Appendix A 2017 Final IS/MND

FINAL

Initial Study/Mitigated Negative Declaration for the Ramona Intergenerational Community Campus Project (SCH# 2016121008) Ramona, California

Prepared for:

County of San Diego

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This Final Initial Study/Mitigated Negative Declaration (IS/MND) consists of three sections:

- 1. **Preface to the Final Mitigated Negative Declaration.** The Preface summarizes the Final IS/MND process and Final IS/MND contents.
- 2. Ramona Intergenerational Community Campus Project Final IS/MND Errata.
- 3. **Responses to Comments on the Draft MND.** This section addresses comments on the Draft IS/MND raised during the public review period. Each comment letter has been scanned and individual comments bracketed. Responses for the each of the individual comments in each of the comment letters have been prepared.

PREFACE TO THE FINAL INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

Conforming to the California Environmental Quality Act (CEQA) Guidelines, Section 15070 and Section 15071, the County of San Diego (County) prepared an IS/MND for the construction of the Ramona Intergenerational Community Campus Project (project), which includes the following components:

Main Project Site

The main project site is situated within the unincorporated community of Ramona, California, which is located in central San Diego County at the intersection of State Route 67 (Main Street) and CA-78. The main project site is approximately 14 acres in size and is bounded by Main Street to the south, Santa Maria Creek and Walnut Street to the north, 12th Street to the east, and 13th Street to the west. The new Ramona Branch Library borders the main project site to the southwest. The southeastern portion of the main project site includes two 0.69-acre parcels currently owned by Caltrans (APN #281-191-03 and APN #281-191-02). These parcels were formerly operated as a Caltrans vehicle service and maintenance yard and currently contain a former sea cargo container and no other structures. The rest of the main project site includes five vacant parcels that are located to the north of the Caltrans parcels and the Ramona Public Library. Three of these parcels are owned by the County (APN #281-182-13, APN #281-182-12, and APN #760-157-49) and two of the parcels are privately owned (APN #281-182-18, and APN #281-182-17). Future development of the site would require acquisition of these parcels but is not included as part of this project.

Replacement Parcels

The County of San Diego proposes to acquire the two Caltrans parcels in exchange for two replacement parcels that the County is currently under an option agreement to purchase. The first replacement parcel is a 0.5-acre parcel that is located approximately 900 feet north of the main project site in the community of Ramona (APN #281-122-18). This parcel currently contains a lumber operation that will be removed prior to Caltrans taking ownership of the replacement parcel

and the County taking ownership of the Caltrans parcel. The parcel will then be improved for staging as needed during major events and the temporarily storage of Caltrans equipment and roadway materials (Class II base, rock, sand, guardrail, asphalt, etc.).

The second replacement parcel is a 0.65-acre parcel that is located approximately 12 miles east of the main project site in the unincorporated community of Julian (APN #291-122-18). This parcel is currently vacant and will be improved for Caltrans staging and storage purposes including the construction of a 1,600 square foot storage barn for dry sand and cinders.

Upon the acquisition of the Caltrans parcels, the main project site would be developed as the Ramona Intergenerational Community Campus that includes the following facilities: 1) 12,500 square-foot senior facility; 2) 5,000 square-foot adult day care center; 3) 14,000 square-foot community gymnasium and teen café; 4) 20,000 square-foot childcare center; 5) 10,000 square-foot family resource center; 6) 3,660 square-foot community support center; 7) approximately 230 parking spaces; and 8) various infrastructure improvements to support the new facilities.

The main project site is subject to the County's Ramona Community Plan Area. The Ramona Community Plan Area designates the parcels that make up the main project site as Public/Semi-Public Facilities, Rural Commercial or Rural Lands. The Ramona Community Plan also designates the Ramona replacement parcel as High Impact Industrial. The Julian replacement parcel is subject to the County of San Diego's Julian Community Planning Area, which designates the parcel as Medium Impact Industrial.

The main 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 parcels of the main project site are zoned as CD Civic District, V4 General District, V2 Rural District or V1 Natural District. The Ramona replacement parcel is zoned as M54 Industrial and the Julian replacement parcel is zoned as M52 Industrial.

Table 1 summarizes the various parcels within the main project site and the parcel sizes, as well as the parcels' land use and zoning designations.

Table 1Main Project SiteAPN Numbers, Acreage, Land Use Designations and Zoning

APN Number	Acreage	Ramona Community Plan Area General Plan Land Use Designations (Adopted August 2011)	Ramona Village Form Based Code Zoning Designation (Adopted January 2014)	Current Use
281-182-13	0.97 acre	Public/Semi-Public Lands	CD ¹	Unoccupied/ Vacant (County
760-157-49	2.27 acres	Public/Semi-Public Lands	CD ¹	owned)
281-182-12	1.58 acres	Public-Semi Public Facilities	CD ¹	
281-182-17	2.20 acres	Rural Commercial & Rural Lands	$V4^2$ and $V2^3$	Unoccupied Vacant
281-182-18	5.66 acres	Rural Commercial & Rural Lands	$V4^2$, $V2^3$ and $V1^4$	(Privately Owned)
281-192-03	0.69 acre	Public-Semi Public Facilities	CD ¹	Caltrans Operation Yard
281-191-02	0.69 acre	Public-Semi Public Facilities	CD ¹	

¹ Subject to the Ramona Village District's Public Realm: Civic District Design Standards

² Subject to the Ramona Village District's General District Development Standards

³ Subject to the Ramon Village District's Rural District Development Standards

⁴ Subject to the Ramona Village District's Natural District Development Standards

Table 2 summarizes the two replacement parcels and their sizes as well as the parcel's land use and zoning designations.

Table 2

Replacement Parcels

APN Numbers, Acreage, Land Use Designations and Zoning

APN Number	Acreage	General Plan Land Use Designations	Zoning	Current Use
291-122-18	0.65 acre	Medium Impact Industrial	M52 Industrial	Vacant
281-122-18	0.5 acre	High Impact Industrial	M54 Industrial	Industrial Use (lumber yard)

Vehicular Access to the main project site would be provided by three access points connecting to 13th Street and two access points connecting to 12th Street. Both 12th and 13th Streets are County roads that connect to Main Street.

The project proposes the installation of new utilities to support the proposed project's buildings, and the installation of curbs, gutters and sidewalks along 12th and 13th Streets. All temporary and permanent lighting will be shielded away from preserved native vegetation.

The following project design considerations are also being implemented to minimize environmental impacts:

- All new proposed project buildings will be constructed as "zero net energy" buildings.
- During grading on active grading sites, water will be applied three times daily.
- Unpaved roads will have water applied three times daily
- All vehicles associated with the proposed project shall reduce speeds to 15 mph on unpaved roads
- Exterior coatings shall use architectural coatings with a VOC content of 150 g/l or less and interior coating shall use 100 g/l or less
- In accordance with County of San Diego Planning and Development Services requirements, the project will require the construction contractor to use a minimum of Tier III equipment.

CEQA Guidelines Regarding Recirculation and Substitution of Mitigation Measures in a Proposed IS/MND

Pursuant to CEQA Guidelines, Section 15073.5, the County is required to recirculate a draft IS/MND when the document is substantially revised after public notice of its availability, but prior to its adoption. A substantial revision is identified as follows: (1) a new avoidable significant effect is identified and mitigation measures or project revisions must be added in order to reduce the effect to insignificance or (2) the lead agency determines that the proposed mitigation measures or project revisions will not reduce potential effects to less than significant and new measures or revisions must be required.

The County determined that based on the CEQA Guidelines, Section 15073.5, recirculation of the IS/MND prior to adoption is not required because no substantial revisions were made to the MND. This conclusion is based on the fact that no new, avoidable significant effects have been identified, and no new mitigation measures were added to the Final IS/MND.

RAMONA INTERGENERATIONAL COMMUNITY CAMPUS PROJECT FINAL IS/MND ERRATA

Introduction

The County has prepared this Errata section to clarify information regarding the IS/MND prepared for the proposed Project. This Errata section includes minor edits to the IS/MND and the clarification points herein do not contain significant new information that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the Project or a feasible way to mitigate or avoid such an effect. All of the information elucidated in this Errata section merely illuminates, amplifies, or provides further detail. This information is not "significant" and recirculation of the IS/MND is not required, as defined in the CEQA Guidelines. The County has reviewed the information in this Errata section and has determined that it does not change the findings or the conclusions of the IS/MND and does not constitute "significant new information" pursuant to CEQA. This Errata section merely clarifies data included as part of the IS/MND and does not constitute "substantial revisions" requiring recirculation of the IS/MND as set forth in Section 15073.5 of the CEQA Guidelines. The corrections do not change the environmental analysis in the IS/MND. The clarifications do not demonstrate (1) that a new, avoidable significant effect requiring new mitigation measures will result or (2) that proposed mitigation measures will not reduce all impacts to a less than significant level (14 CCR 15073.5).

In accordance with CEQA Guidelines Section 15121, the IS/MND and technical appendices, together with the Errata section, are intended to serve as documents that will generally inform the decision makers and the public about the environmental effects of the Proposed Project. This Errata section, combined with the Mitigation Monitoring and Reporting Program (MMRP) (which is a separate document) and the Response to Comments, comprises the Final IS/MND.

Errata Items

Table ERR-1 lists errata items identified for the Final MND.

Final IS/MND Errata Items				
MND Location – Section, Page	Revision	Summary		
Section 7 – Description of Project, page 5, first paragraph, second sentence	The project proposes the installation of new utilities to support the proposed project's buildings, and the installation of curbs, gutters and sidewalks along 12 th and 13 th Streets. <u>All</u> temporary and permanent lighting will be shielded away from preserved native vegetation.	IS/MND is revised to clarify that all temporary and permanent lighting will be shielded away from preserved native vegetation.		
Section IV. Biological Resources, page 23, second paragraph, first sentence	Based on a literature search using: 1) the California Department of Fish and Wildlife California Natural Diversity Database, 2) the California Native Plant Society's Online Inventory of Rare and Endangered Vascular Plants, and 3) the San Diego Plant Atlas; a field reconnaissance site visit by Dudek biologists Danielle Mullen, Kathleen Dayton and Marshall Paymard on August 11, 2015; and a Biological Resources Memo dated August 17, 2015 <u>February 3, 2017</u> prepared by Callie Ford, a Dudek staff biologist (attached as Appendix B), the main project site and replacement parcels support a total of six <u>five</u> vegetation communities and/or land cover types as outlined in Table 4, <i>Vegetation Communities</i> and shown on Figures 6 through 8.	The IS/MND is revised to reflect the date of the updated biological resources memorandum attached as Appendix B to the IS/MND and to clarify that there are five vegetation communities and/or land cover types as outlined in Table 4, Vegetation Communities and shown in Figures 6,7, and 8.		
Section IV. Biological Resources, page 24, paragraph 3, first sentence	<u>The Removal of or impacts to jurisdictional wetlands/riparian</u> habitat (southern willow scrub) and non-wetland intermittent stream channel (Santa Maria Creek)and wetlands/riparian habitat (southern willow scrub) adjacent to Santa Maria Creek, including a 200-foot RPO wetland buffer are being avoided (Figure 6); therefore, there are no would cause substantial adverse effects to this resource. Potential indirect impacts from landscaping will be less than significant with implementation of MM-BIO-1. , either directly or through habitat modifications. Mitigation to protect and preserve this area in place is required to avoid direct impacts to the wetland.	IS/MND is revised to clarify the impacts and required mitigation, and avoidance of the RPO wetland and 200' wetland buffer. Figure 6 has also been revised to show this area.		

Table ERR-1

MM-BIO-1 Prior	to grading on the main project site, the	
iurisd	lictional wotlands/riparian habitat and 10-foot	
wide	(287 linear feet) of non-wetland intermittent	
strea	m channel through the creation of an open-	
space	e or conservation easement that contains a	
Contil width	nuous wetland butter of 50 to 200 teet in	
wiuth dovol	lopmont The wetland buffer shall be	
prose	prived through a land conservation easement	
and	shall include the erection of a permanent	
fence	along the edge of the wetland buffer. The	
creat	ion of the buffer shall be in concurrence with	
the	mitigation plan accepted by the Wildlife	
Agen	ncios.	
The west central	portion of the main project site also contains	
a small patch of	willows (0.08 acres) that are the result of run-	
off from the ad	jacent disturbed habitat. This patch is not	
associated with a	a streambed and the surrounding substrate is	
comprised of ripr	rap, therefore it does not meet the standards	
of ACOE/RWQC	B or County jurisdiction wetlands. This is not	
considered to be	e RPO-eligible. However, this patch may be	
	the very small size lack of surrounding	
hydrology and s	surrounding disturbed habitat impacts to this	
0.08-acre area w	ould not be a substantial adverse effect to this	
resource.		
With implement	ation of mitigation measure MM BIO 1 the	
impact would be	less than significant.	
MM-BIO-1 Prior	to grading on the main project site, the	
<u>Loun</u>	<u>Ity shall mitigate impacts to 1.55 acres of</u>	
j unsa wida	(287 linear feet) of non-wetland intermittent	
strea	m channel through the creation of an open-	
<u>50300</u>	e or conservation easement that contains a	
conti	nuous wetland buffer of 50 to 200 feet in	
width	between the wetlands and all proposed	
deve	lopment. The wetland buffer shall be	
prese	erved through a land conservation easement	
and	shall include the erection of a permanent	
fence	e along the edge of the wetland buffer. The	
	mitigation plan accord by the Wildlife	
the line line line line line line line lin	HINGAUOH PIAH ACCEPTED DA THE AAIDUILE	1

	Agenc	cies. All landscaping activities on the project	
	<u>sites v</u>	will incorporate native plants to the extent	
	<u>feasib</u>	le and will avoid _plants listed on California	
	Invasi	ve Plant Council's Invasive Plant Inventory.	
	<u>Additi</u>	onally, temporary and permanent lighting	
	<u>will be</u>	e directed away from the RPO wetland and	
	<u>wetlar</u>	nd buffer areas, shown on Figure 6.	
Section IV.	Non-native gr	assland is considered a sensitive habitat.	The IS/MND is revised
Biological	The main pro	ject site contains 4.12 acres of non-native	to clarify the impacts
Resources,	grassland, of	which approximately <u>3.62.2</u> acres would be	and required
page 25,	preserved ave	oided in the 200-foot <u>RPO</u> wetland buffer	mitigation to non-
paragraph 4,	required in	MM-BIO-1 <u>described above (Figure 6)</u> ,	native grassland. MM-
first sentence	however appr	oximately 0.61.9 acres would be impacted	BIO-2 is revised to
	by the propos	sed project. The Julian replacement parcel	include the
	also includes (0.6 acres of non-native grassland that would	requirement to
	be impacted	by the storage and parking improvements	prepare a
	that are part	of the proposed project (Figure 8). This	management plan as
	represents a s	significant impact; however, this impact will	well as a funding
	be reduced	to below a level of significance with	mechanism. A PAR
	implementatio	on of mitigation measure MM-BIO- <u>1</u> 2, which	may be prepared if the
	requires the p	preservation of off-site non-native grassiand $\Gamma_{\rm s}$	County determines it
	habitat at a 0.3	b: I ratio for the non-native grassiand habitat	necessary.
	Impacted on	The site. Under the County of San Diego	
	Guidelines for	Determining Significance, a mitigation ratio	
	of 0.5:1 may	be used for non-native grassiand loss, so	
	long as the s	site meets the following chieffa: 1) site is	
		Brogram (MSCP) plan: 2) site is located	
	outside of the	Pamona Grasslands Prosonyo Aroa: and 3)	
		Numinal Glassianus Fleselve Alea, and 5)	
	site is not occ	onlacoment parcels most the criteria noted	
		mitigation ratio of 0.5:1 is appropriate	
	Dreservation	of off-site babitat would retain non-native	
	arassland ha	bitat in perpetuity. The 0.61.3 acres of	
	mitigation that	t is proposed would occur at a County-	
	annroved site	With implementation of mitigation measure	
	MM-BIO-2 th	e impact would be less than significant	
	MM-BIO-2:	Impacts to 1.90.6 acres of non-native	
		grassland on the main project site and 0.6	
		acres to be impacted at the Julian	
		replacement parcel to be mitigated at a	
		0.5:1 ratio. Prior to the issuance of any	
		grading or improvement plans, 0.61.3	
		acres of non-native grassland shall be	
		purchased on a County-approved	

	mitigation bank.The County-approved mitigation bank shall contain non-native grassland or provide opportunities to restore disturbed areas to grassland habitat.The proposed project would also grade and construct on 2.65 acres of developed habitat and 9.08.8 acres of disturbed habitat (Figures 6 through 8). These are not considered to be sensitive habitats and do not require mitigation.	
Section IV. Biological Resources, page 26, paragraph 4, first sentence	San Diego GumplantSpecial-Status Plants A population of approximately 100 individual San Diego gumplant (Grindellia hallii) was found on the Julian replacement parcel_during rare plant surveys in 2015. San Diego gumplant is a County of San Diego List A plant and has a California Native Plant Survey rare plant rank of 1B.2, meaning that it is rare, threatened or endangered in California or elsewhere. Additional rare plants have potential to occur based on the location, elevation range, and vegetation communities. The following rare plants have potential to occur on site and may not have been detectable during the August 2015 survey due to their bloom periods: San Diego thorn-mint (Acanthomintha ilicifolia, FT/CE/1B.1/List A) San Diego goldenstar (Bloomeria clevelandii, None/None/1B.1/List A) Thread-leaved brodiaea (Brodiaea filifolia, FT/CE/1B.1/List A) Orcutt's brodiaea (Brodiaea orcuttii, None/None/1B.2/List B) Dunn's mariposa lily (Calochortus dunnii, None/CR/1B.2/List A) Iong-spined spineflower (Chorizanthe polygonoides var. longispina, None/None/1B.2/List A) San Miguel savory (Clinopodium chandleri, None/None/1B.2/List A) San Miguel savory (Convolvulus simulans, None/None/4.2/List D) western dichondra (Dichondra occidentalis, None/None/4.2/List D) 	MM-BIO-3 is revised to include the requirement to prepare a management plan as well as a funding mechanism. A PAR may be prepared if the County determines it necessary.

 variegated dudleya (Dudleya variegata, 	
None/None/1B.2/List A)	
var. parishii, FE/CE/1B.1/List A)	
Palmer's grapplinghook (Harpagonella palmeri,	
None/None/4.2/List D)	
• vernal barley (Hordeum intercedens,	
None/None/3.2/LIST C) Cander's pitcher sage (Lepechinia ganderi	
None/None/1B 3/List A)	
 small-flowered microseris (Microseris douglasii 	
ssp. platycarpha, None/None/4.2/List D)	
 little mousetail (Myosurus minimus ssp. apus, 	
None/None/3.1/List C)	
 Californicum None/None/4 2/List D) 	
 golden-raved pentachaeta (Pentachaeta aurea) 	
ssp. aurea, None/None/4.2/List D)	
 Moreno currant (Ribes canthariforme, 	
None/None/1B.3/List A)	
Development of the Julian replacement parcel would result in	
impacts to the San Diego gumplants. Under the County of	
San Diego Guidelines for determining significance, a	
mitigation ratio of 3:1 may be used for loss of the San Diego	
in Preservation of these plants would be retained in	
perpetuity. The preservation of 300 plants as mitigation	
would occur at a County approved site. Mitigation options can	
include translocation of the Julian replacement parcel	
population. Additionally, the rare plants listed above could	
surveys Impacts to the San Diego gumplant as well as	
potentially occurring rare plants would be a potentially	
significant adverse effect. With implementation of Mitigation	
Measure MM-BIO-3, the impact would be less than	
significant.	
MM-BIO-3 Impacts to 100 individual San Diego gumplants to	
be mitigated at a 3:1 ratio. Prior to the issuance of	
any grading or improvement plans on the Julian	
replacement parcel, 300 San Diego gumplants	
on a County-approved mitigation bank as	
described in BIO-1. The Applicant shall develop a	
rare plant relocation management plan for the	

	County-approved mitigation sitebank (described in	
	BIO-1) (prepared by a biologist with at least 5 years	
	of experience in rare plant relocation), with plant	
	specimens grown on site or from local seed or	
	cutting sources. The County-approved mitigation	
	bank shall include the appropriate habitat, soils,	
	and located in areas known to support San Diego	
	gumplant. Prior to construction, rare plant surveys	
	for the 11 County List A plants and the 1 County	
	List B plant species that have potential to occur on	
	site, will be conducted to determine	
	presence/absence. If these species are found, they	
	will be addressed in the rare plant management	
	plan. The individuals shall be planted within the	
	open space to secure a 2:1 or 3:1 mitigation ratio	
	for any County List A species, and a 1:1 mitigation	
	ratio for County list B species identified. The rare	
	plant relocation plan shall require the Applicant to	
	submit a revegetation plan, including annual	
	monitoring reports for at least 5 years after the	
	replanting to demonstrate that the plants have	
	been successfully established at the required	
	mitigation ratio.	
Section IV.	Less Than Significant Impact With Mitigation	The IS/MND is revised
Biological	Incorporated: As discussed above in Question a, the	to clarify the impacts
Resources,	literature search, reconnaissance site visit and biological	and required
page 32,	memo dated August 17, 2015 February 3, 2017, determined	mitigation, and
paragraph 2,	that the main project site and replacement parcels support a	avoidance of the RPO
first sentence	variety of sensitive vegetation communities and land cover	wetland and 200
	types, including 1.65 acres of jurisdictional wetlands/riparian	wetland buffer. Figure
	habitat. With <u>avoidance of these jurisdictional</u>	6 has also been
	wetlands/riparian habitat, the incorporation of MM-BIO-1,	revised to show this
	potential impacts to these natural communities would be	area. MM-BIO-4 has
	mitigated to below a level of significance there are no	been revised to
	significant adverse effects. In addition, the wetland buffer	include more details
	ensures that all development is set back 200 feet to protect the	on avoiding impacts to
	riparian habitat and incorporation of this avoidance area and	nesting birds and to
	BIO-1 ensures there are no trom potential indirect impacts,	include
	including noise, light, human encroachment and invasive	fencing/flagging, as
	species.	well as a biological
		monitor.
	I ne main project site contains trees, which can provide nesting	
	nabitat for birds that are protected under the Migratory Bird	
	I reaty Act. Breeding birds can be significantly affected by	

short-term construction-related noise, which can result in the disruption of foraging, nesting, and reproductive activities. If breeding birds are in areas adjacent to the proposed project site during construction activities, their reproductive activities could be adversely impacted by construction-related noise. Therefore, indirect impacts to nesting birds due to construction-related noise may occur as a result of the proposed project. This potential indirect impact to breeding birds is considered significant and mitigation (MM-BIO-4) would be required.	
MM-BIO-4 If project-related work is to occur during the avian breeding season (15 February – 31 August), then pre-construction protocol level surveys for migratory birds shall be performed to determine the status of breeding birds on-site and within 500-feet of the site. If nesting migratory birds are detected on-site or within 500-feet of the site, a 300-foot buffer (500 feet for raptors) shall be established between the nesting bird and the construction activities. Clearing and construction within 300 feet of the nest (500 feet for raptors) shall be postponed or halted, at the discretion of the biologist, until the nest is vacated and juveniles have fledged, as determined by the biologist, and there is no evidence of a second attempt at nesting. Limits of construction to avoid an active nest shall be established in the field with flagging, fencing, or other appropriate barriers, and construction personnel shall be instructed on the sensitivity of nest areas. A biological monitor shall serve as construction activities will occur near active nest areas to ensure that no inadvertent impacts to these nests occur. Once the nesting birds have fledged, construction activities may resume within the previous buffer area.	
Started on construction equipment or panels or supporting structures. Once the nesting birds have fledged, construction activities may resume within the previous buffer area.	

	Incorporation of MM-BIO-4 <u>3</u> will bring this potential impact to below a level of significance.	
Section IV. Biological Resources, page 33, paragraph 8, first sentence	This Removal of or impacts to jurisdictional wetlands/riparian habitat (southern willow scrub) and non-wetland intermittent stream channel (Santa Maria Creek) would cause substantial adverse effects, either directly or through habitat modifications will not be impacted. However, with the implementation of MM-BIO-1 , all impacts will be avoided because federally protected wetlands have been placed in a biological conservation easement with the 200-foot wetland buffer and no significant impacts will occur to federally protected wetlands on the main project site.	The IS/MND is revised to clarify the impacts and required mitigation, and avoidance of the RPO wetland buffer. Figure 6 has been revised to show this area.
Section IV. Biological Resources, page 34, paragraph 6, first sentence	Less than Significant Impact with Mitigation Incorporated: An analysis of the County's Geographic Information System (GIS) records, the County's Comprehensive Matrix of Sensitive Species, a site visit by Dudek biologists Danielle Mullen, Kathleen Dayton and Marshall Paymard on August 11, 2015, and a Biological Resources Report dated August 17, 2015 <u>February 3, 2017</u> prepared by Callie Ford, Dudek staff biologist, determined that there is no evidence on the main project site or replacement parcels that demonstrates they are an established native resident or migratory wildlife corridor. Therefore, the project's impacts to the movement of any native resident or wildlife species are less than significant. However, MM-BIO-4, above, will further ensure migratory birds nesting on the site will be protected, so that project construction does not disrupt avian breeding or impede the use of avian nursery sites.	The IS/MND is revised to show the updated date of the biological resources memorandum attached as Appendix B of the IS/MND
Section VIII Hazards and Hazardous Materials, Page 52, paragraph 4	MM-HAZ-1 The <u>Countyfuture site occupants</u> shall not commence grading the main project site until the vapor survey for the Ramona Texaco at 1210 Main Street is completed, and a determination is made as to the risk to worker's health and safety. Once the health risk assessment is complete, the <u>Countyfuture site occupants</u> shall follow the recommendations outline in the DEH letter dated March 13, 2005, which include: 1) remove the sea cargo container on APN 281-191-03 and 2) upon redevelopment, enter the Voluntary Assistance	MM-HAZ-1 is revised to state "future site occupants" will comply with the MM-HAZ-1

	Program for oversight of management of petroleum-impacted soil.	
Page 105	Figure 6: Conceptual Site Plan is replaced by Figure 6: Main Project Site Biological Resources with Impact Limits.	Figure 6 of the IS/MND was changed to show the biological resources and proposed impacts on the main project site. The IS/MND is also revised to clarify the impacts and required mitigation, and avoidance of the RPO wetland and 200' wetland buffer.
Page 107	Figure 7: Ramona Replacement Project Site Biological Resources with Impact Limits	Figure 7 was added to the IS/MND to show the biological resources and the proposed impacts on the Ramona Replacement Project Site.
Page 108	Figure 8: Julian Replacement Project Site Biological Resources with Impact Limits	Figure 8 was added to the IS/MND to show the biological resources and the proposed impacts on the Julian Replacement Project Site.
Appendix B – Ramona Intergeneration Community Campus Biological Memorandum, Page 1, paragraph 1	To:Marc Cass, County of San DiegoFrom:Callie Ford, DudekSubject:Ramona Intergenerational Community Campus Project (RICC)Date:December 16, 2016 February 3, 2017cc:Carey Fernandes, DudekAttachment(s):Figures 1-3, Attachment A	The date of the biological resources memorandum was updated to reflect February 3, 2017.
Appendix B – Ramona Intergeneration Community Campus Biological	A total of sixfive vegetation communities and/or land cover types were mapped within the proposed RICC project site and associated parcels (Figures 1 through 3). Descriptions of each vegetation community are provided following Table 1. Holland	The biological resources memorandum is revised to clarify that there are five vegetation

Memorandum, Page 4, paragraph 6	(1986) and Oberbauer et al. (2008) were used to describe vegetation communities on site.	communities and/or land cover types as outlined in Table 1, Vegetation Communities and shown in Figures 1, 2, and 3.
Appendix B – Ramona Intergeneration Community Campus Biological Memorandum, Attachment A	 Figures have been revised to include: Figure 1: Main Project Site Biological Resources with Impact Limits. Figure 2: Ramona Replacement Project Site Biological Resources with Impact Limits Figure 3: Julian Replacement Project Site Biological Resources with Impact Limits 	Figures 1 through 3 in the biological resources memorandum (Appendix B to the MND) show the vegetation communities, jurisdictional resources, and rare plants mapped on site.

RESPONSES TO COMMENTS ON THE DRAFT IS/MND

In accordance with CEQA Guidelines Section 15073, the IS/MND was circulated for a 30-day public review comment period. The comment period began December 2, 2016, and ended January 2, 2017. Following the public and agency comment period for the MND, this document was prepared with the responses to the comments raised in relation to the circulated IS/MND. According to CEQA, the lead agency shall evaluate comments on environmental issues received from persons who have reviewed the draft and shall provide a written response. The County has prepared responses to all environmental impact areas. A total of 3 comment letters were received by the County. The responses to the comments received are provided in this section. The numbered responses to each of the comments made are cross referenced to the comment letters, copies of which are provided in Appendix A. Comments that do not state a concern or question regarding the adequacy of the Draft IS/MND are not required to have a response pursuant to CEQA.

