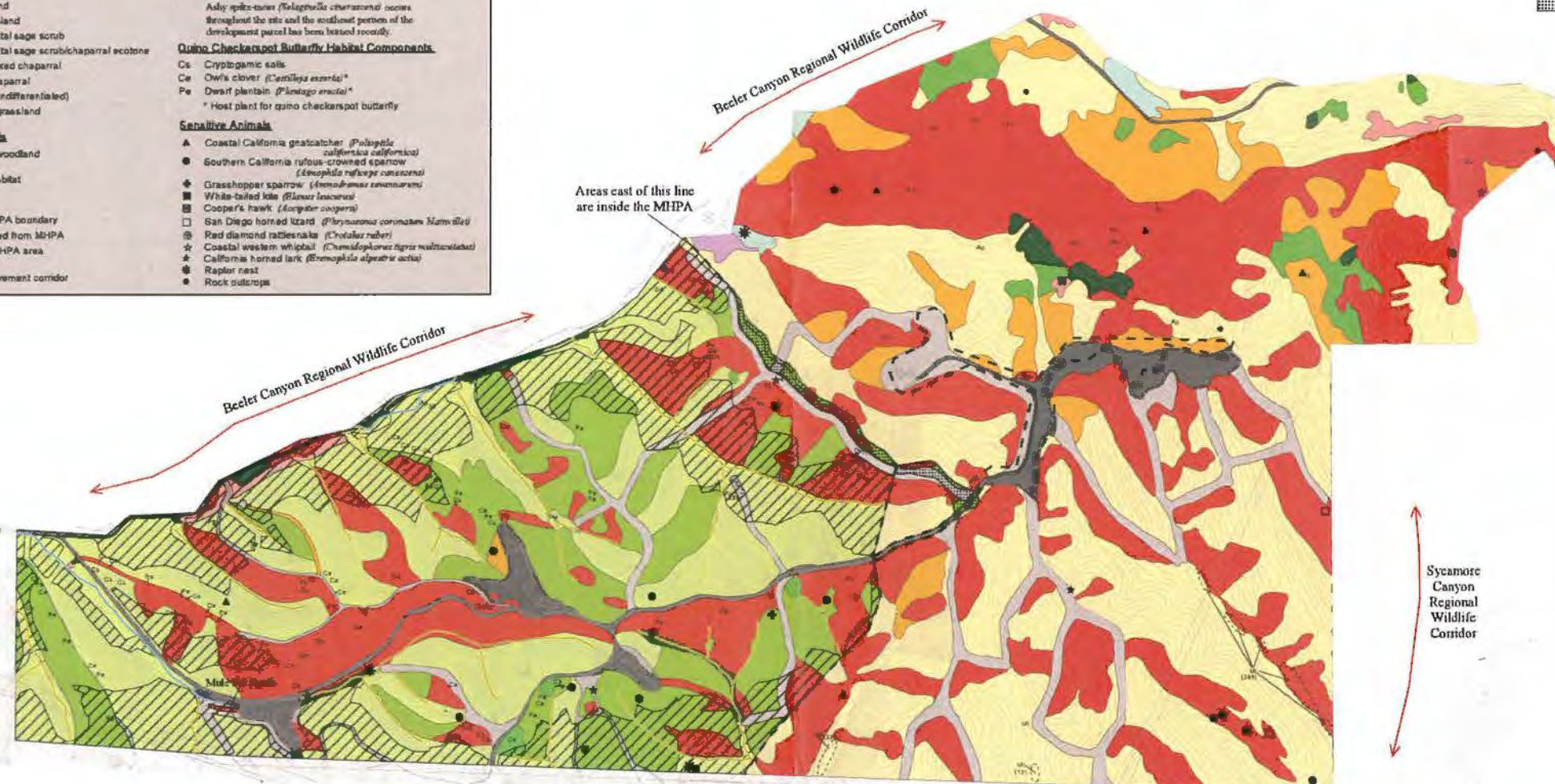


Figure 4.3-7
 MONTECITO
 MHPA BOUNDARY ADJUSTMENT

LEGEND	
Wetland/Ephemeral Drainage	
	Mule fat scrub
	Riparian scrub
	Natural flood channel (Wetland)
	Ephemeral drainage (Waters of the U.S.)
Uplands	
	Oak woodland
	Native grassland
	Diegen coastal sage scrub
	Diegen coastal sage scrub/haparral ecotone
	Southern mixed chaparral
	Chamise chaparral
	Chaparral (undifferentiated)
	Non-native grassland
Other Uplands	
	Eucalyptus woodland
	Road pool
	Disturbed habitat
	Developed
	Existing MHPA boundary
	Area removed from MHPA
	Proposed MHPA area
	Wildlife movement corridor
Sensitive Plants	
Mf	Willow monardella (<i>Monardella linoidea</i> ssp. <i>viridis</i>)
Dv	Variagated dudleya (<i>Dudleya variagata</i>)
Ms	San Diego golden star (<i>Stella divaricata</i>)
Gd	Mission Canyon blue cup (<i>Eriogonum diffusum</i> ssp. <i>filicoides</i>)
Fv	San Diego barrel cactus (<i>Pereskia viridescens</i>)
Ag	San Diego sagewort (<i>Artemisia pulchra</i>)
Oc	California adder's tongue fern (<i>Ophiodermis californicum</i>)
Note: Asky spitz-tail (<i>Polypodium chrysocarpum</i>) occurs throughout the site and the southeast portion of the development parcel has been located recently.	
Quino Checkerspot Butterfly Habitat Components	
Cs	Cryptogamic soils
Ce	Chick clover (<i>Castilleja exserta</i> *)
Pe	Dwarf plantain (<i>Plantago erecta</i> *)
* Host plant for quino checkerspot butterfly	
Sensitive Animals	
▲	Coastal California gnatcatcher (<i>Polioptila californica californica</i>)
●	Southern California rufous-crowned sparrow (<i>Amphispiza ruficeps rufescens</i>)
◆	Grasshopper sparrow (<i>Amphispiza nevadensis</i>)
■	White-tailed kite (<i>Elaenia leucurus</i>)
□	Cooper's hawk (<i>Accipiter cooperii</i>)
○	San Diego horned lizard (<i>Phrynosoma coronatum</i> <i>formosus</i>)
☆	Red diamond rattlesnake (<i>Crotalus ruber</i>)
★	Coastal western whiptail (<i>Chamaelaphorus tigris multicaudatus</i>)
✪	California horned lark (<i>Eremophila alpestris actia</i>)
⦿	Raptor nest
●	Rock outcrop

	EXISTING MHPA BOUNDARY
	PROPOSED MHPA AREA
	AREAS REMOVED FROM MHPA



SOURCE: HELIX ENVIRONMENTAL PLANNING

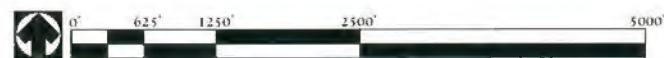


Figure 4.3-8
SYCAMORE ESTATES
MHPA BOUNDARY ADJUSTMENT

chamise chaparral. The Diegan coastal sage scrub, chamise chaparral and southern mixed chaparral are considered sufficiently or significantly conserved habitats. These habitats occur in a long linear strip adjacent to a large MHPA area to the east, which would not significantly affect the conservation or topography of these habitats. The MHPA addition on the Sycamore Estates sub-project site includes 0.04-acre of mulefat scrub, 3.9 acres of oak woodland, 0.5-acre of native grassland, 72.0 acres of Diegan coastal sage scrub (including disturbed Diegan coastal sage scrub), 0.2-acre of Diegan coastal sage scrub/chaparral ecotone, 0.9-acre of chaparral (undifferentiated), 195.7 acres of southern mixed chaparral, 70.6 acres of chamise chaparral, 4.1 acres of non-native grassland, 17.7 acres of disturbed habitat, and 3.0 acres of developed areas. The configuration of these habitats includes ridgeline topography, valleys, and slopes which abut the large existing MHPA area to the east. The inclusion of this area in the MHPA increases all significantly or sufficiently conserved habitats affected by the MHPA boundary adjustment, as well as native grassland (Tier I habitat), southern mixed chaparral and chamise chaparral.

If the Montecito sub-project is included in the Sycamore Estates project boundary adjustment, the MHPA habitats would be adjusted as noted in Table 4.3-7. All of the habitats are considered sufficiently or significantly conserved habitats if both sub-projects are combined. Additionally, MHPA additions include a variety of topographic features into open space. The inclusion of the areas in the MHPA if both sub-projects increase all significantly or sufficiently conserved habitats by the MHPA boundary adjustment.

The overall Precise Plan net change in acreages (a gain of 348.3 acres) includes a gain of 0.04 acre of mulefat scrub, 3.9 acres of oak woodland, 0.5-acre of native grassland, 76.2 acres of Diegan coastal sage scrub (including disturbed Diegan coastal sage scrub), 0.2-acre of Diegan coastal sage scrub/chaparral ecotone, 190.4 acres of southern mixed chaparral, 53.8 acres of chamise chaparral, 4.4 acres of non-native grassland, and 17.7 acres of disturbed habitat and a loss of 1.8 acres of undifferentiated chaparral. The loss in acreage of undifferentiated chaparral consists of a mix of chamise chaparral and southern mixed chaparral that was not categorized during previous vegetation mapping. Under the City's MSCP Subarea Plan (City of San Diego 1997) native grassland and oak woodland are Tier I habitat types, Diegan coastal sage scrub and Diegan coastal sage scrub/chaparral ecotone are Tier II habitat types, and chaparral and non-native grassland are Tier III habitat types.

2. *Effects to covered species (i.e., the exchange maintains or increases the conservation of covered species).*

On the Montecito sub-project, the area removed from the MHPA has not been found to contain any listed or covered species, with the exception of the San Diego horned lizard and the San Diego barrel cactus, which are covered species under the MHPA. These species are considered to be of relatively low sensitivity, and occur in other MHPA areas of the site.

On the Sycamore Estates sub-project and City of San Diego owned parcel, the area removed from the MHPA does not contain any covered species. Pursuant to Mitigation Measure 4.3-13, this area will be surveyed for the coastal California gnatcatcher, during the gnatcatcher breeding season and prior to issuance of grading permits, to determine if this species occurs in or

adjacent to the area. The area being added to the MHPA contains a portion of the watershed of a population of the federal and state listed as endangered willowy monardella, a raptor nest, and an additional 7.4 acres of Diegan coastal sage scrub over that which is being removed from the boundary adjustment on the Montecito and Sycamore Estates sub-project sites. The following low level sensitive plants and animals will also be added to the MHPA: San Diego goldenstar, variegated dudleya, Mission Canyon bluecup, San Diego barrel cactus, San Diego sagewort, southern California rufous-crowned sparrow, white-tailed kite, and red diamond rattlesnake.

The overall exchange for the Precise Plan as a whole would add an additional 348.3 acres to the MHPA, including 76.2 acres of Diegan coastal sage scrub (including disturbed Diegan coastal sage scrub). Diegan coastal sage scrub is a habitat type that may be utilized by the federally listed as threatened and MSCP-covered California gnatcatcher. In addition, an existing raptor nest is in this area and several of the slopes which would be added drain into a canyon which contains the federal and state listed as endangered willowy monardella. The habitat being removed consists largely of chaparral. No endangered or covered species were found in this area, with the exception of the San Diego horned lizard and the San Diego barrel cactus, which are covered species under the MHPA.

3. *Effects on habitat linkages and function of preserve areas (i.e., the exchange maintains or improves a habitat linkage or wildlife corridor).*

On the Montecito sub-project site, the area currently within the MHPA that is being exchanged for development consists of approximately 22.8 acres of chamise chaparral, 7.4 acres of southern mixed chaparral and 1.0 acre of Diegan coastal sage scrub. The topography of the area being removed from the MHPA includes several hundred feet of ridgeline and adjacent steep slopes. This portion of the MHPA forms the southern slope of Beeler Canyon and abuts City of Poway lands. Beeler Canyon is identified as one of two regional wildlife corridors within the City of Poway (Ogden 1996) and connects undeveloped habitats in the east, forming one of the few remaining east-west wildlife corridors in central San Diego County. The on-site portion of the MHPA in this area borders City of Poway open space, although there are approximately 10 existing homes along Beeler Canyon Road directly to the north of the site. In addition, there are two existing homes within the MHPA in this area. The adjacent open space area within the City of Poway consists of natural habitats including the existing drainage within Beeler Canyon and the southern-facing slopes of Beeler Canyon. These slopes consist of part natural habitat and part revegetated natural habitat. The revegetated areas are associated with former fill activities from development along Scripps-Poway Parkway. The width of the undeveloped portion of Beeler Canyon within the City of Poway ranges from approximately 1,200 feet to 1,000 feet. The current total width of the corridor north of Planning Area 3 on the Montecito sub-project site is 1,950 feet to 3,100 feet, excluding the homes between the site and the City of Poway. The width of the area of the MHPA being encroached ranges up to approximately 750 feet. The remaining habitat in the narrowest portion of this area (approximately 200 feet wide and 500 feet long) is fenced and consists of non-native grassland and disturbed habitats including an existing home, which would provide low amounts of vegetative cover, and may not be very conducive to wildlife movement or refuge. Other areas of the MHPA remaining after boundary adjustment in this area are relatively undisturbed with

the exception of an existing home and an existing San Diego Gas and Electric easement. This change in corridor width is not considered a significant impact.

On the Sycamore Estates sub-project site, the proposed adjustment to the MHPA would result in the loss of 1.4 acres of Diegan coastal sage scrub, 2.7 acres of undifferentiated chaparral, and 0.3-acre of disturbed habitat. This adjustment is a relatively long, linear area adjacent to the currently existing disturbed ridgeline. Proposed development in this area has been moved to the east to avoid direct impacts to a population of variegated dudleya on the southwest-facing slope to the immediate west. The area to be lost is a relatively small portion of the existing MHPA, and the loss is not expected to significantly effect wildlife movement.

In Sycamore Estates, the proposed adjustment to the MHPA results in the addition of 0.04-acre of mulefat scrub, 3.9 acres of oak woodland, 0.5-acre of native grassland, 72.0 acres of Diegan coastal sage scrub (including disturbed Diegan coastal sage scrub), 0.2-acre of Diegan coastal sage scrub/chaparral ecotone, 0.9-acre of undifferentiated chaparral, 195.7 acres of southern mixed chaparral, 70.6 acres of chamise chaparral, 4.1 acres of non-native grassland, 17.7 acres of disturbed habitat, and 3.0 acres of developed areas. The topography in this area consists of steep slopes, several hundred feet of ridgeline and small portions of valleys. The area is adjacent to large areas of natural habitat within the MHPA to the east and the MCAS to the south. The added area to the MHPA would be beneficial in expanding an already large contiguous tract of open space and includes a diversity of habitat types.

If the Montecito sub-project is included in the Sycamore Estates project boundary adjustment, the topography of the area being removed from the MHPA includes several hundred feet of ridgeline and adjacent steep slopes. This portion of the MHPA forms the southern slope of Beeler Canyon and abuts City of Poway lands. Wildlife movement through Beeler Canyon will be accommodated by two options based on the proposed plan. The first option is that wildlife will move north of the existing homes along the bottom of Beeler Canyon and along the adjacent slopes to the north. The second movement option would be south of the existing homes through the 450-foot corridor along the lower southern slopes of Beeler Canyon, and then into the canyon after passing the existing homes. Wildlife would need to go around the existing Calmat Quarry operation under either scenario. The most likely scenario will be for wildlife to choose the existing northern option given the topography and cover provided. Additionally, the increase in the corridor width on the Sycamore Estates project will benefit wildlife movement in the region.

4. *Effects on preserve configuration and management (i.e., the exchange results in similar or improved management efficiency and/or protection for biological resources).*

On the Montecito sub-project, the boundary adjustment would decrease the currently existing MHPA area. On the Sycamore Estates sub-project, the boundary adjustment would add to an already large existing MHPA area. Approximately 78 percent of the existing MHPA/development boundary will on Sycamore Estates would be pulled back from the existing boundary. In addition, a portion of the watershed of a population of endangered willow monardella would be added to the MHPA.

The MHPA boundary adjustment would result in an increase in potential edge effects on the Montecito sub-project site because the MHPA line would change from a straight line to an undulating edge that follows the topographic features of the property. This would be an increase from 4,850 linear feet to 9,200 linear feet (90 percent increase). These edge effects are minimized by the placement of the development at the tops of ridgelines, and by minimization measures described in the mitigation section of this document.

On the Sycamore Estates sub-project site, there would be an increase of edge perimeter because of the increase in the size of the MHPA. This would be an increase from 28,000 linear feet to 33,500 linear feet (20 percent increase). This increase is more than offset by the benefits of adding 364.2 acres in viable open space areas based on City of San Diego Biology Guidelines (1999), which require that habitat areas must be at least 400 feet wide for greater than a 500-foot distance and connected to viable open space to be considered open space.

If the Montecito project is included in the Sycamore Estates project boundary adjustment, the combination of the two projects' preserve configuration and management would still be a significant improvement over the existing MHPA because there would be a net increase of 348 acres into the MHPA. Additionally, 74 percent of the MHPA/development boundary would be pulled back from the existing boundary, 20 percent would be at essentially the same location, and only approximately 7 percent of the boundary would be moved into the existing MHPA. There would be an increase of edge perimeter because the increase in the size of the MHPA. This would be an increase from 32,850 linear feet to 42,700 linear feet (30 percent increase).

5. *Effects on ecotones or other conditions affecting species diversity (i.e., the exchange maintains topographic and structural diversity and habitat interfaces of the preserve).*

On the Montecito sub-project site, the habitat currently within the MHPA would be reduced by 31.2 acres. Topographical diversity would be decreased by the removal of portions of the habitat along ridgelines within the MHPA.

On the Sycamore Estates sub-project site, a greater diversity of habitat types would be added to the MHPA from that which is being removed. In terms of topographical diversity, the area being removed (4.4 acres) consists of a portion of ridgeline and adjacent slope. The area being added (368.6 acres) contains ridgelines, steep slopes and valleys.

If the Montecito sub-project is included in the Sycamore Estates sub-project boundary adjustment there would still be overall habitat and topographic diversity than without the boundary adjustment.

The overall Precise Plan boundary adjustment results in areas being added to the MHPA that have a greater diversity of habitats than the areas being removed. Both areas added and removed include several hundred feet of ridgelines and steep slopes. The area being added also includes small portions of valleys.

6. *Effects to species of concern not on the covered species list (i.e., the exchange does not significantly increase the likelihood that an uncovered species will meet the criteria for listing under either the federal or state ESAs).*

The proposed boundary adjustment is not expected to increase the likelihood that an uncovered species will be significantly impacted to meet the criteria for listing under federal or state ESAs. On both the Montecito and Sycamore Estates sub-projects, the only species of concern in the boundary adjustment areas that are not covered under the MSCP are ashy spike-moss, Mission Canyon bluecup, San Diego sagewort, and red diamond rattlesnake. Ashy spike-moss species occurs throughout the site, including areas of boundary removal and addition, and has a low level of sensitivity under reviews provided by the California Native Plant Society (Skinner and Pavlik 1994). This is also the case for any inclusion of the Montecito sub-project. The Mission Canyon bluecup, San Diego sagewort, and red diamond rattlesnake are in boundary addition areas.

Significance of Impacts

A 348.3-acre net increase in the size of the MHPA would occur as a result of the proposed MHPA boundary adjustment. Impacts of the *Rancho Encantada* Precise Plan and the Sycamore Estates sub-project would not be regarded as significant. If the Montecito sub-project developed independent of the Sycamore Estates sub-project, the MHPA would be reduced by 15.9 acres, resulting in a significant impact.

Mitigation Measures, Mitigation Monitoring and Reporting Program

☐ MONTECITO SUB-PROJECT

If the Montecito sub-project develops independent of the Sycamore Estates sub-project, the following mitigation measure would be required to reduce impacts to long-term conservation of biological resources to below a level of significance:

- 4.3-20: Prior to the issuance of the first grading permit, the owner/permittee shall assure the acquisition of 15.9 acres to be added to the MHPA, satisfactory to the ERM. The acquisition site (or sites) shall be proposed for inclusion in the MHPA and provide equal or similar functional equivalency to the area being lost on the Montecito sub-project site. The following criteria shall be employed in the investigation and selection of acquisition sites. (See Section 4.1, LAND USE, for an analysis of Project consistency with the City's MHPA Land Use Adjacency Guidelines.)
- a. Acquisition sites shall be located within the MHPA (with a minimum 15.9-acre development footprint potential per MSCP guidelines) or shall be proposed for inclusion in the MHPA;
 - b. Acquisition sites shall be potentially developable under the requirements of the OR-1 and OR-2 Zones, and development rights shall be obtained as part of the acquisition

such that the acquired land within the MHPA will no longer be available for development;

- c. Acquisition sites shall replace habitat acreage eliminated from the MHPA in-Tier or, if in-Tier replacement is not provided, acquisition sites shall contribute positively to preserve functions and values by (a) providing for increased functionality with respect to wildlife movement, habitat linkages, connectivity; (b) providing for increased functionality by eliminating a potential development area in the preserve, thereby minimizing edge effects, fragmentation and management requirements; and (c) providing for conservation of species of concern not on the MSCP covered species list.
- d. Acquisition sites shall meet the requirements of boundary adjustment equivalency analysis (Section 5.4.2, City of San Diego MSCP Plan, August 1998) and shall be approved by the USFWS and the CDFG.

4.4 GEOLOGY/SOILS

The following discussion is based on a report entitled *Geotechnical Investigation, Montecito Project, San Diego, California*, prepared by GEOCON, INC. (September 1999) and a second report entitled *Soil and Geologic Reconnaissance, Sycamore Canyon Property, San Diego, California*, also prepared by GEOCON, INC. (June 1999). The complete geotechnical reports are included as Appendices C1 and C2 to this EIR. The scope of the geotechnical investigations consisted of a review of aerial photographs, readily available published and unpublished geologic literature and a previous reconnaissance report for the sites, as well as field investigations, laboratory testing to identify physical soil properties, and an engineering analysis.

4.4.1 EXISTING CONDITIONS

A description of geologic and soil conditions and geologic hazards within the Precise Plan area is presented below and are similar for the sub-project sites. Where conditions differ between the sub-projects, site-specific information is noted in the text.

□ **GEOLOGIC & SOIL CONDITIONS OF THE PRECISE PLAN AREA**

Recent uplift and erosion in the San Diego region has produced the characteristic canyon and ridgeline topography of the subject site. The property is characterized by several north-south trending ridges that are separated by canyons and ravines. Beeler Canyon abuts the project site to the north, and the northern portion of the site drains toward Beeler Canyon. The southern portion of the site drains to Sycamore Canyon, located south of the property. Elevations vary from approximately 1,177 feet above mean sea level (AMSL) in the southeast portion of the Sycamore Estates sub-project site to approximately 600 feet AMSL in the northwest portion of the Montecito sub-project site.

Three geologic formations and nine surficial units were observed and mapped on-site by GEOCON. The geological formations consist of the Eocene-aged Stadium Conglomerate, Pomerado Conglomerate and Cretaceous-age igneous granitic rock of the Southern California Batholith. The surficial materials consist of undocumented fill, compacted fill, previously placed fill, topsoil, alluvium, debris flow materials, landslide debris, stream terrace deposits and colluvium. Other studies have mapped the Friars Formation on the northwest corner of the Montecito sub-project site; however, the Friars Formation was not found in the site reconnaissance, or encountered in the investigation conducted by GEOCON. Each of the geological formations and surficial units located on the project site are discussed below. Their estimated aerial extent (as determined by field mapping) is shown in Figure 4.4-1, *Geologic Map*.

Stadium Conglomerate (Tst)

Formational material of Eocene-age Stadium Conglomerate was observed on the canyon ridges and native slopes of the Precise Plan area. This formation typically consists of a dense to very dense, partially to well cemented, sandy coarse gravel conglomerate. When excavated, this

material disintegrates to coarse cobbly gravel with a clay or silt sand matrix. This formation typically exhibits high shear strength, low compressibility and adequate bearing capacity in either a natural or properly compacted condition. Localized zones of highly cemented material were encountered at depths of 42 feet and 54 feet, with thicknesses of two feet and one foot, respectively on the Montecito sub-project site. These cemented layers are typically discontinuous, but may require a heavier-than-normal ripping effort during grading operations. In Sycamore Estates, the Stadium Conglomerate formation appears to exceed 250 feet in thickness and is very dense with partially to well cemented cobble conglomerate observed to overlie hardrock units. The stadium conglomerate is considered suitable for direct support of planned improvements and/or additional fill. Bedding attitudes observed within the Stadium Conglomerate were horizontal, or only a few degrees from horizontal.

Pomerado Conglomerate (Tp)

Pomerado Conglomerate underlies a portion of the Sycamore Estates sub-project site. This formation exceeds 150 feet in thickness and primarily occurs above approximately 900 feet AMSL in elevation. The estimated contact between the Pomerado and Stadium Conglomerate is based upon information contained in Bulletin 200 by the California Division of Mines and Geology. The Pomerado Conglomerate is late Eocene in age and is a massive cobble conglomerate lithologically similar with the Stadium Conglomerate. Occasional thin beds and lenses of sandstone typically occur within the Pomerado Conglomerate. The Pomerado Conglomerate has a lower degree of cementation than the Stadium Conglomerate but still contains isolated zones of highly cemented conglomerate. Excavation within the Pomerado Conglomerate typically requires a heavy effort. The soils of this unit typically possess low expansive characteristics, adequate bearing and shear strength parameters in either a properly compacted or a natural condition. Slopes constructed of these materials are usually stable at 2:1 inclinations.

Granitic Rock (Kgr)

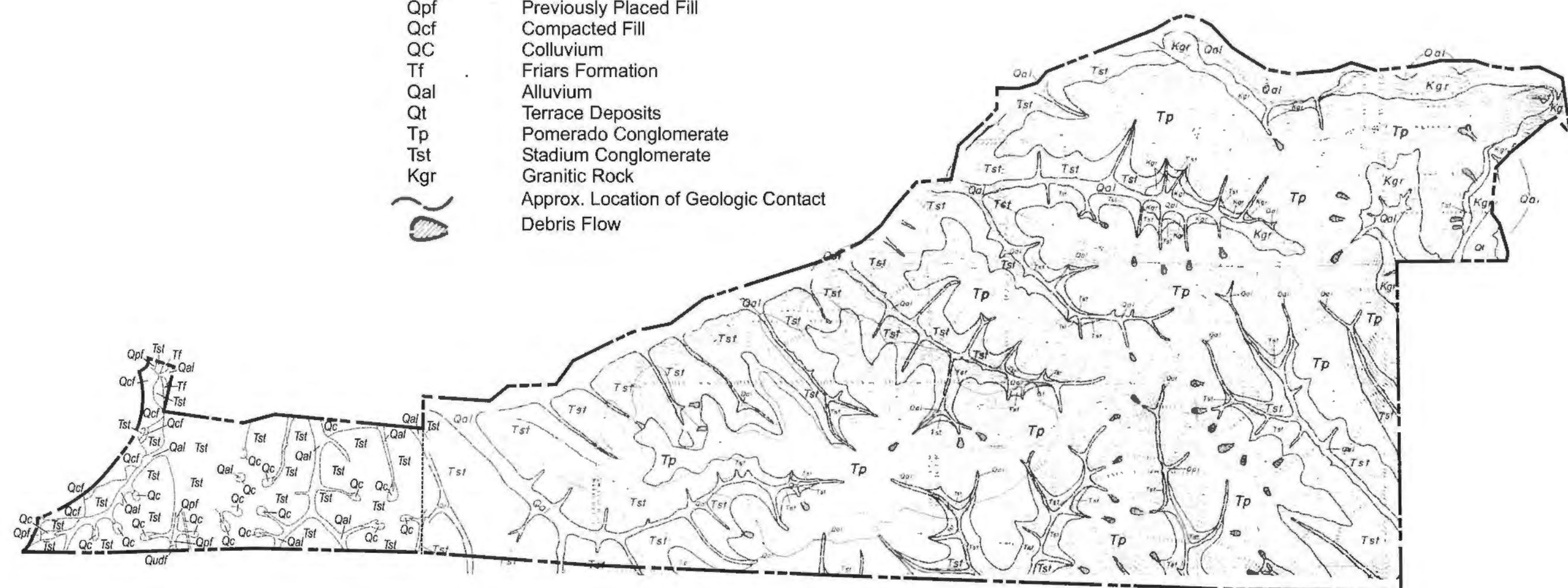
Deeply weathered granitic rocks underlie limited areas within the east-central portion of the Sycamore Estates sub-project site. The granitic rock is primarily composed of granodiorite and aplite. As observed in exposed rock outcrops, the granodiorite is highly altered resulting in development of a sandy matrix which incorporates large boulders of fresh rock. At greater depths the granitic rock is likely to become more massive and require blasting to efficiently excavate. In general, soils excavated from the weathered portions should consist of well graded silty sands (decomposed granite). It is estimated that granitic rock is exposed on approximately 5 percent of the Sycamore Estates property.

Undocumented Fill (Oudf)

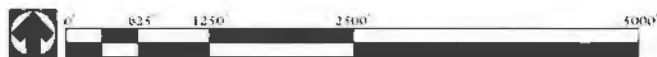
A minor amount of undocumented fill was observed within the main drainage at the south end of the Montecito site, and within unimproved dirt roads that provide access to the property.

LEGEND

- Qudf Undocumented Fill
- Qpf Previously Placed Fill
- Qcf Compacted Fill
- Qc Colluvium
- Tf Friars Formation
- Qal Alluvium
- Qt Terrace Deposits
- Tp Pomerado Conglomerate
- Tst Stadium Conglomerate
- Kgr Granitic Rock
-  Approx. Location of Geologic Contact
-  Debris Flow



SOURCE: GEOCON



RANCHO ENCANTADA EIR

**Figure 4.4-1
GEOLOGIC MAP**

The undocumented fill is considered unsuitable to support structural improvements and would require removal and re-compaction in areas of proposed site development.

Previously Placed Fill (Opf)

Previously placed fill was encountered within the north-south utility easement that traverses the western portion of the Montecito sub-project site and at various locations along the western property margin. The fill is likely associated with placement of the existing SDG&E utility line that crosses the project site, as well as remnants of the old Highway 395 alignment and unimproved dirt roads and embankments constructed for site access or drainage control. The estimated lateral extent of the fill is plotted on Figure 4.4-1. Up to five feet of fill associated with soils from the utility easements was encountered in the southern portion of Montecito sub-project site. These fills are considered unsuitable and will require removal and re-compaction within areas to support additional fill and/or structural improvements.

Compacted Fill (Qcf)

Compacted fill placed during the construction of Pomerado Road was observed in the slopes along the western Montecito property margin. The compacted fill was placed under the observation of GEOCON during the period of June 1989 and January 1990 as part of the construction of Pomerado Road that was associated with the adjacent Scripps Eastview development. Compaction test results and professional opinions regarding the fill placement are summarized in GEOCON's report entitled *Final Report of Testing and Observation Services During Mass Grading Operations, Scripps Eastview: Pomerado Road Station 37+30 to 77+00, W.O. 88-0060, San Diego, California* dated February 27, 1990 (Project No. D-3965-203). According to the referenced report, fill materials consisted of a silt to clay sand with varying amounts of gravel and cobble and sandy silt and clay. The fill soils were compacted to at least 90 percent relative compaction. The compacted fill is considered suitable for support of settlement sensitive structures or additional fill.

Topsoil (unmapped)

Topsoil ranging from approximately one foot to four feet in thickness generally blankets the native surficial and formational deposits of the Precise Plan area. The topsoils are typically loose and dry and consist of gravelly sand to sandy gravel with varying amounts of clay. Within the lower elevation areas and gentler slopes, topsoil may be up to eight feet thick and contain more clayey soils. The topsoils have a medium to high expansion potential, are considered compressible and would be unsuitable for support of structural improvements. Removal and re-compaction of the topsoils would be necessary in planned development areas.

Alluvium (Qal)

Alluvial deposits ranging in thickness from four to 15 feet were encountered within canyon drainages of the Montecito sub-project site, and deeper alluvium could be present within the

tributaries of Beeler and Sycamore Canyons. The thickness of the deposits generally increases with the size of the canyon drainage. The alluvium consists of loose gravelly sands, silts and stiff gravelly clays. The alluvium is considered compressible and unsuitable for support of structural fill and/or settlement-sensitive structures, and would require removal and re-compaction during site development.

Debris Flows

Debris flows were observed exclusively within the Pomerado Conglomerate at the origin of some of the tributary ravines in Sycamore Estates. The debris flows initiated near the crest of very steep ridges and probably occur as a result of high-intensity rainfalls. A debris flow is a rapid downslope movement of saturated surficial deposits and near surface weathered formational soils. As the soils become saturated and pore water pressures increase, the soils lose strength and fail relatively rapidly. The relatively thin topsoil thickness suggests that the debris flows are limited in extent. Within areas of planned development, complete removal and compaction of debris flows materials would be required.

Colluvium (Oc)

Colluvial deposits ranging in thickness from three to 11 feet were encountered at the heads of the tributary canyons and along the lower flanks of the canyon hillsides on the Montecito sub-project site. Colluvial materials encountered consist of gravelly clay to sandy coarse gravel, with varying amounts of silt. The thickest colluvium was encountered, being five, 10 and 11 feet thick, respectively, in the southeast and southwest portion of the property. Erosional scarps around the upper heads of several tributary canyons are indicative of shallow debris-flow accumulations that may be indistinguishable from colluvial deposits.

Terrace Deposits (Ot)

Terrace deposits were found on the Sycamore Estates sub-project site. They consist of a relatively deep accumulation of cobbles and sand occur on a hillside adjacent to the eastern most property line.

Landslide Debris (Ols)

One landslide was mapped off-site and east of the Sycamore Estates sub-project site in conjunction with a previous geotechnical investigation. The landslide is situated off-site and appears to have originally moved easterly. Because the landslide is off-site, no geotechnical constraints with respect to the use of the property exists pertaining to the landslide.

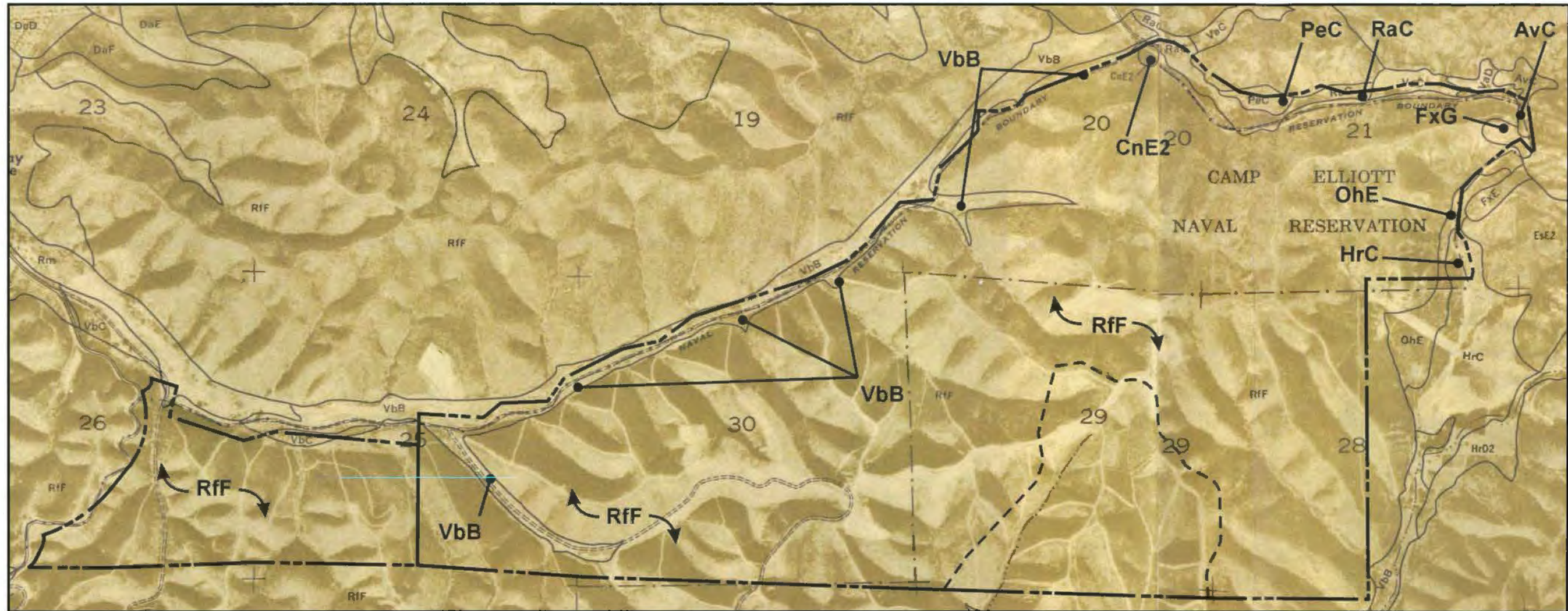
□ SOILS

According to the United States Department of Agriculture Soil Survey, San Diego Area, California, one soil type covers the Montecito sub-project site: Redding Cobbly Loam (15 to 50% slopes). For the Sycamore Estates portion, eight different soil types cover this area: Redding Cobbly Loam (15-50% slopes), Olivenhain Cobbly Loam (9 to 30% slopes), Visalia Gravelly Sandy Loam (2 to 5%), Huerhuero Loam (2 to 9% slopes), Cieneba-Fallbrook Rocky Sandy Loams (9 to 30% slopes), Ramona Sandy Loam (5 to 9% slopes), Friant Rocky Fine Sandy Loam (30 to 70% slopes), and Placentia Sandy Loam (2 to 9% slopes). The location of these soils within the project site is shown in Figure 4.4-2, *Soils Map*. Table 4.4-1, *Soil Types*, summarizes the soil types found on the *Rancho Encantada* site and their erosion susceptibility and runoff potential. The principal on-site soil type, Redding Cobbly Loam, contains a clayey subsoil and is assessed a high potential for expansion.

**Table 4.4-1
SOIL TYPES**

SUB-PROJECT	MAP SYMBOL	ESTIMATED PERCENTAGE OF PROPERTY	RUNOFF POTENTIAL	EROSION SUSCEPTIBILITY
MONTECITO	RFF	100%	Medium to Rapid	Moderate to High
SYCAMORE ESTATES	RFF	79%	Medium to Rapid	Moderate to High
	OHE	6%	Medium to Rapid	Moderate to High
	VBB	5%	Slow	Slight
	HRC	3%	Slow to Medium	Slight to Moderate
	CNE2	2%	High to Very High	Rapid to Very Rapid
	RAC	1%	Slight to Moderate	Slow to Medium
	FXG	2%	High to Very High	Rapid to Very Rapid
	PEC	2%	Slight to Moderate	Slow to Medium
CITY OF SAN DIEGO	RFF	100%	Medium to Rapid	Moderate to High
RFF	Redding Cobbly Loam, 15 to 50% slopes			
OHE	Olivenhain Cobbly Loam, 9 to 30% slopes			
VBB	Visalia Gravelly Sandy Loam, 2 to 5% slopes			
HRC	Huerhuero Loam, 2 to 9% slopes			
CNE2	Cieneba-Fallbrook Rocky Sandy Loams, 9 to 30% slopes, Eroded			
RAC	Ramona Sandy Loam, 5 to 9% slopes			
FXG	Friant Rocky Fine Sandy Loam, 30 to 70% slopes			
PEC	Placentia Sandy Loam, 2 to 9% slopes			

Source: U.S. Department of Agriculture Soil Survey, San Diego Area, California, December 1973



- RfF Redding cobbly loam, dissected 15 to 50 percent slopes
- OhE Olivenhain cobbly loam, 9 to 30 percent slopes
- VbB Visalia gravelly sandy loam, 2 to 5 percent slopes
- HrC Huerhuero loam, 2 to 9 percent slopes
- CnE2 Cieneba-Fallbrook rocky sandy loams, 9 to 30 percent slopes, eroded
- RaC Ramona sandy loam, 5 to 9 percent slopes
- FxG Friant rocky fine sandy loam, 30 to 70 percent slopes
- PeC Placentia sandy loam, 2 to 9 percent slopes
- AvC Arlington coarse sandy loam, 2 to 9 percent slope

SOURCE: U.S. DEPARTMENT OF AGRICULTURE SOIL SURVEY, 1973

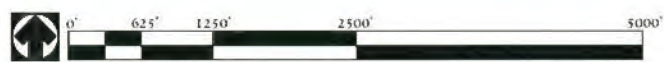


Figure 4.4-2
SOILS MAP

□ **GEOLOGIC & SOIL CONDITIONS OF THE OFF-SITE GRAVITY SEWER ALIGNMENT**

As a design option of the proposed Project, a gravity sewer line is proposed through the City of Poway, from the project site's northwestern boundary to the intersection of Pomerado Road and Old Knoll Road. According to the City of Poway's General Plan Geologic Formations exhibit, the off-site gravity sewer alignment is underlain by Pomerado Conglomerate and alluvium. Pomerado Conglomerate is a massive cobble conglomerate which is lithologically identical to Stadium Conglomerate. The Pomerado is the youngest unit of the Poway Group and is separated from the Stadium Conglomerate by the Mission Valley Formation (also see discussion above regarding the on-site Pomerado Conglomerate). Alluvial material consists of poorly consolidated stream deposited silt, sand, gravel and cobble-sized particles and occurs in major stream channels, including the Beeler Canyon Creek area in which the gravity sewer line is proposed.

Soil associations located along the proposed alignment consist of Redding-Olivenhain and Ramona-Placentia. The Redding-Olivenhain Association is a well-drained gravelly loam and cobbly loam that has a subsoil of gravelly clay over a hardpan of cobbly alluvium. The Ramona-Placentia Association is a well drained to moderately well drained sandy loam that has a subsoil of sandy clay over granitic alluvium. Both of these soil associations have a low to moderate shrink-swell behavior, a very slow runoff permeability, and are highly erosive.

□ **GROUNDWATER**

No groundwater or seepage conditions were encountered during the on-site investigations conducted by GEOCON. However, a seasonal groundwater table has the potential to develop within the alluvial soils. It is likely that during the rainy season, shallow perched groundwater conditions may exist along the bottom of larger natural drainages at the site, such as in Beeler and Sycamore Canyon. Where in-filling of canyons or ravines is planned, the installation of subdrains to relieve the potential for hydrostatic pressure buildup would be required.

□ **GEOLOGIC HAZARDS**

According to the City's Seismic Safety Study, the Precise Plan area lies within geologic Hazard Categories 22, 23, 32 and 53. Portions of the Montecito sub-project site lie in Hazard Categories 32 and 53 and portions of the Sycamore Estates sub-project site lie in Hazard Categories 22, 23 and 32.

Hazard Category 22: is noted for possible or conjectured landslides with a moderate risk potential.

Hazard Category 23: is indicative of slide prone areas.

Hazard Category 32: designates a low potential for liquefaction due to the presence of minor drainages and potentially fluctuating groundwater tables. This category is limited primarily to small portions of Beeler Canyon and Sycamore Canyon within the project site.

Hazard Category 53: is applied to lands that exhibit a favorable geologic structure with a low risk of ground failure.

Ancient Landslides

Geomorphic features suggestive of ancient and/or deep-seated landslides were not observed during the site reconnaissance or encountered during the field investigations conducted by GEOCON. Erosional scarps at the heads of tributary canyons, however, indicate the potential for shallow debris flows in local areas of colluvial accumulations.

Faulting and Seismicity

From a seismic perspective, it should be recognized that much of Southern California is characterized by major, active fault zones. The *Rancho Encantada* project area is located within a seismically active region characterized by northwest trending faults to the San Andreas Fault System. A seismic study conducted as part of the geotechnical analysis did not identify any active or potentially active faults within the project site or immediate vicinity. Active faults are defined as structures which exhibit Holocene displacement (i.e., within approximately the last 11,000 years) or historic seismicity, while potentially active faults are not historically active and displace Pleistocene (11,000 to 2,000,000 years in age) but not Holocene strata (California Division of Mines and Geology [CDMG] 1997). The project site is not located within any designated California Fault Rupture Hazard Zone (formerly Alquist-Priolo Special Studies Zone). These zones are designated by the CDMG to identify active faults and associated setback requirements for habitable structures.

As part of the Project's seismic evaluation, an analysis was conducted to estimate the magnitude and on-site ground accelerations for maximum credible and maximum probable earthquake events along major regional faults. A maximum credible earthquake is defined as the maximum event considered capable of occurring, while a maximum probable earthquake is defined as the maximum event considered likely to occur during a 100-year period. The results of the seismicity analysis are provided in Table 4.4-2, *Maximum Credible & Maximum Probable Earthquake Magnitudes*. Table 4.4-2 represents a list of significant active faults, their distance from the site and a summary of potential ground shaking effects.

As seen from these data, the project site is in the general proximity of several large active faults capable of producing major seismic events. The closest major fault to the project site is the Rose Canyon Fault, which is located approximately 12 miles to the west of the Precise Plan boundary. Due to its proximity, the Rose Canyon Fault exhibits the highest potential on-site ground acceleration values of the faults shown in Table 4.4-2. Historically the Rose Canyon Fault has exhibited low seismicity with respect to earthquakes in excess of Magnitude 5.0 or greater. Major earthquakes occurring on this fault or other regional active faults located in the southern California area could subject the site to moderate-to-severe ground shaking.

Table 4.4-2
MAXIMUM CREDIBLE AND MAXIMUM PROBABLE EARTHQUAKE MAGNITUDES

FAULT	DISTANCE FROM THE SITE (MILES)	MAXIMUM CREDIBLE EARTHQUAKE MAGNITUDE	MAXIMUM PROBABLE EARTHQUAKE MAGNITUDE
Coronado Bank	26	7.4	6.3
Elsinore-Julian	25	7.1	6.4
Earthquake Valley	30	6.5	5.7
San Jacinto-Coyote Creek	46	6.8	6.2
Newport-Inglewood	28	6.9	5.8
Rose Canyon	12	6.9	5.7

Source: GEOCON, June 1999 and September 1999

Liquefaction

Liquefaction is a phenomenon where loose saturated and relatively cohesionless sands lose strength during strong ground motions. Primary factors controlling the development of liquefaction include intensity and duration of ground accelerations, gradation characteristics of the subsurface soil, in situ stress conditions and depth to groundwater. Settlement resulting from liquefaction can significantly affect overlying and subsurface facilities, causing variable degrees of structural damage. The very dense nature of the sedimentary units on-site precludes liquefaction from occurring in these units. The alluvium in the lower lying canyons and tributary drainages may be susceptible to liquefaction in their present condition. However, removal and compaction of the materials as recommended by the Project's geotechnical report and the placement of canyon subdrains to prevent the buildup of groundwater within the canyons would mitigate the liquefaction potential of the alluvial deposits, as discussed below under Impact Analysis. Based upon this information, the liquefaction potential of the site is considered to be very low.

4.4.2 IMPACT ANALYSIS

Issue 1: *Would the proposed project expose people or property to geologic hazards such as earthquakes, mudslides, ground failure or similar hazards?*

Significance Criteria

Significant geologic impacts would occur if property is located in specific Hazard Category Zones 21 through 24, 26, 27, 31, and 41 through 44 because those zones are considered to have potentially

significant geologic constraints. Additionally, projects within 500 feet of an active or potentially active fault are considered to be prone to potentially significant geologic/geotechnical impacts. In addition, the Project would have a significant effect if it would expose people or structures to major geologic hazards.

Impact Analysis

According to the City's Seismic Safety Study, the Precise Plan area lies within geologic Hazard Categories 22, 23, 32 and 53. The Montecito sub-project site lies in Hazard Categories 32 and 53; thus, geologic hazards would not be capable of causing significant impact. The Sycamore Estates sub-project site lies in Hazard Categories 22, 23 and 32. Because the Sycamore Estates site is located in Hazard Category 22 (landslide with moderate risk) and Hazard Category 23 (slide prone areas), geologic hazard impacts would be regarded as potentially significant, unless adequately mitigated. The proposed Sycamore Estates VTM (see Figure 3-11), proposes substantial grading in the area of existing debris flow, that would either completely remove the debris flow material, or would result in relatively flat areas. Therefore, grading as proposed by the Sycamore Estates VTM would avoid by design the potential for a significant geologic hazard impact resulting from the portions of the sub-project site being located in Hazard Categories 22 and 23. On- and off-site sewer line improvements would be constructed in accordance with the Uniform Building Code to withstand a maximum credible earthquake.

The nearest known active fault is located 12 miles from the *Rancho Encantada* site; however, because Southern California is a seismically active region, the Precise Plan area could be subject to moderate to severe ground shaking in the event of a major earthquake. The seismic risk for the project area is not considered to be significantly different from that of surrounding developments in the City of San Diego to the west and in the City of Poway to the north. Impacts associated with faults are not anticipated under the proposed Project.

As noted above under Existing Conditions, surficial soils (previously placed fill, alluvium, topsoil and colluvium) are not considered suitable for the support of fill or structural loads in their present condition. No additional soil or geologic conditions were encountered or identified as part of the site-specific geotechnical investigations which would preclude the development of the property as proposed, provided that the recommendations contained in the Geotechnical Investigation Reports (Appendices C1, C2 and C3 to this EIR) are followed.

Significance of Impacts

Soil and geologic conditions are identified on the *Rancho Encantada* project site which would potentially result in significant impacts. However, implementation of recommendations contained in the Geotechnical Investigation Reports (Appendix C1 to this EIR for Montecito and Appendix C2 to this EIR for Sycamore Estates) would avoid these impacts.

Mitigation, Monitoring and Reporting Program

The use of the following conventional grading techniques and adherence to the recommendations contained in the site-specific Geologic Investigation Reports would avoid all potentially significant geologic impacts.

Montecito and Sycamore Estates Sub-Projects

4.4-1: Prior to the commencement of grading, a geotechnical consultant, satisfactory to the City of San Diego's Environmental Review Manager (ERM), shall be employed for the purpose of observing earthwork procedures and testing the fills for substantial conformance with the recommendations of the projects' Geologic Investigation Reports. The geotechnical consultant shall provide adequate testing and observation services so that it may be determined if the work was performed in substantial conformance with the projects' Geologic Investigation Reports. Such information shall be submitted in writing to the City's ERM. Mitigation measures for soil and excavation activities, grading activities, installation of subdrains, slope construction, foundation design, retaining walls and lateral loads, drainage provisions, and final review of grading plans shall be implemented as a part of the grading plans for the proposed project. Prior to issuance of grading permits, the grading plans shall be approved by the City Planning and Development Review Department.

Issue 2: *Would the proposed project increase the potential for erosion of soils on-or off-site?*

Significance Criteria

Development of the project site would include grading activities which remove the vegetative cover, thereby exposing soils to runoff and erosion. For the purpose of this EIR, the Project would potentially have a significant effect if it would grade more than one acre into slopes over 25 percent grade and would have the potential to cause substantial erosion. The analysis of erosional impacts below is based on this criterion.

Impact Analysis

The Montecito sub-project proposes to grade approximately 153 acres and the Sycamore Estates sub-project proposes to grade approximately 590 acres. These acreages include all proposed utility improvement and detention basin impacts. Because the disturbance area is greater than one acre in slopes over 25 percent, potential erosion impacts would be significant. The majority of the project site is covered by top soils (or other surface materials) that exhibit generally high erosion potentials. Table 4.4-1, *Soils Types*, outlines the limitations of the soils for construction. As shown in the table and on Figure 4.4-2, *Soils Map*, Redding Cobbly Loam, Olivenhain Cobbly Loam, Cieneba-Fallbrook Rocky Sandy Loam, Frait Rocky Fine Sandy Loam, and Placentia Sandy Loam have severe erosion susceptibility and potential for rapid runoff. In addition, soils located along the off-site gravity sewer

alignment exhibit high erosion potential. These soils, along with fill materials used for development areas, would be subject to potentially significant project-related erosion. Specifically, Project development would involve the removal of stabilizing vegetation and exposure of erodible materials on existing hillsides, as well as construction of manufactured slopes and graded pads. Such activities would occur in areas tributary to both Beeler and Sycamore Canyons, including several locations within or immediately adjacent to Beeler Canyon. Accordingly, Project implementation would increase the potential for erosion and transport of sediment both within and downstream of the site. Potential erosion effects would be greatest in steeper areas and during the first season after grading (i.e., before landscaping becomes established). For the gravity sewer design option, the potential exists for increased off-site erosion due to exposure of soils as trenches are excavated for the placement of sewer lines. The erosion and transport of material within the Project boundaries and offsite would generate a number of related potential effects, including damage to graded areas and slopes (e.g., undermining or rilling), exposure of and damage to underground facilities (e.g. foundations or utilities), siltation of downstream drainage courses, structures and habitat, and degradation of downstream water quality (refer to Section 4.5, HYDROLOGY/WATER QUALITY).

As required under the National Pollution Discharge Elimination System (NPDES) Permit, dischargers are required to develop and implement Best Management Practices (BMPs) to control the discharge of pollutants. These BMPs are required of all new developments both during and after construction. These BMPs consist of both structural and non-structural measures, including detention basins, first flush diversion devices, grass-lined filter strips, public education, use of non-toxic landscaping materials, street sweeping and toxic waste collection plans. Accordingly, the project owner/permittee will be required to secure the necessary NPDES permits and implement a Storm Water Pollution Prevention Plan (SWPPP) that comprises of appropriate BMPs for pre- and post-construction activities. Proposed erosion-control features of the Montecito and Sycamore Estates VTMs are described below.

□ **Erosion Control Features of the Montecito Sub-Project VTM**

The Montecito sub-project proposes the use of temporary desiltation basins during project grading and construction. Proposed temporary desilting basins would be constructed at key catch basin inlets to accommodate projected sediment influx from associated drainage areas. These basins would be installed prior to grading of the Montecito sub-project site and would trap sediment eroded during and after sub-project construction, thereby preventing sedimentation of nearby Beeler Canyon and downstream areas. The described desiltation basins would be removed after completion of sub-project construction, and after the landscaping root system has matured on the project site's manufactured slopes (see Figure 3-9, *Montecito PRD Conceptual Landscape Plan*); thus, eliminating potential on-site erosion and sediment transport concerns. The proposed Montecito sub-project also would include three permanent detention basins and associated water quality filtration basins located along key drainage areas between the project site and Beeler Canyon. These three detention basins range in capacity from 0.3 acre-feet (AF) to 9.0 AF and, while intended primarily to control flow volumes, would also settle out eroded material from runoff leaving the site.

□ Erosion Control Features of the Sycamore Estates Sub-Project VTM

The Sycamore Estates sub-project proposes the use of three temporary desiltation basins in strategically located sites downslope of proposed development. Each of the three proposed basins has a 0.2 acre-foot capacity and is designed to accommodate projected sediment influx from associated drainage areas. These basins would be installed prior to sub-project grading and would trap sediment eroded during and after sub-project construction, thereby preventing sedimentation of nearby Beeler Canyon and downstream areas. The described desiltation basins would be removed after completion of construction on the Sycamore Estates sub-project site, and landscaping would be established to the point that upstream erosion and sediment transport is not a concern (see Figure 3-14, *Sycamore Estates PRD Conceptual Landscape Plan*). The proposed Sycamore Estates sub-project also includes three permanent detention basin locations located along key drainage areas. Two would be located between the project site and Beeler Canyon and one would be located south of Rancho Encantada Parkway, north of Planning Area 7A. These basins range in capacity from 7 to 17 acre-feet and, while intended primarily to control flow volumes, would also settle out eroded material from runoff leaving the site.

The proposed project designs for both the Montecito and Sycamore Estates sub-projects incorporate storm water drainage, subsurface drainage and landscaping elements, all of which would serve to reduce the potential for project-related erosion and sediment transport. Specifically, the proposed storm water drainage system would utilize appropriate grading techniques and containment/diversion structures (e.g. brow ditches) to route surface runoff into designated areas and avoid ponding or uncontrolled runoff over more erodible areas such as manufactured slopes. Storm drain outlets also would include protective structures such as concrete or rip rap aprons to prevent localized erosion during storm events. The proposed conceptual landscaping plans proposed as part of the Montecito and Sycamore Estates PRD Permits include restoration of native habitat on most of the larger manufactured slopes, and would conform with applicable requirements of the City of San Diego Landscape Technical Manual. Proposed landscaping would be installed as soon as feasible after grading, and would include such methods as application of hydroseed mix, container stock plantings of native, drought-tolerant species, or re-use of native topsoil on the slopes. The use of such landscaping techniques would help reduce erosion potential by quickly establishing vegetation cover reducing the exposure time of exposed slopes.

Significance of Impacts

Due to the presence of steep topography and topsoils with high erosion potential onsite, as well as the proximity of larger drainage courses, the proposed Project could potentially result in significant short-term erosion and sedimentation impacts. Implementation of off-site sewer improvements in the City of Poway would not contribute to a substantial increase in long-term erosion, but construction-related erosion impacts would be significant. Implementation of the described project design elements and the mitigation measures identified below would reduce all identified potentially significant erosion and sedimentation impacts below a level of significance.

Mitigation Measures, Monitoring and Reporting Program **Proposed Project**

The following mitigation measure applies to both the Montecito and Sycamore Estates sub-projects and in combination with Mitigation Measures 4.5-1 through 4.5-8 in Section 4.5, HYDROLOGY/WATER QUALITY, would reduce potential erosion impacts to below a level of significance.

4.4-2: In conformance with the provisions of Public Resources Code § 21081.6, the sub-project owner/permittee shall retain a mitigation monitor acceptable to the ERM to monitor the grading, construction, and installation of runoff control devices and erosion control revegetation. Prior to the issuance of building permits, the mitigation monitor shall submit in writing to the City Engineer verification that the sub-project has complied with the required notes on the grading plan, landscape plan and Storm Water Pollution Prevention Plan (SWPPP) addressing erosion/urban runoff controls related to erosion control. Grading shall be limited to the dry season (typically March 15 to November 15), unless specific measures for wet season grading are approved for the sub-project by the ERM of the City of San Diego's Planning and Development Review Department.

 Gravity Sewer Design Option

4.4-3: Erosion control measures, as defined in the City of Poway's Grading Ordinance, shall be implemented during construction of the off-site gravity sewer line.

4.5 HYDROLOGY/WATER QUALITY

Hydrology and drainage studies for the proposed *Rancho Encantada* project were conducted separately for each of the two sub-project components, Montecito and Sycamore Estates. Nolte & Associates (Nolte) conducted a study entitled "*Montecito Hydrology Study/Drainage Study*," dated January 2000, and Robert Bein, William Frost & Associates (RBF) conducted a study entitled "*Preliminary Drainage Study for Sycamore Estates*," dated October 2000. These reports are included as Appendices D1 and D2 to this EIR, and also are available for review at the City of San Diego Planning and Development Review Department, 1222 First Avenue, 5th Floor, San Diego CA, 92101.

4.5.1 EXISTING CONDITIONS

□ SURFACE DRAINAGE PATTERNS AND SURFACE WATER

The site is located in the San Diego Hydrologic Region (SDHR), which drains westerly toward the Pacific Ocean. The SDHR is over three million acres in size and is composed of eleven smaller watersheds. Except for a small portion along the southeastern project boundary, the project site is located in the Peñasquitos Watershed, which comprises approximately 103,700 acres of the SDHR. Portions of three cities, including San Diego, Del Mar, and Poway, and a portion of unincorporated San Diego County drain into the watershed. The City of San Diego comprises approximately 83 percent of the watershed area. The project site, being 2,658 acres in size, comprises approximately two percent (2%) of the Peñasquitos Watershed.

According to the Nolte study, the entire Montecito sub-project site, which is part of a total contributing watershed of approximately 670 acres, drains in a northerly direction to existing facilities along Beeler Canyon Road (see Figure 4.5-1). These facilities include two 36-inch culverts under Creek Road at Beeler Canyon Road and two 36-inch culverts under Beeler Canyon Road. Existing on-site culverts also are located in the northern portion of the Montecito sub-project site, associated with the existing single family residence. A portion of the 670-acre watershed (21.2 acres) includes off-site flows from the Scripps Eastview Development, located on the west side of Pomerado Road, west of the proposed project site. Surface drainage throughout the Montecito sub-project site consists of runoff from seasonal precipitation that collects in on-site natural swales and finger canyons. There are no manmade drainage facilities within the Montecito sub-project site.

According to the RBF study, 90 percent of the Sycamore Estates sub-project site drains into Beeler Canyon Creek adjacent to the north of the site, including surface runoff from the existing industrial development located on the Sycamore Estates property (see Figure 4.5-2). Flows from the industrial areas of the sub-project site, which represent less than 7% of the total site flows, utilize the existing on-site private streets to reach natural swales and finger canyons which then carry away the surface runoff. Surface flows that reach Beeler Canyon Creek combine with off-site runoff from the northeast and flow southwesterly through Beeler Canyon. During significant seasonal rainfall events, it can be expected that Beeler Canyon Road would be flooded by these surface flows. No area proposed to be developed within the Sycamore Estates sub-project site is covered by the 100-year floodplain of Beeler Canyon Creek, as mapped by the Federal Emergency Management Agency (FEMA) Flood Insurance

Rate Map [(FIRM) panel 06073C 1367F]. The remaining 10 percent of the Sycamore Estates sub-project site, on the south side of the on-site ridgeline, drains southerly into canyons that cross into MCAS Miramar.

According to the geotechnical report prepared by GEOCON, INC. and titled *Geotechnical Investigation, Montecito Project, San Diego, California* (September 1999), and a second report entitled *Soil and Geologic Reconnaissance, Sycamore Canyon Property, San Diego, California*, also performed by GEOCON, INC., (June 1999) no springs, seeps or groundwater conditions were encountered within the formational units or surficial deposits on the site during the geologic field investigations. It should be expected, however, that the drainage courses within the property periodically contain perched groundwater associated with rainfall along the natural watershed. Perched groundwater levels in alluvial areas are expected to fluctuate seasonally.

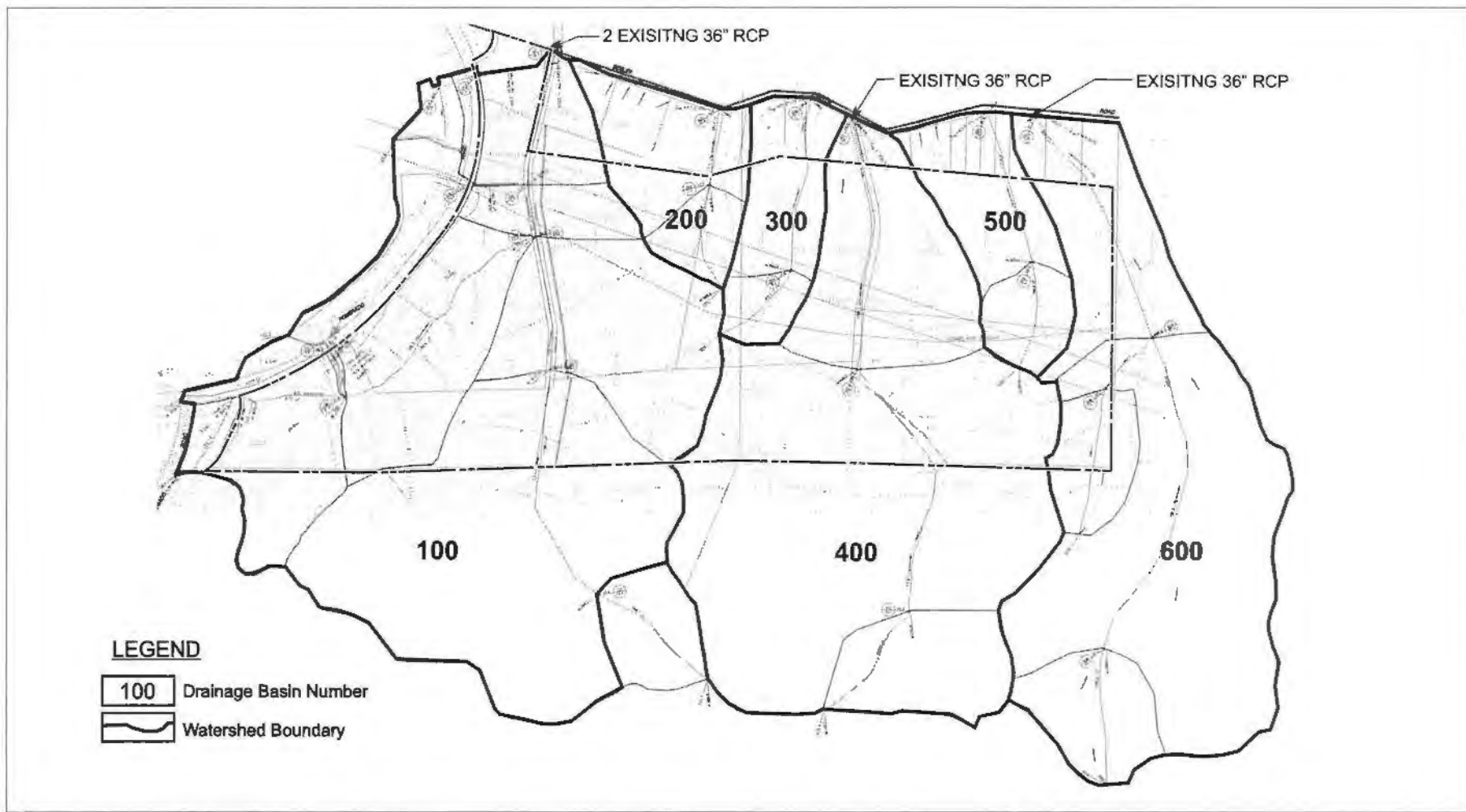
The following tables (Tables 4.5-1 and 4.5-2, *Pre-Development Peak Discharges*) summarize the hydrologic data obtained for pre-development conditions. Table 4.5-1 provides the discharge quantities (in cubic feet per second) for each of the six drainage basins identified within the Montecito sub-project site, based on stormwater flows during a 100-year storm event. The results in Table 4.5-2 provide the discharge quantities (in cubic feet per second) for each of the nine drainage basins identified within the Sycamore Estates sub-project site, based on stormwater flows during a 100-year storm event. As shown in Figures 4.5-1 and 4.5-2, *Existing Watersheds*, there are currently six drainage basins identified within the Montecito (Figure 4.5-1) sub-project site, and nine drainage basins identified within the Sycamore Estates (Figure 4.5-2) sub-project site that drain into Beeler Canyon.

**Table 4.5-1
PRE-DEVELOPMENT PEAK DISCHARGES - MONTECITO SUB-PROJECT SITE**

Basin Number	Area (Ac.)	Q ₁₀₀ (cfs) ¹	Discharge Location
100	262	492.6	Beeler Canyon
200	28	63.2	Beeler Canyon
300	23	51.2	Beeler Canyon
400	182	356.7	Beeler Canyon
500	30	63.8	Beeler Canyon
600	145	269.8	Beeler Canyon

1. Q₁₀₀ (cfs) = cubic feet per second at a 100-year storm flow rate.

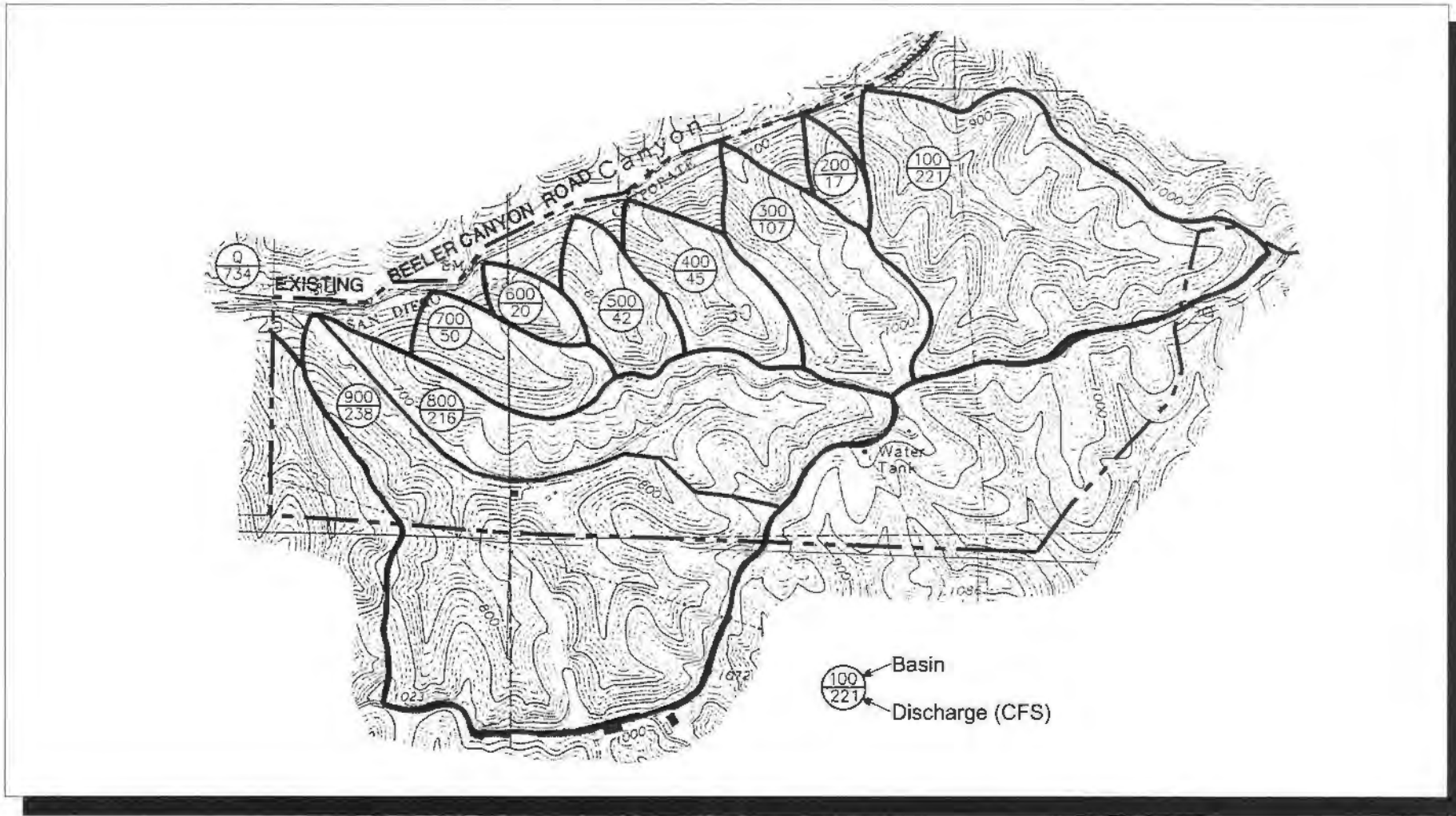
Source: Nolte & Associates; January, 2000



SOURCE: NOLTE ASSOCIATES, INC.

Figure 4.5-1
MONTECITO
EXISTING ON/OFF-SITE HYDROLOGY





SOURCE: ROBERT BEIN, WILLIAM FROST & ASSOCIATES

Figure 4.5-2
SYCAMORE ESTATES
EXISTING ON/OFF-SITE HYDROLOGY

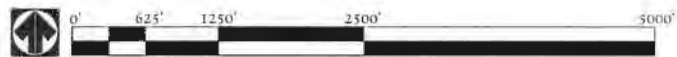


Table 4.5-2
PRE-DEVELOPMENT PEAK DISCHARGES - SYCAMORE ESTATES SUB-PROJECT SITE

Watershed Number	Area (Ac.)	Q ₁₀₀ (cfs) ¹	Discharge Location
100	215	221	Beeler Canyon
200	12	17	Beeler Canyon
300	84	107	Beeler Canyon
400	38	45	Beeler Canyon
500	35	42	Beeler Canyon
600	16	20	Beeler Canyon
700	41	50	Beeler Canyon
800	208	209	Beeler Canyon
900	230	238	Beeler Canyon

1. Q₁₀₀ (cfs) = cubic feet per second at a 100-year storm flow rate.

Source: RBF & Associates, March 16, 2000

100-YEAR FLOODPLAIN

No portions of the proposed Precise Plan area are located within a 100-year floodplain as mapped by the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Maps (FIRM). However, portions of the off-site gravity sewer alignment in the City of Poway are located in the mapped 100-year floodplain of Beeler Canyon Creek.

WATER QUALITY AND SENSITIVE WATER BODIES

Assessments of regional water quality for the project site vicinity range from “good” to “intermediate” for upper and lower Los Peñasquitos Creek, respectively, and “unknown” for Sycamore Canyon Creek (RWQCB, 1991). Known water quality data in the immediate site vicinity area are associated with historical (1985) measurements from Beeler Creek at Pomerado Road (USGS, 1989). These data documented historically good water quality in Beeler Creek, with total dissolved solids (TDS) levels of 420 milligrams per liter (mg/l). No known current data are available for the project site and vicinity, although surface water quality is expected to be somewhat lower than that recorded in 1985 due to urban development since that time. Specifically, undeveloped areas typically contribute lower quantities of contaminants such as bacteria, pesticides, nutrients, solids, and metals than urban or agricultural zones (Wigington, 1983).

Groundwater quality in the Poway and San Diego River Valley basins is classified as “intermediate” by the RWQCB (1991). Known groundwater quality in the site vicinity area are associated with 1984-5 measurements from Beeler and Sycamore Canyon Creeks, with these data reflecting intermediate water

quality. Specifically, TDS levels of 1,100 mg/l were recorded at one sample point along Sycamore Creek approximately ½-mile northeast of the project site, and TDS levels ranging between 830 and 990 mg/l were noted from two sample points located along Beeler Creek approximately ¼ to ½-mile west of the site (USGS, 1989). No current groundwater quality data are available for the project site and vicinity, although groundwater quality may be somewhat lower than that recorded in 1985 due to increased urban development in the area.

Runoff from the project site flows from Beeler Canyon to Penasquitos Canyon, into Los Peñasquitos Lagoon, eventually draining into the Pacific Ocean. Los Peñasquitos Lagoon is located approximately 12 miles west of the project site and covers about 385 acres. It is recognized as an important coastal resource because of its unique flora and fauna. The lagoon is owned by the State of California and is designated as a natural preserve with the Torrey Pines State Reserve. As urban development occurs within the watershed, viability of the lagoon's flora and fauna can be adversely affected. The sensitive ecosystem of the lagoon is affected by urban runoff which often carries pollutants that can upset the delicate balance of the lagoon. Analysis of sediment cores has led scientists to conclude that sediment rates of 0.014 - 0.032 inches per year that had been occurring prior to European settlement had increased to 0.154 - 0.179 inches per year by 1980. According to the State Coastal Conservancy, sedimentation has a strong influence on keeping the mouth of the Lagoon closed, restricting tidal flushing that would benefit wildlife habitat. The sensitive ecosystem of the lagoon is also affected by increased dry-season fresh water runoff from irrigation of landscaped areas. This will alter the balance of salt to fresh water in the estuary, encouraging the growth of fresh and brackish water plants at the expense of coastal salt marsh. The San Diego Regional Water Quality Control Board (RWQCB) has designated the lagoon as a 303D impaired water body. That status means that the lagoon's water quality has been impaired due to heavy sedimentation and siltation. The RWQCB does not have a plan in place to prevent further impairment to the lagoon. The lagoon has been designated, also by the RWQCB, as a medium priority for creating an Implementation Plan that would establish maximum load requirements for projects proposed within the lagoon's watershed.

□ STORMWATER

Construction of any project in the City of San Diego is subject to the requirements of erosion control in the City's Grading Ordinance. Construction of any project in the City of Poway (as it applies to the proposed gravity sewer design option of the proposed Project) is subject to the requirements of erosion control in the City of Poway Municipal Code, Title 16, Division III. Projects also are required to comply with the Clean Water Act. Conformance with the Clean Water Act is established through compliance with the requirements of the State Water Resources Control Board's (SWRCB) National Pollutant Discharge Elimination System (NPDES) General Permit No. CAS000002. For this permit, the SWRCB issued Order No. 92-08-DWQ, "Waste Discharge Requirements for Discharges of Stormwater Runoff Associated with Construction Activity." To comply with the permit, the applicant for a construction permit must file a complete and accurate Notice of Intent with the SWRCB. Compliance requires conformance with applicable best management practices (BMPs) and development of a Storm Water Pollution Prevention Plan (SWPPP) and monitoring program plan. When construction is completed, the applicant must file a Notice of Termination with the SWRCB.

For the management of stormwater, municipalities in the San Diego region, including the City of San Diego, must comply with the RWQCB's NPDES Permit No. CA0108758, that consists of wastewater discharge requirements for stormwater and urban runoff. When the Notice of Termination for construction is filed, implementation of stormwater discharge BMPs, including maintenance and monitoring, is required by the owner/permittee or homeowners association pursuant to the City of San Diego's Permit No. CA0108758.

BMPs appropriate to the characteristics of the project would be employed to reduce pollutants available for transport or to reduce the amount of pollutants in runoff prior to discharge to a surface water body. BMPs typically employed where the increase in impervious surfaces substantially increases runoff rates and volumes include detention basins, infiltration basins, infiltration trenches vegetative controls, grassed swales, and similar methods. In addition, BMPs also can include nonstructural methods, such as controlling litter and waste disposal practices.

4.5.2 IMPACT ANALYSIS

Issue 1: What effect would the proposed project have on existing drainage patterns, absorption rates, or the amount and rate of surface runoff?

Significance Criteria

Significant impacts to the circulation and drainage of surface waters would occur if any of the following conditions would result from Project implementation:

- a. increased flooding on- or off-site;
- b. placement of development within an existing 100-year floodplain as mapped by the Federal Emergency Management Agency (FEMA);
- c. increased or uncontrolled runoff, such that it would result in erosion and subsequent sedimentation of downstream water bodies;
- d. modifications to existing drainage patterns, such that it would result in degradation in the function and value of existing biological habitat or if it would affect the habitat type; substantial changes to stream-flow velocities (> 5 cfs) or quantities; or
- e. extraction of water from an aquifer.

Impact Analysis

With development of the proposed Project, drainage would continue to be directed into Beeler Canyon Creek. The Montecito VTM proposes a balanced grading operation on-site, with 3.6 million cubic yards of cut and fill occurring over an approximate 153-acre disturbance area. The Sycamore Estates

VTM also proposes a balanced grading operation, with 14.9 million cubic yards of cut and fill occurring over an approximate 590-acre disturbance area. Existing on-site drainage patterns in areas proposed for grading would be modified from the existing sheet flow condition to planned discharge locations. Utility improvements, including the off-site sewer line improvements necessary under the gravity sewer design option, would be located underground and the ground surface would be returned to its existing condition after construction; thus, no increased runoff would occur and hydrology would not be affected.

The development of natural areas often causes an increase in the amount of runoff as a direct result of creating impervious surfaces. Impervious surfaces include paved streets, patios, driveways, and foundations for structures and vary based on types of uses and allowable maximum coverages. The proposed Project would contain a total of approximately 33.6 acres of major roadways of various right-of-way widths. Each right-of-way width would have a percentage of its total surface comprised of impervious pavement and walkways and porous landscaped parkways. Utilizing proposed Rancho Encantada Parkway as a typical roadway (80' right-of-way with 16.5' of parkway landscaping), results in approximately 80% of the right-of-way being constructed of impervious materials. 80% of the total 33.6 acres of major roadways yields approximately 26.9 acres of impervious surfaces.

Similarly, impervious surface ratios can be determined for the proposed combination of residential, school and existing industrial uses. Based on City of San Diego Municipal Code requirements and the proposed Montecito and Sycamore Estates PRDs, the residential areas of the proposed Project could permit up to a maximum building coverage of 50 to 60 % of the lot area. Additionally, impervious paving and hardscape can account for no more than 70% of the required yard. Applying a conservative impervious lot coverage ratio of 70% to the proposed Montecito sub-project site's total developed area (106.6 acres), yields a total of approximately 74.6 acres of impervious surfaces. Applying this same percentage to Sycamore Estates' total developed area, (399.3 acres), yields approximately 279.5 acres of impervious surfaces. At buildout, it is estimated that a maximum of approximately 381 acres (14 percent) of the project site would be impervious surfaces, including development areas and roadways. The remaining 2,277 acres of the *Rancho Encantada* project site would be open space or porous landscaped areas.

Storm runoff generated within the proposed development areas would be conveyed off proposed lots into streets. The streets would convey the runoff to curb inlets that drain into a proposed underground storm drain system within the streets (see Figure 3-6, *Conceptual Drainage Plan*, in Chapter 3.0, PROJECT DESCRIPTION). To minimize impacts, the proposed storm drains are planned to discharge into natural drainage courses under controlled discharge conditions. Storm flow velocities would be reduced to non-erosive velocities by dissipating the energy in the flow using impact dissipaters and/or rock streambed protection and vegetative filter strips. Provided below is an analysis of drainage pattern modifications that would occur as a result of the Montecito and Sycamore Estates sub-projects.

□ Montecito Sub-Project

The Montecito sub-project's hydrology/drainage analysis prepared by NOLTE & ASSOCIATES calculates storm flow rates for a 100-year storm frequency. These storm flows were used during the analysis to investigate the impact of the proposed Montecito sub-project on six

existing watersheds. The following table (Table 4.5-3, *Pre-Development and Post-Development Watershed Area and Flow Rate Comparison-Montecito*) illustrates the net effect to each watershed. The net effect of the proposed Montecito development would be a total peak discharge decrease of 81.1 cubic feet per second (cfs) during a 100-year storm event. The peak discharge rate would be decreased due to the construction of on-site detention basins, which would slow storm water discharge. During a 100-year storm event, impacts would not be considered significant because peak runoff rates would not be increased. On an average annual basis, the volume of fresh water leaving the sub-project site is calculated by the project engineer to be 21.7 acre-feet per year (af/y), compared to 15 af/y which would occur under existing conditions.

If detention basins were not proposed as part of the Montecito sub-project, runoff rates would be increased over existing conditions due to the introduction of impervious surface area on the site, which causes water to runoff faster than under natural conditions. Without the proposed detention basins, significant impacts due to increased runoff rates would occur. Thus, the incorporation of detention basins into the project design would avoid significant impacts.

Table 4.5-3
PRE-DEVELOPMENT AND POST-DEVELOPMENT WATERSHED AREA AND FLOW RATE COMPARISON
MONTECITO SUB-PROJECT (WITH PROPOSED DETENTION BASINS)

Watershed Number	Pre-Developed Area	Post- Developed Area	Pre-Developed Q_{100}	Post-Developed Q_{100}	Difference Q_{100}
100	262	264	492.6	483.4	-9.2
200	28	26	63.2	57.7	-5.5
300	23	20	51.2	42.3	-8.9
400	182	218	356.7	361	4.3
500	30	16	63.8	36.7	-27.1
600	145	126	269.8	235.1	-34.7
TOTALS	670	670	1297.3	1216.2	-81.1

Source: Nolte & Associates; January 2000

The proposed Montecito sub-project site consists of four valleys which would be crossed by the proposed development. The watercourses would remain primarily natural watercourses upstream and downstream of the proposed development fill. As shown on Figure 4.5-3 *Proposed On/Off-Site Hydrology Map - Montecito Sub-Project*, three culverts are proposed to convey the flows under the areas of deep fill. These culverts would convey upstream drainage from the areas to the south, northerly beneath the proposed development to the watercourse north of the proposed development fill. The hydrology study proposes to include three detention basins, one in Basin 100 and two in Basin 400. These proposed detention basins

would detain increased flows within the individual basins and could improve water quality by providing an opportunity for reduced velocities and settling out of sediments.

