County of San Diego
DEPARTMENT OF GENERAL SERVICES
5560 OVERLAND AVENUE, SUITE 410, SAN DIEGO, CA 92123
(858) 694-2338

MARKO MEDVED, PE, CEM
DIRECTOR

NICOLE J. ALEJANDRE
ASSISTANT DIRECTOR

November 17, 2023

Environmental Review Update Checklist Form
For Projects with Previously Approved Environmental Documents

FOR PURPOSES OF CONSIDERATION OF THE PASEO NORTE SENIOR AFFORDABLE HOUSING PROJECT

The California Environmental Quality Act (CEQA) Guidelines Sections 15162 through 15164 set forth the criteria for determining the appropriate additional environmental documentation, if any, to be completed when there is a previously adopted Mitigated Negative Declaration (MND) covering the project for which a subsequent discretionary action is required. This Environmental Review Update Checklist Form has been prepared in accordance with CEQA Guidelines Section 15164(e) to explain the rationale for determining whether any additional environmental documentation is needed for the subject discretionary action.

1. Background on the previously adopted MND.

In 2017, an Initial Study/Mitigated Negative Declaration (IS/MND) (herein referred to as the 2017 IS/MND) was adopted for the Ramona Intergenerational Community Campus (RICC) Project (herein referred to as the previous project or 2017 project), which consisted of a 12,500 square foot (sf) senior center, 5,000 sf adult day care center, a 14,000 sf gymnasium and teen café, a 10,000 sf family resource center, a 20,000 sf childcare center, a 3,660 sf community support center, a play area, skate park, amphitheater, softball field, and associated parking and utilities. The 2017 IS/MND is attached as Appendix A.

The 2017 IS/MND considered a 14-acre project site (also known as the main project site) consisting of seven parcels in total (Assessor Parcel Numbers [APNs] 760-157-49, 281-182-12, 281-182-13, 281-182-18, 281-182-17, 281-191-03, and 281-191-02). Three of these parcels had been owned by the County (APN 281-182-13, APN 281-182-12, and APN 760-157-49) and two of the parcels were privately owned (APN 281-182-18, and APN 281-182-17). The southeastern portion of the main project site included two 0.69-acre parcels owned by Caltrans (APN 281-191-03 and APN 281-191-02).

The 2017 IS/MND also considered two County-owned replacement parcels APNs 281-122-18 and 291-122-18, in exchange for the two Caltrans parcels located at the main project site. The first County-owned replacement parcel was located in Julian (APN 291-122-18), and the other in Ramona (APN 281-122-18), and were 0.65 acres, and 0.55 acres in size, respectively. Upon acquisition of the private parcels and exchange of Caltrans parcels, the main project site would

be developed. The adopted 2017 IS/MND found the previous project would not have any significant environmental effects with implementation of mitigation measures to reduce impacts to biological resources, cultural resources, hydrology and water quality, transportation/traffic, and utilities and service systems.

2. Lead agency name and address:

County of San Diego, Department of General Services
5560 Overland Avenue, Suite 410
San Diego, CA 92123

Contact: Marcus Lubich, Project Manager
Phone number: (858) 414-4593
E-mail: Marcus.Lubich@sdcounty.ca.gov

3. Project applicant's name and address:

Wakeland Housing and Development Corporation
1230 Columbia Street, Suite 950
San Diego, CA 92101

4. Summary of the activities authorized by present permit/entitlement application:

Introduction

Since October 1999, the community of Ramona has been pursuing the concept of a multi-purpose community campus to accommodate affordable senior housing, a family resource center, a library, senior center, and other community facilities with connectivity to the proposed Santa Maria Creek Greenway Trail. In furtherance of that concept, the County of San Diego (County) acquired land in 2009 on State Route 67 (Main Street) between 12th Street to the east, 13th Street to the west, and Santa Maria Creek to the north, in the community of Ramona. In 2014, the County approved and constructed the Ramona Branch Library at the intersection of 13th Street and Main Street. As previously detailed, in 2017, an IS/MND was adopted for the RICC Project, which included a senior center, adult day care center, community gymnasium and teen café, family resource center, community support center, childcare center, and outdoor recreational amenities. While approved, construction of the 2017 project never commenced. Since approval of the 2017 project, state and county priorities have shifted towards affordable housing projects to help alleviate the existing housing crisis.

The proposed Paseo Norte Senior Affordable Housing Project (or proposed project) includes a Disposition and Development Agreement, Minor Use Permit (ZAP), Boundary Adjustment, and a Density Bonus application to authorize a mixed-use development, consisting of affordable residential housing for low-income seniors, a senior center, a Ramona Program for All-Inclusive Care for the Elderly (PACE) Wellness Center, trail connectivity and recreational uses. While the proposed project includes the addition of affordable housing, it also includes elements of the 2017 project, including the senior center, adult day care facility (now referred to as the PACE Wellness Center), trail connectivity and public park uses adjacent to the Santa Maria Creek, as well as parking and various infrastructure improvements to support the new facilities.

Other elements of the 2017 project that are no longer part of this project would be carried out by the County on the remaining RICC project area, at a later date under a separate CEQA process, which would include the community support center, community gymnasium and teen café, childcare center, and recreational elements such as a skatepark and amphitheater. The family resource center element of the 2017 project is currently under construction near the intersection of Main Street and 12th Street, and is anticipated to be complete Fall 2024.

Project Location

The proposed project site occupies 7.86 acres of the previous 14-acre RICC site within the community of Ramona in unincorporated San Diego County, as shown in ***Figure 1, Regional Location***. The project site is located on APNs 281-182-17 and 281-182-18. The project site is generally bound by Walnut Street and Santa Maria Creek to the north; the terminus of 12th Street and vacant parcels to the east; vacant land with multiple degraded concrete pads to the south; and Maple Street/13th Street and a salvage yard to the west, as shown in ***Figure 2, Project Site and Vicinity.***

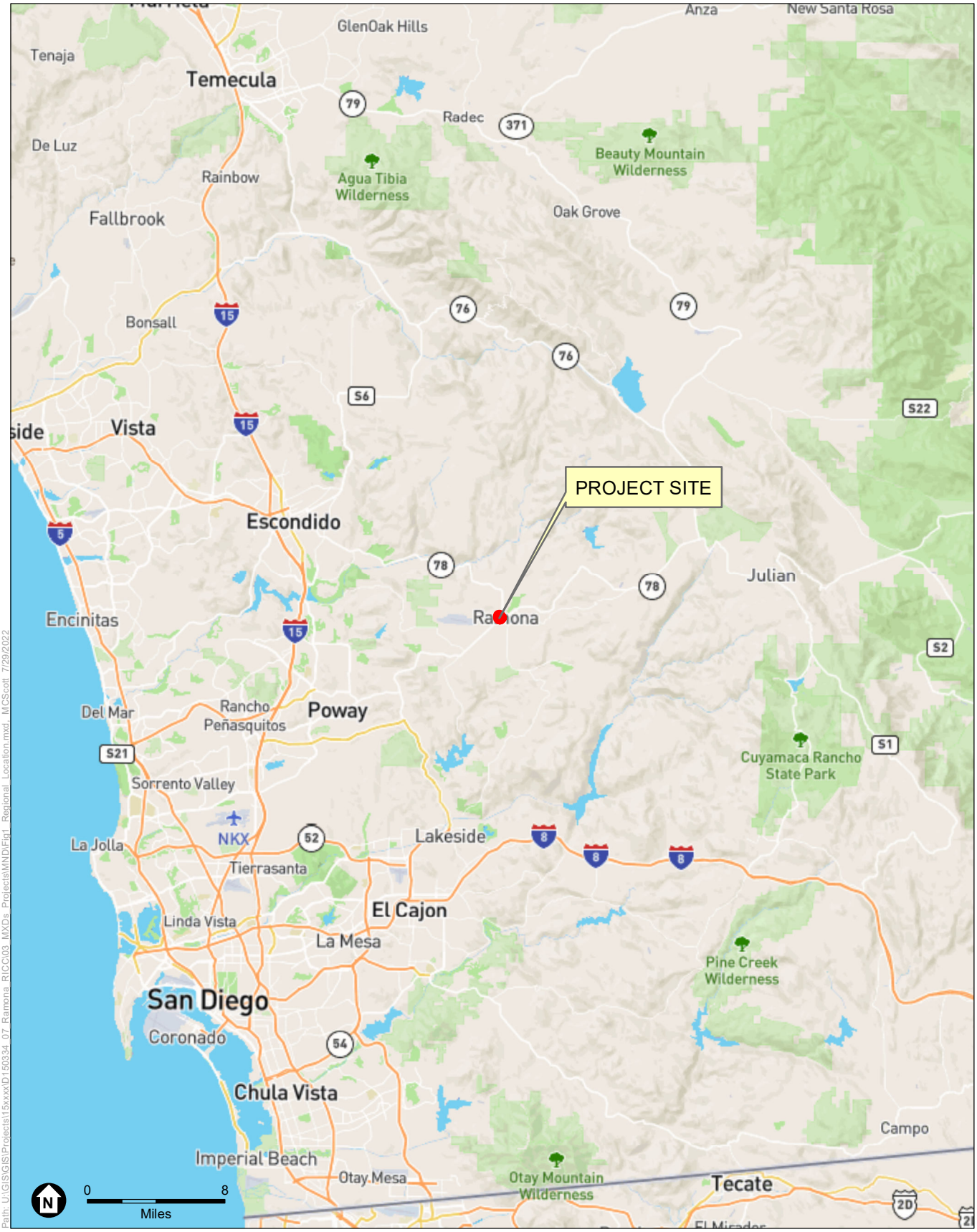
The proposed project site is located in the Paseo Sub-Area of the Ramona Village Center, which is an area identified in the Ramona Community Plan. The project site is zoned as V4 General District, V2 Rural District, and V1 Natural District. According to the San Diego County General Plan, the project site is designated as Rural Commercial (C-4), Rural Lands (RL-20), and High Impact Industrial.

Project Description

Senior Group Residential Housing, Senior Center, and Program for All-Inclusive Care for the Elderly Wellness Center

As shown in ***Figure 3, Site Plan***, the proposed project would consist of approximately 100 affordable residential units for low-income seniors, which would include 85 one-bedroom units and 15 two-bedroom units. Residential units would be located within an approximately 77,500 sf two-story building with a maximum height of 35 feet arranged around a courtyard near the southeastern portion of the project site. The ground floor of the residential building would include a lobby, lounge, senior center, a common kitchen, two laundry rooms, and 42 one- bedroom units and 8 two-bedroom units. The ground floor would also include an outdoor terrace with a fire feature adjacent to the lobby and lounge. The senior center would be 1,800 sf and would include a lobby, multiuse room, kitchen, dining area, and restrooms. The residential building's second floor would include two laundry rooms, 43 one-bedroom units, and 7 two-bedroom units. The residential building's interior courtyard would include a barbeque area, bocce ball court, and community gardens. The two-story residential building would be designed to be neutral-toned, featuring stone cladding, wood details, lap siding, and stucco materials.

An approximately 5,000 sf single-story PACE Wellness Center with a maximum height of 20 feet would be located west of the residential building. The PACE Wellness Center would include a lobby with reception area, exam rooms, physical therapy area, staff lounge and locker rooms, storage and service spaces, and restrooms. Similar to the residential building, the PACE Wellness Center would include lap siding and wood details with a stone cladded outdoor fire feature and chimney.



SOURCE: OpenStreet Map, 2021

Paseo Norte Senior Affordable Housing Project

Figure 1
Regional Location

ESA

SOURCE: ESRI

Paseo Norte Senior Affordable Housing Project

Figure 2
Project Site and Vicinity

ESA

D150334.00 - County of San Diego General Services As-Needed\02 Active Tasks\D150334.07 - Ramona RICC\05 Graphics-GIS-Modeling

SOURCE: Wakeland, 2022

Paseo Norte Senior Affordable Housing Project

Figure 3
Site Plan

ESA

Implementation of the residential building (which would include the senior center) and PACE Wellness Center would require the construction of utility services and relocation (or undergrounding) of utility lines, including water, wastewater, storm drainage, electricity, telecommunications, and solid waste disposal areas, per coordination with the utility company. The proposed project would be designed with an all-electric building design and project buildings would not utilize natural gas or include natural gas infrastructure. The proposed project would be constructed to achieve GreenPoint Rated certification. In addition, shielded security and landscaping lighting would be placed outdoors in public areas.

Pursuant to the County of San Diego Zoning Ordinance (ZO) Section 6365, the proposed project would likely utilize all four development incentives to waive requirements for parking, a 25 percent commercial building requirement, design requirements, and height and/or story requirements in order to build affordable housing in this location.

The proposed project includes a Disposition and Development Agreement, Minor Use Permit (ZAP), Boundary Adjustment, and a Density Bonus application to authorize a mixed-use development.

Public Park

The proposed project would include a public park located north of the residential and PACE Wellness Center uses, extending to the Santa Maria Creek. The public park area would be vegetated with shade trees and grasses. In addition, a looped multipurpose trail would span the perimeter of the southern portion of the public park area, with multiple shade structures and picnic benches located at various points along the trail. The multipurpose trail would be approximately 5,000 linear feet and six to eight feet wide. In the northern portion of the proposed public park area, south of Santa Maria Creek, the multipurpose trail would connect to a proposed extension of the Santa Maria Creek Greenway Trail, which would cross the project site in an east to west direction. This portion of the trail would allow for equestrian uses. The walking path would be composed of decomposed granite pavement. The public park area would also include two pickleball courts and a tot lot, located adjacent to and within the multipurpose loop. The public park would be constructed by the affordable housing developer. Upon successful completion of construction, the active and passive park spaces, consisting of approximately 4.39 acres, would be dedicated to County of San Diego, Department of Parks and Recreation (DPR). DPR would assume ownership responsibilities including all maintenance and management responsibilities associated with the park spaces.

Parking and Circulation

The proposed project would include two parking lots: senior center and PACE Wellness Center parking to the north of the PACE Wellness Center, and senior residential parking to the north of the residential building. The two parking lots would have egress and ingress via the terminus of 12th Street and via 13th Street. The proposed project would include approximately 98 parking spaces total. The senior residential parking lot would include approximately 73 parking spaces, and the western lot serving the senior center and PACE Wellness Center would include 25 spaces. The project would require 147 parking spaces pursuant to Section 6750 of the ZO but a reduction in parking spaces would be allowed pursuant to Density Bonus Section 6350 of the ZO.

Roadway improvements to 13th Street are being proposed and analyzed as part of the 13th Street Bridge Project [SCH# 2021100070], by the County Department of Public Works (DPW). The

current project frontage along 13th Street/Maple Street is an existing dirt road, which would be improved to County Road Standards as part of the 13th Street Bridge Project. The 13th Street Bridge Project would provide a new vehicular bridge spanning the Santa Maria Creek, and roadway and pathway improvements to 13th Street and Willow Road. As noted above, this project would construct a curb cut to provide ingress and egress to the project site from 13th Street.

Pedestrian improvements would include construction of periphery sidewalks along 12th street (sidewalk pedestrian improvements along 13th Street are being proposed and analyzed as part of the 13th Street Bridge Project [SCH # 2021100070]). Additionally, pedestrian paths landscaped with shrubs and shade trees would be located throughout the site, including along the exterior perimeter of the buildings. A paseo would be located between the proposed residential building/senior center and PACE Wellness Center, which would expand from the public park area through the parking lot, to the southern project boundary. All pedestrian improvements would include Americans with Disabilities Act (ADA) accessible walkways, ramps, and entrances.

Construction

Construction of the proposed project would occur in five phases, as detailed in **Table 1***, Construction Phases and Equipment*. Construction would occur 6 days per week, consistent with Section 36.408 of the County Code of Ordinances, over a total of 23 months starting in the winter of 2025. A maximum of 500 cubic yards (cy) of soil would be excavated and a maximum of 5,500 cy of fill would be imported. Maximum ground disturbance depths are expected to reach depths of up to five feet below ground surface. Construction would occur within permitted working hours, in compliance with the San Diego County Code of Regulatory Ordinances. Staging for the project would occur on-site.

Table 1
Construction Phases and Equipment

Phase	Activity	Duration	Approximate Construction Workers	Typical Construction Equipment
1	Site Preparation	1 month	9	Rubber Tired Dozer Tractors/Loaders/Backhoes
2	Grading/Excavation	1 months	10	Graders Excavators Rubber Tired Dozers Tractors/Loaders/Backhoes
3	Building and Park Construction	23 months (concurrent with Paving and Architectural Coating)	115	Cranes Forklifts Generator Sets Tractors/Loaders/Backhoes Welders
4	Paving	9 months (concurrent with Building Construction and Architectural Coating)	8	Pavers Paving Equipment Rollers
5	Architectural Coating	5 months (Concurrent with Building Construction and Paving)	23	Air Compressors

Operation

The proposed project site is currently owned by the County of San Diego. Per the Disposition and Development Agreement, the affordable housing developer would acquire the entirety of both APNs (281-182-17 and 281-182-18) from the County. Upon acquisition, the affordable housing developer will process a Boundary Adjustment to separate park from the affordable housing, PACE Clinic, and senior center, and a Minor Use Permit with PDS, and then the affordable housing developer would construct the site as outlined above. Upon successful completion of construction, the parcel with the active and passive park spaces, consisting of approximately 4.39 acres, would be dedicated back to County of San Diego DPR. DPR would assume ownership responsibilities including all maintenance and management responsibilities associated with the park spaces.

Both the proposed senior center and the PACE Wellness Center would provide services to the residents living within the project site, as well as the surrounding community, enhancing the level of senior services available and allowing for an aging in place opportunity. These services would include care management and care coordination, medical care, physical and occupational therapies, home based outreach and services, assistance with activities of daily living, behavioral health services, recreational activities, nutritional meals, and transportation.

The senior center and PACE Wellness Center would operate between 8:00 a.m. to 8:00 p.m. Monday through Friday and 8:00 a.m. to 5:00 p.m. Saturday and Sunday. The senior center would be staffed by approximately three full time employees. There would also be eight full time employees staffed for the senior housing units and a maximum of 24 employees at the PACE Wellness Center.

5. Does the project for which a subsequent discretionary action is now proposed differ in any way from the previously approved project?

YES	NO
☒	☐

If yes, describe **ALL** differences.

The previous project site, approved in 2017, consisted of seven parcels in total (including three County-owned parcels and adjacent Caltrans-owned parcels, as well as the two Caltrans replacement parcels). Certain elements of the previous project have remained the same; however, the project site decreased in size from 14 acres in 2017 to 7.86 acres currently. The proposed project would consist of APNs 281-082-17 and 281-182-18. The five parcels located to the southeast of the project site are no longer considered (APNs 760-157-49, 281- 0182-13, 281-182-12, 281-191-03, and 281-191-02). In addition, the two Caltrans replacement parcels located in Julian and Ramona (APNs 281-122-18 and 291-122-18) are not part of the current proposal.

As detailed below in **Table 2**, *Comparison of the 2017 Project and the Proposed Project*, elements of the previous project that would not be included as part of the current project consist of the community gymnasium and teen café, childcare center, community support center, play area, skate park, amphitheater, and softball field. The family resource center is currently under

construction on the adjacent Caltrans parcel and is anticipated to be complete by Fall 2024, prior to construction of the proposed project.

Table 2
Comparison of the 2017 Project and the Proposed Project

Use	2017 Project	Proposed Project	Status/Notes
Senior center	12,500 sf	1,800 sf	To be located within the proposed residential building.
Adult day care center (now known as the PACE Wellness Center)	5,000 sf	5,000 sf	
Community gymnasium and teen café	14,000 sf	Not included	Not included as part of the proposed project
Childcare center	20,000 sf	Not included	Not included as part of the proposed project
Family resource center	10,000 sf	Not included	Currently under construction at the intersection of Main Street and 12th Street. Construction is anticipated to be completed prior to the proposed project.
Community support center	3,660 sf	Not included	This space is now provided in the existing Ramona Library
Public park uses	Amphitheater, skatepark, softball field, walking trails, open space	Pickleball courts, tot lot, multipurpose trails, and open space	Amphitheater and skatepark future to be determined (not included as part of the proposed project). The softball field has been replaced with pickleball courts and a tot lot.
Senior affordable housing	Not included	100 units (75,700 sf)	The residential building includes the senior center. The residential component plus the senior center total a building size of 77,500 sf.
Parking	230 spaces	98 spaces	

The proposed project would include elements of the previous project, including the senior center, PACE Wellness Center (previously known as the adult day care center), associated parking, and open space. The senior center has reduced in size from a 12,500 sf footprint to a 1,800 sf footprint, and would be located within the proposed residential building. The proposed project includes the addition of affordable residential housing for low-income seniors. New elements of the proposed project that were not included in the 2017 project are the affordable residential housing for seniors, a tot lot, and pickleball courts.

6. **SUBJECT AREAS DETERMINED TO HAVE NEW OR SUBSTANTIALLY MORE SEVERE SIGNIFICANT ENVIRONMENTAL EFFECTS COMPARED TO THOSE IDENTIFIED IN THE PREVIOUS MND.** The subject areas checked below were determined to be new significant environmental effects or to be previously identified effects that have a substantial increase in severity either due to a change in project, change in circumstances or new information of substantial importance, as indicated by the checklist and discussion on the following pages.

☐ NONE

☐ 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 and Planning	☐ Mineral Resources
☐ Noise	☐ Population & Housing	☐ Public Services
☐ Recreation	☐ Transportation/Traffic	☐ Tribal Cultural Resources
☐ Utilities & Service Systems	☐ Wildfire	☐ Mandatory Findings of Significance

DETERMINATION

On the basis of this analysis, Planning & Development Services has determined that:

☐ No substantial changes are proposed in the project and there are no substantial changes in the circumstances under which the project will be undertaken that will require major revisions to the previous EIR or MND due to the involvement of significant new environmental effects or a substantial increase in the severity of previously identified significant effects. Also, there is no "new information of substantial importance" as that term is used in CEQA Guidelines Section 15162(a)(3). Therefore, the previously adopted MND or previously certified EIR is adequate upon completion of an Addendum.

☐ No substantial changes are proposed in the project and there are no substantial changes in the circumstances under which the project will be undertaken that will require major revisions to the previous EIR or MND due to the involvement of significant new environmental effects or a substantial increase in the severity of previously identified significant effects. Also, there is no "new information of substantial importance" as that term is used in CEQA Guidelines Section 15162(a)(3). Therefore, because the project is a residential project in conformance with, and pursuant to, a Specific Plan with a EIR completed after January 1, 1980, the project is exempt pursuant to CEQA Guidelines Section 15182.

☒ Substantial changes are proposed in the project or there are substantial changes in the circumstances under which the project will be undertaken that will require major revisions to the previous MND due to the involvement of significant new environmental effects or a substantial increase in the severity of previously identified significant effects. Or, there is "new information of substantial importance," as that term is used in CEQA Guidelines Section 15162(a)(3). However all new significant environmental effects or a substantial increase in severity of previously identified significant effects are clearly avoidable through the incorporation of mitigation measures agreed to by the project applicant. Therefore, a SUBSEQUENT MND is required.

☐ Substantial changes are proposed in the project or there are substantial changes in the circumstances under which the project will be undertaken that will require major revisions to the previous MND or EIR due to the involvement of significant new environmental effects or a substantial increase in the severity of previously identified significant effects. Or, there is "new information of substantial importance," as that term is used in CEQA Guidelines Section 15162(a)(3). Therefore, a SUBSEQUENT or SUPPLEMENTAL EIR is required.

_____ _____

Signature Date

_____ _____

Printed Name Title

INTRODUCTION

CEQA Guidelines Sections 15162 through 15164 set forth the criteria for determining the appropriate additional environmental documentation, if any, to be completed when there is a previously adopted MND or a previously certified EIR for the project.

CEQA Guidelines, Section 15162(a) and 15163 state that when an MND has been adopted or an EIR certified for a project, no Subsequent or Supplemental EIR or Subsequent Mitigated Negative Declaration shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in light of the whole public record, one or more of the following:

1. Substantial changes are proposed in the project which will require major revisions of the previous EIR or Mitigated Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

2. Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Mitigated Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.

3. New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Mitigated Negative Declaration was adopted, shows any of the following:

    a. The project will have one or more significant effects not discussed in the previous EIR or Mitigated Negative Declaration; or

    b. Significant effects previously examined will be substantially more severe than shown in the previously adopted Mitigated Negative Declaration or previously certified EIR; or

    c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or

    d. Mitigation measures or alternatives which are considerably different from those analyzed in the previous Mitigated Negative Declaration or EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

CEQA Guidelines, Section 15164(a) states that an Addendum to a previously certified EIR may be prepared if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a Subsequent or Supplemental EIR have occurred.

CEQA Guidelines, Section 15164(b) states that an Addendum to a previously adopted Mitigated Negative Declaration may be prepared if only minor technical changes or additions are necessary.

If the factors listed in CEQA Guidelines Sections 15162, 15163, or 15164 have not occurred or are not met, no changes to the previously certified EIR or previously adopted MND are necessary.

The following responses detail any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that may cause one or more effects to environmental resources. The responses support the "Determination," above, as to the type of environmental documentation required, if any.

ENVIRONMENTAL REVIEW UPDATE CHECKLIST

I. AESTHETICS – Since the previous EIR was certified or previous MND was adopted, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause one or more effects to aesthetic resources including: cause a substantial adverse effect on scenic vistas; cause substantial damage to scenic resources including, but not limited to, trees, rock outcroppings, or historic buildings within a state scenic highway; substantially degrade the existing visual character or quality of public views of the site and its surroundings; or create new sources of substantial light or glare, which would adversely affect day or nighttime views in the area?

YES	NO
☐	☒

The 2017 IS/MND concluded that less-than-significant impacts to scenic resources or aesthetics would occur.

The proposed project differs from the previous project because the project footprint has been reduced from 14 acres in 2017 to 7.86 acres currently. Furthermore, as detailed in Table 2, the proposed project would include the construction of 100 affordable senior housing units, a senior center, a PACE Wellness Center, and a public park area, and would no longer include the previously proposed community gymnasium and teen café, childcare center, and community support center. The proposed project would include an approximately 77,500 sf two-story residential building (which would include a 1,800 sf senior center) as well as a single-story building consisting of an approximately 5,000 sf PACE Wellness Center. Similar to the 2017 project, open space and recreational uses would be located in the northern portion of the project site.

