FINAL
ENVIRONMENTAL IMPACT REPORT

Cumming Ranch Project
3810 03-005 (SP), 3600 07-002 (R), 3100 5344 (TM),
3500 10-007 (STP), 3910 03-09-028 (ER)
SCH: 2004031136

January 30, 2013

Lead Agency:

County of San Diego
Department of Planning and Development Services
5510 Overland Avenue, Room 110
San Diego, California 92123

This Environmental Impact Report was certified by the

Board of Supervisors on Jan 30, 2013 (1)

(Decision-Making Body) (Date/Item Number)

MARK WARDLAW, Director
County of San Diego, Department of Planning and Development Services

INTRODUCTION
FINAL ENVIRONMENTAL IMPACT REPORT

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Background

A Draft Environmental Impact Report (DEIR) for the Cumming Ranch project (project) was circulated for public review. Several federal, state and local agencies, private organizations, and individuals submitted comment letters on the DEIR. A total of 39 comment letters and email comments were received by the County of San Diego (County), including 17 letters from agencies and organizations; 21 letters from individual citizens; and one form letter with 34 signatures. The County prepared responses to all comments received during the public review period, which are included in the Final EIR. After public review, the DEIR was changed or modified in several places; either in response to public comments received, or the project Applicant's or the County's desire to clarify a matter, or due to project modifications. Pursuant to State California Environmental Quality Act (CEQA) Guidelines Section 15088.5(a), the County is required to recirculate the DEIR if significant new information is added after public review of the DEIR, but before certification. New information added to a DEIR is not significant unless the DEIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse effect of the project or a feasible way to mitigate or avoid such an effect (including feasible alternatives) that the project's proponents have declined to implement. Recirculation is not required when the new information added to the document clarifies, amplifies or makes insignificant changes to the EIR.

The County of San Diego Board of Supervisors determined that the changes made to the DEIR following public review do not constitute "significant new information" and, therefore, recirculation of the DEIR was not required. The following provides an explanation of the modifications made to the DEIR.

Project Description Changes

1. <u>Lot Location Revisions</u>

Throughout Final EIR: In response to comments, the Tentative Map for the project has been revised to relocate Lot 109 to the south of Highland Valley Road, adjacent to Open Space Lot C. The relocation of this lot further increases preservation of habitat and increases the connectivity between Open Space Lots I and J. The relocation of Lot 109 increases the distance between the building pads of lots 108 and 110 along the loop road to approximately 1,000 feet. The lot relocation and Tentative Map revision has resulted in minor changes to the impact totals in

Chapter 1.0, Project Description (and Section 3.1 Biological Resources). These modified totals, as presented in the tables below, are incorporated throughout the Final EIR (all locations of the acreage updates are not specifically called out in this document). However, these modified totals do not constitute "significant new information." Additionally, figures in the EIR, which depict the new and old locations of Lot 109, now reflect the fact that the lot has been relocated per the Tentative Map revision. These figures include: Figure 1-3, 1-5, 1-6, 1-16, 3.1-1a and 3.1-1b.

Table 1-1
Development Summary Table

Project Component	Dwelling Units	Acreage	Average Lot Size	Density
AREA A				
Residential Lots	125	188.2	1.5	0.66
Internal Streets	0	24.3	NA	NA
HOA Lots	0	2.1	NA	NA
Open Space Lots	0	143.7	NA	NA
RMWD Lift Station Lot	0	0.4	NA	NA
Total Area A	**125**	**358.7**	**1.5**	**0.35**
AREA B	0	201.0	NA	NA
AREA C	0	113.1	NA	NA
OTHER				
Right-of-Way – SR 67	0	2.9	NA	NA
Right-of-Way – Highland Valley Road	0	6.9	NA	NA
TOTAL PROJECT AREA	**125**	**682.6**	**1.5**	**0.18**

Note: NA=Not Applicable

Table 1-2
Summary of Land Use Types and Totals

Land Use Type	Acreage	Percent of Project
Rural Residential	215.0	32%
Open Space	457.8	67%
Other (ROW)	9.8	1%
Project Total	**682.6**	**100%**

2. Vegetated Buffer between the Project and Vorhees Lane

Throughout Final EIR: In response to a comment from a local resident, the project has been modified to include a 20-foot buffer along the length of Voorhes Lane on Lots 120 through 125. The purpose of the buffer would be to maintain a vegetated area between Voorhes Lane and the adjoining lots to reduce potential sediment runoff. The project would also install a new fence along Voorhes Lane from the Hardy Ranch property to Open Space Lot H, continuous along the entire length with no openings or gates and also encompass the entire perimeter of Open Space Lot H for vernal pool protection. The only allowed uses within the buffer would be the establishment and maintenance of landscape, the perimeter fence, and the existing utility poles and anchor wires that provide service to the existing homes on Voorhes Lane.

3. Withdrawal of the GPA Application

Throughout Final EIR: The applicant withdrew the application for 3800 03-007 (GPA) because after the County General Plan was updated in August 2011, the project became consistent with the General Plan and Community Plan designations and policies. No General Plan Amendment is required for project approval.

4. Other Minor Project Description/Design Changes and Clarifications

A number of other minor changes and clarifications have been made throughout the Summary and Chapter 1.0, Project Description and Environmental Setting, in the Final EIR as outlined below. These changes reflect minor additions or clarifications, and do not involve "significant new information" (with related explanations and/or references to additional discussion in other portions of the Final EIR provided where appropriate).

a. *Summary*

- All minor changes to acreage, due to lot revisions as described above, have been made throughout the document in both text and tables.

- Changes to the title of two alternatives were made for clarity (the Clustered Development Alternative and the Former Community Plan Alternative). An explanation for the title of the General Plan Update Alternative was added (the alternative was developed prior to GP approval on August 2011). The project as proposed is consistent with the General Plan Update, as adopted.

- Text was added to clearly state, "LAFCO approval of an expansion of the RMWD latent sewer power area for the extension of sewer service to the proposed project area would be required." This necessary approval was discussed throughout the DEIR, but was not previously described in the summary section.

- Three items were added to the list of known areas of controversy. These items include, 1) timely water, sewer, and fire service availability to meet project demand, 2) potential impacts to the planned, orderly, and efficient patterns of development, and 3) maintenance of the integrity of agricultural lands.

- Table S-1 was modified to reflect minor wording changes made to impacts and mitigation measures.

b. *Chapter 1, Project Description and Environmental Setting*

- Text was added to clarify the planned improvement to culverts that cross under Highland Valley Road in the project area to accommodate wildlife movement.

- Text was added to clarify that all trail alignments have been defined in the FEIR and have been analyzed, and impacts have been mitigated. For the future trail in Area B, a resurvey of the alignment prior to approval of the final map is proposed if the project

engineer determines that the sewer alignment can be moved. The new survey would be used by the biologist and project engineer to recommend an adjustment to the trail/sewer alignment (20 feet wide) in Area B by not more than 100 feet to the south of the alignment shown on the tentative map. Changes to the alignment must reduce biological impacts by moving the alignment away from alkali marsh to agricultural land or by increasing the width of the wetland buffer along Santa Maria Creek. The new survey must be done by a County-approved biologist. The new survey and alignment recommendations must be completed before approval of the final map and be reviewed and approved by PDS (sewer) and DPR (trails). The Resource Manager under the RMP would locate the trails in the specified 20-foot wide alignment to further minimize biological impacts. Trails would be managed by the County Department of Parks and Recreation.

- Text was revised to clarify that the proposed staging area and associated trails will not be installed and are no longer a part of the project. Description was modified to state that the trail alignment in Area B will be established and right of way will be dedicated at final map to the County, but the trail may not be built, depending on the needs of the overall trail network in the area. This information is not significant because it does not involve a new substantial adverse effect of the project.

- Text was added to clarify that Cumming Ranch project would be responsible for reimbursement of operation and maintenance costs of the Resource Management Plan.

- Text was modified to clarify that the project requires RMWD to improve/upgrade its sewer and water facilities, to include implementation of the expansion of the SMWWTP because it, or a lesser improvement, will be needed for the project (this information was previously included in section 3.6).

- Text was added to state the project is not within RMWD's "activated" latent powers sewer service area, "but is within its Sphere of Influence". Text was also added to state that "Prior to LAFCO consideration of the latent power expansion, the applicant would be required to participate in the update of a Municipal Service Review per Government Code Section 56430." This information is for clarification purposes and does not change the analysis or conclusions within the EIR.

- Text was added to clarify that easement rights for utilities within the Hardy Ranch and other offsite locations may be assigned to Ramona Municipal Water District.

- Text was added describing the addition of a 20-foot buffer along the length of Vorhees Lanes on Lots 120 through 125 and the associated fencing and vegetated cover to provide additional separation. This information is not significant because it does not involve a new substantial adverse effect of the project.

- Text has been revised to clarify that the Homeowners Association, if established, would review proposals for large animal keeping.

- Description of project fencing has been modified to include the fence for separation between residential lots and Vorhees Lane, and to protect the vernal pool area within Open Space Lot H. This information is for clarification purposes and does not change the analysis or conclusions within the EIR.

- The description of the GPA has been removed with the explanation that the amendment is no longer necessary since the GP Update was adopted.

- Project implementation has been clarified to explain that there may be up to six phases, but all the mitigation will be tied to the first final map or the site plan.

- Text has been clarified to state that the County Trails Program "implements" the Community Trails Master Plan. In addition, the text has been changed to explain that the 2-acre staging area and associated trails in Area C have been deleted.

- What is meant by "consistency with the County General Plan Update" is explained.

- Discussion regarding LAFCO actions necessary for the project has been revised to state that "LAFCO approval of an expansion of the RMWD latent sewer power area to include the proposed project area is required" and to clarify that the project is within the existing water service area of the Ramona Municipal Water District. Additional detail has been added to indicate where LAFCO's areas of concern are discussed within the Final EIR.

- Table 1-5 has been reordered to more accurately reflect the chronological order of required approvals/permits.

- Table 1-7 has been corrected with the address for cumulative project #9.

Environmental Analysis Changes

The Final EIR includes a number of modifications to the analysis of environmental impacts in Chapters 2.0 (Significant Environmental Effects Which Can Not be Avoided if the Proposed Project is Implemented), 3.0 (Significant Environmental Effects of the Proposed Project Which Can be Mitigated) and 4.0 (Environmental Effects Found Not to be Significant). These changes are associated with comments received during public review of the DEIR, as well as several of the previously noted design modifications.

1. <u>Modifications to Chapter 2.0, Significant Environmental Effects Which Can Not be Avoided if the Proposed Project is Implemented</u>

a. *Subchapter 2.1, Transportation and Circulation*

- A discussion of the new Mobility Element of the General Plan with applicable plan-level mitigation was added.

- Text was added about the standard requirement for certain projects to obtain a County Traffic Control Permit and measures that are typically included. This information is not significant new information because it does not involve a new substantial adverse effect of the project.

- Mitigation measure M-TR-1 was revised to explain that mitigation is infeasible based on a lack of rough proportionality to the project's level of impact.

- Per Caltrans' request, the language, "and shall also be implemented to Caltrans' satisfaction" has been added to Mitigation Measure M-TR-1b.

- Per Caltrans' request, Mitigation Measure M-TR-7 has been modified to read, "…to the satisfaction of the County DPW and Caltrans".

- The rationale for mitigation measure M-TR-1a and M-TR-3a were revised to explain that these mitigation measures are infeasible based on a lack of rough proportionality between the project's impact and the required mitigation and because neither Poway nor Caltrans has a fair-share program in place to add the needed traffic lanes.

- Tables 2.1-3 and 5 were corrected to remove the intersection of SR67 at Mussey Grade Road. This correction was necessary due to an inadvertent error, as the project does not contribute traffic to the critical movements at that intersection. The information was correct in the technical report and in the DEIR text that was circulated for public review, but the table had not been updated.

- Table 2.1-4: The capacity was corrected for SR67 from Scripps-Poway Parkway to Archie Moore Road because these segments are 2-lane facilities. This was an inadvertent error. The information was correct in the technical report and in the EIR text that was circulated for public review.

- Table 2.1-4: The first row, the segment labeled "Poway Road to Archie Moore Road" was corrected to read, "Scripps-Poway Parkway to Archie Moore Road." This was an inadvertent error. The information was correct in the technical report that was circulated for public review. This change is not significant new information because it does not involve a new substantial adverse effect of the project.

2. <u>Modifications to Chapter 3.0, Significant Environmental Effects of the Proposed Project which can be Mitigated</u>

The following discussion includes changes in the Final EIR to Subchapters 3.1, Biological Resources; 3.2, Cultural Resources; 3.3, Noise; and 3.6, Public Services and Recreation.

a. *Subchapter 3.1, Biological Resources*

- Text was added to explain why focused surveys were not done in the past year and why the older surveys are sufficient to support the conclusions in the EIR.