Responses to Comment Letter 1

U.S. Fish and Wildlife Service and the California Department of Fish and Wildlife

January 13, 2017

1-1 The comment states that the biological resources are not clearly identified, the extent of the project impacts are unclear, and the mitigation measures lack specificity to fully avoid and minimize project-related impacts.

Figures 1 through 3 in the biological resources memorandum (Appendix B to the MND) show the vegetation communities, jurisdictional resources, and rare plants mapped on site. The Final MND is revised to include Figures 6 through 8 which show the biological resources and proposed impacts.

1-2 The comment notes that the MND states there are six vegetation communities, but the biological resources memorandum only lists five.

The biological resources memorandum, pg. 4, and Final MND, pg. 23, have been revised to state the following: "a total of five-six vegetation communities and/or land cover types".

- **1-3** The comment recommends protocol rare plant surveys during the sprint (March-May) to more accurately determine the presences of rare plants. Rare plant surveys and a rare plant protection plan are required as part of mitigation measure BIO-3.
- **1-4** The comment states that the MND is unclear on the project impacts and the softball field and trails shown within a portion of the 200' conservation easement buffer described in BIO-1 are not compatible uses for open space, and need to quantified and mitigated.

The MND is revised to clarify the impacts and required mitigation, and avoidance of the RPO wetland and 200' wetland buffer. Figure 6 has been revised to show this area.

1-5 The comment states that the MND shows non-native grassland impacted by the softball field and trails that are not quantified. The commenter recommends mitigating all impacts to NNG at a 1:1 mitigation ratio due the importance of grassland supporting burrowing owl, golden eagle, and other raptors through purchasing off-site credits rather than conserving fragmented portions.

The MND is revised to clarify the impacts and required mitigation. Additionally, the NNG located within the open space easement within the RPO buffer and adjacent to the riparian

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area is not considered fragmented and contributes to the quality of the habitat by providing additional foraging opportunities for riparian species as well as offering a buffer between the development and the riparian vegetation.

The site visits did not find any evidence of burrowing owl use and the closest CNDDB record for burrowing owl is 2.3 miles west of the site. Additionally, the sites are likely too urban to be used by raptors, including golden eagle. Therefore, the County disagrees that the NNG meets the definition of a Sensitive Habitat Lands under the RPO and requires more than the 0.5:1 mitigation ratio.

1-6 The comment states that the MND does not show the location of the San Diego gumplant that would be impacted.

The MND is revised to clarify the impacts and required mitigation. Figure 8 has been added which shows the location of the San Diego gumplant.

1-7 The comment states that mitigation measures BIO-1, BIO-2 and BIO-3 should include the preparation of a management and monitoring plan (MMP), and describe the funding commitment for the on-site and/or off-site conservation easements. The MMP should include a PAR.

BIO-2 and BIO-3 were revised to include the requirement to prepare a management plan as well as a funding mechanism. The County will prepare the management plan and identify the funding mechanism. A PAR may be prepared if the County determines it necessary.

1-8 The comment recommends that vegetation clearing, grading, and construction activities occur outside of the avian breeding season. BIO-4 should include more contingencies for the project activities and how they will avoid impacts to nesting birds.

BIO-4 has been revised to include more details on avoiding impacts to nesting birds.

1-9 The comment recommends the buffer for an active nest be increased to 500 feet for raptor species.

BIO-4 has been revised to include more details on avoiding impacts to nesting birds.

1-10 The comment recommends that fencing or flagging shall be installed to delineate the limits of construction to protect avoided biological resources. The comment recommends requirements for biological monitoring.

BIO-4 has been revised to include fencing/flagging, as well as a biological monitor.



1-11 The comment recommends shielding temporary or permanent lighting away from preserved native vegetation.

BIO-1 has been revised to include requirements to shield light away from the avoided habitat areas.

1-12 The comment recommends using native plants in all project landscaping and avoid plants listed on the California Invasive Plant Council's Invasive Plant Inventory.

BIO-1 has been revised to include requirements for native plantings and avoidance of plants on Cal-IPC's Invasive Plant Inventory.

1-13 The comment states that the Wildlife Agencies typically accept the results of the fairy shrimp surveys up to 1 year. The Wildlife Agencies recommend future surveys be conducted and to contact the FWS office to ensure compliance with the Endangered Species Act.

Comment noted. Protocol-level vernal pool branchiopod surveys were completed for this project. The last wet season survey was completed in May 2016 and the dry season was completed in June 2016. The FWS guidelines (USFWS 2015) do not specify a term for which the surveys are valid, and given that the surveys have been completed less than one year ago, they are still considered valid. If a reasonably long delay occurs between the surveys and project construction, it is understood that the County may be required to conduct additional surveys.

1-14 The commenter states that vernal pool plant species may be present on site and recommends spring surveys when those species would be detectable. If vernal pools with vernal pool plants are found, impacts to those should be mitigated at a minimum of 3:1 mitigation ratio.

Rare plant surveys are required under mitigation measure BIO-3. However, as stated in the vernal pool report and the comment, the habitat for vernal pool branchiopods were primarily road-ruts on disturbed areas showing signs of fill and void of vegetation. Therefore, it is unlikely these features support vernal pool plants.

Responses to Comment Letter 2

Department of Toxic Substances Control

January 13, 2017

2-1. This comment states that the MND should identify and determine whether current or historic uses at the project site may have resulted in any release of hazardous wastes/substances. A Phase I Environmental Site Assessment may be appropriate to identify any recognized environmental conditions.

Appendix E of the November 3, 2016 MND included a Hazards Assessment for the Ramona Intergenerational Community Campus Project (Dudek 2015). The Hazards Assessment included a review and summary of the following data:

- (1) Regulatory agency records for sites within the ASTM 1527-13 specified search radius (provided by Environmental Data Resources (EDR) in August 2015),
- (2) Historical aerial photographs,
- (3) Records on or near the project site listed in GeoTracker and EnviroStor (online databases maintained by the State Water Resources Control Board and Department of Toxic Substance Control, respectively), and
- (4) Previous hazard studies prepared for developments near the project site.

The Hazards Assessment identified current and historic uses on and around the Main Project Site and replacement parcels, and reviewed the available environmental data. The Hazards Assessment findings and are presented below:

- Parcel APN 281-191-02 of the Main Project Site is the Ramona Maintenance Station owned by Caltrans. This parcel is located at the southeastern portion of the Main Project Site. It is listed in the HIST CORTESE, LUST, SWEEPS UST, San Diego Co. HMMD, and San Diego Co. SAM databases. Upon removal of two USTs in July 1986, residual petroleum hydrocarbons were observed in the excavation pit. Remediation activities were conducted at the site between 1990 and 2005. A 2004 health risk evaluation concluded the residual contamination represented less than a one in one million cancer risk for residential use at the site. In 2005, maximum benzene and toluene detections in groundwater were reported as 6.8 micrograms per liter (µg/L) and 11 µg/L, respectively. In April 2006, the case was closed by the San Diego County Local Oversight Program (LOP).
- The other APNs located within the Main Project Site were not listed in the regulatory databases searched for the EDR report
- The Ramona Texaco at 1210 Main Street is located adjacent to the Main Project Site, to the south. A release of gasoline to soil was reported at the Ramona Texaco in October



1998. This site is currently undergoing active remediation; groundwater sampling occurs on a semi-annual basis. According to the May 2015 groundwater concentration maps, benzene and methyl tert-butyl ether (MTBE) plumes extend onto the Main Project Site. In wells nearest the Main Project Site, benzene concentrations in groundwater ranged from 130 μ g/L to 4,400 μ g/L, greater than the EPA Maximum Contaminant Level (MCL) of 5 μ g/L established for drinking water. In a letter dated July 8, 2015, the Department of Environmental Health (DEH) approved a workplan for a soil vapor survey and stated that the Ramona Texaco should complete a health risk assessment to evaluate potential impacts to any proposed buildings constructed on the Caltrans site (which is part of the Main Project Site).

- A total of 36 additional sites, within the ASTM-specified search distances of the Main Project Site, were listed in regulatory agency databases. The available information did not indicate that the Main Project Site has been impacted by contamination from these nearby sites.
- Based on the review of aerial photographs, the central portion of the Main Project Site may have been used for agriculture from at least 1939 to 1979. Thus there is a potential for residual pesticides to be present in shallow soils associated with former agricultural uses in this area.

2-2. This comment states that if there are any recognized environmental conditions in the project area, then proper investigation, sampling and remedial actions overseen by the appropriate regulatory agencies should be conducted prior to the new development or any construction.

As the Hazards Assessment did not include a site inspection or environmental lien search, it does not meet the standard of a Phase I Environmental Site Assessment, and as such the findings were not discussed in terms of recognized environmental conditions (REC). However, as discussed above in the response to Question 1, there are potential impacts to the Main Project Site that would constitute RECs. Accordingly, the following recommendations were outlined in the IS/MND and Hazards Assessment (Dudek 2015):

- Development of the Main Project Site should not begin until the proposed soil vapor survey for the Ramona Texaco site is completed and results are evaluated for potential risk to construction workers and future site occupants. If the survey results indicate a vapor intrusion risk, appropriate mitigation measures should be implemented (see MM-HAZ-1 in the MND).
- Due to the historical agricultural activities on the central portion of the Main Project Site, soils may contain chlorinated and/or arsenical pesticides. Thus, soil sampling may

be necessary before excavation or construction activities in order to assess potential human health and environmental risk (see MM-HAZ-6 in the MND).

- In a letter dated March 13, 2005, San Diego DEH outlined recommendations for APN 281-191-03 (Ramona Maintenance Station on parcel owned by Caltrans) which should be completed prior to site development. The County will follow through with the DEH-recommended tasks, including:
 - Remove the sea cargo container on the property, and
 - Upon redevelopment, enter the Voluntary Assistance Program for oversight of management of petroleum-impacted soil (see MM-HAZ-1 in the MND).
- A variety of hazardous substances and wastes could be stored, used, and generated on • the project site during construction of the RICC Project. These would include fuels for machinery and vehicles, new and used motor oils, cleaning solvents, paints, and storage containers and applicators containing such materials. Hazardous materials should 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. Accident prevention and containment would be the responsibility of the construction contractors. The developer would monitor all contractors for compliance with applicable regulations, including regulations regarding hazardous materials and hazardous wastes (including disposal). All construction waste, including 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. Adherence to the construction specifications and applicable regulations regarding hazardous materials and hazardous waste, including disposal, would ensure that construction of the proposed project would not create a significant hazard to the public or environment (see MM-HAZ-2 and MM-HAZ-3 in the MND).
- A Site Mitigation Plan (SMP) should be developed and followed during all development activities. The SMP should include strategies for identification and management of contaminated soil, and should outline mitigation measures should these development activities result in an accidental release of contaminants. The SMP should include a hazardous substance management, handling, storage, disposal, and emergency response plan. Hazardous materials spill kits should be maintained on-site for small spills. Copies of the SMP should be maintained on site during demolition, excavation, and construction of the proposed project. All workers on the project site should be familiar with these documents (see MM-HAZ-4 in the MND).
- A project-specific Health and Safety Plan (HASP) should be developed and followed during all construction-related activities. Copies of the HASP should be maintained on site during demolition, excavation, and construction of the proposed project. All workers on the project site should be familiar with these documents (see MM-HAZ-5 in the MND).

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2-3. This comment states if the project plans include discharging wastewater to a storm drain, you may be required to obtain an NPDES permit from the overseeing Regional Water Quality Control Board (RWQCB).

The developer will be ultimately responsible for obtaining the appropriate permits for construction and operation of the new facilities. Typically, contractors and consultants will assist with recognizing and applying for the appropriate permits. The developer and contractors will maintain transparency and keep an open line of communication with the RWQCB during planning, development, and operation of the facilities. See Section IX. Hydrology and Water Quality in the MND for a discussion of the NPDES requirement and recommended best management practices for stormwater management.

2-4. This comment quotes the MND as stating, "The County shall not commence grading the main project site until the vapor survey for the Ramona Texaco at 1210 Main Street is completed, and a determination is made as to the risk to worker's health and safety." As far as the project site is proposed for the development of residential purposes or sensitive uses (e.g., 12,500 square-foot senior facility; 5,000 square-foot adult day care center; 14,000 square-foot community gymnasium and teen cafe; and 20,000 square-foot childcare center), evaluation of potential vapor intrusion risk for sensitive uses in the future is necessary rather than just workers' health and safety. The proposed occupants would be senior citizens, teens and children. Adequate mitigation measures or cleanup to unrestricted use should be obtained prior to the development of the site.

The County agrees with this comment. Development of the Main Project Site should not begin until the proposed soil vapor survey for the Ramona Texaco site is completed and results are evaluated for potential risk to construction workers and future site occupants. If the survey results indicate a vapor intrusion risk, appropriate mitigation measures should be implemented. MM-HAZ-1 will be revised to include "future site occupants."

2-5. This comment states the MND describes the Main Project Site as: "The southeastern portion of the main project site includes two 0.69-acre parcels currently owned by Caltrans (APN #281-191-03 and APN #281-191-02). These parcels were formerly operated as a Caltrans vehicle service and maintenance yard and currently contain a former sea cargo container and no other structures." The historical use of this area includes vehicle service and maintenance which are recognized environmental conditions. Proper evaluation, investigation and mitigation measures, if necessary, should be implemented.

Parcel APN 281-191-02 of the Main Project Site has been assessed, remediated, and reevaluated for human health risk for residential use; it received case closure in 2006. In the context of a Phase I ESA, the status of the parcel would be considered a historical REC, but not a current REC; therefore no additional evaluation or investigation is warranted. However, the IS/MND did recommended preparation of a Site Mitigation Plan (MM-HAZ-

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4) which would outline procedures for identification and management of impacted soil should it be discovered during construction.

With regard to APN 281-191-03, as noted in the response to Question 2 above, the County will follow through with the DEH-recommended tasks, including:

- Remove the sea cargo container, and
- Upon redevelopment, enter the Voluntary Assistance Program for oversight of management of petroleum-impacted soil (see MM-HAZ-1 in the MND).

It is anticipated that entrance into the Voluntary Assistance Program for oversight and management of petroleum-impacted soil will require investigation, evaluation, and potential mitigation.

2-6. This comment states that the Main Project Site is furthered describes in the MND as, "The rest of the main project site includes five vacant parcels that are located to the north of the Caltrans parcels and the Ramona Public Library." Historical use of these vacant parcels should be evaluated. If there is any potential presence of hazardous constituents, further evaluation, investigation and mitigation, if necessary, should be implemented.

Historical use of these vacant parcels was evaluated as discussed in the response to Questions 1, above, and as detailed in the Hazards Assessment (Dudek 2015). Given the historical agricultural activities on the central portion of the Main Project Site, soils may contain chlorinated and/or arsenical pesticides. Thus, soil sampling may be necessary before excavation or construction activities in order to assess potential human health and environmental risk (MM-HAZ-6 in the MND).

2-7. This comment states the First Replacement Parcel is defined in the MND as, "The first replacement parcel is a 0.5-acre parcel that is located approximately 900 feet north of the main project site in the community of Ramona (APN #281-122-18) (Figure 4, Ramona Replacement Parcel). This parcel currently contains a lumber operation." Lumbar . . . cinders." Wood preservatives contain volatile organic compounds (VOCs) and other hazardous constituents. This area should be investigated and remediated, if necessary.

As noted in the IS/MND, the first replacement parcel (in Ramona) contains a lumber operation. Based on a review of current aerial photographs, the wood trusses used to support roofs typical of residential or small commercial buildings are assembled and stored on the site. There is no indication of wood treating activities occurring on this parcel, therefore no reason to suspect wood preservation chemicals would be present in soil or groundwater.

The cinders statement was as follows: "This parcel [APN 291-122-18] is currently vacant and will be improved for Caltrans staging and storage purposes including the construction of a 1,600 square foot storage barn for dry sand and cinders." Therefore, cinders refers to

a planned future use by the new owner of the replacement parcel. Once this storage barn is operational, Caltrans will be responsible for ensuring that the cinders are managed in a way that they do not pose an unacceptable risk to human health or the environment.

2-8. This comment quotes the IS/MND as stating, "The second replacement parcel is a 0.65-acre parcel that is located approximately 12 miles east of the main project site in the unincorporated community of Julian (APN #291-122-18) (Figure 5, Julian Replacement Parcel). This parcel is currently vacant ... cinders." Historical uses of this vacant parcel should be evaluated, and if any recognized environmental conditions exist in the project area, then proper investigation, sampling and remedial actions overseen by the appropriate regulatory agencies should be conducted prior to the new development.

Historical uses of this parcel were evaluated during the Hazards Assessment as described in response to Question 1, above. This parcel has been vacant since at least 1994. There were no records related to this parcel in the regulatory databases searched or at the County Department of Health. Adjacent sites were also evaluated for their potential to impact this parcel. No impacts were identified for this parcel; therefore, no additional investigation is recommended.

The reference to "cinders" in the MND was as follows: "This parcel is currently vacant and will be improved for Caltrans staging and storage purposes including the construction of a 1,600 square foot storage barn for dry sand and cinders." Therefore, cinders refers to a planned future use for the replacement parcel. Once this storage barn is operational, Caltrans will be responsible for ensuring that the cinders are managed in a way that they do not pose an unacceptable risk to human health or the environment.

2-9. This comment states if during construction/demolition of the project, soil and/or groundwater contamination is suspected, construction/demolition in the area should cease and appropriate health and safety procedures should be implemented. If it is determined that contaminated soil and/or groundwater exist, the MND should identify how any required investigation and/or remediation will be conducted, and the appropriate government agency to provide regulatory oversight.

The following recommendations were made in the MND and Hazards Assessment (Dudek 2015):

• A Site Mitigation Plan (SMP) should be developed and followed during all development activities. The SMP should include strategies for identification and management of contaminated soil, and should outline mitigation measures should these development activities result in an accidental release of contaminants. The SMP should include a hazardous substance management, handling, storage, disposal, and emergency response plan. Hazardous materials spill kits should be maintained on-site for small spills. Copies of the SMP should be maintained on site during demolition, excavation, and construction of the proposed project. All workers on the project site should be familiar with these documents.

• A project-specific Health and Safety Plan (HASP) should be developed and followed during all construction-related activities. Copies of the HASP should be maintained on site during demolition, excavation, and construction of the proposed project. All workers on the project site should be familiar with these documents.

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Responses to Comment Letter 3

Department of Transportation

January 4, 2017

3-1. This comment states that the existing curb ramps located at 12th and 13th Street must be upgraded to the current American with Disabilities Act (ADA) standards. A Construction detail sheet will be needed to show elevations and slopes of the proposed ADA curb ramp to show that it meets Caltrans DIB-82-04 guidelines. Please refer to 2015 Standard Plan A88A to A88B. No pedestrians will be allowed to cross SR-67 (Main Street) fronting the proposed Project.

Comment noted. Curb ramps at 12th and 13th street will be upgraded to current ADA standards that will meet Caltrans DIB 82-04 Guidelines.

3-2 This comment states that work performed within Caltrans right-of-way to complete ADA improvements will require discretionary review and approval by Caltrans. An Encroachment permit will be required for any work within the Caltrans right-of-way prior to construction.

Comment noted. An encroachment permit will be applied for through Caltrans for all work that would occur with the right-of-way.

3-3 This comment asks for clarification of Mitigation Measures for cumulative impacts stating "payment of the required Traffic Impact Fee (TIF) would mitigate the Project's cumulative impact to below a level of significance."

A Traffic Impact Fee is designed to mitigate cumulative impacts (i.e. past project, current project, and reasonably foreseeable future projects) by requiring a monetary payment that is generally proportional to the traffic expected to be generated by the project. The fees would be used for improvements to the circulation system in the area."

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APPENDIX A - COMMENT LETTERS

Comment Letter #1



U.S. Fish and Wildlife Service Carlsbad Fish and Wildlife Office 2177 Salk Avenue, Suite 250 Carlsbad, California 92008 760-431-9440 FAX 760-431-9624



California Department of Fish and Wildlife South Coast Region 3883 Ruffin Road San Diego, California 92123 858-467-4201 FAX 858-467-4299

In Reply Refer To: FWS/CDFW-SDG-17B0047-17CPA0035

> January 13, 2017 Sent by Email

Mr. Marc Cass Project Manager-Entitlements County of San Diego Department of General Services 5560 Overland Avenue, Suite 410 San Diego, California 92123

Subject: Draft Mitigated Negative Declaration for the Ramona Intergenerational Community Campus Project, San Diego County, California (SCH# 2016121008)

Dear Mr. Cass:

The U.S. Fish and Wildlife Service (Service) and the California Department of Fish and Wildlife (Department), hereafter collectively referred to as the Wildlife Agencies, have reviewed the abovereferenced draft Mitigated Negative Declaration (MND) dated November 3, 2016. We requested, and were granted an extension until January 16, 2017, to submit our comments. The Wildlife Agencies have identified potential effects of the proposed project on wildlife and sensitive habitats. Our comments and recommendations are based on the information provided in the draft MND, our knowledge of sensitive and declining vegetation communities in San Diego County, and our participation in regional conservation planning efforts.

The primary concern and mandate of the Service is the protection of fish and wildlife resources and their habitats. The Service has the legal responsibility for the welfare of migratory birds, anadromous fish, and threatened and endangered animals and plants occurring in the United States. The Service also is responsible for administering the Federal Endangered Species Act of 1973 (Act), as amended (16 U.S.C. 1531 *et seq.*), including habitat conservation plans (HCP) developed under section 10 of the Act. The Department is a Trustee Agency and a Responsible Agency pursuant to the California Environmental Quality Act (CEQA; §§15386 and 15381, respectively) and is responsible for ensuring appropriate conservation of the State's biological resources, including rare, threatened, and endangered plant and animal species pursuant to the California Endangered Species Act (CESA; Fish and Game Code §2050 *et seq.*) and other sections of the Fish and Game Code. The Department also administers the Natural Community Conservation Planning (NCCP) program (Fish and Game Code 2800, *et seq.*).

The proposed project contains two components: the exchange of two 0.69-acre parcels for one 0.5-acre and one 0.65-acre parcel between Caltrans and the County of San Diego; and the development of the Ramona Intergeneration Community Campus (RICC). The proposed RICC is located in central San Diego County within the downtown area of the unincorporated community of Ramona, California. The two 0.69-acre parcels that the County of San Diego would acquire from Caltrans would be developed as part of the RICC project footprint. In return, Caltrans would receive a 0.5-acre

replacement parcel that is currently developed and located approximately 900 feet north of the proposed RICC. The other 0.65-acre replacement parcel that Caltrans would receive currently supports non-native grassland and approximately 100 San Diego gumplant (*Grindelia hirsutula* var. *hallii*; SD gumplant) individuals. This parcel is located approximately 12 miles east of the RICC site in the unincorporated community of Julian. Both of the replacement parcels will serve as staging areas and for storage of Caltrans equipment.

The RICC site is approximately 14 acres in size – including two privately owned parcels on the northern end of the site that the County is proposing to acquire in addition to the Caltrans parcels. The entirety of the proposed project site is bounded by the Santa Maria Creek to the north and is otherwise bounded by development including the Ramona Branch Library. The site currently supports southern willow scrub and non-native grassland/non-native grass broad-leafed dominated (NNG) habitats as well as disturbed and developed areas. In addition, 11 ephemerally ponded features that could potentially support federally listed branchiopod species were identified. The proposed RICC includes the construction of numerous facilities including a senior facility, adult day care center, a community gymnasium, a teen café, a childcare center, a family resource center, and a community support center. It will also include the development of approximately 230 parking spaces, various infrastructure improvements, and a recreation area.

The RICC project site and Caltrans replacement parcel located in Ramona are outside of the identified Pre-approved Mitigation Areas (PAMA) in the draft Multiple Species Conservation Program North County Plan (NCMSCP). The other Caltrans replacement parcel in Julian is outside of the Focused Conservation Areas in the draft Multiple Species Conservation Program East County Plan (ECMSCP).

Our general concerns with the draft MND are that the biological resources on the project site are not clearly identified, the extent of project impacts are unclear, and the mitigation measures lack specificity and are thus inadequate in fully avoiding, minimizing, and sufficiently mitigating project-related impacts. The Wildlife Agencies offer the following specific comments and recommendations to assist the County in avoiding, minimizing, and adequately mitigating project-related impacts to biological resources:

- 1. The draft MND states that the RICC site and two replacement parcels support a total of six vegetation communities and/or land cover types as outlined in Table 4. However, Table 4 and the subsequent text in the memorandum by DUDEK regarding biological resources dated August 17, 2015 (Appendix B of the draft MND); only list five vegetation communities/land cover types. The final MND should clarify the number of vegetation communities/land cover types on the RICC site and the two replacement parcels.
- 2. The draft MND states that a rare plant survey was performed in August 2015 and Appendix B indicates that a subsequent rare plant survey was planned during the spring (March-May) in 2016 in order to better accurately assess the potential presence of rare plants occurring within the site. However, the draft MND does not provide any further information regarding this subsequent spring survey. In order to more accurately determine the presence of rare plants and potential impacts that would occur to them as a result of the project, the Wildlife Agencies recommend performing protocol rare plant surveys during the spring and prior to finalizing the MND.

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Mr. Marc Cass (FWS/CDFW-SDG-17B0047-17CPA0035)

- 3. It is unclear in the draft MND how many acres on the RICC site are proposed to be impacted and if the riparian habitat associated with Santa Maria Creek will be avoided. Mitigation measure BIO-1 suggests that an open space or conservation easement with a 50 to 200 foot buffer will be created and the narrative checklist items a and c describe a buffer of 200 feet between the wetlands and all proposed development in order to conserve NNG and wetlands, respectively. The exact width and location of the mitigation and the number of acres proposed to be conserved are unclear in the draft MND and are absent from Figure 6. Figure 6 of the MND does not illustrate an adequate riparian buffer easement area as described in the narrative and indicates recreational structures and development encompassing the buffer described in BIO-1. The Wildlife Agencies do not agree that the construction and subsequent use of a softball field or any walking pathways (see Figure 6 of the draft MND) are compatible with an appropriate wetland or riparian buffer as described in the RPO or as avoidance of biological resources. The Wildlife Agencies strongly recommend avoiding all project impacts (including walking pathways) to riparian habitat, maximizing the buffer between riparian habitat and recreation areas, and appropriately delineating between the final conserved area and recreation area to prevent encroachment into the conserved area. The final MND should clarify and clearly illustrate the configuration of the buffer and how the habitat contained within it will be conserved. Riparian habitats are considered Tier I habitat types in the draft NCMSCP due to their relative rarity and value to sensitive species. Therefore, the Wildlife Agencies recommend that all unavoidable impacts to riparian habitat be mitigated at a minimum 3:1 ratio in conformance with the County's Resource Protection Ordinance (RPO).
- 4. It appears that Figure 6 of the draft MND illustrates that more than 0.6 acres of NNG will be impacted on the RICC site as a result of the construction and use of a softball field, walking pathways, skate park, etc. The amount of impacts and location of the impacts to NNG should be clearly depicted in the final MND. Mitigation measure *BIO-2* currently requires impacts to 0.6 acres of NNG on the RICC site and 0.6 acres at the replacement parcel in Julian be mitigated at a 0.5:1 ratio. Because the proposed remaining amount of NNG will not contribute as significant functioning habitat for wildlife species due to the high degree of fragmentation if conserved separately, and the site is not in the PAMA under the draft NCMSCP, we recommend that all 4.2 acres of NNG at the RICC site (3.6 acres of NNG and 0.7 acres of NNG: broad leaf dominated) be mitigated through the purchase of off-site credits at a Wildlife Agencies approved bank or contribution to an already established conserved parcel with a Wildlife Agencies approved land management plan and endowment.

We recommend that all impacts to NNG be mitigated at a minimum 1:1 ratio. The NNG on site meets the definition of Sensitive Habitat Lands under the RPO because of the importance of grassland in this area in supporting sensitive species such as Western burrowing owl (*Athene cunicularia hypugaea*), golden eagle (*Aquila chrysaetos*), and other raptors.

5. The distribution of the approximately 100 SD gumplant individuals proposed to be impacted is not provided in the draft MND. The Wildlife Agencies recommend avoidance of the plants if feasible based on the distribution. Mitigation measure *BIO-3* requires that impacts to 100 SD gumplant individuals be mitigated at a 3:1 ratio. Thus, 300 individual plants will be purchased and planted on a County-approved site prior to the issuance of any grading or improvement plans. The Wildlife Agencies recommend providing a figure depicting the approximate distribution of the SD gumplant individuals and revising the measure to include the specific location for the planting, that the work will be performed by

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a qualified biologist with experience in restoration of southern California ecosystems and native plant revegetation techniques, and that the individuals will be planted in a similar habitat type and at a density similar to what was found at the impact site.