The project site is approximately 0.25 mile southwest of State Route (SR) 78 and approximately 0.13-mile north of SR 67 (Main Street), both identified as scenic highways in the County's Scenic Highway Element. A Visual Study and associated visual simulations were prepared showing pre- and post-project views of the project site from both County scenic routes, as detailed in Appendix B, Visual Study (County of San Diego 2023). The visual simulations show viewpoints of the project site from various angles, including from the intersections of Main Street and 12th Street looking west (Key View 1), Main Street and 13th Street looking north (Key View 2), SR-78 and A Street looking west (Key View 3), and SR-78 and B Street looking west (Key View 4). As shown in the visual simulations, intermittent views of the project site would be visible from the intersection of Main Street and 12th Street (Key View 1); however, the proposed project would be neutral toned and remain generally consistent with the mass and scale of the surrounding commercial uses. As shown in the visual simulations, existing vegetation and existing surrounding buildings (including the Ramona Library) would continue to be the dominant view along both County scenic highways. The proposed project would not block views of the surrounding mountains and project design would be compatible with the existing environment's

visual character and quality, consistent with the project analyzed in the 2017 IS/MND. The proposed project would therefore not degrade the existing visual character or quality of the area, including from identified scenic highways.

The project site is in Zone B as identified by the San Diego County Light Pollution Code and located approximately 22 miles south of the Palomar Observatory. The project site is located in the downtown center of Ramona, where existing development contributes a substantial amount of light that affects nighttime views. Existing sources of lighting in the immediate vicinity of the proposed project include streetlights, and lighting from commercial and industrial buildings. The proposed project would introduce new sources of light, including lighting on the exterior of the proposed buildings and in the parking area. However, similarly to the previous project, the proposed project would not adversely affect nighttime views or astronomical observations because the proposed project would conform to the Light Pollution Code (LPC) (Section 51.201-51.209), including the Zone B lamp type and shielding requirements per fixture and hours of operation limitations for outdoor lighting and searchlights. Therefore, the proposed project would result in a less-than-significant impact on aesthetic resources, consistent with the 2017 IS/MND.

II. AGRICULTURE AND FORESTRY RESOURCES – Since the previous EIR was certified or previous MND was adopted, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause one or more effects to agriculture or forestry resources including: conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to a non-agricultural use, conflicts with existing zoning for agricultural use or Williamson Act contract; conversion 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)); loss of forest land or conversion of forest land to non-forest use; or involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?

YES	NO
☐	☒

The 2017 IS/MND concluded no impacts related to agriculture and forestry resources would occur.

The proposed project differs from the previous project because the project footprint has been reduced from 14 acres in 2017 to 7.86 acres currently. Furthermore, as detailed in Table 2, the proposed project would include the construction of 100 affordable senior housing units, a senior center, a PACE Wellness Center, and a public park area, and would no longer include the previously proposed community gymnasium and teen café, childcare center, and community support center. As stated in the 2017 IS/MND, the project site does not contain any agricultural resources, lands designated as Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency. According to the Phase I Environmental Site Assessment (ESA) prepared for the proposed project in 2019, aerial photographs identified potential agricultural use on the project site between 1953 and 1968 which may have included ranching or dry farming. However, the land has been vacant since 1971, and no longer contains any agricultural uses or ranching activities (AEC 2019). Furthermore, since the approval of the 2017 project, no changes to a Williamson Act Contract

have occurred. The project site is zoned V4 General District, which allows for community recreation and other civic amenities. The northern portion of the project site is zoned as V2 Rural District and V1 Natural District around the Santa Maria Creek. Both zones permit community recreation uses, which is consistent with agricultural uses. Therefore, the proposed project would result in no impacts to agricultural resources or forestry resources, including the conversion of land to non-agricultural use, consistent with the 2017 IS/MND.

III. AIR QUALITY – Since the previous EIR was certified or previous MND was adopted, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause one or more effects to air quality including: conflicts with or obstruction of implementation of the San Diego Regional Air Quality Strategy (RAQS) or applicable portions of the State Implementation Plan (SIP); results 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; exposure of sensitive receptors to substantial pollutant concentrations; or results in other emissions, such as those leading to odors, adversely affecting a substantial number of people?

YES	NO
☐	☒

The 2017 IS/MND concluded less-than-significant impacts related to violation of air quality standards, impacts to sensitive receptors, and exposure to objectionable odors. The 2017 project was determined to be consistent with the County's General Plan, site zoning, and land use projections within the RAQS and SIP.

The proposed project differs from the previous project because the project footprint has been reduced from 14 acres in 2017 to 7.86 acres currently. Furthermore, as detailed in Table 2, the proposed project would include the construction of 100 affordable senior housing units, a senior center, a PACE Wellness Center, and a public park area, and would no longer include the previously proposed community gymnasium and teen café, childcare center, and community support center.

Construction Emissions

Proposed project construction was assumed to take approximately 23 months. Table 1, *Construction Phases and Equipment*, summarizes the expected construction schedule and number of pieces of equipment. The proposed project would export approximately 500 cubic yards of soil and import 5,500 cubic yards of soil during the grading/excavation phase, with the remaining soil to be balanced on-site. Emissions from project construction activities were estimated based on the construction phase in which the activity would be occurring. Daily truck trips and default trip length data were used to assess roadway emissions from truck exhaust. The maximum daily emissions are estimated values for the worst-case day and do not represent the emissions that would occur for every day of construction of the proposed project. The maximum daily emissions are compared to the San Diego County Air Pollution Control District (SDAPCD) daily regional numeric indicators. Detailed construction equipment lists, construction scheduling, and emissions calculations are provided in the Air Quality Technical Report (Appendix C).

The proposed project construction and operational criteria air pollutant emissions are estimated using the California Emissions Estimator Model (CalEEMod) (version 2022.1.1) software, an emissions inventory software, which is a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professions to quantify potential criteria pollutant and greenhouse (GHG) emissions from a variety of land use projects. CalEEMod was developed in collaboration with the air districts of California. Regional data (e.g., emission factors, trip lengths, meteorology, source inventory) have been provided by the various California air districts to account for local requirements and conditions. The model is an accurate and comprehensive tool for quantifying air quality and GHG impacts from land use projects throughout California and is recommended by the SDAPCD and County of San Diego for construction emission calculations. Emissions from on-road vehicles were estimated outside of CalEEMod using emission factors from the California Air Resources Board (CARB) On Road Vehicle Emissions Factor Model version 2021 (EMFAC2021) for haul and material vendor trucks and worker vehicles.

Grading activities associated with construction of the proposed project would be subject to County of San Diego Grading Ordinance, which requires the implementation of dust control measures and SDAPCD Rule 55. SDAPCD Rule 55 requires the implementation of dust control measures such as application of water to graded/exposed surfaces and during loading/unloading activities, wheel-washing or other means to minimize track out dust on vehicles entering/leaving the project site, stabilization of dirt piles, and hydroseeding of graded areas to minimize dust emissions from exposed surfaces. The proposed project would be required to water the site three times daily and replace ground cover in disturbed areas when they become inactive. Consistent with SDAPCD Rule 67.0.1, nonresidential interior paint would not exceed flat coating limits (i.e., 50 grams per liter [g/L] VOC), exterior paint would not exceed non-flat coating limits (i.e., 50 g/L VOC), and a small portion of exterior trim paint and other minor paint finishes would not exceed non-flat high-gloss coating limits (i.e., 50 g/L VOC). Consistent with SDAPCD Rule 67.0.1, the project would use architectural coatings with a VOC content of 50 g/L or less for exterior coatings and 50 g/L or less for interior coatings. Coatings for parking areas would use architectural coatings with a VOC content of 100 g/L or less. Consistent with County of San Diego PDS requirements and the 2017 IS/MND, all construction equipment would meet United States Environmental Protection Agency (USEPA) Tier 3 emissions standards.

Table 3*, Estimated Regional Construction Emissions,* presents the maximum daily criteria air pollutant and precursor emissions resulting from the construction of the project (Appendix C, Air Quality Technical Report).

Table 3
Estimated Regional Construction Emissions (pounds per day)[a]

Source	VOC	NO_X	CO	SO_2	PM_{10} [b]	$PM_{2.5}$ [b]
Site Preparation – 2024	<1	24.0	28.9	<1	8.8	4.8
Grading – 2024	<1	18.6	20.8	<1	4.2	2.1
Building Construction – 2024	1.3	14.9	23.7	<1	2.8	1.1
Building Construction – 2025	1.2	14.7	23.2	<1	2.8	1.1
Paving – 2025	<1	8.7	11.2	<1	<1	<1
Architectural Coating – 2025	4.1	1.6	2.7	<1	<1	<1
Overlapping Phases						
Building Construction + Paving + Architectural Coating - 2025	1.7	23.6	34.9	<1	3.3	1.5
Building Construction + Paving 2025	5.8	25.1	37.1	<1	3.8	1.6
Maximum Daily Emissions	**5.8**	**25.1**	**37.1**	**<1**	**8.8**	**4.8**
County Screening-Level Threshold	137	250	550	250	100	55
Exceeds Thresholds?	No	No	No	No	No	No

NOTES:

[a] Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix C.

[b] Emissions include fugitive dust control measures consistent with South Coast Air Quality Management District Rule 403.

[c] Modeling for project construction is estimated to start in winter 2024, but may commence at a later date. If this occurs, construction impacts would be lower than those analyzed here due to the use of a more energy-efficient and cleaner burning construction vehicle fleet mix, pursuant to state regulations that require vehicle fleet operators to phase in less polluting heavy- duty equipment. As a result, should Project construction commence at a later date than analyzed in this analysis, air quality impacts would be lower than the impacts disclosed herein.

SOURCE: ESA, 2023.

Operational Emissions

The proposed project's operational emissions are estimated using CalEEMod version 2022.1.1. CalEEMod was used to forecast the daily regional emissions from area sources that would occur during long-term operation of the proposed project. For transportation-related emissions, a 2015 Air Quality Technical Report was prepared for the previous project in support of the 2017 IS/MND. The 2015 air quality technical report prepared for the previous project calculated a total annual vehicle miles travelled of 3,807,278 miles. Comparatively, the proposed project would result in 2,422,909 total annual miles, which is considerably fewer miles than evaluated in the 2017 IS/MND and associated 2015 air quality technical report (see Section XVII. Transportation). Similar to construction, operational emissions from on-road vehicles were estimated outside of CalEEMod using the CARBEMFAC2021 model. All vehicle types would visit the project site. Therefore, this assessment uses the San Diego Air Basin's motor vehicle fleet mix and the fleet average calendar year emissions factors from EMFAC2021 to estimate mobile source operational emissions for the buildout year of 2025.

Area source emissions are based on landscaping equipment and consumer product usage (including paints) rates provided in CalEEMod. The project would implement similar low-flow faucets, toilets, and showers and water-efficient irrigation system as assumed in the 2017 IS/MND. Solid waste diversion is assumed to be 60 percent as the County achieved 60 percent waste diversion in the unincorporated areas as of 2018. Operational emissions are considered to be all net new emissions as the existing site is vacant. **Table 4***, Estimated Regional Operational Emissions,* presents the maximum daily and annual criteria air pollutant and precursor emissions resulting from the operation of the proposed project (Appendix C, Air Quality Technical Report).

Table 4
Estimated Regional Operational Emissions (pounds per day)[a]

Source	VOC	NO_X	CO	SO_2	PM_{10}	$PM_{2.5}$
Area (Architectural Coating, Consumer Products Usage, Landscaping)	2.47	0.06	5.96	<1	<1	<1
Energy	0	0	0	0	0	0
Mobile	2.60	2.39	22.50	0.05	4.73	1.23
Total Regional Emissions	5	2	28	<1	5	1
County Screening-Level Threshold	137	250	550	250	100	55
Exceeds Thresholds?	No	No	No	No	No	No

NOTE:

[a] Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix C.

SOURCE: ESA, 2023.

The County has established screening level thresholds (SLTs) to assist lead agencies in determining the significance of project-level regional air quality impacts within the county. The SLTs are based on SDAPCD's Regulation II, Rules 20.2 and 20.3 (new source review for non-major and major stationary sources, respectively), which outline Air Quality Impact Analysis (AQIA) Trigger Levels for regional criteria pollutants for new or modified sources under the New Source Review (NSR) program. The SLTs provide quantitative metrics to determine whether a project's emissions above the STLs would result a significant impact to air quality for CEQA purposes. Refer to the Air Quality Technical Report (Appendix C) for additional information regarding the SLTs. As shown in Tables 3 and 4, project construction and operational criteria air pollutant and precursor emissions would not exceed the County's SLTs for any criteria air pollutants or ozone precursors. Therefore, the proposed project would have less-than-significant impacts construction and operational criteria air pollutant emissions quality, consistent with the 2017 IS/MND.

Consistency with Plans

The proposed project would be consistent with the applicable General Plan and therefore would be also consistent with the RAQS and the SIP. If a proposed development exceeds the growth projections, it would have a potentially significant impact on air quality. Currently, the project site is designated as General Commercial, High Impact Industrial, and Rural Lands (RL-20). Prior to the County's purchase of the project site, Housing and Community Development Services worked with County partners and consultants to conduct a market study and due diligence land use analysis to evaluate the potential uses of the site and to determine the market conditions in the community. These studies concluded that there is strong demand for affordable senior housing in Ramona. As described in the Project Description, the proposed project would be compatible with the existing General Plan designations and zoning upon approval of a minor use permit (ZAP). The proposed project would consist of approximately 100 affordable senior residential units, which would include 85 one-bedroom units and 15 two-bedroom units. Therefore, the proposed project would conform to planned growth that is anticipated by the General Plan and result in compliance with state and local housing regulations and would be consistent with the population growth projections for the area. As SANDAG does not have local land use or regulatory authority, the project's consistency with the County of San Diego General

Plan would be sufficient to determine that the proposed project would not conflict with SANDAG growth projections and the RAQS.

Additionally, the proposed project would comply with CARB regulatory requirements to minimize short-term emissions from on-road and off-road diesel construction equipment (i.e., Title 13 California Code of Regulations [13 CCR], Section 2485 – anti-idling regulation; 13 CCR, Section 2025 – Truck and Bus regulation to reduce NO_X, PM10, and PM2.5 emissions; and 13 CCR, Section 2449 – In-Use Off-Road Diesel Fueled Fleets regulation to reduce NO_X, PM10, and PM2.5 emissions). In accordance with County of San Diego Planning and Development Services requirements, the project would require the construction contractor to use a minimum of Tier 3 equipment, which would reduce exhaust NOx, PM10, and PM2.5 emissions from construction equipment. The proposed project would also comply with SDAPCD regulations for controlling fugitive dust pursuant to SDAPCD Rule 55 - Fugitive Dust and SDAPCD Rule 67.0.1 for controlling VOC emissions from the application of architectural coatings.

Compliance with these requirements is consistent with and meets the RAQS requirements for control measures intended to reduce emissions from construction equipment and activities. Therefore, the proposed project would not conflict with or obstruct implementation of the RAQS, and impacts would be less than significant, consistent with the 2017 IS/MND.

Sensitive Receptors

Construction

Health risk was calculated for the off-site residential receptors within approximately 1,000 feet of the proposed project site to capture maximum risk impacts. The health risk assessment includes the County of San Diego Planning and Development Services requirement for the project to utilize a construction contractor with equipment that achieves a minimum of the Tier 3 emissions standards, which would reduce exhaust diesel particulate matter emissions (i.e., exhaust PM10 and PM2.5 emissions). AERMOD was used to quantify concentrations at the off-site receptors. Health risk calculations were performed using a spreadsheet tool consistent with OEHHA guidance. The spreadsheet tool incorporates the algorithms, equations, and a variable described above, as well as in the OEHHA guidance, and incorporates the results of the AERMOD dispersion model. The proposed project's detailed health risk assessment is included as Appendix B of the Air Quality Technical Report (Appendix C of this checklist).

The maximum unmitigated incremental increase in cancer risk at the maximum impacted sensitive receptor would be up to approximately 3.8 in one million. The maximum risk would occur at the residential receptors located to the southeast of the project site and would not exceed the significance threshold of 10 in one million. Thus, the cancer risk for nearby sensitive receptors would be less than significant.

The chronic noncancer health impacts from construction of the proposed project would be approximately 0.008 for the maximum impacted sensitive receptor, which would be well below the significance threshold of 1.0. The maximum impacted receptors would be the residential receptors located to the southeast of the project site. Thus, the chronic noncancer health risk for nearby sensitive receptors would be less than significant, consistent with the 2017 IS/MND.

Operation

The proposed project would not generate or attract substantial numbers of delivery trucks and service vehicles (i.e., more than 100 trucks per day or more than 40 trucks with operating transport refrigeration units per day). Project-related trucks that would visit the site would be required to comply with the applicable provisions of the CARB Truck and Bus regulation (13 CCR, Section 2025) and the CARB anti-idling regulation (13 CCR, Section 2485), which would minimize PM and NO_X emissions from diesel trucks. Therefore, project operations would not be a substantial source of diesel particulates. Furthermore, TAC emissions from periodic maintenance operations are expected to be sporadic and intermittent, which is typical of residential uses, and would result in minimal exposure to off-site and on-site sensitive receptors. Architectural coatings are regulated via SDAPCD Rule 67.0.1, which places limits on the VOC (some of which may be TACs) content of various coating categories. Thus, operation of the proposed project would not expose sensitive receptors to substantial toxic air contaminant concentrations and operational impacts would be less than significant, consistent with the 2017 IS/MND.

CO Hotspots

There is no localized CO hotspot significance threshold methodology for the SDAPCD. For this reason, this CO hotspot analysis relies on the County of San Diego Guidelines for Determining Significance (County of San Diego 2007a). CO hotspots may potentially occur at signalized intersections that operate at or below Level of Service (LOS)[1] E with peak-hour trips for that intersection exceeding 3,000 trips. The 2015 Traffic Impact Analysis for the Ramona Intergenerational Community Campus project, which was prepared for the 2017 IS/MND, identified one intersection, Main Street and 12th Street, that would operate at LOS E or worse. Based on the traffic projections, the proposed project would generate a total of 567 daily vehicle trips during weekdays and 48 peak hour vehicle trips (see Section XVII. Transportation). The proposed project site is adjacent to Walnut Street, Maple Street/13th Street, and 12th Street and in proximity to Main Street. Walnut Street and Maple Street/13th Street are not thoroughfares and do not carry daily vehicle volumes of more than 10,000 average daily trips, which is generally equivalent to peak hour trips of approximately 1,000 trips or less.[2] Main Street (at 12th Street) carries approximately 25,780 average daily trips while 12th Street (at Main Street) carries approximately 537 average daily trips based on the 2015 Traffic Impact Analysis. Conservatively assuming a 1 percent increase in the daily traffic volume, the segment of Main Street near 12th Street would be estimated to carry approximately 27,916 average daily trips (approximately 2,792 peak hour trips) and the segment of 12th Street near Main Street would be estimated to

[1] Level of service (LOS) is the term used to denote the different operating conditions which occur on a given roadway segment under various traffic volume loads. It is a qualitative measure used to describe a quantitative analysis taking into account factors such as roadway geometries, signal phasing, speed, travel delay, freedom to maneuver, and safety. Level of service provides an index to the operational qualities of a roadway segment or an intersection. Level of service designations range from A to F, with LOS A representing the best operating conditions and LOS F representing the worst operating conditions.

[2] The Federal Highway Administration had a general assumption that peak hour trips represent approximately 10 percent of daily trip volumes (the Federal Highway Administration considers 10 percent to be a standard assumption. See http://www.fhwa.dot.gov/planning/tmip/publications/other_reports/tod_modeling_procedures/ch02.cfm.

carry approximately 581 average daily trips (approximately 58 peak hour trips) in 2023.[3] Based on the project's 48 peak hour vehicle trips, the project would not cause peak-hour trips in excess of 3,000 trips at an intersection that operates at or below LOS E. Therefore, the proposed project would not exceed the County's screening level for CO hotspots and would not contribute considerably to the formation of a CO hotspot. Impacts would be less than significant, consistent with the 2017 IS/MND.

Other Emissions Such as Those Leading to Odors

Construction and long-term operation of the proposed project would not introduce new sources of odors and would not create objectionable odors that could affect nearby sensitive receptors. The proposed project is required to conform to SDAPCD Rule 51 (Public Nuisance), SDAPCD Rule 67.0.1 (VOC limits), and the CARB Air Toxics Control Measure. With respect to other emissions, criteria air pollutant emissions from those pollutants that are in attainment (CO, NO_2, and SO_2) would be less than significant during construction and operation. Therefore, potential odor impacts would be less than significant, consistent with the 2017 IS/MND.

IV. BIOLOGICAL RESOURCES – Since the previous EIR was certified or previous MND was adopted, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause one or more effects to biological resources including: substantial adverse effects, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species or on any riparian habitat or other sensitive natural community identified in a local or regional plan, policy, or regulation, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service; substantial adverse effects on federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means; substantial interference with the movement of any native resident or migratory fish or wildlife species or with wildlife corridors, or impeding the use of native wildlife nursery sites; and/or conflicts with the provisions of any adopted Habitat Conservation Plan, Natural Communities Conservation Plan, or other approved local, regional or state habitat conservation plan, policies or ordinances, such as such as a tree preservation policy or ordinance?

YES	NO
☒	☐

The 2017 IS/MND concluded that impacts to biological resources would be less than significant with implementation of mitigation measures **MM-BIO-1** to reduce impacts related to wetlands/riparian habitat, **MM-BIO-2** to reduce impacts related no non-native grassland habitat, **MM-BIO-3** to reduce impacts to San Diego gumplant, and **MM-BIO-4** to reduce impacts to nesting birds due to construction-related noise. The previous project concluded it would not conflict with the provisions of any adopted Habitat Conservation Plan, Natural Communities Conservation Plan, other approved local, regional or state habitat conservation plan or any other local policies or ordinances that protect biological resources.

[3] The Federal Highway Administration had a general assumption that peak hour trips represent approximately 10 percent of daily trip volumes (the Federal Highway Administration considers 10 percent to be a standard assumption. See http://www.fhwa.dot.gov/planning/tmip/publications/other_reports/tod_modeling_procedures/ch02.cfm.

A Biological Technical Report, dated September 2023, was completed by Environmental Science Associates for the proposed project. The report analyzes the impacts of the proposed project located on APNs 281-182-17 and 281-182-18 and is attached as Appendix D. Ground conditions at the project site have changed since the previous project was analyzed. The 2017 IS/MND mitigation measures have been updated and renumbered to reflect the below analysis for the proposed project.

Special-Status Plants

The Biological Technical Report identified that one special-status plant species, southern tarplant, was observed within the study area during focused surveys in 2021. Approximately 3,206 southern tarplant individuals were observed on-site within a 0.032-acre area in the northern and eastern portions of the study area. Direct counts were estimates, and southern tarplant population size can fluctuate depending on various factors (e.g., natural fluctuations in population size of this annual species, precipitation and drought); thus, impacts were analyzed based on area of the population. The proposed project would avoid approximately 0.027 acre of southern tarplant; however, approximately 0.005 acre of southern tarplant would be directly impacted by the construction activities associated with the proposed project, including direct loss of individuals (Figure 12 in Appendix D). Impacts to southern tarplant would be potentially significant. However, implementation of **MM-BIO-1** would reduce impacts to a less-than-significant level.

Special-Status Wildlife

The Biological Technical Report identified that eight special-status bird species were observed within the study area, including least Bell's vireo (FE, SE, County Group 1), yellow warbler (SSC, County Group 1), Cooper's hawk (State Watch List, County Group 1), red-shouldered hawk (County Group 1), and western bluebird (County Group 2), as well as observations of species flying over the study area, including double-crested cormorant (County Group 2), turkey vulture (County Group 1), and white-tailed kite (State Fully Protected, County Group 1). One special-status reptile species, Belding's orange-throated whiptail (State Watch List, County Group 2), was observed within the study area during previous surveys (Caltrans 2018). Blackhawk Environmental conducted focused fairy shrimp surveys in 2023; no listed fairy shrimp were found. One special-status amphibian species, western spadefoot (SSC, County Group 2), was observed outside of the southern boundary of the study area during the 2023 fairy shrimp surveys conducted by Blackhawk Environmental; however, no impacts would occur to this species, since it does not occur within the project site or surrounding study area. In addition, other special-status species that were not observed but have a moderate potential to occur within the project site due to the presence of suitable habitat included coastal whiptail, vermilion flycatcher, Townsend's big-eared bat, western red bat, Yuma myotis, and western mastiff bat. Special-status wildlife species observed on-site are shown in relation to the project's impact footprint in Figure 13 in Appendix D.

The proposed project was designed to avoid and minimize impacts to sensitive biological resources, including Santa Maria Creek and its associated native riparian habitat, and to provide setback buffers from development for the protection of these resources. The project includes a 150-foot setback from the main channel of Santa Maria Creek and its associated southern cottonwood-willow riparian forest, and a 50-foot setback from the nearest southern willow scrub mapped within the outer floodplains to the south of the main channel of the creek. These areas

provide the highest quality native suitable habitat for the majority of the special-status species observed or that have a moderate potential to occur on-site, including least Bell's vireo, yellow warbler, Cooper's hawk, red-shouldered hawk, western bluebird, white-tailed kite, coastal whiptail, vermilion flycatcher, Townsend's big-eared bat, western red bat, Yuma myotis, and western mastiff bat. Thus, the project would avoid direct impacts (removal of habitat and direct mortality/loss of individuals) to these species and their habitat. The project would directly permanently impact 0.24 acre of salt grass grassland, 0.12 acre of non-native grassland, and 4.81 acres of non-native grassland: broadleaf-dominated within the central and southern portions of the project site, which may be used for additional foraging habitat for special-status bird and bat species that inhabit Santa Maria Creek and its associated native riparian habitat. Impacts to foraging habitat for special-status wildlife species would be potentially significant. Implementation of MM- BIO-7 would reduce impacts below a level of significance, as further detailed below under Sensitive Natural Communities.

Indirect impacts would be minimized by the setback, and special-status wildlife using this habitat are likely already relatively adapted to human activity due to the extensive existing development within the immediate vicinity north and south of the creek. During construction, increased noise levels and human activity would occur. Although these disturbances would be temporary and would be minimized by the setback buffers, indirect impacts to special-status wildlife species would be potentially significant. Implementation of Mitigation Measures **MM-BIO-2**, **MM-BIO-3**, **MM-BIO-4**, and **MM-BIO-5** would avoid or minimize indirect impacts during construction. Avoidance of the breeding seasons and/or preconstruction surveys to confirm if special-status wildlife species are present or if nesting is occurring, establishing species-specific setback buffers, and/or conducting monitoring during construction to confirm no impacts to special-status wildlife species or established nests would be implemented to reduce impacts below a level of significance.

