VALLEY CENTER MUNICIPAL WATER DISTRICT

North Broadway Pipeline Relocation Project
Initial Study

Prepared by:

BIRDSEYE
PLANNING GROUP

March 2026

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INITIAL STUDY

1. Project title:

North Broadway Pipeline Relocation Project

2. Lead agency name and address:

Valley Center Municipal Water District
24900 Valley Center Drive
Valley Center, CA 92082

3. Contact person and phone number:

Fernando Carrillo, Project Manager
Valley Center Municipal Water District
(760) 735-4579

4. Project location:

The North Broadway Pipeline Relocation Project originates at the termination of an existing 10-inch water main on the north side of Kellrae Lane (if extended). From that connection, a new 12-inch water line, approximately 2,140 linear feet in length, would be installed east/southeast to North Broadway and then north within the North Broadway corridor to Sylvan Lane. From Sylvan Lane, an existing 12-inch line would be removed and replaced with a new 1,100 linear foot, 12-inch line between Sylvan Lane and the northern segment of the abandoned pipeline which terminates approximately 300 feet south of Paseo Del Norte. The new pipeline segment along Kellerae Lane (if extended) would be installed under an existing segment of Reidy Creek to avoid any impact to existing floodway, riparian vegetation and the steam bank. The project area is shown in Figure 1. The pipeline segments proposed for replacement and/or installation is shown in Figure 2. Figure 3 shows the proposed Horizontal Directional Drilling (HHD) boring and receiving pits along the north side of Kellrae Lane.

5. Project sponsor's name and address:

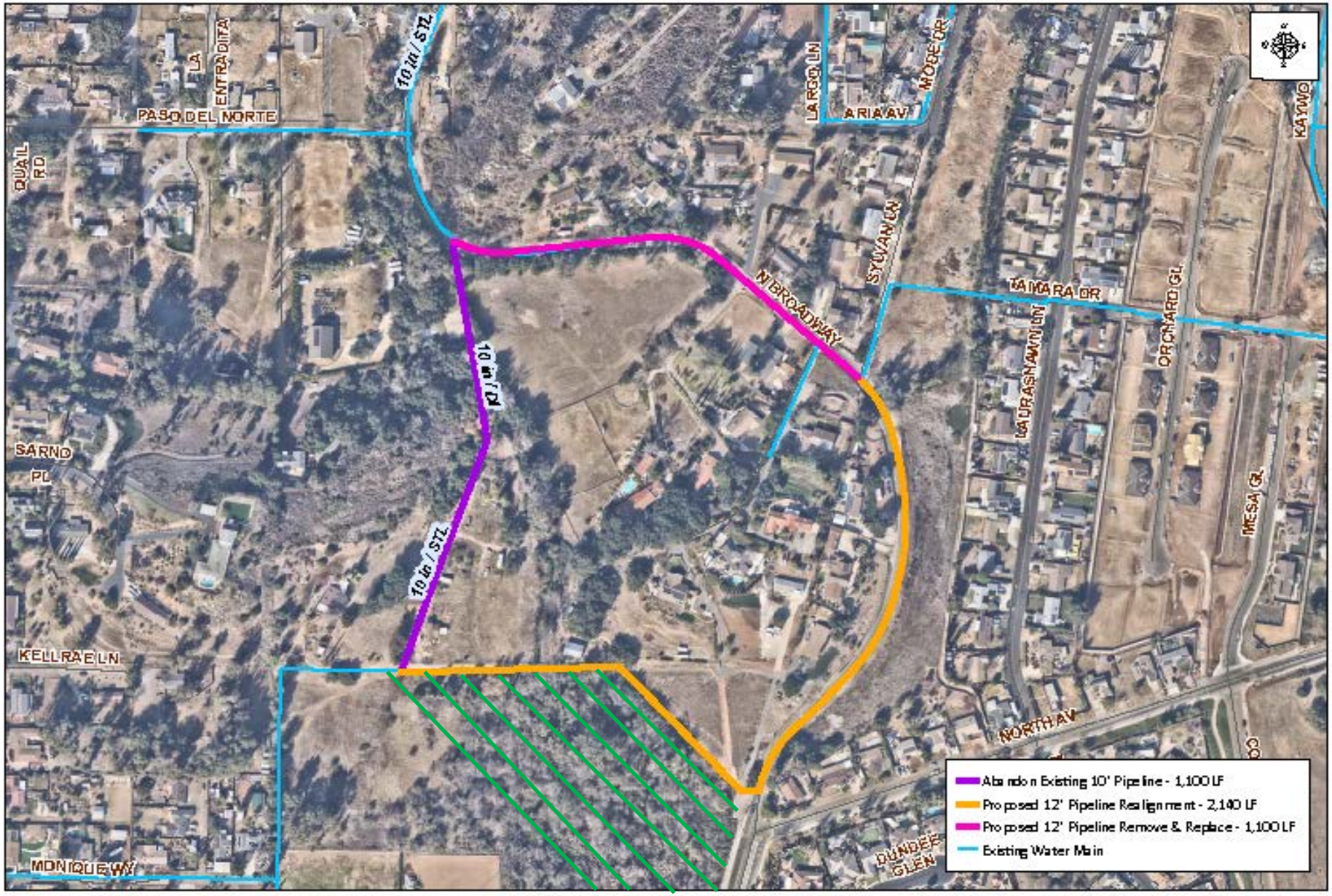
Valley Center Municipal Water District
24900 Valley Center Drive
Valley Center, CA 92082

6. General Plan designation:

Residential 20/Pre-Zone RE-20

Figure 1—Vicinity Map

- Project Area



VALLEY CENTER
MUNICIPAL WATER DISTRICT

NORTH BROADWAY
Pipeline Relocation Project

Figure 2—Proposed Pipeline Alignment

- Restrictive Covenant Area

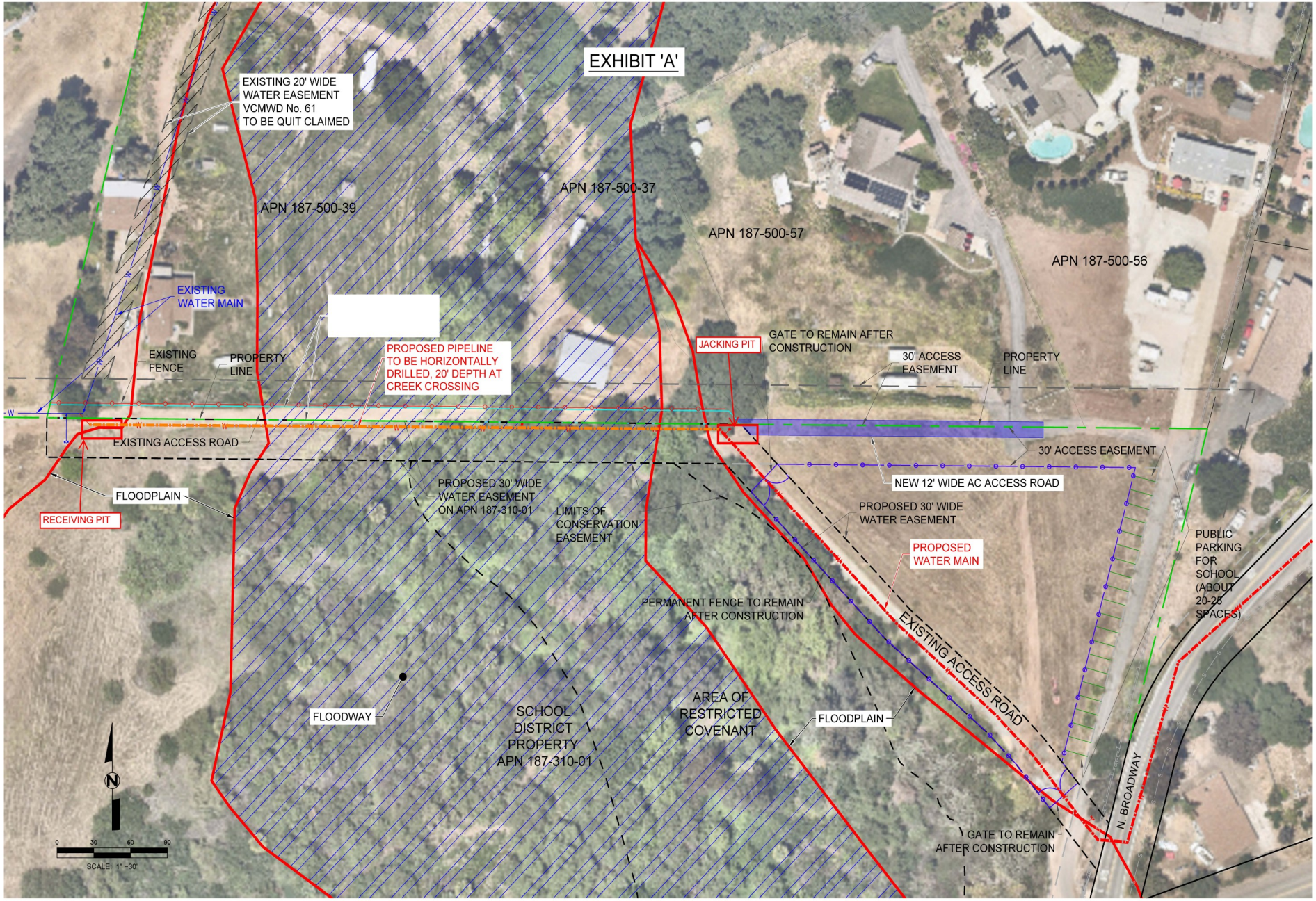


Figure 3—Directional Boring Segment

7. Zoning:

Residential Estate (RE-20), and Residential Agriculture

8. Description of project:

The Valley Center Municipal Water District (District) is proposing to abandon an existing segment of 10-inch water main that runs north/south from North Broadway, approximately 300 feet south of Paseo Del Norte, south to Kellrae Lane (if extended), a distance of approximately 1,100 linear feet. Kellrae Lane is an unimproved single-lane road running east/west and functions as a private driveway providing access to multiple single-family residences located west of North Broadway. With abandonment of the existing 10-inch pipeline, the project would require installation of a new 12-inch water main located along Kellrae Lane at the termination of the segment to be abandoned. This pipeline segment would run east under a segment of Reidy Creek and along the north side of Kellrae Lane for approximately 200 feet. The pipeline alignment then turns south under Kellrae Lane and runs along the eastern boundary of a restricted access property owned by the Escondido Unified School District EUSD) to the intersection with North Broadway, a distance of approximately 400 feet. The line would turn north and run within the North Broadway corridor terminating at Sylvan Lane. The total distance of new pipeline would be 2,140 linear feet. From Sylvan Lane, the project would remove and replace an existing 12-inch water main in the North Broadway corridor northwest to the northern segment of abandoned pipeline. This would complete a loop in that segment of pipeline. The distance of this segment is approximately 1,100 linear feet.

As stated, the Kellrae Lane segment would require the pipeline be installed under a segment of Reidy Creek. This would avoid impacts associated with placing infrastructure above-ground within a floodway. The Kellrae Lane segment would be installed using Horizontal Directional Drilling (HDD) methods. The boring pit would be constructed on the east end of the segment. The receiving pit would be constructed on the west end of the segment west of Reidy Creek and the adjacent riparian vegetation. The maximum pipeline depth would be approximately 20 feet below grade at the point below Reidy Creek. The project would have no impact to Reidy Creek, adjacent riparian vegetation, floodway or Restrictive Covenant area as described below.

As stated, a segment of the pipeline would traverse along the east side of an 11.88-acre restricted access property owned by the EUSD (Assessor Parcel Number 187-310-01-00) and located north of Reidy Creek Elementary School. This property is a mitigation area over which a Restrictive Covenant was granted in favor of the U.S. Army Corps of Engineers, on a 6.34-acre portion as compensatory mitigation for impacts associated with development of Reidy Creek Elementary School. Figure 2 depicts the Restrictive Covenant relative to the proposed project alignment. The mitigation was implemented per conditions of approval contained in the U.S. Army Corps of Engineers Nationwide Permit 39 (No. 200300874-RRS), the San Diego Regional Water Quality Control Board Section 401 Permit (No. 03C-061) and the California Department of Fish and Wildlife Streambed Alteration Agreement R5-2003-0173 all as further set forth in the Restrictive Covenant. The segment of the pipeline proposed for construction east of the

Restrictive Covenant would be outside the property boundary within a 30-foot wide easement granted by EUSD. The project would have no direct impact to property within the Restrictive Covenant; however, mitigation measures will be implemented as identified herein to address temporary indirect impacts to biological resources occurring within the Restrictive Covenant during construction. As a condition of the easement, VCMWD will pave a 215-foot section of Kellrae Lane (if extended) the runs along the northern EUSD property boundary generally west of North Broadway to the Restrictive Covenant boundary. With the exception of the paved area, the disturbance area would be limited to the construction phase and all disturbed soil areas would be restored to preconstruction conditions. No revegetation would occur as part of the project.

The remainder of the pipeline would be installed within the North Broadway corridor. Typical excavation depth would range from 6-10 feet below existing grade. All materials and equipment would be staged within the active construction area, within disturbed areas located adjacent to the corridor or at existing VCMWD properties located in proximity to the construction area. The vacant parcel located adjacent to and east of the Restricted Covenant area may also be used for staging.

Construction of the project is expected to begin in summer 2026 and occur over a 6-8 month period. All construction would occur Monday-Friday from 7:00 a.m. to 5:00 p.m. No holiday or weekend work would occur.

9. Surrounding Land Uses and Setting

The North Broadway project site segments are located adjacent to and north of Kellrae Lane (i~~I~~f extended), east of the EUSD Restricted Property and within the North Broadway corridor north to approximately 300 feet south of Paseo Del Norte as depicted in Figure 2. Undeveloped open space and large single-family lots and related uses are the dominant land use in the project area. Reidy Creek Elementary School is located approximately 850 south/southwest of the closest construction area.

10. Other public agencies whose approval is required:

Escondido Unified School District – permanent pipeline easement and temporary access easement for construction staging.

No other permits or approvals from agencies other than VCMWD would be required.

