



Land Development
Review Division
(619) 236-6460

BINDER

MASTER
Environmental Impact Report

LDR No. 96-7918
SCH No. 97111077

SUBJECT: PACIFIC HIGHLANDS RANCH (SUBAREA III) SUBAREA PLAN in the NORTH CITY FUTURE URBANIZING AREA (NCFUA). GENERAL PLAN AMENDMENT, NCFUA FRAMEWORK PLAN AMENDMENT, SUBAREA PLAN, MASTER REZONE, MULTIPLE HABITAT PLANNING AREA (MHPA) BOUNDARY ADJUSTMENT, DEVELOPMENT AGREEMENT, and LOCAL COASTAL PLAN AMENDMENT to develop 4,974 residential units (with potential increases up to 5,456 units depending on the need for school facilities and concomitant redesignation of school sites to residential uses); a Town Center with commercial, park, open space, residential and civic area components; elementary, junior high, and high schools; a ~~police substation~~ double fire station; a library; and associated public facilities and transportation network on approximately 2,652 acres. Pacific Highlands Ranch (Subarea III) is located within the NCFUA, and abuts the northerly limits of the Rancho Peñasquitos community and Black Mountain Park. Del Mar Mesa (Subarea V) and Carmel Valley are to the south, Subarea IV is to the east, Subarea II is to the west, and Fairbanks Ranch and La Zanja Canyon are to the north. The project area includes portions of Del Mar Mesa, McGonigle Canyon, Deer Canyon, Black Mountain Road, and the proposed State Route 56 freeway corridor (portions of Sections 7,8,9,10,11,15,16, and 22, Range 3 West, Township 14 South, Del Mar Quadrangle, San Bernardino Base Map). Applicant : Pardee Construction Company.

CONCLUSIONS:

Note: Subsequent to the preparation of the Draft MEIR, the Pacific Highlands Ranch Subarea Plan was revised. The revisions are considered minor in scope and do not affect the environmental analysis or conclusions of the Draft MEIR as previously presented. Changes to the document are shown in strikeout/underline format.

The proposed Pacific Highlands Ranch Subarea Plan comprises the City of San Diego's statement of policy for growth and development of the Subarea III planning area, one of five subareas designated by the North City Future Urbanizing Area (NCFUA) Framework Plan. The Pacific Highlands Ranch plan proposes a land use plan and an open space system in general compliance with the requirements of the

Framework Plan for the NCFUA and the City of San Diego's Multiple Species Conservation Program (MSCP).

This Master Environmental Impact Report (MEIR) analyzes two separate land use plans developed around the two proposed northern alignments for the middle segment of State Route (SR) 56. The proposed Subarea 1 Plan incorporates the proposed SR-56 Alignment "F" and the proposed Subarea 2 Plan includes the proposed SR-56 Alignment "D," as described in the SR-56 revised EIR prepared by the City of San Diego. (It is anticipated that the SR-56 project will go to public hearing in late spring or early summer of 1998.) A Resource Protection Ordinance (RPO) analysis and Council Policy 600-40 development suitability analysis have been prepared for both subarea plans.

Subarea Plan 1 (SR-56 Alignment "F")

The majority of development as proposed by this subarea plan would occur north of the SR-56 alignment. Plan 1 would include a 33-acre ~~Town Center and Village~~ area consisting of commercial and retail uses and high density residential; a 20-acre employment center, 152 acres for three elementary schools, one junior high and an optional junior high school, and two high schools (one private and one public); a 24-acre park site; a 6 5-acre ~~town green civic use area~~ with a library; a 1,280-1,268-acre Multi Habitat Planning Area (MHPA); 203 acres for SR-56 and major roads; 12 acres of Very Low Density Residential (0.25-1 dwelling unit per acre); 544 acres of Low Density Residential (2.5-5 dwelling units per acre); 143 acres of Peripheral Residential (5.1-9 dwelling units per acre); and 60 acres of Core Residential (9.1-14 dwelling units per acre); and 33 acres of ~~Town Center Village~~ (34 dwelling units per acre). Existing or approved projects account for 175 acres within the planning area.

The number of new residential units would be 4,974. This number could increase to a maximum of 5,456 if the private school site does not develop as a school, and if it is determined that a junior high and a ~~fourth~~ ^{third} elementary school are not needed, and if these sites are redesignated for residential use. The major circulation element roads would consist of Carmel Valley Road, Del Mar Heights Road, Camino Santa Fe, and the SR-56 Alignment "F" freeway corridor. The development and grading for Subarea Plan 1 would cover approximately 50 percent of the 2,652-acre subarea. The remaining acreage would be an open space preserve, including a trail system, which is functionally equivalent to the Multiple Habitat Planning Area (MHPA) shown in the City of San Diego's MSCP Subarea Plan.

Subarea Plan 2 (SR-56 Alignment "D")

The SR-56 alignment shown on this subarea plan traverses the subarea in a diagonal manner, roughly bisecting the proposed development area, with most of the higher density uses occurring on the south side of SR-56. Subarea Plan 2 would include a 32-33-acre ~~Town Center Village~~ with the same uses as described in Subarea Plan 1; a 16-acre employment center; 154 acres for three elementary schools, one junior high and an optional junior high school, and one public and one private high school; 30 acres for park sites; a 6 5-acre ~~town green civic use area~~ with a library and; a 1,298-1,266-acre MHPA; 190 205 acres for SR-56 and major roads; 12 acres of Very Low Density Residential; 535 acres of Low Density Residential; 147 acres of Peripheral Residential; 55 acres of Core Residential; and 32 33 acres of Town Center Village.

The number of new residential units would be the same as for Subarea Plan 1, with a potential increase to a maximum of 5,414 units resulting from the redesignation scenario described above. The major circulation element roads would include Carmel

Valley Road, Del Mar Heights Road, Camino Santa Fe, and the SR-56 Alignment "D" freeway corridor.

Multiple Species Conservation Program (MSCP)

The City of San Diego adopted the MSCP on March 18, 1997. The MSCP is designed to conserve a connected system of biologically viable habitat lands in a manner that maximizes the protection of sensitive species and precludes the need for future listings of species as threatened or endangered. These targeted habitat lands are identified in the City's MSCP Subarea Plan as Multiple Habitat Planning Areas (MHPAs).

Approximately 1,510 acres of Pacific Highlands Ranch lies within the City of San Diego MHPA Northern Area. In order to implement the proposed subarea plan, some encroachment into the MHPA would be necessary; therefore, an MHPA Boundary Adjustment is proposed by the applicant. This action would amend the City's MHPA to add high quality habitats located in Carmel Valley Neighborhood 8A and Subarea V of the NCFUA into the preserve system; remove other less sensitive areas within Pacific Highlands Ranch and Carmel Valley Neighborhood 10; and confer Third Party Beneficiary Status on the applicant. The proposed adjusted MHPA would be functionally equivalent or superior to the adopted MHPA. The analysis to support this conclusion is provided in this MEIR in the Land Use and Biological Resource sections.

SIGNIFICANT UNAVOIDABLE IMPACTS:

Implementation of the Pacific Highlands Ranch Subarea Plan would ultimately result in unavoidable significant land use impacts in the form of inconsistencies with the RPO development regulations regarding the preservation of important cultural resources and wetlands; and the General Plan goals of retention of premium agriculturally productive lands in agricultural use and development of a transportation system that is in balance with the types and intensities of land uses that it serves; and the NCFUA Framework Plan guiding principle of designing and constructing the NCFUA transportation system so that it will not result in severe impacts to adjoining communities. Traffic resulting from the implementation of the subarea plan would result in direct and cumulative impacts on the I-5 and I-15 freeways and on road segments and intersections within and outside of the subarea. Implementation of the plan would result in unavoidable significant cumulative impacts to wetlands and native grasslands. Unavoidable significant cumulative downstream water quality impacts would occur as a result of additional impermeable surfaces and urban runoff. An unavoidable significant direct and cumulative change in the landform and visual character of the subarea would also occur. The visual character of the area would substantially change with implementation of the Plan, as the current very low intensity of rural, residential, and agricultural uses would be replaced with a maximum of 5,456 new dwelling units with associated infrastructure and commercial and civic uses. The project would result in the significant cumulative loss of important, non-renewable cultural resources. Unavoidable significant cumulative air quality impacts would occur as a result of the additional traffic on circulation element roadways and SR-56. Unavoidable significant direct and cumulative impacts to important agricultural land and cumulative impacts to the ability to extract mineral resources in the region would occur due to the development of agricultural land and land containing valuable mineral resources. Adoption of the No Project alternative would avoid the above significant direct and cumulative impacts resulting from implementation of the subarea plan.

SIGNIFICANT IMPACTS LIKELY TO BE MITIGATED WITH FUTURE PROJECT LEVEL REVIEW THROUGH THE PACIFIC HIGHLANDS RANCH SUBAREA PLAN (SUBAREA III) MITIGATION, MONITORING AND REPORTING PROGRAM:

The Pacific Highlands Ranch Subarea Plan is a planning document containing both policy and regulations and is intended to be the City's statement of policy for growth and development of the subarea. The analysis of environmental impacts is consistent with this level of planning. This EIR builds on the previously certified EIR for the Framework Plan and provides the basis for review and analysis of future projects within the subarea. Potentially significant impacts are identified; and a framework for future impact analysis and mitigation is a Mitigation, Monitoring and Reporting Program (MMRP) are provided. ~~Identified mitigation measures~~ Implementation of the MMRP will be required of future projects. It is expected that the following significant impacts could be lessened and/or fully mitigated with implementation of the ~~identified mitigation measures~~ MMRP.

Transportation/Traffic Circulation: Direct and cumulative impacts to freeways, intersections and roadway segments as a result of development.

Biological Resources: Direct, indirect, and cumulative impacts to upland habitats and sensitive species including up to 19.6 acres of Tier I habitats (southern maritime chaparral and native grasslands); 21.7 acres of Tier II habitats (coastal sage scrub and coyote brush scrub); 43.7 acres of Tier III habitats (chaparral and annual grasslands); 1.3 acres of wetlands; 14 sensitive plant species including California adolphia, Del Mar Manzanita, San Diego sagewort, Brewer's calandrinia, white coast ceanothus, prostrate spineflower, summer holly, western dichondra, coast barrel cactus, Palmer's grappellinghook, San Diego marsh-elder, San Diego golden star, Nuttal's scrub oak, and pygmy spikemoss; one pair of coastal California gnatcatchers, two orange-throated whiptail lizards, an undetermined number of grasshopper sparrow, southern California Rufous-crowned sparrow, Bell's sage sparrow, California horned lark, loggerhead shrike, Cooper's hawk, sharp-shinned hawk, turkey vulture, and white-tailed kite occurring within the area designated for development.

Hydrology/Water Quality: Direct impacts on flood control and urban runoff from development and on downstream water quality from increased impervious surface, erosion, sedimentation and pollutants.

Cultural Resources: Direct impacts to important significant cultural resources as a result of development.

Geology/Soils/Erosion: Direct impacts on development from ancient landslides, expansive soils, unstable cut slopes, alluvial soils, poorly consolidated soils, and seismic events. Direct and cumulative impacts from exposure of highly erodible soils through future grading.

Paleontological Resources: Impacts to significant fossil resources throughout the subarea as a result of future grading.

Noise: Direct noise impacts from future traffic.

Public Facilities and Services: Direct and cumulative school impacts from increased student population in districts where overcrowding already exists.

Direct impacts on the Fire Department's ability to provide a first response to an incident within six minutes.

Direct and cumulative impacts on the ability to provide water and sewer services to the subarea without substantial upgrade of existing systems.

Direct and cumulative solid waste impacts resulting from construction activities and approved development.

Public Safety: Direct impacts from pesticides and herbicides that may have been used for agricultural activities in areas designated for development.

Direct impacts from the potential for mosquito breeding in ponded water and detention basins.

ALTERNATIVES FOR SIGNIFICANT UNAVOIDABLE IMPACTS:

Four alternatives were developed which would reduce identified impacts on an individual and/or cumulative basis. The first alternative (Alternative Site Designs) contains two options and the third alternative (Development Without a Phase Shift) contains three options. These alternatives are briefly described below:

ALTERNATIVE SITE DESIGNS:

Two conceptual site designs were developed by City of San Diego staff. The designs adhere more closely to the land use concept described in the adopted NCFUA Framework Plan. Both designs include a similar number of dwelling units, a mixed use core area consisting of commercial uses, a community park, various residential densities, and a civic area; a high school, a fire station; a police substation; and the associated public facilities and transportation network. Both site designs also include moderately low residential densities (1.1-2 units per acre), which are not included in the proposed Pacific Highlands Ranch (Subarea III) Plan 1. Both of the site designs are very similar, with minor differences in the distribution of residential densities. Each of the designs would reduce direct and cumulative impacts to biological resources by including as open space the northern linkage to La Zanja Canyon in the northwest corner of the subarea and retaining the eastern on-site portions of Gonzales Canyon. However, the significant, unavoidable impacts to land use, wetlands, native grasslands, downstream water quality, landform and visual quality, cultural resources, air quality, agricultural lands and mineral resources would not be substantially reduced.

SR-56 CENTRAL ALIGNMENT ALTERNATIVE:

This alternative would include up to 5,500 residential dwelling units; a Town Center and Village area consisting of commercial uses, retail uses, a community green, high density residential, and a civic area; an employment center; three elementary schools; two neighborhood parks; a community park; one junior high and two high schools (one private and one public); a public library; a fire station; ~~a police substation~~; and the associated public facilities and transportation network. Development and grading for this alternative would cover approximately 50 percent of the 2,652-acre subarea. As the SR-56 central alignment would be incorporated, additional disturbance would be required to build the freeway south of the developed area.

Since the freeway would be separated from the community by open space, there would be a reduction in noise impacts to sensitive receptors, and an incremental reduction in air quality impacts due to the straighter alignment of SR-56 and correspondingly fewer miles traveled. The visual impacts associated with noise walls to reduce freeway noises would be almost entirely avoided. This alternative would affect only one important cultural resource site, as opposed to six sites for the proposed "D" alignment

of SR-56 and five sites for the "F" alignment. The central alignment alternative would reduce impacts to about 25 acres of potentially fossil bearing geologic formations.

Unavoidable significant cumulative impacts to air and water quality and cultural resources would remain. In addition, this alignment would impact a larger area of sensitive habitat than the other proposed alignments, and would fragment a portion of the MHPA.

DEVELOPMENT WITHOUT A PHASE SHIFT:

Three concept plans were proposed to address the development that could occur on the property without a phase shift from Future Urbanizing to Planned Urbanizing; that is, at the densities that are currently allowed by the underlying A-1-10 zone. The three non-phase shift scenarios are based on development of one unit per 4 acres on Pardee-owned land pursuant to Council Policy 600-29 and the Planned Residential Development regulations of the Municipal Code, and one unit per 10 acres on the other ownerships within the subarea, using three of the proposed SR-56 alignments (the "D," "F," and Central alignments). Each of the scenarios would result in 551 dwelling units, a golf course, driving range, clubhouse, and school park.

Each of the three concept plans could lessen the significant impacts to landform alteration and visual quality, as the Town Center, high school, employment center, and various residential densities of the proposed Pacific Highlands Ranch subarea plan would be replaced by a golf course and lower residential densities. The MSCP open space corridor in the northwestern corner of the site would be expanded with the elimination of the low-density development area. This alternative would reduce traffic generation from approximately 55,000-71,010 average daily traffic trips (ADTs) to about 6,660 ADTs. The demand on public services and utilities would be substantially lessened. Other mitigated impacts of the proposed project, including hydrology, cultural resources, geology, paleontology, air quality, noise, and public safety, would be further reduced by implementation of this alternative. However, cumulative water quality and air quality impacts, although reduced, would remain significant. In addition, adoption of any of the three no phase shift scenarios would result in potential significant land use impacts in that such development would be inconsistent with the NCFUA Framework Plan and possibly with RPO, as the community facilities required in the Framework Plan would not be provided, and the potential for impacts to wetlands and important cultural resources would remain. Also, the long-term MSCP preserve regional conservation benefits proposed by the Pacific Highlands Ranch project would not be realized.

RESOURCE PROTECTION ORDINANCE ALTERNATIVE:

This alternative would strictly comply with the encroachment provisions of RPO and eliminate the land use impact associated with the project's inconsistency with RPO. Wetland encroachment and impacts to important cultural sites would be avoided. The number of residential units would be reduced by approximately 50 percent. Because of the smaller development area, impacts in all issue areas would be significantly reduced, although not to below a level of significance in all instances. Aside from land use considerations, this alternative would be environmentally superior to the proposed project.

Unless project alternatives are adopted, project approval will require the decision-maker to make Findings, substantiated in the record, which state that: a) project alternatives are infeasible, and b) the overall project is acceptable despite significant impacts because of specific overriding considerations.

Lawrence C. Monserrate

Lawrence C. Monserrate
Environmental Review Manager
Development Services

April 3, 1998
Date of Draft Report

June 11, 1998
Date of Final Report

Analyst: Eileen Lower

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:

City of San Diego

Mayor Golding
Councilmember Mathis, District 1
Councilmember Warden, District 5
Development Services
Community and Economic Development
Fire and Life Safety Services
Police Department
Public Works

U.S. Government

U.S. Army Corps of Engineers
U.S. Fish and Wildlife Service
MCAS Miramar
Department of Agriculture

State of California

State Clearinghouse
Department of Fish and Game
CalTrans, District 11
Department of Health Services
Parks and Recreation Department
Resources Agency
Regional Water Quality Control Board
California Coastal Commission
Department of Water Resources
California Air Resources Board
Boating and Waterways
Native American Heritage Commission
Department of Conservation
State Lands Commission

County of San Diego

Agriculture Department
Air Pollution Control District
Department of Planning and Land Use

Environmental Services Unit
Department of Public Works
County Water Authority

Native Americans

Viejas Group of Capitan Grande Band of Mission Indians
Barona Group of Capitan Grande Band of Mission Indians
Mesa Grande Band of Mission Indians
Santa Ysabel Band of Diegueño Indians
San Pasqual Band of Mission Indians
Jamul Indian Village
Sycuan Band of Mission Indians
Clarence R. Brown, Sr.
Ron Christman
Louie Guassac

Others

City of Del Mar
City of Solana Beach
San Diego Association of Government (SANDAG)
Local Agency Formation Commission (LAFCO)
San Diego Transit Corporation
San Diego Gas & Electric Company
Metropolitan Transit Development Board
San Dieguito River Park JPA
Del Mar Union School District
Poway Unified School District
San Dieguito Union High School District
Solana Beach School District
University of California at San Diego Library
San Diego Association of Environmental Biologists
Sierra Club
San Diego Natural History Museum
San Diego Audubon Society
Environmental Health Coalition
California Native Plant Society
Stuart Hurlbert
San Diego Regulatory Alert
The SW Center for Biological Diversity
Citizens Coordinate for Century III
Endangered Habitats League
Park and Recreation Board
League of Women Voters
Dr. Florence Shipek
Vonn-Marie May
South Coastal Information Center
San Diego Historical Society
San Diego Museum of Man
Save Our Heritage Organization
San Diego County Archaeological Society, Inc.
San Diego State University
California Indian Legal Services
Los Peñasquitos Canyon Preserve Citizens Advisory Committee
Rancho Santa Fe Association
Carmel Valley Community Planning Board
Carmel Valley Trail Riders Coalition

Carmel Mountain Conservancy
Opal Trueblood
Rancho Peñasquitos Planning Board
Friends of Los Peñasquitos Canyon Preserve, Inc.
22nd District Agricultural Association
San Dieguito River Park Citizens Advisory Committee
Torrey Pines Community Planning Group
Fairbanks Ranch Association
Latitude 33
Pacific Business Development Group
Joel Fairbanks
Scott Sandstrom
San Diegans for Responsible Freeway Planning
Rancho Santa Fe Lakes HOA
Subarea III Property Owners
Pardee Construction Company

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 the comments do not address the accuracy or completeness of the environmental report. No response is necessary and the letters are attached at the end of the EIR.
- (X) Comments addressing the accuracy or completeness of the EIR were received during the public input period. The letters and responses follow.

**CITY OF SAN DIEGO
M E M O R A N D U M**

DATE: June 15, 1998

TO: Distribution

FROM: Lawrence C. Monserrate, Environmental Review Manager
Development Services

SUBJECT: Errata Sheet for Pacific Highlands Ranch (Subarea III) Subarea Plan
Final Master Environmental Impact Report (MEIR), LDR No. 96-7918

During the printing of the above-named document, the responses to comments number 322 through 368 (letter of comment from Robert D. Barczewski) were inadvertently misaligned. Attached is the letter with responses to comments appropriately placed. Development Services apologizes for any inconvenience.


LAWRENCE C. MONSERRATE

Attachment: Robert L. Barczewski letter of comment and City's responses

Distribution: Recipients of Final MEIR

Response

To: Mr. Lawrence C. Monserrate
Environmental Review Manager
City of San Diego
Development Services
Land Development Review Division
1222 First Avenue, Mail Station 501
San Diego, Ca. 92101

R E C E I V E D

MAY 10 1998

ENVIRONMENTAL ANALYSIS
SECTION

From: Mr. Robert D. Barczewski
Rancho Del Sol Nurseries, Inc.
Zero Energy Systems, Inc.
Trustee, Barczewski Family Trust
6561 Black Mountain Rd.
San Diego, Ca. 92130

Re: Subarea III phase shift, Draft MEIR

Dear Mr. Monserrate:

This will be my third response to the proposed phase shift of Subarea III by the applicant, Pardee Construction Company. Due to the extreme negative impact to Rancho Del Sol, the land owned by the Barczewski Family Trust, Robert D. Barczewski, Trustee (under Declaration of Trust dated 8/10/77), this written response is lengthy and many issues are addressed. Also included is a brief history of the land.

322 I attach herewith our previous correspondence, copies of the Rancho Del Sol PRD permit, Planning Commission Resolution, Tentative map, a memo from Cathy Winterrowd to Randi Coopersmith and other pertinent documents. Since the various open space easements, the EIR, my 4/85 application for a GPA (Zero Energy Project), State of California permits, Recorded Rancho Del Sol Subdivision map 12477 are voluminous and on file with the City I

322. The referenced background material does not address the adequacy of the MEIR, and has not been physically included in the final document. However, it is incorporated by reference into the final MEIR, and is on file (see LDR No. 35-0414) and available for public review at the offices of the Land Development Review Division, 1222 First Avenue, Fifth floor, San Diego, California 92101.

Response

will not include them here. Also my written comments to you on Route 56 will not be included here although I will be referring to them.

A brief history of Rancho Del Sol and the FUA follows:

The Mendiola family ran a fleet of Spanish galleons out of Mexico for a couple of hundred years and supplied Pueblo San Diego with arms, munitions and provisions. We are descendants through my mother Beatrice Mendiola. The "Jupiter Cannon" at Presidio Park was brought over by one of our ancestors. Therefore, the name of the street Caminita Mendiola.

Don Cordero, a retired soldier who was garrisoned at Pueblo San Diego was the first rancher (sheep, cattle, etc.) and eventually owned most of the area. Via a Mexican land grant he acquired this land, which included Del Mar. He managed to maintain a small part of his ownership after the Bear Flag Republic. After 1846 and the Gold Rush came the McGonigles, Neimans, Hampes, Zurchers, and others who dry farmed the land. In 1886 Old Black Mountain Road was established and became the dividing line of land ownership. Several of their descendents live locally and are active in the agriculture business. After W.W.II the Barczewski came back to San Diego from the Philippines after four years in Santa Tomas as POW's. Then came the Ukegawas (tomato growers), Collins (Evergreen Nursery) and myself (Rancho Del Sol and Nursery).

In 1962 a moratorium was created in the area. John F. Kennedy and Bobby Kennedy had the County place a moratorium on al property owned by the Teamsters Union (and others), who at that time was controlled by Jimmy Hoffa, and other lands owned by the Las Vegas group including Morris Shenker, etc. All this was done to stop the development from

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easterly Penasquitos to Del Mar. During this time the original alignment of Route 56 was established.

In 1964 the City of San Diego annexed the land and promised A-1-1 zoning. In 1971 easements were granted to the City of San Diego for the Del Mar 30" water line and the McGonigle canyon 18" sewer trunk.

In 1974 the City filed a general plan and placed a moratorium on the land, only allowing A-1-10. And denied A-1-1. Around 1982 clustered residential densities of one acre minimum size were allowed with 3 acres to be placed in an urban reserve (City Council Policy 600-29). On November, 1985 proposition A was voted in to stop Pardee Construction Company and others from further encroaching on the FUA (North-City-West, Fairbanks Village, portions of Penasquitos, etc.). The general plan scheduled the FUA to be placed into planned urbanizing by 1992 without a City-wide vote.

In 1992 the City Council adopted a framework plan of which we were not notified as we were in the Northwest "horsing around", attending Gonzaga University (R. Christopher Barczewski) and starting up a horse ranch. I attended all previous meetings in 1991 and early 1992 and was assured that Density Transfer Rights (Residential Dwelling Units) would be given to those who had ownership in the "Environmental Tier". This did not take place and without our knowledge and consent, the environmental tier evolved into MSCP.

The Specific History of Rancho Del Sol is as follows:

- ◆ 1975 Started looking at the Deseret Trust property
- ◆ 1979 Purchased 264 acres. The entire property was leased to the Ukegawa Tomato Growers. All but the steep slopes, gullies and creek beds were being farmed. Prior to the

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close of escrow over 800 migrant farm workers were camping in several areas of the land and adjacent. And a condition of the close was for their removal from the land.

Although they were moved, they returned and formed several camps in the various Arroyos.

- 1982-83 Settled the land and built the compound called "Fort Apache" which included a 3 wide mobile mobile-home. Started growing trees and planting them on some of the perimeter. Farming operations continued. Executed a Parcel Map and temporarily realigned Black Mountain Road at the insistence of neighbors and Deseret Trust. Convinced the City Engineers that part of the (present day) alignment would only be temporary and was a vast improvement over the existing old Black Mountain Road. He was concerned about the S curve and prophesized vehicle accidents. These did occur over the years and there are two very serious accidents and a couple of deaths. I promised that the road would be aligned along the Del Mar Pipeline easement and this I intend to do.
- 1981 The last great El Nino took out McGonigle Reservoir. Apparently the spillway was filled by dirt causing the dam to be breached. The creek bed and banks contained the water and the fringe area did not flood. In Deer Canyon the reservoir filled up and its spillway became a 20-ft. deep crevasse. A landslide occurred on Santa Monica Ridge. This was caused by benching or terracing the north slope next to the sewer main and lake. The slide is at the saddle of the ridge on the east end of Lot 1.

Great fires whipped up by Santa Ana Winds from the East have occurred in the past at a frequency of one large fire every ten years and smaller ones every five years. The two large ones that I witnessed was in late 79 and November of 1989. These Santa Ana grass and brush fires cannot be controlled once started and become wild with speeds up to 40 knots or so. Columns of flame, over fifty feet high, were common. I participated in the

Response

fire fight of 89 and let me tell you, it was frightening; watching fire trucks racing away from it at 35 mph on the agriculture roads. We commandeered two D-8 bulldozers and dozed brush and fire breaks wherever we could. The Ukegawa dozers and crew appeared to the East of Fort Apache and cleared large areas of brush and weeds. Zurcher dispatched his dozer and large discs to Lot 31 and created large firebreaks around the Mondeck property and Lot 31. We went up Santa Monica Ridge and dozed what we could and was forced back down the ridge road. Fortunately 20 acres of Lot 1 was previously disced and ready for farming. The fire jumped up Santa Monica Ridge east of Lot 1. Deer Canyon, Cordero ridge and canyon exploded into a very large high intensity fire and continued west at high speed incinerating every thing in sight. The fire was totally out of control burning through the night. The next day the Santa Ana winds came back and whipped it up and headed at high speed to Palacio Del Mar. Helicopters with five-hundred gallon buckets ferried water from the Deer Canyon reservoir. The fire was finally stopped at Palacio Del Mar. At the time, everyone thought that it would burn through to the ocean. I have videos of this episode.

This October or next we expect a big one (1998 or 1999). We have had the big rains and therefore grass, weeds and brush will be quite overgrown and ready to fuel a much larger fire than the fires of 79 and 89. This time we have a large problem. The Deer Canyon reservoir is gone. Where will the helicopters get water for the next Santa Ana fire fight? Fortunately, I installed two fire hydrants at the toe of Santa Monica ridge at both ends of Lot 1 and all the way up Caminito Mendiola and Rancho Santa Fe Farms road to Black Mountain. We have disced all areas possible. Zurcher and Ukegawas farming operation has taken care of all the land surrounding the Rancho Del Sol PRD. Unfortunately, not much has been disced between Santa Monica Ridge and Del Mar Mesa. Due to the situation, I foresee a very high fire risk for Del Mar Mesa. We only have as of this

Response

writing less than four months to prepare and make repairs to the reservoir or create a new one. There are several residential developments that are in danger.

- April of 1985 filed an application for GPA. I proposed an alternative development project employing alternative architecture for commercial, condos, apartments and estate residential. I employed Cal Poly School of Architecture, Rocky Mountain Institute, and others. Created computer models, and made determinations of our microclimate. Obtained year around climate data and ran computer simulations to prove the feasibility of the various Zero Energy structures that we had designed. Identified microclimate and southeast facing slopes to be a major energy resource for stand alone heating and cooling. Identified the southeast facing slopes of Santa Monica Ridge as being the most prime followed by Cordero Ridge and McGonigle Canyon (Lot 31 and most of the lots in Rancho Glens Estates). Specific architecture and models for Lot 1 and Lot 31 were developed and constructed. My project was transit oriented employing water conservation and recycling, alternative landscaping and grading. This application is on file with the City and is a very serious demonstration development proposal. It has been on hold since 1985 as a result of Proposition A. The application only proposed a demonstration project on about 30-acres. Of the 264-acre parcel on where Rancho Del Sol Nursery is presently located. A mix of commercial, condos, apartments, office buildings, and single family structures was to be constructed and demonstrated to the City and State.
- October 1986 City approval of the revised Rancho Del Sol Subdivision tentative map and Planned Residential Development. EIR completed and certified.
- July, 1987 Established Rancho Del Sol Nursery
- July, 1989 Sold Parcel 2 (40 acres) to Cindy Kasai.

Response

- October, 1989 Recorded Rancho Del Sol Subdivision map 12477 and PRD. Initiated development. Sold 29 PRD lots to Duriso, Inc. Retained Lots 1 and 31 of the PRD. CC & R's established. HOA named Rancho Glens Estates.
- July, 1993 Expanded Rancho Del Sol Nursery into a full fledged nursery with 1acre greenhouse, etc., etc.
- 1996 Revised planning as a result of Route 56. Boundary dispute with Rancho Lakes.
- 1998 Deer Canyon reservoir-dam collapsed. Planning revisions for additional Route 56 alignments. Pardee's phase shift proposal and impacts to Rancho Del Sol. Responded to Route 56 Draft EIR's. Assessment of impacts to Rancho Del Sol due to Route 56 and Pardee Construction Company's proposed phase shift plans.

General Comments

I am appalled at what is being proposed by this ill-fated Master EIR. In my opinion, it is promoting violation of the U.S. Constitution, the State of California Constitution, various County and City Ordinances, municipal code, City Council policies, the general plan and even the general concept of the Future Urbanizing Area. Over the years, the City has managed to whittle away at rights of property owners, particularly small property owners with limited resources. Limiting their freedom by overlaying layers of adopted plans such as the FUA General Plan, the adopted framework plan and lately, the City's adoption of the "MSCP" and establishment of "MHPA" preserve boundaries. The latter has become a great concern to myself as it has to many others. The taking of farmland and converting it to habitat has caused a massive problem in the area surrounding Rancho Del Sol, a very high probability of reoccurrence of Santa Ana Wind wild fires such as that that occurred in 1979 and 1989. I predict a similar fire this year or next year (October through December). Therefore, the MSCP/ MHPA plan/ concept is not only a taking of land but is endangering

Response

the health, safety and welfare of our rural community and endangering private property. Smoking cigarettes is safer than being in the MHPA. I am an environmentalist, but only to the extent that private property rights, agriculture/ farming rights, health, safety and the welfare of others are not violated.

Now that I have got this of my chest let us cut to the chase.

- 323 1. The City of San Diego has failed to notify Sandra L. Barczewski, Trustee (UDT 1984), Zero Energy Systems, Inc. and Robert D. Barczewski, Trustee (UDT 1977) - Landowners, of:
- a. City Council hearing on the Framework Plan
 - b. MSCP/ MHPA
 - c. Pardee's phase shift application of 1994 (we were thrown in it and not notified).
 - d. Pardee's deals with the City
- In 1991 and early 1992 I attended all the workshops concerning the FUA and the environmental tier. The City staff assured me that there would be density transfers and preservation of agricultural land. It would be similar to Marin and Sonoma county. This has vanished. Thinking that this was the plan and that we would be appropriately compensated for "the take" we went to the Northwest to establish a horse ranch and to attend Gonzaga University (R. Christopher Barczewski). As a result we did not receive notices so that we could defend our land and land values.
- 324 2. No where is there even a mention of the Rancho Del Sol Subdivision and it's PRD. Please refer to the attached maps. This was recorded on October 18, 1989 along with a certified EIR. As such, the MEIR is flawed and is violating City Ordinances and Municipal code. The negative open space easement grants to the State and the City does

323. Notification for the public hearings on the Framework Plan, the MSCP, and proposed phase shifts was done according to local and state requirements.

324. The title of the approved Rancho del Sol subdivision and PRD is acknowledged. However, throughout the MEIR and Subarea Plan the subdivision is referred to as the project name of "Rancho Glens Estates." Please see Figure 2-3. Figure 2-5 identifies the parcel as the Barczewski Subdivision and also shows the Zero Energy System parcel. The remainder of this comment regarding the prohibited public access to various open space easements is acknowledged.

Response

not allow any public access (trails, etc.). Rancho Glens Estates is the name of the Home Owners Association. The PRD and open space easements are off limits to the public.

- 325 3. There is no mention of my General Plan Amendment application of April, 1985 which was put off calendar as a result of the enactment of Proposition A, a few months later. My proposal for the Zero Energy Project still stands. Even with my limited resources, we spent over \$350,000 in this endeavor. Sometimes I relate myself to John Reardon in Ayn Rand's "Atlas Shrugged". As a result of Prop A I then modified the approved tentative map and finally executed the existing subdivision map and PRD in order to pay off the mortgages.
- 326 For Years we have identified the need for some commercial and mixed use on the northern property. This has been our input to Latitude 33/ Pardee, the City and especially during the 1991 workshops. The northern land is adjacent to the County estate lot development area and we consider ourselves to be in the sphere of the San Dieguito Planning area. They have been already identified the need in the area for office buildings, some commercial and mixed use. Our land is the only thing around that would fulfill this need. This would be somewhat similar to the Rancho Santa Fe Village except for the alternative architecture, TOC and indigenous landscaping.
- 327 Of great value is my discovery of the southeast facing slopes of Santa Monica Ridge, Cordero Ridge and Lot 31. Can you fathom the value of a residential or commercial structure that heats and cools itself without gas or electricity, year round for a hundred years or so? This was validated by the Cal Poly School of Architecture using models and microclimate data in their computer simulation studies. Results of these computer runs were presented to the City of San Diego with my GPA application. This has to do with mitigating global warming. The MHPA proposal would foreclose this tremendous asset.

325. The status and history of the referenced General Plan Amendment application of April 1985 is acknowledged.

326. These comments regarding the preferred land use designations for the ownership are acknowledged.

327. Comment acknowledged.

Response

By the way, I was a consultant to the National Center for Atmospheric Research (Boulder) and the Desert Research Institute (Reno) during the period 1967 through 1972. I worked for Drs. Telford, Squires and Kellog (NCAR) who were then conducting flights through hurricanes and thunderheads with various kinds of aircraft and attempting to model the earth's atmosphere in their computer programs and powerful computers. Dr. Kellog is the Chief person who identified Global Warming. My job at the time was to apply very sensitive instrumentation and classified space, missile and avionics systems and data to their flying laboratories. I learned much from these talented gentleman and applied this knowledge to alternative approaches to residential and commercial structures and began the search for land that would accommodate zero energy structures. Rancho Del Sol was it. Several years later I raised enough money to purchase the land in 1979. After constructing a passive solar house, with other alternative features, in Palos Verdes Estates and living in it for a few years, I moved the family back to San Diego, "Lock, Stock and Barrel". I quit the Aerospace Corporation, terminated my consulting business, custom home building company, sold out my land holdings in Palos Verdes Estates, two restaurants and a commercial fishing boat and settled on the land. I designed a 3 wide mobile home, had it constructed and installed a wind/ solar power station (independent of SDGE) to power the house. This became my real time living laboratory for the next two years. During this time I performed independent research and measurements and formulated the Zero Energy Project and alternative transit oriented community. The City then was interested in stopping any development in the FUA. All my efforts "went to hell in a hand basket" as a result. No one in City Hall listened or was interested. They were too engrossed in stopping development. The end result became the existing PRD which by the way was the first. The only person in opposition was Pardee Construction Company due to their land holdings to the North, East and West. In order to mitigate the influence that they had with City Staff I had to sue the City to eliminate the unfair and

328

328. Comment acknowledged. The Zero Energy Project parcel (305-021-16) is identified on Figure 2-5 of the EIR.

Response

costly conditions that were placed on the Rancho Del Sol Subdivision. Other first in the FUA are (1) Certified EIR, (2) Fish and Game Permit, (3) State of California Coastal Commission Permit. I will never forget the time when the Fish and Game warden came out to give me my permits. She said that I was the first to ever apply for one before the fact. She told me stories about incidents with Pardee and others, including the City- more or less indicating to me that there had been an ongoing battle and infractions. Mind you, this was in 1986. Subsequent to this time, there have been other major incidents. No wonder that the City and Pardee are experiencing major problems with F&G and Coastal. What bothers me is that citizens such as ourselves are paying for the sins of the past. There definitely exists a polarization between the governmental agencies.

329 After Prop A and approval of my last tentative map and PRD (1986) it was suggested by various planners (City included) to offer the property to Pardee or to have Pardee pay for the cancelation of the PRD. Pardee declined. Several times we have proposed to Pardee boundary adjustments and land swaps- Again they declined. A month ago I made another attempt on the East boundary. Again they declined.

330 4. Proposed MHPA -- Please refer to my correspondence of 3/3/98 to the City Attorney's Office, 3/1/98 to Pardee and Latitude 33, 5/1/98 to the Planning Commission.

Of the 156 acres in the Barczewski Family Trust, 146 acres or 93.6% of our land is proposed for contribution to the MHPA. This is not acceptable and will not be allowed for various reasons. Please refer to the Rancho Del Sol Map.

a. The 6.5 acre parcel (2 tax assessor parcels) to the east of the PRD is developed and zoned A-1-10. The finger canyon or gully was filled with compacted dirt and contains a 10-inch commercial sewer line and public utility easement. On the east boundary

329. Comment acknowledged.

330. See response 322 above. In addition, this position on the application of the MHPA to the subject property is noted.

Response

there is a 1,000-ft long Negative Farming open space easement. We are farming this parcel and have planted ornamental trees, shrubs and ground cover (mother stock) for the nursery. We are also using it for soil mixing and will be utilizing it for our thoroughbred horse breeding stock. Both of Pardee's plans show this as part of the MHPA when in fact the MHPA and the MSCP show this property developed and not part of the MSCP. 4.5 acres are affected. None of this property is in the coastal zone.

331 b. Lot 31, 10.3 acres, is in the PRD boundary and is currently zoned A-1-10. 2 acres of it are overlaid with a negative biological easement granted to the City of San Diego. It is not in the coastal zone. Except for the Biological easement it has been extensively farmed and graded. In the past there have been several fires and much of the gentler slopes have been bulldozed for fire breaks. It contains an 8-inch water line and 8 inch sewer. Planning of this property is for high density residential at the top and estate residential at the bottom. The estate residential of 7 one-plus acre lots can be accomplished (A-1-1) and would become a part of the PRD. It has access (60 ft strip of land) to the private street. Currently, no public access is allowed (PRD boundary and Negative biological easement). For all practical purposes this lot is developed and is mitigated. Certified EIR. Both the steep slopes and gentle slopes are southeast facing and are therefore a major resource as they will accommodate the zero energy structures as proposed by the GPA proposal of 1985. The RPO fails to incorporate this or identify southeast facing slopes as a resource and must be included for posterity. There exists a non-building area easement which was requested by the City (for Pardee) in 1986. I granted the easements with the understanding that all NBA and slope easements be extinguished once the primary arterial road situation is established. There are several lots in the PRD that are affected (Lots 12 through 17 and 19 through 21). Since all Pardee phase shift proposals identify the prime arterial location north of the PRD there is now no need for these NBA easements except

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331. These comments on the status of Lot 31 are acknowledged.

332. These comments on the status of Lot 31 are acknowledged.

Response

possibly for a west ingress/ egress for the PRD. I will initiate extinguishment of these NBA easements in the near future.

333 I would like to mention that public trails through the Lee Living Trust parcel is not a good idea. First, it is to be a biological preserve (gnat catcher, etc.). Second, it is a major breeding ground of the Mojave Green Rattlesnake (very plentiful- several hundred kills over the years that I know of). Now I have been told that the U.S. Marine Corp. bred these snakes during WWII for the purpose of dropping them on the Japanese held pacific islands. There is no mention of this snake in your EIRS. They are highly poisonous. Please research the origin of these snakes. If they are indigenous to the Mojave Desert, what are they doing here? It appears that they should be destroyed for the purpose of public safety and for the birds, particularly for the gnat catcher.

334 On another note, there is a small agricultural pond at the center and is a watering hole for coyotes, bobcat, etc. A few years back I sighted a black panther in this area. I ventured in several times (armed) both day and night. There was a large colony of pack rats and several hopping rodents that looked like miniature kangaroos (kangaroo rats). The black panther looked very old and apparently was living off the rodents and cottontails. It shied away. Local folks told me that this cat was someone's pet that got away many years ago. Haven't seen him since. Your EIR did not mention the Road Runner. They are fairly plentiful and appear to breed in Lin property canyon. There have been many sightings in the PRD. I haven't seen any in the East McGonigle Canyon area. I was told by one of our nursery employees that in Mexico they are a delicacy and cross bred to chickens inferring to me that the residents of "Rancho Diablo", the migrant camp, consumed them. A week later he called me over and proudly showed me a caged Road Runner. I brought him a frozen chicken the

333. According to the project biologist, the Mojave green rattlesnake referred to in this comment is likely to be the southern Pacific rattlesnake (subspecies of western rattlesnake) which is very similar in its appearance. The Mojave green rattlesnake is restricted to the deserts of California, Arizona, and Nevada, and the deserts and mountains of mainland Mexico. It is not found in the coastal areas of California. The southern Pacific rattlesnake is not considered a sensitive species.

334. The referenced species were not observed during the biology surveys of the project site. The biology surveys of the project site were conducted by Natural Resource Consultants during 1996 and 1997. A biology technical report documenting the results of the surveys is an appendix to the MEIR. Table 4C-2 in the MEIR indicates that while the greater roadrunner was not observed during the survey, it is a species which could occur on the subject property. The reference to the peregrine falcon (a MSCP-covered species) is acknowledged, but this species was not observed during the biological surveys.

Response

next day in trade for the bird and had him let it go. Later I told him to breed and eat rabbits (Conejo) instead. I gave them a hutch and a breeding pair in exchange for the promise of not to trap Road Runners.

Peregrine falcons (a couple of breeding pairs) have been sighted directly above the Nursery. I have seen them hunt this arroyo. Also, several other birds of prey including barn owls.

335 c. Lot 1, 20 acres is zoned A-1-10 and is a part of the PRD. Equestrian lots are planned for the future (reference CC & R's for Rancho Glens Estates. It has two sewers (8" and 10"). Two 8" water lines and two fire hydrants. In 1981, during the last El Nino, the McGonigle canyon dam (agricultural Reservoir) breached and at the same time a landslide occurred at Santa Monica Ridge on the east end of this parcel. Over the years, dirt from remnants of the 17-ft dam and the landslide were spread out and tilled into the soil during farming operations. Also, export dirt from Rancho Glens was placed and spread. Except for 6.5 acres, all of Lot 1 is above the 100 year flood line. Negative farming open space G delineates the 100-year flood plain. A 48-inch RCP (storm drain) exists north of Lot 1 at the street and empties out through Lot 1 to McGonigle Creek. The 18 inch sewer trunk traverses this parcel. The fire hydrants are at each end of the parcel and were installed for the purpose of combating future fires. The parcel is fenced and gated at three places. Trespassers have ripped out the gates several times. A creek crossing is maintained for police, fire trucks and city maintenance vehicles. This is not a permanent crossing and one needs to be constructed. The State of California Coastal Commission issued me authorization and permit to channel the remnants of the reservoir. This has not been done and will be needed in the future. The Rancho Del Sol certified EIR describes the hydrology and the flood plain, based upon the 1983 topographic survey that I had flown.

335. These comments regarding the history of Lot 1 of the PRD are noted.

Response

336 Pardee's flood plain analysis (Latitude 33) is suspect. To the northeast they are preparing mass grading and modifying the natural drainage channels and as a result will be concentrating runoff towards Lot 1, Lot 2 and Lot 3. We are also concerned about concentrated runoff in Subarea IV and of course, Rancho Penasquitos. Now, the McGonigle Reservoir that was excavated in the 40's still exists. It must be returned to its natural state and channeled. Keep in mind that the 18-inch sewer trunk is next to this lake bed. Therefore remedial work must be done. Page 106 of the MEIR states that no flood control structures or features are proposed in the future for the creek systems in Subarea III. Has there been a combined hydrology/ runoff analysis of the combined effects of Pardee's property/ development plan NE of Rancho Del Sol, Subarea IV and Penasquitos? I believe that none of this has been done and that flood control features will be required to mitigate the runoff created by up stream development. Pardee's proposal is not acceptable.

I have provided comment- Written and oral. I have met with their planners and engineers and put them on notice. The drainage basins are in the Coastal zone. Permits will be required from the State of California to restore the land east of Rancho Del Sol to channel runoff.

337 Lot 1 (20 acres) is currently under cultivation for hay and grass. I will be bringing my thoroughbred horses (brood mares, foals and yearlings) to this specific location as planned. Lot 1 will stay A-1-10 for the immediate future, while we transition ourselves from Spokane to San Diego. This will take at least one year. Adjacent to Lot 1, above the toe of Santa Monica Ridge is a dedicated equestrian trail. This easement was granted to the city as a condition of the Subdivision map. There are no other trail easements granted. This 10-ft trail easement must be graded.

336. The MEIR and Subarea Plan indicate the general location of detention basins which may be necessary to accommodate runoff from the project site. At the time future development proposals are brought forward, detailed drainage studies and appropriate hydrology/water quality measures would be required to the satisfaction of the City Engineer.

337. Comment acknowledged.

Response

I have no intention of contributing any of the land to the MHPA. In fact, a cursory review of the MSCP plan that I reviewed at the Carmel Valley shows this area and others as not in the MSCP and was in a developed state.

- 338 We will be demanding that McGonigle Valley/ Canyon be continuously farmed to the east and west as it has been since the Bear Flag Republic and possibly during Spanish Rule. This will be our insurance regarding fire control. Also dirt roads for fire trucks, etc. must be established and maintained. Under no circumstances should revegetation take place. There exists a slide next to and on the Pardee property. Again, this occurred in 1981 and appears on my 1983 topo.
- 339 d. Remainder Parcel 4, Ex. Map 12477, 113 acres. Pardee proposes to place this in the MHPA. This will remain A-1-10. This is not acceptable and I have no intention of ever contributing any of the land to the MHPA. This will remain A-1-10 with no public access. Except for the southeast slopes of Santa Monica Ridge all of it is in the Coastal zone. A certified EIR for this property was completed and approved in 1989 by the City and State. A substantial amount of Negative Biological and Farming open space easements were granted to the State and to the City in accord with the EIR and conditions of the Subdivision Map 12477. All landforms and biological sensitive areas are permanently protected and without any cost to the citizens of San Diego. I still have the burden of property taxes and the maintenance of these preserves. These preserves are consistent with the goal of the MHPA.
- 340 In a detailed review of your last DEIR for Route 56 I noticed that the MSCP boundaries left out parts of my property that is physically located on Del Mar Mesa and abutting Mr. Goodell's subdivision (which by the way we never received notice

338. Comment acknowledged.

339. Comment acknowledged.

340. Comment acknowledged.

Response

from the city or Mr. Goodell. I am informed that Mr. Goodell's subdivision has been approved however. His subdivision land-locks that portion of the property abutting his.

Mr. Goodell and Mr. Coopersmith has promised to make the necessary corrections prior to his transferring the proposed subdivision to the new owner.

341 Pardee's proposal has failed again. Also, the MSCP map that I reviewed at the library shows developed areas in this 113-acre parcel. Nowhere do I see a yellow area to accommodate the Route 56 alignments that have been in existence prior to any MSCP or MHPA. This cannot be. Route 56 has been in existence before the annexation of the land into the City (1962). Annexation took place in 1964.

342 The SE facing slopes of Santa Monica Ridge and Cordero Ridge are a major resource as explained before and must be in the RPO, it is just too valuable of an asset for zero energy structures.

343 Another significant resource is the existence of mineral resources MRZ-2 on half of Santa Monica Ridge and Cordero Ridge. According to the MEIR (pages 315-316) significant mineral deposits of MRZ-2 are present and that there is an anticipated 60 million ton deficit of PCC aggregate through 2030.

These resources are extremely important to the zero energy structures as larger amounts of concrete are needed for the earth integration and the trombe-walls.

Now I have made a copy of your figure 4 I-2, mineral resource zones. Please note that the southerly alignment that I propose(d) for Route 56 is through this resource area.

341. This comment on the history of the State Route 56 alignment and the relationship of the alignment with the establishment of the MSCP is acknowledged.

342. Comment acknowledged.

343. These comments on the Central Alignment for SR-56 and mineral resources within Subarea III are acknowledged. Please see response 347 below.

Response

Do you fathom what this means? These will be enough aggregate to help pay for Route 56. Mining operations can go on prior to completion. Therefore the Route 56 alignment in Cordero Canyon/ Ridge is the most optimum and will further conserve of the shortage of this material. You must place this alignment as the most economical as well as resource oriented. I do not know how far the Cordero Ridge MRZ-2 deposits go east of SAIII. I believe, they will extend all the way. If so, than a tremendous cost savings will occur and the excavated material will alleviate the shortage predicted by 2030. In short, there will be enough base and enough concrete for Route 56! Am I missing something? Therefore, there can only be one alignment for Route 56 – This I have previously proposed in 1993, 1996 and again and again. I will be transmitting this information to all concerned and, the City had better be ready to respond and to provide a competent, nonpolitical comparative analysis. It is just too damn important. All this information is in front of your faces- Am I missing something?

344 As for farming I intend to keep on and go into grass, hay, horses, some corn, etc.

There is a significant shortage of hay in California and most of it is being shipped in from Utah and Arizona. As for irrigation I intend to fire up the old well and put in a couple more. Also the permanent location of the growing grounds for Rancho Del Sol Nursery will be located on Santa Monica Ridge and other areas. Not all land is suitable- depends on the elevation.

344. Comment acknowledged.

345 The Deer Canyon reservoir is gone and is now a major source of siltation to

Penasquitos Lagoon. In order to control this, around four acres of the 16- acre Biological Easement needs to be converted back to agriculture. I will be applying for this change with the Coastal Commission and I am reasonably certain that it will be granted. At its present state, it is a problem. There is an area left where water has

345. Comment acknowledged.

Response

pooled and large wide mouth bass are still alive. Mr. Wallace, a resident of the PRD has taken it on to himself to move the fish to another lake.

We will be expecting that the farming areas east of Rancho Del Sol will remain to protect against Santa Ana wild fires.

Please refer to the figure showing all the possible SR-56 alignments through this parcel.

346 The MSCP/ MHPA has failed to provide for any of the middle proposed routes and as such is flawed the existence of Route 56 has been known since 1962. The city annexed in 1964. The FUA was created in 1974 with the 1962 alignment in place. In 1985 it was moved to the toe of Santa Monica Ridge. In 1993 I identified the Cordero Canyon alignment. In 1996, 97, and 98 I validated this alignment as the most viable and with the least environmental impact. Now, with MRZ-2 deposits this must be the route taken.

347 I present to you page 318 of the MEIR. This is quite interesting as it demonstrates the short sightedness of this document:

Issue: Yes it would because once in never out and the construction industry will be short, impacting the required sand, gravel and aggregate at great expense to the future residents of the area.

Impacts: There were existing mining operations in the overall area. There used to be a sand and gravel plant and ready mix plant. These are all gone as a result of the

346. Comment acknowledged.

347. The draft EIR concludes that the inability to mine mineral resources under the proposed projects is a significant cumulative impact. Only adoption of the No Project alternative would eliminate this potential adverse effect.

Response

development of Carmel Valley. There has been no replacement. Pacific Highlands Ranch is but one area of the FUA.

Of the 116 acres of designated MRZ2 zone lands of which we are part, the deposits are identified as a source of aggregate which will be required locally. The cost of housing must be kept down! How in the world do you, the City, demand low cost housing and at the same time create a shortage of the basic materials for construction?!

Pardee's proposal of incorporating Rancho Del Sol 113 acre parcel is ludicrous and we will not allow it to happen. What has happened to common sense? Even the most prudent environmentalist would laugh at this proposal. Can you fathom the amount of pollution from the trucking in of materials, the wear and tear of our overburdened freeways and roadways, etc. and etc.

Precluding the reasonable extraction would be a travesty.

348 Consider Route 56 and its needs: The base required, the concrete required, and the excavation and grading required. The statement of significant impacts is played down. There is a history of mining activities in the FUA which have been shut down. There will be no intent on the part of Rancho Del Sol to keep this resource in perpetuity. How can the writer of this paragraph conclude that since they would be retained in perpetuity as open space areas that there would be no potential significant direct impacts (or anticipated). The person who wrote this should be summarily fired. I request an investigation of this area and further request that Mr. Frank Belock, the City Engineer be deposed as to why the Barczewski Southerly Alignment is "fatally flawed". We are talking about millions of dollars in savings to the tax payers and

348. Comment acknowledged.

Response

future residents. I further request an economic analysis of the situation. Certainly something is not adding up and, we the property owners in the area are being kept in the dark. What is the hidden agenda?

The value to Route 56 is enormous and Cordero Canyon is pointing the way.

349 I just hope that I have not incensed anyone in the City as most of you know that I have allot of respect for it's staff. I intend to obtain a permit to initiate the partial mining of this resource without impacting the land. You all know that I have been very prudent and a good steward of the land. There is just too much at stake to allow any further restrictions. Let common sense prevail. Route 56 must go through to keep you the City, out of State and Federal courts. All resources and efforts must be concentrated in accomplishing Route 56. Without it, Penasquitos and Carmel Valley is shut down. Also, there is a growing hostility towards the City. There are talks of "de-annexing" or "detachment" due to apparent mismanagement or failure to communicate. Before closing comments on this 113 acre parcel there are more items that are required. You must show access from the west across Pardee property to Rancho Del Sol. This must be a 60 ft. ROW so that we are not impaired in any way.

350 Regarding the sensitive plant species: As you know we are a commercial nursery with major facilities and talented personnel. We can in fact grow any of the sensitive plant species. Will the City of San Diego purchase them in quantities of thousands of flats? I have always been intrigued about these indigenous plants. But, is there a market? As for the remainder of this parcel, the fire of 1989 was so intense that the south side of Cordero Ridge was totally incinerated. 150+ year old barrel cactus stands were totally done in. My investigation and reconnaissance of this area established that there

349. These comments on SR-56 are acknowledged.

350. Any revegetation done to establish mitigation credits within the MHPA would be accomplished pursuant to the Conceptual Revegetation Plan prepared for the draft MEIR and per a Master Revegetation Plan as part of the Subarea Plan.

Response

had been no fires in the past 200 years. There is not much left and therefore, Cordero Canyon is quite available for Route 56.

351 Concentrated runoff from upstream development appears to have collapsed the Deer Canyon reservoir. It is now a major source of siltation. Remedial work needs to be performed and the City needs to concentrate on flood control and perform more hydrology studies.

351. See response 336 above.

352 This 113-acre parcel is part of the Rancho Del Sol Subdivision Tract Map 12477, Recorded 10/89. It has two 8-inch water lines to it and access to the McGonigle trunk sewer via two existing 8 and 10- inch sewers. It is landlocked and requires public street access to the west although it has prescriptive rights as a result of farming operation and existing dirt roads above and below Santa Monica Ridge. Part of the property is topographically part of Del Mar Mesa and abuts David Goodell's development.

352. This comment on the relationship of the subject property to another subdivision within Subarea V is acknowledged.

353 Mr. Goodell/ Latitude 33 and the City failed to give us notice and the benefit of the various hearings, and review of their EIR, hydrology, grading, streets, etc. Portions of this property is not even in the MSCP. I notice that the source of maps and info is Latitude 33 planning and engineering. A detailed inspection of Figure 3-4, Regional open space plan (MSCP) shows the boundary of Subarea III not including several acres of this parcel at the south.

353. Figure 3-4 is intended to generally illustrate regional open space.

As a result, we demand a hold on Mr. Goodell's final map until we assess the impacts to our land. I already know that his subdivision will be dumping runoff water on our property, and that they have not provided us access to the public roads. I also need to know the location of public utilities and the like. They are also planning to grade our

Response

property. We understand that the approved subdivision is in the process of being sold. We need to give notice to them of our intent to provide another SR 56 alignment below Del Mar Mesa. As for the adopted framework plan we again did not receive notice nor had the opportunity to address the City Council. We did hear after the fact that the Mayor and some members of the City Council considered it unfair to the small property owners and favored Pardee, but adopted it for the lack of anything else.

354 The MSCP and MHPA plan was not provided to us for review. We have not had the opportunity to review and comment. We again did not receive notice of the plans. I have heard that there is a procedure where in adjustments to the plans can be made. Please provide us with the City of San Diego notice package: Three sets to:

Sandra L. Barczewski, Trustee
8222 South Ramona Rd.
Spokane, WA. 99224

Robert D. Barczewski, Trustee
6561 Black Mountain Rd.
San Diego, Ca. 92130

Zero Energy Systems,
Same as above

As presented I consider the MSCP as a "land take". It is in my opinion this is a violation of the U.S. and State Constitution and may be in conflict with existing City Charter, ordinances and codes. It also appears to be an intent to take away agriculture and future development rights. It is in conflict with the General Plan, the FUA language and City Council Policy 600-29.

354. The MSCP was adopted by the City Council in March 1997 and copies of the MSCP and descriptions of the boundary adjustment process are available at the City of San Diego. The public comment period for the Environmental Impact Report/Environmental Impact Statement (EIR/EIS) ended on October 15, 1996, and therefore there are no public noticing packages available. However, the EIR/EIS (LDR No. 93-0287) is available for review at the offices of the Land Development Review Division at the address noted above.

Response

What ever the case, we have established many acres in farming and biological preserves in accordance with 600-29. A certified EIR is on file. The remainder of the property must be considered for urban development as planned and established by the subdivision map 12477.

Route fifty-six

355 The figure shows the various Route 56 alignments through Rancho Del Sol. All possible alignments go through the property. As an affected property owner with substantial knowledge of the land the most environmental sensitive is the 1993 alignment that I had proposed to Caltrans. Please refer to my letter to the Planning Commission.

In 1985 the city staff and I agreed to eliminate the 1962 alignment in order to save McGonigle Canyon/ Valley and Santa Monica Ridge. We then placed it next to Deer Canyon at the toe of Santa Monica Ridge. In 1996 the City (Belock Alignment) moved it up Santa Monica Ridge. This is currently referred to as the Central Alignment. It wipes out much of Santa Monica Ridge, particularly the SE facing slopes which is a Major Resource as previously explained.

The 1998 alignment alternative resulted from the demise of the Deer Canyon Reservoir and provides for a more superior alignment without affecting the Santa Monica Ridge slope. However it does present a future problem with regard to future development.

355. These comments on SR-56 are acknowledged.

Response

The 1993 alignment is the most superior of all, having natural topographic barriers and substantially less environmental impacts. It does not affect any vernal pools and will be scenic. More important, it can accommodate expansion to 8-lanes or more as desired by Caltrans and the City Engineer. The recent findings (MEIR info.) of the existence of significant high quality aggregate (MRZ-2) deposits (and extending to the east) makes this alignment completely and clearly superior. It will save the taxpayers of San Diego millions of dollars and will actually help the environment, promote farming and preserve farmland. The material excavated will be used by the highway and what export is left will be utilized locally.

Page 316 of the MEIR states: Based on a total projected Portland Cement concrete (PCC) demand of 360 million tons of aggregate and assuming that all PCC quality material will be used, there is an anticipated 60 million ton deficit of PCC aggregate through 2030.

It therefore appears that to alleviate this shortage, SR 56 must go through Cordero Canyon, I do not have a handle on the quantities that are involved, but based on the info given and assuming that there is a deposit 8,000 ft long, 30 feet deep along the ROW compute out to be:

350 feet width X 30' depth X 8,000 feet = ~2,896,500 cubic yards or 5,793,100 tons

This would help the shortfall by 10% and would provide future access to the deposits for the development of the various subareas. In addition, aggregate, sand, gravel and concrete processing plants can be located within a very short distance to the various developments and result in very short trucking distance which would in turn lower costs, lower emissions and therefore lessening to a small degree global warming.

Response

There will also be less need to create sand pits in areas that are classified as wetlands. Obviously, I do not know of all the facts and ramifications. However, I do know that tremendous savings will occur and that we will be keeping our own dirt etc. in "our own backyard".

Perhaps this is an answer to Mr. Frank Belock's problems. As I recall he has the problem of providing over 8 lanes of freeway. Now it appears that this is more than feasible. I am sure that all sorts of negatives will be thrown up. However, I believe the positives will greatly outweigh the negatives.

Who ever got this MRZ-2 info in the MEIR must be complemented because of the importance to the Route 56 Dilemma. No one is happy with the other alignments. Now everyone should be happy with this one. Just think of the millions of dollars that it would save. As for mitigation, I believe that this approach is self-mitigating, except of course for the required plantings, dust control, etc.

- 356 Moreover, there will now be the possibility of more permanent reservoirs. Then there is the total preservation of Deer Canyon and it's water shed.

As far as the MHPA / MSCP is concerned – They are only a plan that is on shady economic and legal ground. They are not law. They are after the fact. Route 56 alignment has existed since at least 1962. Annexation into the City took place in 1964. The General Plan and all the other adopted plans call for Route 56 to be in this southerly corridor. The MHPA and the MSCP must take a back seat or be placed on the endangered list or in the trash can. It is reaching too far.

356. The MSCP is approved and adopted by the City of San Diego and is used within the City in its permit decision-making process. It is anticipated that the California Coastal Commission will review the MSCP and consider its adoption sometime in 1998.

Response

The MHPA also endangers wildlife, private property, farmland, and farming rights. It is setting up the enormous probability of huge wild fires that endanger the lives of people and property. As I said before, I have seen two large ones in the last twenty years. Do you know that fire trucks are helpless and that the only effective means are bulldozers? Where will the dozers be when we need them? It was the farmers who supplied them when needed and where close by – farming.

I think that preserving the areas as I did is necessary but not on a wholesale basis and not at the expense of the property owners and the taxpayers. An artificial shortage of developable land had been created. Who can afford to live in the area? You promote low-cost housing and require it. There is no such thing in North County. Lastly, it is un-American. As one person said to me: “Bob, I am a liberal democrat from Minnesota. I have never seen anything like this (MHPA/ MSCP)”.

Needless to say, I will not participate in this ill fated phase shift application. I see no chance for its approval. I will not allow any further land takes. We have already given up at no expense to the taxpayers 50% of the land plus provided public roads, etc. We have a certified EIR. The next take will be Route 56 but we agree with the requirement for it and will be compensated.

As Concerns the MEIR’s proposed take of prime and semi-prime agricultural land and its incorporation into the MHPA:

3571. The write up (pages 307-313) is definitely biased towards land take. It starts off by saying that “agricultural Production has a lengthy history but is not regionally significant. I attach here with my notes and markup of this section. It then goes on and states that agricultural pursuits in the area overall are diminishing and only discusses this in terms of vegetables. Next it identifies that only 136 acres are prime farmland and which are

357. The draft EIR concludes that the loss of important farmlands under the proposed project is a significant direct and cumulative impact. Only adoption of the No Project alternative would eliminate this potential adverse effect.

Response

located in McGonigle and Deer Canyon (figure 4-I-1). It then finally admits that 14% of the Subarea have high soil ratings. It also eludes to the fact that 48% of the area is economically farmable and that most of it is being farmed. Finally it states that 52% of the soils are mainly restricted to pasture, range or recreational uses. Then it goes on to state (as required by law): "Conversion of prime agricultural land to non-agricultural land use, or impairment of the agricultural productivity of prime agricultural land is cited in the CEQA as an environmental consequence which may (or will) be deemed to be significant: (State Administrative Code, Section 15064). Also defined in the California Government Code, Section 51201, Williamson Act, LAFCO guidelines, etc., etc.

3582. This section of the MEIR fails to identify and include the horse industry in the overall area including Rancho Santa Fe, etc. Horse breeding and raising is agricultural and is huge. Did you know that we have the largest population of horses in the United States? We are breeders of thoroughbred horses. We also raise them. We also have a stable of horses of racing age. We are members of the California Thoroughbred Breeders Association and are licensed to race in the State of California, Washington and Arizona. I will be contacting the State and the various associations to inform them of what you are up to. Your plan to convert prime farmland and pasture land into habitat will not succeed. It is ludicrous and a waste of the taxpayer's money.

3593. I want to bring your attention to page 308 (my markup) entitled, "Important Farm Lands". I have drawn in the boundaries of Rancho Del Sol. All of McGonigle Valley, Deer Canyon and portions of Cordero Canyon is prime farmland. Lot 1, 20-acres, over half is prime. The same for Lot 31. The 113-acre Parcel: except for the steep slopes of Santa Monica Ridge and Cordero Ridge, all of it is prime. In addition, these Ridges contain another prime natural resource – MRZ-2. Therefore, this entire parcel is prime

358. It is acknowledged that pasture land for horses is considered agricultural. Its loss is included in the draft EIR conclusion mentioned in response 357.

359. See response 357. The portion of the comment regarding preference for the Central Alignment for SR-56 is acknowledged.

Response

and cannot be incorporated into the MHPA (except for the biological preserves under protective easements).

In answer to the question posed in part 4, section 1 of the MEIR "Would implementation of the Pacific Highlands Ranch Plan result in the conversion of agricultural land to nonagricultural uses or impairment of existing agricultural land to non agricultural productivity?" I answer: Yes, The MHPA would convert it to habitat and create enormous fire hazards. And then the next question, "Would implementation of the project result in the prevention of future extraction of sand and gravel and/or mineral resources?" Again, Yes, it will make it impossible.

The selection of the 1993 Central Alignment for Route 56 will be conducive to the preservation of prime farmland and other natural resources. Designed properly, it would also provide the necessary access and other infrastructure to help promote its use. In addition, it would serve as a dividing line between the true preserve area (Del Mar Mesa and Penasquitos Canyon) and the agricultural oriented area surrounding the planned urbanizing areas. Biological and wildlife areas would still be interconnected but to the extent where prime or near prime farmland is implemented.

I have been actively engaged in agricultural pursuits over the years and have become very experienced in mitigating farmed areas and wildlife/ biological areas in the same ownership. Most of the time they go hand in hand. One does not have to foreclose the other out as I have experienced with Poplar Gate Farm here in Spokane, WA. We have 25 acres of grass/ alfalfa bordered by areas of pine forest. The house, paddocks, pens, barns, turnouts, arenas, orchards, residences are on the other 25 acres and which are bordered and interspersed with large pines and natural wild life and biological habitat. We provide water, salt licks and other grass areas (in the rockier part). The end result as

Response

my pictures and videos will validate is a farm/ranch that is teeming with wildlife and birds.

For example, living on site is about four white tailed deer, occasional large coyotes, porcupine, an occasional moose, elk in certain seasons and red deer. The birds are varied and profuse as well as seasonal. Year around we have 200 covey of different varieties of quail and game, pheasant, red-headed wood peckers (next to the house as well), two breeding pair of hawks (redtail and other), magpies, etc. Birds of prey are currently nesting (about four nests).

The alfalfa field is open and fresh running water is provided year around. Large mammals come and go as they please because we do not allow total fencing of the perimeter. The adjacent owners have portions of their fields in wheat and oats. In the fall and winter hundreds of geese and duck arrive. Swallows even migrate here in the thousands. No hunting or shooting is allowed. The birds and quail integrate with the horses in the pastures and paddocks. There are also 4 barn cats and two dogs. The cats keep the rodent population under control and out of the barns and feed rooms.

e. The northern parcels that are clear of the MHPA proposal are:

- 360 1. Sandra L. Barczewski, Trustee. 2 Parcels divided by dedicated 60' wide Santa Fe Farms Road totaling 28 acres net. Under intensive agricultural use continuously since the 1800's. Contains one residence and substantial nursery infrastructure and buildings. Wholesale and retail nurseries. Production of color plants, groundcover, palms, ornamental trees and shrub, the Rancho Del Sol Nursery is the only wholesale nursery left in the area. Evergreen, a retail nursery, will be moving to Oceanside.

360. Comment acknowledged.

Response

2. Robert D. Barczewski, 1 Parcel, 6.6 acres

In 1990 as part of the Rancho Del Sol Subdivision conditions, urban infrastructure including 10" and 8" sewer, double 8" waterlines, public street expandable to 92 feet (4 lane) with concrete curb and gutter and storm drains were constructed. 8" and 4" water main laterals, several water meters (2" and 1") are available to each of these parcels. Also fire hydrants and street lights. Extensive and beautiful landscaping was installed. Mature trees and shrubs line the streets.

The highest and best use has been identified in the past and present as neighborhood commercial and mixed use. The property is not to be sold and is for the generation of income for the benefit of Sandra Barczewski in her lifetime and the two primary beneficiaries R. Christopher and Marci Ann Barczewski and posterity. The land can be developed for income but not sold unless circumstances require.

These properties are covered and governed by certified EIR and the Rancho Del Sol Subdivision Tract Map development conditions as executed in 10/89.

361 The phase shift/ GPA application of April 1985 still stands. The proposal is for the development of an alternative transit oriented village similar in architecture to Rancho Santa Fe but employing alternative architecture, grading and landscaping. Heat and water recycling and incorporation of alternative energy conservation techniques, apparatus, etc., etc. A substantial effort and resources were expended, not including the R&D effort that was accomplished in Palos Verdes.

Sandra Barczewski's parents are Edwina McDowell (deceased) and Paul McDowell. Both long-term residents of San Diego. Edwina was employed by the City of San

361. The status and history of the referenced General Plan Amendment application of April 1985 is acknowledged.

Response

Diego for a long period, she was the secretary for Mr. Ed Gabrielson, City Engineer and after his retirement became the first women building inspector for the City of San Diego. Paul, was the chief operating officer/ V.P. for Trepte Construction Company. Both retired and moved to North City West, purchases one of the first few houses from Pardee. Marci Ann also lives in a condo purchased from Pardee. Since their retirement, the McDowells and Gabrielsons have remained social friends.

Out of respect for the City, her parents and the Gabrielsons, Sandra Barczewski will not stand in the way of the City's crucial need for a Route 56. Therefore, although she does not like Route 56 crossing her property and destroying and impacting what we have established there, she has established a corridor on her land for this crossing. This detailed info was sent to you and I will not repeat it. She is opposed to anything further north on her property and will in fact file suit to protect her interests. All Alignment D, Modified D and Modified F, as far as she is concerned, are one and the same. The analysis we did on these crossings specifies the exact crossing/ alignment and that would be at least cost and damage. There will be mitigation for Rancho Glens Estates and this will be taking Lot 27 and 26 out of the PRD and adjusting and reconstructing the entranceway. The land could revert back to the subdivision and the original owners in turn for credit towards the land take that is necessary for the freeway. Other mitigation would be to shift the alignment 1,000 feet west before coming into Rancho Del Sol. This, however, is assuming that a southerly/ central alignment is not politically feasible for the City at the present. Also, this assumes a four-lane plus expressway and that all future lanes would be accomplished in the south a decade or so from now. As for the other prime arterial (Carmel Valley or Del Mar Heights), we are assuming that the City Engineers (1982) successor, Mr. Frank Belock will stipulate to the realignment of existing Black Mountain Road and the removal of the "S" curve and be aligned along the parcel property lines which are

Response

coincident with the centerline of the forty foot Del Mar Pipeline Easement, or be placed at the northern boundary and terminating at Rancho Santa Fe Farms Road. This would allow for the future 4 – 6 lane prime arterial at either location. For some reason, Pardee will not listen or incorporate this requirement. This is specified in my subdivision map conditions. Furthermore as a condition of this “safe corridor” alignment and the identification of Carmel Valley prime arterial to be located north, we expect the immediate vacation of the temporary non-building area easements and slope easements that were imposed on the subdivision. This pertains to Lot 31, 13-18 and 19-22 of the PRD.

362 Pardee’s proposal calls for peripheral Residential on the two larger parcels and, low density on the north parcel. This is not acceptable as previously explained. We are planning a village mixed use commercial on the entire property. We have provided detailed comments and documents to Latitude 33. None have been incorporated. They cited the City as the culprit. Please refer to Cathy Winterrowds letter to Latitude 33. She is providing direction to them: “Barczewski: show framework plan land uses and corresponding zoning, do not include a second commercial core on this property, include the existing development area, show the MHPA consistent with the adopted MSCP Subarea plan.” Finally she says “provide all property owners with a copy of the proposed Subarea plan for their review and comment.”

363 1. Since she is the project manager in the City for this Subarea, is she not responsible to insure the earliest communication of information to all affected landowners? She has not done this. All the people around were kept in the dark. The only reason I found out about this was a very late City notice. She, Pardee and Latitude 33 has purposely withheld information. She shall be held accountable for this

362. These comments regarding the landowner’s position on the proposed land use designations for the ownership are acknowledged.

363. All noticing for the proposed project has been done in accordance with local and State requirements. The references to the “Pardee Settlement Agreement” on pages 83, 105, and 186 of the draft MEIR are taken from the City of San Diego’s MSCP Subarea Plan (Item C19). This document is available for review at the offices of the Land Development Review Division at the address noted above. For information on the settlement agreement, please contact MSCP staff at the Community and Economic Development Department, 202 C Street, Fourth floor, San Diego, California 92101.

Response

action. We did not receive any prior notices on the other matters over the last few years.

In the MEIR, there is mention of a Pardee settlement agreement with the City. It is not provided. We all demand a copy of this agreement since it does effect all the other properties, public safety, health and welfare, etc.; As well as the proposed taking of land.

- 364 2. "Framework plan uses and corresponding zoning" are something very new to us. We have not been noticed and have been deceived by the City of San Diego. Where are the density transfers, etc., etc.?
- 365 3. Do not include a second commercial core on this property. We are not asking for a commercial core. We are demanding, based upon long term planning and prior applications a village orientation to serve the greater San Dieguito planning area. We are part of it and the City does not even recognize this. We identify with the greater Rancho Santa Fe area and will continue to do so. There has always been a need for a village center for the past 20 years. There is a shortage. Therefore, we do not understand her and Pardee's problem. Again, we are the first on the block-executed subdivision, urban infrastructure, commercial infrastructure, and so on. Perhaps Cathy is too used to extreme high density and cookie-cutter homes. We must preserve what is left of our living environment and this is certainly not what is proposed by Pardee. Frankly, although Pardee serves a good purpose, they and the City have failed to recognize our past planning and development efforts. Pardee wants mass grading and manufactured slopes. We don't. Pardee wants heavy concentrations of housing and a get in and out type of construction. We

364. The North City Future Urbanizing Area Framework Plan is a document for guiding the City in its achievement of community goals and objectives. The Framework Plan identifies broad goals and policy statements to be used in evaluating future planning efforts in the Future Urbanizing Area. The specific subarea plans are land use plans that, by their nature, amend the Framework Plan for the subject subareas.
365. Comments acknowledged.

Response

don't. Pardee wants to destroy natural drainage courses. We don't. Pardee wants to place highways in the North, we don't. I can go on and on.

It's been said and I am beginning to believe that Pardee has controlled the City's Planning Department for the past twenty years. I can say that I now believe this. They just go ahead and do what they want to accomplish the various developments that they are planning in all areas- in and out of the FUA. General Bull Moose has gone too far. It is now time for the city to take time to fathom the huge problems that are festering to the East (Penasquitos) and to the West (Carmel Valley). It appears to me that the city must place a 2 year moratorium on all residential construction in these two areas. We are being punished for the sins created in these two areas. Caltrans is mentioning a 2 year delay of any construction of Route 56 Central segment because if built it will cause 15 – 30 minute pile ups at Carmel Valley I-5.

With the above in focus, does it not seem more sensible to create areas of commerce, etc. To offer businessmen (and women) an alternative to La Jolla Village, Downtown and even Carmel Valley. My God, we are having some problems just getting over to the Del Mar Race-Track and Red Tractons Restaurant.

- 366 4. "Include the existing development area". Well this is not acceptable. This is against the concepts of the General Plan, etc., which I will expand on later.
- 367 5. "Show the MHPA consistent with the adopted MSCP Subarea Plan." This has not been done. In fact, the MHPA plan by Pardee is a forgery. They have concocted 100 year flood plains boundaries based upon their runoff (mass grading on the northeast), proposing to inundate Lot 1, 2 and 3 and other areas and then,

366. Comment acknowledged.

367. The City of San Diego's MSCP Subarea Plan contains provisions for Boundary Adjustments. The Boundary Adjustment that has been proposed for this project is the result of discussions among the City of San Diego, the United States Fish and Wildlife Service, the State Fish and Game Department, conservation groups, and the applicant, and does not reflect any independent actions on the part of the City's Subarea Plan Project Manager.

establishing an MHPA boundary based upon this. What do you think of this? Is this a forgery? These are heavy accusations, but I have the proof. Will Cathy Winterrowd be able to withstand a searing deposition. Well, she had better be prepared for one. Her failure to communicate with us is not acceptable. Who does she work for? The City or Pardee? We will not mince any words when it involves anything to do with her proposed MHPA. A simple comparison with the original proposed MHPA (which we were not notified of a few years back) and the current one will show glaring differences. She is just allowing Pardee to do what it wants.

Therefore, I see no alternative but to recommend to the City that she be removed as a project manager for Subarea III. There have just been too many infractions, the main one being not being available to other affected landowners, smaller or larger, NIC Pardee.

368 On other issues, we are opposed to their circulation plans through Rancho Del Sol. NOT ACCEPTABLE. We have provided input to Pardee and Latitude 33, but to no avail.

368. Comment acknowledged.

369 There is also the elementary school location next to our heavy farming, horticulture and horse operations. This is not acceptable to us or to the Home Owner's Assoc. (PRD). Pardee has all sorts of more viable locations to the east next to their proposed open space. Also this is not a good idea regarding the PRD and the future intent of my providing a small retirement area.

369. Comment acknowledged.

370 There are proposed public trails. As mentioned before, this is not possible for reasons said. There is, however, a dedicated 10 foot equestrian trail above the toe

370. Comment acknowledged.

Response

of Santa Monica Ridge. Give me some money and I will put it in. I also have other better ideas for the bike paths, hiking trails, etc.

371 Pardee proposes to wipe out our street (1990 installation) and infrastructure. Since we only see Modified F as the only possibility for the Northern Alignment, I will not pay any attention to the other alignment proposals. We hereby demand that our street remains intact. We will not succumb to Pardee's mass grading proposal and infrastructure as they see it. They must maintain natural drainage courses and grade accordingly. We do not accept any of their proposed circulation. We will dictate to them as what is and what isn't acceptable. I have already provided substantial input.

372 Finally, I want to relate to you that for years we and other have considered the northern corner parcel known as "Bob's Corner" locally as for commercial use only. There are many, many memories with regards to the balloonists and "Nice Guys" events, etc., etc.

373 There are many flaws in the presented and colorful aerial photographs depicting the boundaries. The Coastal zone is 550 feet off – too far north. Property boundaries are also about that much off. In short there is not anything in the MEIR that does not revision. It is a losery, error-ridden proposal and will require substantial overhaul and newer and more objective sources of information.

Since it is now 3:00 p.m., Sunday and the deadline is tomorrow, I will close.

371. Comment acknowledged.

372. Comment acknowledged.

373. The Coastal Zone boundary and property ownership boundary shown in Figure 3-3 is included in the MEIR to generally illustrate these features within the content of the larger subregion. More precise boundaries of each are shown in the Subarea Plan.

Response

- 374 1. Please do not include any of the property that we own that is proposed to be taken over by the MHPA in this proposed phase shift. These are Lots 1, Parcel 3 to the east and 113 acres of remaining parcel 4.
- 375 2. Rancho Del Sol exists as a legal subdivision. It is not even mentioned anywhere in the document.
- 376 3. Provide a reservation of 10% of all of Pardee's residential density ad 10% of the proposed commercial for Rancho Del Sol.
- 377 4. We are totally opposed to the MHPA proposal. It does not even come anywhere close to the original MSCP plan Proposal. The legal grounds for the MSCP is also quite shakey.
- 378 5. Route 56 should probably be delayed so that we don't rush into a bad situation. Several events and discoveries have occurred as previously explained. It sure looks like the Southerly Modified Central Alignment as I proposed based upon information provided by the MEIR is the way to go. Two years seems to be the appropriate delay. A moratorium on Penasquitos and Carmel Valley should also be imposed. It appears that staff in the City must be reorganized. Probably new faces, mindsets, etc. This will be required for you to respond to some very upset residents and landowners in the area. The whole Subarea III will have to be redesigned from the very beginning for it to become a reality. So far it spells G-R-E-E-D.

374. Comment acknowledged.

375. See response 324 above.

376. Comment acknowledged.

377. Comment acknowledged.

378. Comment acknowledged.

I apologize for not having the time to edit my own writings. Therefore consider it as a rough draft. Again, I am trying to keep things in proper perspective. It is hard to do when your own neighbors are upset and have litigation against the phase shift proposal and Route 56 specific alignments.

I just hope that I have conveyed sufficiently the information on what the areas of trouble are.

Response

I have seven yearling thoroughbred horses that I will be naming soon. Since I have been so engrossed in the matters concerning us I have decided to submit names to the Jockey Club as follows. Keep in mind that I own a stallion named "Dave's Reality" by his famous sire "In Reality."

1. Route Fifty six
2. Fifty six Realities
3. Phase Shift
4. Phase Shift Reality

There are two colts and five fillies all by Dave's Reality. They will be running mid July of 1999. It will be interesting to see who runs first, the horses or the developments. Hopefully we will all be relocated to San Diego by that time.

Respectfully Yours,



Robert D. Barczewski

Cc: Mayor Golding
Louis E. Goebel, Esq.
Ann Pancoast, HOA
Frank Belock, City Engineer
Mrs. Beatrice Beck
Mr. & Mrs. Zurcher

PACIFIC HIGHLANDS RANCH SUBAREA III PLAN MEIR LETTERS OF COMMENT AND RESPONSES

Letters of comment to the draft EIR were received from the following agencies, groups, and individuals. Several comment letters received during the MEIR public review period contained accepted revisions that resulted in changes to the final MEIR text. These changes to the text are indicated by strike-out (deleted) and underline (inserted) markings. The letters of comment and responses follow.

State and Federal Agencies

U.S. Fish and Wildlife Service/California Department of Fish and Game	PR-1
United States Marine Corps	PR-9
U.S. Army Corps of Engineers	PR-11
Governor's Office of Emergency Services	PR-15
State of California Department of Parks and Recreation	PR-17
State of California Department of Conservation	PR-19
Caltrans	PR-21
California Coastal Commission	PR-23
County of San Diego (Douglas Isbell)	PR-27
County of San Diego (John Snyder)	PR-31

Local Agencies

Del Mar Union School District	PR-35
Solana Beach School District (Ellie Topolovac)	PR-52
Solana Beach School District (Linda Bechtel)	PR-57
San Dieguito Union High School District	PR-59
San Diego County Water Authority	PR-61
MTDB	PR-64

Planning Groups

Fairbanks Ranch Association	PR-65
Carmel Valley Community Planning Board	PR-67
Rancho Bernardo Community Planning Board	PR-76
Rancho Santa Fe Association	PR-77
Santa Fe Sur Association	PR-87
Rancho Glens Homeowners Association	PR-89

Conservation Groups

San Dieguito River Valley Regional Open Space Park	PR-92
California Native Plant Society	PR-97
Friends of Los Penasquitos Canyon	PR-98
Southwest Center for Biological Diversity	PR-99
San Diegans for Responsible Freeway Planning	PR-103

Conservation Groups (cont.)

San Diego County Archaeological Society
Sierra Club and Attachment

PR-106
PR-109

Other Individuals

Diocese of San Diego
Jeffrey N. Lin
Cindy Kasai
Thomas Kipps
Mark Tamsen
Silvia Tamsen
John Northrop
Robert Barczewski
Letierri-McIntyre and Associates

PR-122
PR-124
PR-126
PR-128
PR-129
PR-135
PR-138
PR-141
PR-180

Response



U.S. Fish & Wildlife Service
2730 Loker Avenue West
Carlsbad, CA 92008
(619) 431-9440
FAX: (619) 431-9618



CA Dept. of Fish & Game
1416 Ninth Street
PO Box 944209
Sacramento CA 94244-2090
(916) 653-9767
FAX: (916) 653-2588

May 18, 1998

Lawrence C. Monserrate
City of San Diego
Development Services Division
Land Development Review Division
1222 First Avenue, Mail Station 501
San Diego, California 92101

RECEIVED

MAY 20 1998

ENVIRONMENTAL SERVICES
SECTION

**Draft Master Environmental Impact Report for the Pacific Highlands Ranch (Subarea III)
Subarea Plan, City of San Diego (LDR No. 96-7918, SCH No. 97111077)**

Dear Mr. Monserrate:

The California Department of Fish and Game and U.S. Fish and Wildlife Service (Wildlife Agencies) have reviewed the Draft Master Environmental Impact Report (DMEIR) for the Pacific Highlands Ranch (Subarea III) project in the City of San Diego and offer the following comments. Our comments are based upon information provided in the April 3, 1998, DMEIR, the Biological Resources Assessment of Subarea III (Natural Resource Consultants 1998), documents associated with the City of San Diego's Multiple Species Conservation Program (MSCP), our knowledge of biological resources in the project area, and a project design/mitigation agreement negotiated between the City of San Diego, the Wildlife Agencies, local community planning and environmental groups, and Pardee Construction Company.

Subarea III of the City's Future Urbanizing Area (FUA) encompasses 2,652 acres east of Interstate 5, west of Interstate 15, and north of Del Mar Mesa. The property within Subarea III includes portions of Carmel Valley, and McGonigle and Gonzales Canyons. The proposed northern alignment alternatives for the middle segment of State Route 56 would bisect Subarea III. In addition, the site contains approximately 1,510 acres of the City's Multiple Habitat Planning Area (MHPA), the preserve planning area of the City's MSCP Subarea Plan.

The project proposes to develop residential units, a town center, schools, public facilities, and transportation networks on approximately 2,652 acres of land. The DMEIR focuses its analyses primarily on two project design alternatives. Subarea Plan 1 is designed to accommodate the SR-56 Alignment F Alternative, and Subarea Plan 2 is designed around the Alignment D Alternative. Both subarea plan alternatives propose encroachment into the MHFA in exchange

Response

Mr. Lawrence C. Monserrate
May 18, 1998
Page 2

for expansion of the MHPA in the Deer Canyon and Carmel Mountain areas of the City. Subarea Plan 1 proposes to encroach 149.9 acres into the MHPA within Subarea III, while Subarea Plan 2 would encroach 214.4 acres. Both plans propose to encroach 8.1 acres into the MHPA on the Carmel Valley Neighborhood 10 property. Within Subarea III, much of the encroachment into the MHPA would impact agricultural lands (Tier IV habitats), while expansion of the MHPA on Del Mar Mesa and Carmel Mountain would involve primarily Tier I, II and III habitats. Total impacts to all habitat types within Subarea III consist of 1,115.0 acres for Subarea Plan 1 and 1,164.5 acres for Subarea Plan 2.

The Subarea III development plan proposes to mitigate in accordance with the requirements of the City's MSCP Subarea Plan, both for direct and indirect impacts. The open space design for both Subarea Plans 1 and 2 provides sufficient on-site open space to meet the mitigation requirements for the various habitat types proposed for impact. In addition, the Subarea III project proposes to compensate for impacts into the MHPA by providing biological equivalency through expansion of the MHPA elsewhere. Specifically, the MHPA would be expanded to conserve an additional 75 acres of important habitats, with 59.7 acres being in the Tier I category (southern maritime chaparral). These additional lands would come from the conveyance of lands from Carmel Valley Neighborhood 8A property and a 60-acre parcel in Deer Canyon to the City of San Diego. Biological equivalency is proposed in the DMEIR, despite the difference in acreage of MHPA encroachment versus expansion, because of the much higher biological values of the additional lands to be conserved versus those impacted (mostly agricultural lands). In addition, the acreage of habitats in Tiers I through III gained (75 acres) and lost (64.6 acres) within the MHPA are approximately equal. Pardee Construction Company is also proposing a 100-acre mitigation bank on their Subarea III property, which would sell credits for habitat restoration that is planned. In addition, the option of establishing a 20-acres mitigation bank on Carmel Valley Neighborhood 8A is proposed should this area not be acquired as a park site.

The Wildlife Agencies offer the following comments and recommendations:

General Comments

1. The assembly and success of the MHPA is dependent upon maintaining the biological integrity of the interconnected habitats within it. It is critical that corridors are retained to ensure connectivity between habitat patches. Although encroachment into the MHPA is not encouraged, the Wildlife Agencies recognized that some adjustments, especially in areas that contain lower-quality habitat, may be necessary in limited circumstances. Our concurrence with requests for MHPA encroachment is dependent upon the City being able to make findings of biological equivalency in the project's mitigation plan. The City's MSCP Subarea Plan allows for MHPA adjustments to be made where it would result in the addition of lands with equivalent or higher biological values. Our review of the Subarea III DMEIR considered the consistency of the

1. Comment noted. Figures 3-7, 3-10, 4A-7, and 4A-8 of the Final MEIR have been revised to clarify the MHPA encroachment acreage.

Response

Mr. Lawrence C. Monserrate
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project proposal with the City's Subarea Plan and an agreement package for allowable encroachments within the MHPA, which included proposed land dedications, purchase options, mitigation banks, and constraints on brush management within certain key wildlife corridors. This agreement package is included as an attachment to this letter.

The Draft EIR for the middle segment of SR-56 has completed public review, and we have responded with our issues of concern regarding that project in our separate comment letters. In those letters we reiterated our support for any of the three northern alignment alternatives and identified how the Central Alignment alternative would result in violation of the agreements for the City's MSCP Subarea Plan. The configuration and impacts of Subarea III depend upon which alignment is chosen for SR-56. Although the DEIR for SR-56 considered four alternative alignments, only development proposals for Subarea III associated with the Northern F and D alignments (Subarea Plan 1 and Plan 2) are considered in detail in the Subarea III DMEIR. Our previous discussions on the boundary equivalency determination for Subarea III with the City, Pardee, and other interested parties focused mainly upon the Northern F Alignment (Subarea Plan 1), because the proposed impacts under the Northern D Alignment (Plan 2) were more severe. For example, the total loss of MHPA lands within Subarea III for Subarea Plan 1 is approximately 158 acres, whereas the loss of MHPA lands under Subarea Plan 2 is approximately 220 acres. We have concerns that the proposed encroachment into the MHPA in areas 8 and 9, into the wildlife corridors in McGonigle and Gonzales Canyons, under Subarea Plan 2 is too great. The placement of residential housing in these areas creates not only significant direct impacts, but also all of the indirect impacts associated with residential development. These indirect impacts to already constrained corridors are likely to be significant as well. The placement of urban development north of the SR-56 alignment in the vicinity of western McGonigle Canyon, as proposed in Subarea Plan 1, reduces the direct and indirect impacts to this key habitat linkage within the MHPA, and likely reduces management costs to maintain conserved habitat lands south of the development area. We believe that Subarea Plan 1 best minimizes direct and indirect impacts to the MHPA, and we concur with the findings of biological equivalency for encroachment by this plan into the MHPA. For findings of biological equivalency to be made for Subarea Area Plan 2 there would need to be a reduction in MHPA encroachment in Areas 8 and 9, as well as a commitment to incorporate a bridge, versus a culvert, into the design of Del Mar Heights Road where it crosses Gonzales Canyon.

Specific Comments

1. As currently proposed, Subarea Plan 2 may hinder movement of animals between Gonzales and Deer/McGonigle Canyons because of the close proximity of SR-56 and Del Mar Heights Road in concert with a culvert undercrossing. The distance between Del Mar Heights Road and the Northern D alignment is only 900 feet (versus 4,000 feet for Subarea Plan 1). For wildlife to traverse two corridor choke points, and the associated noise and lights from two major road systems, within such a short distance may reduce the

Response

Mr. Lawrence C. Monserrate
May 18, 1998
Page 4

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| <p>2 effectiveness of the Gonzales Canyon corridor. In addition, research has found that animals using an underpass should have an unobstructed view of the habitat or horizon. We believe that the Subarea Plan 2 alternative may not provide an unobstructed view and could constrain safe passage of wildlife. Therefore, the corridor's long-term biological viability could be reduced, resulting in a loss of habitat connectivity and an increase in the number of roadkills.</p> | <p>2. Comment noted.</p> |
| <p>3 The DMEIR indicates that the wildlife under-crossing for Del Mar Heights Road where it crosses Gonzales Canyon will be a culvert (e.g., page 102, last paragraph). It is our understanding that a bridge was to be constructed at this location, not a culvert. MSCP Subarea Plan Guidelines indicate that bridges are to be used in this area to facilitate wildlife movement (guideline C12, also see DMEIR page 105, paragraph 1). Please revise the DMEIR to require that a bridge crossing be constructed at this site. The bridge should be designed consistent with MSCP standards (e.g., 2:1 length-to-width ratio). Appropriate revegetation under and around bridges, as well as fencing to direct wildlife away from the roadway, should also be incorporated into the Final MEIR. Maintenance of bridges should be consistent with the MSCP guidelines that suggest wildlife corridor crossings should be kept free of trash and debris which may preclude wildlife use. We suggest that the mitigation measures in the MEIR explicitly reflect these guidelines. The incorporation of the above measures would reduce impacts to the Gonzales Canyon wildlife corridor and make the project consistent with the City's MSCP Subarea Plan.</p> | <p>3. Bridges will be located where SR-56 crosses McGonigle/Deer Canyon and where Del Mar Heights Road and SR-56 cross the north-south corridor that connects McGonigle Canyon and Gonzales Canyon. Culverts will be used in other locations along both Del Mar Heights Road and SR-56 to cross canyons that are not located in the MHPA. Figures 5-3 and 5-4 of the Subarea Plan show bridge and culvert locations for both Alignment "D" and "F." Crossing of Gonzales Canyon as shown in the MSCP Subarea Plan is not planned. Figures 3-18 and 3-19 have been revised to show the location of bridges and culverts.</p> |
| <p>4 Figure 3-9. The multi-use trail south of the western portion of SR56 should abut the southern edge of SR-56, consistent with the public access, trails, and recreation section in the City's Subarea Plan (p. 53).</p> | <p>4. Natural areas that are disturbed during bridge construction will be revegetated in accordance with the Master Revegetation Plan. As these areas are within the MHPA, they will eventually be dedicated to the City who is responsible for long-term maintenance.</p> |
| <p>5 2. Pages 52-54, Camino Santa Fe Road: Consistent with the City's Subarea Plan, we recommend that Camino Santa Fe Road, south of the Northern F Alignment of SR-56 or south of the Subarea III boundary, be eliminated. This road would impact wildlife crossings in McGonigle and Deer Canyon.</p> | <p>5. Comment noted. However, the location of the trails in the southwestern portion of the Subarea west of Camino Santa Fe have been designed to utilize existing roads and easement locations to reduce impacts on native vegetation.</p> |
| <p>6 3. Page 57, Anticipated Future Projects: All future projects should be designed and built consistent with the City's Subarea Plan. For example, land use adjacency guidelines should be followed, revegetated or landscaped areas should use only native species local to San Diego County, and the MSCP general planning policies and design guidelines should be adhered to.</p> | <p>6. As addressed in the draft MEIR, a bridge would be provided on Camino Santa Fe Road south of SR-56 to allow east-west wildlife movement within the MSCP corridor along the southern boundary of the subarea. Camino Santa Fe provides access to Subarea V. The elimination of Camino Santa Fe from the City's Circulation Element would require that the City Council direct that an amendment be initiated, studied, and heard in a public hearing. Such action is a separate project and is not part of the proposed project.</p> |
| <p>7 4. Pages 61-62, Future Discretionary Actions: The U. S. Fish and Wildlife Service cannot accept these lands, as these lands are not within an approved national wildlife refuge.</p> | <p>7. Comment noted. As described in the Land Use section (Issue 5) of the draft MEIR, the project would comply with the MSCP directives and priorities.</p> |
| <p>8 5. The Wildlife Agencies will work with Pardee on developing mitigation land banks;</p> | <p>8. Comment noted. Ownership of the referenced land will be transferred to the United States Government or other agency as directed by the City of San Diego. In this case, the land would most likely be conveyed to the City of San Diego and become part of the MHPA.</p> |

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- 9 however, these agreements will be dealt with in the future. The Final MEIR should indicate, at least in a general way, where the proposed 100-acre mitigation bank will be located within Subarea III. We are concerned about the potential for converting non-native grasslands to another habitat type for mitigation credit. There may be circumstances where conversion of habitat lands may be a net biological gain to the MHPA, but, in general, mitigation credit would be confined to disturbed lands that are revegetated. Also, please clarify at what point in the restoration process mitigation credits would become available to sell. We would want to see significant progress in habitat restoration before credits are approved for sale.
- 10
- 11 We generally concur with the Conceptual Revegetation Plan in the DMEIR. We request the opportunity to review the Master Revegetation Plan for Subarea III and the mitigation bank lands before the plan is initiated. The development and implementation of the Master Revegetation Plan should be consistent and coordinated with revegetation plans for SR-56 and FUA Subarea IV. In addition, salvage of the four MSCP covered species that would be impacted by the Subarea III project (Del Mar manzanita, coast barrel cactus, San Diego golden star, and wart-stemmed ceanothus) should be integrated with and incorporated into the revegetation plan.
- 12 7. The timing of conveyance of Pardee Construction Company mitigation lands on Carmel Valley Neighborhood 8A (Parcels A and B) to the City should be indicated in the MEIR. We recommend that conveyance occur on or before the approval of Pardee's first vesting tentative map on Subarea III.
- 13 8. It is our understanding that one element of the MHPA biological equivalency package plan was a decrease in the development footprint on Pardee-owned Carmel Valley Neighborhood 8C, such that development would be removed from the mesatop. This was not discussed in the DMEIR, but should be clearly indicated in the Final MEIR.
- 14 9. Page 82, C14: The dimensions and type of fencing or barriers should be fully described in the DMEIR, or the Final MEIR should require each future development within Subarea III to discuss this issue in detail.
- 15 10. Page 97, Figures 4A-7,8; Page 101, paragraph 3; Attachment Table C-2: Brush Management: It is our understanding that brush management would not occur within MHPA encroachment areas 5, 6, 7, and 8. All zones of brush management would occur within the development footprint to minimize development impacts in these constrained portions of the wildlife corridors in Subarea III. The DMEIR only indicates "No brush management activities would be performed within the preserve along the edges of several of the proposed encroachment areas." The Final MEIR should specifically indicate the encroachment areas 5, 6, 7, and 8 will not include brush management within the MHPA.
9. The establishment of the mitigation bank will, upon approval by the City, become part of an overall agreement between the City and Pardee that established functional equivalency. It is the intent that the mitigation bank agreements will be completed prior to dedication of any land within Neighborhood 8A.
10. Land to be restored is generally located in McGonigle Canyon and in the small north-south canyon that connects McGonigle to Gonzales Canyon, and is mapped as disked/agricultural. It is intended that credits will be sold when the revegetation effort has satisfied the success criteria in the Master Revegetation Plan, probably two to five years after initial planting.
11. Comment noted. These recommendations will be incorporated into the Master Revegetation Plan, as appropriate.
12. It is anticipated that the mitigation land within Neighborhood 8A will be conveyed with recordation of the first final map or when mitigation bank agreements are approved for Subarea III and Neighborhood 8A.
13. Pardee is processing a reduced development alternative for Neighborhood 8C which, if the phase shift is approved, will become effective and eliminate development on the mesa top area of Neighborhood 8C.
14. The C14 statement on page 82 of the draft MEIR is a direct reference to fencing and barrier requirements established by the MSCP Subarea Plan. In the impacts discussion under Land Use Issue 5, the Final MEIR has been revised to require that each development within Subarea III address the dimensions and type of fencing or barrier located along either side of the north/south-trending canyon that connects McGonigle Canyon to Gonzales Canyon.
15. The Final MEIR has been revised to indicate those locations where all brush management zones would be located outside the MHPA. This area is generally described as being on either side of Gonzales Canyon from Del Mar Highlands east to the Brown property, then down either side of the north-south canyon that connects Gonzales to McGonigle Canyon. A second area where brush management zones are located outside of the MHPA is along the north edge of Area 5.

Response

Mr. Lawrence C. Monserrate
May 18, 1998
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| <p>16</p> <p>17 11.</p> <p>18 12.</p> <p>19 13.</p> <p>20 14.</p> <p>15</p> <p>21</p> | <p>In addition, all transition slopes (approximately 27.5 acres) should be restored to native habitat. The revegetation plan requirements outlined in Exhibit I of the City's Implementing Agreement (e.g., removal of exotics, appropriate site conditions, development of a restoration plan, acquiring surety bonds) should be fully incorporated.</p> <p>Page 101: The MSCP assumes a no net loss of wetlands policy; thus, wetland habitat should be conserved through avoidance, or mitigated to ensure no net loss of functions and values. Mitigation for wetland impacts should be consistent with the City's Subarea Plan, and the U.S. Army Corps of Engineers 404 permitting and Department of Fish and Game's Streambed Alteration Agreement (1600) processes.</p> <p>Page 111: Area specific management directives must also provide specific measures to protect against detrimental edge effects (e.g., <i>Mulla clevelandii</i>, Orange-throated whiptail, etc).</p> <p>Pages 180-183: Some plant species (e.g., <i>Quercus dumosa</i>, <i>Adolphia californica</i>) that may be impacted are considered regionally sensitive, but are not covered under MSCP. Following CEQA guidelines, the loss of land supporting species eligible for listing is considered significant. Plant species found on lists 1B and 2 of the California Native Plant Society's Inventory of Rare and Endangered Vascular Plants of California (1994) are considered to be such species. The Wildlife Agencies, therefore, recommend that impacts to regionally sensitive plants not covered by MSCP should be mitigated. To offset project impacts and facilitate site reclamation of impacted or disturbed areas within or adjacent to the MHPA, we suggest salvaging and/or transplanting the above species to onsite open space. Appendix A of the City's Subarea Plan requires revegetation efforts restore certain species (e.g., <i>Ceanothus verrucosus</i>) within appropriate habitat. Consistent with the City's Subarea Plan, we recommend that disturbed areas adjacent to MHPA be revegetated or landscaped only with native species local to San Diego County.</p> <p>Page 183, <i>Plantago erecta</i>: Were phase 1 or 2 surveys conducted in Subarea III for the Quino checkerspot butterfly (<i>Euphydryas editha quino</i>)? Please include an assessment of the potential for occurrence of this federally-endangered species on Subarea III.</p> <p>It should be noted that the proposed 8.1 acres of additional impact into the MHPA proposed on Carmel Valley Neighborhood 10 is removing habitats that were considered mitigation for previous impacts from the Neighborhood 10 development. Therefore, when assessing overall impacts, an additional 8.1 acres of Tier II and III habitats should be included, for a total of 16.2 acres, to compensate for the loss of this mitigation land. It appears that, even with this additional impact, there is still sufficient conservation of habitats on Subarea III to meet the project's mitigation obligation.</p> | <p>16. Comment noted. All transition slopes will be revegetated with appropriate vegetation types in accordance with the Master Revegetation Plan.</p> <p>17. Comment noted. Any impacted wetlands would be mitigated in accordance with no net loss policies and any other applicable land use documents.</p> <p>18. Area specific management directives are addressed in the Habitat Management Plan which will be implemented by the City.</p> <p>19. Impacts to sensitive plants were identified and mitigation is provided through conveyance of land into the MHPA. The conveyed land supports vegetation where such plants are generally found.</p> <p>20. Surveys for quino checkerspot butterfly were conducted by Natural Resource Associates throughout the entire "fly period" as specified in the quino checkerspot field protocols. Results were negative and a report documenting the survey results has been included as an appendix to the Final MEIR.</p> <p>21. Comment noted. The text of the MEIR has been revised to show that 16.2 acres of Tier II and III mitigation will be provided for the increased development area within Neighborhood 10.</p> |
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Response

Mr. Lawrence C. Monserrate
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22 16. We concur with Mitigation Items 1 through 5 listed on page 198 of the DMEIR.

22. Comment noted.

23 17. Page 205. The DMEIR indicates that one option for long-term management of the MHPA lands within Subarea III is the deeding over of these lands to the San Dieguito River Park Joint Powers Authority. If this option is pursued, the City needs to retain some oversight on the management activities on these lands because its MSCP incidental take permits depend upon appropriate management activities being conducted in the MHPA. Should the San Dieguito River Park JPA not manage the lands consistent with the City's MSCP Subarea Plan the City's permits could be jeopardized.

23. Comment noted.

In summary, the Wildlife Agencies concur that the boundary equivalency determination for Subarea Plan 1 is appropriate and consistent with the City's MSCP Subarea Plan. However, at this time we do not concur that the boundary equivalency determination for Subarea Plan 2 is consistent with the MSCP because of the close proximity of roads, greater impacts to the MHPA, and poor preserve design. The Wildlife Agencies appreciate the opportunity to comment on this DMEIR. If you have any questions, please contact Bill Tippets of the California Department of Fish and Game at (619) 467-4212 or Nancy Gilbert of the U.S. Fish and Wildlife Service at (760) 431-9440.

Sincerely,

Gail L. Presley

Gail L. Presley
NCCP Program Manager
Department of Fish and Game

Nancy Gilbert

for Sheryl L. Barrett
Assistant Field Supervisor
U.S. Fish and Wildlife Service

attachment

cc: California Department of Fish and Game

Mr. Ron Rempel
Sacramento

Mr. Bill Tippets
Mr. David Lawhead
San Diego

Response

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U.S. Fish and Wildlife Service

Ms. Nancy Gilbert
Mr. Eric Hein
Carlsbad Field Office

FILE Chron
FUA III WFD
LAWHEAD/HEIN



UNITED STATES MARINE CORPS

MARINE CORPS AIR BASES WESTERN AREA EL TORO
PO BOX 95001
SANTA ANA CA 92709-5001

IN REPLY REFER TO:

11103.23
AQ/PacHi-III
4 May 1998

ECEIV

MAY 07 1998

CITY OF SAN DIEGO
LAND DEVELOPMENT REVIEW DIVISION DEVELOPMENT
ATTN EILEEN LOWER
1222 FIRST AVENUE MS 501
SAN DIEGO CA 92101

RE: NORTH CITY FUTURE URBANIZING AREA (SUBAREA III); PACIFIC
HIGHLANDS RANCH, DRAFT MASTER ENVIRONMENTAL IMPACT
REPORT LDR NO. 96-7918/SCH NO. 97111077 OF APRIL 03, 1998

Dear Ms. Lower,

This is in response to the Draft Master Environmental Impact Report for the Pacific Highlands Ranch development which addresses construction of residential housing within Sub-Area III of the North City Future Urbanizing Area. Pursuant to the Defense Base Closure and Realignment Act of 1990, Marine Corps Air Station (MCAS) El Toro and Marine Corps Air Facility Tustin will close by July 1999 and continue to transition to Miramar. Miramar will now accommodate both fixed and rotary-wing aircraft.

The proposed project will be affected by operations of military aircraft transiting to and from MCAS Miramar. The location will be affected by the Julian and Ground Controlled

- 24 Approach (GCA) Box Pattern Flight Corridors for fixed-wing operations. We recommend the analysis discuss the GCA Box Pattern projections for fixed-wing operations within the text.
- 25 Occupants will both see and hear military fixed and rotary-wing aircraft routinely and experience varying degrees of noise and vibration. We are recommending full disclosure of noise and visual impacts to all initial and subsequent purchasers, lessees, and other potential occupants. Additional information on the impacts can be obtained within the
- 26 Final Environmental Impact Statement for MCAS Miramar. Please modify the date of this reference from May, 10 to read February, 1996 on page 429. Lastly, we are
- 27 requesting a full copy of all technical appendices for retention to our files and any future Tentative or Final Map submittals for the proposed developments contained within this area.

Response

24. Comment noted. The Ground Controlled Approach (GCA) Box Pattern flight corridor according to the 1996 Final EIR for the Realignment of NAS Miramar is east of the project area and fixed-wing aircraft utilizing the GCA Box pattern would not pass over Subarea III.
25. Comment noted. The Final MEIR has been revised to include a disclosure statement under the Impacts section of Chapter 4K.
26. The Final MEIR has been revised to show February as the correct date.
27. Comment noted. The technical appendices have been sent to Col. Laura Thorton of your staff.

Response

Thank you for the opportunity to review this land use proposal. If we may be of any further assistance, please contact Ms. C. Laura Thornton at (714) 726-3702.

Sincerely,

A handwritten signature in black ink, appearing to read "L.A. Rehberger III", with a long horizontal flourish extending to the right.

L.A. REHBERGER III
Colonel, U.S. Marine Corps
Community Plans and Liaison Officer
By direction of the Commander



DEPARTMENT OF THE ARMY
LOS ANGELES DISTRICT, CORPS OF ENGINEERS
SAN DIEGO FIELD OFFICE
10845 RANCHO BERNARDO RD, SUITE 210
SAN DIEGO, CALIFORNIA 92127

REPLY TO
ATTENTION OF:

May 27, 1998

Office of the Chief
Regulatory Branch

Pardee Construction Company
c/o City of San Diego
Development Services
Land Development Review Division
Attn: Ms. Eileen Lower
1222 First Avenue, Mail Station 501
San Diego, California 92101

Dear Ms. Lower:

We have received the "Notice of Preparation of Draft Master Environmental Impact Report" (DEIR): Pacific Highlands Ranch (Subarea III) Subarea Plan in the North City Future Urbanizing Area (NCFUA). For the project, the applicant, Pardee Construction Company, plans to develop 4,974 residential units (with potential increases up to 5,456 units depending on the need for school facilities and concomitant redesignation of school sites to residential uses); a Town Center with commercial, park, open space, residential and civic area components; elementary, junior high, and high schools; a police substation; and associated public facilities and transportation network on approximately 2,52 acres. Pacific Highlands Ranch (Subarea III) is located in the City and County of San Diego, California.

28.

The DEIR should state that this activity may require a U.S. Army Corps of Engineers permit. A Corps of Engineers permit is required for the discharge of dredged or fill material into, including any redeposit of dredged material within, "waters of the United States" and adjacent wetlands pursuant to Section 404 of the Clean Water Act of 1972. Examples include, but are not limited to,

1. creating fills for residential or commercial development, placing bank protection, temporary or permanent stockpiling of excavated material, building road crossings, backfilling for utility line crossings and constructing outfall structures, dams, levees, groins, weirs, or other structures;
2. mechanized landclearing, grading which involves filling low areas or land leveling, ditching, channelizing and other excavation activities that would have the effect of destroying or degrading waters of the United States;
3. allowing runoff or overflow from a contained land or water disposal area to re-enter a water of the United States;
4. placing pilings when such placement has or would have the effect of a discharge of fill material.

Response

28. Comment noted. The draft MEIR indicates that 404 permits would be required as future approvals as development proposals are processed in the future.

Response

-2-

Enclosed you will find a permit application form and a pamphlet that describes our regulatory program. Please include this letter in the DEIR. If you have any questions, please contact me at (619) 674-5384. Please refer to this letter and 98-20202-DZ in your reply.

Sincerely,

A handwritten signature in black ink, appearing to read "David A. Zoutendyk", with a stylized flourish at the end.

David A. Zoutendyk
Project Manager
Regulatory Branch

Enclosures

PR-12



PETE WILSON
GOVERNOR

PAUL FARNER
GOVERNOR

State of California

GOVERNOR'S OFFICE OF PLANNING AND RESEARCH

1400 TENTH STREET
SACRAMENTO 95814

Response

May 18, 1998

EILEEN LOWER
CITY OF SAN DIEGO
1222 FIRST AVE MS 501
SAN DIEGO, CA 92101

Subject: SUBAREA III/PACIFIC HIGHLANDS RANCH SCH #: 97111077

Dear EILEEN LOWER:

The State Clearinghouse has submitted the above named draft Environmental Impact Report (EIR) to selected state agencies for review. The review period is now closed and the comments from the responding agency(ies) is(are) enclosed. On the enclosed Notice of Completion form you will note that the Clearinghouse has checked the agencies that have commented. Please review the Notice of Completion to ensure that your comment package is complete. If the comment package is not in order, please notify the State Clearinghouse immediately. Remember to refer to the project's eight-digit State Clearinghouse number so that we may respond promptly.

Please note that Section 21104 of the California Public Resources Code requires that:

"a responsible agency or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency."

Commenting agencies are also required by this section to support their comments with specific documentation.

These comments are forwarded for your use in preparing your final EIR. Should you need more information or clarification, we recommend that you contact the commenting agency(ies).

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

ANTERO A. RIVASPLATA
Chief, State Clearinghouse

Enclosures
cc: Resources Agency

PR-13

Notice of Completion

Appendix F

See NOTE below

Mail to: State Clearinghouse, 1400 Tenth Street, Sacramento, CA 95814 916/445-0613

SCH # 97111077

Project Title: PACIFIC HIGHLANDS RANCH SUBAREA PLAN (AREA SUBAREA III)
 Lead Agency: CITY OF SAN DIEGO
 State Address: 1322 FIRST AVE MS 501
 City: SAN DIEGO CA Zip: 92101
 Contact Person: Patricia Lewis
 Phone: (619) 236-6362
 County: SAN DIEGO

Project Location
 County: SAN DIEGO City/Nearest Community: SAN DIEGO (Future Urbanizing Area)
 Gross Acreage: NORTH CITY FUTURE URBANIZING AREA Total Acres: 265.2
 Assessor's Parcel No.: 789, 10, 14, 15 Range: 36 Base: SB
 Within 2 Miles: State Hwy #: I-5, I-15, SR-56 Waterways: SAN DIEGO RIVER, COOKS RIVER, COOKS RIVER, COOKS RIVER
 Airports: NA Railways: NA Schools: NA

Document Type

CEQA: ☐ NOP ☐ Supplement/Subsequent ☐ NEPA: ☐ NOI ☐ Other: ☐ Joint Document
☐ Early Cons ☐ EIR (Prior SCH No.) ☐ EA ☐ Final Document
☐ Neg Dec ☐ Other ☐ Draft EIS ☐ FONSI

Local Action Type

☐ General Plan Update ☒ Specific Plan ☐ Rezoning ☐ Amendment
☒ General Plan Amendment ☐ Master Plan ☐ Precinct ☐ Redevelopment
☐ General Plan Element ☐ Planned Unit Development ☐ Use Permit ☐ Coastal Permit
☐ Community Plan ☐ Site Plan ☐ Land Division (Subdivision, Parcel Map, Tract Map, etc.) ☒ Other: UPP, MAP 9-1, 10-1, 11-1, 12-1, 13-1, 14-1, 15-1, 16-1, 17-1, 18-1, 19-1, 20-1, 21-1, 22-1, 23-1, 24-1, 25-1, 26-1, 27-1, 28-1, 29-1, 30-1, 31-1, 32-1, 33-1, 34-1, 35-1, 36-1, 37-1, 38-1, 39-1, 40-1, 41-1, 42-1, 43-1, 44-1, 45-1, 46-1, 47-1, 48-1, 49-1, 50-1, 51-1, 52-1, 53-1, 54-1, 55-1, 56-1, 57-1, 58-1, 59-1, 60-1, 61-1, 62-1, 63-1, 64-1, 65-1, 66-1, 67-1, 68-1, 69-1, 70-1, 71-1, 72-1, 73-1, 74-1, 75-1, 76-1, 77-1, 78-1, 79-1, 80-1, 81-1, 82-1, 83-1, 84-1, 85-1, 86-1, 87-1, 88-1, 89-1, 90-1, 91-1, 92-1, 93-1, 94-1, 95-1, 96-1, 97-1, 98-1, 99-1, 100-1

Development Type

☐ Residential: Units _____ Acres _____ Employees _____
☐ Office: Sq. Ft. _____ Acres _____ Employees _____
☐ Commercial: Sq. Ft. _____ Acres _____ Employees _____
☐ Industrial: Sq. Ft. _____ Acres _____ Employees _____
☐ Educational _____
☐ Recreational _____
☐ Water Facilities: Type _____
☐ Transportation: Type _____
☐ Mining: Mineral _____
☐ Power: Type _____ Waste _____
☐ Waste Treatment: Type _____
☐ Hazardous Waste: Type _____
☐ Other: _____

Project Issues Discussed in Document

☒ Aesthetic/Visual ☐ Flood Plain/Flooding ☐ Schools/Universities ☐ Water Quality
☒ Agricultural Land ☐ Forest Land/Fire Hazard ☐ Septic Systems ☐ Water Supply/Groundwater
☐ Air Quality ☐ Geology/Seismic ☐ Sewer Capacity ☐ Wetland/Riparian
☒ Archeological/Historical ☐ Minerals ☐ Soil Erosion/Compaction/Grading ☐ Wildlife
☐ Coastal Zone ☐ Noise ☐ Solid Waste ☐ Growth Inducing
☒ Drainage/Absorption ☐ Population/Housing Balance ☐ Toxic/Hazardous ☐ Land Use
☐ Economic/Jobs ☐ Public Services/Facilities ☐ Traffic/Circulation ☐ Cumulative Effects
☐ Fiscal ☐ Recreation/Parks ☐ Vegetation ☒ Other: UPP

Present Land Use/Zoning/General Plan Use

ESTATE RESIDENTIAL / A-1-10 / FUTURE URBANIZING - AGRICULTURE,
PROJECT DESCRIPTION: SUBAREA PLAN FOR FUTURE DEVELOPMENT OF LP TO

5456 RESIDENTIAL UNITS, A TOWN CENTER WITH COMMERCIAL, PARK, OPEN SPACE,
RESIDENTIAL AND CIVIC AREA COMPONENTS; SCHOOLS; A POLICE SUBSTATION;
ASSOCIATED PUBLIC FACILITIES AND TRANSPORTATION NETWORK CAN
APPROXIMATELY 3652 ACRES IN THE NORTH CITY FUTURE URBANIZING
AREA. A PHASE II MAP IS REQUIRED TO IMPLEMENT THE SUBAREA PLAN.

State Clearinghouse Contact: Mr. Chris Belsky
 (916) 445-0613

Project Sent to the following State Agencies

State Review Began: 4.3.96
 Dept. Review to Agency: 5.11
 Agency Rev to SCH: 5.15
 SCH COMPLIANCE: 5.18

☒ Resources ☐ State/Consumer Svc
☐ Boating ☐ General Services
☐ Coastal Comm ☐ Cal/EPA
☐ Coastal Cons ☐ ARB
☐ Colorado Rvr Bd ☐ CA Waste Mgmt Bd
☐ Conservation ☐ SWRCB: Grants
☒ Fish & Game # 5 ☐ SWRCB: Delta
☐ Delta Protection ☐ SWRCB: Wtr Quality
☐ Forestry ☐ SWRCB: Wtr Rights
☒ Parks & Rec/OHP ☐ Reg. WQCB # 9
☐ Reclamation ☐ DTSC/CTC
☐ BCDC ☐ Yth/Adlt Corrections
☐ DWR ☐ Corrections
☒ OES ☐ Bus Transp Hous

Please note SCH Number on all Comments

97111077

Please forward late comments directly to the Lead Agency

Response



**GOVERNOR'S OFFICE OF EMERGENCY SERVICES
DISASTER ASSISTANCE PROGRAMS BRANCH**

Hazard Mitigation Section
Post Office Box 419023
Sacramento, California 95741-9023
Phone: (916) 464-1014
Fax: (916) 464-1019



RECEIVED

APR 24 1998

RECON

April 17, 1998

(RECEIVED)

APR 23 1998

DEVELOPMENT

Eileen Lower, Environmental Planner
City of San Diego, Development Services
Land Development Review Division
1222 First Avenue, Mail Station 501
San Diego, CA 92101

Dear Ms. Lower:

**SUBJECT: DRAFT MASTER ENVIRONMENTAL IMPACT REPORT (DMEIR)
NORTH CITY FUTURE URBANIZING AREA
PACIFIC HIGHLANDS RANCH SUBAREA**

The Governor's Office of Emergency Services (OES) appreciates the opportunity to comment on the City's DMEIR. As you know, flood, fire and seismic disasters in California over the past 20 years have cost the federal taxpayer and the people of the State billions of dollars. Clearly, to mitigate these issues, the best opportunity is during the planning stages of our built environments.

- 29 To this end, we suggest that the risk of flood, fire and seismic hazards be clearly identified and
30 evaluated as well as the standards to which those risks will be mitigated. Further, we suggest that specific hazard mitigation plans be used to guide development of the La Zanja and Gonzales Canyons in the San Dieguito Hydrographic Unit and McGonigle and Deer Canyons in the Penasquitos Hydrographic Unit.

The following documents may be helpful in developing ordinances and plans:

FLOOD HAZARD MITIGATION PLAN (OES) November 1996
HAZARD MITIGATION OPPORTUNITIES FOR CALIFORNIA (The State/Federal Hazard Mitigation Survey Team Report) October 1997
CALIFORNIA AT RISK, REDUCING EARTHQUAKE HAZARDS (Seismic Safety Commission) September 1992
CALIFORNIA FIRE PLAN, A FRAMEWORK for MINIMIZING COSTS and LOSSES from WILDLAND FIRES (California Board of Forestry) March 1996

Response

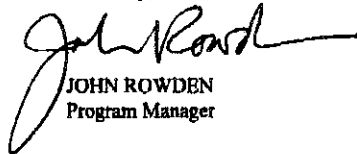
29. A discussion of flood hazards and appropriate mitigation measures are included in Chapter 4.D, Hydrology; and seismic hazards and mitigation measures are included in Chapter 4.H, Geology, of the draft MEIR. With respect to fire hazards, future development proposals would be required to comply with the brush management regulations of the city of San Diego.
30. The Pacific Highlands Ranch Subarea Plan does not entail development of McGonigle, La Zanja, Gonzales, and Deer Canyons. These areas would be preserved as natural open space in the MSCP open space preserve.

Response

Eileen Lower
April 17, 1998
Page Two

If you have any questions or concerns, please contact me at (916) 464-1014, or Ken Bryant, Hazard Mitigation Program, at (916) 464-1099.

Sincerely,



JOHN ROWDEN
Program Manager

c: The Governor's Office of Planning and Research

Paula Schulz, State Hazard Mitigation Officer

DEPARTMENT OF PARKS AND RECREATION

San Diego Coast District
9509 Waples Street, Suite 200
San Diego, CA 92121
619-642-4200



May 15, 1998

RECEIVED

MAY 15 1998

ENVIRONMENTAL ANALYSIS
SECTION

Eileen Lower
Development Services
City of San Diego
1222 First Avenue, MS 501
San Diego, CA 92101

Dear Ms Lower:

This letter is in response to the draft Master Environmental Impact Report, SCH #97111077, Pacific Highlands Ranch (Subarea III). A substantial portion of the project lies within the watershed of Los Peñasquitos Marsh Natural Preserve. Los Peñasquitos is a 636 acre lagoon system which managed by the California Department of Parks and Recreation. Any activities which contribute to unnatural levels of sedimentation and freshwater inflow into Los Peñasquitos Marsh can threaten the sensitive wetland habitats of this Preserve. In addition a portion of the project is part of the Multiple Habitat Planning Area (MHPA) of which Torrey Pines State Reserve is a part. Thus, impacts to wildlife populations or habitat within the project are likely to affect State Park lands. In particular we offer the following comments:

31. Page 29, Paragraph 1. The Draft EIR asserts that "...the natural open space described below under both subunit plans is functionally equivalent with the adopted MHPA..." but cites no source or support for the statement.
32. Figure 3-6. Indicates that the "Expanded MHPA area" will include 22-24 single family units in a 8.1 acre area. At that density it seems unlikely that such a parcel would retain any habitat value.
33. Page 34, paragraph 1. It is difficult to assess the value of the mitigation bank without knowing its location. MHPA lands have value only because of their location.
34. Pages 97-98, Uses Allowed in the MHPA Preserve. Such uses should be evaluated to insure that they do not negatively affect habitat connectivity.
35. Page 98, paragraph 3. "...both plans have been deemed functionally equivalent with the MHPA as proposed in the MSCP." By whom?
36. Page 98 paragraph 4, page 99, paragraph 1, page 104, paragraphs 2 & 8. These statements suggest that impacts in Subarea III are being mitigated by donations of land in Carmel Valley Neighborhood 8A. However, the draft Environmental impact report for Neighborhood 8A (SCH 97111053) contains three equally weighted development proposals which would set aside differing amounts and configurations of land. It is impossible to evaluate the adequacy of mitigations for impacts in Subarea III without knowing which option in neighborhood 8A is being pursued. It also seems as if two projects (Subarea III, and Neighborhood 8A) are trying to claim the same mitigation.
37. Page 102, paragraph 7. "...the natural open space system proposed under Subarea Plan I... would successfully function in the same manner as that proposed by the MSCP..." what is the basis for this assertion?
38. Page 106, paragraph 1. How will compliance with MHPA policies and Guidelines be monitored and enforced?
39. Pages 108-110, Compliance with MHPA Management Recommendations. This section states that the implementation of Priority 1 directives is mandatory and that the implementation of Priority 2 and 3 directives is discretionary. Why then are Priority 1 directives all related to establishing public access, while Priority 2 and 3 directives are related to the actual protection and management of the resource? The priorities seem a bit distorted.

Response

31. The finding of functional equivalency has been made by the City and concurred with by the State Department of Fish and Game and the US Fish and Wildlife Service per the requirements of the MSCP and Implementing Agreement. The rationale for the necessary finding is discussed in the Land Use section of this MEIR. See also the letter of comment from the Department of Fish and Game and the USFWS on the draft MEIR.
32. The additional 22-24 units within Neighborhood 10 are not located within the MHPA.
33. Land proposed to be in the mitigation bank is located within the MHPA and is now mapped as "disked/agricultural."
34. Section 1.4.1 of the already approved City of San Diego MSCP Subarea Plan already allows such uses and includes measures to ensure they are properly located to minimize impacts.
35. As described in the draft MEIR, the City of San Diego, subject to concurrence with the U.S. Fish and Wildlife Service, is responsible for making this determination.
36. The referenced paragraphs at page 98 paragraph 14, page 99 paragraph 1, and page 104 paragraphs 2 and 8 contain a discussion regarding the boundary adjustment of the MHPA in the City's MSCP Subarea. The referenced paragraphs are not intended to and do not address provision of mitigation for potential impacts created by the project. The proposed boundary adjustment which includes relinquishment of private development rights upon Parcels A and B in Neighborhood 8A, will occur if a successful phase shift is approved by the voters in November of 1998.
37. See response 31 above.
38. The City of San Diego is responsible for monitoring and enforcing MHPA planning policies and guidelines.
39. The prioritization of the management directives was already established in the City of San Diego MSCP Subarea Plan. There is no proposal to change the directives. This MEIR addresses how the proposed project responds to the already approved management directives.

Response

- 40 • Page 211, paragraph 2. The statement "...a sand deposit at the lagoon entrance which closes the lagoon most of the year." is no longer true. In each year since 1992 the lagoon mouth has been closed for less than two months.
- 41 • Page 211, paragraph 4. It is debatable as to how much protection the facilities in the lagoon offer in terms of controlling sediment. The impoundment of sediment by these facilities has aggraded the lagoon bed and contributed to changes in the vegetation of the eastern and southern portions of the lagoon.
- 42 • Page 221, number 11. Much damage has been caused to the environment at Los Peñasquitos Lagoon by the failure of upstream erosion and sedimentation control devices. It is imperative that the parties responsible for maintaining and monitoring these devices be clearly identified prior to construction and that regular monitoring reports be made to a public agency with enforcement powers such as the Regional Water Quality Control Board (RWQCB).
- 43 • Page 223, paragraphs 4 and 5. The impacts of increased sediment transport into the lagoon is mentioned. However, increases in the amounts and duration of fresh water flows into the lagoon will have impacts as well and are not discussed. Such flows change the balance between fresh and salt water in the lagoon channels and encourage the intrusion of fresh and brackish water plants into salt marsh habitat. Records from the USGS gauging station in Los Peñasquitos Creek from 1965-1988 reveal that year round fresh water flows in Peñasquitos Creek began in 1980. Since that time aerial photographs have shown a rapid intrusion of willow scrub and associated exotic plants such as *Catalpa bignonioides* and *Arundo donax* into the southern end of the lagoon.

We greatly appreciate the opportunity to comment on the Draft EIR. The size of this project is considerable and is likely to have profound impacts on Torrey Pines state Reserve and Los Peñasquitos Marsh Natural Preserve. Consideration of our concerns in the Final EIR is likely to encourage the protection of these valuable resources. If our staff can assist you in any way, please call Michael Wells at (619) 452-8732.

Sincerely,



Edward Navarro
Superintendent

cc: Projects Coordinator, The Resources Agency, c/o Nadell Gayou, 1020 Ninth Street, 3rd Floor, Sacramento, CA 95814

Richard Rayburn, Chief, Resource Management Division, California Department of Parks and Recreation,
P O Box 942896, Sacramento, CA 94296-0001

- 40. Comment noted.
- 41. Comment noted.
- 42. As tentative maps are processed within Subarea III, conditions of approval will require that Best Management Practices for the control of sediment be implemented to minimize impacts to Los Peñasquitos Lagoon.
- 43. Comment noted. The Subarea Plan requires that stormwater detention facilities will be implemented with the approval of tentative maps.

Response

State of California

The Resources Agency

MEMORANDUM

TO: Project Coordinator
Resources Agency

Date: May 13, 1998

Ms. Eileen Lower
City of San Diego, Developmental Services
Land Redevelopment Review Division
1222 First Avenue, Mail Station 501
San Diego, CA 92101

R E C E I V E D

MAY 13 1998

ENVIRONMENTAL RELATIONS
SECTION

From: Department of Conservation
Office of Governmental and Environmental Relations

Subject: Draft Master Environmental Impact Report for the Pacific Highlands
Ranch (Subarea III) Subarea Plan (NCFUA) - SCH# 97111077

The Department of Conservation (Department) and the State Mining and Geology Board (Board) have reviewed the Pacific Highlands Ranch Subarea Plan. The Board designates areas having mineral resources of regional and statewide economic significance. The Department works closely with the Board to establish State policy for the conservation and development of mineral resources. The Mineral Classification and Designation process was established to ensure, through appropriate lead agency policies and procedures, that mineral deposits of regional significance are available when needed. The Department offers the following comments.

The project proposes future development of up to 5,456 residential units; a town center with commercial, park, open space, and civic area components; and the associated public facilities and transportation network on 2,652 acres in the North City Future Urbanizing Area. A portion of the proposed development is within areas designated by the Board as Sector J(5) of the Western San Diego County Production-Consumption (P-C) Region. Sector J(5) is described in the Division of Mines and Geology Special Report 153, Mineral Land Classification: Aggregate Materials in the Western San Diego County Production-Consumption Region. According to this 1982 report, Western San Diego County has a permitted aggregate supply that will last only 32 years, and this P-C Region will face a shortfall of aggregate reserves of about 330 million tons by the year 2030 (50 year time frame of report).

Public Resources Code Sections 2762 and 2763 describe the responsibilities of the lead agency prior to its making a decision involving areas designated as being of regional mineral significance. A lead agency shall determine and demonstrate that its decisions are in accordance with the lead agency's mineral resource management policies and shall, also, in balancing mineral values against alternative land uses.

Response

Ms. Eileen Lower

May 13, 1998

Page

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.

44. The DEIR is not clear whether the City of San Diego has determined and demonstrated that the proposed development is in accordance with the established mineral resource management policies of the City. California Code of Regulations (CCR) Section 3675 defines incompatible land use with respect to Mineral Resources Management Policies. The lead agency must demonstrate how this proposed project integrates with its own mineral resources management policies contained in its general plan and with CCR 3675. The mineral resource amounts discussed in the DEIR refer to mapped resources, but not to be permitted reserves. It is these permitted reserves upon which the P-C Region will depend for its aggregate needs. The Department recommends that the Final EIR include information regarding how the proposed project integrates with City's mineral resource management policies.

The Department appreciates the opportunity to comment on the DEIR. For further clarification and assistance with this issue, you may wish to contact John G. Parrish, Executive Officer, State Mining and Geology Board at (916) 322-1082. If I can be of any assistance, contact me at (916) 445-8733.



Jason Marshall
Assistant Director

cc: John Parrish, State Mining and Geology Board

44. The City's mineral resource management policies are contained in the "City of San Diego Progress Guide and General Plan" goals for protecting major mineral deposits against encroachment by land uses which would make their extraction undesirable or impossible; and extraction of resources with minimal harm and disturbance to adjacent persons and properties. There is currently no zoning classification designed to protect present or future construction material resources. Mineral extraction is allowed only through approval of a Conditional Use Permit (CUP). The MRZ-2 zones (as defined by the California Department of Conservation, Division of Mines and Geology 1982) are those areas containing the mineral resources where issuance of CUPs (or permitted resources) would be appropriate. The approximately 116 acres of designated MRZ-2 zone lands in the subarea are located in areas that are proposed to be open space within the Multiple Species Conservation Program (MSCP) areas of the project. The goal of protecting the mineral resources would be met in that no substantial permanent structures would be built in these areas. However, it is acknowledged that mineral extraction is considered an incompatible use within the areas proposed for conservation through the City's MSCP, and it is unlikely that these areas would be available as permitted resources in the foreseeable future. Therefore, the MEIR identifies a significant unmitigated cumulative effect.

DEPARTMENT OF TRANSPORTATION

DISTRICT 11, P. O. BOX 85406, SAN DIEGO, CA 92186-5406

PHONE (619) 688-8002

TDD (619) 688-6424



May 15, 1998

11-SD-056
P.M. 3.0 (KP 3.3-12.9)5/18/98
e

Mr. Chris Belsky
State Clearinghouse
1400 Tenth Street
Sacramento, CA 95814

Dear Mr. Belsky:

Draft Master EIR for Pacific Highlands Ranch (Subarea III) - SCH 97111077

Caltrans District 11 comments are as follows:

- | | | |
|---|--|---|
| <p>45</p> <p>46</p> <p>47</p> <p>48</p> <p>49</p> <p>50</p> <p>51</p> <p>52</p> | <ul style="list-style-type: none"> • All Caltrans signalized intersections should be analyzed with the intersecting lane vehicle (ILV) method per Topic 406 of the Highway Design Manual. • The City of San Diego is currently preparing an Environmental Impact Report (EIR) for the middle portion of State Route 56 (SR-56). Four alternatives are being evaluated: Central, Northern, Modified Northern - D, and Modified Northern - F. Upon review of the Draft Subarea Plan, it appears that all four alternatives directly affect this Subarea. Because a preferred alternative for SR-56 has not been determined, equal consideration should be given within the Subarea Plan. It appears from the document that a preference is given to the Northern Modified D and F alternatives. The Subarea Plan should also be consistent with any proposed interchange configurations along SR-56. • Adequate noise mitigation for SR-56 may be necessary as part of the proposed community. Mitigation should be based on the ultimate configuration of SR-56 and Year 2020 traffic volumes. Additional mitigation should not be required for this development when SR-56 is initially constructed or subsequently improved. Delay to the highway projects could occur if the State highway improvements were to cause a significant noise impact. • Caltrans supports the concept of "fair share contributions" on the part of developers toward present and future mitigation on SR-56. Specifically, we recommend construction of a left turn lane for HOV bypass at the I-5 southbound on-ramp from westbound Via de la Valle (Intersection #28). • SR-56 has been incorrectly labeled as State Route 66 on Exhibits 4-2, 4-3 and 4-4. • The Third Interchange shown on Exhibit 4-2 should be labeled as "Possible Third Interchange". • Transportation Analysis Appendix A, page 25; the future AM peak period volume of 2998 on the I-15 northbound at SR-56 ramps (intersection #63) is not deliverable. Please revise this volume. | <p>45. The traffic analysis for Subarea III was prepared in accordance with regional Congestion Management Program (CMP) guidelines and the City of San Diego Traffic Impact Study Manual. Based on both guidelines Highway Capacity Manual (HCM) analysis is the required methodology for peak hour intersection analysis.</p> <p>46. The proposed project as described in the MEIR addresses Modified Northern D and Modified Northern F as Subarea Plans 1 and 2, respectively. The Central Alignment is included as a project alternative and the Northern Alignment is similar to the two modified alignments.</p> <p>47. See response above.</p> <p>48. Comment noted.</p> <p>49. As shown on Table 20 of the traffic report, Subarea III is projected to have only 171 daily trips at the Via de la Valle/I-5 interchange. Therefore, any improvement at this interchange should not be a condition of Subarea III or require a fair share contribution because project impacts are below the level of significance threshold.</p> <p>50. Comment noted.</p> <p>51. The final MEIR and the traffic report will be revised to change "Third interchange to "Possible Third Interchange."</p> <p>52. The 1998 volume is the westbound through move which can be accommodated based on the HCS analysis. For the three through lanes the volume is only equivalent to about 1,000 vehicles per lane which is deliverable.</p> |
|---|--|---|

Response

Mr. Chris Belsky

May 15, 1998

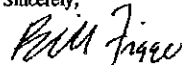
Page 2

Response

- 53 • The ramp meter queue analysis for the I-5 southbound/Carmel Valley Road intersection (#32) should be revised to show metering of the SR-56 to I-5 southbound connectors.
- 54 • The impacts of substantial ramp meter queues to adjacent intersections should be discussed, including where the cars will store.

The Route Manager for SR-56 is Ed Hajj at (619) 220-5433. For information regarding traffic studies, please contact Dick Coward, Traffic Operations Branch Chief, at (619) 467-4328.

Sincerely,



BILL FIGGE, Chief
Planning Studies Branch

BF/LS:hgs

53. The queuing analysis has been revised to include SR-56 to I-5 southbound direct connector in the AM peak.
54. This discussion has been added to the traffic report.

CALIFORNIA COASTAL COMMISSION

SAN DIEGO AREA
3111 CAMINO DEL RIO NORTH, SUITE 200
SAN DIEGO, CA 92108-1725
(619) 521-8036



May 28, 1998

Response

City of San Diego
Development Services
Land Development Review Division
Attn: Eileen Lower
1222 First Avenue, MS 501
San Diego, CA 92101

Re: NCFUA Subarea III (Pacific Highlands Ranch)

Dear Ms. Lower:

Thank you for the opportunity to comment on the Draft Master Environmental Impact Report for the above-referenced project. I apologize for the lateness of these comments, but wanted to go on record with Coastal Act concerns, since an amendment to the City's Local Coastal Program (LCP) is proposed therein to incorporate changes in the North City LCP segment (specifically in the Future Urbanizing Area). Also, coastal development permits from this agency may be required for portions of the project, depending on the timing of plan implementation. For that purpose, the following general comments are offered:

55

The draft document includes two potential land use plans; which will be implemented depends on which alternative alignment for the middle segment of Route 56 is ultimately chosen. Only a portion of Subarea III is within the coastal zone - perhaps a quarter of the subarea overall. The portion of the subarea within the coastal zone is designated primarily as open space under either plan. There are proposed to be small areas of low density, and potentially peripheral, residential development along the northern border of the coastal zone and a designated high school site appears to fall partially within the coastal zone as well.

56

There are several jurisdictional considerations concerning the proposed land use plan alternatives. The City of San Diego's certified Local Coastal Program (LCP) includes, among many other documents, the North City Future Urbanizing Area (NCFUA) Framework Plan, the North City LCP Land Use Plan Addendum and portions of the City's municipal code; the City issues coastal development permits for most of its geographic area within the coastal zone pursuant to the LCP. However, except for Subarea V, which the Commission certified in March, 1997, the NCFUA represents an

55. Comment noted.

56. These comments regarding the status of the various planning documents relevant to the Coastal Zone are acknowledged.

May 28, 1998

2

Response

area of deferred certification, meaning the planning process is not yet complete and coastal permit jurisdiction temporarily remains with the Coastal Commission. Although the certified NCFUA Framework Plan would be considered as guidance, Chapter 3 of the Coastal Act is the legal standard of review for any permit decisions made by the Coastal Commission. Further complicating matters is the status of the Multiple Species Conservation Program (MSCP). Although the City has formally adopted the MSCP and uses it extensively in its permit decision-making process, the MSCP has not been reviewed or certified by the Coastal Commission as yet. Therefore, although the Commission has supported the concept of regional conservation planning, it cannot even consider the MSCP a guidance document at this time. Again, Coastal Commission permit decisions would rely entirely on Chapter 3 of the Coastal Act.

- 57 Once the Commission has effectively certified a Subarea III plan, it is expected that the City would assume coastal development permit authority for the portions of the subarea in the coastal zone. Although Subarea III is east of I-5 and well removed from the coastline, any City-issued coastal permit for development within 100 feet of the top of the banks of any stream or within 100 feet of any delineated wetland (such as riparian corridors or vernal pools) would be appealable to, or by, the Coastal Commission. The various documents comprising the certified LCP would then be the standard of review for any City-issued coastal development permits. At this time, however, the plans and regulations considered by the City in its coastal permit decisions cannot include changes which are part of the City's zoning code update and associated land use plan modifications, since the updated code and related modifications have not yet been certified by the Commission and are thus not applicable in the coastal zone. This situation may have changed by the time Subarea III is submitted to the Coastal Commission for review and potential certification, since Commission staff is currently reviewing the zoning code update and related documents, which will probably be acted on by the Commission before the end of 1998.
- 58 In order for the Commission to certify an LCP land use plan component, the plan must be found consistent with Chapter 3 of the Coastal Act. With respect to the Commission's review of the subarea plan, Sections 30230, 30231 and 30233 (protection of marine resources, including water quality and wetland issues), 30240 (development in or adjacent to environmentally sensitive habitats), 30250 (siting of new development in areas contiguous with existing development to minimize impacts), 30251 (protection of scenic resources) and 30253 (development in hazardous areas, such as steep slopes and floodplains) appear to be most applicable to the proposed plan. Until a specific alternative is chosen, it is not possible to say whether, or to what extent, all of these policies would apply. It is also not possible to tell from the draft EIR whether identified impacts are within or outside the coastal zone. However, based on the environmental review conducted to date, it would appear that the Resource Protection Ordinance (RPO) alternative has the least impacts overall and thus would be most readily endorsed by Commission staff.

57. Comment acknowledged.

58. The majority of the project area within the Coastal Zone would be comprised of MHPA open space. There are also small areas of low density residential development along with the existing Rancho Glens Estates within the Coastal Zone under both proposed Subarea Plans. In general, impacts to Coastal Zone lands are discussed in the Land Use chapter of the draft EIR under "Consistency with the Local Coastal Program." The conclusion of the draft MEIR is that both proposed plans are consistent with the intent of the North City LCP and no mitigation is required. With respect to the RPO Alternative presented in the MEIR, both this alternative and the proposed project land use plans are nearly identical with respect to development within the Coastal Zone.

May 28, 1998

3

Response

59 No mention was made of the Los Peñasquitos Lagoon Enhancement Fund, a water quality mitigation measure that has been in effect for many years now, and is applied to both City of San Diego and Coastal Commission permits within the lagoon watershed. It has been used over the years to fund a number of enhancement activities within the lagoon, and to open the lagoon mouth when biological conditions warrant that action. The EIR indicates that portions of the subarea drain to Carmel Valley, and thus into Los Peñasquitos Lagoon. Therefore, that fee would be applicable to any coastal zone project within the Los Peñasquitos watershed when individual property owners bring forward their development proposals.

60 Finally, with respect to general comments, it is unfortunate that several different documents must be consulted to get the full picture of proposed future development. The subject draft EIR references the Route 56 EIR for specific impacts of that development, even though the impacts may occur within the subject subarea. Also, the overall MSCP boundary adjustments and proposed mitigation land banks involve two Carmel Valley neighborhoods (8A and 10), and Subarea V as well as the subject Subarea III. Impacts associated with these are addressed in separate plans and/or environmental documents. Because these various items are on separate timelines, it may be necessary to address them individually, but it makes it more difficult to understand the total ramifications of North City buildout. It should be noted that the modifications to Neighborhoods 8A and 10 and Subarea V will require certification by the Coastal Commission to be applicable within the coastal zone.

The following specific comments are also offered:

- 61 On Page 29, the EIR indicates that the MSCP has superseded the Framework Plan. Within the coastal zone, however, the MSCP has not been certified by the Coastal Commission and the Framework Plan is still the applicable document.
- 62 On Page 92, the EIR defines wetlands as any lands meeting any of three distinct criteria (vegetation, soils or hydrology), but then states that wetlands in Subarea III were identified by vegetation type alone. Might there not be wetlands occurring on-site that would be defined by soils or hydrology even though wetland vegetation species are not present?
- 63 Tables 4C-5 and 4C-6 provide the City's anticipated mitigation ratios for impacts to biological resources; these ratios are based on the MSCP provisions and the Environmentally Sensitive Lands (ESL) regulations in the zoning code update. Since neither of these documents have been certified by the Commission, they are not applicable within the coastal zone and the ratios listed in the table are not fully consistent with historic Commission practices. Where wetland impacts have been accepted by the Coastal Commission at all (based primarily on whether or not the project can be found

59. It is acknowledged that any coastal zone project within the Los Peñasquitos watershed would be subject to the Los Peñasquitos Lagoon Enhancement Fund fees at the time development permits are processed. The requirement for payment of fees is contained in the City's Coastal Development Permit ordinance (Section 105.0209). Payment of the fees constitutes adherence to the law; and, as such, would not be considered "mitigation." A brief discussion of the Los Peñasquitos Lagoon Enhancement Fund fee requirements has been added to the Hydrology/Water Quality section of the MEIR.

60. These comments are acknowledged. While it is true that several documents may be required for a detailed understanding of the specific impacts related to the various proposed developments in the referenced area, the Cumulative Effects section of the Pacific Highlands Ranch (Subarea III) Subarea Plan MEIR provides an overview of impacts in the area resulting from past, present, and reasonably foreseeable projects.

61. It is acknowledged that the MSCP has not yet been certified by the California Coastal Commission and the Framework Plan is still the applicable planning document for lands falling within the Coastal Zone.

62. At the time federal Section 404 Clean Water Act permits are processed for future developments within Subarea III, precise wetland delineations would be required by the U.S. Army Corps of Engineers to ensure that wetland impacts are mitigated as appropriate.

63. It is acknowledged that the MSCP has not yet been certified by the California Coastal Commission and that until such time that it is, the traditional mitigation ratios for Coastal Zone biology impacts would be enforced for development permits within the Coastal Zone.

May 28, 1998

4

Response

consistent with Section 30233 of the Coastal Act), the typical ratio for riparian habitat impacts, which would include the identified impacts to southern willow scrub and mule fat scrub, has been 3:1. Impacts to freshwater marsh have been mitigated in past Commission actions at ratios as high as 4:1, although it appears no impacts to this resource are anticipated with either plan alternative.

- 64 This concludes staff's comments at this time, which have been based on only a limited review of the draft environmental document. Once the LCP amendment request for certification of Subarea III and possible companion LCP amendments for Subarea V and Carmel Valley Neighborhoods 8A and 10 have been submitted to this office, it is possible that other issues may be identified. If, for any reason, permit authority is not delegated to the City of San Diego upon effective certification of the Subarea III plan, future coastal development permit applications for individual site development may also raise additional issues or concerns. Again, thank you for the opportunity to comment and please call me with any questions.

64. Comment noted.

Sincerely,



Ellen Lirley
Coastal Planner

cc: Lee Sherwood (via FAX)

(SUB3EIR\athena\doc)



STEVEN THUNBERG
DIRECTOR
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LOCATION CODE 550

County of San Diego

DEPARTMENT OF PUBLIC WORKS

5555 OVERLAND AVE, SAN DIEGO, CALIFORNIA 92123-1295

COUNTY ENGINEER
COUNTY AIRPORTS
COUNTY ROAD COMMISSIONER
TRANSIT SERVICES
COUNTY SURVEYOR
FLOOD CONTROL
WASTEWATER MANAGEMENT
SOLID WASTE

Response

May 14, 1998

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MAY 15 1998

ENVIRONMENTAL ANALYSIS
SECTION

Ms. Eileen Lower
Land Development Review Division
1222 First Avenue MS 501
San Diego CA 92101

Dear Ms. Lower:

DRAFT MASTER ENVIRONMENTAL IMPACT REPORT FOR PACIFIC HIGHLANDS RANCH (SUBAREA III) SUBAREA IN THE NORTH CITY FUTURE URBANIZING AREA (NCFUA).

Department of Public Works (DPW) has received the above referenced document dated April 30, 1998. We have reviewed the above mentioned document and have made the following comments.

The EIR and Traffic Study were prepared to document the potential impacts from the project on the Circulation Element Roads, local streets, and freeways in the mid-county region. The approval of this project will be the responsibility of the City Council, however, the project is located in the F.U.A. and thus requires a vote of the residents of the City of San Diego before the project can be taken to the council for their decision.

ENVIRONMENTAL IMPACT REPORT and TRAFFIC STUDY

65. **Project Description Section:** On page 52 of the report, both Carmel Valley Road and Del Mar Heights Road are described as (six-lane major streets), however, figures 3-18 and 3-19 show these roads as (four-lane major streets). Please review and clarify the apparent inconsistency with these descriptions.
66. **Traffic Circulation Section:** Table 4B-1 omits Rancho Diegueno Road from the table. Rancho Diegueno Road and Rancho Santa Fe Farms Road together form the route linking Carmel Valley Road with San Dieguito Road. The 24 hour volumes distributed to these

65. The correct road classification for Carmel Valley Road is a 4-lane Major and for Del Mar Heights Road is a 6-lane Primary Arterial.
66. Rancho Diegueno Road has been added to Table 1, Table 12, and Table 15 of the final traffic report. Also, the LOS "C" capacity for San Dieguito Road, Via de la Valle, and Via de Santa Fe has been revised from 7,500 to 7,100 ADT. In addition, the LOS capacities for El Apajo Road from San Dieguito Road to Via de Santa Fe has been revised to 9,500 ADT (LOS C) or 13,500 (LOS D) as appropriate. The final MEIR reflects these changes to the final traffic report.

Response

residential streets from the project is potentially significant and will need to be reported in this study. The table also incorrectly states the capacity of County two-lane collector roads, the capacity at L.O.S. AC@ is 7,100 ADT instead of 7,500. The three roads that will need to be changed are San Dieguito Road, Via de la Valle, and Via de Santa Fe. The capacity of El Apajo Road will be greater than the standard two-lane County Light Collector Road, because it is to be widened to three lanes. There will be one lane in each direction with a continuous left-turn lane between San Dieguito Road and Via de Santa Fe. The capacity at level of service AC@ is estimated by County engineering staff at 9,500 ADT and 13,500 at level of service AD@. Table 4B-4 also will need the same modifications made to it.

- 67 **Existing Conditions:** Table 6, Freeway Levels of Service lists the segment of I-5 between Via de la Valle and Lomas Santa Fe Drive as five-lanes and LOS AD@. This is incorrect, a field check shows the existing condition to be four lanes and LOS AF@. Please amend Table 6.
- 68 **Trip Generation:** Table 4B-8 has a typographical error in Subarea Plan I. The first entry for multi-family residential is 5001 dwelling units, a check of the traffic study shows 1,273 units for this use. These two sources need to be reconciled.
- 69 This table also uses an unusual trip rate for Office Uses. The SANDAG rate for this use is 20/KSF or 300/acre, the rate used in this work is 450/ac. There is some justification for raising the rate, if a large component of the total square feet office uses is medical. A medical office has a trip rate of 500/ac. However, even if 50% of the total office acreage was committed to medical uses the rate would increase to 400/ac not the 450 used in the study.

The concern over this rate is that, in the build out forecast, it overstates the probable onsite trip capture for this use by approximately 50% and in turn understates the number of off site trips distributed to the regional Circulation Element. The effect is that off site traffic impacts from the project may be also be understated. Some discussion and justification of the use of this rate needs to be included in this report.
- 70 **Cumulative Impacts:** This section needs to address the impacts of project traffic on the residential streets of Rancho Santa Fe Farms Road and Rancho Diegueno Road. The traffic volumes on these streets exceeds 1500 ADT which is the Planning Capacity of these streets. The addition on nearly 4,000 ADT to these streets is a significant impact to community character and possibly the road=s capacity. The study needs to establish the actual capacity of these streets using the Highway Capacity Manual procedures and to include the information in the report.
- 71 Table 4B-9 uses the City of San Diego standard for a two-lane Circulation Element Collector Road. The application of this standard to residential streets or County C.E.

67. Table 6 of the final traffic report has been revised to show four lanes on I-5 between Via de la Valle and Lomas Santa Fe Drive and an existing LOS "F." The final MEIR reflects these changes to the final traffic report.
68. The final MEIR has been revised to reflect this comment.
69. The City of San Diego has developed and requires the use of the City of San Diego trip generation rate summary. The current City rate for commercial office use is 450 trips/acre. Therefore, the traffic analysis used the approved City of San Diego rate.
70. Not all of Rancho Santa Fe Farms Road will remain as a rural light collector. Rancho Santa Fe Farms Road will be improved to two-lane collector standards from the northern project boundary to Carmel Valley Road as indicated in Table 24 (page 140). On-site streets such as portions of Rancho Santa Fe Farms Road will be improved to collector standards and separately identified in the final traffic report.

Regarding Rancho Diegueno Road and the northern section of Rancho Santa Fe Farms Road, these roadway segments currently have a posted speed limit of 40 mph. Also Rancho Diegueno Road and Rancho Santa Fe Farms Road provide a through connection for the Fairbanks Ranch community to Carmel Valley and State Route 56. In addition, the measured curb to curb is 40 feet. Therefore, based on the County of San Diego Public Road Standards, Rancho Diegueno Road and Rancho Santa Fe Farms Road are assumed to be rural light collectors.
71. See responses to comments 66 and 69 above.

Response

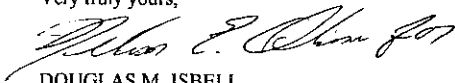
- roads is inconsistent with the practice of using the standard of the jurisdiction in which the impact occurs. The County standard for a residential street is 1500 ADT at L.O.S. AD@ and 7,100 ADT for two-lane Light Collector Roads. The capacity of residential streets may be greater than the 1,500 ADT standard. Absent specific segment analysis using the HCM determine the capacity and level of service, the additional 4,000 ADT is considered significant.
- 72 **Intersections:** The future turn volumes, posted in Appendix A, for the intersection of Camino Del Norte and Bernardo Center Drive confusing. When the peak hour turn volumes for existing conditions are compared to the build out condition turns, the peak hour west bound right turns are reduced by 30% in the AM and 50% in the PM. This is an error and will need to be corrected. In addition, the title of Appendix A is confusing. The title of Appendix A is "Existing Traffic Count Summaries", yet this table shows both existing turn counts, and counts labeled "Future". There is no reference to what future project or alternative these volumes represent. Please clarify the title of this table.
- 73 **Queuing:** The EIR has no substantive discussion or analysis addressing the queuing at the ramps on I-5 and I-15. What is the impact of this project's traffic on the existing queues at Via de la Valle with I-5, also Del Mar Heights Road and Carmel Valley Road with I-5? These interchanges currently experience significant delay on some turn moves. The traffic study does present queuing information in Table 18 and a paragraph of discussion on page 94. The queue delay times for the interchanges listed in Table 18 assume that the flow rates at metered ramps will be increased to whatever rate necessary to maintain a 15 minute delay time. This assumption is unsupported and in direct conflict with the policy by which Caltrans sets meter flow rates. The flow rate for any metered ramp is determined by the capacity of the mainline freeway lanes and the volume of traffic on the mainline during the peak hours. The capacity of the mainline is finite and assuming that flow rates can be adjusted based on demand at the ramps is inconsistent with known procedures. This analysis is not consistent with CEQA standards and will need to be repeated using a methodology that is consistent with the known standards and policies.
- 74 **Freeways:** The EIR report contains no analysis of the direct project or cumulative impacts on I-5, I-15 or SR-56. The Circulation Section of the EIR will need to analyze and discuss the impact of project traffic on existing conditions and cumulative conditions.
- 75 The project distributes 24,700 ADT to SR-56 between Carmel Country Road and I-5. This is 35% of the total project traffic and 25% of the total forecast traffic on this segment. One project using this much of the total Planned Capacity (110,000 ADT @ L.O.S. AD@) is questionable in terms of prudent land use planning. SR-56 is a regional facility, when 23%, 24,700 ADT, of the planned capacity is allocated to one project, a significant impact on the regional freeway capacity is created.
72. Appendix A will be revised to remove the future volumes resulting in only the existing volumes being shown. Regarding the intersection of Camino del Norte and Bernardo Center Drive, the future volumes will change when new land uses and new facilities are added to an existing street system. A redistribution of traffic occurred in this area due to additional facilities and new land development projects such as 4S Ranch and Black Mountain Ranch.
73. The queuing analysis is included in Table 18 and page 94 of the traffic report which is Appendix B of the MEIR. The queuing analysis is based on City requirements and incorporates appropriate design features. First, queuing for future cumulative volumes is determined based on the assumption that existing ramp meter rates are not changed in the future. Second, where queue lengths were excessive or do not exist presently, a 15-minute maximum queue was assumed. This provides an estimate of the possible future queues. The information in the traffic report will be incorporated into the final EIR. The procedure that Caltrans uses is based on a case-by-case approach as ramp meter systems are implemented in the various freeway corridors. When the full freeway operations and management system is implemented, flow rates at individual meters will be adjusted on a "real time" basis (i.e., the system is a dynamic always changing system with data feedback to the operations center where computer software interprets the real-time field data and the entire system is adjusted to maximize throughput of the overall freeway system). Consequently, metering flow rates are typically not provided by Caltrans for EIR impact analysis purposes. If the county has standards, policies, and procedures for determining ramp meter queues to be consistent with CEQA standards they should be provided so that it can be determined whether a revised analysis is needed. The Caltrans comment letter above did not offer any new procedures to be used for queuing analysis.
74. The Draft MEIR includes a traffic report analysis of project impacts on I-5, I-15, and SR-56. Cumulative impacts to I-5 and I-15 are summarized in the traffic report and in Chapter 4B of the final MEIR as well.
75. It is not unusual for a project to use a significant portion of freeway capacity on a freeway segment adjacent to the interchange that primarily serves that project. The freeway system is sized to accommodate not only adjacent projects but through traffic from other projects in the general area. No jurisdiction to our knowledge has a policy for guiding land use decisions that takes into account how much traffic is put on a particular facility, particularly, a freeway. Subarea III is designed to maximize external traffic on freeway facilities rather than arterial streets and roads for safety reasons. Community impacts would be created if traffic loading to freeways was restricted by an agency's land use planning policy to do so. The state General Plan requires a balance between the land use and circulation elements of an agency's General Plan but we are not aware of any agency's land use policy that would reduce or limit external traffic to freeways from a project and deliberately increase traffic on arterial roads and streets through communities. In addition, the project will contribute to the widening of SR 56 to six lanes.

Response

- 76 The project will also add over 4000 ADT to I-5 north of Via de la Valle, the existing condition on this segment is AFe. The traffic study assumes that I-5 is between the project and SR-78 is 10 lanes with 2 HOV lanes and uses the capacity in the analysis of cumulative impacts at build out of this project. The Regional Transportation Plan (RTP) does not schedule the addition of new mainline lanes until sometime between 2011 and 2020. The HOV lanes between Del Mar Heights Road and Birmingham Drive are scheduled for construction between 2004 and 2010. The HOV capacity could be used in the analysis of cumulative impacts, but the ten-lane capacity will not be available until long after this projects traffic is impacting this freeway. The analysis will need to be repeated using the appropriate capacities on I-5.
- 77 **Mitigation:** The mitigation section is incomplete. It does not address the manner by which the project participates in mitigating cumulative freeway and interchange queuing impacts. The freeway impacts are an example of this omission. The EIR lists future planned but unfunded improvements to I-5 and I-15, then states that these improvements are Aoutside scope of project@, or that the future improvements are to be made by Aothers@. There is no definition of who the Aothers@ are. This strategy is not acceptable as mitigation of either direct or cumulative impacts and will require modification to meet the standard of CEQA. The CEQA standard is; that the planned capacity on I-5 used in the analysis of cumulative impacts is currently funded or planned to be constructed in the same time frame that the project=s traffic will impact I-5 and the interchanges north of the project.

If you have any questions, please call Steve Denny at (M.S. S50) 694-3727.

Very truly yours,



DOUGLAS M. ISBELL
Deputy Director

DMI:SD:KPF

76. Table 11, Table 14, and Table 17 in the traffic report have been revised to show four lanes on I-5 (8-lane freeway) north of Via de la Valle.
77. Table 24 of the traffic report and the tables in the MEIR address both on- and off-site mitigation for both streets and freeways. The project is also phased with development caps until freeway ramp improvements are operational. For example, the phasing plan has a limit of only 1900 dwelling units that can be built until I-5/SR-56 ramps to and from the north are operational. Also, the funding for PR/ED preparation is guaranteed by Pardee if state or federal funds are not available in a timely manner. Fair-share funding for State Route 56 widening or ramp construction is also included in the Public Facilities Financing Plan for Subarea III.

Response



COUNTY OF SAN DIEGO
DEPARTMENT OF PUBLIC WORKS
INTRADEPARTMENTAL CORRESPONDENCE

Department of Public Works

May 13, 1988

TO: Kaylene Fleming, Environmental Management Specialist I
Environmental Services (0385)

FROM: John L. Snyder, Deputy Director
Land Development Division (0336)

SUB-AREA III (F.U.A.) CITY OF SAN DIEGO, EIR AND TRAFFIC STUDY REVIEW

I have reviewed the environmental documents submitted in support of this proposed project. The EIR and Traffic Study were prepared to document the potential impacts from the project on the Circulation Element Roads, local streets, and freeways in the mid-county region. The approval of this project will be the responsibility of the City Council, however, the project is located in the F.U.A. and thus requires a vote of the residents of the City of San Diego before the project can be taken to the council for their decision.

78 **ENVIRONMENTAL IMPACT REPORT and TRAFFIC STUDY**

Project Description Section: On page 52 of the report, both Carmel Valley Road and Del Mar Heights Road are described as (six-lane major streets), however, figures 3-18 and 3-19 show these roads as (four-lane major streets). Please review and clarify the apparent inconsistency with these descriptions.

Traffic Circulation Section: Table 4B-1 omits Rancho Diegueno Road from the table. Rancho Diegueno Road and Rancho Santa Fe Farms Road together form the route linking Carmel Valley Road with San Dieguito Road. The 24 hour volumes distributed to these residential streets from the project is potentially significant and will need to be reported in this study. The table also incorrectly states the capacity of County two-lane collector roads, the capacity at L.O.S. "C" is 7,100 ADT instead of 7,500. The three roads that will need to be changed are San Dieguito Road, Via de la Valle, and Via de Santa Fe. The capacity of El Apajo Road will greater than the standard two lane

78. See responses to the County of San Diego Letter from Doug Isbell above (comments 65-77).

Response

Kaylene Fleming

2

May 13, 1988

County Light Collector Road, because it is to be widened to three lanes. There will be one lane in each direction with a continuous left-turn lane between San Dieguito Road and Via de Santa Fe. The capacity at level of service "C" is estimated by County engineering staff at 8,500 ADT and 13,500 at level of service "D". Table 4B-4 also will need the same modifications made to it.

Existing Conditions: Table 6, Freeway Levels of Service lists the segment of I-5 between Via de la Valle and Lomas Santa Fe Drive as five-lanes and LOS "D". This is incorrect, a field check shows the existing condition to be four lanes and LOS "F". Please amend Table 6.

Trip Generation: Table 4B-8 has a typographical error in Subarea Plan I. The first entry for multi-family residential is 5001 dwelling units, a check of the traffic study shows 1,273 units for this use. These two sources need to be reconciled.

This table also uses an unusual trip rate for Office Uses. The SANDAG rate for this use is 20/KSF or 300/acre, the rate used in this work is 450/ac. There is some justification for raising the rate, if a large component of the total square feet office uses is medical. A medical office has a trip rate of 500/ac. However, even if 50% of the total office acreage was committed to medical uses the rate would increase to 400/ac not the 450 used in the study.

The concern over this rate is that, in the build out forecast, it overstates the probable onsite trip capture for this use by approximately 50% and in turn understates the number of off site trips distributed to the regional Circulation Element. The effect is that off site traffic impacts from the project may be also be understated. Some discussion and justification of the use of this rate needs to be included in this report.

Cumulative Impacts: This section needs to address the impacts of project traffic on the residential streets of Rancho Santa Fe Farms Road and Rancho Diegueno Road. The traffic volumes on these streets exceeds 1500 ADT which is the Planning Capacity of these streets. The addition on nearly 4,000 ADT to these streets is a significant impact to community character and possibly the road's capacity. The study needs to establish the actual capacity of these streets using the Highway Capacity Manual procedures and to include the information in the report.

Table 4B-9 uses the City of San Diego standard for a two-lane Circulation Element Collector Road. The application of this standard to residential streets or County C.E. roads is inconsistent with the practice of using the standard of the jurisdiction in which the impact occurs. The County standard for a residential street is 1500 ADT at L.O.S. "C" and 7,100 ADT for two-lane Light Collector Roads. The capacity of residential streets may be greater than the 1,500 ADT standard. Absent specific segment analysis

Response

Kaylene Fleming

3

May 13, 1998

using the HCM determine the capacity and level of service, the additional 4,000 ADT is considered significant.

Intersections: The future turn volumes, posted in Appendix A, for the intersection of Camino Del Norte and Bernardo Center Drive are confusing. When the peak hour turn volumes for existing conditions are compared to the build out condition turns, the peak hour west bound right turns are reduced by 30% in the AM and 50% in the PM. This is an error and will need to be corrected. In addition, the title of Appendix A is confusing. The title of Appendix A is "Existing Traffic Count Summaries", yet this table shows both existing turn counts, and counts labeled "Future". There is no reference to what future project or alternative these volumes represent. Please clarify the title of this table.

Queuing: The EIR has no substantive discussion or analysis addressing the queuing at the ramps on I-5 and I-15. What is the impact of this project's traffic on the existing queues at Via de la Valle with I-5, also Del Mar Heights Road and Carmel Valley Road with I-5? These interchanges currently experience significant delay on some turn moves. The traffic study does present queuing information in Table 18 and a paragraph of discussion on page 84. The queue delay times for the interchanges listed in Table 18 assume that the flow rates at metered ramps will be increased to whatever rate necessary to maintain a 15 minute delay time. This assumption is unsupported and in direct conflict with the policy by which Caltrans sets meter flow rates. The flow rate for any metered ramp is determined by the capacity of the mainline freeway lanes and the volume of traffic on the mainline during the peak hours. The capacity of the mainline is finite and assuming that flow rates can be adjusted based on demand at the ramps is inconsistent know procedures. This analysis is not consistent with CEQA standards and will need to be repeated using a methodology that is consistent with the known standards and policies.

Freeways: The EIR report contains no analysis of the direct project or cumulative impacts on I-5, I-15 or SR-56. The Circulation Section of the EIR will need to analyze and discuss the impact of project traffic on existing conditions and cumulative conditions.

The project distributes 24,700 ADT to SR-56 between Carmel Country Road and I-5. This is 35% of the total project traffic and 25% of the total forecast traffic on this segment. One project using this much of the total Planned Capacity (110,000 ADT @ L.O.S. "D") is questionable in terms of prudent land use planning. SR-56 is a regional facility, when 23%, 24,700 ADT, of the planned capacity is allocated to one project, a significant impact on the regional freeway capacity is created.

The project will also add over 4000 ADT to I-5 north of Via de la Valle, the existing condition on this segment is "F". The traffic study assumes that I-5 is between the

Response

Kaylene Fleming

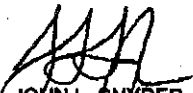
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May 13, 1998

project and SR-78 is 10 lanes with 2 HOV lanes and uses the capacity in the analysis of cumulative impacts at build out of this project. The Regional Transportation Plan (RTP) does not schedule the addition of new mainline lanes until sometime between 2011 and 2020. The HOV lanes between Del Mar Heights Road and Birmingham Drive are scheduled for construction between 2004 and 2010. The HOV capacity could be used in the analysis of cumulative impacts, but the ten-lane capacity will not be available until long after this project's traffic is impacting this freeway. The analysis will need to be repeated using the appropriate capacities on I-5.

Mitigation: The mitigation section is incomplete. It does not address the manner by which the project participates in mitigating cumulative freeway and interchange queuing impacts. The freeway impacts are an example of this omission. The EIR lists future planned but unfunded improvements to I-5 and I-15, then states that these improvements are "outside scope of project", or that the future improvements are to be made by "others". There is no definition of who the "others" are. This strategy is not acceptable as mitigation of either direct or cumulative impacts and will require modification to meet the standard of CEQA. The CEQA standard is; that the planned capacity on I-5 used in the analysis of cumulative impacts is currently funded or planned to be constructed in the same time frame that the project's traffic will impact I-5 and the interchanges north of the project.

If you have any questions, please call Steve Denny at (S.C. S50) 694-3727.



JOHN L. SNYDER, Deputy Director
Department of Public Works

JLS:SD:jb

cc: Trish Boaz, District 3 (A500); Bob Christopher, DPW (0336); Robert Hoglen, DPW (0336); Susan Porter, DPLU (0650); LeAnn Carmichael, DPLU (0650); Eric Gibson, DPLU (0650)

C:\WLTR\SUBAREA III

BOWIE, ARNESON, WILES & GIANNONE

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May 18, 1998

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RESPOND TO NEWPORT BEACH
REF. OUR FILE

4014.25

*A PROFESSIONAL CORPORATION

Via Facsimile/Overnight Delivery

City of San Diego
Development Services
Land Development Review Division
1222 First Avenue, Mail Station 501
San Diego, CA 92101

RECEIVED

MAY 19 1998

LAND DEVELOPMENT REVIEW DIVISION

Attn: Eileen Lower, Environmental Planner

Re: Draft Master Environmental Impact Report for the Pacific Highlands Ranch
(Subarea III) Subarea Plan in the North City Future Urbanizing Area ("NCFUA");
General Plan Amendment; NCFUA Framework Plan Amendment; Subarea Plan;
Master Rezone; Multiple Habitat Planning Area Boundary Adjustment; and Local
Coastal Plan Amendment ("Land Use Proposal")

Dear Ms. Lower:

On behalf of the Del Mar Union School District ("District"), we have reviewed the Draft Master Environmental Impact Report ("Draft MEIR") for the Pacific Highlands Ranch ("Subarea III") Subarea Plan ("Subarea Plan"). While the alignment of State Route 56 ("SR-56") must be decided before the environmental impact of the Land Use Proposal can be evaluated and resulting impacts identified and responded to, the District submits the following initial comments for consideration by the City of San Diego ("City"). The Land Use Proposal submitted to the City for development within Subarea III includes the: General Plan Amendment ("GPA"), NCFUA Framework Plan Amendment, adoption of the Subarea Plan, master rezoning, a North City Local Coastal Plan Amendment, Multiple Habitat Planning Area Boundary Adjustment, Development Agreement, Multiple Species Conservation Program Amendment and conferring Third Party Beneficiary Status. The purpose of these comments is to identify the significant adverse impacts of the Land Use Proposal on the District's school facilities ("School Facilities"), as well as to propose conditions of approval ("Conditions") and mitigation measures ("Mitigation Measures") to reduce such impacts to a level of insignificance. The Conditions and Mitigation

Response

BOWIE, ARNESON, WILES & GIANNONE

City of San Diego
May 18, 1998
Page 2

Measures need to be included in the Land Use Proposal prior to any approval by the Planning Commission ("Planning Commission") of the City.

- 79 Specifically, the District proposes that the major real property owner ("Owner") within the Subarea Plan area, which we understand to be Pardee Construction Company, enter into a mitigation agreement ("Mitigation Agreement") with the District prior to any consideration by the Planning Commission of the Land Use Proposal. Additionally, we propose that the Conditions and Mitigation Measures require that the remaining owners ("SP III Owners") enter into a similar Mitigation Agreement with the District prior to City approval of any legislative, discretionary residential development approval, or issuance of a building permit within Subarea III, similar to the Conditions and Mitigation Measures applicable to Subarea V. The Mitigation Agreement with Owner should be included in the appendices to the Subarea Plan and the MEIR. Such Mitigation Agreement shall fully mitigate the significant impacts to be incurred by the District as set forth below. The Draft MEIR Mitigation Measure must also be revised to reflect the mitigation payment amounts that shall be paid to the District to fully mitigate the Land Use
- 80 Proposal's impacts on the District's School Facilities. We also respectfully request that the City extend the Draft MEIR comment period until a reasonable time after the alignment of SR-56 has been decided. This is necessary in order for the District to thoroughly evaluate the actual impacts to be incurred by the District. As it stands now, there is no specific factual setting for the general public to evaluate the Land Use Proposal, whatever in fact it is.
- 81

A. IMPACTS FROM THE LAND USE PROPOSAL

1. School Facility Impacts

- (a) The Land Use Proposal will Result in Significant Environmental Impacts on School Facilities of the District

- 82 The Draft MEIR analyzes two (2) separate land use plans developed around the two (2) proposed northern alignments for the middle segment of SR-56, which are Subarea Plan 1 ("Subarea Plan 1") and Subarea Plan 2 ("Subarea Plan 2"). We believe this is not permissible and that these proceedings must be deferred until the alignment of SR-56 is determined subject to the foregoing. However, we wish to advise the City that on the basis of Subarea Plan 1 incorporating the proposed SR-56 Alignment "F" and Subarea Plan 2 incorporating the proposed SR-56 Alignment "D", the following are identified as the significant adverse impacts on the District. Each Subarea Plan contains two (2) scenarios. As proposed, the first scenario for Subarea Plan 1 on the basis of SR-56 Alignment "F" proposes the development of 4,974 residential dwelling units ("DUs"), a Town Center with commercial park, park, open space, residential and civic area components; elementary, junior high, and high schools, a police

Response

79. The NCFUA Framework Plan does not require a mitigation agreement prior to Planning Commission consideration of the project. The development of the proposed on-site elementary, junior high, and high schools would accomplish mitigation of the project's direct impact to schools from the subarea plan. School facilities financing and mitigation agreements between the affected school districts and the project applicant would be required at the time the Subarea Plan is approved by the City Council to ensure that the impacts on school facilities are mitigated to a level less than significant. In addition, prior to granting a ministerial or discretionary entitlement for a parcel, such parcel shall be subject to the terms of a mitigation agreement entered into by the landowner and the applicable School Districts or included in a community facilities district established by the applicable School Districts and authorized to fund the acquisition of school sites and construction of schools.
80. The NCFUA Framework Plan and CEQA do not require that a mitigation agreement be included in the Subarea Plan or final EIR. Any School District or property owner may submit an executed mitigation agreement to be included in the record of the Subarea Plan proceedings at its election.
81. The MEIR analyzes the environmental effects of the proposed subarea plans utilizing two of the proposed SR-56 alternative alignments. Additionally, the Alternatives section of the document addresses the SR-56 Central Alignment. The San Diego City Council is scheduled to review and consider the SR-56 EIR on June 30, 1998. It should be noted that while the MEIR for the proposed project can be certified prior to the selection of the SR-56 alignment, the Subarea Plan cannot be implemented until the SR-56 alignment is chosen and unless a phase shift is approved by the voters. It is not possible to extend the public review and comment period for the Pacific Highlands Ranch (Subarea III) Subarea Plan MEIR, as doing so would eliminate the possibility of placing the Subarea III Plan phase shift proposal on the November 1998 ballot.
82. See response 81 above. The remainder of this comment addressing the significance of school impacts is acknowledged.

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substation; and associated public facilities and transportation network on approximately 2,652 acres ("Scenario No. 1"). The second scenario has the potential to increase the maximum number of DUs within Subarea Plan 1 to 5,456 DUs should the private high school site, junior high school, and one of the elementary school sites be redesignated for residential uses ("Scenario No. 2"). As for Subarea Plan 2, the Plan is for 4,973 new residential DUs ("Scenario No. 3"), to a maximum of 5,414 DUs should the private high school site, junior high school, and one of the elementary school sites be redesignated for residential uses ("Scenario No. 4"). Additionally, according to the Draft MEIR Project Alternatives - SR-56 Central Alignment Alternative, the maximum number of residential DUs that may be built in Subarea III is 5,500 ("Scenario 5"). Scenario Nos. 3 and 4, as well as the other alternatives, are not discussed herein because the number of DUs that may be built under Scenario Nos. 1, 2 and 5 are greater.

According to the Draft MEIR, using Scenario No. 1, the Land Use Proposal will result in approximately 1,733 new multi-family attached ("MFA") DUs and 3,241 new single-family detached ("SFD") DUs for a total of 4,974 DUs. [Draft MEIR, page 351.] The student generation rates ("SGR") for the school districts, as stated in the Draft MEIR¹, that would serve Subarea III under Scenario No. 1 would result in 1,291 grade K through 6 students ("Project Students") [(1,733 MFA DUs x .472 MFA SGR = 818 Project Students) + (3,241 SFD DUs x .146 SFD SGR = 474 Project Students) = 1,291 Total Project Students]. This number is incorrect because the wrong SGRs were used.

83. As to the District, the number of elementary students generated is based upon a SGR of .472 for each SFD DU and .146 for each MFA DU. Therefore the correct number of grade K through 6 Project Students generated under Scenario No. 1, using the District's SGR, will be 1,783 [(1,733 MFA DUs x .146 MFA SGR = 253 Project Students) + (3,241 SFD DUs x .472 SFD SGR = 1,530 Project Students) = 1,783 total Project Students].

The Draft MEIR, using Scenario No. 2, states that the largest number of DUs that may be built in Subarea III is 5,456. Under this scenario, the Land Use Proposal will result in approximately 2,783 new SFD DUs and 2,673 new MFA DUs.² The number of grade K through 6 Project Students generated under this scenario will be 1,704 [(2,673 MFA DUs x .146 MFA SGR = 390 Project Students) + (2,783 SFD DUs x .472 SFD SGR = 1,314 Project Students) = 1,704 Total Project Students].

¹ Table 4L-1 of the Draft MEIR on page 344 states that the SGR for MFA DUs is .472 and the SGR for SFD DUs is .146. The reverse is true.

² The District has assumed that 51% of the housing product types are SFD DUs and 49% are MFA DUs for all of the scenarios discussed herein.

83. The Final MEIR has been revised to show the correct student generation rates and the associated student generation for the Del Mar School District and the Solana Beach School District. Under proposed Subarea Plan 1, a total of 877 elementary school students would be generated for the Del Mar School District and 815 elementary school students would be generated for the Solana Beach School District. Under Subarea Plan 2, a total of 1,169 elementary school students would be generated for the Del Mar School District and 564 elementary students would be generated for the Solana Beach School District.

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Response

84 Of the 4,974 DUs in Scenario No. 1, approximately 3,034 DUs (1,547 SFD DUs and 1,487 MFA DUs) would be within the boundaries of the District, with the remaining 1,940 DUs located within the boundaries of the Solana Beach Elementary School District³. Of the 5,456 DUs in Scenario No. 2, approximately 3,328 DUs [1,697 SFD DUs and 1,631 MFA DUs] would be within the District's boundaries, with the remaining 2,128 DUs within the boundaries of the Solana Beach Elementary School District. If the maximum number of DUs that may be built is 5,500 under Scenario 5, approximately 3,386 DUs [1,727 SFD DUs and 1,659 MFA DUs] would be within the boundaries of the District and the remaining 2,114 DUs would be within the boundaries of the Solana Beach Elementary School District.

85 The District estimates the impact on the School Facilities of the District caused by new development to be \$11,206 per SFD DU and \$3,514 per MFA DU⁴.

86 The total Land Use Proposal impact on the District's School Facilities is as follows:

\$22,561,000 [(1,547 SFD DUs x \$11,206 = \$17,335,682) + 1,487
MFA DUs x \$3,514 = \$5,225,318 = \$22,561,000] - Scenario No. 1

\$24,747,916 [(1,697 SFD DUs x \$11,206 = \$19,016,582) + (1,631 MFA DUs
x \$3,514 = \$5,731,334) = \$24,747,916] - Scenario No. 2

\$25,182,488 [(1,727 SFD DUs x \$11,206 = \$19,352,762) + (1,659 MFA DUs
x \$3,514 = \$5,829,726) = \$25,182,488] - Scenario No. 5

(b) Inadequacy of Statutory School Fees to Fund New School Facilities

The District currently is authorized to levy School Facilities fees ("Statutory School Fees") pursuant to Education Code Section 17620 *et seq.* and Government Code Section 65995 *et seq.* in the amount of \$0.8951 per square foot of new residential development.⁵ Based on an

³ The District has assumed that 61% of new residential development will be in the District's boundaries and 39% will be in Solana Beach Elementary School District's boundaries for all scenarios discussed herein.

⁴ The SFD and MFA School Facility cost impacts do not include interim School Facility or transportation impacts.

⁵ The remaining \$1.035 of Statutory School Fees are allocated to the San Dieguito
(continued...)

84. The Final MEIR has been revised to show the number of dwelling units within the boundaries for the Del Mar and Solana Beach school districts.

85. The mitigation agreement(s) and community facilities district(s) shall establish funding to be provided for school facilities.

86. Comment noted.

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Response

assumed average of 2,500 square feet per SFD DU and 1,010 square feet per MFA DU, the District would collect an average of \$2,238 per SFD DU and \$904 per MFA DU within Subarea III, for a total of:

$\$4,806,434 [(1,547 \text{ SFD DUs} \times \$2,238 = \$3,462,186)] + (1,487 \text{ MFA DUs} \times \$904 = \$1,344,248) = \$4,806,434$ - Scenario No. 1

$\$5,272,310 [(1,697 \text{ SFD DUs} \times \$2,238 = \$3,797,886) + (1,631 \text{ MFA DUs} \times \$904 = \$1,474,424)] = \$5,272,310$ - Scenario No. 2

$\$5,364,762 [(1,727 \text{ SFD DUs} \times \$2,238 = \$3,865,026) + (1,659 \text{ MFA DUs} \times \$904 = \$1,499,736)] = \$5,364,762$ - Scenario No. 5

87 Statutory School Fees, under any of these scenarios, will not provide the District with the funds required to adequately house the students and mitigate the school facility impacts which will be generated from the Land Use Proposal, resulting in unfunded School Facilities needs of an estimated:

$\$17,754,566 [\$22,561,000 - \$4,806,434]$ - Scenario No. 1

$\$19,475,606 [\$24,747,916 - \$5,272,310]$ - Scenario No. 2

$\$19,817,726 [\$25,182,488 - \$5,364,762]$ - Scenario No. 5

Unfunded School Facilities are not merely a socioeconomic impact but a physical, substantial adverse environmental impact under CEQA. The District has a statutory mandate to educate the students within its jurisdiction. If the District is required to educate students without an assured source of funds and without available capacity, at a minimum the policies underlying the enactment of CEQA are undermined, including the policy to consider critical thresholds for the health and safety of the people of California [Public Resources Code Section 21000(d)]. Expressions of legislative policy should be considered in acting upon general plans and amendments thereto. [*Schaeffer Land Trust v. San Jose City Council* (1989) 215 Caliope.3d 612, 263 Cal.Rptr. 813.] An educational environment which houses students in excess of the

87. See response 85 above.

⁵(...continued)

Union High School District pursuant to Education Code Section 17623. Accordingly, the two school districts collect Statutory School Fees in the amount of \$1.93 per square foot of new development.

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Response

88 available capacity of the public schools which must educate such students creates critical adverse health and safety considerations. To ignore the express policy mandates of CEQA in this regard in order to not "burden" developers of property (whose projects create the impacts to be mitigated in the first place) is contrary to the law. If new housing is to be approved without school capacity as necessitated by such development, the quality of the entire existing community is degraded.

88. See response 79 above.

89 As correctly pointed out in the Draft MEIR, the District is operating above capacity. [Draft MEIR, pages 343, 344 and 354.] It should be noted, however, that the Draft MEIR's statement of student capacity is overstated because the total capacity figures contained therein include the use of interim portable classrooms to house students on a temporary basis. The District's educational policies discourage the use of portable classrooms to house students and are not counted as part of the District's permanent capacity. Accordingly, the overcrowding of District schools as stated in the Draft MEIR is further exacerbated. The current figures are as follows⁶:

89. Capacity figures are based upon available classrooms of the School District and reflect the current School District's policy to not adopt year-round enrollment in any of its schools, which could increase available capacity of each school by approximately 20 percent.

<i>Item</i>	<i>1997-98 Capacity⁷</i>	<i>1997-98 Enrollment⁸</i>	<i>Excess Capacity (Shortfall)</i>
<i>District Elementary Schools</i>	1,354	1,858	(504)

(b) The City Must Mitigate School Facilities Impacts

90 Prior to any approval by the City of the Land Use Proposal, the City must require mitigation of School Facilities impacts as to the District.

90. See response 79 above.

⁶ See Table 1 on Page 6 of the District's Study.

⁷ These figures do not include the Shores or Carmel Valley Neighborhood 4 Elementary School.

⁸ The source for this figure is the District's Fall 1997-98 CBEDS enrollment.

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Response

While the California Legislature in 1986 enacted Assembly Bill 2926, Chapter 887 of the Statutes of 1986 (Government Code Sections 53080⁹ *et seq.*, and 65995 *et seq.*) ("Statutory School Fee Legislation"), the Statutory School Fee Legislation included a cap on the amount of Statutory School Fees, presently in the amount of \$1.93 per square foot of new residential development as noted above. Subsequent to the enactment of the Statutory School Fee Legislation, a trio of cases held that the Statutory School Fee Legislation did not apply to land use decisions involving legislative decisions by a local agency such as the City. [*Mira Development Corp. v. City of San Diego* (1988) 205 Calloper.3d 1201, 252 Cal.Rptr. 825; *William S. Hart Union High School District v. Regional Planning Commission* (1991) 226 Calloper.3d 1612, 277 Cal.Rptr. 645; and *Murrieta Valley Unified School District v. County of Riverside* (1991) 228 Calloper.3d 1212, 279 Cal.Rptr. 421.]

91 The *Mira*, *Hart*, and *Murrieta* decisions all hold that the limitations set forth in the Statutory School Fee Legislation are not applicable to land use decisions involving legislative approvals such as a specific plan, zone change, development agreement and general plan amendment as are requested of the City by the Land Use Proposal. Accordingly, since the Land Use Proposal involves an application for legislative approvals, the Statutory School Fee Legislation does not preempt or prohibit the City from requiring Mitigation Measures to fully mitigate School Facility impacts.¹⁰

92 Additionally, the NCFUA Framework Plan clearly indicates and recognizes that Statutory School Fees are insufficient to fully fund the costs of new schools. Consequently, the Framework Plan requires developers to fund school construction. [NCFUA Framework Plan, at §8.3c, p. 106]. Further, the failure to adequately fund School Facilities violates CEQA, as well as the City's General Plan and policies of the City Council relating to schools, which is discussed in detail below.

91. See response 79 above.

92. See responses 79 and 80 above.

⁹ Effective, January 1, 1998, this statute became Education Code Section 17620.

¹⁰ With regard to a CFD pursuant to the Mello-Roos Act of 1982, the California Supreme Court has stated that Government Code Section 65995 expressly excludes special taxes levied pursuant to the Mello-Roos Community Facilities Act of 1992 from the dollar limitations set forth in the Statutory School Fee Legislation. [*Grupe Development v. Superior Court* (1993) 4 Cal.4th 911, 921, 16 Cal.Rptr.2d 226, 232.] Accordingly, there are no legal limitations prohibiting the City from utilizing a Mello-Roos District as a mitigation measure.

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(c) Public Services/Facilities

- 93 In addition to the above corrections to the Draft MEIR relative to the SGRs and number of Project Students generated, please note the following information should also be corrected. On Page 343, Page 2, Line 3 in the Draft MEIR, it states that both Del Mar Heights Elementary School and Del Mar Hills Elementary School are located within the City of Del Mar. Both these schools are located within the City.

- 94 The Draft MEIR sites three (3) elementary schools in Subarea Plans 1 and 2. The elementary school site located between Carmel Valley Road and SR-56 within Subarea Plan 2 is unacceptable to both the District and State Department of Education. As to the other school sites, the District requires additional information prior to approval of the selection and reservation of the sites by the District's Board of Trustees and the State Department of Education. In order for the District and the State Department of Education to approve the selection and reservation of such sites, the alignment of SR-56 must first be resolved. The location of SR-56 within Subarea III, traffic circulation and street improvement plans raise significant safety issues, in addition to the human health and safety issues discussed below. Therefore, the District requests that prior to adoption of the Land Use Proposal, school sites acceptable to the District and State Department of Education shall be selected, reserved and the school site purchase agreements ("Purchase Agreements") be executed to the satisfaction of the District. The District further requests that the City involve the District in the land use planning process for the areas adjacent to the school sites so as to ensure compatible uses next to the school sites.

(d) Proposed School Mitigation Measure

Pursuant to CEQA, significant impacts must be mitigated to a level of insignificance prior to approval of a project by the City. As discussed above, the Land Use Proposal will have a significant environmental impact upon School Facilities. The Draft MEIR proposes the following mitigation, monitoring and reporting requirement with respect to mitigating School Facilities impacts as a result of the Land Use Proposal:

"The development of the proposed on-site elementary, junior high, and high schools would accomplish mitigation of the project's direct impact to the schools from the subarea plan. Agreements between the affected school districts and project applicants at the time tentative maps are processed would be required to ensure that the impacts on the educational services are mitigated to a level less than significant." [Draft MEIR, page 355]

Response

93. The Final MEIR has been revised to show that Del Mar Heights and Del Mar Hills elementary schools are located in the city of San Diego.
94. Comment noted. The Subarea Plan identifies school site locations with respect to each proposed SR-56 alignment. The traffic analysis prepared for the Subarea Plan addressed trip generation from all of the school sites and evaluated on-site intersection operations. See also response 79 above.

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Response

95 The above measure, while purporting to mandate the full mitigation of School Facilities costs through the development of on-site schools and agreements between the affected school district and the Land Use Proposal applicants, does not specify what the mitigation payment amounts shall be. Nor does the Draft MEIR Mitigation Measure address that Purchase Agreements shall be negotiated to the satisfaction of the District prior to or concurrent with the adoption of the Subarea Plan as is required by the Subarea Plan. [Subarea Plan, page 67.] Additionally, the Draft MEIR Mitigation Measure and Subarea Plan school mitigation condition are inconsistent relative to the timing of when the Owner, SP III Owners and District shall execute a Mitigation Agreement. [Subarea Plan, page 67.] Accordingly, the above Mitigation Measure is inadequate as it is indefinite and uncertain and may not mitigate School Facilities impacts to below a level of significance. Below is the suggested Mitigation Measure language that should be incorporated into the MEIR and Subarea Plan as it relates to this District:

96 "Prior to City of San Diego ("City") Planning Commission approval of any legislative or discretionary residential development application relative to the Pacific Highlands Ranch (Subarea III) Subarea Plan ("Subarea Plan") within the Del Mar Union School District's ("District") portion of the City, the City shall require the major landowner, Pardee ("Pardee" or "Owner"), to execute a School Facilities Funding and Mitigation Agreement ("Mitigation Agreement") substantially in the same form is attached hereto in the Technical Appendices to this Master Environmental Impact Report ("MEIR"). All other landowners ("Owners") shall execute a Mitigation Agreement with the District prior to City Council approval of any legislative, or discretionary residential development approval or issuance of a building permit within the Subarea Plan by the City Council. Pardee and Owners shall agree to pay specified mitigation payments in the amounts of eleven thousand, two hundred and six dollars (\$11,206) per single detached dwelling unit and three thousand, five hundred fourteen dollars (\$3,514) per multi-family attached dwelling unit. These amounts shall be adjusted each January 1, beginning January 1, 1999, by the change in the Marshall-Swift Class "D" Wood Frame Index since the preceding January 1.

Pardee and the other Owners of development projects, which contain land designated as a school site in the Subarea Plan, and as agreed to by the District and State Department of Education, excluding development projects approved prior to adoption of this

95. See responses 79 and 80 above.

96. See responses 79 and 80 above.

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subarea plan by the City Council, are required to enter into school site purchase agreements ("Purchase Agreements") with the District. The Purchase Agreements shall be negotiated to satisfaction of the District prior to or concurrent with adoption of the Subarea Plan. The Subarea Plan shall not be effective until Purchase Agreements are fully executed by the affected parties. These Purchase Agreements shall commit Owners of designated school sites to sell those sites to the District and commit the District to buy those sites. The terms of the Purchase Agreements shall be negotiated between the relevant Owner and the District."

The District further suggests that the Mitigation Agreement entered between the District and Owner (Pardee) be included in the Technical Appendices to the MEIR and the Subarea Plan.