The westerly drainage includes three basins, in the existing Scripps Eastview Development, which flow under Pomerado Road into the proposed Montecito sub-project. The most southerly of three culverts would be rerouted to flow under proposed Rancho Encantada Parkway. The remaining two existing culverts would not be modified since they carry flow northerly into Beeler Canyon away from the proposed development area. Storm runoff generated within the proposed sub-project would be conveyed off proposed residential lots into streets. The streets would convey the runoff to curb inlets that drain into a proposed underground storm drain system. To minimize impacts, the proposed storm drains are planned to discharge into natural watercourses in the vicinity of the outlets of the deep fill culverts, sharing rip-rap blankets to dissipate erosive velocities.

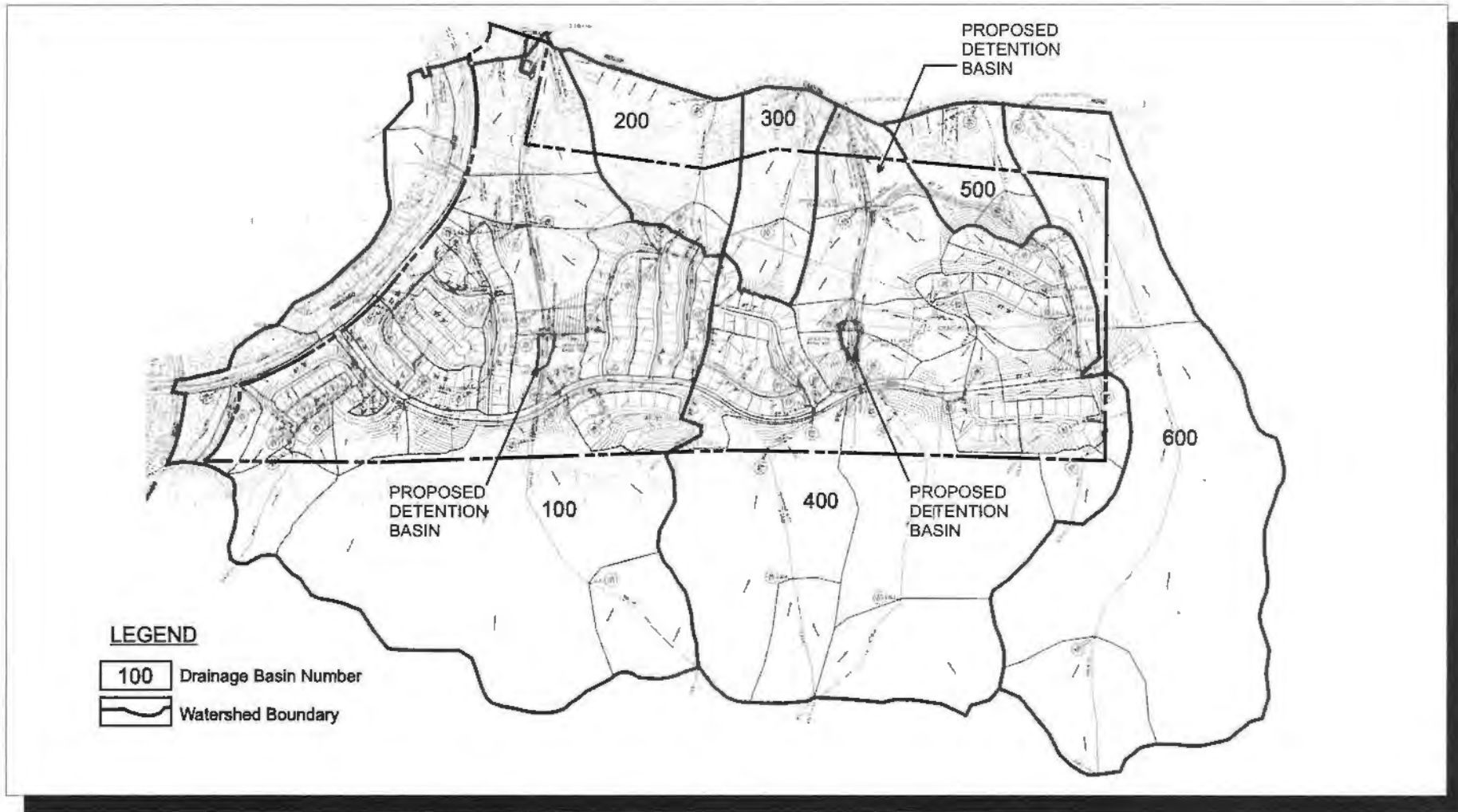
The proposed Montecito sub-project would substantially change stream flow velocities, but with the construction of proposed detention basins, water velocities (i.e., rates) leaving the site would be the same or less than would occur under existing conditions. The sub-project also would not alter existing drainage patterns, and would not generate uncontrolled runoff, therefore, impacts would not be significant.

□ Sycamore Estates Sub-Project

The Sycamore Estates sub-project's hydrology/drainage analysis prepared by RBF & ASSOCIATES calculates storm flow rates for a 100-year storm frequency. These storm flows were used during the analysis to investigate the impact of the proposed sub-project on the existing watersheds that drain into Beeler Canyon Creek. Table 4.5-4 (*Pre-Development and Post-Development Watershed Area and Flow Rate Comparison-Sycamore Estates*) illustrates the net effect to each watershed. The eight post-development basins generally correspond to the nine pre-development basins, with Basin 800 corresponding to pre-development Basins 800 and 900 combined. The net effect of the proposed Sycamore Estates development would be a total peak discharge increase of 0 cfs. The post-development peak discharge rate would equal the pre-development peak rate. This is achieved through the on-site detention facilities that slow storm water drainage. During a 100-year storm event, impacts would not be considered significant because peak runoff rates would not be increased. On an annual average basis, the volume of fresh water leaving the sub-project site is calculated by the project engineers to be 32 acre-feet per year (af/y), compared to 23 af/y which would occur under existing conditions.

If detention basins were not proposed as part of the Sycamore Estates sub-project, runoff rates would be increased over existing conditions due to the introduction of impervious surface area on the site, which causes water to runoff faster than under natural conditions. Without the proposed detention basins, significant impacts due to increased runoff rates would occur. Thus, the incorporation of detention basins into the project design would avoid significant impacts.

An intentional drainage area diversion has been designed for water quality and sensitive biological resource purposes. The diversion is designed to prevent urban runoff, particularly



SOURCE: NOLTE ASSOCIATES, INC.

Figure 4.5-3
MONTECITO
PROPOSED ON/OFF-SITE HYDROLOGY



urban irrigation runoff in the summer season, from reaching the southerly draining canyons that lead off-site. As discussed in Section 4.3, BIOLOGICAL RESOURCES, these canyons lead to populations of willowy monardella located southerly and off-site. The area diversion amounts to approximately 14% of the total existing watershed for the populations. The resulting modifications to the existing watersheds for the willowy monardella would not result in degradation in the function and value of existing biological habitats and would not affect existing habitat types. Introducing summertime urban runoff into the canyons would be expected to result in such degradation and loss of value, and has been avoided through this design feature.

The area diversion totals 62 acres. Urban flows from this area would be directed away from the southerly canyons and into Beeler Canyon. This diversion does not result in an increase in peak discharge because the on-site detention facilities have been designed to attenuate any additional flow from the area diversion.

Table 4.5-4
PRE-DEVELOPMENT AND POST-DEVELOPMENT WATERSHED AREA AND FLOW RATE COMPARISON
SYCAMORE ESTATES SUB-PROJECT

Watershed Number	Pre-Developed Area	Post- Developed Area	Pre-Developed Q_{100}	Post-Developed Q_{100}	Difference Q_{100}
100	215	202	221	213	-8
200	12	7	17	9	-8
300	84	177	107	246	+139
400	38	12	45	17	-28
500	35	11	42	16	-26
600	16	46	20	69	+49
700	41	45	50	26	-24
800	208	441	209	499	+290
900	230	0	238	0	-238

Source: RBF & Associates; March 16, 2000

According to the RBF Hydrology Study, all developed site run-off would be conveyed into Beeler Canyon Creek where it combines with offsite runoff from the northeast (see Figure 4.5-4 *Proposed On/Off-Site Hydrology Map - Sycamore Estates Sub-Project*). The combined runoff would flow southwesterly through Beeler Canyon and ultimately to three 11'x10' box culverts which comprise the main storm system at Pomerado Road and Scripps Poway Parkway approximately one mile from the sub-project site.

The proposed Sycamore Estates sub-project would substantially change stream flow velocities, but with the construction of proposed detention basins, water velocities (i.e., rates) leaving the site would be the same as that which would occur under existing conditions. The sub-project also would not alter existing drainage patterns to the extent that they significantly affect existing sensitive biological resources, and would not generate uncontrolled runoff, therefore, impacts would not be significant.

□ **Off-Site Gravity Sewer Design Option**

As a design option of the proposed Project, a gravity sewer line is proposed as shown on Figure 3-5A, *Off-Site Gravity Sewer Design Option*. Gravity sewer improvements would occur within the City of Poway, and portions of the improvements would be located in a 100-year floodplain. The construction of the proposed underground improvements would conform to the National Flood Insurance requirements and local ordinance. The improvements would not increase flood levels or impair the ability of the floodway to carry and discharge the waters resulting from the one-hundred-year flood; thus, impacts would not be significant.

Significance of Impacts

Montecito Sub-Project

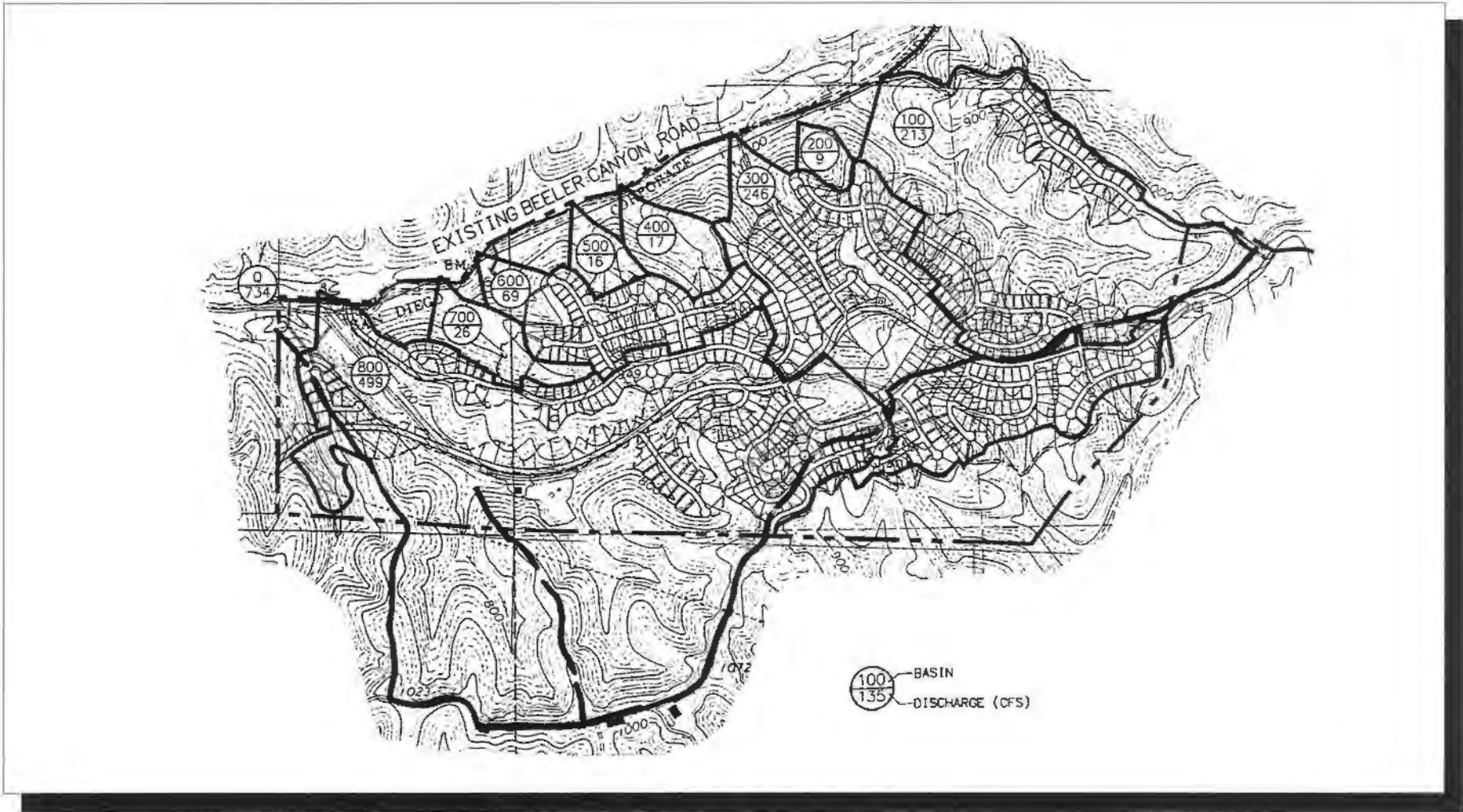
The net effect of the proposed Montecito development would be a peak discharge decrease of 81.1 cubic feet per second (cfs) during a 100-year storm event due to the use of on-site detention basins to slow peak flows. Thus, the sub-project would not result in significant direct adverse impacts to existing drainage patterns. (Erosion control measures are addressed in Section 4.4, GEOLOGY/SOILS.)

Sycamore Estates Sub-Project

The net effect of the Sycamore Estates sub-project would be a 0 cfs net change with the use of on-site detention basins to reduce post-development peak flows to pre-development levels. A 62-acre drainage area diversion would occur on the Sycamore Estates sub-project site to prevent urban runoff from reaching the southerly trending canyons. This drainage area diversion is not considered a significant impact because it would not result in significant impacts to existing sensitive biological resources. Uncontrolled runoff also would not occur. Thus, the proposed sub-project would not result in significant direct adverse impacts to existing drainage patterns. (Erosion control measures are addressed in Section 4.4, GEOLOGY/SOILS.)

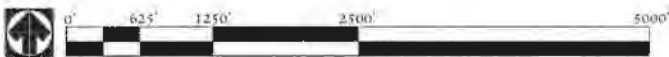
Mitigation Measures, Mitigation Monitoring and Reporting Program

Impacts would not be significant; therefore, no mitigation is required.



SOURCE: ROBERT BEIN, WILLIAM FROST & ASSOCIATES

Figure 4.5-4
SYCAMORE ESTATES
PROPOSED ON/OFF-SITE HYDROLOGY MAP



Issue 2: *Would the proposed project affect surface or ground water quality?***Significance Criteria**

Significant impacts to the quality of surface or ground water quality would occur if any of the following conditions would result from Project implementation:

- a. result in water pollution and/or contamination that would significantly impact human health and safety, and biological communities;
- b. result in erosion and subsequent sedimentation of water bodies (this would potentially occur if a project proposes to grade more than 1 acre of land, especially in 25% slopes);
- c. result in groundwater contamination that exceeds the thresholds of significance established by the County/Federal standards set by County Hazardous Materials Management Division;
- d. create 20 or more parking spaces.

Impact Analysis**□ Proposed Project**

Development of a portion of the project site with residential uses, a school/park site, two institutional sites, roadways, and associated infrastructure and landscaping would result in an increase in the amounts of urban pollutants over existing conditions. Short-term water quality impacts to the drainage basin would be expected during the grading and construction phases of the proposed Project when cleared and graded areas would be exposed to rain and surface runoff. Improperly controlled runoff would result in erosion and transport of the sediment to the basin. An analysis of erosion and sedimentation is contained in Section 4.4, GEOLOGY/SOILS, of this EIR.

The long-term water quality impact potential would be related to contaminated urban runoff caused by the introduction of urban uses and impervious surface areas to the site. From the time construction begins on the site, through the lifetime of the development, runoff flowing across the site can pick up contaminants from landscaping, such as pesticides and fertilizers, and areas used by motor vehicles, such as parking lots, driveways, and streets. Pollutants from such areas can include oils, fuel residues, heavy metals (associated with gasoline), fertilizers, and pesticides. The runoff from future streets, rooftops and parking areas would carry quantities of harmful materials such as oil, rubber, metals (including lead), pathogens, trash and other solid wastes. These pollutants would adversely affect the water quality in Beeler Canyon Creek and would increase the amount and concentration of urban pollutants entering the drainage basin.

Potentially significant water quality impacts to Sycamore Canyon Creek or other waters located south of the project site would occur. A potentially significant water quality impact also would occur at the affordable housing site and at the school/park site proposed by the Precise Plan and the Sycamore Estates sub-project because more than 20 parking spaces would be required in these two areas.

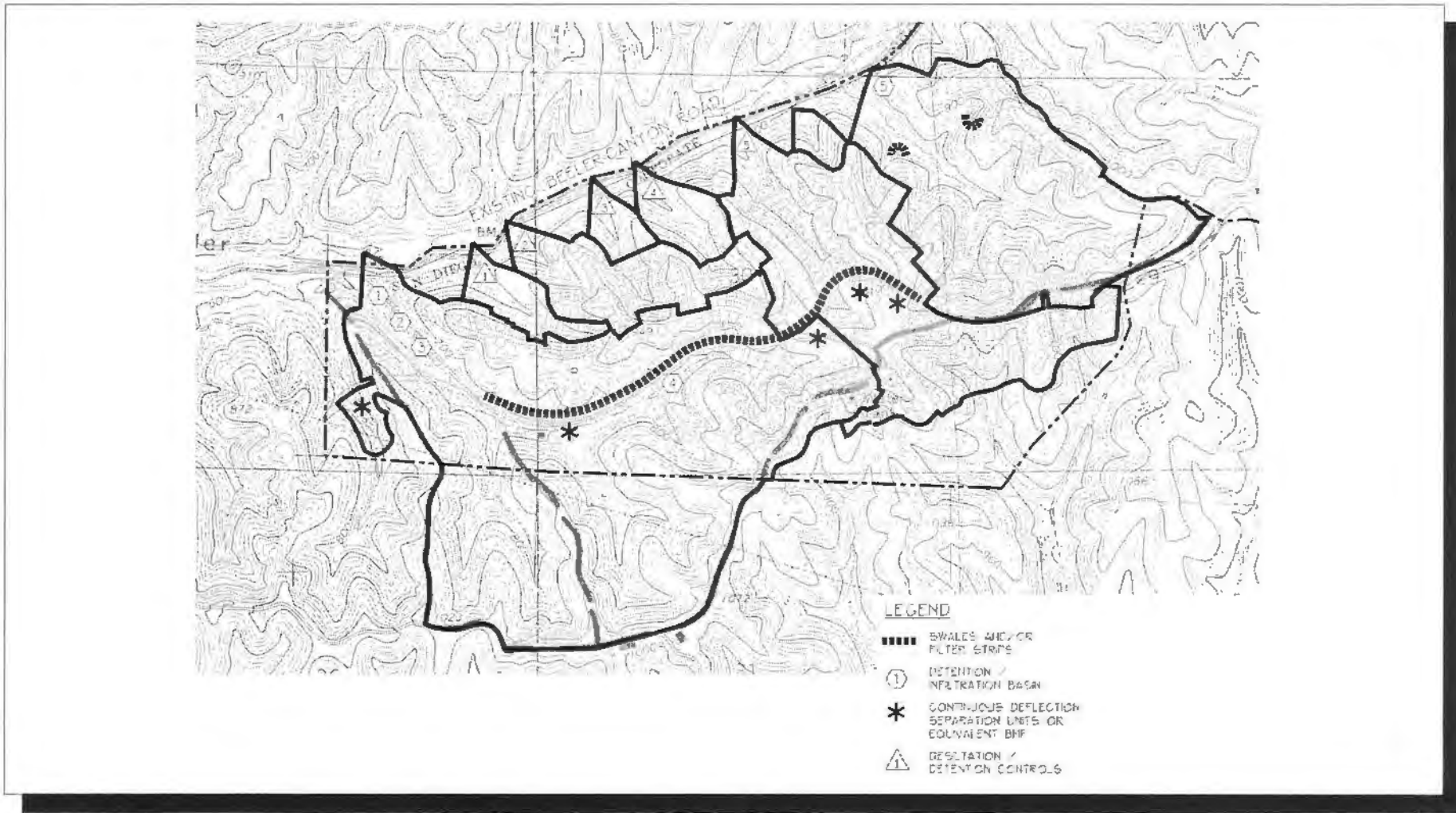
A drainage area diversion is proposed to prevent urban runoff from flowing into the southerly trending canyons that cross into MCAS Miramar. As proposed by the Sycamore Estates VTM, all urban runoff would be diverted into Beeler Canyon Creek. Thus, no urban runoff would drain into the southerly draining canyons.

Existing developed properties located north of the proposed Project site along Beeler Canyon Road use water wells. Rancho Encantada's domestic and irrigation water would be supplied by the City of San Diego water system; thus, potential impacts to well water draw down would be precluded. The most common sources of contamination of wells in areas like Beeler Canyon are septic systems located near the wells and pesticide and herbicide use by residents with wells on their own properties. Well water contamination from sources farther away is less likely to be significant. It is estimated that groundwater in Beeler Canyon currently has low (part per billion range) organic contamination of a man-made origin. Additional contribution by the Rancho Encantada project is not likely to result in the exceeding of a Maximum Contaminant Level (MCL) as established by the Clean Water Act. The Rancho Encantada project would incorporate permanent water quality measures that address potential negative impacts to ground water quality and reduce the potential for water well contamination to a less than significant level.

In addition to urban pollutants reaching Beeler Canyon Creek, sedimentation would occur in downstream water courses; however, paved areas generate less sediment than unpaved areas. No significant long-term sedimentation and siltation are anticipated to occur during the long-term operation of the project. The potential for sedimentation and siltation effects on downstream water resources from project construction and grading activities is considered a significant short-term impact. Siltation and erosion control facilities would be provided during construction of the project.

All permanent drainage facilities would be designed and built in accordance with the City of San Diego Drainage Design Manual and would incorporate the most current BMPs as defined in the NPDES guidelines and detailed in the "California Storm Water BMP Handbook."

As required under the NPDES Permit, dischargers are required to develop and implement BMPs to control the discharge of pollutants. BMPs appropriate to the characteristics of the Project would be employed to reduce pollutants available for transport or to reduce the amount of pollutants in runoff prior to discharge to a surface water body. The following is a list of Project Design BMPs. Structural and non-structural/housekeeping BMPs are included as mitigation measures below. The sub-project owners/permittees would be required to secure the necessary NPDES permits and implement the appropriate BMPs for construction activities and structural improvements. (See Figure 4.5-5, *Proposed Structural BMP*).



SOURCE: RBF & ASSOCIATES



Figure 4.5-5
PROPOSED STRUCTURAL BMP

Project Design BMPs

Stormwater quality considerations have been incorporated into the Project concept and design. These design features constitute design BMPs that will result in improved stormwater quality compared to the Project without these design BMPs.

1. *Minimizing the size of disturbed area and reducing the percentage of impervious area.* The proposed development would leave approximately 75% of the property in its undeveloped condition. Clustering the development on 25% of the site reduces the percentage of the property made impervious and the percentage of the property disturbed. Compared to a typical non-clustered design which would develop approximately 50% of the site, impervious surface area has been reduced by half.
2. *Disconnecting impervious areas.* The impervious areas would not be connected directly to the receiving waters but would be set back significantly. This permits treatment of the stormwater by structural and non-structural methods well in advance of the storm water entering the receiving waters.
3. *Revegetating cleared and graded areas and existing firebreaks.* Cleared and graded areas, including manufactured slopes and existing industrial building pads, are proposed to be revegetated using native and low water requirement vegetation as part of a comprehensive erosion control program. Existing fire breaks on the Sycamore Estates sub-project site not being used as trails would also be revegetated. Revegetation is often cited as the single most effective method of mitigating erosion.

Under developed conditions, storm events of low intensity or short duration would normally produce slightly increased amounts of runoff due to the increase in impervious surfaces (referred to as the first flush conditions). Without filtering, the short-term increase in runoff associated with first flush, some pollutant loads of organic wastes, nitrogen, phosphorous, hydrocarbons, heavy metals and pesticides would increase over existing conditions, which is regarded as a potentially significant impact to surface water quality.

Off-Site Gravity Sewer Design Option

As a design option of the proposed Project, a gravity sewer line is proposed in the City of Poway. The line would be located underground and the ground surface would be restored to its existing condition. As such, no increase in the amounts of urban pollutants would occur over existing conditions. Short-term water quality impacts to the drainage basin would be expected during the construction phase when the excavated trench would be exposed to rain and surface runoff. Improperly controlled runoff would result in erosion and transport of the sediment to Beeler Canyon and Beeler Canyon Creek. An analysis of erosion and sedimentation is contained in Section 4.4, GEOLOGY/SOILS, of this EIR. The potential for sedimentation and siltation effects on downstream water resources during construction of the sewer line is considered a significant short-term impact. Siltation and erosion control facilities would be provided during construction as required by the City of Poway.

Significance of Impacts **Proposed Project**

Both the Sycamore Estates and Montecito sub-projects would have significant direct and cumulative short- and long-term water quality impacts.

 Off-Site Gravity Sewer Design Option

Construction of an off-site gravity sewer line in the City of Poway would have significant direct and cumulative short-term water quality impacts during construction.

Mitigation Monitoring and Reporting Program **Proposed Project**

Implementation of the following mitigation measures would reduce the direct short- and long-term water quality impacts of the Proposed Project to below a significant level. As discussed in Section 5.0, CUMULATIVE EFFECTS, cumulative water quality impacts would remain significant because BMPs are not 100 percent effective. The following measures apply to both the Montecito and Sycamore Estates sub-projects unless otherwise noted.

- 4.5-1: Prior to the issuance of grading permits, the owner/permittee shall provide evidence, in the form of an acknowledgment from the SWRCB assigning the project its WDID Number, of intent to be covered under the National Pollutant Discharge Elimination System (NPDES) General Permit No. CAS000002. The WDID Number shall be listed on the project grading plans.
- 4.5-2: Prior to the issuance of grading permits, the owner/permittee shall prepare a Storm Water Pollution Prevention Plan (SWPPP) prepared in compliance with the NPDES General Permit requirements and the requirements of the Land Development Review (LDR) Division of the City of San Diego. The Environmental Review Manager (ERM) of the LDR Division shall approve the SWPPP prior to the issuance of the grading permits. The SWPPP shall include a permanent maintenance plan, prepared satisfactory to the ERM, that defines the party responsible for the permanent maintenance of each and all post-construction BMPs. The permanent maintenance plan shall define the method and schedule for maintenance of all permanent BMPs.

The SWPPP shall contain construction-related (temporary) BMPs including, as a minimum, the following:

- a. Hydroseeding/hydromulching of all disturbed natural and manufactured slopes with seed mixes approved by the ERM.

- b. A schedule for hydroseeding/hydr mulching of completed slopes approved by the ERM.
- c. BMPs specifically designed to address construction-related impacts to sensitive plant species located in southerly trending drainages (Sycamore Estates sub-project only).
- d. Other temporary BMPs approved by the ERM.

The SWPPP shall contain permanent post-construction BMPs to control the rate, volume and quality of runoff leaving the site and reduce the amount of pollutants and sediments discharged from the site including, as a minimum, the following:

Structural BMPs

- e. *Swales.* Swales are channels with a relatively mild longitudinal slope and shallow sideslope that are typically grassed or vegetated. They are designed for slow velocities during small storms, allowing opportunity for infiltration along the swale bottom and for the trapping of sediment and organic biosolids in the vegetative cover. Swales are typically located along roadways and other impervious areas. Swales and other BMPs that promote infiltration are feasible in areas with permeable soils (Soil Types A and B). This type of BMP should not be located above fill slopes or in other areas where infiltration can create soil or structural problems.

The best opportunity for swales is in the Sycamore Estates sub-project adjacent to Rancho Encantada Parkway. In combination with filter strips, the swales can treat storm water before it enters the storm drainage system. The measures must be designed and implemented with proper pavement drainage and traffic safety requirements in mind.

- f. *Filter Strips.* Sometimes called buffer strips, filter strips perform in a manner similar to swales but are not channels. Receiving flow is characteristically sheet flow. Filter strips are mildly sloping vegetated surfaces that are located adjacent to an impervious surface area. They are designed to slow the velocity of the runoff from the impervious area, thereby increasing the opportunities for infiltration and the trapping of pollutants. Filter strips and other BMPs that promote infiltration are feasible in areas with permeable soils (Soil Types A and B). Filter strips and other BMPs that trap pollutants in vegetative cover are feasible when they can be located away from heavily-traveled areas. This type of BMP should not be located above fill slopes or in other areas where infiltration can create soil or structural problems.

The best opportunity for filter strips is within the Sycamore Estates sub-project adjacent to Rancho Encantada Parkway. In combination with drainage swales, the filter strips can treat storm water before it enters the storm drainage system. The design and implementation must be compatible with proper pavement drainage and traffic

safety requirements. In addition, filter strips can be installed at storm water drainage outfalls within canyons.

- g. *Infiltration Basins and Percolation Trenches.* These treatment controls capture runoff generated by small storms and provide good storm water treatment by transferring surface runoff to the groundwater regime. This filters out suspended pollutants and provides other treatment processes before water returns to the surface systems. Infiltration basins, percolation trenches and other BMPs that promote infiltration are feasible in areas with permeable soils (Soil Types A and B). This type of BMP should not be located above fill slopes or in other areas where infiltration can cause soil or structural problems

In the Sycamore Estates sub-project the only feasible location for infiltration basins and percolation trenches is within canyons where the soils permit infiltration. The sub-project proposes to use infiltration basins located in conjunction with detention basins as the primary stormwater collection and treatment BMPs. In the Montecito sub-project, infiltration basins shall be provided in conjunction with the detention basin sites.

- h. *Detention Controls.* Detention controls include extended detention basins (dry) which drain out completely between storm events, and retention ponds (wet), which retain storm runoff from a given event within its permanent pool until the next storm occurs. Retention ponds are not feasible for this project. Detention basins remove pollutants primarily through sedimentation of solids, but also through biochemical processes in the basin during the dry weather periods that follow storms.

The Sycamore Estates VTM and the Montecito VTM include several detention basins primarily designed for flood-peak attenuation. These basins shall be constructed in conjunction with infiltration basins and vegetation basins. In conjunction with these other basins, but also on their own, the detention basins will provide a benefit in improving storm water quality.

- i. *Continuous Deflective Separation (CDS) Units or Equivalent BMPs.* Continuous deflective separation units or equivalent BMPs capture and retain floatables, trash, and debris larger than 0.05 inches in size found in storm water runoff, as well as fine sand and larger particles and the pollutants attached to those particles. The CDS unit or equivalent BMPs is a non-mechanical self-operating system and will function when there is flow in the storm drainage system. Material captured in the CDS unit or equivalent BMPs separation chamber and sump is retained even when the unit's design capacity is exceeded.

The Sycamore Estates sub-project shall utilize continuous deflective separation units or other appropriate BMP measures at major parking areas associated with the multi-family residential development site, school site, institutional sites, and the park site. The Montecito sub-project is not required to use CDS units because no large parking areas are proposed.

- j. *Drainage Inlet Inserts.* This category of structural BMPs includes pre-manufactured media filters in troughs and containers within inlets and catch basins configured to remove sediment, pollutants adsorbed to sediment, and oil and grease. The Sycamore Estates and Montecito sub-projects shall utilize drainage inlet inserts only where other structural BMPs cannot be used prior to the storm water being discharged into MHPA areas. (For the purpose of this mitigation measure, “MHPA” refers to the MHPA limits as defined at the time of Project application and shown as “Existing MHPA Line” on Exhibit A.)
- k. *Other Measures.* The specific locations and implementation strategies for construction site erosion and sediment control practices shall be outlined in the sub-project Storm Water Pollution Prevention Plan (SWPPP). Typical construction site erosion and sediment control practices that can be applied during construction phases of the Sycamore Estates and Montecito sub-projects may include, but would not be limited to the following: 1) temporary sediment basins, 2) silt fences, 3) straw bale sediment traps, 4) storm drain inlet protection, 5) subsurface drains, 6) temporary slope drains, 7) grade stabilization structures, 8) storm drain outlet protection, 9) structural streambank protection, 10) temporary/permanent seeding, and 11) sodding/mulching.

Non-Structural/Housekeeping BMPs

Non-structural and housekeeping BMPs prevent and reduce the generation of pollutants at their source, as opposed to structural measures that are implemented to control pollutants after they are generated. The recommended non-structural BMPs include, but are not limited to the following:

- l. *CC&R Language.* Language shall be included in the Montecito and Sycamore Estates residential CC&Rs that encourages implementation of non-structural and housekeeping BMPs.
- m. *Educational Materials.* Educational materials shall be developed by the Montecito and Sycamore Estates sub-project applicants owners/permittees to educate homebuyers, developers, and construction personnel. Educational materials may also be provided to administrators of the proposed school and institutional sites. The educational materials shall provide information and general guidance on water quality control including, but not limited to, the non-structural BMPs mentioned here.
- n. *Catch Basin Stenciling.* “No Dumping – Drains to Ocean” or another equally effective phrase shall be posted on storm water inlets in order to alert the public to the ultimate destination of substances discharged into the storm water drainage system.
- o. *Other Methods.* Other non-structural measures may include fertilizer management programs, integrated pest management, litter control and street sweeping programs, and construction site erosion and sediment control practices.

- p. Other permanent BMPs, including alternative available technologies, approved by the ERM.
- 4.5-3: Prior to the issuance of grading permits and/or improvement permits for the Sycamore Estates sub-project, the following permanent post-construction structural BMPs shall be shown on the grading plans, improvement plans and/or erosion control landscaping plans, satisfactory to the ERM:
- a. Swales
 - b. Filter strips
 - c. Infiltration Basins and Percolation Trenches
 - d. Detention Controls
 - e. Other permanent BMPs or alternate available technologies, approved by the ERM.
- 4.5-4: Prior to the issuance of grading permits and/or improvement permits, the following notes, as a minimum, shall be included in the grading plans, improvement plans and/or erosion control landscaping plans, satisfactory to the ERM:
- a. The owner/permittee and/or contractor shall post the project SWPPP, with monitoring and maintenance updates after every storm event, on the job-site during all construction activities.
 - b. No grading shall be performed during the rainy season (November 15 through March 31) without the implementation of the special erosion control measures shown on this plan and approved by the ERM.
- 4.5-5: Prior to the issuance of building permits, the owner/permittee shall submit evidence, in the form of the annual certification required by the SWRCB, that the project is in compliance with the terms and conditions of the General Permit. This certification contains certification that the project is in compliance with the project SWPPP.
- 4.5-6: (Sycamore Estates Only) Prior to the issuance of building permits, the owner/permittee shall show the following permanent structural BMPs on the building plans to the satisfaction of the ERM:
- a. Continuous Deflective Separation (CDS) Units
 - b. Drainage Inlet Inserts
 - c. Other permanent BMPs or alternate available technologies approved by the ERM.
- 4.5-7: Prior to the issuance of building permits, the owner/permittee shall include, within the project CC&Rs, requirements for the private homeowner or property owner to permanently maintain appropriate post-construction BMPs to the satisfaction of the ERM.
- 4.5-8: The owner/permittee shall file a Notice of Termination with the SWRCB as required under the terms and conditions of the General Permit. A requirement for termination of coverage is the

submittal of a Post-Construction Storm Water Management Plan. The Plan must contain the permanent post-construction BMPs, and the party responsible for the permanent maintenance of each post-construction BMP. An additional requirement for termination of coverage is certification that the project complies with all local agency storm water discharge ordinances. The owner/permittee shall submit the Notice of Termination and the Post-Construction Storm Water Management Plan to the ERM along with any notice of acceptance from the SWRCB as certification that the project has complied with the terms and conditions of the General Permit and that coverage under the General Permit has been terminated.

4.5-9: Prior to issuance of building permits in Planning Area 1 of the Montecito sub-project site, a drainage interceptor separator shall be installed at the drainage outlet located adjacent to the MHPA. Installation and operation of the separator shall be verified by a City field inspector prior to the issuance of building permits in Planning Area 1. This separator system shall separate contaminated fine sediments, sands, petroleum products and other settleable/floatable contaminants. The system shall be maintained by the project's homeowners' association.

□ **Off-Site Gravity Sewer Design Option**

4.5-10: Construction shall adhere to NPDES Permit No. CA 0108758 and a National Pollutant Discharge Elimination System (NPDES) permit shall be obtained from the State Water Quality Control Board pursuant to the City of Poway Municipal Code, Chapter 13.09. Prior to the issuance of a construction permit for the sewer line, the City of Poway shall have on file proof that the applicant has filed a Notice of Intent (NOI) with the State.

4.6 TRANSPORTATION

KIMLEY-HORN AND ASSOCIATES (KHA) performed a traffic study of the *Rancho Encantada* project and presented its findings in a report titled “*Traffic Impact Analysis - Rancho Encantada*,” dated August 4, 2000. The traffic study, included as Appendix E of this document, has been prepared to determine and evaluate the potential traffic impacts on the local circulation system attributable to the proposed Project. This section is based on the analysis and conclusions of the traffic study.

The traffic study evaluates seven scenarios, including: 1) existing conditions; 2) opening day without project; 3) opening day with initial project (Montecito sub-project) only; 4) opening day with full project buildout; 5) year 2020 buildout without project; 6) year 2020 buildout with full project buildout; and 7) year 2020 buildout with full project plus the addition of military multi-family housing on MCAS Miramar. The reader should refer to Appendix E of this EIR for a complete analysis of each of these seven scenarios, which evaluates potential impacts to 54 intersections for each scenario (see Figure 4.6-1, *Intersection Identification Numbers*, for reference). For purposes of simplicity and organization within the EIR, Section 4.6.1 describes the existing conditions on area roadways and at area intersections. Section 4.6.2 summarizes the analysis and the significant impacts of the Project for scenarios 2 through 6. Section 4.6.3 discusses the significance of the impacts, and Section 4.6.4 describes the Mitigation, Monitoring and Reporting Program.

The study uses a traffic model to analyze the project traffic impacts by assigning project trips on the area roadway network. SANDAG maintains the regional traffic model that is used by local jurisdictions to forecast future traffic conditions on the regional transportation network. The regional model contains circulation element roadways, transit routes, and freeways for the entire region. In addition, the model includes General Plan land uses from each of the jurisdictions in the region. The model produces a Year 2020 travel forecast. In response to community concerns, the City of San Diego undertook a major effort to ~~calibrate~~ refine the SANDAG model to accurately represent the future transportation network and future land uses. In addition, the City of Poway provided land use and network inputs to the City of San Diego in order to ensure that the model reflected the most up-to-date information with respect to planned development in Poway. Year 2020 forecast volumes on state highways were supplied by the California Department of Transportation (Caltrans).

4.6.1 EXISTING CONDITIONS

□ EXISTING CIRCULATION SYSTEM

Rancho Encantada is bordered on the north by the City of Poway and on the west by the City of San Diego communities of Scripps Miramar Ranch and Miramar Ranch North. Undeveloped land that is part of the Sycamore Canyon County Open Space Preserve lies to the east and to the south is the United States Marine Corps Air Station (MCAS) Miramar. The project site is located approximately two miles east of Interstate 15 (I-15). There are mostly dirt roads that traverse the project site, except for a few paved roads that lead to the existing industrial use areas on the Sycamore Estates sub-project site and to the SDG&E easement located on the Montecito sub-project site. The following is a brief description of the existing roadway system in the project area that provides primary access to the site. Other nearby roads are identified in Appendix C of Technical Appendix E.

Interstate 15 (I-15) is an interstate freeway traversing San Diego County in a north/south direction. I-15 is located approximately two miles to the west of the project site. The Express Lanes on I-15 provide two additional lanes in the peak hour direction during commute hours.

Pomerado Road provides direct access to the project site and is generally a north/south oriented roadway abutting the west boundary of the project site. This roadway connects to I-15 at Miramar Road and travels northeast to Spring Canyon Road as a two-lane collector street. The street turns to the right at Spring Canyon Road and is classified and built as a four-lane street for approximately 500-feet, to accommodate the large turning volumes at this intersection. It then continues as a two-lane street past the project site to the south of Creek Road. Existing average daily traffic (ADT) volumes on Pomerado Road in the vicinity of the project site range from approximately 9,400 to 29,500 ADT. The City of San Diego, at the recommendation of the Scripps Ranch Community Planning Group, reclassified Pomerado Road from a four-lane major road to its current two-lane configuration. This reclassification was approved with the understanding that the projected traffic volumes for the two-lane road would exceed the design capacity of the roadway, causing congestion at four intersections.

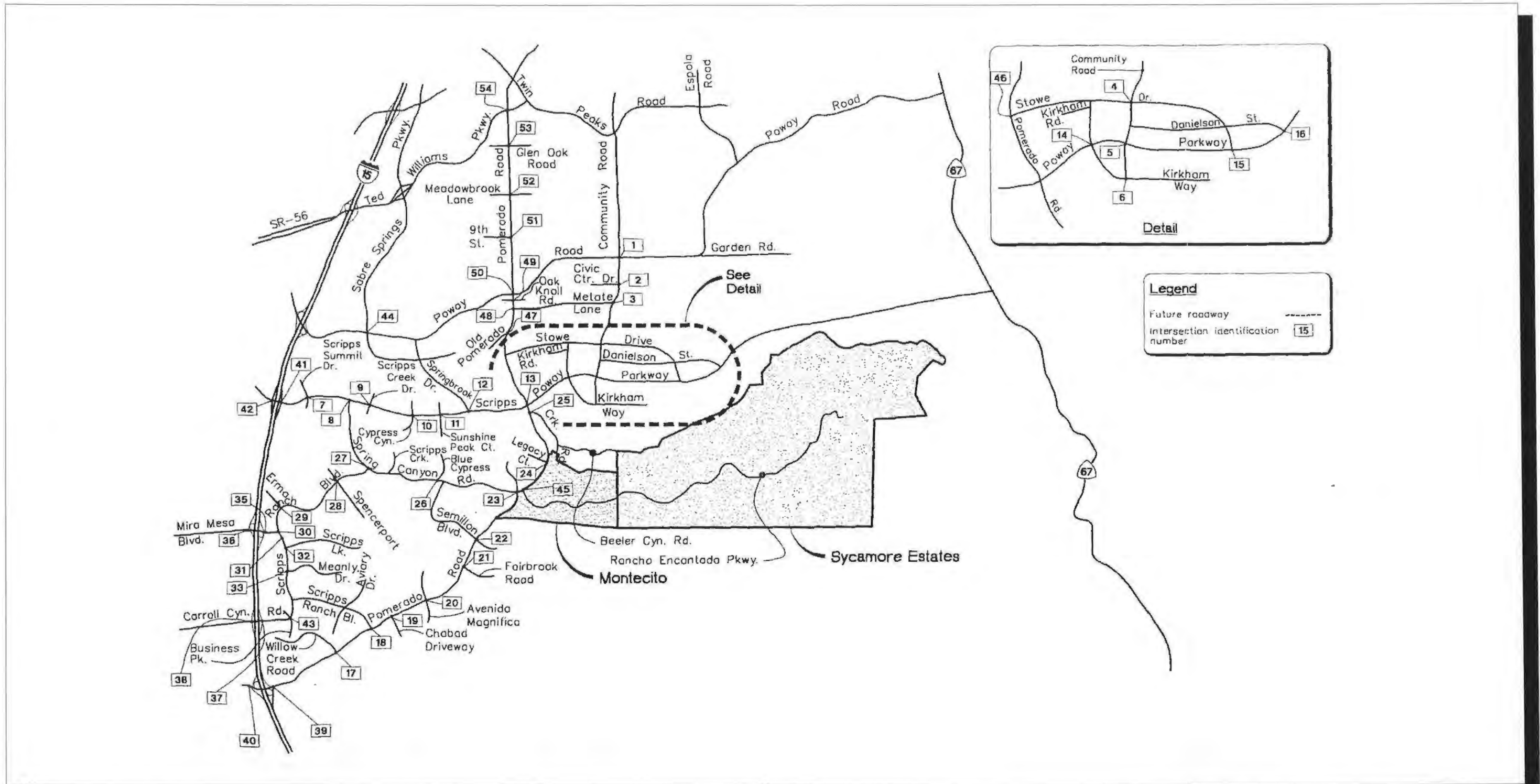
Beeler Canyon Road is located adjacent to the northern boundary of the Precise Plan area and serves as a secondary entry to the Sycamore Estates sub-project site. Beeler Canyon Road connects to Pomerado Road to the east of the project site. Beeler Canyon Road transitions into Creek Road near the southeastern project boundary.

Scripps Poway Parkway is located to the north of the project site and runs parallel with Beeler Canyon Road.

□ LEVEL OF SERVICE STANDARD

Level of Service (LOS) is a professional industry standard by which to measure the operating conditions of a given roadway segment or intersection. Level of service is defined on a scale of A to F, where LOS A represents free flowing traffic conditions with no restrictions on maneuvering or operating speeds, low traffic volumes and high speeds; LOS B represents stable flow, more restrictions, operating speeds beginning to be affected by traffic volumes; LOS C represents stable flow, more restrictions, speed and maneuverability more closely controlled by higher traffic volumes; LOS D represents conditions approaching unstable flow, traffic volumes profoundly affect arterials; LOS E represents unstable flow, and some stoppages; and LOS F represents forced flow, many stoppages, and low operating speeds. According to the City of San Diego's significance criteria, "*in most instances LOS D and better is considered to be an acceptable level of service.*"

Signalized intersections are further analyzed by determining the average delay per vehicle entering the intersection. The delay is determined using a computer program which utilizes the methodology found in Chapter 9 of the 1994 Highway Capacity Manual (HCM). The delay values (seconds) are qualified by assigning a Level of Service or the corresponding delay values for the intersection as a whole.



SOURCE: KIMLEY-HORN and ASSOCIATES

Figure 4.6-1
INTERSECTION IDENTIFICATION NUMBERS



□ EXISTING TRAFFIC VOLUMES

Figure 4.6-2, *Existing Traffic Volumes*, depicts the existing ADT volumes for roadway segments morning and evening peak hour traffic volumes for roadways and intersections in the vicinity of the project site. Table 4.6-1, *Existing Daily Traffic Volumes*, and Table 4.6-2, *Existing Intersection Operation*, present the existing roadway and intersection conditions in the vicinity of the project site. These tables present a summary of the most recent available daily traffic volumes (ADTs) from the City of San Diego count records and the results of manual AM/PM peak hour turning movement counts conducted by KHA on July 1999 and February-April 2000. The existing heavy peak hour traffic on Pomerado Road and Scripps Poway Parkway affect most of the streets and intersections in the project area. Intersection locations are shown on Figure 4.6-1.

Figure 4.6-1, presents existing ADT volumes. The existing ADT's were compared to corresponding City of San Diego LOS thresholds for the appropriate roadway classifications. Table 4.6-1 presents the results of this comparison. As shown in this table, all study area street segments are characterized by acceptable LOS D or better conditions under the existing conditions, with the exception of six Pomerado Road segments which operate at LOS F:

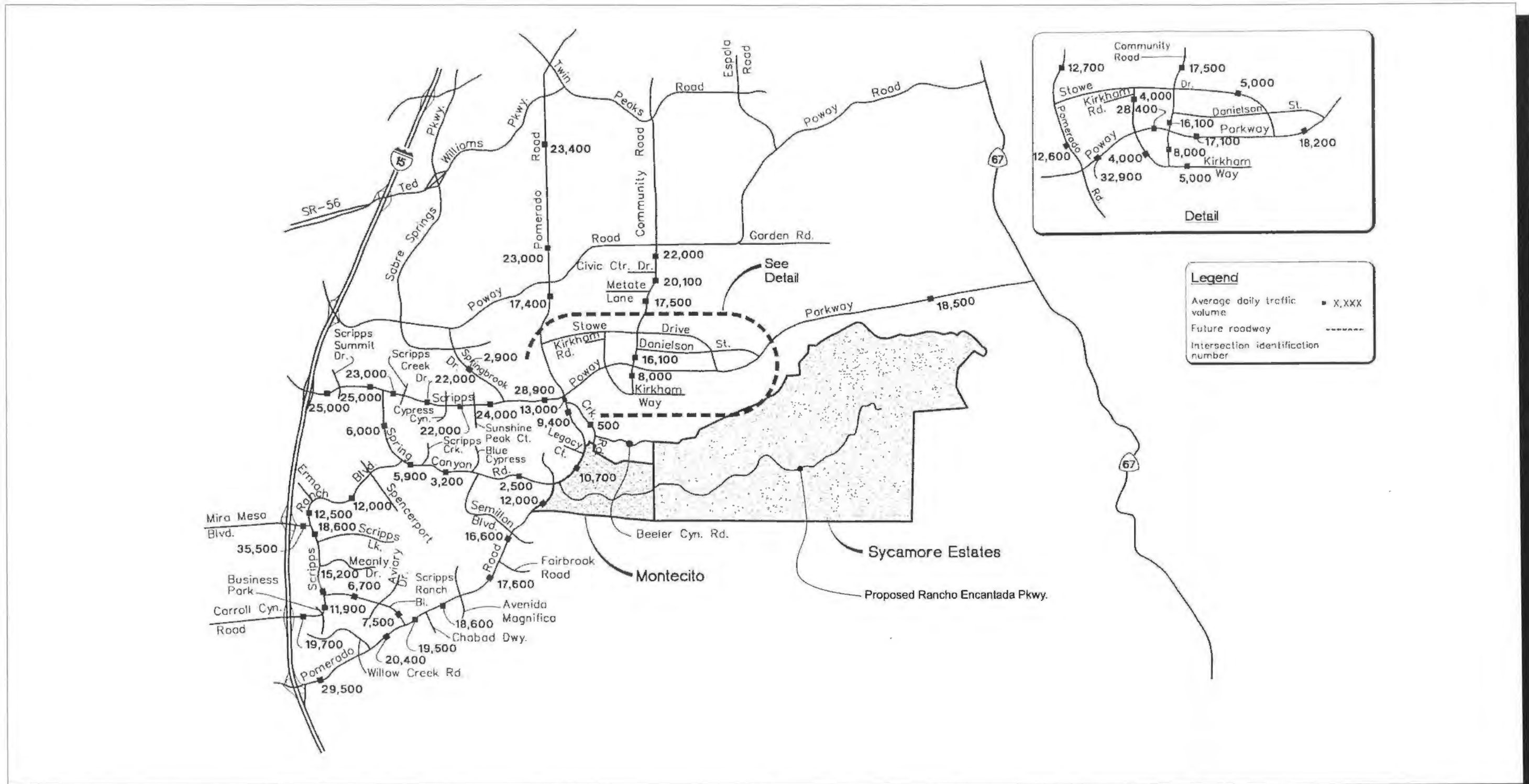
- I-15 to Willow Creek Road
- Willow Creek Road to Scripps Ranch Boulevard
- Scripps Ranch Boulevard to Chabad Court
- Chabad Court to Avenida Magnifica
- Avenida Magnifica to Fairbrook Road
- Fairbrook Road to Semillon Boulevard

□ EXISTING INTERSECTION OPERATION

While roadway levels of service based on daily traffic volumes are useful in describing traffic operating conditions, roadway performance is most often controlled by the performance of intersections, and more specifically, intersection performance during peak traffic periods. This is because traffic control at intersections interrupts traffic flow, which would otherwise be relatively unimpeded (except for the influences of on-street parking, access to adjacent uses or other factors, which result in interaction among vehicles between controlled intersections). Table 4.6-2, *Existing Intersection Operation*, shows the delay and LOS of the existing conditions at each intersection in the *Rancho Encantada* project area.

The following four intersections are operating at an unacceptable level of service at peak hours, under existing conditions:

- Pomerado Road/Willow Creek Road (LOS F, AM and PM peak hours)
- Pomerado Road/Scripps Ranch Boulevard (LOS F, AM and PM peak hours)
- Scripps Ranch Boulevard/Mira Mesa Boulevard (LOS E, AM peak hour)
- Carroll Canyon Road/I-15 SB Off Ramp (LOS E, AM peak hour)



SOURCE: KIMLEY-HORN and ASSOCIATES

Figure 4.6-2
EXISTING TRAFFIC VOLUMES



Table 4.6-1
EXISTING DAILY TRAFFIC VOLUMES

STREET	SEGMENT	STREET CLASSIFICATION	DAILY TRAFFIC VOLUME	CAPACITY AT LOS E	VOLUME TO CAPACITY (V/C)	DAILY SEGMENT LOS
SCRIPPS POWAY PARKWAY	I-15 TO SCRIPPS SUMMIT DR.	6 LN PRIMARY ARTERIAL	25000	60000	0.42	A
	SCRIPPS SUMMIT DR. TO SPRING CANYON RD.	6 LN PRIMARY ARTERIAL	25000	60000	0.42	A
	SPRING CANYON TO SCRIPPS CREEK DR.	4 LN MAJOR ARTERIAL	23000	40000	0.58	C
	SCRIPPS CREEK DR. TO CYPRESS CYN. RD.	4 LN PRIMARY ARTERIAL	22000	45000	0.49	B
	CYPRESS CYN. RD. TO SUNSHINE PEAK	4 LN PRIMARY ARTERIAL	22000	45000	0.49	B
	SUNSHINE PEAK TO SPRINGBROOK DR.	4 LN PRIMARY ARTERIAL	24000	45000	0.53	B
	SPRING BROOK DR. TO POMERADO RD.	6 LN PRIMARY ARTERIAL	28900	60000	0.48	B
	POMERADO RD. TO KIRKHAM RD.	6 LN PRIMARY ARTERIAL	32900	60000	0.55	B
	KIRKHAM RD. TO COMMUNITY RD.	6 LN PRIMARY ARTERIAL	28400	60000	0.47	B
	COMMUNITY RD. TO STOWE DR.	6 LN PRIMARY ARTERIAL	17100	60000	0.28	A
	STOWE DR. TO DANIELSON ST.	6 LN PRIMARY ARTERIAL	18200	60000	0.30	A
DANIELSON ST. TO SR 67	6 LN PRIMARY ARTERIAL	18500	60000	0.31	A	
POMERADO ROAD	I-15 TO WILLOW CREEK RD.	2 LANE COLLECTOR	29500	15000	1.97	F
	WILLOW CRK. RD. TO SCRIPPS RANCH BLVD.	2 LANE COLLECTOR	20400	15000	1.36	F
	SCRIPPS RANCH BLVD. TO CHABAD CT.	2 LANE COLLECTOR	18500	15000	1.30	F
	CHABAD CT. TO AVENIDA MAGNIFICA	2 LANE COLLECTOR	18600	15000	1.24	F
	AVENIDA MAGNIFICA TO FAIRBROOK RD.	2 LANE COLLECTOR	17600	15000	1.17	F
	FAIRBROOK RD. TO SEMILLON BLVD.	2 LANE COLLECTOR	16600	15000	1.11	F
	SEMILLON BLVD. TO SPRING CYN. RD.	2 LANE COLLECTOR	12000	15000	0.80	D
	SPRING CYN. RD. TO LEGACY PT.	2 LANE COLLECTOR	10700	15000	0.71	D
	LEGACY PT. TO TREADWELL CREEK RD.	2 LANE COLLECTOR	8400	15000	0.63	C
	TREADWELL CRK. RD. TO SCRIPPS PWY PKWY.	4 LN MAJOR ARTERIAL	13000	40000	0.33	A
	SCRIPPS PWY PKWY. TO STOWE DRIVE	4 LN MAJOR ARTERIAL	12600	40000	0.32	A
	STOWE DR. TO METATE LANE	4 LN MAJOR ARTERIAL	12700	40000	0.32	A
	METATE LANE TO POWAY RD.	4 LN MAJOR ARTERIAL	17400	40000	0.44	B
	POWAY RD. TO ROBISON BLVD.	4 LN MAJOR ARTERIAL	23000	40000	0.58	C
	ROBISON BLVD. TO TED WILLIAMS PKWY.	4 LN MAJOR ARTERIAL	23400	40000	0.59	C
COMMUNITY ROAD	POWAY RD. TO CIVIC CENTER DR.	4 LN MAJOR ARTERIAL	22000	40000	0.65	C
	CIVIC CENTER DR. TO METATE LANE	4 LN MAJOR ARTERIAL	20100	40000	0.50	B
	METATE LANE TO STOWE DR.	4 LN MAJOR ARTERIAL	17600	40000	0.44	B
	STOWE DR. TO SCRIPPS POWAY PKWY.	4 LN MAJOR ARTERIAL	16100	40000	0.40	B
	SCRIPPS POWAY PKWY. TO KIRKHAM WAY	4 LN COLLECTOR (a)	8000	30000	0.27	B
MIRA MESA BOULEVARD	I-15 TO SCRIPPS RANCH BLVD.	6 LN MAJOR ARTERIAL	35500	50000	0.71	C
SCRIPPS RANCH BOULEVARD	SPRING CANYON RD. TO ERMA RD.	4 LN MAJOR ARTERIAL	12000	40000	0.30	A
	ERMA RD. TO MIRA MESA BLVD.	4 LN MAJOR ARTERIAL	12500	40000	0.31	A
	MIRA MESA BLVD. TO SCRIPPS LAKE DR.	4 LN MAJOR ARTERIAL	14600	40000	0.47	B
	SCRIPPS LAKE DR. TO CARROLL CANYON RD.	4 LN MAJOR ARTERIAL	12000	40000	0.30	A
	CARROLL CANYON RD. TO AVIARY DR.	4 LN MAJOR ARTERIAL	8700	40000	0.17	A
	AVIARY DR. TO POMERADO RD.	4 LN MAJOR ARTERIAL	7500	40000	0.19	A
SPRING CANYON ROAD	SCRIPPS POWAY PKWY. TO SCRIPPS CREEK RD.	4 LN COLLECTOR (a)	6000	30000	0.20	A
	SCRIPPS CREEK RD. TO SEMILLON BLVD.	4 LN COLLECTOR (a)	3200	30000	0.11	A
	SEMILLON BLVD. TO POMERADO RD.	4 LN COLLECTOR (a)	2500	30000	0.08	A
CARROLL CANYON ROAD	SCRIPPS RANCH BLVD. TO BUSINESS PARK AVE.	4 LN COLLECTOR (a)	11900	30000	0.40	C
	BUSINESS PARK AVE. TO I-15	4 LN COLLECTOR (a)	19700	30000	0.66	C
SPRINGBROOK DRIVE	SABRE SPRINGS PKWY. TO SCRIPPS POWAY PKWY.	2 LANE COLLECTOR	2900	15000	0.19	A
CREEK ROAD	WEST OF BEELER CANYON	2 LANE COLLECTOR	600	8000	0.08	A

(a) With two-way left turn lane

Table 4.6-2
EXISTING INTERSECTION OPERATION

INTERSECTION	SIGNALIZED INTERSECTIONS			
	AM PEAK HOUR		PM PEAK HOUR	
	DELAY (a)	LOS (b)	DELAY (a)	LOS (b)
1. Poway Road/Community Road	13.4	B	16.6	C
2. Civic Center Drive/Community Road	16.8	C	18.9	C
3. Melale Lane/Community Road	8.0	B	9.2	B
4. Slows Drive/Community Road	12.8	B	14.6	B
5. Scripps Poway Parkway/Community Road	12.6	B	16.9	C
7. Scripps Poway Parkway/Scripps Summit Road	5.4	B	9.1	B
6. Scripps Poway Parkway/Spring Canyon Road	18.2	C	17.8	C
9. Scripps Poway Parkway/Scripps Creek Drive	15.6	C	13.6	B
10. Scripps Poway Parkway/Cypress Canyon Road	12.5	B	11.0	B
11. Scripps Poway Parkway/Sunshine Peak	7.7	B	8.3	B
12. Scripps Poway Parkway/Springbrook Drive	16.8	C	17.5	C
13. Scripps Poway Parkway/Pomerado Road	18.0	C	21.0	C
14. Scripps Poway Parkway/Kirkham Road	18.0	C	8.9	B
15. Scripps Poway Parkway/Slows Drive	10.0	B	9.5	B
16. Scripps Poway Parkway/Danielson Street	10.2	B	7.9	B
17. Pomerado Road/Willow Creek	-	F	-	F
18. Pomerado Road/Scripps Ranch Boulevard	-	F	-	F
19. Pomerado Road/Chabad Court	8.7	B	7.4	B
20. Pomerado Road/Avenidas Magnifica	11.4	B	17.5	C
21. Pomerado Road/Fairbrook Road	6.1	B	9.6	B
22. Pomerado Road/Semillon Boulevard	9.4	B	11.4	B
23. Spring Canyon/Pomerado Road	13.9	B	17.4	C
24. Pomerado Road/Legacy Point	7.5	B	11.4	B
25. Pomerado Road/Creek Road	17.5	C	11.2	B
26. Spring Canyon Road/Blue Cypress Drive	14.9	B	5.7	B
27. Scripps Ranch Boulevard/Spring Canyon Road	18.5	C	8.4	B
28. Scripps Ranch Boulevard/Farmingdale	10.7	B	9.0	B
29. Scripps Ranch Boulevard/Enna Road	18.7	C	11.7	B
30. Scripps Ranch Boulevard/Mira Mesa Boulevard	58.4	E	12.2	B
31. Scripps Ranch Boulevard/Hibert Road	12.8	B	21.6	C
32. Scripps Ranch Boulevard/Scripps Lake Drive	20.7	C	18.6	C
33. Scripps Ranch Boulevard/Meanly Drive	10.1	B	14.1	B
34. Scripps Ranch Boulevard/Scripps Ranch Court	16.7	C	15.4	C
35. Mira Mesa Boulevard/I-15 NB Off Ramp	14.1	B	29.4	D
36. Mira Mesa Boulevard/I-15 SB Off Ramp	24.2	C	13.6	B
37. Carroll Canyon Road/I-15 NB Off Ramp	35.0	D	14.4	B
38. Carroll Canyon Road/I-15 SB Off Ramp	52.1	E	37.9	D
39. Pomerado Road/I-15 NB Off Ramp	10.4	B	9.0	B
40. Pomerado Road/I-15 SB Off Ramp	28.3	D	10.0	B
41. Scripps Poway Parkway/I-15 NB Off Ramp	25.5	D	22.6	C
42. Scripps Poway Parkway/I-15 SB Off Ramp	13.1	B	19.3	C
43. Carroll Canyon Road/Business Park	14.7	B	17.9	C
44. Poway Road/Sabre Springs Parkway	17.2	C	21.4	C
46. Pomerado Road/Slows Drive	9.2	B	8.4	B
47. Pomerado Road/Old Pomerado Road	10.3	B	10.1	B
48. Pomerado Road/Melale Lane	10.6	B	9.1	B
49. Pomerado Road/Oak Knoll Road	11.9	B	12.6	B
50. Pomerado Road/Poway Road	15.4	C	20.0	C
51. Pomerado Road/9th Street	12.4	B	7.1	B
52. Pomerado Road/Meadowbrook Lane	12.5	B	7.1	B
53. Pomerado Road/Glen Oak Road	8.9	B	8.9	B
54. Pomerado Road/Ted Williams Parkway	13.8	B	15.5	C

(a) Average stopped delay per vehicle, in seconds
(b) Level of service determined using Highway Capacity Manual, Chapter 9 & 10 procedures
- Critical V/C exceeds 1/PHF or 1.2; calculation of delay not feasible

❑ CONGESTION MANAGEMENT PLAN OPERATIONS

Implementation of the Congestion Management Program (CMP) in San Diego County requires enhanced capacity analysis for all facilities comprising the CMP and Regionally Significant Arterial (RSA) network which are impacted by large projects. A large project is defined as generating at least 2,400 daily trips or 200 peak hour trips. CMP and RSA arterials are potentially impacted, and enhanced capacity analysis is triggered, when the project adds 50 directional peak hour trips to street segments and intersections and/or 150 directional peak hour trips to freeway mainlines. Trip generation of the Montecito sub-project, the Sycamore Estates sub-projects and the *Rancho Encantada* Precise Plan as a whole meet the CMP “large project” definition, and as such are subject to a CMP analysis.

Scripps Poway Parkway and Pomerado Road are RSAs in the immediate project vicinity. The assignment of Project traffic from the select zone run of the City of San Diego’s model (based on Poway land use inputs) would result in CMP-required arterial analysis on the Scripps Poway Parkway segment from I-15 to Pomerado Road. On Pomerado Road, enhanced capacity analysis is required between I-15 and Ted Williams Parkway. Included in this section, is the enhanced capacity analysis required by the CMP. For the purposes of this analysis, Pomerado Road was divided into two sections. The first section is from I-15 to Treadwell Road/Creek Road, located mostly in the City of San Diego and south of the project site, and the second section extends from Treadwell Road/Creek Road to Ted Williams Parkway in the City of Poway north of the project site. Table 4.6-3, *Existing CMP Arterials*, summarizes the results of the existing CMP analysis for these street segments. As shown, these segments are characterized by good LOS C or better conditions in both directions of travel.

**Table 4.6-3
EXISTING CMP ARTERIALS**

STREET SEGMENT		DIRECTION	AM PEAK HOUR		PM PEAK HOUR	
			LOS	SPEED	LOS	SPEED
Scripps Poway Pkwy I-15 to Pomerado Rd		Eastbound	A	37.4	A	35.5
		Westbound	A	37.5	A	36.0
Pomerado Road I-15 to Treadwell Rd		Eastbound	A	36.7	C	24.1
		Westbound	B	32.3	B	33.4
Treadwell Rd to Ted Williams Pkwy		Northbound	B	29.2	B	28.0
		Southbound	B	27.8	B	30.4

Source: Kimley-Horn and Associates, June 1, 2000

EXISTING RAMP METER ANALYSIS

Ramp metering is a means of controlling the volume of traffic entering the freeway with the goal of improving the traffic operations and flow on the freeway. Ramp meter analysis estimates the peak hour queues and delays at freeway ramps by comparing existing volumes to the meter rate at a given location. The excess demand forms the basis for calculating the maximum queues and maximum delays anticipated at each location. Table 4.6-4, *Existing Ramp Meter Analysis*, summarizes the existing ramp meter conditions at freeway ramps near the project site assuming existing meter rates.

The ramp meter analysis determined that the demand exceeds the flow rate three northbound ramps and four southbound ramps, shown with a numeric value in the "Excess Demand" column of Table 4.6-4.

Table 4.6-4
EXISTING RAMP METER ANALYSIS

ASSUMING CALTRANS FLOW RATE							
LOCATION	PEAK	DEMAND D	FLOW F	EXCESS DEMAND E	MAX DELAY (MIN)	OBSERVED DELAY (s)	MAX QUEUE Q (m)
I-15 SCRIPPS POWAY PARKWAY (NB)	AM	904	436	468	64		4,212
	PM	443	436	7	1		63
I-15 NB MIRA MESA BOULEVARD (EB)	AM	782	396	386	58		3,474
	PM	1,113	396	717	109		6,453
I-15 NB MIRA MESA BOULEVARD (WB)	AM	319	420	0	0		0
	PM	800	420	380	54		3,420
I-15 NB CARROLL CANYON ROAD	AM	296	910	0	0		0
	PM	693	910	0	0		0
I-15 NB MIRAMAR ROAD/POMERADO ROAD	AM	512	1,382	0	0		0
	PM	1,279	1,382	0	0		0
I-15 SCRIPPS POWAY PARKWAY (SB)	AM	1,079	804	275	21	14.1	2,475
	PM	1,320	804	516	39		4,644
I-15 SB MIRA MESA BOULEVARD (EB)	AM	1,541	977	564	35		5,076
	PM	960	977	0	0		0
I-15 SB MIRA MESA BOULEVARD (WB)	AM	757	403	354	53	9.6	3,186
	PM	587	403	184	27		1,556
I-15 SB CARROLL CANYON ROAD	AM	1,268	1,180	88	4	6.0	792
	PM	1,107	1,180	0	0		0
I-15 WB TO SB MIRAMAR ROAD/POMERADO ROAD	AM	1,151	1,152	0	0		0
	PM	651	1,152	0	0		0
I-15 EB TO SB MIRAMAR ROAD/POMERADO ROAD	AM	599	604	0	0	1.7	0
	PM	1,531	604	927	92		8,343

ASSUMING UNIFORM 15-MINUTE MAXIMUM DELAYS

□ FREEWAY SEGMENT ANALYSIS

Freeway segments were analyzed in accordance with standard Caltrans methodologies. In order to estimate peak hour directional volumes based on daily numbers, peak hour percentages (k factors), directional splits (d factors), and truck percentages were assembled from Caltrans for the nearest available count station. The estimated peak hour volume was then compared to the peak hour capacity and the resulting volume-to-capacity ratio was reviewed against Caltrans thresholds. Table 4.6-5 summarizes the findings of existing freeway segment analysis. The freeway segments include I-15 from Miramar Way to State Route 56. As shown in this table, the I-15 segments between Miramar Way and State Route 56 are characterized by congested LOS F conditions. It should be noted that Caltrans has indicated that the volumes they provided for this analysis do not incorporate the existing managed lanes on I-15; volumes on these facilities are currently being prepared by San Diego Association of Governments (SANDAG) and are not yet available. Because the provided volumes reflect a worst case scenario (i.e., all traffic is grouped into the general purpose lanes whether or not they would instead use the managed lanes), and in the absence of the SANDAG data, the analysis is based on the Caltrans supplied numbers.

**Table 4.6-5
EXISTING FREEWAY SEGMENT ANALYSIS**

ROUTE	LIMITS	# LANES	CAPACITY	ADT	PEAK HOUR %	DIRECTION SPLIT	TRUCK TERRAIN FACTOR	PEAK HOUR VOLUME	V/C	LEVEL OF SERVICE
Interstate 15	SR-56 - Poway Road	4 +HOV	9,200	202,000	7.9%	55.0%	0.920	8,586	0.93	E
	Poway Road - Scripps Poway Parkway/Mercy Road	4 +HOV	9,200	223,000	7.9%	56.0%	0.920	9,651	1.05	F(0)
	Scripps Poway Parkway/Mercy Road - Mira Mesa Boulevard	4 +HOV	9,200	243,200	7.9%	56.0%	0.920	10,525	1.14	F(0)
	Mira Mesa Boulevard - Carroll Canyon Road	4 +HOV	9,200	247,400	7.7%	57.0%	0.955	10,233	1.11	F(0)
	Carroll Canyon Road - Pomerado Road	5 +HOV	11,500	255,900	7.4%	55.0%	0.955	9,815	0.85	D
	Pomerado Road to Miramar Way	5 +HOV	11,500	273,400	7.8%	55.0%	0.955	11,053	0.96	E
	Miramar Way to SR163	5 +HOV	11,500	276,600	7.8%	52.0%	0.985	10,251	0.89	D

Lanes - Number of lanes in one direction: HOV - High Occupancy Lanes
 Capacity - Capacity in one direction
 ADT - Average Daily Traffic
 Peak Hour % - Percentage of average daily traffic occurring during the peak hour
 Direction Split - Percentage of peak hour traffic travelling in peak direction
 Truck Factor - Truck/terrain factor to represent influence of heavy vehicles and/or grades
 Peak Hour Volume - Peak hour traffic in peak direction of travel / For facilities with HOV lanes, ten percent is assumed to use HOV lanes.
 V/C - Volume to Capacity ratio
 LOS - Caltrans District 11 procedure was used to estimate the freeway level of service. Designations vary from A to F, with four levels of LOS F from F(0) to F(3).

4.6.2 IMPACT ANALYSIS

Issue 1: *What direct and/or cumulative traffic impacts would the project have on the existing and planned community and regional circulation networks?*

Significance Criteria

The proposed Project would have significant traffic impact if its traffic generation would exceed the following thresholds:

- a. If any intersection or roadway segment affected by a project would operate at LOS E or F under either direct or cumulative conditions, the impact would be significant if the project exceeds the following allowable increases in delay or intersection capacity utilization (ICU) for affected intersection or volume-to-capacity (V/C) ratio or speed for affected roadway segments:

LEVEL OF SERVICE WITH PROJECT	ALLOWABLE INCREASE DUE TO PROJECT IMPACTS ¹			
	INTERSECTIONS		ROADWAY SECTIONS	
	Delay (sec.)	ICU (V/C)	V/C	Speed (mph)
E ²	2	0.02	0.02	1
F ²	2	0.02	0.02	1

¹ If a proposed project's traffic impacts exceed the values shown in the table, then the impacts are deemed "significant." The project applicant shall identify "feasible mitigations" to achieve LOS D or better.

² The acceptable level of service (LOS) standard for roadways and intersections in San Diego is LOS D. However, for undeveloped locations, the goal is to achieve LOS C.

- b. If a project would add a substantial amount of traffic to a congested freeway segment, interchange, or ramp.
- c. If a project would increase traffic hazards to motor vehicles, bicyclists or pedestrians due to proposed non-standard design features (e.g., poor sight distance, proposed driveway onto an access-restricted roadway).
- d. If a project would result in the construction of a roadway which is inconsistent with the General Plan, and if the proposed roadway would not properly align with other existing or planned roadways.
- e. If a project would result in a substantial restriction in access to publicly or privately owned land.

Additional factors to consider when determining traffic impacts are the volume of traffic the project contributes to a transportation facility as compared to the City of San Diego's *Traffic Impact Study*

Manual (1998) table, shown below as Table 4.6-6, *Significant Transportation Threshold Criteria*.

**Table 4.6-6
SIGNIFICANT TRANSPORTATION THRESHOLD CRITERIA**

LEVEL OF SERVICE WITH PROJECT	ALLOWABLE INCREASE DUE TO PROJECT IMPACTS		
	INTERSECTIONS	ROADWAY SECTIONS	
	Delay (Seconds) ¹	V/C ²	Speed (MPH)
A	N/A	0.10	5
B	6	0.06	3
C	4	0.04	2
D ³	2	0.02	1
E	2	0.02	1
F	2	0.02	1

1. Delay=average stopped delay per vehicle measured in seconds.
2. V/C= Volume to Capacity Ratio (Capacity at LOS E should be used)
3. The acceptable Level of Service (LOS) standard for roadways and intersections in San Diego is LOS D.

If the project impacts are within the Table 4.6-6 thresholds and the resulting LOS is A, B, C or D, then the impacts are not significant and mitigation is not required.

If the project impacts are within the Table 4.6-6 thresholds but the resulting level of service is E or F, then the impacts are cumulatively significant. Mitigation is recommended, but not required.

If the project impacts exceed the Table 4.6-6 thresholds and the resulting LOS is A, B, C, or D, then the impacts are cumulative, but not significant. Mitigation is not required.

If the project impacts exceed the Table 4.6-6 thresholds and the addition of project traffic would decrease an existing level of service from LOS D or better to a resulting LOS of E or F, then the impacts are direct and cumulatively significant. Mitigation is required.

If the project impacts exceed the Table 4.6-6 thresholds and the addition of project traffic would contribute to an existing LOS of E or F, then the impacts are direct and cumulatively significant. Mitigation is required.

Impact Analysis

PROJECT TRAFFIC GENERATION

The Project's access opportunities based on the existing street network are from the north via existing Beeler Canyon Road/Creek Road and from the west on Pomerado Road just north of Spring Canyon Road. Rancho Encantada Parkway, a proposed roadway, is proposed to be constructed to provide access to Pomerado Road from within the project site.

Rancho Encantada Parkway would be built along the southern portion of the project site, forming a “T” intersection south of Legacy Point on Pomerado Road. Given the layout of the site and the local/regional orientation of Project traffic, it would be expected that the bulk of the project trips would load from the west via this new roadway. Accordingly, the majority of project traffic would be added to City of San Diego streets. This study assumes that the Beeler Canyon access to the north would remain with limited traffic contribution by the proposed Project, but that the primary Project access would be Rancho Encantada Parkway. Also, given the mixture of Project land uses, it is likely that there would be interaction between Project land uses (e.g., between residences and school and park, etc.).

The *Rancho Encantada* project proposes the construction of a predominantly residential project. The project would consist of an open space preserve, 837 single family dwelling units, 106 multiple family dwelling units, two institutional sites and a neighborhood park and school. Table 4.6-7, *Project Trip Generation*, shows the intensity and trip generation rates from implementation of the proposed Project. As shown by this table, the Project is expected to generate approximately 10,548 ADT. The single-family residential uses in the Montecito and Sycamore Estates sub-projects are expected to generate the highest trips with 2,760 and 5,660 ADTs, respectively. However, some of the uses within the Precise Plan area are support uses that will generate trips within the development, such as residential trips to/from the proposed school and park sites. The traffic model’s select zone assignment process was used to determine the internal interaction. After considering the internal interaction among project land uses, the resulting external traffic is about 9,808 ADT, with about 826 trips generated in the morning peak hour and 953 trips generated in the afternoon peak hour (see Table 4.6-7).

□ PROJECT TRAFFIC DISTRIBUTION AND ASSIGNMENT

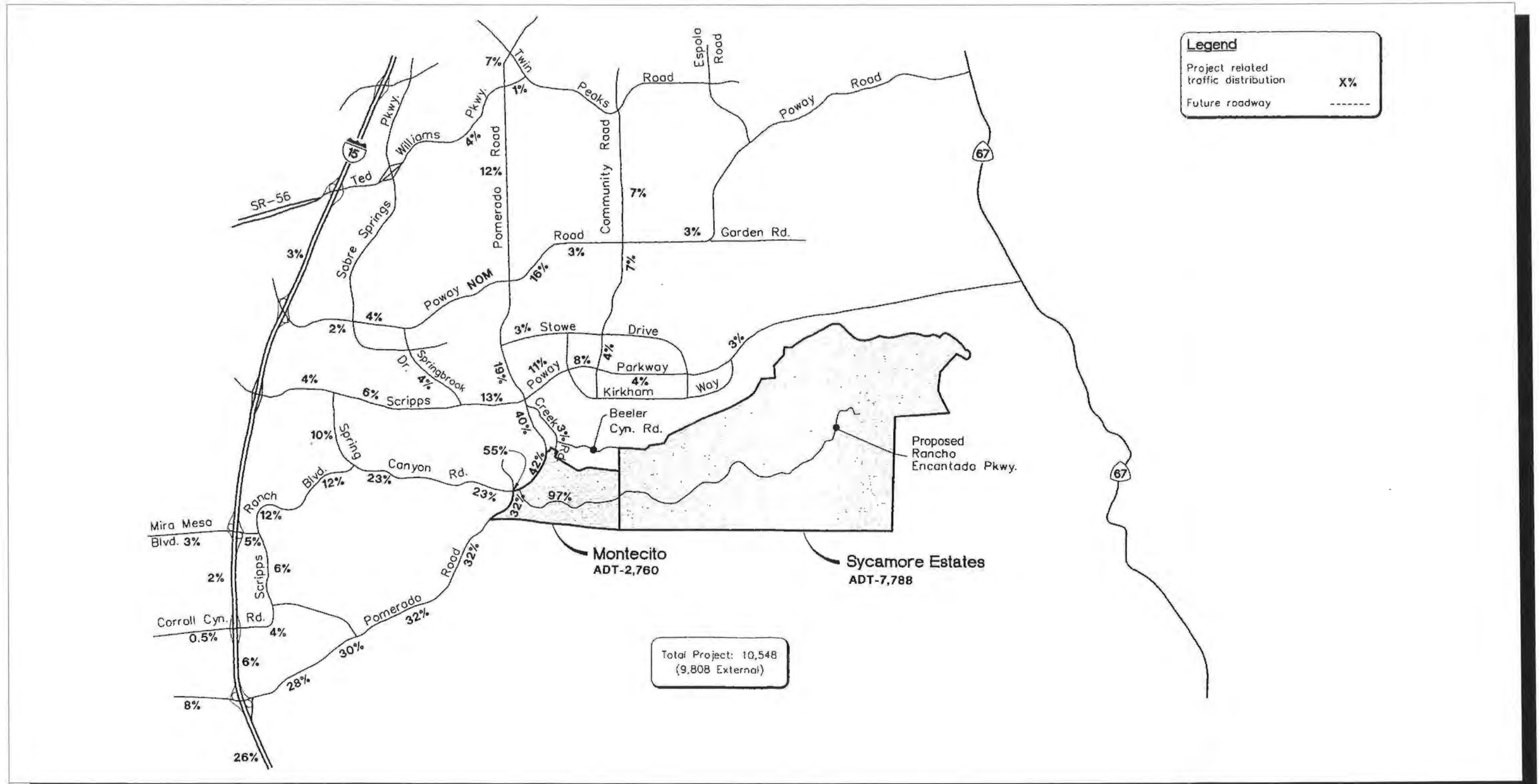
The Project-generated traffic was distributed to the street system based on a Select Zone Assignment obtained from the San Diego Association of Governments (SANDAG) Series 9 Forecast. Once the traffic distribution was established, the Project-generated traffic was assigned to the adjacent street system. Figure 4.6-3, *Project Traffic Distribution*, shows the assignment of project trips on the area roadway network. (Figures showing the distribution of Montecito-only traffic and Sycamore Estates-only traffic are included in traffic study attached as Appendix E to this EIR.)

To determine the Project’s traffic distribution on the surrounding transportation network, a regional traffic model was developed to reflect this Project and its proposed access. SANDAG maintains the regional traffic model that is used by local jurisdictions to forecast future traffic conditions on the regional transportation network. The regional model contains circulation element roadways, transit routes, and freeways for the entire region. In addition, the model includes General Plan land uses from each of the jurisdictions in the region. The model produces a Year 2020 travel forecast. In response to community concerns, the City of San Diego undertook a major effort to calibrate refine the SANDAG model to accurately represent the future transportation network and future land uses. In addition, the City of Poway provided land use and network inputs to the City of San Diego in order to ensure that the model reflected the most up-to-date information with respect to planned development in Poway. Year 2020 forecast volumes on state highways were supplied by Caltrans.

For the purposes of coding the traffic model, a 1,000 unit military housing project was assumed on the MCAS Miramar property. The US Navy is currently studying four sites and associated access options based on environmental analysis. However, in order to provide a worst case evaluation, this 1,000 unit project was assumed to take its access via Pomerado Road. *Rancho Encantada* project traffic

**Table 4.6-7
PROJECT TRIP GENERATION**

LAND USE	INTENSITY ^(c)	TRIP GENERATION RATES	DAILY TRIPS	AM PEAK HOUR			PM PEAK HOUR		
				TOTAL	IN	OUT	TOTAL	IN	OUT
SINGLE FAMILY DWELLING UNITS (URBANIZING), SYCAMORE ESTATES	566	10	5660	453	91	362	566	396	170
MULTIFAMILY DWELLING UNITS (>20), SYCAMORE ESTATES	106	8	848	68	14	54	76	53	23
ELEMENTARY SCHOOL, SYCAMORE ESTATES(ACRES)	12	60	720	187	112	75	36	11	25
PARK, SYCAMORE ESTATES(ACRES)	4	50	200	8	4	4	16	8	8
INSTITUTIONAL, HOUSE OF WORSHIP (ACRES)	12	30	360	14	12	3	29	14	14
SINGLE FAMILY DWELLING UNITS (URBANIZING), MONTECITO	276	10	2760	221	44	177	276	193	83
TOTAL:			10548	951	276	675	999	676	323
INTERNAL/INTERNAL INTERACTION									
SCHOOL/PARK TO RESIDENTIAL ^(a)			280	59	35	24	16	6	10
RESIDENTIAL TO SCHOOL/PARK ^(b)			280	59	24	35	16	10	6
HOUSE OF WORSHIP TO RESIDENTIAL ^(d)			90	4	1	3	7	4	4
RESIDENTIAL TO HOUSE OF WORSHIP ^(d)			90	4	3	1	7	4	4
TOTAL EXTERNAL TRAFFIC GENERATION:			9808	826	214	612	953	653	300
<p>(a) Select zone assignment from non-residential to residential land uses (approximately 30 percent of school/park traffic generation)</p> <p>(b) Select zone assignment from residential to non-residential. Peak hour direction reversed.</p> <p>(c) Intensity in dwelling units unless otherwise specified.</p> <p>(d) Estimated 50 percent capture of house of worship trips from residences within Rancho Encantada</p>									



SOURCE: KIMLEY-HORN and ASSOCIATES

Figure 4.6-3
PROJECT TRAFFIC DISTRIBUTION



generation (based on the proposed land uses previously described) was also input into the regional traffic model. Two access routes were included in this model run:

- Rancho Encantada Parkway, an east/west collector road connecting the project to Pomerado Road. This route loads a majority of project traffic onto Pomerado Road, and then distributes it to three major routes (Pomerado Road northbound, Pomerado Road southbound, and Spring Canyon Road), thus serving as the project's primary access route.
- Creek Road via Beeler Canyon Road, a secondary project access route which had historically served the former General Dynamics use of the Sycamore Estates portion of the project.