11. Other public agencies and organizations that will be notified as requested by Escondido Union School District.

VCMWD , in reliance on its environmental consultants, understands that approval of the U.S. Army Corp of Engineers, California Regional Water Quality Control Board and the California Department of Fish and Wildlife is not required. VCMWD's Project and corresponding

Easements are being proposed outside of the Restrictive Covenant. In this case, the resource agencies only have jurisdiction over the Restrictive Covenant and not over non-jurisdictional features outside the Restrictive Covenant. Regardless, the Escondido Union School District has requested, and the VCMWD has agreed to provide those agencies with a copy of the Mitigated Negative Declaration and all reports, exhibits and addenda and an opportunity to comment. This is in addition to circulating the documentation through the State Clearinghouse for a 30-day comment period.

In addition, the VCMWD has agreed to provide notice and an opportunity to comment to the Escondido Creek Conservancy and the Escondido Fire Department.

12. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, has consultation begun is there a plan for consultation?

A Phase I Cultural Resources Report was prepared for the proposed project. As part of the process, a Sacred Lands File (SLF) search was conducted by the Native American Heritage Commission. Tribal representatives identified as part of the SLF search were noticed during preparation of the Phase I Cultural Resources Report. Responses are provided as part of the Phase I Cultural Resources Report (Appendix C). VCMWD has performed outreach per AB 52. AB 52 notification letters were sent to Native American Tribes requesting consultation on October 29, 2025. Two responses were received. Consultation meets with the two tribes were conducted on January 12, 2026. The results are summarized in Section XVIII, Tribal Cultural Resources.

ENVIRONMENTAL FACTORS AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is "Potentially Significant" or "Potentially Significant Unless Mitigation Incorporated" as indicated by the checklist on the following pages.

☐ Aesthetics	☐ Agriculture and Forest Resources	☐ Air Quality
☒ Biological Resources	☒ Cultural Resources	☐ Energy
☐ Geology/Soils	☐ Greenhouse Gas Emissions	☐ Hazards & Hazardous Materials
☐ Hydrology/Water Quality	☐ Land Use/Planning	☐ Mineral Resources
☐ Noise	☐ Population/Housing	☐ Public Services
☐ Recreation	☐ Transportation	☒ Tribal Cultural Resources
☐ Utilities/Service Systems	☐ Wildfire	☒ Mandatory Findings of Significance

DETERMINATION:

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 potential 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.

_____ March 20, 2026

Signature Date

ENVIRONMENTAL CHECKLIST

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
I. <u>AESTHETICS</u> – would the project:				
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☐	☒
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public view of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☐	☒

a) The Valley Center Community Plan (amended August 2014), which includes the project area, provides planning and policy guidance for development within the Valley Center community. No specific visual features are noted in the community plan; however, policy guidance references preservation of environmentally significant and/or sensitive resources such as undisturbed steep canyons/slopes, oak woodlands, archaeological sites and ecologically sensitive areas.

Views within the project area are dominated by large single-family lots, agricultural and equestrian operations and related uses associated with a rural residential environment as well as mature vegetation dominated by various native and ornamental species. The proposed pipeline segments, with the exception of the Reidy Creek span, would be located below ground

within existing easements. The presence of construction equipment would temporarily change views during construction activities. The Reidy Creek span would be located adjacent to the existing bridge and only a small number of residents would see that location. Post-construction, existing scenic views would be unchanged. **No impact** to scenic vistas would occur.

b) There are two designated scenic highways in San Diego County as defined in the Scenic Highway Element of the San Diego General Plan (1986). The nearest state-designated scenic highway to the study area is the segment of State Route 78 (SR-78) within the Anza-Borrego Desert Park approximately 26 miles southeast of Valley Center. The pipeline alignment is located in varied topography and in proximity to mature native trees, the Reidy Creek corridor and other natural features. The alignment is not located in proximity to historic structures, rock outcroppings or other visually prominent features. **No impact** to these resources would occur as a result of the proposed project.

c) The presence of construction equipment and materials would temporarily change views. The above-ground segment of the pipeline crossing Reidy Creek would be permanently visible; however, as discussed, the alignments do not have any distinctive visual characteristics, and like the existing infrastructure, the new pipeline segment, with one exception, would not be visible. Thus, implementation of the pipe replacement program would not substantially degrade the visual character of the site or surrounding areas. At completion, the existing views would be restored. Impacts would be **less than significant**.

d) The proposed project would install a new and/or replace an existing pipeline within easements. Temporary construction lighting may be visible if construction occurs during hours of darkness. This is not anticipated. No sources of light and glare are associated with the project. **No impacts** would occur under this threshold.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
II. <u>AGRICULTURE AND FOREST RESOURCES</u> -- Would the project:				
a) Convert Prime Farmland, Unique Farmland, Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
II. <u>AGRICULTURE AND FOREST RESOURCES</u> -- Would the project:				
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?	☐	☐	☐	☒

a) The project area is zoned for residential estate development. No agricultural uses occur within proximity to the proposed alignment. No portions of the project vicinity are designated for agricultural use. **No impact** would occur under this threshold.

b) Implementation of the proposed project would have no effect on existing or future land use. The majority of the project would occur within or adjacent to existing road corridors. The segment adjacent to the EUSD Restricted Property is not in a Williamson Act contract. **No impact** would occur under this threshold**.**

c-e) No land within the project area is designated for or used for timber production. The project would not conflict with any zoning designations designed to preserve timber or agricultural resources. The project would not involve other changes in the existing environment which, due to their location or nature, could result in conversion of farmland, to non-agricultural use. **No impact** would occur under this threshold.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
III. <u>AIR QUALITY</u> -- Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☐	☒
b) Result in 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?	☐	☐	☒	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

Information within this section was obtained from the *Valley Center Municipal Water District North Broadway Pipeline Replacement Project Air Quality Calculations* (Birdseye Planning Group, April 2025) (Appendix A).

a) According to South Coast Air Quality Management District (SCAQMD) Guidelines, to be consistent with the Air Quality Management Plan (AQMP), a project must conform to the local General Plan and must not result in or contribute to an exceedance of the County's projected population growth forecast. The proposed project does not include residential development that would result in population growth in excess of forecasts for San Diego County. The project would not conflict with the San Diego General Plan or Valley Center Community Plan.

The Regional Air Quality Strategy (RAQS) is based on information from the California Air Resources Board and San Diego Association of Governments ((SANDAG), including projected growth in the County, mobile, area and all other source emissions to project future emissions and determine from that the strategies necessary for the reduction of stationary source emissions through regulatory controls. Projects that propose development that is consistent with the growth anticipated by the general plan is consistent with the AQMP and RAQS. The proposed project would not add housing, increase employment or traffic. Construction

emissions would be temporary and below the daily emission standards referenced herein. Thus, the proposed project would be consistent with the Air Quality Management Plan and RAQS. **No impact** would occur under this threshold.

b) Appendix G of the CEQA Guidelines (14 CCR 15000 et seq.) indicates that, where available, the significance criteria established by the applicable air quality management district or pollution control district may be relied upon to determine whether the project would have a significant impact on air quality. As part of its air quality permitting process, SDAPCD has established thresholds in Rule 20.2 requiring the preparation of Air Quality Impact Assessments for permitted stationary sources. SDAPCD establishes quantitative emission thresholds for stationary sources. Although these trigger levels do not generally apply to mobile sources or general land development projects, for comparative purposes these levels may be used to evaluate the increased emissions that would be emitted into the SDAB from proposed land development projects. Project-related air quality impacts estimated in this environmental analysis would be considered significant if any of the applicable significance thresholds presented below in Table 4 are exceeded.

The thresholds listed in Table 1 are screening-level thresholds used to evaluate whether proposed-project-related emissions could cause a significant impact to air quality. The project would have no post-construction emissions; thus, only construction emission standards are shown. Emissions below the screening-level thresholds would not cause a significant impact. The emissions-based thresholds for ozone precursors (ROG and NOx) are intended to serve as the threshold for ozone. This approach is used because ozone is not emitted directly; thus, ozone concentrations associated with individual projects precursor (ROG and NOx) emissions cannot be determined through air quality models or other quantitative methods. For nonattainment pollutants, if emissions exceed the thresholds shown in Table 1, the project has the potential to result in a cumulatively considerable net increase in these pollutants; and thus, could have a significant impact on the ambient air quality.

Table 1
SDAPCD Air Emission Significance Thresholds

Construction Emissions	
Pollutant	Total Emissions (pounds per day)
Reactive Organic Gas (ROG)	75
Nitrogen Oxides (NOx)	250
Carbon Monoxide (CO)	550
Sulfur Oxides (SOx)	250
Respirable Particulate Matter (PM_{10})	100
Fine Particulate Matter (PM2.5)	55

With respect to odors, SDAPCD Rule 51 (Public Nuisance) prohibits emission of any material that causes nuisance to a considerable number of persons or endangers the comfort, health, or safety of any person. A project that involves a use that would produce objectionable odors would be deemed to have a significant odor impact if it would affect a considerable number of off-site receptors.

Construction Emissions

Project construction would generate temporary air pollutant emissions. These impacts are associated with fugitive dust (PM_{10} and $PM_{2.5}$) from soil disturbance and exhaust emissions (NO_x and CO) from heavy construction vehicles. For the purpose of estimating emissions, daily emissions were quantified based on the use of standard construction equipment assuming that 0.5 acres would be disturbed daily, and a total of 11 worker and haul trips would occur daily. As noted, construction would generally consist of excavating a trench, removal of the existing pipeline, installation of the new pipeline, placement of backfill and asphalt concrete where needed to restore paved road surfaces. This scenario was modeled as the worst case and is intended to represent the construction for each project identified.

Site preparation and excavation would involve the greatest concentration of heavy equipment use and the highest potential for fugitive dust emissions. The project would be required to comply with SDAPCD Rules 52 and 54 which identify measures to reduce fugitive dust and is required to be implemented at all construction sites located within the SDAB. Therefore, the following conditions, which are required to reduce fugitive dust in compliance with SDAPCD Rules 52 and 54, were included in the California Emission Estimator Model (CalEEMod) version 2022.1 for site preparation and grading phases of construction.

1. **Minimization of Disturbance.** Construction contractors should minimize the area disturbed by clearing, grading, earth moving, or excavation operations to prevent excessive amounts of dust.

2. **Soil Treatment.** Construction contractors should treat all graded and excavated material, exposed soil areas and active portions of the construction site, including unpaved on-site roadways to minimize fugitive dust. Treatment shall include, but not necessarily be limited to, periodic watering, application of environmentally safe soil stabilization materials, and/or roll compaction as appropriate. Watering shall be done as often as necessary, and at least twice daily, preferably in the late morning and after work is done for the day.

3. **Soil Stabilization.** Construction contractors should monitor all graded and/or excavated inactive areas of the construction site at least weekly for dust stabilization. Soil stabilization methods, such as water and roll compaction, and environmentally safe dust control materials shall be applied to portions of the construction site that are inactive for over four days. If no further grading or excavation operations are planned for the area, the area shall be seeded and watered until landscape growth is evident, or periodically treated with environmentally safe dust suppressants, to prevent excessive fugitive dust.

4. **No Grading During High Winds.** Construction contractors should stop all clearing, grading, earth moving, and excavation operations during periods of high winds (20 miles per hour or greater, as measured continuously over a one-hour period).

5. **Street Sweeping.** Construction contractors should sweep all on-site driveways and adjacent streets and roads at least once per day, preferably at the end of the day, if visible soil material is carried over to adjacent streets and roads.

Construction is assumed to begin in summer 2026 and continue over a 6-8 month period. Estimated daily emissions are shown in Table 2 for a typical construction scenario. These are estimates based on an assumption that approximately 0.5 acres would be disturbed on any given day for demolition, site preparation, grading, HHD, trenching, backfilling and paving activities. Construction of the proposed project would not exceed the SDAPCD regional construction emission thresholds for daily emissions. The project would not generate trips at completion of each segment. Thus, the project construction would not conflict with the SIP, RAQS or AQMP, violate an air quality standard or contribute to an existing or projected violation, result in a cumulatively considerable increase in ozone or particulate matter emissions or expose receptors to substantial pollutant concentrations (thresholds b-c). This impact would be **less than significant**.

Table 2
Estimated Maximum Daily Construction Emissions

Construction1.1	Maximum Emissions (lbs/day)					
	ROG	NO_x	CO	SOx	PM_{10}	$PM_{2.5}$
2026 Maximum lbs/day	*1.1*	9.2	10.0	0.01	2.5	1.4
SDAPCD/County of San Diego Thresholds	*75*	*250*	*550*	*250*	*100*	55
Threshold Exceeded	**No**	**No**	**No**	**No**	**No**	**No**
2026 tons per year	0.2	1.7	1.8	0.002	0.5	0.3
SDAPCD/County of San Diego Thresholds	*15*	*40*	*100*	*40*	*15*	No standard
Threshold Exceeded	**No**	**No**	**No**	**No**	**No**	**No**

See Appendix for CalEEMod ver. 2022.1 computer model output. Summer emissions shown.

Operational Emissions

Upon completion, the new infrastructure would convey potable water as part of the existing delivery system. No operational emissions would be associated with the proposed project.

c) Sensitive receptors within the project area are primarily single-family residences. As shown in Table 2, project construction would not exceed SDAPCD pollutant thresholds. Further, project operation would not generate pollutants. The project would operate unsupervised and require periodic site visits for inspection and maintenance. This would not increase from what occurs under existing conditions.