97 If, however, the Mitigation Measure stands as currently proposed by the Draft MEIR, it is subject to attack under CEQA. Courts have held that public agencies should not rely upon Mitigation Measures of unknown effectiveness in concluding that such mitigation measure could mitigate impacts to an insignificant level. [*Kings County Farm Bureau v. Hanford* (1990) 221 Calloiope.3d 692, 727 - 728, 270 Cal.Rptr. 650, 667 - 668; see also *San Franciscans for Reasonable Growth v. City and County of San Francisco* (1984) 151 Calloiope.3d 61, 198 Cal.Rptr. 634, 645.] In *Kings County Farm Bureau*, a court reviewed whether a final EIR was inadequate because it failed "to evaluate whether water would be available for ground water recharge as contemplated by [a] mitigation agreement." [*Kings County Farm Bureau*, 221 Calloiope.3d at 727 - 728, 270 Cal.Rptr. at 667.] The court in *Kings County Farm Bureau* found that the EIR in question was inadequate, in part, because the public agency found the ground water impacts from the project to be insignificant based upon a mitigation agreement which called for the purchase of ground water supplies without specifying whether such water, in fact, was available. [*Kings County Farm Bureau*, 221 Calloiope.3d at 727 - 728, 270 Cal.Rptr. at 667 - 668.]

In *San Franciscans for Reasonable Growth*, the court reviewed the City of San Francisco's analysis of a traffic mitigation measure as set forth in the city's EIR. [*San Franciscans for Reasonable Growth*, 151 Calloiope.3d at 79, 198 Cal.Rptr. at 643.] The court noted that the traffic mitigation measure set forth in the city's EIR simply required "that the project's sponsor help [the transportation agency] expand its capacity by paying an unspecified amount of money at an unspecified time in compliance with an as yet unenforced or unspecified transit funding mechanism." [*San Franciscans for Reasonable Growth*, 151 Calloiope.3d at 79, 198 Cal.Rptr. at 644.] The court concluded that such mitigation measure was inadequate to mitigate both project specific and cumulative traffic impacts. [*Id.*]

Response

97. See responses 79 and 80 above.

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Moreover, courts have held that it is impermissible to defer the development and implementation of concrete mitigation measures until after project approval. [*Sundstrom v. County of Mendocino* (1988) 202 Callopie.3d 296, 248 Cal.Rptr. 252.]

98 With regard to the school mitigation condition as proposed for this Land Use Proposal, absent a provision requiring full mitigation as stated above, the Mitigation Measure is inadequate. Because the amount of funding is undefined, the finding of mitigation to beyond a level of significance is speculative and impermissible under CEQA. [See, e.g., *San Franciscans for Reasonable Growth*, 151 Callopie.3d at 79, 198 Cal.Rptr. at 643-644.] Accordingly, the District suggests the Draft MEIR be modified to fully mitigate School Facilities impacts as required by CEQA.

99 This Land Use Proposal, further, is distinguishable from the project in the recent case *Goleta Union School District v. Regents of the University of California* (1995) 36 Callopie.4th 1121, 44 Cal.Rptr.2d 110. In *Goleta*, the Court of Appeal held that classroom overcrowding, in and of itself, was not a significant environmental effect under CEQA, and that the EIR in question did not have to show how to alleviate projected enrollment increases or commit funds for new classrooms. In *Goleta*, however, the subject EIR dealt with the potential expansion of the University of California at its Santa Barbara campus, not the certain addition of new homes and a definite increase in student population. Moreover, in *Goleta* no environmental effects were identified other than school costs. With this Land Use Proposal, on the other hand, a substantial physical impact on the environment would be created in that new students would be added to already overcrowded school systems. Further, in *Goleta* no new school construction was necessary, while with this Land Use Proposal under Scenario No. 1, three new elementary schools, one junior high and an optional junior high school, and two high schools (one public and one private) will be built and will have concomitant environmental impacts. Finally, unlike *Goleta*, there will be significant cumulative impacts in the District from this and other projects within the NCFUA. We note that the Draft MEIR did discuss the cumulative effect of the Land Use Proposal on the District's School Facilities when combined with other future development projects within the District's boundaries.

2. Human Health and Safety

100 The Draft MEIR does not discuss the environmental impacts related to human health and safety related environmental impacts resulting from the Land Use Proposal in the event that the School Facilities required by the District as a part of the Land Use Proposal are not concurrently constructed due to lack of resources being available to the District. Additionally, the Draft
101 MEIR must also address the safety issues raised by the alignment of SR-56.

Response

98. See responses 79 and 80 above.

99. See responses 79 and 80 above.

100. The operation of school facilities is not an impact of this development proposal and wholly within the control and responsibility of the School District.

101. No extraordinary safety issues related to the alignment(s) of SR-56 have been identified. It is expected that proper engineering design of the freeway and standard safety procedures related to school operations would preclude safety impacts.

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102 The Draft MEIR does not recognize that School Facilities are utilized as emergency disaster centers and as civic centers under Section 38130 *et seq.* of the Education Code. In the event of an earthquake or other disaster, the School Facilities would operate as emergency disaster centers. If a disaster should occur, such as an earthquake, the residents of Subarea III would be unable to travel to other emergency disaster centers outside the area due to the destruction resulting from such disaster. The Draft MEIR does not discuss the significant effects from such impacts and any possible mitigation resulting from the failure to provide for emergency disaster centers or centers for civic activities as contemplated by such statutory provisions. These health and safety environmental impacts must be mitigated to a level of insignificance prior to any approval by the City. These must also be reviewed together with cumulative impacts of other future developments.

103 In addition, the Draft MEIR does not adequately discuss the environmental impacts which result from overcrowding of School Facilities should School Facilities not be concurrently constructed. Increasing the number of students on a particular school site, will undoubtedly have significant environmental impacts due to increased health and safety risks. Apart from reducing the size of playgrounds to accommodate interim portable classrooms and affecting the physical health and training of the students, there is an increased exposure to transmittable diseases, which will be more easily transmitted when class size and/or the number of students at a particular school site is increased. Also, overcrowded schools will result in impacts to restroom facilities, assembly seating, student walkways, school site access, outdoor physical areas, and parking.

Each of these environmental impacts are significant; however, such impacts are not discussed in the Draft MEIR. Accordingly, the Draft MEIR must discuss such health and safety impacts and propose concrete Mitigation Measures to mitigate such significant impacts.

3. Traffic and Circulation Impacts

104 The new schools identified in the Land Use Proposal will create the need to transport students to and from school each day. These trips would involve both busses and parents transporting their own children, and possibly over major arterials. Accordingly, the District requests that the MEIR discuss the impact of student transportation which will result from the Land Use Proposal and measures to mitigate such impacts. Additionally, the traffic circulation and street improvement plans should consider student safety for school site ingress and egress.

Response

102. The comment suggests that school facilities are required to be constructed to serve as emergency disaster centers and as civic centers pursuant to the Education Code. This is not what the Education Code requires and construction of such centers is not a required measure to mitigate any possible impacts of construction of the development project.

103. See response 100 above.

104. See responses 94 and 102 above.

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B. NECESSARY FINDINGS UNDER CEQA.

Public Resources Code Section 21081 states 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 . . . unless the public agency makes one, or more, of the following findings":

- (a) that changes have been made which mitigate or avoid the significant effects;
- (b) that the necessary mitigation measures are within the responsibility and jurisdiction of another public agency; or
- (c) that specific economic, legal, social, technological or other considerations make infeasible the mitigation measures. [Public Resources Code Section 21081.]

105 Presently, it would be improper for the City to make any of the above three findings.¹¹ With regard to the first possible finding (i.e. that changes have been made which mitigate or avoid the significant effects), as discussed above, the proposed Mitigation Measure for School Facilities as it does not, as currently proposed, adequately mitigate such impacts.

With regard to the second possible finding, (i.e. that the necessary Mitigation Measures are within the responsibility and jurisdiction of another public agency), CEQA Guidelines Section 15091 provides that such finding cannot be made if the agency making the finding has *concurrent* jurisdiction to impose the mitigation measure. [CEQA Guidelines Section 15091(c).]

106 Accordingly, since the City has jurisdiction with regard to School Facilities and health/safety mitigation with regard to its ability to deny legislative approvals of new development in the absence of adequate School Facilities, the City cannot make this second finding.

107 With regard to the third finding, (i.e. that specific economic, legal, social, technological or other considerations make infeasible the mitigation measures), there is no substantial evidence

¹¹ In order to make any of these three findings, the discussion in CEQA Guidelines Section 15091 requires that the City: (1) make the ultimate finding called for in the statute; (2) that the finding must be supported by substantial evidence in the record; and (3) an explanation must be present to supply the logical step between the ultimate finding and the facts in the record.

Response

105. See responses 79 and 80 above. In addition, findings are made by the City Council in connection with approval of a project based upon evidence before the Council. It cannot be determined at this time whether such findings will be made and, if made, the basis for such findings

106. See response 105 above.

107. See response 105 above.

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before the City that the mitigation proposed by the District requiring full mitigation of School Facilities impacts (as well as the other impacts discussed above) is infeasible on the basis of economic, legal, social, technological or other considerations. The decisions of *Mira Development Corp. v. City of San Diego* (1988) 205 Cal.3d 1201, 252 Cal.Rptr. 825; *William S. Hart Union High School District v. Regional Planning Commission* (1991) 226 Cal.3d 1612, 277 Cal.Rptr. 645; and *Murrieta Valley Unified School District v. County of Riverside* (1991) 228 Cal.3d 1212, 279 Cal.Rptr. 421, authorize the City to consider the adequacy of School Facilities in considering legislative actions.

C. GENERAL PLAN

Government Code Section 65300.5 requires that the elements of a general plan comprise an integrated, internally consistent and compatible statement of policies. The Public Facilities, Services And Safety Element of the City's General Plan, which incorporates Council Policies 600-10 and 600-22, requires developers to obtain letters of school availability from impacted school districts. [City of San Diego General Plan, at 289.] Under these policies and the General Plan, "developers are responsible for the cost of incremental facilities required to house the students expected to reside in the proposed development." [City of San Diego General Plan, at 291.] With this Land Use Proposal, as stated above, each new student generated will cause the need for additional School Facilities. Accordingly, if the Land Use Proposal is approved without providing for the full mitigation of School Facilities impacts, the approval would be inconsistent with the City's General Plan.

D. NCFUA FRAMEWORK PLAN and SUBAREA PLAN

The NCFUA Framework Plan requires the financing of public facilities be consistent with Section 8 of the Framework Plan. According to Section 8,

"No subarea plan will be adopted by the City Council without a letter from the relevant school district(s) indicating that the district concurs with siting, phasing and financing plans established by the subarea plan or by a concurrent school facility planning process. No subarea plan will be adopted without an agreement with the respective school district to compensate for any additional impact the development may have on schools." [NCFUA Framework Plan, at §8.3f, p. 106 (Emphasis added)].

Additionally, the school mitigation condition and school facilities requirement in the Subarea Plan provide that:

108. See responses 79 and 80 above.

BOWIE, ARNESON, WILES & GIANNONE

City of San Diego
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Page 15

Response

"Development projects within Pacific Highlands Ranch, excluding projects approved prior to adoption of this subarea plan by the City Council, must comply with School Mitigation Agreements (SMA) prepared in concert with the Del Mar Union, Solana Beach Elementary, and San Dieguito Union High School districts. The Pacific Highlands Ranch Subarea Plan includes the provision of three elementary schools, one junior high school, and one senior high school. All development impacts within Pacific Highlands Ranch shall be mitigated as required by applicable state law. Prior to securing buildings permits, individual owners will be required to enter into SMA's with affected school districts which set forth the terms and methods for mitigating impacts to school facilities."

"Owners of development projects which contain land designated as a school site in the Pacific Highlands Ranch Subarea Plan, excluding development projects approved prior to adoption of this subarea plan by the City Council, are required to enter into school site purchase agreements with affected school districts. School site purchase agreements shall be negotiated to satisfaction of the affected school district's prior to or concurrent with adoption of the subarea plan. The subarea plan shall not be effective until purchase agreements are fully executed by the affected parties. These purchase agreements shall commit owners of designated school sites to sell those sites to the affected school district and commit the school district to buy those sites. The terms of the purchase agreements shall be negotiated between the relevant owner and the affected school district."
[Subarea Plan, page 67.]

- 109 The Subarea Plan is consistent with the NCFUA Framework Plan provided that the Mitigation Measure is revised to provide for specific mitigation payment amounts as indicated above.

E. REQUEST FOR NOTICE

- 110 Pursuant to Public Resources Code Section 21092.2, we hereby request that copies of all notices and other documents mailed or distributed relative to the Land Use Proposal be furnished to the District at its office, located at 225 Ninth Street, Del Mar, California, 92014-2716, to the attention of Mr. Thomas F. Bishop, Superintendent; and to our offices to the attention of Alexander Bowie. If there are any fees or charges required for the provision of such notices,

109. See responses 79 and 80 above.

110. Comment noted.

BOWIE, ARNESON, WILES & GIANNONE

City of San Diego
May 18, 1998
Page 16

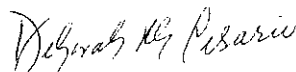
please provide our office with an invoice for such costs and we will pay such costs. This Request for Notice specifically includes, but is not limited to, notices of all hearings, proposed actions to be taken with regard to the developmental process, requests for information, draft environmental documents, staff reports or commentaries, and, in particular, any Draft, responses to, or Final MEIR prepared, furnished or filed with regard to this Land Use Proposal pursuant to the California Environmental Quality Act ("CEQA") and copies of all Planning Commission and City Council Agendas where this matter will be calendared.

F. CONCLUSION

- 111 In order to ensure that the impacts from the Land Use Proposal are fully mitigated, the District respectfully requests that Planning Commission approval of the Subarea Plan be deferred until a Mitigation Agreement is executed by the Owner (Pardee) and District. The Mitigation Agreement with the Owner should also be included in the Technical Appendices to the MEIR and the Subarea Plan. Furthermore, the Mitigation Measures and monitoring program also shall require that prior to approval of any legislative or discretionary residential development application, or issuance of a building permit within the Subarea Plan, the remaining SP III Owners within Subarea III shall enter into a Mitigation Agreement. These Mitigation Agreements shall require the Owner and SP III Owners to fully mitigate the significant impacts to be incurred by the District and to pay specified mitigation payment amounts as set forth above.
- 112 Moreover, the District respectfully requests that the Draft MEIR be revised to include a discussion regarding the significant impacts discussed above relating to traffic and health and safety concerns, as well as the Purchase Agreements.
- 113 Also, we believe the Land Use Proposal including Subarea Plan 1 and Subarea Plan 2 lacks the definite and certainty to allow the MEIR to be prepared until one Subarea Plan is approved. On the basis of the foregoing, it is respectfully submitted that the City should defer these proceedings until a decision is made on SR-56. Hence, we request that the comment period be extended for a reasonably amount of time after the City Council has decided whether to approve SR-56 Alignment "F" or Alignment "D".

Very truly yours,

BOWIE, ARNESON,
WILES & GIANNONE

By 
Deborah R.G. Cesario

Response

111. See responses 79 and 80 above.

112. See response 94 above.

113. See response 81 above.

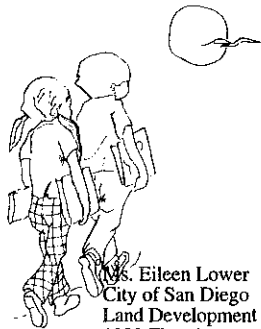
BOWIE, ARNESON, WILES & GIANNONE

City of San Diego
May 18, 1998
Page 17

DRC:ad
Enclosure

cc: Mr. Thomas F. Bishop, Superintendent, Del Mar Union School District
Ms. Katherine Tanner, Del Mar Union School District
Mr. Rich Duvernay, Esq., Office of the City Attorney
Ms. Cathy Winterrowd, Development Services - Land Development Review Division
Mr. Benjamin Dolinka, David Taussig & Associates, Inc.
Mr. Alexander Bowie, Esq.

Response



solana beach school district

BOARD OF EDUCATION
LINDA A. POTTER, President
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ELLIE TOPOLOVAC, District Superintendent

Response

Ms. Eileen Lower
City of San Diego
Land Development Review Division
1222 First Avenue
Mail Station 501
San Diego, California 92101

RECEIVED

MAY 1 1998

ENVIRONMENTAL ANALYSIS
SECTION

Re: Draft Master Environmental Impact Report
Pacific Highlands Ranch

Dear Ms. Lower:

The Solana Beach School District ("District") appreciates the opportunity to comment upon the draft Master Environmental Impact Report ("MEIR") for the Pacific Highlands Ranch Project (the "Project") located in Subarea III of the North City Future Urbanizing Area. Development of Pacific Highlands Ranch, depending on various alternatives, would result in approximately 5,000 new residential units, some of which would be located within the boundaries of the District and others within the boundaries of the Del Mar Union Elementary School District ("Del Mar"). As set forth in more detail below, any of the Project alternatives will create a substantial and cumulative physical impact upon the District's facilities, and will result in the need for additional school sites and school facilities.

Table S-1 of the MEIR rightfully concludes that the Project would create a significant direct and cumulative impact on school facilities. The mitigation measure set forth therein is as follows:

Mitigation of the Project's direct impacts to schools expected to serve the Subarea would be accomplished by the development of the proposed on-site schools. At the time tentative maps are processed, agreements between the affected school districts, the applicant, and the City would be required to ensure that impacts on educational services are mitigated to below a level of significance.

- 114 The District is please to report that it has been meeting on a regular basis with representatives of Pardee Construction Company ("Pardee"), the Project proponent, and that the parties have made substantial progress in developing a mitigation agreement and funding mechanism to provide for additional school mitigation agreement and funding mechanism to provide for additional school sites and facilities needed to house the students generated from the Project. The District expects these meetings to continue, and has found Pardee to be extremely cognizant of the impacts of the Project upon District facilities, and very amenable to providing full mitigation of those impacts. Prior to any action to approve the Project by the City Planning Commission

114. See response 79 to the Del Mar Union School District letter of comment.

Response

Ms. Eileen Lower
May 15, 1998
Page Two

or City Council, the District would request that Pardee be required to provide evidence of entering into a mitigation agreement which will provide for school impact mitigation at a level acceptable to the District. This has been the direction which Pardee and the District have been taking since discussion began approximately three months ago.

- 115 Before analyzing the impact of each possible development plan, the District must first object to the fact that the draft MEIR, while acknowledging that two elementary school districts will be affected by the Project (Solana Beach and Del Mar), makes no differentiation as to the number of residential units located in each of the two districts. Additionally, no maps were provided to show the boundaries of the two elementary districts and how those boundaries interface with the proposed alignments of SR-56, as discussed in the draft MEIR. Indeed, discussion of the Project's impacts (page 351 of the draft MEIR) would lead one to believe that a single elementary district will be serving the students of the Project. As a result, it is impossible for the District to adequately analyze the Project's impact upon its facilities based upon the information in the draft MEIR. The District has been able to obtain additional information from Pardee in order to formulate this response to the draft MEIR; however, the District requests that the final MEIR contain school impact information on a district-by-district basis rather than treating the Project as though it affects only one elementary district.

Taking each of the Project alternatives individually, the District's comments are as follows:

- 116 1. **Subarea Plan 1 (SR-56 Alignment "F").** This alternative, commonly referred to as "Alignment F" herein, would create from 4,974 to 5,456 residential units of varying types, and provides for a total of three elementary school sites. Since it is not possible to determine from the draft MEIR how many of these dwelling units are within District boundaries, the District requested supplementary information from Pardee, a copy of which is attached hereto as Exhibit A. That information shows that Alignment "F" will produce 2,109 residential dwelling units within District boundaries, including 1,937 new single-family detached units, 148 single-family detached units and 24 multi-family attached units from Del Mar Highlands Estates (another Pardee project which has already received City approval and which is the subject of a separate agreement between Pardee and the District). Using the District's Student Generation Factor (SGF) of .434 for single-family homes and .131 for multi-family attached homes, those 2,109 units will produce 909 new elementary students. As stated at page 343 of the draft MEIR, existing District facilities are too far away (3.5 miles) to serve students from the Project on a long-term basis. Additionally, there is no space available on any of the District's campuses for 905 new students. Existing school facilities are at, or over, capacity and 43 portable buildings have already been added to temporarily house students beyond permanent capacity. Therefore, Alignment "F" will result in the need for approximately one and one-third new elementary schools located on two new school sites. The cost in 1998 dollars for a 10-acre school site and a complete elementary school is approximately \$14 million.
- 117 Alignment "F" identifies two elementary school sites (Figure 3-1). One is a 10-acre site adjacent to a 5-acre park, and the other is a stand-alone 10-acre school site. The District is satisfied with the general location of these two sites and specifically requests that both sites be reserved if Alignment "F" is selected. The District will not object to the second school site (the 10-acre stand-alone site) having underlying zoning for residential development,

115. See response 84 to the Del Mar Union School District letter of comment.

116. The Del Mar Highlands Estates project is not part of the current project. This project was previously approved by the City Council and is not analyzed in this EIR.

117. Comment noted.

Response

Ms. Eileen Lower
May 15, 1998
Page Three

- 118 Alignment "F" identifies two elementary school sites (Figure 3-1). One is a 10-acre site adjacent to a 5-acre park, and the other is a stand-alone 10-acre school site. The District is satisfied with the general location of these two sites and specifically requests that both sites be reserved if Alignment "F" is selected. The District will not object to the second school site (the 10-acre stand-alone site) having underlying zoning for residential development, should the District determine that it does not need a second school site in that area. However, it must be clear that the site may not be developed as other than a school site without the District's written approval.
- 119 At this time, the boundary between the District and Del Mar is not along existing and/or proposed major streets. Therefore, it is very likely that a boundary adjustment between the two districts will be required in order to prevent students in the same neighborhood from going to schools in different districts. Alignment "F" provides for the least required adjustment to the existing boundary which could be adjusted to run along Del Mar Heights Road and Carmel Valley Road. Therefore, even though Alignment "F" produces more students for the District, the District supports Alignment "F" as the preferred Subarea plan so long as: (1) two elementary school sites are provided, and (2) the District has entered into an agreement with Pardee for full mitigation.
2. **Subarea Plan 2 (SR-56 Alignment "D").** Subarea Plan 2 (commonly known as Alignment "D") incorporates a more northerly alignment for SR-56. According to the draft MEIR, this would result in 4,973 to 5,414 additional residential dwelling units. Again, while it cannot be determined from the draft MEIR itself, information from Pardee indicates that Alignment "D" would include 1,195 single-family detached units and, including Del Mar Highlands Estates, the total units would be 1,367.
- 120 Using the District's SGF, 587 new students would be generated. Alignment "D" would thus clearly require one new elementary school site and school. However, the District is very concerned that the Project could generate more students than anticipated or that, because of density transfers or school district boundary realignments, additional students could be generated from Alignment "D". Therefore, the District requests that "optional" school site No. 2 be maintained under Alignment "D", subject to underlying zoning which would permit residential use if the District determined it did not need the second school site.
- 121 Alignment "D" would require substantial revisions to existing boundaries between Del Mar and the District since the existing boundaries would run through the middle of numerous residential planning areas and would create slivers of property between District boundaries and SR-56. Therefore, the District does not support Alignment "D" as the preferred alternative plan.
3. **Central Alignment for SR-56.** The Central Alignment alternative is similar to the proposal for Alignment "F" and, based upon information received from Pardee, would result in the same number of single family detached residential units (2,109, including Del Mar Highlands). Therefore, approximately 909 new students would be generated, which would need to be housed in two new school facilities (the second school facility being only proportionally filled from this Project). According to Figure 8.6 in the draft MEIR, the Central Alignment for SR-56 would place all residential dwelling units north of SR-56. Therefore, a boundary adjustment between the two school districts along Del Mar Heights Road and Carmel Valley Road would be required.
118. Comment noted. The terms of the District's acquisition of a school site should be set forth in the mitigation agreement.
119. Comment noted.
120. These comments on the District's position on the proposed project Subarea Plans and the alternatives are acknowledged.
121. These comments on the District's position on the proposed project Subarea Plans and the alternatives are acknowledged.
122. These comments on the District's position on the proposed project Subarea Plans and the alternatives are acknowledged.

Response

Ms. Eileen Lower
May 15, 1998
Page Four

123 4. **Alternate Site Design - Plan 1.** Chapter 8 of the draft MEIR discusses Project alternatives, one of which is an alternate site design for Plan 1 (Alignment "F"). The District adamantly opposes this alternate since it does not include any elementary school site within District boundaries. As previously indicated, the draft MEIR states that the District does not have sufficient school facilities to serve these students.

124 5. **Alternate Site Design - Plan 2.** The District's comments with regard to this alternate site design for Alignment "D" are the same as for Alignment "F". Again, this design does not include any elementary school sites or facilities to serve the Project. On that basis alone, the alternate site design for Plan 2 is unacceptable.

6. **Development without a Phase Shift.** The District recognizes that approval of Alignment "F" or Alignment "D" must be given by the voters before the Project can proceed within either of those parameters. However, Pardce had underlying approval for A-1-10 zoning without Phase Shift Election approval and, with clustering, could build approximately 551 units. Figure 8-3 shows the non-phase alternative for Alignment "F", and does not indicate that any school site would be available within the District's boundaries under that alternative. It appears that approximately 245 residential units (which the District must assume are single-family attached) would be within the District's boundaries.

125 Using the SGF of .434, this would generate approximately 107 students. The District requests that a school site of at least 10 net usable acres be required, even under the non-phase shift alternative for Alignment "F", since the District has no school facilities in that location and would need at least a small elementary school to serve this Project and potentially other projects within the North County Future Urbanizing Area.

126 If Alignment "D" were selected under a non-phase shift plan, the impact on the District would actually be greater than under the non-phase shift Alignment "F". Under non-phase shift Alignment "D" 358 units appear (since no streets or district boundaries are shown) to be within the District's boundaries, which would generate 156 new elementary school students (see Figure 8-4). Again, the District requires the reservation and identification of one school site of ten net usable acres in an acceptable location.

The District appreciates the fact that the City has always taken school facilities into account when determining the impact of a residential development project upon the environment.

127 The draft MEIR indicates that 1,291 new elementary school students would result from the Project, to be housed in either the Del Mar or Solana Beach school districts, which are both already operating above capacity. School impacts are environmental impacts, and must be adequately mitigated. El Dorado Union High School District v. State Board of Education (1983) 144 Cal. App. 3d 779. At the legislative approval stage, the City has a great deal of latitude in determining appropriate mitigation. Murrieta Valley Unified School District v. County of Riverside (1991) 228 Cal. App. 3d 1212. Overcrowded schools create a negative physical impact upon the environment and upon school districts. Double sessions are not a viable alternative, and portable units can be used only until needed playground space is lost. Furthermore, while portable classrooms can be added on a temporary basis, overcrowding affects core facilities such as restrooms, cafeterias, libraries, etc. which cannot be easily expanded. Finally, overcrowding causes stress among staff and students and creates potential safety hazards.

123. These comments on the District's position on the proposed project Subarea Plans and the alternatives are acknowledged.

124. These comments on the District's position on the proposed project Subarea Plans and the alternatives are acknowledged.

125. The non-phase shift alternatives could be pursued if the City Council does not approve the project and the voters do not approve the proposed phase shift. No affirmative action is proposed or requested nor will any action be taken to adopt the non-phase shift alternatives.

126. The non-phase shift alternatives could be pursued if the City Council does not approve the project and the voters do not approve the proposed phase shift. No affirmative action is proposed or requested nor will any action be taken to adopt the non-phase shift alternatives.

127. See responses 79 and 80 to the Del Mar Union School District letter of comment.

Response

Ms. Eileen Lower
May 15, 1998
Page Five

128 California Environmental Quality Act ("CEQA") Guideline 15064 (f) makes it clear that if a project would cause overcrowding of a public facility resulting in an adverse affect upon people, the overcrowding is regarded as a significant effect. It is impossible for the District to house all of the students that will be generated from the Project in existing school facilities. Therefore, the District respectfully requests that Pardee be required to enter into an agreement for full mitigation according to District standards, as well as a financing method in order to achieve the necessary result, prior to approval of the Project by the City's Planning Commission. Although the District is generally confident that an agreement with Pardee will be reached within the next few weeks, it nevertheless wishes to protect its interests through this letter.

If you have any questions or need additional information, please do not hesitate to contact me.

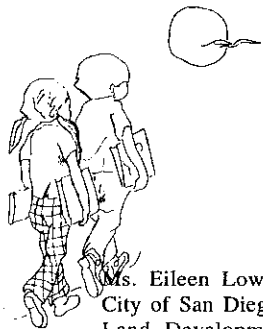
Very truly



Ellie Topolovac
Superintendent

cc: Board of Education
Ski Harrison
Benjamin Dolinka
Len Frank/Pardee Construction

128. See responses 79 and 80 to the Del Mar Union School District letter of comment.



solana beach school
district

BOARD OF EDUCATION
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ELLIE TOPOLOVAC, District Superintendent

Response

Ms. Eileen Lower
City of San Diego
Land Development Review Division
1222 First Avenue
Mail Station 501
San Diego, CA 92101

RECEIVED

JUN 1 1988

ENVIRONMENTAL SERVICES
DIVISION

Re: Draft Master Environmental Impact Report
Pacific Highlands Ranch

Dear Ms. Lower:

- 129 Enclosed please find Exhibit A to the Solana Beach School District's response. If you would please attach this to our response as it was left off of the original sent to you on May 15th.

Thank you and if you have any questions please call me at 619-755-8139.

Sincerely,

Linda Bechtel

Linda Bechtel
Administrative Services

Enc.

129. Comment noted

PR-57

EXHIBIT A
DEL MAR HIGHLANDS ESTATES & PACIFIC HIGHLANDS RANCH
RESIDENTIAL UNIT AND STUDENT GENERATION ANALYSIS

	Alignment "P"	Alignment "D"	Central Alignment
Solana Beach School District:			
Residential Units:			
Single Family Units	2,085	1,343	2,085
Multifamily Units	0	0	0
Total Units	2,085	1,343	2,085
Student Generation:			
Single Family Students (.434 Students per SF Unit)	905	583	905
Multifamily Students (.131 Students per MF Unit)	0	0	0
Total Students	905	583	905
Del Mar Union School District:			
Residential Units:			
Single Family Units	1,543	2,285	1,871
Multifamily Units	1,494	1,494	1,494
Total Units	3,037	3,779	3,365
Student Generation:			
Single Family Students (.472 Students per SF Unit)	728	1,079	883
Multifamily Students (.148 Students per MF Unit)	218	218	218
Total Students	946	1,297	1,101
Total Residential Units:			
Single Family Units	3,628	3,628	3,956
Multifamily Units	1,494	1,494	1,494
Total Units	5,122	5,122	5,450
Total Students:			
Single Family Students	1,633	1,681	1,788
Multifamily Students	218	218	218
Total Students	1,851	1,899	2,006

Run Date: 4/27/98

EXHIBIT A

Response

San Dieguito
Union High School District

Facilities Planning Dept.

710 Encinitas Blvd.
Encinitas, CA 92024-3357
(760) 753-6491
FAX (760) 943-3508

Response

May 18, 1998

Eileen Lower, Environmental Planner
City of San Diego
Development and Environmental Planning Division
1222 First Ave., Mail Station 501
San Diego, CA 92101

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MAY 18 1998

ENVIRONMENTAL ANALYSIS
SECTION

RE: Pacific Highlands Ranch (Subarea III)
Response to Draft Master Environmental Impact Report

Dear Ms. Lower:

This letter will serve to clarify information about San Dieguito Union High School District in the Draft Master Environmental Impact Report.

- 130 In the last paragraph on page 343 of the Draft Master EIR, the report states that Earl Warren and Torrey Pines are operating at 94 % and 93% of permanent capacity. This is incorrect. Earl Warren and Torrey Pines are operating at 158% and 139% of permanent capacity. This is based on the following capacity data:

School	Permanent Capacity	Temporary Capacity	Total Capacity	Enrollment as of 12/97	Enrollment as a Pct. of Perm. Capacity
Earl Warren Jr. High	655	485	1,140	1,038	158%
Torrey Pines High	1672	510	2,182	2,316	139%

- 131 In Table 4L-1 on page 344, the Student Generation Rates shown are incorrect and incomplete. We use the following Student Generation Rates on a district wide basis to calculate projected enrollment and facility financing:

	Single Family Dwelling	Multi-Family Dwelling
Grades 7 - 8	0.11	0.02
Grades 9 - 12	0.22	0.07
Total	0.33	0.09

130. The final MEIR has been revised to reflect these capacities for Earl Warren Junior High and Torrey Pines High schools.

131. The final MEIR has been revised to reflect these student generation rates.

Page Two
Ms. Eileen Lower
May 18, 1998

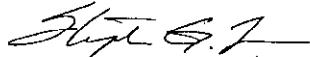
Response

132 We want to reiterate our concern about the over-crowding of our school facilities that will serve this area. Any increase in population will exacerbate the situation. These factors in conjunction with the unavailability of state funds for school construction has necessitated our district's Board of Trustees to adopt a policy requesting developers to fully mitigate the impact of their project on the district's school facilities. Our position on the full mitigation of development impacts on our school facilities remains unchanged.

San Dieguito Union High School District appreciates the opportunity to provide information in response to concerns about the project. We look forward to working with the property owners, developers and representatives of the City of San Diego to ensure that adequate school facilities are available in a timely manner to serve the residents of the San Dieguito Union High School District.

If you have any questions, please feel free to contact me at (760) 753-6491 ext. 5518.

Sincerely,



Stephen G. Ma
Director, Facilities Planning

cc: Eric Hall, Asst. Superintendent, Business Services
Bill Berrier, Superintendent

132. Comment noted. School impacts to the District would be mitigated per the requirements described in the final MEIR.



San Diego County Water Authority

A Public Agency
3211 Fifth Avenue • San Diego, California 92103-5718
(619) 682-4100 FAX (619) 297-0511

May 18, 1998

Response

Ms. Eileen Lower, Environmental Planner
City of San Diego
Land Development and Review Division
1222 First Avenue, Mail Station 501
San Diego, CA 92101

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MAY 18 1998

ENVIRONMENTAL SERVICES
SECTION

Dear Ms. Lower:

Review and Comment on the
Draft Master Environmental Impact Report for Pacific Highlands Ranch (Subarea III)
Subarea Plan in the North City Future Urbanizing Area (NCFUA), SCH# 97111077

Thank you for providing the San Diego County Water Authority (Authority) with a copy of the above-referenced document. We have reviewed relevant portions of the documents and offer the following concerns and comments.

Right of Way

- 133 The Authority requests notification and consultation from the City's Land Development and Review Division if any aspect of the proposed project conflicts with or may impact Authority ROW or facilities. Please contact Fred Clark of the Right of Way Department at (619) 682-4167 regarding proposed improvements affecting any Authority rights of way.

Public Facilities and Services

- 134 In the water section (page 349), existing, planned and proposed water treatment and distribution facilities are discussed. It states the proposed Carmel Mountain Road Pipeline is required and will ultimately affect supply to the Pacific Highlands Ranch. However, in the impacts to water service (page 355), it says: *The existing regional infrastructure would be sufficient to provide the projected water consumption volume. Local improvements would be required to bring water to the site.* Please clarify what is meant by "regional infrastructure", if it is the Authority or the City's domestic water system. In addition, the Authority strongly recommends and encourages a letter of commitment

133. The County Water Authority will be notified as requested.

134. The Carmel Mountain Road pipeline is a planned regional Capital Improvement Project which could affect the water supply to Pacific Highlands Ranch. Appendix B of the Pacific Highlands Ranch Subarea Plan identifies the water infrastructure requirements which would be needed to accommodate buildout of the proposed project. The facilities that would serve the community and the options for meeting the future needs are included. A Public Facilities Financing Plan has also been developed which identifies the necessary on-site water pump stations.

MEMBER AGENCIES

PR-61

Response

Ms. Eileen Lower
May 18, 1998
Page 2

135 from the City to withstand a ten day outage of Authority water supplies. The Authority recommends that the analysis of water service include a discussion of the present and future conditions with respect to the regional water supply. The document should recognize that the cumulative impacts of similar development throughout the county will require further additions to the regional water supply and distribution infrastructure to maintain acceptable levels of public service.

136 Illustrate in Table 4L-4 "Estimated Water Usage" (page 356) the reductions in water use that could be achieved through the use of reclaimed water to be consistent with the text on page 349 (e.g., provide an additional column to display a new total with appropriate land use areas subtracted.)

137 Also, include (in this section or in water conservation section) a table showing quantity of existing agricultural water use. This table would quantify the statement (page 364) "trade one kind of water use for another. It is not clear as to whether the quantity traded will be equivalent, but it is implied. This table or additional text would quantify the claim of deferred usage.

Conservation

138 Add in the first paragraph (page 362), that San Diego County is an ex officio member agency of the Authority. Also state that the Authority is a water wholesaler, and purchases the imported water from Metropolitan Water District and the member agencies are the retailers who provide water to the general public.

139 The Authority supports the City's Land Development and Review Division's conservation measures emphasizing innovative water supply techniques involving local water resources, reclamation and watershed management. Mitigation measures for conservation should also incorporate water conservation requirements such as the use of xeriscape landscaping techniques, a discussion of the potential uses of reclaimed water and Best Management Practices for water conservation. Water conservation is imperative in Southern California and conservation measures need to be detailed in the Master FEIR. If you have any questions about conservation measures, contact Bill Jacoby of the Water Resources Department at (619) 682-4156. The Authority also encourages development of water reclamation, groundwater recovery projects and administers financial assistance programs for their development. For more information on the Authority's water reclamation policies and programs, call Cheryl Munoz of the Water Resources Department at (619) 682-4154.

135. Comment noted. See response 134 above.

136. The use of reclaimed water is not a component of the Subarea Plan has not been included in this section of the EIR. The city of San Diego reduced the scope of the optimized service area for reclaimed water distribution and as part of that determination there is no surety that a reclaimed water system would be provided to this portion of the city.

137. The final MEIR has been revised to clarify this statement.

138. The additional information has been added to the final MEIR.

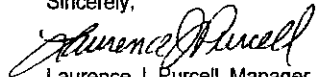
139. Comment noted.

Response

Ms. Eileen Lower
May 18, 1998
Page 3

Please retain the Authority on your mailing list to receive the Master FEIR and other information concerning this project. If you have any questions, please contact Melissa Dargis at (619) 682-4267.

Sincerely,


Laurence J. Purcell, Manager
Water Resources

LJP/mmd

cc: Fred Clark
Bill Jacoby
Cheryl Munoz
Mel Spell

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Response

MEMORANDUM

DATE: June 2, 1998 SRTP 820.11 PC(220)
TO: Eileen Lower, City of San Diego
FROM: DeSean Savage
SUBJECT: Pacific Highland Ranch (DEIR)

MTDB has reviewed the proposed project with respect to the Framework Plan for the North City Future Urbanizing Area (Framework Plan) and the City's Transit Oriented Development (TOD) Guidelines. As identified in the Framework Plan, Subarea III will include the single largest activity center in the Future Urbanizing Area, and, as such has the highest potential for transit ridership. In general, MTDB believes that the Pacific Highlands Ranch Draft Subarea Plan generally incorporates some of the guidelines set forth in both documents. However, MTDB recommends the following specific modifications be incorporated into the Plan to ensure overall consistency with the Framework Plan and TOD Guidelines.

- 140 1. Park and Ride- The proposed park and ride facility should consist of approximately 100 parking spaces and should be located at the proposed Transit Center to support and encourage transit usage. In addition, consideration should be given for the park and ride lot be shared with adjacent development in the proposed Village area.
- 141 2. Linkage to Employment Center- Transit ridership would be greatly enhanced with a pedestrian path connecting the Transit Center to the Employment Center. The path should be located along the public right-of way with landscaping and connect to the primary building entrances in the employment center.
- 142 3. Pedestrian Environment- The Framework Plan calls for "a high quality pedestrian environment" and "sidewalks with street trees along all public and private streets" As such, the proposed 6 and 4-Lane Major Roads should be modified to provide non contiguous sidewalks with street trees along the public right-of-way (Exhibit 4-5). In addition, the 6 and 4-Lane Major Roads divide the Village and Transit Center from the Community Park. It is recommended that narrow streets be considered in the core area and that enhanced pedestrian crossings be provided to connect the Village and Transit Center to the Community Park.
- 143 4. Transit Center Improvement Costs- MTDB expects that the costs associated with right-of-way acquisition, design and construction of the proposed Transit Center will be borne by the project developer consistent with development of the Mira Mesa Transit Center.

If you have any questions please contact Dave Schumacher at 557-4565 or Coleen Frost at 557-4533.

140. The park-and-ride facility has been modified in the Subarea Plan to accommodate 100 parking spaces next to the transit center. The relationship of the park-and-ride to the Village Center remains unchanged in the Subarea Plan.
141. Two pedestrian paths exist in the proposed subarea plans which would link the transit center to the employment center.
142. The design of sidewalks and street trees within the project area will be developed consistent with the Subarea Plan and to the satisfaction of the City Engineer at the time future development proposals are processed.
143. The applicant and City have been and will continue to work closely with MTDB to insure that transit amenities are completed as soon as sufficient population exist to justify them. Funding for the Park-and-Ride and Transit Center are included within the Public Facility Financing Plan and Facilities Benefit Assessment.



May 18, 1998

Ms. Eileen Lower, Environmental Planner
City of San Diego
Development Services
LAND DEVELOPMENT REVIEW DIVISION
1222 First Avenue, Mail Station 501
San Diego, CA 92101

Via Fax with original
to follow

Re: Pacific Highlands Ranch (Subarea III) Subarea Plan in the North
City Future Urbanizing Area (NCFUA)
- Comments on Draft Master Environmental Impact Report
LDR No. 96-7918 SCH No. 97111077

Dear Ms. Lower:

Thank you for the opportunity for the Fairbanks Ranch Association to comment on the Draft MEIR for Pacific Highlands Ranch Subarea Plan. The Association is concerned about the impacts that might result from a project of this magnitude, particularly as they relate to the traffic circulation for this area.

- The Traffic Circulation section of the Draft MEIR in Table 4B-9 notes that El Apajo Road is classified as a 2-lane Collector street and is projected to have
- 144 15,400 ADT or Level of Service "E". The document states on page 154 that the Pacific Highlands Ranch project will contribute more than two percent of the traffic to the El Apajo road segment. However, no mitigation is offered to lower the traffic impacts to acceptable levels. This oversight should be addressed in the Final EIR document.
- 145 Similarly, it appears that the Pacific Highlands Ranch project will contribute more than two percent of the future traffic on San Dieguito Road between Rancho Diegueno Road to El Camino Real. Table 4B-9 indicates traffic will reach 14,900 ADT or Level of Service "F" on this street segment. The only mitigation proposed by Subarea III is a traffic signal associated with the Del Mar Highlands Estates project. Additional mitigation such as the "Spot

Response

144. As shown on Table 20 of the traffic study, the project will contribute 4.6 percent of the projected ADT. This translates to only 457 trips. However, almost all (95 percent) of these trips are county residents that will use the new shopping facilities in the Subarea III Town Center or Subarea III residents that are attached to the Rancho Santa Fe Town Center area. No mitigation was suggested because county residents are provided local shopping opportunities in Subarea III which removes existing trips from other county roads in the area.
145. East of the Del Mar Highlands estates access to San Diegueno project traffic is a maximum of 109 ADT which is about 1 percent of the capacity of San Dieguito Road. Since project traffic is less than 2 percent the impact is not significant and mitigation is not required. The traffic report will be edited to break out the segment of San Dieguito Road east of the Estates access. For the impacted segment of San Dieguito Road, two improvements are required of the Estates project. Turn lanes and acceleration/deceleration lanes are provided at the estates access to San Dieguito Road and at Old El Camino Real; a raised median is to be installed so that only right turns in and out are permitted.

Response

Ms. Eileen Lower
City of San Diego
May 18, 1998
Page Two

Improvements" included in the Black Mountain Ranch project EIR should be included by Subarea III.

- 146 More generally speaking the Association would recommend that as recommended by the City in the phasing plan for Subarea I, no portion of Subarea III that has not been already approved should be allowed to proceed until the connection of SR 56 between I-5 and I-15 is assured.

The Fairbanks Ranch Association has an ongoing concern with all the projects in the NCFUA and would therefore request inclusion on the distribution list for all future mailings, distributions, and notifications regarding the MEIR and all aspects of project approval.

Sincerely,



David J. Abrams, AICP
General Manager
FAIRBANKS RANCH ASSOCIATION

146. Comment noted.

Response

CARMEL VALLEY COMMUNITY PLANNING BOARD
12760 High Bluff Drive, Suite 160
San Diego, CA 92130
PH: (619) 794-2500/FAX: 259-6173

May 9, 1998

Eileen Lower, Environmental Planner
LAND DEVELOPMENT REVIEW DIVISION
Development Services Department
1222 First Avenue, Fifth Floor
City of San Diego
San Diego, CA 92101

SUBJECT: PACIFIC HIGHLANDS RANCH (SA III) SUBAREA PLAN
IN THE NORTH CITY FUTURE URBANIZING AREA (NCFUA)
DRAFT MASTER EIR LDR NO. 96-7918 SCH NO. 97111077

Dear Ms. Lower:

The SA III/Neighborhood 8A/State Route 56 components of this proposal each play a major role in Carmel Valley's final design and community integrity. The community's long-term direct involvement with SA III and N8A focus any analysis of the DMEIR and the SA III (SA III) development proposal on two core issues:

- (1) The resulting impacts from a large-scale decrease in the Multiple Habitat Planning Area (MHPA) in SA III as a trade-off for preservation in N 8A;
- (2) How clearly the final MEIR lays out for the public and decision makers exactly what they are to decide and the land use and environmental policies and goals for each SA III and N 8A that should drive these decisions.

Multiple Habitat Planning Area (NHPA) Boundary Adjustment

The core of this proposal is to permit 150+ acres more development in SA III than permitted by the Council/State/Federal-adopted MHPA. The test of the DMEIR is whether it thoroughly addresses the above core issues. Specifically, does it adequately portray the land use and biological impacts of decreasing the MHPA in SA III by 150 acres? Are the DMEIR assessments of impacts and offsetting benefits consistent with existing goals and policies regarding the City's MHPA "Northern Tier Biological Core Area" in SA III and other adopted land use goals for the San Dieguito River Valley? We believe the DMEIR is deficient in both aspects for the following reasons:

147

147. This comment on the MHPA boundary adjustment is noted.

Response

Summary DMEIR Description of the MHPA Boundary Adjustment

"This action would amend the City's MHPA to include the sensitive habitats located in (N 8A) and Subarea V (Deer Canyon and Lorenz Parcels)...while removing other less sensitive areas within Pacific Highlands Ranch (approximately 150 acres) and (CV) N 10 (approximately 8.1 acres) from the preserve system....The boundary adjustment components include...an adjustment of the MHPA line to increase the size of the preserve within the (N 8A) area....Thus, the proposed MHPA boundary adjustment...is considered superior in biological value to the adopted MHPA." [S-16, 17 AND P. 61]

- 148 The Deer Canyon component is the "transfer of an additional 6 dwelling units in Subarea V...(60 acres) to the Lorenz Parcel (78 acres)...(to) allow construction of 46 dwelling units on the Lorenz Parcel." [p. 61] The DMEIR does not clarify the net gain to the MHPA of this transfer. Would this transfer development to MHPA-designated open space on the Lorenz Parcel? What portion of the Lorenz Parcel is now in the MHPA?

Assumptions About N 8A MHPA Boundary

- 149 Since the entire transfer of development footprint from N 8A onto SA III is considered "superior" to the existing MHPA lines in both, it is essential the final MEIR clarify that the MHPA boundary in N 8A has never been officially determined.

"Precise Plans will be amended, but these amendments will not be done concurrently with MSCP adoption....Neighborhood Plan amendments will be required for (N's) 8, 8A, and 10 of Carmel Valley....Preserve boundaries may be modified by City Council action on the...(N 8A) Precise Plan."
[MSCP Draft Joint EIR/EIS, pp. 12 and 25]

The City Council continued the 1994 N 8A proposal, requesting a more biologically viable plan. As a result, the Council purposefully left undetermined the MHPA boundaries in N 8A. "No action has been taken on any of the (N 8A) project components,... although (it) was analyzed in the final MSCP EIR." [P. 17]

Therefore, it is speculative for the DMEIR to base a "superior" rating on an undetermined boundary. It is accurate to say that this proposal would define the N 8A MHPA boundary, but to use as a base the "Compromise Plan" MHPA is inaccurate.

Arguments On Manipulating the MHPA With Two Separate Planning Areas

The boundary "adjustment" proposed is really taking nine MHPA areas in SA III/Gonzales Canyon and reducing them to the narrowest possible configuration in order to consolidate the MHPA in N 8A.

- 150 There is no question as to the importance of the entire N 8A/Carmel Mountain area in MSCP and Carmel Valley preservation goals or the DMEIR's treatment of this area. What has to be questioned, and thoroughly explained in the final MEIR, is the policy issue of depleting so severely MHPA lands in another primary habitat and biological area of importance to the City and the MSCP effort, an area important in its individual role in MSCP preservation and unique and critical geographically

148. Development rights would be transferred from the Deer Canyon Parcel to the western portion of the Lorenz Parcel which is not within the MHPA.

149. The MSCP EIR did analyze the Carmel Valley Neighborhood 8A Compromise Plan as a worst case, and found that it was biologically adequate. The Compromise Plan for Neighborhood 8A supported an earlier agreement among the City, CDFG, USFWS, and Pardee.

150. Comment noted. See letter of comment above from the U.S. Fish and Wildlife Service.

Response

- 151 This plan is considered "generally consistent with the MHPA" [p. 27]. However, the question is: "was the MHPA supposed to be adjusted in so broad a brush as to do wholesale reduction in an entire NCFUA Subarea, critical for its own role?"

We request the final MEIR address these core questions, by reviewing central MSCP/MHPA goals as described in the DMEIR:

"The MHPA is the area within which the permanent MSCP preserve will be assembled and managed....The MHPA is defined in many areas by mapped boundaries...and also is defined by quantitative targets for conservation of vegetation communities and goals and criteria for preserve design." [p. 16]

- 152 Within the above text is the central quandary of this proposal. "The MHPA is defined in many areas by mapped boundaries" confirms that MHPA value exists in both, SA III and N 8A, each important for different geographical reasons. They are distinct habitat and linkage areas with different MSCP roles.
- 153 The MHPA "also is defined by quantitative targets for conservation" means that habitat and linkages in SA III can be developed because an equation of x acres of Tier I, x acres of Tier II, etc. can be realized in N 8A. This second definition of the delineation of the MHPA is the guiding principle of this proposal.
- 154 We believe overemphasis of the second definition has caused an excessive removal of MHPA in the northwest SA III to render what's remaining of questionable value. Cannot this be seen as a conflict with the first definition which recognizes the necessity of preserving specific geographic areas, namely MSCP-priority SA III?

MSCP "Functional Equivalency" Test

Both N 8A and SA III are core biological areas targeted for preservation in the City's adopted Multiple Species Conservation Program (MSCP) Plan (1997):

"the central portion of the northern Preserve area is comprised of the heart of the City's...NCFUA Subareas 2,3,4 and 5...the San Dieguito Lagoon area, Gonzales Canyon, and most of the area lying between the communities of Carmel Valley and Rancho Penasquitos....The southwestern portion...(in) N 10 contains two major wildlife corridors that converge at CVREP, where they link to adjacent core habitat on and north of (N 8A)."[MSCP Subarea Plan, Volume II]

Now adopted, MHPA boundaries can be changed only by careful consideration of key factors. Overall, the result must be "the same or higher biological value for the preserve." [p. 103] Of particular interest are the following DMEIR assessments:

"3. Effects on habitat linkages and function of preserve areas: (The adjustment maintains affected natural linkages at a minimum width of 1,000 feet, and provides a large block of habitat within the middle of a major linkage (i.e., Gonzales Canyon) to allow breeding, foraging and other natural life functions to exist in the linkage.)"

151. The City of San Diego has found that the proposed adjustment meets all of the requirements of a functional equivalency finding. USFWS and CDFG have concurred with that finding. See also the letter of comment on the draft MEIR from the USFWS and CDFG.

152. This comment on the MHPA definition is noted.

153. This comment on MHPA habitat linkages is noted.

154. Comment noted. The proposed MHPA adjustment makes it easier for the City to meet conservation goals by increasing the amount of Tier I habitat that will be located within the MHPA.

Response

4. Effects on preserve configuration and management: (the adjustment generally either maintains the shape and size, or increases the size of the preserve...and will not affect either configuration or the necessary level of management.") [p. 104]

The DMEIR concludes that removal of 150+ acres of MHPA in SA III/Gonzales Canyon meets these tests and "is consistent with regional wildlife... efforts." [p. 20]

We agree that "the addition of approximately 75 acres of largely Tier 1 habitat.. in (N 8A) will greatly increase the size of the habitat block planned for this particular geographic area, improving the overall preserve design and configuration...." [p. 104]

- 155 We cannot agree that the MSCP equivalency test is being appropriately applied to justify this transfer, for the following reasons:

(1) Effects on habitat linkages and function of preserve areas: Encroachment of 44 acres into "Area 6" of the MHPA in Gonzales Canyon considerably reshapes and limits the "refugia" value of the primary coastal sage scrub slopes and mixed habitat area of Gonzales Canyon at a critical confluence of the NCFUA wildlife corridors (Subareas IV and V as well as the rest of SA III) into the western San Dieguito River Valley.

The critical importance of "Area 6" is supported by the City's own "Alternate Site Design - Plan 1 and Plan 2" [Figures 8-1 and 8-2] which not only leave this larger habitat area intact but also provide for its connection to the north with La Zanja canyon: [S-42]

How can this plan still "provide(s) a large block of habitat within the middle of a major linkage"? Development would cover 44 acres of +/-54-60 acres. Further, narrowing of the north-south Areas 7 and 8 corridors makes it even more critical as a small but necessary single expanse of habitat. Last, diminishing Areas 7 and 8 through the north-south corridor—what was to be the major NCFUA corridor system—cannot be found to "maintain affected natural linkages a minimum width of 1,000 feet" since "this new linkage would be approximately 600 feet to 900 feet wide. [p. 102]

Certainly the combination of reducing corridor areas 7 and 8 to 600-800 feet and encroaching 44 acres into the only remaining expanse of habitat (area 6) cannot meet the MSCP Functional Equivalency test for "Effects on preserve configuration and management" so that any adjustment "maintains the shape and size, or increases the size of the preserve...." [p. 104]

- 156 The MEIR would serve decision makers by addressing the following proscription for corridors from the "Wildlife Society Bulletin 20:431, 1992, pp. 434-440, which resulted from southern California research on "two types of corridor users":

"Passage species' need...e.g., dispersal of a juvenile, seasonal migration, or moving between parts of a large home range. Large herbivores and medium-to-large carnivores are typically passage species, (and) many migratory animals.... it is important to avoid assuming that anything big enough for the animals to walk through is a corridor...although these species do not have to meet all of their life requirements within the corridor, the corridor must provide conditions...that motivate the animal to enter and use the corridor....

155. The City of San Diego, USFWS, and CDFG have concurred with the finding that the proposed adjustment of the MHPA will result in a new MHPA that is functionally equivalent to the original MHPA. See letter of comment from the USFWS and CDFG.

156. The proposed adjustment maintains Gonzales Canyon at a minimum width of 1,000 feet and provides a "refugium" of roughly 140 acres. The City of San Diego has found that the proposed MHPA adjustment will maintain corridors that are functional, and the USFWS and CDFG have concurred with that finding. See letter from USFWS and CDFG.

Response

'Corridor dwellers need several days to several generations to pass through...the corridor must provide most or all of the species' life-history requirements...

For passage species... is the topography, vegetation and location such that the animal will *encounter* the entrance to the corridor? Is there sufficient shelter and concealment cover, food, and water for the animal on a journey of this duration?...For corridor dwellers...are the topography, vegetation, and location such that individuals will *encounter*, enter, and live in the corridor?....

The number of road crossings should be minimized....Bridged underpasses are preferable to culverts..."

Historical Importance of SA III/Gonzales Canyon in City Preservation Efforts

- 157 The DMEIR cautions that the MHPA SA III corridors... require restoration to enhance their long-term value." It would be more accurate to state the restoration goals for Gonzales Canyon/SA III of the following policy documents:

"San Dieguito River Regional Plan" (adopted by the City of San Diego 1984):

"Restoration is especially important whenever an area serves as a linkage or wildlife movement corridor...but only where preservation and appropriate buffers from human activities can be ensured....Open space preserves are proposed (including) the San Dieguito Lagoon, Gonzales and La Zanja Canyons...."

"San Dieguito River Valley Regional Open Space Concept Plan (approved by the Joint Power Authority 1990 and this Board 1989):

"Riparian Wildlife Corridor: This plan presents as a priority the goal to preserve valuable riparian habitat and adjacent upland habitat areas in a continuous wildlife corridor...."

Preservation of the Natural Character of the River Valley: This plan proposes that the natural character of the river valley maintained as it is now, and where that natural character has been diminished that it be restored...."

Conservation: There shall be a continuous riparian habitat corridor along the entire San Dieguito River and its tributary canyons...in order to permit wildlife to move freely ...and between water sources and habitat. The corridor shall have enough critical mass to ensure a fully functioning natural ecosystem." (emphasis ours)

"NCFUA Framework Plan EIR" (adopted by the City of San Diego 1992) [p. 24]: "The canyons which comprise... Gonzales and La Zanja Canyons... should be preserved...(for) both habitat potential and natural scenic character...."

157. These comments on the NCFUA Framework Plan regarding wildlife corridors and open space are noted. With respect to the alignment of SR-56, it is acknowledged that the middle portion of SR-56 was assumed to be located somewhere in Subarea III in both the NCFUA Framework Plan and the MSCP. Specifically, both the NCFUA Framework Plan EIR and the MSCP EIR show the Central Alignment for SR-56. Shifting SR-56 from an area of open space into the development area reduces the area available to accommodate all other planned uses including the Town Center and Transit Oriented Development. The proposed encroachment by each of the Subarea Plans into the MHPA will allow the implementation of the land uses prescribed in the Framework Plan in a manner that minimizes the loss of existing natural vegetation throughout the Subarea.

Response

Possibly the strongest argument for retaining a large part of Area 6 in the MHPA is found in the Framework Plan which, itself, brought approval of an "environmental tier" that reduced the open space of SA III much as this proposal does:

The Framework Plan's own final EIR found that the "reduced environmental tier proposed" would result in a conflict with the purpose and intent of adopted environmental plans or policies: for the area?":

"Open Space The intent of the Environmental Tier was to designate large areas for preserve status....The lands identified in the tier were the minimum needed to satisfy that intent. The (tier) was reduced in the course of the framework planning process....Areas for development were increased....

The Framework Plan (adopts) the proposed open space as part of the Environmental Tier. The reduction in the open space system significantly limits the potential for long-term preservation of the areas resources. [pp. 22-28]

The only way to substantially reduce land use impacts would be by "the adoption...of the Environmental Tier Alternative. This would provide the minimum lands necessary for continued viability of the area's natural resources." [pp. 22-28]

In short, the NCFUA Framework Plan and certified EIR found that the original "environmental tier" (1990-1) was "the minimum" needed to preserve habitat in the NCFUA, especially in SA III where the most intense development was proposed. When it was reduced further and approved in 1992, the "potential for long-term preservation of the area's resources" was "significantly" limited.

The ensuing MSCP adopted restored lines of preservation—the MHPA— almost identical to the first environmental tier, "the minimum lands necessary for continued viability." The DMEIR acknowledges this expansion:

"The MSCP requires changes to the NCFUA Framework Plan that result in an increase in the size of the Environmental Tier area through the deletion of development acreage. Most of the changes...are located in Pacific Highlands Ranch. Consequently, the MSCP...supersedes the Framework Plan and acknowledges the decreases in developable areas within the subarea by adoption of the MHPA boundaries." [p. 97]

However, importantly, the DMEIR inaccurately attributes the expansion into the MHPA in SA III solely to the need to "accommodate the realignment of SR-56 into the development area of Pacific Highlands Ranch." [p. 98] How can this be stated since all NCFUA and MSCP documents all assumed the middle portion of SR 56 somewhere in SA III? The additional expansion proposed is project development, as well, which must be attributed their share of the cause for expansion into the MHPA.

"The negative impacts associated with location of SR-56 within the MHPA are largely eliminated by the realignment into the development area...this expansion has been accepted by the numerous interested conservation and planning groups (including) Carmel Valley." [p. 98] This statement should be revised to say "numerous interested

158. The Final MEIR has been modified per this comment.

Response

conservation and planning groups were involved in pursuing the general concept of removing MHPA areas in SA III in order to preserve N 8A."

Deficiency of the DMEIR Regarding Analysis of Conflicts with City and JPA San Dieguito River Valley Land Use Goals:

The DMEIR finds no conflicts with the adopted goals for the Gonzales Canyon/San Dieguito River Valley in both the "San Dieguito River Regional Plan" or JPA-adopted goals in the park "Concept Plan: "Both Plan(s)...would accommodate the trail system goals in the FPA, especially in the area of Gonzales Canyon. Therefore, they are considered consistent with the goals and objectives of the FPA." [Table S-1]

- 159 How can the DMEIR consider only one—trails—of numerous SDRV goals in its analysis? The overriding conservation goals are not even considered in the summary of impacts. Doesn't this treat the SDRV as a mere trail system? How can the finding be made that the project would not "result in a conflict with the purpose and intent of any current planning process or adopted environmental plans or policies..." regarding the SDRV? This section needs to be corrected even in summary form to assess the effects on the river valley in the regional habitat system.

Council Policy 600-40 requires conformance with the City's environmentally sensitive lands actions and cannot be seen to be met with this DMEIR:

"Council Policy 600-40 (serves to) (2) ensure protection of environmental resources by preserving contiguous open space systems... and (3) ensure that adopted land use policies and objectives are considered..... which enables decision makers to determine the consistency of the plan with RPO and other adopted General plan and City Council policies and objectives." [p. 13]

Bridges Under Roadways In and Adjacent to SA III

The City of San Diego MSCP Subarea Plan "Preserve Guidelines" in the NCFUA include "C13: If funds become available, place a large culvert or bridge undercrossing for wildlife movement where El Camino Real crosses the outlet of Gonzales Canyon into the San Dieguito River." [p. 26] However, the DMEIR is inconsistent on whether bridges or culverts are proposed and ambiguous regarding actual provision:

"In order to facilitate wildlife movement, a bridge on Del Mar Heights Road would be proposed over the north-south MSCP open space corridor just west of its intersection with Carmel Valley Road." [p. 54] In the next statement, "As with Del Mar Heights Road, a bridge would be provided on Camino Santa Fe south of SR-56 to allow east-west wildlife movement within the MSCP corridor...."

Elsewhere, "Undercrossings (i.e., wildlife culverts) would be proposed beneath SR-56 and Del Mar Heights to facilitate wildlife movement."

The final MEIR should clarify exactly what is proposed and how it is to be funded.

159. The proposed Subarea III Plan's consistency with the San Dieguito River Valley Regional Open Space Park Concept Plan's major objectives is discussed below.

Gonzales and La Zanja Canyons open space corridors. Nearly half of both subarea plans are designated as MHPA open space. This open space preserves more than 1,260 acres of land, much of which is large areas of Tiers I, II, and III habitat. Within the preserved open space are wildlife corridors between the San Dieguito River valley to the north and the Los Peñasquitos Canyon Preserve to the south. Off-site linkages to the east provide access to Black Mountain Regional Park. Furthermore, approximately 100 acres of disturbed land within the MHPA for Pacific Highlands Ranch would be restored per a Master Revegetation Plan with appropriate upland and wetland habitats and a mitigation bank established. Much of this revegetation area consists of a manufactured wildlife corridor that would connect and provide for wildlife movement between Gonzales Canyon and McGonigle Canyon.

Development setback from ridgetops and sensitive architectural treatment. There are distant and limited views from the San Dieguito River Park into Pacific Highlands Ranch; however, these views are primarily of the already approved Del Mar Highlands Estates project portion of the subarea. Regardless of the proposed subarea plan and SR-56 alignment, the conversion of primarily rural agricultural lands with few access roads to the proposed urban uses under both plans would substantially alter the existing aesthetic character associated with the property. The unavoidable changes are considered significant and not mitigated impacts in the draft EIR.

Canyon overlooks and viewpoints will be provided along the community trail system, both within the right-of-way as well as in the open space corridors. Educational signage and benches would also be provided. These overlooks will be built by each developer, deeded to the City, as part of the trail system, and maintained by a Landscape Maintenance District or other financing entity.

Trail System. Pacific Highlands Ranch will include a subarea-wide trail system. The trail system would include about 15 miles of hiking, biking, and equestrian trails that connect with existing paths within the built neighborhoods. The trails would be located within the MHPA preserve as allowed by the adopted MSCP.

Downstream water quality would be protected by the construction of desilting basins in the subarea (see Figure 4D-3 of the draft EIR for alternative desilting basin locations) to reduce erosion and sedimentation during and after development. Monitoring and maintenance programs for these facilities would be prepared by future developers and after approval by the City, would be incorporated into the CC&Rs for the developments with these facilities in their common areas.

Response

conservation and planning groups were involved in pursuing the general concept of removing MHPA areas in SA III in order to preserve N 8A."

Deficiency of the DMEIR Regarding Analysis of Conflicts with City and JPA San Dieguito River Valley Land Use Goals:

The DMEIR finds no conflicts with the adopted goals for the Gonzales Canyon/San Dieguito River Valley in both the "San Dieguito River Regional Plan" or JPA-adopted goals in the park "Concept Plan: "Both Plan(s)...would accommodate the trail system goals in the FPA, especially in the area of Gonzales Canyon. Therefore, they are considered consistent with the goals and objectives of the FPA." [Table S-1]

How can the DMEIR consider only one—trails—of numerous SDRV goals in its analysis? The overriding conservation goals are not even considered in the summary of impacts. Doesn't this treat the SDRV as a mere trail system? How can the finding be made that the project would not "result in a conflict with the purpose and intent of any current planning process or adopted environmental plans or policies..." regarding the SDRV? This section needs to be corrected even in summary form to assess the effects on the river valley in the regional habitat system.

- 160 Council Policy 600-40 requires conformance with the City's environmentally sensitive lands actions and cannot be seen to be met with this DMEIR:

"Council Policy 600-40 (serves to) (2) ensure protection of environmental resources by preserving contiguous open space systems... and (3) ensure that adopted land use policies and objectives are considered..... which enables decision makers to determine the consistency of the plan with RPO and other adopted General plan and City Council policies and objectives." [p. 13]

Bridges Under Roadways In and Adjacent to SA III

- 161 The City of San Diego MSCP Subarea Plan "Preserve Guidelines" in the NCFUA include "C13: If funds become available, place a large culvert or bridge undercrossing for wildlife movement where El Camino Real crosses the outlet of Gonzales Canyon into the San Dieguito River." [p. 26] However, the DMEIR is inconsistent on whether bridges or culverts are proposed and ambiguous regarding actual provision:

"In order to facilitate wildlife movement, a bridge on Del Mar Heights Road would be proposed over the north-south MSCP open space corridor just west of its intersection with Carmel Valley Road." [p. 54] In the next statement, "As with Del Mar Heights Road, a bridge would be provided on Camino Santa Fe south of SR-56 to allow east-west wildlife movement within the MSCP corridor...."

Elsewhere, "Undercrossings (i.e., wildlife culverts) would be proposed beneath SR-56 and Del Mar Heights to facilitate wildlife movement."

The final MEIR should clarify exactly what is proposed and how it is to be funded.

160. A discussion of the project's consistency with Council Policy 600-40 is provided in the Land Use section of the MEIR.

161. See response 3 to the letter of comment from the USFWS/CDFG. The final MEIR has been revised to clarify the location of bridges and culverts within Subarea III.

Response

Neighborhood 10 Component

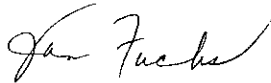
Discretionary actions include precise plan and community plan amendments to remove "approximately 8.1 acres of Tier II and Tier III habitats...from the MHPA within (N 10)" [p. 29] to add approximately 22 single-family units "and an increase in the number of multi-family units from 98-250." [S-17] all within Plan Area 10 of the neighborhood plan. This would add a total of 174 dwelling units to N 10; however, the "Traffic Circulation" analysis shows an additional 15 multi-family units to the 174, raising two questions:

162 (1) where are the additional 15 multi-family units shown?

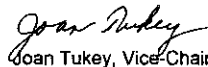
(2) what is the basis for reducing the trip generation for multi-family units from 8 to "6 trips/unit"? Is this realistic given the number of cars per resident in shared attached housing units? The DMEIR reasons this increase would produce "no net change in roadway impacts" because the additional units "would be offset by a reduction in units permitted in (N 8A), if development were permitted."

163 The community traffic circulation scenario at Carmel Mountain Road along N's 10, 8, 8A and the juncture of El Camino Real/I-5 are determined to be at LOS D or F at most intersections according to the final EIRs for N 10, Sorrento Valley, etc. Is the DMEIR saying this will remain the case, that "no net change" means these intersections will require the same queue times and a.m. and p.m. delays, even with the proposed revised phasing plan [p. 153]?

We appreciate the opportunity to comment and your attention to these issues.



Jan Fuchs, Chair



Joan Tukey, Vice-Chair

162. Trip generation rates used in the preparation of the traffic analysis were based on the city of San Diego trip generation summary. The trip generation rate for multi-family units with a density less than 20 dwelling units per acre is eight trips per unit. When the density for multi-family units is more than 20 dwelling units per acre a standard city rate of six trips per unit is used.

163. The phasing plan analysis for Carmel Valley Neighborhood 10 and 8A both assume access via Carmel Country Road with no westerly connection to Carmel Mountain Road. If dwelling units in 8A are transferred to Neighborhood 10, the same access route is assumed. Therefore, impacts to Carmel Mountain Road and El Camino Real to the west are avoided.

Response

**RANCHO BERNARDO COMMUNITY PLANNING BOARD
P.O. BOX 289008
SAN DIEGO, CA 92198-9008**

May 18, 1998

Ms. Eileen Lower
City of San Diego, Development Services
1222 First Avenue, M.S. 501
San Diego, CA 92101

RE: COMMENTS TO THE SUBAREA III PLAN DRAFT EIR

Dear Ms. Lower:

The Rancho Bernardo Community Planning Board has reviewed the draft EIR for the Subarea III Plan for the primary purpose of understanding the level of impact this project could have on the regional transportation system. As a result, the Board's concern regarding the adequacy and accuracy of the draft EIR is limited to the issue of traffic circulation.

164 Page 156 of the draft EIR states that needed improvements to I-5 and I-15 are the responsibility of "others," and although the project would result in significant cumulative impacts to these regional transportation facilities, mitigation is "outside the scope of the project." The Subarea III proposal is just one of seven development proposals located south of Del Dios Highway between I-5 and I-15 that have either recently been approved or are currently under consideration. The various EIRs prepared for these projects all conclude that mitigation for significant cumulative impacts to the freeways is beyond the scope of the individual projects. According to the Subarea I draft EIR, the total trip generation from these projects is 342,409 trips (Table 4B-7). If the individual projects being developed in the North City area are not responsible for mitigating their fair share of impacts to the regional transportation system, then who are the "others" that are responsible for mitigating the impacts from 342,409 additional trips within the area? When all of these projects are considered as a whole, it is obvious that the proposed developments will directly impact I-5 and I-15, yet none of these projects appear to have any responsibility for mitigating this impact.

The purpose of the cumulative impacts section of an EIR should not be to simply identify the cumulative impacts. The analysis should also recommend appropriate measures for minimizing these impacts, and identifying those parties responsible for implementing the mitigation measures.

Thank you for the opportunity to comment on this draft EIR.

Sincerely,



Richard Belzer
Planning Board Chair

164. Specific improvements to I-5 and I-15 are shown on Table 24 of the traffic report. Fair-share contributions are required for SR-56, I-5/SR-56 northbound connectors, and I-5/SR-56 improvements. In addition, regional improvements of I-5 and I-15 are required before buildout of Subarea III (Table 21 of the traffic report). Also, Subarea IV and 4S Ranch all have phased improvements for I-15.

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Robert J. Green
Building Commissioner

Response

May 12, 1998

Eileen Lower, Environmental Planner
City of San Diego
Development Services
Land Development Review Division
1222 First Avenue, Mail Station 501
San Diego, CA 92101

Subject: Comments on the Draft Master Environmental Impact Report for Pacific Highlands
Ranch (FUA Subarea III) Subarea Plan

Dear Ms. Lower:

Thank-you for the opportunity to review and comment on the Draft MEIR for Pacific Highlands Ranch (FUA Subarea III) Subarea Plan. The Association is concerned about the potential impacts of the proposed development on traffic within the Covenant area.

1. The Association has concluded that the traffic analysis is inadequate and/or in error with respect to the following road segments and requests that further analysis of these segments be undertaken:
 - 165 • El Apajo - Via de Santa Fe to San Dieguito Rd. This segment of road which exists as a 2-lane Collector with a LOS of "D" is projected to increase in ADTs from 15,000 to 15,400 and operate at a LOS of "E." This is a significant increase in ADTs which should be addressed in further detail and mitigated.
 - 166 • El Camino Real - San Dieguito Rd to Via de la Valle. This 2-lane Collector segment of road is stated to currently operate at a LOS of "F" accommodating 14,900 ADTs. According to Table 4B-9 of the MEIR, "Subarea Plan 1 Future Street Segments Level of Service," this segment is projected to increase to 28,900 ADTs and remain as a Collector street operating at an elevated and extremely unacceptable LOS of "F." Table 4B-14

165. See response 144 to the Fairbanks Ranch Association letter of comment.

166. Table 9, Table 12, and Table 15 of the traffic study have been revised to show El Camino Real from San Andres Drive to Via de la Valle as a four-lane major. This is consistent with the transportation improvement summary Table 24 of the traffic study. The Final MEIR has been updated to reflect these traffic study changes.

Response

- "Transportation Improvement Summary," however, states that El Camino Real between San Andres Drive and Via de la Valle is to be improved to four lanes. This contradiction should be addressed. In addition, the projected increase in ADTs along this segment of road is of great concern to the Association and should be addressed in further detail and mitigated appropriately.
- 167 • Via de Santa Fe -Via de la Valle to El Apajo. This segment of road which exists as a 2-lane Collector with a LOS of "C" is projected to increase in ADTs from 6,900 to 12,900 and operate at a LOS of "F." This increase in ADTs is not addressed at all in the MEIR. It needs to be addressed and mitigated.
- 168 • Via de la Valle - El Camino Real to Via de Santa Fe. This segment of road which exists as a 2-lane Collector with a LOS of "F" and an estimated 26,300 ADTs is projected to decrease in ADTs to 21,900. It is also stated in Table 4B-9 that this segment is to be improved to a 4-lane Major road with a LOS of "C." The Association adamantly opposes such an improvement which would destroy the rural, narrow character of their historic roadways. Association staff, however, were informed by City staff that this segment of Via de la Valle should not be identified as proposed for improvement to four lanes and would actually remain a 2-lane Collector road with a LOS of "F." Table 4B-9 needs to be corrected appropriately. Furthermore, although the future ADTs for this segment of road is projected to decrease from the existing count (as a result of the construction of SR56 and other proposed roads within the region), the segment will continue to operate at a LOS of "F." According to City staff, the projected amount of traffic attributable to the Pacific Highlands Ranch project on this segment of road will be approximately 151 ADTs and does not constitute a "significant impact." However, any increase in traffic on a road which already operates at a LOS of "F" is considered significant by the Association. The Association requests that the increases in traffic on this segment of road be addressed in more detail and mitigated.
- 169 • El Camino Real from Via de la Valle to Linea de Cielo. There is no analysis of this road segment included in the MEIR. The Association is concerned that this segment of roadway will be negatively impacted by the proposed development. It is already a highly traveled road.
2. Make sure all of the FUA development proposals and adjacent development proposals within the unincorporated County areas are included in traffic analysis. While a number of the on-going developments in the region were mentioned in the MEIR, the Association feels it is extremely important to include all current proposals and the most up-to-date information available for the traffic analysis. The Association has reviewed SANDAG's population estimates for the San Dieguito Planning Area and the larger mid-North County region and they appear to be seriously flawed (see attachment). The Association questions the accuracy of ADT projections and traffic analysis based on these SANDAG population estimates. The ADT projections for the mid-North County area need to be recalculated based on existing entitlements so that reasonably accurate cumulative impacts can be assessed. In reviewing the MEIR, it was noted in particular that there was no mention of the on-going processing of Phase II of Black Mountain Ranch (Subarea I) which is to have 4,279 dwelling units and 650,000 sq. ft. of retail, service, office and employment centers. The Association is also aware of the on-going processing of the proposed Rancho Santa Fe Driving Range (which
167. As shown on Table 20 of the traffic study the project will contribute only 342 trips of the projected ADT. See also response 1 to Fairbanks Ranch Association letter of comment.
168. Table 9, Table 12, and Table 15 of the traffic study have been revised to show Via de la Valle from El Camino Real to Via de Santa Fe as a two-lane collector. Comment noted regarding the significance of the project impact. The analysis was completed according to City procedures. Mitigation is tied to significant impacts. No significant impacts to the referenced roadway were identified; therefore, no mitigation is required.
169. The project study area was determined by both the City of San Diego and CMP guidelines. Based on the guidelines El Camino Real from Via de la Valle to Linea de Cielo was not included in the project study area. A review of the forecast project distribution showed only 33 project related trips are projected on this segment. Therefore, mitigation discussion is not warranted.
170. The computer travel forecast prepared for the traffic analysis does include the requested projects. The travel forecasts assumed Phase II of Black Mountain Ranch along with Subarea's IV and V; and the county projects 4S Ranch and Santa Fe Valley Projects. Morgan Run and the driving range projects should also address cumulative traffic impacts and mitigation.

Response

includes a driving range and a roller hockey complex) and the MUP modification for expansion of the Morgan Run Resort and Club. Traffic impacts of all these developments, if approved, will be enormous. EIRs and the review process for each of these individual projects should address the cumulative impacts of all these projects in order to provide traffic projections that are accurate.

- 171 3. The traffic analysis identifies Rancho Santa Fe as one of four county communities that will be "potentially affected by project traffic." The following three road segments in the county are discussed and analyzed:
- Camino Ruiz south of San Dieguito Road,
 - El Apajo to Rancho Diegueno or San Dieguito east of El Camino Real, and
 - Rancho Santa Fe Farms north of Carmel Valley Road.

The MEIR then summarizes that "Most of the traffic [in the four identified county communities] represents trips that originate in county areas and have destinations within the project area such as persons living in the county who visit friends in the project area. Because the resulting LOS for all three segments will be LOS D or better, this is not considered a significant effect" (p. 140, MEIR).

- 172 Given the above identified road segments and associated comments, this section of the MEIR is inadequate. It is unclear why the county portions of Via de la Valle between El Camino Real and Via de Santa Fe and Via De Santa Fe between Via de la Valle and El Apajo as well as the other county segments stated above are not identified and/or discussed in greater detail in the "County Areas" impacts section (DRAFT MEIR, p. 140). The identified segments of Via de la Valle and Via de Santa Fe are already operating at a LOS of "F." Any impact to these road segments is thus significant. Analysis of impacts on El Camino Real between Via de la Valle to Linea de Cielo also should be discussed in this section.
4. The Association requests that the proposed land uses be carefully reviewed with respect to conformance with that which was approved in the Framework Plan for Subarea III and with respect to the consistency of the proposed uses within various sections of the MEIR. The following errors and issues of concerns were specifically identified:
- The MEIR states that 20 acres of land are to be used for "Employment Centers." There seems to be no discussion of this use in the Framework Plan.
 - The proposed "Employment Centers" do not seem to be included in Table 4B-8 "Proposed Project Trip Generation."
 - Table 4B-8 identifies that 5501 multi-family units are to be developed under the Subarea Plan I heading.
- 173 5. Based on the lack of an existing or planned regional mid-North County highway network, the Association feels that no development within Subarea III should occur until all proposed circulation elements and required transportation mitigation measures associated with the proposed project are completed. In particular, the Association is opposed to the approval of large-scale developments in the mid-North County area until SR56 is completed and until a northbound ramp from SR56 onto Interstate 5 is planned, funded and completely constructed.

171. See responses 166-168 above.

172. The proposed Employment Center land use designation, while not specifically described in the Framework Plan is was developed for Subarea III in conjunction with the project applicant and City staff to provide employment opportunities in close proximity to the residences. The trip generation for the Employment Center is within the "Office" use shown in Table 4B-8 and the table has been revised to correct the number of multi-family units for Subarea Plan I.

173. The planned regional highway network that presently exists is reflected in the city, the City Framework Plan, and County General Plan circulation elements and amendments thereto. Projects are phased as the circulation elements are implemented. It would be improper as public policy to halt all development until the plans are fully implemented because the projects provide both funds and right-of-way to implement the infrastructure. Subarea III is carefully phased so that traffic impacts are avoided or mitigated. The SR-56/I-5 north direct connectors are not needed before development in Subarea III because the current ramps project to and from the south, which is about to be opened by Caltrans, will add significant new capacity to the system thus diverting traffic from the existing Carmel Valley Road interchange and allowing new Subarea III traffic to be accommodated.

Response

It is stated on page 143 of the DRAFT MEIR that State Transportation Implementation Plan (STIP) funding, design and award of a construction contract for the I-5/SR56 north direct connectors are required in order to begin Phase F of outlined Subarea III Phasing Plan. The actual completion of I-5/SR56 north direct connectors are not required until 2,150 of the total approximately 5,000 dwelling units are allowed to be constructed. The beginning of Phase F would allow for the construction of 1,500 dwelling units and 650 units are provided for previously in Phase D. The remaining build-out of Subarea III is proposed to be constructed after the I-5/SR56 north direct connectors are opened to traffic. Traffic congestion in the mid-North County area is already problematic and steadily worsening. Phasing plans for large-scale developments in this region should provide that adequate vehicular circulation systems are in place and operational before the construction of new dwelling units and other traffic generating land uses are permitted. The proposed phasing plan for Pacific Highlands Ranch does not.

- 173a In summary, the Association requests that the Draft MEIR be carefully reviewed for consistency and adequacy with respect to traffic and circulation issues. Further, the Association requests that the EIR provide a more thorough analysis of the projected traffic on the roads which are adjacent to or within the Covenant area and are impacted to any significant (meaning change in LOS or significant increase in current volume) extent by the proposed development. The Association is extremely concerned about the continuous permitting of development within the mid-North County region without the prior completion of adequate traffic and circulation mitigations. It is hoped that the City and other permitting agencies will work to ensure that adequate traffic analysis and mitigation measures which protect the narrow, winding and heavily-landscaped character of Rancho Santa Fe's rural roadways are undertaken before this and any future large-scale developments are approved.

Please keep us informed of staff recommendations and hearing dates.

The Association thanks you for your assistance, cooperation and for providing us with the opportunity to participate in this process.

Sincerely,



Pete Smith, Association Manager

Attachment: "Development Projects within the Rancho Santa Fe Region," (population and development estimate tables prepared by the Rancho Santa Fe Association).

cc: Supervisor Pam Slater
Lois Jones, Chair, San Dieguito Planning Group

- 173a The traffic analysis presented traffic technical report and summarized in the body of the MEIR provides a thorough discussion of the proposed project's cumulative impacts on projected traffic volumes on roads in the subregion. The final traffic analysis for the Subarea III Plan is included as an appendix to the final MEIR.

Development Projects within the Rancho Santa Fe Region

Disclaimer: These tables contain data from development projects in various stages of the planning and approval process; all data is approximate and subject to jurisdictional modification.



CITY OF SAN DIEGO

Project Name	Total Acreage	No. of Residential Dwelling Units	Other Land Uses	Total Estimated ADT's	Total Estimated Population
Black Mountain Ranch II - Phase I (FUA - Subarea I)	3,777	1,119	<ul style="list-style-type: none"> • 2 Schools • 2 Churches • 2 Golf Courses • Community Park 	14,402	3,301
Source: <i>Black Mountain Ranch Revised TM</i>					
Black Mountain Ranch II - Phase II (FUA - Subarea I)	900	4,281	<ul style="list-style-type: none"> • Retail & Services (135,000 sq. ft.) • Office (65,000 sq. ft.) • Employment Centers (450,000 sq. ft.) 	60,310	12,629
Source: <i>Framework Plan</i> Calculations for Subareas 1A and 1B after subtracting <i>Black Mountain Ranch Revised TM</i> Phase I proposed uses.					
Subarea II - FUA	830	230	NONE	2,300	679
Source: <i>Framework Plan</i>					
Subarea III - FUA (excluding Sea Breeze Farms)	2,568	5,016 <ul style="list-style-type: none"> • Single-Family (3,243) • Multi-Family (1,773) 	<ul style="list-style-type: none"> • Park (30 acres) • Elementary School (20 acres) • High Schools (48 acres) • Private High School (50 acres) • Neighborhood Commercial (150 KSF) • Office (150 KSF + 14 acres) • Civic (4 acres) 	80,689	14,797
Source: DRAFT Master Environmental Impact Report for Pacific Highlands Ranch (Subarea III), dated April 3, 1998.					
Sea Breeze Farms (annexed into Carmel Valley Community Plan)	72	300 <ul style="list-style-type: none"> • Single Family (250) • Multi Family (50) 	NONE	3,060	885
Source: <i>4-S Ranch Draft EIR</i>					
Torrey Highlands (FUA - Subarea IV)	1,134	2,600	<ul style="list-style-type: none"> • Employment Center • Joint Operations Center • Institutional • Commercial • Schools • Parks 	57,152	7,670
Source: <i>Torrey Highlands Subarea IV EIR</i>					

Development Projects within the Rancho Santa Fe Region

Disclaimer: These tables contain data from development projects in various stages of the planning and approval process; all data is approximate and subject to jurisdictional modification.

Torrey Highlands FUA - Subarea IV)	387	93	• Lands deeded to City for school	2,130	274
Source: Torrey Highlands Subarea IV EIR					
Delmar Mesa Specific Plan FUA - Subarea V)	1,802 (130 acres of which are outside of Subarea V)	688	• Resort • Golf course • School • Park	10,570	2,030
Source: Delmar Mesa-Subarea V Draft EIR and Bougainvillea Final EIR					
Bougainvillea FUA - Subarea V)	240	134	• Resort • Golf course	4,340	395
Source: Bougainvillea Final EIR					
Area Total	11,710	14,461		234,953	42,660

CITY OF ENCINITAS

Project Name	Total Acreage	No. of Residential Dwelling Units	Other Land Uses	Total Estimated ADT's	Total Estimated Population
Knights Bridge - Barrett	148	58	NONE	580	151
Source: City of Encinitas Parcel Map; Personal Communication with City of Encinitas Planning Staff, 1-19-98.					
Wildflower Estates	73	31	NONE	310	81
Source: City of Encinitas Parcel Map; Personal Communication with City of Encinitas Planning Staff, 1-19-98.					
Double L Ranch	97	36	NONE	360	94
Source: City of Encinitas Parcel Map; Personal Communication with City of Encinitas Planning Staff, 1-19-98.					
Area Total	318	125	NONE	1,250	326

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Page 2

Response

Development Projects within the Rancho Santa Fe Region

Disclaimer: These tables contain data from development projects in various stages of the planning and approval process; all data is approximate and subject to jurisdictional modification.

CITY OF CARLSBAD

Project Name	Total Acreage	No. of Residential Dwelling Units	Other Land Uses	Total Estimated ADT's	Total Estimated Population
The Villages of La Costa (Approved Southwest Area)	529	1,076 • Single-Family	• Jr. High School (27.40 acres) • Elementary School (13.30 acres) • Church (7.60 acre) • Open Space/Recreation • RV Storage Pkg Facility	12,882	2,690
Source: <i>The Villages of La Costa Master Plan</i> ; Personal Communication with Fred Arbuckle.					
The Villages of La Costa (Proposed Southeast Area)	1,121	1,132	?	11,320	2,830
Source: Personal Communication, City of Carlsbad Planning Staff, 11-5-97.					
The Villages of La Costa (Proposed Northwest Area)	744	1,149	?	11,490	2,873
Source: Personal Communication, City of Carlsbad Planning Staff, 11-5-97.					
Green Valley	281	400 max. • Single-Family	• Community Commercial/Retail • Open Space (18.3 acres total)	16,810	1,000
Source: <i>Green Valley Master Plan</i> and Personal Communication; City of Carlsbad Planning Staff, 11-5-97 & 1-19-98.					
Shelley Tract	200	249 • Single-Family	• Elementary School (Existing) • Open Space (Approx. 10 acres total)	2,490	623
Source: <i>Rancho Cabrillo Master Plan</i> ; Personal Communication, City of Carlsbad Planning Staff 11-5-97 & 1-19-98.					
Rancho Cabrillo	405	1,816 • Single Family (1,067) • Multi-Family (749)	• School (17.1 acres) • Community Facilities (4.5 acres) • Open Space (252.2 acres)	17,688	4,540
Source: <i>Rancho Cabrillo Master Plan</i> ; Personal Communication, City of Carlsbad Planning Staff, 11-5-97 & 1-19-98.					
Area Total	3,280	5,822		72,680	14,556

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Page 3

Response

Development Projects within the Rancho Santa Fe Region

Disclaimer: These tables contain data from development projects in various stages of the planning and approval process; all data is approximate and subject to jurisdictional modification.

CITY OF SAN MARCOS

Project Name	Total Acreage	No. of Residential Dwelling Units	Other Land Uses	Total Estimated ADT's	Total Estimated Population
San Elijo Ranch	1,961	3,321 <ul style="list-style-type: none"> • Single-Family (2,135) • Estate (135) • Multi-Family (272) • Cluster/Attached (460) • Patio Home (319) 	<ul style="list-style-type: none"> • Neighborhood Comm. (13 acres) • Elementary Schools (26 acres) • Institutional (6 acres) • Regional Rec. Park (206 acres) • Neighborhood Park (20 acres) • Open Space (777 acres) • Water Reservoir, Sheriff Substation, Fire Station (minimal acreage) 	46,264	10,029
Source: San Elijo Ranch Specific Plan Amendment, November 1, 1995.					
University Commons	416	1,704 <ul style="list-style-type: none"> • Single-Family (490) • Multi-Family (1,214) 	<ul style="list-style-type: none"> • Neighborhood Comm. (13.6 acres) • Elementary School (12.8 acres) • Park (24 acres) • Open Space (71.5 acres) 	25,020	5,146
Source: University Commons Specific Plan, September 25, 1991, Revised November 11, 1991.					
Area Total	2,377	5,025		71,284	15,175

Development Projects within the Rancho Santa Fe Region

Disclaimer: These tables contain data from development projects in various stages of the planning and approval process; all data is approximate and subject to jurisdictional modification.

COUNTY OF SAN DIEGO

Project Name	Total Acreage	No. of Residential Dwelling Units	Other Land Uses	Total Estimated ADT's	Total Estimated Population
4-S Ranch	3,525	4,965	<ul style="list-style-type: none"> Schools Parks Office Community Facility Commercial Churches Fire Station Transit 	82,860	16,647
Source: 4-S Ranch Draft EIR					
Christopherhill (part of 4S Ranch SPA)	634	400 <ul style="list-style-type: none"> Single-Family (300) Multi-Family (100) 	Commercial (4 Acres)	5,800	1,180
Source: 4-S Ranch Draft EIR					
Rancho Cielo Specific Plan	2,815	770	Neighborhood Commercial & Retail (50,000 sq. ft.)	8,920	2,272
Source: Personal Conversation with Dave Dacus, Rancho Cielo, 10-2-97					
Cielo at Rancho Santa Fe (part of Rancho Cielo SPA)	1,736	527	Neighborhood Commercial & Retail (up to 50,000 sq. ft.)	6,658	1,555
Source: Personal Conversation with Dave Dacus, Rancho Cielo, 10-2-97					
Santa Fe Creek (part of Rancho Cielo SPA)	195	45 (5 of 45 are w/in Rancho Cielo SPA)	NONE	450	1,328
Source: Personal Conversation with Dave Dacus, Rancho Cielo, 10-2-97					

Development Projects within the Rancho Santa Fe Region

Disclaimer: These tables contain data from development projects in various stages of the planning and approval process; all data is approximate and subject to jurisdictional modification.

Santa Fe Valley Specific Plan	3,163	1,200 • Single Family • Multi Family	<ul style="list-style-type: none"> • Golf Course (18 holes) • Executive Golf Course (9 holes) • Resort hotel (250 rooms/26 acres) • Private Equestrian Facility (?) • Congregate Care Facility (7 acres) • Neighborhood Commercial (12 acres) • Elementary School (1-7 acres) • Fire Station (8 acres) • Sewage Treatment Plant (2.7 acres) • Park 	21,255	3,540
Source: 4-S Ranch Draft EIR, Santa Fe Valley Specific Plan Draft EIR.					
Santa Fe Hills	40	15	NONE	150	44
Source: 4-S Ranch Draft EIR					
Horizon Country Club	446	250	• Private Golf Course	3,200	738
Source: 4-S Ranch Draft EIR.					
Area Total	10,623	7,600		122,185	24,421

	Total Acreage	No. of Residential Dwelling Units	Other Land Uses	Total Estimated ADT's	Total Estimated Population
Regional Total	28,308	32,908		501,102	96,812

Notes:

- When not provided in source documents cited above, ADT calculations were estimated by using the "(Not So) Brief Guide of Vehicular Traffic Generation Rates for the San Diego Region", San Diego Association of Governments, December 1996.
- Total population estimates were calculated using the January 1, 1997 persons per household calculation factors provided in "Table 15: Persons per Household By Jurisdiction", SANDAG Info, SANDAG/Source Point, September- October 1997, p.18.
- Not included in these estimates are the planned and potential minor subdivisions in the region that will increase these estimates by some unknown but cumulatively significant factor.
- Prepared By: Rancho Santa Fe Association, January 1998.
- Edited Date: Edited to reflect updated numbers and uses for Subarea III - Pacific Highlands Ranch on April 9, 1998.

Response

SANTA FE SUR
HOMEOWNERS ASSOCIATION
P.O.Box 9030-309
Carlsbad, California 92009
(760)631-3990 • (760)631-3942 (fax)

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MAY 18 1998

May 15, 1998

City of San Diego
Development Services Business Center
Land Development Review Division
1222 First Avenue, Mail Station 501
San Diego, CA 92101

Attention: Eileen Lower, Environmental Planner

Subject: Response to Draft Master Environmental Impact Report
(MEIR) Subarea III Plan in the North City Future
Urbanizing Area (NCFUA) (LDR No. 96-7918)

Dear Ms. Lower:

Santa Fe Sur is a residential community which borders the northeast area of Subarea III. We are very concerned with traffic and density issues involved in the Draft MEIR which directly affect our community. Rancho Santa Fe Farms Road runs right through our community. We are submitting the following comments in hopes that they will be incorporated in the analysis of the Final MEIR.

As mentioned above, Rancho Santa Fe Farms Road runs right through our community. It is a two lane residential street. There are no sidewalks on Rancho Santa Fe Farms Road. A number of the driveways in our community empty out directly into Rancho Santa Fe Farms Road. Four streets in our community require residents to turn on Rancho Santa Fe Farms Road. In figures 4B-1 and 4B-2, the Draft MEIR shows the average daily traffic volume on Rancho Santa Fe Farms Road is projected to increase approximately 200% as a result of the subarea plan; from the current 2,000 vehicles to 5900 vehicles. This street is crossed by adults, children, horses and their riders, dogs, and a variety of wildlife. We have already had a number of serious accidents on Rancho Santa Fe Farms Road, and the claim on page 140 of the Draft MEIR that the increase in traffic is "not considered a significant effect" defies reality and reason.

174

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There is no question that the Subarea III plan as set forth in the Draft MEIR does not adequately address the impact of increased traffic on Rancho Santa Fe Farms

174. See response 70 to letter from County of San Diego (Doug Isbell)..

175. See response 70 to letter from County of San Diego (Doug Isbell).

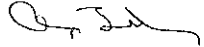
Response

Page 2

Road, and the impact on our community and the surrounding communities with respect to public safety concerns, noise, and the nature of the community.

We hope that our concerns will be seriously considered and addressed in the Final Subarea III Plan MEIR. We would appreciate a copy of the Final MEIR sent to the above address as soon as it is available for public review. Thank you for your cooperation in this matter.

Sincerely,



Alex Landon
President, Santa Fe Sur Homeowners Association

PR-88

Response

May 16, 1998

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MAY 16 1998

ENVIRONMENTAL PLANNING
CITY OF SAN DIEGO

To: Eileen Lower
Environmental Planner

From: Lloyd Sappington, President
Rancho Glens Estates Homeowners Association

RE: Response to Draft Environmental Impact Report
Pacific Highlands Ranch (Subarea III) Subarea Plan (NCFUA)
LDR No. 96-7918 SCH No. 97111077

- 176 Subarea Plan 1 (SR-56 Alignment "F") and Subarea Plan 2 (SR-56 Alignment "D") are completely unacceptable to Rancho Glens Estates since they are based on freeway alignments north of Santa Monica Ridge. Such alignments violate the City of San Diego's 1992 Framework Plan for the North City Future Urbanizing Area, adopted as part of the City's General Plan. They are devastating to those communities already existing in Subarea III and will be devastating to any communities developed here in the future. Compared with the alignments proposed south of the Santa Monica Ridge, these northern routes are longer, translating into more commuter miles traveled and more air pollution. They are less direct and will be more costly to build. They are seriously flawed from a land use perspective. Moreover, if built, they will forever have a deleterious effect on the health, safety, and welfare of the people living in NCFUA.
- 177 By contrast, the Central Alignment "would avoid all built land uses," "would not result in significant community character impacts," and "would be consistent with the general land use plan for Subarea III of the Framework Plan" (*Draft Revised Environmental Impact Report, LDR NO. 95-0099, SCH NO. 96031039, pp. ES-17-18*).
- 178 As to the process employed by the applicant in developing these plans for Pacific Highlands Ranch, Rancho Glens Estates was not consulted nor were we considered. The applicant did not meet with Rancho Glens Estates to share its plans until May 13, 1998. As a result, it is impossible for us to

176. Comments acknowledged. It should be noted that the Central SR-56 alignment alternative would result in significant unmitigated impacts in several environmental issue areas, including land use, MSCP consistency, landform alternation, visual quality, and biological resources.
177. Comments acknowledged. It should be noted that the Central SR-56 alignment alternative would result in significant unmitigated impacts in several environmental issue areas, including land use, MSCP consistency, landform alternation, visual quality, and biological resources.
178. As required, the Pacific Highlands Ranch Land Use Plan reflects the guiding principals of the Adopted Framework Plan. The Plan includes an open space system which is consistent with both the Framework Plan and the MHPA. The Plan includes a mixed-use community core, located at the center of the project and a variety of housing types as dictated by the Framework Plan. The Plan also includes four different land plans reflecting the various SR-56 alternative alignments. Representatives of the Rancho Glens Estates attended and provided comments at several Carmel Valley community workshops during the months of April and May, a Planning Commission workshop on April 30, 1998, and also met with Pardee Construction Company representatives on February 9, 1998, and May 13, 1998.

Response

make a thorough and studied response by the May 18, 1998 deadline. The applicant's approach shows total disregard for the concerns of Rancho Glens Estates and the impact these plans would have on our community. It is very clear that this process is broken, and we intend to hold the City accountable for any failure to ensure that Rancho Glens Estates receives proper opportunity to review the applicant's plans and a realistic timeframe in which to comment on their impact on our community.

- 179 In addition to placing a freeway at our front door, the Pacific Highlands Ranch Subarea III plans surround Rancho Glens with density and use that is inconsistent with our standing as a 1 per 4 development of estate homes. Furthermore, the plans represent the applicant's intention to actually enter our community, a Planned Residential Development, with walking, biking, and horseback riding trails.

In terms of the plans' suitability for the development of Subarea III, Rancho Glens Estates has the following concerns:

- 180 1. The Pacific Highlands Ranch Subarea Plan violates the City's General Plan goals of retaining premium farm land and of developing a transportation system that is consistent with the types of land uses that it serves.
- 181 2. The PHRS Plan violates the City's NCFUA Framework Plan's guiding principle of designing a transportation system that will not result in severe impacts to adjoining communities. Traffic generated by building out the PHRS Plan would result in immediate and cumulative impacts on the I-5/805 and I-15 freeways as well as on surface streets within and outside of the subarea.

Given that the City of San Diego is already experiencing enormous traffic problems on these two north/south freeways, it does not make sense to build out the subarea, with all of the additional traffic that, that build-out will generate, without first solving the traffic problems we are experiencing today. To do so would place an unnecessary burden on the citizens of this city.

Moreover, the density increase proposed in the Pacific Highlands Ranch Subarea Plan is simply inappropriate for this area. The applicant for Pacific Highlands Ranch intends to build out Subarea III with over 5,000 dwelling

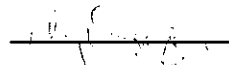
179. Under both Subarea Plans, the proposed land uses adjacent to the Rancho Glens Estates residential community (i.e., MHPA open space on the south, west, and east with residential to the north) would not be considered incompatible with the site. Rancho Glens Estates was developed utilizing the cluster option specified by the City of San Diego's Municipal Code. This option allows development of one unit per four acres in the AI-10 zone of the Future Urbanizing area, with the permitted units clustered. The prior existence of Rancho Glens Estates does not preclude development of the surrounding areas at the higher densities that could occur with a phase shift. The comment on the proposed Subarea Plan trail and the existing Rancho Glens Estates PRD is acknowledged.
180. The effect of the proposed Subarea Plans for Pacific Highlands Ranch with respect to agricultural lands is acknowledged in the MEIR as a significant unmitigated direct and cumulative effect of the project.
181. The MEIR addresses cumulative traffic impacts and acknowledges that the project would contribute to cumulative traffic impacts in the region.

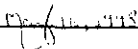
Response

- 182 units, nearly 10 times the density proposed in the concept plans for Subarea III that can be implemented without a phase shift. Those plans call for one unit per four acres on Pardee-owned land, with one unit per ten acres on the other ownerships. These plans would result in 551 dwelling units, a golf course, driving range, clubhouse, and school park. Rancho Glens Estates encourages the applicant to consider a build out of this character instead.

Finally, Rancho Glens Estates is a member of San Diegans for Responsible Freeway Planning. We encourage the City to consider the remarks from this organization as well as those we have made here in evaluating the plans for Subarea III.

We thank you for this opportunity to comment.


Lloyd Sappington


Date

182. This comment on the appropriateness of the proposed residential density for Pacific Highlands Ranch by the Association is noted. A phase shift would be required for the implementation of the proposed project.



San Dieguito River Valley
Regional Open Space Park
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JOINT POWERS AUTHORITY
BOARD OF DIRECTORS

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Dr. Philip Pryde
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Citizens Advisory Committee

May 18, 1998

Ms. Eileen Lower
City of San Diego, Development Services
202 C Street, M.S. 501
San Diego, CA 92101

SUBJECT: Comments to the Pacific Highlands Ranch (Subarea III) Subarea
Plan Draft Master Environmental Impact Report

Dear Ms. Lower:

The San Dieguito River Park Joint Powers Authority (JPA) appreciates the opportunity to review and comment on the adequacy and accuracy of the draft Master EIR for the Subarea III Plan. The JPA Board of Directors considered the Subarea III proposal at its meeting of May 15, 1998 at which time the following comments were approved:

- 183 *Of particular concern is the modification being proposed to the area referred to as Area 6 on the attached map. The deletion of approximately 44 acres of proposed open space from the MHPA at this location would change the function of this area from that of a "refugia" for wildlife to a more narrow corridor. To ensure the viability of the open space in Gonzales Canyon, the original MHPA boundary should be maintained in this area.*

2. *The trails illustrated in the Subarea Plan include key linkages between the San Dieguito River Park and Los Penasquitos Canyon. Without the key linkages the proposed network of trails will not work,*

Response

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MAY 13 1998

ENVIRONMENTAL ANALYSIS
SECTION

183. Comment noted. The viability of Gonzales Canyon will be maintained. It will have a minimum width of 1,000 feet and will still include a "refugium" of approximately 140 acres. The City of San Diego has found, and the USFWS and CDFG have concurred, on this point, and on the finding that the MHPA will be functionally equivalent to that originally adopted. See letter of comment from CDFG and USFWS above.

PR-92

Response

184 *therefore, it is essential that these key linkages be retained in the plan and that measures for implementing the linkages be approved as part of the Development Agreement. A critical trail segment crosses the previously approved Del Mar Highlands Estates project. That applicant did not object to inclusion of the trail in that project and the JPA Board requested that City to make the trail segment a condition of the project, but it was not required by the City at the time the project was approved. Because this linkage is shown on the Subarea Plan trails map, it is essential that the subarea Plan text include language that assures the financing for and construction of the trail segment that extends through the previously approved Del Mar Highlands Estates project.*

The San Dieguito River Park JPA Board of Directors also requests that the San Diego City Council incorporate the following conditions into the Subarea Plan and proposed Development Agreement for Subarea III:

- 185 *1. As was required of the Del Mar Highlands Estates project, this project and all future development proposals located north of SR-56 shall contribute to the cost of constructing a wildlife undercrossing at El Camino Real in order to accommodate wildlife movement between Gonzales Canyon and the western river valley.*
- 186 *2. Permanent detention basins shall be provided within the subarea in order to minimize impacts to downstream water quality, and these facilities shall be constructed prior to the issuance of building permits.*
- 187 *3. The area of habitat restoration that the applicant is required to complete shall be expanded to include the "disked/agricultural" areas within Gonzales Canyon and located immediately to the south of MHPA Adjustment Area 6. The additional acreage could be included in the mitigation bank to be operated by the developer.*
- 188 *4. In order to ensure the timely completion of the proposed trail system, all of the trails illustrated in the Subarea Plan shall be constructed by the developer in accordance with the City Parks and Recreation Department standards and shall be completed prior to dedication of open space to the City.*

The JPA action presented above forms the basis for the staff comments to the draft Master EIR (dMEIR), however, it should be noted that the staff comments provided below have not been reviewed or approved by the JPA Board of Directors.

Land Use

- 189 1. Page 78 - The dMEIR incorrectly states that "the City of San Diego has not yet incorporated any part of the concept plan into City planning documents, although several Framework Plan policies address the park." Significant elements of the San Dieguito River Park Concept Plan were incorporated into the San Pasqual Valley Plan, which was adopted by the San Diego City Council in 1995. In addition, the North City Future Urbanizing Area Framework Plan incorporates far more of the Park concepts, as presented in the Concept Plan, than a few

184. The Del Mar Highlands Estates project was approved in 1997 with associated conditions and plans. The adoption of the Pacific Highlands Ranch Subarea Plan will not modify conditions of the previously approved Del Mar Heights project, including the trail requirements. However, the multi-use trail located within Gonzales Canyon linking portions of the San Dieguito River Park is included within the Pacific Highlands Ranch Public Facilities Financing Plan and Facility Benefit Assessment (FBA). Language describing the financing, costs, and timing of this and other trails is included within the FBA document.

185. See response 3 to the USFWS/CDFG letter.

186. The two basins shown in the MEIR on pages 218 and 219 are conceptual. The precise location and sizing of detention basins to serve the Pacific Highlands Ranch Subarea Plan would be determined at the time tentative maps are proposed for the various ownerships within the Subarea. All detention basins would be designed to reduce direct hydrology and water quality impacts to below a level of significance.

187. This recommendation from the JPA board is noted.

188. This recommendation from the JPA board is noted.

189. Comment noted.

Response

policies. Specifically, the Park's goals and objectives are incorporated into the Land Use, Urban Design, Open Space and Transportation chapters of the Framework Plan.

- 190 2. Page 93 - Although the dMEIR accurately outlines the goal, objectives, and implementing principles of the River Park Concept Plan under existing conditions in the Land Use section, the impact discussion that addresses consistency of the project with the Concept Plan limits its analysis to the single topic of trails. This analysis is not adequate as it fails to consider the project's consistency with the other goals and objectives established for those areas included within the Park's Focused Planning Area such as the preservation and restoration of sensitive biological resources, the establishment of viable wildlife corridors, protection of downstream water quality, and protection of visual quality. In addition, the River Park does not
- 191 concur that the current language included within the Subarea Plan provides adequate assurance that trails will ultimately be constructed within the subarea. As currently written, the subarea plan states that developer impact fees will be collected to pay for trails. The plan does not however provide any assurances that the trails will ultimately be constructed. For instance, how will the required trail easement be obtained along the western edge of the private high school. The subarea plan provides no direction or requirement to obtain a trail easement in association with the approval of future development plans for the school. In addition, no timetable for when the trail system should be developed is included in the subarea plan text. Unless more definitive language that is specifically coordinated with the permitting process as a prerequisite is included in the subarea plan text to ensure the timely construction of the trail system, it is not accurate to state that the plan is consistent with the River Park goal of providing a connected trail system between Los Penasquitos Canyon and the San Dieguito River Valley. This inconsistency represents a significant land use impact that could be mitigated by including within the Development Agreement the requirement that all trails anticipated in the subarea plan, including the trail segment within Del Mar Highlands Estates, shall be constructed by the developer in accordance with City Parks and Recreation Department standards and shall be completed prior to the dedication of open space to the City.
- 192 Finally, as will be described in greater detail below, the River Park does not believe that the project, as currently proposed, is consistent with the goals to preserve and protect sensitive biological resources, establish a viable wildlife corridor, or protect downstream water quality. Only if the project design is modified to maintain the original MHPA boundary in Area 6 and additional conditions related to trails, habitat restoration, permanent detention basins, and a wildlife undercrossing at El Camino Real are incorporated into the subarea plan and development agreement can the dMEIR conclude that the project is consistent with the goals and objectives of the San Dieguito River Park Concept Plan.

Biological Resources

- 193 1. Page 187 - The impact discussion states that the project will result in the loss of a number of sensitive plant species. In order to facilitate on- and off-site restoration projects, the subarea plan should recommend that prior to the commencement of any grading operations, the applicant should contact appropriate agencies and/or organizations, such as CNPS, regarding opportunities for plant salvage operations in areas designated for grading. Although not considered a

190. See Response 159 to the Carmel Valley Community Planning Board letter.

191. The Pacific Highlands Ranch Subarea Plan has an extensive discussion with associated exhibits indicating the type and design of the proposed trail system. The project includes over 15 miles of trails and takes the commitment to have these built seriously. Based upon your comments, language will be added to the Plan which will require all projects at the time of discretionary approvals to submit a Trail Plan which includes details of the timing, easements, dedication, and financing of said trails. This condition would apply to all projects, including the proposed private high school.

192. This position from the JPA is noted.

193. Salvage of sensitive plant species as appropriate from development areas is a component of the conceptual revegetation plan prepared for the project. Any salvage efforts would be conducted by qualified biologists during implementation of the revegetation efforts.

Response

mitigation measure, such a recommendation would benefit the regional goal of promoting successful habitat restoration.

- 194 2. Page 199 - Although not presented as mitigation, the dMEIR refers in several places to the approximately 100 acres of disturbed land within the MHPA that would be restored by Pardee. The dMEIR should include a map indicating where these 100 acres of restored habitat would be located.

- 195 3. Page 203 - The JPA disagrees with the conclusion that the proposed subarea plan would not impact wildlife movement within the Gonzales Canyon area. The MHPA was established to preserve sensitive resources and provide for viable wildlife corridors and larger habitat areas. The design, configuration and total acres included within the MHPA boundaries were established based on what the resource agencies and other biologists believed would be necessary to maintain a viable habitat preserve in this area. In order to ensure the health of the biological resources within the western end of the San Dieguito River Valley, an adequate area of open space must be maintained within proposed wildlife linkages, particularly Gonzales Canyon.

Of particular concern is the modification being proposed to the area referred to as Area 6. The deletion of approximately 44 acres of proposed open space from the MHPA at this location would change the function of this area from that of a resting area for wildlife to a more narrow corridor. An appropriate mitigation measure for ensuring the viability of the open space in Gonzales Canyon would be to maintain the original MHPA boundary in this area.

The proposal to modify the MHPA boundary at Area 6 results in a reduction in the quality of the wildlife corridor. As stated above, this impact should be avoided by maintaining the original MHPA boundary, however, if the modification is approved, then the proposed area of habitat restoration described in the dMEIR should be expanded to include the disturbed/agricultural areas located immediately to the south of the MHPA Adjustment Area 6. This would provide additional vegetative cover to compensate for the reduction in overall corridor width.

- 196 Finally, with respect to the overall north/south wildlife corridor, both the dMEIR and the subarea plan explain that "the on-site open space system would . . . provide a desired northerly linkage/wildlife corridor via a south-north tributary canyon to Gonzales Canyon. This north-south corridor is part of the regional wildlife preserve system . . . Undercrossings are proposed beneath SR-56 and Del Mar Heights Road to facilitate wildlife movement" (page 32 of the draft MEIR). This explains how wildlife can travel from Los Penasquitos Canyon to Gonzales Canyon; however, there is no discussion of how wildlife will travel from Gonzales Canyon to the San Dieguito River Valley. The City of San Diego MSCP Subarea Plan includes the following guideline for the Future Urbanizing Area: "If funds become available, place a large culvert or bridge undercrossing for wildlife movement where El Camino Real crosses the outlet of Gonzales Canyon in the San Dieguito River" (page 26). The development of Subarea III will alter the existing wildlife movement through the area by funneling all north/south movement between Los Penasquitos Canyon and the San Dieguito River Valley through Gonzales Canyon. Implementation of the project will also reduce the area available for foraging, shelter, and nesting. This represents a significant cumulative impact to overall wildlife habitat and wildlife

194. See responses 9 and 10 to the letter of comment from the USFWS/CDFG.

195. This recommendation is acknowledged. See also the letter of comment from the USFWS/CDFG.

196. The referenced north-south wildlife corridor is within the Del Mar Highlands Estates project which was approved in 1996. The approval for Del Mar Highlands Estates included a north-south connection approximately 700-800 feet in width which would allow for movement between Gonzales Canyon and the San Dieguito River valley. As such, this connection is not a component of the proposed Subarea Plans for Pacific Highlands Ranch.

Response

movement. Mitigation for this impact is available in the form of contributions to the cost of constructing a wildlife undercrossing at El Camino Real. Such an undercrossing would permit wildlife to more easily enter the larger open areas available in the western river valley.

Hydrology/Water Quality

- 197 1. Page 224 - Due to the extent of urban development proposed within the Subarea III planning area, there is considerable potential for significant downstream impacts to the San Dieguito coastal wetlands. To avoid or minimize such impacts, the proposed project should be required to construct and maintain permanent detention basins that will serve to capture silt, as well as reduce the quantity of urban pollutants that will leave the project site. The statement in the Mitigation, Monitoring and Reporting section that "Current plans call for the construction of desilting basins in the subarea" is inaccurate. The draft subarea plan states on page B-3 that "detention facilities for erosion control may be required" and "detention, desilting/water quality basins may be provided." If permanent detention basins are not specifically called out as required facilities within the subarea plan, then the Final EIR should identify significant, unmitigated impacts to downstream water quality as a result of project implementation.

Thank you for the opportunity to provide these comments. Please forward a copy of the final EIR and future public hearing notices to the River Park when they become available.

Sincerely,


Dick Bobertz
Executive Director

cc: JPA Board of Directors

197. It is recognized that as tentative maps are processed within Subarea III, conditions of approval will require that permanent detention basins be implemented to minimize impacts to Los Peñasquitos Lagoon. As described on page 224 of the draft MEIR, the exact number, size, design, and location of desilting/retention basins would be determined at the time tentative maps are processed. The location of basins shown on Figures 4D-3 and 4D-4 are conceptual and would be refined as detailed grading studies are completed for specific development proposals. It should be noted that the MEIR identifies significant unmitigated cumulative downstream water quality impacts.

California Native Plant Society

San Diego Chapter P.O. Box 1390 San Diego, CA 92112

Eileen Lower
Environmental Planner
City of San Diego
1222 First Avenue, MS 501
San Diego, CA 92101

Re: Pacific Highlands Ranch (Subarea III) Subarea Plan
LDR No. 96-7918 SCH No. 97111077

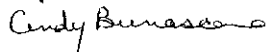
Dear Ms. Lower:

The San Diego Chapter of the California Native Plant Society has reviewed the draft Master Environmental Impact Report for Pacific Highlands Ranch (Subarea III) Subarea Plan in the North City Future Urbanizing Area (NCFUA), General Plan Amendment, NCFUA Framework Plan Amendment, Subarea Plan, Master Rezone, Multiple Habitat Planning Area Boundary Adjustment, and Local Coastal Plan Amendment. We have a few minor questions concerning the project.

- 198 Why are highly invasive species being utilized in the landscape plan when the project is adjacent to MSCP preserve? Is this consistent with MSCP adjacency guidelines given that surface water will likely be funneled into the preserve?
- 199 We could find no discussion of significance of impacts to non-covered species. While we believe the open space dedication mitigates most impacts, there should be discussion for the various species in the document to explain why the impact is not significant or mitigated for each species.
- 200 Chorizanthe procumbens is listed as onsite in Table 4C-2, we could not find the species mapped in Figure 4C-3. It is not clear if the species is internally mitigated.
- 201 Given that the impact to Brewer's calandrinia (*Calandrinia brewii*) is to a single plant and the impact might be considered insignificant, we ask that our organization be given permission to salvage the plant.

If there are any questions or issues that need further clarification, please do not hesitate to contact me at (619) 421-5767.

Sincerely,



Cindy Burrascano

Response

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MAY 19 1998

DEVELOPMENT

198. The landscape palette presented in the Subarea Plan indicates that plantings adjacent to natural open space within the MSCP should be native and any native naturalized species should be non-invasive. All plantings adjacent to the MSCP open space would comply with the directives and management guidelines described in the City's MSCP Subarea Plan.
199. Impacts to sensitive species are addressed on pages 187 and 192. Mitigation for all sensitive species are discussed beginning on page 198. See also response 19 to the USFWS letter.
200. This species was not observed during the surveys of the site and Table 4C-2 has been revised in the final MEIR.
201. See response 158 to the San Dieguito River Valley Regional Open Space Park letter of comment.



Friends of Los Peñasquitos Canyon Preserve

P.O. Box 26523, San Diego, California 92196
619-484-3219 • 619-566-6489 • FAX: 619-271-1425



Response

May 18, 1998

Ellen Lower
Environmental Planner
Development Services
Land Development Review Division
1222 First Ave., MS 501
San Diego CA 92101

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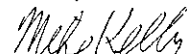
ENVIRONMENTAL ANALYSIS
SECTION

Re: MEIR for Pacific Highlands Ranch (Subarea III)

1. Hydroseed mixes for revegetation are listed in the Biological Resource Assessment for Subarea III document. We question two the plants listed for the "typical wetland mix." The first is *Lythrum hyssopifolia* (grass poly). Although Beauchamp's *Flora of San Diego County* lists this as a native, the new Jepson Manual: Higher Plants of California, now the current flora standard, lists this plant as introduced, not a native. In fact, it is a native to Europe. There is a California *Lythrum*, *Lythrum Californicum* that occupies similar wet niches. The second plant is *Rhus integrifolia* (Lemonadeberry). This is, of course, a wonderful native shrub. However, it is rarely found in riparian areas or wetlands. It is generally an upland species, especially to chaparral, but also in coastal sage scrub. Unlike the *Lythrum hyssopifolia*, which is invasive, the Lemonadeberry won't do any harm, but is not appropriate for a wetlands seed mix.
- 202 2. The Draft Subarea Plan lists Landscape Palettes. We note that a number of highly invasive tree, shrub and other plant species are included in the plant palettes. While some of these might be harmless in interior portions of the project, they should certainly not be used next to MSCP open space or in areas where their seeds could be carried via storm drains into the adjacent Preserve. Specifically, we call attention to *Schinus molle* (here called California pepper, more accurately called Peruvian pepper, reflecting the country it is native to), *Eucalyptus* species, *Acacia* species, *Olea europaea* (European olive), *Melaleuca* spp., *Myoporum* species and *Pittosporum undulatum* (Victorian Box). Also of concern is *Lonicera japonica* (Japanese Honeysuckle), a highly invasive vine, and *Atriplex semibaccata* (Australian saltbush), a highly invasive ground cover.
- 203

The City (and taxpayers) are spending tens of thousands of dollars and countless labor hours eradicating these same species from existing parklands where they threaten native species and habitats. Why not save taxpayer dollars and hours by substituting non-invasive species, native or non-native?

Sincerely,


Mike Kelly, president

202. These comments on specific species within the revegetation areas are acknowledged. The revegetation plan prepared for the Subarea Plan is conceptual in nature and a Master Revegetation Plan will be prepared to implement the revegetation associated with the Mitigation Land Bank.
203. See response 198 to the letter from CNPS above.

PR-98

Southwest Center
for
Biological Diversity

protecting and restoring the southwest's deserts, rivers, forests, and wildlife



Response

May 18, 1998

Eileen Lower, Environmental Planner
City of San Diego
Development Services
Land Development Review Division
1222 First Ave., Mail Station 501
San Diego, CA 92101

RE: Comments on the Draft Master Environmental Impact Report for the Pacific Highlands Ranch (Subarea III) Subarea Plan in the North City Future Urbanizing Area (NCFUA).

Dear Ms. Lower:

Thank you for the opportunity to comment on the Draft Master Environmental Impact Report for the Pacific Highlands Ranch (Subarea III) Subarea Plan. First, I would like to say that it is heartening to comment on a proposal with the potential to create a uniquely livable community. Many of the ideas set forth in the document are innovative and reflect concern for future residents and the overall quality of life. To take the plan from concept to product, however, requires careful attention to detail and carefully crafted policy to ensure successful implementation. As a result of the political context, both historically and currently, many of us, in the public, feel skeptical about the product that may result from a good concept once it has been influenced by powerful interests. In the case of Subarea III, some members of the conservation community, including our organization, are considering offering our support of the Phase Shift for the purpose of both promoting a livable community in the NCFUA and protecting critical habitat areas on Carmel Mountain. For this reason, we hope you will consider our comments carefully, and understand that we raise concerns in the hope that once our concerns are addressed we can feel comfortable with the plan and move forward.

To start, if our concerns are addressed, we would ultimately support Subarea Plan 1 and State Route 56 Alignment "F." This alignment of State Route 56 is consistent with the City's Subarea

Response

Plan for the MSCP and is a prerequisite to any development footprint in Subarea III, from our point of view.

Given that, please consider the following directed comments:


- 204 1. Figure 2-5 identifies several property owners in addition to Pardee. It is presumed that they too will benefit from a successful Phase Shift because they are located within the Subarea. There does not appear to be any specific discussion of these other properties in the MEIR. Please discuss their status. How will they be made consistent with the Subarea Plan? If Figure 3-1 (the map of land uses in the Subarea consistent with Plan 1) shows these smaller properties in open space, will they ultimately remain in open space? If the map shows a development footprint, is that the development footprint the public can expect to result from approval of a phase shift? Is there any guarantee or certainty about the future of these properties and their consistency with the plan as drawn in the MEIR?
- 205 2. The MEIR states that the processing of future specific development proposals will need to be consistent with this Master EIR. Furthermore, findings based on an Initial Study will ensure this consistency. What are the findings that have to be made? Please list the specific findings/criteria that must be satisfied to ensure that subsequent development is strictly implemented so as to be consistent with the MEIR.
- 206 3. It is suggested that Pardee's commitment to mitigate exceeds their mitigation obligation (resulting from proposed development) by "many acres." However, restoration of approximately 100 acres of disturbed habitat is counted as a "Gain" in the MSCP equivalency determination, yet this acreage is to be used as a mitigation bank according to the MEIR. If Pardee restores 100 acres of disturbed land, a short-term benefit may result, however, if Pardee is entitled to sell that land as mitigation in the future, the long-term net benefit is zero. For this reason, either Pardee should be required to do the restoration outright, and prohibited from banking it as credit, or the restoration should not be considered a "gain." Pardee must show "extraordinary benefit to the City," therefore, it is our opinion that the 100-acre revegetation plan in Subarea III should be an outright requirement and considered an extraordinary benefit.
- 207 Additionally, it should be recognized that using the City Manager's Compromise Plan line as the MSCP boundary on Neighborhood 8-A as a basis for judging equivalency is a misrepresentation of the facts. The MSCP preserve boundary was never determined for Carmel Mountain, and to say that the City Manager's Compromise Plan reflects an adopted preserve line means that the biological function, value, and acreage of the MHPA overall is being underestimated.
- 208 4. In the Project Description (pg. 40 of the EIR), it is stated that the residential element of the plan would comply with the affordable housing requirements of the Framework Plan. A set of options for fulfilling the affordable housing objective are listed. The document never reveals which of these options has been ~~has been~~ utilized, or the manner in which it will be implemented. To say that affordable housing will be provided, without any explanation of how, or in what form, is insufficient. The list of options is flexible. One of 4 options must be implemented, but the reader is left guessing which option(s) has been utilized. Discussion of high density housing, which is common throughout the document, is not a substitute, nor an explanation for how
204. The land use designations shown in the proposed Subarea Plan would, if adopted, establish the future development potential for each ownership within the Subarea. As individual development plans and tentative maps are brought forward, any proposal which is not consistent with the adopted Subarea Plan or the conditions described in the MEIR would require an amendment to the plan and additional environmental review.
205. See response 204 above.
206. The entire impact of Pardee's development will be mitigated through the dedication of undisturbed habitat within the MHPA. Pardee will be conveying additional land within their ownership that is also in the MHPA, in excess of that required through application of MSCP ratios. Land within this additional area that is disturbed would only be restored by others at a later date, or by the City as funding permits. The creation of a mitigation bank allows restoration to be done at an earlier date, enhancing the function of the preserve sooner rather than later. Restoration of land will always result in biological value to the preserve. That biological value is not reduced because some economic gain results.
207. See response to comment 149 to the Carmel Valley Community Planning Group.
208. The exact method of implementing the affordable housing requirement of the Subarea Plan has not been determined. However, pursuant to the Subarea Plan, any of the options described in Chapter 7 of the plan may be used to satisfy the affordable housing requirements. Each property owner within Subarea III would be required to comply with the affordable housing policies described in the Subarea Plan as tentative map conditions of approval.
209. See response 208 above.

Response

- affordable housing goals will be met. Offering a breakdown of residential uses, as is done, does not answer this question for the reader.
- 210 5. The Pardee Settlement Agreement is mentioned but not discussed. A description or explanation should be included as public information.
- 211 6. Please add the following language (identified by quotation marks). Fencing along property boundaries should be designed and constructed of materials that are compatible with the open space corridors, AND "buried a sufficient depth to prevent edge effects (that may result if people and animals dig under the fencing)."
- 212 7. When will the Habitat Management Plan be prepared? Will it be subject to public review? How will consistency with MSCP Table 3-5 be ensured?
- 213 8. On page 111 the EIR states that special management conditions apply including "minimization of edge effects (all), minimization of recreational use impacts (manzanita and ceanothus), and prohibiting collection and fire management (coast barrel cactus)." Fire management should be encouraged, not prohibited. Please reword/clarify this sentence which is unclear in its current form.
- 214 9. The EIR states that Third-Party Beneficiary status will be contingent upon "the permittee maintaining the biological values of any and all lands committed for mitigation pursuant to the permit and full satisfaction by permittee of mitigation obligations required by the permit." Will an annual audit/evaluation be conducted in order to determine if the permittee is fulfilling his/her obligations? Who will be responsible for monitoring whether obligations are being met? Will the evaluation be made public, or subject to public review? Some mechanism should be offered in the Final EIR to ensure compliance.
- 215 10. As a prerequisite, the public should know if the plan, as proposed in the MEIR, is consistent with the language of the 1985 Managed Growth Initiative (Proposition A). Can the reader assume that because the plan is consistent with the Framework Plan it is also consistent with the Prop. A ballot language? If so, this should be stated in the Final MEIR.
- 216 11. Some important design issues appear absent from the document. We have been told verbally that a grade separation will be created between homes abutting the preserve and the MHPA open space. Please include this detail in the Final MEIR.
- 217 12. The Biological Technical Appendix contains only a conceptual revegetation plan. The revegetation plan should be fleshed out for the Final document in order that we can assess its adequacy. Additionally, the Performance Standards contained in the conceptual reveg plan also seem to be conceptual. On page 21, under the section entitled "Performance Standards," the document states that success criteria will be "defined by the Performance Standards (discussed later)." They do not seem to appear anywhere later in the document. Please include the success criteria/performance standards in the Final MEIR.
- 219 13. Funding should be identified for the 'park and ride' and transit center prior to adoption.
210. There is not a Settlement Agreement associated with the proposed project. The references to the "Pardee Settlement Agreement" on pages 83, 105, and 186 of the draft MEIR are taken from the City of San Diego's MSCP Subarea Plan (Item C19).
211. Comment noted. Fencing consistent with the provisions of the MSCP and which is determined acceptable and approved by the City will be implemented as part of the Subarea Plan requirements.
212. The Habitat Management Plan has already been prepared as requested by the City and is an attachment to the Subarea Plan. The plan will be revised as necessary and implemented by the City, who will be responsible for ensuring consistency with Table 3-5.
213. The sentence has been revised in the final MEIR to read: These include minimization of edge effects (all), minimization of recreational use impacts (manzanita and ceanothus), fire management and prohibition of collection (coast barrel cactus).
214. The landowner will be responsible for maintaining the land in its existing condition prior to conveyance into the MHPA. This generally means that any activities that have been carried out routinely by a landowner will continue (e.g., prohibition of trespassing). The City is responsible for ensuring compliance with its own MSCP Subarea Plan.
215. Proposition A enables Subarea Plans to be prepared within the NCFUA. A phase shift vote will be required to implement any Subarea Plan which is adopted by the City Council.
216. The EIR and Subarea Plan both include Conceptual Grading Plans. These Grading Plans indicate grade separators between the MHPA preserve and the abutting development. Specific detailed project grading plans would be submitted when future discretionary projects are proposed and would include details of wall design, landscaping, brush management, and grade separation between the MHPA preserve and the development.
217. See response 202 to the letter from the Friends of Los Peñasquitos Canyon.
218. Specific performance standards will be a component of the actual Master Revegetation Plan which will be prepared to implement the revegetation requirements.
219. Funding for the Park-and-Ride and Transit Center are included within the Public Facilities Financing Plan and Facilities Benefit Assessment. The estimated costs, funding source, and projected year of construction is also included within these documents.

Thank you very much for your time and consideration. Again, it is exciting to imagine the type of community that could result from the proposed plan. It is never an accident when developments are planned wisely. Livable communities require political will, and hard work to make them a reality. I truly hope we see this concept evolve into a product that reflects wise-planning and concern for the quality of life. A carefully crafted MEIR and Subarea Plan is an important step in the right direction. We look forward to reviewing the final public documents.

Sincerely,



Allison Rolfe
Southern California Coordinator

Response

San Diegans for Responsible Freeway Planning



Response

May 13, 1998

City of San Diego
Development Services Business Center
Land Development Review Division
1222 First Avenue, Mail Station 501
San Diego, CA 92101

Attention: Ms. Eileen Lower, Environmental Planner

Subject: *Response to Draft Master Environmental Impact Report
(MEIR) Subarea III Plan in the North City Future Urban-
izing Area (NCFUA) (LDR No. 96-7918)*

Dear Ms. Lower:

San Diegans for Responsible Freeway Planning appreciates the opportunity to present our comments on the NCFUA Subarea III Plan Draft Master Environmental Impact Report (MEIR). Our organization represents a large number of City and County of San Diego property owners and residents concerned about regional traffic issues and the alignment for SR-56. We look forward to reviewing the Final MEIR and seeing our comments incorporated in its analysis.

Our specific comments on the Draft MEIR are as follows:

1. The Draft MEIR clearly outlines significant advantages within the proposed subarea plan to the SR-56 Central alignment alternative over the other proposed SR-56 alignments. These advantages are addressed in the Executive Summary on pages S46-48, and on pages 419-423. The Draft MEIR Conclusions state:

"Since the freeway would be separated from the community by open space, there would be a reduction in noise impacts to sensitive receptors, and an incremental reduction in air quality impacts due to the straighter alignment of SR-56 and correspondingly fewer miles traveled. The visual impact associated with noise walls to reduce freeway noises would be almost entirely avoided. This alternative would affect only one important cultural resource site, as opposed to six sites for the proposed 'D' alignment of SR-56 and five sites for the 'F' alignment. The central alignment alternative would reduce impacts to about 25 acres of potentially fossil bearing geologic formations."

Section 4E, Landform Alteration/Visual Quality, also indicates that the existing aesthetic character of the area would be adversely impacted by having SR-56 running through the planned development.

Negative visual, noise, pollution, regional mobility, and cultural resource impacts are detailed for the SR-56 D and F alignments. As such, it would be inappropriate to

PR-103

Response

- 220 subject current and future residents to these problems when the Central alignment alternative for SR-56 eliminates these issues.
- 221 In addition, given the proposed "community village" nature of the subarea plan and the fact that SR-56 will run through the middle of the community if alignments D or F are implemented, the negative environmental psychological impact of the SR-56 D and F alignments on the community residents should be fully analyzed in the Final MEIR.
2. In figures 4B-1 and 4B-2, the Draft MEIR shows that the average daily traffic volume on Rancho Santa Fe Farms Road and Rancho Diegueño Road is projected to increase as a result of the subarea plan from the current 2000 vehicles to 5,900 vehicles. This is nearly a 200% increase in an exclusively residential area. These rural residential streets have extensive direct driveway access and no sidewalks, and they are regularly crossed by children, horses, dogs, and wild animals such as bobcats and coyotes. In addition, at the current level of use, Rancho Santa Fe Farms Road has been the site of numerous serious accidents resulting in injury and destruction of property. To claim, as the Draft MEIR does on page 140, that a 200% increase in traffic on these rural residential streets is "not considered a significant effect", is clearly inappropriate. This projected increase in traffic must be mitigated.
- 222
3. The Draft MEIR is flawed since it does not adequately analyze the impact of increased traffic on Rancho Santa Fe Farms Road, Rancho Diegueño Road and San Dieguito Road with respect to the following factors: noise, community character, public safety, driveway access, sight distance and posted speed.
- 223
4. Figure 4B-2 of the Draft MEIR shows that between El Camino Real and Camino Ruiz, the only collector street north of Carmel Valley Road will be Rancho Santa Fe Farms/Rancho Diegueño Road. El Camino and Camino Ruiz are designated 4-6 lane major arterials, and Rancho Santa Fe Farms/Rancho Diegueño Road are 2 lane rural residential streets. It should be noted that on pages 114 and 132, and in Table 4B-9, both El Camino and Camino Ruiz are shown to have northern segments that will be reduced to level of service (LOS) E to F, while Rancho Santa Fe Farms/Rancho Diegueño Road will be reduced to LOS C. Given the LOS differential between these routes, the Final MEIR should analyze the impact to Rancho Santa Fe Farms/Rancho Diegueño Road resulting from anticipated diversion of El Camino and Camino Ruiz traffic to Rancho Santa Fe Farms/Rancho Diegueño Road.
- 224
5. Table 4B-1 of the Draft MEIR shows the design volume of Rancho Santa Fe Farms Road as 7,500, but Table 4B-9 indicates a volume of 10,000. The Final MEIR should explain the differential between these figures.
- 225
6. In the discussion of the subarea plan's traffic circulation cumulative impacts, the Draft MEIR states on page 137, "A freeway segment analysis of Subarea Plan 1 shows that I-5 and I-15 are projected to operate at a LOS F. All freeway segments for SR-56 are projected to operate at a LOS D or better." Given the existing and projected problems

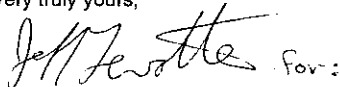
220. This comment on the Central alignment alternative is noted. While some impacts would be lessened, it should be noted that significant impacts would result in other environmental issue areas.
221. The land use compatibility impacts associated with SR-56 freeway alignments and the proposed land uses under Subarea Plans 1 and 2 is described in the Land Use section of the MEIR.
222. See response 70 to County of San Diego (Doug Isbell) letter and response 145 to Fairbanks Ranch Association letter.
223. See response 222 above.
224. See response 222 above.
225. Different levels of service are used for design volumes and street capacities. The 7,500 is a design volume which is based on a level of service "C." The capacity of 10,000 is based on a level of service "E."

Response

- 226 with traffic congestion on I-5, I-15 and SR-56, the Final MEIR should include full mitigation measures resulting in LOS C or better for these freeway segments.
7. The previously distributed Draft EIR for SR-56 concluded that the northern alignments would have significant unmitigated impacts on the transit oriented development (TOD) goals for Subarea III incorporated in the NCFUA Framework Plan. This issue should be analyzed in the Subarea III MEIR with respect to the effects of the northern alignments on achievement of Framework Plan goals and overall land use planning within Subarea III.
- 227
8. The previously distributed Draft EIR for SR-56 concluded that the Central alignment would have significant unmitigated impacts with respect to fragmentation of a large block of habitat within the NCFUA environmental tier, and designated within the City of San Diego's MSCP Subarea Plan. The Subarea III Plan MEIR should analyze the degree to which the northern alignments would similarly result in fragmentation in the North Metro portion of the County's Subarea Plan. In addition, the extension of surface streets required to serve the northern alignments should be documented in the Subarea III Plan MEIR, along with their effects on McGonigle Canyon and overall fragmentation.
- 228
9. If the Subarea III Plan MEIR concludes that fragmentation of a large habitat block associated with the Central alignment would result in significant and not mitigable impacts to biological resources and overall preserve planning, that conclusion should be documented by factual information. For example, it is our understanding that the habitat block of concern with respect to the Central alignment is approximately 1,200 acres in size, and that traversing the habitat block with SR-56 would result in two habitat blocks of approximately 700 acres and 500 acres. It is also our understanding that SR-56 would be constructed in a manner that would minimize or mitigate impacts to wildlife movement. What species currently exist within the 1,200 acre habitat block that would not be able to persist while living within and moving between two habitat blocks, 700 acres and 500 acres in size?
- 229

We appreciate your consideration of our comments and look forward to reviewing the Final Subarea III Plan MEIR. Upon distribution for public review, please provide us with six copies of the Final MEIR at the following address: San Diegans for Responsible Freeway Planning c/o Scott Harvey & Associates, 945 Fourth Avenue, San Diego, CA 92101.

Very truly yours,



Jeff Ferrelle For:

SAN DIEGANS FOR RESPONSIBLE FREEWAY PLANNING

San Diegans for Responsible Freeway Planning represents citizens from the communities of

226. Planned mitigation measures for I-5 and I-15 are shown on Table 24 of the traffic report.
227. The Pacific Highlands Ranch EIR and Subarea Plan provide discussion and alternative plans for all four SR-56 freeway alignments. The Framework Plan goals and guiding principles include an open space system, a core mixed community, and a variety of housing types. These elements are incorporated into each of the four alternative Land Plans. While locating SR-56 north of Santa Monica Ridge has implications, the mixed-use core continues to be incorporated into each land use plan. The Metropolitan Transit Board (MTDB) determines both type and timing of public transit. The applicant and City have been and will continue to work closely with MTDB to insure that transit amenities are completed as soon as sufficient population exist to justify them. Funding for the Park-and-Ride and Transit Center are included within the Public Facility Financing Plan and Facilities Benefit Assessment.
228. The issue of habitat fragmentation associated with the northern alignments of SR-56 and the corresponding Subarea Plan is fully described in the Land Use section of the MEIR (Issue 5) and the Biology section (Issues 2 and 3).
229. All species currently residing in the 1,200-acre habitat block would be affected by the division of that block into two separate blocks. The impacts would be direct and indirect. The response to comments (USFWS letter of comment) in the Final EIR for SR-56 (City of San Diego 1998) indicates that the Central alignment would be biologically inferior as it would not leave Deer Canyon free of utilities, facilities, and roads (requirement C-13 of the City's MSCP Subarea Plan). The USFWS has further identified Deer Canyon as a "core" area that should be protected from future development. See also the letter of comment above from the USFWS on this MEIR.



San Diego County Archaeological Society

Environmental Review Committee

17 May 1998

RECEIVED

MAY 21 1998

RECON

To: Ms. Eileen Lower
Land Development Review Division
Development Services Department
City of San Diego
1222 First Avenue, Mail Station 501
San Diego, California 92101

Subject: Draft Master Environmental Impact Report
Pacific Highlands Ranch (Subarea III) Subarea Plan in the North City
Future Urbanizing Area (NCFUA)
LDR No. 96-7918

Dear Ms. Lower:

I have reviewed the cultural resources aspects of the subject DMEIR on behalf of this committee of the San Diego County Archaeological Society.

We note the results of the cultural resources research performed by Gallegos & Associates and by RECON, and are, in general, in concurrence with the recommendations presented. Specific comments are as follows:

- 230 (1) There may be a need for proactive mitigation measures for indirect impacts to sites which remain in open space. This should be specifically addressed when the individual tentative maps are submitted for environmental review.
- 231 (2) Both technical studies, as well as the DMEIR, fail to address curation of the collections from both the work conducted to date and the work to be required as conditions of approval of this and future individual projects. The attached *SDCAS Policy on Curation* addresses the issue. It should be noted that curation of the collections could be considered a partial mitigation measure for cumulative impacts to cultural resources. As suggested in the DMEIR, such impacts are significant and unmitigated.
- 232 (3) We will review the impacts and mitigation for the individual tentative maps when the applicable DEIRs are provided to us during their public review periods.

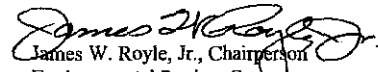
Response

230. As noted in the draft MEIR, indexing of sites in open space would be required as individual tentative maps are processed pursuant to the Subarea Plan.
231. The curation of collections has been included as a mitigation measure in the final MEIR.
232. Comment noted.

Response

Thank you for including SDCAS in the public review of this document.

Sincerely,


James W. Royle, Jr., Chairperson
Environmental Review Committee

cc: Gallegos & Associates
RECON
SDCAS President
file

Response

SDCAS POLICY ON CURATION (Adopted by SDCAS Board on 10/21/97)

- (1) For mitigation of impacts to cultural resources to be complete, all collections resulting from survey, testing, salvage excavation and monitoring activities must be curated in a qualified facility. "Qualified" is intended to mean one which meets the standards of 36 CFR 79 and any and all applicable federal, state and local laws. In the context of this policy, "collections" includes the artifacts and other collected material, plus all field notes, photographs and other documentation relating to them.
- (2) To ensure reasonable accessibility to researchers, collections from within San Diego County should be curated within the county.
- (3) Jurisdictions should require curation, as discussed in (1) and (2), above, for all collections resulting from new projects under their purview.
- (4) Where a new project relies upon previous archaeological fieldwork as a basis for mitigation of a new project, the applicant must be responsible for locating, inspecting and upgrading, as necessary, all collections from the previous fieldwork. The inability to locate such collections will make reliance upon the work that produced them impossible, and new fieldwork should be required.
- (5) Jurisdictions should support and help archaeologists and others to solve the problem of locating, upgrading and curating earlier collections for which no provision was made for curation.

A:\CURATION.POL

Response

SIERRA CLUB, SAN DIEGO CHAPTER
San Diego and Imperial Counties
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San Diego, CA 92104-3623

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May 18, 1998

BY FACSIMILIE

Eileen Lower
Environmental Planner
City of San Diego
Development Services
Land Development Review Division
1222 First Avenue, Mail Station 501
San Diego, CA 92101

Re: Comments on Draft Master Environmental Impact Report for Pacific Highlands Ranch
(Subarea III) Plan in the North City Future Urbanizing Area. LDR No. 96-7918 / SCH
No. 97111077

Dear Ms. Lower,

Thank you for this opportunity to comment on the above referenced Draft Master Environmental Impact Report ("Draft MEIR") for the proposed Pacific Highlands Ranch Draft Subarea Plan ("Draft Subarea Plan"). The Sierra Club very much appreciates the efforts of Development Services and particularly the City's ongoing facilitation of discussions by all parties and the numerous site visits. We look forward to continued constructive relationships and anticipate that these comments will facilitate our continued discussions regarding the City's planning efforts and conformance with environmental laws and regulations, as well as the proposed phase shift.

COMMENTS

Preferred Alternative

- 233 The Sierra Club supports the Plan 1 SR56 alignment as its preferred alignment alternative for the reasons articulated in the Sierra Club's letter of March 6, 1998 related to the Draft Revised Environmental Impact Report for the Middle Segment of State Route 56, LDR No. 95-0099, SCH No. 960309, which is included as Attachment 1. The Plan 1 alignment represents the best compromise between the needs of biological resources, the existing development and the need for community cohesiveness.
- 234 The Sierra Club specifically opposes the Central Alignment as it violates the standards and guidelines underpinning the MSCP planning process concerning preserve design criteria. To ensure adequate preservation of wildlife, plants and habitat types, the preserve design calls for

233. The Sierra Club's comments on the alignments of SR-56 are noted.

234. The Sierra Club's comments on the alignments of SR-56 are noted.

saving intact the largest possible blocks of land. Fragmentation is correctly recognized as the antithesis of preservation because of the severe impacts of edge effects that development, including roads, bring into a habitat. The Central Alignment would fragment one of the largest blocks of habitat in the MSCP and the largest in the North City area. This area is part of a Core Biological area of the MSCP, one of the most important parts of the MSCP. It would fragment the last pristine coastal canyon and mesa top left in San Diego. As such, this alignment would compromise the biological integrity of the proposed MSCP/Environmental Tier and these impacts would be significant and unmitigable.

235 Further, the Central Alignment will have the following additional adverse impacts:

- Hydrologic Impacts: The Central Alignment subjects its associated drainages to a greater extent of hydrological impacts, impacting a greater amount of floodplain than the Northern Alignment.
- Landform Alteration/Visual Quality: The Central Alignment would result in a more substantial contrast with the surrounding visual quality and undisturbed, natural character of the proposed MSCP preserve within Deer Canyon. This is also an issue under the Local Coastal Program.
- Geology/Soils: The Central Alignment would be exposed to a greater extent of these constraints, specifically unstable soils and geologic units, liquefaction, landslides, and severely erodible soils. Also, the Central Alignment would be exposed to a greater extent of geologic hazards than the Northern Alignment, including a mapped landslide and a larger area of Friars Formation along the slopes of Deer Canyon.
- Noise impacts: The noise impacts for the two alignments are not equal. The impact to wildlife of the estimated 60 dB noise levels of the Central Alignment as it traverses 1.4 miles of the Environmental Tier is not adequately addressed. Even the DEIR for Torrey Highlands at least recognized the probable negative impact of Central Alignment noise on mule deer and other wildlife. These cumulative negative factors and impacts of the Central Alignment represent a significant effect under CEQA.
- Wildlife Corridors: The 1.4 miles where the Central Alignment traverses the Environmental Tier is very conducive to wildlife movement. In fact, even cursory surveys reveal an existing network of trails and dirt roads currently used by wildlife to move in all directions over the ridge.

Land Use

The Draft MEIR states that Plan 1 would be inconsistent with the Resource Protection Ordinance ("RPO") in that it would allow encroachment on steep slopes in excess of that allowed under the RPO. Further, the Draft MEIR concludes that only the No Project Alternative or the RPO alternative would mitigate for this loss. The Draft MEIR concludes that this encroachment is acceptable as compliance with the RPO would require a project redesign, thereby losing the benefits of the Plan 1 design.

235. Comment noted.

Sierra Club Comments on
Pacific Highlands Ranch Draft MEIR

- 236 One of the purposes of steep slope ordinances is to prevent erosion and destabilization of slopes which lead to increased sedimentation loads in storm water runoff. The only storm water collection facilities are two proposed, but not required, retention basins. To mitigate for the surface water impacts of development on steep slopes, the Draft MEIR should require additional storm water management structures beyond the two retention basins in accordance with the Sierra Club's comments under Hydrology/Water Quality, below.
- 237 Further, the Draft MEIR has not surrounded the village center with higher density development. Figure 3-1. The low density residential developments to the northeast and northwest of the village center might be better zoned as peripheral residential with a corresponding increase in open space. Is this possible?

Traffic Circulation/Air Quality

- 238 The Draft MEIR's entire discussion of alternative modes of travel appears to consist of one rather short paragraph on page 141. In this the Draft MEIR "envision[s]" a series of trails and indicates the different types of trails possible. The Draft MEIR's discussion of mass transit is limited to the location of the transit center and the possibility of reaching these by a variety of transportation modes without further elaboration. Page 142. In contrast, the city's Framework Plan requires the following with regard to land use:
- 3.1e Integrate facilities for non-automobile travel into the NCFUA transportation system, and support alternatives to automobile use through land use and urban design principles.
- 239 The Draft MEIR also makes the puzzling statement in its Draft Subarea Plan that bike parking might become an "attractive nuisance." Draft Subarea Plan page 50.
- 240 Further, the Draft MEIR has identified that this project will have significant direct and cumulative impacts on regional transportation. Pages 154, 398. Yet, despite this statement, the Draft MEIR asserts that "the Pacific Highlands Regional Plan includes an effective and comprehensive development phasing program, which would preclude any significant impacts to public services and facilities or traffic congestion." Page 384. The Draft MEIR also concludes that this project will contribute to significant cumulative air quality impacts. Pages 286, 400.
- 241 With regard to cumulative air quality impacts, it states that "[n]o mitigation is available for cumulative air quality impacts at the project level." Page 400.

Alternative Modes of Transportation

- 242 *General Comments:* The Draft MEIR's evaluation of and planning for alternative modes of transportation is wholly inadequate. Nowhere does the Draft MEIR discuss the potential to mitigate significant adverse traffic and air quality impacts through the use of alternative modes of transportation. Rather, the Draft MEIR appears to tally-up the cumulative automobile related impacts and list transportation improvements designed for automotive travel and hope for the
- 243 best. The presence of a phasing program might make for orderly cumulative transportation

Response

236. The two basins shown in the MEIR on pages 218 and 219 are conceptual. The precise location and sizing of detention basins to serve the Pacific Highlands Ranch Subarea Plan would be determined at the time tentative maps are proposed for the various ownerships within the Subarea. All detention basins would be designed to reduce direct hydrology and water quality impacts to below a level of significance.
237. The proposed land use plan surrounding the Village Center is intended to provide a transition of land uses between the MHPA open space and the more intensive Core Residential Uses in the Center (i.e., Residential at up to 35 du/acre). As such, low density residential adjacent to the MHPA is planned northeast and northwest of the Village Center with intervening Peripheral Residential, providing a mixture of residential uses.
238. The Subarea Plan includes specific design standards which are intended to integrate facilities to support alternatives to the automobile. The trail system will also provide opportunities for residents to bike or walk from their homes to the Transit Center. While the precise design of the transit center is not known at this time, the central location has been coordinated with MTDB. A location which allows buses to pick up and drop riders and circulate away from major roads is important. The park-and-ride facility which is located within the Employment Center will allow peak hour drop-offs and is located with easy access to Carmel Valley Road. The transit center also differs from the park-and-ride in that it does not provide large parking areas which detract from the urban Village, pedestrian-oriented goals.
239. The purpose of this sentence is to encourage bicycle parking facilities to be provided and well designed within the Village. The phrase "attractive nuisance" is confusing and will be deleted from the Subarea Plan. This statement was not included in the draft MEIR.
240. The referenced citation to page 384 in the draft MEIR is within the context of population growth and the phasing of development to ensure that there will not be indirect impacts on regional infrastructure.
241. This comment on cumulative air quality impacts concurs with the conclusions of the draft MEIR.
242. The Subarea Plan incorporates measures which would serve to reduce the project's contribution to cumulative air quality impacts. These measures include bicycle and pedestrian paths, transit center in the Village Center, and an Employment Center; all of which can reduce vehicular trips.
243. This comment on the development of transit services as the project is phased is acknowledged. See response 8 to the letter from San Diegans for Responsible Freeway Planning.

impacts, but it will not preclude significant indirect impacts to traffic congestion. What phasing can do is develop transit services in step with development rather than waiting until most of the development is completed before providing transit services. The phasing program should require the completion of transit amenities as soon as sufficient population exists to justify the amenity.

- 244 Moreover, the Draft MEIR does not show how the City intends to integrate facilities for non-automotive transport and it provides no detailed guidance on where bike and pedestrian paths are appropriate given this requirement. Figure 3-9 indicates the location of the anticipated trail system. Has the City performed any planning with regard to this system? Is it based on any formal policy? What efforts has the undertaken to integrate this system to facilitate non-automotive transport, integration being more than mere existence?
- 245 The Draft MEIR states that air quality mitigation is not available at the project level. Why? An effective alternative transportation plan would help to mitigate the impacts of increased traffic and also air quality. The air mitigation might not be easily quantifiable, but mitigation does not include only emissions trading/offsets, though these might be possible.
- 246 *Bicycle Lanes/Paths/Parking:* It appears that the City has not planned the bicycle path/lane system (or the pedestrian system for that matter) in accordance with any particular policy but rather has based the bicycle system on convenience and the use of MHPA lands, urban amenities in flood plains, and the right-of-ways alongside major roads. For example, the bike system does not link to the proposed east and west elementary schools (the west school has a pedestrian path and links to a MHPA trail, but school kids are going to be coming more frequently from the surrounding neighborhood and not the MHPA). Also, this lack of connectivity between schools means that kids will need to be driven to inter-school activities rather than walk or ride bicycles. As a further example, no bike path follows Del Mar Heights Road to the Civic Center or the Community Park and no bike path is shown going to the Transit Center. Figure 3-9. In addition, no bicycle paths are shown going to or in existing developments. Figure 3-9.
- 247 Bike lanes appear to be required on major roads. The Draft Subarea Plan shows bicycle lanes on roads classified as A, B, C, D, and E. Draft Subarea Plan, Figures 4-5 – 4-7. Will the City require bicycle lanes on all roadways of these classes? If so, all of these bicycle lanes should be indicated.
- 248 Bike lanes are also needed on non-major roads. Figures 4-7 and 4-8 of the Draft Subarea Plan indicates that no bicycle lanes are provided for village roads. Why? These roads will be in high density automobile and pedestrian areas, the places where intermodal conflicts are most likely to exist. This is particularly true on roadways with diagonal parking because the travel lane edge is less well defined and drivers backing out may have difficulty seeing approaching bicyclists.
- One of the advantages of bicycles over cars is that relatively high bike usage is compatible with side streets. Further, due to the slowness of bicycles relative to cars and the difficulty many bicyclists have on steep grades, it is very important that bicycle paths follow the shortest route possible with the least grade change. Has the City evaluated whether any of its proposed bicycle paths are efficient for bicyclists?
- 249

244. The Pacific Highlands Ranch Plan includes over 13 miles of trails to facilitate non-automotive transport. The location and design of these trails, which includes equestrian, bicycle, and hiking have been closely coordinated with local equestrian groups, the San Dieguito River Park staff, state and federal resource agencies, and the community. Further, language is being added to the Subarea Plan which will require all projects at the time of discretionary approvals to submit a Trail Plan which further details the timing, easement dedication, and funding of these trails.
245. See responses 237 and 238 above.
246. The Subarea III bike path/lane system has been designed to facilitate non-automotive transportation. For example, the east and west elementary schools are linked with a bike path. The designated pedestrian path allows both pedestrian and bike transportation. Additionally, both bike and pedestrian trail links are made from the school/parks to the various residential neighborhoods and Village along the urban amenity and the expanded parkway system. These trail systems will allow residents and children to get to and from the schools/parks via bikes or walking. Further, the regional trail system exhibits are intended to indicate only the major trail links within the project. Details of additional trail and bike lane linkages within the project and Village will be provided as part of the actual project plans and discretionary PCD approvals. It is fully anticipated that bike and pedestrian trails will link all parts of the project and provide a functional, well designed, non-automotive transport system.
247. See response 246 above.
248. See response 246 above.
249. See response 246 above.

Response

Sierra Club Comments on
Pacific Highlands Ranch Draft MEIR

- 250 What is meant by a bike parking area becoming an "attractive nuisance"? Draft Subarea Plan, page 50. This is a legal term with a specific meaning and does not appear to make sense in this context.
- 251 The Sierra Club requests that the City incorporate planning guidance for establishing bicycle paths for commuters that takes into account, at a minimum, shortest routes, grade, speed and volume of automobile traffic, safety, and aesthetics. Following this, the City should reevaluate the proposed trail system for Subarea III to ensure that safe, efficient bicycle commuting is an option for all residents of Subarea III, including those residents in low density areas.
- 252 *Pedestrian Trails and Walkways:* With regard to pedestrian traffic, although the City anticipates pedestrian friendly design around the transit center and civic center, nowhere does the Draft MEIR discuss how the City intends to incorporate pedestrian friendly design as a feeder system for these areas. Will all the roadways built in this Subarea conform to the designs in Figures 4-5 to 4-8 of the Draft Subarea Plan?
- In order for pedestrians to walk to these areas, the walk needs to be relatively easy with regard to grade and relatively pleasant. Most of the multi-use trails identified in Figure 3-9 run adjacent to major roads, often between the roads and what appear to be large parking lots either related to the park and ride and commercial retail facilities (see Exhibit 5-9 in the Draft Subarea Plan and particularly the parking provided for the commercial retail facility on the west side of the village center). What amenities will exist to buffer users from the automotive traffic and parking lots?
- 253 What planning requirements exist to limit the "sea of asphalt" effect? Also, the pedestrian paths tend to follow planning zone borders rather than pass through neighborhoods. Will the City require that the neighborhoods adjacent to the village center have easy entrance and egress by foot for residents of outlying neighborhoods?
- Figure 3-12 indicates that the town green will be ringed by a "2 Lane Urban 'Main Street' and a '4 Lane Urban Collector with Parallel Parking". Further, it appears that the center of the village, the "Plaza", will be a rotary intersection for automobiles. The design for the town green appears to make it a nice place to look at as one drives past, but not necessarily a pleasant place for lunch, a quick walk during a work break, or a village festival. Is this automobile rotary necessary for traffic flow? Has the City performed any analysis of traffic flow within the village area? Would a pedestrian mall and additional green space provide higher utility than another automobile entrance to the area?
- 255
- 256 Moreover, the "4 Lane Urban Collector with Parallel Parking" will separate the town green from the community park. This seems to defeat the City's desire to create a unified village center. Given the proposed location of the high school/junior high and the park, the City can anticipate heavy student automobile traffic in this area as well as heavy student and youth pedestrian traffic between the school complex and the village center. Is this a safety problem? Has the City taken this potentially heavy foot traffic into account in its village traffic planning? Could these areas be linked by not having Del Mar Heights Road pass through them, but rather be sunk / underground (a common practice in other urbanized areas) or be terminated at the edge of the park? Del Mar Heights Road, after all, is not a through street like Camino Santa Fe/Carmel Valley Road; instead it mostly appears to provide access to the village, the high School, and the core residential area east of the village. What other options exist for linking these areas in a

250. The purpose of this sentence is to encourage bicycle parking facilities to be provided and well designed within the Village. The phrase "attractive nuisance" is confusing and will be deleted from page 50 of the Subarea Plan.
251. Currently, the City has no adopted planning guidelines for bicycle paths regarding grade, aesthetics, or shortest routes. However, the Subarea III bicycle and trail plan has been designed with these criteria in mind and will provide a functional, well-designed, non-automotive transport system.
252. The Subarea III Concept Trail Plan is intended to show only the major project trails. As each project is submitted for discretionary approval, they will be required to provide detailed trail design information. This includes the Village and Town Center areas which will indicate pedestrian and bike access within and to the transit center and Village area. Figures 4-5 and 4-8 in the Draft Subarea Plan are intended to show the various project street sections. These include pedestrian and bike paths which are separated from the street with landscape buffers and other pedestrian friendly design elements.
253. Exhibit 5-9 of the Subarea Plan is intended to be illustrative only. Chapter 5, Community Design provides detailed discussion and development standards for the project and Village area. Standards for block size, setbacks, land use, parking, and building massing are included and are intended to insure a functional, pedestrian-oriented Village. Individual projects will be reviewed against these standards as part of the discretionary project approval process.
254. See response 253 above.
255. The Town Green/Civic Center is intended to be used for civic activities and open air public gatherings. The precise design, size and traffic analysis of the civic center, however, will be determined concurrent with the first commercial development permit within the Village. If developed by the City, this area will be a maximum of five acres. If not developed by the City, this area will be a maximum of two acres and will be owned and maintained as part of the larger commercial development. In either case, the civic center will need to function as intended by the Subarea Plan and will be subject to full public comments and review. Frequent intersections and cross walks will be provided along the four-lane urban collector which separates the civic center/Village area and the high school/jr. high/community park. The intersections will slow traffic and allow pedestrians to have easy and safe access between these two areas. Pedestrian flyovers or tunnels have not been considered.
256. See response 255 above.

Response

more pedestrian friendly way? Has the City considered pedestrian flyovers or tunnels? Could Del Mar Heights Road at least be narrowed when it passes between the town center and community park?

- 257 *Mass Transit:* The City is planning a transit center and it indicates that it intends to integrate this center into a variety of transportation modes, yet does not discuss what policies or design elements are needed to do this. Locating it "close" to residential areas does not mean that commuters will walk or bicycle to the center. Rather, a variety of factors, such as safety, aesthetics, and efficiency determine this usage. Many commuters drive only a few blocks to transit centers and park and rides because the walk or bike trip is dangerous and/or unpleasant. What City planning elements and policies encourage walking or biking to a transit center or park and ride? Which or these are required by the Draft Subarea Plan?
- 258 With regard to the "kiss and ride" capacity of this facility, does it make sense to put this facility in the heart to the village? Given that a substantial number of drop-offs could occur, would it make more sense to locate it with easy access to Carmel Valley Road or another major road? A block or two additional walk, if pleasant, might not deter a pedestrian, but a lineup of cars in relatively narrower village streets could make the drop-off area more congested and reduce the attractiveness of the area for pedestrians.
- 259 Also, what transit amenities are provided in the residential neighborhoods? What feeder systems will gather commuters from the low density areas and bring them to the transit center? Will each low density neighborhood have a transit pickup site within walking distance of all the homes in a neighborhood so that neighborhood shuttles can transport commuters to the transit center? Have the transit plans incorporated the needs of the disabled and elderly?
- 260 *Parking:* The village center shows large areas devoted to parking lots. Draft Subarea Plan Exhibit 5-9. What guidelines exist for determining whether a facility must contain its parking within the footprint of a structure? Has the City determined the impact of parking lots on the propensity of commuters to walk to work? Also, the City should minimize the footprints for parking lots and require parking structures and require use of the land for small urban open spaces around buildings, whether these be private commercial spaces for restaurants or urban microparks.

Biological Resources

- 261 Figure 2-5 identified several property owners in addition to Pardee. It is presumed that they too will benefit from the Phase Shift because they are located within the Subarea. The MEIR does not appear to have any discussion of these other properties. Please discuss their status. How will they be made consistent with the subarea? If Figure 3-1 (the map of land uses in the Subarea consistent with Plan 1) shows the properties in open space, will they ultimately remain in open space? If the map shows a development footprint, is that the development footprint the public can expect to result from approval of a phase shift? Is there any guarantee or certainty about the future of these properties and their consistency with the plan as drawn in the MEIR?

257. The City adopted the Transit-Oriented Development Design Guidelines in 1992. Additionally, the Subarea III Plan includes specific design standards which are intended to make the project pedestrian friendly. The trail system will also provide opportunities for residents to bike or walk from their homes to the Transit Center. While the precise design of the transit center is not known at this time, the central location has been coordinated with MTDB. A location which allows buses to pick up and drop riders and circulate away from major roads is important. The park-and-ride facility which is located within the Employment Center will allow peak hour drop-offs and is located with easy access to Carmel Valley Road. The transit center also differs from the park-and-ride in that it does not provide large parking areas which detract from the urban Village, pedestrian-oriented goals.
258. See response 257 above.
259. See response 257 above. Also, transit service to the residential neighbors will be available. The precise routing and pick-up shelter designs will be determined by MTDB concurrent with individual project discretionary permits.
260. Exhibit 5-9 of the Subarea Plan is intended for illustrative purposes only. Chapter 5 of the Subarea Plan provides development standards including street treatments, block size, and parking lot design. Page 47 of the Subarea Plan, for example, includes a requirement that parking lots will not be allowed on the main street frontages of Zones 2 and 3 and are discouraged within Zone 1. Parking structures are also encouraged and will be considered as part of the project discretionary approvals.
261. See response 204 to letter from Southwest Center for Biological Diversity.

Sierra Club Comments on
Pacific Highlands Ranch Draft MEIR

Response

- 262 The MEIR states that the processing of future specific development proposals will need to be consistent with this MEIR. From what I can tell, findings based on the Initial Study will ensure this consistency. What are the findings that have to be made? Please list the findings/criteria that must be satisfied to ensure that subsequent development is strictly implemented so as to be consistent with the MEIR.
- 263 Pardee has to show "extraordinary benefit to the City." In order to do this, the 100-acre revegetation plan in Subarea III should be an outright requirement. Pardee should not be able to sell it as mitigation after they do the restoration work as this would constitute double counting.
- 264 In the Project Description (pg. 40 of the MEIR), it is stated that the residential element of the plan would comply with the affordable housing requirements of the Framework Plan. A set of options for fulfilling the affordable housing objective are listed. The document never reveals which of these options has been utilized, or the manner in which it will be implemented. To say that affordable housing will be provided, without any explanation of how, or in what form is insufficient. The list of options is flexible. One of 4 options must be implemented, but the reader is left guessing which option(s) has been utilized. Discussion of high density housing, which is common throughout the document, is not a substitute, nor an explanation for how affordable housing goals will be met. Merely offering a breakdown of residential uses does not answer this question for the reader.
- 265 implemented, but the reader is left guessing which option(s) has been utilized. Discussion of high density housing, which is common throughout the document, is not a substitute, nor an explanation for how affordable housing goals will be met. Merely offering a breakdown of residential uses does not answer this question for the reader.
- 266 The Pardee Settlement Agreement is mentioned but not discussed. A description or explanation should be included as public information.
- 267 Add the following language (in quotation marks). Fencing along property boundaries should be designed and constructed of materials that are compatible with the open space corridors, AND "buried a sufficient depth to prevent edge effects (caused by people and animals digging under the fencing)."
- 268 When will the Habitat Management Plan be prepared? Will it be subject to public review? How will consistency with MSCP Table 3-5 be ensured?
- 269 On page 111 the EIR states that special management conditions apply including "minimization of edge effects (all), minimization of recreational use impacts (manzanita and ceanothus), and prohibiting collection and fire management (coast barrel cactus)." Fire management should be encouraged, not prohibited. Please reword/clarify this sentence which is unclear in its current form.
- 270 The EIR states that Third-Party Beneficiary status will be contingent upon "the permittee maintaining the biological values of any and all lands committed for mitigation pursuant to the permit and full satisfaction by permittee of mitigation obligations required by the permit." Will an annual audit/evaluation be conducted in order to determine if the permittee is fulfilling his/her obligations? Who will be responsible for monitoring whether obligations are being met? Will the evaluation be made public, or subject to public review? Some mechanism should be offered in the Final EIR to ensure compliance.
262. See response 205 to letter from Southwest Center for Biological Diversity.
263. See response 206 to letter from Southwest Center for Biological Diversity.
264. See responses 208 and 209 to letter from Southwest Center for Biological Diversity
265. See response 208 and 209 to letter from Southwest Center for Biological Diversity
266. See response 210 to letter from Southwest Center for Biological Diversity
267. See response 211 to letter from Southwest Center for Biological Diversity.
268. See response 212 to letter from Southwest Center for Biological Diversity.
269. See response 213 to letter from Southwest Center for Biological Diversity.
270. See response 214 to letter from Southwest Center for Biological Diversity.

Response

- 271 As a prerequisite we need to know if the plan as proposed in the MEIR is consistent with the language of the 1985 Managed Growth Initiative (Proposition A). Can the reader assume that because the plan is consistent with the Framework Plan it is also consistent with the Prop. A language? If so, this statement should be made in the Final EIR.

Hydrology/Water Quality

- 272 The Draft MEIR on page 223 recites a litany of adverse impacts from urban storm water runoff and concludes that pollutants carried thereby "could compromise the quality of downslope or downstream surface water and groundwater, affecting water quality both within Pacific Highlands Ranch and ultimately, ending up in the San Dieguito River and Lagoon, Carmel Valley, Los Penasquitos Lagoon, and the Pacific Ocean." Despite this statement the Draft MEIR concludes that "[t]he runoff of urban-generated pollutants is not considered significant (on a direct basis) due to the presence of existing regulatory controls and the anticipated incremental nature and extent of such pollutants, though the incremental contribution of urban pollutants would be cumulatively significant." Further, the Draft MEIR identifies a number of best management practices ("BMPs") but identifies only two new possible detention basins within the Draft MEIR. Figure 4D-3.
- 273 On what basis does the City assert that the application of existing regulatory controls would render the impact of urban-generated storm water pollutants insignificant? Pollution carried by storm water runoff regularly closes beaches and waterways after storm events despite the presence of existing regulatory controls. Therefore compliance with existing regulatory controls is not limiting or mitigating these impacts adequately.
- 274 Throughout the project, the storm drain infrastructure shows storm drainage emptying into natural drainages in the MHPA reserve. See Figure 4D-3. The Draft MEIR does not address storm water management practices at any of sites other than to say that "the exact number, size, design, and location of desiltation/retention basins will be determined in conjunction with future tentative map proposals" and in accordance with BMPs. Although it may be true that the construction details might be best addressed in tentative map proposals, the City has failed to provide overall project planning for storm water management.
- 275 The Draft MEIR's BMP list is quite brief and does not include recent developments in urban runoff control technology such as the system developed by StormTreat, the role of restored wetlands, oil separators in parking lots, low flow diverters, etc. Is the list on page 215 a list of all the BMPs available to the City? If so, why? If not, what is the entire list of BMPs? What guidance does City staff use when evaluating the appropriate implementation of BMPs? Given the likely increasing impacts on beaches as develop continues, the City needs to provide increased guidance on the use of BMPs so that communities are able to determine what the City will do to protect surface water quality. Mere reliance on a blanket statement about the use of BMPs is not sufficient for meaningful environmental review.
- 276 Further, given increased surface water impacts and increasing ocean pollution, the Draft MEIR's reliance on BMPs without evaluating the actual pollution impacts is not merited. The Sierra

271. See response 215 to letter from Southwest Center for Biological Diversity
272. See response 206 above and response 197 to letter from San Dieguito River Valley Regional Open Space Park.
273. Comment noted. See also responses to the letter from the San Dieguito River Park.
274. The City of San Diego has developed Best Management Practices (BMPs) pursuant to the NPDES requirements of the RWQCB which apply to development proposals throughout the city. These requirements would be implemented as tentative maps are processed within Subarea III to ensure that water quality impacts are mitigated.
275. Figures 4D-3 and 4D-4 conceptually indicate potential detention locations for Subarea III based on the concept grading studies completed for the project. Comprehensive drainage studies for the entire Subarea to refine the location and a determine sizing of these basins would be required.
276. See response 273 above

Sierra Club Comments on
Pacific Highlands Ranch Draft MEIR

Club requests that the City provide a plan for managing storm water runoff and associated pollution by:

- 277 1) Estimating water flows for each storm drain collection subsystem identified in Figure 4D-3 and estimating the anticipated pollution and siltation loadings for each of these subsystems.
- 2) Determining the impacts of the total Subarea III urban runoff on adjacent drainages and downstream waterbodies.
- 3) Developing a control and mitigation plan for the Subarea that identifies the best available control technology suited to each urban runoff source, including but not limited to storm water drain outfalls, parking lot drain outfalls, residential landscaping runoff, etc. These need not be identified as to a required technology type at a precise location, but rather would provide the Project Applicant with more policy guidance about the appropriate use of technology, and particularly with the use of newly developed technologies. Further, it would allow downstream communities to determine whether or not the City was doing its utmost to protect their water.
- 278 The Draft MEIR admits that the cumulative impacts of urban storm water pollutants from areas throughout the NCFUA would be significant yet does not attempt either in this document or in the Framework Plan to manage or mitigate for this cumulative impact. If the cumulative impact is significant, the City must address this concern at each level of planning by proposing actions appropriate to that level that will control or mitigate the cumulative impact. Has the City performed any NCFUA-wide studies evaluating cumulative urban runoff impacts? If not, the
- 279 Sierra Club requests that the City undertake such studies. In the mean time, the Sierra Club requests that the City manage and mitigate the urban runoff in Subarea III in accordance with the steps identified in (2), above.

Public Services/Facilities

The Draft MEIR has identified two neighborhood parks and one community park and has not provided for any neighborhood gardens adjacent to the village center. Further, the Draft MEIR indicates that Miramar Landfill will reach capacity by 2011, well within the buildout period.

- 280 Are neighborhood parks located within one half mile of the southern and western developments in this subdivision? Will the City provide for a neighborhood garden for village center residents who otherwise would not have access to gardening?
- 281 That Miramar Landfill will be at capacity in about 12 years even taking into account a 25% recycling diversion rate is troubling. After 2011, where will the City send its solid waste from Subarea III? This timeframe is well within the scope of the Draft MEIR. Has the City assessed the cumulative impacts of increase solid waste generation in the NCFUA? To the maximum extent possible the City should provide for recycling in new neighborhoods. What factors prevent the City from implementing curbside recycling in this Subarea? That curbside recycling is currently not provided is more an artifact of the undeveloped nature of the area and is not reason not to extend the system. Has the City made any provision for neighborhood recycling

Response

277. See response 275 above.

278. Significant cumulative water quality impacts are identified in the MEIR and the implementation of the mitigation measures required by the City of San Diego as individual tentative maps are processed would reduce the cumulative effect in the region.

279. This recommendation regarding NCFUA urban runoff studies is noted.

280. While a Village Center includes a Town Green/Public Plaza, a community garden is not proposed in the Subarea Plan for Pacific Highlands Ranch.

281. As described on page 360 of the draft MEIR, numerous solid waste reduction measures would be required as a component of a comprehensive solid waste management plan. These measures would include recycling facilities for multi-family housing.

Sierra Club Comments on
Pacific Highlands Ranch Draft MEIR

Response

centers? What regional systems exist for collecting recycling? The City provides waste generation rates for various generators. Page 358. What are the current corresponding recycling rates for these generators? Recycling storage is often problematic in multifamily housing. What requirements exist to incorporate recycling facilities into multifamily housing?

Water Conservation

The City 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 users. The City initially conditioned this Subarea to install reclaimed water facilities, and then later determined that the Subarea was outside the optimized service area. Further, the City merely voices support for proven water conservation strategies.

282. Why was this Subarea determined to be outside the optimized service area for reclaimed water after initially being considered to be inside this area? What is the status of the surrounding subareas? What factors affect this determination?
283. The Draft MEIR mentions that the developers may be required to incorporate recycling facilities into kitchens, but what about incorporating water conserving appliances such as washing machines?

Population

284. The Draft MEIR states that "[f]inally, following its adoption . . . , the Pacific Highlands Ranch Plan would itself define what would be the planned location, distribution, density, and growth rate of the population in the area." Page 383. The comment on page 383 related to the effect of the Pacific Highlands Ranch Plan defining distribution and density seems to imply that the developer can ignore the City's planning and environmental review processes. Please clarify the intent of this statement.

Thank you for this opportunity to comment on this important project. If this land is to be developed, it is the Sierra Club's hope that we will continue to work together to create the best possible development for this land, both for the remaining natural resources of the area and for the future citizens of this community.

Respectfully submitted,



Paul C. Blackburn
Conservation Coordinator,
Sierra Club, San Diego and Imperial County Chapter

Attachment

282. The City of San Diego reduced the scope of the optimized service area for reclaimed water distribution and as part of that determination there is no surety that a reclaimed water system would be provided to this portion of the city.
283. Several water conservation measures have been included in the draft MEIR (page 365), but this measure has not been included as part of the Subarea Plan.
284. This sentence has been clarified in the final MEIR.

Sierra Club Comments on
Pacific Highlands Ranch Draft MEIR

Response

ATTACHMENT 1
to
Sierra Club Comments
on
Pacific Highlands Ranch
Draft Master Environmental Impact Report

Response

SIERRA CLUB
San Diego Chapter

3820 Ray Street
San Diego, CA 92104-3623
619-291-5532

March 6, 1998

Lawrence C. Monserrate
Environmental Review Manager
Development Services Department
1222 First Ave., MS 501
San Diego, CA 92101-6620

RE: DRAFT REVISED ENVIRONMENTAL IMPACT REPORT (REIR); Middle
Segment of State Route 56, LDR NO. 95-0099, SCH NO. 9603039

Dear Mr. Monserrate,

The San Diego Chapter of the Sierra Club, after review of the above referenced REIR, recommends the adoption of the Modified Northern F Alignment for the middle segment of SR 56. The rationale for the adoption of this alternative route is based on the following considerations.

- 1) The Central Alignment is completely unacceptable because it travels directly through the center of the high quality habitat designated for the Multi-Habitat Planning Area (MHPA) of the Multiple Species Conservation Program (MSCP). This area is one of the largest single blocks of undeveloped coastal land still remaining in San Diego County. Studies have shown that the MHPA is habitat for the federally endangered California gnatcatcher and other regionally sensitive species also protected under the MSCP. The Central alignment would jeopardize and possibly violate the Implementing Agreement for the City's MSCP Subarea Plan.
- 2) The Modified Northern D and F alignments are designed to avoid habitat fragmentation of the MHPA and both alternative alignments mitigate possible impacts where they cross wildlife corridors by the construction of bridges over the corridors.
- 3) The Modified Northern F alignment does intrude on the northwestern edge of the MSCP, impacting about 22 acres more than the D alignment in the Expressway plan. This intrusion is not considered significant (Table 4.3-2) since it does not fragment habitat and does not enter areas with high concentrations of Sensitive Plant Species (Figure 4.3-2), Sensitive Animal Species (Figure 4.3-3) or Gnatcatcher Habitat and Sitings (Figure 4.3-4).
- 4) The Modified Northern D alignment bisects the central area of the planned Subarea III community where commercial, employment, mixed uses and higher density residential units are proposed, reducing the coherence of this central area of the planned community. The Modified Northern F alignment does not bisect this central area, keeping it as an integrated community.

Response

- 5) In the Modified Northern F alignment, the highway runs between the central community and the MSCP preserve, effectively isolating the wildlife from this high usage area and creating a well-defined demarcation of the MHPA. One concern is that sufficient barriers to wildlife be created along the southern border of the highway to prevent their entry onto the roadway.

As environmentalists we would prefer that no highway be built at all, but, given the projected population growth in this area, we wish to ensure a highway that preserves as much of our unique biological resources as possible while providing attractive and comfortable living conditions for our citizens.

Sincerely,

Janet A. Anderson, Chair
Land Use Committee

RECEIVED
MAY 08 1998
MEMORANDUM

DIOCESE OF SAN DIEGO



Construction Services

DATE: 05/07/98
TO: Eileen Lower, Environmental Planner, City of San Diego
FROM: Wm. Joel King, AIA,
Construction Services, Diocese of San Diego
SUBJECT: Central Catholic High School and Parish Church @ Pacific
Highlands Ranch Subarea Plan (North City Future
Urbanizing Area Subarea III)

On behalf of the Catholic Diocese of San Diego, the following comments are in response to my review of the Draft Master Environmental Impact Report dated 04/03/98 for Pacific Highlands Ranch Draft Subarea Plan with regard to Central Catholic High School and parish church:

- 285 1. Description of subject on cover sheet states " up to 5,456 units...". Table 2-3 of Subarea Plan states "... will not exceed 5,470 units ... ". Which is correct ?
- 286 2. Conclusions given at the beginning of the report should mention that the private high school will include a community parish church that will replace St. William of York on Del Mar Trails Road.
- 287 3. Section 5 and 8 of the executive summary should also mention that the private high school will include a community parish church that will replace St. William of York on Del Mar Trails Road.
- 288 4. The last paragraph on Sheet S-43 states that approximately 5,568 units (typo error?) would result without a phase shift. This is not consistent with the remaining text of this paragraph.
- 289 5. Figure 2-5 Ownership Map shows the wrong owner for parcel 305-030-19. This should be corrected to: "Roman Catholic Bishop of San Diego, A Corporation Sole".
- 290 6. Chapter 3: Project Description, Section J: Anticipated Future Projects should be modified as follows: "... a conditional use permit for a private high school and parish church on the 54 acre Catholic Diocese ownership, ... ".

Response

285. This final MEIR has been revised to reflect this comment.
286. Comment noted. The conclusions at the beginning of the MEIR are general and more detailed information on the private high school has been incorporated into the text of the EIR as requested.
287. This final MEIR has been revised to reflect this comment.
288. This final MEIR has been revised to reflect this comment.
289. The Subarea Plan will be changed for Parcel 305-021-11 to read Lin/Kasai.
290. This final MEIR has been revised to reflect this comment.

Response

2917. Chapter 4.B mentions a transportation analysis Appendix B. This was not included in our copy of the MEIR. We would be interested in reviewing a copy of this Appendix B.

2928. Chapter 4.B.f) Phasing Plan does not mention our project. Table 4B-11 shows our project occurring under phases D, F, & G. Table 4B-13 shows our project occurring under phases G, H, I, and J.

This raises several questions for us:

A. Why is our project shown as being built over several phases when it is our intent to construct the entire campus and church under a single phase beginning 2004 and occupy the school one grade per year beginning 2005.

B. Should our project be defined in terms of Equivalent Dwelling Units to address the low density underlying zone?

C. Does this phasing plan need to be modified to meet our schedule?

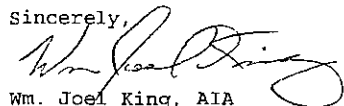
2939. Figure 4C-1 shows existing vegetation along the westerly boundary of our site. Table 4C-5 shows mitigation requirements for non-Pardee ownership for some of the same species of plants. Please clarify what portion, if any, of plants listed in 4C-5 are on our site. What will be our mitigation requirements?

294 Existing vegetation along the westerly boundary of our site is also in the location of the required equestrian trail. We plan on granting the land fee simple to the City for the trail. How does this impact the MEIR's proposed mitigation requirements?

Eileen, we would be interested in reviewing the Public Facilities Financing Plan (PFFP). The PFFP may answer some of our questions related to phasing and our participation in financing necessary public improvements.

We have reviewed the Draft Subarea Plan for Pacific Highlands Ranch and mailed comments to Cathy Winterrowd on April 29, 1998. If you have any questions on my comments, please call me at 224-8298.

Sincerely,



Wm. Joel King, AIA
Construction Services

cc: Rebecca Michael (Sullivan, Wertz, McDade, & Wallace)
Latitude 33

291. The transportation analysis (Appendix B) is available for review at the Development Services Department at 1221 First Avenue, Fifth floor, San Diego (236-6302), as well as at the Carmel Valley branch of the public library.

292. As shown in the Subarea III Transportation Phasing Plan the private high school is assumed starting in Phase E. The private high school is not phased. Other comments noted.

293. The vegetation communities listed on Table 4C-5 have not been calculated by ownership other than to separate out the acreages for Pardee and non-Pardee lands. However, a review of Figure 4C-1, Existing Vegetation, indicates that majority of the Diocese property is disturbed agricultural land. Any required mitigation would be determined at the time the Diocese submits a specific development proposal.

294. Mitigation in conformance with the ratios and standards set forth in the MEIR (see Tables 4C-4 and 4C-5) would be required as individual development proposals are brought forward. There would be adequate acreage and mitigation opportunities on site to reduce biological impacts to below a level of significance.

Response

Jeffrey H. Lin

6153 Wolfstar Court, San Diego, CA 92122
Tel: 619.457-1088 Fax: 619.457-2080

May 18, 1998

RECEIVED

Ms. Eileen Lower
City of San Diego
Development Services
LAND DEVELOPMENT REVIEW DIVISION
1222 First Avenue, MS 501
San Diego, CA 92101

MAY 1 1998
ENVIRONMENTAL ANALYSIS
SECTION

SUBJECT: PACIFIC HIGHLANDS RANCH (SUBAREA III) SUBAREA PLAN EIR -
PUBLIC REVIEW COMMENTS

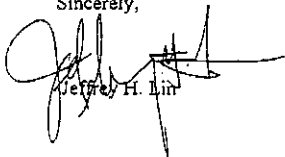
Dear Ms. Lower:

295 I am writing this letter of comment on the Draft Master EIR for the Pacific Highlands Ranch Subarea Plan as the owner of approximately 21 acres in the central portion of Pacific Highlands Ranch. For the record, I want to express my opposition to the land uses allocated to my property in Figure 8-7 of the Draft Master EIR, the Conceptual RPO Alternative Land Use. Specifically, this alternative designates all of my property for development of a senior high school. This land use designation is totally unacceptable to me.

295. Comment acknowledged.

Thank you for the opportunity to review the Draft Master EIR for the Pacific Highlands Ranch. As a property owner and respondent on the Revised EIR, I would request that I receive a copy of the Final Master EIR.

Sincerely,



Jeffrey H. Lin

Attachment: Figure 8-7, Conceptual RPO Alternative Land Use Plan (with property outlined)

cc: Cathy Winterrowd, Community Planning

S:\PLANNING\PROJECTS\HRS\JEIR.DOC

PR-124

* 21-acre Lin parcel

May 18 '98 09:58AM LETTERI-MCINTYRE & ASSOCIATES 619 238 9772

P.3/3

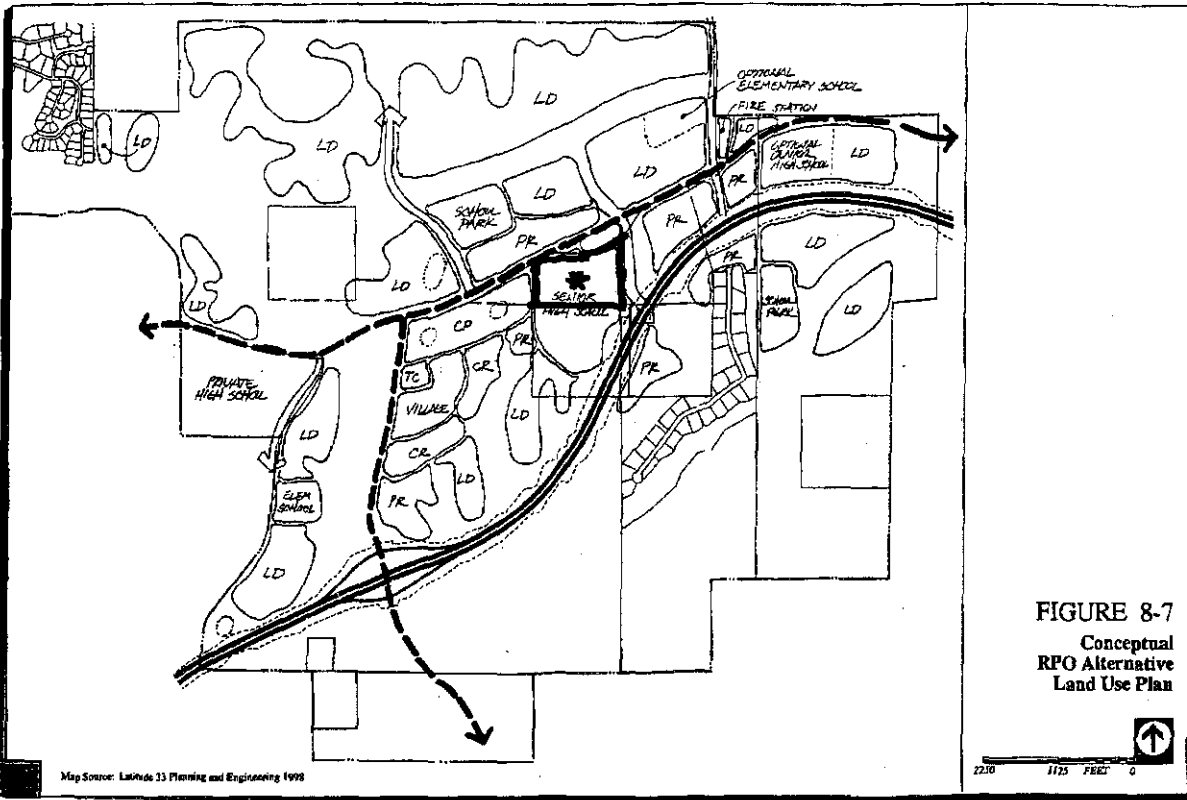


FIGURE 8-7
Conceptual
RPO Alternative
Land Use Plan

Response

Response

May 18, 1998

Eileen Lower
Environmental Planner
City of San Diego
Development Services
Land Development Review Division
1222 First Avenue, Mail Station 501
San Diego, CA 92101

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MAY 1 1998

ENVIRONMENTAL ANALYSIS
SECTION

Re: Draft MEIR for Pacific Highlands Ranch - Subarea III Plan LDR No. 96-7918

From: Cindy Kasai (APN 305-021-11 and 305-040-10)

Dear Ms Lower,

The following are our comments to the April 3, 1998 Draft Subarea 3 Plan document:

General Comment

296 The following Plan 1 graphics do not show the correct location of the north/south (100 foot wide) "Neighborhood Parkway." They are figures: 3-14; 3-16; 3-18; 4D-3.

Figure 2-5 Ownership Map

297 Prestige Estate Inc. is not the correct name for this parcel (305-021-11). It should be changed to read as Lin/Kasai.

Table 3-2

298 The "New Zoning Designations" do not match the ones shown on Figures 3-20 and 3-21.

Page 36 - Neighborhood Parkway Areas

299 The section states that the north/south neighborhood parkway for will be "shifted about 800 feet east of the alignment shown in the Framework Plan." This statement is not correct. The north/south parkway location is shown correctly in most of the figures (see Figures 3-9 and 3-11) and is in the approximate location shown in the Framework Plan.

300 This section should also state that in Plan 1 the north/south Neighborhood Parkway will shift to the south on the Lillegreen and Mondeck parcels if these parcels are purchased as part of the SR 56 right-of-way acquisition.

Page 36 - Open Space Overlook (Trail Heads)

301 This section should also identify the size of the trail heads.

Land Use Plan Exhibits:

302 It should be noted that the following figures do not accurately show the development bubble/ MSCP boundary for Lee Living Trust parcel 305-040-10. The development bubble should be larger. Although the development area misrepresented is small (approximately 4.5 acres) this may effect the acreage calculations shown for development area and MSCP. They figures that are effected are: 3-9; 3-11; 3-20; 3-21; 4A-5; 4A-6; 4C-4; 4C-5; 4E-4; 4E-5; 4E-6; 4E-7.

296. This final MEIR has been revised to reflect this comment.

297. The Subarea Plan will be changed for Parcel 305-021-11 to read Lin/Kasai.

298. Updated zoning maps from the Subarea Plan have been included in the final MEIR.

299. Comment noted.

300. The location of the north/south Neighborhood Parkway will remain as shown regardless of whether or not the parcels are purchased as part of the SR-56 right-of-way acquisition.

301. The location of the trail heads in the Subarea Plan are intended to be conceptual. The precise design and acreage will be determined as part of a discretionary permit.

302. The development plan indicating the development area and MSCP boundary was established using the official 1" = 800' scale MSCP map. No changes to the development area boundary are anticipated for parcel 305-040-10 at this time. Precise development boundaries and dwelling units will be determined at the time of a project's discretionary approval.

Response

May 18, 1998
Page 2 of 2

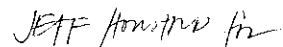
Land Use Plan Figure 8-6 :

303 The location of the PAL illustrated in this graphic is incorrect. The size and location should be similar to Figure 3-2.

303. Comment noted.

Again, we appreciate the opportunity to provide comments on the Draft MEIR document. Please contact me if you would like to discuss these items in further detail.

Sincerely,



Cindy Kasal
8333 Clairemont Mesa Blvd. 210
San Diego, CA 92111

cc: Cathy Winterrowd / City of San Diego - Community Planning

Response

April 28, 1998

To: Eileen Lower, Environmental Planner
Scott Vurbell, Associate Environmental Planner
Cathy Winterrowd, Senior Planner
Lawrence C. Monserrate, Environmental Review Manager
City of San Diego Development Services

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1. 1998

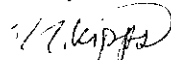
Environmental Services
13175 Caminito Mendiola

To whom it most concerns:

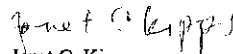
304 Upon studying the impact reports of the proposed SR-56 alignments, we find that Alignment "F" would be a DISASTER to our Rancho Glens neighborhood and surrounding areas, in terms of proximity (about 800 feet from Caminito Mendiola, and about 600 feet from Rancho Glens property lines!), with a permanent environmental impact of loud traffic noise echoing down Caminito Mendiola. This is extremely unfair to Rancho Glens homeowners, who purchased homes for the express purpose of the rural peace and quiet. Because our homes are right next to McGonigle Canyon, the closer the freeway alignment to our neighborhood, the more the loud freeway noise will ricochet and resonate from canyon to homes. Alignment F would be so detrimental to Rancho Glens homeowners that we ask that it be taken out of consideration NOW.

Please consider the tremendous and permanent deleterious impact Alignment "F" would have on Caminito Mendiola. We request that your decision show compassion to homeowners already in the area. It is imperative that you take Alignment "F" out of consideration NOW.

Sincerely,



Dr. Thomas J. Kipps
Head of Hematology and Oncology, UCSD



Janet C. Kipps
Housewife
13175 Caminito Mendiola, San Diego

304. Comment acknowledged. Please note that prior approval of Rancho Glens Estates did not preclude other development in the surrounding areas.

Response

Eileen Lower, City of San Diego, Development Services. Land Development Review
Division, 1222 First Avenue, MS 501, San Diego CA 92101

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PACIFIC HIGHLANDS DEIR

DATE: 1003

COMMENT #1

EXISTING HOMES AND BUSINESS

**THE DEIR UNDERSTATES THE ENVIROMENTAL IMPACT OF THE PROJECT ON
EXISITING HOMES AND BUSINESS IN THE FUA, PARTICULARLY WITH
REGARD TO THAT PROPOSAL INVOLVING THE PARDEE ALIGNMENT OF
SR56 (ALIGNMENT F)**

- 305 **THE PARDEE ALIGNMENT (F)**, and the subplan for Pacific Highlands
accompanying it destroys the most existing neighborhoods, private homes, and
businesses of any proposed. It ruins the investments and quality of life for all
existing residents in the Future Urbanizing Area.(FUA)

The only compelling reason to even study **THE PARDEE ALIGNMENT** with an
expensive DEIR is to unfairly shift all of the quality of life degradation of a freeway
to existing homes, businesses, and small property owners in the FUA for the benefit
of developers.

New residents to the FUA can choose to live next to a freeway, and alternatively,
developers can mitigate the adverse impacts of SR56 during construction. Existing
FUA residents have neither option without severe financial hardship. For them
noise, pollution, and scenic degradation can't be mitigated.

