

RESOLUTION NUMBER R- 288541

ADOPTED ON APR 15 1997

WHEREAS, on December 23, 1996, submitted an application to the Planning Department for a Planned Residential Development Permit, Resource Protection Ordinance Permit, Vesting Tentative Map, and an Amendment to the North City Future Urbanizing Area ("FUA") Framework Plan (No. 94-0576); 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 April 15, 1997; and

WHEREAS, the Council of The City of San Diego considered the issues discussed in Environmental Impact Report DEP No. 94-0576; NOW, THEREFORE,

BE IT RESOLVED, by the Council of The City of San Diego, that it is hereby certified that Environmental Impact Report DEP No. 94-0576, 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 the Del Mar Highlands Estates permits, vesting tentative map, and amendment to the FUA Framework Plan.

BE IT FURTHER RESOLVED, that pursuant to California Public Resources Code section 21081 and California Code of Regulations section 15091, the City Council hereby adopts the findings made with respect to the project, a copy of which is attached hereto and incorporated herein by reference.

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

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 of which is attached hereto and incorporated herein by reference.

APPROVED: CASEY GWINN, City Attorney

By



Richard A. Duvernay
Deputy City Attorney

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Or.Dept:Dev.Svcs.
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Exhibit A

Candidate Findings and Statement of Overriding Considerations Regarding the Final Environmental Impact Report for Del Mar Highlands Estates Planned Residential Development

The following Findings and Statement of Overriding Considerations are made relative to the conclusions of the Final Environmental Impact Report (final EIR) for the Del Mar Highlands Estates Planned Residential Development (DEP No. 94-0576) proposed within the City of San Diego, California.

Proposed Project

The proposed project would involve the creation of 172 residential units and the extension of roadways and utilities into the project site to serve the new lots. This proposed density is based on the allowable PRD development for the project site (97 units) and 21 units transferred from the 84-acre Shell parcel, plus a 46 percent density bonus for constructing 24 affordable housing units. The 46 percent density bonus for affordable housing includes a 25 percent density bonus (30 units) and an additional 21 percent density bonus (24 units) per the City Municipal Code Section 101.0307.6(B)(2). The proposed lots would be irregularly shaped and would vary in size from approximately 0.25 acre to 2.62 acres.

An area of 5.35 acres at the western project boundary would be provided to accommodate the affordable housing units. The affordable units would be constructed by the project applicant. The San Diego Housing Commission, at a public hearing held on March 25, 1996, approved the 172-unit program for Del Mar Highlands Estates that includes 24 two-bedroom affordable housing units in three 8-plex buildings with parking.

Approximately 307 acres of the 473-acre overall project site would remain as natural open space. Approximately 223 acres of the 389-acre Del Mar Highlands Estates project area would be retained as open space on the slopes above Gonzales Canyon. The entire 84-acre Shell parcel would be retained as open space. As mitigation for the project impacts to sensitive biological resources, the project applicant is proposing to revegetate 36.7 acres of the approximately 77 acres of available disturbed agricultural land within this open space area with native coastal sage scrub vegetation. This revegetation will contribute to the value of Gonzales Canyon as a wildlife corridor as part of the MSCP.

Design guidelines have been proposed for Del Mar Highlands Estates in accordance with PRD regulations. The design guidelines include landscaping concepts, signage, lighting, architectural guidelines, building setbacks, building height limits, wall and fencing plan, development standards for the market and affordable housing, allowable uses, and a brush management plan.

The discretionary approvals necessary for the project include the proposed PRD permit, Framework Plan Amendment, VTM, and Resource Protection Ordinance (RPO) permit also must be approved by the City Council.

Conclusions of the Final EIR

The final EIR evaluates the following environmental issues in relation to the project: land use, hydrology/water quality, landform alteration/visual quality, geology/soils, biology, cultural resources, paleontology, traffic circulation, air quality, noise, public facilities and services, public safety, water conservation, and natural resources/agriculture. The final EIR also evaluates the cumulative and growth-inducing impacts, as well as alternatives to the proposed project.

The final EIR indicates that the Del Mar Highlands Estates Planned Residential Development project's direct and/or cumulative impacts on the following environmental issues can be substantially lessened or avoided if all the proposed mitigation measures recommended in the final EIR are implemented: visual quality, hydrology, geology/soils, biology, cultural resources, paleontology, traffic circulation, air quality, noise, and public services. The final EIR indicates that the direct impacts with regard to landform alteration will remain significant and unmitigated. In addition, the project's cumulative impact to water quality, landform alteration, and biology would remain significant and unmitigated after all proposed mitigation measures are implemented.

The following findings are made pursuant to Section 21081 of CEQA and Title 14 of the California Code of Regulations, Sections 15091 and 15093 (State CEQA Guidelines).

A. Public Resources Code Section 21081(a)

The City Council, having reviewed and considered the information contained in the final EIR for Del Mar Highlands Estates Planned Residential Development project and the public record, finds (pursuant to CEQA and the CEQA Guidelines) that changes or alterations have been required in or incorporated into the project which avoid or substantially lessen the significant environmental effects as identified in the final EIR with respect to the areas of (1) hydrology/water quality, (2) landform alteration, (3) geology/soils, (4) biological resources, (5) cultural resources, (6) paleontology, (7) traffic circulation, (8) air quality, (9) noise, (10) public facilities and services,

(11) public safety, and (12) water conservation. Mitigation measures which would reduce but not substantially lessen the impacts to landform alteration issues have also been incorporated into the project. Implementation of the following recommendations would occur via the imposition of conditions of approval for the project.

1) Hydrology/Water Quality

Impact: The alteration of existing drainage patterns associated with proposed roadway and lot development could result in significant local change to the direction and velocity of on-site flows. Specifically, locally altered drainage patterns could result in erosion and/or undermining of stream channels and banks, potentially threatening adjacent vegetation. Such effects would only be expected on the higher reaches of the drainages, however. By the time flows reach Gonzales Canyon, they would be within established floodways. This would be aided by the presence of a detention basin located in the central portion of the site on the north side of Gonzales Canyon downslope from the proposed development.

Any increase in on-site runoff volumes associated with the proposed project is not considered significant on a direct, indirect, or cumulative basis due to its incremental nature. This conclusion is based on a detailed hydrologic analysis of the proposed project. Implementation of the detention basin will avoid or reduce all impacts related to drainage alteration below a level of significance.

Short-term construction impacts resulting in local erosion and sedimentation associated with on-site runoff are considered potentially significant, due to the amount of cut and fill associated with the proposed roadway and the potential for disturbance of up to approximately 166 acres, which represents the developable area of the site (lots plus roadways and internal slopes). Manufactured slopes and development would occur within and adjacent to on-site local drainages. These temporary impacts would be mitigated to below a level of significance by the following construction-related mitigation. Over the long term, however, downstream effects of the project are expected to be an improvement over current conditions as routine and repeated grading associated with agriculture will cease.

Finding: A detailed hydrologic study has been completed for the proposed project. This study will be incorporated into the final project design and submitted to the City Engineering Department for review prior to the issuance of a grading permit. All applicable comments and recommendations resulting from this review shall be incorporated into the project design prior to issuance of grading permits. The project hydrologic study includes the following types of analyses and requirements and thereby reduce impacts to below a level of significance.

Short-term Construction Practices

1. As a condition of the VTM and to be shown as a note on the grading permit, grading and other surface-disturbing activities either shall be planned to avoid the rainy season (i.e., November through March) to reduce potential erosion impacts or shall employ construction phase erosion control measures, including the short-term use of sandbags, matting, mulch, berms, hay bales, or similar devices along all graded areas to minimize sediment transport. The exact design, location, and schedule of use for such devices shall be conducted pursuant to direction and approval by the City Engineering Department.
2. Prior to the issuance of a grading permit, the grading plan shall locate temporary desilting basins at all discharge points adjacent to drainage courses or where substantial drainage alteration is proposed. The exact design and location of such facilities shall be conducted pursuant to direction by the City Engineering Department.
3. As condition of the VTM, the subdivider shall within 90 days of completion of grading activities hydroseed and landscape graded and common areas with appropriate ground cover vegetation consistent with the biology section mitigation requirements (e.g., use of native or noninvasive plants). These revegetated areas shall be inspected monthly by a qualified biologist until vegetation has been firmly established as determined by the City's grading inspector.
4. Compacted areas shall be scarified, where appropriate, to induce surface water infiltration and revegetation as directed by the project geologist, engineer, and/or biologist.
5. General Construction Activity Storm Water Permits (National Pollutant Discharge Elimination System [NPDES] No. CAS000002) shall be obtained from the State Water Resources Control Board (SWRCB) prior to project implementation. Such permits are required for specific (or a series of related) construction activities which exceed five acres in size and include provisions to eliminate or reduce off-site discharges through implementation of a Storm Water Pollution Prevention Plan (SWPPP). Specific SWPPP provisions include requirements for erosion and sediment control, as well as monitoring requirements both during and after construction. Pollution control measures also require the use of best available technology, best conventional pollutant control technology, and/or best management practices to prevent or reduce pollutant discharge (pursuant to SWRCB definitions and direction).
6. A Dewatering Waste Discharge Permit (NPDES No. CA0108804) shall be obtained for the removal and disposal of groundwater (if necessary) encountered during

construction. Such permits are intended to ensure compliance with applicable water quality, and beneficial use objectives, and typically entail the use of BMPs to meet these requirements. Discharge under this permit will require compliance with a number of physical, chemical, and thermal parameters (as applicable), along with pertinent site-specific conditions (pursuant to RWQCB direction).

