



County of San Diego

MARK WARDLAW
DIRECTOR
PHONE (858) 694-2962
FAX (858) 694-2555

PLANNING & DEVELOPMENT SERVICES
5510 OVERLAND AVENUE, SUITE 310, SAN DIEGO, CA 92123
www.sdcounty.ca.gov/pds

DARREN GRETLER
ASSISTANT DIRECTOR
PHONE (858) 694-2962
FAX (858) 694-2555

June 4, 2015

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

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

IES/SDG&E Solar Energy Project - Ramona
PDS2014-MUP-14-013
PDS2014-ER-14-09-003

2. Lead agency name and address:
County of San Diego, Planning & Development Services
5510 Overland Avenue, Suite 110
San Diego, CA 92123-1239

3. a. Contact Michael Johnson, Project Manager
b. Phone number: (858) 694-3429
c. E-mail: Michael.Johnson1@sdcounty.ca.gov.

4. Project location:

The project site is located at the northwestern intersection of Creelman Lane and Ashley Road, in the Ramona Community Plan area, within unincorporated San Diego County (portion of APN 284-340-35-00).

Thomas Guide Coordinates: Page 1172, Grid H/2

5. Project Applicant name and address:

Eric Johnston; Independent Energy Solutions, Inc., 1090 Joshua Way, Vista, CA 92081
Phone: 760-509-3128

6. General Plan
Community Plan: Ramona
Land Use Designation: Public/Semi-Public Facilities (P/SP)
Density: No Density
Floor Area Ratio (FAR) 0.50

- 7. Zoning
 - Use Regulation: A70 (Limited Agriculture)
 - Minimum Lot Size: 4 Acres
 - Special Area Regulation: D2, Portion F

8. Description of project:

The project is a Major Use Permit to construct a 4.0 Megawatt solar energy facility. The project consists of one phase covering approximately 18.3 acres and includes solar modules mounted on a fixed tilt system with a maximum height of 11.5 feet, inverters, AC switchgear, medium voltage transformers, and other associated equipment. The project also includes a 24-foot perimeter access driveway and will be surrounded by a 8-foot tall fence. The project site is located at the northwest corner of Creelman Lane and Ashely Road (portion of APN 284-340-35) in the Ramona Community Planning area, within unincorporated San Diego County. The site is subject to the General Plan Land Use Designation Public Semi-Public Lands. Zoning for the site is A70 and contains a D2 (Design Review) and F (Floodplain) Special Area Regulations.

Temporary access is proposed from an existing driveway located along Ashley Road and permanent access would be provided by a private driveway connecting to Creelman Lane. The project would be served by both groundwater for ongoing maintenance and landscaping and water obtained from the Ramona Municipal Water District for construction. No extension of sewer or water utilities will be required by the project. The project also includes a 10-foot wide pathway along Creelman Lane and landscaping around the western, southern, and eastern project boundary. Temporary privacy screen fabric and slats are proposed around the fence and berms are proposed along Creelman Lane. The temporary screen fabric will remain for the first five years to help shield the facility from view while the proposed landscaping matures. The permanent slats are proposed along the northern fence boundary to reduce views of the project from the north and Ashley Raod. Earthwork will consist of cut and fill of approximately 2,608 cubic yards of material.

9. Surrounding land uses and setting:

Lands surrounding the project site are used for agricultural/equestrian uses, residential uses, or are vacant. The topography of the project site and adjacent land is relatively flat. The site is located approximately 1.4 miles south east of Highway 67.

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

Permit Type/Action	Agency
Landscape Plans	County of San Diego
Major Use Permit	County of San Diego
Site Plan	County of San Diego
County Right-of-Way Permits Construction Permit	County of San Diego

Excavation Permit Encroachment Permit	
Grading Permit Grading Permit Plan Change	County of San Diego
Improvement Plans	County of San Diego
National Pollutant Discharge Elimination System (NPDES) Permit	RWQCB
General Construction Storm water Permit	RWQCB
Water District Approval	Ramona Water District
Fire District Approval	Ramona Fire District

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.

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

DETERMINATION: (To be completed by the Lead Agency)

On the basis of this initial evaluation:

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



Signature

6/4/15

Date

Michael Johnson

Printed Name

Land Use/Environmental Planner

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 project-specific screening analysis).
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.
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

I. AESTHETICS -- Would the project:

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

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

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.

Less Than Significant Impact: The proposed project is a Major Use Permit for a 4.0 MW solar energy facility. A Visual Resources Report for the proposed project, dated May 15, 2015, was prepared by KTU&A Planning + Landscape Architecture. Based on the results of the visual resources analysis, the project has been determined to be compatible with the existing visual environment in terms of visual character and quality for the following reasons: Scenic vistas are not readily available in the immediate project vicinity or within the Semi-Rural/Agricultural Landscape Character Unit of the project. The hillsides and distant mountains that comprise the horizon line of the valley within which the project site is located would not be substantially obstructed by proposed project elements. Views of the project site from the Undeveloped/Hillside Landscape Character Unit that include the project site are at the closest approximately 0.75 to 1 mile from the project site. The distance of the viewer from the proposed project elements would render them indistinct. The project components would become minor pieces of the overall view to or from the Hillside/Undeveloped Landscape Character Unit. The proposed project would change the visual elements of the project site, but the contrast created by the project would be minimal, and the project features would not detract from the existing visual character and quality of the area. Additionally, the proposed project would be consistent and would comply with the Ramona Community Design Guidelines. The project would not remove or change a feature that contributes to the valued visual character or image of the neighborhood, community, or localized area, such as designated landmarks, historic resources, trees, or rock outcroppings. The Project as designed would also not result in an inconsistency with any goals, standards, or policies related to visual resources as given in the County General Plan, Ramona Community Plan, Ramona Design Guidelines, or other applicable regulations and ordinances.

Additionally, design measures including buffering the project from potential viewers with proposed landscaping, setbacks, and other design measures have been included to reduce views of the project. Setbacks of 70-75 feet north of Creelman Lane, 50-55 feet west of Casteel Lane, 50-300 feet east of Ashley Road, and between approximately 300-750 feet

south of the northern property line are proposed to distance viewers from the development. Furthermore, the project site would be landscaped in accordance with an approved Landscape Plan to further screen the site the MUP area perimeter. The use of a variety of vegetation is proposed, including but not limited to, California Mountain Lilac, California Sunflower, Toyon, Common Lantana, Laurel Sumac, Deergrass, Showy Penstemon, Variegatum – Moch Orange, Coffeeberry, Lemonadeberry, White Sage, Cleveland Sage, Mexican Elderberry, Lemon Bottlebrush, African Sumac, Stone Pine, and Hollywood Juniper. The project also proposes earthen berms along Creelman Lane, a temporary fabric screening cloth along the southern, western, and eastern fence line for the first five years of the facility while the landscaping matures, and permanent slats along the northern property line. Finally, the proposed panel system would be kept to a minimal height to visibly reduce the panels within the existing landscape. Onsite structures (e.g. inverter enclosures) would be constructed with an exterior surface that is earth toned.

The project will not result in cumulative impacts on a scenic vista because the proposed project viewshed 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 comprehensive list of the projects considered. Those projects listed in Section XVII are located within the scenic vista’s viewshed and will not contribute to a cumulative impact because: The cumulative projects within the viewshed and one mile of the project site would be consistent with the diverse visual character of the area, would conform with applicable General Plan land use and zoning regulations as well as local design guidelines, and would not create a high level of visual contrast. Existing vegetation near the other recent solar development in the area ensures that both the proposed project and the other solar project are not visible in the same views. Cumulative effects between the proposed project and the cumulative projects would be less than significant due to the distance and local screening vegetation between other projects in the area and the proposed project that limit inclusive views of more than one proposed development within one scene at a time. The project would not remove or change a feature that contributes to the valued visual character or image of the neighborhood, community, or localized area, such as designated landmarks, historic resources, trees, or rock outcroppings. Furthermore, the project site would be landscaped in accordance with an approved Landscape Plan to further screen the site from the surrounding area and roads. 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?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> 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.

