

(R-97-59)

RESOLUTION NUMBER R- 287748

ADOPTED ON AUG 05 1996

WHEREAS, on February 17, 1993, Del Mar Land Management Company, Inc., G.P., submitted an application to the Development Services Department for an amendment to the Progress Guide and General Plan, an amendment to the North City Future Urbanizing Area Framework Plan, and approval of Subarea Plan for 1,134 acres in the North City Future Urbanizing Area (NCFUA) of the City of San Diego; and

WHEREAS, the permit was set for a public hearing to be conducted by the Council of The City of San Diego; and

WHEREAS, the issue was heard by the Council on July 30, 1996; and

WHEREAS, the Council of The City of San Diego considered the issues discussed in Environmental Impact Report No. 93-0152 (SCH No. 93071041); NOW, THEREFORE,

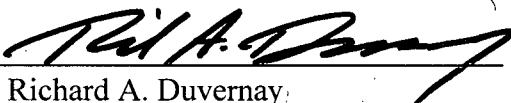
BE IT RESOLVED, by the Council of The City of San Diego, that it is hereby certified that Environmental Impact Report No. 93-0152 (SCH No. 93071041), on file in the office of the City Clerk, has been completed in compliance with the California Environmental Quality Act of 1970 (California Public Resources Code section 21000 et seq.), as amended, and the State guidelines thereto (California Code of Regulations section 15000 et seq.), that the report reflects the independent judgment of The City of San Diego as Lead Agency and that the information contained in said report, together with any comments received during the public review process, has been reviewed and considered by this Council in connection with the approval of an

amendment to the Progress Guide and General Plan, an amendment to the NCFUA Framework Plan, and approval of the Subarea Plan.

BE IT FURTHER RESOLVED, that pursuant to California Code of Regulations section 15093, the City Council hereby adopts the Statement of Overriding Considerations, a copy (Exhibit A) of which is attached hereto and incorporated herein by reference, with respect to the project.

BE IT FURTHER RESOLVED, that pursuant to California Public Resources Code section 21081.6, the City Council hereby adopts the Mitigation Monitoring and Reporting Program, or alterations to implement the changes to the project as required by this body in order to mitigate or avoid significant effects on the environment, a copy (Exhibit B) of which is attached hereto and incorporated herein by reference.

APPROVED: JOHN W. WITT, City Attorney

By 
Richard A. Duvernay
Deputy City Attorney

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07/16/97
Or.Dept:Comm.&Eco.Dev.
R-97-59
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EXHIBIT A

**FINDINGS AND STATEMENT OF OVERRIDING CONSIDERATIONS
FOR
TORREY HIGHLANDS SUBAREA IV
(DEP NO. 93-0152)
(SCH NO. 93071041)**

The California Environmental Quality Act (CEQA) requires that no public agency shall approve or carry out a project for which an environmental impact report has been completed which identifies one or more significant effects thereof unless such public agency makes one or more of the following findings:

- (a) Changes or alterations have been required in, or incorporated into, such project which mitigate or avoid the significant environmental effects thereof as identified in the completed environmental impact report;
- (b) Such changes or alterations are within the responsibility and jurisdiction of another public agency and such changes have been adopted by such other agency or can and should be adopted by such other agency; or
- (c) Specific economic, social or other considerations make infeasible the mitigation measures or project alternatives identified in the environmental impact report (Cal. Pub. Res. Code Section 21081).

CEQA further requires that, where the decision of the public agency allows the occurrence of significant effects which are identified in the Final EIR, but are not at least substantially mitigated, the agency shall state in writing the specific reasons to support its action based on the Final EIR or other information in the record (Section 15093[b] of the CEQA Guidelines). These findings contain a statement of overriding considerations (pursuant to CEQA Guidelines Section 15093[b]) which indicates that the decision-makers have weighed the benefits of the project against the unmitigated significant effects identified in the Final EIR.

The following Findings and Statement of Overriding Considerations have been prepared based on information submitted by the project applicant as candidate findings to be adopted by the decision-making body. The Environmental Analysis Section does not recommend that the decision-making body either adopt or reject these findings. They are attached to allow readers of this report an opportunity to review the potential reasons for approving the project despite the unmitigated significant effects identified in the Final EIR.

**CANDIDATE FINDINGS
FOR
TORREY HIGHLANDS SUBAREA IV
(DEP NO. 93-0152)
(SCH NO. 93071041)**

INTRODUCTION

These Findings are made relative to the Environmental Impact Report ("Final EIR") for the Torrey Highlands Subarea IV project located in the northern portion of the City of San Diego. The 1,134-acre Torrey Highlands project site is located within the 1,520-acre Subarea IV planning area within the eastern portion of the 12,000-acre North City Future Urbanizing Area (NCFUA). Torrey Highlands is located approximately four miles west of Interstate 5, and is bounded by the Rancho Peñasquitos Community to the east, Subarea V and Deer Canyon on the south, Subarea III on the west and the Fairbanks Highlands and Black Mountain Ranch approved project sites to the north.

The proposed project includes an amendment to the Progress Guide and General Plan and the NCFUA Framework Plan, and approval of a Subarea Plan. The Subarea Plan would refine the existing NCFUA Framework Plan by proposing specific locations for roads, commercial, residential and public facility land uses. The proposed project requires a vote of the electorate in order to approve the Phase Shift from Future Urbanizing to Planned Urbanizing. The City of San Diego and Caltrans are evaluating two alignment alternatives for the extension of State Route (SR) 56 through the NCFUA. As a result, the proposed Torrey Highlands Plan includes a development plan option for each of these alternatives. Features of the plan include 2,600 dwelling units, a local mixed center, a regional employment center, a joint operations center, and a major regional wildlife corridor. Also included are regional, community and neighborhood commercial centers, schools, parks and open space.

The Draft EIR analyzes in detail two alternative land use plans labeled Alternative 1 and Alternative 2. As noted in the Preface to the EIR, two additional land use plans labeled Alternatives 1A and 1B, and 2A and 2B were developed in response to comments received during the public review period for the Draft EIR. These findings were prepared to be applicable to all these possible land use alternatives. Unless otherwise noted, the use of the term Alternative 1 addresses findings for Alternatives 1, 1A, and 1B; and the term Alternative 2 addresses findings for Alternative 2, 2A and 2B.

These findings are made pursuant to the California Environmental Quality Act ("CEQA") (Cal. Pub. Res. Code §21081) and the State CEQA Guidelines (14 Cal. Code Regs. §15091 and 15093). The project applicant is Del Mar Land Management, Inc., General Partnership. The City of San Diego is the lead agency responsible for making the final discretionary decisions with respect to the project.

A. Section 21081(a) Findings

Pursuant to Public Resources Code §21081(a), the decision-maker, having independently reviewed and considered the information contained in the Final EIR, the appendices and the record, finds that,

pursuant to CEQA and the CEQA Guidelines, changes or alterations have been required in, or incorporated into, the project that avoid or substantially lessen the significant environmental effects as identified in the Final EIR with respect to the areas of: (1) land use; (2) transportation/traffic circulation; (3) biological resources; (4) hydrology/water quality; (5) landform alteration/visual quality; (6) cultural resources; (7) air quality; (8) geology/soils; (9) agriculture/natural resources; (10) paleontology; (11) noise; (12) public facilities and services; (13) water conservation; (14) safety; and (15) population. Specifically,

1. Land Use

Impact: The proposed project includes future construction of 2,600 residential units. The NCFUA Framework Plan contains guidelines for provision of affordable housing within the NCFUA. Failure to comply with the Framework Plan guidelines would represent a significant land use impact.

Findings: Impacts related to affordable housing would be reduced to below a level of significance with incorporation of the following mitigation measure. Prior to approval of future discretionary tentative maps and/or permits, the applicant shall demonstrate to the satisfaction of the Director of the Development Services Department that the project meets the affordable housing requirements as outlined in the Subarea Plan. The total number of units required for the Tentative Map or permit shall be identified, and these units shall be permanently designated as affordable housing for low and moderate incomes as defined by Section 7 of the Framework Plan.

Impact: Future development could result in land use impacts regarding the compatibility of adjoining uses. In addition, construction activities could have a significant impact on adjacent residents.

Findings: With implementation of the following measures, impacts would be reduced to a level below significance. Prior to construction of specific development projects within Subarea IV, the developer shall provide the City Development Services Department with a construction management plan. The plan shall address traffic management of construction vehicles, siting of construction trailers and equipment staging areas, construction employee parking, maintenance of access to homes and businesses, dust and noise control, and construction phasing through incorporation of measures identified in *Section IV-D, Hydrology/Water Quality; IV-G, Air Quality; IV-H, Geology/Soils; and IV-K, Noise*. These measures are associated with preparation of a storm water pollution prevention plan, erosion control, dust abatement, and specified construction times. Construction would be phased to minimize the amount of graded slopes occurring at any one time in order to minimize potential erosion impacts.

2. Transportation/Traffic Circulation

Impact: The cumulative condition analysis for Alternatives 1 and 2 considers buildout development of the NCFUA Subarea Plans and traffic surrounding future development assuming that major infrastructure improvements are in place. With implementation of Alternatives 1 or 2, cumulative impacts were assessed for street segments, intersections, and freeway on-ramps. Significant cumulative impacts are anticipated to occur if the project contributes more than 2%.

Most street segments studied would operate at acceptable (LOS D or better) conditions, based on daily traffic volumes, assuming implementation of the future circulation system identified in the adopted Framework Plan improvements, and completion of the regional circulation system. In fact, most street segments would operate at LOS C or better. The following street segments, however, are expected to experience worse than LOS D conditions in the future and are considered to be significantly impacted by the project even with planned street improvements:

- Mercy Road – east of Black Mountain Road;
- San Dieguito Road – west of Camino Ruiz; and
- Scripps Poway Parkway - east of I-15 northbound ramps

Under full buildout, long-term conditions (assuming the regional transportation system is in place), the Torrey Highlands project will have significant cumulative impacts to these three traffic circulation facilities.

Findings: There are no mitigation measures available that would fully mitigate these impacts. The project includes a phasing plan and project specific improvements (discussed below) that would partially mitigate traffic impacts. These mitigation measures would not reduce these significant cumulative traffic impacts to below a level of significance. Adoption of project alternative B or D would reduce project density which would reduce but not fully mitigate cumulatively significant impacts.

Impact: In response to significant cumulative, regional traffic impacts, the Torrey Highlands project proposes a phasing plan to provide transportation facilities concurrently with the need for these improvements. Five development thresholds (see page IV-B-25 of the EIR) have been proposed to ensure that the plan buildout is phased concurrently with the provision of key transportation facilities. During the five phases proposed by the project, there will be significant cumulative impacts to some non-freeway traffic facilities that cannot be mitigated to a level where the facilities operate at acceptable levels of services.

During Phases 1 and 2, there will be significant unmitigated cumulative impacts on freeway facilities attributable to the project that cannot be mitigated to acceptable levels under the proposed phasing plan. These unmitigable traffic impacts include the following:

- I-15/Ted Williams Parkway interchange
- I-5 Northbound/SR-56 Eastbound interchange
- I-5 Southbound/SR-56 Eastbound interchange

Findings: The project proposes offsite improvements and a transportation phasing plan as mitigation for future buildout traffic impacts. There will be significant cumulative impacts to some non-freeway traffic facilities that cannot be mitigated to a level where the facilities operate at acceptable levels of service. However, measures have been incorporated into the project to mitigate impacts to the extent feasible.

The Torrey Highlands project development intensity will be phased to provide transportation facilities concurrently with the need for these improvements. Many key transportation facilities are of a regional nature to be funded by others, while other developments require funding from the project. Five development thresholds have been proposed to help ensure that the project is phased concurrently with the provision of key transportation facilities. The Engineering Department shall review future tentative maps for compliance with the phasing plan outlined above and in Table IV-B-11 of the EIR. The proposed phasing plan will not fully mitigate impacts to three freeway interchanges. Mitigation to below a level of significance would require adoption of an alternative phasing plan (Alternative E in Section VIII of the EIR).

Impact: Future development of Subarea IV would result in traffic generation that would have a significant impact on local streets and intersections.

Findings: With inclusion of the following mitigation measures, impacts to local streets and intersections would be mitigated to a level below significance. Subsequent development proposal within the project site shall be conditioned to assure and/or provide improvements to the signals, intersections, internal roads, interchanges and other improvements as appropriate, based on the level of project impact to these facilities. The improvements are listed in Table IV-B-16 of the EIR (pp. IV-B-38).

3. **Biological Resources**

Impact: As noted on pages IV-C-42, 44 and 45 of the EIR, future project implementation of either alternative land use plan would require grading of the site that would result in direct significant impacts to six vegetation types (Diegan coastal sage scrub, scrub oak chaparral, wildlife corridor-supporting chaparral, southern willow scrub, mule fat scrub and vernal pools) and eight sensitive species (summer-holly, California adolphia, Nuttall's scrub oak, San Diego mesa mint, San Diego button-celery, San Diego fairy shrimp, orange-throated whiptail, San Diego horned lizard, and coastal California gnatcatcher). The central alignment of SR-56 (Alternative 1) would result in significant impacts to California gnatcatcher and summer-holly, and the northern alignment of SR-56 (Alternative 2) would result in significant impacts to California gnatcatcher. Brush management activities would result in significant impacts to Diegan coastal sage scrub. Cumulatively significant impacts to habitat for black-tailed jack rabbit, four observed raptor species and loggerhead shrike would also occur. Indirect impacts to biological resources with implementation of Alternative 1 and 2 that are also considered significant are associated with increased noise, runoff, artificial illumination, pollution, and other urbanization pressures on biological resources.

Findings: Implementation of the following mitigation measures would reduce biological impacts to a level below significance: Proposed mitigation measures are based on CEQA, RPO, and NCCP, and are intended to be consistent with the City of San Diego's MSCP Preserve Plan when it is adopted. The Draft MSCP currently is being developed; draft policies currently being considered as part of the MSCP have been addressed where appropriate.

Impacts of development with the Subarea will be mitigated on two levels. Initially, the Plan will refine the boundary and set aside the proposed MSCP preserve which will be similar to the Environmental Tier as defined in the NCFUA Framework Plan. Ultimately, actual losses of sensitive biological resources associated with future development projects within Torrey Highlands will be mitigated through a program consisting of a combination of the following compensation options: onsite preservation, onsite restoration, payment of fees (for habitat acquisition), and offsite preservation.

The acquisition and preservation of the MSCP Corridor will occur utilizing the following two measures. First, once the City Council has approved placement of the proposed Torrey Highlands Phase Shift on the ballot, property owners will make an Irrevocable Offer to Dedicate an open space easement on all lands within the proposed MSCP preserve to the City of San Diego to become accepted by the City after a successful phase shift vote. The second measure will be implementation of a strategy for the acquisition of the preserve utilizing the menu of options outlined below.

Measures identified include:

- preservation of resource-based open space onsite (253 acres for Alternative 1; 270 acres for Alternative 2);
- Project-level mitigation to compensate for losses by area (CSS, 1:1 onsite or 2:1 offsite; scrub oak chaparral, 2:1; southern willow scrub and mule fat scrub, 3:1; open water pond, 2:1; and vernal pools, 3:1 or 1:1),

Four mitigation options are available: 1) Onsite preservation within the MSCP preserve within the NCFUA; 2) Onsite restoration within the MSCP preserve within the NCFUA; 3) Payment of fees into a habitat acquisition fund; and 4) Offsite acquisition within the MSCP preserve outside of the NCFUA.

- Habitat restoration and species-specific restoration;
- Protective fencing of sensitive areas;
- Sensitive lighting and landscaping
- Preservation of wetlands in open space amenity areas;
- Siting of future trails and sewer lateral lines in non-sensitive areas; and
- Use of alternative brush management techniques when possible.