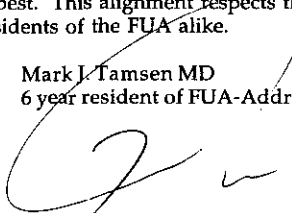
Existing home and small business owners in the FUA have already developed their
properties in obedience with all current zoning mandated by the voters. To favor
undeveloped, denuded, and idle crop land belonging to a high density developer
such as Pardee over existing residents is unfair and wrong.

**THE PARDEE ALIGNMENT RUINS MOST EXISTING HOMES, BUSINESSES, AND
NEIGHBORHOODS IN THE FUA.**

I agree with the City Engineering Department original recommendation that the
Central Alignment for state route 56 is the best. This alignment respects the
interests of both developers and current residents of the FUA alike.

cc: Susan Golding, Mayor
Harry Mathis, City Council
Randy Cunningham, Congressman
Howard Kaloogian, Assemblyman
Legal/Media Coordination Team

Mark J. Tamsen MD
6 year resident of FUA-Address on file



305. Comment noted. Please see response 304 from Thomas Kipps letter.

Response

Eileen Lower, City of San Diego, Development Services. Land Development Review Division, 1222 First Avenue, MS 501, San Diego CA 92101

PACIFIC HIGHLANDS DEIR

COMMENT #2

ESTIMATES OF HUMAN DEATH AND SUFFERING ARE OMITTED FROM THE DEIR. PACIFIC HIGHLANDS WILL CAUSE SIGNIFICANT NOISE POLLUTION, SCENIC DEGRADATION, AND AIR QUALITY DEGRADATION FOR ALL LOCAL FUA RESIDENTS AS WELL AS THE CITY OF SAN DIEGO.

The DEIR for Pacific Highlands understates the local effects on Rancho Glens Estates for noise pollution, scenic degradation, and air quality diminution. This is particularly acute with the Pardee Alignment of SR 56 (F) and the associated plans for Pacific Highlands.

306 Having interior noise thresholds of 69 dBA exceeded in Rancho Glens at all 16 homes tested with windows open (SR 56 DEIR page B-25) with the Pardee Alignment (F) of SR 56 is a significant impact that will be impossible to mitigate even with millions of dollars of added construction or compensation payments.

307 The DEIR also glosses over the significant air quality degradation for San Diego as a whole. There are estimates of up to 400 tons of added air pollution generated from the 38-50,000 new residents of Pacific Highlands and associated commuter traffic added to the existing 805/5 merger traffic. This traffic congestion and air pollution is in addition to the associated traffic and pollution of planned SR 56.

Air Quality degradation is particularly acute with any of the Northern Alignments of SR56 and associated plans for Pacific Highlands.

As a physician, I ESTIMATE THAT PACIFIC HIGHLANDS AND ANY NORTHERN ALIGNMENT OF SR 56 WILL CAUSE 50-100 HUMAN DEATHS PER YEAR FROM RESPIRATORY COMPLICATION DUE TO AIR QUALITY DEGRADATION. There will be added significant suffering for many asthma and other respiratory patients in the local San Diego area as well.

Mark J. Tamsen MD
6 year resident of FUA-Address on file
Homeowner Rancho Glens Estates

cc: Susan Golding, Mayor
Harry Mathis, City Council
Randy Cunningham, Congressman
Howard Kaloogian, Assemblyman
Legal/Media Coordination Team



306. This comment regarding interior noise impacts/mitigation described in the SR-56 EIR is noted.

307. The draft MEIR acknowledges that the development of Pacific Highlands Ranch would contribute to cumulatively significant air quality impacts within the San Diego Air Basin.

Response

Eileen Lower, City of San Diego, Development Services. Land Development Review Division, 1222 First Avenue, MS 501, San Diego CA 92101

PACIFIC HIGHLANDS DEIR

COMMENT #3

THE NORTHERN ALIGNMENTS OF SR56 AND ASSOCIATED PACIFIC HIGHLANDS PLANS ARE ENVIROMENTAL NIGHTMARES. THE PARDEE ALIGNMENT (F) OF SR 56 AND PACIFIC HIGHLANDS IMPACT VITAL WILDLIFE WATERING SITES CONTIGUOUS TO RANCHO GLENS AND MCGONIGLE CANYON.

The DEIR's environmental analysis and conclusions with regard to PACIFIC HIGHLANDS AND ANY NORTHERN ALIGNMENT OF SR 56 are flawed and should be corrected.

308 Independent analysis and study have concluded that the northern alignments are at least equally environmentally sensitive as the central alignment. When all planned interchanges and cross streets are built, the additional disruption of habitat by the northern alignments certainly exceeds that of the central alignment.

309 Furthermore, the DEIR does not even mention the large pond on the western edge of Rancho Glens Estates and McGonigle Canyon or the year round stream on the southern edge of the same community.

These are vital water sources for animal life including deer, coyotes, rabbits, migratory birds, and others. YES THERE ARE DEER HERE. I KNOW BECAUSE THEY ARE IN MY BACKYARD.

310 All Northern alignments of SR 56 add noise and light pollution that will certainly degrade the ability of wildlife to utilize these water sources contiguous to Rancho Glens. A high Density design/phase shift for Pacific Highlands will only add to this degradation.

In addition, many of the Pardee Pacific Highlands plans essentially surround these natural water sources and sensitive knatcatcher on three sides with noisy, lighted, polluting, freeway, and other development and thus hampers wildlife access to a degree that cannot be mitigated.

Mark J. Tamsen MD
FUA Homeowner for 6 years
Address on file

cc: Susan Golding, Harry Mathis, Howard
Kaloogian, Randy Cunningham, Legal/Media Coordination Team

308. Please see page 3 of the letter of comment on the draft MEIR for Subarea III from the USFWS/CDFG.
309. Although the precise location of these areas cannot be determined from this comment, both of these general areas would be within the MHPA open space area proposed under either Subarea Plan. Also, it is recognized that seasonal variations within riparian zones occur from year to year. The vegetation mapping presented in the MEIR regarding these locations is considered representative of the habitats present.
310. Indirect impacts (e.g., noise and lighting) associated with the proposed Subarea Plans are addressed in the Biology section of the MEIR on pages 193-195 and are considered significant.

Response

Eileen Lower, City of San Diego, Development Services, Land Development Review
Division, 1222 First Avenue, MS 501, San Diego CA 92101

PACIFIC HIGHLANDS DEIR

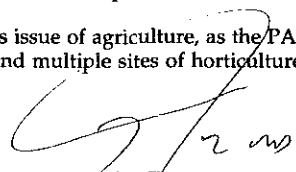
COMMENT #4

**THE AGRICULTURE IMPACT OF THE PLAN WILL BE SIGNIFICANT AND
UNMITIGATED**

The DEIR wrongly minimizes the agricultural impact of the project.

- 311 We assert that this land indeed qualifies as Prime Farmland as defined by the California Department of Conservation in direct conflict with the statements contained in the DEIR concerning agricultural impacts.

The DEIR needs to be corrected on this issue of agriculture, as the PARDEE Project destroys at least 3 working nurseries and multiple sites of horticulture.



Mark J. Tamsen MD
6 year resident of FUA-Address on file

cc: Susan Golding, Mayor
Harry Mathis, City Council
Randy Cunningham, Congressman
Howard Kaloogian, Assemblyman
Legal/Media Coordination Team

311. Comment noted. However, the draft MEIR on page 317 indicates that direct and cumulative impacts to agricultural resources are significant and unmitigated.

Response

Eileen Lower, City of San Diego, Development Services. Land Development Review
Division, 1222 First Avenue, MS 501, San Diego CA 92101

PACIFIC HIGHLANDS DEIR

COMMENT #5

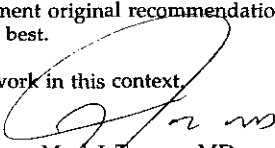
**THE BIOLOGY IMPACT OF THE NORTHERN ALIGNMENTS OF SR56 WILL BE
SIGNIFICANT AND UNMITIGATED**

The DEIR wrongly concludes that biology impact of ANY northern alignments of
SR56 and associated Pacific Highlands plans can be mitigated.

- 312 Independent study of the northern alignments have demonstrated that they are
equally or more environmentally sensitive than the Central Alignment and cannot
be mitigated. This study is available for review by city planners in making their
corrections.

I agree that the City Engineering Department original recommendation for the
Central Alignment of state route 56 is the best.

The plans for Pacific Highlands need re-work in this context.



Mark J. Tamsen MD
6 year resident of FUA-Address on file

cc: Susan Golding, Mayor
Harry Mathis, City Council
Randy Cunningham, Congressman
Howard Kaloogian, Assemblyman
Legal/Media Coordination Team

312. Please see page 3 of the letter of comment on the draft MEIR for Subarea III from
the USFWS/CDFG.

Response

Eileen Lower, City of San Diego, Development Services. Land Development Review
Division, 1222 First Avenue, MS 501, San Diego CA 92101

PACIFIC HIGHLANDS DEIR

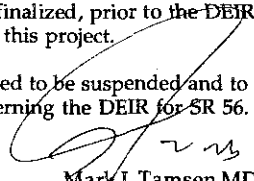
COMMENT #6

**THE APPROVAL OF ANY DEIR FOR PACIFIC HIGHLANDS MUST SUSPENDED
PENDING AN APPROVAL OF A FINAL DEIR FOR SR56 ALIGNMENTS.**

WHAT IS THE RUSH??

- 313 A DEIR for this community cannot be finalized, prior to the DEIR of SR 56 which is a major component of the FUA and of this project.

The DEIR Plan for Pacific Highlands need to be suspended and to be re-worked pending resolution and litigation concerning the DEIR for SR 56.


Mark J. Tamsen MD
6 year resident of FUA-Address on file

cc: Susan Golding, Mayor
Harry Mathis, City Council
Randy Cunningham, Congressman
Howard Kaloogian, Assemblyman
Legal/Media Coordination Team

313. The EIR for the SR-56 project has been finalized. It is anticipated that the San Diego City Council will review and consider the final EIR at a hearing on June 30, 1998. While the MEIR for the Pacific Highlands Ranch Subarea Plan can be finalized and certified with or without the certification of the SR-56 EIR, it should be noted that the Subarea Plan cannot be implemented until the SR-56 alignment is chosen.

Response

March 18, 1998

Eileen Lower
Environmental Planner
City of San Diego
Development Services
Land Development Review Division
1222 First Avenue, Mail Station 501
SAN DIEGO, CA 92101

RECEIVED

MAR 19 1998

CITY OF SAN DIEGO
DEVELOPMENT SERVICES

RE: PACIFIC HIGHLANDS RANCH (SUBAREA III) SUBAREA PLAN in the NORTH
CITY FUTURE URBANIZING AREA (NCFUA)

Dear Ms. Lower,

The following letter is to protest the Subarea III plan proposed by Pardee
Constructin Company.

I. Existing Traffic Congestion.

At the present time, the I-5/805 junction is a commuter's nightmare. During
rush hour, the commute from downtown to the Carmel Valley exit takes more than an
hour. On Friday afternoons, Northbound traffic on I-5 and 805 starts to back up from La
Jolla Village Drive at about 2:00 p.m. and commuters are gridlocked for hours at a
time. Southbound traffic on I-5 and 805 fairs no better. Traffic crawls at the peak hours,
and commuters are stuck in traffic jams with no way out.

- 314 Pardee is planning to build 5,456 new residences in Subarea III. It is estimated
that there will be at least 38,000 new residents in Pardee's new development. In
addition, Caltrans estimates that after completion of SR56, at least 10% of I-15 traffic
will be diverted to I-5 and 805. Creating such additional traffic congestion on already
gridlocked freeways is irresponsible and poor planning by the City of San Diego. A
moratorium is required on the building and development of any new communities near
the I-5/805 junction until the City addresses and resolves the enormous traffic issue
which will only be aggravated by the completion of SR56.

II. Unfair Location of Objectionable Projects on Existing communities of Rancho
Santa Fe, Rancho Glens Estates and Rancho Santa Fe Lakes.

314. The traffic report for Subarea III contained an analysis of both I-5 and I-15. Based
on the analysis, improvements for I-5 and I-15 were identified and are shown on
Table 24 of the traffic report.

Response

II. Unfair Location of Objectionable Projects on Existing communities of Rancho Santa Fe, Rancho Glens Estates and Rancho Santa Fe Lakes.

- 315 Pardee plans to build a fire station, a welfare housing project, a high school, junior high school and an elementary school within the area of these communities, at some distance from Pardee's Pacific Highlands development. Why should established, beautiful communities bear the brunt of providing Pardee's development with unwanted and undesirable buildings/ services when they benefit Pardee's project?

We propose that Pardee provide these services and house them near the towncenter of Pacific Highlands and away from million dollar residential estates.

III. Unfair Process: Failure to provide Notice to Residents Who will be the Most Adversely Impacted.

- 316 The president of the League of Women Voters, at the hearing of the San Diego Planning Board Commission on May 7, 1998, stated that the planning of Subarea III by Pardee is an example of the democratic process. This is false. Rather, it was a most unfair process as those most affected were not advised or notified of Pardee's plans until well after it was too late to provide any input to their decision.

None of the residents of Rancho Glens Estates were notified of the fact that Pardee was planning to put walking trails in our backyards. Neither was our input sought to identify and locate the sites for the public service buildings and welfare housing units within our community. This is not an example of the democratic process. This is an example of a wealthy, powerful corporation manipulating residential property owners solely for Pardee's financial interests. Pardee has acted without any regard or concern for these owners' property rights.

IV. Pardee's Alignment of SR56, the "F Alignment," is Unfairly Burdensome on Existing Communities.

- 317 It is preposterous to plan a four lane freeway next to existing communities of million dollar homes merely to protect future communities, one of which has not even been approved by voters yet. The prospective residents of Pacific Highlands and Seabreeze Farms have a choice. They can choose to buy a home next to the freeway or, if this is objectionable, they can buy elsewhere in an area not near SR56. Also, the new community could be planned, with the new freeway in mind, such that the new community is minimally affected by it. Unfortunately, the residents of Rancho Glens Estates and Rancho Santa Fe Lakes have no choice. When we bought our homes we relied on the Framework Plan from the City which apparently misrepresented that there would only be 1 home per 4 acres and more importantly that SR56 was so far away (Deer Canyon) that we never even considered it an issue. Now, after having relied on this information and using our life savings to buy beautiful homes in the peaceful setting of the country, we find we were not told the truth. Due process and

315. This comment regarding the location of land uses under the proposed Subarea Plans is noted.

316. See response 178 to the letter from Rancho Glens Estates Homeowners Association.

317. This comment on the several alignments of SR-56 through Subarea III is noted.

Response

and Pardee's Pacific Highlands development without considering the property rights and Constitutional rights of residents within the area. Continuing to steam roll over the rights of existing property owners will not work to anyone's advantage. On the contrary, it will result in costly and extended litigation and bad publicity for Pardee and the City.

Very truly yours,


Silvia O. Tamsen, Esq.

Response

7015 Vista Del Mar Ave, La Jolla, CA 92037 April 30, 1998

Mr. Lawrence C. Monserrate, Environmental Review Manager
Development Services
Land Development Review Division
1222 First Ave, MS 501
San Diego, CA 92101

Dear Mr. Monserrate: Re Pacific Highlands Ranch MEIR, SCH # 97111077

Thank you for sending me the referenced report for comment. In my opinion, it is certainly adequate for the purpose intended, although it is so long that it tends to obfuscate the issues involved. My comments are as follows

GENERAL COMMENTS.

- 318 In my opinion, the number of dwellings, and hence traffic, proposed under all the phase shift plans is very unwise when one considers that I-15 and I-5, aaaaaaaas well as several intersections, are already operating at unacceptable levels during peak use hours. Therefore, I recommend RPO alternative or, if the Phase shift is not approved, non-phase shift Plan 1 Alternative which would reduce the "non-mitigated" impacts listed on Table S-2 from 8 to 4. It would also reduce the automobile trips per day (ADT) from 80,000 to 40,000, a much more realistic number..

SPECIFIC COMMENTS

Trails:

- 319 The Multi-Use trail shown in Figs. 3-10 & 3-11 *should be divided by a split rail fence to separate the equestrian section from the hikers/bikers.* Such a divider has been used very successfully in the adjacent Carmel Valley Restoration and Enhancement Project, as shown in Encl. 1.

318. Comment noted.

319. This recommendation regarding fencing for the multi-use trail is noted.

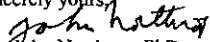
Response

Geology/Soils/Erosion

- 320 (A) Scripps Formation (Tsc) page 291, add "The Scripps Formation also contains some thin bedded shale layers that are considered expansive soils." (see Ref.1)
- 321 (B) The symbols for Geologic formations (Tt, Tsc,Tf etc) in Figures 4H-1. 2, & 3 are fuzzy and illegible in most cases. I suggest that these Figures be color coded, as most Geologic maps are, using the same color code as in Ref.1, i.e. light blue for Tt, dark blue for Tsc, green for Tf etc..

Thank you for your consideration in these matters.

Sincerely yours,


Dr. John Northrop, PhD

Consulting Geophysicist

Enclosures

Encl. 1, Photograph of the fence dividing the Carmel Valley trail for horses (on the right) and hikers, joggers/ bikers (on the left). Looking West. Stevens house in left background, riparian corridor on right.. Horse, BANDIT. Photo by Northrop, fall, 1997.

References.

Ref.1., Kennedy, M.P. (1975) Geology of the San Diego Metropolitan Area, California, Bull. 200, Cal, Div. Mines and Geol, Sacramento, CA .

320. Comment noted.

321. Figure 4H-1 in the MEIR is taken from the geotechnical report prepared for the project and larger scale representations of the map are included in the geotechnical appendix to the MEIR.



Response

PR-140

Response

To: Mr. Lawrence C. Monserrate
Environmental Review Manager
City of San Diego
Development Services
Land Development Review Division
1222 First Avenue, Mail Station 501
San Diego, Ca. 92101

R E C E I V E D

MAY 10 1998

ENVIRONMENTAL ANALYSIS
SECTION

From: Mr. Robert D. Barczewski
Rancho Del Sol Nurseries, Inc.
Zero Energy Systems, Inc.
Trustee, Barczewski Family Trust
6561 Black Mountain Rd.
San Diego, Ca. 92130

Re: Subarea III phase shift, Draft MEIR

Dear Mr. Monserrate:

This will be my third response to the proposed phase shift of Subarea III by the applicant, Pardee Construction Company. Due to the extreme negative impact to Rancho Del Sol, the land owned by the Barczewski Family Trust, Robert D. Barczewski, Trustee (under Declaration of Trust dated 8/10/77), this written response is lengthy and many issues are addressed. Also included is a brief history of the land.

I attach herewith our previous correspondence, copies of the Rancho Del Sol PRD permit, Planning Commission Resolution, Tentative map, a memo from Cathy Winterrowd to Randi Coopersmith and other pertinent documents. Since the various open space easements, the EIR, my 4/85 application for a GPA (Zero Energy Project), State of California permits, Recorded Rancho Del Sol Subdivision map 12477 are voluminous and on file with the City I

Response

will not include them here. Also my written comments to you on Route 56 will not be included here although I will be referring to them.

A brief history of Rancho Del Sol and the FUA follows:

The Mendiola family ran a fleet of Spanish galleons out of Mexico for a couple of hundred years and supplied Pueblo San Diego with arms, munitions and provisions. We are descendants through my mother Beatrice Mendiola. The "Jupiter Cannon" at Presidio Park was brought over by one of our ancestors. Therefore, the name of the street Caminita Mendiola.

Don Cordero, a retired soldier who was garrisoned at Pueblo San Diego was the first rancher (sheep, cattle, etc.) and eventually owned most of the area. Via a Mexican land grant he acquired this land, which included Del Mar. He managed to maintain a small part of his ownership after the Bear Flag Republic. After 1846 and the Gold Rush came the McGonigles, Neimans, Hampes, Zurchers, and others who dry farmed the land. In 1886 Old Black Mountain Road was established and became the dividing line of land ownership. Several of their descendents live locally and are active in the agriculture business. After W.W.II the Barczewski came back to San Diego from the Philippines after four years in Santa Tomas as POW's. Then came the Ukegawas (tomato growers), Collins (Evergreen Nursery) and myself (Rancho Del Sol and Nursery).

In 1962 a moratorium was created in the area. John F. Kennedy and Bobby Kennedy had the County place a moratorium on al property owned by the Teamsters Union (and others), who at that time was controlled by Jimmy Hoffa, and other lands owned by the Las Vegas group including Morris Shenker, etc. All this was done to stop the development from

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easterly Penasquitos to Del Mar. During this time the original alignment of Route 56 was established.

In 1964 the City of San Diego annexed the land and promised A-1-1 zoning. In 1971 easements were granted to the City of San Diego for the Del Mar 30" water line and the McGonigle canyon 18" sewer trunk.

In 1974 the City filed a general plan and placed a moratorium on the land, only allowing A-1-10. And denied A-1-1. Around 1982 clustered residential densities of one acre minimum size were allowed with 3 acres to be placed in an urban reserve (City Council Policy 600-29). On November, 1985 proposition A was voted in to stop Pardee Construction Company and others from further encroaching on the FUA (North-City-West, Fairbanks Village, portions of Penasquitos, etc.). The general plan scheduled the FUA to be placed into planned urbanizing by 1992 without a City-wide vote.

In 1992 the City Council adopted a framework plan of which we were not notified as we were in the Northwest "horsing around", attending Gonzaga University (R. Christopher Barczewski) and starting up a horse ranch. I attended all previous meetings in 1991 and early 1992 and was assured that Density Transfer Rights (Residential Dwelling Units) would be given to those who had ownership in the "Environmental Tier". This did not take place and without our knowledge and consent, the environmental tier evolved into MSCP.

The Specific History of Rancho Del Sol is as follows:

- ♦ 1975 Started looking at the Deseret Trust property
- ♦ 1979 Purchased 264 acres. The entire property was leased to the Ukegawa Tomato Growers. All but the steep slopes, gullies and creek beds were being farmed. Prior to the

Response

close of escrow over 800 migrant farm workers were camping in several areas of the land and adjacent. And a condition of the close was for their removal from the land.

Although they were moved, they returned and formed several camps in the various Arroyos.

- 1982-83 Settled the land and built the compound called "Fort Apache" which included a 3 wide mobile mobile-home. Started growing trees and planting them on some of the perimeter. Farming operations continued. Executed a Parcel Map and temporarily realigned Black Mountain Road at the insistence of neighbors and Deseret Trust. Convinced the City Engineers that part of the (present day) alignment would only be temporary and was a vast improvement over the existing old Black Mountain Road. He was concerned about the S curve and prophesized vehicle accidents. These did occur over the years and there are two very serious accidents and a couple of deaths. I promised that the road would be aligned along the Del Mar Pipeline easement and this I intend to do.
- 1981 The last great El Nino took out McGonigle Reservoir. Apparently the spillway was filled by dirt causing the dam to be breached. The creek bed and banks contained the water and the fringe area did not flood. In Deer Canyon the reservoir filled up and its spillway became a 20-ft. deep crevasse. A landslide occurred on Santa Monica Ridge. This was caused by benching or terracing the north slope next to the sewer main and lake. The slide is at the saddle of the ridge on the east end of Lot 1.

Great fires whipped up by Santa Ana Winds from the East have occurred in the past at a frequency of one large fire every ten years and smaller ones every five years. The two large ones that I witnessed was in late 79 and November of 1989. These Santa Ana grass and brush fires cannot be controlled once started and become wild with speeds up to 40 knots or so. Columns of flame, over fifty feet high, were common. I participated in the

Response

fire fight of 89 and let me tell you, it was frightening; watching fire trucks racing away from it at 35 mph on the agriculture roads. We commandeered two D-8 bulldozers and dozed brush and fire breaks wherever we could. The Ukegawa dozers and crew appeared to the East of Fort Apache and cleared large areas of brush and weeds. Zurcher dispatched his dozer and large discs to Lot 31 and created large firebreaks around the Mondeck property and Lot 31. We went up Santa Monica Ridge and dozed what we could and was forced back down the ridge road. Fortunately 20 acres of Lot 1 was previously disced and ready for farming. The fire jumped up Santa Monica Ridge east of Lot 1. Deer Canyon, Cordero ridge and canyon exploded into a very large high intensity fire and continued west at high speed incinerating every thing in sight. The fire was totally out of control burning through the night. The next day the Santa Ana winds came back and whipped it up and headed at high speed to Palacio Del Mar. Helicopters with five-hundred gallon buckets ferried water from the Deer Canyon reservoir. The fire was finally stopped at Palacio Del Mar. At the time, everyone thought that it would burn through to the ocean. I have videos of this episode.

This October or next we expect a big one (1998 or 1999). We have had the big rains and therefore grass, weeds and brush will be quite overgrown and ready to fuel a much larger fire than the fires of 79 and 89. This time we have a large problem. The Deer Canyon reservoir is gone. Where will the helicopters get water for the next Santa Ana fire fight? Fortunately, I installed two fire hydrants at the toe of Santa Monica ridge at both ends of Lot 1 and all the way up Caminito Mendiola and Rancho Santa Fe Farms road to Black Mountain. We have disced all areas possible. Zurcher and Ukegawas farming operation has taken care of all the land surrounding the Rancho Del Sol PRD. Unfortunately, not much has been disced between Santa Monica Ridge and Del Mar Mesa. Due to the situation, I foresee a very high fire risk for Del Mar Mesa. We only have as of this

Response

writing less than four months to prepare and make repairs to the reservoir or create a new one. There are several residential developments that are in danger.

- April of 1985 filed an application for GPA. I proposed an alternative development project employing alternative architecture for commercial, condos, apartments and estate residential. I employed Cal Poly School of Architecture, Rocky Mountain Institute, and others. Created computer models, and made determinations of our microclimate. Obtained year around climate data and ran computer simulations to prove the feasibility of the various Zero Energy structures that we had designed. Identified microclimate and southeast facing slopes to be a major energy resource for stand alone heating and cooling. Identified the southeast facing slopes of Santa Monica Ridge as being the most prime followed by Cordero Ridge and McGonigle Canyon (Lot 31 and most of the lots in Rancho Glens Estates). Specific architecture and models for Lot 1 and Lot 31 were developed and constructed. My project was transit oriented employing water conservation and recycling, alternative landscaping and grading. This application is on file with the City and is a very serious demonstration development proposal. It has been on hold since 1985 as a result of Proposition A. The application only proposed a demonstration project on about 30-acres. Of the 264-acre parcel on where Rancho Del Sol Nursery is presently located. A mix of commercial, condos, apartments, office buildings, and single family structures was to be constructed and demonstrated to the City and State.
- October 1986 City approval of the revised Rancho Del Sol Subdivision tentative map and Planned Residential Development. EIR completed and certified.
- July, 1987 Established Rancho Del Sol Nursery
- July, 1989 Sold Parcel 2 (40 acres) to Cindy Kasai.

Response

- October, 1989 Recorded Rancho Del Sol Subdivision map 12477 and PRD. Initiated development. Sold 29 PRD lots to Duriso, Inc. Retained Lots 1 and 31 of the PRD. CC & R's established. HOA named Rancho Glens Estates.
- July, 1993 Expanded Rancho Del Sol Nursery into a full fledged nursery with 1 acre greenhouse, etc., etc.
- 1996 Revised planning as a result of Route 56. Boundary dispute with Rancho Lakes.
- 1998 Deer Canyon reservoir-dam collapsed. Planning revisions for additional Route 56 alignments. Pardee's phase shift proposal and impacts to Rancho Del Sol. Responded to Route 56 Draft EIR's. Assessment of impacts to Rancho Del Sol due to Route 56 and Pardee Construction Company's proposed phase shift plans.

General Comments

I am appalled at what is being proposed by this ill-fated Master EIR. In my opinion, it is promoting violation of the U.S. Constitution, the State of California Constitution, various County and City Ordinances, municipal code, City Council policies, the general plan and even the general concept of the Future Urbanizing Area. Over the years, the City has managed to whittle away at rights of property owners, particularly small property owners with limited resources. Limiting their freedom by overlaying layers of adopted plans such as the FUA General Plan, the adopted framework plan and lately, the City's adoption of the "MSCP" and establishment of "MHPA" preserve boundaries. The latter has become a great concern to myself as it has to many others. The taking of farmland and converting it to habitat has caused a massive problem in the area surrounding Rancho Del Sol, a very high probability of reoccurrence of Santa Ana Wind wild fires such as that that occurred in 1979 and 1989. I predict a similar fire this year or next year (October through December). Therefore, the MSCP/ MHPA plan/ concept is not only a taking of land but is endangering

Response

the health, safety and welfare of our rural community and endangering private property. Smoking cigarettes is safer than being in the MHPA. I am an environmentalist, but only to the extent that private property rights, agriculture/ farming rights, health, safety and the welfare of others are not violated.

Now that I have got this of my chest let us cut to the chase.

322 1. The City of San Diego has failed to notify Sandra L. Barczewski, Trustee (UDT 1984), Zero Energy Systems, Inc. and Robert D. Barczewski, Trustee (UDT 1977) - Landowners, of:

- a. City Council hearing on the Framework Plan
- b. MSCP/ MHPA
- c. Pardee's phase shift application of 1994 (we were thrown in it and not notified).
- d. Pardee's deals with the City

In 1991 and early 1992 I attended all the workshops concerning the FUA and the environmental tier. The City staff assured me that there would be density transfers and preservation of agricultural land. It would be similar to Marin and Sonoma county. This has vanished. Thinking that this was the plan and that we would be appropriately compensated for "the take" we went to the Northwest to establish a horse ranch and to attend Gonzaga University (R. Christopher Barczewski). As a result we did not receive notices so that we could defend our land and land values.

323 2. No where is there even a mention of the Rancho Del Sol Subdivision and it's PRD. Please refer to the attached maps. This was recorded on October 18, 1989 along with a certified EIR. As such, the MEIR is flawed and is violating City Ordinances and Municipal code. The negative open space easement grants to the State and the City does

322. The referenced background material does not address the adequacy of the MEIR, and has not physically been included in the final document. However, it is incorporated by reference into the final MEIR, and is on file (see LDR No. 35-0414) and available for public review at the offices of the Land Development Review Division, 1222 First Avenue, Fifth floor, San Diego, California 92101.

323. Notification for the public hearings on the Framework Plan, the MSCP, and proposed phase shifts was done according to local and state requirements.

Response

not allow any public access (trails, etc.). Rancho Glens Estates is the name of the Home Owners Association. The PRD and open space easements are off limits to the public.

324 3. There is no mention of my General Plan Amendment application of April, 1985 which was put off calendar as a result of the enactment of Proposition A, a few months later. My proposal for the Zero Energy Project still stands. Even with my limited resources, we spent over \$350,000 in this endeavor. Sometimes I relate myself to John Reardon in Ayn Rand's "Atlas Shrugged". As a result of Prop A I then modified the approved tentative map and finally executed the existing subdivision map and PRD in order to pay off the mortgages.

325 For Years we have identified the need for some commercial and mixed use on the northern property. This has been our input to Latitude 33/ Pardee, the City and especially during the 1991 workshops. The northern land is adjacent to the County estate lot development area and we consider ourselves to be in the sphere of the San Dieguito Planning area. They have been already identified the need in the area for office buildings, some commercial and mixed use. Our land is the only thing around that would fulfill this need. This would be somewhat similar to the Rancho Santa Fe Village except for the alternative architecture, TOC and indigenous landscaping.

326 Of great value is my discovery of the southeast facing slopes of Santa Monica Ridge, Cordero Ridge and Lot 31. Can you fathom the value of a residential or commercial structure that heats and cools itself without gas or electricity, year round for a hundred years or so? This was validated by the Cal Poly School of Architecture using models and microclimate data in their computer simulation studies. Results of these computer runs were presented to the City of San Diego with my GPA application. This has to do with mitigating global warming. The MHPA proposal would foreclose this tremendous asset.

324. The title of the approved Rancho del Sol subdivision and PRD is acknowledged. However, throughout the MEIR and Subarea Plan the subdivision is referred to as the project name of "Rancho Glens Estates." Please see Figure 2-3. Figure 2-5 identifies the parcel as the Barczewski Subdivision and also shows the Zero Energy System parcel. The remainder of this comment regarding the prohibited public access to various open space easements is acknowledged.

325. The status and history of the referenced General Plan Amendment application of April 1985 is acknowledged.

326. These comments regarding the preferred land use designations for the ownership is acknowledged.

Response

By the way, I was a consultant to the National Center for Atmospheric Research (Boulder) and the Desert Research Institute (Reno) during the period 1967 through 1972.

327 I worked for Drs. Telford, Squires and Kellog (NCAR) who were then conducting flights through hurricanes and thunderheads with various kinds of aircraft and attempting to model the earth's atmosphere in their computer programs and powerful computers. Dr. Kellog is the Chief person who identified Global Warming. My job at the time was to apply very sensitive instrumentation and classified space, missile and avionics systems and data to their flying laboratories. I learned much from these talented gentleman and applied this knowledge to alternative approaches to residential and commercial structures and began the search for land that would accommodate zero energy structures. Rancho Del Sol was it. Several years later I raised enough money to purchase the land in 1979. After constructing a passive solar house, with other alternative features, in Palos Verdes Estates and living in it for a few years, I moved the family back to San Diego, "Lock, Stock and Barrel". I quit the Aerospace Corporation, terminated my consulting business, custom home building company, sold out my land holdings in Palos Verdes Estates, two restaurants and a commercial fishing boat and settled on the land. I designed a 3 wide mobile home, had it constructed and installed a wind/ solar power station (independent of SDGE) to power the house. This became my real time living laboratory for the next two years. During this time I performed independent research and measurements and formulated the Zero Energy Project and alternative transit oriented community. The City then was interested in stopping any development in the FUA. All my efforts "went to hell in a hand basket" as a result. No one in City Hall listened or was interested. They were too engrossed in stopping development. The end result became the existing PRD which by the way was the first. The only person in opposition was Pardee Construction Company due to their land holdings to the North, East and West. In order to mitigate the influence that they had with City Staff I had to sue the City to eliminate the unfair and

327. Comment acknowledged.

Response

costly conditions that were placed on the Rancho Del Sol Subdivision. Other first in the FUA are (1) Certified EIR, (2) Fish and Game Permit, (3) State of California Coastal Commission Permit. I will never forget the time when the Fish and Game warden came out to give me my permits. She said that I was the first to ever apply for one before the fact. She told me stories about incidents with Pardee and others, including the City- more or less indicating to me that there had been an ongoing battle and infractions. Mind you, this was in 1986. Subsequent to this time, there have been other major incidents. No wonder that the City and Pardee are experiencing major problems with F&G and Coastal. What bothers me is that citizens such as ourselves are paying for the sins of the past. There definitely exists a polarization between the governmental agencies.

329 After Prop A and approval of my last tentative map and PRD (1986) it was suggested by various planners (City included) to offer the property to Pardee or to have Pardee pay for the cancelation of the PRD. Pardee declined. Several times we have proposed to Pardee boundary adjustments and land swaps- Again they declined. A month ago I made another attempt on the East boundary. Again they declined.

330 4. Proposed MHPA – Please refer to my correspondence of 3/3/98 to the City Attorney's Office, 3/1/98 to Pardee and Latitude 33, 5/1/98 to the Planning Commission.

Of the 156 acres in the Barczewski Family Trust, 146 acres or 93.6% of our land is proposed for contribution to the MHPA. This is not acceptable and will not be allowed for various reasons. Please refer to the Rancho Del Sol Map.

a. The 6.5 acre parcel (2 tax assessor parcels) to the east of the PRD is developed and zoned A-1-10. The finger canyon or gully was filled with compacted dirt and contains a 10-inch commercial sewer line and public utility easement. On the east boundary

328. Comment acknowledged. The Zero Energy Project parcel (305-021-16) is identified on Figure 2-5 of the EIR.

329. Comment acknowledged.

330. Comment acknowledged.

Response

there is a 1,000-ft long Negative Farming open space easement. We are farming this parcel and have planted ornamental trees, shrubs and ground cover (mother stock) for the nursery. We are also using it for soil mixing and will be utilizing it for our thoroughbred horse breeding stock. Both of Pardee's plans show this as part of the MHPA when in fact the MHPA and the MSCP show this property developed and not part of the MSCP. 4.5 acres are affected. None of this property is in the coastal zone.

- 331 b. Lot 31, 10.3 acres, is in the PRD boundary and is currently zoned A-1-10. 2 acres of it are overlaid with a negative biological easement granted to the City of San Diego. It is not in the coastal zone. Except for the Biological easement it has been extensively farmed and graded. In the past there have been several fires and much of the gentler slopes have been bulldozed for fire breaks. It contains an 8-inch water line and 8 inch sewer. Planning of this property is for high density residential at the top and estate residential at the bottom. The estate residential of 7 one-plus acre lots can be accomplished (A-1-1) and would become a part of the PRD. It has access (60 ft strip of land) to the private street. Currently, no public access is allowed (PRD boundary and Negative biological easement). For all practical purposes this lot is developed and is mitigated. Certified EIR. Both the steep slopes and gentle slopes are southeast facing and are therefore a major resource as they will accommodate the zero energy structures as proposed by the GPA proposal of 1985. The RPO fails to incorporate this or identify southeast facing slopes as a resource and must be included for posterity. There exists a non-building area easement which was requested by the City (for Pardee) in 1986. I granted the easements with the understanding that all NBA and slope easements be extinguished once the primary arterial road situation is established. There are several lots in the PRD that are affected (Lots 12 through 17 and 19 through 21). Since all Pardee phase shift proposals identify the prime arterial location north of the PRD there is now no need for these NBA easements except

331. Comment acknowledged. This position on the application of the MHPA to the subject property is noted.

332. These comments on the status of Lot 31 is acknowledged.

Response

possibly for a west ingress/ egress for the PRD. I will initiate extinguishment of these NBA easements in the near future.

333 I would like to mention that public trails through the Lee Living Trust parcel is not a good idea. First, it is to be a biological preserve (gnat catcher, etc.). Second, it is a major breeding ground of the Mojave Green Rattlesnake (very plentiful- several hundred kills over the years that I know of). Now I have been told that the U.S. Marine Corp. bred these snakes during WWII for the purpose of dropping them on the Japanese held pacific islands. There is no mention of this snake in your EIRS. They are highly poisonous. Please research the origin of these snakes. If they are indigenous to the Mojave Desert, what are they doing here? It appears that they should be destroyed for the purpose of public safety and for the birds, particularly for the gnat catcher.

334 On another note, there is a small agricultural pond at the center and is a watering hole for coyotes, bobcat, etc. A few years back I sighted a black panther in this area. I ventured in several times (armed) both day and night. There was a large colony of pack rats and several hopping rodents that looked like miniature kangaroos (kangaroo rats). The black panther looked very old and apparently was living off the rodents and cottontails. It shied away. Local folks told me that this cat was someone's pet that got away many years ago. Haven't seen him since. Your EIR did not mention the Road Runner. They are fairly plentiful and appear to breed in Lin property canyon. There have been many sightings in the PRD. I haven't seen any in the East McGonigle Canyon area. I was told by one of our nursery employees that in Mexico they are a delicacy and cross bred to chickens inferring to me that the residents of "Rancho Diablo", the migrant camp, consumed them. A week later he called me over and proudly showed me a caged Road Runner. I brought him a frozen chicken the

333. These comments on the status of Lot 31 is acknowledged.

334. According to the project biologist, the Mojave green rattlesnake referred to in this comment is likely to be the southern Pacific rattlesnake (subspecies of western rattlesnake) which is very similar in its appearance. The Mojave green rattlesnake is restricted to the deserts of California, Arizona, and Nevada, and the deserts and mountains of mainland Mexico. It is not found in the coastal areas of California. The southern Pacific rattlesnake is not considered a sensitive species.

Response

next day in trade for the bird and had him let it go. Later I told him to breed and eat rabbits (Conejo) instead. I gave them a hutch and a breeding pair in exchange for the promise of not to trap Road Runners.

Peregrine falcons (a couple of breeding pairs) have been sighted directly above the Nursery. I have seen them hunt this arroyo. Also, several other birds of prey including barn owls.

- 335 c. Lot 1, 20 acres is zoned A-1-10 and is a part of the PRD. Equestrian lots are planned for the future (reference CC & R's for Rancho Glens Estates. It has two sewers (8" and 10"). Two 8" water lines and two fire hydrants. In 1981, during the last El Nino, the McGonigle canyon dam (agricultural Reservoir) breached and at the same time a landslide occurred at Santa Monica Ridge on the east end of this parcel. Over the years, dirt from remnants of the 17-ft dam and the landslide were spread out and tilled into the soil during farming operations. Also, export dirt from Rancho Glens was placed and spread. Except for 6.5 acres, all of Lot 1 is above the 100 year flood line. Negative farming open space G delineates the 100-year flood plain. A 48-inch RCP (storm drain) exists north of Lot 1 at the street and empties out through Lot 1 to McGonigle Creek. The 18 inch sewer trunk traverses this parcel. The fire hydrants are at each end of the parcel and were installed for the purpose of combating future fires. The parcel is fenced and gated at three places. Trespassers have ripped out the gates several times. A creek crossing is maintained for police, fire trucks and city maintenance vehicles. This is not a permanent crossing and one needs to be constructed. The State of California Coastal Commission issued me authorization and permit to channel the remnants of the reservoir. This has not been done and will be needed in the future. The Rancho Del Sol certified EIR describes the hydrology and the flood plain, based upon the 1983 topographic survey that I had flown.

335. The referenced species were not observed during the biology surveys of the project site. The biology surveys of the project site were conducted by Natural Resource Consultants during 1996 and 1997. A biology technical report documenting the results of the surveys is an appendix to the MEIR. Table 4C-2 in the MEIR indicates that while the greater roadrunner was not observed during the survey, it is a species which could occur on the subject property. The reference to the peregrine falcon (a MSCP-covered species) is acknowledged, but this species was not observed during the biological surveys.

Response

336 Pardee's flood plain analysis (Latitude 33) is suspect. To the northeast they are preparing mass grading and modifying the natural drainage channels and as a result will be concentrating runoff towards Lot 1, Lot 2 and Lot 3. We are also concerned about concentrated runoff in Subarea IV and of course, Rancho Penasquitos. Now, the McGonigle Reservoir that was excavated in the 40's still exists. It must be returned to its natural state and channeled. Keep in mind that the 18-inch sewer trunk is next to this lake bed. Therefore remedial work must be done. Page 106 of the MEIR states that no flood control structures or features are proposed in the future for the creek systems in Subarea III. Has there been a combined hydrology/ runoff analysis of the combined effects of Pardee's property/ development plan NE of Rancho Del Sol, Subarea IV and Penasquitos? I believe that none of this has been done and that flood control features will be required to mitigate the runoff created by up stream development. Pardee's proposal is not acceptable.

I have provided comment- Written and oral. I have met with their planners and engineers and put them on notice. The drainage basins are in the Coastal zone. Permits will be required from the State of California to restore the land east of Rancho Del Sol to channel runoff.

337 Lot 1 (20 acres) is currently under cultivation for hay and grass. I will be bringing my thoroughbred horses (brood mares, foals and yearlings) to this specific location as planned. Lot 1 will stay A-I-10 for the immediate future, while we transition ourselves from Spokane to San Diego. This will take at least one year. Adjacent to Lot 1, above the toe of Santa Monica Ridge is a dedicated equestrian trail. This easement was granted to the city as a condition of the Subdivision map. There are no other trail easements granted. This 10-ft trail easement must be graded.

336. These comments regarding the history of Lot 1 of the PRD are noted.

337. The MEIR and Subarea Plan indicate the general location of detention basins which may be necessary to accommodate runoff from the project site. At the time future development proposals are brought forward, detailed drainage studies and appropriate hydrology/water quality measures would be required to the satisfaction of the City Engineer.

Response

I have no intention of contributing any of the land to the MHPA. In fact, a cursory review of the MSCP plan that I reviewed at the Carmel Valley shows this area and others as not in the MSCP and was in a developed state.

338 We will be demanding that McGonigle Valley/ Canyon be continuously farmed to the east and west as it has been since the Bear Flag Republic and possibly during Spanish Rule. This will be our insurance regarding fire control. Also dirt roads for fire trucks, etc. must be established and maintained. Under no circumstances should revegetation take place. There exists a slide next to and on the Pardee property. Again, this occurred in 1981 and appears on my 1983 topo.

338. Comment acknowledged.

339 d. Remainder Parcel 4, Ex. Map 12477, 113 acres. Pardee proposes to place this in the MHPA. This will remain A-1-10. This is not acceptable and I have no intention of ever contributing any of the land to the MHPA. This will remain A-1-10 with no public access. Except for the southeast slopes of Santa Monica Ridge all of it is in the Coastal zone. A certified EIR for this property was completed and approved in 1989 by the City and State. A substantial amount of Negative Biological and Farming open space easements were granted to the State and to the City in accord with the EIR and conditions of the Subdivision Map 12477. All landforms and biological sensitive areas are permanently protected and without any cost to the citizens of San Diego. I still have the burden of property taxes and the maintenance of these preserves. These preserves are consistent with the goal of the MHPA.

339. See response 330 above.

340 In a detailed review of your last DEIR for Route 56 I noticed that the MSCP boundaries left out parts of my property that is physically located on Del Mar Mesa and abutting Mr. Goodell's subdivision (which by the way we never received notice

340. See response 330 above

Response

from the city or Mr. Goodell. I am informed that Mr. Goodell's subdivision has been approved however. His subdivision land-locks that portion of the property abutting his.

Mr. Goodell and Mr. Coopersmith has promised to make the necessary corrections prior to his transferring the proposed subdivision to the new owner.

341 Pardee's proposal has failed again. Also, the MSCP map that I reviewed at the library shows developed areas in this 113-acre parcel. Nowhere do I see a yellow area to accommodate the Route 56 alignments that have been in existence prior to any MSCP or MHPA. This cannot be. Route 56 has been in existence before the annexation of the land into the City (1962). Annexation took place in 1964.

341. Comment acknowledged.

342 The SE facing slopes of Santa Monica Ridge and Cordero Ridge are a major resource as explained before and must be in the RPO, it is just too valuable of an asset for zero energy structures.

342. This comment on the history of the State Route 56 alignment and the relationship of the alignment with the establishment of the MSCP is acknowledged.

343 Another significant resource is the existence of mineral resources MRZ-2 on half of Santa Monica Ridge and Cordero Ridge. According to the MEIR (pages 315-316) significant mineral deposits of MRZ-2 are present and that there is an anticipated 60 million ton deficit of PCC aggregate through 2030.

343. Comment acknowledged.

These resources are extremely important to the zero energy structures as larger amounts of concrete are needed for the earth integration and the trombe-walls.

Now I have made a copy of your figure 4 I-2, mineral resource zones. Please note that the southerly alignment that I propose(d) for Route 56 is through this resource area.

Response

Do you fathom what this means? These will be enough aggregate to help pay for Route 56. Mining operations can go on prior to completion. Therefore the Route 56 alignment in Cordero Canyon/ Ridge is the most optimum and will further conserve of the shortage of this material. You must place this alignment as the most economical as well as resource oriented. I do not know how far the Cordero Ridge MRZ-2 deposits go east of SAIH. I believe, they will extend all the way. If so, than a tremendous cost savings will occur and the excavated material will alleviate the shortage predicted by 2030. In short, there will be enough base and enough concrete for Route 56! Am I missing something? Therefore, there can only be one alignment for Route 56 – This I have previously proposed in 1993, 1996 and again and again. I will be transmitting this information to all concerned and, the City had better be ready to respond and to provide a competent, nonpolitical comparative analysis. It is just too damn important. All this information is in front of your faces- Am I missing something?

344 As for farming I intend to keep on and go into grass, hay, horses, some corn, etc. There is a significant shortage of hay in California and most of it is being shipped in from Utah and Arizona. As for irrigation I intend to fire up the old well and put in a couple more. Also the permanent location of the growing grounds for Rancho Del Sol Nursery will be located on Santa Monica Ridge and other areas. Not all land is suitable- depends on the elevation.

345 The Deer Canyon reservoir is gone and is now a major source of siltation to Penasquitos Lagoon. In order to control this, around four acres of the 16- acre Biological Easement needs to be converted back to agriculture. I will be applying for this change with the Coastal Commission and I am reasonably certain that it will be granted. At its present state, it is a problem. There is an area left where water has

344. These comments on the Central Alignment for SR-56 and mineral resources within Subarea III are acknowledged.

345. Comment acknowledged.

Response

pooled and large wide mouth bass are still alive. Mr. Wallace, a resident of the PRD has taken it on to himself to move the fish to another lake.

We will be expecting that the farming areas east of Rancho Del Sol will remain to protect against Santa Ana wild fires.

Please refer to the figure showing all the possible SR-56 alignments through this parcel.

346 The MSCP/ MHPA has failed to provide for any of the middle proposed routes and as such is flawed the existence of Route 56 has been known since 1962. The city annexed in 1964. The FUA was created in 1974 with the 1962 alignment in place. In 1985 it was moved to the toe of Santa Monica Ridge. In 1993 I identified the Cordero Canyon alignment. In 1996, 97, and 98 I validated this alignment as the most viable and with the least environmental impact. Now, with MRZ-2 deposits this must be the route taken.

346. Comment acknowledged.

347 I present to you page 318 of the MEIR. This is quite interesting as it demonstrates the short sightedness of this document:

Issue: Yes it would because once in never out and the construction industry will be short, impacting the required sand, gravel and aggregate at great expense to the future residents of the area.

Impacts: There were existing mining operations in the overall area. There used to be a sand and gravel plant and ready mix plant. These are all gone as a result of the

347. See response 343 above.

Response

development of Carmel Valley. There has been no replacement. Pacific Highlands Ranch is but one area of the FUA.

Of the 116 acres of designated MRZ2 zone lands of which we are part, the deposits are identified as a source of aggregate which will be required locally. The cost of housing must be kept down! How in the world do you, the City, demand low cost housing and at the same time create a shortage of the basic materials for construction?!

Pardee's proposal of incorporating Rancho Del Sol 113 acre parcel is ludicrous and we will not allow it to happen. What has happened to common sense? Even the most prudent environmentalist would laugh at this proposal. Can you fathom the amount of pollution from the trucking in of materials, the wear and tear of our overburdened freeways and roadways, etc. and etc.

Precluding the reasonable extraction would be a travesty.

348 Consider Route 56 and its needs: The base required, the concrete required, and the excavation and grading required. The statement of significant impacts is played down. There is a history of mining activities in the FUA which have been shut down. There will be no intent on the part of Rancho Del Sol to keep this resource in perpetuity. How can the writer of this paragraph conclude that since they would be retained in perpetuity as open space areas that there would be no potential significant direct impacts (or anticipated). The person who wrote this should be summarily fired. I request an investigation of this area and further request that Mr. Frank Belock, the City Engineer be deposed as to why the Barczewski Southerly Alignment is "fatally flawed". We are talking about millions of dollars in savings to the tax payers and

348. The draft EIR concludes that the inability to mine mineral resources under the proposed projects is a significant cumulative impact. Only adoption of the No Project alternative would eliminate this potential adverse effect.

Response

future residents. I further request an economic analysis of the situation. Certainly something is not adding up and, we the property owners in the area are being kept in the dark. What is the hidden agenda?

The value to Route 56 is enormous and Cordero Canyon is pointing the way.

349 I just hope that I have not incensed anyone in the City as most of you know that I have allot of respect for it's staff. I intend to obtain a permit to initiate the partial mining of this resource without impacting the land. You all know that I have been very prudent and a good steward of the land. There is just too much at stake to allow any further restrictions. Let common sense prevail. Route 56 must go through to keep you the City, out of State and Federal courts. All resources and efforts must be concentrated in accomplishing Route 56. Without it, Penasquitos and Carmel Valley is shut down. Also, there is a growing hostility towards the City. There are talks of "de-annexing" or "detachment" due to apparent mismanagement or failure to communicate. Before closing comments on this 113 acre parcel there are more items that are required. You must show access from the west across Pardee property to Rancho Del Sol. This must be a 60 ft. ROW so that we are not impaired in any way.

349. See responses 343 and 247 above.

350 Regarding the sensitive plant species: As you know we are a commercial nursery with major facilities and talented personnel. We can in fact grow any of the sensitive plant species. Will the City of San Diego purchase them in quantities of thousands of flats? I have always been intrigued about these indigenous plants. But, is there a market? As for the remainder of this parcel, the fire of 1989 was so intense that the south side of Cordero Ridge was totally incinerated. 150+ year old barrel cactus stands were totally done in. My investigation and reconnaissance of this area established that there

350. These comments on SR-56 are acknowledged.

Response

had been no fires in the past 200 years. There is not much left and therefore, Cordero Canyon is quite available for Route 56.

351 Concentrated runoff from upstream development appears to have collapsed the Deer Canyon reservoir. It is now a major source of siltation. Remedial work needs to be performed and the City needs to concentrate on flood control and perform more hydrology studies.

352 This 113-acre parcel is part of the Rancho Del Sol Subdivision Tract Map 12477, Recorded 10/89. It has two 8-inch water lines to it and access to the McGonigle trunk sewer via two existing 8 and 10- inch sewers. It is landlocked and requires public street access to the west although it has prescriptive rights as a result of farming operation and existing dirt roads above and below Santa Monica Ridge. Part of the property is topographically part of Del Mar Mesa and abuts David Goodell's development.

353 Mr. Goodell/ Latitude 33 and the City failed to give us notice and the benefit of the various hearings, and review of their EIR, hydrology, grading, streets, etc. Portions of this property is not even in the MSCP. I notice that the source of maps and info is Latitude 33 planning and engineering. A detailed inspection of Figure 3-4, Regional open space plan (MSCP) shows the boundary of Subarea III not including several acres of this parcel at the south.

As a result, we demand a hold on Mr. Goodell's final map until we assess the impacts to our land. I already know that his subdivision will be dumping runoff water on our property, and that they have not provided us access to the public roads. I also need to know the location of public utilities and the like. They are also planning to grade our

351. Any revegetation done to establish mitigation credits within the MHPA would be accomplished pursuant to the Conceptual Revegetation Plan prepared for the draft MEIR and per a Master Revegetation Plan as part of the Subarea Plan.

352. See response 336 above.

353. This comment on the relationship of the subject property to another subdivision within Subarea V is acknowledged.

Response

property. We understand that the approved subdivision is in the process of being sold. We need to give notice to them of our intent to provide another SR 56 alignment below Del Mar Mesa. As for the adopted framework plan we again did not receive notice nor had the opportunity to address the City Council. We did hear after the fact that the Mayor and some members of the City Council considered it unfair to the small property owners and favored Pardee, but adopted it for the lack of anything else.

354 The MSCP and MHPA plan was not provided to us for review. We have not had the opportunity to review and comment. We again did not receive notice of the plans. I have heard that there is a procedure where in adjustments to the plans can be made. Please provide us with the City of San Diego notice package: Three sets to:

Sandra L. Barczewski, Trustee
8222 South Ramona Rd.
Spokane, WA. 99224

Robert D. Barczewski, Trustee
6561 Black Mountain Rd.
San Diego, Ca. 92130

Zero Energy Systems,
Same as above

As presented I consider the MSCP as a "land take". It is in my opinion this is a violation of the U.S. and State Constitution and may be in conflict with existing City Charter, ordinances and codes. It also appears to be an intent to take away agriculture and future development rights. It is in conflict with the General Plan, the FUA language and City Council Policy 600-29.

354. Figure 3-4 is intended to generally illustrate regional open space.

Response

What ever the case, we have established many acres in farming and biological preserves in accordance with 600-29. A certified EIR is on file. The remainder of the property must be considered for urban development as planned and established by the subdivision map 12477.

Route fifty-six

355 The figure shows the various Route 56 alignments through Rancho Del Sol. All possible alignments go through the property. As an affected property owner with substantial knowledge of the land the most environmental sensitive is the 1993 alignment that I had proposed to Caltrans. Please refer to my letter to the Planning Commission.

In 1985 the city staff and I agreed to eliminate the 1962 alignment in order to save McGonigle Canyon/ Valley and Santa Monica Ridge. We then placed it next to Deer Canyon at the toe of Santa Monica Ridge. In 1996 the City (Belock Alignment) moved it up Santa Monica Ridge. This is currently referred to as the Central Alignment. It wipes out much of Santa Monica Ridge, particularly the SE facing slopes which is a Major Resource as previously explained.

The 1998 alignment alternative resulted from the demise of the Deer Canyon Reservoir and provides for a more superior alignment without affecting the Santa Monica Ridge slope. However it does present a future problem with regard to future development.

355. The MSCP was adopted by the City Council in March 1997 and copies of the MSCP and descriptions of the boundary adjustment process are available at the City of San Diego. The public comment period for the Environmental Impact Report/Environmental Impact Statement (EIR/EIS) ended on October 15, 1996, and therefore there are no public noticing packages available. However, the EIR/EIS (LDR No. 93-0287) is available for review at the offices of the Land Development Review Division at the address noted above.

Response

The 1993 alignment is the most superior of all, having natural topographic barriers and substantially less environmental impacts. It does not affect any vernal pools and will be scenic. More important, it can accommodate expansion to 8-lanes or more as desired by Caltrans and the City Engineer. The recent findings (MEIR info.) of the existence of significant high quality aggregate (MRZ-2) deposits (and extending to the east) makes this alignment completely and clearly superior. It will save the taxpayers of San Diego millions of dollars and will actually help the environment, promote farming and preserve farmland. The material excavated will be used by the highway and what export is left will be utilized locally.

Page 316 of the MEIR states: Based on a total projected Portland Cement concrete (PCC) demand of 360 million tons of aggregate and assuming that all PCC quality material will be used, there is an anticipated 60 million ton deficit of PCC aggregate through 2030.

It therefore appears that to alleviate this shortage, SR 56 must go through Cordero Canyon, I do not have a handle on the quantities that are involved, but based on the info given and assuming that there is a deposit 8,000 ft long, 30 feet deep along the ROW compute out to be:

$350 \text{ feet width} \times 30' \text{ depth} \times 8,000 \text{ feet} = \sim 2,896,500 \text{ cubic yards or } 5,793,100 \text{ tons}$

This would help the shortfall by 10% and would provide future access to the deposits for the development of the various subareas. In addition, aggregate, sand, gravel and concrete processing plants can be located within a very short distance to the various developments and result in very short trucking distance which would in turn lower costs, lower emissions and therefore lessening to a small degree global warming.

Response

There will also be less need to create sand pits in areas that are classified as wetlands. Obviously, I do not know of all the facts and ramifications. However, I do know that tremendous savings will occur and that we will be keeping our own dirt etc. in "our own backyard".

Perhaps this is an answer to Mr. Frank Belock's problems. As I recall he has the problem of providing over 8 lanes of freeway. Now it appears that this is more than feasible. I am sure that all sorts of negatives will be thrown up. However, I believe the positives will greatly outweigh the negatives.

Who ever got this MRZ-2 info in the MEIR must be complemented because of the importance to the Route 56 Dilemma. No one is happy with the other alignments. Now everyone should be happy with this one. Just think of the millions of dollars that it would save. As for mitigation, I believe that this approach is self-mitigating, except of course for the required plantings, dust control, etc.

356 Moreover, there will now be the possibility of more permanent reservoirs. Then there is the total preservation of Deer Canyon and it's water shed.

As far as the MHPA / MSCP is concerned – They are only a plan that is on shady economic and legal ground. They are not law. They are after the fact. Route 56 alignment has existed since at least 1962. Annexation into the City took place in 1964. The General Plan and all the other adopted plans call for Route 56 to be in this southerly corridor. The MHPA and the MSCP must take a back seat or be placed on the endangered list or in the trash can. It is reaching too far.

356. These comments on SR-56 are acknowledged.

Response

The MHPA also endangers wildlife, private property, farmland, and farming rights. It is setting up the enormous probability of huge wild fires that endanger the lives of people and property. As I said before, I have seen two large ones in the last twenty years. Do you know that fire trucks are helpless and that the only effective means are bulldozers? Where will the dozers be when we need them? It was the farmers who supplied them when needed and where close by – farming.

I think that preserving the areas as I did is necessary but not on a wholesale basis and not at the expense of the property owners and the taxpayers. An artificial shortage of developable land had been created. Who can afford to live in the area? You promote low-cost housing and require it. There is no such thing in North County. Lastly, it is un-American. As one person said to me: "Bob, I am a liberal democrat from Minnesota. I have never seen anything like this (MHPA/ MSCP)".

Needless to say, I will not participate in this ill fated phase shift application. I see no chance for its approval. I will not allow any further land takes. We have already given up at no expense to the taxpayers 50% of the land plus provided public roads, etc. We have a certified EIR. The next take will be Route 56 but we agree with the requirement for it and will be compensated.

As Concerns the MEIR's proposed take of prime and semi-prime agricultural land and its incorporation into the MHPA:

3571. The write up (pages 307-313) is definitely biased towards land take. It starts of by saying that "agricultural Production has a lengthy history but is not regionally significant. I attach here with my notes and markup of this section. It then goes on and states that agricultural pursuits in the area overall are diminishing and only discusses this in terms of vegetables. Next it identifies that only 136 acres are prime farmland and which are

357. The MSCP is approved and adopted by the City of San Diego and is used within the City in its permit decision-making process. It is anticipated that the California Coastal Commission will review the MSCP and consider its adoption sometime in 1998.

Response

located in McGonigle and Deer Canyon (figure 4-I-1). It then finally admits that 14% of the Subarea have high soil ratings. It also eludes to the fact that 48% of the area is economically farmable and that most of it is being farmed. Finally it states that 52% of the soils are mainly restricted to pasture, range or recreational uses. Then it goes on to state (as required by law): "Conversion of prime agricultural land to non-agricultural land use, or impairment of the agricultural productivity of prime agricultural land is cited in the CEQA as an environmental consequence which may (or will) be deemed to be significant: (State Administrative Code, Section 15064). Also defined in the California Government Code, Section 51201, Williamson Act, LAFCO guidelines, etc., etc.

3582. This section of the MEIR fails to identify and include the horse industry in the overall area including Rancho Santa Fe, etc. Horse breeding and raising is agricultural and is huge. Did you know that we have the largest population of horses in the United States? We are breeders of thoroughbred horses. We also raise them. We also have a stable of horses of racing age. We are members of the California Thoroughbred Breeders Association and are licensed to race in the State of California, Washington and Arizona. I will be contacting the State and the various associations to inform them of what you are up to. Your plan to convert prime farmland and pasture land into habitat will not succeed. It is ludicrous and a waste of the taxpayer's money.

3593. I want to bring your attention to page 308 (my markup) entitled, "Important Farm Lands". I have drawn in the boundaries of Rancho Del Sol. All of McGonigle Valley, Deer Canyon and portions of Cordero Canyon is prime farmland. Lot 1, 20-acres, over half is prime. The same for Lot 31. The 113-acre Parcel: except for the steep slopes of Santa Monica Ridge and Cordero Ridge, all of it is prime. In addition, these Ridges contain another prime natural resource – MRZ-2. Therefore, this entire parcel is prime

358. The draft EIR concludes that the loss of important farmlands under the proposed project is a significant direct and cumulative impact. Only adoption of the No Project alternative would eliminate this potential adverse effect.

359. It is acknowledged that pasture land for horses is considered agricultural. Its loss is included in the draft EIR conclusion mentioned in response 357.

Response

and cannot be incorporated into the MHPA (except for the biological preserves under protective easements).

In answer to the question posed in part 4, section 1 of the MEIR "Would implementation of the Pacific Highlands Ranch Plan result in the conversion of agricultural land to nonagricultural uses or impairment of existing agricultural land to non agricultural productivity?" I answer: Yes, The MHPA would convert it to habitat and create enormous fire hazards. And then the next question, "Would implementation of the project result in the prevention of future extraction of sand and gravel and/or mineral resources?" Again, Yes, it will make it impossible.

The selection of the 1993 Central Alignment for Route 56 will be conducive to the preservation of prime farmland and other natural resources. Designed properly, it would also provide the necessary access and other infrastructure to help promote its use. In addition, it would serve as a dividing line between the true preserve area (Del Mar Mesa and Penasquitos Canyon) and the agricultural oriented area surrounding the planned urbanizing areas. Biological and wildlife areas would still be interconnected but to the extent where prime or near prime farmland is implemented.

I have been actively engaged in agricultural pursuits over the years and have become very experienced in mitigating farmed areas and wildlife/ biological areas in the same ownership. Most of the time they go hand in hand. One does not have to foreclose the other out as I have experienced with Poplar Gate Farm here in Spokane, WA. We have 25 acres of grass/ alfalfa bordered by areas of pine forest. The house, paddocks, pens, barns, turnouts, arenas, orchards, residences are on the other 25 acres and which are bordered and interspersed with large pines and natural wild life and biological habitat. We provide water, salt licks and other grass areas (in the rockier part). The end result as

Response

my pictures and videos will validate is a farm/ranch that is teeming with wildlife and birds.

For example, living on site is about four white tailed deer, occasional large coyotes, porcupine, an occasional moose, elk in certain seasons and red deer. The birds are varied and profuse as well as seasonal. Year around we have 200 covey of different varieties of quail and game, pheasant, red-headed wood peckers (next to the house as well), two breeding pair of hawks (redtail and other), magpies, etc. Birds of prey are currently nesting (about four nests).

The alfalfa field is open and fresh running water is provided year around. Large mammals come and go as they please because we do not allow total fencing of the perimeter. The adjacent owners have portions of their fields in wheat and oats. In the fall and winter hundreds of geese and duck arrive. Swallows even migrate here in the thousands. No hunting or shooting is allowed. The birds and quail integrate with the horses in the pastures and paddocks. There are also 4 barn cats and two dogs. The cats keep the rodent population under control and out of the barns and feed rooms.

e. The northern parcels that are clear of the MHPA proposal are:

- 360 1. Sandra L. Barczewski, Trustee. 2 Parcels divided by dedicated 60' wide Santa Fe Farms Road totaling 28 acres net. Under intensive agricultural use continuously since the 1800's. Contains one residence and substantial nursery infrastructure and buildings. Wholesale and retail nurseries. Production of color plants, groundcover, palms, ornamental trees and shrub, the Rancho Del Sol Nursery is the only wholesale nursery left in the area. Evergreen, a retail nursery, will be moving to Oceanside.

360. See response 357. The portion of the comment's preference for the Central Alignment for SR-56 is acknowledged.

Response

2. Robert D. Barczewski, 1 Parcel, 6.6 acres

In 1990 as part of the Rancho Del Sol Subdivision conditions, urban infrastructure including 10" and 8" sewer, double 8" waterlines, public street expandable to 92 feet (4 lane) with concrete curb and gutter and storm drains were constructed. 8" and 4" water main laterals, several water meters (2" and 1") are available to each of these parcels. Also fire hydrants and street lights. Extensive and beautiful landscaping was installed. Mature trees and shrubs line the streets.

The highest and best use has been identified in the past and present as neighborhood commercial and mixed use. The property is not to be sold and is for the generation of income for the benefit of Sandra Barczewski in her lifetime and the two primary beneficiaries R. Christopher and Marci Ann Barczewski and posterity. The land can be developed for income but not sold unless circumstances require.

These properties are covered and governed by certified EIR and the Rancho Del Sol Subdivision Tract Map development conditions as executed in 10/89.

361. See response 330 above.

361 The phase shift/ GPA application of April 1985 still stands. The proposal is for the development of an alternative transit oriented village similar in architecture to Rancho Santa Fe but employing alternative architecture, grading and landscaping. Heat and water recycling and incorporation of alternative energy conservation techniques, apparatus, etc., etc. A substantial effort and resources were expended, not including the R&D effort that was accomplished in Palos Verdes.

Sandra Barczewski's parents are Edwina McDowell (deceased) and Paul McDowell. Both long-term residents of San Diego. Edwina was employed by the City of San

Response

Diego for a long period, she was the secretary for Mr. Ed Gabrielson, City Engineer and after his retirement became the first women building inspector for the City of San Diego. Paul, was the chief operating officer/ V.P. for Trepte Construction Company. Both retired and moved to North City West, purchases one of the first few houses from Pardee. Marci Ann also lives in a condo purchased from Pardee. Since their retirement, the McDowells and Gabrielsons have remained social friends.

Out of respect for the City, her parents and the Gabrielsons, Sandra Barczewski will not stand in the way of the City's crucial need for a Route 56. Therefore, although she does not like Route 56 crossing her property and destroying and impacting what we have established there, she has established a corridor on her land for this crossing. This detailed info was sent to you and I will not repeat it. She is opposed to anything further north on her property and will in fact file suit to protect her interests. All Alignment D, Modified D and Modified F, as far as she is concerned, are one and the same. The analysis we did on these crossings specifies the exact crossing/ alignment and that would be at least cost and damage. There will be mitigation for Rancho Glens Estates and this will be taking Lot 27 and 26 out of the PRD and adjusting and reconstructing the entranceway. The land could revert back to the subdivision and the original owners in turn for credit towards the land take that is necessary for the freeway. Other mitigation would be to shift the alignment 1,000 feet west before coming into Rancho Del Sol. This, however, is assuming that a southerly/ central alignment is not politically feasible for the City at the present. Also, this assumes a four-lane plus expressway and that all future lanes would be accomplished in the south a decade or so from now. As for the other prime arterial (Carmel Valley or Del Mar Heights), we are assuming that the City Engineers (1982) successor, Mr. Frank Belock will stipulate to the realignment of existing Black Mountain Road and the removal of the "S" curve and be aligned along the parcel property lines which are

Response

coincident with the centerline of the forty foot Del Mar Pipeline Easement, or be placed at the northern boundary and terminating at Rancho Santa Fe Farms Road. This would allow for the future 4 – 6 lane prime arterial at either location. For some reason, Pardee will not listen or incorporate this requirement. This is specified in my subdivision map conditions. Furthermore as a condition of this “safe corridor” alignment and the identification of Carmel Valley prime arterial to be located north, we expect the immediate vacation of the temporary non-building area easements and slope easements that were imposed on the subdivision. This pertains to Lot 31, 13-18 and 19-22 of the PRD.

362 Pardee’s proposal calls for peripheral Residential on the two larger parcels and, low density on the north parcel. This is not acceptable as previously explained. We are planning a village mixed use commercial on the entire property. We have provided detailed comments and documents to Latitude 33. None have been incorporated. They cited the City as the culprit. Please refer to Cathy Winterrowds letter to Latitude 33. She is providing direction to them: “Barczewski: show framework plan land uses and corresponding zoning, do not include a second commercial core on this property, include the existing development area, show the MHPA consistent with the adopted MSCP Subarea plan.” Finally she says “provide all property owners with a copy of the proposed Subarea plan for their review and comment.”

1. Since she is the project manager in the City for this Subarea, is she not responsible to insure the earliest communication of information to all affected landowners? She has not done this. All the people around were kept in the dark. The only reason I found out about this was a very late City notice. She, Pardee and Latitude 33 has purposely withheld information. She shall be held accountable for this

362. The status and history of the referenced General Plan Amendment application of April 1985 is acknowledged.

Response

action. We did not receive any prior notices on the other matters over the last few years.

In the MEIR, there is mention of a Pardee settlement agreement with the City. It is not provided. We all demand a copy of this agreement since it does effect all the other properties, public safety, health and welfare, etc.; As well as the proposed taking of land.

2. "Framework plan uses and corresponding zoning" are something very new to us. We have not been noticed and have been deceived by the City of San Diego. Where are the density transfers, etc., etc.?
3. Do not include a second commercial core on this property. We are not asking for a commercial core. We are demanding, based upon long term planning and prior applications a village orientation to serve the greater San Dieguito planning area. We are part of it and the City does not even recognize this. We identify with the greater Rancho Santa Fe area and will continue to do so. There has always been a need for a village center for the past 20 years. There is a shortage. Therefore, we do not understand her and Pardee's problem. Again, we are the first on the block-executed subdivision, urban infrastructure, commercial infrastructure, and so on. Perhaps Cathy is too used to extreme high density and cookie-cutter homes. We must preserve what is left of our living environment and this is certainly not what is proposed by Pardee. Frankly, although Pardee serves a good purpose, they and the City have failed to recognize our past planning and development efforts. Pardee wants mass grading and manufactured slopes. We don't. Pardee wants heavy concentrations of housing and a get in and out type of construction. We

Response

don't. Pardee wants to destroy natural drainage courses. We don't. Pardee wants to place highways in the North, we don't. I can go on and on.

It's been said and I am beginning to believe that Pardee has controlled the City's Planning Department for the past twenty years. I can say that I now believe this. They just go ahead and do what they want to accomplish the various developments that they are planning in all areas- in and out of the FUA. General Bull Moose has gone too far. It is now time for the city to take time to fathom the huge problems that are festering to the East (Penasquitos) and to the West (Carmel Valley). It appears to me that the city must place a 2 year moratorium on all residential construction in these two areas. We are being punished for the sins created in these two areas. Caltrans is mentioning a 2 year delay of any construction of Route 56 Central segment because if built it will cause 15 – 30 minute pile ups at Carmel Valley I-5.

With the above in focus, does it not seem more sensible to create areas of commerce, etc. To offer businessmen (and women) an alternative to La Jolla Village, Downtown and even Carmel Valley. My God, we are having some problems just getting over to the Del Mar Race-Track and Red Tractons Restaurant.

4. "Include the existing development area". Well this is not acceptable. This is against the concepts of the General Plan, etc., which I will expand on later.
5. "Show the MHPA consistent with the adopted MSCP Subarea Plan." This has not been done. In fact, the MHPA plan by Pardee is a forgery. They have concocted 100 year flood plains boundaries based upon their runoff (mass grading on the northeast), proposing to inundate Lot 1, 2 and 3 and other areas and then,

Response

establishing an MHPA boundary based upon this. What do you think of this? Is this a forgery? These are heavy accusations, but I have the proof. Will Cathy Winterrowd be able to withstand a searing deposition. Well, she had better be prepared for one. Her failure to communicate with us is not acceptable. Who does she work for? The City or Pardee? We will not mince any words when it involves anything to do with her proposed MHPA. A simple comparison with the original proposed MHPA (which we were not notified of a few years back) and the current one will show glaring differences. She is just allowing Pardee to do what it wants.

Therefore, I see no alternative but to recommend to the City that she be removed as a project manager for Subarea III. There have just been too many infractions, the main one being not being available to other affected landowners, smaller or larger, NIC Pardee.

- 363 On other issues, we are opposed to their circulation plans through Rancho Del Sol. NOT ACCEPTABLE. We have provided input to Pardee and Latitude 33, but to no avail.

There is also the elementary school location next to our heavy farming, horticulture and horse operations. This is not acceptable to us or to the Home Owner's Assoc. (PRD). Pardee has all sorts of more viable locations to the east next to their proposed open space. Also this is not a good idea regarding the PRD and the future intent of my providing a small retirement area.

There are proposed public trails. As mentioned before, this is not possible for reasons said. There is, however, a dedicated 10 foot equestrian trail above the toe

363. These comments regarding the landowner's position on the proposed land use designations for the ownership are acknowledged.

Response

of Santa Monica Ridge. Give me some money and I will put it in. I also have other better ideas for the bike paths, hiking trails, etc.

Pardee proposes to wipe out our street (1990 installation) and infrastructure. Since we only see Modified F as the only possibility for the Northern Alignment, I will not pay any attention to the other alignment proposals. We hereby demand that our street remains intact. We will not succumb to Pardee's mass grading proposal and infrastructure as they see it. They must maintain natural drainage courses and grade accordingly. We do not accept any of their proposed circulation. We will dictate to them as what is and what isn't acceptable. I have already provided substantial input.

Finally, I want to relate to you that for years we and other have considered the northern corner parcel known as "Bob's Corner" locally as for commercial use only. There are many, many memories with regards to the balloonists and "Nice Guys" events, etc., etc.

There are many flaws in the presented and colorful aerial photographs depicting the boundaries. The Coastal zone is 550 feet off – too far north. Property boundaries are also about that much off. In short there is not anything in the MEIR that does not revision. It is a losery, error-ridden proposal and will require substantial overhaul and newer and more objective sources of information.

Since it is now 3:00 p.m., Sunday and the deadline is tomorrow, I will close.

Response

- 364 1. Please do not include any of the property that we own that is proposed to be taken over by the MHPA in this proposed phase shift. These are Lots 1, Parcel 3 to the east and 113 acres of remaining parcel 4.
- 365 2. Rancho Del Sol exists as a legal subdivision. It is not even mentioned anywhere in the document.
- 366 3. Provide a reservation of 10% of all of Pardee's residential density ad 10% of the proposed commercial for Rancho Del Sol.
- 367 4. We are totally opposed to the MHPA proposal. It does not even come anywhere close to the original MSCP plan Proposal. The legal grounds for the MSCP is also quite shaky.
- 368 5. Route 56 should probably be delayed so that we don't rush into a bad situation. Several events and discoveries have occurred as previously explained. It sure looks like the Southerly Modified Central Alignment as I proposed based upon information provided by the MEIR is the way to go. Two years seems to be the appropriate delay. A moratorium on Penasquitos and Carmel Valley should also be imposed. It appears that staff in the City must be reorganized. Probably new faces, mindsets, etc. This will be required for you to respond to some very upset residents and landowners in the area. The whole Subarea III will have to be redesigned from the very beginning for it to become a reality. So far it spells G-R-E-E-D.

I apologize for not having the time to edit my own writings. Therefore consider it as a rough draft. Again, I am trying to keep things in proper perspective. It is hard to do when your own neighbors are upset and have litigation against the phase shift proposal and Route 56 specific alignments.

I just hope that I have conveyed sufficiently the information on what the areas of trouble are.

364. All noticing for the proposed project has been done in accordance with local and State requirements. The references to the "Pardee Settlement Agreement" on pages 83, 105, and 186 of the draft MEIR are taken from the City of San Diego's MSCP Subarea Plan (Item C19). This document is available for review at the offices of the Land Development Review Division at the address noted above. For information on the settlement agreement, please contact MSCP staff at the Community and Economic Development Department, 202 C Street, Fourth floor, San Diego, California 92101.
365. The North City Future Urbanizing Area Framework Plan is a document for guiding the City in its achievement of community goals and objectives. The Framework Plan identifies broad goals and policy statements to be used in evaluating future planning efforts in the Future Urbanizing Area. The specific subarea plans are land use plans that, by their nature, amend the Framework Plan for the subject subareas.
366. Comments acknowledged.
367. Comment acknowledged.
368. The City of San Diego's MSCP Subarea Plan contains provisions for Boundary Adjustments. The Boundary Adjustment that has been proposed for this project is the result of discussions among the City of San Diego, the United States Fish and Wildlife Service, the State Fish and Game Department, conservation groups, and the applicant, and does not reflect any independent actions on the part of the City's Subarea Plan Project Manager.

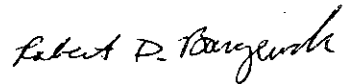
Response

I have seven yearling thoroughbred horses that I will be naming soon. Since I have been so engrossed in the matters concerning us I have decided to submit names to the Jockey Club as follows. Keep in mind that I own a stallion named "Dave's Reality" by his famous sire "In Reality."

1. Route Fifty six
2. Fifty six Realities
3. Phase Shift
4. Phase Shift Reality

There are two colts and five fillies all by Dave's Reality. They will be running mid July of 1999. It will be interesting to see who runs first, the horses or the developments. Hopefully we will all be relocated to San Diego by that time.

Respectfully Yours,



Robert D. Barczewski

Cc: Mayor Golding
Louis E. Goebel, Esq.
Ann Pancoast, HOA
Frank Belock, City Engineer
Mrs. Beatrice Beck
Mr. & Mrs. Zurcher

Response



LETTIERI-McINTYRE AND ASSOCIATES, INC.

May 26, 1998

Ms. Eileen Lower
City of San Diego
Development Services
LAND DEVELOPMENT REVIEW DIVISION
1222 First Avenue, MS 501
San Diego, CA 92101

SUBJECT: PACIFIC HIGHLANDS RANCH (SUBAREA III) SUBAREA PLAN EIR

Dear Ms. Lower:

369 As a supplement to Jeff Lin's letter dated May 18, 1998 commenting on the Pacific Highlands Ranch Subarea Plan EIR, I would like to request that Figures 3-7 and 3-10 in the Final EIR be revised to be consistent with the revisions to be made to Exhibits C-1 and C-2 in the Subarea Plan. We have been working closely with Cathy Winterrowd in Community Planning for several months on the location and design of the north/south "Neighborhood Parkway". Although the design and location are correctly shown in Figures 3-1 and 3-2 of the EIR (and Exhibits 2-1 and 2-2 of the April 3, 1998 Draft Subarea Plan), the revisions to Exhibits C-1 and C-2 in the Subarea III Plan have not been completed to reflect the MSCP encroachment for the final location of the Neighborhood Parkway. Cathy Winterrowd indicated that the MSCP preserve encroachment for the Neighborhood Parkway is going to be designated as a "City" modification in the Final Subarea Plan.

Although the public review period is officially over, I wanted to follow up with a separate letter on this issue to ensure that the appropriate revisions get made to Figures 3-7 and 3-10 of the Final EIR, as well as in the Exhibits C-1 and C-2 of the Final Subarea Plan. Thank you for your assistance in this matter.

Sincerely,

LETTIERI-McINTYRE AND ASSOCIATES, INC.

Deborah L. Collins, AICP
Senior Project Manager

cc: Cathy Winterrowd, Community Planning
Jeff Lin

\\PLANNING\PROJECTS\SUBAREA\DOCS

1551 Fourth Avenue, Suite 430, San Diego, California 92101-3152 / (619) 238-4241 / FAX (619) 238-9772

369. Figures 3-7 and 3-10 of the draft MEIR will be revised in the final EIR to be consistent with Exhibits C-1 and C-2 of the Final Pacific Highlands Ranch Subarea Plan.

PR-180

Executive Summary

A. Introduction and Project Background

The North City Future Urbanizing area (NCFUA) Framework Plan was adopted and the final EIR for the Framework Plan (DEP No. 91-0809) was certified by the San Diego City Council in August 1992. The Framework Plan is a land use policy document that provides general guidelines for development of the 12,000-acre NCFUA, within which Subarea III is located. The City's Progress Guide and General Plan was amended to incorporate the Framework Plan at the time of its adoption. However, pursuant to the 1985 Managed Growth Initiative (Proposition A), portions of the Framework Plan are not effective until a majority of the voters of the city approve a shift from the Future Urbanizing phase to the Planned Urbanizing phase.

The Framework Plan divides the NCFUA into five subareas, requiring the preparation and approval of detailed subarea plans before development can occur. The purpose of the proposed Subarea III Plan, now referred to as Pacific Highlands Ranch, is to establish a land use plan and an open space system which comply with the requirements of the Framework Plan for the NCFUA and other relevant City plans and policies, including the adopted Multiple Species Conservation Program (MSCP).

To date, subarea plans have been approved for Subareas IV and V, and one is currently being prepared for Subarea I. Based on the Managed Growth Initiative of 1985, all proposed subarea plans and associated phase shifts to the "planned urbanizing area" will require a majority vote of the people.

A draft subarea plan for Pacific Highlands Ranch was proposed in 1993 which included 6,500 dwelling units, 400,000 square feet of commercial and office use, and associated public facilities and transportation network. Because of the uncertainties regarding State Route 56 (SR-56) and the failure of a July 1993 ballot measure which would have resulted in a phase shift of the entire NCFUA, the above Pacific Highlands Ranch planning efforts were put on hold.

Subsequent to this initial planning effort, four individual projects within the original Pacific Highlands Ranch have been approved. These projects include the Del Mar Highlands Estates Planned Residential Development (PRD), Pet Facility Conditional Use Permit (CUP), Bame Parcel subdivision, and Seabreeze Farms. A PRD/vesting tentative map (VTM) was approved for Del Mar Highlands Estates in April 1997 consistent with the underlying zoning. Because a phase shift was not required for Del Mar Highlands Estates, this 389-acre property remains in Pacific Highlands Ranch. The Pet Facility

CUP was approved in 1996 at the southwestern corner of the subarea in Carmel Valley, and the subdivision of the Bame Parcel (four units) consistent with underlying zoning was approved in 1995. The 72-acre Seabreeze Farms project was approved by the City Council in July 1996, and a phase shift to Planned Urbanizing was approved by the voters in November 1996. The Seabreeze Farms project area on the western boundary has been excluded from the current Pacific Highlands Ranch boundaries.

With the removal of Seabreeze Farms from the boundaries of Pacific Highlands Ranch, the proposed Pacific Highlands Ranch project area now consists of approximately 2,652 acres within the overlying NCFUA. The majority of the subarea consists of undeveloped land, with agricultural uses occurring over much of the site. The proposed subarea plan would refine the existing NCFUA Framework Plan by proposing specific locations for roads and siting and land use designations for future commercial, residential, and public facility land uses. The adoption of a subarea plan is a prerequisite for voter consideration of a General Plan phase shift from Future Urbanizing to Planned Urbanizing, and no approvals for specific development under the subarea plan are being considered at this time.

B. Project Characteristics

1) Land Use Summary

This Master Environmental Impact Report (MEIR) addresses two separate land use plans which incorporate two proposed northern alignments for the middle segment of SR-56. These two northern alignments are currently being evaluated by the City in a revised draft EIR released on January 21, 1998. The alignments are based on public input received during the public review of the January 1997 draft City EIR which evaluated two other alignments: a northern and central one for the middle portion of SR-56. All of the alignments would pass through Pacific Highlands Ranch.

Both land use plans illustrate the alignments for major streets and SR-56; pedestrian, bicycle, and equestrian trails; a Town Center and Village area; an employment center; sites for schools, parks, and other public facilities; transit facilities; delineation of MSCP open space, wildlife corridors, permanent open space areas, and urban amenity areas; and design principles ~~and standards~~ for future development. A Resource Protection Ordinance (RPO) analysis and Council Policy 600-40 development suitability analysis has also been prepared for both subarea plans. Both plans are summarized below.

a) Subarea Plan 1 (SR-56 Alignment "F")

As proposed, Subarea Plan 1 includes up to 4,974 new residential dwelling units; a ~~Town Center and Village~~ area consisting of commercial uses, retail uses, ~~community green~~;

high-density residential, and a civic use area; an employment center; three elementary schools; two neighborhood parks; a community park; one junior high and an optional junior high school; two high schools (one private and one public); a public library; a double fire station; and the associated public facilities and transportation network. The limits of development and grading would cover approximately 50 percent of the 2,652-acre subarea. The remaining 50 percent of the site would comprise an open space preserve, including a trail system, which is functionally equivalent with the adopted City of San Diego Multiple Species Conservation Program (MSCP). There would be a potential increase in the maximum number of dwelling units (up to 5,456) should the private high school site, junior high school, and one of the elementary school sites be redesignated for residential uses.

The major circulation element roads consist of Carmel Valley Road, Del Mar Heights Road, Camino Santa Fe, and SR-56 freeway corridor. Subarea Plan 1 includes SR-56 "Alignment F" as described in the SR-56 revised draft EIR, which is currently being prepared by the City of San Diego.

b) Subarea Plan 2 (SR-56 Alignment "D")

Subarea Plan 2 incorporates a more northerly alignment for SR-56. This alignment, referred to as Alignment "D" in the SR-56 revised draft EIR, traverses Pacific Highlands Ranch in a diagonal manner and alters the backbone circulation system and land use plan proposed under Plan 1 and the Framework Plan. Figure 3-2 of the MEIR shows the proposed land use plan under this scenario. Subarea Plan 2 includes up to 4,974³ new residential dwelling units; a ~~Town Center and Village~~ area with the same uses described above on the south side of SR-56; three elementary schools; two neighborhood parks; a community park; ~~a community green civic use area~~; one junior high ~~and an optional junior high school~~, one public and one private high school; an employment center; a public library; a double fire station; and the associated public facilities and transportation network. As with Subarea Plan 1, the limits of development and grading would cover approximately 50 percent of the 2,652-acre subarea, and the remaining 50 percent of the site would comprise an open space preserve which is functionally equivalent with the adopted City of San Diego MSCP. The open space preserve would include a trail system. As described for Plan 1, there would be a potential increase in the maximum number of dwelling units (up to 5,414) should the private high school site, junior high school, and one of the elementary school sites be designated for residential uses.

The major circulation element roads also consist of Carmel Valley Road, Del Mar Heights Road, Camino Santa Fe, and SR-56 freeway corridor. However, the transition from Del Mar Heights Road to Carmel Valley Road would represent a more linear west to east route which generally parallels the SR-56 alignment through the site. The intersection of Del Mar Heights Road and Carmel Valley Road would be east and north of the Subarea Plan 1 location and Camino Santa Fe would become a much longer and

more circuitous route south of SR-56. Access to the Town Center and Village area would be via Camino Santa Fe south of the freeway rather than from Del Mar Heights Road on the north side of SR-56, and the Camino Santa Fe/SR-56 interchange would be approximately 4,000 feet northeast of the location shown in Plan 1.

The project's major components are described in detail below for each plan.

2) MSCP Open Space

An important component of the proposed land use plan for Pacific Highlands Ranch is the natural open space system and its relationship to the regional biological open space preserve design. As part of the approved City of San Diego MSCP, a Multiple Habitat Planning Area (MHPA) subarea plan has been adopted for the region, including the project area. The natural open space system for Pacific Highlands Ranch is proposed to establish a system of wildlife corridors and habitat areas consistent with the MSCP. The open space preserves shown for both of the subarea plans discussed below are generally consistent with the MHPA.

This open space design would also be consistent with the open space system described as the "Environmental Tier" in the City's adopted 1991 Framework Plan. The "Environmental Tier" was established in the Framework Plan to preserve and protect sensitive biological resources, floodways, and important topographic features (ridges, canyons, and hillsides). The open space configuration shown under the Environmental Tier, which included the placement of SR-56 along Santa Monica Ridge/McGonigle Canyon, has been superseded with the City's adoption of the MSCP and establishment of MHPA preserve boundaries for Subarea III. The adopted MSCP includes Santa Monica Ridge/McGonigle Canyon as part of a large habitat block extending to Los Peñasquitos Preserve, while SR-56 is shown as extending through the preserve. The natural open space described below under both subarea plans is considered functionally equivalent with the adopted MSCP and would exceed the acreage of open space shown in the Framework Plan's Environmental Tier and would locate much of the SR-56 alignment in the development areas north of the MHPA. The design and configuration of the MSCP preserve open space precludes the need for designing an open space system which uses the Framework Plan Environmental Tier's "habitat protection zones," "biological buffer zones," and "transition zones." This terminology is superseded by formal adoption of the MSCP.

Even though SR-56 is being realigned to largely eliminate impacts to the MHPA, it is important to note that the placement of SR-56 through Pacific Highlands Ranch is addressed and allowed in the adopted MSCP and that impacts to sensitive species and vegetation types are allowed as long as appropriate mitigation is provided. SR-56 is a

project that is covered under the MSCP. Mitigation for the impacts associated with SR-56 is addressed in the revised EIR for SR-56.

In addition to the implementation of the MHPA in Pacific Highlands Ranch, the MHPA boundary adjustment includes properties within the Carmel Valley Precise Planning Area (Neighborhoods 8A and 10) and the NCFUA Subarea V (Deer Canyon and Lorenz Parcel). Lands would be added to the MHPA within Neighborhood 8A and acreage would be removed within Neighborhood 10. Approximately 8.41 acres of Tier II and Tier III habitats would be removed from the MHPA within Neighborhood 10. The acreage within Neighborhood 8A (Parcels A and B) contains largely Tier I habitats. The addition of these lands to the MHPA would greatly increase the size of the habitat block planned for Carmel Valley geographic area, improving the overall preserve design and configuration, and providing greater assurances that scarce vegetation types (i.e., southern maritime chaparral) would be maintained over the long term. The addition of a relatively large block of mostly Tier I habitat within Carmel Valley Neighborhood 8A would result in a MHPA that would be functionally equivalent ~~superior~~ to that shown in the MSCP Subarea Plan.

a) Subarea Plan 1

Subarea Plan 1 would include a total of ~~1,317~~ 1,297 acres of open space. This total ~~would~~ includes approximately 1,268 acres of MHPA undisturbed open space which is functionally equivalent with the adopted MSCP preserve design as described in the City of San Diego MHPA subarea plan. The remaining open space acreage consists of active uses (e.g., parks and schools) and the urban amenity features.

The proposed development area for Subarea Plan 1 would be expanded into the defined MHPA open space boundary by approximately 149.9 acres. Any encroachment into the MHPA associated with the SR-56 alignment is addressed in a separate EIR for SR-56. The encroachment area from the land uses shown for Plan 1 is spread across the subarea and described below:

- Both sides of the east-west urban amenity;
- The north-south urban amenity;
- Gentle slopes above McGonigle Canyon at the eastern boundary
- North-facing slopes above La Zanja Canyon;
- East of the approved Del Mar Highland Estates subdivision and south of the existing off-site Senterra development;

- Along the edges of the north-south wildlife corridor between Gonzales and McGonigle Canyons.

The proposed expansion into the MHPA has been reviewed by all interested conservation and community planning groups. Numerous meetings and site visits were held with these groups (e.g., Sierra Club, Carmel Valley Community Planning Board, and the Endangered Habitats League) in 1997 and 1998 to develop a plan which accommodated regional biological conservation goals.

The natural open space system proposed for Subarea III would establish a system of wildlife corridors and habitat areas. The on-site open space system would preserve the habitats and major wildlife corridors south of SR-56 (i.e., Deer and McGonigle Canyons and Santa Monica Ridge) and provide a desired northerly linkage/wildlife corridor via a north-south tributary canyon to Gonzales Canyon. This north-south corridor is part of the regional wildlife preserve system and grading (to be revegetated) would be required to create this linkage with undercrossings beneath Del Mar Heights Road. Gonzales Canyon proceeds westerly through the Del Mar Highlands Estates PRD property and drains into the San Dieguito River valley. Undercrossings are proposed beneath SR-56 and Del Mar Heights Road to facilitate wildlife movement. The steep north-facing slopes above La Zanja Canyon and the San Dieguito River valley along the northern boundary of the subarea would also be a component of the natural open space system.

b) Mitigation Land Banks

In order to effectuate the boundary adjustments to the MHPA, a mitigation bank would be established over approximately 100 acres of land within the Pardee ownership in Pacific Highlands Ranch. The bank will consist of disturbed land that will be revegetated in accordance with the ~~master~~ master-conceptual revegetation plan. Restored habitats will consist of appropriate wetland and upland habitats. The City will direct project applicants needing mitigation in the North City area to purchase credits in this bank, and will accept land from this bank into the MHPA upon purchase of credits by a third party. The bank will be processed and approved expeditiously by the City in a manner that will enable establishment costs to be kept to a minimum.

For areas to be restored, a conceptual revegetation summary which outlines the general criteria and maintenance requirements to be included in a more detailed master revegetation plan for Pacific Highlands Ranch is an appendix to this EIR. Restored lands included in the mitigation bank would be maintained as required in the master revegetation plan until credits are sold and the land conveyed to the City for MHPA purposes. Upon conveyance, the City would assume responsibility for management and maintenance.

A mitigation bank covering approximately 20 acres within Parcel A of Carmel Valley Neighborhood 8A would also be established as a component of the MHPA boundary adjustment process.

Urban Amenity Open Space

The open space system under Subarea Plan 1 would also include approximately 20 acres of "urban amenity" open space that would be located primarily in the upper reaches of Gonzales Canyon. This east-west open space amenity area would be relatively narrow and would be intended to provide visual relief, linear park with recreation benefits, and pedestrian links. The urban amenity will complement the biologically oriented expanses of the open space system by encouraging human use outside the areas where the most valuable natural resources are restored and preserved. This area would not be intended to function as part of the natural habitat system. The urban amenity does, however, protect and preserve the wetland habitat in the upper reaches of Gonzales Canyon. The proposed urban amenity corridor would provide open space links between neighborhoods, public facilities, and activity centers.

Neighborhood Parkway Areas

Subarea Plan 1 includes two neighborhood parkways as integral components of the community-wide system for pedestrian movement. The neighborhood parkways would provide visual relief, recreation benefits, and pedestrian links. The primary neighborhood parkway is a north-south corridor that would connect McGonigle Canyon and the MHPA open space south of SR-56 to the urban amenity and Gonzales Canyon in the north. The neighborhood parkway would be approximately 100 feet wide. The secondary neighborhood parkway would also be approximately 100 feet wide and would connect the Town Center Village to the northern neighborhoods, the east-west urban amenity, and the MHPA open space in La Zanja Canyon. Also, this neighborhood parkway would be adjacent to the neighborhood park and elementary school north of the Town Center Village, and would provide future residents an alternative access route to these facilities.

Open Space Trails Systems

Pacific Highlands Ranch would also include a plan for an extensive system of trails within the overall open space system. The trail system would include hiking, biking, and equestrian trails that connect with existing paths within the built neighborhoods. The trails would be located within the MHPA preserve as allowed by the adopted MSCP.

Open Space Overlook (Trail Heads)

Subarea Plan 1 identifies three open space overlooks with educational signage and benches that will be maintained by the proposed Landscape Maintenance District.

MHPA Preserve Management

The proposed subarea plan also describes the management requirements for the various components of the open space system. Pursuant to the adopted MSCP, the preserve would be dedicated to the City of San Diego and the long-term management of the preserve would be the responsibility of the City. A Habitat Management Plan would be prepared for lands dedicated by the project applicant and incorporated into the subarea plan.

c) Subarea Plan 2

The open space system shown for Subarea Plan 2 is similar to Plan 1. However, with the more northerly alignment of SR-56, the interface with the MHPA open space along the southern portion of the site along McGonigle Canyon would be replaced by residential land uses rather than the freeway corridor forming the southern limit of development. In addition, the Del Mar Heights Road crossing of the north-south open space corridor linking McGonigle Canyon with Gonzales Canyon would be northerly of the location shown in Subarea Plan 1. This corridor would also be narrowed in the southwest corner of the project site. Overall, the encroachment into the MSCP preserve would be increased from approximately 149.9 acres to 212.0 acres under Plan 2. Gonzales Canyon corridor would remain unchanged from Plan 1. However, the primary neighborhood parkway corridor would be shifted to the west abutting the boundary of the public high school and would replace the north-south urban amenity proposed in the Framework Plan. The secondary neighborhood parkway would also abut the neighborhood park and elementary school in the northern portion of Pacific Highlands Ranch; however, it would not be connected to the ~~Town Center Village~~. This neighborhood parkway would provide a corridor to the MHPA open space areas of Gonzales Canyon to the east and La Zanja Canyon to the north. Three open space overlooks would be included in this plan as well.

The proposed development area for Subarea Plan 2 would be expanded into the defined MHPA open space boundary by approximately 212.0 acres. This total encroachment area is spread across the subarea and is similar to the encroachment described above for Plan 1. The major difference is in the southern portion of the site above McGonigle Canyon as described below.

- Both sides of the east-west urban amenity;
- Both sides of the north-south urban amenity;
- Gentle slopes above McGonigle Canyon at the eastern boundary;
- Gentle slopes above McGonigle Canyon in the south-central portion of the site;

- Gentle slopes above McGonigle Canyon at the western boundary;
- North-facing slopes above La Zanja Canyon;
- East of the approved Del Mar Highland Estates subdivision and south of the existing off-site Senterra development;
- Along the edges of the north-south wildlife corridor between Gonzales and McGonigle Canyons.

As with Plan 1, the natural open space system proposed under Plan 2 would also establish a system of wildlife corridors and habitat areas functionally equivalent with the MSCP. The on-site open space system would preserve the habitats and major wildlife corridors south of SR-56 (i.e., Deer and McGonigle Canyons and Santa Monica Ridge) and provide a desired northerly linkage/wildlife corridor via a north-south tributary canyon to Gonzales Canyon. Undercrossings are proposed beneath SR-56 and Del Mar Heights Road to facilitate wildlife movement. The steep north-facing slopes above La Zanja Canyon and the San Dieguito River valley along the northern boundary of the subarea would also continue to be a component of the natural open space system. Plan 2 also incorporates trails as shown in Figure 3-11 of the MEIR.

3) Residential Element

The residential component of Subarea III would consist of a variety of lot sizes and product types. The proposed densities would range from estate (0.25-1 dwelling units per acre [du/ac]) to the high density residential areas associated with the Village area of the ~~Town Center~~ Village (34 du/ac). This element would also comply with the affordable housing requirements of the Framework Plan. Fulfillment of this objective may be satisfied by:

- A set aside of no less than 20 percent of the units for occupancy by, and at rates affordable to, families earning no more than 65 percent of median area income, adjusted for family size, or
- Dedicating developable land of equivalent value.
- Residential development of more than 10 dwelling units must satisfy the City's Affordable Housing requirements. This requirement should be satisfied through the provision of affordable housing on-site.
- Residential development of 10 or fewer housing units and residential development falling within the estate and very low density residential categories may, at the

discretion of the City, satisfy the affordable housing requirements by donating to the city an amount of money equivalent to the cost of achieving the required level of affordability, into an NCFUA Affordable Housing Trust Account administered by the San Diego Housing Commission

The residential design features of each of the subarea plans are described below.

a) Subarea Plan 1

Subarea Plan 1 would encourage a diverse mix of residential densities and product types. Approximately 4,974 new residential dwelling units would be allocated to Pacific Highlands Ranch under this land use plan. The residential units would be distributed throughout the subarea, and the proposed diversity of housing types would be intended to increase housing choice and affordability. A balanced distribution of housing types is proposed, with approximately 63.6 percent (3,161 units) of the units proposed as single-family and 36.4 percent (1,813 units) proposed as multi-family units.

The highest density of residential uses (34 du/ac) would occur within the Village of the Town Center (maximum of 500 dwelling units at build-out). The areas adjacent to the Town Center Village are shown as "core residential" (9-14 du/ac) on the land use plan and would be located adjacent to the Town Center Village, north of SR-56 and south of Carmel Valley Road. These two densities would comprise the attached multi-family product types which total approximately 1,813 units (36.4 percent). The remainder of the residential units would consist of detached single-family units in a variety of lower densities: very low, low, and peripheral residential. The very low density (0.25-1 du/ac) residential areas would be primarily located in a non-contiguous portion of the subarea, along the western boundary of Del Mar Highlands Estates. Low density (2-5 du/ac) uses would be primarily sited north of Carmel Valley Road. "Peripheral residential" (5-9 du/ac) densities would be generally located along the SR-56 corridor and the area immediately north of the Town Center Village. There would also be small areas of low density, and peripheral residential which accompany the existing Rancho Glens Estates very low density development south of the SR-56 alignment. Overall, the residential densities proposed would be less intense the further away from the Town Center Village but each residential component would be integrated into the plan by trails, bikeways, urban amenity open space, and streets. The trail system would accommodate walking, biking, and jogging activities and would provide access to the Town Center Village, civic areas, schools, and parks. The subarea plan would also include design principles which address open space, setbacks, garage siding, street patterns, and housing types and density.

b) Subarea Plan 2

Subarea Plan 2 would incrementally increase the allowed number of dwelling units up to 4,974~~0~~ new residential units, with approximately 65 percent (3,240) being single-family and 35 percent (1,734~~3~~) being multi-family. The more northerly alignment of SR-56 substantially would alter the residential layout under Plan 2 by narrowing the developable area between the freeway alignment and the Del Mar Heights Road/Carmel Valley Road corridor. The width between the Del Mar Heights Road/Carmel Valley Road corridor and the Gonzales Canyon urban amenity to the north would also be restricted. Because of these physical parameters, the resulting residential land use pattern in the northern portion of the subarea would generally consist of smaller and narrower residential development areas.

The residential uses south of the SR-56 alignment would also differ in the central portion of the subarea from Plan 1 because of the relocation of the freeway and the movement of the ~~Town Center Village~~. The residential densities and locations are generally similar to Plan 1 at the eastern and western portions of the site. However, the low density residential development shown at the southwestern boundary would be extended to the southern boundary under Plan 2 and access to the existing CUP would be from the west rather than from Camino Santa Fe on the east.

4) Town Center Element

The Pacific Highlands Ranch land use plan would include a Town Center, which would be generally located east of the intersection of Del Mar Heights Road and Carmel Valley Road. This land use designation would allow for a combination of commercial, office, high density residential, and public uses. The Town Center and its relationship to each of the land use plans are described below. The Town Center would be pedestrian-oriented providing retail, commercial, and employment uses for the Pacific Highlands Ranch. The 215-acre Town Center includes ~~approximately 1,500 to 1,730~~ dwelling units, up to 300,000 square feet of retail and office space, a 50-acre senior high school, a 20-acre junior high school, a community park, a ~~65-acre community green~~civic use area, and a 200,000-square-foot employment center. Within the Town Center is the Village. The Village consists of residential, commercial, and civic uses and is discussed below.

a) Subarea Plan 1

The Village component of the Town Center would consist of approximately 150,000 square feet of commercial retail uses, 150,000 square feet of commercial office uses, 500 high density residential units, ~~a town green (4 acres)~~, and a civic uses area (5 acres) on approximately ~~343~~ acres at the northeast quadrant of the SR-56/Camino Santa Fe interchange. The Village would be readily accessible via SR-56 and would be immediately east of the Del Mar Heights Road/Carmel Valley Road intersection and

would include a transit center ~~at the core of~~ in the civic use area. This area also would be served by the extensive system of pedestrian and bicycle paths. ~~A The civic use area~~ (i.e., pedestrian plaza and library) would also be proposed in the ~~Town Center Village~~, and core residential and a 613-acre community park are adjacent to the Village. Other allowable uses within the Village would include child care centers, community centers, and churches. Design principles for the Village are would be included in the subarea plan.

Employment Center

An approximately 200,000-square-foot employment center and a park-and-ride facility would be proposed on a 20-acre site south of the Village in the Town Center, north of the SR-56/Camino Santa Fe interchange. Access to the facilities located in the Village and surrounding land uses would be provided for by the incorporation of pedestrian connections and street systems in the design of the plan.

b) Subarea Plan 2

The acreages and square footages associated with each of the Town Center and Village area land uses would be similar to those described for Subarea Plan 1 above. However, with the northerly freeway location and shifting of the SR-56/Camino Santa Fe interchange to the east, the Town Center Area would be located on the south side of the freeway. Camino Santa Fe would border the ~~Town Center Village~~ on the east rather than the west and would provide access to the various uses. The 20-acre community park would be moved to the east of Camino Santa Fe and the Village and adjacent to the senior high school and the SR-56 interchange with Carmel Valley Road.

Employment Center

The employment center under Subarea Plan 2 would not be adjacent to the Village and would be shifted to the northeast quadrant of the Camino Santa Fe/SR-56 interchange. The acreage would be 16 acres but the square footage would be similar to that described for Subarea Plan 1.

5) Community Facilities Element

Public facilities that would be provided within Pacific Highlands Ranch include schools, a library, safety services (fire), and parks. Overall, Pacific Highlands Ranch would require one community park, three elementary schools; two neighborhood parks, a junior high (and an optional junior high school site); a public and private high school; a public library; and a fire station. The private high school would include a community parish church that would replace St. William of York on Del Mar Trails Road. As described above, some of these public facilities would be sited within the Town Center Village area. Other community facilities would be located throughout the subarea.

6) Circulation Element

The major arterial circulation system within Pacific Highlands Ranch would consist of Carmel Valley Road, Del Mar Heights Road, Camino Santa Fe, and State Route 56. The alignment and configuration of each of the arterial facilities would generally be consistent with the adopted Framework Plan. However, the Framework Plan alignment for SR-56 is southerly from the two alignments addressed in this EIR. This other alignment, referred to as the central alignment, is addressed as an alternative to the proposed project in Chapter 6. With the movement of SR-56 into the development area, the precise alignments of the major on-site arterials have been refined in the subarea plans. As proposed in the subarea plans, both Carmel Valley Road and Del Mar Heights Road would be constructed as six-lane major arterials. Camino Santa Fe would extend southerly from SR-56 as a four-lane arterial. As proposed by the City, SR-56 would be a six-lane freeway with one interchange within Pacific Highlands Ranch. The circulation system for Pacific Highlands Ranch is based upon one interchange at Camino Santa Fe, and has been thoroughly reviewed and approved by the City Engineer. However, the development of an additional interchange along SR-56 is not precluded, but will result in necessary plan amendments to accommodate changes in the land use plan.

The precise alignment of the freeway alignments and other project area roadways are described for each land use plan below. It should be noted that another northerly alignment is included in the revised EIR for SR-56 (City of San Diego 1998). This alignment, described as the northern alignment, is similar to the "F" alignment associated with Subarea Plan 1. As such, any modifications to the proposed land use in plan 1 for Subarea III to accommodate this "northern" alignment would be within the range of alternatives addressed in the EIR, the two EIRs prepared for SR-56, and the NCFUA Framework Plan EIR.

a) Subarea Plan 1

Del Mar Heights Road would enter Pacific Highlands Ranch from the Carmel Valley community and terminate at its intersection with Carmel Valley Road. Del Mar Heights Road is designated in the General Plan and the Framework Plan for ultimate improvement in its current location as a six-lane major arterial with a 1220-foot right-of-way. Subarea Plan 1 would be consistent with this designation and alignment. In order to facilitate wildlife movement, a bridge on Del Mar Heights Road would be proposed over the north-south MSCP open space corridor just west of its intersection with Carmel Valley Road.

Carmel Valley Road would be extended northeasterly from its intersection with Del Mar Heights Road to the eastern boundary of the subarea. This alignment roughly parallels the SR-56 alignment shown in Subarea Plan 1. Carmel Valley Road would extend southerly to Camino Santa Fe at SR-56. Camino Santa Fe proceeds to the southern

boundary of the subarea. As with Del Mar Heights Road, a bridge would be provided on Camino Santa Fe south of SR-56 to allow east-west wildlife movement within the MSCP corridor along the southern boundary of the subarea.

SR-56 shown for Subarea Plan 1 represents "Alignment F" as presented in the draft EIR for the middle segment of SR-56 currently being prepared by the City. SR-56 crosses the entire NCFUA in an east-west direction, connecting Interstate 5 and Interstate 15. The easternmost and westernmost segments of SR-56 (2.3 and 1.8 miles long, respectively) are located outside of the NCFUA and already have been completed. Beginning at the western subarea boundary, this alignment primarily traverses disturbed agricultural land and proceeds northeasterly, north of the existing Rancho Glens Estates subdivision, and then easterly to the eastern project boundary. An interchange is proposed at Camino Santa Fe.

Subarea Plan 1 would also provide a system of bicycle, pedestrian, and equestrian routes. The pedestrian and bicycle routes would connect the Town Center, public parks, and residential areas. The bikeways would also connect with the city-wide bikeway system. Equestrian trails would be provided within the MSCP open space which would provide linkages to the existing off-site trail systems to the north and south of Pacific Highlands Ranch.

b) Subarea Plan 2

The basic circulation components required in the Framework Plan would also be incorporated into Plan 2 with the more northerly alignment of SR-56 (Alignment "D"). The major circulation element roads would continue to consist of Carmel Valley Road, Del Mar Heights Road, Camino Santa Fe, and State Route 56 freeway corridor. However, Alignment "D" would traverse Pacific Highlands Ranch in a diagonal manner and alter the backbone circulation system proposed under Plan 1.

Specifically, the transition from Del Mar Heights Road to Carmel Valley Road would be more linear from east to west and would roughly parallel SR-56 approximately 800 feet north of the freeway alignment. This east-west roadway through the subarea would be north of the Plan 1 location, as Del Mar Heights Road would trend northeasterly rather than southeasterly to the intersection with Carmel Valley Road. The intersection of Del Mar Heights Road and Carmel Valley Road would be approximately 2,400 feet east and approximately 3,000 feet north of the Subarea Plan 1 location. With this change the Camino Santa Fe/SR-56 interchange would also be north and east of the Plan 1 location.

7) Implementation and Phasing

The Pacific Highlands Ranch Plan would be implemented through the proposed phase shift, General Plan/Framework Plan Development Agreement, master rezoning, and the processing of future specific development proposals within subarea NCFUA. The Pacific Highlands Ranch Plan would describe these processes and provide detailed design principles for each of the proposed zone designations in the subarea. The proposed design principles are cited in this MEIR as part of the recommended mitigation measures.

8) Anticipated Future Projects

It is the intent of this MEIR to streamline future environmental review of subsequent development (tentative maps) by analyzing the potential impacts of the Pacific Highlands Ranch Plan at a level that will be sufficient for future projects where possible and to provide a framework for future impact analysis and mitigation consistent with this MEIR. Anticipated future projects would include tentative subdivision maps for the 1,665-acre Pardee Construction Company ownership, a conditional use permit for a private high school and parish church on the 54-acre Catholic Diocese~~Church~~ ownership, development plans for the designated elementary school and high school sites by the affected school districts, and tentative subdivision maps for the several other ownerships within the subarea.

At the time a future project is submitted, the City will prepare an Initial Study to determine whether the project may cause any significant impact that was not examined in this MEIR and whether the project was described as being within the scope of the Pacific Highlands Ranch Plan. If it is determined that the subsequent project will have no additional significant impacts and no new or additional mitigation measures or alternatives are required, then written findings can be made based on the Initial Study and no new environmental document will be required. If the Initial Study findings cannot be made, then either a Mitigated Negative Declaration or Focused EIR will be required as specified in CEQA Sections 21157.5 and 21158. Use of this MEIR is further limited in accordance with CEQA Section 21157.6.

This MEIR also analyzes the discretionary actions needed for the future actions (i.e., community plan and precise plan amendments, tentative map revisions, rezonings, planned development permits, etc.) associated with the Precise Plan for Carmel Valley Neighborhood 10. The environmental impacts associated with those revisions are addressed in the Biology, Traffic, and Landform Alteration sections of this MEIR. All other potential impacts are insignificant. The EIRs previously prepared for Carmel Valley Neighborhood 10 are incorporated herein by reference. Additional environmental action or consideration associated with revisions to Neighborhood 10 necessary to

implement the future discretionary actions described in the contemplated Development Agreement would not be necessary.

9) Discretionary Approvals Required

Discretionary approvals required by the City of San Diego for Subarea III would include a General Plan Amendment and NCFUA Framework Plan Amendment, adoption of the subarea plan, master rezoning, a North City Local Coastal Plan Amendment, Development Agreement, MSCP Subarea Plan Amendment and MHPA boundary adjustments and conferring Third Party Beneficiary status. In addition to City Council approval of the GPA and phase shift in conjunction with Subarea III Plan approval, the GPA and phase shift must be approved by a majority vote of the city's electorate in a general election. Each of the necessary approvals by the City Council and approvals/permits that may be required from other agencies are discussed below:

General Plan Amendment/NCFUA Framework Plan Amendment: An amendment to the adopted General Plan/NCFUA Framework Plan is required to reflect the refinements to the subarea boundary, land uses (location, acreage, and residential densities), Environmental Tier size and configuration, and circulation pattern (e.g., State Route 56 alignment) proposed in the subarea plan.

Pacific Highlands Ranch Subarea Plan Approval: This action includes adoption of the land use plan proposed in the subarea plan and the approval of a Public Facilities Financing Plan (PFFP). The PFFP identifies the funding mechanisms and timing for the construction of the necessary public facilities within the subarea. These facilities may include arterial roadways, bridges, transit facilities, libraries, parks, police and fire stations, and drainage facilities.

Master Rezoning: The existing zoning within Subarea III consists almost entirely of agricultural zoning (A-1-10). The proposed master rezoning for the subarea is shown in Figures 3-17 (Plan 1) and 3-18 (Plan 2) of the MEIR. These zones would become effective with voter approval of a phase shift.

~~**MHPA Boundary Adjustment:** This action would amend the City's MHPA to include the sensitive habitats located in Neighborhood 8A while removing other less sensitive areas within Subarea III from the preserve system. In addition, Third Party Beneficiary Status would be conferred to allow development in sensitive resources.~~

~~**North City Local Coastal Program (LCP) Amendment:** The portion of Pacific Highlands Ranch within the Coastal Zone is under the jurisdiction of the California Coastal Commission. An amendment to the adopted LCP would be required to bring the LCP land use plan into conformance with the adopted subarea plan.~~

MHPA Boundary Adjustment: This action would amend the City's MHPA to include the sensitive habitats located in Neighborhood 8A and Subarea V (Deer Canyon and Lorenz Parcels) of the NCFUA while removing other less sensitive areas within Pacific Highlands Ranch (approximately 150 acres) and Carmel Valley Neighborhood 10 (approximately 8.4± acres) from the preserve system. The Third Party Beneficiary Status already granted for Neighborhood 10 with the City's approval of the MSCP Subarea Plan will remain and would include the 8.4±-acre boundary adjustment. Concurrence by the wildlife agencies is required for the MHPA boundary adjustment. In addition, Third Party Beneficiary Status would be conferred to allow development in sensitive resources.

The boundary adjustment components include the conveyance of high-quality habitat in Carmel Valley Neighborhood 8A and Subarea V (Deer Canyon and Lorenz Parcel) by Pardee to the City, and an adjustment of the MHPA line to increase the size of the preserve within the Neighborhood 8A area. The MHPA would also be adjusted to delete largely disturbed habitat from the Pacific Highlands Ranch Subarea and Carmel Valley Neighborhood 10. The effect of these revisions to the MHPA would be to increase the preservation of very rare Tier I resources while allowing development on less sensitive disturbed and natural areas within Pacific Highlands Ranch and Neighborhood 10. Thus, the proposed MHPA boundary adjustment under the proposed subarea plan is considered superior in biological value to the adopted MHPA. No further action by the City or wildlife agencies is required.

At Carmel Valley Neighborhood 8A (Parcels A and B), approximately 150 acres would be conveyed by Pardee, of which 55 acres of Tier I habitat would be added to the MHPA. An additional 20 acres within Parcel A may be added to the MHPA in the future should the City decide not to use this acreage for school/park uses. The addition of these lands to the MHPA would greatly increase the size of the habitat block planned for this particular geographic area, improving the overall preserve design and configuration, and providing greater assurances that scarce vegetation types (i.e., southern maritime chaparral) would be maintained over the long term.

North City Local Coastal Program (LCP) Amendment: The portion of Pacific Highlands Ranch within the coastal zone is under the jurisdiction of the California Coastal Commission. An amendment to the adopted LCP would be required to bring the LCP land use plan into conformance with the adopted subarea plan.

Future Discretionary Actions: A Development Agreement is contemplated which includes the components described above for the MHPA boundary adjustment. In addition to the boundary adjustment components, the contemplated Development Agreement would include the following:

- In order to implement the above-described MHPA boundary adjustments, revisions to the Carmel Valley Neighborhood 10 Precise Plan would be necessary. These revi-

sions include an expansion of residential development (22 single-family units) on approximately 8.4+ acres in to the MHPA (Precise Plan Unit 10) and an increase in the number of multi-family units from 98 to 250 (Precise Plan Unit 10). The revisions to the Neighborhood 10 Precise Plan, tentative maps, and rezonings would be implemented subsequently by City Council action.

- Transfer of an additional 6 dwelling units in Subarea V from the Deer Canyon Parcel (approximately 60 acres) to the Lorenz Parcel (approximately 78 acres). This will allow construction of 46 dwelling units on the Lorenz Parcel.
- Transfer of title to the Deer Canyon Parcel to the United States Government or an agency thereof as may be directed by the City of San Diego.
- Establishment and approval by the City and wildlife agencies of a 20-acre mitigation land bank on Parcel A in Neighborhood 8A within Carmel Valley community planning area.
- Establishment and approval by the City and wildlife agencies of a 100-acre mitigation land bank in Subarea III of the NCFUA.
- Transfer of title to Parcel A and B within Neighborhood 8A of Carmel Valley to the City by Pardee, exclusive of those areas utilized for the 20-acre mitigation land bank.
- Pardee will convey to the City MHPA land within Subarea III exclusive of the area utilized for the mitigation land bank in Subarea III.

Other Discretionary Permits: Responsible and trustee agencies may include the U.S. Fish and Wildlife Service (USFWS) and the California Department of Fish and Game (CDFG). Because the coastal California gnatcatcher is listed as a threatened species, authorization by the USFWS and CDFG is required prior to any “take” of coastal sage scrub. The City of San Diego has the authority to issue authorizations for “take” of the California gnatcatcher pursuant to federal Endangered Species Act. Development of the project site as proposed may require placement of fill within wetlands which would require a permit from the U.S. Army Corps of Engineers pursuant to Section 404 of the Clean Water Act. In addition, alteration of streambeds by project grading may require a 1601/1603 agreement from the CDFG.

C. Environmental Setting

The topography of Pacific Highlands Ranch ranges from approximately 40 feet above mean sea level (MSL) in Gonzales Canyon at the northwestern corner to approximately 428 feet above MSL in the southeastern corner of the subarea. Mesas, gently sloping

hillsides, and canyons traverse the project site. The main topographic features on the project site include Gonzales Canyon in the northeast, McGonigle and Deer Canyons and Santa Monica Ridge in the southern portion of the site, and Del Mar Mesa along the southern site boundary. The project site is located within the watersheds of La Zanja Canyon to the north, Gonzales Canyon to the west, and McGonigle Canyon to the south. Runoff from the project site drains through these canyons either to Carmel Valley in the south or into the San Dieguito River to the north.

Existing land uses within Pacific Highlands Ranch include extensive agricultural acreage, several nurseries, horse ranches, scattered large-lot single-family homes associated with the agricultural/nursery operations, an approved borrow area, trailers used as nursery/agricultural worker housing, a pet housing facility, and a 29-unit single-family residential development known as Rancho Glens Estates along Caminito Mendiola. The nursery operations are mainly located along Black Mountain Road and grow flowers, palms, and other plants for landscaping purposes. The prime agricultural product in the project area is pole tomatoes. A north-south San Diego Gas & Electric (SDG&E) power line easement containing a high-power overhead electrical distribution line extends along the eastern boundary. Also, a main water line and two trunk sewer lines traverse the site. The remaining on-site acreage includes roads and open space, much of which is in a disturbed condition.

A variety of vegetation types occur within Pacific Highlands Ranch, including Diegan coastal sage scrub, southern maritime chaparral, grasslands, eucalyptus woodlands, coyote bush scrub, southern mixed chaparral, scrub oak chaparral, and riparian communities (southern sycamore riparian woodland, mule fat scrub, southern willow scrub, and southern riparian scrub). In addition, 15 sensitive plant species and 8 sensitive animal species have been observed on the property.

Access to Pacific Highlands Ranch is currently provided by Black Mountain Road, which traverses the site in an east/west direction between Del Mar Heights Road and Rancho Peñasquitos. Carmel Valley Road also provides access to the western portion of the site from the current terminus of SR-56. Regional access to the subarea is from I-5 via Del Mar Heights Road and SR-56.

Land uses surrounding Pacific Highlands Ranch consist primarily of open space and residential uses. Specifically, the Del Mar Country Club (golf course and estate residential uses), Fairbanks Ranch (estate residential), Senterra development (low density residential), The Lakes project (estate residential in the county of San Diego), and a nursery occur along the northern boundary. Vacant undeveloped lands within Torrey Highlands (Subarea IV) and Del Mar Mesa (Subarea V) exist adjacent to Pacific Highlands Ranch on the east and south, respectively. Shaw Ridge Road (dirt) parallels the southern boundary off-site within Subarea V. The surrounding land uses to the west

consist of low density residential development within the Carmel Valley community planning area both north and south of Carmel Valley.

D. Environmental Analysis

Table S-1 summarizes the results of the environmental analysis completed for the project.

E. Growth Inducement

The 2,652-acre Pacific Highlands Ranch project site is located in an area of approximately 12,000 acres identified as the North City Future Urbanizing area. All lands in the NCFUA are designated as agricultural (with A-1-10 zoning) on an interim basis to prevent premature urbanization and protect environmental and fiscal resources by precluding leapfrog development. A Framework Plan for the NCFUA has been adopted by the City as an amendment to the General Plan. This plan would permit the development of up to 14,780 residential units in the NCFUA, including 5,4260 units within Pacific Highlands Ranch. Implementation of the Framework Plan is dependent on a phase shift from "future urbanizing area" to "planned urbanizing area."

If such a "phase shift" is approved by the City Council, the amendment would be brought to the voters in a city-wide election for final action in accordance with Proposition A, the Managed Growth Initiative (R-264708, 12-16-85). A subarea plan for Pacific Highlands Ranch must also be prepared and adopted by the City prior to development at the densities permitted in the Framework Plan.

The Growth Inducement section of the Final EIR for the NCFUA Framework Plan (City of San Diego 1992b) concluded that implementation of the Framework Plan would have a significant growth-inducing impact. While this is also true for either of the proposed Pacific Highlands Ranch plans, the NCFUA Framework Plan addressed buildout of Pacific Highlands Ranch with up to 5,4260 dwelling units and 400,000 square feet of commercial and office space. Both proposed subarea plans (Plan 1 and Plan 2) would develop less than 5,000 dwelling units and 400,000 square feet of commercial and office space and are, therefore, consistent with the Framework Plan.

Nevertheless, the proposed Pacific Highlands Ranch plans would still remove obstacles to growth by providing infrastructure facilities in previously undisturbed areas, as described in the Framework Plan EIR. In conclusion, either of the proposed subarea plans would have a growth-inducing impact on the area.

**TABLE S-1
SUMMARY OF ENVIRONMENTAL ANALYSIS RESULTS**

Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
LAND USE			
1. Would the proposed project implement the goals, objectives, and recommendations of the City of San Diego Progress Guide and General Plan and the environmental goals of the Framework Plan for the North City Future Urbanizing Area? Would the proposed project implement existing City plan and policies?	Both proposed plans are generally consistent with the intent of the General Plan, environmental goals of the adopted NCFUA Framework Plan, Council Policy 600-40, and the North City LCP. The lack of compliance with the preservation of agricultural lands and the unmitigated direct traffic impacts identified in this MEIR represent a significant direct and cumulative land-use impact.	Only the No Project alternative would avoid the cumulative land use impacts associated with the loss of agricultural lands.	Significant, not mitigated.
2. Would the Pacific Highlands Ranch Plan result in a conflict of the purpose and intent of the Resource Protection Ordinance?	Both subarea plans have been prepared consistent with the requirements of City Council Policy 600-40. However, both plans would not be consistent with the encroachment provision of RPO as they apply to steep slopes, wetlands, and significant prehistoric sites. As such, this would represent a direct and cumulative significant land use impact.	Both subarea plans have been designed to minimize impacts to RPO-sensitive resources; however, strict compliance with the development regulations of the ordinance would require a project redesign. The plans' inconsistency with the RPO encroachment provisions can be avoided with implementation of the No Project alternative and mitigated to below a level of significance by adoption of a RPO alternative.	Significant, not mitigated.
3. Would the project result in a conflict with the purpose and intent of any current planning process or adopted environmental plans or policies for the area?	Both Plan 1 and 2 for Pacific Highlands Ranch would accommodate the trail system goals in the FPA, especially in the area of Gonzales Canyon. Therefore, they are considered consistent with the goals and objectives of the FPA.	No mitigation is required.	Not significant.

TABLE S-1
SUMMARY OF ENVIRONMENTAL ANALYSIS RESULTS
(continued)

Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
LAND USE (cont.)			
4. Would the project be compatible with existing and planned uses in the project vicinity. Would the uses in the proposed subarea result in any internal land use conflicts?	<p>The interface of the proposed on-site uses under both land use plans for Pacific Highlands Ranch would not represent a significant land use compatibility impact with existing adjacent uses.</p> <p>The identified potential internal land use compatibility impacts in conjunction with the SR-56 alignment are considered potentially significant. The significance of this impact is also described in the Revised Draft EIR for the Middle Segment of SR-56. Also, the proposed extension of Carmel Valley Road could result in significant land use incompatibilities with the proposed Pacific Highlands Ranch residential developments along these roadways.</p>	<p>No mitigation is required for the interface of the proposed Pacific Highlands Ranch plans with existing off-site land uses and planned land uses surrounding Subarea III.</p> <p>Mitigation for the potential internal land use compatibility impacts associated with proposed land uses and the SR-56 freeway would consist of the requirement for landscaping and noise attenuation measures at the time tentative maps are processed.</p>	<p>Not significant.</p> <p>Less than significant.</p>
5. How is the project consistent with the City of San Diego's Multiple Species Conservation Program (MSCP) Subarea Plan?	The Pacific Highlands Ranch Plan would provide for a preserve area that is functionally equivalent with the MHPA proposed in the adopted MSCP. No significant adverse effects to MSCP implementation would result through implementation of either Subarea Plan.	No mitigation is required.	Not significant.

TABLE S-1
SUMMARY OF ENVIRONMENTAL ANALYSIS RESULTS
(continued)

Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
TRAFFIC			
1. What direct and/or cumulative traffic impacts would the project have on the existing and planned community and regional circulation networks?	<p>Table 4B-14 of the MEIR shows the on- and off-site roadway segments and intersections adversely affected by the proposed project. In those cases where the project traffic does not exceed 2 percent of the total traffic, direct traffic impacts are considered less than significant. In those cases where the project traffic exceeds 2 percent of the total traffic, direct traffic impacts are considered significant. When the roadway segment or intersection is currently failing, a significant direct and cumulative traffic impact would occur.</p> <p>Also, the project would add to area freeway waiting time where the wait already exceeds 15 minutes. These impacts are shown on Table 4B-14 and are considered significant; however, mitigation is beyond the scope of the applicant or the City.</p>	<p>Table 4B-14 of the MEIR includes all of the area's transportation improvements necessary to reduce project impacts (direct and cumulative) to the extent feasible; however, as shown in the fourth column of the table, not all impacts are reduced to below a significant level. In that event, only adoption of the No Project alternative would avoid all of the project's significant direct and cumulative traffic impacts.</p>	Significant, direct and cumulative impacts.

TABLE S-1
SUMMARY OF ENVIRONMENTAL ANALYSIS RESULTS
(continued)

Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
BIOLOGICAL RESOURCES			
1. Would the proposed project, including compliance with the City's Brush Management Program, result in impacts to important habitat or to sensitive plant and animal species.	The direct, indirect, and cumulative impacts to sensitive biological resources are considered significant. The significant impacts include loss of MSCP Tier I and Tier II habitats, direct and cumulative loss of riparian scrub wetland habitats and impacts to sensitive plant and animal species identified in Chapter 4.C, Biology of this MEIR.	The significant direct and indirect impacts to upland biological resources would be mitigated to below a level of significance through conformance and implementation of the MSCP. The MSCP impacts and mitigation requirements are shown in Tables 4C-4 and 4C-5 of the MEIR. Table 4C-4 shows the mitigation requirements for Plan 1 and Table 4C-5 shows the mitigation requirements for Plan 2. These tables separate the mitigation requirements for the Pardee ownership and the non-Pardee ownerships. The identified mitigation ratios are per the adopted MSCP based on the vegetation type (Tier Designation) being impacted. As these tables indicate, there is adequate acreage on-site to mitigate for Pardee's direct impacts. Other mitigation requirements which would be implemented at the time future tentative maps to deal with direct and indirect impacts are outlined in Chapter 4.C, Biology, Issue 1 of this MEIR.	Direct impacts are significant, but mitigated. Cumulative impacts to grasslands and wetlands will remain significant and unmitigated
2. Would implementation of the Pacific Highlands Ranch Plan result in interference with the movement of any resident or migratory wildlife species?	Both Subarea Plans 1 and 2 accommodate the wildlife corridors identified in the MSCP (i.e., McGonigle Canyon, Gonzales Canyon, and the north-south linkage between the two). Impacts on wildlife movement would not be significant.	No mitigation is required other than the City's management and monitoring responsibilities as described in the MSCP.	Not significant.

TABLE S-1
SUMMARY OF ENVIRONMENTAL ANALYSIS RESULTS
(continued)

Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
BIOLOGICAL RESOURCES (cont.)			
3. Would the project affect the long-term conservation of biological resources?	Both subarea plans would provide for a regional open space system that is functionally equivalent with the MHPA proposed in the adopted MSCP. In addition, Pardee Homes will dedicate natural land located within Carmel Valley Neighborhoods 8A and 8C as discussed in Chapter 4.C, Biology. The addition of these lands to the MHPA would greatly increase the size of the habitat block planned for this particular geographic area, improving the overall preserve design and configuration, and providing greater assurances that scarce vegetation types (i.e., southern maritime chaparral) would be maintained over the long term. No significant adverse effects to biological diversity would result through implementation of either Subarea Plan.	No mitigation is necessary.	Not significant.

TABLE S-1
SUMMARY OF ENVIRONMENTAL ANALYSIS RESULTS
(continued)

Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
HYDROLOGY/WATER QUALITY			
1. What modification to the natural drainage system would be required for implementation of the Pacific Highlands Ranch Plan? Would the project result in changes in the rate and amount of runoff?	Construction activities in Pacific Highlands Ranch could result in significant erosion, siltation, and water quality impacts. The increase in runoff volume and velocity due to the introduction of streets, roads, and other hardscape surfaces could result in significant adverse erosion, water quality, and flooding impacts to existing natural drainage courses and the Carmel Valley storm drain system. However, these impacts are mitigable to below a level of significance by incorporating the City's BMPs and standard engineering practices.	Incorporation of the measures outlined in the Hydrology section of the Final MEIR (e.g., Storm Water Pollution Prevention Program, energy-dissipating structures, desilting basins, and National Pollutant Discharge Elimination System (NPDES) requirements) shall be specified in the grading plan and conditions of approval for future VTMs.	Less than significant.
2. Would the project result in alterations to the course or flow of floodwaters?	Impacts to the course and flow of floodwaters are mitigable to a level of less than significant through the incorporation of the mitigation measures and BMPs identified in the Hydrology section of the Final MEIR.	Impacts to floodwaters would be mitigated to a level of less than significant by incorporating the mitigation measures and BMPs identified for Issue 1 above. All flood control measures would be reviewed and approved by the City's Transportation and Drainage Design Division of the Public Works Business Center prior to construction.	Less than significant.

TABLE S-1
SUMMARY OF ENVIRONMENTAL ANALYSIS RESULTS
(continued)

Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
HYDROLOGY/WATER QUALITY (cont.)			
3. What affect would implementation of the plan have on water quality of the San Dieguito River and Los Peñasquitos Creek, and Carmel Valley River Enhancement Project drainage basins?	Impacts to floodwaters would be mitigated to a level of less than significant by incorporating the mitigation measures and BMP measures identified in Hydrology, Issue 1, of this MEIR. All flood control measures would be reviewed and approved by the City's Transportation and Drainage Design Division of the Public Works Business Center prior to construction. The proposed project's effects would be less adverse overall than those currently resulting from commercial agricultural activities on-site.	<p>Direct impacts to water quality would be mitigated to a level of less than significant by incorporating the mitigation measures identified for Hydrology, Issue 1, of this MEIR.</p> <p>Incorporation of the mitigation measures identified in Hydrology, Issue 1, of this MEIR would not mitigate fully the associated cumulative effects to water quality in the subarea. Only the No Project alternative would avoid potential cumulative significant impacts.</p>	<p>Less than significant.</p> <p>Significant, unmitigated cumulative impacts.</p>

TABLE S-1
SUMMARY OF ENVIRONMENTAL ANALYSIS RESULTS
 (continued)

Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
LANDFORM ALTERATION/VISUAL QUALITY			
1. Would implementation of the plan result in substantial alteration of the existing character of the area?	Uses under either proposed subarea plan would substantially alter the existing aesthetic character of the proposed site. This change represents a significant direct and cumulative impact from on- and off-site locations. The development of the project site would incrementally contribute to the change in aesthetic character of the subregion in conjunction with the existing and planned development in Carmel Valley and Subareas IV and V.	Implementation of the landscaping concepts incorporated in future tentative maps, and the preservation of MSCP and urban amenity open space would reduce the identified aesthetic impacts; however, not to a level of less than significant. Avoidance of the associated impacts would be accomplished by the No Project alternative	Significant, unmitigated direct and cumulative impact.
2. Would implementation of the plan result in a substantial change in topography or ground surface relief features?	Both grading concepts associated with the proposed land use scenarios would require substantial alteration of the topography to develop and access the site. Alterations to the existing topography, the filling of drainages, and the grading of broad mesas are considered significant direct and cumulative landform alteration impacts.	Prior to the issuing of a grading permit, the Development Service Department shall review the grading plans for consistency with the Subarea Plan guidelines. Mitigation measures such as slope rounding and blending techniques to achieve a more natural looking appearance would reduce the associated impacts, but not below a level of significance. The No Project alternative would avoid the landform alteration impacts.	Significant, unmitigated direct and cumulative impacts.

TABLE S-1
SUMMARY OF ENVIRONMENTAL ANALYSIS RESULTS
(continued)

Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
LANDFORM ALTERATION/VISUAL QUALITY (cont.)			
3. Would implementation of the plan result in the loss, covering, or modification of any unique geologic or physical features, such as canyons, bluffs, or hillside with a slope gradient in excess of 25 percent?	Based on the steep slope encroachment analysis prepared for both subarea plans, significant impacts are anticipated on canyons, bluffs, or hillsides in Pacific Highlands Ranch.	Although both subarea plans have been designed to minimize impacts to steep slopes, strict compliance with the encroachment thresholds in the development regulations of RPO would require a project redesign. Both plans' inconsistency with the RPO encroachment provisions can be avoided with implementation of the No Project alternative and mitigated to below a level of significance by adoption of a RPO alternative. These alternatives are discussed in Chapter 8 of this EIR.	Significant unmitigated.
4. Would implementation of the plan result in the loss of any distinctive landmark tree(s) or a stand of mature trees?	No significant impacts are anticipated.	No significant impacts are anticipated, therefore, no mitigation is required.	Not significant.
CULTURAL RESOURCES			
1. Would implementation of the Subarea Plan adversely affect archaeological or historical resources?	Four sites in the project area have been found to be potentially eligible for nomination to the National Register of Historic Places, 24 sites have been found not significant, 6 sites are in open space areas and	Mitigation of the significant cultural resource sites will require implementation of a sampling program of sufficient size to collect a representative sample of the information available at these sites. This program should include a phased sampling program based on a comprehensive treatment plan prepared to the satisfaction of the	Less than significant..

TABLE S-1
SUMMARY OF ENVIRONMENTAL ANALYSIS RESULTS
(continued)

Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
CULTURAL RESOURCES (cont.)			
	<p>should be indexed prior to recording Tentative Maps for future projects, 2 sites are in open space and may be potentially significant and require additional evaluation, and 1 site is located outside of the project boundaries and will require some evaluation when a project is proposed for this property.</p> <p>The resulting loss of all of the sites on this project is considered a significant cumulative loss of cultural resource information. The destruction of a number of these sites prior to indexing or testing of any kind constitutes a significant impact as important information, which may have been present in these sites has been lost without record.</p>	<p>City of San Diego. The extent of testing and excavation will be based upon the information collected and analyzed during each phase of investigation. Data recovery shall be completed to the satisfaction of the City of San Diego. The cumulative loss of cultural resources would be significant and unmitigated.</p>	<p>Cumulative impacts are significant, unmitigated</p>
AIR QUALITY			
<p>1. Would implementation of the Pacific Highlands Ranch Plan affect the ability of the County to meet federal clean air standards according to the Regional Air Quality Strategy?</p>	<p>a) Construction Emissions. Dust control during grading operations would be regulated in accordance with the rules of the San Diego APCD and the regulations of the City of San</p>	<p>No significant direct air quality impacts are anticipated with approval of the proposed project. Therefore, no mitigation is required.</p>	<p>Not significant.</p>

TABLE S-1
SUMMARY OF ENVIRONMENTAL ANALYSIS RESULTS
(continued)

Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
AIR QUALITY (cont.)			
	Diego Land Development Ordinance. Additionally, construction would be phased and construction of each phase would be a one-time, short-term activity. Air quality impacts due to construction of the proposed project would not be significant.		
	b) Developed Condition Emissions. The proposed project would be consistent with the RAQS and would not create direct traffic impacts to the surrounding street system provided that the recommended road improvements are constructed. Therefore, direct air quality impacts would not occur if the proposed project were implemented.	No significant direct air quality impacts are anticipated with approval of the proposed project. Therefore, no mitigation is required.	Not significant.
	The proposed project would result in significant cumulative air quality impacts under the City's significance thresholds as discussed in Chapter 6 of this EIR.	Cumulative air quality impacts can not be mitigated at the project level. Only the No Project Alternative would avoid the <u>proposed project's contribution to cumulative impacts</u> .	Significant, unmitigated.

TABLE S-1
SUMMARY OF ENVIRONMENTAL ANALYSIS RESULTS
(continued)

Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
AIR QUALITY (cont.)			
	c) Forecasted Traffic Conditions. Development of the proposed project would not directly result in roadway or intersection levels of service below D. Therefore, no significant direct air quality impacts are anticipated. Cumulative air quality impacts would be significant.	No significant direct air quality impacts would be anticipated with approval of the proposed project. No mitigation is available for cumulative air quality impacts at the project level. The project's contribution to cumulative air quality impacts is discussed in Chapter 6 of this EIR. The No Project alternative would avoid potential significant air quality impacts..	Direct impacts are not significant. Cumulative impacts would be significant, unmitigated.
GEOLOGY/SOILS/EROSION			
1. Are there geologic soils or conditions in the subarea which would present a constraint to development?	No significant soil or geologic conditions were observed or are known to exist which would preclude development of the subarea. However, potentially significant geologic conditions exist which require mitigation, including ancient landslides, expansive soils, unstable cut slopes, alluvial soils, poorly consolidated soils, and ground shaking due to an earthquake.	For each specific development application in Pacific Highlands Ranch, the City will require the applicant to submit a detailed geotechnical study by a qualified geotechnical firm. The conclusions and implementation of the recommendations provided in these reports would mitigate the potentially significant effects of soil and geologic conditions for future developments in Pacific Highlands Ranch to below a level of significance. The types of mitigation requirements which the feasibility studies are likely to contain are summarized in Chapter 4.H, Geology, of this MEIR.	Less than significant.
2. Would development of the site increase the potential for erosion?	Future grading activities for the implementation of specific development projects in Pacific Highlands Ranch would result in a potentially significant increase in soil erosion.	Prior to the approval of a grading permit, each applicant for a specific development project in Pacific Highlands Ranch shall prepare a grading/construction management plan. The City's Development Services Business Center staff must approve the grading/construction management plans before a grading permit is issued. The mitigation	Less than significant.

TABLE S-1
SUMMARY OF ENVIRONMENTAL ANALYSIS RESULTS
(continued)

Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
GEOLOGY/SOILS/EROSION (cont.)			
		measures listed in the Geology/Soils/Erosion Issue 2, and those listed in the Hydrology/Water Quality section of this MEIR will be incorporated in the plans.	
NATURAL RESOURCES			
1. Would implementation of the Pacific Highlands Ranch Plan result in the conversion of agricultural land to nonagricultural uses or impairment of existing agricultural productivity?	As described in the NCFUA Framework Plan EIR, the direct impacts to prime agricultural resources on the project site from open space preservation and development are considered significant. The incremental loss of land being used for agriculture is also considered a significant cumulative impact and is identified as such in Chapter 6 of this MEIR.	Only implementation of the No Project alternative would reduce the identified agricultural resources impact to below a level of significance.	Significant, not mitigated
2. Would implementation of the project result in the prevention of future extraction of sand and gravel and/or mineral resources?	The loss of the potential for recovery of mineral resources from mineral resource zones classified by the state as significant (MRZ-2) has the potential to be a significant, long-term impact. However, there is no history of mining activity in	No mitigation of direct impacts would be required. Only the No Project Alternative would avoid potential cumulative significant natural resource impacts.	Direct impacts are not significant. Cumulative impacts are significant, not mitigated.

TABLE S-1
SUMMARY OF ENVIRONMENTAL ANALYSIS RESULTS
(continued)

Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
NATURAL RESOURCES (cont.)			
	Pacific Highlands Ranch and no known sensitive mineral resources in Pacific Highlands Ranch would be excavated and removed or covered with development as part of plan implementation. Rather, they would be retained in perpetuity as open space areas. Therefore, no potentially significant direct impacts are anticipated. However, the potential exists for significant cumulative impacts.		
PALEONTOLOGICAL RESOURCES			
1. To what extent would implementation of the Pacific Highlands Ranch Plan result in the loss of paleontological resources?	The potential for significant fossils to occur in the formations of the subarea plan is moderate to high in all areas planned for development of the Pacific Highlands Ranch Plan; therefore, the grading necessary to implement the subarea plan could result in significant impacts to paleontological resources.	The Pacific Highlands Ranch Plan would require that all future tentative maps and VTMs approved include a condition for the implementation of a monitoring and salvage program for the recovery of paleontological resources during development. The program shall follow the mitigation measures identified in the Paleontological Resources section of this MEIR. The identified mitigation measures would reduce the potential impacts to below a level of significance. Prior to subarea plan approval, the Development Services Business Center shall verify that the above mitigation measures are incorporated in appropriate sections of the subarea plan. These measures shall be conditions of subsequent tentative maps and VTMs and development proposals.	Less than significant.

TABLE S-1
SUMMARY OF ENVIRONMENTAL ANALYSIS RESULTS
(continued)

Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
NOISE			
1. Would existing or future noise levels resulting from the proposed project adversely impact sensitive noise receptors in and around the project area?	Noise levels are anticipated to exceed applicable standards for all residential uses immediately adjacent to SR-56 and the major roadways, as well as to proposed school and park uses. Noise levels could exceed 70 CNEL for professional and office building land uses depending on their placement relative to the roadways. Noise levels for commercial retail land uses are not expected to be exceeded unless they are located immediately adjacent to SR-56. Where noise levels exceed applicable exterior standards, noise impacts would be significant.	Mitigation of noise levels could be accomplished through the construction of noise barriers. However, due to the limited grading detail available at this stage of planning, it is not possible to determine specific barrier heights and locations. At the time that detailed grading plans are available for the future subdivisions within Subarea III, detailed acoustical analyses shall be performed to determine the exact barrier heights and locations where required. If exterior noise levels within residential areas are found to be above 60 CNEL after mitigation, then detailed interior noise analyses will be required as well.	Less than significant.
PUBLIC FACILITIES AND SERVICES			
1. How would implementation of the Subarea Plan affect public services, particularly schools, parks, libraries, and police and fire protection?	Currently, all the schools expected to serve the project are operating above capacity. Implementation of either of the proposed plans for the subarea would create an increased demand for educational facilities.	<u>The development of the proposed on-site elementary, junior high, and high schools would accomplish mitigation of the project's direct impact to schools from the subarea plan. School facilities financing and mitigation agreements between the affected school districts and the project applicant would be required at the time the Subarea Plan is</u>	Less than significant.

TABLE S-1
SUMMARY OF ENVIRONMENTAL ANALYSIS RESULTS
(continued)

Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
PUBLIC FACILITIES AND SERVICES (cont.)			
	This is considered a significant direct and cumulative impact.	<u>approved by the City Council to ensure that the impacts on school facilities are mitigated to a level less than significant. In addition, prior to granting a ministerial or discretionary entitlement for a parcel, such parcel shall be subject to the terms of a mitigation agreement entered into by the landowner and the applicable School Districts or included in a community facilities district established by the applicable School Districts and authorized to fund the acquisition of school sites and construction of schools.</u> Mitigation of the project's direct impacts to schools expected to serve the subarea would be accomplished by the development of the proposed on-site schools. At the time tentative maps are processed, agreements between the affected school districts, the applicant, and the City would be required to ensure that impacts on educational services are mitigated to below a level of significance.	
	Development of the subarea plan would incrementally increase the demand for parks, recreation, library, police, and fire services; however, both subarea plans	No mitigation for parks, library, and police services is required as facilities are provided in the proposed subarea plans or in surrounding areas.	Not significant.

TABLE S-1
SUMMARY OF ENVIRONMENTAL ANALYSIS RESULTS
(continued)

Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
PUBLIC FACILITIES AND SERVICES (cont.)			
	<p>provide sites for the development of library, park, and fire facilities. The resultant increased demand upon these services would not constitute a significant impact on parks, library, and police services.</p> <p><u>Significant impacts would occur to fire services.</u></p>	<p><u>Until the new fire station is operating, developers shall demonstrate to the satisfaction of the City Fire Department that a response time of six minutes or less from Fire Station 24 to all portions of new developments can be achieved. For those areas of such new developments where a six-minute response time cannot be provided, individual sprinkler systems or other construction or site design safeguards, approved by the Fire Department, shall be required prior to the issuance of building permits.</u></p>	
2. Would implementation of the plan result in the use of excessive amounts of water, resulting in the depletion of domestic water supplies or the generation of excessive amounts of wastewater? Would the proposed plan result in the generation of excessive amounts of solid waste?	<p>Development of the proposed plan would result in potentially significant impacts to existing water and sewer facilities. However, the existing regional infrastructure would be sufficient to provide the water and sewage effluent needs of the proposed subarea.</p>	<p>Future developers shall be required to provide appropriate water studies consistent with the findings and conclusions of the Miramar 712/North City 610 Water Study. Each developer shall be responsible for installing all those facilities identified in the accepted studies which are necessary to serve their developments.</p> <p>Prior to any new development within the subarea, developers shall be required to provide sewer studies showing the proposed sewer system for the subarea.</p> <p>All public water facilities shall be designed and constructed according to the most current edition of the City of San Diego Water and Sewer Design Guide.</p>	Less than significant.

**TABLE S-1
SUMMARY OF ENVIRONMENTAL ANALYSIS RESULTS
(continued)**

Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
PUBLIC FACILITIES AND SERVICES (cont.)			
	The generation of solid waste during the construction of the project and the ongoing waste generated by the residential, commercial, and industrial uses of the development would result in an incremental increase for solid waste services.	Incorporation of the measures outlined in Chapter 4.L, Public Services Issue 3 of this MEIR will reduce the potential impacts the City's waste management services to below a level of significance.	Less than significant.
WATER CONSERVATION			
1. Would implementation of the plan result in the use of excessive amounts of water, resulting in the depletion of domestic water supplies or the generation of excessive amounts of wastewater?	It is not anticipated that excessive amounts of water consumption or wastewater generation would result from the implementation of the proposed plan. The City of San Diego Water Utilities Department Planning and Design Guide and Landscape Technical Manual guidelines would be incorporated into the proposed plans. <u>Nevertheless, the project would contribute to a regional cumulative impact associated with water supplies.</u>	No mitigation is required <u>for direct impacts to water supplies but mitigation measures shall be incorporated into project design guidelines to address cumulative water usage concerns:</u> a. <u>Limit grading in areas where no construction is proposed; thereby reducing the need for planting and irrigation of graded areas.</u> b. <u>Provide lifts of low-clay content soil in landscaped areas to improve infiltration.</u> c. <u>Reduce runoff potential from landscaped areas by using berming, raised planters, and drip irrigation systems.</u>	

**TABLE S-1
SUMMARY OF ENVIRONMENTAL ANALYSIS RESULTS
(continued)**

Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
WATER CONSERVATION (cont.)			
		<ul style="list-style-type: none"> d. <u>Install soil moisture override systems in all common irrigation areas to avoid sprinkling when the ground is already saturated.</u> e. <u>Identify in the plant materials list in the project design guidelines whether or not plants are native or naturalize easily and incorporate a list of local California sources for native plants.</u> f. <u>Incorporate low-flush toilets, low-flow faucets, and timers on sprinklers (including nighttime watering) into project design.</u> g. <u>Provide information regarding water conservation measures to new residents at the time of lot purchase.</u> 	Not significant.
PUBLIC SAFETY			
1. Would implementation of the Pacific Highlands Ranch Plan expose people to potential health hazards?	Studies of the potential for adverse public health effects of electromagnetic fields are inconclusive. A statement or conclusion of impacts would be speculative. In accordance with CEQA Section 15145, the known information about electromagnetic fields is summarized and no conclusion of significance is reached.	No mitigation is required.	Not significant.

TABLE S-1
SUMMARY OF ENVIRONMENTAL ANALYSIS RESULTS
(continued)

Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
PUBLIC SAFETY (cont.)			
	Future developments shall provide a hazardous soils assessment to be conducted by a qualified professional to determine if hazardous soils are present on-site. If hazardous soils are found, a remediation plan shall be prepared and approved by the County Department of Environmental Health for the project. The recommendations of the remediation plan shall be implemented as a condition of project approval.	No mitigation is required.	Not significant.
	Because the proposed project contains on-site detention basins to serve the subarea, the potential for public health and safety impacts to future residents within the project site are considered potentially significant.	Mitigation measures for potential increased mosquito populations which will decrease potentially significant impacts to below a level of significance are identified in Chapter 4.H, Public Safety, of this MEIR. Prior to any grading activities, the applicant shall provide a letter from the County Environmental Health Department Vector Surveillance and Control Division (VSCD) to the environmental review manager of Development Review Division verifying that a vector control program has been designed.	Less than significant.

TABLE S-1
SUMMARY OF ENVIRONMENTAL ANALYSIS RESULTS
 (continued)

Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
POPULATION			
1. Would the proposed implementation of either Plan 1 or 2 for Pacific Highlands Ranch alter the planned location, distribution, density, or growth rate of the population?	<p>The Pacific Highlands Ranch Plan and the proposed phase shift from Future Urbanizing to Planned Urbanizing (if approved) would remove a barrier to population growth in the subarea and the rest of the NCFUA. The Pacific Highlands Ranch Plan includes an effective comprehensive development phasing program which would preclude any significant indirect impacts to public services and facilities or traffic congestion.</p> <p>The proposed project is part of a comprehensive subarea planning program designed to anticipate and resolve indirect impacts caused by increased population. In addition, the Pacific Highlands Ranch Plan includes a strong phasing program to stage development to meet the demand for transportation and public services and thus avoid indirect impacts.</p>	Since the identified population impacts are not considered significant, no mitigation measures are required.	Not significant.

F. Project Alternatives

Table S-2 compares the impacts of the proposed project with all the project alternatives.

1) No Project Alternative

The No Project alternative typically implies no development of the project site. This approach would result in the retention of the property in its present condition. As a result, the impacts associated with the proposed Plans 1 and 2 for Pacific Highlands Ranch relating to biological resources, landform alteration/visual quality, agricultural resources, cultural resources, public facilities and services, air quality, noise, and cumulative contribution to traffic congestion would be eliminated.

This alternative would not achieve the goals and objectives of the project and the adopted Framework Plan. The Framework Plan objectives of providing housing, facilities benefit assessment fees, and roads would not be achieved. In addition, the permanent contributions provided by the proposed subarea plans to the MSCP preserve would be eliminated.

2) Alternate Site Design - Plan 1

A conceptual alternative site design for Pacific Highlands Ranch Plan 1 (see Figure 8-1 of the MEIR) has been developed by the City of San Diego which, with the exception of the shown alignment of SR-56, more closely adheres to the land use concept described in the adopted NCFUA Framework Plan (see Figure 4A-1 of the MEIR). Table 8-1 of the MEIR provides a comparison of this alternate design plan's land uses with the one proposed by Plan 1. Like the proposed project, this alternative design for Plan 1 includes a similar number of dwelling units, a mixed use core area consisting of commercial uses, community park, various residential densities, and a civic area; a high school, a fire station; and the associated public facilities and transportation network. The site design also includes a junior high school, but does not include an elementary school or neighborhood park. In addition, the alternative design includes moderately low residential densities which are not included in the proposed Plan 1.

Other differences affect the high school which would be shifted away from the MUC to a location further east and north of Carmel Valley Road. The community park and very low-density residential would also be in different locations, and an employment center would not be a component of the alternate plan. Residential development would also be extended south of SR-56 near the western boundary which is shown as MHPA open space in the proposed Plan 1. However, as with the proposed Plan 1, the limits of development and grading would cover approximately 50 percent of the subarea. The remaining 50 percent of the site would comprise the MHPA. Table 8-1 of the MEIR

**TABLE S-2
ALTERNATIVE PROJECTS COMPARISON**

Issue	Proposed Plan 1	Proposed Plan 2	No Project	Alternative Site Design - Plan 1	Alternative Site Design - Plan 2	Non-Phase Shift - Plan 1 Alternative	Non-Phase Shift - Plan 2 Alternative	Non-Phase Shift - Plan 3 Alternative	SR-56 Central Alignment Alternative	Resource Protection Ordinance Alternative
Land Use										
General Plan Consistency	Significant, not mitigated	Significant, not mitigated	Significant, not mitigated	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant
Framework Plan Consistency	Significant not mitigated	Significant not mitigated	Significant, not mitigated	Significant, not mitigated	Significant not mitigated	Significant not mitigated	Significant not mitigated	Significant not mitigated	Significant not mitigated	Significant not mitigated
Consistency with RPO	Significant not mitigated	Significant, not mitigated	Less than significant	Significant, not mitigated	Significant not mitigated	Less than significant	Less than significant	Less than significant	Significant, not mitigated	Less than significant
Compatibility w/SDRRP	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant
Compatibility w/Adjacent Uses	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant
Consistency with MSCP	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Significant, not mitigated	Significant, not mitigated	Significant, not mitigated	Significant, not mitigated	Less than significant
Traffic Circulation	Significant, not mitigated	Significant, not mitigated	Less than significant	Significant, not mitigated	Significant, not mitigated	Less than significant	Less than significant	Less than significant	Significant , not mitigated	Significant, not mitigated
	Significant cumulative	Significant cumulative	Less than significant	Significant cumulative	Significant cumulative	Significant cumulative		Significant cumulative	Significant cumulative	Significant cumulative
Biology										
Habitat/Species Impacts	Significant, mitigated	Significant, mitigated	Less than significant	Significant, mitigated	Significant, mitigated	Significant, mitigated	Significant, mitigated	Significant, mitigated	Significant, mitigated	Significant, mitigated
Wildlife Corridor Impacts	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	significant, mitigated	Less than significant
Impacts to long-term conservation of biological resources	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Significant, not mitigated	Significant, not mitigated	Less than significant	Significant, not mitigated	Less than significant
Hydrology/Water Quality										
Drainage	Significant, mitigated	Significant, mitigated	Less than significant	Significant, mitigated	Significant, mitigated	Significant, mitigated	Significant, mitigated	Significant, mitigated	Significant, mitigated	Significant, mitigated
Downstream Water Quality	Significant, mitigated	Significant, mitigated	Less than significant	Significant, mitigated	Significant, mitigated	Significant, mitigated	Significant, mitigated	Significant, mitigated	Significant, mitigated	Significant, mitigated
Landform Alteration/Visual Quality										
Landform Alteration	Significant, not mitigated	Significant, not mitigated	Less than significant	Significant, not mitigated	Significant, not mitigated	Less than significant	Significant, not mitigated	Significant, not mitigated	Significant, not mitigated	Significant, not mitigated
Visual Quality	Significant, not mitigated	Significant, not mitigated	Less than significant	Significant, not mitigated	Significant, not mitigated	Less than significant	Significant, not mitigated	Significant, not mitigated	Significant, not mitigated	Significant, not mitigated
Impacts to steep slopes	Significant, not mitigated	Significant, not mitigated	Less than significant	Significant, not mitigated	Significant, not mitigated	Significant, not mitigated	Significant, not mitigated	Significant, not mitigated	Less than significant	Significant, mitigated
Impacts to landmark trees	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant	Less than significant
Cultural Resources	Significant, mitigated	Significant, mitigated	Less than significant	Significant, mitigated	Significant, mitigated	Significant, mitigated	Significant, mitigated	Significant, mitigated	Significant, mitigated	Less than significant
Air Quality	Significant, mitigated	Significant, mitigated	Less than significant	Significant, mitigated	Significant, mitigated	Significant, mitigated	Significant, mitigated	Significant, mitigated	Significant, mitigated	Less than significant
Geology/Soils/Erosion										
Geologic Constraints	Significant, mitigated	Significant, mitigated	Less than significant	Significant, mitigated	Significant, mitigated	Significant, mitigated	Significant, mitigated	Significant, mitigated	Significant, mitigated	Significant, mitigated
Soil Erosion	Significant, mitigated	Significant, mitigated	Less than significant	Significant, mitigated	Significant, mitigated	Significant, mitigated	Significant, mitigated	Significant, mitigated	Significant, mitigated	Significant, mitigated
Natural Resources										
Agricultural land	Significant, not mitigated	Significant, not mitigated	Less than significant	Significant, not mitigated	Significant, not mitigated	Less than significant	Less than significant	Less than significant	Less than mitigated	Significant, mitigated
Sand/gravel/mineral resources	Significant, mitigated	Significant, mitigated	Less than significant	Significant, mitigated	Significant, mitigated	Less than significant	Less than significant	Less than significant	Less than significant	Significant, mitigated
Paleontology	Significant, mitigated	Significant, mitigated	Less than significant	Significant, mitigated	Significant, mitigated	Less than significant	Less than significant	Less than significant	Less than significant	Significant, mitigated
Noise	Significant, mitigated	Significant, mitigated	Less than significant	Significant, mitigated	Significant, mitigated	Less than significant	Less than significant	Less than significant	Less than significant	Significant, mitigated
Public Facilities and Services	Significant, mitigated	Significant, mitigated	Less than significant	Significant, mitigated	Significant, mitigated	Less than significant	Less than significant	Less than significant	Less than significant	Significant, mitigated
Water Conservation	Significant, mitigated	Significant, mitigated	Less than significant	Significant, mitigated	Significant, mitigated	Less than significant	Less than significant	Less than significant	Less than significant	Significant, mitigated
Public Safety	Significant, mitigated	Significant, mitigated	Less than significant	Significant, mitigated	Significant, mitigated	Less than significant	Less than significant	Less than significant	Less than significant	Significant, mitigated
Population	Significant, mitigated	Significant, mitigated	Less than significant	Significant, mitigated	Significant, mitigated	Less than significant	Less than significant	Less than significant	Less than significant	Significant, mitigated

details the acreages for the proposed land uses and shows that the MHPA acreage would be increased in size under this alternative.

This alternative would reduce impacts to biological resources. The open space design under this alternative, while similar to Plan 1, would differ from the open space under the proposed plan which reflects the refinements as shown in the MSCP for Subarea III. As noted throughout this EIR, the MHPA as defined by the MSCP Subarea Plan has superseded the Framework Plan Environmental Tier. Thus, the additional open space shown in the alternate plan associated with the northern linkage to La Zanja Canyon in the northwest corner of Pacific Highlands Ranch and the retention of eastern on-site portions of Gonzales Canyon differ from the proposed subarea plan. This additional open space would accordingly reduce the impacts to native habitats associated with the proposed Plan 1.

From a circulation standpoint, the major circulation element roads would continue to consist of Carmel Valley Road, Del Mar Heights Road, Camino Santa Fe, and SR-56 freeway corridor ("F" Alignment). The circulation pattern would be similar to the proposed Plan 1, but Camino Santa Fe south of SR-56 would follow a more north-south route through the MHPA. Likewise, Carmel Valley Road, just north of SR-56, would connect to Del Mar Heights Road in a north-south manner. The traffic generation under this alternative would be similar to the proposed Plan 1, and traffic circulation impacts would not substantially differ from the proposed project. This alternative would not create a significant direct traffic impact on the area's circulation system.

3) Alternate Site Design - Plan 2

A conceptual alternative site design for Pacific Highlands Ranch Plan 2 (see Figure 8-2 of the MEIR) has also been developed by the City of San Diego reflecting SR-56 Alignment "D." Like the proposed project, this alternative design for Plan 2 includes a similar number of dwelling units, a mixed use core area consisting of commercial uses, community park, high-density residential, and a civic area; an employment center; a high school, a fire station; and the associated public facilities and transportation network. The alternate site design also includes a junior high school, but does not include an elementary school or neighborhood park. In addition, the alternative design includes moderately low residential densities which are not included in the proposed Plan 2.

Other differences between the proposed Plan 2 and the alternate site design prepared by the City include the shifting of the high school away from the MUC to a location further east and north of Carmel Valley Road. The MUC would be bisected by Camino Santa Fe under this design, and the acreage shown for employment center and specialized commercial uses would be substantially increased along the north side of the SR-56 corridor. The limits of development and grading would cover approximately 50 percent

of the subarea. The remaining 50 percent of the site would comprise the MHPA. Table 8-1 of the MEIR details the acreages for the proposed land uses and shows that the MHPA acreage would be increased in size under this alternative.

The differences in environmental impacts between these plans are minimal and the significance of project-related impacts would not be substantially affected. However, the open space design under this alternative, while similar to Plan 2, would differ from the open space under the proposed plan which reflects the refinements as shown in the MSCP for Subarea III. As noted throughout this EIR, the MHPA as defined by the MSCP Subarea Plan has superseded the Framework Plan Environmental Tier. Thus, the additional open space shown in the alternative plan associated with the northern linkage to La Zanja Canyon in the northwest corner of Pacific Highlands Ranch and the retention of eastern on-site portions of Gonzales Canyon differ from the proposed subarea plan. This additional open space would accordingly reduce the impacts to native habitats associated with the proposed Plan 1. This alternative would reduce impacts to biological resources.

From a circulation standpoint, the major circulation element roads would continue to consist of Carmel Valley Road, Del Mar Heights Road, Camino Santa Fe, and SR-56 freeway corridor ("D" Alignment). However, the alignment of these roadways are less curvilinear north of SR-56 (i.e., Del Mar Heights Road). The traffic generation under this alternative would be similar to the proposed Plan 2. The proposed project would not create a significant direct traffic impact on the area's circulation system.

4) Development without a Phase Shift

The project site could also be developed pursuant to the underlying A-1-10 zoning without a phase shift from Future Urbanizing to Planned Urbanizing. One scenario which could be applied to the project site under the Framework Plan pursuant to Council Policy 600-29 and the Planned Residential Development regulations is development at one dwelling unit per four acres.

A concept plan of a one dwelling unit per four acres with a PRD has been prepared for the Pardee ownership within Pacific Highlands Ranch using three of the SR-56 Alignments: 1) Plan 1 Alignment "F"; 2) Plan 2 Alignment "D"; and 3) the "Central" Alignment. Each concept plan is shown in Figures 8-3, 8-4, and 8-5 of the MEIR, respectively.

For each of these concepts, this alternative would result in approximately 5568 dwelling units, a golf course, driving range, clubhouse, and school park. The total development envelope for the Pardee ownership would occur on approximately 689 acres of the total 1,665-acre Pardee ownership. The residential units would include 416 market rate units

on lot sizes varying from 18,000 square feet to 50,000 square feet and 83 affordable housing units at a density of 20 units per acre. The remaining 855 Pardee acres would remain undeveloped, and as stated in Council Policy 600-29, no future development rights would remain with the property. Each of the other ownerships within Pacific Highlands Ranch (approximately 517 acres) could be developed pursuant to the underlying A-1-10 zoning (one dwelling unit per 10 acres) resulting in approximately 52 additional units for a total of approximately 551 units.

Each of these alternatives could lessen the significant impacts associated with the two proposed subarea plans for Pacific Highlands Ranch. Landform alteration would be substantially reduced with the implementation of this alternative as grading for a golf course in the central portion of the site would be reduced from that necessary for the mixed use core, high school, employment center, and various residential densities. The golf course would also be designed to accommodate the urban amenity. Biologically, the MSCP open space corridor in the northwestern corner of the site would be expanded under this scenario with the elimination of the low-density development area. However, without a phase shift, the MHPA open space as shown in the proposed Subarea Plans 1 and 2 would not be permanently preserved due to the development potential of the remaining A-1-10 ownerships throughout the subarea.

These alternatives would reduce the traffic generation from approximately 55,000-71,010 ADT to approximately 6,660 ADT and the demand on public services and utilities (e.g., police, fire, sewer, water, and schools) would be substantially lessened. Other mitigated impacts of the proposed project, such as impacts to hydrology, cultural resources, geology, paleontology, air quality, noise, and public safety, would be further reduced by implementation of this alternative.

However, development of Pacific Highlands Ranch without a phase shift would have potentially significant land use impacts regarding inconsistencies with the adopted NCFUA Framework Plan. This alternative would not provide the community facilities required in the Framework Plan such as the mixed use core, park and school facilities, and employment center. Also, as noted above, the long-term MSCP preserve regional conservation benefits would not be realized under this alternative.

The major difference among these concept plans is the location of the SR-56 Alignment and the grading associated with the alignment. The non-phase shift land use concepts associated with each alignment are briefly summarized below.

a) Non-Phase Shift Plan 1 (SR-56 Alignment "F")

As shown on Figure 8-3 of the MEIR, this alignment would extend northeast for approximately 2,000 feet to the Carmel Valley Road culvert, then east for approximately 5,000 feet along the north side of McGonigle Canyon, and then northeast for

approximately 6,000 feet within a small canyon that parallels the west side of the existing Rancho Glens Estates subdivision. The future Camino Santa Fe interchange would be located approximately 2,000 feet east of Carmel Valley Road and 1,000 feet north of the confluence of McGonigle and Deer Canyons. A possible second interchange within Subarea III (the third within the proposed middle section of SR-56) could be constructed east of the Rancho Santa Fe Farms Road overcrossing. The total length of this alignment would be 5.6 linear miles.

Plan 1 would locate all but 65 acres of development north of the freeway alignment. A few 30,000 square-foot lots would be located adjacent to the freeway alignment in the western and eastern portion of the site which would require noise attenuation barriers (ranging from 10 to 16 feet in height). By locating the golf course just north of the freeway alignment, noise impacts to the senior high school, community park, and core residential development are eliminated.

b) Non-Phase Shift Plan 2 (SR-56 Alignment “D”)

As shown on Figure 8-4 of the MEIR, this alignment would extend northeast for approximately 2,000 feet to the Carmel Valley Road culvert, then north for approximately 5,000 feet along the east side of Carmel Valley Road, and then northeast for approximately 6,000 feet along a ridge that parallels the south side of Black Mountain Road. The future Camino Santa Fe interchange would be located approximately 2,000 feet east of the existing Carmel Valley Road/Black Mountain Road intersection. The additional interchange and total length of the alignment would be about the same as under Concept Plan 1.

Concept Plan 2 would locate the freeway alignment in the middle of the development essentially dividing the community. With this concept plan as with the proposed Subarea Plan 2, the freeway location results in impacts to more land uses. Preliminary engineering studies estimate cut-and-fill volumes of about 2.5 million cubic yards. Noise attenuation barriers (ranging from 8 to 16 feet in height) would be required on both sides of the freeway and retaining walls would be constructed in the eastern portion of the alignment on the south side.

c) Non-Phase Shift Plan 3 (SR-56 Central Alignment)

As shown on Figure 8-5 of the MEIR, this alignment would begin at the southwest corner of Pacific Highlands Ranch as do the other alternative alignments, but instead of traversing northerly up toward the crest of the canyon, this alignment continues easterly in McGonigle Canyon. Near the intersection of McGonigle and Deer Canyons, the freeway would proceed in a northeast direction along the south facing slope of Santa Monica Ridge. The freeway leaves Pacific Highlands Ranch in the southeast section adjacent to the Torrey Highlands community (Subarea IV).

Since the Central alignment would be separated from the community by open space, there would be a reduction in noise impacts for residential units, schools, and parks, in addition to an incremental reduction in air quality impacts related to freeway traffic (fewer vehicle miles traveled).

5) SR-56 Central Alignment Alternative

This alternative plan to the two proposed subarea plans is included to address the possible adoption of the central alignment for SR-56. The SR-56 central alignment is the most direct route between the western portion of Carmel Valley and the eastern portion of Rancho Peñasquitos.

This alignment would enter Pacific Highlands Ranch in the southwest corner of the planning area as shown in the Figure 8-6 of the MEIR. Topographically, this places the freeway in McGonigle Canyon and adjacent to Carmel Creek. However, while the alignment begins at the southwest corner of Pacific Highlands Ranch as do the other alternative alignments, instead of traversing northerly up toward the crest of the canyon, this alignment continues easterly. Near the intersection of McGonigle and Deer Canyons, the freeway would proceed in a northeast direction along the south facing slope of Santa Monica Ridge within Deer Canyon. The freeway leaves Pacific Highlands Ranch in the southeast section adjacent to the Torrey Highlands Community (Subarea IV).

As shown in Figure 8-6 of the MEIR, the land use plan for the Central alignment alternative is similar to the proposed Subarea Plan 1 with the "F" alignment for SR-56. This alternative would include up to 5,500 residential dwelling units; a Town Center and Village area consisting of commercial uses, retail uses, a community green, high-density residential, and a civic area; an employment center; three elementary schools; two neighborhood parks; a community park; one junior high and two high schools (one private and one public); a public library, a fire station; ~~a police substation~~; and the associated public facilities and transportation network. The limits of development and grading for the land use plan area only would cover approximately 50 percent of the 2,652-acre subarea. Additional disturbance would be required to construct the freeway south of the developed area.

Comparison of Impacts with the Proposed Subarea Plans 1 and 2

Because the proposed number of dwelling units and types of land uses for this alternative are very similar to those proposed in either Subarea Plan 1 or 2, potential impacts related to the size of the development envelope and numbers of vehicle trips generated are similar. The main difference between this alternative and the two proposed Subarea Plans is the location of the SR-56 alignment. In this Alternative the alignment would be located in a sensitive portion of the adopted MHPA but would be separated from the

community by open space. Following is a discussion of those environmental issues most affected by the location of the SR-56 alignment. All other potential environmental impacts are considered essentially similar to either of the proposed subarea plans.

Land Use

In both proposed plans, the freeway would divide the community and the adjacent residential, school, and park uses would experience increased noise and air quality impacts associated with the freeway. Since the central alignment would be separated from the community by open space, there would be a reduction in noise impacts for residential units, schools, and parks, in addition to an incremental reduction in air quality impacts related to freeway traffic (fewer vehicle miles traveled).

Transportation/Traffic Circulation

Like all of the other alignments, this alternative alignment would accommodate projected interregional traffic and would complete a major planned circulation element in the region. While vastly improving regional mobility, there would still be traffic impacts associated with the general growth of the area, not the construction of the freeway. From a traffic perspective this alignment is not very different from either of the Subarea Plan 1 or 2 proposed alignments. Also, the final configuration to have one or two interchanges in Subarea III has little effect on traffic impacts.

Biological Resources

As described in the SR-56 EIR (City of San Diego 1998), adoption of the central alignment would result in significant impacts to biological resources. This alignment would impact a larger portion of sensitive habitat than the other proposed SR-56 alignments because of its location on relatively undisturbed slopes of Deer Canyon. Also, this route would fragment a large portion of the MHPA into 500 and 700 acre portions, compromising the biological integrity of the MHPA. This fragmentation would be a significant unmitigated impact. In addition, this alignment would be a barrier to major wildlife corridors which traverse McGonigle and Deer Canyons. Bridge crossings would be constructed to allow continued wildlife movement.

The central alignment would impact additional areas of sensitive habitat and plants including Diegan coastal sage scrub, scrub oak, chaparral, scrub oak chaparral, southern mixed chaparral, chamise chaparral, non-native grasslands, wetlands, San Diego barrel cactus, and Nuttall's scrub oak. This route would also disturb stands of California adolphia and summer holly. Grading for the alignment would disturb California gnatcatcher territories. Impacts to the above sensitive habitats and species could be mitigated; however, the fragmentation of the MHPA would be a significant and unmitigated impact (City of San Diego 1998). These impacts would not occur under the proposed subarea plans.

Landform Alteration/Visual Quality

Like the proposed Subarea Plans 1 and 2, grading for this alternative would impact a minor area of steep slopes, exceed the city's threshold of 2,000 cubic yards of earthwork per acre; and create manufactured slopes greater than 10 feet high. However, this alternative would result in a freeway alignment with more significant contrast to landform than either of the other subarea plans because of the 80-foot-high cut slope face on the highly visible Santa Monica Ridge. This alternative would also introduce an urban feature into a relatively undisturbed canyon environment, albeit with few sensitive viewers. Thus, the visual contrast between this alignment and the surrounding environment would be substantially increased from the other alignments under Plans 1 and 2. However, because noise impacts to sensitive receivers would be almost entirely avoided under this alignment, the visual impact associated with the noise walls necessary under Plans 1 and 2 would be reduced under the central alignment.

Cultural and Paleontological Resources

It is assumed that the proposed development envelope for the SR-56 central alignment alternative would impact about the same number of significant cultural resource sites as would either the Subarea Plan 1 or 2. However, according to the City draft EIR, the SR-56 central alignment would impact only one sensitive cultural resource site while the Alternative "D" alignment would affect six sites and the Alternative "F" alignment would affect five sites (City of San Diego 1998). According to the same EIR, the central alignment would impact about 25 fewer acres of geologic formations with some paleontological sensitivity. All of the alternatives may be adequately mitigated for significant cultural resources or paleontological impacts with implementation of a CEQA-approved data recovery program.

6) Resource Protection Ordinance Alternative

The identified land use impact associated with the proposed project's inconsistency with the provisions of RPO would be lessened by a project alternative which strictly complies with the encroachment provisions of RPO. Under this scenario, a project alternative that avoids wetland encroachment and floodways, applies wetland buffers adjacent to all wetlands, reduces the excess steep slope encroachment, and avoids impacts to RPO-significant archaeology sites would reduce the identified land use impact (see Land Use, Chapter 4.A, Issue 2). Aside from the land use implications associated with the Framework Plan goals, this alternative would also lessen the other direct and cumulative impacts associated with the proposed Subarea Plans, it is considered environmentally preferable to the proposed projects.

A conceptual alternative land use plan which incorporates these design revisions is shown in Figure 8-7 of the MEIR. Under this conceptual scenario, the number of single-family

units would be reduced by approximately 50 percent as the total on-site development area for residential development and the associated transportation network would be substantially reduced.

Other impacts associated with the proposed subarea plans would also be reduced under the RPO alternative. Impacts to native vegetation and landform alteration/visual quality would be reduced under this alternative. However, substantial earthwork would still be required for the grading for the development areas and the SR-56 alignment, and the impacts would remain significant and unmitigated. With the reduction in dwelling units, the project traffic generation would be reduced from 80,000 ADT to approximately 40,000 ADT. Finally, the demand on public services (schools, parks, police and fire service) and utilities (water, sewer, and solid waste) would be lessened under this alternative.

**FINAL MASTER
ENVIRONMENTAL IMPACT REPORT
FOR THE
PACIFIC HIGHLANDS RANCH (SUBAREA III)
SUBAREA PLAN
IN THE
NORTH CITY FUTURE URBANIZING AREA**

**LDR No. 96-7918
SCH No. 97111077**

JUNE 11, 1998

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B:	Traffic study
C1:	Biological resources report
C2:	Concept revegetation plan
D1:	Cultural resources report (Gallegos & Associates)
D2:	Cultural resources report (RECON)
E:	Noise technical report

Chapter One

Introduction

This Master Environmental Impact Report (MEIR No. 97-7918) addresses the environmental effects associated with implementation of the Pacific Highlands Ranch Plan of the City of San Diego North County City Future Urbanizing Area (NCFUA). This document is informational in nature and is intended for use by City of San Diego decision makers, other responsible or interested agencies, and the general public in evaluating the potential environmental effects of the proposed subarea plan. This MEIR has been prepared by the City of San Diego in compliance with Section 21000 et seq. of the California Environmental Quality Act of 1970, as amended (CEQA); the State CEQA Guidelines (California Code of Regulations, Section 15000 et seq.); and the City of San Diego Guidelines and Format for Environmental Impact Reports (June 1992).

A. Background

The North City Future Urbanizing Area Framework Plan was adopted and the final EIR for the Framework Plan (DEP No. 91-0809) was certified by the San Diego City Council on October 1, 1992. The Framework Plan is a land use policy document that provides general guidelines for development of the 12,000-acre NCFUA, within which Pacific Highlands Ranch is located. The City's Progress Guide and General Plan was amended to incorporate the Framework Plan at the time of its adoption. However, pursuant to the 1985 Managed Growth Initiative (Proposition A), portions of the Framework Plan are not effective until a majority of the voters of the city approve a shift from the Future Urbanizing phase to the Planned Urbanizing phase.

The Framework Plan divides the NCFUA into five subareas, requiring the preparation and approval of detailed subarea plans before development can occur. The purpose of the proposed Pacific Highlands Ranch Plan is to establish a land use plan and an open space system that comply with the requirements of the Framework Plan for the NCFUA and other relevant City plans and policies, including the adopted Multiple Species Conservation Program (MSCP). The Framework Plan requirements for subarea plans include the following:

- Locate specific land uses to achieve the average intensities and land use patterns in the Framework Plan;
- Finalize boundaries of the open space system;
- Determine alignments for roads shown in the Framework Plan;
- Include a school facility financing plan and a City facilities financing plan;
- Designate corridors for nonmotorized transportation including bikeways and equestrian trails;
- Describe how development in the area will satisfy housing requirements;
- Locate public facilities and identify roads necessary to provide access to them;
- Describe how the land uses and policies in the subarea plan and Framework Plan will be implemented; and
- Conform to other City policies and ordinances, including the Resource Protection Ordinance and Council Policy 600-40.

B. Scope of the MEIR and Notice of Preparation

Consistent with Chapter 4.5, Streamlined Environmental Review, of CEQA (Public Resources Code, Sections 21156-21158), an MEIR is being prepared for this project. This MEIR is further intended to be a tiered environmental document building on the previously certified Framework Plan EIR and providing the basis for review and analysis of future projects within the subarea. Both the Framework Plan for the NCFUA, the Framework Plan EIR, and supporting studies are incorporated by reference into this MEIR (CEQA Guidelines Section 15150). These documents are available for review at the City of San Diego Land Development Review Division, 1222 First Avenue, Fifth Floor, San Diego, CA 92101.

The lead agency for this MEIR is the City of San Diego. An Initial Study/scoping letter that addressed the proposed project determined that the proposed Pacific Highlands Ranch Plan may have a significant effect on the environment and that an MEIR should be prepared which would address the following potentially significant issues: land use, transportation/traffic circulation, biological resources, hydrology/water quality, landform alteration/visual quality, cultural resources, air quality, geology/soils, natural

resources/agriculture, paleontological resources, noise, public facilities and services, water conservation, and safety.

Each of Pacific Highlands Ranch's potentially significant environmental effects is presented in Chapter 4. For each issue under analysis, the MEIR contains a discussion of the existing conditions, potential impacts, identification of the significance of the impacts, and mitigation measures for those impacts that are identified as significant. Significant environmental effects that could not be avoided if the project were to be implemented as proposed are identified in the impact section of each topic and briefly summarized at the beginning of this report. Chapters 5, 6, and 7 contain discussions of growth inducing effects, cumulative impacts, and CEQA-mandated discussions areas: the relationship between local short-term uses of the environment and the maintenance and enhancement of long-term productivity; significant irreversible environmental changes; and effects found not to be significant. Alternatives to the proposed project are presented in Chapter 8. The MEIR preparation staff, persons and agencies consulted, and references cited are listed in Chapters 9, 10, and 11. The technical and supporting materials discussed and cited in the text are bound under separate cover in the appendixes.

A Notice of Preparation (NOP) was distributed for the project on November 19, 1997. Responses to comments received during the NOP public review period are incorporated in the text of the EIR in the appropriate locations. The NOP and response letters are included in Appendix A of this document.

C. Uses of this MEIR and Future Project-Specific Review

The Pacific Highlands Ranch Plan MEIR is being prepared and processed concurrently with the Pacific Highlands Ranch Subarea Plan. Appropriate decision makers will consider the information contained in this MEIR when considering the proposed project. The discretionary actions associated with the proposed project include adoption of the subarea plan; amendments to the NCFUA Framework Plan, the City's Progress Guide and General Plan, the Master Rezone, and the North City Local Coastal Program; and various amendments to the Municipal Code.

Because portions of the subarea lie within the Coastal Zone, development within those areas will require individual Coastal Development permits issued by the State Coastal Commission. Certification by the Coastal Commission of the Subarea Plan as an amendment to the Local Coastal Program (LCP) would also be required. Resource Protection Ordinance (RPO) permits would be required for the portions of the subarea that lie outside of the Coastal Zone. In addition, permits from the following agencies may be required to implement future individual development projects with the subarea:

California Department of Fish and Game
U.S. Army Corps of Engineers
U.S. Fish and Wildlife Service
San Diego Regional Water Quality Control Board
San Diego Air Pollution Control District
California Department of Transportation

It is the intent of this MEIR to streamline future environmental review of subsequent development, including tentative maps and development permits, by analyzing the potential impacts of the Pacific Highlands Ranch Subarea Plan at a level that will be sufficient for future projects where possible and to provide a framework for future impact analysis and mitigation consistent with this MEIR. Anticipated future projects would include tentative subdivision maps and planned development permits for the 1,665-acre Pardee Construction Company ownership, a conditional use permit for a private high school on the 54-acre Catholic Church ownership, development plans for the designated elementary school and high school sites by the affected school districts, and tentative subdivision maps for the several other ownerships within the subarea.

At the time an application for a future project is submitted, the City will prepare an Initial Study to determine whether the project may cause any significant impact that was not examined in the MEIR and whether the project was described as being within the scope of the Pacific Highlands Ranch Subarea Plan. If it is determined that the subsequent project will have no new or additional significant impacts and whether the subsequent project was described in the MEIR as being within the scope of the project, then written findings can be made based on the Initial Study and no new environmental document will be required. If the Initial Study findings cannot be made, then either a Mitigated Negative Declaration or Focused EIR will be required as specified in CEQA Sections 21157.5 and 21158. Use of this MEIR is further limited in accordance with CEQA Section 21157.6.

Chapter Two

Environmental Setting

A. Project Location

Pacific Highlands Ranch consists of approximately 2,652 acres located in the northwestern portion of the city of San Diego, approximately one mile east of the city of Del Mar (Figure 2-1). Generally, Pacific Highlands Ranch lies between Interstate 5 (I-5) and Interstate 15 (I-15) in the North City Future Urbanizing Area, as shown in Figure 2-2. It is south of Fairbanks Ranch and the San Dieguito community planning area in the county of San Diego, east of El Camino Real and Carmel Valley and north of Shaw Ridge Road and the Los Peñasquitos Canyon Preserve. Undeveloped Torrey Highlands (Subarea IV) of the NCFUA is located immediately east of the project site.

B. Site Characteristics and Existing Land Uses

The topography of Pacific Highlands Ranch ranges from approximately 40 feet above mean sea level (MSL) in Gonzales Canyon at the northwestern corner to approximately 428 feet above MSL in the southeastern corner of the subarea (Figure 2-3). Mesas, gently sloping hillsides, and canyons traverse the project site. The main topographic features on the project site include Gonzales Canyon in the northeast, McGonigle and Deer Canyons and Santa Monica Ridge in the southern portion of the site, and Del Mar Mesa along the southern site boundary. The project site is located within the watersheds of La Zanja Canyon to the north, Gonzales Canyon to the west, and McGonigle Canyon to the south. Runoff from the project site drains through these canyons either to Carmel Valley in the south or into the San Dieguito River to the north.

Existing land uses within the agriculturally zoned (A-1-10) Pacific Highlands Ranch include extensive agricultural acreage, several nurseries, horse ranches, scattered large-lot single-family homes associated with the agricultural/nursery operations, an approved borrow area, trailers used as nursery/agricultural worker housing, a pet housing facility, and a 29-unit single-family residential development known as Rancho Glens Estates

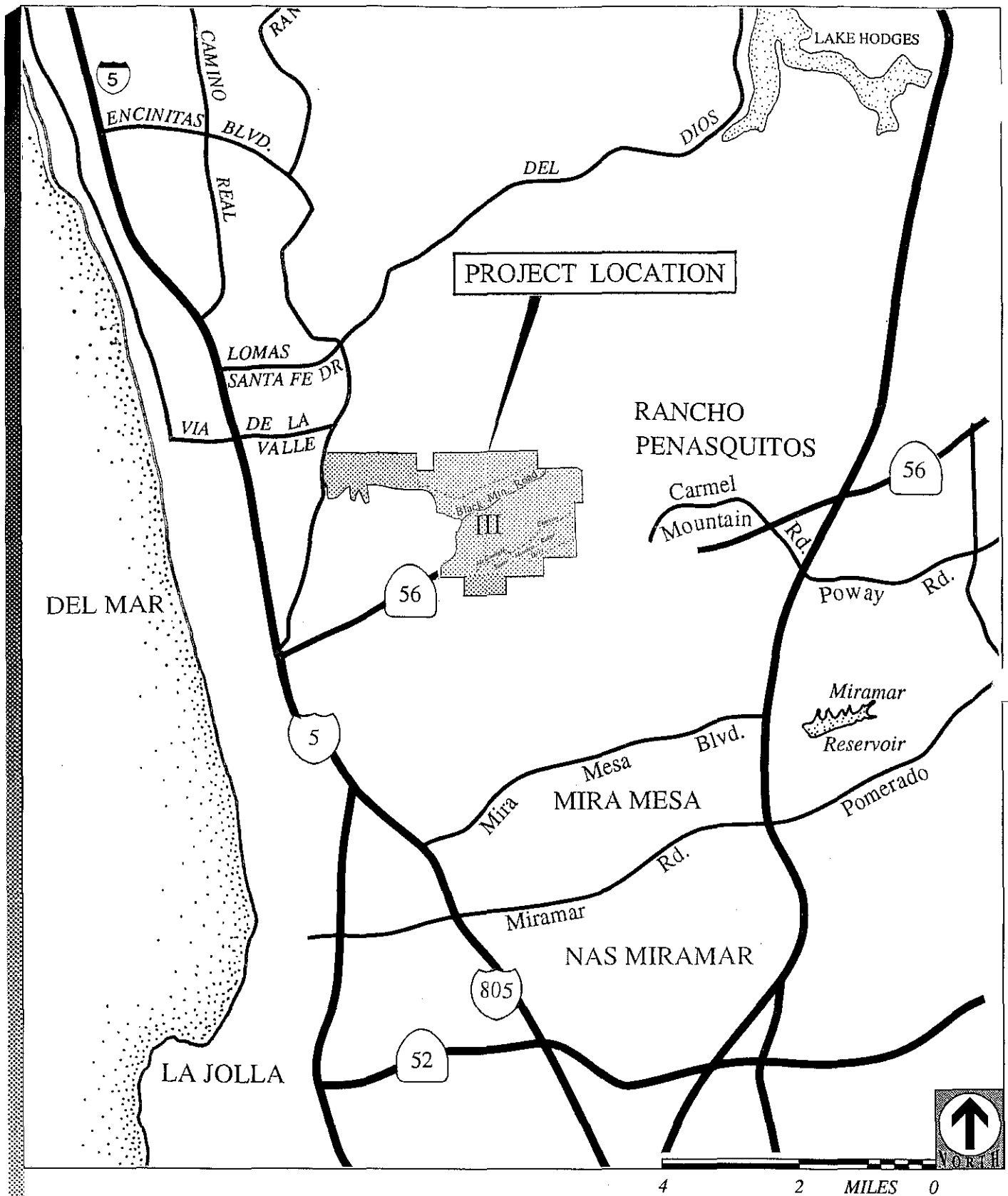
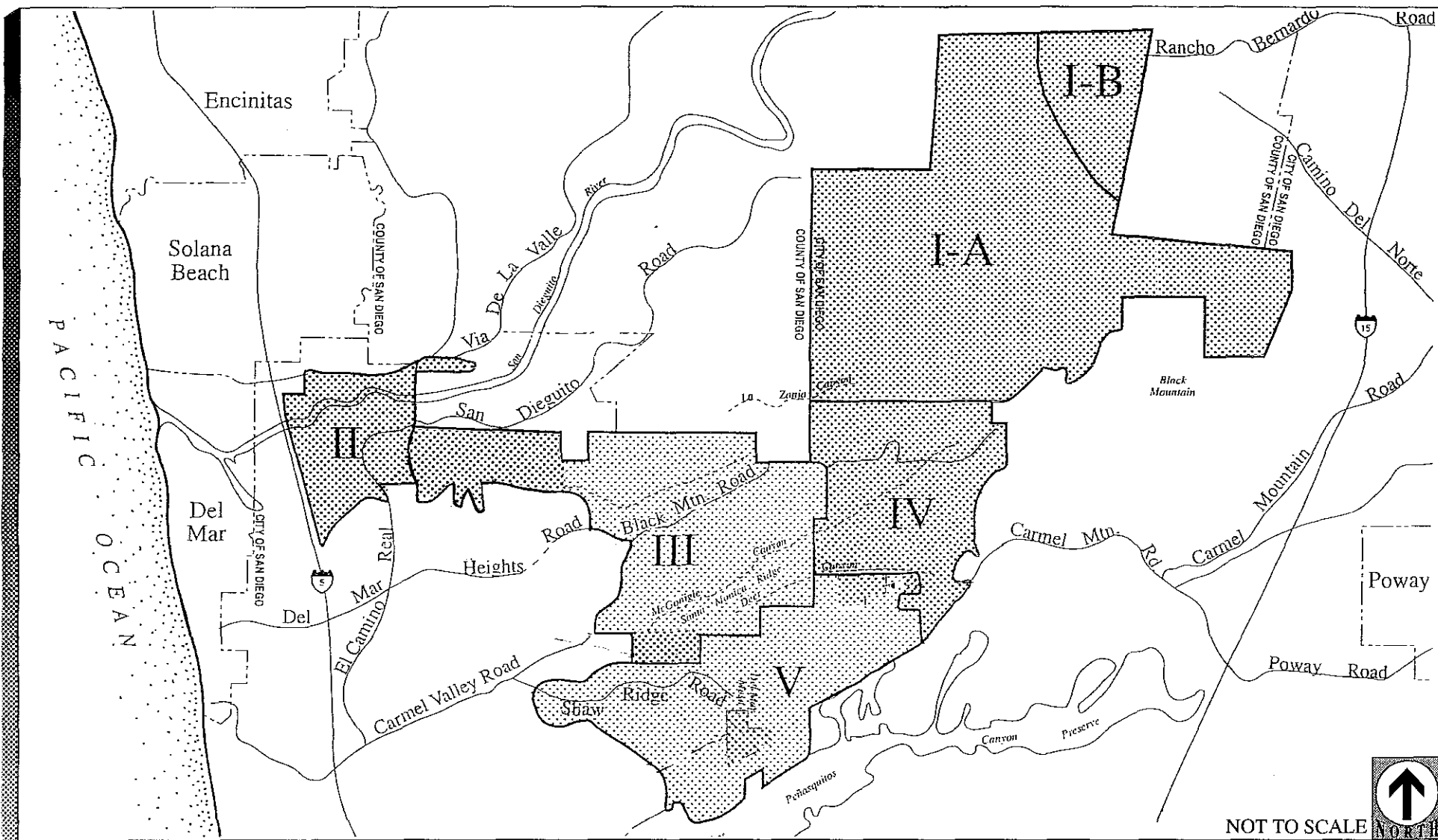


FIGURE 2-1

Regional Location of the Project



Source: Helix Environmental Planning Inc. 1995


 Future Urbanizing Area

FIGURE 2-2

North City Future Urbanizing Area
Planning Subareas

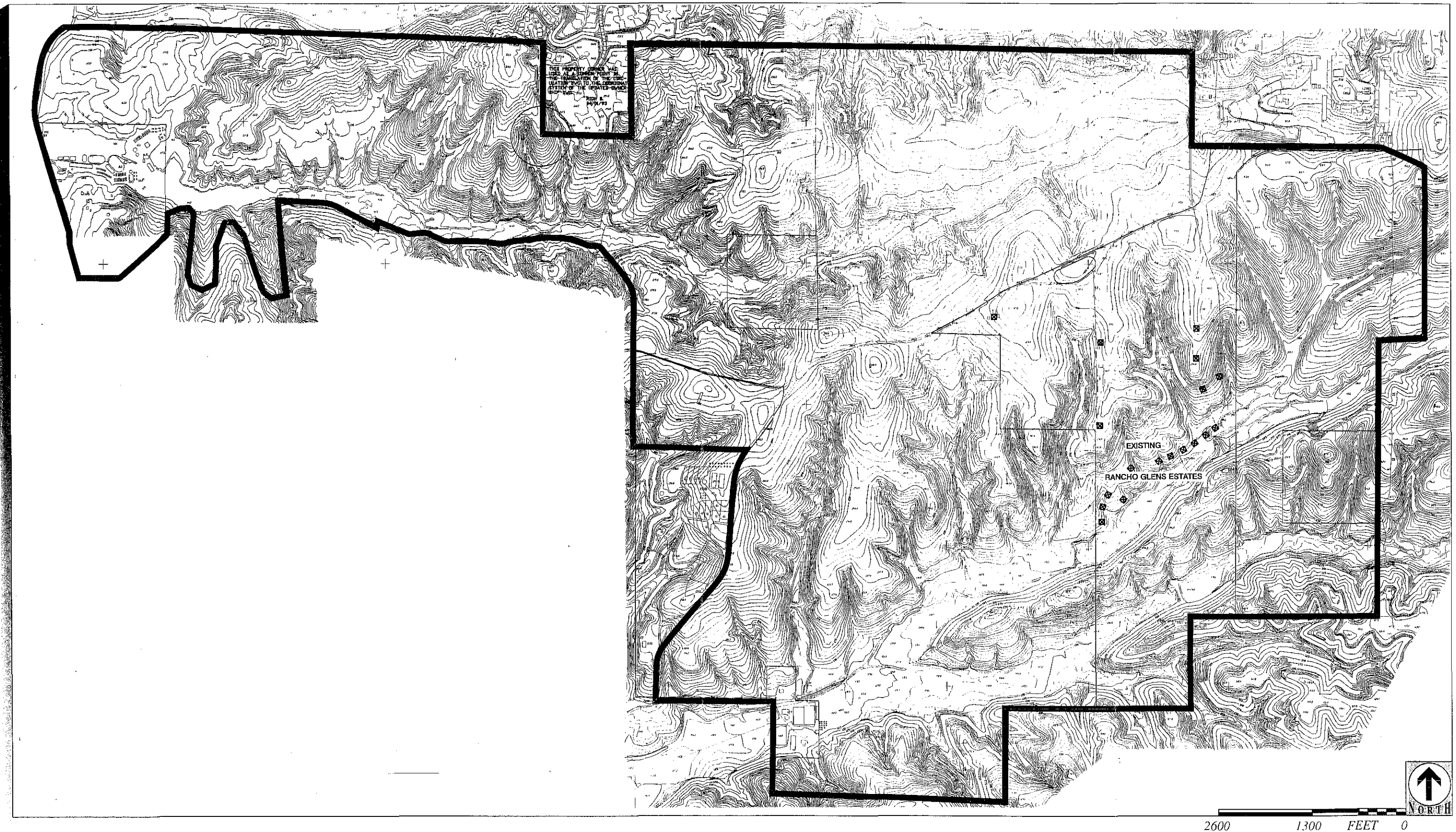


FIGURE 2-3
Existing Site Topography

along Caminito Mendiola. The nursery operations are mainly located along Black Mountain Road and grow flowers, palms, and other plants for landscaping purposes. The prime agricultural product in the project area is pole tomatoes. A north-south San Diego Gas & Electric (SDG&E) power line easement containing a high-power overhead electrical distribution line extends along the eastern boundary and a main water line, and two trunk sewer lines also traverse the site. The remaining on-site acreage includes roads and open space, much of which is in a disturbed condition.