For more detailed information regarding the Model, please refer to Appendix C in Technical Appendix E. KHA conducted an additional analysis in the traffic study of the effects of eliminating the proposed Project's traffic connection to Beeler Canyon Road. The analysis is included as Appendix K of the traffic report which is included as Appendix E to this EIR.

IMPACTS TO THE AFFECTED ROADWAY SYSTEM

To assess potential impacts the proposed Project would cause to the surrounding roadway system, Project generated traffic impacts are assessed at two points of time: Opening Day and Year 2020. Under Opening Day, three conditions are assessed to provide a comparison of traffic conditions with and without the proposed Project, including:

- Without Project (provides a baseline against which to measure Project impacts)
- With the Montecito Sub-Project Only, also called the "Initial Project" (indicates an interim condition at partial Project completion); and
- Full Buildout (indicates impacts for implementation of the proposed Precise Plan, including both the Montecito and Sycamore Estates sub-projects).

OPENING DAY

OPENING DAY WITHOUT PROJECT

Opening Day is considered the point in time that Project construction would commence. Because traffic conditions would slightly differ than the existing conditions described earlier in this section due to ongoing development in the area, the Opening Day Without Project conditions are disclosed in the project's Traffic Report (see Appendix E of this EIR) to provide a comparison of traffic conditions with and without implementation of the Project. Traffic volumes at opening day are shown in Figure 4.6-4, *Opening Day without Project Daily Traffic Volumes*.

OPENING DAY WITH INITIAL PROJECT (MONTECITO ONLY)

Opening Day with Initial Project Street Segment/Roadway Capacity Analysis

Opening Day with Initial Project analyzes only the Montecito sub-project (277 single-family detached residential units) being developed to represent an interim buildout condition. The Opening Day traffic conditions assume existing roadway configurations and intersection lane geometry. Impacts from the

Montecito sub-project were added to the opening day volumes to determine the amount of impacts that the initial project would have, and resulting traffic volumes are shown in Figure 4.6-5, *Opening Day with Initial Project Daily Traffic Volumes*. Table 4.6-8, *Comparison of Opening Day and Opening Day with Initial Project Roadway Segment Analysis*, summarizes the effects of adding Montecito traffic to opening day conditions. Based on the significance criteria previously outlined, the addition of Montecito sub-project traffic would have a significant cumulative impact on seven Pomerado Road segments that would operate at LOS F with or without the addition of initial project traffic, and a significant direct impact on one Pomerado Road segment that would worsen from LOS C to LOS F with the addition of Montecito traffic. The cumulative impact at the seven identified segments is due to the change in the volume to capacity ratio in excess of the established City threshold of 0.02 for an existing LOS F condition. Specifically, these Pomerado Road segments are:

- I-15 to Willow Creek (0.051 Change in V/C Ratio)
- Willow Creek Road to Scripps Ranch Boulevard (0.055 Change in V/C Ratio)
- Scripps Ranch Boulevard to Chabad Court (0.059 Change in V/C Ratio)
- Chabad Court to Avenida Magnifica (0.059 Change in V/C Ratio)
- Avenida Magnifica to Fairbrook Road (0.059 Change in V/C Ratio)
- Fairbrook Road to Semillon Boulevard (0.059 Change in V/C Ratio)
- Semillon Boulevard to Spring Canyon Road (0.059 Change in V/C Ratio)

The direct impact is due to the change in LOS from C to F at the following Pomerado Road segment:

- Legacy Point to Treadwell Road/Creek Road (change from LOS C to LOS F)

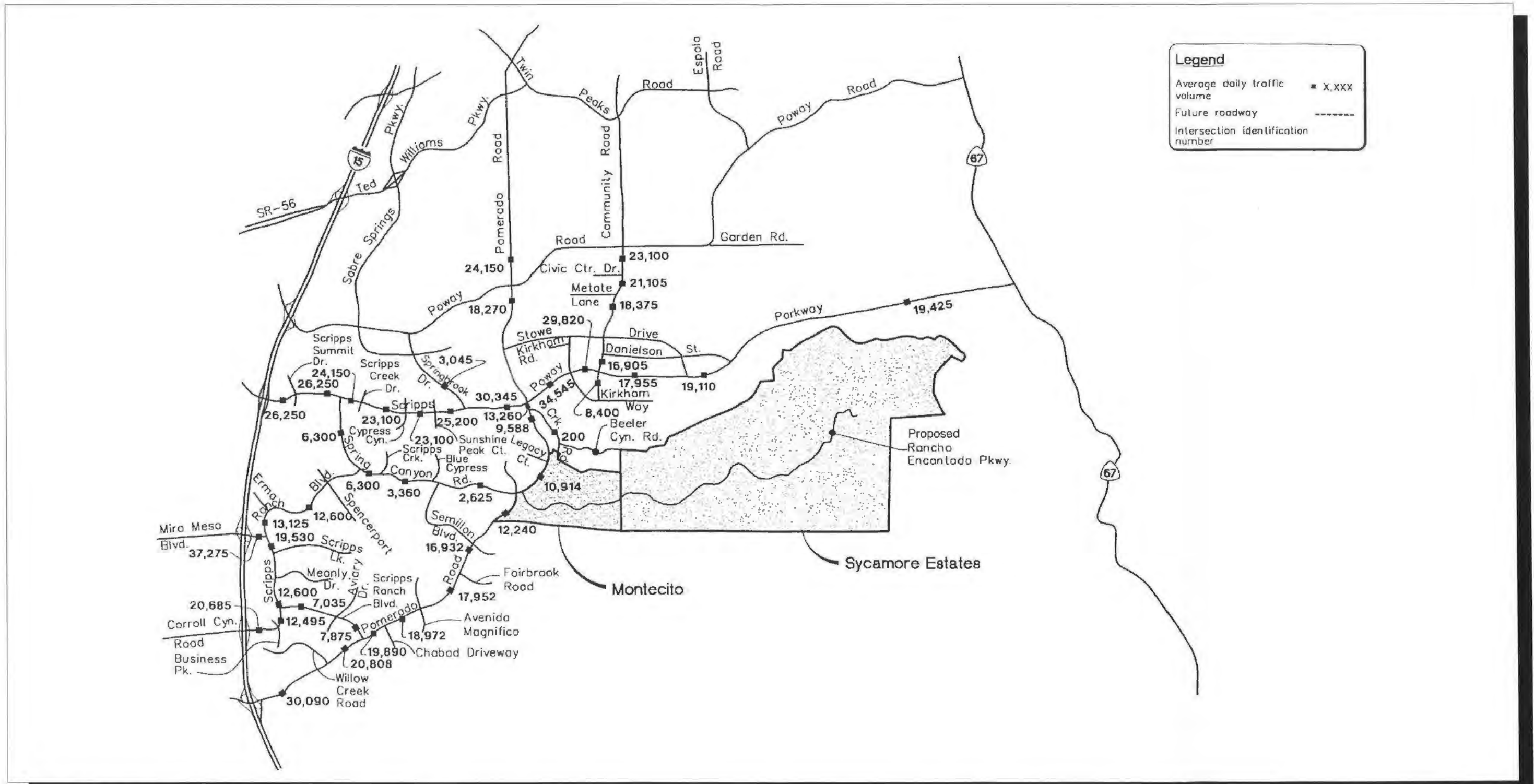
Opening Day with Initial Project Intersection Analysis

Table 4.6-9, *Comparison of Opening Day and Opening Day with Initial Project Intersection Analysis* depicts the findings of Opening Day with the Montecito sub-project only intersection capacity analysis. As shown in this table, five intersections would be cumulatively impacted. Of these intersections, only the contribution to the existing LOS F condition at Pomerado Road/Willow Creek Road and Pomerado Road/Scripps Ranch Boulevard in the AM and PM peak hours would be regarded as cumulatively significant. Contribution of traffic to the other three intersections would be considered cumulative, but not significant, because these intersections would still operate at an acceptable level of service and mitigation would not be required for acceptable conditions.

OPENING DAY WITH PROJECT BUILDOUT

Opening Day with Project Buildout Street Segment/Roadway Capacity Analysis

Table 4.6-10, *Comparison of Opening Day and Opening Day with Project Buildout Roadway Segment Analysis*, summarizes the effects of adding full buildout Project traffic to opening day conditions. Figure 4.6-6, *Opening Day with Project Buildout Daily Traffic Volumes*, shows buildout volumes in the study area. Based on the significance criteria previously outlined, the addition of project buildout traffic would have a significant cumulative impact on the same Pomerado Road segments that would occur with the addition of Montecito-only traffic and listed above. The cumulative impact at the seven identified segments is due to the change in the volume to capacity ratio in excess of the established City threshold of 0.02 for an existing LOS E or F condition. Specifically, these Pomerado Road segments are:



SOURCE: KIMLEY-HORN and ASSOCIATES

Figure 4.6-4
**OPENING DAY WITHOUT PROJECT
 DAILY TRAFFIC VOLUMES**



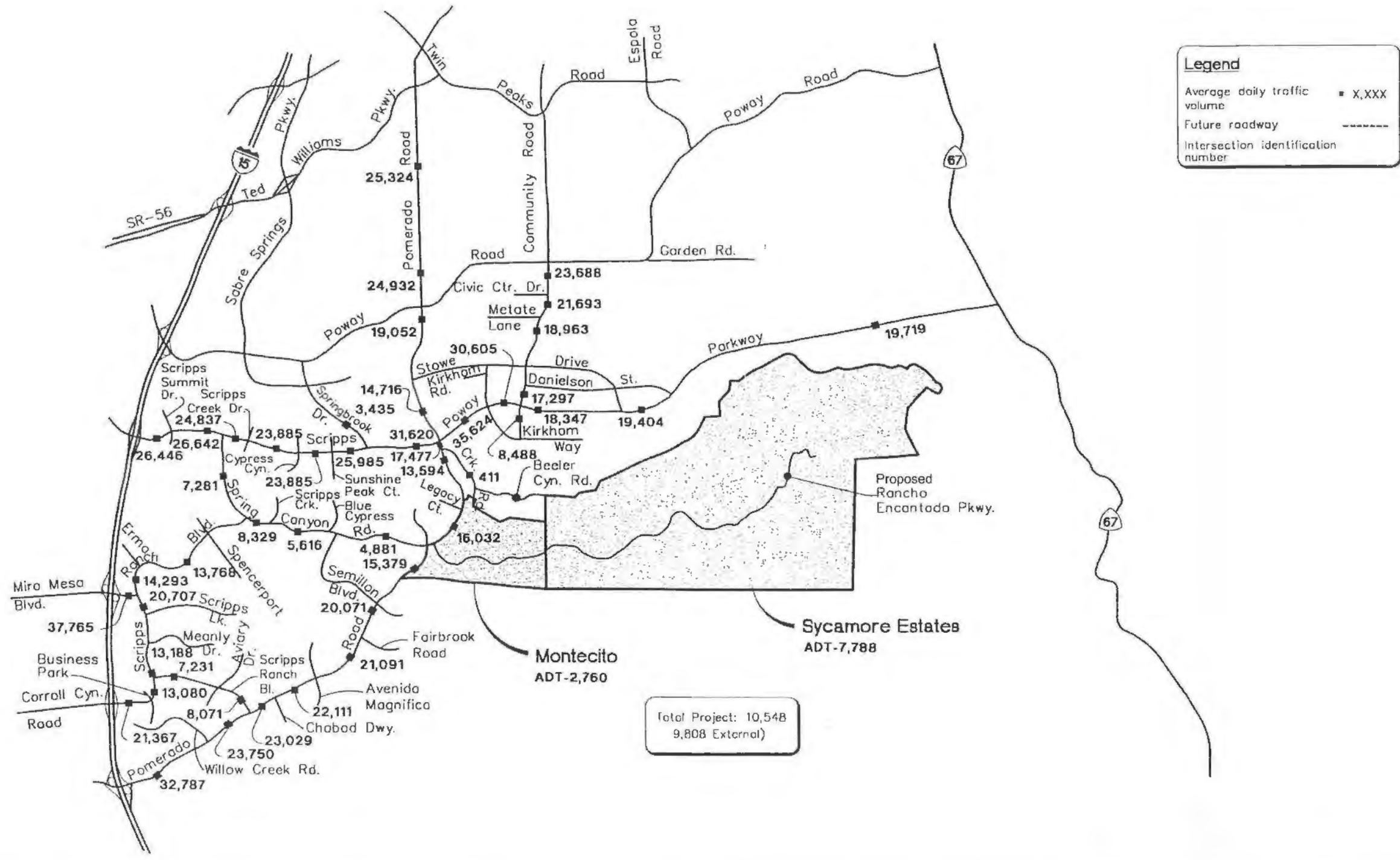
Table 4.6-8
COMPARISON OF OPENING DAY AND OPENING DAY WITH INITIAL PROJECT ROADWAY SEGMENT ANALYSIS

STREET	SEGMENT	OPENING DAY WITHOUT PROJECT V/C	OPENING DAY WITHOUT PROJECT LOS	OPENING DAY WITH INITIAL PROJECT ONLY				
				V/C	LOS	CHANGE IN V/C	SIGNIFICANT? (Y/N)	
SCRIPPS POWAY PARKWAY	I-15 TO SCRIPPS SUMMIT DR.	0.438	B	0.438	B	0.001	NO	
	SCRIPPS SUMMIT DR. TO SPRING CANYON RD.	0.438	B	0.438	B	0.002	NO	
	SPRING CANYON TO SCRIPPS CREEK DR.	0.604	C	0.609	C	0.005	NO	
	SCRIPPS CREEK DR. TO CYPRESS CYN. RD.	0.513	B	0.518	B	0.005	NO	
	CYPRESS CYN. RD. TO SUNSHINE PEAK	0.513	B	0.518	B	0.005	NO	
	SUNSHINE PEAK TO SPRINGBROOK DR.	0.580	B	0.585	B	0.005	NO	
	SPRING BROOK DR. TO POMERADO RD.	0.506	B	0.512	B	0.006	NO	
	POMERADO RD. TO KIRKHAM RD.	0.575	B	0.581	B	0.005	NO	
	KIRKHAM RD. TO COMMUNITY RD.	0.497	B	0.501	B	0.004	NO	
	COMMUNITY RD. TO STOWE DR.	0.299	A	0.301	A	0.002	NO	
	STOWE DR. TO DANIELSON ST.	0.319	A	0.320	A	0.001	NO	
	DANIELSON ST. TO SR 87	0.324	A	0.325	A	0.001	NO	
	POMERADO ROAD	I-15 TO WILLOW CREEK RD.	2.008	F	2.057	F	0.051	YES
WILLOW CRK. RD. TO SCRIPPS RANCH BLVD.		1.387	F	1.442	F	0.055	YES	
SCRIPPS RANCH BLVD. TO CHABAD CT		1.326	F	1.385	F	0.059	YES	
CHABAD CT. TO AVENIDA MAGNIFICA		1.265	F	1.324	F	0.059	YES	
AVENIDA MAGNIFICA TO FAIRBROOK RD.		1.197	F	1.256	F	0.059	YES	
FAIRBROOK RD. TO SEMILLON BLVD.		1.129	F	1.188	F	0.059	YES	
SEMILLON BLVD. TO SPRING CYN. RD.		0.518	D	0.675	E	0.059	YES	
SPRING CYN. RD. TO LEGACY PT.		0.728	D	0.304	A	0.000	NO	
LEGACY PT. TO TREADWELL CREEK RD.		0.839	C	0.718	F	0.079	YES	
TREADWELL CRK. RD. TO SCRIPPS PWY PKWY.		0.332	A	0.361	A	0.030	NO	
SCRIPPS PWY PKWY. TO STOWE DRIVE		0.321	A	0.334	A	0.013	NO	
STOWE DR. TO METATE LANE		0.324	A	0.335	A	0.011	NO	
METATE LANE TO POWAY RD.		0.457	B	0.466	B	0.009	NO	
POWAY RD. TO ROBISON BLVD.		0.804	C	0.613	C	0.009	NO	
ROBISON BLVD. TO TED WILLIAMS PKWY.		0.614	C	0.623	C	0.008	NO	
COMMUNITY ROAD		POWAY RD. TO CIVIC CENTER DR.	0.578	C	0.682	C	0.004	NO
		CIVIC CENTER DR. TO METATE LANE	0.529	C	0.532	C	0.004	NO
		METATE LANE TO STOWE DR.	0.459	B	0.464	B	0.004	NO
		STOWE DR. TO SCRIPPS POWAY PKWY.	0.423	B	0.425	B	0.003	NO
	SCRIPPS POWAY PKWY. TO KIRKHAM WAY	0.280	B	0.281	B	0.001	NO	
MIRA MESA BOULEVARD	I-15 TO SCRIPPS RANCH BLVD.	0.748	C	0.748	C	0.003	NO	
	SPRING CANYON RD. TO ERMA RD.	0.315	A	0.323	A	0.008	NO	
SCRIPPS RANCH BOULEVARD	ERMA RD. TO MIRA MESA BLVD.	0.328	A	0.338	A	0.009	NO	
	MIRA MESA BLVD. TO SCRIPPS LAKE DR.	0.488	B	0.487	B	0.008	NO	
	SCRIPPS LAKE DR. TO CARROLL CANYON RD.	0.315	A	0.319	A	0.004	NO	
	CARROLL CANYON RD. TO AVIARY DR.	0.178	A	0.177	A	0.001	NO	
	AVIARY DR. TO POMERADO RD.	0.197	A	0.198	A	0.001	NO	
	SPRING CANYON ROAD	SCRIPPS POWAY PKWY. TO SCRIPPS CREEK RD.	0.210	A	0.219	A	0.009	NO
CARROLL CANYON ROAD	SCRIPPS CREEK RD. TO SEMILLON BLVD.	0.112	A	0.133	A	0.021	NO	
	SEMILLON BLVD. TO POMERADO RD.	0.088	A	0.106	A	0.021	NO	
	SCRIPPS RANCH BLVD. TO BUSINESS PARK AVE.	0.140	A	0.140	A	0.000	NO	
SPRINGBROOK DRIVE	BUSINESS PARK AVE. TO I-15	0.175	A	0.175	A	0.000	NO	
	SABRE SPRINGS PKWY. TO SCRIPPS POWAY PKWY.	0.140	A	0.140	A	0.000	NO	
CREEK ROAD	CREEK RD.	0.025	A	0.025	A	0.000	NO	

SIGNALIZED INTERSECTIONS	OPENING DAY WITHOUT PROJECT				OPENING DAY WITH INITIAL PROJECT DEVELOPMENT							
	AM DELAY	AM LOS	PM DELAY	PM LOS	AM DELAY	AM LOS	CHANGE (b)	SIGNIFICANT?	PM DELAY	PM LOS	CHANGE (a)	SIGNIFICANT?
1. Poway Road/Community Road	13.9	B	17.8	C	14.4	B	0.9	NO	18.3	C	0.4	NO
2. Civic Center Drive/Community Road	17.3	C	18.7	C	18.8	C	1.3	NO	20.9	C	1.2	NO
3. Metata Lane/Community Road	8.1	B	9.3	B	8.1	B	0.0	NO	11.2	B	1.9	NO
4. Stone Drive/Community Road	12.9	B	15.1	C	14.9	B	2.0	NO	15.8	C	0.7	NO
5. Scripps Poway Parkway/Community Road	13.0	B	17.9	C	13.9	B	0.9	NO	31.2	D	13.3	YES
7. Scripps Poway Parkway/Scripps Summit Road	5.9	B	10.9	B	5.9	B	0.1	NO	10.9	B	0.0	NO
8. Scripps Poway Parkway/Spring Canyon Road	20.1	C	16.7	C	20.2	C	0.1	NO	18.9	C	0.2	NO
9. Scripps Poway Parkway/Scripps Creek Drive	17.7	C	15.3	C	18.0	C	0.3	NO	15.8	C	0.3	NO
10. Scripps Poway Parkway/Cypress Canyon Road	13.2	B	11.7	B	13.3	B	0.1	NO	11.8	B	0.1	NO
11. Scripps Poway Parkway/Sunshine Peak	8.0	B	8.3	B	8.0	B	0.0	NO	8.5	B	0.2	NO
12. Scripps Poway Parkway/Springbrook Drive	18.1	C	18.7	C	18.2	C	0.1	NO	18.8	C	0.1	NO
13. Scripps Poway Parkway/Pomeroado Road	18.7	C	23.0	C	20.2	C	1.5	NO	23.5	C	0.5	NO
14. Scripps Poway Parkway/Oldum Road	19.2	C	7.3	B	21.2	C	2.0	NO	7.8	B	0.5	NO
15. Scripps Poway Parkway/Stone Drive	10.2	B	9.7	B	10.2	B	0.0	NO	9.7	B	0.0	NO
18. Scripps Poway Parkway/Danielson Street	10.4	B	8.2	B	10.4	B	0.0	NO	8.2	B	0.0	NO
17. Pomeroado Road/Willow Creek	-	F	-	F	-	F	2.21%	YES	-	F	2.42%	YES
18. Pomeroado Road/Scripps Ranch Boulevard	-	F	-	F	-	F	3.05%	YES	-	F	3.57%	YES
19. Pomeroado Road/Chabad Court	9.1	B	9.4	B	10.7	B	1.8	NO	10.5	B	1.1	NO
20. Pomeroado Road/Avenida Magnifica	22.8	C	18.1	C	23.8	C	1.0	NO	19.9	C	1.8	NO
21. Pomeroado Road/Fairbrook Road	8.5	B	11.5	B	7.1	B	0.8	NO	11.7	B	0.2	NO
22. Pomeroado Road/Sanilton Boulevard	9.8	B	12.4	B	9.9	B	0.1	NO	12.5	B	0.1	NO
23. Spring Canyon/Pomeroado Road	14.8	B	18.8	C	17.7	C	2.9	NO	21.5	C	2.9	NO
24. Pomeroado Road/Legacy Point	7.9	B	13.1	B	8.3	B	0.4	NO	15.1	C	2.0	NO
25. Pomeroado Road/Creek Road	17.9	C	11.4	B	19.1	C	1.2	NO	18.2	C	4.8	YES
26. Spring Canyon Road/Blue Cypress Drive	18.0	C	5.8	B	18.3	C	0.3	NO	6.7	B	-0.1	NO
27. Scripps Ranch Boulevard/Spring Canyon Road	20.2	C	8.5	B	20.9	C	0.7	NO	8.7	B	0.2	NO
28. Scripps Ranch Boulevard/Farmingdale	11.1	B	9.1	B	11.3	B	0.2	NO	9.1	B	0.0	NO
29. Scripps Ranch Boulevard/Erma Road	18.4	C	11.9	B	21.1	C	1.7	NO	11.9	B	0.0	NO
30. Scripps Ranch Boulevard/Mira Mesa Boulevard	71.8	F	12.5	B	-	F	0.87%	NO	12.8	B	0.0	NO
31. Scripps Ranch Boulevard/Haban Road	13.8	B	24.7	C	14.1	B	0.30	NO	25.6	D	0.9	NO
32. Scripps Ranch Boulevard/Scripps Lake Drive	22.0	C	19.3	C	22.2	C	0.2	NO	19.4	C	0.1	NO
33. Scripps Ranch Boulevard/Mearny Drive	10.3	B	14.5	B	10.4	B	0.1	NO	14.6	B	0.1	NO
34. Scripps Ranch Boulevard/Scripps Ranch Court	17.8	C	18.3	C	18.1	C	0.3	NO	18.3	C	0.0	NO
35. Mira Mesa Boulevard/15 NB Off Ramp	15.3	C	39.4	D	15.4	C	0.1	NO	39.7	D	0.3	NO
36. Mira Mesa Boulevard/15 SB Off Ramp	30.2	D	14.2	B	31.1	D	0.9	NO	14.3	B	0.1	NO
37. Carrol Canyon Road/15 NB Off Ramp	45.3	E	15.5	C	46.4	E	1.1	NO	15.6	C	0.0	NO
38. Carrol Canyon Road/15 SB Off Ramp	65.4	F	47.0	E	-	F	0.17%	NO	47.5	E	0.5	NO
39. Pomeroado Road/15 NB Off Ramp	11.2	B	9.5	B	11.8	B	0.6	NO	10.0	B	0.5	NO
40. Pomeroado Road/15 SB Off Ramp	32.4	D	12.2	B	32.5	D	0.1	NO	12.3	B	0.1	NO
41. Scripps Poway Parkway/15 NB Off Ramp	31.4	D	25.4	D	32.0	D	0.6	NO	25.5	D	0.1	NO
42. Scripps Poway Parkway/15 SB Off Ramp	13.4	B	21.0	C	13.4	B	0.0	NO	21.1	C	0.1	NO
43. Carrol Canyon Road/Business Park	15.2	C	18.6	C	15.3	C	0.1	NO	18.7	C	0.1	NO
44. Poway Road/Sabra Springs Parkway	18.7	C	26.0	C	18.8	C	0.1	NO	22.4	C	-2.5	NO
45. Pomeroado Road/Rancho Encantada Parkway	0.1	A	0.1	A	8.4	B	8.3	YES	3.8	A	3.7	NO
46. Pomeroado Road/Stone Drive	9.5	B	9.1	B	9.6	B	0.1	NO	9.7	B	0.6	NO
47. Pomeroado Road/Old Pomeroado Road	11.5	B	11.4	B	11.6	B	0.1	NO	11.5	B	0.1	NO
48. Pomeroado Road/Metata Lane	12.3	B	9.8	B	12.4	B	0.1	NO	11.8	B	2.0	NO
49. Pomeroado Road/Oak Knoll Road	13.1	B	13.9	B	13.2	B	0.1	NO	14.0	B	0.2	NO
50. Pomeroado Road/Poway Road	18.4	C	24.8	C	18.5	C	0.1	NO	24.4	D	0.6	NO
51. Pomeroado Road/9th Street	13.4	B	7.5	B	13.4	B	0.0	NO	7.7	B	0.2	NO
52. Pomeroado Road/Meadowrock Lane	13.7	B	7.3	B	13.7	B	0.0	NO	7.4	B	0.1	NO
53. Pomeroado Road/Glen Oak Road	9.3	B	9.3	B	9.4	B	0.1	NO	9.4	B	0.1	NO
54. Pomeroado Road/Ted Williams Parkway	15.1	C	16.5	C	15.4	C	0.3	NO	16.7	C	0.2	NO

SOURCE: KIMLEY-HORN and ASSOCIATES

Table 4.6-9
COMPARISON OF OPENING DAY AND
OPENING DAY WITH INITIAL PROJECT INTERSECTION ANALYSIS



SOURCE: KIMLEY-HORN and ASSOCIATES

Figure 4.6-6
OPENING DAY WITH PROJECT
DAILY TRAFFIC VOLUMES

Table 4.6-10
COMPARISON OF OPENING DAY AND OPENING DAY WITH PROJECT BUILDOUT ROADWAY SEGMENT ANALYSIS

STREET	SEGMENT	OPENING DAY WITHOUT PROJECT V/C	OPENING DAY WITHOUT PROJECT LOS	OPENING DAY WITH PROJECT				
				V/C	LOS	CHANGE IN V/C	SIGNIFICANT? (Y/N)	
SCRIPPS POWAY PARKWAY	L-15 TO SCRIPPS SUMMIT DR.	0.438	B	0.441	B	0.003	NO	
	SCRIPPS SUMMIT DR. TO SPRING CANYON RD.	0.438	B	0.444	B	0.007	NO	
	SPRING CANYON TO SCRIPPS CREEK DR.	0.804	C	0.821	C	0.017	NO	
	SCRIPPS CREEK DR. TO CYPRESS CYN. RD.	0.513	B	0.531	B	0.017	NO	
	CYPRESS CYN. RD. TO SUNSHINE PEAK	0.513	B	0.531	B	0.017	NO	
	SUNSHINE PEAK TO SPRINGBROOK DR.	0.580	B	0.577	B	0.017	NO	
	SPRING BROOK DR. TO POMERADO RD.	0.506	B	0.527	B	0.021	NO	
	POMERADO RD. TO KIRKHAM RD.	0.576	B	0.594	C	0.018	NO	
	KIRKHAM RD. TO COMMUNITY RD.	0.497	B	0.510	B	0.013	NO	
	COMMUNITY RD. TO STOWE DR.	0.299	A	0.308	A	0.007	NO	
	STOWE DR. TO DANIELSON ST.	0.319	A	0.323	A	0.005	NO	
	DANIELSON ST. TO SR 67	0.324	A	0.329	A	0.005	NO	
	POMERADO ROAD	L-15 TO WILLOW CREEK RD.	3.006	F	3.186	F	0.180	YES
		WILLOW CRK. RD. TO SCRIPPS RANCH BLVD.	1.387	F	1.583	F	0.196	YES
SCRIPPS RANCH BLVD. TO CHABAD CT.		1.326	F	1.535	F	0.209	YES	
CHABAD CT. TO AVENIDA MAGNIFICA		1.285	F	1.474	F	0.209	YES	
AVENIDA MAGNIFICA TO FAIRBROOK RD.		1.197	F	1.406	F	0.209	YES	
FAIRBROOK RD. TO SEMILLON BLVD.		1.129	F	1.338	F	0.209	YES	
SEMILLON BLVD. TO SPRING CYN. RD.		0.818	D	1.025	F	0.209	YES	
SPRING CYN. RD. TO LEGACY PT.		0.728	D	0.401	B	0.000	NO	
LEGACY PT. TO TREADWELL/CREEK RD.		0.639	C	0.908	F	0.267	YES	
TREADWELL/CRK RD. TO SCRIPPS PWY PKWY.		0.532	A	0.437	B	0.105	YES	
SCRIPPS PWY PKWY. TO STOWE DRIVE		0.321	A	0.368	A	0.047	NO	
STOWE DR. TO METATE LANE		0.324	A	0.383	A	0.059	NO	
METATE LANE TO POWAY RD.		0.457	B	0.478	B	0.020	NO	
POWAY RD. TO ROBISON BLVD.		0.804	C	0.823	C	0.020	NO	
ROBISON BLVD. TO TED WILLIAMS PKWY.		0.814	C	0.633	C	0.019	NO	
COMMUNITY ROAD		POWAY RD. TO CIVIC CENTER DR.	0.578	C	0.592	C	0.015	NO
		CIVIC CENTER DR. TO METATE LANE	0.528	C	0.542	C	0.015	NO
	METATE LANE TO STOWE DR.	0.459	B	0.474	B	0.015	NO	
	STOWE DR. TO SCRIPPS POWAY PKWY.	0.423	B	0.432	B	0.010	NO	
	SCRIPPS POWAY PKWY. TO KIRKHAM WAY	0.280	B	0.283	B	0.003	NO	
MIRA MESA BOULEVARD	L-15 TO SCRIPPS RANCH BLVD.	0.748	C	0.755	C	0.010	NO	
SCRIPPS RANCH BOULEVARD	SPRING CANYON RD. TO ERMA RD.	0.316	A	0.344	A	0.028	NO	
	ERMA RD. TO MIRA MESA BLVD.	0.329	A	0.357	A	0.028	NO	
	MIRA MESA BLVD. TO SCRIPPS LAKE DR.	0.488	B	0.518	B	0.029	NO	
	SCRIPPS LAKE DR. TO CARROLL CANYON RD.	0.315	A	0.330	A	0.015	NO	
	CARROLL CANYON RD. TO AVIARY DR.	0.178	A	0.181	A	0.003	NO	
	AVIARY DR. TO POMERADO RD.	0.197	A	0.202	A	0.005	NO	
SPRING CANYON ROAD	SCRIPPS POWAY PKWY. TO SCRIPPS CREEK RD.	0.210	A	0.243	A	0.033	NO	
	SCRIPPS CREEK RD. TO SEMILLON BLVD.	0.112	A	0.187	A	0.075	NO	
	SEMILLON BLVD. TO POMERADO RD.	0.088	A	0.183	A	0.095	NO	
CARROLL CANYON ROAD	SCRIPPS RANCH BLVD. TO BUSINESS PARK AVE.	0.140	A	0.140	A	0.000	NO	
	BUSINESS PARK AVE. TO L-15	0.175	A	0.175	A	0.000	NO	
SPRINGBROOK DRIVE	SABRE SPRINGS PKWY. TO SCRIPPS POWAY PKWY.	0.140	A	0.140	A	0.000	NO	
CREEK ROAD	CREEK RD.	0.025	A	0.051	A	0.026	NO	

- I-15 to Willow Creek (0.180 Change in V/C Ratio)
- Willow Creek Road to Scripps Ranch Boulevard (0.196 Change in V/C Ratio)
- Scripps Ranch Boulevard to Chabad Court (0.209 Change in V/C Ratio)
- Chabad Court to Avenida Magnifica (0.209 Change in V/C Ratio)
- Avenida Magnifica to Fairbrook Road (0.209 Change in V/C Ratio)
- Fairbrook Road to Semillon Boulevard (0.209 Change in V/C Ratio)
- Semillon Boulevard to Spring Canyon Road (0.209 Change in V/C Ratio)

In addition, a direct impact would occur at one segment due to the change in LOS from C to F at the following Pomerado Road segment:

- Legacy Point to Treadwell Road/Creek Road (change from LOS C to LOS F)

Opening Day with Project Buildout Intersection Analysis

Table 4.6-11, *Comparison of Opening Day and Opening Day with Project Buildout Intersection Analysis* depicts the findings of Opening Day with full Project Buildout intersection capacity analysis. As shown in this table, four intersections would be cumulatively impacted under the Full Buildout scenario. Of these four intersections, three would be regarded as cumulatively significant. These include:

- Scripps Poway Parkway/Pomerado Road
- Pomerado Road/Willow Creek; and
- Pomerado Road/Scripps Ranch Boulevard

At these three intersections, the addition of Full Buildout project traffic would contribute to existing LOS F conditions in the AM and PM peak hours. The fourth intersection, Pomerado Road/Rancho Encantada Parkway, would not be regarded as significant because it would still operate at an acceptable level of service and mitigation would not be required for acceptable conditions. A significant direct impact would occur at one intersection:

- Pomerado Road/I-15 Northbound Off-Ramp (change from LOS D to LOS E, AM Peak Hour)

OPENING DAY CMP OPERATIONS

Opening Day with Initial Project CMP Analysis (Montecito Only)

In conformance with the requirements of the CMP, peak hour arterial analysis was conducted for segments of Scripps Poway Parkway and Pomerado Road. As shown on Table 4.6-12, *Significance of CMP Analysis*, a significant cumulative impact would occur on Pomerado Road between I-15 and Treadwell Road eastbound in the PM peak hour and westbound in the AM peak hour.

Opening Day with Project Buildout CMP Analysis

As shown by Table 4.6-12, the significant cumulative impacts would occur along the same roadway segments as would occur under the Initial Project scenario. A significant cumulative impact would occur on Pomerado Road between I-15 and Treadwell Road eastbound in the PM peak hour and westbound in the AM peak hour.

SIGNALIZED INTERSECTIONS	OPENING DAY WITHOUT PROJECT				OPENING DAY WITH PROJECT							
	AM DELAY	AM LOS	PM DELAY	PM LOS	AM DELAY	AM LOS	CHANGE (a)	SIGNIFICANT?	PM DELAY	PM LOS	CHANGE (a)	SIGNIFICANT?
1. Poway Road/Community Road	13.9	B	17.9	C	15.8	C	1.9	NO	18.8	C	1.7	NO
2. Civic Center Drive/Community Road	17.3	C	19.7	C	19.8	C	2.3	NO	21.1	C	1.4	NO
3. Melate Lane/Community Road	8.1	B	9.3	B	8.3	B	0.2	NO	12.6	B	3.3	NO
4. Slows Drive/Community Road	12.9	D	15.1	C	15.1	C	2.2	NO	18.8	C	1.5	NO
5. Scripps Poway Parkway/Community Road	13.0	B	17.9	C	15.9	C	2.9	NO	33.8	D	15.9	YES
7. Scripps Poway Parkway/Scripps Summit Road	5.8	B	10.9	B	5.9	B	0.1	NO	11.1	B	0.2	NO
8. Scripps Poway Parkway/Spring Canyon Road	20.1	C	18.7	C	20.6	C	0.5	NO	19.2	C	0.5	NO
9. Scripps Poway Parkway/Scripps Creek Drive	17.7	C	15.3	C	18.0	C	1.3	NO	16.7	C	1.4	NO
10. Scripps Poway Parkway/Cypress Canyon Road	13.2	B	11.7	E	13.6	B	0.4	NO	12.2	B	0.5	NO
11. Scripps Poway Parkway/Sunshine Peak	8.0	B	8.3	B	8.2	B	0.2	NO	8.8	B	0.3	NO
12. Scripps Poway Parkway/Springbrook Drive	18.1	C	18.7	C	18.1	C	1.0	NO	18.6	C	0.8	NO
13. Scripps Poway Parkway/Pomerado Road	18.7	C	23.0	C	22.4	C	3.7	NO	25.6	D	2.8	YES
14. Scripps Poway Parkway/Kirkham Road	19.2	C	7.3	B	24.2	C	5.0	YES	9.8	B	2.5	NO
15. Scripps Poway Parkway/Slows Drive	10.2	B	9.7	B	10.2	B	0.0	NO	9.7	B	0.0	NO
16. Scripps Poway Parkway/Danielson Street	10.4	B	8.2	B	10.4	B	0.0	NO	8.2	B	0.0	NO
17. Pomerado Road/Willow Creek	-	F	-	F	-	F	7.86%	YES	-	F	7.93%	YES
18. Pomerado Road/Scripps Ranch Boulevard	-	F	-	F	-	F	10.64%	YES	-	F	11.38%	YES
19. Pomerado Road/Chabad Court	9.1	B	9.4	B	12.2	B	3.1	NO	11.3	B	1.9	NO
20. Pomerado Road/Avenida Magnifica	22.9	C	18.1	C	24.8	C	1.90	NO	21.9	C	3.8	NO
21. Pomerado Road/Fairbrook Road	8.5	B	11.5	B	10.7	B	4.2	NO	12.1	B	0.8	NO
22. Pomerado Road/Samilton Boulevard	9.8	B	12.4	B	10.3	B	0.5	NO	12.8	B	0.4	NO
23. Spring Canyon/Pomerado Road	14.6	B	16.6	C	19.4	C	4.6	YES	28.2	D	9.8	YES
24. Pomerado Road/Legacy Point	7.9	B	13.1	B	10.7	B	2.8	NO	15.7	C	2.8	NO
25. Pomerado Road/Creek Road	17.9	C	11.4	B	21.5	C	3.6	NO	16.4	C	5.0	YES
26. Spring Canyon Road/Blue Cypress Drive	15.0	C	5.8	B	17.8	C	1.8	NO	8.1	B	0.3	NO
27. Scripps Ranch Boulevard/Spring Canyon Road	20.2	C	8.6	A	24.1	C	3.9	NO	9.2	B	0.7	NO
28. Scripps Ranch Boulevard/Farmingdale	11.1	B	8.1	B	11.6	B	0.5	NO	9.2	B	0.1	NO
29. Scripps Ranch Boulevard/Erma Road	19.4	C	11.9	B	23.2	C	3.8	NO	12.1	B	0.2	NO
30. Scripps Ranch Boulevard/Mira Mesa Boulevard	21.8	F	12.8	B	-	F	2.48%	YES	13.1	B	0.3	NO
31. Scripps Ranch Boulevard/Viberti Road	13.8	B	24.7	C	14.7	B	0.8	NO	28.0	D	1.3	NO
32. Scripps Ranch Boulevard/Berkeley Lake Drive	22.0	C	19.3	C	22.9	C	0.9	NO	19.8	C	0.5	NO
33. Scripps Ranch Boulevard/Meany Drive	10.3	B	14.5	B	10.5	B	0.2	NO	14.8	B	0.3	NO
34. Scripps Ranch Boulevard/Scripps Ranch Court	17.8	C	18.3	C	18.6	C	0.8	NO	18.6	C	0.3	NO
35. Mira Mesa Boulevard/1-16 NB Off Ramp	15.3	C	39.4	D	15.6	C	0.3	NO	40.5	E	1.1	NO
36. Mira Mesa Boulevard/1-16 SB Off Ramp	30.2	D	14.2	B	31.5	D	1.70	NO	14.4	B	0.2	NO
37. Carroll Canyon Road/1-15 NB Off Ramp	45.3	E	16.0	C	49.9	E	1.8	NO	15.6	C	0.0	NO
38. Carroll Canyon Road/1-15 SB Off Ramp	65.4	F	47.0	E	-	F	0.80%	NO	48.5	E	1.5	NO
39. Pomerado Road/1-15 NB Off Ramp	11.2	B	9.5	B	14.5	B	3.3	NO	12.4	B	2.8	NO
40. Pomerado Road/1-15 SB Off Ramp	32.4	D	12.2	B	33.2	D	0.8	NO	12.8	B	0.7	NO
41. Scripps Poway Parkway/1-16 NB Off Ramp	31.4	D	28.4	D	32.5	D	1.1	NO	25.8	D	0.4	NO
42. Scripps Poway Parkway/1-15 SB Off Ramp	13.4	B	21.0	C	13.4	B	0.0	NO	21.2	C	0.2	NO
43. Carroll Canyon Road/Business Park	16.7	C	18.8	C	15.9	C	0.3	NO	18.8	C	0.2	NO
44. Poway Road/Babe Springs Parkway	18.7	C	25.0	C	19.1	C	0.4	NO	26.5	D	1.5	NO
45. Pomerado Road/Rancho Encantada Parkway	0.1	A	0.1	A	11.5	B	11.4	YES	14.2	B	14.1	YES
46. Pomerado Road/Slows Drive	9.5	B	9.1	B	10.0	B	0.5	NO	10.2	B	1.1	NO
47. Pomerado Road/Old Pomerado Road	11.5	B	11.4	B	11.7	B	0.2	NO	12.8	B	1.4	NO
48. Pomerado Road/Melate Lane	12.3	B	9.8	B	13.0	B	0.7	NO	12.8	B	3.1	NO
49. Pomerado Road/Oak Knoll Road	13.1	B	13.8	B	13.8	B	0.7	NO	15.2	C	1.4	NO
50. Pomerado Road/Poway Road	18.4	C	24.6	C	17.3	C	0.9	NO	28.2	D	1.6	NO
51. Pomerado Road/5th Street	13.4	B	7.5	B	13.5	B	0.1	NO	8.0	B	0.5	NO
52. Pomerado Road/Meadowbrook Lane	13.7	B	7.3	B	14.0	B	0.3	NO	7.7	B	0.4	NO
53. Pomerado Road/Glen Oak Road	9.3	B	8.3	B	9.7	B	0.4	NO	8.7	B	0.4	NO
54. Pomerado Road/Ted Williams Parkway	15.1	C	16.5	C	16.2	C	1.1	NO	17.1	C	0.5	NO

SOURCE: KIMLEY-HORN and ASSOCIATES

Table 4.6-11
COMPARISON OF OPENING DAY AND
OPENING DAY WITH PROJECT BUILDOUT INTERSECTION ANALYSIS

**Table 4.6-12
SIGNIFICANCE OF CMP ANALYSIS**

STREET SEGMENT	DIRECTION	OPENING DAY WITHOUT PROJECT							
		AM SPEED (a)	AM LOS	PM SPEED (a)	PM LOS				
SCRIPPS POWAY PARKWAY I-15 TO POMERADO ROAD	Eastbound	38.9	A	35.3	A				
	Westbound	37.2	A	35.2	A				
POMERADO ROAD I-15 TO TREADWELL ROAD	Eastbound	38.4	A	23.3	C				
	Westbound	30.2	B	33.1	B				
TREADWELL ROAD TO TED WILLIAMS PKWY.	Northbound	29.4	B	27.0	C				
	Southbound	27.4	C	30.1	B				
STREET SEGMENT	DIRECTION	OPENING DAY WITH INITIAL PROJECT ONLY							
SCRIPPS POWAY PARKWAY I-15 TO POMERADO ROAD	Eastbound	38.1	A	0.8	NO	34.3	B	1.0	NO
	Westbound	35.7	A	1.5	NO	34.8	A	0.4	NO
POMERADO ROAD I-15 TO TREADWELL ROAD	Eastbound	38.4	A	0.0	NO	20.3	D	3.0	YES
	Westbound	24.3	C	5.9	YES	31.8	B	1.1	NO
TREADWELL ROAD TO TED WILLIAMS PKWY.	Northbound	29.3	B	0.1	NO	26.3	C	0.8	NO
	Southbound	27.2	B	0.1	NO	29.9	B	0.3	NO
STREET SEGMENT	DIRECTION	OPENING DAY WITH PROJECT							
SCRIPPS POWAY PARKWAY I-15 TO POMERADO ROAD	Eastbound	35.4	A	1.5	NO	32.7	B	2.8	NO
	Westbound	35.0	A	2.2	NO	34.3	B	0.8	NO
POMERADO ROAD I-15 TO TREADWELL ROAD	Eastbound	34.0	B	2.4	NO	19.4	D	3.9	YES
	Westbound	21.4	D	8.8	YES	32.2	B	0.9	NO
TREADWELL ROAD TO TED WILLIAMS PKWY.	Northbound	29.1	B	0.3	NO	26.1	C	0.9	NO
	Southbound	28.6	C	0.7	NO	29.3	B	0.8	NO
STREET SEGMENT	DIRECTION	YEAR 2020 BUILDOUT WITHOUT PROJECT							
SCRIPPS POWAY PARKWAY I-15 TO POMERADO ROAD	Eastbound	19.3	D	29.2	D				
	Westbound	19.9	D	22.8	C				
POMERADO ROAD I-15 TO TREADWELL ROAD	Eastbound	21.8	C	17.5	D				
	Westbound	15.8	E	30.2	B				
TREADWELL ROAD TO TED WILLIAMS PKWY.	Northbound	23.8	C	14.5	E				
	Southbound	19.8	D	26.2	C				
STREET SEGMENT	DIRECTION	YEAR 2020 BUILDOUT WITH PROJECT							
SCRIPPS POWAY PARKWAY I-15 TO POMERADO ROAD	Eastbound	17.3	D	1.1	YES	16.7	D	3.5	YES
	Westbound	16.5	D	2.3	YES	22.7	C	0.1	NO
POMERADO ROAD I-15 TO TREADWELL ROAD	Eastbound	20.1	D	1.8	YES	12.3	F	5.2	YES
	Westbound	13.1	E	2.5	YES	28.7	B	1.4	NO
TREADWELL ROAD TO TED WILLIAMS PKWY.	Northbound	22.8	C	1.0	NO	12.7	E	1.8	YES
	Southbound	14.5	E	5.1	YES	25.1	C	1.1	NO
WITH PROPOSED MITIGATION (b) TREADWELL ROAD TO TED WILLIAMS PKWY.	Northbound	24.1	C	-0.5	NO	13.8	E	0.7	NO
	Southbound	19.2	D	0.4	NO	28.8	C	-0.8	NO

(a) Average vehicle speed, in mph
 (b) Improvements to the Pomerado Road/Scrapps Poway Parkway intersection. See Section V for details.

OPENING DAY I-15 FREEWAY RAMP METER ANALYSIS**Opening Day with Initial Project Ramp Meter Analysis (Montecito Only)**

Table 4.6-13, *Significance of Ramp Meter Analysis*, summarizes the findings of the ramp meter analysis with the addition of initial project traffic to opening day. Under the Montecito-only scenario, the contribution of project traffic would not cause the delay at I-15 ramps to increase by more than two seconds at the I-15/Pomerado Road westbound-to-southbound ramp during the morning peak hour; thus, impacts would not be significant.

Opening Day with Project Buildout Ramp Meter Analysis

As shown by Table 4.6-13, the contribution of project traffic would not cause the delay at the I-15 ramps to increase by more than two seconds; thus, impacts would not be significant in the Opening Day with Project condition. the addition of traffic from Project Buildout would result in a significant cumulative impact at the I-15 westbound to southbound Miramar Road/Pomerado Road in the PM peak hour and at the I-15 eastbound to southbound Miramar Road/Pomerado Road in the AM peak hour.

 OPENING DAY I-15 FREEWAY SEGMENT ANALYSIS**Opening Day with Initial Project Freeway Segment Analysis (Montecito Only)**

Table 4.6-14, *Significance of Freeway Segment Analysis*, summarizes the findings of the freeway segment analysis with the addition of initial project traffic to opening day conditions. Under the Montecito-only scenario, the contribution of project traffic, significant impacts would not result on the analyzed segments. Table 4.6-14, summarizes the differences in freeway segment volume to capacity ratios. Six of seven segments between SR-163 and SR-56 will have LOS E or worse conditions under Opening Day conditions with or without the addition of Initial Project traffic. The Initial Project would result in volume to capacity ratio increases of between 0.000 and 0.003. The Traffic Impact Analysis has determined that the project would therefore not generate any significant traffic impacts on freeways.

Opening Day with Project Buildout Freeway Segment Analysis

As shown in Table 4.6-14, six of seven segments between SR-163 and SR-56 will have LOS E or worse conditions under Opening Day conditions with or without the addition of Project Buildout traffic. The Project at Buildout would result in volume to capacity ratio increases of between 0.000 and 0.009. The Traffic Impact Analysis has determined that the project would therefore not generate any significant traffic impacts on freeways.

Table 4.6-13
SIGNIFICANCE OF RAMP METER ANALYSIS

ASSUMING CALTRANS FLOW RATE							
LOCATION	PEAK	OPENING DAY WITHOUT PROJECT		OPENING DAY WITH INITIAL PROJECT DEVELOPMENT			SIGNIFICANT?
		MAX DELAY (MIN)	MAX QUEUE (V)	MAX DELAY (MIN)	ADDITIONAL DELAY	MAX QUEUE (V)	
1-15 SCRIPPS POWAY PARKWAY (NB)	AM	71	4,818	71	0	4,818	NO
	PM	4	282	4	0	282	NO
1-15 NB MIRA MESA BOULEVARD (EB)	AM	84	3,828	84	0	3,828	NO
	PM	117	8,254	117	0	8,254	NO
1-15 NB MIRA MESA BOULEVARD (WB)	AM	0	0	0	0	0	NO
	PM	80	3,780	80	0	3,780	NO
1-15 NB CARROLL CANYON ROAD	AM	0	0	0	0	0	NO
	PM	0	0	0	0	0	NO
1-15 NB MIRAMAR ROAD/POMERADO ROAD	AM	0	0	0	0	0	NO
	PM	0	0	0	0	0	NO
1-15 SCRIPPS POWAY PARKWAY (SB)	AM	25	2,881	25	0	2,881	NO
	PM	43	5,238	43	0	5,238	NO
1-15 SB MIRA MESA BOULEVARD (EB)	AM	35	5,078	35	0	5,078	NO
	PM	0	0	0	0	0	NO
1-15 SB MIRA MESA BOULEVARD (WB)	AM	59	3,527	59	1	3,528	NO
	PM	32	1,820	32	0	1,820	NO
1-15 SB CARROLL CANYON ROAD	AM	8	1,263	8	0	1,263	NO
	PM	0	0	0	0	0	NO
1-15 WB TO SB MIRAMAR ROAD/POMERADO ROAD	AM	3	509	3	2	511	NO
	PM	0	0	0	0	0	NO
1-15 EB TO SB MIRAMAR ROAD/POMERADO ROAD	AM	2	225	2	0	225	NO
	PM	100	8,032	100	0	8,032	NO

LOCATION	PEAK	OPENING DAY WITHOUT PROJECT		OPENING DAY WITH PROJECT			SIGNIFICANT?
		MAX DELAY (MIN)	MAX QUEUE (V)	MAX DELAY (MIN)	ADDITIONAL DELAY	MAX QUEUE (V)	
1-15 SCRIPPS POWAY PARKWAY (NB)	AM	71	4,818	71	0	4,818	NO
	PM	4	282	4	0	282	NO
1-15 NB MIRA MESA BOULEVARD (EB)	AM	84	3,828	84	0	3,828	NO
	PM	117	8,254	117	0	8,254	NO
1-15 NB MIRA MESA BOULEVARD (WB)	AM	0	0	0	0	0	NO
	PM	80	3,780	80	0	3,780	NO
1-15 NB CARROLL CANYON ROAD	AM	0	0	0	0	0	NO
	PM	0	0	0	0	0	NO
1-15 NB MIRAMAR ROAD/POMERADO ROAD	AM	0	0	0	0	0	NO
	PM	0	0	0	0	0	NO
1-15 SCRIPPS POWAY PARKWAY (SB)	AM	25	2,881	25	0	2,881	NO
	PM	43	5,238	43	0	5,238	NO
1-15 SB MIRA MESA BOULEVARD (EB)	AM	35	5,078	35	0	5,078	NO
	PM	0	0	0	0	0	NO
1-15 SB MIRA MESA BOULEVARD (WB)	AM	58	3,527	58	1.84	3,528	NO
	PM	32	1,820	32	1	1,821	NO
1-15 SB CARROLL CANYON ROAD	AM	8	1,263	8	1	1,264	NO
	PM	0	0	0	0	0	NO
1-15 WB TO SB MIRAMAR ROAD/POMERADO ROAD	AM	3	509	3	0	509	NO
	PM	0	0	0	0	0	NO
1-15 EB TO SB MIRAMAR ROAD/POMERADO ROAD	AM	2	225	2	0	225	NO
	PM	100	8,032	100	0	8,032	NO

LOCATION	PEAK	YEAR 2020 BUILDOUT WITHOUT PROJECT		BUILDOUT WITH PROJECT			SIGNIFICANT?
		MAX DELAY (MIN)	MAX QUEUE (V)	MAX DELAY (MIN)	ADDITIONAL DELAY	MAX QUEUE (V)	
1-15 NB MERCY ROAD	AM	81	5,284	81	0	5,284	NO
	PM	9	604	9	0	604	NO
1-15 NB MIRA MESA BOULEVARD (EB)	AM	78	4,538	78	0	4,538	NO
	PM	134	7,858	134	0	7,858	NO
1-15 NB MIRA MESA BOULEVARD (WB)	AM	0	0	0	0	0	NO
	PM	71	4,560	71	0	4,560	NO
1-15 NB CARROLL CANYON ROAD	AM	0	0	0	0	0	NO
	PM	0	0	0	0	0	NO
1-15 NB MIRAMAR ROAD/POMERADO ROAD	AM	0	0	0	0	0	NO
	PM	28	5,240	28	0	5,240	NO
1-15 SCRIPPS POWAY PARKWAY	AM	28	3,428	28	0	3,428	NO
	PM	53	6,444	53	0	6,444	NO
1-15 SB MIRA MESA BOULEVARD (EB)	AM	39	5,787	39	0	5,787	NO
	PM	8	1,152	8	0	1,152	NO
1-15 SB MIRA MESA BOULEVARD (WB)	AM	88	4,882	79	1.84	4,881	NO
	PM	40	2,383	40	3	2,418	NO
1-15 SB CARROLL CANYON ROAD	AM	13	2,383	14	1	2,430	NO
	PM	4	728	5	0	810	NO
1-15 WB TO SB MIRAMAR ROAD/POMERADO ROAD	AM	14	2,505	21	8	3,817	YES
	PM	0	0	0	0	0	NO
1-15 EB TO SB MIRAMAR ROAD/POMERADO ROAD	AM	32	2,834	32	0	2,834	NO
	PM	178	18,838	178	9	18,838	NO

Table 4.6-14
SIGNIFICANCE OF FREEWAY SEGMENT ANALYSIS

ROUTE	LIMITS	# LANES	OPENING DAY WITHOUT PROJECT		OPENING DAY WITH INITIAL DEVELOPMENT		DIFFERENCE IN VIC RATIO
			VIC RATIO	LOS	VIC RATIO	LOS	
Interstate 15	SR-56 - Poway Road	4	0.98	E	0.98	E	0.000
	Poway Road - Scripps Poway Parkway/Mercy Road	4	1.10	F(0)	1.10	F(0)	0.000
	Scripps Poway Parkway/Mercy Road - Mira Mesa Boulevard	4	1.20	F(0)	1.20	F(0)	0.000
	Mira Mesa Boulevard - Carroll Canyon Road	4	1.17	F(0)	1.17	F(0)	0.000
	Carroll Canyon Road - Pomerado Road	5	0.90	D	0.90	D	0.001
	Pomerado Road to Miramar Way	5	1.01	F(0)	1.01	F(0)	0.003
	Miramar Way to SR163	5	0.94	E	0.94	E	0.002
ROUTE	LIMITS	# LANES	OPENING DAY WITHOUT PROJECT		OPENING DAY WITH PROJECT		DIFFERENCE IN VIC RATIO
			VIC RATIO	LOS	VIC RATIO	LOS	
Interstate 15	SR-56 - Poway Road	4	0.98	E	0.98	E	0.000
	Poway Road - Scripps Poway Parkway/Mercy Road	4	1.10	F(0)	1.10	F(0)	0.000
	Scripps Poway Parkway/Mercy Road - Mira Mesa Boulevard	4	1.20	F(0)	1.20	F(0)	0.000
	Mira Mesa Boulevard - Carroll Canyon Road	4	1.17	F(0)	1.17	F(0)	0.001
	Carroll Canyon Road - Pomerado Road	5	0.90	D	0.90	D	0.002
	Pomerado Road to Miramar Way	5	1.01	F(0)	1.02	F(0)	0.009
	Miramar Way to SR163	5	0.94	E	0.94	E	0.008
ROUTE	LIMITS	# LANES	YEAR 2020 BUILDOUT WITHOUT PROJECT		YEAR 2020 BUILDOUT WITH PROJECT		DIFFERENCE IN VIC RATIO
			VIC RATIO	LOS	VIC RATIO	LOS	
Interstate 15	SR-56 - Poway Road	4	1.51	F(3)	1.51	F(3)	0.000
	Poway Road - Scripps Poway Parkway/Mercy Road	4	1.33	F(1)	1.33	F(1)	0.000
	Scripps Poway Parkway/Mercy Road - Mira Mesa Boulevard	4	1.33	F(1)	1.33	F(1)	0.000
	Mira Mesa Boulevard - Carroll Canyon Road	4	1.29	F(1)	1.29	F(1)	0.001
	Carroll Canyon Road - Pomerado Road	5	1.26	F(1)	1.26	F(1)	0.002
	Pomerado Road to Miramar Way	5	1.24	F(0)	1.25	F(0)	0.00990
	Miramar Way to SR163	5	1.24	F(0)	1.25	F(1)	0.00996

Lanes - Number of lanes in one direction: HOV - High Occupancy Lanes
 Capacity - Capacity in one direction
 ADT - Average Daily Traffic
 Peak Hour % - Percentage of average daily traffic occurring during the peak hour
 Direction Split - Percentage of peak hour traffic travelling in peak direction
 Truck Factor - Truck/terrain factor to represent influence of heavy vehicles and/or grades
 Peak Hour Volume - Peak hour traffic in peak direction of travel / For facilities with HOV lanes, ten percent is assumed to use HOV lanes.
 VIC - Volume to Capacity ratio
 LOS - Caltrans District 11 procedure was used to estimate the freeway level of service. Designations vary from A to F, with four levels of LOS F from F(0) to F(3).

BUILDOUT YEAR 2020**❑ BUILDOUT 2020 WITHOUT PROJECT TRAFFIC ROADWAY SEGMENT/ROADWAY CAPACITY ANALYSIS**

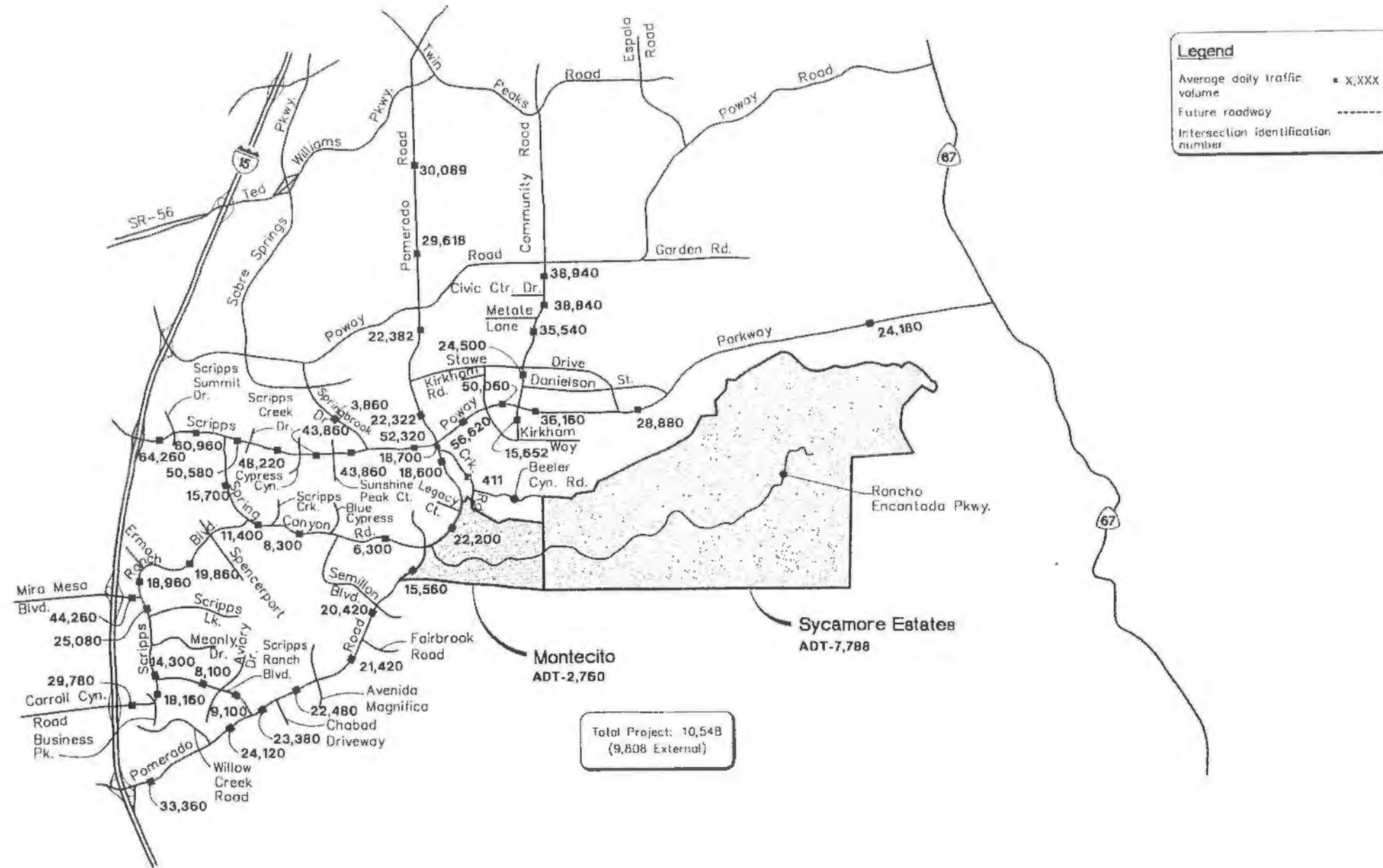
The ADT volumes for the buildout analysis were obtained from the SANDAG Series 9 model for the Year 2020. An analysis package developed by project's traffic engineer, KIMLEY-HORN AND ASSOCIATES, was used to calculate the future turning volumes based on the forecasted ADT, the existing ADT and the existing turning volumes. A full analysis of the Buildout Year 2020 conditions without the proposed Project is disclosed in the project's Traffic Report (see Appendix E of this EIR) Traffic volumes at opening day are shown in Figure 4.6-7, *Buildout 2020 without Project Daily Traffic Volumes*. Sixteen study area street segments and 16 study area intersections would operate at LOS E or F under either the AM or PM peak hour (or both) under Buildout 2020 conditions, without the introduction of Project traffic.

❑ BUILDOUT 2020 WITH PROJECT ANALYSIS**Buildout 2020 with Project Buildout Roadway Segment/Roadway Capacity Analysis**

Impacts from buildout of the proposed Project were added to the Buildout 2020 traffic volumes to determine the amount of impacts that the project would have at buildout. The resulting traffic volumes are shown in Figure 4.6-8, *Buildout 2020 with Project Daily Traffic Volumes*. Table 4.6-15, *Comparison of Buildout 2020 without Project and with Project Roadway Segment Analysis*, summarizes the effects of adding Project Buildout traffic to year 2020 condition. Based on the significance criteria previously outlined, the addition of Project Buildout traffic would have a significant cumulative impact on seven roadway segments that would operate at LOS E or F with or without the addition of Project Buildout traffic. The significant cumulative impacts are a direct result of changes in the volume to capacity ratio in excess of the established City threshold of 0.02. Specifically, the changes in the volume to capacity ratio for the applicable roadway segments that will experience significant cumulative impacts from the addition of Project Buildout traffic are:

- I-15 to Willow Creek (0.180 Change in V/C Ratio)
- Willow Creek Road to Scripps Ranch Boulevard (0.196 Change in V/C Ratio)
- Scripps Ranch Boulevard to Chabad Court (0.209 Change in V/C Ratio)
- Chabad Court to Avenida Magnifica (0.209 Change in V/C Ratio)
- Avenida Magnifica to Fairbrook Road (0.209 Change in V/C Ratio)
- Fairbrook Road to Semillon Boulevard (0.209 Change in V/C Ratio)
- Semillon Boulevard to Spring Canyon Road (0.209 Change in V/C Ratio)
- Legacy Point to Treadwell Road/Creek Road (0.267 Change in V/C Ratio)

In addition to the above segments, the addition of Project Buildout traffic to an existing LOS D condition at Scripps Poway Parkway between Spring Brook Drive and Pomerado Road would increase the V/C ratio by 0.02. The acceptable allowable increase is 0.02 seconds. The impact is viewed as



SOURCE: KIMLEY-HORN and ASSOCIATES

Figure 4.6-8
**BUILDOUT 2020 WITH
 PROJECT DAILY TRAFFIC VOLUMES**



Table 4.6-15
COMPARISON OF BUILDOUT 2020 WITHOUT PROJECT AND WITH PROJECT ROADWAY SEGMENT ANALYSIS

STREET	SEGMENT	BUILDOUT WITHOUT PROJECT V/C	BUILDOUT WITHOUT PROJECT LOS	BUILDOUT WITH PROJECT				
				V/C	LOS	CHANGE IN V/C	SIGNIFICANT? (Y/N)	
SCRIPPS POWAY PARKWAY	I-15 TO SCRIPPS SUMMIT DR.	1.068	F	1.071	F	0.003	NO	
	SCRIPPS SUMMIT DR. TO SPRING CANYON RD.	1.008	F	1.018	F	0.007	NO	
	SPRING CANYON TO SCRIPPS CREEK DR.	1.247	F	1.265	F	0.017	NO	
	SCRIPPS CREEK DR. TO CYPRESS CYN. RD.	1.054	F	1.072	F	0.017	NO	
	CYPRESS CYN. RD. TO SUNSHINE PEAK	0.927	E	0.975	E	0.047	NO	
	SUNSHINE PEAK TO SPRINGBROOK DR.	0.927	E	0.975	E	0.047	NO	
	SPRING BROOK DR. TO POMERADO RD.	0.851	D	0.872	D	0.021	YES	
	POMERADO RD. TO KIRKHAM RD.	0.928	E	0.944	E	0.016	NO	
	KIRKHAM RD. TO COMMUNITY RD.	0.821	C	0.834	D	0.013	NO	
	COMMUNITY RD. TO STOWE DR.	0.598	C	0.603	C	0.007	NO	
	STOWE DR. TO DANIELSON ST.	0.478	B	0.481	B	0.005	NO	
	DANIELSON ST. TO SR 67	0.398	A	0.403	A	0.005	NO	
	POMERADO ROAD	I-15 TO WILLOW CREEK RD.	2.044	F	2.224	F	0.180	YES
		WILLOW CRK. RD. TO SCRIPPS RANCH BLVD.	1.412	F	1.608	F	0.196	YES
SCRIPPS RANCH BLVD. TO CHABAD CT.		1.349	F	1.559	F	0.209	YES	
CHABAD CT. TO AVENIDA MAGNIFICA		1.289	F	1.489	F	0.209	YES	
AVENIDA MAGNIFICA TO FAIRBROOK RD.		1.219	F	1.429	F	0.209	YES	
FAIRBROOK RD. TO SEMILLON BLVD.		1.152	F	1.361	F	0.209	YES	
SEMILLON BLVD. TO SPRING CYN. RD.		0.835	D	1.044	F	0.209	YES	
SPRING CYN. RD. TO LEGACY PT.		1.139	F	0.555	C	0.000	NO	
LEGACY PT. TO TREADWELL CREEK RD.		0.973	E	1.240	F	0.267	YES	
TREADWELL CRK. RD. TO SCRIPPS POWAY PKWY.		0.362	A	0.468	B	0.105	YES	
METATE LANE TO POWAY RD.		0.548	C	0.560	C	0.012	NO	
POWAY RD. TO ROBISON BLVD.		0.717	C	0.740	C	0.024	NO	
COMMUNITY ROAD		POWAY RD. TO CIVIC CENTER DR.	0.958	E	0.974	E	0.015	NO
		CIVIC CENTER DR. TO METATE LANE	0.958	E	0.971	E	0.015	NO
	METATE LANE TO STOWE DR.	0.874	D	0.859	E	0.015	NO	
	STOWE DR. TO SCRIPPS POWAY PKWY.	0.603	C	0.613	C	0.010	NO	
	SCRIPPS POWAY PKWY. TO KIRKHAM WAY	0.519	C	0.522	C	0.003	NO	
	MIRA MESA BOULEVARD	I-15 TO SCRIPPS RANCH BLVD.	0.875	D	0.885	D	0.010	NO
SCRIPPS RANCH BOULEVARD		SPRING CANYON RD. TO ERMA RD.	0.487	B	0.497	B	0.029	NO
	ERMA RD. TO MIRA MESA BLVD.	0.445	B	0.474	B	0.029	NO	
	MIRA MESA BLVD. TO SCRIPPS LAKE DR.	0.588	C	0.627	C	0.029	NO	
	SCRIPPS LAKE DR. TO CARROLL CANYON RD.	0.343	A	0.358	A	0.015	NO	
	CARROLL CANYON RD. TO AVIARY DR.	0.198	A	0.203	A	0.005	NO	
	AVIARY DR. TO POMERADO RD.	0.223	A	0.228	A	0.005	NO	
	SPRING CANYON ROAD	SCRIPPS POWAY PKWY. TO SCRIPPS CREEK RD.	0.491	C	0.523	C	0.033	NO
		SCRIPPS CREEK RD. TO SEMILLON BLVD.	0.201	A	0.277	B	0.075	YES
	CARROLL CANYON ROAD	SEMILLON BLVD. TO POMERADO RD.	0.135	A	0.210	A	0.075	NO
		SCRIPPS RANCH BLVD. TO BUSINESS PARK AVE.	0.439	B	0.454	B	0.015	NO
SPRINGBROOK DRIVE	BUSINESS PARK AVE. TO I-15	0.727	C	0.745	C	0.017	NO	
	CREEK ROAD	SABRE SPRINGS PKWY. TO SCRIPPS POWAY PKWY.	0.231	A	0.257	A	0.026	NO
CREEK RD.		0.025	A	0.051	A	0.026	NO	

cumulative, but not significant, because an acceptable level of service would be maintained and as such, no mitigation is required for this segment. Similarly, the addition of project traffic to two additional segments (Pomerado Road, between Treadwell Creek Road and Scripps Poway Parkway and Spring Canyon Road, between Scripps Creek Drive and Semillon Boulevard) would cause a cumulative increase in the V/C ratio, but because an acceptable LOS B would be maintained along both segments, the impact is not regarded as significant and no mitigation would be required.

Buildout 2020 with Project Buildout Intersection Analysis

Table 4.6-16, *Comparison of Year 2020 without Project and with Project Intersection Analysis* depicts the findings of the Year 2020 with full Project Buildout intersection capacity analysis. As shown in this table, four intersections would be cumulatively impacted in Year 2020 with full Project Buildout. Of these four intersections, three would be regarded as cumulatively significant. These include:

- Scripps Poway Parkway/Pomerado Road (AM and PM peak hours)
- Pomerado Road/Willow Creek; and (AM and PM peak hours)
- Pomerado Road/Scripps Ranch Boulevard (AM peak hour)

At these three intersections, the addition of Full Buildout project traffic would contribute to existing LOS F conditions in the AM and PM peak hours. Impacts to the fourth intersection, Pomerado Road/Rancho Encantada Parkway, would not be regarded as significant because it would still operate at an acceptable level of service and mitigation would not be required for acceptable conditions. A significant direct impact would occur at two intersections:

- Pomerado Road/Scripps Ranch Boulevard (change from LOS D to LOS F, PM Peak Hour)
- Pomerado Road/I-15 Northbound Off-Ramp (change from LOS D to LOS E, AM Peak Hour)

□ YEAR 2020 CMP ANALYSIS WITH AND WITHOUT PROJECT BUILDOUT TRAFFIC

In conformance with the requirements of the CMP, peak hour arterial analysis was conducted for segments of Scripps Poway Parkway and Pomerado Road. As shown previously on Table 4.6-12, *Significance of CMP Analysis*, Scripps Poway Parkway and Pomerado Road would be characterized by good LOS D or better conditions in both directions of travel in Year 2020 without the addition of Project Buildout traffic, with the exception of LOS E conditions on Pomerado Road from I-15 to Treadwell Road westbound in the AM peak hour and on Pomerado Road from Treadwell Road to Ted Williams Parkway northbound in the PM peak hour. With the addition of Project Buildout traffic, significant cumulative impacts would occur to the following two Pomerado Road CMP segments:

- Treadwell Road to Ted Williams Parkway (change from LOS D to LOS E, AM Peak Hour)
- I-15 to Treadwell Road (change from LOS D to LOS F, PM Peak Hour)

SIGNALIZED INTERSECTIONS	OPENING DAY WITHOUT PROJECT				OPENING DAY WITH PROJECT							
	AM DELAY	AM LOS	PM DELAY	PM LOS	AM DELAY	AM LOS	CHANGE (s)	SIGNIFICANT?	PM DELAY	PM LOS	CHANGE (s)	SIGNIFICANT?
1. Poway Road/Community Road	13.9	B	17.9	C	15.8	C	1.9	NO	19.8	C	1.7	NO
2. Civic Center Drive/Community Road	17.3	C	19.7	C	19.8	C	2.3	NO	21.1	C	1.4	NO
3. Metate Lane/Community Road	9.1	B	9.3	B	9.3	B	0.2	NO	12.6	B	3.3	NO
4. Slows Drive/Community Road	12.9	B	15.1	C	15.1	C	2.2	NO	16.6	C	1.5	NO
5. Scripps Poway Parkway/Community Road	13.0	B	17.9	C	15.9	C	2.9	NO	33.6	D	15.9	YES
7. Scripps Poway Parkway/Scripps Summit Road	5.8	B	10.9	B	5.8	B	0.1	NO	11.1	B	0.2	NO
8. Scripps Poway Parkway/Spring Canyon Road	20.1	C	18.7	C	20.6	C	0.5	NO	19.2	C	0.5	NO
9. Scripps Poway Parkway/Scripps Creek Drive	17.7	C	15.3	C	19.0	C	1.3	NO	16.7	C	1.4	NO
10. Scripps Poway Parkway/Cypress Canyon Road	13.2	B	11.7	B	12.6	B	0.4	NO	12.2	B	0.5	NO
11. Scripps Poway Parkway/Sunshine Peak	9.0	B	8.3	B	8.2	B	0.2	NO	8.6	B	0.3	NO
12. Scripps Poway Parkway/Springbrook Drive	18.1	C	18.7	C	18.1	C	1.0	NO	19.5	C	0.8	NO
13. Scripps Poway Parkway/Pomero Road	18.7	C	23.0	C	22.4	C	3.7	NO	25.6	D	2.8	YES
14. Scripps Poway Parkway/Kirkham Road	19.2	C	7.3	B	24.2	C	5.0	YES	9.6	B	2.5	NO
15. Scripps Poway Parkway/Slows Drive	10.2	B	9.7	B	10.2	B	0.0	NO	9.7	B	0.0	NO
16. Scripps Poway Parkway/Danielson Street	10.4	B	8.2	B	10.4	B	0.0	NO	8.2	B	0.0	NO
17. Pomero Road/Wlow Creek	*	F	*	F	*	F	7.88%	YES	*	F	7.95%	YES
18. Pomero Road/Scripps Ranch Boulevard	*	F	*	F	*	F	10.64%	YES	*	F	11.38%	YES
19. Pomero Road/Chabad Court	9.1	B	9.4	B	12.2	B	3.1	NO	11.3	B	1.8	NO
20. Pomero Road/Avenida Magnifica	22.9	C	19.1	C	24.8	C	1.90	NO	21.9	C	3.8	NO
21. Pomero Road/Fairbrook Road	9.5	B	11.5	B	10.7	B	4.2	NO	12.1	B	0.6	NO
22. Pomero Road/Samilton Boulevard	9.8	B	12.4	B	10.3	B	0.6	NO	12.8	B	0.4	NO
23. Spring Canyon/Pomero Road	14.8	B	18.6	C	19.4	C	4.6	YES	28.2	D	9.6	YES
24. Pomero Road/Lacey Point	7.9	B	13.1	B	10.7	B	2.6	NO	16.7	C	2.5	NO
25. Pomero Road/Creek Road	17.9	C	11.4	B	21.5	C	3.6	NO	16.4	C	5.0	YES
26. Spring Canyon Road/Blue Cypress Drive	18.0	C	5.8	B	17.8	C	1.8	NO	8.1	B	0.3	NO
27. Scripps Ranch Boulevard/Spring Canyon Road	20.2	C	8.5	B	24.1	C	3.8	NO	9.2	B	0.7	NO
28. Scripps Ranch Boulevard/Farmingdale	11.1	B	9.1	B	11.0	B	0.5	NO	9.2	B	0.1	NO
29. Scripps Ranch Boulevard/Ema Road	19.4	C	11.9	B	23.2	C	3.0	NO	12.1	B	0.2	NO
30. Scripps Ranch Boulevard/Mira Mesa Boulevard	71.8	F	12.8	B	*	F	2.45%	YES	13.1	B	0.3	NO
31. Scripps Ranch Boulevard/Hobert Road	13.8	B	24.7	C	14.7	B	0.8	NO	28.0	D	1.3	NO
32. Scripps Ranch Boulevard/Scripps Lake Drive	22.0	C	19.3	C	22.9	C	0.9	NO	19.8	C	0.5	NO
33. Scripps Ranch Boulevard/Marinky Drive	10.3	B	14.5	B	10.5	B	0.2	NO	14.8	B	0.3	NO
34. Scripps Ranch Boulevard/Scripps Ranch Court	17.8	C	18.3	C	18.6	C	0.8	NO	18.5	C	0.3	NO
35. Mira Mesa Boulevard-15 NB Off Ramp	15.3	C	38.4	D	15.8	C	0.3	NO	40.5	E	1.1	NO
36. Mira Mesa Boulevard-15 SB Off Ramp	30.2	D	14.2	B	31.9	D	1.70	NO	14.4	B	0.2	NO
37. Carrol Canyon Road-15 NB Off Ramp	45.3	E	15.6	C	46.9	E	1.6	NO	15.6	C	0.0	NO
38. Carrol Canyon Road-15 SB Off Ramp	65.4	F	47.0	E	*	F	0.60%	NO	48.5	E	1.5	NO
39. Pomero Road-15 NB Off Ramp	11.2	B	9.5	B	14.6	B	3.3	NO	12.4	B	2.9	NO
40. Pomero Road-15 SB Off Ramp	32.4	D	12.2	B	33.2	D	0.8	NO	12.9	B	0.7	NO
41. Scripps Poway Parkway-15 NB Off Ramp	31.4	D	25.4	D	32.5	D	1.1	NO	25.6	D	0.4	NO
42. Scripps Poway Parkway-15 SB Off Ramp	13.4	B	21.0	C	13.4	B	0.0	NO	21.2	C	0.2	NO
43. Carrol Canyon Road/Business Park	15.2	C	18.6	C	15.5	C	0.3	NO	18.5	C	0.2	NO
44. Poway Road/Babers Springs Parkway	16.7	C	25.0	C	19.1	C	0.4	NO	26.5	D	1.5	NO
45. Pomero Road/Rancho Encantada Parkway	0.1	A	0.1	A	11.5	B	11.4	YES	14.2	B	14.1	YES
46. Pomero Road/Slows Drive	9.6	B	9.1	B	10.0	B	0.5	NO	10.2	B	1.1	NO
47. Pomero Road/Old Pomero Road	11.5	B	11.4	B	11.7	B	0.2	NO	12.5	B	1.4	NO
48. Pomero Road/Metate Lane	12.3	B	9.8	B	13.0	B	0.7	NO	12.9	B	3.1	NO
49. Pomero Road/Out Knoll Road	13.1	B	13.8	B	13.8	B	0.7	NO	15.3	C	1.4	NO
50. Pomero Road/Poway Road	18.4	C	24.8	C	17.3	C	0.9	NO	20.2	D	1.8	NO
51. Pomero Road/8th Street	13.4	B	7.5	B	13.5	B	0.1	NO	8.0	B	0.5	NO
52. Pomero Road/Meadowbrook Lane	13.7	B	7.3	B	14.0	B	0.3	NO	7.7	B	0.4	NO
53. Pomero Road/Olen Oak Road	9.3	B	9.3	B	9.7	B	0.4	NO	9.7	B	0.4	NO
54. Pomero Road/Ted Williams Parkway	15.1	C	18.8	C	18.2	C	1.1	NO	17.1	C	0.6	NO

SOURCE: KIMLEY-HORN and ASSOCIATES

Table 4.6-16
COMPARISON OF YEAR 2020 WITHOUT PROJECT
AND WITH PROJECT INTERSECTION ANALYSIS

☐ **YEAR 2020 RAMP METER ANALYSIS WITH AND WITHOUT PROJECT BUILDOUT TRAFFIC**

Table 4.6-13, *Significance of Ramp Meter Analysis*, summarizes the findings of the ramp meter analysis. As shown by the Table, the addition of Project Buildout traffic to Year 2020 conditions would result in a significant cumulative impact at the I-15 westbound to southbound Miramar Road/Pomerado Road in the PM peak hour and at the I-15 eastbound to southbound Miramar Road/Pomerado Road in the AM peak hour.