During operation, potential disturbances to wildlife would be similar to those existing uses in the surrounding vicinity where development already occurs to the north and south of Santa Maria Creek. Although the proposed trail is set back from the native riparian habitat, there may be limited disturbance associated with increased human activity from use of the trail. Additionally, the trail would allow for equestrian uses. The introduction of horses, and specifically horse manure, has the potential to attract brown-headed cowbirds (Molothrus ater). Brown-headed cowbirds are known to parasitize the nests of other birds, and this species was documented during the biological surveys. Increased attraction of brown-headed cowbirds could have an adverse effect on special-status bird species, such as the least Bell's vireo (FE, SE). Thus, indirect impacts to special-status wildlife would be potentially significant. However, implementation of **MM-BIO-6** would reduce impacts to a less-than-significant level.

Double-crested cormorant and turkey vulture were observed flying over the project site, but are not expected to nest on-site due to lack of suitable nesting habitat, and impacts to these species as a result of the project would be less than significant.

Sensitive Natural Communities

The Biological Technical Report found that two sensitive natural communities occur within the study area: southern cottonwood-willow riparian forest and southern willow scrub. In addition, per the County's Guidelines for Determining Significance for Biological Resources, wetland and

riparian habitats (including emergent wetland, southern cottonwood-willow riparian forest and southern willow scrub), salt grass grassland (i.e., native grassland), and Diegan coastal sage scrub are sensitive habitats, and non-native grassland is a naturalized habitat which if impacted, require mitigation at specified replacement ratios. Disturbed habitat under the County's Guidelines for Determining Significance for Biological Resources is not considered sensitive and does not require mitigation for impacts to this habitat. As the North County Multiple Species Conservation Program (NCMSCP) is not yet approved, the project follows the County's Guidelines for Determining Significance for Biological Resources (San Diego County 2010).

The proposed project was designed to avoid and minimize impacts to sensitive biological resources, specifically including these sensitive natural communities, and to provide setback buffers from development for the protection of these resources. The proposed project completely avoids impacts to the southern cottonwood-willow riparian forest, disturbed emergent wetland, and Diegan coastal sage scrub communities on-site. However, the proposed project would permanently impact 0.24 acre of salt grass grassland and a small 0.02-acre patch of southern willow scrub within the eastern portion of the project site (as summarized in Table 3 of Appendix D and shown in Figure 14 of Appendix D). The majority of the southern willow scrub community that will be impacted occurs within an off-site portion of the study area (i.e., within the 100-foot buffer) on fenced private property which was not accessed during the surveys; however, a small portion of this vegetation community overhangs onto the project site, which would be impacted by the proposed project. Additionally, the project would permanently impact two naturalized communities, including 0.12 acre of non-native grassland and 4.81 acres of non-native grassland: broadleaf-dominated, within the southern portion of the project site. Impacts to salt grass grassland, southern willow scrub, non-native grassland, and non-native grassland: broadleaf-dominated would be potentially significant. However, implementation of **MM-BIO-7** would reduce impacts to a less-than-significant level.

CDFW Riparian Habitat

CDFW jurisdiction on-site includes Santa Maria Creek, associated riparian vegetation, the disturbed emergent wetland, the bio swale, and Culvert 1, which supports 3.538 acres of potential CDFW resources regulated under FGC Section 1600.

The proposed project is designed to avoid and minimize impacts to riparian habitat and to provide setback buffers from development for the protection of these resources. However, the proposed project would permanently impact a 0.02-acre patch of southern willow scrub within the eastern portion of the project site, which is potentially subject to CDFW jurisdiction (Figure 15 in Appendix D). Although the majority of the community occurs within an off-site portion of the study area (i.e., within the 100-foot buffer) on fenced private property which was not accessed during the surveys, a small portion of this vegetation community overhangs onto the project site, which would be impacted during construction of the proposed project. It is not anticipated that roots of riparian vegetation would be impacted (i.e., since the vegetation is rooted on the adjacent property), but trimming would likely occur. Impacts to southern willow scrub would be potentially significant. However, implementation of **MM-BIO-7** would reduce impacts to a less-than-significant level.

Jurisdictional Waters

USACE jurisdiction on-site includes Santa Maria Creek, which supports 0.178 acre of potentially jurisdictional federal waters of the U.S. RWQCB jurisdiction on-site includes Santa Maria Creek, the disturbed emergent wetland, the bio swale, and Culvert 1, which supports 0.607 acre of potential waters of the State. However, it should be noted that it is unlikely that the RWQCB would take jurisdiction over the disturbed emergent wetland and bio swale as those are constructed features to improve water quality per the County's National Pollutant Discharge Elimination System (NPDES) permit.

The proposed project would not impact USACE jurisdictional waters of the U.S. or wetlands, or RWQCB jurisdictional waters of the State or wetlands. Therefore, no impacts would occur to protected wetlands and no mitigation is required.

Regional Wildlife Movement

The study area supports live-in and movement habitat for species on a local scale, and Santa Maria Creek and its associated native riparian habitat likely functions to facilitate regional wildlife movement. The proposed project is designed to avoid and minimize impacts to sensitive biological resources, specifically including Santa Maria Creek and its associated native riparian habitat, and to provide setback buffers from development for the protection of these resources. The proposed project includes a 150-foot setback from the main channel of Santa Maria Creek and its associated southern cottonwood-willow riparian forest, and a 50-foot setback from the nearest southern willow scrub mapped within the outer floodplains to the south of the main channel of the creek. Therefore, there would be no direct impacts to the Santa Maria Creek regional wildlife movement corridor.

Indirect impacts would be minimized by the setback, and wildlife using this habitat for regional movement are likely already relatively adapted to human activity due to the extensive existing development within the immediate vicinity north and south of the creek. During construction, noise and human activity would potentially increase; however, these disturbances would be temporary, would comply with the requirements of local noise and lighting ordinances, and would not inhibit long-term regional wildlife movement. During operation, potential disturbances to wildlife would be similar to those existing uses in the surrounding vicinity where development already occurs to the north and south of Santa Maria Creek. Although the proposed trail is setback from the native riparian habitat, there may be limited disturbance associated with increased human activity from use of the trail. Therefore, indirect impacts to regional wildlife movement would be potentially significant. However, implementation of **MM-BIO-8** would reduce impacts to a less-than-significant level.

Nesting Birds and Native Wildlife Nursery Sites

The project site supports trees and shrubs that provide habitat suitable for bird nesting. The removal of vegetation during the breeding season for construction of the proposed project may result in the disturbance of nesting birds (passerine and raptors) protected by the Migratory Bird Treaty Act (MBTA) and FGC Sections 3503, 3503.5, and 3513. Impacts to nesting birds would be potentially significant. However, implementation of **MM-BIO-3** would reduce impacts to a less-than-significant level.

If present on-site, roosting bats would inhabit the riparian woodland habitat which will be avoided by the proposed project, and no direct impacts would occur. Indirect impacts to roosting bats during construction activities would be temporary on an intermittent basis. If present on-site, the roosting bat species are already adapted to living in an urbanized setting with the existing night lighting in the vicinity from the adjacent developed areas and traffic along roads. Although portions of the project site would include new lighting, these areas do not contain vegetation or have suitable habitat for roosting bat species, and lighting would be directed away from habitat areas. The incremental addition of noise would be similar to existing conditions, and a change in the on-site operational noise levels and associated human activities would be low and would not diminish wildlife use by roosting bat species that are already adapted to living in an urbanized setting. Additionally, **MM-BIO-4** is included to address potential indirect impacts to special-status bats to a less-than-significant level if construction cannot avoid the maternity roosting season. Therefore, indirect impacts from lighting, noise, and human activity during project operation would not diminish long-term survival of roosting bat species, and therefore would not be significant.

Local Policies and Ordinances

The San Diego County Code of Regulatory Ordinances, including the RPO, restrict to varying degrees impacts to various natural resources including wetlands, wetland buffers, floodplains, steep slopes, sensitive habitat lands and historical sites.

The proposed project is designed to avoid and minimize impacts to sensitive biological resources, including Santa Maria Creek and its associated native riparian habitat, and to provide setback buffers from development for the protection of these resources. The proposed project includes a 150-foot setback from the main channel of Santa Maria Creek and its associated southern cottonwood-willow riparian forest, and a 50-foot setback from the nearest southern willow scrub mapped within the outer floodplains to the south of the main channel of the creek. The proposed project would avoid impacts to wetlands, including the disturbed emergent wetland mapped in the southwest portion of the project site. The proposed project also includes a 50-foot setback from the disturbed emergent wetland. Although this area supports hydrophytes that qualify it to be a wetland, it is a human-made retention basin that is disturbed and dominated by non-native grasses and non-native forbs, and has highly disturbed soils that contain construction debris (e.g., concrete, asphalt); thus, a smaller 50-foot buffer was determined appropriate based on County guidelines (County of San Diego 2010). The project will impact a small 0.02-acre patch of southern willow scrub within the eastern portion of the project site. The majority of the southern willow scrub community that will be impacted occurs within an off-site portion of the study area (i.e., within the 100-foot buffer) on fenced private property which was not accessed during the surveys; however, a small portion of this vegetation community overhangs onto the project site, which would be impacted by the proposed project. Although soil pits were not taken at this location due to inaccessibility of the drainage feature on the adjacent fenced property, for purposes of this analysis, it is assumed that this area could be a wetland but would not be considered a RPO wetland because it exists solely due to a human-made structure, has negligible biological function or value as wetlands, is small and geographically isolated from other wetland systems. Additionally, it is not a vernal pool, and does not have substantial or locally important populations of wetland dependent sensitive species as defined in the San Diego County Code of Regulatory Ordinance Chapter 6 Section 86.601 subsections (q)(2)(aa)(i-iv). Thus, the project would not conflict with the RPO and impacts would be less than significant.

The proposed project would limit uses adjacent to the Santa Maria Creek floodway to the low-intensity recreational trail use, which would not substantially harm the environmental values of the floodway area.

Per the RPO, impacts to sensitive habitat lands are prohibited unless all feasible measures necessary to protect and preserve the sensitive habitat lands are required as a condition of permit approval and where mitigation provides an equal or greater benefit to the affected species. Sensitive habitat lands include unique vegetation communities and/or habitat that is either necessary to support a viable sensitive species population, is critical to the proper functioning of a balanced natural ecosystem, or which serves as a functioning wildlife corridor. As previously stated, the proposed project would avoid impacts to Santa Maria Creek and its associated native riparian habitat, which is a regional wildlife corridor. The proposed project also provides setback buffers from development for the protection of these resources. The proposed project would impact a portion of the southern tarplant population found on-site, which could potentially conflict with the RPO and be a potentially significant impact; however, implementation of **MM-BIO-1** would reduce impacts to a less-than-significant level.

Approved Local, Regional, or State Habitat Conservation Plans

Although not yet formally adopted, the study area is located within the Draft NCMSCP (County of San Diego 2009). The proposed project falls within the NCMSCP area but outside of the Pre-Approved Mitigation Areas (PAMAs). However, since the NCMSCP is not yet approved, the project follows the County's Guidelines for Determining Significance for Biological Resources.

The proposed project is designed to avoid and minimize impacts to sensitive biological resources, specifically including Santa Maria Creek and its associated native riparian habitat, including sensitive natural communities, which comprise the regional wildlife movement corridor, and to provide setback buffers from development for the protection of these resources. The proposed project would avoid impacts to the regional wildlife movement corridor, and to the southern cottonwood-willow riparian forest, disturbed emergent wetland, and Diegan coastal sage scrub communities on-site. However, the proposed project would permanently impact 0.24 acre of salt grass grassland and a 0.02-acre patch of southern willow scrub within the eastern portion of the project site. The majority of the southern willow scrub community that will be impacted occurs within an off-site portion of the study area (i.e., within the 100-foot buffer) on fenced private property which was not accessed during the surveys; however, a small portion of this vegetation community overhangs onto the project site, which would be impacted by the proposed project. Impacts to salt grass grassland and southern willow scrub would conflict with the NCMSCP and be potentially significant. However, implementation of **MM-BIO-3** would reduce impacts to a less-than-significant level.

The following are summaries of mitigation measures that will be conditions of the project that would reduce the potential project impacts to biological resources discussed above to less than significant:

Mitigation for Potentially Significant Impacts to Special-Status Plants

MM-BIO-1: Prior to issuance of a grading permit, a southern tarplant mitigation plan shall be prepared by the applicant and submitted to the County detailing the replacement of southern tarplant removed at a 2:1 ratio based on approximate numbers of individuals and/or based on

acreage with similar density as the existing population. The southern tarplant mitigation shall be planted on-site adjacent to and contiguous with native habitat associated with Santa Maria Creek that will be avoided by the project, and the locations shall be to the satisfaction of the County. The southern tarplant mitigation plan shall detail performance standards, maintenance, and future monitoring, and at a minimum, shall include the following:

1. During the spring/summer prior to construction, a qualified biologist/botanist familiar with southern tarplant shall update the map of the southern tarplant individuals on-site. Southern tarplant typically blooms from May through November, so may be easiest to identify within the blooming period for this species.
2. For southern tarplant within the project construction footprint that will be impacted, seed shall be collected during the appropriate season (e.g., summer/fall). Seed may also be collected from southern tarplant populations/individuals on-site that will be avoided by the project, but seed collection should be limited to only 10 percent of seeds available from these populations/individuals so as not to deplete seed source for those avoided populations. Any seeds collected shall be stored in brown paper bags in a cool location until they have fully dried out and the seeds dehised.
3. Prior to construction activities, a qualified biologist/botanist shall flag all populations of southern tarplant to be avoided by the project (e.g., with orange snow fencing, stakes, flagging, or similar materials to clearly demarcate the area to be avoided), and construction crews shall be made aware of the locations of the sensitive biological resources and provided a map which identifies these areas.
4. Within the mitigation receptor site, the salvaged southern tarplant seeds shall be broadcast by hand during the next appropriate growing season. The seeds shall not be stored longer than two years as the viability of the seed dramatically drops off after one year. Planting shall ideally occur prior to the rainy season.
5. The southern tarplant mitigation area shall be monitored by a qualified biologist for three years to verify that southern tarplant has been successfully restored.

Mitigation for Potentially Significant Impacts to Special-Status Wildlife and Nesting Birds

MM-BIO-2: Impacts to least Bell's vireo would be avoided by conducting construction outside of the bird nesting season (i.e., work should occur September 16 to March 14). If construction cannot avoid the least Bell's vireo nesting season, the following measures would be implemented:

1. Prior to construction activities during the least Bell's vireo nesting season (March 15 to September 15), a qualified biologist should conduct three pre-construction surveys of all suitable habitat for the presence of least Bell's vireo. If no least Bell's vireos are found, then no further mitigation is required with concurrence from the County and Wildlife Agencies.
2. If a least Bell's vireo is found during the pre-construction surveys, a buffer of 500 feet around the least Bell's vireo territory, or as determined appropriate by the qualified biologist (based on species-specific tolerances and site-specific conditions), would be delineated, flagged, and avoided until the nesting cycle is complete (i.e., the qualified biologist determines that the young have fledged or the nest has failed). The qualified biologist shall be a person familiar with least Bell's vireo breeding behavior and capable of identifying the species by sight and sound and determining alterations of behavior as

a result of human interaction. Buffers shall be based on local topography and line of sight, species behavior and tolerance to disturbance, and existing disturbance levels, as determined appropriate by the qualified biologist. The qualified biologist may also recommend other measures to minimize disturbances to the territory/nest, which may include, but are not limited to, erection of sound barriers (e.g., noise blankets), erection of visual barriers (e.g., hay bales), or full-time monitoring by a qualified biologist. A biological monitor shall be on-site during construction to confirm the buffers are adequate to avoid and minimize disturbance to least Bell's vireo. Any buffers less than 500 feet, or any additional measures recommended to minimize disturbances should be communicated to the USFWS and CDFW prior to implementation.

MM-BIO-3: Impacts to special-status birds and other nesting birds would be avoided by conducting construction outside of the bird nesting season (i.e., work should occur September 16 to February 14, or July 16 to January 14 for raptors). If construction cannot avoid the bird nesting season, the following measures would be implemented:

1. Prior to work during the bird nesting season (February 15 to September 15, or January 15 to July 15 for raptors), a qualified biologist should conduct a pre-construction survey of all suitable habitat for the presence of nesting birds no more than 3 days prior to construction activities. The results of the pre-construction survey would be valid for 3 days; if vegetation removal activities do not commence within 3 days following the survey, a new pre-construction nesting bird survey should be conducted before these activities begin again. If no active nests are found, then no further mitigation is required with concurrence from the County and Wildlife Agencies.
2. If any active nests are found during a pre-construction nesting bird survey, a buffer of 300 feet (500 feet for raptors), or as determined appropriate by the qualified biologist (based on species-specific tolerances and site-specific conditions), would be delineated, flagged, and avoided until the nesting cycle is complete (i.e., the qualified biologist determines that the young have fledged or the nest has failed). The qualified biologist shall be a person familiar with bird breeding behavior and capable of identifying the bird species of San Diego County by sight and sound and determining alterations of behavior as a result of human interaction. Buffers shall be based on local topography and line of sight, species behavior and tolerance to disturbance, and existing disturbance levels, as determined appropriate by the qualified biologist. The qualified biologist may also recommend other measures to minimize disturbances to the nest, which may include, but are not limited to, erection of sound barriers (e.g., noise blankets), erection of visual barriers (e.g., hay bales), or full-time monitoring by a qualified biologist. A biological monitor shall be on-site during construction to confirm the buffers are adequate to avoid and minimize disturbance to nests.

MM-BIO-4: Impacts to special-status bats would be avoided by conducting all construction outside of the maternity roosting season (i.e., work should occur November 1 to February 28). If construction cannot avoid the maternity roosting season, the following measures would be implemented:

1. Prior to construction during the maternity roosting season (March 1 through September 30), a qualified biologist experienced with bat roost biology should conduct a pre-construction survey of all suitable habitat for the presence of special-status bats. The surveys shall be conducted at dusk and after nightfall by a biologist using sonic bat detectors (e.g., Anabat or Sonobat). If an active roost site is located during the pre-

construction survey, the roost shall be avoided and project activities shall be conducted as recommended by the biologist to avoid the area, which may include provision of a suitable buffer established around the maternity roost until roosting activities cease, or temporary postponement of construction activities. A biological monitor shall be on-site during construction to confirm the buffers are adequate to avoid and minimize disturbance to maternity roosts.

MM-BIO-5: No more than 7 days prior to construction activities, a qualified biologist shall conduct a pre-construction survey of all suitable habitat for the presence of special-status wildlife, including reptiles. A Worker Environmental Awareness Program (WEAP) training shall be provided by a qualified biologist to the construction crews immediately prior to construction, and Best Management Practices (BMPs) (such as limiting vehicle speed, covering trenched areas, and allowing wildlife to leave the work area unharmed) shall be implemented during construction activities to avoid and minimize potential impacts to these species.

MM-BIO-6: Prior to issuance of a grading permit, a manure management plan shall be prepared by the applicant and submitted to the County detailing the maintenance and management of the trail to deter attracting brown-headed cowbirds into the area. The Department of Parks and Recreation shall be responsible for implementing the manure management plan.

Mitigation for Potentially Significant Impacts to Sensitive Plant Communities and Naturalized Communities

MM-BIO-7: Prior to issuance of a grading permit, impacts to sensitive natural communities and naturalized communities will be mitigated by the replacement of an equivalent acreage of salt grass grassland removed, at a 3:1 ratio; southern willow scrub removed, at a 3:1 ratio; and non-native grassland and non-native grassland: broadleaf-dominated removed, at a 0.5:1 ratio. Per the County's Guidelines for Determining Significance and Report Format and Content Guidelines, mitigation may occur offsite at appropriate locations or on-site if the site is appropriate as open space and site-specific factors dictate mitigation would be biologically viable. Mitigation may consist of 1) deducting and/or purchasing credits at a County-approved conservation or mitigation bank, and/or 2) preparing a revegetation plan to be reviewed and approved by the County (and agencies for aquatic resources) that identifies disturbed areas either on-site or offsite that are ecologically appropriate for one or more types of mitigation and implementing the mitigation, as described below.

1. All or a portion of the mitigation can be satisfied through the deduction or purchase of mitigation credits at a County-approved mitigation bank[4] (e.g., Ramona Grasslands Conservation Bank, Brook Forest Mitigation Bank, Cleveland Corridor Conservation Bank, or San Luis Rey Mitigation Bank). A verification step is required to confirm appropriate mitigation habitats, types, and acreages are available via banks to provide in-kind habitat mitigation or acceptable out-of-kind mitigation (i.e., mitigation habitat value at least equal to the impacted habitat). With concurrence from the County (and agencies for aquatic resources), final mitigation acreage may be adjusted if the types of mitigation merit adjustments in the mitigation ratios. For example, in the case of mitigation banks that include established or reestablished (creation) habitats, an overall 1:1 replacement ratio is typically appropriate because bank restored habitats are established (i.e., already existing) and thus, there is no temporal loss of wetlands (and associated functions and

[4] County of San Diego. 2022. *County of San Diego Mitigation Banks*. Available online at: https://www.sandiegocounty.gov/content/sdc/pds/mitbnks.html. Accessed on October 21, 2022.

services) from the time that impacts occur to the completion of mitigation (i.e., meeting performance standards). Replacement ratios are partly based on potential temporal loss of habitat and a degree of uncertainty regarding long-term success. The deduction or purchase of completed mitigation credits from a bank, which includes long-term management, addresses those factors and therefore a reduced ratio, as low as 1:1, may be appropriate.

2. All or a portion of the mitigation can be satisfied through the preparation of a revegetation plan that would be approved prior to issuance of a grading permit. The plan would detail mitigation for impacts to sensitive natural communities and naturalized communities and submittal to the County (and agencies for aquatic resources), followed by successful implementation of the approved plan. The mitigation shall be planned and implemented at appropriate location(s) either on-site (i.e., adjacent to and contiguous with native habitat associated with Santa Maria Creek that will be avoided and potentially preserved by the project) or at an off-site location. As referenced above, if a given site is appropriate as open space and site-specific factors dictate mitigation would be biologically viable for one or more habitat types, the County may approve one or more sites for mitigation for a given project. If a revegetation plan is prepared, it shall detail performance standards, maintenance, and future monitoring, and at a minimum, shall include monitoring by a qualified biologist for five years to verify that sensitive vegetation communities have been successfully mitigated. The mitigation planning process will also document the mitigation site property status and open space preservation mechanism to ensure the property is protected over the long-term. A revegetation plan shall include, as needed for the particular habitat and type of mitigation, the following:

    a. A native planting palette appropriate for the vegetation type being mitigated and appropriate to local conditions.
    b. Temporary irrigation for the first 2 to 3 years after native planting. Irrigation should be removed during the final 2 years of mitigation to ensure the mitigation habitat is self-sustaining.
    c. A post-installation 120-day plant establishment period plus 5-year mitigation maintenance period (or until performance standards are met).
    d. A five-year maintenance period including native plant care, temporary irrigation (as needed), non-native plant (weed) treatment/removal, erosion control, and site protection.
    e. Performance standards for the establishment period and years 1–5.
    f. Qualitative and quantitative monitoring methods to ensure that performance standards are tracked and met, implementation of an adaptive management approach.
    g. Responsibilities and qualifications of the mitigation maintenance contractor(s) and restoration ecologist.
    h. Description of annual reporting.

Mitigation for Potentially Significant Impacts to Regional Wildlife Movement

MM-BIO-8: Prior to and during construction, the following shall apply:

1. The project impact footprint will be staked and fenced (e.g., with snow fencing or silt fencing) by a surveyor and the boundary will be confirmed by a qualified biological monitor. The construction site manager will ensure that the fencing is maintained for the duration of construction and that any required repairs are completed in a timely manner.
2. If any wildlife is encountered during maintenance activities, the wildlife should be allowed to leave the work area unharmed and shall be flushed or herded in a safe direction away from the work area(s).
3. Qualified biological monitor(s) will be on-site during all grubbing (i.e., vegetation removal) activities to flush any wildlife within the project impact footprint away from work areas.
4. Any open trenches should be covered at the end of each work day in a manner to prevent the entrapment of wildlife, or adequately ramped to provide an animal escape.
5. If night-time maintenance is required, lighting should be directed away from native vegetation and should be limited to the minimum amount necessary to complete the maintenance activities.

Upon project build-out (i.e., post-construction), the following shall apply:

1. Lighting will be shielded and/or directed away from open space areas to ensure that ambient lighting within open space areas or the wildlife corridor is not increased.
2. Signage and appropriate physical barriers, if deemed necessary, will be incorporated to deter unauthorized public access, domestic animal predation, and illegal trespass or dumping into open space areas or the wildlife corridor.
3. An educational kiosk should be installed along the trail to inform residents and trail users about the sensitive natural resources within the area. Education will emphasize the importance of obeying signs and staying on-trail along open space areas and the wildlife corridor.

Therefore, through implementation of mitigation measures **MM-BIO-1** through **MM-BIO-8**, the proposed project would not result in new significant environmental impacts to biological resources and impacts would be consistent with the 2017 IS/MND.

V. CULTURAL RESOURCES – Since the previous EIR was certified or previous MND was adopted, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause one or more effects to cultural resources including: cause a substantial adverse change in the significance of a historical or archaeological resource as defined in State CEQA Guidelines Section 15064.5; and/or disturbing any human remains, including those interred outside of formal cemeteries?

YES	NO
☐	☒

The 2017 IS/MND concluded that impacts to Cultural and Paleontological resources would be less than significant.

The proposed project differs from the previous project analyzed in the 2017 IS/MND in that the project footprint would decrease in size from 14 acres in 2017 to approximately 7.86 acres currently. Additionally, as detailed in Table 2, the current project would include the construction of 100 affordable senior housing units, a senior center, a PACE Wellness Center, and a public park area, and would no longer include the previously proposed community gymnasium and teen café, childcare center, and community support center.

In support of the current proposed project, a cultural resources assessment report (ESA 2023) was prepared and is included as Appendix E. The report provides the methods and results of a records search conducted by the California Historical Resources Inventory System (CHRIS) South Coastal Information Center (SCIC), a Sacred Lands File Search conducted by the California Native American Heritage Commission, a desktop subsurface archaeological assessment, and a cultural resources survey.

As a result of the cultural resources assessment, no cultural resources were identified within the proposed project site. One historic-period archaeological site consisting of the remnants of a single-family residence (RICC-Temp-001) documented in 2015 is located within close proximity of the project site. The archaeological site, which was previously recommended as not eligible for listing in the California Register of Historical Resources or local register, does not extend into the project site. The cultural resources assessment also concluded that the likelihood for encountering unknown subsurface archaeological deposits within the proposed project site during construction is low. Much of the proposed project's construction would occur within the project site's southern half, which has been previously subject to grading and is located within a geologic unit that has low to no potential for subsurface archaeological deposits. The proposed project site's northern half is largely comprised of the Santa Maria Creek corridor, which is characterized by river wash deposits that are not conducive for the preservation of subsurface archaeological deposits given the active environment of the floodplain and the likelihood for encountering subsurface archaeological deposits is low. Therefore, implementation of the proposed project would not result in significant impacts to known historical or unique archaeological resources, and the likelihood for project ground disturbance to significantly impact unknown subsurface archaeological deposits that qualify as historical resources or unique archaeological resources is low. However, the proposed project is required to comply with the County's Grading and Clearing Ordinance. In order to ensure compliance with the Grading ordinance, an archaeological and Native American monitoring program would be required as outlined by **MM-CUL-1** in the 2017 IS/MND. Therefore, impacts to cultural resources would remain less than significant.