It is noted that the mitigation program outlined above provides a framework upon which future mitigation requirements will be considered, however, future projects will be subject to any adopted ordinances or permit requirements in effect at the time of the Tentative Map level of project review.

Impact: The project would have a significant direct impact associated with the movement of any resident or migratory wildlife species. Development would restrict wildlife movement to the proposed MSCP open space area. Inadequately designed road crossings, uncontrolled lighting and non-contiguous native vegetation within the preserve would impede and discourage wildlife movement through the open space.

Findings: With implementation of the following measures, impacts associated with resident or migratory wildlife movement would be mitigated to a level below significance:

Prior to approval of improvement plans for Carmel Valley Road over the tributary to McGonigle Canyon in the central portion of the subarea, a wildlife crossing shall be incorporated into the Carmel Valley Road as shown on the Subarea IV Land Use Plan. Construction of a bridge meeting these criteria is preferred. Multiple culverts may be substituted for a bridge if such culverts are determined by the Director of Development Services to meet these criteria. Construction of the wildlife crossing under Carmel Valley Road is a mitigation requirement and project feature of the already approved Fairbanks Highlands project (DEP No. 88-1041) located directly north of Torrey Highlands. The subdivider shall submit a preliminary design for the wildlife undercrossing, satisfactory to the City Engineer and Director of Development Services.

Prior to approval of tentative maps encompassing a portion of the resource-based MSCP preserve, detailed design of the hiking trails within the resource-based preserve, as conceptually shown on the Subarea IV Plan, shall be prepared. Trails shall be located in a manner which would not adversely impact natural plant or wildlife functions of the MSCP preserve. Existing trails may remain; however, no new trails shall be located within the habitat protection areas of the MSCP. Crossings of the habitat protection areas shall be kept to a minimum. Selective fencing shall be used to protect the biological buffer and habitat protection area wherever necessary (e.g., roads) to supplement protection provided by perimeter fencing along development located adjacent to the preserve. The design and location of trails within the MSCP preserve shall be reviewed and approved by the Director of Development Services.

Prior to approval of tentative maps or planned development permits, conditions of approval shall be applied to insure that exterior lighting in development areas is designed to avoid illumination of the habitat protection area.

Impact: The City of San Diego's Draft Multiple Species Conservation Program (MSCP) proposes a preserve system that is intended to maintain the long-term biological diversity of the region and conserve viable populations of rare, threatened, and endangered plant and animal species. The Torrey Highlands project is entirely within the MSCP study area, and a portion of Torrey

Highlands has been included within the proposed MSCP preserve. Alternatives 1 and 2 would impact vernal pools, southern willow scrub, chaparral, coastal sage scrub and grassland, which are considered sensitive, rare or declining. In addition, impacts to MSCP priority plant species San Diego button-celery, coast barrel cactus, and San Diego mesa mint would occur. Lighting at road crossings would reduce preserve effectiveness. These impacts are considered significant.

Findings: The mitigation measures noted above for sensitive habitats, sensitive species, wildlife corridor/wildlife movement, and indirect impacts would mitigate impacts related to MSCP resource issues to below a level of significance. The preservation and restoration of the proposed MSCP preserve onsite, together with project specific mitigation, would meet the intent of the MSCP with regard to protection of sensitive regional biological resources.

4. **Hydrology/Water Quality**

Impact: Project implementation would not require substantial modifications to the natural drainage system. The natural drainage system is comprised of McGonigle and Deer Canyons, both of which would be preserved in open space. Filling in approximately 10.6 acres of the upper reaches of McGonigle Canyon for low density residential uses and Camino Ruiz would not significantly affect the natural conveyance capacity of the canyon. In the case of Camino Ruiz and residential developments, properly designed culverts and flow dissipators would be constructed to maintain appropriate volumes and prevent flooding. In addition, the development areas and the portion of Camino Ruiz that would encroach into 10.6 acres of the designated 100-year floodplain area would be located substantially above the anticipated water levels expected during a 100-year storm event. Although developed areas would be above 100-year flood levels, encroachment into the 100-year floodplain is considered a significant impact.

Findings: Implementation of the following measures would reduce impacts to below a level of significance. Future tentative maps and development permits shall require preparation of a drainage study in accordance with the City of San Diego Drainage Manual, and incorporation of necessary stormdrain facilities extending to a satisfactory point of disposal for the proper control and disposal of storm runoff. In addition, a letter of map revision (LOMR) shall be completed prior to acceptance of subdivision and submitted to the City Engineer. The LOMR shall be submitted to the Federal Emergency Management Agency (FEMA) to revise the FEMA flood insurance rate maps to show encroachment of the project into the 100-year floodplain. Evidence of submittal and approval by FEMA of the LOMR shall be provided to the Director of the Development Services Department prior to approval of tentative maps for the project.

Impact: The exposure of cleared and graded areas to rain and surface runoff during the project grading and construction phases would cause a significant potential for short-term water quality impacts to local drainages and downstream in Carmel Creek and the San Dieguito River. Additionally, centralized storm-drainage systems can concentrate runoff and increase flow

velocities that can also contribute to downstream bank erosion and water-quality impacts.

The long-term water quality impacts of urban runoff from future streets, parking areas and projects such as the City of San Diego Joint Operations Center would introduce contaminants such as hydrocarbons, dissolved and particulate metals (including lead), toxic materials, pathogens, floatables and other solid wastes. Fertilizers and pesticides applied to landscaping would also runoff to drainage channels. These pollutants would cumulatively contribute to contaminant loading and water-quality degradation in Carmel Creek, the San Dieguito River and estuary. These impacts are considered significant.

Findings: Implementation of the following measures would reduce future direct water quality impacts to below a level of significance. Mitigation measures IV-D.3 and IV-D.4 (pp. IV-D-14, 15) require construction of siltation and erosion control facilities and would be maintained to protect onsite and downstream properties. Temporary and permanent drainage facilities would be designed and built in accordance with the City of San Diego Drainage Design Manual and would incorporate the most current Best Management Practices (BMPs) as defined in the NPDES guidelines and detailed in the "California Storm Water BMP Handbook." As the BMP's and BAT's (Best Available Technology) evolve and change over time, it is expected that specific solutions would be proposed at the Tentative Map stage of individual future developments. These measures would reduce direct significant water quality impacts to a level below significance. However, the project would have a significant cumulative impact, due to its contribution to areawide water quality impacts, that is not mitigable.

5. Landform Alteration/Visual Quality

Impact: The change in the overall scenic quality of the site from grass-covered mesas and natural canyons to an urbanized community, including commercial cores, major roadways, residential areas and a City Operations Center, would be a significant, unmitigable long-term impact. From Black Mountain Park, the proposed project would represent an incremental impact on the cumulative change in the visual character of the site and surrounding area which would occur as development continues.

Views from the onsite portion of the Focused Planning Area of the San Dieguito River Valley Regional Open Space Park would be adversely affected by manufactured slopes and development areas along the canyon rims. These impacts would be significant but mitigable through preservation of La Zanja Canyon in the resource-based MSCP open space. Pedestrian access would not occur into La Zanja Canyon. In addition, Community Design Guidelines are included in the Subarea IV Plan which include requirements for setbacks adjacent to the MSCP open space and grading and landscaping techniques to buffer views of developed areas. Impacts to views from Deer Canyon and Del Mar Mesa of the Joint Operations Center are regarded as significant. Impacts to views from Black Mountain Road would not be significant. Impacts to views from public roadways that extend through the site including SR-56, would not be significant because the project incorporates community design guidelines which ensures that significant viewsheds are preserved and views of developed areas are buffered.

Findings: Implementation of the following measures would reduce significant visual character impacts, but not to below a level of significance.

Mitigation is not available that would reduce the significant impacts associated with the change in visual character of the site to below a level of significance. Only the No Project Alternative would completely mitigate this impact. Impacts to onsite landmarks associated with views of developed areas from offsite vantage points would be reduced but not mitigated through implementation of measures contained in the Subarea Plan. Only adoption of the No Project Alternative or the Environmentally Sensitive Alternative would mitigate impacts to onsite landmarks. Measures included in the Subarea Plan to reduce visual impacts include grading restrictions, use of berms and terraces to achieve visual separation of land uses, variable slopes, use of native landscaping, street landscaping, edge interface landscaping, and open fence design along the preserve.

Impact: Implementation of the proposed master conceptual grading plan would result in the following significant impacts to landform:

- Due to the type of grading required to accommodate proposed uses, impacts of the proposed project to a knoll, located in the central portion of the site, are anticipated to be significant.
- Due to the importance of a tributary extending east of McGonigle Canyon as an onsite landform, and because extensive disturbance of steep slopes associated with the tributary would be required to accommodate proposed uses, it is anticipated that grading allowed by the master plan would significantly alter the tributary landform.
- Due to the disturbance of steep slopes required and that any disturbance would be visible from the canyon floor and surrounding planned land uses, grading anticipated within three finger canyons extending from McGonigle Canyon is regarded as a significant project impact to landforms.
- Due to the disturbance of steep slopes required and that any disturbance would be visible from the canyon floor and surrounding land uses, grading within two finger canyons extending from Deer Canyon allowed under Alternative 2 – Northern alignment is regarded as significant.

Findings: The Subarea Plan includes measures that, if implemented, would reduce landform alteration impacts, but not to below a level of significance. The Subarea Plan requires that future tentative maps incorporate sensitive grading techniques. However, due to the extent of grading anticipated within areas containing steep slopes, the visibility and distribution throughout the site, and the importance of affected finger and tributary canyons as important landforms, significant impacts to landforms anticipated in conjunction with the Master Plan are not considered to be fully mitigated through incorporation of policies requiring sensitive grading techniques.

No mitigation is available to reduce identified impacts to below significance. Adoption of the No Project Alternative, discussed in Section VIII of the EIR, would avoid the significant impact associated with landform alteration. The Environmentally Sensitive Alternative in Section VIII would lessen or avoid some, but not all, significant landform impacts.

Impact: The proposed project would result in significant fills in portions of the onsite canyons and significant encroachment into slopes exceeding 25%. These impacts to unique topographic features are not mitigable to below a level of significance.

Findings: Implementation of mitigation measures incorporated in the Subarea Plan (see pp. IV-E-17 of the EIR) would reduce impacts to unique topographic features, but not to below a level of significance. No mitigation is available to reduce the impact to onsite unique topographic features to below significance. Adoption of the No Project (Alternative A) or possibly the Development Under Existing Land Use Regulations (Alternative B), would avoid the significant impact to unique geologic and topographic features. The Environmentally Sensitive Alternative (Alternative D) would reduce but not avoid significant impacts.

Impact: The stand of mature eucalyptus trees located in the central portion of the site represents a distinctive visual feature. Anticipated removal of the eucalyptus trees is, therefore, regarded as a significant but mitigable impact of the project.

Findings: Implementation of the following mitigation measure would reduce the loss of the stand of eucalyptus trees to below a level of significance. Prior to Final Map approval, a landscaping concept plan for the high school site shall be prepared and submitted to the Director of Development Services for approval. The landscape concept plan shall identify new landscape features to be incorporated in accordance with the Subarea IV Plan Design Guidelines including planting of trees to replace eucalyptus trees lost as a result of development.

6. Cultural Resources

Impact: For the areas that could be surveyed, it was determined that future development would impact all 23 cultural resource sites within Torrey Highlands. Six of these sites have been tested and identified as not significant. All remaining sites and impacts are considered significant until testing has occurred on the remaining sites and a determination of significance by a qualified archaeologist is obtained. In addition, those areas that would not be surveyed are considered potentially significant, unmitigated impacts.

Findings: Implementation of the following measures will reduce impacts to below a level of significance. In conjunction with subsequent environmental review and prior to approval of grading permits for future development within Subarea IV, testing of all previously not tested onsite prehistoric and historic resources shall occur and a determination of significance ascertained. Sites determined to be significant by the testing program shall either be preserved or mitigated through research design and data recovery to the satisfaction of the Director of

Development Services. Figure IV-F-1 of the Final EIR indicates those areas of Subarea IV for which cultural resource field surveys will be required, and possible testing programs established depending on the results of the surveys.

7. Air Quality

Impact: Because of the non-attainment status of the SDAB, all future growth, including Subarea IV Alternative 1 or Alternative 2, would result in a cumulatively significant and unmitigable regional air quality impact. The proposed Torrey Highlands plans would develop 2,600 single-family units which exceeds the City's threshold for significance, thereby resulting in a significant cumulative, unmitigable air quality impact. Construction impacts relative to the generation of dust and other airborne particulates would be significant but mitigable.

Findings: Implementation of the following measures would reduce significant impacts associated with construction to below a level of significance, and would help reduce cumulative air quality traffic emissions, although not to below a level of significance. Only adoption of the No Project Alternative would avoid significant cumulative impacts to air quality resulting from auto emissions.

Future tentative maps shall incorporate non-vehicular travel modes of commuter access to the project to the satisfaction of the Director of Development Services. These measures shall include, but not be limited to the following:

- Incorporation of transit access consideration into project design in accordance with City of San Diego Transit-oriented Design Guidelines;
- Traffic flow improvements to reduce congestion;
- Inclusion of bike lanes for non-vehicular modes of transportation;
- Inclusion of transit system facilities outlined in Section 3.4 of the Subarea Plan; and
- Inclusion of trails and pedestrian oriented design features to reduce vehicular travel.

Prior to approval of grading permits for all future tentative maps, construction impact mitigation for all future projects within Subarea IV shall require development and implementation of a construction dust abatement management program. Dust abatement should consist of, but not be limited to, soil stabilizers, truck wash stations, and site watering to the satisfaction of the Director of Development Services Department. The dust abatement program shall achieve a minimum of 80 percent dust abatement. Non-compliance shall result in cessation of all construction activities until compliance can be assured. The dust abatement program shall be made a condition of the grading permit and monitored by the City.

8. Geology/Soils

Impact: There are no soil or geologic conditions which were observed or known to exist on the project site which would preclude development of the property or establishment of the

proposed open space areas. However, potentially significant geologic and soil conditions exist which would require mitigation, including landslides, expansive soils, alluvial soils, poorly consolidated soils, liquefaction potential and ground shaking due to an earthquake.

Findings: With implementation of the following measures, potential geological impacts would be mitigated to below a level of significance. Prior to issuance of grading permits for any proposed development on the project site, a project specific soils and geotechnical investigation shall be submitted and approved by the City Engineer. Grading and development plans shall be reviewed and approved by the City Engineer to determine compliance with the remedial grading measures identified in the project-specific geotechnical reports.

Impact: Project implementation requires disturbance of soils which have a severe erosion potential. This is considered a significant impact. Measures are incorporated which reduce significant impacts to a level below significance.

Findings: With implementation of the following measures, erosion impacts would be reduced to a level below significance. Best Management Practices of short-term erosion control measures, including sandbagging, temporary detention basins, and planting of disturbed slopes into grading plans for the proposed project shall be incorporated into future grading plans, to the satisfaction of the Director of the Development Services Department. In addition, prior to issuance of grading permits for any proposed development onsite, a project-specific landscaping plan shall be submitted to and approved by the Development Services Department. This plan will include measures to mitigate erosion and transport both during and immediately after construction (e.g., sediment traps or detention facilities), as well as landscaping for short- and long-term erosion control on manufactured slopes. A phased planting plan shall be prepared which requires installation of erosion-resistant ground cover within 30 days of completion of grading. The construction management plan required by Mitigation Measure IV-A.2 will require that construction be phased to minimize the number of graded slopes occurring at any one time in order to minimize erosion potential. Erosion control measures shall include those measures identified in Section IV-D, Hydrology/Water Quality, for erosion potential. These measures are identified under Mitigation Measures IV-D.1 and IV-D.4 and include geotextiles, slope drains, slope revegetation and silt fencing.