☐ **YEAR 2020 FREEWAY SEGMENT ANALYSIS WITH AND WITHOUT PROJECT BUILDOUT TRAFFIC**

Table 4.6-14, *Significance of Freeway Segment Analysis*, summarizes the findings of the freeway segment analysis with the addition of Project Buildout traffic to Year 2020 conditions. As shown in Table 4.6-14, all seven of the studies segments between SR-163 and SR-56 will have LOS E or worse conditions under Year 2020 conditions with or without the addition of Project Buildout traffic. The Project at Buildout would result in volume to capacity ratio increases of between 0.000 and 0.00996. The Traffic Impact Analysis has determined that the project would therefore not generate any significant traffic impacts on freeways.

☐ **YEAR 2020 BUILDOUT ANALYSIS WITH STREET “B” AS EMERGENCY ONLY ACCESS**

The traffic impact analysis indicates that approximately 3 percent of the Project’s externally-oriented traffic would proceed to Pomerado Road via Street “B” which is proposed to connect with Beeler Canyon Road/Creek Road. Without the Street “B” connection, the traffic utilizing this access would have to be shifted to Rancho Encantada Parkway. Peak hour capacity analysis was conducted at the Pomerado Road intersections with Creek Road, Legacy Point, and Rancho Encantada Parkway. The analysis is indicated in the following table.

Table 4.6-1617
YEAR 2020 BUILDOUT WITH AND WITHOUT STREET “B”

BUILDOUT WITH PROJECT										
Intersection	With Street “B”				Without Street “B”					
	Delay	LOS	Delay	LOS	Delay	LOS	Difference in Delay With & Without Beeler Canyon Rd	Delay	LOS	Difference in Delay With & Without Beeler Canyon Rd
Pomerado/Creek	18.2	C	14.0	B	18.4	C	0.2	14.7	B	0.7
Pomerado/Creek	12.4	B	19.8	C	13.1	B	0.7	20.7	C	0.9
Pomerado/Rancho Encantada Pkwy.	17.0	C	13.3	B	17.4	C	0.4	13.5	B	0.2

In comparing the two conditions shown in the table, there would be no signification increase in intersection delay and LOS under the Buildout with Project without Street “B” condition.

CONSTRUCTION TRAFFIC

Temporary construction-related traffic would occur throughout the grading and construction phases of Project buildout. Haul trucks associated with the grading operation would not occur on the existing public street system, because cut and fill is anticipated to be balanced on the site. Construction traffic would consist of contractor employees and trucks hauling construction materials. Construction traffic would typically occur during off-peak hours. In addition, temporary construction-related traffic disruptions would be minimized through standard traffic controls; thus, impacts are not considered significant. The ADT volume associated with construction traffic would be substantially lower than the ADT volume of the proposed Project at buildout and would therefore have lesser impacts from a traffic perspective.

4.6.3 SIGNIFICANCE OF IMPACTS

The proposed Project would have significant direct and cumulative impacts on study area roadway segments, intersections, CMP segments and freeway ramps.

4.6.4 MITIGATION, MONITORING AND REPORTING PROGRAM

With implementation of the following mitigation measures, impacts would be reduced to below a level of significance with the exception of direct and cumulative impacts to Pomerado Road, which would remain significant and unmitigated.

The following measures are required of both the Montecito and Sycamore Estates sub-projects:

- 4.6-1: Prior to recordation of the first final map, the owner/permittee shall assure the construction of Pomerado Road from Spring Canyon Road to north of Legacy Road as a modified four-lane major street with appropriate transitions, satisfactory to the City Engineer.
- 4.6-2: Prior to recordation of the first final map, the owner/permittee shall assure the construction of a traffic signal at the intersection of Rancho Encantada Parkway and Pomerado Road, satisfactory to the City Engineer.
- 4.6-3: Prior to recordation of the first final map, the owner/permittee shall assure the construction of a northbound right-turn lane and a southbound left-turn lane at the intersection of Rancho Encantada Parkway and Pomerado Road, satisfactory to the City Engineer.
- 4.6-4: Prior to recordation of the first final map, the owner/permittee shall assure the construction of a traffic signal at the intersection of Pomerado Road and Stonemill Drive, satisfactory to the City Engineer.
- 4.6-5: Prior to recordation of the first final map, the owner/permittee shall assure the construction of an additional northbound left-turn lane and an additional westbound left-turn lane at the intersection of Scripps Poway Parkway and Pomerado Road, satisfactory to the City Engineer.
- 4.6-6: Prior to recordation of the first final map, the owner/permittee shall assure the construction of

an additional lane for the northbound off-ramp at I-15 and Pomerado Road, satisfactory to the City Engineer.

- 4.6-7: Prior to recordation of the first final map, the owner/permittee shall assure by permit and bond the construction of an additional lane along Pomerado Road between the U.S. Navy/Marine driveway and the USIU secondary driveway to improve the eastbound merging for the I-15 northbound off-ramp, satisfactory to the City Engineer.
- 4.6-8: Prior to recordation of the first final map, ~~and as an alternative to the owner/permittee shall assure~~ the construction of a High Occupancy Vehicle Lane (HOV) at I-15 and Pomerado Road westbound to southbound on-ramp, ~~satisfactory to the City Engineer. the owner/permittee shall contribute an equivalent cost (estimated as \$500,000.00) of the proposed on-ramp widening to the improvement program proposed by Caltrans, specifically the southbound auxiliary lane on I-15 from Mira Mesa Blvd. to Miramar Way.~~
- 4.6-9: Prior to recordation of the first final map, the owner/permittee shall assure by permit and bond the construction of a traffic signal at the intersection of Spring Canyon Road with Spruce Run Drive, Semillon Boulevard and Scripps Creek Drive, satisfactory to the City Engineer.
- 4.6-10: Prior to recordation of the first final map, the owner/permittee shall assure by permit and bond the construction of median improvements at the intersection of Spring Canyon Road with Semillon Boulevard, Sunset Ridge Drive, Scripps Creek Drive, Spruce Run Drive, Blue Cypress, and other locations along Spring Canyon Road needed to reduce cut-thru traffic on local collector streets in the Scripps Miramar Ranch community, satisfactory to the City Engineer.
- 4.6-11: Prior to recordation of the first final map, the owner/permittee shall assure the construction of a traffic signal interconnect system on Spring Canyon Road between Scripps Ranch Boulevard and Pomerado Road, satisfactory to the City Engineer.

4.7 NOISE

Sound is mechanical energy transmitted by pressure waves in a compressible medium, such as air. Noise is defined as unwanted sound. A noise study was conducted for the proposed Project by Giroux & Associates, titled *Noise Impact Analysis, Rancho Encantada* (dated September 26, 2000). The complete report is included as Appendix F to this EIR. The discussion below summarizes the results of the noise study.

4.7.1 EXISTING CONDITIONS

□ NOISE CRITERIA

The unit of sound pressure ratioed to the pressure created by the faintest sound detectable to a young person with keen auditory acuity is called a decibel (dB). Because sound or noise can vary in intensity by over one million times within the range of human hearing, a logarithmic ratio is used to keep sound pressure level values at a convenient and manageable level. Because the human ear is not equally sensitive to all sound frequencies within the entire spectrum, noise levels at maximum human sensitivity are factored more heavily into sound descriptions in a process called "A-weighting" written as dB(A). Any further reference to decibels written as "dB" should be understood to be A-weighted.

Time variations in noise exposure are typically expressed in terms of a steady-state energy level equal to the energy content of the time varying period (called L_{eq}), or alternately, as a statistical description of the sound level that is exceeded over some fraction of a given observation period. Because community receptors are more sensitive to unwanted noise intrusion during the evening and at night, state law requires that, for planning purposes, an artificial dB increment be added to quiet time noise levels in a 24-hour noise descriptor called the Community Noise Equivalent Level (CNEL).


The City of San Diego requires that community noise levels be presented in terms of CNEL as set forth in the Transportation Element of the City of San Diego Progress Guide and General Plan (see Table 4.7-1, *City of San Diego Noise Land Use Compatibility Chart*). Those guidelines require an exterior CNEL of 65 dB for residential uses, schools and parks.


An interior CNEL of 45 dB is mandated for multiple family dwellings, and is considered a desirable interior noise exposure for single family dwelling units as well. Structural attenuation of noise from the exterior to interior is found in standard construction practice to be 15 dB. An exterior noise exposure of 60 dB CNEL or less thus usually allows the 45 dB CNEL interior standard to be met with no additional effort.

When exterior noise levels exceed 60 dB CNEL, a study is normally required to determine what additional noise attenuation measures, if any, are needed to insure a sub-45 dB CNEL interior level. Such a study is mandatory for multiple occupancy dwellings (State Building Code, Chapter 2-35). The City of San Diego, as a matter of policy, also requires documentation that the 45 dB CNEL interior standard will be met for all single-family developments. In practice, a noise reduction of 15 dB can be

**Table 4.7-1
CITY OF SAN DIEGO NOISE LAND USE COMPATIBILITY CHART**

Land Use	Annual Community Noise Equivalent Level in Decibels						
	45	50	55	60	65	70	75
1. Outdoor Amphitheaters (may not be suitable for certain types of music)	Compatible	Compatible	Compatible	Incompatible	Incompatible	Incompatible	Incompatible
2. Schools, Libraries	Compatible	Compatible	Compatible	Incompatible	Incompatible	Incompatible	Incompatible
3. Nature Preserves, Wildlife Preserves	Compatible	Compatible	Compatible	Incompatible	Incompatible	Incompatible	Incompatible
4. Residential-Single Family, Multiple Family, Mobile Homes, Transient Housing	Compatible	Compatible	Compatible	Incompatible	Incompatible	Incompatible	Incompatible
5. Retirement Home, Intermediate Care Facilities, Convalescent Homes	Compatible	Compatible	Compatible	Incompatible	Incompatible	Incompatible	Incompatible
6. Hospitals	Compatible	Compatible	Compatible	Incompatible	Incompatible	Incompatible	Incompatible
7. Parks, Playgrounds	Compatible	Compatible	Compatible	Incompatible	Incompatible	Incompatible	Incompatible
8. Office Buildings, Business and Professional	Compatible	Compatible	Compatible	Incompatible	Incompatible	Incompatible	Incompatible
9. Auditoriums, Concert Halls, Indoor Arenas, Churches	Compatible	Compatible	Compatible	Incompatible	Incompatible	Incompatible	Incompatible
10. Riding Stables, Water Recreation Facilities	Compatible	Compatible	Compatible	Incompatible	Incompatible	Incompatible	Incompatible
11. Outdoor Spectator Sports, Golf Courses	Compatible	Compatible	Compatible	Incompatible	Incompatible	Incompatible	Incompatible
12. Livestock Farming, Animal Breeding	Compatible	Compatible	Compatible	Incompatible	Incompatible	Incompatible	Incompatible
13. Commercial-Retail, Shopping Centers, Restaurants, Movie Theaters	Compatible	Compatible	Compatible	Incompatible	Incompatible	Incompatible	Incompatible
14. Commercial-Wholesale, Industrial Manufacturing, Utilities	Compatible	Compatible	Compatible	Incompatible	Incompatible	Incompatible	Incompatible
15. Agriculture (except Livestock), Extractive Industry, Farming	Compatible	Compatible	Compatible	Incompatible	Incompatible	Incompatible	Incompatible
16. Cemeteries	Compatible	Compatible	Compatible	Incompatible	Incompatible	Incompatible	Incompatible

 **Compatible** - The average noise level is such that indoor and outdoor activities associated with the land use may be carried out with essentially no interference from noise.

 **Incompatible** - The average noise level is so severe that construction costs to make the indoor environment acceptable for performance of activities would probably be prohibitive. The outdoor environment would be intolerable for outdoor activities associated with the land use.

Source: Progress Guide and General Plan (Transportation Element)

achieved with little additional structural noise reduction design. Exterior levels of up to 60 dB CNEL can therefore be accommodated in meeting the interior standard. A noise level of 65 dB CNEL is the threshold where noise interferes noticeably with an ability to carry on a quiet conversation.

□ EXISTING NOISE LEVELS

Existing noise levels in the *Rancho Encantada* project area are very low due to the semi-rural land development pattern in the project vicinity. Traffic noise, except along the western property boundary of the Montecito sub-project site, very close to Pomerado Road, is not perceptible, particularly because variable terrain shields the site interior from exterior noise sources. In part due to the semi-rural development pattern and the proximity of the project site to the Marine Corps Air Station (MCAS) Miramar, aircraft noise is audible. Although some take-offs are made eastward, passing south of *Rancho Encantada*, most air traffic closest to the project site is in the landing pattern with lower engine power settings. There are no formally "adopted" aircraft noise contours for the base conversion to USMC aviation, but the current contours have not changed appreciably from U.S. Navy aviation activities early in the previous decade. Figure 4.7-1 shows the predicted noise contours contained in the DEIR/DEIS for the Miramar base conversion. The contour shape/location closest to *Rancho Encantada* are almost identical to historical Navy flight activities' contours. The 60 dB CNEL contour, a noise level that would trigger a noise mitigation analysis requirement under City of San Diego guidelines, is well within the base property, and is not within the *Rancho Encantada* project boundaries.

4.7.2 IMPACT ANALYSIS

Three noise concerns are typically identified with land use development such as that proposed for the project area: 1) construction activities, especially heavy equipment, which could create short-term noise increases near the project site; 2) the increase in project-related traffic which could cause an incremental increase in area-wide noise levels; and 3) elevated future ambient levels from adjacent arterial roadways that could place possible constraints on siting noise-sensitive uses on the project site. One additional impact, aircraft noise, is also considered for the *Rancho Encantada* project.

Issue 1: *Would the proposed project expose people to short-term construction-related noise levels which exceed the City's standards?*

Significance Criteria

Short-term construction-related noise impacts would be regarded as significant if noise levels would impact existing land uses above the noise levels specified in the City of San Diego Noise Land Use Compatibility Chart (see Table 4.7-1). Impacts also would be considered significant if construction noise violated the City of San Diego's Noise Ordinance for construction or grading (Section 59.5.0404 of the City of San Diego's Municipal Code). Construction noise impacts for the off-site gravity sewer

design option would be considered significant if construction noise violated the City of Poway's Noise Ordinance (Chapter 8.06 of the City of Poway's Municipal Code).

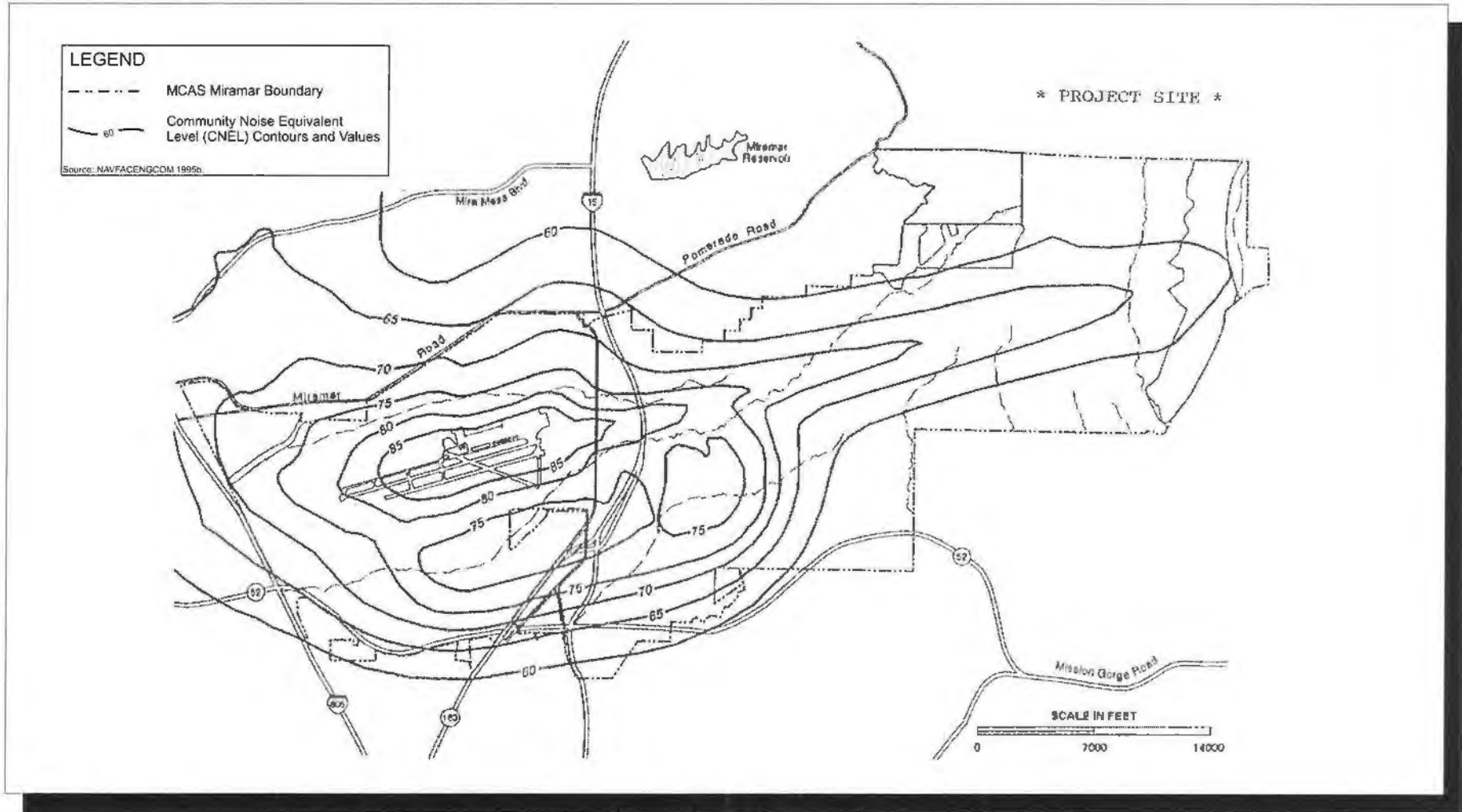
Impact Analysis

Temporary construction noise impacts would occur from project implementation. Short-term construction noise impacts tend to occur in discrete phases dominated initially by site clearing and grading, then by foundation construction, and finally for finish construction. The earth-moving (grading) activities are the greatest source of noise during construction with equipment noise ranging from 75 to 90 dB(A) at 50 feet from the source. Short-term construction noise impacts also would occur off-site along a proposed sewer line alignment, if the gravity sewer design option is implemented.

Spherically radiating point sources of noise emissions are atmospherically attenuated by a factor of 6 dB per doubling of distance. The quieter construction noise sources would, therefore, drop below 60 dB by about 300 feet from the source while the loudest sources could still be detectable above the local background beyond 1,000 feet from the construction area. With hilly topography in the project vicinity, the terrain shielding effects would limit the noise envelope around the construction site to considerably less than its theoretical maximum.

Construction noise sources are not strictly relatable to a noise standard because they occur only during selected times and the source strength varies sharply with time. The penalty associated with noise disturbance during quiet hours and the nuisance factor accompanying such disturbance usually leads to time limits on grading activities imposed as conditions on grading permits. The weekday (including Saturday) hours from 7 a.m. to 7 p.m. are the times allowed in the City of San Diego's and the City of Poway's Noise Ordinances for construction or grading. Section 59.5.0404 of the City of San Diego's Municipal Code and Chapter 8.08.100 of the City of Poway's Municipal Code also contain performance standards that limit the allowable noise from construction at the property line of any adjacent residential uses. The City of San Diego Municipal Code states that the allowable average noise exposure during the permissible 12-hour construction "window" is 75 dB. The City of Poway Municipal Code states that no construction equipment shall be operated so as to cause noise at a level in excess of 75dB for more than eight hours during any twenty-four-hour period when measured at or within residential property lines. Measurements have shown that this standard is not normally exceeded off-site from a construction project.

Although City of San Diego and City of Poway noise standards would likely not be exceeded at the nearest residences, heavy equipment operations and construction activities may create a temporary nuisance when the distance buffer between the source and the receiver is small. This would occur mostly at the interface between the first tier of already completed homes and those under construction, or in areas where the off-site sewer line would be installed near existing residential homes. Because such activities are constrained to hours of least sensitivity, last only a limited amount of time, and must comply with the noise performance standard in the City of San Diego or City of Poway Municipal Code, such temporary nuisance effects are considered adverse, but not significant.



**Figure 4.7-1
MCAS MIRAMAR
AIRCRAFT NOISE CONTOURS**



Significance of Impacts

Construction noise impacts would be temporary in nature and less than significant. The Project would be required to comply with the City of San Diego's Noise Ordinance which states that all construction and general maintenance activities, except in an emergency, shall be limited to the hours of 7 a.m. to 7 p.m. Monday through Saturday. Construction of the off-site gravity sewer line would be required to comply with the City of Poway's Noise Ordinance. These standard City requirements would be included as conditions of all grading and construction permits.

Mitigation, Monitoring and Reporting Program

Short-term construction related noise impacts would not be significant; therefore, no mitigation is required.

Issue 2: *Would the proposed project expose people and biological resources to future traffic related noise levels that exceed City standards?*

Significance Criteria

Development-related noise impacts would be regarded as significant if any of the following would occur as a result of project implementation:

- a. If Project-generated traffic would increase existing vehicular noise levels along public or private roadways by 3dB CNEL or greater.
- b. If noise levels at any usable outdoor space exceed 65 dB CNEL (for residential, school and park uses as specified in the City of San Diego Noise Land Use Compatibility Chart; see Table 4.7-1); or if interior residential noise levels exceed 45 dB CNEL.

Impact Analysis

DEVELOPMENT-RELATED VEHICULAR NOISE IMPACTS

This analysis focuses on increases in off-site traffic-related noise that would result from implementation of the Project as described in Chapter 3.0, PROJECT DESCRIPTION. Long term noise concerns from the increased urbanization of the project area center primarily on mobile source emissions surrounding the project site. These concerns were addressed using the federal highway noise prediction model (FHWA-RD-77-108). Traffic noise levels for existing conditions and for five additional traffic scenarios, are shown in Table 4.7-2, *Rancho Encantada Traffic Noise Levels*. Maximum Project-related impacts would be 2 dB along any roadway segment analyzed. These increases would occur along roadways closest to the project site (Pomerado or Spring Canyon Roads). Farther from the site, as Project traffic becomes progressively diluted, noise increases are 0-1 dB.

None of the Project-related noise increases equal or exceed the +3 dB CNEL increase considered an individually potentially significant noise impact.

Table 4.7-2
RANCHO ENCANTADA TRAFFIC NOISE LEVELS
 (CNEL in dBA @ 100 feet to Centerline)

ROADWAY/SEGMENT	EXISTING CONDITION	OPENING DAY	OPENING DAY	OPENING DAY	BUILDOUT	BUILDOUT
		NO PROJECT	INITIAL PROJECT	WITH PROJECT	NO PROJECT	WITH PROJECT
Scripps Poway Parkway:						
I-15 - Scripps Summit Dr.	67	68	68	68	71	71
Scripps Summit Dr. - Spring Cyn. Rd	67	68	68	68	71	71
Spring Canyon - Scripps Creek Dr.	67	67	67	67	70	70
Scripps Creek Dr. - Cypress Cyn. Rd.	67	67	67	67	70	70
Cypress Cyn. Rd. - Sunshine Pk	67	67	67	67	70	70
Sunshine Peak - Springbrook Dr	67	67	67	67	70	70
Springbrook Dr - Pomerado Rd	68	68	68	68	70	71
Pomerado Road - Kirkham Rd	69	69	69	69	71	71
Kirkham Road - Community Rd	68	68	68	68	70	70
Community Road - Stowe Drive	66	66	66	66	69	69
Stowe Drive - Danielson Street	66	66	66	66	68	68
Danielson Street - SR-67	66	66	66	66	67	67
Pomerado Road						
I-15 to Willow Creek Rd	68	68	68	68	68	69
Willow Crk Rd to Scripps Ranch Blvd	66	67	67	67	67	67
Scripps Ranch Blvd to Chabad Court	66	66	67	67	66	67
Chabad Court to Avenida Magnifica	66	66	66	67	66	67
Avenida Magnifica to Fairbrook Rd	66	66	66	67	66	67
Fairbrook Rd to Semillon Blvd	66	66	66	66	66	66
Semillon Blvd to Spring Canyon Rd	64	64	64	65	64	65
Spring Canyon Rd to Legacy Point	64	64	64	65	66	67
Legacy Point to Treadwell/Crk Rd	63	63	64	65	65	66
Treadwell/Crk Rd to Scripps Pwy Pkwy	64	65	65	66	65	66
Metate Ln to Poway Rd	66	66	66	66	67	67
Poway Rd to Robison Blvd	67	67	67	67	68	68
Community Road						
Poway Rd to Civic Center Dr	67	67	67	67	69	69
Civic Center Dr to Metate Lane	66	67	67	67	69	69
Metate Lane to Stowe Drive	66	66	66	66	69	69
Stowe Drive to Scripps Poway Pkwy	65	66	66	66	67	67
Scripps Poway Pkwy to Kirkham Wy	62	63	63	63	65	65
Mira Mesa Blvd						
I-15 to Scripps Ranch Blvd	69	69	69	69	70	70

ROADWAY/SEGMENT	EXISTING CONDITION	OPENING DAY	OPENING DAY	OPENING DAY	BUILDOUT	BUILDOUT
		NO PROJECT	INITIAL PROJECT	WITH PROJECT	NO PROJECT	WITH PROJECT ¹
Scripps Ranch Blvd						
Spring Cyn Rd to Erma Rd	64	64	64	65	65	65
Erma Rd to Mira Mesa Blvd	64	65	65	65	65	65
Mira Mesa Blvd to Scripps Lake Dr	66	66	66	67	67	67
Scripps Lake Dr to Carroll Canyon Rd	64	64	64	65	65	65
Carroll Canyon Rd to Aviary Dr	62	62	62	62	62	62
Aviary Dr to Pomerado Rd	62	62	62	62	63	63
Spring Canyon Road						
Scripps Poway Pkwy to Scripps Creek Rd	61	61	62	62	64	64
Scripps Creek Rd to Semillon Blvd	58	59	59	61	61	63
Semillon Blvd to Pomerado Rd	57	58	58	60	59	61
Carroll Canyon Road						
Scripps Ranch Blvd to Business Park Ave	—	—	—	—	66	66
Business Park Ave to I-15	—	—	—	—	68	68
Springbrook Drive						
Sabre Springs Pkwy to Scripps Pwy Pkwy	58	58	58	59	59	59
Creek Road						
West of Beeler Canyon Road	50	51	51	51	58	58
Rancho Encantada Parkway (note: PA = Planning Area)						
Pomerado Road to PA 1/1a	33	33	58	63	33	63
PA 1/1a to PA 2/2a	33	33	55	63	33	63
PA 2/2a to PA 3/3a	33	33	50	63	33	63
PA 3/3a to PA 9	33	33	33	62	33	62
PA 9 to PA 8	33	33	33	62	33	62
PA 8 to PA 7a	33	33	33	61	33	61
PA 7a to PA 10	33	33	33	61	33	61
PA 1 to PA 11 access	33	33	33	59	33	59
East of PA 11 access	33	33	33	33	33	33

Source: Giroux & Associates, September 26, 2000

1 If proposed Street "B" was available for emergency-only traffic, an additional three percent of Project traffic would be directed to Rancho Encantada Parkway, incrementally increasing noise levels, but not beyond the values indicated by this table.

□ ON-SITE NOISE IMPACTS - MONTECITO SUB-PROJECT

The yards of the first tier of homes backing up to Pomerado Road on the Montecito-sub-project site are not within the 100-foot to centerline, 65 dB CNEL contour distance at area buildout shown in Table 4.7-2. Because the first set of homes closest to the roadway would shield and protect any interior units, impacts to homes other than those closest to the roadway would not be significantly impacted. At one hundred feet from the Pomerado Road centerline, the buildout noise level is calculated to be 67 dB CNEL. The yards of the first tier of homes backing up to Pomerado Road are not proposed to be any less than 200 feet from the Pomerado Road centerline. At 200 feet, the exterior noise exposure would be 62 dB CNEL which does not require exterior noise mitigation. The westernmost tier of residential lots in Planning Areas 1 and 1A would be required to meet interior noise standards of 45 dB. With

standard construction having an interior noise reduction value of 15 dB, interior noise for homes located at 200 feet from the Pomerado Road centerline would therefore exceed City standards, resulting in a significant impact. The first set of homes closest to the roadway would protect any interior units such that any interior noise mitigation would apply only to the first tier of homes near the roadway.

Traffic noise within the Montecito sub-project from vehicles traveling on Rancho Encantada Parkway would be approximately 63 dB at 100 feet from the centerline. If located closer than 80 feet from the Rancho Encantada Parkway centerline, exterior noise levels have the potential to increase to 65 dB to 68 CNEL (at 50 feet from the centerline). For any residential lot proposed by the Montecito PRD that would be located closer than 80 feet from the Rancho Encantada Parkway centerline, potentially significant exterior and interior noise impacts would occur. As Rancho Encantada Parkway traverses the site to the east, the noise level would progressively decrease as the traffic levels decline.

□ ON-SITE NOISE IMPACTS - SYCAMORE ESTATES SUB-PROJECT

Traffic noise within the Sycamore Estates sub-project from vehicles traveling on the western segment of Rancho Encantada Parkway would be approximately 63 dB at 100 feet from the centerline. If located closer than 80 feet from the Rancho Encantada Parkway centerline, exterior noise levels have the potential to increase to from 65 dB to 68 CNEL (at 50 feet from the centerline). For any residential lot proposed by the Sycamore Estates PRD in Planning Areas 9, 7A, and 7 (west of the school/park site) that would be located closer than 80 feet from the Rancho Encantada Parkway centerline, potentially significant exterior and interior noise impacts would occur. As Rancho Encantada Parkway traverses the site to the east, the noise level would progressively decrease as the traffic levels decline. At buildout, Rancho Encantada Parkway noise levels along the majority of Sycamore Estates development would be 59-61 dB CNEL at 100 feet from the centerline. At 50 feet, the levels will be around 65 dB CNEL. Such levels would marginally meet City of San Diego exterior noise standards, but would require interior noise mitigation analysis to reduce interior noise levels to 45 dB.

□ OFF-SITE NOISE IMPACTS

As shown above in Table 4.7-2, implementation of the proposed Project at buildout would increase vehicular noise levels along Scripps Poway Parkway, Pomerado Road, and Spring Canyon Road by 0 - 2 dB at 100 feet from centerline. Along Scripps Poway Parkway vehicular noise would increase by 1 dB from Springbrook Drive to Pomerado Road, and along Spring Canyon Road, vehicular noise would increase from 1 - 2 dB between Pomerado Road and Spring Creek Road. Existing uses located along these roadway segments are sufficiently set back and buffered from the roadway such that an increase of 1 - 2 dB would not be significant. Along Pomerado Road, the noise level along several segments would increase by 1 dB, with maximum exterior noise levels reaching at 100 feet from the centerline increasing from 70 to 71 dB. An existing block wall is located along the west side of Pomerado Road, between the roadway edge and existing residential homes which likely adequately reduces vehicular noise impacts on existing residential homes to below a level of significance.

☐ SEWER PUMP STATION IMPACTS

A sewer lift station is proposed as a design option of the proposed Project and would be located in the northwestern portion of the Montecito sub-project site on one acre. The lift station would be enclosed for security, equipment protection, and odor control. The proposed lift station would consist of a masonry structure, approximately ten feet by twenty feet in size. Common use of masonry block for such enclosure reduces the audible noise levels by 40 - 50 dB. With electric-power pumps producing typical noise levels of 70 dB at 50 feet from the pump, the use of a masonry enclosure would reduce exterior noise to 20 - 30 dB. Such noise is undetectable under ambient conditions, and impacts would not be significant.

☐ AIRCRAFT NOISE IMPACTS

As noted above under "Existing Conditions," the project site located outside of the 60 dB CNEL contour for MCAS Miramar. Although average aircraft noise is well within acceptable levels, the normally quiet background levels within the project site may make single event noise clearly audible even if there is little impact to the weighted 24-hour average. Notification of new residents that the project area is outside the MCAS Miramar aircraft noise impact area, but still subject to occasional single-event impacts, would reduce the possible contention by future residents that they were unaware of being on the fringe of a noise impact zone. Because single event aircraft noise levels are generally not loud enough to measurably affect baseline conditions and because single events would not cause noise/land use compatibility standards to be exceeded, single event aircraft noise is not regarded as significant.

Significance of Impacts

Montecito Sub-Project

Significant interior noise impacts would potentially occur to residential homes proposed within 200 feet of the Pomerado Road centerline. Significant interior and exterior noise impacts would potentially occur to residential lots proposed within 80 feet of the Rancho Encantada Parkway centerline.

Sycamore Estates Sub-Project

Significant interior and exterior noise impacts would potentially occur to residential lots in Planning Areas 9, 7A, and 7 (west of the school/park site) proposed within 80 feet of the Rancho Encantada Parkway centerline.

Mitigation, Monitoring and Reporting Program

The measures listed below would reduce noise impacts to below a level of significance:

Montecito Sub-Project

- 4.7-1: Prior to the issuance of building permits for single-family residential units located within 200 feet of the Pomerado Road centerline or 80 feet of the Rancho Encantada centerline, a subsequent acoustical analysis shall be prepared by a qualified acoustician to ~~verify incorporation of~~ identify all necessary noise control requirements on building and site plans necessary to meet the City of San Diego interior standard of 45 dB CNEL and exterior standard of 65 CNEL. The consulting qualified acoustical analyst acoustician shall provide verification in writing that these requirements are met. Written verification shall be submitted to the Noise Abatement Officer of the City's Planning and Development Review Department City's Environmental Review Manager (ERM). Building permits for the first tier of homes adjacent to Pomerado Road or homes within 200 feet of the Pomerado Road centerline or within 80 feet of the Rancho Encantada Parkway centerline shall not be issued until the subsequent noise report acoustical analysis is approved by the City's Acoustical Plan Check Section ERM.

If architectural features are needed to achieve the interior noise standard, such features shall be noted on the building plans. The primary feature of an interior sound attenuation package is the use of dual-pane windows in the upstairs windows with a minimum sound transmission class of 26 to 28. Supplemental ventilation is required in these homes to allow for window closure. Air conditioning as a standard feature would meet the ventilation requirement. All noise level reduction architectural components shall be shown on the architectural building plans and shall be approved by the City's Planning and Development Review Department prior to the issuance of building permits.

- 4.7-2: A noise attenuation wall shall be constructed along Rancho Encantada Parkway in the locations shown on the Montecito Exhibit A VTM and PRD and specified in the acoustical analysis report.

Sycamore Estates Sub-Project

- 4.7-3: Prior to the issuance of building permits for single-family residential units in Planning Areas 9, 7A and 7 (west of the school/park site) and within 80 feet of the Rancho Encantada Parkway centerline, a subsequent acoustical analysis shall be prepared by a qualified acoustician to verify incorporation of identify all necessary noise control requirements on building and site plans necessary to meet the City of San Diego interior standard of 45 dB CNEL and exterior standard of 65 CNEL. The consulting qualified acoustical analyst acoustician shall provide verification in writing that these requirements are met. Written verification shall be submitted to the Noise Abatement Officer of the City's Planning and Development Review Department City's ERM. Building permits for the first tier of homes adjacent to Pomerado Road or within 80 feet of the Rancho Encantada Parkway in Planning Areas 9, 7A and 7 (west of the school/park site) shall not be issued until the subsequent noise report is approved by the City's Acoustical Plan Check Section ERM.

If architectural features are needed to achieve the interior noise standard, such features shall be noted on the building plans. The primary feature of an interior sound attenuation package is the use of dual-pane windows in the upstairs windows with a minimum sound transmission class of

26 to 28. Supplemental ventilation is required in these homes to allow for window closure. Air conditioning as a standard feature would meet the ventilation requirement. All noise level reduction architectural components shall be shown on the architectural building plans and shall be approved by the City's Planning and Development Review Department prior to the issuance of building permits.

- 4.7-4: A noise attenuation wall shall be constructed along Rancho Encantada Parkway in the locations shown on the Sycamore Estates Exhibit A VTM and PRD and as specified in the acoustical analysis report.

4.8 AIR QUALITY

An air quality analysis has been conducted for the *Rancho Encantada* project by Giroux & Associates. The report entitled "*Air Quality Impact Analysis—Rancho Encantada, City of San Diego, California*" (May 26, 2000) is included in Appendix G to this EIR. The analysis assesses existing air quality baseline conditions in the project vicinity and identifies projected future conditions with implementation of the proposed project.

4.8.1 EXISTING CONDITIONS

□ CLIMATIC CONDITIONS

The climate of the *Rancho Encantada* area is characterized by a repetitive pattern of frequent early morning cloudiness, hazy afternoon sunshine, clean daytime onshore breezes and little temperature change throughout the year. Limited rainfall occurs in winter while summers are often completely dry. An average of 10 inches of rain falls each year from November to early April.

The atmospheric conditions limit the ability of the atmosphere to disperse the air pollution generated by the large population. The onshore winds diminish quickly when they reach the foothill communities east of San Diego, and the sinking air within the offshore high pressure system forms a massive temperature inversion that traps all air pollutants near the ground. The resulting horizontal and vertical stagnation, in conjunction with ample sunshine, cause a number of reactive pollutants to undergo photochemical reactions and form smog that degrades visibility and irritates tear ducts and nasal membranes.

High smog levels in coastal communities occasionally occur when polluted air from the South Coast (Los Angeles) Air Basin drifts seaward and southward at night and then blows onshore the next day. Such interbasin transport would cause occasionally unhealthy air over much of San Diego County despite the best air pollution control efforts.

□ METEOROLOGICAL SETTING

Local meteorological conditions in the *Rancho Encantada* project area conform well to the regional pattern of strong onshore winds by day, especially in summer, and weak offshore winds at night, especially in winter. These local wind patterns are driven by the temperature difference between the normally cool ocean and the warm interior. In summer, moderate breezes of 8 to 12 mph blow onshore by day and may continue all night as a light onshore breeze, because the land remains warmer than the ocean. In winter, the onshore flow is weaker, and reverses in the evening as the land becomes cooler than the ocean.

While winds affect the horizontal extent of pollution dispersion, the onshore flow by day and the nocturnal land breeze are both accompanied by characteristic temperature inversions that control the vertical depth through which pollutants can be mixed. The strong onshore flow undercuts a deep layer

of warm sinking air within the Pacific high pressure cell. The interface between the cool layer near the ground and the warm layer aloft is a boundary where the normal decrease of temperature height is reversed (an inversion) and functions as a giant lid over the coastal airshed where pollutants are continually added from below, but without any vertical dilution because of the impermeability of the inversion boundary. As the polluted layer moves inland where the surface topography rises, the inversion remains at about the same height. The same amount of pollution can be thought of as being squeezed into a progressively shallow layer with correspondingly higher and higher concentrations. This vertical stagnation, combined with the fact that it takes several hours of transport time to convert reactive pollutants into ozone, creates high photochemical smog levels in foothill communities east of the San Diego urban complex.

In winter at night, the air near the ground cools by contact with the radiating ground surface while the air aloft remains warm. The radiation inversions thus formed are very shallow and occur in conjunction with nearly calm winds. The shallow vertical barrier and light horizontal transport lead to a marked stagnation of emissions from localized sources such as freeways, large parking lots, and major intersections. Such microscale "hot spots" associated with these cool-season radiation inversions are, however, less pervasive, less severe, and more amenable to mitigation than the regional photochemical air pollution that occurs in conjunction with the regional, warm-season marine/subsidence inversions. As automobiles have become progressively cleaner within the last two decades, any localized violations of clean air standards associated with adjacent traffic sources have correspondingly decreased.

□ AMBIENT AIR QUALITY STANDARDS

National Ambient Air Quality Standards (AAQS) were established in 1971 for six pollution species. States have the option to add other pollutants, require more stringent compliance, or to include different exposure periods. Because California had established more stringent State AAQS before the federal action and because of unique air quality problems introduced by the restrictive dispersion meteorology, there is a difference between state and national clean air standards. Those standards currently in effect in California are shown in Table 4.8-1, *State of California Air Resources Board, Ambient Air Quality Standards*.

In order to gauge the significance of potential air quality impacts of the proposed *Rancho Encantada* project, existing background air quality levels must be compared with the applicable ambient air quality standards. These standards are the levels of air quality considered safe, with an adequate margin of safety, to protect those people most susceptible to further respiratory distress such as asthmatics, the elderly, very young children, people already weakened by other disease or illness, and persons engaged in strenuous work or exercise, called "sensitive receptors." Recent research suggests, however, that long-term exposure to levels of air pollution at or above standards may cause chronic adverse health effects. Just meeting standards may not provide a sufficient health protection cushion for sensitive receptor populations.

Planning and enforcement of the new federal standards for PM-2.5 and for ozone (8-hour) was put on hold through a decision by the U.S. Court of Appeals. Data collection for these standards is on-going, but no additional attainment action can be taken until legal issues are resolved.

Table 4.8-1
STATE OF CALIFORNIA
AIR RESOURCES BOARD AMBIENT AIR QUALITY STANDARDS

POLLUTANT	AVERAGING TIME	CALIFORNIA STANDARDS	FEDERAL PRIMARY STANDARDS
		CONCENTRATION	CONCENTRATION
Ozone	1 Hour	0.09 ppm	0.12 ppm
Carbon Monoxide	8 Hours	9 ppm	9 ppm
	1 Hour	20 ppm	35 ppm
Nitrogen Dioxide	Annual Average		0.053 ppm
	1 Hour	0.25 ppm	
Sulfur Dioxide	Annual Average		0.03 ppm
	24 Hours	0.04 ppm	0.14 ppm
	1 Hour	0.25 ppm	
Suspended Particulate Matter (PM ₁₀)	Annual Geometric Mean	30 µg/m ³	
	24 Hours	50 µg/m ³	150 µg/m ³
	Annual Arithmetic Mean		50 µg/m ³
Sulfates	24 Hours	25 µg/m ³	
Lead	30 day Average	1.5 µg/m ³	
	Calendar Quarter		1.5 µg/m ³
Visibility Reducing Particles	8 Hours (10 a.m. to 6 p.m., PST)	In sufficient amount to reduce the visual range to less than 10 miles at relative humidity less than 70 percent.	

□ BASELINE AIR QUALITY

Project area air quality can be best characterized from ambient measurements made by the San Diego County Air Pollution Control District (APCD), the agency responsible for air quality planning, monitoring and enforcement in the San Diego Air Basin (SDAB). The pollution monitoring station

located at the County Operations Center on Overland Avenue in Kearny Mesa is the closest station to the project area that monitors the full spectrum of air quality. While there is likely some air quality difference between the project area and Kearny Mesa, the differences are not expected to be substantial. Table 4.8-2, *Rancho Encantada Air Quality Monitoring Summary*, summarizes the last seven years of the most recent available monitoring data from the Kearny Mesa station. At these locations, healthful air quality is seen in almost every pollution category. The only national standard that was exceeded within the seven-year monitoring period (one violation per year is allowed under federal guidelines) was an occasional violation of the national ozone standard. The more stringent State standard for ozone and the State Standard for responsible particulates (PM-10) were also exceeded.

Continued encouraging progress is seen in peak ozone and particulate levels. The federal ozone standard has been met on Kearny Mesa from 1994-1998, and the State PM-10 standard was met in 1996-98. The more stringent one-hour State PM-10 standard was the only pollutant that violated clean air standards in the last five years of published data. The federal ozone standard was exceeded once in 1998, but federal standards allow for one violation per year averaged over three years and still be considered to be in "attainment." Although violations of clean air standards are relatively infrequent in the project vicinity, there is no sign that complete attainment will occur in the near future.

□ SOURCES OF POLLUTION

Nitrogen oxides (NO_x) and reactive organic gases (ROG) are the two precursors to photochemical smog formation. In San Diego County, 68 percent of the 310 tons per day of ROG emitted come from mobile (cars, ships, planes, heavy equipment, etc.) sources. For NO_x, 88 percent of the 240 tons emitted daily are from mobile sources. Computer modeling of smog formation has shown that a reduction of around 25 percent each of NO_x and ROG would allow the SDAB to meet the federal ozone standard on days when there is no substantial transport of pollution from the South Coast Air Basin (SCAB) or other airshed.

□ AIR QUALITY MANAGEMENT PLANNING

The continued violations of national AAQS in the SDAB, particularly those for ozone in inland foothill areas, requires that a plan be developed outlining the pollution controls that will be undertaken to improve air quality. In San Diego County, this attainment planning process is embodied in the Regional Air Quality Strategies (RAQS) developed jointly by the Air Pollution Control District (APCD) and the San Diego Association of Governments (SANDAG).

A plan to meet the federal standard for ozone was developed in 1994 during the process of updating the 1991 state-mandated plan. This local plan was combined with those from all other California non-attainment areas with serious ozone problems to create the California State Implementation Plan (SIP). The SIP was adopted by the Air Resources Board (ARB) after public hearings on November 9-10, 1994, and forwarded to the U.S. Environmental Protection Agency (EPA) for their approval. After considerable analysis and debate, particularly regarding airsheds with the worst smog problems, EPA approved the SIP in mid-1996.

Table 4.8-2
RANCHO ENCANTADA AIR QUALITY MONITORING SUMMARY
 (Number of Days Standards Were Exceeded and Maxima for Period Indicated)

POLLUTANT/STANDARD	1992	1993	1994	1995	1996	1997	1998
Ozone (Del Mar):							
1-Hour > 0.09 ppm (a)	15	15	2	8	7	7	4
1-Hour > 0.12 ppm (b)	6	3	0	0	0	0	1
1-Hour > 0.20 ppm (c)	0	0	0	0	0	0	0
Maximum 1-Hour Conc. (ppm)	0.13	0.16	0.15	0.10	0.12	0.12	0.12
Carbon Monoxide:							
1-Hour > 20. ppm (a)	0	0	0	0	0	0	0
8-Hour > 9. ppm (a, b)	0	0	0	0	0	0	0
Maximum 1-Hour Conc. (ppm)	6.	6.	5.	5.	5.	5.	6.
Maximum 8-Hour Conc. (ppm)	2.8	3.1	3.1	3.8	3.5	3.4	3.4
Nitrogen Dioxide:							
1-Hour > 0.25 ppm (a)	0	0	0	0	0	0	0
Maximum 1-Hour Conc. (ppm)	0.08	0.14	0.12	0.13	0.12	0.12	0.11
Respirable Particulates (PM-10):¹							
24-Hour > 50 $\mu\text{g}/\text{m}^3$ (a)	0/56	--	3/16	1/57	6/55	0/55	0/59
24-Hour > 150 $\mu\text{g}/\text{m}^3$ (b)	0/56	--	0/16	0/57	0/55	0/55	0/59
Maximum 24-Hour Conc. ($\mu\text{g}/\text{m}^3$)	36.	--	79.	60.	82.	50.	47.
¹ 1) The ambient air quality standard is for the 10-micron diameter or less fraction of total suspended particulates (TSP) called PM-10. PM-10 data acquisition was begun in 1993. (a) = State AAQS (b) = National AAQS (c) = State first-stage smog alert level -- = No data available 1999 Ozone Data - 3 violations State Standard, 0 violations State standard Maximum 1 hour = 0.10 ppm							

Source: San Diego Air Pollution Control District, and San Diego-Overland Monitoring Stations.

During the planning process and smog formation modeling, it was discovered that the SDAB can meet the federal ozone standard by the year 1999 without the creation of any new control programs not already in progress. Airsheds demonstrating an ability to meet standards by 1999 (in the absence of transport from one basin to another) are classified as having a "serious" ozone problem instead of being classified as "severe." The SDAPCD requested that EPA reclassify the air basin from severe to serious. This request was subsequently approved.

The proposed *Rancho Encantada* development project relates to the SIP and/or RAQS through the land use and growth assumptions that are incorporated into the air quality planning document. If a proposed project is consistent with the City of San Diego General Plan or is a part of an adopted community or

subarea plan that was included in the transportation and associated air pollution emissions forecasts, then the project presumably has been anticipated within the regional air quality planning process. Such consistency, in conjunction with inclusion of all possible trip reduction measures as required by the City of San Diego Transportation Demand Management Program, insures that the project would not have an adverse regional air quality impact. If the relocation or change in vehicular emissions patterns from the proposed project further does not create any unacceptable microscale impacts immediately adjacent to the proposed project site, then the project would have a less than significant individual air quality impact.

4.8.2 IMPACT ANALYSIS

Issue 1: *Would the proposed project deteriorate air quality by created dust or motorized air emissions?*

Significance Criteria

A potentially significant air quality impact is defined as one that either: a) creates violations of clean air standards; b) contributes measurably to an existing violation; or c) exposes people to contaminants for which there are no presumed safe exposures.

For projects such as *Rancho Encantada* that create mainly automobile traffic whose emissions require complex photochemical reactions to reach their most harmful state, there is no way to measure the impact to establish a "measurable contribution." Various air pollution control/ management agencies have developed guidelines using total project emissions as a surrogate for determining regional impact potential. Thus, the following air pollution emissions criteria are used in this EIR to differentiate between microscale and/or regional significance, as follows:

Carbon Monoxide (CO):	550 lb/day
Reactive Organic Gases (ROG):	100 lb/day
Nitrogen Oxides (NO _x):	250 lb/day
Sulfur Dioxide (SO _x):	250 lb/day
Suspended Particulate Matter (PM-10):	100 lb/day

Impact Analysis

CONSTRUCTION-RELATED IMPACTS

Buildout of the *Rancho Encantada* Precise Plan, including the Montecito and Sycamore Estates sub-projects would entail construction activity in clearing and grading the site and building new structures and facilities. Construction activity also would occur off-site along a proposed sewer line alignment, if the gravity sewer design option is implemented. Construction activities create a temporary addition of pollutants to the local airshed. These emissions are quite variable in time and space and differ considerably among various construction projects. Such emission levels can, therefore, only be

approximately estimated with a corresponding uncertainty in precise ambient air quality impacts. Because of their temporary nature, construction activity impacts have often been considered as having a less than significant air quality impact. However, the cumulative impact from all simultaneous construction in the San Diego Air Basin is a major contributor to the overall pollution burden – especially for particulate matter (PM-10). A number of current APCD strategies thus focus on dust control and on using cleaner off-road equipment to reduce the role of construction in the degradation of air quality of the region.

Three types of dust emissions are typically associated with construction. Large particulates are generated that settle out again rapidly in close proximity to the source. A fraction of the material is small enough to remain suspended in the air semi-indefinitely. The size cut-off for these total suspended particulates (TSP) is around 30 microns in diameter. The size cut-off for particulate matter that is deeply respirable is 10 microns or less and is called PM-10. The PM-10 fraction of TSP is assumed to be around 50 percent and the PM-10 emission factor for project-related soil disturbance is around 55 pounds per day per acre disturbed in the absence of any dust control.

The *Rancho Encantada* project site is ~~2,568~~ 2,658 acres, approximately 743 acres of which would be disturbed by grading and improvements. Approximately 153 acres of the Montecito sub-project site is proposed to be graded and approximately 590 acres of the Sycamore Estates sub-project site is proposed to be graded. For purposes of a worst-case analysis, five percent of the entire ~~2,6578~~ acre Precise Plan area, or 133 acres, was assumed to be disturbed on a maximum grading activity day.

In the absence of any dust control, simultaneous disturbance of the 133 acres would generate daily total PM-10 emissions of approximately 7,300 pounds if no mitigation measures are implemented. Implementation of vigorous dust control measures would reduce PM-10 associated with grading by 50-75 percent or in the range of 1,800-3,600 pounds per day. There are no standards of significance for daily construction activity dust emissions. However, the non-attainment status of the air basin for PM-10 requires that all reasonably feasible dust control measures be utilized. However, even if an aggressive dust control program is implemented during construction, the substantial daily PM-10 emissions may potentially create violations of PM-10 standards both near the project site, as well as on a regional scale which is regarded as a potentially significant short-term cumulative impact.

Relative to any assessment of fugitive dust impact significance, recent research has demonstrated that PM-10 is not a good indicator of human health effects from particulate inhalation. It has been clearly demonstrated that the health risk lies in much smaller particulate matter with diameters of 2.5 microns or less, called “PM-2.5.” New federal standards for PM-2.5 were promulgated in 1997. Research has shown that mechanical abrasion processes such as clearing or grading of soil contribute little to the area PM-2.5 burden. Since grading is not a major PM-2.5 contributor, and since inert silicates comprising soil dust are further not particularly unhealthful, impacts relative to the new PM-2.5 standards are less than significant.

Potential air quality impacts are therefore dominated by heavier particles that settle out on parked cars, outdoor furniture, landscaping, etc. Large particle emissions thus comprises more of a soiling nuisance rather than any potentially unhealthful air quality impact. With prevailing daytime west to east winds,

dust soiling potential is likely greatest directly east of the project site. There are no dust-sensitive receptors east of the project site in sufficiently close proximity as to create observable dust deposition. Good control of fine particulates also results in substantial reduction in nuisance potential from larger particulate matter. While dust deposition can be minimized, it often cannot be completely eliminated. While temporary soiling nuisance is considered adverse, it does not constitute a significant air quality impact.

□ CONSTRUCTION EQUIPMENT EMISSIONS

Construction equipment entails the use of internal diesel-powered combustion engines which are not regulated in terms of allowable emission levels. Equipment exhaust as well will be released during project construction activities from mobile sources during site preparation. On-site, diesel-powered construction equipment will create gaseous and particulate tailpipe emissions that are not regulated by smog control rules such as for on-road sources. Recent new rules for off-road equipment have been adopted, but they apply to future new equipment purchases and not to the historical off-road equipment fleet likely to be used during site grading. Typical site grading activity for the Precise Plan area was assumed to entail twenty (20) scrapers operating at an average power load of 60 percent of full throttle, assisted by four dozers and four graders operating at a 40 percent power level each. Daily equipment exhaust emissions are shown in Table 4.8-3, *Typical Daily Mass Grading Equipment Exhaust Emissions*. None of the emissions from on-site equipment operations exceed the daily emissions activity significance threshold.

Because daily NO_x emissions could approach 400 pounds per day, and because NO_x is a component of photochemical smog formation, a potentially significant short-term air quality impact would occur, and all reasonably available NO_x reduction measures should be implemented. Mitigation would consist of periodic low-NO_x tune-ups for such equipment to maintain NO_x emissions at feasibly minimum levels. Although the daily NO_x emissions are substantial, the mobile nature of the construction equipment will prevent any localized violation of the NO_x standard. Emissions will also be spread out over a wide area and over an extended buildout schedule. There may be localized instances when the characteristic diesel exhaust odor might be noticeable from passing trucks or nearby heavy equipment, but such transitory exposure is a brief nuisance and will not threaten air quality standards.

Construction activities are most noticeable in the immediate vicinity of the construction site. There is, however, some potential for "spill-over" into the surrounding community. Spillage may be physical such as dirt tracked onto public streets or dropped from trucks. Spill-over may also be through congestion effects where detours, lane closures, or construction vehicle competition with non-project peak hour traffic slows traffic beyond the immediate construction site to less pollution-efficient travel speeds. Such off-site effects are controllable through good housekeeping and proper construction management/scheduling. Management techniques are suggested in the mitigation discussion to reduce potential spill-over impacts.

All emissions increases would be below the identified regional significance threshold, with the exception of NO_x. As stated above, mitigation measures will be implemented to reduce daily NO_x emissions. Any impact significance, as with fugitive dust, would occur in very close proximity to the

project site itself. The exposure of any individual person to mobile construction equipment emissions would be transitory and not at levels considered unhealthy.

Table 4.8-3
TYPICAL DAILY MASS GRADING EQUIPMENT EXHAUST EMISSIONS
(lb/day)

Emissions Factors (pounds/hour @ 100% load)					
Equipment	CO	ROG	NO _x	SO ₂	PM-10
Tracked Dozer	0.20	0.12	1.26	0.14	0.11
Motor Grader	0.15	0.04	0.71	0.09	0.06
Scraper	1.25	0.27	3.84	0.46	0.41
Daily Emissions (pounds/day)					
Tracked Dozer	2.6	1.5	16.1	1.8	1.4
Motor Grader	1.9	0.5	9.1	1.2	0.8
Scraper	120.0	25.9	368.6	44.2	39.4
Total	124.5	27.9	393.8	47.2	41.6
Significance Criteria	550.	100.	---	---	---
Significant?	No	No	No	No	No

Source: USEPA Compilation of Air Pollutant Emission Factors, AP-42 (1995 rev.)

☐ MOBILE SOURCE EMISSIONS IMPACTS

The primary Project-related air quality concern stems from the generation of vehicle trips. As discussed in Section 4.6, TRANSPORTATION, development of the proposed Project would generate 10,548 ADT, with 2,760 ADT attributable to the Montecito sub-project and 7,788 ADT attributable to the Sycamore Estates sub-project.

The California ARB URB7G computer model was run to calculate the regional exhaust pollution burden associated with project implementation. The URB7G model was run for a Year 2020 buildout. The results are summarized in Table 4.8-4, *Project-Related Mobile Source Emissions*. Table 4.8-4 shows identified significance thresholds will not be exceeded for either ROG or CO for both vehicle mix assumptions. The project magnitude is sufficiently limited in scope for project-related mobile source emissions to not exceed regional significance thresholds for a 2020 analysis year.

While the increase in the proposed project's regional mobile source emissions would not have a significant impact on local San Diego air quality, the addition of project-related traffic in the area may

change microscale air quality distributions. A microscale impact analysis is required by the City of San Diego CEQA Guidelines if project-related CO emissions exceed 550 pounds per day of CO, and if any intersections are forecast to operate at an LOS D or worse during the morning rush hour when dispersion is poorest. The project's increase in CO emissions would total 949.8 pounds per day.

Actual project buildout may occur well before 2020. The margin of safety between the ROG significance threshold and the project related emissions is sufficient to preclude any significant impacts even if buildout occurs well before 2020. The CO threshold may be exceeded for an earlier buildout than 2020. However, the project microscale air quality analysis demonstrates a similarly large margin of safety between localized CO levels and the applicable standard. An earlier buildout than 2020 would thus not adversely affect regional (ROG threshold not exceeded) or local (CO threshold exceeded, but no "hot spots") air quality. Operational activity would have a less than significant air quality impact relative to adopted emissions-based significance thresholds except for intersections that experience a level of service E or F.

Table 4.8-4
PROJECT-RELATED MOBILE SOURCE EMISSIONS (2020)
(lb/day)

Land Use	ROG	NOx	CO	PM-10
"Default" Truck Mix	54.6	165.3	542.4	89.6
Typical Residential Mix	35.1	65.0	406.4	86.0
<i>Total</i>	<i>89.7</i>	<i>230.3</i>	<i>949.8</i>	<i>176.6</i>
Signif. Threshold	100.*	—	550.**	—
Significant?	No	--	Yes	--

* = in free-flow traffic; ** = if LOS E or F near project site

Source: Giroux & Associates, 2000 based on URB7G Air Quality Model; output in appendix

□ SEWER LIFT STATION IMPACTS

A sewer lift station is proposed as a design option of the proposed Project and would be located in the northwestern portion of the Montecito sub-project site on one acre. The lift station would be enclosed for security, equipment protection, and odor control. Potential odors from the lift station could be caused by inorganic or organic molecules. The two most common inorganic molecules are hydrogen sulfide (H₂S) and ammonia (NH₃). While these chemicals are present in relatively low concentration, they have a very low concentration detection threshold. Some of these materials are detectable in only parts per billion of odorant in an air sample. Their evolution from wastewater depends upon the age of the sewage, the temperature of the wastewater, and the ratio of readily decayable organic solids to total material. Any odor potential from the proposed lift station would thus depend upon sewage "freshness" and odorant emission rate. Control of such odor would depend upon keeping the sewage moving and capturing any gaseous emissions associated with the system as effectively as possible.

Independent of wind direction and turbulence, the amount of natural turbulent dilution, even under worst-case conditions, would reduce odor strengths to undetectable levels at the nearest existing homes. The odor strength is generally expressed in a factor called the "Dilution to Threshold," or D/T. When odors require five dilutions (5 D/T) with clean air to become undetectable, people become clearly aware of the odor. At 10 D/T, people begin to complain if the odor is unpleasant. Maintaining odor levels at less than 5 D/T is the goal of any odor control program. A 10 D/T level would be considered a significant air quality impact.

A dispersion model was used to estimate the odor level (in units of D/T) for a vent release of fresh versus stale sewage gas. An odor concentration of 30 D/T was assumed for fresh sewage, and 2000 D/T for stagnant material. The downwind concentration is shown in Table 4.8-5, *Odor Concentration*.

**Table 4.8-5
ODOR CONCENTRATION (D/T)**

DISTANCE	FRESH SEWAGE	STALE SEWAGE
3'	30	2000
6'	10	700
13'	3	200
26'	1	70
52'	0.3	20
105'	0.1	7
210'	0.03	2

Source: Turner, D.B. Workbook of Atmospheric Dispersion, 1994.

As stated in Table 4.8-5, a potentially significant 10 D/T level extends to 6 feet from the lift station for fresh material in the system, and to around 100 feet for sewer gas from an anaerobic system. Neither case would affect any existing homes. Any existing or future homes are located at least 100 feet away from the lift station. Even if the contents of the wet well in the pump station were to inadvertently become anaerobic, odor would still not be detectable at any existing or possible future residential uses. Odor detectability would thus be confined to the immediate vicinity of the lift station. Any potentially adverse impacts would be confined only to workers servicing the lift station; thus, direct impacts would not be considered significant.

□ SECONDARY PROJECT IMPACTS

Rancho Encantada would contribute a variety of additional pollution sources that are small on a total Project basis, but which may become significant when considered cumulatively. These may include one or more of the following that would be considered a non-negligible portion of the total basin air pollution burden.

- Surface coatings (paints, thinners, solvents, cleaning compounds) used in construction and maintenance
- Project-related energy consumption (electricity and gas)
- Building material preparation (sand, gravel, concrete, stucco)
- Pesticide and herbicides for landscape maintenance and weed control
- Landscape utility equipment operation (mowers, edgers, blowers)

Even when considered over the entire Project area, the total emission levels from these secondary sources are small and would not be considered significant.

Significance of Impacts

Short-term fugitive dust (PM-10) impacts generated during construction and NO_x emissions generated from diesel powered construction equipment would be regarded as significant. The project's contribution to the San Diego region's current inability to meet air quality standards would be considered a direct and cumulatively significant impact. The proposed Project would not result in significant direct impacts to air quality associated with vehicular trips or stationary sources, including the proposed sewer lift station.

Mitigation, Monitoring and Reporting Program

The following mitigation measures are required for both the Montecito and Sycamore Estates sub-projects. Direct impacts would be mitigated to below a level of significance. Cumulative impacts would remain significant and unmitigated.

- 4.8-1: Prior to approval of grading permits, the owner/permittee shall submit an accelerated construction dust abatement management program to the City of San Diego Planning and Development Review Department, Environmental Review Manager (ERM) for approval. Dust abatement shall consist of, but not be limited to, soil stabilizers, truck wash stations, use of tarpaulins or covers on haul trucks, and site watering to the satisfaction of the Planning and Development Review Department. Site watering shall increase if wind speeds exceed 15 mph. Uncovered soils being stockpiled shall be bound or covered when deposits are not being made.

The dust abatement program shall achieve a minimum of 60 percent dust abatement. The dust abatement program shall be made a condition of the grading permit and shall be monitored by the City of San Diego through periodic inspection during grading. If the City of San Diego's Inspection Services field inspector finds that the accelerated construction dust abatement program is not being complied with, a "stop work" order shall be issued until compliance is obtained.

- 4.8-2: Prior to the commencement of construction, Low NOx tune-ups shall be required of all diesel powered construction equipment. Documentation of the tune-up shall be provided to the City of San Diego's Environmental Review Manager prior to the commencement of construction. Additional Low NOx tune-ups may be required periodically over the course of Project construction, as required by the City of San Diego's Environmental Review Manager.
- 4.8-3: Prior to approval of a construction permit for the off-site gravity sewer line in the City of Poway, the permittee shall submit a dust abatement management program to the City of Poway for approval. The dust abatement program shall be made a condition of the construction permit and shall be monitored by the City of Poway through periodic inspection during grading. If the City of Poway's field inspector finds that the dust abatement program is not being complied with, a "stop work" order shall be issued until compliance is obtained.

Issue 2: *Would the proposed project expose sensitive receptors to substantial pollutant concentrations?*

Significance Criteria

Local microscale impacts would be regarded as significant if CO emissions were generated and there were any congested (LOS=E or F) intersections in the project vicinity. A significant impact also would occur if the project would contribute to exceeding the one-hour California CO standard of 20 ppm.

Impact Analysis

While regional mobile source emissions associated with the proposed Project would not have a significant long-term impact on local San Diego air quality, the addition of Project related traffic in the area may change microscale air quality distributions. To determine whether future traffic changes would create an adverse air quality impact, a microscale air quality analysis was performed for the traffic analysis grid near the project site. A California Department of Transportation (CalTrans) screening procedure based on the California line source roadway dispersion model CALINE4 was run for existing and future traffic scenarios to evaluate any changes due to the Project.

CO emission levels have been calculated as a part of the project-specific air quality study to be below the 550 pounds per day threshold for a year 2020 buildout condition. However, a somewhat earlier buildout with a less "clean" vehicle fleet could cause the 550 pound threshold to be exceeded. Because

this would be regarded as a potentially significant impact, additional analysis was conducted as part of the study. There are several intersections that do now, or will in the future, operate at worse than an LOS = D. The model procedure that was followed for the additional analysis combined the results of the Project's traffic analysis (see Appendix G of this EIR) with minimum dispersion conditions in order to generate a worst case impact assessment. Hourly CO concentrations in ppm were calculated based on a.m. peak hour traffic and minimum meteorological dispersion conditions. The a.m. hour was used because air temperatures are colder, winds are lighter, and nocturnal inversions have normally not yet burned off early in the morning in winter.

Project-related microscale impacts at the intersections analyzed are shown in Table 4.8-6, *Microscale Impact Analysis*. The maximum reported one-hour background CO level at the SDAPCD Kearny Mesa station from 1996-98 was 6 ppm. If the worst-case background level were to coincide with the maximum local microscale exposure, it would require a 14 ppm local contribution to exceed the one-hour California CO standard of 20 ppm.

Table 4.8-6
MICROSCALE IMPACT ANALYSIS
(Hourly CO Concentrations in ppm above non-local
Background at 25 feet from the Roadway)

INTERSECTION	EXISTING	OPENING DAY (NO PROJECT)	OPENING DAY (MONTECITO ONLY)	OPENING DAY (PROJECT BUILDOUT)	BUILDOUT 2020 (NO PROJECT)	BUILDOUT (WITH PROJECT) ¹
Poway Rd/ Community Rd	---	---	---	---	---	2.0
Stowe Dr/ Community Rd	---	---	---	---	1.6	1.6
Scripps Pwy Pkwy/ Community Rd	---	---	---	---	3.7	4.2
Scripps Pwy Pkwy/ Spring Cyn Rd	---	---	---	---	2.4	2.4
Scripps Pwy Pkwy/ Springbrook Dr	---	---	---	---	---	---
Scripps Pwy Pomerado Rd	---	---	---	---	3.4	4.7
Scripps Pwy Pkwy/Kirkham Way	---	---	---	---	3.4	3.6
Pomerado Rd/Willow Crk	6.7	6.3	6.5	7.0	2.5	2.9
Pomerado Rd/Scripps Ranch Blvd	6.8	5.5	5.8	6.4	2.2	2.5
Pomerado Rd/Chabad Ct	---	---	---	---	---	1.9
Pomerado Rd/Avenida Magnifica	---	---	---	---	1.1	---
Scripps Ranch Blvd/Mira Mesa Blvd	---	9.2	9.3	9.5	3.8	3.9

INTERSECTION	EXISTING	OPENING DAY (NO PROJECT)	OPENING DAY (MONTECITO ONLY)	OPENING DAY (PROJECT BUILDOUT)	BUILDOUT 2020 (NO PROJECT)	BUILDOUT (WITH PROJECT)
Scripps Ranch Blvd/ Scripps Lake Dr	---	---	---	---	1.9	1.9
Mira Mesa Blvd/ I-15 NB Ramps	---	---	---	---	3.1	3.1
Mira Mesa Blvd/ I-15 SB Ramps	---	7.1	8.6	11.0	5.3	5.3
Carroll Cyn Rd/ I-15 NB Ramps	4.7	5.7	5.8	5.8	3.4	3.4
Carroll Cyn Rd/ I-15 SB Ramps	7.6	9.5	9.5	9.6	3.9	4.0
Pomerado Rd/ I-15 NB Ramps	---	---	---	---	2.4	2.5
Pomerado Rd/ I-15 SB Ramps	7.7	7.1	7.2	7.5	5.7	5.9
Scripps Poway Rd/I-15 NB Ramps	6.4	5.9	5.9	6.0	3.1	3.1
Sabre Springs/ Poway Rd	---	---	---	---	2.1	2.1
Pomerado Rd/9th Street	---	---	---	---	1.1	1.2
Pomerado Rd/ Meadowbrook	---	---	---	---	2.7	2.7
Pomerado Rd/Ted Williams Pkwy	---	---	---	---	1.9	2.0
Scripps Cyn Rd/ Scripps Ranch Blvd	---	---	---	---	---	1.2
--- = LOS C or better						

Source: Giroux & Associates, September 26, 2000, using Caltrans Screening Procedure (AQTAN, 1988)

1. If proposed Street "B" was available for emergency-only traffic, an additional three percent of Project traffic would be directed to Rancho Encantada Parkway. Microscale impacts would not differ from that shown by this table. The affected peak hour volumes would be very small, increased delays would not change any levels of service, and the average delay increase would be less than one second per vehicle.

Because localized CO levels in Table 4.8-6 do not exceed 14 ppm at any of the studied intersections. As shown, maximum potential CO increases associated with project implementation and cumulative growth are 3.9 ppm, or less than 20 percent of the most stringent one-hour standard of 20 ppm. Microscale air quality impacts ("hot spots") are therefore considered less than significant.

Significance of Impacts

Localized CO levels would not exceed 14 ppm at any of the studied intersections; thus, impacts are regarded as not significant.

Mitigation, Monitoring and Reporting Program

Impacts are less than significant; therefore, no mitigation is required.

4.9 CULTURAL RESOURCES

Four cultural resources surveys have been conducted within the *Rancho Encantada* Precise Plan area. A cultural resources survey for approximately 237 acres of the 278-acre of the Montecito sub-project site was conducted by BRIAN F. SMITH AND ASSOCIATES (BFSA) in January and August 1999, and the resulting report, dated September 7, 1999, is included as Appendix H1 to this EIR. The initial reconnaissance was conducted by BFSA archeologists on January 27 & 28, 1999, which was followed by an enhanced survey completed on August 23 through 26, 1999. An addendum to BFSA's report was conducted for the additional 41 acres of the sub-project site by KYLE CONSULTING in January 2000. This addendum report is included as Appendix H2 to this EIR. A cultural resources survey for the Sycamore Estates sub-project site and the 248-acre City of San Diego parcel was conducted by KYLE CONSULTING from May 3 through 21, 1999, and is included as Appendix H3 to this EIR. Significance testing of identified sites on the Sycamore Estates sub-project site was conducted by KYLE CONSULTING, in May and June 2000, with the results documented in a report dated September 2000, and included as Appendix H5 to this EIR. A letter report, also prepared by KYLE and contained as Appendix H4, documents the results of a cultural resources survey along an off-site gravity sewer alignment proposed as a design option in the City of Poway. The information contained in these four reports form the information base for analysis in this section.

4.9.1 EXISTING CONDITIONS

The following is a general summary of the cultural resources background applying to the proposed project site and the cultural resources found within the Precise Plan area as a result of site-specific cultural resource surveys and record searches. The record searches from the Museum of Man and the South Coastal Information Center at San Diego State University were used to identify any previously recorded resources within the proposed Precise Plan area. This summary is followed by a specific discussion of the cultural resources on the three individual properties that comprise the *Rancho Encantada* Precise Plan.

For purposes of this EIR, and as specified by Section 15064.5 (a) of the 1999 CEQA Guidelines, the criteria for a "historical resource" is defined as:

(1) A resource listed in, or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources (Pub. Res. Code SS5024.1, Title 14 CCR, Section 4850 et seq.).

(2) A resource included in a local register of historical resources, as defined in section 5020.1(k) of the Public Resources Code or identified as significant in an historical resource survey meeting the requirements section 5024.1(g) of the Public Resources Code, shall be presumed to be historically or culturally significant. Public agencies must treat any such resource as significant unless the preponderance of evidence demonstrates that it is not historically or culturally significant.

(3) Any object, building, structure, site, area, place, record, or manuscript which a lead agency determines to be historically significant or significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California may be considered to be an historical resource, provided the lead agency's determination is supported by substantial evidence in light of the whole record. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the criteria for listing on the California Register of Historical Resources (Pub. Res. Code SS5024.1, Title 14 CCR, Section 4852) including the following:

(A) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;

(B) Is associated with the lives of persons important in our past;

(C) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or

(D) Has yielded, or may be likely to yield, information important in prehistory or history.

(4) The fact that a resource is not listed in, or determined to be eligible for listing in the California Register of Historical Resources, not included in a local register of historical resources (pursuant to section 5020.1(k) of the Public Resources Code), or identified in an historical resources survey (meeting the criteria in section 5024.1(g) of the Public Resources Code) does not preclude a lead agency from determining that the resource may be an historical resource as defined in Public Resources Code sections 5020.1(j) or 5024.1.

REGIONAL HISTORY

Based on archaeological record searches conducted for the Precise Plan area and recent studies completed for a non-related project in the City of Poway, the Beeler Creek area and the adjacent Poway Valley appears to have been densely populated in prehistoric times. Excavations completed for SDI-4608 at the east end of Beeler Canyon as part of the Scripps Poway Parkway Mitigation program revealed a long period of occupation, spanning nearly 5,000 years and represents both the late Prehistoric and Archaic cultures. Archaeological sites in the area include a variety of prehistoric and historic sites, reflecting the preference for prominent drainages.

A large number of acres in the region of the study area were devoted to grazing of mission herds shortly after the arrival of Spanish missionaries and soldiers in San Diego. Settlement in this region did not occur until the 1860's when land became available through purchase of homesteading. Widely scattered farmsteads were found throughout the region where dirt roads connected the farms.

According to Stein (1975), Beeler Canyon was named after Julius Buehler, a German immigrant who acquired 500 acres through homesteading before 1900. Early map research shows that few farms were established in the Beeler Canyon area until the early 1900's.

❑ EXISTING CONDITIONS - MONTECITO SUB-PROJECT

The Montecito sub-project site consists of 278 acres of unimproved land, with the exception of one occupied single family residence located in the northern portion of the property. The site primarily lies on the north-facing slopes of Beeler Canyon that is an east-west oriented drainage system that empties into Poway Creek. Beeler Canyon is characterized by steep slopes and gullies cut into the non-marine sedimentary deposits of the Poway Conglomerate.

Based on the Montecito records research, there were two recorded isolated flakes (SDI-I-788 and SDI-I-789), but they were not relocated during the survey conducted by BFS&A. As part of the site-specific cultural resources survey, 20 shovel tests were placed in areas considered to have the potential for resources. As a result of the 20 shovel tests, one artifact was recovered, without the presence of any other cultural or ecofactual materials. Based on the negative results of the surveys, it is concluded that no cultural resources are located within the boundaries of the Montecito property.

❑ EXISTING CONDITIONS - SYCAMORE ESTATES SUB-PROJECT

The Sycamore Estates sub-project site consists of approximately 2,132 acres of land, portions of which have been developed with defense-related manufacturing uses. The Sycamore Estates area includes similar topography as the Montecito site such as ridgelines, knolls and associated drainages and canyons.

Six sites and three isolates were identified by previous studies in the Sycamore Estates sub-project area, and two additional sites and eleven isolates were identified during the cultural resources survey conducted by KYLE CONSULTING (see Appendix H3). These eight identified sites are described below. As noted below, the sites primarily contain large habitation sites, prehistoric campsites, prehistoric lithic scatter/quarry locations, bedrock milling sites and historic structures and trash scatters. A description of the identified isolates can be found in Appendices H3 and H5 to this EIR.

Site CA-SDI-13829H: This site was originally recorded as two sheds and a surface trash deposit that contains purple glass fragments that indicate historic age, recent material, farm equipment and two metate fragments. The site was re-examined by KYLE CONSULTING in 1999, which documented that the eastern shed appears to be in its original location, as evidenced by a small concrete slab at the entrance of the doorway. Along with the farm equipment, additional miscellaneous metal fragments and windowpane glass were noted. The metates were not relocated. Significance testing determined that the site is not significant.

Site CA-SDI-13834: This site is a small low density lithic scatter composed of two pieces of debitage and one test cobble. This site is located on the surface of the cobbly loam soil which has little or no subsurface soil deposition. CA-SDI-13834 is identified as not significant, based

on the presence of only three artifacts, the improbability that subsurface deposit would be present and the lack of potential to address regional research questions. No additional work is recommended for this site and the site is not regarded as significant.

Site CA-SDI-14027H: This site is an historic structure with an associated trash deposit and is identified as potentially significant. The site appears to have a potential for providing information relevant to the development of rural life in the county of San Diego in terms of regional research questions. The research potential is based on the probability that the site can provide information relative to rural economic and social status that could be revealed through the study of material culture.

Site CA-SDI-14028: This site is sparse lithic scatter composed of approximately 20 pieces of debitage and one scraper. These artifacts are scattered across a ridge in an area approximately 4 meters by 50 meters in size. The ridge has been cut on the north side for construction of a paved road and is heavily graded on the south side. The artifacts are located on the surface of the native cobbly loam soil and there is little potential for a subsurface deposit. Based on the disturbance, lack of soil deposition, the sparseness of the lithic scatter, and the lack of potential to address regional research questions, this site is identified as not significant and no additional work is recommended for this site.

Site CA-SDI-14029: This site is sparse lithic scatter consisting of four pieces of volcanic debitage, four pieces of quartzite debitage, one quartzite core, one quartzite flake tool, one volcanic scraper fragment, and one volcanic retouched flake. The artifacts are located on the top of a large ridgeline in a 400 square meter area. A cut bank is present on the north side of an access road that extends along the length of the ridge. Large areas north and south of the road have been graded. The artifacts are located on the surface of the native cobbly loam soil and there is little potential for a subsurface deposit. Based on disturbance, lack of soil deposition, the sparseness of the lithic scatter, and the lack of potential to address regional research questions of this site is identified as not significant and no additional work is recommended for this site.

Site CA-SDI-14037: This site is an historic structure with an associated trash deposit and is identified as not significant. The site appeared to have a potential for providing information relevant to the development of rural life in the county of San Diego in terms of regional research questions. The research potential is based on the probability that the site can provide information relative to rural economic and social status that could be revealed through the study of material culture.

Site CA-SDI-15158: This site is a prehistoric lithic scatter/quarry consisting of approximately 150 pieces of debitage as well as worked and tested cobbles of several colors and grades of quartzite located in an area approximately 35 meter east/west and 30 meter north/south in size. In addition, approximately 10 volcanic debitage pieces were also noted in the cultural resources survey report (see Appendix H3). Testing determined that the site does not meet the criteria for significance because it does not have the potential to address regional research questions

regarding lithic tool production. Testing and analysis revealed the majority of the cultural material has been removed from the site. CA-SDI-15158 is therefore identified as not significant and no additional work is recommended for this resource.

Site CA-SDI-15159H: This site consists of several hundred pieces of metal fragments. The majority of metal fragments are riveted aluminum with some heavier iron pieces and scores of munitions. The munitions consist of .50 caliber whole and fragmented shells, all of which appear to have been drilled to prevent firing. Preliminary research indicates that this may be the site of a WWII era training airplane crash. The small fragments at the site have been studied and cannot provide enough information to answer significant research questions. No additional work or excavation is recommended for this site, as it is considered not significant.

Isolates: Eleven isolates (SDM-W-5698, P-37-014118, P-37-014121, P-37-017181, P-37-017182, P-37-017183, P-37-017184, P-37-017185, P-37-017186, P-37-017187, P-37-017188) have been identified within the study area during previous work and the current study. Isolates are identified under the City of San Diego and CEQA guidelines as not significant and no additional work is recommended for these resources.

EXISTING CONDITIONS - OFF-SITE GRAVITY SEWER ALIGNMENT (DESIGN OPTION)

If the off-site gravity sewer option is selected for implementation, an off-site gravity sewer line would be constructed from the project site's northwestern boundary to the intersection of Pomerado Road and Oak Knoll Road. The entire length of the off-site gravity sewer would be approximately 9,880 feet, along which a 20-foot-wide total disturbance area is assumed for the evaluation impacts. The gravity sewer lines would be located in either existing roadway rights-of-way, or would be placed in easements. No cultural resources were identified by the record search or field study conducted by Kyle Consulting within the study area affected by the off-site gravity sewer option. No additional cultural resource work is recommended.

4.9.2 IMPACT ANALYSIS

Issue 1: *Would the proposed project adversely affect a prehistoric or historic archaeological site or religious or sacred uses?*

Significance Criteria

The significance criteria listed in Section 15064.5 of the 1999 CEQA Guidelines was used in determining the significance of the Project's and sub-projects' impacts to archeological and historical resources. According to Section 15064.5(c)(1) of the CEQA Guidelines: "if a project will impact an archaeological site, a lead agency shall first determine whether the site is an historical resource, as defined in subsection (a)." Section 15064.5 (c)(4) states: "if an archaeological resource is neither a

unique archaeological nor an historical resource, the effects of the project on those resources shall not be considered a significant effect on the environment.”

Impact Analysis

MONTECITO SUB-PROJECT

As discussed above under Existing Conditions, no cultural resource sites are located on the Montecito sub-project site. Therefore, development of the site as proposed by the Precise Plan and the proposed Montecito PRD and VTM would not impact important cultural resources. No impacts would occur.

SYCAMORE ESTATES SUB-PROJECT

Testing conducted within the Sycamore Estates sub-project resulted in the conclusions that eight cultural resources exist, seven of which are not significant and one of which (Site CA-SDI-14027H) is potentially significant but could not be fully studied due to its inaccessibility.

OFF-SITE GRAVITY SEWER ALIGNMENT (DESIGN OPTION)

No cultural resources exist within the alignment; therefore, impacts would not occur.

Significance of Impacts

MONTECITO SUB-PROJECT

Because no cultural resources are located on the Montecito sub-project site, impacts would not occur.

SYCAMORE ESTATES SUB-PROJECT

CA-SDI-14027H located within the project area is identified as potentially significant, but could not be accessed.

OFF-SITE GRAVITY SEWER ALIGNMENT (DESIGN OPTION)

Because no cultural resources are located along the alignment, impacts would not occur.

Mitigation, Monitoring and Reporting Program

MONTECITO SUB-PROJECT

Cultural resources impacts would not occur; therefore, no mitigation is required.

□ SYCAMORE ESTATES SUB-PROJECT

The following mitigation measures shall be incorporated to mitigate potentially significant direct impacts to Site CA-SDI-14027H to below a level of significance.