No known formal or informal cemeteries or other burial places are known to exist within the project site. However, because the proposed project would involve grading activities, there is the possibility that such actions could unearth, expose, or disturb previously unknown human remains. Implementation of **MM-CUL-1** as outlined in the 2017 IS/MND, which includes inadvertent discovery protocols for human remains, would reduce potential impacts to human remains to less than significant.

The 2017 IS/MND mitigation measure **MM-CUL-1** is listed below:

MM-CUL-1: Prior to approval of any grading and/or improvement plans and issuance of any Grading or Construction Permits, the project applicant shall retain a County Approved Principal Investigator (PI) known as the "Project Archaeologist to implement an Archaeological Monitoring

Program and potential Data Recovery Program pursuant to the County of San Diego Guidelines for Determining Significance for Cultural Resources and CEQA. The details of the archaeological monitoring program are provided below:

- Pre-Construction
  - Pre-construction meeting to be attended by the Project Archaeologist and Kumeyaay Native American monitor to explain the monitoring requirements.
- Construction
  - Monitoring. Both the Project Archaeologist and Kumeyaay Native American monitor are to be onsite during earth disturbing activities. The frequency and location of monitoring of native soils will be determined by the Project Archaeologist in consultation with the Kumeyaay Native American monitor. Monitoring of previously disturbed soils will be determined by the Project Archaeologist in consultation with the Kumeyaay Native American monitor.
  - Temporary Fencing: As decided by the County of San Diego, exclusionary fencing will be installed surrounding all NRHP historic property components within the project area. Temporary fencing will likely be sufficient, and should be present throughout the duration of construction with potential to directly impact these nine eucalyptus trees. The Project Archaeologist will be responsible for making periodic checks of the fencing to confirm that it remains in good repair.
  - If cultural resources are identified:
    - Both the Project Archaeologist and Kumeyaay Native American monitor (if of Native American origin) have the authority to divert or temporarily halt ground disturbance operations in the area of discovery.
    - The Project Archaeologist shall contact the County Archaeologist.
    - The Project Archaeologist in consultation with the County Archaeologist and Kumeyaay Native American shall determine the significance of discovered resources.
    - Construction activities will be allowed to resume after the County Archaeologist has concurred with the significance evaluation.
    - Isolates and non-significant deposits shall be minimally documented in the field. Should the isolates and non-significant deposits not be collected by the Project Archaeologist, the Kumeyaay Native American monitor (if materials are of Native American origin) may collect the cultural material for transfer to a Tribal curation facility or repatriation program.
    - If cultural resources are determined to be significant, a Research Design and Data Recovery Program shall be prepared by the Project Archaeologist in consultation with the Kumeyaay Native American monitor and approved by the County Archaeologist. The program shall include reasonable efforts to preserve (avoid) unique cultural resources of Sacred Sites; the capping of identified Sacred Sites or unique cultural resources and placement of development over the cap if avoidance is infeasible; and data recovery for non-unique cultural resources. The preferred option is preservation (avoidance).

- Human Remains.
  - The Property Owner or their representative shall contact the County Coroner and the PDS Staff Archaeologist.
  - Upon identification of human remains, no further disturbance shall occur in the area of the find until the County Coroner has made the necessary findings as to origin.
  - If the remains are determined to be of Native American origin, the Most Likely Descendant (MLD), as identified by the Native American Heritage Commission (NAHC), shall be contacted by the Property Owner or their representative in order to determine proper treatment and disposition of remains.
  - The immediate vicinity where the Native American human remains are located is not to be damaged or disturbed by further development activity until consultation with the MLD regarding their recommendations as required by Public Resources Code Section 5097.98 has been conducted.
  - Public Resources Code Section 5097.98, CEQA Section 15064.5 and Health & Safety Code Section 7050.5 shall be followed in the event that human remains are discovered.

- Rough Grading
  - Upon completion of Rough Grading, a monitoring report shall be prepared identifying whether resources were encountered.
- Final Grading
  - A final report shall be prepared substantiating that earth-disturbing activities are completed and whether cultural resources were encountered.
  - Disposition of Cultural Material.
    - The final report shall include evidence that all prehistoric materials have been curated at a San Diego curation facility or culturally affiliated Tribal curation facility that meets federal standards per 36 CFR Part 79, or alternatively has been repatriated to a culturally affiliated Tribe.
    - The final report shall include evidence that all historic materials have been curated at a San Diego curation facility that meets federal standards per 36 CFR Part 79.

VI. ENERGY – Since the previous EIR was certified or previous MND was adopted, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that result in one or more effects related to environmental effects associated with wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation; and/or conflicts with or obstructs a state or local plan for renewable energy or energy efficiency?

YES	NO
☐	☒

The 2017 IS/MND did not include an energy consumption analysis as it was not required by CEQA at that time. The analysis below addresses energy impacts associated with the proposed project not addressed in the 2017 IS/MND.

Construction

Construction of the proposed project would result in energy consumption from the use of heavy-duty construction equipment, on-road trucks, and construction workers commuting to and from the project site. For the purposes of this analysis, heavy-duty construction equipment is assumed to use diesel fuel, which is the most conservative scenario for maximum potential energy use during construction.

Construction of the proposed project would require the consumption of energy for necessary onsite activities and to transport soil and materials to and from the project site. The proposed project would export approximately 500 cubic yards of soil and import 5,500 cubic yards of soil during the grading/excavation phase, with the remaining soil to be balanced on-site. The reuse and balancing of soil on-site would reduce the number of haul truck trips needed thereby reducing the amount of haul truck miles driven and the amount of transportation fuels used for construction. Furthermore, compliance with the previously discussed anti-idling (i.e., 13 CCR, Section 2485 – anti-idling regulation) and emissions regulations (i.e., 13 CCR, Section 2025 – Truck and Bus regulation and 13 CCR, Section 2449 – In-Use Off-Road Diesel Fueled Fleets regulation) would result in a more efficient use of construction-related energy and the minimization or elimination of wasteful and unnecessary consumption of energy. The project would also reduce the need for nighttime construction lighting and associated energy demand as the project would comply with Section 36.408 of the County's Municipal Code, which prohibits construction between the hours of 7:00 P.M. and 7:00 A.M. Monday through Saturday, and at any time on Sunday or a holiday (i.e., construction is allowed Monday through Saturday between 7:00 A.M. to 7:00 P.M.). Therefore, construction of the proposed project would not result in the wasteful, inefficient, and unnecessary consumption of energy. For these reasons, construction energy impacts would be less than significant.

For disclosure purposes, the project's construction energy demand is provided below. The estimated fuel usage for off-road equipment is based on the number and type of equipment that would be used during construction activities, hour usage estimates, the total duration of construction activities, and hourly equipment fuel consumption factors from the OFFROAD model. On-road equipment would include trucks to haul material to and from the project site and vendor trucks to deliver supplies necessary for project construction. The estimated fuel usage for on-road trucks is based on the engineering estimates that form the basis of the construction-related impact analyses and fuel consumption information from the CARB EMFAC2021 model. The number of construction workers that would be required would vary based on the phase of construction and activity taking place. The transportation fuel required by construction workers to travel to and from the project site would depend on the total number of worker trips estimated for the duration of construction activity. The estimated fuel usage for construction worker commutes is based on the estimated number of workers for different phases of construction, the average distance that the workers would travel on local and regional roadways from CalEEMod, and emissions factors in the EMFAC2021 model. A summary of the annual fuel consumption during construction of the proposed project is provided in **Table 5**, *Project Construction and County Fuel Usage*. As shown in Table 5, on- and off-road vehicles would consume an estimated annual average of 66,212 gallons of diesel fuel and 33,750 gallons of gasoline fuel for each year of construction of the proposed project. A complete listing of the equipment by phase, emission factors, and calculation parameters used in this analysis is included within the emissions calculation worksheets that are provided in Appendix F of this checklist.

For comparison purposes, the proposed project's construction energy demand from transportation fuel is compared to the San Diego County transportation fuel sales. As shown in Table 5, the proposed project would represent a very small fraction of the County's total fuel consumption. Construction of the proposed project would result in short-term and temporary energy demand lasting approximately 1.9 years.

Table 5
Project Construction and County Fuel Usage

Source	Gallons of Diesel Fuel	Gallons of Gasoline Fuel
San Diego County (in 2020) [a]	247,900,000	1,165,000,000
Project Construction:		
Heavy-Duty Construction Equipment	189,629	-
Haul/Vendor Trucks	36,174	-
Worker Vehicles	**-**	**64,125**
Annual Project Construction (approximately a 1.9-year construction duration)	**66,212**	**33,750**
Percent of County	0.027%	0.0029%

[a] California Energy Commission, California Retail Fuel Outlet Annual Reporting (CEC-A15) Results, 2020. Available at: https://www.energy.ca.gov/data-reports/energy-almanac/transportation-energy/california-retail-fuel-outlet-annual-reporting. Accessed May 2022. Diesel is adjusted to account for retail (49 percent) and non-retail (51 percent) diesel sales.

SOURCE: ESA 2023.

Operations

Electricity

Operation of the proposed project would increase the demand for electricity for building and water resources (supply, conveyance, distribution, and treatment). The proposed project would comply with the applicable provisions of the Title 24 Building Energy Efficiency Standards and the CALGreen Code in effect at the time of building permit issuance for energy efficiency and electrification of new buildings. The proposed project would also include five electric vehicle (EV) parking spaces equipped with electric vehicle charging spaces (EVCS). This would support the electrification of the project, which supports the broader Statewide goal of transitioning away from fossil fuel-based energy sources in accordance with the State's Renewables Portfolio Standard (RPS) that will provide 60 percent carbon free electricity by 2030 and 100 percent carbon free electricity by 2045. Furthermore, the proposed project would be constructed to achieve GreenPoint Rated certification, which would document its consistency with environmental standards for sustainability and efficiency. As such, the proposed project would minimize energy demand. In addition, the proposed project would be constructed to incorporate low-flow plumbing fixtures and appliances and water-efficient irrigation. Therefore, operation of the proposed project would not result in the wasteful, inefficient, and unnecessary consumption of electricity. Thus, the proposed project would not result in the wasteful, inefficient, and unnecessary consumption of energy.

For disclosure purposes, the proposed project's estimated operational energy demand is provided in **Table 6**, *Project Operational Energy Usage and State and Regional Energy Supply*. As shown in Table 6, the project would result in a projected consumption of electricity totaling approximately 612.19 megawatt-hours (MWh) per year.

Table 6
Project Operational Energy Usage and State and Regional Energy Supply

Source	Electricity Per Year (MWh)	Diesel Fuel Per Year (gallons)	Gasoline Fuel Per Year (gallons)
SDG&E (2025)[a,b]	18,212,000	—	—
San Diego County (Transportation Sector) (2022)[c]	—	247,900,000	165,000,000
Project Operations:			
Building Electricity	566,914	—	—
Electric Vehicle (EV) Charger	5.72	—	—
Transportation[d]	—	13,230	90,298
Water Electricity	29	—	—
Total	**612.19**	**13,230**	**90,298**
Percent of SDG&E	0.003%	—	—
Percent of San Diego County (Transportation Sector)	—	0.005%	0.008%

NOTE:

[a] Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix F.

[b] San Diego Gas & Electric Company. September 1, 2020. SDG&E Integrated Resource Plan 2020, Appendix A, accessed September 1, 2023.

[c] California Energy Commission, August 2022. 2022 California Annual Retail Fuel Outlet Report Results. Accessed September 1, 2023.

[d] California Air Resources Board, EMFAC2021 (SD County; Annual; 2024', Aggregate Fleet).

SOURCE: ESA, 2023.

For year 2025, SDG&E projects annual electric sale to customers of approximately 18,212 million MWh (SDGE 2020). The proposed project's electricity demand represents approximately 0.003 percent of the SDG&E's projection of electricity sales for 2025.

Natural Gas

The proposed project qualifies as an all-electric-building and would not use natural gas or include natural gas infrastructure, and thus would not increase the demand for natural gas resources. Therefore, impacts related to consumption of natural gas from operations of the proposed project would be less than significant.

Transportation Energy

CARB approved the Advanced Clean Cars II rule which codifies Executive Order N-79-20 and requires 100 percent of new cars and light trucks sold in California be zero-emission vehicles by 2035. The State has also adopted Assembly Bill (AB) 2127, which requires the California Energy Commission (CEC) to analyze and examine charging needs to support California's EVs in 2030 and to support decision-makers allocation of resources to install new EVCS where they are needed most. The project would include five EVCS parking spaces, which would support the broader Statewide goal of transitioning away from fossil fuel-based transportation energy sources and electrification of transportation. The proposed project would also support reducing vehicle miles traveled (VMT) given its location near existing public transit bus routes along Main Street from North County Transit District and Metropolitan Transit System. Furthermore, the project's residential uses would be 100 percent affordable units, which supports VMT reduction strategies and associated transportation GHG emissions reductions. The California Air Pollution

Control Officers Association (CAPCOA) published its *Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity*, the purpose of which is to provide local governments with accurate, reliable, and standardized emission reduction quantification methods for land use, climate action, and long-term planning (CAPCOA 2021). The handbook includes VMT and GHG reduction measure, T-4 (Integrate Affordable and Below Market Rate Housing), which states that affordable "housing provides greater opportunity for lower income families to live closer to job centers and achieve a jobs/housing match near transit. It is also an important strategy to address the limited availability of affordable housing that might force residents to live far away from jobs or school, requiring longer commutes" (CAPCOA 2021). The project's 100 percent affordable units would have access to the existing public transit bus routes along Main Street from North County Transit District and Metropolitan Transit System. Thus, the proposed project would not result in the wasteful, inefficient, and unnecessary consumption of transportation energy.

The proposed project's estimated operational transportation fuel demand is provided in Table 6. According to the 2020 results of the California Energy Commission California Annual Retail Fuel Outlet Report California Gas Report (CEC 2019), based on the proposed project's estimated fuel consumption as shown in Table 6, the proposed project would account for approximately 0.008 percent of SD County's total gasoline sales and 0.005 percent of SD County's total diesel sales for year 2025. Therefore, it is anticipated that existing transportation fuel supplies would be sufficient to support the proposed project's demand for transportation fuel. Therefore, impacts related to transportation fuel consumption from operations of the proposed project would be less than significant.

Conclusion

Operation of the proposed project would result in energy usage from building energy demand and transportation-related energy associated with vehicles traveling to and from the project site. The amount of energy used would not represent a substantial fraction of the available energy supply in terms of building energy or transportation fuels and would not increase the need for new energy infrastructure. The proposed project is consistent with the current Title 24 Building Energy Efficiency Standards and the CALGreen Code as well as the County's General Plan. Therefore, with the implementation of applicable Title 24 Building Energy Efficiency Standards and incorporation of low-flow plumbing fixtures and appliances and water-efficient irrigation, the proposed project would not result in the wasteful, inefficient, and unnecessary consumption of building energy or transportation energy and would not increase the need for new energy infrastructure or preempt opportunities for future energy conservation. Therefore, operational energy impacts would be less than significant.

The proposed project would be designed in a manner that is consistent with relevant energy conservation plans designed to encourage development that results in the efficient use of energy resources. The General Plan includes strategies applicable to the proposed project such as reduce non-renewable electrical energy consumption and generation (energy efficiency), reduce water consumption, and reduce and maximize reuse of solid wastes. As stated above, the proposed project would comply with Title 24 Building Energy Efficiency Standards and the CALGreen Code requirements to reduce energy consumption by incorporation of low-flow plumbing fixtures and appliances and water-efficient irrigation.

Overall, the proposed project's features would support and promote energy efficiency and would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Therefore, energy impacts would be less than significant.

VII. GEOLOGY AND SOILS – Since the previous EIR was certified or previous MND was adopted, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that result in one or more effects from geology and soils including: directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault, seismic-related ground failure, including liquefaction, strong seismic ground shaking, or landslides; result in substantial soil erosion or the loss of topsoil; produce unstable geological conditions that will result in adverse impacts resulting from landslides, lateral spreading, subsidence, liquefaction or collapse; being located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property; and/or having soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater; and/or directly or indirectly destroying a unique paleontological resource or site or unique geologic feature?

YES	NO
☐	☒

The 2017 IS/MND concluded geology and soils impacts would be less than significant.

The proposed project site occupies 7.86 acres of the previous 14-acre 2017 RICC site. The proposed project includes ground disturbance and development within the southern portion of the project site and would result in a smaller area of disturbance compared to the previous 2017 project.

Faulting and Seismicity

The proposed project is not located in a hazard zone identified by the Alquist-Priolo Earthquake Fault Zoning Act. The Elsinore Fault, which is located 14 miles northeast, is the nearest active fault to the project site (County of San Diego 2011). Although there are several inferred faults located in the Ramona Community Planning Area (CPA), these faults are not known to be active. Furthermore, to ensure the structural integrity of all buildings and structures, the project must conform to the Seismic Requirements as outlined within the California Building Code. The County Code of Regulatory Ordinances requires a soils compaction report with proposed foundation recommendations to be approved prior to the issuance of a building permit. Therefore, impacts related to exposure of people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving rupture of a known earthquake fault would be less than significant, consistent with the 2017 IS/MND.

Seismic-Related Hazards

As indicated by the San Diego County General Plan, the project site is located within a "Potential Liquefaction Area" as defined in the County Guidelines for Determining Significance for Geologic Hazards (County of San Diego 2007b). However, similar to the previous project, the proposed project site is not prone to liquefaction, and is not located in a landslide susceptibility area. Soils on the southern portion of the project site consist of a mixture of Placentia sandy loam at slopes

of 2 to 9 percent and Visalia sandy loam at slopes of 0 to 2 percent, have soil erodibility of "slight," and shrink-swell behavior of low and represent no substantial risks to life or property. The northern portion of APN 281-182-18-00 has soils identified as cobbly river wash that is excessively drained and permeable (NRCS 2021). The proposed project would be required to comply with County of San Diego General Plan Policy S-7.2, which would require development to include engineering measures to reduce risk in accordance with the California Building Code, Uniform Building Code, and other seismic and geologic safety hazards, including design and construction standards. Therefore, impacts related to seismic-related hazards would be less than significant, consistent with the 2017 IS/MND.

Soil Erosion/Topsoil Loss

Similar to the previous project, the proposed project would be required to comply with the San Diego Code of Regulations, Title 8, Zoning and Land Use Regulation, Division 7, Section 87.414 (Drainage – Erosion Prevention) and 87.417 (Planting). The project must also comply with the County's Grading Ordinance requirements, which requires either (1) the removal of expansive soils; or (2) installation of an appropriate foundation approved by a licensed civil engineer if expansive soils are encountered during construction.

The proposed project site is located within a 100-year floodplain, as identified by the Federal Emergency Management Agency (FEMA). The majority of the proposed project site is located within Zone X, or 0.2 percent annual chance of flood hazards. The northern and northeastern portions of the project site are located within the Santa Maria Creek floodway (Zone AE); however, the proposed project does not propose any structures within the Santa Maria Creek floodway, which eliminates the potential for soil erosion or geological impacts to occur as a result of the project construction. Compliance with applicable regulations would reduce the potential for erosion on-site from construction activities to the maximum extent practicable. Therefore, impacts related to erosion and topsoil loss would be less than significant, consistent with the 2017 IS/MND.

Expansive Soils

As indicated in the 2017 IS/MND, the project site does not contain expansive soils as defined by Table 18-I-B of the Uniform Building Code (1994). The soils on the main project site are a mixture of Placentia sandy loam 2 to 9 percent, Visalia sandy loam 0 to 2 percent, and cobbly river wash. These soils have a shrink-swell behavior of low and represent no substantial risks to life or property. Therefore, the proposed project would not create a substantial risk to life or property. This was confirmed by review of the Soil Survey for the San Diego Area, prepared by the US Department of Agriculture, Soil Conservation and Forest Service dated December 1973. As such, impacts would be less than significant, consistent with the 2017 IS/MND.

Alternative Wastewater Systems

The proposed project would not include any septic waste systems and would rely on public water and sewer for the disposal of wastewater. A Project Facility Availability - Sewer Service Letter dated August 16, 2023 was provided by the Ramona Municipal Water District (RMWD) indicating that the facility would have adequate capacity for the proposed project's wastewater disposal needs with the adherence to certain conditions (Appendix L). A site-specific project level sewer analysis would be required to be prepared with final design of the proposed project to ensure

that the RMWD has sufficient capacity for the proposed project. Similar to the 2017 IS/MND, no septic tanks or alternative wastewater disposal systems are proposed. Therefore, no impact related to alternative wastewater systems would occur, consistent with the 2017 IS/MND.

Paleontological Resources

A paleontological resources database check was conducted by the San Diego County Natural History Museum (SDNHM) to assess the project site's paleontological sensitivity. A letter report summarizing a paleontological resources database check was prepared by the SDNHM for the proposed project (Appendix G). The letter report did not identify the presence of any fossil localities within the project site or its vicinity and stated the project site is underlain by Cretaceous-age intrusive igneous rocks and Holocene-age wash deposits, both of which have low to no paleontological sensitivity. Therefore, the proposed project would have no impact on unique geologic features or paleontological resources, consistent with the 2017 IS/MND.

VIII. GREENHOUSE GAS EMISSIONS – Since the previous EIR was certified or previous MND was adopted, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause one or more effects to greenhouse gas emissions including: generation of greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment; and/or conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

YES	NO
☐	☒

The 2017 IS/MND concluded less-than-significant impacts related to generation of GHG emissions, either directly or indirectly, that may have a significant impact on the environment and whether the original project would conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs.

The proposed project differs from the previous project because the project footprint has been reduced from 14 acres in 2017 to 7.86 acres currently. Furthermore, as detailed in Table 2, the proposed project would include the construction of 100 affordable senior housing units, a senior center, a PACE Wellness Center, and a public park area, and would no longer include the previously proposed community gymnasium and teen café, childcare center, and community support center.

In the U.S Supreme Court of Massachusetts v. Environmental Protection Agency (2007) 549 U.S. 497, the U.S. Supreme Court held in April of 2007 that the USEPA has statutory authority under Section 202 of the federal Clean Air Act (CAA) to regulate GHGs. An overview of relevant regulations and a brief discussion of the proposed project's compliance with applicable regulations is provided below.

In 2006, the State of California passed the Global Warming Solutions Act of 2006, commonly referred to as AB 32, which set a GHG emissions reduction goal for the State into law. The law requires that by 2020, State emissions must be reduced to 1990 levels by reducing GHG emissions from significant sources via regulation, market mechanisms, and other actions. Enacted in 2016, Senate Bill (SB) 32 codified a 2030 emissions reduction target that requires CARB to ensure that statewide GHG emissions are reduced to 40 percent below 1990 levels by

2030. AB 1279, the California Climate Crisis Act, establishes the policy of the State to achieve carbon neutrality as soon as possible, but no later than 2045; to maintain net negative GHG emissions thereafter; and to ensure that by 2045 statewide anthropogenic GHG emissions are reduced at least 85 percent below 1990 levels. SB 375, passed in 2008, links transportation and land use planning with global warming. It requires the CARB to set regional targets for the purpose of reducing GHG emissions from passenger vehicles. Under this law, if regions develop integrated land use, housing, and transportation plans that meet SB 375 targets, new projects in these regions can be relieved of certain review requirements under CEQA. San Diego County uses its General Plan to direct future growth in the unincorporated areas of the County.

To implement State mandates to address climate change in local land use planning, local land use jurisdictions generally prepare GHG emission inventories and reduction plans, or Climate Action Plans (CAP). While San Diego County adopted a CAP in 2018, which includes strategies and measures to reduce GHG emissions, the Superior Court ordered the CAP and EIR to be set aside in 2020, which was upheld on appeal. The County continues to implement the GHG reduction measures in the CAP while it works to correct the CAP EIR as directed by the court. Therefore, it is not appropriate to evaluate consistency with the 2018 CAP or EIR for CEQA purposes. Rather, the analysis relies upon the CARB 2022 Scoping Plan for Achieving Carbon Neutrality, County's General Plan, and SANDAG 2021 Regional Plan to establish consistency with relevant plans and policies.

Consistency with Plans

A significant impact would occur if the proposed project would generate GHG emissions, either directly or indirectly, that conflict with an applicable plan, policy or regulation adopted for the purpose of reducing GHG emissions. Consistency is evaluated with regard to CARB's 2022 Scoping Plan, the County of San Diego General Plan, and SANDAG 2021 Regional Plan.

CARB's 2022 Scoping Plan

The 2022 Scoping Plan presents a non-exhaustive list of impactful GHG reduction strategies that can be implemented by local governments within the three priority areas (Priority GHG Reduction Strategies for Local Government Climate Action Priority Areas) (CARB 2022). A detailed assessment of goals, plans, and policies implemented by the City which would support the GHG reduction strategies in the three priority areas is provided below. In addition, further details are provided regarding the correlation between these reduction strategies and applicable actions included in Table 2-1 (page 72) of the Scoping Plan (Actions for the Scoping Plan Scenario). Based on the discussions below, the proposed project would not conflict with applicable 2022 Scoping Plan strategies and regulations to reduce GHG emissions.

- Transportation Electrification

The priority GHG reduction strategies for local government climate action related to transportation electrification are discussed below and would support the Scoping Plan action to have 100 percent of all new passenger vehicles to be zero-emission by 2035 (see Table 2-1 of the Scoping Plan).

The CARB approved the Advanced Clean Cars II rule which codifies Executive Order N-79-20 and requires 100 percent of new cars and light trucks sold in California be zero-emission vehicles

by 2035. The State has also adopted AB 2127, which requires the CEC to analyze and examine charging needs to support California's EVs in 2030 and to support decision-makers allocation of resources to install new EV chargers where they are needed most.

The proposed project would include EV parking spaces equipped with EVCS, which would assist with reducing transportation emissions. Applicable Title 24 requirements that require at least 5% of spaces be EV capable for projects with 20 units or more would apply to the proposed project. The Project would provide 98 parking spaces (93 standard and five EVCS stall spaces), which would be located adjacent to the project site's western boundary. This would support the electrification of transportation-related sources of emissions and would reduce vehicle and equipment emissions. Thus, the project would not conflict with this strategy.