- Information was added about the project's biological survey and mapping process, consistent with County-approved standards.

- Information about the location of the October 2010 Critical Habitat for spreading navarretia was added.

- Information about the absence of Quino checkerspot butterfly on the site and in Ramona was added.

- Text regarding the Stephens' kangaroo rat onsite habitat was added and states, "An evaluation of the potential for species occupation on the project site in 2010 concluded that suitable habitat no longer exists onsite (O'Farrell Biological Consulting 2010)."

- Description of 2011 habitat assessment and survey was added to white-tailed kite discussion. The report was added to the Final EIR as Appendix P. This information is not significant new information because it does not involve a new substantial adverse effect of the project.

- Description of 2011 habitat assessment and survey was added to the golden eagle discussion. The report was added to the Final EIR as Appendix P.

- Description of the Federal Endangered Species Act was modified to include the procedure for preconstruction surveys, consultation with the wildlife agencies, and avoidance measures that would be required in the case that arroyo toad or Stephens' kangaroo rat are present. This section also notes that no impacts to San Diego fairy shrimp or Quino checkerspot butterfly would result.

- A description of the Bald and Golden Eagle Protection Act of 1940 was added.

- Information was added about the project's biological impact analysis process, as required by the County Requirements and Guidelines of Significance.

- Lots A, B, C, D, E, F, and H have been identified as impact neutral lots. A description of each of these lots and why they are impact neutral has been included. A statement that these lots do not contribute to mitigation credits has also been added.

- A description of the County of San Diego Habitat Loss Permit Ordinance was added. An explanation of the findings regarding the project's consistency with the Habitat Loss Permit and Natural Communities Conservation Planning Act was added. Notation of the Agencies' support the project's preserve design, mitigation measures, and the required HLP findings was added (letter dated November 16, 2012). The applicant agreed to place an open space/conservation easement over the designated open space areas in Areas B and C, in addition to open space in Area A.

- A description of the County of San Diego Resource Protection Ordinance "sensitive habitat lands" was added. An explanation of the requirements for avoidance and mitigation under this ordinance was added.

- Additional detail and analysis regarding the watershed and potential for project runoff to impact the vernal pool located in Area A was added. An explanation why the vernal pool in Lot H Area A would not be adversely impacted by runoff. This information is not significant new information because it does not involve a new substantial adverse effect of the project.

- Clarification regarding the project's wetland impacts and analysis and that impacts have been fully mitigated has been added. The measure to further reduce the wetland impact from the trail in Area B is an adjustment from alkali marsh vegetation to agricultural land that must be evaluated by the project engineer and biologist in the field to determine if it is feasible has also been clarified.

- A description of the findings of the golden eagle and white-tailed kite survey and habitat assessment was added. The findings indicate that golden eagle and white-tailed kite foraging will not be significantly affected by the project, the project impact is not substantial and the project would not constitute a "take" of the species.

- Grasshopper sparrow and Bell's sage sparrow were added to the list of potentially impacted species. They were inadvertently omitted from this list, but are on the original species lists. Bald eagle was also added to the list due to the recent colonization of the species in the area.

- Discussion of potential impacts from the trail system to eagles and other raptors was added. A comparison of bald eagle foraging with golden eagle foraging was made to draw impact conclusions. New analysis found that installation and use of the trial system would not significantly impact eagle or other raptors. According to the eagle specialist, this conclusion would also apply to the single pair of bald eagles nesting for the first time in 2013 about 7400 feet away from the closest trail point.

- Text was modified to include a description of the proposed upgrades to culverts under Highland Valley Road to facilitate wildlife movement.

- Text was modified to include a description of the Santa Maria Creek and its distance from the proposed development footprint as it relates to wildlife movement and cumulative impacts.

- Specifics of the RMP as it relates to mitigation measure M-BI-1(b) were added for clarification.

- Text within Mitigation Measure M-BI-7 stating that CSS could not be fully mitigated onsite was removed as all CSS impacts will now be fully mitigated within the project site.

- Text in Mitigation Measure M-BI-12a (Revegetation Plan) was modified to include the Engelmann and coast live oaks.

- Mitigation Measure M-BI-15a was clarified to state that while arroyo toad is not present at this time, an arroyo toad biologist shall examine the impact areas to determine if any portions of the site may have been colonized in the interim and upon consultation with USFWS a protocol survey may be required. If the species is determined to be present, an FESA take permit will be required and will include breeding season restrictions and construction fencing, dedication of mitigation credits over suitable habitat in Area B, open space habitat enhancements, and/or endowment for conservation, as conditions of the FESA take permit.

- While not present at this time, Mitigation Measure M-BI-12b was clarified to state that a qualified Stephens' kangaroo rat biologist shall examine the impact areas to determine if any portions of the site may have been colonized and upon consultation with USFWS a protocol survey may be required. If the species are determined to be present, an FESA permit will be required and will include breeding season restrictions and construction fencing, dedication of mitigation credits over suitable habitat in Area B, open space habitat enhancements, and/or endowment for conservation, as conditions of the FESA take permit.

- Mitigation Measure M-BI-15c was clarified for burrowing owl and other raptors at the request of the wildlife agencies to include breeding season restrictions and, if the owl is present, to require implementation of passive relocation measures in accordance with CDFG Staff Report (CDFG 2012) and wildlife agency concurrence.

- Arroyo southwestern toad, bald eagle, grasshopper sparrow, and Bell's sage sparrow were added to Table 3.1-4. This table was also modified to note that Cooper's hawk and bald eagle "have" been observed "within" the project site.

- Table 3.1-5 was modified to show corrected impact and mitigation acreages based on lot revisions.

- Table 3.1-9 was modified to show corrected impact and mitigation acreages and location of mitigation based on lot revisions.

b. *Subchapter 3.2, Cultural Resources*

- Text was added to note that regulatory guidelines for cultural resources are detailed in the Cultural Resources Evaluation included as Appendix E.

- Additional analysis was added to support the conclusion that sites CA-SDi-17,192 and 17,183 do not constitute significant resources.

- The number of residential lots for the Cumming Ranch project as listed in Table 3.2-3 was revised to accurately state the proposed 125 lots.

c. *Subchapter 3.3, Noise*

- The adoption of the General Plan Update and the Noise Element resulted in a change in the significance threshold for noise. The new threshold is 60 dBA CNEL for traffic noise and land use compatibility. Since the project met the previous 55 dBA CNEL with mitigation, the project will also meet the new threshold. No change to mitigation measures were required, except to change the term "noise protection easement" to "noise restriction easement" in accordance with the new Noise Element.

- Mitigation Measure M-N-4 was revised to state that construction restrictions shall begin on January 15 instead of February 1 in consideration of sensitive avian species.

- Tables in Section 3.3 were modified to conform with the General Plan Update.

d. *Subchapter 3.4, Aesthetic and Visual Quality*

- Information about the Zone B of the County Light Pollution Code was added.

e. *Subchapter 3.6, Public Services and Recreation*

- Text was added to provide additional details regarding the fire stations that serve the project area.

- Text was clarified to state that the project is "within the RMWD, but is not located within the RMWD latent sewer power area. LAFCO approval of an expansion of the RMWD latent sewer power area to include the proposed project area is required before the project can receive sewer service from RMWD."

- Text was revised to accurately state that solid waste would be disposed of at the Sycamore Landfill, rather than the Ramona Landfill. Detail regarding capacity of the Sycamore Landfill was also added.

- Discussion was added regarding the Project Facility Availability Form that was received for fire protection services and the conditions required by that letter. This Project Availability Form was added to the list of references.

- Mitigation Measures M-PS-2, 3, 5, and 6 were expanded to state that County approval of the Final map for the Cumming Ranch project "shall not occur until after RMWD has provided a commitment to serve…"

- Table 3.6-3 was expanded to include the total annual water demand for the project of 78 acre feet per year.

3. <u>Modifications to Chapter 4.0, Environmental Effects Found Not to be Significant</u>

The following discussion includes changes in the Final EIR to Sections 4.1.3, Agricultural Resources and 4.1.4, Land Use and Planning.

a. *Section 4.1.3, Agricultural Resources*

- Text was added to note that agricultural polices as adopted by LAFCO are addressed in this section.

- Applicable LAFCO agricultural policies were added to the Regulations and Policies section. LAFCO policies added to this section include Government Code Section 56377, San Diego LAFCO Policy L-101, and Government Code Section 56064.

- A discussion and analysis of the project's consistency with applicable LAFCO agricultural policies was added. New discussion outlines the prime farmland within the project site and explains that developing the farmland would be in accordance with LAFCO policies. The analysis of LAFCO agricultural policies did not change the significance findings of the document.

b. *Section 4.1.4, Land Use and Planning*

- Minor wording revisions were made to clarify the purpose of the Land Use and Planning section.

- The sentence, "These residences abut the project site and are generally 2 to 5 acres in size" was removed for the purpose of adding more detailed and accurate descriptions of the surrounding residential lots.

- Text was added to supplement the discussion of surrounding land uses and compatibility with existing residential development. Assessor Parcel information was reviewed to provide additional detail stating, "existing residential lots within 300 feet of the project boundary range in size from 0.55 acres to 14.82 acres. The average lot size is 3.24 acres and the existing density is 0.31 du/acre." Additional information was provided to describe residential lot sizes specific to each area surrounding the project site.

- Additional text was added to provide greater detail regarding features of the Cumming Ranch residential design that provide consistency with the community character of Ramona. Design features described include an average residential lot size of 1.5 acres, 8 large open space lots throughout the residential development area, no street lighting, animal keeping, agricultural uses, and preservation of nature features.

4. <u>Modifications to Chapter 5.0, Project Alternatives</u>

The following discussion includes changes in the Final EIR to Section 5.2.1, No Build Alternative; Section 5.4.2, the Clustered Development Alternative; Section 5.5.2, the Reduced Project Alternative; and Section 5.6.2, the General plan Update Alternative. The result is that, other than the No Project Alternative (No Build), the Reduced Project Alternative is environmentally preferred, and no change to the FEIR conclusion was required.

- Information was added to the No Build Alternative to indicate that the land would be available to be added to the Ramona Grasslands Preserve. However, the project is

designated as RL-40 and SR-2, with S88 Zoning, and there would be no mechanism to require the project to become part of the Ramona Grasslands, nor is there evidence to support the notion that the land will become part of the Preserve. Text was modified to include a condition that this area would be encumbered by an open space easement that would protect the biological resources, while allowing continued use for farming to the extent it now occurs, until the property is acquired by the County, another governmental agency or a conservancy for conservation purposes.

- The section analyzing agriculture for the Clustered Development Alternative was expanded to state that there would be less farmland that would be converted to another use with the Clustered Alternative than if the project was implemented.

- The section analyzing public services for the Reduced Project Alternative was expanded to state that sewer would not be precluded but septic would be more likely because it would be more economical.

- The section analyzing hydrology and water quality for the General Plan Update Alternative was expanded to state that even with fewer homes and fewer impervious surfaces, added accessory buildings and bare dirt that could result from the GPU Alternative would have a similar effect related to hydrology and water quality compared to if the project was implemented.

5. Modifications to Other EIR Chapters

The following discussion includes changes in the Final EIR to Chapters 6, List of References and 8, List of Mitigation Measures and Environmental Design Considerations.

- The reference section was updated where necessary due to new or revised references used throughout the document.

- Table 8-1 was updated to reflect and be consistent with changes made to mitigation measures or project design features as detailed throughout the Final EIR.

LIST OF PERSONS, ORGANIZATIONS, AND PUBLIC AGENCIES THAT COMMENTED ON THE DRAFT EIR

A draft version of this EIR was circulated for public review from November 4, 2011 to December 20, 2011. The following is a listing of the persons, organizations, and public agencies that commented during this public review period.