Construction Related Toxic Air Contaminants. The greatest potential for toxic air contaminant emissions would be related to diesel particulate emissions associated with heavy equipment operations during construction of the proposed project. According to South Coast Air Quality

Management District (SCAQMD) methodology, health effects from carcinogenic air toxics are usually described in terms of "individual cancer risk". The California Office of Environmental Health Hazard Assessment (OEHHA) health risk guidance states that a residential receptor should be evaluated based on a 30-year exposure period. "Individual Cancer Risk" is the likelihood that a person exposed to concentrations of toxic air contaminants over a 70-year lifetime will contract cancer, based on the use of standard risk-assessment methodology. Given the short-term construction schedule and the fact that each project would be constructed at various locations throughout the VCMWD services area, the proposed project would not result in a long-term (i.e., 30 or 70 year) exposure to a substantial source of toxic air contaminant emissions; and thus, would not be exposed to the related individual cancer risk. Therefore, no significant short-term toxic air contaminant impacts would occur during construction of the proposed project.

d) The proposed project would generate odors from construction (i.e., diesel exhaust, asphalt). The project would not construct uses that generate odors. Construction odors would be temporary and would not exceed SDAPCD impact thresholds; thus, short-term odors are not expected to be significant. Impacts related to odors would be **less than significant.**

	Potentially Significant Impact	**Potentially Significant Unless Mitigation Incorporated**	**Less than Significant Impact**	**No Impact**
IV. <u>BIOLOGICAL RESOURCES</u> -- Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☐	☒

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
IV. <u>BIOLOGICAL RESOURCES</u> -- Would the project:				
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☒	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

Information provided herein was obtained from the *Biological Technical Report,* June 2025, prepared by Tierra Data, Inc., and provided herein as Appendix B.

a) Tierra Data Inc. (TDI) performed in-house GIS database searches for sensitive species detected in the immediate vicinity of the project area prior to conducting on-site field surveys. TDI accessed the California Natural Diversity Database (CNDDB) and the US Fish and Wildlife Service (USFWS) Carlsbad Field Office database for sensitive species in San Diego County to identify any species or species locations that could be directly or indirectly impacted by the

project. The California Native Plant Society (CNPS) shares their data with the CNDDB; thus, their latest information is included in the CNDDB.

The project alignment and a 300-foot buffer, were originally assessed by foot, where access allowed, on December 8, 2021. An update to the original fieldwork was performed on March 18, 2025, and again on May 2, 2025. The purpose of all site analyses and visits was to determine if any sensitive biological resources, including sensitive vegetation communities or species, and regulated wetlands, would be affected by the proposed project. The Project would need to be in compliance with the Federal Endangered Species Act (ESA), California Endangered Species Act (CESA), Clean Water Act (CWA), California Fish and Game (CFG) Code, and provide protection for birds under the Migratory Bird Treaty Act (MBTA) and CFG Code in satisfaction of State Water Resources Control Board (SWRCB) requirements. In addition, the Project may not violate the Restrictive Covenant.

The project site (alignment plus a 300' buffer) totals 49.71 acres and supports 16 vegetation communities/cover types. Habitat code designations for each vegetation community are defined consistent with Holland (1986) and/or Oberbauer et al. (2008). Mitigation ratios are those typically applied for projects under CEQA in San Diego County. These vegetation communities/cover types are shown in Table 3 below and depicted in Figure 3.

Observed Vegetation/Habitat Types

A list of the plant species observed within the study are presented in Appendix A of Appendix B. The native species present were generally common species associated with native and non-native habitats in the region. The project alignment is mostly within paved or unpaved roads with much of the adjacent land either developed (DEV), disturbed (DH) or regularly maintained as Non-native grassland (NNG) supporting mostly exotic (i.e., ornamental) species. Native habitat occurs along and away from the North Broadway corridor in the northern portion of the alignment. This includes Coastal Sage Scrub (CSS), Coastal Live Oak woodland (CLOW), and South Coast Live Oak Forest (SCLORF). Canopies of the trees in the CLOW and SCLORF hang over DH or NNG along the road edge. In the east, a large swath of mostly undeveloped NNG with immature Flat-topped buckwheat (FTB) patches occurs to the east of the corridor while west of alignment is developed with large lot rural residential homes.

Kellrae Lane west of North Broadway runs parallel to and north of the protected Restricted Covenant area. This area is dominated by CLOW with coast live oaks (*Quercus agrifolia*) and Mule Fat Scrub (MFS). Southern Arroyo willow Riparian Forest (SAWRF) along Reidy Creek is dominated by arroyo willows (*Salix lasiolepis*). The study area supports a variety of habitats, but no sensitive plant species were detected along or proximal to the alignment. All native habitats have been affected by weed incursion from nearby development or agriculture.

Table 3
Vegetation Communities/Cover Types

Vegetation Community/Cover Type	Abbreviation	Holland Code[1]	Mitigation Ratio	Acreage within		Total
				100' buffer	200-300' buffer	
Wetlands						
Southern Coast Live Oak Riparian Forest	SCLORF	61310	No net loss		0.57	0.57
Southern Arroyo Willow Riparian Forest	SAWRF	61320		1.07	2.47	3.54
Southern Arroyo Willow Riparian Forest - Disturbed	SAWRF-D	61320		0.01	0.34	0.35
Mule Fat Scrub	MFS	63310		0.17	1.10	1.27
Herbaceous Wetland	HW	63310		0.04	-	0.04
Disturbed Wetland	DW	11200		0.11	-	0.11
High Sensitivity Uplands						
Coast Live Oak Woodland	CLOW	71160	3:1	0.87	1.22	2.10
Moderate Sensitivity Uplands						
Coastal Sage Scrub	CSS	32500	2:1	0.30	1.44	1.73
Flat-topped Buckwheat	FTB	32800		0.13	-	0.13
Other						
Eucalyptus Woodland	EW	79100	None	0.58	0.12	0.70
Non-Native Grassland	NNG	42200		3.29	5.73	9.01
Non-native Vegetation	NNV	11100		0.21	0.25	0.46
Non-native Woodland	NNW	79000		1.16	0.19	0.35
Extensive Agriculture (Pasture)	EA	18300		0.64	2.25	2.89
Developed	DEV	12000		6.27	18.06	24.33
Disturbed Habitat	DH	11300		1.42	0.69	2.11
Total				15.28	34.43	49.71

1. Holland, R.F. 1986. Preliminary Descriptions of the Terrestrial Natural Communities of California. Oberbauer, T., M. Kelly, and J. Buegge. March 2008. Draft Vegetation Communities of San Diego County. Based on "Preliminary Descriptions of the Terrestrial Natural Communities of California," Robert F. Holland, Ph.D., October 1986.

Wildlife. Common wildlife species were observed during the site visits. A list of animals observed or noted on the site is provided in Appendix C of Appendix B. No sensitive wildlife species were detected. Some raptors were seen flying overhead or among trees including red-tailed hawk (*Buteo jamaicensis*), red-shouldered hawk (*Buteo lineatus*), and American kestrel (*Falco sparverius*).

Critical Habitat

No Designated Critical Habitat (DCH) occurs for any species within the study area. DCH for CAGN occurs half a mile to the west and northeast of North Broadway. No DCH for any other species occurs within 5 miles of the sites.

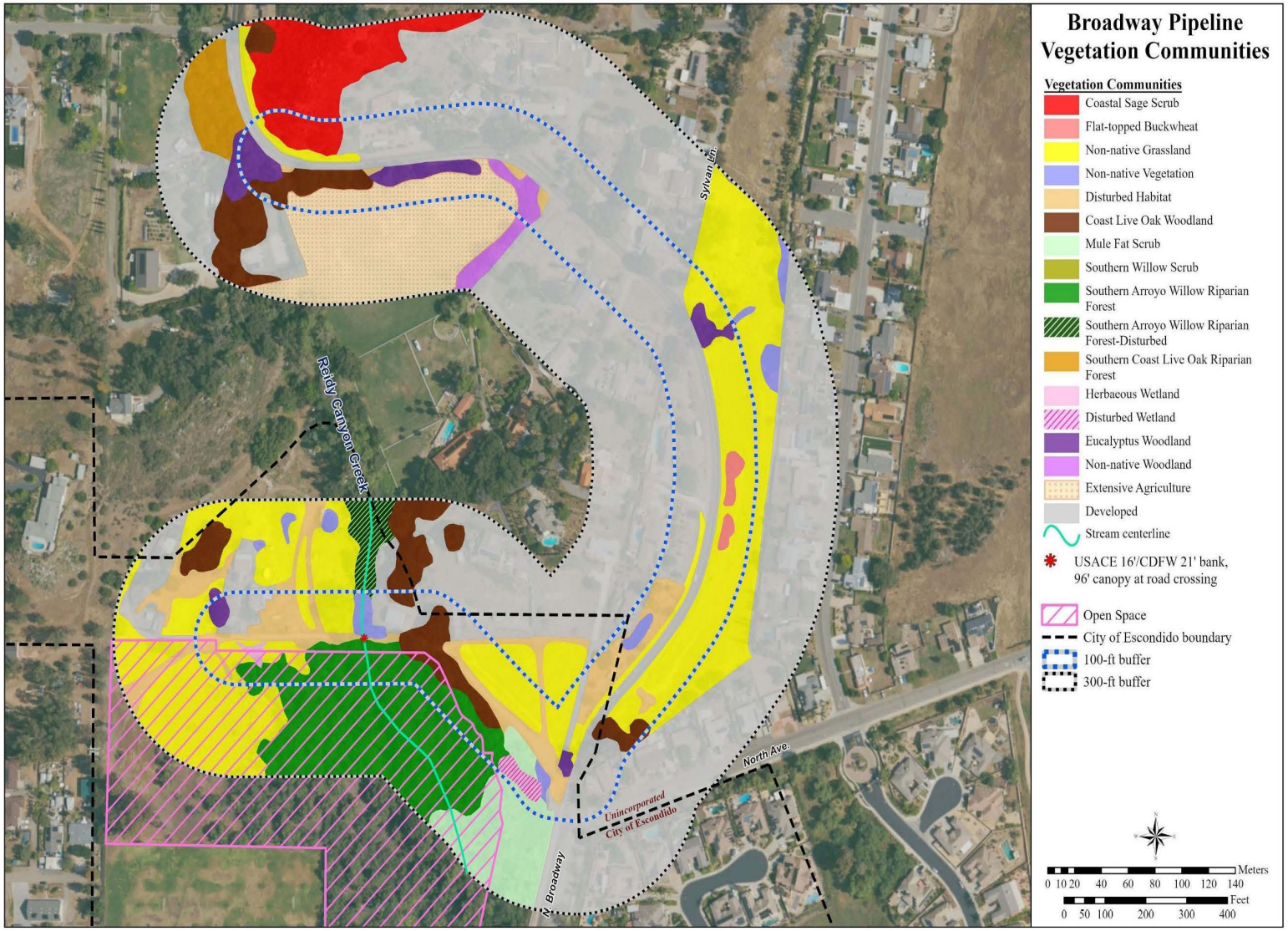


Figure 4—Vegetation Communities

Sensitive Species and Habitat
Most native habitats are considered sensitive and include SCLORF, SAWRF, MFS, HW, DW, CLOW, CSS, and FTB. While the CSS and SCLORF in the north is sensitive, the CLOW along North Broadway was planted along with other species along the edge of North Broadway around 1990. In the south, the natural habitats associated with Reidy Creek and in the Restrictive Covenant area are considered sensitive by USFWS and CDFW and include riparian woodlands (SAWRF and MFS) and CLOW which are mostly within the adjacent Restrictive Covenant area south of Kellrae Lane in the southwestern portion of the alignment.

TDI biologists did not observe any species of conservation concern during the survey; however, resource database searches indicate that the federally and state endangered Least Bell's Vireo (LBVI; *Vireo bellii pusillus*) has been detected one mile further south on Reidy Creek in riparian habitat adjacent to the Reidy Creek Golf Course. Habitat in the Restrictive Covenant area adjacent to the alignment may support LBVI. Habitat for CSS-dependent species including coastal California gnatcatcher (CAGN *Polioptila californica californica*) or Southern California Rufous-crowned Sparrow (RCSP; *Aimophila ruficeps canescens*) is present or proximal to the alignment in the north but the nearest documented CAGN or RCSP location is 1.5 miles to the west near Interstate 15.

Only two sensitive plant species, summer holly (*Comarostaphylis diversifolia* ssp. *diversifolia*; CRPR 1B.2) and Ramona horkelia (*Horkelia cuneata* var. *puberula*), have been detected in the vicinity of the proposed alignment but they are not proximal to it. Reidy Creek crosses the alignment under Kellrae Lane through a double box culvert. The creek bed is approximately three feet below the road surface with banks on either side and a riparian canopy overhead to the south. As stated, the creek is jurisdictional under the CWA to the USACE and Regional Water Quality Control Board (RWQCB) as well as under the California Fish and Game (CFG) code and the subject of the Restrictive Covenant.

Direct Environmental Impacts

Vegetation Communities. The alignment is in DEV (roads) along North Broadway or DH (unpaved road corridors) west of North Broadway. Impacts to these vegetation communities would not be a significant direct effect. However, sensitive habitats occur within or adjacent to the alignment and in the Restrictive Covenant which may be adversely affected by the project.

The oak trees located within the Restrictive Covenant area west of the alignment and along Kellrae Lane east of Reidy Creek north of the alignment become more dense and form a continuous canopy along the alignment for a distance of approximately 40 feet. A segment of the alignment is located north of Kellrae Lane to avoid an oak tree which is growing adjacent to the road. Construction in this area may require removal of lower branches to allow machinery access underneath. However, HHD along the north side may avoid potential impacts to tree roots that would otherwise occur if trenching were used in this area. Regardless, oak roots may be encountered if they extend under the HHD alignment and unpaved road east of the Restrictive Covenant. The trees could be adversely affected unless trimmed properly. See

Mitigation Measure BIO-1. With implementation of Mitigation Measure BIO-1, construction-related impacts to oak trees would be less than significant.

Sensitive Plants. No federal- or state-listed or ranked species were detected in or adjacent to the alignment, and none are expected to be affected.

Sensitive Animals. No federal-or state-listed species were detected along the alignment during general surveys though LBVI could use riparian habitat in the Restrictive Covenant area south and west of the alignment. Further, CSS occurs upslope of North Broadway in the north. The habitat in the Restrictive Covenant area adjacent to and south of Kellrae Lane is primarily comprised of low growing exotic vegetation between the oak and willow trees. LBVI require vertical structure to nest, typically within 3-6 feet of the ground; thus, the vegetation in this area is considered low quality for LBVI.

The CSS in the northern portion of the alignment is of good quality but away from the road beyond the NNG strip that is on top of the embankment that runs parallel to the road. No CAGN have been observed in the vicinity, the embankment is adjacent to the CSS and vehicles regularly pass by this area which likely dissuades occupation.