Less Than Significant Impact: The proposed project is a Major Use Permit for a 4.0 MW solar energy facility. A Visual Resources Report for the proposed project, dated May 15, 2015, was prepared by KTU&A Planning + Landscape Architecture. Based on the results of the visual resources analysis, the project has been determined that the project would not substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic building within a state scenic highway for the following reasons: The project would not remove or change a feature that contributes to the valued visual character or image of the neighborhood, community, or localized area, such as designated landmarks, historic resources, trees, or rock outcroppings. The project would construct a segment of one community pathway and accommodate another future pathway ("trails" within the adopted Ramona Community Trails and Pathways Plan). The proposed project features would not obstruct, interrupt, or detract from views from these pathways, and the visible features of the proposed project would have a less than significant impact on views from these areas. Additionally, the project would have a less than significant impact on views where it is visible from San Vicente Road because of intervening development and existing vegetation between San Vicente Road and the project site block views from the roadway in this area to the site. The project would not impact any other scenic highways because it would not be visible from other scenic roadways in the area. Two County routes have been designated as State Scenic Highways which include: (1) State Route 78 through the Anza Borrego Desert State Park (18.2-mile segment) and (2) State Route 125 from State Route 94 in Spring Valley to Interstate 8 in La Mesa (2 miles of this segment are in the unincorporated County). The project site cannot be seen from either of these two road segments. Furthermore, the project site would be landscaped in accordance with an approved Landscape Plan, contain berms along Creelman Lane, and include temporary screening cloth and permanent fence slats as indicated on the plot plan. The temporary screen fabric will remain for the first five years to help shield the facility from view while the proposed landscaping matures. The permanent slats are proposed along the northern fence boundary to reduce views of the project. This landscaping, fencing, and berms will further screen the site from Creelman Lane, Ashley Road, and proposed pathway.

The project will not result in cumulative impacts on a scenic vista because the proposed project viewshed 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 comprehensive list of the projects considered. Those projects listed in Section XVII are located within the scenic vista's viewshed and will not contribute to a cumulative impact because: The cumulative projects within the viewshed and one mile of the project site would be consistent with the diverse visual character of the area, would conform with applicable General Plan land use and zoning regulations as well as local design guidelines, and would not create a high level of visual contrast. Existing vegetation near the other recent solar development in the area ensures that both the proposed project and the other solar project are not visible in the same views. Cumulative effects between the proposed project and the cumulative projects would be less than significant due to the distance and local screening vegetation between other projects in the area and the proposed project that limit inclusive views of more than one proposed development within one scene at a time. The project would not remove or change a feature that contributes to the valued visual character or image of the

neighborhood, community, or localized area, such as designated landmarks, historic resources, trees, or rock outcroppings. Furthermore, the project site would be landscaped in accordance with an approved Landscape Plan to further screen the site from the surrounding area and roads. 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
- Less Than Significant With Mitigation Incorporated
- Less than Significant Impact
- No Impact

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 project site and surrounding can be characterized as semi-rural and agricultural.

The proposed project is a Major Use Permit for a 4.0 MW solar energy facility. A Visual Resources Report for the proposed project, dated May 15, 2015, was prepared by KTU&A Planning + Landscape Architecture. Based on the results of the visual resources analysis, the project is compatible with the existing visual environment’s visual character and quality for the following reasons: The proposed project would not substantially change the visual quality of the Landscape Character Unit in which it would be located. The proposed panels would be arranged in a grid pattern similar to the existing palm trees and other agricultural features in the area, such as greenhouses or nurseries. When the proposed landscape matures, the plants would provide more naturalistic colors and textures, and from close viewpoints, would screen the fences and solar arrays. The northern portion of the site would remain undeveloped, and would continue to support the existing non-native grassland, which has similar visual characteristics as the pastures east and south of the project site. This would provide continuity between views of the area that include the project site and the neighboring properties. The introduction of the project elements would neither increase nor decrease the vividness of the visual environment of the area. Additionally, the proposed project would not remove or substantially change features that contribute to the valued visual character of the area, obstruct, interrupt, or detract from focal or panoramic vistas from public roads or recreational areas. The project incorporates landscape plants that are listed in the Ramona Design Guidelines and are present on many lots in the immediately surrounding area, ensuring that the project landscaping is visually similar to the surrounding area.

Additionally, design measures including buffering the project from potential viewers with proposed landscaping, setbacks, and other design measures have been included to reduce views of the project and to be compatible with the existing visual environment’s visual character and quality. Setbacks of 70-75 feet north of Creelman Lane, 50-55 feet west of

Casteel Lane, 50-300 feet east of Ashley Road, and between approximately 300-750 feet south of the northern property line are proposed to distance viewers from the development. Furthermore, the project site would be landscaped in accordance with an approved Landscape Plan to further screen the site the MUP area perimeter. The use of a variety of vegetation is proposed, including but not limited to, California Mountain Lilac, California Sunflower, Toyon, Common Lantana, Laurel Sumac, Deergrass, Showy Penstemon, Variegatum – Moch Orange, Coffeeberry, Lemonadeberry, White Sage, Cleveland Sage, Mexican Elderberry, Lemon Bottlebrush, African Sumac, Stone Pine, and Hollywood Juniper. The project also proposes earthen berms along Creelman Lane, a temporary fabric screening cloth along the southern, western, and eastern fence line for the first five years of the facility while the landscaping matures, and permanent slats along the northern property line. Finally, the proposed panel system would be kept to a minimal height of 8 feet to 11.5 feet above ground surface to visibly reduce the panels within the existing landscape. Onsite structures (e.g. inverter enclosures) would be constructed with an exterior surface that is earth toned.

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 proposed project would contribute to the eclectic nature of the area, wherein the uses of each parcel is decided by individual owners resulting in a high degree of variation in the visual environment. No one land use and its associated visual character, dominates another. The cumulative projects within the viewshed and one mile of the project site would be consistent with the diverse visual character of the area, would conform with applicable General Plan land use and zoning regulations as well as local design guidelines, and would not create a high level of visual contrast. Existing vegetation near the other recent solar development in the area ensures that both the proposed project and the other solar project are not visible in the same views. Cumulative effects between the proposed project and the cumulative projects would be less than significant due to the distance and local screening vegetation between other projects in the area and the proposed project that limit inclusive views of more than one proposed development within one scene at a time. The project would not remove or change a feature that contributes to the valued visual character or image of the neighborhood, community, or localized area, such as designated landmarks, historic resources, trees, or rock outcroppings. Furthermore, the project site would be landscaped in accordance with an approved Landscape Plan to further screen the site from the surrounding area and roads. 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?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant Impact:The proposed project will use outdoor lighting and is located within Zone B as identified by the San Diego County Light Pollution Code. However, it will not adversely affect nighttime views or astronomical observations, because the project will conform to the Light Pollution Code (Section 59.101-59.115), including the Zone B lamp type and shielding requirements per fixture and hours of operation limitations for outdoor lighting and searchlights.

In addition, the proposed project will control outdoor lighting and sources of glare in the following ways:

1. The project will not install outdoor lighting that directly illuminates neighboring properties.
2. The project will not install outdoor lighting that would cast a direct beam angle towards a potential observer, such as a motorists, cyclist or pedestrian.
3. The project will not install outdoor lighting for vertical surfaces such as buildings, landscaping, or signs in a manner that would result in useful light or spill light being cast beyond the boundaries of intended area to be lit.
4. The project would install solar panels with an anti-reflective coating to ensure that the surfaces are not highly reflective or a high-gloss surface color that would be visible along roadways, pedestrian walkways, or in the line of sight of adjacent properties. Furthermore, the project site would be landscaped in accordance with an approved Landscape Plan to further screen the site from Creelman Lane, Ashley Road and the proposed pathway.

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 developed by the San Diego County Department of Planning and Land Use 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.

In addition, the project's outdoor lighting is controlled through the Major Use Permit, which further limits outdoor lighting through strict controls. Therefore, compliance with the Code, in combination with the outdoor lighting and glare controls listed above ensures that the project will not create a significant new source of substantial light or glare.

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?

- | | |
|--|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input checked="" type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant With Mitigation Incorporated: The project site has land designated as Farmlands of Local Importance and Unique Farmlands according to the State Farmland Mapping and Monitoring Program (FMMP) that is currently used as a palm nursery. Due to the presence of onsite agricultural resources, an Agricultural Analysis dated May 8, 2015 was completed by James Chagala based on the County’s Local Agricultural Resources Assessment (LARA) model which takes into account local factors that define the importance of San Diego County agricultural resources. The LARA model considers the availability of water resources, climate, soil quality, surrounding land use, topography, and land use or parcel size consistency between the project site and surrounding land uses. A more detailed discussion of the LARA model can be found in the Guidelines for Determining Significance for Agricultural Resources at <http://www.sdcdplu.org/dplu/Resource/docs/3~pdf/AG-Guidelines.pdf>.