A variety of vegetation types occur within Pacific Highlands Ranch, including Diegan coastal sage scrub, southern maritime chaparral, grasslands, eucalyptus woodlands, coyote bush scrub, southern mixed chaparral, scrub oak chaparral, and riparian communities (southern sycamore riparian woodland, mule fat scrub, southern willow scrub, and southern riparian scrub). In addition, 15 sensitive plant species and 8 sensitive animal species have been observed on the property.

Access to Pacific Highlands Ranch is currently provided by Black Mountain Road, which traverses the site in an east/west direction between Del Mar Heights Road and Rancho Peñasquitos. Carmel Valley Road also provides access to the western portion of the site from the current terminus of State Route (SR-56). Regional access to the subarea is from I-5 via Del Mar Heights Road and SR-56.

C. Surrounding Land Uses

Land uses surrounding Pacific Highlands Ranch consist primarily of open space and residential uses. Figure 2-4 is an aerial photograph showing the adjacent land use patterns. Specifically, the Del Mar Country Club (golf course and estate residential uses), Fairbanks Ranch (estate residential), Senterra development (low density residential), The Lakes project (estate residential in the county of San Diego), and a nursery occur along the northern boundary. Vacant undeveloped lands within Subareas IV and V exist adjacent to Pacific Highlands Ranch on the east and south, respectively. Shaw Ridge Road (dirt) parallels the southern boundary off-site within Subarea V. The surrounding land uses to the west consist of low density residential development within the Carmel Valley community planning area both north and south of Carmel Valley.

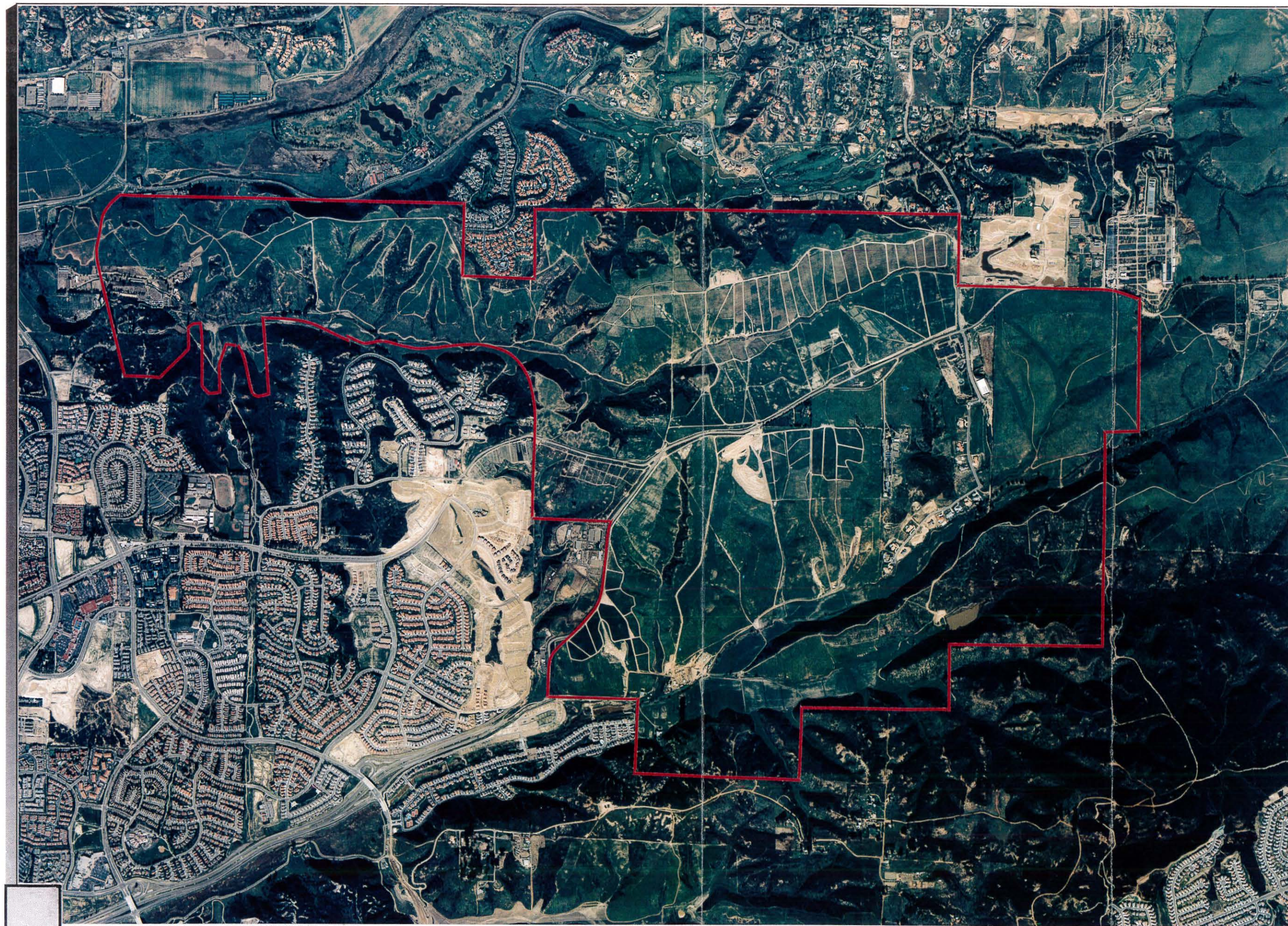


FIGURE 2-4

Aerial
Photograph
of Subarea III
and
Surrounding
Land Uses



D. Existing City Plans, Policies, and Regulations

1) Framework Plan and Zoning

The Framework Plan for the approximately 12,000-acre NCFUA was adopted by the City of San Diego in 1992. It establishes preliminary roadway alignments, open space boundaries, and land use patterns for the NCFUA, serving as a guideline for the creation of more specific land use plans for each of the five subareas. The Framework Plan amended the City's Progress Guide and General Plan (General Plan). Where the Framework Plan is more specific than the General Plan, it supersedes the General Plan. Pacific Highlands Ranch is one of the five NCFUA subareas and is currently zoned A-1-10 (one dwelling unit per 10 acres), with hillside review overlay zones concentrated along its northern, western, and southern boundaries. The A-1-10 zoning is intended as a holding zone until approval of the subarea plans and associated phase shift.

The City Council approved a new zone code in late 1997; however, before it can take effect it must be approved by the State Coastal Commission. Hearings are planned for the spring of 1998. Subarea III would be subject to the updated Zoning Code. Provision is made in the new zone code for a conversion from the existing code to the new code. For example, the City's Resource Protection Ordinance would be replaced by the Environmentally Sensitive Lands Ordinance.

2) Managed Growth Initiative

On November 5, 1985, the electorate of the City of San Diego approved the Managed Growth Initiative (Proposition A), amending the General Plan such that "No property shall be changed from the 'future urbanizing' land use designation and the provisions restricting development in the future urbanizing area shall not be amended except by majority vote of the people" (City of San Diego 1989).

3) City Council Policies

a) Council Policy 600-29

Without approval of the Pacific Highlands Ranch Plan and associated General Plan Amendment (GPA), development in Pacific Highlands Ranch and the rest of the NCFUA is presently regulated by the underlying zone and City Council Policy 600-29, "Maintenance of Future Urbanizing Area as an Urban Reserve." City Council Policy 600-29 was approved in July 1981 and provided four means of development. These are:

- Development as allowed under the existing A-1 zoning regulations, at the density and minimum lot size permitted;
- Development as a planned residential development (PRD) under the Rural Cluster Development regulations with the number of residences allowed by the underlying zone (A-1-10, A-1-5), but clustered to promote more efficient land utilization and conservation; the undeveloped portions could be developed at some future date at higher densities subject to adoption of a community plan, precise plan, or specific plan; rezoning; and a phase shift to Planned Urbanizing;
- Development as a PRD at a maximum density of one unit per four acres, but only if clustered (grouped into more compact areas) in a portion of the property and no future development rights remain on the undeveloped portion of the property; and
- Development under a conditional use permit (CUP).

Council Policy 600-29 was amended in November 1990 to restrict the allowable development with a CUP to uses that are natural resources dependent, nonurban in character, or interim uses. Additional criteria for the preceding list of development alternatives were also provided. Development with a PRD at a density of one unit per four acres is now permitted "in order to promote the permanent preservation of land designated in the General Plan as part of the Environmental Tier." Development with the number of units allowed by the underlying zone was amended to allow development according to the Rural Cluster Development regulations. This option includes clustering to:

- Promote more efficient land utilization and land conservation;
- Allow development in patterns more consistent with those occurring in adjacent areas;
- Avoid fragmentation of land ownership patterns which would mitigate against future development opportunities;
- Allow for reasonable development opportunities during the planning period without foreclosing future development choices; and
- Make annexation of unincorporated lands more attractive where such land will be brought into the Future Urbanizing area.

b) Council Policy 600-30

City Council Policy 600-30, "General Plan Amendments to Shift Land from Future Urbanizing to Planned Urbanizing Area," was amended after the approval of Proposition A. This council policy states that no land shall be shifted from the Future Urbanizing area to the Planned Urbanizing area except by a GPA approved by the City Council and approved by a majority vote of the people. The policy further states that once land is shifted to the Planned Urbanizing area, rezones and other development approvals shall be in accordance with applicable City requirements.

c) Council Policy 600-40

Council Policy 600-40 was created in order to ensure that the preparation and adoption of long-range plans for the city include a thorough analysis of the constraints and opportunities of the planning area, including but not limited to the resources protected by the City's Environmental Sensitive Lands (City of San Diego 1991). In addition to ensuring a thorough analysis of the site at an early stage in the planning process, the purpose of 600-40 is to (1) aid in the review of permits and maps in the planning area, (2) ensure protection of environmental resources by preserving contiguous open space systems and providing mechanisms to acquire or protect these resources, and (3) ensure that adopted land use policies and objectives are considered in the context of the suitability of the plan area for development (City of San Diego 1991).

According to Council Policy 600-40, a development suitability analysis is to be conducted for all long-range plans, such as the Pacific Highlands Ranch Plan, to ensure that environmental resources and other site constraints and opportunities are fully considered in preparation of the plan. This policy goes on to state that "Development, including land uses, roads, and other facilities, shall be distributed so as to minimize encroachment into hillsides, biologically sensitive lands, significant prehistoric and historic resources and other resources addressed in RPO. Mechanisms to protect these resources must be addressed in the long-range plans in sufficient detail to adequately evaluate future applications for permits and maps in the planning area, and to ensure reasonable use of land or appropriate compensation for all property owners." Figure 2-5 shows the existing ownership patterns within Pacific Highlands Ranch. It is the City's objective that substantial habitat acreages be preserved by implementing the long-range plan, which could not be achieved if the property was developed on a parcel-by-parcel basis.

Council Policy 600-40 also requires that the City Manager's recommendation on the draft plan be based upon the site suitability analysis, which enables decision makers to determine the consistency of the plan with RPO and other adopted General Plan and City Council policies and objectives. If future projects or permit applications within the precise plan area are found to be consistent with the precise plan, future RPO permits

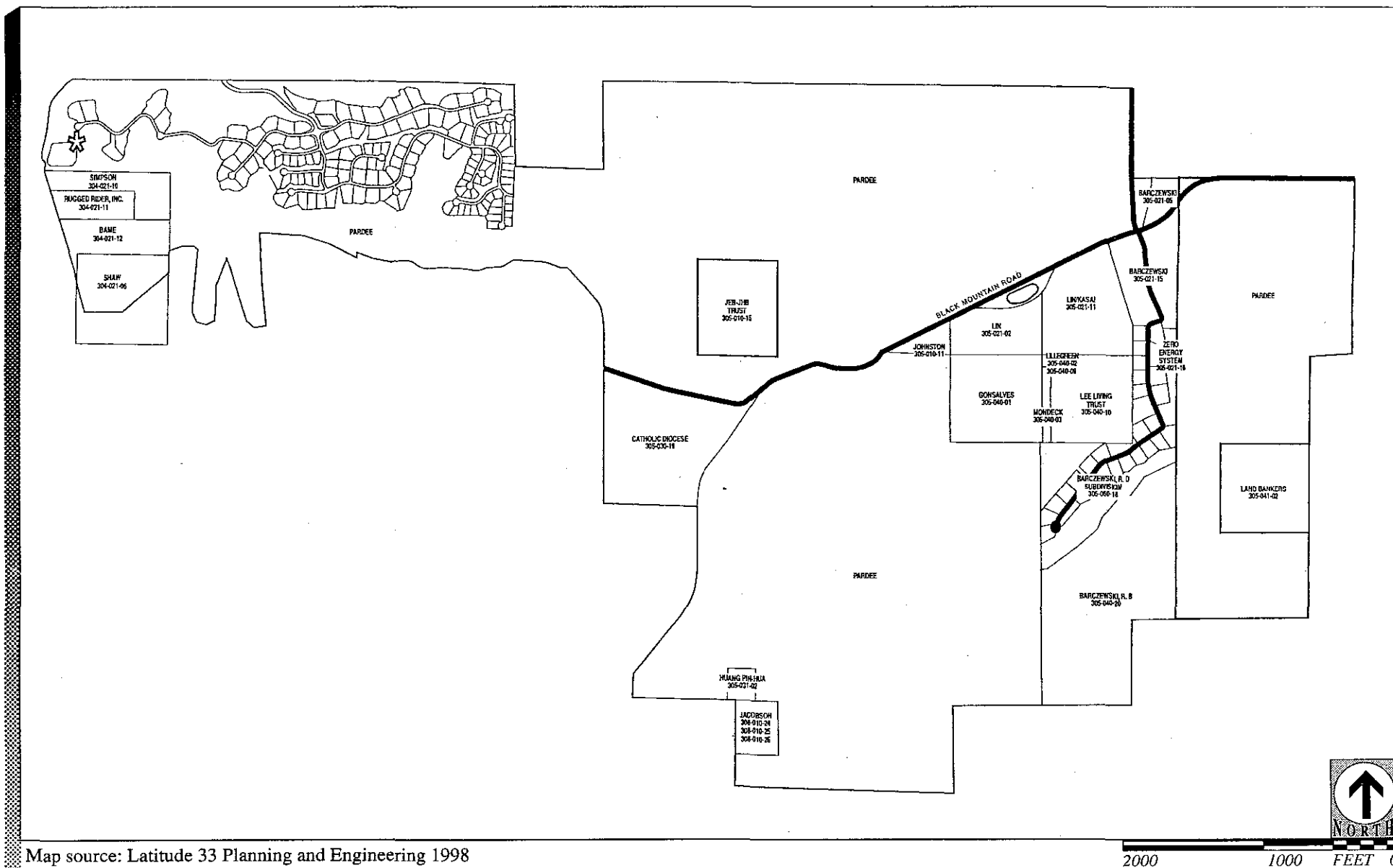


FIGURE 2-5
Ownership Map

may be approved using the "Substantial Conformance" provision in the alternative compliance process contained in RPO. If a long-range plan is found not to be consistent with RPO, then an alternative concept plan shall also be presented to the decision maker which would be consistent.

E. Related Planning and Development Projects

Related specific and community plan projects within and adjacent to the NCFUA include the subarea plans for Subareas I-A, IV, and V; adopted Carmel Valley precise plans to the west and south; and buildout of the Fairbanks Country Club Specific Plan and the County's San Dieguito Community Plan to the north. In addition to buildout of the community and specific plans and proposed development projects in the area, the following regionally significant projects are described below:

State Route 56: The middle segment of this state freeway is currently the subject of a City draft EIR. The middle segment of SR-56 would be extended through Subareas III and IV of the NCFUA, connecting with existing segments of SR-56 located to the east and west of the NCFUA. The City of San Diego, as lead CEQA agency, prepared an initial draft EIR which was released for public review in December 1996. Two alignments (northern and central) are examined in the draft EIR. Based on comments received during the public review period, a revised draft EIR was released in January 1998 which examines two additional northern alignments (i.e., Alignments "D" and "F") for SR-56. These two northern alignments form the basis for the two Pacific Highlands Ranch Plans which are addressed in the body of this EIR. The central alignment is, however, included as a project alternative in Chapter 8 of this document.

Multiple Species Conservation Program: In 1991 the City of San Diego and other land use jurisdictions in southwestern San Diego County began development of the Multiple Species Conservation Program to meet the Metropolitan Wastewater Department's need to mitigate the direct biological impacts associated with mandated improvements to the region's sewage treatment facilities. The MSCP effort was also directed toward mitigating the secondary biological impacts associated with projected growth in the region.

The MSCP is designed to identify lands that would conserve habitat for federal and state endangered, threatened, or sensitive species, including the federally listed threatened California gnatcatcher. The MSCP has been found to be the equivalent of a Natural Community Conservation Plan for the area, consistent with the federal Endangered Species Act Section 4(d) rule for the coastal California gnatcatcher that would define conditions under which "take" of

the species could occur without violation of the Endangered Species Act. That is, the MSCP is a plan and process for the issuance of permits under the federal and state Endangered Species Acts and the state's Natural Community Conservation Planning Act of 1991.

On March 18, 1997, the City of San Diego adopted the MSCP. An objective of the MSCP is to conserve a connected system of biologically viable habitat lands in a manner that maximizes the protection of sensitive species and precludes the need for future listings of species as threatened or endangered. Responsibilities for conservation planning in the MSCP study area are organized by subareas. The input from the jurisdictions and other special district and agency participants is summarized in the Multiple Habitat Planning Area (MHPA) maps (Figures 3-2, 3-3, and 3-4 of the MSCP).

The MHPA is the area within which the permanent MSCP preserve will be assembled and managed for its biological resources. The MHPA is defined in many areas by mapped boundaries, as mentioned above in the referenced figures of the MSCP, and also is defined by quantitative targets for conservation of vegetation communities and goals and criteria for preserve design. Within the NCFUA, the MHPA boundaries are as shown in the Biology section of this MEIR. Resources to be preserved in the MHPA include coastal sage scrub, southern maritime chaparral, various wetland habitats, and many sensitive and/or listed plants and animals. The MHPA in this area is largely comprised of regional linkages leading to biological core areas within existing reserves and parks. The City of San Diego MSCP Subarea Plan with respect to the NCFUA states the following: "Subareas III and IV contain only extended regional corridors, linking to the north, west, and south. These corridors primarily lie in canyons or drainages, and the majority require restoration to enhance their long-term value."

On July 14, 1997, the City of San Diego signed an Implementing Agreement with the U.S. Fish and Wildlife Service and California Department of Fish and Game. The Implementing Agreement is the contract between the City and the wildlife agencies, which outlines the obligations and commitments made for the successful completion of the MSCP. The agreement has been signed by all parties and is effective July 17, 1997.

The Implementing Agreement now allows the City of San Diego to issue Incidental Take Authorizations under the MSCP. The Incidental Take Authorizations replace the Interim Habitat Loss 4(d) permit that was established in August 1994 for permitting take of the California gnatcatcher and its associated habitat, coastal sage scrub.

Carmel Valley Neighborhood 8A: Carmel Valley Neighborhood 8A is one of the 13 "neighborhoods," or development units, described within the Carmel Valley Community Plan. Neighborhood 8A lies approximately one mile southwest of the southern boundary of Pacific Highlands Ranch. Much of this precise planning area consists of very high quality coastal sage scrub vegetation and southern maritime chaparral with numerous sensitive plant and animal species and is part of the Carmel Mountain biological core area.

Precise plans have been proposed for Neighborhood 8A in both 1994 and 1995 and final EIRs have been completed. A noticed public hearing was held on the precise plan on January 24, 1995, but no action has been taken by the City Council. More recently in late 1995, Neighborhood 8A was a component of the 1995 City Manager's Neighborhood 8A Compromise Plan (DEP No. 87-0211, 91-0899, and 94-0576), which included a revised Neighborhood 8A Precise Plan. Another final EIR was prepared for the Neighborhood 8A Compromise Plan, and a noticed public hearing was held on the project on October 31, 1995. No action has been taken on any of the Compromise Plan project components by the City Council, although the Compromise Plan was analyzed in the final MSCP EIR.

Currently, another comprehensive planning effort is being undertaken for Neighborhood 8A and another draft EIR is being prepared which examines several land use scenarios. Each of these development scenarios for Neighborhood 8A are directly related to the land use plans being proposed for Pacific Highlands Ranch through the proposed development agreement between the applicant, Pardee Construction Company, and the City of San Diego. The Development Agreement provides a package of development rights, land dedications to the MSCP, purchase options, the right-of-way for SR-56, and the dedication of lands within Carmel Valley Neighborhood 8A. The high-quality vegetation within Neighborhood 8A includes numerous sensitive plant and animal species. The City of San Diego and several environmental and community groups have identified preservation of Neighborhood 8A as being critical to city-wide preservation efforts. This off-site parcel within Neighborhood 8A is also owned by Pardee Construction Company, who is also the majority landowner within Pacific Highlands Ranch. The effect of this off-site dedication to the MHPA would be to increase preservation of scarce Tier I resources while allowing development on less sensitive non-native grasslands within Pacific Highlands Ranch. The "package" included in the Development Agreement provides certain assurances to Pardee and extraordinary benefits to the City.

Chapter Three

Project Description

A. Project Background

Pacific Highlands Ranch is one of five subareas that comprise the 12,000-acre North City Future Urbanizing Area in the city of San Diego. The NCFUA is nearly surrounded by developed or developing land. A Framework Plan for the entire NCFUA was adopted by the City Council and a final EIR was certified in August 1992.

The adopted Framework Plan requires that individual plans be prepared for NCFUA subareas that were defined as part of the Framework Plan with each to include specific types and locations of development, locations of major public facilities (e.g., schools and parks), infrastructure needs, and financing requirements. Thus, the purpose of the proposed Pacific Highlands Ranch Plan is to establish a land use plan and open space system that generally comply with the requirements of the NCFUA Framework Plan, the Multiple Species Conservation Plan (MSCP), and other relevant City plans and policies.

The Framework Plan requirements for subarea plans include the following:

- Locate specific land uses relative to the land use patterns in the Framework Plan;
- Establish the open space system;
- Determine precise alignments for circulation element roads which are shown in the Framework Plan;
- Designate corridors for nonmotorized transportation including bikeways and equestrian trails;
- Locate public facilities and access;
- Develop an implementation plan; and

- Demonstrate conformance with City policies and ordinances, including the Resource Protection Ordinance, Council Policy 600-42, Street Design Manual, Landscape Technical Manual, and Transportation System Management.

To date, subarea plans have been approved for Subareas IV (Torrey Highlands) and V (Del Mar Mesa), and one is currently being prepared for Subarea I (Black Mountain Ranch). Based on the Managed Growth Initiative of 1985, all proposed subarea plans and associated phase shifts to the "planned urbanizing area" would require a majority vote of the people.

A draft subarea plan for Pacific Highlands Ranch was proposed in 1993 which included 6,500 dwelling units, 400,000 square feet of commercial and office use, and associated public facilities and transportation network. The Rancho Glens Estates residential subdivision in the central portion of the subarea was approved in 1986 consistent with the underlying zoning; lots have been sold and some homes have been built. Because of the uncertainties regarding State Route 56 and the failure of a July 1993 ballot measure which would have resulted in a phase shift of the entire NCFUA, the above Pacific Highlands Ranch planning efforts were put on hold.

Subsequent to this initial planning effort, four individual projects within the original Pacific Highlands Ranch have been approved. These projects include the Del Mar Highlands Estates PRD, Pet Facility CUP, and Bame Parcel subdivision, and Seabreeze Farms. A PRD/vesting tentative map (VTM) was approved for Del Mar Highlands Estates in April 1997 consistent with the underlying zoning. Grading and construction has begun. Because a phase shift was not required for Del Mar Highlands Estates, this 389-acre property remains in Pacific Highlands Ranch. The Pet Facility CUP was approved in 1996 at the southwestern corner of the subarea in Carmel Valley, and the subdivision of the Bame Parcel (four units) consistent with underlying zoning was approved in 1995. The 72-acre Seabreeze Farms project was approved by the City Council in July 1996 and a phase shift to Planned Urbanizing was approved by the voters in November 1996. The Seabreeze Farms project area on the western boundary has been excluded from the current Pacific Highlands Ranch boundaries as it is now part of the Carmel Valley community planning area.

With the removal of Seabreeze Farms from the boundaries of Pacific Highlands Ranch, the project area now consists of approximately 2,652 acres within the overlying NCFUA. The majority of the subarea consists of undeveloped land, with agricultural uses occurring over much of the site. The proposed subarea plan would refine the existing NCFUA Framework Plan by proposing specific locations for roads and siting and land use designations for future commercial, residential, and public facility land uses. The adoption of a subarea plan is a prerequisite for voter consideration of a General Plan phase shift from Future Urbanizing to Planned Urbanizing, and no approvals for specific development under the subarea plan are being considered at this time.

B. Project Goals and Objectives

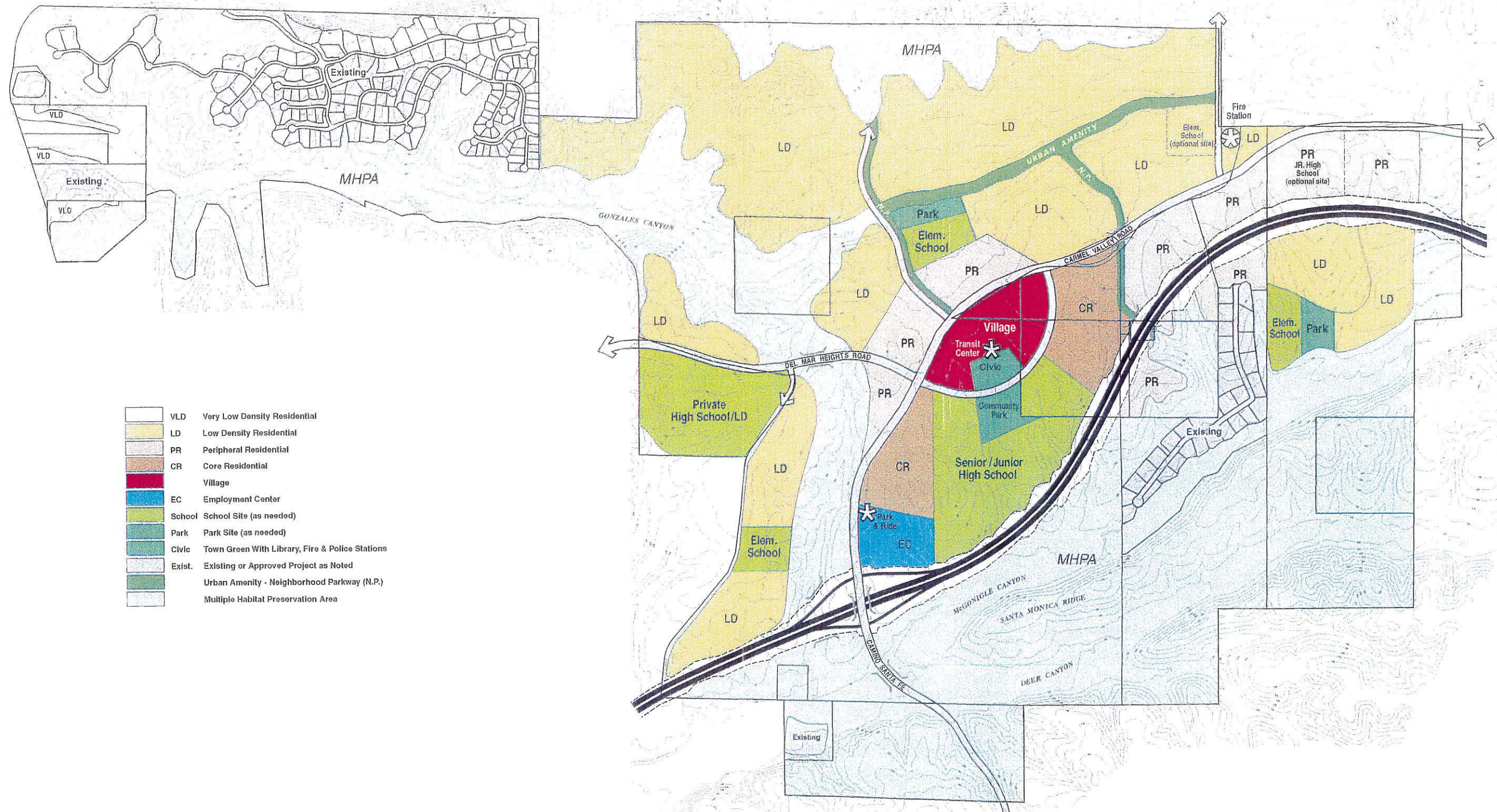
The overall goal of the proposed subarea plan is to refine the land use plan, circulation plan, and open space preserve design for the MSCP in Pacific Highlands Ranch in a manner that is generally consistent with the NCFUA Framework Plan. In addition, the specific objectives include the following:

- Establishment of a land use plan that provides housing and job opportunities for residents while maintaining an acceptable quality of life standard within the subarea;
- 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;
- Control and management of regional growth by establishing a phased approach to NCFUA development, ensuring that necessary public facilities are in place at the time of need, and providing for the siting and financing of such facilities; and
- Assurance that the subarea planning process complies with all City and regional policies, regulations, and programs.

In order to develop a subarea plan that meets the goals of the Framework Plan and the objectives of the property owners within the subarea, along with the circulation and open space goals of the City of San Diego, the subarea plan has been developed in concert with numerous interested groups. These include the Sierra Club, Carmel Valley Community Planning Board, City of San Diego Development Services Business Center, City of San Diego Public Works Business Center, League of Women Voters, and the Endangered Habitats League. Numerous meetings and site visits were held in 1997 and 1998 to develop a draft subarea plan which addressed the concerns of the interested parties.

C. Land Use Summary

This MEIR addresses two separate land use plans (Figures 3-1 and 3-2) which incorporate two proposed northern alignments for the middle segment of SR-56. These two northern alignments are currently being evaluated by the City in a revised draft EIR released on January 21, 1998. The alignments are based on public input received during the public review of the January 1997 draft City EIR which evaluated two other alignments: a Northern and Central one for the middle portion of SR-56. All of the alignments would pass through Pacific Highlands Ranch.



Map Source: Latitude 33 Planing and Engineering 1998

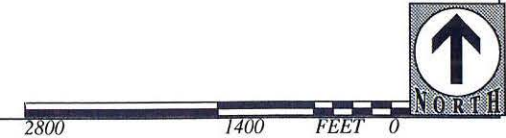
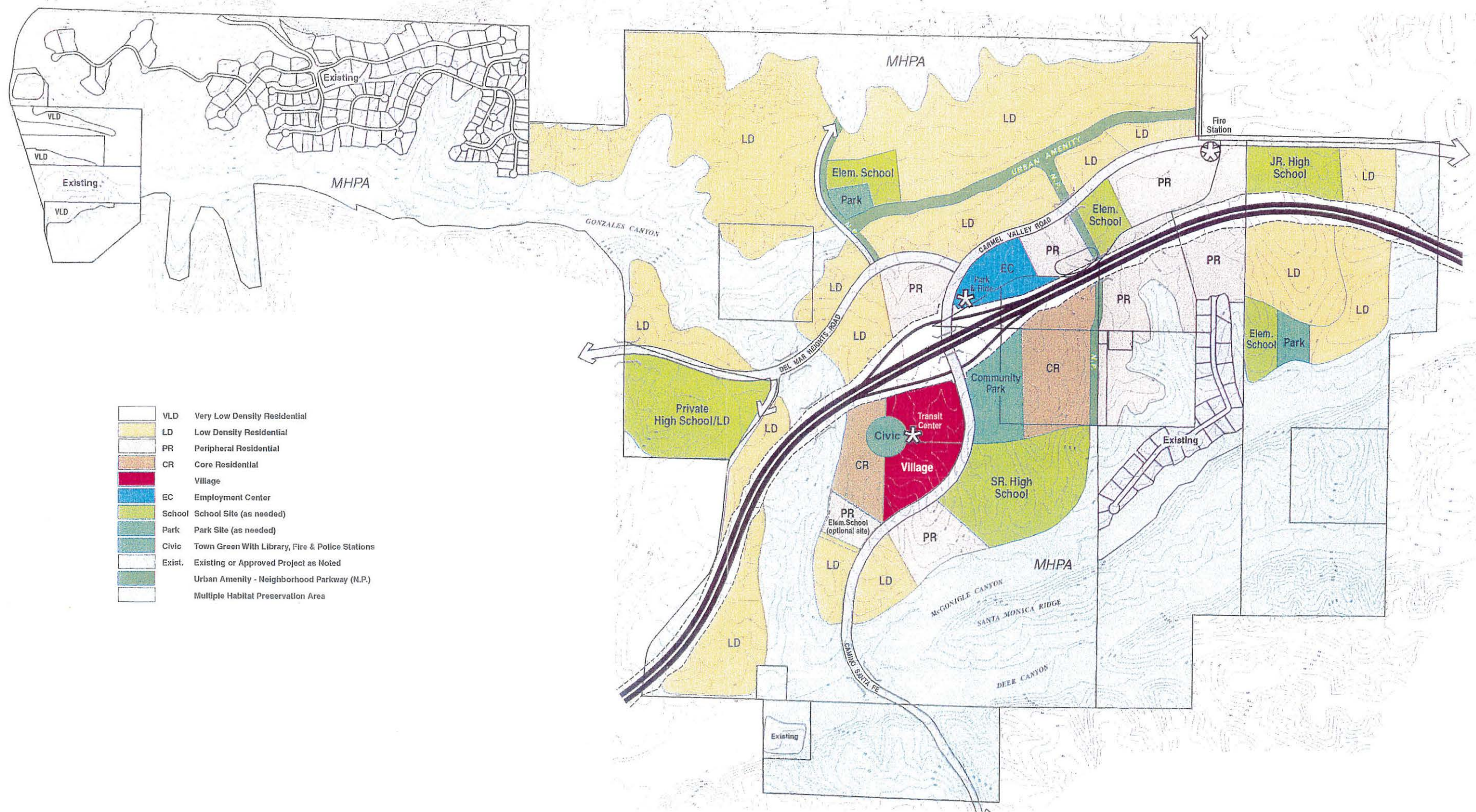


FIGURE 3-1
Subarea III Land Uses - Plan 1



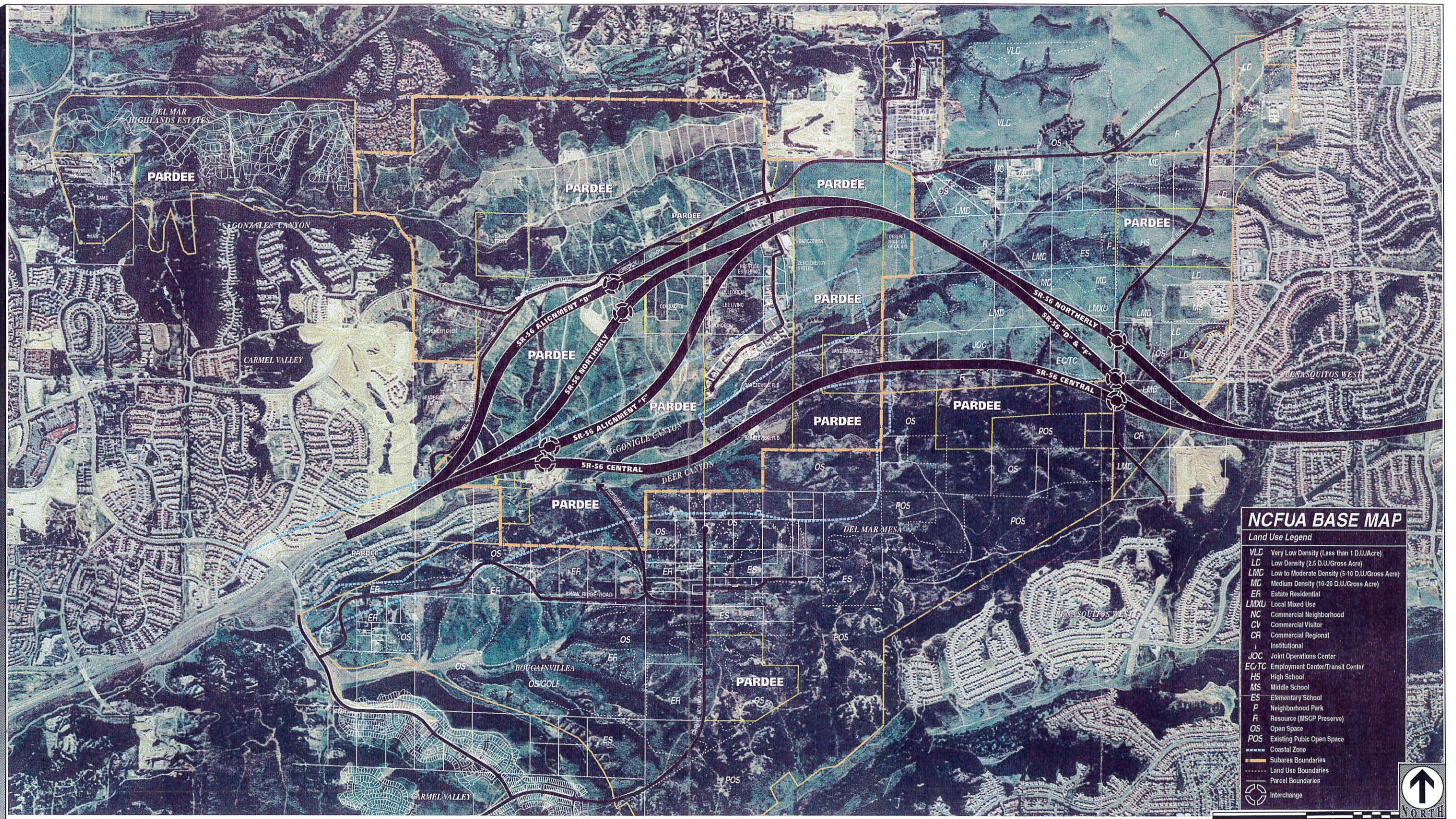
Map Source: Latitude 33 Planing and Engineering 1998

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FIGURE 3-2

Subarea III Land Uses - Plan 2



Source: Latitude 33 Planning and Engineering 1998

FIGURE 3-3
Aerial Photograph of Project Site
Showing SR-56 Alignments
and Ownership Patterns

Figure 3-3 illustrates the two proposed alignments for SR-56 addressed in this EIR and their relationship to Pacific Highlands Ranch as well as ownerships within Pacific Highlands Ranch affected by the alignments. Table 3-1 summarizes the proposed land use designations and acreages for each plan, and Table 3-2 summarizes the proposed master rezoning of the site. Both land use plans illustrate the alignments for major streets and SR-56; pedestrian, bicycle, and equestrian trails; a Town Center and Village area; an employment center; sites for schools, parks, and other public facilities; transit facilities; delineation of MSCP open space, wildlife corridors, permanent open space areas, and urban amenity areas; and design principles and standards for future development. A Resource Protection Ordinance analysis and Council Policy 600-40 development suitability analysis has also been prepared for both subarea plans. Both plans are summarized below.

1) Subarea Plan 1 (SR-56 Alignment “F”)

As proposed, Subarea Plan 1 includes up to 4,974 new residential dwelling units; a Town Center and Village area consisting of commercial uses, retail uses, a community park, a community green, high-density residential, and a civic area; an employment center; three elementary schools; two neighborhood parks; one junior high and an optional junior high; two high schools (one private and one public); a public library; a fire station; and the associated public facilities and transportation network. The limits of development and grading would cover approximately 50 percent of the 2,652-acre subarea. The remaining 50 percent of the site would comprise an open space preserve, including a trail system, which is functionally equivalent with the adopted City of San Diego Multiple Species Conservation Plan. There would be a potential increase in the maximum number of dwelling units (up to 5,456) should the private high school site, junior high school, and one of the elementary school site are redesignated for residential uses.

The major circulation element roads consist of Carmel Valley Road, Del Mar Heights Road, Camino Santa Fe, and SR-56 freeway corridor. Subarea Plan 1 includes SR-56 “Alignment F” as described in the SR-56 revised draft EIR, which is currently being prepared by the City of San Diego.

2) Subarea Plan 2 (SR-56 Alignment “D”)

Subarea Plan 2 incorporates a more northerly alignment for SR-56. This alignment, referred to as Alignment “D” in the SR-56 revised draft EIR, traverses Pacific Highlands Ranch in a diagonal manner and alters the backbone circulation system and land use plan proposed under Plan 1. Figure 3-2 shows the proposed land use plan under this scenario. Subarea Plan 2 includes up to 4,974 new residential dwelling units; a Town Center and Village area with the same uses described above on the south side of SR-56; three elementary schools, two neighborhood parks; a community park; a community green; one

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TABLE 3-1
SUBAREA III LAND USE DESIGNATIONS

Land Use	Code	Plan 1			Plan 2	
		du/ac	Dwelling Units	Acres	Dwelling Units	Acres
Proposed Projects						
Estate Residential	ER	0-0.25	0	0	0	0
Very Low Density Residential	VLD	0.25-1	12	12	12	12
Moderately Low Density Residential	MLD	1.1-2	0	0	0	0
Low Density Residential	LD	2.1-5	2,368	544	2,352	535
Peripheral Residential	PR	5.1-9	1,098	143	1,232	147
Core Residential	CR	9.1-14	996	60	878	55
Village	V	34	500	33	500	33
Employment Center	EC	None	0	20	0	17
School Site (as needed)	SCHOOL	None	0	152	0	155
Park Site (as needed)	PARK	None	0	24	0	31
Town Green	CIVIC	None	0	8	0	8
Multiple Habitat Planning Area	MHPA	None	0	1,268	0	1,266
SR-56 and Major Roads		None	0	213	0	218
Subtotal			4,974	2,477	4,974	2,477
Existing or Approved Projects						
Rancho Glen Estates	ER	0-.25	29	43	29	43
Bame Property	ER	0-.25	4	10	4	10
Del Mar Highlands Estates	ER/PR	0-.25/5-9	172	116	172	116
Existing CUP	ER	0-.25	3	6	3	6
Subtotal			208	175	208	175
TOTAL			5,182	2,652	5,182	2,652

**TABLE 3-2
PROPOSED ZONING CATEGORIES**

Existing Zoning Designations	New Zoning Designations
R-1-40	RS-1-8
R-1-10	RS-1-11
R-1-6	RS-1-13
R-1-5	RS-1-14
R-1-5/SLO	RX-1-1
R-3000	RT-1-2
R-2500	RM-1-2
R-2000	RM-1-3
CA	CC-1-3
MIP	IP-2-1

junior high and an optional junior high, one public and one private high school; an employment center; a public library; a fire station; and the associated public facilities and transportation network. As with Subarea Plan 1, the limits of development and grading would cover approximately 50 percent of the 2,652-acre subarea, and the remaining 50 percent of the site would comprise an open space preserve which is functionally equivalent with the adopted City of San Diego Multiple Species Conservation Plan. The open space preserve would include a trail system. As described for Plan 1, there would be a potential increase in the maximum number of dwelling units (up to 5,414) should the private high school site, junior high school, and one of the elementary school site are redesignated for residential uses.

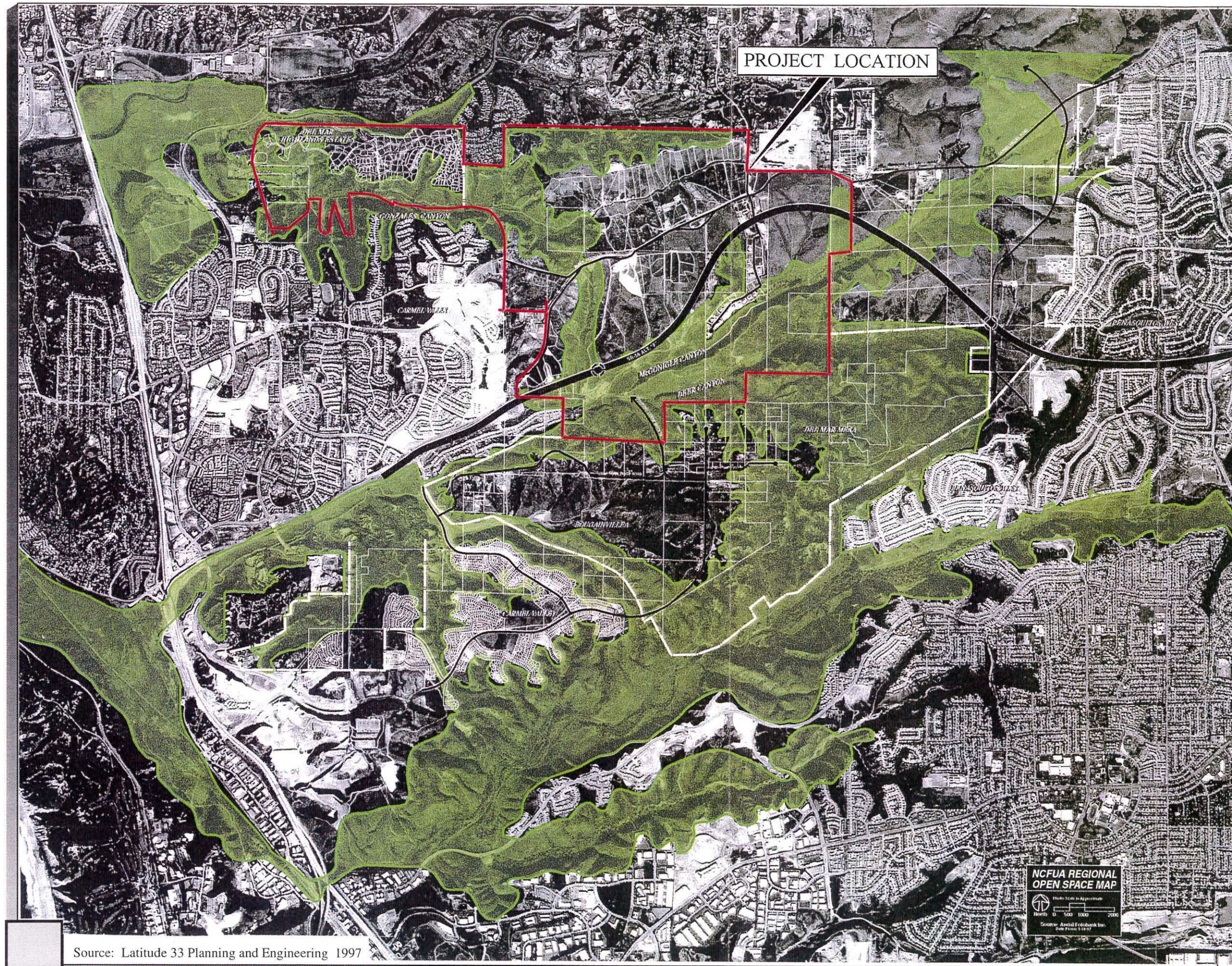
The major circulation element roads also consist of Carmel Valley Road, Del Mar Heights Road, Camino Santa Fe, and SR-56 freeway corridor. However, the transition from Del Mar Heights Road to Carmel Valley Road would represent a more linear west to east route which generally parallels the SR-56 alignment through the site. The intersection of Del Mar Heights Road and Carmel Valley Road would be east and north of the Subarea Plan 1 location and Camino Santa Fe would become a much longer and more circuitous route south of SR-56. Access to the Town Center would be via Camino Santa Fe south of the freeway rather than from Del Mar Heights Road on the north side of SR-56, and the Camino Santa Fe/SR-56 interchange would be approximately 4,000 feet northeast of the location shown in Plan 1.

Each of the project components are described in detail below for each plan.

D. MSCP Open Space

An important component of the proposed land use plan for Pacific Highlands Ranch is the natural open space system and its relationship to the regional biological open space preserve design. As part of the approved City of San Diego MSCP, a Multiple Habitat Planning Area subarea plan has been adopted for the region, including the project area. Figure 3-4 shows the project site and its relationship to this larger regional open space system. The natural open space system for Pacific Highlands Ranch is proposed to establish a system of wildlife corridors and habitat areas consistent with the MSCP. The open space preserve shown for both of the subarea plans discussed below are generally consistent with the MHPA.

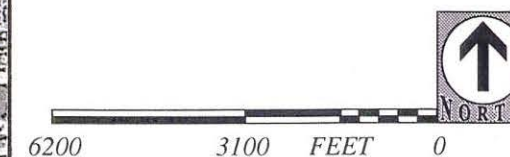
This open space design would also be consistent with the open space system described as the "Environmental Tier" in the City's adopted 1992 Framework Plan. The "Environmental Tier" was established in the Framework Plan to preserve and protect sensitive biological resources, floodways, and important topographic features (ridges, canyons, and hillsides). The open space configuration shown under the Environmental Tier, which included the placement of SR-56 along Santa Monica Ridge/McGonigle Canyon, has



 MSCP Open Space

FIGURE 3-4

Regional
MSCP Open Space



been superseded with the City's adoption of the MSCP and establishment of MHPA preserve boundaries for Pacific Highlands Ranch. The adopted MSCP includes Santa Monica Ridge/McGonigle Canyon as part of a large habitat block extending to Los Penasquitos Preserve, while SR-56 is shown as extending through the preserve. The natural open space described below under both subarea plans is functionally equivalent with the adopted MSCP and would exceed the acreage of open space shown in the Framework Plan's Environmental Tier and would locate much of the SR-56 alignment in the development areas north of the MHPA. The design and configuration of the MSCP preserve open space precludes the need for designing an open space system which uses the Framework Plan Environmental Tier's conceptual planning "habitat protection zones," "biological buffer zones," and "transition zones." This terminology is superseded by formal adoption of the MSCP.

Even though SR-56 is being realigned to largely eliminate impacts to the MHPA, it is important to note that the placement of SR-56 through Pacific Highlands Ranch is addressed and allowed in the adopted MSCP and that impacts to sensitive species and vegetation types are allowed as long as appropriate mitigation is provided. SR-56 is a project that is covered under the MSCP. Mitigation for the impacts associated with SR-56 is addressed in the revised EIR for SR-56.

In addition to the implementation of the MHPA in Pacific Highlands Ranch, the MHPA boundary adjustment includes properties within the Carmel Valley Precise Planning Area (Neighborhoods 8A and 10) and the NCFUA Subarea V (Deer Canyon and Lorenz Parcel). These lands and their relationship to Pacific Highlands Ranch are shown in Figure 3-5. Lands would be added to the MHPA within Neighborhood 8A and acreage would be removed within Neighborhood 10. Approximately 8.1 acres of Tier II and Tier III habitats would be removed from the MHPA within Neighborhood 10 (Figure 3-6). The acreage within Neighborhood 8A (Parcels A and B) contains largely Tier I habitats. The addition of these lands to the MHPA would greatly increase the size of the habitat block planned for Carmel Valley geographic area, improving the overall preserve design and configuration, and providing greater assurances that scarce vegetation types (i.e., southern maritime chaparral) would be maintained over the long term. The addition of a relatively large block of mostly Tier I habitat within Carmel Valley Neighborhood 8A would result in a MHPA that would be functionally equivalent ^{superior} to that shown in the MSCP Subarea Plan.

1) Subarea Plan 1

Subarea Plan 1 would include a total of ~~1,317~~ 1,305 acres of open space. This total would include approximately 1,2680 acres of MHPA undisturbed open space, which is functionally equivalent with the adopted MSCP preserve design as described in the City of San Diego MSCP Subarea Plan. The remaining open space acreage consists of active

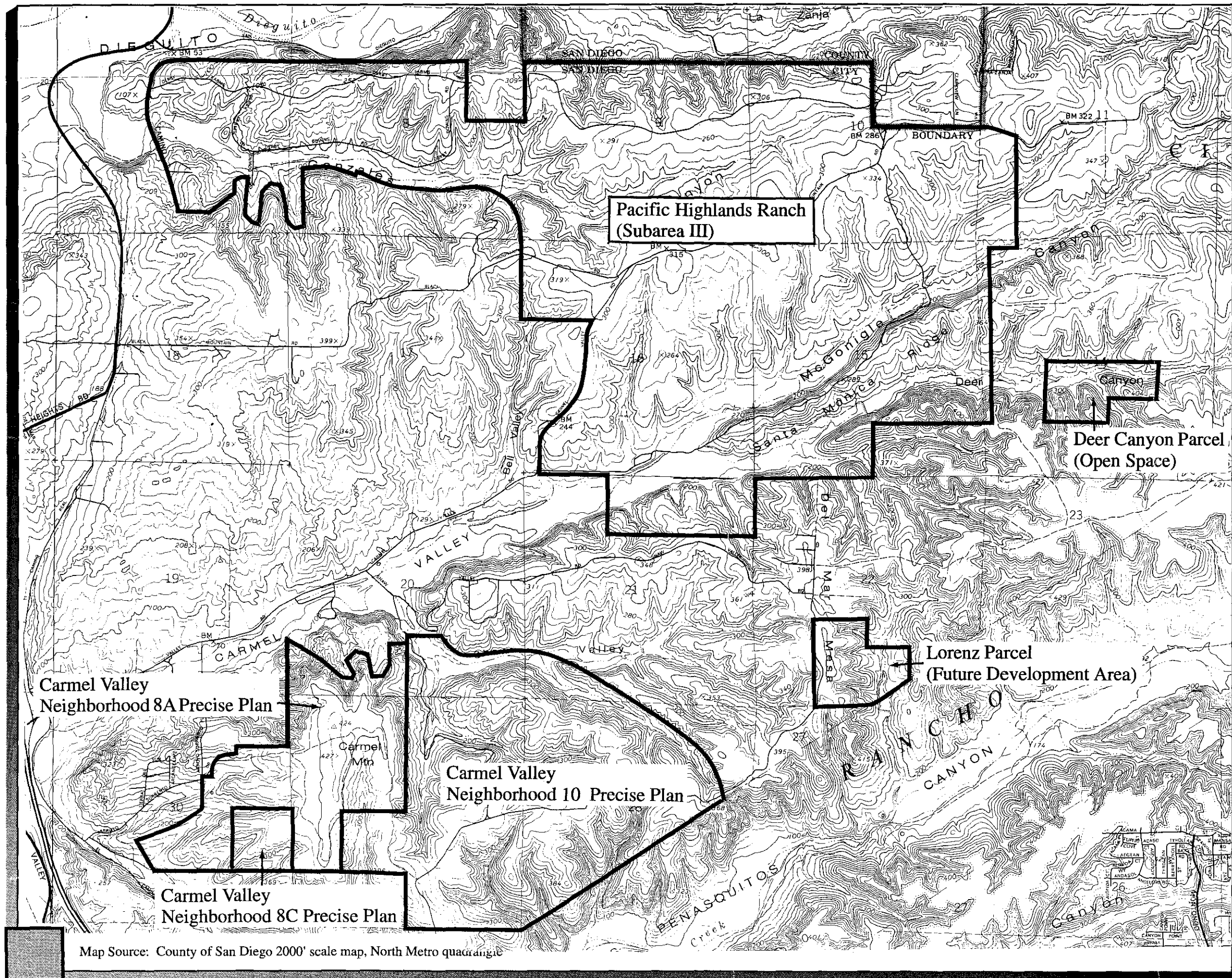
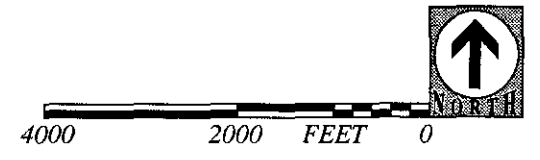
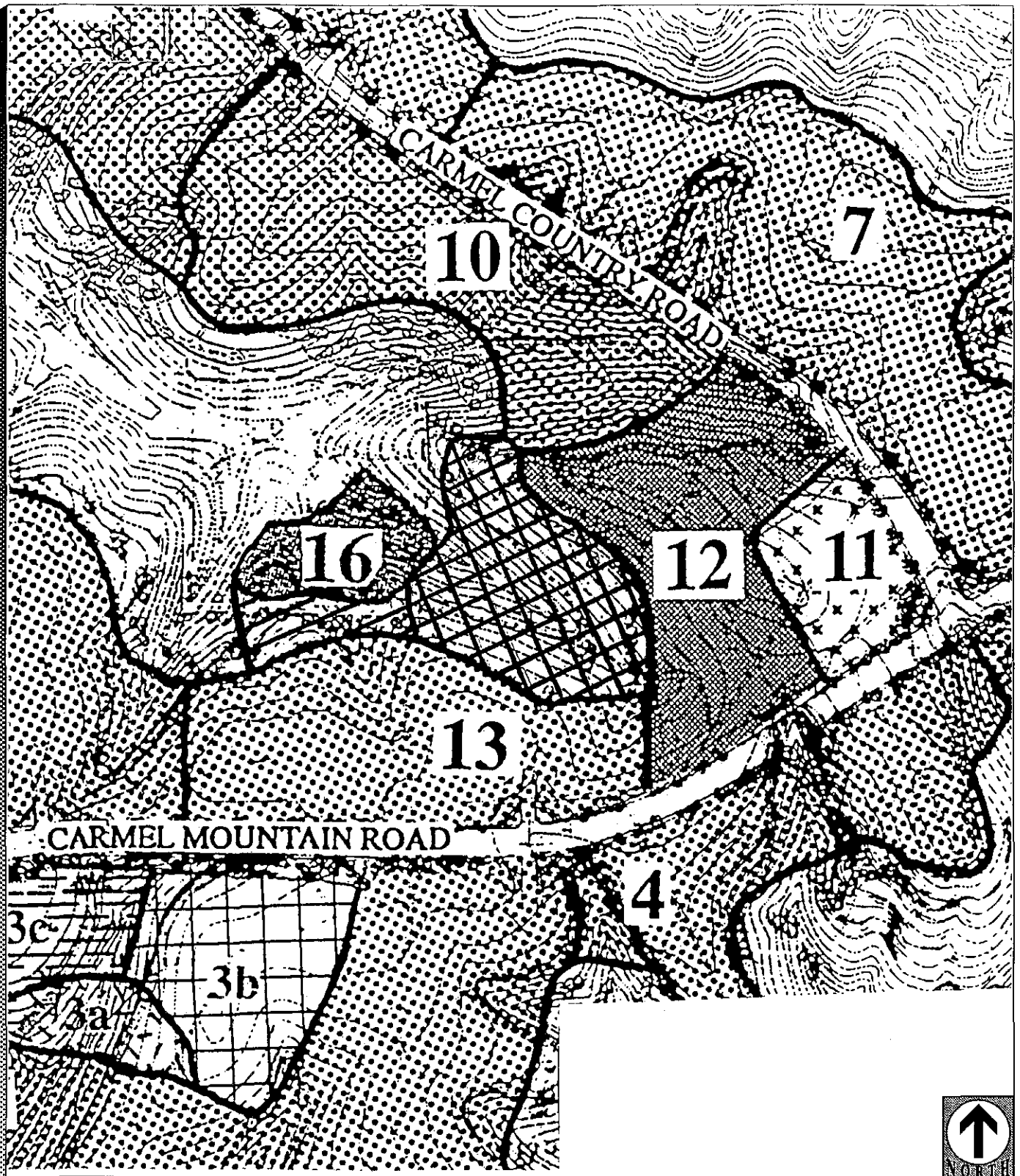


FIGURE 3-5

Proposed Project Components








Source: Project Design Consultants 1998

FIGURE 3-6

**Carmel Valley Neighborhood 10 -
Proposed MHPA Expansion Area
and Land Use Changes**

-  Expanded MHPA area to include 22-24 additional single family units 8.1 ac.
-  Expanded precise plan area 10.1 ac.
-  Unit 12 increased multi-family units

uses (e.g., parks and schools) and the urban amenity features. Figure 3-7 illustrates the boundaries of the adopted MHPA subarea preserve design and the locations where the adopted preserve design has been expanded to more precisely relate to the existing landforms.

As shown on Figure 3-7, the proposed development area for Subarea Plan 1 would be expanded into the defined MHPA open space boundary by approximately 161.4~~149.9~~ acres. Any encroachment into the MHPA associated with the SR-56 alignment is addressed in a separate EIR for SR-56. The encroachment area from the land uses shown for Plan 1 is spread across the subarea and described below:

- Both sides of the east-west urban amenity;
- Gentle slopes above McGonigle Canyon at the eastern boundary;
- North-facing slopes above La Zanja Canyon;
- East of the approved Del Mar Highland Estates subdivision and south of the existing off-site Senterra development;
- Along the edges of the north-south wildlife corridor between Gonzales and McGonigle Canyons.

The proposed expansion into the MHPA has been reviewed by all interested conservation and community planning groups. Numerous meetings and site visits were held with these groups (e.g., Sierra Club, Carmel Valley Community Planning Board, U.S. Fish and Wildlife Service, Department of Fish and Game, and the Endangered Habitats League) in 1997 and 1998 to develop a plan which accommodated regional biological conservation goals, while preserving the function of the MHPA.

The natural open space system proposed for Pacific Highlands Ranch would establish a system of wildlife corridors and habitat areas. The on-site open space system would preserve the habitats and major wildlife corridors south of SR-56 (i.e., Deer and McGonigle Canyons and Santa Monica Ridge) and provide a desired northerly linkage/wildlife corridor via a north-south tributary canyon to Gonzales Canyon. This north-south corridor is part of the regional wildlife preserve system and grading (to be revegetated) would be required to create this linkage with undercrossings beneath Del Mar Heights Road. Gonzales Canyon proceeds westerly through the Del Mar Highlands Estates PRD property and drains into the San Dieguito River valley. Undercrossings are proposed beneath SR-56 and Del Mar Heights Road to facilitate wildlife movement. The steep north-facing slopes above La Zanja Canyon and the San Dieguito River valley along the northern boundary of the subarea would also be a component of the natural open space system.

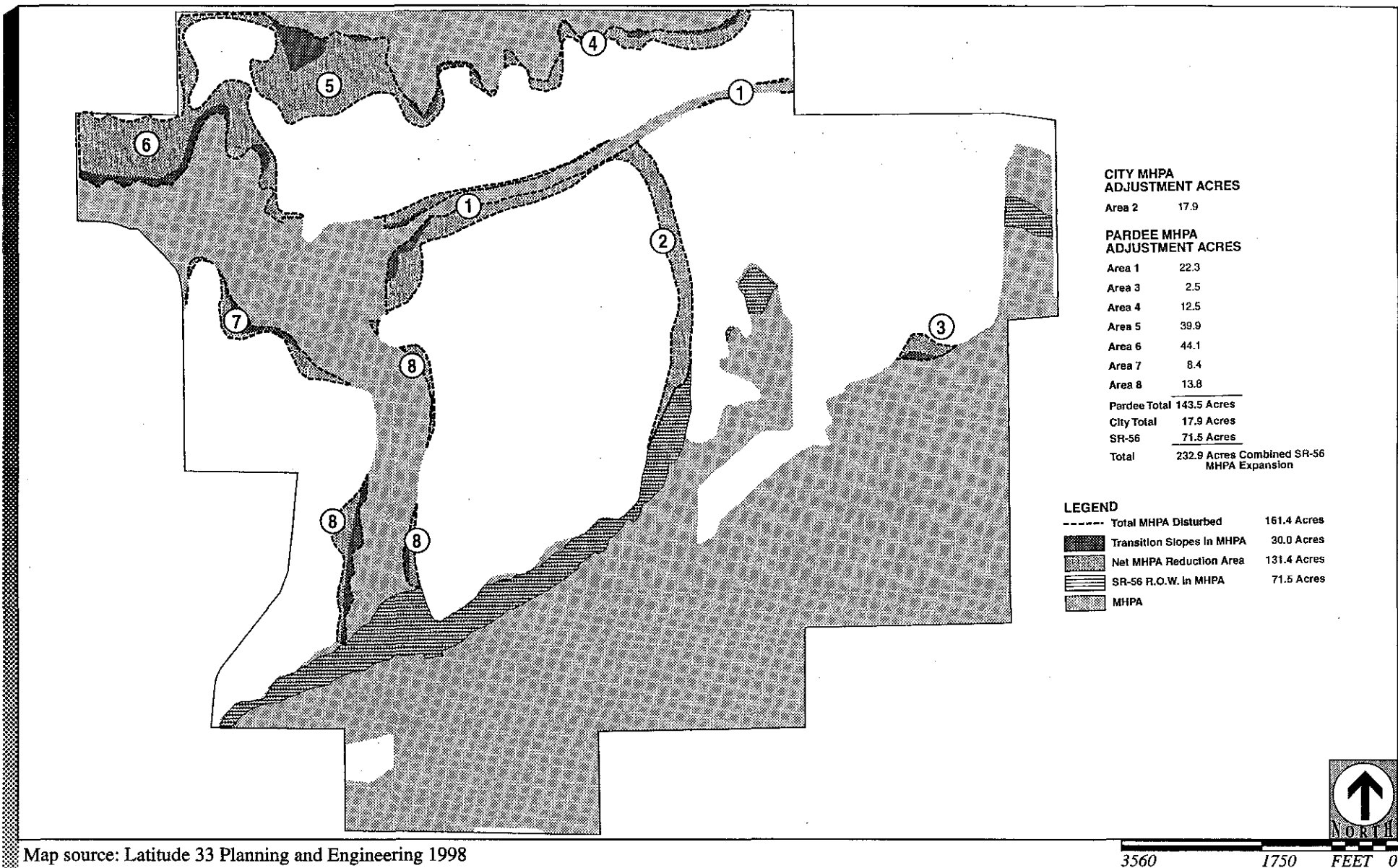


Figure 3-7

**MSCP Preserve Encroachment Areas
Plan 1**

a) Mitigation Land Banks

In order to effectuate the boundary adjustments to the MHPA, a mitigation bank would be established over approximately 100 acres of land within the Pardee ownership in Pacific Highlands Ranch. The bank will consist of disturbed land that will be revegetated in accordance with the master revegetation plan. Restored habitats will consist of appropriate wetland and upland habitats. The City will direct project applicants needing mitigation in the North City area to purchase credits in this bank, and will accept land from this bank into the MHPA upon purchase of credits by a third party. The bank will be processed and approved expeditiously by the City in a manner that will enable establishment costs to be kept to a minimum.

For areas to be restored, a conceptual revegetation summary which outlines the general criteria and maintenance requirements to be included in a more detailed master revegetation plan for Pacific Highlands Ranch is an appendix to this EIR. Restored lands included in the mitigation bank would be maintained as required in the Master Revegetation Plan until credits are sold and the land conveyed to the City for MHPA purposes. Upon conveyance, the City would assume responsibility for management and maintenance.

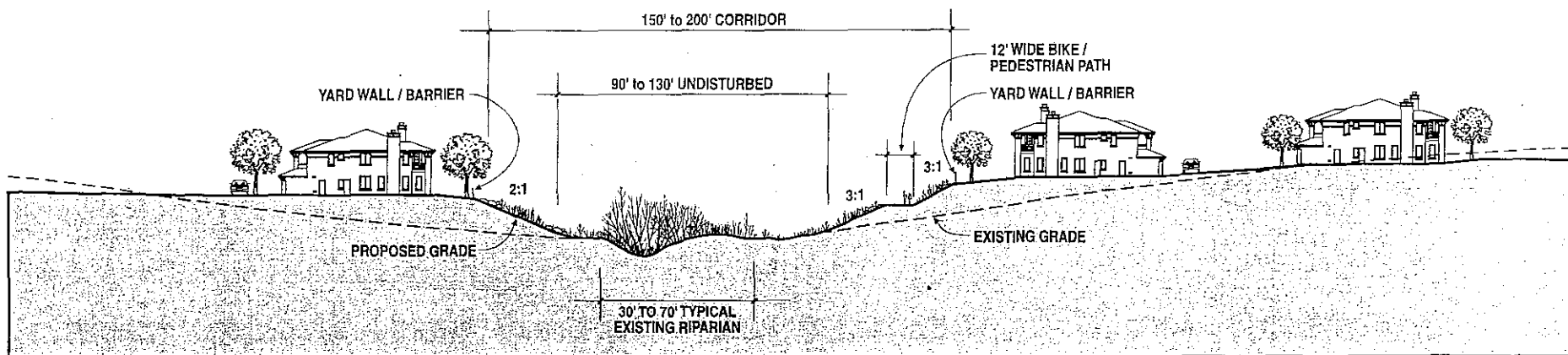
A mitigation bank covering approximately 24 acres within Parcel A of Carmel Valley Neighborhood 8A would also be established as a component of the MHPA boundary adjustment process.

b) Urban Amenity Open Space

The open space system under Subarea Plan 1 would also include approximately 20 acres of "urban amenity" open space that would be located primarily in the upper reaches of Gonzales Canyon. This east-west open space amenity area would be intended to provide visual relief, linear park with recreation benefits, and pedestrian links. The urban amenity would complement the biologically oriented expanses of the open space system by encouraging human use outside the areas where the most valuable natural resources are restored and preserved. This area would not be intended to function as part of the natural habitat system. The urban amenity does, however, protect and preserve the wetland habitat in the upper reaches of Gonzales Canyon. As shown in Figure 3-8, the proposed urban amenity corridors would provide open space links between neighborhoods, public facilities, and activity centers.

c) Neighborhood Parkway Areas

Subarea Plan 1 includes two neighborhood parkways as integral components of the community-wide system for pedestrian movement. The neighborhood parkway's would provide visual relief, recreation benefits, and pedestrian links. They would include either two lanes for automobile traffic, parking on one side, bicycle lanes abutting the traffic



Source: Latitude 3 Planning and Engineering 1998

FIGURE 3- 8
Urban Amenity Cross Section

lanes, a landscaped median, sidewalks, and 25 feet of landscaping (one side only) for benches and trails. The primary neighborhood parkway is a north-south corridor that would connect McGonigle Canyon and the MHPA open space south of SR-56 to the urban amenity and Gonzales Canyon in the north. The neighborhood parkway would be approximately 100 feet wide (see Figure 3-1). The secondary neighborhood parkway would also be approximately 100 feet wide and would connect the Village to the northern neighborhoods, the east-west urban amenity, and the MHPA open space in La Zanja Canyon. Also, this neighborhood parkway would be adjacent to the neighborhood park and elementary school north of the Town Center, and would provide future residents an alternative access route to these facilities.

The neighborhood parkways will include benches and trails and paths that connect the MHPA and the development area on the south side of SR-56 with the remainder of the subarea. SR-56 will bridge the neighborhood parkways and all other vehicle crossings will be kept to a minimum.

The primary neighborhood parkway will replace the north-south urban amenity proposed in the Framework Plan; however, it will be shifted about 800 feet east of the alignment shown in the Framework Plan. It will provide a connection between Gonzales and McGonigle Canyons.

d) Open Space Trails Systems

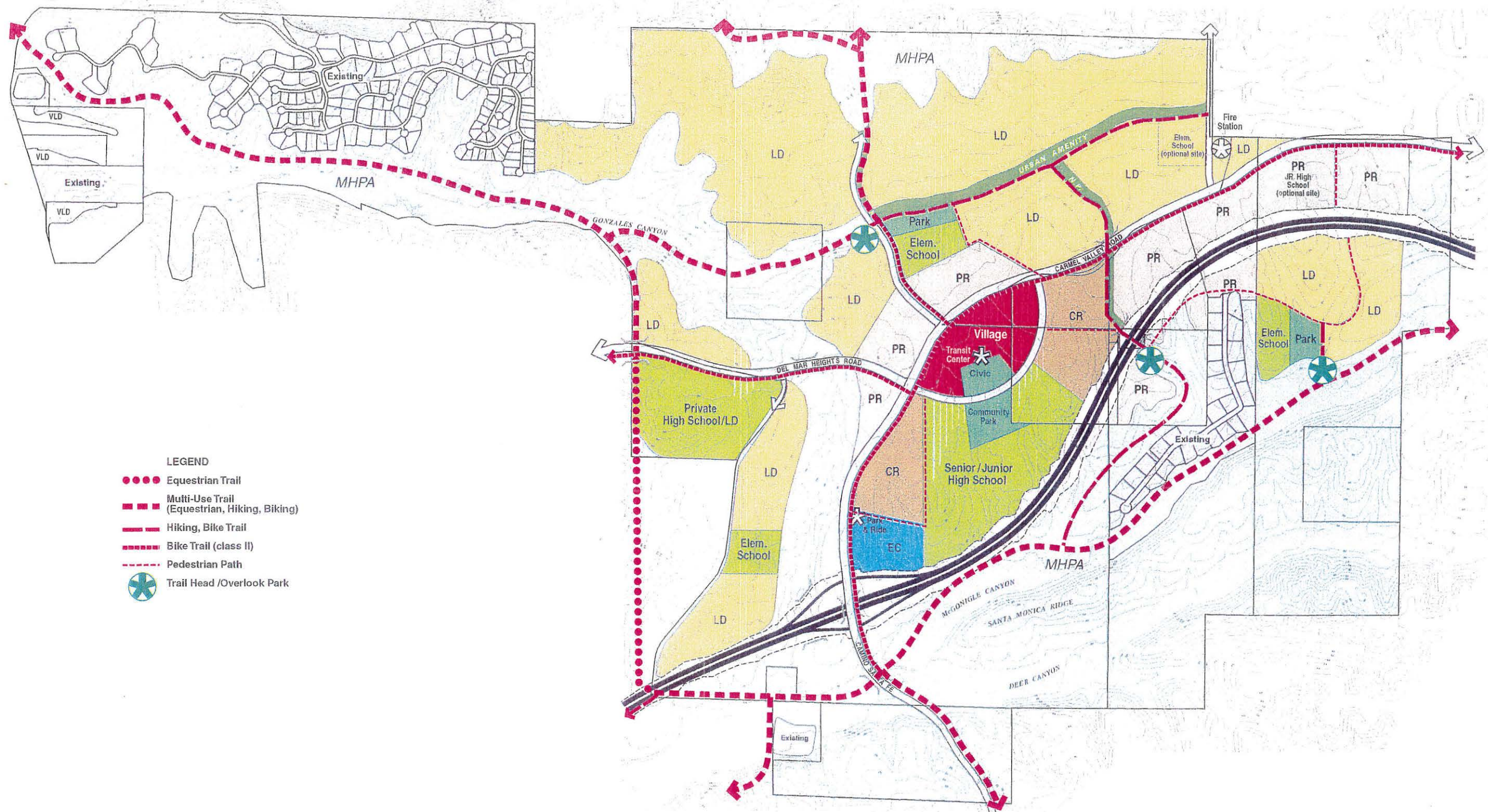
Pacific Highlands Ranch would also include a plan for an extensive system of trails within the overall open space system. The trail system would include hiking, biking, and equestrian trails that connect with existing paths within the built neighborhoods. The trails would be located within the MHPA preserve as allowed by the adopted MSCP. Figure 3-9 shows the trails plan for Plan 1.

e) Open Space Overlook (Trail Heads)

Subarea Plan 1 identifies three open space overlooks (see Figure 3-9) with educational signage and benches that will be maintained by the proposed Landscape Maintenance District.

f) MHPA Preserve Management

The proposed Subarea Plan describes the management requirements for the various components of the open space system. Pursuant to the adopted MSCP, the preserve would be dedicated to the City of San Diego and the long-term management of the preserve would be the responsibility of the City. A conceptual habitat management plan



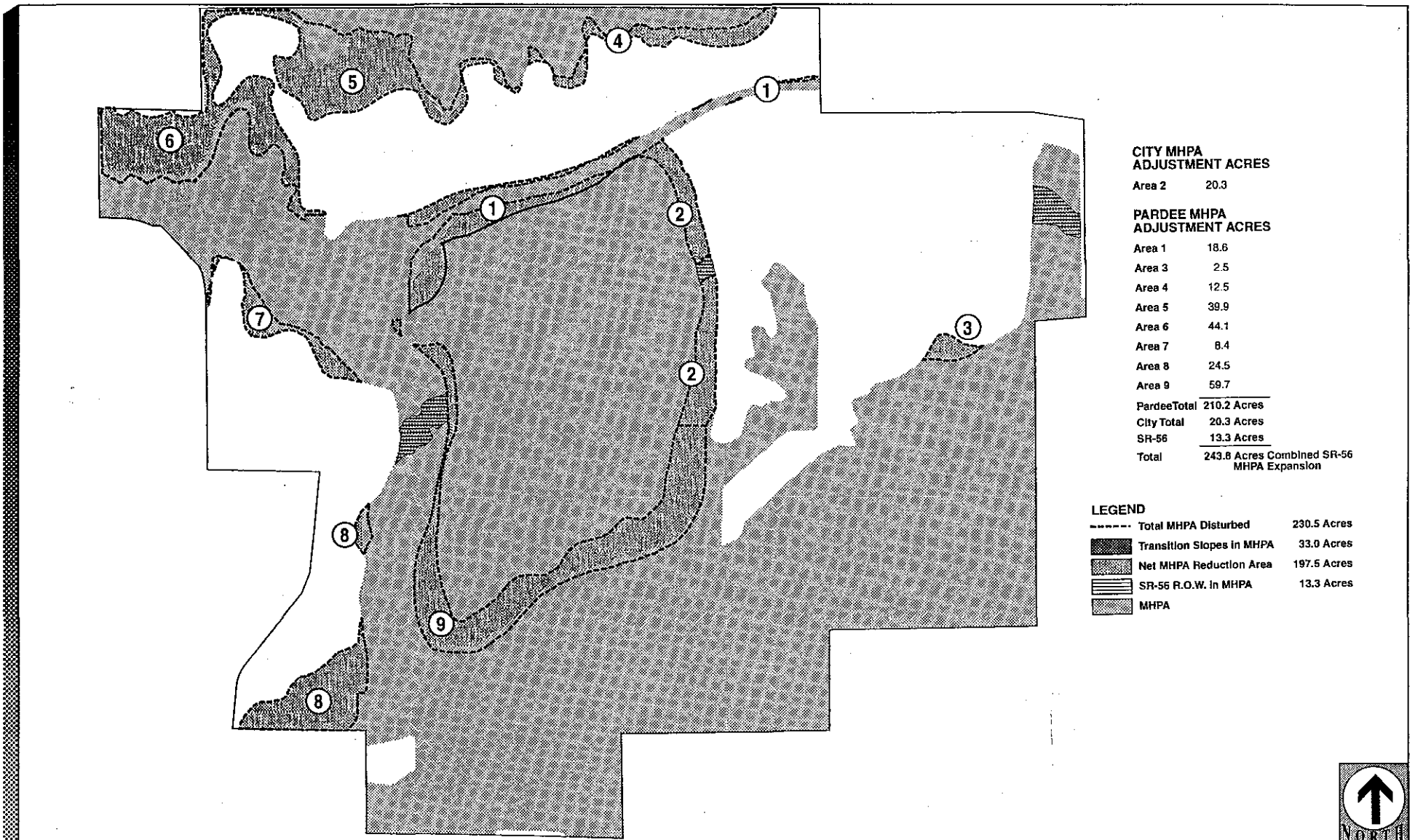
will be prepared for the Pacific Highlands Ranch project and incorporated into the Subarea Plan.

2) Subarea Plan 2

As shown in Figure 3-2, the open space system shown for Subarea Plan 2 is similar to Plan 1. However, with the more northerly alignment of SR-56, the interface with the MHPA open space along the southern portion of the site along McGonigle Canyon would be replaced by residential land uses rather than the freeway corridor forming the southern limit of development. In addition, the Del Mar Heights Road crossing of the north-south open space corridor linking McGonigle Canyon with Gonzales Canyon would be northerly of the location shown in Subarea Plan 1. This corridor would also be narrowed in the southwest corner of the project site. Overall, the encroachment into the MSCP preserve would be increased from approximately 161.41~~49.9~~ acres to 230.51~~2.0~~ (gross) acres under Plan 2. The Gonzales Canyon corridor would remain unchanged from Plan 1. The primary neighborhood parkway corridor would be shifted to the west abutting the boundary of the public high school and would replace the north-south urban amenity proposed in the Framework Plan. Its alignment is shown on Figure 3-2. The secondary neighborhood parkway would also abut the neighborhood park and elementary school in the northern portion of Pacific Highlands Ranch; however, it would not be connected to the Village. This neighborhood parkway would provide a corridor to the MHPA open space areas of Gonzales Canyon to the east and La Zanja Canyon to the north. Three open space overlooks would also be included in this plan as well.

As shown on Figure 3-10, the proposed development area for Subarea Plan 2 would be expanded into the defined MHPA open space boundary by approximately 230.51~~2.0~~ acres (gross). This total encroachment area is spread across the subarea and is similar to the encroachment described above for Plan 1. The major difference is in the southern portion of the site above McGonigle Canyon as described below.

- Both sides of the east-west urban amenity;
- Gentle slopes above McGonigle Canyon at the eastern boundary;
- Gentle slopes above McGonigle Canyon in the south-central portion of the site;
- Gentle slopes above McGonigle Canyon at the western boundary;
- North-facing slopes above La Zanja Canyon;
- East of the approved Del Mar Highland Estates subdivision and south of the existing off-site Senterra development; and



Map source: Latitude 33 Planning and Engineering 1998

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Figure 3-10

MSCP Preserve Encroachment Areas
Plan 2

- Along the edges of the north-south wildlife corridor between Gonzales and McGonigle Canyons.

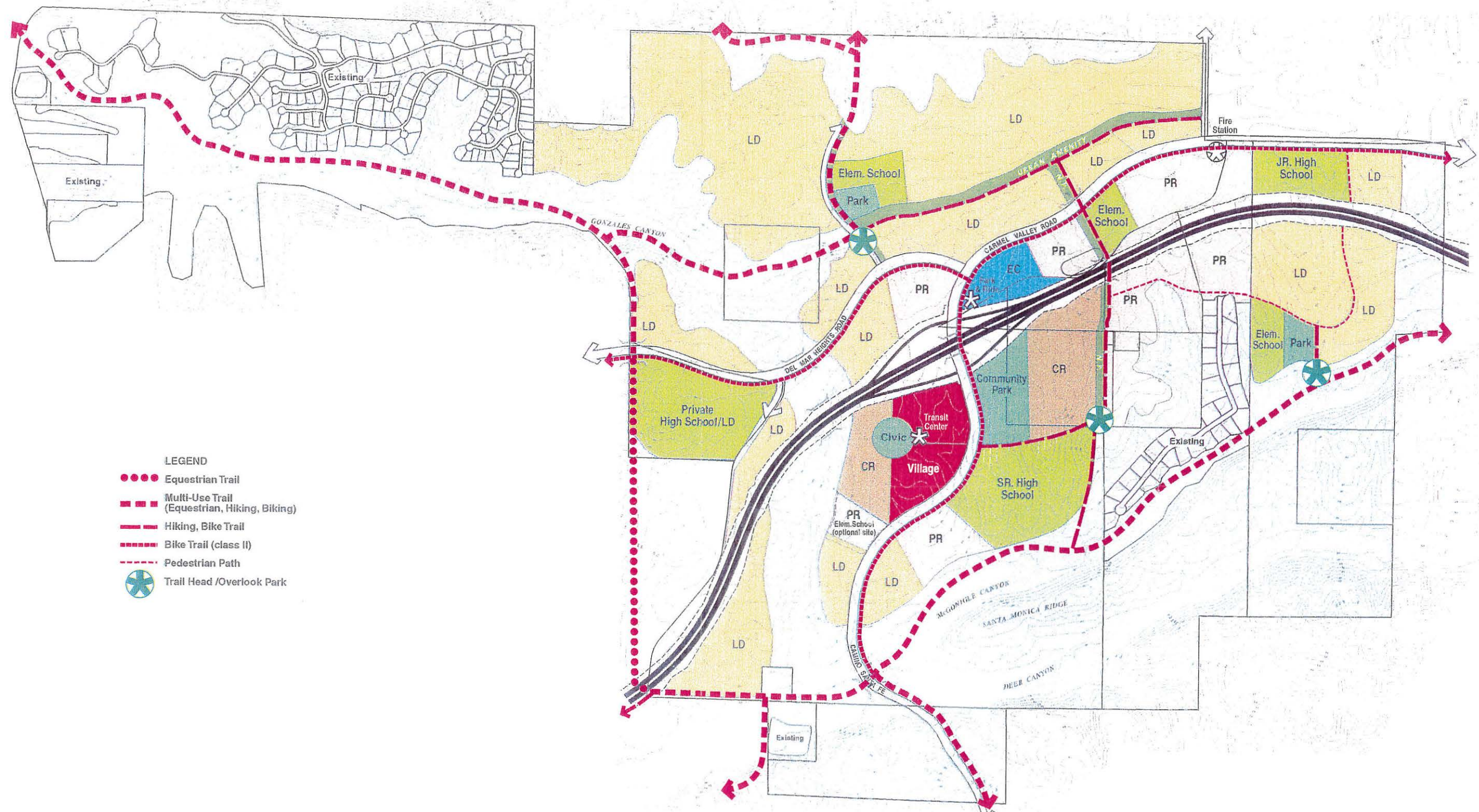
As with Plan 1, the natural open space system proposed under Plan 2 would also establish a system of wildlife corridors and habitat areas functionally equivalent with the MSCP. The on-site open space system would preserve the habitats and major wildlife corridors south of SR-56 (i.e., Deer and McGonigle Canyons and Santa Monica Ridge) and provide a desired northerly linkage/wildlife corridor via a north-south tributary canyon to Gonzales Canyon. Undercrossings are proposed beneath SR-56 and Del Mar Heights Road to facilitate wildlife movement. The steep north-facing slopes above La Zanja Canyon and the San Dieguito River valley along the northern boundary of the subarea would also continue to be a component of the natural open space system. Plan 2 also incorporates trails as shown in Figure 3-11.

E. Residential Element

The residential component of Pacific Highlands Ranch would consist of a variety of lot sizes and product types. The proposed densities would range from estate (0.25-1 dwelling units per acre [du/ac]) to the high density residential areas associated with the Village of the Town Center (34 du/ac).

This element would also comply with the affordable housing requirements of the Framework Plan. Fulfillment of this objective may be satisfied by:

- A set aside of no less than 20 percent of the units for occupancy by, and at rates affordable to, families earning no more than 65 percent of median area income, adjusted for family size, or
- Dedicating developable land of equivalent value.
- Residential development of more than 10 dwelling units must satisfy the City's Affordable Housing requirements. This requirement could be satisfied through the provision of affordable housing.
- Residential development of 10 or fewer housing units and residential development falling within the estate and very low density residential categories may, at the discretion of the City, satisfy the affordable housing requirements by donating to the city an amount of money equivalent to the cost of achieving the required level of affordability, into an NCFUA Affordable Housing Trust Account administered by the San Diego Housing Commission



Map Source: Latitude 33 Planing and Engineering 1998

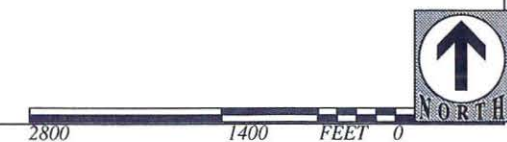


FIGURE 3-11
Trails System
Plan 2

The breakdown of residential uses for each of the subarea plans is shown in Table 3-1. The residential design features of each of the subarea plans are described below.

1) Subarea Plan 1

Subarea Plan 1 (see Figure 3-1) would encourage a diverse mix of residential densities and product types. Approximately 4,974 new residential dwelling units would be allocated to Pacific Highlands Ranch under this land use plan. The residential units would be distributed throughout the subarea, and the proposed diversity of housing types would be intended to increase housing choice and affordability. A balanced distribution of housing types is proposed, with approximately 63.6 percent (3,161 units) of the units proposed as single-family and 36.4 percent (1,813 units) proposed as multi-family units.

The highest density of residential uses (34 du/ac) would occur within the Village of the Town Center (maximum of 500 dwelling units at build-out). The areas adjacent to the Village are shown as "core residential" (9-14 du/ac) on the land use plan and would be located adjacent to the Village area, north of SR-56 and south of Carmel Valley Road. These two densities would comprise the attached multi-family product types which total approximately 1,813 units (36.4 percent). The remainder of the residential units would consist of detached single-family units in a variety of lower densities: very low, low, and peripheral residential. The very low density (0.25-1 du/ac) residential areas would be primarily located in a non-contiguous portion of the subarea, along the western boundary of Del Mar Highlands Estates. Low density (2-5 du/ac) uses would be primarily sited north of Carmel Valley Road. "Peripheral residential" (5-9 du/ac) densities would be generally located along the SR-56 corridor and the area immediately north of the Town Center. There would also be small areas of low density, and peripheral residential which accompany the existing Rancho Glens Estates very low density development south of the SR-56 alignment. Overall, the residential densities proposed would be less intense the further away from the Town Center, but each residential component would be integrated into the plan by trails, bikeways, urban amenity open space, and streets. The trail system would accommodate walking, biking, and jogging activities and would provide access to the Town Center, civic areas, schools, and parks. The subarea plan would also include design principles which address open space, setbacks, garage siting, street patterns, and housing types and density.

2) Subarea Plan 2

Subarea Plan 2 would incrementally increase the allowed number of dwelling units up to 4,974³ new residential units, with approximately 65 percent (3,240) being single-family and 35 percent (1,734³) being multi-family. The acreages of each residential type and the corresponding maximum number of dwelling units are also provided in Table 3-1.

As shown in Figure 3-2, the more northerly alignment of SR-56 substantially would alter the residential layout under Plan 2 by narrowing the developable area between the freeway alignment and the Del Mar Heights Road/Carmel Valley Road corridor. The width between the Del Mar Heights Road/Carmel Valley Road corridor and the Gonzales Canyon urban amenity to the north would also be restricted. Because of these physical parameters, the resulting residential land use pattern in the northern portion of the subarea would generally consist of smaller and narrower residential development areas.

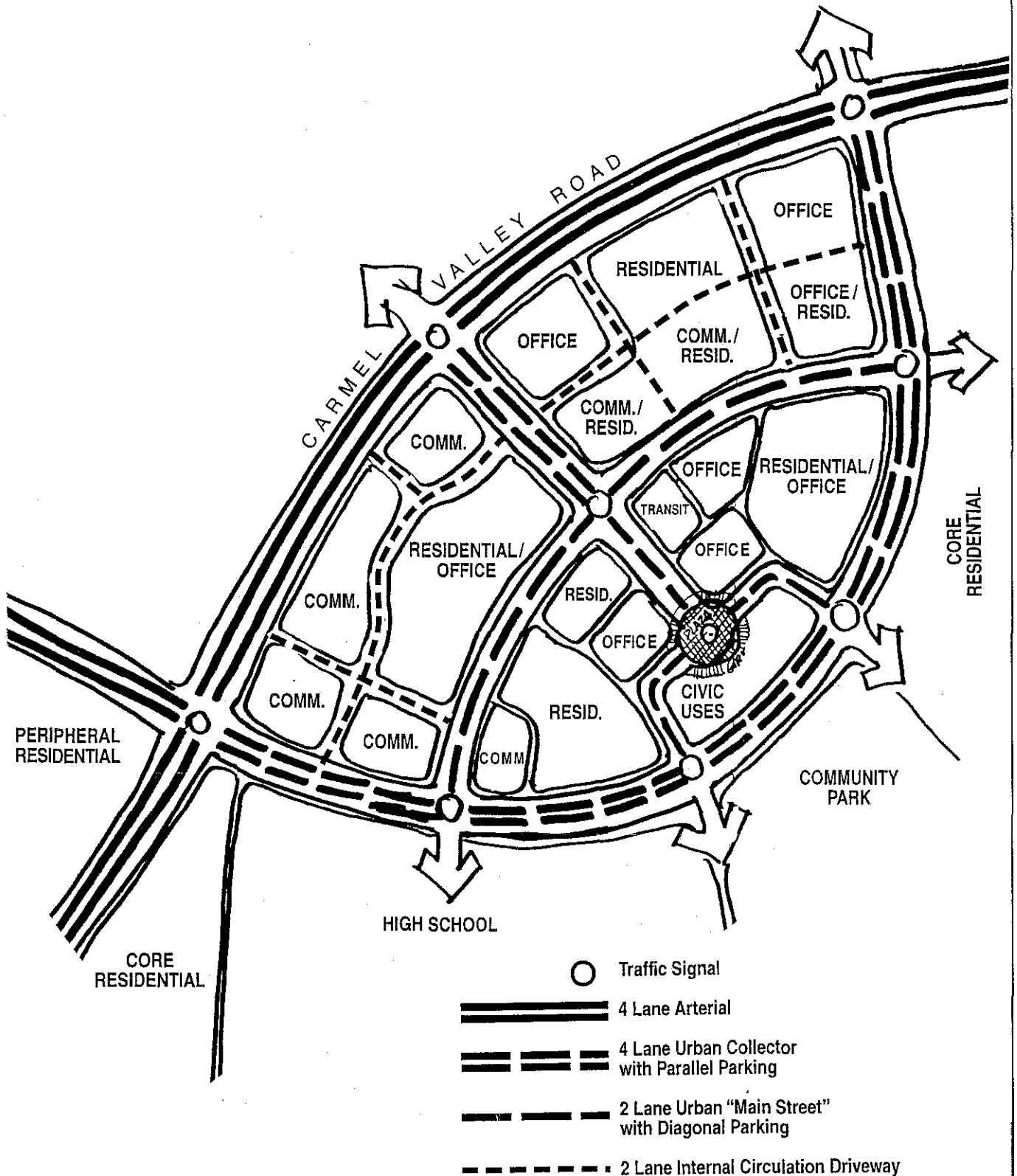
The residential uses south of the SR-56 alignment would also differ in the central portion of the subarea from Plan 1 because of the relocation of the freeway and the movement of the Town Center. The residential densities and locations are generally similar to Plan 1 at the eastern and western portions of the site. However, the low-density residential development shown at the southwestern boundary would be extended to the southern boundary under Plan 2 and access to the existing CUP would be from the west rather than from Camino Santa Fe on the east.

F. Town Center Element

The Pacific Highlands Ranch land use plan would include a Town Center, which would be generally located east of the intersection of Del Mar Heights Road and Carmel Valley Road. This land use designation would allow for a combination of commercial, office, high density residential, and public uses. The Town Center and its relationship to each of the land use plans are described below. The Town Center would be pedestrian-oriented providing retail, commercial, and employment uses for the Pacific Highlands Ranch. Within the Town Center is the Village. The Village consists of residential, commercial, and civic uses and is discussed below. Figures 3-12 and 3-13 illustrate conceptual site layouts of these uses under Plans 1 and 2, respectively.

1) Subarea Plan 1

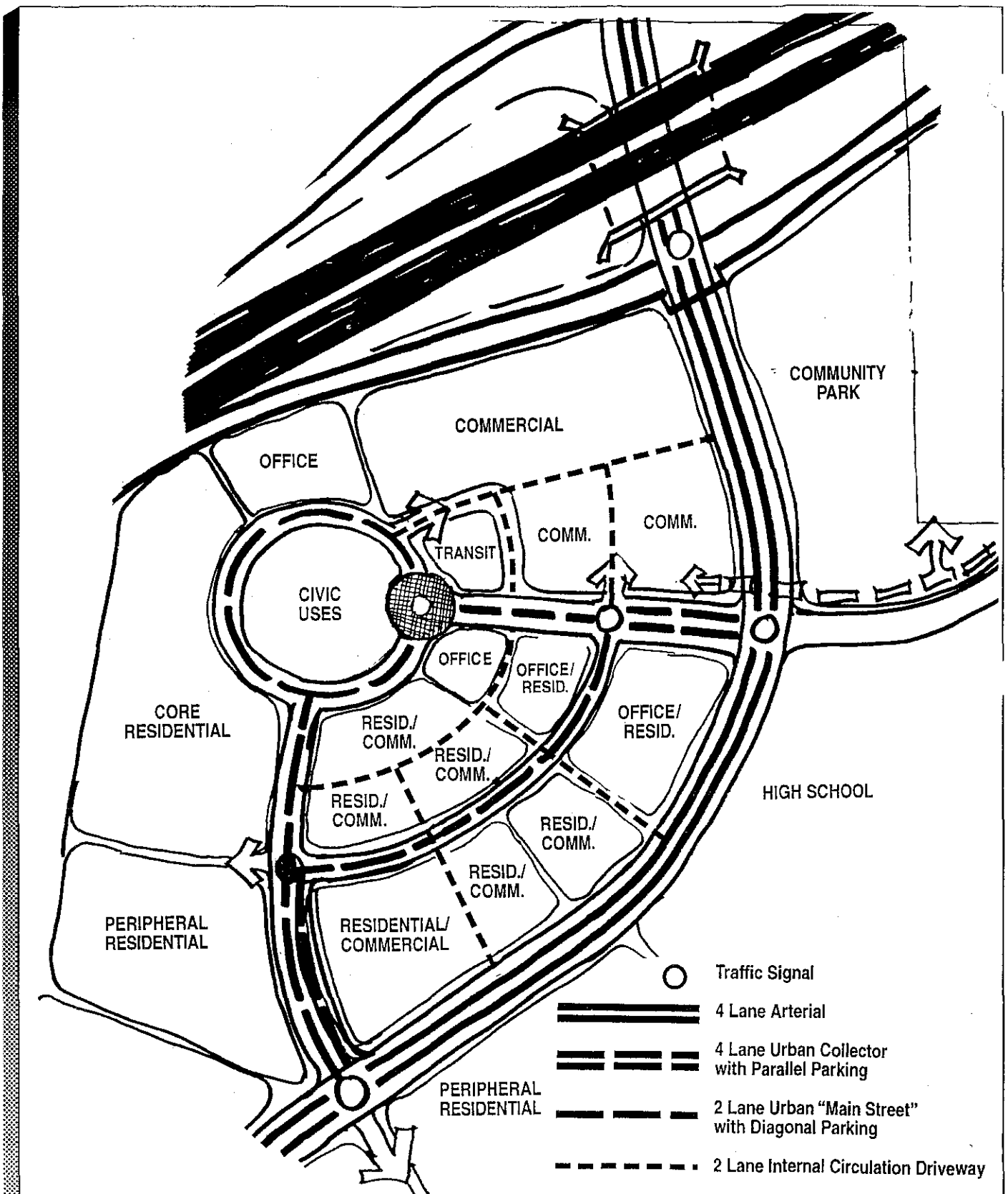
The 2405-acre Town Center includes approximately 1,500 dwelling units, up to 300,000 square feet of retail and office space, a 50-acre senior high school, a 20-acre junior high school, a 2013-acre community park, a 65-acre civic use area, and a 200,000-square-foot employment center. As shown on Subarea Plan 1 (see Figures 3-1 and 3-12), the Village component of the Town Center would consist of approximately 150,000 square feet of commercial retail uses, 150,000 square feet of commercial office uses, 500 high density residential units, and civic use area on approximately 33 acres at the northeast quadrant of the SR-56/Camino Santa Fe interchange. The Village would be readily accessible via SR-56 and would be immediately east of the Del Mar Heights Road/Carmel Valley Road intersection and would include a transit center at the core of the area. This area also would be served by the extensive system of pedestrian and bicycle paths. A civic area



Source: Latitude 33 Planning and Engineering 1997

FIGURE 3-12

Town Center Village, Plan 1 Land Use Concept



Source: Latitude 33 Planning and Engineering 1997

FIGURE 3-13

**Town Center Village, Plan 2
Land Use Concept**

(i.e., transit center, pedestrian plaza, and library) would also be proposed in the Village, and Core residential, and a 13-acre community park are adjacent to the Village. Other allowable uses within the Village would include child care centers, community centers, and churches. Design principles for the Village are would be included in the subarea plan.

Employment Center

An approximately 200,000-square-foot employment center and a park-and-ride facility would be proposed on a 20-acre site south of the Village in the Town Center, north of the SR-56/Camino Santa Fe interchange. Access to the facilities located in the Village and surrounding land uses would be provided for by the incorporation of pedestrian connections and street systems in the design of the plan.

2) Subarea Plan 2

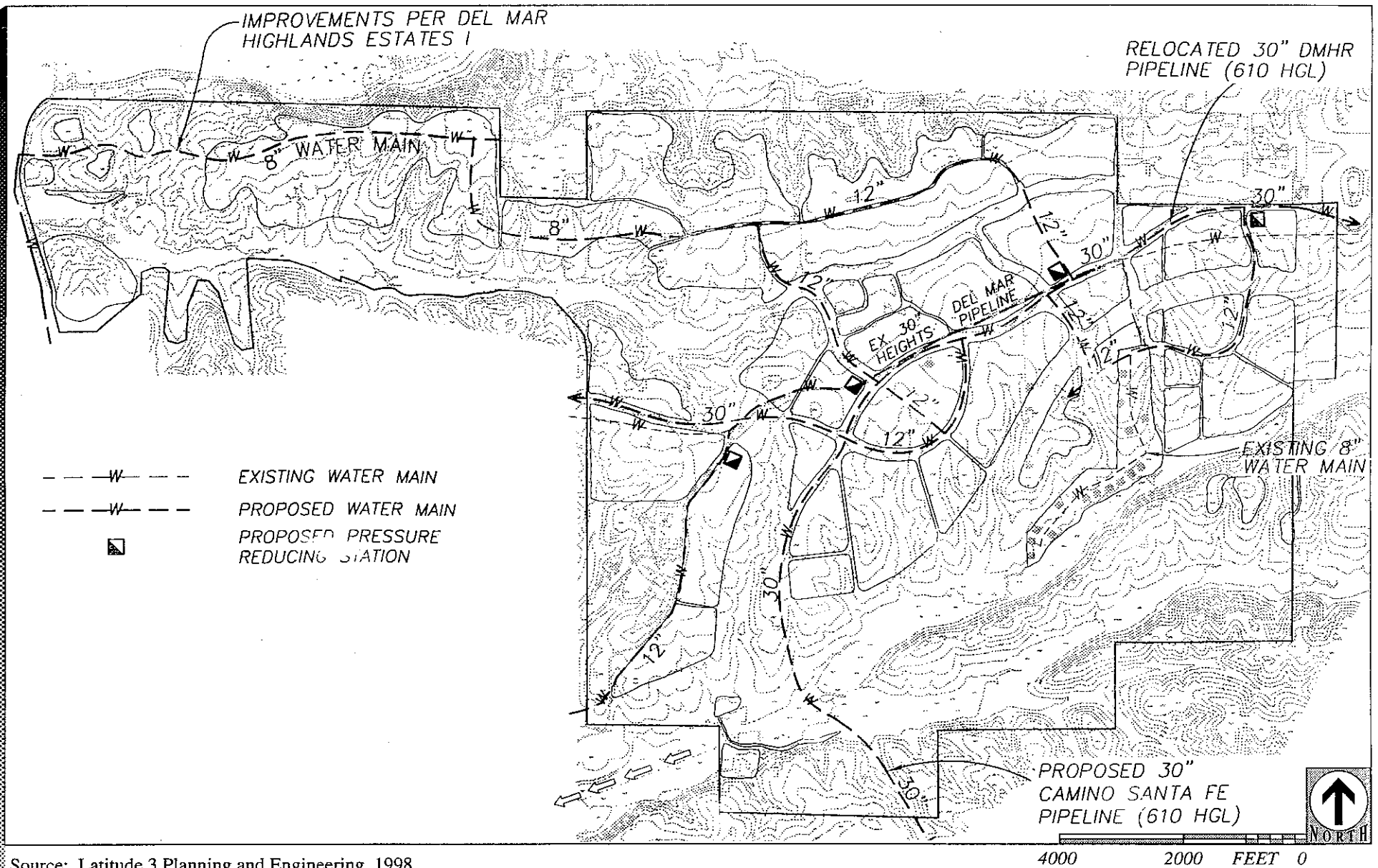
The 215-acre Town Center includes up to 300,000 square feet of retail and office, a 50-acre high school, a 20-acre community park, and a 5-acre civic use area. The acreages and square footages associated with each of the land uses would be similar to those described for Subarea Plan 1 above. However, with the northerly freeway location and shifting of the SR-56/Camino Santa Fe interchange to the east, the Town Center area would be located on the south side of the freeway (see Figure 3-2). Camino Santa Fe would border the Village on the east rather than the west and would provide access to the various uses. The 20-acre community park would be moved to the east of Camino Santa Fe and the Village and adjacent to the senior high school and the SR-56 interchange with Carmel Valley Road (see Figure 3-13).

Employment Center

The employment center under Subarea Plan 2 would not be adjacent to the Village and would be shifted to the northeast quadrant of the Camino Santa Fe/SR-56 interchange. The acreage would be 16 acres but the square footage would be similar to those described for Subarea Plan 1.

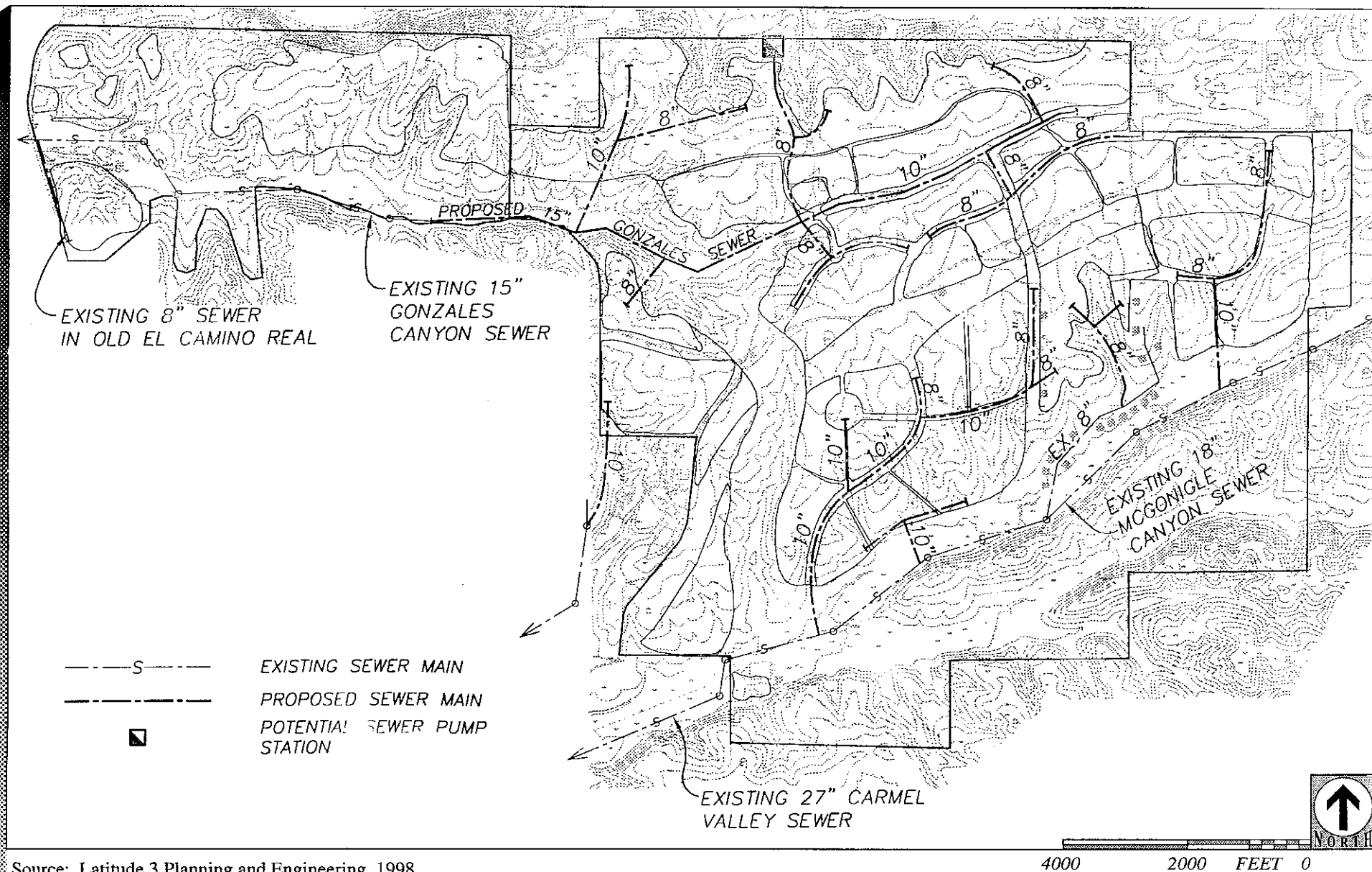
G. Community Facilities Element

Public facilities that would be provided within Pacific Highlands Ranch include schools, a library, a fire station, water and sewer facilities, and parks. Overall, Pacific Highlands Ranch would require one community park, three elementary schools, two neighborhood parks, a junior high ~~(and an optional junior high school site)~~, a public and private high school, a public library, a fire station, and water and sewer collection mains. Figures 3-14 through 3-17 illustrate the proposed alignments for water transmission and sewer



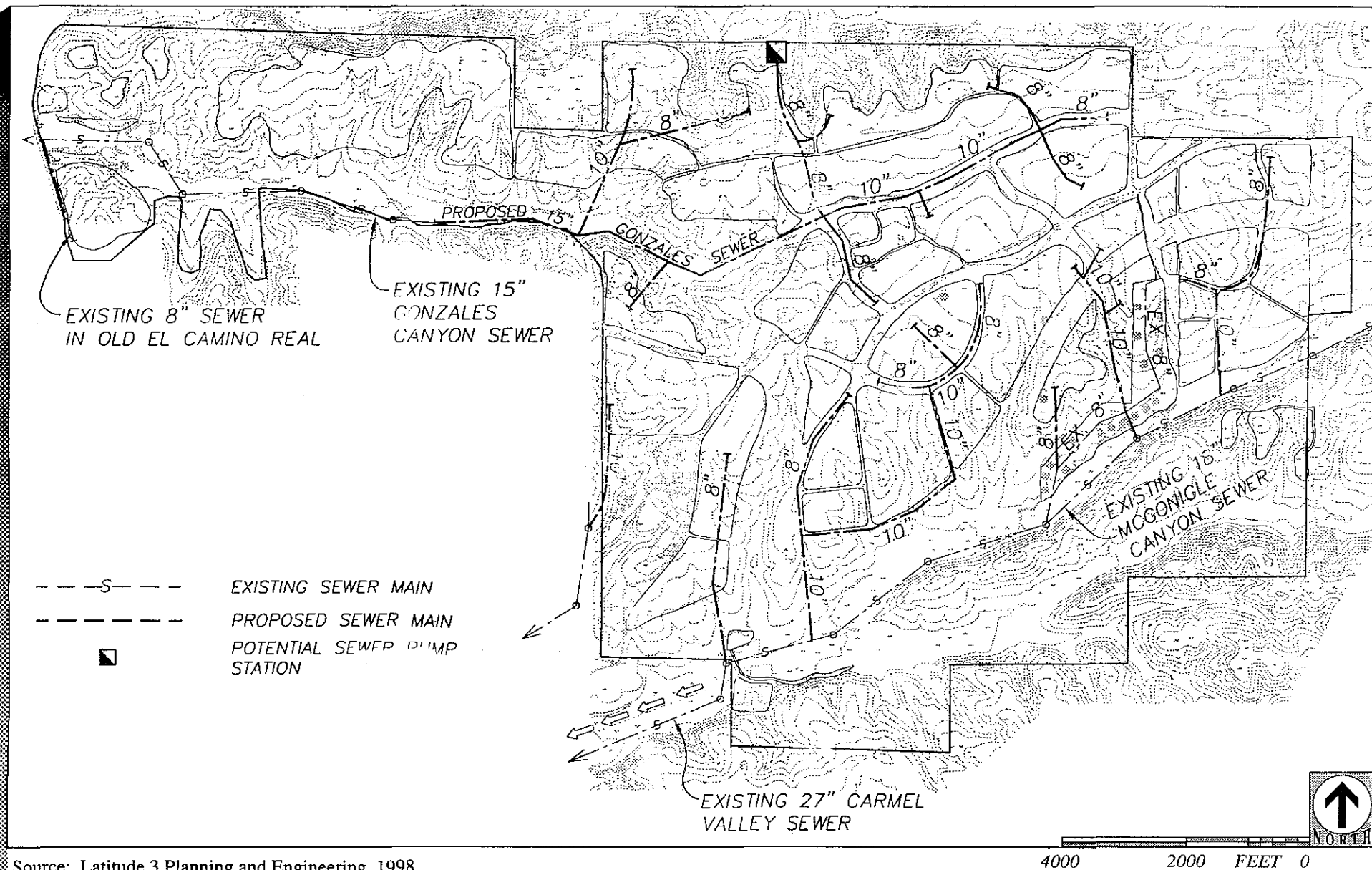
Source: Latitude 3 Planning and Engineering 1998

FIGURE 3-14
Conceptual Water Transmission Mains - Plan 1



Source: Latitude 3 Planning and Engineering 1998

FIGURE 3-17
Conceptual Major Sewer Facilities - Plan 2



Source: Latitude 3 Planning and Engineering 1998

FIGURE 3-16
Conceptual Major Sewer Facilities - Plan 1

collection mains for both land use plans. As described above, some of these public facilities would be sited within the Town Center and Village. Other community facilities would be located throughout the subarea and are described below for each of the subarea plans.

1) Subarea Plan 1

As shown in Figure 3-1, Subarea Plan 1 would include two 5-acre neighborhood parks, a 5-acre civic use area, and a 13-acre community park. Two of the elementary schools would be located adjacent to neighborhood parks while the third elementary school would be a stand-alone facility. One of the neighborhood parks would be proposed in the central portion of the subarea northwest of Carmel Valley Road near the urban amenity open space, with the other near the eastern subarea boundary and south of SR-56. The 13-acre community park would be sited adjacent to the senior and junior high schools and would be integrated as part of the overall core concept. Uses associated with the community park could include athletic fields, multipurpose courts, picnic facilities, trail and bikeway connections, play areas, and recreation buildings. The 5-acre civic use area would be located in the Village and would include the public library, community meeting room, and the area would be used for civic activities and open-air public gatherings. The civic use area would be connected with the rest of Pacific Highlands Ranch by trails and mass transportation.

Three elementary schools would be sited in cooperation with the Del Mar Union Elementary and Solana Beach Elementary School Districts. The elementary school sites conform to the Progress Guide and General Plan standard of 10 net usable acres. The land use plan would also include a 50-acre public high school site south of the Village, and a 20-acre junior high school, both of which would serve the San Dieguito Union High School District. A private high school and church on the Catholic Diocese of San Diego ownership, encompassing approximately 54 acres at the western boundary south of Del Mar Heights Road, would also be part of Subarea Plan 1. This high school campus would have a student population of approximately 2,200 students.

Subarea Plan 1 would also include a library site as part of the 5-acre civic use area, which exceeds the General Plan requirements. This site would accommodate the library facility. The library facility would be sited with other civic uses within the Village.

A 3.0-acre double fire station (includes a wildfire unit) would be sited in the northeastern portion of the proposed Pacific Highlands Ranch in a neighborhood of low-density residences (see Figure 3-1). The fire station would serve the entire subarea and would allow for the achievement of the City of San Diego's average response time goals.

2) Subarea Plan 2

Development of the subarea under Subarea Plan 2 would require similar public facilities, but as with the other components of the land use plan, the SR-56 alignment would modify the location of these uses. As shown in Figure 3-2, the western elementary school/neighborhood park location would move to the north side of the east-west urban amenity in the northern portion of the subarea. The eastern elementary school/neighborhood park would not be relocated. The 20-acre community park would be sited outside of the Village adjacent to the high school and south of SR-56. The civic use area (library and meeting rooms) would continue to be a component of the Village south of the freeway.

H. Circulation Element

The major arterial circulation system within Pacific Highlands Ranch would consist of Carmel Valley Road, Del Mar Heights Road, Camino Santa Fe, and State Route 56. The alignment and configuration of each of the arterial facilities would generally be consistent with the adopted Framework Plan. However, the Framework Plan alignment for SR-56 is southerly from the two alignments addressed in this EIR. This other alignment, referred to as the central alignment, is addressed as an alternative to the proposed project in Chapter 6 and is described in detail as part of the SR-56 EIR. With the movement of SR-56 into the development area, the precise alignments of the major on-site arterials have been refined in the subarea plans. As proposed in the subarea plans, both Carmel Valley Road and Del Mar Heights Road would be constructed as six-lane major arterials. Camino Santa Fe would extend southerly from SR-56 as a four-lane arterial. As proposed by the City, SR-56 would be a six-lane freeway with one interchange within Pacific Highlands Ranch.

The circulation system for Pacific Highlands Ranch is based upon one interchange at Camino Santa Fe, and has been thoroughly reviewed and approved by the City Engineer. However, the development of an additional interchange along SR-56 is not precluded, but will result in necessary plan amendments to accommodate changes in the land use plan.

The precise alignment of the freeway alignments and other project area roadways are described for each land use plan below. It should be noted that another northerly alignment is included in the revised EIR for SR-56 (City of San Diego 1998). This alignment, described as the northern alignment, is similar to the "F" alignment associated with Subarea Plan 1. As such, any modifications to the proposed land use in plan 1 for Subarea III to accommodate this "northern" alignment would be within the range of alternatives addressed in the EIR, the two EIRs prepared for SR-56, and the NCFUA Framework Plan EIR.

1) Subarea Plan 1

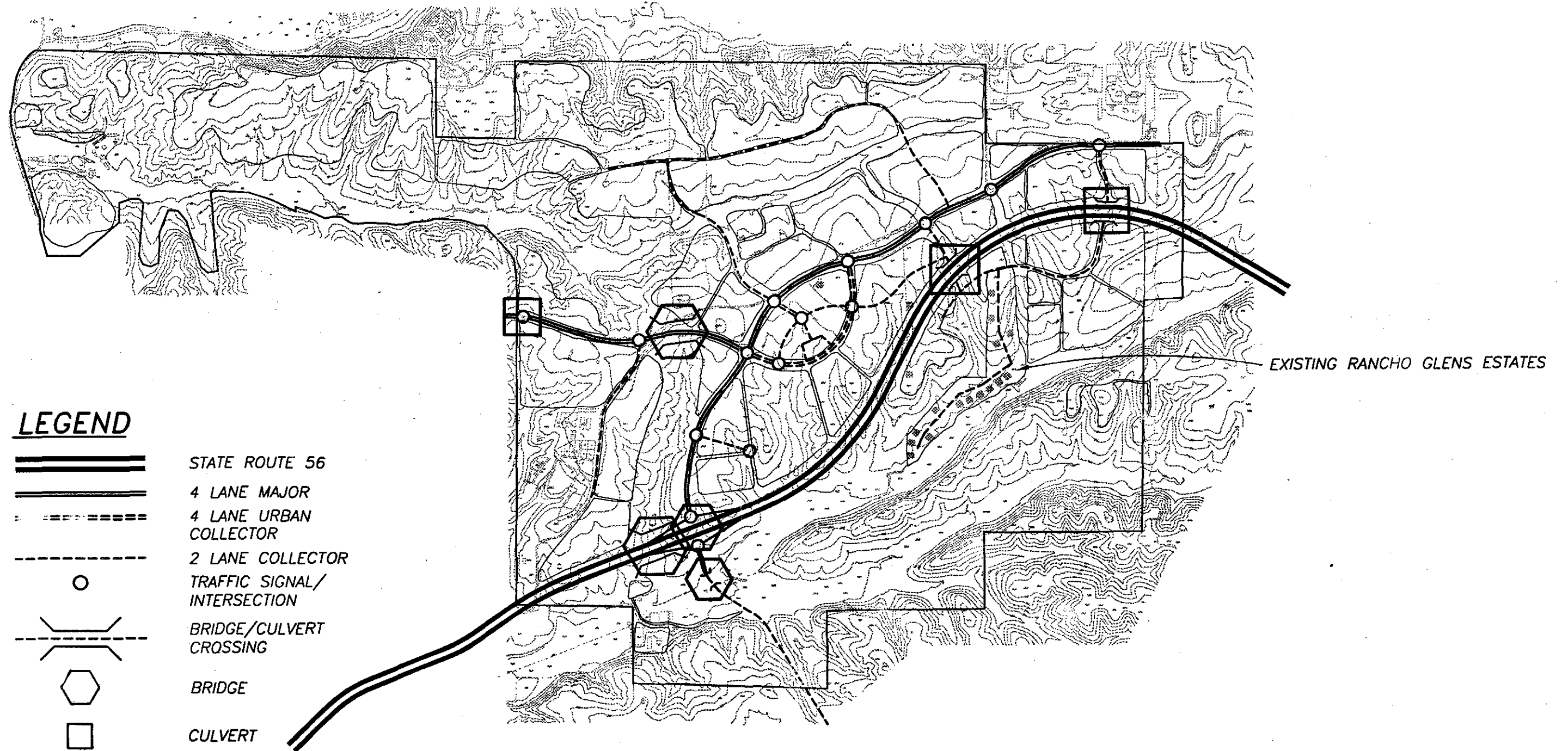
As shown in Figure 3-18, Del Mar Heights Road would enter Pacific Highlands Ranch from the Carmel Valley community and terminate at its intersection with Carmel Valley Road. Del Mar Heights Road is designated in the General Plan and the Framework Plan for ultimate improvement in its current location as a six-lane major arterial with a 120-foot right-of-way. Subarea Plan 1 would be consistent with this designation and alignment. In order to facilitate wildlife movement, a bridge on Del Mar Heights Road would be proposed over the north-south MSCP open space corridor just west of its intersection with Carmel Valley Road.

Carmel Valley Road would be extended northeasterly from its intersection with Del Mar Heights Road to the eastern boundary of the subarea. This alignment roughly parallels the SR-56 alignment shown in Subarea Plan 1. Carmel Valley Road would extend southerly to Camino Santa Fe at SR-56. Camino Santa Fe proceeds to the southern boundary of the subarea. As with Del Mar Heights Road, a bridge would be provided on Camino Santa Fe south of SR-56 to allow east-west wildlife movement within the MSCP corridor along the southern boundary of the subarea.

SR-56 shown for Subarea Plan 1 represents "Alignment F" as presented in the draft EIR for the middle segment of SR-56 currently being prepared by the City. SR-56 crosses the entire NCFUA (see Figure 3-3) in an east-west direction, connecting Interstate 5 and Interstate 15. The easternmost and westernmost segments of SR-56 (2.3 and 1.8 miles long, respectively) are located outside of the NCFUA and already have been completed. Beginning at the western subarea boundary, this alignment primarily traverses disturbed agricultural land and proceeds northeasterly, north of the existing Rancho Glens Estates subdivision, and then easterly to the eastern project boundary. An interchange is proposed at Camino Santa Fe.

In addition to the major roadways within Pacific Highlands Ranch, Plan 1 would propose several connector streets to provide local circulation within the subarea, connecting the Village with residential areas and public facilities. These local connector streets would be intended to carry moderate levels of local traffic and would include bicycle lanes and pedestrian paths. The connector system would be designed to discourage through traffic between the major arterials in Pacific Highlands Ranch.

Within the Village, the local and collector streets would accommodate larger numbers of pedestrians, slow automobile traffic, promote use of mass transit, and provide on-street parking. The Village would be the center of the mass transit system in Pacific Highlands Ranch. From this central transit stop, transit routes would continue along Del Mar Heights Road and Carmel Valley Road and would connect with the transit route along



Source: Latitude 33 Planning and Engineering 1997

FIGURE 3-18
Subarea Plan 1 Circulatin System
(SR-56 Alignment F)

SR-56. Additional transit stops would be located along the routes and would be sited adjacent to public facilities wherever possible.

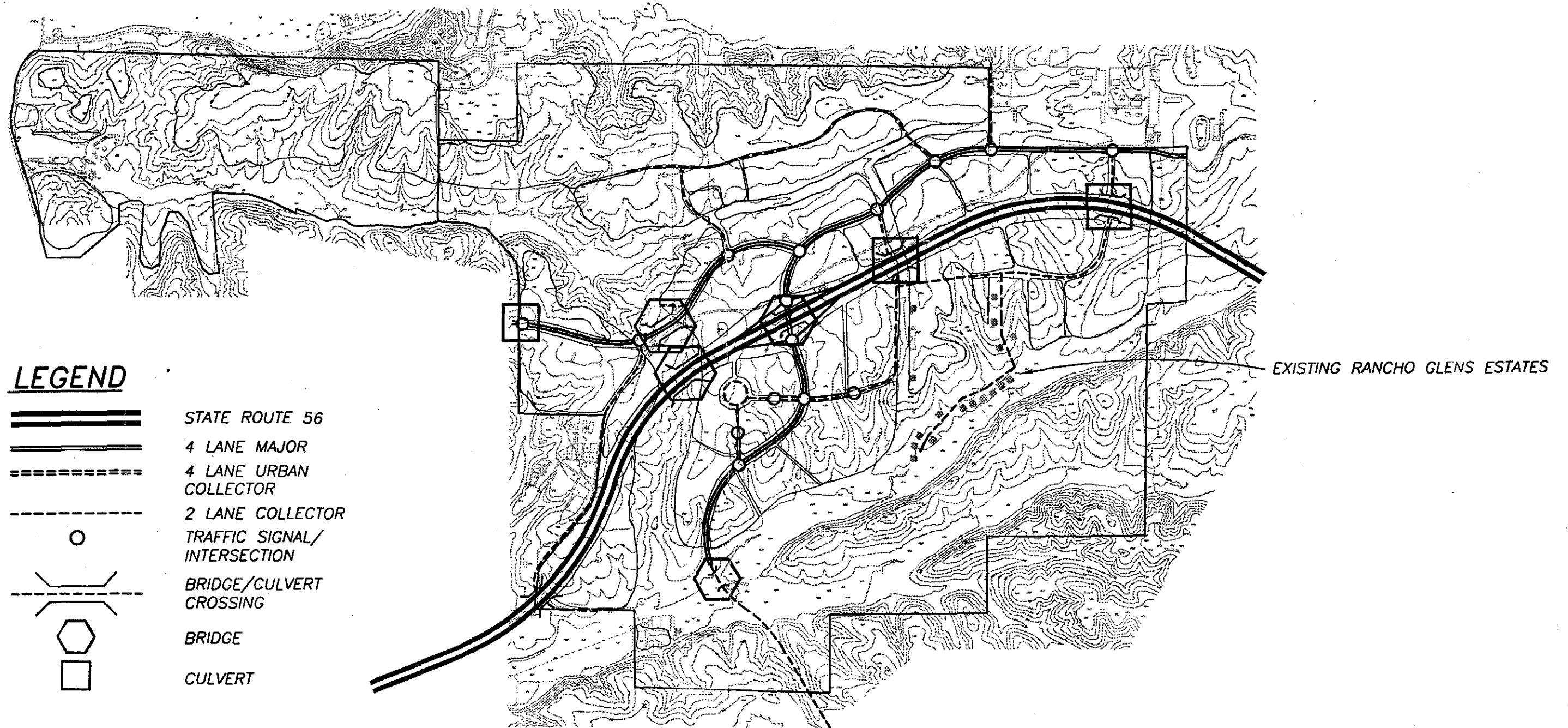
Subarea Plan 1 would also provide a system of bicycle, pedestrian, and equestrian routes (see Figure 3-9). The pedestrian and bicycle routes would connect the Village, public parks, and residential areas. The bikeways would also connect with the city-wide bikeway system. Equestrian trails would be provided within the MSCP open space which would provide linkages to the existing off-site trail systems to the north and south of Pacific Highlands Ranch.

2) Subarea Plan 2

As shown in Figure 3-19, the basic circulation components required in the Framework Plan would also be incorporated into Plan 2 with the more northerly alignment of SR-56 (Alignment "D"). The major circulation element roads would continue to consist of Carmel Valley Road, Del Mar Heights Road, Camino Santa Fe, and SR-56 freeway corridor. However, Alignment "D" would traverse Pacific Highlands Ranch in a diagonal manner and alter the backbone circulation system proposed under Plan 1.

Specifically, the transition from Del Mar Heights Road to Carmel Valley Road would be more linear from east to west and would roughly parallel SR-56 approximately 800 feet north of the freeway alignment. This east-west roadway through the subarea would be north of the Plan 1 location, as Del Mar Heights Road would trend northeasterly rather than southeasterly to the intersection with Carmel Valley Road. The intersection of Del Mar Heights Road and Carmel Valley Road would be approximately 2,400 feet east and approximately 3,000 feet north of the Subarea Plan 1 location. With this change the Camino Santa Fe/SR-56 interchange would also be north and east of the Plan 1 location.

In addition to the major roadways within Pacific Highlands Ranch, Plan 2 would propose a different pattern of connector streets to provide local circulation within the subarea, connecting the Village with residential areas and public facilities south of the SR-56 alignment. These local connector streets would also be designed to carry moderate levels of local traffic and would include bicycle lanes and pedestrian paths. Subarea Plan 2 would also provide a system of bicycle, pedestrian, and equestrian routes (see Figure 3-11). The pedestrian and bicycle routes would connect the Village, public parks, and residential areas. The bikeways would also connect with the city-wide bikeway system. Equestrian trails would be provided within the MSCP open space and would provide linkages to the off-site trail systems that exist to the north and south of Pacific Highlands Ranch.



Source: Latitude 33 Planning and Engineering 1997

FIGURE 3-19
Subarea Plan 2 Circulation System
(SR-56 Alignment D)

I. Implementation and Phasing

The Pacific Highlands Ranch Plan would be implemented through the proposed phase shift, General Plan/Framework Plan amendment, Development Agreement, master rezoning, and the processing of future specific development proposals within subarea NCFUA. The Pacific Highlands Ranch Plan would describe these processes and provide a detailed design guideline for each of the proposed zone designations in the subarea. The proposed design principles are cited in this EIR as part of the recommended mitigation measures.

J. Anticipated Future Projects

It is the intent of this MEIR to streamline future environmental review of subsequent development (tentative maps) by analyzing the potential impacts of the Pacific Highlands Ranch Plan at a level that will be sufficient for future projects where possible and to provide a framework for future impact analysis and mitigation consistent with this MEIR. Anticipated approvals needed to implement the Pacific Highland Ranch project would include tentative subdivision maps for the 1,665-acre Pardee Construction Company ownership, a conditional use permit for a private high school and parish church on the 54-acre Catholic Diocese Church ownership, development plans for the designated elementary school and high school sites by the affected school districts, and tentative subdivision maps for the several other ownerships within the subarea.

At the time a future project is submitted, the City will prepare an Initial Study to determine whether the project may cause any significant impact that was not examined in this MEIR and whether the project was described as being within the scope of the Pacific Highlands Ranch Plan. If it is determined that the subsequent project will have no additional significant impacts and no new or additional mitigation measures or alternatives are required, then written findings can be made based on the Initial Study and no new environmental document will be required. If the Initial Study findings cannot be made, then either a Mitigated Negative Declaration or Focused EIR will be required as specified in CEQA Sections 21157.5 and 21158. Use of this MEIR is further limited in accordance with CEQA Section 21157.6.

This MEIR also analyzes the discretionary actions needed for the future actions (i.e., community plan and precise plan amendments, tentative map revisions, rezonings, planned development permits, etc.) associated with the Precise Plan for Carmel Valley Neighborhood 10. The environmental impacts associated with those revisions are addressed in the biology, traffic, and landform alteration sections of this MEIR. All other potential impacts are insignificant. The EIRs previously prepared for Carmel Valley Neighborhood 10 are incorporated herein by reference. Additional environmental action or consideration associated with revisions to Neighborhood 10 necessary to implement

the future discretionary actions described in the contemplated Development Agreement would not be necessary.

K. Discretionary Approvals Required

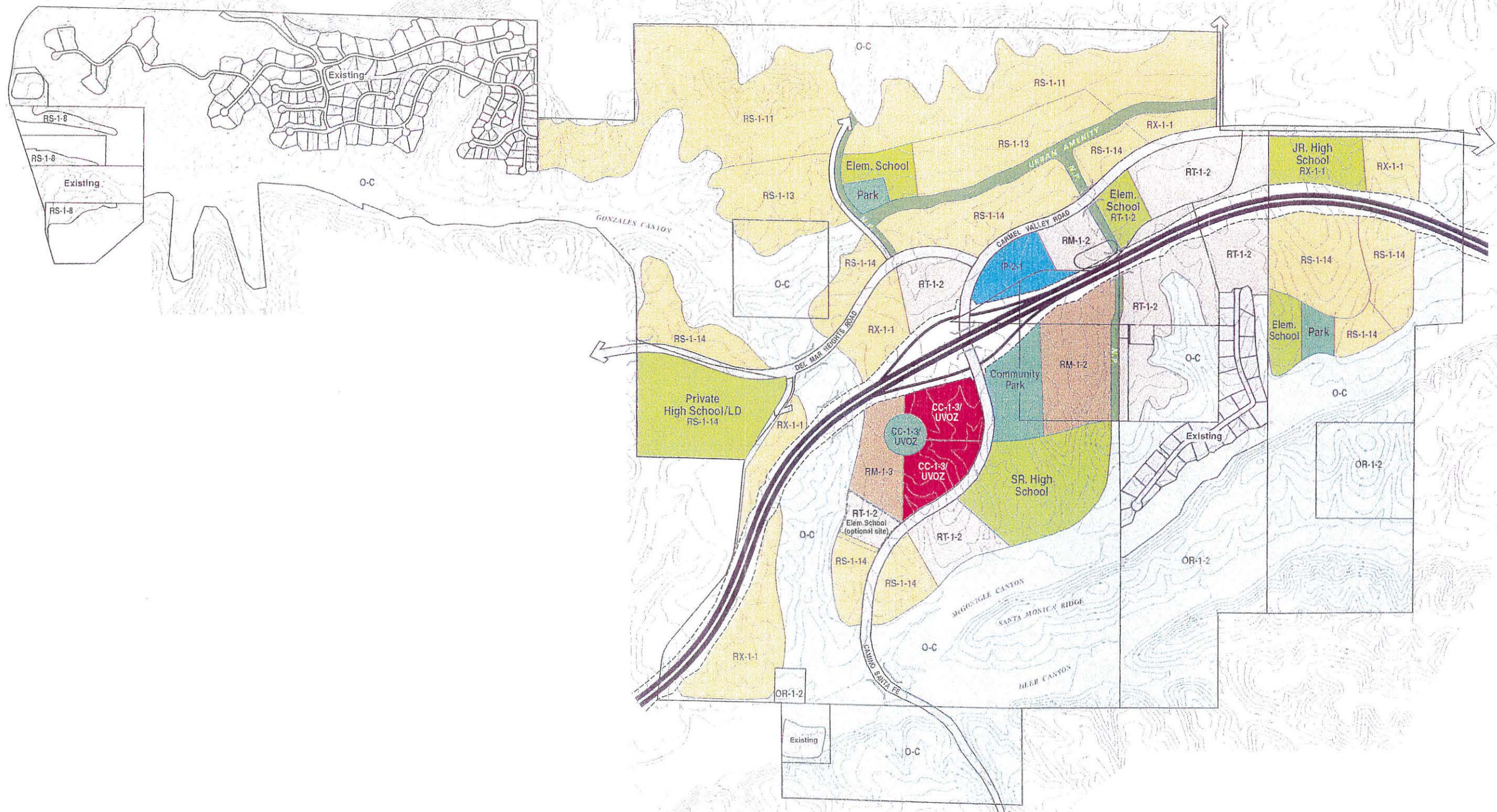
Discretionary approvals required by the City of San Diego for Pacific Highlands Ranch would include a General Plan Amendment and NCFUA Framework Plan Amendment, adoption of the subarea plan, master rezoning, a North City Local Coastal Plan Amendment, MSCP Subarea Plan Amendment and MHPA boundary adjustment, and conferring Third Party Beneficiary status. In addition to City Council approval of the GPA and phase shift in conjunction with Pacific Highlands Ranch Plan approval, the GPA and phase shift must be approved by a majority vote of the city's electorate in a general election. Each of the necessary approvals by the City Council and approvals/permits that may be required from other agencies are discussed below:

General Plan Amendment/NCFUA Framework Plan Amendment: An amendment to the adopted General Plan/NCFUA Framework Plan is required to reflect the refinements to the subarea boundary, land uses (location, acreage, and residential densities), Environmental Tier size and configuration, and circulation pattern (e.g., State Route 56 alignment) proposed in the subarea plan.

Pacific Highlands Ranch Subarea Plan Approval: This action includes adoption of a land use plan proposed in the subarea plan and the approval of a Public Facilities Financing Plan (PFFP). The PFFP identifies the funding mechanisms and timing for the construction of the necessary public facilities within the subarea. These facilities may include arterial roadways, bridges, transit facilities, libraries, parks, police and fire stations, and drainage facilities.

Master Rezoning: The existing zoning within Pacific Highlands Ranch consists almost entirely of agricultural zoning (A-1-10). The proposed master rezoning for the subarea is shown in Figures 3-20 (Plan 1) and 3-21 (Plan 2). These zones would become effective with voter approval of a phase shift.

MHPA Boundary Adjustment: This action would amend the City's MHPA to include the sensitive habitats located in Neighborhood 8A and Subarea V (Deer Canyon and Lorenz Parcels as shown in Figure 3-5) of the NCFUA while removing other less sensitive areas within Pacific Highlands Ranch (approximately 150 acres) and Carmel Valley Neighborhood 10 (approximately 8.41 acres) from the preserve system. The Third Party Beneficiary Status already granted for Neighborhood 10 with the City's approval of the MSCP Subarea Plan will remain and would include the 8.41-acre boundary adjustment. Concurrence by the wildlife agencies is required for the MHPA boundary



Map Source: Latitude 33 Planing and Engineering 1998

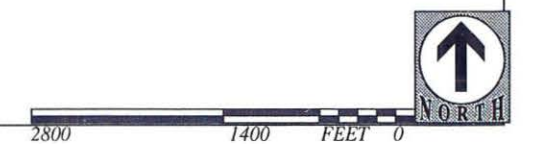
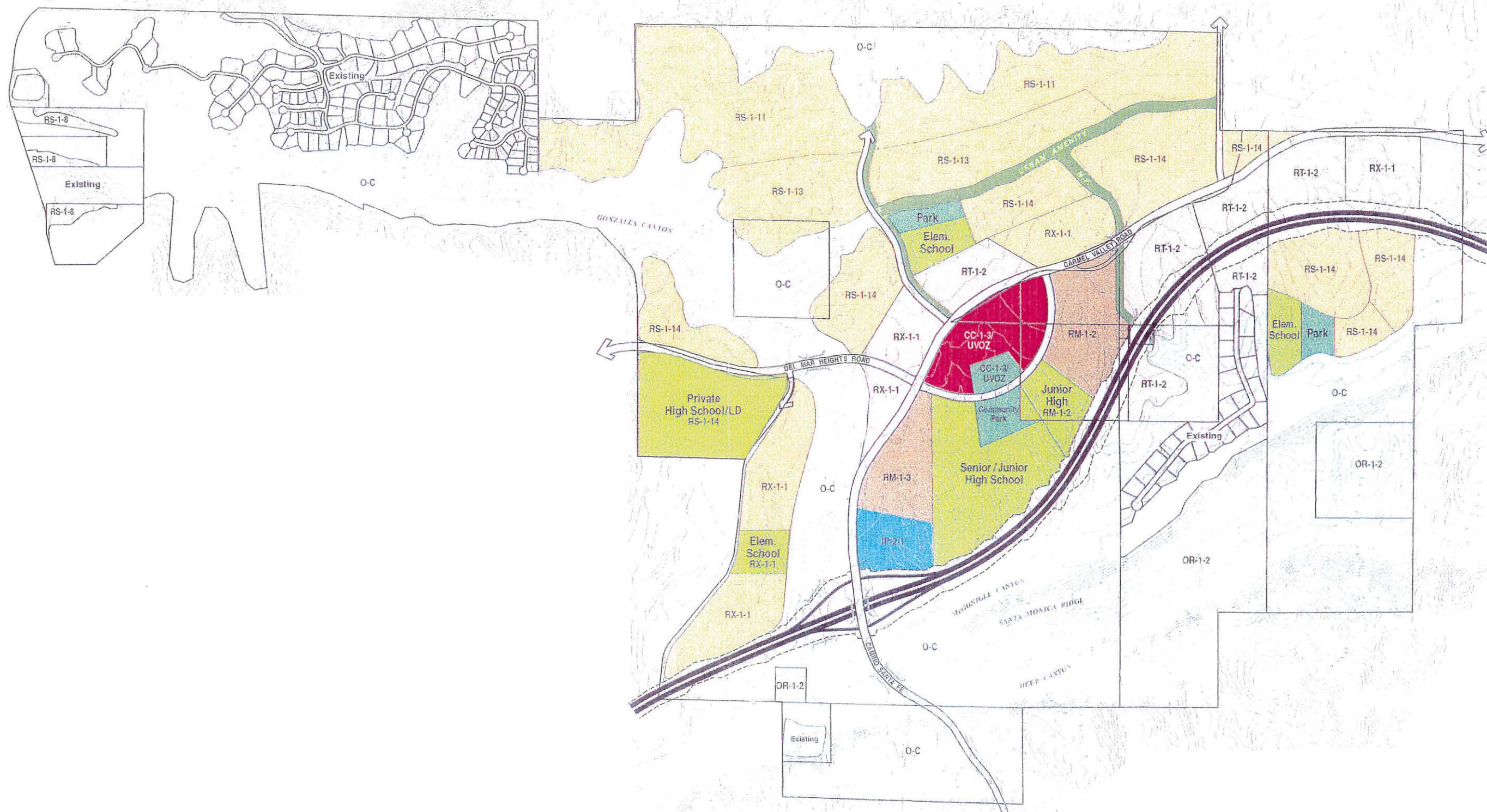


FIGURE 3-21

Master Rezoning Subarea
Plan 2



Map Source: Latitude 33 Planing and Engineering 1998

FIGURE 3-20

Master Rezoning Subarea
Plan 1

adjustment. In addition, Third Party Beneficiary Status would be conferred to allow development in sensitive resources.

The boundary adjustment components include the conveyance of high-quality habitat in Carmel Valley Neighborhood 8A and Subarea V (Deer Canyon and Lorenz Parcel) by Pardee to the City, and an adjustment of the MHPA line to increase the size of the preserve within the Neighborhood 8A area. The MHPA would also be adjusted to delete largely disturbed habitat from the Pacific Highlands Ranch Subarea and Carmel Valley Neighborhood 10. The effect of these revisions to the MHPA would be to increase the preservation of very rare Tier I resources while allowing development on less sensitive disturbed and natural areas within Pacific Highlands Ranch and Neighborhood 10. Thus, the proposed MHPA boundary adjustment under the proposed subarea plan is considered equivalent^{superior} in biological value to the adopted MHPA. No further action by the City or wildlife agencies is required.

At Carmel Valley Neighborhood 8A (Parcels A and B), approximately 150 acres would be conveyed by Pardee, of which 55 acres of Tier I habitat would be added to the MHPA. An additional 20 acres within Parcel A may be added to the MHPA in the future should the City decide not to use this acreage for school/park uses. The addition of these lands to the MHPA would greatly increase the size of the habitat block planned for this particular geographic area, improving the overall preserve design and configuration, and providing greater assurances that scarce vegetation types (i.e., southern maritime chaparral) would be maintained over the long term.

North City Local Coastal Program (LCP) Amendment: The portion of Pacific Highlands Ranch within the coastal zone is under the jurisdiction of the California Coastal Commission. An amendment to the adopted LCP would be required to bring the LCP land use plan into conformance with the adopted subarea plan.

Development Agreement~~Future Discretionary Actions:~~ A Development Agreement is contemplated is proposed which includes the components described above for the MHPA boundary adjustment. In addition to the boundary adjustment components, the ~~contemplated~~ Development Agreement would include the following:

- In order to implement the above-described MHPA boundary adjustments, revisions to the Carmel Valley Neighborhood 10 Precise Plan would be necessary. These revisions include an expansion of residential development (22 single-family units) on approximately 81 acres (see Figure 3-6) in to the MHPA (Precise Plan Unit 10) and an increase in the number of multi-family units from 98 to 250 (Precise Plan Unit 10). The revisions to the Neighborhood 10 Precise Plan, tentative maps, and rezonings would be implemented subsequently by City Council action.

- Transfer of an additional 6 dwelling units in Subarea V from the Deer Canyon Parcel (approximately 60 acres) to the Lorenz Parcel (approximately 78 acres). This will allow construction of 46 dwelling units on the Lorenz Parcel.
- Transfer of title to the Deer Canyon Parcel to the United States Government or an agency thereof as may be directed by the City of San Diego.
- Establishment and approval by the City and wildlife agencies of a 2024-acre mitigation land bank on Parcel A in Neighborhood 8A within Carmel Valley Community Planning Area.
- Establishment and approval by the City and wildlife agencies of a 100- to 130-acre mitigation land bank in Subarea III of the NCFUA.
- Transfer of title to Parcel A and B within Neighborhood 8A of Carmel Valley to the City by Pardee, exclusive of those areas utilized for the 2024-acre mitigation land bank.
- Pardee will convey to the City MHPA land within Subarea III exclusive of the area utilized for the mitigation land bank in Subarea III.
- With a successful phase shift vote, Pardee will agree to reduce the development within the mesa top portion of the Carmel Valley Neighborhood 8C Precise Plan.

Other Discretionary Permits: Responsible and trustee agencies may include the U.S. Fish and Wildlife Service (USFWS) and the California Department of Fish and Game (CDFG). Because the coastal California gnatcatcher is listed as a threatened species, authorization by the USFWS and CDFG is required prior to any “take” of coastal sage scrub. The City of San Diego has the authority to issue authorizations for “take” of the California gnatcatcher pursuant to the federal Endangered Species Act, and Section 2835 of the California Endangered Species Act. Development of the project site as proposed may require placement of fill within wetlands which would require a permit from the U.S. Army Corps of Engineers pursuant to Section 404 of the Clean Water Act. In addition, alteration of streambeds by project grading may require a 1601/1603 agreement from the CDFG.

Chapter Four

Environmental Analysis

A. Land Use

Existing Conditions

a) Existing and Surrounding Land Use Characteristics

Pacific Highlands Ranch contains 2,652 acres. Until now, this area has been known as Subarea III of the NCFUA. As shown in Figure 2-2, much of Pacific Highlands Ranch is currently used for nursery operations, commercial agriculture, large-lot single-family residences, and equestrian activities. The nursery operations are mainly located along Black Mountain Road and grow flowers, palms, and other plants for landscaping purposes. The main agricultural commodity in the project area is pole tomatoes. Most of the tomato farming takes place on the upland mesas north of Gonzales Canyon. Equestrian activities take place on two horse ranches located on the western end of Gonzales Canyon and in the southeastern corner of the project area. There are 10 existing single-family residences within the project area as well as the 29-unit Rancho Glens Estates subdivision along Caminito Mendiola in the eastern portion of the site. Most of the remaining area in the southeastern portion of the site is currently undeveloped open space, with the exception of two small salvage yards that are being operated in this area.

In the western portion of Pacific Highlands Ranch is the 389-acre Del Mar Highlands Estates project site. In April 1997, a proposal to develop a 172-unit clustered PRD was approved by the City Council. Also, a CUP (five acres) was approved for a pet care facility in 1995 in Carmel Valley at the southern boundary of the subarea.

Surrounding land uses to the north and west include estate residential development in Fairbanks Ranch, Del Mar Country Club, equestrian uses, plant nurseries, and residential development in the Carmel Valley community. Immediately east and south of the project site are open space areas of Subareas IV and V, respectively, of the NCFUA. An

approved and partially built project in the County of San Diego, The Lakes, exists adjacent to the northeastern boundary.

b) Existing Land Uses Designations, Plans, and Policies

The majority of Pacific Highlands Ranch is designated in the City's Progress Guide and General Plan (City of San Diego 1985) as an area for future growth. Future Urbanizing areas contain "land which is presently vacant and for the most part zoned for agriculture. This land is to be held as an 'urban reserve', and will be released for development as the planned communities are built out or as opportunities to implement the balanced housing or land use goals of the City arise" (City of San Diego 1979:17). The Guidelines for Future Development section of the General Plan states, "the designation of land in this category is not permanent, it is an interim or urban reserve designation. Its purpose is to preclude premature development and to guide urbanization" (City of San Diego 1979:24). Adoption of the Framework Plan for the North City Future Urbanizing Area in October 1992 amended the General Plan circulation and open space designations for the area. Figure 4A-1 illustrates the land use designations within the Framework Plan on Pacific Highlands Ranch and the surrounding area.

The majority of Pacific Highlands Ranch is zoned A-1-10, which allows for limited development or improvement, with structures allowed only for residences, churches, utility substations, or structures associated with agricultural pursuits, such as stables or stands for the sale of agricultural crops produced on the premises. One dwelling unit per 10 acres is allowed in the zone, with a 10-acre minimum lot size, except under PRD clustering. Pursuant to the City Zoning Ordinance, a "rural cluster" development can also occur which preserves the remainder of the property in an undeveloped state until development at urban densities is appropriate. This provision is augmented by City Council Policy 600-29, which specifically applies to PRD clustering within the Future Urbanizing area at a maximum density of one dwelling per four acres.

Figure 4A-2 illustrates the planning areas adjacent to the project site. Lands to the north and west of Pacific Highlands Ranch are developed or in the process of developing. Pacific Highlands Ranch is bordered by other primarily undeveloped subareas of the NCFUA on the east and south. Subarea IV is immediately to the east and Subarea V is directly to the south. The existing community of Fairbanks Ranch forms the subarea's northern border, while Carmel Valley (formerly North City West) constitutes the western boundary. These communities and their plans are summarized below.

Fairbanks Ranch

The community of Fairbanks Ranch, along with the Del Mar Country Club, exists along much of the northern border of Pacific Highlands Ranch in the county of San Diego. The

Legend for Figure 4A-1

Compact Community Uses



Mixed Use Community Core
retail and service
office
public and semi-public uses
residential
32 du/gross acre average
(with density bonus, up to 40 du/gross acre)



Core Residential
11 du/gross acre average
(with density bonus, up to 14 du/gross acre)



Peripheral Residential
7 du/gross acre average
(with density bonus, up to 8.7 du/gross acre)



Low Density Residential
4 du/gross acre average
(with density bonus, up to 5.2 du/gross acre)



Moderately Low Density Residential
1.6 du/gross acre average
(with density bonus, up to 2 du/gross acre)



Very Low Density Residential
.8 du/gross acre average
(with density bonus, up to 1 du/gross acre)



Estate Residential
.2 du/gross acre average
(with density bonus, up to .25 du/gross acre)



Local Mixed Use Center
local-serving retail
public and semi-public uses
residential
14 du/gross acre average
(with density bonus, up to 17.2 du/gross acre)



Employment Center



Service Commercial



Environmental Tier

Circulation Network



Major Roadway
(Generalized Alignment)



Freeway



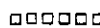
Proposed Freeway



Interchange



Transit Emphasis



**Transit Exclusive
Right-of-Way**



High School



**Junior High/
Middle School**



Community Park



City Operations Station



NCFUA Boundary



Subarea Boundaries



Retail Center
(outside NCFUA)



Major Employment Center
(outside NCFUA)



Regional Transit Terminal

Source: North City Future Urbanizing Area Framework
Plan, City of San Diego 1992

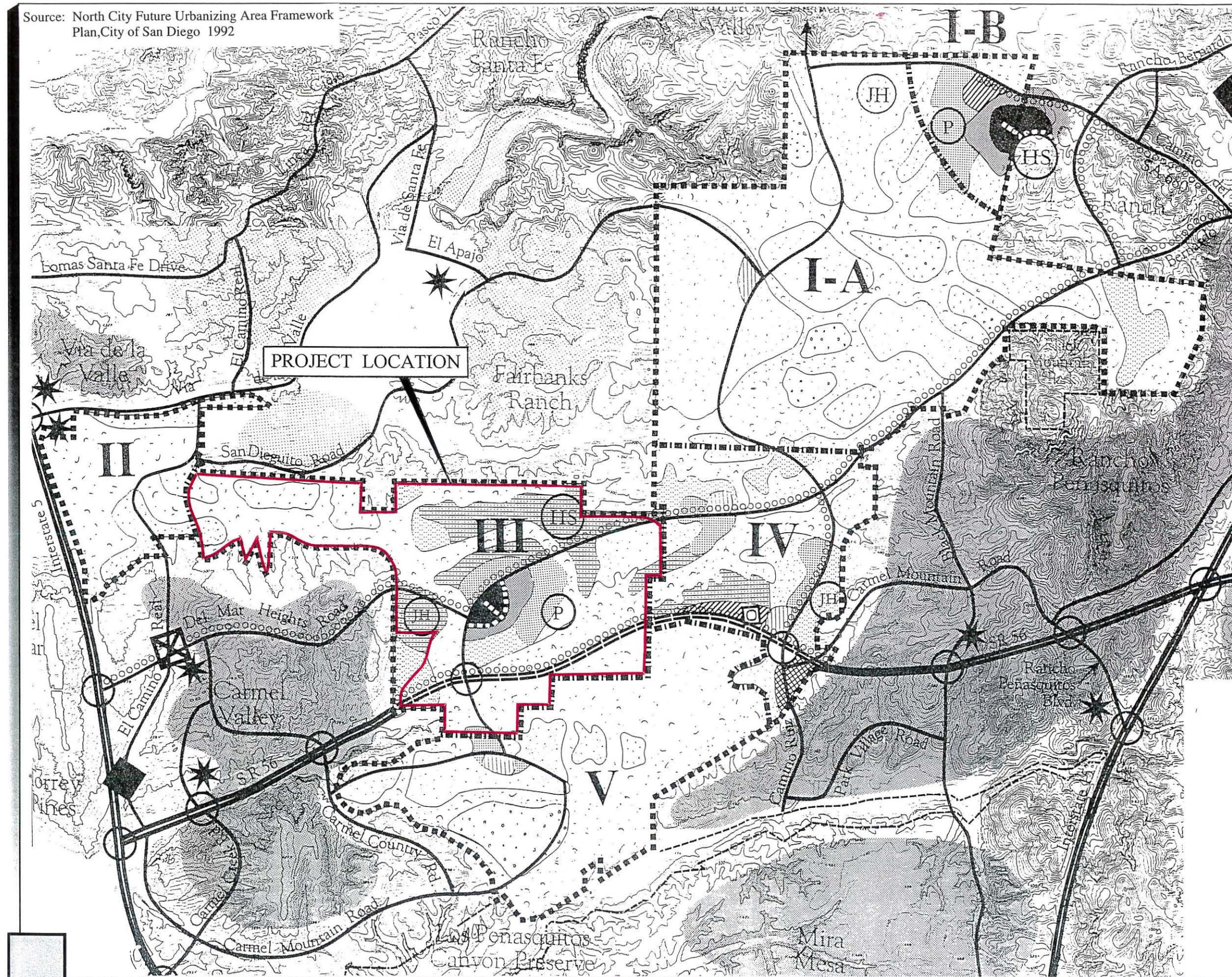
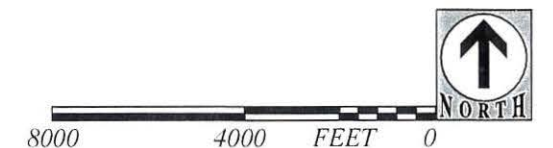
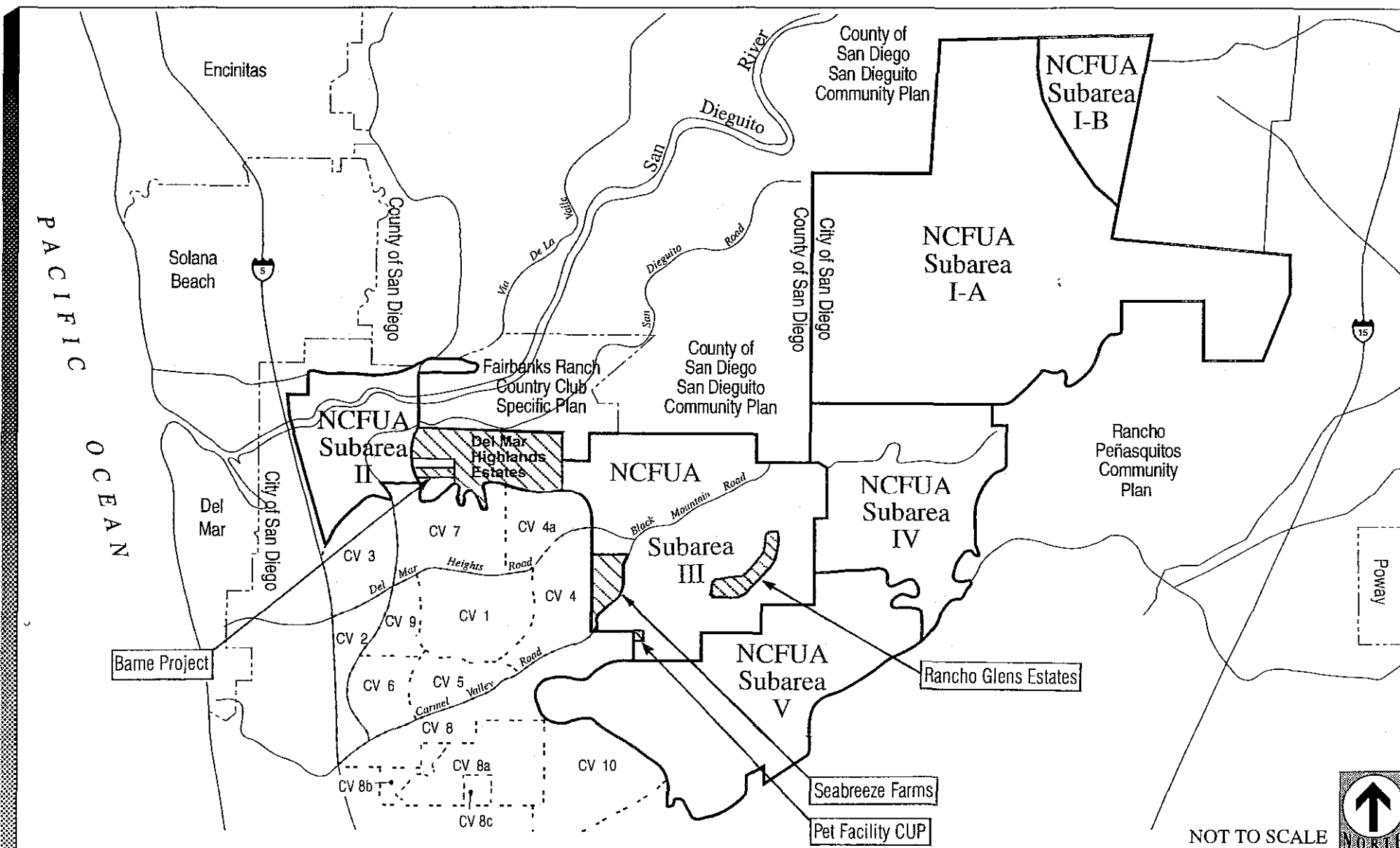


FIGURE 4A-1
Framework Plan
Land Uses





Source: Helix Environmental Planning from City of San Diego 1995

CV Carmel Valley Community Neighborhood

NCFUA North City Future Urbanizing Area

FIGURE 4A-2
Surrounding Community
and Specific Planning Areas

bulk of the land is designated as open space, with the remaining land developed and being developed with estate single-family residences and the golf course.

Carmel Valley Community Planning Areas

The Carmel Valley Community Plan (formerly known as the North City West Community Plan), adopted in 1975, calls for the phased orderly development of approximately 4,285 acres of land with commercial, residential, industrial, and public facility land uses. The community plan identifies 9 development units, or neighborhoods, each of which requires the adoption of a precise plan consistent with the community plan prior to development. Since the adoption of the community plan, several of the neighborhoods were split, creating 13 neighborhoods shown on Figure 4A-2. Eleven of the 13 neighborhoods have adopted precise plans. The remaining two are Neighborhood 8A and 8B. The recently approved Neighborhood 8C Precise Plan and VTM represents a new precise planning area which was formerly within Neighborhood 8A. As shown on Figure 4A-2, Neighborhoods 4 and 4A border Pacific Highlands Ranch on the west.

Seabreeze Farms Estates

This 72-acre property is located in the southwestern portion of Pacific Highlands Ranch; however, in November 1996, voters approved a phase shift to remove the project site from the Future Urbanizing area. This approved residential project includes 255 units, an eight-acre equestrian center, and approximately 35 percent of the property dedicated to open space.

Subarea II

Subarea II lies to the northwest of Pacific Highlands Ranch within the NCFUA. This subarea is not being planned at the current time. Pursuant to the Framework Plan, this area is designated for a total of 230 single-family detached dwelling units. There are no other designated land uses except for open space.

Subarea IV (Torrey Highlands)

Subarea IV is comprised of 1,522 acres located in the eastern portion of the NCFUA. It stretches from the upper reaches of La Zanja Canyon in the northwestern portion of the subarea to Deer Canyon, which extends east to west along the southern boundary of the subarea. McGonigle Canyon bisects the property in a southwesterly direction. Subarea IV lies between Pacific Highlands Ranch and the Rancho Peñasquitos Community Plan area, with Subarea V to south and Subarea I to the north. The Subarea Plan was approved in 1996 for a maximum of ~~2,850~~ 2,600 dwelling units with densities ranging from one dwelling unit per acre to 10 to 20 dwelling units per acre with the local mixed use centers in the subarea.

Subarea V (Del Mar Mesa)

Subarea V is located in the western portion of the NCFUA, east of El Camino Real and Carmel Valley, south of McGonigle Canyon and north of Los Peñasquitos Canyon Preserve. Currently, there are existing low-density residences located in parts of Subarea V. In June 1996, the City Council adopted the Del Mar Mesa (Subarea V) Specific Plan, which provides for the future development of up to 685 dwelling units and significant open space system on approximately 2,042 acres in the plan area.

c) City of San Diego Progress Guide and General Plan

The General Plan has a number of environmental goals that are pertinent to Pacific Highlands Ranch. These include:

Conservation

- Wise management and utilization of the City's remaining land resources, and preservation of its unique landforms and the character they impart to San Diego.
- Retention of premium agriculturally productive lands in agricultural usage.

Open Space

Establishment of 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.

Guidelines for Future Development

Preservation of environmental quality by preservation of open space and vistas and by reduction of air, noise, and water pollution.

d) City of San Diego Planning and Development Policies

Development within the Future Urbanizing area is guided by several City planning and development policies. The NCFUA Framework Plan identifies specific policies for land use, urban design, and open space (including the Environmental Tier) development in the NCFUA. City Council Policies 600-10, 600-29, 600-30, 600-40, and the Resource Protection Ordinance also apply to the subarea. These policies are discussed below.

NCFUA Framework Plan Policies

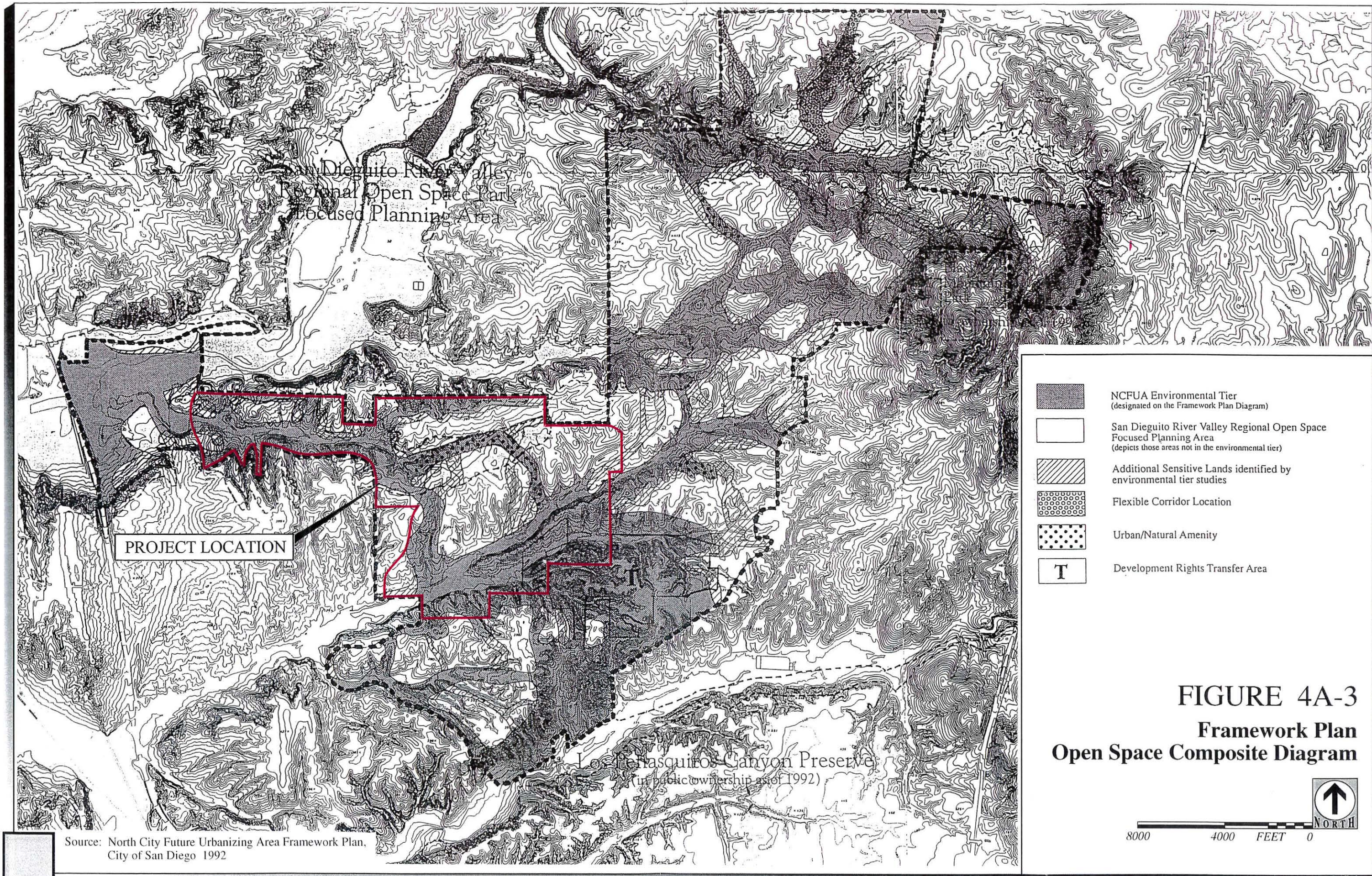
The North City Future Urbanizing Area Framework Plan dated October 1992 amended the Progress Guide and General Plan and contains development policies for six topics: land use, urban design, open space, transportation, affordable housing, and public

facilities and financing. The Framework Plan sets forth “Guiding Principles” and “Implementing Principles” for these topics.

Future land uses and transportation corridors in the NCFUA are depicted on the Framework Plan diagram (see Figure 4A-1). The Framework Plan includes text and tables that define the legend categories in greater detail and show the distribution of land use by acre for each of the subareas. The Framework Plan also provides a composite diagram showing the Environmental Tier and other open space information (Figure 4A-3).

The land use chapter of the Framework Plan contains eight Guiding Principles for Land Use. These include:

- Create a pattern of land use and conservation that is clearly distinguishable from surrounding communities that fosters appealing and enjoyable neighborhoods and business districts.
- Incorporate into the NCFUA a permanent Environmental Tier of open space lands with high natural resource value that function as natural habitat, form connections to surrounding open spaces, and give shape and definition to surrounding built areas. Use natural resources as a foundation for designing the area’s land use plan.
- Concentrate residential development in specific areas to create compact neighborhoods that have an urban character and that include varied types of housing and a range of affordability supported by a mix of shops, services, employment, and public activities that can be reached by foot, bicycle, and transit.
- Designate employment centers in locations that are near shops, services, housing, and transportation.
- Integrate facilities for non-automobile travel into the NCFUA transportation system, and support alternatives to automobile use through land use and urban design principles.
- Limit adverse impacts on surrounding communities by providing needed public facilities within the NCFUA, coordinating planning with surrounding areas, and restricting land use intensity to avoid severe traffic impacts in neighboring communities.
- Include in the NCFUA public facilities that will be needed by area residents, in order to meet their needs, to provide for convenience and community identity within the NCFUA, and to minimize impacts on services outside of the NCFUA.






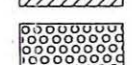
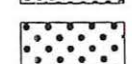
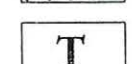
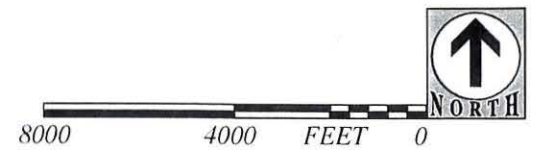
-  NCFUA Environmental Tier
(designated on the Framework Plan Diagram)
-  San Dieguito River Valley Regional Open Space
Focused Planning Area
(depicts those areas not in the environmental tier)
-  Additional Sensitive Lands identified by
environmental tier studies
-  Flexible Corridor Location
-  Urban/Natural Amenity
-  Development Rights Transfer Area

FIGURE 4A-3
Framework Plan
Open Space Composite Diagram



Source: North City Future Urbanizing Area Framework Plan,
City of San Diego 1992

- Implement Framework Plan principles through preparation of a series of subarea plans that conform to the Framework Plan, provide needed detailed studies, and are coordinated with other planning efforts undertaken by the City, San Diego County, San Diego Association of Governments, and other public agencies.

The Guiding Principles for Urban Design include:

- Two compact communities should be developed in designated areas with densities that promote pedestrian activity and transit use. The compact communities must have a relatively dense, urban character that emphasizes mixed-use development, residences within walking distance of shops and transit, and accessible public places. This pattern will be an alternative to uniform low density suburban development that creates monolithic communities and consumes large land areas.
- The mixed use community core should be designed to create high-quality pedestrian environments with building densities sufficient to support walkable shopping districts.
- The core residential areas should contain a mix of housing types within walking distance of the community core. The planning and design of all development in these neighborhoods must create a high-quality pedestrian environment with a horizontal mixed-use pattern of small project and parcel sizes.
- Peripheral residential areas should contain a mix of duplex, triplex, and attached townhouses integrated with single-family detached units to achieve a diversity of house types and affordability. The peripheral residential areas should have direct pedestrian and bicycle linkages to the community core. Normally, peripheral residential areas should be within one mile of the community core.
- Local mixed-use centers should follow the same design principles for access, streetscapes, building frontages, pedestrian emphasis, mixed-use development, and parking as the mixed-use community cores.
- The many canyon and valley views are primarily local, short-range views that can be seen from existing public roads, public open spaces, and private lands. The location of the freeway, streets, and roads throughout the study area will effectively “open up” an extensive network of public view corridors.

The Guiding Principles for Open Space include the following:

- Create the Environmental Tier, an interconnected, viable system of natural open space that serves to protect and conserve cultural resources, flora, and fauna that occur in the NCFUA.

- Conserve biological diversity by setting aside relatively large areas of natural open space/habitat, linked with corridors and protected from human activities detrimental to this purpose.
- Preserve floodplains and significant topographic features such as canyons, ridges, and hillsides.
- Promote subarea- and project-level planning that preserves as open space significant natural features within development areas.
- Provide for refinement of the Environmental Tier as shown on the Framework Plan diagram based on field assessment of resources and detailed land use planning.
- Within the Environmental Tier, provide for some low-impact forms of recreation such as walking, bicycling, and nature watching.

In addition to these guiding principles, the NCFUA Framework Plan specifies a number of implementing principles for each of these topics.

City Council Policy 600-10, “Adequacy of Public Services in Connection with Development Proposals”

This policy addresses the timing of the provision of public services for new developments to insure that services are available concurrently with need. It requires that:

- New development be consistent with a master development plan for the general area which has been reviewed by the Planning Commission and adopted by the Council;
- The development includes an implementation section which sets forth in detail measures which will be taken to insure that needed public services are provided concurrent with need in the development; and
- The proponent presents evidence satisfactory to the appropriate body or agency that the required public services will in fact be provided concurrent with need.

City Council Policy 600-29, “Maintenance of Future Urbanizing Area as an Urban Reserve”

This council policy states that the City’s objectives in land use decision-making in the Future Urbanizing area are “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 development.”

Policy 600-29 presents options for limited development in the Future Urbanizing Area. These include:

- Development pursuant to the A-1 zoning regulations, at the density and minimum lot size permitted in the applicable zone.
- 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; to allow development in patterns more consistent with that occurring in adjacent areas; to avoid fragmentation of land ownership patterns which would mitigate against future development opportunities; to allow for reasonable development opportunities during the planning period without foreclosing future development choices; and to make annexation of unincorporated land more attractive where such lands will be brought into the Future Urbanizing area.
- 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.
- Development pursuant to the Conditional Use Permit regulations, provided that the conditional uses are natural resource-dependent, 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.

City Council Policy 600-30, “General Plan Amendments to Shift Land from Future Urbanizing to Planned Urbanizing Area”

This council policy was amended following the passage of Proposition A in 1985. Proposition A was a voter-passed initiative which requires that projects located in the Future Urbanizing area which propose a shift to the Planned Urbanizing area require a majority approval vote of the people at a city-wide election. The council policy applies to all shifts of land from Future Urbanizing to Planned Urbanizing prior to a General Plan Amendment. The policy states that no land shall be shifted from Future Urbanizing to Planned Urbanizing except by a General Plan Amendment approved by the City Council and a majority approval vote at a city-wide election. Once land is shifted, a rezone or subsequent development approval shall be in accordance with applicable requirements. Finally, a General Plan Amendment to shift land may be initiated by the City on its own motion or by a property owner.

City Council Policy 600-40, "Preparation of Long Range Plans"

Council Policy 600-40 was created in order to ensure that the preparation and adoption of long-range plans for the city include a thorough analysis of the constraints and opportunities of the planning area, including but not limited to the resources protected by the Resource Protection Ordinance (City of San Diego 1991). In addition to ensuring a thorough analysis of the site at an early stage in the planning process, the purpose of 600-40 is to (1) aid in the review of permits and maps in the planning area, (2) ensure protection of environmental resources by preserving contiguous open space systems and providing mechanisms to acquire or protect these resources, and (3) ensure that adopted land use policies and objectives are considered in the context of the suitability of the plan area for development (City of San Diego 1991).

According to Council Policy 600-40, a development suitability analysis is to be conducted for all long-range plans, such as the Pacific Highlands Ranch Plan, to ensure that environmental resources and other site constraints and opportunities are fully considered in preparation of the plan. This policy goes on to state that "Development, including land uses, roads, and other facilities, shall be distributed so as to minimize encroachment into hillsides, biologically sensitive lands, significant prehistoric and historic resources and other resources addressed in RPO. Mechanisms to protect these resources must be addressed in the long-range plans in sufficient detail to adequately evaluate future applications for permits and maps in the planning area, and to ensure reasonable use of land or appropriate compensation for all property owners." It is the City's objective that substantial acreages of habitat be preserved by implementing the long-range plan which could not be achieved if the property was developed on a parcel-by-parcel basis.

Council Policy 600-40 also requires that the City Manager's recommendation on the draft precise plan be based upon the site suitability analysis, which enables the decision maker to determine the consistency of the plan with RPO and other adopted General Plan and City Council policies and objectives. If future projects or permit applications within the precise plan area are found to be consistent with the precise plan, future RPO permits may be approved using the "Substantial Conformance" provision in the alternative compliance process contained in RPO. If a long-range plan is found not to be consistent with RPO, then an alternative concept plan shall also be presented to the decision maker which would be consistent.

Resource Protection Ordinance

As noted above, Pacific Highlands Ranch is subject to the regulations of the City of San Diego's Resource Protection Ordinance, adopted in 1989 and most recently revised in January 1998. The purpose and intent of this ordinance is "to protect, preserve, and, where damaged, to restore the environmentally sensitive lands of San Diego, which includes wetlands, wetland buffers, floodplains, hillsides, biologically sensitive lands, and

significant prehistoric and historic resources.” The provisions of the ordinance are applicable to floodways and 100-year floodplain fringe areas, all wetland and wetland buffer areas, all hillside areas of 25 percent or greater as defined by the Hillside Review Overlay Zone, all biologically sensitive lands, and all significant prehistoric and historic sites and resources. RPO requirements in these areas follow:

Wetlands. Permitted uses in wetlands are limited to wetlands related scientific research, wetlands related educational uses, and essential public service projects, where it has been determined that there is no feasible less environmentally damaging location or alternative and where mitigation measures have been provided were added as permitted uses.

Wetland Buffer Areas. A 100-foot-wide wetland buffer shall be maintained unless it is demonstrated that a buffer of lesser width will protect the wetland resources. Permitted uses in the buffer areas are all uses permitted in wetlands, passive recreational uses, access paths, public viewpoints, and improvements necessary to protect adjacent wetlands. These uses are permitted provided such uses are compatible with protecting wetlands and do not harm the natural ecosystem.

Floodways. Permitted uses in floodway areas are those uses allowed by the floodway zone subject to the ordinance, General Plan Circulation Element or new community plan roadways, channelization for necessary water supply projects, flood control projects, and improvement of fish and wildlife habitat.

Floodplain Fringe. Permitted uses in the floodplain fringe are those uses allowed by the underlying zone subject to the ordinance, new community plan or General Plan Circulation Element roadways, low-intensity recreational uses, sand and gravel extraction (subject to a conditional use permit), and permanent structures and/or fill under certain conditions.

Hillsides and Biologically Sensitive Lands. Hillsides encompassing slopes of 25 percent gradient or more and with an elevation differential of 50 feet or more are considered sensitive under the ordinance. Native biological communities or any vegetative community supporting state or federally listed or candidate species are considered sensitive, along with designated plant or wildlife species.

A minimal encroachment is allowed into hillsides and biologically sensitive lands, per formulas provided in the ordinance. The encroachment is not to adversely impact state or federally listed rare, threatened, or endangered species or wetlands. RPO combines the allowed encroachment for hillsides and biological resources, based on the proportion of each resource, to set the encroachment allowance. Development beyond the encroachment allowance for biologically sensitive lands shall not be permitted unless all feasible mitigation to protect and preserve these lands is required as a condition of approval. Exceptions to the encroachment allowance may be considered for community

plan and General Plan Circulation Element roads, local public streets, public utility systems, some public facilities, brush management for fire protection, and some sand and gravel operations.

Significant Prehistoric and Historic Resources. Although significant prehistoric and historic resources are defined under CEQA and must be addressed as significant resources, RPO further distinguishes sites of outstanding scientific, heritage, or religious significance. Permitted uses are those allowed by the underlying zone subject to RPO. Development is not permitted in significant prehistoric or historic sites or resources.

e) San Dieguito River and MSCP Planning Documents

San Dieguito River Regional Plan

This plan was adopted by the City Council in October, 1984. The plan is intended to serve as a comprehensive planning framework for the San Dieguito River basin and combined the planning documents and policies of many jurisdictions and agencies with responsibilities and interest in the river basin. Generally, the plan's goals are to preserve the open space character, significant water resources, and landscape that make the San Dieguito River basin unique, as well as the various natural, cultural, and aesthetic resources in the basin. The following are major goals of the regional plan:

- To preserve the function of the San Dieguito River basin as an open space corridor through the protection of the contiguous nature of the existing dominant landscape features.
- To protect and preserve significant natural, cultural, and aesthetic resources, including the visual integrity of the river basin.
- To ensure compatibility between various land uses.
- To preserve water quality and quantity.

From the above goals, the following is a summary of the relevant general recommendations which were established:

- Preservation of the San Dieguito River basin's recreation/open space potential should be the highest priority in considering land use issues.
- Establishment of a recreation/open space corridor through the river basin. This corridor would extend from the coast, inland to Sutherland Reservoir. As a first step in establishing a recreation/open space corridor, emphasize existing and proposed recreation programs and plans.

- Promotion of alternate modes of transportation within the recreation corridor to minimize vehicular impacts upon the recreational potential.

The San Dieguito River Regional Plan is intended to be a generalized plan. It identifies the need for more detailed planning to occur in the form of area, community, or specific plans. The plan addresses the entire river valley from the Pacific Ocean northeasterly to Sutherland Reservoir. It divides the valley into six subareas for planning purposes. The Regional Park Plan recommends rural residential development (less than 1 dwelling unit per acre), agriculture, and recreational/open space uses for those areas immediately adjacent to Pacific Highlands Ranch.

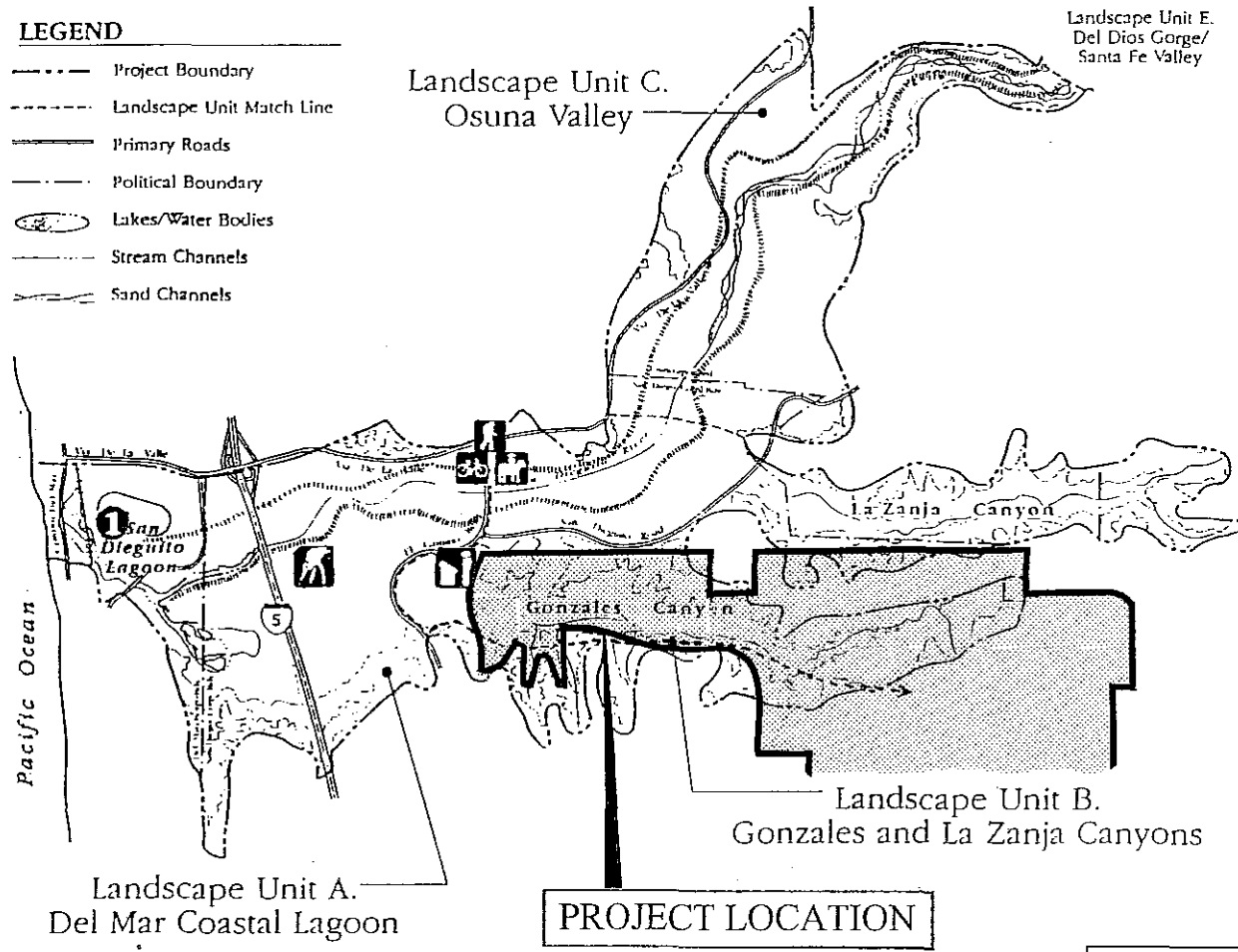
San Dieguito River Valley Regional Open Space Park Concept Plan

In June 1989, the San Dieguito River Valley Regional Open Space Park Joint Powers Authority (JPA) was established for the primary purpose of planning and acquiring a greenbelt and park system within the San Dieguito River valley. The JPA has been empowered by its member agencies (County of San Diego and the Cities of Del Mar, Escondido, Poway, San Diego, and Solana Beach) to acquire, hold, and dispose of property for park purposes and to plan, design, improve, operate, manage, and maintain the San Dieguito River Valley Regional Open Space Park. Thus, the planning process which began with the City's San Dieguito River Regional Plan is continuing under the jurisdiction of the JPA. The JPA is further empowered to establish guidelines for and advise public agencies on appropriate land uses within the San Dieguito River Park. In order to accomplish these objectives, the JPA mapped an 80,000-acre Focused Planning Area (FPA) for the San Dieguito River Park and adopted a concept plan for the FPA on February 18, 1994. The purpose of the concept plan is to set forth the vision, goals, and objectives of the park, as well as to establish the overall planning framework for future park development within the FPA. The JPA itself does not have land use authority over the properties within the FPA. Significant elements of the San Dieguito River Park Concept Plan were incorporated into the San Pasqual Valley Plan, which was adopted by the San Diego City Council in 1995. In addition, the Park's goals and objectives are incorporated into the Land Use, Urban Design, Open Space, and Transportation chapters of the Framework Plan, and the City of San Diego has not yet incorporated any part of the concept plan into City planning documents, although several Framework Plan policies address the park.

The FPA extends for 55 miles from the river's source on Volcan Mountain near Julian to the ocean at Del Mar. It contains both private and publicly owned lands and roughly corresponds to the viewshed of the San Dieguito River valley and its major tributary canyons. This river system forms a natural corridor, connecting a wide variety of native environments and vegetation types. Figure 4A-4 shows the boundaries of the FPA within the project area. As shown, almost all of the approved Del Mar Highlands Estates project (the western portion of Pacific Highlands Ranch) is included in the FPA. The FPA

LEGEND

- Project Boundary
- - - Landscape Unit Match Line
- Primary Roads
- - - Political Boundary
- Lakes/Water Bodies
- Stream Channels
- Sand Channels



Source: San Dieguito River Park Joint Powers Authority 1994

- San Dieguito Lagoon Enhancement Area
- Interpretive Center
- Sikes Adobe Restoration
- Campground
- Coast to Crest Trail Corridor Hiking, Bicycling & Equestrian
- Secondary Trails
- Vista Point

① San Diego County Fair Grounds

FIGURE 4A-4
San Dieguito River Valley
Regional Open Space Park Concept Plan

continues along Gonzales Canyon, the San Dieguito River valley, and La Zanja Canyon (see Figure 4A-4). Gonzales and La Zanja Canyons are identified by the concept plan as important wildlife habitat links and open space trail connections to Carmel Valley. The plan states that special attention should be given to viewsheds of specific activity areas, although buffering of development with trees would be appropriate where compatible with wildlife habitat.

The vision of the concept plan is “to create an open space park within the 55-mile-long San Dieguito River valley that will protect the valley’s unique resources, while providing compatible recreational opportunities for the San Diego region.” The stated overall goal of the concept plan is to “preserve land within the FPA of the San Dieguito River Park as a regional open space greenway and park system that protects the natural waterways and the natural and cultural resources; provides compatible recreational opportunities that do not damage sensitive lands; and provides a continuous and coordinated system of preserved lands with a connecting corridor of walking, equestrian, and bicycle trails encompassing the San Dieguito River valley from the ocean to the river’s source and beyond.” The general objectives for the park, as stated in the concept plan, are as follows:

- Preservation of open space
- Conservation of sensitive resources
- Protection of water resources
- Preservation of the natural floodplain
- Retention of agricultural uses
- Creation of recreational and educational opportunities
- Establishment of design guidelines

The concept plan divides the FPA into landscape units based on the differing physical characteristics of each unit. The preparation of master plans for each landscape unit is encouraged. Pacific Highlands Ranch is within Landscape Unit B. The concept plan acknowledges that much of the natural habitat within this landscape unit has been disturbed by existing land uses. However, the finger canyons between Gonzales and La Zanja Canyons and the San Dieguito River are identified as important wildlife links and open space trail connections. The mesas and upland slopes of these drainages are identified as “a very important frame to the view of the valley as it narrows.” Within Landscape Unit B, the concept plan calls for:

- Dedication of open space corridors within Gonzales and La Zanja Canyons in conjunction with development. These corridors should be of adequate size to accommodate both wildlife and human movement. Existing sensitive habitat in these corridors should be preserved and, where necessary, native habitats should be restored.

- Setback of development on the adjacent ridges from the top of slope in order to reduce its visibility from the river valley and canyons, as well as to provide for an upland transition area that will serve to buffer the development from the adjoining natural habitat. Architectural treatment should be sensitive to the views from the park, and appropriate landscaping should be provided within a transition buffer area to help screen the development.
- Construction of canyon overlooks or viewpoints within future development proposals that will provide visual access to interested park visitors.
- Maintenance and improvement of the equestrian facilities within this landscape unit.
- Sensitive siting of trails intended for hiking and equestrian use that connect to the regional trail systems in Los Peñasquitos Canyon Preserve, Black Mountain Park, and Carmel Valley. Existing trails and dirt roads should be utilized wherever feasible.
- Provision of a small trail staging area within this landscape unit for parking and access to the proposed trail system.
- Development of a park headquarters in Landscape Unit A or B that, in addition to administration, could serve as a park information and visitor's center, provide ranger housing and a central location for docent and volunteer programs, and provide a base for scientific research and educational programs on coastal wetlands.

The concept plan also lists implementing principles for development adjacent to the San Dieguito River Park FPA. These principles call for minimizing alteration of drainage ways and landforms, conforming development in hillside areas to the natural setting, preserving significant native vegetation, and clustering units where appropriate to minimize intrusion into sensitive habitat areas. Additional principles encourage blending of development with the hillside background and topography, preservation of public views, restoration of disturbed open space areas, minimal grading, setbacks from ridges and bluffs, use of landscaping as screening, use of shielded low-sodium exterior lighting, and variation of rooflines. On May 19, 1995, the JPA adopted a Private Property Rights Protection Policy which reiterates that the JPA does not have land use authority and states that the JPA respects private property rights and will not recommend or participate in hostile condemnation of private property for park purposes. It further states that the right to review and comment on private development proposals is in an advisory capacity only.