- 6. Mitigation measures BIO-1, BIO-2, and BIO-3 should include preparation and implementation of a management and monitoring plan (MMP), including a funding commitment, for any on- and/or off-site biological open-space or conservation easements. An appropriate natural lands management organization, subject to approval by the Department, should be identified. The MMP should outline biological resources on the site, provide for monitoring of biological resources, address potential impacts to biological resources, and identify actions to be taken to eliminate or minimize those impacts. A Property Analysis Record (PAR), or PAR-equivalent analysis, should be completed to determine the amount of funding needed for the perpetual management, maintenance, and monitoring of the biological conservation easement areas by the natural lands management organization. It should be demonstrated that the proposed funding mechanism would ensure that adequate funds would be available on an annual basis to implement the MMP. The natural lands management organization should submit a draft MMP, PAR results, and proposed funding mechanism to the Department for review and approval prior to initiating construction activities. The final plan should be submitted to the Department and the funds for implementing the MMP transferred within 90 days of receiving approval of the draft plan.
- 7. The Wildlife Agencies strongly recommend that vegetation clearing, grading, and construction activities occur outside of the avian breeding season as defined in the draft MND (February 15 through August 31). In the final MND, mitigation measure *BIO-4* should include more detailed contingencies for any project activities occurring during the nesting bird season to avoid project impacts to nesting birds. If avoidance of the avian breeding season is not feasible, the Wildlife Agencies recommend that the pre-construction surveys noted in the mitigation measure be conducted specifically by a qualified biologist with experience in conducting breeding bird surveys to detect protected native birds occurring in suitable nesting habitat that is to be disturbed and (as access to adjacent areas allows) any other such habitat within the defined 500 foot buffer.

The draft MND proposes a 300-foot buffer be established between the nesting bird and the construction activities if nesting migratory birds are detected on site during the avian breeding season. The Wildlife Agencies recommend a minimum buffer of 500 feet for raptor species. However, reductions in the nest buffer distance may be appropriate depending on the avian species involved, ambient levels of human activity, screening vegetation, or possibly other factors. We also recommend revising the measure to reflect that a qualified biologist (with the same experience as stated above) make the determination if the nesting birds have fledged before construction activities resume within the previous buffer area. We recommend that all pre-construction surveys for raptors and general birds occur within 72 hours prior to the start of project impacts to minimize the likelihood that nests are established between the final surveys and the beginning of any habitat disturbances.

8. The Wildlife Agencies recommend that prior to the occurrence of project impacts, appropriate fencing and/or flagging be installed to delineate the limits of construction and any approved staging areas to protect sensitive biological resources, especially riparian areas that are to be avoided. All staging and construction areas should be checked daily for entrapment of small animals in excavations, equipment, or hollow materials by a qualified

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biological monitor. We also recommend that project personnel, including all contractors working on site, be instructed on the sensitivity of the habitats and species that inhabit the area.

- 9. The Wildlife Agencies recommend shielding any temporary or permanent lights and directing them away from the native vegetation communities as increases in lighting levels can increase predation risks and disrupt normal wildlife behaviors.
- 10. Figure 6 of the draft MND shows potential landscaping features. The Wildlife Agencies recommend native plants be used to the greatest extent feasible in landscaped areas adjacent to and/or near mitigation/open space areas and/or wetland/riparian areas. The applicant should not plant, seed, or otherwise introduce invasive exotic plant species to landscaped areas adjacent and/or near native habitat areas. Exotic plant species not to be used include those species listed on the California Invasive Plant Council's (Cal-IPC) Invasive Plant Inventory (http://www.cal-ipc.org). This list includes such species as: pepper trees, pampas grass, fountain grass, ice plant, myoporum, black locust, capeweed, tree of heaven, periwinkle, sweet alyssum, English ivy, French broom, Scotch broom, and Spanish broom. In addition, landscaping adjacent to native habitat areas should not use plants that require intensive irrigation, fertilizers, or pesticides. Water runoff from landscaped areas should be directed away from mitigation/open space and/or wetland/riparian areas and contained and/or treated within the development footprint.
- 11. The draft MND states that the federally endangered San Diego fairy shrimp (*Branchinecta sandiegonensis*, SD fairy shrimp) were not detected during protocol surveys conducted in 2015 through 2016. The Wildlife Agencies typically consider the results of biological surveys to be current for up to 1 year. If the project has not begun construction within this 1 year span, protocol surveys should be repeated because they may not detect individual SD fairy shrimp in a particular year even when viable cysts are present due to a potential low hatching percent in a given pool (Service 2008). Additionally, SD fairy shrimp have been detected in vernal pools formerly located at the Ramona library site, which is adjacent to the RICC site. In the event that future surveys detect SD fairy shrimp or any other federally listed species, the Service recommends that our office be contacted for further coordination in order to ensure compliance with the Act.
- 12. The draft MND states that there is potentially suitable habitat for vernal pool branchiopods present on the RICC site and that the majority of the features surveyed were characterized as road-rut type depressions, void of vegetation. However, it is unclear if the site supports vernal pool plant species in the depressions particularly because plant surveys were not conducted during the spring when these species would be more detectable. Vernal pools support unique and sensitive plant species such as the federally endangered and State-listed endangered San Diego button-celery [Eryngium aristulatum var. parishii (TAIC and EDAW 2005)]. Urbanization, degradation by off-road vehicle activity, agricultural practices, and draining of lands have cumulatively resulted in estimated losses of vernal pools as high as 96% in San Diego County as of 1990 (TAIC and EDAW 2005). The Ramona area in particular has been subject to small parcel land subdivisions resulting in small lot residential and commercial development where vernal pools and their habitat historically occurred (TAIC and EDAW 2005). Therefore, the Wildlife Agencies recommend clarifying if vernal pools supporting vernal pool obligate plant species are present on the RICC site. We also recommend that unavoidable impacts to vernal pools be mitigated at a minimum ratio of 3:1 (this shall include a minimum 1:1 creation component,

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while restoration/ enhancement of existing wetlands may be used to make up the remaining requirements for a total 3:1 ratio) as specified in the RPO.

We appreciate the opportunity to comment on the draft MND. If you have questions regarding this letter, please contact Eric Hollenbeck of the Department at 858-467-2720 or Emily Cate of the Service at 760-431-9440, extension 252.

Sincerely,

for Karen A. Goebel Assistant Field Supervisor U.S. Fish and Wildlife Service

Gail K. Sevrens Environmental Program Manager California Department of Fish and Wildlife

cc:

Office of Planning and Research, State Clearinghouse, Sacramento

LITERATURE CITED

[TAIC] Technology Associates International Corporation and [EDAW] Edaw, Inc. 2005. Ramona Vernal Pool Conservation Study: Ramona, California. Prepared for: County of San Diego Department of Planning and Land Use. January 2005.

[Service] U.S. Fish and Wildlife Service. 2008. San Diego Fairy Shrimp 5-Year Review: Summary and Evaluation. Unpublished.

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Comment Letter 2



Department of Toxic Substances Control

Matthew Rodriquez Secretary for Environmental Protection Barbara A. Lee, Director 5796 Corporate Avenue Cypress, California 90630



Edmund G. Brown Jr. Governor

December 22, 2016

Mr. Marc Cass Project Manager Department of General Services County of San Diego 5560 Overland Avenue Ramona, California 92065

INITIAL STUDY AND PROPOSED MITIGATED NEGATIVE DECLARATION (ND) FOR RAMONA INTERGENERATIONAL COMMUNITY CAMPUS PROJECT (SCH# 2016121008)

Dear Mr. Cass:

The Department of Toxic Substances Control (DTSC) has reviewed the subject ND. The following project description is stated in the ND: "Main Project Site: Along State Route (SR) 67 (otherwise known as Main Street) between 12th Street and 13th Street in the downtown area of the unincorporated community of Ramona in San Diego County. Ramona Replacement Parcel: Along Olive Street between Pine Street and Maple Street in the downtown area of the unincorporated community of Ramona in San Diego County. Julian Replacement Parcel: Along Holland Glen Road near its intersection with Banner Road in the downtown area of the unincorporated community of Julian in San Diego County. Upon the acquisition of the Caltrans parcels, the main project site would be developed as the Ramona Intergenerational Community Campus (RICC or proposed project) that includes the following facilities: 1) 12,500 square-foot senior facility; 2) 5,000 square-foot adult day care center; 3) 14,000 square-foot community gymnasium and teen café; 4) 20,000 square-foot childcare center; 5) 10,000 squarefoot family resource center; 6) 3,660 square-foot community support center; 7) approximately 230 parking spaces; and 8) various infrastructure improvements to support the new facilities (Figure 6, RICC Conceptual Site Plan)."

Based on the review of the submitted document DTSC has the following comments:

 The ND should identify and determine whether current or historic uses at the project site may have resulted in any release of hazardous wastes/substances. A Phase I Environmental Site Assessment may be appropriate to identify any recognized environmental conditions.

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Mr. Marc Cass December 22, 2016 Page 2

- 2. If there are any recognized environmental conditions in the project area, then proper investigation, sampling and remedial actions overseen by the appropriate regulatory agencies should be conducted prior to the new development or any construction.
- If the project plans include discharging wastewater to a storm drain, you may be required to obtain an NPDES permit from the overseeing Regional Water Quality Control Board (RWQCB).
- 4. The ND states, "The County shall not commence grading the main project site until the vapor survey for the Ramona Texaco at 1210 Main Street is completed, and a determination is made as to the risk to worker's health and safety." As far as the project site is proposed for the development of residential purposes or sensitive uses (e.g., 12,500 square-foot senior facility; 5,000 square-foot adult day care center; 14,000 square-foot community gymnasium and teen café; and 20,000 square-foot childcare center), evaluation of potential vapor intrusion risk for sensitive uses in the future is necessary rather than just workers' health and safety. The proposed occupants would be senior citizens, teens and children. Adequate mitigation measures or cleanup to unrestricted use should be obtained prior to the development of the site.
- 5. The ND describes the Main Project Site as: "The southeastern portion of the main project site includes two 0.69-acre parcels currently owned by Caltrans (APN #281-191-03 and APN #281-191-02). These parcels were formerly operated as a Caltrans vehicle service and maintenance yard and currently contain a former sea cargo container and no other structures." The historical use of this area includes vehicle service and maintenance which are recognized environmental conditions. Proper evaluation, investigation and mitigation measures, if necessary, should be implemented.
- 6. The Main Project Site further describes in the ND, "The rest of the main project site includes five vacant parcels that are located to the north of the Caltrans parcels and the Ramona Public Library." Historical use of these vacant parcels should be evaluated. If there is any potential presence of hazardous constituents, further evaluation, investigation and mitigation, if necessary, should be implemented.
- 7. The First Replacement Parcel defines in the ND, "The first replacement parcel is a 0.5-acre parcel that is located approximately 900 feet north of the main project site in the community of Ramona (APN #281-122-18) (Figure 4, Ramona Replacement Parcel). This parcel currently contains a lumber operation." Lumbar . . . cinders." Wood preservatives contain volatile organic compounds (VOCs) and other hazardous constituents. This area should be investigated and remediated, if necessary.

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Mr. Marc Cass December 22, 2016 Page 3

- The ND further states, "The second replacement parcel is a 0.65-acre parcel that is located approximately 12 miles east of the main project site in the unincorporated community of Julian (APN #291-122-18) (Figure 5, Julian Replacement Parcel). This parcel is currently vacant [1]. cinders." Historical uses of this vacant parcel should be evaluated, and if any recognized environmental conditions exist in the project area, then proper investigation, sampling and remedial actions overseen by the appropriate regulatory agencies should be conducted prior to the new development.
- If during construction/demolition of the project, soil and/or groundwater contamination is suspected, construction/demolition in the area should cease and appropriate health and safety procedures should be implemented. If it is determined that contaminated soil and/or groundwater exist, the ND should identify how any required investigation and/or remediation will be conducted, and the appropriate government agency to provide regulatory oversight.

If you have any questions regarding this letter, please contact me at (714) 484-5476 or email at Johnson.Abraham@dtsc.ca.gov.

Sincerely,

Johnson P. Abraham Project Manager Brownfields Restoration and School Evaluation Branch Brownfields and Environmental Restoration Program - Cypress

kl/sh/ja

See next page. CC:

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Mr. Marc Cass December 22, 2016 Page 4

cc: Governor's Office of Planning and Research (via e-mail) State Clearinghouse P.O. Box 3044 Sacramento, California 95812-3044 <u>State clearinghouse@opr.ca.gov</u>

> Mr. Guenther W. Moskat, Chief (via e-mail) Planning and Environmental Analysis Section CEQA Tracking Center Department of Toxic Substances Control <u>Guenther.Moskat@dtsc.ca.gov</u>

Mr. Dave Kereazis (via e-mail) Office of Planning & Environmental Analysis Department of Toxic Substances Control Dave.Kereazis@dtsc.ca.gov

Mr. Shahir Haddad, Chief (via e-mail) Schools Evaluation and Brownfields Cleanup Brownfields and Environmental Restoration Program - Cypress Shahir.Haddad@dtsc.ca.gov

CEQA# 2016121008

DEPARTMENT OF TRANSPORTATION DISTRICT 11, DIVISION OF PLANNING 4050 TAYLOR ST, M.S. 240 SAN DIEGO, CA 92110 PHONE (619) 688-6960 FAX (619) 688-4299 TTY 711 www.dot.ca.gov

January 4, 2017

11-SD-67 PM 24.17 Ramona Intergenerational Center MND

Mr. Marc Cass County of San Diego Planning and Development Services 5560 Overland Avenue San Diego, CA 92123

Dear Mr. Cass:

The California Department of Transportation (Caltrans) has received the Mitigated Negative Declaration (MND) for the Ramona Intergenerational Center Project, located adjacent to State Route 67 (SR-67) between 12th and 13th Streets. Caltrans would like to provide the following comments:

The existing curb ramps located at 12th and 13th Street must be upgraded to the current American with Disabilities Act (ADA) standards. A construction detail sheet will be needed to show elevations and slopes of the proposed ADA curb ramp to show that it meets Caltrans DIB 82-04 guidelines. Please refer to 2015 Standard Plan A88A to A88B. No pedestrians will be allowed to cross SR-67 (Main Street) fronting the proposed Project. (http://www.dot.ca.gov/hq/oppd/dib/dib82-04.pdf).

Work performed within Caltrans right-of-way (R/W) to complete ADA improvements will require discretionary review and approval by Caltrans. An encroachment permit will be required for any work within the Caltrans R/W prior to construction.

MITIGATION MEASURES for cumulative impacts: States that "Payment of the required Traffic Impact Fee (TIF) would mitigate the Project's cumulative impact to below a level of significance" Please clarify.

If you have any questions on the comments Caltrans has provided, please contact Roy Abboud of the Development Review Branch at (619) 688-6968 or roy.abboud@dot.ca.gov.

Sincerely

JACOB M ARMSTRONG, Chief Development Review Branch

Serious drought. Help save water!

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"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"



Marko Medved, P.E. DIRECTOR PHONE 858-694-2527 FAX 858-467-9283 DEPARTMENT of GENERAL SERVICES 5560 OVERLAND AVENUE, SUITE 410, SAN DIEGO, CA 92123 LOU CAVAGNARO, P.E. ASSISTANT DIRECTOR PHONE 858-694-3885 FAX 858-467-9283

DRAFT MITIGATED NEGATIVE DECLARATION

Project Name: Ramona Intergenerational Community Campus Project

Project Number(s): 1018658 and 1018659

This Document is Considered Draft Until it is Adopted by the Appropriate County of San Diego Decision-Making Body.

This Mitigated Negative Declaration is comprised of this form along with the Environmental Initial Study that includes the following:

- a. Initial Study Form
- b. Environmental Analysis Form and attached extended studies for Air Quality and Greenhouse Gases, Biology, Cultural, Hazardous Materials, Hydrology and Water Quality.
- 1. California Environmental Quality Act Mitigated Negative Declaration Findings:

Find that this Mitigated Negative Declaration reflects the decision-making body's independent judgment and analysis, and that the decision-making body has reviewed and considered the information contained in this Mitigated Negative Declaration and the comments received during the public review period; and that revisions in the project plans or proposals made by or agreed to by the project applicant would avoid the effects or mitigate the effects to a point where clearly no significant effects would occur; and, on the basis of the whole record before the decision-making body (including this Mitigated Negative Declaration), that there is no substantial evidence that the project as revised will have a significant effect on the environment.

2. Required Mitigation Measures:

Refer to the attached Environmental Initial Study for the rationale for requiring the following measures:

A. BIOLOGICAL RESOURCES: Implementation of the following mitigation measures would reduce potential biological impacts to less than significant levels:

- **BIO-1:** Prior to grading on the main project site, the County shall mitigate impacts to 1.65 acres of jurisdictional wetlands/riparian habitat and 10-foot wide (287 linear feet) of non-wetland intermittent stream channel through the creation of an open- space or conservation easement that contains a continuous wetland buffer of 50 to 200 feet in width between the wetlands and all proposed development. The wetland buffer shall be preserved through a land conservation easement and shall include the erection of a permanent fence along the edge of the wetland buffer. The creation of the buffer shall be in concurrence with the mitigation plan accepted by the Wildlife Agencies.
- **BIO-2:** Impacts to 0.6 acres of non-native grassland on the main project site and 0.6 acres to be impacted at the Julian replacement parcel to be mitigated at a 0.5:1 ratio. Prior to the issuance of any grading or improvement plans, 0.6 acres of non-native grassland shall be purchased on a County-approved site.
- **BIO-3:** Impacts to 100 individual San Diego gumplants to be mitigated at a 3:1 ratio. Prior to the issuance of any grading or improvement plans on the Julian replacement parcel, 300 San Diego gumplants shall be purchased and planted on a County-approved site.
- **BIO-4:** If project-related work is to occur during the avian breeding season (15 February 31 August), then pre-construction protocol level surveys for migratory birds shall be performed to determine the status of breeding birds on-site and within 500-feet of the site. If nesting migratory birds are detected on-site or within 500-feet of the site, a 300-foot buffer shall be established between the nesting bird and the construction activities. Once the nesting birds have fledged, construction activities may resume within the previous buffer area.
 - **B. CULTURAL RESOURCES:** Implementation of the following mitigation measures would reduce potential impacts to cultural resources to less than significant levels:
- **CUL-1:** Pre-Construction
 - o 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 the 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, nofurther 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 the 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 §5097.98, CEQA §15064.5 and Health & Safety Code §7050.5 shall be followed in the event that human remains are discovered o Rough Grading

Upon completion of Rough Grading, a monitoring report shall be prepared identifying whether resources were encountered.

o Final Grading

A final report shall be prepared substantiating that earth-disturbing activities are completed and whether cultural resources were encountered.

o 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

- **D. HAZARDOUS MATERIALS:** Implementation of the following mitigation measures would reduce potential impacts to hazardous materials to less than significant levels:
- HAZ-1: The County shall not commence grading the main project site until the vapor survey for the Ramona Texaco at 1210 Main Street is completed, and a determination is made as to the risk to worker's health and safety. Once the health risk assessment is complete, the County shall follow the recommendations outline in the DEH letter dated March 13, 2005, which include: 1) remove the sea cargo container on APN 281- 191-03 and 2) upon redevelopment, enter the Voluntary Assistance Program for oversight of management of petroleum-impacted soil.
- **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.
- **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.
- **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 the 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.

- **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.
- **HAZ-6:** Prior to excavation or construction activities, the County shall conduct soil sampling in order to assess potential human health and environmental risk.

E. WATER QUALITY: Implementation of the following mitigation measures would reduce potential impacts to water quality to less than significant levels:

- **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.
- A Major Stormwater Management Plan (SWMP) shall be prepared in compliance WQ-2: 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 detail 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 guality issues of receiving waters, and site constraints in selecting and located LID design practices and IMPs.

- **F. TRAFFIC**: Implementation of the following mitigation measures would reduce potential impacts to traffic to less than significant levels:
- **TRA-1:** At the issuance of building permits, the applicant shall pay the required Traffic Impact Fee (TIF) to the TIF program.

G. HYDROLOGY: Implementation of the following mitigation measures would reduce potential impacts to hydrology to less than significant levels:

HYD-1: Prior to project approval, the County 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.

ADOPTION STATEMENT: This Mitigated Negative Declaration was adopted and the above California Environmental Quality Act findings made by the County Board of Supervisors on January 24, 2017.

MITIGATION MONITORING AND REPORTING PROGRAM

RAMONA INTERGENERATIONAL COMMUNITY CAMPUS PROJECT

Mitigation measures have been identified in the Initial Study/Mitigated Negative Declaration for the Ramona Intergenerational Community Campus Project to reduce or avoid potential environmental impacts. In order to ensure compliance, the following mitigation monitoring program has been formulated. This program provides a checklist of who is responsible for the mitigation, when the mitigation will occur and the measure to document compliance.

Mitigation Measure/Project Design Element	Implementation Responsibility	Timing	Compliance Action	Verification of Compliance (Date/Notes)
Mitigation Measures				
BIO-1: Prior to grading on the main project site,	County	No more than		
the County shall mitigate impacts to 1.65 acres of	Department of	30 days before initial		
jurisdictional wetlands/riparian habitat and 10-foot	General	grading		
wide (287 linear feet) of non-wetland intermittent	Services			
stream channel through the creation of an open-				
space or conservation easement that contains a				
continuous wetland buffer of 50 to 200 feet in				
width between the wetlands and all proposed				
development. The wetland buller shall be				
and shall include the erection of a permanent				
fence along the edge of the wetland buffer. The				
creation of the buffer shall be in concurrence with				
the mitigation plan accepted by the Wildlife				
Agencies.				
	0 /			
BIO-2: Impacts to 0.6 acres of non-native	County	Prior to the issuance of		
grassiand on the main project site and 0.6 acres	Department of	grading and		
to be impacted at the Julian replacement parcel to	General	improvement plans		
of any grading or improvement plans. 0.6 acres of	Services			
non-native grassland shall be purchased on a				
County-approved site.				

Mitigation Measure/Project Design Element	Implementation Responsibility	Timing	Compliance Action	Verification of Compliance (Date/Notes)
Mitigation Measures (cont.)				
BIO-3: Impacts to 100 individual San Diego gumplants to be mitigated at a 3:1 ratio. Prior to the issuance of any grading or improvement plans on the Julian replacement parcel, 300 San Diego gumplants shall be purchased and planted on a County-approved site.	County Department of General Services	Prior to the issuance of grading and improvement plans		
BIO-4: If project-related work is to occur during the avian breeding season (15 February – 31 August), then pre-construction protocol level surveys for migratory birds shall be performed to determine the status of breeding birds on-site and within 500-feet of the site. If nesting migratory birds are detected on-site or within 500-feet of the site, a 300-foot buffer shall be established between the nesting bird and the construction activities. Once the nesting birds have fledged, construction activities may resume within the previous buffer area.	County Department of General Services	Preconstruction		
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:	County Department of General Services	Prior to the issuance of grading and improvement plans/during preconstruction/ during construction		

Mitigation Measure/Project Design Element	Implementation Responsibility	Timing	Compliance Action	Verification of Compliance (Date/Notes)
Mitigation Measures (cont.)			•	· · · · ·
 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. 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 	County Department of General Services			

Mitigation Measure/Project Design Element	Implementation Responsibility	Timing	Compliance Action	Verification of Compliance (Date/Notes)
Mitigation Measures (cont.)				
checks of the fencing to confirm	County		0	0
that it remains in good repair.	Department of			
 If cultural resources are identified: 	General			
 Both the Project 	Services			
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				
the 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.				
 Isolales and non- significant deposite shall 				
be minimally decumented				
in the field. Should the				
in the held. Onould the				
significant denosite not he				
collected by the Project				
Archaeologist the				
Kumevaav Native				
American monitor (if				
materials are of Native				

Mitigation Measure/Project Design Element	Implementation Responsibility	Timing	Compliance Action	Verification of Compliance (Date/Notes)
Mitigation Measures (cont.)				
Mitigation Measures (cont.) • 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	County Department of General Services			Verification of Compliance (Date/Notes)
 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 				

Mitigation Measure/Project Design Element	Implementation Responsibility	Timing	Compliance Action	Verification of Compliance (Date/Notes)
Mitigation Measures (cont.)				
HAZ-1 : The County shall not commence grading the main project site until the vapor survey for the Ramona Texaco at 1210 Main Street is completed, and a determination is made as to the risk to worker's health and safety. Once the health risk assessment is complete, the County shall follow the recommendations outline in the DEH letter dated March 13, 2005, which include: 1) remove the sea cargo container on APN 281- 191-03 and 2) upon redevelopment, enter the Voluntary Assistance Program for oversight of management of petroleum-impacted soil.	County Department of General Services	Prior to issuance of a grading permit.		
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.	County Department of General Services	During construction.		
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.	County Department of General Services	During construction.		
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	County Department of General Services	Preconstruction.		

Mitigation Measure/Project Design Element	Implementation Responsibility	Timing	Compliance Action	Verification of Compliance (Date/Notes)
Mitigation Measures (cont.)				
prepared and included in the SMP. Hazardous materials spill kits shall be maintained on-site for small spills. A copy of the 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.				
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.	County Department of General Services	Preconstruction		
HAZ-6 : Prior to excavation or construction activities, the County shall conduct soil sampling in order to assess potential human health and environmental risk.	County Department of General Services	Preconstruction		
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.	County Department of General Services	Preconstruction		

Mitigation Measure/Project Design Element	Implementation Responsibility	Timing	Compliance Action	Verification of Compliance (Date/Notes)
Mitigation Measures (cont.)				
WQ-2: A Major Stormwater Management Plan (SWMP) shall be prepared 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 detail 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 located LID design practices and IMPs.	County Department of General Services	Preconstruction		
MM-TRA-1 : At the issuance of building permits, the applicant shall pay the required Traffic Impact Fee (TIF) to the TIF program.	County Department of General Services	At the time of building permit issuance.		

Mitigation Measure/Project Design Element	Implementation Responsibility	Timing	Compliance Action	Verification of Compliance (Date/Notes)
Mitigation Measures (cont.)	· · · · ·			
HYD-2 : Prior to project approval, the County 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.	County Department of General Services	Prior to project approval.		



County of San Diego

MARCO MEDVED, P.E.

Director (858) 694-2527 FAX (858) 467-9283 DEPARTMENT OF GENERAL SERVICES

FACILITIES OPERATIONS FLEET MANAGEMENT MAIL SERVICES PROJECT MANAGEMENT REAL ESTATE SERVICES

5560 OVERLAND AVE., STE. 410, SAN DIEGO, CA 92123-1204

MITIGATED NEGATIVE DECLARATION November 3, 2016

CEQA Initial Study - Environmental Checklist Form (Based on the State CEQA Guidelines, Appendix G)

1. Title; Project Number(s); Environmental Log Number:

Ramona Intergenerational Community Campus Project; 1018658 and 1018659

2. Lead agency name and address:

County of San Diego, Department of General Services Project Management Division 5560 Overland Avenue, Suite 410 San Diego, CA 92123-1294

- a. Contact: Marc Cass, Project Manager
- b. Phone number: (858) 694-2047
- c. E-mail: Marc.Cass@sdcounty.ca.gov.
- 3. **Project location:**

Main Project Site: Along State Route (SR) 67 (otherwise known as Main Street) between 12th Street and 13th Street in the downtown area of the unincorporated community of Ramona in San Diego County.

Ramona Replacement Parcel: Along Olive Street between Pine Street and Maple Street in the downtown area of the unincorporated community of Ramona in San Diego County.

Julian Replacement Parcel: Along Holland Glen Road near its intersection with Banner Road in the downtown area of the unincorporated community of Julian in San Diego County.

4. **Project Applicant name and address:**

County of San Diego, Department of General Services 5560 Overland Drive, Suite 410 San Diego, CA 92123-1294 Contact: Marc Cass, Project Manager

5.	General Plan Community Plan:	Ramona Community Plan
	Land Use Designations:	Main project site: Public/Semi Public Facilities, Rural Commercial, Rural Lands
		Ramona Replacement Parcel: High Impact Industrial
		Julian Replacement Parcel: Medium Impact Industrial
	Density:	N/A
6. Zoning Use Regulation:		Main Project Site: Ramona Village Center Form- Based Code Map 2 - Ramona Village Center: CD Civic District, V4 General District, V2 Rural District, V1 Natural District
		Ramona Replacement Parcel: M54 Industrial
		Julian Replacement Parcel: M52 Industrial
	Minimum Lot Size:	N/A
	Special Area Regulation:	CD, V1, V2, and V4 (Design Standards and Review)

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7. Description of project:

Main Project Site

The main project site is situated within the unincorporated community of Ramona, California, which is located in central San Diego County at the intersection of SR-67 (Main Street) and CA-78 (Figure 1, Regional Map and Figure 2, Vicinity Map). The main project site is approximately 14 acres in size and is bounded by Main Street to the south, Santa Maria Creek and Walnut Street to the north, 12th Street to the east, and 13th Street to the west (Figure 3, Main Project Site). The new Ramona Branch Library borders the main project site to the southwest. The southeastern portion of the main project site includes two 0.69-acre parcels currently owned by Caltrans (APN #281-191-03 and APN #281-191-02). These parcels were formerly operated as a Caltrans vehicle service and maintenance yard and currently contain a former sea cargo container and no other structures. The rest of the main project site includes five vacant parcels that are located to the north of the Caltrans parcels and the Ramona Public Library. Three of these parcels are owned by the County of San Diego (APN #281-182-13, APN #281-182-12, and APN #760-157-49) and two of the parcels are privately owned (APN #281-182-18, and APN #281-182-17). Future

development of the site would require acquisition of these parcels but is not included as part of this project.