While the alignment is located adjacent to potentially suitable sensitive species habitat, there is a low potential for the species to occur (see Appendix D of Appendix B). However, project construction could cause or contribute to direct or indirect effects. Because the alignment and work area is a narrow linear corridor and adjacent habitat would allow affected species to move away from the construction area, indirect impacts would be transitory. While impacts would likely be less than significant, design considerations and avoidance measures are recommended herein to minimize potential impacts to sensitive animal species. With implementation of applicable measures identified in Mitigation Measure BIO-2, potential direct and indirect impacts to sensitive plant and animal species during construction would be less than significant.

Migratory Birds. The Migratory Bird Treaty Act (MBTA) of 1918 (16 USC 703-711) is an international treaty that makes it unlawful to take, possess, buy, sell, purchase, or barter any migratory bird listed in 50 CFR Part 10, including feathers or other parts, nests, eggs, or products, except as allowed by implementing regulations (50 CFR 21). Sections 3503, 3503.5, and 3800 of the California Department of Fish and Wildlife Code prohibit the take, possession, or destruction of birds, their nests, or eggs. The MBTA requires that project-related disturbance at active nesting territories be reduced or eliminated during critical phases of the nesting cycle (February 1 through August 31). Disturbance that causes nest abandonment and/or loss of reproductive effort (e.g., killing or abandonment of eggs or young) or loss of habitat upon which the birds depend could be considered “take” and constitute a violation of the MBTA.

Migratory birds include common, sensitive and listed species. As referenced, trees and shrubbery suitable for nesting by birds protected by the Migratory Bird Treaty Act are present on and adjacent to the project site. Because potential habitat is present within the proposed area

of potential effect and project construction may occur within the nesting cycle, potentially significant impacts to migratory bird species may occur. Implementation of Mitigation Measure BIO-3 would reduce potential impacts to migratory birds.

Indirect Effects

Indirect effects can occur to vegetation communities or their potential use by listed or sensitive species including raptors and nesting birds. Indirect effects include decreased surface water quality, construction noise, colonization of non-native plant species, and human and pet intrusion into habitat. While every effort will be made to limit indirect effects by restricting activity to developed or disturbed portions of the alignment to the maximum extent feasible, construction only occurring during daylight hours, and work will be managed by VCMWD, so potential indirect impacts from the Project are only expected to occur from other factors. The majority of the project noise will come from excavating and loading and unloading heavy equipment. Noise is typically only considered a problem when sound levels reach 60dBAleq (60dB averaged over an hour) for listed species.

While no federal or state-listed species were detected, LBVI could use habitat adjacent to the alignment proximal to the Restrictive Covenant area. Impacts will need to be avoided so surveys and/or consultation with the USFWS is not triggered. No indirect effects are expected to species listed under the federal and state ESAs. Indirect effects from noise on species with SSC status (coast horned lizard, Bell's sage sparrow, southern California rufous-crowned sparrow) would not be expected to substantially reduce the number or restrict the range of these species to a level affecting the species' population stability in the region. As a result, there would be no substantial effect on these species, and no mitigation is required.

The following mitigation measures will reduce or avoid potentially significant and/or adverse direct or indirect impacts to biological resources during construction of the proposed North Broadway Pipeline Relocation Project:

> **Mitigation Measure BIO-1:** If cutting branches or excavation under the canopy of an oak or other native tree is required, the District shall have a certified arborist monitor and advise on the best approach to working under the canopy or within the rootzones of such trees. If impacts cannot be avoided and a tree is severely damaged or removed, it must be replaced by saplings (10 gallons or larger) of the same species at a ratio of 5 saplings for every mature tree killed. In addition, there will be a 120-day tree establishment/maintenance period where VCMWD will care for the tree (water, fertilize, etc.) to maintain and establish its root system. Each sapling that perishes during that timeframe will be replaced in kind.
>
> **Mitigation Measure BIO-2**: Avoidance of impacts to sensitive areas and resources shall be achieved by implementing the following measures as applicable:
>
> - Environmentally Sensitive Area fencing shall be installed where these areas occur within or along work areas including the Restrictive Covenant. The

sensitive habitat within the Restrictive Covenant will be avoided by placing ESA fencing along the edge of the limits of work which will be at least 10 feet from the Restrictive Covenant on the south side of Kellrae Lane. This will keep vehicles and work from directly impacting the resources in the Restrictive Covenant. These areas shall be identified through implementation of preconstruction surveys by a qualified biologist;

- A qualified biologist shall conduct a training session for all project personnel prior to proposed activities. At a minimum, the training shall include a description of any species of concern and its habitats, the general provisions of the protective laws, the need to adhere to the provisions of the laws, the penalties associated with violating the provisions of the laws, the general measures being implemented to conserve sensitive species as they relate to the project, and the access routes to and from project site boundaries within which the project activities must be accomplished. The training session shall stipulate that project personnel stay out of the Restrictive Covenant area.

- A water pollution and erosion control plan shall be developed that describes sediment and hazardous materials control, dewatering or diversion structures, fueling and equipment management practices, and other factors deemed necessary by reviewing agencies. Erosion control measures shall be monitored on a regularly scheduled basis, particularly during times of heavy rainfall. Corrective measures will be implemented in the event erosion control strategies are inadequate. Sediment/erosion control measures will be continued at the project site until the restoration efforts are successful at soil stabilization;

- The footprint of disturbance shall be minimized to the maximum extent feasible. Access to sites shall be via pre-existing access routes to the greatest extent possible. There shall be no disturbance in the Restrictive Covenant area;

- Under no circumstances shall existing signage addressing the Restrictive Covenant be removed prior to or during construction;

- The upstream and downstream limits of project disturbance plus lateral limits of disturbance on either side of a stream shall be clearly defined and marked in the field and reviewed by the biologist prior to initiation of work. The same shall be performed for the Restrictive Covenant;

- Projects shall avoid the placement of equipment and personnel within a stream channel or on sand and gravel bars, banks; within the Restrictive Covenant and adjacent upland habitats used by sensitive species;

- Erodible fill material shall not be deposited into water courses. Brush, loose soils or other similar debris material shall not be stockpiled within the stream channel or on its banks;

- Equipment storage, fueling, and staging areas shall be located on upland sites with minimal risks of direct drainage into riparian areas or other sensitive habitats, including the Restrictive Covenant. These designated areas shall be located in such a manner as to prevent any runoff from entering sensitive habitat or the Restrictive Covenant. All necessary precautions shall be taken to prevent the release of cement or other toxic substances into surface waters and the Restrictive Covenant. All project related spills of hazardous materials shall be reported to appropriate entities including but not limited to applicable jurisdictional city, USFWS, CDFW, RWQCB, ACOE, the Escondido Union School District and shall be cleaned up immediately and contaminated soils removed to approved disposal areas.

- A qualified project biologist shall monitor construction activities throughout the duration of the projects to ensure that all practicable measures are being employed to avoid incidental disturbance of habitat and any sensitive species outside the project footprint, including monitoring along the Restrictive Covenant. The project biologist should be empowered to halt work activity if necessary and to confer with staff from the District to ensure the proper implementation of species and habitat protection measures;

- The removal of native vegetation shall be avoided and minimized to the maximum extent practicable. Temporary impacts shall be returned to pre-existing contours and revegetated with appropriate native species. All restoration plans shall be prepared and implemented consistent with appropriate Restoration/Revegetation Guidelines;

- Exotic species that prey upon or displace target species of concern shall be permanently removed from the site;

- To avoid attracting predators of sensitive species, the project sites shall be kept as clean of debris as possible. All food related trash items shall be enclosed in sealed containers and regularly removed from the site(s). Pets of project personnel shall not be allowed on-site where they may come into contact with any sensitive species;

- Construction employees shall strictly limit their activities, vehicles, equipment, and construction materials to the proposed project footprint and designated staging areas and routes of travel. The construction area(s) shall be the minimal area necessary to complete the project and shall be specified in the construction plans. Construction limits will be fenced with orange snow screen. Exclusion

fencing should be maintained until the completion of all construction activities. All employees shall be instructed that their activities are restricted to the construction areas;

- Any habitat destroyed that is not in the identified project footprint shall be compensated at a minimum ratio of 5:1. If the habitat is within the Restrictive Covenant, the ACOE, RWQCB, CDFW and the Escondido Union School District shall be alerted. Compensation, remediation and mitigation shall be directed by those agencies in consultation with the Escondido Union School District.
- If dead or injured listed species are located, initial notification must be made within three working days, in writing, to the USFWS Division of Law Enforcement in Torrance, California and by telephone and in writing to the applicable jurisdiction, Carlsbad Field Office of the USFWS, and CDFW;

- The USFWS, CDFW and ACOE shall have the right to access and inspect any sites of approved projects including any restoration/enhancement area for compliance with project approval conditions and mitigation measures;

- Any planting stock to be brought onto the site for landscaping or ecological restoration shall first be inspected by a qualified pest inspector to ensure it is free of pest species that could invade natural areas, including but not limited to Argentine ants, fire ants, and other insect pests. Any planting stock found to be infested with such pests shall not be allowed on the project site or within 300 feet of natural habitats. The stock shall be quarantined, treated, or disposed of according to best management principles by qualified experts in a manner that precludes invasions into natural habitats;

- All mitigation sites shall be conserved through fee title acquisition or conservation easement and shall be recorded shall be provided prior to land disturbance; and

- Any project landscaping shall not include species identified as an invasive non-native plant species as identified by the California Invasive Plant Council at http://www.cal-ipc.org/paf/.

Mitigation Measure BIO-3: Avoidance of direct impacts to native nesting birds is required by the MBTA and CFG code and would most easily be mitigated by working outside of the bird-breeding season. Raptors breed between January 15th and September 15th, though no raptor were identified during the surveys. Songbirds breed between March 1st and August 31st. If work must occur during the breeding season, the project area and buffer must be verified by a qualified biologist within three days before starting work to ensure no bird nests covered under the MBTA would be directly or indirectly impacted. If the project cannot be conducted without placing equipment or personnel in sensitive habitats and/or in proximity to active nests shall be scheduled to

avoid the breeding season of the affected avian species and/or sensitive species of concern as applicable.

Mitigation Measure BIO-4: If Least Bell's Vireo (LBVI) or California Coastal Gnatcatcher (CAGN) habitat could be affected during their breeding seasons (LBVI: March 15 to September 15; CAGN: February 15 to August 31) an evaluation shall be made by a qualified biologist to determine if the adjacent habitat is occupied by these species. LBVI has potential to occur in the Restrictive Covenant area and CAGN has the potential to be in the CSS to the north/northeast of the North Broadway corridor. If present, impacts to LBVI can be avoided by avoiding work next to the Restrictive Covenant area during the LBVI breeding season or by shielding work along the unpaved road from noise with temporary noise barriers, such that noise at any LBVI habitat is less than 60 dBA Leq. Alternatively, if surveys show that LBVI are absent, then work may proceed.

Specific implementation requirements for BIO-1, BIO-2, BIO-3 and BIO-4 as applicable will be provided in the Mitigation Monitoring and Reporting Program and in the Biological Resources Report (Appendix B). The responsibility for all mitigation measures, the Mitigation Monitoring and Reporting Program and any impacts, whether direct or indirect, is with VCMWD. This information is incorporated by reference herein and will be reviewed prior to construction to ensure applicable mitigation measures are implemented. With implementation of BIO-1, BIO-2, BIO-3 and BIO-4, direct impacts to sensitive plant and animal species would be avoided or reduced to **less than significant**.

b and c) A jurisdictional drainage crosses the proposed North Broadway alignment as an open channel with riparian resources along the banks. Reidy Creek is under the jurisdiction of the US Army Corps of Engineers (USCOE), California Department of Fish and Wildlife (CDFW) and San Diego Regional Water Quality Control Board. (RWQCB). The creek passes under Kellrae Lane through a double concrete 16-foot culvert that provides the approximately 10-feet of road width across the creek. The creek was estimated to have USCOE/RWQCB width of 16 feet, CDFW top-of-bank width of 23 feet and riparian canopy above the alignment extending 96 feet wide along the south bank. The north side is narrower at 16 feet and 21 feet respectively with no overhead riparian canopy as exotic trees occur on the north side of the culvert. Reidy Creek forms more than 2.5 miles to the north from the slopes of the northern end of Reidy Canyon but receives additional water from the agricultural operations on the valley floor to the north. As stated, Reidy Creek is a jurisdictional feature; however, the proposed pipeline would be installed approximately 20 feet under the creek using HHD methods. The boring and receiving pits would be constructed outside the riparian corridor adjacent to the creek. With appropriate ESA and silt fencing and monitoring along Reidy Creek (see Mitigation Measure BIO-1), there will be no drainage impacts to Reidy Creek or the culvert. No impacts to jurisdictional features would occur.

d) Wildlife movement corridors are areas that connect suitable wildlife habitat areas in a region otherwise fragmented by rugged terrain, changes in vegetation, or human disturbance. Natural

features such as canyon drainages, ridgelines, or areas with vegetative cover provide corridors for wildlife movement. Wildlife movement corridors are important because they provide access to mates, food, and water; allow the dispersal of individuals away from high population density areas; and facilitate the exchange of genetic traits between populations.

Corridors and Linkages in the project area are identified in the County of San Diego's (County's) North County Multiple Species Conservation Program Evaluation Model (County 2008). North Broadway is not within any identified linkage or corridor. The Restrictive Covenant areas which is located south of the alignment, may potentially provide some resources for local wildlife, however, it is fenced and not well connected in any direction. Reidy Creek winds through residential areas to the north and persist to the south as a local riparian corridor but is crossed by many streets and transitions to a concrete channel as it enters urban Escondido. The project would not impact any wildlife migratory corridors.

e-f) No Habitat Conservation Plans or Natural Community Conservation Plans are applicable to the project area. Potential impacts to trees and vegetation communities are describe above. Impacts can be avoided or reduced to less than significant with implementation of BIO-1 and BIO-2. N**o impact** per thresholds e-f would result from project implementation.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
V. <u>CULTURAL RESOURCES</u> -- would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	☐	☐	☐	☒
b) Cause a substantial adverse change in the significance of an archaeological resource as defined in §15064.5?	☐	☒	☐	☐
c) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☒	☐	☐

The following information is based in part on the results of a *Phase I Cultural Resource Assessment*, May 2025, prepared by South Environmental, LLC, and included herein as Appendix C.

a) The proposed pipeline alignment is located within an area dominated by large single-family lots, agricultural and equestrian operations and related uses associated with a rural residential environment as well as mature vegetation dominated by various native and ornamental species. There are no historic properties located within or adjacent to the existing or proposed pipeline easements. Therefore, n**o impact** to historic properties would occur as a result of project implementation.

b) The following identifies the Area of Potential Effects (APE), summarizes research findings, results of the pedestrian survey recommendations to address cultural resources located within or in proximity to the APE.