Multiple Species Conservation Program

In 1991 the City of San Diego and other land use jurisdictions in southwestern San Diego County began development of the Multiple Species Conservation Program to meet the Metropolitan Wastewater Department's need to mitigate the direct biological impacts

associated with mandated improvements to the region's sewage treatment facilities. The MSCP effort was also directed toward mitigating the secondary biological impacts associated with projected growth in the region.

The MSCP is designed to identify lands that would conserve habitat for federal and state endangered, threatened, or sensitive species, including the federally listed threatened California gnatcatcher. The MSCP has been found to be the equivalent of a Natural Community Conservation Plan for the area, consistent with the federal Endangered Species Act Section 4(d) rule for the coastal California gnatcatcher that would define conditions under which "take" of the species could occur without violation of the Endangered Species Act. That is, the MSCP is a plan and process for the issuance of permits under the federal and state Endangered Species Acts and the state's Natural Community Conservation Planning Act of 1991.

On March 18, 1997, the City of San Diego adopted the MSCP. An objective of the MSCP is to conserve a connected system of biologically viable habitat lands in a manner that maximizes the protection of sensitive species and precludes the need for future listings of species as threatened or endangered. Responsibilities for conservation planning in the MSCP study area are organized by subareas. The input from the jurisdictions and other special district and agency participants is summarized in the Multi-Habitat Planning Area MHPA maps (see Figures 3-2, 3-3, and 3-4 of the MSCP).

The MHPA is the area within which the permanent MSCP preserve will be assembled and managed for its biological resources. The MHPA is defined in many areas by mapped boundaries, as mentioned above in the referenced figures of the MSCP, and also is defined by quantitative targets for conservation of vegetation communities and goals and criteria for preserve design. Within the NCFUA, the MHPA boundaries are as shown in the Biology section of this MEIR. Resources to be preserved in the MHPA include coastal sage scrub, southern maritime chaparral, various wetland habitats and many sensitive and/or listed plants and animals. The MHPA in this area is largely comprised of regional linkages leading to biological core areas within existing reserves and parks. The City of San Diego MSCP Subarea Plan with respect to the NCFUA states the following: "Subareas III and IV contain only extended regional corridors, linking to the north west and south. These corridors primarily lie in canyons or drainages, and the majority require restoration to enhance their long-term value. The subarea preserve plan also contains a list of specific guidelines for the proposed NCFUA subarea; of which four apply to the proposed project area:

- C 12 Incorporate bridges to facilitate wildlife crossings (MSCP open space to Gonzales Canyon; McGonigle and Deer Canyon areas).

- C 14 Provide fences or barriers along the edges of the shallow north/south-trending canyon that connects Carmel Valley to Gonzales Canyon to direct public access to appropriate locations.
- C 17 If this area develops or redevelops, the MHPA boundary should be accommodated with the majority of the floodplain to be placed in open space and restored where possible to natural habitats.
- C 19 In the event that the MHPA configuration is not implemented pursuant to the "Pardee Settlement Agreement," then the MHPA configuration shall be per the NCFUA Framework Plan. Provide an undercrossing of San Dieguito Road for wildlife movement from Gonzales Canyon of the San Dieguito River.

On July 14, 1997, the City of San Diego signed an Implementing Agreement with the U.S. Fish and Wildlife Service and California Department of Fish and Game. The Implementing Agreement is the contract between the City and the wildlife agencies, which outlines the obligations and commitments made for the successful completion of the MSCP. The agreement has been signed by all parties and is effective July 17, 1997.

The Implementing Agreement now allows the City of San Diego to issue Incidental Take Authorizations under the MSCP. The ITAs replace the Interim Habitat Loss 4(d) permit that was established in August 1994 for permitting take of the California gnatcatcher and its associated habitat, coastal sage scrub.

The MSCP amends and enlarges the NCFUA Environmental Tier and supersedes it. Hereinafter, the term "MHPA" is used to refer to the biologic open space system in the Pacific Highlands Ranch Subarea Plan.

f) Local Coastal Program

The North City Local Coastal Program was certified by the California Coastal Commission in 1988. The North City LCP addresses the Torrey Pines, North City West, Mira Mesa, and University-La Jolla communities of the city of San Diego. The coastal zone boundaries for the North City LCP extend up McGonigle and Deer Canyons into Pacific Highlands Ranch (Figure 4A-5). The LCP designates the entire coastal zone within Pacific Highlands Ranch for open space/park uses. The natural resources which are within the coastal zone boundaries in Pacific Highlands Ranch are subject to the policies and ordinances which comprise the North City LCP, as required by the California Coastal Act of 1976, as amended. Relevant issues, goals, and proposals presented in the LCP for this area include:

- Determination of compatible land uses within areas designed for open space.
- Protection of significant wildlife habitat areas through the designation and protection of sufficient buffer areas.
- Identification of geologic instability and performance standards for grading and construction.
- Protection of important downstream coastal wetland resources through application of appropriate upstream mitigation measures.
- Delineation, protection, and mitigation of existing archaeological and paleontological resources.
- Encouragement of alternative modes of transportation.

The portion of Pacific Highlands Ranch within the coastal zone is under the jurisdiction of the State of California and not the City of San Diego. An amendment to the adopted LCP would be required to bring the LCP land use plan into conformance with the adopted subarea plan.

Land Use Issues

1. Would the proposed project implement the goals, objectives, and recommendations of the City of San Diego Progress Guide and General Plan and the environmental goals of the Framework Plan for the North City Future Urbanizing Area? Would the proposed project implement existing City plans and policies?
2. Would the project result in a conflict with the purpose and intent of the Resource Protection Ordinance?
3. Would the project result in a conflict with the purpose and intent of any current planning process or adopted environmental plans or policies on the area?
4. Would the project be compatible with existing and planned land uses in the project vicinity? Would the uses proposed within the subarea result in any internal land use conflicts?
5. How is the project consistent with the region's Multiple Species Conservation Program and the City of San Diego Subarea Plan?

1) Issue

Would the proposed Pacific Highlands Ranch plan implement the goals, objectives, and recommendations of the City's Progress Guide and General Plan and the environmental goals of the North City Future Urbanizing Area Framework Plan? Would the proposed project implement other existing City plans and policies?

Impacts

a) Consistency with Progress Guide and General Plan

The General Plan's environmental goals for conservation, open space, future development, and preservation of agricultural land are discussed above under Existing Conditions. As they pertain to the proposed Pacific Highlands Ranch Plan, they include the preservation of open space and landforms including undeveloped valleys and canyons. Following is an analysis of both plans' (Plan 1 and Plan 2) consistency with these goals and policies:

Subarea Plan 1. Plan 1 would develop core, peripheral, and low density residential units primarily north of Alignment F of SR-56. The approximately 1,2680-acre open space area, which is a part of the MHPA, would be primarily located in McGonigle and Deer Canyons, along the northern boundary on the north-facing slopes above La Zanja Canyon, and in an unnamed north/south-running canyon in the western portion of the subarea. This north-south tributary would connect with Gonzales Canyon to the north via an animal undercrossing of the SR-56 alignment. The eastern end of Gonzales Canyon and a northerly tributary to McGonigle Canyon would be open space as part of an urban amenity open space. This continuous and connected area would provide a secondary, alternative small wildlife linkage between McGonigle and Gonzales Canyon, as well as visual relief from the proposed development.

Plan 1 for Pacific Highlands Ranch would not provide for agricultural uses as described in the General Plan. As discussed in Chapter 4.I of this MEIR, Natural Resources/Agriculture, soils on the project site are suitable for agricultural use and much of the northern and western portions of the site have been or are currently supporting agricultural uses. Permanent open space and development are proposed within these agricultural areas. As a result, the project would not be generally consistent with the goal of the General Plan to preserve premium agricultural lands.

The compliance of the proposed Environmental Tier (referred to as the MHPA in this MEIR) with the City's Resource Protection Ordinance is also addressed below under Issue 2.

Subarea Plan 2. Plan 2 would also provide for open space throughout the subareas. Like Plan 1, the MSCP open space preserve area (approximately 1,266⁹⁸ acres under Plan 2) would be functionally equivalent with the MSCP design. Plan 2 incorporates Alignment D of SR-56. Also, Plan 2 would not support any agricultural uses.

b) Consistency with the Environmental Goals of the Framework Plan

The environmental goals of the Framework Plan are listed in the Existing Conditions above. These goals relate primarily to the need to preserve natural topographic features and biological resources as open space with the Environmental Tier. Since adoption of the Framework Plan in 1992, the City has prepared a MSCP northern subarea preserve plan to guide implementation of the MSCP in that portion the city. Within the northern subarea, the preserve system is largely comprised of regional linkages leading to biological core areas within existing reserves and parks. This natural open space system associated with the MSCP has refined and superseded the Environmental Tier as described in the Framework Plan.

Following is an analysis of each of the proposed plans' consistency with the environmental goals of the Framework Plan. A detailed discussion of the subarea plan's consistency with MSCP goals and policies is included under Issue 5 below:

Subarea Plan 1. Subarea Plan 1 is considered functionally equivalent with the MSCP preserve design and the Framework Plan's Environmental Tier. As shown in Figure 4A-1, the open space system for the Framework Plan calls for the preservation of McGonigle and Deer Canyons in order to provide a connection with Carmel Valley to the southwest and the area surrounding Black Mountain Park to northeast. An unnamed north/south-trending canyon is shown as connecting the Carmel Valley/McGonigle/Deer Canyons linkage with Gonzales Canyon to the north. Also, an urban/natural amenity is shown as providing an additional wildlife linkage between the main southern linkage and Gonzales Canyon in the north. Figure 3-5 shows the relationship of Plan 1 with the adopted MSCP preserve boundary.

With respect to the circulation system, (see Figure 3-1), Plan 1 would propose a similar circulation system as that anticipated in the Framework Plan. The proposed SR-56 alignment is more northerly and Camino Santa Fe would provide an east-west through link between Carmel Valley Road and the south. Three bridge structures are proposed to be incorporated into SR-56, one bridge in Del Mar Heights Road in the western portion of the subarea and one bridge in the southern portion of Camino Santa Fe/Carmel Valley Road. All of these structures are intended to accommodate wildlife movement, consistent with the goals of the Framework Plan. However, because the proposed project would result in identified significant direct and cumulative unmitigated traffic impacts (see Chapter 4.B., Traffic Circulation) at some roadway and freeway segments, the Subarea

Plan would not fully implement the Framework Plan principle of developing a transportation system that avoids impacts at adjoining communities.

The development pattern, proposed intensity, and topographic alteration incorporated in Plan 1 would be generally consistent with that anticipated in the Framework Plan.

In terms of circulation, no significant traffic impacts have been identified that relate to the development intensity proposed by the Pacific Highlands Ranch Plan.

Subarea Plan 2. The ~~two-18~~-acre difference between the MSCP open space acreage under Plans 1 and 2 is inconsequential and would not affect the conclusions stated above for Plan 1. Plan 2 would also be functionally equivalent to the adopted MSCP open space preserve design.

The primary difference with the Plan 2 alignment for SR-56 is that the western portion of SR-56 in Pacific Highlands Ranch would be located more northerly than in Plan 1 and the Carmel Valley Road/Camino Santa Fe link would be pushed towards the central portion of the subarea. The result is that the on/off ramps for SR-56/Carmel Valley Road/Camino Santa Fe exchange would avoid the north-south MSCP open space canyon on the western side of the subarea. To accommodate wildlife movement, bridging of the north-south open space canyon would still be required. However, this freeway bridge would be in much closer proximity (approximately 900 feet versus 4,000 feet) to the bridge on Del Mar Heights Road to the north (see Figure 3-2).

The development pattern and proposed intensity incorporated in Plan 2 for Pacific Highlands Ranch is also generally consistent with that anticipated in the Framework Plan and would not create adverse impacts.

c) Consistency with the Local Coastal Program

Subarea Plans 1 and 2. A comparison of Figures 4A-5 and 4A-6, which show the coastal zone boundaries, with the proposed plans indicates that most of the on-site coastal zone is within the proposed open space. Nearly all the proposed development will take place outside of the coastal zone. The only exceptions are a small area of low density residential at the eastern boundary in Plan 1 (see Figure 4A-5) and portions of low density residential, peripheral residential, and senior high school along the southernmost limits of the development area in Plan 2. In addition, the southern half of the approved and built 29-unit Rancho Glens Estates development along Caminito Mendiola in the interior of Pacific Highlands Ranch is located within the coastal zone (see discussion below).

The North City LCP designates all of the coastal zone within Pacific Highlands Ranch for open space and park uses, with the exception of the southwest corner of the site, west of

the existing Carmel Valley Road, which is designated residential. The low density residential area at the southwestern corner shown under Plan 2 would be consistent with this designation. In addition, the low density residential shown near the eastern boundary south of SR-56 under both Plan 1 and Plan 2 and portions of the peripheral residential and senior high school within the coastal zone under Plan 2 would not be consistent with the LCP. The previously approved Rancho Glens Estates development is also located in an area of the coastal zone which was designated as open space in the North City LCP. However, a coastal development permit was obtained from the Coastal Commission prior to implementation of the project.

Both plans are considered to be consistent with the general LCP goals and objectives regarding the protection of significant wildlife habitat areas within the coastal zone, emphasis of Del Mar Heights Road as the major east/west link through the Carmel Valley, inclusion of a circulation plan which is designed to blend with the natural topography and complement adjacent land uses, and encouragement of alternative modes of transportation. The LCP does not specifically address transportation corridors through Pacific Highlands Ranch, other than to indicate that State Route 56 will be evaluated in the LCP when funding for this facility becomes available. An amendment to the LCP will be required in conjunction with approval of the proposed Pacific Highlands Ranch Plan, and SR-56, to incorporate the planned transportation corridors and any other land use variations from the existing LCP.

Significance of Impacts

Subarea Plans 1 and 2. Both proposed plans are generally consistent with the intent of the General Plan, environmental goals of the adopted NCFUA Framework Plan, Council Policy 600-40, and the North City LCP. The lack of compliance with the preservation of agricultural lands described in the Framework Plan, and the impacts to the circulation system represents a significant direct and cumulative land use impact.

Mitigation, Monitoring, and Reporting

Subarea Plans 1 and 2. The No Project alternative would avoid impacts to the General Plan agricultural lands preservation goal, and the NCFUA circulation system principles.

2) Issue

Would the Pacific Highlands Ranch Plan result in a conflict with the purpose and intent of the Resource Protection Ordinance?

Impacts

Subarea Plans 1 and 2. Under current City of San Diego regulations, a RPO permit is not required for the Pacific Highlands Ranch Plan but would be needed for any subsequent development proposals. However, to comply with provisions of City Council Policy 600-40, a RPO analysis was prepared for the entire subarea to determine overall RPO consistency. This analysis is included as Appendix B to the EIR.

If the City Council approves the Pacific Highlands Ranch Subarea Plan as a long-range plan, Council Policy 600-40 allows the Planning Commission to make substantial conformity determinations pursuant to RPO and approve future proposed maps without making alternative compliance findings. Substantial conformance determinations for development proposals pursuant to a long-range plan constitute alternative compliance of RPO. If the City Council does not approve the subarea plan as a long-range plan, then the alternative compliance pursuant to RPO must be satisfied.

Steep Slopes—Pacific Highlands Ranch has approximately 369 acres (14 percent of the site) of sensitive hillsides (slopes in excess of 25 percent). Given, this percentage of on-site steep slopes, the maximum allowable encroachment would be 7 percent or 25 acres. The proposed encroachments under Plan 1 (63.7 acres or 17.3 percent) and Plan 2 (70.4 acres or 19.1 percent) would exceed the allowances under RPO.

Biologically Sensitive Resources—Both Plan 1 and Plan 2 have been designed to comply with the MHPA and the requirements of the MSCP Subarea Plan (see Issue 5 below). The project would be functionally equivalent with the MHPA and would be consistent with the Development Regulations for Sensitive Biological Resources and Biology Guidelines (Section 101.0462.0026 of RPO). The proposed projects' compliance with the six components regarding biologically sensitive lands are listed below:

- **Lands included in the MHPA—**Encroachment into the MHPA is proposed under both Subarea Plans, but the plans provide for a MHPA preserve which is functionally equivalent and would enhance the long-term conservation of resources.
- **Wetlands—**Relatively minor impacts (i.e., less than three acres) to wetlands in conjunction with road crossing and limited development areas would occur under both plans. Mitigation is proposed which would reduce the direct biological impacts to below a level of significance, but not the cumulative impacts.
- **Tier I, II, III habitats outside of the MHPA—**Impacts to these Tier habitats would occur under both Subarea Plan 1 and Plan 2. These impacts are allowed pursuant to the MSCP and mitigation for the impacts would be provided. However, cumulative impacts to grasslands would remain significant.

- Land supporting rare, threatened, or endangered species—Impacts to the coastal California gnatcatcher and Del Mar manzanita would occur, but mitigation for these impacts pursuant to the MSCP Subarea Plan is provided.
- Narrow endemics—Narrow endemic species as described in the MSCP Subarea Plan do not occur within Subarea III.
- Covered Species—Impacts to covered species are identified, but mitigation for these impacts pursuant to the MSCP Subarea Plan is provided.

Wetland and Wetland Buffers—Wetlands within Pacific Highlands Ranch are described based on the RPO definition which requires satisfaction of any one of the three parameters (vegetation, soils, or hydrology) to define a wetland. Wetland vegetation as shown in the Biology section of the EIR was used to define wetland areas. The identified wetlands on-site are in topographically defined drainages or agricultural impoundments and consist of southern willow scrub, mule fat scrub, and coastal and valley freshwater marsh (approximately 31 acres). Both subarea plan designs have been designed to avoid, minimize, and mitigate the wetland impacts. However, there would be a minimal encroachment into wetlands for road crossings and limited development areas under both Plans 1 and 2; approximately 2.6 acres under Plan 1 and 2.5 acres under Plan 2. Also, both plans incorporate wetland buffers on both sides of the Gonzales Canyon urban amenity corridor. Because wetland impacts would not be avoided as required in the development regulations under RPO, a deviation from the development regulations of RPO would be required. The deviation requirement process is identified in the ordinance. The wetland impacts, however, would comply with the requirements of the MSCP as described below in Issue 5.

Floodplains—The development footprint for Pacific Highlands Ranch would impact approximately 29.5 acres of floodplains as mapped by the federal government under Plan 1 and approximately 30.6 acres under Plan 2.

Significant Prehistoric Sites—The entire property has been inventoried and all cultural sites evaluated for significance under RPO. Chapter 4.F of this MEIR contains a detailed discussion of on-site cultural resources and the proposed data recovery mitigation measures. Because three of the sites within Pacific Highlands Ranch boundaries have been proposed for National Register Eligibility in conjunction with the SR-56 EIR (City of San Diego 1998) these sites are considered significant under RPO. Although data recovery has been proposed to adequately mitigate the impacts to these sites and the design of each subarea plan avoids the impacts to the extent feasible, preservation of RPO-significant sites is required under the provisions of the ordinance.

Significance of Impacts

Subarea Plans 1 and 2. Both subarea plans have been prepared consistent with the requirements of City Council Policy 600-40. However, both plans would not be consistent with the encroachment provision of RPO as they apply to steep slopes, wetlands, and significant prehistoric sites. As such, this would represent a significant direct and cumulative land use impact.

Mitigation, Monitoring, and Reporting

Subarea Plans 1 and 2. Although both subarea plans have been designed to minimize impacts to RPO-sensitive resources, strict compliance with the development regulations of the ordinance would require a project redesign. The plans' inconsistency with the RPO encroachment provisions can be avoided with implementation of the No Project alternative and mitigated to below a level of significance by adoption of a RPO alternative. These alternatives are discussed in Chapter 8 of this EIR.

3) Issue

Would the project result in a conflict with the purpose and intent of any current planning process or adopted environmental plans or policies for the area?

Impacts

a) Consistency with the San Dieguito River Regional Concept Plan

Subarea Plans 1 and 2. The planning area for the San Dieguito River Regional Concept Plan is adjacent to and north of Pacific Highlands Ranch. The recommended land uses and equestrian/hiking amenities in the regional plan are consistent with the residential and proposed MSCP open space land uses which are proposed in both Plan 1 and Plan 2.

b) Consistency with the San Dieguito River Regional Open Space Focused Planning Area

Subarea Plan 1. The San Dieguito River Valley Regional Open Space Park FPA would extend through Pacific Highlands Ranch along Gonzales Canyon and includes the bluffs above the canyon to the north. The FPA also extends into the northernmost portions of Pacific Highlands Ranch from the off-site La Zanja Canyon. Plan 1 would include a plan for a trail system within the open space system. The trail system would include hiking, biking, and equestrian trails that connect with pedestrian and bike paths within the built neighborhoods. The trails would be located within the proposed urban amenity areas.

Thus, Plan 1 for Pacific Highlands Ranch would accommodate the trail system goals in the FPA, especially in the area of Gonzales Canyon.

Subarea Plan 2. Plan 2 also would include a trail system within the open space system. The trail system would connect with pedestrian and bike paths within the built neighborhoods. The trails would be located within the proposed biological buffer, transition zone, and urban amenity areas but would be prohibited from the habitat protection area, unless there were no other feasible alternatives. Thus, Plan 2 would accommodate the trail system goals in the FPA, especially in the area of Gonzales Canyon.

Significance of Impacts

Subarea Plans 1 and 2. Both Plan 1 and 2 for Pacific Highlands Ranch would accommodate the trail system goals in the FPA, especially in the area of Gonzales Canyon. Therefore, they are considered consistent with the goals and objectives of the FPA.

Mitigation, Monitoring, and Reporting

Subarea Plans 1 and 2. No mitigation would be required.

4) Issue

Would the project be compatible with existing and planned land uses in the project vicinity? Would the uses proposed within the subarea result in any internal land use conflicts?

Impacts

a) Compatibility with Existing Off-Site Land Uses

Subarea Plans 1 and 2. All commercial and office uses would be located in the Village in the interior of Pacific Highlands Ranch under both subarea plans and would not pose a land use compatibility problem for the existing residential land uses adjacent to the subarea. As described in the existing condition section above, both plans show predominantly open space uses adjacent to the subarea boundary, except for areas of very low density residential along the northern boundary and a very small area of low density residential land use at the eastern boundary. With the exception of the extension of Camino Santa Fe, there would be no development proposed for the southern boundary of the subarea. The proposed residential densities and MSCP open space uses along the

Pacific Highlands Ranch boundary would be generally compatible with the adjacent, off-site, existing open space, equestrian, agricultural, nursery, golf course, and estate single-family residential uses.

b) Compatibility with Planned Land Uses Surrounding Pacific Highlands Ranch

Subarea Plans 1 and 2. The planned land uses in Carmel Valley, Fairbanks Ranch, and San Dieguito (San Diego County) planning areas, which are immediately adjacent to Pacific Highlands Ranch, are all estate and single-family residential and open space uses. These uses would be considered compatible with the single-family residential and open space uses proposed within Pacific Highlands Ranch under both plans.

The planned land uses within Subareas IV and V of the NCFUA, which would be adjacent to Pacific Highlands Ranch, would include open space and single-family residential units. Subarea V uses include open space and residential uses, which would be compatible with the adjacent open space and residential uses proposed in Pacific Highlands Ranch. These uses are considered to be compatible with the single-family residential and open space uses proposed within Pacific Highlands Ranch under both plans.

c) Land Use Compatibility within Pacific Highlands Ranch

Subarea Plans 1 and 2. Land use compatibility impacts for the uses proposed within Pacific Highlands Ranch could occur in conjunction with aesthetic, noise, and traffic circulation interface between the uses. Within Pacific Highlands Ranch, the greatest potential for land use compatibility impacts would be within the Town Center and Village, where residential, commercial, high school, and office uses would coexist.

With respect to the Town Center and Village, both land use plans would provide transitions and buffers (e.g., roadways and landscaped grade separation) between the more intense uses in the Village and the adjacent peripheral residential, low density residential (Plan 2 only), and public high school uses. These buffering design concepts would avoid adverse land use compatibility impacts with the Village.

Another inherent potential land use compatibility issue associated with Pacific Highlands Ranch is the relationship of the various uses to the two SR-56 alignments. Irrespective of which alignment is approved by Caltrans for SR-56, there is a potential for land use compatibility impacts (i.e., adverse noise and aesthetic impacts) between the freeway and the existing and proposed uses within Pacific Highlands Ranch under both land use plans. This interface between the freeway and various residential development areas (proposed and existing Rancho Glens Estates), public high school, and the community park under both plans represents a potentially significant internal land use compatibility impact.

This freeway compatibility issue is also presented in the Revised Draft EIR for the middle segment of SR-56 (City of San Diego 1998). The SR-56 EIR identifies significant land use impacts for both freeway alignments, but concludes that the alignment associated with Plan 2 would result in greater impacts to planned land uses within Subarea III (City of San Diego 1998:4-140). The proposed employment center use adjacent to SR-56 under both Plan 1 and Plan 2 would be compatible with the freeway.

There is also the potential for land use compatibility impacts from a noise perspective due to the proximity of Del Mar Heights Road and Carmel Valley Road to adjacent residential, school, and park uses. These impacts are addressed further in Chapter 4.K, Noise, and are considered to be fully mitigable through sensitive site planning and the provision of noise attenuation measures.

Significance of Impacts

a) Compatibility with Existing Off-Site Land Uses

Subarea Plans 1 and 2. The interface of the proposed on-site uses under both land use plans for Pacific Highlands Ranch would not represent a significant land use compatibility impact with existing adjacent uses.

b) Compatibility with Planned Land Uses Surrounding Pacific Highlands Ranch

Subarea Plans 1 and 2. The interface of the proposed on-site uses under both land use plans for Pacific Highlands Ranch with the planned land uses on adjacent properties would not represent a significant land use compatibility impact.

c) Land Use Compatibility within Pacific Highlands Ranch

Subarea Plans 1 and 2. The identified potential internal land use compatibility impacts described above in conjunction with the SR-56 alignment are considered potentially significant. As noted above, the significance of this impact is also described in the Revised Draft EIR for the Middle Segment of SR-56. Also, the proposed extension of Carmel Valley Road could result in significant land use incompatibilities with the proposed Pacific Highlands Ranch residential developments along these roadways.

Mitigation, Monitoring, and Reporting

a) Compatibility with Existing Off-Site Land Uses

Subarea Plans 1 and 2. No mitigation would be required.

b) Compatibility with Planned Land Uses Surrounding Pacific Highlands Ranch

Subarea Plans 1 and 2. No mitigation would be required.

c) Land Use Compatibility within Pacific Highlands Ranch

Subarea Plans 1 and 2. Mitigation for the potential internal land use compatibility impacts associated with proposed land uses and the SR-56 freeway would consist of the requirement for landscaping and noise attenuation measures at the time tentative maps are processed.

5) Issue

How is the project consistent with the City of San Diego's Multiple Species Conservation Program (MSCP) Subarea Plan?

Impacts

The MSCP requires changes to the NCFUA Framework Plan that result in an increase in the size of the Environmental Tier area through the deletion of development acreage. Most of the changes, as expressed by the adopted MHPA, are located in Pacific Highlands Ranch. Consequently, the MSCP (adopted in 1997) supersedes the Framework Plan and acknowledges the decreases in developable areas within the subarea by adoption of the MHPA boundaries. Resources being protected through inclusion in the MHPA will be monitored and managed by the City to ensure their viability over the long term. Following is a discussion of the proposed Pacific Highlands Ranch site plans consistency with the approved MSCP.

a) Uses Allowed in the MHPA Preserve

Section 1.4.1 of the MSCP Subarea Plan lists the following land uses and activities considered conditionally compatible with the biological objectives of the MSCP and consequently allowed within the MHPA:

- Passive recreation
- Utility lines and roads in compliance with General Planning Policies and Design Guidelines discussed below.
- Limited water facilities and other essential public facilities.
- Limited low density residential uses.

- Brush Management (Zones 2 and 3).
- Limited Agriculture.

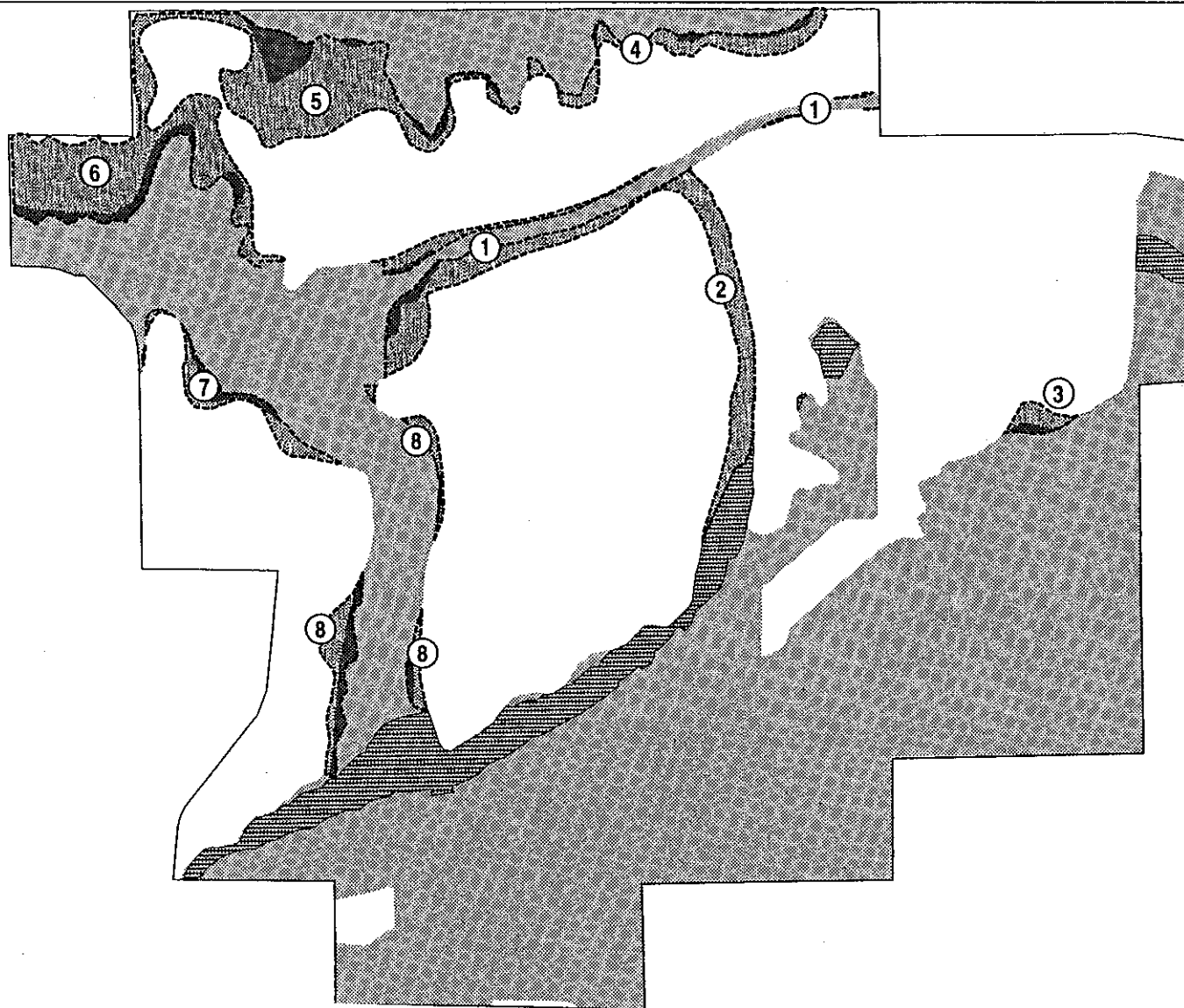
Development within the MHPA in Pacific Highlands Ranch on parcels that are wholly within the MHPA, must be consistent with the above uses. Development on such parcels would be limited to 25 percent of the parcel, be located in the least sensitive areas of the parcel and would proceed in conformance with the A-1-10 zone. Any public facilities located within the MHPA would be sited to minimize impacts to large populations of MSCP-covered plants, and revegetation disturbed areas would be required.

Both Subarea Plan 1 and Plan 2 propose only low-density residential, passive recreational, public, circulation, and brush management uses inside the MHPA. Development under either plan would not exceed 25 percent of the parcel. Some of the disturbed agricultural lands within the MHPA would be available for enhancement and restoration by project proponents needing mitigation credits or by government agencies in order to contribute to the functioning of the MHPA. Thus, the resultant development of Pacific Highlands Ranch is consistent with the permitted uses within the MHPA.

b) Relationship to the MSCP Preserve Area

As shown in Figures 4A-7 and 4A-8, approximately 1,510 acres of Pacific Highlands Ranch is within the MHPA of the MSCP. Although Subarea Plans 1 and 2 would encroach into the MHPA, both plans have been deemed functionally equivalent with the MHPA as proposed in the MSCP. As described in the Project Description section of this EIR, the proposed development area for both plans has been expanded into the defined MHPA open space boundary by approximately 161.41~~149.5~~ and 230.52~~12~~ acres, respectively. The expansion into the MHPA was necessary to accommodate the realignment of SR-56 into the development area of Pacific Highlands Ranch. As discussed in the Biology section of this EIR, the impacts of this expansion are not significant. The negative impacts associated with location of SR-56 within the MHPA are largely eliminated by the realignment into the development area. This expansion has been accepted by the numerous interested conservation and planning groups. Meetings and site visits were held in 1997 and 1998 with these groups (e.g., Sierra Club, Carmel Valley Community Planning Board, the City, state and federal resource agencies, and the Endangered Habitats League), and a site design was developed which accommodated regional biological conservation goals.

As noted in the Project Description and shown in Figure 3-5 and 3-6, the MHPA boundary would also be adjusted at locations outside of Pacific Highlands Ranch. Specifically, the MHPA boundary within Carmel Valley Neighborhoods 8A and 10 would be modified. Within Neighborhood 10, the minor adjustment would result in net removal of approximately 8.41~~4~~ acres of Tier II and Tier III habitats (coastal sage scrub



CITY MHPA ADJUSTMENT ACRES

Area 2 17.9

PARDEE MHPA ADJUSTMENT ACRES

Area 1 22.3

Area 3 2.5

Area 4 12.5

Area 5 39.9

Area 6 44.1

Area 7 8.4

Area 8 13.8

Pardee Total 143.5 Acres

City Total 17.9 Acres

SR-56 71.5 Acres

Total 232.9 Acres Combined SR-56
MHPA Expansion

LEGEND

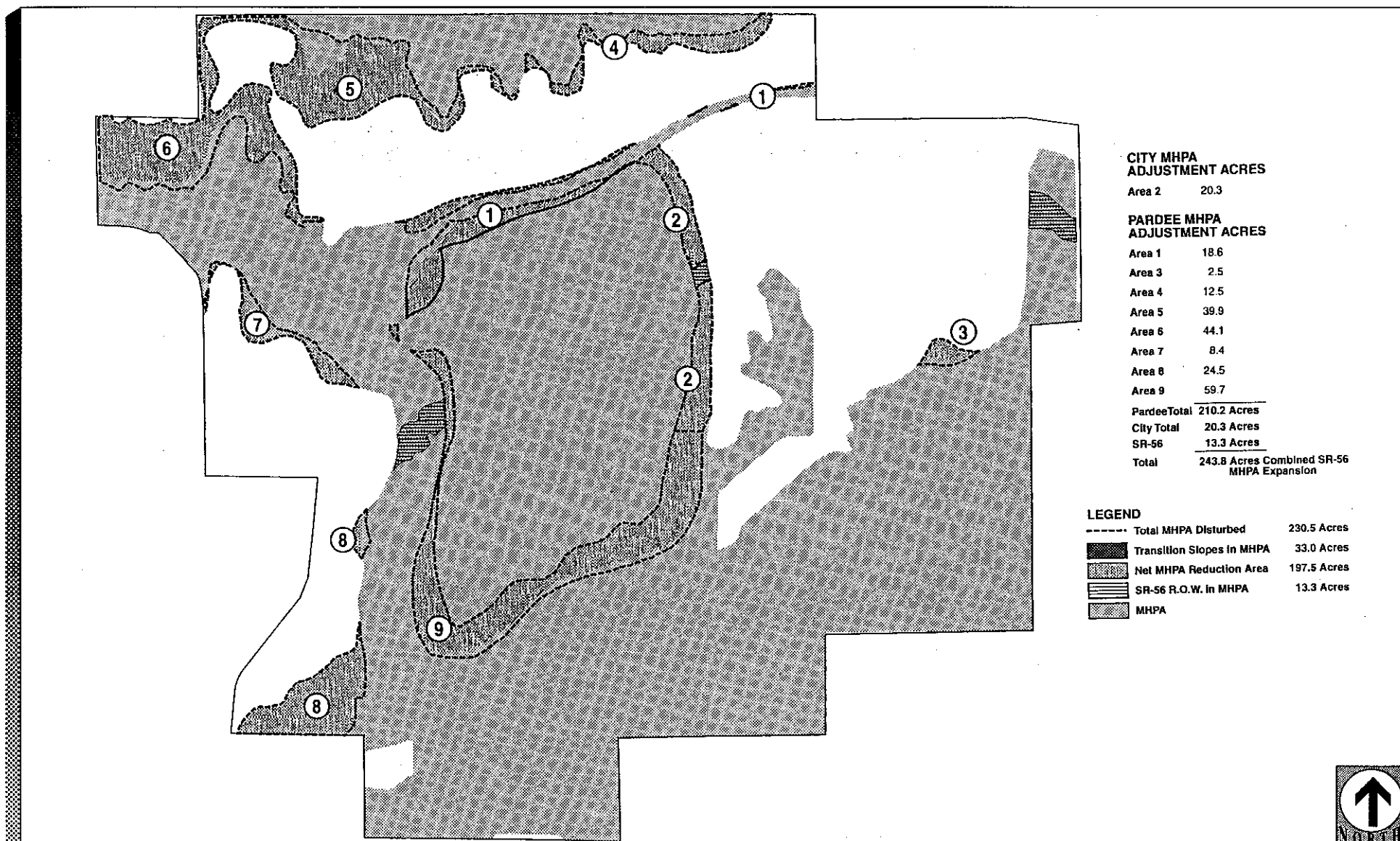
-----	Total MHPA Disturbed	161.4 Acres
■	Transition Slopes In MHPA	30.0 Acres
▨	Net MHPA Reduction Area	131.4 Acres
▧	SR-56 R.O.W. In MHPA	71.5 Acres
▩	MHPA	

Map source: Latitude 33 Planning and Engineering 1998

3560 1750 FEET 0



Figure 4A-7
Relationship of MSCP Preserve to Subarea
Plan1



CITY MHPA ADJUSTMENT ACRES

Area 2 20.3

PARDEE MHPA ADJUSTMENT ACRES

Area 1 18.6

Area 3 2.5

Area 4 12.5

Area 5 39.9

Area 6 44.1

Area 7 8.4

Area 8 24.5

Area 9 59.7

PardeeTotal 210.2 Acres

City Total 20.3 Acres

SR-56 13.3 Acres

Total 243.8 Acres Combined SR-56
MHPA Expansion

LEGEND

-----	Total MHPA Disturbed	230.5 Acres
▨	Transition Slopes in MHPA	33.0 Acres
▨	Net MHPA Reduction Area	197.5 Acres
▨	SR-56 R.O.W. in MHPA	13.3 Acres
▨	MHPA	

Map source: Latitude 33 Planning and Engineering 1998

3560 1750 FEET 0



Figure 4A-8

**Relationship of MSCP Preserve to Subarea
Plan2**

and grasslands). The land being removed from the MHPA is not within a wildlife corridor and is within a central east-west canyon which has approved development on three sides. This area is not part of a large contiguous block of undisturbed habitat. This modification would not affect the function of the preserve in Neighborhood 10.

At Carmel Valley Neighborhood 8A (Parcels A and B), approximately 150 acres would be conveyed by Pardee of which 55 acres of Tier I habitat would be added to the MHPA. An additional 20 acres within Parcel A may be added to the MHPA in the future should the City decide not to use this acreage for school/park uses. The addition of these lands to the MHPA would greatly increase the size of the habitat block planned for this particular geographic area, improving the overall preserve design and configuration, and providing greater assurances that scarce vegetation types (i.e., southern maritime chaparral) would be maintained over the long term. The addition of a relatively large block of mostly Tier I habitat within Carmel Valley Neighborhood 8A would result in a MHPA that would be functionally equivalent^{superior} to that shown in the MSCP Subarea Plan.

Overall, the reduction in the MHPA in both Pacific Highlands Ranch (described for each Subarea Plan below) and Carmel Valley Neighborhood 10 is offset by increases to the MHPA in Carmel Valley Neighborhood 8A and the NCFUA Subarea V (Deer Canyon parcel). The proposed adjustment areas would result remove largely disturbed land from the MHPA (Pacific Highlands Ranch and Carmel Valley Neighborhood 10), increase the preservation of rare Tier I resources (Carmel Valley Neighborhood 8A Parcels A and B), and remove the potential for development within the MHPA (15 acres within Subarea V Deer Canyon parcel and 75 acres within Neighborhood 8A).

Finally, Pardee Homes has agreed to other provisions which would further enhance the MHPA function. These measures consist of the following:

1. No brush management activities would be performed within the preserve along the edges of several of the proposed encroachment areas.
2. All manufactured slopes along the edge of the MHPA would be included within the MHPA and would be revegetated in accordance with a master revegetation plan.
3. Impacts to wetlands would be minimized, and mitigation if necessary would be per City Ordinance and the U.S. Army Corps of Engineers 404 Permit requirements.

4. Approximately 100 acres of disturbed land within the MHPA for Pacific Highlands Ranch would be restored per a master revegetation plan with appropriate upland and wetland habitats and a mitigation bank established. Much of this revegetation area consists of a manufactured wildlife corridor that would connect and provide for wildlife movement between Gonzales Canyon and McGonigle Canyon.
5. Conveyance of habitat within Carmel Valley Neighborhood 8A and Subarea V (Deer Canyon).

Subarea Plan 1. Under Subarea Plan 1, approximately 1,280 acres would be set aside as dedicated MHPA open space, 20 acres for urban amenity uses, and ~~30-24~~ acres of active use open space (includes parks and schools). Subarea Plan 1 proposed development would encroach about ~~161.4-149.9~~ acres into the MHPA that was adopted in the MSCP Subarea Plan. Pacific Highlands Ranch is part of the total 52,000-acre MHPA. This encroachment includes the following areas:

1. Adjacent to existing development in Gonzales Canyon in the northwestern portion of Pacific Highlands Ranch to be developed for low-density residential uses;
2. At the edge of south-facing slopes adjacent to existing agricultural fields in the upper reaches of Gonzales Canyon;
3. For the proposed park and urban amenity areas in the upper reaches of Gonzales Canyon;
4. On both sides of the north-south corridor between Gonzales Canyon and McGonigle and Deer Canyons; and
5. On the south-facing slopes in the upper reaches of McGonigle Canyon would be encroached for development of the elementary school site and low-density residential uses.

While the natural open space system proposed under Subarea Plan 1 would be approximately 6 percent smaller than that proposed by the MSCP, it would establish a system of wildlife corridors and habitat areas that would successfully function in the same manner as that proposed by the MSCP and would eliminate much of the habitat fragmentation that would otherwise have resulted from SR-56 being within the MHPA as shown in the Framework Plan. The on-site open space system would preserve the habitats and major wildlife corridors south of SR-56 (i.e., Deer and McGonigle Canyons and Santa Monica Ridge) and provide the required northerly linkage/wildlife corridor via a north-south tributary canyon to Gonzales Canyon. Gonzales Canyon leads out of the subarea westerly through the Del Mar Highlands Estates PRD property and drains into the San Dieguito River valley. This north-south corridor between McGonigle and

Gonzales Canyons is currently disturbed grasslands and requires grading and revegetation to function as part of the regional wildlife preserve system. Upon completion, this new linkage would be approximately 600 feet to 900 feet wide, and will be approximately 4,000 feet long. The minimum wildlife corridor widths at the northwest along Gonzales Canyon and at the southeast at McGonigle Canyon would be 1,000 feet.

In order to facilitate wildlife movement, bridges would be located where Del Mar Heights Road and SR-56 cross the north-south corridor that connects McGonigle Canyon and Gonzales Canyon, and where SR-56 and Camino Santa Fe Road cross McGonigle and Deer Canyons. Culverts would be used in other locations along both Del Mar Heights Road and SR-56 to cross canyons that are not located within the MHPA. Undercrossings (i.e., wildlife culverts) would be beneath SR-56 and Del Mar Heights Road to facilitate wildlife movement. The steep north-facing slopes above La Zanja Canyon and the San Dieguito River valley along the northern boundary of the subarea would also be a component of the natural open space system. Thus, the proposed open space system is considered functionally equivalent with the MHPA as proposed in the MSCP, requiring only an amendment to the adopted MHPA boundaries.

Subarea Plan 2. Under Subarea Plan 1, approximately 1,2968 acres would be set aside as dedicated MHPA open space, 20 acres for urban amenity uses, and 30 acres of active use open space (includes parks and schools). Subarea Plan 2 proposed development would encroach about 230.5242 acres into the approximate 1,510 acres (amounts to 15 percent of the MHPA within Pacific Highlands Ranch) proposed by the MSCP for the MHPA. This plan would also require an amendment of the adopted MHPA boundaries. This encroachment includes the following:

1. Adjacent to existing development in Gonzales Canyon in the northwestern portion of Pacific Highlands Ranch to be developed for low-density residential uses;
2. At the edge of south-facing slopes adjacent to existing agricultural fields in the upper reaches of Gonzales Canyon;
3. For the proposed park and urban amenity areas in the upper reaches of Gonzales Canyon.
4. On both sides of the north-south corridor between Gonzales Canyon and McGonigle and Deer Canyons;
5. On the south-facing slopes in the upper reaches of McGonigle Canyon for development of the elementary school site and low density residential uses;

6. In the southeast corner of the subarea for low density residential uses; and,
7. On the north side of McGonigle Canyon for low-density residential uses, peripheral residential uses, and for a senior high school site.

As with Subarea Plan 1, Subarea Plan 2 maintains the system of wildlife corridors and habitat areas that are critical to the successful function of the MSCP. The additional encroachment areas under Subarea Plan 2 are mostly within lands previously disked for agriculture. The proposed open space system proposed under this subarea plan is also considered functionally equivalent to the MHPA as proposed by the MSCP.

c) MSCP Functional Equivalency

Subarea Plans 1 and 2. The adopted MSCP allows adjustments to the MHPA if the adjustment will result in the same or higher biological value for the preserve. The comparison of biological value is to be based on certain factors which are discussed below. The proposed Pacific Highlands Ranch adjustments for either Subarea Plan 1 or 2 meets all of these factors in light of the boundary adjustment components discussed above. The factors include the following:

1. Effects on significantly conserved habitats: The adjustment will maintain the status of conserved habitats through implementation of the MSCP ratios identified in the Biology Guidelines. The reduction of disturbed/agricultural habitat in Pacific Highlands Ranch would be compensated through the conservation of largely Tier I habitats within Neighborhood 8A.
2. Effects on covered species: The adjustment does not affect any large populations of covered species.
3. Effects on habitat linkages and function of preserve areas: The adjustment maintains affected natural linkages at a minimum width of 1,000 feet, and provides a large block of habitat within the middle of a major linkage (i.e., Gonzales Canyon) to allow breeding, foraging and other natural life functions to exist in the linkage.
4. Effects on preserve configuration and management: The adjustment generally either maintains the shape and size, or increases the size of the preserve as shown in the City's MSCP Subarea Plan, and will not affect either configuration or the necessary level of management.

5. Effects on ecotones or other conditions affecting species diversity: The adjustment conserves all blocks of large habitat shown in the MHPA in the City's Subarea Plan.
6. Effects to species of concern not on the MSCP-covered species list: The adjustment does not affect known populations of other species that might be considered sensitive in the city of San Diego.

The addition of approximately 75 acres of largely Tier 1 habitat to the MHPA in Carmel Valley Neighborhood 8A will greatly increase the size of the habitat block planned for this particular geographic area, improving the overall preserve design and configuration, and providing greater assurances that the scarce botanical resources associated with southern maritime chaparral will be maintained over the long term. The deletion of approximately 15 acres of land with development potential within the MHPA at Subarea V (Deer Canyon parcel), revegetation of wetlands and movement corridors, and elimination of brush management within certain areas of the MHPA all contribute to the establishment of a MHPA in the North City area that is functionally equivalent ^{superior} to that shown in the MSCP Subarea Plan.

d) Consistency with MSCP Northern Subarea Plan Guidelines

The MSCP Subarea Plan includes specific guidelines for the NCFUA that must be incorporated into the NCFUA in order for the MHPA to function properly, and for the City's take authorizations to be valid. As described above, four guidelines are applicable to development within Pacific Highlands Ranch. It follows:

- C 12 Incorporate bridges to facilitate wildlife crossings (Gonzales and McGonigle Canyon areas).

Both Subarea Plans 1 and 2 would accommodate these provisions for wildlife movement through the subarea. Two bridge-span road crossings to allow wildlife movement from the south (McGonigle and Deer Canyon areas) to the north (Gonzales Canyon area) have been incorporated into both Plan 1 and 2 for the subarea. In addition, Del Mar Heights Road would ~~include wildlife undercrossing culverts~~ be bridged to accommodate the north/south movement from Carmel Valley to Gonzales Canyon.

- C 14 Provide fences or barriers along the edges of the shallow north-south trending canyon that connects Carmel Valley to Gonzales Canyon to direct public access to appropriate locations.

Both Subarea Plans 1 and 2 would accommodate these fencing provisions within the major wildlife corridor connecting Carmel Valley with Gonzales Canyon. No trails would be located within this corridor and fencing of the low-density residential development of the west side of the corridor is included in the Pacific Highlands Ranch

Subarea Plan. Each future development project within Subarea III would be required to address the dimensions and type of fencing and barrier located along either side of the north/south-trending canyon that connects McGonigle Canyon to Gonzales Canyon.

- C 17 If this area develops or redevelops, the MHPA boundary should be accommodated with the majority of the floodplain to be placed in open space and restored where possible to natural habitats.

Both Subarea Plans 1 and 2 would avoid impacts to the majority of floodplains (i.e., Gonzales Canyon and McGonigle Canyon) as these areas would either be part of the MHPA or within the urban amenity open space.

- C 19 In the event that the MHPA configuration is not implemented pursuant to the "Pardee Settlement Agreement," then the MHPA configuration shall be per the NCFUA Framework Plan. Provide an undercrossing of San Dieguito Road for wildlife movement from Gonzales Canyon of the San Dieguito River.

Both Subarea Plans 1 and 2 have been designed to conform with the configuration as described in the Pardee Settlement Agreement.

e) Compliance with MHPA Planning Policies and Design Guidelines

Section 1.4.2 of the MSCP Subarea Plan includes general planning policies and design that are to be used in the planning of projects located adjacent to or within the MHPA. These policies and guidelines address the construction of roads and utilities; fencing, lighting, signage; materials storage, mining/extraction/processing facilities, and flood control. These topics as they relate to Pacific Highlands Ranch site plans are addressed below.

The backbone circulation element road system, roads connecting development areas with major roads, and utilities (water, sewer, electrical) are included in both Plans 1 and 2 for the subarea. The grading envelopes, rights-of-way and easements have been identified and any losses of sensitive habitat have been identified and incorporated into mitigation commitments. Two bridge-span crossings of wildlife corridors are within the preserve area are also included. The remaining local streets and utilities to serve future development would be located within the designated development envelopes and would not impact preserve areas.

Any fencing along property boundaries facing the open space corridors should be designed and constructed of materials that are compatible with the open space corridors.

Lighting of parking and outdoor areas is to be at a minimum intensity required for safety, the light source directed downward and shielded so as to avoid intrusion into the preserve

and adverse effects on wildlife. These design restrictions would be included in all future residential development fronting the preserve areas. Signage proposed for the subarea would be limited to specified uses. These uses generally would include access points, litter control, and for educational purposes.

Storage or use of potentially hazardous or toxic chemicals within the preserve area would not occur in the subarea.

Three major drainage areas located in Pacific Highlands Ranch (Gonzales, McGonigle, and Deer Canyons) are within the preserve areas and have established floodways. A small portion of the subarea drains northward into La Zanja Canyon. No flood control structures or features are proposed for the creek systems in the Pacific Highlands Ranch Plan. Both SR-56 alignments will cross a tributary to Carmel Valley Creek with bridge spans. Del Mar Heights Road will cross the same tributary with a bridge span as well. Impacts to any jurisdictional waters or wetlands will be reviewed and appropriate mitigation measures approved by the U.S. Army Corps of Engineers, California Department of Fish and Game, the U.S. Fish and Wildlife Service, and the City of San Diego.

f) Land Use Adjacency Guidelines

Section 1.4.3 of the MSCP Subarea Plan includes guidelines that all land uses adjacent to the MHPA will be managed to "ensure minimal impacts to the MHPA." The Pacific Highlands Ranch site plans will implement these guidelines as follows:

Drainage

Both Plan 1 and 2 for the subarea include detention and desilting basins to retain runoff from developed areas. The basins would be located in the appropriate locations to collect runoff flowing to Gonzales Creek and in the southern portion to collect runoff flowing into the McGonigle and Deer Canyon drainages. Other Best Management Practices would be used to control runoff into the preserve.

Toxics

The MSCP Subarea Plan states that land uses, such as recreation and agriculture, that use chemicals or generate by-products that are potentially toxic or impactive to sensitive plants and animals that live in the MHPA should incorporate measures to reduce impacts caused by the application and/or drainage of such materials into the MHPA. Within Pacific Highlands Ranch, such measures may include detention basins, grass swales, or mechanical trapping devices to be used as appropriate. These systems will be inspected yearly and replaced or repaired as needed. Removal of exotic plants, sediment or other routine maintenance would not require any permits or permissions.

Lighting

As discussed above, lighting of parking and outdoor areas would be at a minimum intensity required for safety, the light source directed downward and shielded so as to avoid intrusion into the preserve and adverse effects on wildlife.

Noise

The primary source of noise generation in the subarea will be from major road traffic. Noise from major roads is anticipated to be below 65 decibels community noise equivalent level (dB CNEL) within 150 feet of the road edge crossing the preserve areas. The only uses adjoining the preserve would be residential which is not anticipated to generate chronic noise impacts to wildlife. Restrictions for noise impacts on grading and construction of lands adjacent to the MHPA consistent with the MSCP Subarea Plan would be implemented during the gnatcatcher breeding season. Grading inside the MHPA preserve or within 100 feet of the MHPA is prohibited during gnatcatcher breeding season. Grading outside these areas may proceed year round.

Barriers

Any permanent fencing along property boundaries facing the open space corridors should be designed and constructed of materials that are compatible with the open space corridors. Temporary fencing could be implemented within the preserve to protect native plant revegetation and restoration.

Invasive Species

Both Plans 1 and 2 for the subarea have a listing of appropriate landscape plantings for residences and in Amenity open space that restrict non-native plant species. Similar landscape guidelines would be included in proposals for future development within Pacific Highlands Ranch.

Brush Management

Brush management zone 1 would be located on the development pad and outside the MHPA. Zone 2 would be included within the MHPA. Both Subarea Plans (1 and 2) would locate Brush Management Zone 2 within the MHPA. Brush management plans for these areas would be required when development entitlements are applied for.

Grading/Land Development

The MSCP Subarea Plan states that manufactured slopes associated with site development shall be included within the development footprint for projects within or adjacent to the MHPA. All development proposed for Pacific Highlands Ranch would be done according to this condition.

g) Compliance with MHPA Management Recommendations

The MSCP Subarea Plan recognizes that management of the MHPA is critical to the overall success of the MSCP program, and that it must be done in a comprehensive fashion over the entire MHPA. The City MSCP subarea Plan states that the City will be responsible for and will continue the management and maintenance of its existing public lands at current levels. Lands obtained as mitigation through dedication or easement are include in the City's management responsibilities.

The MSCP Subarea Plan establishes both general and specific management priorities to be implemented when funding is available, although some may be implemented as development mitigation or through research efforts by the scientific and academic community. Both the general and specific management directives are prioritized with the first level of directives being required under the terms of the City's MSCP Implementing Agreement. Second and third priorities are more discretionary.

1. **General Management Directives.** These general directives apply to the entire preserve throughout the city. They address city-wide issues such as public access, trash removal, control of invasive exotics, and flood control.
2. **Specific Management Directives.** These are specific to Subarea III and address trail locations and requirements, coastal sage scrub monitoring, and specific requirements for fencing and detention basins and revegetation. These directives are also prioritized.

Those portions of the MHPA that are within Pacific Highlands Ranch would be dedicated to the City as development occurs. This is described in more detail in the Subarea Plan as is the relationship between MHPA conveyance and third-party beneficiary status. It is anticipated that the general Priority 1 management directives listed in the MSCP Subarea Plan and discussed below would be carried out by the City as agreed in the MSCP Implementing Agreement. Landowners within Pacific Highlands Ranch would not be responsible for any of the General Management Directives, and the City of San Diego would be responsible for management of lands conserved via dedication or the establishment of a conservation easement. A Habitat Management Plan would be prepared by the project applicant for lands dedicated as part of the MHPA and incorporated into the Subarea Plan. The plan would be implemented by the City.

Each of these priorities and their implementation by the proposed Pacific Highlands Ranch plans are discussed below:

Priority 1 Directive

1. Establish primary trail connections for equestrian and bicycle uses between Gonzales Canyon and Carmel Valley/McGonigle Canyon through or adjacent to

the more active, narrow linkage referred to as "Urban/Natural Amenity" in the Framework Plan.

Both Subarea Plans 1 and 2 accomplish this priority goal. Plan 1 includes a trail system within the open space system. The trail system includes hiking, biking, and equestrian trails that connect with pedestrian and bike paths within the built neighborhoods. One "Urban/Natural Amenity" area is located within the north-central portions of the subarea. This area is connected to Gonzales Canyon and is designed to connect with the southern portion of the subarea. Plan 2 also includes a trail system within open space and one "Urban/Natural Amenity" area which connects Gonzales Canyon with McGonigle and Deer Canyons.

Priority 2 Directives

1. Limit trails to the north side of the floodplain, adjacent to existing and proposed development in McGonigle Canyon, due to the physical constraints of the canyon for wildlife movement. Native plantings at the edges of the trail are desirable to shield the trail from both the development and the wildlife corridor area.
2. Provide fences or barriers along the edges of the shallow north/south-trending canyon that connects Carmel Valley to Gonzales Canyon to direct public access to appropriate locations. A trail on one side (only) of the canyon adjacent to development is preferred to a trail in the bottom of the canyon so that it does not obstruct animal movement. If a trail is placed inside this canyon, it should be limited to day use by pedestrians.

Both Subarea Plans 1 and 2 include a trail system which utilizes the north side of the McGonigle Canyon floodplain and the north-south trending Neighborhood Parkway between McGonigle Canyon and the Urban Amenity in Gonzales Canyon. Animals will not be restricted from using the bottoms of the canyons.

3. Monitor the coastal sage scrub areas in Gonzales Canyon for degradation and take necessary steps to halt and restore degrading areas. Design detention basins planned or constructed for development projects along Gonzales Canyon as natural basins. Clearly demarcate equestrian trails through this area.

Only natural detention basins will be constructed in Gonzales Canyon. All equestrian trails in the subarea will be clearly marked. Monitoring of coastal sage scrub is expected to be done by the City as part of the overall monitoring of the MSCP preserve.

Priority 3 Directives

Priority 3 includes five directives. The first is to restore disturbed areas to the appropriate native habitat over the long term, with riparian woodland species in the canyon bottoms, coastal sage scrub on south- and west-facing slopes, and chaparral on north-facing slopes within the Carmel Creek area, and McGonigle and Deer Canyons. The second is to remove eucalyptus trees and other invasive non-native species from the Preserve over the long term and replace them with native species. The third is to restore riparian trees and shrubs where McGonigle Canyon narrows due to the existing Rancho Glens Estates development. The fourth includes restoration of the Gonzales Canyon and the north/south-trending canyon that connects Carmel Valley to Gonzales Canyon to riparian, coastal sage scrub, and maritime chaparral habitats, as appropriate. And, finally, the fifth is to investigate the possibility of restoring the Gonzales Canyon floodplain to riparian woodland; to initiate cowbird trapping to prevent parasitism of gnatcatcher and other songbird nests; and to use natural detention basins in this area.

Revegetation, restoration, and cowbird trapping are all expected to be done by the City or other public agency as part of the overall management of the MSCP preserve, and as funds become available. Any detention basins that are necessary to control runoff and protect biologic and hydrologic resources will be allowed in the MHPA as will their routine cleaning.

NCFUA Framework Plan Management Concerns

Specific to the NCFUA, the MSCP Subarea Plan also incorporates Sections 5.4 and 5.5 of the Framework Plan, which address management concerns. The implementing principles cited in these sections address the management and enhancement of Environmental Tier lands and the location of roads in and adjacent to the Environmental Tier. The MSCP enlarges and improves upon the configuration of the Environmental Tier through the creation of the MHPA. As noted in the Pacific Highlands Ranch Plan, Section 5.4 and 5.5 were generally addressed and complied with. The exception is Section 5.4.a, requiring buffer zones and transition zones. Such zones are not required in the MSCP which enlarges and improves the old Environmental Tier.

h) Covered Species Special Conditions

Special management conditions apply for individual MSCP-covered species that occur within Pacific Highlands Ranch. These special conditions are identified below and discussed in more detail in the Biological Resources section of the MEIR.

Four MSCP-covered plant species occur within Pacific Highlands Ranch: Del Mar manzanita (*Arctostaphylos glandulosa* ssp. *crassifolia*), coast barrel cactus (*Ferocactus viridescens*), San Diego golden star (*Muilla clevelandii*), and wart-stemmed ceonothus (*Ceanothus verrucosus*) for which area special management conditions apply. These

include minimization of edge effects (all), minimization of recreational use impacts (manzanita and ceanothus), fire management, and prohibition of collection ~~and fire management~~ (coast barrel cactus). These plants all occur within preserve areas that are to be deeded to the City of San Diego or the San Dieguito River Park Joint Powers Authority for long-term management.

One reptile species, the orange-throated whiptail (*Cnemidophorus hyperythrus beldingi*), was observed within the subarea. Management actions directed to this species include using drought-tolerant plantings, restoration of coastal sage scrub, and discouraging frequent irrigation within and around the perimeter of the preserve and minimizing edge effects.

Two species of birds covered by the MSCP were observed: southern California rufous-crowned sparrow (*Aimophila ruficeps canescens*) and the California gnatcatcher (*Polioptila californica californica*). Of concern for each is avoidance of active nests and maintenance and/or restoration/revegetation of coastal sage scrub habitat. Any specific management conditions apply inside the MHPA and will be carried out by the City as part of the overall management of the MSCP. Specifically, restrictions for noise impacts on grading and construction of lands adjacent to the MHPA consistent with the MSCP Subarea Plan would be implemented during the gnatcatcher breeding season. Grading inside the MHPA preserve or within 100 feet of the MHPA is prohibited during gnatcatcher breeding season. Grading outside the MHPA is allowed year round.

Significance of Impacts

The Pacific Highlands Ranch Plan would provide for a preserve area that is functionally equivalent with the MHPA proposed in the adopted MSCP. No significant adverse effects to MSCP implementation would result through implementation of either Subarea Plan.

Mitigation, Monitoring, and Reporting

No mitigation would be required.

B. Traffic Circulation

The following discussion is based on the transportation analysis for the Future Urbanizing Subarea III prepared by Urban Systems Associates, Inc. (USA) in March 1998. The report is included as Appendix B.

Existing Conditions

Pacific Highlands Ranch consists of approximately 2,652 acres located in the northwestern portion of the city of San Diego, approximately one mile east of the city of Del Mar (see Figure 2-1). Generally, Pacific Highlands Ranch lies between I-5 and I-15 in the North City Future Urbanizing Area. Because the subarea is generally undeveloped, existing access to the site is minimal. Carmel Valley Road connects with Black Mountain Road to bisect the site in a southwest to the northeast direction and several small collector streets access residences and nurseries in the eastern portion of the subarea.

a) Regulatory Requirements

Proposed projects in the city of San Diego which generate long-term traffic are subject to applicable requirements of the San Diego County Congestion Management Program (CMP) and the City of San Diego Traffic Impact Study Manual.

The San Diego County CMP was developed by the San Diego Association of Governments (SANDAG) in response to California Proposition 111 (approved in June 1990) and is intended to directly link land use, transportation, and air quality through level of service performance criteria. The San Diego County CMP requires a detailed analysis of potential transportation-related impacts for all projects which generate more than 2,400 total average daily traffic (ADT) or 200 peak hour trips.

The City of San Diego Traffic Impact Study Manual requires analysis of potential transportation-related impacts based on conformance with applicable community plan land use and transportation elements, as well as associated trip generation. Specifically, projects which conform with the noted elements and generate more than 2,400 ADT or 200 peak hour trips (based on driveway rates) are required to conduct a traffic impact study. Projects which do not conform to local land use and transportation elements and generate more than 1,000 ADT (based on driveway rates) are also required to prepare a traffic impact study, with similar criteria as noted above for determining computer modeling requirements. If a project exceeds these thresholds and the cumulative traffic impacts of the project also exceed 2,400 ADT or 200 peak hour trips, then the traffic study must incorporate computer modeling, pursuant to City guidelines.

b) Existing Street Segment Levels of Service

Street system operating conditions are typically described in terms of level of service (LOS). LOS is expressed as a letter designation from A to F, with A representing the best operating conditions and F the worst. LOS "A" through "C" represent free flowing traffic, conditions with little or no delay. LOS "D" represents limited congestion and some delay; however, the duration of periods of delay are generally acceptable to most people. City of San Diego Traffic Manual states "The acceptable level of service standard for roadways and intersections in San Diego is level of service D."

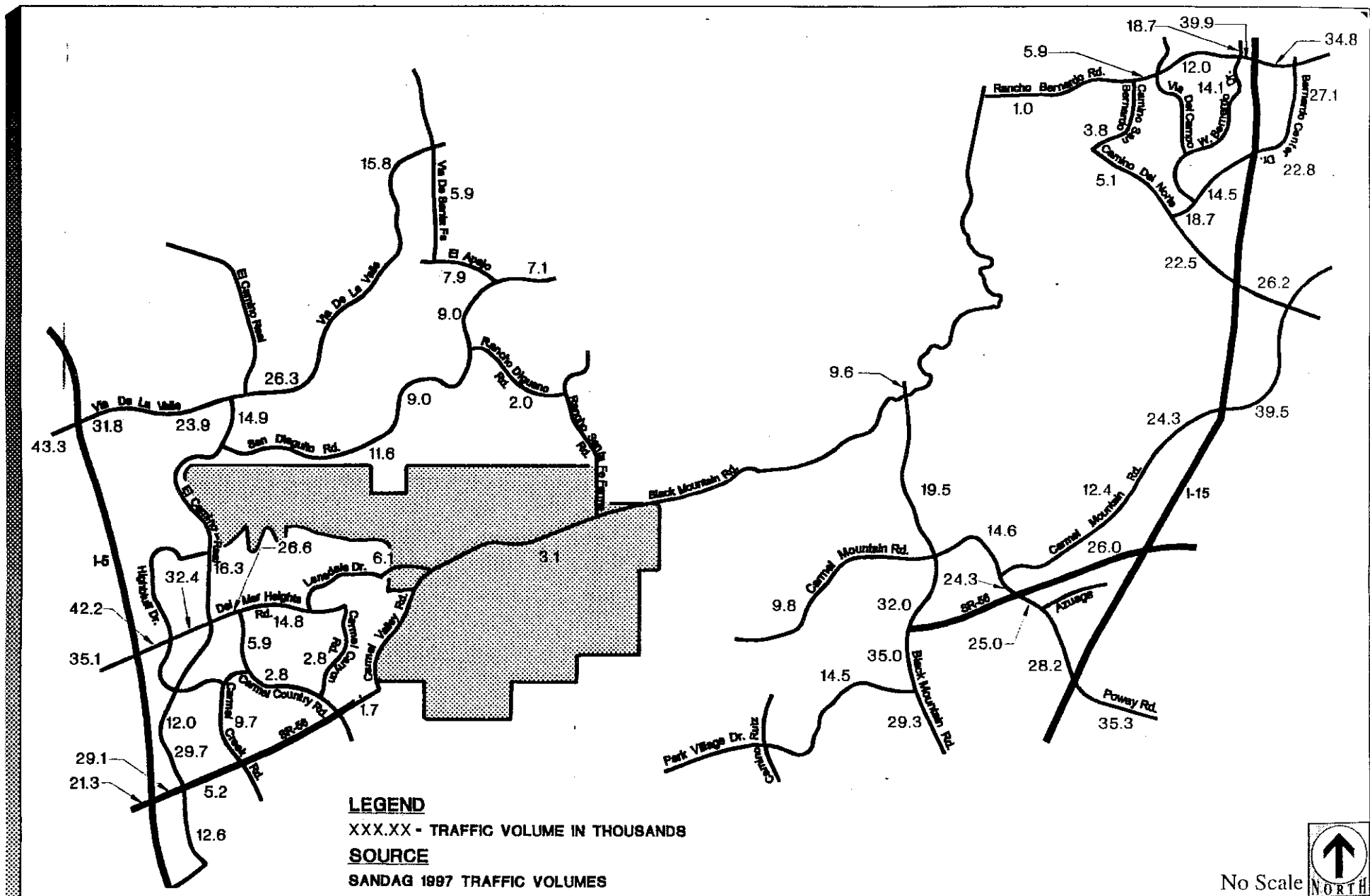
Figure 4B-1 depicts the existing circulation system, including the average daily traffic volumes, within the project area. Table 4B-1 gives an inventory of the existing roadway conditions. The source for existing street segment traffic volumes is SANDAG's *Book of Average Weekday Traffic Volumes* for years 1992-1996, dated May 1997. The SANDAG book is a compilation of current City, County, and State highway/freeway traffic volumes. Tables 4B-2 and 4B-3 give average daily vehicle trip thresholds corresponding to levels of service A through F for the various street classifications in the City and County of San Diego. Existing daily traffic volumes were evaluated against the applicable traffic volume thresholds to determine street segment LOS which are shown in Table 4B-4. The following segments were found to be operating below LOS D, i.e., E or F:

- Rancho Bernardo Road between West Bernardo Drive and Interstate 15
- El Camino Real between Via de la Valle and San Dieguito Road
- San Dieguito Road between El Camino Real and Rancho Dieguito Road
- Via de la Valle between San Andres and Via de Santa Fe (three segments)

c) Existing Peak Hour Conditions at Area Intersections

Existing peak hour operating conditions were evaluated for critical existing intersections. Table 4B-5 lists each intersection and its AM and PM peak hour LOS. Morning and afternoon peak hour volumes were obtained from the Black Mountain Ranch Subarea Traffic Impact Analysis dated November 1997. The intersection count data is included in Appendix B.

The Black Mountain Road/Park Village Road (#55) intersection currently operates at LOS E or F during the AM peak hour.



Source: Urban Systems 1997

FIGURE 4B-1
Existing Circulation System

Street/Segment	Classification	Design Volume ¹	Shoulders	Bike Lanes	Parking	# of lanes	Median	Posted Speed
Bernardo Center Drive								
North of Stargaze Avenue	Major	30,000	Improved	Both	No	4	Raised	45
Stargaze Avenue to Oviedo Street	Major	30,000	Improved	Both	No	4	Raised	45
Oviedo Street to Carmel Mountain Road	Major	30,000	Improved	W/S	E/S	4	Raised	35
Carmel Mountain Road to Pimpernel Drive	Major	30,000	Improved	Both	No	4	Raised	40
Pimpernel Drive to Twin Trails Drive	Major	30,000	Improved	Both	No	4	Raised	45
Twin Trails Drive to South of Twin Trails Drive	Major	30,000	Improved	Both	No	4	Raised	45
Black Mountain Road								
Interstate 15 to Camino del Norte	Major	30,000	Improved	Both	No	4	Raised	45
Camino del Norte								
Interstate 15 to Bernardo Center Drive	Primary Arterial	50,000	Improved	Both	No	6	Raised	35
Camino Ruiz								
North of Park Village Road	Major	15,000 ²	Improved	No	Both	1NB/2SB	Raised	None
South of Park Village Road	Major	10,000 ²	Improved	No	Both	2	Raised	None
Camino San Bernardo								
Camino del Norte to Rancho Bernardo Road	Major	30,000	Improved	Both	No	4	Raised	None
Carmel Canyon Road								
Del Mar Heights Road to Carmel Creek Road	Major	30,000	Improved	Both	No	4	Raised	45
Carmel Country Road								
Del Mar Heights Road to Carmel Creek Road	Major	30,000	Improved	Both	No	4	Raised	45
Carmel Creek Road to Carmel Canyon Road	Major	30,000	Improved	Both	No	4	Raised	None
Carmel Canyon Road to Carmel Valley Road					UNDER CONSTRUCTION			
Carmel Creek Road								
Carmel Country Road to Valley Centre Road	Major	30,000	Improved	Both	No	4	Raised	40
Valley Centre Drive to Carmel Valley Road					UNDER CONSTRUCTION			

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TABLE 4B-1
EXISTING AREA ROADWAYS
(continued)

Street/Segment	Classification	Design Volume ¹	Shoulders	Bike Lanes	Parking	# of lanes	Median	Posted Speed
Carmel Mountain Road								
Rancho Carmel Drive to Peñasquitos Drive	Major	50,000	Improved	Both	No	6	Raised	45
Peñasquitos Drive to Gerana Street		30,000	Improved	Both	No	4	Grade Separated	45
Gerana Street to Caminata de Luz	Major	30,000	Improved	No	Both	4	Raised	45
Via Rimini to Rancho Peñasquitos Boulevard	Major	30,000	Improved	Both	No	4	Raised	45
Rancho Peñasquitos Boulevard to Paseo Montalban	Major	30,000	Improved	No	No	4	Painted	40
Paseo Montalban to Paseo Valdear	Major	30,000	Improved	No	No	4	Raised	40
Paseo Valdear to Black Mountain Road	Major	30,000	Improved	Both	No	4	Raised	40
Black Mountain Road to Sundance Avenue	Major	30,000	Improved	No	Both	4	Raised	40
Carmel Valley Road/State Route 56								
Interstate 5 to El Camino Real	Major	30,000	Improved	No	No	2WB/3EB	Raised	None
El Camino Real South to El Camino Real North	Major	30,000	Improved	No	No	4	None	None
El Camino Real North to Carmel Creek Road	Freeway	60,000	Improved	No	No	4	Divided	None
Carmel Creek Road to Carmel Country Road	Freeway	60,000	Improved	No	No	4	Divided	None
Carmel Country Road to Black Mountain Road	Freeway	60,000	Improved	No	No	4	Divided	None
Del Mar Heights Road								
Interstate 5 to High Bluff Drive	Prime	50,000	Improved	Both	No	6	Raised	45
High Bluff Drive to El Camino Real	Prime	50,000	Improved	Both	No	6	Raised	45
El Camino Real to Carmel Country Road	Prime	50,000	Improved	Both	No	6	Raised	40
Carmel Country Road to Carmel Canyon Road	Prime	50,000	Improved	Both	No	6	Raised	45
El Apajo								
Via de Santa Fe to San Dieguito Road	Collector	9,500	Unimproved	No	No	2	None	45

REVISED
TABLE 4B-1
EXISTING AREA ROADWAYS
(continued)

Street/Segment	Classification	Design Volume ¹	Shoulders	Bike Lanes	Parking	# of lanes	Median	Posted Speed
El Camino Real (North)								
North of Via de la Valle	Collector	7,500	Unimproved	N. Side	No	2	None	None
Via de la Valle to San Dieguito Road	Collector	7,500	Unimproved	No	No	2	None	40
San Dieguito Road to Halfmile Drive	Collector	7,500	Unimproved	Both	No	2	None	50
Halfmile Drive to Del Mar Heights Road	Major	30,000	Improved	Both	No	4	Raised	45
Del Mar Heights Road to High Bluff Drive	Major	40,000	Improved	Both	No	6 ³	Raised	45
High Bluff Drive to Valley Centre Drive	Major	40,000	Improved	Both	No	6	Raised	45
Valley Centre Drive to Carmel Valley Road	Major	40,000	Improved	Both	No	6	Raised	45
El Camino Real (South)								
South of Carmel Valley Road	Collector	7,500	Unimproved	No	No	2	None	None
Park Village Road								
Black Mountain Road to Rumex Lane	Major	30,000	Improved	Both	No	4	Raised	45
Rumex Lane to Darkwood Road	Major	30,000	Improved	Both	No	4	Painted	45
Darkwood Road to Camino Ruiz	Major	30,000	Improved	N/S	S/S	4	Raised	45
Rancho Bernardo Road								
Interstate 15 to West Bernardo Drive	Major	30,000	Improved	Both	No	4	Raised	None
West Bernardo Drive to Camino San Bernardo	Major	30,000	Improved	Both	No	4	Raised	None
Rancho Santa Fe Farms Road								
San Dieguito Road to Black Mountain Road	Collector	7,500	Unimproved	No	Both	2	None	40
Rancho Diegueno Road								
Rancho Santa Fe Farms Rd. to San Dieguito Road	Rural Light Collector	7,100	Improved	No	Both	2	None	40

REVISED
TABLE 4B-1
EXISTING AREA ROADWAYS
(continued)

Street/Segment	Classification	Design Volume ¹	Shoulders	Bike Lanes	Parking	# of lanes	Median	Posted Speed
Rancho Peñasquitos Boulevard								
Interstate 15 to Calle de las Rosas	Major	30,000	Improved	No	No	4	Raised	None
Calle de las Rosas to Azuaga Street	Major	30,000	Improved	No	Both	4	Raised/ Painted	None
Azuaga Street to Carmel Mountain Road	Major	30,000	Improved	No	No	4	Painted	None
Camino San Bernardo – Alva Road	Major	30,000	Improved	Both	No	4	Raised	None
San Dieguito Road								
East of El Apajo	Collector	7,100	Improved	No	Yes	2	None	None
El Apajo to Camino Santa Fe	Collector	27,400	Improved	Both	No	4	Painted	45
Camino Santa Fe to El Camino Real	Collector	7,100	Improved	Both	No	2	None	55
Via de la Valle								
Interstate 5 to San Andreas Drive	Major	30,000	Improved	Both	Both ⁴	4	Raised	None
San Andreas Drive to El Camino Real	Collector	7,100	Unimproved	No	No	2	None	50
El Camino Real to Via de Santa Fe	Collector	7,100	Varies	No	Both	2	None	45
West Bernardo Drive								
Rancho Bernardo Road to Bernardo Center Drive	Collector	15,000	Improved	Both	No	4	None	45

¹Recommended maximum volume given in the City of San Diego Street Design Manual.

²Design volume was estimated for non-standard cross section.

³Varies on the east side from one to three lanes.

⁴Limited.

TABLE 4B-2
CITY OF SAN DIEGO LEVEL OF SERVICE THRESHOLDS

Street Classification	No. of Lanes	Cross Sections	Level of Service				
			A (.50)	B (.70)	C (1.00)	D (1.1-1.3)	E (1.2-1.6)
Freeway	8		60,000	84,000	120,000	140,000	150,000
Freeway	6		45,000	63,000	90,000	100,000	120,000
Freeway	4		30,000	42,000	60,000	70,000	80,000
Expressway	6	102/122	30,000	42,000	60,000	70,000	80,000
Prime Arterial	6	102/122	25,000	35,000	50,000	55,000	60,000
Major Arterial	6	102/122	20,000	28,000	40,000	45,000	50,000
Major Arterial	4	78/98	15,000	21,000	30,000	35,000	40,000
Collector	4	72/92	7,500	10,500	20,000	25,000	30,000
Collector (no center lane) (continuous left-turn lane)	4 2	64/84 52/72	5,000	7,000	10,000	13,000	15,000
Collector (no fronting property)	2	40/60	4,000	5,500	7,500	9,000	10,000
Collector (commercial-industrial fronting)	2	50/70	2,500	3,500	5,000	6,500	8,000
Collector (multi-family)	2	40/60	2,500	3,500	5,000	6,500	8,000
Collector (single-family)	2	40/60		--	2,200	--	--

SOURCE: Urban Systems Associates Inc. 1997.

NOTE: The volumes and the average daily level of service listed above are only intended as a general planning guideline. Levels of service are not applied to residential streets since their primary purpose is to serve abutting lots, not carry through traffic. Levels of service normally apply to roads carrying through traffic between major trip generators and attractors.

Legend:

xxx/xxx = curb-to-curb width (feet/right-of-way width (feet): based on the City of San Diego Street Design Manual.

xx,xxx = approximate recommended ADT based on the City of San Diego Street Design Manual.

TABLE 4B-3
COUNTY OF SAN DIEGO LEVEL OF THRESHOLDS

Class	X-Section	Level of Service				
		A	B	C	D	E
Circulation Element Roads						
Expressway	126/146	<36,000	<54,000	<70,000	<86,000	<108,000
Prime Arterial	102/122	<22,200	<37,000	<44,600	<50,000	<57,000
Major Road	78/98	<14,800	<24,700	<29,600	<33,400	<37,000
Collector	64/84	<13,700	<22,800	<27,400	<30,800	<34,200
Light Collector	40/60	<1,900	<4,100	<7,100	<10,900	<16,200
Rural Collector	40/84	<1,900	<4,100	<7,100	<10,900	<16,200
Rural Light Collector	40/60	<1,900	<4,100	<7,100	<10,900	<16,200
Recreational Parkway	40/100	<1,900	<4,100	<7,100	<10,900	<16,200
Rural Mountain	40/100	<1,900	<4,100	<7,100	<10,900	<16,200
Non-Circulation Element Roads						
Residential Collector	40/60	*	*	<4,500	*	*
Residential Road	36/56	*	*	<1,500	*	*
Residential Cul-de-Sac or Loop Road	32/52	*	*	<200	*	*

SOURCE: Urban Systems Associates Inc. 1997.

*Levels of service are not applied to residential streets since their primary purpose is to serve abutting lots, not carry through traffic. Levels of service normally apply to roads carrying through traffic between major trip generators and attractors.

**TABLE 4B-4
EXISTING STREET SEGMENT LEVELS OF SERVICE**

Street/Segment	Class	LOS C Volume ¹	Existing ADT ²	LOS ³
Bernardo Center Drive				
Rancho Bernardo Road to Bernardo Hts. Pkwy.	4-lane Major	30,000	27,100	C
Bernardo Hts. Pkwy to I-15	4-lane Major	30,000	22,800	C
I-15 to West Bernardo Drive	4-lane Major	30,000	14,500	A
West Bernardo Drive to Camino del Norte	4-lane Major	30,000	18,700	B
Black Mountain Road				
North of Oviedo Street	4-lane Major	30,000	9,600	A
Oviedo Street to Carmel Mountain Road	4-lane Major	30,000	19,500	B
Carmel Mountain Road to Paseo Montalban	4-lane Major	30,000	11,300	A
Paseo Montalban to Twin Trails Drive	4-lane Major	30,000	12,400	A
Twin Trails Drive to SR-56	4-lane Major	30,000	32,000	D
SR-56 to Park Village Road	4-lane Major	30,000	35,000	D
Park Village Road to Mercy Road	4-lane Major	30,000	29,300	C
Camino del Norte				
I-15 to Bernardo Center Drive	6-lane Primary Arterial	50,000	22,500	A
Bernardo Center Drive to Camino San Bernardo	4-lane Major	30,000	5,100	A
Camino San Bernardo				
Camino del Norte to Rancho Bernardo Road	4-lane Major	30,000	3,800	A
Carmel Creek Road				
SR-56 (Carmel Valley Rd.) to Carmel Country Rd.	4-lane Major	30,000	9,700	A
Carmel Country Road				
Del Mar Heights Road to Carmel Creek Road	4-lane Major	30,000	5,800	A
Carmel Creek Road to SR-56 (Carmel Valley Road)	4-lane Major	30,000	2,800	A
Carmel Mountain Road				
I-15 to Peñasquitos Drive	6-lane Primary Arterial	50,000	24,500	A
Peñasquitos Drive to Rancho Peñasquitos Blvd.	4-lane Major	30,000	12,400	A
Rancho Peñasquitos Boulevard to Paseo Montalban	4-lane Major	30,000	24,800	C

TABLE 4B-4
EXISTING STREET SEGMENT LEVELS OF SERVICE
(continued)

Street/Segment	Class	LOS C Volume ¹	Existing ADT ²	LOS ³
Paseo Montalban to Paseo Valdear	4-lane Major	30,000	14,600	A
Paseo Valdear to Black Mountain Road	4-lane Major	30,000	15,000	B
Black Mountain Rd. to East of Black Mountain Rd.	4-lane Major	30,000	6,000	A
Carmel Valley Road (SR-56)				
I-5 to El Camino Real	4-lane Major	30,000	26,600	C
El Camino Real to Carmel Creek Road	4-lane Freeway	60,000	14,700	A
Carmel Creek Road to Carmel Country Road	4-lane Freeway	60,000	4,500	A
Carmel Country Road to Rancho Santa Fe Road	2-lane Collector	10,000	3,100	A
Del Mar Heights Road				
I-5 to High Bluff Drive	6-lane Primary Arterial	50,000	42,200	C
High Bluff Drive to El Camino Real	6-lane Primary Arterial	50,000	35,100	C
El Camino Real to Carmel Country Road	6-lane Primary Arterial	50,000	26,600	B
Carmel Country Rd. to Lansdale	6-lane Primary Arterial	50,000	14,800	A
El Apajo				
Via de Santa Fe to San Dieguito Road	2-lane Collector	7,500	7,900	D
El Camino Real				
Carmel Mountain Road to SR-56	6-lane Major	40,000	12,000	A
SR-56 to High Bluff Drive	6-lane Major	40,000	29,700	A
High Bluff Drive to Del Mar Heights Road	6-lane Major	40,000	9,500	A
Del Mar Heights Road to Quarter Mile Drive	4-lane Major	30,000	16,300	B
Quarter Mile Drive to Half Mile Drive	4-lane Major	30,000	11,600	A
San Dieguito Road to Via de la Valle	2-lane Collector	7,500	14,900	F
Park Village Road				
Black Mountain Rd. to Camino Ruiz	4-lane Major	30,000	14,500	A
Rancho Bernardo Road				
Bernardo Center Drive to I-15	4-lane Major	30,000	34,800	D
I-15 to West Bernardo Dr.	4-lane Major	30,000	39,900	E

TABLE 4B-4
EXISTING STREET SEGMENT LEVELS OF SERVICE
 (continued)

Street/Segment	Class	LOS C Volume ¹	Existing ADT ²	LOS ³
West Bernardo Dr. to Via del Campo	4-lane Major	30,000	12,000	A
Via del Campo to Camino San Bernardo	4-lane Major	30,000	5,900	A
Camino San Bernardo to Alva Road	4-lane Major	30,000	2,000	A
Alva Road to Black Mountain Road	2-lane Collector	7,500	1,000	A
Rancho Peñasquitos Boulevard				
I-15 to Via del Sud	4-lane Major	30,000	31,600	D
Via del Sud to SR-56	4-lane Major	30,000	25,600	C
SR-56 to Carmel Mountain Road	4-lane Major	30,000	32,100	D
Rancho Santa Fe Farms Road				
San Dieguito Road to Black Mountain Road	2-lane Collector	7,500	2,000	A
San Dieguito Road				
El Apajo to Camino Santa Fe	4-lane Collector	20,000	9,000	A
Camino Santa Fe to El Camino Real	2-lane Collector	7,500	11,600	F
Via de Santa Fe				
Via de la Valle to El Apajo	2-lane Collector	7,500	6,900	C
Via de la Valle				
I-5 to San Andres Drive	4-lane Major	30,000	31,800	D
San Andres Drive to El Camino Real	2-lane Collector	7,500	23,900	F
El Camino Real to Via Santa Fe	2-lane Collector	7,500	26,300	F
West Bernardo Drive				
Rancho Bernardo Road to Bernardo Center Drive	4-lane Collector	20,000	14,100	C

¹Refer to Table 2.

²SOURCE: Black Mountain Ranch Subarea Plan Traffic Impact Analysis, 11/97, Katz, Okitsu and Assoc.; SANDAG 1997 Book of Traffic Volumes

³Based on daily traffic volume thresholds given in Table 2.

**TABLE 4B-5
EXISTING INTERSECTION AM/PM PEAK HOUR LEVELS OF SERVICE**

Key Number ¹	Intersection	A.M. Peak Hour		P.M. Peak Hour	
		Delay ²	LOS ³	Delay ²	LOS ³
1	I-15 NB ramps/Rancho Bernardo Road	6	B	8.3	B
2	I-15 SB ramps/Rancho Bernardo Road	12.9	B	9.7	B
3	Bernardo Center Dr./I-15 NB ramps	31.0	D	85.1	F
4	Bernardo Center Dr./I-15 SB ramps	14.5	B	14.5	B
5	I-15 NB ramps/Camino del Norte	18.3	C	18.3	C
6	I-15 SB ramps/Camino del Norte	15.5	C	24.2	C
7	Bernardo Center Drive/Camino del Norte	8.3	B	11.6	B
8	Bernardo Center Drive/West Bernardo Drive	52.0	E	12.0	B
9	Rancho Bernardo Road/West Bernardo Dr.	16.6	C	24.9	C
10	Camino San Bernardo/Rancho Bernardo Rd.	10.5	B	9.6	B
11	Camino del Norte/Camino San Bernardo	7.1	B	7.3	B
12	Camino del Norte/Rancho Bernardo Road		FUTURE INTERSECTION		
13	Carmel Valley Road/Rancho Bernardo Road		FUTURE INTERSECTION		
14	Black Mountain Road/Carmel Valley Road		FUTURE INTERSECTION		
15	Camino del Norte/Resort Road		FUTURE INTERSECTION		
16	Camino del Norte/Camino Ruiz		FUTURE INTERSECTION		
17	Camino Ruiz/Resort Road		FUTURE INTERSECTION		
18	Camino Ruiz/San Dieguito Road		FUTURE INTERSECTION		
19	Camino Ruiz/Street "A" (north)		FUTURE INTERSECTION		
20	Camino Ruiz/Street "A" (south)		FUTURE INTERSECTION		
21	El Apajo/San Dieguito Road	.75	B	7.3	B
22	Via de la Valle/Via de Santa Fe	N/A ⁴	A	N/A ⁴	B
23	Camino Diegueno Road/San Dieguito Road	6.7	B	7.6	B
24	El Camino Real/Via de la Valle (east)	N/A ⁴	A	N/A ⁴	A
25	El Camino Real/Via de la Valle (west)	12.1	B	15.6	C
26	El Camino Real/San Dieguito Road	10.8	B	30.6	D
27	I-5 NB ramps/Via de la Valle	8.4	B	9.8	B
28	I-5 SB ramps/Via de la Valle	7.2	B	7.3	B
29	Del Mar Heights Road/I-5 NB ramps	15.9	C	22.0	C
30	Del Mar Heights Road/I-5 SB ramps	8.3	B	9.9	B
31	I-5 NB ramps/SR-56 (Carmel Valley Road)	7.6	B	8.7	B
32	I-5 SB ramps/SR-56 (Carmel Valley Road)	9.1	B	10.2	B

TABLE 4B-5
EXISTING INTERSECTION AM/PM PEAK HOUR LEVELS OF SERVICE
(continued)

Key Number ¹	Intersection	A.M. Peak Hour		P.M. Peak Hour	
		Delay ²	LOS ³	Delay ²	LOS ³
33	Carmel Mountain Road/I-5 NB ramps		FUTURE INTERSECTION		
34	Carmel Mountain Road/I-5 SB ramps		FUTURE INTERSECTION		
35	Carmel Mountain Road/El Camino Real		FUTURE INTERSECTION		
36	El Camino Real (south)/SR-56 (Carmel Valley Road)	9.2	B	8.3	B
37	El Camino Real (north)/SR-56 (Carmel Valley Road)	9.1	B	8.3	B
38	Carmel Creek Rd./SR-56 WB ramps (Carmel Valley Rd.)	0.37	B	0.39	B
39	Carmel Creek Road/Carmel Country Road	0.36	B	0.33	B
40	Carmel Country Road/Del Mar Heights Rd.	0.27	A	0.28	A
41	El Camino Real/Highbluff Drive	0.29	A	0.39	B
42	Del Mar Heights Road/Highbluff Drive	0.59	B	0.65	C
43	Del Mar Heights Road/El Camino Real	11.1	B	12.6	B
44	Carmel Country Road/Carmel Mountain Rd.		FUTURE INTERSECTION		
45	Camino Santa Fe Road/SR-56 EB ramps		FUTURE INTERSECTION		
46	Camino Santa Fe Road/SR-56 WB ramps		FUTURE INTERSECTION		
47	Carmel Valley Road/Del Mar Heights Road		FUTURE INTERSECTION		
48	Camino Ruiz/Park Village Road	0.16	A	0.14	A
49	Camino Ruiz/SR-56 EB ramps		FUTURE INTERSECTION		
50	Camino Ruiz/SR-56 WB ramps		FUTURE INTERSECTION		
51	Camino Ruiz/Carmel Valley Road		FUTURE INTERSECTION		
52	Black Mountain Road/Carmel Mountain Rd.	12.3	B	11.0	B
53	Black Mountain Road/SR-56 WB ramps	15.0	C	18.2	C
54	Black Mountain Road/SR-56 EB ramps	5.2	B	6.8	B
55	Black Mountain Road/Park Village Road	42.8	E	22.3	C
56	Carmel Mountain Rd./Rancho Penasquitos Blvd.	0.78	D	0.79	D
57	Rancho Penasquitos Bl./SR-56 WB ramps	11.2	B	23.8	C
58	Rancho Penasquitos Blvd./SR-56 EB ramps/ Azuaga Street	11.4	B	6.8	B
59	Azuaga Street/Rancho Penasquitos Boulevard		NOT APPLICABLE		
60	I-15 SB ramps/Rancho Penasquitos Blvd.	1.90	A	4.82	A
61	I-15 NB ramps/Poway Road	9.36	B	12.02	B

TABLE 4B-5
EXISTING INTERSECTION AM/PM PEAK HOUR LEVELS OF SERVICE
(continued)

Key Number ¹	Intersection	A.M. Peak Hour		P.M. Peak Hour	
		Delay ²	LOS ³	Delay ²	LOS ³
62	I-15 SB ramps/SR-56 (Ted Williams Parkway)	2.4	A	3.9	A
63	I-15 NB ramps/Ted Williams Parkway	10.6	B	21.6	
64	Carmel Mountain Road/I-15 SB ramps	10.4	B	9.59	B
65	Carmel Mountain Road/I-15NB ramps	7.52	B	10.42	B
66	Carmel Country Road/SR-56 EB ramps		FUTURE INTERSECTION		
67	Carmel Country Road/SR-56 WB ramps		FUTURE INTERSECTION		
68	Camino Santa Fe/Shaw Ridge Road		FUTURE INTERSECTION		
69	Carmel Valley Rd./Rancho Santa Fe Farms Rd.	1.9	A	1.6	A
70	Carmel Creek Rd./SR-56 EB ramps (Carmel Valley Rd.)		FUTURE INTERSECTION		
71	Carmel Country Road/Shaw Ridge Road		FUTURE INTERSECTION		
72	Camino Ruiz/Carmel Mountain Road		FUTURE INTERSECTION		
73	Rancho Bernardo Road/Bernardo Center Rd.	12.9	B	15.6	C
74	Carmel Valley Road/Third Internal Connection		FUTURE INTERSECTION		
75	Rancho Bernardo Road/Via del Campo	9.6	B	9.6	B

¹See Figure 3 for location of existing intersections.

²Level of service is measured in terms of delay (average delay per vehicle in seconds) and evaluated in accordance with the 1995 Highway Capacity Manual. Criteria for signalized intersections is as follows:

<u>Delay (seconds)</u>	<u>Level of Service</u>
≤ 5.0	A
>5.0 and ≤ 15.0	B
>15.0 and ≤ 25.0	C
>25.0 and ≤ 40.0	D
>40.0 and ≤ 60.0	E
≥ 60.0	F

³LOS = level of service.

⁴Not applicable. Intersection is unsignalized. Highway Capacity Manual method for evaluation of unsignalized intersections was used. Level of service is for critical minor approach.

d) Existing Freeway Segment Levels of Service

Existing area freeway segments' LOS are shown in Table 4B-6. Interstate 5 south of SR-56 and I-15 from north of Rancho Bernardo Road to south of Poway Road operate at LOS F or lower during peak hours.

e) Ramp Meter Operations

Ramp meters are presently installed on most of the freeway ramps in the study area. The Caltrans book of Traffic Volumes for California State Highways in District 11 from 1983-1996 is the source for ramp volumes and peak hour meter rates used in this report. The maximum peak hour delay in minutes was estimated by calculating the excess demand, which is the difference between the meter flow rate and the peak hour demand, and then calculating the time required for excess demand to pass the ramp meter location (based on the Caltrans meter flow rate). The Caltrans method for determining the maximum queue length is calculated by multiplying the excess demand (number of vehicles) by 29 feet per vehicle to arrive at the length in feet for the entire queue. Table 4B-7 summarizes the results of this analysis.

Traffic Circulation Issues

1. What direct and/or cumulative traffic impacts would the project have on the existing and planned community and regional circulation networks?

1) Issue

What direct and/or cumulative traffic impacts would the project have on the existing and planned community and regional circulation networks?

Impacts

a) Project Trip Generation

There are two land use scenarios for Pacific Highlands Ranch because of the uncertainties regarding the alignment of SR-56 through the project site. As such, two separate land use plans have been developed which incorporate the two preferred alignments for SR-56. Table 4B-8 shows the trip generation for both the proposed land use plans. Project trip generation is based on City of San of San Diego trip generation rates.

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TABLE 4B-6
FREEWAY SEGMENT LOS

Segment	# of Lanes (one-way)	Capacity	ADT	Peak %	Direction	Truck	Peak Volume	V/C	LOS
I-5									
Lomas Santa Fe Dr./Via de la Valle	4	9,200	195,500	0.082	0.57	0.92	9,932	1.08	F
Via de la Valle/Del Mar Heights Rd.	5	11,500	208,000	0.082	0.57	0.92	10,567	0.92	D
Del Mar Heights Rd./Carmel Valley Rd.	5	11,500	210,000	0.082	0.57	0.92	10,669	0.93	E
Carmel Valley Rd./I-805	4	9,200	224,600	0.075	0.55	0.97	9,551	1.04	F0
I-15*									
Pomerado Dr./Ranch Bernardo Rd.	4	9,200	224,600	0.087	0.58	0.92	12,319	1.34	F1
Ranch Bernardo Rd./Bernardo Center Dr.	4	9,200	183,000	0.088	0.59	0.92	10,328	1.12	F0
Bernardo Center Dr./Camino del Norte	4	9,200	183,500	0.088	0.59	0.92	10,469	1.14	F0
Camino del Norte/Carmel Mountain Rd.	4	9,200	193,500	0.088	0.61	0.92	11,290	1.23	F0
Carmel Mountain Rd./SR-56	4	9,200	204,300	0.087	0.61	0.92	11,785	1.28	F1
SR-56/Poway Road	4	9,200	174,200	0.087	0.61	0.92	10,049	1.09	F0
Poway Road/Mercy Road	4	9,200	197,800	0.087	0.61	0.92	11,410	1.24	F0
SR-56									
El Camino Real/Carmel Creek Road	2	4,600	5,200	0.098	0.57	0.985	295	0.06	A
Carmel Creek Road/Carmel Country Rd.	2	4,600	4,300	0.098	0.57	0.985	244	0.05	A
Black Mountain Rd./Rancho Penasquitos Blvd.	2	4,600	21,400	0.099	0.55	0.985	1,183	0.26	A
Rancho Penasquitos Blvd./I-15	2	4,600	26,000	0.099	0.55	0.985	1,437	0.31	A

SOURCE: Caltrans 1997 Traffic Volumes.

V/C = volume to capacity ratio

*Without HOV lane volumes

**TABLE 4B-7
EXISTING PEAK HOUR RAMP METERING DELAYS**

Location	Peak	Demand	Flow	Excess Demand	Delay (minutes)	Queue (feet)
I-5 NB/Via de la Valle	PM WB	443	450	0	0.0	0
I-5 NB/Via de la Valle	PM EB	432	450	0	0.0	0
I-5 SB/Via de la Valle	AM WB	494	540	0	0.0	0
I-5 SB/Via de la Valle	AM EB	785	750	35	2.8	1,015
I-5 NB/Del Mar Heights Road	PM	1,158	1,050	108	6.2	3,132
I-5 NB/Del Mar Heights Road	AM WB	912	850	62	4.4	1,798
I-5 NB/Del Mar Heights Road	AM EB	676	680	0	0.0	0
I-5 NB/Carmel Valley Road	PM	675	700	0	0.0	0
I-5 SB/Carmel Valley Road	AM	1,213	1,100	113	6.2	3,277
I-15 SB/Rancho Bernardo Road	AM EB	680	700	0	0.0	0
I-15 SB/Rancho Bernardo Road	AM WB	479	500	0	0.0	0
I-15 NB/Rancho Bernardo Road	PM EB	784	800	0	0.0	0
I-15 NB/Rancho Bernardo Road	PM WB	518	550	0	0.0	0
I-15 SB/Bernardo Center Road	AM	532	550	0	0.0	0
I-15 NB/ Bernardo Center Road	PM	511	550	0	0.0	0
I-15 SB/Camino del Norte	AM	923	1,100	0	0.0	0
I-15 NB/Camino del Norte	PM	819	850	0	0.0	0
I-15 SB/Carmel Mountain Road	AM	1,239	1,143	96	5.0	2,784
I-15 NB/Carmel Mountain Road	PM	612	650	0	0.0	0
I-15 SB/SR-56	AM	527	450	77	10.3	2,233
I-15 NB/SR-56	PM	907	907	0	0.0	0

SOURCE: Caltrans 1997.

NB = northbound

SB = southbound

EB = eastbound

WB = westbound

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TABLE 4B-8
PROPOSED PROJECT TRIP GENERATION

Subarea Plan 1				A.M. Peak Hour					P.M. Peak Hour				
Use	Intensity	Trip Rate	ADT	%	Peak-Hour Traffic	In/Out Split*	In	Out	%	Peak-Hour Traffic	In/Out Split*	In	Out
Single-family du	3,243 du	10/du	32,430	8	2,594	2:8	519	2,076	10	3,244	7:3	2,271	973
Multi-family du	1,273 du	8/du	10,184	8	815	2:8	163	652	10	1,019	7:3	714	306
Multi-family du	500 du	8/du	3,000	8	240	2:8	48	192	10	301	7:3	211	90
Park	30 ac	50/ac	1,500	4	60	5:5	30	30	8	120	5:5	60	60
Elementary school	20 ac	60/ac	1,200	26	312	6:4	187	125	5	60	3:7	18	42
High school	48 ac	50/ac	2,400	20	480	8:2	384	96	14	336	3:7	101	235
High school (private)	50 ac	50/ac	2,500	20	500	8:2	400	100	14	350	3:7	105	245
Neighbor. Commercial**	150 KSF	120/KSF	18,000	4	720	6:4	432	288	11	1,980	5:5	990	990
Office	150 KSF	20/KSF	3,000	13	390	9:1	351	39	14	420	2:8	84	336
Office	14 ac	450/ac	6,300	13	819	9:1	737	82	14	882	2:8	176	706
Civic	4 ac	50/ac	175	2	4	8:2	3	1	10	18	5:5	9	9
TOTAL	5,016 du		80,689		6,934		3,254	3,681		8,730		4,739	3,992

Subarea Plan 2				A.M. Peak Hour					P.M. Peak Hour				
Use	Intensity	Trip Rate	ADT	%	Peak-Hour Traffic	In/Out Split*	In	Out	%	Peak-Hour Traffic	In/Out Split*	In	Out
Single-family du	3,069 du	10/du	30,690	8	2,455	2:8	491	1,964	10	3,070	7:3	2,149	921
Multi-family du	1,341 du	8/du	10,728	8	858	2:8	172	687	10	1,074	7:3	752	322
Multi-family du	500 du	6/du	3,000	8	240	2:8	48	192	10	301	7:3	211	90
Park	30 ac	50/ac	1,500	4	60	5:5	30	30	8	120	5:5	60	60
Elementary school	20 ac	60/ac	1,200	26	312	6:4	187	125	5	60	3:7	18	42
High school	48 ac	50/ac	2,400	20	480	8:2	384	96	14	356	3:7	101	235
High school (private)	50 ac	50/ac	2,500	20	500	8:2	400	100	14	350	3:7	105	245
Neighbor. Commercial**	150 ac	72/ac	10,800	4	432	6:4	259	173	11	1,188	5:5	594	594
Office	150 KSF	20/ac	3,000	13	390	9:1	351	39	14	420	2:8	84	336
Office	17 ac	450/ac	7,650	13	995	9:1	895	99	14	1,071	2:8	214	857
Civic	4 ac	50/ac	200	2	4	8:2	3	1	10	20	5:5	10	10
TOTAL	4,910		80,868		7,014		3,393	3,621		8,802		4,693	4,108

du = dwelling unit; ac = acre

*City of San Diego.

**Neighborhood Cumulative Commercial rate is 72 trips per 1,000 square feet or a 40% reduction.

b) Cumulative Impacts

To determine future (cumulative) traffic impacts, computer travel forecasts were based on the SANDAG Series 8 traffic forecasting methodology and land use information developed by SANDAG. In addition, the cumulative forecasts assume the buildout of Carmel Valley, Torrey Hills, the Future Urbanizing area, 4S Ranch, and Santa Fe Valley. Following is an analysis of the potential transportation impacts which would result from implementing either Subarea Plan 1 or 2.

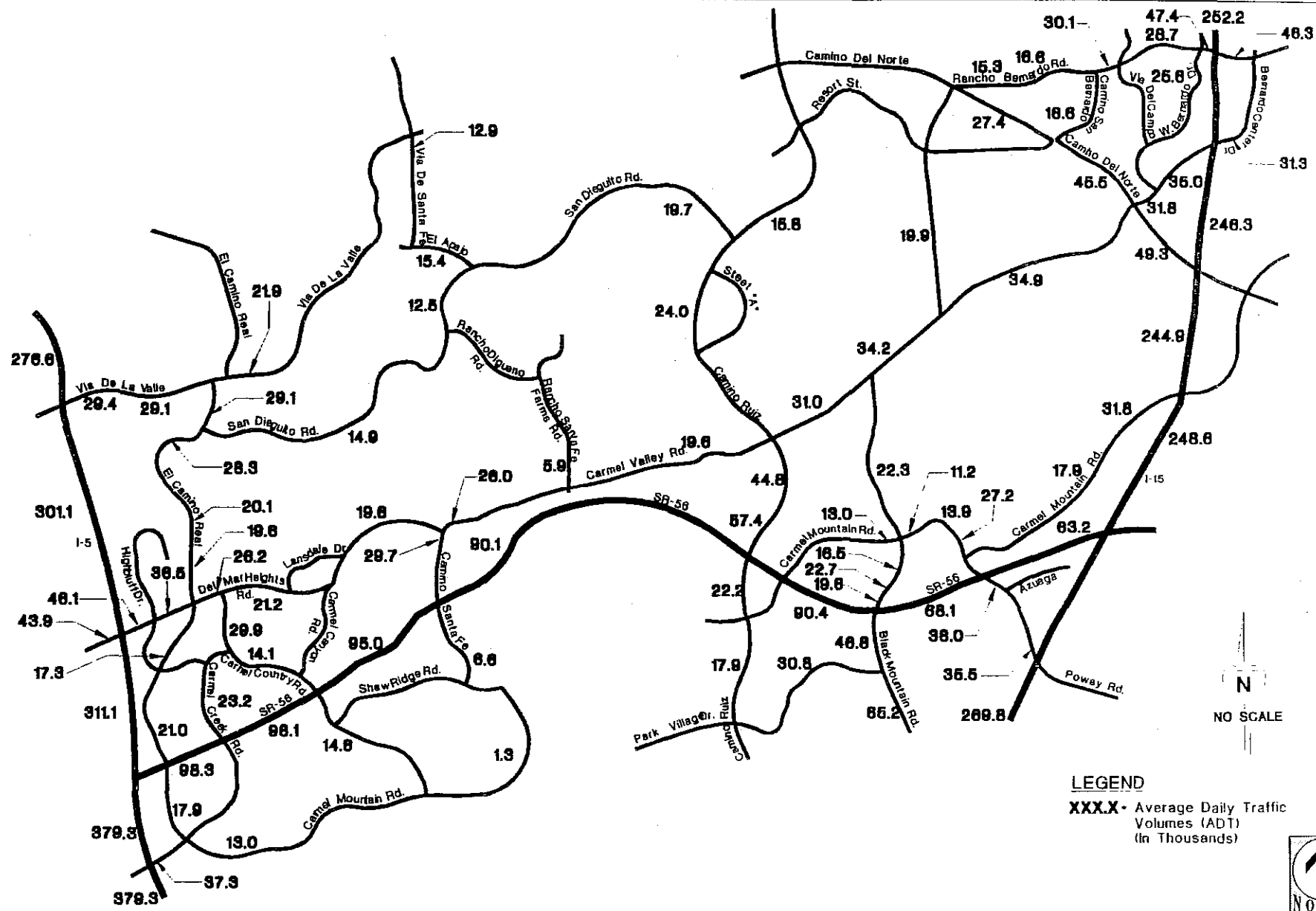
Subarea Plan 1 (SR-56 Alignment "F"). As shown in Table 4B-8, the total ADT for Subarea Plan 1 is 80,689 trips. As also shown, the project is estimated during the AM peak hour to generate 6,934 trips. During the PM peak hour, 8,730 trips are projected to be generated by the project. The proposed Subarea Plan 1 assumes full interchanges at SR-56/Camino Santa Fe (on-site) and SR-56/Camino Ruiz (off-site).

Future street segment ADT volumes are shown on Figure 4B-2 and the projected levels of service are included in Table 4B-9. As shown, the following street and freeway segments are projected to operate at a LOS E or F.

- Black Mountain Road from Park Village Road to Mercy Road
- El Apajo from Via de Santa Fe to San Dieguito Road
- Rancho Bernardo Road from Bernardo Center Drive to West Bernardo Drive
- Rancho Peñasquitos Boulevard from I-15 to Via del SudSR-56
- San Dieguito Road from Camino Ruiz to El Apajo
- San Dieguito Road from Rancho Diegueno Road to El Camino Real
- Scripps Poway Parkway east of I-15
- Via de Santa Fe from Via de la Valle to El Apajo
- Camino Ruiz north of SR-56
- Via de la Valle from El Camino Real east to Via Santa Fe
- I-5 from Via de la Valle to SR-56
- I-15 from Pomerado Road to Mercy Road

Also, based on existing flow rates the following interchange ramps exceed a 15-minute delay:

- I-5/Via de la Valle northbound and southbound ramps
- I-5/Del Mar Heights Road northbound and southbound ramps
- I-5/Carmel Valley Road northbound and southbound ramps



Source: Urban Systems Associates, Inc. 1998

FIGURE 4B-2
Future Street Segment ADT, Subarea Plan 1

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TABLE 4B-9
SUBAREA PLAN 1 FUTURE STREET SEGMENT
LEVELS OF SERVICE

Street/Segment	Classification	Volume	ADT	LOS
Bernardo Center Drive				
Rancho Bernardo Road to Bernardo Heights Pkwy.	4-lane Major	40,000	31,300	D
Bernardo Heights Pkwy. to I-15	4-lane Major	40,000	35,000	D
Interstate 15 to Wet Bernardo Drive	4-lane Major	40,000	31,800	D
West Bernardo Dr. to Camino del Norte	4-lane Major	40,000	34,900	D
Black Mountain Road				
North of Carmel Valley Road	4-lane Major	40,000	19,900	B
Carmel Valley Rd. to Carmel Mountain Road	4-lane Major	40,000	22,300	C
Carmel Mountain Road to Paseo Montalban	4-lane Major	40,000	16,500	B
Paseo Montalban to Twin Trails Dr.	4-lane Major	40,000	22,700	C
Twin Trails Dr. to SR-56	6-lane Major	50,000	19,600	A
SR-56 to Park Village Road	6-lane Prime	60,000	46,800	C
Park Village Road to Mercy Road	6-lane Prime	60,000	65,200	F
Camino del Norte				
I-15 to Bernardo Center Dr.	6-lane Prime	60,000	49,300	C
Bernardo Center Dr. to Camino San Bernardo	6-lane Prime	60,000	45,500	C
Camino San Bernardo to Black Mountain Rd.	6-lane Prime	60,000	27,400	B
Camino Ruiz				
North of San Dieguito Rd.	4-lane Major	40,000	15,800	B
San Dieguito Rd. to Carmel Valley Rd.	4-lane Major	40,000	24,000	C
Carmel Valley Rd. to SR-56	6-lane Major	50,000	57,400	E
SR-56 to Carmel Mountain Rd.	6-lane Major	50,000	22,200	B
Carmel Mountain Rd. to Park Village Rd.	6-lane Major	40,000	17,900	A
Camino San Bernardo				
Camino del Norte to Rancho Bernardo Rd.	4-lane Major	40,000	16,600	B
Camino Santa Fe				
Del Mar Heights Rd. to SR-56	6-lane Major	50,000	29,700	C
South of SR-56	4-lane Major	10,000	6,600	C
Carmel Creek Road				
SR-56 to Carmel Country Road	4-lane Major	40,000	23,000	C
Carmel Country Road				
Del Mar Heights Road to Carmel Creek Road	4-lane Major	40,000	29,900	C
Carmel Creek Road to SR-56	4-lane Major	40,000	14,100	B
South of SR-56	4-lane Major	40,000	14,600	A
Carmel Mountain Road				
I-15 to Penasquitos Drive	6-lane Prime	40,000	31,800	B
Penasquitos Dr. to Ranchó Penasquitos Blvd.	4-lane Major	40,000	17,900	B
Rancho Penasquitos Blvd. to Paseo Montalban	4-lane Major	40,000	27,200	C
Paseo Montalban to Paseo Valdear	4-lane Major	40,000	13,900	A
Paseo Valdear to Black Mountain Road	4-lane Major	40,000	11,200	A
Black Mountain Road to Camino Ruiz	4-lane Major	40,000	7,600	A
Camino Santa Fe to El Camino Real	4-lane Major	30,000	13,000	D
El Camino Real to I-5	6-lane Major	35,000	29,400	C

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TABLE 4B-9
SUBAREA PLAN 1 FUTURE STREET SEGMENT
LEVELS OF SERVICE
(continued)

Street/Segment	Classification	Volume	ADT	LOS
Carmel Valley Road				
Del Mar Heights Rd. to Rancho Santa Fe Rd.	4-lane Major	40,000	26,000	C
Rancho Santa Fe Road to Camino Ruiz	4-lane Major	40,000	19,600	B
Camino Ruiz to Black Mountain Rd.	4-lane Major	40,000	31,000	D
Black Mountain Rd. south to Black Mountain Rd. north	4-lane Major	40,000	34,200	D
Black Mountain Rd. north to Camino del Norte	4-lane Major	40,000	22,200	C
Del Mar Heights Road				
West of I-5	6-lane Prime	60,000	43,900	C
I-5 to High Bluff Drive	6-lane Prime	60,000	46,100	C
High Bluff Dr. to El Camino Real	6-lane Prime	60,000	36,500	C
El Camino Real to Carmel Country Road	6-lane Prime	60,000	26,200	B
Carmel Country Road to Lansdale East	6-lane Prime	60,000	21,200	A
Lansdale East to Carmel Valley Boundary	6-lane Prime	60,000	19,100	A
Carmel Valley Boundary to Camino Santa Fe	4-lane Major	40,000	19,600	B
El Apajo				
Via de Santa Fe to San Dieguito Road	2-lane Collector	16,200	15,400	E
El Camino Real				
Carmel Mountain Rd. to SR-56	6-lane Major	50,000	17,900	A
SR-56 to High Bluff Dr.	6-lane Major	50,000	21,000	B
High Bluff Dr. to Del Mar Heights Rd.	6-lane Major	50,000	17,300	A
Del Mar Heights Rd. to Quarter Mile Dr.	4-lane Major	40,000	19,300	B
Quarter Mile Dr. to Half Mile Dr.	4-lane Major	40,000	20,300	B
Half Mile Dr. to San Dieguito Rd.	4-lane Major	40,000	27,500	C
San Dieguito Rd. to Via de la Valle	4-lane Major	40,000	28,900	C
Mercy Road				
Black Mountain Rd. to I-15	4-lane Major	40,000	30,000	C
Park Village Rd.				
Black Mountain Rd. to Camino Ruiz	4-lane Major	40,000	30,800	D
Poway Road				
East of I-15	6-lane Prime	60,000	46,600	C
Rancho Bernardo Rd.				
Bernardo Center Dr. to I-15	4-lane Major	50,000	46,300	E
I-15 to West Bernardo Dr.	4-lane Major	50,000	47,400	E
West Bernardo Dr. to Via del Campo	4-lane Major	40,000	28,700	C
Via del Campo to Camino San Bernardo	4-lane Major	40,000	30,100	D
Camino San Bernardo to Alva Rd.	4-lane Major	40,000	16,600	B
Rancho Diegueno Road				
Rancho Santa Fe Farms to San Dieguito Road	2-light Collector	16200	4,200	C
Rancho Penasquitos Blvd.				
I-15 to Via del Sud	4-lane Major	40,000	38,000	E
Via del Sud to SR-56	4-lane Major	45,000	35,500	C

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TABLE 4B-9
SUBAREA PLAN 1 FUTURE STREET SEGMENT
LEVELS OF SERVICE
(continued)

Street/Segment	Classification	Volume	ADT	LOS
Rancho Santa Fe Farms				
Rancho Diegueno Rd. to Monte Fuego Road	2-light Collector	16,200	3,900	B
Monte Fuego Road to Carmel Valley Road	2-lane Collector	10,000	5,900	C
San Dieguito Rd.				
Camino Ruiz to El Apajo	2-lane Collector	16,200	19,700	F
El Apajo to Rancho Diegueno Rd.	4-lane Collector	34,200	12,500	C
Rancho Diegueno Rd. to El Camino Real	2-lane Collector	16,200	14,900	F
Scripps Poway Parkway				
East of I-15	6-lane Prime	60,000	59,300	E
Via de Santa Fe				
Via de la Valle to El Apajo	2-lane Collector	16,200	12,900	F
Via de la Valle				
I-5 to San Andres Dr.	4-lane Major	40,000	29,400	C
San Andres Dr. to El Camino Real	4-lane Major	40,000	29,100	C
El Camino Real to Via Santa Fe	2-lane Collector	16,200	21,900	F

SOURCE: SANDAG Series 8 Black Mountain Ranch and Subarea III Traffic Forecast, Alternative 2, Interchange Model.

- I-15/Rancho Bernardo Road northbound and southbound ramps
- I-15/Bernardo Center Road northbound and southbound ramps
- I-15 southbound/Camino del Norte northbound and southbound ramps
- I-15 southbound/SR-56 northbound and southbound ramps

Because Subarea Plan 1's traffic contribution to three of the roadway segments identified above exceeds 2 percent, Subarea Plan 1 is considered to have a direct traffic impact. The three road segments follow:

- Black Mountain Road from Park Village Road to Mercy Road
- El Apajo from Via de Santa Fe to San Dieguito Road
- San Dieguito Road from Rancho Diegueno Road to El Camino Real

Table 4B-10 shows the AM and PM peak hour intersection LOS for 74 intersections in the area. As shown, all intersections are projected to operate at a LOS D or better.

The lower levels of service in the Rancho Bernardo Area are due to high-intensity levels of development in adjacent city and county areas. Regional improvements will be required to mitigate the intersections of I-5 southbound ramps and SR-56 and I-15 northbound ramps and Ted Williams Parkway. For the remaining intersections at LOS E or F, project traffic from Subarea III is minimal. Therefore, the poor level of service is due to non-Subarea III developments.

The City of San Diego has prepared an environmental impact report for various alignments for the proposed central segment of SR-56. The above-mentioned street improvements were evaluated as part of the SR-56 study. Regional improvements should be provided as determined by the SR-56 EIR and public review process.

A freeway segment analysis of Subarea Plan 1 shows that I-5 and I-15 are projected to operate at a LOS F. All freeway segments for SR-56 are projected to operate at a LOS D or better.

A possible three-interchange configuration was also tested. The third interchange was assumed to be located approximately south of Carmel Valley Road and west of the Subarea III and Subarea 4 boundary about half way between the Camino Santa Fe and Camino Ruiz interchange. This analysis shows that the same street segments and intersections projected to operate at a LOS E or F when two interchanges are assumed are the same when a possible third interchange is included. Finally, both I-5 and I-15 are projected to operate at a LOS F in the three-interchange configuration and all freeway segments for SR-56 are projected to operate at a LOS D or better. Both interchange configurations result in levels of service "D" or better. However, for the two-interchange

TABLE 4B-10
SUBAREA PLAN 1 FUTURE PEAK HOUR INTERSECTION LEVELS OF SERVICE

Key Number ¹	Intersection	A.M. Peak Hour		P.M. Peak Hour	
		Delay ²	LOS ²	Delay ²	LOS ²
1	I-15 NB ramps/Rancho Bernardo Road	6.0	B	16.5	C
2	I-15 SB ramps/Rancho Bernardo Road	19.0	C	16.9	C
3	Bernardo Center Dr./I-15 NB ramps	28.2	D	36.1	D
4	Bernardo Center Dr./I-15 SB ramps	16.5	C	38.9	D
5	I-15 NB ramps/Camino del Norte	22.6	C	24.0	C
6	I-15 SB ramps/Camino del Norte	26.3	D	21.9	C
7	Bernardo Center Drive/Camino del Norte	12.2	B	18.0	C
8	Bernardo Center Drive/West Bernardo Drive	19.0	C	18.9	C
9	Rancho Bernardo Road/West Bernardo Drive	15.2	C	24.9	C
10	Camino San Bernardo/Rancho Bernardo Road	9.5	B	9.8	B
12	Camino del Norte/Rancho Bernardo Road	11.6	B	11.0	B
13	Carmel Valley Road/Rancho Bernardo Road	10.5	B	10.2	B
14	Black Mountain Road/Carmel Valley Road	13.0	B	14.0	B
16	Camino del Norte/Camino Ruiz	7.4	B	6.8	B
17	Camino Ruiz/Resort Road	9.0	B	11.5	B
18	Camino Ruiz/San Dieguito Road	6.6	B	7.3	B
19	Camino Ruiz/Street "A" (north)	11.6	B	11.0	B
20	Camino Ruiz/Street "A" (south)	11.6	B	11.0	B
21	El Apajo/San Dieguito Road	9.2	B	6.1	B
23	Camino Diegueno Road/San Dieguito Road	6.8	B	7.6	B
25	El Camino Real/Via de la Valle (west)	19.5	C	25.0	C
26	El Camino Real/San Dieguito Road	8.7	B	12.4	B
27	I-5 NB ramps/Via de la Valle	13.4	B	11.2	B
28	I-5 SB ramps/Via de la Valle	7.9	B	11.4	B
29	Del Mar Heights Road/I-5 NB ramps	12.0	C	31.6	D
30	Del Mar Heights Road/I-5 SB ramps	7.5	B	9.6	B
31	I-5 NB ramps/SR-56 (Carmel Valley Road)	6.3	B	10.2	B
32	I-5 SB ramps/SR-56 (Carmel Valley Road)	12.7	B	10.2	B
36	El Camino Real (south)/SR-56 (Carmel Valley Road)	12.6	B	18.2	C
37	El Camino Real (north)/SR-56 (Carmel Valley Road)	10.1	B	12.3	B
40	Carmel Country Road/Del Mar Heights Road	10.7	B	11.8	B
42	Del Mar Heights Road/Highbluff Drive	16.1	C	13.2	B
43	Del Mar Heights Road/El Camino Real	12.4	B	14.3	B

TABLE 4B-10
SUBAREA PLAN 1 FUTURE PEAK HOUR INTERSECTION LEVELS OF SERVICE
(continued)

Key Number ¹	Intersection	A.M. Peak Hour		P.M. Peak Hour	
		Delay ²	LOS ²	Delay ²	LOS ²
45	Camino Santa Fe Road/SR-56 EB ramps	16.5	C	14.2	B
46	Camino Santa Fe Road/SR-56 WB ramps	20.9	C	10.9	B
47	Carmel Valley Road/Del Mar Heights Road	23.0	C	23.9	C
49	Camino Ruiz/SR-56 EB ramps	6.1	B	9.8	B
50	Camino Ruiz/SR-56 WB ramps	31.4	D	11.5	B
51	Camino Ruiz/Carmel Valley Road	15.4	C	20.4	C
52	Black Mountain Road/Carmel Mountain Road	13.9	B	15.3	C
53	Black Mountain Road/SR-56 WB ramps	11.9	B	22.9	C
54	Black Mountain Road/SR-56 EB ramps	10.3	B	10.7	B
55	Black Mountain Road/Park Village Road	37.2	D	37.6	D
57	Rancho Penasquitos Bl./SR-56 WB ramps	14.6	B	12.6	B
58	Rancho Penasquitos Bl./SR-56 EB ramps/ Azuaga Street	18.9	C	21.3	C
62	I-15 SB ramps/SR-56 (Ted Williams Parkway)	3.5	A	3.4	A
63	I-15 NB ramps/Ted Williams Parkway	17.8	C	11.3	B
69	Carmel Valley Road/Rancho Santa Fe Farms Road	11.4	B	11.0	B
73	Rancho Bernardo Road/Bernardo Center Road	7.6	B	32.1	D
74	Carmel Valley Road/Third Interchange Road	12.4	B	21.8	C

¹See Figure 4B-3 for location of intersections.

²LOS is measured in terms of delay (average delay per vehicle in seconds) and evaluated in accordance with the 1995 Highway Capacity Manual.

³Not applicable. LOS is for critical minor approach per Highway Capacity Manual unsignalized intersection analysis. Criteria for signalized intersections is as follows:

<u>Delay (seconds)</u>	<u>Level of Service</u>
≤5.0	A
>5.0 and ≤ 15.0	B
>15.0 and ≤ 25.0	C
>25.0 and ≤ 40.0	D
>40.0 and ≤ 60.0	E
≥60.0	F

configuration, “loop ramps” are required at the Camino Ruiz/SR-56 interchange. The loop on-ramps are assumed in the northeast and southwest quadrant of the interchange.

Subarea Plan 2 (SR-56 Alignment “D”). The total ADT for Subarea Plan 2 is 80,689 trips. As shown on Table 4B-8, the project is estimated to generate 7,024 peak hour trips during the AM and 8,802 peak hour trips during the PM. The same street segments, intersections (AM and PM peak hours), and freeway segments for I-5, I-15, and SR-56 for Subarea Plan 2 are projected to operate at a LOS E or F as for Subarea Plan 1. This is true for either the two- or possible three-interchange configuration.

c) Subarea Three Signalized Access Analysis

As shown on Figures 3-1 and 3-2, both Subarea Plans include various signalized access locations along Del Mar Heights Road and Carmel Valley Road. All signalized access locations are projected to operate at a LOS D or better for both interchange configurations of either of the two proposed subarea plans. It should be noted that the intersection of Del Mar Heights Road and Carmel Valley Road is projected to operate at a LOS D in the PM peak for the two-interchange configuration and LOS C for the possible three-interchange configuration.

d) Community Impacts

Area traffic will be affected by development of the proposed project. Four area communities have been identified as being potentially affected by project traffic: (1) County (Fairbanks/Rancho Santa Fe); (2) Carmel Valley community; (3) Rancho Bernardo community; and (4) Peñasquitos community.

County Areas

Three road segments in the county would be affected by the project. These road segments are:

- Camino Ruiz south of San Dieguito
- El Apajo to Rancho Diegueno or San Dieguito east of El Camino Real
- Rancho Santa Fe Farms north of Carmel Valley Road

Most of the traffic represents trips that originate in county areas and have destinations within the project area such as persons living in the county who visit friends in the project area. Because the resulting LOS for all three segments will be LOS D or better, this is not considered a significant effect.

Carmel Valley

For the Carmel Valley community, project traffic on Del Mar Heights Road would vary from 5.5 percent (1,420 trips) east of I-5 to 13.8 percent (3,562 trips) east of Carmel Country Road. On El Camino Real, project trips would range from 2.6 percent (671 trips) south of SR-56 to only 0.2 (52 trips) percent north of High Bluff Drive. On Carmel Country Road, project traffic would range from 0.3 (77 trips) percent to 3.5 percent (904 trips). Because all segments are projected to operate at LOS D or better, traffic impacts from Subarea III are considered to be less than significant.

Rancho Bernardo

In Rancho Bernardo, traffic to and from the project would exceed five percent at three locations:

- Bernardo Center Drive west of I-15 (6.6 percent)
- Carmel Valley Road west of Camino del Norte (12.4 percent)
- Black Mountain Road from Camino del Norte to Carmel Valley Road (3.8 percent)

Because all segments are projected to operate at LOS D or better, traffic impacts from Pacific Highlands Ranch are considered to be less than significant.

Peñasquitos Community

Five locations in this community would be exceed five percent of total daily traffic flows. These locations are:

- Carmel Valley Road east of Camino Ruiz (14.3 percent, 4,430 trips)
- Carmel Valley road east of Black Mountain Road (10.8 percent, 3,680 trips)
- Camino Ruiz south of Carmel Valley Road (8.4 percent, 5.1 percent, 3,752, 1,133 trips)
- Black Mountain Road south of SR-56 (6.7 percent, 4.3 percent; 3,113, 2,807 trips)
- Black Mountain Road to I-15 (3.5 percent , 1,048)

For all of the above street segments except for Black Mountain Road south of Park Village Drive, LOS D is projected. Therefore, a significant impact would occur on Black Mountain Road.

e) Alternative Modes of Travel

Trail Circulation

Both subarea plans envision a series of trails which will provide alternative modes of non motorized circulation throughout the project site. Trails will be both paved and unpaved. Pedestrians, equestrians, and bicyclists will use the trail system. In addition to the trail system, bicycle paths will be provided within road rights-of-way to encourage non-motorized movement throughout the area.

Paved Trails and Paths

Paved paths and sidewalks will be provided in the rights-of-way of all major, connector, and local roads. These paths will be a minimum of five feet wide and will be separated from the road by a parkway or landscape buffer. Also, bicycle lanes will be provided, where feasible, in the right-of-way as an alternative to the automobile.

Improved Multi-Purpose Trails and Paths

Unpaved trails and paths will consist of compacted decomposed granite or similar material and will be intended for pedestrians, bicycles, and other similar activities, and will comply with the requirements of the American with Disabilities Act. (ADA).

Unpaved Trails and Paths

These trails and paths will be for hiking, biking, and horseback riding within the open space and will consist of loose decomposed granite or another similar substance. The trails will generally follow the contours of the natural terrain and will avoid all grading within the MSCP area, except when required to connect neighborhoods and the Town Center area. Interpretive signs will be provided where appropriate. As prescribed in the MSCP Plan, trails and paths within the MSCP area will utilize existing utility easements and improvements where feasible.

Transit Center

In keeping with the concepts and ideas prescribed in the Framework Plan, integration of multiple transportation facilities to and through the Town Center area is important to the ultimate success of the community. The facility will permit both residents and visitors of the community to egress and ingress the area using a variety of transportation modes. The location encourages buses and other mass transportation vehicles to quickly and efficiently navigate the Town Center and Village area and the community. The transit center is located close to both residential and commercial land uses; therefore, it presents opportunities for alternative transportation within the community. The transit center will be designed in conformance with the guidelines established by the Metropolitan Transit Development Board (MTDB).

Utilizing the "F" alignment of SR-56 will permit the Town Center and Village area to be located on the north side of SR-56 and the transit center will be located in the Village. The "D" alignment of SR-56 will cause the Town Center and Village area to be located south of SR-56 and the transit center will be located in the Village. The "F" alignment provides for smoother and more efficient egress and ingress of transit vehicles.

f) Phasing Plan

The proposed Phasing Plan assumes that SR-56 is built and open to traffic by the end of the year 2000 as currently planned. Detailed graphics showing each phase are included in the transportation analysis, which is included under separate cover as Appendix B of this EIR.

Table 4B-11 shows the transportation phasing plan. As shown, there are seven phases (A-G). The first two phases (A-B) are for the Fairbanks Highlands and Subarea 4 projects. These two phases are provided for background information only. The number of dwelling units assumed for Fairbanks Highlands is based on a density of 1 unit per 4 acres. The current Subarea 4 development agreement does not have a pre-SR-56 development phase.

Phase C represents the Black Mountain Ranch project (Subarea 1) and is also presented only for information purposes. As shown, Black Mountain Ranch is currently entitled to 1,119 dwelling units based on their development agreement.

Phase D represents the initial start up phase for Subarea III. Subarea III would be allowed to develop 650 equivalent units. As with Phases A-C, the number of dwelling units for the first phase is based on a density of 1 unit per 4 acres. Extending Del Mar Heights Road as half of a four-lane major within a six-lane major right-of-way will provide access for the first phase of Subarea III. In addition, the Del Mar Heights Road disconnect is assumed until the SR-56 through-connection is complete. Also, completion of the Project Study Report (PSR) for the I-5/SR-56 north direct connectors is required.

For Phase E, both the completion of SR-56 as a four-lane freeway and the I-5/SR-56 dual freeway improvements are required. As shown on Table 4B-11, 1,250 dwelling units are permitted with Phase E improvements. Also, various off-site improvements are required. In addition, the Subarea III on-site infrastructure will be provided as required. Finally, funding of the project reports, Caltrans approval, and FHWA approval of the I-5/SR-56 direct connectors is required for Phase E.

State Transportation Implementation Plan (STIP) funding, design, and award of a construction contract for the I-5/SR-56 north direct connectors are required for Phase F. In addition, various off-site improvements by others are required as shown on Table 4B-11. Phase F provides for 1,500 dwelling units. Finally, for buildout of Subarea

TABLE 4B-11
SUBAREA III TRANSPORTATION PHASING PLAN - ALTERNATIVE A

Phase	Proposed Access Improvement	Approved Project or Subarea III Development	Transportation Threshold Condition Regarding Status of Route 56 North Ramps*	Comment or Description of Other Regional Improvements*
A Fairbanks Highlands	Improve old Black Mountain Road to Evergreen Nursery.	92 du		Background information approved project – 1 unit/4 acres density
B Subarea 4	Connect to existing Black Mountain Road or Carmel Mountain Road in Peñasquitos.	0† du		Background information approved project
C Black Mountain Ranch	<p>Development Agreement currently provides for up to 600 du to be developed with 3 access improvements:</p> <ol style="list-style-type: none"> 1. A 2-lane collector along existing Black Mountain Road/Carmel Valley Road alignment. 2. A 2-lane connection to Black Mountain Road in Peñasquitos. 3. A 2-lane connection to San Dieguito Road. Beyond 519 units a 2-lane Camino Ruiz-SR-56 connection must be provided if SR-56 is constructed to Camino Ruiz. 	1,119 du		Background information approved project with development agreement. 1 unit/4 acres density

TABLE 4B-11
SUBAREA III TRANSPORTATION PHASING PLAN - ALTERNATIVE A
(continued)

Phase	Proposed Access Improvement	Approved Project or Subarea III Development	Transportation Threshold Condition Regarding Status of Route 56 North Ramps*	Comment or Description of Other Regional Improvements*
D Start-up Phase for Subarea III/Del Mar Heights Road	Del Mar Heights Road—extend as 2 lanes of a 4-lane major to development areas. Provide one-half of ultimate street improvement.	650 equivalent du	Successful vote November 1998/ Subarea Plan/Development Agreement approval by City Council. Completion of a PSR for the I-5/SR-56 north direct connectors. One unit/4 acres density.	SR-56 ROW in Subarea III excluding ROW for the third interchange.
E Dual freeway completion/ SR-56 Freeway	SR-56 connected through as a 4-lane freeway between I-5 and I-15. Subarea III community infrastructure as required, including widening of Camino Santa Fe, Del Mar Heights Road, and Carmel Valley Road.	1,250 du + Private High School + Neighborhood Commercial (50,000 sf)	Funding for project reports, Caltrans approval, and FHWA approval of the I-5/SR-56 north direct connectors.	SR-56 at I-15, east to north loop ramp, east to south right-turn lane, add southbound on-ramp lane. Del Mar Heights Road at I-5 west to northbound I-5 right-turn lane. Black Mountain Road at Park Village Drive Intersection improvements. (Dual NB to WB left-turn lane).
F 5/56 North Connectors	Construct the I-5/SR-56 north direct connectors. Subarea III community infrastructure as required, including widening of Camino Santa Fe to 6 lanes.	1,500 du + Private High School + Neighborhood Commercial (100,000 sf)	STIP funding, design, and award contract for construction of the I-5/SR-56 north direct connectors.	Via de la Valle, between St Andres and El Camino Real east, improve to four lanes. El Camino Real between One-half Mile Drive and Via de la Valle, improve to 4-lane major street. Carmel Valley Road, between Del Mar

TABLE 4B-11
SUBAREA III TRANSPORTATION PHASING PLAN - ALTERNATIVE A
(continued)

Phase	Proposed Access Improvement	Approved Project or Subarea III Development	Transportation Threshold Condition Regarding Status of Route 56 North Ramps*	Comment or Description of Other Regional Improvements*
				Height Road and Black Mountain Road, improve to 4 lanes. Widen Camino Ruiz from Carmel Valley Road to Carmel Mountain Road to 4 lanes (Camino Ruiz/SR-56 diamond interchange).
G Buildout of Subarea III	Completion of community infrastructure.	1,600 du + Private High School + Neighborhood Commercial (150,000 sf) + Commercial Office‡	I-5/SR-56 north direct connectors open to traffic.	I-15, from SR-56 to Escondido, HOV lane extension. I-5, from Del Mar Heights to Birmingham, add HOV lanes. Camino Ruiz from Carmel Valley Road to Carmel Mountain road, widen to 6 lanes. Camino Ruiz at SR-56, provide loops or Third Interchange at SR-56, provide third interchange. Black Mountain Road, from SR-56 to Mercy Road, widen to six lanes. SR-56 widened to 6 lanes.
SUBAREA III TOTAL		5,000 du		

du = dwelling unit; sf = square feet; HOV = high-occupancy vehicle

*To be assured to the satisfaction of the City Engineer before development is authorized for each phase.

†No pre-SR-56 development. Development Agreement requires the assurance of SR-56.

‡May be provided in earlier phases based on equivalent dwelling units.

III, the I-5/SR-56 north direct connectors are required to be open to traffic. The required community infrastructure will also be completed. Table 4B-11 also identifies various off-site improvements, which will be developed by others during the buildout of Subarea III. Based on street segment volumes, Table 4B-12 shows the projected levels of service in the Future Urbanizing area. It also shows Subarea III's contribution to the various street segments. As can be seen, all street segments shown are projected to operate at acceptable levels of service except for San Dieguito Road from Camino Ruiz to El Apajo, which is projected to operate at LOS E. Project traffic is only 12 ADT, which is 0.1 percent of the total. Black Mountain Road is projected to operate at LOS E/F and is a significant impact.

g) Alternative Phasing Plan

An alternative phasing plan would be implemented only if SR-56 implementation is delayed for any reason (legal challenges, environmental, right-of-way, design, construction, or funding problems). Table 4B-13 shows the alternative transportation phasing plan. As shown, there are phases A-K. Similar to the proposed phasing plan, the first three phases (A, B, and C) are for the Fairbanks Highlands, Subarea 4, and Black Mountain Ranch projects. Again, these three phases are provided for background information only.

The alternative phasing plan proposes that Carmel Valley Road be extended as a two-lane collector in its permanent location along the SR-56 corridor to Camino Santa Fe Road and Camino Santa Fe Road be connected with Black Mountain Road. In addition, Del Mar Heights Road would be "disconnected" until a through connection of SR-56 between I-5 and I-15 is opened.

Phase D also represents the initial start-up phase for Subarea III. During Phase D, Subarea III would be allowed to develop 650 units. As with the other subareas discussed in items A-C above, the number of dwelling units for the first phase is based on a density of 1 unit per 4 acres, which is allowed by present zoning. Access for the first phase of Subarea III will be provided by extending Del Mar Heights Road as half of a four-lane major within a six-lane major street right-of-way. As summarized on Table 4B-12, for Phase D, completion of the PSR for the I-5/SR-56 north direct connectors is required.

Phases E through H are proposed only if SR-56 is not built according to the present schedule. For Phase E, Carmel Valley Road (SR-56) would be widened to four lanes along the SR-56 corridor to Camino Santa Fe including the construction of the westbound off-ramps (two lanes). Also, Camino Santa Fe would be widened to four lanes. Finally, funding for the project reports I-5/SR-56 north direct connectors is required for Phase E. Phase E would allow 350 dwelling units and Phase F would allow 300 dwelling units and require completion and Caltrans District Director approval of the project reports for the I-5/SR-56 north direct connectors.

TABLE 4B-12
FUA PHASING (YEAR 2005) STREET SEGMENT LEVELS OF SERVICE

Street/Segment	Class	LOS E ¹	ADT	LOS	Project ADT ²	% ADT	Significant
WITH SR-56							
Black Mountain Road							
Carmel Valley Rd. to Carmel Mtn. Rd.	4LM	40,000	22,200	C	295	0.7	No
Carmel Mtn. Rd. to Twin Trails Dr.	4LM	40,000	21,300	C	8	0.0	No
Twin Trails Dr. to SR-56	4LM	40,000	17,000	A	8	0.0	No
SR-56 to Park Village Dr.	4LM	40,000	36,100	E	1,088	2.7	Yes
Park Village Rd. to Mercy Rd.	4LM	40,000	46,600	F	1,047	2.6	Yes
Camino Ruiz							
San Dieguito Rd. to Carmel Valley Rd.	4LM	40,000	20,100	B	427	1.1	No
Carmel Valley Rd. to SR-56	4LM	40,000	33,500	D	1,561	3.9	Yes
Camino Santa Fe							
Del Mar Height Rd. to SR-56	4LM	40,000	21,600	C	15,057	37.6	Yes
Carmel Valley Rd.							
Del Mar Heights Rd. to Rancho Santa Fe Rd.	4LM	40,000	21,400	C	13,957	34.9	Yes
Rancho Santa Fe Rd. to Camino Ruiz	4LM	40,000	6,600	A	7,348	18.4	Yes
Del Mar Heights Rd.							
I-5 to El Camino Real	6LP	60,000	39,300	C	2,467	4.1	Yes
El Camino Real to Carmel Valley boundary	6LP	60,000	21,600	A	2,574	4.3	Yes
Carmel Valley boundary to Camino Santa Fe	4LM	40,000	17,300	B	4,027	10.1	Yes
Rancho Santa Fe Farms							
Rancho Diegueno Rd. to Carmel Valley Rd.	2LC	10,000	2,400	A	481	4.8	Yes
San Dieguito Rd.							
Camino Ruiz to El Apajo	2LC	16,200	12,100	E	12	0.1	No
El Apajo to Rancho Diegueno Rd.	4LC	34,200	5,700	C	293	0.9	No
Rancho Diegueno Rd. to El Camino Real	2LC	10,000	6,200	C	400	4.0	Yes ³
WITHOUT SR-56							
Black Mountain Road							
Carmel Valley Rd. to Carmel Mtn. Rd.	4LM	40,000	23,600	C	295	0.7	No
Carmel Mtn. Rd. to Twin Trails Dr.	4LM	40,000	19,000	B	8	0.0	No
Twin Trails Dr. to SR-56	4LM	40,000	15,600	B	8	0.0	No
SR-56 to Park Village Dr.	4LM	40,000	30,800	E	1,088	2.7	Yes
Park Village Rd. to Mercy Rd.	4LM	40,000	44,700	F	1,047	2.6	Yes
Camino Ruiz							
San Dieguito Rd. to Carmel Valley Rd.	4LM	40,000	23,000	C	427	1.1	No
Carmel Valley Rd. to SR-56	4LM	40,000	46,500	C	1,561	3.9	Yes
Camino Santa Fe							
Del Mar Height Rd. to SR-56	4LM	40,000	38,000	D	15,057	37.6	Yes
Carmel Valley Rd.							
Del Mar Heights Rd. to Rancho Santa Fe Rd.	4LM	40,000	38,000	D ²	13,957	34.9	Yes
Rancho Santa Fe Rd. to Camino Ruiz	4LM	40,000	33,900	D	7,348	18.4	Yes
Del Mar Heights Rd.							
I-5 to El Camino Real	6LP	60,000	39,200	C	2,467	4.1	No
El Camino Real to Carmel Valley boundary	6LP	60,000	17,200	A	2,574	4.3	No
Rancho Santa Fe Farms							
Rancho Diegueno Rd. to Carmel Valley Rd.	2LC	10,000	4,700	A	481	4.8	Yes
San Dieguito Rd.							
Camino Ruiz to El Apajo	2LC	16,200	14,600	E	12	0.1	No
El Apajo to Rancho Diegueno Rd.	4LC	34,200	7,500	A	293	0.9	No
Rancho Diegueno Rd. to El Camino Real	2LC	10,000	9,900	E	400	4.0	Yes

¹Capacity at LOS E from City of San Diego standards

²Interim condition, can be mitigated to LOS D with intersection widening or segment widening

³In initial phase (phase D), 41 dwelling units have access to San Dieguito Road which is currently operating at LOS F

Class

2LC = 2-lane collector; 4LC = 4-lane collector; 4LM = 4-lane major; 6LM = 6-lane major; 6LP = 6-lane prime

TABLE 4B-13
SUBAREA III ALTERNATIVE TRANSPORTATION PHASING PLAN

Phase	Proposed Access Improvement	Approved Project or Subarea III Development	Transportation Threshold Condition Regarding Status of Route 56 North Ramps*	Comment or Description of Other Regional Improvements*
A Fairbanks Highlands	Improve old Black Mountain Road to Evergreen Nursery.	92 du		Background information Approved project – 1 unit/4 acres density
B Subarea 4	Connect to existing Black Mountain Road or Carmel Mountain Road in Peñasquitos.	0† du		Background information only – threshold being discussed with City staff. Approved project.
C Black Mountain Ranch	Extend Carmel Valley Road as a 2-lane collector along the SR-56 corridor to Camino Santa Fe Road and build Camino Santa Fe Road to connect with Black Mountain Road. Disconnect Del Mar Heights Road until a through connection of SR-56 between I-5 and I-15 is opened. Subject to SR-56 location selection. Beyond 600 units a 2-lane Camino Ruiz-SR-56 connection must be provided if SR-56 is constructed to Camino Ruiz.	1,119 du		Background Information Approved project with development agreement. 1 unit/4-acre density. Development Agreement currently provides for up to 600 du to be developed with 3 access improvements: A. 2-lane collector along existing Black Mountain Road/Carmel Valley Road Alignment. B. A 2-lane connection to Black Mountain Road in Peñasquitos. C. A 2-lane connection to San Dieguito Road. Beyond 519 units a 2-lane Camino Ruiz-SR-56 connection must be provided if SR-56 is constructed to Camino Ruiz.

TABLE 4B-13
SUBAREA III TRANSPORTATION PHASING PLAN - ALTERNATIVE B
(continued)

Phase	Proposed Access Improvement	Approved Project or Subarea III Development	Transportation Threshold Condition Regarding Status of Route 56 North Ramps*	Comment or Description of Other Regional Improvements*
D Start-up Phase for Subarea III/Del Mar Heights Road	Del Mar Heights Road - extend as 2 lanes of a 4-lane major to development areas. Provide half of ultimate street improvement.	650 du	Successful vote November 1998/ Subarea Plan/Development Agree- ment approval by City Council. Completion of a Project Study Report (PSR) for the I-5/SR-56 north direct connectors. One unit/4 acres density.	SR-56 ROW in Subarea III provided to the satisfaction of the City Engineer, excluding ROW for the third interchange
E Subarea III - pre SR-56 if necessary/Carmel Valley Road & SR-56	Widen Carmel Valley Road (SR- 56) to 4 lanes along the SR-56 corridor to Camino Santa Fe including the construction of the westbound off-ramp (2 lanes) and extend and widen Camino Santa Fe Road to 4 lanes.	350 du	Funding for PR/ED in year 2000 STIP for the I-5/SR-56 north direct connectors.	Alternative phasing threshold only if SR-56 is not on the current schedule, i.e., open to traffic by December 2000. Construct Camino Ruiz as a 2-lane road from Carmel Valley Road to SR-56. Extend SR-56 as a 2-lane road from Black Mountain Road to Camino Ruiz.
F Subarea III - pre-SR-56 if necessary/Carmel Valley Road & SR-56	Widen Carmel Valley Road (SR- 56) to 4 lanes along the SR-56 corridor to Camino Santa Fe including the construction of the westbound off-ramp (2 lanes) and extend and widen Camino Santa Fe Road to 4 lanes.	300 du	Completion and CALTRANS District Director approval of the PR/ED for the I-5/SR-56 north direct connectors.	Alternative phasing threshold only if SR-56 is not on the current schedule, i.e., open to traffic by December 2000.

TABLE 4B-13
SUBAREA III TRANSPORTATION PHASING PLAN - ALTERNATIVE B
(continued)

Phase	Proposed Access Improvement	Approved Project or Subarea III Development	Transportation Threshold Condition Regarding Status of Route 56 North Ramps*	Comment or Description of Other Regional Improvements*
G Subarea III – pre-SR-56 if necessary/Carmel Valley Road & SR-56	Widen Carmel Valley Road (SR-56) to 4 lanes along the SR-56 corridor to Camino Santa Fe including the construction of the westbound off-ramp (2 lanes) and extend and widen Camino Santa Fe Road to 4 lanes.	300 du + private high school + Neighborhood Commercial (50,000 sf)	Submittal of CALTRANS approved I-5/SR-56 north direct connector project reports to FHWA for approval.	Alternative phasing threshold only if SR-56 is not on the current schedule, i.e., open to traffic by December 2000. Widen Camino Ruiz to a 4-lane road from Carmel Valley Road to SR-56. Extend SR-56 as a 4-lane road from Black Mountain Road to Camino Ruiz. SR-56 at I-15, east to north loop ramp, east to south right-turn lane, add southbound on ramp lane. Del Mar Heights Road at I-5 west to northbound I-5 right-turn lane. Black Mountain Road at Park Village Drive intersection improvements. (Dual NB to WB left-turn lane).
H Subarea III – pre-SR-56 if necessary	Signalize and widen intersections to 6 lanes as required.	300 du + private high school + Neighborhood Commercial (50,000 sf)	FHWA approval of project reports for the I-5/SR-56 north direct connectors.	Alternative phasing threshold only if SR-56 is not on the current schedule, i.e., open to traffic by December 2000.
I Route 56 freeway	SR-56 connected through as a 4 lane freeway between I-5 and I-15.	300 du + private high school + Neighborhood Commercial (100,000 SF)	Funding in the STIP for the I-5/SR-56 north direct connectors. Complete design of the I-5/SR-56 north direct connectors.	

TABLE 4B-13
SUBAREA III TRANSPORTATION PHASING PLAN - ALTERNATIVE B
(continued)

Phase	Proposed Access Improvement	Approved Project or Subarea III Development	Transportation Threshold Condition Regarding Status of Route 56 North Ramps*	Comment or Description of Other Regional Improvements*
J Dual freeway completion	Construct the I-5/SR-56 north direct connectors. SR-56 connected through as a 4-lane freeway between I-5 and I-15.	1,200 du + private high school + Neighborhood Commercial (100,000 SF)	Award contract for construction of the I-5/SR-56 north direct connectors.	Via de la Valle, between St Andres and El Camino Real east, improve to four lanes. El Camino Real between Half-mile Drive and Via de la Valle, improve to 4-lane major street. Carmel Valley Road, between Del Mar Height Road and Black Mountain Road, improve to 4 lanes. Widen Camino Ruiz from Carmel Valley Road to Carmel Mountain Road to 4 lanes.
K Buildout of Subarea III	Completion of community infrastructure.	1,600 du + private high school + Neighborhood Commercial (150,000 sf) + Commercial Office‡	I-5/SR-56 north direct connectors open to traffic.	I-15, from SR-56 to Escondido, HOV lane extension. I-5, from Del Mar Heights to Birmingham, add HOV lanes. Camino Ruiz from Carmel Valley Road to Carmel Mountain Road, widen to 6 lanes. Camino Ruiz at SR-56, provide loops or third interchange at SR-56, provide third interchange. Black Mountain Road, from SR-56 to Mercy Road, widen to six lanes. SR-56 widened to 6 lanes.
SUBAREA III TOTAL		5,000 du		

du = dwelling unit; sf = square feet; HOV = high-occupancy vehicle

*To be assured to the satisfaction of the City Engineer before development is authorized for each phase.

†No pre-SR-56 development. Development Agreement requires the assurance of SR-56.

‡May be provided in earlier phases based on equivalent dwelling units.

For Phase G, submittal of the Caltrans approved I-5/SR-56 north direct connectors project reports to Federal Highways Administration (FHWA) is required. As summarized on Table 4B-13, 300 dwelling units are permitted for Phase G. In addition, various off-site improvements by others are identified in Table 4B-12. Finally, Phase H requires FHWA approval of the project reports for the I-5/SR-56 north direct connectors and allows development of up to 300 dwelling units.

For Phase I both the completion of SR-56 as a four-lane freeway and the I-5/SR-56 dual freeway improvements are required and 300 dwelling units are allowed. In addition, funding in the STIP for the I-5/SR-56 north direct connectors is required for Phase I. Also, various off-site improvements are required as shown on Table 4B-13. The Subarea III on-site infrastructure will also be provided as required. Finally, complete design of the I-5/SR-56 north direct connectors is required for Phase I.

Award of a construction contract for the I-5/SR-56 north direct connectors are required for Phase J and 1,200 dwelling units are allowed. In addition, various off-site improvements are required as shown on Table 4B-13. Finally, for buildout of Subarea III, the I-5/SR-56 north direct connectors are required to be open to traffic. The required community infrastructure will also be completed. Table 4B-13 also identifies various off-site improvements which will be built by others during the buildout of Subarea III.

h) Carmel Valley Neighborhood 10 Precise Plan

As explained in the Project Description of this MEIR, part of the proposed MHPA boundary adjustment includes an increase of 174 dwelling units in Carmel Valley Neighborhood 10. In order to accommodate the increase in traffic associated with the increase in total dwelling units for Neighborhood 10, the combined phasing plan for Neighborhood 10 and 8A would be revised. The revised phasing plan is included in an attachment to the traffic analysis of Subarea III (see Appendix B, Attachment 3 of this MEIR).

The three changes proposed for the adopted combined Neighborhood 10 and 8A Phasing Plan are:

1. Add 15 multi-family dwelling units to reflect the final approved neighborhood plan.
2. Add 174 multi-family dwelling units to reflect the units transferred from 8A.
3. Revise the trip generation rate from 8 to 6 trips/unit due to increased density represented by the increase in units.

As shown in Attachment 3 and 4 of Appendix B, the increase in the total number of Neighborhood 10 units ($15 + 174 = 189$) is offset by a reduction in units permitted in

Neighborhood 8A, if development were permitted. Thus, there is no net change in roadway impacts due to the fact that Carmel Country Road was previously analyzed at its full capacity and the units transferred to Neighborhood 10 are fully offset by the reduction of units transferred from Neighborhood 8A. Therefore, the conclusions of the previous Neighborhood 10 traffic analysis remain unchanged and no further analysis is necessary.

Significance of Impacts

As discussed above, the following impacts are considered both direct and cumulatively significant:

- Development of 41 Phase I units east of the existing Del Mar Heights Estates.
- Project contribution of more than 2 percent traffic to Black Mountain Road/Park Village intersection.
- Additional traffic contribution to Black Mountain Road from SR-56 to Mercy Road (currently failing).
- Project contribution of more than 2 percent traffic to El Camino Real between Via de la Valle and Half Mile Drive (LOS F).
- Project contribution of 7.5 percent traffic to Camino Ruiz North or SR-56 at buildout without the third intersection (LOS E).
- Project contributions to freeway areas where wait already exceeds 15 minutes.
- Project contribution of more than 2 percent traffic to El Apajo from Via Santa Fe to San Dieguito Road.

The following project traffic impacts are considered adverse but because they do not exceed 2 percent of the total traffic they are less than significant:

- Via de la Valle between El Camino Real and San Andres.
- Rancho Bernardo Road
- San Dieguito Road between Camino Ruiz and El Apajo.

Mitigation

Table 4B-14 includes all of the area's transportation improvements necessary to reduce project impacts to the extent feasible; however, not all impacts are reduced to below a significant level. Table 4B-14 includes the location of the improvement, the type of the improvement, the party responsible for the improvement, and the level of significance after mitigation.

**TABLE 4B-14
TRANSPORTATION IMPROVEMENT SUMMARY**

Location	Improvement	Responsibility	Significance Level After Mitigation
ON-SITE			
Del Mar Heights Road	Construct as a 4-lane major in a 6-lane ROW from Community Plan boundary to Camino Santa Fe	Subarea III + others	Less than significant
SR-56/Camino Santa Fe	Construct interchange	Subarea III + others	Less than significant
Camino Santa Fe	Construct as a 6-lane major from SR-56 to Del Mar Heights Road.	Subarea III	Less than significant
Carmel Valley Road	Construct as a 4-lane major in a 6-lane ROW from Camino Santa Fe to subarea boundary.	Subarea III	Less than significant
San Dieguito Road	Construct a traffic signal at Del Mar Highlands Estates entrance.	Subarea III	Significant direct & cumulative
SR-56	Provide ROW in Subarea III for SR-56 to the satisfaction of the City Engineer	Subarea III	Less than significant
Various on-site collector streets	Construct as required by City Engineer	Subarea III	Less than significant
Various signal locations	Provide signals as determined by City Engineer	Subarea III	Less than significant
OFF-SITE			
State Route 56*	Widen to 6-lane freeway between I-5 and I-15	Fair-share contribution	Less than significant
State Route 56	Construct 4-lane freeway between I-5 and I-15.	Others	Less than significant
Interstate 5/State Route 56†	Construct northbound direct connectors	Fair-share contribution	Less than significant
Carmel Valley Road	Construct as a 4-lane major from Subarea III boundary to Camino Ruiz	Others	Less than significant
Camino Ruiz	Construct as 6-lane major from Carmel Valley Road to Carmel Mountain Road.	Others	Significant cumulative
Camino Ruiz/SR-56	Provide diamond interchange, upgrade includes "loops" or provide third interchange at SR-56	Others	Significant cumulative

**TABLE 4B-14
TRANSPORTATION IMPROVEMENT SUMMARY**

Location	Improvement	Responsibility	Significance Level After Mitigation
OFF-SITE (cont.)			
SR-56/I-15‡	Provide east to north loop ramp, east to south right-turn lane and southbound on ramp	Fair-share contribution	Less than significant
Black Mountain Road at Park Village	Provide intersection improvements; NB dual left-turn lanes, or SB right-turn lane.	Subarea III + others	Significant direct & cumulative
Del Mar Heights Road/I-5	Add west to northbound I-5 right-turn lane	Subarea III + others	Less than significant
Via de la Valle	Improve to 4 lanes between San Andres Drive and El Camino Real	Others	Less than significant
El Camino Real†	Improve to 4 lanes between Half Mile Drive and Via de la Valle	Fair-share contribution	Significant direct & cumulative
Black Mountain Road†	Improve to 6 lanes from SR-56 to Mercy Road	Fair-share contribution	Significant direct & cumulative
I-5	Provide HOV lanes from Del Mar Heights Road to Birmingham Dr.	Others	Significant cumulative (outside scope of project)
I-15	Provide HOV lane extension from SR-56 to Escondido	Others	Significant cumulative (outside scope of project)

ROW = right-of-way; HOV = high-occupancy vehicle

*The fair share for SR-56 widening to six lanes is based on the number of dwelling units in Subarea III relative to the total dwelling units in the NCFUA satisfactory to the City Engineer.

†The fair-share calculation should be based on the projects share of future growth of traffic, satisfactory to the City Engineer.

‡The fair share for SR-56/I-15 interchange should include project traffic volume from Carmel Valley Road east of Black Mountain Road or include Carmel Valley Road from Black Mountain Road to Camino del Norte in the final phase of development in Subarea III transportation phasing plan.

C. Biological Resources

Biological field surveys on the Pacific Highlands Ranch site were conducted in November and December of 1996 and April through January of 1998. The survey dates, times, weather conditions, and purpose of the survey conducted by Natural Resource Consultants (NRC) are included in Appendix C1. Information in this report incorporates the results of NRC's studies conducted in December 1996 through August of 1997 for Pardee and all other properties owned in this subarea. This report is supplemented by biological resources information collected by Sweetwater Environmental Biologists, Inc. (SEB) in 1993 and in December of 1996.

Existing Conditions

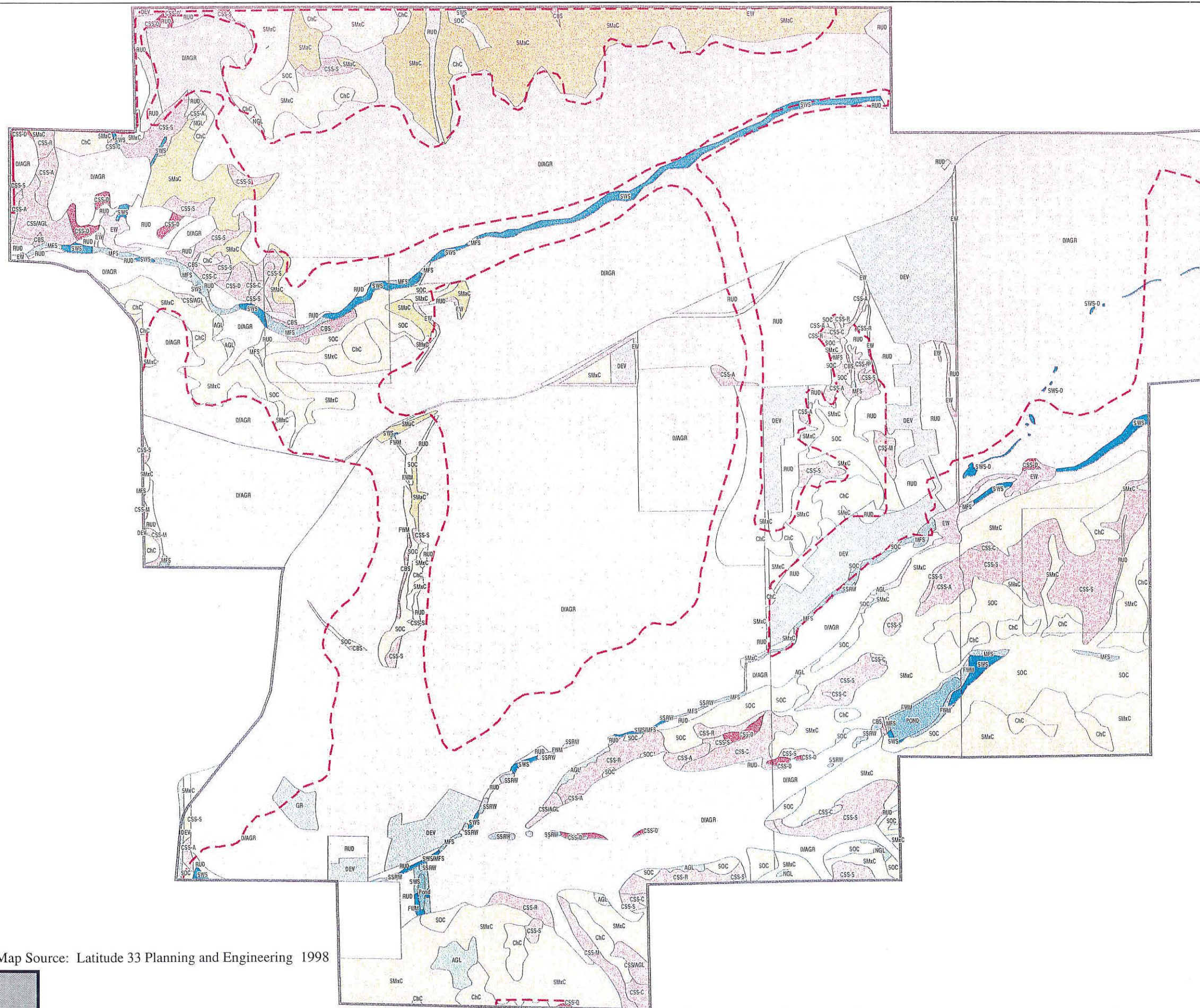
a) Vegetation

As shown on Figure 4C-1, a variety of native vegetation communities occur in Pacific Highlands Ranch. Approximately 1,320 acres or 50 percent of the 2,652-acre site are used for agricultural activities. The remaining portions of the site support patches of chaparral, coastal sage scrub, grassland, woodlands, riparian, and ruderal vegetation. Within the native habitats is a variety of vegetation communities, including coastal sage scrub, coyote bush scrub, disturbed coastal sage scrub, southern maritime chaparral, southern mixed chaparral, scrub oak chaparral, graded lands, and developed areas. The characteristics of each community are described below and summarized in Table 4C-1.

Chaparral

Chaparral is one of the two dominant native vegetation types in coastal southern California; the other is Diegan coastal sage scrub. Chaparral communities are dominated by evergreen shrubs that have small, thick, leathery leaves to resist water losses. Stands of chaparral generally constitute more or less dense, continuous cover of shrubs all of similar height, although this height varies from about 3 feet to over 12 feet, depending on the chaparral type, the soil quality, and the aspect.

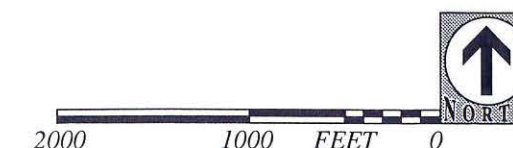
Chaparral communities go through frequent cycles of burning and regeneration. The floral diversity, especially of herbaceous species, is greatest during the first years of regeneration following a fire. Within Pacific Highlands Ranch, there is chaparral undergoing various stages of this process; these stages are relatively transitory, and have not been distinguished. Sometimes, following a fire, however, a flora strongly dominated by black sage (*Salvia mellifera*) may become established, and may persist for several years until the slower growing chaparral shrubs replace it. Vegetation in this stage has been mapped as it appears at present: as coastal sage scrub—black sage-dominated. Four



- Existing MHPA Boundary
- Chaparral**
- ChC Chamise Chaparral
 - SMxC Southern Mixed Chaparral
 - SOC Scrub Oak Chaparral
 - SMaC Southern Maritime Chaparral
- Coastal Sage Scrub**
- CSS-R Lemonade-berry
 - CSS-S Black Sage
 - CSS-A California Sagebrush
 - CSS-C California Adolphia
 - CSS-AGL Mixed-Annual Grassland
 - CSS-M Mixed
 - CSS-D Disturbed
- Other Scrub Vegetation**
- CBS Coyote Brush Scrub
- Riparian Scrub**
- SWS Southern Willow Scrub
 - MFS Mulefat Scrub
 - FWM Coastal & Valley Freshwater Marsh
- Woodland**
- SSRW Southern Sycamore Riparian Woodlands
 - EW Eucalyptus Woodlands
- Grasslands**
- AGL Annual Grassland
 - NGL Native Grassland
- Other Vegetation**
- RUD Ruderal
 - D/AGR Disked/Agricultural
 - GR Graded
 - DEV Developed

FIGURE 4C-1
Existing Vegetation

Map Source: Latitude 33 Planning and Engineering 1998



**TABLE 4C-1
VEGETATION COMMUNITIES PRESENT ON THE PROJECT SITE**

Vegetation Community	Map Symbol	Acres	Total
Chaparral			449.4
Chamise	ChC	46.0	
Southern maritime	SMaC	89.3	
Southern mixed	SMxC	227.0	
Scrub oak chaparral	SOC	87.1	
Coastal Sage Scrub			127.9
Lemonadeberry	CSS-R	17.2	
Black sage	CSS-S	63.0	
California sagebrush	CSS-A	13.1	
Mixed	CSS-M	12.3	
Disturbed	CSS-D	8.0	
Mixed-annual grassland	CSS-AGL	8.3	
California adolphia	CSS-C		
Other Scrub Vegetation			3.7
Coyote brush scrub	CBS	3.7	
Riparian Scrub			31.0
Southern willow scrub	SWS	17.6	
Mule fat scrub	MFS	10.4	
Coastal and valley freshwater marsh	FWM	3.0	
Woodland			21.82
Southern sycamore riparian	SSRW	2.8	
Eucalyptus woodlands	EW	14.8	
Pond		4.2	
Grasslands			2.1
Annual	AGL	0.6	
Native	NGL	1.5	
Other Vegetation			1,521.3
Ruderal	RUD	120.7	
Disked/agriculture	D/AGR	1320.3	
Graded	GR	3.6	
Developed	DEV	76.7	
TOTAL		2,157.2	2,157.2

different types of chaparral covering a total of 449.4 acres have been mapped, based on their different species composition.

Chamise (*Adenostoma fasciculatum*) is probably the most widely distributed chaparral shrub and is present in almost all types and occurrences of chaparral. This may be due in part to its dual ability to regenerate after a fire by both root-crown sprouting and by seed germination. Despite the ubiquity of chamise, chamise chaparral is defined as chaparral that comprises an almost monospecific stand of chamise. Few, isolated individuals of black sage, bushrue (*Cneoridium dumosum*), or mission manzanita (*Xylococcus bicolor*) may also be present.

In Pacific Highlands Ranch, chamise chaparral covers 46 acres and dominates flat mesa tops. This community also occurs in scattered patches on south-facing slopes. The latter occurrences are chiefly on poor-quality, pebbly soil, where the shrubs are lower and more widely spaced. This allows a sparse understory of low-growing herbaceous plants to become established. Important in this association are the sensitive species ashy spike-moss, along with small-flowered soap-plant (*Chlorogalum parviflorum*), goldfields (*Lasthenia californica*), fragrant everlasting (*Gnaphalium canescens* ssp. *beneolens*), and the spectacular yellow weed's mariposa lily (*Calochortus weedii* var. *weedii*).

Southern maritime chaparral is a mixed-dominance chaparral. Its important species include those characteristic of southern mixed chaparral, together with several species that are more restricted to the immediate coastal area. It occurs on weathered sandstone soils, and lies within the coastal fog belt. Dominant species in the southern maritime chaparral within Pacific Highlands Ranch are chamise, white coast ceanothus, or wart-stemmed lilac (*Ceanothus verrucosus*), mission manzanita, bushrue, Nuttall's scrub oak (*Quercus dumosa*), and summer holly (*Comarostaphylis diversifolia*). Del Mar manzanita (*Arctostaphylos glandulosa* ssp. *crassifolia*) is also present, and Mojave yucca (*Yucca schidigera*) is often common. Southern maritime chaparral often has a relatively open cover of shrubs. In the understory, a characteristic species is the sensitive species Del Mar sand-aster (*Lessingia filaginifolia* var. *linifolia*). Also common are coast barrel cactus (*Ferocactus viridescens*), California plantain (*Plantago erecta*), skunkweed (*Navarretia hamata*), Weed's mariposa lily, woolly-fruited lomatium (*Lomatium dasycarpum*), and bird's foot cliff-brake (*Pellaea mucronata*). Brewer's calandrinia (*Calandrinia breweri*), although uncommon, occurs in this community.

In Pacific Highlands Ranch, southern maritime chaparral covers 89.3 acres and is common across the north and west, where it occupies sloping valley sides of any aspect. The southern maritime chaparral along the north-facing slopes in the northeast of the area is overwhelmingly dominated by white coast ceanothus, with localized Del Mar manzanita and summer holly, but little or no chamise.

Southern mixed chaparral is another mixed-dominance chaparral subcommunity. It has a long list of characteristic shrubs, including chamise, mission manzanita, Nuttall's scrub oak, summer holly, lemonadeberry (*Rhus integrifolia*), laurel sumac (*Malosma laurina*), toyon (*Heteromeles arbutifolia*), Mojave yucca, redberry (*Rhamnus crocea*), white-flowered currant (*Ribes indecorum*), and fuchsia-flowered gooseberry (*Ribes speciosum*). Locally, San Diego mountain-mahogany (*Cercocarpus minutiflorus*) and Ramona lilac (*Ceanothus tomentosus* ssp. *olivaceus*) become important. Vines are an important component of southern mixed chaparral, especially on north-facing slopes. They include manroot (*Marah macrocarpus*), southern honeysuckle (*Lonicera subspicata* var. *denudata*), pipestem virgin's bower (*Clematis lasiantha*), and San Diego sweet pea (*Lathyrus vestitus* var. *alefeldii*).

Southern mixed chaparral often forms dense, impenetrable stands 6–20 feet tall, with little understory. However, around the edges, and within local openings, there is a diverse herbaceous assemblage beneath the shrubs, including hedge-nettle (*Stachys ajugoides* var. *rigida*), granny's hairnet (*Pterostegia drymarioides*), leafy daisy (*Erigeron foliosus*), chaparral star-lily (*Zigadenus fremontii*), woolly Indian paintbrush (*Castilleja foliolosa*), and unalaska rein orchid (*Piperia unalascensis*). On moister north-facing slopes there are California bee-plant (*Scrophularia californica*), sacapellote (*Acourtia microcephala*), sharp-tooth sanicle (*Sanicula arguta*), Pacific sanicle (*Sanicula crassicaulis*), and common chickweed (*Stellaria media*). Along the foot of north-facing slopes the sensitive species Palmer's sagewort or San Diego sagewort (*Artemisia palmeri*) is locally common.

In Pacific Highlands Ranch, southern mixed chaparral covers 227.0 acres and occupies many north-facing slopes. It also occurs on flatter areas, especially in the southern and eastern part of the area, further from the coast than the southern maritime chaparral.

Scrub oak chaparral is dominated by scrub oak. Within a few miles of the coast, as here in Pacific Highlands Ranch, the oak is Nuttall's scrub oak, which is itself a sensitive species. In addition to scrub oak, shrubs include occasional San Diego mountain-mahogany, toyon, and summer holly. Near creeks, the grass giant wild rye (*Leymus condensatus*), and the vine western virgin's bower (*Clematis ligusticifolia*) are often present. Scrub oak chaparral often has a very dense canopy, and the ground beneath it is covered thickly with leaf litter, so that there is little or no herbaceous understory. Where herbaceous plants are present, chiefly around the edges of north-facing scrub oak stands, they include common eucrypta (*Eucrypta chrysanthemifolia*), blue fiesta-flower (*Pholistoma auritum*), and miner's lettuce (*Claytonia perfoliata*).

In Pacific Highlands Ranch this community covers 87.1 acres. The principal occurrence of scrub oak chaparral is in the southeast, in Deer Canyon, where it occupies the entire canyon bottom, and spreads some way up the mesa sides to both north and south. It

occurs in smaller stands elsewhere throughout the subarea, mainly in valley bottoms and on the lower parts of north-facing slopes.

Diegan Coastal Sage Scrub

Coastal sage scrub is the second of the two dominant native vegetation types in this part of California. It occurs in the same general areas as chaparral, but tends to occupy drier, more xeric situations, such as south-facing slopes in contrast to chaparral-covered north-facing slopes. Sage scrub communities are dominated by lower-growing shrubs and subshrubs that lose their leaves to minimize water losses during summer drought. They may replace them with lesser amounts of smaller leaves. Many of the shrubs and subshrubs in coastal sage scrub are three to six feet tall, and have relatively open canopies. There is therefore often a significant herbaceous understory, including native grasses and colorful native annual wildflowers.

Four different types of Diegan coastal sage scrub covering 127.9 acres have been mapped, based on the dominant shrubby species in each case. In addition, mixed dominance and disturbed associations have been recognized.

Coastal Sage Scrub—Lemonadeberry-dominated. This type of coastal sage scrub forms a transition from chaparral communities, and is described first for that reason. It is completely dominated by lemonadeberry, with lesser amounts of toyon and often laurel sumac. These three species are tall, evergreen shrubs with leathery leaves, and fit the description of chaparral species. However, these three species are always found scattered in smaller numbers through coastal sage scrub of all types, and in lemonadeberry-dominated coastal sage scrub, other chaparral species are absent.

There is debate among botanists as to whether this community should be classified as a type of sage scrub, or a type of chaparral. The few openings between the taller shrubs are occupied by sage scrub species, mainly California sagebrush (*Artemisia californica*) and black sage, with patches of poison oak (*Toxicodendron diversilobum*), bush monkey-flower (*Mimulus aurantiacus*), and giant wild rye.

In Pacific Highlands Ranch, lemonadeberry-dominated coastal sage scrub covers 17.2 acres and is confined to north-facing slopes, mainly in the southern part of the area, along the north faces of Santa Monica Ridge and Shaw Ridge.

Coastal Sage Scrub—Black Sage-dominated. Black sage-dominated coastal sage scrub often consists of almost pure stands of black sage, although it can also include California sagebrush and California adolphia (*Adolphia californica*), and may grade into these sage scrub types. Herbaceous plants in openings between the shrubs include both native and introduced annual grasses, and a variety of annual wildflowers. On south- and southwest-facing slopes, this community contains significant populations of coast barrel cactus.

In Pacific Highlands Ranch, black sage-dominated coastal sage scrub covers 63.0 acres and occurs mainly on ridge tops and south-facing slopes, scattered across the entire area. In some places, this community is a temporary development, following a fire, which will be crowded out within a few years when the slower growing chaparral shrubs replace it.

Coastal Sage Scrub—California Sagebrush-dominated. California sagebrush-dominated coastal sage scrub is the typical form of sage scrub. California sagebrush is the most abundant species, but there is usually a fair diversity, with black sage, California adolphia, flat-top buckwheat (*Eriogonum fasciculatum*), scattered lemonadeberry, bladderpod (*Isomeris arborea*), and cacti: coast prickly-pear (*Opuntia littoralis*), pancake prickly-pear (*Opuntia oricola*), coast cholla (*Opuntia prolifera*), and coast barrel cactus. This community is usually relatively open, and includes many herbaceous species, especially native needlegrasses (*Nasella* spp.), with fringed spine-flower (*Chorizanthe fimbriata*), prostrate spine-flower (*Chorizanthe procumbens*), southern rosinweed (*Osmadenia tenella*), fascicled or golden tarweed (*Hemizonia fasciculata*), Nuttall's snapdragon (*Antirrhinum nuttallianum*), California wood-sorrel (*Oxalis albicans*), owlslover (*Castilleja* spp., formerly *Orthocarpus* spp.), and arroyo lupine (*Lupinus succulentus*).

In Pacific Highlands Ranch, California sagebrush-dominated coastal sage scrub covers 13.1 acres and occurs locally, mainly on gently south-facing slopes in the western and southern part of the area.

Coastal Sage Scrub—California Adolphia-dominated. California adolphia-dominated coastal sage scrub is the least widely distributed of the sage scrub types; it occurs in California only in coastal San Diego County, and does not extend northwards into Orange County. It is dominated by the low-growing spiny shrub California adolphia, but also contains California sagebrush, black sage, and other typical sage scrub elements. Like California sagebrush-dominated coastal sage scrub, this community is relatively open, and it includes many of the same herbaceous species. Some key species in this community are ladies-fingers (*Dudleya edulis*), odora (*Porophyllum gracile*), California wood-sorrel, mesa saxifrage (*Jepsonia parryi*), bird's foot cliff-brake, and giant needlegrass (*Achnatherum coronatum*).

In Pacific Highlands Ranch, California adolphia-dominated coastal sage scrub covers approximately three acres and occurs mainly in relatively small patches. They generally occupy the upper parts of south-facing slopes, in dry, exposed situations. However, there is one larger area, on the south side of Santa Monica Ridge.

Coastal Sage Scrub—Mixed. This community consists of coastal sage scrub with two, or usually three co-dominant species from among California sagebrush, black sage, California adolphia, flat-top buckwheat, and lemonadeberry. It covers 12.3 acres in the south of Pacific Highlands Ranch.

Coastal Sage Scrub—Disturbed. Coastal sage scrub has been defined as disturbed when only some 50–75 percent of ground cover comprises coastal sage scrub shrubs and subshrubs. Often the subshrubs include a high percentage of deerweed (*Lotus scoparius*). The intervening areas are more or less weedy annual grassland, with such species as sand mat (*Cardionema ramosissimum*), windmill pink (*Silene gallica*), tower mustard (*Arabis glabra*), Australian saltbush (*Atriplex semibaccata*), and even gazania (*Gazania linearis*). There are scattered patches of disturbed coastal sage scrub covering a total of 8.0 acres throughout Pacific Highlands Ranch.

Coastal Sage Scrub—Annual Grassland transition. This community completes the transition from coastal sage scrub to grassland. It consists of grassland with an open cover of between 15 percent and 50 percent of shrubs. The principal shrub present is California sagebrush, often with deerweed, and minor coast goldenbush (*Isocoma menziesii*) and cudweed-aster (*Lessingia filaginifolia* var. *virgata*). The grassland component is the same as the annual grassland described below; it is dominated by wild oats (*Avena* spp.), with lesser Italian ryegrass (*Lolium multiflorum*) and locally ripgut grass (*Bromus diandrus*), soft chess (*Bromus hordaceus*), or foxtail chess (*Bromus madritensis* ssp. *rubens*). Important weeds include black mustard (*Brassica nigra*), and tocalote (*Centaurea melitensis*). There are scattered patches of coastal sage scrub—annual grassland transition covering a total of 8.3 acres throughout Pacific Highlands Ranch.

Coyote Bush Scrub. Coyote bush scrub is heavily dominated by coyote bush (*Baccharis pilularis*), and also contains tree tobacco (*Nicotiana glauca*), and minor amounts of California sagebrush, pampas grass (*Cortaderia* sp.), and tarragon (*Artemisia dracunculus*). The understory includes annual introduced grasses, saltgrass (*Distichlis spicata*), and clustered dock (*Rumex conglomeratus*).

Coyote bush scrub is typically found along valley bottoms where the water table is relatively high. Within Pacific Highlands Ranch this community covers 3.7 acres. It occurs at scattered locations in many of the small drainages.

Riparian Scrub

Southern Willow Scrub. Southern willow scrub is a riparian scrub; that is, it occurs along stream courses. The shrubs are dominated by arroyo willow (*Salix lasiolepis*), with lesser amounts of red willow (*Salix laevigata*) and black willow (*Salix gooddingii*). Also present are Mexican elderberry (*Sambucus mexicana*) and tree tobacco, with occasional weedy introductions including castor bean (*Ricinus communis*), tamarisk (*Tamarix* sp.), giant reed (*Arundo donax*), and pampas grass. The herbaceous understory consists of Mexican tea (*Chenopodium ambrosioides*), California mugwort (*Artemisia douglasiana*), and curly dock (*Rumex crispus*), with, in the eastern part of McGonigle Canyon, the sensitive species San Diego marsh-elder (*Iva hayesiana*). Wetland species occur within

the actual watercourses, including grass poly (*Lythrum hyssopifolia*), willow-weed (*Polygonum lapathifolium*), tall umbrella-sedge (*Cyperus eragrostis*), coastal bulrush (*Scirpus robustus*), wrinkled rush (*Juncus rugulosus*), and rabbitfoot grass (*Polypogon monspeliensis*).

In Pacific Highlands Ranch, southern willow scrub covers 17.6 acres and occurs in all the main drainages, and also locally in some minor ones. It is best developed in the eastern part of Gonzalez Canyon, in the eastern part of McGonigle Canyon, and near the pond in Deer Canyon.

Mule fat Scrub. Mule fat scrub is the other form of riparian scrub found in the area. The shrubs consist almost entirely of mule fat (*Baccharis salicifolia*), with occasional tree tobacco. The understory includes Mexican tea, cocklebur (*Xanthium strumarium*), curly dock, western ragweed (*Ambrosia psilostachya*), celery (*Apium graveolens*), and San Diego marsh-elder, together with annual introduced grasses. Wetland species within the actual watercourses include African brass-buttons (*Cotula coronopifolia*), grass poly, coastal bulrush, and rabbitfoot grass.

In Pacific Highlands Ranch, mule fat scrub covers a total of 10.4 acres and alternates with southern willow scrub along all the watercourses, and predominates in western Gonzalez and McGonigle Canyons.

Coastal and Valley Freshwater Marsh. Coastal and valley freshwater marsh occurs in waterlogged areas, usually with standing water, as around the edges of ponds. It is dominated by California bulrush (*Scirpus californicus*) and cattails (*Typha angustifolia* and *Typha latifolia*), tall monocots (grass-like plants) that can grow to 12 feet high. Minor components include tall umbrella-sedge, California cottonweed (*Epilobium ciliatum* ssp. *ciliatum*), and grass poly.

In Pacific Highlands Ranch, coastal and valley freshwater marsh covers 3.0 acres and is found mainly bordering the two ponds in the southern part of the area, in McGonigle Canyon and Deer Canyon. There are also patches in the small north-south drainage in the western part of the area.

Open Water. Open water is present in two ponds within Pacific Highlands Ranch, one in the western part of McGonigle Canyon, and the other in Deer Canyon. They are surrounded by coastal and valley freshwater marsh, and southern willow scrub, but themselves contain no vascular plants.

Woodland Vegetation

Southern Sycamore Riparian Woodland. This community occurs along flat valley bottoms, where the water table is near to the surface. Western sycamore (*Platanus*

racemosa) is the dominant species, forming large open trees. Many of the sycamores have parasitic colonies of big leaf mistletoe (*Phoradendron macrophyllum*). Understory shrubs are mainly poison oak, with minor Mexican elderberry and mule fat. In Pacific Highlands Ranch, there are several small stands of southern sycamore riparian woodland along the western parts of McGonigle and Deer canyons, in the southern part of the area. There is also sycamore woodland along Gonzalez Canyon in the Del Mar Highlands portion of the subarea. These areas total 2.8 acres.

Eucalyptus Woodland. Eucalyptus woodland is overwhelmingly dominated by eucalyptus (*Eucalyptus* sp.) trees, introduced from Australia. These fast-growing trees produce a large amount of leaf and bark litter, which prevents other species from growing in the understory. Although originally planted by man, these eucalyptus have become naturalized and are spreading in moist areas near the drainages. In Pacific Highlands Ranch, this community covers 14.8 acres in the eastern part of McGonigle Canyon and the western part of Gonzalez Canyon, and on the northern boundary of the area. There are also several planted lines of eucalyptus on the upland parts of the area.

Grasslands Vegetation

Annual Grassland. Annual grassland is dominated by introduced Mediterranean grasses, chiefly wild oats along with lesser Italian ryegrass, foxtail chess, soft chess, and ripgut grass. It contains some native species such as blue-eyed grass (*Sisyrinchium bellum*), common golden stars (*Bloomeria crocea*), stinging lupine (*Lupinus hirsutissimus*), tomcat clover (*Trifolium willdenovii*), and dove weed (*Eremocarpus setigerus*), but the most abundant non-grasses are also introduced weeds: black mustard, totalote, smooth cat's-ear (*Hypochaeris glabra*), and bur-clover (*Medicago polymorpha*). Undisturbed grassland is rare within Pacific Highlands Ranch, as most grassy areas are regularly disked for agriculture. Annual grassland has been mapped in a few patches in the south of the area, and adjacent to Gonzalez Canyon in the northwest of the area.

Native Grassland. Native grassland is grassland where at least 10 percent of the cover is made up of purple needlegrass (*Nasella pulchra*). Other grasses are also present, as in the annual grassland, especially wild oats, Italian ryegrass, and foxtail chess. Native grassland hosts a rich non-grass flora of wildflowers, including common golden stars, blue dicks (*Dichelostemma capitatum*), blue-eyed grass, lilac mariposa lily (*Calochortus splendens*), southern rosinweed, golden daisy, canchalagua (*Centaurium venustum*), checker bloom (*Sidalcea malvaeflora*), four-spot or winecup clarkia (*Clarkia purpurea*), and Padres' shooting star (*Dodecatheon clevelandii*). There are also larger, more or less woody plants such as coast goldenbush and gumplant (*Grindelia camporum*).

In Pacific Highlands Ranch, native grassland is confined to a few small openings on north-facing slopes covering 1.6 acres. It has been mapped only at two locations in the

northwest of the area, and two more in the extreme south of the area. There are many more occurrences, too small to map.

Ruderal

Ruderal habitat is indicative of disturbed areas. It is dominated by coarse weedy introduced broad-leaved species, especially black mustard, perennial mustard (*Hirschfeldia incana*), lamb's quarters (*Chenopodium album*), Russian thistle (*Salsola tragus*), and horehound (*Marrubium vulgare*). Other common species are common sow-thistle (*Sonchus oleraceus*), twiggy wreathplant (*Stephanomeria virgata*), wild radish (*Raphanus sativus*), white sweet-clover (*Melilotus alba*), yellow sweet-clover (*Melilotus indica*), cheeseweed (*Malva parviflora*), jimsonweed (*Datura wrightii*), and dwarf nettle (*Urtica urens*).

In Pacific Highlands Ranch, ruderal vegetation covers 126.7 acres and has been mapped mainly in formerly disked agricultural areas. Some areas designated as ruderal have been cleared for development, but have been left alone allowing vegetation to return.

Disked/Agricultural

The majority of Pacific Highlands Ranch is regularly disked. At different seasons, parts of this disked area are used for agriculture (tomatoes, peppers, etc.), while other areas are allowed to grow weeds. Depending on the season, these areas may be open ground, or they may be occupied by a variety of mainly introduced species. These species include principally the grasses soft chess, foxtail chess, ripgut grass, Bermuda grass (*Cynodon dactylon*), and barley (*Hordeum* spp.), and the non-grasses sweet fennel (*Foeniculum vulgare*), common horseweed (*Conyza canadensis*), cardoon (*Cynara cardunculus*), telegraph weed (*Heterotheca grandiflora*), prickly lettuce (*Lactuca serriola*), bristly ox-tongue (*Picris echioides*), lesser wart-cress (*Coronopus didymus*), spurrey (*Spergula arvensis*), poison hemlock (*Conium maculatum*), and common purslane (*Portulaca oleracea*).

In Pacific Highlands Ranch, the disked/agricultural designation covers 1,320.3 acres and has been applied to the majority of the area, including most flat land and gentle slopes, except for the mesa tops in the extreme south and southeast of the area.

Graded

The graded designation has been applied to freshly graded areas where significant amounts of dirt have been either scraped off or added, so that regeneration of the original vegetation is unlikely. The main graded area at the time of the survey was in the southwest of Pacific Highlands Ranch. These areas cover 3.6 acres.

Developed

Developed habitat includes buildings, pavement and roads, nurseries, and storage yards. Plant species present are exotics that have been planted for ground cover, as along roadsides adjacent to new homes. In Pacific Highlands Ranch, developed habitat covers 10.4 acres and has been mapped at several points around the perimeter, where adjacent developed areas, often stabilized artificial slopes, extend into the area. There is a large agricultural storage yard in the southwest of the area. On non-Pardee acreage, there are developed areas (homes, stables, nurseries) in the extreme west of the area, and in the north-south strip in the eastern part of the area.

b) Wildlife

The coastal sage scrub, chaparral, grassland, riparian scrub, and eucalyptus woodland habitats that are present on-site provide ample foraging and cover habitat for a variety of vertebrate and invertebrate species. A list of vertebrate species that were observed during the surveys is provided in Appendix C1. A description of the wildlife observed using this site during the surveys is provided below.

Amphibians

Water is present on the site on a seasonal basis, and very few amphibians are expected to occur on-site and none were detected during the current surveys. Amphibian species that may occupy the site include the western toad (*Bufo borelas*) Pacific slender salamander (*Batrachoseps pacificus*), and California chorus frog (*Pseudacris cadaverina*).

Reptiles

Reptiles detected during the surveys of the site include the western fence lizard (*Sceloporus occidentalis*), side-blotched lizard (*Uta stansburiana*), orange-throated whiptail (*Cnemidophorus hyperythrus*), and striped racer (*Masticophis lateralis*).

The following secretive reptile species could potentially occur on the site: western skink (*Eumeces skiltonianus*), silvery legless lizard (*Anniella pulchra pulchra*), western blind snake (*Leptotyphlops humilis*), night snake (*Hypsiglena torquata*), glossy snake (*Arizona elegans*), San Diego ringneck snake (*Diadophis punctatus similis*), western black-headed snake (*Tantilla planiceps*), and lyre snake (*Trimorphodon biscutatus*).

The following reptile species potentially occur on the site and prefer open habitats, or move between areas of dense cover and open areas: coastal western whiptail (*Cnemidophorus tigris multiscutatus*), racer (*Coluber constrictor*), common kingsnake (*Lampropeltis getulus*), northern red diamond rattlesnake (*Crotalus ruber ruber*), coastal rosy boa (*Lichanura trivirgata rosafusca*), coachwhip (*Masticophis flagellum*), and coast patch-nosed snake (*Salvadora hexalepis virgultea*).

Birds

Birds commonly observed on-site include California quail (*Callipepla californica*), mourning dove (*Zenaida macroura*), greater roadrunner (*Geococcyx californianus*), Anna's hummingbird (*Calypte anna*), Cassin's kingbird (*Tyrannus vociferans*), cliff swallow (*Hirundo pyrrhonota*), scrub jay (*Aphelocoma coerulescens*), bushtit (*Psaltiriparus minimus*), Bewick's wren (*Thryomanes bewickii*), wrentit (*Chamaea fasciata*), northern mockingbird (*Mimus polyglottos*), California thrasher (*Toxostoma redivivum*), rufous-sided towhee (*Pipilo erythrophthalmus*), California towhee (*Pipilo crissalis*), grasshopper sparrows (*Ammodramus savannarum*), song sparrows (*Melospiza melodia*), white-crowned sparrows (*Zonotrichia leucophrys*), and lesser goldfinches (*Carduelis psaltria*).

In addition, numerous raptors were observed foraging on site, including turkey vulture (*Cathartes aura*), white-tailed kite (*Elanus leucurus*), northern harrier (*Circus cyaneus*), Cooper's hawk (*Accipiter cooperii*), and red-tailed hawk (*Buteo jamaicensis*).

Mammals

The mammal fauna of the project site is also typical of coastal San Diego County. Mammals directly observed, or for whom diagnostic surface sign was found, included desert cottontail (*Sylvilagus audubonii*), black-tailed jackrabbit (*Lepus californicus*), California ground squirrel (*Spermophilus beecheyi*), Botta's pocket gopher (*Thomomys bottae*), woodrat (*Neotoma* sp.), coyote (*Canis latrans*), bobcat (*Lynx rufus*), and mule deer (*Odocoileus hemionus*).