7. Specified vehicle fueling and maintenance procedures and hazardous materials storage areas shall be designated to preclude the discharge of hazardous materials used during construction (e.g., fuels, lubricants and solvents). Such designations shall include specific measures to preclude spills or contain hazardous materials, including proper handling and disposal techniques and use of temporary impervious liners to prevent soil and water contamination.

Project Design

As conditions of the vesting tentative map and to be included as notes and exhibits on the grading plan, the following mitigation measures will be required:

8. Postconstruction erosion control measures shall be implemented where proposed disturbance is adjacent to or encroaches within existing drainage courses and projected runoff velocities exceed 5 cfs.
9. Final project design shall incorporate all applicable BMPs contained in the City and State *Best Management Practices to be Considered in the Development of Urban Stormwater Management Plan*. Specifically, these may include measures such as the use of detention basins, retention structures, infiltration facilities, permeable pavements, vegetation controls, discharge controls, maintenance (e.g., street sweeping), and erosion controls.
10. Surface drainage shall be designed to collect and discharge runoff into natural stream channels or drainage structures. All project-related drainage structures shall be adequately sized to accommodate 10-year flood events (or other storm events pursuant to direction from the City).
11. Project operation and maintenance practices shall include a schedule for regular maintenance of all private drainage facilities within common development areas to ensure proper working condition. Public facilities shall be maintained by the City.
12. Surface and subsurface drainage shall be designed to preclude ponding outside of designated areas, as well as flow down slopes or over disturbed areas.
13. Runoff diversion facilities (e.g., inlet pipes and brow ditches) shall be used where appropriate to preclude runoff flow down graded slopes.

14. Energy-dissipating structures (e.g., detention ponds, riprap, or drop structures) shall be used at storm drain outlets, drainage crossings, and/or downstream of all culverts, pipe outlets, and brow ditches to reduce velocity and prevent erosion.

15. Long-term maintenance of the detention basin shall be the responsibility of the City of San Diego.

Impact: The proposed development of the project site has the potential to significantly impact water quality (both directly and cumulatively) in Gonzales Canyon and the San Dieguito River and Lagoon. Specifically, such impacts may be associated with short- and long-term erosion and sedimentation and construction-related contaminant discharge. Although the impacts would continue to remain significant, it is expected that the project effects would be less adverse overall than those currently resulting from commercial agricultural activities on-site. The runoff of urban-generated pollutants is not considered significant (on a direct basis) due to the presence of existing regulatory controls and the anticipated incremental nature and extent of such pollutants, though the incremental contribution of urban pollutants would be cumulatively significant.

Finding: Potential water quality impacts related to erosion and siltation and discharge of construction-related contaminants would be mitigated below a level of significance by incorporating the identified design measures.

2) Landform Alteration

Impact: Project-related landform alteration impacts for Del Mar Highlands Estates would be significant due to the extent of earthwork, the anticipated level of disturbance to 25 percent or greater slopes, and the maximum height and length of the manufactured slopes.

Finding: The above impacts are significant and unmitigated. Mitigation of significant landform impacts would require the modification of the proposed project design to reduce grading and conform with RPO steep slope encroachment criteria.

Impact: The loss of mature eucalyptus trees would be considered a significant but temporary visual impact, due to the large size and high local visibility of these trees. These potential impacts would be reduced below a level of significance through the measure identified below.

Finding: The above impact would be reduced to below a level of significance through replacement of trees removed with saplings at an approximate ratio of 1:1. Replacement trees may consist of any ornamental or native tree species approved by the City of San Diego that will grow to match the height and breadth of lost trees. The designated project mitigation monitor shall verify that the above-described replacement trees are included in the project landscaping plan and shall verify and document the planting of these trees as part of the site development.

3) Geology/Soils

Impact: There are no soil or geologic conditions observed or known to exist on the project site which would preclude development of the property. A number of potentially significant on-site geologic conditions exist, however, including seismically induced ground shaking and landsliding, unstable manufactured slopes, and unsuitable surficial deposits (e.g., expansive or unconsolidated soils). Mitigation of potential landslides could result in temporary removal of vegetation and grading/recompaction of soils beyond the proposed limits of disturbance under RPO.

Finding: The following mitigation measures are required to reduce geology impacts associated with unstable geologic formations, soils, and geologic hazards to below a level of significance.

- a) Prior to grading permit issuance for lot development on the project site (including proposed roadways), a project-specific soils and geological investigation shall be submitted to and approved by the City Engineering and Development Services Departments. The evaluation shall include, but not be limited to, an analysis of the following conditions in areas to be graded and developed: seismic loading, gross and surficial slope stability, landslide and mudflow potential, hydrostatic pressure potential, foundation suitability of soils, and soil expansion. The evaluation shall provide remedial grading and foundation design measures to mitigate any significant impact associated with the foregoing conditions including unstable soil, bedrock, groundwater, or seismic conditions.
- b) Grading and development plans shall be reviewed and approved by the Environmental Analysis Section (EAS) and the City Engineering Department to determine compliance with the remedial grading measures identified in the development-specific geotechnical reports. Geotechnical specifications shall be identified as mitigation measures on grading plans. Field monitoring by a qualified geologist would be required. Should additional resource impacts be identified during plan check or field monitoring, additional environmental review will be required to determine whether or not additional mitigation or revegetation is necessary.

Impact: Although potentially less than the erosion effects from on-site agricultural activities currently experienced downstream, future grading activities for roadways and development pad “terraces” could result in potentially significant soil erosion and transport.

Finding: The proposed project design guidelines described above, as well as mitigation measures identified under Hydrology/Water Quality below, would reduce impacts associated with on-site erosion potential to below a level of significance.

Prior to grading permit issuance for proposed on-site roadways and lot development, a site-specific erosion control and landscaping plan shall be submitted to and approved by the City Development Services Department Director. 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 the provision of landscaping to provide short- and long-term erosion control. Specifically, the landscaping plan shall include long-term landscaping to control erosion from manufactured slopes and erosion-resistant ground cover planting on graded areas immediately upon completion of grading.

4) **Biology**

Impact: The direct impacts to 33.88 acres of Diegan coastal sage scrub habitat would be considered significant. Project impacts to this coastal sage scrub (which supports approximately three pairs of coastal California gnatcatchers) would therefore be considered significant on both the local and regional level. Impacts to coastal sage scrub that is not currently occupied by the gnatcatcher are also considered significant.

Approximately 18 percent (6.65 acres) of the southern maritime chaparral on-site would be impacted, which is considered a significant impact.

Similarly, impacts to mule fat scrub (0.17 acre) would be considered significant based on the wildlife value.

Two out of the eight (25 percent) populations of Palmer’s grappling hook would be either partially or totally impacted by the proposed project. Approximately 126 individuals out of the estimated 173 on-site (73 percent) would be directly impacted. The large amount of impact would be a significant cumulative impact.

Finding: The proposed site design for Del Mar Highlands Estates includes on-site open space consisting of 81.19 acres of gnatcatcher-occupied coastal sage scrub (nearly a 3:1 ratio of area preserved to area impacted). Additionally, 35.7 acres of southern maritime chaparral would be preserved on-site. Mitigation for the habitat impacts includes revegetation of 36.7 acres of the 77 acres of disturbed agricultural land with coastal sage scrub on the Del Mar Highlands Estates property. Areas previously used for agriculture

on the western slopes of the property and in the bottom of Gonzales Canyon will be revegetated and preserved in open space. The remaining 40.3 acres would be available as mitigation for future projects. A revegetation plan has been developed which includes success criteria, a monitoring program, and a surety bond to ensure the creation of coastal sage scrub. Impacts to biological resources are considered to be mitigated below a level of significance.

The project design guidelines also include development standards for open space which include the following:

- Trails, although not included in the current project design, can be accommodated in the future in the open space area. Any trail located in the open space area shall not in the future be located to adversely affect areas supporting sensitive biological resources.
- The Design Guidelines shall reflect that the development of the individual lots abutting conserved habitat shall not permit large spotlight-type lighting directed into the conserved habitat. This shall not prohibit appropriate lighting for tennis courts, swimming pools, etc. so long as the lighting is directed toward the tennis court, swimming pool, etc. In addition, lighting from homes abutting conserved habitat shall be screened with vegetation to the extent appropriate that does not significantly reduce the purpose of the lighting.
- Rear-yard fencing guidelines and wall standards for perimeter lots have been developed and are included in the Design Guidelines.

5) Cultural Resources

Impact: Locus B of site CA-SDI-13,094/H contains an intact prehistoric deposit to 110 cm that dates to approximately 5,000 years B.P. and contains material to answer significant research questions regarding chronology, trade and/or travel, and subsistence. Locus B is identified as not significant under the City of San Diego RPO, as neither the prehistoric nor the historic deposit at this location possesses unique scientific, religious, or ethnic value of local, regional, state, or federal importance; it is not an area of important prehistoric or historic activities or events; and it does not contain burial(s), pictographs, petroglyphs, a solstice observation site, or sacred shrines.