Area of Potential Effect
The project Area of Potential Effect (APE) encompasses approximately 1.8 acres northwest of North Broadway and North Avenue and within North Broadway. Within the APE are all areas where ground disturbance is expected to occur as a result of the proposed project, including staging and operation of construction vehicles and equipment, and soil disturbance (i.e., excavation, ground contouring, and backfill). The horizontal extent of the APE for the proposed project includes the entirety of the 1.8 acres. The vertical extent of the APE for the proposed project is defined as the maximum depth of soils disturbed during construction, and the maximum height of disturbance. The amount of disturbed soil varies according to the topography and construction needs but is anticipated to be a maximum depth of 5-10 feet below grade

Record Search Findings
A cultural resources records search of the APE and a one-mile search radius was conducted on March 6, 2025, at the South Coastal Information Center (SCIC), which houses cultural resources records for San Diego County. This search included their collections of mapped prehistoric and historic archaeological resources and historic built-environment resources, State of California Department of Parks and Recreation Series 523 forms (DPR forms), technical reports, archival resources, and ethnographic references. Additional consulted sources include historical maps of the study area, the NRHP, the CRHR, the lists of California State Historical Landmarks, California Points of Historical Interest, and the Archaeological Determinations of Eligibility list. The SCIC records search identified 30 cultural resource studies that were conducted within a one-mile radius of the APE, four of which included portions of the APE (SD-02727, -07799, -08588, and -08596), and one is adjacent (SD-19905). Reports SD-02727 and -07799 have not been digitized and copies were not available for review and summary. Reports SD-08588 and SD-08596 are discussed as follows:

SD-08588 (City of Escondido 1980)
The City of Escondido completed the "Draft Environmental Impact Report (EIR) for Expansion of Wastewater Treatment Facility" in 1980. This EIR included an archaeological survey that identified an archaeological site in the treatment plant site to be avoided by its expansion. Of note, however, this site is west of Interstate 15 and south of State Route 78, and outside the

current APE. The EIR's broad study area included the current APE but did not include archaeological survey within or near the APE.

SD-08596 (Keller Environmental Associates 1992)
Keller Environmental Associates, Inc., prepared "Appendices-Reclaimed Water Distribution System Project: Draft Environmental Impact Report" in 1992. These appendices include Brian F. Smith's 1992 "Results of a Cultural Resource Survey of the Escondido Reclaimed Water System." This study included limited archaeological survey, overlapping the southern edge of the Broadway APE and identified no resources within the current APE.

A total of 27 cultural resources are previously recorded within one mile of the APE. One of these resources is adjacent to the APE: P-37-001055, a prehistoric Native American site (see summary below). Of the 27 resources recorded within one mile of the APE, 22 are prehistoric or Native American in origin, three are historic built environment or historic archaeological resources, and two are multicomponent resources with both prehistoric and historic aspects.

P-37-001055
This prehistoric bedrock milling site with lithic scatter is located on a hill within fenced private property west of the North Broadway right-of-way and in between the east and west portions of the project APE. The site is described as possessing bedrock mortars, midden, and chipping waste.

Native American Scoping
A Native American Heritage Commission (NAHC) Sacred Lands File search was requested on February 28, 2025. The NAHC responded to the request on March 20, 2025, and reported positive results. On March 21, 2025, South Environmental sent letters to each contact provided by the NAHC. Three tribal contacts have responded to the outreach letters to date. The Pala Band of Mission Indians and the Rincon Band of Luiseño Indians both stated knowledge of known archaeological sites within the vicinity of the project APE and expressed concern of the impact on Tribal Cultural Resources.

Pedestrian Survey Results
On March 10, 2025, and May 2, 2025, an intensive pedestrian survey was conducted of the project APE. South Environmental Principal Archaeologist Kevin Hunt conducted an intensive-level survey of the project APE. Fieldwork included taking field notes and photographs. The APE was surveyed using transects spaced approximately five meters apart throughout the APE, except paved roadways where adjacent road shoulders were walked. Areas with exposed ground surface were examined for the presence of prehistoric artifacts (e.g., flaked stone tools, tool-making debris, stone milling tools), historical artifacts (e.g., metal, glass, ceramics), sediment discolorations that might indicate the presence of a cultural midden, depressions, and other features that might indicate the former presence of structures or buildings (e.g., post holes, foundations).

No archaeological resources were identified within the project APE. In the unpaved Kellrae Lane portion of the APE that runs east-west, ground visibility was approximately 50 percent

overall with excellent visibility along the road (Kellrae Lane), but very poor visibility off the road due to vegetation and leaf litter. Sediments within the Kellrae Lane portion of the APE consisted of compacted dirt with imported gravel. The area of the proposed laydown yard was covered with grass. Near the western end of the APE, Kellrae Lane crosses Reidy Creek with a concrete bridge. North Broadway is paved, obscuring ground visibility within the APE, and the shoulders were predominantly covered with gravel, plants, and leaf litter. The portions of the APE in the vicinity of previously recorded prehistoric site P-37-001055 (CA-SDI-1065) were inspected carefully with negative findings. As stated, the site is mapped within a fenced private property outside the APE.

Results and Recommendations
No archaeological, historic built environment, or tribal cultural resources were identified within the project APE as a result of the records search, Native American scoping, or intensive-level survey. Previously recorded prehistoric site P-37-001055 (CA-SDI-1065) is east of the proposed laydown yard and west of the North Broadway portion of the APE but within a fenced private property and has no potential to be affected by the proposed project.

Historic aerial photographs of the APE confirm that the upper levels of sediments within the APE were previously disturbed by agricultural uses and road development. While the APE is unlikely to contain intact buried archaeological deposits, it is always possible to encounter resources during project-related ground disturbance. Mitigation Measure CUL-1 is recommended to minimize potential impacts to unknown cultural resources during construction.

> **Mitigation Measure CUL-1**. VCMWD shall retain Luiseño Native American monitors during ground disturbing activities. If cultural resources are encountered during ground-disturbing activities, work in the immediate area must halt and an archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for archaeology (National Park Service 1983) must be contacted immediately, if not on-site, to evaluate the find. If the discovery proves to be significant under Section 106, additional work such as data recovery excavation may be warranted.

c) The potential for encountering human remains within the work area is low. No known burial sites have been identified on the site or in the vicinity. However, should human remains be encountered during project construction, implementation of recommendation CUL-2 would reduce potential impacts to **less than significant**.

> **Mitigation Measure CUL-2**. The discovery of human remains is always a possibility during ground disturbing activities. If human remains are found, the State of California Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the county coroner has made a determination of origin and disposition pursuant to Public Resources Code Section 5097.98. In the event of an unanticipated discovery of human remains, the county coroner shall be notified immediately. If the human remains are determined to be prehistoric, the coroner shall notify the Native American Heritage

Commission, which will determine and notify a Most Likely Descendant. The Most Likely Descendant shall complete the inspection of the site within 48 hours of notification and may recommend scientific removal and nondestructive analysis of human remains and items associated with Native American burials.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
VI. ENERGY – would the project:				
a) Result in potentially significant adverse impact due to wasteful, inefficient, consumption of energy resources during project construction or operation?	☐	☐	☒	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☐	☒

a) During construction, the Project would temporarily consume energy for the operation of construction equipment and vehicles. Standard methods of earth moving, excavations and repaving are planned. The proposed construction activities do not include methods of construction which would result in inefficient or unnecessary use of energy resources. Fuel demand is estimated based on the total Carbon Dioxide Equivalent (CO_2e) value calculated for each construction phase using the California Emission Estimator Model (CalEEMod) version 2022.1. Data are reported in annual metric tons of CO_2e for the duration of each construction phase. Metric tons are converted to kilogram CO_2e and then divided by a conversion factor used by the U.S. Environmental Protection Agency to estimate gallons of gasoline consumed based on carbon emissions. For the purpose of determining fuel demand, it was assumed that all worker vehicles would be use gasoline and all construction equipment would diesel-fueled. Based on estimated construction emissions, diesel demand would be 6,581 gallons and gasoline demand would be 270 gallons. The project would have negligible energy demand during operation. This would be focused on routine trips to inspect and maintain the project.

b) The project would make improvements to existing water supply infrastructure. As stated, construction would utilize heavy equipment that meets CARB requirements for energy efficiency and emission reduction. During operation, ongoing inspection and maintenance activities would occur; however, the project would not increase the number of maintenance inspection trips beyond existing conditions. As discussed in Section VIII, *Greenhouse Gas*, the

project would not conflict with a state or local plan regarding renewable energy or energy efficiency. **No impact** would under this threshold.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
VII. <u>GEOLOGY AND SOILS</u> – would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?	☐	☐	☒	☐
ii) Strong seismic ground shaking?	☐	☐	☒	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv) Landslides?	☐	☐	☒	☐
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c) Be located on a geologic unit or soil that is unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☒	☐
d) Be located on expansive soil, as defined in Table 1-B of the Uniform Building Code, creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not	☐	☐	☐	☒

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
VII. GEOLOGY AND SOILS – would the project:				
available for the disposal of wastewater?				
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☒	☐

a (i-ii) The nearest active fault is the Elsinore Fault Zone located north of the VCMWD service area. This fault is part of the San Andreas Fault system that extends approximately 650 miles from Baja California north terminating off the Pacific coast north of the San Francisco area (San Diego County General Plan Draft EIR, 2007). The project sites are not located within the boundaries of an Earthquake Fault Zone as defined by the Alquist-Priolo Earthquake Fault Zoning Act of 1972 (California Department of Conservation, website visited September 2019). There are no known active or potentially active faults traversing the project sites and the risk of ground rupture resulting from fault displacement beneath the site is low.

During the life of the proposed improvements, the project alignment will likely experience similar moderate to occasionally high ground shaking from known faults, as well as some background shaking from other seismically active areas of the Southern California region. However, the project would be designed and constructed to incorporate methods to address seismic concerns related to pipeline safety per the current California Building Code (CBC). Design and construction methods would address issues related to potential ground shaking. Impacts would be **less than significant.**

a (iii) Liquefaction typically occurs within the upper 50 feet of the surface, when saturated, loose, fine- to medium-grained soils (sand and silt) are present. Earthquake shaking suddenly increases pressure in the water that fills the pores between soil grains, causing the soil to lose strength and behave as a liquid. When liquefaction occurs, the strength of the soil decreases, reducing the ability of the underlying soil to support foundations for buildings and other structures. The type of geologic process that created a soil deposit has a strong influence on its liquefaction susceptibility. Saturated soils that have been created by sedimentation in rivers and lakes can be very susceptible to liquefaction.

Groundwater levels throughout the project area are unknown; however, they likely vary based on proximity to natural drainages. The work would occur in previously disturbed corridors and

easements. All pipes are located with 5-10 feet of the surface. While HHD would be used to install the pipeline segment north of Kellrae Lane, no deep excavation would be required; thus, the potential for encountering groundwater and related impacts associated with liquefaction at the subject site is considered low. The one exception may be in the Reidy Creek area where groundwater may be encountered. However, because HHD would be used in this location, disturbances would be outside the riparian corridor. Thus, encountering groundwater in quantities that could cause or contribute to liquefaction is remote. Impacts would be **less than significant.**

a (iv) The pipeline would be located in flat and rolling terrain. All work would occur in subsurface trenches which would then be restored to existing conditions at completion. Risks related to landslides would be no greater than under existing conditions. No pipeline improvements would be affected by landslides that may occur in the area. Impacts related to landslides would be **less than significant**.

b) As noted, the topography is primarily flat with adjacent rolling hills. While it is assumed that approximately one-half acre would be disturbed, trenching and pipeline installation activities may periodically disturb more than one acre; thus, it would be subject to State Water Resources Control Board General Construction Permit during construction to minimize soil erosion. For additional information, see Section IX, *Hydrology and Water Quality*. With implementation of Best Management Practices (BMPs) specified in the Stormwater Pollution Prevention Plan (SWPPP) prepared for the project, soil erosion hazard impacts would be **less than significant.**

c, d) Land subsidence is defined as the sinking or settling of land to a lower level. Causes can include: (1) earth movements; (2) lowering of ground water level; (3) removal of underlying supporting materials by mining or solution of solids, either artificially or from natural causes; (4) compaction caused by wetting (hydro-compaction); (5) oxidation of organic matter in soils; or (6) added load on the land surface. Subsidence is not common within the service area and has not contributed to the failure of existing pipelines. The actual load on underlying soils is minimal as the weight is distributed along the length of the pipeline rather than at specific points. Construction methods, including the subsurface treatment of the pipeline trench would minimize the potential for subsidence to occur. The potential for subsidence at the project sites are considered low. Therefore, impacts would be **less than significant.**

e) The proposed program would not generate wastewater. No connection to a sewer line or septic system would occur with the project. **No impact** would occur under this threshold.

f) Construction of the project would not impact, either directly or indirectly, any known unique paleontological resource or unique geologic features. Given the construction history and depth of previous disturbance in the construction area, the potential for locating undiscovered paleontological or geological resources is remote. However, with implementation of mitigation measure CUL-1, a **less than significant** impact to paleontological resources would occur.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
VIII. GREENHOUSE GAS EMISSIONS- Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b) Conflict with any applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

Gases that trap heat in the atmosphere are often referred to as greenhouse gases (GHGs), analogous to the way in which a greenhouse retains heat. Common GHG include water vapor, carbon dioxide (CO_2), methane (CH_4), nitrous oxides (N_2O_x), fluorinated gases, and ozone. GHGs are emitted by both natural processes and human activities. Of these gases, CO_2 and CH_4 are emitted in the greatest quantities from human activities. Emissions of CO_2 are largely by-products of fossil fuel combustion, whereas CH_4 results from off-gassing associated with agricultural practices and landfills. Man-made GHGs, many of which have greater heat-absorption potential than CO_2, include fluorinated gases, such as hydrofluorocarbons (HFCs), perfluorocarbons (PFC), and sulfur hexafluoride (SF_6). The accumulation of GHGs in the atmosphere regulates the earth's temperature. Without the natural heat trapping effect of GHGs, Earth's surface would be about 34° C (61° F) cooler. However, it is believed that emissions from human activities, particularly the consumption of fossil fuels for electricity production and transportation, have elevated the concentration of these gases in the atmosphere beyond the level of naturally occurring concentrations (Cal EPA, 2006).