- Vehicle Miles Traveled Reduction

The priority GHG reduction strategies for local government climate action related to VMT reduction are discussed below and would support the Scoping Plan action to reduce VMT per capita 25 percent below 2019 levels by 2030 and 30 percent below 2019 levels by 2045.

The proposed project would generate a total of 567 vehicle trips during weekdays. The proposed project would support reducing VMT given its location near existing public transit bus routes along Main Street from North County Transit District and Metropolitan Transit System. Furthermore, the project's residential uses would be 100 percent affordable units, which supports VMT reduction strategies and associated transportation GHG emissions reductions. The California Air Pollution Control Officers Association (CAPCOA) published its *Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity*, the purpose of which is to provide local governments with accurate, reliable, and standardized emission reduction quantification methods for land use, climate action, and long-term planning (CAPCOA 2021). The handbook includes VMT and GHG reduction measure, T-4 (Integrate Affordable and Below Market Rate Housing), which states that affordable "housing provides greater opportunity for lower income families to live closer to job centers and achieve a jobs/housing match near transit. It is also an important strategy to address the limited availability of affordable housing that might force residents to live far away from jobs or school, requiring longer commutes" (CAPCOA 2021). The project's 100 percent affordable units would have access to the existing public transit bus routes along Main Street from North County Transit District and Metropolitan Transit System. As such, the project would not conflict with this strategy.

- Building Decarbonization

The priority GHG reduction strategies for local government climate action related to electrification are discussed below and would support the Scoping Plan actions regarding meeting increased demand for electrification without new fossil gas-fire resources and all electric appliances beginning in 2026 (residential) and 2029 (commercial) (see Table 2-1 of the 2022 Scoping Plan).

California's transition away from fossil fuel–based energy sources would bring the project's GHG emissions associated with building energy use down to zero as the State's electric supply becomes 100 percent carbon free. California has committed to achieving this goal by 2045 through SB 100, the 100 Percent Clean Energy Act of 2018. SB 100 strengthened the State's RPS by requiring that 60 percent of all electricity provided to retail users in California come from renewable sources by 2030 and that 100 percent come from carbon-free sources by 2045. The

land use sector will benefit from RPS because the electricity used in buildings will be increasingly carbon-free, but implementation does not depend (directly, at least) on how buildings are designed and built.

Although this GHG reduction measure is aimed primarily at jurisdictions and not individual projects, the project would be required to comply with applicable local requirements for building energy efficiency and electrification and would adhere to applicable CALGreen Code (Title 24) requirements for energy efficiency and electrification of new buildings. As previously stated, the project would include five EV parking spaces equipped with EVCS. This would support the electrification of the project.

Based on the above, the project would not conflict with this strategy for electrification and would be less than significant.

County of San Diego General Plan

The General Plan includes strategies applicable to the proposed project such as reduce non-renewable electrical and natural gas energy consumption and generation (energy efficiency), reduce water consumption, and reduce and maximize reuse of solid wastes. As stated above, the proposed project would comply with applicable Title 24 Building Energy Efficiency Standards and would benefit from utility-provider efforts towards increasing the portion of electricity provided from renewable resources consistent with SB 100, with an emission factor of 438.02 lbs/MWh for year 2025 scaled proportionately based on the future year renewable energy targets of 44 percent by 2024 and at least 52 percent by 2027. In addition, the proposed project would be constructed to incorporate low-flow plumbing fixtures and appliances and water-efficient irrigation and would be served by a solid waste collection and recycling service that include mixed waste processing, and that yields waste diversion of at least 60 percent (County of San Diego 2021). Therefore, impacts would be less than significant.

SANDAG 2021 Regional Plan

The 2021 Regional Plan lays out a framework to achieve the three main goals: 1) efficient movement of people and goods; 2) access to affordable, reliable, and safe mobility options, and; 3) healthier air and reduced GHG emissions. The proposed Project would comply with current 2022 Title 24 Building Energy Efficiency Standards and would benefit from utility-provider efforts towards increasing the portion of electricity provided from renewable resources get consistent with SB 100. The proposed project would be constructed to achieve GreenPoint Rated certification. As the proposed project would place a senior center and PACE Wellness Center alongside senior residential housing, it would provide medical, recreational, and transportation services to residents living within the project site as well as the surrounding community. This would reduce both the number of trips and trip lengths consistent with the goals in the 2021 Regional Plan and allow for an aging in place opportunity. Therefore, impacts would be less than significant.

Therefore, based on the above, the proposed project would not conflict with an applicable plan, policy or regulation pertaining to reducing GHG emissions, and the impact would be less than significant, consistent with the 2017 IS/MND.

GHG Emissions

The project's GHG emissions are disclosed below. As discussed above, the County has not adopted any newer guidance on GHG emission thresholds since the publication of the 2017 IS/MND, this GHG analysis relies upon the CARB 2022 Scoping Plan, County's General Plan, and SANDAG 2021 Regional Plan to evaluate whether the proposed project would emit GHGs that may have a significant impact on the environment and achieve GHG emissions reduction targets and to establish consistency with relevant plans and policies. As a reference point for comparison purposes, the proposed project's GHG emissions are compared to the GHG emissions estimated in the Global Climate Change Evaluation for the Romona Intergenerational Community Campus (2015 technical report) prepared for the prior project evaluated in the 2017 IS/MND.

Construction Emissions

Construction GHG emissions include emissions from heavy construction equipment, truck traffic, and worker trips. Emissions were calculated using CalEEMod version 2022.1.1, based on the anticipated construction schedule to full buildout in year 2025. Consistent with the 2017 IS/MND and in accordance with County of San Diego PDS requirements, all construction equipment was assumed to meet USEPA Tier 3 emission standards. Construction GHG emissions were amortized over 30 years and added to operational GHG emissions, consistent with the South Coast Air Quality Management District (SCAQMD) "Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans." Emissions from on-road vehicles were estimated outside of CalEEMod using EMFAC2021 emission factors for haul and material vendor trucks and worker vehicles. Activities parameters, such as number of pieces of equipment and equipment usage hours were based on CalEEMod defaults. A summary of the construction emissions is shown in **Table 7***, Annual Construction Greenhouse Gas Emissions Summary,* and in Appendix H, Greenhouse Gas Emissions Technical Report.

Table 7
Annual Construction Greenhouse Gas Emissions Summary (MTCO2e)

Year	Emissions
2024	835
2025	984
TOTAL[a]	**1,819**
Amortized Construction Emissions[b]	61

[a] Totals may not add up exactly due to rounding in the modeling calculations. Detailed emissions calculations are provided in Appendix H.

[b] Construction emissions are amortized over 30 years in accordance with SCAQMD guidance.

MT=metric tons; CO2e=carbon dioxide equivalent

SOURCE: ESA 2023.

Operational Emissions

Operational GHG emissions were calculated using CalEEMod version 2022.1.1 with adjustments to account for site-specific conditions. Building electricity usage rates were adjusted to account for the applicable Title 24 Building Energy Efficiency Standards. In addition, the proposed project would be constructed to incorporate low-flow plumbing fixtures and appliances and water-efficient irrigation. The carbon intensity factor was also adjusted to be consistent with SB 100, which represents the State's most current Renewable Portfolio Standard (RPS) law,

with an emission factor of 438.02 lbs/MWh for year 2025 scaled proportionately based on the future year renewable energy targets of 44 percent by 2024 and at least 52 percent by 2027. Operational GHG emissions includes area source emissions for landscaping equipment and architectural coatings; energy use emissions for both electricity use; transportation; water conveyance, treatment, distribution, end use, and wastewater treatment; and solid waste. For transportation, the 2015 technical report calculated a total annual vehicle miles travelled of 3,807,278 miles. Comparatively, the proposed project would result in 2,422,909 total annual miles. Similar to construction, operational emissions from on-road vehicles were estimated outside of CalEEMod using EMFAC2021. All vehicle types would visit the project site. Therefore, this assessment uses the San Diego Air Basin's motor vehicle fleet mix and the fleet average calendar year emissions factors from EMFAC2021 to estimate mobile source GHG emissions. In addition, emissions from EV charging were calculated by multiplying the number of parking spaces by the average daily charge to obtain the annual electricity demand. The electricity demand was multiplied by the electricity emissions factor which yielded the total GHG emissions per year. See Project Assumptions in Appendix H for calculation methodology. Solid waste diversion is assumed to be 60 percent based upon actual diversion in the unincorporated county in 2018 (County of San Diego 2021). The analysis and CalEEMod output files are found in Appendix A of the project's Greenhouse Gas Emissions Technical Report (Appendix H of this checklist), for additional details. Combined amortized construction emissions and operational emissions would generate 1,115 $MTCO_2e$ per year for the proposed project's full buildout in year 2025, as shown in **Table 8***, Comparison of Project Operational GHG Emissions*.

Table 8
Comparison of Project Operational GHG Emissions ($MTCO_2e$)

Emission Sources	CO2e (MT/year)
Area	1
Electricity[a]	94
Water	12
Waste	43
Motor vehicles	902
EV Charging	2
Amortized Construction[b]	61
Project Total[c]	**1,115**
2015 Technical Report Total	1,700
Difference in Emissions	(585)

[a] Building energy emissions (electricity) are included in the calculations. SDG&E is estimated to have a 46.67 percent renewable based upon linear interpolation of existing data and future RPS mandate.

[b] Construction emissions are amortized over 30 years in accordance with SCAQMD guidance.

[c] Totals may not add up exactly due to rounding in the modeling calculations.

MT=metric tons; CO2e=carbon dioxide equivalent

SOURCE: ESA 203.

The proposed project's GHG emissions would benefit from state and local GHG emission reduction mandates and strategies to achieve a declining trend in post-buildout annual GHG emissions. These reduction mandates and strategies include an aggressive RPS as set by SB 100, increased waste diversion, and improved building energy efficiency through adherence to

the applicable Title 24 Building Energy Efficiency Standards to reduce energy use. The RPS requires electricity supplied by the local utility to increase the proportion of renewable energy to 60 percent by the end of 2030 and to plan for 100 percent by the end of 2045. SDG&E is estimated to have a 46.67 percent renewable energy resources in the project buildout year of 2025 based upon linear interpolation of existing data and future RPS mandate. Per SB 100, SDG&E would be required to increase its renewable electricity to 60 percent by 2030 and to plan for 100 percent by 2045. Thus, the project's building energy-related GHG emissions would be reduced through SDG&E's renewable energy supply at project buildout and further declining post-buildout. With respect to waste diversion, the proposed project would be required to comply with the County's Construction and Demolition (C&D) Ordinance, which requires all projects within unincorporated San Diego County to recycle 65 percent of all materials, including 90 percent of inert materials, such as concrete, asphalt and dirt.[5] The project would also be required to comply with the County's Solid Waste Ordinance, which was updated in 2021 to incorporate state laws regarding recycling and organics recycling.[6] Public Resources Code (PRC) Division 30, Part 3 Chapter 12.8, Section 42649 et seq. requires businesses that produce four cubic yards or more of solid waste per week or multifamily residential dwellings of five units or more to arrange for recycling services consistent with state or local laws. In addition, PRC Division 30, Part 3 Chapter 12.9, Section 42649.8 et seq. includes requirements for organic waste recycling. The project's compliance with the updated County C&D and Solid Waste Ordinances would reduce the project's waste-related GHG emissions. The proposed project would implement additional sustainability features such as using low-flow fixtures (faucets, toilets, and showers) and water efficient landscaping. The proposed project would be constructed to achieve GreenPoint Rated certification, which would document its consistency with environmental standards for sustainability and efficiency. As discussed above, the analysis relies upon the CARB 2022 Scoping Plan, County's General Plan, and SANDAG 2021 Regional Plan to establish consistency with relevant plans and policies for evaluating the significance of GHGs. This analysis is provided below under the subheading, *Consistency with Plans*.

2030 GHG Emissions

Annual Total proposed project GHG emissions for year 2030 would be approximately 1,046 $MTCO_2e$/year. The proposed project would benefit from a 60 percent RPS target in 2030, a cleaner vehicle fleet mix, and all the same sustainability features implemented in the project's buildout year. Therefore, the proposed project would generate GHG emissions on a declining trend consistent with post-buildout GHG emissions reduction mandates and strategies for achieving the 2030 target.

2050 GHG Emissions

Annual proposed project GHG emissions for year 2050 would be approximately 859 $MTCO_2e$/year, based on available modeling tools that do not fully account for future reductions in emissions, particularly for mobile sources (i.e., EMFAC2021 does not fully account for the transition to electric vehicles by 2050). The proposed project would benefit from a carbon neutral grid in 2050, a cleaner vehicle fleet mix, and all the same sustainability features implemented in the

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5 San Diego County Department of Public Works. 2021. New Construction and Demolition Requirements. Effective January 1, 2021.

6 San Diego County Department of Public Works. 2021. https://www.sandiegocounty.gov/content/sdc/dpw/recycling/multifamily.html. Accessed November 2023.

project's buildout year. Therefore, the proposed project would generate GHG emissions on a declining trend consistent with post-buildout GHG emissions reduction mandates and strategies, including a carbon neutral grid, for achieving the 2050 target.

IX. HAZARDS AND HAZARDOUS MATERIALS – Since the previous EIR was certified or previous MND was adopted, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that result in one or more effects from hazards and hazardous materials including: create a significant hazard to the public or the environment through the routine transport, storage, use, or disposal of hazardous materials; create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment; emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school; be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 creating a hazard to the public or the environment; 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 or excessive noise for people residing or working in the project area; impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan; and/or expose people or structures either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

YES	NO
☐	☒

The 2017 IS/MND concluded that the previous project would result in less than significant environmental impacts with mitigation incorporated related to the exposure of people or structures to hazards that would result from project.

Hazardous Materials Sites Compiled Pursuant to Government Code 65962.5

In August 2015, a Hazards Assessment for the 2017 IS/MND was prepared, which concluded that the Caltrans parcel from the previous 2017 project was listed in multiple hazardous materials databases. A health risk evaluation conducted in 2004 indicated that there was a less than one in one million cancer risk for residential use at the site. According to the Case Closure Summary letter dated March 28, 2006, benzene and toluene in the groundwater are above the Environmental Protection Agency's (EPA) maximum contaminant levels (MCLs) of 5 µg/L and 1 µg/L, respectively. Furthermore, a review of hazardous materials database identified a release of gasoline to soil in October 1998 at the Ramona Texaco, located approximately 700 feet south of the current project site at 1210 Main Street (Dudek 2015). May 2015 concentration plume maps show that benzene and MTBE plumes extended onto the previous project site. Benzene concentrations for the past two years, in wells nearest the previous project site, ranged between 130 µg/L and 4,400 µg/L, greater than the EPA MCL of 5 µg/L.

The Department of Environmental Health (DEH) stated, in a letter dated March 13, 2015, that the Ramona Texaco should complete a health risk assessment to evaluate potential impacts to any proposed buildings constructed on APNs 281-191-03-00 and 284-191-20-00. If the results of the survey show a significant impact to the project site, the DEH would require the Ramona Texaco to mitigate the risk. At the time of adoption of the previous project, results of the soil vapor survey

were unknown (August 2017). Consequently, the previous 2017 IS/MND included mitigation measure **MM-HAZ-1**, which required the vapor soil survey, removal of a cargo container on the Caltrans site, and participation in the Voluntary Assistance Program for oversight of petroleum-impacted soil to be completed prior grading of the 2017 project.

The DEH approved a soil vapor survey on July 8, 2015 for the Ramona Texaco site, which included sampling at the previous project site. Four soil vapor probes were installed to 5 and 10 feet below ground surface (bgs) within APNs 281-191-03-00 and 284-191-20-00, to assess potential benzene vapors in the proposed location of the 2017 project (County of San Diego 2015). While benzene vapors were not detected in any of the soil gas samples, tetrachloroethane (PCE), a chemical not typically associated with gasoline, was detected at relatively low levels. The levels indicate a possible source of PCE in the area of the previous project. The potential cancer risk from benzene or PCE to a theoretical building occupant was calculated to be less than 1.00E-06 and was therefore not a significant health concern.

The proposed project differs from the previous project because the project footprint has been reduced from 14 acres in 2017 to 7.86 acres and would not include APNs 281-191-03-00 and 284-191-20-00. Furthermore, as detailed in Table 2, the proposed project would include the construction of 100 affordable senior housing units, a senior center, a PACE Wellness Center, and public park area, and would no longer include the previously proposed community gymnasium and teen café, childcare center, and community support center.

Since the adoption of the 2017 IS/MND, a Phase I Environmental Site Assessment (ESA) was prepared (July 2, 2019) for the proposed project. According to the ESA the proposed project site is not located within any hazardous materials databases, nor is the project site located near any site of environmental concern (AEC 2019). According to the Geotracker database, the Ramona Texaco site has been completed, and case closed as of April 17, 2019 (SWRCB 2021). Remedial operations for the Ramona Texaco site began on March 20, 2013, which included soil vapor extraction (SVE). Between 2013 and January 28, 2016, an estimated 31,444 pounds of total petroleum hydrocarbons (TPE) were removed from the soil. This mass recovered by SVE is in addition to the estimated 10,540 pounds of petroleum hydrocarbons (TPH) recovered during previous extraction operations in 2007. Therefore, the total estimated mass of TPH removed by active remediation to date is 41,984 pounds, or approximately 6,772 equivalent gallons of gasoline. DEH reports indicate that active remediation significantly reduced soil and groundwater contamination in the short-term and are anticipated to substantially reduce the time needed to attain maximum contaminant levels (MCLs). It is estimated that all wells will attain MCLs for benzene, ethylbenzene and methyl tertiary - butyl ether (MTBE) by 2024 (SWRCB 2021). As such, mitigation measure **MM-HAZ-1** identified in the 2017 IS/MND would no longer apply to the proposed project and impacts would be less than significant.

Routine and Accidental Use, Storage, Disposal and Spills of Hazardous Materials

Similar to the previous project, a variety of hazardous substances and wastes would be stored, used, and generated on the project site during construction of the proposed project. These include fuels for machinery and vehicles, new and used motor oils, cleaning solvents, paints, and storage containers and applicators containing such materials. Accidental spills, leaks, fires, explosions, or pressure releases involving hazardous materials represent a potential threat to human health and the environment if not properly treated. Accident prevention and containment

would be the responsibility of the construction contractors, and provisions to properly manage hazardous substances and wastes are typically included in construction specifications. Thus, **MM-HAZ-2** through **MM-HAZ-5** identified in the 2017 IS/MND would be implemented for the proposed project. The 2017 IS/MND mitigation measures are listed below:

MM-HAZ-2: During all excavation and construction activities, the developer shall monitor all contractors for compliance with applicable regulations, including regulations regarding hazardous materials and hazardous wastes (including disposal) and adherence to the construction specifications.

MM-HAZ-3: During all excavation and construction activities, hazardous materials shall not be disposed of or released onto the ground, the underlying groundwater, or any surface water. Totally enclosed containment should be provided for all refuse. All construction waste, including trash, litter, garbage, solid waste, petroleum products, and any other potentially hazardous materials, should be removed to a waste facility permitted to treat, store, or dispose of such materials have been included to ensure accidents would be prevented and contained.

MM-HAZ-4: Prior to excavation and construction, the developer shall develop a Site Mitigation Plan (SMP) and follow the SMP during all development activities. The SMP shall include strategies for identification and management of contaminated soil and shall outline mitigation measures should these development activities result in an accidental release of contaminants. A hazardous substance management, handling, storage, disposal, and emergency response plan shall be prepared and included in the SMP. Hazardous materials spill kits shall be maintained on-site for small spills. A copy of SMP shall be maintained on site during excavation, and construction of the proposed project, and all workers on the project site shall be familiar with this document.

MM-HAZ-5: A project-specific Health and Safety Plan (HASP) shall be developed and followed during all construction-related activities. Copies of the HASP shall be maintained on site during excavation, and construction of the proposed project, and all workers on the project site shall be familiar with this document.

According to the 2017 IS/MND, portions of the project site may have been used for agriculture from 1939 to 1979 and therefore residual pesticides may be present in shallow soils associated with the former agricultural uses that could result in the release of hazardous materials into the environment. As a result, the 2017 IS/MND included mitigation measure **MM-HAZ-6**, which required soil sampling of the project site before excavation activities to assess potential human health and environmental risk.

A 2019 historic records search within the Phase I ESA confirmed that the project site was likely used for agriculture in the 1960's. During historical agricultural activities throughout California, various pesticides and more specifically organochlorine pesticides were commonly applied during the normal course of agricultural operations (primarily irrigated row crops). Such compounds have since been banned from production and use in the United States. Section 105215 of the California Health and Safety Code discusses the regulatory reporting of incidents that pertain to pesticide spills and accidental releases of pesticide products.

Based on the regulatory and historical research completed during the 2019 Phase I ESA, no information has been revealed that would suggest that an accidental spill or release of pesticide

products has occurred at the proposed site. In addition, the historical agricultural activities appeared to be associated with dry farming activities and neither stressed vegetation nor evidence of the storage of pesticides was observed on the project site during the site reconnaissance or based on regulatory and historical research reviews. As such, the historical agricultural use of the proposed project site is not considered to be a recognized environmental condition in connection with the site. As such, mitigation measure **MM-HAZ-6** identified in the 2017 IS/MND would not be required and impacts would be less than significant.

Airport Hazards

As identified in the 2017 IS/MND, the project site is located within two miles of the Ramona Airport, and is within Review Area 2 of the Ramona Airport Land Use Compatibility Plan (ALUC 2011). Similar to the previous project, the proposed project includes the construction of one- and two-story buildings that would not exceed the 35-foot building height limit. The proposed project would comply with the San Diego County lighting ordinance and does not propose any navigational, bright lights, or visual hazards that may impair a pilot's vision. Landscaping is proposed; however, it would not contain any features which would unusually attract bird species that could be a nuisance to flight operations. In addition, the Applicant would submit a completed FAA Form 7460-1 Notice of Proposed Construction or Alteration form to the FAA for review and comment during the Minor Use Permit approval process. Therefore, impacts regarding airport-related hazards would be less than significant, consistent with the 2017 IS/MND.

Emergency Response or Evacuation Plans

The 2017 IS/MND concluded that impacts regarding impairment of an emergency response or evacuation plan would be less than significant. The Operational Area Emergency Plan for San Diego County is a comprehensive emergency plan that defines responsibilities, establishes an emergency organization, defines lines of communications, and is designed to be part of the statewide Standardized Emergency Management System (County of San Diego 2018). The Operational Area Emergency Plan provides guidance for emergency planning and requires subsequent plans to be established by each jurisdiction that has responsibilities in a disaster situation. The Multi-Jurisdictional Hazard Mitigation Plan includes an overview of the risk assessment process, identifies hazards present in the jurisdiction, hazard profiles, and vulnerability assessments. The plan also identifies goals, objectives and actions for each jurisdiction in the County of San Diego, including all cities and the County unincorporated areas (County of San Diego 2017). The proposed project would not interfere with this plan because it would not prohibit subsequent plans from being established or prevent the goals and objectives of existing plans from being carried out. Therefore, impacts regarding impairment of emergency evacuation or response plans would be less than significant, consistent with the 2017 IS/MND.

Wildland Fires

As identified in the 2017 IS/MND, fires have burned areas within three miles north of the previous project site. Due to the project site's location in the center of the Ramona Village Center, potential for wildfires is reduced due to surrounding development. Similar to the previous project, the proposed project is situated within Ramona Village Center within two of the previous parcels (APNs 281-182-17 and 281-182-18). According to the California Department of Forestry and Fire Protection (CALFIRE), the project site is not within a Very High Fire Hazard Severity Zone (VHFHSZ) (CALFIRE 2009). However, the project site is adjacent to a VHFHSZ, and is located in a wildland-urban interface (WUI) area (County of San Diego 2011).

The proposed project would not expose people or structures to significant risk of loss, injury or death involving wildland fires because the project would be required to comply with the regulations relating to emergency access, water supply, and defensible space specified in the Consolidated Fire Code for the 17 Fire Protection Districts in San Diego County and Appendix II-A of the Uniform Fire Code, as adopted and amended by the local fire protection district. Implementation of these fire safety standards would occur during the Minor Use Permit approval or building permit process.

While the proposed project has different uses from the 2017 project (as detailed in Table 2), a Project Facility Availability - Fire Service Letter, dated June 9, 2023, was provided by the San Diego County Fire Protection District for the proposed project (located in Appendix I). The letter indicates that based on the capacity and capabilities of the District's existing and planned facilities, fire protection facilities are currently adequate or will be adequate to serve the proposed project. Additionally, the letter states that expected emergency travel time to the proposed project would be 2.5 minutes. Similar to the 2017 IS/MND, the San Diego County Fire Protection District would still be able to adequately serve the project site for emergency fire services with the development of the proposed project. Therefore, through compliance with applicable fire prevention standards and through service provided by the San Diego County Fire Protection District, the proposed project's impacts related to exposing people or structures to a significant risk of loss, injury or death involving hazardous wildland fires would be less than significant, consistent with the 2017 IS/MND.

X. HYDROLOGY AND WATER QUALITY – Since the previous EIR was certified or previous MND was adopted, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause one or more effects to hydrology and water quality including: violation of any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality; substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin;; substantially alter the existing 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 result in substantial erosion or siltation on- or off-site, substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite, 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; or impede or redirect flood flows; in flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation; and/or conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

YES	NO
☐	☒

The 2017 IS/MND concluded the previous project would result in less-than-significant impacts to hydrology and water quality with implementation of mitigation measures.

The proposed project differs from the previous project because the project footprint has been reduced from 14 acres in 2017 to 7.86 acres currently. Furthermore, as detailed in Table 2, the proposed project would include the construction of 100 affordable senior housing units, a senior

center, a PACE Wellness Center, and public park area, and would no longer include the previously proposed community gymnasium and teen café, childcare center, and community support center.

Surface Water Quality and Drainage

Similar to the previous project, potential adverse effects of the proposed project on hydrology and drainage patterns would be associated with changes in land cover, particularly due to increases in impervious surfaces. The existing project site is vacant and undeveloped and features a mix of annual grasses and concrete, with localized areas of gravel and rip-rap. In addition, a closed depression that collects water during storm events and several storm water BMPs (vegetated swales) associated with construction of the Ramona Branch Library are located on the project site.