9. Agriculture/Natural Resources

Impact: The conversion of Prime Agricultural Land, Prime Farmland, and Farmland of Statewide Importance (a total of 203 and 205 acres under Alternatives 1 and 2, respectively) would represent a significant contribution to cumulative losses of agricultural lands. However, the project site has historically been marginally suitable for the production of regionally-important agricultural commodities. In addition, the soil characteristics onsite, availability of irrigation and topography are limiting factors to agricultural productivity. As a result, the direct impact of converting the site to non-agricultural uses would not be significant. The project is considered to be a cumulatively significant impact to the regional loss of prime agricultural lands.

Findings: No measures are available to reduce significant cumulative losses of agricultural land to a level below significance. Only adoption of the No Project/No Action Alternative would avoid this impact.

Impact: The loss of significant state-designated aggregate resources (MRZ-2) would be considered a significant long-term, direct impact of the proposed project. The loss of potentially significant aggregate resources (MRZ-3) would also be significant in that the project would preclude the future identification and use of such resources. The project's contribution to the cumulative loss of commercially viable aggregate deposits in the county that would supply future needs is considered cumulatively significant.

Findings: There is no project-specific mitigation which would mitigate the direct impact to potential commercially viable onsite aggregate. Implementation of an alternative land plan that would remove development from the MRZ-2 zone would partially mitigate the impact to onsite state-designated resources. Only implementation of the No Project Alternative would mitigate the direct impact to viable aggregate resources.

The incremental cumulative loss of state-designated aggregate resources onsite would not be mitigable. Only implementation of the No Project Alternative would avoid the cumulative impact to below a level of significance.

10. Paleontology

Impact: Project implementation would result in disturbance of areas which have moderate to high potential for paleontological resources. This is considered a significant direct and cumulative impact.

Findings: With implementation of the following measures, significant cumulative and direct impacts to paleontological resources would be mitigated to below a level of significance. Prior to issuance of a grading permit, a qualified paleontological monitor shall be retained to provide the following duties: monitoring of construction in high resource potential formation areas, salvaging, preparation of materials for deposit at a scientific institution that houses paleontological collections, and preparation of a report summarizing the results of the monitoring efforts.

11. Noise

Impact: Construction noise would be significant but mitigable to a level below significance. Onsite traffic-related noise would result in a significant noise impact to residential areas. Noise impacts at these areas would be fully mitigated. Allowed office uses adjacent to SR-56, Carmel Valley Road and Camino Ruiz associated with the Employment Center and industrial uses would also be exposed to potentially significant noise impacts. In addition, commercial, industrial and retail uses adjacent to SR-56 would experience significant traffic noise impacts, but they would be mitigable to below a level of significance. Offsite traffic-related direct noise impacts would be less than significant.

Findings: Implementation of the following mitigation measures would reduce noise impacts to below a level of significance. Specific mitigation measures cannot be determined at this time as more detailed information is required. However, the incorporation of the following general measures at the time specific detailed information for the project is available will reduce significant noise impacts to below a level of significance. These measures include locating residential usable open space areas beyond the 65 dB CNEL noise contour, appropriate building orientation to shield living areas from noise, incorporation of acoustical barriers to limit or reduce traffic noise, and preparation by a qualified acoustician of a project-specific acoustical report as a condition of issuance of building permits to ensure that appropriate mitigation measures are incorporated in project-level design and that acoustical levels to meet the City's interior and exterior noise criteria. Future grading permits will be conditioned to limit construction and maintenance timing as well as to require construction equipment mufflers, and location of construction staging areas away from existing development.

12. Public Facilities and Services

Impact: Based on the proposed development of 2,200 single-family residences and 400 multi-family residential units and Poway Unified School District student generation rates, the project would generate approximately 1,972 students. This would require the need for one elementary school and capacity in a middle school and high school in the Poway Unified School District. The Poway Unified School District is presently operating over capacity. Development within Subarea IV and the NCFUA is expected to occur over a 10 to 20-year period and impacts to individual schools would be dependent on development timing and location. If required by the Poway Unified School District, the project would provide one 11-acre elementary school site and a 70-acre high school site. Coupled with ongoing facilities planning at the District, it is anticipated that elementary and high school students generated by the project would be accommodated by existing and future planned facilities. Due to uncertainty regarding the proposed locations of future middle schools and that the existing Mesa Verde and Black Mountain middle schools are at or near capacity conditions, the impact of the project on middle schools is regarded as significant.

Findings: With implementation of the following measures, impacts to schools would be mitigated to below a level of significance. Prior to plan approval, a School Facilities Financing Plan for Torrey Highlands shall be completed which defines the financing and phasing necessary to assure adequate schools concurrent with demand. The responsibility of the project to provide funding for construction of proposed onsite elementary and high school facilities as well as offsite middle school facilities shall be determined prior to approval of the Subarea Plan.

Impact: It is anticipated that development of the project would result in interim significant impacts on library facilities in Rancho Penasquitos and Carmel Valley until sufficient population exists to warrant construction of library facilities within the NCFUA. A new branch library, which should provide service for project residents, would be required by the Framework Plan within Subarea III, when the NCFUA population reaches 18,000 to 20,000.

Findings: Implementation of the following measures would reduce impacts to library service to below a level of significance. As mentioned above, a new library is planned for Subarea III in the future. As mitigation for the impacts to public services, including libraries, a Public Facilities Financing Plan shall be completed which establishes fair share contributions for property within the NCFUA for regional facilities including community parks, libraries, fire stations and law enforcement facilities. The proposed project would contribute fair share funding toward construction of the library facility. Due to the similarity between timing and phasing of the proposed project and that anticipated by the Framework Plan, implementation of library facilities required by the Framework Plan would mitigate impacts of the proposed project on the ability of the City library system to provide current levels of service.

Impact: The proposed project would significantly impact fire services in the vicinity of the project. City fire stations would not be able to provide a first response within six minutes. The impact would be interim and exist until such time as proposed facilities are constructed within the NCFUA and able to provide a six-minute first response time.

Findings: Implementation of the following measure will mitigate the long-term impact related to fire services once a new fire station is constructed in the NCFUA, however, there would be a significant impact on fire services until that time. As mitigation for the impacts to public services, including fire service, a public facilities financing plan shall be completed which establishes fair share contributions for property within the NCFUA for regional facilities including community parks, libraries, fire stations and law enforcement facilities. The proposed project would contribute fair share funding toward construction of the new fire station. However, only adoption of the No Project Alternative would fully avoid the interim significant impact on fire services.

Impact: Future development within Subarea IV would result in increased demand for water supply and sewer capacity. Project impacts on the City's existing water supply and infrastructure system would be potentially significant, but mitigable. Future developments proposed within Subarea IV would be required to incorporate facilities determined to be necessary by the City as part of the 610/712 study. The impact of the project on sewage treatment facilities would be cumulatively significant if the Point Loma Treatment Plant is not expanded and/or reclamation plants are not constructed prior to buildout of the subarea. The Point Loma plant is currently operating near its design capacity and this project in combination with other future development within the service area would significantly impact the plant. Direct impacts on sewer service would not be significant in light of the small proportion of the project's contribution to regional sewage generation.

Findings: Implementation of the following measures would reduce water and sewer impacts to a level below significance. Prior to approval of Final Maps within Subarea IV, the City Engineering and Department shall review the water distribution plans to determine their consistency with water distribution plans approved for the NCFUA by the City. Development within the project shall comply with the construction timing and funding requirements

established in the approved Facilities Benefits Assessment for the Carmel Mountain Road Water Pipeline and the Carmel Valley Road Trunk Sewer. Development shall also pay its fair share of other onsite and offsite water and sewer facility improvements necessary to serve their respective developments, as identified in the City's Water Master Plan (currently in preparation), the Facilities Benefits Assessment, or during City review of proposed tentative maps.

Impact: The project would have a cumulatively significant impact on solid waste disposal in the region. Landfill space is currently in short supply and if new landfills are not approved, solid waste disposal will become difficult. This project in combination with other future projects in the region would be responsible for this impact. However, the project would not have a direct significant impact due to its small percentage of the overall waste stream and its required implementation of an Integrated Waste Management Plan.

Findings: Implementation of the following measure would reduce impacts from solid waste generation to below a level of significance. The Subarea Plan states that future projects within Subarea IV would be required to comply with City Council Policy 900-06 and the City's Source Reduction and Recycling Element (SRRE) regarding recycling. Measures consistent with the City's recycling program which are also required for future projects by the Subarea Plan, would mitigate impacts to a level below significance.

13. Water Conservation

Impact: Implementation of the proposed Subarea IV Plan under either Alternative 1 or 2 would have a significant cumulative impact on City water supplies. The Subarea Plan would allow for development of mostly undeveloped land that currently generates a water demand for 0.41 MGD and a sewage demand for 0.02 MGD. Land uses proposed by the project would require an estimated 2.3 to 2.4 MGD of water, and would generate approximately 0.93 MGD of sewage at buildout. Imported water supplies are limited and the additional demand from Subarea IV, in combination with other future developments, would represent a cumulatively significant impact on water supply.

Findings: Implementation of the following mitigation measures would reduce the project's impact on future water supplies; however, the cumulative impact would remain significant. As noted on pages IV-M-5 and 6 of the EIR, the Subarea Plan includes a number of mitigation measures associated with landscaping, grading and housing that would be required of future projects proposed within Subarea IV. These include measures to reduce irrigation runoff, use of drought tolerant plant materials, limitations on use of turf, use of low precipitation irrigation systems, use of moisture override systems to avoid sprinkling already wet areas, incorporation of low-flush toilets and faucets, incorporation of timers on sprinklers and provision of water reduction measures to new residents at the time of lot purchase. In addition, the project will be required to contribute toward fair share funding for provision of water and sewer facilities to serve future development in Subarea IV. However, a significant cumulative impact would remain. Only adoption of the No Project Alternative would avoid this significant impact of the project.

14. Safety

Impact: Located within the subject property is a 100-foot wide San Diego Gas and Electric Company (SDG&E) easement for power transmission lines that extends in a north/south direction along the western border of the project site. In accordance with CEQA Section 15145, the known information about electromagnetic effects has been summarized in the EIR. No definitive conclusion regarding the significance of locating development adjacent to transmission lines was reached because existing scientific data is inconclusive and potential impacts are therefore speculative.

Findings: As detailed in the EIR, studies of potential health effects related to EMF are inconclusive. Consequently, any conclusion regarding EMF and health risk would be speculative. In accordance with CEQA Section 15145, the known information about electromagnetic fields is summarized in this section, however, no conclusion has been reached. No significant impacts are identified. No mitigation is required, although it is recommended that the buffer guidelines in the Plan be followed and that any EMF presence be disclosed to future residents be made aware of

Impact: A potential for an impact on human health exists, based on the historic existence of malaria-carrying mosquitos in the area. The combined effects of weather and onsite topography periodically result in pools of standing water which can serve as breeding grounds for malaria-carrying mosquitos. This is a potentially significant but mitigable human health impact.

Findings: With implementation of the following measures, vector control safety impacts would be mitigated to below a level of significance. Prior to approval of future planned residential or commercial developments and tentative maps within Subarea IV, the City of San Diego Development Services Department shall review future tentative maps to ensure that vector control measures are incorporated into project planning in accordance with the San Diego County Department of Health. Generally, vector control measures include monitoring to ensure that detention basins and flood control channels are maintained in such a way that small flows are not blocked by sand, silt vegetation or debris. Any water conveyance and storage projects should include provisions for prompt attention to facility leakage or seepage to prevent water logged areas. More specific measures would be determined based on the design of future tentative maps and planned developments. In addition, any land uses proposing open bodies of water shall comply with standards established by the San Diego County Department of Health. Prior to approval of future planned developments and tentative maps within Subarea IV, the City Engineering and Development Department shall review the tentative maps to ensure that the County Health Department requirements regarding standing water have been incorporated into the project.

Impact: Hazardous soils, if discovered onsite, would present a significant, but mitigable impact on human health.

Findings: With implementation of the following measures, public health and safety impacts would be mitigated to below a level of significance. Prior to approval of any future tentative maps within this Subarea, a Phase I site assessment shall be conducted by a qualified hazardous waste consultant. Should contaminated soil be encountered, an industrial hygienist shall be consulted to determine specific health and safety measures for onsite construction workers. The assessment should include soil sampling and analysis for the presence and/or concentration of chlorinated herbicides and pesticides. Prior to approval of future final tentative maps, the City Development Services Department, EAS, shall review the maps to determine that the site assessment has been conducted and that measures have been incorporated into the map design to avoid potential hazards.

Impact: With adherence to the Brush Management Plan described on pages IV-N-7 and 8 of the EIR, implementation of future projects in accordance with the Subarea Plan is not anticipated to expose people or property to significant fire hazards. However, there will always be fire hazards in any neighborhood. Fire Department response times presently range from 7.8 minutes at Station 24 to 16.1 minutes from Station 35. These response times do not fall within the City of San Diego Fire Department desired response time of six minutes. However, the Framework Plan proposes three additional stations within the NCFUA which would enable the Fire Department to achieve a six-minute response time to all future NCFUA development. A short-term significant impact on fire service will exist until the facilities proposed for the NCFUA are constructed and provide a six-minute first response time.

Findings: With implementation of the following measures, fire hazards related to brush management control would be mitigated, however, an interim significant impact to fire service would continue to remain until a new fire station is constructed in the NCFUA. Detailed brush management plans submitted in association with future planned developments and tentative maps will comply with the City's *Landscape Technical Manual* and will be subject to review and approval by the Development Services Department EAS. If due to existing site conditions, a modified brush management plan is proposed, compliance with San Diego Municipal Code, Section 55.0889.0201 and approval by the Fire Chief would be required in addition to approval by the Development Services Department. Complete avoidance of interim significant fire response impacts would require adoption of the No Project Alternative.

B. Section 21081(b) Findings

Pursuant to Public Resources Code Section 21081(b), the decision-maker, having independently reviewed and considered the information contained in the Final EIR, the appendices and the record, finds that there are no changes or alterations to the project that are within the responsibility and jurisdiction of another public agency, which would avoid or substantially lessen the significant effects of the project.

C. Section 21081(c) Findings

The Final EIR discusses mitigation measures and a reasonable range of project alternatives that would substantially reduce or avoid identified significant impacts of the project. The range of project alternatives includes the No Project/No Action Alternative; Development Under Existing Land Use Regulations Alternative; Development Consistent with the Framework Plan Land Plan; Environmentally Sensitive Alternative; and Alternative Transportation Phasing Plan.

The Final EIR concludes that significant cumulative impacts to loss of agricultural and mineral resource lands, traffic impacts to three local intersections, cumulative traffic impacts at I-5 and I-15 during Phase 1 and Phase 2 of the proposed transportation phasing plan, cumulative impacts to hydrology/water quality, air quality, and landform alteration/visual quality would remain significant after implementation of the mitigation measures discussed in Section A of these Findings. The cumulative impacts to these issues would be avoided by implementation of the No Project/No Action Alternative. These significant cumulative impacts would be either avoided or reduced under the remaining alternatives as noted in the EIR and as discussed in these Findings. Pursuant to Public Resources Code §21081(c), the City Council, having independently reviewed and considered the information contained in the Final EIR, the appendices and the record, finds that the Final EIR describes all reasonable alternatives to the project and that specific economic, social or other considerations make infeasible the project alternatives identified in the Final EIR.

