

**COUNTY OF EL DORADO DEVELOPMENT SERVICES  
ZONING ADMINISTRATOR  
STAFF REPORT**



**Agenda of:** August 19, 2015

**Item No.:** 4.a.

**Staff:** Jennifer Franich

**TENTATIVE PARCEL MAP**

**FILE NUMBER:** P15-0002/Lacey Parcel Map

**APPLICANT:** Dean and Sheryl Lacey (Property Owners)

**ENGINEER:** Northern California Geomatics (Brendan Williams)

**REQUEST:** Tentative Parcel Map to create a subdivision of two single family residential lots measuring 53.8 and 20.1 acres; and

Design Waivers from El Dorado County Design and Improvement Standards Manual (DISM) for the following:

- a. Allow more than 24 lots on a dead end road; and
- b. Allow the roadway width to be left unmodified rather than widening to a minimum of 18 feet per Standard Plan 101C.

**LOCATION:** The property is on the south side of Andy Wolf Road, approximately 2,500 feet west of the intersection with Greenwood Road, in the Garden Valley area, Supervisorial District 4 (Exhibit A).

**APN:** 060-200-59 (Exhibit B)

**ACREAGE:** 73.9 acres

**GENERAL PLAN:** Agricultural Lands (AL) (Exhibit C)

**ZONING:** Estate Residential Ten-Acre (RE-10) (Exhibit D)

**ENVIRONMENTAL DOCUMENT:** Negative Declaration

**RECOMMENDATION:** Staff recommends the Zoning Administrator take the following actions:

1. Adopt the Negative Declaration, based on the Initial Study prepared by staff;
2. Approve Tentative Parcel Map P15-0002, based on the Findings and subject to the Conditions of Approval as presented.
3. Approve the following Design Waivers of El Dorado County Design and Improvement Standards Manual (DISM) based on the Findings presented:
  - a. Allow more than 24 lots on a dead end road; and
  - b. Allow the roadway width to be left unmodified rather than widening to a minimum of 18 feet per Standard Plan 101C.

**PROJECT AND SITE DESCRIPTION:**

The project proposes to create two parcels from a 73.9 acre site (Exhibit E-1). The site was previously divided into two lots in a configuration similar to the proposed map, and then later combined through a lot line adjustment. The site currently features a 2,300 square-foot permanent manufactured dwelling and a 1,168 square-foot single family dwelling. Both units were legally constructed prior to the site being combined into a single parcel in 2000. One dwelling would be located on each of the new parcels, and each house is currently served by its own well and septic system. There is no new construction, tree removal, or other development proposed as part of this project, with the exception of road maintenance activities. With the division of the site, a second dwelling unit could be added to each new parcel. If a second dwelling were constructed, the necessary permitting would be required, ensuring adequate septic capacity, water availability, and access. The site is covered with grasses and some oaks and other trees, and is somewhat flat with gradual sloping toward a pond and affiliated wetlands at the center of the site.

Andy Wolf Road, a county-maintained road, provides access to Parcel 1, and Brumarba Heights Road via Andy Wolf Road, provides access to Parcel 2. Both Andy Wolf Road and Brumarba Heights Road are on non-exclusive road easements. The road width varies from 10 feet to 18 feet. There are some existing turn-outs which allow passing of cars traveling in opposite directions. Both existing dwellings already have driveway encroachments constructed to County standards. According to the General Plan requirements and Transportation Impact Study Guidelines, a traffic study is not required for the project. To increase safety along the existing road, the Transportation Department requires shoulder backing in areas where the existing pavement is two or more inches higher than the earth shoulder. An encroachment permit is required along with possible Traffic Impact Mitigation fees. The application includes a request for design waivers to allow for the following: 1) more than 24 lots accessed via a dead-end road, and 2) roadway width reduced to 10 feet.

**ENVIRONMENTAL REVIEW:**

Staff has prepared an Initial Study (Exhibit F). Staff has determined that there is no substantial evidence that the proposed project would have a significant effect on the environment, and a Negative Declaration has been prepared.