Similar to the previous project, stormwater runoff from the proposed project would flow to the north and north-west toward the Santa Maria Creek Channel. The proposed project would have the potential to discharge pollutants into the Santa Maria Creek during construction and operation. According to the Clean Water Act Section 303(d) list, the primary water quality issues affecting the Santa Maria Valley Hydrologic Area include total dissolved solids and bacteria/pathogens. Similar to the previous project, the project proposes land uses that could result in constituents of concern to enter the Creek including sediment, nutrients and/or pesticides, bacteria and viruses, trash and debris and oils. Furthermore, the northern portion of the proposed project site is located within the 100-year floodplain as identified by the Federal Emergency Management Agency (FEMA). According to initial Hydrologic Engineering Center's River Analysis System (HEC-RAS) mapping, the proposed public park area would be located within the 100-year floodway and the western portion of the proposed PACE Wellness Center would be located within the 100-year floodplain fringe. The proposed residential building/senior center is not located within the 100-year floodplain. If approved, County Resource Protection Ordinance (RPO) (specifically San Diego County Code of Regulatory Ordinances, Title 8, Division 6, Chapter 6) and FEMA regulations would be required to be met. According to the RPO, the proposed public park area would be an allowable use within the floodway, as it does not include a permanent structure for human habitation or a place of work. Additionally, the PACE Wellness Center would be an allowable use within the floodplain fringe, as it would be elevated by fill. The project applicant would request approval for a Conditional Letters of Map Revision (CLOMR) and Letters of Map Revisions (LOMR) from FEMA for portions of the proposed project located within the floodplain. The northern and northeastern portions of the project site are located within the Santa Maria Creek floodway (Zone AE); however, the project does not propose any structures within the Santa Maria Creek floodway, which would eliminate the potential for flooding which could result in water quality impacts.

The proposed project would disturb over one acre of soil and would be required to obtain a National Pollutant Discharge Elimination System (NPDES) permit for discharge of storm water associated with grading and construction activities and a Construction General Permit to avoid and minimize water quality impacts associated with construction activities. In compliance with the NPDES permit and to reduce potential pollutants to the maximum extent practicable, the proposed project would be required to implement the following site design, source control, and/or treatment control Best Management Practices (BMPs) identified in the 2017 IS/MND:

Site Design BMPs: Landscaping of the slopes and common areas are incorporated into the plans. The landscaping will consist of drought-tolerant plant species, including shrubs, grasses, and shade trees. The goal is to achieve plant establishment expeditiously to reduce erosion. The irrigation system for these landscaped areas will be monitored to reduce over irrigation and conserve water. Also, riprap will be placed at storm drain outfalls to reduce velocities.

Source Control BMPs: Source control BMPs will consist of measures to prevent polluted runoff. This program will include an educational component directed at each of the facility occupants. The facility occupants will receive a set of brochures developed by the County's Environmental Health Department.

Treatment Control BMPs: The treatment control BMPs will be a combination of volume and flow control measures. The measures to be implemented to address water quality will include:

- Grass lined drainage channels acting as Bio-Filters will be incorporated as a means to filter particulates and bio-absorb nutrient pollutants.
- Drainage will be routed through planters that will function as Bio-Filters as a means to filter particulates and bio-absorb nutrient pollutants.
- Infiltration or bio-retention basins will be incorporated to minimize parking lot runoff for design storm events.

The BMPs would ensure the proposed project would meet waste discharge requirements as required by the Land-Use Planning for New Development and Redevelopment Component of the San Diego Municipal Permit (SDRWQCB Order No. R9-2007-0001), as implemented by the San Diego County Jurisdictional Urban Runoff Management Program (JURMP) and Standard Urban Storm Water Mitigation Plan (SUSMP).

Construction activity subject to the Construction General Permit includes clearing, grading, and ground disturbance, such as stockpiling and excavation. These activities require BMPs designed to prevent pollutants from contacting stormwater and keep all products of erosion from moving off site into receiving waters. As such, Mitigation Measure **MM-WQ-1** and **MM-WQ-2** identified in the 2017 IS/MND would be applicable to reduce impacts to water quality to less-than-significant levels.

MM-WQ-1: During the Grading Plan and Improvement Plan Engineering for the proposed project, the applicant shall have qualified individuals as defined by the Storm Water Regional Control Board develop and implement a stormwater pollution prevention plan (SWPPP), which shall include and specify all construction BMPs designed to prevent pollutants from contacting stormwater and keep all products of erosion from moving off site into receiving water.

MM-WQ-2: A Major Stormwater Management Plan (SWMP) shall be prepared by the applicant in compliance with the County’s SUSMP. The SWMP shall demonstrate the proposed project has implemented LID design practices including (1) conservation of natural areas, soils, and vegetation; (2) minimizing disturbance to natural drainages; (3) minimizing and disconnecting impervious surfaces; (4) minimizing soil compaction; and (5) draining runoff from impervious to pervious areas. The SWMP shall show these LID design practices have been incorporated into the project design to the maximum extent feasible. Integrated management practices (IMPs) shall be used in conjunction within LID design concepts to treat runoff near its source using the

three basic elements: infiltration, retention/detention, and biofiltration. Infiltration IMPs include (1) bioretention areas, (2) bioretention swales, (3) permeable pavement, and (4) rock infiltration swales. Filtration IMPs include (1) flow-through planters, (2) vegetated roofs, and (3) sand filters. Volume-storage and reuse IMPs include cisterns and rain barrels. Connectivity IMPs include vegetated swales and vegetated filter (or buffer) strips. The SWMP shall detail the selection of structural IMP type and location based on site-specific precipitation patterns, soil characteristics, slopes, existing utilities, and any appropriate setbacks from buildings or other infrastructures. The SWMP shall also consider the pollutant categories likely to be generated by the proposed project, the water quality issues of receiving waters, and site constraints in selecting and locating LID design practices and IMPs.

Proper implementation of the BMPs and mitigation measures described above would reduce the potential for surface or water quality impacts on and off-site. Therefore, impacts to water quality and drainage would be less than significant with implementation of mitigation, consistent with the 2017 IS/MND.

Groundwater and Alternative Sewer Systems

The proposed project does not involve use of a groundwater supply. Furthermore, the proposed project does not involve the use of septic tanks or alternative sewer systems. The proposed project would connect to the Ramona Municipal Water District (RMWD) to meet water demands. According to RMWD's 2020 Urban Water Management Plan, the RMWD is 99 percent reliant on imported surface water from the Metropolitan Water District and the San Diego County Water Authority. RMWD owns three groundwater wells, none of which can provide potable water due to elevated nitrate concentrations (RMWD 2021). There would be no project-related impacts regarding groundwater. Therefore, impacts would be less than significant, consistent with the 2017 IS/MND.

XI. LAND USE AND PLANNING – Since the previous EIR was certified or previous MND was adopted, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause one or more effects to land use and planning including: physically divide an established community; and/or cause a significant environmental impact due to a conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect?

YES	NO
☐	☒

The 2017 IS/MND concluded the previous project would result in less than significant land use and planning impact with implementation of mitigation measure **MM-BIO-1**. The previous project identified that the portion of the northern parcels that is in closest proximity to the Santa Maria Creek is designated as Rural Lands, which allows for lands that act as natural buffers to both protect natural resources and preserve the environment. The previous project did not propose any structures in this area and included the implementation of mitigation for a 200-foot wetland buffer that would be implemented to preserve the existing natural buffer.

The proposed project differs from the previous project because the project footprint has been reduced from 14 acres in 2017 to 7.86 acres currently. Furthermore, as detailed in Table 2, the

proposed project would include the construction of 100 affordable senior housing units, a senior center, a PACE Wellness Center, and public park area, and would no longer include the previously proposed community gymnasium and teen café, childcare center, and community support center. Similar to the previous project, the proposed project would not include structures or development adjacent to the Santa Maria Creek.

Similar to the previous project, the proposed project would introduce new utilities infrastructure to the area. Curbs, gutters, and sidewalks would also be required along 12th Street and 13th Street (sidewalk pedestrian improvements along 13th Street are being proposed and analyzed as part of the 13th Street Bridge Project [SCH # 2021100070]). The proposed project would not significantly disrupt or divide an established community, as the project site is located on a vacant site adjacent to the Ramona Public Library.

Utilities would be required to serve the proposed residential building (which includes the senior center) and PACE Wellness Center; however, similar to the previous project, these utilities would be minor utility extensions to connect the project site to existing infrastructure and would not disrupt or divide library activities or the commercial and industrial activities of surrounding parcels in downtown Ramona.

Consistency with Land Use Policies

San Diego County General Plan

The previous project site was designated as Public/Semi-Public Facilities, Rural Commercial or Rural Lands per the County of San Diego General Plan land use designations (County of San Diego 2020). The southern parcels (281-182-13, 760-157-49-00, and 281-182-12-00) of the previous project site were designated as Public/Semi-Public Facilities, which allowed for major facilities to be built and maintained for public use including community service facilities. A portion of the two northern parcels (281-182-17 and 281-182-18) on the previous project site were designated high impact industrial, rural commercial, and rural lands, which allows small-scale commercial and civic development that encourages a wide variety of civic uses and community facilities. The previous community center would be allowable as a civic use and was concluded to be consistent with both land use designations.

The proposed project includes a Disposition and Development Agreement, minor use permit (ZAP), Boundary Adjustment, and a Density Bonus application to authorize a mixed-use development, consisting of affordable group residential housing for low-income seniors, a senior center, PACE Wellness Center, trail connectivity and recreational uses. Group residential uses dedicated to senior housing is not considered density under the zoning code. The proposed project would be located on two parcels (281-182-17 and 281-182-18) designated as Rural Commercial and Rural Lands (RL-20). Portions of the project site are zoned V4 General District, which allows for community recreation and group residential upon approval of a Minor Use Permit. The V4 General District is consistent with the Rural Commercial General Plan Land Use Designation and, therefore, the project is consistent with the General Plan upon approval of a Minor Use Permit. The northern portions of the project site consisting of existing open space around the Santa Maria Creek that will be retained are zoned as V2 Rural District and V1 Natural District. Both the V2 Rural District and V1 Natural District are consistent with the Rural Lands (RL-20) General Plan Land Use designation.

The following General Plan policies identified in the Housing Element are applicable to the proposed project:

- H-1.5 Senior and Affordable Housing near Shopping and Services. Provide opportunities for senior housing and affordable housing development within town centers, transit nodes, and other areas that offer access to shopping, amenities, and services.
- H-2.2 Projects with Open Space Amenities in Villages. Require new multi-family projects in Villages to be well-designed and include amenities and common open space areas that enhance overall quality of life.
- H-6.4 Affordable Housing on Suitable County-Owned Properties. Facilitate the development of affordable housing on suitable, County-owned surplus properties.

The proposed project includes the development of affordable housing for low-income seniors. In addition, the proposed project would include a senior center, a PACE Wellness Center, trail connectivity and recreational uses. As such, the proposed project would be consistent with these General Plan policies.

Ramona Community Plan and Form Based Code

Similar to the previous project, the proposed project site is subject to the policies of the Ramona Community Plan. The Ramona Community Plan envisions the proposed project as having community amenities for a variety of ages and interests for the citizens of Ramona. The project site is located in an area identified in the Ramona Community Pan as the Ramona Village Center. Within the Ramona Village Center Form Based Code, the project site is zoned V4 General District, which allows for community recreation and other civic amenities and the northern portion of the project site is zoned as V2 Rural District and V1 Natural District around the Santa Maria Creek. Both of these zones permit community recreation uses consistent with the proposed use.

The proposed project would be located within a smaller footprint, on two parcels (281-182-17 and 281-182-18), which are zoned as V1, V2, and V4. The proposed project would be compatible with the existing General Plan designations and zoning upon approval of a minor use permit (ZAP).

Ramona Village Center Design Guidelines

Upon approval of a minor use permit (ZAP), the proposed project would be consistent with both the current zoning and with the policies of the Ramona Community Plan. The proposed project would require an approval of a Site Plan pursuant to Community Design Review that requires that the project to be consistent with the Ramona Village Center Design Guidelines. The design review requires that the proposed project be consistent with the specific design guidelines for the property. The proposed project would utilize Density Bonus incentives/waivers to exempt the project from the Ramona Village Center Design Guidelines. Therefore, impacts would be less than significant, consistent with the 2017 IS/MND.

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

YES	NO
☐	☒

The 2017 IS/MND concluded no impacts on mineral resources would occur as a result of the previous project.

The proposed project differs from the previous project because the project footprint has been reduced from 14 acres in 2017 to 7.86 acres currently. Furthermore, as detailed in Table 2, the proposed project would include the construction of 100 affordable senior housing units, a senior center, a PACE Wellness Center, and public park area, and would no longer include the previously proposed community gymnasium and teen café, childcare center, and community support center.

According to the California Department of Conservation – Division of Mines and Geology, the project site is located in an area where geologic information indicates no significant mineral deposits are present (MRZ-1). The current project site is zoned V4 General District, V2 Rural District, and V1 Natural District. None of these zones are considered to be Extractive Use Zones (S-82) nor do they have an Impact Sensitive Land Use Designation (24) with an Extractive Land Use Overlay (25) (County of San Diego 2020). Furthermore, the current project site is surrounded by developed land uses including industrial, commercial, and residential, which are incompatible with future extraction of mineral resources on the project site. Implementation of the project would not result in the loss of availability of a known mineral resource and/or loss of locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan. Therefore, the proposed project would result in no impact on mineral resources, consistent with the 2017 IS/MND.

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

YES	NO
☐	☒

The 2017 IS/MND found that less-than-significant impacts on noise would result from the previous project and that the previous project would not expose people to potentially significant noise levels that exceed the allowable limits of the County of San Diego General Plan, County of San Diego Noise Ordinance.

The proposed project differs from the previous project because the project footprint has been reduced from 14 acres in 2017 to 7.86 acres currently. Furthermore, as detailed in Table 2, the proposed project would include the construction of 100 affordable senior housing units, a senior center, a PACE Wellness Center, and a public park area, and would no longer include the previously proposed community gymnasium and teen café, childcare center, and community support center. The proposed project would include an approximately 77,500 sf two-story residential building (which includes the 1,800 sf senior center) as well as a single-story building consisting of an approximately 5,000 sf PACE Wellness Center. The overall square footage of the proposed project would increase from the previous 2017 project by approximately 26,840 sf (from 65,160 sf proposed in 2017 to 92,000 sf proposed currently). Similar to the 2017 project, open space and recreational uses would be located in the northern and central portion of the project site. Unlike the 2017 project, the current project is no longer adjacent to SR 67 (Main Street).

The proposed project would not expose people to potentially significant noise levels that exceed the allowable limits of the County of San Diego General Plan, County of San Diego Noise Ordinance, and other applicable standards for the following reasons:

General Plan – Noise Element

The County of San Diego General Plan, Noise Element, Tables N-1 and N-2, addresses noise sensitive areas and requires an acoustical study to be prepared for any use that may expose noise sensitive areas to noise in excess of a Community Noise Equivalent Level (CNEL) of 60 decibels (dBA) for single residences (including senior housing, convalescent homes), and 65 dBA CNEL for multi-family residences (including mixed-use commercial/residential). Moreover, if the project is in excess of 60 dBA CNEL or 65 dBA CNEL, modifications must be made to the project to reduce noise levels. Noise sensitive areas include residences, hospitals, schools, libraries or similar facilities as mentioned within County of San Diego General Plan, Noise Element, Tables N-1 and N-2. Further, according to Tables N-1 and N-2, nursing homes, office/professional, medical, and commercial uses have an interior 50 dBA L_{eq} (one hour average) noise standard and residential uses have an interior 45 dBA CNEL noise standard, which accounts for exterior-to-interior noise reductions from physical barriers such as building walls, doors, and windows.

Future noise contours for roadways are presented in the County of San Diego General Plan, Noise Element, Figure N-2 for year 2030 conditions, which are derived from traffic data for the year 2030 developed for the Mobility Element of the General Plan. Based on a review of projected County noise contours, the 60 dBA CNEL and 65 dBA CNEL contours closely align with Main Street and 10th Street. The proposed project site is not located within the 60 dBA CNEL and 65 dBA CNEL contours. With respect to interior noise, typical wall assembly

construction would provide a 25 to 30 dBA noise reduction with windows closed.[7] Additional measures such as placement of windows, window and door upgrades, building material option upgrades could help further reduce noise. As part of the project design, the building would utilize an improved dual pane window design to provide further assurances of meeting the County Noise Element standards. Therefore, the proposed project would not expose people to potentially significant noise levels that exceed the allowable limits of the County of San Diego General Plan, Noise Element.

Noise Ordinance – Section 36.404

Non-transportation noise generated by the project is not expected to exceed the standards of the County of San Diego Noise Ordinance (Section 36.404) at or beyond the proposed project's property line. The proposed project would be located on two parcels, APNs 281-182-17 and 281-182-18. The proposed project site is located in the Paseo Sub-Area of the Ramona Village Center, which is an area identified in the Ramona Community Plan. The project site is zoned as V1 Natural District, V2 Rural District, and V4 General District, all three of which have a daytime one-hour average sound limit of 60 dBA.

The parcels adjacent to the east and west of the proposed project site are zoned as V1 Natural District, V2 Rural District, and V4 General District, all three of which have a daytime one-hour average sound limit of 60 dBA, which is the same as the proposed project site. The parcels adjacent to the south of the proposed project site are zoned as CD Civic District that has a daytime one-hour average sound limit of 60 dBA, which is the same as the proposed project site. The proposed project does not include noise producing equipment that would exceed applicable noise levels at the adjoining property line.

The parcels adjacent to the north of the proposed project site are zoned as M54 Industrial with a one-hour average sound limit of 70 dBA and A70 Agricultural with a daytime one-hour average sound limit of 50 dBA. The proposed project would include a public park located north of the proposed residential/senior center building and PACE Wellness Center, extending to the Santa Maria Creek. The proposed project would limit uses adjacent to the Santa Maria Creek floodway to the low-intensity recreational trail use. The proposed project does not include any structures or equipment within the Santa Maria Creek floodway (Zone AE). Furthermore, with respect to the community recreation uses, which requires approval of a Minor Use Permit, Noise Ordinance Section 36.417 exempts "sporting, entertainment and public events which are conducted pursuant to a license or permit issued by the County, within the scope of the license or permit." Therefore, the proposed project would not include uses, structures, or equipment near the parcels adjacent to the north of the proposed project site that would generate noise in excess of the County noise standards.

As detailed above, based on the project design and layout, County staff does not anticipate noise from the proposed residential/senior center building and PACE Wellness Center facility to exceed County noise standards. Additionally, the proposed project would be conditioned to

[7] With windows closed, the minimum exterior-to-interior noise attenuation for typical structures in California is approximately 25 to 30 dBA or potentially more with improved noise abatement materials or techniques. See: Gordon, C.G., W.J. Galloway, B.A. Kugler, and D.L. Nelson. NCHRP Report 117: Highway Noise: A Design Guide for Highway Engineers. Washington, D.C.: Transportation Research Board, National Research Council, 1971.

ensure that any substantial noise generating equipment and/or activities would comply with County noise standards.

Noise Ordinance – Section 36.408 and Section 36.409

The County of San Diego Municipal Code (County 2017) establishes prohibitions for disturbing, excessive, or offensive noise, and provisions such as sound level limits for the purpose of securing and promoting the public health, comfort, safety, peace, and quiet for its citizens (Chapter 4, Noise Abatement and Control). Section 36.408 of the County's Municipal Code prohibits construction between the hours of 7:00 P.M. and 7:00 A.M. Monday through Saturday, and at any time on Sunday or a holiday (i.e., construction is allowed Monday through Saturday between 7:00 A.M. to 7:00 P.M.). In addition, Section 36.409 of the County's Municipal Code sets a maximum noise level for construction equipment of 75 dBA for an eight-hour period $L_{eq}(8h)$), between 7:00 A.M. and 7:00 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.

Proposed construction equipment would include, but not be limited to, graders, excavators, tractors/loaders/backhoes, rubber-tired dozers, cranes, forklifts, generator sets, welders, pavers, paving equipment, rollers, and air compressors.

Project construction would generate noise from the daytime operation of construction equipment on the project site and from haul truck trips on local roadways accessing and departing the project site. Project construction would use small-scale construction equipment where construction activities would vary from day-to-day. As the project site is vacant, no demolition would occur onsite. In addition, no pile driving activities are anticipated. The construction activities associated with surficial grading would have the greatest potential to generate noise during construction; however, these activities would be conducted using small-scale construction equipment and would not occur continuously over the entire construction period.

According to the FHWA Roadway Construction Noise Model, which is based on a survey of heavy-duty construction equipment used for large scale projects, reference construction equipment noise levels for equipment such as an excavator, dump truck, forklift, and tractor/loader/backhoe range from an average of 69 to 77 dBA L_{eq} at a distance of 50 feet from the equipment, taking into account equipment usage factors. Since the proposed project is not a large-scale project and would use small-scale construction equipment, actual equipment noise levels would be less than the values listed above.

Individual pieces of construction equipment that would be used for construction of the proposed project produce maximum noise levels of 74 dBA to 85 dBA L_{max} at a reference distance of 50 feet from the noise source, as shown in **Table 9,** *Construction Equipment Noise Reference Levels and Usage Factors*. The construction equipment noise levels at 50 feet distance (Referenced Maximum Noise Levels) are based on the FHWA RCNM User's Guide, which is a technical report containing actual measured noise data for construction equipment (FHWA 2006). Table 9 also presents the percentage of time that each piece of construction equipment would be operating at full power (the "acoustical usage factor") for a 1-hour period, as well as the resulting noise levels at 50 feet from a sensitive receptor. Due to the use of small-scale construction equipment, the amount of noise generated during construction would be minimal and would dissipate as distance from the activity increased when construction equipment was located further away from the site boundaries. Therefore, while limited amounts of noise might

be perceivable at the residences near the site during certain construction activities, those construction activities would occur on an interval basis and would be intermittent throughout the day depending on the type of construction activity and distance from the site boundary.

Table 9
Construction Equipment Noise Reference Levels and Usage Factors

Type of Equipment	Acoustical Usage Factor[a] (%)	Reference Maximum Noise Levels at 50 Feet,[a,b] L_{max} (dBA)
Air Compressor	40	78
Backhoe	40	78
Crane	16	81
Dozer	40	82
Excavator	40	81
Forklift	20	75
Front End Loader	40	79
Generator	40	81
Grader	40	85
Paver	50	77
Paving Equipment	50	77
Roller	20	80
Tractor	40	84
Welder	40	74

[a] The usage factor is the percentage of time during a construction noise operation that a piece of construction is operating at full power.

[b] Construction equipment noise levels are based on the FHWA RCNM.

SOURCE: FHWA, Roadway Construction Noise Model User's Guide, 2006, Table 1.

Off-site sensitive land uses include Ramona Library located approximately 400 feet south of the project site, Calvary Church Ramona located approximately 400 feet to the southwest of the project site, Nickel Creek Townhomes located approximately 550 feet to the west of the project site, Valle Del Sol Apartments located approximately 650 feet to the southwest of the project site, and Peppertree Apartments located approximately 400 feet to the west of the project site. Noise impacts from project construction activities would be a function of the noise generated by construction equipment, the location of the equipment, the timing and duration of the noise-generating construction activities, and the relative distance to off-site noise-sensitive receptors.

The noise from construction equipment would generate both steady-state and episodic noise that could be heard within and adjacent to the proposed project site. Construction noise levels fluctuate throughout a given workday as construction equipment moves from one location to another within a project site. When construction equipment would be in use further away from a sensitive receptor location, construction noise levels would be lower than the calculated values provided in this analysis, which assumes construction equipment would be in use nearest to a sensitive receptor location. It is assumed that exposure to fluctuating construction noise levels would be lower than the noise levels shown in the analysis below.

Individual pieces of construction equipment that would be used for construction of the proposed project would produce maximum noise levels of 74 dBA to 85 dBA at a reference distance of 50 feet from the noise source, as shown in Table 8. These maximum noise levels would occur

when equipment is operating under full power conditions (i.e., the equipment engine at maximum speed). For a worst-case scenario, it is assumed that each piece of construction equipment would operate at the same time at a location that is nearest the off-site sensitive receptor at full power conditions. However, equipment used on construction sites typically operates under less than full power conditions.

Table 10, *Construction Noise*, provides the aggregate noise level from each piece of equipment provided in Table 9 operating in the same area over a 1-hour period, using the utilization factors also provided in Table 9, and the impact at 50 feet from a sensitive receptor. The construction noise calculation worksheet is provided in Appendix J of this document.

Table 10 presents the noise levels from individual and multiple pieces of equipment. The closest point of construction activities to the nearest noise-sensitive receivers would be approximately 400 feet to the south and southwest of the project site. The noise levels from the construction equipment to nearby sensitive receptors would be nominal given the distance between the construction activity area and existing ambient noise level.

Table 10
Construction Noise

Construction Phase (Equipment List)	Construction Equipment (Usage Factor / dBA L_{max}, at 50 feet)	Noise Level from Active Construction Area, dBA L_{eq}	
		Nearest Equipment at 50 feet	Nearest Equipment at 400 feet
Site Preparation (3 Rubber Tired Dozers, 4 Tractors/Loaders/Backhoes)	3 Dozer: 0.4 / 82 2 Tractor: 0.4 / 84 1 Loader: 0.4 / 79 1 Backhoe: 0.4 / 78	84	67
Grading/Excavation (Grader, Rubber Tired Dozer, Excavator, 3 Tractors/Loaders/Backhoes)	1 Grader: 0.4 / 85 1 Excavator: 0.4 / 81 1 Dozer: 0.4 / 82 2 Tractor: 0.4 / 84 1 Loader: 0.4 / 79 1 Backhoe: 0.4 / 78	84	67
Building Construction (Crane, 3 Forklifts, Generator Set, 3 Tractor/Loader/Backhoe, Welders)	1 Crane: 0.16 / 81 3 Forklift: 0.2 / 75 1 Generator: 0.5 / 81 2 Tractor: 0.4 / 84 1 Loader: 0.4 / 79 1 Backhoe: 0.4 / 78 1 Welder: 0.4 / 74	83	66
Paving (2 Pavers, 2 Paving Equipment, 2 Rollers)	4 Paver/Paving Equipment: 0.5 / 77 2 Roller: 0.2 / 80	77	61
Architectural Coating (Air Compressor)	1 Air Compressor: 0.4 / 78	74	56

SOURCE: ESA 2023. See Appendix J of this checklist for the noise calculation worksheet.

As shown in Table 10, noise levels associated with construction equipment in each construction phase would be approximately 67 dBA L_{eq}(1h) or lower at a distance of 400 feet, where the nearest

off-site noise-sensitive receivers would be located. Even if it is assumed that each equipment would be operating with the same utilization factor throughout the 8-hour construction day (L_{eq}(8h)), the noise level would be averaged to the same level of noise the same as the 1-hour average (L_{eq}(1h)). The nearest off-site sensitive receptors at 400 feet from the proposed project boundary would be exposed to construction noise levels of approximately 56 to 67 dBA L_{eq}(8h).

