

## **New Citro School**

### **EIR Addendum Meadowood Project State Clearinghouse No. 2004051028**

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**MAY 2023**

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## **1 INTRODUCTION**

This document is an Addendum to the previously certified Environmental Impact Report (“EIR”) for the Meadowood Project (“Certified EIR”; State Clearinghouse No. 2004051028), now known as the Citro Development. The Bonsall Unified School District (“District”), acting as lead agency under the California Environmental Quality Act (“CEQA”), proposes acquisition of real property for the development and operation of a new school on a portion of Planning Area 2 (“PA 2”) of the Meadowood Project (“Proposed Project”). The Certified EIR analyzed the potential environmental effects of constructing and operating an elementary school in PA 2. Characteristics of the school, as proposed by the District, have been refined from those previously analyzed in the Certified EIR, including the size of the school site, the school’s attendance boundaries, grade levels, enrollment capacity, site layout, and access points.

This Addendum evaluates whether the environmental effects of the proposed changes to the approved Meadowood Project would require the preparation of a subsequent or supplemental EIR. As documented herein, the Proposed Project would not cause new significant environmental effects or substantially increase the severity of previously identified significant effects disclosed in the Certified EIR. Accordingly, the Proposed Project would not trigger expanded environmental review, beyond this Addendum.

### **1.1 CEQA GUIDELINES**

This Addendum has been prepared in accordance with CEQA (California Public Resources Code, Sections 21000, et seq.) and the State CEQA Guidelines (California Code of Regulations, Title 14, Sections 15000, et seq.).

CEQA Guidelines Sections 15162 through 15164 set forth the criteria for determining the appropriate additional environmental documentation, if any, to be completed when there is a previously certified environmental impact report covering a project for which a subsequent discretionary action is required. CEQA Guidelines Sections 15162(a) and 15163 state that when a negative declaration has been adopted or an EIR certified for a project, no subsequent or supplemental EIR or subsequent negative declaration shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in light of the whole public record, one or more of the following:

- (1) Substantial project changes are proposed that will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
- (2) Substantial changes would occur with respect to the circumstances under which the project is undertaken that require major revisions to the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
- (3) New information of substantial importance that was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified or the negative declaration was adopted shows any of the following:

- (A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration.
- (B) Significant effects previously examined will be substantially more severe than identified in the previous EIR.
- (C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponent declines to adopt the mitigation measures or alternatives.
- (D) Mitigation measures or alternatives that are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponent declines to adopt the mitigation measures or alternatives.

CEQA Guidelines Section 15164(a) states that an addendum to a previously certified EIR may be prepared if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of subsequent or supplemental EIR have occurred. If the conditions listed in CEQA Guidelines Sections 15162, 15163, or 15164 have not occurred or are not met, no changes to the previously certified EIR or previously adopted negative declaration are necessary.

## **1.2 BACKGROUND ON THE PREVIOUSLY CERTIFIED EIR AND OTHER ENVIRONMENTAL DOCUMENTATION**

The proposed school is a part of the County-approved Meadowood Project, which consists of the development of a residential community with a mix of single-family and multifamily units, an elementary school, neighborhood and pocket parks, trails, and supporting infrastructure. The Meadowood Project, as amended, identifies an elementary school in PA 2, a 12.8-acre lot, and assumes that the school would operate with a capacity of approximately 500 kindergarten through 8<sup>th</sup> grade (K-8) seats, including 208 students generated from the Meadowood Project within District boundaries.

The County of San Diego certified the EIR for the Meadowood Project on January 11, 2012 (Appendix A). The Meadowood Project included a General Plan Amendment, Specific Plan Amendment, and Vesting Tentative Map. The Certified EIR concluded that the Meadowood Project would result in significant unmitigable impacts associated with aesthetics, air quality, and transportation/traffic; significant mitigated impacts associated with biological resources, agricultural resources, geology and soils, cultural resources, noise, and hazards/hazardous materials; and less than significant impacts associated with land use, hydrology and water quality, public services, population and housing, mineral resources, and utilities. As a part of the approval process for the Meadowood Project, the San Diego County Board of Supervisors adopted a Statement of Overriding Considerations, pursuant to CEQA Guidelines Section 15091(a)(3), finding the benefits of the Meadowood Project would outweigh the adverse, significant, and unavoidable environmental effects.

Since the approval of the Meadowood Project and certification of the EIR, a number of activities associated with the approved Meadowood Project have occurred. The County has prepared and adopted several addendums to the Certified EIR, including one that updated the Meadowood Vesting Tentative Map (“Updated Plan”). On October 15, 2019, the County Board of Supervisors approved the Updated Plan and related Addendum to the Certified EIR (“2019 Addendum”; see Appendix B). The Updated Plan modified the lot layout and circulation within the originally Approved Project footprint; added an off-site storm drain access road and storm drainpipe outside of the project footprint; redistributed the dwelling units in PAs 1, 3, 4 and 5; changed the locations of parks, trails, and circulation roadways; removed an on-site wastewater treatment plant; modified Certified EIR Mitigation Measure M-GE-2, which originally proposed the removal of boulders with a high potential for rockfall, to the installation of rockfall barriers, instead; and based on the updated lot layout, grading plans, and changes to the County’s noise compatibility levels, eliminated Mitigation Measures M-N-2 (noise protection easement), M-N-3 (noise barrier for the wastewater treatment plant), and previously proposed noise barriers at multifamily planning areas, parks, and the school site. The Updated Plan also increased the size of PA 2 by 0.1 acre to 12.8 acres.

The Meadowood Project, as approved in 2012 and modified in 2019, is referred to as the “Approved Project” in this document.

### **1.3 ADDENDUM PROCESS**

The Bonsall Unified School District is the CEQA lead agency for the Proposed Project. Pursuant to CEQA Guidelines Section 15367, a lead agency has the principal responsibility for carrying out or approving a project that may have a significant effect upon the environment. The District, as the lead agency, has the authority to approve the Proposed Project and its environmental documentation.

As documented herein, the Proposed Project refines the school component of the Approved Project and does not create new or increase the severity of significant adverse environmental effects disclosed in the Certified EIR nor does it require the adoption of new or considerably different mitigation measures or alternatives. Therefore, the District has elected to streamline the CEQA process with the preparation of this Addendum to the Certified EIR. The conditions specified in Section 15162(a) are not present and no changes to the previously Certified EIR are necessary. Therefore, the Proposed Project does not require the preparation of a subsequent or supplemental EIR.

This Addendum is the primary reference document for the formulation and implementation of a mitigation monitoring plan for the Proposed Project. All applicable measures from the mitigation monitoring program approved in conjunction with this Addendum, the Certified EIR, and 2019 Addendum have been incorporated into this document. This Addendum is intended to provide sufficient information to allow the District and any other permitting agencies to evaluate the potential impacts from implementation of the Proposed Project.

## **1.4 CONTENT AND ORGANIZATION OF THIS ADDENDUM**

This Addendum includes the following sections:

- Section 1, Introduction, describes the addendum process and Project background.
- Section 2, Environmental Setting, provides information on the Project Site, existing and surrounding conditions, land use designation and zoning of the Project Site, and background information on the District.
- Section 3, Project Description, describes the Proposed Project activities, improvements, operations, construction, and agency actions.
- Section 4, Environmental Checklist, summarizes the Project characteristics and environmental conditions, presents the environmental resources that would be significantly impacted by the Proposed Project, and states findings as to the type of environmental documentation required for the Proposed Project.
- Section 5, Environmental Analysis, provides a summary of the Certified EIR and 2019 Addendum, an analysis of whether the Meadowood Project, as modified by the Proposed Project, would create new or substantially greater environmental impacts than concluded in the Certified EIR, identifies mitigation measures applicable to the Proposed Project, and states the significance of the environmental resource after mitigation.
- Section 6, Mitigation Monitoring and Reporting, identifies the mitigation measures applicable to the Proposed Project, the entity/agency responsible for implementing and overseeing the successful implementation of the mitigation measures, and when the mitigation measures are to be executed.
- Section 7, References, includes a list of documents cited in the Addendum.
- Section 8, List of Preparers, identifies the persons who contributed to preparation of the Addendum.

## **2 ENVIRONMENTAL SETTING**

### **2.1 PROJECT LOCATION**

The Project Site is east of Horse Ranch Creek Road and south of Shire Court on Lot 54, Tract 5354, Map 16418 of the Meadowood Specific Plan, in the Fallbrook Community Planning Area of unincorporated San Diego County. The Assessor Parcel's Number associated with the Project Site is 108121120; no address currently exists. Regional access is by Interstate 15 (I-15), which is 0.3 miles to the west, and State Route 76 (SR-76), also known as Pala Road, which is 0.4 miles to the south. Figure 1: Regional Location, and Figure 2: Local Vicinity Map, show the Project Site's location from regional and local perspectives.

### **2.2 EXISTING CONDITIONS**

#### **2.2.1 Existing Land Use**

The Project Site encompasses 11.2 acres of the 12.8-acre PA 2 of the Approved Project. The northwest corner of the Site is elevated above Horse Ranch Creek Road and Shire Court by approximately 10 feet. The Site at the end of the Shire Court cul-de-sac is at-grade with the street. The southern end of the Site is also at-grade with Horse Ranch Creek Road. As shown in Figure 3: Site Photographs, Site perimeters along Shire Court and Horse Ranch Creek Road are sloped and landscaped with ornamental vegetation maintained by the Citro Homeowners Association (HOA).

The Project Site consists of a relatively flat, manufactured pad that gently slopes to the south. Elevations across the Site range from a high of approximately 327 feet above mean sea level at the northeast corner of the Site to a low of approximately 279 feet mean sea level at the southwest corner. With exception to the existing perimeter landscaping, the Project Site is void of vegetation. The development footprint of the Project Site is surrounded by a chain-link fence and currently used as a temporary construction materials and equipment storage yard.

The Project Site was rough graded in 2020. Prior to its current condition, the Site was used for dryland farming, from approximately 1939 until 1985, then developed with a residential dwelling and orchards in the northwest corner in approximately 1985, and with more structures by 1989. There are storm drain easements along the northern, western, and eastern perimeters of the Site that drain to two stormwater retention basins, immediately south of the Site.

#### **2.2.2 Surrounding Land Uses**

The Project Site is in an area that has been under construction over the last few years with planned communities, including the Meadowood Project, which the Project Site is within. Improvements immediately surrounding the Project Site include Horse Ranch Creek Road to the west; beyond that is undeveloped land which is part of the Campus Park Specific Plan and proposed for open space. Southwest of the Site is a pocket garden and single-family housing development, which is part of the Approved Project. Residential uses are north of Shire Court. The Site is bordered by Rosemary's Mountain and rural residential development to the east, and the aforementioned stormwater retention basins to the south. Figure 4: Surrounding Uses, shows the conditions of the surrounding uses.



### 2.2.3 Land Use and Zoning

The Project Site is in the Fallbrook Community Planning Area of unincorporated San Diego County. The San Diego County General Plan Designation for the Site is Specific Plan Area. The Site is part of the Meadowood Specific Plan. As shown in Figure 5: Meadowood Specific Plan Land Use Plan, the Project Site is in a portion of PA 2, which has a land use designation of Elementary School and an underlying RV-10 zoning district, which allows residential development at a density of 3.3 dwelling units per acre.

## 2.3 BONSALL UNIFIED SCHOOL DISTRICT

The District, formerly known as Bonsall Union School District, unified on February 26, 2013. It serves an area of 70.5 square miles and is bifurcated by I-15 into eastern and western halves. Table 1: Existing District Schools, lists the five schools operated by the District.

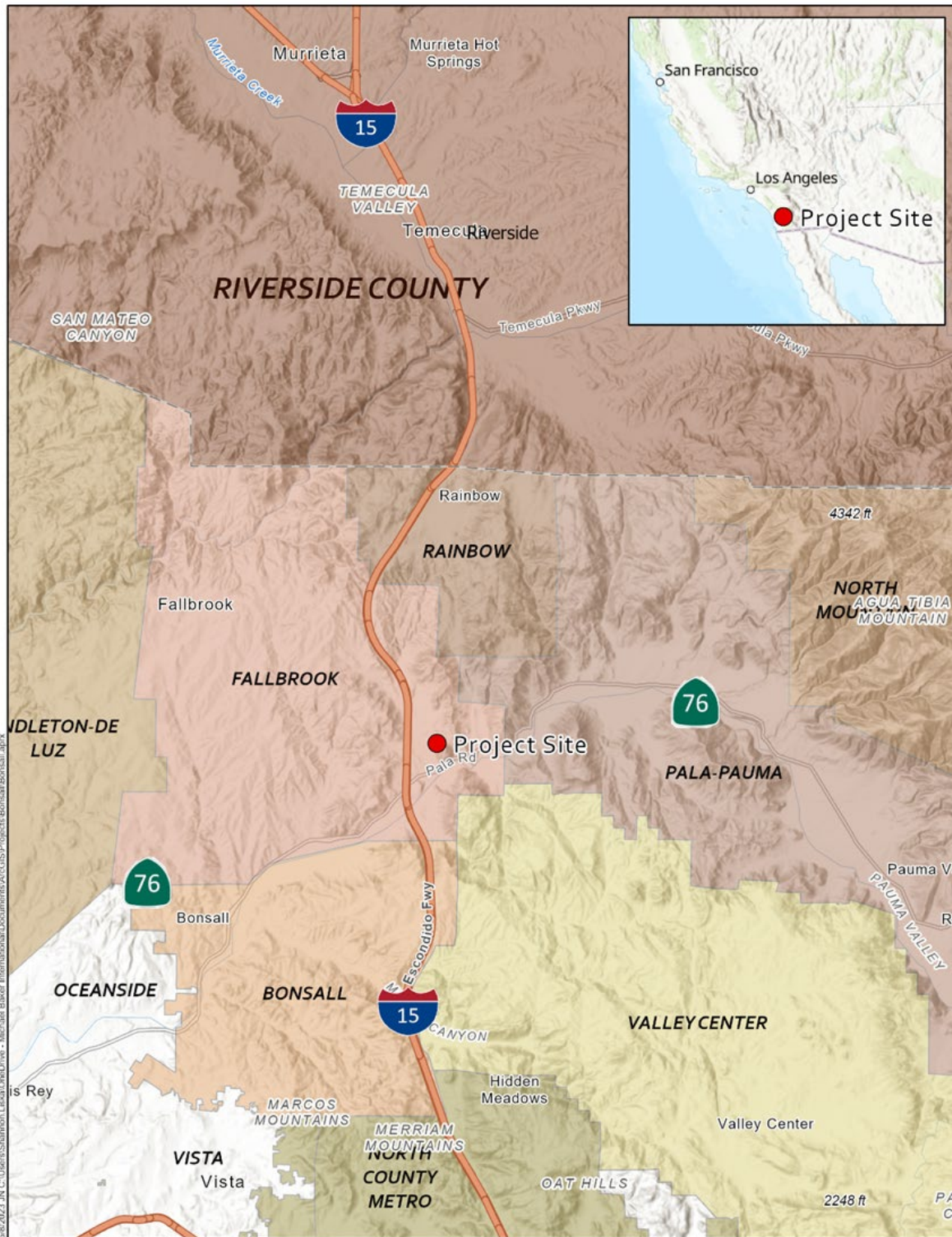
TABLE 1: EXISTING DISTRICT SCHOOLS		
Schools	Grades	Address
1. Bonsall High School	9 – 12	7350 West Lilac Road, Bonsall
2. Sullivan Middle School	6 – 8	7350 West Lilac Road, Bonsall
3. Bonsall Elementary School	TK <sup>1</sup> – 5	31555 Old River Road, Bonsall
4. Bonsall West Elementary School	TK – 6	5050 El Mirlo Drive, Oceanside
5. Vivian Banks Charter School	TK – 5	11800 Pala Mission Road, Pala
1. TK is transitional kindergarten		

As shown in Figure 6: Bonsall Unified School District Boundary and Schools, four of the five District schools are located west of I-15. Vivian Banks is the only school east of the freeway; it is in the northeast corner of the District, on Indian Reservation lands.

The District currently operates an open enrollment program; students in the District can attend their school of choice on a space available basis. The District is exploring options to reconfigure grade levels and create school attendance boundaries for all District schools.

The District, in conjunction with Fallbrook Union Elementary School District and Fallbrook High School District, is also proposing to modify the District's boundaries within the Meadowood Project area. The existing boundaries cut through streets, lots, and housing developments. All three school districts have agreed to redraw the boundaries so that either Bonsall Unified School District or the Fallbrook Districts can accommodate an entire housing development to maintain cohesion among the communities and to create efficient school bus routes and equity between the school districts.

FIGURE 1: REGIONAL LOCATION



Michael Baker  
INTERNATIONAL



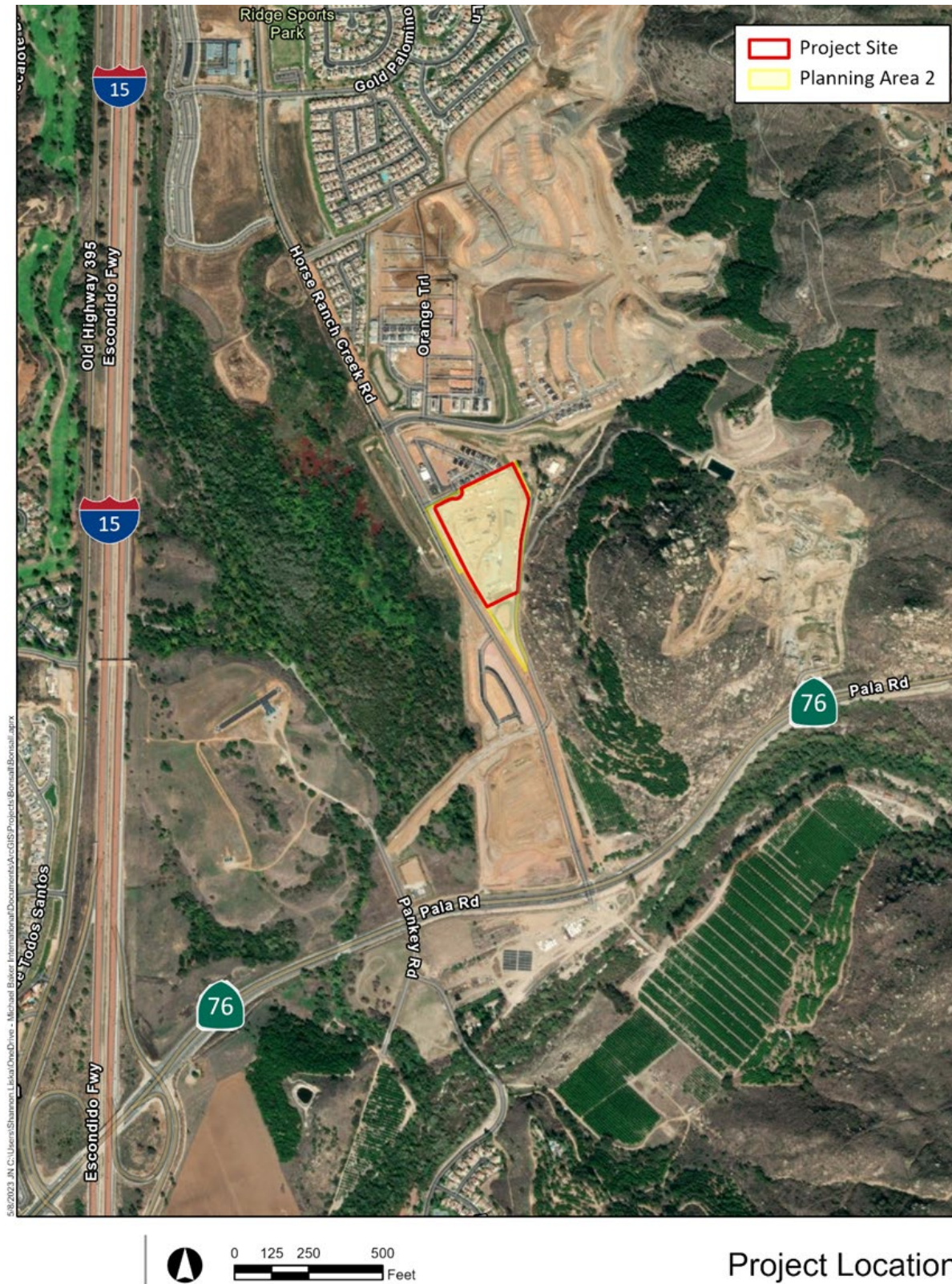
Source: Esri 2022

0 1.5 3  
Miles

Regional Location



FIGURE 2: LOCAL VICINITY MAP





**FIGURE 3: SITE PHOTOGRAPHS**



*View of the Site from the west center, looking east. Image Date: April 20, 2022*

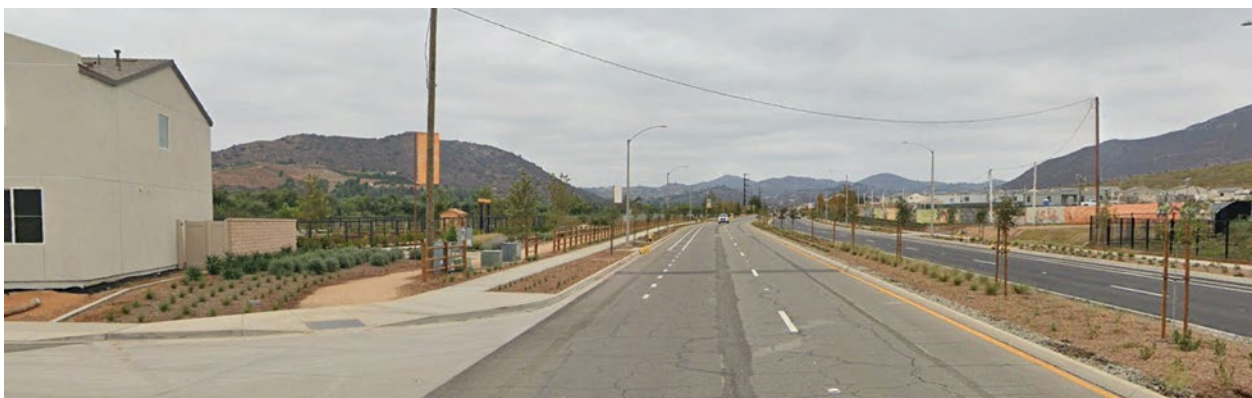


*View of the Site from Horse Ranch Creek Road at Shire Court, facing southeast.  
Image Date: April 20, 2022*