Federal Agencies	**Letter**
United States Fish and Wildlife Service	A
State Agencies	**Letter**
California Department of Fish and Game	B
Caltrans District 11 Planning Division	C
Department of California Highway Patrol, El Cajon Area	D
Department of California Highway Patrol, Special Projects Section	E
State Clearinghouse and Planning Unit	F
County, City, and Other Local Agencies	**Letter**
Ramona Community Planning Group	G
Ramona Municipal Water District	H
San Diego Local Agency Formation Commission	I
Organizations	**Letter**
Conservation Biology Institute	J
Endangered Habitat League	K
Mussey Grade Road Alliance	L
The Nature Conservancy	M
California Native Plant Society, San Diego Chapter	N
San Diego County Archaeological Society	O
San Diego Mountain Biking Association	P
Wildlife Research Institute, Inc.	Q

Individuals	Letter
Amundson, Susan	R
Bell, Jerry & Edee	S
Berthiaume, Mike	T
Berthiaume, Shelly	U
Crook, Rick & Wanda	V
Guy, Carlo & Julia	W
Hilzman, Elfta	X
Jones, Charlotte	Y
Kirkpatrick, Darren & Michiyo	Z
Lachut, Paul	AA
Maurer, James	BB
Minervini, Jim	CC
Osborn, Vivian	DD
Rockwell, Dennis & Dawn	EE
Sage, Timothy	FF
Van Metre, Richard	GG
Vering, Lori	HH
Wilson, Regina	II
Wiseman, Patricia	JJ
Wiseman, Patricia	KK
Form Letter (34 signatures)	LL
Amundson, Susie	MM

RESPONSE TO COMMENTS

United States Department of the Interior

FISH AND WILDLIFE SERVICE
Ecological Services
Carlsbad Fish and Wildlife Office
6010 Hidden Valley Road, Suite 101
Carlsbad, California 92011

In Reply Refer To:
FWS-SDG-11B0097-11TA0153

DEC 17 2010

Mr. Larry Hofreiter
County of San Diego
Department of Planning and Land Use
5201 Ruffin Road, Suite B
San Diego, California 92123

Subject: Draft Environmental Impact Report and Habitat Loss Permit for the Cummings Ranch Project, San Diego County, California (GPA 03-007, SP 03-005, TM 5344, STP 10-007, REZ 07-002, Log No. 03-09-028, SCH No. 2004031136)

Dear Mr. Hofreiter:

The U.S. Fish and Wildlife Service (Service) has reviewed the draft environmental impact report (DEIR) and draft habitat loss permit (HLP) for the above-referenced project, dated November 4, 2010. The comments provided herein are based on the information provided in the DEIR and HLP, the Service's knowledge of sensitive and declining vegetative communities, and our participation in regional conservation planning efforts.

The proposed project involves a General Plan Amendment, Specific Plan Amendment, Site Plan, Rezone, and Tentative Map for a 682.6-acre parcel. The project site is located approximately 0.25 mile northwest of the intersection of State Route 67 and Highland Valley Road within the Ramona Community Planning Area. Access to the project site will be from four points on Highland Valley Road.

A-1

The project site is divided into three main areas (Areas A, B, and C). Area A consists of 358.7 acres, of which 215.4 acres will be developed into 125 residential lots and 143.3 acres will be designated as biological open space and will be used for the project's biological mitigation requirements. Area B consists of 201 acres that will be designated as open space. Following recordation of the final map, the owner will convey by sale 138.5 acres to the County of San Diego (County) or a conservancy acting on behalf of the Ramona Grasslands Preserve, for inclusion in the Ramona Grasslands Preserve. The remaining 62.5 acres of Area B will be used for the project's biological mitigation requirements. Area C consists of 113.1 acres that will be designated as biological open space. Following recordation of the final map, the owner will convey by donation Area C in fee title to the County or a conservancy acting on behalf of the Ramona Grasslands Preserve, for inclusion in the Ramona Grasslands Preserve. A 25.3-acre portion of Area C will be used for the project's biological mitigation requirements.

TAKE PRIDE IN AMERICA

Letter A
USFWS Responses

A-1
Comment A-1 is an introduction to the comment letter summarizing project elements as described in the Final EIR. No response is necessary.

In addition, 22.2 acres of Area C are within existing open space easements and are biological mitigation for unrelated projects. These 22.2 acres are known as the Ramona Vernal Pool Preserve.

A-2 Our review of draft habitat evaluation maps of the draft North County Multiple Species Conservation Plan (NCMSCP) indicates that native habitat on and off site is of "very high" to "high" habitat quality, and that the project site is located within a pre-approved mitigation area (PAMA). In addition, the project site contributes to an approximately 4,500-acre area, known as the Ramona Grasslands Preserve. The Ramona Grasslands Preserve represents a portion of the last remaining native grassland in the County and supports numerous federally listed species

A-3 including, but not limited to, the federally listed endangered arroyo toad (*Bufo californicus*; arroyo toad), Stephens' kangaroo rat (*Dipodomys stephensi*; SKR), San Diego fairy shrimp (*Branchinecta sandiegonensus*; fairy shrimp), federally listed threatened coastal California gnatcatcher (*Polioptila californica californica*; gnatcatcher), as well as sensitive species including mountain lion (*Felis concolor*), mule deer (*Odocoileus hemionus*), and the golden eagle (*Aquila chrysaetos*).

A-4 The applicant has met numerous times with the County and the Service to discuss/negotiate the proposed development/preserve design as part of the planning process for the County's draft NCMSCP. These discussions did not include details related to the proposed offsite road improvements or the internal trails plan.

We offer the following recommendations and comments to assist the County in minimizing and mitigating project impacts to biological resources, and to ensure that the project is consistent with ongoing regional habitat conservation planning efforts:

A-5 1. The DEIR/HLP states that the majority of project mitigation will be located within Area A. Area A contains nine open space lots (Lots A through J). The DEIR further states that due to their small size and isolated state, Lots C, E, and H are considered impact neutral and will not be considered as part of the onsite mitigation component of the project. We concur with this assessment. However, based on our review of the Conceptual Site Plan (Figure 1-5) we recommend that Lots A, B, D, and F also be considered impact neutral and not considered part of the onsite mitigation component due to their small size, susceptibility to edge effects, and isolation from the larger open space Lots I and J. All project mitigation requirements should be met within Lots I and J of Area A, Area B, Area C, or off site if adequate amounts of in-kind habitat are not available on site.

A-6 2. The DEIR/HLP states that only 62.5 acres of Area B are required to meet the project's mitigation requirements and that the remaining 138.5 acres of Area B will be conveyed by sale to the County or to a conservancy acting on behalf of the Ramona Grasslands Preserve for inclusion into the Ramona Grasslands Preserve. We acknowledge the high conservation value of the 138.5 acres of Area B and the importance of this area to the Ramona Grasslands and the draft NCMSCP PAMA. Provided that the County purchases

A-2
This comment provides a summary of the USFWS review of draft habitat evaluation maps for the proposed project. The comment does not address adequacy of the document under CEQA and no response is necessary.

A-3
The County concurs with the USFWS assessment of sensitive species supported by the grasslands and potentially by the project site. The Ramona Grasslands Preserve is discussed in detail in Section 1.1.3 of the Draft EIR and the Cumming Ranch project would make available a total of 457.4 acres of open space for inclusion in the Ramona Grasslands Preserve. Each species mentioned in Comment A-3 is discussed in the Final EIR. Discussion of the surveys performed and results for the arroyo toad, Stephen's kangaroo rat, San Diego fairy shrimp, and coastal California gnatcatcher are provided within Section 3.1.1 of the Final EIR. Section 3.1.1 of the Final EIR includes a discussion of potential mountain lion and mule deer presence in the area and on the project site. The golden eagle is also discussed in Section 3.1.1 and, since publication of the Draft EIR, additional surveys and habitat assessments for golden eagle and white-tailed kite have been conducted. Please see Response to Comment A-8 below for details regarding the recent golden eagle study.

A-4
Comment A-3 acknowledges the applicant's efforts to coordinate with the USFWS on the project. For the record, the NOP for the project that was circulated from March 25 to April 26, 2004, showed trails and the project description discussed the need for "improvement of roadways for access, including secondary and/or emergency access." In addition, the project had a Batching Meeting for NCCP compliance with the Wildlife Agencies on August 26, 2010, prior to the Draft EIR public review period, during which the full project description was discussed. The project revisions and trail alignments were discussed with the Wildlife Agencies on March 1, 2012. The County never intends to exclude any project components, such as offsite improvements or trails, and regrets that USFWS has this impression.

A-5
The County acknowledges the scientific basis for the comment that isolated open space lots within Area A are not suitable for mitigation over time due to factors such as smaller size, edge effects, and isolation. Please see revisions to the Final EIR that now label lots A, B, D, and F as impact neutral, as requested by USFWS. All mitigation for the project would now be accomplished in Open Space Lots G, I, and J of Area A, and within open space easements of Areas B and C. All mitigation is proposed in-kind and onsite. The County finds that Lots G, I, and J within Area A are of the appropriate size and quality, and provide important continuity with adjacent open space preserved in Area B; thus, the lots are adequate to provide quality mitigation acreage. As shown in Figure 1-5 of the

Final EIR, Lots G, I, and J of Area A are larger parcels that include the drainage and ridgeline adjacent to Area B and are considered adequate to provide quality habitat mitigation. These three lots combined are over 100 acres in size and are connected geographically. These lots have one wildlife movement constraint that is narrower than the 400-foot MSCP minimum for wildlife movement. This constraint is located between lots 108 and 88 and is approximately 350 feet wide. However, this location has adequate line-of-sight and adjacent LBZ easements, and is therefore not limiting to wildlife movement. All three lots have adequate cover to conceal the wildlife utilizing the area and all have visible pathways to the Ramona Grasslands Preserve of Areas B and C.

A-6

As discussed in Section 1.1 of the Draft EIR, a portion of Area B would be used to satisfy mitigation requirements and would be subject to an open space easement granted to the County. The owner plans to sell the remaining acreage in Area B to the County or to a conservancy acting on behalf of the Ramona Grasslands Preserve, for inclusion in the Ramona Grasslands Preserve. The owner plans to donate Area C in fee title to the County or conservancy acting on behalf of the Ramona Grasslands Preserve, for inclusion within the Ramona Grasslands Preserve. Approval of this project does not require the sale of the 138.5 acres of Area B to the County or a Conservancy, but Area B is designated within the specific plan as open space. This would preclude development in Area B without an amendment to the SPA and rezoning. Thus, even if the County did not purchase the acreage in Area B, it would remain as open space under County regulatory control. The open space designation would allow agricultural uses, to the extent that currently exists, and uses (e.g., open space conservation and utility maintenance) allowed under a Resource Management Plan.

and preserves and manages the 138.5 acres of Area B in perpetuity, we concur that impacts to the PAMA in this area have been adequately off set. If the County does not intend to purchase and preserve and manage the 138.5 acres, we request a detailed discussion of how the County will ensure that this portion of the PAMA will be preserved and managed in perpetuity.

A-7

3. The DEIR/HLP states that the management of open space lands within Area A would be funded through the establishment of a Landscape Maintenance District (LMD) through the County. We request that the County provide more information as to when and how the LMD would be established, as well as how it will be ensured that the LMD will remain in place and will be able to provide adequate funding for the open space management in perpetuity.

A-8

4. The Biological Technical Report for the Cummings Ranch Project (HDR 2010; BTR), states that golden eagles have been observed perching near the top of the central hills in Area A of the project site, as well as foraging over the open areas of the property. In addition, three golden eagle pairs are known to nest within several miles of the proposed project site. These nesting golden eagles are also expected to forage within the Ramona Grasslands Preserve during the non-breeding season and/or during periods of low prey availability (e.g., drought).

   Please be aware that on November 10, 2009, new regulations (74 FR 46835-46879) went into effect allowing the Service to issue two new types of permits to improve the management of bald eagles (*Haliaeetus leucocephalus*) and golden eagles under the Bald and Golden Eagle Protection Act ("Eagle Act Regulations"). The two permits are designed to protect public safety and manage activities or projects that may "disturb"[a] or otherwise incidentally "take" bald or golden eagles or their nests. Prior to these new regulations, there were no provisions for issuing permits under the Bald and Golden Eagle Protection Act for activities that could disturb or otherwise incidentally take these two species of eagles.[b]

   Based on the information provided above, we recommend that the final EIR contain a full assessment of any project-related potential impacts (direct, indirect, and cumulative) to

[a] The Bald and Golden Eagle Act defines the "take" of an eagle to include a broad range of actions including: pursue, shoot, shoot at, poison, wound, kill, capture, trap, collect, or molest or disturb.

[b] Prior to 2007, an Endangered Species Act permit was available to take bald eagles incidental to an otherwise lawful activity; however, when the bald eagle was delisted in 2007, there were no provisions for issuing permits under the Bald and Golden Eagle Protection Act for activities that could disturb or otherwise incidentally take either species of eagle. Because the growing population of bald eagles, in particular, could significantly curtail legal human activities if such permits were not available, new permit regulations were established under the Bald and Golden Eagle Protection Act to address this specific concern to bald eagles and to include permits to incidentally take golden eagles.

A-7

The process for establishment of a Landscape Management District (LMD) is outlined in the Board of Supervisor's Policy J 37. The Landscape and Lighting Act of 1972 (Act), Sections 22500, et seq., provides the County the ability to form an assessment district, and zones within that district, for several purposes, including street lighting, landscaping, parks, trails, and open space easements. For this project, the LMD would be established for the management and maintenance of the dedicated open space and portions of the trail system within Area A. LMD property owners have an assessment via placement of levies on the tax roll, as a line item of their property tax bills. An LMD will be established by the County Board of Supervisors prior to recordation of the final map.