- 4.9-1: Prior to the recordation of the first final map and/or issuance of the first grading permit, the applicant shall provide a letter of verification to the Environmental Review Manager of Land Development Review (LDR) stating that a qualified archaeologist and/or archaeological monitor, as defined in the City of San Diego Historical Resources Guidelines, have been retained to implement the monitoring program. The requirement for archaeological monitoring shall be noted on the grading plans. All persons involved in the archaeological monitoring of the project, shall be approved by LDR prior to the start of monitoring. The applicant shall notify LDR of the start and end of construction.
- 4.9-2: The qualified archaeologist shall attend any preconstruction meetings to make comments and/or suggestions concerning the archaeological monitoring program with the construction manager.
- 4.9-3: The qualified archaeologist or archaeological monitor shall be present on site full-time during grading of native soils in and around CA-SDI-14027H.
- 4.9-4: When requested by the archaeologist, the Project Engineer shall divert, direct or temporarily halt ground disturbance activities in the area of discovery to allow evaluation of potentially significant cultural resources. The archaeologist shall immediately notify LDR staff of such finding at the time of discovery. The significance of the discovered resources shall be determined by the archaeologist, in consultation with LDR and the Native American community. LDR must concur with the evaluation before grading activities in the area of discovery will be allowed to resume. Any human bones of Native American origin shall be turned over to the appropriate Native American group for reburial.
- 4.9-5: All cultural materials collected shall be cleaned, catalogued, and permanently curated with an appropriate institution. All artifacts shall be analyzed to identify function and chronology as they relate to the history of the area. Faunal material shall be identified as to species and specialty studies shall be completed, as appropriate.
- 4.9-6: Prior to the release of the grading bond, a monitoring results report and/or evaluation report, if appropriate, which describes the results, analysis, and conclusions of the archaeological monitoring program (with appropriate graphics) shall be submitted to and approved by the Environmental Review Manager of LDR. For significant cultural resources, a Research Design and Data Recovery Program shall be included as part of the evaluation report. A mitigation report for significant cultural resources, if required, shall be submitted to and approved by the Environmental Review Manager of LDR prior to the release of the grading bond.

OFF-SITE GRAVITY SEWER ALIGNMENT (DESIGN OPTION)

Cultural resources impacts would not occur; therefore, no mitigation is required.

4.10 PALEONTOLOGICAL RESOURCES

4.10.1 EXISTING CONDITIONS

Section 4.4, GEOLOGY/SOILS, of this EIR describes the geologic units and geologic condition of the project site. Three geologic formations were mapped by GEOCON in the Precise Plan area, including Eocene-aged Stadium Conglomerate, Pomerado Conglomerate and Cretaceous-age igneous granitic rock of the Southern California Batholith. The Montecito sub-project site is entirely underlain by Stadium Conglomerate, and all three geologic formations underlie the Sycamore Estates sub-project site.

The Stadium Conglomerate formation consists of very dense partially to well-cemented cobble conglomerate. According to the document *Paleontological Resources: County of San Diego* published by the San Diego Natural History Museum, Department of Paleontology (1994), the Stadium Conglomerate Formation (Cypress Canyon Member) has produced diverse and well-preserved remains of terrestrial vertebrates and is assigned a high paleontological resource sensitivity. The Pomerado Conglomerate formation exceeds 150 feet in thickness on the site and primarily occurs above approximately 900 feet AMSL in elevation. It is a massive cobble conglomerate lithologically similar with the Stadium Conglomerate, and also has a high paleontological resource sensitivity.

Deeply weathered granitic rocks underlie limited areas within the east-central portion of the Sycamore Estates sub-project site. The granitic rock is primarily composed of granodiorite and aplite. As observed in exposed rock outcrops, the granodiorite is highly altered resulting in development of a sandy matrix which incorporates large boulders of fresh rock. Granitic rock has zero paleontological resource sensitivity.

4.10.2 IMPACT ANALYSIS

Issue 1: *Would the proposed project adversely impact paleontological resources?*

Significance Criteria

According to the City of San Diego's Paleontological Guidelines, impacts to paleontological resources resulting from grading and construction are considered potentially significant if the project proposes grading in an area having a moderate to high paleontological resource sensitivity as defined by *Paleontological Resources: County of San Diego* and meets the following conditions:

- a. The resource potential of the geologic formation underlying the site is moderate and the grading quantity exceeds 2,000 cubic yards and 10 feet in depth.

- b. The resource potential is high and the grading quantity exceeds 1,000 cubic yards and 10 feet in depth.

Impact Analysis

Montecito Sub-Project

As stated above, the Montecito sub-project site is underlain by the Stadium Conglomerate Formation, which exhibits a high resource sensitivity. Implementation of the proposed Precise Plan and the Montecito PRD and VTM would impact potentially important paleontological resources in the Stadium Conglomerate Formation. As discussed in Section 4.2, LANDFORM & VISUAL QUALITY, grading quantities on the Montecito sub-project site would exceed 2,000 cubic yards and would result in disturbance greater than 10 feet in depth. Thus, impacts to paleontological resources that could be present in the on-site Stadium Conglomerate Formation would be potentially significant and mitigation is required.

Sycamore Estates Sub-Project

The Sycamore Estates sub-project site is underlain by the Stadium Conglomerate and Pomerado Conglomerate Formations, which have a high resource sensitivity and by igneous granitic rock, which has a zero resource sensitivity. Implementation of the proposed Precise Plan and the Sycamore Estates PRD and VTM would impact potentially important paleontological resources in the Stadium Conglomerate and Pomerado Conglomerate Formations. As discussed in Section 4.2, LANDFORM & VISUAL QUALITY, grading quantities on the Sycamore Estates sub-project site would exceed 2,000 cubic yards and would result in disturbance greater than 10 feet in depth. Thus, impacts to paleontological resources that could be present in the on-site Stadium Conglomerate and Pomerado Conglomerate Formations would be potentially significant and mitigation is required. If the gravity sewer design option is implemented, off-site paleontological impacts could occur during trenching operations, which would be regarded as a potentially significant impact and mitigation is required.

Off-Site Gravity Sewer Alignment (Design Option)

As a design option of the proposed Project, a gravity sewer line is proposed through the City of Poway, from the project site's northwestern boundary to the intersection of Pomerado Road and Old Knoll Road. According to the City of Poway's General Plan Geologic Formations exhibit, the off-site gravity sewer alignment is underlain by Pomerado Conglomerate and alluvium. The Pomerado Conglomerate formation has a high paleontological resource sensitivity.

Significance of Impacts

Implementation of the *Rancho Encantada* Precise Plan, the Montecito PRD and VTM and the Sycamore Estates PRD and VTM would have the potential for significant impacts to paleontological resources in areas proposed for grading and off-site sewer improvements.

Mitigation Measures, Monitoring and Reporting Program

The following measures would be implemented to mitigate impacts to paleontological resources. These measures are required for all areas of the Montecito and Sycamore Estates sub-project sites and off-site areas in which grading is proposed in areas underlain by either the Stadium Conglomerate or Pomerado Conglomerate formation.

- 4.10-1: ~~Prior to the recordation of the first final map and/or~~ issuance of the first grading permit, the applicant shall provide a letter of verification to the Environmental Review Manager of Land Development Review (LDR) stating that a qualified paleontologist and/or paleontologist monitor, as defined in the City of San Diego Paleontological Guidelines, have been retained to implement the monitoring program. The requirement for paleontological monitoring shall be noted on the grading plans. All persons involved in the paleontological monitoring of this project shall be approved by LDR prior to the start of monitoring. The applicant shall notify LDR of the start and end of construction.
- 4.10-2: The qualified paleontologist shall attend any preconstruction meetings to make comments and/or suggestions concerning the paleontological monitoring program with the construction manager.
- 4.10-3: The paleontologist or paleontological monitor shall be on site full-time during the initial cutting of previously undisturbed areas. Monitoring may be increased or decreased at the discretion of the qualified paleontologist, in consultation with LDR, and will depend on the rate of excavation, the materials excavated, and the abundance of fossils.
- 4.10-4: When requested by the paleontologist, the Project Engineer shall divert, direct, or temporarily halt construction activities in the area of discovery to allow recovery of fossil remains. The paleontologist shall immediately notify LDR staff of such finding at the time of discovery. LDR shall approve salvaging procedures to be performed before construction activities are allowed to resume.
- 4.10-5: The paleontologist shall be responsible for preparation of fossils to a point of identification curation as defined in the City of San Diego Paleontological Guidelines and submittal of a letter of acceptance from a local qualified curation facility. Any discovered fossil sites shall be recorded by the paleontologist at the San Diego Natural History Museum.
- 4.10-6: Prior to the release of the grading bond, a monitoring results report, with appropriate graphics, summarizing the results, analysis, and conclusions of the paleontological monitoring program shall be submitted to and approved by the Environmental Review Manager of LDR.

Implementation of the above mitigation measures would reduce direct paleontological resource impacts to below a level of significance; however, cumulative impacts would remain significant and unmitigable.

4.11 PUBLIC SERVICES

Public services are those functions which serve residents on a community-wide basis. These services include schools, library, law enforcement, fire protection, water, sewer, solid waste, and utilities. Future residents of and visitors to the proposed *Rancho Encantada* project would require use of these services and facilities. This section focuses on the potential impacts the project may have upon these various public services.

4.11.1 EXISTING CONDITIONS

FIRE PROTECTION

The *Rancho Encantada* project area is located within the service area of the City of San Diego's Fire Department. The City's Progress Guide and General Plan states that fire stations should be sited to provide rapid response time within urbanized areas. To provide adequate fire protection to the community, the Fire Department strives to provide a six-minute response time to areas in need of service and a 10-minute response time for paramedic ambulances throughout the City.

There are five fire stations located in the vicinity of the project site. Fire Station No. 51 is located at 13050 Community Road in the City of Poway, and is currently the primary fire station serving the project area with a 5.4 minute response time to the western boundary of the project site via Pomerado Road. Other responding stations that provide service to the site are: 1) Engine Company 42, located at 12110 World Trade Drive, with a 9.2 minute response time to the western portion of the site; 2) Truck Company 40, located at 13393 Salmon River Road, with a 17.4 minute response time to the western portion of the site; and 3) Battalion 40, located at 13393 Salmon River Road with a 17.4 minute response time to the western portion of the site. Existing response times are slightly longer to reach the Sycamore Estates portion of *Rancho Encantada*, as the sub-project site's access is Beeler Canyon Road rather than Pomerado Road.

Engine Company 37 is temporarily located at 10750 Scripps Lake Drive and has a 6.3 minute response time to the project site. Engine Company 37 will be accommodated by a new permanent fire station, Fire Station 37, located at Spring Canyon Road and Blue Cypress Drive, which is tentatively scheduled to be in service by November 2000, and prior to development of the proposed Project. Fire Station 37 will serve as the primary fire station for the *Rancho Encantada* project site. Response time from new Fire Station 37 to the western boundary of the project site is expected to be under two minutes.

POLICE PROTECTION

The City's Progress Guide and General Plan identifies the Police Facilities Plan as the resource document for Police Department standards. The Police Facilities Plan establishes a seven-minute

average response time as a Department goal. The Progress Guide and General Plan recommends that stations be located near the geographic centers of areas to be served and that the stations have access to major streets and freeways. The City of San Diego presently maintains a city-wide ratio of 1.65 sworn personnel per 1,000 residents.

The San Diego Police Department's Northeastern Command Area located in the Rancho Penasquitos community at 13396 Salmon River Road, provides police protection for the project vicinity. The City of San Diego is divided into "service areas" for patrol purposes, and the project site is located within Beat 241 of the Scripps Mesa Service Area. In addition to the Northeastern Command, storefronts that service the project area are Carmel Mountain Ranch located at 12125 Alta Carmel Court #350, Mira Mesa located at 9225 Mira Mesa Boulevard #103, Rancho Bernardo Center Drive located at 17110 Bernardo Center Drive and Diamond Gateway located at 10175 Rancho Carmel.

The Service Area employs 108 sworn officers of all ranks, not including non-sworn administrative personnel or volunteers or Retired Senior Volunteer Patrol (RSVP). The average response time to the western project boundary via Pomerado Road for an emergency call in Beat 241 is 9.2 minutes. Response time to the eastern portion of the project site via Beeler Canyon Road would be slightly longer. The average response time for an emergency call from the overall Northeastern Command area is 9.4 minutes. In Beat 241, the average response time for non-emergency calls is 45.15 minutes. The average response time within the larger Northeastern Command area is 40.1 minutes for the four stages of priority calls that are based on the level of importance.

□ LIBRARY FACILITIES

The City of San Diego library system is comprised of a central library located in downtown San Diego and a series of branch libraries throughout the City. Planning for new branch libraries is based on a standard of serving 18,000-20,000 residents at the time of construction and 30,000 residents within 20 years after the branch opens. The *Rancho Encantada* project would be served by the Scripps Ranch Library that is located at 10301 Scripps Lake Drive in the City of San Diego. This library operates Monday and Wednesday 12:00- 8:00 p.m. and Tuesday, Thursday, Friday and Saturday 9:30 a.m-5:30 p.m. The Scripps Ranch Library was built in 1993 and is 21,700 square feet. The staffing level is 8.8 full-time employees. The library holds approximately 85,000 bar-coded items that includes books and other media.

The San Diego library system uses the National Standard, which is two books or items per capita for assessing the adequacy of library facilities. This National Standard allows the existing book stock to meet the needs of the City of San Diego's population.

Other libraries that could service the project site include the Carmel Mountain Ranch Library located at 12095 World Trade Drive that is northwest of the project site and the City of Poway Community Library that is to the north. The Poway Community Library is a branch of the San Diego County library system and is located at 13137 Poway Road, approximately 2.5 miles north of the project site.

LEGEND

FIRE STATIONS

- A FIRE STATION NO. 51
- B ENGINE CO. 37
- C ENGINE CO. 42
- D TRUCK CO. 40
- E BATTALION 40
- F FIRE STATION NO. 37 - UNDER CONSTRUCTION

POLICE STATIONS

- G S.D.D.D. NORTHEASTERN COMMAND AREA
- H CARMEL MOUNTAIN RANCH
- I MIRA MESA
- J RANCHO BERNARDO CENTER DRIVE
- K DIAMOND GATEWAY

LIBRARIES

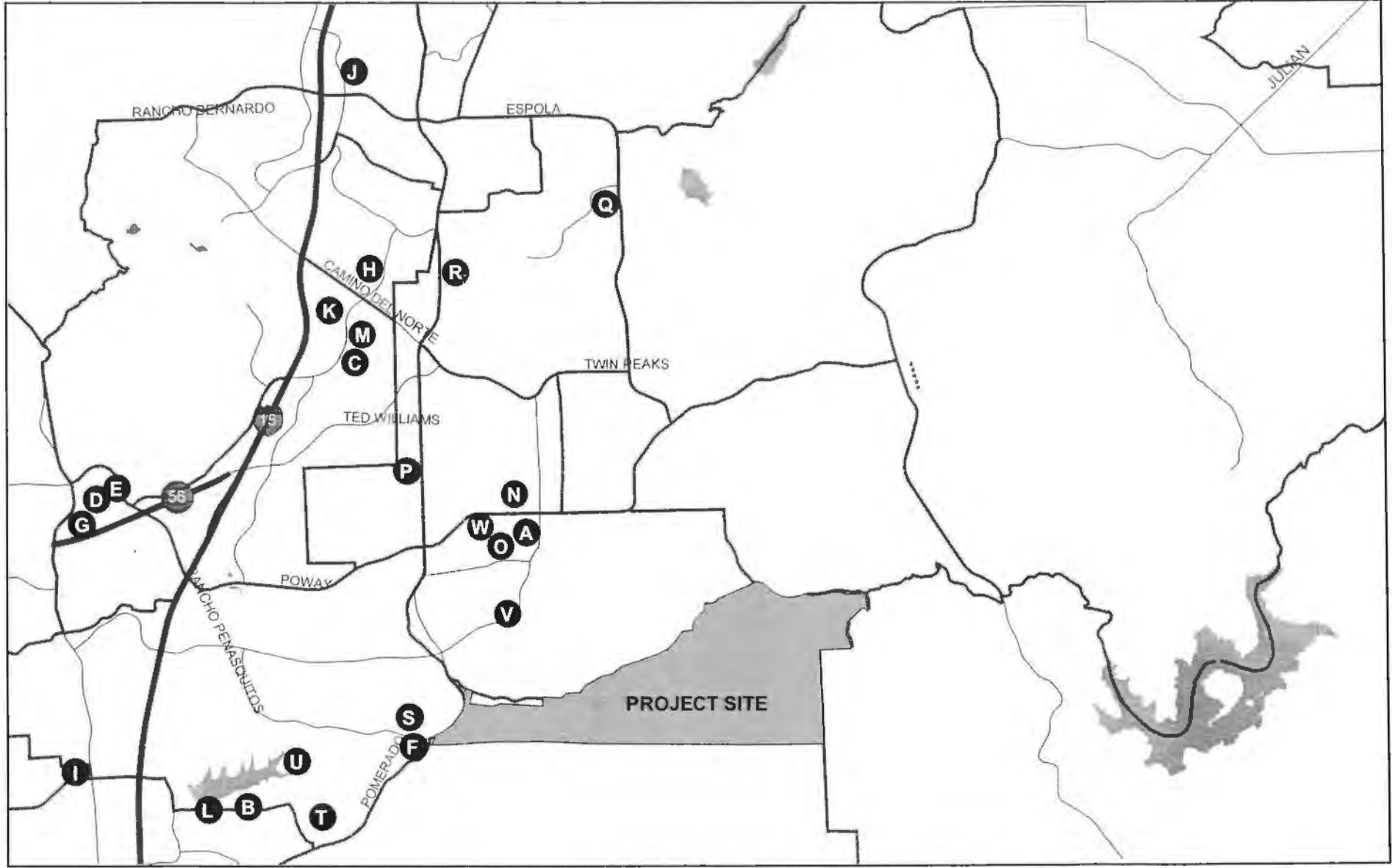
- L SCRIPPS RANCH
- M CARMEL MOUNTAIN RANCH LIBRARY
- N POWAY COMMUNITY LIBRARY

SCHOOLS

- O VALLEY ELEMENTARY SCHOOL
- P MEADOWBROOK MIDDLE SCHOOL
- Q POWAY HIGH SCHOOL
- R RANCHO BERNARDO HIGH SCHOOL

PARKS

- S CYPRESS CANYON PARK
- T JERABEK PARK
- U LAKE VIEW PARK
- V POWAY SPORTS PARK
- W POWAY COMMUNITY PARK



SOURCE: THE THOMAS GUIDE, 1996

**Figure 4.11-1
EXISTING PUBLIC FACILITIES
LOCATION MAP**



Also, the Mira Mesa and Rancho Penasquitos Branch Libraries are located in the general area, on the western side of Interstate 15.

❑ SCHOOLS

The *Rancho Encantada* project site is located within the jurisdiction of the Poway Unified School District (PUSD). Capacity and enrollment information for existing school facilities that service the project area are summarized in Table 4.11-1, *Enrollments & Enrollment Capacities for Schools in the PUSD Serving the Project Area*. Based on 1999/00 enrollment, Valley Elementary School is currently fourteen percent over capacity, Meadowbrook Middle School is four percent under capacity, and Poway High School is 77 percent over capacity and Rancho Bernardo High School is 51 percent over capacity.

**Table 4.11-1
CURRENT ENROLLMENTS & ENROLLMENT CAPACITIES FOR SCHOOLS IN THE
POWAY SCHOOL DISTRICT SERVING THE PROJECT AREA**

SCHOOL	TOTAL PERMANENT CAPACITY	ENROLLMENT (FALL 1999)	% OVER/UNDER CAPACITY
Elementary School (K-5)			
Valley Elementary	721	824	14%
Middle School (6-8)			
Meadowbrook	1,420	1,360	-4%
High School (9-12)			
Poway High	1,873	3,316	77%
Rancho Bernardo High	2,100	3,173 ¹	51%

Source: Poway Unified School District, January 20, 2000

1. Indicates enrollment as of Fall 2000.

❑ PUBLIC PARKS

Development of recreational opportunities in the project area are regulated by the City of San Diego Progress Guide and General Plan. The Progress Guide and General Plan provides flexible guidelines and standards for population-based parks and facilities. The guidelines and standards are designed to adapt to changing community needs and/or desires. Specifically identified in the Progress Guide and General Plan are guidelines for neighborhood parks, community parks and resource-based parks. As stated in the Plan, neighborhood park design should be determined by neighborhood characteristics and generally provide for multipurpose courts, play areas and picnic areas. They should serve a resident population of 3,500 to 5,000 within a radius of 0.5 miles and typically encompass ten acres. A neighborhood park may be reduced by five useable acres when sited adjacent to a school. Community

park design should provide for a wide range of activities such as those accommodated by athletic fields and recreation buildings, and serve a population of 18,000 to 25,000 within a 1.5-mile radius. Community parks should ideally consist of no less than 20 acres. Resource-based parks should be located and sized based on distinctive scenic views, natural features and/or cultural features. Development of and uses associated with resource-based parks are dependent upon the specific resources involved.

The nearest existing neighborhood and community park facilities in the City of San Diego are located west of the project site within the communities of Scripps Miramar Ranch and Miramar Ranch North. Public parks also are located north of the project site in the City of Poway. The Scripps Miramar Ranch Community Plan identifies a minimum of 51 public park acres in the community and the Miramar Ranch North Community Plan calls for 41 acres of public parks. The nearest public park is Cypress Canyon Park located in the community of Scripps Miramar Ranch, just west of Pomerado Road, southwest of the project site. Other public parks in the vicinity of the project site include Jerabek Park and Lake View Park in Scripps Miramar Ranch and Poway Sportspark and Poway Community Park in the City of Poway.

□ SEWER

The Metropolitan Sewer System (METRO) which is owned by the City of San Diego, provides sanitary sewer service to the project vicinity. As part of the tributary to this system, there is an existing 8-inch sewer line in Pomerado Road, west of the Precise Plan area. Further north in the vicinity of Scripps Poway Parkway this 8-inch main connects to an existing 15-inch main, which changes to 18-inches and continues north in Pomerado Road. These three sections of main (Scripps Miramar Sewer Mains) are within the City of Poway. Ultimately this system turns westward and continues along Poway Road. On February 2, 1981, the City of San Diego and the City of Poway entered into an agreement known as the *"Pomerado Relief Trunk Sewer Agreement of 1980 between the City of San Diego and the Pomerado County Water District"* regarding the Scripps Miramar Ranch sewer line. In 1989, a second amendment to that agreement was approved which addresses sewage originating in the City of San Diego discharging through sewer mains in the City of Poway and traveling back into the City of San Diego to the METRO system. Under Section 6 of this agreement, it was acknowledged that the "Beeler Canyon" area would be developed in the future and that its sewer would be incorporated into the Scripps Miramar Ranch sewer. In this agreement, sewage would originate in the City of San Diego, discharge through sewer mains in the City of Poway and then back into the City of San Diego. The Scripps Miramar Ranch sewer mains, described initially above, connect to trunk sewers downstream in Old Knoll Road and Poway Road in the City of Poway, before returning to the City of San Diego.

The Metropolitan Wastewater Department (MWD) treats approximately 190 million gallons of wastewater and more than 135 tons of dewatered biosolids a day. Process units at the Point Loma wastewater treatment plant include grit removal tanks, sedimentation tanks, digesters, and a sludge pumping station which is a link to the recently constructed Metro Biosolids Center. The Metro Biosolids Center was constructed in 1998 as a result of a California Coastal Commission requirement. The facility is located between State Route 52 and MCAS Miramar, adjacent to the Miramar Landfill.

The Metro Biosolids Center processes raw and digested solids to produce a substance known as biosolids. Construction of the Center required construction of two pipelines to feed the MBC facility: a 17-mile Miramar Pipeline from the Point Loma Wastewater Treatment Plant and a five-mile pipeline from the North City Water Reclamation Plant.

□ WATER

The Metropolitan Water District of Southern California (MWD) has supplied San Diego County, through the San Diego County Water Authority (SDCWA), with a source of potable water for the past 45 years. Depending on local weather conditions, typically 75 to 90 percent of San Diego County's water is imported. All SDCWA imported water is currently obtained from MWD, but a historic water transfer agreement with the Imperial Irrigation District (IID) is expected to begin in 2002. MWD's sources of imported water are the Colorado River and from sources in Northern California via the State Water Project. Colorado River water is imported by MWD via the 242-mile long Colorado River Aqueduct. Water from Northern California rivers is imported to MWD via the State Water Project's 444-mile California Aqueduct. The SDCWA takes delivery of water from MWD approximately six miles south of the Riverside-San Diego County line and transports it through five large-diameter pipelines to its member agencies. These agencies in turn deliver water directly to homes, businesses and other users. Local water sources account for five to 25 percent of the water supply and include surface water, wells, and reclamation.

The project vicinity is supplied with water by the City of San Diego. The Precise Plan area is located adjacent to the City of San Diego's Scripps-Miramar Ranch Water Service Area. The majority of the development in the Scripps-Miramar Ranch area lies within the 1020 pressure zone. Two reservoirs are located within the 1020 service system - the 4.5 million gallon (MG) Miramar Ranch North Reservoir and the 3.2-MG Scripps Ranch Reservoir. Pressure zones above the 1020 zone are served by closed system pumping stations. Pressure zones below the 1020 zone are served through pressure reducing stations. Several water mains are located near the project site that can convey potable water to the Precise Plan area, including a 12-inch pipeline near the intersection of Spring Canyon Road and Pomerado Road. This supply pipeline is part of the City's 1020 Zone service system.

Two water reservoirs are located on the Sycamore Estates sub-project site to serve the five on-site existing industrial use areas. Water to these reservoirs and to the five industrial use areas is supplied by the City of San Diego through water easements located on the Sycamore Estates sub-project site that connect to MCAS Miramar.

□ SOLID WASTE

The City of San Diego Environmental Services Department (ESD) is responsible for solid waste disposal in the project area. The ESD also ensures that all federal, state, and local mandates relating to waste management are met. The State of California has mandated (AB 939, 1989) that all cities reduce waste disposed of in landfills by 50% by the year 2000. The ESD collects and disposes of 1.3 million tons of waste annually in the City of San Diego; 55% of that amount comes from San Diego businesses and 25% from construction and demolition activities. To achieve the State's mandated waste

reduction, the ESD has implemented comprehensive recycling, hazardous materials management, code enforcement, and support programs.

The West Miramar Landfill, which is located on U.S. government property leased and operated by the City of San Diego, accepts non-hazardous solid wastes generated in the City of San Diego and surrounding areas. The landfill is located at 5180 Convoy Street. West Miramar Landfill encompasses 801.45 acres, of which 476.34 acres are permitted for disposal. Various projects have been initiated to increase the landfill capacity and thus extend the life of the landfill. Taking these projects into account, as of January 31, 1999, the total remaining capacity is projected to be 28.3 million cubic yards. The estimated remaining life of the landfill is approximately 11 years (Calendar Year 2011). This total capacity also reflects the assumption that the City will meet certain recycling and diversion goals. Additionally, the City is investigating potential landfill sites (Upper Sycamore, Oak, and Spring Canyons) to meet the City's future disposal needs after the closure of the Miramar Landfill. The current disposal needs of the city is 1,400,000 tons per year. The current average daily tonnage received is 3,622 tons per day, 361 days per year.

4.11.2 IMPACT ANALYSIS

Issue 1: Would the proposed project impact school, library and park facilities?

SCHOOLS

Significance Criteria - Schools

Impacts to public educational facilities are considered significant if the project would contribute students to a public school that is operating above capacity, or if the addition of project-generated students to a public school would cause the school's capacity to be exceeded.

Impact Analysis - Schools

A school-age population would be generated by development in *Rancho Encantada*, creating a demand for public education services and facilities. A generation factor is used to estimate the number of additional students a development would add to a school. This factor is defined as a number of students per dwelling unit. Table 4.11-2, *Estimated Student Generation*, summarizes the student generation projected for the Project. As shown, 831 school students are estimated to be generated by the proposed Project, with 255 students generated by the Montecito sub-project and 576 students generated by the Sycamore Estates sub-project.

**Table 4.11-2
ESTIMATED STUDENT GENERATION**

GRADE	GENERATION RATE FOR SINGLE FAMILY UNITS	NO. OF PROPOSED SINGLE FAMILY UNITS (SF)	GENERATION RATE FOR MULTI-FAMILY UNITS	NO. OF PROPOSED MULTI-FAMILY UNITS (MF)	NO. OF STUDENTS GENERATED (MF & SF)
MONTECITO SUB-PROJECT					
Elementary (K-5)	0.48	278	0.36	0	133
Middle (6-8)	0.18	278	0.12	0	50
High (9-12)	0.26	278	0.11	0	72
SYCAMORE ESTATES SUB-PROJECT					
Elementary (K-5)	0.48	557	0.36	106	306
Middle (6-8)	0.18	557	0.12	106	113
High (9-12)	0.26	557	0.11	106	157
Total					831

Generation rates provided by the Poway Unified School District, January 20, 2000

Absent an adopted development plan for the *Rancho Encantada* property, the school district assumes buildout of the property in accordance with its underlying zone designation for long-range school facility planning purposes. Because the Montecito sub-project site would not require rezoning, implementation of the Montecito sub-project would not generate students in excess of that assumed for the property by the school district. The Sycamore Estates sub-project, however, does require rezoning and as a result would generate an estimated 576 students, including 306 elementary school students, 113 middle school students, and 157 high school students, which is more than the approximately 80 students presently expected by the School District based on existing zoning.

Valley Elementary School Poway High School, and Rancho Bernardo High School which serve the project area, are operating above capacity. The total addition of 439 elementary school students to the Valley Elementary School and the addition of 229 students to either Poway High School or Rancho Bernardo High School would add to the overcrowding of existing school facilities. The addition of elementary and high school students to existing overcrowded conditions would result in a significant cumulative impact. The addition of 163 students to the Meadowbrook Middle School would result in an enrollment over the school's recommended capacity, which also is regarded as a significant cumulative impact (also refer to Section 5.0, CUMULATIVE EFFECTS).

As part of the proposed Precise Plan and the proposed Sycamore Estates PRD and VTM, an elementary school site is proposed on approximately 10 - 12 net acres in the west-central portion of the Sycamore Estates sub-project site. The 10 - 12 net acre site would be conveyed to the Poway Unified School

District for the construction of an elementary school. Once constructed, this on-site elementary school would provide capacity for approximately 500 - 800 students and would accommodate the 439 elementary school students generated by *Rancho Encantada* as well as students from portions of adjacent neighborhoods. The conveyance of this site to the Poway Unified School District would reduce the Project's cumulative impact on elementary school capacity to below a level of significance. If the Sycamore Estates sub-project is not developed or is not developed prior to development of the Montecito sub-project, cumulative impacts generated by the Montecito sub-project would be regarded as significant and mitigation would be required.

CEQA Guideline §15130 addresses the discussion of cumulative impacts from implementation of a project and the mitigation required. Under this guideline, a project's contribution is less than cumulatively considerable if the project is required to implement or fund its fair share of a mitigation measure or measures designed to alleviate the cumulative impact. In November of 1998, California voters approved Proposition 1A (1998, Senate Bill 50) which provides funding for school construction and removes the requirement that local jurisdictions provide for mitigation of school impacts. The State of California, through the State School Building Lease-Purchase Program, has provided much of the money for school districts to buy land and to construct, reconstruct, or modernize school buildings in the K-12 system. In order to receive money under Proposition 1A, school districts must meet certain requirements. Districts receive a higher priority for state funding of a project if they provide 50 percent of the project cost with local funds. Local school districts raise funds for school buildings in three main ways: 1) Local General Obligation Bonds; 2) Special Local Bonds (Known as "Mello-Roos" Bonds); and 3) Developer Fees. State law authorizes school districts to impose developer fees on new construction. These fees may be used only for construction and reconstruction of school buildings. This fee would apply to both the Montecito and Sycamore Estates sub-projects. Payment of the mitigation fee would supplement the funding provided by Proposition 1A and would constitute full mitigation by the Project of its share of impacts, thereby reducing the Project's cumulative impact on the Poway Unified School District.

The Poway Unified School District is currently instituting proceedings for the establishment of a school facilities improvement district (SFID) pursuant to Title 1, Part 10, Chapter 2 of the California Education Code. Should a SFID be established, the Project would be subject to an annual special tax for the purpose of modernization of existing schools that service the project area instead of paying the Proposition 1-A statutory mitigation fee. This also would reduce the Project's cumulative school impact to below a level of significance.

Significance of Impacts - Schools

Montecito Sub-Project

The addition of 72 students to either Poway High School or Rancho Bernardo High School, 50 students to Meadowbrook Middle School, and 133 students to Valley Elementary School would result in a significant cumulative impact due to overcrowding. The conveyance of an elementary school site by the adjacent Sycamore Estates sub-project to the Poway Unified School District would reduce Montecito's cumulative impact to elementary school capacity to below a level of significance. If the

Sycamore Estates sub-project is not developed, cumulative impacts to elementary school capacity would remain significant.

Sycamore Estates Sub-Project

The addition of 157 students to either Poway High School or Rancho Bernardo High School, 113 students to Meadowbrook Middle School, and 306 students to Valley Elementary School would result in a significant cumulative impact due to overcrowding.

Mitigation Measures, Monitoring and Reporting Program - Schools

The following mitigation measure would reduce cumulative impacts of the Project and each sub-project on middle school and high school capacity to below a level of significance. This measure also would reduce cumulative impacts on elementary school capacity of the Montecito sub-project if the Sycamore Estates sub-project is not developed.

The following measure applies to both the Montecito and Sycamore Estates sub-projects:

4.11-1: Prior to the issuance of each residential building permit(s), the sub-project owner/permittee shall be required to pay statutory Senate Bill 50 fees in place for the requested building permit(s).

LIBRARIES

Significance Criteria - Libraries

Impacts to library facilities are considered significant if the project would increase the population of a community planning area and/or neighborhood that would result in exceeding the Progress Guide and General Plan standards for libraries. The City's Progress Guide and General Plan states libraries should be accessible, serving a maximum area of a two-mile radius.

Impact Analysis - Libraries

Development of the Montecito sub-project with 277 single-family homes and development of the Sycamore Estates sub-project with 557 single-family homes and 106 multi-family units would incrementally increase the demand for library services. The nearest branch library in Scripps Ranch is located west of the project site, and is within the General Plan's two-mile radius standard. The Scripps Ranch branch library would have enough books and staff to meet the new residential development proposed in *Rancho Encantada*. In addition, there also are several other libraries located in close proximity to the project site that would provide service to the project residents. These include the City of Poway Community Library and the Mira Mesa, Carmel Mountain Ranch and Rancho Penasquitos Branch Libraries.

Significance of Impacts - Libraries

Because existing branch libraries are adequate to service the proposed Project's and sub-projects' residents, impacts to library service would not be regarded as a significant direct or cumulative impact.

Mitigation Measures, Monitoring and Reporting Program - Libraries

Impacts would not be significant; therefore, mitigation is not required.

PUBLIC PARKS

Significance Criteria - Public Parks

Impacts to public parks are considered significant if 1) the project would increase the population within a community plan or neighborhood that exceeds that established by the City's Progress Guide and General Plan; or 2) if a resident population is located more than ½-mile from a neighborhood park or 1.5 miles from a community park.

Impact Analysis - Public Parks

For park planning purposes, the San Diego Municipal Code establishes a 3.7 persons per household (density) for single-family units and a 2.5 persons per household for multi-family units. Applying these density factors to the proposed Project, the Montecito PRD would generate 1,028 persons (278 x 3.7) and the Sycamore Estates PRD would generate 2,326 persons (557 x 3.7 + 106 x 2.5). In total, the *Rancho Encantada* Precise Plan would generate approximately 3,354 persons for park planning purposes. Applying the City's standard to provide 2.4 acres of active parks per 1,000 population, the proposed Precise Plan would generate the need for 8.05 acres of active park land, with 2.46 acres attributable to the Montecito sub-project and 5.59 acres attributable to the Sycamore Estates sub-project.

As part of the proposed Precise Plan and Sycamore Estates PRD and VTM, an approximate 4.0 net-acre public park site and a 10.0 - 12.0-acre elementary school site would be provided on-site. When parks are placed adjacent to public school sites, acreage reductions of the park are requested by the City. The provision of an approximate 4.0 net-acre public park site adjacent to an elementary school site would satisfy the public park requirement of both the Montecito and Sycamore Estates sub-projects, and impacts would not be significant. The on-site park and school site is planned central to the Precise Plan area, and would be accessible to all project residents via the proposed street, bicycle lane and sidewalk/trail network.

Alone, the Montecito sub-project would generate the need for 2.46 acres of park land. If the Sycamore Estates sub-project, containing the school/park site, is not developed, the Montecito sub-project would result in significant impacts to public parks. The Montecito sub-project owner/permittee would be required to pay into the City's park fee program to reduce public park impacts generated by the Montecito sub-project to below a level of significance.

Significance of Impacts - Public Parks

The proposed Precise Plan would generate the need for 8.05 acres of active park land, with 2.46 acres attributable to the Montecito sub-project and 5.59 acres attributable to the Sycamore Estates sub-project. If the park is located next to the school, a 4.0-acre park would be needed for both sub-projects combined. This is regarded as a significant direct impact.

Mitigation Measures, Monitoring and Reporting Program - Public Parks

Sycamore Estates Sub-Project

4.11-2: The Sycamore Estates sub-project owner/permittee shall convey an approximate 4.0 net-acre public park site next to a proposed school site, as shown in the Sycamore Estates PRD and VTM, a 8.05 net-acre public park site if the park is not adjacent to a school site, to the City of San Diego, prior to issuance of the 500th residential occupancy permit within the Sycamore Estates PRD.

Montecito Sub-Project

4.11-3: If development of the Sycamore Estates sub-project site is not assured through the recordation of a Final Map prior to the issuance of building permits for the Montecito sub-project, the Montecito sub-project owner/permittee shall pay into the Rancho Encantada Public Facilities Financing Plan (PFFP) prior to the issuance of building permits to cover its 2.46-acre park requirement.

With implementation of the above mitigation measures, impacts to public parks would be reduced to below a level of significance.

Issue 2: Are adequate fire and police services available to serve the development?

FIRE PROTECTION

Significance Criteria - Fire Protection

A significant impact to fire protection services would occur if: 1) the project would be located in an area outside of the City Fire Department's existing or planned six-minute service area, 2) if proposed roadways or parking lots would not accommodate turning radius standards for emergency vehicles, or 3) if the project would not comply with the City of San Diego's brush management guidelines.

Impact Analysis - Fire Protection

The Poway Fire Department Engine Company 51, located at 13050 Community Road in the City of Poway has a response time of 5.4 minutes to the main entrance of the project site at Pomerado Road. In addition, Fire Station 37 is under construction at Spring Canyon Road and Blue Cypress Drive, which is tentatively scheduled to be in service by November 1, 2000 and prior to development of the proposed Project. Fire Station 37 will serve as the primary fire station for the *Rancho Encantada* project site, with a response time to the western boundary of the project site of under two minutes; thus, impacts to the Montecito sub-project would not be significant provided that Fire Station 37 is in operation. Response times to the easternmost portions of the Sycamore Estates sub-project site may exceed the Fire Department's six minute response time goal, resulting in a potentially significant fire protection impact.

Proposed Rancho Encantada Parkway via Pomerado Road would be the primary access route within the project site. A secondary route also is proposed through the Sycamore Estates sub-project to connect proposed Rancho Encantada Parkway to Beeler Canyon Road. In both the Montecito and Sycamore Estates VTMs, emergency access routes are proposed to connect with Beeler Canyon Road. The Montecito VTM proposes an emergency access road from the north of Planning Area 3, through the open space area, to connect with Beeler Canyon Road. The Sycamore Estates VTM proposes an emergency access road from the north of Planning area 11, which also would connect to Beeler Canyon Road. These emergency access roads would be available to emergency personnel and equipment and also would serve as emergency ingress/egress routes for project residents.

The proposed *Rancho Encantada* Precise Plan allows for private, gated roadways within the project and within certain limits of the site. These private streets would be designed in accordance with City standards for roadway design, including turning radius standards for emergency vehicles. Upon reaching the site, emergency vehicles would be able to navigate the internal roadway system without difficulty.

A Brush Management Program is required by Section 6 of the City of San Diego Landscape Technical Manual and Appendix IIA of the Uniform Fire Code to reduce the risk of wildfire. Brush management is required along all development boundaries where structures would be located adjacent to natural open space. Both the Montecito and Sycamore Estates sub-projects' proposed PRDs include brush management plans, as previously shown in Figure 3-10, *Montecito PRD Brush Management Program*, and Figure 3-16, *Sycamore Estates PRD Brush Management Program*, in Chapter 3.0, PROJECT DESCRIPTION. As shown, a combination of two brush management zones are proposed in compliance with the City's Landscape Technical Manual. Zone 1 would consist of hardscape or permanently irrigated vegetation and would be accommodated on the development pads and outside of the MHPA. Zone 2 would consist of the selective thinning and pruning of the native plants. Vegetation clearing would be conducted consistent with City standards and regardless of ownership, maintenance of brush management in Zone 2 would be the responsibility of a property owners association or another private party. With implementation of the proposed brush management plans, fire protection impacts associated with wildfire hazard would be reduced to below a level of significance.

Significance of Impacts - Fire Protection**Montecito Sub-Project**

Because the Montecito sub-project site is located within the six minute response time goal from existing and planned fire stations, turning radius standards for emergency vehicles would be accommodated, and brush management standards would be met, fire protection impacts would not be significant. If Fire Station 37 is not in operation at the time building permits are issued, potentially significant impacts would occur to those structures outside of the six minute response area of Fire Station No. 51 in the City of Poway.

Sycamore Estates Sub-Project

Because portions of the Sycamore Estates sub-project site may be outside of the six minute response time goal from existing and planned fire stations, fire protection impacts would be considered significant.

Mitigation Measures, Monitoring and Reporting Program - Fire Protection**Montecito Sub-Project**

Fire protection impacts would not be significant, thus, mitigation is not required.

Sycamore Estates Sub-Project

4.11-4: Prior to the issuance of each building permits for each development phase, a fire response time analysis shall be submitted to the City's Environmental Review Manager for the building permit in question. The analysis shall take the presence of gated entries into consideration. If the structure is located outside of a six-minute response time from an existing ~~or planned~~ fire station, a fire sprinkler system shall be installed in the structure satisfactory to the Environmental Review Manager and the City Fire Marshall.

 POLICE PROTECTION**Significance Criteria - Police Protection**

A significant impact to police protection would occur if development of the project would cause the average response time of the Northeastern Command area to increase over existing conditions. The current average response time for an emergency call from the overall Northeastern Command area is 9.4 minutes.

Impact Analysis - Police Protection

Development of the *Rancho Encantada* project would result in an increased demand for police service that may require an increase in officers, equipment, and support personnel. Funding for police services is provided by the General Fund of the City of San Diego. Police protection is ordinarily extended to newly developed areas and funded as a function of the increased tax base. The proposed Project would create the need for additional police personnel, but would not create a need for new facilities.

The Police Facilities Plan for the City of San Diego establishes a seven-minute average response time as a Department goal. The average response time, however, for an emergency call from the overall Northeastern Command area which services the project area is 9.4 minutes. According to the Police Department (Pomeranz; August 1999), the proposed *Rancho Encantada* project site and nearby properties are currently reached by emergency personnel in approximately 9.2 minutes, which is 2.2 minutes over the response time goal, but under the average response time for the Northeastern Command. Land development inevitably results in a higher demand being placed on police services due to an increase in calls for service. Due to many complicated factors ranging from neighborhood crime rates, location in relation to surrounding land uses, demographic characteristics of new residents, etc., it is not until the new development is in place and begins to generate calls for police service is it possible to more accurately predict the level of demand that will be placed on the Police Department. The allocation of police officers by Command Area is based on the numbers of calls received (i.e., the Command Area experiencing the greatest number of calls is allocated the greatest number of officers). The adequacy of police service is a factor of community-wide importance that cannot be resolved on a project-specific basis. The proposed Project would impact the Police Department by increased demand for service, but impacts would not be regarded as significant.

Significance of Impacts - Police Protection

Because development of the proposed Project would not cause the existing response times for police services to increase, and because additional police officers and equipment are funded through the City's General Fund, impacts would not be regarded as significant.

Mitigation Measures, Monitoring and Reporting Program - Police Protection

Impacts to police protection services would not be significant; thus, mitigation is not required.

Issue 3: *Is adequate water and sewer service available to serve the development?*

WATER

Significance Criteria - Water

Impacts would be regarded as significant if the proposed project could not be supplied with adequate water service by existing and proposed facilities.

Impact Analysis - Water

The Metropolitan Water District of Southern California (MWD) supplies San Diego County, through the San Diego County Water Authority (SDCWA), with a source of potable water. Table 4.11-3, *Estimated Water Usage*, presents a summary of the projected water usage for the proposed Project. The City of San Diego Water Utilities Department requires projects to submit a comprehensive water facilities study. All required on- and off-site water facilities, as determined by the approved comprehensive water study, must be completed and accepted by the city prior to the occupancy of any buildings. A water study for the Montecito sub-project has been prepared by NOLTE & ASSOCIATES, INC., and is included in Appendix II of this EIR. A water study for the Sycamore Estates sub-project has been prepared by ROBERT BEIN, WILLIAM FROST & ASSOC. (RBF), and is included as Appendix I2 of this EIR. According to those studies, the proposed water systems have been designed to the City of San Diego Water and Sewer Design Guidelines dated September 8, 1994. Based on City guidelines, the water demand was computed using a population per dwelling unit (DU) of 3.5 and a residential flow of 150 gallons per capita day (GPCD).

□ Water Demand - Montecito Sub-Project

The analysis conducted by NOLTE for the Montecito sub-project states that 834 gallons per minute during a peak hour would be demanded by Montecito, and that the sub-project would have an average annual demand of 52.9 million gallons per year, or 145,500 gallons per day. Table 4.11-3, *Estimated Water Usage for the Montecito Sub-Project*, calculates the estimated water usage.

**TABLE 4.11-3
ESTIMATED WATER USAGE FOR THE MONTECITO SUB-PROJECT**

LAND USE	MAX # OF UNITS	DEMAND FACTOR	GALLONS PER DAY
SF Residential	277	525 gpd/du ¹	145,500

¹ Residential based on 3.5 people per dwelling unit and 150 gallons per capita per day.
Source: Nolte; January 2000

As noted above under Existing Conditions, a majority of existing development in the Scripps Miramar Ranch area is served by the 1020 pressure zone. The analysis conducted by NOLTE for the Montecito sub-project considered two options for water supply. Option 1 considers development of the Montecito sub-project and the adjacent Sycamore Estates sub-project, while Option 2 considers development of the Montecito sub-project without development of Sycamore Estates. Under Option 1, the Montecito sub-project proposes one connection to the 890 pressure zone at Legacy Road and three connection points to the 1020 Pressure Zone, one at Pomerado Road north of Legacy, one at Legacy Road, and one to the storage tank proposed as part of the Sycamore Estates sub-project. Under Option 2, two connections to the 1020 zone would be made, one at Pomerado Road north of Legacy Road, and one at Legacy Road. An illustration of the proposed water distribution system is shown in Figure 3-4, *Precise Plan Conceptual Water Plan*, in Chapter 3.0, PROJECT DESCRIPTION.

Because the Montecito sub-project site is not proposed to be rezoned, the development intensity proposed on the site (278 residential units) was anticipated in planning efforts for the Scripps Miramar Ranch water system, as documented in the "Miramar Ranch North Phasing Study" completed in 1990, including three addenda completed between 1990 and 1994. Because water supply was anticipated for the site, and because adequate water is available from the existing Scripps Miramar Ranch water system, water supply impacts would not occur.

□ **Water Demand - Sycamore Estates Sub-Project**

The analysis conducted by RBF for the Sycamore Estates sub-project calculates an average daily demand of 462,731 and an average annual demand of approximately 422 million gallons. Table 4.11-4, *Estimated Water Usage for the Sycamore Estates Sub-Project*, calculates the estimated water usage.

The Sycamore Estates sub-project would establish four pressure zones (zones 890, 1020, 1150, and 1250). Water supply to the sub-project is proposed through a connection with the Scripps Miramar Ranch 1020 pressure zone. This zone has 7.7 million gallons of storage and has the existing capacity to serve the project. In addition, an on-site Zone 1150 water storage reservoir is proposed to meet fire flow demands. The on-site water system is proposed to consist of a network of pipelines, connecting pumping stations, pressure reducing stations, and a water storage reservoir. The pumping stations would boost flow to the different water service pressure zones located within the Sycamore Estates sub-project site. An illustration of the proposed water distribution system is shown in Figure 3-4, *Precise Plan Conceptual Water Plan*, in Chapter 3.0, PROJECT DESCRIPTION. Because adequate water is available from the existing Scripps Miramar Ranch water system and the proposed on-site reservoir, water supply impacts would not occur.

**Table 4.11-4
ESTIMATED WATER USAGE FOR THE SYCAMORE ESTATES SUB-PROJECT**

LAND USE	DEVELOPMENT UNIT	DEMAND FACTOR	GALLONS PER DAY
SF Residential	557 units	525 gpd/du ¹	292,425
SF Residential	106 units	525 gpd/du ¹	55,650
School	85 edu	525 gpd/edu ²	44,928
Landscaped Park	3.0 net acres	4,000 gal/ac	12,800
Institutional Uses	11.4 net acres	5,000 gal/ac	57,100
Total			462,903

¹ Residential based on 3.5 people per dwelling unit and 150 gallons per capita per day.

² School based on 85 equivalent dwelling units and 3.5 people per unit.

Source: Robert Bein, William Frost & Associates, October 2000.

Significance of Impacts - Water

Although the Montecito and Sycamore Estates sub-projects would contribute to an incremental burden on domestic water services, with construction of proposed on- and off-site improvements to the water supply infrastructure, adequate service would be available to the project site; thus, impacts are not regarded as significant.

Mitigation Measures, Monitoring and Reporting Program - Water

Impacts to water service would not be significant; therefore, mitigation is not required.

SEWER

Significance Criteria - Sewer

Impacts would be regarded as significant if the proposed project could not be supplied with adequate sewer service by existing and proposed facilities.

Impact Analysis - Sewer

Wastewater transportation, treatment and disposal would be provided by the Metropolitan Sewer System (METRO) which is owned by the City of San Diego. Sewage also would flow through the City of Poway under the terms of the approved agreement between the City of San Diego and the City of Poway known as the "Pomerado Relief Trunk Sewer Agreement of 1980 between the City of San Diego and the Pomerado County Water District." Scripps Miramar Ranch sewer located in Pomerado Road would connect the *Rancho Encantada* project site to the METRO sewer system. The proposed Montecito project design precludes gravity flow into the Scripps Miramar Ranch sewer until some distance north of the intersection of Pomerado Road and Scripps Poway Parkway. Pomerado Road, built in 1989, was constructed relatively high in elevation above Beeler Canyon and the existing sewer in Creek Road. The 1989 amendment to the City of San Diego/City of Poway agreement mentioned above recognized this fact and anticipated that a sewer pump station may be required to serve development in Beeler Canyon, including the project site.

Table 4.11-5, *Estimated Wastewater Generation for the Montecito Sub-Project*, presents a summary of the projected wastewater generation for the Montecito sub-project. An analysis by NOLTE AND ASSOCIATES (see Appendix J1 of this EIR) states that the 278 single family lots proposed on the Montecito sub-project would generate 77,840 gallons per day, or approximately 28.3 million gallons annually, of sewage flow.

TABLE 4.11-5
ESTIMATED WASTEWATER GENERATION FOR THE MONTECITO SUB-PROJECT

LAND USE	MAX # OF UNITS	GENERATION FACTOR	GALLONS PER DAY
SF Residential	278	280 gpd/du	77,840

1 Residential based on 3.5 people per dwelling unit and 80 gallons per capita per day.
Source: Nolte; January 2000.

Table 4.11-6, *Estimated Wastewater Generation for the Sycamore Estates Sub-Project*, presents a summary of the projected wastewater generation for the Sycamore Estates portion of the project. An analysis by RBF (see Appendix J2 of this EIR) states that the 557 single family lots, 106 multi-family units, a 19.7 gross-acre school/park site and 11.4 acres of institutional uses proposed on the Sycamore Estates sub-project would generate 245,220 gallons per day, or approximately 89 million gallons annually, of sewage flow.

As part of NOLTE's study and RBF's study, a capacity analysis was conducted for the Scripps Miramar Ranch sewer. Flows from existing properties plus the proposed Montecito and Sycamore Estates sub-projects were estimated, with the conclusion that the existing sewer can accommodate the anticipated project flows without remediation.

Within the Precise Plan area, most on-site sewer lines would be located in local residential streets, as shown on Figure 3-5, *Precise Plan Conceptual Sewer Plan*, in Section 3.0, PROJECT DESCRIPTION. The collection of on-site sewers would largely be achieved by an additional gravity sewer main proposed in Beeler Canyon Road, in the City of San Diego. At the westerly end of Beeler Canyon Road, two design options exist for the conveyance of wastewater: a lift station option and a gravity sewer option. Under the lift station option, wastewater would be pumped by a proposed sewer lift station located on the Montecito sub-project site up to Pomerado Road. Construction of the lift station would be the responsibility of the Sycamore Estates sub-project owner/permittee. The existing 8-inch sewer main in Pomerado Road would need to be extended southward approximately 1,200 feet to intercept the lifted flow. It is also likely that the existing 8-inch main would need to be upsized to handle the increased flow from the Precise Plan area. Sewage generated by the Rancho Encantada Precise Plan areas would flow through the existing and proposed lines to lift stations, and would eventually reach the Point Loma Sewage Treatment Plant. Because the existing sewer infrastructure and proposed improvements under the lift station option would adequately accommodate the transport of wastewater, significant impacts would not occur.

As a design option of the Sycamore Estates project, an off-site gravity sewer system is proposed. Under this scenario, the on-site sewer lift station would not occur and off-site improvements would be necessary starting at the intersection of Beeler Canyon Road and Creek Road. A detailed description of the off-site improvements required under this design option are provided in Section 3.2.8. The entire length of the off-site gravity sewer alternative would be approximately 9,880 feet from the start at Beeler Canyon Road to the final connection with the existing Poway sewer system at Oak Knoll

Road. Because the existing sewer infrastructure and proposed gravity sewer improvements would adequately accommodate the transport of wastewater, significant impacts would not occur.

**TABLE 4.11-6
ESTIMATED WASTEWATER GENERATION FOR THE SYCAMORE ESTATES SUB-PROJECT**

LAND USE	MAX # OF UNITS	GENERATION FACTOR	GALLONS PER DAY
SF Residential ¹	557	280 gpd/du	155,960
SF Residential ¹	106	280 gpd/du	29,680
School ²	107 edu	280 gpd/edu	29,960
Park ³	4 edu	280 gpd/edu	1,120
Institutional	11.4 net acres	2,500 gpd/ac	28,500
Total			245,220

1 Residential based on 3.5 people per dwelling unit and 80 gallons per capita per day.

2 School based on 107 equivalent dwelling units and 3.5 people per unit.

3. Park based on 4 equivalent dwelling units.

Source: Robert Bein, William Frost & Associates; June 2000.

Significance of Impacts - Sewer

Although the Montecito and Sycamore Estates sub-projects would contribute to an incremental burden on sewer services, with construction of proposed on- and off-site improvements to the sewer system infrastructure, adequate service would be available to the project site; thus, impacts are not regarded as significant.

Mitigation Measures, Monitoring and Reporting Program - Sewer

Impacts to sewer services would not be significant; therefore, mitigation is not required.

Issue 4: *Is adequate solid waste disposal available to serve the proposed project?*

Significance Criteria - Solid Waste

A significant impact on solid waste disposal would occur if the landfill servicing the project site does not have sufficient permitted capacity to accommodate the project's solid waste disposal needs.

Impact Analysis - Solid Waste

The City of San Diego Environmental Services Department (ESD) considers a 30-unit or greater residential development that generates approximately 60 tons of waste per year as a significant impact on landfill capacity. Besides wastes generated from operational activities, construction activities also generate wastes. The ESD considers construction of 30 or more residential units a "large" project, which may have a direct impact on landfill capacity. The *Rancho Encantada* project proposes 941 residential dwelling units, with 278 units on the Montecito sub-project site and 663 units on the Sycamore Estates sub-project site. Thus, both sub-projects would be considered "large" by ESD standards.

Projected waste streams from both the construction and operation of the proposed *Rancho Encantada* project were calculated to determine the potential impacts on landfill capacity and ESD services. There are no established waste generation rates published or utilized by the ESD or the California Integrated Waste Management District (CIWMD) to calculate the amount of wastes that would be generated from project construction. Thus, there is no method to determine the quantity of wastes that should be recycled and reused during construction-related activities. In absence of that specific information, the ESD may require the project proponent to provide the following prior to issuing building permits: 1) a waste management plan; 2) the identification of businesses that would accept products made with post-consumer materials; 3) set-aside areas on construction sites for collection and separation of reusable and/or recyclable materials; and 4) demonstration of a good faith effort to purchase recycled materials. That plan would include specific plans to reduce and recycle wastes by 50 percent and would be written with partial input from the contractor(s) to ensure its effectiveness.

The ESD estimates the average amount of solid waste that is generated by residential development to be 2.0 tons/year per unit for single family residential uses and 1.2 tons/year for multi-family residential uses. Buildout of the Montecito sub-project with 278 single-family homes, and buildout of the Sycamore Estates sub-project with 557 single-family homes, 106 multi-family units, a school/park site and two institutional sites would generate approximately 2,225 tons of waste per year, as summarized by 4.11-7, *Projected Solid Waste Generation*. The density to which trash can be compacted at the landfill is between 400 to 1,500 pounds per cubic yard (ppcy). A minimum acceptable figure is 800 ppcy, with 1,000 ppcy being a typical estimate (Lindberg, 1986 Civil Engineering Reference Manual). If 1,000 ppcy is used to estimate the compacting of 2,225 tons of solid waste per year, the resulting volume of generated solid waste would be about 4,450 cubic yards per year, or 12.1 cubic yards per day. The remaining landfill capacity of the Miramar Landfill as of January 1999, is approximately 28,300,000 cubic yards. Therefore, the Project's solid waste generation per year would occupy 0.01 percent of the total remaining landfill capacity. Accordingly, the Project's small incremental impact on the Miramar Landfill would not be regarded as significant.

The proposed Montecito and Sycamore Estates sub-projects would, however, result in the net production of solid waste and contribute to the cumulative impacts on the ESD's landfill capacity and waste management services (see Section 5.0, CUMULATIVE EFFECTS). This cumulative contribution would be regarded as a significant cumulative impact of both sub-projects and the proposed *Rancho Encantada* Precise Plan as a whole. The sub-projects would be subject to Municipal Code Section

101.2001, which requires participation in the City's recycling program. The City of San Diego's recycling program is consistent with the California Integrated Waste Management Act (1989), which requires a 50 percent reduction by December 2000. The residential uses would be required to incorporate those recycling and waste reduction measures provided in the City's Source Reduction and Recycling Element.

**Table 4.11-7
ESTIMATED SOLID WASTE GENERATION**

LAND USE	DEVELOPMENT UNIT	SOLID WASTE GENERATION RATE (TONS PER YEAR)	AVG. SOLID WASTE GENERATION PER YEAR	AVG. SOLID WASTE GENERATION PER DAY
MONTECITO SUB-PROJECT				
Single Family Res.	278 units	2.0	556 tons	1.52 tons
SYCAMORE ESTATES SUB-PROJECT				
Single Family Res.	557 units	2.0	1,114 tons	3.04 tons
Multi Family	106 units	1.2	127 tons	0.35 ton
School Site	10.0 net acres ¹	.054/student, employee	378 tons	1.03 tons
Park Site	3.0 net acres	<i>nominal</i>	<i>nominal</i>	<i>nominal</i>
Institutional	11.4 net acres ²	1.68/employee	50.4 tons	0.13 ton
Sycamore Estates Sub-Project Subtotal			1,669 tons	4.55 tons
Precise Plan Total			2,225 tons	6.07 tons

1 Based on 700 students/employees.

2 Based on 30 employees.

Significance of Impacts - Solid Waste

Incremental impacts to landfill capacity are not considered significant on a project-specific level. Cumulative impacts on landfill capacity and waste management services would be regarded as significant (see Section 5.0, CUMULATIVE EFFECTS).

Mitigation Measures, Monitoring and Reporting Program - Solid Waste

The following measures shall apply to both the Montecito and Sycamore Estates sub-projects:

4.11-5: Destination of Materials:

- a. The owner/permittee and construction contractors of each sub-project shall contact and use businesses (including self) that accept post-consumer materials for manufacture.

(A list of construction and demolition recyclers and materials accepted by these facilities is available from the City of San Diego Environmental Services Department.)

- b. Construction contractors shall identify the method of transporting materials to either a landfill or reprocessing centers.

4.11-6: Buy Recycled:

- a. The owner/permittee of each sub-project shall identify products to be used in the construction activities that may be made of post-consumer content.
- b. A good-faith effort shall be made to identify and use readily available products made with post consumer materials. Recycled products shall be comprised of at least 50 percent recycled materials.

4.11-7: Education:

- a. The owner/permittee of each sub-project shall provide a plan to educate and inform contractors of the waste management plan's goals of waste reduction and procedures for implementing them. Where possible, goals shall be included in contractor specifications. The sub-project's owner/ permittee shall ensure that contractors achieve the performance levels specified.

4.12 PUBLIC SAFETY

4.12.1 EXISTING CONDITIONS

□ Electromagnetic Fields

The San Diego Gas & Electric Company (SDG&E) maintains a 200-foot wide electrical transmission line easement on the project site. This easement comprises approximately 44.4 acres of the Precise Plan area, including 33.3 acres on the Montecito sub-project site and 11.1 acres on the Sycamore Estates sub-project site. The easement accommodates one circuit of 138 kV and one circuit of 230 kV overhead transmission lines and four steel lattice towers. The towers are located in the Montecito sub-project area with two located in the north-central portion and two located in the eastern portion. There is a minimum vertical ground clearance for all wires of 45 feet at any given point. Various other smaller easements cross the Sycamore Estates sub-project site, including two parallel 12-foot and 25-foot wide easements running in a north/south alignment through the western portion of Sycamore Estates that connects to an SDG&E substation located south of the Project site on the MCAS Miramar property.

There has recently been concern about electromagnetic fields (EMF) and the relationship to increased incidence of rare forms of cancer. Studies from the late 1970s have suggested a possible relationship between cancer, specifically childhood leukemia, and exposure to electric and magnetic fields or proximity to overhead transmission lines. The available scientific data do not support a conclusion that electric and/or magnetic fields cause health effects. However, due to increasing concern regarding electromagnetic (EMF) fields and health effects and the proximity of the power lines to potential development areas, this issue is addressed in this EIR. CEQA Guidelines Section 15145 states, “[i]f, after thorough investigation, a Lead Agency finds that a particular impact is too speculative for evaluation, the agency should note its conclusion and terminate discussion of the impact.” The following discussion summarizes information gathered to date on EMF effects and their possible ramifications.

High-power transmission lines (such as those located within the SDG&E easement) generate electromagnetic fields, which consist of invisible lines of force that surround anything conducting electricity. An electrical field is created when voltage is established on a wire (i.e., when an item is “plugged in”), while magnetic fields are created with the flow of current (i.e., if there is no current, there is no electrically induced magnetic field). These created electric and magnetic fields are widespread in modern America and are generated by all electrical items, including many common household appliances. A small sample of common EMF sources includes refrigerators, televisions, stereos, coffee makers, broilers, electric blankets, fax machines, computers, and light bulbs. Electromagnetic fields are created by charged particles. The electric component of the field pushes or pulls charged particles, such as ions, in the direction of the field. The magnetic component acts on moving charged particles and pushes them perpendicular to their direction of motion.

Commonly, distributed electric power is alternating current. This is in contrast to the direct current produced by batteries. An alternating current does not flow steadily in one direction, but alternates

back and forth. The power used in North America alternates at 60 cycles per second (the current changes direction 120 times per second), which is known as 60 hertz (Hz). Consequently, the electric and magnetic fields produced by the electric power also oscillate at 60 Hz. Europe and some other parts of the world use a 50 Hz frequency.

The electromagnetic fields produced by 60 Hz power lines have a much lower frequency and, therefore, lower energy than microwaves or X-rays, although they are all forms of electromagnetic energy. For comparison, radio waves operate at approximately 10^6 Hz (1,000,000 cycles per second); a television screen operates at approximately 10^8 Hz; visible light occurs slightly below 10^{15} Hz; ultraviolet light ranges from about 10^{15} to 10^{17} Hz; and X-rays range from 10^{16} to 10^{20} Hz. The spectrum of electromagnetic wavelengths is shown in Figure 4.12-1, *Approximate Spectrum of Electromagnetic Fields*.

Because X-rays have enough kinetic energy to break apart the molecules that contain genes, excessive X-ray exposure can lead to mutations and cancer. When microwave energy passes through materials containing water, the energy is absorbed by the materials and converted to heat. This is how a microwave oven works. The electromagnetic fields produced by 60 Hz transmission lines do not have enough energy to break apart molecules, and although they can cause heating in substances, this heat is barely detectable. Normally occurring temperature changes (i.e., temperature changes due to normal biological processes) in human cells are greater than the temperature changes that these electromagnetic fields can produce (Culver Company 1994). Therefore, electromagnetic fields from 60 Hz power transmission lines do not have the same effects on the human body as microwaves or X-rays.

Electric fields are measured in volts per meter (V/m) and magnetic fields are measured in teslas or gauss, which equals one ten-thousandth of a tesla. Typical electric field levels within the home or workplace are 1 to 10 V/m; fields within one foot of small appliances reach 20 to 200 V/m; and the field strength directly next to an electric blanket can reach 10,000 V/m. Ten thousand volts per meter is approximately the maximum level directly beneath a 765 kilovolt (kV) transmission line. Electric fields weaken rapidly with increased distance from the source. An electric field with a 10,000 V/m strength at the source will decrease to less than 500 V/m at a distance of 60 meters. Electric fields are also easily blocked by vegetation and buildings. Table 4.12-1, *Typical Values of Created Power Frequency Electric Fields*, shows some common electric field values. Figure 4.12-2, *Lateral Profiles of Electric Field Intensities of Typical Power Lines*, shows a lateral profile of an electric field at ground level for typical transmission lines. These profiles assume a flat ground with no intervening obstacles, such as vegetation or walls. The highest-voltage line in the easements in or near the project site is 230 kV.

The maximum magnetic field value beneath a power distribution line is approximately 50 milligauss (mG), and that directly beneath a 765 kV transmission line is approximately 250 mG. The level directly below a 220 kV line is about 65 mG, which decreases to about 15 mG at a distance of 30 meters. Typical home levels are between 0.1 and 50 mG and the values within several inches of appliances can be 10 to 20 times higher. Unlike electric fields, magnetic fields are not substantially affected by vegetation and buildings. Figure 4.12-3, *Lateral Profiles of Magnetic Flux of Typical Power Lines*, shows a lateral profile of a magnetic field at ground level for typical transmission lines.

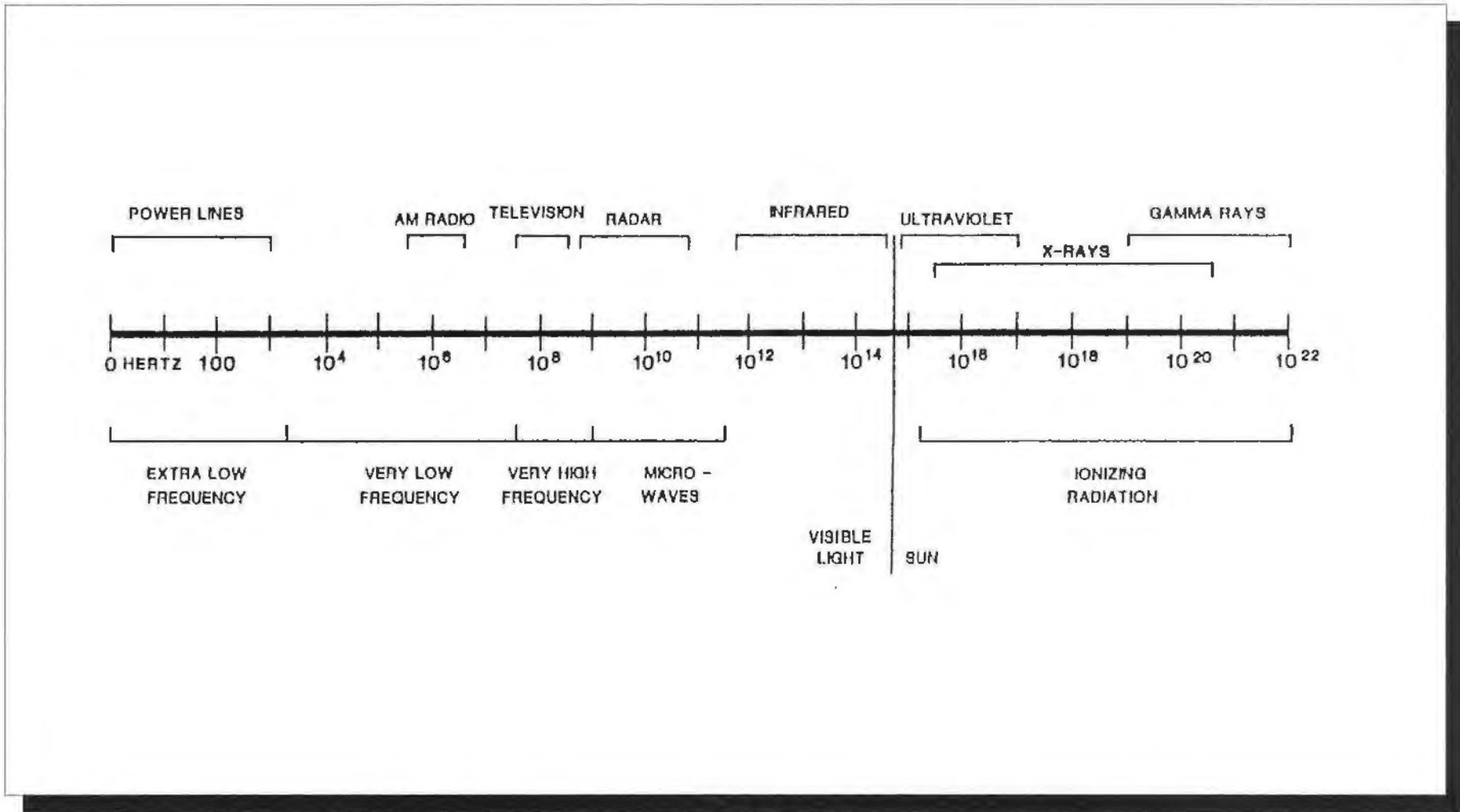


Figure 4.12-1
 APPROXIMATE SPECTRUM
 OF ELECTROMAGNETIC FIELDS

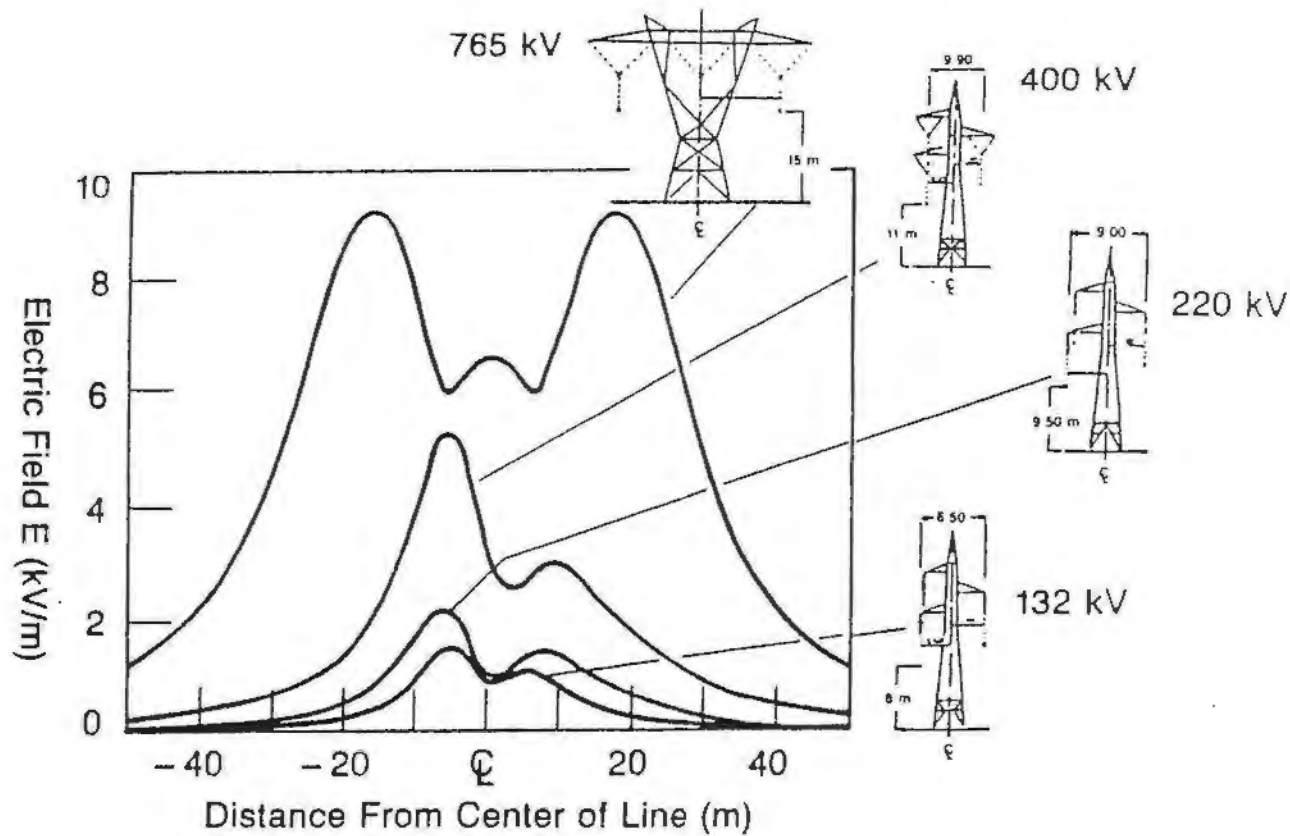


Figure 4.12-2
**LATERAL PROFILES OF ELECTRIC FIELD
 INTENSITIES OF TYPICAL POWER LINES**

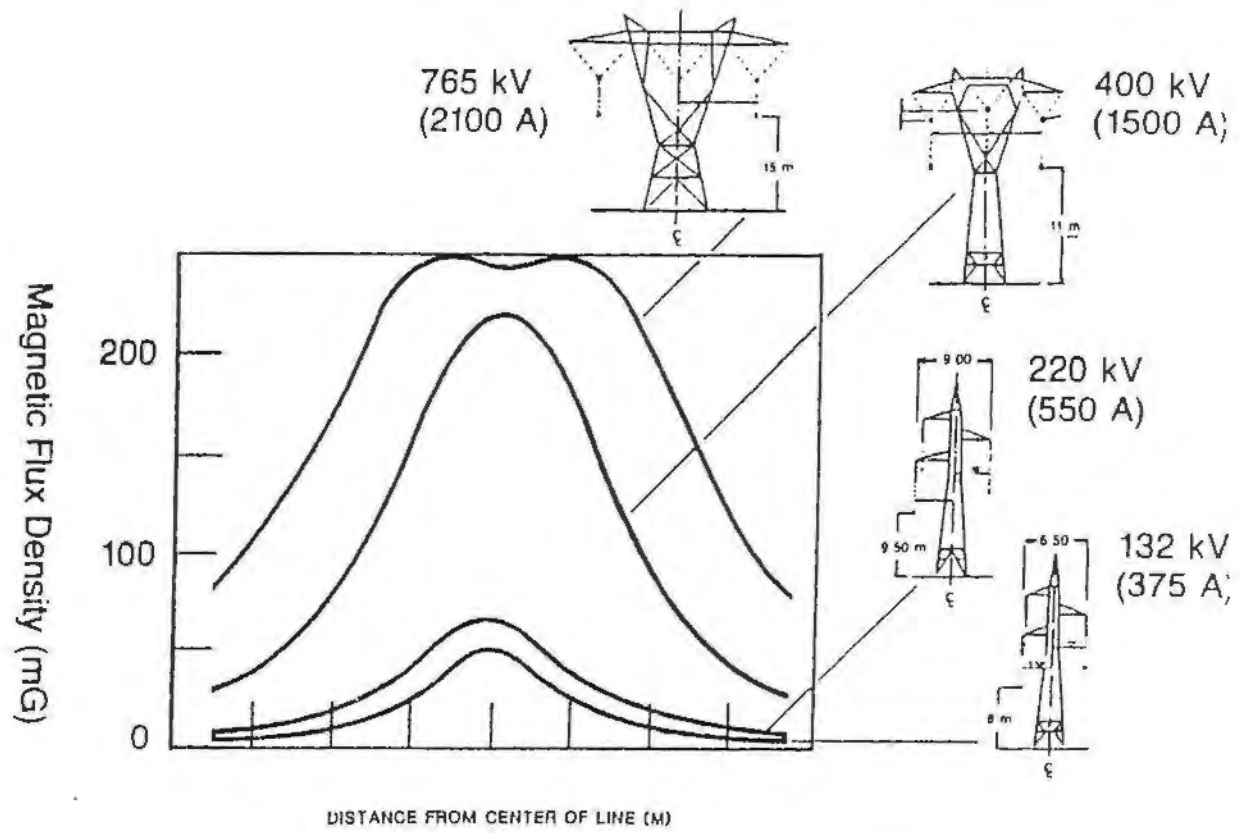


Figure 4.12-3
LATERAL PROFILES OF MAGNETIC FLUX OF TYPICAL POWER LINES

Table 4.12-2, *Magnetic Fields Measured at 11.8 Inches from Various Household Appliances*, shows some common magnetic field values.

Reports from the Soviet Union of various health complaints among utility workers in high-voltage switchyards in the early 1970s generated worldwide concern regarding the possibility of adverse health effects from exposures to electric fields. Subsequent research on electrical utility workers in Europe and North America failed to confirm the presence of such complaints, and subsequently, Soviet investigators indicated that their earlier concerns had been “overstated” (Bailey Research Associates, Inc. 1992).

TABLE 4.12-1
TYPICAL VALUES OF CREATED POWER FREQUENCY
ELECTRIC FIELDS

SOURCE	ELECTRIC FIELD (V/M) AT 11.8 INCHES FROM SOURCE
Electric Cooking	4
Toaster	40
Electric blanket	250
Iron	60
Broiler	130
Hair dryer	40
Vaporizer	40
Refrigerator	60
Color TV	30
Stereo sound equipment	90
Coffee pot	30
Vacuum cleaner	16
Hand mixer	50
Incandescent light bulb	2

SOURCE: International Electricity Research Exchange 1988.

TABLE 4.12-2
MAGNETIC FIELDS MEASURED AT 11.8 INCHES
FROM VARIOUS HOUSEHOLD APPLIANCES

APPLIANCES	RANGE OF MEASURED FIELDS (MG)		
Ranges	3	-	50
Ovens	1	-	50
Microwaves	40	-	90
Disposals	8	-	12
Dishwashers	7	-	14
Refrigerators	<0.1	-	3
Washers	2	-	20
Dryers	0.7	-	3
Coffee makers	0.7	-	1.5
Irons	1	-	4
Can openers	30	-	300
Mixers	6	-	150
Blenders	5	-	25
Vacuum cleaners	20	-	200
Portable heaters	1.5	-	40
Fans	0.2	-	40
Hair dryers	<1	-	100
Shavers	1	-	100
Televisions	0.3	-	20
Fluorescent fixtures	20	-	40
Desk lamps	5	-	20
Saws	10	-	300
Drills	25	-	40

SOURCE: International Electricity Research Exchange 1988.

In the late 1970s and throughout the 1980s, interest shifted primarily to magnetic fields because of a reported association between the apparent current-carrying capacity of power lines and childhood cancer (Wertheimer and Leeper 1979) and because electric fields from outside sources cannot penetrate building materials and enter homes. The apparent association to date arises from epidemiological studies, which are based on a statistical association between a pattern of disease (such as cancer) and a factor (such as overhead power lines). This is in contrast to laboratory studies, which develop a cause-and-effect relationship from experimental evidence and are reproducible. Over 20 epidemiological studies have been conducted on this subject with conflicting results, but much of the debate is based on two studies in the Denver area. The first was published in 1979 by Nancy Wertheimer and Ed Leeper. It compared the home environments of childhood cancer victims and a control population to attempt to identify whether any factor related to home environment was statistically associated with the occurrence of cancer. Overhead power lines were identified as a possible factor.

Power delivery systems have high-tension wires which operate at high voltages (up to several hundred kilovolts) to allow power to be transported at relatively low currents. These wires deliver power to distribution substations where the voltage is stepped down, resulting in proportionately higher current in the medium-voltage primary lines. These lines carry power to a local transformer, where the voltage is stepped down again to produce the 240 volts delivered to individual residences. The current flow is greatest in the wires directly issuing from a substation or local transformer. At these points the voltage has been stepped down and “transformed” into current (Wertheimer and Leeper 1979). It was homes particularly close to these transforming points that were over-represented among cancer cases in the Wertheimer and Leeper study.

The magnetic fields produced by the currents in the power distribution lines can be canceled by balancing the supply and return currents (the magnetic field is zero between two lines with currents that are equal in magnitude but opposite in direction). This cancellation is not complete because the wires are often separated in space and because some of the return current does not flow through the wires. Some of the return current may instead go through the ground or, in many cases, through the plumbing system to which most urban electrical systems are grounded at each house. This results in a locally imbalanced current, both in the distribution wires and in the plumbing.

The Wertheimer and Leeper study states that the ground current flows not only in the street plumbing but also through the pipes in the house. Current which enters the plumbing at one house can flow through several homes before it returns to the distribution wires because the plumbing provides a continuous low-resistance path between houses. The ground current produces a magnetic field which Wertheimer and Leeper state “appears to be roughly related to the types of wiring configurations nearby. This relationship between wires and plumbing is to be expected because, other things being equal, the greatest unbalanced current tends to occur where the total current in the wires is greatest, and the unbalanced portion of the current must detour through ground paths, such as the nearby earth and plumbing.”

The Wertheimer and Leeper researchers classified the houses in the study based on the proximity to high-current configuration (HCC) and low-current configuration (LCC) wires. The HCC category was further divided into three subcategories: (1) home less than 40 meters from large-gauge primaries or an

array of six or more thin primaries; (2) homes less than 20 meters from an array of three to five thin primaries or from high-tension (50-230 kV) wires; and (3) homes less than 15 meters from first span secondary (240-volt) wires. First span secondaries were redefined as those secondaries which issued directly from the transformer and had not yet lost any current through a service drop occurring beyond the transformer pole.

However, no attempt was made to measure the actual magnetic field levels present. In other words, children with cancer were reported to be more likely to have power-line wiring outside the home apparently capable of generating higher magnetic fields than were healthy children, although actual exposures were not determined. Additionally, the studies by Wertheimer and Leeper were criticized for not eliminating confounding factors, such as maternal smoking, use of X rays, air pollution, traffic, noise, exposure to hazardous chemicals, and housing density, which might have contributed to the cancer but are unrelated to power-line fields. The classification of the wires was also considered biased because the researchers knew whether the case person of the house had contracted cancer or not. The classification itself was considered arbitrary based on visual inspection.

A second study in Denver was completed which expanded on Wertheimer and Leeper's work and improved some of the weaknesses in the previous methodology (Savitz et al. 1988). A modest statistical correlation between children with cancer and the proximity of their homes to HCC power lines was found. But the correlation between cancer and the actual measured magnetic fields in the homes was weak enough to be included in a statistical margin of error.

Another study that made field measurements of magnetic fields in the homes to estimate exposure (rather than using the crude estimations based on the type of utility wiring outside the home and the distance of the lines from the home) did not report a statistically significant association between childhood cancer and measured fields (London et al. 1991). Several other epidemiological studies conducted in community settings have not detected any association between proximity to power-line sources of magnetic fields and cancer. (Fulton et al. 1980; McDowall 196; Coleman et al. 1989; Myers et al. 1990).