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Replacement Parcels

The County of San Diego proposes to acquire the two Caltrans parcels in exchange for two replacement parcels that the County is currently under an option agreement to purchase. The first replacement parcel is a 0.5-acre parcel that is located approximately 900 feet north of the main project site in the community of Ramona (APN #281-122-18) (Figure 4, Ramona Replacement Parcel). This parcel currently contains a lumber operation that will be removed prior to Caltrans taking ownership of the replacement parcel and the County taking ownership of the Caltrans parcel. The parcel will then be improved for staging as needed during major events and the temporarily storage of Caltrans equipment and roadway materials (Class II base, rock, sand, guardrail, asphalt, etc.).

The second replacement parcel is a 0.65-acre parcel that is located approximately 12 miles east of the main project site in the unincorporated community of Julian (APN #291-122-18) (Figure 5, Julian Replacement Parcel). This parcel is currently vacant and will be improved for Caltrans staging and storage purposes including the construction of a 1,600 square foot storage barn for dry sand and cinders.

Upon the acquisition of the Caltrans parcels, the main project site would be developed as the Ramona Intergenerational Community Campus (RICC or proposed project) that includes the following facilities: 1) 12,500 square-foot senior facility; 2) 5,000 square-foot adult day care center; 3) 14,000 square-foot community gymnasium and teen café; 4) 20,000 square-foot childcare center; 5) 10,000 square-foot family resource center; 6) 3,660 square-foot community support center; 7) approximately 230 parking spaces; and 8) various infrastructure improvements to support the new facilities (Figure 6, RICC Conceptual Site Plan).

The main project site is subject to the County of San Diego's Ramona Community Plan Area. The Ramona Community Plan Area designates the parcels that make up the main project site as Public/Semi-Public Facilities, Rural Commercial or Rural Lands. The Ramona Community Plan also designates the Ramona replacement parcel as High Impact Industrial. The Julian replacement parcel is subject to the County of San Diego's Julian Community Planning Area, which designates the parcel as Medium Impact Industrial.

The main 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 parcels of the main project site are zoned as CD Civic District, V4 General District, V2 Rural District or V1 Natural District. The Ramona replacement parcel is zoned as M54 Industrial and the Julian replacement parcel is zoned as M52 Industrial.

Table 1 summarizes the various parcels within the main project site and the parcel sizes, as well as the parcels' land use and zoning designations.

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Table 1Main Project SiteAPN Numbers, Acreage, Land Use Designations and Zoning

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APN Number	Acreage	Ramona Community Plan Area General Plan Land Use Designations (Adopted August 2011)	Ramona Village Form Based Code Zoning Designation (Adopted January 2014)	Current Use
281-182-13	0.97 acre	Public/Semi-Public Lands	CD ¹	Unoccupied/
760-157-49	2.27 acres	Public/Semi-Public Lands	CD ¹	Vacant (County
281-182-12	1.58 acres	Public-Semi Public Facilities	CD ¹	owned)
281-182-17	2.20 acres	Rural Commercial & Rural Lands	V4 ² and V2 ³	Unoccupied Vacant (Privately Owned)
281-182-18	5.66 acres	Rural Commercial & Rural Lands	V4 ² , V2 ³ and V1 ⁴	
281-192-03	0.69 acre	Public-Semi Public Facilities	CD ¹	Caltrans Operation
281-191-02	0.69 acre	Public-Semi Public Facilities	CD ¹	Yard

¹ Subject to the Ramona Village District's Public Realm: Civic District Design Standards

² Subject to the Ramona Village District's General District Development Standards

³ Subject to the Ramon Village District's Rural District Development Standards

⁴ Subject to the Ramona Village District's Natural District Development Standards

Table 2 summarizes the two replacement parcels and their sizes as well as the parcel's land use and zoning designations.

Table 2

Replacement Parcels APN Numbers, Acreage, Land Use Designations and Zoning

APN Number	Acreage	General Plan Land Use Designations	Zoning	Current Use
291-122-18	0.65 acre	Medium Impact Industrial	M52 Industrial	Vacant
281-122-18	0.5 acre	High Impact Industrial	M54 Industrial	Industrial Use (lumber yard)

Vehicular Access to the main project site would be provided by three access points connecting to 13th Street and two access points connecting to 12th Street. Both 12th and 13th Streets are County roads that connect to Main Street.

The project proposes the installation of new utilities to support the proposed project's buildings, and the installation of curbs, gutters and sidewalks along 12th and 13th Streets.

The project would be served by the Ramona Municipal Water District (RMWD) for sewer and water.

The following project design considerations are also being implemented to minimize environmental impacts:

- All new proposed project buildings will be constructed as "zero net energy" buildings.
- During grading on active grading sites, water will be applied three times daily.
- Unpaved roads will have water applied three times daily
- All vehicles associated with the proposed project shall reduce speeds to 15 mph on unpaved roads
- Exterior coatings shall use architectural coatings with a VOC content of 150 g/l or less and interior coating shall use 100 g/l or less
- In accordance with County of San Diego Planning and Development Services requirements, the project will require the construction contractor to use a minimum of Tier III equipment.

8. Surrounding land uses and setting:

The community of Ramona is located in a rural setting in the eastern portion of San Diego County. Main Street is a four-lane highway adjacent to the main project site and is the main artery of the community connecting Ramona to Lakeside and Poway to the south, Santa Ysabel and Julian to the north at State Route 79 (SR-79), and Escondido to the west at State Route 78 (SR-78) south.

The main project site is located along Main Street immediately adjacent to the new Ramona Public Library on property designated as Public or Semi-public Facilities, Rural Commercial or Rural Lands. Across Main Street from the library and the Caltrans parcels includes a variety of commercial uses in an area that is zoned General Commercial. This area includes a number of fuel stations and auto repair facilities. Areas to the west of the main project site include industrial uses (SDG&E and Lakeside Furniture), equipment storage, and a large salvage yard in an area designated General Commercial or Rural Commercial. The properties immediately to the north of the main project site contain industrial facilities (Ramona Material Recovery Facility & Transfer Station) or are vacant in an area designated as High Impact Industrial. Areas to the east of the main project site include a church, salvage yard, and a large storage facility in an area also designated as General Commercial or Rural Commercial.

The main project site is located in the Paseo Subarea of the Ramona Village Center. The Paseo Subarea is intended to be the main development area along Main Street and is envisioned to be the civic and commercial core of Ramona. The parcels surrounding the main project site along Main Street are zoned as V5 Center District in the Ramona Village Center and are subject to the Development Standards of the Center District. The parcels surrounding the site that are further north from Main Street are zoned as V4 General District and are subject to the development standards of the General District. The Paseo Subarea is envisioned to one day connect the more established neighborhoods to the south to the Santa Maria Creek in to the north; therefore, the Santa Maria Creek Greenway is planned to accommodate for a trail and/or pathway.

9. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement):

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Permit Type/Action	Agency	
Landscape Plans	County of San Diego	
Minor Grading Permit	County of San Diego	
Site Plan	County of San Diego	
401 Permit - Water Quality Certification	Regional Water Quality Control Board (RWQCB)	
National Pollutant Discharge Elimination System (NPDES) Permit	RWQCB	
General Construction Stormwater Permit	RWQCB	
Water District Approval	Ramona Municipal Water District	
Sewer District Approval	Ramona Municipal Water District	
Fire District Approval	Ramona/CAL Fire Districts	

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED: The environmental factors checked below would be potentially affected by this project and involve at least one impact that is a "Potentially Significant Impact" or a "Less Than Significant With Mitigation Incorporated," as indicated by the checklist on the following pages.

Aesthetics	Agriculture and Forest	Air Quality
	Resources	
Biological Resources	Cultural Resources	Geology & Soils
Greenhouse Gas	🖂 Hazards & Haz. Materials	⊠Hydrology & Water
Emissions		Quality
Land Use & Planning	Mineral Resources	Noise
Population & Housing	Public Services	Recreation
⊠Transportation/Traffic	⊠Utilities & Service	Mandatory Findings of
	Systems	Significance

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DETERMINATION: (To be completed by the Lead Agency) On the basis of this initial evaluation:

- On the basis of this Initial Study, the Department of General Services finds that П the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- On the basis of this Initial Study, the Department of General Services finds that \boxtimes although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- On the basis of this Initial Study, the Department of General Services finds that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

Signature

Maker Marks Medved Printed Na

28 Nov 2016 Date

Director

Title

INSTRUCTIONS ON EVALUATION OF ENVIRONMENTAL IMPACTS

1. A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a projectspecific screening analysis).

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- 2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, Less Than Significant With Mitigation Incorporated, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
- 4. "Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level.
- 5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
 - a) Earlier Analysis Used. Identify and state where they are available for review.
 - b) Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c) Mitigation Measures. For effects that are "Less Than Significant With Mitigation Incorporated," describe the mitigation measures that were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
- 6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should,

where appropriate, include a reference to the page or pages where the statement is substantiated.

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- 7. The explanation of each issue should identify:
 - a) The significance criteria or threshold, if any, used to evaluate each question; and
 - b) The mitigation measure identified, if any, to reduce the impact to less than significance

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I. AESTHETICS -- Would the project:

a) Have a substantial adverse effect on a scenic vista?

- Potentially Significant Impact Less than Significant Impact
- Less Than Significant With Mitigation

Incorporated

No Impact

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Discussion/Explanation:

A vista is a view from a particular location or composite views along a roadway or trail. Scenic vistas often refer to views of natural lands, but may also be compositions of natural and developed areas, or even entirely of developed and unnatural areas, such as a scenic vista of a rural town and surrounding agricultural lands. What is scenic to one person may not be scenic to another, so the assessment of what constitutes a scenic vista must consider the perceptions of a variety of viewer groups.

The items that can be seen within a vista are visual resources. Adverse impacts to individual visual resources or the addition of structures or developed areas may or may not adversely affect the vista. Determining the level of impact to a scenic vista requires analyzing the changes to the vista as a whole and also to individual visual resources.

No Impact: The main project site is located in the center of the community of Ramona in an area that is highly developed. Main Street makes up the southern border of the main project site. The Ramona replacement parcel is located 900 feet to the north of main project site in an area that primarily contains industrial uses. The Julian replacement parcel is located in an area of Julian that is surrounded by a mix of open space, industrial uses, and rural residential. Based on area topography, the main project site and the replacement parcels are not located near or within, or visible from, a scenic vista and will not substantially change the composition of an existing scenic vista in a way that would adversely alter the visual quality or character of the view. Therefore the proposed project will not have an adverse effect on a scenic vista.

The project will not result in cumulative impacts on a scenic vista because the proposed project viewsheds and past, present and future projects within that viewshed were evaluated to determine their cumulative effects. Refer to XVIII. Mandatory Findings of Significance for a list of the projects considered. Those projects listed in Section XVII are not located within the scenic vista's viewshed and will not contribute to a cumulative impact because the proposed project, in combination with those projects will not result in incompatible changes in visual character or degrade the overall visual quality of the area. Therefore, the project will not result in adverse project or cumulative impacts on a scenic vista.

- b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?
- Potentially Significant Impact
- Less than Significant Impact
- Less Than Significant With Mitigation No Impact

Discussion/Explanation:

State scenic highways refer to those highways that are officially designated by the California Department of Transportation (Caltrans) as scenic (Caltrans - California Scenic Highway Program). Generally, the area defined within a State scenic highway is the land adjacent to and visible from the vehicular right-of-way. The dimension of a scenic highway is usually identified using a motorist's line of vision, but a reasonable boundary is selected when the view extends to the distant horizon. The scenic highway corridor extends to the visual limits of the landscape abutting the scenic highway.

No Impact: The main project site and the Ramona replacement parcel are not located near or visible within the composite viewshed of a State scenic highway and will not damage or remove visual resources within a State scenic highway. The main project site is located on Main Street in the center of the Ramona Village Center and does not contain any scenic views. Similarly, the Ramona replacement parcel is located approximately 900 feet to the north of the main project site and does not contain any scenic views. Main Street (SR-67) is not designated as a state designated scenic highway. The nearest designated scenic highway is located approximately 0.3 miles north of the main project site where SR-67 terminates at the intersection of SR-78 and SR-79. SR-79 is a designated scenic highway between the communities of Ramona and Julian, and the SR-78 which is identified as a County designated scenic highway in the Conservation and Open Space Element of the San Diego County General Plan. These highways are not visible from the main project area or the Ramona replacement parcel. Therefore, the proposed improvements on either site would not have any substantial adverse effect on a scenic resource on land adjacent to or visible from a State Scenic Highway.

The Julian replacement parcel is visible within the composite viewshed of SR-78, which is identified as a County designated scenic highway in the Conservation and Open Space Element of the San Diego General Plan. However, the improvements proposed on the replacement parcel would not create any substantial visible alterations to the visual environment, including landform modification. The proposed improvements are for parking and the construction of a 1,600 square foot, low profile storage barn that will not impact the viewshed from SR-78. Therefore, the project will not alter the existing visual character or quality of the replacement parcel and surrounding area and will not have any adverse effect on a scenic resource or land visible from a State Scenic Highway.

The proposed project will not result in cumulative impacts on a state scenic vista because the proposed project viewshed and past, present and future projects within

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that viewshed were evaluated to determine their cumulative effects. Refer to XVIII. Mandatory Findings of Significance for a list of the projects considered. Those projects listed in Section XVII are not located within the scenic vista's viewshed and will not contribute to a cumulative impact because the main project site and the Ramona replacement parcel are not located within a scenic highway's viewshed and the Julian Replacement parcel does not propose any improvements that would adversely impact the viewshed from SR-78. Therefore, the project will not result in any adverse project or cumulative level effect on a scenic resource within a State scenic highway.

c) Substantially degrade the existing visual character or quality of the site and its surroundings?

Potentially Significant Impact \boxtimes Less than Significant Impact Less Than Significant With Mitigation No Impact Incorporated

Discussion/Explanation:

Less Than Significant Impact: Visual character is the objective composition of the visible landscape within a viewshed. Visual character is based on the organization of the pattern elements line, form, color, and texture. Visual character is commonly discussed in terms of dominance, scale, diversity and continuity. Visual quality is the viewer's perception of the visual environment and varies based on exposure, sensitivity and expectation of the viewers. The existing visual character and quality of the main project site and surrounding areas can be characterized as predominantly vacant with surrounding library, retail, commercial and industrial uses. Mountains are visible to the north and east, acting as a visual background that is smaller in scale.

The main project site is located in the center of the Ramona Village Center. The topography of the site is relatively flat, with an average slope of 5 percent grade. The proposed community center buildings are compatible with the existing environment's visual character and quality for the following reasons: the project does not propose any grading in areas having slopes with a gradient of 25 percent or greater. The community of Ramona does not have high profile buildings to block the surrounding mountain views. The project does not propose construction of any building in excess of 35 feet or more in vertical height which may obstruct any scenic vistas. Therefore, the proposed buildings would not obstruct any views of the surrounding mountains due to vertical height, or change the existing visual character of the surrounding main project site areas.

The existing visual character and quality of the Ramona replacement parcel can be characterized as predominantly industrial with mountains visible to the east, west, and south acting as a visual background that is smaller in scale. This parcel is located in an industrial area that is flat, with an average slope of 5 percent grade. The proposed improvements on this replacement parcel are for parking and storage and will not include the construction of any buildings which may obstruct any scenic

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vistas. Therefore, the proposed improvements would not obstruct any views of the surrounding mountains due to vertical height or change in the existing visual character of the surrounding replacement parcel areas.

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The existing visual character and quality of the Julian replacement parcel can be characterized as predominantly rural with some industrial, rural commercial and residential uses surrounding the parcel. Mountains are visible to the north and south acting as a visual background. This parcel is located in a rural area that is flat, with an average slope of 10 percent grade. The proposed improvements on the parcel are for parking and storage and will include the construction of one 1,600 square foot, low profile storage barn that will not obstruct any scenic vistas or significantly alter the existing landform. Therefore, the proposed improvements would not obstruct any views of the surrounding mountains due to vertical height or change in the existing visual character of the surrounding replacement parcel areas.

The project will not result in cumulative impacts on visual character or quality because the entire existing viewshed and a list of past, present and future projects within that viewshed were evaluated. Refer to XVIII. Mandatory Findings of Significance for a comprehensive list of the projects considered. Those projects listed in Section XVII are located within the viewshed surrounding the project and will not contribute to a cumulative impact for the following reasons: the main project site will not have high profile buildings that will block the surrounding mountain viewshed or will be incompatible with the existing visual character. The proposed improvements on the replacement parcels will also not contribute to a cumulative impacts because the proposed improvements do not include construction of high profile buildings or other visual elements that will degrade the visual character of the existing environment. Therefore, the project will not result in any adverse project or cumulative level effect on visual character or quality on-site or in the surrounding area.

- d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?
 - Potentially Significant Impact 🛛 🖂 Less than Significant Impact
 - Less Than Significant With Mitigation
 No Impact
 Incorporated

Discussion/Explanation:

Less Than Significant Impact: The proposed project on the main project site will use outdoor lighting and is located within Zone B as identified by the San Diego County Light Pollution Code, and located approximately 22 miles from the Palomar Observatory. However, the project will not adversely affect nighttime views or astronomical observations, because the project will conform to the Light Pollution Code (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.

The project will not contribute to significant cumulative impacts on day or nighttime views because the project will conform to the Light Pollution Code. The Code was

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developed by the San Diego County Planning and Development Services and Department of Public Works in cooperation with lighting engineers, astronomers, land use planners from San Diego Gas and Electric, Palomar and Mount Laguna observatories, and local community planning and sponsor groups to effectively address and minimize the impact of new sources light pollution on nighttime views. The standards in the Code are the result of this collaborative effort and establish an acceptable level for new lighting. Compliance with the Code is required prior to issuance of any building permit for any project. Mandatory compliance for all new building permits ensures that this project in combination with all past, present and future projects will not contribute to a cumulatively considerable impact. Therefore, compliance with the Code ensures that the project will not create a significant new source of substantial light or glare, which would adversely affect daytime or nighttime views in the area, on a project or cumulative level. Impacts due to this issue area are considered less than significant.

II. AGRICULTURE AND FORESTRY RESOURCES -- Would the project:

a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance (Important Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, or other agricultural resources, to non-agricultural use?

Potentially Significant Impact

Less than Significant Impact

Less Than Significant With Mitigation 🛛 No Impact

Discussion/Explanation:

No Impact. The main project site and the replacement parcels do 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. Therefore, no agricultural resources including Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance will be converted to a non-agricultural use and no potentially significant project or cumulative level conversion of agricultural resources to a non-agricultural use will occur as a result of this project.

b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?

Potentially Significant Impact		Less than Significant Impact
Less Than Significant With Mitigation	\boxtimes	No Impact

Discussion/Explanation:

No Impact: The main project site is zoned as CD Civic District, V4 General District, V2 Rural District or V1 Natural District. The Julian replacement parcel is zoned as
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M52 Industrial and the Ramona replacement parcel is zoned as M54 Industrial. None of these zones are considered to be agricultural zones. Additionally, neither the main project site's land nor the replacement parcels are under a Williamson Act Contract. Therefore, the project does not conflict with existing zoning for agricultural use, or a Williamson Act Contract.

- c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), or timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?
- Potentially Significant Impact
 Less Than Significant With Mitigation Incorporated
 Less Than Significant With Mitigation
 No Impact

Discussion/Explanation:

No Impact: The main project site and the replacement parcels do not contain forest lands or timberland. The County of San Diego does not have any existing Timberland Production Zones. In addition, the project is consistent with existing zoning and a rezone of the main project site or the replacement parcels is not proposed. Therefore, project implementation would not conflict with existing zoning for, or cause rezoning of, forest land, timberland or timberland production zones.

- d) Result in the loss of forest land, 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 forest land to non-forest use?
 - Potentially Significant Impact
 Less Than Significant With Mitigation
 Incorporated
 Less Than Significant With Mitigation

Discussion/Explanation:

No Impact: The main project site and the replacement parcels do not contain any forest lands as defined in Public Resources Code section 12220(g), therefore project implementation would not result in the loss or conversion of forest land to a non-forest use. In addition, neither the main project site nor the replacement parcels are located in the vicinity of offsite forest resources.

e) Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Important Farmland or other agricultural resources, to non-agricultural use?

Potentially Significant Impact	\boxtimes	Less than Significant Impact
Less Than Significant With Mitigation Incorporated		No Impact

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Discussion/Explanation:

Less than Significant Impact: The surrounding areas within a radius of 1 mile of the main project site and the Ramona replacement parcel do not contain any active agricultural operations or 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. Therefore, no Prime Farmland, Unique Farmland, Farmland of Statewide or Local Importance, or active agricultural operations will be converted to a non-agricultural use.

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The Julian replacement parcel and surrounding area within a radius of a 1/4 mile does have land zoned as A70 Agricultural, but there are no active agricultural operations interspersed with single family residential uses. The surrounding areas are not 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 Agencies. In addition, the proposed improvements to this parcel are for storage and parking and do not propose uses that would significantly change the existing agricultural uses in the area, resulting in a change that could convert agricultural operations to non-agricultural use. Therefore, no potentially significant project or cumulative level conversion of Prime Farmland, Unique Farmland, Farmland or Statewide Importance or Farmland of Local Importance to non-agricultural use will occur as a result of this project. Impacts are less than significant.

III. AIR QUALITY -- Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:

- a) Conflict with or obstruct implementation of the San Diego Regional Air Quality Strategy (RAQS) or applicable portions of the State Implementation Plan (SIP)?
 - Less than Significant Impact Potentially Significant Impact \boxtimes
 - Less Than Significant With Mitigation Incorporated

No Impact

Discussion/Explanation:

Less Than Significant Impact: As discussed in the Air Quality Assessment attached as Appendix A of this IS/MND, dated September 11, 2015, prepared by Valorie L. Thompson of Scientific Resources Associated, the project proposes development that is consistent with the County General Plan designations for the site. The proposed project is also consistent with the zoning, and would therefore not conflict with the land use projections within the RAQS and SIP. The project proposes development that was anticipated in SANDAG growth projections used in development of the RAQS and SIP. Operation of the project will result in emissions of ozone precursors that were considered as a part of the RAQS based on growth projections. As such, the proposed project is not expected to conflict with either the

RAQS or the SIP. In addition, the operational emissions from the project are below the screening levels, and subsequently will not violate ambient air quality standards.

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In summary, the proposed project is consistent with the future build out plans for the project site under the County's General Plan and site zoning and therefore satisfies the Consistency Criterion of the RAQs and SIP. Impacts due to this issue area are considered less than significant.

- b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?
- Potentially Significant Impact
 Less Than Significant With Mitigation Incorporated
 No Impact

Discussion/Explanation:

In general, air quality impacts from land use projects are the result of emissions from motor vehicles, and from short-term construction activities associated with such projects. The San Diego County Land Use Environment Group (LUEG) has established guidelines for determining significance which incorporate the Air Pollution Control District's (SDAPCD) established screening-level criteria for all new source review (NSR) in APCD Rule 20.2. These screening-level criteria can be used as numeric methods to demonstrate that a project's total emissions (e.g. stationary and fugitive emissions, as well as emissions from mobile sources) would not result in a significant impact to air quality. Since APCD does not have screening-level criteria for emissions of volatile organic compounds (VOCs), the use of the screening level for reactive organic compounds (ROC) from the South Coast Air Quality Management District (SCAQMD) for the Coachella Valley (which are more appropriate for the San Diego Air Basin) are used.

Less Than Significant Impact:

Construction

The project proposes minor grading to the main project site that includes cut and fill grading of 500 cubic yards of cut for a duration of approximately one month. The cut and fill would balance on the site. The project then proposes to construct six buildings on the main project site. Table 3, *Construction Schedule and Phasing Ramona Intergenerational Community Campus*, presents a summary of the construction phases associated with the proposed project.

Table 3Construction Schedule and PhasingRamona Intergenerational Community Campus

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Phase	Phase Name	Duration
1	Site Preparation	1 month
2	Grading	2 months
3	Building Construction	9 months (Concurrent with Paving and Architectural Coating)
4	Paving	9 months (concurrent with Building Construction and Architectural Coating)
5	Architectural Coating	5 months (concurrent with building construction and paving)

Grading operation associated with the construction of the project would be subject to County of San Diego's Grading Ordinance, which requires the implementation of dust control measures. In addition, the following project design considerations which constitute best management practices for dust control, architectural coatings, diesel particulate, and construction equipment emissions are also being implemented as part of the proposed project:

- During grading on active grading sites, water will be applied three times daily.
- Unpaved roads will have water applied three times daily
- All vehicles associated with the proposed project shall reduce speeds to 15 mph on unpaved roads
- Exterior coatings shall use architectural coatings with a VOC content of 150 g/l or less and interior coating shall use 100 g/l or less
- In accordance with County of San Diego Planning and Development Services requirements, the project will require the construction contractor to use a minimum of Tier III equipment.

As discussed in the Air Quality Assessment dated September 11, 2015, prepared by Valorie L. Thompson of Scientific Resources Associated (attached as Appendix A), the proposed project's construction emissions were estimated using the CalEEMod Model, Version 2013.2.2. With adherence to the project design considerations to control emissions during project construction (outlined above), project criteria pollutants emissions during the construction phase would be minimal, temporary and localized, resulting in pollutant emissions below the screening-level criteria established by the guidelines for determining significance. Impacts from project construction are less than significant.

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Operation

As discussed in the Air Quality Assessment, the main operational emissions from the proposed project would be associated with traffic accessing the main project site, and with area sources such as energy use and landscaping. Emissions are attributable to the following sources:

- Vehicles from trips generated by the project. Trip generation rates were obtained from the Traffic Impact Analysis (Linscott, Law, and Greenspan September 2015), estimated at 2,204 average daily trips.
- Architectural coatings application for maintenance purposes
- Consumer products use
- Fireplace use fireplaces are assumed to be natural gas
- Landscaping equipment use
- Energy use natural gas

The Air Quality Assessment estimated project operational emissions using the CalEEMod Model, Version 2013.2.2, assuming an operational year of 2020. Emissions were calculated for both summer and winter conditions, as well as for annual operations.

In addition, the Air Quality Assessment conducted a CO "hot spots" evaluation to determine if project-related traffic would form a locally high concentration of CO.

The evaluation of operational air emissions determined that the proposed project emissions would not exceed the screening-level thresholds for project operations, and would therefore not result in a significant impact to the ambient air quality. Furthermore, the CO hot spot analysis determined that the proposed project would not cause or contribute to a violation of the CO standard and would therefore not cause or contribute to a violation of this air quality standard. Impacts due to operational emissions would be less than significant.

As such, the project will not violate any air quality standard or contribute substantially to an existing or projected air quality violation.

c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Potentially Significant Impact	\boxtimes	Less than Significant Impact
Loca Than Significant With Mitigation		

Less Than Significant With Mitigation Incorporated No Impact

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Discussion/Explanation:

San Diego County is presently in non-attainment for the 1-hour concentrations under the California Ambient Air Quality Standard (CAAQS) for Ozone (O₃). San Diego County is also presently in non-attainment for the annual geometric mean and for the 24-hour concentrations of Particulate Matter less than or equal to 10 microns (PM₁₀) under the CAAQS. O₃ is formed when volatile organic compounds (VOCs) and nitrogen oxides (NO_x) react in the presence of sunlight. VOC sources include any source that burns fuels (e.g., gasoline, natural gas, wood, oil); solvents; petroleum processing and storage; and pesticides. Sources of PM₁₀ in both urban and rural areas include: motor vehicles, wood burning stoves and fireplaces, dust from construction, landfills, agriculture, wildfires, brush/waste burning, and industrial sources of windblown dust from open lands.

Less Than Significant Impact:

Construction

The Air Quality Assessment reviewed other projects in the vicinity of the proposed project and identified one project: the Robertson Street Apartments Project, STP13-013. This project is a Site Plan to construct a 60-unit affordable housing apartment complex. The project consists of six two story residential buildings with 10 units each and a 2,200 square feet clubroom and outdoor pool/bbq area. The site is located near the intersection of Pala Street and Robertson Street in the Ramona Community Planning area, within unincorporated San Diego County. It is unknown when this project would be constructed; however, the Robertson Street Apartments site is located approximately 0.75 miles from the main project site, and therefore the combined impact of PM₁₀ would not be substantial. Because impacts would be limited to localized areas and emissions are below the significance thresholds, impacts would be less than cumulatively considerable.

In addition, the emissions budget for 2015 in the SIP, as reported on the ARB's website, includes the following emissions for construction for the San Diego Air Basin:

- Off-Road Equipment: 12.44 tons/day VOC, 26.12 tons/day NOx
- Construction Fugitive Dust: 28.54 tons/day PM10 2.85 tons/day PM2.5

Emissions of nonattainment pollutants for the proposed project would be consistent with the construction emissions evaluated in the RAQs and SIP for construction project and would not be cumulatively considerable. Emissions of PM_{10} would be localized and would not result in a cumulatively considerable impact.