No Project/No Action Alternative:

Under this alternative, the site would be maintained in its existing condition and the existing uses would continue. The site would remain in the City's "Urban Reserve" designation and would not be shifted to the "Planned Urbanizing" area. This alternative assumes that no development would occur on the site. Existing agriculture-related operations onsite would continue. This alternative would preserve the existing sensitive resources onsite.

Impact: Existing onsite resources would not be lost under this alternative due to the lack of new development on the site. Significant direct impacts and the project's contribution to cumulative impacts would be avoided. The loss of significant agricultural soil and mineral extraction resources, impacts to the traffic circulation system, cumulative impacts to hydrology/water quality, incremental impacts to degradation of regional air quality, and all the significant, direct impacts to landform and visual quality would be avoided.

Findings: This alternative is infeasible for the following reasons. Retention of the project site in its existing state as primarily agricultural fields and open space would be inconsistent with the approved Framework Plan designations for this site. This alternative would not take advantage of this opportunity to contribute to dedicated open space consistent with the draft MSCP, nor would it provide the housing opportunities envisioned in the NCFUA Framework Plan, which includes core residential areas featuring a "fine-grained" texture with unique characteristics, varied types of housing, and a range of housing affordability. This alternative would not implement the employment opportunities created by the Subarea Plan. In addition, key local traffic routes established in the Framework Plan and Subarea Plan,

including access to SR-56, would not be implemented. Contribution of funds toward parks, libraries, fire stations and circulation element roads for the North City Future Urbanizing Area would be eliminated. The City of San Diego and other participating agencies would probably not realize their serious intent to put into use an Operation Center in the northern part of the City, since the land would not be appropriately zoned or approved for such a use. In addition, 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.

Although the opportunity to develop the project features planned for the Future Urbanizing Area could still be implemented at some point in the future if this alternative were adopted, the timing and certainty of this future opportunity are unknown. Adoption of the No Project Alternative would not achieve the goals of development of the Future Urbanizing Area as outlined in the NCFUA Framework Plan, at least not in the near future.

Development Under Existing Land Use Regulations Alternative:

Under this alternative the site would be developed in accordance with existing permitted activities and intensities established by the City of San Diego Progress Guide and General Plan, the zoning ordinance, and City Council Policy 600-29. Under this alternative, the subarea would remain designated as "Urban Reserve" and could be developed under different development alternatives as noted in the EIR (pp. VIII-3). The maximum development (worst case) scenario possible under this alternative involves development under PRD regulations, which would result in a development intensity with a gross density of one dwelling unit per four acres. Buildout of Subarea IV could result in a total of 199 dwelling units, or up to 249 units, if the project provides affordable units and receives a 25 percent density bonus. This assumes 794 acres of developable area, approximately 70 acres of ROW for SR-56 and preservation of about 270 acres in MSCP open space. Accessory uses such as commercial, office and recreational facilities servicing only project occupants would be included, as would roads required to serve development.

Impact: Impacts which are directly related to the number of housing units and the amount of commercial and office square-footage (e.g., population, traffic generation, air pollution, noise and demand for public services and utilities) would be proportionately reduced. Due to the substantial reduction in residential units, impacts to public services associated with the proposed project including those to schools, parks and solid waste generation would be reduced with implementation of this alternative. Impacts due to loss of agricultural lands and aggregate resources and impacts to hydrology/water quality would not be avoided. This alternative would preclude future implementation of the adopted NCFUA Framework Plan for subarea IV and this would be regarded as a significant land use impact.

Findings: This alternative is infeasible for the following reasons. Buildout of Subarea IV under this scenario would not conform with the intent of the NCFUA Framework Plan. The Framework Plan calls for the creation of a compact residential community with unique character, varied types of housing, and a range of housing affordability, supported by a mix of commercial, employment and public use

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opportunities. The Framework Plan also calls for future development in the NCFUA to promote the use of alternative modes of transportation, including pedestrian, equestrian, bicycle and mass transit opportunities. Buildout of Subarea IV 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. The preservation of the MSCP corridor may not be achieved by this alternative. The lower densities may not support commercial or office development, public uses and alternate transportation facilities. The lack of coordinated areawide planning based on urban design principles, such as those incorporated in the NCFUA Framework Plan could result in negative impacts on visual quality, although the low density nature of development and the decrease in total development of the area would more likely reflect the existing character of the area.

Failure to develop Subarea IV at densities approaching those assumed in the Framework Plan would also have an indirect impact on the remainder of the NCFUA. The lower fees that would be collected based on the greatly reduced number of dwelling units would have an adverse impact on provision of infrastructure (sewer, water, roadways), provision of school facilities, provision of offsite facilities such as libraries and fire stations, and lack of funding to implement needed traffic improvements.

The lower densities would also generate less property tax and sales tax revenues to the City and County such that developer funding may be insufficient to finance the construction of the Circulation Element roads in the Subarea or to provide for the construction of SR-56, and possibly force the City to postpone a direct east-west connection between I-15 and I-5. The lower level of developer funding may also be inadequate to support construction of the proposed trails through Subarea IV, or implementation of the MSCP open space preserve. This scenario would not preclude the eventual dedication, acquisition and improvement of these open spaces, but public funding might be required. It would also be more difficult to get property owners to agree to a "hard line preserve" concept. If such funding were not available, the extensive, improved open space areas and trails proposed in the Subarea IV Plan may never be implemented.

Development Consistent with the Framework Plan Land Plan Alternative

Under this alternative, Subarea IV would be built out in accordance with the uses and intensities established by the NCFUA Framework Plan. The Framework Plan allows 2,850 total dwelling units with a corresponding population of 7,410 persons, 40 acres of Local Mixed Use Center development, 32 acres of Service Commercial and 80 acres of Employment Center uses. The open space system totals 270 acres, which would be supplemented by ~190 acres transferred from Subarea V. The Framework Plan designates approximately 640 acres for very low and moderately low density residential development, making it the predominate urban use in Subarea IV. This alternative would also require approval of a Subarea Plan and voter approval of a phase shift to become a Planned Urbanizing Area prior to development. Dedication of open space areas as defined by the Framework Plan Environmental Tier would be required for future development.

The major differences between this alternative and the proposed project are that an 18-hole golf course would be included under this alternative, more acreage of residential development would occur, less

acreage would be planned for school sites, only one SR-56 interchange would be included, and commercial and industrial acreage would be less.

Impact: This alternative would result in similar impacts to those described in the NCFUA Framework Plan EIR. Significant impacts would result from development of Subarea IV consistent with Framework Plan designations. Land use impacts resulting from inconsistency with the General Plan Policies include development of urban reserve areas while adequate capacity currently exists in the City, and potential incompatibility with existing and planned land uses and roadway alignments. Transportation/traffic impacts would be significant with increased average daily traffic within and surrounding the NCFUA. Other impacts from this alternative that were also identified in the Framework Plan EIR include significant impacts relating to biological resources, hydrology and water quality, landform/visual quality, archeological/historical resources, paleontological resources, air quality, geologic and soils hazards, noise, conversion of agricultural lands, preclusion of future extraction of sand and gravel, water supply distribution and conservation, short-term impacts on schools and cumulative impacts to police, fire, libraries and other public services.

Compared to the proposed project, buildout of Subarea IV under the Framework Plan designations would result in similar impacts including but not limited to land use incompatibilities, potential direct or indirect impacts to biological resources, landform alteration, change in visual character, potential impacts to cultural and paleontological resources, water quality impacts, increase in storm water runoff, erosion, loss of agricultural and mineral resources and public safety. Significant cumulative impacts as identified in Section VI of this EIR would be somewhat reduced under the Framework Plan Alternative because of the reduction of commercial and industrial acreage. The total number of residential units under this alternative would be 2,850, which is 157 units (5.6 %) more than the proposed Torrey Highlands and approved Fairbanks Highlands projects combined, which offsets somewhat the traffic related impacts caused by the increased commercial/industrial acreage under the proposed Torrey Highlands plan. Overall development in this alternative is of the same magnitude as the proposed project and the cumulative impacts would be substantially the same.

The Framework Plan land use map includes only one interchange with SR-56 within Subarea IV. This would result in potential increased traffic impacts associated with circulation of Joint Operations Center vehicles through the Subarea and onto SR-56.

Findings: This alternative is infeasible for the following reasons. As noted in the EIR and the following discussion, there have been significant changes both on and off the site that make a land use plan that follows the Framework Plan less practicable. First, the golf course, which was included in the Framework Plan for this subarea, is not feasible because a significant portion of the area where the golf course was to be developed has been removed from phase shift consideration (the 386-acre project known as Fairbanks Highlands). Given the significant acreages allocated to other non-revenue contributing land uses such as the four school sites, the JOC, the MSCP corridor and other open space uses, the acres consumed by the circulation roads and SR-56, plus the reduction of the 386 acres of developable area, the addition of about 150 acres required for a golf course would significantly densify the project (because of the need to accommodate all these uses plus enough residential development to generate

funding for capital improvements) and require development in areas that would compromise the MSCP corridor and other open space areas. In addition, it is noted that there are two golf courses planned for the nearby Black Mountain Ranch project to the north.

The Framework Plan proposal to designate 40 acres for a City Operations Center is no longer acceptable because the City has requested that it be a Joint Operations Center, thus necessitating the larger acreage and a second interchange with SR-56 (to accommodate operation center traffic). Failure to accommodate the City's request for the Joint Operations Center and the necessary interchange may undermine the City's ability to satisfy its requirements in wanting to locate an Operations Center in the northern part of the City, thus further aggravating the mounting fiscal pressures of providing City services for the northern part of the City from Operations Centers located several miles distant from this area. The interchange is required to mitigate the impact the substantial surface traffic created by the industrial vehicles serving the JOC could have on residential and commercial lands uses in the subarea. Although the HOC could conceivably be located elsewhere, the availability of a large enough parcel conveniently located near freeway access may be difficult to secure.

The Framework Plan land uses have also been revised to relocate 60,000 square feet of LMXU use from the northern part of the Subarea along Carmel Valley road to the central LMXU, which is necessitated because of the subtraction of residential density north of Carmel Valley Road. This additional concentration of commercial and residential density around the central LMXU (further south) enhances the function of the neo-traditional, compact neighborhood concept. Failure to relocate the commercial square footage to the central LMXU would not establish the necessary concentration of residential and commercial land uses for the LMXU to serve the subarea population. This, in turn, would create greater traffic and air quality impacts in the adjoining communities, as residents would travel outside the subarea to exercise shopping, recreational and other opportunities.

Environmentally Sensitive Alternative

The intent of this alternative is to avoid the significant impacts to landform alteration, visual quality, and biological resources. Under this alternative, the intensity and types of development would be reduced from that of the proposed project. Five development areas ranging from 37 to 192 acres where development could occur with minimal impacts to steep slopes (>25%) and sensitive biological resources are identified.

The intensity of uses proposed for the Central neighborhood and the Subregional Center would be substantially reduced under this alternative. Depending on market demand for a product, future development could involve implementation of one type of use at the expense of another. For example, 200 acres of Employment Center and JOC uses could be built instead of residential and associated school uses. Regardless of the types of uses chosen, Camino Ruiz and Carmel Valley Road would be extended through the site to provide access. Circulation and access requirements would further reduce the development area. The SR-56 alignment alternative chosen by Caltrans would affect the amount of developable acreage available under this alternative. Implementation of the Northern Alignment would further reduce the development acreage.

Impact: Under this alternative, landform impacts identified for the project would be reduced to below a level of significance. Development would be generally limited to the level mesa areas. By using only the five development areas, constructed manufactured slopes on the knoll and tributary in the northern portion and in the finger canyons along McGonigle and Deer Canyons would be avoided. Approximately 10 acres of sensitive slopes (>25% grade), or 7% of the steep slopes in the Subarea, would be disturbed. This would reduce landform impacts to below a level of significance.

The Proposed JOC and Employment Center uses would be 1,000 feet from the base of Deer Canyon and development would be pulled back from McGonigle and Deer Canyons, thus avoiding impacts to views of the site from surrounding land uses. Development intensity in the central portion of the site would be substantially reduced and would preserve a larger portion of the onsite canyons compared to the proposed project. However, development would still be visible to surrounding land uses and the significant visual character change associated with the proposed project would not be avoided under this alternative.

Direct impacts to sensitive biological resources would be reduced to below a level of significance with ~11 acres (3%) of onsite sensitive vegetation, four individual sensitive plants, and two locations of San Diego black-tailed jack rabbits affected. California gnatcatcher sites would not be affected, and vernal pools would be preserved. The connected areas of undisturbed open space for this alternative would cover a greater area than the proposed MSCP Corridor under the proposed project and the Framework Plan.

This alternative would also reduce traffic impacts because the number of residential units, and the acreages of commercial and industrial square footage would be reduced. If phased appropriately, significant unmitigated cumulative traffic impacts associated with the proposed plan would be mitigated.

Implementation of this alternative would not be consistent with the goals of the project to develop in accordance with the Framework Plan. Although the exact land uses within each development area in the alternative cannot be determined, it is anticipated that the acreages of all proposed land uses would either be reduced or eliminated.

Under this alternative, the EIR identifies that there would be five separate development areas ranging in size from 37 to 192 acres, for a total of 405 developable acres. Assuming that the northerly alignment for SR-56 was adopted, the acreage available for development would be even less. This estimate of 405 developable acres is less than half of the developable acreage under the proposed plan. The available acreage, the configuration of the developable bubbles, and the relatively large acreage of other required public facilities would make provision of the proposed land uses difficult. The Framework Plan included 876 acres of residential use, 80 acres of employment center, 32 acres of service commercial, 40 acres of LMXU and 30 acres of schools. Since the adoption of the Framework Plan, the required acreage of schools has climbed to 123 acres, the joint operations center is 57 acres, and 10 acres of parks are now required. The environmentally preferred alternative would not allow for development of all required public facilities and a balanced mix of residential and employment uses.

The reduction in the intensity of uses proposed as a part of this alternative could create a significant land use impact to the extent that development under this alternative would not be consistent with the intensities anticipated by the Framework Plan.

Findings: This alternative is infeasible for the following reasons. This alternative would provide less than half the developable acreage than under either of the two proposed Subarea IV plans evaluated in the EIR. The available acreage and the configuration of the developable bubbles would make provision of the land uses envisioned in the Framework Plan infeasible. As noted above, the Framework Plan envisioned 876 acres of residential, 80 acres of employment center, 32 acres of service commercial, 40 acres of LMXU and 30 acres of schools (total of 1,058 acres). Since the adoption of the Framework Plan, the required acreage of schools has increased to 123 acres, the Joint Operations Center is up to 57 acres, and 10 acres of parks not included in the Framework Plan land uses is now required. This alternative would not allow for development of all required public facilities and a balanced mix of residential and employment uses.

The reduction in the intensity of uses proposed as a part of this alternative could create a significant land use impact to the extent that development under this alternative would not implement the adopted Framework Plan. This alternative would not be consistent with the approved Framework Plan designation for this area which contemplates a compact residential community with unique characteristics, varied types of housing, and a range of housing affordability. In addition, development would not necessarily be "compact" as defined in the Framework Plan, to encourage alternative modes of transportation, including pedestrian, bicycle and mass transit opportunities.