Since this response was provided, it has been clarified that the LMD would be established for the management and maintenance of a portion of the trail system within Area A and would not include the dedicated open space.

A-8

The County agrees with USFWS that an assessment of golden eagles to occur within the project site and surrounding grasslands should be part of the project record. USFWS proposed additional survey requirements to establish the importance of the site for golden eagle foraging and the potential for impacts (USFWS determined that no suitable nesting habitat occurs onsite). The assessment found that the proposed Cumming Ranch project would have less than significant impacts on golden eagle foraging habitat. The total loss of foraging opportunities would be approximately 3 percent of available habitat with the majority of the loss composed of medium-quality (less than ideal) foraging habitat. In addition, proposed habitat improvements (conversion of cultivated areas to grasslands) would increase the availability of higher quality foraging habitat in the project's dedicated and designated open space. The assessment also references USFWS guidelines regarding disturbance from recreation activities such as hiking and biking and, based on that guidance, found that the Project's proposed passive recreational use that would be introduced onto the foraging habitat would have less than significant impacts. Hiking, biking, and equestrian use would not deter foraging behaviors of golden eagle and white-tailed kite and, therefore, under the new regulations, would not impact nesting success of this species. The golden eagle study (TAIC, May 27, 2011) is provided as Appendix P to the Final EIR.

Based on the results of the golden eagle surveys and assessment, the discussion of potential direct, indirect, and cumulative impacts to raptors and golden eagles has been clarified in Section 3.1 of the Final EIR, including a discussion of the 2011 revisions to the Bald and Golden Eagle Protection Act, as requested in this comment. Impacts to golden eagles are less than significant and are identified in the Final EIR.

the golden eagle, as well as a discussion of the project in terms of the Bald and Golden Eagle Protection Act. In addition, we recommend that the applicant contact the Service's Division of Migratory Bird Management to determine if there is a need to apply for an eagle take permit for the proposed project.

A-9

5. Based on the information provided in the BTR, several of the surveys for sensitive and federally listed species are more than 1 year old. In addition, arroyo toad surveys were not conducted following the current Service protocol. Therefore, we recommend that surveys for arroyo toad, gnatcatcher, burrowing owl, and SKR be updated. Surveys conducted for the arroyo toad, gnatcatcher, and SKR should be conducted following the Service's recommended protocols developed for these species.

A-10

If arroyo toad and/or SKR are observed on the property, it may be necessary for the applicant to obtain "take" authorization for these species through either a section 7 consultation (if a Federal nexus, such as the U.S. Army Corps of Engineers is involved) or through development of a Habitat Conservation Plan, pursuant to section 10 of the Endangered Species Act of 1973, as amended (Act) (16 U.S.C. 1531 *et seq.*). If gnatcatchers are observed on the property, potential impacts to this species would be addressed through the Habitat Loss Permit, pursuant to section 4(d) of the Act.

A-11

6. The DEIR/HLP indicates that the proposed project would include a trail system within the biological open space areas. We are currently working with the County to develop a Public Access Plan for the Ramona Grasslands Preserve. Because some of the currently proposed trails on the project site are located within future open space areas and within, or adjacent to, sensitive habitats that will become part of the Ramona Grasslands Preserve, we recommend that a trails plan (as well as proposed staging areas) for this site be designed in conjunction with the context of the larger Public Access Plan. Therefore, we do not yet concur with the proposed trail plan for this site; however, we value our long-standing partnership with the County and we remain committed to assisting the County in the continued review and development of a public access plan for the Ramona Grasslands Preserve, including the proposed project site, that avoids impacts to sensitive species and is compatible with the conservation needs of all the biological resources for which the Ramona Grasslands Preserve was established.

A-12

7. The DEIR states that permanent impacts to wetland habitats will be off set through on site creation/restoration/enhancement of wetland habitats. We request that the applicant submit final wetland creation/restoration/enhancement plans to the Service for our review and approval at least 30 days prior to initiating project impacts.

A-13

We acknowledge that the Cummings Ranch property is an important contribution to the Ramona Grasslands Preserve and the draft NCMSCP PAMA. We request an opportunity to visit the project site with the landowner and County prior to the final EIR to look at all aspects of the project on site within the greater landscape of the Grasslands Preserve.

A-9

While focused surveys were not completed within the past year, there are sufficient data based upon the series of past surveys and the consistency of the baseline to support the conclusions in this EIR. The survey information provided consistent negative results for endangered species on the site. However, for those species that have potential habitat in the disturbance areas of the project, a preconstruction survey is required, the impact has been theoretically analyzed, and mitigation if needed is identified. Conducting supplemental surveys at this time would not provide substantial information above and beyond that already noted in the EIR. Conducting supplemental surveys prior to grading would offer an opportunity to better avoid direct impacts to sensitive species. The general surveys of the Cumming Ranch TM property from 2000 to 2004 and in 2006 included focused surveys for federal and state listed species and for habitat indicators, as well as for County of San Diego sensitive species (burrowing owl). Protocol surveys over two survey years were completed for coastal California gnatcatcher (CAGN) (*Polioptila californica californica*), arroyo southwestern toad (AST) (*Bufo microscaphus californicus*), Quino checkerspot butterfly (QCB) (*Euphydryas editha quino*), and Stephens' kangaroo rat (SKR) (*Dipodomys stephensi*). Protocol surveys for CAGN and AST were also updated in 2010. The SKR biologist reviewed the site in 2010 and determined that an additional protocol survey was not required (O'Farrell 2010). All focused and protocol surveys were negative, except for San Diego fairy shrimp.

California Gnatcatcher

Though surveys for CAGN were negative, CAGN habitat is present onsite in several areas and approximately 26.4 acres of 88.7 acres will be impacted. Thus, potential direct and indirect impacts to CAGN are considered significant (Impact BI-15). An HLP will be required with concurrence by the Wildlife Agencies to establish incidental take for the species and its habitat. A pre-HLP/grading permit survey has been required as a condition of approval. Applicable mitigation measures incorporated in the Final EIR to reduce potential impacts to CAGN and their habitat include onsite preservation for impacts at a 2:1 ratio, open space management, pre-grading surveys, brushing and clearing restrictions during breeding season, and grading monitoring in the vicinity of sensitive habitat.

Burrowing Owl

No evidence was found of burrowing owl use of the site during general surveys from 2000 to 2010. Regardless, the Final EIR recognizes that burrowing owl habitat occurs on the site and, thus, potential impacts to burrowing owl are considered significant (Impact BI-15). The Final EIR requires mitigation specific to the species, including onsite preservation for impacts to non-native grassland at a 1:1 ratio, open space management, pre-grading surveys, brushing and clearing restrictions during breeding season, and grading monitoring and burrow/owl relocation, if necessary, in the vicinity of sensitive habitat. Mitigation would reduce potential impacts to less than significant.

The species-specific mitigation has been updated to be compatible with the recently published CDFG Staff Report on Burrowing Owl Mitigation (2012):

To minimize potential impacts specific to burrowing owls, which use their burrows year-round, the following measure shall be implemented:

(1) During the breeding season, February 1 through August 31, no brushing, clearing, and/or grading will be allowed. The Director of DPLU may waive this condition, provided no active owl burrows are within 800 feet of the brushing, clearing, or grading, as determined by take avoidance (preconstruction) surveys conducted from 14 days to within 24 hours before the initial brushing, clearing, and grading and ongoing weekly burrowing owl monitoring surveys (according to County or CDFG protocols).

(2) After young owls have fledged, or during September 1 through January 31, protocol preconstruction surveys and weekly monitoring throughout grading operations shall be conducted to determine if owls are present in the burrows. If present, a qualified biologist shall implement passive relocation measures in accordance with CDFG Staff Report (2012) and with wildlife agency concurrence. If no owls are present, grading activities may continue with weekly burrowing owl monitoring surveys to ensure no new burrows are occupied.

Arroyo Toad

There is no evidence that AST occupy this site and there limited potential exists for this species to be present due to marginal breeding habitat in the accessible portions of Santa Maria Creek and the marginal upland habitat with agricultural use and adjacency of Ramona Town Center. There are many reasons as to the current absence of AST onsite and the predicted absence in the future. These reasons include the following: marginal breeding habitat onsite due to inappropriate streambed substrate and lack of persistent flowing water during the breeding season in both Santa Maria Creek and Etcheverry Creek (Sweet 1989); marginal upland habitats for foraging and winter hibernation due to the consistent presence of agricultural activities (Sweet 1992); the occasional occurrences of grazing cattle in the streambeds and upland habitats from the adjacent property (Hayes and Jennings 1986); the presence of urban runoff and other pollutants within the creeks and watersheds; the presence of bullfrog (*Rana catesbiana*) and crayfish (*Procambarus acutus acutus*) within Etcheverry Creek; and the filling in of Santa Maria Creek with additional siltation and gravel/sand from upstream (Sweet 1989).

Agricultural practices throughout Area A most likely preclude the movement of dispersing toads from reaching appropriate over-wintering habitat. Agricultural practices and cattle grazing at the adjacent Hardy Ranch property have also precluded the presence of AST within this location. Although sub-adult and adult male AST are known to move between 1 and 2 kilometers within a streambed during the breeding and dispersal seasons, they typically move to areas that can support their various life functions. The Cumming Ranch TM does not contain the appropriate habitats for many of their life functions, with the potential exception of Santa Maria Creek and Etcheverry Creek being used as a dispersal corridor. Area B has undergone intensive agricultural activities for many years and no AST were found there either. Although Area C contains appropriate over-wintering hibernation substrate, no AST were found there.

Even though there is a very limited potential for this species to be affected by the project, potential impacts to AST are considered significant (Impact BI-15) and the Final EIR requires mitigation, including onsite habitat-based preservation and management, and protocol surveys to verify that they are not present prior to construction activities and completion of the Endangered Species Act (ESA) consultation process if they are found to be present. The following design measure has been added to the project:

If impacts specific to arroyo toad are identified prior to grading, the project shall obtain and be in conformance with an Endangered Species Take Permit:

> Prior to any brushing, clearing, or grading, an arroyo toad biologist shall examine the impact areas to determine if any portions of the site have suitable habitat for occupation by arroyo toad. Upon agreement with USFWS, a protocol survey may or may not be required. If it is determined that there are no arroyo toads present, no further action is necessary. If surveys indicate that arroyo toads are present, then an Endangered Species Take Permit shall be obtained. Permit conditions will include monitoring and species avoidance measures during construction, and may include dedication of open space easements over suitable habitat in Area B, open space habitat enhancements, and/or an endowment for conservation as a condition of the ESA take permit.

The Project's mitigation, the above design measure, and the ESA consultation process, if required, would avoid significant impacts to this species.

Quino Checkerspot Butterfly

The 2001 and 2004 surveys for Quino checkerspot butterfly (QCB) were negative. There is a limited distribution of QCB host plants onsite and the species is generally not expected to occur in the Ramona area. The species has some potential to occur in the habitat found at the proposed staging area, but in no

other location proposed for development. However the staging area and associated trails in Area C are no longer a part of the project and therefore impacts can be determined to be less than significant.

Stephen's Kangaroo Rat

The 2000 and 2004 surveys for Stephens' kangaroo rat (SKR) were negative. Based upon the previous surveys, it was determined that there was a very limited potential for this species to be present on the site. As noted on Page 37 of the Biological Technical Report: "Although SKR do occur on the Ramona Airport property, the distribution of heavy clay soils in the northern portion of the Cumming Ranch in Area C as well as on adjacent lands to the west (70-acre Hardy Ranch and 417-acre Cagney Ranch), will preclude the ability of SKR to colonize those areas that may be suitable within Areas A and B. An additional factor that will preclude SKR from dispersing into or colonizing Area C is the thick vegetative thatch that has accumulated since cattle-grazing was eliminated from this area" (O'Farrell 2010). Therefore, even though there is a very limited potential for this species to be affected by the project, potential impacts to SKR are considered significant (Impact BI-15) and the Final EIR requires mitigation including onsite habitat-based preservation and management, and field verification by an SKR biologist to determine if there is evidence and if protocol surveys should be done prior to construction. The following design measure has been added to the project:

If impacts specific to SKR are identified prior to grading, the project shall obtain and be in conformance with an Endangered Species Take Permit:

> Prior to any brushing, clearing, or grading, a Stephens' kangaroo rat biologist shall examine the impact areas to determine if any portions of the site have suitable habitat for occupation by Stephens' kangaroo rat. Upon agreement with USFWS, a protocol survey may or may not be required. If it is determined that there are no Stephens' kangaroo rat present, no further action is necessary. If surveys indicate that Stephens' kangaroo rats are present, then an Endangered Species Act (ESA) Take Permit shall be obtained. Permit conditions will include monitoring and species avoidance measures during construction, and may include dedication of open space easements over suitable habitat in Area B, open space habitat enhancements, and/or an endowment for conservation as a condition of the ESA take permit.