Operation

The Air Quality Assessment concluded that emissions of nonattainment pollutants PM_{10} , $PM_{2.5}$, NO_x , or VOCs would be below the screening-level thresholds for project operations. The project would therefore not result in a cumulatively

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considerable net increase in nonattainment pollutants. The project would also not result in a CO "hot spot." The project would therefore not have a cumulatively significant impact on air quality.

d) Expose sensitive receptors to substantial pollutant concentrations?

Potentially Significant Impact	\square	Less than Significant Impact
Less Than Significant With Mitigation Incorporated		No Impact

Discussion/Explanation:

Air quality regulators typically define sensitive receptors as schools (Preschool-12th Grade), hospitals, resident care facilities, or day-care centers, or other facilities that may house individuals with health conditions that would be adversely impacted by changes in air quality. The County of San Diego also considers residences as sensitive receptors since they house children and the elderly.

Less Than Significant: The Air Quality Assessment conducted for the proposed project found that the project would result in emissions of diesel particulate matter during construction activities at the main project site due to the operation of heavy equipment. Because diesel exhaust particulate matter is considered to be carcinogenic, long-term exposure to diesel exhaust emissions could have the potential to result in adverse health impacts. To evaluate whether project construction could pose a significant impact associated with exposure to diesel exhaust particulate matter to nearby sensitive receptors, a health risk evaluation was conducted on the particulate emissions.

The nearest existing receptors were located for the main project site based on site maps and aerial photographs for the project area. The residential receptors identified are the closest residences. No other sensitive receptors are located in the main project site vicinity. The health risk evaluation assessed the potential for an unacceptable risk at these existing receptors due to exposure to diesel particulate emissions from heavy construction equipment during construction. The U.S. EPA's approved air dispersion model, AERMOD (U.S. EPA 2009), was used to estimate the downwind impacts at the closest receptors to the construction site. Risks were estimated using the Office of Environmental Health Hazard Assessment (OEHHA)'s March 2015 Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments. The health risk evaluation concluded that the risk associated with exposure to diesel particulate from construction of the project is not significant. The health risk evaluation also concluded that vehicular truck traffic associated with proposed project operations would be minor and would not affect nearby sensitive receptors.

The replacement parcels would include staging areas that would be used for equipment and vehicles during Caltrans construction projects. While the staging areas would be used periodically and would not be used continually, it is anticipated that there would be some idling of construction equipment on the replacement COMMUNITY CAMPUS; 1018658 and 1018659 - 22 - RAMONA INTERGENERATIONAL NOVEMBER 2016

parcels. The Ramona replacement parcel is not adjacent to any sensitive receptors and would therefore not have an impact due to emissions of Toxic Air Contaminants associated with vehicle exhaust. The Julian replacement parcel is located north of a residential dwelling, which is uphill from the site. However, because of the use of staging areas is not continuous, emissions of diesel particulate matter due to equipment idling would be minor and would not result in a significant risk to the existing residential dwelling. Results of the risk evaluation and risk calculations are included in Appendix A of this IS/MND.

The health risk evaluation was based on the proposed project's design consideration that requires the construction contractor to have a construction fleet that uses a minimum of ARB certified Tier III equipment. Therefore, with adherence to this project design consideration, impacts to sensitive receptors would be less than significant.

- e) Create objectionable odors affecting a substantial number of people?
- Potentially Significant Impact
 Less Than Significant With Mitigation Incorporated
 Less Than Significant With Mitigation

Discussion/Explanation:

Less Than Significant Impact: The proposed project construction could result in minor amounts of odor compounds associated with diesel heavy equipment exhaust. Because the construction equipment would be operating at various locations throughout the construction site, and because any operation that would occur in the vicinity of existing receptors would be temporary, the Air Quality Assessment determined that impacts associated with odors during construction are not considered significant.

During construction, diesel equipment operating at the site may generate some nuisance odors; however, due to the distance of sensitive receptors to the project site and the temporary nature of construction, odors associated with project construction would not be significant.

The Air Quality Assessment also determined that the proposed project is not considered a source of objectionable odors from operations. The project could produce objectionable odors, which would result from volatile organic compounds, ammonia, carbon dioxide, hydrogen sulfide, methane, alcohols, aldehydes, amines, carbonyls, esters, disulfides dust and endotoxins from the operational phases. However, these substances, if present at all, would only be in trace amounts (less than $1 \mu g/m^3$). Subsequently, no significant air quality–odor impacts are expected to affect surrounding receptors.

The proposed project would not generate objectionable odors that would affect a considerable number of persons or public. Odor impacts are less than significant. Furthermore, the affects of objectionable odors are localized to the immediate

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surrounding area around the main project site and will not contribute to a cumulatively considerable odor.

IV. BIOLOGICAL RESOURCES -- Would the project:

- a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?
- Potentially Significant Impact
 Less than Significant Impact
 Less Than Significant With Mitigation
- Incorporated

Discussion/Explanation:

Less Than Significant Impact with Mitigation:

Special Status Plants

Based on a literature search using: 1) the California Department of Fish and Wildlife California Natural Diversity Database, 2) the California Native Plant Society's Online Inventory of Rare and Endangered Vascular Plants, and 3) the San Diego Plant Atlas; a field reconnaissance site visit by Dudek biologists Danielle Mullen, Kathleen Dayton and Marshall Paymard on August 11, 2015; and a Biological Resources Memo dated August 17, 2015 prepared by Callie Ford, a Dudek staff biologist (attached as Appendix B), the main project site and replacement parcels support a total of six vegetation communities and/or land cover types as outlined in Table 4, *Vegetation Communities*.

Vegetation Community or Land Cover	Main Project Site	Julian Replacement Parcel	Ramona Replacement Parcel
Southern Willow Scrub	1.7		
Non-Native Grassland	3.5	0.6	
Non-Native Grassland –Broad Leaf Dominated	0.7		
Disturbed Habitat	9.0		
Urban/ Developed	0.4		2.1
Total	15.3	0.6	2.1

Table 4Vegetation Communities

Wetlands/Riparian Habitat

A jurisdictional delineation conducted in August 2015 determined there is a 10-foot wide non-wetland unvegetated stream channel (Santa Maria Creek) that flows in the east to west direction location in the northern portion of the main project site. The

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stream channel eventually forms a confluence with Santa Ysabel Creek which eventually flows into the San Dieguito River and ultimately connects to the Pacific Ocean. Thus, the Santa Maria Creek forms a nexus to a traditional navigable water and would be considered a non-wetland waters of the United States and state under the jurisdiction of Army Corps of Engineers (ACOE), Regional Water Quality Control Board (RWQCB) and California Department of Fish and Wildlife (CDFW).

In addition, the northern portion of the main project site along the Santa Maria Creek has 1.65 acres of southern willow scrub, which was evaluated to determine if it meets ACOE, RWQCB, CDFW and San Diego County Resources Protection Ordinance (RPO) for wetlands. Due to the presence of all three wetland indicators, the southern willow scrub is an ACOE/RWQCB wetland, CDFW riparian habitat and a San Diego RPO wetland.

Removal of or impacts to jurisdictional wetlands/riparian habitat (southern willow scrub) and non-wetland intermittent stream channel (Santa Maria Creek) would cause substantial adverse effects, either directly or through habitat modifications. Mitigation to protect and preserve this area in place is required to avoid direct impacts to the wetland. With implementation of mitigation measure **MM-BIO-1**, the impact would be less than significant.

MM-BIO-1 Prior to grading on the main project site, the County shall mitigate impacts to 1.65 acres of jurisdictional wetlands/riparian habitat and 10-foot wide (287 linear feet) of non-wetland intermittent stream channel through the creation of an open-space or conservation easement that contains a continuous wetland buffer of 50 to 200 feet in width between the wetlands and all proposed development. The wetland buffer shall be preserved through a land conservation easement and shall include the erection of a permanent fence along the edge of the wetland buffer. The creation of the buffer shall be in concurrence with the mitigation plan accepted by the Wildlife Agencies.

The west central portion of the main project site also contains a small patch of willows (0.08 acres) that are the result of run-off from the adjacent disturbed habitat. This patch is not associated with a streambed and the surrounding substrate is comprised of riprap, therefore it does not meet the standards of ACOE/RWQCB or County jurisdiction wetlands. This is not considered to be RPO-eligible. However, this patch may be considered riparian habitat by CDFW during the permitting process.

Non-native Grassland

Non-native grassland is considered a sensitive habitat. The main project site contains 4.2 acres of non-native grassland, of which approximately 3.6 acres would be preserved in the 200-foot wetland buffer required in MM-BIO-1, however approximately 0.6 acre would be impacted by the proposed project. The Julian replacement parcel also includes 0.6 acres of non-native grassland that would be impacted by the storage and parking improvements that are part of the proposed project. This represents a significant impact; however, this impact will be reduced to

below a level of significance with implementation of mitigation measure MM-BIO-2, which requires the preservation of off-site non-native grassland habitat at a 0.5:1 ratio for the non-native grassland habitat impacted on the site. Under the County of San Diego Guidelines for Determining Significance, a mitigation ratio of 0.5:1 may be used for non-native grassland loss, so long as the site meets the following criteria: 1) site is located outside of approved Multiple Species Conservation Program (MSCP) plan; 2) site is located outside of the Ramona Grasslands Preserve Area; and 3) site is not occupied by burrowing owls. The main project site and the replacement parcels meet the criteria noted above, so a mitigation ratio of 0.5:1 is appropriate. Preservation of off-site habitat would retain non-native grassland habitat in perpetuity. The 0.6 acre of mitigation that is proposed would occur at a County approved site. With implementation of mitigation measure MM-BIO-2, the impact would be less than significant.

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MM-BIO-2: Impacts to 0.6 acres of non-native grassland on the main project site and 0.6 acres to be impacted at the Julian replacement parcel to be mitigated at a 0.5:1 ratio. Prior to the issuance of any grading or improvement plans, 0.6 acres of non-native grassland shall be purchased on a County-approved site.

The proposed project would also grade and construct on 2.5 acres of developed habitat and 9.0 acres of disturbed habitat. These are not considered to be sensitive habitats.

San Diego Gumplant

A population of approximately 100 individual San Diego gumplant (Grindellia hallii) was found on the Julian replacement parcel. San Diego gumplant is a County of San Diego List A plant and has a California Native Plant Survey rare plant rank of 1B.2, meaning that it is rare, threatened or endangered in California or elsewhere. Under the County of San Diego Guidelines for determining significance, a mitigation ratio of 3:1 may be used for loss of the San Diego Gumplant. Preservation of these plants would be retained in perpetuity. The preservation of 300 plants as mitigation would occur at a County approved site. With implementation of Mitigation Measure **MM-BIO-3**, the impact would be less than significant.

MM-BIO-3 Impacts to 100 individual San Diego gumplants to be mitigated at a 3:1 ratio. Prior to the issuance of any grading or improvement plans on the Julian replacement parcel, 300 San Diego gumplants shall be purchased and planted on a County-approved site.

Special Status Wildlife

Dudek biologists found that there is potentially suitable habitat (i.e., ephemerally wet/ponded features) for vernal pool branchiopods present on the Project site. The habitat features consisted of man-made depressions generally located in the central portion of the Project site. The majority of the features were road-rut type depressions, void of vegetation, that were located on heavily disturbed soils and areas showing past fill depositions (e.g., gravel, blacktop). Because of the existing

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occupied vernal pools present along the Main Street portion of Ramona, it was determined that these features should be surveyed for the federally listed endangered San Diego fairy shrimp (Branchinecta sandiegonensis). Wet and dry season protocol surveys for the fairy shrimp were performed during the 2015/2016 wet/dry season as described below (see Appendix B for the wet/dry season findings).

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Wet Season

The Project site occurs in Survey Zone C according to the United States Fish and Wildlife Service (USFWS) 2015 protocol. During the 2015/2016 wet season the entire survey area was evaluated on-foot and by vehicle to provide 100% visual coverage of the site. Protocol-level surveys and sampling were conducted by Dudek biologists, Brock Ortega (BAO; Permit # TE813545) and Danielle Mullen (DAM; Permit # TE31221B). The site was surveyed 14 times throughout the wet season and an additional nine post-rain event checks were made. Daily precipitation for the site was monitored throughout the 2015/2016 wet season. A biologist searched the entire site within approximately 24 hours following every rain event to identify those features that satisfied the USFWS survey criteria.

Onset of significant rain events (i.e., greater than 0.20 inch cumulative) for the 2015/2016 wet season at the project site began during the storm between November 2 and 5, 2015. Protocol-level sampling commenced on site on November 14, 2015, in accordance with the survey protocol to initiate sampling within 1 week of initial inundation. All habitats (features) on site that met the USFWS inundation criteria (i.e., depth of 3 centimeters (1.2 inches) or greater 24 hours post rainfall) to initiate protocol-level surveys were sampled and USFWS survey forms were completed.

All features were surveyed to confirm inundation (i.e., wet at least 3 centimeters deep) and any inundated features were sampled at approximately 1-week intervals, until dried up or until 120 days of continuous inundation had elapsed. Features that dried up and then refilled were surveyed within 7 days of refilling and survey sampling was reinitiated at the 1-week interval. A schedule of the 2015/2016 survey season is presented in Table 5.

2015/2016 Site Visit Schedule					
Site Visit Number	Staff	Date	Event		
1	BAO	November 6, 2015	Check		
2	BAO	November 11, 2015	Check		
3	BAO	November 16, 2015	Check		
4	BAO	November 28, 2015	Check		
5	DAM	December 14, 2015	Check		
6	BAO	December 21, 2015	Survey		
7	BAO	December 24, 2015	Check/Survey		
8	BAO	December 30, 205	Check/Survey		
9	BAO	January 8, 2015	Survey		
10	BAO	January 15, 2015	Survey		
11	BAO	January 22, 2015	Survey		
12	BAO	January 29, 2016	Survey		
13	BAO	February 1, 2016	Survey		
14	BAO	February 8, 2016	Survey		
15	BAO	February 15, 2016	Survey		
16	BAO	March 9, 2016	Check		
17	BAO	March 11, 2016	Check		
18	BAO	March 31, 2016	Check		
19	DAM	April 13, 2016	Check		
20	BAO	April 20, 2016	Survey		
21	BAO	April 27, 2016	Survey		
22	BAO	May 7, 2016	Check		
23	BAO	May 14, 2016	Survey		
24*	DAM	June 16, 2016	Soil Collection		
Note: DAM = Dar	nielle Mullen				

Table 5 ~~ = 1~~~

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DAM = Danielle Mullen

BOA = Brock Ortega

Dry Season Sampling Survey

Because the basin is a detention basin and appears to stay wet throughout most, if not all of the year due to resident runoff, it was only surveyed when surveyors were on site to perform normal surveying or to conduct post-rain site checks.

Sampling was performed within all features that met the USFWS inundation requirement. During the survey visits all features were inspected for depth; surface area of water; air and water temperature; level of disturbance; and presence of aquatic wildlife. An aquarium net was passed through every feature that met the USFWS inundation requirement. All portions of ponded water were sampled from the bottom to the surface. All information was recorded in the field onto a data sheet as provided in the survey protocol with the most pertinent information (e.g., inundation, fairy shrimp presence/absence, and species identification). Data sheets were completed for every feature that met the minimum USFWS inundation requirement at the time of sampling (Appendix B). Photographs of the features sampled were taken and the locations of the features surveyed and sampled during the 2015/2016 survey were presented

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Dry Season

Soil Sample Collection

Dry season sampling was authorized by USFWS and was conducted according to the current 2015 guidelines. The soil sample collection was conducted by Dudek biologist Danielle Mullen (Permit # TE31221B) on June 16, 2016.

Soil samples were collected from the bottom of six known features using a small 6inch hand trowel to excavate samples "chunks" of substrate from the upper 3 centimeters of soil. The hand trowel was cleaned between each feature prior to collection. Samples were collected equidistantly along two perpendicular transects (lengthwise and widthwise), incorporating the deepest region/s of the feature, and thoroughly sampling the feature surface area. If neither transect passed within the deepest region of the seasonal feature, another sample was taken to specifically include it. The amount of soil collected from each feature was proportional to the size of the feature and follows the direction provided in the USFWS guidelines. All features sampled were less than 24 square meters in size; therefore, no more than 10 samples (<100 milliliters each), totaling 1 liter composite samples per feature were collected.

Immediately after sample collection, the soil was carefully placed into a brown paper lunch-sized bag and labeled according to the feature name. Sample bags from each feature were then placed into another paper bag or box for organization. All of the samples collected from the features were submitted to Charles Black of Ecological Restoration Service in the same day of collection.

Soil Processing and Examination for Cyst Presence

The samples were processed per the USFWS 2015 guidelines, by Charles Black of Ecological Restoration Service (TE835549). The samples were processed per the U.S. Fish and Wildlife Service (USFWS) April 19, 1996 Interim Survey Guidelines to Permittees for Recovery Permits under Section 10(a)(I)(A) of the Endangered Species Act for the Listed Vernal Pool Branchiopods, modified by Ecological Restoration Service as described below. Charles Black is authorized by the U.S. fish and Wildlife Service to process dry samples for the presence of fairy shrimp cysts and to culture cysts to identify to species level as special conditions of his 10(a)(1)(A) permit. Samples were divided into approximately one hundred ml portions until no material remained, except that for two smaller basins with approximately 250 ml of soil collected, samples were divided into three approximately 83 ml portions. These samples were hydrated for 1-2 hours in tap water, then washed through a set of sieves. Material passing through a Number 45 (.0139") USA Standard Testing Sieve, A.S.T.M.E.-11 specification and caught on a Number 70 (.0083") Sieve was rinsed into a container with approximately 50 ml of a saturated brine solution to float organic material, including fairy shrimp cysts. The material floating on the brine was decanted onto a paper filter on a filter funnel, and water was removed through the filter paper by vacuum suction. The material left on

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the paper was examined under a 6.3-570x power Olympus SZX9 Zoom Stereo Microscope. Distinctive fairy shrimp cysts, if present, were individually counted (if less than approximately 50) or estimated (for larger numbers) by examining .25 or .5 subsections of the filter and multiplying the subset by the appropriate factor. The presences of ostracod shells and cladoceran ephippia were also noted in samples.

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Culturing Cysts

No culturing was performed as part of the dry-season effort.

Survey Results

Wet Season

Basin Descriptions

A total of 11 features and 1 detention basin were surveyed as potential suitable habitat for vernal pool branchiopods and were surveyed during the 2015/2016 wet season. All of the features were formed on modified soils that had either been manipulated or deposited on the site. All of these met the minimum inundation requirement and were sampled. Most all of the features sampled on site are considered road ruts, which are depressions that are typically formed by vehicular traffic within or immediately adjacent to roadways, generally lack aquatic vegetation, and are heavily disturbed by vehicles.

Fairy Shrimp Presence/Absence

During the 14 protocol sampling visits, no features were found to support any Branchiopod species during the wet or dry surveys. Thus no special status wildlife species were found on the main Project site or the replacement parcels. Impacts to wildlife species are less than significant.

b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?

	Potentially Significant Impact	Less than Significant Impact
\boxtimes	Less Than Significant With Mitigation	No Impact

Discussion/Explanation:

Incorporated

Less Than Significant Impact With Mitigation Incorporated: As discussed above in Question a, the literature search, reconnaissance site visit and biological memo dated August 17, 2015, determined that the main project site and replacement parcels support a variety of sensitive vegetation communities and land cover types, including 1.65 acres of jurisdictional wetlands/riparian habitat. With the incorporation

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of **MM-BIO-1**, potential impacts to these natural communities would be mitigated to below a level of significance. In addition, the wetland buffer ensures that all development is set back 200 feet to protect the riparian habitat from potential indirect impacts, including noise, light, human encroachment and invasive species.

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The main project site contains trees, which can provide nesting habitat for birds that are protected under the Migratory Bird Treaty Act. Breeding birds can be significantly affected by short-term construction-related noise, which can result in the disruption of foraging, nesting, and reproductive activities. If breeding birds are in areas adjacent to the proposed project site during construction activities, their reproductive activities could be adversely impacted by construction-related noise. Therefore, indirect impacts to nesting birds due to construction-related noise may occur as a result of the proposed project. This potential indirect impact to breeding birds is considered significant and mitigation **(MM-BIO-4)** would be required.

MM-BIO-4 If project-related work is to occur during the avian breeding season (15 February – 31 August), then pre-construction protocol level surveys for migratory birds shall be performed to determine the status of breeding birds on-site and within 500-feet of the site. If nesting migratory birds are detected on-site or within 500-feet of the site, a 300-foot buffer shall be established between the nesting bird and the construction activities. Once the nesting birds have fledged, construction activities may resume within the previous buffer area.

Incorporation of **MM-BIO-4** will bring this potential impact to below a level of significance.

Therefore, project impacts to any riparian habitat or sensitive natural community identified in the County of San Diego Multiple Species Conservation Program, County of San Diego Resource Protection Ordinance, Natural Community Conservation Plan, Fish and Game Code, Endangered Species Act, Clean Water Act, or any other local or regional plans, policies or regulations, are considered less than significant.

c. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

	Potentially Significant Impact	Less than Significant Impact
\square	Less Than Significant With Mitigation	No Impact
\square	Incorporated	Νυπηρατι

Discussion/Explanation:

Less than Significant with Mitigation Incorporated: As discussed above, the main project site contains federally protected wetlands defined by Section 404 of the Clean Water Act that include riparian habitat. A biological reconnaissance survey was conducted by Dudek staff biologists Danielle Mullen, Kathleen Dayton and Marshall Paymard on August 11, 2015 and a wetland delineation was prepared by

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Dudek biologist Callie Ford. The jurisdictional delineation determined the northern portion of the main project site along the Santa Maria Creek has 1.65 acres of southern willow scrub, which is an ACOE/RWQCB wetland, CDFW riparian habitat and a San Diego RPO wetland.

Removal of or impacts to jurisdictional wetlands/riparian habitat (southern willow scrub) and non-wetland intermittent stream channel (Santa Maria Creek) would cause substantial adverse effects, either directly or through habitat modifications. However, with the implementation of **MM-BIO-1**, all impacts will be avoided because federally protected wetlands have been placed in a biological conservation easement with the 200-foot wetland buffer and no significant impacts will occur to federally protected wetlands on the main project site.

No other federally protected wetlands were found on the main project site or the replacement parcels.

- d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?
- Potentially Significant Impact
 Less Than Significant With Mitigation Incorporated
 Less Than Significant With Mitigation
 No Impact

Discussion/Explanation:

Less than Significant Impact with Mitigation Incorporated: An analysis of the County's Geographic Information System (GIS) records, the County's Comprehensive Matrix of Sensitive Species, a site visit by Dudek biologists Danielle Mullen, Kathleen Dayton and Marshall Paymard on August 11, 2015, and a Biological Resources Report dated August 17, 2015 prepared by Callie Ford, Dudek staff biologist, determined that there is no evidence on the main project site or replacement parcels that demonstrates they are an established native resident or migratory wildlife corridor. Therefore, the project's impacts to the movement of any native resident or wildlife species are less than significant. However, MM-BIO-4, above, will further ensure migratory birds nesting on the site will be protected, so that project construction does not disrupt avian breeding or impede the use of avian nursery sites.

e) 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?

Potentially Significant Impact	\square	Less than Significant Impact
Less Than Significant With Mitigation Incorporated		No Impact

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Discussion/Explanation:

Less than significant: The project area is located within the County's draft (unapproved) North County MSCP Downtown Ramona MSCP Downtown Ramona Vernal Pool Planning Area, in which vernal pools have been identified containing fairy shrimp cysts. As discussed in Response IV-a above, wet and dry season protocol surveys for the federally-listed endangered San Diego fairy shrimp (Branchinecta sandiegonensis) were performed on the project site and the surveys found that no features were found to support any Brachiopod species during the wet or dry surveys Since no there are no fairy shrimp occupied vernal pools located on the Project site, impacts would be considered less than significant.

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V. CULTURAL RESOURCES -- Would the project:

- a) Cause a substantial adverse change in the significance of a historical resource as defined in 15064.5?
 - Potentially Significant Impact
 Less Than Significant With Mitigation
 Incorporated
 Less Than Significant With Mitigation

Discussion/Explanation:

Less Than Significant Impact:

Based on an analysis of records and a survey of the main project site and the two replacement parcels by County of San Diego approved archaeologists, Adriane Dorrler and Adam Giacinto, and Native American monitors from Red Tail Monitoring and Research Inc. in July and September 2015, it been determined that there are one or more historical resources within the main project site and the replacement parcels. These resources include a historic age foundation and an alignment of nine eucalyptus trees. A report entitled Cultural Resources Report for the Ramona Intergenerational Community Campus Project, dated September 2015, and prepared by Dudek, evaluated the significance of the historical resources based on a review of historical records including a South Coastal Information Center (SCIC) one-mile buffer records search and literature review (August 5, 2015), Native American information outreach, an intensive-level pedestrian survey, and a resource evaluation. The complete report is attached as Appendix C of this IS/MND.

The Cultural Resources Report found that the historic "L" shape concrete slab foundation was the ruin of a previously extant single-family residence that was previously recorded and evaluated while the residence was still standing. At that time it was determined that the residence was not eligible for the National Register of Historic Places (NRHP), California Register of Historic Places (CRHP) or local register listing. The concrete pad, continues to be not eligible for listing and is not considered a significant resource under CEQA or under the County RPO.

The Cultural Resources Report also determined that the nine eucalyptus trees have been identified as a contributing element to the Main Street Eucalyptus Colonnade,

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which has been nominated for listing in the NRHP. Because the Main Street Eucalyptus Colonnade has been NRHP nominated, it is considered significant under Section 106 of the National Historic Places Act, CEQA and the County RPO. Therefore, the nine eucalyptus trees within the main project site are contributing components to the significance of this historic property and are important under County Guidelines. Any impacts to these trees would be considered a significant effect under CEQA and County Guidelines and mitigation would be required.

The proposed project will not modify the significant historic nine eucalyptus trees and therefore, will not contribute to a potentially significant cumulative impact on historical resources and no impact will be identified.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to 15064.5?



Discussion/Explanation:

Less Than Significant Impact with Mitigation Incorporated:

The project's main project site and replacement parcels were surveyed by a County approved archaeologist Adriane Dorrler and Adam Giacinto in July and September 2015, and it has been determined that there is one archaeological resource present. The resource includes a small, sparse, historic age refuse scatter site within the Julian replacement parcel. This resource was documented in the Cultural Resources Report, entitled Cultural Resources Report for the Ramona Intergenerational Community Campus Project, prepared by Dudek, dated September 2015 (attached as Appendix C).

The Cultural Resources Report evaluated the significance of the archaeological resource based on subsurface testing, analysis of recovered artifacts, and other investigations. The Phase 1 intensive level survey concluded that, based on inspection of the landform and topographic setting, a subsurface deposit was not likely to be present. All cultural material appeared to have washed to the present location from an upslope out of the proposed project's area of potential effect. To assess the subsurface character of the area and the potential to support a subsurface deposit, the Phase 1 survey was augmented by an Extended Phase I shovel probe program. This served to provide information relating to the subsurface character of the site and further demonstrated the absence of buried archaeological deposits.

The archaeological technical study determined that the archaeological resource is not significant pursuant to the CEQA Guidelines, Section 15064.5. Moreover, the resource is not considered significant or "unique" archaeological resources pursuant to CEQA Section 15064.5 or under the County RPO, is not eligible for listing in the CRHR or local register, and is not significant under County RPO. In addition, the loss of this resource cannot contribute to a potentially significant cumulative impact.

In consideration of the presence of recorded historic-era resources (the historic age foundation) in the project area of potential effect, mitigation in the form of an archaeological monitoring program compliant with CEQA and County of San Diego Guidelines shall be implemented to avoid any significant impacts to unanticipated subsurface features or deposits or undiscovered buried archaeological resources as outlined in **MM-CUL-1**.

- **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 is remains in good repair.
 - o 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 the 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 nonsignificant 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 the 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 §5097.98, CEQA §15064.5 and Health & Safety Code §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 earthdisturbing activities are completed and whether cultural resources were encountered.

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- 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.

Thus, with adherence to mitigation measure **MM-CUL-1**, impacts to unanticipated subsurface features or deposits or undiscovered buried archaeological resources would be less than significant.

c) Directly or indirectly destroy a unique geologic feature?

Potentially Significant Impact		Less than Significant Impact
Less Than Significant With Mitigation Incorporated	\square	No Impact

Discussion/Explanation:

San Diego County has a variety of geologic environments and geologic processes which generally occur in other parts of the state, country, and the world. However, some features stand out as being unique in one way or another within the boundaries of the County.

No Impact: The main project site and the replacement parcels do not contain any unique geologic features that have been listed in the County's Guidelines for Determining Significance for Unique Geology Resources nor do the sites support any known geologic characteristics that have the potential to support unique geologic features.