In order for a site to be considered an important agricultural resource based on the LARA model, all three required LARA model factors (water, soil, and climate) must receive either a high or moderate score. A low score in any of these three categories would render a LARA model result that the site is not an important agricultural resource. Based on the Prime Farmland Soils, Climate and availability of water, the site is considered an important agricultural resource.

As a result, the project is required to mitigate the impacts to the Prime Farmland soils. The project as designed would directly impact a total of 5.407 acres of soils on the project site. Mitigation for the impacts to agricultural resources will be required through purchase of credits in the County of San Diego’s Purchase of Agricultural Conservation Easement (PACE) Program – **OR** – off-site preservation at a ratio of 1:1 for all impacted agricultural soils for a total of 5.407 acres – **OR** – on-site preservation of 5.407 agricultural mitigation. In addition, the project has been conditioned to maintain the viability of the on-site agricultural soils. Therefore, the impact to agricultural resources would be less than significant with mitigation incorporated.

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

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant Impact: The project site is zoned A70 (Limited Agriculture), which is considered to be an agricultural and residential zone. However, the proposed project will not result in a conflict in zoning for agricultural use, because a solar facility (Major Impact Services and Utilities) is a permitted use in the A70 zone upon approval of a Major Use Permit and will not create a conflict with existing zoning for a future agricultural use. Additionally, the project site's land is not under a Williamson Act Contract. Therefore, there will be no 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 Impact
- No Impact

Discussion/Explanation:

No Impact: The project site including offsite improvements 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 property 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 Impact
- No Impact

Discussion/Explanation:

No Impact: The project site including any offsite improvements 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, the project is not 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
- Less Than Significant With Mitigation Incorporated
- Less than Significant Impact
- No Impact

Discussion/Explanation:

Less Than Significant With Mitigation Incorporated: The project site and surrounding area within radius of one mile have land designated as Unique Farmland, Farmland of Local Importance, a Grazing Land. As discussed in the Agricultural Analysis, dated May 8, 2015, prepared by James Chagala on file with Planning & Development Services as Environmental Review Number PDS2014-ER-14-09-003, the project would impact a total of 5.407 acres of soils on the project site. Mitigation for the impacts to agricultural resources will be required through purchase of credits in the County of San Diego’s Purchase of Agricultural Conservation Easement (PACE) Program – **OR** – off-site preservation at a ratio of 1:1 for all impacted agricultural soils for a total of 5.407 acres – **OR** – on-site preservation of 5.407 agricultural mitigation. In addition, the project has been conditioned to maintain the viability of the on-site agricultural soils. Surrounding agricultural operations were reviewed and it was determined that the project would not have an impact on these operations because the project would be separated from the nearest agricultural use by over 100 feet and the project does not propose a use that would introduce people that would potentially be affected by an off-site agricultural operation. Therefore, no potentially significant project or cumulative level conversion of Prime Farmland, Unique Farmland, Farmland of Statewide Importance or Farmland of Local Importance to a non-agricultural use will occur as a result of this project with mitigation incorporated.

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)?

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

Discussion/Explanation:

Less Than Significant Impact: The Project site is located within the unincorporated town of Ramona in the County of San Diego. The proposed Project would consist of a solar generation facility capable of producing approximately 4 Megawatt (MW) of power.

The Project proposes to grub and grade the site and then install a photovoltaic (PV) array on an approximate 18.3-acre site. In addition, a 4,000 Gallon water tank would be installed which

would be used for annual maintenance/cleaning of the PV system. Construction of the proposed project is anticipated to take approximately 108 calendar days; however, construction duration would vary depending upon weather and seasonal factors and construction plan specifics developed during final design. The existing interior fire access road would be covered with decomposed granite, and all other disturbed areas would be covered with a binding agent to reduce dust once the project is constructed and operational.

The project would be limited to short-term grading, PV installation, and regular maintenance by San Diego Gas and Electric (SDG&E). No new employment opportunities or population growth inducing development is proposed; therefore, there would be no growth or substantial operational emissions associated with the project. Air emissions would be limited to fugitive dust and criteria air pollutants emitted during grading and associated with maintenance vehicular traffic. Construction-related emissions would be temporary and would cease at the completion of grading. Operational dust emissions associated with onsite vehicular traffic would be minimal as a permeable rock material would be used to cover all onsite access roads. Because the project would not result in substantial long-term operational emissions under this action, it is not expected to conflict with either the RAQS or the SIP.

b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?

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

Discussion/Explanation:

Less Than Significant Impact: 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 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) is used.

The project proposes balanced earthwork of approximately 2,608 cubic yards. In addition, approximately 609 cubic yards of rock or decomposed granite would be hauled to the site to be used for onsite road paving. The total construction would be expected to be completed in approximately 108 calendar days.

Emissions were estimated based on proposed grading activities and are shown below (see Air Quality Assessment dated May 13, 2015 for modeling inputs and outputs).

Construction Maximum Daily Emissions (lbs/day)

	ROG	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Construction Emissions	6.4	46.5	33.1	<1	69.5	16.4
<i>PDS Screening Level Thresholds</i>	75	250	550	250	100	55
Exceeds Threshold?	No	No	No	No	No	No
ROG = Reactive organic gases; NO _x = Oxides of nitrogen; CO = Carbon monoxide; SO _x = Oxides of sulfur; PM ₁₀ = Respirable particulate matter; PM _{2.5} = Fine particulate matter.						

As shown above, construction activities at this intensity would not exceed the County’s screening level thresholds. Additionally, grading operations associated with the construction of the project would be subject to County of San Diego Grading Ordinance, which requires the implementation of dust control measures and SDAPCD Rule 55. Emissions from the construction phase would be temporary and localized, resulting in pollutant emissions below the screening-level criteria established by the LUEG guidelines for determining significance.

The facilities would be operated and monitored remotely by SDG&E. Maintenance of the facilities would require occasional visual inspections and minor repairs. Additionally, an operation and maintenance contractor would wash the panels each year using a four-man crew. These operations can generate dust onsite from onsite service roads as well as vehicular exhaust emissions.

Operational emissions were estimated based on proposed operations and are shown (see Air Quality Assessment dated May 13, 2015 for modeling inputs and outputs).

Operational Daily Emissions (lbs/day)

	ROG	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
Operational Emissions	<1	<1	3.7	<1	16.4	1.8
<i>PDS Screening Level Thresholds</i>	75	250	550	250	100	55
Exceeds Threshold?	No	No	No	No	No	No
ROG = Reactive organic gases; NO _x = Oxides of nitrogen; CO = Carbon monoxide; SO _x = Oxides of sulfur; PM ₁₀ = Respirable particulate matter; PM _{2.5} = Fine particulate matter.						

As shown by the modeling conducted, emissions of criteria air pollutants associated with operational maintenance vehicles would not exceed applicable air quality standards. In addition, as a part of project construction, decomposed granite or crushed rock would be applied on all internal access roads, which would further reduce dust associated with vehicular traffic. Further, soil binders would be applied on the exposed ground surface surrounding the PV systems. 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
- Less Than Significant With Mitigation Incorporated
- Less than Significant Impact
- No Impact

Discussion/Explanation:

Less Than Significant Impact: 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) and Particulate Matter less than or equal to 2.5 microns (PM_{2.5}) 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.

Air quality emissions associated with the project include emissions of PM₁₀, PM_{2.5}, NO_x and VOCs from construction/grading activities and maintenance vehicles. As described in (b) above, construction and operational emissions would not exceed the County's screening level thresholds. Additionally, grading operations associated with the construction of the project would be subject to County of San Diego Grading Ordinance, which requires the implementation of dust control measures and SDAPCD Rule 55 and soil binder would be applied to exposed surfaces onsite as well as aggregate applied to existing unpaved roads. Emissions from the construction phase would be localized and temporary and operational emissions would be minimal. Project-related emissions of PM₁₀, PM_{2.5}, NO_x and VOC would be below the screening-level criteria established by the LUEG guidelines for determining significance.

In addition, no nearby construction projects were identified that could potentially contribute to cumulative emissions. Further, proposed construction is expected to be relatively short (i.e., 108 days) and estimated emissions are substantially below applicable thresholds. Long-term operational emissions would be associated with maintenance vehicles and total annual trips would be relatively minor (i.e., up to 544). Further, construction of the project would be required to minimize dust emissions per San Diego County Dust Ordinance and the project would apply soil binder to exposed onsite land as well as aggregate to existing unpaved roads-minimizing operational-related dust emissions that are already estimated to be substantially below applicable thresholds. Therefore, emissions associated with the proposed project are not expected to create a cumulatively considerable impact nor a considerable net increase of PM₁₀, PM_{2.5} or any O₃ precursors.

d) Expose sensitive receptors to substantial pollutant concentrations?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> 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 Impact: 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 because they house children and the elderly.