**FIGURE 4: SURROUNDING USES**



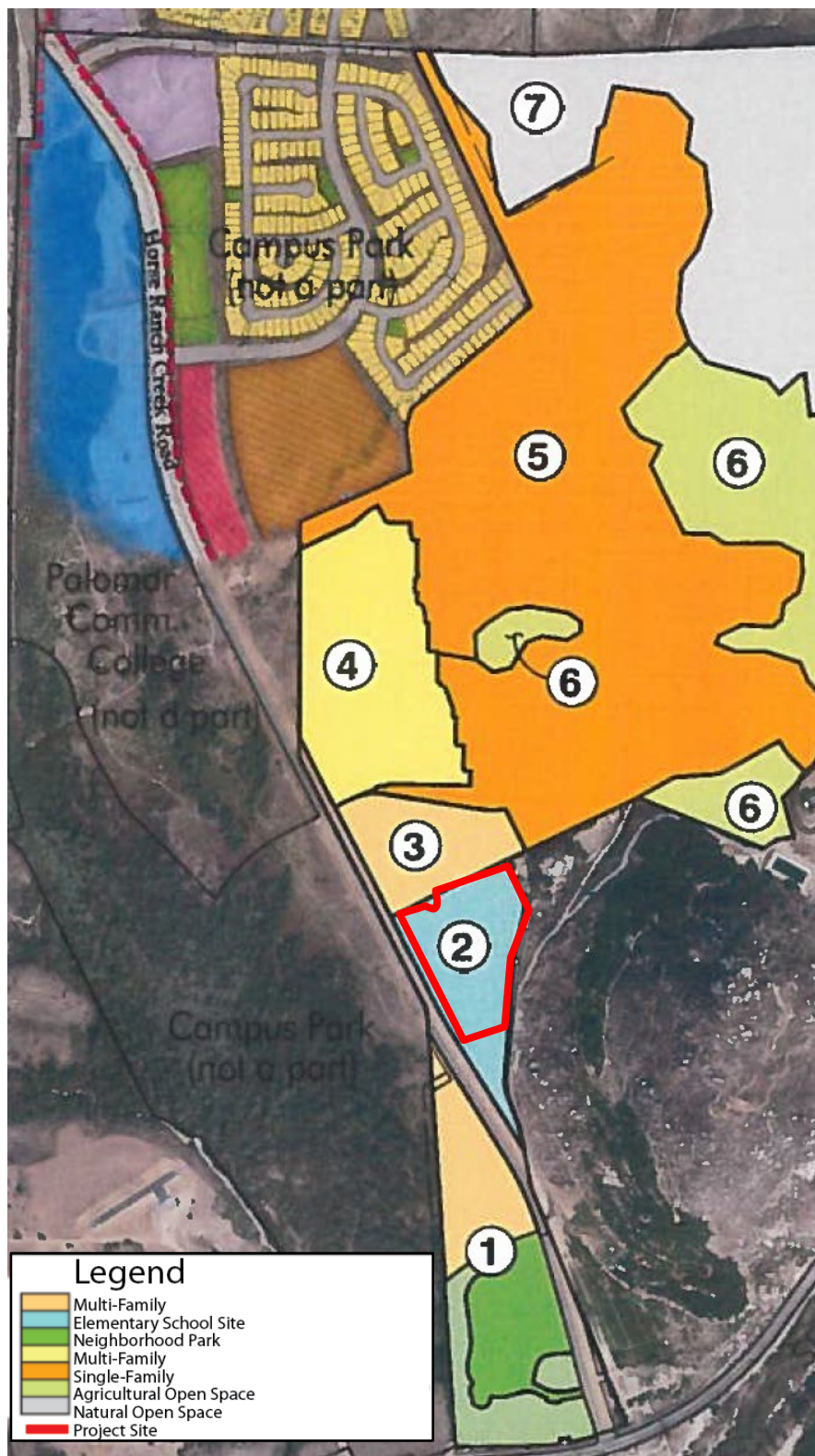
*View of the drainage basin south of the Site. Image Date: April 20, 2022.*



*Facing north on Horse Ranch Creek Road. On the left is a single-family residence and Citro Park. The Project Site and drainage basin are on the right side of the photo. The basin is behind the black fence.*

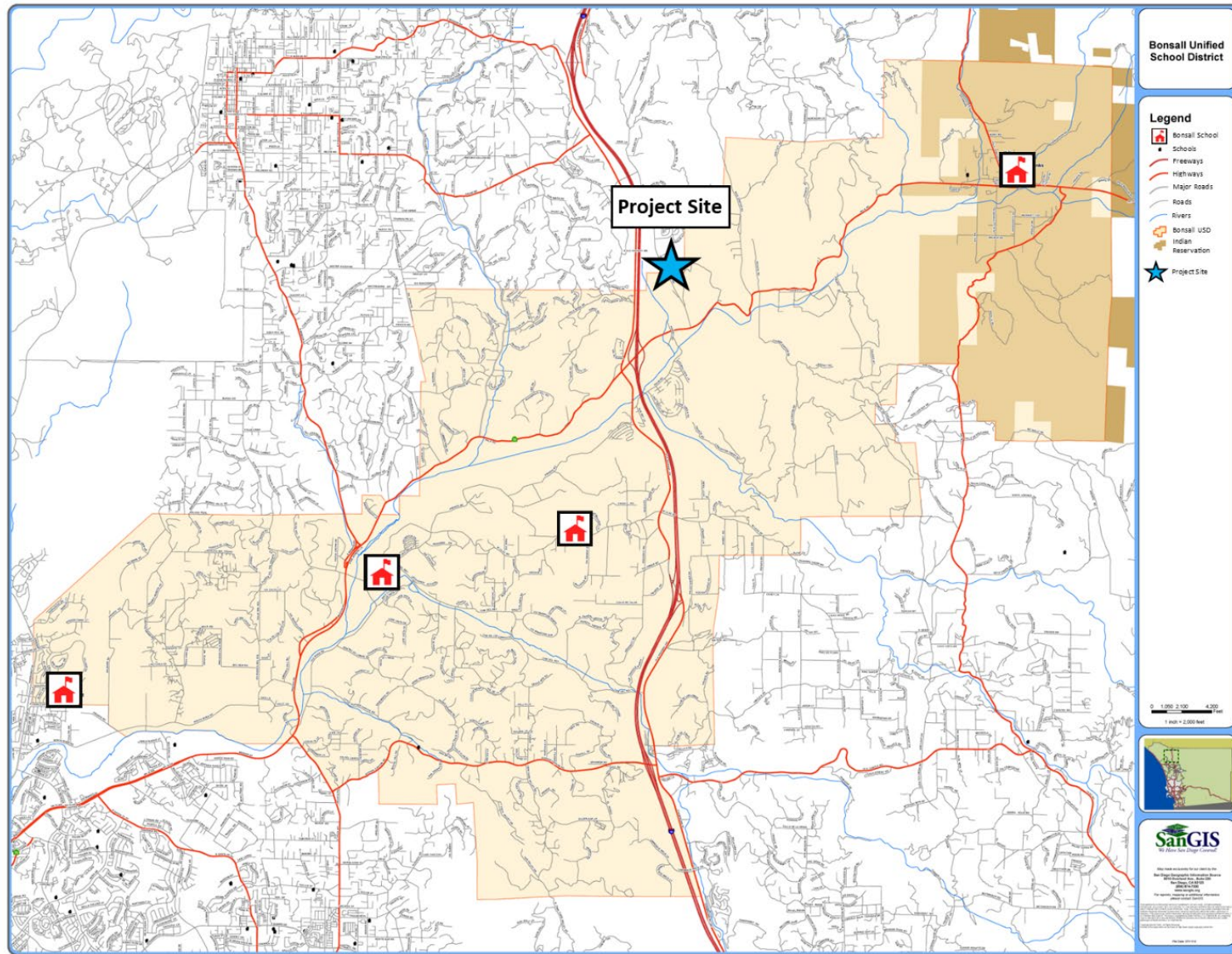


FIGURE 5: MEADOWOOD SPECIFIC PLAN LAND USE PLAN



Source: Meadowood Project Addendum to the Final EIR, October 15, 2019.

FIGURE 6: BONSALL UNIFIED SCHOOL DISTRICT BOUNDARY AND SCHOOLS





## **3 PROJECT DESCRIPTION**

### **3.1 PROPOSED PROJECT MODIFICATIONS**

The District proposes the acquisition of the 11.2-acre Project Site within the Meadowood Project for the construction of a school operating a TK-5, TK-6, or TK-8 program. The proposed school would house District students from the Meadowood Project and areas east of I-15 and north of West Lilac Road. Modifications to the Approved Project, as described herein, affect only PA 2.

#### **3.1.1 District Objectives**

The District has established the following objectives for the Proposed Project:

- Acquire a school site that meets new school selection standards, pursuant to California Code of Regulations, Title 5.
- Construct a new school that will serve District students from the Meadowood Project and areas east of I-15 and north of West Lilac Road.
- Design, construct, and operate state-of-the-art educational facilities that consider student safety and security.

#### **3.1.2 On-site Improvements**

The Proposed Project would comply with the California Building Code and California Green Building Code (CALGreen) for public school construction, as well as the requirements of the Americans with Disabilities Act. Structural improvements are proposed in the northern portion of the Project Site; recreational spaces and surface parking would be in the southern areas.

#### *Campus Layout and Buildings*

The layout of the proposed school dedicates areas for different learning groups—TK/kindergarten (TK/K), younger grades, and older grades—while preserving the feeling of one campus. As shown in Figure 7: Conceptual Site Plan, the TK/K facilities, including a one-story building and outdoor learning and play areas, are proposed in the northeast portion of the campus. The TK/K facilities would be separated from the rest of the campus by fencing. Two two-story classroom buildings would be dedicated for the lower and upper grades. The classroom building for the lower grades would be along the northern perimeter, and the upper grades building would be in the northwest corner. The lower and upper grades classroom buildings would operate their own specialty classrooms and face a courtyard designed to accommodate outdoor learning. As required by the Meadowood Project, the proposed buildings would be set back a minimum of 50 feet from the eastern property line to address wildfire safety.

The administration, multipurpose, and library buildings would each be a single story. The administration building and library would be centrally located on the Project Site, separating the student loading areas, driveways, and parking from the instructional areas. The multipurpose building/gymnasium would be constructed along the western perimeter, south of the upper grades building; together, these two



buildings would act as a barrier from Horse Ranch Creek Road. The multipurpose building would have a small kitchen and be used as the school gymnasium and indoor lunchroom. Fencing would be installed around the main building area for security purposes.

Table 2: Proposed School Buildings, details the proposed facilities and operations. The proposed campus would have approximately 75,500 square feet of building area and operate 30 classrooms.

TABLE 2: PROPOSED SCHOOL BUILDINGS		
Buildings	Size (SF)	Proposed Uses
1. TK/K Classroom (1 Story)	15,400	4 classrooms, teacher workrooms, student and staff restrooms
2. Lower Grades Classroom (2 Stories)	16,500	12 classrooms, 3 specialty classrooms, teacher workrooms, and student restrooms
3. Upper Grades Classroom (2 Stories)	12,600	8 classrooms, 3 specialty classrooms, teacher workrooms, and student restrooms
4. Multipurpose (1 Story)	17,800	Gymnasium (14,400 SF) and Kitchen (3,400 SF); storage
5. Library (1 Story)	4,600	Library, computer labs, meeting rooms, storage
6. Administration (1 Story)	8,600	Administration offices, nurse office, staff lounge, restrooms, meeting spaces, storage

The school buildings would be designed to complement the architecture of the surrounding residential structures, which is consistent with the architectural requirements detailed in the Meadowood Specific Plan's Community Design Element, which limits buildings to two stories and a 35-foot maximum height limit. Fencing would be installed around the classroom building area to deter students from leaving the campus during school hours.

### *Outdoor Facilities*

An outdoor lunch shelter would be provided east of the multipurpose building, and the lower-grade recess area would be between the lunch shelter and administration building. The upper-grade athletic facilities, including a natural turf multipurpose field and basketball courts, would be along the western perimeter, south of the multipurpose building. Nighttime field lighting is not proposed. The outdoor recreational uses would have a higher fence for ball containment.

### *Pedestrian Access*

Several points of entry would be provided for pedestrian access into the school building area. The administration building would be the "front door" of the campus. Access gates are also proposed at the student and bus loading areas. Direct access from the neighborhood would be available from a gated entrance at Shire Court in the northwest portion of the campus. All access gates would close after the morning bell and reopen when school lets out. During the school day, the only entrance would be through the administration building.

### *Vehicle Access and Parking*

Two vehicle access points would be provided. An ingress-only driveway is proposed from Shire Court. The driveway would be one way and include two lanes along the northeast and eastern perimeters. The driveway would fork into a two-lane loading area near the TK/K building and school library in the northeast portion of the campus; school bus loading would also occur at this location. The driveway would continue to the southern portion of the campus, towards the school parking lot with 108 stalls and a longer curbside loading area in front of the administration building. The number of parking stalls is compliant with San Diego County provisions for parking for junior high or middle schools as outlined in Section 6764 of the County's Zoning Ordinance, which requires 1 parking space per employee and 10 for visitors. The multiple drop-off zones would minimize potential vehicle stacking. All vehicles would be required to exit the campus at the southern end of the parking lot and, due to a raised median on Horse Ranch Creek Road, turn right. The southern driveway would not generally be used for inbound traffic flow, but could be made available for bus, emergency vehicle, and maintenance vehicle access. Bike racks would be provided near the pedestrian entry on Shire Court and near the administration building.

### *Landscaping*

Landscaping exists along the western and northern perimeters of the Project Site, adjacent to Horse Ranch Creek Road and Shire Court. These areas are within an easement, maintained by the Citro HOA with "Zone A" landscaping, which includes irrigated drought-tolerant and irrigated fire-resistant ground covers and shrubs. The Citro HOA will also maintain a 70-foot-wide area, immediately east of the Project Site with "Zone B" landscaping, which will include nonflammable native plants, low-growing (12 inches in height), low fuel-volume ground cover vegetation or native grass, and low-growing (maximum height 15 feet) fire-resistant trees. The Proposed Project would not modify these easements and areas.

The Proposed Project would include landscaping throughout the campus, including in the parking lot, around proposed buildings, and in the outdoor learning areas. Trees, shrubs, groundcovers, and other vegetation selected will be from an approved list for the Meadowood Project (Appendix C), which has been developed for fire management goals.

### *Sustainable Features*

The proposed school would include the following CALGreen sustainable features:

- Building oriented to maximize daylighting and minimize the need for artificial lights.
- Increased insulation values in walls and attic spaces.
- Installation of high-efficiency windows and doors.
- Installation of efficient heating, ventilation, and air conditioning systems for all building spaces.
- Use of Energy Star appliances.
- Installation of water-efficient plumbing fixtures for toilets and sinks.
- Installation of tankless water heater systems.
- Installation of light-emitting diode technology for all interior and exterior building areas.

- Use of recycled water for common area landscape irrigation.
- Use of drought-tolerant plants in landscape design to minimize irrigation on-site.
- Installation of water-efficient irrigation systems with smart sensor controls.
- Installation of electric vehicle charging stations.
- Installation of solar panels.

### *Utilities and Drainage*

A system of dry and wet utilities would be installed on the Project Site, including potable and recycled water lines, sewer lines, storm drains, electrical, and communication lines. The utility systems would be connected to the existing infrastructure under Horse Ranch Creek Road and Shire Court.

The Project would include a combination of biofiltration basins, tree wells, and modular wetland systems installed throughout the campus to provide stormwater treatment without restricting site usage. The tree wells would collect runoff while providing shade, and the underground basins and modular systems would be lined with an impermeable liner, as needed, and sized to accommodate the required design capture volume and hydromodification volumes and treat stormwater in accordance with County of San Diego requirements.

#### **3.1.3 Off-site Improvements**

To facilitate pedestrian access to the school, the Project proposes painting two crosswalks at the Horse Ranch Creek Road and Shire Court intersection yellow for high visibility: on the south side of Horse Ranch Creek Road and across Shire Court. In coordination with the San Diego County Public Works Department, standard school area warning signs would be installed along Horse Ranch Creek Road. The signage would comply with the relevant standards in the California Department of Transportation's (Caltrans) "Traffic Controls for School Areas" manual. Prior to the opening of the proposed school, the County may install other traffic control features, including speed limit signs and roadway markings, to warn drivers of the school. Project implementation would not require any other off-site improvements.

#### **3.1.4 Project Operations**

The proposed school would offer one of three programs—TK-5, TK-6, or TK-8—and operate an enrollment capacity of up to 650 seats, which is approximately 150 seats more than that studied in the Certified EIR. The school would accommodate students residing east of I-15 and north of West Lilac Road and follow the District's standard school calendar, generally from August to June. As needed, summer programs could be offered at the campus. School hours would be from approximately 8:00 AM to 3:00 PM; teachers and staff may arrive an hour before and leave an hour after school hours. The school would offer evening and nighttime school events, including but not limited to back-to-school night, open house, talent shows, and awards ceremonies. When not used by the school or District, the proposed school facilities would be available for community use pursuant to the Civic Center Act.<sup>1</sup>

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<sup>1</sup> California Education Code Section 38130 et seq., known as the Civic Center Act, state that every public school in the state must make available a "civic center" for community use.

### **3.1.5 Project Construction**

The District would acquire the Project Site after the California Department of Education approves the site as suitable for public school construction and when mutually agreeable terms are reached in the purchase contract between the District and landowner. Construction of the school would commence soon after the Division of the State Architect approves the Project's building and construction plans. For the purposes of this Addendum, it is assumed construction would start the first quarter of 2027, and last approximately 18 months, and that the proposed school would open in fall 2028.

Project implementation would require ground improvements below building structures proposed in areas with young alluvial materials that were left in place during the previous grading activities. The administration building, kitchen, and portions of the TK/K classroom building, library, and multipurpose building would require aggregate piers of compacted stone installed to depths up to 45 feet below ground surface to increase bearing pressure and mitigate potential settlement under the structural footings. In building areas where ground improvement is not considered necessary, overexcavation would be performed to a depth of 4 feet below the proposed grade. Lightly loaded upright structures, such as flagpoles and signposts, would be designed in accordance with California Building Code standards. The Project will incorporate all recommendations of the geotechnical study (Appendix D) and any subsequent geotechnical recommendations to ensure the Project complies with the California Building Code for public school construction.

Once the site is improved, building construction would take about 13 months. Due to the Project's location within a Very High Fire Hazard Zone, the Proposed Project would also comply with Chapter 7A of the California Building Code, which prescribes building materials and construction methods to minimize the intrusion of flames and burning embers and overall wildfire exposures.

The Project will implement the following construction best management practices (BMPs) and adopted regulations:

- » A construction traffic control plan, required by the San Diego County Department of Public Works, would be prepared prior to the start of construction. The plan would manage potential adverse traffic impacts and ensure construction workers and the general public are protected from traffic hazards that may arise from construction activity.
- » The Proposed Project would comply with State Water Resources Control Board's Construction General Permit (Order No. 20009-009-DWQ), which would require the District and/or its construction contractor to prepare a Storm Water Pollution Prevention Plan (SWPPP). The SWPPP would identify BMPs to control and reduce construction-related pollutants from discharging into waterways. The BMPs would address erosion control, perimeter control, wind erosion control, storm drain inlet protection, tracking control, and general site management.

Construction staging and laydown would occur on the Project Site. The entire Site would be fenced with green screening, and fiber rolls would be placed along the interior perimeters of the fenced areas. All existing storm drain inlets would be protected, and the driveways providing construction access would be stabilized and installed with a tire wash.

- » The Proposed Project would be subject to rules and regulations enforced by the San Diego Air Pollution Control District (SDAPCD), which would limit the release of construction-related pollution into the air and waterways.
  - Rule 50, Visible Emissions: Establishes limits to the opacity of emissions within the SDAPCD.
  - Rule 51, Nuisance: Prohibits emissions that cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public; or which endanger the comfort, repose, health, or safety of any such persons or the public; or which cause injury or damage to business or property.
  - Rule 52, Particulate Matter: Establishes limits to the discharge of any particulate matter from nonstationary sources.
  - Rule 54, Dust and Fumes: Establishes limits to the amount of dust or fumes discharged into the atmosphere in any single hour.
  - Rule 55, Fugitive Dust Rule: Requires implementation of the below measures to minimize fugitive dust emissions.
    1. No person shall engage in construction or demolition activity in a manner that discharges visible dust emissions into the atmosphere beyond the property line for a period or periods aggregating more than 3 minutes in any 60-minute period.
    2. Visible roadway dust, as a result of active operations, spillage from transport trucks, erosion, or track-out/carry-out, shall be minimized by the use of any of the equally effective track-out/carryout and erosion control measures listed in Rule 55 that apply to the project or operation. These measures include track-out grates or gravel beds at each egress point; wheel-washing at each egress during muddy conditions; soil binders, chemical soil stabilizers, geotextiles, mulching, or seeding; watering for dust control; and using secured tarps or cargo covering, watering, or treating of transported material for outbound transport trucks. Erosion control measures must be removed at the conclusion of each workday when active operations cease, or every 24 hours for continuous operations.
  - Rule 67.0.1, Architectural Coatings: Requires manufacturers, distributors, and end users of architectural and industrial maintenance coatings to reduce volatile organic compounds (VOC) emissions from the use of these coatings, primarily by placing limits on the VOC content of various coating categories.
  - Rule 67.7, Cutback and Emulsified Asphalts: Prohibits the sale and use of cutback and emulsified asphalt materials for the paving, construction, or maintenance of parking lots, driveways, streets, and highways that exceed the County standards for the percent by volume of VOC which evaporate into the atmosphere under temperate conditions.

### 3.2 PROJECT ACTIONS/ APPROVALS

This Addendum to the Certified EIR is intended to enable the District, as the lead agency, and other agencies, including the County of San Diego and other interested parties, make informed decisions with respect to the potential changes in the environmental effects of the overall Approved Project. Table 3: Project Approvals and Activities, lists the anticipated approvals required for the Proposed Project.

TABLE 3: PROJECT APPROVALS AND ACTIVITIES	
Agency	Actions
Bonsall Unified School District (Lead Agency)	Adoption of findings for acquisition of the Project Site, pursuant to Public Resources Code Section 21151.8  Adoption of the Addendum to the Meadowood Project EIR (SCH #2004051028) and Approval of the Proposed Project
County of San Diego (Responsible Agency)	Approval of District's proposed acquisition of the Project Site, pursuant to Public Resources Code Section 21151.2  Approval of grading, roadway, and drainage plans and improvements
San Diego Regional Water Quality Control Board (Responsible Agency)	Approval of National Pollutant Discharge Elimination System (NPDES) Permit and SWPPP
California Department of Education, School Facilities and Transportation Services Division (Reviewing Agency)	Approval of School Site Selection, Design, and Educational Programs
California Department of General Services, Division of the State Architect (Reviewing Agency)	Approval of Building and Construction Plans



FIGURE 7: CONCEPTUAL SITE PLAN



New Citro School- Preliminary Planning

HMC Architects

## **4 ENVIRONMENTAL CHECKLIST**

### **4.1 BACKGROUND**

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**1. Project Title:** New Citro School

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**2. Lead Agency Name and Address:**

Bonsall Unified School District  
31505 Old River Road  
Bonsall, California 92003

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**3. Contact Person and Phone Number:**

Laura Castro, Executive Director, Business and Administrative Services  
760.631.5200

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**4. Project Location:**

The Project Site encompasses County Assessor Parcel's Number 108121120, east of Horse Ranch Creek Road and south of Shire Court on Lot 54, Tract 5354, Map 16418 of the Meadowood Specific Plan, in the Fallbrook Community Planning Area of unincorporated San Diego County.

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**5. Project Sponsor's Name and Address:**

Bonsall Unified School District  
31505 Old River Road  
Bonsall, California 92003

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**6. General Plan Designation:** San Diego County General Plan Land Use Designation: (21) Specific Plan Area: Meadowood Specific Plan

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**7. Zoning:** Elementary School (with underlying RV-10 Zoning District for residential development at a density of 3.3 dwelling units per acre)

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**8. Description of Project:**

The Proposed Project involves the acquisition of an approximately 11.2-acre lot for the development and operation of a TK-5, TK-6, or TK-8 school campus with a maximum enrollment capacity of 650 seats.

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**9. Surrounding Land Uses and Setting:**

West of Horse Ranch Creek Road is undeveloped land that is part of the Campus Park Specific Plan, proposed as open space. Southwest of the Project Site is a pocket garden and single-family housing development that is part of the Approved Project. Residential development is north of the Project Site. The Project Site is bordered by Rosemary's Mountain and rural residential uses to the east, and drainage basins to the south.

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**10. Other Public Agencies Whose Approval Is Required:**

San Diego County Department of Public Works – Drainage, Grading, and Roadway  
San Diego Regional Water Quality Control Board – NPDES Permit and SWPPP



## 4.2 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a “Potentially Significant Impact,” as indicated by the checklist on the following pages.