## SUPPORT INFORMATION

Findings	
Conditions of Approval	
Exhibit A.....	Location Map
Exhibit B.....	Assessors Map
Exhibit C.....	General Plan Land Use Map
Exhibit D.....	Zoning Map
Exhibit E-1.....	Tentative Parcel Map; April 2015
Exhibit E-2.....	Tentative Parcel Map with Road Improvements; July 2015
Exhibit F.....	Proposed Negative Declaration and Initial Study

# CONDITIONS OF APPROVAL

## **Tentative Parcel Map P15-0002/Lacey Parcel Map Zoning Administrator/August 19, 2015**

1. This Tentative Parcel Map is based upon and limited to compliance with the project description, the hearing exhibits marked,

Exhibit E-1 .....Tentative Parcel Map: April 2015  
Exhibit E-2 .....Tentative Parcel Map with Road Improvements;  
July 2015

and Conditions of Approval set forth below. Any deviations from the project description, exhibits, or conditions must be reviewed and approved by the County for conformity with this approval. Deviations may require approved changes to the permit and/or further environmental review. Deviations without the above described approval would constitute a violation of permit approval.

The project description is as follows:

The project allows the creation of two parcels from a 73.9-acre site identified by Assessor’s Parcel Number 060-200-59. Both parcels shall be served by individual wells and septic systems. The approval includes the following:

<b>Lot Number</b>	<b>Gross Area</b>	<b>Improvements</b>
1	53.8 acres	Single family home with private well, septic system, four barns/stables and gravel access driveway
2	20.08 acres	Permanent manufactured home with well, septic system, four barns/stables and gravel access driveway

The development, use, and maintenance of the property, the size, shape and the protection and preservation of resources shall conform to the project description above and the hearing exhibits and conditions of approval below. The property and any portions thereof shall be sold, leased or financed in compliance with this project description and the approved hearing exhibits and conditions of approval hereto. All plans must be submitted for review and approval and shall be implemented as approved by the County.

### **Development Services Division**

2. **Permit Time Limits:** This Tentative Parcel Map shall expire 36 months from the date of approval unless a timely extension has been filed.

3. **Fish and Wildlife Fee:** The applicant shall submit to Planning Services a \$50.00 recording fee and the current Department of Fish and Wildlife fee prior to filing of the Notice of Determination by the County. Please submit check for the total amount to Planning Services and make the check payable to El Dorado County. No permits shall be issued or final map filed until said fees are paid.
4. **Indemnity:** In the event of any legal action instituted by a third party challenging the validity of any provision of this approval, the developer and landowner agree to be responsible for the costs of defending such suit and shall hold County harmless from any legal fees or costs County may incur as a result of such action.

The developer and land owner shall defend, indemnify, and hold harmless El Dorado County and its agents, officers, and employees from any claim, action, or proceeding against El Dorado County or its agents, officers, or employees to attack, set aside, void, or annul an approval of El Dorado County concerning a Parcel Map.

The County shall notify the applicant of any claim, action, or proceeding, and the County shall cooperate fully in the defense.

#### **Office of County Surveyor**

5. **Survey Monuments:** All survey monuments shall be set prior to filing the Parcel Map.
6. **Conditions of Approval:** Prior to filing the Parcel Map, a letter shall be required from all agencies that have placed conditions on the map. The letter shall state that “all conditions placed on P15-0002 by (that agency) have been satisfied.” The letter shall be sent to the County Surveyor and copied to the consultant and the applicant.

#### **CAL FIRE**

7. To help mitigate the long dead-end road, CAL FIRE requires a minimum 15 foot vertical clearance along the entire length of Brumarba Heights Road. The road will also need to be maintained so that small trees and brush do not encroach from either side of the road.

#### **Transportation Division**

8. **Road Improvements:** The applicant shall place a minimum of 3 feet of shoulder backing in areas where the existing pavement is 2 inches or higher than the earth shoulder. The shoulder backing shall be compacted and approved by the Transportation Division. In addition, the applicant shall obtain an encroachment permit prior to recording of final map.
9. **TIM Fees:** The applicant shall pay any applicable traffic impact mitigation fees at issuance of building permit.