The Project's mitigation, the above design measure, and the ESA consultation process, if required, would avoid significant impacts to this species.

Based upon the information presented in the Biological Technical Report and Draft EIR, there are adequate data to support the conclusion that impacts to

these species are mitigated to less than significant. No additional surveys are warranted at this time.

A-10
The County and the project applicant acknowledge that a Section 7 or 10 consultation with USFWS is required, if there are qualifying impacts.

A-11
The County DPLU and DPR coordinated with the Wildlife Agencies regarding placement of trails in the Cumming Ranch project (March 1, 2012). The trails in Area B and the staging area and trails in Area C were discussed and determined to be inconsistent with the proposed Public Access Plan and Resource Management Plan (RMP) for the Ramona Grasslands Preserve, which states: "Because of (an) existing deed restriction (airports) and sensitive resources throughout this portion of the Preserve, most of the SE portion is unavailable for public access. However, the southeastern tip allows for connection to a future trail system associated with the proposed Cumming Ranch Development adjacent to the Preserve."

Since the above response was provided, the EIR has been updated regarding trails. The staging area and trails in Area C have been removed from the project. Additional details added to the FEIR state that a study will be done to adjust the future trail in Area B away from Santa Maria Creek, where possible. If the trail is constructed in Area B, the resource manager will provide management and monitoring of it to the satisfaction of the County DPR and USFWS in accordance with the Public Access Plan and Ramona Grasslands RMP.

However, DPR is requiring that the trail right-of-way in Area B be dedicated. DPR may build a community trail in this alignment in the future. The project trails within Area A and Hardy Ranch have been expanded to compensate for the loss of trails in Area B and Area C. The alignments for these new trails have been placed away from biological and cultural resources, following existing roads or trails and/or located within areas impacted by the project. In addition, the Final EIR has been updated to require that trail alignments (and the proposed trail right-of-way in Area B) may be adjusted in the field by the project engineer and a County listed biologist to remain outside of the wetland buffer and vernal pool watershed areas, and when constructed, be placed in the least damaging location as determined in the field by the Cumming Ranch resource manager. If the trail is constructed in Area B, the resource manager will adjust the trail alignment to the satisfaction of the County DPR and USFWS to be consistent with the Public Access Plan and Ramona Grasslands RMP, when approved.

Since the above response was provided, the EIR has been updated regarding trails. This updated response replaces the above paragraph. DPR is requiring that the trail right-of-way in Area B be dedicated. DPR may build a community

trail in this alignment in the future in coordination with the Ramona Grasslands Public Access Plan. In addition, the Final EIR has been clarified, with the standards for the additional alignment study for the future trail in Area B.

The trails on Area A and Hardy Ranch will be constructed and maintained pursuant to Appendix G of the Design and Location Criteria of the Community Trails Master Plan (CTMP) as adopted by the County of San Diego on January 12, 2005, and in conformance with the goals, policies, implementation strategies, and design criteria for determining the specific location of trails. These design criteria provide the basic framework to avoid potential impacts to sensitive resources, educate the public on resource protection, monitor for environmental effects, and respond to impacts by closing trails and/or with law enforcement. Compliance with the CTMP would occur via County field inspections during grading plan review, along with review of "as-built plans." Monitoring of the trails on Area A of the project site would occur separately as a part of the project's RMP.

Since this response was previously provided, the FEIR has been updated to state that the project trails within Area A and Hardy Ranch will be built by the developer in the alignment shown on the tentative map. Also, the specific alignment of trails would be within the 20-foot alignment shown on the TM. It is accurate that both construction and monitoring of the trails on Area A of the project site would occur as a part of the project's RMP.

A-12

It is correct that impacts to wetlands would be mitigated through onsite restoration and creation. Mitigation Measure M-BI-12a defines the required acreage necessary for mitigation. Mitigation Measure M-BI-12b requires the preparation and implementation of a Revegetation Plan that will detail all aspects of the creation, restoration, and/or enhancement of wetland habitats. The mitigation measure notes that the Revegetation Plan will require approval by the appropriate agencies prior to approval of grading plans for the project. Therefore, the final wetland mitigation plans will be provided to USFWS during the HLP issuance and ACOE permit processes.

A-13

All parties agree regarding the importance of the Cumming Ranch property to the Ramona Grasslands Preserve. Since the circulation of the Draft EIR, the applicant met with USFWS staff on March 7, 2011, regarding their comments on the project, specifically related to golden eagle issues. The County met with USFWS on March 1, 2012. Closing comments are noted.

We appreciate the opportunity to comment on the subject DEIR. If you have any questions, please contact Michelle Moreno of this office at (760) 431-9440.

Sincerely,

Karen A. Goebel
Assistant Field Supervisor

cc:
Gene Driscoll, 805 Properties, San Diego, CA

California Natural Resources Agency
DEPARTMENT OF FISH AND GAME
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ARNOLD SCHWARZENEGGER, Governor
JOHN McCAMMAN, Director

December 23, 2010

Mr. Larry Hofreiter
Department of Planning and Land Use
County of San Diego
5201 Ruffin Road, Suite B
San Diego, CA 92123

SUBJECT: COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT REPORT (EIR) AND DRAFT HABITAT LOSS PERMIT (HLP) FINDINGS FOR CUMMING RANCH: GPA 03-007; SP 03-005; TM 5344; STP 10-007; REZ 07-002, LOG NO., RAMONA, SAN DIEGO COUNTY (LOG NO. 03-09-028; SCH# 2004031136)

Dear Mr. Hofreiter:

The California Department of Fish and Game (Department or DFG), has reviewed the Draft Environmental Impact Report (EIR) and draft Habitat Loss Permit (HLP) findings for the above referenced project, dated November 4, 2010. The project was previously brought to County batching most recently on August 26, 2010, and the Department and U.S. Fish and Wildlife Service (USFWS, and collectively, "Wildlife Agencies") commented on the Notice of Preparation (NOP) of the Draft EIR in April 2004 (Attachment 1). The comments provided herein are based on the information provided in the Draft EIR and HLP, including their associated documents [e.g., *the Biological Technical Report for Cumming Ranch,* prepared by HDR (2010), BTR], the previous batching meetings, our knowledge of sensitive and declining vegetative communities, and our participation in regional conservation planning efforts.

B-1

The following statements and comments have been prepared pursuant to the Department's authority as Trustee Agency with jurisdiction over natural resources affected by the project (California Environmental Quality Act [CEQA] Guidelines §15386) and pursuant to our authority as a Responsible Agency under CEQA Guidelines Section 15381 over those aspects of the proposed project that come under the purview of the California Endangered Species Act (Fish and Game Code §2050 et seq.), Fish and Game Code Section 1600 *et seq.*, and other sections of the Fish and Game Code The Department also administers the Natural Community Conservation Planning (NCCP) Program. The County of San Diego (County) participates in the NCCP program by implementing its approved Multiple Species Conservation Program (MSCP) Subarea Plan.

The majority of the 682.6 gross acre project site is located within the proposed Pre-Approved Mitigation Area (PAMA) of the draft North County MSCP; specifically, the project site is in the community of Ramona, immediately west and contiguous with the Ramona Town Center. The site is shown on the Ramona 7.5' USGS Quadrangle, Section 12, Township 13 South, Range 1 East, San Bernardino Meridian. The project site is divided into three main areas (Areas A, B, and C). Area A consists of 358.7 acres, Area B 201 acres, and Area C 113.1 acres.

Existing surrounding land uses include the Ramona Town Center located to the east, the Ramona Airport to the north, and residential homes on lots ranging in size from 1 to 5 acres to the south and west. To the northwest of Areas B and C, the project site adjoins the Cagney Ranch and Hardy Ranch properties, both acquired by the County for inclusion in the Ramona

Letter B
CDFG Responses to Comments

B-1
Comment B1 is an introduction to the comment letter stating CDFG's involvement in County Batching meetings for the project, CDFG responsibilities, and summarizing project elements discussed in the Draft EIR. No response is necessary.

B-1 cont.

Grasslands Preserve. Santa Maria Creek and Etcheverry Creek traverse the project site. Currently, portions of Areas A and B are used for dry-land farming, mostly oat-hay, and cattle grazing throughout the year. Area C contains 22.2 acres of mitigation for vernal pools (Ramona Vernal Pool Preserve) for other projects; this mitigation area is fenced and not used for farming or cattle grazing in order to protect the sensitive vernal pools. A fire burned 22 acres of sage scrub in September 2003 in the central hills of Area A.

The proposed project is a major subdivision of the 682.6 gross acres into 125 residential lots and various open space parcels. The residential portion of the project would consist of residential lots ranging in size from 1.0 to 3.1 acres. Average lot size would be approximately 1.5 acres. Access for the project is via four points along Highland Valley Road. The project would include two additional secondary access/egress points for fire and evacuation use only. Water and sewer service would be provided by the Ramona Municipal Water District (RMWD). The project also proposes to install and fund construction for 3.40 miles of community trails and pathways, including a two-acre trail staging area.

Of the 682.6 acres, a total of 457.4 acres (approximately 67 percent) would be made available as permanent open space for inclusion in the Ramona Grasslands Preserve and 215.4 acres in Area A would be used for residential development. Approximately 9.8 acres of the property is located in right-of-way (ROW) for Highland Valley Road and SR 67. Of the 457.4 acres of permanent open space, 143.3 acres in Area A would be dedicated as permanent open space. Following recordation of the final map, the owner plans to (a) convey by sale 138.5 acres in Area B to the County or a conservancy acting on behalf of the Ramona Grasslands Preserve, and (b) convey approximately 113.1 acres of Area C in fee title to the County or a conservancy acting on behalf of the Ramona Grasslands Preserve.

Development of the project, including the residential pads, project roadways, installation of sewer lines and sewer lift station, trails and pathways, and road improvements, would result in permanent impacts on sensitive vegetation communities. The proposed project would result in 236.92 total acres of impact, including 233.1 acres of on-site impacts and 3.61 acres of off-site impacts. Off-site impacts would occur within the Hardy Ranch, along Highland Valley Road, and at the corner of Highland Valley Road and SR 67 as a result of the construction of the community trail, installation of the sewer line through Hardy Ranch, the widening and improvement of Highland Valley Road and associated culverts, and the improvement of SR 67 (Table 16 in the Draft EIR). Habitat impacts would include 0.20 acre of Open Engelmann Oak Woodland (OEOW), 0.06 acre of Open Coast Live Oak Woodland (OCLOW), 0.05 acre of Southern Willow Scrub (SWS), 0.05 acre of Mulefat Scrub (MFS), 1.02 acres of Cismontane Alkali Marsh (CAM), 0.03 acre of Non-Vegetated Channel (NVC), 26.80 acres of Diegan Coastal Sage Scrub Inland Form (DCSS), 19.55 acres of Granitic Southern Mixed Chaparral (GSMC), 4.05 acres of Granitic Chamise Chaparral (GCC), 12.94 acres of Non-Native Grassland (NNG), 164.69 acres of Field /Pasture (F/P), 0.23 acre of Eucalyptus Woodland (EW), 0.46 acre of Disturbed Habitat (DH), and 6.79 acres of Developed (Dev). No impacts to Valley Needlegrass Grassland (VNG) or Vernal Pools (VP) are proposed.

Mitigation for impacts to: OEOW, OCLOW, SWS, MFS, CAM and NVC is proposed at a 3:1 ratio; DCSS is proposed at a 2:1 ratio; NNG is proposed at 1:1 ratio; and to GSMC, GCC, and F/P at a 0.5:1 ratio. All mitigation is proposed on-site within open space lots in Areas A, B and C, except for 0.64 acre of DSS (52.6 acres required at a 2:1 ratio) which is proposed off site. Most of the mitigation is proposed within Areas A (86.3 acres), with some portion of Area B (62.5 acres) and C (25.3-acres) proposed as mitigation. Areas proposed for mitigation in Area A include open space lots A, B, D, F, G, I, J; however, lots C, E, and H in Area A are not.

Focused surveys for rare plants and sensitive species were conducted between the years of 2000 and 2004 and in 2006 for the following species: Quino checkerspot butterfly (*Euphydryas editha Quino/QCB*), San Diego fairyshrimp (*Branchinecta sandiegonensis/SDFS*), arroyo southwestern toad (*Bufo microscaphus californicus/AT*), coastal California gnatcatcher (*Polioptila californica californica/CAGN*), Stephens' kangaroo rat (*Dipodomys stephensi/SKR*), and herpetofauna and raptors. No specific dates for burrowing owls (*Athene cunicularia*/BUOW) surveys were provided in the EIR or BTR. Additional follow-up surveys were performed in 2010 for CAGN and AT. Based on the surveys, the EIR and BTR conclude that no QCB, AT, CAGN, SKR, or BUOW were observed on site; however, appropriate/suitable habitat is present onsite for all of these species.