- |   |  |  |
|---|--|--|
| <input type="checkbox"/> Aesthetics                         | <input type="checkbox"/> Agricultural and Forest Resources | <input type="checkbox"/> Air Quality                 |
| <input type="checkbox"/> Biological Resources               | <input type="checkbox"/> Cultural Resources                | <input type="checkbox"/> Geology / Soils             |
| <input type="checkbox"/> Greenhouse Gas Emissions           | <input type="checkbox"/> Hazards & Hazardous Materials     | <input type="checkbox"/> Hydrology / Water Quality   |
| <input type="checkbox"/> Land Use / Planning                | <input type="checkbox"/> Mineral Resources                 | <input type="checkbox"/> Noise                       |
| <input type="checkbox"/> Population / Housing               | <input type="checkbox"/> Public Services                   | <input type="checkbox"/> Recreation                  |
| <input type="checkbox"/> Transportation / Traffic           | <input type="checkbox"/> Tribal Cultural Resources         | <input type="checkbox"/> Utilities / Service Systems |
| <input type="checkbox"/> Mandatory Findings of Significance |  |  |

## 4.3 DETERMINATION (TO BE COMPLETED BY THE LEAD AGENCY)

On the basis of this initial evaluation:

☐ I find that the Proposed Project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☐ I find that although the Proposed Project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the Proposed Project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the Proposed Project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☒ I find that although the Proposed Project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the Proposed Project, nothing further is required.

\_\_\_\_\_  
*Signature*

Laura Castro  
\_\_\_\_\_  
*Printed Name*

\_\_\_\_\_  
*Date*

Bonsall Unified School District  
\_\_\_\_\_  
*For*

## **5 ENVIRONMENTAL ANALYSIS**

Summaries of the environmental impacts of the Certified EIR and as modified by the 2019 Addendum are provided for each environmental topic evaluated in the Certified EIR, followed by the Proposed Project's impacts and a determination on whether the Project or circumstances would require changes to the Certified EIR or if there is new information causing potentially new or increased impacts not discussed in the Certified EIR or are substantially more severe than discussed in the Certified EIR. Mitigation measures from the Certified EIR and modified in 2019 Addendum are listed, updated, and refined, as necessary, to reflect the Proposed Project and any new circumstances. Changes to the mitigation measures are shown in ~~strikeout text~~ to indicate deletions and underline text to signify additions and will be incorporated into the final mitigation monitoring program for the Proposed Project.

### **5.1 AESTHETICS**

#### **5.1.1 Summary of Impacts in the Certified EIR and 2019 Addendum**

The Certified EIR analyzed aesthetics impacts in Section 2.1. Six key issues were addressed:

- Issue 1, Change in Visual Patterns. The Certified EIR determined that through the application of design guidelines, as contained in the Community Design Element of the Meadowood Specific Plan Amendment, the Approved Project would result in less than significant visual impacts. However, short-term visual impacts caused by construction would be significant and unmitigable.
- Issue 2, Change in Visual Quality: The Certified EIR determined that the conservation of natural habitat as permanent open space, sensitive grading, clustering of homes, conservation of major drainages, and retention of existing groves would reduce impacts to the quality of existing visual resources to less than significant.
- Issue 3, Change in Visual Environment of Scenic Highway/Vista: The Certified EIR determined that impacts of the Approved Project from public viewing areas would be less than significant with the implementation of the Specific Plan's architectural and design guidelines.
- Issues 4 and 5, Light and Glare. The Certified EIR concluded that through compliance with the County Light Pollution Code and design guidelines within the Meadowood Specific Plan that lighting impacts would be less than significant.
- Issue 6, Conformance with Regulations. The Certified EIR determined that compliance with applicable state and County visual goals and policies would reduce impacts related to conformance with regulations to less than significant.

The Certified EIR determined that the Approved Project when combined with related projects in the area would change the aesthetic composition of the area from undeveloped and agricultural to suburban and therefore would result in cumulatively considerable impacts on the visual character of the viewshed and public views from the surrounding areas and trails. Cumulative impacts would be significant and unmitigable.

The 2019 Addendum determined that the Updated Plan would not create new significant effects not discussed in the Certified EIR or impacts that were substantially more severe than those identified in the Certified EIR.

### 5.1.2 Impacts Associated with the Proposed Project

Since the Certified EIR, have there been any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause one or more effects to aesthetic resources including: scenic vistas; scenic resources including, but not limited to, trees, rock outcroppings, or historic buildings within a state scenic highway; existing visual character or quality of the site and its surroundings; or day or nighttime views in the area?

Yes  
☐

No  
☒

The Project involves the construction of a school in PA 2, which was planned for an elementary school. Project implementation would not alter the planned development as approved in the Certified EIR. As such, the Project would not result in new or increased impacts to the visual character or quality of public views of the Meadowood Project. Moreover, the proposed school buildings would be within the allowed height limit of two stories and 35 feet, as specified in the Meadowood Specific Plan Community Design Element.

According to the Caltrans California State Scenic Highway System Map, there are no officially designated scenic highways in the vicinity of the Project Site. The proposed school would be constructed in PA 2, which was considered in the visual analysis of the Certified EIR, which determined that views from I-15 and other public roadways and trails would not be adversely affected from implementation of the Meadowood Project. Moreover, the design of the proposed school would comply with the San Diego County I-15 Corridor Scenic Preservation Guidelines (Appendix E).

There are no new lighting sources proposed beyond those anticipated in the Certified EIR. The Proposed Project would comply with the outdoor lighting standards contained in the County of San Diego Code Light Pollution Code (Sections 59.108–59.110). The Project Site is in Zone B, outside of a 15-mile radius of the Palomar Observatory and Mount Laguna Observatory, and will comply with Section 59.105, Requirement for Lamp Source and Shielding of the County Light Pollution Code. The proposed school does not include nighttime lighting of the fields. Campus security lighting would be shielded and directed away from adjacent light sensitive uses, including the west-facing side of Rosemary's Mountain, as required under Certified EIR Mitigation Measure M-BR-12. The Proposed Project would conform to all applicable regulations and plans regarding light pollution. Compliance with these standards would ensure the proposed school would not create a new source of substantial light or glare.

Project impacts to aesthetics would not be greater than those analyzed in the Certified EIR, and no mitigation measures would be required.

### 5.1.3 Adopted Mitigation Measures Applicable to the Proposed Project

No mitigation measures were identified in the Certified EIR, and the Proposed Project does not require any mitigation for aesthetic resources.

### 5.1.4 Level of Significance After Mitigation

The Proposed Project would result in less than significant impacts to aesthetics, and impacts would not be greater than those identified in the Certified EIR.

## 5.2 AGRICULTURE AND FORESTRY RESOURCES

### 5.2.1 Summary of Impacts in the Certified EIR and 2019 Addendum

The Certified EIR analyzed impacts to agricultural resources in Section 4.7. The Certified EIR used the California Agricultural Land Evaluation and Site Assessment (LESA) Model to analyze the direct impacts that would result from the conversion of agricultural lands to non-agricultural. The LESA analysis yielded a score that indicated the Approved Project Site would not represent a significant agricultural resource. The Certified EIR determined that there were no Williamson Act contract lands within the Approved Project area. The analysis concluded that the Approved Project would not have a significant impact on agricultural resources, and it would not have the potential to contribute to a cumulative impact.

The 2019 Addendum determined that the Updated Plan would not create new significant effects not discussed in the Certified EIR or impacts that were substantially more severe than those identified in the Certified EIR.

### 5.2.2 Impacts Associated with the Proposed Project

Since the previous EIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause one or more effects to agriculture or forestry resources including: conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to a non-agricultural use, conflicts with existing zoning for agricultural use or Williamson Act contract, or conversion of forest land (as defined in Public Resources Code section 12220(9)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

Yes

☐

No

☒

According to the Department of Conservation Farmland Mapping and Monitoring Program, the Project Site is classified as Farmland of Local Importance. It is not classified as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Moreover, the Project Site is rough graded and vacant and does not contain any agricultural uses.

According to the Certified EIR, the Project Site is not currently nor has historically been within a designated agricultural preserve or Williamson Act contract. There are no Williamson Act contract lands within or

adjacent to the Project Site. The zoning for the Site is RV-10, which does not conflict with zoning for an agricultural use.

No forestlands or timberlands as defined in Public Resources Code Sections 12220(g) or 4526 or Government Code Section 51104(g) would be impacted by the Proposed Project. Additionally, the Project Site is not zoned for forestland, would not result in rezoning of forestland or timberland, and would not result in the loss of forestland or conversion of forest land to non-forest use.

There is no farmland, agricultural uses, or forestland within the boundary of the Project Site. Implementation of the Proposed Project would not result in the loss of or conversion of such land to non-agricultural or non-forest uses. Project impacts on agriculture and forestry resources would not be greater than those analyzed in the Certified EIR, and no mitigation measures would be required.

### **5.2.3 Adopted Mitigation Measures Applicable to the Proposed Project**

No mitigation measures were identified in the Certified EIR, and the Proposed Project would not require any mitigation.

### **5.2.4 Level of Significance After Mitigation**

The Proposed Project would result in no impacts to agriculture and forestry resources, and impacts would not be greater than those identified in the Certified EIR.

## **5.3 AIR QUALITY**

### **5.3.1 Summary of Impacts in the Certified EIR and 2019 Addendum**

Impact analysis of air quality is provided in Section 2.2 of the Certified EIR. Four issues concerning air quality were analyzed:

- Issue 1, San Diego Regional Air Quality Strategy/State Implementation Plan (RAQS/SIP) Consistency. The Certified EIR determined that the Approved Project would conflict with the RAQS since it would result in the construction of housing at densities that were inconsistent with the adopted San Diego County General Plan and Fallbrook Community Plan. Thus, impacts associated with conflicts with the RAQS would be significant and unmitigable.
- Issue 2, Air Quality Standards. The Certified EIR concluded that operational emissions of reactive organic gases (ROG) and particulates (PM<sub>10</sub>) would exceed air quality standards, and impacts would be significant and unmitigable, even with implementation of Mitigation Measure M-AQ-3. Short-term construction air quality impacts would be reduced to less than significant levels through project design features and Mitigation Measure M-AQ-2.
- Issue 3, Sensitive Receptors. The Certified EIR concluded that health risks related to the use of heavy-duty diesel equipment during construction would generate significant levels of diesel particulate matter that would be reduced to less than significant levels with Mitigation Measure M-AQ-4 and M-AQ-6.

- Issue 4, Odors. The Certified EIR determined that odors associated with the on-site wastewater treatment plant and use of recycled water would not result in a significant impact.

The Certified EIR found that the Approved Project, considered with nearby related projects, would result in cumulatively considerable conflicts with the RAQS/SIP and operational impacts related to ROG and PM<sub>10</sub> emissions. Cumulative impacts would be significant and unmitigable.

The 2019 Addendum determined that the Updated Plan would not create new significant effects not discussed in the Certified EIR or impacts that were substantially more severe than those identified in the Certified EIR.

### 5.3.2 Impacts Associated with the Proposed Project

Since the previous EIR was certified or previous Negative Declaration was adopted, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause one or more effects to air quality including: conflicts with or obstruction of implementation of the San Diego RAQS or applicable portions of the SIP; violation of any air quality standard or substantial contribution to an existing or projected air quality violation; a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard; exposure of sensitive receptors to substantial pollutant concentrations; or creation of objectionable odors affecting a substantial number of people?

Yes  
☐

No  
☒

Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations.

The analysis in this section is based in part on the following technical report:

- Air Quality and Greenhouse Gas Emissions Assessment for the Bonsall Unified School District Citro School Project. San Diego County, California. ECorp Consulting, Incorporated. February 2023.

A complete copy of the study is included in Appendix F of this Addendum.

Since certification of the Meadowood Project's EIR, the RAQS has been updated several times, and emissions from the Meadowood Project, and those anticipated with the proposed school, have been accounted for. Nonetheless, air quality impacts of the Proposed Project, which include the changes to the Approved Project (as discussed below) would be below the San Diego Air Pollution Control District's (SDAPCD) significance thresholds. Therefore, the Proposed Project would not exceed assumptions in the RAQS/SIP or conflict with or obstruct implementation of the RAQS/SIP.

Construction of the proposed school would require additional ground improvements. The air quality modeling completed for the Proposed Project analyzed the additional earthwork associated with the ground improvements and found that short-term construction emissions, including nonattainment and criteria pollutants, would not exceed SDAPCD significance thresholds. Nonetheless, the Project would

implement Certified EIR Mitigation Measure M-AQ-2, which requires the use of interior paint with a VOC content less than or equal to 50 grams per liter and exterior coating with a content less than or equal to 250 grams per liter. Long-term emissions caused by the expanded school operations (e.g., increased enrollment capacity and refined attendance boundary) would not create nonattainment and criteria pollutants that would exceed SDAPCD thresholds. The Proposed Project would not violate air quality standards, increase the Approved Project's contribution to regional concentrations of nonattainment pollutants, result in a significant contribution to the adverse health impacts associated with criteria pollutants, or result in a cumulatively considerable net increase of emissions for which the region is nonattainment under an applicable federal or state ambient air quality standard.

Construction and operation of the proposed school would not result in significant levels of toxic air contaminants that would elevate health effects. Moreover, the District would implement Certified EIR Mitigation Measures M-AQ-4 and M-AQ-6, which require the use of Toxic-Best Available Control Technology (T-BACT) and ensure that 10 percent of the construction fleet uses any combination of diesel catalytic converters, diesel oxidation catalysts, diesel particulate filters, and/or California Air Resources Board (CARB) certified Tier I, II, or III equipment. Therefore, Project emissions would not result in significant concentrations of pollutants at nearby sensitive receptors, including the residential uses to the north and southwest of the Project Site.

Construction of the Proposed Project may generate short-term, localized odors. These would be generally confined to the Project area and would not adversely affect a substantial number of people. Additionally, the Proposed Project does not contain any land uses that are typically associated with emissions of objectionable odors.

There would not be a new or substantially more severe significant impact compared with the significance determination in the Certified EIR. Proposed Project impacts to air quality would not be greater than those analyzed in the Certified EIR.

### **5.3.3 Adopted Mitigation Measures Applicable to the Proposed Project**

The following mitigation measures were identified in the Certified EIR. The applicability of each mitigation measure has been evaluated. Where appropriate, applicable mitigation measures have been modified to reflect the Proposed Project.

- ~~M-AQ-1. The Proposed Project was not considered in SANDAG growth projections used as a basis for RAQS and the SIP. While the Proposed Project contains smart growth features, which would serve to reduce motor vehicle use, a major goal of the RAQS Transportation Control Measures (TCMs), this would not eliminate this inconsistency with RAQS for the SDAB. This inconsistency can only be rectified when SANDAG updates the RAQS based on the growth projections after the Proposed Project has been approved.~~
- M-AQ-2. During the architectural coatings (painting) phase of construction, the applicant school district and/or its construction contractor shall use interior coatings with a VOC content less than or equal to 50 grams per liter; ~~residential exterior coatings with a content less~~



than or equal to 100 grams per liter; and non-residential exterior and interior coatings with a content less than or equal to 250 grams per liter.

M-AQ-3. ~~The Proposed Project design would promote walking and, bicycle riding, and horseback riding as alternative forms of transportation to motorized vehicles and would reduce the projected operational emissions. However, this will not completely reduce emissions to a level below significance. No additional feasible mitigation is available, thus impacts would remain significant and unmitigable.~~

M-AQ-4. To utilize Toxic-Best Available Control Technology (T-BACT) and mitigate for impacts, the applicant school district and/or its construction contractor shall ensure that 10 percent of the construction fleet uses any combination of diesel catalytic converters, diesel oxidation catalysts, diesel particulate filters and/or CARB certified Tier I, II, or III equipment.

M-AQ-5. ~~The Proposed Project was not considered in SANDAG growth projections used as a basis for RAQS and the SIP. While the Proposed Project contains smart growth features, which would serve to reduce motor vehicle use, a major goal of the RAQS TCMs, this would not eliminate this inconsistency with RAQS for the SDAB. This inconsistency can only be rectified when SANDAG updates the RAQS based on the growth projections after the Proposed Project has been approved.~~

M-AQ-6. To ensure the use of T-BACT and mitigate for impacts, the applicant school district and/or its construction contractor shall have 10 percent of the construction fleet use any combination of diesel catalytic converters, diesel oxidation catalysts, diesel particulate filters and/or CARB certified Tier I, II, or III equipment

M-AQ-7. ~~There is no feasible mitigation available to reduce this impact, thus impacts would be significant and unmitigable.~~

#### 5.3.4 Level of Significance After Mitigation

Mitigation Measures M-AQ-2, M-AQ-4, and M-AQ-6 in the Certified EIR, as modified above, are applicable to the Proposed Project. With implementation of these mitigation measures, Proposed Project impacts would be less than significant and not be greater than those identified in the Certified EIR.

### 5.4 BIOLOGICAL RESOURCES

#### 5.4.1 Summary of Impacts in the Certified EIR and 2019 Addendum

Biological resources are analyzed in Certified EIR Section 3.1. The analysis discussed permanent direct and on-site impacts, as well as temporary, indirect, and off-site impacts on special-status species, including threatened and endangered wildlife species, and nesting birds; riparian habitat and sensitive natural communities; jurisdictional waters including wetlands; and local policies, ordinances and adopted plans. Mitigation measures M-BR-1 through M-BR-20, as well as design considerations, were identified to reduce



impacts to less than significance on arroyo toads, California gnatcatcher, least Bell's vireo, southwestern willow flycatcher, western spadefoot, birds of prey, raptors and nests of species and their habitat, including coastal sage scrub, southern mixed chaparral, coast live oak, non-native grassland, pastureland, willow/mule fat scrub, southern arroyo willow riparian forest, and freshwater marsh; and jurisdictional wetlands.

The 2019 Addendum noted that the Biological Open Space Easement and Agricultural Preserve Easement were dedicated at the time of the 2019 Addendum. It identified potential impacts of grading an off-site storm drain. Impacts of the storm drain were identified and addressed in agency permits. The 2019 Addendum also identified an additional permanent impact to 0.1 acre of coastal sage scrub that was mitigated by an excess of 45.5 acres of permanent preservation of coastal sage scrub on-site. The 2019 Addendum identified a number of mitigation measures from the Certified EIR that apply, including M-BR-13, M-BR-5b, and M-BR-7b. With implementation of the identified mitigation measures, the 2019 Addendum identified less than significant impacts to biological resources. No new mitigation measures were identified.

#### 5.4.2 Impacts Associated with the Proposed Project

Since the previous EIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause one or more effects to biological resources including: adverse effects on any sensitive natural community (including riparian habitat) or species identified as a candidate, sensitive, or special status species in a local or regional plan, policy, or regulation, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service; adverse effects to federally protected wetlands as defined by Section 404 of the Clean Water Act; interference with the movement of any native resident or migratory fish or wildlife species or with wildlife corridors, or impeding the use of native wildlife nursery sites; and/or conflicts with the provisions of any adopted Habitat Conservation Plan, Natural Communities Conservation Plan, or other approved local, regional or state habitat conservation plan, policies or ordinances?

Yes  
☐

No  
☒

As shown in Figure 3 and Figure 4, the Project Site is rough graded and heavily disturbed with operations of the Meadowood Project's construction materials and equipment storage yard. With the exception of the northern and western perimeters, which contain HOA-maintained landscaping, the Project Site is void of any vegetation. Immediately west of the Project Site is Horse Ranch Creek Road; beyond that is undeveloped land which is designated as open space in the Campus Park Specific Plan. North of the Project Site is developed with Shire Court and residential uses. South of the Project Site are two drainage basins that would be maintained by the HOA. East of the Project Site is a 70-foot-wide area that would be maintained by the Citro HOA to establish fire defensible/fuel modification spaces.

The areas east of the Project Site, including within the 70-foot-wide buffer, contain natural vegetation and communities, including disturbed coastal sage scrub. Coastal sage scrub is critical habitat for the federally threatened California gnatcatcher, and, as shown in Figure 8: Critical Habitat in Project Vicinity, the areas east of the Project Site and west of Horse Ranch Creek Road are identified as critical habitat for the

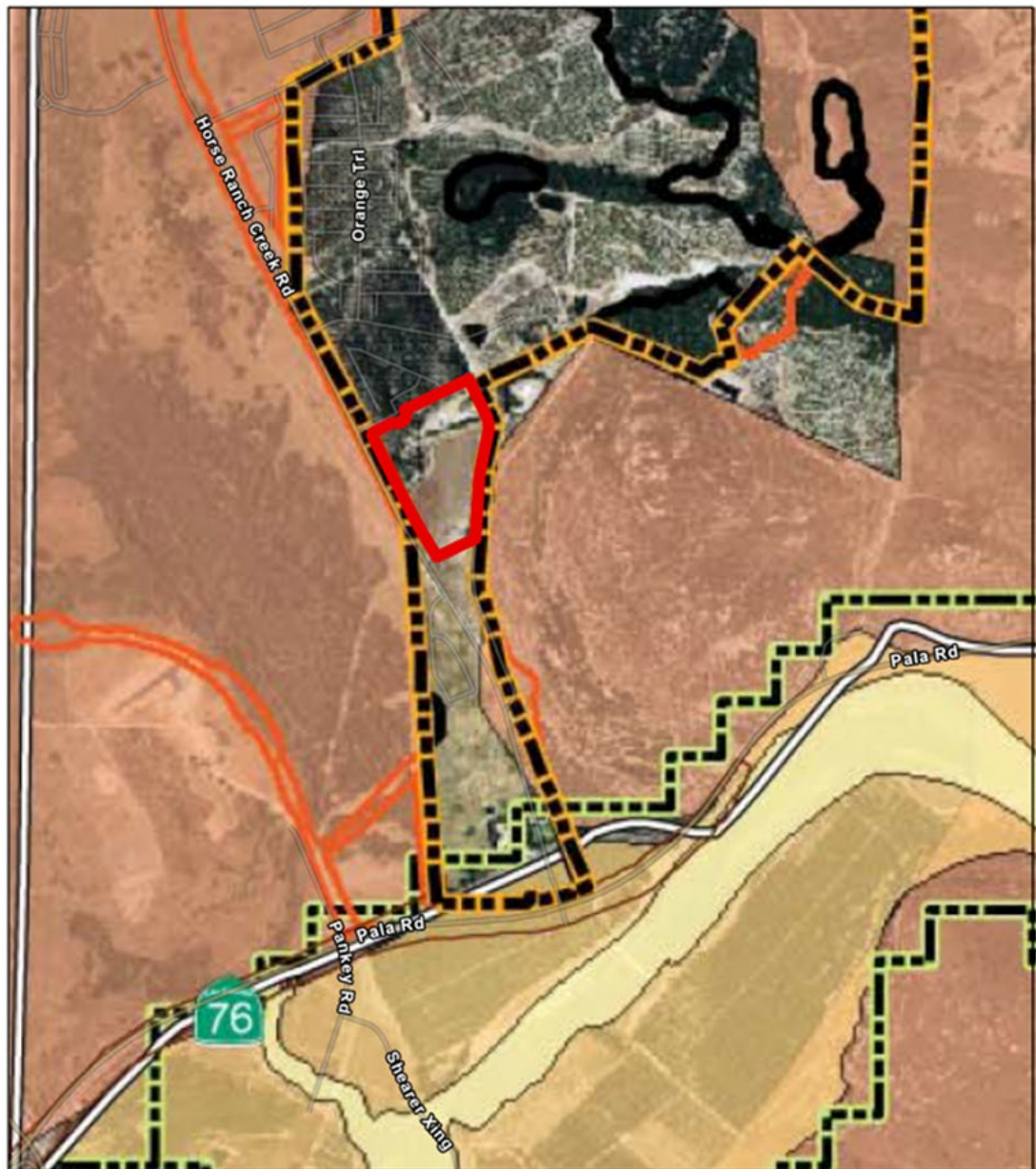
California gnatcatcher. Although the Certified EIR did not identify the stormwater basins to the south of the Project Site as containing any sensitive or critical habitat supporting special status species, the basins provide water for wildlife and can support species known to exist in the area.