Site CA-SDI-5372/H is considered potentially significant, however this site is in an area to be dedicated to the city of San Diego as permanent open space. Both sites are considered potentially significant and unmitigated at this time. The implementation of the proposed mitigation will achieve a lowering of impact to below a level of significance. Site CA-SDI-5371 has been determined to be outside the boundaries of the proposed Del Mar Highlands Estates VTM, and therefore would not require testing for this project.

Finding: The objective of the mitigation program will be to mitigate impacts to CA-SDI-13,094/H Locus B associated with construction of Del Mar Highlands Estates and to provide a sampling/indexing of site CA-SDI-5372/H.

Site CA-SDI-13,094/H

Mitigation measures are provided for sites identified as either significant under RPO and/or important under CEQA. For site CA-SDI-13,094/H, only the habitation area (420 m² of Locus B) is identified as important under CEQA. Impacts to this localized habitation area can be mitigated to below a level of significance through (1) avoidance, capping, and placement of the 420 m² portion of CA-SDI-13,094/H Locus B within permanent open space dedicated to the City; (2) completion of a data recovery program prior to construction grading; or (3) in concurrence with the City, a combination of capping, indexing the site through a sample excavation, and placement of deed restrictions to avoid direct or indirect impacts. Mitigation measure 3 assumes that the site will not be built on, that capping will not exceed a depth of six feet, and that utility lines or deep-rooted plants will not be placed within the primary site area. The exact location of this deposit needs to be professionally mapped prior to completion of mitigation measures. Mitigation of impacts through data recovery will follow the City of San Diego's 15 percent sample excavation requirement and will be conducted in approximately five percent phases. The excavation program will be structured to provide information to address the research questions of chronology, subsistence, trade and travel, environmental setting, and lithic reduction strategy. Additional specifics on the research questions are provided in Appendix D9. In addition, CA-SDI-13,094/H Locus B will be compared to Norwood and Walker's sites (1980) to evaluate change in these activities through time.

The data recovery program, designed to mitigate direct impacts to approximately 420 m² of CA-SDI-13,094/H Locus B, will be phased to identify the need for additional work. As noted above, the data recovery program will consist of up to a 15 percent excavation (hand and mechanical) program to be completed in three phases. Phase I will consist of a 100 percent surface collection and a 5 percent random sample excavation (21 m²). Phase II will be based on Phase I results and will consist of a 5 percent excavation focused on features (21 m²). The 5 percent Phase III excavation will include hand excavation, backhoe trenching, controlled grading, and excavation of prehistoric features and activity areas. All features will be completely exposed and documented using photographs and illustrations. Block excavations (i.e., 2x2-m or 4x4-m units) will be placed in areas with features and associated artifacts to expose intact living areas.

A random five percent sample will be conducted in the primary habitation area during Phase I. A random number table will be used for unit placement. The Phase I sample (21 m²) will be excavated to determine site content and Phase II unit placement. Upon completion of the five percent sample, the City of San Diego Development Services

Department will be consulted and a determination made regarding Phase II excavation. The Phase II five percent sample within the primary habitation area (additional 21 m²) will be used to open features or activity areas identified during the initial Phase I sample. This phase may include block excavation (i.e., 2x2-m, 4x4-m). Each unit will be excavated in 10-cm levels using the natural surface contour. All soil will be screened through one-eighth-inch mesh screen, and artifacts and ecofacts will be collected by 10-cm levels. All recovered cultural material will be placed in resealable bags and labeled by site number, unit number, level, and date. Given City concurrence, if no features are encountered in Phase I, Phase II may not be conducted and Phase III may be started.

Upon completion of controlled hand excavation, backhoe pretrenching will be completed within the primary habitation area using shallow scrapes with a small bucket. If a concentration of rock is noted, then the backhoe will be stopped and hand excavation will be conducted to determine feature content.

When a feature is identified, either within an excavation unit or during backhoe trenching, the area will be cleared using hand excavation and the feature exposed, mapped, and removed. Any charcoal identified in the feature will be collected for radiocarbon dating. The backhoe pretrenching will be discontinued when the sterile subsurface deposit is encountered.

A standard system of cataloging cultural remains will be used. All cultural material will be washed and separated by material class within each level, prior to cataloging. Artifact classes identified will include flake, angular waste, flaked lithic tool, ground stone, shell, bone, and historic debris. In addition, lithic material for all artifacts will be identified. Flakes are identified as chipping waste containing a striking platform and a bulb of percussion. The remainder of the chipping waste (without a striking platform and a bulb of percussion) is defined as angular waste. Flaked lithic tools will be weighed, measured, and identified by artifact attributes and manufacture technique. Ground stone categories will include manos and metates. Ground stone attributes include shaped/unshaped, number of ground sides, presence of a shoulder, and whether the artifact is pecked, battered, or fire-affected.

Five column samples from five units will be processed either through flotation or by wet-screening through one-sixteenth-inch hardware mesh. The recovered materials will be dried, microsorted, recorded, and weighed. This material may provide a sample of midden contents that could include fish bone, otoliths, shell remains, bird and animal bone, and seeds. These remains will be analyzed by specialists to provide specific species identification.

Each item or group of items will be counted, weighed and/or measured, and given consecutive catalog numbers. Catalog numbers will be marked in ink either directly on the artifact or on an attached label. In addition, each item will then be analyzed for

specific material class attributes. Flakes (diagnostic debitage) will be divided by material type and size. All cataloged items will be separated into typological categories by bag and stored in clearly labeled cardboard boxes.

Photographs, field notes, and artifacts will be temporarily curated by the company conducting the data recovery program until a regional repository becomes available. Catalogs and report copies will be stored on both electronic media and hard copies. Upon completion and acceptance of the final report, copies will be submitted to the South Coastal Information Center at San Diego State University and to the San Diego Museum of Man. A site record form update will be filed at the South Coastal Information Center and San Diego Museum of Man.

Ancillary studies that may be completed for this project are described in Appendix D9 and include faunal and shellfish analysis, obsidian sourcing and hydration rind measurement, radiocarbon dating, lithic analysis, immunological analysis, and soil stratigraphy. Results of obsidian sourcing, obsidian hydration rind measurements, and radiocarbon dating will be used to answer the chronology question. Lithic analysis will be conducted to identify lithic reduction techniques used by the inhabitants of CA-SDI-13,094/H. Immunological analysis will assist in identification of tool use. Analysis of soil stratigraphy will identify intact cultural deposits and assist in answering the chronology question.

Site CA-SDI-5372/H

CA-SDI-5372/H is located within the tentative map area in an area that will be deeded to the City of San Diego as part of a natural open space corridor related to the Draft MSCP. There are no direct impacts identified within or adjacent to the recorded limits of this site. This resource area is identified as a light scatter of flaked lithic debris and the remnants of an historic-era cobble foundation. This site was not tested during previously completed work; however, survey level observations of the site indicate limited resource potential. The recommendation for this site is the completion of a sampling/indexing program which would provide sufficient information to place the historic and prehistoric portions of this site in context with the region prior to preservation in the open space area. The sampling/indexing program that is recommended includes the following steps:

- Conduct archival research of historic-era photographs, maps, and property records to establish background information on the historic-era feature.
- Complete a surface collection of historic and prehistoric materials used as a grid-based plotting system.
- Complete up to 10 shovel test pits in areas of positive surface material and in areas with potential subsurface deposit.

- Complete three sample units of one square meter in size.
- Prepare site map with locations of collected items, shovel test pits, sample units, and surface features.
- Update the site record form with the South Coastal Information Center and the San Diego Museum of Man.
- Clean, separate, and analyze the recovered artifacts and ecofacts. Submit one organic sample for radiocarbon analysis.
- Complete a report of findings and interpretations using the City of San Diego Archaeological Resource Management Report format.

These combined efforts should provide sufficient information to establish a general finding with regard to the quantity, quality, and variety of the archaeological materials that are present at this location and to allow for the placement of this resource site into the developing model of site settlement and chronology for the Carmel Valley region.

6) Paleontology

Impact: Development as a result of Del Mar Highlands Estates would have the potential for significant impacts to paleontological resources. Specifically, significant information regarding the geologic and biostratigraphic conformation of this area of the San Diego Embayment could be destroyed.

Finding: The following mitigation measures shall be conditions of approval of grading permits within the project boundary. The imposition of these measures shall mitigate impacts to below a level of significance.

- a) A qualified paleontologist and/or paleontological monitor shall be retained to implement the monitoring program. A qualified paleontologist is defined as an individual with a Ph.D. or master'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.
- b) The qualified paleontologist shall attend any preconstruction meetings to consult with the excavation contractor. The requirement for paleontological monitoring shall be noted on the construction plans. The paleontologist's duties shall include monitoring, salvaging, preparing materials for deposit at a scientific institution that houses

paleontological collections, and preparing a results report. These duties are defined as follows:

- 1) Monitoring. The paleontologist or paleontological monitor shall be on-site during the original cutting of previously undisturbed areas of the sensitive formation to inspect for well-preserved fossils. 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.
 - 2) 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 days. At the time of discovery, the paleontologist shall contact the Environmental Analysis Section (EAS) of the City of San Diego. EAS must concur with the salvaging methods before construction is allowed to resume.
 - 3) Preparation. Fossil remains shall be cleaned, sorted, cataloged, and then deposited in a scientific institution that houses paleontological collections (such as the San Diego Natural History Museum).
 - 4) Monitoring Results Report. A monitoring results report, with appropriate graphics, summarizing the results, even if negative, analysis, and conclusions of the above program shall be prepared and submitted to EAS within three months following the termination of the paleontological monitoring program.
- c) The Project Manager shall notify EAS staff of any preconstruction meeting dates and of the start and end of construction.
- d) A report of findings, even if negative, shall be filed with the City of San Diego Environmental Analysis Section and the San Diego Natural History Museum prior to issuance of building permits.