Pursuant to the requirements of SB 97, the *CEQA Guidelines* were amended to include feasible mitigation of GHG emissions and analysis of the effects of GHG emissions. The adopted *CEQA Guidelines* provide regulatory guidance on the analysis and mitigation of GHG emissions in CEQA documents, while giving lead agencies the discretion to set quantitative or qualitative thresholds for the assessment and mitigation of GHGs and climate change impacts.

Individual projects do not generate sufficient GHG emissions to create a project-specific impact through a direct influence to climate change; therefore, the issue of climate change typically involves an analysis of whether a project's contribution towards an impact is cumulatively considerable. "Cumulatively considerable" means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, other current projects, and probable future projects (CEQA Guidelines, Section 15355).

Potential GHG impacts are evaluated per the County of San Diego recommended/preferred option threshold for all land use types of 900 metric tons CO_2E per year. GHG emissions associated with the project's construction period were estimated using the CalEEMod computer program. CalEEMod input parameters and output files are shown in Appendix A.

a) Construction activities would generate greenhouse gas (GHG) emissions associated with equipment operation. Construction of the proposed project is expected to generate approximately Daily construction emissions are estimated to generate a total of 72 metric tons of CO2E. The South Coast Air Quality Management District (SCAQMD) has recommended amortizing construction-related emissions over a 30-year period. Amortized over 30 years, the project would generate 2.4 metric tons of CO2E per year. Post-construction, the project would not generate any operational GHG emissions greater than what is generated by the existing operations.

Cumulatively, the estimated emissions would not exceed 900 MT CO2E annually; and thus, would not require mitigation measures to reduce emissions. GHG emissions would be **less than significant.**

b) The proposed program would replace existing pipeline segments and install a new segment within the VCMWD service area. As discussed, the project would not exceed the thresholds of significance established for the evaluation of individual projects for GHG emissions. With respect to consistency with plans or policies related to GHG emissions, the County of San Diego approved Climate Action Plan (September 2024) and the Valley Center Community Plan (amended 2014), there are no specific recommendations for reducing construction emissions from the use of equipment not in the County fleet. The only GHG emissions associated with the project are related to construction. As noted, the project would not generate post-construction GHG emissions. The project will not impede or delay local or statewide initiatives to reduce GHG emissions. Impacts would be **less than significant**.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
IX. <u>HAZARDS AND HAZARDOUS MATERIALS</u> - Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and	☐	☐	☒	☐

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
IX. <u>HAZARDS AND HAZARDOUS MATERIALS</u> - Would the project:				
accident conditions involving the release of hazardous materials into the environment?				
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within ¼ mile of an existing or proposed school	☐	☐	☒	☐
d) Be located on a site which is included on a list of hazardous material sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒
e) For a project 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, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	☐	☐	☐	☒

a-c) The proposed project would not require the use or storage of hazardous materials during construction or operation. The program would install a new segment of pipeline as described and replace an existing segment. As stated, a portion of the pipeline segment is located within

¼ mile of Reidy Elementary School. However, the project does not include manufacturing or other activities that would involve the routine use, handling, storage, or transport of hazardous materials in proximity to a school facility or other sensitive properties. **No impact** would occur.

d) Based on a review of available databases listing known hazard sites (Geotracker, Envirostor), there is no evidence of a hazardous environmental conditions in proximity to the project sites. **No impact** would occur.

e) Blackinton Airport, a private use airport, is located along Old Castle Road east of the Gordon Hill Road intersection approximately six miles northeast of the project area. Project improvements are all subsurface. No above-ground improvements would occur and none of the improvements are located within the Blackinton Airport land use boundary or within 2 miles of a public use airport in proximity to a private airstrip. **No impact** would occur.

f) The proposed project may require temporary lane closures during construction along or within roadway corridors; however, traffic control plans would be implemented as needed to ensure construction activities would not obstruct emergency vehicle access, evacuation routes or otherwise impair evacuation during emergencies. **No impact** would occur.

g) The project site is located in a Very High Fire Hazard Severity Zone as designated in maps prepared by the California Department of Forestry and Fire Protection (CalFire Fire Hazard Severity Viewer, accessed April 2025). All improvements would be subsurface; thus, the project does not involve development that would be at risk to wildfire. **No impact** would occur.

	Potentially Significant Impact	**Potentially Significant Unless Mitigation Incorporated**	**Less than Significant Impact**	**No Impact**
IX. <u>HYDROLOGY AND WATER QUALITY</u> – Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☐	☒
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that project may impede sustainable groundwater management of the basin?	☐	☐	☐	☒
c) Substantially alter the existing	☐	☐	☒	☐

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
IX. HYDROLOGY AND WATER QUALITY – Would the project:				
drainage pattern of the site or area, including through the alteration of the course of a stream or river, or through the addition of impervious surfaces, in a manner which would:				
(i) result in substantial erosion or siltation on- or off-site?				
(ii) substantially increase the rate or amount of surface water runoff which would result in flooding on- or off-site?	☐	☐	☐	☒
(iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☐	☒
(iv) Otherwise impede or redirect flood flows?	☐	☐	☐	☒
d) In flood hazard, tsunami or seiche risk release of pollutants due to project inundation?	☐	☐	☐	☒
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☐	☒

a, c) The project would improve water delivery system reliability. On-site drainage would be temporarily modified as the project is constructed. The projects will not create new impervious surfaces or otherwise modify existing drainage. Precipitation will continue to infiltrate through soil where improvements occur in unpaved areas.

The project would install a new pipeline segment and replace a segment of existing subsurface

pipelines along existing road corridors or within disturbed areas. As stated, the Reidy Creek crossing would be made using HHD to install the pipeline under the streambed adjacent to and north of the existing bridge. The project would not affect the stream or adjacent riparian corridor. The project would temporarily modify drainage within the immediate construction area where ground disturbance is occurring; however, it would not modify on-site drainage or alter the course of an existing stream or river. With implementation of the construction SWPPP and related BMPs to address erosion control, no on- or off-site erosion or siltation would occur. The scope of improvements would not cause flooding on- or off-site. The project would not substantially degrade water quality or otherwise violate discharge standards. **No impact** would occur under these thresholds.

b) The program would replace existing pipeline segments and related infrastructure to improve potable water delivery system reliability. The project would have no effect on groundwater, increase demand for groundwater or otherwise affect groundwater recharge. **No impact** would occur under this threshold.

d) The segment of pipeline crossing under Reidy Creek and within the area surrounding Paseo Del Norte is located in Flood Zone AE which identifies areas with a 1% change annual flooding. The remainder of the pipeline corridor is not located within a 100-year mapped flood zone as defined in the FEMA Flood Insurance Rate Maps that cover the Valley Center area. The project would not redirect on-site drainage patterns nor would it impede or redirect flood flows. As referenced, all runoff during construction would be managed consistent with the SWPPP and BMPs to avoid erosion and related sedimentation impacts to drainages adjacent to construction areas. The projects comprising the overall program would not expose people or structures to flood hazard from severe storm events. **No impact** would occur under this threshold.

The program would install a new pipeline segment and replace an existing pipeline segment as described. There are no surface reservoirs in proximity to the project areas that could cause inundation if a dam were to fail. Seiches are oscillations of the surface of inland bodies of water that vary in period from a few minutes to several hours. Seismic excitations can induce such oscillations. Tsunamis are large sea waves produced by submarine earthquakes or volcanic eruptions. The project is located well inland from the Pacific Ocean and is not subject to tsunami hazard. The nearest inland body of water is Lake Hodges located approximately seven miles southwest. Impacts from a seiche in Lake Hodges is not an issue of concern for the proposed project. The project site varies in topography; however, the proposed improvements would occur in a generally flat area and would not contribute to an increased risk for mudflow. **No impact** would occur under this threshold.

e) The proposed project would improve the reliability of the existing water delivery system. The project would not increase demand for potable water, impact water quality or groundwater recharge regulate per a water quality control plan or sustainable groundwater management plan. All project work would occur within the existing service area and/or pipeline corridors. **No impact** to water quality control plans or groundwater management plans would occur with construction and operation of the projects.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
XI. <u>LAND USE AND PLANNING</u> -- Would the proposal:				
a) Physically divide an established community?	☐	☐	☐	☒
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐	☒

a) The proposed project would install new pipeline segments and/or replace existing infrastructure. As referenced, all improvements would occur within existing alignments along road corridors and/or within new or existing easements. The proposed project would not result in the construction of improvements that would physically divide an existing community or otherwise impact circulation on public roads surrounding the site. N**o impact** would occur.
b) With implementation of mitigation measures to address potential impacts to Biological and Cultural Resources, the project would be consistent with state and federal regulatory programs in place to avoid or mitigate environmental impacts. The County of San Diego zoning code, General Plan and Valley Center Community Plan are not applicable to the scope of work required. There are no ornamental street trees located adjacent to the segments. As discussed in Section IV, *Biological Resources*, vegetation clearing would be limited to the southern end of the proposed corridor along the north side of the roadway east of Reidy Creek. No clearing or other direct impacts would occur to the Restrictive Covenant area. However, these are not considered land use impacts. **No impact** would occur under this threshold.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
XII. <u>MINERAL RESOURCES</u> -- Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
XII. MINERAL RESOURCES -- Would the project:				
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	☐	☐	☐	☒

a, b) The San Diego General Plan Draft EIR (2011) shows the project area is not within a mapped Mineral Resource Zone (MRZ). The nearest location where known mineral resources are present is the San Luis Rey River floodplain located north of the site. None of the proposed project sites are in the San Luis Rey River floodplain. The proposed project would not require excavation of mineral resources nor would construction result in the loss of availability of any known regional or local mineral resources. Therefore, **no impact** to mineral resources would occur.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
XIII. NOISE – Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
XIII. NOISE – Would the project result in:				
c) For a project located within the vicinity of a private airstrip or 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, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

Noise levels (or volume) are generally measured in decibels (dB) using the A-weighted sound pressure level (dBA). The A-weighting scale is an adjustment to the actual sound power levels consistent with the human hearing response, which is most sensitive to frequencies around 4,000 Hertz (about the highest note on a piano) and less sensitive to low frequencies (below 100 Hertz).

Sound pressure level is measured on a logarithmic scale with the 0 dB level based on the lowest detectable sound pressure level that people can perceive (an audible sound that is not zero sound pressure level). Based on the logarithmic scale, a doubling of sound energy is equivalent to an increase of 3 dB, and a sound that is 10 dB less than the ambient sound level has no effect on ambient noise. Because of the nature of the human ear, a sound must be about 10 dB greater than the reference sound to be judged as twice as loud. In general, a 3 dB change in community noise levels is noticeable, while 1-2 dB changes generally are not perceived. Quiet suburban areas typically have noise levels in the range of 40-50 dBA, while those along arterial streets are in the 50-60+ dBA range. Normal conversational levels are in the 60-65 dBA range, and ambient noise levels greater than 65 dBA can interrupt conversations.

In addition to the instantaneous measurement of sound levels, the duration of sound is important since sounds that occur over a long period of time are more likely to be an annoyance or cause direct physical damage or environmental stress. One of the most frequently used noise metrics that considers both duration and sound power level is the equivalent noise level (L_{eq}). The L_{eq} is defined as the single steady A-weighted level that is equivalent to the same amount of energy as that contained in the actual fluctuating levels over a period of time (essentially, the average noise level). Typically, L_{eq} is summed over a one-hour period.

The time period in which noise occurs is also important since noise that occurs at night tends to be more disturbing than that which occurs during the daytime. Two commonly used noise

metrics – the Day-Night average level (L_{dn}) and the Community Noise Equivalent Level (CNEL) recognize this fact by weighting hourly L_{eq} over a 24-hour period. The L_{dn} is a 24-hour average noise level that adds 10 dB to actual nighttime (10:00 PM to 7:00 AM) noise levels to account for the greater sensitivity to noise during that time period. The CNEL is identical to the L_{dn}, except it also adds a 5-dB penalty for noise occurring during the evening (7:00 PM to 10:00 PM).

Vibration is sound radiated through the ground. The rumbling sound caused by the vibration of room surfaces is called ground borne noise. Ground borne vibration is almost exclusively a concern inside buildings and is rarely perceived as a problem outdoors. Ground-borne vibration related to human annoyance is generally related to velocity levels expressed in vibration decibels (VdB). However, construction-related groundborne vibration in relation to its potential for building damage can also be measured in inches per second (in/sec) peak particle velocity (PPV) (Federal Transit Administration, May 2006). Based on the FTA's *Transit Noise and Vibration Impact Assessment* and the California Department of Transportation's 1992 *Transportation-Related Earthborne Vibration, Technical Advisory*, vibration levels decrease by 6 VdB with every doubling of distance.

Noise exposure goals for various types of land uses reflect the varying noise sensitivities associated with those uses. Residences, hospitals, schools, guest lodging, libraries, and parks are most sensitive to noise intrusion; and therefore, have more stringent noise exposure standards than commercial or industrial uses that are not subject to impacts such as sleep disturbance. Sensitive land uses generally should not be subjected to noise levels that would be considered intrusive in character. Therefore, the location, hours of operation, type of use, and extent of development warrant close analysis in an effort to ensure that noise sensitive receptors are not substantially affected by noise.