Other common mammals likely to occur on-site, but not directly observed, include the Virginia opossum (*Didelphis virginiana*), brush rabbit (*Sylvilagus bachmani*), California pocket mouse (*Chaetodipus californicus*), Pacific kangaroo rat (*Dipodomys agilis*), western harvest mouse (*Reithrodontomys megalotis*), brush mouse (*Peromyscus boylii*), California mouse (*Peromyscus californicus*), cactus mouse (*Peromyscus eremicus*), deer mouse (*Peromyscus maniculatus*), house mouse (*Mus musculus*), California vole (*Microtus californicus*), gray fox (*Urocyon cinereoargenteus*), raccoon (*Procyon lotor*), and striped skunk (*Mephitis mephitis*). In addition, the site may provide foraging habitat for numerous bat species including evening bats (Vespertilionidae) and free-tailed bats (Molossidae).

c) Sensitive Biological Resources

The sensitive vegetation communities and species that have been detected on the Pacific Highlands Ranch site, and the species that have been found to occur in the vicinity of the site, are discussed in this section and shown in Figure 4C-2. A complete list of sensitive plant and wildlife species occurring or potentially occurring on-site is presented in Table 4C-2. Table 4C-3 defines the sensitivity codes used in Table 4C-2.



(See Sheet 2)

- Adolphia - Adolphia californica (AC)
- Del Mar Manzanita - Arctostaphylos glandulosa ssp. crassifolia (AG)
- Palmer's sagebrush - Artemisia palmeri (AP)
- Calandrinia breweri (CB)
- Summer Holly - Comarostaphylis diversifolia ssp. diversifolia (CD)
- Dichondra - Dichondra occidentalis (DO)
- San Diego barrel cactus - Ferocactus viridescens (FV)
- Palmer's grapplinghook - Harpagonella palmeri (HP)
- HV
- San Diego marsh-elder - Iva hayesiana (IH)
- Grass poly - Lythrum hyssopifolia (LH)
- San Diego golden star - Muilla clevelandii (MC)
- California Plantain - Plantago erecta (PE)
- Slender woolly-heads - Psilocarphus tenellus (PT)
- Nuttall's scrub oak - Quercus dumosa (QD)
- Pygmy spikemoss - Selaginella cinerascens (SC)

1600 800 FEET 0



Source: Project Design Consultants, 1997

FIGURE 4C-2
Sensitive Plant Species
Northern Portion

TABLE 4C-2
SENSITIVE PLANT AND WILDLIFE SPECIES DETECTED AND NOT DETECTED ON THE SUBAREA III SITE

Species Name	Status			Occurrence Status On-Site
	USFWS	CDFG	Other*	
Plants				
<i>Acanthomintha ilicifolia</i> † San Diego thornmint	FPE	CE	List 1B	Not detected on-site.
<i>Adolphia californica</i> California adolphia	--	--	List 2	Not detected on-site.
<i>Arctostaphylos glandulosa</i> ssp. <i>Crassifolia</i> Del Mar manzanita	FE	--	List 1B	Detected on-site. NRC recorded approximately 11 clusters of Del Mar Manzanita totaling approximately 425 trees.
<i>Artemisia palmeri</i> San Diego sagewort	--	--	List 2	Detected on site. On-site, this species occurs abundantly, with over 1,100 individuals, along the course of the McGonigle Canyon and its tributaries, all the way from the extreme southwest of the area across to the eastern boundary.
<i>Atriplex pacifica</i> South Coast saltscale	FSC	--	List 1B	Not detected on-site.
<i>Baccharis vanessae</i> † Encinitas baccharis	FPE	CE	List 1B	Not detected on-site.
<i>Bergerocactus emoryi</i> Golden-spined cereus	--	--	List 2	Not detected on-site.
<i>Brodiaea filifolia</i> Thread-leaved brodiaea	FPT	CE	List 1B	Not detected on-site.
<i>Brodiaea orcuttii</i> Orcutt's brodiaea	FSC	--	List 1B	Not detected on-site.
<i>Calandrinia brewerei</i> Brewer's calandrinia	--	--	List 4	Detected on-site. One specimen was found in the northwest portion of the site.

TABLE 4C-2
SENSITIVE PLANT AND WILDLIFE SPECIES DETECTED AND NOT DETECTED ON THE SUBAREA III SITE
(continued)

Species Name	Status			Occurrence Status On-Site
	USFWS	CDFG	Other*	
Plants (cont.)				
<i>Ceanothus verrucosus</i> White coast ceanothus	FSC	--	List 2	Detected on-site. This species was detected throughout the chaparral vegetation, and scattered within the disturbed coastal sage scrub vegetation. Tens of thousands of ceanothus occur on-site.
<i>Chorizanthe orcuttiana</i> Orcutt's spineflower	FE	CE	List 1B	Not detected on-site.
<i>Chorizanthe polygonoides</i> var. <i>longispina</i> Long-spined spineflower	FSC	--	List 1B	Not detected on-site.
<i>Chorizanthe procumbens</i> Prostrate spineflower	--	--	List 4	Detected on-site; this species was detected in disturbed coastal sage scrub and disturbed coastal sage scrub/non-native grassland vegetation, and was associated with sandy soils.
<i>Comarostaphylos diversifolia</i> ssp. <i>diversifolia</i> Summer holly	FSC	--	List 1B	Detected on-site as common component of chaparral habitats.
<i>Coreopsis maritima</i> Sea dahlia	--	--	List 2	Not detected on-site.
<i>Corethrogyne filaginifolia</i> var. <i>incana</i> San Diego sand aster	--	--	List 1B	Not detected on-site.
<i>Corethrogyne filaginifolia</i> var. <i>linifolia</i> Del Mar sand aster	FPT	--	List 1B	Not detected on-site.
<i>Dichondra occidentalis</i> Western dichondra	--	--	List 4	Detected on-site. This species is widely distributed on-site, especially on Shaw Ridge in the south of the area, and on the slopes of the Gonzales Canyon drainage in the west-center of the area.

TABLE 4C-2
SENSITIVE PLANT AND WILDLIFE SPECIES DETECTED AND NOT DETECTED ON THE SUBAREA III SITE
(continued)

Species Name	Status			Occurrence Status On-Site
	USFWS	CDFG	Other*	
Plants (cont.)				
<i>Dudleya blochmaniae</i> ssp. <i>brevifolia</i> † Short-leaved dudleya	FPE	CE	List 1B	Not detected on-site.
<i>Dudleya variegata</i> Variegated dudleya	FSC	--	List 2	Not detected on-site.
<i>Eryngium aristulatum</i> var. <i>parishii</i> San Diego button-celery	FSC	CE	List 1B	Not detected on-site.
<i>Ferocactus viridescens</i> Coast barrel cactus	FSC	--	List 2	Detected on-site. About 1,500 individuals are present in south-facing situations as described, at locations distributed throughout the area.
<i>Grindelia hirsutula</i> var. <i>hallii</i> San Diego gumplant	--	--	List 1B	Not detected on-site.
<i>Harpagonella palmeri</i> Palmer's grapplinghook	FSC	--	List 2	Detected on-site. This species was detected by SEB in 1993 but was not observed by NRC in 1997.
<i>Iva hayesiana</i> San Diego marsh-elder	FSC	--	List 2	Detected on-site. A total of 26 clumps were counted, two factors make this a low estimate: the spreading clumps likely contain several individual plants each, and more clumps are probably present in the riparian vegetation along the canyon.
<i>Monardella linoides</i> ssp. <i>viminea</i> Willow monardella	FPE	CE	List 1B	Not detected on-site.
<i>Muilla clevelandii</i> San Diego goldenstar	FSC	--	List 1B	Detected on-site. One specimen was identified on-site in southern mixed chaparral on Santa Monica Ridge, close to the eastern boundary of the site.
<i>Ophioglossum californicum</i> California adder's-tongue fern	--	--	List 4	Not detected on-site.

TABLE 4C-2
SENSITIVE PLANT AND WILDLIFE SPECIES DETECTED AND NOT DETECTED ON THE SUBAREA III SITE
(continued)

Species Name	Status			Occurrence Status On-Site
	USFWS	CDFG	Other*	
Plants (cont.)				
<i>Orobanche parishii</i> ssp. <i>brachyloba</i> Short-lobed broomrape	--	--	List 1B	Not detected on-site.
<i>Pinus torreyana</i> ssp. <i>torreyana</i> Torrey pine	FSC	--	List 1B	Not detected on-site.
<i>Pogogyne abramsii</i> † San Diego mesa mint	FE	CE	List 1B	Not detected on-site.
<i>Quercus dumosa</i> Nuttall's scrub oak	FSC	--	List 1B	Detected on-site; this species was detected throughout the chaparral vegetation.
<i>Selaginella cinerascens</i> Ashy spike-moss	--	--	List 4	Detected on-site; this species was detected within the southern maritime chaparral, disturbed coastal sage scrub, and disturbed non-native grassland/coastal sage scrub communities.
Invertebrates				
<i>Euphydryas editha quino</i> Quino checkerspot	FE	--	--	Food plant (<i>Plantago erecta</i>) detected on-site. No Quino checkerspot detected on-site
<i>Branchinecta sandiegoensis</i> San Diego fairy shrimp	FPE	CSA	--	Not detected on-site.
<i>Streptocephalus woottoni</i> Riverside fairy shrimp	FE	CSA	--	Not detected on-site.
Amphibians				
<i>Scaphiopus hammondi</i> Western spadefoot	FSC	CSC	SDSS	Not detected on-site.

TABLE 4C-2
SENSITIVE PLANT AND WILDLIFE SPECIES DETECTED AND NOT DETECTED ON THE SUBAREA III SITE
(continued)

Species Name	Status			Occurrence Status On-Site
	USFWS	CDFG	Other*	
Reptiles				
<i>Aniella pulchra pulchra</i> Silvery legless lizard	FSC	CSC	SDSS	Not detected on-site.
<i>Cnemidophorus hyperythrus</i> Orange-throated whiptail	FSC	CSC	SDSS	Detected on-site; two orange-throated whiptail were detected in 1993 within ecotonal habitats adjacent to southern willow scrub habitat and one in 1997 within coastal sage scrub.
<i>Cnemidophorus tigris multiscutatus</i> Coastal western whiptail	FSC	CSA	--	Not detected on-site.
<i>Crotalus ruber ruber</i> Northern red-diamond rattlesnake	FSC	CSC	--	Not detected on-site.
<i>Eumeces skiltonianus interparietalis</i> Coronado skink	FSC	CSC	--	Not detected on-site.
<i>Diadophis punctatus similis</i> San Diego ringneck snake	FSC	CSA	--	Not detected on-site.
<i>Lichanura trivirgata rosafusca</i> Coastal rosy boa	FSC	CSA	SDSS	Not detected on-site.
<i>Phrynosoma coronatum blainvillei</i> San Diego horned lizard	FSC	CSC	SDSS	Not detected on-site.
<i>Salvadora hexalepis virgulata</i> Coast patch-nosed snake	FSC	CSC	--	Not detected on-site.
<i>Thamnophis hammondi</i> Two-striped garter snake	FSC	CSA	SDSS	Not detected on-site.

TABLE 4C-2
SENSITIVE PLANT AND WILDLIFE SPECIES DETECTED AND NOT DETECTED ON THE SUBAREA III SITE
(continued)

Species Name	Status			Occurrence Status On-Site
	USFWS	CDFG	Other*	
Birds				
<i>Accipiter cooperii</i> Cooper's hawk	--	CSC	--	Detected on-site; this species was detected foraging over the site.
<i>Accipiter striatus</i> Sharp-shinned hawk	--	CSC	--	Detected on-site; this species was detected foraging over the site.
<i>Ammodramus savannarum</i> Grasshopper sparrow	--	--	SDSS	Detected on-site; three grasshopper sparrows were detected in 1997 within southern mixed chaparral habitat.
<i>Aimophila ruficeps canescens</i> S. California rufous-crowned sparrow	FSC	CSC	--	Detected on-site; this species was detected within the coastal sage scrub, disturbed coastal sage scrub, and disturbed coastal sage scrub/non-native grassland communities.
<i>Amphispiza belli belli</i> Bell's sage sparrow	FSC	CSC	SDSS	Detected on-site; three Bell's sage sparrows were detected in 1997 within southern mixed chaparral.
<i>Cathartes aura</i> Turkey vulture	--	--	SDSS	Detected on-site; this species was detected foraging over the site.
<i>Chordeiles acutipennis</i> Lesser nighthawk	--	--	SDSS	Detected on-site; this species was detected within the southern maritime chaparral.
<i>Circus cyaneus</i> Northern harrier	--	CSC	SDSS	Not detected on-site.
<i>Dendroica petechia</i> Yellow warbler	--	CSC	SDSS	Not detected on-site.
<i>Elanus leucurus</i> White-tailed kite	--	CSA	SDSS	Detected on-site; this species was detected foraging over the site in 1993 and 1997.
<i>Eremophila alpestris actia</i> California horned lark	FSC	CSC	--	Detected on-site in 1997 along the dirt roads located within coastal sage scrub community.

TABLE 4C-2
SENSITIVE PLANT AND WILDLIFE SPECIES DETECTED AND NOT DETECTED ON THE SUBAREA III SITE
(continued)

Species Name	Status			Occurrence Status On-Site
	USFWS	CDFG	Other*	
Birds (cont.)				
<i>Geococcyx californianus</i> Greater roadrunner	--	--	SDSS	Not detected on-site.
<i>Icteria virens</i> Yellow-breasted chat	--	CSC	SDSS	Not detected on-site.
<i>Lanius ludovicianus</i> Loggerhead shrike	FSC	CSC	--	Detected on-site within chaparral habitat in 1993 and 1997..
<i>Poliophtila californica californica</i> California gnatcatcher	FT	CSC	SDSS	Two pairs detected on-site within coastal sage scrub habitats in the northwestern corner of the site in 1997. One pair and three individuals were located in the same location in 1993. Two pairs were located in the same location in the eastern portion of the site in 1993 and again in the same location in 1996.
<i>Speotyto cunicularia hypugaea</i> Western burrowing owl	--	CSC	SDSS	Not detected on-site.
Mammals				
<i>Antrozous pallidus</i> Pallid bat	--	CSC	--	Not detected on-site.
<i>Chaetodipus fallax fallax</i> Northwestern San Diego pocket mouse	FSC	CSC	--	Not detected on-site.
<i>Choeronycteris mexicana</i> Mexican long-tongued bat	FSC	CSC	--	Not detected on-site.
<i>Euderma maculatum</i> Spotted bat	FSC	CSC	--	Not detected on-site.

TABLE 4C-2
SENSITIVE PLANT AND WILDLIFE SPECIES DETECTED AND NOT DETECTED ON THE SUBAREA III SITE
(continued)

Species Name	Status			Occurrence Status On-Site
	USFWS	CDFG	Other*	
Mammals (cont.)				
<i>Eumops perotis californicus</i> Greater western mastiff bat	FSC	CSC	--	Not detected on-site.
<i>Felis concolor</i> Mountain lion	--	CFP	--	Not detected on-site.
<i>Lepus californicus bennettii</i> San Diego black-tailed jackrabbit	FSC	CSC	--	Detected on-site; this species was detected within the disturbed coastal sage scrub habitats.
<i>Myotis evotis</i> Long-eared myotis	FSC	--	--	Not detected on-site.
<i>Myotis volans</i> Long-legged myotis	FSC	--	--	Not detected on-site.
<i>Myotis yumanensis</i> Yuma myotis	FSC	--	--	Not detected on-site
<i>Neotoma lepida intermedia</i> San Diego desert woodrat	FSC	CSC	--	Not detected on-site.
<i>Onychomys torridus ramona</i> Southern grasshopper mouse	FSC	CSC	--	Not detected on-site.
<i>Perognathus longimembris pacificus</i> Pacific pocket mouse	FE	CSC	--	Not detected on-site.
<i>Plecotus townsendii</i> Townsend's big-eared bat	--	CSC	SDSS	Not detected on-site.

NOTE: See Table 4E-3 for explanation of sensitivity codes.

*California Native Plant Society - this designation is only applicable to plant species.

†Narrow endemic species

**TABLE 4C-3
SENSITIVITY CODES**

FEDERAL CANDIDATES AND LISTED PLANTS

- FE = Federally listed, endangered
FT = Federally listed, threatened
FPE = Federally proposed endangered
FPT = Federally proposed threatened

STATE LISTED PLANTS

- CE = State listed, endangered
CR = State listed, rare
CT = State listed, threatened

CALIFORNIA NATIVE PLANT SOCIETY

LISTS

- 1A = Species presumed extinct.
- 1B = Species rare, threatened, or endangered in California and elsewhere. These species are eligible for state listing.
- 2 = Species rare, threatened, or endangered in California but which are more common elsewhere. These species are eligible for state listing.
- 3 = Species for which more information is needed. Distribution, endangerment, and/or taxonomic information is needed.
- 4 = A watch list of species of limited distribution. These species need to be monitored for changes in the status of their populations.

R-E-D CODES

R (Rarity)

- 1 = Rare, but found in sufficient numbers and distributed widely enough that the 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)

- 1 = Not endangered
2 = Endangered in a portion of its range
3 = Endangered throughout its range

D (Distribution)

- 1 = More or less widespread outside California
2 = Rare outside California
3 = Endemic to California

Sensitive Plant Species-Observed

Sensitive plant species occurring or potentially occurring on the project site are summarized in Table 4C-2. This table provides the listing status and presence or potential occurrence on the subject site. The location of observed sensitive plants is shown in Figure 4C-2. The profiles below provide the listing status, distribution, habitat type, growth form, and blooming period, along with additional information on distribution and threats.

Del Mar manzanita (*Arctostaphylos glandulosa* ssp. *crassifolia*). This shrub is a federally endangered species, a MSCP-covered species, and is on List 1B of the California Native Plant Society (CNPS) inventory. It is confined to sandstone bluffs in chaparral in coastal San Diego County (Carlsbad to Torrey Pines, and inland to Del Mar Mesa) and locally in adjacent northern Baja California. It is threatened by loss of chaparral habitat, partly by conversion to agriculture, but principally by development. It usually grows on north-facing slopes, and occurs on-site at 17 such locations, totaling 425 individuals. Locations include Shaw Ridge in the extreme south of the area, the slopes of the Gonzalez Canyon drainage in the west-center of the area, and the steep slopes that form the northern boundary of Pacific Highlands Ranch.

White coast ceanothus, wart-stemmed lilac (*Ceanothus verrucosus*). This shrub is a former federal Category 2 candidate, a MSCP-covered species, and is on List 2 of the CNPS inventory. It occurs in chaparral close to the coast, and ranges from Encinitas south to San Diego, and on into northern Baja California. It is threatened by loss of chaparral habitat to development. It occurs in southern maritime chaparral on-site in the southwest of the area (Shaw Ridge), and sporadically south of Gonzalez Canyon in the west-center of the area. However, the most important population is the one totaling tens of thousands of individuals, which occupies and dominates the north-facing slopes in the northeast of the area.

Summer holly (*Comarostaphylis diversifolia* ssp. *diversifolia*). This tall shrub is a former federal category 2 candidate, and is on List 1B of the CNPS inventory. It is not a MSCP-covered species. It grows on dry slopes near the coast in southern mixed chaparral, scrub oak chaparral, and southern maritime chaparral, most often in sheltered gullies, and least often on south-facing slopes. Populations range from Baja California north as far as Encinitas, and a few individuals are known from further north (Camp Pendleton to Laguna Niguel in Orange County). It is threatened principally by loss of chaparral habitat to development. Over 4,000 individuals are present on-site, in numerous populations scattered throughout suitable chaparral habitat.

San Diego barrel cactus, coast barrel cactus (*Ferocactus viridescens*). This small (less than one-foot-high) barrel cactus is a former federal Category 2 candidate, a MSCP-covered species, and is on List 2 of the CNPS Inventory. It occurs principally on dry,

sparsely vegetated, south-facing slopes in chaparral and coastal sage scrub. In California, it is confined to southwestern San Diego County, where it ranges south from Encinitas to Point Loma and Otay Mesa, and inland to Poway. It is threatened principally by development, and also by off-road vehicles. About 1,500 individuals are present on-site in south-facing situations as described, at locations distributed throughout the area. The largest single populations are on Santa Monica Ridge towards the south-center of the area, but similar numbers occupy the slopes of the Gonzalez Canyon drainage, and the canyons that cut the northern boundary of the area.

Palmer's grapplinghook (*Harpagonella palmeri*). This inconspicuous, low-growing annual is a former federal Category 2 candidate, a MSCP-covered species, and is on List 2 of the CNPS Inventory. It grows sporadically in openings in coastal sage scrub, and ranges south from Riverside and Orange Counties into Baja California and Sonora, Mexico. It is threatened by development. This species was not found during this year's surveys, but it has been encountered in the past, and the early, dry, nature of this season is probably the reason for its apparent absence.

San Diego marsh-elder (*Iva hayesiana*). This fleshy-leaved low-growing subshrub is a former federal Category 2 candidate, and is on List 2 of the CNPS Inventory. It is not a MSCP-covered species. It grows in moist or alkaline places near the coast, including along intermittent streams, ranging from Rancho Santa Fe south through San Diego to adjacent Baja California. It is threatened by waterway channelization and coastal development. On-site, this species occurs in the southern willow scrub along McGonigle Canyon in the eastern part of the area. A total of 26 clumps were counted, but two factors make this a low estimate: first, the spreading clumps likely contain several individual plants each, and second, more clumps are probably present, hidden in the dense riparian vegetation along the canyon.

San Diego golden star, Cleveland's golden star (*Muilla clevelandii*). This perennial herb, growing from a bulb, is a former federal Category 2 candidate, a MSCP-covered species, and is on List 1B of the CNPS Inventory. It grows very locally, on dry mesas and hillsides in chaparral and coastal sage scrub in southwest San Diego County and adjacent Baja California. It is threatened principally by urban development; few of its historic sites remain undeveloped. One specimen was identified on-site, in southern mixed chaparral on Santa Monica Ridge, close to the eastern boundary of the area. In wetter years, up to 15 individuals have been seen at this location.

Nuttall's scrub oak (*Quercus dumosa*). This intricately branched shrub is a former federal Category 2 candidate, a regionally sensitive species in a "southern maritime chaparral listing package" from the U.S. Fish and Wildlife Service (USFWS), and is on List 1B of the CNPS inventory. It is not a MSCP-covered species. It is the dominant species in scrub oak chaparral, and also occurs in mixed chaparral, principally on north-facing slopes. It grows only within about six miles of the coast, rarely in Orange County,

commonly from Encinitas southwards in San Diego County, and in Baja California. It is threatened by development. On-site, scrub oak chaparral is especially important in Deer Canyon in the southeast portion of the area, where it occupies the entire valley bottom and much of the north-facing slope; it also occurs in smaller stands in the valleys of the north, the west-center, and the south of the area. In all these areas, Nuttall's scrub oak is the dominant species, and scattered individuals are also more widely distributed.

Potential Vernal Pool Indicator Species

Grass poly (*Lythrum hyssopifolia*). This small introduced annual is not sensitive per se, but it is on the U.S. Army Corps of Engineers (USACE) Vernal Pool List 6A. It is a potential indicator species of vernal pools (although it can occur in other damp locations, such as intermittent creek beds). It occurs at several locations on-site, all in the intermittent creek bed of Gonzalez Canyon, or in damp places supplied by leaking agricultural irrigation water. It does not indicate vernal pools at any of these locations.

Slender woolly-heads (*Psilocarphus tenellus*). This little woolly prostrate annual is not sensitive per se, but it is on the USACE Vernal Pool List 6A. It is a potential indicator species of vernal pools. It occurs in one population, about 100 feet off-site at the southeast corner of the area. At this location it occurs in a small depression an inch or so deep and about two feet across, but no other vernal pool indicator species were observed.

Other Species of Interest

California adolphia (*Adolphia californica*). This spiny, low-growing shrub is on List 2 of the CNPS Inventory, and is not a MSCP-covered species. It occurs in dry exposed locations, especially south-facing slopes in coastal sage scrub and chaparral, in western San Diego County from Carlsbad southwards, and in adjacent Baja California. On-site, it is the dominant species in the California adolphia-dominated coastal sage scrub vegetation community, and also occurs in smaller populations in other types of coastal sage scrub, and in southern maritime chaparral and southern mixed chaparral. In these environments it is found throughout Pacific Highlands Ranch, totaling thousands of individuals.

Palmer's sagewort, San Diego sagewort (*Artemisia palmeri*). This tall perennial, growing from a woody base, is on List 2 of the CNPS Inventory. It is not a MSCP-covered species. It grows in or close to moist drainages, often within chaparral at the base of north-facing slopes adjacent to creeks. It is found only in coastal San Diego County from Encinitas southwards, and in adjacent northwestern Baja California. In California, only about 20 occurrences are known. On-site, this species occurs abundantly, with over 1,100 individuals, along the course of McGonigle Canyon and its tributaries, all the way from the extreme southwest of the area across to the eastern boundary. A few individuals were also found on the northern boundary of Pacific Highlands Ranch.

Brewer's calandrinia (*Calandrinia breweri*). This low-growing annual is on List 4 of the CNPS inventory. It grows on sandy and gravelly soil, especially on former burns. It is not a MSCP-covered species. It is widely distributed throughout coastal California, but it is uncommon everywhere, and few current records exist. One specimen was found on-site, on an open gravel area in mixed chaparral in the northwest portion of the area.

Western dichondra (*Dichondra occidentalis*). This low-growing perennial herb is a federal Category 3c species, and is on List 4 of the CNPS Inventory. It is not a MSCP-covered species. It forms a ground cover below and between shrubs, principally in chaparral. It occurs only within two or three miles of the coast, and ranges from southern Orange County southwards into northern Baja California. It is widely distributed on-site, especially in the southern portion of Shaw Ridge.

California plantain (*Plantago erecta*). This small annual is not sensitive; however, it may provide habitat for the quino checkerspot butterfly (*Euphydryas editha quino*). Within the Pacific Highlands Ranch site this species grows in openings in chaparral and coastal sage scrub, and in grassland, and sometimes forms large populations. It is present on-site in 14 populations. Most of these are on the slopes of the Gonzalez Canyon drainage in the west-center of the area, but three are in the valleys along the northern boundary of the area, and one is on Shaw Ridge in the extreme southwest of the area. The quino checkerspot butterfly is not a MSCP-covered species.

Ashy spike-moss (*Selaginella cinerascens*). This tiny prostrate moss-like plant is on List 4 of the CNPS. It is not a MSCP-covered species. It carpets the ground in many openings in chaparral and coastal sage scrub, especially on flat mesa tops and gentle slopes. It is almost totally confined to coastal San Diego County and adjacent northwestern Baja California. It is ubiquitous on-site, in the habitats described above. It is especially abundant at the locations where it is marked on the map, but smaller occurrences are much too numerous to record individually.

Sensitive Wildlife Species—Observed

Eight sensitive wildlife species were observed on the Pacific Highlands Ranch property. The sensitive wildlife resources detected on the Pacific Highlands Ranch site are listed below. None of the species detected are listed by state or federal resource protection agencies as threatened or endangered.

Orange-throated whiptail (*Cnemidophorus hyperythrus beldingi*). The orange-throated whiptail is a federal species of concern, a California species of special concern, and included on the City of San Diego Sensitive Species List. Two individuals were detected on the Pacific Highlands Ranch site. Both adult lizards were observed in open areas within chaparral and disturbed coastal sage scrub communities. It is a MSCP-covered species.

Southern California rufous-crowned sparrow (*Aimophila ruficeps canescens*). The southern California rufous-crowned sparrow is a federal species of concern and a California species of special concern. Several individuals were detected within the Pacific Highlands Ranch site. This sparrow was observed in coastal sage scrub habitat in the southern portion of the site. It is a MSCP-covered species.

Turkey vulture (*Cathartes aura*). The turkey vulture is included on the City of San Diego Sensitive Species List. Three turkey vultures were observed foraging above the site in July of 1997. It is not a MSCP-covered species.

White-tailed kite (*Elanus leucurus*). The white-tailed kite is a California special animal and is included on the City of San Diego Sensitive Species List. Two individuals, possibly a breeding pair, were detected foraging over the Pacific Highlands Ranch site. It is not a MSCP-covered species.

California horned lark (*Eremophila alpestris actia*). The California horned lark is a federal species of concern, a MSCP-covered species, and a California species of special concern. Several individuals were detected along a dirt road within disturbed coastal sage scrub.

Coastal California Gnatcatcher. The site supports two areas of coastal sage scrub occupied by the coastal California gnatcatcher. Based on three years of study it appears as though these areas support at least four, and possibly five, gnatcatcher pairs. Two or three in the northwestern corner of the subarea and two on the eastern boundary. Suitable habitat for California gnatcatchers occurs along the slopes immediately adjacent to Gonzales Canyon in the western part of the site; however, no gnatcatchers have been discovered in this area. The remaining coastal sage scrub along the northern boundary of the site is not considered to be suitable for California gnatcatchers because of the limited amount and its bordering agriculture, residences, and dense chaparral. South of Black Mountain Road the highest potential for California gnatcatchers appears to be on the south-facing slopes of the ridgeline between McGonigle Canyon and Deer Canyon. However, no California gnatcatchers were found in this area during NRC's or SEB's survey. It is a MSCP-covered species.

Bell's sage sparrow. Bell's sage sparrow is a federal species of concern and can occur within both chaparral and coastal sage scrub habitats. In May of 1997, NRC located three individuals of this species in the southern portion of the Pacific Highlands Ranch site. It is not a MSCP-covered species.

San Diego black-tailed jackrabbit (*Lepus californicus bennettii*). The San Diego black-tailed jackrabbit is a federal species of concern and a California species of special concern. NRC observed three individuals within the coastal sage scrub habitats. It is not a MSCP-covered species.

Sensitive Wildlife Species—Not Detected On-Site

There are numerous sensitive wildlife species which are known to occur within the vicinity of the study area or for which potentially suitable habitat occurs within the project site boundaries. A list of these sensitive wildlife species potentially occurring on the Pacific Highlands Ranch site, but not detected on-site is provided in Table 4C-2. The potential for the federally listed endangered quino checkerspot is low because of the disturbed nature of the habitat. Surveys for the quino checkerspot butterfly consistent with the USFWS protocol were conducted by Natural Resource Associates throughout the entire "fly period" as specified in the field protocol. Results were negative and a report documenting the survey results is attached to the Biological Resources Report (Appendix C1).~~are currently being conducted during the public review period for this EIR.~~

d) Multiple Species Conservation Program (MSCP)

The MSCP is designed to identify lands that would conserve habitat for federal and state endangered, threatened, or sensitive species, including the federally listed threatened California gnatcatcher. The MSCP has been determined to be the equivalent of a Natural Community Conservation Plan for the area. The MSCP is a plan and process for the local issuance of permits under the federal and state Endangered Species Acts for impacts to threatened and endangered species.

In August 1996, the Draft MSCP Plan and related resource documents were released for public review. A final joint federal environmental impact statement and state EIR was released in January 1997 on the MSCP Plan and the MSCP was adopted by the City of San Diego in March 1997. The MSCP includes the compilation of information related to vegetation, land use, and generalized land ownership mapping and the preparation of biological standards and guidelines, a habitat evaluation model, and an analysis of the acreage necessary for a viable preserve system. The MSCP Plan also includes an implementation strategy, preserve design, and management guidelines. When adopted by local jurisdictions and approved by the U.S. Fish and Wildlife Service and CDFG, a final MSCP plan and report will be prepared.

Using the MSCP Plan as a framework plan, subarea plans may be prepared by local general-purpose agencies. The City of San Diego has prepared a subarea preserve plan to guide implementation of the MSCP Plan within its corporate boundaries. The San Diego subarea plan was adopted March 18, 1997. The project site is within the northern subarea of the City's subarea plan as part of the Future Urbanizing area preserve area. Within the northern subarea, the City proposes to "preserve two-thirds of the Los Peñasquitos Lagoon/Canyon/Del Mar Mesa core area within its jurisdiction" (City of San Diego 1996). To do so, "[p]reserve areas would be acquired or a conservation easement applied, as necessary, to assure wildlife movement and habitat restoration/protection." The

subarea plan contains a list of specific guidelines for the proposed North City FUA subarea; and four of these directly apply to the proposed project area.

- C 12 Incorporate bridges to facilitate wildlife crossings (Gonzales and McGonigle Canyon areas).
- C 14 Provide fences or barriers along the edges of the shallow north/south-trending canyon that connects Carmel Valley to Gonzales Canyon to direct public access to appropriate locations.
- C 17 If this area develops or redevelops, the Multi-Habitat Planning Area (MHPA) boundary should be accommodated with the majority of the floodplain to be placed in open space and restored where possible to natural habitats.
- C 19 In the event that the MHPA configuration is not implemented pursuant to the "Pardee Settlement Agreement," then the MHPA configuration shall be per the NCFUA Framework Plan. Provide an undercrossing of San Dieguito Road for wildlife movement from Gonzales Canyon of the San Dieguito River.

The MSCP Plan identifies lands for proposed open space and habitat preservation within a MHPA. The final MSCP preserve will be located within the MHPA. The MHPA includes core areas, linkages, and sensitive species populations deemed necessary to the success of the MSCP. Under the MSCP, 85 species are considered sufficiently protected to be considered "covered" by federal and state agencies with regards to long-term conservation of the species. The MSCP EIR addresses biologic impacts, both direct and indirect, to habitats, covered species, non-covered species, and wildlife movement. In all cases, impacts were regarded as insignificant or significant and mitigated by implementation of the MSCP.

The MSCP defines core areas as those "supporting a high concentration of sensitive biological resources which, if lost or fragmented, could not be replaced or mitigated elsewhere" (City of San Diego 1996). Linkages are essential connections between biological core areas for wildlife movement.

On July 14, 1997, the City of San Diego signed an Implementing Agreement with the U.S. Fish and Wildlife Service. The Implementing Agreement is the contract between the City and the wildlife agencies, which outlines the obligations and commitments made for the successful completion of the MSCP. The agreement has been signed by all parties and is effective July 17, 1997.

The Implementing Agreement now allows the City of San Diego to issue Incidental Take Authorizations (ITAs) under the MSCP. The ITAs replace the Interim Habitat Loss 4(d)

Permit that was established in August, 1994, for permitting of "take" of the California gnatcatcher and its associated habitat, coastal sage scrub.

Biology Issues

1. Would the proposed project, including compliance with the City's Brush Management Program, result in impacts to important habitat or to sensitive plant or animal species?
2. Would implementation of the Pacific Highlands Ranch Plan result in interference with the movement of any resident or migratory wildlife species?
3. Would the project affect the long-term conservation of biological resources?

1) Issue

Would the proposed project, including compliance with the City's Brush Management Program, result in impacts to important habitat or to sensitive plant or animal species?

Impacts

a) Subarea Plan 1

Direct Impacts

Development of Subarea Plan 1, including compliance with the City's Brush Management Program, would result in the loss of natural vegetation, a reduction in wildlife habitat values, and impacts to several sensitive species populations. Construction of the proposed project would result in the development of approximately 1,159.2 acres. Implementation of the proposed project would result in the direct removal of several existing sensitive vegetation communities including the direct removal of 19 acres (17.621-3 percent) of southern maritime chaparral, 4.04 acres (4.67 percent) of scrub oak chaparral, 17.4 acres (13.4 percent) of coastal sage scrub, 0.1 acre (2.37 percent) of coyote bush scrub, 1 acre (3.92 percent) of riparian scrub, 10.7 acres (40.49-1 percent) of woodland, and 0.6 acre (40 percent) of native grasslands. Table 4C-4 lists these impacts by vegetation type and Table 4C-5 shows the impacts categorized by the MSCP Tier Designation for Plan 1.

As shown on Figures 4C-2 and 4C-3, 14 sensitive plants would be adversely affected by the project. They include California adolphia, Del Mar manzanita, San Diego sagewort, Brewer's calandrinia, White coast ceanothus, prostrate spineflower, summer holly,

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TABLE 4C-4
IMPACTS TO VEGETATION COMMUNITIES
ON-SITE

Vegetation Community	Existing Acres	Subarea Plan 1 Impacts	Subarea Plan 2 Impacts
Chaparral			
Chamise	46.0	6.4	6.6
Southern maritime	108.0	19.0	18.7
Southern mixed	234.1	29.2	29.8
Scrub oak chaparral	87.1	4.0	3.3
Coastal Sage Scrub			
Lemonadeberry	17.1	1.5	1.5
Black sage	63.2	7.6	7.5
California sagebrush	15.0	4.5	4.6
California Adolphia	12.2	0.2	0.2
Disturbed	8.0	1.1	1.1
Mixed-annual grassland	8.3	0.8	0.6
Mixed	6.1	1.7	1.7
Other Scrub Vegetation			
Coyote brush scrub	4.3	0.1	0.0
Riparian Scrub			
Southern willow scrub	18.4	0.8	1.1
Mule fat scrub	7.2	0.2	0.2
Coastal and valley freshwater marsh	3.0	0.0	0.0
Woodland			
Southern sycamore riparian	3.2	0.0	0.0
Eucalyptus woodlands	19.1	10.7	10.8
Pond	4.2	0.0	0.0
Grasslands			
Annual	6.0	0.0	0.0
Native	1.5	0.6	0.6
Other Vegetation			
Ruderal	123.9	58.5	58.9
Disked/agriculture	1326.3	895.0	948.7
Graded	3.6	1.0	3.5
Developed	108.3	72.8	66.1
TOTAL	2233.5	1115.7	1165.5

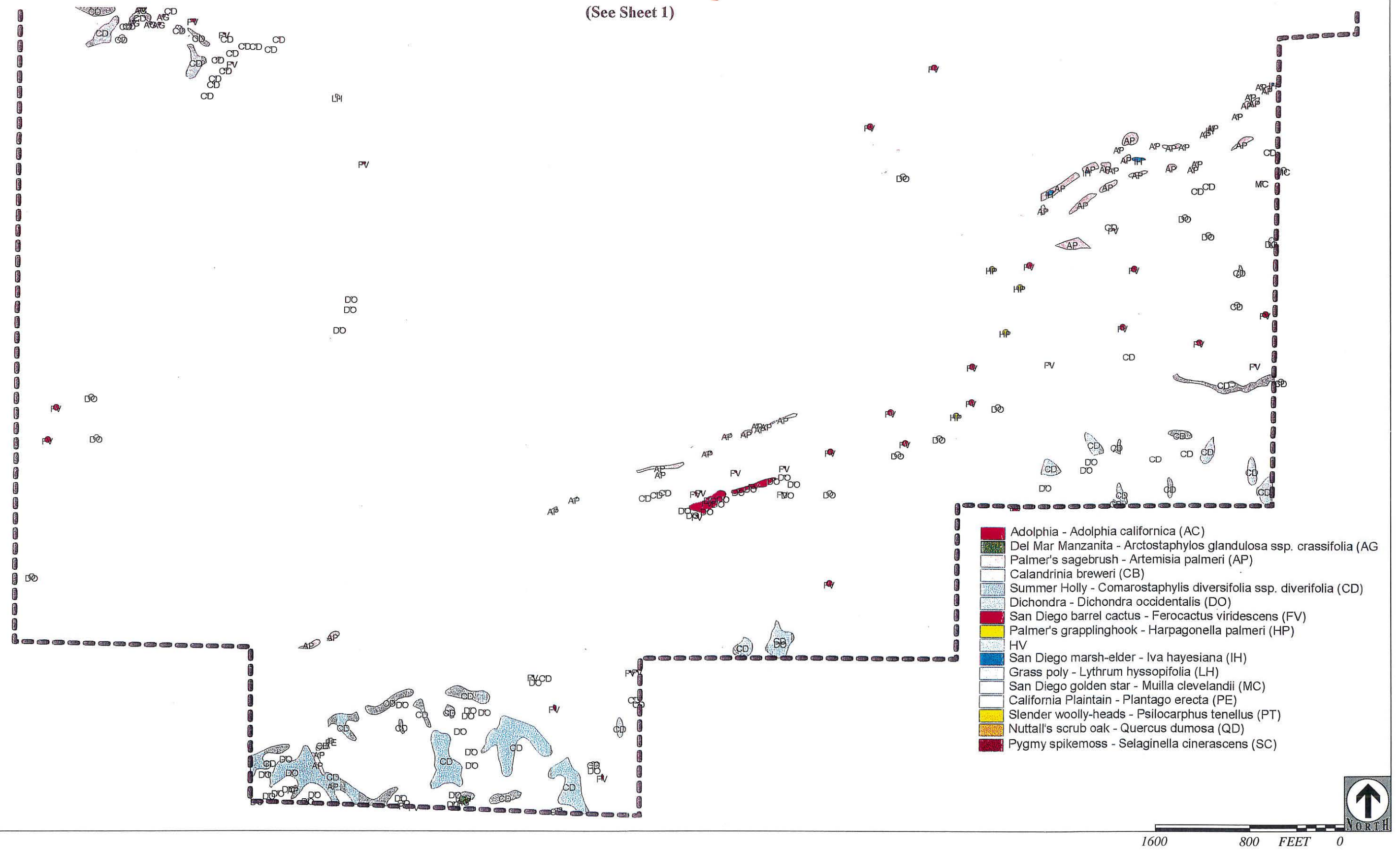
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TABLE 4C-5
TIER DESIGNATION IMPACTS AND MITIGATION REQUIREMENTS-PLAN 1
PARDEE

Tier Designation	MSCP Habitat Type	Development Impacts		Required MSCP Mitigation Ratios				Required Mitigation	Remaining Acreage	
		In MSCP	Out MSCP	Impact:In Mitigation:In	Impact:In Mitigation:Out	Impact:Out Mitigation:In	Impact:Out Mitigation:Out		In MSCP	Out MSCP
I	Southern maritime chaparral	13.2	1.4	2	3	1	2	27.8	41.5	4.3
I	Native grassland	0.6	0.0	2	3	1	2	1.2	-1.2	0.2
TIER I TOTAL		13.8	1.4					29.1	40.4	4.5
II	Lemonadeberry	1.4	0.0	1	2	1	1.5	1.4	12.0	0.0
II	Black sage	5.0	0.6	1	2	1	1.5	5.6	12.3	0.4
II	California sagebrush	2.3	0.0	1	2	1	1.5	2.3	0.7	0.5
II	California adolphia	0.1	0.0	1	2	1	1.5	0.1	8.7	0.0
II	Disturbed	0.7	0.4	1	2	1	1.5	1.1	5.5	-0.4
II	Mixed-annual grassland	0.8	0.0	1	2	1	1.5	0.8	6.7	0.0
II	Mixed	0.0	0.0	1	2	1	1.5	0.0	3.5	0.0
II	Coastal sage scrub	10.3	1.0	1	2	1	1.5	11.3	49.4	0.5
II	Coyote bush scrub	0.1	0.0	1	2	1	1.5	0.1	1.1	0.1
TIER II TOTAL		10.4	1.0					11.4	75.6	0.7
IIIA	Chamise chaparral	5.0	0.0	1	1.5	0.5	1	5.0	14.8	1.1
IIIA	Southern mixed chaparral	23.6	0.8	1	1.5	0.5	1	24.0	87.2	3.4
IIIA	Scrub oak chaparral	3.4	0.2	1	1.5	0.5	1	3.6	51.6	0.1
IIIA	Chaparral	32.1	1.0	1	1.5	0.5	1	32.6	153.5	4.6
TIER IIIA TOTAL		32.1	1.0					32.6	153.5	5.1
IIIB	Annual grassland	0.0	0.0	1	1.5	0.5	1	0.0	5.8	0.0
TIER IIIB TOTAL		0.0	0.0					0.0	5.8	0.0
SUBTOTAL								73.1	250.36	10.62
N/A	Southern sycamore riparian woodlands	0.0	0.0	2	2	2	2	0.0	2.2	0.0
N/A	Southern willow scrub	0.4	0.4	2	2	2	2	1.6	14.1	0.1
N/A	Mule fat scrub	0.0	0.0	2	2	2	2	0.0	5.7	0.0
N/A	Coastal & valley freshwater marsh	0.0	0.0	2	2	2	2	0.0	1.5	0.0
WETLAND TOTAL		0.4	0.4					1.6	23.5	0.1
IV	Eucalyptus woodlands	0.3	0.7	0	0	0	0	0.0	5.1	0.0
IV	Ruderal	4.3	2.9	0	0	0	0	0.0	17.1	1.8
IV	Disked/agricultural	88.3	712.1	0	0	0	0	0.0	349.4	38.3
IV	Graded	0.0	1.0	0	0	0	0	0.0	2.5	0.1
IV	Developed	0.2	0.0	0	0	0	0	0.0	9.1	1.1
OTHER VEGETATION TOTAL		93.1	716.7					0.0	383.1	41.3
TOTAL		149.8	720.4	0.0	0.0	0.0	0.0	74.7	657.0	52.0

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TABLE 4C-5
TIER DESIGNATION IMPACTS AND MITIGATION REQUIREMENTS-PLAN 1
NON-PARDEE

Tier Designation	MSCP Habitat Type	Development Impacts		Required MSCP Mitigation Ratios				Required Mitigation	Remaining Acreage	
		In MSCP	Out MSCP	Impact:In Mitigation:In	Impact:In Mitigation:Out	Impact:Out Mitigation:In	Impact:Out Mitigation:Out		In MSCP	Out MSCP
I	Southern maritime chaparral	0.0	4.4	2	3	1	2	8.8	15.0	-8.8
I	Native grassland	0.0	0.0	2	3	1	2	0.0	0.6	0.0
TIER I TOTAL		0.0	4.4					8.8	15.6	-8.8
II	Lemonadeberry	0.0	0.1	1	2	1	1.5	0.2	2.1	-0.1
II	Black sage	0.0	2.0	1	2	1	1.5	3.0	37.1	-3.0
II	California sagebrush	0.0	2.2	1	2	1	1.5	3.3	6.9	-3.3
II	California adolphia	0.0	0.1	1	2	1	1.5	0.2	3.3	-0.2
II	Disturbed	0.0	0.0	1	2	1	1.5	0.0	0.6	0.0
II	Mixed-annual grassland	0.0	0.0	1	2	1	1.5	0.0	0.0	0.0
II	Mixed	0.0	1.7	1	2	1	1.5	2.6	0.8	-2.5
II	Coastal sage scrub	0.0	6.0	1	2	1	1.5	9.2	50.7	-9.2
II	Coyote bush scrub	0.0	0.0	1	2	1	1.5	0.0	2.8	0.0
TIER II TOTAL		0.0	6.0					9.2	53.6	-9.2
IIIA	Chamise chaparral	0.0	1.4	1	1.5	0.5	1	1.4	18.0	-0.7
IIIA	Southern mixed chaparral	0.0	4.8	1	1.5	0.5	1	4.8	89.2	-4.1
IIIA	Scrub oak chaparral	0.0	0.4	1	1.5	0.5	1	0.4	26.5	0.9
IIIA	Chaparral	0.0	6.6	1	1.5	0.5	1	6.6	133.7	-3.9
TIER IIIA TOTAL		0.0	6.6					6.6	133.7	-3.9
IIIB	Annual grassland	0.0	0.0	1	1.5	0.5	1	0.0	0.0	0.0
TIER IIIB TOTAL		0.0	0.0					0.0	0.0	0.0
SUBTOTAL								24.5	202.8	-21.8
N/A	Southern willow scrub	0.0	0.0	2	2	2	2	0.0	0.2	1.6
N/A	Mule fat scrub	0.0	0.2	2	2	2	2	0.4	1.3	-0.4
N/A	Coastal & valley freshwater marsh	0.0	0.0	2	2	2	2	0.0	1.4	0.0
N/A	Southern sycamore riparian woodlands	0.0	0.0	2	2	2	2	0.0	1.0	0.0
N/A	Pond	0.0	0.0	2	2	2	2	0.0	4.2	0.0
WETLAND TOTAL		0.0	0.2					0.4	8.1	1.2
IV	Eucalyptus woodlands	0.0	9.7	0	0	0	0	0.0	3.2	0.1
IV	Ruderal	0.0	51.3	0	0	0	0	0.0	25.7	20.8
IV	Disked/agricultural	0.0	94.6	0	0	0	0	0.0	43.7	0.0
IV	Graded	0.0	0.0	0	0	0	0	0.0	0.0	0.0
IV	Developed	0.0	72.6	0	0	0	0	0.0	25.3	0.0
OTHER VEGETATION TOTAL		0.0	228.2					0.0	97.8	20.9
TOTAL			245.3					24.9	308.8	0.3

(See Sheet 1)



Source: Project Design Consultants, 1997

FIGURE 4C-3
Sensitive Plant Species
Southern Portion

western dichondra, coast barrel cactus, Palmer's grapplinghook, San Diego marsh-elder, San Diego golden star, Nuttall's scrub oak, and ashy (pygmy spikemoss). Impacts to the federally endangered Del Mar manzanita would also result from implementation of Plan 1. Eleven small groups of Del Mar manzanita supporting a total of 425 individuals would be removed.

As shown in Table 4C-2, several sensitive animal species would be adversely affected by the project. They include coastal California gnatcatcher, grasshopper sparrow, southern California rufous-crowned sparrow, Bell's sage sparrow, California horned lark, loggerhead shrike, Cooper's hawk, sharp-shinned hawk, turkey vulture, white-tailed kite, and orange-throated whiptail. Specifically, one pair of coastal California gnatcatchers found on the northwestern corner of the project site. Two orange-throated whiptail lizards were observed on-site in 1993, and it is anticipated that other individuals of this species would be affected by project implementation.

Implementation of the proposed project would directly affect habitat occupied by the above-listed bird species and affect foraging, perching, and, potentially, nesting habitats used by a variety of raptor species. No raptor nests were discovered on-site and project implementation is not anticipated to affect breeding of local raptors.

Third Party Beneficiary Status

Third Party Beneficiary Status shall be granted with adoption of the Pacific Highlands Ranch Subarea Plan provided the assurances in the MSCP Implementing Agreement are satisfied. The issuance of any permit by the City of San Diego does not authorize the applicant to violate any federal, state, or City laws, ordinances, regulations, or policies including, but not limited to, the federal Endangered Species Act of 1973 and any amendments thereto (16 U.S.C. Section 1531 et seq.).

In accordance with authorization granted to the City of San Diego from the USFWS pursuant to Section 10(a) of the Endangered Species Act and by the CDFG pursuant to Fish and Game Code section 2835 as part of the Multiple Species Conservation Program (MSCP), the City of San Diego through the issuance of this permit hereby confers upon permittee the status of Third-Party Beneficiary as provided for in Section 17 of the City of San Diego Implementing Agreement, executed on July 17, 1997 and on file in the Office of the City Clerk as Document No. RR-00-18394. Third-Party Beneficiary status is conferred upon permittee by the City:

1. To grant permittee the legal standing and legal right to utilize the take authorizations granted to the City pursuant to the MSCP within the context of those limitations imposed under this permit and the Implementing Agreement, and

2. To assure Permittee that no existing mitigation obligation imposed by the City of San Diego pursuant to this permit shall be altered in the future by the City of San Diego, USFWS, or CDFG, except in the limited circumstances described in Section 9.6 and 9.7 of the Implementing Agreement.

If mitigation lands are identified but not yet dedicated or preserved in perpetuity, maintenance and continued recognition of Third-Party Beneficiary status by the City is contingent upon permittee maintaining the biological values of any and all lands committed for mitigation pursuant to this permit and of full satisfaction by permittee of mitigation obligations required by this permit, as described in accordance with Section 17.1D of the Implementing Agreement. Third-party beneficiary status may be achieved through conveyance of land or recordation of an easement as described in the Pacific Highlands Ranch Subarea Plan.

Indirect Effects

Indirect impacts are those impacts that occur at a later time (e.g., after the development project is complete). Possible factors that could contribute to indirect effects on the animal species remaining in the open space areas include noise, light, presence of humans and horses, predation from domestic pets, and habitat isolation, including dispersal corridors.

Noise impacts to wildlife species may occur during construction, causing animals to avoid areas where noise levels are the highest. This would be a temporary impact which could be minimized for bird species by restricting brush clearing and grubbing to the nonbreeding season. Once construction is complete, ambient noise levels from the occupied housing development would not be at a level (i.e., greater than 60 A-weighted decibels) that would adversely affect wildlife within the open space areas.

Since construction would occur during the daylight hours, no lighting impacts to wildlife species are anticipated. Light emanating from the completed subarea would include outdoor lighting from homes, street lights, and lighting at the mixed use core commercial area, community park, and school sites. None of these sources would illuminate habitat in the center of open space areas to a level that would affect wildlife.

Outside of the development itself, human encroachment into the majority of the open space areas would be somewhat limited by steep slopes and dense vegetation cover. Typically, wildlife species occupying smaller (less than 50 acres), more isolated areas of the open space are affected by an increase in human activity in the habitat.

Potential impacts from domestic pets entering the open space area would be primarily from cats. Although small mammals, chiefly rodents, make up over 50 percent of the prey taken, up to 25 percent can comprise birds (Fitzgerald 1988). Domestic cats would

hunt less and spend less time hunting than feral cats, since they are receiving supplemental food (Turner and Meister 1988). Male feral cats are more wide-ranging and hunt more than female cats, domestic or feral (Liberg 1980). In general, the prey taken is dependent on the seasonal abundance of the prey, as cats are opportunistic hunters and tend to hunt prey that is readily available (i.e., rodents, rabbits). Cats also tend to hunt in open grassy areas. The low abundance of coastal California gnatcatchers and the preferred nesting in shrubby areas would appear to be an advantage, since cats would be more likely to encounter other bird species and hunt in more open areas; however, gnatcatchers nest low to the ground, increasing the risk of being discovered.

The majority of the cats in the newly developed area would be domestic and the adjacent open space areas are covered with thick brush. The magnitude of any indirect impacts to wildlife in open space areas is not quantifiable and will depend on the density of cats, their owner's habits, and how many go feral. However, it is anticipated that the greatest influence by domestic cats would be restricted to areas adjacent to homes (i.e., open fuel breaks) which typically form the center of their range.

Habitat loss from changes in fire frequency, installation of fuel breaks, removal by residents, and trampling by equestrian trails can affect both plant and animal species in fragmented open space areas (Alberts et al. 1993; Bolger, Alberts, and Soule 1991). All of these factors tend to open the habitat through disturbance, increasing the probability of colonization by ruderal weeds and ornamental plantings. Less habitat means fewer wildlife species that can be supported. Again, small habitat fragments are more susceptible to these effects than larger fragments.

Development of Subarea Plan 1 without mitigation measures could potentially impact San Dieguito or Los Peñasquitos Lagoons. Erosion and soil loss associated with grading without controls could result in silt entering the lagoon systems. Siltation in the lagoons resulting from soil loss on surrounding land is currently a principal factor causing reduction in wetland habitat values within the lagoons. Silt can bury small invertebrate animals that other animals depend upon for food, and can alter tidal influence in the lagoon.

b) Subarea Plan 2

Development of Subarea Plan 2, including compliance with the City's Brush Management Program, would result in a loss of natural vegetation, a reduction in wildlife habitat values, and impacts to several sensitive species populations. Specifically, construction of the proposed project would result in the development of approximately 1,258.2 acres. As listed in Table 4C-4, implementation of the proposed project would result in the direct removal of several existing sensitive vegetation communities including the direct removal of 18.7 acres (17.32+ percent) of southern maritime chaparral, 3.3+ acres (3.86 percent) of scrub oak chaparral, 17.2 acres (13.22-8 percent) of coastal sage scrub, 1.3 acres (5.14-2

percent) of riparian scrub, 10.8 acres (40.79-5 percent) of woodland, and 0.6 acre (40 percent) of native grasslands. Table 4C-6 shows the impacts categorized by the MSCP Tier Designation for Plan 2.

Indirect impacts would be similar to that of development of Subarea Plan 1.

c) Carmel Valley Neighborhood 10 Precise Plan

As noted in the Project Description (see Figures 3-5 and 3-6), another component of the proposed MHPA boundary adjustment includes encroachment into previously designated open space within the Neighborhood 10 Precise Plan. This additional MHPA encroachment would result in a loss of approximately 8.1 acres of Tier II and Tier III habitats (2.6 acres of coastal sage scrub and 4.5 acres on non-native grasslands). The land being impacted is not within a wildlife corridor and is within a central east-west trending canyon which has approved development on three sides.

Significance of Impacts

a) Subarea Plan 1

The direct, indirect, and cumulative impacts to sensitive biological resources described above are considered significant. The significant impacts include loss of MSCP Tier I (13.2 acres of southern maritime chaparral and 0.6 acre of native grasslands) and Tier II (10.34 acres of coastal sage scrub and 0.1 acre of coyote bush scrub) habitats, direct and cumulative loss of riparian scrub wetland habitats (approximately 0.4 acre), and impacts to the above-identified sensitive plant and animal species.

b) Subarea Plan 2

The direct, indirect, and cumulative impacts to sensitive biological resources described above are considered significant. The significant impacts include loss of MSCP Tier I (12.9 acres of southern maritime chaparral and 0.6 acre of native grasslands) and Tier II (10.10 acres of coastal sage scrub) habitats, direct and cumulative loss of riparian scrub wetland habitats (approximately 0.7 acre), and impacts to the above-identified sensitive plant and animal species.

c) Both Plans

Although both plans would meet the MSCP requirements, cumulative wetland impacts would remain significant.

d) Carmel Valley Neighborhood 10 Precise Plan

The impacts to coastal sage scrub and non-grasslands would be a significant impact.

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TABLE 4C-6
TIER DESIGNATION IMPACTS AND MITIGATION REQUIREMENTS-PLAN 2
PARDEE

Tier Designation	MSCP Habitat Type	Development Impacts		Required MSCP Mitigation Ratios				Required Mitigation	Remaining Acreage	
		In MSCP	Out MSCP	Impact:In Mitigation:In	Impact:In Mitigation:Out	Impact:Out Mitigation:In	Impact:Out Mitigation:Out		In MSCP	Out MSCP
I	Southern maritime chaparral	12.9	1.4	2	3	1	2	27.2	42.5	4.3
I	Native grassland	0.6	0.0	2	3	1	2	1.2	-1.2	0.2
TIER I TOTAL		13.5	1.4					28.4	41.3	4.4
II	Lemonadeberry	1.4	0.0	1	2	1	1.5	1.4	12.1	0.0
II	Black sage	4.9	0.6	1	2	1	1.5	5.5	12.5	0.6
II	California sagebrush	2.4	0.0	1	2	1	1.5	2.4	0.6	0.5
II	California adolphia	0.1	0.0	1	2	1	1.5	0.1	8.7	0.0
II	Disturbed	0.7	0.4	1	2	1	1.5	1.1	5.4	-0.2
II	Mixed-annual grassland	0.6	0.0	1	2	1	1.5	0.6	7.1	0.0
II	Mixed	0.0	0.0	1	2	1	1.5	0.0	3.5	0.0
II	Coastal sage scrub	10.1	1.0	1	2	1	1.5	11.1	50.0	1.0
II	Coyote bush scrub	0.0	0.0	1	2	1	1.5	0.0	1.4	0.1
TIER II TOTAL		10.1	1.0					11.1	51.3	1.0
IIIA	Chamise chaparral	5.2	0.0	1	1.5	0.5	1	5.2	14.5	1.1
IIIA	Southern mixed chaparral	24.2	0.8	1	1.5	0.5	1	24.6	86.0	3.8
IIIA	Scrub oak chaparral	2.7	0.3	1	1.5	0.5	1	2.8	53.1	0.1
IIIA	Chaparral	32.1	1.1	1	1.5	0.5	1	29.9	100.4	4.8
TIER IIIA TOTAL		32.1	1.1					29.9	100.4	4.8
IIIB	Annual grassland	0.0	0.0	1	1.5	0.5	1	0.0	5.8	0.0
TIER IIIB TOTAL		0.0	0.0					0.0	5.8	0.0
SUBTOTAL								69.5	199.2	10.3
N/A	Southern willow scrub	0.7	0.4	2	2	2	2	2.2	13.3	0.1
N/A	Mule fat scrub	0.0	0.0	2	2	2	2	0.0	5.7	0.0
N/A	Coastal & valley freshwater marsh	0.0	0.0	2	2	2	2	0.0	1.5	0.0
N/A	Southern sycamore riparian woodlands	0.0	0.0	2	2	2	2	0.0	2.2	0.0
WETLAND TOTAL		0.7	0.4					2.2	22.6	0.1
IV	Eucalyptus woodlands	0.4	0.7	0	0	0	0	0.0	5.0	0.0
IV	Ruderal	4.8	2.9	0	0	0	0	0.0	16.6	1.8
IV	Disked/agricultural	147.9	712.1	0	0	0	0	0.0	289.7	38.3
IV	Graded	2.5	1.0	0	0	0	0	0.0	0.0	0.1
IV	Developed	0.2	0.7	0	0	0	0	0.0	9.1	0.4
OTHER VEGETATION TOTAL		155.8	717.4					0.0	320.4	40.6
TOTAL		212.2	721.3					71.7	542.0	51.0

REVISED
TABLE 4C-6
TIER DESIGNATION IMPACTS AND MITIGATION REQUIREMENTS-PLAN 2
NON-PARDEE

Tier Designation	MSCP Habitat Type	Development Impacts		Required MSCP Mitigation Ratios				Required Mitigation	Remaining Acreage	
		In MSCP	Out MSCP	Impact:In Mitigation:In	Impact:In Mitigation:Out	Impact:Out Mitigation:In	Impact:Out Mitigation:Out		In MSCP	Out MSCP
I	Southern maritime chaparral	0.0	4.4	2	3	1	2	8.8	15.0	-8.8
I	Native grassland	0.0	0.0	2	3	1	2	0.0	0.6	0.0
TIER I TOTAL		0.0	4.4					8.8	15.6	-8.8
II	Lemonadeberry	0.0	0.1	1	2	1	1.5	0.2	2.1	-0.1
II	Black sage	0.0	2.0	1	2	1	1.5	3.0	37.1	-3.0
II	California sagebrush	0.0	2.2	1	2	1	1.5	3.3	6.9	-3.3
II	California adolphia	0.0	0.1	1	2	1	1.5	0.2	3.3	-0.2
II	Disturbed	0.0	0.0	1	2	1	1.5	0.0	0.6	0.0
II	Mixed-annual grassland	0.0	0.0	1	2	1	1.5	0.0	0.0	0.0
II	Mixed	0.0	1.7	1	2	1	1.5	2.6	0.8	-2.5
II	Coastal sage scrub	0.0	6.1	1	2	1	1.5	9.2	50.7	-9.2
II	Coyote bush scrub	0.0	0.0	1	2	1	1.5	0.0	2.	0.0
TIER II TOTAL		0.0	6.1					9.2	53.6	-9.2
IIIA	Chamise chaparral	0.0	1.4	1	1.5	0.5	1	1.4	18.0	-0.7
IIIA	Southern mixed chaparral	0.0	4.8	1	1.5	0.5	1	4.8	89.2	-4.1
IIIA	Scrub oak chaparral	0.0	0.4	1	1.5	0.5	1	0.4	26.5	0.9
IIIA	Chaparral	0.0	6.6	1	1.5	0.5	1	6.6	133.7	-3.9
TIER IIIA TOTAL		0.0	6.6					6.6	133.7	-3.9
IIIB	Annual grassland	0.0	0.0	1	1.5	0.5	1	0.0	0.0	0.0
TIER IIIB TOTAL		0.0	0.0					0.0	0.0	0.0
SUBTOTAL								24.5	202.8	-21.9
N/A	Southern willow scrub	0.0	0.0	2	2	2	2	0.0	0.2	1.6
N/A	Mule fat scrub	0.0	0.2	2	2	2	2	0.4	1.3	-0.4
N/A	Coastal & valley freshwater marsh	0.0	0.0	2	2	2	2	0.0	1.4	0.0
N/A	Southern sycamore riparian woodlands	0.0	0.0	2	2	2	2	0.0	1.0	0.0
N/A	Pond	0.0	0.0	2	2	2	2	0.0	4.2	0.0
WETLAND TOTAL		0.0	0.2					0.4	8.1	1.3
IV	Eucalyptus woodlands	0.0	9.7	0	0	0	0	0.0	3.2	0.1
IV	Ruderal	0.0	51.2	0	0	0	0	0.0	25.7	20.9
IV	Disked/agricultural	0.0	88.7	0	0	0	0	0.0	43.7	5.9
IV	Graded	0.0	0.0	0	0	0	0	0.0	0.0	0.0
IV	Developed	0.0	65.2	0	0	0	0	0.0	25.3	7.4
OTHER VEGETATION TOTAL		0.0	214.8					0.0	97.8	34.3
TOTAL		0.0	232.0					24.9	308.8	13.7

Mitigation, Monitoring, and Reporting

The significant direct and indirect impacts to upland biological resources would be mitigated to below a level of significance through conformance and implementation of the MSCP. The Pacific Highlands Ranch MSCP impacts and mitigation requirements are shown in Tables 4C-5 and 4C-6. Table 4C-5 shows the mitigation requirements for Plan 1 and Table 4C-6 shows the mitigation requirements for Plan 2. These tables separate the mitigation requirements for the Pardee ownership and the non-Pardee ownerships. The identified mitigation ratios are per the adopted MSCP based on the vegetation type (Tier Designation) being impacted. As these tables indicate, there is adequate acreage on-site to mitigate for Pardee's direct impacts within Pacific Highlands Ranch. There is also adequate acreage within Subarea III to mitigate for the 8.1 acres of impacts into Tier II and Tier III habitats previously designated as open space within Carmel Valley Neighborhood 10 Precise Plan. Approximately 16.2 acres of Tier II and III habitats would be required to mitigate impacts within Neighborhood 10. Other mitigation requirements identified to deal with direct and indirect impacts would be implemented at the time future tentative maps are processed and would include the following:

1. Staking and monitoring of grading activities shall be supervised by a qualified biologist to ensure no unanticipated impacts to sensitive habitats or species occur within the areas shown for permanent open space. This requirement should be noted on the grading plans prior to the issuance of a grading permit.
2. Brush management for Zone 2 shall be implemented as required by the City and shall be the responsibility of the adjacent landowner.
3. Lighting at perimeter lots adjacent to the open space shall be selectively placed, shielded, and directed away from that habitat.
4. Any fencing along property boundaries facing the open space corridors shall be designed and constructed of materials that are compatible with the open space corridors. Fencing shall be installed by the developer prior to the occupancy of the units in order to ensure uniformity. Locations where fencing are required are described in the Subarea Plan.
5. Restrictions for noise impacts on grading of lands adjacent to the MHPA consistent with the MSCP Subarea Plan should be implemented during the gnatcatcher breeding season. Grading inside the MHPA preserve or within 100 feet of the MHPA is prohibited during gnatcatcher breeding season. Grading can occur on land that was previously cleared.

Wetland impacts under both Plan 1 and Plan 2 would be mitigated through the creation/restoration within the Pacific Highland Ranch project site. Portions of the drainage bottoms with Deer Canyon and McGonigle Canyon have been disturbed by agricultural operations and can be utilized to accomplish wetland mitigation requirements on-site. Wetland restoration, at a ratio consistent with the MSCP, is a component in the conceptual revegetation plan prepared in conjunction with the mitigation land bank (see discussion below).

Other mitigation measures provided as extraordinary benefit to the City, negotiated as part of a contemplated development agreement for Subarea III would be the dedication of lands within Subarea V and the Carmel Valley community planning area. At Carmel Valley Neighborhood 8A (Parcels A and B), approximately 75 acres of Tier I habitat would be added to the MHPA. The addition of these lands to the MHPA would greatly increase the size of the habitat block planned for this particular geographic area, improving the overall preserve design and configuration, and providing greater assurances that scarce vegetation types (i.e., southern maritime chaparral) would be maintained over the long term. Additionally, future development potential at the Deer Canyon parcel within Subarea V would be avoided. Finally, Pardee Homes has agreed to other provisions which would further enhance the MHPA function. These measures consist of the following:

1. No brush management activities would be performed within the preserve along the edges of several of the proposed encroachment areas as described in the Subarea Plan. Zone 2 brush management would be allowed in other areas of the MHPA.
2. All manufactured slopes along the edge of the MHPA would be included within the MHPA and would be revegetated in accordance with a Master Revegetation Plan.
3. Impacts to wetlands would be minimized, and mitigation would be per City Ordinance and the U.S. Army Corps of Engineers 404 Permit requirements.
4. Approximately 100 acres of disturbed land within the MHPA for Pacific Highlands Ranch would be restored per a Master Revegetation Plan with appropriate upland and wetland habitats and a mitigation bank established. Much of this revegetation area consists of a manufactured wildlife corridor that would connect and provide for wildlife movement between Gonzales Canyon and McGonigle Canyon.
5. Conveyance of acreage within Carmel Valley Neighborhood 8A and Subarea V (Deer Canyon).

Prior to the issuance of grading permits in conjunction with future tentative map approvals, Development Services shall review the grading and landscape plans for consistency with the mitigation measures for impacts to biological resources (grading and

brush management). The above measures would be conditions of future development permits and landscape plans. After completion of grading and prior to the issuance of building permits, a site inspection by City staff would be required to ensure compliance with the brush management mitigation program.

Mitigation Land Banks

In order to effectuate the boundary adjustments to the MHPA, a mitigation bank would be established over approximately 100 acres of land within the Pardee ownership in Pacific Highlands Ranch. The bank will consist of disturbed land that will be revegetated in accordance with the master revegetation plan. Restored habitats will consist of appropriate wetland and upland habitats. It is anticipated that much of the upland habitat would consist of Tier II and Tier III habitats. The City will direct project applicants needing mitigation in the North City area to purchase credits in this bank, and will accept land from this bank into the MHPA upon purchase of credits by a third party. The bank will be processed and approved expeditiously by the City in a manner that will enable establishment costs to be kept to a minimum.

For areas to be restored, a conceptual revegetation summary which outlines the general criteria and maintenance requirements to be included in a more detailed master revegetation plan for Pacific Highlands Ranch is included as Appendix C2 to this EIR. Restored lands included in the mitigation bank would be maintained as required in the master revegetation plan until credits are sold and the land conveyed to the City for MHPA purposes. Upon conveyance, the City would assume responsibility for management and maintenance.

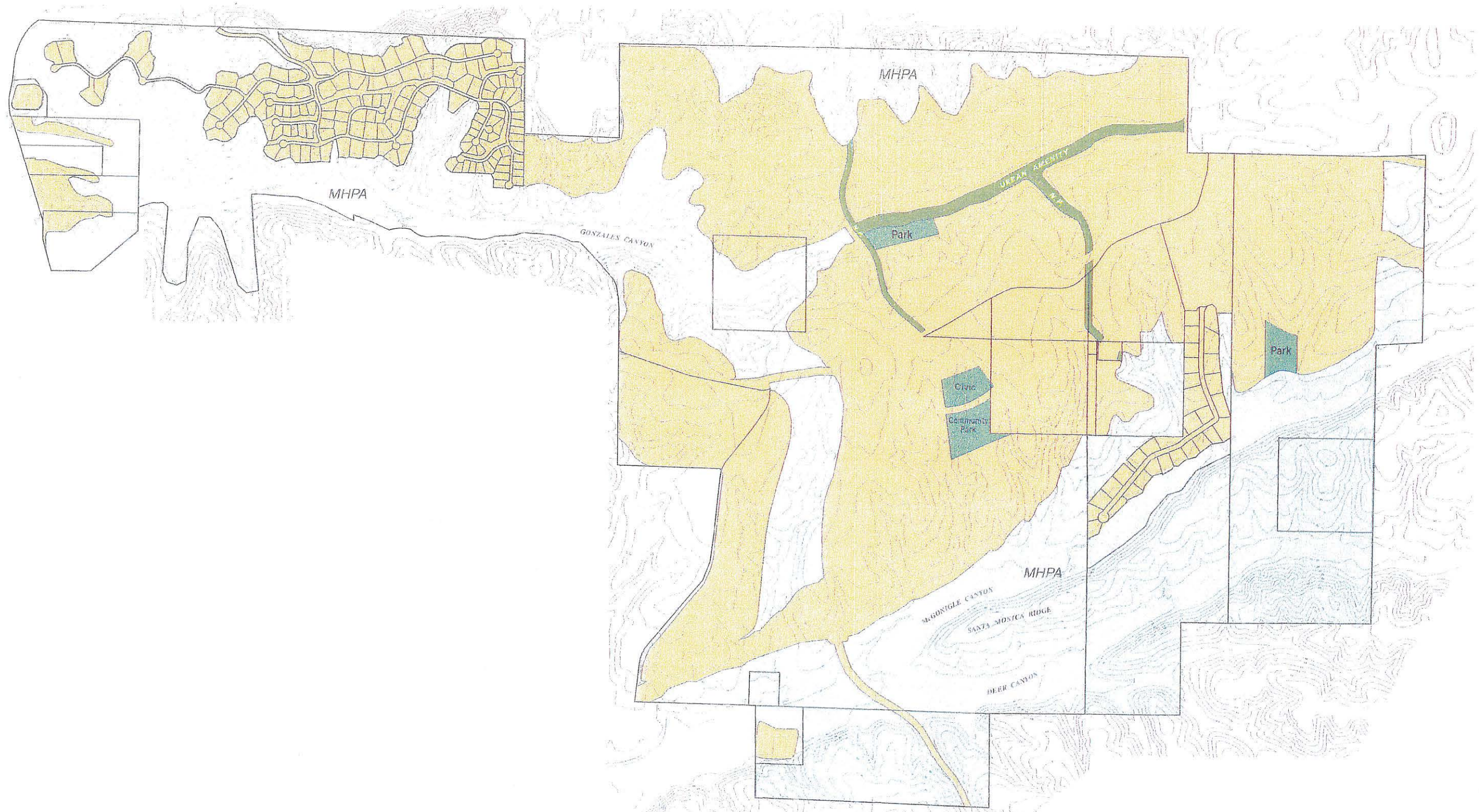
A mitigation bank covering approximately ~~2420~~ acres within Parcel A of Carmel Valley Neighborhood 8A would also be established as a component of the MHPA boundary adjustment process.

2) Issue

Would implementation of the Pacific Highlands Ranch Plan result in interference with the movement of any resident or migratory wildlife species?

Impacts

The major regional movement corridors within the NCFUA were identified during the MSCP planning process and were incorporated into the MHPA design for both Plans 1 and Plan 2 (Figures 4C-4 and 4C-5). Specifically, the MHPA under both plans incorporates the two major wildlife corridors envisioned for the project site in the MSCP Subarea Plan (i.e., McGonigle Canyon corridor and north-south linkage corridor). The



Map Source: Latitude 33 Planing and Engineering 1998

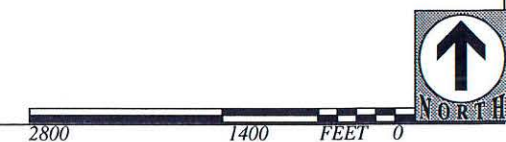
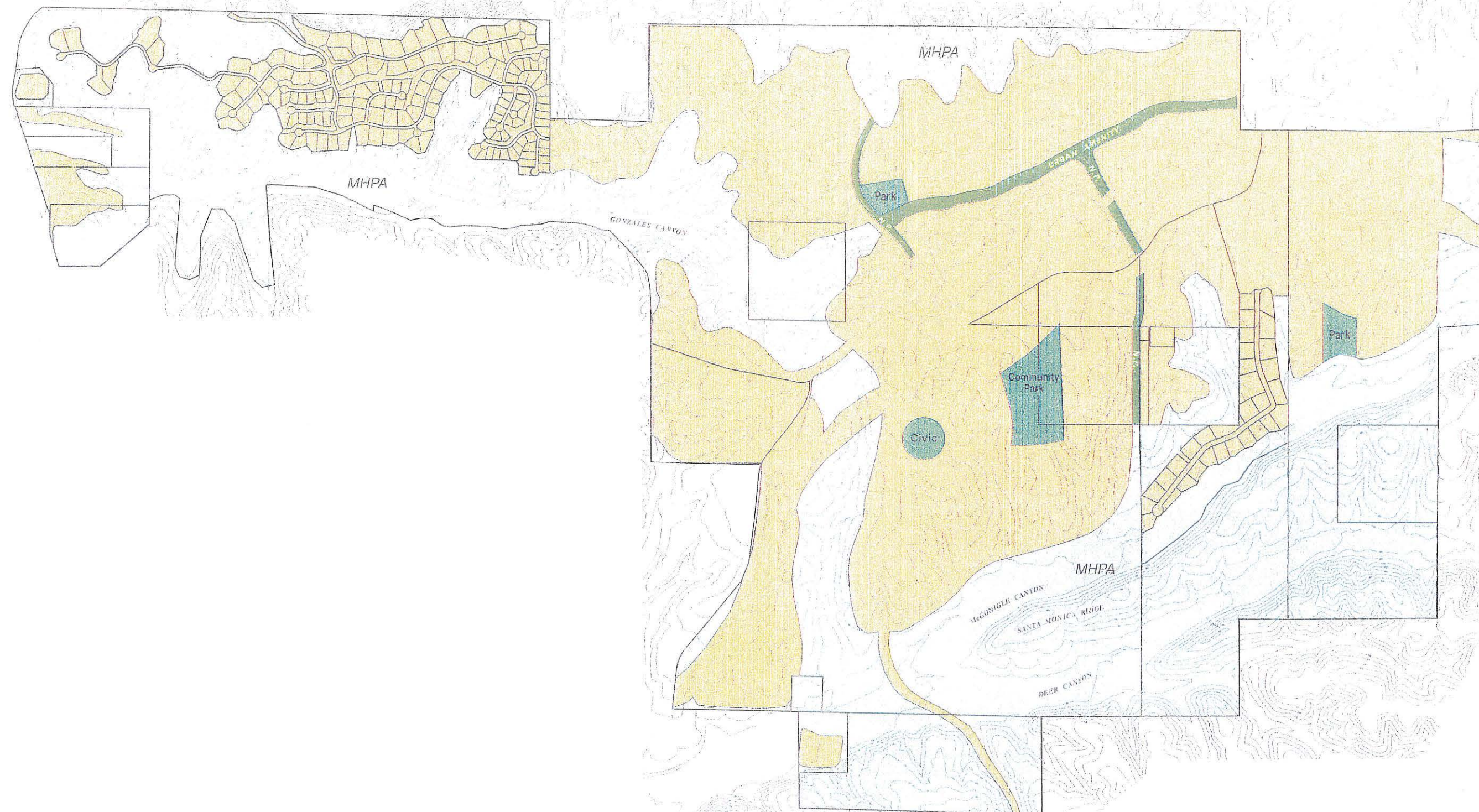


FIGURE 4C-4

**MHPA Design Subarea
Plan 1**



Map Source: Latitude 33 Planing and Engineering 1998



FIGURE 4C-5

**MHPA Design Subarea
Plan 2**

corridor widths (1,000 feet on average) and bridges/undercrossing associated with roadways crossing the corridors have also been accommodated in both plans.

Significance of Impacts

Because both Subarea Plans 1 and 2 accommodate the wildlife corridors identified in the MSCP (i.e., McGonigle Canyon, Gonzales Canyon, and the north-south linkage between the two), the impacts on wildlife movement from implementation of the Pacific Highlands Ranch Plan would not be significant.

Mitigation Monitoring and Reporting

No mitigation would be required other than the City's management and monitoring responsibilities as described in the MSCP.

3) Issue

Would the project affect the long-term conservation of biological resources?

Impacts

The MHPA in Pacific Highlands Ranch is largely comprised of regional linkages leading to off-site biological core areas within existing reserves and parks. Pacific Highlands Ranch includes portions of major linkages or corridors which lie in canyons or drainages (e.g., La Zanja Canyon, McGonigle Canyon, and Gonzales Canyon), the majority of which require restoration to enhance their long-term habitat value. Specifically, the City of San Diego MSCP Subarea Plan with respect to the NCFUA states the following: "Subareas III and IV contain only extended regional corridors, linking to the north west and south." The actual acreage of sensitive vegetation types and the numbers of "covered" plant and animal species within Pacific Highlands Ranch is minimal. Narrow endemic species were not observed within the subarea.

Subarea Plans 1 and 2. The projects' consistency with the MSCP Subarea Plan policies and guidelines are addressed in the Land Use section of the EIR, Chapter 4A. Both of the proposed subarea plans would contribute to the maintenance of biological diversity in the region through the establishment of an MHPA which is "functionally equivalent" with the system of wildlife corridors and habitat areas described in the MSCP. Both plans accommodate the realignment of SR-56 out of the MHPA, which reduces the impacts that would otherwise result from habitat fragmentation. Both plans incorporate an adjustment to the MHPA. The on-site open space system would preserve sensitive habitats (i.e., coastal sage scrub and southern mixed chaparral) and major wildlife corridors south of

SR-56 (i.e., Deer and McGonigle Canyons and Santa Monica Ridge) and provide the required northerly linkage/wildlife corridor via a north-south tributary canyon to Gonzales Canyon. This north-south corridor is currently disturbed grasslands and would function as part of the regional wildlife preserve system. Gonzales Canyon proceeds westerly through the Del Mar Highlands Estates PRD property and drains into the San Dieguito River valley. Undercrossings would be proposed beneath SR-56 and Del Mar Heights Road to facilitate wildlife movement. Additionally, the steep north-facing slopes above La Zanja Canyon and the San Dieguito River valley along the northern boundary of the subarea would also be a component of the natural open space system. Retention of these slopes would preserve the large contiguous block of southern maritime chaparral which exists on the site.

The MHPA boundary would also be adjusted at locations outside of Pacific Highlands Ranch. Specifically, the MHPA boundary within Carmel Valley Neighborhoods 8A and 10 would be modified while development potential on approximately 15 acres within the MHPA within Subarea V (Deer Canyon) would be removed. Within Neighborhood 10, the minor adjustment would result in removal of approximately 8.1 acres of Tier II and Tier III habitats (coastal sage scrub and grasslands). The land being removed from the MHPA is not within a wildlife corridor and is within a central east-west canyon which has approved development on three sides. This area is not part of a large contiguous block of undisturbed habitat. This modification would not affect the function of the preserve in Neighborhood 10.

At Carmel Valley Neighborhood 8A (Parcels A and B), approximately 75 acres of Tier I habitat would be added to the MHPA. The addition of these lands to the MHPA would greatly increase the size of the habitat block planned for this particular geographic area, improving the overall preserve design and configuration, and providing greater assurances that scarce vegetation types (i.e., southern maritime chaparral) would be maintained over the long term. The addition of a relatively large block of mostly Tier I habitat within Carmel Valley Neighborhood 8A would result in a MHPA that would be functionally equivalent ~~superior~~ to that shown in the MSCP Subarea Plan.

Overall, the reduction in the MHPA in both Pacific Highlands Ranch and Carmel Valley Neighborhood 10 is offset by increases to the MHPA in Carmel Valley Neighborhood 8A and the NCFUA Subarea V (Deer Canyon parcel). The proposed adjustment areas would remove largely disturbed land from the MHPA (Pacific Highlands Ranch and Carmel Valley Neighborhood 10), increase the preservation of rare Tier I resources (Carmel Valley Neighborhood 8A Parcels A and B), and remove the potential for development within the MHPA (15 acres within Subarea V Deer Canyon parcel and 75 acres within Neighborhood 8A).

Several plant and animal species covered under the City's Take Authorization occur within the subarea. Four MSCP-covered plant species occur within Pacific Highlands

Ranch: Del Mar manzanita (*Arctostaphylos glandulosa* ssp. *crassifolia*), coast barrel cactus (*Ferocactus viridescens*), San Diego golden star (*Muilla clevelandii*), and wart-stemmed ceonothus. These plants all occur within preserve areas that are to be deeded to the City of San Diego or the San Dieguito River Park Joint Powers Authority for long-term management. One reptile species, the orange-throated whiptail, was observed within the subarea. Management actions directed to this species include using drought-tolerant plantings, restoration of coastal sage scrub, and discouraging frequent irrigation within and around the perimeter of the preserve and minimizing edge effects. Two species of birds covered by the MSCP were observed: southern California rufous-crowned sparrow and the California gnatcatcher. Of concern for each is avoidance of active nests and maintenance and/or restoration/revegetation of coastal sage scrub habitat.

Significance of Impacts

Subarea Plans 1 and 2. Both subarea plans would provide for a regional open space system that is functionally equivalent with the MHPA proposed in the adopted MSCP.

No significant adverse effects to biological diversity would result through implementation of either Subarea Plan.

Mitigation, Monitoring, and Reporting

Subarea Plans 1 and 2. No mitigation would be required.

D. Hydrology/Water Quality

Existing Conditions

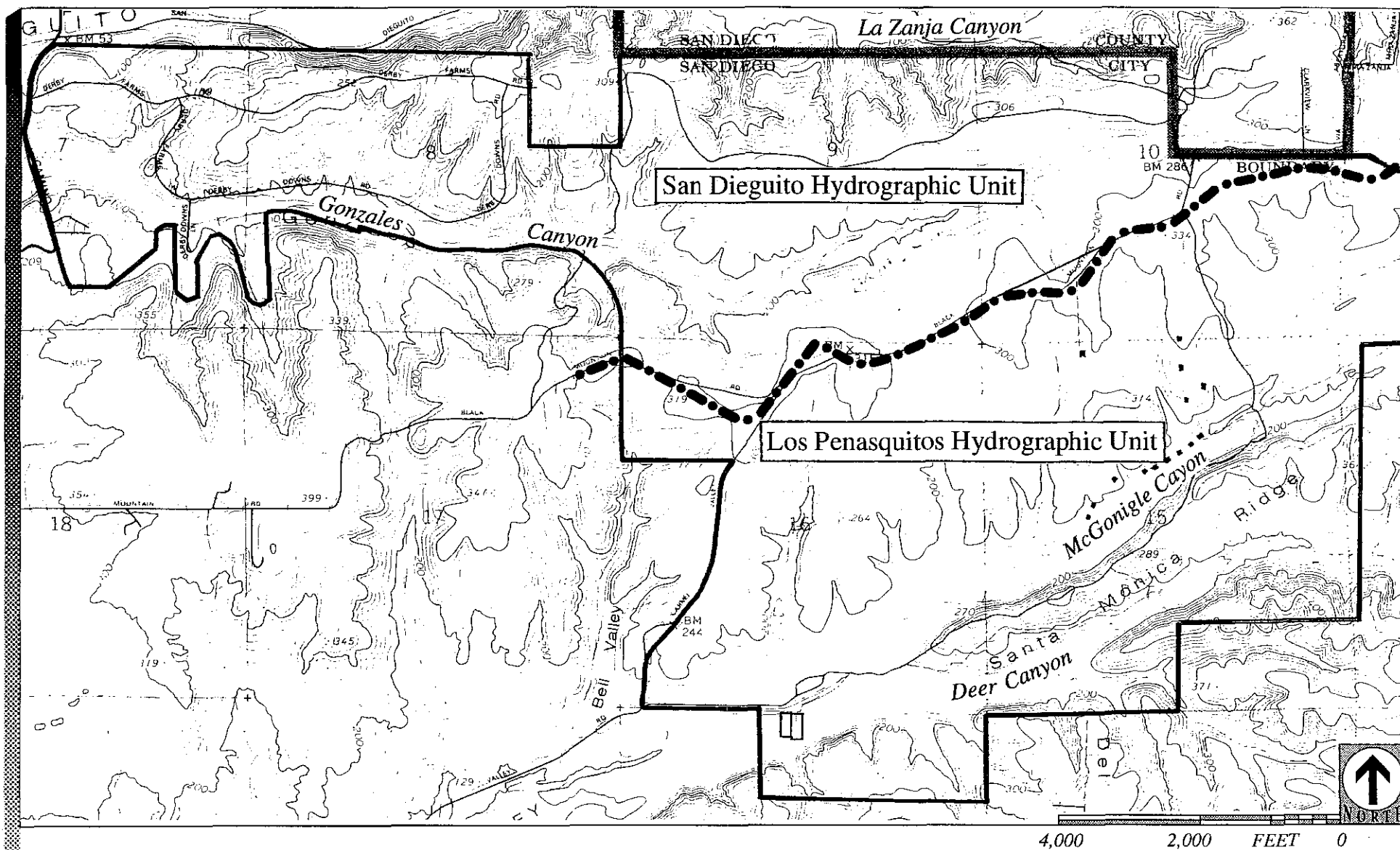
a) Surface Hydrology

Pacific Highlands Ranch is located within two adjacent hydrographic units (Figure 4D-1): that portion of the subarea approximately north of Black Mountain Road is in the San Dieguito Hydrographic Unit (HU) and that portion south of Black Mountain Road is in the Peñasquitos HU. Pacific Highlands Ranch can be further divided into four primary watersheds: the La Zanja and Gonzales Canyons in the San Dieguito HU, and McGonigle and Deer Canyons in the Peñasquitos HU. La Zanja and Gonzales Canyons drain the northern portion of Pacific Highlands Ranch and drain west into the San Dieguito River, which flows to the San Dieguito Lagoon and the Pacific Ocean. McGonigle and Deer Canyons drain the southern portion of the subarea and drain southwest into Carmel Valley, Los Peñasquitos Lagoon, and the Pacific Ocean.

The San Dieguito HU includes about 350 square miles between La Jolla on the coast and just east of Santa Ysabel. Drainage is provided by three major creeks and associated tributaries, including the San Dieguito River, Santa Ysabel Creek, and Santa Maria Creek. Average annual precipitation in the San Dieguito HU ranges from approximately 11 inches along the coast to 30 inches near Santa Ysabel (Regional Water Quality Control Board [RWQCB] 1994).

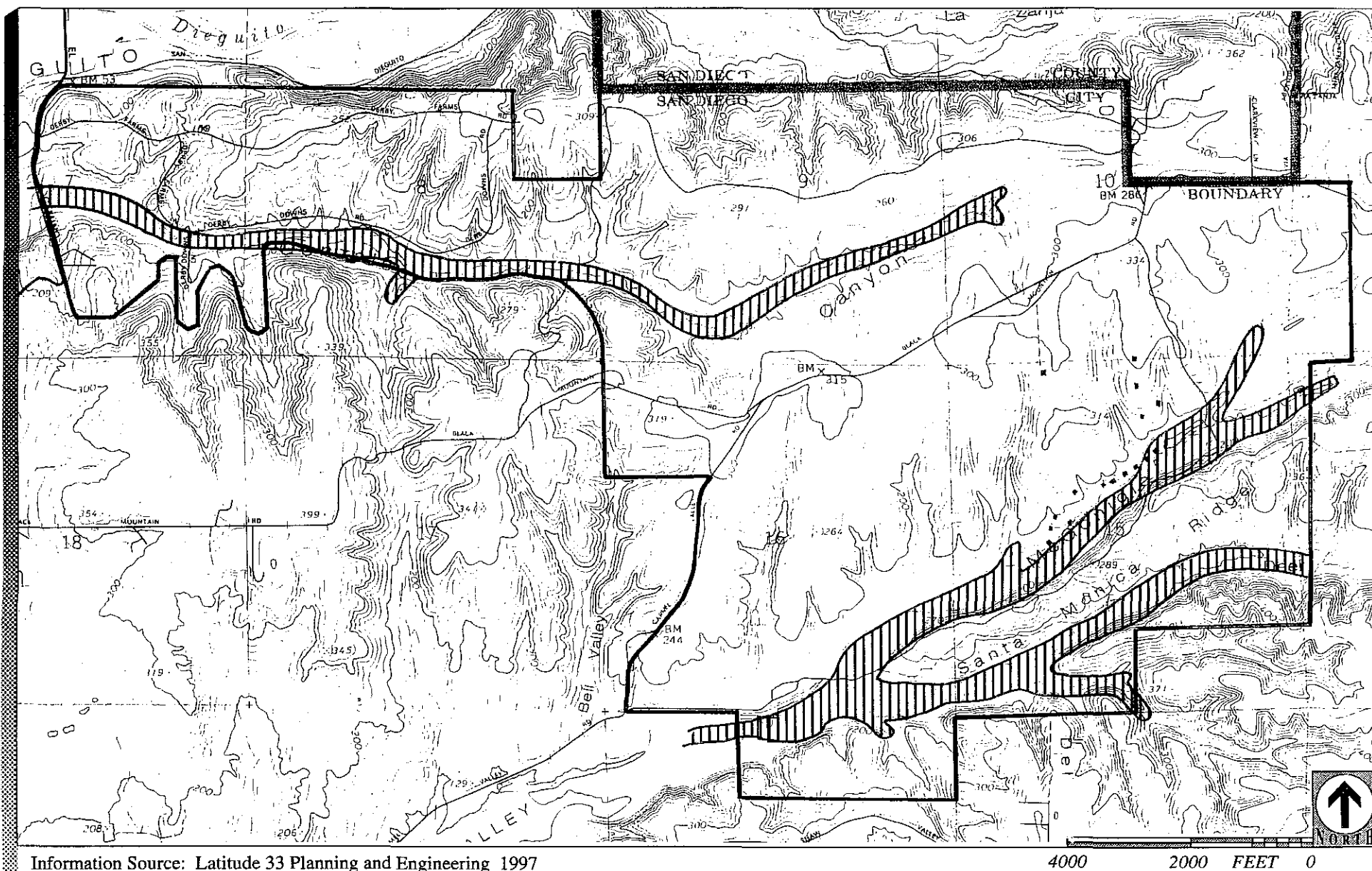
The Peñasquitos HU includes about 170 square miles of land between Poway on the east and La Jolla on the west. There are no major streams in this unit, although it is drained by numerous creeks and intermittent tributaries (RWQCB 1975:II-11-15). Two of these creeks are Los Peñasquitos Creek, located about one mile south of the project site, and Carmel Creek, within McGonigle Canyon in the southern portion of the project site. Los Peñasquitos Lagoon is located about three-quarters of a mile to the west.

As shown on Figure 4D-2, each of the four canyons mentioned above has been identified by the Federal Emergency Management Agency (FEMA) as comprising floodplains subject to a 100-year flood (a flood which has a one percent probability of occurring in any given year). Pacific Highlands Ranch is in Special Flood Hazard Zone A, which is categorized by FEMA as an unstudied zone. The City has records of severe flooding within the San Dieguito River drainage basin at the confluence of Gonzales Canyon and Lusardi Creek. These records show that a storm in 1916 caused severe flooding, with a runoff rate of 72,100 cubic feet per second (cfs). The McGonigle Creek and Deer Canyon floodplains, with a drainage basin of 15.3 square miles, do not have any City record of flooding.



----- Watershed boundary

FIGURE 4D-1
Subarea III Watersheds



Information Source: Latitude 33 Planning and Engineering 1997


 Flood plain limit

FIGURE 4D-2
Existing Floodplain

There are also several smaller, unnamed creeks and tributaries within and surrounding the subarea and included within the subarea's four watersheds. These smaller drainages are not considered a flood threat at this time.

Flooding Hazards

City Council Policy 600-14 establishes provisions for development within areas of special flood hazard. This policy prohibits development within areas of special flood hazard prior to completion of flood control works (detention basins) with a capacity to contain the 100-year peak flow, the application of appropriate floodplain regulatory zoning, or demonstration that a proposed development or structure complies with the policy's provisions for flood hazard reduction. The policy establishes requirements for development approvals in floodplains, special standards of construction, and standards for utilities and subdivisions.

The City requires that all new construction or substantial improvements within the floodplain fringe zone (which lies between the floodway, or stream channel, and the outer limit of the 100-year floodplain) shall be elevated one foot above the 100-year flood elevation, or otherwise protected (pursuant to City guidelines).

The City's Progress Guide and General Plan (1989) recommends placing an emphasis on the multipurpose use of floodplains. The City has adopted the "California Storm Water Best Management Practices Handbook" (State of California 1993), which is used during development of urban storm water management plans. These best management practices (BMPs) describe several methods of reducing adverse effects caused by urban storm water runoff. Several of the BMPs identified by the City and the State are included in this document as mitigation measures for potential hydrology/water quality impacts.

b) Groundwater

Groundwater basins in the northern portion of the subarea are associated primarily with surface drainage courses in Gonzales Canyon and the San Dieguito River. Groundwater in these areas occurs largely in relatively shallow alluvial deposits, with aquifers in most areas near the project site within 25 feet of the surface (Luke-Dudek 1988; U.S. Geological Survey [USGS] 1983). Well yields in these shallow aquifers are variable, with historical average rates of approximately 250 gallons per minute (gpm) and maximum rates of 1,800 gpm (USGS 1983; California Department of Water Resources [DWR] 1975). A number of deeper groundwater basins are also present in the project site vicinity, in association with geologic strata including Tertiary sediments and Jurassic/Cretaceous metavolcanics. Groundwater associated with these deposits may occur at depths of approximately 300 to over 1,000 feet below the surface. While local production data are not known to be available for these deeper aquifers, well yields are estimated to range between approximately 2 and 125 gpm (USGS 1983). Perched

groundwater may also occur seasonally in the project site and vicinity, in association with impermeable strata and high precipitation rates. Such aquifers are generally not laterally or vertically extensive and typically are not utilized as a water source.

c) Surface Water Quality

Surface water in the subarea and vicinity consists largely of intermittent storm runoff and irrigation drainage. These types of flow are subject to wide variations in water quality with factors such as runoff volume, velocities, and adjacent land use. Runoff within the project vicinity is derived from a number of agricultural, urban, and open space land uses. These types of areas can differ markedly in runoff quality, with undeveloped areas typically contributing lower quantities of contaminants such as bacteria, pesticides, nutrients, solids, and metals than urban or agricultural zones (Wigington, Randall, and Grizzard 1983). Existing and potential beneficial uses identified for surface waters in the project site and vicinity include agricultural, industrial, recreational, water reclamation, and wildlife habitat applications (RWQCB 1994).

San Dieguito River and Lagoon

Runoff from the northern portion of the project site flows primarily into Gonzales Canyon and drains west into the San Dieguito River, which eventually flows west to the San Dieguito Lagoon and the Pacific Ocean. Existing agricultural operations are contributing to soil erosion and sedimentation of natural drainages within and adjacent to the site. In addition, these operations utilize fertilizers and pesticides which are carried by storm water and irrigation runoff into on-site drainages and off-site into the San Dieguito River and Lagoon and Carmel Creek and Los Peñasquitos Lagoon. No reclaimed water is currently being used on-site. Although the current water quality impacts of on-site agriculture may be incremental and less than significant for the project site alone, cumulative urban and agricultural runoff may be significant.

Gonzales Canyon exhibits largely ephemeral runoff associated with storm events, although additional flow is associated with local irrigation runoff. On-site drainage facilities are limited to minor crossing structures (i.e., culverts) and impoundments (as described below under "Flooding Hazards"). Downstream drainage facilities include numerous crossing structures (bridges and culverts) in portions of Gonzales Canyon and the San Dieguito River. The design specifications for these downstream facilities are unknown, although it is likely that at least some of the older structures are not designed to accommodate current 100-year storm flows.

Over the past 10-15 years, development in the Carmel Valley community and other surrounding areas has resulted in sedimentation, urban runoff, and the associated water quality degradation within the San Dieguito River and Lagoon, Los Peñasquitos Lagoon,

and Carmel Valley (Los Peñasquitos Lagoon Foundation 1985; City of San Diego 1992a).

Los Peñasquitos Creek and Lagoon

Runoff from the southern portion of the project site flows primarily into McGonigle and Deer Canyons and drains west into Carmel Valley Creek, which eventually flows west to the Los Peñasquitos Lagoon and the Pacific Ocean. Los Peñasquitos Lagoon has been identified as a valuable and highly sensitive coastal resource (Leedshill-Herkenhoff 1985:2-1). The lagoon is comprised of a tidal channel, salt marsh, mud flats, and salt ponds totaling about 350 acres. These areas provide habitat to a variety of plants, animals, and aquatic life. The size of the lagoon is dependent upon the amount of fresh water draining into the lagoon and the presence of a sand deposit at the lagoon entrance which closes the lagoon most of the year. The sand deposit is caused by a combination of natural and artificial conditions resulting from natural ocean currents and the presence of Highway 101 and the Santa Fe railroad bridge. The entrance can be unblocked by either artificial means or runoff from winter storms with sufficient volume to remove the sand. When the lagoon is blocked, no tidal flushing occurs and the water in the lagoon is not able to assimilate nutrients and urban runoff from storms. This results in periodic algae blooms, accelerated aquatic growth, mosquito breeding, and unsightly conditions.

Regular monitoring of Los Peñasquitos Lagoon has been conducted since 1987 by the Pacific Estuarine Research Laboratory for the Los Peñasquitos Lagoon Foundation. Water quality monitoring has been conducted at three locations for water salinity, dissolved oxygen content, and water clarity. One location is where Carmel Creek flows into the lagoon, the second location is near the railroad trestle, and the third location is near the lagoon mouth. From September 1991 to September 1992, the lagoon mouth was open for 316 days (87 percent of the year), which is twice as long as it was open the previous year. The mouth was open longer presumably due to the "well executed dredging of the mouth during the past 18 months" (Los Peñasquitos Lagoon Foundation 1992:5). When the lagoon mouth is closed, water can stagnate. This can cause oxygen levels to drop, resulting in fish kills. In 1992, there were no fish kills and the lagoon was healthy. More invertebrate species were found in the lagoon in 1992 than in any other year since monitoring began (Los Peñasquitos Lagoon Foundation 1992:5).

Several facilities have been constructed in the lagoon area that act to control sediment, even though they were not built for that purpose; specifically, Interstate 5, Highway 101, the Santa Fe railroad, and three 10-foot-high by 12-foot-wide by 287-foot-long concrete box culverts. The box culverts are intended to drain Carmel Creek but are now filling with sediment and acting as a sediment trap. These facilities have been constructed without any coordinated effort to control sediment or protect the quality of Los Peñasquitos Lagoon. In addition, future development, both approved and proposed, could further affect the hydrologic, hydraulic, and water quality of Carmel Valley and

Los Peñasquitos Lagoon. Some of these areas will be removed or rendered unnecessary due to the Carmel Valley Restoration and Enhancement Program (CVREP) improvements.

The City's Coastal Development Permit ordinance (Section 105.0209) requires that all projects located within the watershed of Los Peñasquitos Lagoon be required to pay an enhancement fee to the Los Peñasquitos Lagoon Enhancement Fund. The fee is computed on the basis of site grading at a rate of \$0.005 per square foot for all areas graded, with an additional rate of \$0.03 per square foot for all impervious surfaces created by the development. The payment of the enhancement fees constitutes adherence to the law; and, as such, is not considered "mitigation."

Two areas of sediment deposition have been identified along Carmel Valley. The first area is adjacent to I-5, with about 28 acres upstream of I-5 and 18 acres downstream of I-5. A second sediment area, about 9.3 acres in size, is located at the confluence of Carmel Creek and the Shaw Valley drainage channel off-site to the north about 1,500 feet within Neighborhood 8. This sediment is trapped by Shaw Valley Road and the remains of a breached dam. All of these sediment-trapping structures are providing a certain level of protection to the lagoon; however, they were not designed for the purpose of sediment control in Carmel Valley and no maintenance for them is provided. Furthermore, the capacity of these structures to continue to trap sediment is limited and a threat of flood damage exists (Leedshill-Herkenhoff 1985).

It should also be noted that plans for the CVREP and enhanced riparian corridor and revegetation of the existing Carmel Creek floodway have been approved by the California Department of Transportation (Caltrans) and construction is under way. CVREP involves the grading and planting of a riparian channel to provide sediment control for the section of Carmel Creek from I-5 to Carmel Country Road. This project when completed will accommodate the 100-year flood flows as well as establish a riparian corridor. As part of the environmental studies for the CVREP project, three water quality samples from Carmel Creek between I-5 and Carmel Country Road were tested (City of San Diego 1990:115). The results of the chemical analyses indicate that lead, zinc, cadmium, and nitrate, as well as other substances, were well below the limits of both drinking water and hazardous waste standards. The measured grease and oil was less than one milligram per liter, which is also considered low (City of San Diego 1990:115).

One of the main project objectives of CVREP is to reduce sediment transport to Los Peñasquitos Lagoon. This will be accomplished by creating a heavily vegetated, natural-appearing channel with an approximate 140- to 200-foot-wide channel bottom, with a total vegetated width of 300 to 400 feet. The channel has been designed to convey 100-year flood flows for the drainage area, which includes the precise plan area. The principal water velocity and sediment control will be achieved by the riparian vegetation. The channel has been designed to convey a maximum peak flow rate of 9,800 cubic feet

per second at I-5. The existing sediment deposition area west of El Camino Real will be retained as an active sediment management area, with sediment removal as required.

In order to provide assurance of erosion and sediment control prior to the establishment of vegetation, a series of four drop structures will be constructed at the narrowest points in the channel, with a maximum height of seven feet. These structures would slow velocities and prevent channel erosion immediately upstream of each structure, prior to the establishment of vegetation. One desilting basin exists near the northeast corner of the precise plan area. It is located south and west of the existing southern segment of Carmel Country Road and is intended to be replaced by the CVREP facilities.

d) Groundwater Quality

The quality of the region's groundwater (use of which is considered minor or insignificant) is described by the City's Water Department as "poor." The poor groundwater quality is probably due to prior agricultural use and/or saltwater intrusion due to overdraft in the region. Shallow groundwater conditions are indicated by standing water in Carmel Valley. It is likely that a permanent shallow groundwater table exists within Gonzales, McGonigle, and Deer Canyons. It is also likely that during the rainy season, shallow perched groundwater conditions could develop within alluvial and colluvial deposits in many areas.

Groundwater that occurs in the coastal portion of the San Dieguito HU is generally sodium chloride in character, with total dissolved solids (TDS) levels typically varying from approximately 1,000 to 5,000 milligrams per liter (mg/l). Groundwater ratings for domestic use in this section of the San Dieguito HU are largely inferior, due to high TDS and sulfate content. Ratings for irrigation use in this unit are also generally inferior due to high electrical conductivity and a high chloride content (RWQCB 1994). Groundwater quality may vary locally, however, with conditions such as site-specific geology and land use. Two existing wells located in Gonzales Canyon just south and west of the subarea, for example, yielded TDS concentrations of 947 and 1,250 mg/l during a 1981-82 study (USGS 1983). Existing and potential beneficial uses identified for groundwater in the project site vicinity include municipal, agricultural, and industrial applications (RWQCB 1994). Local groundwater is currently being used for irrigation in association with on-site agricultural activities.

Groundwater quality in the Peñasquitos HU is generally marginal to inferior for domestic and irrigation purposes. In the coastal part of the Peñasquitos area, groundwater salinities range from 500 to 5,000 mg/l of TDS and usually exhibit a sodium chloride character. The prevailing sodium chloride character of the groundwater found in both the mesas and alluvium-filled valleys can be largely attributed to connate waters. Connate water is the water entrapped in the interstices of a sedimentary rock at the time the rock was deposited.

e) Water Supply

The City's Progress Guide and General Plan states as goals the increased use of local water resources and a decreased reliance on imported water. Innovative water supply techniques emphasizing local resources are encouraged, including reclamation and watershed management. Relevant recommendations include implementation of watershed management practices designed to increase quantity and quality of runoff collection, active participation in water reclamation, publicity regarding voluntary water conservation measures, and encouragement of local agencies to enforce conservation measures. Water quality objectives and criteria of the RWQCB and the State Water Resources Control Board apply to water provided by the City. Water transported through the Second San Diego Aqueduct and anticipated to serve Pacific Highlands Ranch is treated at Lake Skinner, in southern Riverside County, and is expected to meet all applicable standards for drinking water.

The City's Water Utilities Department maintains a list of conditions for new developments designed to ensure adequate water and sewer service to new developments. Measures include provision of a master water study and a master sewer study, installation of fire hydrants at appropriate locations, and design and installation of a reclaimed water distribution system for irrigation of common areas and/or open spaces.

f) Applicable Ordinances and Regulations

Construction of any project in the City of San Diego is subject to the requirements for erosion control in the City's Grading Ordinance and is also required to comply with the federal 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 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.

Runoff flowing across developed sites 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. For the management of storm water, municipalities in the San Diego region, including the City of San Diego, must comply with the RWQCB's NPDES Permit No. CA 0108758, which consists of wastewater discharge requirements for storm water and urban runoff. In compliance with

Permit No. CA 0108758, a Best Management Practices Program for Stormwater Pollution Control has been created. BMPs appropriate to the characteristics of a project may 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. Among BMPs employed where the increase in impervious surfaces substantially increases runoff rates and volumes are:

- Detention basins, effective for very large drainage areas. These are essentially ponds with controlled release rates to minimize downstream effects. Some pollutants can settle during storage and improve the quality of water released.
- Infiltration basins, designed to hold runoff and allow percolation into the ground. These basins need adequate storage volume and good permeability of the underlying soils.
- Infiltration trenches and dry wells, holes, or trenches filled with aggregate and then covered. Dry wells are typically used for runoff from roofs; infiltration trenches typically serve larger areas, such as streets and parking lots in commercial areas. Both are best suited for areas with permeable soils and a sufficiently low water table or bedrock.
- Porous pavement such as lattice pavers or porous asphalt. These may be used to replace large areas of paving that are not subject to heavy traffic.
- Vegetative controls, plant materials which intercept rainfall and filter pollutants and absorb nutrients.
- Grassed swales, shallow grass-covered channels used in place of a buried storm drain. This type of vegetative control is most applicable to residential areas.

BMPs can also include nonstructural methods, such as controlling litter and waste disposal practices.

Hydrology/Water Quality Issue

1. What modification to the natural drainage system would be required for implementation of the Pacific Highlands Ranch Plan? Would the project result in changes in the rate and amount of runoff?
2. Would the project result in alterations to the course or flow of floodwaters?
3. What effect would implementation of the project have on water quality in the San Dieguito River, Los Peñasquitos Creek, and Carmel Valley River Enhancement Project drainage basins?

1) Issue

What modification to the natural drainage system would be required for implementation of the Pacific Highlands Ranch Plan? Would the project result in changes in the rate and amount of runoff?

Impacts

Impacts to the natural drainage system as a result of development can take the form of increased rate of rainfall runoff, soil erosion, and sedimentation from steep, unprotected areas, runoff pollution, and drainage diversion. Runoff pollution impacts are discussed in detail below under Issue 2.

Subarea Plans 1 and 2. The development of natural areas often causes an increase in the amount of runoff as a direct result of creating impervious surfaces which prevent absorption of water into the ground. Impervious surfaces include paved streets, patios, driveways, and foundations for structures. It is estimated that with implementation of both plans, about 49 percent of the precise plan area would be developed (graded). An increased amount of runoff over the amount normally provided for in natural drainages and water bodies can cause flooding and water damage. Uncontrolled runoff on steep slopes and increased runoff velocity, especially on slopes with exposed soils or sparse vegetation, can cause erosion and increased sediment, which accumulates in streams and lagoons.

Gonzales, McGonigle, and Deer Canyons would be preserved as natural open space in the MSCP open space preserve, thereby minimizing impacts to the natural drainage system. The primary impact to existing drainage courses would be from major road crossings, which is unavoidable due to site topography. The road crossings would incorporate

bridges, culverts, and flow dissipaters to maintain appropriate volumes and prevent flooding.

Development of Pacific Highlands Ranch would cause some increases in discharge volumes into the natural drainages and valleys of the subarea, due primarily to an increase in acreage of buildings, roads, and other hardscape areas. Without protective measures, this hardscape could increase the volume or velocity of storm water runoff, thereby increasing the potential for erosion and flooding. Based on preliminary conceptual studies, postdevelopment runoff from Pacific Highlands Ranch during a 100-year storm event was estimated at 2,782cfs. Of this amount it is estimated that approximately 1,509 cfs will drain to Gonzales Canyon and the San Dieguito River, while 1,273 cfs will drain to Carmel Valley via Deer and McGonigle Canyons. This increase in on-site storm water runoff could result in increased storm water flows downstream from Pacific Highlands Ranch.

Figures 4D-3 and 4D-4 show possible locations for storm water detention basins to handle the anticipated increase in storm water runoff due to implementation of the Pacific Highlands Ranch Plans. Plan 1 and Plan 2 propose two new detention basins in the subarea; the possible locations for these basins are in the southern portion of the subarea near the western entrance of McGonigle Canyon, and in Gonzales Canyon in the northwest portion of the site. While the exact dimensions would depend on more specific tentative map designs, the capacities of the basins would accommodate a 10-year storm with a six-hour duration.

Significance of Impacts

Subarea Plans 1 and 2. Construction activities in Pacific Highlands Ranch could result in significant erosion, siltation, and water quality impacts. The increase in runoff volume and velocity due to the introduction of streets, roads, and other hardscape surfaces could result in significant adverse erosion, water quality, and flooding impacts to existing natural drainage courses and the Carmel Valley storm drain system. However, these impacts are mitigable to below a level of significance by incorporating the City's BMPs and the standard engineering practices listed below.

Mitigation, Monitoring, and Reporting

Subarea Plans 1 and 2. Incorporation of the following mitigation measures into project design would mitigate potential hydrology/water quality impacts to a level of less than significant. The exact locations and design of these measures will be determined in conjunction with future specific development proposals. As a condition of future tentative map approvals, the following mitigation measures shall be specified on the grading plan:

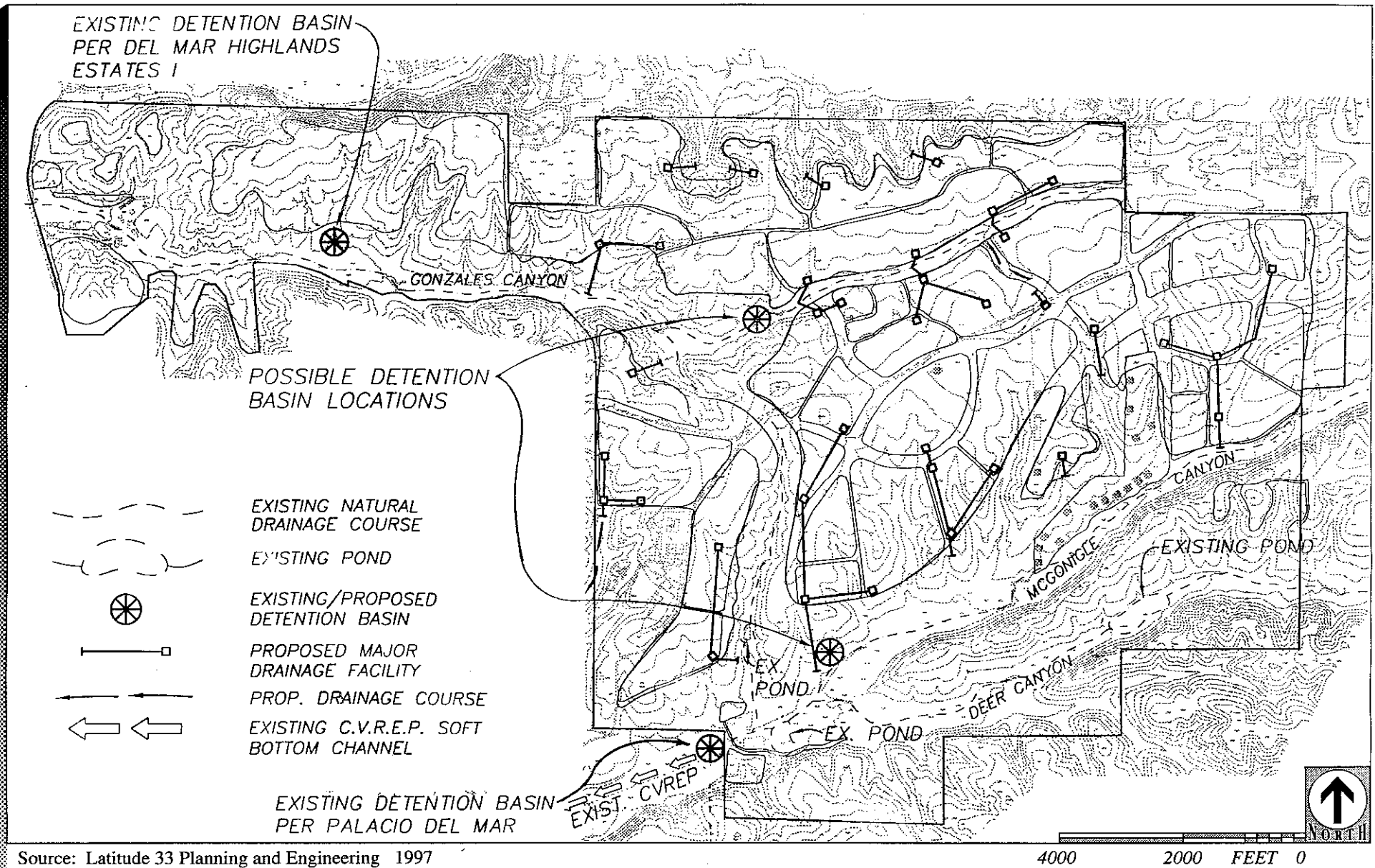
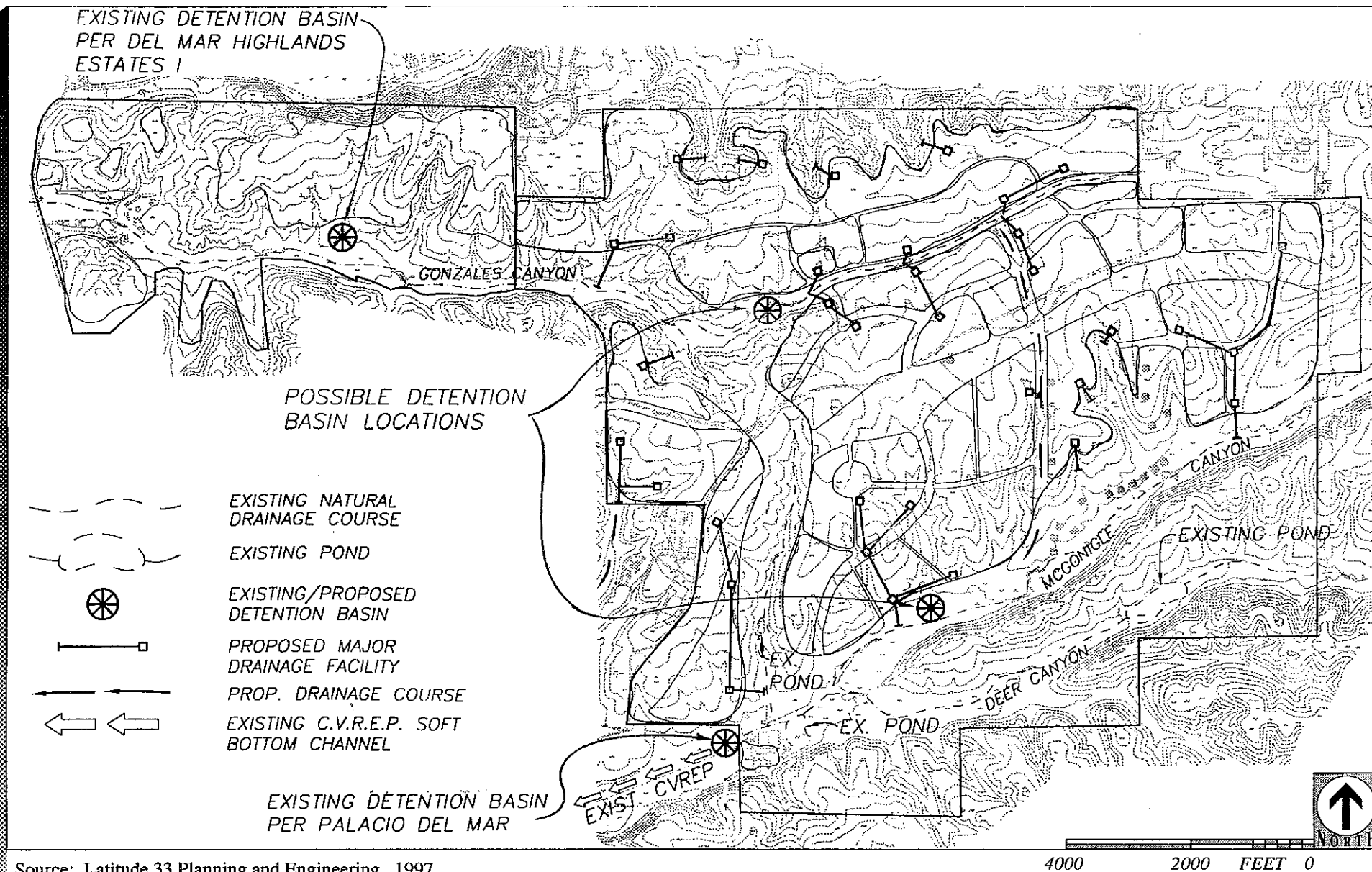


FIGURE 4D-3
Plan 1 - Major Storm Drain Infrastructure



Source: Latitude 33 Planning and Engineering 1997

FIGURE 4D-4
Plan 2 - Major Storm Drain Infrastructure

Short-term Construction Practices

1. As a condition of future VTMs and to be shown as a note on the grading permit, grading and other surface-disturbing activities either shall be planned to avoid the rainy season (i.e., November through March) to reduce potential erosion impacts or shall employ construction phase erosion control measures, including the short-term use of sandbags, matting, mulch, berms, hay bales, or similar devices along all graded areas to minimize sediment transport. The exact design, location, and schedule of use for such devices shall be determined pursuant to direction and approval by the City Engineer.
2. Prior to the issuance of a grading permit, the grading plan shall locate temporary desilting basins at all discharge points adjacent to drainage courses or where substantial drainage alteration is proposed. The exact design and location of such facilities shall be conducted pursuant to direction by the City Engineer.
3. As condition of future VTMs, the developer shall within 90 days of completion of grading activities, hydroseed landscape graded and common areas with appropriate ground cover vegetation consistent with the biology section mitigation requirements (e.g., use of native or noninvasive plants). These revegetated areas shall be inspected monthly by a qualified biologist until vegetation has been firmly established as determined by the City's grading inspector.
4. Compacted areas shall be scarified, where appropriate, to induce surface water infiltration and revegetation as directed by the project geologist, engineer, and/or biologist.
5. General Construction Activity Storm Water Permits (NPDES No. CAS000002) shall be obtained from the SWRCB prior to project implementation. Such permits are required for specific (or a series of related) construction activities which exceed five acres in size and include provisions to eliminate or reduce off-site discharges through implementation of a SWPPP. Specific SWPPP provisions include requirements for erosion and sediment control, as well as monitoring requirements both during and after construction. Pollution control measures also require the use of best available technology, best conventional pollutant control technology, and/or best management practices to prevent or reduce pollutant discharge (pursuant to SWRCB definitions and direction).
6. A Dewatering Waste Discharge Permit (NPDES No. CA0108804) shall be obtained for the removal and disposal of groundwater (if necessary) encountered during construction. Such permits are intended to ensure compliance with applicable water quality, and beneficial use objectives, and typically entail the use of BMPs to meet these requirements. Discharge under this permit will require compliance with a

number of physical, chemical, and thermal parameters (as applicable), along with pertinent site-specific conditions (pursuant to RWQCB direction).

7. Specified vehicle fueling and maintenance procedures and hazardous materials storage areas shall be designated to preclude the discharge of hazardous materials used during construction (e.g., fuels, lubricants and solvents). Such designations shall include specific measures to preclude spills or contain hazardous materials, including proper handling and disposal techniques and use of temporary impervious liners to prevent soil and water contamination.

Project Design

As conditions of future VTMs and to be included as notes and exhibits on the grading plan, the following mitigation measures would be required:

8. Postconstruction erosion control measures shall be implemented where proposed disturbance is adjacent to or encroaches within existing drainage courses and projected runoff velocities exceed 5 cfs.
9. Final project design shall incorporate all applicable BMPs contained in the City and State *Best Management Practices to be Considered in the Development of Urban Stormwater Management Plan*. Specifically, these may include measures such as the use of detention basins, retention structures, infiltration facilities, permeable pavements, vegetation controls, discharge controls, maintenance (e.g., street sweeping), and erosion controls.
10. Surface drainage shall be designed to collect and discharge runoff into natural stream channels or drainage structures. All project-related drainage structures shall be adequately sized to accommodate a minimum 50-year flood event (or other storm events pursuant to direction from the City).
11. Project operation and maintenance practices shall include a schedule for regular maintenance of all private drainage facilities within common development areas to ensure proper working condition. Public facilities shall be maintained by the City.
12. Surface and subsurface drainage shall be designed to preclude ponding outside of designated areas, as well as flow down slopes or over disturbed areas.
13. Runoff diversion facilities (e.g., inlet pipes and brow ditches) shall be used where appropriate to preclude runoff flow down graded slopes.

14. Energy-dissipating structures (e.g., detention ponds, riprap, or drop structures) shall be used at storm drain outlets, drainage crossings, and/or downstream of all culverts, pipe outlets, and brow ditches to reduce velocity and prevent erosion.
15. Long-term maintenance responsibility of the detention basins may be accepted by the City of San Diego or through other acceptable mechanisms (e.g., homeowners' association or assessment district).

The City Engineer shall verify that the precise plan mitigation measures are conditions for the approval of future proposed VTMs. The measures shall be completed prior to issuance of the Certificate of Occupancy.

2) Issue

Would the project result in alterations to the course or flow of floodwaters?

Impacts

Subarea Plans 1 and 2. The major natural drainage patterns and flood zones within Pacific Highlands Ranch would be preserved as open space, thereby minimizing impacts to the natural drainage system. Proposed development would occur primarily on the upland areas and would not be located in a Floodplain Fringe or Floodway zone. Major flood courses within the subarea would not be significantly altered by the proposed development.

As was discussed previously under Issue 1, increased hardscape associated with development of the subarea has the potential to increase runoff and floodwater flows.

Significance of Impacts

Subarea Plans 1 and 2. Impacts to the course and flow of floodwaters are mitigable to a level of less than significant through the incorporation of the mitigation measures and BMPs identified previously under Issue 1.

Mitigation, Monitoring, and Reporting

Subarea Plans 1 and 2. Impacts to floodwaters would be mitigated to a level of less than significant by incorporating the mitigation measures and BMPs identified for Issue 1 above. All flood control measures would be reviewed and approved by the City's Transportation and Drainage Design Division of the Public Works Business Center prior to construction.

3) Issue

What effect would implementation of the plan have on water quality in the San Dieguito River and Los Peñasquitos Creek drainage basins?

Impacts

Subarea Plans 1 and 2. Runoff from Pacific Highlands Ranch drains to the San Dieguito River and Lagoon and to Carmel Valley. Drainage from the subarea does not flow into the Los Peñasquitos Creek, although Pacific Highlands Ranch drainage through Carmel Valley eventually reaches Los Peñasquitos Lagoon.

Potential impacts to water quality which occur in conjunction with urban development include erosion of exposed soils and the resultant sedimentation of natural drainages, as well as runoff of urban pollutants into the natural drainage system. Also, grading and construction activities to implement the Pacific Highlands Ranch Plan would increase the potential for erosion and transport of material both within and downstream of the project site. Specifically, the removal of stabilizing vegetation cover and the creation of artificial slopes have the potential to generate erosion effects. The movement of sedimentary materials into the on-site canyons and off-site into the San Dieguito River and Lagoon and Carmel Valley and Los Peñasquitos Lagoon could produce significant impacts to surface water quality. The influx of such materials would be expected to increase the quantity of total solids, as well as several individual mineral organic and inorganic constituents. A reduction in water quality could have secondary adverse impacts on plant and animal life within these drainages and lagoons.

Accidental spills or leaks of certain construction materials (e.g., vehicle fuels) could adversely impact local surface water quality. In addition, disposal of groundwater extracted during dewatering of construction areas (if necessary) could impact local surface water quality through the presence of contaminants (e.g., suspended sediment added during excavation or pumping) and/or erosion in water discharge areas.

Over the long-term, implementation of the Pacific Highlands Ranch Plan would have the potential to increase the volume and rate of surface water runoff, possibly resulting in increased or continued erosion of soils in the subarea and siltation of natural drainages. There is also a potential for increased or continued reductions in runoff water quality. The increase in impervious surface area and change in landscape to roads, buildings, and domestic landscaping has two effects: (a) to increase the runoff from the site and (b) to reduce the ability of water to percolate into the groundwater reservoir. Irrigation and other sources of imported water also increase the amount of runoff. Uncontrolled runoff in steep slope areas, especially those with exposed soils or sparse vegetation, can cause erosion and increase sedimentation.

Water quality of runoff is likewise altered with urban development. Uncontrolled urban runoff could result in erosion and subsequent sedimentation of downslope or downstream water bodies. In addition, the runoff may be contaminated with pesticides, herbicides, fertilizers, or other “urban” pollutants, such as heavy metals, grease, and oil. Water running off rooftops picks up chemicals from construction materials; water flowing across streets and driveways picks up hydrocarbons and heavy metals associated with roadways and automobiles; and runoff from domestic gardens and agricultural or landscaped areas incrementally contributes fertilizers and pesticides. These pollutants could compromise the quality of downslope or downstream surface water and groundwater, affecting water quality both within Pacific Highlands Ranch and, ultimately, ending up in the San Dieguito River and Lagoon, Carmel Valley, Los Peñasquitos Lagoon, and the Pacific Ocean.

Significance of Impacts

Subarea Plans 1 and 2. The proposed development of Pacific Highlands Ranch has the potential to significantly impact water quality (both directly and cumulatively) in the San Dieguito River and Lagoon, Carmel Valley, and Los Peñasquitos Lagoon. Specifically, such impacts may be associated with short- and long-term erosion and sedimentation and construction-related contaminant discharge. The proposed project’s effects would be less adverse overall than those currently resulting from commercial agricultural activities on-site. The runoff of urban-generated pollutants is not considered significant (on a direct basis) due to the presence of existing regulatory controls and the anticipated incremental nature and extent of such pollutants, though the incremental contribution of urban pollutants would be cumulatively significant.

Mitigation, Monitoring, and Reporting

Subarea Plans 1 and 2. Direct impacts to water quality would be mitigated to a level of less than significant by incorporating the mitigation measures identified for Issue 1 above. Current plans call for the construction of desilting basins in the subarea (see Figure 4D-3 for alternative desilting basin locations) to reduce erosion and sedimentation during and after development. The exact number, size, design, and location of desiltation/retention basins will be determined in conjunction with future tentative map proposals. Monitoring and maintenance programs for these facilities would be prepared by future developers and after approval by the City, would be incorporated into the CC&Rs for the developments with these facilities in their common areas.

Implementation of the mitigation measures outlined in Issue 1 would not mitigate fully the associated cumulative effects to water quality in the subarea. These impacts would remain significant and unmitigated. Only the No Project alternative would avoid the potential cumulative impacts to water quality.

E. Landform Alteration/Visual Quality

Existing Conditions

a) Site Topography

The irregularly shaped project site consists of approximately 2,652 acres and contains open space, agricultural, nursery, estate residential units, permitted borrow site, and equestrian uses. The property is located south of Fairbanks Ranch, east of development in the Carmel Valley community planning area, and north of the undeveloped open space areas of Subarea V of the NCFUA. A complete discussion of the existing on- and off-site land uses is presented in Chapter 4.A., Land Use. In general, the property is dominated by agricultural fields with rural residential and agricultural maintenance operations which contrast with the smaller areas of native vegetation on the steep slopes and some of the drainages. The 29-unit Rancho Glens Estates residential development and the pet care facility CUP represent the only urbanized uses on the site.

The site topography varies from nearly flat mesas and drainages to steeply sloping hillsides with a substantial vertical elevation differences. On-site elevations range from approximately 40 feet above MSL in the northwestern end of the project area to approximately 428 feet above MSL in the eastern end of the subarea, south of Deer Canyon. Overall, the study area consists of three irregular mesa tops, generally sloping gently both to the north and south from the central mesa and bisected by several major drainages. Figure 4E-1 shows the existing topographic conditions on the project site. This map includes symbols showing the existing single-family residences in the Rancho Glens Estates project.

The site topography is also defined by a series of three prominent east-west drainages and ridgelines. These drainages consist of Gonzales Canyon in the northern portion of the site and McGonigle and Deer Canyons in the south. These tributary canyons drain westerly into either Carmel Valley or the San Dieguito River Valley. Gonzales Canyon empties westward into the San Dieguito Valley and is the primary drainage for the upland mesa areas north of Black Mountain Road. McGonigle Canyon, which is separated from Deer Canyon by Santa Monica Ridge, is the primary drainage for the on-site uplands located south of Black Mountain Road. McGonigle and Deer Canyons meet at the western end of Santa Monica Ridge and act as tributaries to the Carmel Valley drainage, located in the very southwestern portion of the subarea.

Approximately 444 acres (17 percent) of Pacific Highlands Ranch consist of slopes with a 25 percent or greater gradient (Figure 4E-2). These areas are located throughout the study area but are concentrated in the northern and southern portions of the subarea. The most prominent areas of 25 percent slopes are the north-facing slopes above La Zanja

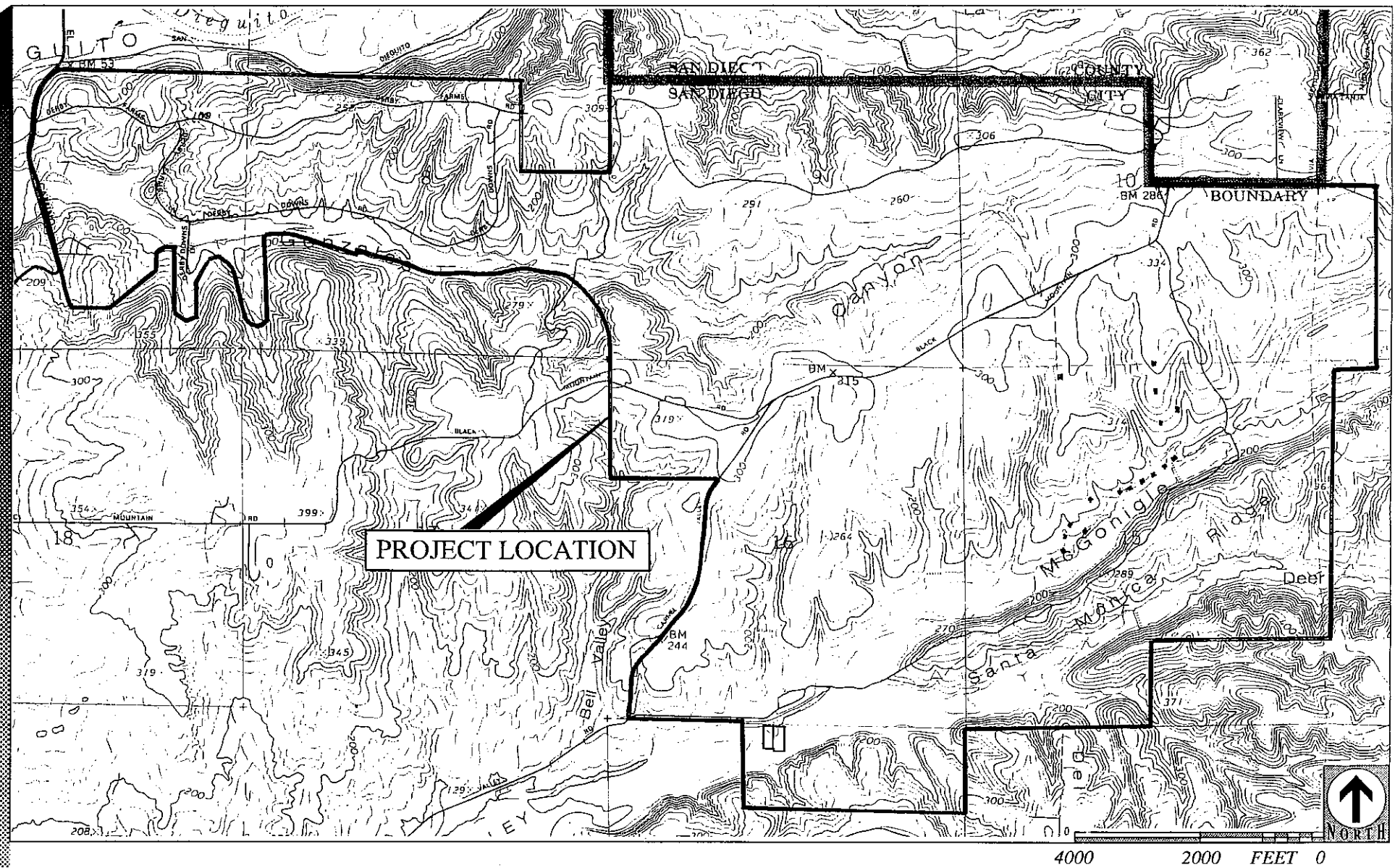
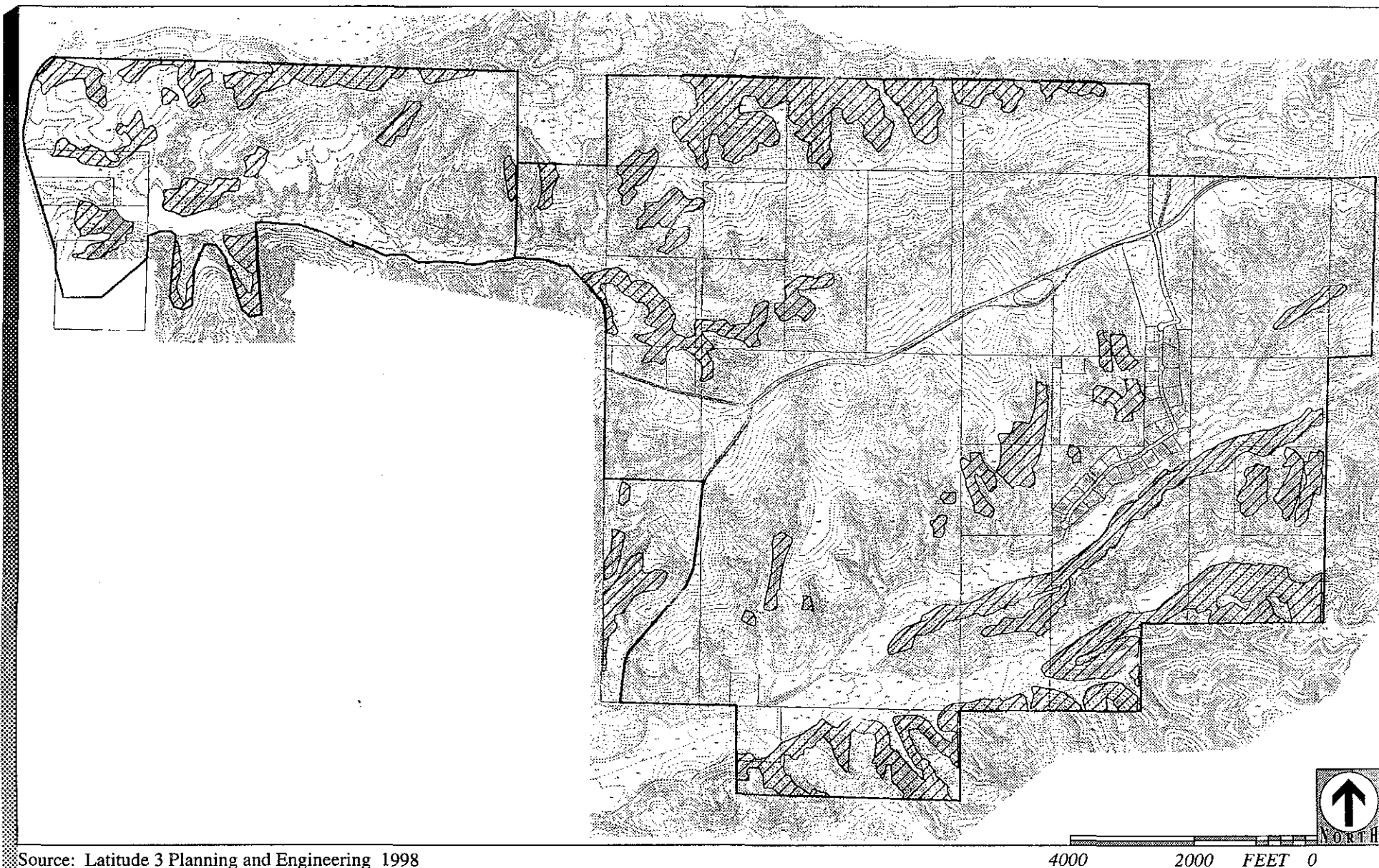


FIGURE 4E-1
Existing Site Topography



Source: Latitude 3 Planning and Engineering 1998


 25% and greater slopes

FIGURE 4E-2
Areas of 25% and Greater Slopes

Canyon along the northern boundary and north-facing slopes of both McGonigle and Deer Canyons.

b) Existing Aesthetic Character

The existing aesthetic character of the subarea is primarily rural and agricultural. The commercial agricultural operations and associated scattered residential uses on the more expansive mesa tops and gentler slopes dominate the landscape. However, the site's southern canyons (Deer Canyon, McGonigle Canyon, and the small on-site portion of Carmel Valley) provide a more isolated and undisturbed component to the overall aesthetic character. These canyons and associated steep north-facing slopes are the most significant visual features on the property. Photographs depicting the existing site conditions are discussed below and the photograph locations are shown Figure 4E-3.

Taken from the western central portion of the subarea, Photograph 4E-1 provides a representative view of the northern portion of the subarea, from the upper northwestern corner of the site to the northeastern corner. This figure shows rolling terrain and drainage systems that are dominant throughout the subarea and includes views off-site to the north in Fairbanks Ranch. The agricultural uses of this area are mainly pole-tomato cultivation, the dominant agriculture grown in the area (Photograph 4E-2).

Photograph 4E-3 is taken from the northwestern portion of the subarea looking west and shows the mesa tops and several drainages trending southwesterly toward Carmel Valley. Also, taken from the western boundary of the subarea, Photograph 4E-4 includes a northeasterly panoramic view of agricultural lands, including the upper reaches of Gonzales Canyon.

Photograph 4E-5, taken from the western central portion of the site, is a southerly view down the MSCP drainage which would provide the linkage between Carmel Valley and Gonzales Canyon. In addition to this drainage, the photo reveals the dominant feature in the southern portion of the subarea, the north-facing slopes of the Santa Monica Ridge.

Black Mountain Road traverses the study area roughly west to east in the central portion of Pacific Highlands Ranch. Photographs 4E-6 and 4E-7 are a panoramic view taken in the mid-central portion of the site looking east to south across the site. These photographs illustrate the agricultural uses of Pacific Highlands Ranch. This on-site view also includes a nursery just south of Black Mountain Road, the north-south drainage that runs into McGonigle Canyon, Santa Monica Ridge, and an agricultural area on the western boundary of Pacific Highlands Ranch. The Carmel Valley community can be seen bordering the southwest portion of the subarea.

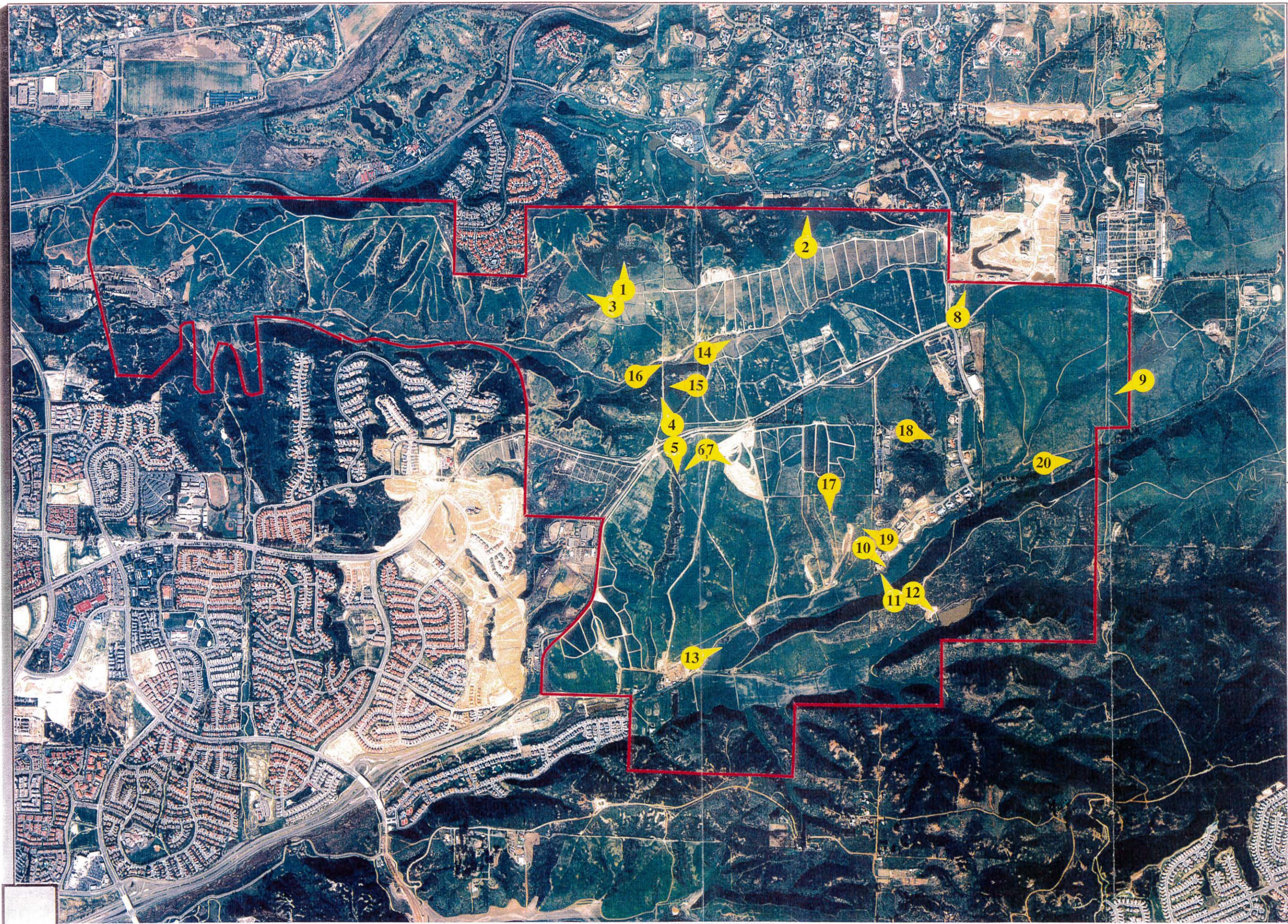
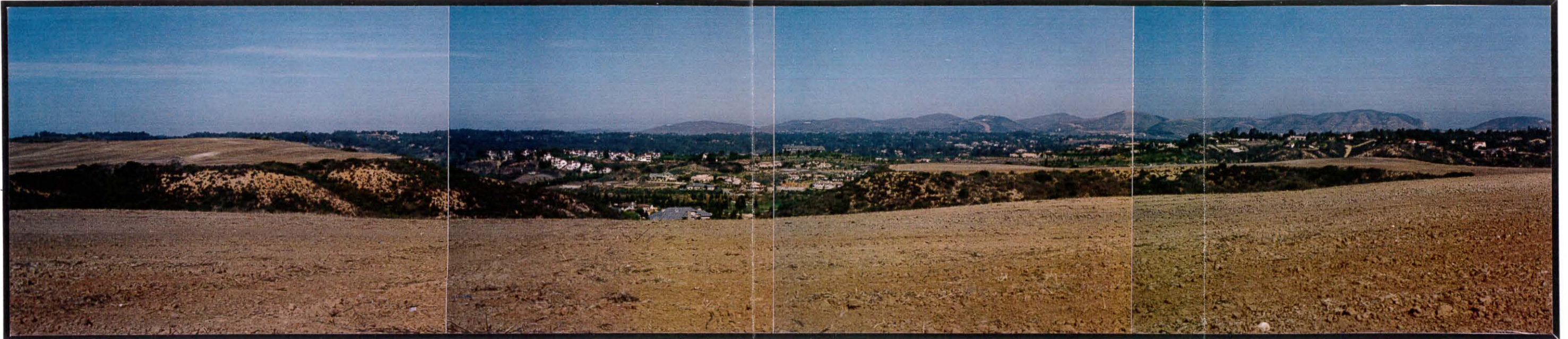


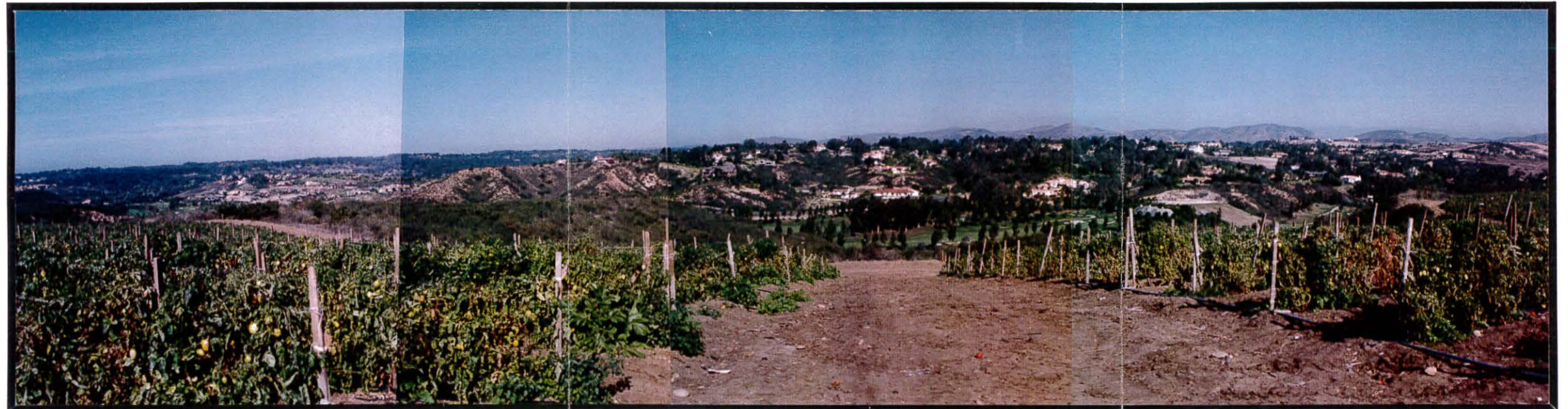
FIGURE 4E-3

Photograph
Location Map

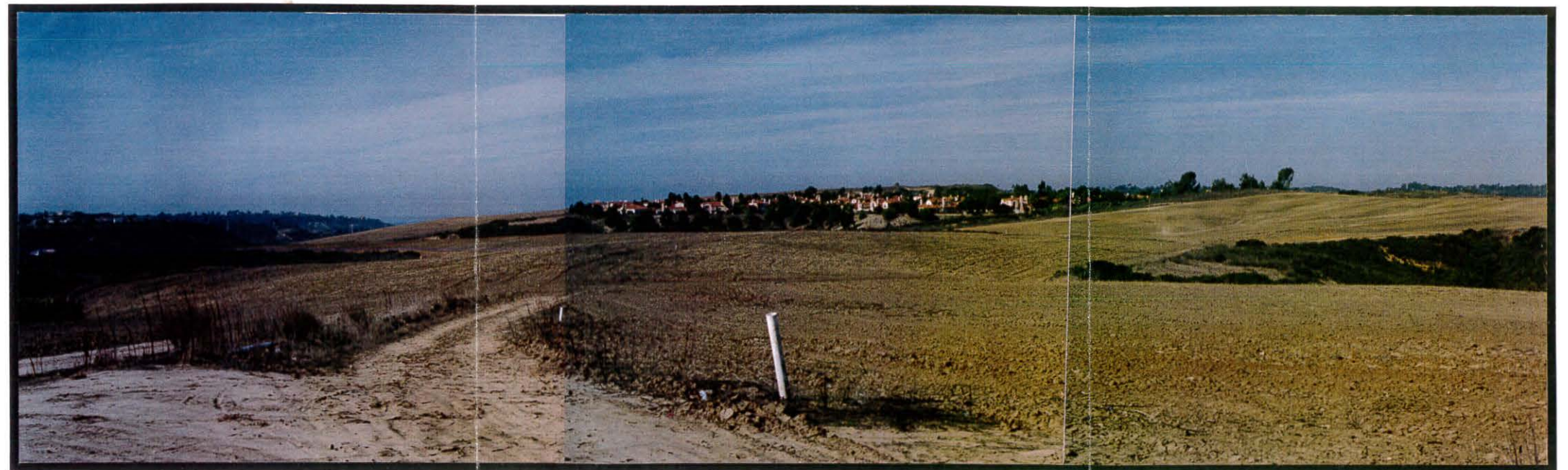




PHOTOGRAPH 4E-1
Northerly View from North Boundary of Project



PHOTOGRAPH 4E-2
Northerly View Toward Del Mar Country Club



PHOTOGRAPH 4E-3
Westerly View from Near Western Boundary



PHOTOGRAPH 4E-4
Panoramic View to the East from the Central Portion
of the Site



PHOTOGRAPH 4E-5
Southerly View toward McGonigle Canyon



PHOTOGRAPH 4E-6
Panoramic View from Black Mountain Road
Looking East to South



PHOTOGRAPH 4E-7
Panoramic View from Black Mountain Road
Looking South to West

Photograph 4E-8, taken from the northeastern portion of the area looking north, shows the intersection of Black Mountain Road and Caminito Mendiola with The Lakes subdivision in the county of San Diego.

A westerly view of the subarea down Carmel Valley, taken from the eastern boundary, is provided in Photograph 4E-9. The north-south SDG&E easement is a dominant feature in this photo, as is Santa Monica Ridge and McGonigle Canyon to the south and the nursery operations.

Photograph 4E-10 is a southeasterly view of the southern portion of the Rancho Glens Estates project within the context of the steep north-facing slopes of Santa Monica Ridge to the south. This ridgeline is part of the MSCP open space preserve.

Taken from atop Santa Monica Ridge, Photograph 4E-11 illustrates a northwesterly view from the southern portion of the subarea. Apparent from this view are the mesa tops prevalent throughout the central portion of the subarea, the south-trending drainages, and the Ranch Glens Estates project along Caminito Mendiola. Photograph 4E-12, taken from the same location, looks southeast from Santa Monica Ridge down into Deer Canyon. This photo also shows the naturally vegetated hillsides prevalent in the southern portion of the subarea and the Deer Canyon pond.

Photograph 4E-13 looks east from the western entrance into McGonigle Canyon north of Santa Monica Ridge and Deer Canyon south of the ridge.

Photograph 4E-14 provides an easterly view toward the upper reaches of Gonzales Canyon, and across the mesa tops from the western central portion of the project site. Photograph 4E-15 taken from approximately the same location, looks west towards the Gonzales Canyon wildlife corridor and also shows a portion of the planned north-south wildlife corridor. The existing Carmel Valley community is a component of the background view. Photograph 4E-16 taken from the bottom of Gonzales Canyon, nearer the project's western boundary, provides a easterly view through the canyon in the vicinity of a planned trail leading easterly toward the upper reaches of Gonzales Canyon.

Taken from the center of the subarea, Photograph 4E-17 looks south towards the north-facing slopes of Santa Monica Ridge in the MHPA and the existing Ranch Glens Estates subdivision. Foreground views in this photograph would encompass the alignment for SR-56. As seen in this photograph, the dominant features in the southern portion of the subarea are the Santa Monica Ridge, which crosses the entire subarea, and the rolling mesa tops.

Photograph 4E-18 taken from atop a mesa in the eastern central portion of the subarea, shows the naturally vegetated drainage systems that trend north-south in the subarea. An existing Ranch Glens Estates residence is shown in the center of the photograph, as well



PHOTOGRAPH 4E-8
Northeast View from Eastern Boundary of Project



PHOTOGRAPH 4E-9
View Looking West from Eastern Project Boundary



PHOTOGRAPH 4E-10
Southerly View toward Santa Monica Ridge



PHOTOGRAPH 4E-11
Looking Northwest from Santa Monica Ridge



PHOTOGRAPH 4E-12
Southerly View toward Deer Canyon



PHOTOGRAPH 4E-13
Easterly View toward Santa Monica Ridge



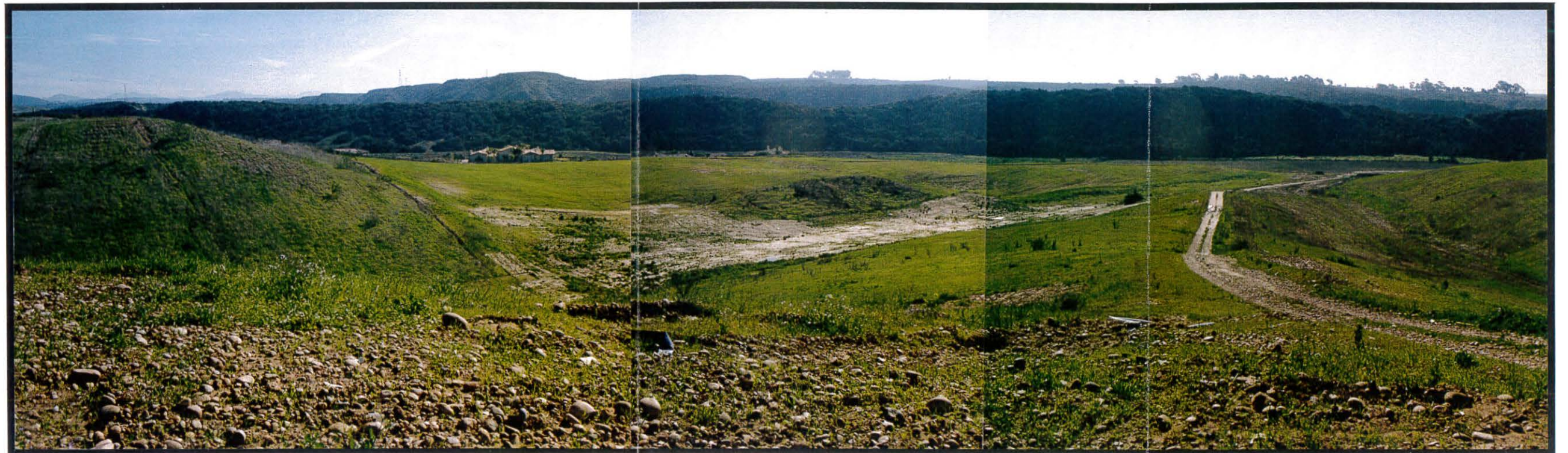
PHOTOGRAPH 4E-14
Looking East from Planned Overlook to Urban Amenity



PHOTOGRAPH 4E-15
Looking West at Wildlife Corridor from Planned Del Mar Heights Road



PHOTOGRAPH 4E-16
Looking East along Gonzales Canyon/Urban Amenity



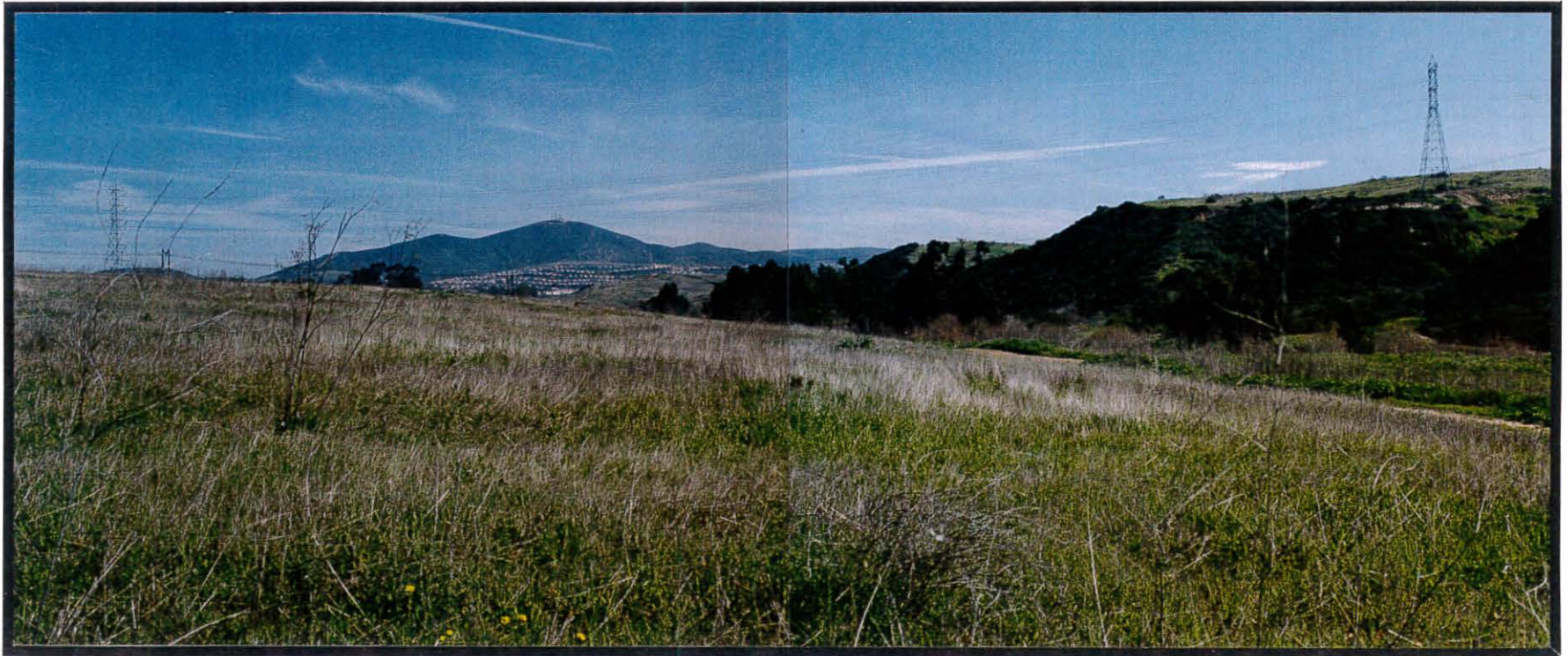
PHOTOGRAPH 4E-17
Looking South from Planned Overlook to Santa Monica Ridge



PHOTOGRAPH 4E-18
Looking Southeast toward Plan 2 Freeway Alignment



PHOTOGRAPH 4E-19
Looking Northwest from Rancho Glens Estates



PHOTOGRAPH 4E-20
Looking East from Planned Trail in McGonigle Canyon

as other residences in the southern portion of the proposed project site. Photograph 4E-19 provides a northerly view of the subarea from the Rancho Glens Estates in the southern portion of the project site. This photograph shows the sloping mesas and ridgelines west of this subdivision.

Taken near the eastern boundary of the subarea just north of McGonigle Canyon, Photograph 4E-20 provides an easterly view along this drainage corridor in the vicinity of a planned trail.

c) Views of the Project Site

Views into Pacific Highlands Ranch from off-site public locations include distant and limited views from Interstate 5 and the San Dieguito River Park. However, these views consist primarily of only the approved Del Mar Highlands Estates project portion of the subarea. Views from undeveloped lands and nearby residential developments of the subarea from the west (Carmel Valley community planning area), south, and east are extensive and the prevailing impression is of rural uses and open space. Views into the subarea from the north are primarily interrupted by the ridge rising south of the San Dieguito River. However, open views exist into the site from the estate residential area (i.e., Senterra development) along the northwestern boundary. Travelers easterly along Del Mar Heights Road have vistas into the subarea, and there are also limited views easterly into the site from the current terminus of SR-56.

d) Mature Tree Stands

Areas of southern sycamore riparian woodland with mature sycamore trees are located in McGonigle and Deer Canyons (see Photograph 4E-13) and eucalyptus groves exist around the nursery south of Black Mountain Road.

Landform Alteration/Visual Quality Issues

1. Would implementation of the plan result in substantial alteration of the existing character of the area?
2. Would implementation of the plan result in a substantial change in topography or ground surface relief features?
3. Would implementation of the plan result in the loss, covering, or modification of any unique geologic or physical features, such as canyons, bluffs, or hillside with a slope gradient in excess of 25 percent?
4. Would implementation of the plan result in the loss of any distinctive or landmark tree(s) or a stand of mature trees?

1) Issue

Would implementation of the plan result in substantial alteration of the existing aesthetic character of the area?

Impacts

Subarea Plan 1 and Plan 2. Regardless of the proposed subarea plan and SR-56 alignment, the conversion of primarily rural agricultural lands with few access roads to the proposed urban uses under both plans would substantially alter the existing aesthetic character associated with the property. The development of between 4,974 new residential units and related land uses shown in Figures 3-1 and 3-2 combined with the construction of SR-56 through the subarea would significantly modify the character of the site and affect the visual appearance from on- and off-site areas.

On-site Views

On-site, views from the Rancho Glens Estates development would be substantially altered and will be changed from open views of rural agricultural lands to partial views west of residential uses and SR-56 and easterly views of elementary school/park uses. Southerly views toward McGonigle Canyon would not be affected under either plan. The alignment of SR-56 under Plan 1 would be within approximately 500 feet of the westernmost Rancho Glens Estates dwelling unit, but several of the residences would be below the proposed grade of the freeway. This grade separation combined with the small ridgeline west of these units limits expansive westerly views into the interior of

development area for several of the existing homes in Rancho Glens Estates (see Photograph 4E-19).

The proposed Overlook Park will provide future residents elevated views of the subarea from selected vantage points (see Figures 3-6 and 3-8). These Overlook Parks are planned to provide access to the extensive trail system, and offer views of the natural open space system and wildlife corridors. As shown in Photographs 4E-14 and 4E-15, the proposed Overlook Park in the western portion of the subarea would provide views of the western MHPA and Gonzales Canyon, and also access to multi-use trail system. An Overlook Park proposed in the eastern portion of Pacific Highlands Ranch, is also integrated into the multi-use trail system, and would provide southerly views of the undisturbed portion of the subarea. This location would offer future residents views of the MHPA, McGonigle Canyon, and Santa Monica Ridge, as shown in Photograph 4E-9.

Views from the proposed SR-56 under either SR-56 alignment (see Photographs 4E-7, 4E-13, and 4E-19 for representative freeway locations) would generally allow motorists views of the proposed residential development to the north and the natural open space system to the south. Aesthetic impacts associated with SR-56 would also include any noise walls greater than six feet in height adjacent to the freeway and other noise attenuating measures such as berms. These impacts are also described in the SR-56 EIR (City of San Diego 1998).

Off-site Views

Off-site views from the north from public parks and viewing areas into the subarea do not exist. The ridgeline which generally forms the northern boundary of the subarea screens public views into the central portion of the site from areas within the San Dieguito River Valley or La Zanja Canyon. However, views into the site from surrounding residential areas would occur. For example, the estate residential and moderately low residential areas on-site would be visible from the Senterra residential development at the northwestern boundary of the site. Likewise, open expansive views of much of the central portion of the developed site would occur from the existing residential areas, Torrey Heights park, and existing Del Mar Heights Road along the western boundary within Carmel Valley and from The Lakes project at the northeastern corner of the site in the County of San Diego. Off-site to the south, much of the developed project site (e.g., SR-56 and the Town Center Village) would also be visible northerly from Shaw Ridge Road within Subarea V. Along with the long-term aesthetic impacts associated with the developed site, there would also be interim visual impacts from off-site areas during the phased construction of the project.

Significance of Impacts

Subarea Plan 1 and Plan 2. The substantial change in aesthetic character described above would occur under both land use scenarios. This change represents a significant direct and cumulative impact from on- and off-site locations. The development of the project site would incrementally contribute to the change the aesthetic character of the subregion in conjunction with the existing and planned development in Carmel Valley and Subareas IV and V.

Mitigation, Monitoring, and Reporting

Subarea Plan 1 and Plan 2. The preservation of MSCP and urban amenity open space along with implementation of the landscaping concept as future tentative subdivision maps are processed within Pacific Highlands Ranch would reduce the identified aesthetic impacts. These measures would not reduce the impacts to below a level of significance. Avoidance of the impact would be accomplished by the No Project alternative.

Specific mitigation measures would be required at the future tentative map stage; specifically, prior to issuance of a grading permit, the Development Services Development Coordinator shall review the grading and landscape plans for consistency with the subarea plan guidelines. Upon completion of the grading for any future tentative map within Pacific Highlands Ranch, and associated off-site conditions, the developer shall submit a letter to Development Services from a qualified consultant certifying that all landscaping for the major manufactured slopes (e.g., roadway slopes) has been implemented. Monitoring shall be required to assure the long-term establishment of the landscaping. The maintenance program shall be effective for a three-year period following the installation of the plantings or until such time as all plantings are established. The long-term monitoring shall establish an inspection schedule, establish replanting specifications, and require written notification once a year to Development Services Department Development Coordinator by the applicant-hired consultant to verify the status of the revegetation.

If the revegetation effort includes the reestablishment of native habitat within or adjacent to the MHPA, a five-year monitoring program would be required. For erosion control or other revegetation outside the MHPA and not part of any biological mitigation, the revegetation plan must conform with the City's Landscape Technical Manual with a monitoring period of 25 months.

2) Issue

Would implementation of the plan result in a substantial change in topography or ground surface relief features?

Impacts

a) Subarea Plan 1

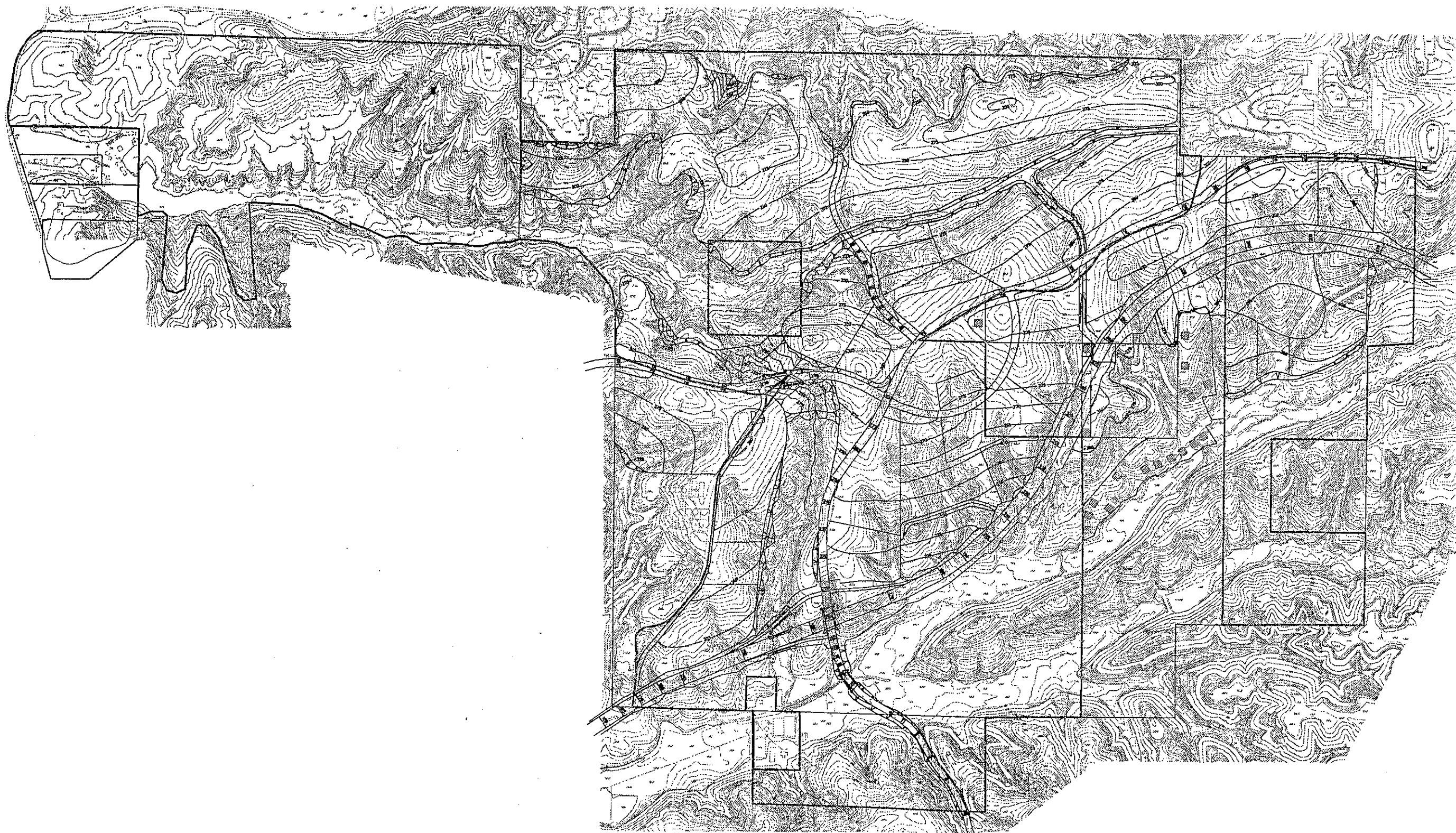
Development of Pacific Highlands Ranch pursuant to Plan 1 would substantially alter the existing landform. The undisturbed character of the site north of McGonigle Canyon would be replaced by the development of approximately 1,100 acres (41 percent) of the project site and require grading on the numerous mesa top areas and tributary drainages. With the exception of the MSCP north-south wildlife corridor and the steep slopes along the northern boundary, the project site north of McGonigle Canyon would be graded to accommodate the proposed land uses. In the southern portion of the site, McGonigle/Deer Canyons and Santa Monica Ridge would be retained as MSCP open space. Figure 4E-4 illustrates the conceptual grading plan proposed under Plan 1 for Pacific Highlands Ranch. The proposed concept grading plan for Plan 1 incorporates the grading plans associated with SR-56 Alignment "F." Grading for the freeway through Pacific Highlands Ranch would disturb approximately 150 acres of the site.

Overall, the total earthwork quantity for the entire subarea under Plan 1 would be approximately 14,000,000 cubic yards of excavation and fill, which would be balanced over the entire site. The amount of earthwork to implement the proposed grading concept would require approximately 11,200 cubic yards per graded acre, and the maximum depth of cut would be approximately 30 feet and the maximum depth of fill would be approximately 50 feet.

Development of the various land uses throughout the project site would require numerous manufactured slopes greater than 30 feet in height, with a maximum height of approximately 75-125 feet. Figure 4E-3 shows these slopes under Plan 1.

b) Subarea Plan 2

In a similar fashion, development of Pacific Highlands Ranch pursuant to Plan 2 would also substantially alter the existing landform. Figure 4E-5 illustrates the grading concept proposed under Plan 2 for Pacific Highlands Ranch. As with Plan 1 above, the proposed concept grading plan for Plan 2 incorporates the grading plans associated with SR-56. Grading for the freeway through Pacific Highlands Ranch under Plan 2 would disturb approximately 150 acres.



Map Source: Latitude 33 Planing and Engineering 1998



FIGURE 4E-4
Grading Concept
Plan 1



Map Source: Latitude 33 Planing and Engineering 1998

2800 1400 FEET 0



FIGURE 4E-5
Grading Concept
Plan 2

Overall, the total earthwork quantity for the entire subarea under Plan 2 would be nearly identical to the cubic yards of excavation and fill discussed above for Plan 1. Development of the various land uses throughout the project site under Plan 2 would also require numerous manufactured slopes greater than 30 feet in height, with a maximum height of ~~50~~ 125 feet.

c) Carmel Valley Neighborhood 10 Precise Plan

As noted in the Project Description (see Figures 3-5 and 3-6), another component of the proposed MHPA boundary adjustment includes encroachment into previously designated open space within the Neighborhood 10 Precise Plan. As described in the previous EIRs for Neighborhood 10 (City of San Diego 1993 and 1997), landform alteration impacts were identified as significant. Filling of this small tributary canyon within the central portion of Neighborhood 10 (approximately 8.1 acres) to create a pad area for 22-24 additional single-family units would create additional landform alteration impacts.

Significance of Impacts

a) Subarea Plan 1 and Plan 2

Both grading concepts associated with the proposed land use scenarios would require substantial alteration of the topography to develop and access the site. The amount of earthwork anticipated under both Subarea Plans would substantially exceed the City's significance threshold for grading impacts of 2,000 cubic yards per graded acre. The filling of drainages and grading of the broad mesa areas would represent alterations to the existing topography and are considered to be significant direct and cumulative landform alteration impacts.

b) Carmel Valley Neighborhood 10 Precise Plan

The additional area of grading (canyon fill and associated manufactured slope) within Neighborhood 10 would represent a significant landform alteration impact.

Mitigation, Monitoring, and Reporting

a) Subarea Plan 1 and Plan 2

Specific mitigation measures which would be required at the future tentative map stage include that prior to issuance of a grading permit, Development Services shall review the grading plans for consistency with the subarea plan guidelines. These measures include using slope rounding and blending techniques where manufactured slopes meet natural slopes, varying slope gradient and width, and contouring edges to achieve a more natural appearance. Implementation of these measures would reduce the landform alteration

impact, but not to below a level of significance. However, only implementation of the No Project alternative would avoid the landform alteration impact. These adverse effects comprise significant and unmitigable direct and cumulative impacts of the proposed project.

b) Carmel Valley Neighborhood 10 Precise Plan

As described in the previous EIRs for Neighborhood 10 (City of San Diego 1993 and 1997), mitigation for landform alteration impacts include that all manufactured slopes greater than 10 feet in height be contour graded and minimized during the final engineering design. As with the landform alteration impacts associated with the Subarea Plans, these measures would not reduce the impact to below a level of significance. Implementation of the contour grading measures would occur at the time grading permits are approved.

3) Issue

Would implementation of the plan result in the loss, covering, or modification of any unique geologic or physical features, such as canyons, bluffs, or hillside with a slope gradient in excess of 25 percent?

Impacts

a) Subarea Plan 1

The majority of natural slopes with a gradient in excess of 25 percent in Pacific Highlands Ranch would be left as open space under Plan 1. These steep slope areas occur south of the northern subarea boundary in the central portion of the site as well as west of Carmel Valley Road and south of McGonigle Canyon. Based on the slope encroachment analysis prepared for the project, approximately 63.7 acres (17.3 percent) of the 369 acres (excluding previously approved projects) of steep slopes would be disturbed under Plan 1. These encroachment areas consist of small locales in the central and western portion of the project site (Figure 4E-6). and exceed the 7 percent encroachment allowance per City thresholds. Steep slope encroachment associated with the grading necessary for SR-56 is addressed in the EIR for that project.

b) Subarea Plan 2

As with Plan 1, the majority of natural slopes with a gradient in excess of 25 percent in Pacific Highlands Ranch would be left as open space under Plan 2. Based on the slope encroachment analysis prepared for the project, approximately 70.4 acres of the 369 acres (19.1 percent) of the steep slopes would be disturbed. These encroachment areas would



Map Source: Latitude 33 Planing and Engineering 1998

FIGURE 4E-7

Areas of Encroachment into 25% Slopes
Plan 2

also consist of small locales in the central and western portion of the project site (Figure 4E-7) and exceed the 7 percent encroachment allowance per City thresholds.

Significance of Impacts

Subarea Plan 1 and Plan 2. Based on the steep slope encroachment analysis prepared for both subarea plans (see Land Use, Chapter 4.A., Issue 2), significant impacts are anticipated on canyons, bluffs, or hillsides in Pacific Highlands Ranch.

Mitigation, Monitoring, and Reporting

Subarea Plan 1 and Plan 2. Although both subarea plans have been designed to minimize impacts to steep slopes, strict compliance with the encroachment thresholds in the development regulations of RPO would require a project redesign. Both plans' inconsistency with the RPO encroachment provisions can be avoided with implementation of the No Project alternative and mitigated to below a level of significance by adoption of a RPO alternative. These alternatives are discussed in Chapter 8 of this EIR.

4) Issue

Would implementation of the plan result in the loss of any distinctive or landmark tree(s) or a stand of mature trees?

Impacts

Subarea Plan 1 and Plan 2. Mature sycamore stands occur within Deer and McGonigle Canyons. There is also an area of southern willow scrub in the eastern portion of Gonzales Canyon. The mature sycamore stands in western Gonzales Canyon and McGonigle Canyon east of its confluence with Deer Canyon are all located in areas planned to be part of the MSCP preserve design and would not be impacted under either land use plan. The southern willow scrub vegetation in upper reaches of Gonzales Canyon would be retained as natural vegetation within the urban amenity.

Significance of Impacts

Subarea Plan 1 and Plan 2. No significant impacts are anticipated.

Mitigation, Monitoring, and Reporting

Subarea Plan 1 and Plan 2. No mitigation measures would be required.

F. Cultural Resources

This section of the MEIR is based on a previously completed technical report entitled Historical/ Archaeological Survey Report for Pacific Highlands Ranch Future Urbanizing Area, San Diego, California (Gallegos & Associates 1993). That report describes the results of a complete survey of the subject property conducted in 1993. The Gallegos & Associates report is included in this MEIR as Appendix D1. An updated survey report prepared by RECON is included in this MEIR as Appendix D2. References cited in this section can also be found in Appendix D2.

In addition to the work done by Gallegos & Associates, information on nine cultural resource sites, located in the central portion of Pacific Highlands Ranch, was obtained from a series of reports prepared by KEA Environmental for the City of San Diego Engineering and Capital Projects Department and Caltrans, District 11. These reports provide information on the cultural resource significance testing that was completed during analysis of four alternative alignments for State Route 56 between Interstate 5 and Interstate 15. The testing completed by KEA was designed to determine historic property eligibility for nomination to the National Register of Historic Places.

Based on the information provided in these completed technical reports RECON has conducted focused site surveys and significance evaluations at 13 locations within the project area. The fieldwork was designed to expend every effort to relocate previously recorded sites, gather field information and determine the significance of all of the sites within the areas determined to be potentially impacted by the proposed development of Pacific Highlands Ranch. These selected sites represent a portion of the total number of sites recorded in the Pacific Highlands Ranch boundaries. The sites listed on Table 4F-1 are under consideration because they meet the following criteria: (1) they are located within areas that could be impacted from currently proposed conceptual grading for Subarea Plans 1 and 2; and (2) these are sites for which significance testing or data recovery efforts have not been completed. The remainder of the sites in the Pacific Highlands Ranch project area were eliminated from consideration because they have been destroyed, are within areas of designated open space, have previously been subjected to significance evaluation in conjunction with the SR-56 EIRs and found to be not significant, and/or they have been subjected to significance evaluation and found to be "important" resource areas.

Existing Conditions

The cultural resource sites that are identified within Pacific Highlands Ranch represent both historic and prehistoric era human use and settlement. Fifty-two sites are recorded with the South Coastal Information Center (SCIC) within Pacific Highlands Ranch. In addition, there are 11 isolates plotted for this same area. Thirteen of these sites are

**TABLE 4F-1
SUMMARY OF SITE STATUS**

Site Designation (CA-SDI-)	Status
-7205	Tested by RECON, results provided in this document
-13098	Tested by RECON, results provided in this document
-6697/H	Tested by RECON, results provided in this document
-13092	Tested by RECON, results provided in this document
-6913	Tested by RECON, results provided in this document
-6914	Tested by RECON, results provided in this document
-13093	Tested by RECON, results provided in this document
-14002 (-6916, -6917)	Tested by RECON, results provided in this document
-6701*	Tested by RECON, results provided in this document
-6915*	Tested by RECON, results provided in this document
-6921*	Tested by RECON, results provided in this document
-6920/H*	Tested by RECON, results provided in this document
-6919*	Tested by RECON, results provided in this document
-10138*	Tested by RECON, results provided in this document
-7201*	Tested by RECON, results provided in this document
-7203*	Tested by RECON, results provided in this document
-6911	Not significant (KEA)
-13099	Not significant (KEA)
-10221	Not significant (KEA)
-6918	Not significant (KEA)
-7206	Not significant (KEA)
-6696	Not significant

TABLE 4F-1
SUMMARY OF SITE STATUS
 (continued)

Site Designation (CA-SDI-)	Status
-6698	Not significant
-6700	Not significant
-13095	Mapped in open space, index at TM
-13097	Mapped in open space, index at TM
-13091	Mapped in open space, index at TM
-13099	Mapped in open space, index at TM
-7202	Mapped in open space, index at TM
-7204	Mapped in open space, index at TM
-13096	Potentially eligible for nomination to the National Register/possible RPO significance (KEA)
-6912	Potentially eligible for nomination to the National Register/possible RPO significance (KEA)
-14003	Potentially eligible for nomination to the National Register/possible RPO significance (KEA)
-14562	Potentially eligible for nomination to the National Register/possible RPO significance (KEA)
-13101/H	May have state or local significance, mapped in open space
-14001/H	May have state or local significance, mapped in open space

*Sites that were not relocated in 1993 during the survey by Gallegos & Associates.

recorded within the Del Mar Highlands project boundaries and are not dealt with further in this report. An extensive testing and data recovery effort was completed for these sites and presented in The Cultural Resources of San Dieguito Estates (Norwood and Walker 1980). The remaining 39 sites are listed in Table 4F-2 by their status as had been determined by previously completed fieldwork or research. KEA Environmental has been conducting significance evaluations at a number of sites, which fall within a variety of proposed alignment corridors for a portion of SR-56. They have completed evaluation of nine prehistoric sites and two historic-era properties, which are within Pacific Highlands Ranch. These sites lie within the central portion of Pacific Highlands Ranch. Two additional sites were evaluated by Caltrans archaeologists during early stages of the SR-56 planning (Rosen 1989; Dominici 1989).

a) Background - Prehistory

San Diego County was occupied prehistorically by at least two archaeologically distinctive cultural groups. The Early Period is traditionally divided into the San Dieguito and La Jolla complexes. The San Dieguito has been generally accepted as the first sedentary inhabitants of the region, occupying San Diego County as early as 9,000 years ago. The initial occupation (San Dieguito Complex) is believed to represent people who hunted large and small game, fished, milled seeds, and collected and processed plants and various species of shellfish.

Extensive use of milling, and a heavy reliance on coastal resources characterize the La Jolla/Pauma Complex. Archaeological sites reflecting this time period include coastal habitation sites with significant quantities of shell, inland hunting/gathering and foraging camps, and quarry sites. The San Dieguito Complex and the La Jolla/Pauma Complex may represent the same cultural heritage. There is some controversy about the extent to which these differing patterns reflect temporal differences or regionally adaptive strategies. Human occupation between 1,300 years ago (Late Period) and contact with Spanish colonial forces is archaeologically documented by numerous Kumeyaay/Diegueno and Luiseno habitation sites. These sites tend to be located in proximity to fresh water and indicate a more sedentary existence for aboriginal groups during the Late Period. Rose Canyon, Sorrento Valley, and Mission Valley are just a few of the areas in the county where these villages were established. Artifacts and cultural patterns reflecting the Late Period occupation are composed of small projectile points, pottery, obsidian from Obsidian Butte, and cremation of deceased group members. The project area falls within the defined boundary of Kumeyaay/Diegueno territory, as Luiseno people are recognized further to the north.

b) Background - History

The earliest historical documentation of the project area is associated with the Rancho Peñasquitos and Rancho San Dieguito Mexican Period land grants. Land grants were

TABLE 4F-2
SUMMARY AND STATUS OF CULTURAL RESOURCE SITES IN SUBAREA III

Site Number	Status	Recommendation	Effect/Implementation	Site Type
SDI-13101H	Not eligible for National Register	Determine State and local significance	Open space - no impact	Historic homestead
SDI-14001H	Not eligible for National Register	Determine State and local significance	Open space - no impact	Historic map location
SDI-6911	Not eligible for National Register	No further work	No significant effect	Habitation
SDI-13099	Not eligible for National Register	No further work	No significant effect	Lithic scatter
SDI-10221	Not eligible for National Register	No further work	No significant effect	Lithic scatter
SDI-6918	Not eligible for National Register	No further work	No significant effect	Camp/habitation
SDI-13096	Potentially eligible for National Register	Avoidance	Destroyed by grading	Habitation
SDI-7206	Not eligible for National Register	No further work	No significant effect	Lithic scatter
SDI-6912	Loci B and E eligible for National Register	Avoidance	Destroyed by grading	Habitation
SDI-14003	Potentially eligible for National Register	Avoidance	Destroyed by grading	Shell midden
SDI-14562	Potentially eligible for National Register	Avoidance	Destroyed by grading	Habitation
SDI-7205	Not significant	Testing completed	No significant effects	Lithic scatter
SDI-6802	Outside project area	Further testing needed	Implement testing program	Camp
SDI-13095	Open space	NA	Index prior to Tentative map	Camp
SDI-13097	Open space	NA	Index prior to Tentative map	Lithic scatter
SDI-13098	Tested	Not significant/no further work	No significant effect	Habitation
SDI-6697/H	Tested/Open space	Avoidance	Index prior to Tentative map	Gonzalez Canyon Adobe
SDI-6696	Tested	Not significant/no further work	No significant effect	Habitation
SDI-6698	Tested	Not significant/no further work	No significant effect	Lithic scatter
SDI-6701	No longer exists	Not significant.	No significant effects	Camp
SDI-6700	Tested	Not significant/no further work	No significant effect	Camp

TABLE 4F-2
SUMMARY AND STATUS OF CULTURAL RESOURCE SITES IN SUBAREA III
(continued)

Site Number	Status	Recommendation	Effect/Implementation	Site Type
SDI-13091	Open space	NA	Index prior to Tentative map	Lithic scatter
SDI-13092	Tested	Not significant/no further work	No significant effect	Lithic scatter
SDI-6913	Tested	Not significant/no further work	No significant effect	Lithic scatter
SDI-6914	Tested	Not significant	No significant effect	Shell midden
SDI-13093	Tested	Not significant	No significant effect	Lithic scatter
SDI-6915	No longer exists	Not significant	No significant effects	Habitation
SDI-6916	Same as SDI-14002/Tested	Not significant	No significant effects	Habitation
SDI-6917	Same as SDI-14002/Tested	Not significant	No significant effects	Habitation
SDI-14002	Tested	Not significant	No significant effects	Camp
SDI-6921	Located on the Brown Parcel	NA	NA	Habitation
SDI-6920H	No longer exists	Not significant	No significant effects	Historic trash
SDI-6919	No longer exists	Not significant	No significant effects	Camp
SDI-13099	Open space	NA	Index prior to Tentative map	Lithic scatter
SDI-10138	No longer exists	Not significant	No significant effects	Lithic scatter
SDI-7201	No longer exists	Not significant	No significant effects	Lithic scatter
SDI-7202	Open space	NA	Index prior to Tentative map	Lithic scatter
SDI-7203	No longer exists	Not significant	No significant effects	Lithic scatter
SDI-7204	Open space	NA	Index prior to Tentative map	Camp

NA = not applicable.

made to Mexican citizens after Spanish colonial rule was ended. The project area was most likely used as range for cattle grazing, a common practice during both the Spanish and Mexican Periods and of early rancho practices. The generally poor quality of grazing, in particular during dry years, made the use of large tracts of land necessary.

Settlement of the study area occurred as a result of other agricultural endeavors. During the American Period, settlement was sparse and significantly affected by environmental conditions that included generally low rainfall, unreliable sources for fresh water or irrigation, and no direct means of transporting goods to a broader market, other than by sea. The latter problem was finally resolved in 1885 with completion of a railway to San Diego.

An 1876 map of the area reveals that limited settlement had occurred within, and directly adjacent to, Pacific Highlands Ranch. A house is shown and labeled as belonging to Rodriguez. In addition, buildings and features associated with the McGonigle family are depicted; including a house, cabin, fence, field, and "county road." As indicated on this map, Carmel Valley was known as Cordero Valley. The valley was named for the original settler, Cordero, who was a retired soldier from the San Diego Presidio. It was the McGonigle family, however, who established homesteads and owned some 2,000 acres of the valley.

A 1901 road survey map also depicts "McGonigle's house," "Ginter's barn," and the road labeled as the Del Mar and Lusardi Road. The location of the road corresponds to the county road shown on the 1876 map. The road, the Rodriguez houses, and McGonigle dwellings are also shown on an official map of San Diego for this period (Beasley 1889). Before the turn of the century, the McGonigle family owned a large portion of land within the project area. Felix McGonigle was the head of the family, which included several sisters and a brother-in-law. Felix came to the United States from Ireland in 1848 and was followed by other members of the family in 1872. The 1900 population census lists Felix McGonigle as a property owner and other family members as partners (U.S. Census). As with many of the early settlers, the McGonigles established numerous timber claims by planting the fast-growing and drought-resistant eucalyptus trees which still dot the hillsides of the project area.

c) Record Search and Literature Review Results

The 1993 survey of the subarea was completed by Gallegos & Associates, resulting in complete coverage of the project area. As reported in the Gallegos document, prior to the 1993 survey, there were 43 archaeological sites and one isolated find recorded in the project area with the SCIC. The Gallegos survey provided information that 15 of the formerly recorded sites and the isolated find were not relocated within the property area. The survey did result in the discovery of an additional 13 sites and 9 isolated finds.

Table 4F-2 provides a summary of the sites and the status of these sites based on available information.

As noted above, 13 of the sites are mapped on the Del Mar Highlands project and were dealt with as part of the environmental review for that project (Norwood and Walker 1979). Among the remaining sites under consideration, 10 are recorded as habitation sites, 15 as lithic scatters, 8 as camps, 4 as historic locations, and 2 as shell middens. CA-SDI-6921 was found to be outside of the project property and is not evaluated here. Several buildings depicted on early maps were not located and were not part of this evaluation effort. A brief description of each of the sites under consideration is provided below. Sites marked with an asterisk were not relocated during the Gallegos survey but were investigated by RECON in order to verify the earlier findings. Sites marked with and asterisk were not relocated during the Gallegos survey of the project area.

CA-SDI-14002 (-6916, -6917)

CA-SDI-14002 is the trinomial that subsumes two previously recorded sites (CA-SDI-6916 and -6917). Richard Norwood recorded CA-SDI-6916 as a portion of a larger complex. During the 1979 field survey the site was noted as having been disturbed by agricultural activity, specifically tomatoes. Norwood and Walker (1979) noted the presence of an artifact scatter and midden soil at this location of CA-SDI-6916, the more westerly of the two areas. The surface scatter of materials included hammerstones, cores, flakes and shatter, scrapers, a blade, metates, manos, shell, and fire-affected rock.

The site visit in 1993 by Gallegos & Associates provides surface dimensions of 100 meters by 130 meters and reiterates the disturbance from agriculture, recent trash, and road grading. The surface artifacts noted in 1993 include 10 cores, 40 plus flakes, 1 mano fragment, 1 hammerstone, and 2 sandstone metate fragments. In addition, some fire-affected rock was noted and a light scatter of *Chione* sp. shell fragments.