Due to the Project Site's disturbed condition and lack of vegetation, Project implementation would not directly modify sensitive habitat or impact wildlife. However, short-term construction activities—including noise, vibration, and potential nighttime lighting for security of construction equipment—and long-term operation of the proposed building and parking lot lights would indirectly impact wildlife that may exist east and south of the Project Site. Such wildlife may include the California gnatcatcher and other foraging, breeding, and nesting birds protected by the Migratory Bird Treaty Act, including least Bell's vireo and southwestern willow flycatcher, which have been identified in the area. Therefore, Project implementation would require implementation of Certified EIR Mitigation Measures M-BR-3a, which mitigates potential indirect impacts to California gnatcatcher; M-BR-11, which mitigates impacts on birds protected by the Migratory Bird Treaty Act; and M-BR-12, which mitigates lighting impacts on wildlife near the edge of open space. Implementation of the above mitigation measures would reduce potentially significant indirect impacts at off-site areas.

The Project Site is void of any riparian habitat or other sensitive natural communities, including wetlands. There are no designated wildlife corridors on or adjacent to the Project Site. Any potential wildlife movement (mostly migratory birds) from the mountainside on the east, open space west of Horse Ranch Creek Road, and the stormwater basins on the south would not be inhibited from Project development. The Proposed Project would have less than significant impacts to state and federally protected wetlands, sensitive habitat and communities, and wildlife corridors. The Project would not conflict with local policies or ordinances protecting biological resources or adopted conservation plans.

Project implementation would not cause new or substantially more severe significant impacts to biological resources compared with the significance determination in the Certified EIR.

FIGURE 8: CRITICAL HABITAT IN PROJECT VICINITY



### 5.4.3 Adopted Mitigation Measures Applicable to the Proposed Project

The following mitigation measures were identified in the Certified EIR. Applicability of each mitigation measure has been evaluated. The mitigation measures have been modified where appropriate to reflect the Proposed Project.

~~M-BR 1. To mitigate indirect construction related impacts on the arroyo toad, the owner/permittee shall, using a qualified biologist, implement the following mitigation measure(s):~~

~~a. The project biologist shall meet with the owner, permittee or designee, and the construction crew to conduct an on-site educational session regarding the need to avoid impacts outside of the approved development area and identify locations for placement of protective fencing. The project biologist shall continue to monitor grading activities.~~

~~b. During grading activities, Best Management Practices for erosion control shall be implemented and monitored as needed to prevent any significant sediment transport. These practices may include, but may not be limited to, the following: the use of materials such as sandbags; sediment fencing and erosion control matting to stabilize disturbed areas; and installation of erosion control materials, particularly on the downslope side of disturbed areas, to prevent soil loss.~~

~~c. All construction activities shall take place only inside the fenced area. Grading materials shall be stored either inside the fenced development area or in an area approved by the project biologist.~~

~~d. A storm drain system and detention basins shall be constructed to restrict excess water flow from proposed roads and structures associated with the Meadowood project. Filter devices shall be installed at the appropriate points to ensure that run-off is cleansed before reaching the basins. All water-catchment features shall be located above graded and natural slopes.~~

~~e. Nighttime lighting shall be shielded and directed away from riparian and upland habitat adjacent to the development.~~

~~M-BR 2. Permanent direct impacts to a total of 14.5 acres on and off site, of suitable habitat for California gnatcatcher shall be mitigated on-site at a ratio of 2:1 for a total of 29.0 acres. If Palomar Community College mitigates for impacts associated with Horse Ranch Creek, this would reduce impacts to gnatcatcher habitat by 0.7 acre and mitigation by 1.4 acres for a total mitigation requirement of 27.6 acres. A total of 74.5 acres of habitat shall be preserved in the proposed on-site open space easement. The mitigation land will also cover impacts to designated Critical Habitat for the California gnatcatcher as detailed in the Conceptual Resource Management Plan (Appendix F-3).~~

~~Temporary direct impacts to a total of 0.3 acre on- and off-site shall be mitigated through revegetation of the coastal sage scrub with the same species present within the impact area. The revegetation areas are shown on the Conceptual Landscape Plan.~~

~~Take authorization of the California gnatcatcher and removal of coastal sage scrub habitat shall be obtained through the Section 7 Consultation with the USFWS or through the County Habitat Loss Permit Ordinance and compliance with the Coastal Sage Scrub NCCP.~~

M-BR-3a. Indirect impacts on the California gnatcatcher shall be mitigated by the following measures to be implemented by the project applicant a qualified biologist:

a. The project biologist shall meet with the owner, permittee or designee, and the construction crew to conduct an onsite educational session regarding the need to avoid impacts outside of the approved development area.

b. During grading activities, Best Management Practices for erosion control shall be implemented and monitored as needed to prevent any significant sediment transport. These practices may include, but may not be limited to, the following: the use of materials such as sandbags; sediment fencing and erosion control matting to stabilize disturbed areas; and installation of erosion control materials, particularly on the downslope side of disturbed areas, to prevent soil loss.

c. All construction activities shall take place only inside the fenced area. Grading materials shall be stored either inside the fenced development area or in an area approved by the project biologist.

d. Nighttime lighting shall be shielded and directed away from coastal sage scrub habitat adjacent to the development. This shall be implemented through a Lighting Plan.

~~e. Permanent fencing and signage shall be placed along the trails and/or between the development/open space interface in order to be compliant with County standards and as shown on the Landscape Concept Plans.~~

~~M-BR-3b. Direct impacts on the California gnatcatcher shall be mitigated by the following measures to be implemented by the project applicant:~~

~~a. Direct impacts to California gnatcatcher shall be mitigated in accordance with M-BR-2.~~

~~b. A qualified biologist shall supervise the placement of orange construction fencing or equivalent along the boundary of the development area as shown on the approved grading plans. The location and design for fencing will be recommended and subsequently installed by a qualified biologist.~~



~~c. To avoid impacts to nesting gnatcatchers, vegetation clearing and grubbing within 500 feet of coastal sage scrub shall not occur in potential nesting habitat during the breeding season from February 15 through August 31. If project construction (other than clearing and grubbing of sensitive habitats) is necessary adjacent to preserved on- and off-site habitat during the gnatcatcher breeding (or sooner if a Wildlife Agency-approved biologist demonstrates to the satisfaction of the Wildlife Agencies that all nesting is complete), a Wildlife Agency-approved biologist shall conduct pre-construction surveys in the adjacent habitat to determine the location of any active gnatcatcher nests in the area. The survey shall begin no more than three days prior to the beginning of construction activities. The Agencies shall be notified if any nesting birds are found. During construction, no activity shall occur within 500 ft (152.4 m) of active gnatcatcher nesting territories, unless measures are implemented to minimize the noise and disturbance to those adjacent birds. Exceptions to this measure includes cases where surveys confirm that adjacent habitat is not occupied or where noise studies confirm that construction noise levels are below 60 dBA hourly Leq along the edge of adjacent habitat. If construction activities are not completed prior to the breeding season and noise levels exceed this threshold, noise barriers shall be erected to reduce noise impacts to occupied habitat to below 60 dBA hourly Leq and/or the culpable activities will be suspended until the end of the breeding season.~~

~~M-BR-4. Impacts to least Bell's vireo habitat shall be mitigated at a ratio of 3:1 for a total of 11.1 acres to be purchased off-site. This mitigation shall be incorporated into the Section 7 consultation. The habitat will be a southern willow scrub or willow riparian forest habitat which can be occupied by least Bell's vireo as detailed in the Conceptual Wetlands Mitigation Plan. If Palomar Community College mitigates for impacts associated with Horse Ranch Creek, this would reduce impacts to southwestern willow flycatcher habitat by 0.7 acres and mitigation by 2.1 acres for a total mitigation requirement of 9.1 acres. This mitigation shall be incorporated into the Section 7 consultation.~~

~~Temporary direct impacts to 2.2 acres shall be mitigated through revegetation of the riparian habitat with the same species present within the impact area. The revegetation areas are shown on the Conceptual Landscape Plan.~~

~~M-BR-5a. Indirect impacts to least Bell's vireo shall be mitigated by the following measures to be implemented by the project applicant:~~

~~a. The project biologist shall meet with the owner, permittee or designee, and the construction crew to conduct an on-site educational session regarding the need to avoid impacts outside of the approved development area.~~

b. During grading activities, Best Management Practices for erosion control shall be implemented and monitored as needed to prevent any significant sediment transport. These practices may include, but may not be limited to, the following: the use of materials such as sandbags; sediment fencing and erosion control matting to stabilize disturbed areas; and installation of erosion control materials, particularly on the downslope side of disturbed areas, to prevent soil loss.

c. All construction activities shall take place only inside the fenced area. Grading materials shall be stored either inside the fenced development area or in an area approved by the project biologist.

d. Nighttime lighting shall be shielded and directed away from riparian habitat adjacent to the development. This shall be implemented through a Lighting Plan.

M-BR-5b. ~~Direct impacts to least Bell's vireo shall be mitigated by the following measures to be implemented by the project applicant:~~

a. ~~Direct impacts to least Bell's vireo habitat shall be mitigated in accordance with M-BR-4.~~

b. ~~A qualified biologist shall supervise the placement of orange construction fencing or equivalent along the boundary of the development area as shown on the approved grading plans. The location and design for fencing will be recommended and subsequently installed by a qualified biologist.~~

c. ~~To avoid impacts to nesting vireos, vegetation clearing and grubbing shall not occur within 500 feet of riparian habitat during the breeding season from March 15 to September 15. If project construction (other than clearing and grubbing of sensitive habitats) is necessary adjacent to preserved on- and off-site habitat during the vireo breeding (or sooner if a Wildlife Agency approved biologist demonstrates to the satisfaction of the Wildlife Agencies that all nesting is complete), a Wildlife Agency approved biologist shall conduct pre-construction surveys in the adjacent habitat to determine the location of any active vireo nests in the area. The survey shall begin not more than three days prior to the beginning of construction activities. The Agencies shall be notified if any nesting vireos are found. During construction, no activity shall occur within 500 ft (152.4m) of active vireo nesting territories, unless measures are implemented to minimize the noise and disturbance to those adjacent birds. Exceptions to this measure includes cases where surveys confirm that adjacent habitat is not occupied or where noise studies confirm that construction noise levels are below 60 dBA hourly Leq along the edge of adjacent habitat. If construction activities are not completed prior to the breeding season and noise levels exceed this threshold, noise barriers shall be erected to reduce noise impacts to occupied~~

~~habitat to below 60 dBA hourly Leq and/or the culpable activities will be suspended.~~

~~M-BR-6. Impacts to southwestern willow flycatcher habitat shall be mitigated at a ratio of 3:1 for a total of 11.1 acres to be purchased off site as detailed in the Conceptual Wetlands Mitigation Plan (Appendix F 4). If Palomar Community College mitigates for impacts associated with Horse Ranch Creek, this would reduce impacts to southwestern willow flycatcher habitat by 0.7 acres and mitigation by 2.1 acres for a total mitigation requirement of 9.1 acres. This mitigation shall be incorporated into the Section 7 consultation.~~

~~Temporary direct impacts to 2.2 acres of suitable habitat shall be mitigated through revegetation of the riparian habitat with the same species present within the impact area. The revegetation areas are shown on the Conceptual Landscape Plan.~~

~~M-BR-7a. Indirect impacts on the southwestern willow flycatcher shall be mitigated by the following measures to be implemented by the project applicant:~~

~~a. The project biologist shall meet with the owner, permittee or designee, and the construction crew to conduct an on-site educational session regarding the need to avoid impacts outside of the approved development area.~~

~~b. During grading activities, Best Management Practices for erosion control shall be implemented and monitored as needed to prevent any significant sediment transport. These practices may include, but may not be limited to, the following: the use of materials such as sandbags; sediment fencing and erosion control matting to stabilize disturbed areas; and installation of erosion control materials, particularly on the downslope side of disturbed areas, to prevent soil loss.~~

~~c. All construction activities shall take place only inside the fenced area. Grading materials shall be stored either inside the fenced development area or in an area approved by the project biologist.~~

~~d. Nighttime lighting shall be shielded and directed away from riparian habitat adjacent to the development. This shall be implemented through a Lighting Plan.~~

~~M-BR-7b. Direct impacts on the southwestern willow flycatcher shall be mitigated by the following measures to be implemented by the project applicant:~~

~~a. Direct impacts to southwestern willow flycatcher habitat shall be mitigated in accordance with M-BR-6.~~

~~b. A qualified biologist shall supervise the placement of orange construction fencing or equivalent along the boundary of the development area as shown on the approved grading plans. The location and design for fencing will be recommended and subsequently installed by a qualified biologist.~~



~~c. To avoid impacts to nesting southern willow flycatchers, vegetation clearing and grubbing within 500 feet of riparian habitat shall not occur from May 1 to September 1. If project construction (other than clearing and grubbing of sensitive habitats) is necessary adjacent to preserved on- and off-site habitat during the flycatcher breeding (or sooner if a Wildlife Agency-approved biologist demonstrates to the satisfaction of the Wildlife Agencies that all nesting is complete), a Wildlife Agency-approved biologist shall conduct pre-construction surveys in the adjacent habitat to determine the location of any active flycatcher nests in the area. The survey shall begin not more than three days prior to the beginning of construction activities. The Agencies shall be notified if any nesting flycatchers are found. During construction, no activity shall occur within 500 ft (152.4 m) of active flycatcher nesting territories, unless measures are implemented to minimize the noise and disturbance to those adjacent birds. Exceptions to this measure includes cases where surveys confirm that adjacent habitat is not occupied or where noise studies confirm that construction noise levels are below 60 dBA hourly Leq along the edge of adjacent habitat. If construction activities are not completed prior to the breeding season and noise levels exceed this threshold, noise barriers shall be erected to reduce noise impacts to occupied habitat to below 60 dBA hourly Leq and/or the culpable activities will be suspended~~

M-BR-8. ~~Permanent direct impacts to 62.2 acres of foraging habitat for birds of prey and other special status species shall be mitigated through preservation of 122.4 acres of open space on-site within a regional open space network as detailed in the Conceptual Resource Management Plan (Appendix F-3).~~

~~Temporary impacts would be mitigated through revegetation of foraging habitat with the same plant species found within the impact area. The revegetation areas are shown on the Conceptual Landscape Plan.~~

~~Indirect impacts shall be mitigated by the following measures:~~

- ~~a. Shielding lighting away from the open space.~~
- ~~b. Monitoring noise levels during construction.~~
- ~~c. Use of range construction fencing, and silt fencing.~~
- ~~d. Permanent fencing and signage shall be placed along the trails and/or between the development open space interface in order to be compliant with County standards and as shown on the Landscape Concept Plans.~~

M-BR-9. ~~Impacts to the western spadefoot shall be mitigated by the purchase of 11.1 acres of riparian forest and scrub habitat and the 122.4 acres of open space on-site within a~~

~~regional open space network as detailed in the Conceptual Resource Management Plan (Appendix F-3). If Palomar Community College mitigates for impacts associated with Horse Ranch Creek, this would reduce impacts to western spadefoot habitat by 0.7 acres and mitigation by 2.1 acres for a total mitigation requirement of 9.1 acres.~~

~~Additionally, prior to project grading, a written relocation plan shall be prepared and approved by the County and CDFG. In accordance with the plan, western spadefoot toads shall be trapped and relocated. The timing and duration of the relocation program will be based on the activity period of the western spadefoot (generally associated with rainfall and temperature) and proposed construction schedule.~~

~~Trapping will occur along the existing pitfall traps located along the western and southern property boundaries and monitored prior to and during proposed construction activities. Any western spadefoot found in the traps will be collected, noted and relocated to predetermined receptor sites within the region. Trapping and relocation shall be conducted by a biologist familiar with the biological natural history of the western spadefoot and possesses a CDFG Memorandum of Understanding (MOU) for conducting these activities. At the end of the relocation effort, the biologist will prepare a summary report noting the number of western spadefoot relocated, the location of the area to which they were moved, and other pertinent facts. The report shall be submitted to the County and CDFG.~~

M-BR-10. ~~Permanent and temporary impacts to the 14 special status wildlife species identified on-site shall be mitigated through preservation of 122.4 acres of open space on-site within a regional open space network as detailed in the Conceptual Resource Management Plan (Appendix F-3).~~

M-BR-11. Impacts to nesting birds shall be mitigated through the following measures:

a. Native and naturalized vegetation clearing shall not occur during the breeding season from -February 15 to September 15; However, Project construction activities may occur within this period with written concurrence from the District Director of the Department of Planning and Land Use (DPLU), the US Department of Fish and Wildlife (USFWS), and the California Department of Fish and Wildlife (CDFW) ~~CDFG~~ that nesting birds would be avoided. If vegetation removal is to take place during the nesting season, a biologist shall be present during vegetation clearing operations to search for and flag active nests so that they can be avoided.

b. To avoid impacts to nesting raptors, any vegetation clearing or grubbing within 500 feet of trees suitable for raptor nesting shall not occur from February 1 to July 15. However, Project construction activities may occur within this period with written concurrence from the District Director of the Department of Planning and

~~Land Use (DPLU)~~, the USFWS, and the ~~CDFG~~ CDFW that nesting birds would be avoided. A County-approved biologist shall conduct pre-construction surveys in the adjacent habitat to determine the location of any active raptor nests in the area. The survey shall begin not more than ten days prior to the beginning of construction activities. During construction, no activity shall occur within 500 ft (152.4 m) of active raptor nests, unless measures are implemented to minimize the noise and disturbance to those adjacent birds. The District and/or its construction contractor ~~project proponent~~ may seek approval from the ~~Director of the Department of Planning and Land Use (DPLU)~~ USFWS or CDFW if nesting activities cease prior to July 15.

c. Potential impacts to nesting California gnatcatcher, least Bell's vireo, and southern willow flycatcher will be implemented through agency permitting and with M-BR-3b(c), M-BR-5b(c), and M-BR-7b(c), as follows.

M-BR-3b(c). To avoid impacts to nesting gnatcatchers, vegetation clearing and grubbing within 500 feet of coastal sage scrub shall no occur in potential nesting habitat during the breeding season from February 15 through August 31. If project construction (other than clearing and grubbing of sensitive habitats) is necessary adjacent to preserved on and off-site habitat during the gnatcatcher breeding (or sooner if a Wildlife Agency-approved biologist demonstrates to the satisfaction of the Wildlife Agencies that all nesting is complete), a Wildlife Agency approved biologist shall conduct pre-construction surveys in the adjacent habitat to determine the location of any active gnatcatcher nests in the area. The survey shall begin not more than three days prior to the beginning of construction activities. The Agencies shall be notified if any nesting birds are found. During construction, no activity shall occur within 500 ft (152.4 m) of active gnatcatcher nesting territories, unless measures are implemented to minimize the noise and disturbance to those adjacent birds. Exceptions to this measure includes cases where surveys confirm that adjacent habitat is not occupied or where noise studies confirm that construction noise levels are below 60 dBA hourly Leq along the edge of adjacent habitat. If construction activities are not completed prior to the breeding season and noise levels exceed this threshold, noise barriers shall be erected to reduce noise impacts to occupied habitat to below 60 dBA hourly Leq and/or the culpable activities will be suspended until the end of the breeding season.

M-BR-5b(c). To avoid impacts to nesting vireos, vegetation clearing and grubbing shall not occur within 500 feet of riparian habitat during the breeding season from March 15 to September 15. If project construction (other than clearing and grubbing of sensitive habitats) is necessary adjacent to preserved

on- and off-site habitat during the vireo breeding (or sooner if a Wildlife Agency-approved biologist demonstrates to the satisfaction of the Wildlife Agencies that all nesting is complete), a Wildlife Agency-approved biologist shall conduct pre-construction surveys in the adjacent habitat to determine the location of any active vireo nests in the area. The survey shall begin not more than three days prior to the beginning of construction activities. The Agencies shall be notified if any nesting vireos are found. During construction, no activity shall occur within 500 ft (152.4 m) of active vireo nesting territories, unless measures are implemented to minimize the noise and disturbance to those adjacent birds. Exceptions to this measure includes cases where surveys confirm that adjacent habitat is not occupied or where noise studies confirm that construction noise levels are below 60 dBA hourly Leq along the edge of adjacent habitat. If construction activities are not completed prior to the breeding season and noise levels exceed this threshold, noise barriers shall be erected to reduce noise impacts to occupied habitat to below 60 dBA hourly Leq and/or the culpable activities will be suspended.

M-BR-7b(c). To avoid impacts to nesting southern willow flycatchers, vegetation clearing and grubbing within 500 feet of riparian habitat shall not occur from May 1 to September 1. If project construction (other than clearing and grubbing of sensitive habitats) is necessary adjacent to preserved on- and off-site habitat during the flycatcher breeding (or sooner if a Wildlife Agency-approved biologist demonstrates to the satisfaction of the Wildlife Agencies that all nesting is complete), a Wildlife Agency approved biologist shall conduct pre-construction surveys in the adjacent habitat to determine the location of any active flycatcher nests in the area. The survey shall begin not more than three days prior to the beginning of construction activities. The Agencies shall be notified if any nesting flycatchers are found. During construction, no activity shall occur within 500 ft (152.4 m) of active flycatcher nesting territories, unless measures are implemented to minimize the noise and disturbance to those adjacent birds. Exceptions to this measure includes cases where surveys confirm that adjacent habitat is not occupied or where noise studies confirm that construction noise levels are below 60 dBA hourly Leq along the edge of adjacent habitat. If construction activities are not completed prior to the breeding season and noise levels exceed this threshold, noise barriers shall be erected to reduce noise impacts to occupied habitat to below 60 dBA hourly Leq and/or the culpable activities will be suspended.

- M-BR-12. General indirect impacts associated with external community lighting shall be mitigated through all communal lighting associated with the project will be shielded and directed away from the urban/natural edge. The Proposed Project shall be designed to be in

compliance with the San Diego County Light Pollution Code (Sections 59.101-59.115). A lighting plan shall be included in the grading plans which shows required lighting adjacent to the open space as being shielded, unidirectional, low pressure sodium illumination (or similar), and directed away from preserve areas using appropriate placement and shields.