- d) Directly or indirectly destroy a unique paleontological resource or site?
- Potentially Significant Impact
 Less Than Significant With Mitigation
 Incorporated
 No Impact

Discussion/Explanation:

Less Than Significant With Mitigation Incorporated:

A review of the County's Paleontological Resources Maps and data on San Diego's geological formations indicates that the main project site is located on geological formations that have a low probability of containing unique paleontological

resources. The main project site will be graded and there is potential that excavation could occur into undisturbed ground beneath the soil horizons that may cause a significant impact if unique paleontological resources are encountered. Although potential impacts are possible during the grading process, with Adherence to **MM-CUL-1** described above, an archeological monitoring program shall be implemented by the project applicant. During the archeological monitoring program's implementation, the project archaeologist shall work with equipment operators and others involved in the excavation to watch for fossils during the normal course of their duties. In accordance with the Grading Ordinance, if a fossil or fossil assemblage of greater than twelve inches in any dimension is encountered during excavation, all excavation operations in the area where the fossil or fossil assemblage was found shall be suspended immediately, and a qualified Paleontologist shall be retained by the project applicant to inspect the find to determine if it is significant. A Qualified Paleontologist is a person who has, to the satisfaction of the Planning and Development Services Director:

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- A Ph.D. or M.S. or equivalent in paleontology or closely related field (e.g., sedimentary or stratigraphic geology, evolutionary biology, etc.);
- Demonstrated knowledge of southern California paleontology and geology; and
- Documented experience in professional paleontological procedures and techniques.

If the Qualified Paleontologist determines that the fossil or fossil assemblage is significant; a mitigation program involving salvage, cleaning, and curation of the fossil(s) and documentation shall be implemented. If no fossils or fossil assemblages of greater than 12 inches in any dimension are encountered during excavation, a "No Fossils Found" letter will be submitted to the County Planning and Development Services identifying who conducted the monitoring and that no fossils were found. If one or more fossils or fossil assemblages are found, the Qualified Paleontologist shall prepare a report documenting the mitigation program, including field and laboratory methodology, location and the geologic and stratigraphic setting, list(s) of collected fossils and their paleontological significance, descriptions of any analyses, conclusions, and references cited.

Therefore, with the implementation of **MM-CUL-1** and the above project requirements during project grading operations, potential impacts to paleontological resources will be less than significant. Furthermore, the project will not result in a cumulative impact to paleontological resources because other projects that require grading in sensitive paleontological resource areas will be required to have the appropriate level of paleontological monitoring and resource recovery. In addition, other projects that propose any amount of significant grading would be subject to the requirements for paleontological monitoring as required pursuant to the County's Grading Ordinance. Therefore, the project would not result in a significant direct, indirect, or cumulatively significant loss of paleontological resources.

e) Disturb any human remains, including those interred outside of formal cemeteries?

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Potentially Significant Impact	Less than Significant Impact	
Less Than Significant With Mitigation	No Impact	

Discussion/Explanation:

Less than Significant with Mitigation:

Based on an analysis of records and a survey of the property by a County of San Diego approved archaeologists, Adriane Adam Giancola, in August 2015, it is unlikely that the project will disturb any human remains because the project site does not include a formal cemetery or any archaeological resources that might contain interred human remains. However, with implementation of MM-CUL-1 above, an Archaeological Monitoring Program will be required. As part of that program, if human remains are inadvertently discovered, the property owner or their representative shall contact the County Coroner and the 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, as identified by the Native American Heritage Commission, shall be contacted by the County or their representative in order to determine proper treatment and disposition of the 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 Most Likely Descendant regarding their recommendations as required by Public Resources Code Section 5097.98 has been conducted. Public Resources Code §5097.98, CEQA §15064.5 and Health & Safety Code §7050.5 shall be followed. Therefore, with implementation of MM-CUL-1, the impacts to human remains would be less than significant with mitigation.

VI. GEOLOGY AND SOILS -- Would the project:

- a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:
 - i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

Potentially Significant Impact	\boxtimes	Less than Significant Impact
Less Than Significant With Mitigation Incorporated		No Impact

Discussion/Explanation:

Less Than Significant Impact: The main project site and the Ramona replacement parcel are not located in a fault rupture hazard zone identified by the Alquist-Priolo Earthquake Fault Zoning Act, Special Publication 42, Revised 1997, Fault-Rupture Hazards Zones in California, or located within any other

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area with substantial evidence of a known fault. Therefore, there will be no impact from the exposure of people or structures to adverse effects from a known fault-rupture hazard zone as a result of this project on these sites.

The Julian replacement parcel is located within a fault-rupture hazard zone as identified by the Alquist-Priolo Earthquake Fault Zoning Act, Special Publication 42 (SP 42), Revised 1997, Fault-Rupture Hazards Zones in California or within an area with substantial evidence of a known fault. However, the only structure that is proposed on the Julian replacement parcel is a sand barn that will be used to store sand and ash and will not have any human habitation.

To ensure the structural integrity of the sand barn, the proposed project must conform to the Seismic Requirements as outlined within the California Building Code. The County Code requires a soils compaction report with proposed foundation recommendations to be approved before the issuance of a building permit. Therefore compliance with the California Building Code and the County Code ensures the proposed project will not result in a potentially significant impact from the exposure of people or structures to potential adverse effects from known fault-rupture hazard zone as a result of this project.

- ii. Strong seismic ground shaking?
- Potentially Significant Impact Less than Significant Impact |X|Less Than Significant With Mitigation No Impact Incorporated

Discussion/Explanation:

Less Than Significant Impact: As discussed in Section V.a.i above, 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 requires a soils compaction report with proposed foundation recommendations to be approved before the issuance of a building permit. Therefore, compliance with the California Building Code and the County Code ensures the project will not result in a potentially significant impact from the exposure of people or structures to potential adverse effects from strong seismic ground shaking.

iii. Seismic-related ground failure, including liquefaction?

Potentially Significant Impact	\square	Less than Significant Impact
Less Than Significant With Mitigation Incorporated		No Impact

Discussion/Explanation:

Less Than Significant Impact: The project site is located within a "Potential Liquefaction Area" as identified in the County Guidelines for Determining

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Significance for Geologic Hazards. However, during CEQA review and analysis of the Ramona Library project, it was determined that the project on-site conditions do not have susceptibility to settlement and liquefaction. Therefore, there is a low potential to expose people or structures to adverse effects from ground failure, including liquefaction.

iv. Landslides?

Potentially Significant Impact	\boxtimes	Less than Significant Impact
Less Than Significant With Mitigation Incorporated		No Impact

Discussion/Explanation:

Less Than Significant Impact: The main project site and the replacement parcels area not within a "Landslide Susceptibility Area" as identified in the County Guidelines for Determining Significance for Geologic Hazards. Landslide Susceptibility Areas were developed based on landslide risk profiles included in the Multi-Jurisdictional Hazard Mitigation Plan, San Diego, CA (URS, 2004). Landslide risk areas from this plan were based on data including steep slopes (greater than 25%); soil series data (SANDAG based on USGS 1970s series); soil-slip susceptibility from USGS; and Landslide Hazard Zone Maps (limited to western portion of the County) developed by the California Department of Conservation, Division of Mines and Geology (DMG). Also included within Landslide Susceptibility Areas are gabbroic soils on slopes steeper than 15% in grade because these soils are slide prone. Since the project is not located within an identified Landslide Susceptibility Area and the geologic environment has a low probability to become unstable, the project would have a less than significant impact from the exposure of people or structures to potential adverse effects from landslides.

- b) Result in substantial soil erosion or the loss of topsoil?
- Potentially Significant Impact

Less than Significant Impact

Less Than Significant With Mitigation
Incorporated No Impact

Discussion/Explanation:

Less Than Significant Impact: According to the Soil Survey Geographic (SSURGO) database for San Diego County dated May 2011, the soils on the southern parcels of the main project site are identified as a Placentia sandy loam and the soils on the northern parcels are identified as Vasalia sandy loam. The southern parcels (approximately half) of the main project site have slopes of 2 to 9 percent (PeC) and have a soil erodibility rating of "slight" as indicated by the Soil Survey for the San Diego Area, prepared by the US Department of Agriculture, Soil Conservation and Forest Service dated December 1973. The northern parcels of

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the main project site (APN #28118217 and APN #28118218) are identified as a mixture of Placentia sandy loam at slopes of 2 to 9 percent and vasalia sandy loam at slopes of 0 to 2 percent (PeC) and have a soil erodibility rating of "slight" as indicated by the Soil Survey. The area of APN #28118218 along the Santa Maria Creek has soils identified as riverwash that is cobbly and is excessively drained and permeable.

While the proposed project's construction will result in site disturbance and grading, the project is 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).

In addition, the proposed project will implement Site Design Best Management Practice (BMPs) that reduce erosion, to the maximum extent practicable. The BMPs include utilizing landscaping of the slopes and common areas with drought-tolerant plant species that are planted expeditiously to reduce erosion.

Furthermore, with the implementation of a Storm Water Management Plan (see Section IX, Hydrology and Water Quality) a number of BMPs will be implemented that will prevent the erosion process from occurring. Due to these factors, the proposed project appears to not result in significantly increased erosion potential. However, the proposed project boundary intersects the 100-year floodway and the 100-year Floodplain as identified in Federal Emergency Management Agency (FEMA) Flood Insurance Rate Maps and the project is proposing to place structures within the boundaries of the 100-year floodplain (or flood fringe), namely the proposed childcare center. The placement of a structure within the 100-year floodplain represents the potential to redirect flood flows in this area and may cause substantial soil erosion. This is considered to be potentially significant impact of the project. In order to reduce this impact to less than significant, the proposed project design shall locate the childcare center outside of the 100-year floodplain. Without structures located in the floodplain, the project would not contribute to a potentially significant impact on soil erosion and no impact will be identified.

In addition, with location of the childcare center outside the 100-year floodplain, the project will not contribute to a cumulatively considerable impact because all the of past, present and future projects included on the list of projects that involve grading or land disturbance are required to follow the requirements of the San Diego County Code of Regulations, Title 8, Zoning and Land Use Regulations, Division 7, Sections 87.414 (DRAINAGE - EROSION PREVENTION) and 87.417 (PLANTING); Order 2001-01 (NPDES No. CAS 0108758), adopted by the San Diego Region RWQCB on February 21, 2001; County Watershed Protection, Storm Water Management, and Discharge Control Ordinance (WPO) (Ord. No. 9424); and County Storm water Standards Manual adopted on February 20, 2002, and amended January 10, 2003 (Ordinance No. 9426). Refer to XVIII. Mandatory Findings of Significance for a comprehensive list of the projects considered.

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c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in an on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?

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Potentially Significant Impact	\square	Less than Significant Impact
Less Than Significant With Mitigation		No Impact

Less Than Significant With Mitigation	No Impact	
Incorporated	No impact	

Discussion/Explanation:

Less Than Significant Impact: The proposed project involves grading that would result in the creation of areas of cut and areas underlain by fill. In order to assure that any proposed buildings (including those proposed on the main project site) are adequately supported (whether on native soils, cut or fill), a Soils Engineering Report is required as part of the Building Permit process. This Report would evaluate the strength of underlying soils and make recommendations on the design of building foundation systems. The Soils Engineering Report must demonstrate that a proposed building meets the structural stability standards required by the California Building Code. The report must be approved by the County prior to the issuance of a Building Permit. With this standard requirement, impacts would be less than significant. For further information regarding landslides, liquefaction, and lateral spreading, refer to VI Geology and Soils, Question a., iii-iv listed above.

- d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?
 - Potentially Significant Impact Less than Significant Impact Less Than Significant With Mitigation \mathbf{X} No Impact

Incorporated

Discussion/Explanation:

No Impact: The project 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 PeC sandy loam 2 to 9 percent, PeC placentia sandy loam 2 to 9 percent, and PeC vasalia sandy loam 0 to 2 percent. These soils have a shrink-swell behavior of low and represent no substantial risks to life or property. Therefore, the project will 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.

- e) Have 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?
- Potentially Significant Impact Less than Significant Impact Less Than Significant With Mitigation \square No Impact Incorporated

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Discussion/Explanation:

No Impact: The project will rely on public water and sewer for the disposal of wastewater. A service availability letter dated September 22, 2015 has been received from the Ramona Municipal Water District indicating that the facility has adequate capacity for the proposed project's wastewater disposal needs with the adherence to certain conditions. A site specific project level sewer analysis shall be prepared with final design of the RICC to ensure to that the Ramona Municipal Water District continues to have capacity for this project. No septic tanks or alternative wastewater disposal systems are proposed.

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VII. GREENHOUSE GAS EMISSIONS – Would the project

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Potentially Significant Impact	\square	Less than Significant Impact
Less Than Significant With Mitigation Incorporated		No Impact

Discussion/Explanation:

Less Than Significant Impact:

Greenhouse Gas (GHG) Emissions are said to result in an increase in the earth's average surface temperature commonly referred to as global warming. This rise in global temperature is associated with long-term changes in precipitation, temperature, wind patterns, and other elements of the earth's climate system, known as climate change. These changes are now broadly attributed to GHG emissions, particularly those emissions that result from the human production and use of fossil fuels.

GHGs include carbon dioxide, methane, halocarbons (HFCs), and nitrous oxide, among others. Human induced GHG emissions are a result of energy production and consumption, and personal vehicle use, among other sources. A regional GHG inventory prepared for the San Diego Region¹ identified on-road transportation (cars and trucks) as the largest contributor of GHG emissions in the region, accounting for 46% of the total regional emissions. Electricity and natural gas combustion were the second (25%) and third (9%) largest regional contributors, respectively, to regional GHG emissions.

Climate changes resulting from GHG emissions could produce an array of adverse environmental impacts including water supply shortages, severe drought, increased flooding, sea level rise, air pollution from increased formation of ground level ozone

¹ San Diego County Greenhouse Gas Inventory: An Analysis of Regional Emissions and Strategies to Achieve AB 32 Targets. University of San Diego and the Energy Policy Initiatives Center (EPIC), September 2008.

and particulate matter, ecosystem changes, increased wildfire risk, agricultural impacts, ocean and terrestrial species impacts, among other adverse effects.

In 2006, the State passed the Global Warming Solutions Act of 2006, commonly referred to as AB 32, which set the greenhouse gas emissions reduction goal for the State of California into law. The law requires that by 2020, State emissions must be reduced to 1990 levels by reducing greenhouse gas emissions from significant sources via regulation, market mechanisms, and other actions.

According to the San Diego County Greenhouse Gas Inventory (2008), the region must reduce its GHG emissions by 33 percent from "business-as-usual" emissions to achieve 1990 emissions levels by the year 2020. "Business-as-usual" refers to the 2020 emissions that would have occurred in the absence of the mandated reductions.

Senate Bill 375 (SB 375), passed in 2008, links transportation and land use planning with global warming. It requires the California Air Resources Board (ARB) to set regional targets for the purpose of reducing greenhouse gas 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. SANDAG has prepared a Sustainable Communities Strategy (SCS) which is a new element of the 2050 Regional Transportation Plan (RTP). The strategy identifies how regional greenhouse gas reduction targets, as established by the ARB, will be achieved through development patterns, transportation infrastructure investments, and/or transportation measures or policies that are determined to be feasible. The County of San Diego has also adopted Climate Change policies in the General Plan.

In addressing the potential for a project to generate GHG emissions that would have a potentially significant cumulative effect on the environment, a 900 metric ton threshold was selected to identify those projects that would be required to calculate emissions and implement mitigation measures to reduce a potentially significant impact. The 900 metric ton screening threshold is based on a threshold included in the CAPCOA white paper that covers methods for addressing greenhouse gas emissions under CEQA. The CAPCOA white paper references the 900 metric ton guideline as a conservative threshold for requiring further analysis and mitigation. The 900 metric ton threshold was based on a review of data from four diverse cities (Los Angeles in southern California and Pleasanton, Dublin, and Livermore in northern California) to identify the threshold that would capture at least 90% of the residential units or office space on the pending applications list. This threshold will require a substantial portion of future development to minimize GHG emissions to ensure implementation of AB 32 targets is not impeded. By ensuring that projects that generate more than 900 metric tons of GHG implement mitigation measures to reduce emissions, it is expected that a majority of future development will contribute to emission reduction goals that will assist the region in meeting its GHG reduction targets.

It should be noted that an individual project's GHG emissions will generally not result in direct impacts under CEQA, as the climate change issue is global in nature, however an individual project could be found to contribute to a potentially significant

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cumulative impact. CEQA Guidelines Section 15130(f) states that an EIR shall analyze greenhouse gas emissions resulting from a proposed project when the incremental contribution of those emissions may be cumulatively considerable.

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The County follows the recommendations of CAPCOA (CAPCOA 2008), which utilizes a screening threshold of 900 metric tons of CO2e to determine if further analysis is required. In the event that a project's GHG emissions exceed 900 metric tons of CO2e, the County requires an evaluation of the project's GHG reductions based on the ARB's 2011 Scoping Plan. As discussed in Section 3.0, the significance thresholds are based on a Threshold of 16% below "unmitigated" levels. If the project can demonstrate that it meets this threshold, it is considered to demonstrate that a project would not generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment. Also, provided the project is consistent with applicable plans, programs, and regulations, the project would be consistent with the goals of AB 32.

A Global Climate Change Assessment, dated September 22, 2015, completed by Valorie Thompson of Scientific Resources Associated, was prepared for the proposed project (attached as Appendix D). The Assessment concluded that emissions of GHGs would result in a net increase in emissions from the proposed project construction and operations. The Assessment included a GHG inventory for emissions with implementation of GHG reduction measures and reductions due to specific project design features. The inventory assumed the following regulatory measures would be implemented:

- Pavley I Standards 14.15% reduction for light-duty vehicles.
- Low Carbon Fuel Standard 10% reduction in emissions from vehicles
- Advanced Clean Cars 3% reduction in emissions from passenger vehicles by 2020
- Renewable Portfolio Standard 33% renewables

In addition, the inventory assumed the following project design features would be implemented:

- The installation of low-flow fixtures would reduce water use from "unmitigated" levels.
- The buildings would be constructed as a "Zero net energy" building, therefore the project would generate no GHG emissions from the use of electricity or natural gas in the building.
- Solid waste would be reduced following the solid waste diversion goal of 75% established in California by AB 341.
- GHG emissions were reduced by 20% for solid waste handling based on standard County assumptions.
- The project will encourage recycling at the commercial uses.

The Assessment concluded that with the implementation of these project design features designed to reduce GHGs below "business as usual" levels, the

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proposed Project will meet the significance threshold by reducing operational GHG emissions by 21.3%. Because the project would reduce emissions by more than 16% as required by the County, the Project would meet the County's threshold of 16% below business as usual. Therefore, the Project will not generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.

- b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?
- Potentially Significant Impact
 Less Than Significant With Mitigation Incorporated
 Incorporated
 Less than Significant Impact
 No Impact

Discussion/Explanation:

Less than Significant Impact: In 2006, the State passed the Global Warming Solutions Act of 2006, commonly referred to as AB 32, which set the greenhouse gas emissions reduction goal for the State of California into law. The law requires that by 2020, State emissions must be reduced to 1990 levels by reducing greenhouse gas emissions from significant sources via regulation, market mechanisms, and other actions.

Senate Bill 375 (SB 375), passed in 2008, links transportation and land use planning with global warming. It requires the California Air Resources Board (ARB) to set regional targets for the purpose of reducing greenhouse gas 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. SANDAG has prepared a Sustainable Communities Strategy (SCS) which is a new element of the 2050 Regional Transportation Plan (RTP). The strategy identifies how regional greenhouse gas reduction targets, as established by the ARB, will be achieved through development patterns, transportation infrastructure investments, and/or transportation measures or policies that are determined to be feasible.

To implement State mandates to address climate change in local land use planning, local land use jurisdictions are generally preparing GHG emission inventories and reduction plans and incorporating climate change policies into local General Plans to ensure development is guided by a land use plan that reduces GHG emissions. The County of San Diego has incorporated climate change policies into its General Plan. These policies provide direction for individual development projects to reduce GHG emissions and help the County meet its GHG emission reduction targets.

The proposed Project will be consistent with the County's General Plan policies that are designed to reduce GHG emissions including:

• Policy COS-14.1 (Land Use Development)

- Policy COS-14.2 (Villages and Rural Villages)
- Policy COS-14.3 (Sustainable Development)
- COS-15.4 (Title 24 Energy Standards)
- COS-19.1 (Sustainable Water Supply Sustainable Development Practices)

In addition, to the extent required by law, the proposed Project will comply with all applicable regulations adopted by the ARB and other regulatory agencies to implement the Scoping Plan pursuant to AB 32.

The propose project will purchase power from San Diego Gas and Electric, which is developing its renewable portfolio standard in accordance with the state mandates in Executive Order S-21-09.

The proposed project will achieve a net zero energy status in the building. The project would be net zero on an annual basis. Further, vehicles operating within the proposed project will meet Pavley and Low Carbon Fuel Standard Program to the extent required by law.

Therefore, the proposed project would not conflict with any applicable plans, policies, and regulations adopted for the purpose of reducing the emissions of greenhouse gases, would be consistent with the goals of AB 32 and the County's requirements, and would not result in a significant impact on global climate change.

VIII. HAZARDS AND HAZARDOUS MATERIALS -- Would the project:

- a) Create a significant hazard to the public or the environment through the routine transport, storage, use, or disposal of hazardous materials or wastes or through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?
 - Potentially Significant Impact Less than Significant Impact Less Than Significant With Mitigation No Impact
 - Incorporated

Discussion/Explanation:

No Impact: The project will not create a significant hazard to the public or the environment because it does not propose the storage, use, transport, emission, or disposal of Hazardous Substances, nor are Hazardous Substances proposed or currently in use in the immediate vicinity. In addition, the project does not propose to demolish any existing structures onsite and therefore would not create a hazard related to the release of asbestos, lead based paint or other hazardous materials from demolition activities.

b) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

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Potentially Significant Impact	Less tha	an Significant Impact

_	, , , , , , , , , , , , , , , , , , , ,			0	
	Less Than Significant With Mitigation Incorporated	\square	No Impact		

Discussion/Explanation:

No Impact: The project is not located within one-quarter mile of an existing or proposed school. Therefore, the project will not have any effect on an existing or proposed school.

c) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, or is otherwise known to have been subject to a release of hazardous substances and, as a result, would it create a significant hazard to the public or the environment?

	Potentially Significant Impact	Less than Significant Impact
\boxtimes	Less Than Significant With Mitigation Incorporated	No Impact

Discussion/Explanation:

Less than Significant Impact with Mitigation Incorporated:

Main Project Site

Based on a Hazards Assessment conducted by Kristina Leybe, a Dudek hydrogeologist on August 19, 2015 (attached as Appendix E), a total of 37 sites, within the American Society for Testing Materials-specified search distances of the main project site, were listed in regulatory agency databases. Information reviewed did not indicate that the main project site has been impacted by contamination from any of the nearby sites, except for one adjacent site. The adjacent site, Ramona Texaco at 1210 Main Street, is located to the southwest across Main Street from the main project site. A release of gasoline to soil was reported in October 1998. This site is currently undergoing active remediation, and groundwater sampling occurs on a semi-annual basis.

Recent (May 2015) concentration plume maps show that benzene and methyl tertbutyl-ether plumes extend onto the main project site. Benzene concentrations for the past two years, in wells nearest the project site, ranged between 130 μ g/L and 4,400 μ g/L, greater than the Environmental Protection Agency's (EPA) maximum contaminated level (MCL) of 5 μ g/L.

The Department of Environmental Health (DEH) stated, in a letter dated July18, 2015, that the Ramona Texaco should complete a health risk assessment to evaluate potential impacts to any proposed buildings constructed on the Caltrans site. The DEH recently (July 8, 2015) approved a soil vapor survey for the Ramona Texaco site, which includes sampling at the main project site. According to a letter from the DEH dated March 13, 2015, if the results of the survey show a significant impact to the project site, the DEH will require the Ramona Texaco to mitigate the

risk. If there is a vapor intrusion risk, mitigation measures should be implemented at the main project site. These could include vapor barriers beneath the proposed buildings, passive venting, and/or ongoing monitoring.

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MM-HAZ-1 The County shall not commence grading the main project site until the vapor survey for the Ramona Texaco at 1210 Main Street is completed, and a determination is made as to the risk to worker's health and safety. Once the health risk assessment is complete, the County shall follow the recommendations outline in the DEH letter dated March 13, 2005, which include: 1) remove the sea cargo container on APN 281-191-03 and 2) upon redevelopment, enter the Voluntary Assistance Program for oversight of management of petroleum-impacted soil.

One of the Caltrans parcels on the southeastern portion of the main project site (APN #281-191-02) is listed in the HIST CORTESE, LUST, SWEEPS UST, San Diego Co. HMMD, and San Diego Co. SAM databases. This listing is for the Ramona Maintenance Station that is owned by Caltrans. 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 EPA MCLs of 5 μ g/L and 1 μ g/L, respectively.

A variety of hazardous substances and wastes would be stored, used, and generated on the main project site during construction of the RICC Project. These substances and wastes 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, the following mitigation measures have been included to ensure accidents would be prevented and contained.

- **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.

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.

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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.

Based on the review of aerial photographs, the central portion of main project site may have been used for agriculture from at least 1939 to 1979. Since portions of the project site may have historically been used for agricultural purposes, residual pesticides may be present in shallow soils associated with the former agricultural uses.

MM-HAZ-6 Prior to excavation or construction activities, the County shall conduct soil sampling in order to assess potential human health and environmental risk.

Therefore, although the main project site is listed in the HIST CORTESE, LUST, SWEEPS UST, San Diego Co. HMMD, and San Diego Co. SAM databases DEH SAM listing and/or CalSites Envirostor database, with mitigation incorporated, the project will not create a significant hazard to the public or the environment and impacts are less than significant.

Ramona Replacement Parcel

The Ramona replacement parcel was not listed in GeoTracker or EnviroStor. Two surrounding sites within 400 feet of the Ramona replacement parcel were identified in the GeoTracker databases. The first site was the Ramona Oil Co. Inc. at 1000 Olive Street that borders the Ramona replacement parcel to the east. This site is listed in the following databases: Cleanup Program Site, San Diego Co. HMMD, SLIC, LUST, SWEEPS UST, and HIST CORTESE. Information about this site was obtained from the EDR radius search report that was commissioned for the main project site. A release of gasoline to groundwater was reported on November 20, 1998. According to the Case Closure Summary letter dated July 13, 2010, the depth to water was between 10.44 and 17.73 feet below ground surface, and groundwater flow was to the southwest. Residual MTBE concentrations in the groundwater at one of the three well onsite is above the MCL. On July 13, 2010 the site received case closure by the San Diego County Local Oversight Program agency.
The second site was the Ramona Transit Mix at 940 Olive Street. This site is located approximately 400 feet east of the Ramona replacement parcel. This site is listed in the San Diego Co. HMMD database. Information about this site was obtained from the EDR radius search report that was commissioned for the RICC project site. On March 22, 1999, a release of diesel fuel to soil was reported. The site received case closure on July 25, 2002 by the LOP agency.

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Therefore, while there are two sites listed in the Geotracker databases, the proposed project will not create a significant hazard to the public or the environmental and impacts are less than significant.

Julian Replacement Parcel

The Julian replacement parcel was not listed in GeoTracker or EnviroStor. Two surrounding sites within 400 feet of the Julian replacement parcel were identified in the Geotracker databases. The first site is the Julian Road Station at 1524 Highway 78, which is located adjacent to the replacement parcel to the west. This site is listed in the LUST Cleanup Site database. A release of gasoline to groundwater was reported On November 5, 1996. Three gasoline underground storage tanks (two - 1,000-gallon and one 10,000 gallon) were removed from the site. Based on the Case Closure Summary letter dated May 19, 2011, groundwater flow was to the north and northeast, and depth to water was 26.85 feet. The nearest onsite well to the replacement parcel is approximately 260 feet northwest of the replacement parcel. Benzene concentrations at this well have been below the MCL since at least 2004. On May 19, 2011 the site received case closure.

The second site is the CDF Julian Forest Fire Station at 1587 Highway 78, which is located approximately 350 west feet west of the replacement parcel. On March 31, 1997, a release of gasoline to soil was reported. A soil vapor survey was conducted in August 2002. A health risk evaluation was conducted. Results of the health risk evaluation showed less than one in one million cancer risk. The site received case closure on December 4, 2009. One neighboring site to the east of the Ramona replacement parcel may have impacted the subsurface conditions of the exchange parcel.

Therefore, while there are two sites listed in the Geotracker databases, the project will not create a significant hazard to the public or the environmental and impacts are less than significant.

d) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

Potentially Significant Impact

Less than Significant Impact

Less Than Significant With Mitigation

No Impact

Discussion/Explanation:

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Less Than Significant Impact:

The main project site is located within two miles of the Ramona Airport, and falls within the Review Area 2 of the Ramona Airport Land Use Compatibility Plan. Table 6 presents the requirements for projects that fall within Review Area 2.