It shall be a requirement of the project that the above mitigation measures be conditions of the Del Mar Highlands Estates project. EAS shall verify this is a condition of the project approval.

A note shall be included on the grading plans that the above measures are conditions of approval of grading permits. EAS shall ensure these measures are conditions of the tentative map prior to approval of the tentative map. Prior to issuance of grading permits, EAS and the Engineering Department shall review the grading plans to ensure that these measures are on the plans.

7) Traffic Circulation

Impact: Buildout of the proposed Del Mar Highlands Estates would result in potentially significant impacts to traffic movements at or near the intersection of San Dieguito Road and the project main access. In addition, Del Mar Highlands Estates may contribute to a cumulatively significant regional traffic impact at the El Camino Real/Derby Downs Road intersection. Finally, Del Mar Highlands Estates traffic would contribute to existing significant impacts to traffic flow on El Camino Real between Half Mile Drive and Via de la Valle and on Via de la Valle between El Camino Real (north of Via de la Valle) and San Andres Drive. Both project-specific direct and cumulative impacts would be reduced below a level of significance through the mitigation measures identified below.

Finding: The following mitigation measures shall be included as a condition of the tentative map and in the final project design specifications submitted to the City of San Diego Engineering Department. The project Mitigation Monitoring and Reporting Program shall require verification and documentation that these measures have been incorporated into the final design prior to approval of the proposed Del Mar Highlands Estates tentative map.

- a) At the intersection of San Dieguito Road and the northern main access point, San Dieguito Road shall be modified to provide both westbound-to-southbound left-turn and eastbound-to-southbound right-turn lanes.
- b) The project applicant shall provide fair share contributions for a signal to mitigate traffic impacts at the El Camino Real/Derby Downs Road intersection.
- c) The project applicant shall provide fair share contributions to widen El Camino Real to four lanes between Half Mile Drive and Via de la Valle.
- d) The project applicant shall provide fair share contributions to widen Via de la Valle to four lanes between San Andres Drive and El Camino Real (north of Via de la Valle).

The above mitigation measures shall be included in the final project design specifications submitted to the City of San Diego Engineering Department. The project Mitigation Monitoring and Reporting Program coordinator shall verify and document that these measures have been incorporated into final design prior to approval of the proposed project.

8) Public Services and Utilities

Impact: The proposed project will add an estimated 74 students to the elementary school serving the project site. Given the crowded nature of the schools expected within the

project development time frame, significant adverse impacts are anticipated until a new elementary school is constructed. The additional 63 students anticipated to join the junior and senior high school system as a result of the project also comprise a significant impact to an already overburdened district. Mitigation for these significant impacts is identified below.

Finding: Project residents would be between 0.5 and 6 miles from neighborhood and community parks. Available (e.g., Torrey Pines and Los Peñasquitos Canyon Preserve) and planned (i.e., San Dieguito River Park) resource-based parks are considered sufficient to meet or exceed the needs of proposed project residents. Existing neighborhood and community parks in the area are not adequate to serve new development. This is a potentially significant impact.

Impact: Fire Department response time to the project would be acceptable for the majority of the project site (under six minutes), except for the westernmost lots (Lots 143 to 148) where response time is projected to be approximately 6.8 minutes. Additionally, access to Lots 143 to 148 is via a dead-end roadway which exceeds 750 feet. These are potentially significant impacts.

It is currently unknown whether adequate water supplies would be available to fire fighters. Again, this issue relates particularly to the isolated lots (143 through 148), as there is a greater potential for distance from hydrant hookups along the street.

Although response time to the project is generally projected to be within acceptable limits, there is a potential for significant adverse impacts on emergency access due to the controlled (gated) entrances/exits. As indicated previously, the north access gate is proposed to be staffed 24 hours a day while the east access is proposed to be operated by emergency personnel using a master code, key, or card system.

Finding: Significant impacts identified above would be rendered less than significant through mitigation measures listed below.

- a) Prior to the issuance of any building permit for any residential dwelling unit, the applicant shall participate in mitigation through implementation of a School Agreement (grades K-6) and the participation in a Mello-Roos Community Facilities District (Mello-Roos) (grades 7-12). Prior to the issuance of any building permit for any residential unit, these fees shall be established through a School Agreement with the Solana Beach Elementary School District and the participation in a Mello-Roos with the San Dieguito Union High School District.
- b) The developer shall pay to the City the development's fair share costs in providing population-based parks to serve future residents (i.e., park fees).

- c) In order to minimize emergency response times to future on-site residences, the following requirements will be incorporated into the design guidelines for Del Mar Highlands Estates:
- 1) Large, clearly legible address numbers will be provided at the street.
 - 2) Security entrances will either be staffed 24 hours a day or a security gate code will be provided to the Police and Fire Departments.
 - 3) The developer shall coordinate with the fire department to ensure that road widths and turning radii are adequate for all roads and that project fire hydrants are optimally located. The results of this coordination shall be included within the Del Mar Highlands Estates Design Guidelines and tentative map.
 - 4) Residential fire sprinklers will be required for any structure built on Lots 143, 144, 145, 146, 147, and 148.

9) Public Safety

Impact: In accordance with CEQA Section 15145, the known information about electromagnetic effects has been summarized, but no definitive conclusion has been reached because existing scientific data are inconclusive and potential impacts are therefore speculative. No significant impacts are anticipated from project-related development due to restrictions and approval requirements associated with encroachment into SDG&E easements. Potentially significant impacts related to slowing of emergency vehicles while passing through the electronic gate at the Derby Farms access point for the Del Mar Highlands Estates component also are assessed.

Finding: All identified potential significant human health impacts will be mitigated to less than significant levels through implementation of mitigation measures identified below.

- a) Due to the speculative nature of EMF impacts, no significant impact has been identified and no mitigation measures are therefore required. Habitable structures and project-related activities involving long-term exposure to EMF will be precluded within the existing on-site easement, however, by SDG&E encroachment standards.
- b) All project-related activities shall comply with existing SDG&E standards regarding easement encroachment, thus ensuring that no significant impacts would result in the future on gas or fuel lines.
- c) Fire and Police Department personnel shall be provided with the necessary means (code, card, or key) to pass rapidly through the gate.

10) Water Conservation

Impact: Because water usage would be decreased by up to an anticipated 70 percent (to 90,300 gpd), implementation of the proposed Del Mar Highlands Estates project would not have a significant adverse impact on City water supplies. Nonetheless, imported water supplies are limited and the continuing statewide drought watch condition renders water conservation efforts essential to curtail the cumulative effects of development in southern California.

Finding: Although significant project-level effects were not assessed based on anticipated water use rates for the 172 lots associated with the Del Mar Highlands Estates development, the following mitigation measures shall be incorporated into project design as noted below.

1. Limit grading in areas where no construction is proposed; thereby reducing the need for planting and irrigation of graded areas; (landscaping plans)
2. Provide integrated organic soil amendments in landscaped areas to improve infiltration; (landscaping plans)
3. Reduce runoff potential from landscaped areas by utilizing berming, raised planters, and drip irrigation systems; (landscaping plans)
4. Install soil moisture override systems in all common irrigation areas to avoid sprinkling when the ground is already saturated; (landscaping plans)
5. Identify in the plant materials list in the project design guidelines whether or not plants are native or naturalize easily and incorporate a list of local California sources for native plants; (landscaping plans)
6. Incorporate low-flush toilets, low-flow faucets, and timers on sprinklers (including nighttime watering) into project design; and (building permits)
7. Provide information regarding water conservation measures to new residents at the time of lot purchase. (certificate of occupancy)

B. Public Resources Code Section 21081(b)

The City Council, having reviewed and considered the information contained in the final EIR for the project and the public record, finds there are no changes or alterations to the project which avoid or substantially lessen the significant environmental impacts that are within the responsibility and jurisdiction of another public agency.

C. Public Resources Code Section 21081(c)

The City Council, having reviewed and considered the information contained in the final EIR for the project and the public record, finds there are specific economic, social, and other considerations which make infeasible additional mitigation measures and project alternatives identified in the EIR.

No Project Alternative

The project site would remain essentially in its existing condition, utilized primarily for agricultural production. The significant impacts associated with project implementation and the potentially significant cumulative impacts of proposed and approved developments in the area would not occur under this scenario. These impacts include potential direct and indirect impacts to sensitive biological habitat, landform alteration, loss of mature trees, paleontological resources, cultural resources, runoff and erosion patterns, traffic circulation, public facilities and services (schools, parks, fire, and police services), cumulative water supply (conservation), and public safety.