Results of occupational epidemiological studies are also contradictory. Some of these studies indicate a statistical association between some types of cancer and electrical occupations while others do not (California Department of Health Services 1992; Bailey Research Associates 1992). As with the residential studies, the major limitation of the studies completed to date is the lack of data regarding actual exposure, since they use job classification/job titles to estimate exposure (Office of Technology Assessment 1989).

Most recently, a study was completed involving cancer mortality among workers at Southern California Edison Company. No consistent association was found between either work in electrical occupations or magnetic fields measured in the work environment and all cancers combined. A similar study completed in 1992 among Swedish electric utility workers provided results consistent with the Southern California Edison study (Sahl, Kelsh, and Greenland 1993).

There are still relatively little data that give experimental support for a mechanism of cancer development from magnetic fields, but there is growing recognition that these fields may have biological effects based on the fact that every cell in the body has charged particles of various kinds on the two sides of the outer membrane. Thus, cell membranes are much like miniature storage batteries, maintaining a separation of charge across themselves. It is speculated that 60 Hz fields may alter the behavior of charged particles located in or attached to cell membranes. Most investigators agree that the findings are suggestive enough to deserve further inquiry. However, the following conclusion has been reached with regard to the laboratory evidence regarding the association between magnetic fields and cancer.

Extensive laboratory studies of human and animal cells exposed *in vitro* to 60 Hz electromagnetic fields (EMFs) over a wide range of intensities show no indication of damage to DNA, the capacity to repair DNA damage, micronuclei formation or increased chromosomal aberrations. Therefore, the consensus among members of the scientific community is that 60 Hz EMFs are not cancer initiators (Bailey Research Associates 1992).

The epidemiological and laboratory studies conducted to date, as a whole, do not support the conclusion that exposure to magnetic fields is a cause of cancer (California Department of Health Services 1992; Bailey Research Associates 1992; U.S. Environmental Protection Agency 1992). At present, the scientific community does not support the implementation of standards since science has not identified exposure to EMFs as a health hazard nor has it provided any meaningful dose-response data on which to base standards (California Department of Health Services 1992; Bailey Research Associates 1992).

A study conducted in Finland in 1996 concluded that magnetic fields created by high-voltage power lines are unlikely to significantly increase the risk of cancer (Press-Enterprise, 1996). In that nationwide study of 383,700 people, almost no difference in the incidence of cancer was found among adults living within 500 yards of overhead power lines when compared to the population as a whole. The researchers said the results, published in the British Medical Journal, suggest strongly that typical magnetic fields generated by high-voltage power lines in residential areas are not related to cancer in adults.

At the local level, the California Public Utilities Commission (CPUC), after investigating the EMF issue, found that available scientific research does not support a conclusion that exposure to low-frequency fields is a health risk. However, the CPUC, SDG&E, and other utilities in California recognize that some public concern and scientific uncertainty exist regarding a potential health risk associated with EMF. As a result, the CPUC issued Decision 93-11-013 on November 2, 1993. In this order, the commission directed California's utilities to standardize guidelines with other utilities where possible.

At the national level, the National Research Council committee released a congressionally-requested report titled "Possible Health Effects of Exposure to Residential Electric and Magnetic Fields" in 1996. The Research Council committee examined 500 studies spanning 17 years of research and concluded that no clear, convincing evidence exists to show that residential exposures to electric and magnetic

fields are a threat to human health. The report also states that results of studies aggregate regarding links between leukemia and EMF have been inconsistent and contradictory and do not constitute reliable evidence of an association (National Research Council Commission on Life Sciences, 1996).

The bottom line is that there is no established cause and effect relationship between EMF exposure and cancer or other disease. For this reason, the Environmental Protection Agency cannot define a hazardous level of EMF exposure (EPA 1992).

Because the possible link between electromagnetic fields from power lines and deleterious health effects has not been established, no land use setback distances from power lines or easements has been recommended except for the California State Department of Education, which requires a 150-foot setback from 230 kV transmission lines for adjacent school sites.

□ Hazardous Materials

An environmental assessment, entitled *Phase I Environmental Site Assessment: Beeler Canyon Property, San Diego, California* was conducted by GEOCON in September 1998 for the Montecito sub-project site and is included as Appendix K1 to this EIR. An environmental site assessment was conducted for the Sycamore Estates sub-project site by P&D ENVIRONMENTAL SERVICES, entitled *Phase I Environmental Site Assessment General Dynamics Sycamore Canyon Site* and is included as Appendix K2 to this EIR. These assessments were conducted to observe if any facilities or structures located on the properties are operated by entities that potentially use, store, generate or dispose of hazardous materials and/or wastes. The following is a description of what was found on the two sites.

Regulatory Setting

The management of hazardous chemicals is regulated by the Occupational Safety and Health Act (OSHA), the Hazardous Materials Transportation Act of 1975, the National Fire Code, Flammable and Combustible Liquids Code, California Code of Regulations Title 22, and the Hazardous Materials Management Division of the County of San Diego. Hazard identification and threshold planning is regulated by the Emergency Planning and Community Right to Know Act of 1986 (California Code of Regulations Title 19). Worker safety regulations are contained in Title 8 of the California Code of Regulations. Any storage of hazardous materials, such as waste hydraulic fluids, vacuum oils, paint wastes, adhesive wastes, kerosene, and gasoline would require the user to obtain a permit from the County and a hazardous waste generator identification number from the California Department of Toxic Substances Control.

Montecito Sub-Project Site

An empty 55-gallon drum and an above-ground storage tank were found on the northwest portion of the Montecito sub-project site. Labels were not observed on the drum or the tank and staining of the surrounding ground surfaces was not observed. A wooden shed on top of an apparent concrete foundation was also observed on the northwestern portion of the subject property. An above-ground electrical line connects the shed to the power poles. The inside of

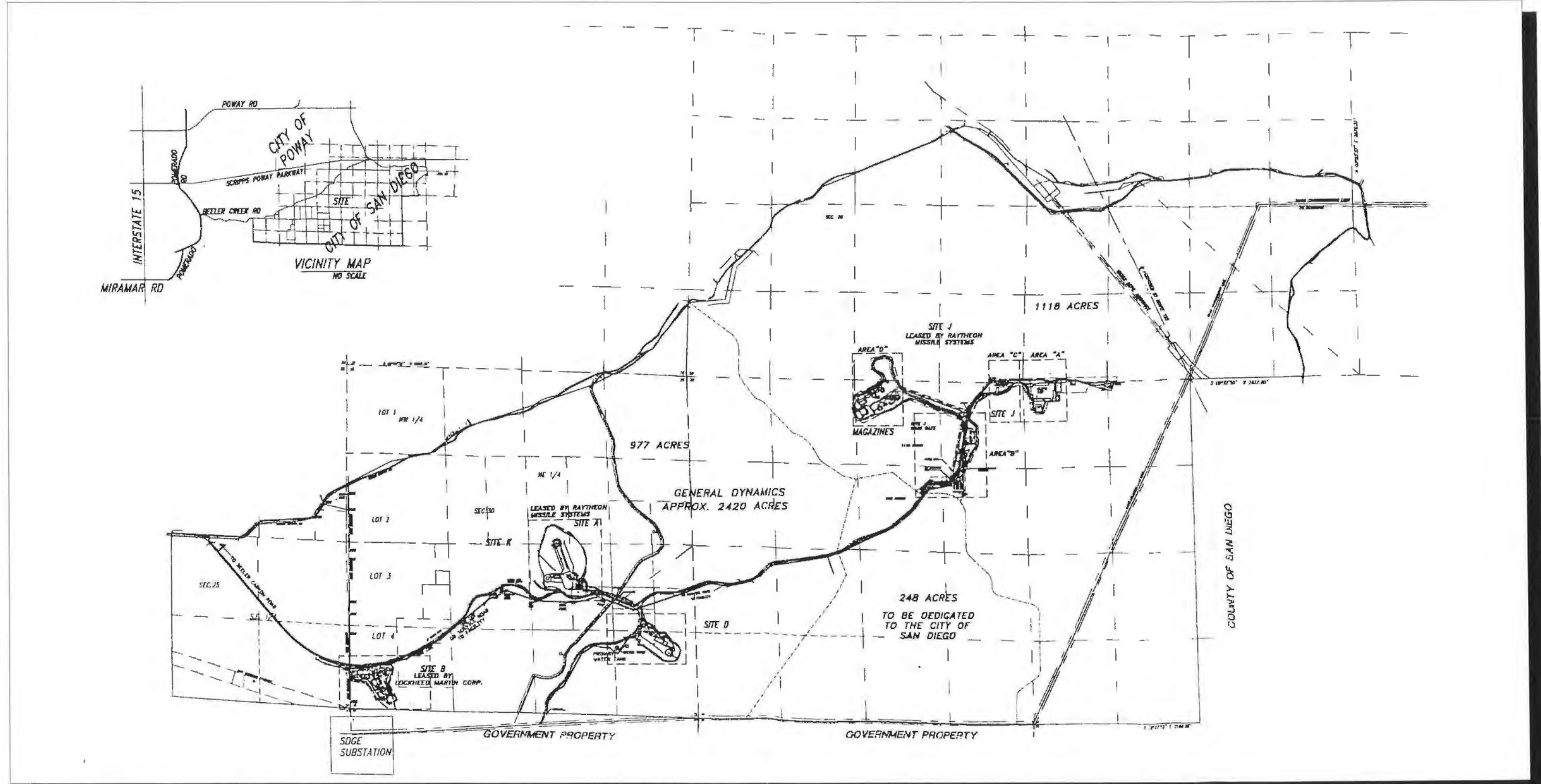
the shed was not observed. The San Diego Water Utilities Department indicated that there are no drinking water wells in the site area and that there have not been drinking water contamination problems reported in the vicinity.

Sycamore Estates Sub-Project Site

The Phase I site assessment conducted by P&D ENVIRONMENTAL indicated that the Sycamore sub-project site contains five operational sites (labeled as Sites A, B, D, J and K on Figure 4.12-4, *Existing Use Areas - Sycamore Estates Sub-Project*). Sites A, B, D and J primarily consist of assembly, testing, and storage facilities. Site A is currently under lease to Raytheon and Site B is currently leased to Lockheed Martin. Sites D, J and K are occupied by the property owner, General Dynamics. Provided below is a brief description of the existing condition of each site. According to the Phase 1 Site Assessments, no significant site contamination was found on the sub-project site and no contamination beyond that which was reported in the federal and local lists was discovered during field reconnaissance. In addition, review of the regulatory agency information and area reconnaissance did not indicate off-site hazardous material sources of environmental concern to the project site.

Site A: Site A is occupied by Raytheon and is used as a radar test site. Site A was once occupied by General Dynamics' Convair Division, who also used the site as a radar cross section testing range. Small containers of gasoline cutting oils, paint resins and propane cylinders exist at this location, and no containers were observed to be leaking. Due to the small amount of hazardous materials at Site A, this site is not considered a significant source of hazardous materials.

Site B: Site B was once occupied by General Dynamics' Space Systems Division and was used to preform temperature testing on rocket bodies with liquid hydrogen and liquid nitrogen. A leach field was observed at this location which has not been tested. Site B is now occupied by Lockheed-Martin as a radar cross-section (RCS) range and cryogenic and structural test facility for missiles. Small quantities of hazardous wastes are reportedly generated by Lockheed-Martin, including hydraulic fluids and vacuum oils, paint wastes, and adhesive wastes and small amounts of kerosene and gasoline. The waste materials are stored in 0.25- to 5-gallon drums and on pallets in a concrete lined, bermed hazardous materials storage area and in a hazardous waste storage locker located on the western side of Site B. In addition, large volumes of liquid nitrogen and oxygen are used at Site B during cryogenic testing. According to the lessee, these hazardous materials are removed by Greenfield Environmental every month. Site B appears on the County of San Diego HE17 Database. The current user of the site, is listed as having a hazardous materials inventory, including gases, gasoline, kerosene, alcohol, oils and Stoddard solvent (up to 15 gallons annually). County of San Diego Department of Environmental Health records identified a small spill of mercury (less than two ounces) within Building 21 at Site B. However, no indications of residual mercury contamination at this location were noted in the County file.



SOURCE: P & D ENVIRONMENTAL SERVICES

Figure 4.12-4
**EXISTING USE AREAS-
 SYCAMORE ESTATES SUB-PROJECTS**



Site D: Site D was occupied by General Dynamics' Space System Division and was used to test the structural load of rocket bodies. Two 55-gallon drums, one for Freon and one for Gensolve, were observed on the site. Site D is now unoccupied and used informally by the property owner for car repair and boat storage. A 500-gallon diesel tank was previously located on Site D, but was removed on December 11, 1998 in accordance with procedures required by the County of San Diego Health Department's Site Assessment and Mitigation Manual.

Site J: Site J was occupied jointly by General Dynamics' Convair and Air Defense Systems Division to assembly, testing, and storage. Site J is currently being utilized by Raytheon for assembly, testing and storage. According to Law (1997) hazardous wastes generated at Site J included JP10 and paint wastes. Hazardous waste is stored in 5-gallon and 55-gallon containers and is reportedly stored outside Building 107 and in a storage area across from building 103, which have restricted access. Hazardous waste was reported to be removed from the Property by Laidlaw Environmental every two weeks. Two underground storage tanks are located at this site. A 1,000-gallon gasoline tank was previously located on Site J, but was removed on December 11, 1998 in accordance with procedures required by the County of San Diego Health Department's Site Assessment and Mitigation Manual.

Site K: Site K is currently inactive, but was once occupied by General Dynamics' Convair Division and was previously used as a functioning testing site for the Tomahawk missile. The testing involved securing the booster engines to foundations and then igniting the boosters which contained a solid propellant that included ammonium perchlorate and carboxyl-terminated polybutadiene.

Electrical Transformers: Electrical transformers are a potential source of environmental concern due to the possible presence of polychlorinated biphenyl (PCB) containing cooling oils used in some units. Several utility-owned concrete pad-mounted electrical transformers and several small, pad-mounted, privately-owned electrical transformers are located on Sites A, B, and D. None of these units were labeled as to PCB content, and none appeared to be leaking into the ground surface. It is expected that most of the smaller units were "dry-type" transformers. However, one pad-mounted electrical transformer was observed at Site B, and is suspected of containing PCB's.

Leach Fields: Currently, sewage disposal for Sites A, B, and D is through septic systems and on-site leach fields. Subsurface soils samples were collected from the five leach fields at Site J and the one field at Site A, and analyzed for volatile and semi-volatile organic compounds. None were detected in these samples taken in 1992.

Casings: Lastly, and as disclosed in Section 4.9, CULTURAL RESOURCES, the Sycamore Estates sub-project site contains a location (Cultural Resource Site CA-SDI-15159H) that consists of several hundred pieces of metal fragments. Preliminary cultural resource research indicated that this may be the site of a WWII era training airplane

crash. The site was re-visited by P&D ENVIRONMENTAL on May 22, 2000, to determine the existence of any hazardous material. Only a few scattered .50 caliber casings were observed by P&D, and only one casing that still had a projectile was observed. All casings observed were within 30 yards of the assumed crash impact point. All observed casings had been drilled, indicating that they were dummy ammunition and all were significantly crushed. In addition, and according to armory personnel at MCAS Miramar, dummy ammunition would never have been mixed with live ammunition because there would be no reason to do so, and because a mixed load would quickly foul the weapon. However, there is a remote possibility that some casings may still have functional primers on the property.

4.12.2 IMPACT ANALYSIS

Issue 1: Would the proposed project be adversely affected by emissions from overhead transmission lines located within the SDG&E easement?

Significance Criteria

Significant impacts to public safety would occur if adverse, documented public health effects resulted from exposure to electric and magnetic fields (EMF) associated with electric power lines or communication facilities.

Impact Analysis

As discussed in Section 3.0, PROJECT DESCRIPTION, the Project proposes 941 residential homes on the project site. The nearest residential lot to the existing northwest/southeast trending SDG&E easement would be five feet on the Montecito sub-project site (VTM Lot 268). With standard building setbacks at 30 feet to accommodate City brush management zone 1 requirements, the closest residential structure would be located approximately 35 feet from the edge of the easement. The nearest residential lot to the existing north/south trending SDG&E easement on the Sycamore Estates sub-project site would be approximately ten feet.

Future residents of the proposed Project could be exposed to EMF from the existing power lines located within the SDG&E easement. In accordance with CEQA Guidelines Section 15145, the known information about electromagnetic fields is summarized above under EXISTING CONDITIONS and no conclusion of significance is reached; the existing scientific data are inconclusive and potential impacts are speculative in nature.

Significance of Impacts

Future residents of the proposed Project would be exposed to EMF from power lines within existing SDG&E easements. Due to the inconclusive nature of scientific data regarding the hazards of EMF, potential impacts are speculative in nature and are not regarded as significant.

Mitigation Measures, Monitoring and Reporting Program

Because existing scientific data are inconclusive and potential impacts are speculative in nature, no mitigation is required for EMF exposure.

Issue 2: *Would development of the proposed project expose people to potential health hazards from hazardous materials?*

Significance Criteria

Hazardous materials impacts are considered potentially significant if a project's Phase I Environmental Site Assessment identifies: a) demolition of old commercial, industrial and/or residential structures that may contain asbestos and other hazardous materials; b) sites with existing or previously removed underground storage tanks; and/or c) hazardous materials associated with manufacturing, mining and research/development uses. If the project's Phase I Environmental Site Assessment recommends remediation, impacts would be regarded as potentially significant. In addition, potentially significant hazardous material impacts could occur if the project proposes a use that would transport, store, utilize or dispose of hazardous materials that would be subject to the regulations and requirements of the San Diego County Health Department, Hazardous Materials Management Division (HMMD).

Impact Analysis

Montecito Sub-Project

No hazardous materials were identified on the Montecito sub-project site. The Montecito sub-project proposes single family residential homes, and associated landscaping and infrastructure. These uses would not involve the transport, storage, utilization or disposal of hazardous materials subject to the HMMD. Therefore, impacts would not occur.

Sycamore Estates Sub-Project

Five existing industrial use areas are located on the Sycamore Estates sub-project site, the uses on which would be terminated with implementation of the Project. As part of the proposed Sycamore Estates sub-project, Sites A and D would be converted to residential use, Site B would be converted to institutional uses, and portions of Site J and the remainder of Site K would be vacated and converted to open space. Some buildings will remain as ancillary uses to open space. With conversion of Sites A and D to residential use, and site B to institutional uses, all existing hazardous materials would be removed and no impacts would occur. Removal of existing uses would be conducted in accordance with County Health Department guidelines. Reclamation at Site J is proposed to consist of three components: the removal of an underground storage tank (UST), the demolition of most of the existing buildings and sampling of soils in areas of existing septic systems, as described below.

Underground Storage Tank Removal: A 4,000-gallon diesel fuel tank is located on Site J. This UST was upgraded on December 11, 1998, to meet the applicable performance standards for USTs. This tank is currently being used by the tenant and would be removed after the tenant vacates the site. Presence of the tank is regarded as a significant impact, and mitigation is required.

Building Demolition: Six buildings are located on Site J that would be demolished upon vacation of the site by the current tenant. The presence of these buildings, containing hazardous materials, is regarded as a significant impact, and mitigation is required.

Septic System Soil Testing: Four septic systems are located on Site J. The presence of untested leach fields is regarded as a significant impact, and mitigation is required.

As stated previously, casings were observed within 30 yards of the assumed crash impact point. All observed casings found on the Sycamore Estates sub-project site had been drilled, indicating that they were dummy ammunition and all were significantly crushed. Some casings may still have functional primers, due to the casing being crushed, and the existence of this material on the property is regarded as a significant impact.

Significance of Impacts

Montecito Sub-Project

No hazardous materials impacts would occur on the Montecito sub-project site.

Sycamore Estates Sub-Project

Even though the Phase I Environmental Site Assessment indicated that the existing septic systems, diesel fuel tank and the six existing buildings located on site J are not hazardous, the mere existence of these features represents a significant hazard potential. Significant hazard potential also exists at Cultural Resource Site CA-SDI-15159H, the site of a WWII era training airplane crash, where there is a remote possibility that some casings may still have functional primers.

Mitigation Measures, Monitoring and Reporting Program

Montecito Sub-Project

No hazardous materials impacts would occur; therefore, no mitigation is required.

Sycamore Estates Sub-Project

4.12-1: Prior to the issuance of building permits for the Sycamore Estates sub-project site, the owner/permittee shall remove the existing 4,000-gallon above ground diesel fuel tank at Site J as identified in the project's Phase I Environmental Site Assessment. The tank shall be

removed in accordance with the County of San Diego Health Department’s Site Assessment and Mitigation Manual. The property owner shall perform all activities necessary to obtain closure from the County of San Diego, Department of Environmental Health, within six months of vacation by the lessee.

4.12-2: Prior to the issuance of grading permits for the Sycamore Estates sub-project site, the owner/permittee shall demolish buildings 99, 103, 104, 107, 114, and 115 (see Appendix K2 of this EIR for building location) and properly dispose of all demolition debris. Following demolition of the building foundations, the soil shall be field screened for the most likely constituents of concern in areas where painting, cleaning, or solvent use was identified and where hazardous chemicals were known to have been used or stored. The soil samples shall be collected using ASTM and EPA protocol and sampling methodologies. If contamination is discovered above regulatory levels, the property owner shall take remedial action as appropriate. A written report shall be prepared and submitted to the City of San Diego that includes a synopsis of the work, documentation of laboratory analyses, verification of submittals to regulatory agencies and documentation of disposition of wastes.

4.12-3: Prior to the issuance of grading permits for the Sycamore Estates sub-project site, soil samples shall be taken from septic systems, storm water run-off areas, and container storage areas. Soil samples shall be collected from the leach fields in various locations below the depth of existing drain lines. The soil shall be sampled and analyzed for the most likely constituents of concern based on uses and activity at those locations using ASTM and EPA protocol and sampling methodologies. The following screening levels shall be utilized:

Constituent	Screening Level
Total Petroleum Hydrocarbons	50 PPM
Metals	1000 x TTLC
Volatile Organic Compounds in Soil	1000 x MCL for Drinking Water
TTLC- Total Threshold Limit Concentration MCL- Maximum Contaminant Level	

Additional assessments shall be made if the laboratory results exceed the above levels. If contamination is discovered above regulatory levels, the property owner shall take remedial action as appropriate. A written report shall be prepared and submitted to the City of San Diego that includes a synopsis of the work, documentation of laboratory analyses, and verification of submittals to regulatory agencies.

4.12-4: A Phase II site assessment shall be conducted and implemented prior to the issuance of grading permits on the Sycamore Estates sub-project site. The assessment shall identify detailed remediation efforts for sites A, B, D and J.

4.12-5: Prior to the issuance of grading permits for the Sycamore Estates sub-project, 100 yards around Cultural Resource Site CA-SDI-15159H shall be marked in the field by the construction supervisor and the project's hazardous materials consultant. These limits shall be identified on the grading plan. The project's construction supervisor shall submit a letter report to the City's ESD, verifying that these limits have been flagged in the field. During grading operations, unauthorized ground personnel shall not be allowed within the flagged area. The top one foot of soil removed from within the 100-yard area shall be stockpiled separately and examined by the project's hazardous materials consultant for the presence of ammunition. The examination results shall be documented and submitted to the City's ESD. If ammunition is found, MCAS Miramar and/or the San Diego bomb disposal squad shall be notified by the construction supervisor, and either of these parties would be responsible for its disposal.

4.12-6: During construction, if any soil contamination is suspected, e.g., by odor or visual means, construction shall temporarily cease at that location and the San Diego County Department of Environmental Health, Hazardous Materials Management Division (HMMD) shall be contacted. A workplan shall be prepared as required by the HMMD, the soil shall be sampled and the results shall be evaluated to determine if any further action will be necessary. If further action is necessary, measures shall be approved by the San Diego County HMMD to ensure appropriate remediation.

4.13 WATER CONSERVATION

4.13.1 EXISTING CONDITIONS

The Metropolitan Water District of Southern California (MWD) has supplied San Diego County, through the San Diego County Water Authority (SDCWA), with a source of potable water for the past 45 years. Depending on local weather conditions, typically 75 to 90 percent of San Diego County's water is imported. All SDCWA imported water is currently obtained from MWD, but a historic water transfer agreement with the Imperial Irrigation District (IID) is expected to begin in 2002. MWD's sources of imported water are the Colorado River and from sources in Northern California via the State Water Project. Colorado River water is imported by MWD via the 242-mile long Colorado River Aqueduct. Water from Northern California rivers is imported to MWD via the State Water Project's 444-mile MWD Aqueduct. The SDCWA takes delivery of water from MWD approximately six miles south of the Riverside-San Diego County line and transports it through five large-diameter pipelines to its member agencies. These agencies in turn deliver water directly to homes, businesses and other users. Local water sources account for five to 25 percent of the water supply and include surface water, wells, and reclamation.

The MWD, the CWA, and local jurisdictions are actively pursuing alternatives to supplement existing water systems and supplies in response to future water shortages. Alternatives being pursued to deal with potential problems associated with earthquakes, drought and continued population growth in major urban areas include resolution of problems associated with the California Aqueduct, transfer of water provided from federal projects and agricultural operations, construction of local emergency water storage reservoirs, water conservation and reclamation programs and desalination plants.

The CWA operates a number of effective long-term water conservation programs. A total water savings of over 25,000 acre-feet was realized during fiscal year 1998-99 because of these efforts. The CWA also continues to meet implementation standards for the Best Management Practices (BMP) for water conservation. The CWA reports that the residential Ultra-Low-Flush Toilet (ULFT) Incentive Program is the most prominent of the BMPs in operation during the year.

Ongoing planning for water reclamation plants within the City of San Diego will eventually provide for recycling of water entering the sewage system. This will help relieve the region's reliance on imported water. The City's Water Reclamation Ordinance requires that reclaimed water be used within the City wherever its use is justified and feasible. As part of the ordinance, the City adopted a Water Reclamation Master Plan to define, encourage, and develop use of reclaimed water within its boundaries. Benefits derived from the use of reclaimed water are numerous, including:

- Relief for the City's wastewater capacity limitations
- Use of an otherwise wasted resource
- Reduction of demand on the City's domestic water system
- Support for the Greater San Diego Clean Water Program's water reclamation implementation

For the past several years, the City of San Diego has been conditioning qualifying development projects within the city to install facilities for the use of reclaimed water to offset the demands of potable water of new planned uses. In 1992, the City completed a reclaimed water distribution plan for the City's northern service area. In September 1994 the MWD implemented an "optimized" reclaimed water distribution system for reclaimed water use in the City's northern service area, which is primarily served by the North City Water Reclamation Plant, located at Miramar Road and Eastgate Mall. This reclamation plant began to treat wastewater in April 1997. The North City Water Reclamation Plant is designed to treat up to 30 million gallons of wastewater per day. Reclaimed water is pumped through an approximately 45-mile long distribution system extending from Torrey Pines in the west to Scripps Ranch in the east. The proposed *Rancho Encantada* project area is located outside of the optimized system service area.

Issue 1: *Would the project's development result in direct and cumulative impacts to water supplies in the San Diego region?*

Significance Criteria

Impacts to water conservation would be considered potentially significant if:

- a. The project utilized an excessive use of water or did not incorporate water-conserving measures into the project design.
- b. The project is a moderate to large scale urban-level project in the Future Urbanizing Area.

Impact Analysis

The Project proposes 835 single-family lots, two institutional sites, 106 multi-family units, an elementary school site and a park site clustered into 12 planning areas. Because the site is located in the City's Future Urbanizing Area and is considered a large-scale project, it would result in a potentially significant water conservation impact pursuant to significance criterion "b." Although 75 percent of the site would be retained as natural open space, and although the development intensity of the Montecito sub-project would be consistent with its existing R-1-8 zone and the Rural Cluster Development Regulations of Council Policy 600-29, and although the Sycamore Estates sub-project would be rezoned to AR-1-1, allowing a much lower development intensity than permitted under its existing AR-1-1, IL-3-1 and IH-2-1 zoning, the Project's would be considered an urban-level development.

Implementation of the proposed Project would increase water demand within the project site by approximately 0.6 million gallons per day (MGD). Of this amount, the Montecito sub-project would use approximately 145,500 gallons of water per day, and the Sycamore Estates sub-project would use approximately 462,731 gallons of water per day. Water usage calculations are included in Section

4.11, PUBLIC FACILITIES, of this EIR. Additionally, short-term water consumption would occur during the construction phases of Project development. It is not anticipated that excessive amounts of water consumption would result from implementation of the proposed Project. Through adherence to the guidelines contained in the City of San Diego Water Utilities Development Planning and Design Guide and the City's Landscape Technical Manual, potential adverse impacts to the City's water supply would not be regarded as individually significant. Cumulative impacts associated with water use would be regarded as potentially significant, and could be partially mitigated by the measures listed below under "Mitigation Monitoring and Reporting Program."

Significance of Impact

Impacts would not be regarded as a significant direct and cumulative. Direct impacts would be mitigable. The increase in water usage that would occur with implementation of the proposed Project would, however, contribute to cumulative and unmitigable water conservation impacts in the City of San Diego (see Section 5.0, CUMULATIVE EFFECTS).

Mitigation, Monitoring and Reporting Program

Montecito and Sycamore Estates Sub-Projects

Implementation of the proposed *Rancho Encantada* Precise Plan's Design Guidelines would reduce, but not fully mitigate, significant cumulative water conservation impacts. Direct impacts would be mitigated to below a level of significance.

- 4.13-1: Prior to the issuance of grading permits, the incorporation of low water use plant species shall be verified by the City of San Diego Landscape Division as shown on the landscape construction drawings. Use of drought tolerant, low water or no water (native) species on all artificial slopes (where appropriate in consideration of brush management requirements and MHPA Adjacency Guidelines) shall be provided.
- 4.13-2: Prior to the issuance of grading permits, ~~the requirement for use of soil moisture override systems shall be verified by the City of San Diego Landscape Division as being shown on the landscape construction drawings. Soil moisture override systems shall be provided in all common irrigation areas to avoid over watering.~~ shall verify that all common irrigation areas shall be operated by a computerized irrigation system which includes a weather station/ET gage capable of reading current weather data and making automatic adjustments to independent program run times for each irrigation valve based on changes in temperature, solar radiation, relative humidity, rain and wind. In addition, the computerized irrigation system shall be equipped with flow sensing capabilities, thus automatically shutting down the irrigation system in the event of a mainline break or broken head. These features will assist in conserving water, eliminating the potential of slope failures due to mainline breaks and eliminating over watering and flooding due to pipe and/or head breaks.

- 4.13-3: Prior to the issuance of grading permits, appropriate plant groupings shall be verified by the City of San Diego Landscape Division as shown on the landscape construction drawings. Plants with similar water usage requirements shall be grouped together.
- 4.13-4: Prior to the issuance of building permits, the use of low flush toilets and low-flow faucets shall be noted on the architecture construction drawings and verified by the City of San Diego Building Division.

4.14 NATURAL RESOURCES

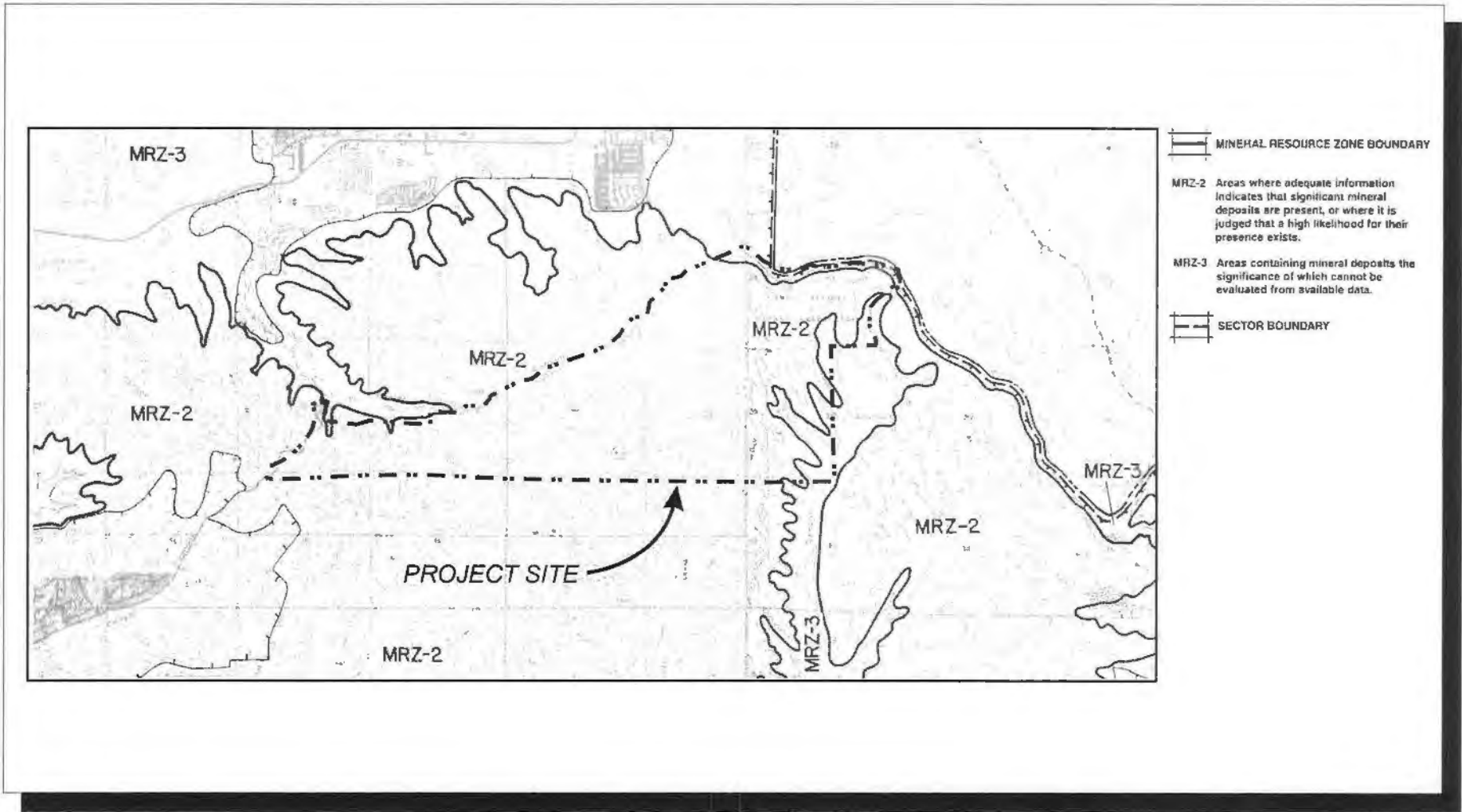
4.14.1 EXISTING CONDITIONS

□ AGGREGATE RESOURCES

The City of San Diego Progress Guide and General Plan's Conservation Element addresses the importance of sand and gravel mineral resources. The Conservation Element identifies the project site as containing Poway Conglomerate which is described as a local source of sand, gravel, road base material and aggregate for asphaltic concrete. Sand, gravel, and crushed rock are included among mineral commodities referred to as "construction materials." These commodities, collectively called "aggregate" provide bulk and strength to Portland cement concrete, asphaltic concrete, plaster and stucco. Aggregate is also used as road base, subbase and fill. The emphasis in western San Diego County is placed on portland cement concrete aggregate because the material specifications for this material are restrictive and deposits that are acceptable for Portland cement concrete are scarce.

The California Surface Mining and Reclamation Act of 1975 (SMARA) requires the California State Geologist to classify areas identified by the Office of Planning and Research into Mineral Resource Zones. These classifications are based on geologic factors without regard for existing land use and ownership. SMARA also requires that the State Geologist classify lands with potential significant mineral deposits located in certain areas of the state subject to urban expansion or land use incompatibilities with mining. The primary objective of mineral land classification is to assure that mineral potential and its significance is recognized and considered before land use decisions that could preclude mining are made. The availability of mineral resources is recognized as being vital to our society; yet for most types of minerals, economic deposits are rare. Because of land use competition, access to terrain for purposes of mineral exploration and mine development has become increasingly difficult. As a consequence, local planning agencies are often confronted with increasingly difficult land use decisions. If the mineral industry is to continue supplying mineral raw materials for California, it is essential that areas containing significant mineral resources be identified so that this information can be incorporated into land use planning decisions.

The California Division of Mines and Geology has prepared guidelines for local jurisdictions to follow in formulating and implementing its mineral resource policies. As defined by Special Report No. 153, the project site is located in the Western San Diego County Production Consumption (P-C) Region which covers the entire metropolitan area of San Diego County. The region is divided into Mineral Resource Zones (MRZs) based on guidelines adopted by the California State Mining and Geology Board. Aggregate materials are classified as either "reserves" or "resources." Reserves are defined by the California Division of Mines and Geology as "aggregate materials that a sand and gravel company owns or controls, and for which it has a valid mining permit." Resources are "the total amount of available aggregate within an area, including any reserves."



SOURCE: CALIFORNIA DEPARTMENT OF MINES & GEOLOGY



**Figure 4.14-1
MINERAL LAND
CLASSIFICATION MAP**

Mineral Resource Zones are described as follows:

- MRZ 1: Areas where adequate information indicates that no significant mineral deposits are present, or where there is little likelihood for their presence.
- MRZ 2: Areas where adequate information indicates that significant mineral deposits are present, or where there is high likelihood for their presence.
- MRZ 3: Areas containing mineral deposits, the significance of which cannot be evaluated from available data.
- MRZ 4: Areas where available information is inadequate for assignment to any other MRZ.

As shown on Figure 4.14-1, *Mineral Land Classification Map*, 94 percent of the project site is designated as a Mineral Resource Zone 2 (MRZ-2) and six percent of the project site is classified as mineral Resource Zone 3 (MRZ-3). Based on the preliminary geologic analysis and known mining activity within the study area, the entire site could potentially be suitable for mining, containing in-place aggregate capable of meeting all grade specifications. Depth of the deposits and variations of material grade or the presence of strata or groundwater has not been determined.

SMARA requires maintenance of a 50-year reserve supply of aggregate materials to serve the estimated needs of the County. To assist in the identification of a 50-year supply, CDMG Special Report 153 projected the aggregate need over a 50-year period to be approximately 760 million tons. According to the report, total aggregate reserves for the Western San Diego Production-Consumption (P-C) Region amount to 430 million tons, resulting in a deficit of 330 million tons over 50 years. It should be noted that these projections were based on field observations, analyses of water well records, available company information, and a broad understanding of local geology. No extensive drilling or rock quality laboratory analysis was conducted.

□ AGRICULTURE

The project site is not currently in agricultural use nor has it ever been used for agricultural purposes in the past. The California Land Conservation Act (CLCA) of 1965, also known as the Williamson Act, allows owners of agricultural land to have their properties assessed for tax purposes on the basis of agricultural production rather than current market value. Participation in this program is voluntary, and requires 100 contiguous acres of agricultural land under one or more ownerships to file an application for agricultural preserve status. The project site is not under such contract, nor is any property under contract that abuts the project site boundaries.

The Soil Survey for the San Diego Area, published by the U.S. Department of Agriculture, places soil units in grades that categorize their suitability for agricultural use. According to the United States Department of Agriculture Soil Survey, one soil type covers the Montecito sub-project site: Redding Cobbly Loam (15 to 50% slopes). For the Sycamore Estates sub-project site, eight different soil types cover this area: Redding Cobbly Loam (15-50% slopes), Olivenhain Cobbly Loam (9 to 30% slopes), Visalia Gravelly Sandy Loam (2 to 5%), Huerhuero Loam (2 to 9% slopes), Cieneba-Fallbrook Rocky

Sandy Loams (9 to 30% slopes), Ramona Sandy Loam (5 to 9% slopes), Friant Rocky Fine Sandy Loam (30 to 70% slopes), and Placentia Sandy Loam (2 to 9% slopes).

The Soil Survey for the San Diego Area evaluates soils for farming suitability and agricultural use. Table 4.14-1, *Soil Grades and Agriculture Suitability*, summarizes farming suitability for soil units on the *Rancho Encantada* site. The suitability rating is called the Storie Index and is based on soil characteristics obtained by an evaluation of soil depth, texture of the surface soil, density of subsoil, drainage, salts and alkali content, and topographic relief. Factors such as availability of water for irrigation, climate and distance from the market place, which might also determine the ability to farm in a given locality, are not considered in the evaluation. Therefore, the Storie Index gives a general idea of the quality of soils for agricultural use. Soils are placed in grades according to their suitability for general intensive farming as shown by their Storie Index ratings. Soils of Grade 1 are excellent and are well suited to general intensive farming. Grade 2 soils are good and are also well suited to farming, but they are less desirable than Grade 1 soils. Grade 3 soils are only fairly well suited, Grade 4 soils are poorly suited and Grade 5 are very poorly suited. Grade 6 consists of soils and land types that are not suitable for farming. Based upon the Storie Index rating for soils on the project site, no on-site soils are well suited for farming and three soil types are fairly suited for farming (i.e., soils which are classified as Grade 3).

Soil with a rating of Grade 5 (not suited for cultivated crops) encompasses 100 percent of the Montecito sub-project site, 100 percent of the City of San Diego parcel and 79 percent of the Sycamore Estates sub-project site. The remaining 17 percent of the Sycamore Estates sub-project site is comprised of six percent with soils rated Grade 4 (severely limited for crops), and 11 percent Grade 3 rated soils which are suitable only to a few crops or special crops and require special attention.

**Table 4.14-1
SOIL GRADES AND AGRICULTURE SUITABILITY**

SUB-PROJECT	MAP SYMBOL	% OF SITE	SOIL GRADE	SUITABILITY FOR FARMING
MONTECITO	RFF	100%	5	Not suitable to cultivated crops but can be used for pasture and range.
SYCAMORE ESTATES	RFF	79%	5	Not suitable to cultivated crops but can be used for pasture and range.
	OHE	6%	4	Severely limited for crops.
	VBB	5%	3	Suitable to a few crops or to special crops and require special management.
	HRC	3%	3	Suitable to a few crops or to special crops and require special management.
	CNE2	2%	5	Not suitable to cultivated crops but can be used for pasture and range.

	RAC	1%	3	Suitable to a few crops or to special crops and require special management.
	FXG	2%	6	Generally not suited for farming. FXG has no value for farming.
	PEC	2%	3	Suitable to a few crops or to special crops and require special management.
CITY OF SAN DIEGO	RFf	100%	5	Not suitable to cultivated crops but can be used for pasture and range.
RFF	REDDING COBBLY LOAM, 15 TO 50% SLOPES			
OHE	OLIVENHAIN COBBLY LOAM, 9 TO 30% SLOPES			
VBB	VISALIA GRAVELLY SANDY LOAM, 2 TO 5% SLOPES			
HRC	HUERHUERO LOAM, 2 TO 9% SLOPES			
CNE2	CIENEBA-FALLBROOK ROCKY SANDY LOAMS, 9 TO 30% SLOPES, ERODED			
RAC	RAMONA SANDY LOAM, 5 TO 9% SLOPES			
FXG	FRIANT ROCKY PINE SANDY LOAM, 30 TO 70% SLOPES			
PEC	PLACENTIA SANDY LOAM, 2 TO 9% SLOPES			

Source: U.S. Department of Agriculture Soil Survey, San Diego Area, California, December 1973

4.14.2 IMPACT ANALYSIS

Issue 1: *Would the proposed project prevent the future extraction of natural resources, such as sand and gravel?*

Significance Criteria

Implementation of the proposed project would result in significant impacts to aggregate resources if the project substantially reduced the potential to attain the 50-year aggregate supply in the Western San Diego County P-C Region.

Impact Analysis

Approximately 89.5 acres of the 278-acre Montecito sub-project site, approximately 1,106 acres of the 2,132-acre Sycamore Estates sub-project site and the entire 248-acre City of San Diego-owned parcel are located in the City’s MHPA, and as such these areas are already precluded from mining. Implementation of the proposed Project would result in eliminating the potential for future mining on the remainder of the project site. The total aggregate resources contained in western San Diego County amount to approximately 11,000 million tons (California Department of Conservation Division of Mines and Geology, 1982). The mapping of aggregate resources by the California Department of Conservation did not take into consideration land use policy constraints of local jurisdictions such as the City of San Diego’s MHPA. Thus, the actual total of available resources is likely less than 11,000 million tons. The *Rancho Encantada* Precise Plan area represents approximately two percent of Western San Diego County P-C Region’s mapped 11,000 million tons of aggregate resources. Taking into consideration local government constraints, however, the sub-projects would represent a larger

percentage of the actual available resources. Because of the small amount of area which would be removed from potential mining of aggregate material, this impact would not be considered a significant direct impact. Even though the amount of resource underlying the project site represents only a very small percentage of total aggregate production in San Diego County, preclusion of mining on the site would be regarded as a cumulatively significant impact to the County's total available aggregate supply (see Section 5.0, CUMULATIVE EFFECTS).

Significance of Impacts

Implementation of the proposed Project would eliminate the future potential to conduct resource extraction on the project site. This impact is not regarded as a significant direct impact because of the small amount of area which would be removed from potential mining of aggregate material.

Mitigation, Monitoring, and Reporting Program

There would be no significant direct mineral resource impacts by implementation of either the Montecito or Sycamore Estates sub-projects; therefore, no mitigation is required. Cumulative impacts would remain significant and unmitigable. Cumulative natural resource impacts would be eliminated by selection of the Resource Extraction Alternative (see Section 9.0).

Issue 2: *Would implementation of the Rancho Encantada Precise Plan convert agricultural land to non-agricultural use, impair existing agricultural activity, or prevent the future use of prime agricultural land?*

Significance Criteria

Agricultural resource impacts would be considered significant if the project would irreversibly convert prime agricultural soils to non-agricultural use, or if the project would impair existing agricultural activity.

Impact Analysis

The *Rancho Encantada* project site is not currently being used for agricultural uses, nor has it been previously farmed in the past. The steeply sloping natural topography of the site also is not conducive for the planting of agricultural field crops. Implementation of the proposed Project would therefore not impair or convert existing agricultural land to non-agricultural use. Using the U.S. Department of Agriculture Soil Survey, it was determined the vast majority of soils on the project site are not highly suitable for agriculture. Because prime agricultural soils are not located on the project site, impacts to agricultural resources would not occur.

Significance of Impacts

The *Rancho Encantada* project site contains soils that are not well suited for agricultural use. Because no agricultural uses exist on neither the Montecito nor Sycamore Estates sub-project sites, and because the site's soils are not highly suited for agricultural use, the preclusion of farming opportunities on this land would not represent a significant impact.

Mitigation, Monitoring, and Reporting Program

Impacts to agricultural lands would not be significant; therefore, no mitigation is required.

5.0 Cumulative Effects

Per Section 15355 of the State CEQA Guidelines, “*cumulative impacts*” refers to two or more individual projects which, when considered together, are considerable or which compound or increase other environmental impacts. These individual effects may be changes resulting from a single project or a number of separate projects. The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.

5.1 PROJECTS EVALUATED FOR CUMULATIVE EFFECTS ANALYSIS

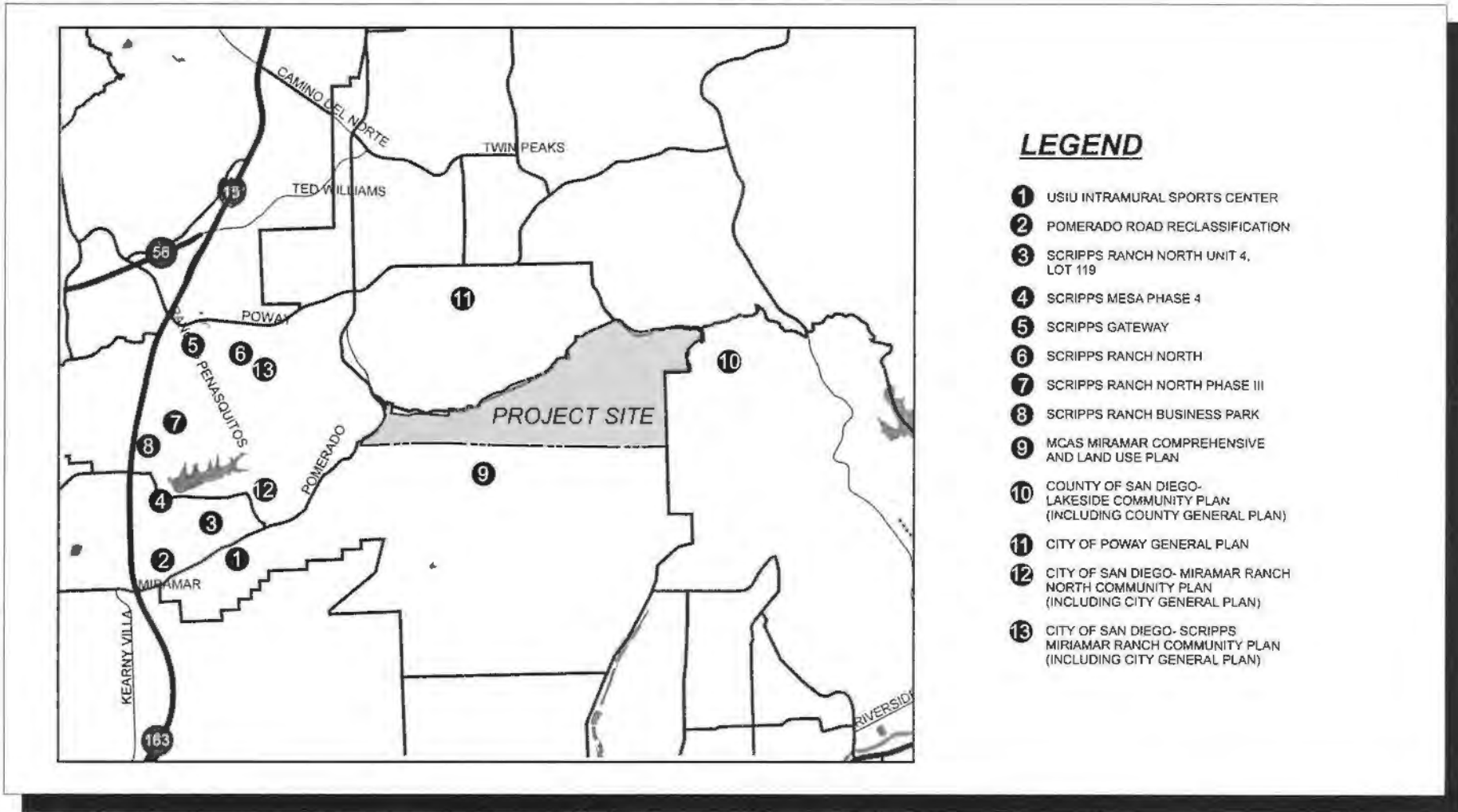
This section examines cumulative impacts on a regional or local basis depending upon the nature of the impact. For the purposes of this cumulative impact analysis, several scenarios (or “*universes*” as often described) of potential cumulative effects were considered. First, buildout of the City of San Diego as envisioned by the City’s Progress Guide and General Plan, and more specifically, buildout of the Scripps Miramar Ranch and Miramar Ranch North Communities, as well as buildout of the City of Poway as envisioned by the City of Poway General Plan, were evaluated for consideration in each cumulative effects analysis. Additionally, specific development projects which would not have been considered in community plan or general plan evaluations have also been considered. Cumulative air quality impacts evaluated buildout of the San Diego Air Basin as projected by the San Diego Association of Governments’ (SANDAG’s) Regional Growth Management Plan. Cumulative impacts to schools, water quality, and visual quality evaluated impacts associated with land development in the region and the local area.

The specific projects evaluated in this cumulative effects analysis are identified in Figure 5-1, *Projects Evaluated for Cumulative Effects Analysis*. Provided below is a brief summary of the general plans and community plans used in this analysis of cumulative effects as well as the development projects which have been individually evaluated for their contribution to cumulative effects.

5.1.1 LONG-RANGE PLANS CONSIDERED IN CUMULATIVE EFFECTS ANALYSIS

City of San Diego Progress Guide and General Plan

The *Rancho Encantada* Precise Plan area is located within the City of San Diego. The City’s Progress Guide and General Plan was last updated in June 1989. San Diego comprises 206,989 acres (323.4 square miles) and at present, approximately 30 percent of this land remains vacant. The City has an estimated population of 1.25 million and is expected to reach nearly 1.7 million by the year 2020 (SANDAG, 1999). Future population growth will force the City toward more urbanization.



**Figure 5-1
PROJECTS EVALUATED FOR
CUMULATIVE EFFECTS ANALYSIS**



Scripps Miramar Ranch Community Plan

The Scripps Miramar Ranch Community Plan area contains approximately 4,365 acres in the north-central part of the City of San Diego, north of the *Rancho Encantada* project site. The Scripps Ranch Community Plan was originally adopted August 1978. Very low density, low density, low-medium density, medium density and high-medium density residential uses are planned for the area, for a total of 1,575.5 acres. In addition, 355 acres are planned for an industrial park, approximately 858 acres for a school site, and 51 acres for a park site.

Miramar Ranch North Community Plan

The Miramar Ranch North Community Plan area contains approximately 1,835 acres and is located in the north-central part of the City of San Diego, predominantly within the northeastern limits of the City of San Diego, and is northeast of the *Rancho Encantada* project site. The Miramar Ranch North Community Plan was originally adopted March 1980. A total of 4,589 dwelling units are proposed, along with an 18-acre park, a 5-acre school and 33-acres dedicated to industrial uses.

□ City of Poway General Plan

The City of Poway is located north of the project site and encompasses 39.2 square miles with a population of approximately 49,500. Population of the City is expected to reach 53,338 in year 2020 (SANDAG, 1999). Immediately north of the *Rancho Encantada* project boundary is the South Poway Business Park, a 700-acre complex, encompassing the City's main commercial area. As part of the South Poway Planned Community, the Business Park includes light industrial and manufacturing, warehousing and distribution, and research and development businesses. Currently (December 1999), over 215 businesses with 8,200 employees are located in the Business Park. There is a total of 4,532,342 square feet of buildings, with 1,400,000 square feet under construction.

□ County of San Diego General Plan

Unincorporated San Diego County comprises approximately 3,572 square miles with a population of approximately 500,000. By year 2020, the unincorporated portions of San Diego County are expected to support a population of approximately 666,500 (SANDAG, 1999).

Lakeside Community Plan

Immediately east of the *Rancho Encantada* property is the County's Lakeside Community Planning Area. Goals of the Lakeside Community Plan are to maintain a rural atmosphere while providing for gradual growth. Areas located east of the Project are designated as Impact Sensitive Area or Multiple Rural Use (1 du for every 4, 8, or 20 acres) and are either included as part of the Sycamore Canyon County Open Space Preserve or are sparsely developed with rural residential home and ranches.

□ **MCAS Miramar Comprehensive Land Use Plan**

A Comprehensive Land Use Plan for Naval Air Station (NAS) Miramar was adopted by the San Diego Association of Governments for the air flight activities taking place at the base in 1990, and amended in 1992. The base was converted from naval to marine use in 1999, and the Marine Corps is currently in the process of preparing a new master plan for its use. Current development proposals at Marine Corps Air Station (MCAS) Miramar include four options for the construction of up to 1,600 military housing units. A Draft Integrated Natural Resources Management Plan (DINRMP) for MCAS Miramar is currently under review by the federal government. The DINRMP will govern MCAS Miramar's natural resource management program and the military operational requirements of the air station for the next five years.

5.1.3 DEVELOPMENT PROJECTS CONSIDERED IN CUMULATIVE EFFECTS ANALYSIS

The following discretionary actions were approved subsequent to the last amendment to their respective Community Plan.

- ***Scripps Ranch Business Park MND (LDR No. 99-0819)***. The proposed 100-acre, 15-lot Scripps Ranch Business Park Phase III is located east of Scripps Ranch Boulevard and south of Scripps Lake Drive. The project proposes a Rezone of four lots from M-IP to R-1500, a PRD Permit for three lots consisting of 378 multi-family apartment units; a PRD Permit for 305 age-restricted multi-family residential units, and a Conditional Use Permit for 165 assisted care units. An MND is under preparation for the project that evaluates impacts to biological resources, noise, transportation, schools, and parks. The MND has not yet been released for public review.
- ***USIU Intramural Sports Center MND (LDR No. 96-0122)***. The United States International University (USIU) Intramural Sports Center is identified in the Scripps Miramar Ranch Community Plan area and is located southwest of the *Rancho Encantada* project site. The project proposed a Conditional Use Permit to construct a 56,873 square foot indoor sports center and a 200-stall parking lot. The project's MND analyzed potentially significant impacts associated with transportation, biology, and paleontological resources. All impacts were mitigated to below a level of significance.
- ***Scripps Ranch North MND (LDR No. 94-0089)***. The Scripps Ranch North project is located in the Miramar Ranch North Community Plan, northwest of the *Rancho Encantada* project site and proposed development of 227 single family and 266 multi-family residential units and three commercial projects. A Mitigated Negative Declaration (MND) was prepared for the project which identified significant impacts associated with noise. Noise impacts were mitigated to below a level of significance through construction of a noise attenuation wall and use of upgraded construction materials.
- ***Scripps Ranch North Unit 4, Lot 119 SEIR (LDR No. 92-0496)***. Scripps Ranch North Unit 4 Lot 119 located in the Miramar Ranch North Community Plan area. The project proposed

development of 146 multi-family residences, three open space lots, streets and landscaping on 23 acres. A Supplemental EIR was prepared for the project which identified no new significant impacts beyond those previously disclosed by the Miramar Ranch North Community Plan EIR (EQD No. 85-0100). Significant and unmitigated impacts under the categories of landform alteration, visual quality and noise were identified in the Community Plan EIR and would remain with implementation of the subject project.

- ***Scripps Gateway EIR (LDR No. 92-0466)***. The Scripps Gateway project is 242 acres in size and located within the Miramar Ranch North Community Plan area. The project consists of 309 single family residential units, 135 multi-family residential units and 14.5 acres of commercial use. An EIR was prepared for the project and concluded that significant and unmitigated impacts would result in the areas of land use (direct and cumulative), landform alteration/visual quality (direct and cumulative), biology (cumulative), hydrology (cumulative), traffic circulation (cumulative), and air quality (cumulative). Impacts that were mitigated to below a level of significance included direct biology, noise, archaeological resources, hydrology/water quality and traffic and direct and cumulative impacts to public services and paleontological resources.
- ***Pomerado Road Reclassification EIR (LDR No. 91-0784)***. The Pomerado Road Reclassification project considered the reclassification of Pomerado Road from a four-lane major street to a two-lane collector street from I-15 east to Spring Canyon Road in the Scripps Miramar Ranch Community. An EIR was prepared for this project which identified potentially significant direct and cumulative impacts associated with traffic and air quality. These impacts would be created by traffic congestion, vehicle delay and vehicle emissions along the project segment of Pomerado Road.
- ***Scripps Ranch North Phase III SEIR (LDR No. 90-0898)***. The Scripps Ranch North Phase III project proposed to subdivide a 423-acre site, construct 822 residential units and a six-acre park adjacent to Miramar Lake. A Supplemental EIR was prepared which identified that development of the project would result in significant unmitigated impacts to landform alteration/visual quality and biological resources. Noise impacts also were identified, but were mitigated to below a level of significance.
- ***Scripps Mesa Phase 4 ND (LDR No. 90-0290)***. Scripps Mesa Phase 4 is located southwest of the *Rancho Encantada* project site and proposed a Manufacturing Industrial Park (MIP) Permit for the development of a three-story office building totaling 47,405 square feet on a 2.25-acre site, 189 parking spaces and landscaping. The Scripps Mesa Phase 4 Negative Declaration (ND) identified no significant environmental impacts.

5.2 CUMULATIVE EFFECTS ANALYSIS

Implementation of the proposed *Rancho Encantada* project has the potential to result in cumulative effects associated with landform alteration/visual quality, transportation, hydrology/water quality, air quality, landfill capacity, schools and water conservation.

5.2.1 LANDFORM ALTERATION/VISUAL QUALITY

Implementation of the *Rancho Encantada* project, along with existing and planned development in the vicinity, would result in a significant change in the landform and visual character of the area. The relatively undisturbed character of *Rancho Encantada*, which is predominately dominated by a series of canyons and ridges, would be replaced by residential development areas, similar in character to existing development in Scripps Miramar Ranch and Miramar Ranch North to the west. Development of the Project would replace the relatively undisturbed character of areas proposed for development with residential neighborhoods, roadways, two institutional sites, a public park and an elementary school site.

Development of the Montecito sub-project is consistent with the sub-project site's R-1-8 zone (formerly the R1-40,000 zone under the pre-2000 City Municipal Code) and development of the Sycamore Estates sub-project represents a rezoning of the property from AR-1-1, IL-3-1 and IH-2-1 to AR-1-1 (formerly A-1-10 under the pre-2000 City Municipal Code). Thus, the development intensity of the site would not exceed that anticipated for the property by the existing zoning.

There are no measures available to mitigate the area's transition from undeveloped land to suburban level development. Cumulatively significant landform alteration and visual quality impacts would be significant and unmitigated for the proposed Project, including both the Montecito and Sycamore Estates sub-projects. Landform alteration impacts would be reduced, but not to below a level of significance through the contouring of exterior manufactured slopes as specified in Section 4.2. The Project proposes general design concepts as part of the *Rancho Encantada* Precise Plan, including architectural standards and landscape themes that are complementary to surrounding land uses. Implementation of the design guidelines and development standards contained in the Precise Plan would reduce visual quality impacts, but not to below a level of significance.

5.2.2 BIOLOGY (NON-NATIVE GRASSLANDS)

The loss of non-native grasslands due to the development of the Project would result in cumulatively significant impacts to the white-tailed kite, Cooper's hawk, northern harrier and the black-tailed jackrabbit that forage on the site. Non-native grassland has been identified on the western border and in the northern portion of the Montecito sub-project site and a small patch in the north-central portion of the Sycamore Estates sub-project site. The Montecito and Sycamore Estates sub-project sites would both contribute to the cumulatively significant and unmitigated loss of non-native grassland.

5.2.3 TRAFFIC CIRCULATION

For the purposes of this cumulative effects analysis, traffic circulation assumes area buildout to be year 2020. As discussed in Section 4.6, TRANSPORTATION, the Project-generated traffic was distributed on the surrounding transportation network, and a regional traffic model was developed to reflect this Project and its proposed access. The regional model contains circulation element roadways, transit routes, and freeways for the entire region. The model also shows future transportation network and land uses. The City of Poway provided land use and network inputs to the City of San Diego in order to ensure that the model reflected the most up-to-date information in relation to planned development in Poway.

Roadway Segments

Based on the significance criteria previously outlined in Section 4.6, the addition of Project traffic to buildout year 2020 conditions would result in a significant cumulative impact on seven Pomerado Road roadway segments that would operate at LOS E or F with or without the addition of Project traffic at buildout. The significant cumulative impacts are a direct result of changes in the volume to capacity ratio in excess of the established City threshold of 0.02. Specifically, the changes in the volume to capacity ratio for the Pomerado Road roadway segments that would experience significant cumulative impacts from the addition of Project traffic at buildout include the following:

- I-15 to Willow Creek (0.180 Change in V/C Ratio)
- Willow Creek Road to Scripps Ranch Boulevard (0.196 Change in V/C Ratio)
- Scripps Ranch Boulevard to Chabad Court (0.209 Change in V/C Ratio)
- Chabad Court to Avenida Magnifica (0.209 Change in V/C Ratio)
- Avenida Magnifica to Fairbrook Road (0.209 Change in V/C Ratio)
- Fairbrook Road to Semillon Boulevard (0.209 Change in V/C Ratio)
- Semillon Boulevard to Spring Canyon Road (0.209 Change in V/C Ratio)
- Legacy Point to Treadwell Road/Creek Road (0.267 Change in V/C Ratio)

Intersections

The addition of Project traffic to the year 2020 roadway conditions would result in a significant cumulative impact to three intersections. These include:

- Scripps Poway Parkway/Pomerado Road (AM and PM peak hours)
- Pomerado Road/Willow Creek; and (AM and PM peak hours)
- Pomerado Road/Scripps Ranch Boulevard (AM peak hour)

At these three intersections, the addition of Full Buildout project traffic would contribute to existing LOS F conditions in the AM and PM peak hours.

Congestion Management Plan Roadway Segments

In conformance with the requirements of the Congestion Management Plan (CMP), peak hour arterial analysis was conducted for segments of Scripps Poway Parkway and Pomerado Road. With the addition of Project Buildout traffic, significant cumulative impacts would occur to the following two Pomerado Road CMP segments:

- Treadwell Road to Ted Williams Parkway (change from LOS D to LOS E, AM Peak Hour)
- I-15 to Treadwell Road (change from LOS D to LOS F, PM Peak Hour)

I-15 Freeway Ramp Meters

The addition of project traffic to year 2020 conditions would result in a significant cumulative impact at the I-15 westbound to southbound Miramar Road/Pomerado Road freeway ramp in the PM peak hour and at the I-15 eastbound to southbound Miramar Road/Pomerado Road freeway ramp in the AM peak hour.

I-15 Freeway Segments

All of the I-15 freeway segments studied for the proposed Project (between SR-163 and SR-56) will have LOS E or worse conditions under Year 2020 conditions with or without the addition of Project traffic at buildout. The Project would contribute traffic to the I-15 freeway, but would only result in volume to capacity ratio increases of between 0.000 and 0.00996. Due to this small increase, the Project would therefore not generate any significant traffic impacts on freeways.

Mitigation measures are included in Section 4.6 that would reduce transportation impacts to below a level of significance, with the exception of direct and cumulative impacts on Pomerado Road which would remain significant and unmitigated.

- The westbound to southbound on-ramp at Pomerado Road/I-15 is expected to have additional traffic delays and queues due in part to the impacts of the proposed project and to future growth in the area.
- The merging distance on the Pomerado Road to the east of the I-15 northbound off-ramp is expected to be inadequate for the expected demand. The off-ramp also is expected to lack queue storage.
- The Pomerado Road/I-15 northbound off-ramp is expected to provide inadequate off-ramp storage.
- The Pomerado Road/Scripps Poway Parkway Intersection is expected to operate at LOS F due in part to the impacts of the proposed project and to future growth in the area.

- Mitigation measures proposed for the segment of Spring Canyon Road between Scripps Ranch Boulevard and Pomerado Road propose the installation of traffic signals at four intersections along this roadway section. They include Spring Canyon Road, Spruce Run Drive, Sunset Ridge Drive and Semillon Boulevard.

5.2.4 HYDROLOGY/WATER QUALITY

Except for a small portion along the southeastern project boundary, the project site is located in the Penasquitos Watershed, which drains to Los Peñasquitos Lagoon, located approximately 12 miles west of the project site. Los Peñasquitos Lagoon covers about 385 acres and is recognized as an important coastal resource because of its unique flora and fauna. As urban development occurs within the watershed, viability of the Lagoon's flora and fauna can be adversely affected. The sensitive ecosystem of the Lagoon is affected by urban runoff which often carries pollutants that can upset the delicate balance of the Lagoon. Sedimentation is also an ongoing problem in the Lagoon and has been increasing with development of the surrounding area. According to the State Coastal Conservancy, sedimentation has a strong influence on keeping the mouth of the Lagoon closed, restricting tidal flushing that would benefit wildlife habitat. The San Diego Regional Water Quality Control Board (RWQCB) has designated the lagoon as a 303D impaired water body. That status means that the lagoon's water quality has been impaired due to heavy sedimentation and siltation. The RWQCB does not have a plan in place to prevent further impairment to the lagoon.

Under existing conditions, runoff from the project vicinity, including the *Rancho Encantada* Precise Plan area and surrounding areas, collects in natural drainage courses storm drains and eventually discharges to the Lagoon via existing storm drains. Fresh water enters the Los Peñasquitos Lagoon estuary through Carmel Valley Creek, Los Peñasquitos Creek and Soledad Canyon Creek (Carroll Canyon). Freshwater effects the lagoon by decreasing its salinity. The Project's civil engineers have estimated that on an annual average basis, the volume of fresh water leaving the Montecito sub-project site would increase from approximately 15 acre-feet per year (af/y) to 21.7 af/yr and the volume of fresh water leaving the Sycamore Estates sub-project site would increase from approximately 23 af/y to 32 af/yr. Fresh water leaving the site must travel more than 12 miles to reach Los Peñasquitos Lagoon. Due to this distance, a majority of the fresh water leaving the site either evaporates, is used by plants in photosynthesis, or percolates into the groundwater table.

Implementation of the proposed *Rancho Encantada* project, when considered in conjunction with other proposed developments and existing urban development within the Los Peñasquitos Lagoon watershed, could exacerbate the environmental impacts associated with drainage and watershed preservation and could further affect the hydrologic, hydraulic, and water quality of Los Peñasquitos Lagoon. Development of the natural areas on the property and the creation of impervious surfaces would cause an increase not only in the quantity of runoff, but also a decrease in the quality. Runoff flowing across these impervious surfaces and landscaping would contain pollutants such as oils, fuel residues, heavy metals (associated with gasoline), fertilizers, and pesticides which are typically associated with urban development. The pollutants could have diminishing effects on the water quality in streams and lagoons. This impact is considered significant on a cumulative level.

No measures are currently available to fully mitigate cumulative impacts of the project on the water quality of Los Peñasquitos Lagoon. Municipalities in the San Diego Region, including the City of San Diego, must comply with the California Regional Water Quality Control Board's (RWQCB) NPDES Permit No. CA 0108758, which consists of wastewater discharge requirements for storm water and urban runoff. In compliance with Permit No. CA 0108757, a Best Management Practices (BMP) Program for Storm water Pollution Control has been created by the City. The BMP details water quality control measures to be implemented on a City-wide basis. Projects shall implement BMP measures acceptable to the City Engineer which include, but are not limited to the following:

- Swales.* Swales are channels with a relatively mild longitudinal slope and shallow sideslope that are typically grassed or vegetated. Swales are typically located along roadways and other impervious areas.
- Filter Strips.* Sometimes called buffer strips, filter strips perform in a manner similar to swales but are not channels. Filter strips are mildly sloping vegetated surfaces that are located adjacent to an impervious surface area. They are designed to slow the velocity of the runoff from the impervious area, thereby increasing the opportunities for infiltration and the trapping of pollutants.
- Infiltration Basins and Percolation Trenches.* These treatment controls capture runoff generated by small storms and provide good storm water treatment by transferring surface runoff to the groundwater regime. This filters out suspended pollutants and provides other treatment processes before water returns to the surface systems.
- Detention Controls.* Detention controls include extended detention basins (dry) which drain out completely between storm events, and retention ponds (wet), which retain storm runoff from a given event within its permanent pool until the next storm occurs. Detention basins remove pollutants primarily through sedimentation of solids, but also through biochemical processes in the basin during the dry weather periods that follow storms.
- Continuous Deflective Separation (CDS) Units or Equivalent BMPs.* Continuous deflective separation units or equivalent BMPs capture and retain floatables, trash, and debris larger than 0.05 inches in size found in storm water runoff, as well as fine sand and larger particles and the pollutants attached to those particles.
- Drainage Inlet Inserts.* This category of structural BMPs includes pre-manufactured media filters in troughs and containers within inlets and catch basins configured to remove sediment, pollutants adsorbed to sediment, and oil and grease.
- Other Measures.* The specific locations and implementation strategies for construction site erosion and sediment control practices shall be outlined in the sub-project Storm Water Pollution Prevention Plan (SWPPP). Typical construction site erosion and sediment control practices that can be applied during construction phases of the Sycamore Estates and Montecito sub-projects may include, but not limited to the following: 1) temporary sediment basins, 2) silt

fences, 3) straw bale sediment traps, 4) storm drain inlet protection, 5) subsurface drains, 6) temporary slope drains, 7) grade stabilization structures, 8) storm drain outlet protection, 9) structural streambank protection, 10) temporary/permanent seeding, and 11) sodding/mulching.

Cumulative water quality impacts would remain significant and unmitigable because BMPs, although highly effective, are not 100 percent effective. This is due to potential mechanical failures of structural BMPs, human error in the implementation of non-structural BMPs, and because it is inevitable that a small percentage of urban runoff and sediment would not be effectively directed to a structural BMP.

5.2.5 AIR QUALITY

For the purposes of this cumulative effects analysis, the cumulative impact area for air quality is considered to be the entire San Diego Air Basin. Project-generated emissions, when considered with emissions from existing and reasonably foreseeable future projects, would cumulatively contribute to projected exceedances of ambient air quality standards in the San Diego Air Basin. Because the San Diego Air Basin is not in compliance with State air quality standards, the cumulative impacts to air quality at the regional level must also be considered significantly adverse.

5.2.6 SCHOOLS

A school-age population would be generated by development in *Rancho Encantada*, creating a demand for public education services and facilities. In total, 831 school students are estimated to be generated by the proposed Project, with 255 students generated by the Montecito sub-project and 576 students generated by the Sycamore Estates sub-project. Because the Montecito sub-project site would not require rezoning, implementation of the Montecito sub-project would not generate students in excess of that assumed for the property by the school district. The Sycamore Estates sub-project, however, does require rezoning and as a result would generate an estimated 576 students, which is more than presently expected by the School District.

Valley Elementary School, Poway High School and Rancho Bernardo High School, which serve the project area, are operating above capacity. The total addition of 439 elementary school students to the Valley Elementary School and the addition of 229 students to either Poway High School or Rancho Bernardo High School, would add to the overcrowding of existing school facilities. The addition of elementary and high school students to existing overcrowded conditions would result in a significant cumulative impact. The addition of 163 students to the Meadowbrook Middle School would result in an enrollment over the school's recommended capacity, which also is regarded as a significant cumulative impact.

As part of the proposed Precise Plan and the proposed Sycamore Estates PRD and VTM, an elementary school site is proposed on approximately 10 - 12 acres in the west-central portion of the Sycamore Estates sub-project site. The 10 - 12-acre site would be conveyed to the Poway Unified School District for the construction of an elementary school. Once constructed, this on-site elementary school would provide capacity for approximately 500 - 800 students and would accommodate the 439 elementary school students generated by *Rancho Encantada* as well as students from portions of

adjacent neighborhoods. The conveyance of this site to the Poway Unified School District would reduce the Project's cumulative impact on elementary school capacity to below a level of significance. If the Sycamore Estates sub-project is not developed or is not developed prior to development of the Montecito sub-project, cumulative impacts generated by the Montecito sub-project would be regarded as significant and mitigation would be required.

The Montecito sub-project applicant shall be required to pay statutory SB-50 fees in place at the time of building permit issuance. Payment of SB-50 fees would reduce cumulative impacts on elementary school capacity of the Montecito sub-project if the Sycamore Estates sub-project is not developed

In November of 1998, California voters approved Proposition 1A which provides funding for school construction and removes the requirement that local jurisdictions provide for mitigation of school impacts. Developers must pay a statutory mitigation fee. Payment of the mitigation fee would supplement the funding provided by Proposition 1A and would constitute full mitigation by the Project of its share of impacts, thereby reducing the Project's cumulative impact on the Poway Unified School District.

5.2.7 PALEONTOLOGICAL RESOURCES

Large portions of the project site are underlain by Stadium Conglomerate and Pomerado Conglomerate which have a high paleontological resource sensitivity. Implementation of the proposed Project would include grading in these areas, resulting in significant direct and cumulative paleontological resource impacts. A paleontological monitoring program is required during grading to reduce significant direct impacts to below a level of significance. Combined with other development projects underlain with geologic formations having high paleontological sensitivity, the cumulative impact to these resources would remain significant and unmitigable.

5.2.8 SOLID WASTE DISPOSAL (LANDFILL CAPACITY)

Solid waste would be generated from both the construction and operation of the proposed *Rancho Encantada* project. It is estimated that the Project would generate approximately 4,346 cubic yards of waste per year. The remaining landfill capacity of the Miramar Landfill as of January 1999, is approximately 28,300,000 cubic yards. Therefore, the Project's solid waste generation per year would occupy 0.01 percent of the total remaining landfill capacity. Accordingly, the project's small incremental impact on the Miramar Landfill would not be regarded as significant on a Project level. However, when considered in conjunction with existing and planned development, cumulative impacts on landfill capacity would be regarded as significant.

Municipal Code Section 101.2001 requires participation in the City's recycling program. The City of San Diego's recycling program is consistent with the California Integrated Waste Management Act (1989), which requires a 50 percent reduction by December 2000. With adherence to the requirements of the Integrated Waste Management Act and with the incorporation of mitigation measures presented in Section 4.11, PUBLIC FACILITIES, cumulative impacts would be partially mitigated.

5.2.9 WATER CONSERVATION

Implementation of the proposed Project would increase water demand within the project site by approximately 0.58 million gallons per day (MGD), which is not regarded as significant on a project level. However, when combined with water demand of other surrounding existing and planned projects, water conservation impacts would be potentially significant on a cumulative basis. Cumulative impacts associated with water use would be partially mitigated through observance of the proposed Precise Plan's design guidelines, which state that:

- Lifts of low clay content soil shall be provided in landscaped areas to improve water infiltration.
- Soil moisture override systems shall be provided in all common irrigation areas to avoid over watering.
- Plants with similar water usage requirements shall be grouped together.
- Low flush toilets and low-flow faucets shall be incorporated into the project design.

5.2.10 AGGREGATE RESOURCES

As stated in Section 4.14, NATURAL RESOURCES, the Rancho Encantada site is a potential mining site. Based on the preliminary geologic analysis and known mining activity within the study area, the entire site could potentially be suitable for mining, containing in-place aggregate capable of meeting all grade specifications. Implementation of the proposed project would result in cumulative impacts to aggregate resources because the project would incrementally reduce the potential to attain the 50-year aggregate supply in the Western San Diego County P-C Region.

7.0 CEQA Summary Sections

7.1 SIGNIFICANT ENVIRONMENTAL EFFECTS OF THE PROPOSED PROJECT

The significant environmental effects of the proposed project are discussed in detail in Section 4.0, ENVIRONMENTAL ANALYSIS, of this EIR. In summary, the project would have significant environmental effects on the following areas of the environment:

- a) land use (direct);
- b) landform alteration/visual quality (direct and cumulative);
- c) biological resources (direct; cumulative due to loss of non-native grasslands);
- d) geology/soils (direct);
- e) hydrology/water quality (direct and cumulative);
- f) transportation (direct and cumulative);
- g) noise (direct);
- h) air quality (direct and cumulative);
- i) cultural resources (direct);
- j) paleontological resources (direct and cumulative);
- k) public services of schools (cumulative), parks (direct), fire protection service (direct), and landfill capacity (cumulative);
- l) public safety (direct);
- m) water conservation (direct and cumulative); and
- n) natural (aggregate) resources (cumulative).

The Project's potentially significant direct impacts associated with impacts to biology, geology/soils, hydrology/water quality, noise, air quality, cultural resources, paleontological resources, public services, water conservation and public safety would be mitigated by the adherence to mitigation measures identified in this EIR. Direct land use impacts due to inconsistency with the Industrial Element of the City's Progress Guide and General Plan would remain significant and unmitigated. Direct and cumulative impacts associated with landform alteration/visual quality and transportation due to contribution of traffic to Pomerado Road, and cumulative impacts associated with biology (loss of non-native grassland habitat), hydrology/water quality, air quality, paleontological resources, water conservation and natural (aggregate) resources would remain significant and unmitigated.

7.2 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES WHICH WOULD BE INVOLVED IN THE PROPOSED PROJECT SHOULD IT BE IMPLEMENTED

Development proposed on the project site would result in the permanent loss of upland vegetation and wetland habitat. The loss of upland habitat would also result in the loss of habitat for the potentially-occurring California gnatcatcher, however, mitigation as proposed in Section 4.3, BIOLOGICAL RESOURCES, would avoid direct impacts to the species. The Project would mitigate the irreversible effect to wetlands through the on-site creation of wetlands. Paleontological resources which could be disturbed, would be salvaged, as necessary, and data recovered. Impacts to paleontological resources

would result in a significant irreversible change to a non-renewable resource. Significant direct impacts associated with paleontological resources would be mitigated to below a level of significance as described in Section 4.10, PALEONTOLOGICAL RESOURCES.

As discussed in Section 5.0, CUMULATIVE EFFECTS, the proposed Project would contribute to cumulative landform alteration/visual quality, transportation, hydrology/water quality, biology (non-native grassland), landfill capacity, schools, paleontological resources, water conservation, and natural (aggregate) resource impacts. Air and water quality conditions would degrade over the long term. A reversal of the cumulative degradation of air and water quality may occur over time with aggressive implementation of the Regional Air Quality Strategies and the NPDES program. Implementation of the proposed Project would result in cumulative impacts to natural (aggregate) resources, resulting in an irreversible change in the 50-year supply of aggregate resources available to Western San Diego County. Energy would be required both to construct the Project and to serve the project over the long-term. The primary energy source would be fossil fuels representing an irreversible commitment of this resource.

8.0 Growth-Inducing Effects

The project site is located in the City of San Diego's Future Urbanizing Area (FUA). As such, City Council Policy 600-29 is applicable to development of the project site. Council Policy 600-29, "Maintenance of the Future Urbanizing Area as an Urban Reserve," was enacted to avoid premature urbanization, to conserve open space and natural environmental features and to protect the fiscal resources of the City by precluding costly sprawl and/or leapfrog urban development. The proposed Project is consistent with the purpose and intent of Council Policy 600-29 by clustering development on select portions of the project site, thereby preserving a majority of the property (approximately 75 percent) as natural open space.

The *Rancho Encantada* project site is bordered on the south by Marine Corps Air Station (MCAS) Miramar. A Draft Integrated Natural Resources Management Plan (DINRMP) is currently under review by the Federal Government, which calls for preservation of the area south of the project site as open space. The Federal Government is considering four military housing options as part of the DINRMP, one of which places single-family residential units to the south of the project site. The proposed Project has been required by the City of San Diego to design its sewer system pipeline sizes to accommodate future residential development on MCAS Miramar and to provide a sewer easement to the Project's south property boundary. In this manner, the Project would have the potential to induce military housing development on MCAS Miramar.

Lying between the northerly edge of the site and Beeler Canyon Road is a tier of single-family residential lots of one acre to over four acres in size, which are accessed via Beeler Canyon Road. The construction of a sewer line in Beeler Canyon Road may induce some growth in this residential area; however, future development would be restricted by underlying R-1-8 and AR-1-1 zoning in the City of San Diego and OS/1DU zoning in the City of Poway.

West of the site is Pomerado Road and the communities of Scripps Miramar Ranch and Miramar Ranch North. These communities are predominantly built out with residential uses in the vicinity of the project site and are designed for urban levels of development by their respective community plans. East of the site is undeveloped land owned by the County of San Diego that is part of Sycamore Canyon County Open Space Preserve. Because this land is a dedicated preserve, it will be preserved as open space in perpetuity, restricting the opportunity for growth.

Implementation of the proposed Project would potentially induce growth along the Beeler Canyon Road because additional sewer line capacity would be available. The Project also would potentially induce the development of military housing south of the site on MCAS Miramar by providing a sewer easement to the Project site's south property boundary and by sizing on-site sewer lines to accommodate this potential development. Other than the limited area along Beeler Canyon Road and military housing on MCAS Miramar south of the site, growth would not be induced by the Project.

9.0 Alternatives

In accordance with Section 15126.6(a) of the State CEQA Guidelines, an EIR shall describe “a range of reasonable alternatives to the project, or the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project” as well as an evaluation of the “the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to the project. Rather, it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making. . . .”