## **Air Quality Management District**

10. **Fugitive Dust:** The project construction will involve grading and excavation operations, which will result in a temporary negative impact on air quality with regard to the release of particulate matter (PM10) in the form of dust. The project shall adhere to the regulations and mitigation measures for fugitive dust emissions during the construction process. In addition, a Fugitive Dust Mitigation Plan (DMP) Application with appropriate fees shall be submitted to and approved by the AQMD prior to start of project construction. (Rules 223 and 223.1)
11. **Paving:** Project construction will involve road development and shall adhere to AQMD Cutback and Emulsified Asphalt Paving Materials (Rule 224).
12. **Painting/Coating:** The project construction may involve the application of architectural coating, which shall adhere to AQMD Rule 215 Architectural Coatings.
13. **Open Burning:** Burning of wastes that result from "Land Development Clearing" must be permitted through the AQMD. Only vegetative waste materials may be disposed of using an open outdoor fire (Rule 300 Open Burning).
14. **Construction Emissions:** During construction, all self-propelled diesel-fueled engines greater than 25 horsepower shall be in compliance with the California Air Resources Board (ARB) Regulation for In-Use Off-Road Diesel Fueled Fleets (§ 2449 et al, title 13, article 4.8, chapter 9, California Code of Regulations (CCR)). The full text of the regulation can be found at ARB's website here: <http://www.arb.ca.gov/msprog/ordiesel/ordiesel.htm> An applicability flow chart can be found here: [http://www.arb.ca.gov/msprog/ordiesel/faq/applicability\\_flow\\_chart.pdf](http://www.arb.ca.gov/msprog/ordiesel/faq/applicability_flow_chart.pdf) Questions on applicability should be directed to ARB at 1-866-634-3735. ARB is responsible for enforcement of this regulation.
15. **Portable Equipment:** All portable combustion engine equipment with a rating of 50 horsepower or greater shall be registered with the California Air Resources Board (CARB). A copy of the current portable equipment registration shall be with said equipment. The applicant shall provide a complete list of heavy-duty diesel-fueled equipment to be used on this project, which includes the make, model, year of equipment, daily hours of operations of each piece of equipment.

## **FINDINGS**

### **Tentative Parcel Map P15-0002/Lacey Parcel Map Zoning Administrator/August 19, 2015**

#### **1.0 CEQA FINDINGS**

- 1.1 El Dorado County has considered the Negative Declaration together with the comments received and considered during the public review process. The Negative Declaration reflects the independent judgment of the County and has been completed in compliance with CEQA and is adequate for this proposal.
- 1.2 No significant impacts to the environment as a result of this project were identified in the Initial Study.
- 1.3 The documents and other materials which constitute the record of proceedings upon which this decision is based are in the custody of the Development Services Division, Planning Services, at 2850 Fairlane Court, Placerville, CA, 95667.

#### **2.0 GENERAL PLAN FINDINGS**

##### **2.1 The project is consistent with General Plan Policy 2.2.1.2**

Policy 2.2.1.2 identifies that the AL designation establishes areas for agriculture and residential uses to support agriculture uses and that AL may be applied in Rural Regions only or be determined to be well suited for agricultural production by the County Department of Agriculture.

Rationale: The General Plan designates the subject site as Agricultural Lands (AL). The Department of Agriculture reviewed the application materials for this project and determined that the General Plan Policy 2.2.2.2 (B) has been met as both proposed parcels meet the requirements for minimum parcel size (20 acres) for lands containing choice soils within an Agricultural District.

##### **2.2 The project is consistent with General Plan Policy 2.2.5.21**

General Plan Policy 2.2.5.21 requires that development projects be located and designed in a manner that avoids incompatibility with adjoining land uses.

Rationale: The project site is surrounded by rural residential development and small-scale agriculture, with the Garden Valley rural center nearby to the south. The new parcels will be similar in size to the surrounding parcels, and there will be no change in use, which is currently compatible with the adjoining existing development. The proposed parcel sizes are similar to those surrounding the site, and use is consistent and compatible with the development pattern in the immediate surroundings.

**2.3 The project is consistent with General Plan Policy 5.2.1.2**

General Plan Policy 5.2.1.2 requires that adequate quantity and quality of water for all uses, including fire protection, be provided with proposed development. Both lots within the project site have separate wells, which provide domestic water and water for fire protection.

Rationale: Each lot is currently served by a well. Well testing was conducted for each well to determine adequate water supply. The report was included for review as part of the application materials and approved by the Division of Environmental Management and Garden Valley Fire Protection District.

**2.4 The project is consistent with General Plan Policy 5.2.3.4**

General Plan Policy 5.2.3.4 requires all applications for divisions of land which rely on groundwater for domestic use demonstrate that groundwater is adequate as part of the review and approval process. Water wells are required to be constructed to the standards specified in "Water Well Standards", State of California, Department of Water Resources, Bulletin 74-81 (and supplements); and must be capable of providing to each connection a minimum of five gallons per minute, either from the well itself or a combination of well and storage, at a minimum of 15 pounds per square inch pressure.