No sensitive receptors are located within a quarter-mile (the radius determined by the SCAQMD in which the dilution of pollutants is typically significant) of the proposed project. Nonetheless, a health risk screening analysis was conducted and is included in the Air Quality Assessment dated May 13, 2015. Based on the modeling conducted; construction of the proposed project would not result in an increase in cancer risk. In addition, the project will not contribute to a cumulatively considerable exposure of sensitive receptors to substantial pollutant concentrations because the proposed project has emissions below the screening-level criteria established by the LUEG guidelines for determining significance.

e) Create objectionable odors affecting a substantial number of people?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant Impact: 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 short-term construction activities. There are no sensitive receptors in close proximity to the project site. The project would not result in any new land uses typically considered to be associated with odorous emissions (e.g., refineries, coffee roasters, wastewater treatment plants, etc). In addition, odorous emissions disperse throughout the air as distance increases from the source. Therefore, considering that grading activities would be relatively short (i.e., two weeks), would be temporary, and would disperse with increasing distance from the source, grading activities would not affect a substantial number of people. Moreover, the effects of objectionable odors are localized to the immediate surrounding area and will not contribute to a cumulatively considerable odor impact.

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 Wildlife or CDFWU.S. Fish and Wildlife Service?

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

Discussion/Explanation:

Less than Significant with Mitigation Incorporated: Based on an analysis of the County’s Geographic Information System (GIS) records, the County’s Comprehensive Matrix of Sensitive Species and a Biological Impact Analysis Report (Merkel & Associates, Inc., May 15, 2015, the site supports 4.8 acres of non-native grassland, 12.1 acres of intensive agriculture and approximately 1.1 acres of urban/developed and disturbed lands. No sensitive plants were observed on site and the following wildlife species were observed onsite: red-shouldered hawk, turkey vulture, white-tailed kite, northern harrier and grasshopper sparrow.

Mitigation for impacts to non-native will be provided through the purchase of 2.55 acres of offsite non-native grassland habitat. In addition, the project will be conditioned to avoid the nesting bird breeding season, to include temporary construction fencing and include biological monitoring.

County staff reviewed the past, present, and probable future projects as listed in Section XVII(b) and has determined that the cumulative loss of non-native may cause a significant impact on candidate, sensitive, or special status species. However, this project’s contribution to the cumulative habitat loss will be less than cumulatively considerable because the project will be conditioned to purchase offsite mitigation that would be conserved in perpetuity.

Therefore, staff has determined that although the site supports native biological habitat, implementation of the mitigation measures described above will ensure that the project will not result in substantial adverse effects, or have a cumulatively considerable impact to 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 Wildlife or U.S. Fish and Wildlife Service.

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

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

Discussion/Explanation:

Less than Significant with Mitigation Incorporated: While the project site does not contain riparian habitat, it does contain non-native grassland which is considered sensitive natural communities by the County, the California Department of Fish and Wildlife, and the US Fish and Wildlife Service. As detailed in response a) above, direct, indirect and cumulative impacts to sensitive natural communities identified in the County of San Diego Resource Protection Ordinance, Fish and Wildlife Code, and Endangered Species Act are considered less than significant with mitigation incorporated.

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 With Mitigation Incorporated
- Less than Significant Impact
- No Impact

Discussion/Explanation:

No Impact: Based on the Biological Impact Analysis Report dated May 15, 2015 and prepared by Merkel & Associates, Inc., it has been determined that the proposed project site does not contain any wetlands as defined by Section 404 of the Clean Water Act, including, but not limited to, marsh, vernal pool, stream, lake, river or water of the U.S., that could potentially be impacted through direct removal, filling, hydrological interruption, diversion or obstruction by the proposed development. Therefore, no impacts will occur to wetlands defined by Section 404 of the Clean Water Act and under the jurisdiction of the Army Corps of Engineers.

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 Impact
- No Impact

Discussion/Explanation:

Less than Significant Impact: Based on an analysis of the County's Geographic Information System (GIS) records, the County's Comprehensive Matrix of Sensitive Species, and a Biological Impact Analysis Report dated May 15, 2015 prepared by Merkel & Associates, Inc., it has been determined that the site has limited biological value and impedance of the movement of any native resident or migratory fish or wildlife species, the use of an established native resident or migratory wildlife corridors, and the use of native wildlife nursery sites would not be expected as a result of the proposed project for the following reasons: the project site is surrounded by existing development and therefore wildlife movement through the site is highly constrained.

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

Discussion/Explanation:

Less Than Significant Impact: Refer to the attached Ordinance Compliance Checklist for further information on consistency with any adopted Habitat Conservation Plan, Natural Communities Conservation Plan, other approved local, regional or state habitat conservation plan, including, Habitat Management Plans (HMP), Special Area Management Plans (SAMP), or any other local policies or ordinances that protect biological resources including the Multiple Species Conservation Program (MSCP), Biological Mitigation Ordinance, Resource Protection Ordinance (RPO), Habitat Loss Permit (HLP).

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 Impact
- No Impact

Discussion/Explanation:

No Impact: Based on an analysis of records and a survey of the property by County of San Diego approved archaeologist, Mary Robbins-Wade, it has been determined that there are no impacts to historical resources because they do not occur within the project site. The results of the survey are provided in the cultural resources report titled, *Cultural Resources Inventory: Independent Energy Solutions, Inc. (IES)/San Diego Gas & electric (SDG&E) Solar Energy project – Ramona, San Diego County, California, PDS2014-MUP-14-013; Env. Log No. PDS2014-ER-14-09-003 (May 2015).*

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

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

Discussion/Explanation:

No Impact: Based on an analysis of records and a survey of the property by a County of San Diego approved archaeologist, Mary Robbins-Wade, it has been determined that the project

site does not contain any archaeological resources. The results of the survey are provided in an archaeological survey report entitled, *Cultural Resources Inventory: Independent Energy Solutions, Inc. (IES)/San Diego Gas & electric (SDG&E) Solar Energy project – Ramona, San Diego County, California, PDS2014-MUP-14-013; Env. Log No. PDS2014-ER-14-09-003* (May 2015). The Native American Heritage Commission (NAHC) was contacted and the NAHC failed to identify the presence of Native American sacred places/site in the immediate project area. The list of Native American groups provided by the NAHC were contacted which resulted in responses from the Ewiiapaayp, Santa Ysabel, and Viejas. Both the Ewiiapaayp and Santa Ysabel had no concerns. The Viejas Tribal Historic Preservation Officer identified that the Ramona area is rich in cultural resources and if of importance to the people of Viejas. Archaeological monitoring will be made a requirement of project approval due to the potential for undiscovered buried resources.

c) Directly or indirectly destroy a unique geologic feature?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> 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 site does not contain any unique geologic features that have been listed in the County’s Guidelines for Determining Significance for Unique Geology Resources nor does the site 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?

- | | |
|--|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input checked="" type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant With Mitigation Incorporated: A review of the County’s Paleontological Resources Maps and data on San Diego County’s geologic formations indicates that the project is located on geological formations that potentially contain unique paleontological resources. Excavating into undisturbed ground beneath the soil horizons may cause a significant impact if unique paleontological resources are encountered. Since an impact to paleontological resources does not typically occur until the resource is disturbed, monitoring during excavation is the essential measure to mitigate potentially significant impacts to unique paleontological resources to a level below significance.

The project has low potential for containing paleontological resources and will excavate the substratum and/or bedrock below the soil horizons.

A monitoring program implemented by the excavation/grading contractor will be required. Equipment operators and others involved in the excavation should 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, the County’s Permit Compliance Coordinator shall be notified, and a Qualified Paleontologist shall be retained by the 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 & Development Services Director:

- 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 & 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 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?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: Based on an analysis of records and a survey of the property by a County of San Diego approved archaeologist, Mary Robbins-Wade, it has been determined that the project

will not disturb any human remains because the project site does not include a formal cemetery or any archaeological resources that might contain interred human remains. The results of the survey are provided in an archaeological survey report entitled, *Cultural Resources Inventory: Independent Energy Solutions, Inc. (IES)/San Diego Gas & electric (SDG&E) Solar Energy project – Ramona, San Diego County, California, PDS2014-MUP-14-013; Env. Log No. PDS2014-ER-14-09-003* (May 2015). Archaeological monitoring will be made a requirement of project approval due to the potential for undiscovered buried resources.