This Section provides potential alternatives to the proposed Project and evaluates them as required by CEQA. Each major issue area included in the detailed impact analysis of this EIR (see Chapter 4.0) is included in the analysis of alternatives. In accordance with CEQA Section 15126.6(d), “the EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project.” CEQA also requires EIRs to identify the environmentally superior alternative from among the alternatives. The Reduced Project Alternative, described in Section 9.4, would be the most environmentally sensitive alternative that attains most of the objectives of the proposed Project. Section 9.7 and Table 9-1 summarize the “major characteristics and significant environmental effects of each alternative” (CEQA Section 15126.6(d)).

The goals and objectives of the proposed Project are listed in Section 3.1, PROJECT GOALS AND OBJECTIVES. A summary of the significant impacts which would result from the proposed Project is included in Chapter 7.0, CEQA SUMMARY SECTIONS.

The proposed Project was filed and has been analyzed under the provisions of the City of San Diego Municipal Code and Resource Protection Ordinance, which existed prior to January 1, 2000. It is assumed that if one of the alternatives provided below was selected by the decision maker, it would be approved under the auspices of the original application. Therefore, the alternatives, when appropriate, have been analyzed under the same provisions as the proposed Project. If a new application were to be filed in order to implement one of the alternatives, the provisions of the Land Development Code and Environmentally Sensitive Lands (ESL) ordinance would apply, and additional environmental review may be required.

9.1 ALTERNATIVES CONSIDERED BUT REJECTED

9.1.1 PHASE SHIFT ALTERNATIVE

The project site is located in the City’s Future Urbanizing Area (FUA) and as such is subject to the City’s Managed Growth Initiative and Council Policy 600-29. The proposed Project, as described in Section 3.0, PROJECT DESCRIPTION, proposes development under Council Policy 600-29, which permits four development options on property located in the FUA which is zoned agricultural. The Project is proposing development in accordance with the Policy’s “Rural Cluster Development Regulations” which allows development at the density permitted in the applicable zone, but clustered in order to promote more efficient land utilization and land conservation. As such, the proposed

Project is not required to undertake a phase shift via a citywide vote per the Managed Growth Initiative.

Except for development as permitted under Council Policy 600-29, Proposition A, the "Managed Growth Initiative," specifies that the existing non-urban land use pattern and character of the Future Urbanizing Area should be retained until such time as the City Council and the electorate approve a phase shift reclassifying the land from Future Urbanizing to Planned Urbanizing and a land use plan is adopted. Under the Phase Shift Alternative, a land use plan would be proposed for the project site, specifying a land use pattern containing a mix of uses including single-family and multi-family residential, commercial, business office, recreational, and institutional, as well as parks and open space. The land use plan would designate more intense use of the land than that proposed by the Project, resulting in greater environmental impacts in almost all of the environmental issue areas discussed in Section 4.0 of this EIR. More intense use of the land would increase impacts in traffic, noise, air quality, water quality/urban pollutants, water conservation and public services. It is also likely that more land area would be disturbed under the Phase Shift Alternative as compared to the proposed Project and that the MHPA would not be expanded on the Sycamore Estates sub-project site as proposed by the Project. Additional land disturbance would increase impacts to landform alteration, visual quality, biology, geology/soils, and paleontological resources.

The land use plan would have to be approved by the San Diego City Council, prior to placement of the Phase Shift proposal on the ballot for consideration by a vote of the people to shift the project site from the Future Urbanizing to Planned Urbanizing Tier. This Alternative was rejected because environmental impacts would be substantially increased as compared to the proposed Project.

9.1.2 NO PRECISE PLAN/ALTERNATIVE PROJECT ACCESS ALTERNATIVE

As discussed in Section 1.2, PROJECT BACKGROUND, the applicants for the Montecito and Sycamore Estates sub-projects submitted individual Planned Residential Development Permit (PRD) applications and Vesting Tentative Map (VTM) applications to the City in 1999. Under this Alternative, it is assumed that the original Montecito and Sycamore Estates PRD and VTM applications would be processed as originally submitted to the City. The Montecito PRD and VTM applications were deemed complete on March 30, 1999, and the Sycamore Estates PRD and VTM applications were deemed complete on September 13, 1999. Similar to the proposed PRDs and VTMs described in Section 3.0, PROJECT DESCRIPTION, the Montecito application proposed single-family residential development, and the Sycamore Estates application proposed single-family and multi-family residential development, as well as a park site. No institutional uses were proposed; however, the initial Sycamore Estates application considered the retention of a six-acre industrial area on the site. The two sub-projects were not related, and a Precise Plan was not proposed (see Section 1.2 PROJECT BACKGROUND). A roadway connection (e.g., Rancho Encantada Parkway) was not proposed between the two sub-project sites, and the primary access for Sycamore Estates was to the north through the City of Poway.

Although the PRDs and VTMs proposed for the Montecito and Sycamore Estates sub-projects are still being processed by the City independently from one another, and are evaluated by this EIR as independent implementing actions, they are both subject to the proposed *Rancho Encantada* Precise

Plan and have been revised to coordinate roadway grades at the common property boundary. The Sycamore Estates VTM now proposes the construction of Rancho Encantada Parkway through the Montecito sub-project site as an off-site improvement so that Sycamore Estates' primary access is Pomerado Road via Rancho Encantada Parkway.

Under this Alternative, the northerly roadway connection crosses Beeler Canyon on a fill section of over 30 feet of fill. The fill and roadway would impact wetlands and the major east/west wildlife corridor in the canyon. The traffic impacts would not differ significantly from the traffic impacts associated with the proposed Project, with the exception of impacts to Beeler Canyon Road. More project traffic would be expected to use Beeler Canyon Road under this Alternative than under the proposed Project. A Precise Plan would not be approved, and no long-range plan would be considered for the area. This Alternative was rejected in favor of the proposed Project because the Precise Plan would ensure better coordination of the two adjacent sub-projects with regard to general guidelines and standards for grading, erosion control, architecture, landscaping, brush management, wall and fence design, lighting, and conservation. In addition, with selection of this Alternative, land use, traffic and noise impacts would be increased along Kirkham Way and off-site impacts along this roadway segment would occur due to its necessary widening and improvement. In addition, impacts to Beeler Canyon, including wetlands impacts and impacts to the east/west wildlife corridor would increase.

9.1.3 ALTERNATIVE SITES

CEQA does not require that analysis of alternative sites always be included in an EIR. However, if all the surrounding circumstances make it reasonable to consider an alternative site then this alternative should be considered and analyzed in the EIR. In making the decision to include or exclude analysis of an alternative site, the *"key question and first step in analysis is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Only locations that would avoid or substantially lessen any of the significant effects of the project need to be considered for inclusion in the EIR"* (CEQA Guidelines §15126.6(f)(2)).

To begin the process of selecting a potential alternative location for the purposes of environmental review, a cursory review of road maps and aerial photographs of property within the general Project vicinity were examined in an attempt to identify sites that were approximately 2,600 acres in size (or greater), and were potentially undeveloped and available for private development. Potential sites were evaluated according to six primary criteria: 1) existing land use and available urban infrastructure; 2) land use designation and zoning; 3) environmental constraints; 4) availability for private development; 5) accessibility; and 6) ownership. Sites within the City of San Diego evaluated include: San Pasqual Valley, Otay Mesa, and North City Future Urbanizing Area (NCFUA).

No alternative sites were considered reasonable alternatives under the provisions of CEQA. In addition, the project proponents do not own any other parcels of land in the proximity of the project site suitable for development of the *Rancho Encantada* project. In light of this review and consideration of all surrounding circumstances, it has been concluded that there are no feasible alternative sites for the proposed Project.

9.2 NO PROJECT – EXISTING ZONING ALTERNATIVE

As stated in the State CEQA Guidelines Section 15126.6(e)(3)(c), an EIR shall “analyze the impacts of the no project alternative by projecting what would reasonably be expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services.” If the proposed *Rancho Encantada* project is not approved by the City of San Diego, the site could be developed in accordance with its underlying zoning, taking into consideration existing utility easements and the City’s MHPA and Council Policy 600-29. Figure 2-8, *Existing Zoning*, in Chapter 2.0, ENVIRONMENTAL SETTING, provides an illustration of the project site’s existing zoning.

Necessary discretionary actions would include Planned Development Permits (PDPs) for each of the sub-projects, as well as VTMs and individual Resource Protection Ordinance (RPO) permits. A Precise Plan or other long-range plan would not be considered under this Alternative.












9.2.1 DESCRIPTION OF THE NO PROJECT – EXISTING ZONING ALTERNATIVE

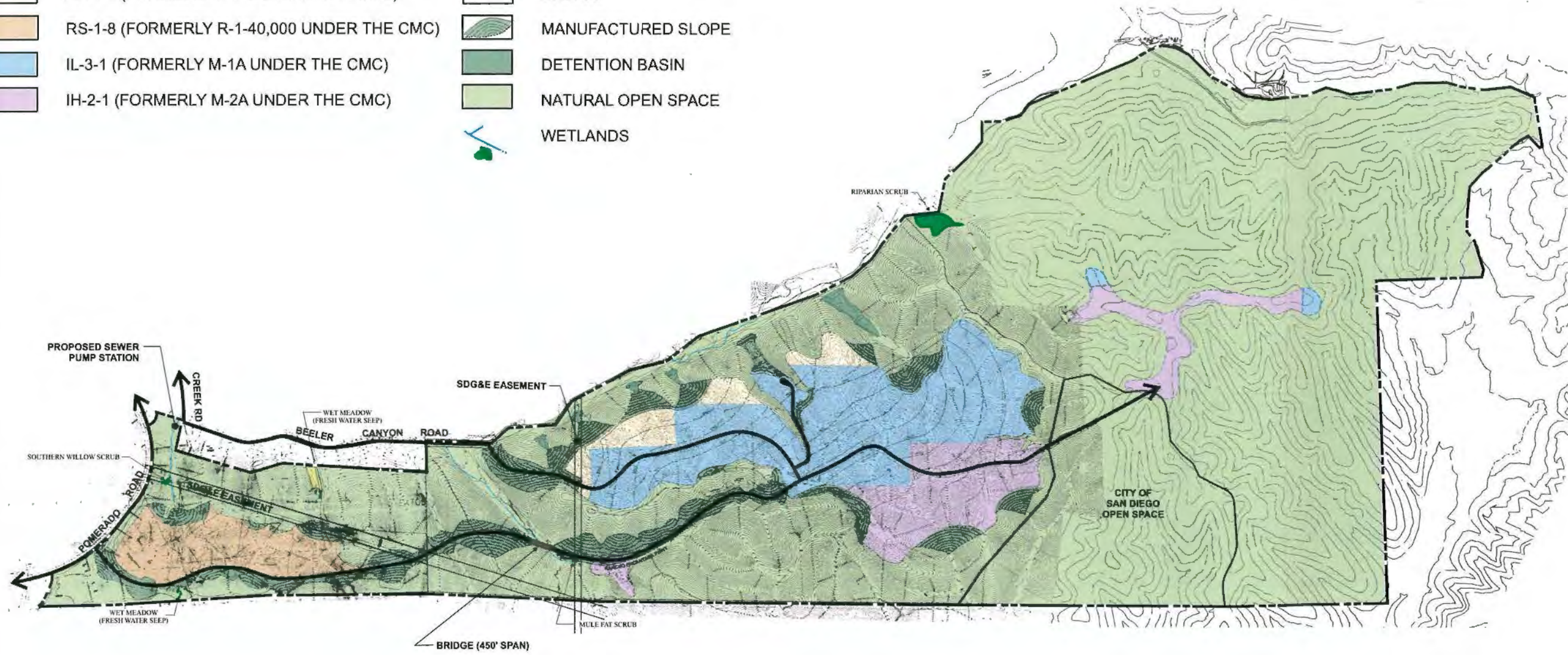
Figure 9-1, *No Project – Existing Zoning Alternative*, depicts a conceptual land use plan for this Alternative. In total, a maximum of 452 residential units would be developed, with 278 units occurring on the Montecito sub-project site and 174 units occurring on the Sycamore Estates sub-project site. Approximately 222 net acres would be developed with manufacturing/industrial uses on Sycamore Estates, including the retention of existing industrial uses on the property. Approximately 621 acres of the site would be graded or disturbed. Compared to the proposed Project, this Alternative represents a reduction of 489 residential units, the introduction of manufacturing/industrial use areas to the site, and a decrease of approximately 122 acres of graded area. The proposed land use configuration would comply with the provisions of RPO by avoiding impacts to wetlands and limiting encroachments into steep slopes and sensitive biological resources to below that permitted by RPO. A description of the land uses that would occur under the No Project - Existing Zoning Alternative by sub-project site is described below.

Montecito Sub-Project

The Montecito sub-project site is zoned R-1-8 (formerly R1-40,000 under the City’s pre-2000 Municipal Code), a residential zone that requires a minimum of 40,000 square feet per each residential unit. North of the existing SDG&E easement, the site would be retained as open space, with the exception of one single-family residence that would be retained near the northern site boundary. The existing SDG&E easement also would be retained in its existing location. Based on the site’s existing R-1-8 zoning and pursuant to Council Policy 600-29’s Rural Cluster Development regulations, 277 units would be developed in the southern portion of the site as a Planned Residential Development (PRD). *Rancho Encantada Parkway* would traverse the southern portion of the property, similar to the alignment proposed by the proposed Project, and would account for approximately 9.1 acres. An 8.4-acre MHPA boundary adjustment would occur on-site, and approximately 186 acres of the site would be preserved as natural open space. Detention facilities and other infrastructure such as water and sewer lines would be necessary within the open space, similar to that proposed by the Project.

LEGEND

- | | | | |
|---|--|---|--------------------|
|  | RURAL RESIDENTIAL (1 EXISTING RESIDENCE) |  | MAJOR ROADS |
|  | AR-1-1 (FORMERLY A-1-5 UNDER THE CMC) |  | BRIDGE |
|  | RS-1-8 (FORMERLY R-1-40,000 UNDER THE CMC) |  | MANUFACTURED SLOPE |
|  | IL-3-1 (FORMERLY M-1A UNDER THE CMC) |  | DETENTION BASIN |
|  | IH-2-1 (FORMERLY M-2A UNDER THE CMC) |  | NATURAL OPEN SPACE |
| | |  | WETLANDS |



CMC = City of San Diego Municipal Code in effect prior to January 1, 2000

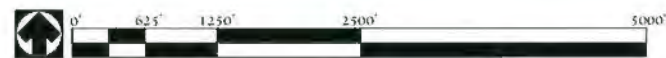


Figure 9-1
EXISTING ZONING ALTERNATIVE

Compared to the proposed Montecito sub-project described in Section 3.0, PROJECT DESCRIPTION, the same number of residential units would be developed under this Alternative; however, lot sizes would be reduced and limited to a graded area of 92 acres. This represents a reduction of graded area by 61 acres as compared to the proposed Project.

Sycamore Estates Sub-Project

The Sycamore Estates sub-project site is zoned AR-1-1, IL-3-1 and IH-2-1 (formerly A-1-5, M-1A and M-2A, respectively under the City's pre-2000 Municipal Code). The eastern portion of the Sycamore Estates sub-project site is included in the MHPA and would be retained as open space under this Alternative. The AR-1-1 (formerly A-1-5) zone is an agricultural classification that allows residential development at a minimum density of one unit per five acres. Approximately 870 acres of the Sycamore Estates site are zoned AR-1-1, thus, a maximum of 174 residential units could be developed on the site in accordance with existing zoning. Per Council Policy 600-29, residential development on the site can be clustered to conserve open space and natural environmental features. Thus, under this Alternative, up to 174 units could be clustered within the western and northern portions of the sub-project site, on approximately 39 acres zoned AR-1-1 (average density: 4.6 du/ac).

IL-3-1 and IH-2-1 are industrial classifications that cover approximately 1,262 acres of the sub-project site. The IL-3-1 and IH-2-1 zones allow for such uses as vehicle sales, wholesale, distribution, storage, and light manufacturing. The IL-3-1 zone also allows retail sales, commercial services and offices, and the IH-2-1 zone allows heavy manufacturing. Five existing industrial use areas also would be retained on the property under this Alternative and would either retain their existing uses or would be developed with uses compatible with surrounding uses, including the MHPA. Taking environmental constraints, including the MHPA, and other factors such as grading balance into consideration, approximately 238 222 acres of the sub-project site would be developed with manufacturing/industrial uses. Industrial areas would be graded to include large, flat pads necessary to accommodate large buildings and parking areas.

Rancho Encantada Parkway would connect westward to the Montecito sub-project site, and would be bridged in one location to avoid wetland impacts. The bridge would span approximately 450 feet in length. Street B would connect to Beeler Canyon Road. Beeler Canyon Road would be improved to an Industrial Collector along its length to accommodate traffic increases, including additional truck traffic. Including all necessary manufactured slopes necessary to create development pads, approximately 529 acres of the sub-project site would be graded or disturbed.

Compared to the proposed Sycamore Estates sub-project described in Section 3.0, PROJECT DESCRIPTION, the number of residential units would be reduced from 663 to 174, a reduction of 489 units. The Alternative assumes that monetary contributions would be made in lieu of the construction of a school and park site and that the two institutional sites would not be developed. The total amount of graded area would be decreased as compared to the proposed Project, with this Alternative representing a 61-acre disturbance area reduction.

9.2.2 ENVIRONMENTAL ANALYSIS OF THE NO PROJECT – EXISTING ZONING ALTERNATIVE

Land Use: This Alternative would eliminate the significant land use impact of the proposed Project associated with the Industrial Element of the Progress Guide and General Plan which recommends that industrial and manufacturing lands be protected from encroachment by non-manufacturing uses.

The No Project - Existing Zoning Alternative would result in land use conflicts with Council Policy 600-29/Proposition A associated with the development of manufacturing uses on the Sycamore Estates sub-project site. Except for residential development as permitted under Council Policy 600-29, Proposition A, the "Managed Growth Initiative," specifies that the existing non-urban land use pattern and character of the Future Urbanizing Area should be retained until such time as the City Council and the electorate approve a phase shift reclassifying the land from Future Urbanizing to Planned Urbanizing and a land use plan is adopted.

This Alternative would be consistent with the Resource Protection Ordinance by avoiding impacts to wetlands and by limiting disturbance of steep hillsides and sensitive biological resources to below that permitted by RPO. Each sub-project would be required to obtain an individual RPO permit under this Alternative.

Conflicts with the land use adjacency guidelines of the City's MSCP could occur due to lighting, noise and urban runoff typically associated with industrial uses and large impervious surfaces such as parking lots, but would be mitigable. Internal land use conflicts also could occur due to the placement of industrial uses immediately adjacent to proposed residential areas. This land use impact could be mitigated by an elevation difference, the construction of a wall to separate the uses, landscaping, or other buffering method. Noise, odor, lighting, public safety, and other nuisance impacts are common at industrial/residential land use edges. In addition, heavy truck traffic and associated vehicular noise and air quality impacts typically associated with industrial uses could potentially circulate through on-site residential areas and on Beeler Canyon Road, which provides access to an existing rural residential area. The circulation of heavy truck traffic through existing and proposed residential areas would be regarded as a significant land use compatibility impact. This potential significant land use impact to on-site residential uses could be mitigated through a project design that segregated truck traffic and buffered residential uses.

Visual Quality/Landform Alteration: Approximately 622 acres would be graded or disturbed, including 92 acres of the Montecito sub-project site and 529 acres of the Sycamore Estates sub-project site. Less land area would be graded under this Alternative (a 122-acre decrease) as compared to the proposed Project. The per-acre grading quantity would be significantly increased due to the need to create large flat pads for manufacturing/industrial uses on the Sycamore Estates sub-project site. On the Montecito sub-project site, several gently sloping residential pads would be created south of the existing SDG&E easement and portions of two canyons would be filled that would be preserved under the proposed Project.

Landform alteration impacts would be significant and unmitigable due to grading quantities exceeding the significance threshold of 2,000 cubic yards per graded acre and the creation of manufactured slopes at heights well over 10 feet. This impact could be reduced through implementation of partial mitigation measures for contour grading similar to those that would be applied by the proposed Project.

Implementation of the No Project – Existing Zoning Alternative would change the visual appearance of the project site from an undeveloped property to that of residential and industrial uses surrounded by open space. Development of the site under this Alternative would not block public views. Industrial uses would occur interior to the Sycamore Estates sub-project site and although they may be visible from higher elevations in the City of Poway, would not block views to any scenic vista. Similar to the conclusion reached for the proposed Project, because implementation of this Alternative would result in a transformation of the site from a largely natural view to a view of development and because view would appear monotonous from a distance, visual quality impacts would be regarded as direct and cumulatively significant. Because industrial uses typically involve the construction of large buildings and parking areas, the bulk and scale of structures on the Sycamore Estates sub-project site would be greater than the residential uses proposed by the Project. In this regard, visual quality impacts would be increased as compared to the proposed Project. Significant and unmitigable direct and cumulative visual quality impacts would occur, similar to the proposed project.

Biological Resources:

Implementation of this Alternative would result in fewer impacts to biological resources as compared to the proposed Project. Implementation of this Alternative would reduce impacts to biological resources over that which would occur with implementation of the proposed Project, because the disturbance area would be reduced by approximately 122 acres. The following impacts to vegetation communities would occur:

Vegetation Community	Montecito Sub-Project Site	Sycamore Estates Sub-Project Site
Oak Woodland	--	2.9
Diegan Coastal Sage Scrub (& disturbed)	24.7	118.5
Southern Mixed Chaparral (& disturbed)	29.8	184.2
Chamise Chaparral (& disturbed)	33.7	136.2
Non-Native Grassland	3.3	8.5
Developed/Disturbed Habitat	0.5	78.7
Totals	92.0	529.0

No impacts to wetlands would occur on the project site under this Alternative. Industrial development would occur in a portion of the watershed for the off-site willowy monardella, but

this impact would be mitigated to below a level of significance through the diversion of urban runoff away from the population and from the incorporation of Best Management Practices to minimize sedimentation impacts. Impacts to long-term conservation of biological resources would not occur under this Alternative, because no encroachment into the MHPA would occur on the Sycamore Estates sub-project site, and because an 8.4-acre MHPA boundary adjustment would occur on the Montecito sub-project site that would be functionally equivalent. The development of industrial uses adjacent to the MHPA may result in inconsistencies with the MSCP's land use adjacency guidelines with regard to noise, lighting and urban runoff. Such inconsistencies could be mitigated through minor design modifications and/or other mitigation measures, such as sound attenuation, directed lighting techniques and Best Management Practices to control urban runoff.

Geology and Soils: Overall, grading would be decreased on the project site by approximately 122 acres as compared to the proposed Project, including a reduction of 61 acres on the Montecito sub-project site and a reduction of 61 acres on the Sycamore Estates sub-project site. Erosional impacts associated with grading and construction would be slightly reduced on the site as compared to the proposed Project. Development in accordance with required geotechnical report recommendations would reduce potential geologic hazard impacts. Overall, the effects to Geology and Soils would be significant and mitigable.

Hydrology/Water Quality: Cumulative water quality impacts associated with urban pollutants would be decreased on the Montecito sub-project site due to a reduction in impervious surface area, and would be increased on the Sycamore Estates sub-project site because more impervious surface area would be developed for the industrial uses. Manufacturing/industrial areas are oftentimes used for storage of cars, trucks, heavy equipment, and materials, some of which are considered hazardous under State and Federal regulations. The potential quantity and toxicity of vehicle and industrial pollutants entering sensitive surface water bodies and groundwater would be substantially increased under the No Project – Existing Zoning Alternative for the Sycamore Estates sub-project. As with the proposed Project, this Alternative's potential direct impacts to water quality would be significant and mitigable through implementation of NPDES standards along with other potential regulations governing chemical use on site. Also, Best Management Practices would be employed, similar to the proposed Project, but additional measures may be required as compared to the proposed Project. This Alternative's cumulative water quality impacts would be significant and unmitigated.

Transportation: Approximately 2,770 ADT would be generated by the Montecito sub-project under either the proposed Project or this Alternative, because the number of dwelling units would be unchanged. Because Montecito's primary access would be from Pomerado Road, trip distribution under this Alternative also would be the same as the proposed Project for the Montecito sub-project.

Implementation of the No Project – Existing Zoning Alternative would result in increased traffic generation as compared to the proposed Project on the Sycamore Estates sub-project

site. Using conservative trip generation rates of 200 ADT/acre for manufacturing/industrial uses and 10 ADT/residential unit, approximately 46,140 ADT would be generated by the Sycamore Estates sub-project site under this Alternative, which is an increase of 38,352 ADT as compared to the proposed Project. Sycamore Estates traffic could be distributed in two manners, using either Beeler Canyon Road or Rancho Encantada Parkway as the primary access road. If Beeler Canyon Road is used, it would be upgraded to a Collector Road and a significant direct impact would be created at the intersection of Creek Road/Pomerado Road. If Rancho Encantada Parkway is used, a significant direct impact would occur at Rancho Encantada Parkway/Pomerado Road. In either case, cumulative traffic impacts would be increased under this Alternative. Also, because manufacturing/industrial truck traffic would potentially circulate through the residential portions of Sycamore Estates and/or off-site residential areas adjacent to Beeler Canyon Road, vehicle conflicts with pedestrians and bicyclists would increase with this Alternative.

Noise: Similar to the proposed Project, vehicular noise impacts on-Rancho Encantada Parkway would require the construction of a noise wall between the roadway and adjacent homes where homes would be located closer than 80 feet to the roadway centerline. If industrial truck traffic uses Rancho Encantada Parkway, this distance would be increased from 80 feet to 200 feet. Due to the development of industrial uses on the Sycamore Estates sub-project site, traffic generation would be increased, and vehicular noise impacts would occur along the length of Beeler Canyon Road, potentially requiring the construction of noise attenuation walls where the roadway abuts residential uses. Detached residential homes proposed adjacent to Rancho Encantada Parkway and other impacted roadways would be required to be constructed with architectural components that attain of a 45 dB CNEL interior noise level. Off-site vehicular noise levels also would be increased, creating a significant cumulative noise impact along segments of Pomerado Road and Spring Canyon Road.

Another important issue would be the interface of the industrial and residential land uses. The industrial uses, including truck loading and manufacturing uses would create potentially significant noise levels at nearby residential uses. This would be an additional significant issue for this Alternative when compared with the proposed Project. These increased noise levels could be mitigated through minor design modifications and/or other mitigation measures, such as sound attenuation and buffering.

Air Quality: Short-term fugitive dust (PM-10) impacts generated during construction would be regarded as significant and would be decreased as compared to the proposed Project because less land area would be disturbed (a 122-acre decrease). The contribution to the San Diego region's current inability to meet air quality standards would be considered a cumulatively significant impact, similar to that of the proposed Project. Depending on the ultimate uses that could occur within the industrial areas of the Sycamore Estates sub-project site, direct air quality impacts associated with stationary sources could be regarded as potentially significant and would be analyzed during site-specific environmental review.

Cultural Resources: No important cultural resources are located on the Montecito sub-project site. The significant direct, but mitigable, direct cultural resource impact on the Sycamore Estates sub-project site would be avoided under this Alternative, because the area containing the potentially significant cultural resource site would be preserved as open space.

Paleontological Resources: Under this Alternative, approximately 621 acres would be graded or disturbed, including 92 acres of the Montecito sub-project site and 529 acres of the Sycamore Estates sub-project site. Because less area of the sites would be graded, the potential for significant impacts to paleontological resources would be reduced for this Alternative and mitigation would be required as specified in Section 4.10 of this EIR to mitigate direct impacts to below a level of significance. As with the proposed Project, significant and unmitigable cumulative impacts would occur under this Alternative.

Public Services: As with the proposed Project, public services such as police, fire, solid waste disposal and libraries would be available to service development on the project site. Because the same number of residential units would occur on the Montecito sub-project site under this Alternative, public service impacts would be the same as would occur under the proposed Project. Development under this Alternative represents a reduction of 489 residential units as compared to the proposed Sycamore Estates sub-project. Impacts to schools and parks would be mitigated through payment of fees, as no school or public park site would occur within the boundaries of the project site under this Alternative. Water and sewer service demand and solid waste disposal volumes would be increased on the Sycamore Estates sub-project site due to the development of industrial uses. As with the proposed Project, public service impacts would be mitigated to below a level of significance, with the exception of cumulative impacts to landfill capacity which would be significant and unmitigable.

Public Safety: Several SDG&E utility easements traverse the project site. Residents and employees located in close proximity to overhead electrical distribution lines would be exposed to electromagnetic fields (EMF), similar to the proposed project. Because health effects of EMF exposure are inconclusive and speculative in nature, impacts are not regarded as significant. No hazardous materials exist on the Montecito sub-project site, so no public safety impacts associated with hazardous materials would occur. Several hazardous materials, located in five existing industrial use areas on the Sycamore Estates sub-project site, would remain on the property. In addition, manufacturing/industrial uses that would occur over an approximate 222-acre area of the Sycamore Estates sub-project site under this Alternative would likely use, store and/or generate materials which are considered hazardous under State and Federal regulations. Because residential uses would occur in relatively close proximity to the manufacturing uses, potentially significant public safety impacts could occur. Also, truck traffic associated with the manufacturing/industrial uses would potentially increase conflicts (versus the proposed Project) with pedestrian and bicycle users in the project site and along Beeler Canyon Road. It is assumed that mitigation measures, such as a restriction on the use of hazardous chemicals and explosives, would mitigate increased public safety impacts, and that potential truck traffic conflicts could be mitigated through project design and road use load

restrictions. As with the proposed project, significant public safety impacts could be mitigated to below a level of significance.

Water Conservation: Because the same number of residential units would occur on the Montecito sub-project site as compared to the proposed Project, water conservation impacts would not be different than the proposed Project. Because industrial uses consume more water than residential uses, Sycamore Estates' water demand would be increased as compared to the proposed Project. Water demand for manufacturing/industrial uses is calculated at 6,250 gallons per acre per day (gal/ac/day); thus, development of 222 acres of industrial uses and 174 residential units on the Sycamore Estates sub-project site would increase water demand from 435,206 gal/ac/day as proposed by the Project, to approximately 1.9 million gal/ac/day. This increase in water demand would require on-site water storage, and would be regarded as a significant increase in water usage. As with the proposed project, direct impacts could be mitigated to below a level of significance, but cumulative water conservation impacts would remain significant and unmitigable.

Natural Resources: Implementation of the No Project – Existing Zoning Alternative, as well as the proposed Project, would preclude future use of the site for agricultural use and mineral resource extraction. The preclusion of agricultural uses would not be regarded as significant due to the site's poor agricultural soil quality. The preclusion of mining would be regarded as cumulatively significant due to the limited supply of aggregate resources and reserves located in the San Diego Production-Consumption Region. This impact would be similar to the proposed Project.

Cumulative Impacts: The No Project – Existing Zoning Alternative would increase the Project's contribution to cumulatively significant and unmitigatable impacts associated with transportation, visual quality, water quality, air quality, and water conservation and reduce the Project's contribution to cumulative biological resources, paleontological resources, and landform alteration impacts.

9.2.3 SUMMARY OF ENVIRONMENTAL ANALYSIS OF THE NO PROJECT – EXISTING ZONING ALTERNATIVE

The proposed Project's land use impact regarding inconsistency with the Industrial Element of the Progress Guide and General Plan would be avoided by the selection of this Alternative. Impacts to cultural resources would be avoided and impacts to natural resources, public services (police and fire protection), and public safety would be the same as would occur under the proposed Project. Compared to the proposed Project, the No Project – Existing Zoning Alternative would decrease the severity of impacts associated with landform alteration, erosion, biology, paleontological resources, and public services (schools, parks, and libraries) and increase the severity of impacts associated with visual quality, water quality, traffic, noise, and public services (landfill capacity, water service and sewer service).

9.3 NO PROJECT – MINERAL RESOURCE EXTRACTION ALTERNATIVE

As discussed in Section 4.14, NATURAL RESOURCES, the Conservation Element of the City's Progress Guide and General Plan identifies the project site as containing Poway Conglomerate which is described as a local source of sand, gravel, road base material and aggregate for asphaltic concrete. The No Project – Resource Extraction Alternative considers development of the Montecito sub-project site similar to that as described above under Section 9.2, NO PROJECT – EXISTING ZONING ALTERNATIVE, while allowing for an aggregate mining operation on the Sycamore Estates sub-project site. The purpose of this Alternative is to eliminate the significant cumulative natural resource impact of the proposed Project, which would preclude mining of the site. Necessary discretionary actions would include a Planned Development Permit (PDP) for the Montecito sub-project and a Conditional Use Permit (CUP) for mining of the Sycamore Estates sub-project site. Similar to the proposed Project, this Alternative would be inconsistent with RPO due to wetland impacts, requiring RPO deviation findings. In addition, the encroachment allowances for steep slopes would be exceeded on both the Montecito and Sycamore Estates sub-project sites, requiring the approval of RPO alternative compliance findings. Each sub-project would be required to obtain an individual RPO permit under this Alternative. Implementation of this Alternative also would require approval of a Reclamation Plan by the State Department of Conservation, Division of Mines and Geology. Separate state and federal permits would be issued for each of the two sub-projects so that they could proceed independently. Such permits would include 401 Regional Water Quality Board Certifications, U.S. Army Corps of Engineers (ACOE) Section 404 Permits for impacts to wetland habitat, and Section 1603 Streambed Alteration Agreements with the California Department of Fish and Game (CDFG).

9.3.1 DESCRIPTION OF THE NO PROJECT – RESOURCE EXTRACTION ALTERNATIVE

As conceptually shown in Figure 9-2, *No Project – Resource Extraction Alternative*, the Montecito sub-project site would be developed with 278 single-family residential lots and the western portion of the Sycamore Estates sub-project site would be mined for aggregate resources, as described below. Approximately 970 acres of the site would be graded or disturbed. Compared to the proposed Project, this Alternative represents a reduction of 664 residential units, the introduction of aggregate mining to the site, and an increase of approximately 227 acres of graded area. A description of the land uses that would occur under the No Project – Resource Extraction Alternative by sub-project site is described below.

Montecito Sub-Project

Under this Alternative, the Montecito sub-project site would be developed as described above in Section 9.2, NO PROJECT – EXISTING ZONING ALTERNATIVE, except that the development footprint would be pulled back away from the mining edge and would be slightly expanded in the southwestern portion of the property. No encroachment into the existing MHPA would occur.

Sycamore Estates Sub-Project

This Alternative considers the establishment of a resource extraction operation on approximately 867.5 847.5 acres of the Sycamore Estates sub-project site. Prior to the initiation of mining activity, a Reclamation Plan is required to be prepared in accordance with the Surface Mining and Reclamation Act of 1975 (SMARA). Because ultimate use of the site would be speculative, this Alternative only evaluates potential impacts of the mining operation. It should be noted, however, that at the completion of mining activities it would be likely that development of an end use would occur on the site.

For the purposes of analysis for this Alternative, it is assumed that the mining operation would consist of one large quarry, process plant operations, and an asphalt or concrete batch plant, as well as office and maintenance buildings. It also is assumed that mining, material processing and batching activities would disturb approximately 250 acres at any given time, over a period of approximately 75 years. Based on the size of the mining area and a 75-year time-frame, approximately 10,000 cubic yards of material would be exported daily.

Aggregate products would be mined in a phased manner to remove and process for production a variety of construction grade aggregate materials (sand and gravel). The quarry would be excavated to a depth of approximately 400 feet, with material mined by heavy equipment and transported by off-road dump haul trucks to stockpile areas and a processing plant. The quarry slopes would either be excavated in a benched method, or may be mined vertically with the slope reduced by drag line or bulldozer to achieve a 2:1 ultimate slope. The sand and gravel mining operations would not require the use of water to extract the resources. Distribution of rock would occur by conveying finished rock products and sand products to bunkers or stockpiles. Fluctuations would occur in the amount of stockpiled material depending upon market demand for the various products. Commercial trucks would enter the processing area to load products for delivery to the ultimate end-user within the market area.

Reclamation would be conducted to comply with reclamation standards required by SMARA. Reclamation of the site would be undertaken in phases, occurring as each mining phase is completed. As portions of the site are mined to finished grade, reclamation and revegetation of the slopes and subsequent development of the site would be undertaken.

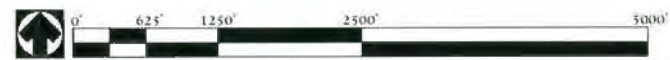
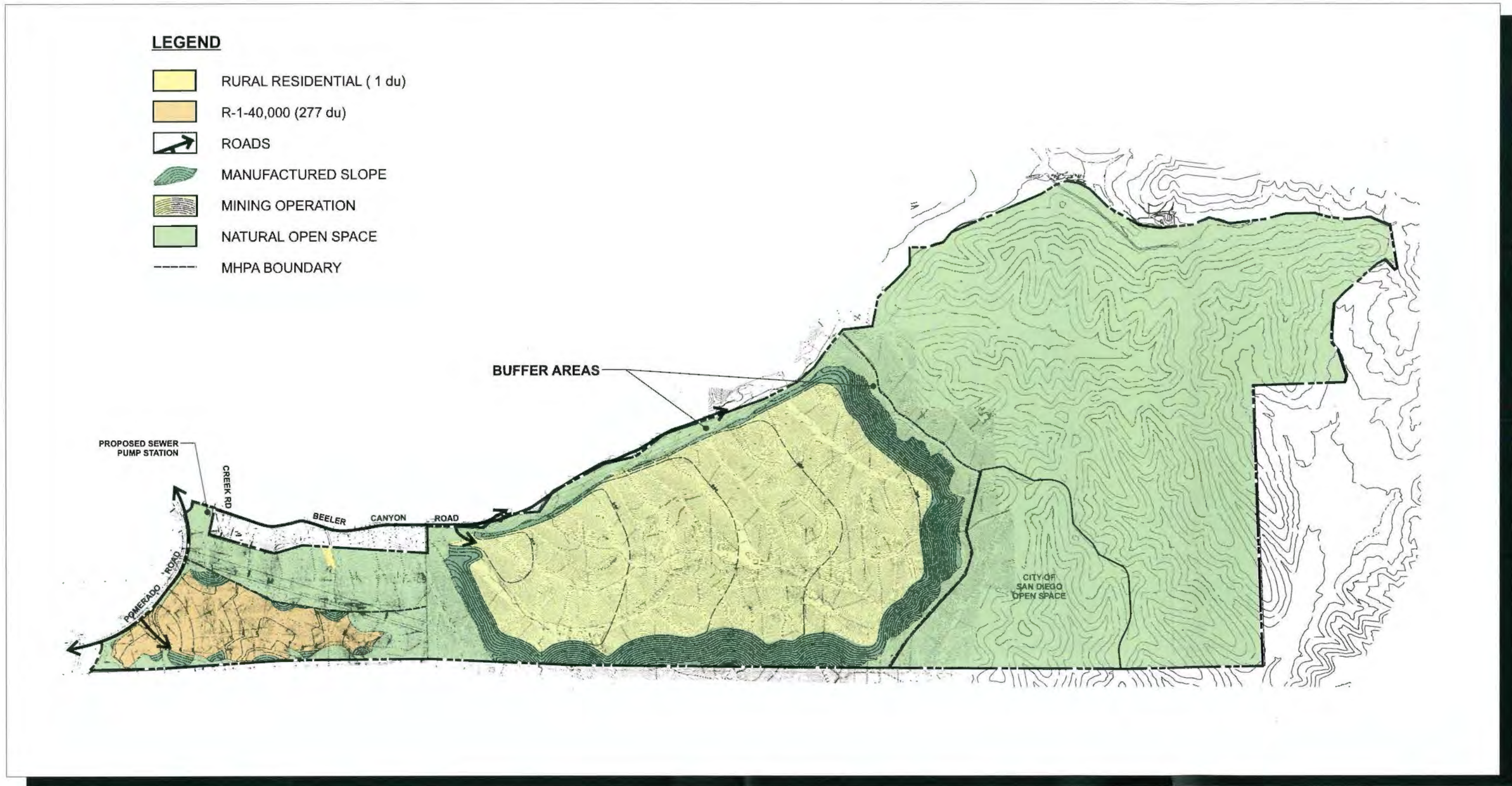


Figure 9-2
NO PROJECT -
MINERAL RESOURCE EXTRACTION ALTERNATIVE

9.3.2 ENVIRONMENTAL ANALYSIS OF THE NO PROJECT – RESOURCE EXTRACTION ALTERNATIVE

Land Use: This Alternative would eliminate the proposed Project's land use impact related to inconsistency with the Industrial Element. The Montecito and Sycamore Estates sub-projects would be inconsistent with RPO due to disturbance of wetlands and steep hillsides and wetland deviation and alternative compliance findings would be necessary. Each sub-project would be required to obtain an individual RPO permit under this Alternative.

Conflicts with the land use adjacency guidelines of the City's MSCP would likely occur due to noise, dust, and runoff/water quality pollution typically associated with aggregate mining uses; these impacts, however, would be mitigated and a development buffer would be provided. Internal land use conflicts also could potentially occur due to the placement of a large mining operation immediately adjacent to proposed residential areas. Noise, dust/air quality, public safety, and other nuisance impacts are common at mining/residential land use edges. These significant impacts, though greater than compared to the proposed Project, would be avoided through implementation of a buffer or setback and inclusion of typical mineral extraction safety measures. In addition, heavy truck traffic and associated vehicular noise and air quality impacts typically associated with resource extraction would circulate on Beeler Canyon Road, which provides access to several existing rural residential lots. The circulation of truck traffic through existing residential areas along Beeler Road would be regarded as a significant land use compatibility impact. This impact could be partially mitigated through implementation of truck traffic and route restrictions.

Visual Quality/Landform Alteration: Approximately 122.5 acres of the Montecito sub-project site would be graded for residential uses and approximately 847.5 acres of the Sycamore Estates sub-project site would be disturbed by a mining operation. As conceptually shown on Figure 9-2, the 847.5-acre disturbance area on Sycamore Estates would include a large, gently sloping quarry surrounded by manufactured slopes reaching heights of 250 feet or more, which would be a more significant landform alteration impact than would occur under the proposed Project. As compared to the proposed Project, 30.5 less acres would be graded on Montecito and 257.5 additional acres would be disturbed on Sycamore Estates. On the Montecito sub-project site, several gently sloping residential pads would be created south of the MHPA. Overall, landform alteration impacts would be reduced on the Montecito sub-project site as compared to the proposed Project. On the Sycamore Estates sub-project site, substantial landform alteration impacts would result from mining. Landform alteration impacts would be significant and would be partially mitigated through the implementation of contour grading, to the extent feasible, and slope revegetation.

Implementation of the No Project – Resource Extraction Alternative would change the visual appearance of the project site from an undeveloped property to that of a residential neighborhood in the western portion of the site, and large-scale mining operation interior to the project site. Open space would be retained in the northern portion of the Montecito sub-project site and in the eastern portion of the Sycamore Estates sub-project site. Visual quality impacts due to the creation of a monotonous development pattern would be decreased as viewed from

Scripps Poway Parkway and Kirkham way because the development area would occur south of the on-site SDG&E easement and the site's higher elevations in the northern portion of the property would be preserved as open space. From Pomerado Road, visual quality impacts would be the same as would occur with the proposed Project. Mining activity on 847.5 acres of Sycamore Estates would have a substantially adverse visual impact because implementation of this Alternative would result in a transformation of the site from a largely natural view to a view of mining activity characterized by large expanses of unvegetated land being continually lowered in elevation through resource extraction. This visual impact would be lessened over time by the use of contour grading to the extent feasible and the revegetation of slopes on a phased basis. Also, as mining extraction continued, the topographic elevation of portions of the operation would be reduced in a manner that would alleviate visibility from Pomerado Road and Scripps Poway Parkway. Visual quality impacts would be direct and cumulatively significant and unmitigated.

Biological Resources: Biological resource impacts on the Montecito sub-project site would resources be slightly reduced (by 30.5 acres) as compared to the proposed Project and would be increased on the Sycamore Estates sub-project site because the disturbance area would be increased by approximately 257.5 acres. The following impacts to vegetation communities would occur:

Vegetation Community	Montecito Sub-Project Site	Sycamore Estates Sub-Project Site
Oak Woodland	--	0.1
Native Grassland	--	4.4
Diegan Coastal Sage Scrub (& disturbed)	36.2	197.3
Southern Mixed Chaparral (& disturbed)	35.0	368.5
Chamise Chaparral (& disturbed)	47.5	205.3
Non-Native Grassland	3.3	4.9
Developed/Disturbed Habitat	0.5	67.0
Totals	122.5	847.5

No MHPA encroachment would occur; however, the conduct of aggregate mining activity adjacent to the MHPA would potentially result in inconsistencies with the MSCP's land use adjacency guidelines with regard to noise and dust. Impacts from inconsistency with the MSCP land use adjacency guidelines could be mitigated with the implementation of appropriate buffers and lighting and noise standards as mitigation.

Geology and Soils: Disturbance would be increased on the Sycamore Estates sub-project site by 257.5 acres and would be decreased on the Montecito sub-project site by 30.5, as compared to the proposed Project. Existence of a mining operation would involve substantial ground

disturbance and would expose soils to erosion potential for extended time periods. Significant erosional impacts associated with this Alternative would be greatly increased as compared to the proposed Project on the Sycamore Estates sub-project site. These impacts would be mitigated through Best Management Practices applied by RWQCB requirements.

Hydrology/Water Quality: Total water usage likely would be less under this Alternative as compared to the proposed Project. Urban pollutant impacts from the Montecito sub-project would be similar to that of the proposed Project, as the same number of dwelling units would occur on a slightly reduced disturbance area. Water quality problems are very typical in mining operations. The mining operation on the Sycamore Estates sub-project site would potentially increase erosional impacts dramatically as compared to the proposed Project. The mining operator would, however, be required to maintain a Stormwater Discharge Pollution Prevention and Monitoring Plan, which would reduce potential impacts to water quality. As with the proposed Project, direct impacts to hydrology/water quality would be mitigated, but cumulative impacts would remain significant.

Transportation: Approximately 2,770 ADT would be generated by the Montecito sub-project under either the proposed Project or this Alternative, because the number of dwelling units would be unchanged. Because Montecito's primary access would be from Pomerado Road, trip distribution under this Alternative also would be the same as the proposed Project for the Montecito sub-project.

Implementation of this Alternative would result in reduced traffic generation as compared to the proposed Project on the Sycamore Estates sub-project site. Traffic would consist of employee and visitor passenger car trips and mining-related truck trips, with mining-related vehicles using Beeler Canyon Road. Although direct and cumulative traffic impacts would be decreased, traffic conflicts would likely occur between residential trips and aggregate mining haul vehicles. With mining activities occurring over an approximate 75-year period, the export of approximately 10,000 cubic yards of material daily would amount to approximately 540 daily haul trips over a 6-hour period. Vehicle conflicts with pedestrians and bicyclists also may occur. These impacts would be mitigatable through implementation of minor design modifications and/or limitations placed on truck routing.

Noise: With the introduction of mining activity on the Sycamore Estates sub-project site, vehicular noise impacts would occur along Beeler Canyon Road, potentially requiring the construction of noise attenuation walls where the roadway would abut residential uses. Detached residential homes proposed adjacent to Rancho Encantada Parkway and other impacted roadways would be required to be constructed with architectural components that attain a 45 dB CNEL interior noise level. Mining also generates significant noise due to blasting and rock crushing. These noise levels would result in significant stationary noise impacts, which would potentially impact nearby residential uses. Noise impacts resulting from increased truck traffic would be mitigated through implementation of sound attenuation devices, including walls, insulation and upgraded windows, for example. Blasting noise could

be partially mitigated through restrictions on blasting times with regard to duration and time of day.

Air Quality: Short-term fugitive dust (PM-10) impacts would be significantly increased as compared to the proposed Project because more land area would be disturbed for a long period of time (75 years or more). If an aggregate batch plant or concrete batch plant is located on the mining site, they would be required to obtain air quality permits from the South Coast Air Quality Management District (SCAQMD) for stationary source emissions.

Cultural Resources: No important or significant cultural resources are located on the Montecito sub-project. One potentially significant cultural resource is located on the Sycamore Estates site, and mitigation would be implemented as disclosed in Section 4.9 to reduce impacts to this site to below a level of significance.

Paleontological Resources: Because more area of the site would be graded, the potential for impacts to paleontological resources would be increased as compared to the proposed Project and mitigation would be required. As with the proposed Project, cumulative impacts would be significant and unmitigable.

Public Services: As with the proposed Project, public services such as police, fire, solid waste disposal and libraries would be available to service development on the Montecito sub-project site. Because the same number of residential units would occur on the Montecito sub-project site under this Alternative, public service impacts would be the same as would occur under the proposed Project. Payment of school and park fees would be necessary to reduce impacts to below a level of significance because a school/park site would not occur on the adjacent Sycamore Estates sub-project site.

Because no residential uses would be located on the Sycamore Estates sub-project site, impacts to schools, parks and libraries would not occur. Sewer service demand would be decreased on the Sycamore Estates sub-project site, and substantial water usage would occur, as it is a necessary component of a typical mining operation for operation and dust control. Although substantial, water usage would be similar to or slightly reduced as compared to the proposed Project. As with the proposed Project, impacts to public services would be reduced to below a level of significance, with the exception of cumulative landfill capacity impacts which would be significant and unmitigable.

Public Safety: Residents and employees located in close proximity to overhead electrical distribution lines would be exposed to electromagnetic fields (EMF) but because health effects of EMF exposure are inconclusive and speculative in nature, impacts are not regarded as significant. Several hazardous materials, located in five existing industrial use areas on the Sycamore Estates sub-project site, would be removed from the property during the course of mining activity. The mining operation would likely use, store and/or generate materials which are considered hazardous under State and Federal regulations. The mining operator would be required to prepare a Business Emergency, Hazard Communication and Training Plan and

permits would be required for material discharging, hazardous material generation and hazardous material handling. Also, because residential uses would occur in relatively close proximity to the mining operation, potentially significant public safety impacts could occur as well. Potential impacts from use of hazardous materials would be mitigated through required storage and use restrictions. Potential public safety issues related to increase traffic conflicts and noise, dust, etc., would be mitigated through minor design modifications and/or appropriate mitigation restricting truck traffic flow and dust control. Public outreach programs, as our customarily employed in the industry, also could be implemented. As with the proposed Project, public safety impacts would be reduced to below a level of significance

Water Conservation: Because the same number of residential units would occur on the Montecito sub-project site as compared to the proposed Project, water conservation impacts would not be different than the Project proposal. However, sand and gravel mining operations on the Sycamore Estates sub-project site would not require the use of water to extract the resources. Water is used for dust control and other miscellaneous uses, however. Water demand for the project as a whole would be less than as compared to the proposed Project. As with the proposed Project, direct impacts would be mitigated to below a level of significance but cumulative impacts would be unmitigable.

Natural Resources: Implementation of the No Project – Resource Extraction Alternative would preclude future use of the site for agricultural use. The preclusion of agricultural uses would not be regarded as significant due to the site’s poor agricultural soil quality. The conduct of mining would be regarded as a positive impact to the supply of aggregate resources and reserves located in the San Diego Production-Consumption Region. The significant cumulative impact caused by the proposed Project with regard to precluding the site from future resource extraction would be eliminated by this Alternative.

Cumulative Impacts: The No Project – Resource Extraction Alternative would increase the Project’s contribution to significant and unmitigable cumulative impacts associated with landform alteration/visual quality, water quality, and air quality, but reduce cumulative impacts to water conservation and public services and eliminate cumulative impacts to natural resources.

9.3.3 SUMMARY OF ENVIRONMENTAL ANALYSIS OF THE NO PROJECT - RESOURCE EXTRACTION ALTERNATIVE

The proposed Project’s land use impact and natural resource impact caused by precluding future use of the site for resource extraction would be avoided by the selection of this Alternative. Impacts associated with public services, traffic, and water conservation would be less under this Alternative. Impacts to cultural resources would be the same as would occur under the proposed project. Compared to the proposed Project, the No Project – Resource Extraction Alternative would increase impacts associated with landform alteration/visual quality, erosion, water quality, biology, noise, air quality, paleontological resources, and public safety. Direct impacts to hydrology/water quality, biology, noise, paleontological resources and public safety would be mitigable. Cumulative landform alteration/visual

quality, loss of non-native grassland (raptor foraging habitat), air quality, water quality, paleontological resources, landfill capacity, and water conservation would remain significant and unmitigated.

9.4 REDUCED PROJECT ALTERNATIVE

9.4.1 DESCRIPTION OF THE REDUCED PROJECT ALTERNATIVE

The Reduced Project Alternative considers reducing the development footprint of the proposed Project, primarily to reduce impacts to landform alteration and biological resources (see Figure 9-3, *Reduced Project Alternative*). Necessary discretionary actions would include a Precise Plan, as well as PRDs and VTMs for each of the sub-projects. In addition, separate state and federal permits for each of the two sub-projects would be necessary, including 401 Regional Water Quality Board Certifications, U.S. Army Corps of Engineers (ACOE) Section 404 Permits for impacts to wetland habitat, and Section 1603 Streambed Alteration Agreements with the California Department of Fish and Game (CDFG).

Montecito Sub-Project

The Montecito sub-project site would be developed with the same number of residential units as proposed by the Project, but would impact less of the site by clustering development into one smaller, more compact planning area located adjacent to Pomerado Road. In total, 277 units would be constructed on a development pad of approximately 36 net acres. Residential product type could include apartments, townhomes, condominiums, or small lot detached units (average density: 8.1 du/ac). The one existing single-family residence would be retained in its existing location. Rancho Encantada Parkway would not be constructed through the Montecito sub-project site. Approximately 50.9 acres of the sub-project site would be graded under this Alternative.

Sycamore Estates Sub-Project

The Sycamore Estates sub-project site would be rezoned to AR-1-1 (formerly A-1-10), as proposed by the Project, but its development footprint and residential unit count would be reduced. Under this Alternative, 481 residential units would be constructed on the site, including 404 single-family units and 77 affordable housing units (average density: 4.4 du/ac). A 16-acre school park site would also occur in a similar fashion as proposed by the Project. Access would be provided via a loop road, with two main access points on Beeler Canyon Road. Approximately 349.8 acres of the sub-project site would be graded under this Alternative.

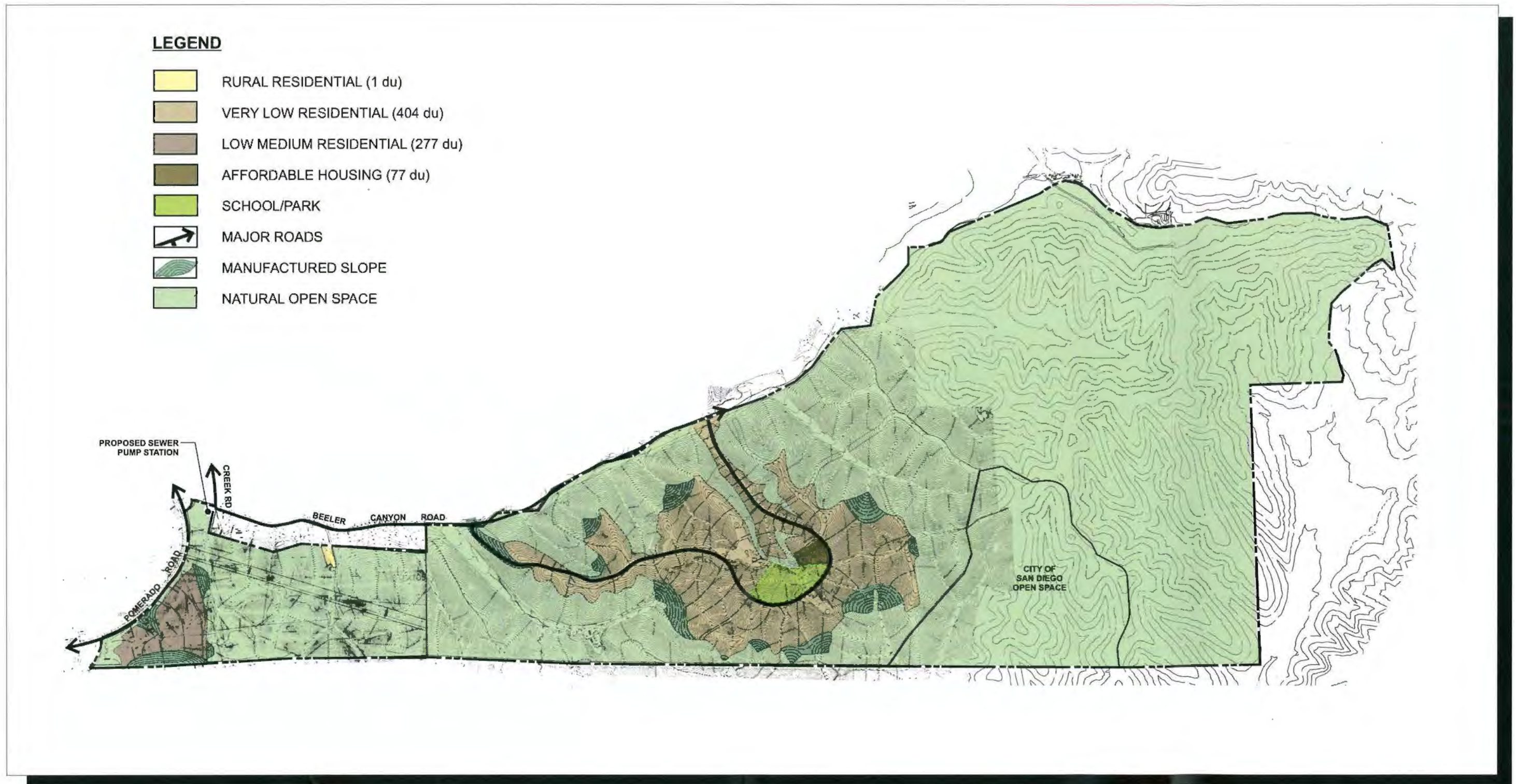


Figure 9-3
REDUCED PROJECT ALTERNATIVE



9.4.2 ENVIRONMENTAL ANALYSIS OF THE REDUCED PROJECT ALTERNATIVE

Land Use: The Reduced Project Alternative would be consistent with a majority of the environmental goals, objectives, and recommendations of the Progress Guide and General Plan. Similar to the proposed Project, consistency with Council Policy 600-40 would be assured with adherence to the required development suitability analysis. The Alternative would result in the construction of fewer single-family and multi-family affordable residential units as compared to the proposed Project. An MHPA boundary adjustment would not be required under this Alternative because no encroachment into the MHPA would occur. The increased amount of MHPA on-site with the proposed Project would not be realized with this Alternative. However, 342.3 acres of added open space would be provided as compared to the proposed Project. With implementation of lighting, fencing, and urban runoff filtering, this Alternative would be consistent with the MHPA Adjacency Guidelines. Similar to the proposed Project, this Alternative would not propose a phase shift via a citywide vote per the Managed Growth Initiative, but instead would propose development in accordance with Council Policy 600-29. In conclusion, the Reduced Project Alternative would be preferable to the proposed Project from a land use standpoint, because it would still provide for an affordable housing component while preserving 342.3 additional acres of open space.

Landform Alteration/Visual Quality: Approximately 50.9 acres of the Montecito sub-project site and 349.8 acres of the Sycamore Estates sub-project site would be graded. Because less land area would be graded under this Alternative (a 342.3-acre reduction) as compared to the proposed Project, landform alteration impacts would be reduced, but not avoided, particularly on the Montecito sub-project site where a majority of the sites ridge and canyon formation would be preserved as open space. Landform alteration impacts would still be significant and unmitigable due to grading quantities exceeding the City’s significance threshold of 2,000 cubic yards per graded acre and the creation of manufactured slopes over 10 feet in height. Implementation of the Reduced Project Alternative would change the visual appearance of the project site from an undeveloped property to that of two distinct residential areas surrounded by open space. The development of the site under this Alternative would reduce direct and cumulative landform alteration/visual quality impacts, but not to below a level of significance.

Biological Resources: Implementation of this Alternative would reduce impacts to biological resources over that which would occur with implementation of the proposed Project because the disturbance area would be reduced by approximately 342.3 acres. Under the Reduced Project Alternative, the following impacts to vegetation communities would occur:

Vegetation Community	Montecito Sub-Project Site	Sycamore Estates Sub-Project Site
Native Grassland	--	3.0
Diegan Coastal Sage Scrub (& disturbed)	14.5	82.1
Southern Mixed Chaparral (& disturbed)	13.5	128.2
Chamise Chaparral (& disturbed)	17.8	89.0

Non-Native Grassland	3.0	2.0
Developed/Disturbed Habitat	2.1	45.1
Totals	50.9	349.8

In addition, off-site impacts to biological resources along Beeler Canyon Road would occur because the roadway would be widened to accommodate the increase in traffic generated by the Sycamore Estates sub-project. Impacts to natural flood channel would be lessened on the Sycamore Estates sub-project site. Impacts to long-term conservation of biological resources would be avoided because no encroachment into the MHPA would occur. Impacts to biological resources remain significant and mitigable with this Alternative.

Geology/Soils: Because less area of the site would be graded under this Alternative, erosion impacts associated with grading and construction would be reduced as compared to the proposed project. The impact would remain significant and mitigated with this Alternative.

Hydrology/Water Quality: Cumulative water quality impacts associated with urban pollutants would be reduced as compared to the Project because a reduced amount of impervious surfaces would occur on the property. Impacts related to erosion would also be decreased under this Alternative because less acreage would be graded. Overall, water quality impacts with this Alternative would remain significant but mitigable. Similar to the proposed Project, cumulative water quality impacts would remain significant and unmitigable.

Transportation: Overall traffic would be significantly reduced under this Alternative, as compared to the proposed Project. Total average daily trips for this Alternative would be 7,792 ADT compared to 10, 558 ADT for the proposed Project.

Approximately 2,770 ADT would be generated by the Montecito sub-project under the proposed Project, compared to 2,216 ADT for this Alternative, because the proposed Project would develop single family detached housing which generates about 10 ADT per unit, while the attached units proposed under this Alternative would generate about 8 ADT per unit. Applying trip generation rates of 10 ADT per single-family unit, 8 ADT per multi-family unit and 50 ADT and 60 ADT per net park and school acreage, respectively, a total of approximately 5,576 ADT would be generated by the Sycamore Estates sub-project under this Alternative. This represents a reduction of 2,212 ADT as compared to the proposed Project. Impacts to the following would be reduced, but not to below a level of significance: a) the westbound to southbound freeway on-ramp at Pomerado Road/I-15; b) the merging distance on Pomerado Road to the east of the I-15 northbound off-ramp; c) off-ramp storage at the Pomerado Road/I-15 northbound off-ramp; d) Pomerado Road street segments; and e) three Pomerado Road intersections: Scripps Poway Parkway, Willow Creek, and Scripps Ranch Boulevard.

Because less ADT would be generated under this Alternative as compared to the proposed Project, cumulative traffic impacts would be decreased, but not to below a level of significance.

All of the sub-project's traffic would use Beeler Canyon Road as sole ingress/egress to the project site. Beeler Canyon Road also would be the sole access route to the school and park sites, which would generate additional external traffic. Improvements to Beeler Canyon Road would thus be necessary to upgrade its designation to a Residential Collector. Significant direct traffic impacts would occur at the intersection of Creek Road/Pomerado Road, and intersection improvements would be required to reduce this impact to below a level of significance.

Noise: Vehicular noise impacts on Pomerado Road would require the construction of a noise wall on the Montecito sub-project site between the roadway and adjacent homes if homes are proposed within 200 feet of the roadway centerline, similar to the proposed project. Vehicular noise would increase along Beeler Canyon Road, but not to the point where existing residences abutting the roadway would be significantly impacted. Overall, fewer noise impacts are expected under this alternative as compared to the proposed Project. Under both this Alternative and the proposed Project, noise impacts would be mitigated to below a level of significance.

Air Quality: Short-term fugitive dust (PM-10) impacts generated during construction would be reduced under this Alternative, because less land area would be disturbed and the amount of grading would be reduced. As with the proposed Project, the contribution to the San Diego region's current inability to meet air quality standards would be considered a cumulatively significant impact with this Alternative.

Cultural Resources: No important cultural resources are located on the Montecito sub-project site. The significant direct, but mitigable, direct cultural resource impact on the Sycamore Estates sub-project site would be avoided under this Alternative, because the area containing the potentially significant cultural resource site would be preserved as open space.

Paleontological Resources: Because less area of the site would be graded (a 342.3-acre reduction), the potential for impacts to paleontological resources would be reduced, but not avoided. Thus, the direct impact would remain significant and mitigable with this Alternative. Under both the proposed Project and this alternative, the cumulative paleontological resource impact would remain significant and unmitigable.

Public Services: As with the proposed Project, public services such as police, fire, solid waste disposal and libraries would be available to service development on the project site. Because the same number of residential units would occur on the Montecito sub-project sites under this Alternative, public service impacts would be the same as would occur under the proposed Project. It should be noted, however, that because Rancho Encantada Parkway would not be constructed under this Alternative to connect the Montecito and Sycamore Estates sub-projects, residents of Montecito would have to travel approximately two (2.0) road miles to reach the school and park sites located on Sycamore Estates. The Recreation Element of the City's Progress Guide and General Plan states that neighborhood parks should be within a ½-mile radius to areas it serves. This inconsistency with the Recreation Element would be regarded as

an adverse, but not significant impact of this Alternative. Because Beeler Canyon Road would serve as the sole access route to the Sycamore Estates sub-project site, a potentially significant fire services impact would occur because a secondary access route would not be available in the case of an emergency. To mitigate this impact, fire sprinklers would be required to be installed in each habitable structure. Water, sewer, and solid waste disposal impacts would be lessened for the Sycamore Estates sub-project because a fewer number of residential units would be developed. As with the proposed project, public facilities impacts would be mitigated to below a level of significance, with the exception of cumulative landfill capacity impacts which would be significant and unmitigable.

Public Safety: Residents located in close proximity to overhead electrical distribution lines would be exposed to electromagnetic fields (EMF). Because health effects of EMF exposure are inconclusive and speculative in nature, impacts are not regarded as significant. No hazardous materials exist on the Montecito sub-project site, so no public safety impacts associated with hazardous materials would occur. Hazardous materials located on the Sycamore Estates sub-project site would be removed or remediated with implementation of development, and mitigation would be required similar to that proposed by the Project. These effects are consistent with those identified for the proposed project.

Water Conservation: Because with this Alternative the same number of residential units would occur on the Montecito sub-project and about 82 fewer units would be constructed on the Sycamore Estates sub-project site as compared to the proposed Project, water conservation impacts would be reduced but not substantially different than the Project proposal. Less landscaping would be established, however, which would require less irrigation and would account for some reduction in water usage. Reductions in water usage would occur on the Sycamore Estates sub-project site because 82 fewer residential units would be constructed. As with the proposed Project, direct impacts could be mitigated to below a level of significance, but cumulative water conservation impacts would remain significant and unmitigable.

Natural Resources: Implementation of the Reduced Project Alternative would preclude future use of the site for agricultural use and mineral resource extraction. The preclusion of agricultural uses would not be regarded as significant due to the site's poor agricultural soil quality. Similar to the proposed Project, the preclusion of mining would be regarded as a cumulatively significant impact for this Alternative, due to the limited supply of aggregate resources and reserves located in the San Diego Production-Consumption Region.

Cumulative Impacts: The Reduced Project Alternative as compared to the proposed Project would reduce cumulative impacts to biology, erosion, landform alteration/visual quality, water conservation, traffic and air quality and hydrology/water quality. This Alternative also would provide a reduction as compared to the Project's contribution to cumulative water quality impacts associated with urban pollutants because less impervious surface area would occur, generating less urban runoff. The cumulative impacts to landform alteration/visual quality, loss of non-native grassland, hydrology/water quality, air quality, paleontological resources, landfill

capacity, water conservation and mineral resources would be reduced, but would remain significant and unmitigable with this Alternative.

9.4.3 SUMMARY OF ENVIRONMENTAL ANALYSIS OF THE REDUCED PROJECT ALTERNATIVE

Compared to the proposed Project, the Reduced Project Alternative would decrease direct impacts associated with landform alteration/visual quality, erosion, hydrology/water quality, biology, traffic, noise, air quality, cultural resources, paleontological resources, public services and water conservation. Public safety and natural resources impacts would be the same as would occur under the proposed Project. Potentially significant off-site impacts would occur along Beeler Canyon Road, which would not occur under the proposed Project. Fire protection impacts would increase due to the provision of only one access to the Sycamore Estates sub-project site, and recreational resources impacts would be adverse, but not significant for Montecito, because the park on Sycamore Estates could not be accessed within ½-mile driving distance. This Alternative would provide less housing (both single-family and multi-family affordable) than the proposed Project. However, it would provide more overall open space. In conclusion, several impact reductions would occur with implementation of this Alternative. Impacts to public safety, natural resources, and cultural resources would be the same as under the proposed Project. Impacts to cumulative landform alteration/visual quality, loss of non-native grassland, hydrology/water quality, air quality, paleontological resources, landfill capacity, water conservation and mineral resources, although reduced, would remain significant and unmitigable. Off-site traffic and noise impacts along Beeler Canyon Road, fire protection impacts and impacts to recreational resources would be greater with this Alternative as compared to the proposed Project, but mitigable. Because the Reduced Project Alternative would more fully achieve the goal of locating development on the least environmentally sensitive portions of the site, and because it would have the fewest overall impacts, this Alternative is identified as the Environmentally Superior Alternative.

9.5 REDUCED GRADING ALTERNATIVE

9.5.1 DESCRIPTION OF THE REDUCED GRADING ALTERNATIVE

The Reduced Grading Alternative is intended to reduce, but not eliminate, landform alteration impacts due to manufactured slope creation and grading quantities. In general, the Montecito and Sycamore Estates sub-project sites would be developed with large, custom home sites. Rural, private roadways and driveways would occur internal to the project site to provide access to the lots. For purposes of this Alternative, it is assumed that several access points would be established with Beeler Canyon Road and one with Pomerado Road. Because the purpose of this Alternative is to reduce grading quantities, only one access is proposed at Pomerado Road. Rural residential areas, containing a total of 114 lots on the Montecito sub-project site and 429 lots on the Sycamore Estates sub-project site would be developed as custom homes, and limited grading is expected to occur outside of the structure footprints. For purposes of analysis of this Alternative, it is assumed that 50 percent of the lot area would be disturbed by grading and construction of the custom homes, and associated private yards and driveways as a worst case scenario. As shown on the typical detail in Figure 9-4, the actual graded area for each lot would be less than 50 percent of each lot, and likely even less than 25%. The owner of each lot would be responsible for selecting the location for placement of the building footprint. In

many cases, homes would likely be sited on the flattest portion of the lot, or would be built into the hillside. If sited near the rear of the lot, long, steep driveways may be necessary, as would the provision of culverts over drainages in some areas along the canyon bottoms. See Figure 9-4, *Reduced Grading Alternative* for a conceptual illustration of a lotting plan that could occur under this Alternative. The cross-hatch pattern depicted on the figure illustrates the areas to which lotting would be confined. As noted above, it has been assumed for this Alternative that up to 50 percent of this entire lotted area would be graded or disturbed by yards/custom home private use areas. As shown on the Typical Detail provided on Figure 9-4, the range of impact to each lot would vary. The 50 percent impact assumption has been chosen as a worse case scenario; however, based on topographic constraints it is likely that 25-30% of each lot would be impacted. If this Alternative were to be implemented, actual impacts would be assessed on a lot-by-lot basis at the time an application was made to develop each custom home site.

Montecito Sub-Project

Approximately 89.5 acres of the Montecito sub-project site is included in the MHPA that would be retained as open space, with the exception of one single-family residence that would be retained near the northern site boundary. The existing SDG&E easement also would be retained in its existing location. In addition to the one existing rural residential home located on the property, rural residential uses consisting of custom lot development of 114 homes would occur on up to 165.2 acres of the site, access to which would be provided by private driveways. Lot sizes would range from ½-acre to three acres, with the average lot size being approximately one-acre. Assuming that approximately 50 percent of each lot would be disturbed, including grading impacts resulting from the creation of roads and slopes to support roads, up to 75 acres of the Montecito sub-project site would be disturbed under this Alternative.

Sycamore Estates Sub-Project

The Sycamore Estates sub-project site would be rezoned to AR-1-1 (formerly A-1-10 under the City's pre-2000 Municipal Code), and developed under the provisions of the City's Rural Cluster Development Regulations. No encroachment into the existing MHPA would occur. Rural residential homes consisting of custom lot development would occur along Beeler Canyon Road at the site's northern boundary and throughout the site. In total, 429 rural residential lots would occur on the Sycamore Estates sub-project site. No affordable housing or school or park site would be provided on-site. Lot sizes would range from ½-acre to over 30 acres, with the average lot size being approximately 2½ acres. Assuming that up to 50 percent of each lot would be disturbed, including grading impacts resulting from the creation of roads and slopes to support roads, up to 458 acres of the Sycamore Estates sub-project site would be disturbed under this Alternative.

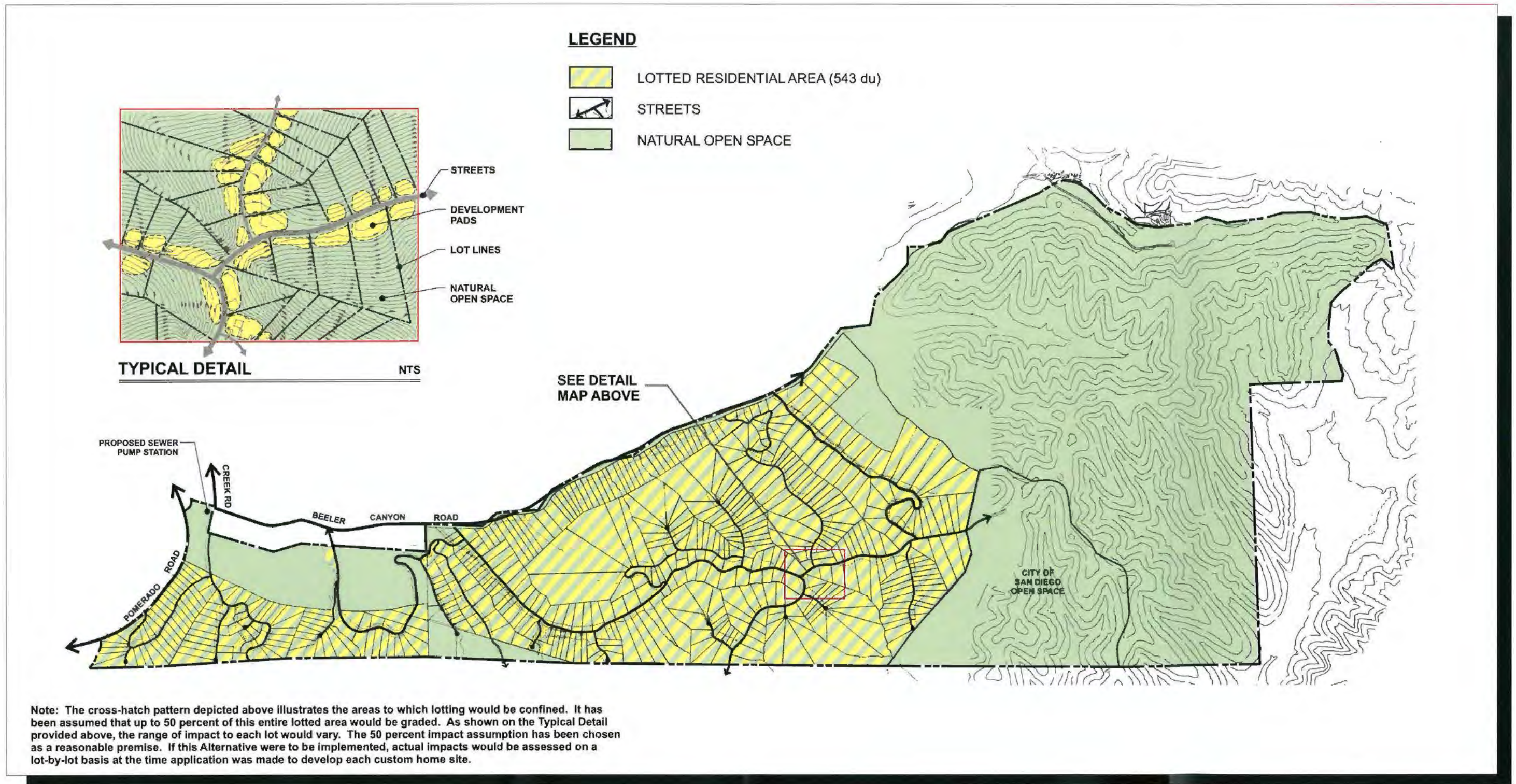
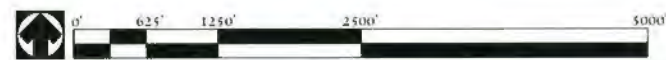


Figure 9-4
REDUCED GRADING ALTERNATIVE



9.5.2 ENVIRONMENTAL ANALYSIS OF THE REDUCED GRADING ALTERNATIVE

Land Use: The Reduced Grading Alternative would be consistent with a majority of the environmental goals, objectives, and recommendations of the Progress Guide and General Plan. Council Policy 600-40 would not apply because a Project long-range plan would not be prepared. Each sub-project would thus be subject to the Resource Protection Ordinance (RPO). Depending on the placement of each home on each individual lot, potentially significant impacts could occur to wetlands and steep slopes in excess of the RPO encroachment allowances, if individual projects proposed impacts to these resources. An MHPA boundary adjustment would not be required under this Alternative because no encroachment into the MHPA would occur. Total open space would be increased from 1,741.2 acres with the proposed Project to at least 1,877 acres. With implementation of appropriate lighting, fencing, and urban runoff filtering, this Alternative would be consistent with the MHPA Land Use Adjacency (LUA) Guidelines. From a land use standpoint, the Alternative would not be preferable to the proposed Project because homes would not be clustered. However, at least 130 acres of additional open space and the site's natural topography would be preserved. As with the proposed Project, a significant land use impact due to conflict with the Industrial Element of the General Plan would occur as a result of rezoning the Sycamore Estates sub-project site from Industrial to AR-1-1.

Landform Alteration/Visual Quality: Graded pads would occur sporadically throughout the site and large, flat development pads would not be created. Less land area would be graded under this Alternative, and less grading per-acre would occur because large lots and custom home development would require less grading than traditional subdivision development. Because each lot would be developed in a custom manner, it is not possible at this level of design to provide an estimate of grading quantities; but to reduce landform alteration impacts to below a level of significance, manufactured slopes would be limited to 10 feet in height and grading would be limited to no more than 2,000 cubic yards per graded acre. Or, contour grading, stepped pads and landscaping would be implemented to reduce direct impacts to landform alteration to below a level of significance. This alternative would eliminate the proposed Project's significant and unmitigable direct landform alteration impact. Cumulative landform alteration impacts would remain significant, but would be reduced as compared to the proposed Project.

Implementation of the Reduced Grading Alternative would change the visual appearance of the project site from an undeveloped property to that of residential uses homes spotted over the site and surrounded by open space. The development of the site under this Alternative would not block public views or have a substantially adverse visual impact; however, because the site's existing, largely undeveloped view would change to a view of custom lots over a majority of the site, significant, but reduced direct and cumulative visual quality impacts would remain. In sum, less overall grading would occur with implementation of this Alternative. This alternative would eliminate significant landform/alteration impacts and reduce impacts to visual quality.

Biological Resources: Because it would be speculative to assume the location of each custom home, this Alternative assumes that approximately 25 percent, and up to 50 percent of each lot, including roads and slopes required to support the development would be disturbed. Thus, up to 76 acres would be disturbed on Montecito and up to 498 acres would be disturbed on Sycamore Estates. It also may be assumed that indirect biological impacts would increase slightly, as open space would be distributed in smaller segments within each lot, and be more subject to intrusion from domestic animals and humans. As with the proposed Project, indirect impacts would be significant, but mitigable. Mitigation of upland habitat would occur through on-site preservation within the MHPA portions of both sub-project sites. Similar to the proposed Project, this Alternative would require impacts to biology in order to construct a sewer line to service the project. Impacts to long-term conservation of biological resources would be avoided because no encroachment into the MHPA would occur. The configuration of open space on-site with this Alternative would be less preferable to wildlife connectivity when compared to the proposed Project, although no significant impacts to wildlife movement would occur. This is especially true in Beeler Canyon where the proposed Project provides a much wider east-west wildlife corridor. With this Alternative, each lot could be fenced, thus reducing the width of the corridor. It may be assumed, however, that a minor design modification or mitigation would require establishment of a corridor as an open space easement along the edge of appropriate custom lots. Overall, the Reduced Grading Alternative would have fewer impacts to biological resources than the proposed Project. As with the proposed project, direct biological resource impacts would be significant, but mitigable, and the cumulative impact due to the loss of non-native grassland habitat would remain significant and unmitigable.

Geology/Soils: Because mass grading of the site would not occur, direct erosional impacts associated with the grading and construction would be reduced as compared to the proposed Project. Lot-specific Geologic Investigation Reports would be required for each custom lot to ensure that each home is constructed with appropriate excavation techniques, slope construction, foundation design, retaining walls, drainage provisions, etc. Prior to issuance of grading permits for each custom lot, the lot-specific geotechnical report would need to be approved by the City Planning Development Review Department. Potential impacts would be reduced, but would remain potentially significant and mitigable.

Hydrology/Water Quality: Under this Alternative, direct and cumulative water quality impacts associated with urban pollutants would be less because a reduced amount of impervious surfaces would be created on the property, substantially less grading and earth moving would be required and fewer manufactured slopes that require irrigation would be created. Direct impacts would be mitigable and substantially reduced as compared to the proposed Project. As with the proposed project, cumulative impacts would be reduced, but would remain significant and unmitigable.

Transportation: Applying trip generation rates of 10 ADT per single-family unit, 1,140 ADT would be generated by the Montecito sub-project and 4,290 ADT would be generated by the Sycamore Estates sub-project. This represents a reduction of 5,118 ADT as compared to the

proposed Project. Because less ADT would be generated, cumulative traffic impacts would be decreased, but not to below a level of significance. Because only one access point at Pomerado Road would occur under the Alternative, most traffic would use Beeler Canyon Road as ingress/egress to the project site. Improvements to Beeler Canyon Road would not be necessary. Significant direct traffic impacts would occur at the intersection of Creek Road/Pomerado Road, and intersection improvements would be required to reduce this impact to below a level of significance. Overall traffic impacts would be reduced with this Alternative as compared to the proposed Project.

Noise: Unlike the proposed Project, vehicular noise impacts would not require the construction of noise attenuation walls on the site. Vehicular noise would increase along Beeler Canyon Road, but not to the point where existing residences abutting the roadway would be significantly impacted. As with the proposed Project, the significant vehicular noise impacts of this Alternative would be reduced to below a level of significance.

Air Quality: Short-term fugitive dust (PM-10) impacts generated during construction would be reduced under this Alternative, because less land area would be disturbed and the amount of grading would be reduced. As with the proposed Project, the contribution to the San Diego region's current inability to meet air quality standards would be considered a cumulatively significant and unmitigable impact with this Alternative. Overall air quality impacts would be reduced with this Alternative as compared to the proposed Project.

Cultural Resources: No important cultural resources are located on the Montecito sub-project site. Eight cultural resources exist on the Sycamore Estates sub-project site, seven of which were found to be not important. The eighth site would be located in a single family lot under this Alternative, but would be preserved by a conservation easement. Thus, the significant but mitigable impact of the proposed Project would be avoided by this Alternative.