B-1 cont.

The following sensitive plant species were identified on the site during surveys: Engelmann oak (*Quercus engelmannii*); southern tarplant (*Centromadia parryi* ssp. *australis*); and spreading navarretia (*Navarretia fossalis*). In addition, the following sensitive animal species were observed on site: western spadefoot toad (*Scaphiopus hammondii*); coast horned lizard (*Phrynosoma coronatum*); granite spiny lizard (*Sceloporus orcutti*); granite night lizard (*Xantusia henshawi*); California whiptail (*Cnemidophorus tigris mundus*); orange-throated whiptail (*Cnemidophorus hyperythrus*); two-striped garter snake (*Thamnophis hammondii*); turkey vulture (*Cathartes aura*); white-tailed kite (*Elanus caeruleus*); northern harrier (*Circus cyaneus*); golden eagle (*Aquila chrysaetos*); Cooper's hawk (*Accipiter cooperi*); red-shouldered hawk (*Buteo lineatus*), ferruginous hawk (*Buteo regalis*); loggerhead shrike (*Lanius ludovicianus*), mountain lion (*Felis concolor*); American badger (*Taxidea taxus*); San Diego desert woodrat (*Neotoma lepida intermedia*); San Diego blacktail jackrabbit (*Lepus californicus bennettii*); and southern mule deer (*Odocoileus hemionus*).

The Department offers the following comments and recommendations to assist the County in avoiding, minimizing, and adequately mitigating the project-related impacts to biological resources, in providing a project that meets the HLP requirements, and in ensuring the project is consistent with, and does not adversely affect, ongoing regional habitat conservation planning efforts.

A. Consistency with North County MSCP and HLP Requirements

B-2

1. Based on our review of the draft North County MSCP and related habitat evaluation maps, the habitat within and adjacent to the project site (mostly located within the Pre-Approved Mitigation Area of the Ramona Grassland core area) is identified as "high" to "very high" quality. Additionally, as shown in Figure 7 in the BTR, primary wildlife linkages cross the site, including the Santa Maria Creek, Etcheverry Creek, and SR-67 linkages. Furthermore, the site supports several raptor species (including white-tailed kite, northern harrier, and golden eagle) that either winter, forage, and/or nest on site or in adjacent areas. The property also contains vernal pools resources, evidence of larger game movements, and significant blocks of native habitat, including DCSS, and substantially contributes to a larger 4,500 acre block of core habitat referred to as the Ramona Grasslands. For these reasons, the HLP findings should identify the property as high rather than "intermediate" conservation value.

B-3

2. The Department appreciates the applicant's proposal to convey portions of Areas B and C to the larger Ramona Grasslands Preserve as part of this project. However, the proposed Open Space lots proposed as mitigation in Area A would likely be subject to long-term indirect edge effects from the residential uses, roads, and public use in the open space. For the MSCP, a guideline of 200 feet is often used as the distance edge effects are assumed to reach. While it is acknowledged that Lots C, E, and H would not be considered as mitigation and would be impact neutral, the Department requests that (absent relocation of some of the proposed building lots – see comment A3) the proposed remaining open space lots (specifically, Lots A,

B-2
The Biological Technical Report provides the analysis of the conservation value of CSS on the site in accordance with Section 86.104 of the County of San Diego Code and Section 4.2.g of the CSS NCCP Process Guidelines (CDFG 1993). Mitigation ratios based on the CSS Evaluation Logic Flow Chart are discussed in Section 7.4 of the report. The CSS located on the project site is not the most dense in the region and does not support a high density of target species or significant populations of highly endemic species or rate sub-habitat types and therefore does not qualify as a Higher Value District.

B-3
See Response to Comment A-5. Proposed mitigation has been revised to make Lots A, B, D, and F impact neutral. No mitigation credit will be provided in this area. Additional mitigation to compensate for the loss of mitigation area is being accomplished in Area C.

B, D, and F) not be given full mitigation credit because they would effectively be isolated islands of small, remnant open space that would be surrounded by development and subject to long-term edge effects from adjacent land uses throughout Area A.

B-4 3. Alternatively, the Department would consider the proposed open space lots in Area A suitable as mitigation if the project design were modified by strategic relocation of some of the proposed building lots and associated roads in Area A, in particular Lots 1-4, Lots 87-90, and Lots 101-109, as we recommended in previous batching meetings and more generally in the Wildlife Agencies' 2004 NOP comment letter. Such relocation would need to be done in a manner to improve the long-term biological viability of the open space lots in Area A, and make them more suitable as project-related mitigation and to meet the HLP requirements. Here, we provide one approach to relocation of the building lots in a manner that would achieve these objectives. For example, Lots 101-109 and the loop road could be relocated to the interior areas of Area A to allow Lot I to have a functional connection to Areas A and B and to conserve a larger block of habitat in the PAMA. We believe with creative engineering, there may be an opportunity to relocate Lots 1-4 and Lots 101-109 to areas near Lots 114-120 and Lots 82-86 (see Attachment 2).

B-5 If the relocation of residential lots in Area A cannot be accomplished to eliminate the edge effects and isolation to open space lots, then (a) the final EIR and HLP findings should include a written analysis with exhibits (where necessary) clearly demonstrating what constraints prevent relocation of these lots, and (b) mitigation for upland and wetland project impacts should be directed to Areas B and C (also see comment A2). Areas B and C are located within the North County MSCP PAMA and are also part of a primary linkage for Ramona Grasslands (Santa Maria Creek Linkage and SR-67 Linkage [see Figure 7 of the BTR]). Mitigation could include wetland and upland restoration to improve the wildlife connections, fencing, invasive removal, improved crossing under SR-67, etc.

B-6 4. The project proposes impacts to 26.80 acres of CSS in the Ramona Grasslands Planning Unit (13) of the draft North County MSCP PAMA. Section 6.6 and Exhibit B of the North County MSCP Planning Agreement (October 29, 2008) that the County entered into with the Wildlife Agencies address interim project processing, and identify the guidelines agreed to by all parties to "*…ensure that development, construction, and other projects or activities approved or initiated in the Planning Areas before completion of the Plans are consistent with preliminary conservation objectives and do not compromise successful completion and implementation of the Plan…*". These guidelines include the NCCP/4(d) findings and the preserve design principles that are to be incorporated into projects and disclosed in the associated CEQA documents. The preserve design findings that are to be followed include the following.

B-7
- On-site open space should provide a long-term biological benefit.
- On-site open space must protect habitat of equal or greater value as that being impacted.
- No isolated pockets of open space should be used for mitigation credit.
- Separate lots should be used whenever possible for on-site open space to help protect the biological value of the preserved areas.
- On-site open space shall contribute to regional conservation efforts.
- Open space design, to the extent known, should not reduce the biological diversity at the site.
- Open space design shall maintain habitat connectivity between areas of high quality habitat.
- The most sensitive resources shall be protected to maximize long-term viability.
- Edge effects and habitat fragmentation shall be minimized by maximizing the surface area to perimeter ratio, preserving large blocks of contiguous open space. Edge effects shall be further minimized by establishing buffers, providing fencing and/or permanent signs, and limiting trails and/or lighting.

B-4
Substantial efforts have been made to design the project as proposed. The relocation for Lot 109 has been accomplished to expand the corridor to the south and into open space lots I and G. As a result of this evaluation, the Tentative Map has been revised to relocate Lot 109 to south of Highland Valley Road adjacent to Open Space Lot C. The relocation of this lot further increases preservation of habitat within the PAMA and increases the connectivity between Open Space Lots I and J. The loop road connection is not able to be removed due to fire agency access requirements. As can be seen in updated Figure 1-5, the relocation of Lot 109 increases the distance between the building pads of lots 08 and 110 along the loop road to 1,000 feet. In addition, the modification resulted in the ability of the project to keep all coastal sage scrub mitigation within the project site.

B-5
Lots A, B, D, and F have been revised to be identified as impact neutral, as requested. However, wetland mitigation will remain in Lots A and B. Additional mitigation previously being provided within these lots has been moved to Area C. Remaining mitigation components within Area A include Lots G, I, and J. Refer to Response A-5 for the rationale. In addition, wetland mitigation is being accomplished within Lots A and B, as this area was determined to be the most suitable onsite for wetland habitat creation and enhancement to achieve no net loss. The proposed Area A wetland mitigation site offers the best onsite wetland/riparian mitigation opportunity, as riparian functions in the proposed location are substantially degraded and no sensitive plant or animal species would be impacted by the restoration program. This location was also chosen because of its access to irrigation and because the existing hydrology will support the planned planting pallet and it will provide cover for wildlife where none exists now. Other locations were found to be functioning at a higher level and were comparatively more pristine even with agricultural disturbances; thus, these locations would not benefit as greatly from enhancement.

B-6
Comment B-6 provides background regarding the MSCP Planning Agreement dated October 29, 2008, and identifies guidelines to address interim project processing. No response is necessary.

B-7
The draft NCCP/4(d) findings will be included in the Staff Report for the project and are based on the Biological Technical Report (Appendix B). The preserve design principles included in the MSCP Planning Agreement have been incorporated into the design of the project and are discussed throughout the applicable sections of the findings. The Final EIR has been revised to specifically identify and address the HLP findings, as follows:

County of San Diego Habitat Loss Permit (HLP) Ordinance

The County's HLP Ordinance (Section 86.101 et al) requires compliance with the Natural Communities Conservation Planning (NCCP) Act for projects located within the planning area for the Coastal Sage Scrub NCCP. The County of San Diego became a participant in the NCCP in 1993 with the stated intent to "…provide for regional protection and perpetuation of natural wildlife diversity while allowing compatible land use and appropriate development and growth." The NCCP Process Guidelines were established as interim guidelines until formal subregional plans were approved. The draft North County Multiple Species Conservation Program (NCMSCP) would be the subregional plan for this portion of the County of San Diego when adopted. For the NCMSCP, most of the project area is within proposed Pre Approved Mitigation Area (PAMA) and therefore the project's preserve design and its onsite mitigation is important to development of the NCMSCP. Decision makers must determine that the project complies with the interim program by making findings relative to the overall goals and policies of the NCCP, including that the project will not preclude or prevent the preparation of the future NCMSCP.

The findings relate to maintaining connectivity between areas of high habitat values, minimizing and mitigating the habitat loss, and not reducing the likelihood of survival or recovery of listed species. The required findings can be made because the project proposes development on the most disturbed habitats, primarily habitats that have been farmed for decades, in the southern area that is adjacent to Highway 67 and existing development. The project proposes open space for wildlife use areas that form the Ramona Grasslands Preserve, including the Santa Maria Creek, Etcheverry Creek, and major hilltops and ridgelines, and would accomplish its mitigation within the project area by preservation of the northern area that has the most connectivity with the existing Preserve to the north and to the southeast along Etcheverry Creek toward rural areas of southern Ramona and Barnett Ranch. The habitat loss will not appreciably reduce the likelihood of survival and recovery of listed species in the wild; in fact, biological surveys did not establish any direct impacts to listed species. Potential habitat of listed species will be avoided by preserving Santa Maria Creek, Etcheverry Creek, and major hilltops and ridgelines, as well as incorporating other project measures such as preconstruction surveys, grading limitations and monitoring, a Resource Management Plan, fencing as necessary, and signage to reduce edge effects. Specific studies (most recently Schaefer, May 27, 2011) demonstrated that the project, as designed, will not appreciably impact golden eagle foraging or other raptors. Overall, the project is consistent with the HLP Ordinance and the NCCP because it contributes to the regional preserve design, allows for the continued survival of endangered species, and appropriately mitigates for impacts. Habitat loss would be incidental to lawful activities.

With incorporation of the recommended project changes from CDFG and USFWS, the decision maker will be able to make the NCCP/4d findings above and the project will follow the preserve design principles listed in comment B-7, including those listed below:

- The project's open space provides (1) long-term benefit, (2) habitat of equal or greater value than the impacted habitat, and (3) contributes to regional conservation efforts.
- The project open space design (1) does not reduce the biological diversity at the site and (2) maintains habitat connectivity between areas of high quality habitat.
- Isolated pockets of open space shall not be used for mitigation credit.
- The most sensitive resources are protected; and edge effects and habitat fragmentation are minimized.