Rationale: Two wells have been constructed at the site to domestic supply well specifications. Well testing was conducted for each well to determine adequate water supply. The report was included for review as part of the application materials and approved by the Division of Environmental Management and Garden Valley Fire Protection District. The property owner has demonstrated to the satisfaction of the Environmental Management Division that a safe and reliable water source will be provided to each parcel and would be consistent with the General Plan.

**2.5 The project is consistent with General Plan Policy 5.7.1.1**

General Plan Policy 5.7.1.1 Fire Protection in Community Regions, requires the applicant to demonstrate that adequate emergency water supply, storage, conveyance facilities, and access for fire protection would be provided concurrent with development.



Rationale: The Garden Valley Fire Protection District would provide fire protection service to the project site and ensure that water supplied to the parcels is adequate to meet emergency fire needs. The Garden Valley Fire Protection District submitted a letter regarding the parcel split and approved the use of the existing road for fire access. The homes on the property both have adequate wells that meet the standards for pump rates. The two existing homes were built with approved building permits that included Fire District approval. Since no development is proposed, the project would not need a fire safe plan. The California Department of Forestry and Fire Protection (CalFire) reviewed the application and requires brush removal and maintenance for emergency access along Andy Wolf Road and Brumarba Heights Road. With the incorporation of these requirements, the project is in compliance with these General Plan policies related to fire protection.

**2.6 The project is consistent with General Plan Policy 6.2.2.2**

Policy 6.2.2.2, Wildland Fire Hazards, requires that the County preclude development in high and very high wildland fire hazard areas unless such development can be adequately protected from wildland fire hazards, as demonstrated in a Fire Safe Plan prepared by a Registered Professional Forester (RPF) and approved by the local Fire Protection District and/or California Department of Forestry and Fire Protection.

Rationale: The property is located in a Very High Fire Hazard Zone. The Garden Valley Fire Protection District submitted a letter approving the existing roads for adequate fire access and made no comment to require a fire safe plan. CAL FIRE reviewed the application and submitted a letter requiring vertical and lateral clearance for emergency access. The two existing homes were built with approved building permits which included Fire District approval. Since there is no new development proposed with this parcel map, a fire safe plan is not required and the project is in compliance with this policy.

**2.7 The project is consistent with General Plan Policy 6.2.3.2**

Policy 6.2.3.2, Adequate Access for Emergencies, requires that the applicant demonstrate that adequate access exists, or can be provided to ensure that emergency vehicles can access the site and private vehicles can evacuate the area.

Rationale: The Transportation Division reviewed the application and required shoulder backing along the Andy Wolf Road. No new roads are required to access the two parcels and the existing homes and driveways have been permitted. Both Garden Valley Fire Protection District and CalFire reviewed the application materials and will not require additional site access or improvement to the existing roads. The project is in compliance with this policy.

**2.8 The project is consistent with General Plan Policy 7.1.2.1**

General Plan Policy 7.1.2.1 directs that development or disturbance shall be prohibited on slopes exceeding 30 percent unless necessary for access.

Rationale: The existing structures are built on areas of the property that avoid any slopes exceeding 30 percent. No new development is proposed on either parcel. The project is in compliance with the policy related to steep slopes.

**2.9 This project is consistent with General Plan Policy 7.4.4.4**

General Plan Policy 7.4.4.4 requires the applicant to demonstrate that adequate development area exists on each of the proposed parcels where a single family dwelling and related improvements could be built without the removal of oak trees or without project mitigation.

Rationale: Two homes already exist at the site and will become the primary residence for each parcel. The applicant is not proposing any new development of the property. However, an additional dwelling unit could be constructed on each of the two lots. Any future development could be located on areas of the site that would not contain oak trees, as most of the property is not currently covered with trees. Future construction would be required to comply with General Plan Policy 7.4.4.4 during the grading and building permit process if the requirements of Section 130.22.330 of the Zoning Ordinance are met.

**2.10 This project is consistent with General Plan Policy 8.1.4.1**

General Plan Policy 8.1.4.1 requires that the County Agricultural Commission review all discretionary development applications and the location of proposed public facilities involving land zoned for or designated agriculture, or lands adjacent to such lands, and shall make recommendations to the reviewing authority.