On the other hand, this scenario would result in the continued agricultural use of over half of the project site, including portions of Gonzales Canyon. This existing land use is dusty and noisy, consumes large amounts of water, and prevents the reestablishment of wildlife habitat and wildlife movement. It results in erosion, sedimentation, use of pesticides and herbicides, and related water quality impacts. This scenario would not facilitate the establishment and enhancement of the Environmental Tier and the MSCP wildlife habitat and corridor in Gonzales Canyon and the connection of Gonzales Canyon to San Dieguito River valley, which would occur with the proposed project. The affordable housing units provided by the proposed project would also not be available to the market.

Finding: This alternative would not provide assurances that the property would not be developed pursuant to the underlying zoning (A-1-10). Thus, this alternative is infeasible, as it would not implement the goals of the General Plan/Framework Plan (e.g., planning concepts of clustering development and dedicating open space consistent with the Environmental Tier).

A-1-10 Rural Cluster Alternative

One of the development alternatives allowed on the project site under the adopted Framework Plan, its current Future Urbanizing Area land use designation, and existing A-1-10 zoning is to develop the property under the City's Rural Cluster Development guidelines. This would allow development of the site according to the density of the applicable zone, but clustered to promote more efficient land utilization. This alternative would develop 37 lots clustered in the northeastern corner of the property, with the

remainder of the project (shown on Lot 38 in the VTM, Figure 9-1) undevelopable unless a phase shift occurs, changing its land use status from a future urbanizing area to a planned urbanizing area. Agricultural use would most likely continue in the agricultural permit areas within Lot 38. Access to the site would be provided from the east via Derby Farms Road, with three roads stubbed at the project limits that could eventually be incorporated into a roadway system throughout the property in conjunction with future development.

Significant landform alteration would be substantially reduced with the implementation of this alternative. Development would be primarily located on the previously farmed mesa tops which would avoid nearly all of the impacts to biological resources. Although impacts to landform alteration/grading and biological resources would be reduced, the impacts would remain significant. Other mitigated impacts of the proposed project, such as impacts to hydrology, cultural resources, transportation, geology, paleontology, air quality, noise, landform alteration/visual, and public safety, would be further reduced by implementation of this alternative.

The rural cluster alternative would have the following potentially significant impacts if mitigation is not incorporated into the project: inconsistencies with the FUA Framework Plan regarding the Environmental Tier; loss of Diegan coastal sage scrub; erosion and subsequent sedimentation in the San Dieguito River and Lagoon; landform alteration in excess of City significance thresholds; significant on-site geologic conditions; potential loss of paleontological resources; impacts to local schools and parks; impacts regarding the provision of water and sewer service; and potential for construction within contaminated soils. Cumulative impacts related to the addition of project traffic to existing queues occurring at the intersections of El Camino Real/San Dieguito Road and San Dieguito Road/Derby Farms Road, increased traffic through the intersection of El Camino Real/Derby Downs Road, solid waste disposal, and water conservation could also occur.

All of the above impacts are mitigable with the possible exception of the landform alteration. In addition, the feasibility of the proposed water and sewer service connections is not known at this time.

Finding: As with the no project scenario above, the A-1-10 rural cluster alternative is also considered infeasible because the remainder of the site could potentially be developed in the future with a phase shift from Future Urbanizing to Planned Urbanizing. As such, this alternative would potentially not implement the goals of the General Plan/Framework Plan as it would not assure the establishment and enhancement of the Environmental Tier and the dedication of draft MSCP wildlife habitat and corridor in Gonzales Canyon and the connection of Gonzales Canyon to the San Dieguito River valley, which would occur with the proposed project. This alternative would also not implement the Framework Plan because of the existing agricultural use that could

continue and because the Framework Plan designates development of the site which is generally consistent with the proposed project.

**STATEMENT OF OVERRIDING CONSIDERATIONS
DEL MAR HIGHLANDS ESTATES VESTING TENTATIVE MAP
AND PLANNED RESIDENTIAL DEVELOPMENT**

The California Environmental Quality Act and the State CEQA Guidelines (Section 15093) 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.
- (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.

The City Council, pursuant to CEQA Guidelines Section 15093, having balanced the benefits of the project against its unavoidable environmental effects which remain notwithstanding the mitigation measures and alternatives described above, determines that such remaining significant environmental effects are acceptable due to the following considerations:

- a) Approval of the Del Mar Highlands Estates PRD will result in the permanent preservation of sensitive biological resources that represents a valuable contribution to the MSCP preserve system. Thus, the public good derived from the following dedication of these parcels to the draft MSCP preserve would be lost if the proposed project is not approved. The contributions will include the following:
 - 1) The proposed site design for Del Mar Highlands Estates includes on-site open space consisting of 81.19 acres of gnatcatcher-occupied coastal sage scrub and 28.38 acres of southern maritime chaparral. These on-site areas to be preserved include habitat for sensitive plant and animal species, such as the coastal California gnatcatcher (federally listed threatened species).

- 2) The project includes revegetation of 36.7 acres of disturbed agricultural land with coastal sage scrub on the Del Mar Highlands Estates property. Areas previously used for agriculture on the western slopes of the property and in the bottom of Gonzales Canyon will be revegetated and preserved in open space. A revegetation plan has been developed which includes success criteria, a monitoring program, and a surety bond to ensure the creation of coastal sage scrub.
- 3) Approximately 147 acres of native habitat would be preserved on-site within the Del Mar Highlands Estates PRD which would contribute to the draft MSCP preserve design. This open space would also allow for a minimum 1,000-foot-wide Gonzales Canyon wildlife corridor and a 800-foot-wide wildlife corridor to the San Dieguito River valley.
- b) The Del Mar Highlands Estates project would provide 24 two-bedroom units within three 8-plex buildings with parking on a prepared site which would be available to low and moderate income households.
- c) Contribution of \$50,000 toward a wildlife crossing beneath San Dieguito Road or other purposes as determined necessary by the City.
- d) The 84-acre Shell parcel within the North City Future Urbanizing Area would be preserved as natural open space consistent with the draft MSCP while allowing for the construction of SR-56 should it be aligned through the parcel.

For these reasons on balance, the City Council finds there are economic, social, and other considerations resulting from the project that serve to override and outweigh the project's unavoidable significant environmental effects, and thus, the adverse unavoidable effects are considered acceptable.

3/27/97

EXHIBIT C

MITIGATION MONITORING AND REPORTING PROGRAM

PLANNED RESIDENTIAL DEVELOPMENT PERMIT, RESOURCE PROTECTION ORDINANCE PERMIT, VESTING TENTATIVE MAP, AND AMENDMENT TO THE NORTH CITY FUTURE URBANIZING AREA FRAMEWORK PLAN , DEL MAR HIGHLANDS ESTATES

DEP NO. 94-0576

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 Environmental Impact Report (Dep No. 94-0576) shall be made conditions of Planned Residential Development Permit and Vesting Tentative Map 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.

R-288541

Exhibit C

Mitigation Monitoring and Reporting Program for Del Mar Highlands Estates DEP No. 940576

The California Environmental Quality Act (CEQA), Section 21081.6, requires that a mitigation monitoring and reporting program be adopted upon certification of an environmental impact report (EIR) in order to ensure that the mitigation measures are implemented. The mitigation monitoring and reporting program specifies what the mitigation is, the entity responsible for monitoring the program, and when in the process it should be accomplished.

The mitigation monitoring and reporting program for Del Mar Highlands Estates is under the jurisdiction of the City of San Diego and other agencies as specified below. The following is a description of the mitigation monitoring and reporting program to be completed for the project. Tables and figures from the EIR for the project (State Clearinghouse No. 96-121073) are referenced in the following text.

1) Hydrology/Water Quality

Impact: The alteration of existing drainage patterns associated with proposed roadway and lot development could result in significant local change to the direction and velocity of on-site flows. Specifically, locally altered drainage patterns could result in erosion and/or undermining of stream channels and banks, potentially threatening adjacent vegetation. Such effects would only be expected on the higher reaches of the drainages, however. By the time flows reach Gonzales Canyon, they should be within established floodways. This would be aided by the presence of detention basins located downstream from most development on two drainages.

Based on a hydrologic study prepared for the Del Mar Highlands Estates Planned Residential Development, the increase in on-site runoff volumes associated with the proposed project is not considered significant from a regional perspective due to its incremental nature.

Short-term construction impacts resulting in local erosion and sedimentation associated with on-site runoff are considered potentially significant, due to the amount of cut and fill associated with the proposed roadway and the potential for disturbance of up to approximately 166 acres, which represents the developable area of the site (lots plus roadways). Manufactured slopes and development would occur within and adjacent to on-site local drainages. Over the long term, however, downstream effects of the project

are expected to be an improvement over current conditions as routine and repeated grading associated with agriculture will cease.

Mitigation: A detailed hydrologic study has been completed for the proposed project. This study will be incorporated into the final project design and submitted to the City Engineering Department for review prior to the issuance of a grading permit. All applicable comments and recommendations resulting from this review shall be incorporated into the project design prior to issuance of grading permits. The project hydrologic study includes the following types of analyses and requirements and thereby will reduce impacts to below a level of significance.