At the time of the significance evaluation completed by RECON, the site area was still under cultivation. An intensive site surface survey was completed and artifacts were noted in the central area of the mapped site location. Testing was completed at this location.

CA-SDI-7205

This site, originally evaluated in 1979, was revisited in 1993 by archaeologists from Gallegos & Associates. At the time of the site update the surface items that were observed included "1 mano, 4 cores (porphyritic volcanic), 1 possible metate, and 5 volcanic flakes" and scattered fire-affected rock (Strudwick et al. 1993). The site had been disked a short time before the 1993 site visit. Disking had created a ground surface visibility of some 95 percent.

This site was revisited for significance evaluation by RECON archaeologists. The site was relocated from plotted site information provided by the Gallegos & Associates update. Fallow tomatoes and weeds generally obscured the site surface at the time of the significance evaluation. Dirt roads for maintaining and harvesting tomatoes were present and well maintained.

CA-SDI-13098

This site was one of the sites that was discovered during the Gallegos & Associates survey of the Pacific Highlands Ranch project area in 1993. The size of the site is given as 50 meters by 40 meters and consisted of a scatter of flaked and ground stone artifacts with some shell and fire-affected rock. The site was proposed to have some potential for a subsurface deposit because of the presence of darker soil and evidence of rodent activity.

The surface of the site was disked close to the time of the 1993 inspection making for excellent ground surface visibility. The site was also planted in tomatoes and evidence of agricultural activity was noticeable. This site was revisited by the RECON team and tested for significance.

CA-SDI-6697/H

This site is known as the Gonzalez Canyon adobe. The site represents a fine example of a resource that has been visited, recorded, and tracked for alteration and degradation, over a long period of time. There are site records for this location going back to early 1978 (Hatley and Neeper) with additional visits and recording updates in late 1978 (Norwood), 1984 (Cardenas and Winterrowd), 1986 (Peter), 1993 (Strudwick et al.), and 1998 (Cheever, Collett, and Whitehouse). The result of these numerous visits is a record of alteration and degradation of this location.

The most recent visit to the site location (Strudwick et al. 1993) provides a record of architectural degradation. The adobe walls are recorded at 50 centimeters in height with a wall segment of 2.5 meters being the only standing segment. The exotic trees and patch of cactus were present and the site surface demonstrated a light scatter of debris. A border of PVC pipe was placed around the adobe sometime between 1986 and 1993 and was interpreted as a protective buffer (Strudwick et al. 1993). Agricultural disturbance is noted on the 1993 update as the cause of substantial alteration to the areas surrounding the structure.

CA-SDI-6697/H was revisited by RECON in 1998 and found to be generally consistent with the findings of the 1993 survey. The site is located in the drainage and is outside the areas that have been designated for grading or development. A site update was completed and recommendations for management have been provided.

CA-SDI-13092

This is one of the sites that was discovered by the Gallegos & Associates crew during their survey of the project area. The site record for this site provides a site size of 60 meters by 30 meters with no noticeable deposit depth. The site surface survey yielded two cores and 4fourflakes of a quartzite raw material, leading the team to classify this location as a sparse lithic scatter.

RECON revisited this site in January 1998 and found two flakes and one core on the surface. The extent of the site was reevaluated at 30 meters by 15 meters and there was no evidence of a subsurface deposit. The location matches the description provided by the Gallegos team and was tested for significance by RECON.

CA-SDI-6913

Norwood and Walker originally recorded the site in 1979 as a light density lithic scatter with approximately 15 cores, 10 flakes, and 1 scraper. In addition to the artifact scatter, the recorders noted a "rock alignment" of an irregular but generally rectangular shape measuring 2.2 meters north/south by 1.17 meters east/west (Norwood and Walker 1979).

This site was revisited in 1993 by a team from Gallegos & Associates with a note that the rock feature was not noticeable. The surface artifacts include 7 cores and 40 flakes of volcanic and quartzite stone materials. The team also noted the presence of a well-worn foot trail and the presence of some fire-affected rock. The site area was relocated by RECON archaeologists in January 1998 and tested for significance.

CA-SDI-6914

This site was originally recorded by Norwood and Walker (1979), as a 20-by-20-meter area of dark, sandy clay with some fire-affected rock and two shell fragments. At the time of the original site recording the location was under cultivation in tomatoes.

The site location was revisited by archaeologists from Gallegos & Associates in 1993, who noted that the cultivation was ongoing. The surface survey revealed the presence of one core and one scraper from porphyritic volcanic stone. There was no shell noted on the surface during the 1993 update.

RECON archaeologists revisited this site in January 1998 and found one core and two shell fragments. The site is heavily disturbed from cultivation and the surface materials are sparse. A significance evaluation was completed at this location by RECON.

CA-SDI-13093

This site was recorded in 1993 during the Gallegos & Associates survey of the Pacific Highlands Ranch property. The site is categorized as a temporary habitation area. At the

time of the Gallegos survey the land was fallow; however, evidence of disking and staking was clear. A pedestrian survey of the site located "1 portable mano, 2 cores (quartzite and porphyritic-volcanic), 2 manos, 50+ flakes (1 quartz, 9 quartzite, 40 porphyritic-volcanic)," some fire-affected rock and 6 fragments of marine shell (3 gastropod and 3 *Chione* sp. fragments). The soil on-site was described as a sandy loam with some cobbles on a Plio-Pleistocene marine and non-marine surface.

It appears that this area has been used as cultivated land since the Gallegos survey. The alterations of the land surface from cultivation may have obscured or displaced the artifacts that were noted by the 1993 survey and site recording episode. RECON revisited this location and completed a significance assessment.

CA-SDI-6701*

This site was originally recorded by Richard Norwood as part of the San Dieguito Estates project. The original site record indicates that the site occupied an area of 32 meters by 42 meters and was a scatter of surface artifacts with midden soil. A dirt road hems the site on the north and some disking of site vegetation had occurred.

The site was revisited in 1993 by the Gallegos & Associates team. The location of this site was identified and found to be completely altered from the conditions that were reported in 1978. The survey conclusion was that this site no longer exists.

The site location was revisited by the RECON team in January 1998 with a conclusion that is consistent with the Gallegos survey finding. There is no evidence of an archaeological site at this location; however, every effort was made to identify and sample this resource area.

CA-SDI-6915*

The site area is presently under cultivation and was under cultivation during the original recording in 1979, by Richard Norwood. The area was described as a scatter of surface artifacts with apparent midden soil. The surface items that were inventoried on the site recorded on the site record form include 2 hammerstones, 5 core fragments, flakes and debitage, 5 scrapers, 1 blade, 1 metate fragment, 15 mano fragments, and fire-affected rock. An undetermined quantity of shell was noted and described as weathered and fragmented. Norwood (1979) also noted the collection of the blade, 1 core, and 3 manos from the site surface.

The location of this site was revisited by the Gallegos survey team in 1993 with a negative finding. The site area was consistently altered for agricultural production, between 1979 and 1993 and no evidence of cultural resource material was identified within the mapped site area.

RECON revisited the site location in 1998 and reinforced the finding by the Gallegos team that the site no longer exists. The artifacts from this site appear to have been displaced and potentially reburied by years of discing and planting. This site was determined to have been destroyed by land use activities.

CA-SDI-6920/H*

This site was recorded in 1979 by Richard Norwood as a scatter of historic-era trash. The represented period of deposit was estimated to be between 1890-1915.

This site location was revisited by the Gallegos team in 1993 and found to be part of the Springtime Growers nursery. There was no evidence of the site materials and the archaeological scatter or deposit was absent (Strudwick et al. 1993). The site location was revisited by RECON archaeologists in January 1998 with the same result. This site no longer exists.

CA-SDI-6919*

This small scatter of lithic artifacts was estimated to measure 30 meters by 20 meters and contain 1 mano, 10 flakes, 1 core, and fire-affected rock as well as a light scatter of scallop shell. The condition of this area in 1979 was poor with disturbance from agriculture, a dirt road, and a dirt trench.

This location was revisited by the Gallegos team and found to be part of the Springtime Growers nursery. The site location was covered with potted plants on a bulldozed surface capped with road gravel. There were no archaeological items noted in the vicinity of the mapped location of this site. The survey team concluded that this site had been destroyed by the plant nursery activities.

RECON archaeologists revisited this site location in January 1998 and confirmed the results of the Gallegos survey.

CA-SDI-10138*

The site was recorded in 1984 by Cathy Winterrowd as a small, light density lithic scatter with two loci of concentration. The materials noted at the two loci include flakes, cores, and a scraper. These items were described as metavolcanic and quartzite. The two loci were described as possible quarry areas.

This site was revisited by the Gallegos survey team in 1993. The site location demonstrated evidence of heavy equipment alteration and there were no artifacts identified on the surface of either loci. The site update form indicates that the site was not relocated and that it no longer exists.

RECON revisited this site location during the current work effort and found the damage and conditions to be consistent with the Gallegos finding. The site area appears to have been graded and there is no evidence of cultural material on the surface and no surviving materials or deposits are likely to occur given the amount of disturbance and the thin mantle of soil that exists on this landform.

CA-SDI-7201*

The site is recorded as a small, low-density lithic scatter composed of several pieces of debitage, three flakes, and two cores. The site location was revisited in 1993 by the Gallegos team. The site record update indicates that no cultural debris was found at the mapped site location and the site was believed to have been destroyed.

RECON revisited this location and no cultural resource debris was observed. The site as originally recorded was a light density lithic scatter and the amount of land alteration in the intervening appears to have eliminated all evidence of this resource. This site no longer exists.

CA-SDI-7203*

The site was recorded as a 15-by-15-meter scatter of several flakes and pieces of debitage and one core. The artifacts were found scattered in a wash and were proposed to have been displaced from erosion. This location was revisited by the Gallegos team in 1993 but the artifacts were not relocated. The finding for this site is that it no longer exists.

RECON revisited this site location and found the circumstances to be consistent with the conditions that were identified by the Gallegos team. The low number of items and the apparent placement of those items in an erosional context combined to create a high likelihood of continued displacement and eventual loss. This site no longer exists.

CA-SDI-6921*

This site was originally recorded in 1979 by Richard Norwood as a scatter of artifacts with two "pockets" of midden soil covering an area of approximately 70 by 40 meters. A number of surface items were noted including hammerstones, cores, ground stone tools, and flakes and debitage. The site was classified as a camp with items extending along the top of a small ridge.

The Gallegos survey team visited this site location in 1993. At the time of their survey, the site was described as destroyed by the Springtime Growers business enterprise. The nursery had created a potting area on the surface of this site and all evidence of the site was destroyed or obscured by the activities.

RECON revisited this site location during the current work effort with the same finding. This site has been destroyed by the current land use activity and no evidence of cultural material remains or is suspected.

Cultural Resource Issue

1. Would implementation of the Subarea Plan adversely affect archaeological or historical resources?

1) Issue

Would implementation of the Subarea Plan adversely affect archaeological or historical resources?

Impacts

Implementation of the Pacific Highlands Ranch plan would result in impacts to 11 cultural resource sites. This is the number of sites that are plotted within areas of proposed grading under Plan 1 and Plan 2 or alteration and for which prior determinations of significance/importance have not been made. Given the current conceptual grading design conservation through avoidance is accomplished for other 12 sites. Eight additional sites within the project area have previously been determined to be not significant/important and do not require any additional work. The remaining eight sites were not relocated by the Gallegos team. RECON has implemented a testing program to further document the research potential of the 11 sites, which will be impacted by the proposed project. This fieldwork is also intended to verify the destruction of the eight sites that were not relocated during the Gallegos survey. The particularly heavy and persistent winter rains have delayed the completion of testing at all of the sites under evaluation. The results of testing are provided in a technical document and summarized below.

Under the California Environmental Quality Act, Appendix K, Section 21083.2, an important archaeological resource is one which:

- Is associated with an event or person of recognized significance in California or American history or recognized scientific importance in prehistory;
- Can provide information which is both of demonstrable public interest and useful in addressing scientifically consequential and reasonable or archaeological research questions;

- Has a special or particular quality such as oldest, best example, largest, or last surviving example of its kind; and
- Is at least 100 years old and possesses substantial stratigraphic integrity or involves important research questions that historical research has shown can be answered only with archaeological methods.

Based on Ordinance Number 0-18456, adopted on January 12, 1998 amending the Resource Protection Ordinance "Significant prehistoric and historic sites and resources are locations of prehistoric or historic resources that possess unique cultural, scientific, religious, or ethnic value of local, regional, state, or federal importance. The above shall be limited to prehistoric or historic districts, sites, buildings, structures, or objects included in the State Landmark Register, or the City of San Diego Historical Sites Board List, or included in or eligible for inclusion in the National Register of Historic Places, areas of past human occupation where important prehistoric or historic activities or events occurred (such as villages or permanent camps); and locations of past or current traditional religious or ceremonial observances...."

Cultural resource guidelines for the City of San Diego guidelines outline specific measures for completing testing to document site importance through the documentation and evaluation of both surface and subsurface components of the cultural resource area. Complete or partial site evaluations have been completed by RECON at each of the 11 sites under consideration. The findings from this work are presented below with summaries of the work previously completed at the remaining sites.

Each of the 11 sites identified within the area of proposed development, which have not previously been subjected to significance evaluation, were revisited by RECON as part of the current work effort. The results of those visits are provided below on a site-by-site basis.

Based on previously completed testing, cultural resource sites CA-SDI-6912, -13,096, -14,003, and -14,562 have been found to be important/significant sites. Data recovery for CA-SDI-6912, -13,096, -14,003, and -14,562 has been included as a mitigation measure for these important sites in the SR-56 EIR. As shown on Table 4F-2, sites CA-SDI-6912, Loci B and E; -13,096; -14,003; and -14,562 have been determined to be potentially eligible for nomination to the National Register and may also qualify as RPO significant resource areas. The proposed project designs under Plan 1 and Plan 2 would result in impacts to these sites during mass grading. If significant impacts occur at these sites during grading the mitigation measures discussed below would be the obligation of the property owner(s) to fulfill. Should impacts to these sites occur as a result of the construction of SR-56, the completion of mitigation measures will be the responsibility of Caltrans. In the event that these sites are found to be significant under RPO, preservation/protection is the identified approach.

As stated in the SR-56 EIR, impacts to these sites will be mitigated through the implementation of a data recovery plan guided by a research design that identifies the areas of research interest, context, and the data that needs to be collected and the methods of data collection. The anticipated data recovery sampling for these sites is the completion of additional excavation at a level to be determined in a site-specific research design. Sampling at these sites most likely would be completed in 5 percent phases up to a total of 15 percent to extract data for testing research questions of chronology, subsistence, settlement, and cultural interaction. Sampling should include excavation of standard one-meter units as individual probes and in block arrangements with the use of mechanical trenching and eventually controlled site destruction.

CA-SDI-14002 (-6916, -6917)

This composite site area was relocated by RECON and is in an active agricultural field. All of the shovel test pits that were completed at this site were negative for subsurface materials and a surface collection was completed. The remaining site materials appear to be concentrated in a smaller area and may have a subsurface distribution; however, the soil in this area is not particularly deep and there has been a considerable amount of disturbance to this site area.

A point provenience surface collection was completed at this site with the recovery of 2 cores, 10 scrapers, 2 hammerstones, 2 utilized flakes, 1 modified flake, 1 mano, 4 basin fragments, 1 bifacial thinning flake, 3 cortex removal flakes, 26 core reduction flakes, 7 finishing flakes, 2 pieces of primary shatter, and 3 pieces of secondary shatter. Two sample units will be completed at this site to assess the possibility of a subsurface deposit; however, based on the results of the shovel test pits and the relatively small number of surface artifacts over the large site area, the potential for site significance is low.

CA-SDI-13098

This site was relocated and a significance evaluation was completed. An intensive pedestrian survey was completed during which six surface items were located, plotted on the site map, and collected. The surface survey was followed by the excavation of nine shovel test pits which were positioned along cardinal headings at 10-meter intervals. There were no artifacts or ecofacts recovered from the shovel test pits and none are expected at this site. Based on the condition of this location and the small number of artifacts, this site has been determined not to be significant.

This site was relocated and a single core and two pieces of marine shell were identified on the site surface. At the time of the significance evaluation this site was planted with tomatoes and ground surface visibility was fair but disturbance was extensive. These findings are generally consistent with the 1993 survey, which noted two shell fragments, a core, and a scraper. This appears to be a highly disturbed, low-density camp location

which is absent of a quantity, quality, or variety of artifacts and ecofacts as the basis for completing meaningful research.

CA-SDI-13092

This site is bounded on all sides by scraped and tilled land, although the site surface appears to be in relatively good condition. Two flakes and one core were identified on the site surface during the RECON field effort, which is similar to the findings in 1993. This site has degraded over time and the available information appears to be limited. At present it appears that this is a site of limited potential with a small number and nondiagnostic collection of artifacts. Soil formation at this location is generally poor and the likelihood of subsurface materials is low. Sample units will be completed as soon as weather conditions allow. (Significance assessment to be determined upon completion of sample units.)

CA-SDI-13093

This site has been virtually destroyed by agriculture-related grading. The location of the site is scraped and soil has been pushed and redeposited both on and around the mapped site location. There was no evidence of this site found during the RECON site visit and none is expected. Extensive pedestrian survey of the site area failed to yield any evidence of cultural debris. The present conditions and absence of archaeological evidence combine for a finding that this site is not significant.

CA-SDI-6697/H

This is the location of the Gonzalez Canyon adobe. The condition of this site has degraded consistently since the first site record dating to 1979. The house has weathered and the surrounding features and landscape elements have been altered. The location is within a major drainage and as such the location is protected from direct impacts from the proposed development of this project. The location is significant as one of the few surviving examples of the rural pattern of settlement in the project area during the late 1800s and into the early 1900s. The location should be protected and archival and field research should be conducted to provide additional background on this location.

CA-SDI-6913

This site was relocated in 1993 by the Gallegos survey team and 7 cores and somewhat more than 40 flakes were identified. The location was revisited by RECON in 1998 and found to be completely covered in a dense growth of scrub vegetation. Based on the conditions at this site and the proposed limits of grading, evaluation through excavation was not completed. This site is considered to be potentially significant.

CA-SDI-6914

The site was revisited by the Gallegos team in 1993 who noted the site was under cultivation. The team noted one core, one scraper, and no other surface materials. RECON archaeologists revisited the site in 1998 and found one core and two shell fragments. The site is heavily disturbed from cultivation and a significance evaluation is being completed.

CA-SDI-6915

This site was not located by the Gallegos team in 1993 and was not identified by RECON in 1998. This site has been destroyed by agriculture and there are no indications that any materials are present or that if they were present would provide any scientifically meaningful data. This site was determined to be not significant.

CA-SDI-6919

The location of this site was identified within an active plant nursery in 1993 and remains so today. There was no evidence of the site identified in 1993 and that has not changed in the intervening years. This site no longer exists and is not significant.

CA-SDI-6701

This site was not relocated in 1993 with evidence that the ridge on which the site was recorded had been destroyed by grading associated with the development of a residential community to the west. There was no evidence of this site noted in 1998 and the site has been determined as destroyed. This resource area has been determined to be not significant.

CA-SDI-6921

This site was recorded in 1979 as a lithic scatter. The 1993 survey effort did not produce evidence that this site exists and stated that the site had been destroyed. RECON revisited this site in 1998 and found that the resource area no longer exists and, as such, is not a significant resource area.

Significance of Impacts

Twenty-four sites have been found not significant, six sites are in open space areas and should be indexed prior to recording tentative maps for future projects, two sites are in open space and may be potentially significant and require additional evaluation, and one site is located outside of the project boundaries and will require some evaluation when a project is proposed for this property.

The resulting loss of all of the sites on this project is considered a significant cumulative loss of cultural resource information. The destruction of a number of these sites prior to indexing or testing of any kind constitutes a significant impact as important information, which may have been present in these sites, has been lost without record.

There are four sites (CA-SDI-6912, loci B&E, -13,096, 14,003, and -14,562) which have been found to be important/significant resource areas; therefore, impacts to these sites would be considered significant. As presently designed, all of these sites will be destroyed by construction grading. Mitigation of impacts to these sites can be accomplished if they are not found to be significant under the City of San Diego's Resource Protection Ordinance. The current findings for these sites are that they are potentially eligible for nomination to the National Register and are significant under criteria of CEQA. A finding of National Register importance would be viewed as meeting one of the criteria of RPO importance. The State Historic Preservation Officer (SHPO) has not made a finding on the eligibility of these sites as yet. Destruction of a site that is considered to be important under RPO would constitute a significant unmitigated impact. In the event that federal money or federal actions are elements of project development, sites within the project area would be evaluated under Section 106.

Mitigation, Monitoring, and Reporting

Mitigation, monitoring, and reporting steps are a requirement for any site that is found to be significant and where direct or indirect project impacts cannot be avoided. The devising of a project impact mitigation plan is uniquely tied to the particular resource under consideration. The preferred alternative for any significant or important resource area is avoidance. In the event that avoidance is not feasible, some type of impact mitigation must be completed. The level of work is dependent upon the nature, size, and content of the cultural resource site and upon the types of research that can be accomplished through the recovery and analysis of data from the site. Table 4F-2 provides a summary of the findings for the sites in the project area.

Resource sites CA-SDI-13091, CA-SDI-13095, CA-SDI-13097, CA-SDI-13099, CA-SDI-13101H, CA-SDI-14001H, CA-SDI-7202, CA-SDI-7204, and CA-SDI-6697/H are avoided by the present construction grading design which places these sites in open space. As specific project plans are proposed some level of site assessment would be required. In the event that these sites will remain in open space the minimal treatment would be the completion of a site indexing which would provide a baseline of information on the deposit content. Indexing would involve the excavation of a minimum of two sample units and a report of findings with updated site record information and recommendations for permanent preservation.

Testing and survey reconnaissance indicate that CA-SDI-13093, CA-SDI-13098, CA-SDI-6914, and CA-SDI-7205 do not contain meaningful information and that additional sampling will not provide the scientific community or public with previously unknown information regarding the prehistoric past. No further work is recommended for these sites.

CA-SDI-14002 (-6916, -6917), CA-SDI-13092, and CA-SDI-6913 are considered potentially significant until fieldwork can be completed to assess their condition and data content. This work is presently being accomplished.

Eight recorded sites were not relocated because they no longer exist. These sites do not require any additional investigation. These sites include CA-SDI-10138, CA-SDI-6701, CA-SDI-6915, CA-SDI-6919, CA-SDI-6920H, CA-SDI-6921, CA-SDI-7201, and CA-SDI-7203. An additional eight sites within the Pacific Highlands Ranch project area were found to not require any additional investigation as they have previously been determined to be nonsignificant resource areas. These include CA-SDI-10221, CA-SDI-13099, CA-SDI-6696, CA-SDI-6698, CA-SDI-6700, CA-SDI-6911, CA-SDI-6918, and CA-SDI-7206.

Archaeological collections will be stored at an appropriate curatorial facility.

G. Air Quality

Existing Conditions

a) Climate

The project area, like the rest of San Diego County's coastal areas, has a cool, semiarid steppe climate characterized by warm, dry summers and mild, wet winters. The dominating permanent meteorological feature affecting the region is the Pacific High Pressure Zone, which produces the prevailing westerly to northwesterly winds. The study area has a mean annual temperature of 62 degrees Fahrenheit (F) and an average annual precipitation of 10 inches, falling primarily from November to March. Winter low temperatures at the site average about 45 degrees F, and summer high temperatures average about 75 degrees F (U.S. Department of Commerce 1992; Pryde 1976).

Prevailing conditions along the coast are modified by the daily sea breeze/land breeze cycle. Fluctuations in the strength and pattern of winds from the Pacific High Pressure Zone interacting with the daily local cycle produce periodic temperature inversions that influence the dispersal or containment of air pollutants in the San Diego Air Basin (SDAB). The afternoon temperature inversion height, beneath which pollutants are trapped, varies between 1,500 and 2,500 feet MSL. The altitude beneath the inversion layer is the mixing depth for trapped pollutants. In winter, the morning inversion layer is about 800 feet MSL, or about 425 feet above the project site. In summer, the morning inversion layer is about 1,100 feet MSL. A greater change between morning and afternoon mixing depth increases the ability of the atmosphere to disperse pollutants. Generally, therefore, air quality at the site is better in winter than in summer.

The predominant pattern is sometimes interrupted by the so-called Santa Ana conditions, when high pressure over the Nevada-Utah area overcomes the prevailing westerlies, sending strong, steady, hot, dry northeasterly winds over the mountains and out to sea. Strong Santa Anas tend to blow pollutants out over the ocean, producing clear days. However, at the onset or breakdown of these conditions, or if the Santa Ana is weak, air quality may be adversely affected. In these cases, emissions from the South Coast Air Basin to the north are blown out over the ocean, and low pressure over Baja California draws this pollutant-laden air mass southward. As the high pressure weakens, prevailing northwesterlies reassert themselves and send this cloud of contamination ashore in the SDAB. There is a potential for such an occurrence about 45 days of the year, but San Diego is adversely affected on only about 5 of them. When this impact does occur, the combination of transported and locally produced contaminants produces the worst air quality measurements recorded in the basin.

b) Regulatory Framework

Federal Regulations

The federal Clean Air Act was enacted in 1970 and amended in 1977 and 1990 [42 U.S.C. 7506(c)] for the purposes of protecting and enhancing the quality of the nation's air resources to benefit public health, welfare, and productivity.

In 1971, in order to achieve the purposes of Section 109 of the act, the Environmental Protection Agency (EPA) developed primary and secondary national ambient air quality standards (NAAQS). Six pollutants of primary concern were designated: ozone, carbon monoxide, sulfur dioxide, nitrogen dioxide, lead, and suspended particulates (PM-10). The primary NAAQS must, "allowing an adequate margin of safety," "protect the public health" and the secondary standards must "protect the public welfare from any known or anticipated adverse effects" (1990 Clean Air Act, Section 109). "Public welfare" includes tangible and intangible things such as aesthetics, agriculture, and architecture. The primary standards were established, with a margin of safety, considering long-term exposures for the most sensitive groups in the general population (i.e., children, senior citizens, and people with breathing difficulties).

If an air basin is not in federal attainment for a particular pollutant, the basin is classified as marginal, moderate, serious, severe, or extreme. Additionally, under San Diego's current federal classification as a serious nonattainment area for ozone, the Clean Air Act specifies several requirements, including (County of San Diego 1995):

- Federal ozone standard attainment by 1999 and a demonstration that the State Implementation Plan provides for attainment.
- Emissions reduced 15 percent between 1990 and 1996 and reduced 3 percent each year thereafter until attainment.
- Transportation control measures if vehicle travel and emissions exceed attainment demonstration levels.

The EPA allows the states the option to develop different (stricter) standards, which California has adopted. Table 4G-1 lists the federal and California state standards.

State Regulations

As discussed above, the State of California has set more stringent limits on the six pollutants of national concern (see Table 4G-1).

Assembly Bill (AB) 2595 became effective on January 1, 1989, and requires that districts implement regulations to reduce emissions from mobile sources through the adoption and

**TABLE 4G-1
AMBIENT AIR QUALITY STANDARDS**

Pollutant	Maximum Concentration Averaged over Specified Time Period	
	State Standard	Federal Standard
Oxidant (ozone)	0.09 ppm (180 $\mu\text{g}/\text{m}^3$) 1 hr.	0.12 ppm (235 $\mu\text{g}/\text{m}^3$) 1 hr.
Carbon monoxide	9.0 ppm (10 mg/m^3) 8 hr.	9 ppm (10 mg/m^3) 8 hr.
Carbon monoxide	20.0 ppm (23 mg/m^3) 1 hr.	35.0 ppm (40 mg/m^3) 1 hr.
Nitrogen dioxide	0.25 ppm (470 $\mu\text{g}/\text{m}^3$) 1 hr.	0.053 ppm (100 $\mu\text{g}/\text{m}^3$) Annual Average
Sulfur dioxide	0.25 ppm (655 $\mu\text{g}/\text{m}^3$) 1 hr.	0.03 ppm (80 $\mu\text{g}/\text{m}^3$) Annual Average
Sulfur dioxide	0.04 ppm (105 $\mu\text{g}/\text{m}^3$) 24 hr.	0.14 ppm (365 $\mu\text{g}/\text{m}^3$) 24 hr.
Suspended particulate matter (PM-10)	50 $\mu\text{g}/\text{m}^3$ 24 hr.	150 $\mu\text{g}/\text{m}^3$ 24 hr.
Suspended particulate matter (PM-10)	30 $\mu\text{g}/\text{m}^3$ Annual Geometric Mean	50 $\mu\text{g}/\text{m}^3$ Annual Arithmetic Mean
Lead	1.5 $\mu\text{g}/\text{m}^3$ 30-day Average	1.5 $\mu\text{g}/\text{m}^3$ Calendar Quarter

SOURCE: State of California 1996.

ppm = parts per million; $\mu\text{g}/\text{m}^3$ = micrograms per cubic meter.

enforcement of transportation control measures. As a state serious ozone nonattainment area, San Diego is subject to various requirements including (County of San Diego 1995):

- Five percent annual reduction in hydrocarbons and oxides of nitrogen emissions from 1987 until standards are attained. If this five percent reduction cannot be obtained, every feasible measure must be implemented.
- Transportation control measures to achieve an average of 1.4 persons per passenger vehicle during weekday commute hours by 1999 or programs providing equivalent emission reductions not otherwise required.

State Implementation Plan

The State Implementation Plan (SIP) is the document which sets forth the state's strategies for achieving air quality standards. The San Diego Air Pollution Control District (APCD) is responsible for preparing and implementing the portion of the SIP applicable to the SDAB. The San Diego APCD adopts rules, regulations, and programs to attain state and federal air quality standards and appropriates money (including permit fees) to achieve these objectives.

California Environmental Quality Act

Section 15125(b) of the CEQA Guidelines contains specific reference to the need to evaluate any inconsistencies between the proposed project and applicable general plans and regional plans. Regional plans include the applicable air quality management plan, which is the Regional Air Quality Strategy (RAQS) in the San Diego Air Basin.

Local Regulations

The San Diego APCD is the agency that regulates air quality in the SDAB. The APCD prepared the 1991/1992 RAQS in response to the requirements set forth in AB 2595. The draft was adopted, with amendments, on June 30, 1992 (County of San Diego 1992). Attached as part of the RAQS are the transportation control measures (TCM) for the air quality plan prepared by the San Diego Association of Governments (SANDAG) in accordance with AB 2595 and adopted by SANDAG on March 27, 1992, as Resolution Number 92-49 and Addendum. The required triennial update of the RAQS and corresponding TCM were adopted on December 12, 1995. The RAQS and TCM Plan set forth the steps needed to accomplish attainment of state and federal ambient air quality standards.

The APCD has also established a set of Rules and Regulations initially adopted on January 1, 1969, and periodically reviewed and updated. The Rules and Regulations define requirements regarding stationary sources of air pollutants and fugitive dust.

c) Existing Air Quality

The project area is within the SDAB. Air quality at a particular location is a function of the kinds and amounts of pollutants being emitted into the air locally and throughout the basin, and the dispersal rates of pollutants within the region. The major factors affecting pollutant dispersion are wind speed and direction, the vertical dispersion of pollutants (which is affected by inversions), and the local topography.

Air quality is commonly expressed as the number of days in which air pollution levels exceed state and federal standards, as set by the California Air Resources Board (CARB) and the EPA, respectively (see Table 4G-1). The concentration of pollutants within the SDAB is measured at 10 stations maintained by the San Diego APCD and the CARB. The station nearest the project measuring a full range of pollutants (except for lead) is in Kearny Mesa, southeast of the project site. Ozone levels are also measured at a station in Del Mar. The nearest station that has monitored particulates (PM-10) for the entire period from 1991 to 1995 is the Oceanside-Mission Avenue monitoring station. Although none of these stations monitors lead concentrations, lead levels measured at other monitoring stations in the SDAB are well below both federal and state standards.

Table 4G-2 summarizes the number of days annually from 1991 to 1995 during which state and federal standards were exceeded in the SDAB overall, while Table 4G-3 lists these data for the Kearny Mesa, Del Mar, and Oceanside monitoring stations.

Ozone

The air basin is currently designated a state "serious" nonattainment area and a federal "serious" nonattainment area for ozone. Peak ozone concentrations have steadily declined since 1978 (as reported by SANDAG's 1994 Regional Transportation Plan). In 1994, San Diego exceeded the state standard for ozone on 79 days compared with 158 in 1989. Federal standards were exceeded on 9 days compared with 55 days in 1989 (County of San Diego 1995). Of the nine monitoring stations in the SDAB which monitor ozone, only the mountain slopes station at Alpine exceeded the federal air quality standard for ozone in 1994. This was the first time that just a single station has exceeded federal standards since air quality monitoring began in 1955 (County of San Diego 1995). However, the federal standard was exceeded at six of the monitoring stations during 1995.

Table 4G-2 shows that in 1993, 1994, and 1995, the federal ozone standard was exceeded on 14, 9, and 12 days, respectively. During these years, the state ozone standard was exceeded on 89, 79, and 96 days, respectively. The federal standard for ozone was not exceeded during 1995 at the Kearny Mesa and Del Mar monitoring stations. However, the state standard for ozone was exceeded on 8 and 12 days during the same year at these stations, respectively.

**TABLE 4G-2
SUMMARY OF AIR QUALITY DATA
FOR THE SAN DIEGO AIR BASIN**

Pollutant	Number of Days Over Standard									
	State					Federal				
	1991	1992	1993	1994	1995	1991	1992	1993	1994	1995
Ozone (O ₃) - 1 hour	106	97	89	79	96	27	19	14	9	12
Carbon monoxide (CO) - 8 hour	0	0	0	0	0	0	0	0	0	0
Carbon monoxide (CO) - 1 hour	0	0	0	0	0	0	0	0	0	0
Nitrogen dioxide (NO ₂) - State 1 hour; Federal annual avg.	0	0	0	0	0	NE	NE	NE	NE	NE
Sulfur dioxide (SO ₂) State 1 hour; Federal annual average	0	0	0	0	0	NE	NE	NE	NE	NE
Particulates* (PM-10) - 24 hour	20/83	7/75	14/76	25/87	23/88	0/83	0/75	0/76	0/87	0/88
Lead (Pb) - State 30-day average; Federal calendar quarter	NE	NE	NE	NE	NE	NE	NE	NE	NE	NE

SOURCE: State of California 1992, 1993b, 1994, 1995, 1996.

*Number of samples over standard/number of samples collected.

NE: standard not exceeded.

TABLE 4G-3
NUMBER OF DAYS AIR QUALITY STANDARDS WERE EXCEEDED
AT KEARNY MESA, OCEANSIDE, AND DEL MAR MONITORING STATIONS

Pollutant	Year				
	1991	1992	1993	1994	1995
<u>Kearny Mesa Station</u>					
Ozone					
Federal 1-hour standard (0.12 ppm, 235 µg/m ³)	8	6	3	0	0
State 1-hour standard (0.09 ppm, 180 µg/m ³)	25	15	15	2	8
Carbon Monoxide					
Federal 8-hour average (9 ppm, 10 mg/m ³)	0	0	0	0	0
State 8-hour average (9.0 ppm, 10 mg/m ³)	0	0	0	0	0
State 1-hour average (20 ppm, 23 mg/m ³)	0	0	0	0	0
Nitrogen Dioxide					
Federal annual average (0.053 ppm, 100 µg/m ³)§	0.027	0.024	0.023	0.024	0.024
State 1-hour standard (0.25 ppm, 470 µg/m ³)	0	0	0	0	0
Sulfur Dioxide					
Federal annual average (0.03 ppm, 80 µg/m ³)§	0.002	0.004	0.002*†	NR	NR
State 1-hour average (0.25 ppm, 655 µg/m ³)	0	0	0†	NR	NR
State 24-hour average (0.04 ppm, 105 µg/m ³)	0	0	0†	NR	NR
Suspended 10-Micron Particulate Matter (PM-10)					
Federal 24-hour average (150 µg/m ³)‡	NR	NR	0/16	0/57	0/55
Federal annual arithmetic mean (50 µg/m ³)§	NR	NR	32.6*	30.0*	32.2*
State 24-hour average (50 µg/m ³)‡	NR	NR	3/16	1/57	6/55
State annual geometric mean (30 µg/m ³)§	NR	NR	27.1*	28.1*	27.5*
<u>Oceanside Station</u>					
Suspended 10-Micron Particulate Matter (PM-10)					
Federal 24-hour average (150 µg/m ³)‡	0/60	0/57	0/61	0/63	0/59
Federal annual arithmetic mean (50 µg/m ³)§	36.8*	29.1*	28.9	29.1	29.7
State 24-hour average (50 µg/m ³)‡	9/60	0/57	2/61	3/63	4/59
State annual geometric mean (30 µg/m ³)§	34.0*	27.8*	26.4	27.2	27.0
<u>Del Mar Station</u>					
Ozone					
Federal 1-hour standard (0.12 ppm, 235 µg/m ³)	7	3	3	0	0
State 1-hour standard (0.09 ppm, 180 µg/m ³)	28	19	19	4	12

SOURCE: State of California 1992, 1993b, 1994, 1995, 1996.

ppm - parts per million

mg/m³ - milligrams per cubic meter

µg /m³ - micrograms per cubic meter

NR - not reported at this station

*Data presented are valid, but incomplete in that an insufficient number of valid data points were collected to meet EPA and/or CARB criteria for representativeness.

†Monitoring of this pollutant was discontinued during 1993.

‡Number of samples over standard/number of samples collected.

§Data shown are in µg/m³.

Ozone presents special control strategy difficulties in the SDAB because of climatological and meteorological factors. Ozone is the end product of a chain of chemical reactions that produces photochemical smog from hydrocarbon emissions. A major source of hydrocarbon emissions is motor vehicle exhausts. In the SDAB, only part of the ozone contamination is derived from local sources; under certain conditions, contaminants from the South Coast Air Basin (such as the Los Angeles area) are windborne over the ocean into the SDAB. When this happens, the combination of local and transported pollutants produces the highest ozone levels measured in the basin.

In 1992, pollution transported from the Greater Los Angeles area was responsible for 11 out of 19 days over federal standards. On average, approximately 42 percent of the days over state standards since 1987 were attributable to pollution transported from Los Angeles (SANDAG 1994:249-250). Although during 1994 ozone concentrations in San Diego County exceeded the federal ozone air quality standard on nine days, on only two of those days was the peak ozone concentration attributed primarily to emission sources within San Diego County. On the other seven days, ozone transported into San Diego from the South Coast Air Basin was a significant factor (County of San Diego 1995).

Local agencies can control neither the source nor the transportation of pollutants from outside the basin. The APCD's policy, therefore, has been to control local sources effectively enough to reduce locally produced contamination to clean air standards. The 1994 Regional Transportation Plan concludes that ozone remains the major primary pollutant in the San Diego region.

Carbon Monoxide

No violations of the state standard have been recorded for carbon monoxide since 1991 and the basin is classified as a state attainment area for carbon monoxide. The basin currently is classified as a federal nonattainment area for carbon monoxide; however, no violations of the federal standard have been recorded since 1989. The APCD plans to apply to the EPA for reclassification of the basin to a federal attainment area for carbon monoxide, but has not initiated the process (County of San Diego 1997). Moreover, it should be noted that the state standard for carbon monoxide is more stringent than the federal standard.

Particulates (PM-10)

Particulates within the respirable range (10 microns in size or less) are reported as both an annual average and a 24-hour average. The basin overall is currently in attainment of the federal standard, although the basin is unclassified for inhalable particulates (County of San Diego 1995). However, the basin has not met the more stringent state standard. For several reasons hinging on the area's dry climate and coastal location, the SDAB has special difficulty in developing adequate tactics to meet present state particulate standards.

Nitrogen Dioxide, Sulfur Dioxide, and Lead

The basin is in attainment for these pollutants.

d) Standards and Criteria

California Air Resources Board Guidelines

For long-term emissions, the direct impacts of a project can be measured by the degree to which the project is consistent with regional plans to improve and maintain air quality. The regional plan for San Diego is the 1991/1992 RAQS and attached TCM Plan, as revised by the triennial update adopted on December 12, 1995. The CARB provides criteria for determining whether a project conforms with the RAQS (State of California 1989), which include the following:

1. Is a regional air quality plan being implemented in the project area?
2. Is the project consistent with the growth assumptions in the regional air quality plan?
3. Does the project incorporate all feasible and available air quality control measures?

City of San Diego

The City of San Diego's Significance Determination Guidelines (1993) provide several criteria for determining significant air quality impacts based on projected ADT and roadway levels of service.

1. In areas where traffic flow is not generally below LOS C and development is not located within 1,000 feet of a congested freeway, significant cumulative air quality impacts would occur from construction of multi-family units or commercial development generating more than 9,300 ADT or from construction of 930 single-family units (City of San Diego 1993).
2. In densely urbanized areas where there is traffic congestion or where development is located near congested freeways, significant cumulative air quality impacts would occur from construction of multi-family units or commercial development generating more than 6,500 ADT or from construction of 650 single-family units (City of San Diego 1993).

Additionally, local air quality impacts can also occur if traffic generated in the project area were to result in inadequate traffic flow. Substandard levels of service (below LOS D) create additional delays at the intersections which result in longer idling times for vehicles. Under the City's Significance Determination Guidelines, development which would cause the level of service on a six-lane prime arterial to degrade from LOS A, B, or C to LOS E or F or to degrade from LOS D to LOS F would result in a significant air quality impact. Significant air quality impacts would also occur if development caused

levels of service on four-lane prime arterials and major roads to degrade to LOS F (City of San Diego 1993).

Air Quality Issue

1. Would implementation of the Pacific Highlands Ranch Plan affect the ability of the County to meet the federal clean air standards according to the Regional Air Quality Strategy?

1) Issue

Would implementation of the Pacific Highlands Ranch Plan affect the ability of the County to meet the federal clean air standards according to the Regional Air Quality Strategy?

Impacts

a) Construction Emissions

During construction, temporary emissions would be generated by construction equipment used to build the proposed project. Grading would disturb surface soils and cause a discharge of particulates into the air. Dust control during grading operations would be regulated in accordance with the rules of the San Diego APCD and the regulations of the City of San Diego Land Development Ordinance. All project construction is required to include the following measures to reduce fugitive dust impacts:

1. All unpaved construction areas shall be sprinkled with water or other acceptable San Diego APCD dust control agents during dust-generating activities to reduce dust emissions. Additional watering or acceptable APCD dust control agents shall be applied during dry weather or windy days until dust emissions are not visible.
2. Trucks hauling dirt and debris shall be covered to reduce windblown dust and spills.
3. On dry days, dirt or debris spilled onto paved surfaces shall be swept up immediately to reduce resuspension of particulate matter caused by vehicle movement. Approach routes to construction sites shall be cleaned daily of construction-related dirt in dry weather.
4. On-site stockpiles of excavated material shall be covered or watered.

Additionally, construction would be a one-time, short-term activity.

b) Developed Condition Emissions

The primary air quality impacts which would occur from the future development of the proposed project area would be air pollutant emissions from automobile and truck traffic to and from the development. Additional local emissions would result from the burning of natural gas for space and water heating, fireplace emissions, and basinwide emissions from power plants generating electricity for use in the development.

The proposed project site is in the city of San Diego, which is within the San Diego Air Basin. The 1991/1992 RAQS, as updated in 1995, will be implemented by APCD throughout the air basin. Therefore, the proposed project fulfills the first criteria from the CARB guidelines described in Existing Conditions.

Normally, if a project is consistent with the City's General Plan or community plan, it can be considered consistent with the growth assumptions in the RAQS (State of California 1989). The proposed Pacific Highlands Ranch Plan project would generally comply with the land use goals, objectives, and recommendations of the Progress Guide and General Plan, the Framework Plan, and City Council Policies 600-29 and 600-30. Furthermore, the proposed project would dedicate open space land consistent with the Framework Plan Environmental Tier. Therefore, it can be concluded that the proposed project is consistent with the growth assumptions in the RAQS.

However, the proposed project would develop up to 4,97440 residential units which exceeds the City's thresholds for significant cumulative air quality impacts. Cumulative air quality impacts are discussed in Chapter 6 of this EIR.

c) Forecasted Traffic Conditions

Mobile sources (motor vehicles) account for a large portion of the current emissions of carbon monoxide, nitrogen oxides, and volatile organic gases in the San Diego Air Basin. Localized elevated levels of pollutants above the air basin's ambient conditions can occur adjacent to roadways if the roadways' levels of service are substandard, resulting in slower traffic, stop-and-go traffic, and increased delays at intersections. A degraded LOS would cause individual cars to emit more pollutants for a longer period of time as they travel through an area.

As discussed in the Traffic Circulation section of this EIR, all roadways and intersections within the Pacific Highlands Ranch project area are projected to operate at LOS D or better. Although off-site roadway segments and intersections are projected to operate at LOS E or F in the future, these reduced levels of service are the result of non-Pacific Highlands Ranch developments.

Significance of Impacts

a) Construction Emissions

Dust control during grading operations would be regulated in accordance with the rules of the San Diego APCD and the regulations of the City of San Diego Land Development Ordinance. Additionally, construction would be phased and construction of each phase would be a one-time, short-term activity, air quality impacts due to construction of the proposed project would not be significant.

b) Developed Condition Emissions

The proposed project would be consistent with the RAQS and would not create direct traffic impacts to the surrounding street system provided that the recommended road improvements are constructed. Therefore, direct air quality impacts would not occur if the proposed project were implemented.

The proposed project would result in significant cumulative air quality impacts under the City's significance thresholds as discussed in Chapter 6 of this EIR.

c) Forecasted Traffic Conditions

Development of the proposed project would not directly result in roadway or intersection levels of service below D. Therefore, no significant direct air quality impacts are anticipated. Cumulative air quality impacts would be significant.

Mitigation, Monitoring, and Reporting

No significant direct air quality impacts would be anticipated with approval of the proposed project. No mitigation is available for cumulative air quality impacts at the project level. The project's contribution to cumulative air quality impacts is discussed in Chapter 6, Cumulative Effects. The No Project alternative would avoid potential significant air quality impacts

H. Geology/Soils/Erosion

A geotechnical feasibility study (Pacific Soils Engineering, Inc. 1984) and a geologic reconnaissance report (Pacific Soils Engineering, Inc. 1989) were prepared for large portions of the proposed project site. More recently, a preliminary geologic and geotechnical report (Converse Consultants West 1993) has been prepared for the entire Pacific Highlands Ranch. In addition to these documents, the Black Mountain Ranch North and South Final EIR (City of San Diego 1992b) and the NCFUA Framework Plan EIR (City of San Diego 1992b) have addressed geology and soils for the project region. The following text includes findings and conclusions from these reports.

Existing Conditions

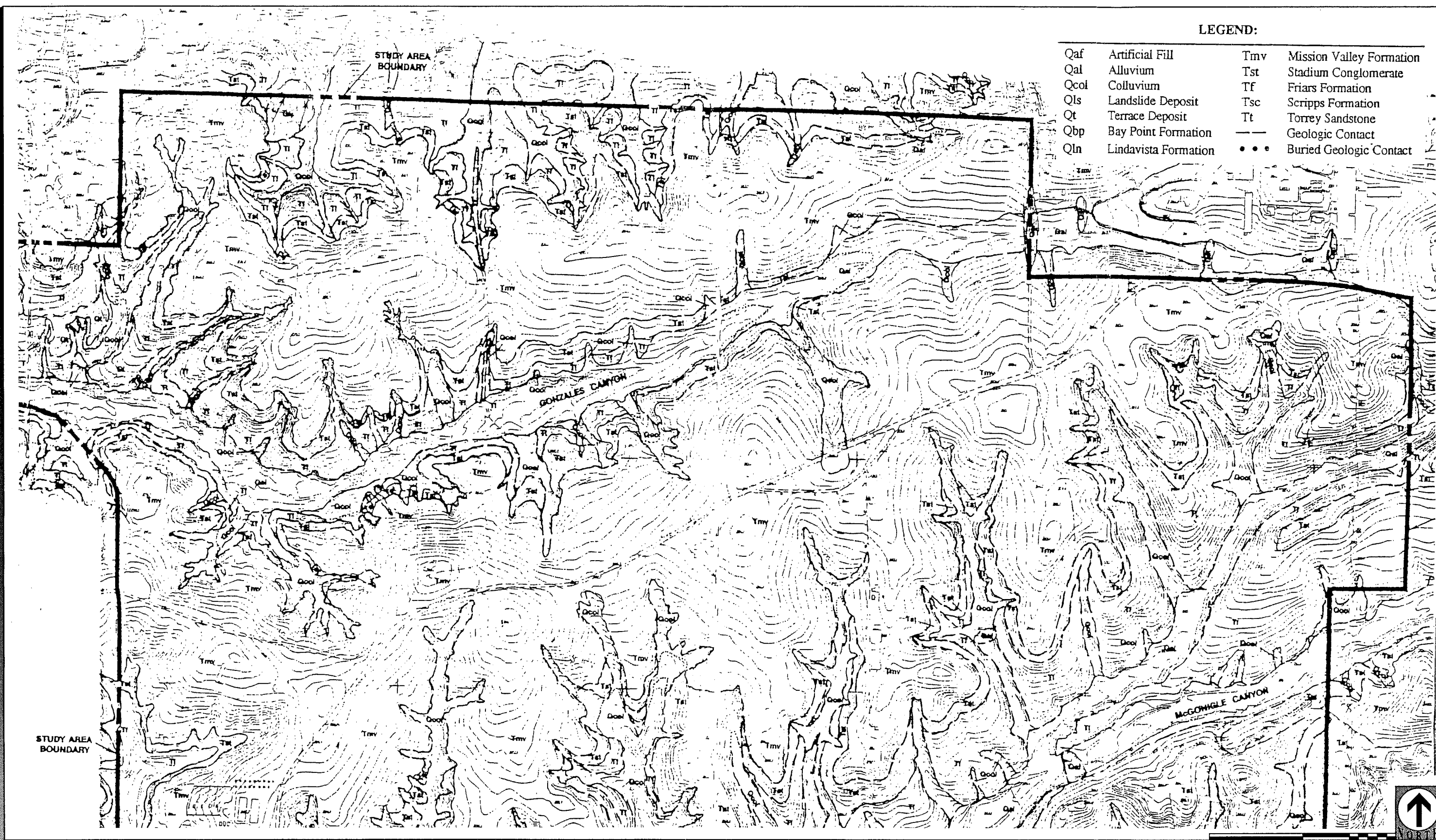
The topography of the project area ranges from nearly flat mesas and riverbeds to rugged, steeply sloping hillside terrain with a maximum of 290 vertical feet of relief. On-site elevations range from approximately 40 feet above MSL in the northwestern end of the project area to approximately 427 feet above MSL in the southeastern corner of the subarea near Del Mar Mesa. Three major canyons transect the site: Gonzales Canyon in the northwest and McGonigle and Deer Canyons in the southeast. Gonzales Canyon empties to the west into the San Dieguito Valley and is the primary drainage for the upland mesa areas north of Black Mountain Road. McGonigle Canyon, which is separated from Deer Canyon by the Santa Monica Ridge, is the primary drainage for the upland hills south of Black Mountain Road. Deer Canyon is the major drainage for the area south of Santa Monica Ridge. McGonigle and Deer Canyons meet at the western end of the Santa Monica Ridge and act as tributaries to the Carmel Valley drainage, in the southwestern portion of the project.

a) Geologic Formations

Eleven geologic units were mapped on the site. These include five Eocene sedimentary formations—the Torrey Sandstone, the Scripps Formation, the Friars Formation, Stadium Conglomerate, and the Mission Valley Formation—and six Quaternary units—the Lindavista Formation, the Bay Point Formation, river terrace deposits, alluvium, recent colluvium, and landslide deposits. Two additional surficial materials, topsoil and artificial fill, were observed on-site. These surficial deposits and geologic formations are discussed below and their locations in Pacific Highlands Ranch are shown on Figures 4H-1 to 4H-3.

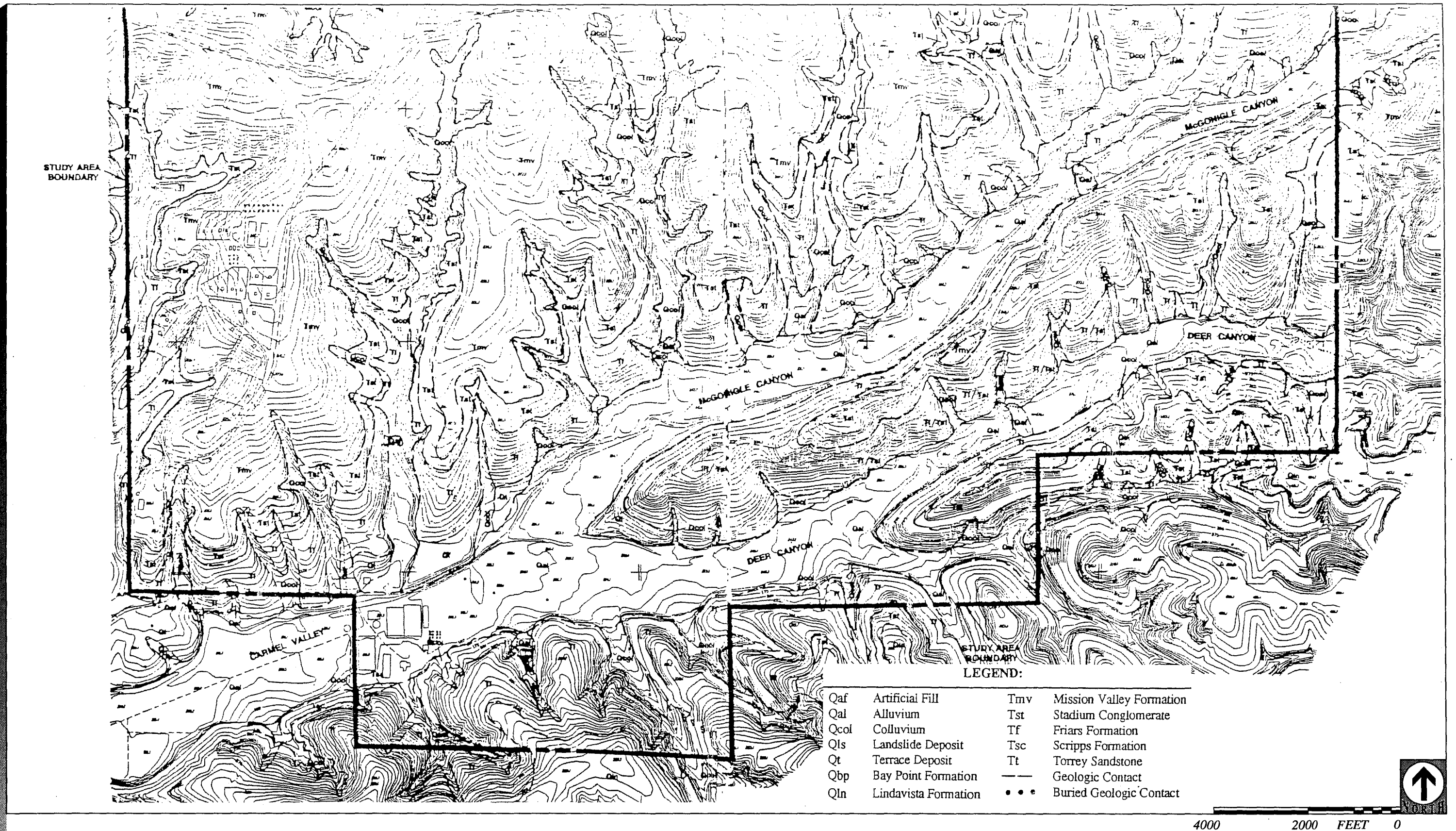
Torrey Sandstone (Tt)

The Torrey Sandstone consists of dense sandstone, which appears to be stable when exposed in cut slopes. The sandstone possesses relatively high shear strength, a low



Source: Helix Environmental 1993

FIGURE 4H-2
Site Geology, Northeastern Portion



Source: Helix Environmental 1993

FIGURE 4H-3
Site Geology, Southeastern Portion

expansive potential, and low compressibility characteristics in both an undisturbed or properly compacted condition. It should therefore provide suitable foundation support.

Scripps Formation (Tsc)

The Scripps Formation outcrops in a very limited area in the southwestern portion of the subarea, on the south side of Carmel Valley (Pacific Soils Engineering, Inc. 1989). This formation consists of yellowish brown sandstone and occasional conglomerate interbeds, which typically exhibit favorable geotechnical characteristics.

Friars Formation (Tf)

The Friars Formation consists of relatively dense, clayey sandstone and sandy claystone. The sandstone and claystone are relatively unstable when exposed in cut slopes. In addition to possessing relatively low shear strength, the more clayey portions of this formation are highly expansive. This formation is considered by the City's Seismic Safety Study to be slide-prone (City of San Diego 1983).

Stadium Conglomerate (Tst)

The Stadium Conglomerate, consisting of very dense, clayey sand, gravel, and cobbles, was found to overlie the Friars Formation and Torrey Sandstone. On the hillsides of the southeastern portion of the site, the Stadium Conglomerate and Friars Formation are interbedded and are distinguishable only by their stratigraphic position. This area has been mapped as Tf/Tst. The Stadium Conglomerate typically exhibits favorable geotechnical engineering properties.

Mission Valley Formation (Tmv)

The Mission Valley Formation outcrops predominantly in the northern portion of the property, overlying the Stadium Conglomerate. This geologic unit is generally comprised of relatively dense sandstone interbedded with siltstone and claystone. It is anticipated that significant quantities of low expansive sand occur within this unit.

Lindavista Formation (Qln)

The Lindavista Formation caps some of the higher benches on the site north of Gonzales Canyon and south of Deer and McGonigle Canyons. This unit consists of well-consolidated, weakly cemented cobble conglomerates. The Lindavista Formation typically exhibits very good geotechnical characteristics. Moderately heavy to heavy ripping should be anticipated during grading within this unit. Due to the high cobble content, this formation is generally considered to be less desirable for capping building pads than sandstone of the Mission Valley Formation or Torrey Sandstone. Cut or fill slopes should possess adequate stability if graded at inclinations of 1.5:1 and 2:1, respectively. The soil matrix of the conglomerate is generally of a low expansive

potential and should provide adequate bearing capacity for the support of conventional spread footings.

Bay Point Formation (Qbp)

The Bay Point Formation occurs in the northwestern portion of the site north of Gonzales Canyon. This formation is composed of mostly marine and nonmarine, poorly consolidated, fine- and medium-grained, pale brown, fossiliferous sandstone. The marine part of the formation interfingers with unfossiliferous sandstone that lies generally more than 100 but less than 200 feet above sea level (NCFUA plan). Typically, the Bay Point Formation exhibits a low to moderate expansion potential and generally good geotechnical characteristics. Slope instability in this formation has been observed at the site.

Terrace Deposits (Qt)

Thin stream terrace deposits form low benches along Gonzales and McGonigle Canyons in the project area. These deposits typically consist of dense, weakly cemented cobble conglomerates and sandstones, generally possessing excellent bearing characteristics in both a natural and properly compacted condition.

Alluvium (Qal)

Alluvial deposits of 5 to over 25 feet deep are found predominantly in the bottom of Gonzales, McGonigle, and Deer Canyons on the project site. The alluvium consists of silty sands to silts and may contain a large amount of cobbles and some boulders within the main streambeds. In general, the alluvial deposits are soft and porous, thus unsuitable for supporting engineered fills and/or structures.

Colluvium (Qcol)

Colluvial materials located on-site consist of silty sands to sandy clays with cobble-sized rock fragments and have an estimated maximum thickness of 10 to 15 feet in some areas. Deposits of colluvial materials are found within many of the secondary drainages on the project site.

Landslide Deposits (Qls)

Possible landslide deposits occur in two different categories as defined by the City of San Diego Seismic Safety Study (1983). The first category includes known or highly suspected landslides. The second category includes landslides which are considered to be possible or conjectured. The only known (first category) landslide deposits occur in the northwestern portion of the project site on the Bay Point Formation (see Figure 4H-1). Locations of possible or conjectured landslide deposits and slide-prone areas are mapped

on Figures 4H-1 to 4H-3. These areas occur primarily on the Mission Valley Formation (Tmv) and the Friars Formation (Tf).

Topsoil (unmapped)

In general, the topsoil overlying the Stadium Conglomerate, Scripps Formation, Torrey Sandstone, Lindavista Formation, Bay Point Formation, and terrace deposits is estimated to possess a low expansion potential. Its thickness is estimated to be on the order of two feet. Topsoil overlying the Mission Valley Formation and Friars Formation, however, is estimated to typically possess a higher expansive potential, and its thickness may vary from two to five feet.

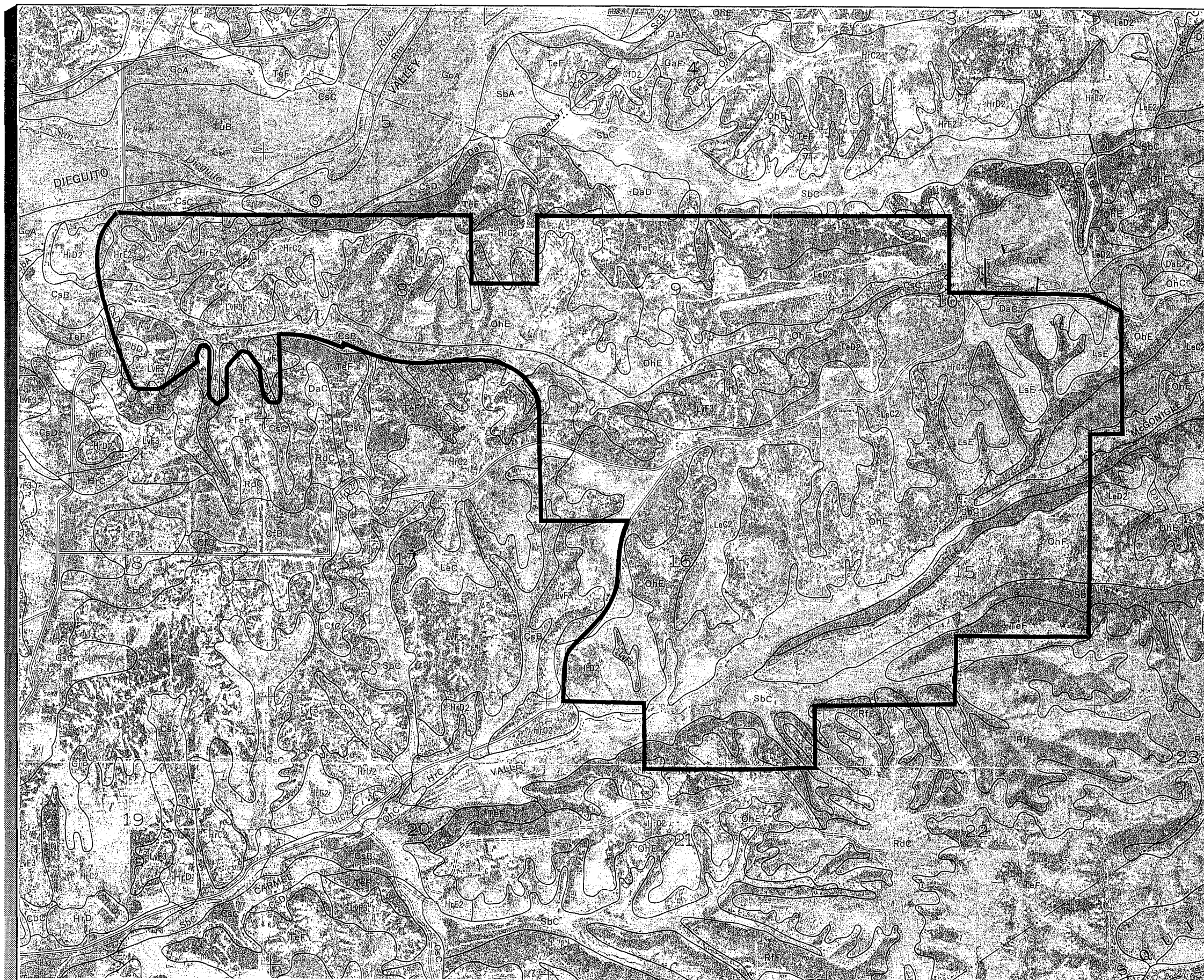
Artificial Fill (Qaf)

Artificial fill on the project site is associated with reservoir berms, unimproved roads, utility alignments, and trash pits left from previous farming practices. Two approximately 25-foot-high earthen dams exist on the site, one in McGonigle Canyon and the other in Deer Canyon. The dam in McGonigle Canyon is breached, while that in Deer Canyon impounds water. The fill material used on-site consists of silty sands and is probably locally derived (Pacific Soil Engineering, Inc. 1989). Several recently constructed detention basins were observed in several of the drainages in the northwestern portion of the site. These temporary structures appear to have been constructed to mitigate erosion during the heavy rains of early 1993 (Converse Consultants West 1993).

b) Soils

The soils present within Pacific Highlands Ranch are illustrated in Figure 4H-4. Table 4H-1 summarizes the erosion and runoff potential of each soil type (U.S. Department of Agriculture 1973). The soil type is generally associated with the changing topography within the site. The majority of the site is comprised of Las Flores loamy fine and Olivenhain cobbly loam, with the Las Flores loamy fine occurring on the mesa areas and the Olivenhain cobbly loam located on the more steeply sloping areas. Corralitos loamy sand occurs primarily in the bottom areas of Gonzales Canyon, while the Salinas clay loam occurs primarily in the bottom areas of McGonigle and Deer Canyons. Other soil types occur interspersed throughout the site.

Soils with the potential for slight to high erosion and slow to rapid runoff exist throughout the subarea. Soils with the potential for expansion and compression also exist on-site. As indicated in the geotechnical reports prepared for the project, these soils would require removal and recompaction in those areas proposed for development.



Soil Legend (on-site only):

- CbD Carlsbad gravelly loamy sand, 9-15% slopes
- CsB Corralitos loamy sand, 0-5% slopes
- CsC Corralitos loamy sand, 5-9% slopes
- CsD Corralitos loamy sand, 9-15% slopes
- DaC Diablo clay, 2-9% slopes
- DoE Diablo-Olivenhain complex, 9-30% slopes
- HrC2 Huerhuero loam, 5-9% slopes, eroded
- HrD2 Huerhuero loam, 9-15% slopes, eroded
- HrE2 Huerhuero loam, 15-30% slopes, eroded
- LeC2 Las Flores loamy fine sand, 5-9% slopes, eroded
- LeD2 Las Flores loamy fine sand, 9-15% slopes, eroded
- LsE Linne clay loam, 9-30% slopes
- LvF3 Loamy alluvial land-Huerhuero complex, 9-50% slopes, severely eroded
- OhE Olivenhain cobbly loam, 9-30% slopes
- OhF Olivenhain cobbly loam, 30-50% slopes
- RdC Redding gravelly loam, 2-9% slopes
- RdF Redding cobbly loam, 15-50% slopes, dissected
- SbC Salinas clay loam, 2-9% slopes
- TeF Terrace escarpments

FIGURE 4H-4

Soils Map



Source: United States Department of Agriculture 1973



TABLE 4H-1
SOIL CHARACTERISTICS WITHIN SUBAREA III

Soil Type	Runoff Potential	Erosion Hazard
Carlsbad gravelly loamy sand (9-15% slopes)(CbD)	Medium	Moderate
Corralitos loamy sand (0-5% slopes)(CsB)	Slow	Slight
Corralitos loamy sand (5-9% slopes)(CsC)	Slow to medium	Slight to moderate
Corralitos loamy sand (9-15% slopes)(CsD)	Medium	Moderate
Diablo clay (2-9% slopes)(DaC)	Slow to medium	Slight to moderate
Diablo-Olivenhain complex (9-30% slopes)(DoE)	Medium to rapid	Moderate to high
Huerhuero loam, eroded (5-9% slopes)(HrC2)	Slow to medium	Slight to moderate
Huerhuero loam, eroded (9-15% slopes)(HrD2)	Medium	Moderate
Huerhuero loam, eroded (15-30% slopes)(HrE2)	Medium to rapid	Moderate to high
Las Flores loamy fine sand, eroded (5-9% slopes)(LeC2)	Slow to medium	Slight to moderate
Las Flores loamy fine sand, eroded (9-15% slopes)(LeD2)	Medium	Moderate
Linne clay loam (9-30% slopes)(LsE)	Medium to rapid	Moderate to high
Loamy alluvial land-Huerhuero complex, severely eroded (9-50% slopes)(LvF3)	Rapid	Severe
Olivenhain cobbly loam (9-30% slopes)(OhE)	Medium to rapid	Moderate to high
Olivenhain cobbly loam (30-50% slopes)(OhF)	Rapid	High
Redding gravelly loam (2-9% slopes)(RdC)	Slow to medium	Slight to moderate
Redding cobbly loam, dissected (15-50% slopes)(RfF)	Medium to rapid	Moderate to high
Salinas clay loam (2-9% slopes)(SbC)	Slow to medium	Slight to moderate
Terrace escarpments (TeF)	Rapid	High

c) Groundwater

The northern portion of the subarea is located within the San Dieguito Hydrographic Unit, and the southern portion is located within the Peñasquitos Hydrographic Unit. Shallow groundwater conditions are indicated by standing water in Carmel Valley. It is likely that a permanent shallow groundwater table exists within Gonzales, McGonigle, and Deer Canyons. It is also likely that during the rainy season, shallow perched groundwater conditions could develop within alluvial and colluvial deposits in many areas.

Groundwater that occurs in the coastal plains section of the San Dieguito HU generally contains sodium chloride and has a concentration of total dissolved solids that often exceeds 1,000 milligrams per liter. Ratings for groundwater for domestic use in this section of the San Dieguito HU are largely inferior, due to a high TDS and sulfate content. Ratings for irrigation use in this unit are generally inferior because of the high electrical conductivity and a high chloride content. Locally, there are areas where the groundwater is rated suitable.

Groundwater quality in the Peñasquitos HU is generally marginal to inferior for domestic and irrigation purposes. In the coastal part of the Peñasquitos area, groundwater salinities range from 500 to 5,000 mg/l of TDS and usually exhibit a sodium chloride character. The prevailing sodium chloride character of the groundwater found in both the mesas and alluvium-filled valleys can be largely attributed to connate waters. Connate water is the water entrapped in the interstices of a sedimentary rock at the time the rock was deposited.

d) Geologic Hazards

Faulting and Seismicity

A seismic evaluation prepared for Pacific Highlands Ranch by Converse has not identified any known active or potentially active faults on the project site. Pacific Highlands Ranch is not within a currently designated Alquist-Priolo Special Studies Zone. Regional topographic and seismic characteristics are influenced by a series of northwest-trending faults associated with the San Andreas fault system.

As part of this seismic evaluation, an analysis was performed to estimate the magnitude and the peak horizontal ground accelerations (PHGA) at the site for the maximum credible earthquake (MCE) and the maximum probable earthquake (MPE). Seismic sources for the analysis included major regional faults and smaller faults located close to the site. A total of 12 faults or seismic sources were identified within a 62.1-mile radius of the subarea. The results of this analysis are summarized in Table 4H-2.

TABLE 4H-2
SUMMARY OF SEISMIC SOURCES AND PARAMETERS

Abbreviated Fault Name	Approximate Distance mi. (km)	Maximum Credible Magnitude (Richter scale)	Peak Site Acceleration (g)	Site Intensity (Mercalli scale)	Maximum Probable Magnitude	Peak Site Acceleration (g)	Site Intensity (Mercalli scale)
Rose Canyon	5 (9) - 8 (13)	7.50	0.44 - 0.36	X - IX	6.25	0.31 - 0.24	IX
Coronado Bank/Offshore Zone of Deformation	17 (27) - 19 (31)	7.50	0.22 - 0.20	VIII	6.00	0.09 - 0.08	VII
Elsinore	29 (46)	7.50	0.14	VIII	6.75	0.09	VII
San Clemente	50 (81)	7.50	0.08	VII	6.25	0.03	V
Palos Verde Hills	51 (82)	7.50	0.05	VI	5.50	0.01	III
Coyote Creek (San Jacinto)	52 (83)	7.50	0.07	VI	6.00	0.02	IV
Casa Loma-Clark (San Jacinto)	52 (84)	7.50	0.07	VI	7.00	0.05	VI
Newpart-Inglewood	54 (86)	7.50	0.07	VI	6.50	0.03	V
Hot S-Buck Ridge (San Jacinto)	54 (87)	7.50	0.07	VI	6.25	0.02	IV
Whittier-North (Elsinore)	59 (95)	7.50	0.06	VI	6.25	0.02	IV
Glen Helen-Lytle (Claremont)	59 (95)	7.50	0.06	VI	7.00	0.04	V
Borrego Mountain (San Jacinto)	61 (98)	6.50	0.02	IV	6.25	0.02	IV

Table 4H-2 presents distances from the subarea to the faults, MCE, MPE, and expected horizontal bedrock accelerations at the site. The nearest faults are the Rose Canyon fault, located approximately 5 to 8 miles southwest of the subarea, and the Coronado Bank fault, an offshore zone of deformation located approximately 17 to 19 miles west of the subarea. The closest major active fault, the Elsinore fault, is located approximately 29 miles northeast of the subarea. The PHGA range for the Rose Canyon fault's MCE and MPE events are 0.44 g (gravity) to 0.39 g and 0.31 g to 0.24 g, respectively. The PHGA for the Elsinore fault's MCE and MPE events are 0.14 g and 0.09 g, respectively.

In addition to these faults, the State Route 56 West, Carmel Valley Restoration and Enhancement Project Plan Amendments Final EIR identifies a potentially active fault in Carmel Valley approximately 2,000 feet east of the I-5/Carmel Valley Road intersection (City of San Diego 1990).

e) Seismic Safety Study

The City of San Diego Seismic Safety Study (Figure 4H-5) provides hazard categories for areas within the city. The hazard category describes the geologic feature or condition suspected at the site. A relative risk is assigned to each hazard category. Based on relative risk, the level of required geotechnical review for planning and development permits and building permits is determined. The relatively level mesa areas on-site are in hazard category 53: unfavorable geologic structure, low to moderate risk.

The slopes on-site are generally rated as 23, Friars: neutral or favorable geologic structure with a low to moderate risk for slope instability. Areas with a 23 rating are considered to be slide-prone formations. The slide-prone formations are generally located on the steeply sloping areas that extend from the level mesas to the floor of the valleys and tributary canyons. There are four discrete areas on-site with a 22 rating, for possible or conjectured landslides with a moderate risk.

f) Liquefaction

Liquefaction occurs when soils lose all shear strength during an earthquake. The result can be total to differential settlement of structures founded in liquefying soils. A rating of 31 used in the seismic safety study (see Figure 4H-5) is applied to major alluvial valleys that have a groundwater table within 25 feet of the surface. No such conditions exist in or near Pacific Highlands Ranch. The floor of Deer Canyon and McGonigle Canyon have geologic hazard ratings of 32, a relatively low potential for liquefaction because the groundwater table is lower than 25 feet from the surface. Areas rated as 32 consist of minor drainages with fluctuating groundwater.

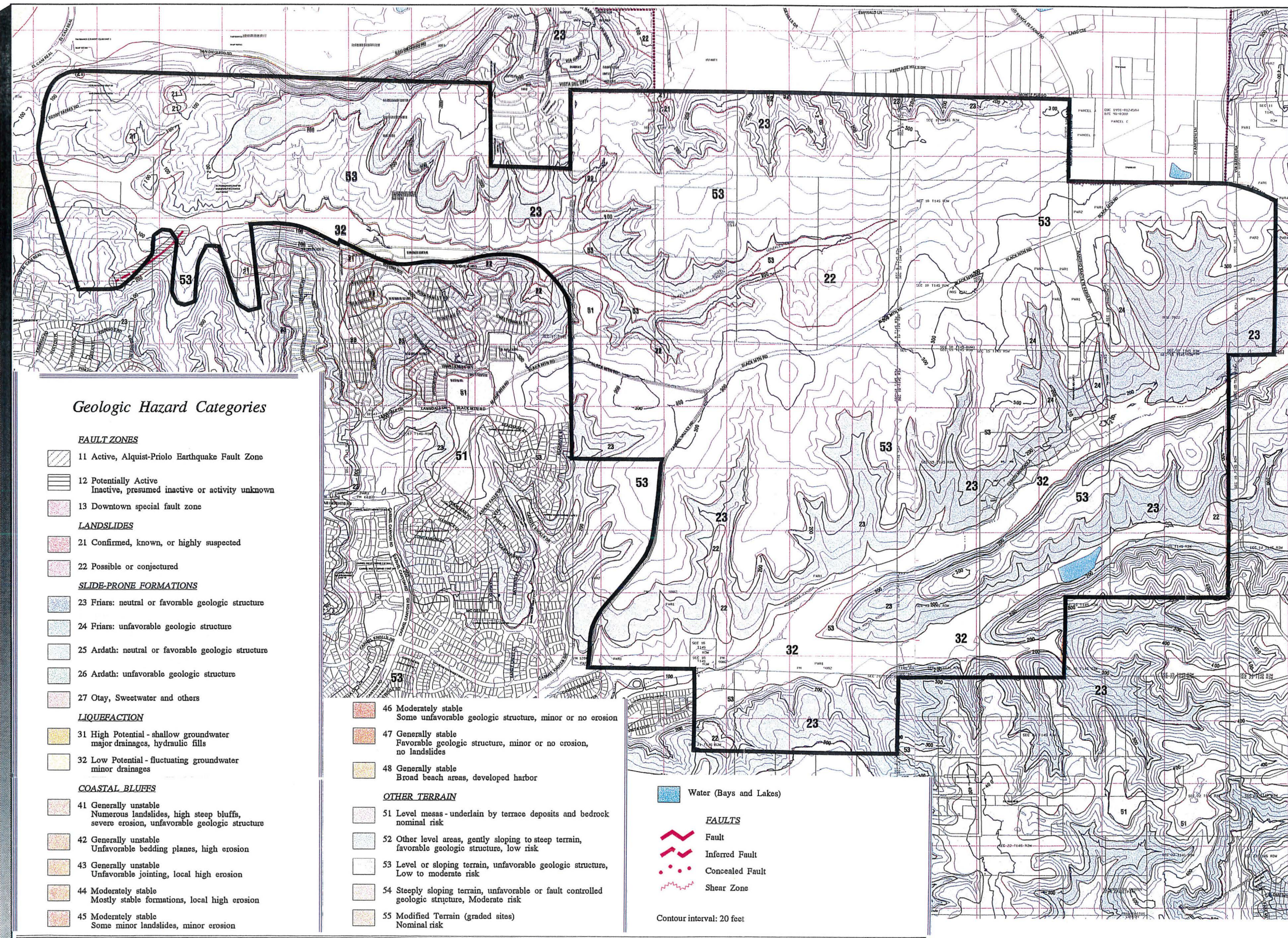
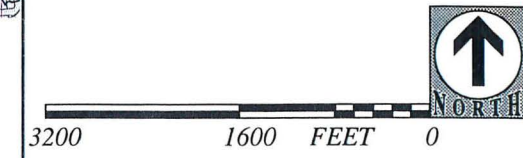


FIGURE 4H-5
Seismic Safety
Study Map



Geology/Soils/Erosion Issues

1. Are there geologic or soils conditions in the subarea which would present a constraint to development?
2. Would development of the site increase the potential for erosion?

1) Issue

Are there geologic or soils conditions in the subarea which would present a constraint to development?

Impacts**a) Geologic Formations and Surficial Deposits****Torrey Sandstone (Tt) and Scripps Formation (Tsc)**

Since these formations are relatively unstable when exposed in cut slopes, slope stabilization may be required in these areas. The sandstones should be suitable for capping building areas which might otherwise contain expansive soils at grade. Excavations within these formations should be readily accomplished with moderate ripping by conventional earth-moving equipment. The occurrence of localized cemented stones or concretions may be expected; however, the need for blasting is unlikely.

Friars Formation (Tf)

The commonly occurring claystone beds within the Friars Formation generally require slope stabilization measures if exposed in cut slopes or if they lie at shallow depth beneath fill slopes. The clays of the Friars Formation are moderately to highly expansive and will require either selective grading or specially designed foundations. This formation should be rippable with conventional grading equipment.

Stadium Conglomerate (Tst)

Moderately heavy to heavy ripping should be anticipated during grading within this unit. Because of the high cobble content, this formation is generally considered less desirable than sandstones of the Mission Valley Formation or Torrey Sandstone for capping building pads. Cut or fill slopes should possess adequate stability if graded at inclinations of 1.5:1 and 2:1, respectively. The soil matrix of the conglomerate is generally of low expansive potential and should provide adequate bearing capacity for the support of conventional spread footings.

Mission Valley Formation (Tmv)

Cut and fill slopes with inclinations of 2.0 horizontal to 1.0 vertical can be expected to possess adequate overall stability. Excavation should be readily accomplished with moderate ripping and conventional heavy-duty grading equipment. The occurrence of localized cemented zones or concretions is likely, but the need for blasting is considered extremely remote.

Lindavista Formation (Qln)

Moderately heavy to heavy ripping should be anticipated during grading within this unit. Due to the high cobble content, this formation is generally considered to be less desirable for capping building pads than sandstone of the Mission Valley Formation or Torrey Sandstone. Cut or fill slopes should possess adequate stability if graded at inclinations of 1.5:1 and 2:1, respectively. The soil matrix of the conglomerate is generally of a low expansive potential and should provide adequate bearing capacity for the support of conventional spread footings.

Bay Point Formation (Qbp)

This formation may require slope stabilization measures where it is exposed in cut slopes or if it exists at shallow depths beneath fill slopes. This formation should be rippable with conventional grading equipment.

Terrace Deposits (Qt)

Since only limited areas of the project site are covered with terrace deposits, it is likely that they will not be of major consideration during site development.

Alluvium (Qal)

Where structural improvements are proposed in the area of alluvial soils, remedial grading in the form of removal and recompaction would be required. Impacts on alluvial soils are not expected to be significant, as most of the proposed development would take place out of the canyons where alluvial deposits are prevalent.

Colluvium (Qcol)

Removal and recompaction of colluvium would be necessary in areas where structural improvements are proposed. Due to the limited extent of these materials, no impact is expected on the proposed development.

Landslide Deposits (Qls)

The proposed development plan for Pacific Highlands Ranch would avoid construction on known landslide deposits, thereby avoiding potential impacts.

Topsoil (unmapped)

The unconsolidated consistency and expansive potential of the topsoil may require remedial grading, such as removal and recompaction.

Artificial Fill (Qaf)

In general, the fill soils present on the site are not considered suitable to support structural improvements. It is likely that the fill soils would require removal and recompaction in all structural areas. All earthen dams that are planned to remain in use should be evaluated for proper stability and modified as necessary.

b) Groundwater

Where filling of canyons or ravines is planned, subdrains to relieve the potential buildup of hydrostatic pressure would be required. Due to the anticipated installation of municipal water, sewer, and storm drain systems, the proposed development would not have an adverse impact on existing groundwater quality. Usage of groundwater for agricultural and domestic purposes is anticipated to cease upon the installation of a municipal water supply system, and existing groundwater quality problems in the area would, therefore, not impact the proposed project.

c) Geologic Hazards**Ancient Landslides**

In order to accurately determine the size and subsurface geometry of erosional remnants of additional slides that were not identified within the Friars Formations, exploratory drilling and/or trenching would be required. Where landslides are present in areas to be developed, earth buttresses or other remedial measures could be provided during site development to properly stabilize the ancient landslide. Similarly, remedial grading may be required where slides are not present but where weak claystone beds are encountered. Slide debris often possesses zones of compressible material and some recompaction of these soils may be necessary.

Liquefaction

The risk of liquefaction adversely affecting site development is extremely low. Liquefaction-prone areas exist mainly in the canyon bottoms, which are designated as open space in the NCFUA Framework Plan.

Faulting and Seismicity

The seismic hazard considered most likely to impact the site is ground shaking due to an earthquake on a major, active, regional fault. Liquefaction resulting from seismic shaking could impact limited areas of the site, as discussed above.

The Rose Canyon fault may be capable of producing a Richter magnitude earthquake greater than 6.0; the Elsinore fault is believed to have a repeat activity interval of approximately 60 years for magnitude 7.3 shaking; and the San Jacinto fault could produce a Richter magnitude of 7.8. Due to their distance from the project site, design engineering of structures and features could provide an adequate margin of safety for seismic events along these faults.

Significance of Impacts

There are no significant soil or geologic conditions that were observed or known to exist on the project site which would preclude development of the property. However, potentially significant geologic conditions exist which require mitigation, including ancient landslides, expansive soils, unstable cut slopes, alluvial soils, poorly consolidated soils, and ground shaking due to an earthquake.

Mitigation, Monitoring, and Reporting

For each specific development application in Pacific Highlands Ranch, the City will require the applicant to submit a detailed geotechnical study by a qualified geotechnical firm. The conclusions and implementation of the recommendations provided in these reports would mitigate the potentially significant effects of soil and geologic conditions for future developments in Pacific Highlands Ranch to below a level of significance. The types of mitigation requirements which the feasibility studies are likely to contain are summarized below.

a) General Measures

1. In areas of proposed development, landslides, improperly compacted fill soil, weak claystone beds, and potentially compressible deposits of alluvium and colluvium may require special attention. Buttresses, stabilizing fill material, or other methods of stabilization will probably be required in developed areas where weak claystone beds or landslides are encountered. In areas where landslides exist off-site, and where stabilization is not feasible, setbacks may be required.
2. The Mission Valley and Friars Formations, and some areas of topsoil, may include highly expansive soil. Based on this review of geologic units on the site, it is anticipated that an adequate quantity of low expansive soil exists on the site to mitigate the adverse impact of expansive soil, when it is encountered.
3. If there are proposed improvements that will be sensitive to potential settlement, partial removal and recompaction of compressible alluvium and colluvium will be necessary.

4. It is anticipated that areas of perched groundwater may exist within low-lying alluvial areas. Subdrains or other remedial measures will be necessary where drainage courses are proposed to be filled.
5. For the purpose of preliminary design, it is recommended that portions of the site that are subject to inundation due to a dam failure upstream be located and considered for restricted usage.

b) Grading

For the purpose of preliminary design, cut and fill slopes shall be designed no steeper than 2:1. The shear strengths of existing soil and rock units will generally limit safe allowable slope height. The potential impact of geologic conditions on slope stability shall be evaluated in areas of proposed high cut slopes.

c) Foundations

The dominant soil conditions on the site are generally suitable for supporting conventional spread footings, if the soil is in a dense and undisturbed condition or in a properly compacted condition. The actual soil characteristics and proposed design parameters for structures on the site will determine minimum footing dimensions and requirements for reinforcement. These factors are not currently known; however, it is estimated at this time that spread footings that are designed in accordance with the Uniform Building Code will be designed for an allowable soil bearing pressure of at least 2,000 pounds per square foot.

d) Drainage and Maintenance

Proper surface drainage shall be provided and maintained, as it is essential to soil stability and to reduce the potential for erosion. Drainage swales shall be installed on graded pads to conduct storm or irrigation runoff to controlled drainage facilities and away from buildings and the tops of slopes. Measures shall be taken to ensure that storm and irrigation water does not flow over the tops of cut or fill slopes.

e) Consultation and Plan Review

A more comprehensive soil and geologic evaluation shall be performed prior to providing final grading plans for the site. This evaluation shall be required to be implemented as a condition of final maps and grading plans. A geotechnical engineer shall also perform an on-site reconnaissance. A report shall be submitted for review and approval to the City's Engineering and Development Department prior to issuing grading permits.

2) Issue

Would development of the site increase the potential for erosion?

Impacts

Results of grading activities that will disrupt soil profiles include an increased exposure to wind and rain, which are erosive forces. Low cohesive sand and other on-site soils have been identified as highly erodible and may be exposed in excavations, especially those within the terrace deposits, the Bay Point Formation, the Torrey Sandstone, and the Mission Valley Formation. Other soil conditions and geologic units on the site are anticipated to have a low potential for erosion. Undisturbed soil and rock conditions are generally expected to have a low potential for erosion.

Significance of Impacts

Future grading activities for the implementation of specific development projects in Pacific Highlands Ranch would result in a potentially significant increase in soil erosion.

Mitigation, Monitoring, and Reporting

Prior to approval of a grading permit, each applicant for a specific development project in Pacific Highlands Ranch shall prepare a grading/construction management plan. The following mitigation measures, in addition to those listed in the Hydrology/Water Quality section of this MEIR (Chapter 4.D), shall be incorporated into the plan, if appropriate. The City's Development Services must approve the grading/construction management plans before a grading permit is issued and grading will commence. The geotechnical engineer shall inspect all cut and fill slopes and foundation work. A landscape architect will observe the revegetation of graded slopes. Each of these experts shall submit a report to the City.

1. Areas that have been stripped of native vegetation or areas of fill material shall require particular attention. These areas may require desilting basins, improved surface drainage, or planting of ground covers early in the improvement process, to reduce the potential for erosion.
2. Short-term measures for controlling erosion shall be incorporated into grading plans for the site. These measures shall include sandbag placement and temporary detention basins, as required by the City's Engineering and Development Department.
3. Catch basins shall be provided during grading activities.

4. Grading activities may be restricted during the rainy season, depending on the size of the specific operation. This season typically encompasses November through March. Grading activities may otherwise be restricted by their proximity to sensitive wildlife habitat.
5. After grading, slopes shall be immediately revegetated or hydroseeded with erosion-resistant species. These plants should be carefully irrigated to ensure coverage of the slopes prior to the next rainy season.
6. Measures to control construction sediment shall be implemented in areas near watercourses. These measures may include interim desiltation basins, sandbags, hay bales, or silt fences, which shall be placed at the toe of slopes to prevent erosion. Punch straw or matting shall be installed to stabilize graded slopes and prevent the slope or construction material from sloughing into watercourses.

I. Natural Resources

Existing Conditions

Evaluations of agricultural resource potential are based on two data sources: historical use of the area for agricultural purposes and analyses of project area soil qualities.

a) Agricultural Resources

Pacific Highlands Ranch Agriculture

As stated in the Framework Plan EIR, agricultural production in Pacific Highlands Ranch has a lengthy history but is not regionally significant. A brief summary begins with the McGonigle family, who started farming in the Carmel Valley area in the 1860s. By 1872 (San Diego County Map), two sons were farming in McGonigle Canyon. Aerial photographs taken in 1928 show farming activities in the western half of McGonigle as well as Gonzales Canyon. City of San Diego agricultural land use maps from the 1950s show field crops in Pacific Highlands Ranch. Much of the farming was on hills adjoining Gonzales Canyon and in the north-central portion of the area. Two small areas (5-10 acres each) of vegetables and orchards are also shown in Carmel Valley. By 1958, field crops were still located in Carmel Valley, McGonigle Canyon, and the western end of Deer Canyon. A 1966 map shows an overall decrease in agricultural activity, although crops were still present in McGonigle and Deer Canyons, the Carmel Valley area, and north of McGonigle Canyon.

Agricultural pursuits in Pacific Highlands Ranch overall are diminishing. The largest crop producer in Pacific Highlands Ranch (Mr. Ukegawa) has been leasing the property since 1985. Although he has increased usage dramatically over prior farming interests (the former producer grew nonirrigated beans), there has been an estimated 40 to 50 percent reduction in his farming efforts due to market conditions and competition from Mexico. Crops grown regularly include tomatoes, cucumbers, green beans, squash, sweet corn, bell pepper, celery, and strawberries. Although his crop ratio changes from year to year based on anticipated demand, tomatoes are generally the largest crop.

Prime Farmland in Pacific Highlands Ranch (as defined by the State of California on its Important Farmlands Map) is limited to approximately 136 acres in McGonigle and Deer Canyons (Figure 4I-1). Figure 4I-1 also shows the locations of the other agricultural categories in the subarea. Subarea agricultural endeavors are primarily located on Farmlands of Local Importance and Unique Farmlands.

As shown on Figure 4I-1, most of Pacific Highlands Ranch contains Farmlands of Statewide Importance, Unique Farmland or Farmlands of Local Importance. The

remainder of the subarea is identified on the map as grazing land or lands which do not meet any important farmland category. A recent aerial photograph of the site (see Figure 2-4) shows that about one-half (1,320 acres) of the subarea has been under cultivation in recent years. Much of this is actually fallow field, or at least acreage previously in agriculture. Currently, 500 acres are used on an annual basis for crop production. Most of the field crops in the subarea are located south of Gonzales Canyon, in an area classified by the state as unique or of local or statewide importance. Additional farming is taking place on the ridge between the western reaches of McGonigle and Deer Canyons and in a north/south-trending strip extending from Black Mountain Road southerly toward Carmel Valley. These areas are not classified on Figure 4I-1 as having any special farmland importance. The largest of agricultural areas, producing ornamentals, is located north and south of Del Mar Heights Road and north of Black Mountain Road. Smaller tree and sod nurseries are located between Black Mountain Road and Gonzales Canyon just west of the residential development along Caminito Mendiola.

Pacific Highlands Ranch Soils

In Soil Survey, San Diego Area, Part III (USDA 1973), soils of the region have been rated for suitability for five specific intensely grown crops by two crop suitability interpretations. There are the Storie Index and Capability Group (Table 4I-1). The Storie Index expresses numerically the relative degree of suitability, or value of a soil for general intensive agriculture. Profile characteristics, soil surface texture, slope, and other miscellaneous conditions are assigned percentages, with the most agriculturally favored condition rated as 100 percent. These percentage factors are multiplied together to achieve the final Storie Index rating. Soils in the San Diego region range from a low of about 5 to a high of 97.

The Capability Group classifies soils according to their limitations when cultivated and according to the way they respond to management practices. Soils are grouped in eight classes, from Class I through VIII, with Class I being the least restricted.

The on-site soils are described above in Chapter 4.H, Geology and Soils (see Figure 4H-2 and Table 4H-1).

There are no Class I soils within Pacific Highlands Ranch. Class II soils, however, account for 225 acres (8 percent) and are located in Deer and McGonigle Canyons. Class III soils are more severely limited and may require both increased selectivity of cropping programs and conservation practices. Approximately 161 acres (6 percent) of the project area, primarily associated with Gonzales Canyon, are defined as having Class III soils. Class IV soils require careful management practices, but farming of row, grain, and tree crops is still possible. Approximately 890 acres (34 percent) of the site is defined as having Class IV soils and are, in fact, the areas where the majority of agricultural activity

TABLE 4I-1
ACREAGE, CAPABILITY CLASSIFICATION, AND STORIE INDEX
OF SUBAREA III SOIL TYPES

Soil	Soil Name	Capability Classification	Acreage	Storie Index	Weighted Storie Index
CbD	Carlsbad gravelly loamy sand, 9-15% slopes	IVe-8	7	20	0.05
CsB	Corralitos loamy sand, 0-5% slopes	IIIs-4	157	64	3.79
CsC	Corralitos loamy sand, 5-9% slopes	IIIs-4	4	61	0.09
CsD	Corralitos loamy sand, 9-15% slopes	IVs-4	5	52	0.10
DaC	Diablo clay, 2-9% slopes	Ile-5	19	42	0.30
DoE	Diablo-Olivenhain complex, 9-30% slopes	IVe-5 (Diablo) VIe-7 (Olivenhain)	2	23	0.02
HrC2	Huerhuero loam, 5-9% slopes, eroded	IVe-3	231	38	3.31
HrD2	Huerhuero loam, 9-15% slopes, eroded	IVe-3	62	36	0.84
HrE2	Huerhuero loam, 15-30% slopes, eroded	VIe-3	54	32	0.65
LeC2	Las Flores loamy fine sand, 5-9% slopes, eroded	IVe-3	459	31	5.37
LeD2	Las Flores loamy fine sand, 9-15% slopes, eroded	IVe-3	68	29	0.74
LsE	Linne clay loam, 9-30% slopes	IVe-1	57	14	0.30
LvF3	Loamy alluvial land-Huerhuero complex, 9-50% slopes, severely eroded	VIIIIs-1	173	23	1.50
OhE	Olivenhain cobbly loam, 9-30% slopes	VIe-7	681	20	5.14
OhF	Olivenhain cobbly loam, 30-50% slopes	VIIe-7	132	10	0.50
RdC	Redding gravelly loam, 2-9% slopes	VIe-3	7	19	0.05
RfF	Redding cobbly loam, 15-50% slopes, dissected	VIIe-7	65	10	0.25
SbC	Salinas clay loam, 2-9% slopes	Ile-1	206	73	5.67
TeF	Terrace escarpments	VIIIe-1	261	< 10	0.98

is currently taking place. Approximately 52 percent of the soils on-site are classified in classes below Class IV and are not suitable for cultivation of coastal crops; their uses are mainly restricted to pasture, range, or recreational uses.

The best Pacific Highlands Ranch soils under the Storie Index system have a rating between 60 and 80 and account for approximately 14 percent of project area soils. Soils with this rating are suitable for most crops and have few special management needs. Approximately 1 percent of the soils have a rating between 40 and 60 and are suited to crops which require special management. Sixty-six percent of Pacific Highlands Ranch soils have a rating between 20 and 40, indicating that usage for crop is severely limited. Nineteen percent of the soils on-site have Storie Index ratings of less than 20, indicating unsuitability for any crops.

In addition, the Soil Survey (USDA 1973) classifies an area as being "agricultural land" if the soils have a fair or good suitability rating for at least one of the specified crops. As Table 4I-2 illustrates, almost all the soils found on the site are rated as fair to good for at least one of the crops. For those soils with no ratings at all, no data were provided as to their crop suitability.

Prime Farmland Definitions

The viability of a particular piece of land to support agriculture is based on a number of factors, including climate, growing season, topography, water availability, and soils. Since most land will support some form of agriculture, it is important to further refine the agricultural land definition to include only "prime agricultural land." "Conversion of prime agricultural land to non-agricultural use of impairment of the agricultural productivity of prime agricultural land" is one example cited in CEQA as an environmental "consequence which may be deemed to be significant" (State Administrative Code, Section 15064).

Prime agricultural land has been defined in the California Government Code, Section 51201. This definition is also included in the Williamson Act, which is California State legislation allowing the creation of agricultural preserves, and has been incorporated into the Local Agency Formation Commission (LAFCO) guidelines governing agricultural land proposed for annexation to incorporated cities. Prime agricultural land, as defined by the act, includes land, whether a single parcel or contiguous parcels, which has not been developed for a use other than an agricultural use and meets any of the following qualifications:

1. All land which qualifies for a rating as Class I or II on the Soil Conservation Service Land Use Capability classifications.
2. Land which qualifies for a rating of 80 to 100 on the Storie Index.

TABLE 4I-2
CROP SUITABILITY

Soil	Soil Name	Avocado	Citrus	Truck Crops	Tomatoes	Flowers
CbD	Carlsbad gravelly loamy sand, 9-15% slopes	NR	Fair	NR	NR	Fair
CsB	Corralitos loamy sand, 0-5% slopes	Good	Good	Good	NR	Good
CsC	Corralitos loamy sand, 5-9% slopes	Good	Good	Fair	NR	Good
CsD	Corralitos loamy sand, 9-15% slopes	Good	Good	NR	NR	Fair
DaC	Diablo clay, 2-9% slopes	NR	NR	NR	Good	NR
DoE	Diablo-Olivenhain complex, 9-30% slopes	--	--	--	--	--
HrC2	Huerhuero loam, 5-9% slopes, eroded	NR	NR	Fair	Good	Fair
HrD2	Huerhuero loam, 9-15% slopes, eroded	NR	NR	NR	Fair	Fair
HrE2	Huerhuero loam, 15-30% slopes, eroded	--	--	--	--	--
LeC2	Las Flores loamy fine sand, 5-9% slopes, eroded	NR	NR	Fair	NR	Good
LeD2	Las Flores loamy fine sand, 9-15% slopes, eroded	NR	NR	NR	NR	Fair
LsE	Linne clay loam, 9-30% slopes	--	--	--	--	--
LvF3	Loamy alluvial land-Huerhuero complex, 9-50% slopes, severely eroded	--	--	--	--	--
OhE	Olivenhain cobbly loam, 9-30% slopes	NR	Fair	NR	NR	NR
OhF	Olivenhain cobbly loam, 30-50% slopes	--	--	--	--	--
RdC	Redding gravelly loam, 2-9% slopes	--	--	--	--	--
RfF	Redding cobbly loam, 15-50% slopes, dissected	--	--	--	--	--
SbC	Salinas clay loam, 2-9% slopes	NR	Fair	Fair	Good	Fair
TeF	Terrace escarpments	--	--	--	--	--

NR = not rated

3. Land which supports livestock used for the production of food and fiber and which has an annual carrying capacity equivalent to at least one animal unit per acre, as defined by the U.S. Department of Agriculture (USDA).
4. Land planted with fruit- or nut-bearing trees, vines, bushes, or crops that have a nonbearing period of less than five years and which will normally return, during the commercial bearing period on an annual basis, from the production of unprocessed agricultural plant production, not less than two hundred dollars (\$200.00) per acre.
5. Land which has returned from the production of unprocessed agricultural plant products at an annual gross value of not less than two hundred dollars (\$200.00) per acre for three of the previous five years.

In addition to designating agricultural preserves, the Williamson Act allows landowners to enter a contractual agreement with the federal government protecting the land from taxation increases in return for its continued use for agriculture. Williamson Act preserves and contract lands are noted on County Tax Assessor maps. Current assessor's maps show no agricultural preserves or contract lands within Pacific Highlands Ranch.

Other categories are recognized as well: Farmlands of Statewide Importance, which are lands with similar characteristics to Prime Farmlands but with minor limitations such as slopes or less ability to hold and store moisture; Unique Farmlands, which include lesser-quality soils used in the production of leading cash crops or dry-farmed prime or statewide important farmlands; Farmlands of Local Importance, which are lands of importance to the local agricultural economy; and Grazing Lands, which are suitable for the grazing of livestock.

b) Mineral Resources

The following discussion focuses on the regional significance of aggregate resources which are actively mined in San Diego County. No other mineral resources of value are expected to be found within the project site area.

Aggregate consists of sand, gravel, and crushed rock. Aggregate is considered a mineral commodity and provides bulk and strength for a multitude of uses in metropolitan areas, especially in development areas where new construction is common. Sand and crushed rock are used as aggregate in portland cement concrete (PCC) and asphaltic concrete. Blocks of granite rock are quarried for decorative rock, monuments, and surface plaster. Large irregular blocks of stone are quarried for use as riprap. Decomposed granite is taken from pits for use as a base under road pavements and cold-mixed asphaltic pavement.

Aggregate materials are classified as either reserves or resources. Reserves are defined by the California Department of Mines and Geology (CDMG) as the "aggregate material believed to be acceptable for commercial use, that exist within property boundaries owned or leased by an aggregate producing company, and for which permission allowing extraction and processing has been granted by the proper authorities" (California Department of Conservation 1982). Aggregate resources include "reserves as well as all similar potentially usable aggregate materials that can be economically mined in the future, but for which no use permit allowing extraction has been granted."

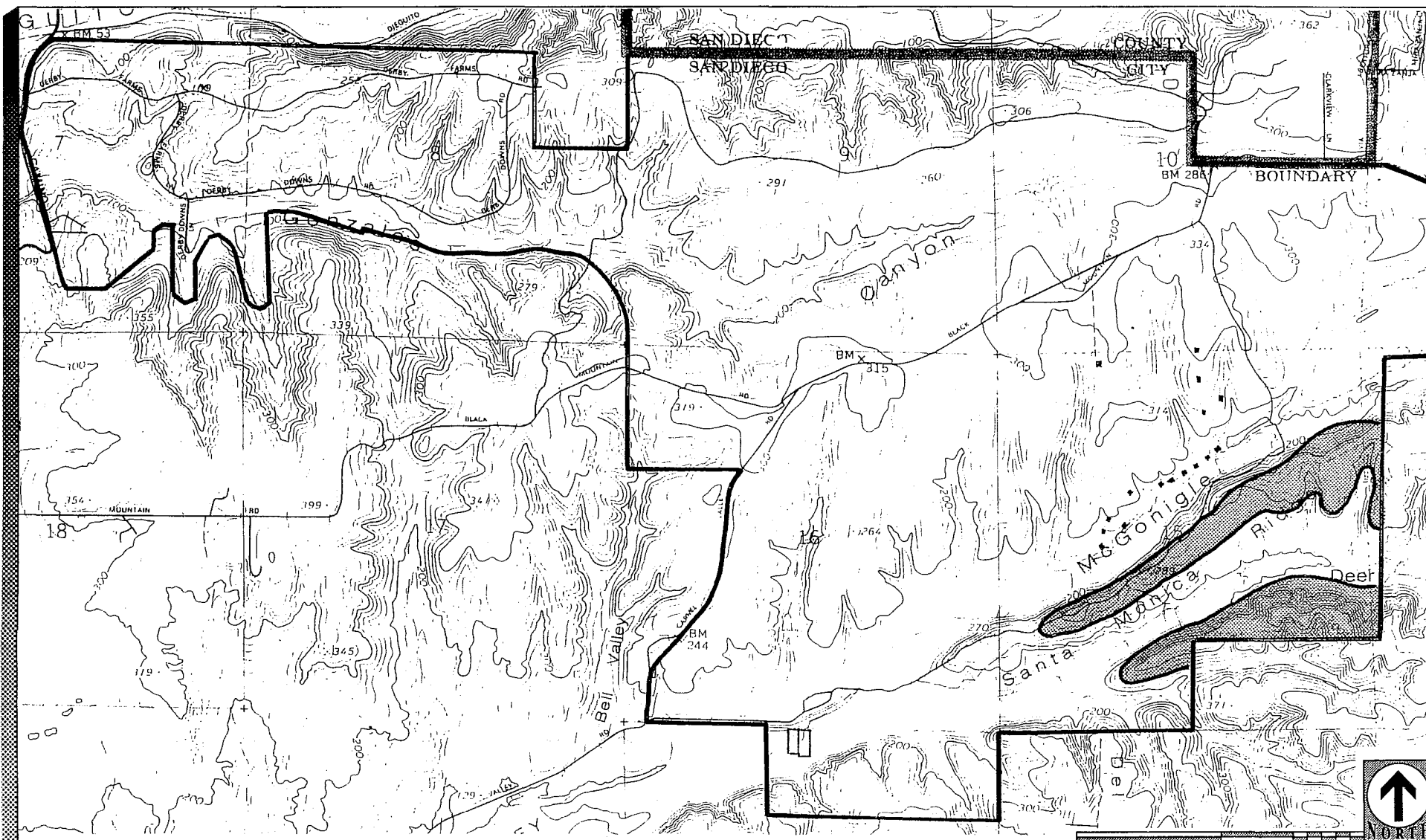
The scarcest aggregate deposits in San Diego County are those which are suitable for use as PCC aggregate. The materials specifications for PCC aggregate are more restrictive than for other aggregate types. As a result, fewer deposits satisfy these specifications.

In accordance with classification guidelines established by the State Mining and Geology Board and in compliance with the Surface Mining and Recovery Act of 1975, the state geologist is required to classify areas into Mineral Resources Zones (MRZs). These zones are established on the basis of an aggregate resource appraisal which includes an analysis of geologic reports and maps, field investigations, an examination of active sand and gravel mining operations, analyses of drill hole data, interpretation of aerial photographs, and evaluation of private company data. The guidelines for establishing the MRZ are as follows:

- MRZ-1. Areas where adequate information indicates that no significant mineral deposits are present or where it is judged that little likelihood exists for their presence.
- MRZ-2. Areas where adequate information indicates that significant mineral deposits are present or where it is judged that a high likelihood for their presence exists.
- 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.

Classification of mineral deposits in western San Diego County was compiled in the California Division of Mines and Geology Special Report 153 (California Department of Conservation 1982). These areas were then considered for designation as MRZs. The project site lies within the western San Diego County Production Consumption Region (P-C Region), as identified in CDMG Special Report 153.

This report has not designated any areas as MRZ-1 or MRZ-4 within Pacific Highlands Ranch. Virtually the entire subarea is designated MRZ-3 except for approximately 116 acres designated as MRZ-2 (Figure 4I-2). Areas classified as MRZ-3 are those



Source: Calif. Department of Conservation, Division of Mines and Geology, 1982

FIGURE 4I-2
Mineral Resource Zones

containing mineral deposits, the significance of which cannot be evaluated from available data.

The MRZ-3 deposits within Pacific Highlands Ranch which are most likely to have an economic importance are the alluvial deposits located in Gonzales, McGonigle, and Deer Canyons.

The MRZ-2 land in Pacific Highlands Ranch is mapped on the Stadium Conglomerate formation along Santa Monica Ridge in the southeast and on the ridge south of Deer Canyon (see Figure 4I-2). These MRZ-2 areas are part of a larger MRZ-2 area designated as Sector J(5) of the Kearny Mesa–Mission Valley Resource Area (California Department of Conservation 1982). Sector J of the Kearny Mesa–Mission Valley Resource Area encompasses about 34,961 acres of Eocene conglomerate which is of commercial value for aggregate.

Aggregate producers in Sector J must blend the coarse aggregate with sand from other deposits or crushed coarse material to make PCC aggregate. Without extensive processing, only the coarse fraction of the conglomerate deposits can be used in PCC aggregate. Consequently, most of the remaining finer material is discarded, giving a waste factor of up to 40 percent. Thickness of the deposits vary from a few tens of feet along the west margin, in the vicinity of Pacific Highlands Ranch, to over 500 feet in the eastern area of the sector. A resource of 5,810 million tons underlines Sector J, almost all (5,780 million tons) consisting of coarse aggregate.

The conservation element of the County of San Diego General Plan identifies the region of the county with the largest quantity of aggregate deposits and the greatest market for construction-quality aggregate as the metropolitan market area, which is the area located south of the San Dieguito River and west of the Laguna Mountains (County of San Diego 1990). In western San Diego County there are a minimum of 21 aggregate resource areas suitable for the extraction of sand, gravel, and rock.

According to CDMG Report 153, the western San Diego County P-C Region is facing a 330-million-ton deficit of aggregate to supply the entire region through the year 2030. Based on a total projected PCC aggregate demand of 360 million tons and assuming that all PCC quality material will be used only for PCC aggregate material, there is an anticipated 60-million-ton deficit of PCC aggregate through 2030.

Natural Resources

1. Would implementation of the Pacific Highlands Ranch Plan result in the conversion of agricultural land to nonagricultural uses or impairment of existing agricultural productivity?
2. Would implementation of the project result in the prevention of future extraction of sand and gravel and/or mineral resources?

1) Issue

Would implementation of the Pacific Highlands Ranch Plan result in the conversion of agricultural land to nonagricultural uses or impairment of existing agricultural productivity?

Impacts

Subarea Plans 1 and 2. Implementation of the proposed Pacific Highlands Ranch Plans would change the predominant existing land use in Pacific Highlands Ranch from agriculture to residential, commercial, and MSCP open space. The loss of farmland due to development and the preservation of open space for habitat protection associated with the MSCP open space preserve would preclude farming on approximately 136 acres of Prime Farmland in McGonigle and Deer Canyons. Open space preservation would also preclude farming on Farmlands of Local Importance and Grazing Land located in the upper reaches of Gonzales Canyon.

Significance of Impacts

As described in the NCFUA Framework Plan EIR, the direct impacts to prime agricultural resources on the project site from open space preservation and development are considered significant. The incremental loss of land being used for agriculture is also considered a significant cumulative impact and is identified as such in Chapter 6 of this MEIR.

Mitigation, Monitoring, and Reporting

Only implementation of the No Project alternative would reduce the identified agricultural resources impact associated with potential future development to below a level of significance.

2) Issue

Would implementation of the project result in the prevention of future extraction of sand and gravel and/or mineral resources?

Impacts

There are no existing mining operations within Pacific Highlands Ranch which would be replaced during implementation of the Pacific Highlands Ranch Plan.

The majority of Pacific Highlands Ranch is designated an MRZ-3 zone. Therefore, development of the project would not result in significant natural resources impacts in those areas.

However, there are approximately 116 acres of designated MRZ-2 zone lands in the southeast corner of the subarea. As indicated above, these deposits are identified as a source of PCC aggregate. The MRZ-2 project areas, which include Santa Monica Ridge and the ridgeline south of Deer Canyon, are proposed as open space within the MSCP areas of the project. This would preclude mineral extraction, which is considered an incompatible use within the MSCP.

Significance of Impacts

The loss of the potential for recovery of mineral resources from mineral resource zones classified by the State as significant (MRZ-2) has the potential to be a significant, long-term impact. However, there is no history of mining activity in Pacific Highlands Ranch and no known sensitive mineral resources in Pacific Highlands Ranch would be excavated and removed or covered with development as part of plan implementation. Rather, they would be retained in perpetuity as open space areas. Therefore, no potentially significant direct impacts are anticipated. However, the potential exists for significant cumulative impacts.

Mitigation, Monitoring, and Reporting

No mitigation of direct impacts would be required. Only the No Project alternative would avoid potential cumulative significant natural resource impacts.

J. Paleontological Resources

The potential for paleontological resources within Pacific Highlands Ranch was determined using the geologic formations map (see Figure 4H-1) and a review of published geologic reports, new field data collected since 1979 by the San Diego Natural History Museum and paleontological locality maps as presented by Deméré and Walsh (1994). This report is used by the City of San Diego to determine the potential for fossil remains within given geologic formations and the respective sensitivity of those fossil remains.

Existing Conditions

Paleontology is defined as a science dealing with the life of past geologic periods as known from fossil remains. Paleontological resources (fossils) are the remains and/or traces of prehistoric animal and plant life exclusive of human remains or artifacts. Fossil remains such as bones, teeth, shells, leaves, and so on, are found in the geologic deposits (rock formations) within which they were originally buried. Fossil remains are important as they provide indicators of the Earth's chronology and history. They represent a limited, nonrenewable, and sensitive scientific and educational resource.

The potential for fossil remains at a given location can be predicted through previous correlations that have been established between the fossil occurrence and the geologic formations within which they are entombed. Geologic formations possess a specific paleontological resource potential wherever the formation occurs based on discoveries made elsewhere in that particular formation.

To evaluate paleontological resources in Pacific Highlands Ranch, the presence and distribution of geologic formations and the respective potential for paleontological resources were reviewed. The following is a summary of the research conducted for the project site and associated conclusions for paleontological resource potential.

The project site is located within the Coastal Plain Province, which is underlain by a "layer cake" sequence of marine and nonmarine sedimentary rock units that record portions of the last 140 million years of earth history. Over this period of time the relationship of land and sea has fluctuated drastically such that today we have ancient marine rocks preserved up to elevations around 900 feet above sea level and ancient river deposits as high as 1,200 feet. Sedimentary rocks of the Late Cretaceous, Eocene, Pliocene, Pleistocene, and Holocene age underlie the general vicinity of the project area.

Although few fossil remains have been found in the project area because of a lack of intense development, mammal, molluscan, calcareous nannoplankton, flora, and

foraminifera from the formations similar to those within the subarea have been collected generally west of I-5 and south of Carroll Canyon Road and Sorrento Valley Road.

Additionally, the City has identified at least six sites containing paleontological resources either within or adjacent to the NCFUA (NCFUA Plan EIR). These sites are listed on Table 4J-1; relevant maps are on file with the City's Development Services Business Center. These sites have been typically encountered during grading/excavation for specific projects.

TABLE 4J-1
KNOWN PALEONTOLOGICAL SITES WITHIN OR ADJACENT TO THE
NCFUA

Site No.	General Location	Formation or Deposit
2853, 2987	Outside of NCFUA, mouth of Carmel Valley	Boundary of alluvial deposits and outcropping of Bay Point Formation
3170	Just north of Los Peñasquitos Canyon, at about elevation 180 feet	Santiago Peak Volcanics
3269	Outside NCFUA, just north of Del Mar Heights Road and just east of El Camino Real	Friars Formation
3282	Just south of NCFUA, between Del Mar Heights Road and Gonzales Canyon	Mission Valley Formation
3284	Outside of NCFUA, in Carmel Valley, north and east of intersection with Shaw Valley	Alluvial deposits

SOURCES: City of San Diego Development Services Business Center, "Areas within the City of San Diego Which Have Paleontological Significance."

Additionally, there are a number of formations within Pacific Highlands Ranch that have the potential to contain significant paleontological resources. These include five Eocene sedimentary formations—Torrey Sandstone, Scripps Formation, Friars Formation, Stadium Conglomerate, and Mission Valley Formation—and five Quaternary units—Lindavista Formation, Bay Point Formation, river terrace deposits, alluvium, and colluvium. Each of these formations has been evaluated for its paleontological resource potential and given a rating from high to low sensitivity (Table 4J-2) based on the following criteria (PaleoServices 1991).

- **High Sensitivity** - These formations contain a large number of known fossil localities. Generally speaking, highly sensitive formations produce vertebrate fossil remains or are considered to have the potential to produce such remains.
- **Moderate Sensitivity** - These formations have a moderate number of known fossil localities. Generally speaking, moderately sensitive formations produce invertebrate fossil remains in high abundance or vertebrate fossil remains in low abundance.
- **Low and/or Unknown Sensitivity** - These formations contain only a small number of known fossil localities and typically produce invertebrate fossil remains in low abundance. Unknown sensitivity is assigned to formations from which there are presently no known paleontological resources but which have the potential for producing such remains based on their sedimentary origin.
- **Very Low Sensitivity** - Very low sensitivity is assigned to geologic formations that, based on their relative youthful age and/or high-energy depositional history, are judged to be unlikely to produce any fossil remains.

The paleontological resource potential for each formation identified within Pacific Highlands Ranch is taken from Deméré and Walsh (1994) and is discussed below.

a) Torrey Sandstone (Tt)

The Torrey Sandstone consists primarily of yellowish white, coarse-grained, locally cross-bedded, arkosic sandstones. The Torrey Sandstone has produced important remains of fossil plants and marine invertebrates. The plant remains (mostly leaves) are especially significant because many are from taxa that would suggest that the Eocene climate in this area was warmer and wetter than the modern climate. Invertebrate fossils known from the Torrey Sandstone primarily consist of nearshore marine taxa (e.g., clams, oysters, snails, and barnacles). Vertebrate fossil remains are rare and include teeth of crocodiles, sharks, and rays.

The coarse-grained nature of the Torrey Sandstone and the generally poor state of preservation of contained fossils supports a moderate paleontological resource sensitivity rank.

Torrey Sandstone occurs primarily in the westernmost portion of the subarea on the slopes along Gonzales Canyon. A small area of Torrey Sandstone also occurs on the southwestern corner of the subarea.

**TABLE 4J-2
PALEONTOLOGICAL RESOURCES POTENTIAL**

Geologic Formation	Paleontological Resources Sensitivity Rank
Torrey Sandstone (Tt)	Moderate
Scripps Formation (Tsc)	High
Friars Formation (Tf)	High
Stadium Conglomerate (Tst)	High
Mission Valley Formation (Tmv)	High
Lindavista (Qln)	Moderate
Bay Point Formation (Qbp)	High
Terrace Deposits (Qt)	Low
Alluvium (Qal)	Low
Colluvium (Qcol)	High

b) Scripps Formation (Tsc)

The Scripps Formation consists of interbedded layers of claystones, siltstones, and sandstones, with some cobble conglomerate. The Scripps Formation is considered to be potentially fossiliferous almost everywhere it occurs. Most of the fossils known from this formation consist of remains of marine organisms including clams, snails, crabs, sharks, rays, and bony fishes. However, remains of fossil reptiles (e.g., crocodile and turtle) and land mammals (e.g., Uintatherium, Brontotherium, rhinoceros, and artiodactyl) have also been recovered from the formation. Well-preserved pieces of fossil wood have also been recovered from the Scripps Formation.

Based on the joint occurrence of marine invertebrate fossils and terrestrial vertebrates, the Scripps Formation is assigned a high paleontological sensitivity. There is only a small outcropping of Scripps Formation in the extreme southwestern corner of the subarea.

c) Friars Formation (Tf)

The Friars Formation is the uppermost (i.e., youngest) formation in the La Jolla Group. The Friars Formation consists mainly of light gray, medium-grained sandstones; greenish, reddish, and brown siltstones and mudstones; and common lenses of cobble conglomerate. The Friars Formation is rich in vertebrate fossils, especially terrestrial mammals such as opossums, insectivores, primates, rodents, artiodactyls, and perissodactyls. Also reported from the Friars Formation are well-preserved remains of marine microfossils and macroinvertebrates. Remains of fossil leaves have also been recovered from the Friars Formation.

Based on the recovery of diverse and well-preserved fossil assemblages of both marine invertebrates and terrestrial vertebrates, the Friars Formation is assigned a high paleontological resource sensitivity. The Friars Formation occurs throughout the subarea on the slopes surrounding Deer, McGonigle, Gonzales, and La Zanja Canyons.

d) Stadium Conglomerate (Tst)

The Stadium Conglomerate is the lowermost formation of the Poway Group. The lower member of the Stadium Conglomerate, which occurs on-site, is composed of light green-gray, poorly sorted cobble conglomerate with a muddy to sandy matrix. In Mission Valley, sparse marine fossil remains occur near the base of the lower member of the Stadium Conglomerate. Exposures of the lower member at Scripps Ranch are primarily nonmarine and have produced well-preserved remains of land mammals including opossums, insectivores, primates, rodents, carnivores, and artiodactyls. The majority of the fossils recovered from the lower member were found in either claystone rip-up clasts or in the sandy matrix characteristic of certain channel-fill deposits in this rock unit.

The lower member of the Stadium Conglomerate has produced moderately diverse assemblages of terrestrial mammals and is assigned a high paleontological resource sensitivity. Stadium Conglomerate occurs near the tops of the mesas in the central and northern portions of the subarea and on the tops of Santa Monica Ridge and the ridge separating McGonigle and Deer Canyons.

e) Mission Valley Formation (Tmv)

The Mission Valley Formation consists of light gray, fine-grained marine sandstones. The marine strata of the Mission Valley Formation have produced abundant and generally well-preserved remains of marine microfossils (e.g., foraminifers), macroinvertebrates (e.g., clams, snails, crustaceans, and sea urchins), and vertebrates (e.g., sharks, rays, and bony fish).

Fluvial strata of the Mission Valley Formation have produced well-preserved examples of petrified wood and fairly large and diverse assemblages of fossil land mammals including opossums, insectivores, bats, primates, rodents, artiodactyls, and perissodactyls. The co-occurrence in the Mission Valley Formation of land mammal assemblages with assemblages of marine microfossils, mollusks, and vertebrates is extremely important as it allows for the direct correlation of terrestrial and marine faunal time scales.

The Mission Valley Formation represents one of the few instances in North America where such comparisons are possible. The Mission Valley Formation has produced diverse fossil assemblages of both marine invertebrates and terrestrial vertebrates and is assigned a high paleontological resource sensitivity. The Mission Valley Formation occurs extensively throughout the central and northern portions of Pacific Highlands Ranch. This is the predominant formation found on-site.

f) Lindavista Formation (Qln)

The Lindavista Formation represents a marine or nonmarine terrace deposit of early Pleistocene age (approximately 0.5-1.5 million years ago). Typical exposures of the formation consist of rust red, coarse-grained, pebbly sandstones and pebble conglomerates with locally common deposits of green claystone. Fossil localities are rare in the Lindavista Formation (e.g., Tierrasanta and Mira Mesa). Fossils collected from these sites consist of remains of nearshore marine invertebrates including clams, scallops, snails, barnacles, and sand dollars, as well as sparse remains of sharks and baleen whales.

Based on the scarcity of fossils (primarily marine invertebrates) reported from this rock unit, the Lindavista Formation is assigned a moderate paleontological resource sensitivity. Pockets of Lindavista Formation occur primarily along the northern boundary of Pacific Highlands Ranch, with some occurrences south of Deer Canyon.

g) Bay Point Formation (Qbp)

The Bay Point Formation is a nearshore marine sedimentary deposit of late Pleistocene age (approximately 220,000 year old). Typical exposures consist of light gray, friable to partially cemented, fine- to coarse-grained, massive and cross-bedded sandstones. The Bay Point Formation has produced large and diverse assemblages of well-preserved marine invertebrate fossils, primarily mollusks. However, remains of fossil marine vertebrates (i.e., sharks, rays, and bony fishes) have also been recovered from this rock unit.

Based upon the occurrence of extremely diverse and well-preserved assemblages of marine invertebrate fossils and rare vertebrate fossils in the Bay Point Formation, it is assigned a high resource sensitivity. The Bay Point Formation only occurs in the extreme northwest portion of Pacific Highlands Ranch.

h) Terrace Deposits (Qt)

Deposits of coarse-grained, gravelly sandstones, pebble and cobble conglomerates, and claystones occur along the margins of many of the larger coastal valleys. Fossils have been collected from river terrace deposits at several location in coastal San Diego County. These locations include the south side of Sweetwater Valley, where fluvial sandstones and siltstones have produced well-preserved remains of pond turtle, passenger pigeon, hawk, mole, gopher, squirrel, rabbit, and horse; the South Bay Freeway (SR-54), where fluvial siltstones have yielded a diverse assemblage of "Ice Age" mammals (ground sloth, shrew, mole, mice, wolf, camel, deer, horse, mastodon, and mammoth); and San Dieguito Valley (in Fairbanks Highlands, just north of Pacific Highlands Ranch), where fluvial sandstones have produced well-preserved remains of ground sloth. All of these important sites have been discovered in construction-related excavations.

The general coarse-grained nature of these deposits coupled with the paucity of known fossil occurrences might suggest a low paleontological resource sensitivity. However, the fact that important vertebrate remains have been collected from several sites indicates that potentially significant sites may be encountered elsewhere, and thus, a moderate resource sensitivity is assigned. Terrace deposits occur within Pacific Highlands Ranch along the northern side of Gonzales Canyon and near the mouth of McGonigle Canyon.

i) Alluvium (Qal)

Flooding the modern drainages are poorly consolidated alluvial sediments of relatively recent age (i.e., younger than 10,000 years old). Lithologies consist of poorly consolidated clays, silts, sands, and gravel. Fossils are generally unknown from the later Quaternary alluvial deposits in the Coastal Plain Province. There are three notable exceptions. Teeth and limb bones of a mammoth were found in floodplain deposits of the Tijuana River valley, a single mammoth tusk was found in alluvial deposits in the

southwestern portion of El Cajon Valley, and a mammoth femur was recovered from alluvial deposits in the Santa Margarita River channel at the south end of the Camp Pendleton Marine Corps Base.

Because of their young age, later Quaternary alluvial deposits in San Diego County are assigned a low paleontological resource sensitivity. Alluvial deposits within Pacific Highlands Ranch occur in the bottoms of Gonzales, McGonigle, and Deer Canyons.

j) Colluvium (Qcol)

Colluvial materials located within Pacific Highlands Ranch consist of silty sands to sandy clays with cobble-sized rock fragments and have an estimated maximum thickness of 10 to 15 feet in some areas. Deposits of colluvial materials are found within many of the secondary drainages on the project site. The resource potential for colluvial deposits is assumed to be the same as the formations from which the deposits originated and therefore have the same designations.

Paleontological Resources Issue

1. To what extent would implementation of the Pacific Highlands Ranch Plan result in the loss of paleontological resources?

1) Issue

To what extent would implementation of the Pacific Highlands Ranch Plan result in the loss of paleontological resources?

Impacts

Impacts to paleontological resources occur when earthwork activities cut into geological formations within which fossils are located and result in the physical destruction of the fossils. The limitations of field surveys to identify impacts prevent a precise determination of the potential for significant fossil finds in the project area prior to grading. In general, however, there is a high potential for such finds in large portions of the project site.

The majority of the development is proposed for the mesa tops north of McGonigle Canyon. These areas primarily consist of Mission Valley Formation deposits which have a high potential for paleontological resources. Additionally, as discussed above, all other formations on-site with the exception of the alluvial deposits are assigned a moderate to

high potential for paleontological resources. Therefore, implementation of the Pacific Highlands Ranch Plan has the potential to expose paleontological formations.

Significance of Impacts

The potential for significant fossils to occur in the formations of the subarea plan is moderate to high in all areas planned for development of the Pacific Highlands Ranch Plan; therefore, the grading necessary to implement the subarea plan could result in significant impacts to paleontological resources.

Mitigation, Monitoring, and Reporting

The Pacific Highlands Ranch Plan would require that all future tentative maps and VTMs approved include a condition for the implementation of a monitoring and salvage program for the recovery of paleontological resources during development. This program would reduce potential impacts to paleontological resources to below a level of significance and shall include the following steps:

- a. Prior to any grading activities and/or the issuance of permits, the applicant shall provide a letter of verification to the Environmental Review Manager of the Land Development Review Division (LDR) stating that a qualified paleontologist and/or paleontological monitor have been retained to implement the paleontological monitoring program. The requirement for monitoring shall be noted on grading plans. All persons involved in the paleontological monitoring of grading activities shall be approved by LDR.
- b. The qualified paleontologist or paleontological monitor shall attend any preconstruction/pregrading meetings to consult with the excavation contractor.
- c. The paleontologist or paleontological monitor shall be on-site full time during excavation into previously undisturbed formations. The monitoring time may be decreased at the discretion of the paleontologist in consultation with LDR, depending on the rate of excavation, the materials excavated, and the abundance of fossils.
- d. If fossils are encountered, the paleontologist shall have the authority to divert or temporarily halt construction activities in the area of discovery to allow recovery of fossil remains. The paleontologist shall contact LDR at the time of discovery. LDR shall concur with the salvaging methods before construction activities are allowed to resume.
- e. The qualified paleontologist shall be responsible for preparation of fossils to a point of identification as defined in the City of San Diego Paleontological Guidelines, and

submittal of a letter of acceptance from a local qualified curation facility. The paleontologist shall record any discovered fossil sites at the San Diego Natural History Museum.

- f. The qualified paleontologist shall be responsible for the preparation of a monitoring results report with appropriate graphics summarizing the results (even if negative), analyses, and conclusions of the above program. The report shall be submitted to LDR prior to the issuance of building permits and/or certificates of occupancy. If building plans are not required, the paleontologist shall submit the report to LDR within three months following the termination of the monitoring program.

Prior to subarea plan approval, the Development Services Business Center shall verify that the above mitigation measures are incorporated in appropriate sections of the subarea plan. These measures shall be conditions of subsequent tentative maps and VTMs and development proposals.

K. Noise

The discussion below is based on the noise technical report prepared for the proposed Pacific Highlands Ranch Plan. This report can be found in Appendix E of this MEIR. Existing and future noise predictions for the subarea plan were based on the traffic information contained in the traffic technical report which can be found in Appendix B of this MEIR.

Existing Conditions

Existing land uses on-site include nursery operations, commercial agriculture, large lot single-family residences, and horse ranches with associated equestrian activities. The nursery operations are mainly located along Black Mountain Road and grow flowers, palms, and other plants for landscaping purposes. The main agricultural commodity in the project area is pole tomatoes.

Most of the tomato farming takes place on the upland mesas north of Gonzales Canyon. Equestrian activities take place on two horse ranches located on the western end of Gonzales Canyon and in the southeastern corner of the project area. There are 10 existing single-family residences within the project area as well as the 29-unit Rancho Glen Estates subdivision located along Caminito Mendiola in the eastern portion of the site. Most of the remaining area in the southeastern end of the site is currently undeveloped open space.

A north-south San Diego Gas & Electric (SDG&E) power line easement containing a high-power overhead electrical distribution line extends along the eastern boundary. Also, a main water line and two trunk sewer lines traverse the site. The remaining on-site acreage includes roads and open space, much of which is in a disturbed condition.

The CNEL is a 24-hour A-weighted decibel average sound level [dB(A) L_{eq}] from midnight to midnight obtained after the addition of 5 dB to sound levels occurring between 7:00 P.M. and 10:00 P.M. and 10 dB to the sound levels occurring between 10:00 P.M. and 7:00 A.M. A-weighting is a frequency correction that often correlates well with the subjective response of humans to noise. The 5 dB and 10 dB penalties added to the evening and nighttime hours account for the added sensitivity of humans to noise during these time periods.

Currently, the most heavily traveled roadways within the subarea are Black Mountain Road and Carmel Valley Road with an average daily traffic volume of approximately 3,000 trips on each. Current estimated noise levels along these roadways are

approximately 60 CNEL at 50 feet from the roadway centerlines. Noise levels along the other roadways within the subarea are lower.

Away from the roadways, existing noise levels are low in accordance with the rural nature of the area.

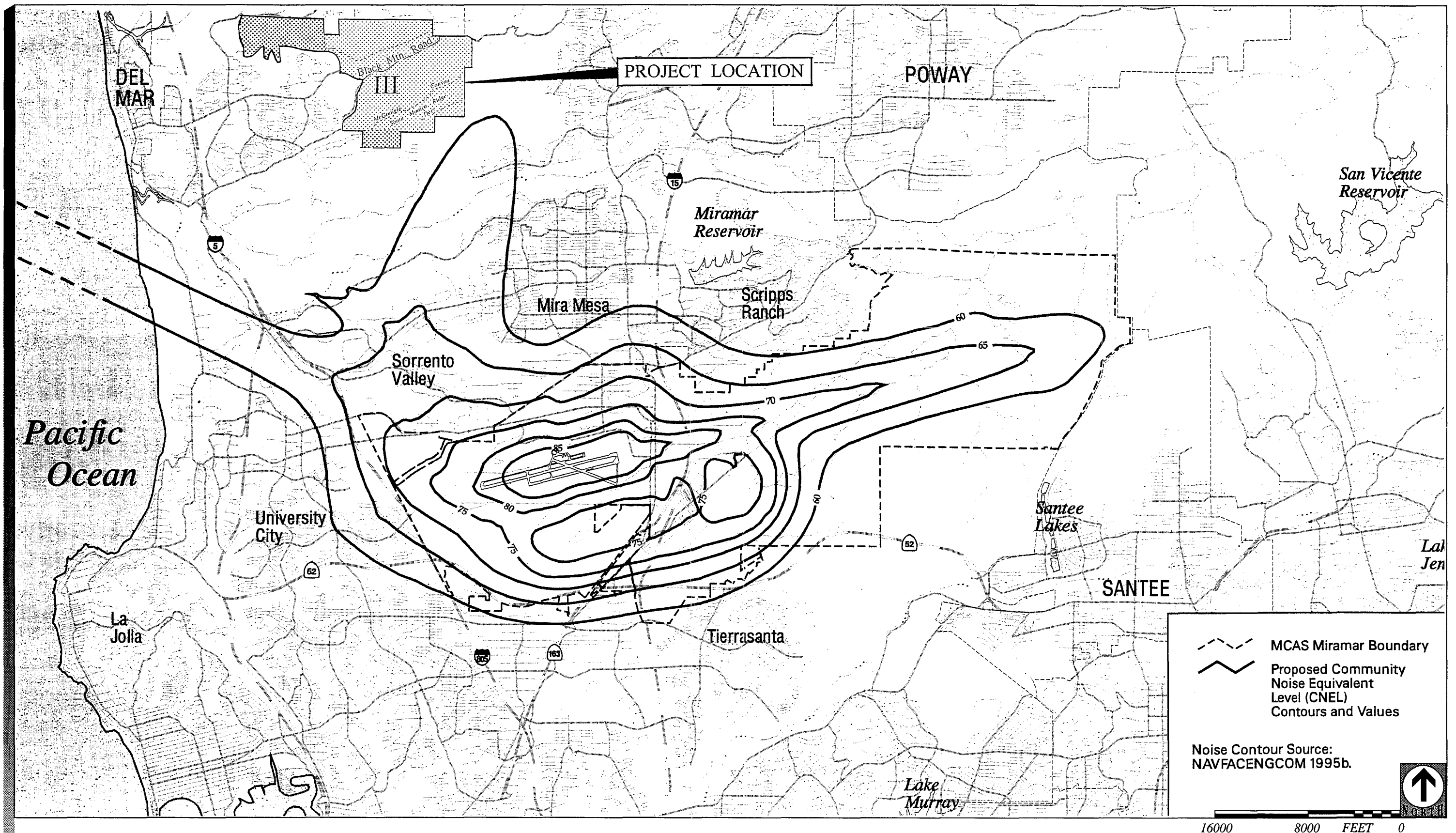
Marine Corps Air Station (MCAS) Miramar lies approximately seven miles to the southwest of the project site. Currently, aircraft from MCAS Miramar operate in the vicinity of the project. Fixed-wing aircraft (e.g., F/A-18s) departing from the base using the Julian Departure Corridor pass along the eastern boundary of the Pacific Highlands Ranch plan area. In the near future, rotary-wing aircraft (helicopters) arriving within the Racetrack Corridor will pass directly over the Pacific Highlands Ranch plan area.

The Comprehensive Land Use Plan originally developed for the base indicates that currently the Pacific Highlands Ranch plan area lies just outside the 60 CNEL contour (SANDAG 1992). The Final Environmental Impact Statement (EIS) for the realignment of the base from Naval Air Station (NAS) Miramar to MCAS Miramar also indicates that the project site currently lies outside the 60 CNEL contour (Ogden Environmental & Energy Services 1996).

The Final EIS for the base realignment indicates that once the transfer of the base to the Marine Corps has been completed, future aircraft operations will result in a slight shift in the 60 CNEL noise contour to the northeast in the vicinity of the project site (Ogden Environmental & Energy Services 1996). Therefore, although the 60 CNEL contour will shift somewhat closer to the project's southeastern boundary with the realignment of NAS Miramar to MCAS Miramar, it is anticipated that noise impacts to the Pacific Highlands Ranch plan area will remain outside of the 60 CNEL noise exposure levels, well below the City's exterior standard of 65 CNEL for residential land uses (Figure 4K-1).

Although helicopters passing over and near the Pacific Highlands Ranch plan area will not violate City noise standards, they do have the potential of being perceived as "nuisance noise" for intermittent periods of time by some residents. The severity of the nuisance noise is generally a subjective response for each individual affected.

The Miramar EIS indicates an average of five helicopter operations per day over the Pacific Highlands Ranch plan area utilizing the Racetrack Corridor. Helicopters will be flying at 4,000 feet MSL or above on arrivals. Therefore, although the helicopters are not anticipated to violate the applicable noise standards, they could be perceived as a nuisance by some residents within the Pacific Highlands Ranch project. These impacts may be more evident for residents in the higher elevations of the project than those at the lower elevations.



Source: United States Marine Corps 1995

FIGURE 4K-1
Relation of Proposed Project to
Proposed Noise Contours at MCAS Miramar

Additionally, approximately 83 F/A-18 operations will depart the base utilizing the Julian Departure Corridor. These aircraft departures will be most noticeable to residents in the eastern portion of the site. Therefore, it is advised that all future homeowners be advised using a disclosure statement such as the following:

The development (within Subarea III) is located within the Racetrack Corridor and near the Julian Departure Corridor used by fixed-wing aircraft departing from Marine Corps Air Station (MCAS) Miramar. While this development is considered compatible with these air operations, occupants will occasionally experience varying degrees of noise and vibration. Miramar normally operates between 7:00 A.M. and Midnight Monday through Thursday, 7:00 A.M. to 6:00 P.M. Friday, and 8:00 A.M. until 6:00 P.M. on weekends and holidays. However, as a master jet base, MCAS Miramar may operate 24 hours per day, seven days per week. Therefore, on occasions operations may be on a 24-hour basis.

Noise Issues

1. Would existing or future noise levels resulting from the proposed project adversely impact sensitive noise receptors in and around the project area?

1) Issue

Would existing or future noise levels resulting from the proposed project adversely impact sensitive noise receptors in and around the project area?

Impact

The General Plan of the City of San Diego establishes exterior noise standards in maximum CNELs. For residential areas, schools, libraries, and park sites, the standard is 65 CNEL. Additionally, the City's exterior noise level standard for professional and office buildings is 70 CNEL. The exterior noise level standard for commercial retail, wholesale, shopping centers, industrial manufacturing, and so on is 75 CNEL. However, there are no exterior noise standards for commercial land uses by zoning designation.

Typically, exterior usable areas are considered backyards and recreational areas in residential developments, and outdoor dining and passive recreational areas in commercial/industrial developments. Often these areas can be shielded from noise by locating buildings between those areas and the noise source. However, at this level of planning exterior usable areas cannot be determined. Therefore, the potential for significant noise impacts is evaluated based on the proximity of proposed land uses to the circulation element roadways.

The City of San Diego assumes that standard construction techniques will provide a 15-decibel reduction of exterior noise levels to an interior receiver. With these criteria, standard construction could be assumed to result in interior noise levels of 45 CNEL when exterior sources are 60 CNEL or less. When exterior noise levels are greater than 60 CNEL, consideration of specific construction techniques is required.

The noise analyses, based on future projected ADT, were conducted in accordance with the City's Acoustical Report Guidelines.

The Federal Highway Administration (FHWA) Noise Prediction Model (FHWA 1979), with California Vehicle Noise Emission (Calveno) Levels (California Department of Transportation 1983), was used to estimate existing and future traffic noise in the Pacific Highlands Ranch plan area. The FHWA model takes into account traffic mix, speed, and volume; roadway gradient; relative distances between sources, barriers, and receivers; and shielding provided by intervening terrain or structures.

Due to the limited grading detail available at this level of project planning, the analysis of the future noise environment considered a worst-case condition to identify potential noise impact areas. For this condition, topography was considered flat with no intervening terrain between proposed sensitive land uses and the roadways. Additionally, hard-site conditions were assumed. Hard sites have an attenuation of 3 dB for every doubling of distance from a line source, such as a roadway.

The improved roads which currently exist on-site are Black Mountain Road, which essentially runs the entire east-west length of the southern portion of the site, Carmel Valley Road, Rancho Santa Fe Farms Road, and Caminito Mendiola. The existing western segment of SR-56 currently terminates at Carmel Valley Road in the southwestern corner of the site.

Existing traffic volumes for these roadways were obtained from the traffic report prepared for the proposed project and from SANDAG (Urban Systems Associates 1997; SANDAG 1997a). Both Black Mountain Road and Carmel Valley Road currently carry approximately 3,000 ADT on-site. Rancho Santa Fe Farms Road carries approximately 2,000 ADT and Caminito Mendiola carries less than 1,000 ADT.

On-site Black Mountain Road east of existing Carmel Valley Road will be renamed Carmel Valley Road and is proposed as a four-lane Major throughout the project site. Additionally, the on-site portion of Black Mountain Road west of Carmel Valley Road will be renamed Del Mar Heights Road and improved to a six-lane Prime. Rancho Santa Fe Farms Road will be improved, but will remain a two-lane Collector. No roadway improvements are proposed for Caminito Mendiola.

Only two new circulation element roads will be built on-site. The first is Camino Santa Fe which is proposed as a six-lane Major between Del Mar Heights Road and SR-56, and as a four-lane Major south of SR-56. The other roadway is SR-56. The ultimate configuration of SR-56 through the project site is as a six-lane freeway composed of three mixed-flow lanes each direction. As indicated previously, there are two proposed alignments for SR-56 through the site which are considered in this analysis.

Future average daily traffic volumes for the major roadways on and near the project site were obtained from the traffic report prepared for the project. Table 4K-1 shows these future buildout ADTs which are the volumes projected to occur upon buildout of the region and represent a worst-case scenario for the two interchange SR-56 alignment "F" scenario. Table 4K-2 shows this information for the three interchange SR-56 alignment "F" scenario, while Table 4K-3 shows this information for the SR-56 alignment "D" scenario. The resulting traffic-generated noise levels are relatively insensitive to changes in the traffic volume. For example, a 25-percent increase in traffic volume would only result in a 1-decibel increase in noise levels.

Traffic speed, mixes, and daytime/evening/night distributions used in the analysis are also listed in Tables 4K-1, 4K-2, and 4K-3. Traffic speeds were based on the minimum design speeds for the roadways obtained from the City's Street Design Standards. Posted speeds are normally 5-10 miles per hour (mph) less than the minimum design speed. Additionally, according to the traffic report prepared for the project, all on-site roadways are expected to operate at level of service C or better (Urban Systems Associates 1997). Therefore, conservative speeds of 5 mph less than the minimum design speeds were chosen for the circulation element roadways.

The traffic mix used in the model for all roadways except for SR-56, Caminito Santa Fe south of SR-56 (alignment "F" - three interchange scenario), and the Third Interchange Road south of SR-56 was based on the mix for truck routes used in the City of Carlsbad (City of Carlsbad 1993). The traffic mix used for Camino Santa Fe (alignment "D" and alignment "F" - two interchange option) and the Third Interchange Road south of SR-56 was based on the mix for nontruck routes used in the City of Carlsbad. These mixes were developed through field surveys of routes in Carlsbad, the nearest city from which this detailed information is available.

Since SR-56 is currently under construction, detailed truck mix data is not available for this roadway. Therefore, the mix for SR-56 was based on the percentages of trucks recorded in 1995 on SR-52 south of the project site (California Department of Transportation 1996). SR-52 is the nearest east/west-trending freeway for which this information is available.

The traffic day/evening/night distribution for the major roadways was assumed to be 77 percent daytime, 10 percent evening, and 13 percent nighttime, except for those roadways

TABLE 4K-1
FUTURE TRAFFIC PARAMETERS—ALIGNMENT “F” ALTERNATIVE

Roadway	Segment	Volume (ADT)	Classification	Speed (mph)	Mix*	Distribution†
SR-56	Carmel Country Road/Camino Santa Fe	102,300	Freeway	65	96.7-2.2-1.1	77-10-13
SR-56	Camino Santa Fe/Camino Ruiz	90,600	Freeway	65	96.7-2.2-1.1	77-10-13
Camino Santa Fe	Del Mar Heights Road to SR-56	19,900	6 Lane Major	50	95.3-3.5-1.2	77-10-13
Camino Santa Fe	South of SR-56	6,600	4 Lane Major	50	97.9-1.8-0.3	77-15-8
Carmel Valley Road	Del Mar Heights Road/Rancho Santa Fe Farms Road	26,000	4 Lane Major	50	95.3-3.5-1.2	77-10-13
Carmel Valley Road	Rancho Santa Fe Farms Road/Camino Ruiz	19,600	4 Lane Major	50	95.3-3.5-1.2	77-10-13
Del Mar Heights Road	Lansdale East to Camino Santa Fe	19,600	6 Lane Prime	55	95.3-3.5-1.2	77-10-13

*xx-xx-xx = percent autos-medium trucks-heavy trucks

†xx-xx-xx = percent ADT traveling during the daytime-evening-nighttime hours

TABLE 4K-2
FUTURE TRAFFIC PARAMETERS—ALIGNMENT “F” ALTERNATIVE

Roadway	Segment	Volume (ADT)	Classification	Speed (mph)	Mix*	Distribution†
SR-56	Carmel Country Road/Camino Santa Fe	92,800	Freeway	65	96.7-2.2-1.1	77-10-13
SR-56	Camino Santa Fe/Third Interchange	89,000	Freeway	65	96.7-2.2-1.1	77-10-13
SR-56	Third Interchange/Camino Ruiz	84,100	Freeway	65	96.7-2.2-1.1	77-10-13
Camino Santa Fe	Del Mar Heights Road to SR-56	23,000	6 Lane Major	50	95.3-3.5-1.2	77-10-13
Camino Santa Fe	South of SR-56	6,300	4 Lane Major	50	97.9-1.8-0.3	77-15-8
Carmel Valley Road	Del Mar Heights Road/Rancho Santa Fe Farms Road	16,300	4 Lane Major	50	95.3-3.5-1.2	77-10-13
Carmel Valley Road	Rancho Santa Fe Farms Road/Camino Ruiz	23,100	4 Lane Major	50	95.3-3.5-1.2	77-10-13
Del Mar Heights Road	Lansdale East to Camino Santa Fe	23,600	6 Lane Prime	55	95.3-3.5-1.2	77-10-13
Third Interchange Road	Carmel Valley Road/SR-56	19,900	4 Lane Major	50	95.3-3.5-1.2	77-10-13

*xx-xx-xx = percent autos-medium trucks-heavy trucks

†xx-xx-xx = percent ADT traveling during the daytime-evening-nighttime hours

**TABLE 4K-3
FUTURE TRAFFIC PARAMETERS—ALIGNMENT “D”**

Roadway	Segment	Volume (ADT)	Classification	Speed (mph)	Mix*	Distribution†
SR-56	Carmel Country Road/Camino Santa Fe	95,000	Freeway	65	96.7-2.2-1.1	77-10-13
SR-56	Camino Santa Fe/Camino Ruiz	90,100	Freeway	65	96.7-2.2-1.1	77-10-13
Camino Santa Fe	Del Mar Heights Road to SR-56	24,500	6 Lane Major	50	95.3-3.5-1.2	77-10-13
Camino Santa Fe	South of SR-56	25,700	4 Lane Major	50	95.3-3.5-1.2	77-10-13
Carmel Valley Road	Del Mar Heights Road/Rancho Santa Fe Farms Road	20,200	4 Lane Major	50	95.3-3.5-1.2	77-10-13
Carmel Valley Road	Rancho Santa Fe Farms Road/Camino Ruiz	21,000	4 Lane Major	50	95.3-3.5-1.2	77-10-13
Del Mar Heights Road	Lansdale East to Camino Santa Fe	20,400	6 Lane Prime	55	95.3-3.5-1.2	77-10-13

*xx-xx-xx = percent autos-medium trucks-heavy trucks

†xx-xx-xx = percent ADT traveling during the daytime-evening-nighttime hours

which carry small daily volumes and are expected to only serve small residential areas. For those roadways, the traffic distribution was assumed to be 77 percent daytime, 15 percent evening, and 8 percent nighttime.

As indicated previously, due to the limited grading detail available at this level of planning, the analysis presented here represents worst-case, flat site conditions. The distances to the various noise contours from each roadway for the different Pacific Highlands Ranch plans are shown in Tables 4K-4, 4K-5, and 4K-6. As seen from these tables, without intervening topography, structures, or mitigation, noise generated by traffic on SR-56 would impact the majority of the site, with the 65 CNEL contour lying between approximately 2,500 and 3,000 feet from the freeway. However, intervening topography and future structures will limit this distance.

For the other major roadways within the project site, the 65 CNEL contour would range from approximately 300 to 400 feet from the centerline of the roadway. Except for land uses immediately adjacent to SR-56, noise levels are not anticipated to exceed 75 CNEL, with the 70 CNEL noise contour lying between approximately 100 and 130 feet from the centerlines of the major roadways.

Significance of Impacts

As indicated, noise levels are anticipated to exceed applicable standards for all residential uses immediately adjacent to SR-56 and the major roadways, as well as to proposed school and park uses. Noise levels could exceed 70 CNEL for professional and office building land uses depending on their placement relative to the roadways. Noise levels for commercial retail land uses are not expected to be exceeded unless they are located immediately adjacent to SR-56. Where noise levels exceed applicable exterior standards, noise impacts would be significant.

Mitigation, Monitoring, and Reporting

Mitigation of noise levels could be accomplished through the construction of noise barriers. However, due to the limited grading detail available at this stage of planning, it is not possible to determine specific barrier heights and locations.

The draft EIR prepared by the City for the middle section of SR-56 indicates that wall heights varying between 12 and 16 feet would be required to mitigate noise levels at existing residential uses (City of San Diego 1996b). Similar wall heights would be anticipated for future sensitive uses located along the SR-56 right-of-way within Pacific Highlands Ranch.

TABLE 4K-4
DISTANCE TO NOISE CONTOURS—ALIGNMENT “F” ALTERNATIVE

Roadway	Segment	Distance from Centerline to Contour (feet)*				
		80 CNEL	75 CNEL	70 CNEL	65 CNEL	60 CNEL
SR-56	Carmel Country Road/Camino Santa Fe	95	300	950	3,000	9,490
SR-56	Camino Santa Fe/Camino Ruiz	85	265	840	2,660	8,410
Camino Santa Fe	Del Mar Heights Road to SR-56	--	--	100	320	1,010
Camino Santa Fe	South of SR-56	--	--	--	75	240
Carmel Valley Road	Del Mar Heights Road/Rancho Santa Fe Farms Road	--	--	130	420	1,320
Carmel Valley Road	Rancho Santa Fe Farms Road/Camino Ruiz	--	--	100	315	995
Del Mar Heights Road	Lansdale East to Camino Santa Fe	--	--	100	315	995

*Distances less than 50 feet are not shown

TABLE 4K-5
DISTANCE TO NOISE CONTOURS - ALIGNMENT "F" ALTERNATIVE

Roadway	Segment	Distance from Centerline to Contour (feet)*				
		80 CNEL	75 CNEL	70 CNEL	65 CNEL	60 CNEL
SR-56	Carmel Country Road/Camino Santa Fe	85	270	860	2,720	8,610
SR-56	Camino Santa Fe/Third Interchange	85	260	825	2,610	8,260
SR-56	Third Interchange/Camino Ruiz	80	245	780	2,470	7,810
Camino Santa Fe	Del Mar Heights Road to SR-56	--	--	115	370	1,170
Camino Santa Fe	South of SR-56	--	--	--	75	230
Carmel Valley Road	Del Mar Heights Road/Rancho Santa Fe Farms Road	--	--	85	260	830
Carmel Valley Road	Rancho Santa Fe Farms Road/Camino Ruiz	--	--	115	370	1,175
Del Mar Heights Road	Lansdale East to Camino Santa Fe	--	--	120	380	1,200
Third Interchange Road	Carmel Valley Road/SR-56	--	--	100	320	1,010

*Distances less than 50 feet are not shown

TABLE 4K-6
DISTANCE TO NOISE CONTOURS—ALIGNMENT “D”

Roadway	Segment	Distance from Centerline to Contour (feet)*				
		80 CNEL	75 CNEL	70 CNEL	65 CNEL	60 CNEL
SR-56	Carmel Country Road/Camino Santa Fe	90	280	880	2,790	8,820
SR-56	Camino Santa Fe/Camino Ruiz	85	265	835	2,640	8,360
Camino Santa Fe	Del Mar Heights Road to SR-56	--	--	125	395	1,240
Camino Santa Fe	South of SR-56	--	--	130	410	1,310
Carmel Valley Road	Del Mar Heights Road/Rancho Santa Fe Farms Road	--	--	105	325	1,030
Carmel Valley Road	Rancho Santa Fe Farms Road/Camino Ruiz	--	--	105	335	1,070
Del Mar Heights Road	Lansdale East to Camino Santa Fe	--	--	105	330	1,040

*Distances less than 50 feet are not shown

As a general rule of thumb, a barrier provides five decibels of attenuation when it just breaks the line-of-sight between the source and receiver, and adds one decibel of attenuation for each foot above the height required to break the line-of-sight. Therefore, it is anticipated that noise barriers varying from five to eight feet will be required along the other major roadways within Pacific Highlands Ranch where the roadways are located adjacent to sensitive land uses.

At the time that detailed grading plans are available for the future subdivisions within Pacific Highlands Ranch, detailed acoustical analyses shall be performed to determine the exact barrier heights and locations where required. If exterior noise levels within residential areas are found to be above 60 CNEL after mitigation, then detailed interior noise analyses shall be required as well.

L. Public Services/Facilities

Existing Conditions

a) Elementary, Middle, and High Schools

The project site is located within the jurisdiction of the Solana Beach Elementary School District (ESD), the San Dieguito Union High School District (HSD), and the Del Mar Union ESD. School facilities operated by the Solana Beach ESD are not be expected to serve project-generated children as they are located too far from the proposed project (at least 3.5 miles).

The project site is currently within the attendance boundaries of Del Mar Heights Elementary School located at 13555 Boquita Drive and Del Mar Hills Elementary School located at 14805 Mango Drive, both in the city of San Diego. However, reconfigured school attendance boundaries will be determined as a new school in Carmel Valley Neighborhood 4 will open in September 1998.

Earl Warren Junior High School, the junior high school expected to serve the project, is located at 155 Stevens Avenue in Solana Beach, approximately three miles northwest of the project site. Two other junior high schools (Diegueño and Oak Crest) are also part of the San Dieguito Union HSD but are located in Encinitas, approximately five miles northwest of the project site.

Torrey Pines High School, which currently serves the project vicinity, is located approximately 0.75 mile south of the site, at 3710 Del Mar Heights Road. Two special schools are also part of the San Dieguito Union HSD. These schools, Sunset Continuation and North Coast, are responsive to students with special educational or timing needs (e.g., students who work during normal schools hours or are involved in full-time athletic or arts programs). Both are located at 675 Requeza in Encinitas (approximately 8.5 miles northwest of the site). Although these schools are geographically removed from the site, special needs students from the proposed project could enroll at one of these two schools.

Table 4L-1 provides a summary of the enrollment status of existing schools, the capacity of existing and proposed schools that could serve the site, and student generation rates. Del Mar Union ESD and San Dieguito Union HSD include both permanent and district-owned relocatable classrooms in calculating total capacity. The elementary schools responsible for providing school facilities for the subarea area, Del Mar Heights and Del Mar Hills, are currently operating at 98 percent and 110 percent of permanent capacity, respectively. The junior and high schools to which project students would be sent, Earl Warren Junior High and Torrey Pines High are operating at 15894 percent and 13993

percent of permanent capacity, respectively. In October 1994, the district approved a Master Development School and Facilities Needs Analysis, which indicates that there is currently no capacity for additional students district-wide. Both the San Dieguito Union HSD and Del Mar Union School District are currently using portable classrooms to alleviate overcrowding in permanent facilities.

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TABLE 4L-1
CURRENT ENROLLMENT, ENROLLMENT CAPACITY,
AND STUDENT GENERATION RATES FOR SCHOOLS IN PROJECT VICINITY

School	Grades	Fall 1997 Enrollment	Enrollment Capacity*	Student Generation Rate (student/du)
Del Mar Union School District				
Del Mar Heights Elementary	K-6	671	687	Multi-family – 0.146 Single-family – 0.472
Del Mar Hills Elementary	K-6	576	523	Multi-family – 0.146 Single-family – 0.472
San Dieguito Union High School District				
Earl Warren Junior High	7-8	1,038	1,140	Multi-family – 0.02 Single-family – 0.11
Torrey Pines High	9-12	2,316	2,182	Multi-family – 0.07 Single-family – 0.22
San Dieguito High	9-12	1,147	1,200*	Multi-family – 0.07 Single-family – 0.22
Solana Beach School District	**	**	**	Multi-family – 0.131 Single-family – 0.434

SOURCE: Fall 1997 enrollments, enrollment capacities, and student generation rates, Del Mar Union ESD, 1997 and San Dieguito Union HSD, 1998.

*Solana Beach School District does not have existing schools in the project area.

**Enrollment capacity includes both permanent and temporary capacities.

Currently, Earl Warren and Torrey Pines have 20 on-site portables. The use of portable classrooms is considered a temporary rather than permanent measure.

b) Parks and Recreation

According to the Progress Guide and General Plan of the City of San Diego (1989), the criterion for population-based parks and facilities is service for “a resident population of 3,500 to 5,000 persons within a 1/2 mile radius” and they should contain “a minimum usable area of 5 acres when located adjacent to an elementary school or 10 acres when not

so located.” Parks meeting this standard are referred to as neighborhood parks. Larger facilities intended to serve a more extensive population are referred to as community parks. These community parks should supplement the facilities in neighborhood parks. The criterion for a community park reads as follows: “Community facilities should serve 18,000 to 25,000 residents within approximately a 1-1/2 mile radius. Ideally they should have at least 13 usable acres if adjacent to a junior high school or 20 usable acres if not so located.” Because community parks are primarily used for playing fields, usable acres are generally defined as acreage graded to a two percent or less slope (Fye, pers. com. 1992). However, this guideline can be relaxed for pathways and picnic areas where a flat surface is not as critical (Fye, pers. com. 1992).

The Framework Plan for the NCFUA shows a community park northeast of the project site in the northeast portion of Subarea IB. The Framework Plan requires that neighborhood park requirements and locations be determined at the subarea planning stage.

Table 4L-2 lists existing and proposed parks in the communities surrounding the project area. The nearest existing and proposed neighborhood and community parks are located in the Carmel Valley community located immediately west of the project site and were sized in accordance with the population needs of that community.

**TABLE 4L-2
EXISTING PARKS IN THE PROJECT VICINITY**

Park	Site Developed?	Acreage	Adjacent School
Neighborhood Parks			
Solana Highlands	Yes	12	Solana Highlands Elementary
Carmel Del Mar Park	Yes	12	Carmel Del Mar
Ashley Falls Park	Under Construction	12	Under Construction/open Fall 1998
Carmel Center Park	Yes	12	Elementary School
Crest Canyon Park	No	10	None
Community Parks			
Black Mountain Ranch	No	30	None
Canyonside	Yes	20	None
Carmel Valley Town Center	Under Construction	18	Proposed junior high school
Regional Resource-based Parks			
Black Mountain	N/A		None
San Dieguito River Park	No	80,000	None
Torrey Pines Golf Course and City Park	Yes	420	None
Torrey Pines State Reserve and Beach	N/A	1,750	None
Los Peñasquitos Canyon Preserve	N/A	3,000	None

The North City West Community Plan and Carmel Valley Neighborhood Precise Plans identify one planned neighborhood park in Neighborhood 4, approximately one and one-half miles west of the project site. This park will consist of approximately 12 acres and will be adjacent to a planned school. Torrey Highlands Park, approximately one mile south of the site and two miles west of the site, has picnic and play areas, as well as paths leading to view areas overlooking the project site (see Landform Alteration/Visual Quality discussion). This approximately seven-acre park is not part of the population-based recreational facilities shown on Table 4L-2 but was developed as "enhanced open space" by the Carmel Del Mar developers. The Carmel Valley North Community Park is being designed, with construction to start in fiscal year 1997. One existing community park (Canyonside) is located approximately six miles southeast of the proposed project site adjacent to the Los Peñasquitos Canyon Preserve. The preserve itself is comprised of approximately 3,000 acres with associated access trails for hikers, mountain bikers, and equestrians. The preserve can accommodate up to 664 users at one time. The Black Mountain Ranch project, northeast of the project site in Subarea I of the NCFUA, proposes to provide a community park.

The portion of Gonzales Canyon which crosses the project site is within the Focused Planning Area of the San Dieguito River Valley Regional Open Space Park, a planned resource-based park (defined as a park located at or centered around some natural or man-made feature). Other resource-based parks available to project area residents include the planned Black Mountain Park, Torrey Pines Golf Course and City Park, and Torrey Pines State Reserve and Beach. Los Peñasquitos Canyon Preserve is also located in the vicinity, south of the site.

Fairbanks Ranch and The Farms Country Clubs are also located just north of the project area. These private/semiprivate facilities may be joined by future project site residents.

c) Library

The Progress Guide and General Plan establishes guidelines and standards for branch libraries. Ideally, branch libraries should serve a resident population of 30,000 and may be established when a service area, which is expected to grow to 30,000 residents within 20 years of library construction, has a minimum population of 18,000 to 20,000. Branches should be located in areas of intense people activity, with a 2.0-mile maximum service area, where trips can be combined with other daily trips. Library design should be flexible to accommodate changing community needs and possible conversions to other (such as commercial or office) uses in the future. Under the Framework Plan, a minimum of one branch library is to be located in the NCFUA based on the population figures proposed in the plan.

There are no branch libraries located within the project site. The Carmel Valley Library, located at 3919 Townsgate Drive, is the City of San Diego library nearest the project.

This 13,000-square-foot branch library is approximately 1.5 miles west of the project and was constructed to serve existing need in the Carmel Valley Community. The 20,000-square-foot Rancho Peñasquitos Branch library is approximately 2.5 miles east of the project site and is located at 13355 Salmon River Road. Other libraries within 5.0 miles include Solana Beach Library at 981 Lomas Santa Fe Drive (approximately 2.5 miles northwest) and Rancho Santa Fe Library at 17040 Avenida de Acacias (approximately 2.0 miles north).

In addition to these branches, the City of San Diego Public Library operates a Bookmobile that is used primarily to bring books to immobile people, educate elementary school children, and provide access to books when a particular branch is closed for some reason. The City of San Diego also is part of a county-wide cooperative relationship known as the Serra Cooperative Library System. This cooperative library system allows residents of the City of San Diego and the county of San Diego to use facilities of other public libraries in the same area.

For example, a resident of the City of Carlsbad could use the City of San Diego Main Library or any branch library facilities through the Serra Cooperative Library System, and a resident of the City of San Diego could use the library facilities at the City of Carlsbad. This system expands the accessibility of public library facilities to communities that are adjacent to each other.

d) Fire Service

The project area is 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. The City's Progress Guide and General Plan establishes guidelines and standards for fire protection services. Fire stations should be sited to provide rapid response time within urbanized areas and should occupy a minimum of 0.5 acre of land.

Fire protection services for the proposed project site is provided by City fire stations located in Carmel Valley and Mira Mesa. As identified in Table 4L-3, the best current response time to the project site from surrounding fire stations is approximately 4.1 minutes from Station No. 24, located approximately 1.2 miles south-southwest of Pacific Highlands Ranch. Currently, there are 4 firefighters at Station 24 and 10 at Station 41 (see Table 4L-3). All firefighters are EMT-D certified and both stations are manned 24 hours a day with a minimum of four firefighters per engine and truck company.

**TABLE 4L-3
FIRE STATION RESPONSE TIMES**

Station	Location	Response Time to Pacific Highlands Ranch
San Diego Fire Department Station 24	13077 Hartfield Avenue	4.1 minutes
San Diego Fire Department Station 41	4914 Carroll Canyon Road	13.4 minutes

e) Police Service

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.

Police protection for the project area is provided by the Northern Division of the San Diego Police Department, located at 4275 Eastgate Mall in La Jolla. There are presently 157 sworn police officers and 16 nonsworn personnel assigned to the division. The City of San Diego Police Department presently maintains a city-wide ratio of 1.65 sworn personnel per 1,000 residents. (Waskiewicz, pers. com. 1997)

The City of San Diego is divided into "service areasbeats" for patrol purposes. The city-wide average police response time is seven minutes for emergency and priority one calls. The Northern Division response time is seven to eight minutes. Although the Northern Division is currently operating at a minimum staffing level of 80 percent of budgeted strength, the current level of service is within the acceptable range of calls for service/officer ratios.

The police facility at Eastgate Mall is approximately six miles to the south of the Pacific Highlands Ranch project site.

The NCFUA Framework Plan states that a police substation should be sited within the NCFUA to attain the department's goals of an average seven-minute response time. The department indicates that the NCFUA police station should be a 20,000-square-foot facility, ideally constructed on a four-acre site. The Police Department is proposing the development of a new police station (Northwestern Division) on Del Mar Heights Road at Hartfield Avenue with full service operations beginning by July 2002. The Northwestern Division will service Subareas' I, II, and III.

f) Water

Pacific Highlands Ranch is within the water service area of the City's existing Miramar Water Treatment Plant. Currently, potable water is delivered to the project site via the 30-

inch Del Mar Heights Pipeline. This pipeline traverses Pacific Highlands Ranch, following the existing alignment of Black Mountain Road and continuing west through Carmel Valley to Interstate 5 along Del Mar Heights Road.

Water from the Miramar Water Treatment Plant is reduced in pressure before it is delivered to the northern areas of the city. The Del Mar Heights Pipeline is currently supplied from two separate pressure reducing stations. A pressure reducing station at the 36-inch Ranch Bernardo Pipeline brings water from the east directly to the project site. A second pressure reducing station off the 36-inch Miramar Extension Pipeline delivers water from the south via the Soledad Valley Pipeline.

Currently, the existing users of potable water in Pacific Highlands Ranch are primarily large commercial growers. The growers in Pacific Highlands Ranch are served from private distribution systems which originate at the Del Mar Heights Pipeline. The City's only distribution pipelines within the proposed development are in Rancho Santa Fe Farms Road and Caminito Mendiola Road, serving users south of Black Mountain Road in the existing estate-lot single family residences.

A planned Capital Improvement Project (CIP) for the City's domestic water system which will ultimately affect supply to Pacific Highlands Ranch is the proposed Carmel Mountain Road Pipeline. This pipeline is planned as a 24- or 30-inch diameter transmission pipeline extending east-west between the Rancho Bernardo Pipeline and the Soledad Valley Pipeline. A portion of this pipeline and a pressure reducing station have been constructed from the Rancho Bernardo Pipeline to the eastern border of the NCFUA. Exact plans for the location of the pipeline are uncertain; however, the pipeline may be realigned with either SR-56, or Black Mountain and Carmel Valley Roads.

Through two planning efforts currently under way, the City of San Diego is preparing to serve this and other North City developments through existing and planned water treatment and distribution facilities. A facility plan is currently being prepared for the Alvarado Water Treatment Plant, and a citywide water system master plan is being performed concurrently. The City of San Diego is also in the preliminary design phase of a 15- to 20-million-gallon storage reservoir to be located northeast of the project site. The City's preferred site for this regional facility is on the Black Mountain Ranch property, which is part of Subarea I. A reservoir at this location could supply the Del Mar Heights Pipeline through the Rancho Bernardo Pipeline.

City of San Diego Ordinance No. 0-17327-NS (New Series) (adopted July 1989) requires use of reclaimed water, when available, for irrigation of landscape areas as allowed by County Health Department regulations. At present, reclaimed water is allowed for road parkway and medians, commercial and industrial uses, irrigation of public maintenance areas within multi-family areas, parks, and greenbelts, and agricultural crops not for

human consumption. Further discussion of reclaimed water can be found in Chapter 4.M of this report.

g) Sewer Facilities

The Carmel Valley Trunk Sewer (CVTS), an existing City of San Diego gravity trunk sewer, collects wastewater from communities between Interstates 15 and 5. The CVTS wastewater flows westward through Carmel Valley, crossing Interstate 5, and turns south along Sorrento Valley road to the City of San Diego Sewer Pump Station 65. Wastewater flows are then pumped to Sewer Pump Station 64, which in turn pumps these flows and flows from other trunks to the Point Loma Wastewater Treatment Plant.

The CVTS is approximately 34,000 feet long and consists of pipeline diameters of 18, 21, 24, 27, 30, and 33 inches. The sewer was originally constructed in the early 1970s of Reinforced Plastic Mortar, pipeline material, commonly known as Techite. Subsequent projects since the original construction have relocated, replaced, and upsized some sections of the pipeline. The remaining sections of the original pipeline are now deteriorating and in need of replacement.

Tributary to the CVTS is the El Camino Real Trunk Sewer, which flows north to south through the Carmel Valley development and joins the CVTS east of the I-5. The El Camino Trunk Sewer conveys flows from Sewer Pump Station 79 and two 8-inch force mains together with wastewater collected as it gravity flows through Carmel Valley. The two parallel 8-inch force mains are in the alignment of Old El Camino Real, which forms the northwest border of Pacific Highlands Ranch.

An existing 15-inch sewer collects flows from nurseries located in the northwest corner of the subarea. This 15-inch sewer flows west, crossing over the 8-inch force mains and collecting flows through a portion of Subarea II before gravity flowing into Pump Station 79.

h) Waste Management Services

At present, the project would be served by Miramar Landfill, which encompasses approximately 1,423 acres, 857 acres of which are used for disposal currently. As of March 1998, the remaining capacity of Miramar Landfill was estimated to total approximately 30.4 million cubic yards (cy), and is anticipated to reach capacity by the year 2011. The landfill currently accepts in excess of 1.3 million tons (approximately 2.1 million cy) of refuse each year (Tirandazi, pers. com. 1997).

In 1989 the State Assembly passed the Integrated Waste Management Act, Assembly Bill (AB) 939, which requires each city and county within California to recycle or divert 25 percent of its current waste stream from landfills by December 1995 and 50 percent by

December 2000. It is anticipated that with implementation of source reduction and recycling programs and rock aggregate extraction program (which excavates construction materials from the landfill in order to create additional disposal area), the Miramar Landfill will serve as a solid waste disposal site through the year 2011.

With respect to the project site, it should be noted that the project area is not located within the City's existing curbside recyclable materials and yard waste collection service areas. Other City services are available to all residents and would be affected by the project. Refuse collection services for the commercial/industrial development, and multi-family residences would be provided by the private sector, thereby not affecting City refuse collection forces. The City offers commercial/industrial waste reduction programs, which may be affected by the proposed project. The service provider for single-family homes depends on whether access to the project site would be via private or public streets. Should the residential units be accessible through public streets, single-family residential collection would be provided by City collection forces. Each City collection crew handles about 4,000 homes per year (weekly collection) at a cost of about \$90 per home per year. Residential solid waste collection service would be provided on public streets by the City of San Diego and by private companies such as USA Waste, Allied, and Waste Management on private roads.

Public Services/Facilities Issues

1. How would implementation of the Subarea Plan affect public services, particularly schools, parks, libraries, and police and fire protection?
2. Would implementation of the plan result in the use of excessive amounts of water, resulting in the depletion of domestic water supplies or the generation of excessive amounts of wastewater? Would implementation of the subarea plan result in the generation of excessive amounts of solid waste?

1) Issue

How would implementation of the Subarea Plan affect the public services, particularly schools, parks, libraries, and police and fire protection?

Impacts

a) Elementary, Middle, and High Schools

The proposed alternatives for Pacific Highlands Ranch would create an increased demand for educational facilities. A generation factor of number of students per dwelling unit is

used to estimate the number of new students a development would bring to an area (see Table 4L-1).

Del Mar Union School District

Subarea Plan 1. The proposed project, under this plan, would result in the addition of 1,325 single-family dwelling units and 1,723 multi-family dwelling units within the Del Mar Union School District boundaries. The District's student generation rates of 0.472 for single-family units and 0.146 for multi-family units would generate a total of 877 elementary school students for this school district.

If the private high school site, junior high school site, and one of the elementary schools sites is not developed and redesigned for residential use, then there could be a potential increase in the number of residential dwelling units. Under this scenario, an additional 300 single-family units and 182 multi-family units would be added that would fall within the Del Mar Union School District boundaries. Given this situation, an additional 168 elementary school students would be generated for a total of 1045 (877 + 168) students for this school district. The proposed project would result in approximately 1,733 new multi-family dwelling units and 3,241 new single-family detached units. The student generation rates for the district that would serve the area would result in 1,291 elementary students, 448 junior high students, and 846 high school students.

Subarea Plan 2. The proposed project, under this plan, would result in the addition of 1,940 single-family dwelling units and 1,733 multi-family dwelling units within the Del Mar Union School District boundaries. The District's student generation rates of 0.472 for single-family units and 0.146 for multi-family units would generate a total of 1,169 elementary school students for this school district.

If the three school facilities (private high school, junior high school, and one elementary schools) are not developed and are redesigned for residential use then an additional 414 single-family units and 26 multi-family units would be added within the Del Mar Union School District's boundaries. Given this scenario, an additional 199 elementary students would be generated for a total of 1,368 students (1,168 + 199) for this school district.

Solana Beach School District

Subarea Plan 1. The proposed project, under this plan, would result in 1,856 single-family units and 70 multi-family units within the Solana Beach School District boundaries. Using the District's student generation rates of 0.434 for single-family units and 0.131 for multi-family units, a total of 815 elementary school students would be generated.

Under this plan, there would be a potential increase in the maximum number of dwelling units should the private high school, junior high school, and one elementary school not be developed and redesigned for residential use. However, all residential units generated under this scenario would fall within the boundaries of the Del Mar Union School District and would not generate any additional students for the Solana Beach School District.

Subarea Plan2. The proposed project, under this plan, would result in 1,300 single-family units and no multi-family units within the Solana Beach School District boundaries. Using the District's student generation rate of 0.434 for single-family units a total of 564 elementary school students would be generated.

Again, should the three school facilities discussed above not be developed then there would be a potential increase in the number of dwelling units. However, any additional units would occur within the boundaries of the Del Mar Union School District and would not generate any additional students within the Solana Beach School District.

San Dieguito Union High School District

Subarea Plan 1

The proposed project, under this plan, would result in a total of 3,161 single-family units and 1,813 multi-family units. Given the District's junior high school student generation rates of 0.11 for single-family units and 0.02 for multi-family units, 384 junior high school students would be generated. The District's student generation rates for high schools is 0.22 for single-family units and 0.07 for multi-family units. Using these rates, a total of 822 high school students would be generated.

Under this plan, there could be a potential increase in the number of residential dwelling units should the three school facilities discussed previously not be developed and redesigned for residential use. Under this scenario, an additional 300 single-family units and 182 multi-family units would be added and would fall within the San Dieguito Union High School District boundaries. Given this situation, an additional 37 junior high school students and 79 high school students would be generated for a total of 421 junior high school students and 901 high school students.

Subarea Plan 2. The proposed project under this plan would result in a total of 3,240 single-family units and 1,733 multi-family units. Given the District's junior high school student generation rates of 0.11 for single-family units and 0.02 for multi-family units, 391 junior high school students would be generated. The District's student generation rates for high schools is 0.22 for single-family units and 0.07 for multi-family units. Using these rates, a total of 834 high school students would be generated.

If the three school facilities (private high school, junior high school, and one elementary schools) are not developed and are redesigned for residential use then an additional 414 single-family units and 26 multi-family units would be added within the San Dieguito Union High School District's boundaries. Given this scenario, an additional 46 junior high school students and 93 high school students would be generated for a total of 437 junior high and 927 high school students for this school district.

Given that the existing schools in all three school districts are operating above permanent capacity in the project area, the addition of new students can only be accommodated through expansion of facilities and development of new schools.

Three new elementary schools, one junior high, and one public high school site are included in the Pacific Highlands Ranch Plan. The proposed senior high school would be sited in the Town Center area, as the location reinforces the important role of the school within the community. The proposed junior high school would be sited as to organize the community and allow for a variety of transportation means to serve the school. The elementary schools would be located adjacent to the neighborhood parks. The combined use of the schools and parks would provide for easy access for the surrounding neighborhoods and town center by trails and paths. The siting of schools in Plan 1 and Plan 2 conform to the Progress Guide and General Plan site size standards for schools. The affected school districts, the applicant, and the City shall ensure that adequate school facilities are built in a timely manner as outlined in the Master Development School and Facilities Needs Analysis.

b) Parks

Using a generation rate of 2.6 persons per household (SANDAG Series 8 Population Forecast), buildout of the proposed Subarea Plan would result in a population of approximately 12,932 persons. Based upon Progress Guide and General Plan specific standards for population-based parks (2.4 acres per 1,000 persons), the project would generate a demand for 30 acres of community and neighborhood parks.

The development of parks in Pacific Highlands Ranch will ensure that the community has adequate park facilities and spacing.

Pacific Highlands Ranch has approximately 50 acres of land utilized for parks and recreation pursuits (30 acres of community and neighborhood parks and 20 acres of urban amenity open space). An Environmental Tier, as noted in Chapter 3.C, consists of approximately 1,300 acres within the subarea. These acres will be preserved or enhanced to become a vital element of the NCFUA-wide tier. There will be approximately 15 miles of trails within the tier, designated specifically for hiking, biking, or equestrian uses. Off-site linkages will also be provided to significant natural resources outside the proposed project site.

The Pacific Highlands Ranch Plan proposes three parks: one community park and two smaller neighborhood parks. The neighborhood parks will be located adjacent to the elementary schools, while the community park will be located in the proximity of the Village. The Plan also includes a civic use area located in the Village, and three open space overlooks located across the subarea. A third neighborhood park would be required if the private high school is not built. A two-acre site shall be reserved adjacent to the elementary school proposed west of SR-56 and east of Carmel Valley Road. Development of the private high school will relieve the developer of this requirement.

The two neighborhood parks located within Pacific Highlands Ranch will total approximately 10 acres. A 5-acre park adjacent to an 11-acre elementary school site is proposed in the eastern portion of the project site, and a 5-acre park adjacent to a 12-acre elementary school is proposed in the northern portion of the project site. The neighborhood parks will be well integrated into the residential areas of the community by virtue of their connections to pedestrian paths and bikeways. Recreational uses associated with the neighborhood parks and facilities include play areas, multipurpose courts, picnic facilities, trail and bikeway connections, lawn, and landscaping.

The community park has been sited near the Village to provide future residents access to both the Environmental Tier and the Village. The size of the community park varies with each plan. Plan 1 would require a 13-acre community park as it would be adjacent with a common boundary and grade, to the senior high school, and junior high school. Plan 2 would require a 20-acre community park as it would stand alone. The siting of the community park near the Village would increase its overall use and value to the community. Recreational uses associated with this community-wide facility will include: athletic fields, multi-purpose courts, picnic facilities, trail and bikeway connections, play areas, a recreation building, lawn areas, and landscaping. A 5-acre civic use area would be located in the Village and would be used for the library, civic activities, and open-air public gatherings. The civic use area would be connected with the rest of the community by trails and mass transportation.

The open space overlooks would be located at various vantage points across Pacific Highlands Ranch (see Figure 3-2 and 3-3) and would offer future residents views of the native topographic features of the area. The overlooks would be part of the trail system that would serve the urban and natural spaces, and would include benches, informational signs, and would also provide an area to initiate and terminate hikes.

c) Libraries

The new residents of Pacific Highlands Ranch would incrementally increase the demand for library facilities. The establishment of a new library branch requires at least 18,000 to 20,000 new residents, with the expectation of serving about 30,000 within 20 years.

Pacific Highlands Ranch is only expected to have a resident population of approximately 12,000; however, the library will serve the entire NCFUA.

A library site has been designated in the Village of Pacific Highlands Ranch. This siting will enhance the cultural and civic aspects of the entire community. The location of the library will allow library usage to be combined with other business, civic, and shopping activities.

d) Fire Service

The added fire protection requirements of the proposed development would create a need for additional fire protection facilities. Although Station 24 would provide adequate fire protection and emergency response services to all of the subarea, the additional residential units under the proposed project plans would incrementally increase the demand for fire services.

A 3.0-acre double fire station facility (including a wildfire unit) is proposed to be located in the eastern portion of the proposed project site. This facility would be developed according to the City's Progress Guide and General Plan for fire protection services. The site would allow the Fire Department to attain its goal of a maximum response time of six minutes in most cases. However, until the new fire station is operating, the Fire Department may not be able to provide a six-minute maximum first response time to all portions of the subarea.

e) Police

Funding for police services is provided by the General Fund of the City of San Diego. The proposed project would create the need for additional police personnel and facilities. The adequacy of police service is a factor of community-wide importance and cannot be entirely resolved on a site- or project-specific basis. Police protection is ordinarily extended to newly developed areas and funded as a function of the increased tax base.

Implementation of the subarea plan would incrementally increase the demand for police services. Any incremental demand in services, in order to provide adequate response times and levels of service to the community, would require an increase in officers, equipment, and support personnel.

Significance of Impacts

a) Elementary, Middle, and High Schools

Currently, all schools in the Del Mar Union and San Dieguito Union High~~Solana Beach~~ school districts are operating at or above capacity within the project area. The generation

of additional elementary school students resulting from development of the proposed project, either under Subarea Plan 1 or Subarea Plan 2 would add to the ~~potential~~already overcrowded ~~ing of the schools~~. This is considered a significant direct and cumulative impact.

Currently, there is insufficient capacity at Earl Warren Junior High School to accommodate the additional 448 ~~junior high students~~ generated by buildout of the proposed project, either under Subarea Plan 1 or Subarea Plan 2~~plan~~. This is considered a significant direct and cumulative impact of the project.

Currently, Torrey Pines High School is operating above capacity. The estimated generation of ~~846~~ additional high school students would contribute to the overcrowding of the school. This is considered a significant direct and cumulative impact.

b) Parks, Library, ~~Fire,~~ and Police Services

Development of the subarea plan would incrementally increase the demand for parks and recreation, library, police, and fire services; however, both subarea plans provide sites for a library, ~~a double fire station,~~ and three parks. ~~As a result, T~~the incremental increased demand on these parks, library, and police services would not constitute a significant impact.

c) Fire Services

Development of the subarea plan would incrementally increase the demand for fire services; however, both subarea plans provide a site for a double fire station. Until the new fire station is operating, the Fire Department's potential inability to provide a maximum six-minute first response time would be considered an interim significant impact.

Mitigation, Monitoring, and Reporting

a) Elementary, Middle, and High Schools

1. The development of the proposed on-site elementary, junior high, and high schools would accomplish mitigation of the project's direct impact to schools from the subarea plan. School facilities financing and mitigation agreements between the affected school districts and the project applicants would be required at the time the Subarea Plan is approved by the City Council tentative maps are processed would be required to ensure that the impacts on school facilities educational services are mitigated to a level less than significant. In addition, prior to granting a ministerial or discretionary entitlement for a parcel, such parcel shall be subject to the terms of a mitigation agreement entered into by the

landowner and the applicable School Districts or included in a community facilities district established by the applicable School Districts and authorized to fund the acquisition of school sites and construction of schools.

b) Park, Library, ~~Fire~~, and Police Services

No mitigation is required, as adequate library, ~~fire~~, police, and community park facilities are provided for in the proposed subarea plan or in surrounding areas.

c) Fire Service

Until the new fire station is operating, developers shall demonstrate to the satisfaction of the City Fire Department that a response time of six minutes or less from Fire Station 24 to all portions of new developments can be achieved. For those areas of such new developments where a six-minute response time cannot be provided, individual sprinkler systems or other construction or site design safeguards, approved by the Fire Department, shall be required prior to the issuance of building permits.

2) Issue

Would implementation of the subarea plan result in the use of excessive amounts of water, resulting in the depletion of domestic water supplies or the generation of excessive amounts of wastewater? Would implementation of the subarea plan result in the generation of excessive amounts of solid waste?

Impacts

The proposed Pacific Highlands Ranch Plan includes the development of 4,974 residences; however, the number of residential units could increase to 5,456 if the private high school site is not developed as a school, and the third elementary and junior high schools are not needed. These sites would be redesignated for residential use.

a) Water Service

Although the availability of water in southern California could become a constraint in future years, the policy position of the San Diego County Water Authority is that it is capable of providing potable water in quantities required by its member agencies. This policy is implemented by augmenting supplies when necessary to meet the growing needs of the service area. It can be assumed that an adequate water supply would be available to the subarea.

The City of San Diego Water 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. The existing regional infrastructure would be sufficient to provide the projected water consumption volume. Local improvements would be required to bring the water to the site. These improvements would be in place prior to development.

Average water demand estimates are based on 150 gallons per capita per day for residential use, 4,000 gallons per net acre per day for fully landscaped parks, and 5,000 gallons per net acre per day for commercial/institutional and school uses (City of San Diego 1994a). The estimated water consumption rates have decreased over past years due to increased consumption awareness, conservation goals, and water rationing. The anticipated water usage rates at buildout of 5,456 residential units with an average 2.6 persons per dwelling unit would represent an estimated consumption of 2,127,840 gallons of water per day. The estimated water consumption for commercial/industrial, schools, employment center, and public facilities would be 1,025,000 gallons/day. Water consumption for the neighborhood and community parks would be 120,000 gallons/day. Total water consumption for the project would be 3,272,840 gallons/day (Table 4L-4).

Chapter 4.M, Water Conservation, of this MEIR includes an analysis of the project's design elements to conserve water.

TABLE 4L-4
ESTIMATED WATER USAGE
(million gallons per day)

Land Use	Amount	Unit Water Usage ¹	Estimated Water Usage (mgd)
Residential	14,186 persons	150 gpd/capita	2.128
Commercial	33 acres	5,000 gpd/acre	0.165
Schools/Public Facilities	152 acres	5,000 gpd/acre	0.760
Employment center	20 acres	5,000 gpd/acre	0.100
Parks	30 acres	4,000 gpd/acre	0.120
TOTAL			3.273

gpd = gallons per day.

¹Generation rates obtained from the City of San Diego Water Utilities Department (Juybari, pers. com. 1993).

TABLE 4L-5
ESTIMATED WASTEWATER GENERATION
 (million gallons per day)

Land Use	Amount	Unit Wastewater Generation ¹	Estimated Wastewater Generation (mgd)
Residential	5,456 units	280 gpd/unit	1.528
Commercial	33 acres	3,180 gpd/acre	0.105
Schools/Public Facilities	152 acres	2,500 gpd/acre	0.380
Employment center	20 acres	2,500 gpd/acre	0.050
TOTAL			2.063

gpd = gallons per day.

¹Generation rates obtained from the City of San Diego Water Department (Juybari, pers. com. 1993).

b) Sewer Facilities

The City of San Diego Water Utilities Department has calculated sewage generation at 280 gallons/day/dwelling unit, 3,180 gallons/acre/day for commercial and industrial uses, and 2,500 gallons/acre/day for schools, public facilities (town green), and employment centers (Juybari, pers. com. 1993). Therefore, buildout of the proposed subarea plan is estimated to generate 2.063 mgd of sewage effluent (see Table 4L-5).

The Pacific Highlands Ranch Plan would include the requirement that a site-specific water facilities study be prepared. All required on- and off-site water facilities as determined by the approved water facilities study must be completed and accepted by the City prior to the occupancy of any buildings. All future tentative map approvals shall incorporate and implement the appropriate recommendations of the water facilities study.

c) Waste Management Services

The proposed development will generate different kinds of solid waste. Using the City of San Diego's Environmental Services Department's waste generation factors, the project's waste stream would be divided as follows: (1) construction waste; (2) residential waste constituting about 8 percent of the total project's waste; and (3) commercial/industrial waste constituting about 92 percent of the total project waste stream.

Construction Waste

Although the proposed project would generate construction waste intermittently over several years, it is likely that the proposed project would exceed the City's Environmental

Services Division's recommended construction threshold for construction projects involving more than 10,000 square feet of building area. The preparation and implementation of a waste management plan for construction would be necessary.

Ongoing Residential/Commercial/Industrial Waste

As explained above, the project would produce residential waste amounting to only about 8 percent of the total project's waste stream. Based on research conducted on the quantity and the types of solid waste generated by the residential sector in the city of San Diego, the primary components of the waste stream are paper (29.6 percent) such as newspaper and mixed paper, yard waste (13.4 percent), plastic (7.2 percent), wood waste (6.2 percent), and glass (5.3 percent). In addition to residential use, the project consists of commercial and industrial development. Because the specific types of commercial and industrial uses are not known at this time, the types of solid waste produced by this development are also not known. Although the types of materials in the commercial and industrial waste stream vary considerably depending on the type of use, in general, paper, plastic, food, and metal are typically the most significant constituents.

The current waste generation rate for city residents is 2.0 tons/dwelling unit/year for single-family residential, 1.2 tons/dwelling unit/year for multi-family residential, 0.0066 ton/ square foot/year for commercial use, and 0.0036 ton/square-foot/year for industrial/office use (based on the average of waste generation factors for a combination of office/industrial uses and commercial uses, respectively). Using Environmental Services Division's waste generation factors, annual waste generation associated with the proposed uses would be 12,016 tons/year, as shown in Table 4L-6.

Significance of Impacts

a) Water and Sewer Facilities

Potentially significant impacts to water and sewer facilities are anticipated with the development of the subarea due to a lack of existing facilities to serve the area.

b) Waste Management Services

The project could generate a significant amount of construction debris during the construction phase. Also, during the ongoing use of the site solid waste generation would exceed the 60 tons/year and 52 tons/year threshold of significance for solid waste impacts for residential and non-residential projects, respectively, established by the City's ESD. The project would affect City waste management programs and services; however, impacts could be minimized by incorporation of recycling and waste reduction measures in project design.

TABLE 4L-6
SUBAREA III SOLID WASTE GENERATION
(tons/year)

Source	Proposed Units/ Sq. ft.	Generation Rate	Yearly Waste Generated
Single-family Residential	3,461 dwelling units	2.0 tons/du/year	6,922
Multi-family Residential	1,995 dwelling units	1.2 tons/du/year	2,394
Commercial Uses	300,000 sq. ft	0.0066 tons/sq. ft/year	1,980
Employment/Office Uses	200,000 sq. ft	0.0036 tons/sq. ft/year	720
TOTAL			12,016 tons/year

NOTE: Generation rates obtained from the City of San Diego Environmental Services Department (Tirandazi, pers. com. 1997).

Mitigation, Monitoring, and Reporting

a) Water

Future developers shall be required to provide appropriate water studies consistent with the findings and conclusions of the Miramar 712/North City 610 Water Study. Each developer shall be responsible for installing all those facilities identified in the accepted studies which are necessary to serve their developments. All public water facilities shall be designed and constructed according to the most current edition of the City of San Diego Water and Sewer Design Guide.

b) Sewer

Prior to any new development within the subarea, developers shall be required to provide sewer studies showing the proposed sewer system for the subarea. All public sewer facilities shall be designed and constructed according to the most current edition of the City of San Diego Water and Sewer Design Guide.

c) Solid Waste

The project's prime contractor in cooperation with the City of San Diego's Environmental Services Department shall develop a comprehensive waste management plan. The plan shall describe programs that would be implemented to reduce the potential for direct and cumulative impacts to the City's waste management services to below a level of significant. The plan shall address construction phase as well as long-term waste management issues. The Development Services shall review this plan to ensure that the ESD has signed the plan and certified that it is consistent with City policy regarding its waste management services.

Following is a list of options that could be considered for the construction phase of the project and specified in the waste management plan:

1. Source separation for all construction debris such as wood, aggregate, drywall, and other discarded products including glass, plastics, and cardboard at the project sites and subsequent recycling of the materials.
2. Buying recycled or using recycled content construction material, such as acoustical ceiling tiles made from newsprint, tiles made from recycled glass, insulation made from mixed paper, as well as many landscaping products such as pavement made from recycled asphalt and tires, and mulch and compost made from green waste.

3. Use of postconsumer aggregate base and mulch in project landscaping;
4. Use of drought-tolerant landscaping to minimize the amount of green waste generated.

Following is a list of options that could be considered to address long-term waste management issues:

1. Provision of each single-family unit with kitchens designed to facilitate recycling;
2. Source separation and recycling of demolition debris;
3. Provision of yard composters designed to encourage backyard composting.
4. Provide devices or chutes in multi-family residential units for convenient separation and recycling of materials.

The project applicant shall develop a solid waste management plan explaining how these options will be incorporated. The plan shall describe the location of exterior and interior storage areas for the collection of recyclables in multi-family residential and non-residential areas as required per Municipal Code Section 101.2001. The project proponent shall ensure the storage areas are located in areas convenient for use by residents or tenants and service providers.

M. Water Conservation

Existing Conditions

a) Water Supply and Distribution

Most of San Diego's water is imported from the Colorado River via the Colorado River Aqueduct or from northern California via the California Aqueduct, which is part of the State Water Project. The San Diego County Water Authority (SDCWA) purchases ~~acquires~~ the imported water from the Metropolitan Water District of Southern California and is the wholesaler of ~~The SDCWA sells~~ water to 23 member agencies, including the City of San Diego. The member agencies are the retailers who provide water to the general public.