- ~~M-BR-13. Permanent impacts to coastal sage scrub and disturbed coast sage scrub shall be mitigated at the ratio of 2:1 totaling 29.0 acres within the 122.4-acre proposed on-site open space easement as detailed in the Conceptual Resource Management Plan (Appendix F-3). (Actual amount of coastal sage scrub preserved on-site is 74.5 acres). If Palomar Community College mitigates for impacts associated with Horse Ranch Creek, this would reduce impacts to disturbed coastal sage scrub by 0.7 acre and mitigation by 1.4 acres for a total mitigation requirement of 27.6 acres. Temporary impacts in the amount of 0.3 acres shall be mitigated through revegetation with the same plant species found within the impact area. The revegetation areas are shown on the Conceptual Landscape Plan.~~
- ~~M-BR-14. Permanent impacts to southern mixed chaparral shall be mitigated at the ratio of 0.5:1 totaling 1.1 acres within the 122.4 acre proposed on-site open space easement as detailed in the Conceptual Resource Management Plan (Appendix F-3). (Actual amount of southern mixed chaparral preserved on-site is 17.5 acres).~~
- ~~M-BR-15. Permanent impacts to coast live oak woodland shall be mitigated at the ratio of 3:1 totaling 0.9 acres within the 122.4 acre proposed on-site open space easement as detailed in the Conceptual Resource Management Plan (Appendix F-3). (Actual amount of coast live oak woodland preserved on-site is 1.7 acres).~~
- ~~M-BR-16. Permanent impacts to non-native grassland shall be mitigated at the ratio of 0.5:1 totaling 7.7 acres within the 122.4 acre proposed on-site open space easement as detailed in the Conceptual Resource Management Plan (Appendix F-3). (Actual amount of non-native grassland preserved on-site is 22.0 acres).~~
- ~~M-BR-17. Permanent impacts to pastureland shall be mitigated at the ratio of 0.5:1 totaling 15.1 acres of non-native grassland. A portion of the mitigation shall be on site within the proposed open space easement. An additional 2.7 acres of mitigation land is required and shall be preserved off site as detailed in the Conceptual Resource Management Plan (Appendix F-3). If Palomar Community College mitigates for impacts associated with Horse Ranch Creek, this would reduce impacts to pastureland by 16.7 acres and mitigation by 8.3 acres for a total mitigation requirement of 6.8 acres.~~
- ~~M-BR-18. Impacts to willow/mule fat scrub, southern willow scrub, southern arroyo willow riparian forest, and freshwater marsh shall be mitigated through dedication, restoration, creation and/or enhancement of wetlands at a ratio of 3:1 for a total of 12.3 acres or as defined through required state and federal wetland permits as detailed in the Conceptual Wetland Mitigation Plan (Appendix F-4). The Conceptual Wetlands Mitigation Plan will be updated~~

~~to account for the impacted Jurisdictional Vegetated Wetlands separately from the impacted Vegetation Communities Impacts.~~

~~If Palomar Community College mitigates for impacts associated with Horse Ranch Creek, this would reduce impacts to willow/mule fat scrub, southern willow scrub, southern arroyo willow riparian forest, and freshwater marsh by 1 acre and mitigation by 3 acres for a total mitigation requirement of 9.3 acres. Temporary impacts shall be mitigated through revegetation with the same plant species found within the impact area. The revegetation areas are shown on the Conceptual Landscape Plan.~~

~~M-BR-19. Permanent impacts to jurisdictional wetlands will follow the terms and conditions of permits and agreements with ACOE and CDFG.~~

~~Permanent impacts shall be mitigated at a ratio of 3:1 and shall consist of purchase and dedication of replacement habitat, creation of wetlands, and revegetation of disturbed riparian habitat. Mitigation measures for impacts to ACOE jurisdictional wetlands, CDFG vegetated riparian habitat, and RPO wetlands are listed as follows:~~

~~ACOE jurisdiction: Permanent impacts to 0.83 acre on-site and 2.29 acres off-site, for a total of 3.12 acres of ACOE jurisdictional waters and wetlands shall be mitigated with 9.36 acres of ACOE jurisdictional waters and wetlands. If Palomar Community College mitigates for impacts associated with Horse Ranch Creek, this would reduce impacts to ACOE jurisdiction by 0.11 acre and mitigation by 0.33 acres for a total mitigation requirement of 9.25 acres.~~

~~CDFG jurisdiction: Permanent impacts to 0.93 acres on-site and 2.29 acres off-site for a total of 3.22 acres of CDFG jurisdictional waters and vegetated riparian habitat shall be mitigated with 9.66 acres of CDFG jurisdictional waters and vegetated riparian habitat. If Palomar Community College mitigates for impacts associated with Horse Ranch Creek, this would reduce impacts to CDFG jurisdiction by 0.11 acre and mitigation by 0.33 acre for a total mitigation requirement of 9.25 acres.~~

~~RPO jurisdiction: Permanent impacts to 2.29 acres of RPO wetlands off-site shall be mitigated with 6.87 acres of RPO wetlands. If Palomar Community College mitigates for impacts associated with Horse Ranch Creek, this would reduce impacts to RPO jurisdiction by 0.11 acre and mitigation by 0.33 acre for a total mitigation requirement of 9.25 acres.~~

~~The Conceptual Wetlands Mitigation Plan will be updated to account for the impacted Jurisdictional Vegetated Wetlands separately from the impacted Vegetation Communities Impacts.~~

~~M-BR-20. Temporary impacts to 2.04 acres of jurisdictional wetlands shall be mitigated through revegetation with the same plant species found within the impact area. The revegetation areas are shown on the Conceptual Landscape Plan. If Palomar Community College~~

~~mitigates for impacts associated with Horse Ranch Creek, this would reduce temporary impacts by 0.4 acre.~~

#### 5.4.4 Level of Significance After Mitigation

Mitigation Measures M-BR-3a, M-BR-11, and M-BR-12 in the Certified EIR are applicable to the Proposed Project. With the implementation of these mitigation measures, Project impacts would be less than significant and would not be greater than those identified in the Certified EIR.

### 5.5 CULTURAL RESOURCES

#### 5.5.1 Summary of Impacts in the Certified EIR and 2019 Addendum

Cultural resources are analyzed in Certified EIR Section 3.3. The Certified EIR analyzed impacts to cultural resources and concluded that the development of the Approved Project could result in the loss of known archaeological site CA-SDI-682 and/or the loss of previously unrecorded archaeological resources or human remains. Cumulative impacts analyzed by the Certified EIR were determined to be less than significant. The Certified EIR identified that impacts to cultural resources would be less than significant with Mitigation Measures M-CR-1 through M-CR-5.

The 2019 Addendum included preserving in place and capping the archaeological site CA-SDI-682, which substantially reduced potential impacts from the site. The 2019 Addendum concluded that there would be no overall increase of severity of demands on cultural resources beyond those analyzed in the Certified EIR.

#### 5.5.2 Impacts Associated with the Proposed Project

Since the previous EIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or “new information of substantial importance” that cause one or more effects to cultural resources including: causing a change in the significance of a historical or archaeological resource as defined in State CEQA Guidelines Section 15064.5; destroying a unique paleontological resource or site or unique geologic feature; and/or disturbing any human remains, including those interred outside of formal cemeteries?

Yes  
☐

No  
☒

CEQA Guidelines Section 15064.5 defines historic resources as resources listed or determined to be eligible for listing by the State Historical Resources Commission, a local register of historical resources, or the lead agency. Generally, a resource is considered “historically significant” if it meets one of the following criteria:



- I. Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;
- II. Is associated with the lives of persons important in our past;
- III. Embodies the distinctive characteristics of a type, period, region or method of construction, or represents the work of an important creative individual, or possesses high artistic values;
- IV. Has yielded, or may be likely to yield, information important in prehistory or history.

The Project Site consists of a vacant, manufactured lot with no built resources. Project implementation would not result in any alterations of a historical resource, as defined by CEQA Guidelines Section 15064.5. No impacts to historical resources would occur.

Archaeological resources are cultural resources of prehistoric or historic origin that reflect human activity. Archaeological resources include both structural ruins and buried resource (buildings, structures, objects, and sites of the built environment). The term unique archaeological resources is defined in Public Resources Code Section 21083.2(g) as:

"An archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria:

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

The Cultural Resources Study prepared for the Approved Project (Certified EIR Appendix H) identified potential buried archaeological deposits associated with the Rancho Monserrate Adobe, in areas containing Quaternary alluvium. The Project Site is within the area of potential archaeological deposits.

The entire Project Site was rough graded in 2020. According to the geotechnical study prepared by Construction Testing and Engineering (Appendix D), grading consisted of removing varying levels of topsoil, alluvium, and old alluvium to expose competent old alluvium, Bonsall Tonalite bedrock, or to a depth of three or four feet above groundwater, and recompact soils on the Project Site and nearby soils to achieve the existing grade. Although Project soils have been disturbed to deep depths, the Project's geotechnical study recommends further ground improvements in areas of the proposed buildings above young alluvium soils. Aggregate piers would be installed below building foundations up to 45 feet below ground surface to mitigate potential liquefaction and seismic settlement of materials left in place during the previous grading activities. Although unlikely, it is possible the proposed aggregate piers could affect soils not previously disturbed and result in the accidental discovery of archaeological resources. Therefore, the Proposed Project would require archaeological monitoring for the installation

of the proposed aggregate piers, as outlined in Certified EIR Mitigation Measure M-CR-3 to reduce potentially significant impacts on unique archaeological resources to below significance.

The Project Site has been rough graded and disturbed, as described above. Project impacts to paleontological resources or unique geologic features is low, and impacts would be less than significant.

Based on the previous grading activities, it is very unlikely that human remains would be found on the Project Site. However, archaeological monitoring (Certified EIR Mitigation Measure M-CR-3) as required for the accidental discovery of archaeological resources would further reduce potentially significant impacts related to the accidental discoveries of human remains to less than significant.

There would not be new or substantially more severe impacts to cultural resources compared with the significance determination in the Certified EIR.

### 5.5.3 Adopted Mitigation Measures Applicable to the Proposed Project

The following mitigation measures were identified in the Certified EIR. Applicability of each mitigation measure has been evaluated. The mitigation measures have been modified where appropriate to reflect the Proposed Project.

~~M-CR-1 — **Historical Resources.** A County-approved archaeologist and a Luiseño Native American monitor shall monitor grading in the vicinity of the mapped location of the Monserrate Adobe (refer to Figure 35 in Appendix H), as well as the area north of SR-76. A Monitoring Discovery Plan shall be prepared prior to commencement of construction activity, to be put in use in the event historic deposits are discovered. All historic artifacts recovered during all phases of survey, testing, and grading monitoring shall be curated according to current professional repository standards. The collections and associated records shall be transferred, including title, to an appropriate curation facility within San Diego County that meets federal standards per 36 CFR Part 79, to be accompanied by payment of the fees necessary for permanent curation. All prehistoric artifacts recovered during all phases of survey, testing, and grading monitoring shall be curated with a Luiseño Native American Tribe. The collections and associated records shall be transferred to a Luiseño Native American Tribe within San Diego County.~~

~~If human remains are encountered, all ground disturbance activities in the immediate vicinity of the discovery shall be halted and all requirements under Public Resources Code section 5097.98 and the County Guidelines for Cultural Resources shall be followed.~~

~~M-CR-2a — **Archaeological Resources.** To preserve the integrity of CA-SDI-682, the applicant shall cap Loci A and B per County of San Diego standards, landscaped as part of the overall development and placed in a conservation open space easement. A Preservation Plan describing the methods and ultimate disposition of the capped site area has been prepared and is included as Appendix H of the Cultural Resources Report. The location of the conservation open space easement is shown in Figure 4 of this Plan. If Palomar~~

Community College mitigates for impacts associated with Horse Ranch Creek, they will be responsible for mitigation associated with Locus B, which entails capping, temporary fencing, and open space easement dedication.

M-CR-2b. ~~**Archaeological Resources.** For the protection of archaeological site CA SDI 682, Loci A and Loci B, the applicant shall prepare and implement a temporary fencing plan during any grading activities within one hundred feet. The fencing plan shall be prepared in consultation with a County-approved archaeologist and a Luiseño Native American representative to the satisfaction of the Director of the Department of Planning and Land Use. The fenced area should include a buffer sufficient to protect the archaeological site. The fence shall be installed under the supervision of the qualified archaeologist prior to commencement of grading or brushing and be removed only after grading operations have been completed.~~

M-CR-3 **Archaeological Resources.** A County-approved archaeologist and a Luiseño Native American representative shall monitor ground improvements related to the installation of aggregate piers within areas with liquefiable soils on the Project Site grading in the vicinity of Loci C, as well as the area north of existing SR-76. A Monitoring Discovery Plan shall be prepared prior to commencement of the installation of the aggregate piers construction activity, to be put in use in the event archaeological deposits are discovered. All artifacts recovered during all phases of survey, testing, and grading monitoring shall be curated with a Luiseño Native American Tribe. The collections and associated records shall be transferred to a Luiseño Native American Tribe within San Diego County.

If human remains are encountered, all ground-disturbance activities in the immediate vicinity of the discovery shall be halted and all requirements under Public Resources Code section 5097.98 and the County of San Diego Guidelines for Cultural Resources shall be followed.

M-CR-4 ~~**Archaeological Resources.** A County-approved archaeologist and a Luiseño Native American representative shall monitor grading and subsurface excavation in off-site areas. All artifacts recovered during all phases of survey, testing and grading monitoring shall be curated with a Luiseño Native American Tribe. The collections and associated records shall be transferred, to a Luiseño Native American Tribe within San Diego County.~~

~~If human remains are encountered, all ground disturbance activities in the immediate vicinity of the discovery shall be halted and all requirements under Public Resources Code section 5097.98 and the County Guidelines for Cultural Resources shall be followed.~~

M-CR-5 ~~**Archaeological Resources.** A County-approved archaeologist and a Luiseño Native American representative shall monitor grading and subsurface excavation in on- and off-site areas not covered by CR-1 and CR-3. All artifacts recovered during all phases of survey, testing, and grading monitoring shall be curated with a Luiseño Native American Tribe.~~

~~The collections and associated records shall be transferred including title, to a Luiseño Native American Tribe within San Diego County~~

~~If human remains are encountered, all ground disturbance activities in the immediate vicinity of the discovery shall be halted and all requirements under Public Resources Code section 5097.98 and the County Guidelines for Cultural Resources shall be followed.~~

#### 5.5.4 Level of Significance After Mitigation

Mitigation Measure M-CR-3 in the Certified EIR is applicable to the Proposed Project. With implementation of this mitigation measure, Project impacts would be less than significant and would not be greater than those identified in the Certified EIR.

## 5.6 GEOLOGY AND SOILS

### 5.6.1 Summary of Impacts in the Certified EIR and 2019 Addendum

Section 3.2 of the Certified EIR analyzes geology and soil impacts associated with the Approved Project. Two potential impacts were found to be less than significant in the Certified EIR, erodibility and expansive soils. The Approved Project required future developments to include erosion control measures and a landscaping plan that comply with San Diego County and Fallbrook community rules and regulations to prevent soil erosion on- and off-site. Thus, impacts associated with erosion would be less than significant. The Certified EIR included specific design measures to reduce potential for hazards associated with both cut and fill slopes and seepage and perched water. Impacts related to expansive soil would be less than significant with the implementation of design features included in the Certified EIR.

Regarding faults and liquefaction, the Certified EIR concluded that since there are no known active faults on the Project Site, since development would be required to conform with the Universal Building Code, California Building Code, and San Diego County Zoning Ordinance, and since recommendations provided for project-specific geotechnical studies would be implemented, impacts associated with active faults would be less than significant.

Impacts associated with liquefaction would be significant as portions of the Approved Project could be subject to liquefaction. Areas of concern noted in the Certified EIR are the main drainage in the southwestern area of the Approved Project, which includes the Project Site. Certified EIR Mitigation Measure M-GE-1 requires the inclusion of site-specific geotechnical design criteria beyond standard design measures, including the requirement to raise the grade of the Approved Project and the re-compacting of soils over liquefiable deposits, and would reduce potential impacts relative to liquefaction to less than significant levels.

The Certified EIR concluded that the potential for significant impacts from rockfall exists from the west-facing slope of Rosemary's Mountain due to seismic or erosional events. Mitigation Measure M-GE-2 was identified to require the removal or breakdown of boulders identified in this portion of the property as potentially dangerous, testing of smaller boulders, and monitoring after heavy rainfall events to reduce potentially significant impacts to below a level of significance.

The 2019 Addendum amended Certified EIR Mitigation Measure M-GE-2 for rockfall hazards. Due to hillside conditions that would require extensive habitat disturbance to carry out the testing of boulders, it was found that the recommendations for mitigating rockfall hazards in the Certified EIR would not be feasible. The 2019 Addendum updated Mitigation Measure M-GE-2 to require construction of rockfall barriers at the base of Rosemary's Mountain, along the east side of Horse Ranch Creek Road and along the southeastern edge of PA-2, south of the detention basin, south of the Project Site. The 2019 Addendum concluded that the modified mitigation measure fell within the category of minor changes in design features.

### 5.6.2 Impacts Associated with the Proposed Project

Since the previous EIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that result in one or more effects from geology and soils including: exposure of people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, seismic-related ground failure, including liquefaction, strong seismic ground shaking, or landslides; result in substantial soil erosion or the loss of topsoil; produce unstable geological conditions that will result in adverse impacts resulting from landslides, lateral spreading, subsidence, liquefaction or collapse; being located on expansive soil creating substantial risks to life or property; and/or having soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

Yes  
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No  
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The analysis in this section is based in part on the following technical report:

- Geotechnical Investigation, Potential New School Site. Bonsall Unified School District. Southeast Corner of Horse Ranch Creek Road and Shire Court. Fallbrook, California. Construction Testing and Engineering. April 2023.

A complete copy of the study is included in Appendix D of this Addendum.

The Project Site is not located within a State-designated Earthquake Fault Zone, no known active fault traces underlie or project toward the Site, and no known potentially active fault traces underlie or project toward the Project Site. Therefore, the potential for ground surface rupture occurring at the Project Site is considered low. No impact related to ground rupture would occur.

The level of seismicity within recent history (last 50 years) of the San Diego area is relatively low compared to other areas of Southern California and northwestern Baja California. Nevertheless, the Project Site could be subject to significant shaking in the event of a major earthquake. The high seismic activity in the region is associated with the Elsinore Fault Zone and the San Jacinto Fault Zone, located approximately 7.6 and 25 miles northeast of the Project Site, respectively. The proposed school would be designed and constructed to meet seismic requirements of the applicable California Building Code for public school construction, which are more stringent than requirements set by the Certified EIR. Recommendations of the geotechnical report have been incorporated into the Project.

Liquefaction occurs when saturated fine-grained sands or silts lose their physical strengths during earthquake-induced shaking and behave like a liquid. Liquefaction potential varies with water level, soil type, material gradation, relative density, and probable intensity and duration of ground shaking. Previous grading at the Project Site consisted of removing topsoil, alluvium, and old alluvium to expose competent old alluvium, Bonsall Tonalite bedrock, or to a depth of three or four feet above groundwater. Existing soils were recompacted to achieve the existing grade, implemented as a part of Certified EIR Mitigation Measure M-GE-1. The geotechnical investigations completed for the Proposed Project determined, however, that the east-southeast portion of the site is underlain by moderate- to deep-depths (greater than 50 feet deep) of young alluvium that is potentially compressible and not suitable to receive settlement-sensitive structures without ground improvement and/or deepened foundations. Therefore, the proposed school buildings proposed within this area will be installed with aggregate piers, up to 45 feet below ground surface to reduce potential liquefaction and seismic settlement. The proposed ground improvements are required to meet the stringent structural design standards for public school construction, pursuant to California Building Code standards, and have been incorporated into the Proposed Project to reduce potential liquefaction effects. As designed, the Proposed Project impacts related to seismic-related ground failure, including liquefaction, would be less than significant, and no additional mitigation is required.

The proposed development footprint is relatively flat. With adherence to industry standard site preparation methods, the potential for slope instability from deep-seated landsliding on the Project Site is low. Impacts would be less than significant.

The Proposed Project would comply with the Certified EIR's erosion control measures and landscaping plan that would comply with San Diego County and Fallbrook community rules and regulations to prevent soil erosion on- and off-site. Impacts on soil erosion would be less than significant.

The Proposed Project would require ground improvements below the proposed building structures within the east-southeast portion of the Project Site to mitigate potential liquefaction and settlement effects. Construction of proposed buildings in the western portion of the Project Site would not require these improvements, as soils in this area are medium dense to dense fill and/or old alluvial deposits that can support the proposed building loads. Proposed buildings in the western portion would require standard construction practices, adhering to California Building Code standards for public school construction. There are no other known geologic conditions known on the Project Site. Incorporating the recommendations of the geotechnical investigation (Appendix D) would reduce potential impacts related to on-site soil and geological conditions to acceptable standards.

The Certified EIR identified potential off-site rockfall hazards associated with boulders on the west-facing slope of Rosemary's Mountain; loose boulders can be a concern related to seismic or erosional events. The Certified EIR included Mitigation Measure M-GE-2, which requires boulders identified as having a high potential of rockfall to be broken and removed, and those having a less-than-significant rockfall potential to be tested, and if required broken and removed. The 2019 Addendum amended Mitigation Measure M-GE-2, and rockfall barriers have been constructed along the base of Rosemary's Mountain, south of the Project Site. The Proposed Project's Registered Professional Engineer and Certified Engineering Geologist evaluated the boulders west and south of the Project Site and confirmed that they are deep seated,

relatively stable, and unlikely to detach; see Appendix D. Therefore, additional rockfall barriers adjacent to PA-2 are not required, and potential impacts concerning on- and off-site soil and geologic conditions would be less than significant.

Expansive soils expand when provided with a water source and will contract when drying, which can cause damage to structures, pavements, and other improvements on a site. Testing was performed on a sample of the fill materials on the Project Site. Results indicate that fill soils recompacted during the 2020 grading activities have a very low to low expansion potential. The analysis concludes that expansive soils are not a constraint to development on the Project Site and would not cause direct or indirect risks to life or property. Proposed Project impacts related to expansive soils would be less than significant.

Project development would include the installation of new laterals connecting the proposed buildings to sewer mains in Horse Ranch Creek Road. The proposed school would not use septic tanks or other alternative wastewater disposal systems. No geological impacts would occur from wastewater disposal systems.

Project impacts on geology and soils would not be greater than those analyzed in the Certified EIR, and no mitigation measures would be required.

### **5.6.3 Adopted Mitigation Measures Applicable to the Proposed Project**

The following mitigation measures were identified in the Certified EIR and modified with the 2019 Addendum. Applicability of each mitigation measure has been evaluated. The mitigation measures have been modified where appropriate to reflect the Proposed Project.

~~M-GE-1. The applicant shall raise the grade while also removing and re-compacting the alluvium above the groundwater table to increase the overburden pressure over the liquefiable deposits as recommended by the geotechnical engineer.~~

~~M-GE-2. Mitigation of rockfall potential shall consist of the following:~~

- ~~• The boulders identified as having a high potential of rockfall in the Response to County of San Diego Review Comments for Rockfall prepared by Geocon Incorporated dated March 31, 2011 shall be broken and removed from the slope, or alternatively rock bolted to the slope as part of the grading of the site.~~
- ~~• Boulders identified as having a less than significant rockfall potential shall be tested by applying pressure with an excavator. If the boulders move they shall be mitigated using the same techniques described for boulders with high potential for rockfall. Boulders identified as having a less than significant rockfall potential shall be monitored during grading after any heavy rains if they should occur. If any undermining on the downhill side of any of the boulders has occurred, removal and/or breaking of the boulder(s) as recommended shall be performed to mitigate the rockfall hazard.~~



- ~~• A letter of certification shall be provided by a California Registered Professional Engineer or Certified Engineering Geologist to the [DPLU, PCC], which states that the identified rockfall hazards at the site have been mitigated to a level of less than significant and any proposed buildings are safe for human occupancy.~~
- ~~• The above certification letter shall be provided prior to approval of any building plans and issuance of any building permit. The [DPLU, PCC] shall review the rockfall hazard certification report for compliance with this condition.~~

#### 5.6.4 Level of Significance After Mitigation

The above mitigation measures, as modified in the 2019 Addendum, have been implemented and have therefore been satisfied. With the incorporation of recommendations of the Proposed Project's geotechnical investigation, potentially significant impacts related to liquefaction hazards would be mitigated to less than significant. Impacts would not be greater than those identified in the Certified EIR.

### 5.7 GREENHOUSE GAS EMISSIONS

#### 5.7.1 Summary of Impacts in the Certified EIR and 2019 Addendum

The Certified EIR Section 2.2 analyzes greenhouse gas (GHG) emission impacts associated with the Approved Project. GHG emissions generated by the entire Meadowood Specific Plan were evaluated and demonstrated a 34 percent reduction in GHG emissions from the business-as-usual (BAU) condition. Because the project would achieve greater than the 33 percent reduction from the BAU condition to achieve 1990 emissions levels by 2020, the project was found to be consistent with and assist in achieving the County's GHG reduction goals. The Certified EIR thus concluded that climate change impacts would be less than significant.