The proposed plan includes substantial acreages of public uses that are non-revenue contributing land uses, including the four school sites, the Joint Operations Center, MSCP corridor and other open spaces, two neighborhood park sites, and area required for circulation roads and SR-56. Under this alternative, assuming a lower overall number of residential units, there would be fewer parks and schools required. Even so, this alternative would make the provision of proposed public facilities infeasible because there would not be enough acreage of revenue-providing uses to fund these uses and contribute toward provision of all necessary public services. Failure to develop Subarea IV at densities approaching those assumed in the proposed project would also have an indirect impact on the remainder of the NCFUA. The lower fees that would be collected based on the greatly reduced number of dwelling units would have an adverse impact on provision of infrastructure (sewer, water, roadways), provision of school facilities, provision of offsite facilities such as libraries and fire stations, and lack of funding to implement needed traffic improvements. Development-related funding under this alternative may be insufficient to finance the construction of the Circulation Element roads in the Subarea or to provide for the construction of SR-56, and possibly force the City to postpone a direct east-west connection between I-15 and I-5. Reduced development-related funds would be available to support construction of the proposed trails through Subarea IV, or dedication of the MSCP open space preserve. This scenario would not preclude the eventual dedication, acquisition and improvement of these open spaces, but public funding might be required. If such funding were not available, the extensive, improved open-space areas and trails proposed in the Subarea IV Plan may never be implemented.

Alternative Transportation Phasing Plan:

This alternative involves adoption of a revised transportation phasing plan for the project that would mitigate the significant cumulative traffic impacts at the I-15/Ted Williams Parkway and I-5/SR-56 Interchanges that would occur during Phases One and Two of the proposed phasing plan outlined in Section IV-B of the EIR. This alternative phasing plan is the same as that proposed by the applicant except that Phase One development would be limited to 15,000 ADT, instead of the 27,000 ADT proposed by the applicant. The 15,000 ADT allowed in Phase 1 under this alternative would consist of 5,000 residential trips, 8,000 commercial trips, and 2,000 joint operations trips. In addition, prior to development in Phase Two, the following facilities would need to be in place: I-5/Carmel Valley Northbound ramp connectors; I-5/SR-56 Dual Freeway; Ted Williams Parkway/I-15 east to north loop ramps, east to south right turn lane; and I-15/Ted Williams southbound on-ramp. The proposed phasing plan allows for either of the first two improvements noted above to be in place during Phase Two, and it doesn't require the remaining three improvements noted above until Phase Three.

Impact: Implementation of this alternative would delay the buildout of Torrey Highlands beyond 15,000 ADT until the major freeway improvements are in place, which is not projected in the near future. This alternative would avoid the cumulative significant impact the proposed project would have on regional traffic facilities at I-5 and I-15. This reduction in development would also reduce (in the short term) the cumulative impacts related to provision of public services and schools. Other impacts related to traffic generation such as noise and air quality would also be reduced in the short term.

Findings: This alternative is infeasible for the following reasons. The cumulative traffic impacts that would be mitigated by this alternative are regional impacts that require regional solutions. The phasing proposed under this alternative would preclude development until these regional facilities are in place. There is no guarantee as to when these facilities would be in place, which could render development of the majority of Subarea IV infeasible. As noted in the EIR analysis, the percent contribution by the project toward this impact ranges from 2.8 % to 3.9 %. This impact would exist only between the time traffic generation exceeds 65,000 ADT until the regional traffic improvements are in place. The requirement to ensure that the regional traffic improvements are in place prior to approval of the next phase of development would likely result in denying indefinitely the development of the subarea.

This alternative is further found to be infeasible because it proposes to halt any development and other land use activity within Torrey Highlands after the construction of less than 20 percent (500 units) of the total anticipated residential development (2,600 units) and less than 17 percent of the total anticipated commercial development (63 acres). The 15,000 ADT threshold is anticipated to apply some time in the 12 month period between January 1, 2002 and January 1, 2003. In effect, all subsequent land use activity would be halted until funding is identified and assured for completion of the proposed dual freeway system approximately 8 miles to the west, i.e. the widening of I-5/I-805 at the west end of SR-56.

This threshold creates, at minimum, two major obstacles for Torrey Highlands. First, the continued development of the community would be directly tied to a transportation improvement which has no

assurance of funding - it has been removed from the STIP funds programmed through the year 2003. Second, this threshold is predicated on a circumstance or event which is outside the list of projects funded directly by Subarea IV development impact fees (DIF).

Both obstacles noted above exacerbate the same problem: some of the most important Subarea IV projects which are required for completion in the early phases of development will necessitate bonds to finance their construction. The issuance of these bonds is contingent upon subsequent revenue generated by development. Any prolonged interruption of the ability to service the debt created by these bonds causes reluctance on the part of bond market underwriters to issue the bonds. The imposition of this off-site transportation improvements as an absolute project requirement, over which Subarea IV has no control and whose timing resolution is unknown, is likely to undermine the subarea's ability to issue the requisite bonds to fund necessary improvements. It will also inhibit, and may in fact prevent, subdividers from obtaining financing for their projects and improvements they must fund.

**STATEMENT OF OVERRIDING CONSIDERATIONS
CEQA GUIDELINES SECTION 15093**

The California Environmental Quality Act (CEQA) and the State CEQA Guidelines provide:

- (a) CEQA requires the decision-maker to balance the benefits of a proposed project against its unavoidable environmental risks in determining whether to approve the project. If the benefits of a proposed project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered acceptable.
- (b) Where the decision of the public agency allows the occurrence of significant effects which are identified in the Final EIR but are not at least substantially mitigated, the agency shall state in writing the specific reasons to support its action based on the Final EIR and/or other information in the record. This statement may be necessary if the agency also makes a finding under Section 15091(a)(2) or (a)(3).
- (c) If an agency makes a statement of overriding considerations, the statement should be included in the record of the project approval and should be mentioned in the Notice of Determination (CEQA Guidelines Section 15093).

The City, pursuant to the CEQA Guidelines, after balancing the effects of the proposed project against the unavoidable cumulative impacts to loss of agricultural lands, visual impacts associated with views from Carmel Valley Road and SR-56, and water quality which remain significant notwithstanding the mitigation measures and alternatives described above, determines that the remaining environmental effects are acceptable due to the following specific considerations:

- 1. The project (Alternative 1 or 2) implements the land use designations of the adopted Framework Plan and provides for a mix of land uses that provides housing opportunities, jobs, and needed public facilities for the North City region. The proposed plan encourages the use of alternative modes of transportation through the provision of transit facilities and the inclusion of a bicycle and pedestrian network, and it provides commercial and civic facilities in the mixed use centers to meet the daily needs of area residents;
- 2. The project provides affordable housing consistent with the goals of the NCFUA Framework Plan;
- 3. The project provides approximately 253 – 270 acres of MSCP open space and three open space amenity areas that ensure long-term sensitive resource protection and public use of open space, as well as a wildlife rescue facility;
- 4. The project provides trail linkages to future planned development, the MSCP open space and other areas within the NCFUA which expands recreational opportunities within the region;

5. The project would provide through future development, substantial contributions toward the construction of public facilities and roadways in Subarea IV that serve neighboring subareas. The draft Public Facilities Financing Plan and Development Impact Fee Program notes the following projects and Subarea IV contributions:
- Approximately \$3,600,000 in developer provided improvements (as part of the subdivision process) and \$26,200,000 in Development Impact Fees (DIF) would be provided for improvements to SR-56, Camino Ruiz, Carmel Valley Road, Carmel Mountain Road, Del Mar Heights Road, a pedestrian crossing over Camino Ruiz, a wildlife crossing below Carmel Valley Road, a park-n-ride facility, and an interchange for the JOC.
 - Approximately \$6,860,000 in Development Impact Fees would be provided to fund construction of two new neighborhood parks, contributions to a community park in Black Mountain Ranch, and open space acquisition and trail construction in the MSCP corridor.
 - Approximately \$1,310,000 in DIF fees would be provided to help fund a new library in the NCFUA and \$400,000 would be provided for upgrades to the Carmel Valley Interceptor Sewer.
6. The project would generate new temporary construction related jobs that would enhance the economic base of the region. These construction jobs are needed in the region due to the recent downturn in construction activities and corresponding increase in unemployment. Assuming full buildout, it is anticipated that an average of 375 construction jobs per year for a period of 15 years would be generated.
7. The project would provide locations for a 70-acre high school, a 11-acre elementary school, two neighborhood parks totaling 10 acres, and a 57-acre Joint Operations Center.
8. At full buildout, the project would generate an estimated 1,750 to 2,000 permanent jobs.
9. The City would receive additional property taxes due to the improved land value associated with the project. Based on the assessed value of the land with implementation of the proposed improvements and a standard tax rate of 1.25% (1% property tax =+ 0.25 for fees and assessments, i.e. sewer districts, etc.), total property taxes for the 1,134-acre site would be at least \$10 million. 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.

For these reasons, on balance, the City of San Diego finds that the above considerations resulting from the project serve to override and outweigh the project's unavoidable significant environmental effects and thus, adverse environmental effects are considered acceptable.

MITIGATION MONITORING AND REPORTING PROGRAM
TORREY HIGHLANDS SUBAREA IV
DEP NO. 93-0152

This Mitigation Monitoring and Reporting Program is designed to ensure compliance with Public Resources Code Section 21081.6 during implementation of mitigation measures. This program identifies at a minimum: the department responsible for the monitoring, what is to be monitored, how the monitoring shall be accomplished, the monitoring and reporting schedule, and completion requirements. A record of the Mitigation Monitoring and Reporting Program will be maintained at the offices of the Land Development Review Division, 1222 First Avenue, Fifth Floor, San Diego, CA 92101. All mitigation measures contained in the EIR (DEP NO. 93-0152) shall be made conditions of the project as may be further described below.

The above mitigation monitoring and reporting program will require additional fees and/or deposits to be collected prior to the issuance of building permits, certificates of occupancy and/or final maps to ensure the successful completion of the monitoring program.

A. LAND USE

The following mitigation measures reduce significant impacts associated with provision of affordable housing and construction-related land use conflicts to below a level of significance:

Mitigation Measure IV-A.1: Prior to approval of future discretionary tentative maps and/or permits, the applicant shall demonstrate to the satisfaction of the Director of the Development Services Department that the project meets the affordable housing requirements as outlined in the Subarea Plan. The total number of units required for the Tentative Map or permit shall be identified, and these units shall be permanently designated as affordable housing for low and moderate incomes as defined by Section 7 of the Framework Plan.

Mitigation Measure IV-A.2: Prior to construction of specific development projects within Subarea IV, the developer shall provide the City Development Services Department with a construction management plan. The plan shall address traffic management of construction vehicles, siting of construction trailers and equipment staging areas, construction employee parking, maintenance of access to homes and businesses, dust and noise control, and construction phasing through incorporation of measures identified in Section IV-D, Hydrology/Water Quality; and IV-G, Air Quality, IV-H, Geology/Soils, and IV-K, Noise, associated with preparation of a storm water pollution prevention plan, erosion control, dust abatement, and specified construction times. Construction should be phased to minimize the amount of graded slopes occurring at any one time in order to minimize potential erosion impacts (Mitigation Measure IV-H.3).

B. TRANSPORTATION/TRAFFIC CIRCULATION

Mitigation measures described below include a traffic phasing plan and specific improvements that would mitigate significant impacts for local street segments and intersections to the extent feasible, although some non-freeway traffic facilities cannot be mitigated to a level where the facilities operate at acceptable levels of service. During Phases 1 and 2 of the proposed phasing plan, there would continue to be significant, unmitigated cumulative impacts on freeway facilities attributable to the project that cannot be mitigated to acceptable levels under the proposed phasing plan. Mitigation of significant cumulative impacts to these facilities would require adoption of a project alternative that provides a different phasing plan.

Mitigation Measure IV-B.1: Subsequent development proposals within the project site shall be conditioned to assure and/or provide improvements to the signals, intersections, internal roads, Interchanges and other improvements as appropriate, based on the level of project impact to these facilities. These improvements are listed in *Table 1*.

TABLE 1. REGIONAL ROAD IMPROVEMENTS PROVIDED BY TORREY HIGHLANDS DEVELOPMENT

IMPROVEMENT NO	FACILITY	LOCATION	DESCRIPTION
1	Camino Ruiz	Carmel Valley Road to Carmel Mountain Road	Construct 6-lane major road
2	Camino Ruiz	Street "A" to commer. access S/O SR-56	Construct 6-lane primary
3	Camino Ruiz	@ Carmel Valley	Construct traffic signal plus intersection improvements.
4	Camino Ruiz	@ Street "B"	Construct traffic signal
5	Camino Ruiz	@ Street "A"	Construct traffic signal
6	Camino Ruiz	@ SR-56 WB Ramps	Construct traffic signal
7	Camino Ruiz	@ SR-56 EB Ramps	Construct traffic signal
8	Camino Ruiz	@ SR-56	Construct interchange
9	Camino Ruiz	@ Project commer. access S/O SR-56	Construct traffic signal
10	Camino Ruiz	@ Carmel Mountain Road	Construct traffic signal
11	Camino Ruiz	Carmel Mountain to Domouse	Construct 4-lane major
12	Carmel Mtn. Road	Carmel Mtn. Rd. to Camino Ruiz	Construct 2-lane bridge and roadway
13	Carmel Mtn. Road	@ Project commer. access	Construct traffic signal
14	Carmel Valley Rd/DMH Rd.	C.V. community line to Camino Santa Fe	Construct 5-lane major
15	Carmel Valley Road	@ LMXU Driveway	Construct traffic signal
16	Carmel Valley Road	Camino Santa Fe to Black Mountain Road	Construct 4-lane major
17	Carmel Valley Road	@ Rancho Santa Fe Farms Road	Construct traffic signal
18	Del Mar Heights Road	@ I-5	West to NB I-5 right turn lane, or fund studies.
19	Third Interchange	"A" Street & SR-56	Construct roadway and interchange

Mitigation Measure IV-B.2: The Torrey Highlands project development intensity will be phased to provide transportation facilities concurrently with the need for these improvements. Many key transportation facilities are of a regional nature to be funded by others, while other developments require funding from the project. Five development thresholds have been developed to ensure that the project is phased concurrently with the provision of key transportation facilities. The Engineering Department shall review future Tentative Maps for compliance with the phasing plan outlined above and in *Table 2*.