Short-term Construction Practices

As a condition of the grading permit, the following mitigation measures will be specified on the grading plan:

- a) Grading and other surface-disturbing activities either shall be planned to avoid the rainy season (i.e., November through March) to reduce potential erosion impacts or shall, with the approval of the Development Services Director, employ construction phase erosion control measures, including the short-term use of sandbags, matting, mulch, berms, hay bales, or similar devices, along all graded areas to minimize sediment transport. The exact design, location, and schedule of use for such devices shall be conducted pursuant to direction and approval by the City Engineering and Development Services Department.
- b) During grading and construction and until revegetation has occurred, temporary desilting basins shall be used at all discharge points adjacent to drainage courses or where substantial drainage alteration is proposed. The exact design and location of such facilities shall be conducted pursuant to direction by the City Engineering Department.
- c) Within 90 days of completion of grading activities, graded common areas (as opposed to residential lots) created during the construction phase of this project shall be hydroseeded and landscaped with appropriate ground cover vegetation consistent with the biology section mitigation requirements (e.g., use of native or noninvasive plants). These revegetated areas shall be inspected monthly by a qualified biologist until vegetation has been firmly established as determined by the City's grading inspector.
- d) Compacted areas shall be scarified, where appropriate, to induce surface water infiltration and revegetation as directed by the project geologist, engineer, and/or biologist.
- e) General Construction Activity Storm Water Permits (NPDES No. CAS000002) shall be obtained from the State Water Resources Control Board prior to project

implementation. Such permits are required for specific (or a series of related) construction activities which exceed five acres in size and include provisions to eliminate or reduce off-site discharges through implementation of a Storm Water Pollution Prevention Plan. Specific Storm Water Pollution Prevention Plan provisions include requirements for erosion and sediment control, as well as monitoring requirements both during and after construction. Pollution control measures also require the use of best available technology, best conventional pollutant control technology, and/or best management practices (BMPs) to prevent or reduce pollutant discharge (pursuant to State Water Resources Control Board definitions and direction).

- f) A Dewatering Waste Discharge Permit (NPDES No. CA0108804) shall be obtained for the removal and disposal of groundwater (if necessary) encountered during construction. Such permits are intended to ensure compliance with applicable water quality and beneficial use objectives and typically entail the use of BMPs to meet these requirements. Discharge under this permit will require compliance with a number of physical, chemical, and thermal parameters (as applicable), along with pertinent site-specific conditions (pursuant to Regional Water Quality Control Board direction).
- g) Specified vehicle fueling and maintenance procedures and hazardous materials storage areas shall be designated to preclude the discharge of hazardous materials used during construction (e.g., fuels, lubricants, and solvents). Such designations shall include specific measures to preclude spills or contain hazardous materials, including proper handling and disposal techniques and use of temporary impervious liners to prevent soil and water contamination.

Project Design

As conditions of the tentative map, the following mitigation measures will be required:

- h) Final project design shall incorporate all applicable BMPs contained in the City and State *Best Management Practices to be Considered in the Development of Urban Stormwater Management Plan*. Specifically, these may include measures such as the use of detention basins, retention structures, infiltration facilities, permeable pavements, vegetation controls, discharge controls, maintenance (e.g., street sweeping), and erosion controls.
- i) Surface drainage shall be designed to collect and discharge runoff into natural stream channels or drainage structures. All project-related drainage structures shall be adequately sized to accommodate 10-year flood events (or other storm events pursuant to direction from the City).

- j) Project operation and maintenance practices shall include a schedule for regular maintenance of all private drainage facilities within common development areas to ensure proper working condition. Public facilities shall be maintained by the City.
- k) Surface and subsurface drainage shall be designed to preclude ponding outside of designated areas, as well as flow down slopes or over disturbed areas.
- l) Runoff diversion facilities (e.g., inlet pipes and brow ditches) shall be used where appropriate to preclude runoff flow down graded slopes.
- m) Energy-dissipating structures (e.g., detention ponds, riprap, or drop structures) shall be used at storm drain outlets, drainage crossings, and/or downstream of all culverts, pipe outlets, and brow ditches to reduce velocity and prevent erosion.

2) Landform Alteration/Visual Quality

Impact: The loss of mature eucalyptus trees would be considered a temporary but significant visual impact, due to the large size and high local visibility of these trees.

Mitigation: The above impact would be reduced to below a level of significance through replacement of trees removed with saplings at an approximate ratio of 1:1. Replacement trees may consist of any ornamental or native tree species approved by the City of San Diego which will grow to match the height and breadth of lost trees. The designated project mitigation monitor shall verify that the above-described replacement trees are included in the project landscaping plan and shall verify and document the planting of these trees as part of the site development.

Impact: The selective thinning of native vegetation caused by implementation of a brush management program would alter the appearance of natural slopes adjacent to development, and the direct and cumulative effect of brush management would represent a potentially significant visual impact.

Mitigation: Hand thinning brush in zones 2 and 3, which has already been incorporated into the project, would mitigate visual impacts to below a level of significance.

3) Geology/Soils

Impact: There are no soil or geologic conditions observed or known to exist on the project site which would preclude development of the property. A number of potentially significant on-site geologic conditions exist, however, including seismically induced ground shaking and landslides, unstable manufactured slopes, and unsuitable surficial deposits (e.g., expansive or unconsolidated soils). Mitigation of potential landslides could result in temporary removal of vegetation and grading/recompaction of soils

beyond the proposed limits of disturbance under the Resource Protection Ordinance (RPO).

Mitigation: The following mitigation measures are required to reduce geology impacts associated with unstable geologic formations, soils, and geologic hazards to below a level of significance.

- a) Prior to grading permit issuance for lot development on the project site (including proposed roadways), a project-specific soils and geological investigation shall be submitted to and approved by the City Engineering Department. The evaluation shall include, but not be limited to, an analysis of the following conditions in areas to be graded and developed: seismic loading, gross and surficial slope stability, landslide and mudflow potential, hydrostatic pressure potential, foundation suitability of soils, and soil expansion. The evaluation shall provide remedial grading and foundation design measures to mitigate any significant impact associated with the foregoing conditions including unstable soil, bedrock, groundwater, or seismic conditions.
1. Grading and development plans shall be reviewed and approved by the City Engineering Department to determine compliance with the remedial grading measures identified in the development-specific geotechnical reports. Geotechnical specifications shall be identified as mitigation measures on grading plans. Field monitoring by a qualified geologist would be required. Should additional resource impacts be identified during plan check or field monitoring, additional environmental review will be required to determine whether or not additional mitigation or revegetation is necessary.

Impact: Future grading activities for roadways and development pad "terraces" could result in potentially significant soil erosion and transport.

Mitigation: The proposed project design guidelines described above, as well as mitigation measures identified in Section 4.B under Hydrology/Water Quality, would reduce impacts associated with on-site erosion potential to below a level of significance.

Prior to grading permit issuance for proposed on-site roadways and lot development, a site-specific erosion control and landscaping plan shall be submitted to and approved by the City Development Services Department Deputy Director. 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 the provision of landscaping to provide short- and long-term erosion control. Specifically, the landscaping plan shall include long-term landscaping to control erosion from manufactured slopes and erosion-resistant ground cover planting on graded areas which require installation within 30 days of completion of grading.

4) Biology

The direct impacts to 33.88 acres of Diegan coastal sage scrub habitat would be considered significant. Project impacts to this coastal sage scrub (which supports approximately three pairs of coastal California gnatcatchers) would therefore be considered significant on both the local and regional level. Impacts to coastal sage scrub that is not currently occupied by the gnatcatcher are also considered significant. Approximately 18 percent (6.65 acres) of the southern maritime chaparral on-site would be impacted, which is considered a significant impact. Similarly, impacts to mule fat scrub (0.17 acre) would be considered significant based on the wildlife value.

Impacts to 33.88 acres of Diegan coastal sage scrub that is considered occupied by the coastal California gnatcatcher is considered significant.

The project's impacts to biological resources (0.3 acre of coastal sage scrub) as a result of brush management for zone 3 would be considered significant.

Mitigation: The proposed site design for Del Mar Highlands Estates includes on-site open space consisting of 81.19 acres of gnatcatcher-occupied coastal sage scrub (nearly a 3:1 ratio of area preserved to area impacted). Additionally, 28.38 acres of southern maritime chaparral would be preserved on-site. Mitigation for the habitat impacts includes revegetation of 36.7 acres of the 77 acres of disturbed agricultural land with coastal sage scrub on the Del Mar Highlands Estates property. Areas previously used for agriculture on the western slopes of the property and in the bottom of Gonzales Canyon will be revegetated and preserved in open space. The remaining 40.3 acres would be available as mitigation for future projects. A revegetation plan has been developed which includes success criteria, a monitoring program, and a surety bond to ensure the creation of coastal sage scrub. Impacts to biological resources are considered to be mitigated below a level of significance.

The project design guidelines also include development standards for open space which include the following:

- Trails, although not included in the current project design, can be accommodated in the future in the open space area. Any trail located in the open space area shall not in the future be located to adversely affect areas supporting sensitive biological resources.
- The Design Guidelines shall reflect that the development of the individual lots abutting conserved habitat shall not permit large spotlight-type lighting directed into the conserved habitat. This shall not prohibit appropriate lighting for tennis courts, swimming pools, etc. so long as the lighting is directed toward the tennis court, swimming pool, etc. In addition, lighting from homes abutting conserved habitat

shall be screened with vegetation to the extent appropriate that does not significantly reduce the purpose of the lighting.