The 2019 Addendum concluded that it would not result in an increase in GHG emissions compared to the approved project and that there would be no change in the severity of climate change impacts beyond that previously discussed in the Certified EIR. No new mitigation measures were identified.

#### 5.7.2 Impacts Associated with the Proposed Project

The analysis in this section is based in part on the following technical report:

- Air Quality and Greenhouse Gas Emissions Assessment for the Bonsall Unified School District Citro School Project. San Diego County, California. ECORP Consulting, Incorporated. February 2023.

A complete copy of the study is included in Appendix F of this Addendum.

Since the previous EIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that result in one or more effects related to environmental effects associated with greenhouse gas emissions or compliance with applicable plans, policies or regulations adopted for the purpose of reducing greenhouse gas emissions?

Yes  
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No  
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The threshold of significance used to determine that the GHG emissions of the Approved Project were less than significant is no longer an acceptable approach based on the 2015 California Supreme Court Newhall Ranch decision. The County of San Diego does not currently have any approved quantitative thresholds related to GHG emissions. Therefore, the Proposed Project's assessment relies on the South Coast Air Quality Management District screening threshold for typical land use projects of 3,000 metric tons of carbon dioxide equivalent (CO<sub>2</sub>e). This threshold was developed based on substantial evidence that such thresholds represent quantitative levels of GHG emissions, compliance with which means that the environmental impact of the GHG emissions will normally not be cumulatively considerable under CEQA. The 3,000 metric tons of CO<sub>2</sub>e per year value represents less than 1 percent of future 2050 statewide GHG emissions target.

The Certified EIR evaluated GHG emissions for a 12.8-acre school. The Proposed Project assumes development and operation of a 11.2-acre school for up to 650 TK through 8<sup>th</sup> grade students. The GHG emissions analysis for the Proposed Project evaluates the difference in both construction and operational-related GHG emissions from the increased size of the school. As compared to the Certified EIR, GHG emissions generated by the construction of the Proposed Project would slightly increase by 74 metric tons of CO<sub>2</sub>e per year from 705 metric tons of CO<sub>2</sub>e to 779 metric tons CO<sub>2</sub>e per year, which is less than the threshold of 3,000 metric tons of CO<sub>2</sub>e per year. Operation of the Proposed Project would generate approximately 1,421 more metric tons CO<sub>2</sub>e of GHG emissions (or 2,126 metric tons CO<sub>2</sub>e) than that analyzed in the Certified EIR. This is largely due to an increase in mobile-source emissions as a result of the increased number of students that would be attending the proposed school. Nonetheless, emissions generated by the Proposed Project would not exceed the significance threshold of 3,000 metric tons of CO<sub>2</sub>e per year during operations.

As the Project's emissions are below the significance threshold, the Project would not interfere with plans, policies, or regulations, including the state's goal to reduce GHG emissions under Executive Order S-3-05, to 80 percent below 1990 levels by the year 2050.

Therefore, Project impacts relative to GHG emissions would not be greater than those analyzed in the Certified EIR, and no mitigation measures would be required.

### **5.7.3 Adopted Mitigation Measures Applicable to the Proposed Project**

The Certified EIR did not include mitigation measures for GHG emissions, and the Proposed Project does not require mitigation.

### **5.7.4 Level of Significance After Mitigation**

The Proposed Project would result in less than significant impacts relative to GHG emissions, and the Proposed Project would not result in a new or substantially more severe significant impact compared with the significance determination contained in the Certified EIR.

## **5.8 HAZARDS AND HAZARDOUS MATERIALS**

### **5.8.1 Summary of Impacts in the Certified EIR and 2019 Addendum**

Section 3.5 of the Certified EIR analyzes the following nine issues concerning hazards and hazardous materials:

- Issue 1, Dam Inundation. The Certified EIR determined that the proposed school site in PA-2 would be outside of any dam inundation zone. Impacts were determined to be less than significant.
- Issue 2, Emergency Air Support. The Certified EIR determined that since no structure would be 100 feet or greater in height, there would be no interference with emergency response missions utilizing low flying aircraft. Impacts were determined to be less than significant.
- Issue 3, Hazardous Substance Use. The Certified EIR determined that since the Approved Project would not include the handling of hazardous substances as part of a business subject to hazardous material regulations, and that the proposed land uses would not result in the transport, emission, or disposal of hazardous materials, generate hazardous waste, or store hazardous waste, and would comply with the California Health and Safety Code, impacts would be less than significant.
- Issue 4, Hazardous Substances within One-Quarter Mile of a School. The Certified EIR determined that the Approved Project would not include any potential for facilities located within 0.25 mile of the Project Site that would handle regulated substances. Therefore, impacts would be less than significant. The Certified EIR also concluded that the proposed school site within the Approved Project would be located farther than 0.25 mile from any potential future commercial uses of the Campus Park development and from the on-site wastewater treatment plant. Therefore, impacts relative to potentially hazardous effects within 0.25 mile of the proposed school site in PA-2 were determined to be less than significant.
- Issue 5, Hazardous Materials Site/Site Subject to Release of Hazardous Substances. Potentially significant impacts associated with hazards were identified in the Certified EIR as a result of two irrigation ponds and smudge pots located on-site, as well as potential release of asbestos from proposed demolition of existing buildings. The Certified EIR required adoption of Mitigation Measures M-HZ-1 through M-HZ-3 to reduce significant impacts to less than significant.
- Issue 6, Hazardous Site Location. The Certified EIR determined that since the Approved Project is not within 1,000 feet of a landfill or within 250 feet of a burn site, impacts would be less than significant.
- Issue 7, Fire Hazard. The Certified EIR determined that implementation of a Fire Protection Plan, along with project design features related to fuel modification zones, the use of ignition resistant building materials, road design requirements, construction of fire hydrants, and provision of fire access, would reduce potential impacts concerning fire hazards to less than significant.
- Issue 8, Emergency Response. The Certified EIR determined that the farthest dwelling unit from the nearest fire station could be reached within five minutes, which complies with the General

Plan fire response time. Therefore, the Certified EIR concluded that the Approved Project would meet emergency response objectives, and impacts associated with emergency response time would be less than significant.

- Issue 9, Vectors. The Certified EIR determined that the stormwater system within the Approved Project would be designed to ensure that existing vectors are excluded from stormwater facilities and that habitat for vector breeding would be minimized, along with appropriate pond design and application of larvicides within the wet weather ponds, to ensure impacts associated with vectors would be less than significant.

The Certified EIR found that there would be no cumulative impacts associated with hazards and hazardous materials as a result of implementing the project.

The 2019 Addendum did not identify any additional impacts or new mitigation measures related to hazards and hazardous materials. With the implementation of Certified EIR Mitigation Measures M-HZ-1 through M-HZ-3, the 2019 Addendum concluded there would be no increase of severity of hazardous materials beyond what was identified in the Certified EIR.

#### **5.8.2 Impacts Associated with the Proposed Project**

Since the previous EIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that result in one or more effects from hazards and hazardous materials including: creation of a significant hazard to the public or the environment through the routine transport, storage, use, or disposal of hazardous materials or wastes; creation of a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment; production of hazardous emissions or handling hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school; location on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 creating a hazard to the public or the environment; location within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport; within the vicinity of a private airstrip resulting in a safety hazard for people residing or working in the project area; impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan; and/or exposure of people or structures to a significant risk of loss, injury or death involving wild land fires, including where wild lands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Yes  
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No  
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The analysis provided in this section is based in part on the following technical report:

- Phase I Environmental Site Assessment Report. Converse Consultants. July 2022.

Complete copies of the reports are included in Appendix G of this Addendum.

Project construction would involve small quantities of hazardous materials such as fuels, greases, paints, and cleaning materials. Similarly, Project operations would require the use of small amounts of cleansers, paints, and pesticides for cleaning and maintenance purposes. The transport, use, storage, disposal, and handling of hazardous materials are governed by regulations that are enforced by the Department of Toxic Substances Control (DTSC), Environmental Protection Agency, Occupational Safety and Health Administration, and San Diego County Department of Environmental Health and Quality (DEHQ). The District and its construction contractors would comply with federal, state, and local regulations concerning the handling, transport, storage and disposal of all hazardous materials and wastes during Project construction and operation. Therefore, potential hazards to the public and environment through foreseeable upset and accidental conditions involving the release of hazardous materials into the environment would be less than significant.

There are no existing or proposed schools within 0.25 mile of the Project Site. The closest school, Sullivan Middle School, is approximately 3.5 miles southwest of the Project Site. As discussed above, any potential hazards used at the Project Site during construction and school operations would be in accordance with existing regulations, and the potential for an accidental release that would impact a school would be less than significant.

The Meadowood Project Applicant evaluated the Project Site for hazardous soils as well as soils from areas within the Meadowood Project area where soils would be imported to the Project Site. The analysis was conducted pursuant to the requirements of the DTSC for new public schools. A Preliminary Environmental Assessment (PEA) was completed in January 2017. All chemicals tested were determined to be non-detect, less than the applicable screening level, or within the DTSC-accepted range for public school construction. Nevertheless, the PEA recommended the removal and disposal of the upper 1-foot of soil at the proposed school site and areas where soils would be imported to the Project Site, prior to fill activities. The DTSC approved the PEA and issued a letter of No Further Action on February 24, 2017, for the Project Site.

As part of the Proposed Project, the District prepared a Phase I Environmental Site Assessment (ESA) for the Project Site (2022). The Phase I ESA confirmed that the recommendations of the January 2017 PEA were implemented, and no other hazardous materials posed a concern at the Project Site at the completion of the Phase 1 ESA.

The Phase 1 ESA also included a review of California Government Code Section 65962.5 which requires the DTSC to compile a list of hazardous materials sites and be made available to the public. These lists include:

- Hazardous waste facilities subject to corrective action.
- Land designated as hazardous waste property.
- Public drinking water wells that contain detectable levels of organic contaminants.
- Underground storage tanks for which an unauthorized release report is filed.
- Solid waste disposal facilities from which there is a migration of hazardous waste and for which a California regional water quality control board has notified the DTSC.

The Phase 1 ESA did not identify the Project Site on any of the above lists. The DEHQ was also consulted to identify facilities within 0.25 mile of the Project Site. The DEHQ conducted a search of the area and returned no results.

The Project Site is not within an airport land use plan or two miles of a public use airport per the San Diego County Regional Airport Authority . The closest airport, the Fallbrook Community Airpark, is approximately 6.4 miles to the west. Project implementation would not result in a safety hazard or create excessive noise for people residing or working in the project area, including at the Project Site.

The Proposed Project would not impair the implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. All construction activities, including the staging of equipment, materials storage, and parking for workers, would occur on-site. Operation of the proposed school would be similar to most schools; there would be some vehicles queueing about 15 minutes before the morning bell and about 10 to 15 minutes after the afternoon dismissal bell. These conditions would be short-term. Moreover, the layout of the proposed school would further limit queueing on Horse Ranch Creek Road and Shire Court. Vehicles accessing the on-site loading areas would be required to start queueing from the ingress at the northern end of the campus to get to the loading areas; though two areas have been identified for loading, students could be dropped off anywhere along the two-lane driveway, including one for vehicle passing, on the eastern side of the campus. The proposed design of the campus would be reviewed by the North County Fire Protection District to ensure adequate emergency and fire access would be provided throughout the campus. Therefore, the Proposed Project would not impair or interfere with the community's emergency response or evacuation plan.

The Project Site is in a Very High Fire Hazard Zone, as mapped by the California Department of Forestry and Fire Protection. To mitigate potential risks associated with wildfires, the Meadowood Specific Plan, as amended, and the Certified EIR include measures from the Fire Protection Plan to reduce risks of wildfire hazards. As described above in Section 3, the areas east, north, and west of the Project Site would be maintained by the Citro HOA with fuel modification improvements. Additionally, the proposed school would be constructed with building materials and include a landscape plant palette that would incorporate recommendations of the Fire Protection Plan. Therefore, Project implementation would not place people or structures at significant risk of loss, injury or death involving wildfires.

Project impacts regarding hazards and hazardous materials would not be greater than those analyzed in the Certified EIR, and no mitigation measures would be required.

### **5.8.3 Adopted Mitigation Measures Applicable to the Proposed Project**

The following mitigation measures were identified in the Certified EIR. Applicability of each mitigation measure has been evaluated. The mitigation measures have been modified where appropriate to reflect the Proposed Project.

~~M-HZ-1. Prior to grading, irrigation water shall be removed from the two on-site irrigation ponds and soil samples from the bottom of the ponds shall be collected and analyzed for potential agricultural residues, to the satisfaction of the Director of DEH. If contamination is present, provide evidence to the satisfaction of the Director of DEH that all~~

~~contaminated soils from the irrigation ponds have been remediated under the oversight of the DEH's SAM Program or removed and properly disposed of at an appropriately permitted facility, in accordance with government agency regulations.~~

~~M-HZ-2. Prior to grading, surficial soil in the vicinity of the smudge pots and elsewhere on the property where minor surficial staining is evident shall be excavated, removed from the site, and properly disposed of at an appropriately permitted facility, in accordance with government agency regulations and to the satisfaction of the County DEH.~~

~~M-HZ-3a. Prior to issuance of a building permit that includes demolition of on-site structures and prior to commencement of demolition or renovation activities, a facility survey shall be performed to determine the presence or absence of ACMs located in the buildings to be demolished. Suspect materials that will be disturbed by the demolition or renovation activities shall be sampled and analyzed for asbestos content, or assumed to be asbestos containing. The survey shall be conducted by a person certified by Cal/OSHA pursuant to regulations implementing subdivision (b) of Section 9021.5 of the Labor Code, and shall have taken and passed an EPA-approved Building Inspector Course. Should regulated asbestos-containing materials be found, it shall be handled in compliance with the San Diego County Air Pollution Control District Rule 361.145 — Standard for Demolition and Renovation. Evidence of completion of the facility survey shall be submitted to County DEH and shall consist of a signed, stamped statement from the person certified to complete the facility survey indicating that the survey has been completed and that either regulated asbestos is present or absent. If present, the letter shall describe the procedures that will be taken to remediate the hazard.~~

~~M-HZ-3b. Prior to issuance of a building permit that includes demolition of on-site structures and prior to commencement of demolition or renovation activities, a survey shall be performed by a California Department of Health Services (DHS) certified lead inspector/risk assessor to determine the presence or absence of lead based paint (LBP) located structures to be demolished. All lead containing materials scheduled for demolition must comply with applicable regulations for demolition methods and dust suppression. Lead containing materials shall be managed in accordance with applicable regulations including, at a minimum, the hazardous waste disposal requirements (Title 22 California Code of Regulations [CCR] Division 4.5), the worker health and safety requirements (Title 8 California Code of Regulations Section 1532.1), and the State Lead Accreditation, Certification, and Work Practice Requirements (Title 17 CCR Division 1, Chapter 8). The survey must be submitted to and deemed complete by the County DEH.~~

#### 5.8.4 Level of Significance After Mitigation

The above mitigation measures, as modified in the 2019 Addendum, have been implemented and have therefore been satisfied. With incorporation of recommendations of the Fire Protection Plan, potentially significant impacts related to hazards and hazardous materials would remain less than significant. The



Proposed Project would not result in a new or substantially more severe significant impact compared with the significance determination identified in the Certified EIR.

## **5.9 HYDROLOGY AND WATER QUALITY**

### **5.9.1 Summary of Impacts in the Certified EIR and 2019 Addendum**

The Certified EIR provided an analysis of impacts related to hydrology and water quality in Section 4.2 and concluded that no significant impacts would occur as a result of the Approved Project. Four general issues were analyzed:

- Issue 1, Local Surface and Ground Water Quality. A Stormwater Management Plan and Drainage and Hydromodification Study, prepared in accordance with County regulations for the Approved Project, concluded that potential water quality impacts associated with short-term construction activities and long-term uses and overall drainage patterns of the Approved Project area would not be significant. Construction activities would require preparation of a SWPPP that would identify best management practices and design features to reduce potential impacts to less than significant.
- Issue 2, Flooding. Minor portions of PA 1 and Street R (located in PA 1) of the Approved Project are in the Horse Ranch Creek floodplain. The Proposed Project is not within the floodplain. According to the Certified EIR, improvements would be designed along Street R so that flows would not be impeded and conveyed downstream, thereby not resulting in an adverse impact to the floodplain. With the improvements proposed for Street R and the grading of PA 1, impacts associated with flooding would be less than significant.
- Issue 3, Runoff and Drainage. The Approved Project would not increase runoff velocities resulting in erosion or siltation, on- or off-site. The detention basins and the hydromodification management incorporated into the design of the basins would reduce runoff to pre-project levels. Additionally, the Approved Project would include erosion control measures that would result in placement of outfalls consistent with pre-project discharge locations. Impacts to runoff and drainage would be less than significant.
- Issue 4, Groundwater. The Certified EIR analyzed impacts associated with groundwater levels and concluded that the proposed use of 140.2 acre-feet of groundwater per year would result in a reduction of approximately 77 percent of groundwater use for the Approved Project area when compared to existing conditions. Impacts were determined to be less than significant.

The Certified EIR determined that cumulative impacts on hydrology and water quality would be less than significant due to the Approved Project's design features and conformance with existing regulatory requirements. Related cumulative projects would be subject to water quality standards identified in the National Pollutant Discharge Elimination System Permit, and therefore would be individually limited and not be cumulatively considerable.

The 2019 Addendum was required to implement best management practices such as bioretention basins, which would accommodate the revised design in conformance with County stormwater standards. The 2019 Addendum did not identify any additional impacts or mitigation measures.

### 5.9.2 Impacts Associated with the Proposed Project

Since the previous EIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause one or more effects to hydrology and water quality including: violation of any waste discharge requirements; an increase in any listed pollutant to an impaired water body listed under section 303(d) of the Clean Water Act; cause or contribute to an exceedance of applicable surface or groundwater receiving water quality objectives or degradation of beneficial uses; substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level; substantially alter the existing drainage pattern of the site or area in a manner which would result in substantial erosion, siltation or flooding on- or off-site; create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems; provide substantial additional sources of polluted runoff; place housing or other structures which would impede or redirect flood flows within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map, including County Floodplain Maps; expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam; and/or inundation by seiche, tsunami, or mudflow?

Yes  
☐

No  
☒

The District would prepare a SWPPP prior to construction, pursuant to the National Pollutant Discharge Elimination System and the State Water Resources Control Board's Construction General Permit (Order No. 20009-009-DWQ). The SWPPP would identify BMPs to control and reduce construction-related pollutants from discharging into waterways, including impaired water body listed under section 303(d) of the Clean Water Act. The BMPs would address erosion control, perimeter control, wind erosion control, storm drain inlet protection, tracking control, and general site management during construction. The entire Project Site would be fenced with green screening, and fiber rolls would be placed along the interior perimeters of the fenced areas. The existing drains on the west, north, and east would be protected, and the driveways providing construction access would be stabilized and installed with a tire wash. These project design features, along with other BMPs identified in the SWPPP, would limit runoff, potential erosion, siltation, and flooding on- and off-site during Project construction.

The proposed drainage would follow the existing pattern of the rough-graded Project Site, which is toward the stormwater detention basins to the south. A combination of biofiltration basins, tree wells, and modular wetland systems would be installed. Where needed, the underground systems would be lined with an impermeable liner, and the basins and modular systems would be sized to accommodate the required design capture volume and hydromodification volumes and treat stormwater in accordance with San Diego County requirements. Runoff would be treated and would not impact existing drainage

systems. The Proposed Project would not change the existing drainage patterns or cause erosion, siltation, or flooding on- or off-site.

The Proposed Project does not include any groundwater wells and would not decrease or interfere with groundwater supply, recharge or the groundwater table.

The Project Site is in Flood Zone X, which is an area defined with minimal flood hazards. The closest area with flood hazards is approximately 0.25 miles south of the Site and at a lower elevation than the Project Site.<sup>2</sup> The Project Site is located well inland of the Pacific Ocean and not located downward or adjacent to significant bodies of water. The occurrence of a tsunami and seiche caused by seismic or other factors would be remote. The Project would not release pollutants as the result of a flood, tsunami, or seiche.

Project impacts on hydrology and water quality would not be greater than those analyzed in the Certified EIR, and no mitigation measures would be required.

### **5.9.3 Adopted Mitigation Measures Applicable to the Proposed Project**

No mitigation measures were identified in the Certified EIR. The Proposed Project would comply with all applicable state and local regulations concerning drainage and water quality and would not require any mitigation.

### **5.9.4 Level of Significance After Mitigation**

The Proposed Project would result in a less than significant impact to hydrology and water quality, and impacts would not be greater than those identified in the Certified EIR.

## **5.10 LAND USE PLANNING**

### **5.10.1 Summary of Impacts in the Certified EIR and 2019 Addendum**

The Certified EIR analyzed land use and planning impacts in Section 4.1. It assessed the Approved Project's compliance with all elements, goals, and policies of the County General Plan, Fallbrook Community Plan, the I-15 Corridor Subregional Plan, and the I-15/SR-76 Interchange Management Strategic Plan (Appendix K of the Certified EIR). At the time of the Certified EIR (2012), the Approved Project was inconsistent with land use plans, policies, and regulations; however, as a part of the Approved Project, the applicant processed a General Plan Amendment and Rezone which thus rendered the Approved Project consistent with all applicable land use regulations. The Certified EIR identified impacts to land use planning as less than significant. It also determined that because there was not an established community within the Project area that would be subject to division, no impact would occur.

The 2019 Addendum relocated uses in the Approved Project area of the Certified EIR and resulted in changes to seven planning areas as identified in the Approved Project, including increasing the size of PA-2 by 0.1 acre. The 2019 Addendum did not relocate or introduce any new planning areas or change the total number of dwelling uses as approved by the Certified EIR. A minor deviation was processed in

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<sup>2</sup> Federal Emergency Management Agency. National Flood Hazard Layer Viewer. Accessed March 7, 2023.

conformance with the Specific Plan. The 2019 Addendum determined that there would be no change in the severity of land use and planning impacts beyond what was previously analyzed in the Certified EIR.

#### **5.10.2 Impacts Associated with the Proposed Project**

Since the previous EIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause one or more effects to land use and planning including: physically dividing an established community; and/or conflicts with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect?

Yes  
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No  
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The proposed school would be constructed in PA 2, which has a land use designation of Elementary School and an underlying RV-10 zoning district in the Meadowood Specific Plan. The school would serve the surrounding planned residential communities and students residing east of I-15 and north of West Lilac Road. As the Proposed Project is an allowed use under the Meadowood Specific Plan, would be compatible with the surrounding residential and park uses, and would be in conformance with the Approved Project, its implementation would not physically divide an established community nor conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the Project Site.

No impacts related to land use planning would occur, and no mitigation is required.

#### **5.10.3 Adopted Mitigation Measures Applicable to the Proposed Project**

No mitigation measures were identified in the Certified EIR, and the Proposed Project does not require any mitigation.

#### **5.10.4 Level of Significance After Mitigation**

The Proposed Project would result in no impact to land use and planning. Impacts would not be greater than those identified in the Certified EIR.

### **5.11 MINERAL RESOURCES**

#### **5.11.1 Summary of Impacts in the Certified EIR and 2019 Addendum**

Certified EIR Section 4.5 provides an analysis of mineral resources. The majority of the Meadowood Project area is designated MRZ-3 (Mineral Resources Potentially Present). The southernmost 39 acres of the Meadowood Project area and areas to the south and east, including on Rosemary's Mountain, are designated MRZ-2 (Regionally Significant Aggregate Resource Area). The Certified EIR concludes that the Meadowood Project would not result in the permanent inaccessibility for extraction of on-site or off-site mineral resources, and the Approved Project's impacts to mineral resources would be less than significant.

The 2019 Addendum concluded that there would be no increase of severity of impacts to mineral resources beyond that analyzed in the Certified EIR, and thus no new mitigation would be required.