Before granting approval, a determination shall be made by the approving authority that the proposed use:

- A. *Will not intensify existing conflicts or add new conflicts between adjacent residential areas and agricultural activities; and*

Rationale: In accordance with Policy 8.1.4.1 of the Agriculture and Forestry Element of the General Plan, the application was sent to the Agricultural Commission for review and comment. The Department of Agriculture did not have any concerns about the project since both properties meet the minimum parcel size of 20 acres. Because the land use is not changing from residential agriculture, the parcel split will not intensify existing conflicts or add new conflicts between adjacent residential areas and agricultural activities.

*B. Will not create an island effect wherein agricultural lands located between the project site and other non-agricultural lands will be negatively affected; and*

Rationale: The Department of Agriculture did not have any concerns about the project, since both properties meet the minimum parcel size of 20 acres. The lots will remain large enough for agricultural use, and will not negatively affect other agricultural lands.

*C. Will not significantly reduce or destroy the buffering effect of existing large parcel sizes adjacent to agricultural lands.*

Rationale: In accordance with Policy 8.1.4.1 of the Agriculture and Forestry Element of the General Plan, the project will not reduce the buffering effect of existing large parcels adjacent to agricultural lands. Although the parcel split will result in two smaller lots, each lot will remain twenty or more acres in size. The land use is not changing and no development is proposed as part of this project.

### **3.0 ZONING FINDINGS**

#### **3.1 The proposed use is consistent with Title 130.**

The parcel is zoned Estate Residential Ten-Acre (RE-10). The project has been analyzed in accordance with Zoning Ordinance Section 130.28.210 (Development Standards) for minimum lot size, widths and building setbacks.

Rationale: The proposed lots meet the minimum lot size and width standards. The existing homes, detached garage, and barn are compliant with the setback requirements of the Zoning Ordinance. The project, as proposed and conditioned, is consistent with the Zoning Ordinance because the parcels have been designed to comply with the Estate Residential Ten-Acre (RE-10) development standards as provided within Section 130.28.210 of the County Code.

### **4.0 DESIGN WAIVER FINDINGS**

The El Dorado County Design and Improvement Standards Manual (DISM), Volume III, Section 3.12 states that the maximum dead-end street length may exceed 500 feet but not be more than 2,640 feet, when geographic features restrict a street extension and the street will not serve more than 24 existing or potential parcels. Per the DISM, the width for Andy Wolf Road and Brumarba Heights Road is to follow Standard Plan 101C which requires a roadway width of 18 feet within a 50 foot right-of-way. The applicant is requesting a waiver from these design standards.

Section 120.40.010 of the El Dorado County Minor Land Divisions Ordinance provides that the County may grant a waiver or conditional waiver upon finding that each of the following conditions exist:

- A. *There are special conditions or circumstances peculiar to the property proposed to be divided which would justify the adjustment or waiver;*
- B. *Strict application of the design or improvement requirements of this subpart would cause extraordinary and unnecessary hardship in developing the property;*
- C. *The adjustment or waiver would not be injurious to adjacent properties or detrimental to the health, safety, convenience and welfare of the public;*
- D. *The adjustment or waiver would not have the effect of nullifying the objectives of this subpart or any other law or ordinance applicable to the division.*

4.1 **Design Waiver Request 1: Allow more than 24 lots on Andy Wolf Road and Brumarba Heights Road, a dead-end road that is currently substantially longer than 2,640 feet.**

- A. *There are special conditions or circumstances peculiar to the property proposed to be divided which would justify the adjustment or waiver.*

Rationale: Strict application of the design standards would require that the access road be no longer than 2,640 feet. The roads providing access to the site and in the immediate vicinity have existed for many years in the current configuration, and the creation of one additional parcel will not substantially change the amount of traffic or the availability of emergency response. Additional routes to access the property are not feasible due to the terrain in the area, the presence of oak trees, and the presence of the pond at the property, which would be impacted with the construction of a road or access driveway from the new lot. In addition, the site was previously configured as two lots, and the existing roads were adequate to serve that number of lots in the past. Though the parcel split would allow for two additional dwelling units to be constructed, it will not change a use that exists currently, and the created parcels will match the land use pattern in the area.