Paleontological Resources: Because less area of the site would be graded, the potential for impacts to paleontological resources would be reduced, but not avoided. Potentially significant direct impacts would remain significant and mitigable with the Alternative as compared to the proposed Project. Cumulative impacts would remain significant and unmitigable.

Public Services: As with the proposed Project, public services such as police, fire, solid waste disposal and libraries would be available to service development on the project site. Because 398 fewer residential units would be located on the site, public service demand would be reduced as compared to the proposed Project. Because a school and park site would not be provided under the Reduced Grading Alternative, the Montecito and Sycamore Estates sub-project applicants would be required to pay City park fees and enter into a mitigation agreement with the Poway Unified School District to mitigate impacts. Due to the circuitous private driveway system, fire sprinkler systems would be required to be installed in all homes located outside of the Fire Department's 6-minute response time. As with the proposed Project, public service impacts would be significant, although reduced, and mitigable, with the

exception of landfill capacity impacts which would remain cumulatively significant and unmitigable.

Public Safety: Residents located in close proximity to overhead electrical distribution lines would be exposed to electromagnetic fields (EMF). Because health effects of EMF exposure are inconclusive and speculative in nature, impacts are not regarded as significant. No hazardous materials exist on the Montecito sub-project site, so no public safety impacts associated with hazardous materials would occur. Hazardous materials located on the Sycamore Estates sub-project site would be removed or remediated with implementation of development, and mitigation would be required similar to that proposed by the Project. These effects are consistent with those identified for the proposed Project. As with the proposed Project, public safety impacts would be mitigated to below a level of significance.

Water Conservation: Because a fewer number of residential units would occur on the Montecito and Sycamore Estates sub-project sites as compared to the proposed Project, water conservation impacts would be reduced. Direct impacts would be mitigated to below a level of significance, but cumulative impacts, although reduced, would remain significant and unmitigable.

Natural Resources: Implementation of the Reduced Grading Alternative would preclude future use of the site for agricultural use and mineral resource extraction. The preclusion of agricultural uses would not be regarded as significant due to the site's poor agricultural soil quality. As with the proposed Project, the preclusion of mining would be regarded as a cumulatively significant impact due to the limited supply of aggregate resources and reserves located in the San Diego Production-Consumption Region.

Cumulative Impacts: The Reduced Grading Alternative would reduce the Project's cumulative impacts associated with landform alteration/visual quality, water quality, traffic, air quality, paleontological resources, public services (landfill capacity) and water conservation. Although reduced, these impacts would remain significant and unmitigable. Cumulative impacts to the loss of non-native grassland would be the same as that which would occur under the proposed Project.

9.5.3 SUMMARY OF ENVIRONMENTAL ANALYSIS OF THE REDUCED GRADING ALTERNATIVE

Compared to the proposed Project, the Reduced Grading Alternative would avoid direct landform alteration impacts and decrease significant impacts associated with biology, visual quality, erosion, water quality, traffic, noise, air quality, paleontological resources and water conservation. Cultural resource impacts would be avoided. Public safety and natural resources impacts would be the same as would occur under the proposed Project. Although direct impacts to biological habitats would be reduced, indirect but mitigable impacts may be increased, because of increased proximity of the open space to domestic animals and humans. Cumulative impacts also would be reduced as discussed previously. Fire protection impacts would be mitigatable, but may be increased due to the provision of a circuitous private driveway circulation system.

9.6 RPO CONSISTENT ALTERNATIVE

9.6.1 DESCRIPTION OF THE RPO CONSISTENT ALTERNATIVE

The proposed Project is consistent with the provisions of RPO for hillside and biological resource encroachment on a combined basis under Council Policy 600-40. On an individual basis, the Montecito sub-project would exceed RPO hillside encroachment allowances. Also, the proposed Project would impact 0.01-acre of natural flood channel on the Montecito sub-project site due to the construction of a water line and 0.53-acre of natural flood channel on the Sycamore Estates sub-project site due to the construction of Rancho Encantada Parkway and detention basins. In addition, 0.02-acre of natural flood channel would be impacted if the proposed sewer pump station design option is selected for implementation. Wetland impacts are not permitted by RPO. Thus, the purpose of this Alternative is to comply with the strict application of RPO through avoiding impacts to wetlands and by reducing hillside encroachment on the Montecito sub-project site to that which would be permitted by RPO on a parcel-only basis.

As conceptually illustrated in Figure 9-5, *RPO Consistent Alternative*, this Alternative would develop the site with single-family residential uses, affordable housing units, and a 14.0-acre school/park site, similar to that proposed by the Project. Total density for this Alternative would be 606 dwelling units as compared to 941 for the proposed Project. It is further assumed that the reduced density generated by this Alternative would not alleviate the need to provide a school on the site. Rancho Encantada Parkway and Street "B" would occur on the site, as proposed by the Project, but in order to avoid wetland disturbance, one 450-foot long bridge would be necessary on Rancho Encantada Parkway. Under this Alternative, approximately 532 acres of the project site would be graded or disturbed, which is a 211-acre reduction as compared to the proposed Project. Provided below is a summary of the RPO encroachment allowances, which shows that this Alternative would comply with the provisions of RPO for sensitive hillsides and biological resources.

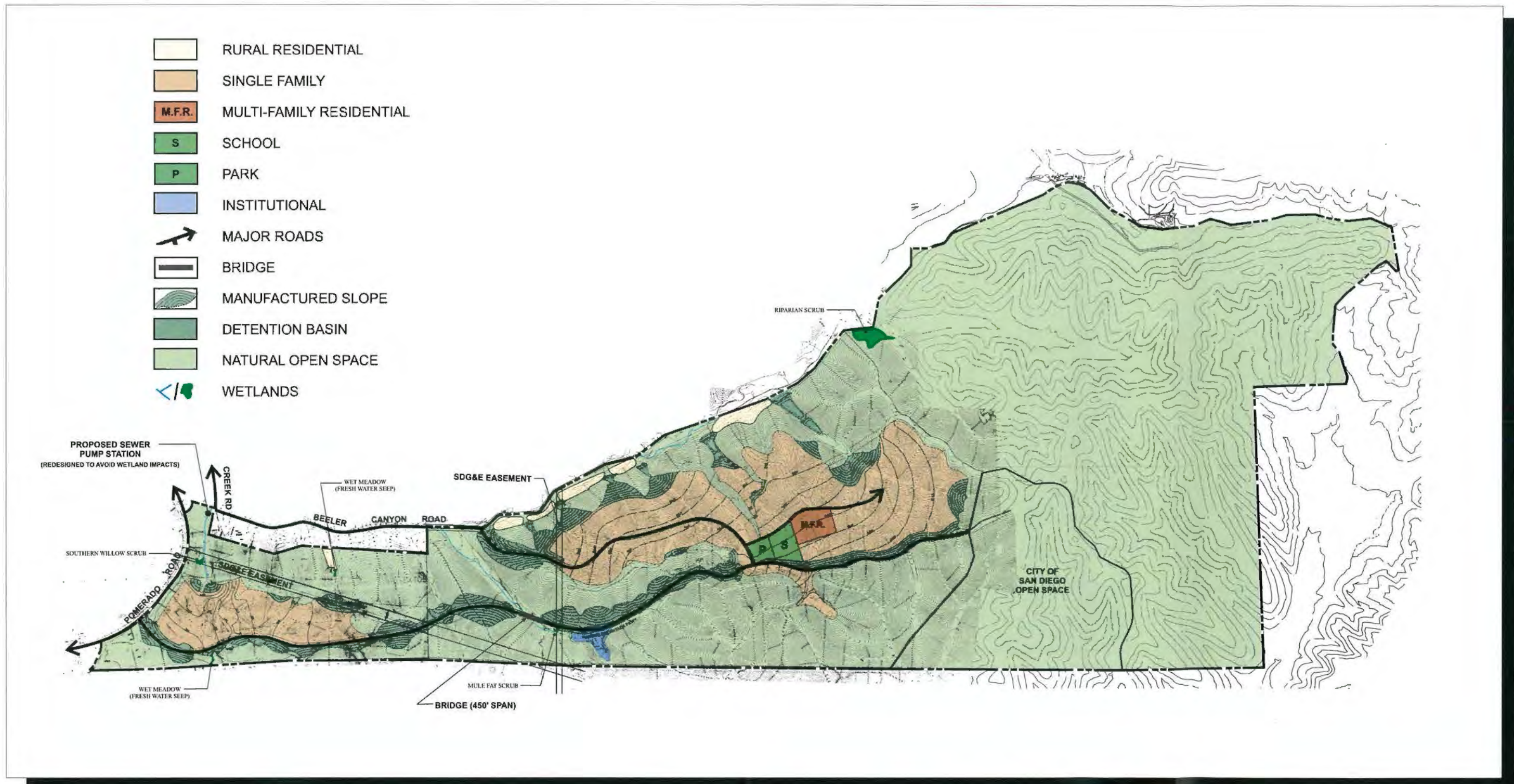


Figure 9-5
R.P.O. CONSISTENT ALTERNATIVE

PROJECT-WIDE RPO ANALYSIS FOR THE RPO CONSISTENT ALTERNATIVE

Parcel	Total Area (Acres) 1	Sensitive Biology/ 25% Slopes (Acres/ % of Parcel)	Area with no Sensitive Biology/ 25% Slopes (Acres) 2	Maximum Encroachment Allowance for:		Actual Exempt Area (Acres) 5	Maximum Developable Area per RPO (Acres) 2+3+smaller of (4&5)	Graded Area per the RPO Consistent Alternative
				Developable Area (Acres) 3	Exempt Area (Acres) 4			
Montecito	278.6	219.4 (78.8%)	59.2	26.3	32.9	25.8	111.3	92.0
Sycamore Estates	2,132.0	1,864.0 (87.5)	267.4	298.2	279.6	102.7	668.3	440.0
City of San Diego	248.0	246.8 (99.5)	1.2	49.4	37.0	5.9	56.5	0.0
TOTAL	2,658	2,330.2	327.8	373.9	349.5	128.5	836.1	532.0

Montecito Sub-Project

The Montecito sub-project site would be developed similar to that of the proposed Project, but a 61-acre reduction in graded area would occur in order to avoid the sub-project's 0.01-acre impact to wetlands and to reduce the grading footprint so that Montecito could meet its RPO maximum encroachment allowance of 111.3 acres into hillsides and biologically sensitive lands. In total, 144 dwelling units would occur under this Alternative. This would result in a reduction of 134 units as compared to the proposed Project. North of the existing SDG&E easement, the site would be retained as open space, with the exception of one single-family residence that would be retained near the northern site boundary. Rancho Encantada Parkway would traverse the southern portion of the property, similar to the alignment proposed by the proposed Project, and would account for approximately 9.1 acres. An 8.4-acre MHPA boundary adjustment would occur on-site, and approximately 186 acres of the site would be preserved as natural open space. Detention facilities and other infrastructure such as water and sewer lines would be necessary within the open space, similar to that proposed by the Project. The exception is that the water line connecting to Pomerado Road would be moved southerly to avoid the 0.01-acre wetland impact.

Sycamore Estates Sub-Project

The proposed Project's 0.53-acre wetland impact is primarily caused by the placement of detention basins in the sub-project site's westerly drainage course. To eliminate the need for detention basins in

this area, all development in Sycamore Estates' drainage basin 800 (see Figure 4.5-4) would be eliminated. Except for a segment of Rancho Encantada Parkway and an existing industrial use area that would be developed with institutional uses, Drainage Basin 800 would be preserved in open space and development would be shifted easterly. Grading would occur on 440.0 acres of the site, a 150-acre reduction as compared to the proposed Project. In total, 462 dwelling units would occur under this Alternative, with 410 single-family units and 52 affordable housing units. This would result in a reduction of 144 units as compared to the proposed Project. The affordable housing site and school/park site would occur in the same manner as proposed by the Project, but would be reduced in size. Approximately 15 custom, one-acre lots would occur in the northern portion of the sub-project site, along Beeler Canyon Road. Rancho Encantada Parkway would traverse the southern portion of the project site, and a local collector would provide a connection to Beeler Canyon Road. Rancho Encantada Parkway would be bridged in one location on-site to avoid wetland disturbance. The bridge would span approximately 450 feet.

Sewer Pump Station Design Option

In order to avoid 0.02-acre of wetland impacts caused by the proposed sewer pump station's access road, the pump station's access road would be redesigned as a bridge under this Alternative to avoid wetland impacts.

9.6.2 ENVIRONMENTAL ANALYSIS OF THE RPO CONSISTENT ALTERNATIVE

Land Use: The RPO Consistent Alternative would have approximately the same land use impacts as the proposed Project, with the exception that RPO impacts would not occur because impacts to wetlands would be avoided. This Alternative would achieve 335 less residential housing units as compared to the proposed Project but this would not result in a land use impact.

Landform Alteration/Visual Quality: Under this Alternative, approximately 61 less acres would be graded on the Montecito sub-project site and 150 less acres would be graded on the Sycamore Estates sub-project site. Landform alteration impacts would remain significant, but would be reduced as compared to the proposed Project due the reduction in graded area and earthwork quantities. The visual quality impact of the proposed Project caused by the transformation of a largely undeveloped view to that of a view of development surrounded by open space which appears monotonous from a distance, would remain but would be reduced as compared with the proposed Project with implementation of this Alternative.

Biological Resources: This Alternative would result in fewer impacts to biology as compared to the proposed Project. Implementation of this Alternative would reduce impacts to biological resources over that which would occur with implementation of the proposed Project, because the disturbance area would be reduced by approximately 211 acres. The following impacts to vegetation communities would occur:

Vegetation Community	Montecito Sub-Project Site	Sycamore Estates Sub-Project Site
Oak Woodland	--	3.9
Diegan Coastal Sage Scrub (& disturbed)	24.7	96.2
Southern Mixed Chaparral (& disturbed)	29.8	175.4
Chamise Chaparral (& disturbed)	33.7	118.1
Non-Native Grassland	3.3	5.7
Developed/Disturbed Habitat	0.5	40.7
Totals	92.0	440.0

No impacts to wetlands would occur on the project site under this Alternative. In addition, the watershed for the willowy Monardella would be preserved. As with the proposed Project, cumulative impacts to loss of non-native grassland (raptor foraging habitat) would be significant and unmitigable. Impacts to the long-term conservation of biological resources would not occur because no encroachment into the MHPA would occur on the Sycamore Estates sub-project site. An 8.4-acre MHPA boundary adjustment would occur on the Montecito sub-project site which would be functionally equivalent. Overall, biological impacts would be reduced as compared to the proposed Project.

Geology/Soils: Because 211 less acres of the site would be graded under this Alternative, erosional impacts associated with the grading and construction would be reduced as compared to the proposed Project. Special geotechnical considerations would need to be made for construction of the necessary bridge structures, and site-specific geologic technical reports would be required to ensure the safety of the bridge supports during a seismic event. With adherence to recommendations of the geotechnical reports, potential geologic hazard impacts would be reduced to below a level of significance. Overall, geology/soils impacts would be reduced as compared to the proposed Project.

Hydrology/Water Quality: Under this Alternative, significant cumulative water quality impacts associated with urban pollutants would be slightly less because a reduced amount grading and creation of impervious surfaces would occur on the property. Reduced short-term and long-term direct water quality impacts would occur due to erosion. These impacts would remain significant and unmitigable. Cumulative water quality impacts would remain significant and unmitigated. Overall, hydrology/water quality impacts would be reduced as compared to the proposed Project.

Transportation: Because 335 fewer residential units would be constructed under this Alternative, a reduction of 5,856 ADT would occur at a rate of 8 ADT for each of the 52 affordable housing units and 10 ADT for each of the 554 single family detached units. This reduction from 10,548 for the proposed Project to 4,692 ADT would significantly reduce the

direct and cumulative traffic impacts and the amount of mitigation required. As with the proposed project, direct and cumulative impacts on Pomerado Road, although reduced, would be significant and unmitigable.

Noise: Noise impacts would be reduced as compared to the proposed Project, because of reduced average daily traffic volumes. Structures proposed within 200 feet of the Pomerado Road centerline or within 80 feet of the Rancho Encantada centerline would be subject to noise attenuation measures to reduce interior and exterior noise levels caused by vehicular traffic. As with the proposed Project, noise impacts would be mitigated to below a level of significance.

Air Quality: Short-term air quality impacts would be reduced due to the reduction in graded areas. In addition, the contribution to cumulative air quality impacts would be reduced due to the reduction in ADT generation. Nonetheless, cumulative air quality impacts would remain significant and unmitigable.

Cultural Resources: No important cultural resources are located on the Montecito sub-project site. The significant direct, but mitigated, direct cultural resource impact on the Sycamore Estates sub-project site would be avoided under this Alternative, because the area containing the potentially significant cultural resource site would be preserved as open space.

Paleontological Resources: Because less area of the site would be graded (a reduction of 211 acres), the potential for impacts to paleontological resources would be reduced, but not avoided. Overall, paleontological impacts would be reduced as compared to the proposed Project. As with the proposed Project, direct impacts would be mitigated to below a level of significance, but cumulative impacts would remain significant and unmitigable.

Public Services: As with the proposed Project, public services such as police, fire, solid waste disposal and libraries would be available to service development on the project site. Because a fewer number of residential units would occur on the Montecito and Sycamore Estates sub-project sites under this Alternative, public service impacts would be reduced as compared to the proposed Project. Although reduced, cumulative impacts on landfill capacity would be significant and unmitigable.

Public Safety: Impacts would be the same as that which would occur under the proposed Project. Because health effects of EMF exposure are inconclusive and speculative in nature, impacts are not regarded as significant. No hazardous materials exist on the Montecito sub-project site, so no public safety impacts associated with hazardous materials would occur. Hazardous materials located on the Sycamore Estates sub-project site would be removed or remediated with implementation of development, and mitigation would be required similar to that proposed by the Project. As with the proposed Project, public safety impacts would be mitigated to below a level of significance.

Water Conservation: Because 335 fewer residential units would occur on the site, water usage would be lessened as compared to the proposed Project. As with the proposed Project, direct water conservation impacts would be mitigated to below a level of significance, but cumulative impacts would remain significant and unmitigable.

Natural Resources: Impacts would be the same as the proposed Project, in that implementation of the RPO Consistent Alternative would preclude future use of the site for agricultural use and mineral resource extraction. The preclusion of agricultural uses would not be regarded as significant due to the site's poor agricultural soil quality. The preclusion of aggregate mining would be regarded as cumulatively significant and unmitigable.

Cumulative Impacts: The RPO Consistent Alternative would reduce the Project's contribution to cumulatively significant and unmitigable impacts associated with landform alteration/visual quality, water quality, transportation, air quality, paleontological resources, landfill capacity, and water conservation. As with the proposed Project, cumulative impacts to loss of non-native grassland (raptor foraging habitat) would be significant and unmitigable.

9.6.3 SUMMARY OF ENVIRONMENTAL ANALYSIS OF THE RPO CONSISTENT ALTERNATIVE

Compared to the proposed Project, the RPO Consistent Alternative would avoid impacts to wetlands. Due to a reduction in graded area and the construction of a fewer number of residential units, impacts to landform alteration, biological resources, hydrology/water quality, traffic, noise, air quality, paleontological resources, public services and water conservation would be reduced as compared to the proposed Project; however, all impact significance and mitigation conclusions would remain the same. Impacts to cultural resources would be avoided and natural resources would be the same as or similar to the proposed Project. This Alternative would partially meet the goals of the proposed Project. However, 335 fewer residential units would be achieved than the proposed Project.

9.7 COMPARISON OF PROJECT ALTERNATIVES

Table 9-1, *Matrix Comparison of Proposed Project and Project Alternatives*, provides a general comparison of the proposed project and the project alternatives. CEQA requires that an EIR select the “environmentally superior” project based on the evaluation of the project and project alternatives. This analysis has shown that the *No Project* alternative is not the most environmentally superior project. Rather, the *Reduced Project Alternative*, as shown in Table 9-1, would be considered the environmentally superior project, because it would reduce environmental effects associated with the project while implementing a majority of the project objectives.

Table 9-1

MATRIX COMPARISON OF PROPOSED PROJECT AND PROJECT OBJECTIVES

Notes: (1) Impacts Would Not be Significant; (2) Impacts Would be Significant and Mitigated; (3) Impacts Would be Significant and Unmitigable.

IMPACT CATEGORIES	IMPACTS OF PROPOSED PROJECT		IMPACT LEVEL OF ALTERNATIVE COMPARED TO PROPOSED PROJECT				
	DESCRIPTION	SIGNIFICANCE AFTER MITIGATION	ALT. 1 No Project Existing Zoning	ALT. 2 No Project Resource Extraction	ALT. 3 Reduced Project	ALT. 4 Reduced Grading	ALT. 5 RPO Consistent
LAND USE							
Land Use	Consistency with Industrial Element of the Progress Guide and General Plan.	Significant (3) (Sycamore only)	<u>Sycamore:</u> LOWER (1) <u>Montecito:</u> SIMILAR (1)	<u>Sycamore:</u> LOWER (1) <u>Montecito:</u> SIMILAR (1)	<u>Sycamore:</u> SIMILAR (3) <u>Montecito:</u> SIMILAR (1)	<u>Sycamore:</u> SIMILAR (3) <u>Montecito:</u> SIMILAR (1)	<u>Sycamore:</u> SIMILAR (3) <u>Montecito:</u> SIMILAR (1)
	Compatible with Council Policy 600-29 and the Managed Growth Initiative.	Not Significant (1)	HIGHER (2)	SIMILAR (1)	SIMILAR (1)	SIMILAR (1)	SIMILAR (1)
	Compatible with MHPA Adjacency Guidelines.	Not Significant (2)	HIGHER (2)	HIGHER (2)	LOWER (2)	HIGHER (2)	LOWER (2)
Sycamore Estates	Compatible with the Resource Protection Ordinance	Not Significant (2)	<u>Sycamore:</u> SIMILAR (2) <u>Montecito:</u> LOWER (2)	<u>Sycamore:</u> HIGHER (3) <u>Montecito:</u> LOWER (2)	<u>Sycamore:</u> LOWER (2) <u>Montecito:</u> LOWER (1)	<u>Sycamore:</u> LOWER (2) <u>Montecito:</u> LOWER (2)	<u>Sycamore:</u> LOWER (1) <u>Montecito:</u> LOWER (1)
VISUAL QUALITY							
Visual Quality	Impacts due to change in site character from undeveloped land to suburban/urban development.	Significant - Direct (3) and Cumulative (3)	<u>Sycamore:</u> HIGHER (3) <u>Montecito:</u> LOWER (3)	<u>Sycamore:</u> LOWER (3) <u>Montecito:</u> LOWER (3)	<u>Sycamore:</u> LOWER (3) <u>Montecito:</u> LOWER (3)	<u>Sycamore:</u> LOWER (2) <u>Montecito:</u> LOWER (2)	<u>Sycamore:</u> LOWER (3) <u>Montecito:</u> LOWER (3)

IMPACT CATEGORIES	IMPACTS OF PROPOSED PROJECT		IMPACT LEVEL OF ALTERNATIVE COMPARED TO PROPOSED PROJECT				
	DESCRIPTION	SIGNIFICANCE AFTER MITIGATION	ALT. 1 No Project Existing Zoning	ALT. 2 No Project Resource Extraction	ALT. 3 Reduced Project	ALT. 4 Reduced Grading	ALT. 5 RPO Consistent
LANDFORM ALTERATION							
Landform Alteration	Impacts due to increased grading area and grading quantity.	Significant - Direct (3) and Cumulative (3)	<u>Sycamore:</u> HIGHER (3,3) <u>Montecito:</u> LOWER (3,3)	<u>Sycamore:</u> HIGHER (3,3) <u>Montecito:</u> LOWER (3,3)	<u>Sycamore:</u> LOWER (3,3) <u>Montecito:</u> LOWER (3,3)	<u>Sycamore:</u> LOWER (2,3) <u>Montecito:</u> LOWER (2,3)	<u>Sycamore:</u> LOWER (3,3) <u>Montecito:</u> LOWER (3,3)
BIOLOGICAL RESOURCES							
Biological Resources	Impacts to upland habitats, sensitive plants and sensitive wildlife.	Significant (3) Cumulative (Raptor Foraging Habitat)	<u>Sycamore:</u> LOWER (3) <u>Montecito:</u> LOWER (3)	<u>Sycamore:</u> HIGHER (3) <u>Montecito:</u> LOWER (3)	<u>Sycamore:</u> LOWER (3) <u>Montecito:</u> LOWER (3)	<u>Sycamore:</u> LOWER (3) <u>Montecito:</u> LOWER (3)	<u>Sycamore:</u> LOWER (3) <u>Montecito:</u> LOWER (3)
	Impacts to wetlands.	Not Significant (2)	LOWER (2)	HIGHER (2)	LOWER (2)	LOWER (2)	LOWER (1)
	MHPA Consistency.	Not Significant (2)	LOWER (2)	LOWER (2)	LOWER (2)	LOWER (2)	LOWER (2)
GEOLOGY/SOILS							
Geology/ Soils	Erosional Impacts	Not Significant (2)	LOWER (2)	<u>Sycamore:</u> HIGHER (2) <u>Montecito:</u> LOWER (2)	LOWER (2)	LOWER (2)	LOWER (2)
	Geologic Hazard/Seismic Hazard	Not Significant (2)	SIMILAR (2)	SIMILAR (2)	SIMILAR (2)	SIMILAR (2)	SIMILAR (2)

IMPACT CATEGORIES	IMPACTS OF PROPOSED PROJECT		IMPACT LEVEL OF ALTERNATIVE COMPARED TO PROPOSED PROJECT				
	DESCRIPTION	SIGNIFICANCE AFTER MITIGATION	ALT. 1 No Project Existing Zoning	ALT. 2 No Project Resource Extraction	ALT. 3 Reduced Project	ALT. 4 Reduced Grading	ALT. 5 RPO Consistent
TRAFFIC							
Traffic	Average Daily Traffic (ADT) generation.	Not Significant (2)	<u>Sycamore:</u> HIGHER (2) <u>Montecito:</u> LOWER (2)	<u>Sycamore:</u> HIGHER (2) <u>Montecito:</u> LOWER (2)	<u>Sycamore:</u> LOWER (2) <u>Montecito:</u> SIMILAR (2)	<u>Sycamore:</u> LOWER (2) <u>Montecito:</u> LOWER (2)	<u>Sycamore:</u> LOWER (2) <u>Montecito:</u> LOWER (2)
	Direct and cumulative impacts	Significant to Pomerado Road - Direct (3) and Cumulative (3)	<u>Sycamore:</u> HIGHER (3) <u>Montecito:</u> SIMILAR (3)	<u>Sycamore:</u> HIGHER (3) <u>Montecito:</u> SIMILAR (3)	LOWER (3)	LOWER (3)	LOWER (3)
NOISE							
Traffic and Stationary Noise	Impacts from stationary sources (blasting operations or manufacturing).	Not Significant (1)	<u>Sycamore:</u> HIGHER (2) <u>Montecito:</u> SIMILAR (1)	<u>Sycamore:</u> HIGHER (2) <u>Montecito:</u> SIMILAR (1)	SIMILAR (1)	SIMILAR (1)	SIMILAR (1)
	Impacts from increased traffic.	Not Significant (2)	<u>Sycamore:</u> HIGHER (2) <u>Montecito:</u> SIMILAR (2)	LOWER (2)	LOWER (2)	LOWER (2)	LOWER (2)

IMPACT CATEGORIES	IMPACTS OF PROPOSED PROJECT		IMPACT LEVEL OF ALTERNATIVE COMPARED TO PROPOSED PROJECT				
	DESCRIPTION	SIGNIFICANCE AFTER MITIGATION	ALT. 1 No Project Existing Zoning	ALT. 2 No Project Resource Extraction	ALT. 3 Reduced Project	ALT. 4 Reduced Grading	ALT. 5 RPO Consistent
AIR QUALITY							
Air Quality	Short-term fugitive dust impacts.	Not Significant (2)	SIMILAR (2)	HIGHER (3)	LOWER (2)	LOWER (2)	LOWER (2)
	Stationary source impacts	Not Significant (1)	<u>Sycamore:</u> HIGHER (2) <u>Montecito:</u> SIMILAR (1)	<u>Sycamore:</u> HIGHER (2) <u>Montecito:</u> SIMILAR (1)	SIMILAR (1)	SIMILAR (1)	SIMILAR (1)
	Vehicular emission impacts.	Significant - Cumulative (3)	<u>Sycamore:</u> HIGHER (3) <u>Montecito:</u> SIMILAR (3)	<u>Sycamore:</u> HIGHER (3) <u>Montecito:</u> SIMILAR (3)	LOWER (3)	LOWER (3)	LOWER (3)
HYDROLOGY/WATER QUALITY							
Hydrology/ Water Quality	Urban pollutant impacts.	Significant - Cumulative (3)	<u>Sycamore:</u> HIGHER (3) <u>Montecito:</u> SIMILAR (3)	<u>Sycamore:</u> HIGHER (3) <u>Montecito:</u> SIMILAR (3)	LOWER (3)	LOWER (3)	LOWER (3)
	Hydrologic Impacts.	Not Significant (1)	LOWER (1)	<u>Sycamore:</u> HIGHER (2) <u>Montecito:</u> SIMILAR (1)	LOWER (1)	LOWER (1)	LOWER (1)
CULTURAL RESOURCES							
Cultural Resources	Impacts to cultural resources	Not Significant (Sycamore - 2) (Montecito - 1)	<u>Sycamore:</u> SIMILAR (2) <u>Montecito:</u> SIMILAR (1)	<u>Sycamore:</u> SIMILAR (2) <u>Montecito:</u> SIMILAR (1)	<u>Sycamore:</u> LOWER (1) <u>Montecito:</u> SIMILAR (1)	<u>Sycamore:</u> LOWER (1) <u>Montecito:</u> LOWER (1)	<u>Sycamore:</u> LOWER (1) <u>Montecito:</u> LOWER (1)

IMPACT CATEGORIES	IMPACTS OF PROPOSED PROJECT		IMPACT LEVEL OF ALTERNATIVE COMPARED TO PROPOSED PROJECT				
	DESCRIPTION	SIGNIFICANCE AFTER MITIGATION	ALT. 1 No Project Existing Zoning	ALT. 2 No Project Resource Extraction	ALT. 3 Reduced Project	ALT. 4 Reduced Grading	ALT. 5 RPO Consistent
PALEONTOLOGICAL RESOURCES							
Paleontological Resources	Impacts due to grading or trenching.	Significant - Cumulative (3)	LOWER (3)	<u>Sycamore:</u> HIGHER (3) <u>Montecito:</u> LOWER (3)	LOWER (3)	LOWER (3)	LOWER (3)
PUBLIC SERVICES							
Fire Protection	Impacts to Fire Services.	Not Significant (Sycamore - 2) (Montecito - 1)	<u>Sycamore:</u> SIMILAR (2) <u>Montecito:</u> SIMILAR (1)	<u>Sycamore:</u> LOWER (2) <u>Montecito:</u> SIMILAR (1)	<u>Sycamore:</u> HIGHER (2) <u>Montecito:</u> SIMILAR (1)	<u>Sycamore:</u> HIGHER (2) <u>Montecito:</u> SIMILAR (1)	<u>Sycamore:</u> LOWER (2) <u>Montecito:</u> SIMILAR (1)
Police Protection	Impacts to Police Services.	Not Significant (1)	<u>Sycamore:</u> LOWER (1) <u>Montecito:</u> SIMILAR (1)	<u>Sycamore:</u> LOWER (1) <u>Montecito:</u> SIMILAR (1)	<u>Sycamore:</u> LOWER (1) <u>Montecito:</u> SIMILAR (1)	<u>Sycamore:</u> LOWER (1) <u>Montecito:</u> LOWER (1)	<u>Sycamore:</u> LOWER (1) <u>Montecito:</u> LOWER (1)
Library Facilities	Impacts to Library Facilities.	Not Significant (1)	<u>Sycamore:</u> LOWER (1) <u>Montecito:</u> SIMILAR (1)	<u>Sycamore:</u> LOWER (1) <u>Montecito:</u> SIMILAR (1)	<u>Sycamore:</u> LOWER (1) <u>Montecito:</u> SIMILAR (1)	<u>Sycamore:</u> LOWER (1) <u>Montecito:</u> LOWER (1)	<u>Sycamore:</u> LOWER (1) <u>Montecito:</u> LOWER (1)
Schools	Impacts to Schools.	Not Significant (2)	<u>Sycamore:</u> LOWER (2) <u>Montecito:</u> SIMILAR (2)	<u>Sycamore:</u> LOWER (1) <u>Montecito:</u> LOWER (2)	<u>Sycamore:</u> LOWER (2) <u>Montecito:</u> SIMILAR (2)	<u>Sycamore:</u> LOWER (2) <u>Montecito:</u> LOWER (2)	<u>Sycamore:</u> LOWER (2) <u>Montecito:</u> LOWER (2)

IMPACT CATEGORIES	IMPACTS OF PROPOSED PROJECT		IMPACT LEVEL OF ALTERNATIVE COMPARED TO PROPOSED PROJECT				
	DESCRIPTION	SIGNIFICANCE AFTER MITIGATION	ALT. 1 No Project Existing Zoning	ALT. 2 No Project Resource Extraction	ALT. 3 Reduced Project	ALT. 4 Reduced Grading	ALT. 5 RPO Consistent
Public Parks	Impacts to Public Parks.	Not Significant (2)	<u>Sycamore:</u> LOWER (2) <u>Montecito:</u> SIMILAR (2)	<u>Sycamore:</u> LOWER (1) <u>Montecito:</u> SIMILAR (2)	<u>Sycamore:</u> LOWER (2) <u>Montecito:</u> HIGHER (2)	<u>Sycamore:</u> LOWER (2) <u>Montecito:</u> LOWER (2)	<u>Sycamore:</u> LOWER (2) <u>Montecito:</u> LOWER (2)
Sewer	Impacts to Sewer.	Not Significant (1)	<u>Sycamore:</u> HIGHER (2) <u>Montecito:</u> SIMILAR (1)	<u>Sycamore:</u> LOWER (2) <u>Montecito:</u> SIMILAR (1)	<u>Sycamore:</u> LOWER (1) <u>Montecito:</u> SIMILAR (1)	<u>Sycamore:</u> LOWER (1) <u>Montecito:</u> LOWER (1)	<u>Sycamore:</u> LOWER (1) <u>Montecito:</u> LOWER (1)
Water	Impacts to Water.	Not Significant (1)	<u>Sycamore:</u> HIGHER (2) <u>Montecito:</u> SIMILAR (1)	<u>Sycamore:</u> LOWER (1) <u>Montecito:</u> SIMILAR (1)	<u>Sycamore:</u> LOWER (1) <u>Montecito:</u> SIMILAR (1)	<u>Sycamore:</u> LOWER (1) <u>Montecito:</u> LOWER (1)	<u>Sycamore:</u> LOWER (1) <u>Montecito:</u> LOWER (1)
Solid Waste	Impacts to Landfill Capacity.	Significant - Cumulative (3)	<u>Sycamore:</u> LOWER (3) <u>Montecito:</u> SIMILAR (3)	<u>Sycamore:</u> LOWER (3) <u>Montecito:</u> SIMILAR (3)	<u>Sycamore:</u> LOWER (3) <u>Montecito:</u> SIMILAR (3)	<u>Sycamore:</u> LOWER (3) <u>Montecito:</u> LOWER (3)	<u>Sycamore:</u> LOWER (3) <u>Montecito:</u> LOWER (3)
PUBLIC SAFETY							
Public Safety	Impacts due to residential proximity to mining or manufacturing uses.	Not Significant (1)	HIGHER (2)	HIGHER (2)	SIMILAR (1)	SIMILAR (1)	SIMILAR (1)
	Impacts due to EMF	Not Significant (1)	SIMILAR (1)	SIMILAR (1)	SIMILAR (1)	SIMILAR (1)	SIMILAR (1)
	Impacts due to existing on-site potentially hazardous materials.	Not Significant (Sycamore - 2) (Montecito - 1)	<u>Sycamore:</u> SIMILAR (2) <u>Montecito:</u> SIMILAR (1)	<u>Sycamore:</u> SIMILAR (2) <u>Montecito:</u> SIMILAR (1)	<u>Sycamore:</u> SIMILAR (2) <u>Montecito:</u> SIMILAR (1)	<u>Sycamore:</u> SIMILAR (2) <u>Montecito:</u> SIMILAR (1)	<u>Sycamore:</u> SIMILAR (2) <u>Montecito:</u> SIMILAR (1)

IMPACT CATEGORIES	IMPACTS OF PROPOSED PROJECT		IMPACT LEVEL OF ALTERNATIVE COMPARED TO PROPOSED PROJECT				
	DESCRIPTION	SIGNIFICANCE AFTER MITIGATION	ALT. 1 No Project Existing Zoning	ALT. 2 No Project Resource Extraction	ALT. 3 Reduced Project	ALT. 4 Reduced Grading	ALT. 5 RPO Consistent
WATER CONSERVATION							
Water Conservation	Water demand impact.	Significant - Cumulative (3)	HIGHER (3)	LOWER (3)	LOWER (3)	LOWER (3)	LOWER (3)
NATURAL RESOURCES							
Natural Resources	Cumulative aggregate resource impacts.	Significant (3)	SIMILAR (3)	LOWER (1)	SIMILAR (3)	SIMILAR (3)	SIMILAR (3)

10.0 References

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12.0 Certification Page

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Appendix C1—Geological Report

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Appendix C3—Geological Report Addendum

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Appendix D1—Hydrology Report

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Appendix D2—Hydrology Report

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Appendix E—Traffic Study

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Appendix F—Noise Study

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Appendix G1—Air Quality Analysis

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Appendix G2—Air Quality Analysis Addendum

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Appendix H1—Cultural Resources Survey

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Appendix H4—Cultural Resources Survey Addendums

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Appendix H5—Cultural Resources Significance Evaluation

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Appendix I1—Water Report

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Appendix J2—Sewer Report

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RANCHO ENCANTADA
CANDIDATE FINDINGS
AND
STATEMENT OF OVERRIDING CONSIDERATIONS

June 28, 2001

The California Environmental Quality Act (CEQA) requires that no public agency shall approve or carry out a project for which an environmental impact report has been certified which identifies one or more significant effects on the environment if the project is approved or carried out unless the public agency makes one or more of the following findings, accompanied by a brief explanation of the rationale for each finding:

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

CEQA further requires that, with respect to significant effects, which were subject to a finding under item (3) above, the public agency finds that specific overriding economic, legal, social, technological, or other benefits of the project outweigh the significant effects on the environment (Cal. Pub. Res. Code Section 21081 (b)(3)).

The following Findings and Statement of Overriding Considerations have been submitted by the project applicant as candidate Findings to be made by the decision making body. The Environmental Analysis Section of the Development Services Department does not recommend that the discretionary body either adopt or reject these Findings. They are attached to allow readers of this report an opportunity to review the potential reasons for approving the project despite the unmitigable significant effects identified in the final EIR.

**Findings and Statement of Overriding Considerations
for the Proposed Rancho Encantada Project
(LDR No. 99-1094; SCH No. 2000011053)**

INTRODUCTION

The following Findings and Statement of Overriding Considerations (SOC) are made relative to the conclusions of the Final Environmental Impact Report (FEIR) for the Rancho Encantada Project "the Project" (SCH. No. 2000011053; LDR No.99-1094). The 2,658-acre project site is comprised of three land areas: Montecito (278 acres), Sycamore Estates (2,132 acres), and a City of San Diego-owned parcel (248 acres). The Project proposes a maximum of 941 residential units, two institutional sites, a school site, a public park site, and various infrastructure and utility improvements. Rancho Encantada Parkway is proposed to be developed on-site as the project's primary roadway, and off-site improvements would occur on Pomerado Road and at the intersections of Spring Canyon Road with Spruce Run Drive, Semillon Boulevard and Scripps Creek Drive. As a design option, off-site improvements also would occur along a gravity sewer alignment north of the proposed project site. The proposed project is located within the City of San Diego's Future Urbanizing Area (FUA), and includes portions of the Multiple Habitat Planning Area (MHPA) of the City's Multiple Species Conservation Program (MSCP) preserve system.

Permits and discretionary actions associated with this project, issued by the city, are individual Planned Residential Development Permit (PRD) applications, Vesting Tentative Map (VTM) applications, a Rezone for the Sycamore Estates sub-project site, and MHPA boundary adjustment for the Montecito and Sycamore Estates sub-project areas. A Resource Protection Ordinance (RPO) permit is required to implement the project, because of encroachment into environmentally sensitive lands. In addition, various other state and federal permits would be required to implement the Rancho Encantada project.

CONCLUSIONS OF THE EIR

The final EIR evaluates the following environmental issues in relation to the Project: land use, landform/visual quality, biological resources, geology/soils, hydrology/water quality, transportation, noise, air quality, cultural resources, paleontological resources, public services, public safety, water conservation, and natural resources. The final EIR also evaluates cumulative and growth-inducing impacts, as well as alternatives to the proposed Project analyzed in detail in the EIR.

The final EIR indicates that the Rancho Encantada project's direct impacts on the following environmental issues can be lessened or avoided if all the proposed mitigation measures recommended in the final EIR are implemented: biology, geology/soils, hydrology/water quality, noise, air quality, cultural resources, paleontological resources, public services, water conservation and public safety.

Direct impacts associated with consistency with the Industrial Element of the Progress Guide and General Plan (Sycamore Estates sub-project), direct and cumulative impacts

associated with landform alteration/visual quality and transportation (due to contribution of traffic to Pomerado Road), and cumulative impacts associated with biology (loss of foraging habitat), hydrology/water quality, air quality, paleontological resources, water conservation and natural (aggregate) resources would be significant and unmitigable.

FINDINGS

A. SECTION 21081 (A)(1) – FINDINGS

The San Diego City Council, having reviewed and considered the information contained in the final EIR, the appendices to the final EIR, and the Administrative Record, finds, pursuant to State CEQA Guidelines, that changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant effects on the environment as identified in the final EIR with respect to land use (RPO and MSCP consistency), biological resources, geology/soils, hydrology/water quality (direct), noise, air quality (direct), cultural resources, paleontological resources (direct), public services, water conservation (direct) and public safety, as described below.

1. Land Use

Significant Impact: The proposed Montecito sub-project would be inconsistent with the Resource Protection Ordinance (RPO) due to 0.01-acre impact to natural flood channel (wetland) due to a utility line crossing. The Sycamore Estates sub-project would be inconsistent with RPO due to a 0.53-acre impact to natural flood channel (wetland).

In the event that the Montecito sub-project is developed independent of the Sycamore Estates sub-project, the size of the City's MHPA would be reduced by 15.9 acres, creating impacts considered potentially significant to sensitive habitats and resulting in an inconsistency with the City's adopted MSCP. Additionally, potentially significant land use impacts associated with compliance with the MHPA adjacency guidelines could occur on both the Montecito and Sycamore Estates sub-projects due to placement of development adjacent to the MHPA.

Facts in Support of Finding: Inconsistency with the RPO wetland encroachment provisions would be fully mitigated through on-site wetland habitat restoration and/or creation as described below under "Biological Resources" for both the Montecito and Sycamore Estates sub-projects.

Reduction of the MHPA area on the Montecito sub-project site would not significantly impact wildlife movement or management of the MHPA. In the event that the Montecito sub-project is developed independent of the Sycamore Estates sub-project, the Montecito permittee would assure the acquisition of 15.9 acres to be added to the MHPA. Acquisition sites would replace habitat acreage eliminated from the MHPA in-Tier or, if in-Tier replacement is not provided, acquisition sites would contribute positively to preserve functions and values by (a) providing for increased functionality with respect to wildlife movement, habitat linkages, connectivity; (b) providing for increased functionality by eliminating a potential development area in the preserve, thereby minimizing edge effects, fragmentation and management requirements; and (c) providing

for conservation of species of concern not on the MSCP covered species list. Acquisition sites would meet the requirements of boundary adjustment equivalency analysis (Section 5.4.2, City of San Diego MSCP Subarea Plan, August 1998) and must be approved by the U.S. Fish and Wildlife Service (USFWS) and the California Department of Fish and Game (CDFG). Potential inconsistencies with the MHPA land use adjacency guidelines would be mitigated to below a level of significance as described below under "Biological Resources," "Hydrology/Water Quality," and "Noise."

2. Biological Resources

Significant Impact: The proposed Montecito sub-project would result in significant direct biological impacts associated with the loss of 0.01-acre of wetland habitat (natural flood channel), 32.4 acres of Diegan coastal sage scrub, 7.0 acres of Diegan coastal sage scrub/chaparral ecotone, 38.9 acres of southern mixed chaparral, 69.6 acres of chamise chaparral and 1.5 acres of non-native grassland. Implementation of the sewer pump station option would impact an additional 0.02-acre of wetland habitat, 0.8-acre of Diegan coastal sage scrub, 0.1-acre chamise chaparral and 0.1-acre of non-native grassland on the Montecito sub-project site.

The proposed Sycamore Estates sub-project would result in significant direct biological impacts associated with the loss of 0.53-acre of wetland habitat (natural flood channel), 0.9-acre of coast live oak woodland, 3.5 acres of native grassland, 142.0 acres of Diegan coastal sage scrub, 2.7 acres of Diegan coastal sage scrub/chaparral ecotone, 221.9 acres of southern mixed chaparral, and 141.7 acres of chamise chaparral. Potentially significant impacts would occur to an individual coastal California gnatcatcher outside of the MHPA. Significant indirect impacts also would potentially occur to variegated dudleya and an off-site population of willow monardella.

For both the Montecito and Sycamore Estates sub-projects, significant indirect impacts would occur to wetlands with less than 100-foot buffers and significant direct impacts would occur if occupied raptor nests are located in or near construction areas. As noted above under "Land Use," potentially significant indirect biological resource impacts associated with the placement of development adjacent to the MHPA also would occur.

As also discussed above under "Land Use," If the Montecito sub-project site developed independent of the Sycamore Estates sub-project site, the MHPA would be reduced by 15.9 acres on the Montecito sub-project site, resulting in a significant direct impact to long-term conservation of biological resources.

Facts in Support of Finding: The Project's significant direct and indirect impacts to biological resources would be mitigated to below a level of significance with implementation of Mitigation Measures 4.3-1 through 4.3-19 identified in the final EIR. Mitigation for direct impacts to upland vegetation communities would consist of preservation within the Project site at mitigation ratios required by the City's Biology Guidelines. Prior to the issuance of grading permits, a conservation easement would be placed over the open space portions of the site in the acreage amounts designated as preservation areas. Direct impacts to wetlands would be fully mitigated by on-site wetland habitat restoration and/or creation. All impacts to wetlands would be mitigated

"in-kind" and achieve "no-net-loss" of wetland function and values and in accordance with state and federal resource agency approvals. Potentially significant indirect impacts to wetlands would be mitigated through placement of silt fences around all construction areas within 100 feet of wetlands.

Indirect impacts to biological resources within the MHPA would be reduced to below a level of significance through lighting restrictions and fencing and landscape requirements for areas adjacent to conserved open space. In addition, educational materials regarding sensitivity of the MHPA would be distributed by the developer(s) to future Project residents. Mitigation measures contained under "Hydrology/Water Quality" and "Air Quality" would reduce potentially significant indirect impacts to vegetation communities and sensitive plant species associated with erosion, exposure to urban pollutants and dust.

For the Sycamore Estates sub-project, potentially significant impacts to an individual coastal California gnatcatcher outside of the MHPA would be mitigated by either prohibiting grading of occupied habitat during the breeding season, or by incorporation of temporary noise attenuation measures to reduce noise levels to below 60 dBA. No irrigation of the proposed manufactured slopes tributary to the on-site willowy monardella population would be allowed beyond those areas necessary for brush management. Prior to the issuance of a grading permit, silt fences would be installed around all construction areas on slopes within the watershed of the willowy monardella population. These measures would reduce indirect impacts on the species to below a level of significance.

A 348.3-acre net increase to the size of the MHPA would occur. Impacts to the MHPA that would occur if the Montecito sub-project were to be developed independently of the Sycamore Estates sub-project would be reduced to below a level of significance through the implementation of Mitigation Measure 4.3-20 identified in the final EIR which requires the acquisition of 15.9 acres to be added to the MHPA. Acquisition sites would be potentially developable under the requirements of the OR-1 and OR-2 Zones, and development rights would be obtained as part of the acquisition such that the acquired land within the MHPA would no longer be available for development. Acquisition sites would replace habitat acreage eliminated from the MHPA in-Tier or, if in-Tier replacement is not provided, acquisition sites would contribute positively to preserve functions and values. Acquisition sites would also meet the requirements of boundary adjustment equivalency analysis and must be approved by the USFWS and the CDFG.

3. Geology/Soils

Significant Impact: Soil and geologic conditions are identified on both the Montecito and Sycamore Estates sub-project sites which could result in significant impacts. Due to the presence of steep topography and topsoils with high erosion potential on the Montecito and Sycamore Estates sub-projects, as well as the proximity of larger drainage courses, the proposed Project could potentially result in significant short-term erosion and sedimentation impacts.

Facts in Support of Finding: The use of conventional grading techniques and adherence to the recommendations contained in the site-specific Geologic Investigation Reports attached as appendices to the final EIR would reduce significant geologic impacts on both the Montecito and Sycamore Estates sub-project sites to below a level of significance. Erosion impacts would be mitigated to below a level of significance by the provision of sediment and erosion control measures contained in the Hydrology/Water Quality section of the final EIR. In addition, the permittee would retain a soils engineer to monitor grading, construction, and installation of runoff control devices and revegetation of the applicable sub-project site. Prior to the issuance of building permits, the project engineer would submit in writing to the City Engineer verification that the sub-project has complied with the required notes on the grading plan, landscape plan and Storm-Water Pollution Prevention Plan (SWPPP) addressing erosion/urban runoff controls.

4. Hydrology/Water Quality

Significant Impact: Significant direct short-term water quality (sedimentation) impacts would occur to Beeler Creek and Los Penasquitos Lagoon due to grading and construction. Long-term direct water quality impacts (urban pollutants) would occur to Beeler Creek and Penasquitos Lagoon due to the introduction of urban uses and impervious surface areas to the site.

Facts in Support of Finding: Significant short- and long-term direct impacts would be reduced to below a level of significance by implementation of mitigation measures contained in Section 4.5 of the final EIR. Prior to the issuance of grading permits, the owner/permittee would prepare a Stormwater Pollution Prevention Plan (SWPPP) in compliance with the City of San Diego's National Pollutant Discharge Elimination System (NPDES) General Permit. The SWPPP would contain construction-related (temporary) BMPs as well as permanent post-construction BMPs to control the rate, volume and quality of runoff leaving the site.

5. Transportation

Significant Impact: Significant direct and cumulative transportation impacts would occur in the project area, including various intersections, roadway segments, and freeway ramps.

Facts in Support of Finding: Impacts would be mitigated by assuring the construction of the transportation improvements identified in final EIR Section 4.6, prior to

recording of the first final map. The identified improvements would be assured through either a deferred improvement agreement or by permit and bond. Roadway improvements would occur on Pomerado Road, Stonemill Drive, Scripps Poway Parkway, Spring Canyon Road, the northbound I-5 off-ramp at Pomerado Road, and the southbound auxiliary lane on I-15 from Mira Mesa Blvd. to Miramar Way. Except for direct and cumulative impacts to Pomerado Road, transportation impacts would be lessened to below a level of significance.

6. Noise

Significant Impact: Significant interior noise impacts would potentially occur to residential homes on the Montecito sub-project located within 200 feet of the Pomerado Road centerline. Significant interior and exterior noise impacts would potentially occur to residential lots/homes on the Montecito and Sycamore Estates sub-project sites within 80-feet of the Rancho Encantada Parkway centerline, west of the proposed school/park site.

Facts in Support of Finding: Implementation of Mitigation Measures 4.7-1 and 4.1-2 of the final EIR would reduce potential noise impacts to below a level of significance. Mitigation would require a subsequent acoustical analysis be prepared by a qualified acoustician to identify noise control requirements on building and site plans, prior to issuance of building permits for potentially impacted dwelling units. If architectural features are needed to achieve the interior noise standard of 45 dBA CNEL, such features would be noted on the building plans for the sub-project site. In addition, a noise attenuation wall would be constructed along Rancho Encantada Parkway in the locations shown on Exhibit A and as specified in the acoustical analysis report attached as an appendix to the final EIR.

7. Air Quality

Significant Impact: Short-term fugitive dust (PM-10) impacts generated during construction activities and NO_x emissions generated from diesel powered construction equipment would be regarded as a significant direct impacts for both the Montecito and Sycamore Estates sub-projects.

Facts in Support of Finding: Implementation of Mitigation Measures 4.8-1 through 4.8-3 of the final EIR would mitigate the Project's direct short-term air quality impacts to below a level of significance. Mitigation would require City approval of an accelerated construction dust abatement management program and low NO_x tune-ups for all diesel-powered construction equipment.

8. Cultural Resources

Significant Impacts: No cultural resource sites are located on the Montecito sub-project site. Development of the Sycamore Estates sub-project would impact one potentially significant cultural resource site (CA-SDI-14027H).

Facts in Support in Finding: Potentially significant impacts to Site CA-SDI-14027H would be mitigated to below a level of significance by implementing a number of measures specified in the final EIR, including ensuring that a qualified archaeologist monitor the construction, temporarily halting construction upon the discovery of significant cultural resources, and permanently curating collected cultural materials.

9. Paleontological Resources

Significant Impact: Implementation of the proposed Project would have the potential for significant direct impacts to paleontological resources in areas proposed for grading underlain by the Stadium Conglomerate or Pomerado Conglomerate formation.

Facts in Support in Finding: Potential direct impacts would be mitigated below a level of significance by ensuring that a qualified paleontologist is on-site to monitor the initial cutting of undisturbed areas underlain by either the Stadium Conglomerate or Pomerado Conglomerate formation, diverting or halting construction activity in the area of discovery if fossil remains are found to allow recovery and curation of fossils, recordation of fossils at the San Diego Natural History Museum, and documenting findings in a report.

10. Public Services

Significant Impact: The Project would increase the population of the area, increasing the demand on public services and resulting in significant impacts to schools, parks, and fire protection services. The addition of students to the Poway Unified School District would result in a significant cumulative impact due to overcrowding. The Project's population would create a need for 8.05 acres of public parkland (2.46 acres attributable to the Montecito sub-project and 5.59 acres attributable to the Sycamore Estates sub-project). Because portions of the sycamore Estates sub-project site may be located outside of the six-minute response time goal from existing and planned fire stations, fire protection impacts would be considered significant.

Facts in Support of Finding: The Sycamore Estates sub-project would offer to convey an on-site elementary school site to the Poway Unified School District. In addition, and regardless of whether the on-site school site is developed, the owner/permittee is required to pay statutory Senate Bill 50 fees in place at the time of building permit issuance to reduce public school impacts to below a level of significance.

Impacts to public parks would be reduced to below a level of significance through the provision of an on-site 4.0-acre public park site adjacent to the proposed elementary school site. If the school site is not developed, the public park site would increase to 8.05 acres in size as specified by final EIR Mitigation Measure 4,11-2. If development of the

Sycamore Estates sub-project site is not assured through the recordation of a Final Map prior to the issuance of building permits for the Montecito sub-project, the Montecito sub-project owner/permittee would pay into the Rancho Encantada Public Facilities Financing Plan (PFFP) prior to the issuance of building permits to cover its 2.46-acre park requirement. This measure would mitigate the project's significant direct impact to public parks to below a level of significance.

To mitigate potential fire protection impacts to below a level of significance, a fire response time analysis would be conducted for each development phase. If a proposed structure is located outside of a six-minute response time area from an existing fire station, a fire sprinkler system would be installed in the structure satisfactory to the City Fire Marshall.

11. Public Safety

Significant Impact: Future residents of both the Montecito and Sycamore Estates sub-project sites would be exposed to electric and magnetic fields (EMF) from power lines within existing SDG&E easements. No hazardous materials impacts would occur on the Montecito sub-project site. Existing septic systems, a diesel fuel tank and the six existing buildings located on the Sycamore Estates sub-project site are not hazardous, but the existence of these features represents a significant hazard potential. A significant hazard potential also exists at Cultural Resource Site CA-SDI-15159H, the site of a WWII era training airplane crash, where there is a remote possibility that some casings may still have functional primers.

Facts in Support of Finding: Due to the inconclusive nature of scientific data regarding the hazards of EMF, potential impacts are speculative in nature and are not regarded as significant. Implementation of Mitigation Measures 4.12-1 through 4.12-5 of the final EIR would fully mitigate the Sycamore Estates sub-project's significant hazard potential to below a level of significance. These measures include requiring the owner/permittee to remove the above ground diesel fuel tank and six existing buildings in the Sycamore Estates sub-project. The owner/permittee would also be required to take soil samples from septic systems, storm water run-off areas, and container storage areas and provide a written report of the results to the City of San Diego. A Phase II site assessment would also be conducted and implemented prior to the issuance of grading permits. Cultural Resource Site CA-SDI-15159H would be marked in the field and flagged for special grading precautions to reduce potential impacts associated with this site to below a level of significance.

12. Water Conservation

Significant Impact: The proposed Project would use approximately 600,000 gallons of water per day which is regarded as a significant direct water conservation impact.

Facts in Support of Finding: To reduce direct water conservation impacts to below a level of significance, the Project would use low water use plant species, group plants with similar water usage requirements, incorporate computerized irrigation systems in common irrigation areas, and use water conserving appliances in proposed structures.

B. SECTION 21081 (A)(2) FINDING

The decision maker, having independently reviewed and considered the information contained in the final EIR the appendices to the final EIR, and the Administrative Record, finds that there are changes or alterations that are within the responsibility and jurisdiction of another public agency and have been, or can and should be, adopted by that other agency.

1. Biological Resources

Significant Impact: Implementation of the gravity sewer design option would cause significant direct impacts to 0.08-acre of wetland habitat, 0.3-acre of coast live oak woodland, 0.1-acre of Diegan coastal sage scrub, and 0.1-acre of non-native grassland, which are considered sensitive habitats within the City of Poway.

Facts in Support of Finding: Mitigation for impacts to upland and wetland vegetation communities due to construction of the off-site gravity sewer line would consist of creation of 0.9 acres of coast live oak woodland and preservation of 0.3 acres of other upland vegetation satisfactory to the City of Poway. Mitigation for impacts to wetlands would consist of restoring the ground surface of the sewer line alignment to its original condition prior to sewer line installation. All wetland mitigation would be contingent upon state and federal resource agency approval and in accordance with City of Poway requirements. All impacts to wetlands must be mitigated "in-kind" and achieve "no-net-loss" of wetland function and values.

2. Geology/Soils

Significant Impact: Due to the presence of soils with high erosion potential, construction of the gravity sewer line could potentially result in significant short-term erosion and sedimentation impacts.

Facts in Support of Finding: Erosion impacts would be mitigated to below a level of significance by the provision of sediment and erosion control measures contained in the City of Poway Grading Ordinance (City of Poway Municipal Code, Title 16, Division III).

3. Hydrology/Water Quality

Significant Impact: Portions of the gravity sewer alignment are located in the mapped 100-year floodplain of Beeler Creek. Significant direct short-term water quality impacts would occur during construction.

Facts in Support of Finding: Construction of the gravity sewer line would conform to the National Flood Insurance requirements and local ordinance. Construction would adhere to NPDES Permit No. CA 0108758 and a NPDES permit would be obtained from the State Water Quality Control Board pursuant to Poway Municipal Code, Chapter 13.09.

4. Air Quality

Significant Impact: Short-term fugitive dust (PM-10) impacts generated during construction activities would be regarded as a significant direct impact.

Facts in Support of Finding: Direct impacts would be mitigated to below a level of significance through an accelerated dust abatement management program.

5. Paleontological Resources

Significant Impact: Construction of the gravity sewer line would have the potential for significant direct impacts to paleontological resources in areas proposed for excavation.

Facts in Support in Finding: Potential direct impacts would be mitigated below a level of significance by ensuring that a qualified paleontologist is on-site to monitor areas of excavation, diverting or halting construction activity in the area of discovery if fossil remains are found to allow recovery of fossils, recordation and curation of fossils at the San Diego Natural History Museum or a facility designated by the City of Poway, and findings documented in a report.

C. SECTION 21081 (A)(3) FINDING

The City, having reviewed and considered the information contained in the final EIR, the appendices to the final EIR and the Administrative Record, finds, pursuant to CEQA, that the EIR considers a reasonable range of Project alternatives; and that specific economic, legal, technological, social, or other considerations including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR and its appendices.

1. Infeasibility of Mitigation for Significant Unmitigated Impacts

Land Use

Significant Impact: The Sycamore Estates sub-project would be inconsistent with the Industrial Element of the City of San Diego's Progress Guide and General Plan because of the rezone of the site from AR-1-1 (agricultural; formerly A-1-5 under the City's pre-2000 Municipal Code [CMC]), IL-3-1 (manufacturing; formerly M-1A), and IH-2-1 (manufacturing; formerly M-2A) to AR-1-1 (agricultural; formerly A-1-10). The Industrial Element of the General Plan calls for the protection of manufacturing lands from encroachment by non-manufacturing uses.

Facts in Support of Finding: No mitigation measures have been identified to lessen this land use impact to below a level of significance while still achieving the Project's goals and objectives. Natural resource (mineral resource extraction) impacts due to inconsistency with the Industrial Element could be fully eliminated by selection of the Mineral Resource Extraction Alternative.

Landform/Visual Quality

Significant Impact: Construction of the proposed sub-projects, when considered with other current and future uses and development in the Beeler Canyon area, would contribute to the alteration of the landform and visual character of the area from that of natural vegetation and topography to artificial landforms and human-made structures, landscaping and uses. These impacts are considered significant on a direct and cumulative level.

Facts in Support of Finding: Numerous manufactured slopes identified on Exhibit A (Montecito and Sycamore Estates VTMs/PRDs) would be contour graded, and all manufactured slopes would be revegetated. These measures, however, would not reduce landform and visual quality impacts to below a level of significance. No other measures have been identified to lessen landform/visual quality impacts to below a level of significance.

Biological Resources

Significant Impact: Implementation of the Project would result in cumulatively significant loss of foraging habitat for the White-tailed kite, Cooper's hawk, Northern harrier and other raptors.

Facts in Support of Finding: Reduction of cumulative impacts to raptor foraging habitat would be partially met in conjunction with the coastal sage scrub and grassland habitat mitigation described above in Section A under "Biological Resources;" however, these measures would not fully mitigate the cumulative impact. No other mitigation measures have been identified to further lessen this impact to below a level of significance.

Hydrology/Water Quality

Significant Impact: Significant cumulative water quality impacts (urban pollutants) would occur to Beeler Creek and Penasquitos Lagoon due to the introduction of urban uses and impervious surface areas to the site.

Facts in Support of Finding: Significant direct impacts would be reduced to below a level of significance by implementation of a Stormwater Pollution Prevention Plan (SWPPP) in compliance with the National Pollutant Discharge Elimination System (NPDES) General Permit that contains permanent post-construction BMPs to control the rate, volume and quality of runoff leaving the site. No mitigation is available at the project level to fully mitigate cumulative water quality impacts.

Transportation

Significant Impact: The proposed Montecito and Sycamore Estates sub-project would create cumulative impacts on Pomerado Road street segments from I-15 to Creek Road. Cumulative impacts would occur at the intersections of Pomerado Road with Scripps Poway Parkway, Willow Creek, and Scripps Ranch Boulevard, and direct impacts would occur at the intersections of Pomerado Road with Scripps Ranch Boulevard and the I-15 northbound off-ramp.

Facts in Support of Finding: No mitigation measures are available to eliminate transportation impacts on Pomerado Road. Other transportation impacts would be mitigated by assuring the construction of the transportation improvements identified in final EIR Section 4.6, prior to recordation of the first final map. The improvements identified in EIR Section 4.6 would be assured through deferred improvement agreements or by permit and bond.

Air Quality

Significant Impact: When considered with other projects in the area, implementation of the Project would contribute to the non-attainment of clean air standards in the San Diego Air Basin due to an increase in emissions impacts associated with Ozone (O₃). The Project's incremental contribution is considered a cumulatively significant air quality impact.

Facts in Support of Finding: Because the only mitigation available would be the successful county-wide implementation of the San Diego Air Pollution Control District Regional Air Quality Strategies (RAQS), no mitigation is possible at the project level to reduce this impact to below a level of significance.

Paleontological Resources

Significant Impact: Grading performed during Project construction would impact soils with high paleontological resource sensitivity ratings, resulting in potentially significant cumulative impacts. Because paleontological resources are a non-renewable resource, any loss of these resources when considered in combination with losses from other development in the region, would contribute to a cumulatively significant impact.

Facts in Support of Finding: Although direct impacts would be fully mitigated through paleontological monitoring, diverting or halting construction activity in the area of discovery if fossil remains are found to allow recovery of fossils, recordation and curation of fossils at the San Diego Natural History Museum, and documenting findings in a report, no measures are available to reduce cumulative impacts to below a level of significance.

Public Services

Significant Impact: When considered in combination with other existing and proposed developments, cumulative impacts on landfill capacity and waste management services would be regarded as significant.

Facts in Support of Finding: Mitigation Measure 4.11-5 of the final EIR requires the owner/permittee to implement waste-reduction programs during construction and operational activities. These programs would reduce, but not fully mitigate, the Project's cumulative impact.

Water Conservation

Significant Impact: The proposed Project would use approximately 600,000 gallons of water per day which, when considered in combination with other existing and planned development in the area, is regarded as a significant cumulative water conservation impact.

Facts in Support of Finding: The Project would use low water use plant species, group plants with similar water usage requirements, incorporate computerized irrigation systems for common irrigation areas, and use water conserving appliances in proposed structures. Although these measures would reduce direct water conservation impacts to below a level of significance, no measures are available to fully mitigate the impact on a cumulative level.

Natural Resources

Significant Impact: Because a majority of the project site is mapped by the California Department of Mines and Geology as a regionally significant mineral resource area, the preclusion of mining opportunity on the site is regarded as a potentially significant cumulative impact.

Facts in Support of Finding: No measures are available to reduce this impact. The impact could be fully eliminated by selection of the Mineral Resource Extraction Alternative.

2. Infeasibility of Project Alternatives to Reduce or Avoid Significant Impacts

The EIR for the Rancho Encantada Project examined several project alternatives, as well as two no project alternatives.

No Project - Existing Zoning Alternative

Project Description: The No Project - Existing Zoning Alternative represents a reduction of 498 residential units, the introduction of manufacturing/industrial use areas to the site, and a decrease of approximately 122 acres of graded area. Existing manufacturing/industrial uses on the Sycamore Estates sub-project site would be retained and included as part of the development. The Montecito sub-project site would develop

the same number of residential units as the proposed Project. However, lot sizes would be reduced and limited to a graded area of 92 acres. An 8.4-acre MHPA boundary adjustment would occur on the Montecito sub-project site, and approximately 186 acres of the sub-project site would be preserved as natural open space. The Sycamore Estates sub-project site would develop up to 174 residential units and approximately 222 acres of the sub-project site would be developed with manufacturing/industrial uses. Five existing industrial use areas also would be retained on the Sycamore Estates sub-project site under this Alternative. Industrial areas would be graded to include large, flat pads necessary to accommodate large buildings and parking areas. Approximately 529 acres of the Sycamore Estates sub-project site would be graded or disturbed. Rancho Encantada Parkway would serve as the primary on-site roadway and would be bridged in one location. Beeler Canyon Road would be improved to an Industrial Collector along its length to accommodate traffic increases, including additional truck traffic.

Significant Impact: The No Project-Existing Zoning Alternative would avoid direct impacts associated with land use (conflict with Industrial Element of the Progress Guide and General Plan) by developing the Sycamore Estates sub-project site under its existing industrial zones. Direct impacts associated with landform /visual quality (Montecito only), biological resources, geology/erosion, paleontological resources, transportation (Montecito only), and public services (Montecito only) would be lessened as compared to the proposed Project. In addition, the Project's contribution to cumulative impacts associated with landform/visual quality (Montecito only), biological resources/raptor foraging habitat, hydrology/water quality and paleontological resources would be lessened as compared with the proposed Project. The Sycamore Estates sub-project under this alternative would result in increased significant direct and cumulative impacts to landform/visual quality, transportation, noise, air quality, hydrology/water quality and water conservation.

Facts in Support of Finding: Development under The No Project – Existing Zoning Alternative is rejected as infeasible because it would not provide the housing that is needed to meet current as well as projected future growth demands within the City. The total number of dwelling units under this alternative would be decreased by 489 homes. This alternative also is infeasible because it would not provide for a public park and an elementary school which is identified as a Project objective. In addition, absorption of the 222 acres of industrial/manufacturing uses would significantly extend the construction period resulting in a delay and probable decrease in annual property tax revenues to the City. Development of the No Project - Existing Zoning alternative also is infeasible because it would result in elimination of an affordable housing component, which means the City would not attain its goals for providing affordable housing on this site nor would the City obtain a contribution to the low-income housing fund, which funds could be used to increase the supply of low-income housing within the City.

No Project - Mineral Resource Extraction Alternative

Project Description: Under the No Project - Mineral Resources Extraction Alternative, a reduction of 664 residential units, the introduction of aggregate mining to the site, and an increase of approximately 227 acres of graded area would occur. The Montecito sub-project site would be developed as described in the NO PROJECT – EXISTING ZONING ALTERNATIVE, except that residential development areas would be pulled back from the adjacent mining area and would be slightly expanded in the southwestern portion of the property. In total, 122.5 acres of the Montecito sub-project site would be graded under this Alternative. This Alternative considers the establishment of a resource extraction operation on approximately 847.5 acres of the Sycamore Estates sub-project site. Because ultimate end-use of the site after reclamation would be speculative, this Alternative only evaluates potential impacts of the mining operation. It is assumed that mining, material processing and batching activities would disturb approximately 250 acres at any given time, over a period of approximately 75 years. The quarry would be excavated to a depth of approximately 400 feet, with material mined by heavy equipment and transported by off-road dump haul trucks to stockpile areas and a processing plant. Reclamation would be conducted to comply with reclamation standards required by the Surface Mining and Reclamation Act (SMARA). Reclamation of the site would be undertaken in phases, occurring as each mining phase is completed. As portions of the site are mined to finished grade, reclamation and revegetation of the slopes and subsequent development of the site would be undertaken.

Significant Impact: The No Project-Mineral Resource Extraction Alternative would avoid significant cumulative impacts to natural (aggregate) resources. The Sycamore Estates sub-project site would result in reduced impacts to public services and water conservation, and increased impacts to landform alteration (direct and cumulative), biological resources (cumulative), geology/erosion (direct), hydrology/water quality (direct and cumulative), transportation (direct and cumulative), noise (direct), air quality (cumulative), paleontological resources (cumulative) and public safety as compared to the proposed Project. On the Montecito sub-project site, direct impacts associated with landform /visual quality, biological resources, geology/erosion, paleontological resources, transportation , and public services would be lessened as compared to the proposed Project. In addition, Montecito’s contribution to cumulative impacts associated with landform/visual quality, biological resources/raptor foraging habitat, hydrology/water quality and paleontological resources would be lessened as compared with the proposed Project.

Facts in Support of Finding: Development under The No Project – Mineral Resource Extraction Alternative is rejected as infeasible because it would not provide the housing that is needed to meet current as well as projected future growth demands within the City. The total number of dwelling units under this alternative would be decreased by 664 homes. This reduction would make the project infeasible because it would not provide for an economically viable, diverse and high-quality residential development. This alternative also is infeasible because it would not provide for a public park and an elementary school which is an objective of the proposed Project, and would not provide for dedication of the existing buildings east of Planning Area 11 to the City. In addition, the mining of aggregate on up to 847.5 acres for a period of up to 75 years would

significantly delay and decrease annual property tax revenues to the City. Development of the No Project -- Mineral Resource Extraction alternative also is infeasible because it would result in elimination of an affordable housing component, which means the City would not attain its goals for providing affordable housing nor would the City obtain a contribution to the low-income housing fund, which funds could be used to increase the supply of low-income housing within the City. In addition, this project would place a significantly increased traffic burden on local and regional streets as a result of the need to accommodate up to approximately 540 daily haul trips over an approximate 6-hour period in order to conduct a mineral resource extraction operation. These truck trips also would result in major impacts to street surfaces, requiring additional, costly annual maintenance.

Reduced Project Alternative

Project Description: The Reduced Project Alternative considers reducing the development footprint of the proposed Project. The Montecito sub-project site would be developed with the same number of residential units as the proposed Project, but would impact less of the site by clustering development into one smaller, more compact planning area located adjacent to Pomerado Road. In total, 277 units would be constructed on a development pad of approximately 36 net acres. Residential product type could include apartments, townhomes, condominiums, or small lot detached units (average density: 8.1 du/ac). The one existing single-family residence would be retained in its existing location. Approximately 50.9 acres of the Montecito sub-project site would be graded under this Alternative. The Sycamore Estates sub-project site would be rezoned to AR-1-1 and its development footprint and residential unit count would be reduced to 481 residential units, including 404 single-family units and 77 affordable housing units. A 16-acre school park site also would occur in a similar fashion as the proposed Project. Access would be provided via a loop road, with two main access points on Beeler Canyon Road. Approximately 349.8 acres of the Sycamore Estates sub-project site would be graded under this Alternative.

Significant Impact: The Reduced Project Alternative would provide a proportionate reduction in the amount and severity of significant direct impacts associated with landform/visual quality, biological resources, hydrology/water quality, transportation, geology/erosion, noise, air quality, cultural resources, paleontological resources, public services and water conservation. This Alternative also would reduce cumulative impacts associated with landform/visual quality, biological resources (foraging habitat), hydrology/water quality, transportation, air quality, paleontological resources, public services (landfill capacity) and water conservation. There would be no change in impacts associated with public safety and natural resources. The Reduced Project Alternative would have increased significant but mitigable impacts associated with traffic and noise along Beeler Canyon Road and fire protection on the project site.

Facts in Support of Finding: Development under the Reduced Project Alternative is rejected as infeasible because the area for development would be greatly restricted and appropriate access eliminated. Under the Reduced Project Alternative the development area would be reduced by over 342 acres and 233 fewer homes would be constructed. Recreational resource impacts would be adverse for the Montecito sub-project, because

the park on Sycamore Estates could not be accessed within ½-mile driving distance. In addition, this alternative would not realize the benefit of the proposed MHPA boundary adjustment, thus decreasing habitat-saving advantages. The Reduced Project Alternative dwelling unit reduction also would not provide for a viable development and would not provide for a diverse and high-quality development. Development of this alternative also would lessen the number of on-site affordable housing units by 35 units, which means the City would not attain its goals for providing affordable housing in the same manner as the Proposed Project.

Reduced Grading Alternative

Project Description: The Montecito and Sycamore Estates sub-project sites would be developed with large, custom home sites. Rural, private roadways and driveways would occur internal to the project site to provide access to the lots. For purposes of this Alternative, it is assumed that multiple access points would be established at Beeler Canyon Road and one at Pomerado Road. For purposes of analysis of this Alternative, it is assumed that a maximum of 50 percent of the lot area would be disturbed by grading and construction of the custom homes, and associated private yards and driveways. In many cases, homes would likely be sited on the flattest portion of the lot or would be built into the hillside. If sited near the rear of the lot, long, steep driveways may be necessary, as would the provision of culverts over drainages in some areas along the canyon bottoms. If this Alternative were to be implemented, actual impacts would be assessed on a lot-by-lot basis at the time application was made to develop each custom home site. On the Montecito sub-project site, 114 homes would be built on approximately 165.2 disturbed acres of the site. On the Sycamore Estates sub-project site 429 rural residential lots would be built on approximately 458 disturbed acres of the site.

Significant Impact: The Reduced Grading Alternative would avoid significant direct landform alteration and cultural resources impacts. This alternative also would lessen significant impacts associated with biological resources, visual quality, geology (erosion), hydrology/water quality, traffic, noise, air quality, paleontological resources and water conservation, but not to below a level of significance. Compared to the proposed project, cumulative impacts associated with visual quality/landform alteration, hydrology/water quality, traffic, air quality, paleontological resources, public services (landfill capacity) and water conservation would be reduced, but also not to below a level of significance. Significant direct impacts to public safety would occur, but would be mitigable, and natural resources (aggregate) and cumulative impacts to biological resources (loss of raptor foraging habitat) would be significant and unmitigable. Fire protection impacts may be increased as compared to the proposed project, but would be mitigable.

Facts in Support of Finding: Development under the Reduced Grading Alternative is rejected as infeasible because no affordable housing, school or park site would be provided, thus causing the City to fail to meet its affordable housing goals in this area and to significantly reduce recreational opportunities, as well as increase travel miles to school and recreational facilities. In addition, the alternative would not provide for the existing buildings east of Planning Area 11 to be conveyed to the City. Moreover, due to the custom lot design, homes would be priced above that normally charged for homes in standard subdivision developments, further worsening the affordability of San Diego's

available housing stock. The Reduced Project Alternative is further infeasible because, under this alternative, the project's objective of locating development on the least environmentally sensitive portions of the site would not be achieved either, resulting in an increase in significant environmental impacts. In addition, viability of portions of the adjacent MSCP land would be threatened by the residential development's (domestic pets and humans) proximity to the open space.

RPO Consistent Alternative

Project Description: The purpose of this Alternative is to comply with the strict application of RPO through avoiding impacts to wetlands and reducing hillside encroachment on the Montecito sub-project site to that which would be permitted by RPO on a parcel-only basis. Total density for this Alternative would be 606 dwelling units as compared to 941 for the proposed Project. The Montecito sub-project site would be developed similar to that of the proposed Project, but a 61-acre reduction in graded area would occur. In total, 144 dwelling units would be built on the Montecito sub-project site under this Alternative. The proposed Sycamore Estates' 0.53-acre wetland impact is primarily caused by the placement of detention basins in the sub-project site's westerly drainage course. To eliminate the need for detention basins in this area, all development in Sycamore Estates' drainage basin 800 would be eliminated. Except for a segment of Rancho Encantada Parkway and an existing industrial use area that would be developed with institutional uses, Drainage Basin 800 would be preserved in open space and development would be shifted easterly. Grading would occur on 440 acres of the Sycamore Estates sub-project site, accommodating 462 dwelling units and school and park site.

Significant Impact: The RPO Consistent Alternative would avoid impacts to wetlands and important cultural resources. Grading of steep natural hillsides would occur, but impacts would be less than that permitted by RPO. This alternative would reduce impacts associated with visual quality/landform alteration, biological resources, hydrology/water quality, traffic, noise, air quality, paleontological resources, public services (landfill capacity), and water conservation, but not to below a level of significance. The RPO Consistent Alternative would also reduce cumulatively significant impacts associated with visual quality/landform alteration, water quality, transportation, air quality, paleontological resources, public services (landfill capacity), biological resources (loss of raptor foraging habitat), and water conservation, but not to below a level of significance.

Facts in Support of Finding: Development under the RPO Consistent Alternative is rejected as infeasible because the decrease in the provision of 278 dwelling units and the need to construct a 450-foot long bridge on Rancho Encantada Parkway would create a project that would not be economically viable. Also, this alternative would not provide for the conveyance of existing buildings east of Planning Area 11 to the City. Development of this alternative also would significantly reduce the affordable housing component, which means the City would not attain its goals for providing affordable housing in the same manner as the Proposed Project. Given the reduction in the total number of residential dwelling units, the development potential of the site would not be

achieved as permitted under Council Policy 600-29, and a portion of the property could be subject to a future Phase Shift by a majority vote of people.

Statement of Overriding Considerations

The City Council, pursuant to Public Resources Code Section 21081(b) and State CEQA Guidelines Section 15093, having reviewed and considered the information contained in the final EIR, the appendices to the final EIR and the Administrative Record, and having balanced the benefits of the proposed Rancho Encantada project against its unavoidable environmental impacts, finds that the remaining significant effects are acceptable due to the following overriding considerations:

- a. Approximately 1,597 acres within Rancho Encantada of undeveloped land which has been identified by the City to be included in the Multi-Habitat Planning Area ("MHPA") of the City's Multiple Species Conservation Program ("MSCP") would be conveyed to the City for preservation as open space. In addition, the Project would convey title to an additional 348.3 acres which would expand the City's MHPA by 348.3 acres. Approximately 76 acres of Diegan coastal sage scrub lies within the 348.3 acre area. Coastal sage scrub is habitat that can be utilized by the federally listed threatened California gnatcatcher. MHPA areas would be dedicated to the City of San Diego and/or covered by a conservation easement to ensure permanent preservation.
- b. Approximately 75 percent of the Rancho Encantada project site (1,989.2 acres) would be preserved as open space, including MHPA open space, project open space, and revegetated slopes. The Montecito sub-project would preserve approximately 120.7 acres of open space and the Sycamore Estates sub-project would preserve approximately 1,620 acres of open space.
- c. Two wildlife corridors would be preserved on the Rancho Encantada project site. The Beeler Canyon east-west trending wildlife corridor is located along the northern portion of the sub-project sites and connects undeveloped habitats in the east, forming one of the few remaining east-west wildlife corridors in central San Diego County. Sycamore Canyon, a north-south trending wildlife corridor, runs along the eastern portion of the Sycamore Estates sub-project site. Combined, the preservation of these wildlife corridors would provide significant improvements over the existing MHPA for wildlife movements.
- d. The Project would provide an extension of the public trail system and improve the on-site trail system. The on-site trail system would connect with trails on the adjacent Sycamore Canyon County Open Space Preserve/Gooden Ranch, and to trails in the City of Poway. All public trail locations would be approved by the City of San Diego in compliance with the MSCP General Management Directives for trail design and maintenance.
- e. Sycamore Estates would contribute to the City a cash payment in excess of \$1,500,000 for public improvements. Eighty percent (80%) of the \$1,500,000 would be utilized by the City for the sole purpose of funding improvements to Mission Trails Regional Park and twenty percent (20%) of the \$1,500,000 would be utilized by the City for use within the Kearney Mesa community.

- f. Sycamore Estates would convey to the City approximately 50 acres of property which includes approximately 35,000 square feet of existing buildings. The City would at its sole and exclusive election determine which of the several buildings City desires to retain for City purposes.
- g. Sycamore Estates would deposit with the City a cash payment totaling \$265,000 to establish an endowment fund for the initial and long-term maintenance of conserved property within Sycamore Estates.
- h. An increase in the number of residential homes available in the City of San Diego is vital to meet the growth demands in the City. The Project would provide 940 new residences, including 834 single-family homes and 106 affordable multi-family housing units. The development of affordable housing on the site would contribute to the City of San Diego's share of meeting regional inclusionary housing needs.
- i. The Project would generate temporary construction jobs, as well as permanent jobs in the proposed elementary school.
- j. Project residents and visitors would use commercial, industrial, manufacturing, and other services and businesses in the City. This increased business would translate into increased tax revenues for the nearby communities and the City.
- k. An on-site park consisting of a minimum of 4.0 net acres would be constructed on the Sycamore Estates sub-project site and would be conveyed to the City of San Diego. This park site would contribute to the City's public park inventory.
- l. The Rancho Encantada project would assist in various transportation improvements on Pomerado Road, Stonemill Drive, Scripps Poway Parkway, Spring Canyon Road, the northbound I-15 off-ramp at Pomerado Road, and the southbound auxiliary lane on I-15 from Mira Mesa Blvd. to Miramar Way. These street improvements would assist in improving the operating conditions at these locations to the benefit of all who use these transportation facilities.