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.

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The project is 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 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.

- ii. Strong seismic ground shaking?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant Impact: 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
- Less Than Significant With Mitigation Incorporated
- Less than Significant Impact
- No Impact

Discussion/Explanation:

Less Than Significant With Mitigation Incorporated: The project site is located within a "Potential Liquefaction Area" as identified in the County Guidelines for Determining Significance for Geologic Hazards. Feasible foundation designs exist that can mitigate the liquefaction hazard (including liquefaction-induced lateral spreading). Prior to issuance of building permits, a geotechnical study shall be reviewed and approved which specifies foundation design adequate to preclude substantial damage to the proposed structure due to liquefaction. With a site-specific engineering design, impacts due to liquefaction would be less than significant.

iv. Landslides?

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

Discussion/Explanation:

Less Than Significant Impact: The project site is 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 With Mitigation Incorporated
- Less than Significant Impact
- No Impact

Discussion/Explanation:

Less Than Significant Impact: According to the Soil Survey of San Diego County, the soils on-site are identified as Clayey alluvial land, Fallbrook sandy loam, 5 to 9 percent slopes and Placentia sandy loam, 2 to 9 percent slopes that have a soil erodibility rating of “moderate” and “severe” 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. However, the project will not result in substantial soil erosion or the loss of topsoil for the following reasons:

- The project will not result in unprotected erodible soils; will not alter existing drainage patterns; is not located in a floodplain, wetland, or significant drainage feature; and will not develop steep slopes.
- The project has prepared a Storm water Management Plan dated May 12, 2015, prepared by Linda Strand. The plan includes the following Best Management Practices to ensure sediment does not erode from the project site: Hydraulic Stabilization, County Standard Lot Perimeter Protection Detail, Silt Fencing, Fiber Rolls, Stabilized Construction Entrance, Street Sweeping and Vacuuming, Materials Management, Spill Prevention and Control, Waste Management, Solid Waste Management, Sanitary Waste Management, Hazardous Waste Management, Implementation of Efficient Irrigation Systems, Protection of Channel Banks/Manufactured Slopes, and Flat Pad Area Coverage.
- The project involves grading. However, the project is required to comply with 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). Compliance with these regulations minimizes the potential for water and wind erosion.

Due to these factors, it has been found that the project will not result in substantial soil erosion or the loss of topsoil on a project level.

In addition, 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.

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?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant Impact: The proposed project involves 2,608 cubic yards of 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 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?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant Impact: The project is located on expansive soils as defined within Table 18-1-B of the Uniform Building Code (1994). This was confirmed by staff 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. The soils on-site are Clayey alluvial land, Fallbrook sandy loam, 5 to 9 percent slopes and Placentia sandy loam, 2 to 9 percent slopes. However the project will not have any significant impacts because the project is required to comply the improvement requirements identified in the 1997 Uniform Building Code, Division III – Design Standard for Design of Slab-On-Ground Foundations to Resist the Effects of Expansive Soils and Compressible Soils, which ensure suitable structure safety in areas with expansive soils. Therefore, these soils will not create substantial risks to life or property.

e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The project is for a solar project . The project does not propose any septic tanks or alternative wastewater disposal systems since no wastewater will be generated.

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

Discussion/Explanation:

Less Than Significant Impact: Greenhouse Gas (GHG) Emissions 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, hydrofluorocarbons (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 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.

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 the region’s 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

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.

through development patterns, transportation infrastructure investments, and/or transportation measures or policies that are determined to be feasible.

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 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.

The San Diego County Recommended Approach for Addressing Climate Change in CEQA documents provides guidance for conducting greenhouse gas (GHG) and climate change analyses. San Diego County has adopted a screening level of 900 metric tons of CO₂e/year for which a project would require additional analysis and mitigation. Projects that fall below the 900 MT CO₂e/year screening level are not expected to result in a cumulatively considerable impact and no further analysis or mitigation would be required. It should be noted that the screening level assumes that the project does not involve unusually extensive construction activities and does not involve operational characteristics that would generate unusually high GHG emissions. Therefore, the determination of the need for a climate change analysis must consider project specific details that could contribute to a climate change impact.

The project would result in GHG emissions during construction (i.e., from the use of off-road equipment and construction vehicle use) as well as emissions from operational use associated with maintenance vehicles and indirect sources such as electricity demand from water used to clean and maintain the PV system.

GHG emissions associated with construction were quantified and amortized over 20 years, per San Diego County guidance. The amortized GHG emissions were combined with the estimated GHG emissions associated with operational maintenance vehicles and electricity use. The total annual GHG emissions associated with the project are shown below (see Air Quality Assessment dated May 13, 2015 for modeling inputs and outputs).

Emission Source	CO ₂ e ¹
	MT/year
Construction (20 years amortized)	8.6
Water Use	0.01
Maintenance Vehicles	6.2
Total Project GHG Emissions	15

1: CO₂e = Carbon dioxide equivalent

As shown above, total GHG emissions associated with implementation of the project would be substantially below the San Diego County screening level of 900 MT CO₂e/year. In addition, construction activities would be relatively short in duration (i.e., 115 days) and would be relatively minor, such as some site grading, PV installation, and application of aggregate to unpaved roads. Operations would be limited to annual maintenance and cleaning of the PV systems which would generate some emissions associated with vehicle use. However, these activities would be relatively minor and would not result in substantial GHG emissions (i.e., approximately 15 MT CO₂e/year).

Project GHG impacts would not be cumulatively considerable. Therefore, it is determined that the project would result in less than cumulatively considerable impacts associated with GHG emissions and no mitigation is required.

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 Impact
- Less Than Significant With Mitigation Incorporated
- No Impact

Discussion/Explanation:

Less Than Significant Impact: As described above, the project would not result in a cumulatively considerable contribution to global climate change. As such, the project would be consistent with County goals and policies included in the County General Plan that address greenhouse gas reductions. Therefore, the project would be consistent with emissions reduction targets of Assembly Bill 32, the Global Warming Solutions Act. Thus, the project would not conflict with any applicable plan, policy or regulation adopted for the purpose of reducing emissions of greenhouse gas emissions.

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 Incorporated
- No Impact

Discussion/Explanation:

Less Than Significant Impact: The project proposes a solar energy site which involves the routine use and storage of hazardous materials. However, the project will not result in a significant hazard to the public or environment because all storage, handling, transport, emission and disposal of hazardous substances will be in full compliance with local, State, and Federal regulations. California Government Code § 65850.2 requires that no final certificate of occupancy or its substantial equivalent be issued unless there is verification that the owner or authorized agent has met, or is meeting, the applicable requirements of the Health and Safety Code, Division 20, Chapter 6.95, Article 2, Section 25500-25520.

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

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

Discussion/Explanation:

No Impact: Based on a site visit and regulatory database search, the project site has not been subject to a release of hazardous substances. The project site is not included in any of the following lists or databases: the State of California Hazardous Waste and Substances sites list compiled pursuant to Government Code Section 65962.5., the San Diego County Hazardous Materials Establishment database, the San Diego County DEH Site Assessment and Mitigation (SAM) Case Listing, the Department of Toxic Substances Control (DTSC) Site Mitigation and Brownfields Reuse Program Database (“CalSites” Envirostor Database), the Resource Conservation and Recovery Information System (RCRIS) listing, the EPA’s Superfund CERCLIS database or the EPA’s National Priorities List (NPL). Additionally, the project does not propose structures for human occupancy or significant linear excavation within 1,000 feet of an open, abandoned, or closed landfill, is not located on or within 250 feet of the boundary of a parcel identified as containing burn ash (from the historic burning of trash), is not on or within 1,000 feet of a Formerly Used Defense Site (FUDS), does not contain a leaking Underground Storage Tank, and is not located on a site with the potential for contamination from historic uses such as intensive agriculture, industrial uses, a gas station or vehicle repair shop. Therefore, the project would not create a significant hazard to the public or environment.

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 With Mitigation Incorporated
- Less than Significant Impact
- No Impact

Discussion/Explanation:

No Impact: The proposed project is not located within an Airport Land Use Compatibility Plan (ALUCP), an Airport Influence Area, or a Federal Aviation Administration Height Notification Surface. Also, 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. 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 With Mitigation Incorporated
- Less than Significant Impact
- No Impact

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.

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

- Potentially Significant Impact
- Less Than Significant With Mitigation Incorporated
- Less than Significant Impact
- 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 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 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 project is not located along the coastal zone or coastline.