### 5.11.2 Impacts Associated with the Proposed Project

Since the previous EIR was certified, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause one or more effects to mineral resources including: the loss of availability of a known mineral resource that would be of value to the region and the residents of the state; and/or loss of locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

Yes  
☐

No  
☒

According to the CalGEM Well Finder, there are no active oil wells or wells of any kind within the Project Site. There is active mining on the eastern slope of Rosemary's Mountain; however, it is approximately one-third mile away and shielded from the Project Site by the mountain. The Project Site is in an area designated MRZ-3, indicating that there is insufficient data to evaluate the significance of a potential aggregate deposit. Therefore, Project implementation would not result in the loss of a locally important mineral resource recovery site.

The development of the proposed school would not affect the conclusions in the Certified EIR related to mineral resources, and Project implementation would not cause a permanent loss of mineral resources valuable to the region and the state.

### 5.11.3 Adopted Mitigation Measures Applicable to the Proposed Project

No mitigation measures were identified in the Certified EIR, and the Proposed Project does not require any mitigation.

### 5.11.4 Level of Significance After Mitigation

The Proposed Project would result in no impact to mineral resources, and impacts would not be greater than those identified in the Certified EIR.

## 5.12 NOISE

### 5.12.1 Summary of Impacts in the Certified EIR and 2019 Addendum

The Certified EIR provides an analysis of noise impacts in Section 3.4. Impacts associated with noise were found to be less than significant with the implementation of mitigation measures.

- Traffic-generated noise was found to exceed San Diego County's standard of 60 community noise equivalent level (CNEL), resulting in a significant impact. This includes interior noise levels for multi-family units and exterior noise levels on second-floor balconies. Certified EIR Mitigation Measures M-N-1 (Noise Barriers) and M-N-2 (Noise Protection Easement) would reduce impacts to less than significant. Certified EIR Figure 3.4-4, Modeled Receivers and Noise Barrier Locations, identifies 8- and 9-foot noise barriers along Horse Ranch Creek Road, Shire Court, and southern perimeter, adjacent to the drainage basin of the Project Site.



- Stationary noise, including construction-generated noise and noise generated by Rosemary's Mountain Rock Quarry, were found to be less than significant. Noise from the wastewater treatment plant was found to be less than significant with the implementation of Mitigation Measure M-N-3 (Noise Barrier).

The Updated Plan moved land uses within the Planning Areas, updated the grading plan, and proposed the installation of new sewer mains in lieu of installing a wastewater treatment facility. It also discussed the effects of the County's update to their General Plan Noise Element standards, which increased the noise compatibility standard for multifamily, park, and school uses from 60 CNEL to 65 CNEL. Based on the Updated Plan and changes to the noise compatibility standard, the 2019 Addendum determined that Mitigation Measures M-N-2 and M-N-3, which proposed noise barriers at proposed multi-family residential, park, and school uses, and noise barriers at PA-1 and PA-5 were no longer required. Figure 16b of the 2019 Addendum showed unmitigated noise contours at the Project Site to be less than 55 CNEL.

### 5.12.2 Impacts Associated with the Proposed Project

The analysis in this section is based in part on the following technical report:

- Noise Impact Assessment for the Bonsall Unified School District Citro School Project. San Diego County, California. ECORP Consulting, Incorporated. March 2023.

Complete copies of the report are included in Appendix H of this Addendum.

Since the previous EIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that result in one or more effects from noise including: exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies; exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels; a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project; a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project; for projects located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, or for projects within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

Yes  
☐

No  
☒

**Proposed School Use Noise Compatibility.** The County of San Diego uses the land use compatibility table presented in the General Plan Noise Element to determine the compatibility of new land uses relative to existing noise levels. According to the land use compatibility table, an acceptable noise level for a school is less than 65 dBA CNEL. Based on the maximum design speed of 55 miles per hour on Horse Ranch Creek Road, the segment of Horse Ranch Creek Road adjacent to the Project Site would generate noise levels of 65.8 dBA CNEL at 100 feet from the centerline, which is above the threshold. Prior to the opening of the school, school area signs would be installed to reduce speeds along Horse Ranch Creek Road to 25 miles per hour. The slower vehicular speeds during school operation hours would reduce the noise generated

from Horse Ranch Creek Road to between 62.4 and 62.7 dBA CNEL, which is below the threshold. Therefore, consistent with the 2019 Addendum, noise barriers are not required at the Project Site.

The building materials used for the proposed school would be selected to attenuate noise. The exterior-to-interior noise reduction of newer buildings is generally 30 dBA or more. Accordingly, interior noise levels inside the proposed school buildings would be 32.7 dBA or less, which is less than the state's threshold of 45 dBA for classrooms. Therefore, the proposed school's ambient exterior and interior noise levels would be less than significant.

**Construction Noise.** The Proposed Project would cause temporary noise increases from on-site construction activities. Construction activities were estimated on a worst-case basis at levels that may occur at the nearest noise-sensitive receptors. Levels were estimated by three construction phases, including site preparation, grading, and combined building construction, paving, and architectural coating activities. Estimated noise levels were 68.5, 69.1, and 70 dBA for each phase, respectively, which are below the County limit of 75 dBA for an eight-hour period, between 7:00 AM and 7:00 PM for construction activities.

Project construction would also result in additional traffic on adjacent roadways. It is projected that the maximum number of construction trips traveling to and from the Project Site during a single construction phase would be 158 daily trips. According to Caltrans, a doubling of traffic on a roadway is required to result in an increase of 3 dB, which is the significance threshold. The Project Site would be accessed from I-15, via SR 76 and Horse Ranch Creek Road, which currently accommodates 15,100 average daily trips and between 5,000 and 8,000 average daily trips, respectively. Therefore, construction trips would not result in a doubling of traffic on the nearby roadways, and off-site construction traffic noise would not be perceptible.

**Operational Noise.** Future operational noise levels on the surrounding streets were modeled for the proposed school. The analysis is based on the Proposed Project's traffic volumes. The analysis determined that the traffic generated by the proposed school would not increase the existing noise levels by over 10 decibels above preexisting noise, which is the County's threshold for roadway noise impacts. In fact, with the reduced speed limit of 25 miles per hour along the segment of Horse Ranch Creek Road close to the school, the existing noise level of 65.8 dBA at 100 feet from the centerline of Horse Ranch Creek Road would be reduced to between 62.4 and 62.7 dBA CNEL.

Proposed school operations would generate noise from on-site vehicle circulation, door slamming, recess activities, and student talking and yelling. Noise levels at urban schools averaged 63.7 dBA and peaked at 85 dBA. Student drop-off and pickup activities can be expected to generate noise levels of 64.6 dBA at the source, and student lunch/recess activities can generate noise levels of 68.6 dBA at the source. The design of the school would minimize operational noise impacts on surrounding noise sensitive uses. The student loading zones are proposed on-site, and the proposed two-story classroom buildings and gymnasium proposed along the northern and western perimeters would attenuate noise generated by school operations. Noise levels at the closest sensitive receptors would be below the County threshold of 50 dBA for residential uses. Therefore, operational noise impacts would be less than significant.

**Groundborne Vibration.** Increases in groundborne vibration levels attributable to the Proposed Project would be primarily associated with short-term construction activities. Construction-related ground vibration is normally associated with impact equipment such as pile drivers, jackhammers, and the operation of some heavy-duty construction equipment, such as dozers and trucks. The Project Site is rough graded. Site development would require ground improvements, including aggregate piers, to support buildings proposed above liquefiable soils. Depending on the construction equipment used, vibration at the nearest structure to the Project Site would experience up to 0.002 peak particle velocity (PPV) and would not exceed the Federal Transit Administration accepted threshold of 0.2 PPV. Additionally, Project operations would not include the use of any large-scale stationary equipment that would result in excessive vibration levels. Therefore, groundborne vibration and noise caused by Project construction and operations would be less than significant, and no mitigation is required.

The Project Site is not located within an airport land use plan or two miles of an airport; the closest airport is the Fallbrook Community Airpark Airport, 6.4 miles to the east. Project implementation would not affect airport operations or increase exposure of noise-sensitive uses to aircraft noise.

Project impacts relative to noise and vibration would not be greater than those analyzed in the Certified EIR, and no mitigation measures would be required.

### 5.12.3 Adopted Mitigation Measures Applicable to the Proposed Project

The following mitigation measures were identified in the Certified EIR. Applicability of each mitigation measure has been evaluated. The mitigation measures have been modified where appropriate to reflect the Proposed Project.

~~M-N-1. The Proposed Project shall construct noise attenuation barriers ranging from three to ten feet along the edge of the residential pads, as shown in Figures 3.4-4 and 3.4-7. Barriers shall be free of cracks and holes. The transmission loss through a barrier should be at least 10 decibels greater than the estimated barrier attenuation (Federal Highway Administration 1979:34). If a barrier attenuates noise levels by 10 decibels at a receiver location, the barrier transmission loss must be at least 20 decibels to prevent audible noise from traveling through the barrier and adding to the acoustical environment. Examples of acceptable barrier materials include, but are not limited to, masonry block, wood frame with stucco, 0.5-inch-thick plexiglass, or 0.25-inch-thick plate glass. If transparent barrier materials are used, no gaps shall occur between the panels.~~

~~Figure 3.4-6 shows the barriers that would be required if the Campus Park project was constructed before the Proposed Project. As shown in Figure 3.4-6, several noise barriers at the southwest portion of Planning Area 1 as shown on Figure 3.4-4 would not be required with development of the Campus Park project.~~

~~M-N-2. A noise protection easement shall be placed on those lots where exterior noise levels exceed 60 CNEL to assure that at such time as architectural plans are available, and prior to the issuance of building permits, an interior acoustical analysis shall be conducted in~~

~~accordance with the State Building Code and County standards. If interior allowable noise levels are met by requiring that windows be unopenable or closed, the design for the structure must also specify a ventilation or air conditioning system to provide a habitable interior environment, as stated in the State Building Code. For exterior balconies, the acoustical analysis will determine the height and make up of acoustical barriers, also in accordance with State Building Code and County standards.~~

~~M-N-3. To reduce noise levels from the WWTP, the Proposed Project shall construct a nine-foot barrier at the property line south of Planning Area 1 and north of SR-76 and a seven-foot barrier proposed south of the WWTP site. The seven-foot barrier shall consist of a six-foot wall on top of a one-foot landscaped berm.~~

#### 5.12.4 Level of Significance After Mitigation

The Proposed Project's noise and vibration impacts are less than significant and no mitigation is required. The Proposed Project would not result in a new or substantially more severe significant impact compared with the significance determination as documented in the Certified EIR.

### 5.13 POPULATION AND HOUSING

#### 5.13.1 Summary of Impacts in the Certified EIR and 2019 Addendum

The Certified EIR determined that the Approved Project on a project-level and cumulative basis would have less than significant impacts on population and housing because neither the Approved Project nor in conjunction with the related projects would displace any housing.

The 2019 Addendum concluded that there would be no overall increase of severity of demands on population and housing beyond those analyzed in the Certified EIR.

#### 5.13.2 Impacts Associated with the Proposed Project

Since the previous EIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that result in one or more effects to population and housing including displacing substantial numbers of existing housing or people, necessitating the construction of replacement housing elsewhere?

Yes  
☐

No  
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The Project Site consists of graded, vacant land. There is no housing or people on the Project Site that would be demolished or displaced. No impact on population and housing would occur, and no mitigation would be required.

### 5.13.3 Adopted Mitigation Measures Applicable to the Proposed Project

No mitigation measures were identified in the Certified EIR, and the Proposed Project does not require any mitigation.

### 5.13.4 Level of Significance After Mitigation

The Proposed Project would result in no impact to population and housing, and impacts would not be greater than those identified in the Certified EIR.

## 5.14 PUBLIC SERVICES

### 5.14.1 Summary of Impacts in the Certified EIR and 2019 Addendum

The Certified EIR analyzed impacts related to schools, fire and police protection, and solid waste services and concluded that the Approved Project would not add demands to public safety and service providers that would require the provision of new or physically altered governmental facilities. The Certified EIR identified that impacts to fire protection, police protection, schools, and solid waste services would be less than significant.

The 2019 Addendum concluded that the Updated Plan would not increase of the severity of demands on public services beyond those analyzed in the Certified EIR.

### 5.14.2 Impacts Associated with the Proposed Project

Since the previous EIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that result in one or more substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the following public services: fire protection, police protection, schools, parks, or other public facilities?

Yes  
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No  
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The proposed school would be served by the North County Fire Protection District, Station Four at 4375 Pala Mesa Drive in Fallbrook. Station Four is approximately 3 miles west of the Project Site. The design and construction of the proposed school would include features to enhance fire protection safety such as non-combustible and fire-resistant building materials, vegetation selected for fuel treatment, fire access lanes, and fire hydrants. The proposed Site plan would be reviewed by the North County Fire Protection District to confirm adequate fire access, hydrants, and water flow. The proposed school would have an increased enrollment capacity, compared to that assumed under the Approved Project. The proposed expanded operations would not induce population growth, however, and trigger additional fire protection services and facilities.



The proposed school would be served by the San Diego County Sheriff Department's Fallbrook Substation (388 East Alvarado Street, Fallbrook), approximately 8.5 miles northwest of the Site. Modified school operations would not be substantial and would therefore not require additional law enforcement services and facilities.

The proposed school would not result in the generation of students and a need for school services. The Project would serve an existing need to offer school facilities to District students generated from the Approved Project and students in the surrounding area, including east of I-15 and north of West Lilac Road. It would have a beneficial effect on school services. The Proposed Project would not increase the population in the region which would require expanded school services and facilities.

The proposed school would include an indoor gymnasium and outdoor recreation facilities for school use and the community when not used by the school; therefore, the Project would not require off-site park facilities. The proposed school would operate its own library, nursing, and counseling facilities and would not require off-site public libraries, hospitals, senior centers, or childcare.

Therefore, Project impacts on public services would not be greater than those analyzed in the Certified EIR.

#### **5.14.3 Adopted Mitigation Measures Applicable to the Proposed Project**

No mitigation measures were identified in the Certified EIR, and the Proposed Project does not require any mitigation.

#### **5.14.4 Level of Significance After Mitigation**

The Proposed Project's impacts to public services are less than significant and would not be greater than those identified in the Certified EIR.

### **5.15 RECREATION**

#### **5.15.1 Summary of Impacts in the Certified EIR and 2019 Addendum**

The Certified EIR concluded that the Approved Project would be consistent with all recreational goals and policies in the Fallbrook Community Plan, Interstate 15/Highway 76 Master Specific Plan, and County General Plan, as assessed in the San Diego County General Plan Compliance Report for the Approved Project (Appendix K of the Certified EIR).

The 2019 Addendum relocated the proposed neighborhood park from PA 3 to PA 1, as shown in Figure 5: Meadowood Specific Plan Land Use Plan, which increased the total private and public park acreage from 5.7 net acres to 8.1 net acres. The 2019 Addendum concluded that there were no changes to the Certified EIR conclusions pertaining to recreation, and no new mitigation would be required.

#### **5.15.2 Impacts Associated with the Proposed Project**

Since the previous EIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that result in an

increase in the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated; or that include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

Yes  
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No  
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The proposed school includes indoor and outdoor recreational facilities. Project operations would not require use of off-campus recreation facilities. Additionally, the Proposed Project would not require the construction or expansion of additional recreational facilities, or affect those in the Approved Project. When not used by the school or District, the proposed school's recreational facilities would be available for community use. No impact on recreation facilities would occur.

#### 5.15.3 Adopted Mitigation Measures Applicable to the Proposed Project

No mitigation measures were identified in the Certified EIR, and the Proposed Project does not require any mitigation.

#### 5.15.4 Level of Significance After Mitigation

The Proposed Project would result in no impact to parks and recreational facilities. Impacts would not be greater than those analyzed in the Certified EIR.

### 5.16 TRANSPORTATION/TRAFFIC

#### 5.16.1 Summary of Impacts in the Certified EIR and 2019 Addendum

The Certified EIR provides an analysis of transportation/traffic impacts in Section 2.3.

The Approved Project was estimated to generate a worst-case scenario of 8,740 average daily traffic, 965 AM peak hour trips, and 864 PM peak hour trips. The Approved Project was projected to have direct and cumulative impacts to intersections and street/State Route segments at Old Highway 395/Reche Road and along two segments of SR-76 from Via Monserate to Gird Road and SR-76 from the I-15 southbound ramp to the I-15 northbound ramp. Certified EIR Mitigation Measure M-TR-1 would reduce intersection impacts to below significance. Certified EIR Mitigation Measure M-TR-2 mitigates impacts at two segments along SR-76; because the mitigating improvements would be within the purview of Caltrans and the County could not guarantee their implementation, the impact remained significant and unavoidable (Note: Mitigation Measure M-TR-2 was completed in 2017). The Approved Project included a Traffic Control Plan that was required to receive approval by the San Diego County Department of Public Works prior to the start of any grading activity. The Traffic Control Plan would manage construction-related trips and plan approval would ensure that construction-related traffic impacts would be less than significant.

Cumulative traffic impacts were identified at 19 intersections and 14 roadway segments. The Certified EIR determined that payment into the County's Traffic Impact Fee program would mitigate these cumulative impacts to less than significant (Mitigation Measures M-TR-3 and M-TR-4). However, the Certified EIR

notes that multiple projects were proposing development that would change the existing land usages to urban land uses, which would result in an increase to traffic-related impacts. The increase in both direct and cumulative traffic related within the region would be unavoidable.

The 2019 Addendum included a Trip Generation Reduction Change and Unit Shift Memo which assessed traffic impacts from the Updated Project. The analysis found a reduction of projected trips from the Certified EIR. Based on the Trip Generation Reduction Change and Unit Shift Memo, the 2019 Addendum concluded no new significant impacts would occur from the Updated Project, and no new mitigation would be required.

### 5.16.2 Impacts Associated with the Proposed Project

The analysis in this section is based in part on the following technical reports:

- Traffic Impact Analysis for the Propose Bonsall East K-8 School. East Side of Horse Ranch Creek Road South of Shire Court. San Diego County. Garland Associated. February 2023.
- Memorandum: Comparison of TK-8 School vs. TK-5/6 School for Traffic Analysis. Garland Associates. April 2023.

Complete copies of these studies are included in Appendices I and J of this Addendum.

Since the previous EIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause effects to transportation/traffic including: an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system; exceedance, either individually or cumulatively, of a level of service standard established by the county congestion management agency for designated roads or highways; a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks; substantial increase in hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); inadequate emergency access; inadequate parking capacity; and/or a conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?

Yes

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No

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A traffic impact analysis was prepared for the proposed school. The analysis assumed the operation of a 650-seat, TK-8 campus and refines traffic analysis conducted in the Certified EIR for the school component of the Approved Project, which assumed a generic trip rate for a 12.7-acre elementary school. The traffic study determined that trips generated by the proposed 650-seat school would not exceed thresholds, established by the County of San Diego and Caltrans, for roadway intersection impacts. A separate evaluation was later completed to determine whether operation of a worst-case scenario of an elementary-only (TK-5/6) campus, which would generate more vehicle trips, would cause a significant impact. The supplemental analysis concluded that the elementary-only scenario would result in slightly higher school-generated traffic volumes, but all of the study intersections would continue to operate at

acceptable levels of service, and roadway levels of service would be consistent as previously analyzed in the Certified EIR.

Sidewalks are available on both sides of Shire Court and Horse Ranch Creek Road, between SR-76 and Meadowood Street. Bike lanes are also available on both sides of Horse Ranch Creek Road of the same segment. Project construction could require the closure of these facilities near Project driveways. If it were to occur, the closure would be temporary, and the impacted areas would be restored after construction activities. Moreover, as a part of the Proposed Project, a traffic control plan would be prepared and construction-related activities would be managed, including the temporary closure of traffic lanes, sidewalks, and bike lanes. Public transit is currently not offered in the Meadowood Project area, and Project implementation would not impact transit facilities. The District would offer school bus services to the Project Site. Therefore, Project implementation would not conflict with an adopted program, plan, ordinance, or policy concerning roadway, pedestrian, bicycle, or transit facilities.

If the Proposed Project were approved, the District would coordinate with the County to implement traffic control for pedestrians, bicycles, and vehicles near the Project Site, consistent with the California Manual on Uniform Traffic Control Devices, Part 7, Traffic Control for School Areas. Appropriate school signage and roadway markings would be installed to warn motorists of the proposed school and to reduce speeds when children are present, including "SCHOOL - SPEED LIMIT 25 - WHEN CHILDREN ARE PRESENT." Additionally, due to the surrounding residential neighborhoods near the proposed school, it is recommended that the Horse Ranch Creek Road/Shire Court intersection be painted with two yellow school crosswalks: across the south side of Horse Ranch Creek Road and east side of Shire Court. The crosswalks should have a high visibility continental design. The final location of signages, markings, and crosswalks would be determined by the San Diego County Public Works Department, a Responsible Agency for the Proposed Project.

The design of the campus has been planned with separate vehicles and pedestrian access points and to limit vehicle-vehicle and vehicle-pedestrian conflicts. As shown in Figure 7, the school has a vehicular ingress-only driveway from Shire Court. The one-way access road loops along the northeastern perimeter of the campus to separate student and bus loading areas, the school parking lot, and egress at the southern end of the campus. The southern driveway could be used for ingress by school buses and emergency vehicles. Students who walk and bike to school would use the Horse Ranch Creek Road and Shire Court intersection, which would be painted yellow, as a school crosswalk. Pedestrian entry would be provided at the northeast corner of the Project Site from Shire Court. Bike racks would be provided at this entrance and near the administration building. Adequate parking (108 stalls) would be provided on the Project Site. The provision of parking would be compliant with San Diego County provisions for parking for junior high or middle schools as outlined in Section 6764 of the County's Zoning Ordinance, which requires 1 parking space per employee and 10 for visitors.

The segment of Horse Ranch Creek Road adjacent to the Project Site is a four-lane road with a raised center median. Due to the raised median in the center of Horse Ranch Creek Road, all vehicles existing the Project Site would be required to turn right. Vehicles accessing SR-76 would make a U-turn at the Horse Ranch Creek Road and Shire Court intersection, which has all-way stop signs. According to the traffic engineer, the distance between the school's south driveway and the intersection is about 850 feet. There

is sufficient room for vehicles to exit the driveway and move over to the left lane, while weaving with vehicles that are turning right onto Shire Court. Therefore, Project implementation would not increase hazards due to a geometric design feature or incompatible uses.

The long driveway to the on-site loading areas would remove vehicles from Horse Ranch Creek Road and Shire Court during drop-off and pickup activities. Additionally, the proposed access and circulation features at the school, including the driveways, on-site roadways, parking lots, and fire lanes, would be designed to accommodate emergency ingress and egress by fire trucks, police units, and ambulance/paramedic vehicles. The site plan would be reviewed by the North County Fire District for fire access. Emergency vehicles would be able to access the school grounds, buildings, and all other areas of the school, including the play fields, via on-site travel corridors. The Proposed Project would not result in inadequate emergency access.

Project impacts on traffic would not be greater than those analyzed in the Certified EIR, and no mitigation measures would be required.

### 5.16.3 Adopted Mitigation Measures Applicable to the Proposed Project

The following mitigation measures were identified in the Certified EIR. The applicability of each mitigation measure has been evaluated. The mitigation measures have been modified where appropriate to reflect the Proposed Project.