Table 6 Project Consistency with Ramona Airport Land Use Compatibility Plan

Requirements/Compatibility	Project Consistency
Any proposed object in a High Terrain Zone have a height of more than 35 feet, as indicated on the Compatibility Policy map: Airspace Protection included in Chapter 2 of the Airport Land Use Compatibility Plan.	The proposed project proposes several one-to-two story buildings that will not exceed the 35 feet building limit. Therefore, the project is consistent with this compatibility measure.
Any project having the potential to create electrical or visual hazards to aircraft in flight, including: electrical interference with radio communications or navigational signals; lighting which could be mistaken for airport lighting; glare or bright light in the eyes of pilots using the airport; and impaired visibility near the airport.	The proposed project does not propose any radio, navigational, bright lighting or visual hazards that may impair a pilot's vision. Additionally, the project proposes to comply with the County of San Diego lighting ordinance. Therefore, the project complies with this compatibility measure.
The project does not propose construction of any structure equal to or greater than 150 feet in height, constituting a safety hazard to aircraft and/'or operations from an airport or heliport.	The project proposes the construction of community center buildings which do not include any structures that would exceed 150 feet in height. Therefore, the project complies with this compatibility measure.
The project does not propose any artificial bird attractor, including but not limited to reservoirs, golf courses with water hazards, large detention and retention basins, wetlands, landscaping with water features, wildlife refuges, or agriculture (especially cereal grains).	The project proposes the construction of community center buildings and community recreation areas. Landscaping is proposed, however, it will not contain any features which would unusually attract bird species that could be a nuisance to flight operations. Therefore, the project complies with this compatibility measure.
The proposed project is located within the FAA Height Notification Surface due to its proximity to Ramona Airport, which requires that notice be filed with the FAA. The applicant has completed FAA Form 7460-1 Notice of Proposed Construction or Alteration and submitted the form to the FAA for review. The FAA has not identified the project to be an airspace obstruction or hazard, therefore, the project complies with the Federal Aviation Administration Regulations, Part 77 – Objects Affecting Navigable Airspace.	The project is located within Review area 2 of the Ramona Airport. The county will submit a completed FAA Form 7460-1 Notice of Proposed Construction or Alteration form to the FAA for review and comment.

Therefore, the project will not constitute a safety hazard for people residing or working in the project area.

- e) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?
- Potentially Significant Impact

Less than Significant Impact

- Less Than Significant With Mitigation
 - Incorporated

 \square No Impact

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Discussion/Explanation:

No Impact: The proposed project is not within one mile of a private airstrip. As a result, the project will not constitute a safety hazard for people residing or working in the project area.

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f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Potentially Significant Impact	\square	Less than Significant Impact
Less Than Significant With Mitigation Incorporated		No Impact

Discussion/Explanation:

The following sections summarize the project's consistency with applicable emergency response plans or emergency evacuation plans.

i. Operational Area Emergency Plan and Multi-Jurisdictional Hazard Mitigation Plan:

Less Than Significant Impact: The Operational Area Emergency Plan 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. 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. The proposed project will not interfere with this plan because it will not prohibit subsequent plans from being established or prevent the goals and objectives of existing plans from being carried out.

ii. San Diego County Nuclear Power Station Emergency Response Plan

No Impact: The San Diego County Nuclear Power Station Emergency Response Plan will not be interfered with by the proposed project due to the location of the project, plant and the specific requirements of the plan. The emergency plan for the San Onofre Nuclear Generating Station includes an emergency planning zone within a 10-mile radius. All land area within 10 miles of the plant is not within the jurisdiction of the unincorporated County and as such a project in the unincorporated area is not expected to interfere with any response or evacuation.

iii. Oil Spill Contingency Element

No Impact: The Oil Spill Contingency Element will not be interfered with because the proposed project is not located along the coastal zone or coastline.

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iv. Emergency Water Contingencies Annex and Energy Shortage Response Plan

No Impact: The Emergency Water Contingencies Annex and Energy Shortage Response Plan will not be interfered with because the proposed project does not propose altering major water or energy supply infrastructure, such as the California Aqueduct.

v. Dam Evacuation Plan

No Impact: The Dam Evacuation Plan will not be interfered with because the proposed project is not located within a dam inundation zone. The nearest reservoir located near the main project site is Sutherland Dam, and the inundation area for this dam is located north of the main project site. Therefore, no impacts are identified for this issue area.

- g) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?
 - Potentially Significant Impact 🛛 Less than Significant Impact
 - Less Than Significant With Mitigation Discussion No Impact

Discussion/Explanation:

Less Than Significant Impact:

The proposed project is located in the community of Ramona. Previous fires have burned areas within three miles north of the main project site. The main project site is located in the center of the Ramona Village Center, thus lowering the potential to wildland fires. The project will not expose people or structures to a significant risk of loss, injury or death involving wildland fires because the project will 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, as adopted and amended by the local fire protection district. Implementation of these fire safety standards will occur during the Tentative Map, Tentative Parcel Map, or building permit process.

A Fire Service Availability Letter and conditions, dated August 22, 2015, has been received from the Ramona Fire Department/CalFire (attached in Appendix F). The Fire Service Availability Letter indicates the expected emergency travel time to the project site to be adequate. Therefore, through compliance with the Consolidated Fire Code, the project is not anticipated to expose people or structures to a significant risk of loss, injury or death involving hazardous wildland fires. Moreover, the project will not contribute to a cumulatively considerable impact, because all

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past, present and future projects in the surrounding area are required to comply with the Consolidated Fire Code.

h) Propose a use, or place residents adjacent to an existing or reasonably foreseeable use that would substantially increase current or future resident's exposure to vectors, including mosquitoes, rats or flies, which are capable of transmitting significant public health diseases or nuisances?

Potentially Significant Impact		Less than Significant Impact
Less Than Significant With Mitigation Incorporated	\square	No Impact

Discussion/Explanation:

No Impact: The project does not involve or support uses that allow water to stand for a period of 72 hours (3 days) or more (e.g. artificial lakes, agricultural irrigation ponds). Also, the project does not involve or support uses that will produce or collect animal waste, such as equestrian facilities, agricultural operations (chicken coops, dairies etc.), solid waste facility or other similar uses. Moreover, there are none of these uses on adjacent properties. Therefore, the project will not substantially increase current or future resident's exposure to vectors, including mosquitoes, rats or flies.

IX. HYDROLOGY AND WATER QUALITY -- Would the project:

a) Violate any waste discharge requirements?

Potentially Significant Impact	\boxtimes	Less than Significant Impact
Less Than Significant With Mitigation Incorporated		No Impact

Discussion/Explanation:

Less Than Significant Impact: According to a Hydrology and Water Quality Review for the proposed project, dated August 2015, by Dylan Duverge, a Dudek hydrogeologist (attached as Appendix G), the project proposal requires a National Pollutant Discharge Elimination System (NPDES) permit for discharge of storm water associated with grading and construction activities. To reduce potential pollutants to the maximum extent practicable from entering storm water runoff, the proposed project will be required to implement the following site design, source control, and/or treatment control Best Management Practices (BMPs):

Site Design BMPs: Landscaping of the slopes and common areas are incorporated into the plans. The landscaping will consist of both drought-tolerant plant species. 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

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water. Also, riprap will be placed at storm drain outfalls to reduce velocities.

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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.

These BMPs will enable the proposed project to 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).

Thus, the proposed project's conformance to the waste discharge requirements listed above ensures the project will not create cumulatively considerable water quality impacts related to waste discharge because, through the permit, the project will conform to Countywide watershed standards in the JURMP and SUSMP, derived from State regulation to address human health and water quality concerns. Therefore, the proposed project will not contribute to a cumulatively considerable impact to water quality from waste discharges.

b) Is the project tributary to an already impaired water body, as listed on the Clean Water Act Section 303(d) list? If so, could the project result in an increase in any pollutant for which the water body is already impaired?

	Potentially Significant Impact	Less than Significant Impact
_	Less Than Significant With Mitigation	

Less Than Significant With Mitigation
No Impact
Incorporated

Discussion/Explanation:

Less Than Significant Impact with Mitigation Incorporated: The project lies in the Ramona Hydrologic Subarea of the Santa Maria Valley Hydrologic Area of the

San Dieguito Hydrologic Unit. According to the Clean Water Act Section 303(d) list, dated 2010, the primary water quality problems currently affecting the Santa Maria Valley Hydrologic Area specifically include total dissolved solids and bacteria/pathogens. The primary source of these pollutants in the watershed is from agricultural and equestrian land uses (e.g., manure). The San Dieguito River and Lake Hodges have Clean Water Act Section 303(d) impairments for a number of pollutants, including pathogens, total dissolved solids, nutrients, metals, and toxicity.

The proposed project is not expected to generate significant amounts of non-visible pollutants and does not include industrial activity or other significant pollutant generating activity. However, based on review of proposed uses, the following constituents of concern may be generated in limited quantities on the project site and hence could affect water quality if entrained in stormwater runoff:

- Sediment discharge due to construction activities
- Nutrients and/or pesticides associated landscaping or pre-existing uses (agriculture)
- Bacteria and viruses associated with food waste (e.g., uncovered trash bins and/or outdoor dining areas)
- Trash and debris
- Oil, hydrocarbons and motor fluids from driveways and parking areas

Potential project pollutants of concern are further detailed in Table 7.

Pollutant Category	Anticipated	Potential	Potential Source	Closest Surface Water Impairment (Distance Downstream)
Sediments		Х	Landscaping	None
Nutrients		Х	Landscaping	San Dieguito River (10 miles)
Organic compounds		Х	Uncovered parking	None
Trash and debris	Х		Waste bins, outdoor activity areas	None
Oxygen demanding Substances		Х	Solvents	None
Oil and grease	Х		Uncovered parking	None
Bacteria and viruses		Х	Food waste	San Dieguito River (10 miles)
Pesticides		Х	Landscaping	

Table 7Potential Project Pollutants of Concern

The source of these pollutants from the proposed project would be food waste and trash enclosures or bins. The project's contribution of these pollutants in the context of watershed-wide issues would be negligible. The primary source of these pollutants in the watershed are from agricultural and equestrian land uses (e.g., manure), neither of which are proposed by the project. The San Dieguito River and Lake Hodges have CWA Section 303(d) impairments for a number of pollutants, but these waters are greater than 10 miles from the proposed project site. Given the distance, the small portion of the watershed occupied by the project, and the limited

quantity of pollutants to be generated by the project, it would not contribute substantially to any of these current CWA Section 303(d) impairments.

The project proposes to develop community center facilities on the main project site which disturbs 1 acre or more of soil. Therefore, the proposed project requires a Construction General Permit to avoid and minimize water quality impacts attributable with construction and land disturbance activity. Construction activity subject to this permit includes clearing, grading, and disturbances to the ground, 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. With the implementation of mitigation (MM-WQ-1) impacts associated construction activity will be less than significant.

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.

With the preparation and implementation of a SWPPP, a detailed description of construction BMPs will be developed such as the following:

- Silt Fence
- Fiber Rolls
- Street Sweeping and Vacuuming
- Storm Drain Inlet Protection
- Stockpile Management
- Solid Waste Management
- Stabilized Construction Entrance/Exit
- Dewatering Operations
- Vehicle and Equipment Maintenance areas
- Desiltin Basin
- Gravel Bag Berm
- Sandbag Barrier
- Material Delivery and Storage
- Spill Prevention and Control
- Concrete Waste Management
- Water Conservation Practices
- Paving and Grinding Operations
- Permanent Revegetation of All disturbed uncovered
- Erosion Control Mats and Spray-on Applications

Construction BMPs for the proposed project will be selected, constructed, and maintained so as to comply with all applicable ordinances and guidance documents.

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In addition, the implementation of **MM-WQ-2** will also address the pollutants of concern noted above.

MM-WQ-2 A Major Stormwater Management Plan (SWMP) shall be prepared 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 required SWMP, as described below, would avoid or substantially minimize the levels of these pollutants in stormwater runoff from the site.

The proposed BMPs are consistent with regional surface water and storm water planning and permitting process that has been established to improve the overall water quality in County watersheds. As a result the proposed project will not contribute to a cumulative impact to an already impaired water body, as listed on the Clean Water Act Section 303(d). Regional surface water and storm water permitting regulation for County of San Diego includes the following: San Diego Region, Order No. R9-2007-0001, (NPDES No. CAS 0108758); County Watershed Protection Ordinance; Stormwater Management, and Discharge Control Ordinance (WPO); County Stormwater Standards Manual. The stated purposes of these ordinances are to protect the health, safety and general welfare of the County of San Diego residents; to protect water resources and to improve water quality; to cause the use of management practices by the County and its citizens that will reduce the adverse effects of polluted runoff discharges on waters of the state; to secure benefits from the use of storm water as a resource; and to ensure the County is compliant with applicable state and federal laws. The Watershed Protection Ordinance has discharge prohibitions, and requirements that vary depending on type of land use activity and location in the County. Each project subject to WPO is required to

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prepare a Stormwater Management Plan that details a project's pollutant discharge contribution to a given watershed and propose BMPs or design measures to mitigate any impacts that may occur in the watershed.

c) Could the proposed project cause or contribute to an exceedance of applicable surface or groundwater receiving water quality objectives or degradation of beneficial uses?

Potentially Significant Impact	\boxtimes	Less than Significant Impact
Less Than Significant With Mitigation Incorporated		No Impact

Discussion/Explanation:

Less Than Significant Impact: The project lies in the Ramona Hydrologic Subarea of the Santa Maria Valley Hydrologic Area of the San Dieguito Hydrologic Unit that has the following existing and potential beneficial uses for inland surface waters, coastal waters, reservoirs and lakes, and ground water: 1) municipal and domestic supply; 2) agricultural supply; 3) industrial process supply, industrial service supply; 4) contact water recreation; 5) non-contact water recreation; 6) warm freshwater habitat; 7) cold freshwater habitat; 8) wildlife habitat; 9) estuarine habitat; 10) marine habitat; 11) preservation of biological habitats of special significance; 12) migration of aquatic organisms; and, 13) rare, threatened, or endangered species habitat.

The project proposes the following potential sources of polluted runoff:

- Sediment discharge due to construction activities
- Nutrients and/or pesticides associated landscaping or pre-existing uses (agriculture)
- Bacteria and viruses associated with food waste (e.g., uncovered trash bins and/or outdoor dining areas)
- Trash and debris
- Oil, hydrocarbons and motor fluids from driveways and parking areas

However, site design measures, source control BMPs, and treatment control BMPs will be employed to reduce potential pollutants in runoff to the maximum extent practicable, such that the proposed project will not cause or contribute to an exceedance of applicable surface or groundwater receiving water quality objectives or degradation of beneficial uses:

In addition, the proposed BMPs are consistent with regional surface water, storm water and groundwater planning and permitting process that has been established to improve the overall water quality in County watersheds. As a result, the proposed project will not contribute to a cumulatively considerable exceedance of applicable surface or groundwater receiving water quality objectives or degradation of beneficial uses. Refer to Section VIII., Hydrology and Water Quality, Question b, for more information on regional surface water and storm water planning and permitting process.

d) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

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Potentially Significant Impact		Less than Significant Impact
Less Than Significant With Mitigation	\square	No Impact
Incorporated	\square	No impaci

Discussion/Explanation:

No Impact: The proposed project will obtain its water supply from the Ramona Water District that obtains water from surface reservoirs or other imported water source. The project will not use any groundwater for any purpose, including irrigation, domestic or commercial demands. In addition, the project does not involve operations that would interfere substantially with groundwater recharge including, but not limited to the following: the project does not involve regional diversion of water to another groundwater basin; or diversion or channelization of a stream course or waterway with impervious layers, such as concrete lining or culverts, for substantial distances (e.g. ¼ mile). These activities and operations can substantially affect rates of groundwater recharge. Therefore, no impact to groundwater resources is anticipated.

e) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

	Potentially Significant Impact	Less than Significant Impact
\ge	Less Than Significant With Mitigation	No Impact

Discussion/Explanation:

Less Than Significant Impact with Mitigation Incorporated: The project proposes the development of community center facilities and recreational amenities. The proposed project will implement the site design BMPs, source control BMPs, and treatment control BMPs outlined in question IX.a above to reduce potential pollutants, including sediment from erosion or siltation, to the maximum extent practicable from entering storm water runoff. These measures will control erosion and sedimentation and satisfy 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).

In addition, with the implementation of SWMP that is required in **MM-WQ-2**, the implementation of all BMPs that will address equipment operation and materials

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management, prevent the erosion process from occurring, and prevent sedimentation in any onsite and downstream drainage swales will be specified and described. The Department of General Services will ensure that the Plan is implemented as proposed. Due to these factors, it has been found that with the incorporation of **MM-WQ-2**, the project will not result in significantly increased erosion or sedimentation potential and will not alter any drainage patterns of the site or area on- or off-site. In addition, because erosion and sedimentation will be controlled within the boundaries of the project, the proposed project will not contribute to a cumulatively considerable impact. For further information on soil erosion refer to VI., Geology and Soils, Question b.

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f) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?



Discussion/Explanation:

Less Than Significant Impact: The Hydrology and Water Quality Review memo determined that the proposed project will not significantly alter established drainage patterns or significantly increase the amount of runoff for the following reasons: The proposed community center on the main project site includes approximately 4.5 acres of impervious surfaces on the site, or 32% of the area within the project boundary. The proposed project would maintain or reduce the current level of imperviousness on the project site, and would not substantially alter drainage patterns of the site or area. Because the site is nearly flat-lying (0.5% slope gradient across the site), would remain so under post-project conditions, and is relatively isolated from surrounding drainage patterns by street curbs on the south, east and west, implementation of the proposed project would not significantly alter existing drainage boundaries and would maintain the prevailing flow patterns. Under both pre- and post-project conditions, stormwater runoff would flow to the north and northwest toward the Santa Maria Creek channel. Minimal changes with respect to site topography and impervious surface coverage mean the project's effects on storm water velocities and peak flow rates will be minimal. Furthermore, the project area's contribution to the Santa Maria Creek watershed is approximately 0.07% of the watershed's total area at the project's discharge location, which means that land cover changes on the project site would have a negligible effect on peak flows within the Santa Maria Creek channel.

Therefore, the project will not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site. Moreover, the proposed project will not contribute to a cumulatively considerable alteration or a drainage pattern or increase in the rate or

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amount of runoff, because the project will not substantially increase water surface elevation or runoff exiting the site, as detailed above.

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- g) Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems?
- Potentially Significant Impact
 Less Than Significant With Mitigation Incorporated
 Less Than Significant With Mitigation
 No Impact

Discussion/Explanation:

Less Than Significant With Mitigation Incorporated: The main project site currently features approximately 5 acres of impervious surface associated with current and remnant concrete pads, an outbuilding, and a Caltrans trailer, comprising approximately 36% of the main project site. Impervious surfaces proposed in the proposed project would include buildings, parking areas, pedestrian walkways, café/plaza, and a skate park, which make up approximately 4.5 acres of impervious surfaces on the site (32% of the area within the project boundary). The proposed project would maintain or reduce the current level of imperviousness on the project site, and would not substantially alter drainage patterns of the site or area. Because the site is nearly flat-lying (0.5% slope gradient across the site), would remain so under post-project conditions, and is relatively isolated from surrounding drainage patterns by street curbs on the south, east and west, implementation of the proposed project would not significantly alter existing drainage boundaries and would maintain the prevailing flow patterns. Under both pre- and post-project conditions, stormwater runoff would flow to the north and northwest toward the Santa Maria Creek channel. Minimal changes with respect to site topography and impervious surface coverage mean the project's effects on storm water velocities and peak flow rates will be minimal. Furthermore, the project area's contribution to the Santa Maria Creek watershed is approximately 0.07% of the watershed's total area at the project's discharge location, which means that land cover changes on the project site would have a negligible effect on peak flows within the Santa Maria Creek channel.

The project would be classified a "Priority Development Project" because it would exceed one acre in size, and therefore must be designed so that runoff rates and durations are controlled to maintain or reduce pre-project downstream erosion conditions and protect stream habitat. Compliance with the RPO, WPO and County standards will 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 covey such flows. This would include adequately sizing stormwater conveyances and including drainage features such as energy dissipation devices at the project's outlet.

MM-HYD-3 Prior to project approval, the County 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.

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Based on this analysis, the impacts of the proposed project would be less than significant with mitigation incorporated.

- h) Provide substantial additional sources of polluted runoff?
 - Potentially Significant Impact
- Less Than Significant With Mitigation

Less than Significant Impact

No Impact

Discussion/Explanation:

Less Than Significant Impact with Mitigation Incorporated: The proposed project is not expected to generate significant amounts of non-visible pollutants and does not include industrial activity or other significant pollutant generating activity. However, based on review of proposed uses, the following constituents of concern may be generated in limited quantities on the project site and hence could affect water quality if entrained in stormwater runoff:

- Sediment discharge due to construction activities
- Nutrients and/or pesticides associated landscaping or pre-existing uses (agriculture)
- Bacteria and viruses associated with food waste (e.g., uncovered trash bins and/or outdoor dining areas)
- Trash and debris
- Oil, hydrocarbons and motor fluids from driveways and parking areas

However, with the implementation of **MM-WQ-1** (discussed above) temporary BMPs will be implemented to address potential construction-related pollutants. In addition, to reduce potential pollutants to the maximum extent practicable from entering storm water runoff, the proposed project will be required to implement the site design BMPs, source control BMPs, and treatment control BMPs outlined in question IX.a above. Refer to IX Hydrology and Water Quality Questions a, b, c, for further information.

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i) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map, including County Floodplain Maps?

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Potentially Significant Impact	\boxtimes	Less than Significant Impact

Less Than Significant With Mitigation	No Impact	-	-

Discussion/Explanation:

Less Than Significant: The proposed project boundary on the main project site intersects the 100-year floodway and the 100-year Floodplain as identified on the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map. However, the project is not proposing to place residential housing within this area and will not place access roads or other improvements which will limit access during flood events or affect downstream properties.

j) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?

Potentially Significant Impact	\boxtimes	Less than Significant Impact
Less Than Significant With Mitigation Incorporated		No Impact

Discussion/Explanation:

Less Than Significant Impact: As discussed in question i above, the proposed project boundary on the main project site intersects the 100-year floodway and the 100-year Flooplain as identified in FEMA Flood Insurance Rate Maps. FEMA-mapped floodways includes the channel of a river/watercourse and adjacent land areas which in an unobstructed condition can discharge a 100 year flood/base flood without any increase in water surface elevations. The area between the floodway boundary and limit of the 100 year floodplain is termed the flood fringe. The flood fringe encompasses the portion of this floodplain that could be completely obstructed without increasing the water surface elevation of a 100 year flood event more than 1 foot at any point. The proposed project includes open space and recreational uses adjacent to Santa Maria Creek and within its associated floodway. These uses would not present substantial impediments to flow so long as proposed improvements do not alter the existing topography and have negligible cross-sectional area (e.g., tree trunks, light poles, etc.). Therefore, the impacts of these uses would be less than significant.

The project is currently proposing to place structures within the boundaries of the 100-year floodplain (or flood fringe), namely the proposed childcare center. The placement of a structure within a 100-year floodplain represents the potential to redirect flood flows in this area, and is considered to be a potentially significant impact of the project. In order to reduce this impact to less than significant, the proposed project will not construct the childcare center outside of the 100-year

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floodplain boundary. Revising the conceptual site plan to place the proposed childcare center outside the boundaries of the 100-year floodplain would be adequate to reduce the potential impact to a less than significant level.

k) Expose people or structures to a significant risk of loss, injury or death involving flooding?

Potentially Significant Impact	\square	Less than Significant Impact
Less Than Significant With Mitigation		No Impact

Discussion/Explanation:

Less Than Significant: As discussed in questions i and h above, the proposed project boundary intersects the 100-year floodway and the 100-year floodplain as identified in FEMA Flood Insurance Rate Maps. The proposed project includes substantial habitable structures within the boundaries of the 100-year floodplain (or flood fringe), namely the proposed childcare center. Although this feature would not increase flood depths within the floodway or alter the lines of inundation for offsite properties, the placement of a habitable structures within a 100-year floodplain represents a potential health and safety risk for its occupants, and is considered to be a potentially significant impact of the project.

The conceptual site plan will be revised to avoid having habitable structures within the 100-year floodplain, and this revision would be adequate to reduce the potential impact to a less than significant level.

I) Expose people or structures to a significant risk of loss, injury or death involving flooding as a result of the failure of a levee or dam?

Potentially Significant Impact		Less than Significant Impact
Less Than Significant With Mitigation Incorporated	\square	No Impact

Discussion/Explanation:

No Impact: The project site lies outside a mapped dam inundation area for a major dam/reservoir within San Diego County. In addition, the project is not located immediately downstream of a minor dam that could potentially flood the property. Therefore, the project will not expose people to a significant risk of loss, injury or death involving flooding.

m)	Inundation	by seiche,	tsunami,	or mudflow?
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- Potentially Significant Impact Less than Significant Impact Less Than Significant With Mitigation \square
- Incorporated

No Impact

Discussion/Explanation:

i. SEICHE

No Impact: The project site is not located along the shoreline of a lake or reservoir; therefore, could not be inundated by a seiche.

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ii. TSUNAMI

No Impact: The project site is located more than a mile from the coast; therefore, in the event of a tsunami, would not be inundated.

iii. MUDFLOW

No Impact: Mudflow is type of landslide. The site is not located within a landslide susceptibility zone. The geologic environment of the project area has a low probability to be located within an area of potential or pre-existing conditions that could become unstable in the event of seismic activity. In addition, though the project does propose land disturbance that will expose unprotected soils, the project is not located downstream from unprotected, exposed soils within a landslide susceptibility zone. Therefore, it is not anticipated that the project will expose people or property to inundation due to a mudflow.

X. LAND USE AND PLANNING -- Would the project:

- a) Physically divide an established community?
 - Potentially Significant Impact
 Less Than Significant With Mitigation
 Incorporated
 Less Than Significant With Mitigation

Discussion/Explanation:

Less Than Significant Impact: The project proposes to introduce new infrastructure in the form of utilities to the area. Curbs, gutters and sidewalks would also be required along 12th Street and 13th Street. However, the proposed project will not significantly disrupt or divide an established community for the following reasons: The main project site is located in the downtown area of Ramona on a primarily vacant site that is adjacent to the Ramona Public Library. Utilities would be required to serve the proposed senior center, the family resource center and the child care facility; however these utilities would be minor utility extensions to connect to the project site to existing infrastructure and will not be located as to disrupt or divide library activities or the commercial and industrial activities of surrounding parcels in downtown Ramona. The utilities would also not preclude the extension of B Street through the project site, as all structures would be placed outside the potential right-of-way for such an extension. Therefore, the infrastructure improvements for the project would be minor utility extensions to connect to the project would be minor utility extensions to connect site to existing infrastructures would be placed outside the potential right-of-way for such an extension. Therefore, the infrastructure improvements for the project would be minor utility extensions to connect to the project would be minor utility extensions to connect to the project site to existing the project site to existing the project would be minor utility extensions to connect to the project site to existing the project would be minor utility extensions to connect to the project site to existing the project would be minor utility extensions to connect to the project site to existing the project would be minor utility extensions to connect to the project site to existing the project would be minor utility extensions to connect to the project site to existing the project would be minor utility extensions to connect

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infrastructure and minor curb, gutter and sidewalk improvements. The project will not significantly disrupt or divide the established community.

b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

	Potentially Significant Impact	Less than Significant Impact
\ge	Less Than Significant With Mitigation	No Impact

Discussion/Explanation:

Main Project Site

Less Than Significant Impact with Mitigation: The main project site is subject to the Regional Land Use Element Policy and General Plan Land Use Designations. The land use map designates the parcels that make up the main project site as Public/Semi-Public Facilities, Rural Commercial or Rural Lands. The southern parcels of the main project site have the Public/Semi-Public Facilities designation, which allows for major facilities to be built and maintained for public use including community service facilities. A portion of the two northern parcels on the main project site is designated rural commercial, which provides for small-scale commercial and civic development that encourages a wide variety of civic uses and community facilities. The proposed community center would be allowable as a civic use, and the project would be consistent with both of these land use designations. 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 project does not propose any structures in this area and with the implementation of MM-BIO-1 a 200-foot wetland buffer would be implemented that preserves the existing natural buffer.

The main 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 main 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 southern parcels are zoned as CD Civic District which provides for community center facilities. The central portion of the main project site is zoned V4 General District, which allows for community recreation and other civic amenities. The northern portions of the main project site are zoned as V2 Rural District and V1 Natural District around the Santa Maria Creek. Both of these zones permit community recreation uses consistent with what is proposed. The proposed project is consistent with both the current zoning and with the policies of the Ramona Community Plan.

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The project elements on the main project site 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 project be consistent with the specific design guidelines for the property.

Ramona Replacement Parcel

Less than Significant Impact: The two replacement parcels are also subject to the Regional Land Use Element and General Plan Land Use Designations. The Ramona replacement parcel has a land use designation of High Impact Industrial, which provides for freestanding industrial development in areas with access to key transportation corridors. Typical uses within this designation include large equipment supply and sales; and other industrial and commercial activities that are generally incompatible with dissimilar adjacent land uses. The project proposes to improve this parcel for Caltrans storage and parking purposes, which is consistent with the current land use designation.

The Ramona replacement parcel is zoned as M54 Industrial in the Ramona Village Center Form Based Code, and the project proposes to improve the parcel with Caltrans parking and storage uses that are consistent with this zone.