- Rear-yard fencing guidelines and wall standards for perimeter lots have been developed and are included in the Design Guidelines.

The significant effects of brush management have been reduced by the proposed coastal sage scrub revegetation plan.

5) Cultural Resources

Impact: Locus B of site CA-SDI-13,094/H contains an intact prehistoric deposit to 110 cm that dates to approximately 5,000 years B.P. and contains material to answer significant research questions regarding chronology, trade and/or travel, and subsistence. Locus B is identified as not significant under the City of San Diego RPO, as neither the prehistoric nor the historic deposit at this location possesses unique scientific, religious, or ethnic value of local, regional, state, or federal importance; it is not an area of important prehistoric or historic activities or events; and it does not contain burial(s), pictographs, petroglyphs, a solstice observation site, or sacred shrines.

Site CA-SDI-5372/H is considered potentially significant; however, this site is in an area to be dedicated to the City of San Diego as permanent open space. Both sites are considered potentially significant and unmitigated at this time. The implementation of the proposed mitigation will achieve a lowering of impact to below a level of significance.

Mitigation: The objective of the mitigation program will be to mitigate impacts to CA-SDI-13,094/H Locus B associated with construction of Del Mar Highlands Estates and to provide a sampling/indexing of site CA-SDI-5372/H.

Site CA-SDI-13,094/H

Prior to the issuance of a grading permit, the following mitigation monitoring and reporting procedures shall be completed. Mitigation measures are provided for sites identified as either significant under RPO and/or important under CEQA. For site CA-SDI-13,094/H, only the habitation area (420 m² of Locus B) is identified as important under CEQA. Impacts to this localized habitation area can be mitigated to below a level of significance through (1) avoidance, capping, and placement of the 420 m² portion of CA-SDI-13,094/H Locus B within permanent open space deeded to the City; (2) completion of a data recovery program prior to construction grading; or (3) in concurrence with the City of San Diego, a combination of capping, indexing the site through a sample excavation, and placement of deed restrictions to avoid direct or indirect impacts. Mitigation measure 3 assumes that the site will not be built on, that capping will not exceed a depth of six feet, and that utility lines or deep-rooted plants will not be placed within the primary site area. The exact location of this deposit needs to be

professionally mapped prior to completion of mitigation measures. Mitigation of impacts through data recovery will follow the City of San Diego's 15 percent sample excavation requirement and will be conducted in approximately five percent phases. The excavation program will be structured to provide information to address the research questions of chronology, subsistence, trade and travel, environmental setting, and lithic reduction strategy. Additional specifics on the research questions are provided in Appendix F. In addition, CA-SDI-13,094/H Locus B will be compared to Norwood and Walker's sites (1980) to evaluate change in these activities through time.

The data recovery program, designed to mitigate direct impacts to approximately 420 m² of CA-SDI-13,094/H Locus B, will be phased to identify the need for additional work. As noted above, the data recovery program will consist of up to a 15 percent excavation (hand and mechanical) program to be completed in three phases. Phase I will consist of a 100 percent surface collection and a 5 percent random sample excavation (21 m²). Phase II will be based on Phase I results and will consist of a 5 percent excavation focused on features (21 m²). The 5 percent Phase III excavation will include hand excavation, backhoe trenching, controlled grading, and excavation of prehistoric features and activity areas. All features will be completely exposed and documented using photographs and illustrations. Block excavations (i.e., 2x2-m or 4x4-m units) will be placed in areas with features and associated artifacts to expose intact living areas.

A random five percent sample will be conducted in the primary habitation area during Phase I. A random number table will be used for unit placement. The Phase I sample (21 m²) will be excavated to determine site content and Phase II unit placement. Upon completion of the five percent sample, the City Development Services Department will be consulted and a determination made regarding Phase II excavation. The Phase II five percent sample within the primary habitation area (additional 21 m²) will be used to open features or activity areas identified during the initial Phase I sample. This phase may include block excavation (i.e., 2x2-m, 4x4-m). Each unit will be excavated in 10-cm levels using the natural surface contour. All soil will be screened through one-eighth-inch mesh screen, and artifacts and ecofacts will be collected by 10-cm levels. All recovered cultural material will be placed in resealable bags and labeled by site number, unit number, level, and date. Given City concurrence, if no features are encountered in Phase I, Phase II may not be conducted and Phase III may be started.

Upon completion of controlled hand excavation, backhoe pretrenching will be completed within the primary habitation area using shallow scrapes with a small bucket. If a concentration of rock is noted, then the backhoe will be stopped and hand excavation will be conducted to determine feature content.

When a feature is identified, either within an excavation unit or during backhoe trenching, the area will be cleared using hand excavation and the feature exposed, mapped, and removed. Any charcoal identified in the feature will be collected for

radiocarbon dating. The backhoe pretrenching will be discontinued when the sterile subsurface deposit is encountered.

A standard system of cataloging cultural remains will be used. All cultural material will be washed and separated by material class within each level, prior to cataloging. Artifact classes identified will include flake, angular waste, flaked lithic tool, ground stone, shell, bone, and historic debris. In addition, lithic material for all artifacts will be identified. Flakes are identified as chipping waste containing a striking platform and a bulb of percussion. The remainder of the chipping waste (without a striking platform and a bulb of percussion) is defined as angular waste. Flaked lithic tools will be weighed, measured, and identified by artifact attributes and manufacture technique. Ground stone categories will include manos and metates. Ground stone attributes include shaped/unshaped, number of ground sides, presence of a shoulder, and whether the artifact is pecked, battered, or fire-affected.

Five column samples from five units will be processed either through flotation or by wet-screening through one-sixteenth-inch hardware mesh. The recovered materials will be dried, microsorted, recorded, and weighed. This material may provide a sample of midden contents that could include fish bone, otoliths, shell remains, bird and animal bone, and seeds. These remains will be analyzed by specialists to provide specific species identification.

Each item or group of items will be counted, weighed and/or measured, and given consecutive catalog numbers. Catalog numbers will be marked in ink either directly on the artifact or on an attached label. In addition, each item will then be analyzed for specific material class attributes. Flakes (diagnostic debitage) will be divided by material type and size. All cataloged items will be separated into typological categories by bag and stored in clearly labeled cardboard boxes.

Photographs, field notes, and artifacts will be temporarily curated by the company conducting the data recovery program until a regional repository becomes available. Catalogs and report copies will be stored on both electronic media and hard copies. Upon completion and acceptance of the final report, copies will be submitted to the South Coastal Information Center at San Diego State University and to the San Diego Museum of Man. A site record form update will be filed at the South Coastal Information Center and San Diego Museum of Man.

Ancillary studies that may be completed for this project are described in Appendix F and include faunal and shellfish analysis, obsidian sourcing and hydration rind measurement, radiocarbon dating, lithic analysis, immunological analysis, and soil stratigraphy. Results of obsidian sourcing, obsidian hydration rind measurements, and radiocarbon dating will be used to answer the chronology question. Lithic analysis will be conducted to identify lithic reduction techniques used by the inhabitants of CA-SDI-13,094/H. Immunological

analysis will assist in identification of tool use. Analysis of soil stratigraphy will identify intact cultural deposits and assist in answering the chronology question.

Site CA-SDI-5372/H

Prior to the issuance of a grading permit, the following mitigation monitoring and reporting procedures shall be completed.

CA-SDI-5372/H is located within the tentative map area in an area that will be deeded to the City of San Diego as part of a natural open space corridor related to the Draft MSCP. There are no direct impacts identified within or adjacent to the recorded limits of this site. This resource area is identified as a light scatter of flaked lithic debris and the remnants of an historic-era cobble foundation. This site was not tested during previously completed work; however, survey level observations of the site indicate limited resource potential. The recommendation for this site is the completion of a sampling/indexing program which would provide sufficient information to place the historic and prehistoric portions of this site in context with the region prior to preservation in the open space area. The sampling/indexing program that is recommended includes the following steps:

- Conduct archival research of historic-era photographs, maps, and property records to establish background information on the historic-era feature.
- Complete a surface collection of historic and prehistoric materials used as a grid-based plotting system.
- Complete up to 10 shovel test pits in areas of positive surface material and in areas with potential subsurface deposit.
- Complete three sample units of one square meter in size.
- Prepare site map with locations of collected items, shovel test pits, sample units, and surface features.
- Update the site record form with the South Coastal Information Center and the San Diego Museum of Man.
- Clean, separate, and analyze the recovered artifacts and ecofacts. Submit one organic sample for radiocarbon analysis.
- Complete a report of findings and interpretations using the City of San Diego Archaeological Resource Management Report format.

These combined efforts should provide sufficient information to establish a general finding with regard to the quantity, quality, and variety of the archaeological materials

that are present at this location and to allow for the placement of this resource site into the developing model of site settlement and chronology for the Carmel Valley region.

6) Paleontology

Impact: Development as a result of Del Mar Highlands Estates would have the potential for significant impacts to paleontological resources. Specifically, significant information regarding the geologic and biostratigraphic conformation of this area of the San Diego Embayment could be destroyed.