~~M-TR-1. The applicant shall install a traffic signal at the intersection of Old Highway 395 and Reche Road to the satisfaction of the Director of DPW.~~

~~M-TR-2. Direct impacts to study area street/State Route segments shall be mitigated through the construction of one additional travel lane in each direction. The Caltrans SR-76 project proposes the widening of SR-76 from Via Monserate to Gird Road and SR-76 from the I-15 SB ramp to I-15 the NB ramp. Should the Caltrans project not be completed prior to the Proposed Project, the applicant shall make a fair share contribution to be allocated to the widening of SR-76, if feasible.~~

~~M-TR-3. Cumulative impacts to study area intersections shall be mitigated through applicant participation in the TIF program.~~

~~M-TR-4. Cumulative impacts to study area street/State Route segments shall be mitigated through applicant participation in the TIF program.~~

### 5.16.4 Level of Significance After Mitigation

The Proposed Project's impacts to transportation/traffic are less than significant and would not be greater than those analyzed in the Certified EIR.



## 5.17 TRIBAL CULTURAL RESOURCES

### 5.17.1 Summary of Impacts in the Certified EIR and 2019 Addendum

The Certified EIR did not include an analysis of Tribal Cultural Resources (TCR). Assembly Bill 52 (AB 52), which requires TCR be evaluated under CEQA, became effective on July 1, 2015, after completion of the Certified EIR. Projects that require a Notice of Preparation of an EIR or Notice of Intent to Adopt a Negative Declaration or Mitigated Negative Declaration on or after July 1, 2015, are subject to AB 52. AB 52 does not apply to the Proposed Project since the document is an addendum, not a Negative Declaration, Mitigated Negative Declaration, or EIR.

Section 3.3 of the Certified EIR provides an analysis of archaeological resources and human remains. Subsequent to completion of the Certified EIR, a TCR was identified within the boundaries of the Approved Project, but not on the Project Site. The 2019 Addendum reduced the potential loss of the TCR by capping the area with no disturbance to native soils and implementing Certified EIR Mitigation Measures M-CR-1 through M-CR-5. As such, the TCR impacts were concluded to be less than significant with mitigation incorporated.

### 5.17.2 Impacts Associated with the Proposed Project

Since the previous EIR was certified or previous Negative Declaration was adopted, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause one or more effects to tribal cultural resources including: causing a change in the significance of a tribal cultural resource as defined in Public Resource Code Section 21074?

Yes

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No

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The Project Site is not listed in the California Register of Historical Resources. The Proposed Project is not subject to the AB 52 process. As discussed in Section 5.5.2, although the Project Site has been rough graded, there is potential for discovery of subsurface resources on the Project Site and the District would implement Certified EIR Mitigation Measure M-CR-3. Mitigation Measure M-CR-3, as modified, would require monitoring of the proposed aggregate piers by a County-approved archaeologist and a Luiseño Native American. In the event unique archaeological resources are identified, including TCR, the archaeologist would take appropriate actions to comply with state law. Therefore, potential impacts related to undiscovered TCR would be reduced to less than significant, and no additional mitigation is required.

### 5.17.3 Adopted Mitigation Measures Applicable to the Proposed Project

Addendum Section 5.5.3, above, lists the mitigation measure identified in the Certified EIR that concerns the monitoring of potential subsurface tribal cultural resources (M-CR-1 through M-CR-5). Of the five listed, only M-CR-3, as modified, would be applicable.

M-CR-3      **Archaeological Resources.** A County-approved archaeologist and a Luiseño Native American representative shall monitor ground improvements related to the installation of aggregate piers within areas of liquefiable soils on the Project site grading in the vicinity of Loc C, as well as the area north of existing SR-76. A Monitoring Discovery Plan shall be prepared prior to commencement of the installation of the aggregate piers construction activity, to be put in use in the event archaeological deposits are discovered. All artifacts recovered during all phases of survey, testing, and grading monitoring shall be curated with a Luiseño Native American Tribe. The collections and associated records shall be transferred to a Luiseño Native American Tribe within San Diego County.

If human remains are encountered, all ground-disturbance activities in the immediate vicinity of the discovery shall be halted and all requirements under Public Resources Code Section 5097.98 and the County of San Diego Guidelines for Cultural Resources shall be followed.

#### 5.17.4 Level of Significance After Mitigation

With the implementation of Certified EIR Mitigation Measure M-CR-3, potential impacts to tribal cultural resources would be less than significant.

### 5.18 UTILITIES AND SERVICE SYSTEMS

#### 5.18.1 Summary of Impacts in the Certified EIR and 2019 Addendum

The Certified EIR provides an analysis of utilities in Section 4.6, including the provision of water and wastewater services and facilities needed to meet the demand of the Approved Project. It concluded that the Approved Project would not add demands on public utilities that would require the construction of new or alteration of existing facilities. There are adequate water supply and wastewater services for the Meadowood Project.

The Updated Plan proposes sewer service to the Meadowood Project and eliminated the wastewater treatment plant. The Meadowood Project would reuse or recycle 100 percent of its wastewater. The Updated Plan's landscape water use would be reduced due to the project redesign with areas that would no longer require irrigation, updated ordinance requirements to increase use of drought-tolerant landscaping, and more water-efficient irrigation controllers, sprinklers, and plumbing fixtures. The 2019 Addendum concluded that there would be no overall increase or severity of demands on public services and utility systems beyond that previously analyzed in the Certified EIR. No new mitigation would be required.

#### 5.18.2 Impacts Associated with the Proposed Project

Since the previous EIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause effects to utilities and service systems including: exceedance of wastewater treatment requirements of the applicable Regional Water Quality Control Board; require or result in the construction of new water or

wastewater treatment facilities, new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects; require new or expanded entitlements to water supplies or new water resources to serve the project; result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments; be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs; and/or noncompliance with federal, state, and local statutes and regulations related to solid waste?

Yes

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No

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Utility systems for the Meadowood Project, including water, sewer, storm water drainage, natural gas, electric, and telecommunications facilities, have been constructed and installed to accommodate the uses as identified in the Certified EIR, including the proposed school. This includes an existing 8-inch water main, 8-inch sewer main, and 24-inch sewer main under Shire Court. There is a 48-inch storm drain along the eastern and southern boundaries of the Project Site and a 30-inch storm drain along the western portion of the Site. There is an existing 16-inch sewer main, 18-inch storm drain, 12-inch PVC water, irrigation main, and gas main existing under Horse Ranch Creek Road. The Proposed Project would connect to these facilities, which would be able to accommodate the increased school operations by roughly 150 students. Project implementation would not require additional or new infrastructure.

Public schools in California, including the proposed school, are required to comply with CALGreen building standards, which would require new facilities to install water-efficient plumbing fixtures for toilets and sinks, tankless water heater systems, and water-efficient irrigation systems with smart sensor controls, and require the use of recycled water for common area landscape irrigation and drought-tolerant plants in landscape design (that meet fuel modification requirements) to minimize irrigation on-site. The proposed increase in school capacity would not result in substantially greater demand for potable water than what was projected in the Certified EIR. Moreover, students not attending school at the Project Site would attend other schools in the region and require a similar water demand. The San Diego County Water Authority completed a master plan update in 2014 that identified adequate long-term water supply for the region, including for the Meadowood Project and related cumulative projects. The water authority is in the process of completing a 2023 Master Plan Update to identify adequate water sources for the region through 2045. The proposed school would have sufficient water supplies available for the reasonably foreseeable future.

The 2019 Addendum determined that wastewater treatment providers would have adequate capacity to serve the Approved Project which includes the school site. In 2020, the Rainbow Municipal Water District agreed to provide water and wastewater services for the entire Approved Project. The proposed school would result in a slight increase in wastewater generated. However, the proposed school would include water-efficient plumbing fixtures that would reduce water use; consequently, wastewater generated would not be substantially more than previously analyzed in the Certified EIR. The water district's wastewater treatment facilities would be able to accommodate the proposed school, and Project implementation would not require the expansion of facilities.

As noted in the Public Facility Element of the San Diego County General Plan, the region is served by nine landfills, including Miramar, Ramona, Sycamore, Otay, and Borrego, which have remaining capacity to accommodate the Meadowood Project, including the proposed school. Construction waste would be minimal, if any as the Project Site is vacant. Moreover, construction debris would be recycled and/or salvaged for reuse per CALGreen Section 5.408.1. The proposed school operations would not generate substantially more waste than previously analyzed. The District would provide recycling and organic bins at the proposed school, in compliance with AB 341 and AB 1826, respectively. The District would comply with all federal, state, and local management and reduction statutes and regulations governing solid waste disposal and diversion during Project construction and operation.

Project impacts on utilities and service systems would not be greater than those analyzed in the Certified EIR, and no mitigation measures would be required

### 5.18.3 Adopted Mitigation Measures Applicable to the Proposed Project

No mitigation measures were identified in the Certified EIR, and the Proposed Project does not require any mitigation.

### 5.18.4 Level of Significance After Mitigation

The Proposed Project would result in a less than significant impact to utilities and service systems, and impacts would not be greater than those identified in the Certified EIR.

## 5.19 MANDATORY FINDINGS OF SIGNIFICANCE

Since the previous EIR was certified, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that result in any mandatory finding of significance listed below?

*Does the project degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?*

*Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?*

*Does the project have environmental effects, which will cause substantial adverse effects on human beings, either directly or indirectly?*

Yes  
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No  
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The Proposed Project would require the implementation of Certified EIR Mitigation Measures (see Section 6) to reduce potentially significant impacts associated with construction activities to below significance. The mitigation measures would reduce impacts to air quality, off-site biological resources, and on-site archaeological resources. With the implementation of the mitigation measures, project design features, and BMPs described herein, the Proposed Project would not degrade the quality of the environment, eliminate important examples of California history or prehistory, cause cumulatively considerable effects, or cause adverse effects on human beings. The Proposed Project would not create any significant effects beyond what was identified in the Certified EIR. Therefore, the preparation of a subsequent or supplemental EIR is not required.

## **6 MITIGATION MONITORING AND REPORTING**

The District is required to adopt a program for monitoring or reporting on the implementation of the mitigation measures it has imposed to mitigate or avoid significant environmental effects. As allowed under CEQA Guidelines Section 15097(a), the District, as lead agency, may delegate reporting or monitoring responsibilities to another public agency or to a private entity which accepts the delegation, including but not limited to the Project's construction contractor. However, until the mitigation measures have been completed, the District remains responsible for ensuring that implementation of the mitigation measures occurs in accordance with the program.

The mitigation measures, as modified from the Certified EIR (~~striking through~~ for deletion and underline for addition), that are applicable to the Proposed Project are listed in the following table, Mitigation Monitoring and Reporting Plan, which has been prepared in conformance with CEQA Guidelines Section 15097. The table identifies the required mitigation measures, the entity(ies) responsible for implementing the mitigation measures, when the mitigation measures should be conducted, the entity responsible for ensuring the mitigation measures are implemented, and space for the monitor's signature and date to record when the measure was completed.



**Citro New School  
Mitigation Monitoring and Reporting Plan**

Mitigation Measure		Responsibility for Implementation	Timing	Responsibility for Monitoring	Monitor (Signature Required, Date of Compliance)
<b>Air Quality</b>					
M-AQ-2	During the architectural coatings (painting) phase of construction, the school district and/or its construction contractor shall use interior coatings with a VOC content less than or equal to 50 grams per liter and exterior coatings with a content less than or equal to 250 grams per liter.	Construction Manager	Construction	District	
M-AQ-4	To utilize Toxic-Best Available Control Technology (T-BACT) and mitigate for impacts, the school district and/or its construction contractor shall ensure that 10 percent of the construction fleet uses any combination of diesel catalytic converters, diesel oxidation catalysts, diesel particulate filters and/or CARB certified Tier I, II, or III equipment.	Construction Manager	Construction	District	
M-AQ-6	To ensure the use of T-BACT and mitigate for impacts, the school district and/or its construction contractor shall have 10 percent of the construction fleet use any combination of diesel catalytic converters, diesel oxidation catalysts, diesel particulate filters and/or CARB certified Tier I, II, or III equipment.	Construction Manager	Construction	District	
<b>Biological Resources</b>					
M-BR-3a	<p>Indirect impacts on the California gnatcatcher shall be mitigated by the following measures to be implemented by a qualified biologist:</p> <ul style="list-style-type: none"> <li>a. The project biologist shall meet with the owner, permittee or designee, and the construction crew to conduct an onsite educational session regarding the need to avoid impacts outside of the approved development area.</li> <li>b. During grading activities, Best Management Practices for erosion control shall be implemented and monitored as needed to prevent any significant sediment transport. These practices may include, but may not be limited to, the following: the use of materials such as sandbags; sediment fencing and erosion control matting to stabilize disturbed areas; and installation of erosion control materials, particularly on the downslope side of disturbed areas, to prevent soil loss.</li> <li>c. All construction activities shall take place only inside the fenced area. Grading materials shall be stored either inside the fenced development area or in an area approved by the project biologist.</li> <li>d. Nighttime lighting shall be shielded and directed away from coastal sage scrub habitat adjacent to the development. This shall be implemented through a Lighting Plan.</li> </ul>	Qualified Biologist	Prior to the Start of and During Construction	Construction Manager / District	

**Citro New School  
Mitigation Monitoring and Reporting Plan**

Mitigation Measure	Responsibility for Implementation	Timing	Responsibility for Monitoring	Monitor (Signature Required, Date of Compliance)
<p>M-BR-11 Impacts to nesting birds shall be mitigated through the following measures:</p> <ul style="list-style-type: none"> <li>a. Native and naturalized vegetation clearing shall not occur during the breeding season from -February 15 to September 15; However, Project construction activities may occur within this period with written concurrence from the District, the US Department of Fish and Wildlife (USFWS), and the California Department of Fish and Wildlife (CDFW) that nesting birds would be avoided. If vegetation removal is to take place during the nesting season, a biologist shall be present during vegetation clearing operations to search for and flag active nests so that they can be avoided.</li> <li>b. To avoid impacts to nesting raptors, any vegetation clearing or grubbing within 500 feet of trees suitable for raptor nesting shall not occur from February 1 to July 15. However, Project construction activities may occur within this period with written concurrence from the District, the USFWS, and the CDFW that nesting birds would be avoided. A County-approved biologist shall conduct pre-construction surveys in the adjacent habitat to determine the location of any active raptor nests in the area. The survey shall begin not more than ten days prior to the beginning of construction activities. During construction, no activity shall occur within 500 ft (152.4 m) of active raptor nests, unless measures are implemented to minimize the noise and disturbance to those adjacent birds. The District and/or its construction contractor may seek approval from the USFWS or CDFW if nesting activities cease prior to July 15.</li> <li>c. Potential impacts to nesting California gnatcatcher, least Bell's vireo, and southern willow flycatcher will be implemented through agency permitting and with M-BR-3b(c), M-BR-5b(c), and M-BR-7b(c), as follows.</li> </ul> <p>M-BR-3b(c). To avoid impacts to nesting gnatcatchers, vegetation clearing and grubbing within 500 feet of coastal sage scrub shall no occur in potential nesting habitat during the breeding season from February 15 through August 31. If project construction (other than clearing and grubbing of sensitive habitats) is necessary adjacent to preserved on and off-site habitat during the gnatcatcher breeding (or sooner if a Wildlife Agency-approved biologist demonstrates to the satisfaction of the Wildlife Agencies that all nesting is complete), a Wildlife Agency approved biologist shall conduct pre-construction surveys in the adjacent habitat to determine the location of any active gnatcatcher nests in the area. The survey shall begin not more than three days prior to the beginning of construction activities. The Agencies shall be notified if any nesting birds are found. During construction, no activity shall occur within 500 ft (152.4 m) of active gnatcatcher nesting territories, unless measures are implemented to minimize the noise and disturbance to those adjacent birds. Exceptions to this measure includes cases where surveys confirm that adjacent habitat is not occupied or where noise studies confirm that construction noise levels are below 60 dBA</p>	Qualified Biologist	Prior to the Start of and During Construction	Construction Manager / District	

**Citro New School  
Mitigation Monitoring and Reporting Plan**

Mitigation Measure	Responsibility for Implementation	Timing	Responsibility for Monitoring	Monitor (Signature Required, Date of Compliance)
<p>hourly Leq along the edge of adjacent habitat. If construction activities are not completed prior to the breeding season and noise levels exceed this threshold, noise barriers shall be erected to reduce noise impacts to occupied habitat to below 60 dBA hourly Leq and/or the culpable activities will be suspended until the end of the breeding season.</p> <p>M-BR-5b(c). To avoid impacts to nesting vireos, vegetation clearing and grubbing shall not occur within 500 feet of riparian habitat during the breeding season from March 15 to September 15. If project construction (other than clearing and grubbing of sensitive habitats) is necessary adjacent to preserved on- and off-site habitat during the vireo breeding (or sooner if a Wildlife Agency-approved biologist demonstrates to the satisfaction of the Wildlife Agencies that all nesting is complete), a Wildlife Agency-approved biologist shall conduct pre-construction surveys in the adjacent habitat to determine the location of any active vireo nests in the area. The survey shall begin not more than three days prior to the beginning of construction activities. The Agencies shall be notified if any nesting vireos are found. During construction, no activity shall occur within 500 ft (152.4 m) of active vireo nesting territories, unless measures are implemented to minimize the noise and disturbance to those adjacent birds. Exceptions to this measure includes cases where surveys confirm that adjacent habitat is not occupied or where noise studies confirm that construction noise levels are below 60 dBA hourly Leq along the edge of adjacent habitat. If construction activities are not completed prior to the breeding season and noise levels exceed this threshold, noise barriers shall be erected to reduce noise impacts to occupied habitat to below 60 dBA hourly Leq and/or the culpable activities will be suspended.</p> <p>M-BR-7b(c). To avoid impacts to nesting southern willow flycatchers, vegetation clearing and grubbing within 500 feet of riparian habitat shall not occur from May 1 to September 1. If project construction (other than clearing and grubbing of sensitive habitats) is necessary adjacent to preserved on- and off-site habitat during the flycatcher breeding (or sooner if a Wildlife Agency-approved biologist demonstrates to the satisfaction of the Wildlife Agencies that all nesting is complete), a Wildlife Agency approved biologist shall conduct pre-construction surveys in the adjacent habitat to determine the location of any active flycatcher nests in the area. The survey shall begin not more than three days prior to the beginning of construction activities. The Agencies shall be notified if any nesting flycatchers are found. During construction, no activity shall occur within 500 ft (152.4 m) of active flycatcher nesting territories, unless measures are implemented to minimize the noise and disturbance to those adjacent birds. Exceptions to this measure includes cases where surveys confirm that adjacent habitat is not occupied or where noise studies confirm that construction noise levels are below 60 dBA hourly Leq along the edge of adjacent habitat. If construction activities are</p>				

**Citro New School  
Mitigation Monitoring and Reporting Plan**

Mitigation Measure	Responsibility for Implementation	Timing	Responsibility for Monitoring	Monitor (Signature Required, Date of Compliance)
not completed prior to the breeding season and noise levels exceed this threshold, noise barriers shall be erected to reduce noise impacts to occupied habitat to below 60 dBA hourly Leq and/or the culpable activities will be suspended.				
M-BR-12 General indirect impacts associated with external community lighting shall be mitigated through all communal lighting associated with the project will be shielded and directed away from the urban/natural edge. The Proposed Project shall be designed to be in compliance with the San Diego County Light Pollution Code (Sections 59.101-59.115). A lighting plan shall be included in the grading plans which shows required lighting adjacent to the open space as being shielded, unidirectional, low pressure sodium illumination (or similar), and directed away from preserve areas using appropriate placement and shields.	Qualified Biologist	Prior to the Start of and During Construction	Construction Manager / District	
<b>Cultural Resources/Tribal Cultural Resources</b>				
M-CR-3 Archaeological Resources. A County-approved archaeologist and a Luiseño Native American representative shall monitor ground improvements related to the installation of aggregate piers within areas of liquefiable soils on the Project site. A Monitoring Discovery Plan shall be prepared prior to commencement of the installation of the aggregate piers, to be put in use in the event archaeological deposits are discovered. All artifacts recovered during all phases of survey, testing, and grading monitoring shall be curated with a Luiseño Native American Tribe. The collections and associated records shall be transferred to a Luiseño Native American Tribe within San Diego County.  If human remains are encountered, all ground-disturbance activities in the immediate vicinity of the discovery shall be halted and all requirements under Public Resources Code Section 5097.98 and the County of San Diego Guidelines for Cultural Resources shall be followed.	Qualified Archaeologist and Luiseño Native American Representative	During Ground Improvement Activities	Construction Manager / District	

## **7 REFERENCES**

- California Department of Conservation. n.d. California Important Farmland Finder. Accessed December 12, 2022. <https://maps.conservation.ca.gov/DLRP/CIFF/>.
- . n.d. CalGEM Well Statewide Track and Reporting System (WellSTAR). Accessed December 14, 2022. <https://maps.conservation.ca.gov/doggr/wellfinder/#openModal/-117.12813/33.35092/15>.
- California Department of Education. 2022. “Small School Site Guidelines.” Accessed September 3, 2022. <https://www.cde.ca.gov/ls/fa/sf/smallschoolsite.asp>.
- California Department of Toxic Substances Control. n.d. EnviroStor. Accessed March 7, 2023. <https://www.envirostor.dtsc.ca.gov/public>.
- California State Water Resources Control Board. n.d. GeoTracker. Accessed March 7, 2023. <https://geotracker.waterboards.ca.gov>.
- Construction Testing & Engineering, Inc. 2023. *Geotechnical Investigation. Potential New School Site*. April 7, 2023.
- County of San Diego. 2011. General Plan Noise Element. <https://www.sandiegocounty.gov/content/dam/sdc/pds/gpupdate/docs/GP/NoiseElement.pdf>.
- . 2018. Climate Action Plan. <https://www.sandiegocounty.gov/content/dam/sdc/pds/advance/cap/publicreviewdocuments/PostBOSDocs/San%20Diego%20County%20Final%20CAP.pdf>.
- . n.d. Zoning Ordinance. Part Six: General Regulations. Accessed April 27, 2023.
- ECORP Consulting, Inc. 2023. *Air Quality and Greenhouse Gas Emissions Assessment for the Bonsall Unified School District Citro School Project*. February 2023.
- . 2023. *Noise Impact Assessment for the Bonsall Unified School District Citro School Project*. San Diego, California. March 2023.
- Federal Emergency Management Agency. n.d. National Flood Hazard Layer Viewer. Accessed March 7, 2023.
- Garland Associates. 2023. Traffic Impact Analysis for the Proposed Bonsall East K-8 School. February 2023.
- . 2023. Memorandum: Comparison of TK-8 School vs. TK-5/6 School for Traffic Analysis. April 2023.
- Rincon. 2011. *Final EIR, Meadowood Specific Plan*. Prepared for County of San Diego.

San Diego Air Pollution Control District (SDAPCD). 2022. Letter from Dan Plotner, Program Coordinator, to Barbara Heyman, Michael Baker International, RE: Facilities within ¼ Mile of Proposed School Site, dated May 10, 2022.

San Diego County Department of Environmental Health and Quality. 2022. E-mail Correspondence from Edwin Andrus, Office Support Specialist, to Shannon Liska, Michael Baker International, RE: CalARP Facilities within ¼ Mile of Proposed School Site, dated May 6, 2022.

Swing, J. W. 1975. "Estimation of Community Noise Exposure in Terms of Day-Night Average Level Noise Contours." California Office of Noise Control, Department of Health, Berkeley, CA, May 1975. [https://opr.ca.gov/docs/OPR\\_Appendix\\_D\\_final.pdf](https://opr.ca.gov/docs/OPR_Appendix_D_final.pdf).



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## **Appendix A: Certified EIR**

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## **Appendix B: 2019 Addendum**

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## **Appendix C: Approved Plant List**



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## **Appendix D: Geotechnical Report**

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# **Appendix E: I-15 Corridor Scenic Preservation Guidelines**

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# **Appendix F: Air Quality and Greenhouse Emissions Assessment**



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# **Appendix G: Phase 1 Environmental Site Assessment**

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## **Appendix H: Noise Assessment**

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# **Appendix I: Traffic Impact Analysis**



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## **Appendix J: Traffic Memo**

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