B-8 To ensure that the target conservation goals of the North County MSCP can be achieved and that HLP requirements are met while we are working with staff to finalize the Plan, the project-related final EIR and HLP findings should demonstrate how the project is consistent with the above preserve design findings and state that impacts within the draft PAMA for the North County MSCP (including CSS) will be mitigated in-kind within the draft PAMA for the North

B-9 County MSCP. As we indicated in batching meetings, the smaller, isolated open space lots within Area A would not be suitable as CSS mitigation for project impacts (see also comments A2 and A3).

B-10 5. Overall, the project proposes an approximately 33/67% development-to-conservation percentage for the property. Provided, minimally, that the eastern perimeter and other lots are relocated from the project to make the open space in Area A viable as mitigation (see comments A2, A3, and A4), this proposed development-to-conservation percentage for the property would ensure that the project is consistent with the conservation objectives and does not compromise successful completion and implementation of the draft North County MSCP for this area of the PAMA (other areas are expected to follow a 25% to 75% development to conservation ratio). This being said, the Department believes that the optimal design for the project would direct all development to areas located outside of the planned PAMA, which would be mainly south of Highland Valley Road.

B-11 6. Based on the information provided in the Draft EIR and HLP findings, it is unclear to the Department whether the remaining acreage in Area B and Area C is proposed as a mitigation bank. The final EIR and HLP findings should clarify if any mitigation banks are proposed in association with the transfer of open space lands in Areas B and C.

B. Sensitive Species Surveys and General Biological Surveys

B-12 1. The Draft EIR and BTR indicates that, with the exception of the surveys performed in 2010 for CAGN and AT, the rare plant and sensitive species surveys were last conducted in 2004-2006, mostly at times when the detection probability for sensitive annual plant species is low, and in some cases not to federal or state protocols. These plant and species surveys, including those for CAGN, SKR, AT, BUOW, and vernal pool plants, should be updated and the results included in the final EIR and HLP findings. Without this updated information in the EIR and HLP findings, the Department cannot concur with the issuance of the HLP or proposed CEQA mitigation for the project. See also comment B2 below.

B-13 2. The draft HLP findings note that updated CAGN surveys were conducted in 2010. However, no report was provided in the Technical Appendices for the EIR/project. Please provide this information in the final EIR and HLP findings.

B-14 3. The BTR notes that at least two fully protected state species have been observed on site (white-tailed kite and golden eagle). Under state regulations, no take of fully protected species is permitted. For the golden eagle, the Department recommends that the applicant consult with the USFWS to see what permits may be required relative to the eagle. In addition, based on the information provided in the BTR and known occurrences of these species in the area, we recommend that the final EIR include an updated analysis of proposed project impacts (including the edge effects from the use of the proposed trail system and staging area) on these two fully protected raptor species.

B-15 4. The BTR notes that spiny redberry, a host plant for the hermes copper butterfly (*Lycaena hermes*/HCB), was observed on site. Please provide the mapping for these locations. The final

B-8
As noted in B-7, additional language has been added to the Final EIR to expand the discussion on the project's consistency with the preserve design findings. All project impacts to habitat are proposed to be mitigated in-kind within the project site. With the adjustment of the location of lot 109, CSS will also be mitigated in-kind onsite, within proposed PAMA.

B-9
As noted in Response to Comment B-3 above, Lots A, B, D, and F have been revised to be identified as impact neutral. While the habitat within these lots will still be preserved, no mitigation credit will be given.

B-10
The project is only subject to the NCCP at this time. The Draft NCMSCP has not been adopted but every effort has been made to avoid biological impacts to grasslands contiguous to the Ramona Grasslands Preserve. The proposed PAMA covers a large portion of the project area; however, the project area near Highway 67 is not included in the PAMA. The correct proportion of the development within the draft PAMA is 26 percent with 74 percent proposed as open space, which is considered consistent with the NCMSCP, if approved.

B-11
Area B and Area C are not proposed as mitigation banks as a part of this project. The accounting of mitigation land is primarily for establishing a monetary value for Area B in its sale to a conservancy.

B-12
CDFG has requested updated surveys for California coastal gnatcatcher, Stephen's kangaroo rat, arroyo toad, and burrowing owl. Please see Response to Comment A-9 that addresses the request for updated surveys on these species. Unanticipated impacts to rare plants are not expected because the project footprint is primarily within currently or former cultivated areas and it is not expected to have any unforeseen endangered plant impacts; therefore, additional rare plant surveys are not warranted. Protocol surveys for California coastal gnatcatcher, Stephen's kangaroo rat, arroyo toad, and burrowing owl are required prior to construction (and prior to issuance of the HLP). The proposed RMP also includes updating surveys and reporting on the presence of sensitive species.

General biological resource surveys and vegetation community mapping were conducted on multiple visits throughout 2000 to 2004, and in 2006 at the Cumming Ranch property (HDR), and verified again in 2010 (AECOM and TAIC). Several sensitive and/or potentially occurring sensitive resources were identified during those surveys. Based on the general surveys, various focused surveys were conducted in the years of 2000, 2004, 2006, and 2010 including surveys for

federally and state-listed species, and species considered sensitive by the County. While the focused surveys were not completed within the past year, the multiple past surveys are sufficient to support the conclusions in this EIR. All focused surveys were negative for the presence of endangered species on the site, except for San Diego fairy shrimp, a vernal pool species that would not be impacted by the project. These surveys determined whether the site was likely to provide species' habitat, and, where potential habitat was noted, impacts were analyzed and mitigation was identified (County Biology Report Requirements do not require updating surveys after 1 or more years and site conditions have not markedly changed in the development footprint, which consists primarily of cultivated agricultural habitat).

Additional surveys are not needed at this time; surveys for California gnatcatcher, burrowing owl, Stephens' kangaroo rat, and arroyo toad have been made conditions of approval to be completed prior to brushing, clearing, or grading. If listed species are present at that time, the project would obtain an ESA take permit. This timing would provide additional information for the Habitat Loss Permit and would provide the most up-to-date information for siting trail and pipeline alignments (which pose the most likely location of any occupation). As noted above, mitigation and design measures have been incorporated to minimize or avoid impacts to sensitive species.

B-13
Updated CAGN surveys were conducted in June 2010 by a USFWS permitted biologist. The survey report was inadvertently omitted from the appendices of the Draft EIR. The 2010 survey report is provided in Appendix K of the BTR, which is provided in Appendix B of the Final EIR. Of note, surveys were provided in chronological order, with the most recent surveys at the end of Appendix K.

B-14
As recommended, the applicant has consulted with USFWS regarding golden eagle and white-tailed kite. As recommended by USFWS, a new study was completed that included golden eagle and white-tailed kite surveys and a habitat assessment to determine potential project-related impacts to foraging habitat as well as impacts from recreational use. The study found that the proposed Cumming Ranch project would have less than significant impacts on foraging habitat and less than significant impacts due to recreational uses. See Response to Comment A-8 for additional details.

B-15
The spiny redberry is not dominant among species present in the coastal sage scrub found on the site. During the QCB surveys, no Hermes copper butterflies (HCB) were noted and, in fact, there are no records of HCB ever occurring in the Ramona area (12-month Petition for Listing, 3/29/11). Even with the presence of redberry, HCB is not expected to occur.

EIR should include a habitat suitability analysis for the HCB, and results from surveys conducted for HCB (during the appropriate time of year) if the habitat suitability analysis indicates surveys are warranted.

C. Proposed Impacts and Mitigation

B-16 1. Per previous comments, due to the edge effects that would occur to the open space areas in Area A, unless some residential lots can be relocated, mitigation (wetlands and uplands) should be directed to open space in Areas B and C to maximize habitat quality and functionality in the Ramona Grassland Preserve As previously stated, with strategic relocation of some residential lots and associated roads, we believe that the open space lots in Area A would be viable as mitigation (see comments A2 and A3).

B-17 2. Please note that the proposed off-site impacts to the adjacent property will be counted for that site's allowable development area once the North County MSCP is completed.

B-18 3. Section 7.2 of the Draft EIR indicates that 0.64 acre of off-site mitigation for CSS impacts would be required for the project. To be consistent with HLP requirements, we recommend that impacts within the draft PAMA for the North County MSCP (including CSS) be mitigated in-kind within the draft PAMA for the North County MSCP (see comments A2 and A3).

B-19 4. The draft EIR and BTR reference the raptor breeding season as being from February 15 to August 31. To avoid potentially significant adverse effects on sensitive avian species, similar to other County projects, we recommend that the County condition the project to conduct all habitat clearing and grading activities outside the avian breeding season (January 15 and August 31). An exception may be granted if focused surveys ensure no birds are breeding in areas which would be subject to impacts.

B-20 5. The project includes the set-aside of two-acres of mapped non-native grassland (NNG) within Area C, which is to be conveyed to the County or other qualified entity as part of the Ramona Grasslands Preserve. The Technical Appendices to the Draft EIR note that QCB surveys were conducted in 2004 and that host plants for the QCB are located on the proposed two-acre staging site. The Department recommends that the County consult with the USFWS to determine if updated surveys for QCB will be required for this area before construction of the staging area commences.

B-21 6. The Draft EIR and HLP findings do not adequately analyze the short and long-term impacts from the proposed trail system and staging area. At the batching meetings, the proposed trail system was not discussed. As currently proposed, absent current biological survey information, the Department does not concur with the proposed trail system, including its two-acre staging area on Area C. If the trail must be located within the proposed open space, the final EIR and HLP findings should include a compatibility analysis based on updated survey information to demonstrate that the location of the trail would be in the least sensitive area of the proposed open space.

B-22 7. The proposed project includes lands that would be conveyed to the County, or other qualified conservation entity, for inclusion in the Ramona Grasslands Preserve. The Department recommends that the final EIR require, and final HLP findings commit to, the recordation of a conservation easement over all lands conveyed for open space or as mitigation for habitat and species impacts. The Resource Management Plan (RMP) required for the

B-23 project should also be reviewed and approved by the County and Wildlife Agencies prior to construction on site and/or opening of any trails on the project site. This Wildlife Agency review

B-16
The County has considered the Department's comment, and the applicant has agreed to move Lot 109. See Response to Comment A-5 and B-5 above.

B-17
All the impacts, including offsite impacts, have been clearly identified and mitigation has been proposed according to the County Guidelines for Determining Significance and Report Requirements for Biological Resources. The North County MSCP is draft and its effect on the project mitigation is not at issue. The NCCP Findings and MSCP Planning Agreement preserve design principles determine the project's compatibility with future HCPs. Allowable development area is not site/parcel specific and would not be precluded under the North County MSCP, if approved. Further, any proposed development on adjacent parcels would require approval from the County of San Diego.

B-18
With the relocation of Lot 109, the amount of impacted coastal sage scrub has been reduced and eliminates the need for offsite mitigation. All impacts to coastal sage scrub will be mitigated onsite as detailed within Section 3.1, Biological Resources.

B-19
The raptor breeding season has been revised in the Draft EIR to January 15 through August 31, as requested.

B-20
The staging area and associated trails are no longer a part of the project.

B-21
Please see Response to Comment A-11. The batching meeting notes indicate that the trails were discussed and that they would have additional analysis before being finalized. Since the draft Public Access Plan for the Ramona Grasslands Preserve has been released for public review, the County has agreed that the trails proposed for Area C would not be included in the project and the trail in Area B would not be built by the applicant (right-of-way would be dedicated in accordance with the Community Trails Plan, but trail construction would be considered in the future as part of the Ramona Grasslands Preserve).

Since the above response was provided, the EIR has been updated regarding trails. DPR is requiring that the trail right-of-way in Area B be dedicated. DPR may build a community trail in this alignment in the future in coordination with the Ramona Grasslands Public Access Plan. In addition, the Final EIR has been

clarified, with the standards for the additional alignment study for the future trail in Area B.

B-22
The mitigation measures included in Section 3.1.5 of the Draft EIR require recordation of open space easements to the County or conservation easements to the Department for all lands required as mitigation for habitat and species impacts. If the County takes ownership of Areas B and C, there would be no easement to the County, only to DFG if required through the HLP concurrence or volunteered by the applicant.

B-23
The Conceptual Resource Management Plan (Appendix C of the Draft EIR, TAIC 2010) was circulated for agency and public review. As required by Mitigation Measure M-BI-1, the RMP shall be approved and funded for the open space area prior to the approval of a grading permit for the project. The comment indicates that additional comments on the draft HLP findings or the draft RMP will be sent; no comments were received by the County. The agencies will also be able to review the RMP prior to the issuance of the HLP.

B-23 CONT should be made part of conditions of approval for the proposed project. The Wildlife Agencies are currently working with the County on a Public Access Plan for Ramona Grasslands that is expected to be incorporated into the final Ramona Grasslands RMP. Please also see our RMP letter to the County dated June 18, 2009, which provides detailed comments on the requirements for trails to be consistent with the MSCP and HLP requirements. The Department will provide preliminary comments on the draft RMP that was circulated with the draft EIR and HLP findings within (3) three-weeks of the date of this letter.