Noise Standards

Federal Noise Policies. There are no federal noise requirements or regulations that apply directly to the project area. However, there are federal regulations that influence the audible landscape, especially for projects where federal funding is involved. For example, the FHWA requires abatement of highway traffic noise for highway projects through rules in the Code of Federal Regulations (23 CFR Part 772), the Federal Transit Administration (FTA), and Federal Railroad Administration (FRA). Each agency recommends thorough noise and vibration assessments through comprehensive guidelines for any highway, mass transit, or high-speed railroad projects that would pass by residential areas.

The U.S. Fish and Wildlife Service requires that noise be limited to a level not to exceed an hourly limit of 60 dBA Leq or the average ambient noise, whichever is greater, at the edge of the habitat during the breeding season (i.e., February 1 through September 15) for each sensitive species potentially affected by construction and operation of a proposed project.

Federal Vibration Policies. The Federal Transit Administration (FTA) has published guidelines for assessing the impacts of groundborne vibration associated with construction activities,

which have been applied by other jurisdictions to other types of projects. The FTA measure of the threshold of architectural damage for non-engineered timber and mason buildings (e.g., residential units) is 0.2 in/sec PPV. The threshold of perception of vibration is 0.01 in/sec PPV (Federal Transit Administration, Office of Planning and the Environment, 2006).

State Noise Policies. Title 24, Section 3501 et. seq. of the California Code of Regulations codifies California Noise Insulation Standards. This code section uses the Community Noise Equivalency Level (CNEL) as its primary noise evaluation measurement. The CNEL measurement assesses noise variation during different times of the day for the purposes of averaging noise over a 24-hour period. Essentially, CNEL takes average sound levels at an observation point and adds a weighted penalty to those sounds that occur during the evening (+5 dBA) and nighttime hours (+10 dBA). An interior noise level of 45 dBA CNEL is often considered the desirable noise exposure level for single-family residential units. An exterior noise level of 65 dBA is generally considered an acceptable level for residential and other noise-sensitive land uses.

State Vibration Policies. Vibration is a unique form of noise as the energy is transmitted through buildings, structures and the ground whereas audible noise energy is transmitted through the air. Thus, vibration is generally felt rather than heard. The ground motion caused by vibration is measured as peak particle velocity (PPV) in inches per second. Vibration impacts to buildings are generally discussed in terms of PPV which describes particle movement over time (in terms of physical displacement of mass). Vibration can impact people, structures, and sensitive equipment Groundborne vibration generated by construction projects is usually highest during pile driving, rock blasting, soil compacting, jack hammering, and other high impact demolition and excavation-related activities. Grading also has the potential to cause short-term vibration impacts if large bulldozers, loaded trucks, or other heavy equipment operate within proximity to sensitive land uses. Use of the PPV descriptor is common when addressing potential impacts to structures. There are no state standards for traffic-related vibrations. Per Caltrans standards, excessive ground-borne vibration would occur if construction-related ground-borne vibration exceeds the "severe" vibration annoyance potential criteria for human receptors of 0.4 inch per second PPV or the damage potential criteria to older residential structures of 0.3 inch per second PPV for continuous/frequent intermittent construction sources.

San Diego County Noise Policies. The San Diego County Regulatory Ordinances Section 36.404 limits noise levels in residential areas of the County to 50 dBA Leq (hourly average) from 7:00 a.m. to 10:00 p.m. and 45 dBA Leq from 10:00 a.m. to 7:00 a.m. Section 36.408 limits the use of construction equipment between the hours of 7:00 a.m. and 7:00 p.m. Monday through Saturday. No commercial construction is allowed on Sundays or holidays. Per Section 36.409, except for emergency work, construction equipment operation must not exceed an average sound level of 75 decibels for an eight-hour period, between 7 a.m. and 7 p.m., when measured at the boundary line of the property where the noise source is located or on any occupied property where the noise is being received.

a) **Construction Noise**. Temporary, construction-related noise would occur during construction

of the proposed project. The noise levels associated with the operation of common construction equipment are shown in Table 4. The noise levels are provided for reference purposes; not all equipment shown would be used for the proposed project. Noise levels are expected to occur within the ranges shown.

Construction of the proposed project may utilize, dozers, tractors, loaders, trucks and a variety of other types of equipment during various phases of the construction process. Noise levels associated with the equipment commonly used will range from 78 to 84 dBA at 50 feet from the source for the work performed. A doubling of sound energy yields an increase of three decibels, so multiple pieces of equipment operating together may cause relatively small but noticeable increases in noise levels above that associated with one piece of equipment. Assuming two pieces of construction equipment, a backhoe and bobcat tractor, are operating at the same time, the worst-case combined noise level during the site preparation phase of construction is an estimated 85 dBA at a distance of 50 feet from the active construction area.

Table 4
Typical Maximum Construction Equipment Noise Levels

Equipment Onsite	Typical Maximum Level (dBA) 50 Feet from the Source	Typical Maximum Level (dBA) 100 Feet from the Source	Usage Factor
Air Compressor	78	72	40%
Backhoe	78	72	40%
Bobcat Tractor	84	78	40%
Concrete Mixer	79	73	40%
Loader	79	73	40%
Bulldozer	82	76	40%
Jack Hammer	89	83	20%
Pavement Roller	80	74	20%
Street Sweeper	82	76	10%
Man Lift	75	69	20%
Dump Truck	77	71	40%
Mobile Crane	81	75	16%
Excavator/Scraper	84	78	40%

Source: FTA Noise and Vibration Impact Assessment Manual (September 2018), Table 7-1.
Noise levels are based on actual maximum measured noise levels at 50 feet (Lmax).
Noise levels are based on a noise attenuation associated with the usage factor.

The nearest sensitive properties are single family residences located at varying distances from the construction areas. The nearest properties are approximately 60 feet from the construction corridor. The only noise associated with the project would occur during construction which will be periodically audible at neighboring residences. As referenced, the worst-case combined noise level during the site preparation phase of construction is an estimated 89 dBA at a

distance of 50 feet from the active construction area assuming use of jackhammer. Equipment more commonly used, including a dump truck and back-hoe, generate noise levels in the range of 77-78 dBA at 50 feet.

Construction noise is highly variable as the type of activity and equipment used varies throughout the day. Further, construction is mobile and typically occurs during an 8-hour workday within the 7:00 a.m. to 7:00 p.m. construction window. While noise levels could periodically exceed 75 dBA at 50 feet from the work area, the noise is temporary and would not exceed 75 dBA at any one location over a 12-hour, 7:00 a.m. to 7:00 p.m. work period.

With respect to indirect noise impacts to sensitive species, the majority of the project noise will come from clearing, excavating, and loading with heavy equipment, Noise is typically only considered a problem when sound levels reach 60 dBA Leq (60 dBA averaged over an hour) for listed species during the breeding season. No federal- or state-listed species were detected and none are expected to occur within the alignments or in habitat adjacent to the alignments; thus, no indirect effects are expected to species listed under the federal and state Endangered Species Act. Mitigation Measures BIO-3 and BIO-4 address potential impacts to migratory bird species and the two above-referenced listed species. Indirect effects from noise on species with SSC status (LBVI and CAGN) is not expected to substantially reduce the number, or restrict the range, of these species to a level affecting the species' population stability in the region.

The proposed project would comply with the limitation on hours of construction activity; thus, noise impacts to adjacent residences and sensitive species during the construction phase would be **less than significant**. No mitigation is required.

The proposed project would not generate noise post-construction. Routine maintenance inspections may be necessary; however, that would be consistent with current maintenance activities that occur throughout the VCMWD service area. They would not generate noise in excess of County standards. Impacts would be **less than significant.**

b) The vibration velocity level for perception by humans is approximately 65 VdB. A vibration velocity of 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible levels. The California Department of Transportation uses the following standards when addressing vibration. Excessive ground-borne vibration would occur if construction-related ground-borne vibration exceeds the "severe" vibration annoyance potential criteria for human receptors of 0.4 inch per second PPV or the damage potential criteria to older residential structures of 0.3 inch per second PPV for continuous/frequent intermittent construction sources, as specified by Caltrans (April 2020) The PPV and accompanying VdB level associated with common construction equipment is shown in Table 5. Based on the type of construction work, heavy impact construction methods that could generate enough vibration to damage buildings proximal to the project site (i.e., pile driving, rock breaking, drilling, blasting) would not be required for the project.

Table 5
Vibration Source Levels for Construction Equipment

	Peak Particle Velocity (inches/second) at 25 feet	Approximate Vibration Level LV (dVB) at 25 feet
Pile driver (impact)	1.518 (upper range)	112
	0.644 (typical)	104
Pile driver (sonic)	0.734 upper range	105
	0.170 typical	93
Clam shovel drop (slurry wall)	0.202	94
Hydromill (slurry wall - soil)	0.008 in soil	66
Hydromill (slurry wall - rock	0.017 in rock	75
Vibratory Roller	0.21	94
Hoe Ram	0.089	87
Large bulldozer	0.089	87
Caisson drill	0.089	87
Loaded trucks	0.076	86
Jackhammer	0.035	79
Small bulldozer	0.003	58
Source: Transit Noise and Vibration Impact Assessment, Federal Transit Administration, September 2018.		

Construction activity on the project site would be temporary and vibration events would be transitory occuring only during equipment pass bys. Using vibration levels associated with a loaded truck, the piece of equipment used during grading and with the highest vibration level likley to be used on-site, as a worst case scenario, groundborne vibration would be approximately 0.076 PPV at 25 feet (see Table 5 above). The PPV generated by a large truck at 25 feet would be below the vibration thresholds of significance referenced above. As stated, the closest sensitive properties are approximately 60 feet from the property line so project generated construction related vibrations would be below those reported in Table 4.

Construction would occur consistent with Section 36.408 of the County of San Diego code which limits the use of construction equipment between the hours of 7:00 a.m. and 7:00 p.m. Monday through Saturday. No construction would occur on Sundays or holidays. Further, sustained equipment operation is not expected to occur proximal to adjacent properties nor would the PPV reach 0.3 PPV, the level that could damage older residential structures as determined by Caltrans (April 2020). Thus, project impacts related to construction vibration would be less than significant.

c) The existing noise environment in the project area consists primarily of noise associated with rural residential areas, traffic on neighboring roadways, aircraft overflights, landscaping equipment, barking dogs and noise from similar sources. The proposed project would not generate new traffic or require the use of noise-generating equipment. With the completion of construction activities, ambient noise levels would not change as a result of project operation. The project area is located in general proximity to Blackinton Airport; however, all improvements would occur outside the boundaries of any airport land use plan and none would be sensitive to aircraft noise. **No impact** would occur under this threshold.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
XIV. <u>POPULATION AND HOUSING</u> — Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☐	☒
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

a) The proposed project consists of installing a new pipeline segment in the Reidy Creek area east to North Broadway and then north to Sylvan Lane. An existing pipeline would be replaced from Sylvan Lane northwest to approximately 300 feet south of Paseo Del Norte. While a new segment would be added, it would not serve a currently unserved area. The project would not induce population growth directly through the development of new residential occupancies or indirectly through the extension of utility infrastructure to a currently unserved area. **No impacts** related to population growth would occur with the project.

b) The project site consists of existing roadway corridors and easements. Project implementation would not result in the removal of existing housing or the displacement of residents that would require the construction of replacement housing elsewhere. **No impact** would occur**.**

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
XV. <u>PUBLIC SERVICES</u>				
a) Would the project result in substantial adverse physical impacts associated with the provision of new or				

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
XV. PUBLIC SERVICES				
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 public services:				
i) Fire protection?	☐	☐	☐	☒
ii) Police protection?	☐	☐	☐	☒
iii) Schools?	☐	☐	☐	☒
iv) Parks?	☐	☐	☐	☒
v) Other public facilities?	☐	☐	☐	☒

a (i-v) The project would not induce population growth directly through the development of new residential occupancies or indirectly through the extension of utility infrastructure to a currently unserved area. Demand for public services within Valley Center would not change as a result of project construction and operation. Thus, the project would not require the provision of new or physically altered governmental facilities to maintain acceptable levels of service. **No impact** would occur.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
XVI. RECREATION --				
a) Would the project increase 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?	☐	☐	☐	☒

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
XVI. RECREATION --				
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☒

a-b) The project would not increase demand for recreational facilities such that the deterioration of such facilities would be accelerated. Further, the project would not require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment. **No impact** would occur.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
XVII. TRANSPORTATION -- Would the project:				
a) Conflict with a program, plan, ordinance or policy addressing the circulation system including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☐	☒
b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☐	☐	☒
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment)?	☐	☐	☐	☒
d) Result in inadequate emergency access?	☐	☐	☐	☒

a-b) Project construction would temporarily increase traffic on area roadways as equipment and materials are delivered to the construction site and staging areas. This is not expected to affect roadway operations. The new pipeline segments would be monitored and/or inspected consistent with current operations. No bicycle, pedestrian or transit services would be permanently affected. No additional trips would be required to operate and maintain project improvements; thus, the vehicle miles traveled (VMT) associated with ongoing inspection and maintenance would not change from existing conditions. **No impact** would occur under this threshold.

c) The proposed project would not require any road improvements. Disturbed road corridors would be restored to preconstruction condition. Thus, it would not result in design features that would increase hazards. **No impact** would occur.

d) The proposed project would not alter emergency access routes. No road improvements or revisions to the existing circulation pattern would occur as a result of the project. No project activity would impair emergency access to the area. **No impact** would occur.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
XVIII. TRIBAL CULTURAL RESOURCES -- Would the project:				
a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in the Public Resource Code section 21074 as either a site, feature, place cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place or object with cultural value to a California Native American tribe, and that is:				
i. Listed or eligible for listing in the California Register of Historic Places, or in a local register of historical resources as defined in Public Resource Code section 5020.1(k), or	☐	☐	☒	☐

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
XVIII. TRIBAL CULTURAL RESOURCES -- Would the project:				
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resource Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐

a)) As stated above in Section IV, Cultural Resources, no archaeological, historic built environment, or tribal cultural resources were identified within the project APE as a result of the records search, Native American scoping, or intensive-level survey. Previously recorded prehistoric site P-37-001055 (CA-SDI-1065) is east of the proposed laydown yard and west of the North Broadway portion of the APE but within a fenced private property and has no potential to be affected by the proposed project. Thus, no resources listed or eligible for listing in the California Register of Historic Places, or in a local register of historical resources as defined in Public Resource Code section 5020.1(k) would be affected by the proposed Project.

b) VCMWD sent consultation letters to 32 tribal contacts on October 29, 2025, with follow up e-mails sent to all contacts that had not replied or had not reviewed the e-mail notice. Two tribes responded requesting consultation. Both the Rincon Band of Luiseño Indians and the Viejas Band of Kumeyaay Indians requested consultation and monitoring during construction.