- B. *Strict application of the design or improvement requirements of this subpart would cause extraordinary and unnecessary hardship in developing the property.*

Rationale: The dead-end roads currently serve many homes which have existed in the current configuration for many years. Requiring additional access roads to be constructed solely by the applicant would result in undue hardship, which would be unnecessary as the current configuration is sufficient according to Cal Fire, Garden Valley Fire Protection District, and the Transportation Division.

- C. *The adjustment or waiver would not be injurious to adjacent properties or detrimental to the health, safety, convenience and welfare of the public.*

Rationale: Cal Fire, Garden Valley Fire Protection District, and the Transportation Division reviewed the application and support the current configuration of the roadway. The shoulder and the improvements required as conditions of approval along this reduced width roadway will allow for emergency vehicle access if needed, and will allow vehicles to safely pass.

*D. The adjustment or waiver would not have the effect of nullifying the objectives of this subpart or any other law or ordinance applicable to the division.*

Rationale: With a waiver from this design standard, the project would still be consistent with zoning regulations and general plan policies. No significant impacts were identified in the Initial Study, which incorporated the design waivers as part of the project description. Leaving the roads unmodified would not be in conflict with or nullify the objectives of any other ordinance or standard.

**4.2 Design Waiver Request 2: Allow Andy Wolf Road and Brumarba Heights road to remain unmodified at a range of 10 to 18 feet wide.**

*A. There are special conditions or circumstances peculiar to the property proposed to be divided which would justify the adjustment or waiver.*

Rationale: The construction of a wider roadway would result in the removal of mature oak trees that currently exist along the road. Cal Fire, Garden Valley Fire Protection District, and the Transportation Division reviewed the application and support the reduced standard width of the roadway. The shoulder and the improvements required as conditions of approval along this reduced width roadway will allow for emergency vehicle access if needed, and will allow vehicles to safely pass.

*B. Strict application of the design or improvement requirements of this subpart would cause extraordinary and unnecessary hardship in developing the property.*

Rationale: The length of the road to access the site is over a mile in length, and the improvement of the road would cause extraordinary hardship for the development of one additional parcel. Widening the road would also necessitate the removal of several trees and other vegetation. According to Cal Fire, Garden Valley Fire Protection District, and the El Dorado County Transportation Division, road widening is not necessary for this project, so strict application of the standards would cause unnecessary hardship for the applicant.

*C. The adjustment or waiver would not be injurious to adjacent properties or detrimental to the health, safety, convenience and welfare of the public.*

Rationale: Cal Fire, Garden Valley Fire Protection District, and the Transportation Division reviewed the application and support the reduced standard width of the roadway. The shoulder and the improvements required as conditions of approval along this reduced width roadway will allow for emergency vehicle access if needed, and will allow vehicles to safely pass. The potential addition of up to two dwelling units may add vehicle trips to the roads, but these trips are not substantial enough to be detrimental to the safety or convenience of the neighborhood.

*D. The adjustment or waiver would not have the effect of nullifying the objectives of this subpart or any other law or ordinance applicable to the division.*

Rationale: With a waiver from this design standard, the project would remain consistent with zoning regulations and general plan policies. No significant impacts were identified in the Initial Study, which incorporated design waiver implications as part of the project description. Leaving the roads unmodified would not be in conflict with or nullify the objectives of any other ordinance or standard.

## **5.0 PARCEL MAP FINDINGS**

### **5.1 The proposed tentative map, including design and improvements, is consistent with the General Plan.**

Rationale: The proposed Parcel Map is consistent with the General Plan as set forth in Finding 2.0.

### **5.2 The proposed Parcel Map conforms to the applicable standards and requirements of the County zoning regulations and Minor Land Division Ordinance.**

Rationale: The parcels have been analyzed in accordance with Section 130.28.210 (Development Standards) of the Zoning Ordinance and comply with the required minimum lot area and minimum lot width requirements. As proposed and conditioned, the Parcel Map conforms to the Minor Land Division Ordinance.

### **5.3 The site is physically suitable for the proposed type and density of development.**

Rationale: The proposed development meets the density requirements of the Agricultural Lands (AL) land use designation and conforms to the minimum parcel size and development standards of the RE-10 zone district.

5.4 **The proposed subdivision is not likely to cause substantial environmental damage.**

Rationale: The project impacts have been analyzed in the Initial Study, which resulted in a Negative Declaration. The project would not cause substantial environmental damage.