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 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 project is not located within a dam inundation zone.

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 Incorporated
- No Impact

Discussion/Explanation:

Less Than Significant Impact: The proposed project is adjacent to wildlands that have the potential to support wildland fires. However, 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 16 Fire Protection Districts in San Diego County. Implementation of these fire safety standards will occur during the building permit process. Also, a Fire Service Availability Letter, dated February 19, 2014, has been received from the Ramona Fire Department. The Fire Service Availability Letter indicates the expected

emergency travel time to the project site to be 5 minutes. The Maximum Travel Time allowed pursuant to the Safety Element is 10 minutes. Therefore, based on the review of the project by County staff, 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 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 With Mitigation Incorporated
- Less than Significant Impact
- 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. 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
- Less Than Significant With Mitigation Incorporated
- Less than Significant Impact
- No Impact

Discussion/Explanation:

Less Than Significant Impact: The project proposes photovoltaic solar facility which requires NPDES permits for discharges of storm water associated with construction activities. The project applicant has provided a copy of Minor Stormwater Management Plan (SWMP) which demonstrates that the project will comply with all current requirements. The project site proposes and will be required to implement the site design measures and/or source control BMPs and/or treatment control BMPs to reduce potential pollutants to the maximum extent practicable. These measures will enable the 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).

Finally, the 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 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 With Mitigation Incorporated
- Less than Significant Impact
- No Impact

Discussion/Explanation:

No Impact: The project lies in the Ramona hydrologic subarea, within the San Dieguito hydrologic unit. The project does not propose any known sources of pollutants, or land use activities that might contribute these pollutants.

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

Discussion/Explanation:

No Impact: The project does not propose any known sources of polluted runoff. In addition the project does not propose new storm water drainage facilities, nor does the project site contain natural drainage features that would transport runoff offsite.

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)?

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

Discussion/Explanation:

Less Than Significant Impact: The project will obtain its water from water from on-site groundwater wells for water uses associated with temporary construction and grading, and

long-term water demand for solar panel cleaning and landscape irrigation. SDG&E has a separate solar project (Pala SDG&E Solar Facility, PDS Project ID: PDS2014-AD-14-025, Env. Log No: PDS2014-ER-14-02-005) that is proposing to obtain water from this project's groundwater wells. This project when combined with the Pala SDG&E facility is estimated to require a one-time 1.4 acre-feet for temporary construction demand, and a long-term ongoing water demand of 0.4 acre-feet per year. Historically, the site has been used as a palm nursery for the past 13 to 16 years and is estimated to be have used approximately 15.1 acre-feet of groundwater per year. The nursery will be removed upon project commencement which will result in a substantial reduction in groundwater use at the site. The one-time construction demand of the combined projects during the first year is less than 10 percent of the existing conditions palm grove groundwater use. The long-term ongoing groundwater demand of the combined projects is only slightly more than 2 percent of the existing conditions palm grove groundwater use. Given the parcel size of 37.23 acres and the nominal long-term use of 0.4 acre-feet per year (an ongoing rate of 0.25 gallons per minute), there would be adequate groundwater resources available to serve the project without interfering substantially with the production rate of nearby wells. Therefore, the project will have sufficient water supplies available to serve the project.

- 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?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The project does not involve construction of new or expanded development that could alter the 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. The proposed project will not alter the existing natural topography, vegetation, or drainage courses on-site or off-site.

- 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?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant Impact: The proposed project will not significantly alter established drainage patterns or significantly increase the amount of runoff for the following reasons, based on a Drainage Study prepared by BergerABAM on May 2015:

- Drainage will be conveyed to either natural drainage channels or approved drainage facilities.

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 project will not contribute to a cumulatively considerable alteration or a drainage pattern or increase in the rate or amount of runoff, because the project will substantially increase water surface elevation or runoff exiting the site, as detailed above.

g) Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant Impact: The project does not propose to create or contribute runoff water that would exceed the capacity of existing or planned storm water drainage systems.

h) Provide substantial additional sources of polluted runoff?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The project does not propose any known additional sources of polluted runoff. In addition, the project does not propose new storm water drainage facilities, nor does the project site contain natural drainage features that would transport runoff off-site.

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?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant: Drainage swale, which are mapped on a County Floodplain Map were identified on the project site. However, the project is not proposing to place structures with a potential for human occupation within these areas 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
- Less Than Significant With Mitigation Incorporated
- Less than Significant Impact
- No Impact

Discussion/Explanation:

Less Than Significant: The project site contains drainage swales, which are identified as being 100-year flood hazard areas. However, the project is not proposing to place structures, access roads or other improvements which will impede or redirect flood flows in these areas.

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

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

Discussion/Explanation:

No Impact: The project site lies outside any identified special flood hazard area. Therefore, the project will not expose people to a significant risk of loss, injury or death involving flooding.

l) 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 With Mitigation Incorporated
- Less than Significant Impact
- 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?

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

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. Also, PDS Staff Michael Johnson has determined that 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?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The project does not propose the introduction of new infrastructure such major roadways or water supply systems, or utilities to the area. Therefore, the proposed 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?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant Impact: The proposed project is subject to the Public/Semi-Public Facilities (P/SP) General Plan Land Use Designation. The project is also subject to the policies of the Ramona Community Plan. The property is zoned A70 which permits solar facilities which are less than 10 acres with an Administrative Permit pursuant to the Zoning Ordinance Section 6954. The project is consistent with the D2 and F Special Area Regulations because the project avoids the floodplain. The project is a solar project and it is consistent with the General Plan because one of the many strategies identified in the County’s General Plan for Global Climate Change is to increase the generation and use of renewable energy sources as indicated in Chapter 1 of the General Plan. More specifically, COS Policy 14.4 Sustainable Technology and Projects, states: *Require technologies and projects that contribute to the conservation of resources in a sustainable manner, that are compatible with community character, and that increase the self-sufficiency of individual communities, residents and businesses.* Additionally, COS Policy 14.7 Alternative Energy Sources for Development Projects, states: *Encourage development projects that use energy recovery, photovoltaic, and wind energy.* The proposed project is also consistent with the policies of the Ramona Community Plan. Policy LU 5.1.2 states provide natural landscaping and/or other appropriate screening around structures. Therefore, the proposed photovoltaic solar facility is consistent with plan and zone.

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?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant Impact: The project site has been 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 of “Potential Mineral Resource Significance” (MRZ-3). However, the project site is surrounded by densely developed land uses including residential and equestrian uses which are incompatible to future extraction of mineral resources on the project site. A future mining operation at the project site would likely create a significant impact to 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.

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?

- | | |
|---|---|
| <input type="checkbox"/> Potentially Significant Impact | <input type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input checked="" type="checkbox"/> No Impact |

Discussion/Explanation:

No Impact: The project site is not located in an area that has MRZ-2 designated lands or is located within 1,300 feet of such lands. Therefore, the proposed project would not result in the loss of availability of locally important mineral resource(s).

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?

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

Discussion/Explanation:

Less Than Significant With Mitigation Incorporated: The project is a Solar Energy Project in Ramona. Primary permanent noise sources consists of transformers/inverters and panel washing. Incorporation of the noise measures would ensure that the project would not expose people to potentially significant noise levels that exceed the allowable limits of the County of San Diego General Plan, County of San Diego Noise Ordinance, and other applicable standards for the following reasons:

General Plan – Noise Element

The County of San Diego General Plan, Noise Element, Policy 4b addresses noise sensitive areas and requires an acoustical study to be prepared for any use that may expose noise sensitive area to noise in excess of a Community Noise Equivalent Level (CNEL) of 60 decibels (dBA). Moreover, if the project is excess of CNEL 60 dB(A), modifications must be made to project to reduce noise levels. Noise sensitive areas include residences, hospitals, schools, libraries or a similar facility where quiet is an important attribute. Based on a Noise Analysis prepared by LDN and dated May 13, 2015, project implementation will not expose existing or planned noise sensitive areas to road, airport, heliport, railroad, industrial or other noise in excess of the CNEL 60 dB(A). Therefore, the 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

The project is a Solar Energy Project in Ramona. Primary permanent noise sources consists of transformers/inverters and panel washing. The project and surrounding land uses are zoned A70 which is subject to the most restrictive one hour average sound level limit of 45 dBA at the project property lines pursuant to Section 36.404. The proposed layout of the equipment is on the western and southern portions of the site. The remainder of the site is the 100 year flood plain that traverses the property. The floodplain boundary is considered not a part of the project. The worst case property line noise levels have been evaluated and are located along the western and southern property lines. The nearest transformer and inverter stations are located approximately 500 feet from the project property lines and would produce an anticipated combine noise level 40.5 dBA which is below the 45 dBA requirement. Panel washing was also assessed and is anticipated to occur less than four times a year between the

hours of 7 a.m. and 10 p.m. Washing operations would take approximately four weeks to complete with washing patterns moving farther away from the property lines. It is recommended to establish a minimum distance of 65 feet from any residential property line. Due to the infrequency of washing activities and noise attenuation by distance, staff does not anticipate noise levels to exceed County noise standards. Based on the Noise Analysis and noise measures, the project would not exceed County Noise Standards.