The *Phase I Cultural Resources Assessment* referenced above, did not identify significant resources within the APE pursuant to criteria set forth in subdivision (c) of Public Resource Code Section 5024.1. However, as an outcome of the consultation process, the District will retain Luiseño Native American monitors during ground disturbing activities consistent with Mitigation Measures TCR-1 through TCR-9. Impacts under this threshold would be **less than significant.**

MM TCR-1 Prior to the issuance of a Grading Permit, the Applicant/Owner shall enter into a Tribal Monitoring Agreement with the Rincon Band of Luiseño Indians. A copy of the agreement shall be included in the Grading Plan Submittals for the Grading Permit.

MM TCR-2 Prior to the issuance of a Grading Permit, the Applicant/Owner or Grading Contractor shall provide a written and signed letter to the VCMWD stating that a Qualified Archaeologist and Native American Monitor affiliated with the Rincon Band of Luiseño Indians have been retained at the Applicant/Owner or Grading Contractor's expense to implement the monitoring program, as described in the pre-excavation agreement.

MM TCR-3 The Qualified Archaeologist shall maintain ongoing collaborative consultation with the Luiseño Native American Monitor during all ground disturbing activities. The requirement for the monitoring program shall be noted on all applicable construction documents, including demolition plans, grading plans, etc. The Applicant/Owner or Grading Contractor shall notify the VCMWD of the start and end of all ground disturbing activities.

MM TCR-4 The Qualified Archaeologist and Rincon Band representative shall attend all applicable pre-construction meetings with the General Contractor and/or associated Subcontractors to present the archaeological monitoring program. The Qualified Archaeologist and Luiseño Native American monitor shall be present on-site full-time during grubbing, grading and/or other ground altering activities, including the placement of imported fill materials or fill used from other areas of the project site, to identify any evidence of potential archaeological or Tribal Cultural Resources. All fill materials shall be absent of any and all Tribal Cultural Resources.

MM TCR-6 The Qualified Archaeologist or the Luiseño Native American Monitor may halt ground disturbing activities if unknown Tribal Cultural Resources, archaeological artifact deposits or cultural features are discovered. Ground disturbing activities shall be directed away from these deposits to allow a determination of potential importance. No photography, invasive or non-invasive testing is permitted without prior approval by the Rincon Band of Luiseño Indians. Isolates and other deposits will be minimally documented in the field, and before grading proceeds these items shall be secured at a secured and locked location on project site and as agreed upon by the Rincon Band of Luiseño Indians until they can be repatriated for later reburial on site. If items cannot be securely stored on the project site, they may be stored in off-site facilities located in San Diego County and agreed upon by the Rincon Band of Luiseño Indians. If the Qualified Archaeologist and Luiseño Native American monitor determine that the unearthed tribal cultural resource, artifact deposits or cultural features are considered potentially significant, or including ancestral remains are identified, TCA Luiseño Tribes that have participated in the state-prescribed consultation process for this project shall be notified and consulted regarding the respectful and dignified treatment of those resources. The avoidance and protection of the significant tribal cultural resource and/or unique

archaeological resource is the preferable mitigation. If, however, it is determined by the VCMWD that avoidance of the resource is infeasible, the VCMWD shall notify the Rincon Band of Luiseño Indians and other TCA Luiseño Tribes that have participated in the state-prescribed consultation process for this project and consult regarding appropriate next steps. If the decision is made that data recovery is needed, the VCMWD shall consult with the Rincon Band of Luiseño Indians on the drafting and finalization of any such recovery plan. The data recovery plan shall also incorporate and reflect the tribal values of the TCA Luiseño Tribes that have participated in the state-prescribed consultation process for this project. If the Qualified Archaeologist collects such resources, the Luiseño Native American monitor must be present during any cataloging of those resources. Moreover, if the Qualified Archaeologist does not collect the Tribal Cultural Resources that are unearthed during the ground disturbing activities, the Luiseño Native American monitor, may at their discretion, collect said resources and provide them to the Rincon Band of Luiseño Indians, as determined through the appropriate process, for respectful and dignified treatment in accordance with the Tribe's cultural and spiritual traditions. Ground disturbing activities shall not resume until the Qualified Archaeologist, in consultation with the representative of the Rincon Band of Luiseño Indians, deems the cultural resource or feature has been appropriately documented and/or protected.

MM TCR-7 Any artifacts identified and collected during construction grading activities are not to leave the project area and shall remain onsite in a secure location until final disposition. Historic Resources All historic archaeological materials recovered are to be curated at the San Diego Archaeological Center or other facility in San Diego County that meets State Resources Department Office of Historic Preservation Guidelines for the Curation of Archaeological Resources. Evidence shall be in the form of a letter from the curation facility identifying that archaeological materials have been received and that all fees have been paid.

Precontact and/or Tribal Cultural Resources

One of the following treatments shall be applied.

1. Preservation–in-place, if feasible is the preferred option. Preservation in place means avoiding the resources, leaving them in the place where they were found with no development affecting the integrity of the resources.

2. Reburial of the resources on the Project property. The measures for reburial shall be culturally appropriate as determined through consultation with the Rincon Band of Luiseño Indians and include, at least, the following: Measures to protect the reburial area from any future impacts in perpetuity. Reburial shall not occur until all required cataloguing by the archaeologist in presence of the Rincon Tribal Monitor has been completed on the cultural resources, with the exception that sacred and ceremonial items, burial goods, and Native American

human remains are excluded. No cataloguing, analysis, or other studies may occur on human remains grave goods, and sacred and ceremonial items. Any reburial processes shall be culturally appropriate and approved by the Rincon Band of Luiseño Indians. Listing of contents and location of the reburial shall be included in the confidential Phase IV Report. The Phase IV Report shall be filed with the County under a confidential cover and not subject to a Public Records Request. A copy is to be provided to the Rincon Band of Luiseño Indians. A reburial area must be protected in perpetuity via deed restriction or other land covenant.

MM TCR-8 Prior to the release of the grading bond, a monitoring report and/or evaluation report, if appropriate, which describes the results, analysis and conclusions of the archaeological monitoring program (e.g., data recovery plan) shall be submitted by the Qualified Archaeologist, along with the Luiseño Native American monitor's notes and comments, to the VCMWD for approval.

MM TCR-9 As specified by California Health and Safety Code Section 7050.5, if human remains are found on the project site during construction or during archaeological work, the person responsible for the excavation, or his or her authorized representative, shall immediately notify the San Diego County Office of the Medical Examiner by telephone. No further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains shall occur until the Medical Examiner has made the necessary findings as to origin and disposition pursuant to Public Resources Code 5097.98. If such a discovery occurs, a temporary construction exclusion zone shall be established surrounding the area of the discovery so that the area would be protected, and consultation and treatment could occur as prescribed by law. If suspected Native American remains are discovered, the remains shall be kept in-situ, or in a secure location in close proximity to where they were found, and the analysis of the remains shall only occur on-site in the presence of a representative of the Rincon Band of Luiseño Indians. By law, the Medical Examiner will determine within two working days of being notified if the remains are subject to his or her authority. If the Medical Examiner identifies the remains to be of Native American ancestry, he or she shall contact the Native American Heritage Commission (NAHC) within 24 hours. The NAHC shall make a determination as to the Most Likely Descendant.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
XIX. <u>UTILITIES AND SERVICE SYSTEMS</u> -- Would the project:				
a) Require or result in the relocation or	☐	☐	☐	☒

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
XIX. <u>UTILITIES AND SERVICE SYSTEMS</u> -- Would the project:				
construction of new or expanded water, or wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities or expansion of existing facilities, the construction or relocation of which could cause significant environmental effects?				
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☐	☒
c) 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?	☐	☐	☐	☒
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☐	☒

a) The proposed project would install approximately 2,140 linear feet of new pipeline and replace approximately 1,100 linear feet of existing pipeline. The project would upgrade the existing infrastructure. As stated, with mitigation to address potential impacts to biological and cultural resources during construction, no adverse impacts would occur.

The project would install a new water infrastructure. It would result in the relocation or construction of new or expanded water, or wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities or expansion of existing facilities. All impacts would be temporary occurring only during construction. **No impact** would occur under this threshold.

b) The project would install a new pipeline and replace an existing water pipeline segment. The improvements are not being proposed to address deficiencies in supply nor would the improvements increase water demand. **No impact** would occur under this threshold.

c) The project would not generate or discharge wastewater. Thus, the project would not create additional demand on existing facilities such that wastewater treatment standards would be exceeded or new or expanded facilities required. **No impact** would occur.

d) The proposed project would generate construction/demolition waste (CDW). No waste would be generated post-construction. It is presumed that construction waste would be comprised of concrete, metals, wood, landscape and related material. The California Integrated Waste Management Act (CIWMA) of 1989 mandates that all cities and counties in California reduce solid waste disposed at landfills generated within their jurisdictions by 50%. AB 341 amended the CIWMA to increase recycling to 75% by 2020. CDW associated with the proposed project will be recycled to the extent practicable with the remainder sent to a landfill. A **less than significant impact** would occur under this threshold.

g) The applicant and project contractor will comply with all local, state, and federal requirements for integrated waste management (e.g., recycling, green waste) and solid waste disposal as required by the CIWMA of 1989 as amended per AB 341. **No impact** would occur under this threshold.

	Potentially Significant Impact	**Less Than Significant With Mitigation Incorporated**	**Less than Significant Impact**	**No Impact**
XX. WILDFIRES -- Would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒

b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☐	☒
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☐	☒

a) The project would install a new pipeline segment and replace an existing segment. Construction would be temporary and any traffic control required for work within or along a roadway would maintain access for emergency vehicles as well as evacuation. The project would have no impact on the implementation of emergency response of evacuation plan; and thus, would have **no impact** under this threshold.

b) Post-construction, all improvements would be subsurface. The improvements would not expose project occupants to pollutant concentrations associated with wildfires. **No impact** would occur under this threshold.

c) The project would improve the reliability of water service within the areas where improvements are programmed. The project would not require the installation of infrastructure or other improvements that could cause or exacerbate wildfire. **No impact** would occur under this threshold.

d) As discussed, the improvements would occur primarily within or along existing road corridors and easements. The area of disturbance required would be minimal and off-road construction between North Broadway and Kellrae Lane would clear a linear corridor that may act as a firebreak or impede the spread of wildfire should one occur. The area of disturbance required for the project would not be extensive enough to contribute to flooding, erosion, landslides, mudflows or other adverse conditions that may occur after a wildfire event. **No impact** would occur under this threshold.

	Potentially Significant Impact	Potentially Significant Unless Mitigation Incorporated	Less than Significant Impact	No Impact
XVIII. MANDATORY FINDINGS OF SIGNIFICANCE —				
a) Does the project have the potential to substantially degrade the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self- sustaining levels, eliminate a plant or animal community, substantially 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?	☐	☒	☐	☐
b) 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)?	☐	☐	☒	☐
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

a) Construction activities would occur primarily within disturbed areas and paved road corridors which are void of vegetation. However, the alignment is located adjacent to trees and shrubs, including vegetation within the Restrictive Covenant area, which are suitable for bird nesting. Further, one oak tree is located along the north side of Kellrae Lane east of Reidy Creek and adjacent to the proposed alignment. Mitigation Measure BIO-1 would address potential impacts to the oak tree located adjacent to Kellrae Lane. Mitigation Measure BIO-2 would address avoidance of impacts to sensitive areas and resources. Mitigation Measure BIO-3 would

address impacts to migratory birds if construction occurs within nesting season. Mitigation Measure BIO-4 would avoid address potential impacts to Least Bell's Vireo and California Coastal Gnatcatcher, both of which are sensitive species, if construction would occur adjacent to habitat within the nesting season.

Although the project area is not anticipated to contain any known paleontological or archaeological resources, it may contain previously undetected subsurface archaeological resources. Mitigation Measures CUL-1 and CUL-2 would minimize or avoid potential impacts to cultural resources should previously undetected subsurface cultural resources and/or human remains be detected during excavation activities. Mitigation Measures TCR-1 through TCR-9 would address potential impacts to Tribal Cultural Resources. Adherence to this measure would reduce cultural impacts to **less than significant**.

b) As presented in the discussion of environmental checklist Sections I through XX, the project would have no impact, a less than significant impact, or a potentially significant impact unless mitigation is incorporated with respect to all environmental issues. With mitigation measures, potentially significant biological, cultural and tribal cultural resources impacts would be reduced to **less than significant**. Based on the limited scope of direct physical impacts to the environment associated with the proposed project, the impacts are project-specific in nature. Consequently, the project along with other cumulative projects would result in a **less than significant** cumulative impact with respect to all environmental issues with mitigation incorporated.

c) In general, impacts to human beings are associated with air quality, hazards and hazardous materials and noise. As presented in the environmental checklist discussions, the project would have no impact or a less than significant impact with respect to these environmental issues. Therefore, the project would have a **less than significant** impact on human beings.

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Tierra Data, Inc., *Biological Resources Report North Broadway Pipeline Replacement Project,* Valley Center, CA, June 2025.

U.S. Geological Survey, Geological Map of the Valley Center 7.5′ Quadrangle, San Diego County, California, 1999.

APPENDIX A – CALEEMOD OUTPUT FILE

Note: Air Quality Technical Report provided as separate attachment

APPENDIX B – BIOLOGICAL RESOURCES REPORT

Note: Biological Analysis provided as separate attachment

APPENDIX C – PHASE I CULTURAL RESOURCES ASSESSMENT

Note: Phase I Cultural Resource Assessment provided as Separate Attachment

APPENDIX D – RESPONSE TO COMMENTS