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TABLE 2. TORREY HIGHLANDS TRANSPORTATION PHASING PLAN

Improvement Number	Facility	Location	REQUIRED IMPROVEMENT	
			Description	Responsible Party
Phase One: Expressway with Interchange – Prior to any development in Torrey Highlands, not to exceed 27,000 ADT (10,000 Res., 17,000 Retail/Commercial/JOC)				
1	SR-56	Black Mtn. Rd. to Carmel Country Rd.	Extend SR-56 as a 4-lane expressway	Others
2	Camino Ruiz	Carmel Valley Rd. to SR-56	Construct 2 lanes of an ultimate 6-lane major road	BMR (e)
4	Camino Ruiz	@ Carmel Valley	Construct traffic signal plus intersection improvements	BMR (b)
5	Camino Ruiz	SR-56 to Carmel Mtn. Rd.	Construct 2-lane street	T.H.
6	Carmel Valley Road	Evergreen Nursery to Camino Ruiz	Construct 2-lane collector street	BMR (e)/F.H.
7a	Carmel Valley Road	Evergreen Nursery to Del Mar Heights Road	Provide striping, signaling, and widening improvements as required by City Engineer	BMR (b)
7b	Carmel Valley Road	Camino Ruiz to Black Mountain Road	Construct 2-lane major	BMR (b)
8	Carmel Valley Road	@ Rancho Santa Fe Farms Road	Construct traffic signal	BMR (b)
9	Del Mar Heights Road	Carmel Valley Road to Lansdale East	Provide striping, signaling, and widening improvements as required by City Engineer	T.H. or BMR (b) if shifted
10	Del Mar Heights Road	Carmel Canyon to Lansdale East	Construct roadway	Others
11	Del Mar Heights Road	Lansdale East to C.V. Community Line	Construct roadway	Others
12	Black Mountain Road	Existing terminus to Carmel Valley Road	Construct roadway	BMR (a)
17	Del Mar Heights Road	@ I-5	West to NB I-5 right-turn lane, or fund studies	T.H.
19	Camino Ruiz	@ SR-56	Construct interchange (1/2 of ultimate)	T.H.
22a	Camino Ruiz	Carmel Mountain to Doormouse	Construct 2-lane roadway	T.H./Others (c)
Phase Two: Prior to Exceeding 27,000 ADT				
18	Via de la Valle	St. Andres to El Camino Real	Improve to 4 lanes	Others (c)
19	Camino Ruiz	@ SR-56	Construct full interchange	T.H.
20*	I-5	Carmel Valley Road	Construct NB connectors	Others (c)
21*	I-5	@ SR-56	Dual freeway	Others (c)
22b	Camino Ruiz	Carmel Valley Road to SR-56	Improve to 6-lane major	T.H. (d)
25a	Carmel Valley Road	Camino Ruiz to project boundary (onsite)	Improve to 4 lanes	T.H.
Phase Three: Prior to Exceeding 35,000 ADT (15,000 Res., 20,000 Retail/Commercial, Employment/JOC)				
20	I-5	Carmel Valley Road	Construct NB connectors	Others (c)
21	I-5	@ SR-55	Dual freeway	Others (c)
23	Carmel Mountain Road	Carmel Mtn. Rd. to Camino Ruiz	Construct 2-lane bridge and roadway	T.H./Others (c)
24	El Camino Real	Half Mile Dr. to Via de la Valle	Improve to a 4-lane major street	Others (c)
25b	Carmel Valley Rd/DMH Rd.	C.V. community line to Black Mtn. Rd.	Improve to 4 lanes	T.H./Others (c)
26	Ted Williams Parkway	@ I-15	East to north loop ramp, east to south right-turn lane	Others (c)
27	I-15	@ Ted Williams Parkway	Add SB on-ramp lane	Others (c)
28	SR-56	One mile east and west of interchange	Improve to 6 lanes	Others (c)
29	Camino Ruiz	SR-56 to Carmel Mountain Road	Improve to 6 lanes	T.H.
Phase Four: Prior to Exceeding 50,000 ADT				
23b	Carmel Mountain Road	Carmel Mtn. Rd. to Camino Ruiz	Widen to 4-lane major	Others (c)
25c	Carmel Valley Road	Camino Ruiz to Black Mountain Road	Improve to 4 lanes	T.H./Others (c)
30	El Camino Real	@ Carmel Valley Road	Improve intersections	Others (c)
31	I-15	SR-56 to Escondido	HOV lane extension	Others (c)
32	I-15	Carmel Mtn. Rd. to Camino del Norte	NB and SB truck climbing lanes	Others (c)
33	Right-of-way	Third Interchange/Street Network	Provide right-of-way	T.H.
34	Camino Ruiz	Carmel Mtn. to Doormouse	Improve to 4 lanes	T.H./Others (c)
Phase Five: Prior to Exceeding 60,000 ADT				
35	SR-56	I-5 to I-15	Full freeway	Others (c)
36	Third Interchange	"A" Street & SR-56	Construct roadway and interchange	T.H.
37	Carmel Mountain Road	@ I-5	Construct interchange	Others (c)

Note: "Responsible Party" shown in table are preliminary. A process of determining exact fair-share contributions to needed improvements shall be completed during the development phase.

- (a) BMR shall provide improvements and seek reimbursement from others as appropriate.
 - (b) If BMR project does not precede Torrey Highlands (T.H.), then T.H. seeks reimbursement.
 - (c) Funding shall be provided by Transnet/FBA/City/Others as appropriate.
 - (d) BMR is required to fund a portion of this improvement.
 - (e) If BMR project does not precede Torrey Highlands (T.H.), then T.H. is responsible for improvement.
- Dual freeway or NB I-5 connectors must be in place.
- BMR - Black Mountain Ranch T.H. - Torrey Highlands F.H. - Fairbanks Highlands

C. BIOLOGICAL RESOURCES

Implementation of the proposed plan would result in significant direct and indirect impacts on a number of sensitive plant and animal species, impacts to wildlife corridors and movement, and cumulative biological impacts. The following measures would mitigate impacts to below a level of significance:

Mitigation Measure IV-C.1: The mitigation measures will reduce all project impacts to all biological resources onsite to below the level of significance. The following are general mitigation guidelines. Please see Appendix C – Biological Resources (Appendix D – Conceptual Mitigation Plan) for additional information. Proposed mitigation measures are based on the California Environmental Quality Act (CEQA), Resource Protection Ordinance (RPO), and National Communities Conservation Planning (NCCP) criteria, and are intended to be consistent with the City of San Diego's Multiple Species Conservation Plan (MSCP) Subarea Plan when it is adopted. The Draft MSCP currently is being developed; draft policies currently being considered as part of the MSCP have been addressed where appropriate.

Impacts of development with the Subarea will be mitigated on two levels. Initially, the Plan will refine the boundary and set aside the proposed MSCP preserve which will be similar to the Environmental Tier as defined in the NCFUA Framework Plan. Ultimately, actual losses of sensitive biological resources associated with future development projects within Torrey Highlands will be mitigated through a program consisting of a combination of the following compensation options: onsite preservation, onsite restoration, payment of fees (for habitat acquisition), and offsite preservation.

The acquisition and preservation of the MSCP Corridor will occur utilizing the following two measures. First, once if the City Council has approved placement of the proposed Torrey Highlands Phase Shift on the ballot, property owners will make an Irrevocable Offer to Dedicate an open space easement on all lands within the proposed MSCP preserve to the City of San Diego to become accepted by the City after a successful phase shift vote. The second measure will be implementation of a strategy for the acquisition of the preserve utilizing the menu of options outlined below.

The Torrey Highlands resource-based open space system, which also comprises the proposed (the contribution to the MSCP preserve onsite) consists of 253 acres for Alternative 1 and 270 acres for Alternative 2. The preserve area varies in width from 650-900 feet to 1,400 feet. Approximately 87 percent of the preserve area is in excess of 1,000 feet in width. Although the NCFUA Framework Plan established a minimum corridor width of 660 feet, the development of the MSCP by while the resource agencies, local agencies and interested parties and City staff have recommended a focused on 1,000-foot corridor widths as part of the MSCP to facilitate wildlife movement along regional corridors.

Open space amenity areas will preserve major portions of the riparian habitat that occurs onsite. Fifty-foot biological buffers setbacks and 50-foot planning buffers transitional areas will be established adjacent to the preserved riparian habitat. The biological buffers setback will be left in a native state, while the planning buffers transitional area may include fuel modification (brush management) zones, minor grading, and passive recreational uses.

Individual project-level mitigation will be necessary to compensate for losses that would result from subsequent development within the Subarea. It is likely that property owners of areas dedicated as part of the preserve will be compensated for by other property owners who need mitigation lands.

- The compensation obligation will be based on projected impacts on biological resources as they currently exist within the project area rather than at the time when direct impacts would occur. This will provide the landowners with assurances that the mitigation requirements can be met and will not change. When a future project (at the tentative map stage) is processed, the City will determine, as part of the environmental review process, if a new biological survey is required. It is anticipated that mitigation ratios for each project will be based on the framework established in the Subarea Plan. However, new biological information or new adopted ordinances or plans in place at the time of the future project, including the MSCP, may revise the mitigation ratios and strategy.
- The open space area within Torrey Highlands will serve as the primary focus mitigation area (for impacts to resources within Torrey Highlands) bank, although landowners would be allowed to mitigate elsewhere, and landowners within the MSCP preserve would be allowed to sell mitigation credits to projects outside of Torrey Highlands.
- Impacts to Diegan coastal sage scrub should be mitigated at a minimum ratio of 1:1 by area. Most of this habitat onsite is fragmented and/or disturbed; hence, it is of lower value.
- Impacts to scrub oak chaparral should be mitigated at a minimum ratio of 2:1 by area. Although considered a sensitive habitat, scrub oak chaparral is widespread in the subregion and supports few sensitive species.
- Impacts to southern willow scrub and mule fat scrub should be mitigated at a minimum ratio of 3:1 by area. Impacts to open water (pond) should be mitigated at a ratio of 2:1 by area. Impacts to wetlands and riparian habitats are likely to require a Section 404 permit from the U.S. Army Corps of Engineers and/or a Section 1603 Streambed Alteration Agreement from the California Department of Fish and Game.
- Impacts to vernal pools and their associated watershed supporting sensitive vernal pool species should be mitigated through the offsite acquisition of comparable or higher quality vernal pool habitat at a ratio of 3:1 by area. Impacts to vernal pools lacking sensitive vernal pool species should be mitigated through the offsite acquisition of comparable or higher quality vernal pool habitat at a ratio of 1:1 by area.
- Based on the discussions above, four mitigation options are available:
 - 1) Onsite preservation within the MSCP preserve within the NCFUA;
 - 2) Onsite restoration within the MSCP preserve within the NCFUA;

- 3) Payment of fees into a habitat acquisition fund; and
- 4) Offsite acquisition within the MSCP preserve outside of the NCFUA.

Onsite Preservation

- Only habitat outside of the 150-foot "edge effect" zone will be available for mitigation. The edge effect zone evaluated in the DEIR starts at the outer edge of brush management zone 1 and extends 150 feet into the preserve. It should be noted however, that the City is considering city-wide mitigation policies that would reduce the area categorized as "edge effect" (and not available to be used for mitigation). Future projects will be subject to regulations in effect at that time.
- Impacts to Diegan coastal sage scrub can be mitigated by assuring permanent preservation of this habitat onsite through dedication of an open space easement to the City of San Diego or other third party beneficiary acceptable to the City of San Diego. As noted above, mitigation for coastal sage scrub will be at a ratio of 1:1. Onsite preservation would total approximately 38.5 acres for Alternatives 1 and 2. Under Alternative 1 there would be a shortfall mitigation requirement of approximately 43.3 acres of coastal sage scrub (46.4 for Alternative 2). As described above, this shortfall could be compensated through offsite purchase and dedication (within the MSCP preserve) of comparable habitat, through onsite restoration, or through payment of fees. If development of the site occurs prior to adoption of the MSCP, any impact to coastal sage scrub will require a review to determine if a Habitat Loss Permit is required from the City pursuant to the City's implementing ordinance, Section 4(d) of the Endangered Species Act.
- Impacts to scrub oak chaparral can be mitigated by assuring permanent preservation of this habitat onsite through dedication of an open space easement to the City of San Diego or other third party beneficiary acceptable to the City. As noted above, mitigation for scrub oak chaparral will be at a minimum ratio of 2:1. Under Alternative 1 there would be an onsite short fall of 9.7 acres of scrub oak chaparral. As described above, this shortfall could be compensated through offsite purchase and dedication of habitat or through onsite restoration.
- Impacts to wetlands typically can be mitigated only through habitat creation and/or restoration. For impacts to wetlands occurring outside of the proposed MSCP preserve, however, a combination of habitat restoration and habitat preservation is offered as compensation for impacts associated with implementation of the development of Torrey Highlands. At a minimum, at least one acre of wetland habitat creation would be required for each acre impacted. Remaining mitigation requirements could be accomplished made up through wetland habitat acquisition. For example, if one acre of southern willow scrub is impacted, the mitigation requirement is three acres based on the recommended ratio of 3:1 by area. This could be accomplished through

restoration/creation of one acre of southern willow scrub and the acquisition of two additional acres of existing southern willow scrub habitat. This process will be less expensive for the landowner impacting the wetland habitat and will create value for the landowner who has wetland habitat within the MSCP preserve that otherwise would be of no mitigation value.

Habitat Restoration

- Mitigation credits within the Torrey Highlands area proposed for the MSCP preserve could be created through two methods: enhanced natural recovery or active restoration (see Appendix D, Conceptual Mitigation Plan attached to the Biotechnical Study for details). There is adequate restoration potential within the project area to exceed the mitigation needs of upland habitats for either Alternative 1 or 2. Figure IV-C-7 identifies potential restoration areas onsite.

Payment of a Fee

- As an alternative to acquisition of individual parcels to offset specific project impacts, it may be appropriate to establish a fund for acquisition of the MSCP preserve within the NCFUA. The fee would be determined by the City of San Diego and would be based on the appraised value of the properties within the MSCP preserve portion of the NCFUA.

Offsite Acquisition

- Mitigation could be accomplished offsite by preserving an appropriate amount of comparable quality vegetation in an appropriate location per MSCP/RPO guidelines.

SPECIES SPECIFIC MITIGATION

- Mitigation impacts to San Diego mesa mint would be the acquisition of vernal pool habitat offsite that contains San Diego mesa mint at a ratio of 3:1.
- Mitigation for impacts to San Diego button-celery would be the acquisition of vernal pool habitat offsite that contains San Diego button-celery at a ratio of 3:1.
- Mitigation for significant impacts to the remaining sensitive plant species can be accomplished by the use of these species in the restoration palette for scrub oak chaparral and Diegan coastal sage scrub within the proposed biological areas of the MSCP preserve. A replacement ratio of 3:1 for these species is proposed.
- Replacement ratios for occupied gnatcatcher habitat will be determined using the same replacement ratios as outlined for Diegan coastal sage scrub noted earlier. These mitigation measures also would offset impacts to other sage scrub dependent species including the orange-throated whiptail, San Diego horned lizard, southern California rufous-crowned sparrow, Bell's sage sparrow, and San Diego black-tailed jackrabbit.

Other Mitigation Measures

The following mitigation measures would be incorporated into future design of proposed development in order to minimize potential secondary (indirect) impacts to the MSCP Open Space Preserve:

- Equestrian and hiking trails will not be sited to minimize located so as to adversely impacts on areas supporting sensitive biological resources.
- Appropriate fencing will or other barriers may be required to protect direct the Habitat Protection Areas of the MSCP preserve from humans and domestic animals away from the MSCP Preserve intrusion. Fencing used in backyard situations in development areas normally will be sufficient. Fencing or other barriers will be reviewed at the tentative map stage by the City.
- With regard to brush management, the use of alternative compliance should be encouraged during detailed design of future development projects within Subarea IV. This would help in order to reduce brush management impacts to sensitive habitat along canyon rims.
- Future trunk sewer lateral mains that will extend up from the main trunk sewer in the bottom of McGonigle Canyon should be located to the maximum extent possible in disturbed or non-native habitat areas to reduce impacts to sensitive habitat areas.
- Lighting within the development area adjacent to conserved habitat will be minimized and where needed selectively placed, shielded and directed away from native habitat. In addition, lighting from homes abutting conserved habitat will be screened with vegetation, and large spotlight-type lighting that may affect conserved habitat will be prohibited.
- Management of the lands within the MSCP Preserve shall be the responsibility of the owners in fee title of the land.

Mitigation Measure IV-C.2: Prior to approval of improvement plans for Carmel Valley Road over the tributary to McGonigle Canyon in the central portion of the subarea, a wildlife crossing shall be incorporated into the Carmel Valley Road as shown on the Subarea IV Land Use Plan. The undercrossing shall have a length to width ratio of no greater than 2:1; this criteria may be relaxed if the road crossing is separated from the wildlife corridor by more than 30 vertical feet. Minimum bridge/corridor separation shall be 12 feet at the centerline of the drainage. The bridge design shall allow penetration of natural light into the area under the bridge to encourage plant growth. Noise barriers shall be constructed on the bridges, if necessary, to ensure that noise levels within the wildlife corridor do not exceed 60 dB(A) during evening hours.