Prior to transport south to San Diego, raw water is stored and treated at Lake Skinner in southern Riverside County. From Lake Skinner, the water is transported to San Diego County via the First and Second San Diego Aqueducts. Lake Hodges (to the north) and Miramar Reservoir (to the south) are the closest reservoirs. The existing City of San Diego reservoir system is not designed to capture storm runoff to take effective advantage of local rainfall but stores imported water, the supply of which fluctuates based on the snowpack in northern California. Within the past few years, the city experienced severe drought conditions due to high local demands and low snowfall and recharge rates in the northern part of the state.

A detailed account of past and present agricultural production in Pacific Highlands Ranch may be found in Chapter 4.I of this MEIR. Currently, approximately 400-500 acres are used for tomatoes, cucumbers, green beans, squash, sweet corn, bell pepper, celery, and strawberries production and 1,000-1,500 acres are in a five- to six-year fallow cycle. Currently, these agricultural crops are irrigated with treated water. Nursery use has fallen over the past few years, and consequently, so has the use of irrigation water. Also, approximately 30 residences consume water in the subarea.

b) Water Conservation

The SDCWA and the City have reacted to the drought conditions that characterized southern California in the late 1980s and early 1990s. As a result of these conditions, the policy position of the SDCWA and the City has been to implement water conservation measures to reduce potable water uses. Overall, water conservation measures in the city have been effective. A city-wide conservation goal of 20 percent from 1991 to 1995 was achieved, and since then a 10 percent goal has been achieved annually (Generoso, pers. com. 1997). Although no longer in a severe drought condition, San Diego is still in a "drought watch." In addition, the city can experience "structural drought," a condition in

which potable water supplies are restricted due to drain-off of available water for other required uses, such as native species preservation.

For the past several years, the City 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 master plan for the City's northern service area. As a requirement of the 1992 plan, new developments are required to design and install reclaimed water distribution systems which would irrigate all common areas and open space. The irrigation systems would initially be supplied from the City's potable water supply; however, when reclaimed water becomes available, the systems would be converted to reclaimed water service.

Other water conservation efforts include the City Council's approval of becoming a signatory to the Memorandum of Understanding Regarding Urban Water Conservation in California, support of proven water conservation strategies, and the creation of the City Manager's Water Conservation Advisory Committee to review proposed long-term water conservation programs.

In September 1994 the City's Metropolitan Wastewater Department implemented an "optimized" reclaimed water distribution system for reclaimed water use in the City's northern service area, which will be primarily served by the North City Water Reclamation Plant, located at Miramar Road and Eastgate Mall. This reclamation plant began to treat wastewater on April 24, 1997. The North City Water Reclamation Plant is designed to treat up to 30 million gallons of wastewater per day. Reclaimed water will be pumped to customers through a 45-mile-long distribution system stretching from Torrey Pines in the west to Scripps Ranch in the east.

Pacific Highlands Ranch, which had previously been conditioned to install reclaimed water facilities, was determined to be located outside of the optimized system service area. Therefore, the condition requiring the installation of reclaimed water facilities was waived for the Subarea (Dillon, pers. com. 1997).

Currently, potable water is delivered to Pacific Highlands Ranch via the Del Mar Heights Pipeline. A detailed discussion of water service in Pacific Highlands Ranch is provided in Chapter 4.L, Public Facilities and Services, of this MEIR.

Water Conservation Issue

1. Would implementation of the plan result in the use of excessive amounts of water, resulting in the depletion of domestic water supplies or the generation of excessive amounts of wastewater?

1) Issue

Would implementation of the plan result in the use of excessive amounts of water, resulting in the depletion of domestic water supplies or the generation of excessive amounts of wastewater?

Impacts

Implementation of the proposed Pacific Highlands Ranch Plan would change the predominant existing land use in Pacific Highlands Ranch from agriculture (approximately 1,300 acres) to residential, commercial, and open space associated with the Environmental Tier. Implementation of the project would, therefore, trade one kind of water use for another.

Water consumption estimates for each of the proposed plans for Pacific Highlands Ranch follow. (For a discussion of water services for consumption estimates, see Chapter 4L, Public Facilities and Services, Issue 2).

Subarea Plan 1. The total estimated water consumption for Subarea Plan 1 would be 2.821 million gallons per day. This is a preliminary estimate and may be higher than the actual use, since current conservation practices are not taken into account. These conservation practices include low-flow faucets, shower heads, and toilets in new residences (the latter required by the City) as well as potential use of native drought-tolerant plantings, in conjunction with water-conserving irrigation systems (see below).

Subarea Plan 2. The total water demand for Plan II would be approximately 2.865 million gallons per day.

Significance of Impacts

Subarea Plans 1 and 2. It is not anticipated that excessive amounts of water consumption or wastewater generation would result from implementation of the proposed plan. By observing guidelines established in the City of San Diego Water Utilities

Department Planning and Design Guide and Landscape Technical Manual, potential adverse impacts to the city's water supply would be less than significant.

The project's contribution to the cumulative impact associated with water supplies would be reduced to a nominal level by the mitigation measures outlined below.

Mitigation, Monitoring, and Reporting

Subarea Plans 1 and 2. The following mitigation measures shall be incorporated into project design guidelines to address cumulative water usage concerns.

1. Limit grading in areas where no construction is proposed; thereby reducing the need for planting and irrigation of graded areas.
2. Provide lifts of low-clay content soil in landscaped areas to improve infiltration.
3. Reduce runoff potential from landscaped areas by using berming, raised planters, and drip irrigation systems.
4. Install soil moisture override systems in all common irrigation areas to avoid sprinkling when the ground is already saturated.
5. Identify in the plant materials list in the project design guidelines whether or not plants are native or naturalize easily and incorporate a list of local California sources for native plants.
6. Incorporate low-flush toilets, low-flow faucets, and timers on sprinklers (including nighttime watering) into project design.
7. Provide information regarding water conservation measures to new residents at the time of lot purchase.

The Development Services Development Coordinator shall review grading, landscape, and building permits to ensure the above measures have been noted on plans.

N. Public Safety

Existing Conditions

a) Electromagnetic Fields

As shown in Figure 2-3, a San Diego Gas & Electric high-power transmission line easement and overhead electrical distribution line extend through or adjacent to Pacific Highlands Ranch at the eastern boundary of the subarea.

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, "If, 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 described below on the project sites) 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 man-made electric and magnetic fields are ubiquitous 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 4N-1.

Because X rays have enough 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 4N-1 shows some common electric field values. Figure 4N-2 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 sites 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.

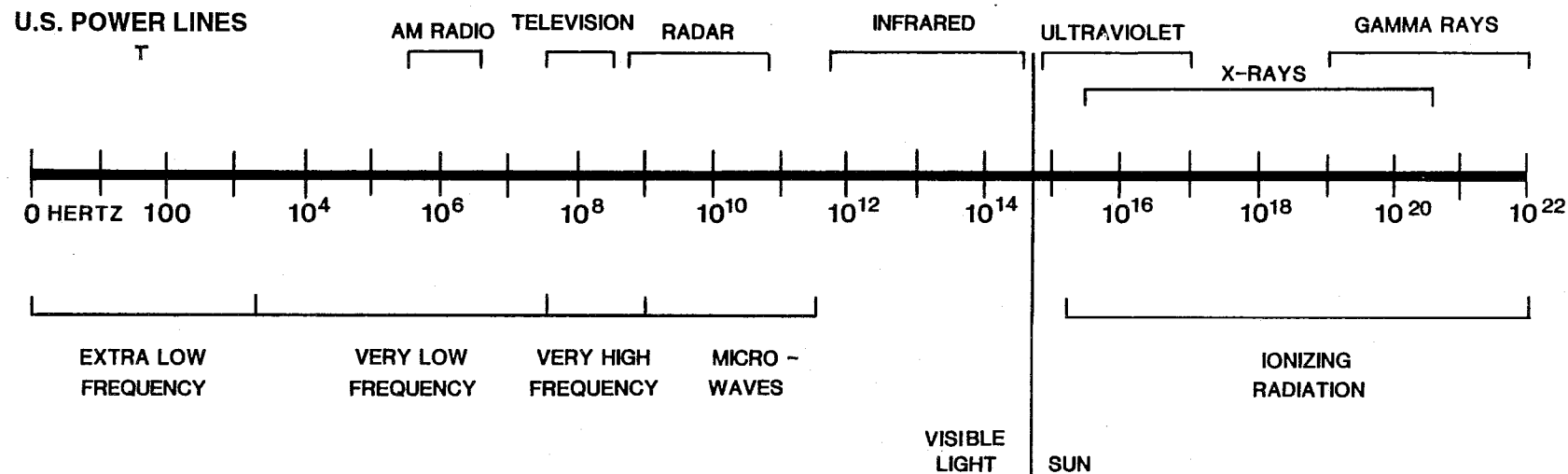


FIGURE 4N-1

Approximate Spectrum of Electromagnetic Fields

TABLE 4N-1
TYPICAL VALUES OF MAN-MADE 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.

Figure 4N-3 shows a lateral profile of a magnetic field at ground level for typical transmission lines. Table 4N-2 shows some common magnetic field values.

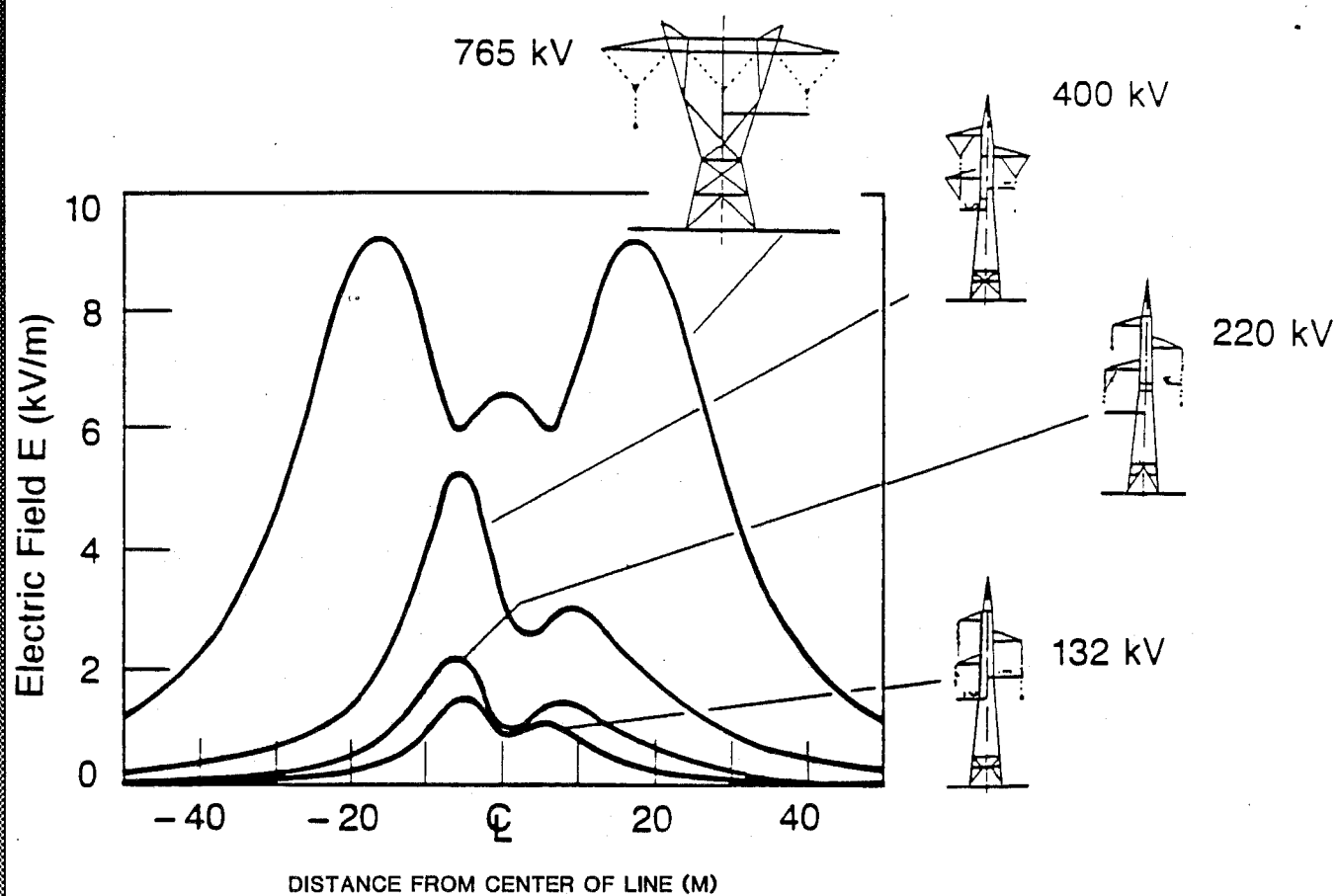
Reports from the Soviet Union of various health complaints among utility workers in high-voltage switchyards in the early 1970s generated worldwide concern regarding the possibility of adverse health effects from exposures to electric fields. Subsequent research on electrical utility workers in Europe 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).

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



SOURCE: IERE 1988

FIGURE 4N-3
Lateral Profiles of
Electric Field Intensities of Typical Power Lines

TABLE 4N-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.

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) homes 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; McDowell 1986; Coleman, Bell, and Primic-Zakelj 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 DOHS

1992; Bailey Research Associates 1992; U.S. EPA 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 DOHS 1992; Bailey Research Associates 1992).

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.

The bottom line is that there is no established cause and effect relationship between EMF exposure and cancer or other disease. For this reason, we can't define a hazardous level of EMF exposure (EPA 1992).

Since 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.

b) Hazardous Materials

Historic use of Pacific Highlands Ranch property has been primarily agricultural. The public safety concern exists that soils on the site may be contaminated by hazardous materials in the form of pesticides and herbicides applied as part of agricultural operations. Pesticides that may have been used on field type crops in the past include DDT and Chlorodane. Both types of pesticides are chlorinated hydrocarbons that persist for a long time after application. Chlorodane has been observed to have a half-life of up to 30 years. Both Chlorodane and DDT have been outlawed. More recently, fungicides and organophosphate insecticides have been used. These insecticides and fungicides breakdown much more quickly than the chlorinated hydrocarbons. Both completely breakdown within one or two days after application.

The County Department of Health and Services Hazardous Materials Management Division case files were examined to determine if the County has a file listing for the project site. The County Hazardous Materials Management Division case files contain records of organizations which have obtained permits for release of hazardous materials. The case file listings did not show any permitted hazardous material sites on or within close proximity to the site.

The County Department of Agriculture has no official directive on this potential public safety issue. However, it does control the application of pesticides and herbicides on agricultural lands through state-mandated requirements to register and record the use of these materials on individual properties. Thus, indirectly the County would not allow the application of pesticides and herbicides that would violate state and federal laws and would pose potential public safety problems.

c) Vectors

Standing bodies of water may provide breeding habitat for mosquitoes, which carry and transmit diseases, including malaria and viral encephalitis. Twenty-four species of mosquitoes found in the county are disease bearing. Mosquitoes require ponded water or slow-flowing sections of streams to deposit eggs and allow larval development.

The only standing body of water on-site that could provide suitable breeding habitat for mosquitoes is the existing reservoir/pond in Deer Canyon. This reservoir is approximately 1,800 feet from the existing residential development of Rancho Glen Estates along Caminito Mendiola.

Public Safety Issue

1. Would implementation of the Pacific Highlands Ranch Plan expose people to potential health hazards?

1) Issue

Would implementation of the Pacific Highlands Ranch Plan expose people to potential health hazards?

Impacts

a) Electromagnetic Fields

Studies of the potential for adverse public health effects due to electromagnetic fields are inconclusive at this point. A statement or conclusion of impacts would be speculative. In accordance with CEQA Guidelines Section 15145, the known information about electromagnetic fields is summarized above and no conclusion is reached.

b) Hazardous Materials

The potential exists that future residents of the project area could be exposed to unhealthy levels of pesticides or herbicides that have contaminated the underlying soils when applied for agricultural purposes. No operations on-site are currently on record with the County as permitted hazardous materials users. However, if the levels of pesticides applied for past agricultural operations have contaminated the soils the impacts to future residents of the project area could be significant.

Land uses planned for the subarea consist of single- and multi-family residential, recreational, and school and park uses. These types of uses do not typically generate significant amounts of hazardous materials.

Although the details of the proposed commercial uses are not known at this time, they are not expected to store, use, or generate significant quantities of hazardous materials which could result in contamination of soils, water, or air.

c) Vectors

The existing water reservoir/pond located in Deer Canyon in the southern portion of the site would remain within the subarea with the implementation of the proposed land use plans. The nearest existing residence is at least 1,800 feet from the pond and the nearest proposed development in either Subarea Plan 1 or 2 is more than 3,600 feet away; therefore, the potential risk for public health and safety due to exposure to disease-bearing vectors (mosquitoes) is considered less than significant.

The collection of storm water runoff in the on-site detention basins could cause operational and aesthetic problems such as algae blooms, eutrophication (oxygen depletion), and odors. The proper maintenance of retention basins would be necessary to minimize the risk of mosquito breeding.

Significance of Impacts

a) Electromagnetic Fields

Studies of the potential for adverse public health effects of electromagnetic fields are inconclusive. A statement or conclusion of impacts would be speculative. In accordance with CEQA Section 15145, the known information about electromagnetic fields is summarized and no conclusion of significance is reached.

b) Hazardous Materials

Future developments shall provide a hazardous soils assessment to be conducted by a qualified professional to determine if hazardous soils are present on-site. If hazardous soils are found, a remediation plan shall be prepared and approved by the County Department of Environmental Health for the project. The recommendations of the remediation plan shall be implemented as a condition of project approval.

c) Vectors

Because the proposed project contains on-site detention basins to serve the subarea, the potential for public health and safety impacts to future residents within the project site are considered potentially significant.

Mitigation, Monitoring, and Reporting**a) Electromagnetic Fields**

No mitigation would be required.

b) Hazardous Materials

No mitigation would be required.

c) Vectors

Mitigation measures for potential increased mosquito populations which will decrease potentially significant impacts to below a level of significance are described below. Prior to any grading activities, the applicant shall provide a letter from the County Environmental Health Department Vector Surveillance and Control Division (VSCD) to the environmental review manager of LDR verifying that a vector control program has been designed. Elements of the program may include, but not be limited to the following:

1. The detention basins shall be kept free of debris, high concentrations of nutrients which could contribute to alga blooms, and organic floatage. Any emergent vegetation (e.g., cattails and bulrushes) shall be removed only as necessary to control the mosquito problem.
2. Non-natural runoff to the detention basin shall be minimized by proper drainage patterns to prevent excessive organic material from entering.
3. Although the above measures are designed to minimize the potential for mosquito breeding in the on-site retention basins and control mosquito populations, active control measures may be necessary at times. This would include the application of a

mosquito fog or insecticide spray. The use of this measure should be minimized to avoid reducing populations of other insects. Use of spray application shall be minimal and shall require coordination with VSCD, USFWS, and CDFG.

4. Maintenance of the detention basins shall be the responsibility of a homeowners association or similar maintenance district.

O. Population

Existing Conditions

Pacific Highlands Ranch, with few scattered residences, is essentially undeveloped. Buildout of Pacific Highlands Ranch under the current A-1-10 zoning under PRD regulations would allow approximately 260 dwelling units. The approved Del Mar Highlands Estates and Rancho Glen Estates projects will account for approximately 201 residential units, with an estimated population of 523 (assuming 2.6 persons per household).

According to the 1990 U.S. census, approximately 2.5 million people reside in the San Diego region. From 1980 to 1990, the average annual growth rate was 3.0 percent, as compared to the national rate of 1.0 percent and the state of California growth rate of 2.3 percent.

The entire NCFUA including Pacific Highlands Ranch is located within the North City Major Statistical Area (MSA), one of seven MSAs defined by SANDAG that cover the San Diego region. The North City MSA population grew from 436,352 in 1980 to 569,992 in 1990, a 30.6-percent increase. The January 1, 1996 estimate is 630,774, a 10.7-percent increase from 1990. This represents the largest numeric increase over both time periods of all the MSAs. As home to several large urbanizing communities, such as Carmel Valley and Sabre Springs, this MSA captured 21 percent of the region's population growth during the 1980s and 32 percent since 1990.

SANDAG is the regional agency responsible for preparing population, housing, and employment projections for the San Diego region. As shown in Table 4O-1, the SANDAG Series 8 Regional Growth Forecast (1997b) projects population, housing, and employment data to the year 2015, based on 1990 census data and general plan information available at that time.

Population Issue

1. Would the proposed implementation of either Plan 1 or 2 for Pacific Highlands Ranch alter the planned location, distribution, density, or growth rate of the population?

TABLE 40-1
SERIES 8 REGIONAL GROWTH FORECAST NORTH CITY MSA

	1990	2000	2005	2015	1990-2015 Change	Percent Change
Population	569,992	687,571	741,257	820,904	250,912	44%
Employment	387,733	401,598	436,453	482,796	95,063	24.5%
Single-family residential housing units	148,614	159,649	170,275	187,141	38,527	25.9%
Multi-family residential housing units	80,139	94,487	106,478	129,192	48,053	60%
Persons per household	2.54	2.71	2.68	2.61	+0.07	2.7%
Developed acres (all uses)	83,833	89,104	95,963	114,211	30,379	36.2%
Vacant developable acres	36,254	30,982	24,123	5,875	-30,379	-83.8%

SOURCE: SANDAG Series 8 Interim Forecast (5/95).

1) Issue

Would the proposed implementation of either Plan I or II for Pacific Highlands Ranch alter the planned location, distribution, density, or growth rate of the population?

Impact

The final NCFUA Framework Plan EIR identified the addition of 35,000 people to the North City Future Urbanizing Area as a potentially significant, long-term impact. These residents would have lived elsewhere in the region had the NCFUA not been available for development. Although population growth itself may not be a significant adverse impact, substantial new population centers and associated activity concentration can result in other indirect impacts, including inadequate public services and facilities, traffic congestion, and land use incompatibility.

The proposed Pacific Highlands Ranch Plan includes the development of 4,974 residences; however, the number of residential units could increase to 5,456 if the private high school site is not developed as a school, and the optional elementary and junior high schools are not needed. These sites would be redesignated for residential use.

Implementation of either plan for Pacific Highlands Ranch would not attract a buildout residential population that significantly exceeds that which exists or would result with buildout under existing regulations. The proposed Pacific Highlands Ranch plans call for a total of 5,456 residential units and 500,000 square feet of retail/commercial/employment use. It is expected that development would occur over a 15- to 20-year period beginning in 1998 or 1999, resulting in an average increase of 273-364 housing units and 701-946 people per year. However, the rate of buildout per year would be driven by market forces as well as population changes and could fluctuate considerably from year to year.

The location, distribution, and density of the resident population as proposed in either of the two proposed plans for Pacific Highlands Ranch would be compatible with surrounding existing and planned land uses. Either plan would maintain a relatively low population concentration, when compared to the adjacent communities of Carmel Valley or Peñasquitos. Subarea development would infill the surrounding uses and would not promote "leapfrog" development. In addition, approximately one-half of the subarea would be retained as open space in the Environmental Tier. Assuming a 15- to 20-year buildout, the average annual population increase of 701-946 people in the subarea would not have a significant impact on the regional growth rate. Finally, following its adoption, environmental certification, a vote of the electorate, and a phase shift, the Pacific Highlands Ranch Plan would itself define what would be the planned location, distribution, density, and growth rate of the population in the area.

Significance of Impacts

The Pacific Highlands Ranch Plan and the proposed phase shift from Future Urbanizing to Planned Urbanizing (if approved) would remove a barrier to population growth in the subarea and the rest of the NCFUA. However, assuming a 15- to 20-year buildout, with an annual population increase of 701-946 people, no significant impacts on the planned growth rate for the region are expected. In addition, the Pacific Highlands Ranch Plan includes an effective and comprehensive development phasing program, which would preclude any significant indirect impacts to public services and facilities or traffic congestion.

The proposed project is part of a comprehensive subarea planning program designed to anticipate and resolve indirect impacts caused by increased population. In addition, the Pacific Highlands Ranch Plan includes a strong phasing program to stage development to meet the demand for transportation and public services and thus avoid indirect impacts.

Mitigation, Monitoring, and Reporting

Since the identified population impacts are not considered significant, no other mitigation measures are required or recommended.

Chapter Five

Growth Inducement

Section 15126(g) of the CEQA Guidelines describes growth-inducing impacts as “the ways in which the proposed project could foster economic or population growth, or the construction of new housing, either directly or indirectly in the surrounding environment.” If a project has characteristics which may “encourage or facilitate other activities that could significantly affect the environment, either individually or cumulatively,” then this aspect of the project must be discussed as well. The following discussion primarily focuses on two factors: (1) potential for stimulation of development of property at a greater density than allowed by existing planning and zoning; and (2) a change in the timing of development resulting from extension of public services or road access into an area where previously unavailable.

The 2,650-acre Pacific Highlands Ranch project site is located in an area of approximately 12,000 acres identified as the North City Future Urbanizing Area. Pacific Highlands Ranch of the NCFUA adjoins Subarea II to the west, the Carmel Valley community to the south, portions of the Fairbanks Ranch (City of San Diego) and San Dieguito (County of San Diego) communities to the north, and agricultural and undeveloped land in Subarea IV to the east.

All lands in the NCFUA are designated as agricultural (with A-1-10 zoning) on an interim basis to prevent premature urbanization and protect environmental and fiscal resources by precluding leapfrog development. A Framework Plan for the NCFUA has been adopted by the City as an amendment to the General Plan. This plan would permit the development of up to 14,780 residential units in the NCFUA, including 5,460 units within Pacific Highlands Ranch. Implementation of the Framework Plan is dependent on a phase shift from “future urbanizing area” to “planned urbanizing area.”

According to the City of San Diego’s Progress Guide and General Plan, the Future Urbanizing designation may be removed upon one of the following:

- The Urbanizing area and Planned Urbanizing area communities of the city approach buildout, or

- Significant opportunities arise to implement the City's balanced housing, land use, or other goals.

At such time as it is determined that one of the two situations has occurred, a General Plan Amendment for a phase shift may be prepared. If approved by the City Council, the amendment would be brought to the voters in a city-wide election for final action in accordance with Proposition A, the Managed Growth Initiative (R-264708, 12-16-85). A subarea plan for Pacific Highlands Ranch must also be prepared and adopted by the City prior to development at the densities permitted in the Framework Plan. See the Land Use discussion in Section 4.A for additional background information on phase shift and subarea planning requirements. A phase shift for the NCFUA was put to the voters on the June 1994 ballot and did not pass.

The Growth Inducement section of the Final EIR for the NCFUA Framework Plan (City of San Diego 1992a) concluded that implementation of the Framework Plan would have a significant growth-inducing impact. That document, which has been incorporated by reference into this MEIR, stated that implementation of the Framework Plan would:

- Foster economic growth through provision of employment opportunities and construction activities related to development of the area;
- Foster population growth with the area and through the provision of additional housing; and
- Remove obstacles to growth by providing roadways, utilities, water, and sewer service to previously unserved areas.

These statements are also true for the proposed Pacific Highlands Ranch plans. However, the NCFUA Framework Plan addressed buildout of Pacific Highlands Ranch with up to 5,460 dwelling units and 400,000 square feet of commercial and office space. Both proposed subarea plans (Plan 1 and Plan 2) are consistent with the Framework Plan.

Nevertheless, the proposed Pacific Highlands Ranch plans would still remove obstacles to growth by providing infrastructure facilities in previously undisturbed areas, as described in the Framework Plan EIR. In conclusion, either of the proposed subarea plans would have a growth-inducing impact on the area.

Chapter Six

Cumulative Effects

Cumulative impacts are those impacts which by themselves are not significant but, when considered with other impacts occurring from other projects in the vicinity, would result in a total or cumulative impact. As defined in the CEQA Guidelines, a cumulative impact results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable projects. While an EIR should discuss the “severity and likelihood of occurrence” of cumulative impacts, “the discussion need not provide as great detail” as the discussion of the proposed project’s effects but “should be guided by the standards of practicality and reasonableness” (CEQA Guidelines Section 15130). In addition, reasonable mitigation measures should be discussed. However, CEQA acknowledges that “with some projects, the only feasible mitigation for cumulative impacts may involve the adoption of ordinances or regulations rather than the imposition of conditions on a project-by-project basis.”

This section examines the cumulative effects on a regional and/or local basis depending on the nature of the impact. Regional evaluations are based on areawide planning documents and forecasts. For the purposes of this analysis, the projects considered include (1) projects located within the NCFUA proposing development under the current zoning; (2) projects within the NCFUA that require or are proposing a phase shift; and (3) private and public projects adjacent to or in the near vicinity of the NCFUA. Table 6-1 provides a summary listing of projects considered in the cumulative analysis and the discussion below provides a brief narrative description of the selected existing and proposed projects in the defined region.

A. Cumulative Projects Considered

a) Subarea I of Framework Plan

Located three miles northeast of Pacific Highlands Ranch, Subarea I of the adopted Framework Plan consists of Area 1A and 1B. According to the Framework Plan, Area 1A consists of approximately 4,680 acres. Projected land uses and acreages identified for

**TABLE 6-1
CUMULATIVE PROJECTS**

Name of Project	Proposed Development	Status
a) Subarea I of Framework Plan	Various residential densities, open space, and mixed use	Subarea plan in process
b) Subarea II of Framework Plan	Estate and low density residential use and open space	No proposed plan
c) Subarea IV of Framework Plan	Various residential densities, open space, and mixed use	Approved
d) Subarea V of Framework Plan	Various residential densities and open space, and school and park	Approved
e) Bame Parcel Subdivision	4 dwelling units	Approved
f) San Andres West	Residential	Approved
g) State Route 56	Connects I-5 and I-15	East and west segments built; middle segment proposed
h) Multiple Species Conservation Program	Regional habitat conservation plan	Approved
i) Del Mar Highlands Estates	Within Subarea III - residential low density	Approved
j) Carmel Valley Neighborhood 8	CVREP channel with residential uses	Approved
k) Carmel Valley Neighborhood 8A	Precise Plan - dwelling units	Proposed
l) Carmel Valley Neighborhood 8B	Very low density residential	Proposed
m) Carmel Valley Neighborhood 8C	Low density dwelling units	Approved
n) Carmel Valley Neighborhood 10	Various residential densities, neighborhood commercial, open space, school, and park	Approved
o) Rhodes Vesting Tentative Map	Dwelling units	Approved
p) Showpark Equestrian Center	Equestrian center	Existing
q) San Dieguito Lagoon Restoration	Wetlands restoration	In process
r) 4S Ranch	Various residential densities, neighborhood commercial, schools, park, and open space	Approved
s) Fairbanks Ranch	Various residential densities, neighborhood commercial, open space, school, and park	Approved
t) Santa Fe Valley	Residential golf course, equestrian center, neighborhood commercial, and open space	Approved
u) Seabreeze Farms Estates	Residential	Approved
v) Bougainvillea	Residential golf course	Approved

Area 1A in the Framework Plan included designations of estate (352 acres), very low (2,071 acres), moderately low (156 acres), peripheral (32 acres), local mixed-use (20 acres), and open space (2,050 acres).

Within Subarea I, a revised vesting tentative map was approved in 1995 for 3,690 acres of this site known as Black Mountain Ranch. This map includes plans for 1,121 dwelling units, one 250-acre 18-hole golf course, one 300-acre 18-hole golf course, one 30-acre community park, two 5-acre parks, and 2,171.2 acres of natural open space. The plan also includes a reclaimed water reservoir, potable water reservoir, fire station, community hall, library, senior citizen center, day-care center, church, recreation center, and elementary, middle, and high school sites. The project will construct an extension of Carmel Valley Road from Black Mountain Road to the westerly segment of SR-56. Approximately 893 acres would be subject to future development under existing land use policies or, after a phase shift, under Framework Plan policies. No construction has begun in Area 1A.

According to the Framework Plan, Area 1B consists of an estimated 500 acres. Projected land uses and acreages identified in the Framework Plan for Subarea 1B include residential very low (76 acres), core residential (79 acres), peripheral (123 acres), mixed-use core (41 acres), employment (42 acres), community park (35 acres), and open space (100 acres). A Supplemental EIR and subarea plan are currently being prepared for the North and South Village plans, the resort hotel, and the perimeter properties within Area 1B.

b) Subarea II of Framework Plan

Located approximately 3.5 miles west of Subarea IV, Subarea II encompasses approximately 830 acres that is bisected by the San Dieguito River. The Framework Plan identifies a significant portion of Subarea II as an Environmental Tier land use in conjunction with the San Dieguito River Valley Regional Park FPA. Approximately 580 acres would be designated as open space and 250 acres for development, on which 230 units are planned.

c) Subarea IV of Framework Plan

This 1,330-acre subarea with an approved subarea plan is located north and east of Subarea V. Approximately 270 acres are shown for open space and 1,060 acres for development. Uses within Torrey Highlands include an estimated 2,850 residential units, a school site, employment center, and other mixed uses.

d) Subarea V of Framework Plan

Located immediately west of Subarea IV, proposed development on Subarea V (Del Mar Mesa) would consist of rural residential, a resort site, and over 1,500 acres of dedicated open space.

Del Mar Mesa consists of 2,042 acres, located south of State Route 56, north of the Los Peñasquitos Canyon reserve, between Carmel Country Road and Camino Ruiz. Projected land uses include residential estates, very low density residential, peripheral space, local mixed-use, and open space. A maximum of 685 dwelling units are permitted within Subarea V. A subarea plan was approved for Subarea V.

e) Bame Parcel Subdivision

The approved Bame parcel subdivision is within Pacific Highlands Ranch includes 17 acres located along the east side of Old El Camino Real, approximately 0.2 mile south of the Del Mar Highlands site. Proposed development in the Bame project includes four estate residential homes on 13 acres (with lot sizes ranging between 2.0 and 4.5 acres) and 4 acres of open space.

f) San Andreas West

The San Andres site includes 17.6 acres located north of Via de la Valle and west of San Andres Drive, approximately 1.1 miles northwest of the Del Mar Highlands Estates property. The approved development at San Andres West includes 47 single-family residential lots, two lots for private streets (1.66 acres), and four slope (open space) lots (8.54 acres). On-site excavation includes 80,000 cubic yards of balanced cut and fill (i.e., with no net material import or export). A Mitigated Negative Declaration (DEP No. 94-0437) was approved for the proposed project in December 1994 (Planning Commission Resolution No. 2152-1-PC). Key environmental issues identified for the San Andres West project in that document included biological resources and erosion/sedimentation. The project is under construction.

g) State Route 56

This six-lane state highway would be extended south of Del Mar Highlands Estates through Subareas III, IV, and V of the NCFUA, connecting with existing segments of SR-56 located to the east and west of the NCFUA. Caltrans originally evaluated seven alternative alignments for SR-56 in a Project Work Program analysis. Caltrans is currently preparing a Project Report for a more in-depth analysis of the remaining two alternative alignments for SR-56. The City of San Diego is the lead agency for

preparation of the environmental documentation for this project. The City has completed an environmental constraints analysis for the project and is initiating an environmental impact report.

h) Multiple Species Conservation Program

The City of San Diego and other land use jurisdictions in southwestern San Diego County began development of the MSCP to meet the Metropolitan Wastewater Department's need to mitigate the direct biological impacts associated with mandated improvements to the region's sewage treatment facilities. The MSCP effort was also directed toward mitigating the secondary biological impacts associated with projected growth in the region.

A final joint federal environmental impact statement and state EIR was released in January 1997 on the MSCP Plan and the MSCP was adopted by the City of San Diego in March 1997. On July 14, 1997, the City of San Diego signed an Implementing Agreement with the U.S. Fish and Wildlife Service and California Department of Fish and Game. The Implementing Agreement is the contract between the City and the wildlife agencies, which outlines the obligations and commitments made for the successful completion of the MSCP. The agreement has been signed by all parties and is effective July 17, 1997.

The Implementing Agreement now allows the City of San Diego to issue Incidental Take Authorizations under the MSCP. The ITAs replace the Interim Habitat Loss 4(d) permit that was established in August 1994 for permitting of take of the California gnatcatcher and its associated habitat, coastal sage scrub.

Using the MSCP Plan as a framework plan, subarea plans may be prepared by local general-purpose agencies. The City of San Diego has prepared a subarea preserve plan to guide implementation of the MSCP Plan within its corporate boundaries. The project site is within the northern subarea of the City's subarea plan as part of the Future Urbanizing preserve area. Within the northern subarea, the City proposes to "preserve two-thirds of the Los Penasquitos Lagoon/Canyon/Del Mar Mesa core area within its jurisdiction" (City of San Diego 1996c). To do so, "[p]reserve areas would be acquired or a conservation easement applied, as necessary, to assure wildlife movement and habitat restoration/protection." The subarea plan contains a list of specific guidelines for the proposed NCFUA subarea, including Pacific Highlands Ranch. The proposed Pacific Highlands Ranch Plan has been deemed "functionally consistent" with the MSCP preserve area.

i) Del Mar Highlands Estates

This approved 399-acre project is located within Pacific Highlands Ranch near the western boundary. The 172-unit development is consistent with the underlying zoning and consists of single-family residential units, additional affordable housing units and open space.

j) Carmel Valley Neighborhood 8

Neighborhood 8 is an approved precise plan north of Neighborhood 8A covering approximately 350 acres. This precise plan consists of the Carmel Valley Restoration and Enhancement Plan channel, low-density residential, and open space uses.

k) Carmel Valley Neighborhood 8A

The 390.2-acre Carmel Valley Neighborhood 8A precise plan area is located south of Neighborhood 8 and west of Neighborhood 10 and Subarea V. Proposed land uses have included residential units ranging from very low density to low-medium density, elementary school/community park site, and open space. Precise plans have been proposed for Carmel Valley Neighborhood 8A in both 1994 and 1995 and Final EIRs have been completed. In late 1995, Neighborhood 8A was a component of the 1995 City Manager's Neighborhood 8A Compromise Plan (DEP No. 87-0211, 91-0899, and 94-0576) which included a revised Neighborhood 8A Precise Plan along with other parcels within the North City Future Urbanizing Area. A Final EIR was prepared for the Neighborhood 8A Compromise Plan, and a noticed public hearing was held on the project on October 31, 1995. The Final EIR for the Compromise Plan examined various reduced project and circulation pattern alternatives. No action was taken on any of the Compromise Plan project components by the City Council. The approved Neighborhood 8C Precise Plan removed 39.9 acres from the southwestern portion of Neighborhood 8A. Currently a replanning effort is under way for Neighborhood 8A and a draft precise plan and EIR are being prepared.

l) Carmel Valley Neighborhood 8B

Neighborhood 8B has initiated the processing of a precise plan for the existing Arroyo Sorrento area, north and west of Neighborhood 8A.

m) Carmel Valley Neighborhood 8C

Neighborhood 8C represents a precise planning area which was formerly within Neighborhood 8A. The approved precise plan and VTM for Neighborhood 8C covers 39.87 acres in the southwestern portion of Carmel Valley, located between Carmel Mountain Road and Arroyo Sorrento Road. Developments and acreage allotments within the this area consist of detached single-family residences and open space.

n) Carmel Valley Neighborhood 10

An amendment of the approved Carmel Valley Neighborhood 10 Precise Plan has been adopted. The amendment involved the addition of 128 single-family residential units at four locations throughout the precise plan. These additional residential units would increase the maximum allowable number of units for the entire precise plan from 1,438 to 1,566, an increase of approximately 9 percent. Modification of the approved precise plan grading concept and the grading associated with the approved vesting tentative maps would be required to create building pads to accommodate the additional single-family units. The area to be disturbed by grading throughout the entire precise plan would increase by 22.3 acres.

o) Rhodes Vesting Tentative Map

This approved vesting tentative map is located adjacent to and south of The Villas project site. It is within the Carmel Valley community plan area and consists of 42 single-family residential lots on 10.2 acres. The final EIR for the project identified significant, unmitigated cumulative impacts to biological resources, landform alteration/visual quality, and hydrology/water quality. All the identified direct environmental impacts were mitigated. The project was approved in February 1994.

p) Showpark Equestrian Center

The Showpark Equestrian Center is located on 64 acres southwest of the intersection of El Camino Real west and Via de la Valle. The western boundary of the property is adjacent to The Villages project site. The entire site is disturbed, with a show ring, public viewing grandstands, horse boarding facilities, and parking.

q) San Dieguito Lagoon Restoration

The Lagoon Restoration Project is part of an extensive study being conducted for the western portion of the San Dieguito River valley. Analysis to date includes a baseline

biology study, conceptual restoration alternatives, and a resources summary for the lagoon. The conceptual alternatives study identified 14 possible alternatives. Of these 14, three are presently being studied further and modeled hydrologically. Part of the wetlands restoration will be implemented by Southern California Edison as mitigation for impacts to ocean habitat from the San Onofre Nuclear Power Plant ocean discharge.

r) 4S Ranch

Located south of the project area, the 3,525-acre 4S Ranch is divided into a 634-acre parcel designated as Current Urban Development Area and a 2,981-acre Future Urban Development Area. The OMWD Phase 1 pipeline includes a 10,000-foot extension along Artesian road to the 4S Ranch plan area. The proposed overall density of the 2,981-acre parcel is 1.85 du/acre. The project will have a significant and mitigable biological resource impacts to 16-acre of wetlands, 186 acres of sensitive upland habitats (169 acres of coastal sage scrub), 5.5 acres of riparian/scrub woodland and wetland habitat, federal/state-listed species, federal C1/C2 candidates and CNPS List 1B, 2 and 4 plant species, and the endangered California gnatcatcher. Significant and mitigable impacts would occur to 53 important or potentially important resources sites, steep slopes within the La Jolla Valley, traffic and circulation, geological, seismic and soils conditions, hydrology/water quality, noise and air quality.

s) Fairbanks Ranch

The community of Fairbanks Ranch along with Del Mar Country Club exists along much of the northern border of Pacific Highlands Ranch in the County of San Diego. The bulk of the land is designated as open space, with the remaining land developed and being developed with estate single-family residences and the golf course.

t) Santa Fe Valley

Located north of the project site, the Santa Fe Valley SPA encompasses approximately 3,163 acres. Approximately 1,404 acres would be preserved as undisturbed permanent open space. Another 374 would be developed mainly as a golf course to act as a buffer between the more sensitive natural open space areas and the more intensive urban development proposed for the remainder of the site. The specific plan proposes development of up to 1,200 residential dwelling with variable densities from 1du/6ac to 4du/ac. In addition to the previously mentioned golf course, a resort-hotel, a 9-hole executive golf course, a congregate care facility, a neighborhood commercial center, community facilities, and supporting infrastructures area also proposed as part of the Specific Plan. Significant environmental impacts identified in the EIR include biology, cultural resources, landform/visual quality, traffic/transportation/circulation, noise, air

quality, geology/oils, hydrology/storm drainage/flood control/ water quality, and public facilities (fire).

u) Seabreeze Farms Estates

This 72-acre property is located in the southwestern portion of Pacific Highlands Ranch; however, in November 1996, voters approved a phase shift to remove the project site from the Future Urbanizing area. This approved residential project includes 300 units, an 8-acre equestrian center, and approximately 35 percent of the property dedicated to open space.

v) Bougainvillea

Within Subarea V is the 383-acre Bougainvillea project site, approximately two miles southeast of Pacific Highlands Ranch. This project, which has been approved, includes an 18-hole golf course, restored and natural open space, clustered residential dwelling units (at a density of one unit per four acres), and affordable housing units. A second phase of a resort hotel is being planned, and a third phase of a mixed-use development along Shaw Ridge Road may also be included in this plan.

B. Cumulative Impacts

The following analysis includes assessment of cumulative effects associated with implementation of the NCFUA subarea plans, as well as consideration of additional local projects. Table 6-2 describes the potentially significant cumulative impacts. The major issues are discussed below.

a) Land Use

Cumulative land use impacts identified in the 1992 EIR on the NCFUA noted that the NCFUA was not consistent with the currently proposed surrounding existing and planned land uses in terms of density and road alignments. Also, implementation of the plan would contribute to a cumulative RPO impact. Only adoption of the RPO alternative would avoid the projects cumulative land use impacts.

b) Transportation/Traffic Circulation

The NCFUA EIR found that the project had a significant cumulative effect on regional degradation of traffic levels of service by incremental daily traffic additions. The cumulative traffic conditions with development of the subarea would result in some street

**TABLE 6-2
SIGNIFICANT CUMULATIVE EFFECTS**

Issue Area	Occurrence of Significant Cumulative Effects		Comments
	NCFUA	NCFUA Other Local Projects	
Land Use	Yes	Yes	Potential incompatibilities between the proposed project and existing and planned land uses, roadways, and construction operations. Inconsistencies with established plans and policies relative to residential densities and commercial use.
Transportation/ Traffic Circulation	Yes	Yes	Short-term impacts within NCFUA until build-out of circulation system. Regional impacts to I-5 link between I-5/I-805 junction and Del Mar Heights Road.
Hydrology/ Water Quality	Yes	Yes	Reduction of regional and local water quality associated with increased erosion and sedimentation, potential discharge of hazardous materials during construction, generation of urban pollutants, and use of reclaimed water.
Landform Alteration/Visual Quality	Yes	Yes	Alteration of existing character and visual quality through urban development, modification of landform and unique topographic features, and potential loss of mature, distinctive, or landmark trees.
Cultural Resources	Yes	Yes	Contribution to regional and statewide trend toward the loss of cultural resources due to expanding urbanization.
Air Quality	Yes	Yes	Generation of short-term (construction) and long-term vehicle emissions within a non-attainment area.
Geology/Soils	Yes	Yes	Increase in potential erosion rates in association with concurrent regional grading activities.

TABLE 6-2
SIGNIFICANT CUMULATIVE EFFECTS
 (continued)

Issue Area	Occurrence of Significant Cumulative Effects		Comments
	NCFUA	NCFUA Other Local Projects	
Natural Resources/ Agriculture	Yes	Yes	Loss of restriction of access to valuable agricultural or mineral resource sites.
Paleontology	Yes	Yes	Proposed grading in geologic formations with variable (including high) potential for occurrence of paleontological resources.
Noise	Yes	Yes	Project-related traffic and urban uses will increase cumulative regional and local baseline noise levels. SR-56 is a major contribution to cumulative noise impacts.
Public Facilities and Services	Yes	Yes	Proposed residential and other uses will increase demand for public services and facilities in concert with other regional development.
Water Conservation	Yes	Yes	Additional requirements for potable water use and sewage generation associated with proposed development.

segments and intersections reaching unacceptable levels of service. While traffic from Pacific Highlands Ranch would contribute only a portion of the trips to these unacceptable street segment and intersection conditions, any contribution to a street segment or intersection operating at an unacceptable level would be cumulative significant. Additionally, the cumulative traffic would add to the traffic conditions on the area's freeways, resulting in a significant impact.

c) Biology

The area in which the cumulative projects are located comprises approximately 19,000 acres of undeveloped, agricultural, or low rural density housing. This large area supports a wide variety of biological species and habitats and, by nature of its size, is an important biological resource within the City and County of San Diego.

Implementation of past, proposed, and reasonably foreseeable projects would contribute to the loss of each of these habitats, but primarily coastal sage scrub and non-native grassland and southern mixed chaparral. Loss of coastal sage scrub habitat would in turn affect the wildlife species which utilize this habitat, such as the coastal California gnatcatcher, San Diego horned lizard, and orange-throated whiptail. Large open blocks of non-native grasslands, among other habitats, provide raptor foraging habitat. The cumulative loss of these habitats associated with these projects would be considered a cumulatively significant impact.

With the implementation of the MSCP, the predominant habitats (Diegan coastal sage scrub, non-native grassland [formerly active agricultural lands], disturbed areas [current nursery activities], southern mixed chaparral, riparian woodland, and southern oak woodland) would be preserved in large, contiguous areas of habitat in perpetuity. These areas would also be managed, restored, and/or revegetated for long-term persistence through implementation of the MSCP. Cumulative impacts to grasslands would remain significant since the habitat is not significantly conserved.

The conservation of open space and restoration or enhancement of disturbed habitat provided by implementation of the MSCP guidelines and mitigation provided in the proposed project would serve to lessen the potential cumulative biological impacts to a level below significance. However, loss of any riparian (wetland) habitat is considered cumulatively significant and not mitigated.

The plans' biological resources impacts can be avoided with implementation of the No Project alternative and mitigated to below a level of significance by adoption of a RPO alternative. These alternatives are discussed in Chapter 8 of this EIR.

d) Hydrology/Water Quality

The 1992 NCFUA EIR determined that development in the NCFUA would cause significant cumulative impacts to hydrology and water quality from increased runoff, increased erosion potential and the transport of waterborne contaminants.

Also, development of projects outside the NCFUA would increase the amount of erosion from exposed soil areas which contributes to sediment-laden runoff into local drainage courses. Erosion can be destructive to the immediate area and sedimentation can clog waterways and downstream wetland and lagoon areas. Measures incorporated into the projects decrease erosion. These include limiting the grading to the dry season and immediate stabilization of manufactured slopes. These measures to reduce erosion during construction would be combined with long-term measures, such as sedimentation basins, to reduce the erosion potential. However, the incremental areawide contributions of each project are considered cumulatively significant.

Runoff from urban areas can also degrade downstream water quality. Runoff water from the project areas can contain contaminants, such as pesticides, fertilizers, and hydrocarbons. Implementation of BMPs, as discussed in the Hydrology/Water Quality chapter of this MEIR, would lessen this impact. The increased runoff from impervious surfaces to the lagoons along with additional pollutant burden would result in a cumulative significant impact which is not totally mitigated.

The plans' water quality impacts can be avoided only with implementation of the No Project alternative. This alternative is discussed in Chapter 8 of this EIR.

e) Landform Alteration/Visual Quality

The 1992 NCFUA EIR determined that the NCFUA would overall transform the landscape of the project area and lead to significant cumulative effect of open space conversion to developed urban areas. The current combination of proposed projects in the area would alter the existing landforms and visual setting from that of open expanses of rolling hills, valleys, and mesas typical of rural agricultural areas to that of clustered residential and mixed-use areas separated by open space and four- and six-lane roads. By providing circulation roads, local access roads, residential building pads, commercial development, and supporting facilities, terraced and manufactured slopes would be substantially increased from prior agricultural use. The cumulative change in landforms and visual setting from development of the subarea would be significant and not mitigated.

The substantial change in aesthetic character described above would occur under both land use scenarios. This change represents a significant direct and cumulative impact

from on- and off-site locations. The development of the project site would incrementally contribute to the change the aesthetic character of the subregion in conjunction with the existing and planned development in Carmel Valley and Subareas IV and V.

Although both subarea plans have been designed to minimize impacts to steep slopes and strict compliance with the encroachment thresholds in the development regulations of RPO would require a project redesign. Both plans' inconsistency with the RPO encroachment provisions and landform alteration impacts can be avoided with implementation of the No Project alternative and mitigated to below a level of significance by adoption of a RPO alternative. These alternatives are discussed in Chapter 8 of this EIR.

f) Air Quality

The San Diego area is a nonattainment basin for ozone resulting from emissions of reactive organic gases from autos. Any increase in emissions from automobiles is a cumulatively significant impact. The San Diego Air Pollution Control District is responsible for strategies to reduce air pollution in the air basin and bases its projections of future air quality and pollutant emissions on population and employment growth estimates developed by SANDAG. New housing typically does not have a significant adverse effect on strategies to improve air quality if the project is consistent with the assumptions used in the APCD projection model and does not increase dependency on automobile trips relative to other locations.

SANDAG Series 8 population projection takes into account development in the Framework Plan. Therefore, the proposals for the area are generally consistent with the SANDAG population and air pollutant emission forecast to the extent that the residential development would accommodate new residents in the area or increase the number of automobile trips or vehicle miles traveled. The 1992 NCFUA EIR assessed that the NCFUA would contribute a significant cumulative impact because project-generated traffic would add incrementally to the existing degraded air quality. In the near term, development in the area would be automobile dependent, as employment centers, commercial and retail services, and alternative transit services are not currently developed in the area.

Additionally, the City of San Diego specifies thresholds for the determination of significant cumulative air quality impacts. The number of residential units proposed would exceed the City's thresholds. Therefore, under the City's guidelines, the proposed project would contribute a significant cumulative air quality impact. Both plans' inconsistency with City air quality threshold provisions can be avoided with implementation of the No Project alternative. These alternatives are discussed in Chapter 8 of this EIR.

g) Geology

Future grading activities for the implementation of specific development projects in the NCFUA, including Pacific Highlands Ranch, will result in potentially significant increases in soil erosion. In combination with other regional development projects, increased erosion impacts are considered cumulatively significant.

h) Natural Resources

The region considered in this cumulative analysis has historically been used for agriculture. The 1992 NCFUA Framework Plan EIR identified a significant cumulative impact where the project would contribute incrementally to the regional statewide and national loss of prime agricultural lands and preclusion from future sand and gravel mining in potential mineral resource areas.

The proposed Pacific Highlands Ranch Plan will incrementally add to the region's losses of important agriculture lands and mineral resource areas. This loss is considered cumulatively significant.

i) Public Facilities and Services

The above projects would result in approximately 22,192 single- and multi-family residences. Public services in the area of the project (e.g., schools, fire, police) would not be able to provide for the cumulative new demand with existing facilities, which would constitute a significant cumulative impact. Facilities proposed to serve these residences include sites for schools, fire stations, police stations, one library, commercial areas, community parks, and neighborhood parks. These facilities, combined with existing and planned facilities in Rancho Peñasquitos and Carmel Valley, would adequately meet the needs of these residences and mitigate the adverse effects.

The projects would increase the solid waste generated and the need for landfill capacity. The existing landfill capacity would be used up in 2006 with an estimated increase of 6 percent per year in solid waste generation. Until additional landfill capacity is identified, increased generation is a significant cumulative impact. The City is developing facilities and programs to reduce the waste stream by recycling, source reduction, and composting. Projects that do not facilitate these strategies contribute to the significant impact.

j) Population

The Pacific Highlands Ranch Plan (as well as the other subareas) and the proposed phase shift from Future Urbanizing to Planned Urbanizing (if approved) would remove a barrier

to population growth in the subarea and the rest of the North City Future Urbanizing Area. However, because growth will occur over an extended period of time, no significant impacts on the planned growth rate for the region are expected. In addition, the Pacific Highlands Ranch Plan includes an effective and comprehensive development phasing program, which would preclude any significant indirect impacts to public services and facilities or traffic congestion.

Although development of Pacific Highlands Ranch will likely displace a local undocumented migrant worker population, because the population is illegal and the camps are illegal, development of the subarea cannot be considered a significant impact under CEQA.

Chapter Seven

CEQA Mandatory Discussion Areas

A. Any Significant Irreversible and Unavoidable Environmental Changes Which Would Be Involved in the Proposed Action Should it be Implemented

The most apparent irreversible environmental change associated with development of Pacific Highlands Ranch would be the planned commitment of a major portion of the site to residential, educational, recreational, and open space uses. This conversion of land for these uses is a permanent change. Implementation of the precise plan would result in other permanent changes which have been recognized in this MEIR. These include significant changes to existing landform, land use, noise, and archaeological and biological resources. The existing landform would be altered by grading operations that include cutting the mesa top areas and filling canyon heads to provide development areas. These alterations in the existing landform would be irreversible, and since they are a result of the project land use changes, cannot be avoided without changing the development concept guiding either of the proposed plans for Pacific Highlands Ranch.

Approximately 175 acres of the 2,652-acre subarea include existing or approved development projects. The remaining 2,477 acres currently support agricultural, nursery, equestrian, and biological habitat uses. These uses would be changed with implementation of either of the proposed subarea plans, whereby the site would be used for residential, educational, recreational, and open space uses. These changes in the land use of the site would be irreversible. The proposed uses for each plan are detailed below:

1) Subarea Plan I (SR-56 Alignment "F")

Under this proposed subarea plan, approximately 175 acres (existing or planned development) of the 2,652-acre project site would remain unchanged. The remaining 2,477 acres would be irreversibly altered by implementation of Subarea Plan I.

Approximately ~~4,197~~-1,211 acres of the subarea land area would be affected by the residential, school, community park, and street development, and approximately 1,266~~80~~ acres would be preserved as MHPA open space. The commitment of land to these uses would result in the significant irreversible impacts to on-site biological resources, the permanent conversion of agricultural lands to other uses, and with implementation of the subarea plan an irreversible consumption of energy derived from nonrenewable sources, such as fossil fuel and nuclear fuels. Building materials would be considered permanently used.

2) Subarea Plan 2 (SR-56 Alignment “D”)

In terms of irreversible changes to the project site, Subarea Plan 2 is very similar to Subarea Plan 1. Approximately ~~4,179~~-1,211 acres would be converted to residential, school, community park, and street development uses and approximately 1,266~~98~~ acres would be preserved as MHPA open space. The existing 175 acres currently dedicated to existing or planned development would not be affected by the proposed plan. The commitment of land to these uses would result in the significant irreversible impacts to biological resources, agricultural lands, and an irreversible consumption of energy derived from nonrenewable sources. Building materials required for implementation of this subarea plan would be similar to those consumed under Subarea Plan I and would be considered permanently used.

B. Relationship between Local Short-term Uses of the Environment and the Maintenance and Enhancement of Long-term Productivity

The majority of the 2,652-acre Pacific Highlands Ranch site is currently being used for agricultural, equestrian, and nursery purposes. In addition, scattered large-lot single-family homes associated with the agricultural/nursery operations, an approved borrow area, trailers used as nursery/agricultural worker housing, a pet housing facility, and a 29-unit single-family residential development known as Rancho Glens Estates along Caminito Mendiola exist on-site. Undisturbed portions of the site include Diegan coastal sage scrub, southern maritime chaparral, grasslands, eucalyptus woodlands, coyote bush scrub, southern mixed chaparral, scrub oak chaparral, and riparian communities (southern sycamore riparian woodland, mule fat scrub, southern willow scrub, and southern riparian scrub). These habitats provide forage and breeding grounds for a variety of small and large animals. Both the disturbed and undisturbed areas of the site provide a rural, open space character to the site which serves as an important visual resource. In addition, the site contains an estimated 1,300 acres of agricultural land with 500-600 acres farmed in

rotation, and approximately 116 acres of designated MRZ-2 zone lands in the southeast corner of the subarea. Most of the remaining subarea has the potential to provide significant mineral deposits (MRZ-3). A total of 50 prehistoric sites have been recorded with the South Coastal Information Center (SCIC) within Pacific Highlands Ranch.

Adoption of either of the proposed subarea plans would commit the subarea over the long-term for the construction of single-family residential units, commercial and office developments, schools, public parks, other public uses, and roads over about 1,200 acres of the subarea. These developments would result in an increase in the long-term economic productivity of the subarea and would improve transportation efficiency and increase housing and recreational opportunities in the area. These proposed developments would also permanently change the visual character of the project site from an open space, rural appearance to a developed appearance with introduced landscaping and manufactured slopes. The existing agricultural soil, mineral deposits, and biological resources which are present in the future development areas of the site would be eliminated by development and would no longer be available over the long term. Potential significant cultural resources within the development area would be mitigated prior to approval of tentative maps for development sites. However, this would result in damage to the cultural sites and they would subsequently be either removed or covered over by development.

Approximately 1,270 ~~300~~ acres of the subarea would be committed over the long term as resource-based Environmental Tier MHPA open space, for the primary purpose of wildlife habitat, with secondary benefits as recreational and visual resources. Establishment of the Environmental Tier/MHPA Reserve would involve both the preservation of existing wildfire habitat and the creation of improvement of wildlife habitat areas. The Pacific Highlands Ranch Environmental Tier/MHPA would support the long-term regional efforts for the establishment of an interconnected system of wildlife habitat areas throughout the County of San Diego. Thus, the proposed project would create a valuable long-term environmental resources. However, the long-term commitment of 1,270 ~~300~~ acres of Pacific Highlands Ranch as resource-based Environmental Tier/MHPA would preclude the use of the prime agricultural soils, important farmlands and mineral resources located with the Tier. Cultural resource sites in the Environmental Tier would be affected by testing and may then be recovered or preserved in place. Establishment of the Environmental Tier/MHPA would be consistent with MSCP goals.

Thus, the net effect on the uses of the environment and long-term loss of opportunities for use of the on-site agricultural and mineral resources, a permanent change in visual character for most of the project site, damage to and removal of some of the on-site cultural resources, and loss of some of the existing on-site open space and biological resources. However, the project would also result in increased economic productivity of the site (increased employment and tax revenues), the improved transportation efficiency

in the area, the increase in available housing and recreational opportunities (parks, bikeways, and equestrian/hiking trails), and the establishment of the Environmental Tier/MHPA open space preserve which would preserve and restore open space and wildlife habitat as part of an interconnected, regional system.

It should be noted that these changes in the use of the environment and the productivity of the subarea would occur gradually over an estimated 20 years. During the first 10 years, many of the existing agricultural, nursery, and equestrian uses would likely remain in operation. In fact, through careful site planning to ensure the long-term compatibility of these uses with adjacent future development in and adjacent to the subarea, many of these existing uses may survive for more than 10 years as non-conforming uses.

The CEQA Guidelines (Section 15126) require that this section of the MEIR address the reasons that the proposed project is believed by the applicants to be justified now rather than reserving an option for future alternatives. Pacific Highlands Ranch and the rest of the NCFUA are surrounded by developed and developing areas. If the Pacific Highlands Ranch plan and associated phase shift are approved, the soonest that new homes would be constructed in the subarea and available of occupancy would be about 2002. By that time it is likely that the remaining undeveloped areas in the city which surround the NCFUA would be nearly built out. Therefore, the timing for the adoption of either of the subarea plans and associated phase shift are considered by the applicant to be appropriate from the standpoint of projected housing need. However, the final determination of whether the proposed phase shift is appropriate at this time will be made by a vote of the people of the City of San Diego, as required by Proposition A of 1985.

C. Effects Found Not to be Significant

1) Risk of Upset

None of the proposed project components would increase the risk of an explosion or release of hazardous substances to the environment due to an accident or upset conditions. There are no land uses proposed on any of the sites which would be expected to store, use, transport, or generate large quantities of hazardous substances. Since there is currently little public vehicular access through the project site, project construction is not expected to result in interference with an emergency response or evacuation plan.

2) Energy

Implementation of the proposed project would not result in substantial demand for or consumption of energy. Future home development would be in compliance with the energy conservation requirements in Title 24 of the California Administrative Code and

would not be high-energy-demand land uses. The proposed Pacific Highlands Ranch plans encourage a pedestrian-oriented design and the use of alternative modes of transportation with facilities for bicycle, transit, and equestrian use. The proposed project would not require the development of a new source of energy.

Chapter Eight

Project Alternatives

The CEQA Guidelines direct that a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project be discussed and the comparative merits of the alternatives evaluated, including the No Project alternative. The discussion should be limited to alternatives that “would avoid or substantially lessen any of the significant effects of the project.” Factors that may influence feasibility include “site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries . . . , and whether the proponent can reasonably acquire, control, or otherwise have access to the alternative site (or the site is already owned by the proponent)” [Section 15126(d)].

In addition to the proposed project, a No Project alternative (required by CEQA), two alternate site designs, three land use concept plans that implement the underlying zone without a phase shift, a land use plan using the SR-56 central alignment, and a RPO alternative are considered. The potential environmental effects of implementing each of these project alternatives are discussed below.

A. Alternatives Considered but Rejected

In May 1993, a draft Subarea III Plan was prepared for the subject property. It provided for the construction of up to 6,500 dwelling units, approximately 400,000 square feet of commercial and office uses; and the associated public facilities and transportation network similar to the proposed project. This plan also included the central alignment for SR-56, as shown in the Framework Plan. A city-wide vote in 1993 rejected the request for a phase shift for the entire NCFUA including Subarea III and the project was ultimately withdrawn from consideration.

B. No Project Alternative

The No Project alternative typically implies no development of the project site. This approach would result in the retention of the property in its present condition (i.e., open

space and agricultural lands). As a result, the impacts relating to biological resources, landform alteration/visual quality, agricultural resources, cultural resources, public facilities and services, air quality, noise, and cumulative contribution to traffic congestion associated with the proposed Plans 1 and 2 for Pacific Highlands Ranch would be eliminated.

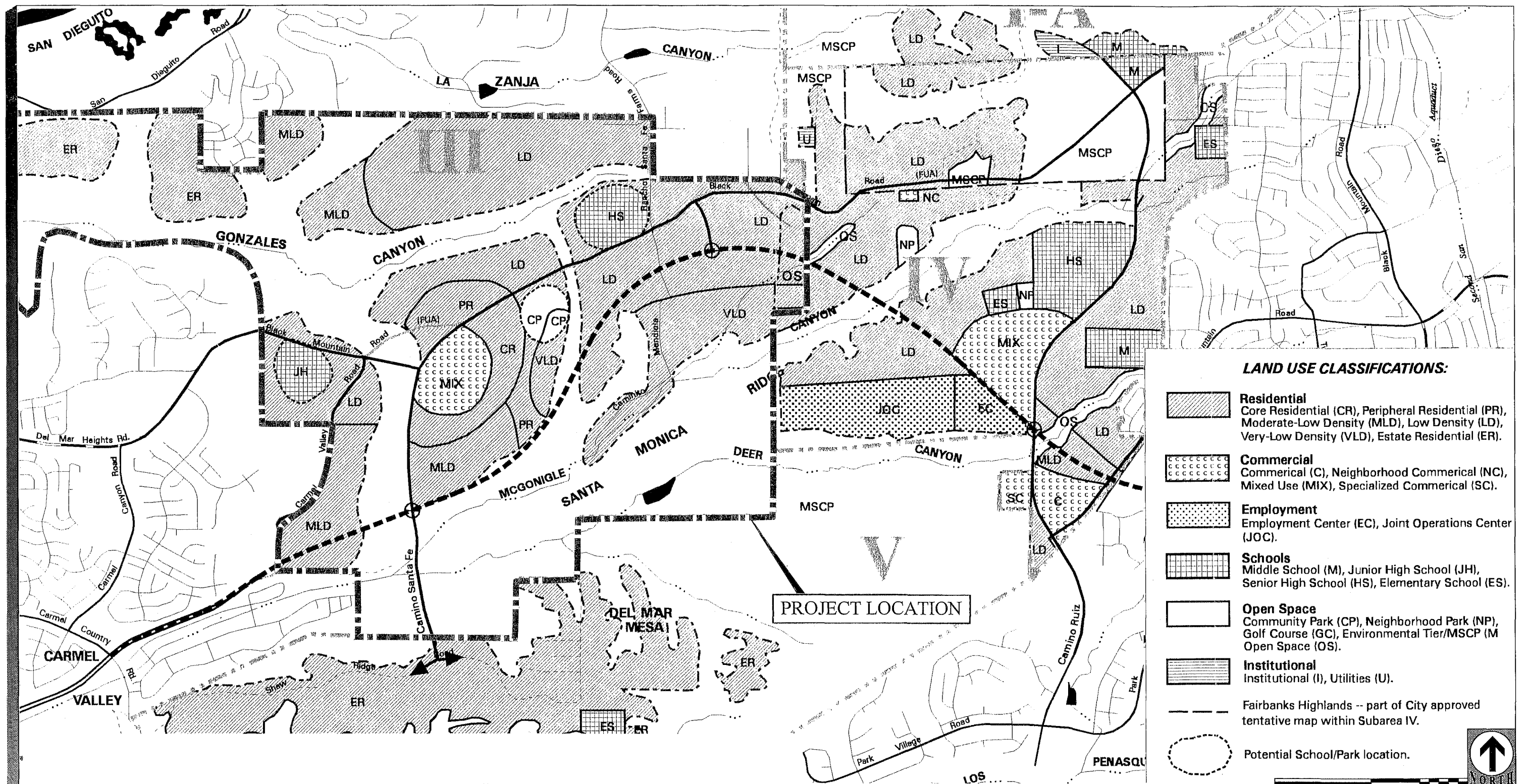
This alternative would not achieve the goals and objectives of the project and the adopted Framework Plan. The Framework Plan objectives of providing housing, facilities benefit assessment fees, and roads would not be achieved. In addition, the permanent contributions provided by the proposed subarea plans to the MSCP preserve would be eliminated.

C. Alternate Site Design - Plan 1

A conceptual alternative site design for Pacific Highlands Ranch Plan 1 (Figure 8-1) has been developed by the City of San Diego which, with the exception of the shown alignment of SR-56, more closely adheres to the land use concept described in the adopted NCFUA Framework Plan (see Figure 4A-1). Table 8-1 provides a comparison of this alternate design plan's land uses with the one proposed by Plan 1. Like the proposed project, this alternative design for Plan 1 includes a similar number of dwelling units, a mixed use core area consisting of commercial uses, community park, various residential densities, and a civic area; a high school, a fire station; and the associated public facilities and transportation network. The site design also includes a junior high school, but does not include an elementary school or neighborhood park. In addition, the alternative design includes moderately low residential densities which are not included in the proposed Plan 1.

Other differences affect the high school which would be shifted away from the MUC to a location further east and north of Carmel Valley Road. The community park and very low-density residential would also be different locations, and an employment center would not be a component of the alternate plan. Residential development would also be extended south of SR-56 near the western boundary which is shown as MHPA open space in the proposed Plan 1. However, as with the proposed Plan 1, the limits of development and grading would cover approximately 50 percent of the subarea. The remaining 50 percent of the site would comprise the MHPA. Table 8-1 details the acreages for the proposed land uses and shows that the MHPA acreage would be increased in size under this alternative.

This alternative would reduce impacts to biological resources. The open space design under this alternative, while similar to Plan 1, would differ from the open space under the proposed plan which reflects the refinements as shown in the MSCP for Subarea III. As noted throughout this EIR, the MHPA as defined by the MSCP Subarea Plan has superseded the Framework Plan Environmental Tier. Thus, the additional open space



Source: City of San Diego 1998

- Centerline of Proposed SR 56
- Proposed Roads under this Land Use Plan
- Existing Roads to be Realigned
- Subarea Boundaries
- MSCP Boundary
- Proposed Interchange Location
- Subareas

FIGURE 8-1

Alternate Design -
Plan 1

REVISED
TABLE 8-1
ALTERNATE DESIGN LAND USE PLANS
(acres)

Land Use	Alternate Design Plan 1	Proposed Subarea Plan 1	Alternate Design Plan 2	Proposed Subarea Plan 2
Residential				
Estate	172	0	172	0
Very Low Density	125	12	97	12
Low Density	442	544	369	535
Peripheral	48	143	156	147
Core	55	60	39	55
Commercial & Employment Center				
Local Mixed Use	0	0	0	0
Mixed Use Core	45	33	39	33
Service/Commercial	0	0	8	0
Employment	0	20	29	17
Other				
Comm/Neigh. Park	35	24	35	31
Schools	80	152	80	153
Open Space	1,243	1268	1,279	1266
Fire Station	3	3	3	3
Streets/Utilities ROW	146	213	145	215
TOTAL	2,394	2,475	2,451	2,472

*Acres of land use shown in the Framework Plan do not separate freeway from other uses.

ROW = right of way

shown in the alternate plan associated with the northern linkage to La Zanja Canyon in the northwest corner of Pacific Highlands Ranch and the retention of eastern on-site portions of Gonzales Canyon differ from the proposed Subarea Plan. This additional open space would accordingly reduce the impacts to native habitats associated with the proposed Plan 1.

From a circulation standpoint, the major circulation element roads would continue to consist of Carmel Valley Road, Del Mar Heights Road, Camino Santa Fe, and SR-56 freeway corridor ("F" Alignment). The circulation pattern would be similar to the proposed Plan 1, but Camino Santa Fe south of SR-56 would follow a more north-south route through the MHPA. Likewise, Carmel Valley Road, just north of SR-56, would connect to Del Mar Heights Road in a north-south manner. The traffic generation under this alternative would be similar to the proposed Plan 1, and traffic circulation impacts would not substantially differ from the proposed project. This alternative would not create a significant direct traffic impact on the area's circulation system.

D. Alternate Site Design - Plan 2

A conceptual alternative site design for Pacific Highlands Ranch Plan 2 (Figure 8-2) has also been developed by the City of San Diego reflecting SR-56 Alignment "D." Like the proposed project, this alternative design for Plan 2 includes a similar number of dwelling units, a mixed use core area consisting of commercial uses, community park, high-density residential, and a civic area; an employment center; a high school, a fire station; and the associated public facilities and transportation network. The alternate site design also includes a junior high school, but does not include an elementary school or neighborhood park. In addition, the alternative design includes moderately low residential densities which are not included in the proposed Plan 2.

Other differences between the proposed Plan 2 and the alternate site design prepared by the City include the shifting of the high school away from the MUC to a location further east and north of Carmel Valley Road. The MUC would be bisected by Camino Santa Fe under this design, and the acreage shown for employment center and specialized commercial uses would be substantially increased along the north side of the SR-56 corridor. The limits of development and grading would cover approximately 50 percent of the subarea. The remaining 50 percent of the site would comprise the MHPA. Table 8-1 details the acreages for the proposed land uses and shows that the MHPA acreage would be increased in size under this alternative.

The differences in environmental impacts between these plans are minimal and the significance of project-related impacts would not be substantially affected. However, the open space design under this alternative, while similar to Plan 2, would differ from the open space under the proposed plan which reflects the refinements as shown in the MSCP

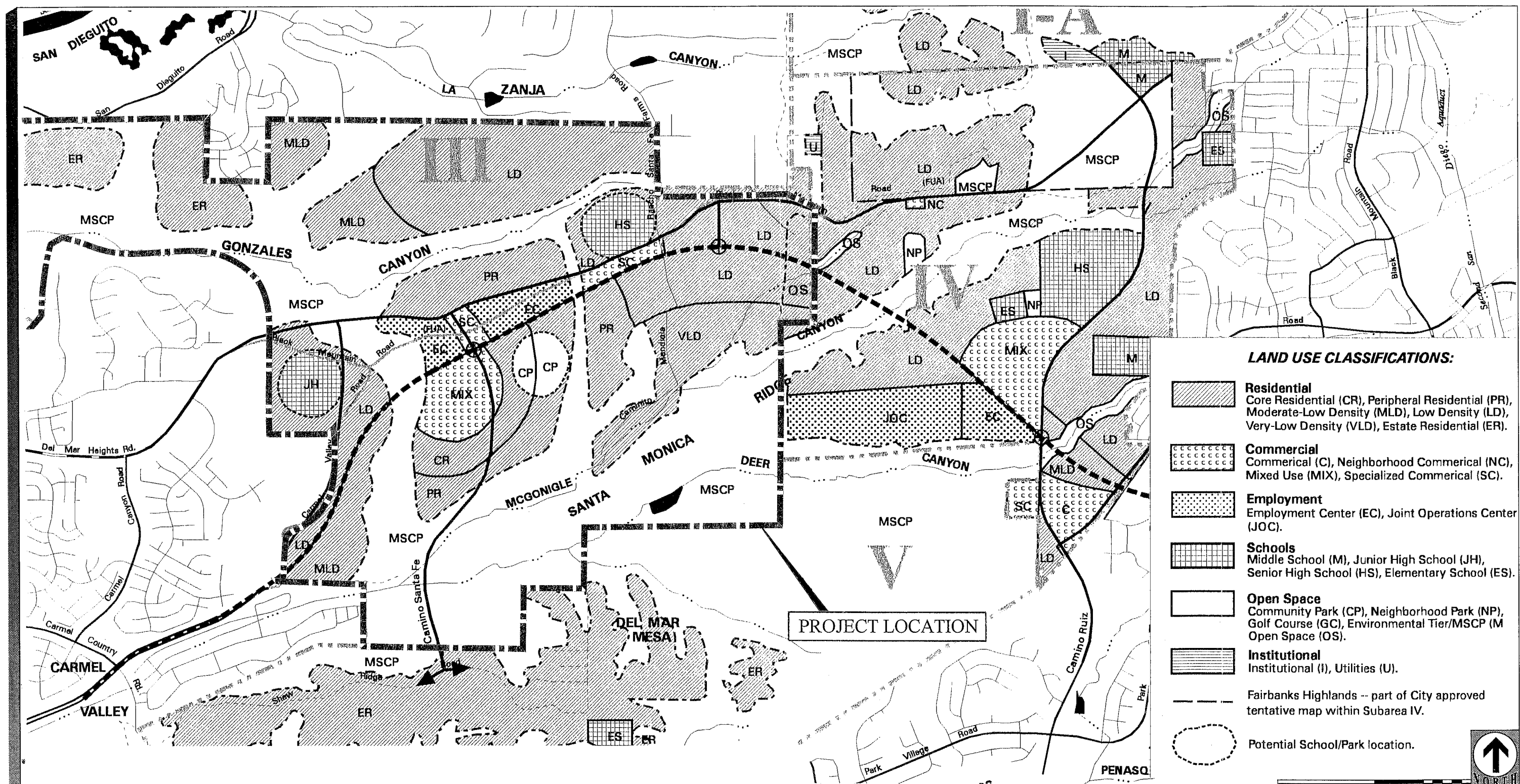


FIGURE 8-2

Alternate Design -
Plan 2

for Subarea III. As noted throughout this EIR, the MHPA as defined by the MSCP Subarea Plan has superseded the Framework Plan Environmental Tier. Thus, the additional open space shown in the alternative plan associated with the northern linkage to La Zanja Canyon in the northwest corner of Pacific Highlands Ranch and the retention of eastern on-site portions of Gonzales Canyon differ from the proposed Subarea Plan. This additional open space would accordingly reduce the impacts to native habitats associated with the proposed Plan 1. This alternative would reduce impacts to biological resources.

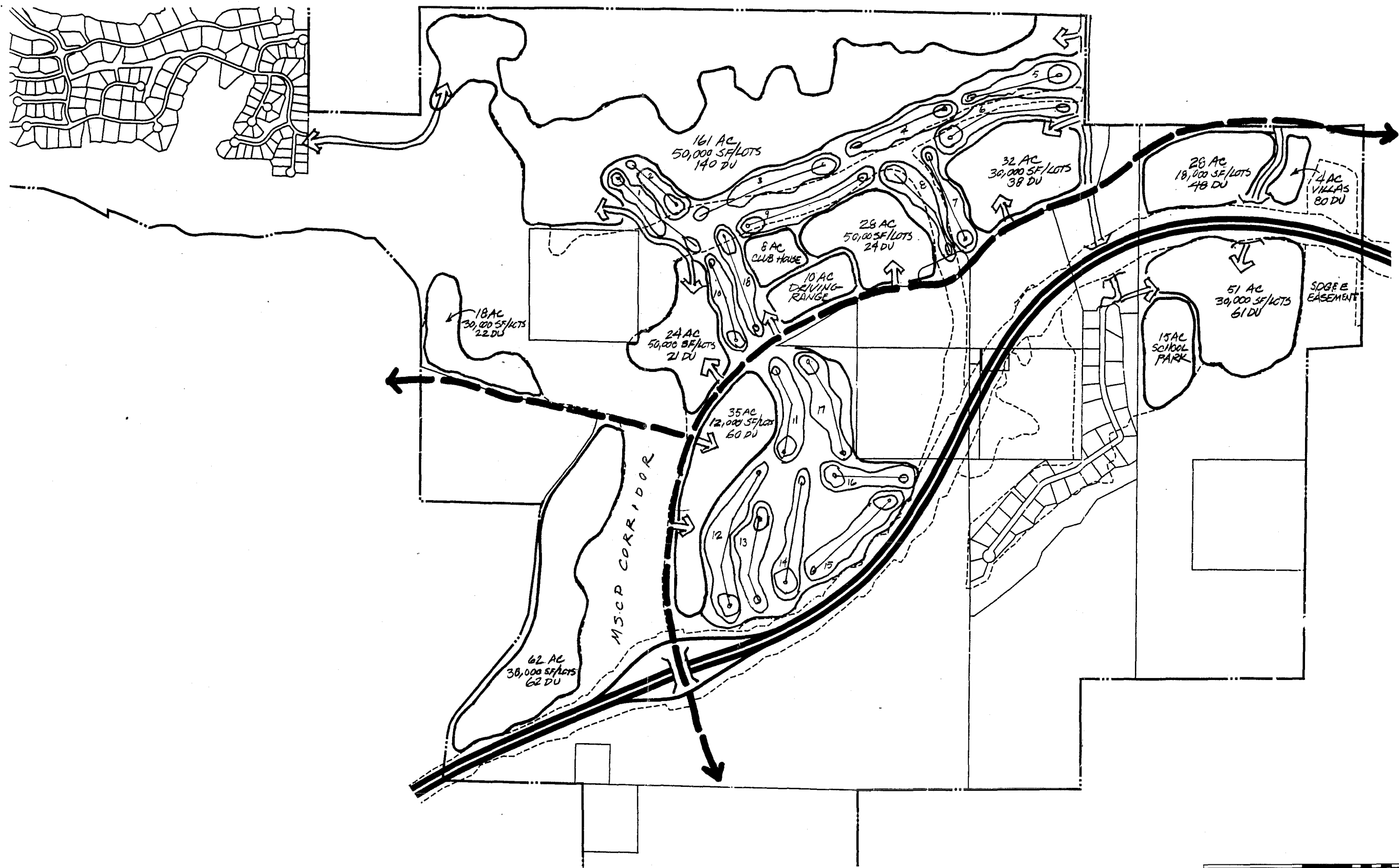
From a circulation standpoint, the major circulation element roads would continue to consist of Carmel Valley Road, Del Mar Heights Road, Camino Santa Fe, and SR-56 freeway corridor ("D" Alignment). However, the alignment of these roadways are less curvilinear north of SR-56 (i.e., Del Mar Heights Road). The traffic generation under this alternative would be similar to the proposed Plan 2. The proposed project would not create a significant direct traffic impact on the area's circulation system.

E. Development without a Phase Shift

The project site could also be developed pursuant to the underlying A-1-10 zoning without a phase shift from Future Urbanizing to Planned Urbanizing. One scenario which could be applied to the project site under the Framework Plan pursuant to Council Policy 600-29 and the Planned Residential Development regulations is development at one dwelling unit per four acres.

A concept plan of a one dwelling unit per four acres with a PRD has been prepared for the Pardee ownership within Pacific Highlands Ranch using three of the SR-56 Alignments: (1) Plan 1 Alignment "F"; (2) Plan 2 Alignment "D"; and (3) the central alignment. Each concept plan is shown in Figures 8-3, 8-4, and 8-5, respectively.

For each of these concepts, this alternative would result in approximately 568 dwelling units, a golf course, driving range, clubhouse, and school park. The total development envelope for the Pardee ownership would occur on approximately 689 acres of the total 1,665-acre Pardee ownership. The residential units would include 416 market rate units on lot sizes varying from 18,000 square feet to 50,000 square feet and 83 affordable housing units at a density of 20 units per acre. The remaining 855 Pardee acres would remain undeveloped, and as stated in Council Policy 600-29, no future development rights would remain with the property. Each of the other ownerships within Pacific Highlands Ranch (approximately 517 acres) could be developed pursuant to the underlying A-1-10 zoning (one dwelling unit per 10 acres) resulting in approximately 52 additional units for a total of approximately 551 units.



Source: Latitude 33 Planning and Engineering 1998

2100 1050 FEET 0

FIGURE 8-3
Non-phase Alternative
(Alignment "F")

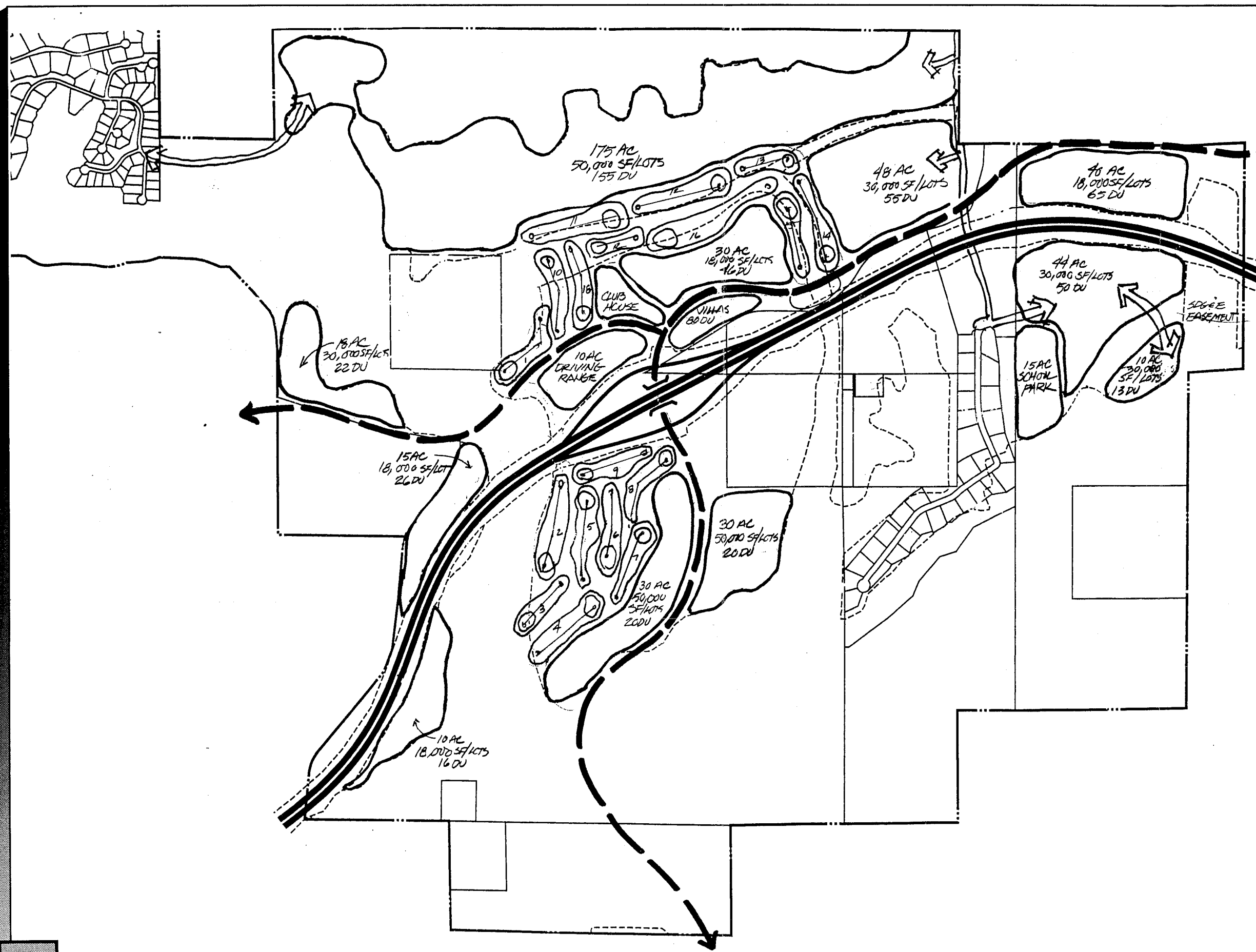


FIGURE 8-4

SR-56 Alignment "D"
Non-phase Shift-
Land Use Plan

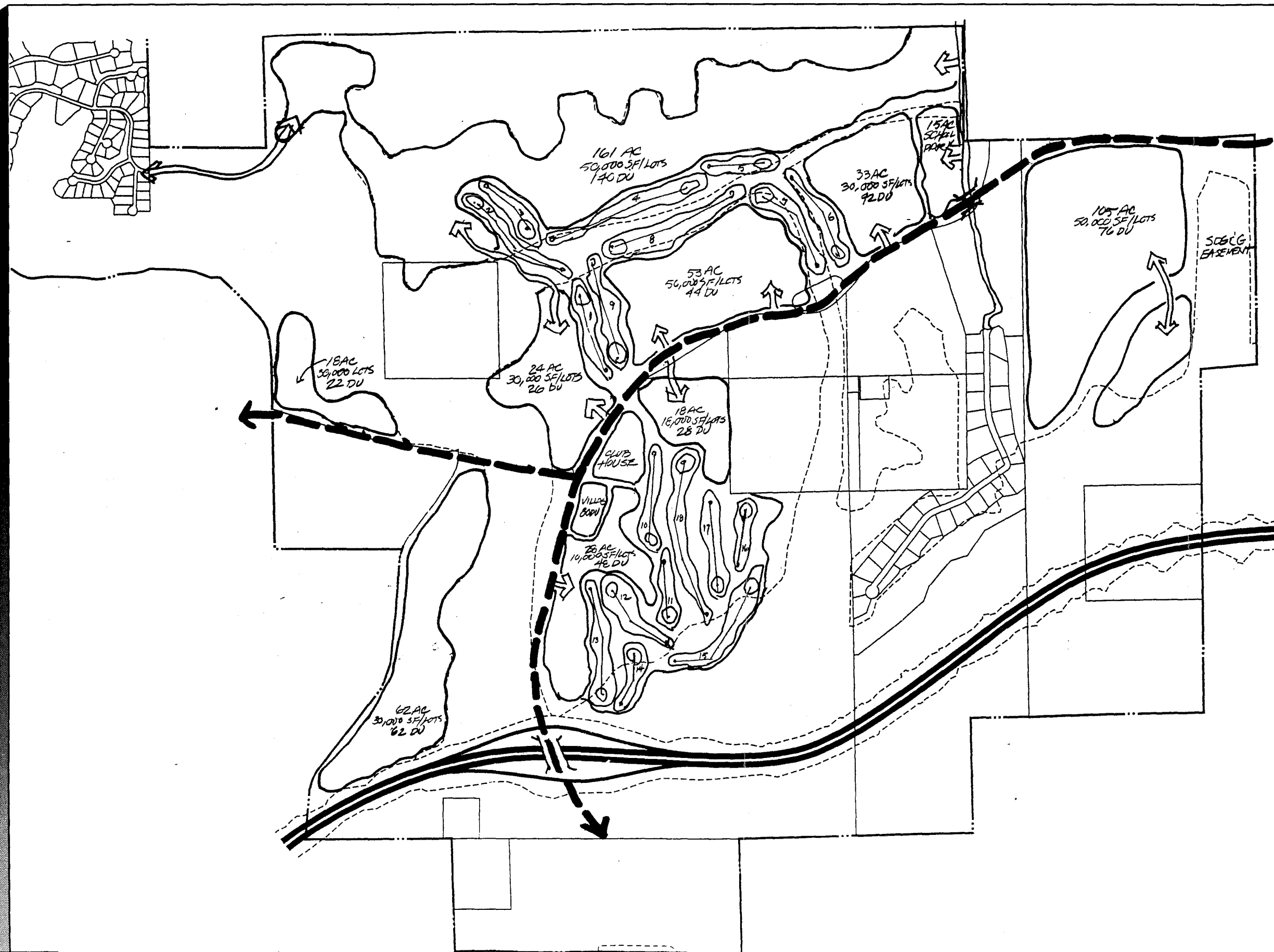


FIGURE 8-5

SR-56 Central
Non-phase Shift-
Land Use Plan

2250 1125 FEET 0



Each of these alternatives could lessen the significant impacts associated with the two proposed Subarea Plans for Pacific Highlands Ranch. Landform alteration would be substantially reduced with the implementation of this alternative as grading for a golf course in the central portion of the site would be reduced from that necessary for the mixed use core, high school, employment center, and various residential densities. The golf course would also be designed to accommodate the urban amenity. Biologically, the MSCP open space corridor in the northwestern corner of the site would be expanded under this scenario with the elimination of the low-density development area. However, without a phase shift, the MHPA open space as shown in the proposed Subarea Plans 1 and 2 would not be permanently preserved due to the development potential of the remaining A-1-10 ownerships throughout the subarea.

These alternatives would reduce the traffic generation from approximately 55,000-71,010 ADT to approximately 6,660 ADT and the demand on public services and utilities (e.g., police, fire, sewer, water, and schools) would be substantially lessened. Other mitigated impacts of the proposed project, such as impacts to hydrology, cultural resources, geology, paleontology, air quality, noise, and public safety, would be further reduced by implementation of this alternative.

However, development of Pacific Highlands Ranch without a phase shift would have potentially significant land use impacts regarding inconsistencies with the adopted NCFUA Framework Plan. This alternative would not provide the community facilities required in the Framework Plan such as the mixed use core, park and school facilities, and employment center. Also, as noted above, the long-term MSCP preserve regional conservation benefits would not be realized under this alternative.

The major difference among these concept plans is the location of the SR-56 alignment and the grading associated with the alignment. The non-phase shift land use concepts associated with each alignment are briefly summarized below.

1) Non-Phase Shift Plan 1 (SR-56 Alignment "F")

As shown on Figure 8-3, this alignment would extend northeast for approximately 2,000 feet to the Carmel Valley Road culvert, then east for approximately 5,000 feet along the north side of McGonigle Canyon, and then northeast for approximately 6,000 feet within a small canyon that parallels the west side of the existing Rancho Glens Estates subdivision. The future Camino Santa Fe interchange would be located approximately 2,000 feet east of Carmel Valley Road and 1,000 feet north of the confluence of McGonigle and Deer Canyons. A possible second interchange within Subarea III (the third within the proposed middle section of SR-56) could be constructed east if the Rancho Santa Fe Farms Road overcrossing. The total length of this alignment would be 5.6 linear miles.

Plan 1 would locate all but 65 acres of development north of the freeway alignment. A few 30,000-square-foot lots would be located adjacent to the freeway alignment in the western and eastern portion of the site which would require noise attenuation barriers (ranging from 10 to 16 feet in height). By locating the golf course just north of the freeway alignment, noise impacts to the senior high school, community park, and core residential development are eliminated.

2) Non-Phase Shift Plan 2 (SR-56 Alignment “D”)

As shown on Figure 8-4, this alignment would extend northeast for approximately 2,000 feet to the Carmel Valley Road culvert, then north for approximately 5,000 feet along the east side of Carmel Valley Road, and then northeast for approximately 6,000 feet along a ridge that parallels the south side of Black Mountain Road. The future Camino Santa Fe interchange would be located approximately 2,000 feet east of the existing Carmel Valley Road/Black Mountain Road intersection. The additional interchange and total length of the alignment would be about the same as under Concept Plan 1.

Concept Plan 2 would locate the freeway alignment in the middle of the development essentially dividing the community. With this concept plan as with the proposed Subarea Plan 2, the freeway location results in impacts to more land uses. Preliminary engineering studies estimate cut-and-fill volumes of about 2.5 million cubic yards. Noise attenuation barriers (ranging from 8 to 16 feet in height) would be required on both sides of the freeway and retaining walls would be constructed in the eastern portion of the alignment on the south side.

3) Non-Phase Shift Plan 3 (SR-56 Central Alignment)

As shown on Figure 8-5, this alignment would begin at the southwest corner of Pacific Highlands Ranch as do the other alternative alignments, but instead of traversing northerly up toward the crest of the canyon, this alignment continues easterly in McGonigle Canyon. Near the intersection of McGonigle and Deer Canyons, the freeway would proceed in a northeast direction along the south-facing slope of Santa Monica Ridge. The freeway leaves Pacific Highlands Ranch in the southeast section adjacent to the Torrey Highlands community (Subarea IV).

Since the central alignment would be separated from the community by open space, there would be a reduction in noise impacts for residential units, schools, and parks, in addition to an incremental reduction in air quality impacts related to freeway traffic (fewer vehicle miles traveled).

F. SR-56 Central Alignment Alternative

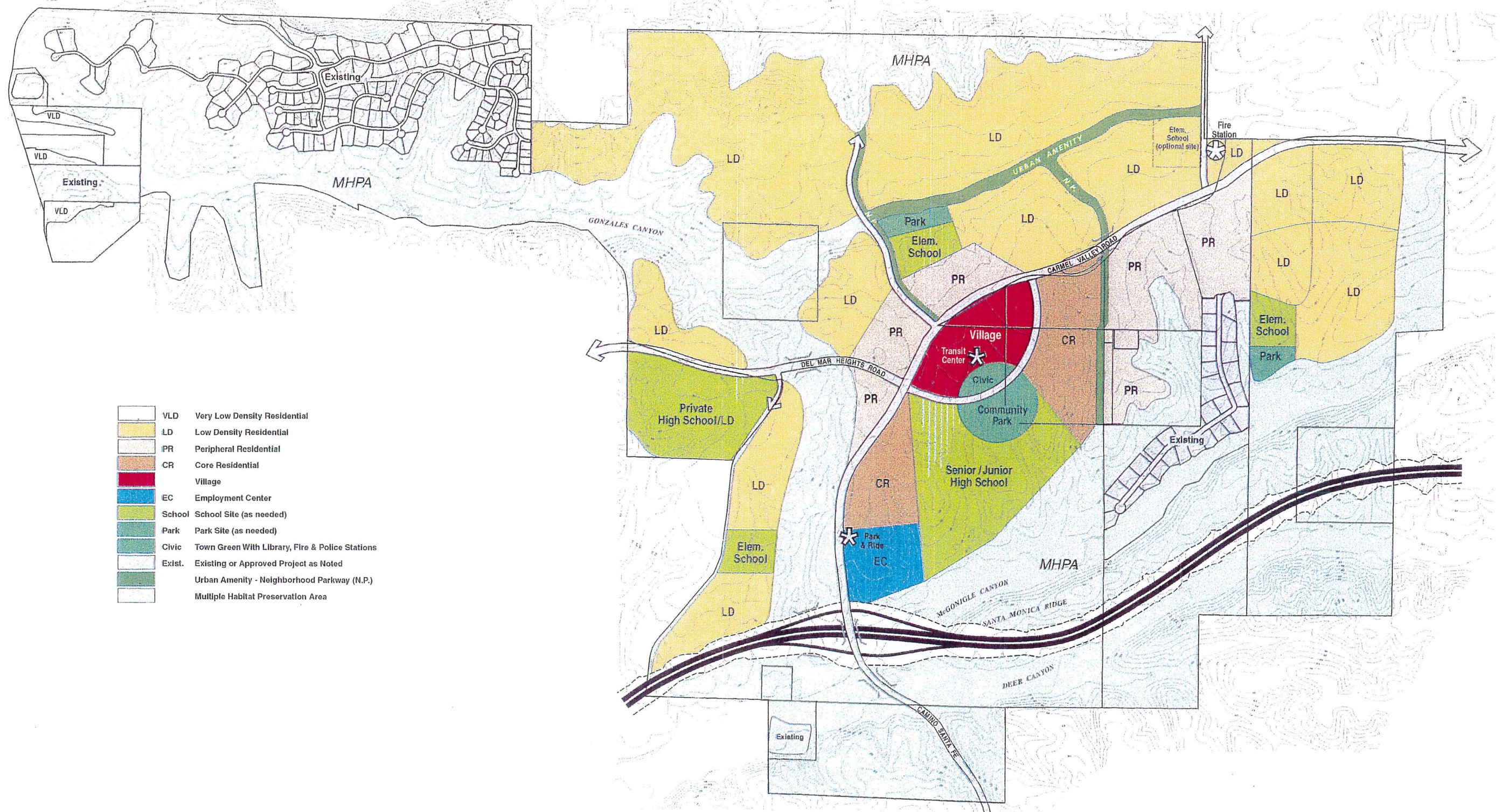
This alternative plan to the two proposed subarea plans is included to address the possible adoption of the central alignment for SR-56. The SR-56 central alignment is the most direct route between the western portion of Carmel Valley and the eastern portion of Rancho Peñasquitos.

This alignment would enter Pacific Highlands Ranch in the southwest corner of the planning area as shown in Figure 8-6. Topographically, this places the freeway in McGonigle Canyon and adjacent to Carmel Creek. However, while the alignment begins at the southwest corner of Pacific Highlands Ranch as do the other alternative alignments, instead of traversing northerly up toward the crest of the canyon, this alignment continues easterly. Near the intersection of McGonigle and Deer Canyons, the freeway would proceed in a northeast direction along the south-facing slope of Santa Monica Ridge within Deer Canyon. The freeway leaves Pacific Highlands Ranch in the southeast section adjacent to the Torrey Highlands community (Subarea IV).

As shown in Figure 8-6, the land use plan for the central alignment alternative is similar to the proposed Subarea Plan 1 with the "F" alignment for SR-56. This alternative would include up to 5,500 residential dwelling units; a Town Center and Village area consisting of commercial uses, retail uses, a community green, high-density residential, and a civic area; an employment center; three elementary schools; two neighborhood parks; a community park; one junior high and two high schools (one private and one public); a public library; a fire station; a police substation; and the associated public facilities and transportation network. The limits of development and grading for the land use plan area only would cover approximately 50 percent of the 2,652-acre subarea. Additional disturbance would be required to construct the freeway south of the developed area.

Comparison of Impacts with the Proposed Subarea Plans 1 and 2

Because the proposed number of dwelling units and types of land uses for this alternative are very similar to those proposed in either Subarea Plan 1 or 2, potential impacts related to the size of the development envelope and numbers of vehicle trips generated are similar. The main difference between this alternative and the two proposed Subarea Plans is the location of the SR-56 alignment. In this alternative the alignment would be located in a sensitive portion of the adopted MHPA but would be separated from the community by open space. Following is a discussion of those environmental issues most affected by the location of the SR-56 alignment. All other potential environmental impacts are considered essentially similar to either of the proposed Subarea Plans.



Map Source: Latitude 33 Planing and Engineering 1998

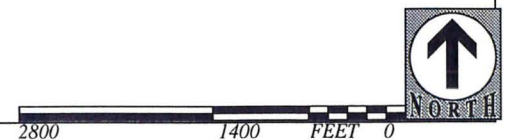


FIGURE 8-6
Central SR56 Alignment Alternative
Land Use Plan

a) Land Use

In both proposed plans, the freeway would divide the community and the adjacent residential, school, and park uses would experience increased noise and air quality impacts associated with the freeway. Since the central alignment would be separated from the community by open space, there would be a reduction in noise impacts for residential units, schools, and parks, in addition to an incremental reduction in air quality impacts related to freeway traffic (fewer vehicle miles traveled).

b) Transportation/Traffic Circulation

Like all of the other alignments, this alternative alignment would accommodate projected interregional traffic and would complete a major planned circulation element in the region. While vastly improving regional mobility, there would still be traffic impacts associated with the general growth of the area, not the construction of the freeway. From a traffic perspective this alignment is not very different from either of the Subarea Plan 1 or 2 proposed alignments. Also, the final configuration to have one or two interchanges in Subarea III has little effect on traffic impacts.

c) Biological Resources

As described in the SR-56 EIR (City of San Diego 1998), adoption of the central alignment would result in significant impacts to biological resources. This alignment would impact a larger portion of sensitive habitat than the other proposed SR-56 alignments because of its location on relatively undisturbed slopes of Deer Canyon. Also, this route would fragment a large portion of the MHPA into 500- and 700-acre portions, compromising the biological integrity of the MHPA. This fragmentation would be a significant unmitigated impact. In addition, this alignment would be a barrier to major wildlife corridors which traverse McGonigle and Deer Canyons. Bridge crossings would be constructed to allow continued wildlife movement.

The central alignment would impact additional areas of sensitive habitat and plants including Diegan coastal sage scrub, scrub oak, chaparral, scrub oak chaparral, southern mixed chaparral, chamise chaparral, non-native grasslands, wetlands, San Diego barrel cactus, and Nuttall's scrub oak. This route would also disturb stands of California adolphia and summer holly. Grading for the alignment would disturb California gnatcatcher territories. Impacts to the above sensitive habitats and species could be mitigated; however, the fragmentation of the MHPA would be a significant and unmitigated impact (City of San Diego 1998). These impacts would not occur under the proposed subarea plans.

d) Landform Alteration/Visual Quality

Like the proposed Subarea Plans 1 and 2, grading for this alternative would impact a minor area of steep slopes, exceed the City's threshold of 2,000 cubic yards of earthwork per acre; and create manufactured slopes greater than 10 feet high. However, this alternative would result in a freeway alignment with more significant contrast to landform than either of the other subarea plans because of the 80-foot-high cut slope face on the highly visible Santa Monica Ridge. This alternative would also introduce an urban feature into a relatively undisturbed canyon environment, albeit with few sensitive viewers. Thus, the visual contrast between this alignment and surrounding environment would be substantially increased from the other alignments under Plans 1 and 2. However, because noise impacts to sensitive receivers would be almost entirely avoided under this alignment, the visual impact associated with the noise walls necessary under Plans 1 and 2 would be reduced under the central alignment.

e) Cultural and Paleontological Resources

It is assumed that the proposed development envelope for the SR-56 central alignment alternative would impact about the same number of significant cultural resource sites as would either the Subarea Plan 1 or 2. However, according to the City draft EIR, the SR-56 central alignment would impact only one sensitive cultural resource site while the Alternative "D" alignment would affect six sites and the Alternative "F" alignment would affect five sites (City of San Diego 1998). According to the same EIR, the central alignment would impact about 25 fewer acres of geologic formations with some paleontological sensitivity. All of the alternatives may be adequately mitigated for significant cultural resources or paleontological impacts with implementation of a CEQA-approved data recovery program.

G. Resource Protection Ordinance Alternative

The identified land use impact associated with the proposed project's inconsistency with the provisions of RPO would be lessened by a project alternative which strictly complies with the encroachment provisions of RPO. Under this scenario, a project alternative that avoids wetland encroachment and floodways, applies wetland buffers adjacent to all wetlands, reduces the excess steep slope encroachment, and avoids impacts to RPO-significant archaeology sites would reduce the identified land use impact (see Land Use, Chapter 4.A, Issue 2). Aside from the land use implications associated with the Framework Plan goals, this alternative would also lessen the other direct and cumulative impacts associated with the proposed Subarea Plans. It is considered environmentally preferable to the proposed projects.

A conceptual alternative land use plan which incorporates these design revisions is shown in Figure 8-7. Under this conceptual scenario, the number of single-family units would be reduced by approximately 50 percent as the total on-site development area for residential development and the associated transportation network would be substantially reduced.

Other impacts associated with the proposed subarea plans would also be reduced under the RPO alternative. Impacts to native vegetation and landform alteration/visual quality would be reduced under this alternative. However, substantial earthwork would still be required for the grading for the development areas and the SR-56 alignment, and the impacts would remain significant and unmitigated. With the reduction in dwelling units, the project traffic generation would be reduced from 80,000 ADT to approximately 40,000 ADT. Finally, the demand on public services (schools, parks, police and fire service) and utilities (water, sewer, and solid waste) would be lessened under this alternative.

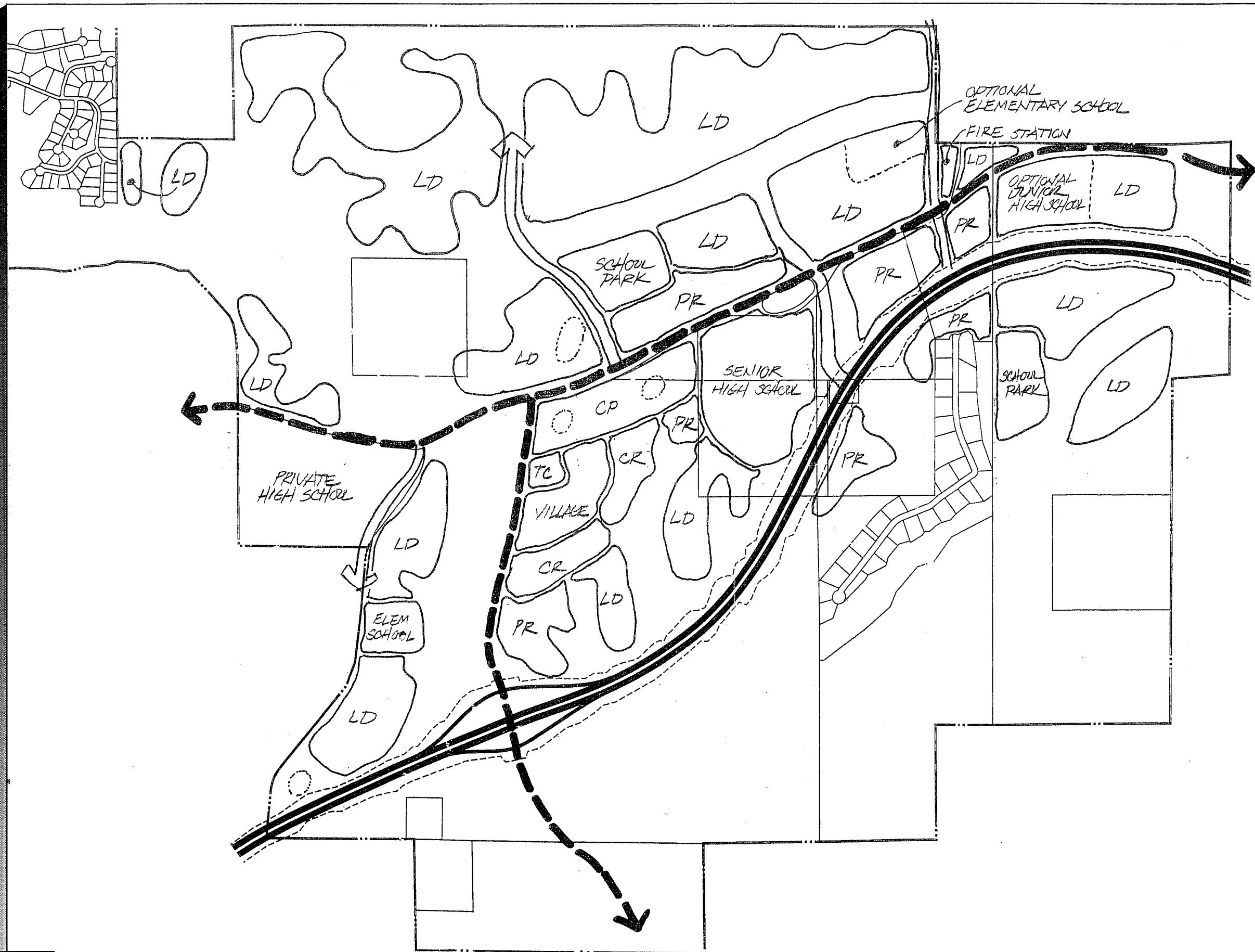
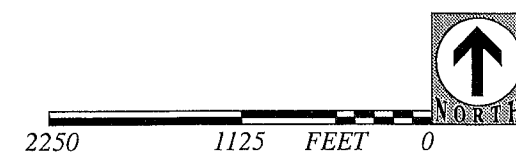


FIGURE 8-7
Conceptual
RPO Alternative
Land Use Plan

Map Source: Latitude 33 Planning and Engineering 1998



Chapter Nine

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Chapter Eleven

Certification

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Mitigation Monitoring and Reporting Program Pacific Highlands Ranch Subarea Plan LDR No. 96-7918

The California Environmental Quality Act (CEQA), Section 21081.6, requires that a mitigation monitoring and reporting program be adopted upon certification of an environmental impact report (EIR) in order to ensure that the mitigation measures are implemented. The mitigation monitoring and reporting program specifies what the mitigation is, the entity responsible for monitoring the program, and when in the process it should be accomplished.

The mitigation monitoring and reporting program for Pacific Highlands Ranch Subarea III is under the jurisdiction of the City of San Diego and other agencies as specified below. The following is a description of the mitigation monitoring and reporting program to be completed for the project. Tables and figures from the MEIR for the project are referenced in the following text.

1) Land Use

a) **Impact: Subarea Plans 1 and 2.** Both proposed plans are generally consistent with the intent of the General Plan, environmental goals of the adopted NCFUA Framework Plan, Council Policy 600-40, and the North City LCP. The lack of compliance with the preservation of agricultural lands described in the Framework Plan, and the impacts to the circulation system represents a significant direct and cumulative land use impact.

a) **Mitigation: Subarea Plans 1 and 2.** The No Project alternative would avoid impacts to the General Plan agricultural lands preservation goal, and the NCFUA circulation system principles.

b) **Impact: Subarea Plans 1 and 2.** Both subarea plans have been prepared consistent with the requirements of City Council Policy 600-40. However, both plans would not be consistent with the encroachment provision of RPO as they apply to steep slopes, wetlands, and significant prehistoric sites. As such, this would represent a significant direct and cumulative land use impact.

b) **Mitigation: Subarea Plans 1 and 2.** Although both subarea plans have been designed to minimize impacts to RPO-sensitive resources, strict compliance with the development regulations of the ordinance would require a project redesign. The plans' inconsistency with the RPO encroachment provisions can be avoided with

implementation of the No Project alternative and mitigated to below a level of significance by adoption of a RPO alternative. These alternatives are discussed in Chapter 8 of this EIR.

Land Use Compatibility within Pacific Highlands Ranch

c) **Impact: *Subarea Plans 1 and 2***. The identified potential internal land use compatibility impacts described above in conjunction with the SR-56 alignment are considered potentially significant. As noted above, the significance of this impact is also described in the Revised Draft EIR for the Middle Segment of SR-56. Also, the proposed extension of Carmel Valley Road could result in significant land use incompatibilities with the proposed Pacific Highlands Ranch residential developments along these roadways.

c) **Mitigation: *Subarea Plans 1 and 2***. Mitigation for the potential internal land use compatibility impacts associated with proposed land uses and the SR-56 freeway would consist of the requirement for landscaping and noise attenuation measures at the time tentative maps are processed.

2) Transportation/Traffic Circulation

a) **Impact:** The following impacts are considered both direct and cumulatively significant:

- Development of 41 Phase I units east of the existing Del Mar Heights Estates.
- Project contribution of more than 2 percent traffic to Black Mountain Road/Park Village intersection.
- Additional traffic contribution to Black Mountain Road from SR-56 to Mercy Road (currently failing).
- Project contribution of more than 2 percent traffic to El Camino Real between Via de la Valle and Half Mile Drive (LOS F).
- Project contribution of 7.5 percent traffic to Camino Ruiz North or SR-56 at buildout without the third intersection (LOS E).
- Project contributions to freeway areas where wait already exceeds 15 minutes.
- Project contribution of more than 2 percent traffic to El Apajo from Via Santa Fe to San Dieguito Road.

a) **Mitigation:** Table 4B-14 includes all of the area's transportation improvements necessary to reduce project impacts to the extent feasible; however, not all impacts are reduced to below a significant level. Table 4B-14 includes the location of the

improvement, the type of the improvement, the party responsible for the improvement, and the level of significance after mitigation.

3) Biological Resources

a) Impact:

Subarea Plan 1. The direct, indirect, and cumulative impacts to sensitive biological resources described above are considered significant. The significant impacts include loss of MSCP Tier I (13.2 acres of southern maritime chaparral and 0.6 acre of native grasslands) and Tier II (10.4 acres of coastal sage scrub and 0.1 acre of coyote bush scrub) habitats, direct and cumulative loss of riparian scrub wetland habitats (approximately 0.4 acre), and impacts to the above-identified sensitive plant and animal species.

Subarea Plan 2. The direct, indirect, cumulative impacts to sensitive biological resources described above are considered significant. The significant impacts include loss of MSCP Tier I (12.9 acres of southern maritime chaparral and 0.6 acre of native grasslands) and Tier II (10.0 acres of coastal sage scrub) habitats, direct and cumulative loss of riparian scrub wetland habitats (approximately 0.7 acre), and impacts to the above-identified sensitive plant and animal species.

Both Plans. Although both plans would meet the MSCP requirement, cumulative wetland impacts would remain significant.

Carmel Valley Neighborhood 10 Precise Plan. The impacts to coastal sage scrub and non-grasslands would be a significant impact.

a) **Mitigation:** The significant direct and indirect impacts to upland biological resources would be mitigated to below a level of significance through conformance and implementation of the MSCP. The Pacific Highlands Ranch MSCP impacts and mitigation requirements are shown in Tables 4C-5 and 4C-6. Table 4C-5 shows the mitigation requirements for Plan 1 and Table 4C-6 shows the mitigation requirements for Plan 2. These tables separate the mitigation requirements for the Pardee ownership and the non-Pardee ownerships. The identified mitigation ratios are per the adopted MSCP based on the vegetation type (Tier Designation) being impacted. As these tables indicate, there is adequate acreage on-site to mitigate for Pardee's direct impacts within Pacific Highlands Ranch. There is also adequate acreage within Subarea II to mitigate for the 8.1 acres of impacts into Tier II and Tier III habitats previously designated as open space within Carmel Valley Neighborhood 10 Precise Plan. Other mitigation requirements identified to deal with direct and indirect impacts would be implemented at the time future tentative maps are processed and would include the following:

1. Staking and monitoring of grading activities shall be supervised by a qualified biologist to ensure no unanticipated impacts to sensitive habitats or species occur within the areas shown for permanent open space. This requirement should be noted on the grading plans prior to the issuance of a grading permit.
2. Brush management for Zone 2 shall be implemented as required by the City and shall be the responsibility of the adjacent landowner.
3. Lighting at perimeter lots adjacent to the open space shall be selectively placed, shielded, and directed away from that habitat.
4. Any fencing along property boundaries facing the open space corridors shall be designed and constructed of materials that are compatible with the open space corridors. Fencing shall be installed by the developer prior to the occupancy of the units in order to ensure uniformity. Locations where fencing are required are described in the Subarea Plan.
5. Restrictions for noise impacts on grading of lands adjacent to the MHPA consistent with the MSCP Subarea Plan should be implemented during the gnatcatcher breeding season. Grading inside the MHPA preserve or within 100 feet of the MHPA is prohibited during gnatcatcher breeding season. Grading can occur on land that was previously cleared.

Wetland impacts under both Plan 1 and Plan 2 would be mitigated through the creation/restoration within the Pacific Highland Ranch project site. Portions of the drainage bottoms with Deer Canyon and McGonigle Canyon have been disturbed by agricultural operations and can be utilized to accomplish wetland mitigation requirements on-site. Wetland restoration, at a ratio consistent with the MSCP, is a component in the conceptual revegetation plan prepared in conjunction with the mitigation land bank (see discussion below).

Other mitigation measures provided as extraordinary benefit to the City, negotiated as part of a contemplated development agreement for Subarea III would be the dedication of lands within Subarea V and the Carmel Valley community planning area. At Carmel Valley Neighborhood 8A (Parcels A and B), approximately 75 acres of Tier I habitat would be added to the MHPA. The addition of these lands to the MHPA would greatly increase the size of the habitat block planned for this particular geographic area, improving the overall preserve design and configuration, and providing greater assurances that scarce vegetation types (i.e., southern maritime chaparral) would be maintained over the long term. Additionally, future development potential at the Deer Canyon parcel within Subarea V would be avoided. Finally, Pardee has agreed to other provisions which would further enhance the MHPA function. These measures consist of the following:

1. No brush management activities would be performed within the preserve along the edges of several of the proposed encroachment areas as described in the Subarea Plan. Zone 2 brush management would be allowed in other areas of the MHPA.
2. All manufactured slopes along the edge of the MHPA would be included within the MHPA and would be revegetated in accordance with a Master Revegetation Plan.
3. Impacts to wetlands would be minimized, and mitigation would be per City Ordinance and the U.S. Army Corps of Engineers 404 Permit requirements.
4. Approximately 130 acres of disturbed land within the MHPA for Pacific Highlands Ranch would be restored per a Master Revegetation Plan with appropriate upland and wetland habitats and a mitigation bank established. Much of this revegetation area consists of a manufactured wildlife corridor that would connect and provide for wildlife movement between Gonzales Canyon and McGonigle Canyon.
5. Conveyance of acreage within Carmel Valley Neighborhood 8A and Subarea V (Deer Canyon).

Prior to the issuance of grading permits in conjunction with future tentative map approvals, Development Services shall review the grading and landscape plans for consistency with the mitigation measures for impacts to biological resources (grading and brush management). The above measures would be conditions of future development permits and landscape plans. After completion of grading and prior to the issuance of building permits, a site inspection by City staff would be required to ensure compliance with the brush management mitigation program.

Mitigation Land Banks

In order to effectuate the boundary adjustments to the MHPA, a mitigation bank would be established over approximately 130 acres of land within the Pardee ownership in Pacific Highlands Ranch. The bank will consist of disturbed land that will be revegetated in accordance with the master revegetation plan. Restored habitats will consist of appropriate wetland and upland habitats. It is anticipated that much of the upland habitat would consist of Tier II and Tier III habitats. The City will direct project applicants needing mitigation in the North City area to purchase credits in this bank, and will accept land from this bank into the MHPA upon purchase of credits by a third party. The bank will be processed and approved expeditiously by the City in a manner that will enable establishment costs to be kept to a minimum.

For areas to be restored, a conceptual revegetation summary which outlines the general criteria and maintenance requirements to be included in a more detailed master revegetation plan for Pacific Highlands Ranch is included as Appendix C2 to this EIR.

Restored lands included in the mitigation bank would be maintained as required in the master revegetation plan until credits are sold and the land conveyed to the City for MHPA purposes. Upon conveyance, the City would assume responsibility for management and maintenance.

A mitigation bank covering approximately 24 acres within Parcel A of Carmel Valley Neighborhood 8A would also be established as a component of the MHPA boundary adjustment process.

4) Hydrology

a) Impact: Subarea Plans 1 and 2. Construction activities in Pacific Highlands Ranch could result in significant erosion, siltation, and water quality impacts. The increase in runoff volume and velocity due to the introduction of streets, roads, and other hardscape surfaces could result in significant adverse erosion, water quality, and flooding impacts to existing natural drainage courses and the Carmel Valley storm drain system. However, these impacts are mitigable to below a level of significance by incorporating the City's BMPs and the standard engineering practices listed below.

a) Mitigation: Subarea Plans 1 and 2. Incorporation of the following mitigation measures into project design would mitigate potential hydrology/water quality impacts to a level of less than significant. The exact locations and design of these measures will be determined in conjunction with future specific development proposals. As a condition of future tentative map approvals, the following mitigation measures shall be specified on the grading plan:

Short-term Construction Practices

1. As a condition of future VTMs and to be shown as a note on the grading permit, grading and other surface-disturbing activities either shall be planned to avoid the rainy season (i.e., November through March) to reduce potential erosion impacts or shall employ construction phase erosion control measures, including the short-term use of sandbags, matting, mulch, berms, hay bales, or similar devices along all graded areas to minimize sediment transport. The exact design, location, and schedule of use for such devices shall be conducted pursuant to direction and approval by the City Engineer.
2. Prior to the issuance of a grading permit, the grading plan shall locate temporary desilting basins at all discharge points adjacent to drainage courses or where substantial drainage alteration is proposed. The exact design and location of such facilities shall be conducted pursuant to direction by the City Engineer.

3. As condition of future VTMs, the developer shall within 90 days of completion of grading activities, hydroseed landscape graded and common areas with appropriate ground cover vegetation consistent with the biology section mitigation requirements (e.g., use of native or noninvasive plants). These revegetated areas shall be inspected monthly by a qualified biologist until vegetation has been firmly established as determined by the City's grading inspector.
4. Compacted areas shall be scarified, where appropriate, to induce surface water infiltration and revegetation as directed by the project geologist, engineer, and/or biologist.
5. General Construction Activity Storm Water Permits (NPDES No. CAS000002) shall be obtained from the SWRCB prior to project implementation. Such permits are required for specific (or a series of related) construction activities which exceed five acres in size and include provisions to eliminate or reduce off-site discharges through implementation of a SWPPP. Specific SWPPP provisions include requirements for erosion and sediment control, as well as monitoring requirements both during and after construction. Pollution control measures also require the use of best available technology, best conventional pollutant control technology, and/or best management practices to prevent or reduce pollutant discharge (pursuant to SWRCB definitions and direction).
6. A Dewatering Waste Discharge Permit (NPDES No. CA0108804) shall be obtained for the removal and disposal of groundwater (if necessary) encountered during construction. Such permits are intended to ensure compliance with applicable water quality, and beneficial use objectives, and typically entail the use of BMPs to meet these requirements. Discharge under this permit will require compliance with a number of physical, chemical, and thermal parameters (as applicable), along with pertinent site-specific conditions (pursuant to RWQCB direction).
7. Specified vehicle fueling and maintenance procedures and hazardous materials storage areas shall be designated to preclude the discharge of hazardous materials used during construction (e.g., fuels, lubricants and solvents). Such designations shall include specific measures to preclude spills or contain hazardous materials, including proper handling and disposal techniques and use of temporary impervious liners to prevent soil and water contamination.

Project Design

As conditions of future VTMs and to be included as notes and exhibits on the grading plan, the following mitigation measures would be required:

8. Postconstruction erosion control measures shall be implemented where proposed disturbance is adjacent to or encroaches within existing drainage courses and projected runoff velocities exceed 5 cfs.
9. Final project design shall incorporate all applicable BMPs contained in the City and State *Best Management Practices to be Considered in the Development of Urban Stormwater Management Plan*. Specifically, these may include measures such as the use of detention basins, retention structures, infiltration facilities, permeable pavements, vegetation controls, discharge controls, maintenance (e.g., street sweeping), and erosion controls.
10. Surface drainage shall be designed to collect and discharge runoff into natural stream channels or drainage structures. All project-related drainage structures shall be adequately sized to accommodate a minimum 50-year flood event (or other storm events pursuant to direction from the City).
11. Project operation and maintenance practices shall include a schedule for regular maintenance of all private drainage facilities within common development areas to ensure proper working condition. Public facilities shall be maintained by the City.
12. Surface and subsurface drainage shall be designed to preclude ponding outside of designated areas, as well as flow down slopes or over disturbed areas.
13. Runoff diversion facilities (e.g., inlet pipes and brow ditches) shall be used where appropriate to preclude runoff flow down graded slopes.
14. Energy-dissipating structures (e.g., detention ponds, riprap, or drop structures) shall be used at storm drain outlets, drainage crossings, and/or downstream of all culverts, pipe outlets, and brow ditches to reduce velocity and prevent erosion.
15. Long-term maintenance responsibility of the detention basin may be accepted by the City of San Diego or through other acceptable mechanisms (e.g., homeowners' association or assessment district).

The City Engineer shall verify that the precise plan mitigation measures are conditions for the approval of future proposed VTMs. The measures shall be completed prior to issuance of the Certificate of Occupancy.

b) **Impact: Subarea Plans 1 and 2.** Impacts to the course and flow of floodwaters are mitigable to a level of less than significant through the incorporation of the mitigation measures and BMPs identified previously under Issue 1 (Impact A).

b) **Mitigation: *Subarea Plans 1 and 2.*** Impacts to floodwaters would be mitigated to a level of less than significant by incorporating the mitigation measures and BMPs identified for Issue 1 (Impact A) above. All flood control measures shall be reviewed and approved by the City's Transportation and Drainage Design Division of the Public Works Business Center prior to construction.

c) **Impact: *Subarea Plans 1 and 2.*** The proposed development of Pacific Highlands Ranch has the potential to significantly impact water quality (both directly and cumulatively) in the San Dieguito River and Lagoon, Carmel Valley, and Los Peñasquitos Lagoon. Specifically, such impacts may be associated with short- and long-term erosion and sedimentation and construction-related contaminant discharge. The proposed project's effects would be less adverse overall than those currently resulting from commercial agricultural activities on-site. The runoff of urban-generated pollutants is not considered significant (on a direct basis) due to the presence of existing regulatory controls and the anticipated incremental nature and extent of such pollutants, though the incremental contribution of urban pollutants would be cumulatively significant.

c) **Mitigation: *Subarea Plans 1 and 2.*** Direct impacts to water quality would be mitigated to a level of less than significant by incorporating the mitigation measures identified for Issue 1 above. Current plans call for the construction of desilting basins in the subarea (see Figure 4D-3 for alternative desilting basin locations) to reduce erosion and sedimentation during and after development. The exact number, size, design, and location of desilting/retention basins will be determined in conjunction with future tentative map proposals. Monitoring and maintenance programs for these facilities would be prepared by future developers and after approval by the City, would be incorporated into the CC&Rs for the developments with these facilities in their common areas.

Implementation of the mitigation measures outlined in Issue 1 would not mitigate fully the associated cumulative effects to water quality in the subarea. These impacts would remain significant and unmitigated. Only the No Project alternative would avoid the potential cumulative impacts to water quality.

5) Landform Alteration/Visual Quality

a) **Impact:** The substantial change in aesthetic character described above would occur under both land use scenarios. This change represents a significant direct and cumulative impact from on- and off-site locations. The development of the project site would incrementally contribute to the change of the aesthetic character of the subregion in conjunction with the existing and planned development in Carmel Valley and Subareas IV and V.

a) **Mitigation:** The preservation of MSCP and urban amenity open space along with implementation of the landscaping concept as future tentative subdivision maps are

processed within Pacific Highlands Ranch and would reduce the identified aesthetic impacts. These measures would not reduce the impacts to below a level of significance. Avoidance of the impact would be accomplished by the No Project alternative.

Specific mitigation measures would be required at the future tentative map stage; specifically, prior to issuance of a grading permit, the Development Services Development Coordinator shall review the grading and landscape plans for consistency with the subarea plan guidelines. Upon completion of the grading for any future tentative map within Pacific Highlands Ranch, and associated off-site conditions, the developer shall submit a letter to Development Services from a qualified consultant certifying that all landscaping for the major manufactured slopes (e.g., roadway slopes) has been implemented. Monitoring shall be required to assure the long-term establishment of the landscaping. The maintenance program shall be effective for a three-year period following the installation of the plantings or until such time as all plantings are established. The long-term monitoring shall establish an inspection schedule, establish replanting specifications, and require written notification once a year to Development Services Department Development Coordinator by the applicant-hired consultant to verify the status of the revegetation.

If the revegetation effort includes the reestablishment of native habitat within or adjacent to the MHPA, a five-year monitoring program would be required. For erosion control or other revegetation outside the MHPA and not part of any biological mitigation, the revegetation plan must conform with the City's Landscape Technical Manual with a monitoring period of 25 months.

b) Impact:

Subarea Plans 1 and 2. Both grading concepts associated with the proposed land use scenarios would require substantial alteration of the topography to develop and access the site. The amount of earthwork anticipated under both Subarea Plans would substantially exceed the City's significance threshold for grading impacts of 2,000 cubic yards per graded acre. The filling of drainages and grading of the broad mesa areas would represent alterations to the existing topography and are considered to be significant direct and cumulative landform alteration impacts.

Carmel Valley Neighborhood 10 Precise Plan. The additional area of grading (canyon fill and associated manufactured slope) within Neighborhood 10 would represent a significant landform alteration impact.

b) Mitigation:

Subarea Plans 1 and Plan 2. Specific mitigation measures which would be required at the future tentative map stage include that prior to issuance of a grading permit,

Development Services shall review the grading plans for consistency with the subarea plan guidelines. These measures include using slope rounding and blending techniques where manufactured slopes meet natural slopes, varying slope gradient and width, and contouring edges to achieve a more natural appearance. Implementation of these measures would reduce the landform alteration impact, but not to below a level of significance. However, only implementation of the No Project alternative would avoid the landform alteration impact. These adverse effects comprise significant and unmitigable direct and cumulative impacts of the proposed project.

Carmel Valley Neighborhood 10 Precise Plan. As described in the previous EIRs for Neighborhood 10 (City of San Diego 1993 and 1997), mitigation for landform alteration impacts include that all manufactured slopes greater than 10 feet in height be contour graded and minimized during the final engineering design. As with the landform alteration impacts associated with the Subarea Plans, these measures would not reduce the impact to below a level of significance. Implementation of the contour grading measures would occur at the time grading permits are approved.

c) **Impact: Subarea Plan 1 and Plan 2.** Based on the steep slope encroachment analysis prepared for both subarea plans (see Land Use, Chapter 4A, Issue 2), significant impacts are anticipated on canyons, bluffs, or hillsides in Pacific Highlands Ranch.

c) **Mitigation: Subarea Plan 1 and Plan 2.** Although both subarea plans have been designed to minimize impacts to steep slopes strict compliance with the encroachment thresholds in the development regulations of RPO would require a project redesign. Both plans' inconsistency with the RPO encroachment provisions can be avoided with implementation of the No Project alternative and mitigated to below a level of significance by adoption of a RPO alternative. These alternatives are discussed in Chapter 8 of this EIR.

6) Cultural Resources

a) **Impact:** Twenty-four sites have been found not significant, six sites are in open space areas and should be indexed prior to recording tentative maps for future projects, two sites are in open space and may be potentially significant and require additional evaluation, and one site is located outside of the project boundaries and will require some evaluation when a project is proposed for this property.

The resulting loss of all of the sites on this project is considered a significant cumulative loss of cultural resource information. The destruction of a number of these sites prior to indexing or testing of any kind constitutes a significant impact as important information, which may have been present in these sites, has been lost without record.

There are four sites (CA-SDI-6912, loci B&E, -13,096, -14,003, and -14,562) which have been found to be important/significant resource areas; therefore, impacts to these sites would be considered significant. As presently designed, all of these sites will be destroyed by construction grading. Mitigation of impacts to these sites can be accomplished if they are not found to be significant under the City of San Diego's Resource Protection Ordinance. The current findings for these sites are that they are potentially eligible for nomination to the National Register and are significant under criteria of CEQA. A finding of National Register importance would be viewed as meeting one of the criteria of RPO importance. The State Historic Preservation Officer (SHPO) has not made a finding on the eligibility of these sites as yet. Destruction of a site that is considered to be important under RPO would constitute a significant unmitigated impact. In the event that federal money or federal actions are elements of project development, sites within the project area would be evaluated under Section 106.

a) **Mitigation:** Mitigation, monitoring, and reporting steps are a requirement for any site that is found to be significant and where direct or indirect project impacts cannot be avoided. The devising of a project impact mitigation plan is uniquely tied to the particular resource under consideration. The preferred alternative for any significant or important resource area is avoidance. In the event that avoidance is not feasible, some type of impact mitigation should be completed. The level of work is dependent upon the nature, size, and content of the cultural resource site and upon the types of research that can be accomplished through the recovery and analysis of data from the site.

Resource sites CA-SDI-13091, CA-SDI-13095, CA-SDI-13097, CA-SDI-13099, CA-SDI-13101H, CA-SDI-14001H, CA-SDI-7202, CA-SDI-7204, and CA-SDI-6697/H are avoided by the present construction grading design which places these sites in open space. As specific project plans are proposed some level of site assessment would be required. In the event that these sites will remain in open space the minimal treatment would be the completion of a site indexing which would provide a baseline of information on the deposit content. Indexing would involve the excavation of a minimum of two sample units and a report of findings with updated site record information and recommendations for permanent preservation.

Testing and survey reconnaissance indicate that CA-SDI-13093, CA-SDI-13098, CA-SDI-6914, and CA-SDI-7205 do not contain meaningful information and that additional sampling will not provide the scientific community or public with previously unknown information regarding the prehistoric past. No further work is recommended for these sites.

CA-SDI-14002 (-6916, -6917), CA-SDI-13092, and CA-SDI-6913 are considered potentially significant until fieldwork can be completed to assess their condition and data content. This work is presently being accomplished.

Eight recorded sites were not relocated because they no longer exist. These sites do not require any additional investigation. These sites include CA-SDI-10138, CA-SDI-6701, CA-SDI-6915, CA-SDI-6919, CA-SDI-6920H, CA-SDI-6921, CA-SDI-7201, and CA-SDI-7203. An additional eight sites within the Ranch project area were found to not require any additional investigation as they have previously been determined to be nonsignificant resource areas. These include CA-SDI-10221, CA-SDI-13099, CA-SDI-6696, CA-SDI-6698, CA-SDI-6700, CA-SDI-6911, CA-SDI-6918, and CA-SDI-7206.

7) Air Quality

a) **Impact:** The proposed project would result in significant cumulative air quality impacts under the City's significance thresholds as discussed in Chapter 6 of this EIR.

a) **Mitigation:** No mitigation is available for cumulative air quality impacts at the project level. The project's contribution to cumulative air quality impacts is discussed in Chapter 6, Cumulative Effects. The No Project alternative would avoid potential significant air quality impacts.

8) Geology/Soils/Erosion

a) **Impact:** There are no significant soil or geologic conditions that were observed or known to exist on the project site which would preclude development on the property. However, potentially significant geologic conditions exist which require mitigation, including ancient landslides, expansive soils, unstable cut slopes, alluvial soils, poorly consolidated soils, and ground shaking due to an earthquake.

a) **Mitigation:** For each specific development application in Pacific Highlands Ranch, the City will require the applicant to submit a detailed geotechnical study by a qualified geotechnical firm. The conclusions and implementation of the recommendations provided in these reports would mitigate the potentially significant effects of soil and geologic conditions for future developments in Pacific Highlands Ranch to below a level of significance. The types of mitigation requirements which the feasibility studies are likely to contain are summarized below.

General Measures

1. In areas of proposed development, landslides, improperly compacted fill soil, weak claystone beds, and potentially compressible deposits of alluvium and colluvium may require special attention. Buttresses, stabilizing fill material, or other methods of stabilization will probably be required in developed areas where weak claystone beds or landslides are encountered. In areas where landslides exist off-site, and where stabilization is not feasible, setbacks may be required.

2. The Mission Valley and Friars Formations, and some areas of topsoil, may include highly expansive soil. Based on this review of geologic units on the site, it is anticipated that an adequate quantity of low expansive soil exists on the site to mitigate the adverse impact of expansive soil, when it is encountered.
3. If there are proposed improvements that will be sensitive to potential settlement, partial removal and recompaction of compressible alluvium and colluvium will be necessary.
4. It is anticipated that areas of perched groundwater may exist within low-lying alluvial areas. Subdrains or other remedial measures will be necessary where drainage courses are proposed to be filled.
5. For the purpose of preliminary design, it is recommended that portions of the site that are subject to inundation due to a dam failure upstream be located and considered for restricted usage.

Grading

For the purpose of preliminary design, cut and fill slopes shall be designed no steeper than 2:1. The shear strengths of existing soil and rock units will generally limit safe allowable slope height. The potential impact of geologic conditions on slope stability shall be evaluated in areas of proposed high cut slopes.

Foundations

The dominant soil conditions on the site are generally suitable for supporting conventional spread footings, if the soil is in a dense and undisturbed condition or in a properly compacted condition. The actual soil characteristics and proposed design parameters for structures on the site will determine minimum footing dimensions and requirements for reinforcement. These factors are not currently known; however, it is estimated at this time that spread footings that are designed in accordance with the Uniform Building Code will be designed for an allowable soil bearing pressure of at least 2,000 pounds per square foot.

Drainage and Maintenance

Proper surface drainage shall be provided and maintained, as it is essential to soil stability and to reduce the potential for erosion. Drainage swales shall be installed on graded pads to conduct storm or irrigation runoff to controlled drainage facilities and away from buildings and the tops of slopes. Measures shall be taken to ensure that storm and irrigation water does not flow over the tops of cut or fill slopes.

Consultation and Plan Review

A more comprehensive soil and geologic evaluation shall be performed prior to providing final grading plans for the site. This evaluation shall be required to be implemented as a condition of final maps and grading plans. A geotechnical engineer shall also perform an on-site reconnaissance. A report shall be submitted for review and approval to the City's Engineering and Development Department prior to issuing grading permits.

b) Impact: Future grading activities for the implementation of specific development projects in Pacific Highlands Ranch would result in a potentially significant increase in soil erosion.

b) Mitigation: Prior to approval of a grading permit, each applicant for a specific development project in Pacific Highlands Ranch shall prepare a grading/construction management plan. The following mitigation measures, in addition to those listed in the Hydrology/Water Quality section of this MEIR (Chapter 4.D), shall be incorporated into the plan, if appropriate. The City's Development Services must approve the grading/construction management plans before a grading permit is issued and grading will commence. The geotechnical engineer shall inspect all cut and fill slopes and foundation work. A landscape architect will observe the revegetation of graded slopes. Each of these experts shall submit a report to the City.

1. Areas that have been stripped of native vegetation or areas of fill material shall require particular attention. These areas may require desilting basins, improved surface drainage, or planting of ground covers early in the improvement process, to reduce the potential for erosion.
2. Short-term measures for controlling erosion shall be incorporated into grading plans for the site. These measures shall include sandbag placement and temporary detention basins, as required by the City's Engineering and Development Department.
3. Catch basins shall be provided during grading activities.
4. Grading activities may be restricted during the rainy season, depending on the size of the specific operation. This season typically encompasses November through March. Grading activities may otherwise be restricted by their proximity to sensitive wildlife habitat.
5. After grading, slopes shall be immediately revegetated or hydroseeded with erosion-resistant species. These plants should be carefully irrigated to ensure coverage of the slopes prior to the next rainy season.

6. Measures to control construction sediment shall be implemented in areas near watercourses. These measures may include interim desiltation basins, sandbags, hay bales, or silt fences, which shall be placed at the toe of slopes to prevent erosion. Punch straw or matting shall be installed to stabilize graded slopes and prevent the slope or construction material from sloughing into watercourses.

9) Natural Resources

a) **Impact:** As described in the NCFUA Framework Plan EIR, the direct impacts to prime agricultural resources on the project site from open space preservation and development are considered significant. The incremental loss of land being used for agriculture is also considered a significant cumulative impact and is identified as such in Chapter 6 of this MEIR.

a) **Mitigation:** Only implementation of the No Project alternative would reduce the identified agricultural resources impact associated with potential future development to below a level of significance.

10) Paleontological Resources

a) **Impact:** The potential for significant fossils to occur in the formations of the subarea plan is moderate to high in all areas planned for development of the Pacific Highlands Ranch Plan; therefore, the grading necessary to implement the subarea plan could result in significant impacts to paleontological resources.

a) **Mitigation:** The Pacific Highlands Ranch Plan would require that all future tentative maps and VTMs approved include a condition for the implementation of a monitoring and salvage program for the recovery of paleontological resources during development. This program would reduce potential impacts to paleontological resources to below a level of significance and shall include the following steps:

1. Prior to any grading activities and/or the issuance of permits, the applicant shall provide a letter of verification to the Environmental Review Manager of the Land Development Review Division (LDR) stating that a qualified paleontologist and/or paleontological monitor has been retained to implement the paleontological monitoring program. The requirement for monitoring shall be noted on grading plans. All persons involved in the paleontological monitoring of grading activities shall be approved by LDR.
2. The qualified paleontologist or paleontological monitor shall attend any preconstruction/pregrading meetings to consult with the excavation contractor.

3. The paleontologist or paleontological monitor shall be on-site full time during excavation into previously undisturbed formations. The monitoring time may be decreased at the discretion of the paleontologist in consultation with LDR, depending on the rate of excavation, the materials excavated, and the abundance of fossils.
4. If fossils are encountered, the paleontologist shall have the authority to divert or temporarily halt construction activities in the area of discovery to allow recovery of fossil remains. The paleontologist shall contact LDR at the time of discovery. LDR shall concur with the salvaging methods before construction activities are allowed to resume.
5. The qualified paleontologist shall be responsible for preparation of fossils to a point of identification as defined in the City of San Diego Paleontological Guidelines, and submittal of a letter of acceptance from a local qualified curation facility. The paleontologist shall record any discovered fossil sites at the San Diego Natural History Museum.
6. The qualified paleontologist shall be responsible for the preparation of a monitoring results report with appropriate graphics summarizing the results (even if negative), analyses, and conclusions of the above program. The report shall be submitted to LDR prior to the issuance of building permits and/or certificates of occupancy. If building plans are not required, the paleontologist shall submit the report to LDR within three months following the termination of the monitoring program.

Prior to subarea plan approval, the Development Services Business Center shall verify that the above mitigation measures are incorporated in appropriate sections of the subarea plan. These measures shall be conditions of subsequent tentative maps and VTMs and development proposals.

11) Noise

a) **Impact:** As indicated, noise levels are anticipated to exceed applicable standards for all residential uses immediately adjacent to SR-56 and the major roadways, as well as to proposed school and park uses. Noise levels could exceed 70 CNEL for professional and office building land uses depending on their placement relative to the roadways. Noise levels for commercial retail land uses are not expected to be exceeded unless they are located immediately adjacent to SR-56. Where noise levels exceed applicable exterior standards, noise impacts would be significant.

a) **Mitigation:** Mitigation of noise levels could be accomplished through the construction of noise barriers. However, due to the limited grading detail available at this stage of planning, it is not possible to determine specific barrier heights and locations.

The draft EIR prepared by the City for the middle section of SR-56 indicates that wall heights varying between 12 and 16 feet would be required to mitigate noise levels at existing residential uses (City of San Diego 1996b). Similar wall heights would be anticipated for future sensitive uses located along the SR-56 right-of-way within Pacific Highlands Ranch.

As a general rule of thumb, a barrier provides five decibels of attenuation when it just breaks the line-of-sight between the source and receiver, and adds one decibel of attenuation for each foot above the height required to break the line-of-sight. Therefore, it is anticipated that noise barriers varying from five to eight feet will be required along the other major roadways within Pacific Highlands Ranch where the roadways are located adjacent to sensitive land uses.

At the time that detailed grading plans are available for the future subdivisions within Pacific Highlands Ranch, detailed acoustical analyses shall be performed to determine the exact barrier heights and locations where required. If exterior noise levels within residential areas are found to be above 60 CNEL after mitigation, then detailed interior noise analyses shall be required as well.

12) Public Services/Facilities

a) Impact: Currently, all schools in the Del Mar Union and San Dieguito Union High School Districts are operating above capacity within the project area. The generation of additional elementary school students resulting from development of the proposed project, either under Subarea Plan 1 or Subarea Plan 2 would add to the already overcrowded schools. This is considered a significant direct and cumulative impact.

Currently, there is insufficient capacity at Earl Warren Junior High School to accommodate the additional junior high students generated by buildout of the proposed project, either under Subarea Plan 1 or Subarea Plan 2. This is considered a significant direct and cumulative impact of the project.

Currently, Torrey Pines High School is operating above capacity. The estimated generation of additional high school students would contribute to the overcrowding of the school. This is considered a significant direct and cumulative impact.

Development of the subarea plan would incrementally increase the demand for fire services; however, both subarea plans provide a site for a double fire station. Until the new fire station is operating, the Fire Department's potential inability to provide a maximum six-minute first response time would be considered an interim significant impact.

a) **Mitigation:** The development of the proposed on-site elementary, junior high, and high schools would accomplish mitigation of the project's direct impact to schools from the subarea plan. School facilities financing and mitigation agreements between the affected school districts and the project applicant would be required at the time the Subarea Plan is approved by the City Council to ensure that the impacts on school facilities are mitigated to a level less than significant. In addition, prior to granting a ministerial or discretionary entitlement for a parcel, such parcel shall be subject to the terms of a mitigation agreement entered into by the landowner and the applicable School Districts or included in a community facilities district established by the applicable School Districts and authorized to fund the acquisition of school sites and construction of schools.

Until the new fire station is operating, developers shall demonstrate to the satisfaction of the City Fire Department that a response time of six minutes or less from Fire Station 24 to all portions of new developments can be achieved. For those areas of such new developments where a six-minute response time cannot be provided, individual sprinkler systems or other construction or site design safeguards, approved by the Fire Department, shall be required prior to the issuance of building permits.

b) **Impact:**

Water and Sewer Facilities

Potentially significant impacts to water and sewer facilities are anticipated with the development of the subarea due to a lack of existing facilities to serve the area.

Waste Management Services

The project could generate a significant amount of construction debris during the construction phase. Also, during the ongoing use of the site solid waste generation would exceed the 60 tons/year and 52 tons/year threshold of significance for solid waste impacts for residential and non-residential projects, respectively, established by the City's ESD. The project would affect City waste management programs and services; however, impacts could be minimized by incorporation of recycling and waste reduction measures in project design.

b) **Mitigation:**

Water

Future developers shall be required to provide appropriate water studies consistent with the findings and conclusions of the Miramar 712/North City 610 Water Study. Each developer shall be responsible for installing all those facilities identified in the accepted studies which are necessary to serve their developments. All public water facilities shall

be designed and constructed according to the most current edition of the City of San Diego Water and Sewer Design Guide.

Sewer

Prior to any new development within the subarea, developers shall be required to provide sewer studies showing the proposed sewer system for the subarea. All public sewer facilities shall be designed and constructed according to the most current edition of the City of San Diego Water and Sewer Design Guide.

Solid Waste

The project's prime contractor in cooperation with the City of San Diego's Environmental Services Department shall develop a comprehensive waste management plan. The plan shall describe programs that would be implemented to reduce the potential for direct and cumulative impacts to the City's waste management services to below a level of significant. The plan shall address construction phase as well as long-term waste management issues. The Development Services shall review this plan to ensure that the ESD has signed the plan and certified that it is consistent with City policy regarding its waste management services.

Following is a list of options that could be considered for the construction phase of the project and specified in the waste management plan:

1. Source separation for all construction debris such as wood, aggregate, drywall, and other discarded products including glass, plastics, and cardboard at the project sites and subsequent recycling of the materials.
2. Buying recycled or using recycled content construction material, such as acoustical ceiling tiles made from newsprint, tiles made from recycled glass, insulation made from mixed paper, as well as many landscaping products such as pavement made from recycled asphalt and tires, and mulch and compost made from green waste.
3. Use of postconsumer aggregate base and mulch in project landscaping;
4. Use of drought-tolerant landscaping to minimize the amount of green waste generated.

Following is a list of options that could be considered to address long-term waste management issues:

1. Provision of each single-family unit with kitchens designed to facilitate recycling;
2. Source separation and recycling of demolition debris;

3. Provision of yard composters designed to encourage backyard composting.
4. Provide devices or chutes in multi-family residential units for convenient separation and recycling of materials.

The project applicant shall develop a solid waste management plan explaining how these options will be incorporated. The plan shall describe the location of exterior and interior storage areas for the collection of recyclables in multi-family residential and non-residential areas as required per Municipal Code Section 101.2001. The project proponent shall ensure the storage areas are located in areas convenient for use by residents or tenants and service providers.

13) Water Conservation

a) **Impact:** *Subarea Plans 1 and 2.* The project's contribution to the cumulative impact associated with water supplies would be reduced to a nominal level by the mitigation measures outlined below.

a) **Mitigation:**

Subarea Plans 1 and 2. The following mitigation measures shall be incorporated into project design guidelines to address cumulative water usage concerns.

1. Limit grading in areas where no construction is proposed; thereby reducing the need for planting and irrigation of graded areas.
2. Provide lifts of low-clay content soil in landscaped areas to improve infiltration.
3. Reduce runoff potential from landscaped areas by using berming, raised planters, and drip irrigation systems.
4. Install soil moisture override systems in all common irrigation areas to avoid sprinkling when the ground is already saturated.
5. Identify in the plant materials list in the project design guidelines whether or not plants are native or naturalize easily and incorporate a list of local California sources for native plants.
6. Incorporate low-flush toilets, low-flow faucets, and timers on sprinklers (including nighttime watering) into project design.
7. Provide information regarding water conservation measures to new residents at the time of lot purchase.

The Development Services Development Coordinator shall review grading, landscape, and building permits to ensure the above measures have been noted on plans.

14) Public Safety

Vectors

a) Impact: Because the proposed project contains on-site detention basins to serve the subarea, the potential for public health and safety impacts to future residents within the project site are considered potentially significant.

a) Mitigation: Mitigation measures for potential increased mosquito populations which will decrease potentially significant impacts to below a level of significance are described below. Prior to any grading activities, the applicant shall provide a letter from the County Environmental Health Department Vector Surveillance and Control Division (VSCD) to the environmental review manager of LDR verifying that a vector control program has been designed. Elements of the program may include, but not be limited to the following:

1. The detention basins shall be kept free of debris, high concentrations of nutrients which could contribute to alga blooms, and organic floatage. Any emergent vegetation (e.g., cattails and bulrushes) shall be removed only as necessary to control the mosquito problem.
2. Non-natural runoff to the detention basin shall be minimized by proper drainage patterns to prevent excessive organic material from entering.
3. Although the above measures are designed to minimize the potential for mosquito breeding in the on-site retention basins and control mosquito populations, active control measures may be necessary at times. This would include the application of a mosquito fog or insecticide spray. The use of this measure should be minimized to avoid reducing populations of other insects. Use of spray application shall be minimal and shall require coordination with VSCD, USFWS, and CDFG.
4. Maintenance of the detention basins shall be the responsibility of a homeowners association or similar maintenance district.

Candidate Findings and Statement of Overriding Considerations Regarding the Final Master Environmental Impact Report for Pacific Highlands Ranch (Subarea III)

The following Findings and Statement of Overriding Considerations are made relative to the conclusions of the final Master Environmental Impact Report (final MEIR) for the Pacific Highlands Ranch (Subarea III) Plan (LDR No. 96-7918; SCH No. 97111077).

The Pacific Highlands Ranch Subarea III Plan site is in the North City Future Urbanizing Area (NCFUA). The discretionary actions proposed by the project include a General Plan Amendment, NCFUA Framework Plan Amendment, Subarea Plan, Master Rezone, Multiple Habitat Planning Area (MHPA) Boundary Adjustment, Development Agreement, and Local Coastal Plan Amendment to develop 4,974 residential units (with potential increases up to 5,456 units depending on the need for school facilities and concomitant redesignation of school sites to residential uses); a Town Center with commercial, park open space, residential, and civic area components; elementary, junior high, and high schools; a double fire station; library; and associated public facilities and transportation network on approximately 2,652 acres. Pacific Highlands Ranch is located within the NCFUA, and abuts the northerly limits of Rancho Peñasquitos and Black Mountain Park. Del Mar Mesa (Subarea V) and Carmel Valley are to the south, Subarea IV is to the east, Subarea II is to the west, and Fairbanks Ranch and La Zanja Canyon are to the north. The project includes portions of Del Mar Mesa, McGonigle Canyon, Deer Canyon, Black Mountain Road, and the proposed State Route 56 freeway corridor.

The final MEIR indicates that implementation of the Pacific Highlands Ranch Subarea Plan would ultimately result in unavoidable significant direct and/or cumulative impacts to land use, biological resources (wetlands and native grasslands), traffic, downstream water quality, air quality, landform alteration and visual character, cultural resources, agricultural land, and mineral resources.

The final MEIR indicates that the project's direct and/or cumulative impacts on the following environmental issues can be reduced to less than significant levels through implementation of the Mitigation Monitoring and Reporting Program: transportation and traffic circulation, biological resources (upland species), hydrology/water quality, cultural resources, geology/soils/erosion, paleontological resources, noise, public facilities and services, and public safety.

The final MEIR analyzes the cumulative and growth-inducing impacts of the project, as well as alternatives to the project.

A. Public Resources Code Section 21081(a)

The City Council, having reviewed and considered the information contained in the final EIR for the project and the public record, finds (pursuant to CEQA and the CEQA Guidelines) that changes or alterations have been required in or incorporated into the project which avoid or substantially lessen the significant environmental effects as identified in the final EIR with respect to the areas of traffic circulation, biological resources, hydrology/water quality, cultural resources, geology and soils, paleontology, noise, public facilities and services, water conservation, and public safety, visual quality, geology/soils, paleontology, traffic circulation, air quality, noise, public facilities and services and water conservation.

Mitigation measures which would reduce, but not to below a level of significance, certain impacts to land use, landform alteration, biological resources, and air quality issues have also been incorporated into the project.

No measures are available to fully mitigate the significant direct impacts associated with land use, landform alteration, and biological resources; or the cumulative impacts associated with hydrology/water quality, landform alteration/visual quality, biological resources, and air quality. Only adoption of the No Project alternative or the RPO alternative would avoid or fully mitigate direct impacts and reduce the project's contributions to cumulative impacts to a nominal level. A discussion of the No Project alternative and the RPO alternative are found in Section C of these findings.

Implementation of the following recommendations would occur via the imposition of conditions of approval for the project.

1) Land Use

Impact:

Subarea Plans 1 and 2. The identified potential internal land use compatibility impacts described above in conjunction with the SR-56 alignment are considered potentially significant. The significance of this impact is also described in the Revised Draft EIR for the Middle Segment of SR-56. Also, the proposed extension of Carmel Valley Road could result in significant land use incompatibilities with the proposed Pacific Highlands Ranch residential developments along these roadways.

Finding:

Subarea Plans 1 and 2. Mitigation for the potential internal land use compatibility impacts associated with proposed land uses and the SR-56 freeway would consist of the requirement for landscaping and noise attenuation measures at the time tentative maps are processed.

2) Traffic

Impact: The following impacts are considered both direct and cumulatively significant:

- Development of 41 Phase I units east of the existing Del Mar Heights Estates.
- Project contribution of more than two percent traffic to Black Mountain Road/Park Village intersection.
- Additional traffic contribution to Black Mountain Road from SR-56 to Mercy Road (currently failing).
- Project contribution of more than two percent traffic to El Camino Real between Via de la Valle and Half Mile Drive (LOS F).
- Project contribution of 7.5 percent traffic to Camino Ruiz North or SR-56 at buildout without the third intersection (LOS E).
- Project contributions to freeway areas where wait already exceeds 15 minutes.
- Project contribution of more than 2 percent traffic to El Apajo from Via Santa Fe to San Dieguito Road.

Finding: Table 4B-14 of the draft MEIR includes all of the area's transportation improvements necessary to reduce project impacts to the extent feasible; however, not all impacts are reduced to below a significant level. Table 4B-14 includes the location of the improvement, the type of the improvement, the party responsible for the improvement, and the level of significance after mitigation.

3) Biology**Impact:**

Subarea Plan 1. The direct, indirect, and cumulative impacts to sensitive biological resources described above are considered significant. The significant impacts include loss of MSCP Tier I (13.2 acres of southern maritime chaparral and 0.6 acre of native grasslands) and Tier II (10.4 acres of coastal sage scrub and 0.1 acre of coyote bush scrub) habitats, direct and cumulative loss of riparian scrub wetland habitats (approximately 0.4 acre), and impacts to the above-identified sensitive plant and animal species identified in the MEIR.

Subarea Plan 2. The direct, indirect, and cumulative impacts to sensitive biological resources described above are considered significant. The significant impacts include loss of MSCP Tier I (12.9 acres of southern maritime chaparral and 0.6 acre of native grasslands) and Tier II (10.0 acres of coastal sage scrub) habitats, direct and cumulative loss of riparian scrub wetland habitats (approximately 0.7 acre), and impacts to the above-identified sensitive plant and animal species.

Both Plans. Although both plans would meet the MSCP requirements, cumulative wetland impacts would remain significant.

Carmel Valley Neighborhood 10 Precise Plan. The impacts to coastal sage scrub and non-grasslands would be a significant impact.

Finding: The significant direct and indirect impacts to upland biological resources would be mitigated to below a level of significance through conformance and implementation of the MSCP. The Pacific Highlands Ranch MSCP impacts and mitigation requirements are shown in Tables 4C-5 and 4C-6 of the draft MEIR. Table 4C-5 shows the mitigation requirements for Plan 1 and Table 4C-6 shows the mitigation requirements for Plan 2. These tables separate the mitigation requirements for the Pardee ownership and the non-Pardee ownerships. The identified mitigation ratios are per the adopted MSCP based on the vegetation type (Tier Designation) being impacted. As these tables indicate, there is adequate acreage on-site to mitigate for Pardee's direct impacts within Pacific Highlands Ranch. There is also adequate acreage within Subarea III to mitigate for the 8.1 acres of impacts into Tier II and Tier III habitats previously designated as open space within Carmel Valley Neighborhood 10 Precise Plan.

Other mitigation requirements identified to deal with direct and indirect impacts would be implemented at the time future tentative maps are processed and are included in the MEIR.

Mitigation Land Banks. In order to effectuate the boundary adjustments to the MHPA, a mitigation bank would be established over approximately 100-130 acres of land within the Pardee ownership in Pacific Highlands Ranch. The bank will consist of disturbed land that will be revegetated in accordance with the master revegetation plan. Restored habitats will consist of appropriate wetland and upland habitats. It is anticipated that much of the upland habitat would consist of Tier II and Tier III habitats. The City will direct project applicants needing mitigation in the North City area to purchase credits in this bank, and will accept land from this bank into the MHPA upon purchase of credits by a third party. The bank will be processed and approved expeditiously by the City in a manner that will enable establishment costs to be kept to a minimum.

A mitigation bank covering approximately 24 acres within Parcel A of Carmel Valley Neighborhood 8A would also be established as a component of the MHPA boundary adjustment process.

4) Hydrology

a) Impact:

Subarea Plans 1 and 2. Construction activities in Pacific Highlands Ranch could result in significant erosion, siltation, and water quality impacts. The increase in runoff volume and velocity due to the introduction of streets, roads, and other hardscape surfaces could result in significant adverse erosion, water quality, and flooding impacts to existing natural drainage courses and the Carmel Valley storm drain system. However, these impacts are mitigable to below a level of significance by incorporating the City's BMPs and the standard engineering practices listed below.

a) Finding:

Subarea Plans 1 and 2. Incorporation of the mitigation measures described in the MEIR into project design would mitigate potential hydrology/water quality impacts to a level of less than significant. The exact locations and design of these measures will be determined in conjunction with future specific development proposals. As a condition of future tentative map approvals, appropriate mitigation measures shall be specified on the grading plan

b) Impact:

Subarea Plans 1 and 2. Impacts to the course and flow of floodwaters are mitigable to a level of less than significant through the incorporation of the mitigation measures and BMPs identified previously under Impact A (Issue 1).

b) Finding:

Subarea Plans 1 and 2. Impacts to floodwaters would be mitigated to a level of less than significant by incorporating the mitigation measures and BMPs identified for Impact A (Issue 1) above. All flood control measures shall be reviewed and approved by the City's Transportation and Drainage Design Division of the Public Works Business Center prior to construction.

c) Impact:

Subarea Plans 1 and 2. The proposed development of Pacific Highlands Ranch has the potential to significantly impact water quality (both directly and cumulatively) in the San Dieguito River and Lagoon, Carmel Valley, and Los Peñasquitos Lagoon. Specifically,

such impacts may be associated with short- and long-term erosion and sedimentation and construction-related contaminant discharge. The proposed project's effects would be less adverse overall than those currently resulting from commercial agricultural activities on-site. The runoff of urban-generated pollutants is not considered significant (on a direct basis) due to the presence of existing regulatory controls and the anticipated incremental nature and extent of such pollutants, though the incremental contribution of urban pollutants would be cumulatively significant.

c) Finding:

Subarea Plans 1 and 2. Direct impacts to water quality would be mitigated to a level of less than significant by incorporating the mitigation measures identified for Issue 1 above. Current plans call for the construction of desilting basins in the subarea (see Figure 4D-3 for alternative desilting basin locations) to reduce erosion and sedimentation during and after development. The exact number, size, design, and location of desiltation/retention basins will be determined in conjunction with future tentative map proposals. Monitoring and maintenance programs for these facilities would be prepared by future developers and after approval by the City, would be incorporated into the CC&Rs for the developments with these facilities in their common areas.

Implementation of the mitigation measures outlined in Issue 1 would not mitigate fully the associated cumulative effects to water quality in the subarea. These impacts would remain significant and unmitigated. Only the No Project alternative would avoid the potential cumulative impacts to water quality.

5) Landform Alteration/Visual Quality

a) Impact: The substantial change in aesthetic character described above would occur under both land use scenarios. This change represents a significant direct and cumulative impact from on- and off-site locations. The development of the project site would incrementally contribute to the change the aesthetic character of the subregion in conjunction with the existing and planned development in Carmel Valley and Subareas IV and V.

a) Finding: The preservation of MSCP and urban amenity open space along with implementation of the landscaping concept as future tentative subdivision maps are processed within Pacific Highlands Ranch would reduce the identified aesthetic impacts. These measures would not reduce the impacts to below a level of significance. Avoidance of the impact would be accomplished by the No Project alternative.

Specific mitigation measures regarding landscaping would be required at the future tentative map stage; specifically, prior to issuance of a grading permit, the Development

Services Development Coordinator shall review the grading and landscape plans for consistency with the subarea plan guidelines.

b) Impact:

Subarea Plans 1 and 2. Both grading concepts associated with the proposed land use scenarios would require substantial alteration of the topography to develop and access the site. The amount of earthwork anticipated under both Subarea Plans would substantially exceed the City's significance threshold for grading impacts of 2,000 cubic yards per graded acre. The filling of drainages and grading of the broad mesa areas would represent alterations to the existing topography and are considered to be significant direct and cumulative landform alteration impacts.

Carmel Valley Neighborhood 10 Precise Plan. The additional area of grading (canyon fill and associated manufactured slope) within Neighborhood 10 would represent a significant landform alteration impact.

b) Finding:

Subarea Plan 1 and Plan 2. Specific mitigation measures which would be required at the future tentative map stage include that prior to issuance of a grading permit, Development Services shall review the grading plans for consistency with the subarea plan guidelines. These measures include using slope rounding and blending techniques where manufactured slopes meet natural slopes, varying slope gradient and width, and contouring edges to achieve a more natural appearance. Implementation of these measures would reduce the landform alteration impact, but not to below a level of significance. However, only implementation of the No Project alternative would avoid the landform alteration impact. These adverse effects comprise significant and unmitigable direct and cumulative impacts of the proposed project.

Carmel Valley Neighborhood 10 Precise Plan. As described in the previous EIRs for Neighborhood 10 (City of San Diego 1993 and 1997), mitigation for landform alteration impacts include that all manufactured slopes greater than 10 feet in height be contour graded and minimized during the final engineering design. As with the landform alteration impacts associated with the Subarea Plans, these measures would not reduce the impact to below a level of significance. Implementation of the contour grading measures would occur at the time grading permits are approved.

6) Cultural Resources

Impact: Twenty-four sites have been found not significant, six sites are in open space areas and should be indexed prior to recording tentative maps for future projects, two sites are in open space and may be potentially significant and require additional

evaluation, and one site is located outside of the project boundaries and will require some evaluation when a project is proposed for this property.

The resulting loss of all of the sites on this project is considered a significant cumulative loss of cultural resource information. The destruction of a number of these sites prior to indexing or testing of any kind constitutes a significant impact as important information, which may have been present in these sites, has been lost without record.

There are four sites (CA-SDI-6912, loci B&E, -13,096, -14,003, and -14,562) which have been found to be important/significant resource areas; therefore, impacts to these sites would be considered significant. As presently designed, all of these sites will be destroyed by construction grading. Mitigation of impacts to these sites can be accomplished if they are not found to be significant under the City of San Diego's Resource Protection Ordinance. The current findings for these sites are that they are potentially eligible for nomination to the National Register and are significant under criteria of CEQA. A finding of National Register importance would be viewed as meeting one of the criteria of RPO importance. The State Historic Preservation Officer (SHPO) has not made a finding on the eligibility of these sites as yet. Destruction of a site that is considered to be important under RPO would constitute a significant unmitigated impact. In the event that federal money or federal actions are elements of project development, sites within the project area would be evaluated under Section 106.

Finding: Mitigation requirements (i.e., site indexing and data recovery) are included in the MEIR which would provide mitigation for the impacts to significant archaeological sites. The identified level of work is dependent upon the nature, size, and content of the cultural resource site and upon the types of research that can be accomplished through the recovery and analysis of data from the site.

7) Air Quality

Impact: The proposed project would result in significant cumulative air quality impacts under the City's significance thresholds as discussed in Chapter 6 of this EIR.

Finding: No mitigation is available for cumulative air quality impacts at the project level. The project's contribution to cumulative air quality impacts is discussed in Chapter 6, Cumulative Effects.

8) Geology

a) **Impact:** No significant soil or geologic conditions were observed or are known to exist on the project site which would preclude development of the property. However, potentially significant geologic conditions exist which require mitigation, including

ancient landslides, expansive soils, unstable cut slopes, alluvial soils, poorly consolidated soils, and ground shaking due to an earthquake.

a) Finding: For each specific development application in Pacific Highlands Ranch, the City will require the applicant to submit a detailed geotechnical study by a qualified geotechnical firm. The conclusions and implementation of the recommendations provided in these reports would mitigate the potentially significant effects of soil and geologic conditions for future developments in Pacific Highlands Ranch to below a level of significance. The types of mitigation requirements which the feasibility studies are likely to contain are addressed in the MEIR.

b) Impact: Future grading activities for the implementation of specific development projects in Pacific Highlands Ranch would result in a potentially significant increase in soil erosion.

b) Finding: Prior to approval of a grading permit, each applicant for a specific development project in Pacific Highlands Ranch shall prepare a grading/construction management plan. The mitigation measures described in the Hydrology/Water Quality section of the MEIR (Chapter 4.D) and the Geology section of the MEIR.

9) Paleontological Resources

Impact: The potential for significant fossils to occur in the formations of the subarea plan is moderate to high in all areas planned for development of the Pacific Highlands Ranch Plan; therefore, the grading necessary to implement the subarea plan could result in significant impacts to paleontological resources.

Finding: The Pacific Highlands Ranch Plan would require that all future tentative maps and VTMs approved include a condition for the implementation of a monitoring and salvage program for the recovery of paleontological resources during development. This program, as described in the MEIR, would reduce potential impacts to paleontological resources to below a level of significance.

10) Noise

Impact: As indicated, noise levels are anticipated to exceed applicable standards for all residential uses immediately adjacent to SR-56 and the major roadways, as well as to proposed school and park uses. Noise levels could exceed 70 CNEL for professional and office building land uses depending on their placement relative to the roadways. Noise levels for commercial retail land uses are not expected to be exceeded unless they are located immediately adjacent to SR-56. Where noise levels exceed applicable exterior standards, noise impacts would be significant.

Finding: Mitigation of noise levels could be accomplished through the construction of noise barriers. However, due to the limited grading detail available at this stage of planning, it is not possible to determine specific barrier heights and locations. The draft EIR prepared by the City for the middle section of SR-56 indicates that wall heights varying between 12 and 16 feet would be required to mitigate noise levels at existing residential uses (City of San Diego 1996b). Similar wall heights would be anticipated for future sensitive uses located along the SR-56 right-of-way within Pacific Highlands Ranch.

It is anticipated that noise barriers varying from five to eight feet will be required along the other major roadways within Pacific Highlands Ranch where the roadways are located adjacent to sensitive land uses.

At the time that detailed grading plans are available for the future subdivisions within Pacific Highlands Ranch, detailed acoustical analyses shall be performed to determine the exact barrier heights and locations where required. If exterior noise levels within residential areas are found to be above 60 CNEL after mitigation, then detailed interior noise analyses shall be required as well.

11) Public Services/Facilities

a) **Impact:** Currently, all schools in the Del Mar Union and San Dieguito Union High school districts are operating above capacity within the project area. The generation of additional elementary, junior high, and high school students resulting from development of the proposed project, either under Subarea Plan 1 or Subarea Plan 2, would add to the already overcrowded schools. This is considered a significant direct and cumulative impact.

Currently, there is insufficient capacity at Earl Warren Junior High School to accommodate the additional junior high students generated by buildout of the proposed project, either under Subarea Plan 1 or Subarea Plan 2. This is considered a significant direct and cumulative impact of the project.

Currently, Torrey Pines High School is operating above capacity. The estimated generation of additional high school students would contribute to the overcrowding of the school. This is considered a significant direct and cumulative impact.

Development of the subarea plan would incrementally increase the demand for fire services; however, both subarea plans provide a site for a double fire station. Until the new fire station is operating, the Fire Department's potential inability to provide a maximum six-minute first response time would be considered an interim significant impact.

a) **Finding:** The development of the proposed on-site elementary, junior high, and high schools would accomplish mitigation of the project's direct impact to schools from the subarea plan. School facilities financing and mitigation agreements between the affected school districts and the project applicant would be required at the time the Subarea Plan is approved by the City Council to ensure that the impacts on school facilities are mitigated to a level less than significant. In addition, prior to granting a ministerial or discretionary entitlement for a parcel, such parcel shall be subject to the terms of a mitigation agreement entered into by the landowner and the applicable School Districts or included in a community facilities district established by the applicable School Districts and authorized to fund the acquisition of school sites and construction of schools.

Until the new fire station is operating, developers shall demonstrate to the satisfaction of the City Fire Department that a response time of six minutes or less from Fire Station 24 to all portions of new developments can be achieved. For those areas of such new developments where a six-minute response time cannot be provided, individual sprinkler systems or other construction or site design safeguards, approved by the Fire Department, shall be required prior to the issuance of building permits.

b) **Impact:**

Water and Sewer Facilities. Potentially significant impacts to water and sewer facilities are anticipated with the development of the subarea due to a lack of existing facilities to serve the area.

Waste Management Services. The project could generate a significant amount of construction debris during the construction phase. Also, during the ongoing use of the site solid waste generation would exceed the 60 tons/year and 52 tons/year threshold of significance for solid waste impacts for residential and non-residential projects, respectively, established by the City's ESD. The project would affect City waste management programs and services; however, impacts could be minimized by incorporation of recycling and waste reduction measures in project design.

b) **Finding:**

Water. Future developers shall be required to provide appropriate water studies consistent with the findings and conclusions of the Miramar 712/North City 610 Water Study. Each developer shall be responsible for installing all those facilities identified in the accepted studies which are necessary to serve their developments. All public water facilities shall be designed and constructed according to the most current edition of the City of San Diego Water and Sewer Design Guide.

Sewer. Prior to any new development within the subarea, developers shall be required to provide sewer studies showing the proposed sewer system for the subarea. All public

sewer facilities shall be designed and constructed according to the most current edition of the City of San Diego Water and Sewer Design Guide.

Solid Waste. The project's prime contractor in cooperation with the City of San Diego's Environmental Services Department shall develop a comprehensive waste management plan. The plan shall describe programs that would be implemented to reduce the potential for direct and cumulative impacts to the City's waste management services to below a level of significant. The plan shall address construction phase as well as long-term waste management issues. The Development Services shall review this plan to ensure that the ESD has signed the plan and certified that it is consistent with City policy regarding its waste management services.

12) Water Conservation

Impact: The project's contribution to the cumulative impact associated with water supplies would be reduced to a nominal level by the mitigation measures outlined below.

Finding:

Subarea Plans 1 and 2. The water conservation measures described in the MEIR would be required to address cumulative water usage concerns.

13) Public Safety

Impact: The proposed project contains on-site detention basins to serve the subarea; therefore, potential public health and safety impacts to future residents within the project site are considered potentially significant.

Finding: Mitigation measures for potential increased mosquito populations which will decrease potentially significant impacts to below a level of significance are in the MEIR.

B. Public Resources Code Section 21081(b)

The City Council, having reviewed and considered the information contained in the final MEIR for the project and the public record, finds there are changes or alterations to the project which avoid or substantially lessen the significant environmental impacts that are within the responsibility and jurisdiction of another public agency. These changes are included in the project in order to satisfy the requirements of the federal Clean Water Act Section 404 permit and a Streambed alteration Permit issued under Section 1600 of the California Fish and Game Code.

Prior to the issuance of a grading permit for the project, the applicant shall have received a federal Clean Water Act Section 404 permit and an agreement under Section 1600 of the Fish and Game Code which will be required for alterations to streambeds and for

filling in the mule fat scrub vegetation. The applicant shall demonstrate compliance with mitigation conditions to the satisfaction of the permitting agencies.

C. Public Resources Code Section 21081(c)

The City Council, having reviewed and considered the information contained in the final EIR for the project and the public record, finds there are specific economic, legal, social, and other considerations, which make infeasible additional mitigation measures and project alternatives identified in the MEIR.

1. No Project Alternative

The No Project alternative typically implies no development of the project site. This approach would result in the retention of the property in its present condition (i.e., open space and agricultural lands). As a result, the impacts relating to biological resources, landform alteration/visual quality, agricultural resources, cultural resources, public facilities and services, air quality, noise, and cumulative contribution to traffic congestion associated with the proposed Plans 1 and 2 for Pacific Highlands Ranch would be eliminated.

This alternative would not achieve the goals and objectives of the subarea plan and the adopted Framework Plan. The Framework Plan objectives of providing housing, facilities benefit assessment fees, and roads would not be achieved. In addition, the permanent contributions provided by the proposed subarea plans to the MSCP preserve would be eliminated.

This alternative is infeasible for the following reasons:

- a. This alternative would not achieve the open space goals of the proposed Subarea Plans. Specifically, the MSCP goals and MHPA boundary establishment associated with the proposed Pacific Highlands Ranch project would not occur and no substantial open space preservation would result from the No Project alternative.
- b. This alternative conflicts with the affordable housing goals of the *Progress Guide and General Plan*, which recommends that housing be provided for all income groups. Housing costs in the Future Urbanizing Area would be too high for employees in nearby job sites.
- c. This alternative provides little or no support for public transit, conflicting with the adopted General Plan transit goals and the Land Guidance study being prepared by the City.

- d. Retention of the project site in its existing state as primarily agricultural fields would be inconsistent with the approved Framework Plan designations for the site. This alternative would not take advantage of the opportunity to contribute dedicated open space to the MSCP and would not provide the housing opportunities envisioned in the NCFUA Framework Plan. In addition, key subregional traffic routes established in the Framework Plan and Subarea Plan would not be implemented.
- e. The City and County would receive much lower long-term revenues in the form of property and sales tax, resulting from the non-development of residential and commercial land use acreage.

2. Alternate Site Design - Plan 1

A conceptual alternative site design for Pacific Highlands Ranch Plan 1 (see Figure 8-1 of the draft MEIR) has been developed by the City of San Diego which, with the exception of the shown alignment of SR-56, more closely adheres to the land use concept described in the adopted NCFUA Framework Plan (see Figure 4A-1 of the draft MEIR). Like the proposed project, this alternative design for Plan 1 includes a similar number of dwelling units, a town center village area consisting of commercial uses, community park, various residential densities, and a civic area; a high school, a fire station; and the associated public facilities and transportation network. The site design also includes a junior high school, but does not include an elementary school or neighborhood park. The opportunity for a private high school would be eliminated. In addition, the alternative design includes moderately low residential densities which are not included in the proposed Plan 1.

Other differences affect the high school, which would be shifted away from the Town Center Village to a location further east and north of Carmel Valley Road. The community park and very low-density residential would also be different locations, and an employment center would not be a component of the alternate plan. Residential development would also be extended south of SR-56 near the western boundary, which is shown as MHPA open space in the proposed Plan 1. However, as with the proposed Plan 1, the limits of development and grading would cover approximately 50 percent of the subarea. The remaining 50 percent of the site would comprise the MHPA. Table 8-1 of the draft MEIR details the acreages for the proposed land uses and shows that the MHPA acreage would be increased in size under this alternative.

The differences in environmental impacts between these plans are minimal and the significance of project-related impacts would not be substantially affected. However, the open space design under this alternative, while similar to Plan 1, would differ from the open space under the proposed plan which reflects the refinements as shown in the MSCP for Subarea III.

This alternative is infeasible for the following reasons:

- a. This alternative site design would result in significant impacts on public facilities and services regarding the provision of schools within the Subarea. As described in the MEIR, this alternate land use concept would not provide for any of the elementary schools shown in the proposed Subarea Plans, resulting in significant and unmitigated schools impacts. In addition, the public high school would be located away from the Village area providing less integration of the land uses from a land use planning perspective.
- b. This alternative site design would not allow the MSCP open space goals incorporated into the proposed Subarea Plan to be achieved. Specifically, the refined MHPA boundary shown in the proposed Subarea Plan (see Figure 3-7 in the draft MEIR) along with MHPA boundary expansions at other significant MSCP Biological Core Areas (e.g., Carmel Valley Neighborhood 8A) owned by the project applicant would not be achieved under this alternative. As such, implementation of the alternate project design is not considered feasible as it would not implement the agreed-upon long-term conservation planning standpoint associated with the proposed project.

3. Alternate Site Design - Plan 2

A conceptual alternative site design for Pacific Highlands Ranch Plan 2 (Figure 8-2 of the draft MEIR) has also been developed by the City of San Diego reflecting SR-56 Alignment "D." Like the proposed project, this alternative design for Plan 2 includes a similar number of dwelling units, a town center village area consisting of commercial uses, community park, high-density residential, and a civic area; an employment center; a high school, a fire station; and the associated public facilities and transportation network. The alternate site design also includes a junior high school, but does not include an elementary school or neighborhood park. The opportunity for a private high school would be eliminated. In addition, the alternative design includes moderately low residential densities which are not included in the proposed Plan 2.

Other differences between the proposed Plan 2 and the alternate site design prepared by the City include the shifting of the high school away from the Town Center Village to a location further east and north of Carmel Valley Road. The Town Center Village would be bisected by Camino Santa Fe under this design, and the acreage shown for the employment center and specialized commercial uses would be substantially increased along the north side of the SR-56 corridor. The limits of development and grading would cover approximately 50 percent of the subarea. The remaining 50 percent of the site would comprise the MHPA. Table 8-1 of the MEIR details the acreages for the proposed land uses and shows that the MHPA acreage would be increased in size under this alternative.

The differences in environmental impacts between these plans are minimal and the significance of project-related impacts would not be substantially affected. However, the open space design under this alternative, while similar to Plan 2, would differ from the open space under the proposed plan which reflects the refinements as shown in the MSCP for Subarea III.

This alternative is infeasible for the following reasons:

- a. This alternative site design would result in significant impacts on public facilities and services regarding the provision of schools within the Subarea. As described in the MEIR, this alternate land use concept would not provide for any of the elementary schools shown in the proposed Subarea Plans, resulting in significant and unmitigated schools impacts. In addition, the public high school would be located away from the Village area providing less integration of the land uses from a land use planning perspective.
- b. This alternative site design would not allow the MSCP open space goals incorporated into the proposed Subarea Plan to be achieved. Specifically, the refined MHPA boundary shown in the proposed Subarea Plan (see Figure 3-7 in the draft MEIR) along with MHPA boundary expansions at other significant MSCP Biological Core Areas (e.g., Carmel Valley Neighborhood 8A) owned by the project applicant would not be achieved under this alternative. As such, implementation of the alternate project design is not considered feasible as it would not implement the agreed-upon long-term conservation planning standpoint associated with the proposed project.

4. Development without a Phase Shift

The project site could also be developed pursuant to the underlying A-1-10 zoning without a phase shift from Future Urbanizing to Planned Urbanizing. One scenario, which could be applied to the project site under the Framework Plan pursuant to Council Policy 600-29 and the Planned Residential Development regulations, is development at one dwelling unit per four acres.

A concept plan of a one dwelling unit per four acres with a PRD has been prepared for the Pardee ownership within Pacific Highlands Ranch using three of the SR-56 alignments: (1) Plan 1 Alignment "F"; (2) Plan 2 Alignment "D"; and (3) the central alignment. Each concept plan is shown in Figures 8-3, 8-4, and 8-5 of the draft MEIR, respectively.

For each of these concepts, this alternative would result in approximately 568 dwelling units, a golf course, driving range, clubhouse, and School Park. The total development envelope for the Pardee ownership would occur on approximately 689 acres of the total 1,665-acre Pardee ownership. The residential units would include 416 market rate units

on lot sizes varying from 18,000 square feet to 50,000 square feet and 83 affordable housing units at a density of 20 units per acre. The remaining 855 Pardee acres would remain undeveloped, and as stated in Council Policy 600-29, no future development rights would remain with the property. Each of the other ownerships within Pacific Highlands Ranch (approximately 517 acres) could be developed pursuant to the underlying A-1-10 zoning (one dwelling unit per 10 acres) resulting in approximately 52 additional units for a total of approximately 551 units.

Each of these alternatives could lessen the significant impacts associated with the two proposed Subarea Plans for Pacific Highlands Ranch. Landform alteration would be substantially reduced with the implementation of this alternative as grading for a golf course in the central portion of the site would be reduced from that necessary for the town center village, high school, employment center, and various residential densities. The golf course would also be designed to accommodate the urban amenity. Biologically, the MSCP open space corridor in the northwestern corner of the site would be expanded under this scenario with the elimination of the low-density development area.

These alternatives would reduce the traffic generation from approximately 55,000-71,010 ADT to approximately 6,660 ADT and the demand on public services and utilities (e.g., police, fire, sewer, water, and schools) would be substantially lessened. Other mitigated impacts of the proposed project, such as impacts to hydrology, cultural resources, geology, paleontology, air quality, noise, and public safety would be further reduced by implementation of this alternative.

This alternative is infeasible for the following reasons:

- a. This alternative would not achieve the open space goals of the subarea plan. Specifically, the MSCP goals and MHPA establishment associated with the proposed Pacific Highlands Ranch would not occur and no substantial open space preservation would result from the Development without a Phase Shift alternative. Without a phase shift, the MHPA open space and mitigation land banks as shown in the proposed Subarea Plans 1 and 2 and Carmel Valley Neighborhood 8A would not be permanently preserved due to the development potential of the remaining A-1-10 ownerships throughout the subarea.
- b. This alternative would not include the preparation of a financing plan for public facilities, likely resulting in public facility shortages within the planning area, and therefore, facilities impacts to adjacent communities. This would conflict with established City policy that public facilities are provided with development in accordance with the need for facilities generated by development.
- c. This alternative conflicts with the affordable housing goals of the *Progress Guide and General Plan*, which recommends that housing be provided for all income groups.

Housing costs in the Future Urbanizing Area would be too high for employees in nearby job sites.

- d. This alternative provides little or no support for public transit. The promotion of alternative modes of transportation, including pedestrian, equestrian, bicycle, and mass transit would not occur under this alternative. Buildout of Subarea II under this alternative would likely result in piecemeal, non-cohesive development leading to a land use pattern that may not efficiently support public facilities and services.
- e. Development of Pacific Highlands Ranch without a phase shift would have significant land use impacts regarding inconsistencies with the adopted NCFUA Framework Plan. This alternative would not provide the community facilities required in the Framework Plan such as the town center village, park and school facilities, and employment center.

5. SR-56 Central Alignment Alternative

This alternative plan to the two proposed subarea plans is included to address the possible adoption of the central alignment for SR-56. The SR-56 central alignment is the most direct route between the western portion of Carmel Valley and the eastern portion of Rancho Peñasquitos.

This alignment would enter Pacific Highlands Ranch in the southwest corner of the planning area as shown in Figure 8-6 of the draft MEIR. Topographically, this places the freeway in McGonigle Canyon and adjacent to Carmel Creek. However, while the alignment begins at the southwest corner of Pacific Highlands Ranch as do the other alternative alignments, instead of traversing northerly up toward the crest of the canyon, this alignment continues easterly. Near the intersection of McGonigle and Deer Canyons, the freeway would proceed in a northeast direction along the south-facing slope of Santa Monica Ridge within Deer Canyon. The freeway leaves Pacific Highlands Ranch in the southeast section adjacent to the Torrey Highlands community (Subarea IV).

The land use plan for the central alignment alternative is similar to the proposed Subarea Plan 1 with the "F" alignment for SR-56. This alternative would include up to 5,500 residential dwelling units; a Town Center and Village area consisting of commercial uses, retail uses, a community green, high-density residential, and a civic area; an employment center; three elementary schools; two neighborhood parks; a community park; one junior high and two high schools (one private and one public); a public library; a fire station; and the associated public facilities and transportation network. The limits of development and grading for the land use plan area only would cover approximately 50 percent of the 2,652-acre subarea. Additional disturbance would be required to construct the freeway south of the developed area.

This alternative is infeasible for the following reasons:

Implementation of the SR-56 Central Alignment and accompanying land use plan would not allow the City's MSCP open space goals to be achieved which have been incorporated into the Subarea Plan. Specifically, the USFWS has indicated in letters of comment on the draft MEIR for Subarea III (May 18, 1998) and the SR-56 Revised EIR (March 9, 1998) that the Central Alignment would violate the agreements for the City's MSCP Subarea Plan and cause significant unmitigable impacts to biological resources. As such, implementation of the Central Alignment for SR-56 is not considered feasible from a long-term conservation planning standpoint.

6. Resource Protection Ordinance Alternative

The identified land use impact associated with the proposed project's inconsistency with the provisions of RPO would be lessened by a project alternative, which strictly complies with the encroachment provisions of RPO. Under this scenario, a project alternative that avoids wetland encroachment and floodways, applies wetland buffers adjacent to all wetlands, reduces the excess steep slope encroachment, and avoids impacts to RPO-significant archaeology sites would reduce the identified land use impact (see Land Use, Chapter 4.A, Issue 2). Aside from the land use implications associated with the Framework Plan goals, this alternative would also lessen the other direct and cumulative impacts associated with the proposed Subarea Plans. It is considered environmentally preferable to the proposed projects.

A conceptual alternative land use plan, which incorporates these design revisions, is shown in Figure 8-7 of the draft MEIR. Under this conceptual scenario, the number of single-family units would be reduced by approximately 50 percent as the total on-site development area for residential development and the associated transportation network would be substantially reduced.

Other impacts associated with the proposed subarea plans would also be reduced under the RPO alternative. Impacts to native vegetation and landform alteration/visual quality would be reduced under this alternative. However, substantial earthwork would still be required for the grading for the development areas and the SR-56 alignment, and the impacts would remain significant and unmitigated. With the reduction in dwelling units, the project traffic generation would be reduced from 80,000 ADT to approximately 40,000 ADT. Finally, the demand on public services (schools, parks, police, and fire service) and utilities (water, sewer, and solid waste) would be lessened under this alternative.

This alternative is infeasible for the following reasons:

- a. The RPO alternative would represent a substantial decrease in the number of residential dwelling units and affect the diversity of residential housing. The goals and objectives of the NCFUA Framework Plan include providing housing within the community, promoting a balanced community in terms of housing types and economic appeal, and providing housing to accommodate people employed in the nearby business and industrial parks. Accordingly, this alternative would not fully implement these goals and objectives. The substantial reduction in housing results in a failure to provide housing and indirectly promotes an unbalanced mix of housing type.
- b. This alternative would also result in losses of the dedications and financial participation in regional public facilities, and a reduction in tax base revenues to the City. The loss of approximately 50 percent of the housing units would significantly affect the tax increment per year. The reduction of units under this alternative would also result in the loss of dwelling units contributing to the PFFP.
- c. Implementation of this alternative would also affect any financing mechanism for providing adequate public facilities because this alternative results in approximately 50 percent fewer units than provided by the proposed project. Without the project's substantial financial contribution for these public improvements as envisioned in the NCFUA Framework Plan, such facilities would experience a dramatic shortfall in revenue for their construction.
- d. This alternative would not achieve the open space goals of the subarea plan. Specifically, the MSCP goals and MHPA establishment associated with the proposed Pacific Highlands Ranch Subarea Plans would not occur. Without a phase shift in conjunction with the proposed project, the MHPA open space and mitigation land banks as shown in the proposed Subarea Plans 1 and 2 and Carmel Valley Neighborhood 8A would not occur.

**STATEMENT OF OVERRIDING CONSIDERATIONS
FOR THE
PROPOSED SUBAREA III PACIFIC HIGHLANDS RANCH-
SUBAREA PLAN**

The City Council, pursuant to State CEQA Guidelines Section 15093, having balanced the benefits of the project against its unavoidable significant direct and/or cumulative impacts of the project on land use, transportation/circulation, biological resources (wetlands and native grasslands), water quality, air quality, landform alteration and visual quality, cultural resources, and natural resources determines that the impacts are acceptable for the following reasons:

1. The project would place approximately 1,280 acres in open space for the benefit of residents, the public, and wildlife. The proposed designation of the open space, and substantial reduction of development potential within this open space, would provide a more effective regional open space system than would continued development in accordance with existing regulations. This open space preserve would provide habitat areas consistent with the MSCP, in addition to a system of wildlife corridors between Gonzales, McGonigle, and Deer Canyons, Santa Monica Ridge, and the rest of the MSCP preserve system. The steep north-facing slopes above La Zanja Canyon and the San Dieguito River valley along the northern boundary of the subarea would also be part of the natural open space system. This open space preserve area encompasses one of the few remaining natural open space areas in San Diego County which is still linked to intact natural open space areas both to the east and west, hence, its tremendous significance.
2. Provided the voters approve a phase shift for the project in November 1998, the project applicant has agreed to transfer title of Parcels A and B within Carmel Valley Neighborhood 8A to the City of San Diego, exclusive of those areas utilized for a 24-acre mitigation land bank. The entirety of these parcels consists of very high quality coastal sage scrub vegetation and southern maritime chaparral with numerous sensitive plant and animal species and is an integral component of the adopted MSCP as a part of the Carmel Mountain biological core area. The City of San Diego considers Parcels A and B within Neighborhood 8A to be a critical component of the MHPA in the North City area.
3. The project would contribute to the successful implementation of the MHPA through the conveyance of lands as open space within Subarea III. These lands include approximately 100- to 130-acre mitigation land bank on Subarea III, which would be restored to Tier 1 or other appropriate habitat.

4. The approval of this project will result in an increased generation of real property tax revenue for the City of San Diego. The City would receive real property tax increment revenues attributable to the increased value of improved real property associated with the 4,974 dwelling units for the project. Based on the assessed value of the land with implementation of the proposed improvements and a standard tax rate of 1.25 percent, total property tax for the proposed units (assuming an average valuation of \$350,000 per dwelling unit) would be approximately \$21,750,000 per tax year. A portion of these property taxes would be paid to the City. It should be noted that the estimated real estate values and the tax rate used to calculate the property tax are subject to change as individual phases of the project are implemented.
5. Provided the voters approve a phase shift for the project in November 1998, Pardee will forego receipt of payment in excess of \$6,000,000 for the dedication of the SR-56 right-of-way upon the Pardee ownership within Subarea III.
6. The Pacific Highlands Ranch Subarea Plan will provide for significant community-wide public facilities. As the plan is implemented, it will be responsible for constructing on-site a significant portion of the public facilities and infrastructure required to serve the subregion. These facilities include:
 - a) A library within the civic use area which serves the entire NCFUA.
 - b) Parts of the regional backbone circulation system, including Carmel Valley Road as a four-lane major from the southernmost project access road off-site to Shaw Ridge Road, and the extension of Camino Santa Fe to the south.
 - c) Schools serving the subregion including three elementary schools, a junior high, and a public and possibly a private high school.
 - d) A 20-acre community park.
 - e) A fire station which will provide service to the region and also wildland fire capability.
7. The project implements the land use designations of the adopted Framework Plan and provides a mix of land uses that provides housing opportunities, jobs, and public facilities in the North City area of the city. The proposed plan also encourages the use of alternative modes of transportation through the provision of transit facilities and the inclusion of bicycle and pedestrian network, and it provides commercial and civic facilities in the Town Center to meet daily needs of area residents.
8. The project provides affordable housing consistent with the goals of the NCFUA Framework Plan. The project would provide trail linkages to future planned

development, the MSCP open space, and other areas within the NCFUA which expands recreational opportunities within the region.

9. The project would generate new temporary construction-related jobs that would enhance the economic base of the region.

For these reasons on balance, the City Council finds there are economic, social, and other considerations resulting from the project that serve to override and outweigh the project's unavoidable significant environmental effects, and thus, the adverse unavoidable effects are considered acceptable.

6/11/98