Noise Ordinance – Section 36.409

Based on a Noise Analysis prepared by LDN Consulting dated May 13, 2015, 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.

Temporary construction equipment was evaluated to demonstrate noise ordinance compliance. Grading operations may utilize loaders/backhoes dozers graders trenchers and water trucks. The equipment is anticipated to be spread out over the site. Some equipment could potentially operate at or near the property line while the rest of the equipment may be located more than 600 feet away from the same property line. This would result in an acoustical center for the grading operations at approximately 300 feet from the nearest property lines. Based on a worst case scenario with all equipment operating at the same time in one same location, construction noise levels would generate approximately 73.9 dBA at this setback. Due to spatial separation of the equipment and an eight hour average requirement of 75 dBA, staff does not anticipate temporary construction noise levels to exceed the County noise standards. Additionally, no off-site roadway improvements are proposed as part of this project with the exemption to the driveway entrance and a pathway along Creelman Lane. Therefore, temporary grading operations are not anticipated to exceed the 75 dBA requirement pursuant to Section 36.409. Impulsive type of heavy equipment is regulated within Section 36.410 (82 dBA limit). Project temporary impulsive sources include a hydraulic breaker, mobile crane and pneumatic tools. The primary impulsive noise source is considered the breaker for a worst-case assessment. The breaker would generate a maximum sound pressure level of 86 dBA at 33 feet. This would equate to 82 at 50 feet. All photo voltaic panels would be located 50 feet or more from the nearest property lines. No impulsive noise impacts are anticipated and the project would comply with the impulsive 82 dBA requirement. Therefore, incorporation of noise attenuation by distance, establishing setbacks, and limiting operations would ensure that permanent and temporary noise sources would comply with County noise standards.

Finally, the project's conformance to the County of San Diego General Plan and County of San Diego Noise Ordinance (Section 36.404 and 36.409) ensures the project will not create cumulatively considerable noise impacts, because the project will not exceed the local noise standards for noise sensitive 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 With Mitigation Incorporated
- Less than Significant Impact
- No Impact

Discussion/Explanation:

No Impact: The project does not propose any of the following land uses that can be impacted by groundborne vibration or groundborne noise levels.

1. Buildings where low ambient vibration is essential for interior operation, including research and manufacturing facilities with special vibration constraints.
2. Residences and buildings where people normally sleep including hotels, hospitals, residences and where low ambient vibration is preferred.
3. Civic and institutional land uses including schools, churches, libraries, other institutions, and quiet office where low ambient vibration is preferred.
4. Concert halls for symphonies or other special use facilities where low ambient vibration is preferred.

Also, the project does not propose any major, new or expanded infrastructure such as mass transit, highways or major roadways or intensive extractive industry that could generate excessive groundborne vibration or groundborne noise levels on-site or in the surrounding area.

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

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

Discussion/Explanation:

Less Than Significant Impact: The project involves the following permanent noise sources that may increase the ambient noise level: Mechanical equipment associated with the solar project primarily consisting of inverter/transformer stations and panel washing activities. 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 over existing ambient noise levels based on review of the project by County staff and a Noise Analysis prepared by LDN Consulting.

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 cumulative noise impacts over existing ambient noise levels. Refer to XVII. Mandatory Findings of Significance for a comprehensive list of the projects considered.

d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

- | | |
|---|--|
| <input type="checkbox"/> Potentially Significant Impact | <input checked="" type="checkbox"/> Less than Significant Impact |
| <input type="checkbox"/> Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> No Impact |

Discussion/Explanation:

Less Than Significant Impact: The 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 36.409. 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.

Temporary construction equipment was evaluated to demonstrate noise ordinance compliance. Grading operations may utilize loaders/backhoes dozers graders trenchers and water trucks. The equipment is anticipated to be spread out over the site. Some equipment could potentially operate at or near the property line while the rest of the equipment may be located more than 600 feet away from the same property line. This would result in an acoustical center for the grading operations at approximately 300 feet from the nearest property line which is considered an appropriate methodology to evaluate grading operations. Based on a worst case scenario with all equipment operating at the same time in one same location, construction noise levels would generate approximately 73.9 dBA at this setback. Due to spatial separation of the equipment and an eight hour average requirement of 75 dBA, staff does not anticipate temporary construction noise levels to exceed the County noise standards. Additionally, no off-site roadway improvements are proposed as part of this project with the exemption to the driveway entrance and a pathway along Creelman Lane. Therefore, temporary grading operations are not anticipated to exceed the 75 dBA requirement pursuant to Section 36.409. Impulsive type of heavy equipment is regulated within Section 36.410 (82 dBA limit). Project temporary impulsive sources include a hydraulic breaker, mobile crane and pneumatic tools. The primary impulsive noise source is considered the breaker for a worst-case assessment. The breaker would generate a maximum sound pressure level of 86 dBA at 33 feet. This would equate to 82 at 50 feet. All photo voltaic panels would be located 50 feet or more from the nearest property lines. No impulsive noise impacts are anticipated and the project would comply with the impulsive 82 dBA requirement. Therefore, incorporation of noise attenuation by distance, establishing setbacks, and limiting operations would ensure that temporary noise sources would comply with County noise standards. 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, would the project expose people residing or working in the project area to excessive noise levels?

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

Discussion/Explanation:

No Impact: The proposed project is not located within a Comprehensive Land Use Plan (CLUP) for airports or within 2 miles of a public airport or public use airport. Therefore, the project will not expose people residing or working in the project area to excessive airport-related noise levels.

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 With Mitigation Incorporated
- Less than Significant Impact
- 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.

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)?

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

Discussion/Explanation:

No Impact: The proposed project will not induce substantial population growth in an area because the project does not propose any physical or regulatory change that would remove a restriction to or encourage population growth in an area including, but limited to the following: new or extended infrastructure or public facilities; new commercial or industrial facilities; large-scale residential development; accelerated conversion of homes to commercial or multi-family use; or regulatory changes including General Plan amendments, specific plan amendments, zone reclassifications, sewer or water annexations; or LAFCO annexation actions.

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
- No Impact

Discussion/Explanation:

No Impact: The proposed project will not displace any existing housing since the site is currently 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 Incorporated
- No Impact

Discussion/Explanation:

No Impact: The proposed project will not displace a substantial number of people since the site is currently vacant.

XIV. PUBLIC SERVICES

a) Would the project 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:

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

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

Discussion/Explanation:

No Impact: Based on the service availability forms received for the project, the proposed project will not result in the need for significantly altered services or facilities. Service availability forms have been provided which indicate existing services are available to the project from the following: Ramona Fire Department and Water District. The project does not

involve the construction of new or physically altered governmental facilities including but not limited to fire protection facilities, sheriff facilities, schools, or parks in order to maintain acceptable service ratios, response times or other performance service ratios or objectives for any public services. Therefore, the project will not have an adverse physical effect on the environment because the project does not require new or significantly altered services or facilities to be constructed.

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 With Mitigation Incorporated
- Less than Significant Impact
- No Impact

Discussion/Explanation:

No Impact: The 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.

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?

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

Discussion/Explanation:

No Impact: The project does not include recreational facilities or require the construction or expansion of recreational facilities. Therefore, the construction or expansion of recreational facilities cannot have an adverse physical effect on the environment.

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 With Mitigation Incorporated
- Less than Significant Impact
- No Impact

Discussion/Explanation: The County of San Diego Guidelines for Determining Significance for Traffic and Transportation (Guidelines) establish measures of effectiveness for the performance of the circulation system. These Guidelines incorporate standards from the County of San Diego Public Road Standards and Mobility Element, the County of San Diego Transportation Impact Fee Program and the Congestion Management Program.