The undercrossing shall be designed with a span and height clearance to accommodate a regional wildlife corridor. Sufficient area of natural undisturbed grade shall be retained under the crossing to

accommodate unrestricted wildlife movement. Construction of a bridge meeting these criteria is preferred. Multiple culverts may be substituted for a bridge if such culverts are determined by the Director of Development Services to meet these criteria. Construction of the wildlife crossing under Carmel Valley Road is a mitigation requirement and project feature of the already approved Fairbanks Highlands project (DEP No. 88-1041) located directly north of Torrey Highlands. The subdivider shall submit a preliminary design for the wildlife undercrossing, satisfactory to the City Engineer and Director of Development Services. Implementation of these mitigation measures will reduce potentially significant impacts to wildlife movement to below a level of significance.

Mitigation Measure IV-C.3: Prior to approval of tentative maps encompassing a portion of the resource-based MSCP preserve, detailed design of the hiking trails within the resource-based preserve, as conceptually shown on the Subarea IV Plan, shall be prepared and shall locate trails in a manner which would not adversely impact natural plant or wildlife functions of the MSCP preserve. Existing trails may remain; however, no new trails shall be located within the habitat protection areas of the MSCP. Crossings of the habitat protection areas shall be kept to a minimum. Selective fencing shall be used to protect the biological buffer and habitat protection area wherever necessary (e.g., roads) to supplement protection provided by perimeter fencing along development located adjacent to the preserve. The design and location of trails within the MSCP preserve shall be reviewed and approved by the Director of Development Services

Mitigation Measure IV-C.4: Prior to approval of tentative maps or planned development permits, conditions of approval shall be applied to insure that exterior lighting in development areas is designed to avoid illumination of the habitat protection area.

D. HYDROLOGY/WATER QUALITY

The following measures would reduce significant impacts to a level below significance for both Alternatives 1 and 2 associated with encroachment into a 100-year floodplain, water quality impacts from short and long-term construction and urban pollutants, and controlling runoff from onsite:

Mitigation Measure IV-D.1: Future tentative maps and development permits shall be conditioned with the following:

- Prepare a drainage study in accordance with the City of San Diego Drainage Manual, subject to approval by the City Engineer. The Drainage Design Manual includes some of the following:
 - 1) Drainage system design shall be coordinated with the City of San Diego Engineering Department to ensure compatibility with existing and planned drainage facilities;
 - 2) Surface drainage shall be designed to collect and move runoff into adequately sized stream channels and/or drainage structures;

- 3) All project drainage facilities shall be designed to accommodate runoff associated with a 50-year storm event and 100-year storm event for major roads, pursuant to direction by the project engineer and the City Engineer;
 - 4) A maintenance plan by the property owners shall be established for all detention and desilting facilities, pursuant to direction by the project engineer and the City Engineer. Such plans typically require the inspection, cleaning and repair of all facilities after each runoff producing rainfall;
 - 5) Surface and subsurface drainage shall be designed to preclude ponding outside of designated areas, as well as flow down slopes or over disturbed areas;
 - 6) Developed areas shall be surfaced with pervious materials such as decomposed granite or other wherever feasible to increase infiltration and decrease surface runoff;
 - 7) Downstream drainage courses and facilities shall be protected from the potential effects of increased runoff volumes or velocities (if applicable) through the use of flow equalization and/or energy dissipating structures. Such facilities may include detention ponds, drop structures, or other measures, pursuant to direction by the project engineer and the City Engineering Department;
 - 8) Recommendations on the design and location of all surface and subsurface drainage facilities provided during geotechnical and engineering observations of grading and construction activities shall be incorporated into the final project design, pursuant to direction by the City Engineering Department;
 - 9) All appropriate compacted areas shall be scarified to induce infiltration and revegetation;
 - 10) Direct surface drainage to natural slopes and manufactured slopes shall be minimized by (a) grading away from slope, (b) providing drainage swales at tops or toes of manufactured slopes, where appropriate, and (c) providing an underground drainage system.
 - 11) All manufactured slopes shall be landscaped and irrigated to ensure slope stability, reduce erosion, and enhance visual appearance within 90 days of their creation. Temporary slope erosion control measures, such as hydroseeding and slope stability measures shall be undertaken; and
 - 12) Native vegetation shall be preserved wherever feasible, and all disturbed areas shall be reclaimed as soon as possible after completion of grading. Native topsoils shall be stockpiled and reapplied as part of site reclamation whenever feasible.
- Design necessary storm drain facilities extending to a satisfactory point of disposal for the proper control and disposal of storm runoff.

Mitigation Measure IV-D.2: A letter of map revision (LOMR) shall be completed prior to acceptance of subdivision and submitted to the City Engineer. The LOMR shall be submitted to the Federal Emergency Management Agency (FEMA) to revise the FEMA flood insurance rate maps to show encroachment of the project into the 100-year floodplain. Evidence of submittal and approval by FEMA of the LOMR shall be provided to the Director of the Development Services Department prior to approval of tentative maps for the project.

Mitigation Measure IV-D.3: Future tentative maps and development permits shall be conditioned to require that all development within this project area shall comply with all requirements of State Water Resource Control Board (SWRCB) Order No. 92-08-DWQ (NPDES General Permit No. CAS000002), Waste Discharge Requirements for Discharges of Storm Water Runoff Associated With Construction Activity. In accordance with said permits, a Storm Water Pollution Prevention Plan (SWPPP) and a Monitoring Program Plan shall be developed during the tentative map or development permit review with the commencement of grading activities, and a complete and accurate Notice of Intent (NOI) shall be filed with the SWRCB. A copy of the acknowledgment from the SWRCB that an NOI has been received for this project shall be filed with the City of San Diego when received; further, a copy of the completed NOI from the SWRCB showing the construction permit number for this project shall be filed with the City of San Diego when received. Best Management Practices shall be included in the SWPPP and shall be designed in accordance with the Engineering Department's standards for SWPPPs to the satisfaction of the City Engineer.

Mitigation Measure IV-D.4: Future tentative maps and development permits shall be conditioned with the following:

Site specific analysis for each development shall incorporate the current Best Management Practices and Best Available Technologies (BMPs and BATs) available at that time for pollution control and erosion/siltation control. Examples of BMPs and BATs include but are not limited to:

- Grassed swales at parking lot boundaries for pollutant control;
- Energy dissipation structures and rip-rap to stabilize flow and reduce velocities;
- Desilting basins for pollutant and siltation control, resource based if possible;
- Mulching cleared or freshly seeded areas for erosion/sedimentation control;
- Geotextiles and mats for erosion control;
- Storm drain inlet/outlet protection for siltation control;
- Slope drains for erosion control;
- Check dams or drop structures to reduce velocities;
- Silt fences/sand bag barriers for siltation control.

- Specified vehicle fueling and maintenance procedures and hazardous materials storage areas shall be designated to preclude the discharge of hazardous material 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 the use of temporary impervious liners to prevent soil and water contamination;
- To reduce the loading of nutrients in urban runoff; landscape design shall incorporate the use of low-water requirement vegetation;
- Slope planting species shall be chosen for low fertilization requirements, and fertilization shall be discontinued one year after planting for naturalized areas adjacent to open space; and
- All manufactured slopes shall be maintained per Section 7.3., *Maintenance Requirements*, of the City of San Diego Landscape Technical Manual, requiring permanent (or temporary per City direction) irrigation systems to be inspected on a regular basis and properly maintained.

These measures shall be designed according to the City Engineering Department's standards for Urban Stormwater Management. Design and implementation of measures shall be to the satisfaction of the City Engineer.

E. LANDFORM ALTERATION/VISUAL QUALITY

No mitigation is available for the significant impacts associated with the change in visual character of the site. Only the No Project Alternative would mitigate this impact. Impacts to onsite landmarks associated with views of developed areas from offsite vantage points would be reduced but not mitigated through implementation of measures contained in Chapter 5 of the Subarea Plan. These measures include:

- Restriction on extensive grading and/or terracing that disrupts the natural contour and shape of the site;
- Retention of existing characteristics of finger canyons at edge of the preserve;
- Berms and terraces to visually separate land uses;
- Variable slopes to avoid abrupt changes from pads to slopes;
- A maximum manufactured slope ratio of 2:1;
- Landscaping with natives and drought tolerant plants;
- Revegetation of the preserve in accordance with the Landscape Concept Plan;

- Street landscaping;
- Edge interface landscaping; and
- Open fence design along preserve.

Only adoption of the No Project Alternative, Development Under Existing Land Use Regulations Alternative, or the Environmentally Sensitive Alternative would mitigate impacts to onsite landmarks.

Although the Subarea Plan requires that future tentative maps incorporate sensitive grading techniques due to the extent of grading anticipated within areas containing steep slopes, and that based on visibility and distribution throughout the site the finger and tributary canyons affected represent important landforms, significant impacts to landforms anticipated in conjunction with the Master Plan are not considered to be fully mitigated through incorporation of policies requiring sensitive grading techniques.

The loss of the significant stand of eucalyptus trees would be mitigated to a level below significance by the following mitigation measure:

Mitigation Measure IV-E.1: Prior to Final Map approval, a landscaping concept plan for the high school site shall be prepared and submitted to the Director of Development Services for approval. The landscape concept plan shall identify new landscape features to be incorporated in accordance with the Subarea IV Plan Design Guidelines including planting of trees to replace eucalyptus trees lost as a result of development.

F. CULTURAL RESOURCES

Cultural resource sites CA-SDI-5536, CA-SDI-6670, CA-SDI-6671, CA-SDI-8759, CA-SDI-10306, and CA-SDI-11148-H noted above have been tested and identified as not significant. All remaining sites and impacts are considered significant until testing has occurred on the remaining sites and a determination of significance by a qualified archaeologist is obtained. Mitigation is proposed for these sites to mitigate potential significant impacts to sites to below a level of significance. Other areas of Subarea IV will require surveys prior to development (see *Figure IV-F-1*).

Mitigation Measure IV-F.1: In conjunction with subsequent environmental review and prior to approval of grading permits for future development within Subarea IV, testing of all previously not tested onsite prehistoric and historic resources shall occur and a determination of significance ascertained. Sites determined to be significant by the testing program shall either be preserved or mitigated through research design and data recovery to the satisfaction of the Director of Development Services. *Figure IV-F-1* indicates those areas of Subarea IV for which cultural resource surveys will be required, and possible testing program established, depending on the results of the surveys.

Recommendations for Testing

Prehistoric Sites

Six of the sites (CA-SDI-5536, -6670, -6671, -8759, -10306, and -11148-H) have been previously tested and have been identified as not significant. The remaining sites will need testing to determine site significance. The recommendations for testing are based on the City of San Diego Evaluation Guidelines and the Sparse Lithic Scatter Program (SLSP recommended by the State Office of Historic Preservation). These two approaches take into consideration site type and site size. For sites that contain ground stone or fire-affected rock, since these may represent habitation, the City of San Diego Evaluation Guidelines are followed. For sites that meet SLSP criteria, the SLSP is recommended with the modification to limit subsurface work and to increase the surface collection up to 100 percent. SLSP criteria are that: a) only flaked stone is present; b) no subsurface deposit is present; and c) there are less than 3 items per square meter.

Table 3 lists the prehistoric sites within Subarea IV and the recommended approach for testing the sites. Surface collection is recommended for all sites. For sparse artifact and lithic scatters, the surface collection may consist of point proveniencing items. For more concentrated areas, such as specific loci or flaking stations, the surface collection may consist of collection of items by quadrangles (i.e., 1x1 m or 5x5 m). For artifact scatters and lithic scatters that may represent work areas rather than quarries, 1x1 m test units are recommended with the recommended number based on the site size as determined by survey data and based on City of San Diego Evaluation Guidelines. For quarry areas that meet the SLSP criteria, a phased testing program is recommended. Following the surface collection, a limited number of 50x50 cm subsurface exploration excavation units (SEEU) are recommended since these sites have little potential for subsurface deposits. However, if during the surface collection or excavation of the SEEU, if artifact types other than flaked stone are found, a subsurface deposit is identified, or subsurface features are encountered, the sites should be treated following the City of San Diego Evaluation Guidelines (i.e., using 1x1 m test units rather than SEEU).

For sites that could not be relocated and have not been previously tested (CA-SDI-4620, -5324, -5327, -10307, -12507), the City requires extended testing. Extended testing includes but may not be limited to field survey, surface collection of artifacts (if site is relocated), and subsurface excavation (backhoe and/or manual).

Historic/Prehistoric Site

Site CA-SDI-13077-H has both a historic and prehistoric component. Historic features include two circular cobble features and one rectangular cobble feature. Surface historic artifacts include one square metal spike and fragments of two hole-in-cap cans. A 1928 aerial photograph (Tax Factor Inc. 1928) reveals a narrow strip of land in association with these features had once been cleared. As depicted on the photograph, the cleared area resembles an old unimproved airstrip. Additional historical research

TABLE 3. RECOMMENDED TESTING FOR PREHISTORIC SITES

Site No. CA:SDI	Site Type	Site Size (Sq.M.)	Relocated	Tested	Status	RECOMMENDED TESTING PROGRAM			
						Surface Collection	No. of 1x1m Units	No. of SEEs	Other
4620	Habitation	900	No	No	Unknown	---	---	---	Extended testing
5324	Habitation	55	No	No	Unknown	---	---	---	Extended testing
5325	Artifact Scatter	2,125	Yes	No	Unknown	Yes	6	0	
5326	Lithic Scatter	17,500	Yes	No	Unknown	Yes	0	10+	
5327	Lithic Scatter	0.2	No	No	Unknown	---	---	---	Extended testing
5328	Artifact Scatter	800	Yes	No	Unknown	Yes	4	0	
5536	Lithic Scatter	4,900	No	Yes	Not Significant	N/A	N/A	N/A	
6670	Habitation	1,600	Yes	Yes	Not Significant	N/A	N/A	N/A	
6671	Habitation	900	Yes	Yes	Not Significant	N/A	N/A	N/A	
8759	Habitation	900	Yes	Yes	Not Significant	N/A	N/A	N/A	
10306	Habitation	1,000	Yes	Yes	Not Significant	N/A	N/A	N/A	
10307	Habitation	1,000	No	No	Unknown	---	---	---	Extended testing
11148-H	Historic	65,968	Yes	Yes	Not Significant	N/A	N/A	N/A	
12507	Lithic Scatter	7,500	No	No	Unknown	---	---	---	Extended testing
12508	Habitation	1,800	Yes	No	Unknown	Yes	4	0	
13077/H	Historic/LS	4,050	Yes	No	Unknown	Yes	0	2	
13078/6045	Habitation	48,000	Yes	No	Unknown	Yes	10+	0	
13079	Artifact Scatter	200	Yes	No	Unknown	Yes	2	0	
13080	Habitation	532	Yes	No	Unknown	Yes	2	0	
13081	Habitation	6,075	Yes	No	Unknown	Yes	6	0	
13082	Lithic Scatter	375	Yes	No	Unknown	Yes	0	2	
13194	Lithic Scatter	1,020	Yes	No	Unknown	Yes	0	4	
13195	Lithic Scatter	6,000	Yes	No	Unknown	Yes	0	6	

and mechanical trenching is recommended to determine the historic nature of the site. If a subsurface deposit or features are found during the trenching, excavation of subsurface units may be necessary. The smaller prehistoric lithic scatter component will be tested using the SLSP (see *Table 3*).

Prior to implementation of a testing program, the local Native American community should be informed and encouraged to participate, although their participation is not required. Provisions should be made to allow interested individuals to visit the sites during the testing, and the local Native American community should be informed of the testing results.