Julian Replacement Parcel

Less Than Significant Impact: The Julian replacement parcel has a land use designation of medium impact industrial in the Julian Community Plan, which also provides for freestanding industrial development with access to key transportation corridors. Typical uses within this designation include outdoor operations or require significant outdoor storage. The project proposes to improve this parcel for Caltrans storage and parking purposes including the construction of a 1,600 square foot storage barn, which is consistent with the current land use designation.

The Julian replacement parcel is zoned as M52 Industrial, and the project proposes to improve the parcel with Caltrans parking and storage uses that are consistent with this zone.

The proposed elements of the project are consistent with their current land use designations and zones; therefore, impacts to this issue area are considered less than significant.

XI. MINERAL RESOURCES -- Would the project:

a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

 \square

Potentially Significant Impact

Less than Significant Impact

Less Than Significant With Mitigation

No Impact

Discussion/Explanation:

No Impact: Both the main project site and the replacement parcels are within land classified by the California Department of Conservation – Division of Mines and Geology (Update of Mineral Land Classification: Aggregate Materials in the Western San Diego Production-Consumption Region, 1997) as an area where geologic information indicates no significant mineral deposits are present (MRZ-1). Moreover, if the resources are not considered significant mineral deposits, loss of these resources cannot contribute to a potentially significant cumulative impact.

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The project site is surrounded by a combination of densely developed land uses including commercial land uses which are incompatible with future extraction of mineral resources. There is a mining operation to the north of the project site. However, a future mining operation at the main project site would likely create a significant impact to other neighboring properties for issues such as noise, air quality, traffic, and possibly other impacts. Therefore, implementation of the project will not result in the loss of availability of a known mineral resource that would be of value since the mineral resource has already been lost due to incompatible land uses. No impacts are identified.

- b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?
 - Potentially Significant Impact Less than Significant Impact
 - Less Than Significant With Mitigation 🛛 No Impact

Discussion/Explanation:

No Impact: The southern parcels of the main project site are zoned CD Civic District, the central portion of the main project site is zoned V4 General District and the northern portions of the main project site is zoned V2 Rural District and V1 Natural District. The Julian replacement zone is also zoned as M52 Industrial and the Ramona replacement parcel is zoned M54 Industrial. 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 Land Use Element).

Therefore, no potentially significant impacts due to the loss of availability of a known mineral resource of locally important mineral resource recovery (extraction) site delineated on a local general plan, specific plan or other land use plan will occur as a result of this project.

XII. NOISE -- Would the project result in:

a) 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?

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Potentially Significant Impact	\square	Less than Significant Impact
Less Than Significant With Mitigation Incorporated		No Impact

Discussion/Explanation:

Less Than Significant Impact:

The project is a proposed community center and will be occupied by community center employees and patrons. The surrounding area supports commercial and natural land uses and is occupied by commercial facilities and the natural lands surrounding the Santa Maria Creek. The project will 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 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 Tables N-1 and N-2. Project implementation is not expected to expose existing or planned noise sensitive areas to road, airport, heliport, railroad, industrial or other noise in excess of the 60 dBA CNEL or 65 dBA CNEL 60 dB(A) contours). Therefore, the proposed project will 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 project's property line. The southern parcels within the main project site where civic facilities are proposed are zoned as CD Civic District that has a one-hour average sound limit of CNEL 50 dBA. The central portion of the main project site where additional civic facilities are also proposed is zoned V4 General District that

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has a one-hour average sound limit of CNEL 60 dBA. The properties adjacent to these areas are zoned V5 Center District which has a one-hour average sound limit of CNEL 55 dBa or V4 General District, which has a one-hour average sound limit of CNEL 60 dBA.

The northern parcels where community recreational elements are proposed are zoned as V1 Natural District or V2 Rural District both of which have a one-hour average sound limit of CNEL 60 dBA. The properties adjacent to these areas are also zoned as V1 Natural District or V2 Rural District and have the same average sound limit of CNEL 60 dBa. The main project site's noise levels are not anticipated to impact adjoining properties or exceed County Noise Standards, which is CNEL 52.5 dBA on the southern parcels, CNEL 60 dBA on the middle and northern parcels of the main project site. In addition, the project does not involve any noise producing equipment that would exceed applicable noise levels at the adjoining property line.

Regarding the replacement parcels, the Ramona replacement parcel is zoned M54 Industrial, which has a one-hour average sound limit of CNEL 70 dBA. The parcels adjacent to the Ramona replacement parcel are zoned as M52 Industrial and M54 Industrial both of which have a one-hour average sound limit of CNEL 70 dBA. The Ramona replacement parcel's noise levels are not anticipated to impact adjoining properties or exceed County Noise Standards, which is CNEL 70 Dba.

The Julian replacement parcel is zoned M52 Industrial, which has a one-hour average sound limit of CNEL 70 dBA. The parcels adjacent to the Julian replacement parcel are zoned as M52 Industrial, A70 Agricultural, and RR Rural Residential. A70 Agricultural and RR Rural Residential zones have a one-hour average sound limit of CNEL 50 dBA. The Julian replacement parcel's noise levels are not anticipated to impact adjoining properties or exceed County Noise Standards, which is CNEL 60 Dba.

Noise Ordinance – Section 36.409

The project will not generate construction noise that may exceed the standards of the County of San Diego Noise Ordinance (Section 36.409). Construction operations will occur only during permitted hours of operation pursuant to Section 36.409. Also, it is not anticipated that the project will operate construction equipment in excess of an average sound level of 75dB between the hours of 7 AM and 7 PM.

Noise Ordinance – Section 36.410

The project will not generate construction noise that may exceed the standards of the maximum sound level that may be generated on an occupied property as specific in the County of San Diego Noise Ordinance (Section 36.410).

Finally, the project's conformance to the County of San Diego General Plan Noise Element and County of San Diego Noise Ordinance (Section 36.404 36.409 and 36.410) ensures the project will not create cumulatively considerable noise impacts, because the project will not exceed the local noise standards for noise sensitive COMMUNITY CAMPUS; 1018658 and 1018659 - 73 - RAMONA INTERGENERATIONAL NOVEMBER 2016

areas; and the project will 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. Therefore, the project will 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.

b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Potentially Significant Impact		Less than Significant Impact
Less Than Significant With Mitigation	\boxtimes	No Impact

Discussion/Explanation:

No Impact: The proposed project on the main project site is a community center, of which low ambient vibration is expected for some uses. The community center would not create a use that would be characterized as creating excessive amounts of vibration or groundborne noise levels. Further, 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 groundborne vibration or groundborne noise levels on-site or in the surrounding area. The infrastructure improvements for the project would be minor utility extensions to connect to the project site to existing infrastructure and curb, gutter and sidewalk improvements.

Likewise, the improvements proposed on the replacement parcels are for Caltrans storage and parking purposes. These improvements would not create a use that would be characterized as creating excessive amounts of vibration or groundborne levels.

Therefore, the proposed project will not expose persons to or generate excessive groundborne vibration or groundborne noise levels on a project or cumulative level.

c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

Potentially Significant Impact	\boxtimes	Less than Significant Impact
Less Than Significant With Mitigation		No Impact

Discussion/Explanation:

Less Than Significant Impact: The improvements on the replacement parcels include unmanned facilities that do not support any noise generating equipment. Therefore, these improvements would not result in a substantial permanent increase in existing ambient noise levels in the project vicinity.

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The main project site involves the following permanent noise sources that may increase the ambient noise level: CNEL 60 dBA: HVAC equipment, vehicles, and general construction activity. As indicated in the response listed under Section XI Noise, Question a., 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 project is not expected to expose existing or planned noise sensitive areas to direct noise impacts. Project related noise sources such as additional vehicular traffic on nearby roadways are estimated to be 2,204 ADT. Project traffic contributions to nearby roadways would not double the existing noise conditions and the project would not produce any direct noise impacts to existing or planned noise sensitive land uses.

The project will not result in cumulatively noise impacts because a list of past, present and future projects within in the vicinity were evaluated. It was determined that the project in combination with a list of past, present and future project would not expose existing or planned noise sensitive areas to noise 10 dB CNEL over existing ambient noise levels.

- d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?
- Potentially Significant Impact
 Less Than Significant With Mitigation
 Incorporated
 No Impact

Discussion/Explanation:

Less Than Significant Impact: 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, 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 operations will occur only during permitted hours of operation pursuant to Section 36-410. Also, it is not anticipated that the project will operate construction equipment in excess of 75 dB for more than an 8 hours during a 24-hour period. Therefore, the project would not result in a substantial temporary or periodic increase in existing ambient noise levels in the project vicinity.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport,

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would the project expose people residing or working in the project area to excessive noise levels?

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Potentially Significant Impact 🛛 Less than Significant Impact

Less Than Significant With Mitigation
No Impact
Incorporated

Discussion/Explanation:

Less Than Significant Impact: The proposed project is located within Review Area 2 of the Ramona Airport Land Use Compatibility Plan (ALUCP). Transportation noise exceeding CNEL 55 dB(A) is created by flight operations at Ramona Airport, and the Ramona Community Plan anticipates that the area of noise impact from the Ramona Airport will increase. In an effort to control noise sources in the planning area and keep the environment free of excessive and damaging noise, the Community Plan encourages land use and circulation patterns which will minimize noise in residential neighborhoods. The Community Plan designates land adjacent to Ramona Airport for uses that are compatible with airport uses. The main project site does not propose any residential use, and the project area to excessive noise levels in excess of the CNEL 55 dB(A). The location of the proposed project is in Area 2 of the Noise compatibility map and is outside of the CNEL 60 dB(A) contours for the airport.

In addition, based on the list of past, present and future projects there are no new or expanded public airports projects in the vicinity that may extend the boundaries of the CNEL 60 dB noise contour. Refer to XVIII. Mandatory Findings of Significance for a comprehensive list of the projects considered. Therefore, the project will not expose people residing or working in the project area to excessive airport-related noise on a project or cumulative level.

f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

Potentially Significant Impact

Less than Significant Impact

Less Than Significant With Mitigation No Impact

Discussion/Explanation:

No Impact: The proposed project is not located within a one-mile vicinity of a private airstrip; therefore, the project will not expose people residing or working in the project area to excessive airport-related noise levels.

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XIII. POPULATION AND HOUSING -- Would the project:

a) Induce substantial 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)?

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Potentially Significant Impact	\square	Less than Significant Impact
Less Than Significant With Mitigation Incorporated		No Impact

Discussion/Explanation:

Less Than Significant Impact: The project proposes to extend infrastructure in the form of minor utility extensions to connect the project site to existing infrastructure and minor curb, gutter and sidewalk improvements. However, this physical change will not induce substantial population growth in an area, because the extension of infrastructure such as utilities or roadways into previously unserved areas is consistent with the County General Plan, the Ramona Community Plan and will be consistent with County planning goals.

b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

Potentially Significant Impact		Less than Significant Impact
Less Than Significant With Mitigation Incorporated	\square	No Impact

Discussion/Explanation:

No Impact:

The proposed project will not displace any existing housing since the main project site is primarily vacant with limited storage on the Caltrans parcels, the Ramona replacement parcel is occupied by an industrial use, and the Julian replacement parcel is vacant.

c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

Potentially Significant Impact		Less than Significant Impact
Less Than Significant With Mitigation	\square	No Impact
Incorporated		

Discussion/Explanation:

No Impact: The proposed project will not displace a substantial number of people since the main project site is primarily vacant with limited storage on the Caltrans parcels, the Ramona replacement parcel is occupied by an industrial use, and the Julian replacement parcel is vacant.

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XIV. PUBLIC SERVICES -- Would the project:

a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance service ratios, response times or other performance objectives for any of the public services:

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- i. Fire protection?
- ii. Police protection?
- iii. Schools?
- iv. Parks?
- v. Other public facilities?

Potentially Significant Impact	\boxtimes	Less than Significant Impact
Less Than Significant With Mitigation Incorporated		No Impact

Discussion/Explanation:

Less Than Significant Impact: Based on the service availability forms received for the proposed project, the project will not result in the need for significantly altered services or facilities. Service availability forms have been provided which indicate services are available to the project from the following agencies/districts: Ramona Fire Department/Cal Fire (dated August 26, 2015). Pursuant to the project facility availability form, government facilities are currently adequate to serve the proposed project and acceptable service ratios, response times or other performance service ratios or objectives for any public services will be maintained.

XV. RECREATION

a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Potentially Significant Impact		Less than Significant Impact
Less Than Significant With Mitigation Incorporated	\square	No Impact

Discussion/Explanation:

No Impact: The proposed project does not propose any residential use, included but not limited to a residential subdivision, mobilehome park, or construction for a single-family residence that may increase the use of existing neighborhood and regional parks or other recreational facilities in the vicinity. The project also provides a number of new recreational amenities for the area.

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?

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	Potentially Significant Impact	Less than Significant Impact
\boxtimes	Less Than Significant With Mitigation	No Impact

Incorporated

Discussion/Explanation:

Less Than Significant Impact With Mitigation Incorporated: The project involves the development of a number of new recreational facilities including a playing field, playground, pedestrian trail, community gym/teen center, senior facility, picnic areas and a skate park. However, as outlined in this Environmental Analysis Form, the new recreation facilities will not result in adverse physical effect on the environment because all related impacts from the proposed recreation facilities have been mitigated to a level below significance. Refer to the following Sections of this Initial Study for more information: Biological Resources, Cultural Resources, Hydrology & Water Quality, and Transportation / Traffic.

XVI. TRANSPORTATION AND TRAFFIC -- Would the project:

a) Conflict with an applicable plan, ordinance or policy establishing measures of the effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths and mass transit?

Potentially Significant Impact

Less than Significant Impact

Less Than Significant With Mitigation
No Impact
No Impact

Discussion/Explanation:

Less Than Significant With Mitigation Incorporated: A Traffic Impact Analysis, dated September 23, 2015, prepared by John Boarman of Linscott, Law and Greenspan was completed for the proposed project. The Traffic Impact Analysis identified that the proposed project would result in an additional 2,204 Average Daily Trips (ADT) to the project area. The project trips will be distributed to Main Street (SR-67), 13th Street, 12th Street and B Street. The Traffic Impact Analysis found that the proposed project would not result in any significant direct traffic impacts to study area intersections and street segments. However when analyzing the proposed project plus cumulative projects, the Traffic Impact Analysis found that the proposed project would have a significant cumulative traffic impact on the intersection at Main Street and 12th Street. Mitigation would be required to reduce the Project's cumulative traffic impact to below a level of significance.

The County of San Diego has developed an overall programmatic solution that addresses existing and projected future road deficiencies in the unincorporated portion of San Diego County. The Traffic Impact Fee (TIF) program creates a mechanism to proportionally fund improvements to roadways necessary to mitigate potential cumulative impacts caused by traffic from future development. Therefore the mitigation measure that would be required to mitigate the project's cumulative traffic impact to below significance includes **MM-TRA-1** below:

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MM-TRA-1 At the issuance of building permits, the applicant shall pay the required Traffic Impact Fee (TIF) to the TIF program.

By ensuring TIF funds are spent for the specific roadway improvements identified in the TIF Program, the CEQA mitigation requirement is satisfied and the Mitigation Fee nexus is met. Therefore, payment of the TIF will mitigate potential cumulative traffic impacts to less than significant.

Therefore, with the incorporation of the **MM-TRA-1**, the proposed project would not have a cumulative impact related traffic to a conflict with policies establishing measures of the effectiveness for the performance of the circulation system.

- b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?
- Potentially Significant Impact
 Less Than Significant With Mitigation Incorporated
 Less Than Significant With Mitigation
 No Impact

Discussion/Explanation: The designated congestion management agency for the San Diego region is SANDAG. SANDAG is responsible for preparing the Regional Transportation Plan (RTP) of which the Congestion Management Program (CMP) is an element to monitor transportation system performance, develop programs to address near- and long-term congestion, and better integrate land use and transportation planning decisions. The CMP includes a requirement for enhanced CEQA review applicable to certain large developments that generate an equivalent of 2,400 or more average daily vehicle trips or 200 or more peak hour vehicle trips. These large projects must complete a traffic analysis that identifies the project's impacts on CMP system roadways, their associated costs, and identify appropriate mitigation. Early project coordination with affected public agencies, the Metropolitan Transit System (MTS) and the North County Transit District (NCTD) is required to ensure that the impacts of new development on CMP transit performance measures are identified.

Less Than Significant With Mitigation Incorporated: A Traffic Impact Analysis, dated September 23, 2015, prepared by John Boarman of Linscott, Law and Greenspan was completed for the proposed project. The Traffic Impact Analysis

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identified that the proposed project would result in an additional 2,204 ADT. Project trips would be distributed to the following CMP designated facilities: CMP Highways. Direct and/or cumulative impacts were identified to the following CMP roadways: SR-67 (otherwise known as Main Street). Mitigation Measure **MM-TRA-1**, summarized above, was identified in the Traffic Impact Analysis to mitigate the proposed project's significant cumulative traffic impact to identified CMP facilities to below a level of significance.

Therefore, with the incorporation of **MM-TRA-1**, the proposed project would not conflict with the applicable congestion management program because CMP impacts would be fully mitigated.

 \boxtimes

c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?



Potentially Significant Impact Less Than Significant With Mitigation Incorporated Less than Significant Impact No Impact

Discussion/Explanation:

Less Than Significant: The main compatibility concerns for the protection of airport airspace are related to airspace obstructions (building height, antennas, etc.) and hazards to flight (wildlife attractants, distracting lighting or glare, etc.). The proposed project's main project site is located within the Ramona Airport Influence Area. The project proposes the development of community center and community recreational facilities, and is located within Review Area 2 for the Ramona Airport. The proposed land uses are consistent with the allowable land uses identified for Review Area 2 of the Airport Influence Area within the Ramona ALUCP. The proposed project would not result in a change in air traffic patterns because the allowable land uses are not within airport safety zones that are created for the purpose of ensuring ongoing airport safety, including maintenance of air traffic patterns. Furthermore, the project would not exceed the FAR Part 77 criteria related to airspace obstructions (refer also to Section VIII, Hazards and Hazardous Materials, Question d). Therefore, the proposed project will not have a significant impact on air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks. Impacts for this issue area would be less than significant.

- d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?
- Potentially Significant Impact
 Less than Significant Impact
 Less Than Significant With Mitigation
- Incorporated

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Discussion/Explanation:

Less Than Significant Impact: The proposed project will not significantly alter roadway geometry on Main Street (otherwise known as SR-67), 12th Street, 13th Street or B Street. A safe and adequate sight distance of 300 feet shall be required at all driveways and intersections to the satisfaction of the Director of the Department of Public Works. All road improvements will be constructed according to the County of San Diego Public and Private Road Standards. The proposed project will not place incompatible uses (e.g., farm equipment) on existing roadways. Therefore, the proposed project will not significantly increase hazards due to design features or incompatible uses.

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- e) Result in inadequate emergency access?
 - Potentially Significant ImpactImpactLess than Significant ImpactLess Than Significant With MitigationIncorporatedNo Impact

Discussion/Explanation:

Less Than Significant: The proposed project will not result in inadequate emergency access. The Ramona Fire Department (a cooperative agreement between the California Department of Forestry and the Ramona Municipal Water District) is the Fire Authority Having Jurisdiction, and has reviewed the proposed project and associated emergency access roadways and has determined that there is adequate emergency fire access proposed. The project has primary vehicular access points at two points along 12th Street and three points along 13th Streets. Additionally, roads used will be required to be improved to County standards.

- f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?
 - Potentially Significant Impact Less than Significant Impact
 - Less Than Significant With Mitigation Discussion No Impact

Discussion/Explanation:

Less Than Significant: The proposed project is for the development of community center and community recreational facilities and will generate 2,204 ADT. Project implementation will not result in the construction of any road improvements or new road design features that would interfere with the provision of public transit, bicycle or pedestrian facilities. In addition, the project does not generate sufficient travel demand to increase demand for transit, pedestrian or bicycle facilities. Therefore, the project will not conflict with policies, plans, or programs regarding public transit, bicycle or pedestrian facilities, or otherwise decrease the performance or safety of such facilities.

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XVII. UTILITIES AND SERVICE SYSTEMS -- Would the project:

a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?



Potentially Significant Impact Less Than Significant With Mitigation Less than Significant Impact

No Impact

Discussion/Explanation:

Incorporated

Less Than Significant Impact: The project proposes to discharge domestic waste to a community sewer system that is permitted to operate by the Regional Water Quality Control Board (RWQCB). A Project Facility Availability Form, dated September 22, 2015 was received from RMWD indicating that the District is anticipated to have adequate capacity for the project wastewater disposal needs within the next five years upon completion of the conditions outlined in the Project Service Availability Form (attached in Appendix F). In addition, the County received a Sewer System Evaluation on August 28, 2009 (attached in Appendix F) that indicates that sewer services may be provided by the RMWD without conflicting with future projects (the RICC project) or requirements upon the extension of sewer facilities under Alternative 1, described in the evaluation. The County has coordinated with the RMWD and adhered to the requirements that are identified in the service availability letter and expanded sewer facilities accordingly to the course of action identified under the requirement for sewer service in the Sewer System Evaluation. Therefore, adequate sewer facilities exist.

The proposed project will be discharging wastewater to a RWQCB permitted community sewer system and will be required to satisfy the conditions listed in the Project Facility Availability Letter, the project is consistent with the wastewater treatment requirements of the RWQCB, including the Regional Basin Plan. Impacts are less than significant.

b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Potentially Significant Impact	\boxtimes	Less than Significant Impact
Less Than Significant With Mitigation		No Impact
Incorporated		

Discussion/Explanation:

Less Than Significant Impact: The project requires water service from the Ramona Municipal Water District. A project facility availability form, dated September 26, 2015, has been provided for the proposed project by the Ramona Municipal Water District (RMWD) (attached in Appendix F) that indicate water facilities are reasonably expected to become available within five years, if the certain

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conditions as outline in the Project Service Availability Form (attached in Appendix F). are met. No new facilities or expansion of facilities is anticipated for the proposed project. Impacts are less than significant.

c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

	Potentially Significant Impact	Less than Significant Impact
\square	Less Than Significant With Mitigation	No Impact
	Incorporated	

Discussion/Explanation:

Less Than Significant With Mitigation Incorporated: As discussed in Section IX, Hydrology and Water Quality, Question g, the proposed project would be classified a "Priority Development Project" because it would exceed one acre in size, and therefore must be designed so that runoff rates and durations are controlled to maintain or reduce pre-project downstream erosion conditions and protect stream habitat. Compliance with the RPO, WPO and County standards will 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 covey such flows. This would include adequately sizing stormwater conveyances and including drainage features such as energy dissipation devices at the project's outlet.

With the implementation of MM-HYD-2, the County 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 preand 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. Therefore, if new stormwater facilities are determined to be necessary for the proposed project, they will be constructed in a manner that would not cause significant environmental effects. Impacts would be less than significant with mitigation incorporated.

d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Potentially Significant Impact Less Than Significant With Mitigation Incorporated

Less than Significant Impact

No Impact

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Discussion/Explanation:

Less Than Significant Impact:

The project requires water service from the Ramona Municipal Water District. A Project Facility Availability Form from the Ramona Municipal Water District, dated September 23, 2015, has been provided (attached in Appendix F), indicating adequate water resources and entitlements are available to serve the requested water resources. Therefore, the project will have sufficient water supplies available to serve the project.

e) 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?

 \bowtie



Potentially Significant Impact Less Than Significant With Mitigation Incorporated Less than Significant Impact

No Impact

Discussion/Explanation:

Less Than Significant Impact: The project requires wastewater service from the Ramona Municipal Water District. A Project Facility Availability Form from the Ramona Municipal Water District, dated September 26, 2015, has been provided, indicating adequate wastewater service capacity is available to serve the requested demand. Therefore, the project will not interfere with any wastewater treatment provider's service capacity.

- f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?
 - Potentially Significant Impact
 Less Than Significant With Mitigation
 No Impact

Discussion/Explanation:

Incorporated

Less Than Significant Impact: Implementation of the project will generate solid waste. All solid waste facilities, including landfills require solid waste facility permits to operate. In San Diego County, the County Department of Environmental Health, Local Enforcement Agency issues solid waste facility permits with concurrence from the California Integrated Waste Management Board (CIWMB) under the authority of the Public Resources Code (Sections 44001-44018) and California Code of Regulations Title 27, Division 2, Subdivision 1, Chapter 4 (Section 21440et seq.). There are five, permitted active landfills in San Diego County with remaining capacity. Therefore, there is sufficient existing permitted solid waste capacity to accommodate the project's solid waste disposal needs.

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- g) Comply with federal, state, and local statutes and regulations related to solid waste?
 - Potentially Significant Impact Less Than Significant With Mitigation Incorporated

Discussion/Explanation:

Less than Significant Impact: Implementation of the project will generate solid waste. All solid waste facilities, including landfills require solid waste facility permits to operate. In San Diego County, the County Department of Environmental Health, Local Enforcement Agency issues solid waste facility permits with concurrence from the California Integrated Waste Management Board (CIWMB) under the authority of the Public Resources Code (Sections 44001-44018) and California Code of Regulations Title 27, Division 2, Subdivision 1, Chapter 4 (Section 21440et seq.). The project will deposit all solid waste at a permitted solid waste facility and therefore, will comply with Federal, State, and local statutes and regulations related to solid waste.

XVIII. MANDATORY FINDINGS OF SIGNIFICANCE:

- a) Does the project have 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, 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?

Potentially Significant Impact Less Than Significant With Mitigation Less than Significant Impact No Impact

Discussion/Explanation:

Incorporated

Less than Significant with Mitigation Incorporated: Per the instructions for evaluating environmental impacts in this Initial Study, 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 sections IV and V of this form. In addition to project specific impacts, this evaluation considered the projects potential for significant cumulative effects. Resources that have been evaluated as significant would be potentially impacted by the proposed project, particularly southern willow scrub, non-native grassland, san diego gumplants, and migratory birds. However, mitigation has been included that clearly reduces these effects to a level below significance. This

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mitigation includes: the installation of a 200-foot wetland buffer, purchase of nonnative grassland on a County approved mitigation site, purchase of gumplants on a County approved mitigation site, and pre-construction surveys for migratory birds. As a result of this evaluation, there is no substantial evidence that, after mitigation, significant effects associated with this project would result. Therefore, this project has been determined not to meet this Mandatory Finding of Significance.

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

 \boxtimes

Potentially Significant Impact Less Than Significant With Mitigation Incorporated Less than Significant Impact No Impact

Discussion/Explanation:

The following list of past, present and future projects were considered and evaluated as a part of this Initial Study:

PROJECT NAME	
Robertson St. Apartments	

Per the instructions for evaluating environmental impacts in this Initial Study, the potential for adverse cumulative effects were considered in the response to each question in sections I through XVIII of this form. In addition to project specific impacts, this evaluation considered the projects potential for incremental effects that are cumulatively considerable. As a result of this evaluation, there were determined to be potentially significant cumulative effects related to biological resources and cultural resources. However, mitigation has been included that clearly reduces these cumulative effects to a level below significance. This mitigation includes: the installation of a 200-foot wetland buffer, purchase of nonnative grassland on a County approved mitigation site, purchase of gumplants on a County approved mitigation site, pre-construction surveys for migratory birds, and an archeological monitoring program. As a result of this evaluation, there is no substantial evidence that, after mitigation, there are cumulative effects associated with this project. Therefore, this project has been determined not to meet this Mandatory Finding of Significance.

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

\square	Potentially Significant Impact Less Than Significant With Mitigation	Less than Significant Impact No Impact
	Incorporated	 ·
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Discussion/Explanation:

Less Than Significant with Mitigation Incorporated: In the evaluation of environmental impacts in this Initial Study, the potential for adverse direct or indirect impacts to human beings were considered in the response to certain questions in sections I. Aesthetics, III. Air Quality, IV. Biological Resources, V. Cultural Resources, VI. Geology and Soils, VIII. Hazards and Hazardous Materials, IX Hydrology and Water Quality, XVI. Transportation and Traffic, and XVII Utilities and Service.

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As a result of this evaluation, there were determined to be potentially significant effects to human beings related to the following: Biological Resources, Cultural Resources, Hazards and Hazardous Materials, Hydrology and Water Quality, and Transportation and Traffic. However, mitigation has been included that clearly reduces these effects to a level below significance. This mitigation includes: the installation of a 200-foot wetland buffer, purchase of nonnative grassland on a County approved mitigation site, purchase of gumplants on a County approved mitigation site, purchase of gumplants on a county approved mitigation site, pre-construction surveys for migratory birds, an archaeological monitoring program. As a result of this evaluation, there is no substantial evidence that, after mitigation, there are adverse effects to human beings associated with this project. Therefore, this project has been determined not to meet this Mandatory Finding of Significance.

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XIX. REFERENCES USED IN THE COMPLETION OF THE INITIAL STUDY CHECKLIST

All references to Federal, State and local regulation are available on the Internet. For Federal regulation refer to http://www4.law.cornell.edu/uscode/. For State regulation refer to www.leginfo.ca.gov. For County regulation refer to www.amlegal.com. All other references are available upon request.

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