Less Than Significant: The proposed project will result in an additional 2 ADT. However, the project will not have a direct impact related to a conflict with any performance measures establishing measures of effectiveness of the circulation system because the project trips do not exceed any of the County's Guidelines for Determining Significance for direct impacts related to Traffic and Transportation. As identified in the County's Guidelines for Determining Significance for Traffic and Transportation, the project trips would not result in a substantial increase in the number of vehicle trips, volume of capacity ratio on roads, or congestion at intersections in relation to existing conditions. In addition, the project would not conflict with policies related to non-motorized travel such as mass transit, pedestrian or bicycle facilities. Therefore, the project would not have a direct impact related to a conflict with policies establishing measures of the effectiveness for the performance of the circulation system.

The proposed project generates 2 ADT. These trips will be distributed on Mobility Element roadways in the County some of which currently or are projected to operate at inadequate levels of service. 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 TIF program creates a mechanism to proportionally fund improvements to roadways necessary to mitigate potential cumulative impacts caused by traffic from future development. These new projects were based on SANDAG regional growth and land use forecasts, the SANDAG Regional Transportation Model was utilized to analyze projected build-out (year 2030) development conditions on the existing Mobility Element roadway network throughout the unincorporated area of the County. Based on the results of the traffic modeling, funding necessary to construct transportation facilities that will mitigate cumulative impacts from new development was identified. Existing roadway deficiencies will be corrected through improvement projects funded by other public funding sources, such as TransNet, gas tax, and grants. Potential cumulative impacts to the region's freeways have been addressed in SANDAG's Regional Transportation Plan (RTP). This plan, which considers freeway buildout over the next 30 years, will use funds from TransNet, State, and Federal funding to improve freeways to projected level of service objectives in the RTP.

These project trips therefore contribute to a potential significant cumulative impact and mitigation is required. The potential growth represented by this project was included in the growth projections upon which the TIF program is based. By ensuring TIF funds are spend 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, which will be required at issuance of building permits, in combination with other components of the program described above, will mitigate potential cumulative traffic impacts to less than significant.

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 Impact
- 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 Impact: The project proposes an increase of 2 ADT. The additional 2 ADT from the proposed project do not exceed the 2400 trips (or 200 peak hour trips) required for study under the region’s Congestion Management Program. Additionally, the project does not involve construction of any new buildings, nor does it propose a new primary use. The additional access or support structures will not generate ADTs on a daily basis. Therefore the project will not conflict with travel demand measures or other standards of the congestion management agency.

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:

No Impact: The proposed project is located outside of an Airport Influence Area and is not located within two miles of a public or public use airport; therefore, the project will not result in a change in air traffic patterns.

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 With Mitigation Incorporated
- Less than Significant Impact
- No Impact

Discussion/Explanation:

No Impact: The proposed project will not alter traffic patterns, roadway design, place incompatible uses (e.g., farm equipment) on existing roadways, or create or place curves, slopes or walls which impedes adequate site distance on a road.

e) Result in inadequate emergency access?

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

Discussion/Explanation:

No Impact: The proposed project will not result in inadequate emergency access. The project is not served by a dead-end road that exceeds the maximum cumulative length permitted by the San Diego County Consolidated Fire Code, therefore, the project has adequate emergency access. Additionally, roads used to access the proposed project site are up 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 With Mitigation Incorporated
- Less than Significant Impact
- No Impact

Discussion/Explanation:

Less Than Significant: The proposed project is a Major Use Permit for the construction, operation, and maintenance of a photovoltaic solar facility and will generate 2 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.

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 Incorporated
- Less than Significant Impact
- No Impact

Discussion/Explanation:

No Impact: The project does not involve any uses that will discharge any wastewater to sanitary sewer or on-site wastewater systems (septic). Therefore, the project will not exceed any wastewater treatment requirements.

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

Discussion/Explanation:

No Impact: The project does not include new or expanded water or wastewater treatment facilities. In addition, the project does not require the construction or expansion of water or wastewater treatment facilities. Therefore, the project will not require any construction of new or expanded facilities, which could cause significant environmental effects.

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 With Mitigation Incorporated
- Less than Significant Impact
- No Impact

Discussion/Explanation:

Less Than Significant Impact: The project involves new storm water drainage facilities/permanent BMPs. The new facilities include implementation of efficient irrigation system, designing the project to include a buffer zone for natural water bodies, protection of banks and natural slopes, and permanent landscaping/groundcover. Refer to the Minor Storm water Management Plan dated May 12, 2015 for more information. However, as outlined in this Environmental Analysis Form, the new facilities will not result in adverse physical effect on the environment.

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

Discussion/Explanation:

Less Than Significant Impact: The project will obtain water from on-site groundwater wells. The project will substantially reduce the amount of groundwater used at the project site. After the project’s implementation, the project would have an ongoing water use of 0.4 acre-feet per year which is slightly more than 2 percent of existing conditions water use estimated to be 15.1 acre-feet per year at the site. There are adequate groundwater resources are available to serve the project at this significantly reduced amount. 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?

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

Discussion/Explanation:

No Impact: The proposed project for a solar project and will not produce any wastewater; therefore, the project will not interfere with any wastewater treatment providers 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 Incorporated
- Less than Significant Impact
- No Impact

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.). 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.

g) Comply with federal, state, and local statutes and regulations related to solid waste?

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

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?

- | | | | |
|-------------------------------------|--|--------------------------|------------------------------|
| <input type="checkbox"/> | Potentially Significant Impact | <input type="checkbox"/> | Less than Significant Impact |
| <input checked="" type="checkbox"/> | Less Than Significant With Mitigation Incorporated | <input type="checkbox"/> | No Impact |

Discussion/Explanation:

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 project, particularly Biological and Cultural Resources. However, mitigation has been included that clearly reduces these effects to a level below significance. This mitigation includes purchasing 2.55 acres of offsite non-native grassland mitigation, biological monitoring during all grading, clearing, grubbing, trenching, and construction activities, requiring a final biological monitoring report, requiring temporary fencing, restricting clearing and construction activities during the breeding season of nesting birds, paleontological monitoring, and requiring a final paleontological letter or report. 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.

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)?

- 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	PERMIT/MAP NUMBER
Episcopal Diocese of San Diego	PDS2011-3381-85-048
Agha Coussaie TPM	PDS2006-3200-21043
Herold Trust TPM	PDS2006-3200-20703
Glae and Jean McDonald TPM	PDS2006-3710-06-0110
Joseph Zenovic TPM	PDS2014-TPM-21212
Sol Orchard	3300-11-029; PDS2014-MUP-11-029M2
Joe and Charott Johnson TPM	PDS2012-2240-21160
Cummings Ranch	3810-03-005, 3100-5344
Dekoven TPM	3200-21070
McDonald 1, 2	3800-09-005, 3100-5560
McCandless TM	3100-5564
Lutheran Church MUP	3300-08-017
Ramona Air Center	3100-5554, 3300-08-032, 3301-71-396-01
Downtown Ramona Wireless	3400-10-002

Less Than Significant with Mitigation Incorporated: 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 Agricultural Resources, Biological Resources, Cultural Resources, Geology, and Noise. However, mitigation has been included that clearly reduces these cumulative effects to a level below significance. This mitigation includes purchasing 2.55 acres of offsite non-native grassland mitigation, biological monitoring during all grading, clearing, grubbing, trenching, and construction activities, requiring a final biological monitoring report, requiring temporary fencing, restricting clearing and construction activities during the breeding season of nesting birds, paleontological

monitoring, requiring a final paleontological letter or report, requiring a geotechnical study to address liquefaction, requiring temporary construction noise control measures, requiring a transformer/inverter station setback of a minimum of 450 feet from the nearest property lines, requiring on-going sound level compliance for project activities, require that 5.41 acres of Purchase of Agricultural Conservation Easement (PACE) mitigation credits be purchased or an agricultural open space easement be granted, and to require that the applicant maintain the viability of the on-site agricultural soils. 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?

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

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, VI. Geology and Soils, VIII. Hazards and Hazardous Materials, IX Hydrology and Water Quality XII. Noise, XIII. Population and Housing, and XVI. Transportation and Traffic. As a result of this evaluation, there were determined to be potentially significant effects to human beings related to the following Geology and Noise. However, mitigation has been included that clearly reduces these effects to a level below significance. This mitigation includes requiring a geotechnical study to address liquefaction, requiring temporary construction noise control measures, requiring a transformer/inverter station setback of a minimum of 450 feet from the nearest property lines, and requiring on-going sound level compliance for project activities. 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.

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.

Agricultural Analysis – IES/SDG&E Solar Energy Project Ramona dated May 8, 2015, prepared by James Chagala of James Chagala and Associates

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