The proposed project site's range of construction noise levels would be below the County's 75 dBA L_{eq}(8h) noise threshold for construction activities that occur over an 8-hour period for all land use types (Section 36.409, Sound Level Limitations on Construction Equipment). Therefore, noise impacts resulting from construction related activities to the off-site sensitive (i.e., church, library, and residential) uses would be less than significant, consistent with the 2017 IS/MND.

The proposed project would not generate construction noise that may exceed the standards of the County of San Diego Noise Ordinance (Section 36.409). Construction activities would only occur during permitted hours of operation pursuant to Section 36.409. The proposed project would not have any outdoor noise-generating activities or sources, such as crowds or loud speakers. Therefore, no operational stationary source noise impacts are anticipated.

Based on the traffic projections, the proposed project would generate a total of 567 vehicle trips during weekdays and a maximum of 48 peak hour vehicle trips. The proposed project site is adjacent to Walnut Street, Maple Street/13th Street, and 12th Street and in proximity to Main Street. Walnut Street and Maple Street/13th Street are not thoroughfares and do not carry daily vehicle volumes of more than 10,000 average daily trips, which is generally equivalent to peak hour trips of approximately 1,000 trips or less.[8] Main Street (at 12th Street) carries approximately 25,780 average daily trips while 12th Street (at Main Street) carries approximately 537 average daily trips based on the 2015 Traffic Impact Analysis. Conservatively assuming a 1 percent increase in the daily traffic volume, the segment of Main Street near 12th Street would be estimated to carry approximately 27,916 average daily trips (approximately 2,792 peak hour trips) and the segment of 12th Street near Main Street would be estimated to carry approximately 581 average daily trips (approximately 58 peak hour trips) in 2023.[9] It takes doubling of the traffic volumes to increase the traffic noise by 3 dBA, assuming vehicle speed and other factors remain the same. The proposed project would have two vehicle access routes on Maple Street/13th Street and 12th Street. Assuming an even split using the two access routes, the proposed project would result in 284 vehicle trips during weekdays and a maximum of 24 peak hour vehicle trips accessing each route. , As a result, the proposed project would not result in the doubling of roadway traffic volumes and would not result in a noticeable increase in the traffic noise level on roadway segments in the project vicinity. Further, the proposed on-site residences would not be exposed to traffic noise levels exceeding the County's exterior noise standard of 65 dBA CNEL for residential uses. Therefore, no operational mobile source noise impacts are anticipated.

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8 The Federal Highway Administration had a general assumption that peak hour trips represent approximately 10 percent of daily trip volumes (the Federal Highway Administration considers 10 percent to be a standard assumption. See http://www.fhwa.dot.gov/planning/tmip/publications/other_reports/tod_modeling_procedures/ch02.cfm.

9 The Federal Highway Administration had a general assumption that peak hour trips represent approximately 10 percent of daily trip volumes (the Federal Highway Administration considers 10 percent to be a standard assumption. See http://www.fhwa.dot.gov/planning/tmip/publications/other_reports/tod_modeling_procedures/ch02.cfm.

As detailed in Table 2, the proposed project would include 100 affordable senior housing units, a senior center, a PACE Wellness Center, and a public park area, and would no longer include the previously proposed community gymnasium and teen café, childcare center, and community support center. The proposed public park area would include two pickleball courts and a tot lot, located adjacent to a multipurpose loop trail. The pickleball courts would be located within the interior portion of the project on the north side of the senior housing units, senior center, and PACE Wellness Center, and just over approximately 100 feet from the project's west boundary. Off-site sensitive land uses to the south and southwest of the project would not be exposed to noise from the pickleball courts since the intervening buildings (i.e., senior housing units, senior center, and PACE Wellness Center) would block pickleball noise transmission to the south. Off-site sensitive land uses to the west of the project would be located at least 500 feet away from the pickleball courts. Noise from a pickleball game would be generated by racquets hitting the balls and people talking/cheering. Data indicates noise from a pickleball game would be approximately 63 dBA Leq at three feet from the side of the pickleball net (Psomas 2021). Noise generated by the pickleball courts would be attenuated by the distance between the outdoor activities and the nearest private property line. At 500 feet (i.e., distance to the nearest off-site sensitive use), the noise level would be attenuated to less than 35 dBA Leq, which would not be audible above ambient noise levels. As such, noise generated by the project's pickleball courts would not result in a substantial permanent increase in ambient noise levels at the nearest noise-sensitive receptors. The proposed tot lot would generate less noise than the proposed pickleball courts since noise would only be generated by speech from parents and toddlers. At 500 feet (i.e., distance to the nearest off-site sensitive use), the noise level would be attenuated to less than that of the noise from pickleball games, which would also not be audible above ambient noise levels.

With respect to cumulative noise impacts, construction of the proposed project and the 13th Street Bridge Project [SCH# 2021100070] are anticipated to occur concurrently. The project's conformance to the County of San Diego General Plan (Noise Element) and County of San Diego Noise Ordinance (Section 36.404, 36.408, and 36.409) would ensure the proposed project would not create cumulatively considerable noise impacts, because the proposed project would not exceed the local noise standards for noise sensitive areas; and the proposed project would not exceed the applicable noise level limits at the property line or construction noise limits, derived from State regulation to address human health and quality of life concerns. Construction noise is generated by individual pieces of equipment and is considered point sources. Construction equipment noise affects localized areas in the immediate vicinity of each project site. Noise from point sources attenuates by 6 dBA per doubling of the distance from the noise source over acoustically hard or reflective surfaces (such as pavement or streets) and by 7.5 dBA per doubling of distance from the noise source over acoustically soft surfaces (such as vegetated lands). For the purposes of this analysis, while the project site consists of unpaved surfaces and vegetated lands, an attenuation rate of 6 dBA per doubling of distance is used to provide an environmentally conservative assessment. For example, using an attenuation rate of 6 dBA, at 200 feet, noise from a source would be reduced by 12 dBA when compared to a location that is 50 feet from the same source. The decibel scale is logarithmic; therefore, two sources of noise each generating the same noise level results in a combined noise level that is 3 dBA higher. Furthermore, when a noise source generates a noise level that is 10 dBA or more over other sources of noise dominates the total combined noise level and the noise from other sources would not add measurably to the overall composite noise level from all noise sources.

If the 13th Street Bridge Project would generate a maximum construction noise level equal to the County's 75 dBA L_{eq}(8h) noise threshold for construction activities at the proposed project's nearest sensitive receptor, the addition of the proposed project's maximum construction noise level of approximately 67 dBA L_{eq}(8h) would result in a composite noise level of approximately 75.6 dBA L_{eq}(8h). A change in ambient noise level of 1 dBA cannot be perceived by human hearing, except in carefully controlled laboratory experiments.[10] Therefore, if the 13th Street Bridge Project would generate a maximum construction noise level equal to the County's 75 dBA L_{eq}(8h) threshold, the proposed project would increase the composite noise level by 0.6 dBA, which would not be a perceivable difference by human hearing. Therefore, the perceived noise levels at sensitive land uses near the proposed project site would be similar whether or not the proposed project is constructed at the same time as the 13th Street Bridge Project. For this reason, the proposed project's incremental contributions to cumulative noise impacts would be less than cumulatively considerable and less than significant.

Similar to cumulative construction noise impact analysis, no significant cumulative noise impacts would occur from stationary noise sources on the project site and from other related projects in the project area.

In addition to the discussion on cumulative construction noise impacts and cumulative stationary noise source impacts above, there would be no significant cumulative traffic noise impact as a result of the implementation of the proposed project. Given that the project's pickleball courts would not generate noise that would be audible above ambient noise levels at off-site sensitive uses, the project's pickleball courts would not result in significant cumulative noise impacts.

Therefore, the proposed project would not contribute to a cumulatively considerable exposure of persons or generation of noise levels in excess of standards established in the local general plan, noise ordinance, and applicable standards of other agencies.

Ground-borne Vibration or Ground-borne Noise Levels

Typically, heavy-duty construction equipment used for demolition, earth-moving, and compaction for paving would generate localized vibration levels, which, depending upon distance, could potentially affect structures or annoy people. Similar to noise levels, vibration levels diminish with increasing distance away from the source (FTA, 2018). Project construction would use small-scale construction equipment over a 23-month period, where construction activities would vary from day-to-day and include clearing, grading, and landscaping.

All grading activities would be surficial. Due to the use of small-scale construction equipment, the amount of vibration generated during construction would be minimal and would dissipate as distance from the activity increased. Based on FTA data (FTA, 2018) large bulldozers would result in a vibration level of 87 VdB (0.089 in/sec PPV). Wheel loader would generate 86 VdB (0.076 in/sec PPV) at 25 feet. The nearest sensitive receivers in the project area are at least 400 feet from the project site, which would provide 36 VdB in vibration attenuation, compared to the vibration level experienced at 25 feet from the source. The distance attenuation alone would reduce the vibration level to 51 VdB or lower. Therefore, no vibration would be perceivable at

[10] Except in carefully controlled laboratory experiments, a change of 1 dBA in ambient noise levels cannot be perceived. Outside of the laboratory, a change of 3 dBA in ambient noise levels is considered to be a barely perceivable difference. See: California Department of Transportation, Technical Noise Supplement to the Traffic Noise Analysis Protocol, Section 2.2.1, 2013.

the nearest sensitive receivers, which are located approximately 400 feet from the proposed project site, during construction activities occurring at the closest project site boundary. In addition, construction activities would occur on a short-term basis and would be intermittent throughout the day depending on the distance from the site boundary. Construction equipment tend to move through a construction site area during a construction workday; therefore, construction vibrations would typically not be concentrated at a single location. Vibration generated by the proposed project would not be substantial enough to exceed applicable significance thresholds and would not cause structural damage due to the small construction equipment proposed for project construction.

Once construction is completed, the proposed project would have no potential to generate vibration during operation as the project would not introduce new sources of vibration to the project site relative to existing conditions. Operation of the project would not include any motorized or stationary mechanical equipment sources of vibration. Therefore, impacts related to vibration would be less than significant, consistent with the 2017 IS/MND.

The proposed project includes a residential/senior center building and a PACE Wellness Center where low ambient vibration is essential for interior operation and/or sleeping conditions. However, the facilities are setback more than 50 feet from any County Mobility Element (ME) roadway using rubber-tired vehicles with projected ground-borne noise or vibration contours of 38 VdB or less. A setback of over 50 feet from the roadway centerline for heavy-duty truck activities would ensure that these proposed uses or operations do not have any chance of being impacted significantly by ground-borne vibration or ground-borne noise levels (Harris, Miller, Miller and Hanson Inc., Transit Noise and Vibration Impact Assessment 1995, Rudy Hendriks, Transportation Related Earth-borne Vibrations 2002). This setback would ensure that the proposed project site will not be affected by any future projects that may support sources of ground-borne vibration or ground-borne noise related to the adjacent roadways. Also, the project does not propose any major, new or expanded infrastructure such as mass transit, highways or major roadways or intensive extractive industry that could generate excessive ground-borne vibration or ground-borne noise levels and impact vibration sensitive uses in the surrounding area. Therefore, the proposed project would not expose persons to or generate excessive ground-borne vibration or ground-borne noise levels. Impacts would be less than significant, consistent with the 2017 IS/MND.

Ambient Noise Levels

The proposed project involves the following permanent noise sources that may increase the ambient noise level: vehicle traffic, residential and recreational uses, and PACE Wellness Center/senior center related activities. As discussed above, the project would not expose existing or planned noise sensitive areas in the vicinity to a substantial permanent increase in noise levels that exceed the allowable limits of the County of San Diego General Plan, County of San Diego Noise Ordinance, and other applicable local, State, and Federal noise control. Also, the proposed project is not expected to expose existing or planned noise sensitive areas to direct noise impacts over existing ambient noise levels.

The proposed project does not involve any uses that may create substantial temporary or periodic increases in ambient noise levels in the project vicinity including but not limited to extractive industry; outdoor commercial or industrial uses that involve crushing, cutting, drilling, grinding, or blasting of raw materials; truck depots, transfer stations or delivery areas; or outdoor

sound systems. Also, no pile driving or jackhammer would be used and general construction noise is not expected to exceed the construction noise limits of the County of San Diego Noise Ordinance (Section 36.409), which are derived from State regulations to address human health and quality of life concerns. Construction activities would only occur during permitted hours of operation pursuant to Section 36.409. Also, it is not anticipated that construction equipment in excess of 75 dBA would operate for more than 8 hours during a 24-hour period. Therefore, the proposed project would not result in a substantial temporary or periodic increase in existing ambient noise levels in the project vicinity.

Airport Noise

The project site is located within two miles of the Ramona Airport, and is within Review Area 2 of the Ramona Airport Land Use Compatibility Plan (ALUC 2011). However, the project site is not within the 65 dBA CNEL impact zone of the airport. Additionally, the proposed project is not located within a two-mile vicinity of a private airstrip. Therefore, the proposed project will not expose people residing or working in the project area to excessive airport-related noise levels. Impacts would be less than significant, consistent with the 2017 IS/MND.

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

YES	NO
☐	☒

The 2017 IS/MND concluded that the previous project would result in less-than-significant impacts on population and housing.

The proposed project differs from the previous project because the project footprint has been reduced from 14 acres in 2017 to 7.86 acres currently. Furthermore, as detailed in Table 2, the proposed project would include the construction of 100 affordable senior housing units, a senior center, a PACE Wellness Center, and a public park area, and would no longer include the previously proposed community gymnasium and teen café, childcare center, and community support center. The proposed project includes the addition of affordable housing, which would potentially induce population growth in the area. According to San Diego Association of Governments (SANDAG) estimates, the Ramona CPA had an estimated 39,351 residents and 13,328 total housing units in 2020 (SANDAG 2021). The CPA’s labor force consisted of 6,929 jobs in 2020.

The proposed project would provide housing for approximately 115 elderly individuals (100 units, including 85 one-bedroom and 15 two-bedroom units). Senior home residents typically live within 3- to 5-miles of the senior living community, and it is likely the new residents currently reside within the CPA. However, for the purposes of this analysis it is conservatively assumed that the 115 residents are new residents in the CPA. An increase of 115 residents within the CPA would

represent a negligible increase (approximately 0.3 percent) in the existing population in the CPA, and would also represent approximately 0.25 percent of the CPA's projected 2050 population as presented in the jurisdictional growth forecasts in SANDAG's Series 13 Growth Forecasts (estimated to be 46,041 persons).[11,12]

Construction of the proposed project would require a total of 165 construction workers. However, construction employment within the project area is not anticipated to generate population growth within the region, as the need for workers would be accommodated within the existing and future labor market in the San Diego metropolitan area, which is highly dense and supports a diversity of construction firms and personnel. If construction workers live outside of the project area, these workers would likely commute during the temporary construction period, which is anticipated to be approximately 23 months. Therefore, construction of the project would not result in direct or indirect population growth.

Based on the SANDAG Series 13 Employment Forecast for the Ramona CPA, a total of 6,929 jobs were available within the Ramona CPA in the year 2020. Operation of the proposed project would result in up to 35 full- time employment opportunities. It is expected that the new positions would be filled by the local or regional labor pool and would not represent an indirect increase in population in the region or the Ramona CPA. However, for the purposes of this analysis, it is conservatively assumed that each employee and dependent family member would relocate to the CPA, the proposed project would introduce approximately 106 new residents to the Ramona CPA (using a persons per household rate of 3.02) (SANDAG 2021). This would result in a 0.27 percent increase from the current population estimation and 0.50 percent increase from the current workforce estimation.[13] An increase of 106 employees (and family) in the CPA would not represent a substantial increase (0.23 percent) in the existing population in the CPA and would represent a 0.44 percent increase of the CPA's 2050 employment of 7,962.[14]

Therefore, the proposed project would not induce substantial unplanned population growth in the area, either directly or indirectly. The proposed project would not displace any people or existing housing and so it would not displace any affordable housing or necessitate construction of replacement housing. Therefore, the proposed project would result in less-than-significant impacts on population and housing, consistent with the 2017 IS/MND.

XV. PUBLIC SERVICES – Since the previous EIR was certified or previous MND was adopted, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that result in one or more substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain

11 SANDAG Series 13 Estimates assume a total population of 39,351 in 2020. (115 persons / 39,351 persons *100 = .29%)

12 SANDAG Series 13 Estimates assume a total population of 46,041 persons in 2050. (115 persons / 46,041 persons *100 = .25%)

13 SANDAG Series 13 Estimates assume a total population of 39,351 in 2020. (106 persons / 39,351 persons *100 = .27%)
SANDAG Series 13 Estimates assume a current workforce of 6,929 within the Ramona CPA in 2020. (35 employees / 6,929 jobs *100 = .50%)

14 SANDAG Series 13 Estimates assume a total population of 46,041 persons in 2050. (106 persons / 46,041 persons *100 = .23%)
SANDAG Series 13 Estimates assume a total workforce population of 7,962 in 2050). (35 employees / 7,962 jobs *100 = .44%)

acceptable service ratios, response times or other performance objectives for any of the following public services: fire protection, police protection, schools, parks, or other public facilities?

YES	NO
☐	☒

The 2017 IS/MND concluded that the previous project would result in a less-than-significant impact on public services.

The proposed project differs from the previous project due to the reduced project footprint from 14 acres in 2017 to 7.86 acres currently. Furthermore, as detailed in Table 2, the proposed project would include the construction of 100 affordable senior housing units, a senior center, a PACE Wellness Center, and a public park area, and would no longer include the previously proposed community gymnasium and teen café, childcare center, and community support center.

The nearest fire station to the proposed project site is CALFIRE Ramona Station No. 80 located at 829 Vincente Road, approximately 0.6 miles (birds eye view) southeast of the current site. As indicated in the Safety Element of the County's General Plan, response times for development located within a Rural Village Boundary would be ten minutes (County of San Diego 2011). While the proposed project has different uses from the previous 2017 project, a Project Facility Availability – Fire Service Letter, dated June 9, 2023, was provided by the San Diego County Fire Protection District for the proposed project (located in Appendix I). The letter indicates that based on the capacity and capabilities of the District's existing and planned facilities, fire protection facilities are currently adequate or will be adequate to serve the proposed project. Additionally, the letter states that expected emergency travel time to the proposed project would be 2.5 minutes, well within the ten-minute response time standard. Similar to the 2017 IS/MND, the San Diego County Fire Protection District would still be able to adequately serve the project site for emergency fire services, and the project would not necessitate the construction of new or altered fire facilities.

The nearest police station to the proposed project site is the San Diego County Sheriff's Department Ramona Substation located at 1424 Montecito Road, approximately 0.25 miles from the current project site (birds eye view). The Ramona Substation patrols more than 150 square miles with a population of about 38,000 residents. The Substation is served by 27 deputies, three professional staff members, five sergeants, and a lieutenant. The Ramona Substation also includes a team of 28 Senior Volunteer Patrol members and 10 Mounted Patrol volunteers (SDCSD 2021). Similar to the previous project, the project site is contained in the San Diego County Sheriff's Department's service area, where police protection services are already being provided to the site. Because the site is already being served by the sheriff's department, project implementation would not expand the service area boundaries or increase the amount of urban land requiring police protection. Moreover, while the project would allow for a different type of land use on the project site compared to the previous project, the change in land use and new residential component, which include senior center uses and senior housing, is not anticipated to substantially increase calls for police protection services to the extent that necessitate the construction of new police facilities.

The proposed project would not introduce school aged-children to the site, therefore schools are not discussed. The project itself includes a public park component (including two pickleball

courts, a tot lot, and a multipurpose trail), and, as further detailed below in *Section XVI. – Recreation*, would reduce use of other nearby recreational facilities and would not require new or altered off-site recreational facilities due to implementation of the proposed project. The Ramona Branch Library, constructed in 2010, is located directly south of the project site. As discussed in the Ramona Community Plan, the Ramona Branch Library was originally conceptualized as a part of the RICC project and was intended to serve the RICC (and now the project site) as well as the community of Ramona (County of San Diego 2010). No new or altered library facilities would be required due to implementation of the proposed project.

The proposed project would not require the construction of new or physically altered governmental facilities including but not limited to fire protection facilities, sheriff facilities, schools, or parks in order to maintain acceptable service ratios, response times or other performance service ratios or objectives for any public services. Therefore, the proposed project would have less-than-significant impacts on public services or facilities, consistent with the 2017 IS/MND.

XVI. RECREATION – Since the previous EIR was certified or previous MND was adopted, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that result in an increase in the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated; and/or that include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

YES	NO
☐	☒

The 2017 IS/MND concluded that since the previous 2017 project included the development of recreational facilities itself, physical impacts associated with the construction of recreational facilities would be less than significant with the implementation of mitigation measures identified throughout the 2017 IS/MND.

The proposed project differs from the previous project because the project footprint has been reduced from 14 acres in 2017 to 7.86 acres currently. Furthermore, as detailed in Table 2, the proposed project would include the construction of 100 affordable senior housing units, a senior center, a PACE Wellness Center, and a public park area, and would no longer include the previously proposed community gymnasium and teen café, childcare center, and community support center. The proposed public park area would include two pickleball courts and a tot lot, located adjacent to a multipurpose loop trail. The multipurpose trail would be approximately 5,000 linear feet and six to eight feet wide. In the northern portion of the proposed public park area, south of Santa Maria Creek, the multipurpose trail would connect to a proposed extension of the Santa Maria Creek Greenway Trail, which would cross the project site in an east to west direction.

The estimated 115 senior residents at the project site would use the onsite recreational facilities, including the multipurpose trails, pickleball courts, and senior center. However, impacts associated with construction and operation of these recreational facilities are analyzed throughout this environmental checklist. Refer to the following sections of this environmental checklist for more information on potential physical environmental impacts resulting from

implementation of the proposed project: Biological Resources, Cultural Resources, Hazards and Hazardous Materials, Hydrology & Water Quality, Noise, and Transportation/Traffic. Although the project would directly increase population by providing new residences, recreational facilities would be provided onsite and would reduce use by project occupants of other nearby recreational facilities. With implementation of mitigation measures identified throughout this environmental checklist, the proposed project's impact on recreational facilities would be less than significant, consistent with the 2017 IS/MND.

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

YES	NO
☐	☒

The 2017 IS/MND concluded that the previous project would result in less-than-significant impacts with the implementation of mitigation. The required mitigation identified in the 2017 IS/MND, **MM-TRA-1**, was payment of a Traffic Impact Fee (TIF) to the County's TIF program. However, this determination was based on the level of service (LOS) and vehicle delay transportation performance metrics that are no longer used to determine the significance of a transportation impact (see discussion of CEQA Guidelines Section 15064.3, Subdivision (b), below).

Furthermore, all development projects that would generate new vehicle trips are subject to the County's TIF program by ordinance, meaning that CEQA mitigation requiring conformance with the ordinance would be redundant. Therefore, the proposed project would not be required to implement **MM-TRA-1** identified in the 2017 IS/MND.

The proposed project differs from the previous project because the project footprint has been reduced from 14 acres in 2017 to 7.86 acres currently. Furthermore, as detailed in Table 2, the proposed project would include the construction of 100 affordable senior housing units, a senior center, a PACE Wellness Center, and a public park area, and would no longer include the previously proposed community gymnasium and teen café, childcare center, and community support center. The proposed project differs from the previous project as the proposed project would generate fewer weekday daily and peak hour vehicle trips, as further detailed below. In addition, the regulatory setting for transportation/traffic has changed since certification of the 2017 IS/MND, which includes a required evaluation of a project's transportation impact in VMT. These project elements and the required VMT evaluation are described below.

Trip Generation

The proposed project would include the development of up to 100 affordable senior residential units, a 1,800 square-foot senior center and a 5,000 square-foot PACE Wellness Center. Both the senior center and the PACE Wellness Center would primarily serve the onsite residences but would also be open to the public. The proposed project would also include approximately 4.39 acres of open space (pickleball courts, a tot lot, and trails), which would be open to the public. As shown in **Table 11**, *Trip Generation Comparison*, these proposed uses would generate fewer daily, AM peak hour, and PM peak hour vehicle trips than the prior project land uses based on trip generation rates provided in the Institute of Transportation Engineers (ITE) Trip Generation Manual, 10th Edition.

Table 11
Trip Generation Comparison

Land Use	Daily	AM Peak Hour	PM Peak Hour
Proposed Project			
Senior Affordable Housing[1]	324	20	25
Senior Center[2]	52	3	5
PACE Wellness Center[3]	188	14	18
Open Space[4]	3	0	0
Total	*567*	*37*	*48*
Prior Project	2,204	134	179
Difference	*-1,637*	*-97*	*-131*

NOTES:

[1] ITE Land Use Code 252 – Senior Adult Housing (Attached)

[2] ITE Land Use Code 495 – Recreational Community Center

[3] ITE Land Use Code 630 – Medical Clinic

[4] ITE Land Use Code 411 – City Park

SOURCES: ITE Trip Generation Manual, 11th Edition, September 2021; LLG Traffic Impact Analysis, September 2015. ESA, 2023.

As shown in Table 11 above, vehicle trips generated by the proposed project would be less than one- half of the number that was estimated for the prior project. For this reason, the proposed project would not introduce any new or more severe traffic operations effects related to traffic volume relative to those identified for the prior project. Due to the substantial drop in vehicle trips during all three evaluated time periods (i.e., daily, AM peak hour, PM peak hour), traffic operation effects would be less severe than those identified for the previous project.

The Transportation Impact Analysis (TIA) for the prior project (Linscott Law & Greenspan Engineers, 2015) identified impacts to surrounding intersections, including a significant impact at the Main Street/12th Street intersection, which would be mitigated with the payment of fair share fees to the County's TIF through conformance with MM-TRA-1. As described above, the County's processes have evolved, and implementation of MM-TRA-1 is no longer required. Further, as demonstrated in Table 11, the proposed project would generate far fewer trips relative to the prior project and would have a substantially lessened impact on intersections in the project area. With respect to cumulative traffic operation conditions, one 60-unit residential project was identified as potentially contributing to cumulative traffic conditions at the time the traffic analysis for the prior project was conducted (in 2015). That project has since been

withdrawn, and eight current or proposed projects have been identified as potentially contributing to cumulative traffic conditions with the proposed project.[15] Given the reduction in vehicle trips generated by the proposed project, the project would have a lessened contribution to cumulative traffic relative to contributions identified for the previous project.

Project Access

Vehicular access to the proposed project's parking lot would be provided via two driveways: one located on the east side of the project site off of the cul-de-sac located at the northern terminus of 12th Street, and one located on the west side of the project site on 13th Street where it transitions to Maple Street. The previous project proposed a total of five driveways for project site access, including three on 13th Street and two on 12th street. By consolidating access to one location on 12th Street and one location on 13th Street, the proposed project would limit the potential conflict points where vehicles could interact with bicyclists or pedestrians using project area roadways. Since vehicular access to the project site would be provided via both 12th Street and 13th Streets, the trip distribution patterns assumed for the previous project, which also assumed access via these two roadways, would also apply to the proposed project. However, given the substantially lower number of vehicles generated by the proposed project in comparison to the previous project, impacts generated by project traffic on study area roadways would be less severe than those described in the 2017 IS/MND.