Mitigation: The following mitigation measures shall be conditions of approval of grading permits within the project boundary. The imposition of these measures shall mitigate impacts to below a level of significance.

- a) A qualified paleontologist and/or paleontological monitor shall be retained to implement the monitoring program. A qualified paleontologist is defined as an individual with a Ph.D. or master'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.
- b) The qualified paleontologist shall attend any preconstruction meetings to consult with the excavation contractor. The requirement for paleontological monitoring shall be noted on the construction plans. The paleontologist's duties shall include monitoring, salvaging, preparing materials for deposit at a scientific institution that houses paleontological collections, and preparing a results report. These duties are defined as follows:
 - 1) Monitoring. The paleontologist or paleontological monitor shall be on-site during the original cutting of previously undisturbed areas of the sensitive formation to inspect for well-preserved fossils. 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.
 - 2) 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 days. At the time of discovery, the paleontologist shall contact the Environmental Analysis Section (EAS) of the City of San Diego. EAS must concur with the salvaging methods before construction is allowed to resume.

- 3) Preparation. Fossil remains shall be cleaned, sorted, cataloged, and then deposited in a scientific institution that houses paleontological collections (such as the San Diego Natural History Museum).
 - 4) Monitoring Results Report. A monitoring results report, with appropriate graphics, summarizing the results, even if negative, analysis, and conclusions of the above program shall be prepared and submitted to EAS within three months following the termination of the paleontological monitoring program.
- c) The Project Manager shall notify EAS staff of any preconstruction meeting dates and of the start and end of construction.
 - d) A report of findings, even if negative, shall be filed with the City of San Diego Environmental Analysis Section and the San Diego Natural History Museum prior to issuance of building permits.

It shall be a requirement of the project that the above mitigation measures be conditions of the Del Mar Highlands Estates project. EAS shall verify this is a condition of the project approval.

A note shall be included on the grading plans that the above measures are conditions of approval of grading permits. EAS shall ensure these measures are conditions of the tentative map prior to approval of the tentative map. Prior to issuance of grading permits, EAS and the Engineering Department shall review the grading plans to ensure that these measures are on the plans.

7) Traffic Circulation

Impact: Buildout of the proposed Del Mar Highlands Estates would result in potentially significant impacts to traffic movements at or near the intersection of San Dieguito Road and the project main access. In addition, Del Mar Highlands Estates may contribute to a cumulatively significant regional traffic impact at the El Camino Real/Derby Downs Road intersection. Finally, Del Mar Highlands Estates traffic would contribute to existing significant impacts to traffic flow on El Camino Real between Half Mile Drive and Via de la Valle and on Via de la Valle between El Camino Real (north of Via de la Valle) and San Andres Drive. Both project-specific direct and cumulative impacts would be reduced below a level of significance through the mitigation measures identified below.

Mitigation: The following mitigation measures shall be included as a condition of the tentative map and in the final project design specifications submitted to the City of San Diego Engineering Department. The project Mitigation Monitoring and Reporting Program shall require verification and documentation that these measures have been

incorporated into the final design prior to approval of the proposed Del Mar Highlands Estates tentative map.

- a) At the intersection of San Dieguito Road and the northern main access point, San Dieguito Road shall be modified to provide both westbound-to-southbound left-turn and eastbound-to-southbound right-turn lanes.
- b) The project applicant shall provide fair share contributions for a signal to mitigate traffic impacts at the El Camino Real/Derby Downs Road intersection.
- c) The project applicant shall provide fair share contributions to widen El Camino Real to four lanes between Half Mile Drive and Via de la Valle.
- d) The project applicant shall provide fair share contributions to widen Via de la Valle to four lanes between San Andres Drive and El Camino Real (north of Via de la Valle).

The above mitigation measures shall be included in the final project design specifications submitted to the City of San Diego Engineering Department. The project Mitigation Monitoring and Reporting Program coordinator shall verify and document that these measures have been incorporated into final design prior to approval of the proposed project.

8) Public Facilities and Services

Impact: The proposed project will add an estimated 74 students to the elementary school serving the project site. Given the crowded nature of the schools expected within the project development time frame, significant adverse impacts are anticipated until a new elementary school is constructed. The additional 63 students anticipated to join the junior and senior high school system as a result of the project also comprise a significant impact to an already overburdened district. Mitigation for these significant impacts is identified below.

Impact: Project residents would be between 0.5 and 6 miles from neighborhood and community parks. Available (e.g., Torrey Pines and Los Peñasquitos Canyon Preserve) and planned (i.e., San Dieguito River Park) resource-based parks are considered sufficient to meet or exceed the needs of proposed project residents. Existing neighborhood and community parks in the area are not adequate to serve new development. This is a potentially significant impact.

Impact: Fire Department response time to the project would be acceptable for the majority of the project site (under six minutes), except for the westernmost lots (Lots 143 to 148) where response time is projected to be approximately 6.8 minutes. Additionally,

access to Lots 143 to 148 is via a dead-end roadway which exceeds 750 feet. These are potentially significant impacts.

It is currently unknown whether adequate water supplies would be available to fire fighters. Again, this issue relates particularly to the isolated lots (143 through 148), as there is a greater potential for distance from hydrant hookups along the street.

Although response time to the project is generally projected to be within acceptable limits, there is a potential for significant adverse impacts on emergency access due to the controlled (gated) entrances/exits. As indicated previously, the north access gate is proposed to be staffed 24 hours a day while the east access is proposed to be operated by emergency personnel using a master code, key, or card system.

Mitigation: Significant impacts identified above would be rendered less than significant through mitigation measures listed below.

- a) Prior to the issuance of any building permit for any residential dwelling unit, the applicant shall participate in mitigation through implementation of a School Agreement (grades K-6) and the participation in a Mello-Roos Community Facilities District (Mello-Roos) (grades 7-12). Prior to the issuance of any building permit for any residential unit, these fees shall be established through a School Agreement with the Solana Beach Elementary School District and the participation in a Mello-Roos with the San Dieguito Union High School District.
- b) The developer shall pay to the City the development's fair share costs in providing population-based parks to serve future residents (i.e., park fees).
- c) In order to minimize emergency response times to future on-site residences, the following requirements will be incorporated into the design guidelines for Del Mar Highlands Estates:
 - 1) Large, clearly legible address numbers will be provided at the street.
 - 2) Security entrances will either be staffed 24 hours a day or a security gate code will be provided to the Police and Fire Departments.
 - 3) The developer shall coordinate with the fire department to ensure that road widths and turning radii are adequate for all roads and that project fire hydrants are optimally located. The results of this coordination shall be included within the Del Mar Highlands Estates Design Guidelines and tentative map.
 - 4) Residential fire sprinklers will be required for any structure built on Lots 143, 144, 145, 146, 147, and 148.

9) Public Safety

Impact: In accordance with CEQA Section 15145, the known information about electromagnetic field (EMF) effects has been summarized, but no definitive conclusion has been reached, because existing scientific data are inconclusive and potential impacts are therefore speculative. No significant impacts are anticipated from project-related development due to restrictions and approval requirements associated with encroachment into SDG&E easements. Potentially significant impacts related to slowing of emergency vehicles while passing through the electronic gate at the Derby Farms access point of the Del Mar Highlands Estates component also are assessed.

Mitigation: All identified potential significant human health impacts will be mitigated to less than significant levels through implementation of mitigation measures identified below.

- a) Due to the speculative nature of EMF impacts, no significant impact has been identified and no mitigation measures are therefore required. Habitable structures and project-related activities involving long-term exposure to EMF will be precluded within the existing on-site easement, however, by SDG&E encroachment standards.
- b) All project-related activities shall comply with existing SDG&E standards regarding easement encroachment, thus ensuring that no significant impacts would result in the future on gas or fuel lines.
- c) Fire and Police Department personnel shall be provided with the necessary means (code, card, or key) to pass rapidly through the gate.

10) Water Conservation

Impact: Because water usage would be decreased by up to an anticipated 74 percent (to 77,700 gallons per day), implementation of the proposed Del Mar Highlands Estates project would not have a significant adverse impact on City water supplies. Nonetheless, imported water supplies are limited and the continuing statewide drought watch condition renders water conservation efforts essential to curtail the cumulative effects of development in southern California.

Mitigation: Although significant project-level effects were not assessed based on anticipated water use rates for the 148 lots associated with the Del Mar Highlands Estates development, the following mitigation measures shall be incorporated into project design as follows to address cumulative water usage concerns.

1. Limit grading in areas where no construction is proposed; thereby reducing the need for planting and irrigation of graded areas; (landscaping plans)

2. Provide integrated organic soil amendments in landscaped areas to improve infiltration; (landscaping plans)
3. Reduce runoff potential from landscaped areas by utilizing berming, raised planters, and drip irrigation systems; (landscaping plans)
4. Install soil moisture override systems in all common irrigation areas to avoid sprinkling when the ground is already saturated; (landscaping plans)
5. Identify in the plant materials list in the project design guidelines whether or not plants are native or naturalize easily and incorporate a list of local California sources for native plants; (landscaping plans)
6. Incorporate low-flush toilets, low-flow faucets, and timers on sprinklers (including nighttime watering) into project design; and (building permits)
7. Provide information regarding water conservation measures to new residents at the time of lot purchase. (certificate of occupancy)