G. AIR QUALITY

Because of the non-attainment status of the SDAB, all future growth, including Subarea IV Alternative 1 or Alternative 2, would result in a cumulatively significant and unmitigable regional air quality impact. The proposed Torrey Highlands plans would develop 2,600 single-family units which exceeds the City's

threshold for significance, thereby resulting in a significant cumulative, unmitigable air quality impact. Only adoption of the No Project Alternative would avoid significant impacts to air quality. Construction impacts relative to the generation of dust and other airborne particulates would be significant but mitigable. The following measures would reduce significant impacts associated with construction to a level below significance, and would help reduce air quality traffic emissions impacts:

Mitigation Measure IV-G.1: Future Tentative Maps shall incorporate non-vehicular travel modes of commuter access to the project to the satisfaction of the Director of Development Services. These measures shall include, but not be limited to the following:

- Incorporation of transit access consideration into project design in accordance with City of San Diego Transit-oriented Design Guidelines;
- Traffic flow improvements to reduce congestion;
- Inclusion of bike lanes for non-vehicular modes of transportation; and
- Inclusion of transit system facilities outlined in Section 3.4 of the Subarea Plan.

Mitigation Measure IV-G.2: Prior to approval of grading permits for all future tentative maps, construction impact mitigation for all future projects within Subarea IV shall require development and implementation of a construction dust abatement management program. Dust abatement should consist of, but not be limited to, soil stabilizers, truck wash stations, and site watering to the satisfaction of the Director of Development Services Department. The dust abatement program shall achieve a minimum of 80 percent dust abatement. Non-compliance shall result in a cessation of all construction activities. The dust abatement program shall be made a condition of the grading permit and monitored by the City.

H. GEOLOGY/SOILS

There are no soil or geologic conditions which were observed or known to exist on the project site which would preclude development of the property or establishment of the proposed open space areas. However, potentially significant geologic and soil conditions exist which would require mitigation, including landslides, expansive soils, alluvial soils, poorly consolidated soils, liquefaction potential and ground shaking due to an earthquake. The following mitigation measures would reduce impacts associated with unstable geologic formations, soils, erosion potential, and geologic hazards to below a level of significance for both alternatives.

Mitigation Measure IV-H.1: Prior to grading permit issuance for any proposed development on the project site, a project-specific geotechnical study of the geologic conditions shall be submitted to and approved by the City Engineer. The evaluation shall include, but shall not be limited to, an analysis of the following conditions in areas to be graded and developed: gross and surficial slope stability, earthen dam stability, ancient landslide and mudflow potential, hydrostatic pressure potential, and liquefaction

potential. The evaluation shall provide remedial grading measures to mitigate any significant impact associated with the foregoing conditions including unstable soil, bedrock, groundwater, or seismic conditions. Grading and development plans shall be reviewed and approved by the City Engineer to determine compliance with the remedial grading measures identified in the project-specific geotechnical reports.

Mitigation Measure IV-H.2: Incorporate Best Management Practices of short-term erosion control measures, including sandbagging, temporary detention basins, and planting of disturbed slopes into grading plans for the proposed project, to the satisfaction of the City Engineering Department and in compliance with the Development Services Department.

Mitigation Measure IV-H.3: Prior to grading permit issuance for future projects, a site-specific erosion control and landscaping plan shall be submitted to and approved by the City Development Services Department. This plan will include measures to mitigate erosion and transport both during and immediately after construction (e.g., sediment traps or detention facilities), as well as landscaping for short- and long-term erosion control on manufactured slopes. A phased planting plan shall be prepared which requires installation of erosion-resistant ground cover within 30 days of completion of grading. The construction management plan required by Mitigation Measure IV-A.2 will require that construction be phased to minimize the number of graded slopes occurring at any one time in order to minimize erosion potential. Erosion control measures shall include those measures identified in *Section IV-D, Hydrology/Water Quality*, for erosion potential. These measures are identified under Mitigation Measures IV-D1 and IV-D.4 and include geotextiles, slope drains, slope revegetation and silt fencing.

I. AGRICULTURE/NATURAL RESOURCES

Implementation of Alternatives 1 and 2 would result in the significant cumulative loss of designated prime agricultural lands and state-designated onsite aggregate resources. Only implementation of the No Project Alternative would avoid these impacts. No measures are available which would reduce the significant cumulative impacts.

J. PALEONTOLOGY

Grading associated with Alternatives 1 and 2 would result in potentially significant impacts to paleontological resources. The mitigation measure provided below for future specific development proposals would sufficiently insure the recovery of any resources and reduce significant potential impacts to below a level of significance.

Mitigation Measure IV-J.1: Prior to issuance of a grading permit, written verification that a qualified paleontologist and/or paleontological monitor has been retained to implement this monitoring program shall be provided to the City. Verification shall be in the form of a letter from the project applicant to the Development Services Department Director. A qualified paleontologist is defined as an individual

with a Ph.D. or M.S. degree in paleontology or geology, who is a recognized expert in the application of paleontological procedures and techniques such as screen washing of materials and identification of fossil deposits. A paleontological monitor is defined as an individual who has experience in the collection and salvage of fossil materials and who is working under the direction of a qualified paleontologist. All persons involved in the paleontological monitoring shall be approved by EAS prior to any pre-construction meetings.

The qualified paleontologist shall attend any pre-construction meetings to consult with the excavation contractor. The project applicant shall notify EAS staff of any pre-construction meeting dates, and of the start and end of construction. The requirement for paleontological monitoring shall be noted on all grading plans. The paleontologist's duties shall include monitoring, salvaging, preparation of materials for deposit at a scientific institution that houses paleontological collections, and preparation of a report summarizing the results of the monitoring efforts. The duties are defined as follows:

a. Monitoring

The paleontologist or paleontological monitor shall be onsite during all excavation activities in previously undisturbed areas of the Mission Valley, Linda Vista, Stadium Conglomerate, Delmar and Torrey Sandstone Formations to inspect for well-preserved fossils. The described monitoring is necessary to determine the nature of the material and the extent of fossils present. The material also shall be screened for any vertebrate remains. The paleontologist shall work with the contractor to determine the monitoring locations and the amount of time necessary to ensure adequate monitoring of the project.

b. Salvaging

In the event that well-preserved fossils are found, the paleontologist shall have the authority to divert, direct, or temporarily halt construction activities in the area of discovery to allow recovery of fossil remains in a timely manner. Recovery is anticipated to take from one hour to a maximum of two (2) days. At the time of discovery, the paleontologist shall contact EAS. EAS must concur with the salvaging methods before construction is allowed to resume.

c. Preparation

Fossil remains shall be cleaned, sorted, catalogued, and then deposited in a scientific institution that houses paleontological collections (such as the San Diego Natural History Museum).

d. Monitoring Report

A monitoring report, with appropriate graphics (including an 800' scale site map), summarizing the results, analysis and conclusions of the above program shall be prepared and submitted to EAS within three (3) months following termination of the paleontological monitoring program. Building permits shall not be approved prior to receipt of this report.

K. NOISE

Implementation of Alternatives 1 and 2 would result in significant noise impacts to onsite receptors from project construction and traffic-generated noise. Specific mitigation measures cannot be determined at this time as more specific project information will be required. However, general mitigation measures could include any of the following measures or a combination of the measures:

- 1) Setbacks – Locating residential usable open space areas beyond the 65 dB CNEL noise contour as previously shown in *Figures IV-K-3 and IV-K-4*. Outdoor usable areas of commercial, retail and industrial uses should be setback a minimum of 295 feet from SR-56.
- 2) Building Orientation – Orient buildings so that the outdoor living areas are shielded from SR-56, Carmel Valley Road and Camino Ruiz noise.
- 3) Noise Barriers - Construct berms or noise walls. Generally, noise barriers six to seven-feet in height adjacent to Camino Ruiz and Carmel Valley Road and noise barriers five feet in height adjacent to Streets "A" and "B" would mitigate the traffic noise impact. A higher barrier would most likely be necessary at residences adjacent to SR-56. The exact height of the noise barriers would depend on the setback distance as well as the building pad and road elevations.

Single and Multi-family residences exposed to a CNEL greater than 60 dB would require an acoustical analysis to ensure that the interior noise levels do not exceed a CNEL of 45 dB. To achieve the interior noise standard windows would most likely need to be closed. Therefore, air conditioning and/or mechanical ventilation would be required. In addition, sound-rated windows may be necessary for some of the residences adjacent to the major roads.

Mitigation Measure IV-K.1: Prior to issuance of a Planned Residential Development (PRD) permit, an acoustical report prepared by a qualified acoustician will develop appropriate mitigation measures for the residences and usable open space areas. Recommended measures shall be incorporated into the project design. The City Engineer shall review project design for compliance with the City's noise criteria.

Mitigation Measure IV-K.2: Future grading permits shall be conditioned such that all construction and general maintenance activities, except in an emergency, shall be limited to the hours of 7 a.m. to 7 p.m. Monday through Saturday. All onsite construction equipment shall have properly operating mufflers and all construction staging areas shall be as far away as possible from any surrounding already completed residences if later phases of development bring construction sources close to new project housing units.

L. PUBLIC FACILITIES AND SERVICES

The Framework Plan and the proposed Subarea IV Plan set forth measures which would potentially reduce significant impacts to public facilities and services to below a level of significance.

Implementation of these measures, once made a part of the Subarea IV Plan, would occur during subsequent discretionary actions and must be made conditions of such actions.

Mitigation Measure IV-L.1: Prior to Subarea Plan approval, a School Facilities Plan for Torrey Highlands shall be completed which defines the financing and phasing necessary to assure adequate schools concurrent with demand. The responsibility of the project to provide funding for construction of proposed onsite elementary and high school facilities as well as offsite middle school facilities shall be determined prior to approval of the Subarea Plan.

Mitigation Measure IV-L.2: Prior to Subarea Plan approval, a Public Facilities Financing Plan shall be completed which establishes fair share contributions for property within the NCFUA for regional facilities including community parks, libraries, fire stations and law enforcement facilities. The Subarea IV Plan shall require payment of approved fees.

Mitigation Measure IV-L.3 Prior to approval of Final Maps within Subarea IV, the City Engineering and Development Department shall review the water distribution plans to determine their consistency with water distribution plans approved for the NCFUA by the City.

Mitigation Measure IV-L.4: As required by the Subarea Plan, future projects within Subarea IV would be required to comply with City Council Policy 900-06 and SRRE.

Mitigation Measure IV-L.5: Development within the project shall comply with the construction timing and funding requirements established in the approved Facilities Benefits Assessment for the Carmel Mountain Road Water Pipeline and the Carmel Valley Road Trunk Sewer. Development shall also pay its fair share of other onsite and offsite water and sewer facility improvements necessary to serve their respective developments, as identified in the City's Water Master Plan (currently in preparation), the Facilities Benefits Assessment, or during City Review of proposed tentative maps.

M. WATER CONSERVATION

Implementation of either Alternative 1 or 2 would result in a significant increase in water demand and would represent a significant cumulative impact on available water resources.

The following measures are required by the Subarea Plan (*Section 5.3*) to reduce water consumption associated with landscaping, grading and housing. These measures would be required of future projects proposed within the Subarea.

- Runoff from landscaped areas shall be reduced through utilization of berming, raised planters and drip irrigation;
- Vegetation indigenous to the area and drought tolerant plant materials shall be emphasized in the Subarea IV streetscape;

- Plantings on all manufactured and existing slopes that abut areas of natural vegetation shall include annuals, perennials, woody ground covers, and shrubs capable of surviving without supplemental water and shall be predominantly indigenous native species appropriate to the specific site conditions;
- All slopes steeper than 6:1 and greater than five feet in height shall be planted with herbaceous or prostrate shrubby ground covers. All internal slopes greater than 15 feet in height shall be planted with a combination of trees, shrubs, and ground covers (minimum one-gallon size) at an average rate of one tree or shrub per 100 square feet of slope area. A minimum of 50 percent of shrubs and ground covers shall be a deep root variety (root depth of five feet or greater);
- Turf will not be installed as a ground cover within parkways since it requires intensive watering and maintenance;
- All shrubs, ground covers, manufactured and disturbed slope plantings, and lawn areas shall be permanently irrigated. Irrigation systems shall be fully automatic. Low precipitation sprinkler heads and other water conservation devices will enable the system to distribute water efficiently while maintaining adequate coverage and health of plant materials;
- Limit grading in areas where no construction is proposed, thereby reducing the need for planting and irrigation of graded areas;
- Provide lifts of low clay content soil in landscaped areas to improve infiltration;
- Install soil moisture override systems in all common irrigation areas to avoid sprinkling when the ground is already saturate;
- Include in the project design guidelines a plant materials list identifying whether or not plants are native or naturalize easily and incorporate a list of local California sources for native plants;
- Incorporate low-flush toilets, low-flow faucets, and timers on sprinklers (including nighttime watering) into project design; and
- Provide information regarding water conservation measures to new residents at the time of lot purchase.

Implementation of mitigation measures *IV-L-4* and *IV-L-5*, as well as measures provided in the Subarea IV Plan, would reduce the project's impact on future water supplies; however, the cumulative impact would remain significant. Additional measures to offset, reduce, or alleviate impacts will be specified during subsequent environmental review associated with future tentative maps and planned developments submitted within Subarea IV. Subsequent analysis should also examine, in greater detail, the secondary impacts which may occur as a result of water conservation mitigation.

N. SAFETY

Implementation of Alternatives 1 and 2 could result in potentially significant health and safety impacts to future residences from vectors, electromagnetic fields, hazardous materials, and fire hazards. The following measures reduce significant health and safety impacts to a level below significance:

Mitigation Measure IV-N.1: Due to the speculative nature of EMF impacts, no significant impact has been identified and no mitigations are therefore required. While mitigation is not required, it is highly recommended that future residents (i.e., prior to rental or purchase of a residence), be provided with a written disclosure of the presence of EMF onsite and the controversy regarding its effects. It is also recommended that residential units in the northern neighborhood be set back from any substation built on the SDG&E parcel.

Mitigation Measure IV-N.2: Prior to approval of future planned residential or commercial developments and tentative maps within Subarea IV, the City of San Diego Development Services Department shall review future tentative maps to ensure that vector control measures are incorporated into project planning in accordance with the San Diego County Department of Health. Generally, vector control measures include monitoring to ensure that detention basins and flood control channels are maintained in such a way that small flows are not blocked by sand, silt vegetation or debris. Any water conveyance and storage projects should include provisions for prompt attention to facility leakage or seepage to prevent water logged areas. More specific measures would need to be determined based on the design of future tentative maps and planned developments.

Mitigation Measure IV-N.3: The Subarea Plan shall require design guidelines that specify that any land uses proposing open bodies of water shall comply with standards established by the San Diego County Department of Health. Prior to approval of future planned developments and tentative maps within Subarea IV, the City Engineering and Development Department shall review the tentative maps to ensure that the County Health Department requirements regarding standing water have been incorporated into the project.

Mitigation Measure IV-N.4: Prior to approval of any future tentative maps within this Subarea, a Phase I Site assessment shall be conducted by a qualified hazardous waste consultant. Should contaminated soil be encountered, an industrial hygienist shall be consulted to determine specific health and safety measures for onsite construction workers. The assessment should include soil sampling and analysis for the presence and/or concentration of chlorinated herbicides and pesticides. Prior to approval of future final tentative maps, the City Development Services Department, EAS, shall review the maps to determine that the site assessment has been conducted and that measures have been incorporated into the map design to avoid potential hazards.

Mitigation Measure IV-N.5: Detailed brush management plans submitted in association with future planned developments and tentative maps will comply with the City's *Landscape Technical Manual* and

will be subject to review and approval by the Development Services Department EAS. If due to existing site conditions, a modified brush management plan is proposed, compliance with San Diego Municipal Code, Section 55.0889.0201 and approval by the Fire Chief would be required in addition to approval by the Development Services Department.

O. POPULATION

The proposed residential density of Torrey Highlands is consistent with that envisioned for Subarea IV in the NCFUA Framework. Implementation of facilities financing plans (noted in the appropriate mitigation sections of this EIR) would mitigate the cumulative impacts on public facilities and services from population growth.