Pedestrian access would be provided along newly-constructed sidewalks on 13th Street adjacent to the project site, as well as improved sidewalks along 12th Street adjacent to the project site. A pedestrian connection to the existing Ramona Branch Library and site of a planned future RICC expansion (the certainty and timing of which is undetermined) would be located south of the project site. Although not specified for the previous project, it can be assumed that new and/or improved pedestrian facilities for the previous project would have met all applicable County requirements and, therefore, would have been similar to those facilities identified above for the proposed project. As such, no substantial change would occur for pedestrian access.

CEQA Guidelines Section 15064.3, Subdivision (b)

The 2017 IS/MND did not evaluate consistency with CEQA Guidelines Section 15064.3, Subdivision (b), as that criterion was introduced as part of the December 2018 update to the CEQA Guidelines, which occurred after the 2017 IS/MND was certified. The County published its Transportation Study Guidelines (TSG) in June 2020, which updated transportation significance thresholds and transportation impact analysis procedures in compliance with this new Statewide guidance and subsequently adopted an updated version of the TSG in September of 2022 (County of San Diego, 2022).

Section 3.3.1 of the TSG provides screening criteria for CEQA VMT analysis, which includes housing projects consisting of 100 percent affordable units, as meeting the County's screening criteria to be considered to have a less than significant VMT impact and are not required to prepare a detailed transportation VMT analysis (Page 23). The TSG follows OPR guidance, which presumes that affordable housing projects have less than significant impacts absent substantial evidence to the contrary. The residential component of the proposed project would

[15] Cumulative project list provided by County of San Diego Planning & Development Services Department. Cumulative projects are detailed below in Table 13.

be comprised of 100 percent affordable housing units which meets the County's standard for the project to be considered to have a less-less-than significant impact related to VMT per capita.

The proposed senior center and public park components of the proposed project also meet the screening criteria in the TSG, which considers public facilities that serve the surrounding community or public facilities that are passive use to have a less than significant VMT impact (Page 22). The proposed senior center and public park project components would be a locally utilized public amenity which would not be anticipated to be a regional attractant for vehicle trips and would have a less than significant impact related to VMT per capita.

As described above, each of the project components would meet County screening criteria to be considered to have a less than significant impact related to VMT. For this reason, the proposed project would not require the preparation of a detailed VMT study and would have a less than significant impact related to CEQA Guidelines Section 15064.3.

Therefore, the proposed project would result in a less-than-significant impact on transportation and traffic, consistent with the 2017 IS/MND.

XVIII. TRIBAL CULTURAL RESOURCES – Since the previous EIR was certified or previous MND was adopted, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources 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: listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or 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 Resources Code Section 5024.1?

YES	NO
☐	☒

Tribal cultural resource impacts is a new resource area that was added during the 2018 CEQA Guidelines update. Since AB 52 was not required in 2017, tribal consultation did not occur for the 2017 Project, and impacts to tribal cultural resources were not discussed in the 2017 IS/MND. However, the 2017 IS/MND considered impacts to archaeological resources and human remains in Section V, *Cultural Resources*. For informational purposes, tribal cultural resource impacts for the proposed Project have been analyzed in this checklist. The 2017 IS/MND determined that impacts to cultural resources would be less than significant with implementation of **MM-CUL-1**.

Pursuant to AB-52, notification letters were sent to the following nine tribal groups via email on December 28, 2021: the Barona Group of the Capitan Grande; the Campo Band of Mission Indians; the Iipay Nation of Santa Ysabel; Jamul Indian Village; the Kwaaymii Laguna Band of Mission Indians; the Manzanita Band of Kumeyaay Nation; the San Pasqual Band of Mission Indians; the Sycuan Band of the Kumeyaay Nation; and the Viejas Band of Kumeyaay Indians. Of the nine tribal groups notified, four responded to the notification letters requesting consultation

including: the Barona Group of the Capitan Grande; the Campo Band of Mission Indians; Jamul Indian Village; and the San Pasqual Band of Mission Indians.

On December 28, 2021, Art Bunce, attorney for the Barona Group of the Capitan Grande, requested to consult on the project. The County met with Mr. Bunce on August 18, 2022. As part of the meeting the County outlined mitigation measures requiring the presence of Native American monitors during project-related ground disturbing activities. In an email sent following the meeting, Mr. Bunce agreed to the outlined mitigation and concluded consultation on behalf of the Barona Group of the Capitan Grande.

Johnathan Mesa of the Campo Band of Mission Indians requested consultation pursuant to AB 52. The County scheduled a consultation meeting with Mr. Mesa for August 15, 2022, but Mr. Mesa did not attend the meeting. The County followed-up with Mr. Mesa via email on August 15 and 18, and September 7 to re-schedule. Mr. Mesa did not respond, and the County concluded consultation efforts with the Campo Band of Mission Indians.

On January 3, 2022, Lisa K. Cumper, Tribal Historic Preservation Officer for the Jamul Indian Village requested consultation pursuant to AB 52. In an email dated June 28, 2022, Ms. Cumper indicated that upon researching the project, she chose to conclude consultation of behalf of the Jamul Indian Village. Ms. Cumper did not provide recommendations regarding mitigation measures.

On December 29, 2021, Angelina Gutierrez, Tribal Historic Preservation Officer for the San Pasqual Band of Mission Indians requested to consult on the project. On August 23, 2022 the County met with Ms. Guiterrez and Desiree Morales-Whitman, Environmental Manger for the San Pasqual Band of Mission Indians. As part of the consultation, Ms. Guiterrez and Ms. Morales-Whitment requested a Native American monitor associated with the San Pasqual Band of Mission Indians be present during project-related ground disturbing activities. In an email dated September 7, 2022 the County stated that mitigation will be included requiring that a Kumeyaay tribal monitor be retained during project ground disturbance, and requested conclusion of AB 52 consultation. In a follow-up email dated October 7, the County requested conclusion of the AB 52 consultation process. To date, the County has received no additional response from the San Pasqual Band of Mission Indians.

As outlined in *Section V. – Cultural Resources*, Mitigation Measure **MM-CUL-1** outlined in the 2017 IS/MND would be implemented. The mitigation measure requires an archaeological and Native American monitoring program to be implemented during project-related ground disturbing activities. This mitigation measure fulfills the requests for the presence of a Native American monitor made by the Barona Group of the Capitan Grande and the San Pasqual Band of Mission Indians. Therefore, the proposed project would result in a less-than-significant impact related to tribal cultural resources.

XIX. UTILITIES AND SERVICE SYSTEMS – Since the previous EIR was certified or previous MND was adopted, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that cause effects to utilities and service systems including: require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects; have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years; 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; 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; or comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

YES	NO
☐	☒

The 2017 IS/MND concluded that impacts on utilities would be less than significant with the implementation of mitigation for potential impacts related to the construction of new storm water drainage facilities or expansion of existing facilities.

The proposed project differs from the previous project because the project footprint has been reduced from 14 acres in 2017 to 7.86 acres currently. Furthermore, as detailed in Table 2, the proposed project would include the construction of 100 affordable senior housing units, a senior center, a PACE Wellness Center, and a public park area, and would no longer include the previously proposed community gymnasium and teen café, childcare center, and community support center.

Water

The Ramona Municipal Water District's (RMWD) boundary encompasses a total of 45,796 acres (72 square miles). The RMWD service area is within the Ramona CPA. The RMWD relies on the Metropolitan Water District (MWD) and the San Diego County Water Authority (CWA) to provide a reliable supply of imported water to the region. The RMWD purchases untreated and treated water from CWA and has in the past produced treated water at the Bargar Water Treatment Plant using untreated water from Lake Sutherland. This water is purchased from the City of San Diego.

In 2020, RMWD supplied 5,358 acre-feet (AF) to its customers, including 4,747 AF of potable water and 611 AF of recycled water. RMWD projects a total demand of approximately 5,268 AF of potable water and approximately 520 AF of recycled water by 2040 (RMWD 2021). This results in a 10.4 percent increase for potable water demand by 2040 and 16 percent decreased demand of recycled water by 2040. RMWD projects that by 2040, normal year water supplies from CWA and MWD would be approximately 6,535 AF, which would be able to accommodate the future demand of 5,788 AF (RMWD 2021).

Existing recycled water facilities for the Santa Maria Wastewater Service Area consist of a tertiary treatment plant and a transmission main to a single end user. Reclaimed water is currently produced at the Tertiary Treatment Plant at Rangeland Road. The tertiary plant has an influent capacity of 0.360 mgd with an effluent capacity of 0.342 mgd. Recycled water is conveyed from the Rangeland Road Tertiary Treatment Plant to the Mount Woodson Golf Course. Mount Woodson Golf course is presently the sole end user of recycled water in the Santa Maria Wastewater Service Area (County of San Diego 2010).

Similar to the previous project, the proposed project would connect to existing municipal water lines that would connect to RMWD pipelines for water service. No off-site infrastructure would be

required to implement the proposed project. The project would be served by the RMWD potable water system. As noted above, the RMWD 2020 Urban Water Master Plan (UWMP) potable water identified that 4,747 AF of potable water was supplied in 2020. The proposed project site is within the RMWD's Service Area and as such, the proposed water demand is accounted for in the UWMP's projections. The UWMP forecasts a surplus of water under 2040 conditions and, therefore, adequate water supply would be available. While the proposed project has different uses from the 2017 project (as detailed in Table 2), a Project Facility Availability - Water Service Letter, dated August 16, 2023, was provided by the RMWD for the proposed project (Appendix K). The letter indicates that water facilities to serve the project are expected to be available for the project with adherence to certain conditions, including a water system evaluation that would be required to be prepared with final design of the project, in compliance with existing local regulations. Based on RMWD's Project Facility Availability - Water Service Letter and compliance with local regulations, the RMWD would have sufficient water supply for the proposed project in normal, dry, and multiple dry years. Therefore, impacts would be less than significant, consistent with the 2017 IS/MND.

Wastewater

The RMWD is within the Ramona Planning Area and is responsible for sewage disposal within approximately 90 percent of the Ramona Community Planning Area. The RMWD has four sewer service boundaries, the "Latent Powers Area" (LPA), the "Activated Sewer Powers Areas" (ASPA), and two sewer service areas. The RMWD is authorized by LAFCO to provide sewer service in the ASPA and the two sewer service areas in the ASPAs are; the San Vicente Sewer Service Area (SVSSA) serving the San Diego Country Estates area, and the Santa Maria Sewer Service Area (SMSSA), which provides sewer service to an area of approximately 2,634 acres, in and around the Ramona Town Center, including the project site and the Mt. Woodson Community.

A larger area of the Ramona Area referred to as the Activated Sewer Powers Area (ASPA) of approximately 6,989 acres may also receive sewer service. The Santa Maria Water Reclamation Plant (SMWRP) is permitted to process up to one million gallons of wastewater per day. According to the 2020 UWMP, SMWRP treated 763 AF, and has an influent capacity of 0.360 mgd with an effluent capacity of 0.342 mgd. In 2020, all RMWD wastewater plants, treated 1,334 AF of wastewater.

Similar to the previous project, the proposed project would connect to existing sewer lines that would connect to RMWD pipelines for sewer service. While the proposed project has different uses from the 2017 project (as detailed in Table 2), a Project Facility Availability - Sewer Service Letter, dated August 16, 2023, was provided by the RMWD for the proposed project (Appendix L). The letter indicates that sewer facilities to serve the project are expected to be available for the project with adherence to certain conditions, including a sewer system evaluation that would be required to be prepared with final design of the project, in compliance with existing local regulations. Based on RMWD's Project Facility Availability - Sewer Service Letter and compliance with local regulations, the RMWD would have sufficient sewer service for the proposed project. Therefore, impacts would be less than significant, consistent with the 2017 IS/MND.

Solid Waste

Similar to the previous project, implementation of the proposed project would generate solid waste. All solid waste facilities, including landfills require solid waste facility permits to operate. As of 2020, in San Diego County there were 12 active County-maintained landfills and transfer stations (DPW 2020). The nearest landfill to the project site is the Sycamore Landfill, which is a Class III disposal site with a remaining capacity of 113,972,637 cubic yards with a cease operation date of 2042 (CalRecycle 2021).

Construction of the proposed project would be required to comply with the County's Construction and Demolition (C&D) Ordinance, which requires all projects within unincorporated San Diego County to recycle 65 percent of all materials, including 90 percent of inert materials, such as concrete, asphalt and dirt (DPW 2021).

Operation of the proposed project would generate approximately 2,130 pounds or 1.26 cubic yards of solid waste per day, as shown in **Table 12**, *Solid Waste Generation*. This would represent a negligible percentage of Sycamore Landfill's remaining capacity.

Although the proposed project would generate solid waste, the Sycamore Landfill has sufficient remaining capacity to support the proposed project. Furthermore, the proposed project would be required to comply with the County's C&D Ordinance, which would reduce construction-related impacts. Impacts would be less than significant, consistent with the 2017 IS/MND.

Table 12
Solid Waste Generation

Land Use	Demand Factor	Project Demand	Total Demand
Residential	12lbs/person/day	115 persons	1,380lbs/day
Nursing/Retirement Home	5lbs/person/day	150 persons[2]	750lbs/day
Total			**2,130 lbs/day**

[1] Nursing/Retirement Home to be used for the senior center and PACE Wellness Center

[2] Total demand conservatively assumes 35 employees plus 115 residents.

SOURCE: Factors provided by CalRecycle: https://www2.calrecycle.ca.gov/wastecharacterization/general/rates

Storm Water Drainage

As discussed above in *Section X. - Hydrology and Water Quality*, implementation of BMPs and mitigation measures MM-WQ-1 and MM-WQ-2 would ensure that the proposed project would be designed so that runoff rates are controlled to maintain or reduce downstream erosion conditions and reduce the potential for water quality impacts. Similar to the previous project, compliance with the County's RPO and applicable standards would require peak flow rates and volumes for both pre- and post-project conditions to be determined, and the site's drainage design to be engineered to convey such flows. This would include adequately sizing stormwater conveyances, including drainage features. Similar to the previous project, with implementation of **MM-HYD-1**, the Developer shall prepare a hydrology and drainage study in accordance with guidance contained within the San Diego County Hydrology Manual. The study would delineate drainage areas, describe pre- and post-cover conditions (including impervious areas), specify design storm events, and compare pre- versus post-project stormwater runoff rates and volumes. The study would require the project to comply with applicable County codes, including

the County of San Diego Flood Damage Prevention Ordinance and the County's RPO. Therefore, if new stormwater facilities are determined to be necessary for the proposed project, they would be constructed in a manner that would not cause significant environmental effects due to compliance with applicable standards. Impacts would be less than significant with implementation of mitigation, consistent with the 2017 IS/MND.

MM-HYD-1: Prior to project approval, the applicant shall prepare a hydrology and drainage study in accordance with the guidance contained within the San Diego County Hydrology Manual. The study shall delineate drainage areas, describe pre- and post-project cover conditions (including impervious areas), specify design storm events, and compare pre- versus post-project stormwater runoff rates and volumes. The study shall comply with applicable County codes, including the County of San Diego Flood Damage Prevention Ordinance, the County's RPO, and Board of Supervisors Policy I-68. The study shall detail the necessary drainage design to ensure the health and safety of project site occupants and to avoid adverse impacts to off-site properties and Santa Maria Creek.

XX. WILDFIRE – Since the previous EIR was certified or previous MND was adopted, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that result in one or more effects related to environmental effects associated with wildfire including substantially impair an adopted emergency response plan or emergency evacuation plan; due to slope, prevailing winds, and other factors, exacerbate wildfire risks of, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire; 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 on the environment; 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.

YES	NO
☐	☒

The 2017 IS/MND did not include a wildfire analysis as it was not required by CEQA at that time. While CEQA does not require the analysis of environmental impacts that were not previously evaluated in the 2017 IS/MND, an analysis of potential wildfire impacts associated with the proposed project have been included for informational purposes only.

The majority of San Diego County is included in a State Responsibility Area (SRA) for fire prevention and suppression. Fire Hazard Severity Zones (FHSZs) also include the classification Very High Fire Hazard Severity Zone (VHFHSZ) in areas where local agencies are responsible for fire protection (Local Responsibility Areas). The proposed project site is identified as a VHFHSZ in a Local Responsible Area (LRA) (CALFIRE 2009); therefore, the potential for risk of wildfire at the project site would be considered high, where impacts would be considered significant.

Construction of the proposed project would include grading, building, and paving activities, which would introduce new flammable building material and personnel within the project site. However, construction would occur over 23 months and would be temporary in nature where all flammable

building materials would be finished in accordance with architectural requirements and the County's Fire Code. The proposed project site does not include any steep slopes and construction of the proposed project would not exacerbate conditions such as slope instability that would result in downslope or downstream flooding or landslides, or other significant risks. For this reason, the risk of wildfire during construction would not substantially change from existing conditions. Nevertheless, the proposed project would still implement fire safety protocols and plans typical during construction to decrease the risk of wildfire.

Operation of the proposed project would introduce new conditions that could exacerbate wildfire risk at the project site by adding 115 new senior residents, new employees, and buildings and recreational features onsite. While development of the project would reduce fuel load on the project site by developing natural habitat with built environment, operation of the project would introduce visitors to the project site that were not previously present. Given the high percentage of wildfires in Southern California that are ignited by human-related causes, this could exacerbate the existing wildfire risks onsite.

As a part of the project entitlement process, proposed projects are reviewed by County Fire Services staff (i.e., County Fire Marshall) to ensure onsite access is accessible for emergency vehicles and onsite utilities are sufficient for emergency response. In addition, County Fire staff also review the building plans to certify that all fire suppressant equipment and features are adequate in accordance with all applicable fire codes, including the 2020 County Fire Code. For example, the proposed project would be required to comply with County Code of Regulatory Ordinances, Title 3, Division 5, Chapter 3, and Appendix II-A of the Uniform Fire Code for all proposed buildings. Similarly, County DPR would be required to comply with the Defensible Space for Fire Protection Ordinance (2011) for all recreational features, including the park and multipurpose trails. The ordinance requires combustible vegetation; dead, dying, or diseased trees; green waste; rubbish; or other flammable materials to be cleared within 30 feet of the property line and 10 feet of each side of a highway, private road, or driveway in order to maintain defensible space (County of San Diego 2011c). The proposed project is also required to comply with the County of San Diego Fire Service Conditions stipulated by the County Fire Services staff (i.e., County Fire Marshall) upon review and approval of the project. Therefore, the proposed project would be compliant with all applicable fire codes and regulations as determined by the County Fire staff, which would reduce severity of the risk of wildfire at the project site.

In combination with the fire code and regulation compliance, the proposed project would also provide adequate emergency response to the project site. As detailed above in *Section IX. – Hazards and Hazardous Materials* and *Section XV. – Public Services*, a Project Facility Availability - Fire Service Letter, dated June 9, 2023, was provided by the San Diego County Fire Protection District (located in Appendix I). The letter indicates that based on the capacity and capabilities of the District's existing and planned facilities, fire protection facilities are currently adequate or will be adequate to serve the proposed project. Additionally, the letter states that expected emergency travel time to the proposed project would be 2.5 minutes, well within the ten-minute response time guideline for the District. Similar to the 2017 IS/MND, the San Diego Fire Protection District would still be able to adequately serve the project site for emergency fire services with the development of the proposed project. Additionally, the proposed project would comply with the applicable requirements set forth by the *County of San Diego Multi-Jurisdictional Hazard Mitigation Plan* and the *Operational Area Emergency Operations Plan* during an emergency. Therefore, with service provided by the San Diego County Fire Protection District

and adherence to the local emergency plans, the proposed project would operate sufficiently during a wildfire emergency, which would reduce severity of impacts associated with wildfire at the project site.

Since the proposed project would comply with PRC 4291, the Defensible Space for Fire Protection Ordinance, all applicable CBC and CFC requirements for development in a VHFHSZ, and the *Operational Area Emergency Operations Plan*, the potential to exacerbate wildfire risk onsite would be reduced. The presence and ongoing maintenance of infrastructure on the proposed project site would not introduce any specific conditions that would result in exacerbation of wildfire risk any more than operation of the rest of the project facilities. There would be no steep slopes on the project site and the proposed project would not exacerbate conditions such as slope instability that would result in downslope or downstream flooding or landslides, or other significant risks. Therefore, the proposed project would result in less than significant wildfire impacts.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE: Since the previous EIR was certified or previous MND was adopted, are there any changes in the project, changes in circumstances under which the project is undertaken and/or "new information of substantial importance" that result in any mandatory finding of significance listed below?

Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, 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?

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

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

YES	NO
☐	☒

The 2017 IS/MND found that less-than-significant impacts with implementation of mitigation on Mandatory Findings of Significance would result from the previous project.

The proposed project differs from the previous project because the project footprint has been reduced from 14 acres in 2017 to 7.86 acres currently. Furthermore, as detailed in Table 2, the proposed project would include the construction of 100 affordable senior housing units, a senior center, a PACE Wellness Center, and a public park area, and would no longer include the previously proposed community gymnasium and teen café, childcare center, and community support center.

The potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory were considered in the response to each question in *Section IV. – Biological Resources* and *Section V. – Cultural Resources* of this IS/MND. However, mitigation has been included to reduce these effects to a level below significance. This mitigation includes **MM-BIO-1** through **MM-BIO-8**, which consists of: the preparation of a southern tarplant mitigation plan; conducting all construction outside of the bird nesting season; conducting all construction outside of the special-status bat maternity roosting season; pre-construction surveys of all suitable habitat for the presence of special-status wildlife; preparation of a manure management plan; and purchasing credits at a County-approved mitigation bank and/or preparation of a revegetation plan. In addition, with incorporation of **MM-CUL-1,** potential impacts to cultural and tribal cultural resources would be reduced to a less than significant level. Therefore, similar to the previous project, with implementation of mitigation measures, the proposed project would not substantially degrade the quality of the environment, reduce the habitat or population of fish or wildlife, threaten to eliminate a plant or animal community, or eliminate important examples of the major periods of California history or prehistory.

A cumulative impact would occur if the proposed project would result in an incrementally considerable contribution to a significant cumulative impact in consideration of past, present, and reasonably foreseeable projects for each resource area. One 60-unit residential project was identified in the 2017 IS/MND as potentially contributing to cumulative conditions at the time the prior project was analyzed. That project has since been withdrawn, and nine past, present, and reasonably foreseeable projects have been identified as potentially contributing to cumulative conditions with the proposed project, detailed below in **Table 13***, Cumulative Projects*. The Ramona Community Resource Center is currently under construction and is anticipated to be completed prior to the beginning of construction of the proposed project, and as such, is included as part of this cumulative analysis.

There are a number of environmental issue areas for which the proposed project would have no impact. These issues include agriculture and forestry resources and mineral resources. For these issue areas, as the proposed project would have no impact, the proposed project would also not contribute to a cumulatively significant impact. The proposed project would result in less than significant impacts to aesthetics, air quality, energy, geology and soils, GHG emissions, land use, noise, public services, recreation, transportation, and wildfire. Cumulative analyses are provided in greater detail above within *Section III. – Air Quality*, *Section XIII. – Noise*, and *Section XVII – Transportation,* which conclude less than significant cumulative impacts for these resource areas. GHG emissions are exclusively cumulative impacts; there are no non-cumulative GHG emission impacts from a climate change perspective, and therefore the cumulative analysis of GHG emissions is provided above in *Section VIII – Greenhouse Gas Emissions*. For issue areas that are location specific including aesthetics, geology and soils, land use, and wildfire, the location of the project would not contribute to a cumulatively significant impact due to the geographic extent of the project site. Additionally, all past, present, and future projects would be required to dedicate land or pay into County fee structures as applicable to provide recreational facilities and public services; thus there would be a less than significant cumulative impact for these resources. The proposed project could contribute to cumulatively

significant impacts when considered with other past, present, or reasonably foreseeable future projects for resource areas in which a potentially significant impact has been identified. However, with implementation of mitigation measures **MM-BIO-1** through **MM-BIO-8**, **MM-CUL-1**, **MM-HAZ-2** through **MM-HAZ-5**, **MM-WQ-1** through **MM-WQ-2**, and **MM-HYD-1**, the proposed project's impacts would be reduced to a less than significant level and would not contribute to cumulatively significant impact. Additionally, impacts to biological resources, cultural resources, hydrology and water quality, and hazardous materials as a result of construction activities would be short term and limited by construction periods during construction of the proposed project and cumulative projects. Further, similar to the proposed project, all the past, present, and future projects would be required to comply with all relevant and applicable federal, state, and local laws and regulations. Therefore, similar to the 2017 IS/MND, with the implementation of mitigation measures, the proposed project would not result in an incrementally considerable contribution to a significant cumulative impact. Therefore, similar to the previous project, with implementation of mitigation measures, the proposed project would not result in environmental effects, which will cause substantial adverse effects on human beings, and would not contribute to impacts that are cumulatively considerable.

Table 13
Cumulative Projects

Project Name	Address	Description	Status
Village Place Apartments	N/A	28 dwelling unit apartment complex	Grading permit issued
Ramona Paving Construction Yard	1255 Olive Street, Ramona, CA 92065	2,150CY Cut/2,150CY Fill for an equipment storage and parking facility on 2.39 acres	Ongoing
Creekside at Village Walk 40 Lot Tentative Map	N/A	40 unit condominium complex on 5.5 acres. Involves 4,950 cubic yards of cut, 22750 cubic yards of fill, and 17,800 cubic yards of import	Ongoing
Grading - Commercial Office	405 Ramona Street, Ramona, CA 92065	Grading and construction of a 5,400 sf commercial office space and two-unit residential complex	Ongoing
Village Walk Town Homes	1869 La Brea Street, Ramona CA 92065	14 Unit Townhomes with a residential park	Ongoing
McDonald's Restaurant	1550 Main Street, Ramona, CA 92065	Rebuild of a 3,571 sf McDonalds after a fire	In review
Ludwick Tentative Parcel Map	1512 Walnut Street, Ramona, CA 92065	3 Lot Tentative Parcel Map on 4.22 acres	Out to applicant
13th Street Bridge Project	N/A	New vehicular bridge spanning the Santa Maria Creek, and roadway and pathway improvements to 13th Street and Willow Road	In review
Ramona Community Resource Center	North of Main Street between 12th and 13th Street	7,500 sf public health services building	Under construction. Construction is anticipated to be completed prior to construction of the proposed project.

SOURCE: County of San Diego Planning & Development Services, July 2023

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