B-24 8. To ensure that the proposed on-site mitigation does not reduce the biological diversity at the site, provides a long-term biological benefit and contributes to regional conservation efforts (e.g., North County MSCP), the final HLP findings and County permit should include as an enforceable permit condition of approval that only native, non-invasive plants will be used in project erosion control/revegetation that occurs within or adjacent to natural open space to minimize potential impacts to wildlife and native habitats. For any areas within required fuel management areas, we recommend that the County work with the Fire District and the Department to retain native succulents/cacti and to develop an appropriate native, low fuel load/fire retardant plant palette to be used for project erosion control/revegetation.

B-25 9. Please quantify in the final EIR and HLP findings how much of the project would reduce the primary wildlife linkages (e.g., Santa Maria Creek Linkage and SR-67 Linkage [See Figure 7 of the BTR]); especially the linkage south of Highland Valley Road where most proposed impacts would occur. As indicated in Section 6.4.1 (page 27) of the BTR, lands contributing to the Ramona Grasslands or linkages are defined as sensitive habitat lands that require mitigation.

B-26 10. Due to the prevalence of raptors and reptile species that have been documented to use the project site, and the project site's contribution to the Ramona Grasslands core area, the Department recommends that mitigation for field/pasture, especially those areas not in active production (e.g., Areas in A and B) occur at a 1:1 ratio, similar to the proposed mitigation ratio for NNG.

B-27 11. The Department requests an opportunity to visit the project site prior to finalization of the EIR and HLP. It is expected that many of our comments in this letter may be resolved based on this site visit and updated biological surveys (See comment B1).

B-28 12. The Draft EIR and BTR propose a 50-foot buffer for the on-site wetlands. For Department jurisdictional wetlands and per MSCP guidelines, a minimum 100-foot buffer is typically required for wetlands. In addition, no trails should be located within the required wetland buffer; however, such uses may be appropriate in the limited building zones (LBZ) proposed adjacent to the wetland buffers. Required wetland mitigation for impacts on Department jurisdictional areas will be determined as part of the Fish and Game Code 1600 process if the activities are subject to a 1600 Agreement between the Department and the applicant. Five (5) years of

B-29 monitoring is typically required for mitigation for impacts to jurisdictional wetlands. Copies of the proposed Wetland Mitigation Plan should be provided to the Department's 1600 staff as part of that process, as well as NCCP/CEQA staff as part of the final EIR and HLP findings. In

B-30 addition, the wetland analysis appears to include NNG (1.21 acres) and vernal pools as Department jurisdictional streambed/wetlands. Please include more justification in the final EIR and 1600 notification on these areas.

B-31 13. The Draft EIR proposes that only one of the existing culverts under Highland Valley Road be upgraded from an existing 36-inch culvert to a triple 4x8 culvert (the existing central culvert would remain as a 3x1.5 culvert). The Department recommends that all culverts along the portion of Highland Valley Road adjacent to and within a quarter mile of the project site be

B-24
As detailed under Limited Building Zones in Section 1.1.2 of the Draft EIR, all lots that occur adjacent to natural open space will have a 100-foot-wide Limited Building Zone (LBZ) recorded. The LBZ specifically prohibits exotic invasive landscaping materials as outlined in Mitigation Measure M-BI-17a. The Fire Protection Plan, Appendix K of the Draft EIR requires restrictions on highly flammable materials and requires revegetation with native *Q. agrifolia, Q. engelmannii,* and *Plantus racemosa.* The full plant palette developed for the project is provided in Figure 1-13 of the Draft EIR.

B-25
The project does not reduce the effective width of either of the primary wildlife linkages (Santa Maria Creek or Etcheverry Creek Linkages). The two corridors south of Highland Valley Road will be reduced significantly. However, they are marginal corridors along existing drainage swales through the farmed area. One corridor will have a pinch point of 150 feet but otherwise both are in excess of 200 feet. Figure 7 clearly shows these two corridors as truncated due to the existing development south of the project and because animals have difficulty crossing Highway 67. Impacts to these corridors are less than significant.

For the primary linkages, there could be a minor reduction in function from the construction of sewer lines and trails and from use of trails through the Hardy Ranch for the onsite portion of Etcheverry Creek southeast/northwest-trending movements. This would be a temporary significant impact and mitigated by the RMP to less than significant. Refer to the BTR for the wildlife movement evaluation. A six-step checklist (Beier and Loe 1992) was used as it pertains to the specifics of the Cumming Ranch Project. The checklist conclusion is presented in Figure 7 of the BTR.

B-26
Those areas designated as field/pasture are all in active production and have been for decades. Furthermore, the site is not within the boundaries of the Ramona Grasslands Preserve. Substantial effort was made to maximize preservation of grasslands in the north, while allowing development in the south. This area has been consistently farmed and has not been planned for inclusion in the Ramona Grasslands Preserve. With the implementation of the project, however, the area has the potential to be restored into habitat suitable for inclusion into the Preserve. Therefore, consistent with the Guidelines for Determining Significance for Biological Resources, mitigation ratios are 0.5 to 1 for the field/pasture acreage that is outside of the Ramona Grasslands Preserve. Mitigation ratios are appropriate and consistent with the County's policies. These project mitigation ratios have been established over time based on the rarity of the habitat and the potential for impacts. According to County Biological Guidelines:

The standard ratios factor in the importance of preserving areas necessary to ensure the continued survival of species. Mitigation ratios are standardized and not dependent upon the quality of habitat. Rather, the mitigation ratios recognize the regional importance of the habitat, its overall rarity, and the number, variety and sensitivity of species it supports. Mitigation for habitat loss is required to compensate for direct impacts as well as cumulative loss of habitat.

As presented in the 2011 Ramona Grasslands Preserve Draft Resource Management Plan, the project area is not within the planned boundaries of the Ramona Grasslands Preserve (http://www.sdcounty.ca.gov/reusable_components/images/parks/doc/RG_Resource_Management_Plan.pdf).
Therefore, impacts to field/pasture are appropriately set at the standard 0.5 to 1; impacts to grasslands are appropriately set at the 1:1 ratio as required by the County Guidelines for Determining Significance for Biological Resources. Note: impacts to active production field/pasture in Areas B and C were assessed at a 1:1 mitigation ratio.

B-27
As noted in Response to Comment A-13, the County and applicant have met several times with CDFG and USFWS staff, but efforts to set a field meeting have been unsuccessful up to May 2012.

B-28
The wetland buffer areas were designed in accordance with County RPO guidelines. The 50-foot wetland buffer is the minimum buffer width in Area A (the development area), in addition to the 100-foot LBZ, which restricts development and use. As detailed in Section 3.1.3 of the Draft EIR, the determination to use a minimum 50-foot-wide buffer on either side of wetlands and waters was based on the overall quality and function of the wetland. In this case, the wetlands are upland tributaries with little or no vegetation and the adjacent upland area has been used for agriculture for many years. The land adjacent to the wetland buffer will have an enhanced 100-foot-wide residential lot LBZ easement, which will provide added protections including a restriction on development in certain areas, on certain uses, on artificial lighting, and on exotic invasive landscaping. In addition, most of the wetlands and wetland buffers would be protected within the larger open space easements adjoining and/or integrated within the wetlands and wetland buffers. All wetlands and wetland buffers would be included within the dedicated Area A open space.

The MSCP does not include any guidance regarding wetland buffers, and the MSCP does not apply to this area. The project area is within the future draft NCMSCP area; the draft NCMSCP does include a section on wetland buffers that is based upon the County RPO. The applicable portion states, “wider buffers (100-200+ feet) are more appropriate for higher quality wetlands such as those

within regional wildlife corridors, wetlands adjacent to PAMA, or wetlands that support significant populations of sensitive species. Areas occupied by pond turtles or arroyo toads require a 200-foot buffer." No pond turtles or arroyo toads are present in these upland tributaries. Survey results indicate that there are no significant populations of sensitive species or regional wildlife corridor through Area A (the regional corridors are in Area B to the north and east). Therefore, the project has incorporated appropriate wetland buffers in Area A. The wetland buffers exceed the 200 feet in Areas B and C.

As noted in the Final EIR, trails would be adjusted outside the required wetland buffer where feasible as determined through a location study to be done in conjunction with the RMP. Final trail location would incorporate recommendations of the designated resource manager and be to the satisfaction of the County Department of Parks and Recreation.

Since the response was previously provided, the FEIR has been updated to more fully describe the trail alignments relative to wetland areas and buffers. This updated response replaces the above paragraph: As noted in the FEIR, the trail in Area A is located away from wetlands and wetland buffers and the alignment for the future trail in Area B will be adjusted away from the wetland buffer where feasible as determined through a location study done prior to approval of the Final Map. See response to comment A-11.

B-29

The Conceptual Revegetation Plan that provides for onsite restoration and enhancement of impacted wetlands was included as Appendix D to the Draft EIR. While the Conceptual Revegetation Plan indicated 3 years of monitoring, the conditions of approval will require a 5-year monitoring and maintenance program consistent with County Guidelines (see Appendix C, Final Revegetation Plan Requirements). The Final Revegetation Plan will be in consistent with the Draft EIR mitigation, BRT, and San Diego County Department of Parks and Recreation's Area Specific Management Directives for the Ramona Grasslands Preserve.

B-30

The biological technical and wetland delineation reports provided more details on the methodology of the wetland determination. The Wetland Delineation Report is included as Appendix A of the Biological Technical Report (Appendix B of the EIR). The applicant will provide an updated wetland delineation and impact analysis for the required Section 1600 Agreements once the project has completed the CEQA process and pre-final engineering plans are completed. No vernal pools or their watersheds will be impacted.

B-31

The eastern culvert is currently a triple 4x8-foot box culvert. This drainage facility will be lengthened to accommodate the widening of Highland Valley Road but will remain the same size. The western 36-inch culvert will be replaced with a new triple 4x8-foot box culvert with directional fencing. The central 3x1.5-foot box culvert will be lengthened but not increased in size. Both the western and eastern box culverts will support medium- and small-sized wildlife movement between the connecting open space lots on either side of Highland Valley Road. Larger-sized animals (deer, mountain lion) will continue to cross the road at night, but since the road is straight and has good line-of-sight they will be at low risk. The central culvert is not proposed to be enlarged because it does not facilitate wildlife movement and is within proposed development areas, draining a small area at the rear of the residential lots located south of Highland Valley Road with no connection to open space south of Highland Valley Road.

Additional replacement or enlargement of culverts located offsite is not proposed. No established corridors or linkages are within the immediate vicinity along Highland Valley Road. The feasibility of expansion of existing culverts offsite is limited due to existing hydrology, roadway geometrics, utility interference, and availability of necessary easements.

upgraded to a minimum triple 4x8 culverts or greater to improve wildlife movement between on-site open space areas and Areas B and C, which would contribute to the Ramona Grasslands Preserve.

B-32 The Department appreciates the opportunity to comment on the Draft EIR and HLP findings. If you have any questions regarding this letter, please contact Randy Rodriguez ([858] 637-7100/RFRodriguez@dfg.ca.gov) or David Mayer ([858] 467-4234/DMayer@dfg.ca.gov).

Sincerely,

Stephen M. Juarez
Environmental Program Manager
California Department of Fish and Game

B-33 Attachment: 1. Previous NOP comment letter (April 26, 2004)
2. Conceptual Relocation of Residential Lots (Lots 101-109 only)

cc: State Clearinghouse, Sacramento
Randy Rodriguez, DFG, San Diego
David Mayer, DFG, San Diego

B-32
Closing comments noted. No response is necessary.

B-33
Attachment 1 includes a previous letter from CDFG on the Cumming Ranch NOP and Attachment 2 supports Comment A-3. No response is necessary.

Attachment 1

chron file

U.S. Fish and Wildlife Service
Carlsbad Fish and Wildlife Office
6010 Hidden Valley Road
Carlsbad, California 92009
(760) 431-9440
FAX (760) 431-9624

California Department of Fish & Game
South Coast Region
4949 Viewridge Avenue
San Diego, California 92123
(858) 467-4201
FAX (858) 467-4299

In Reply Refer to:
FWS-SDG-3984.1 / CDFG 2004-0308-R5

Ms. Lori Spar
County of San Diego, Department of Planning and Land Use
5201 Ruffin Road, Suite B
San Diego, California 92123-1666

APR 26 2004

Re: Notice of Preparation of an Environmental Impact Report for Cumming Ranch Specific Plan (TM 5344, GPA 03-007, SP 03-005) (SCH2004031136)

Dear Ms. Spar:

The California Department of Fish and Game (Department) and U.S. Fish and Wildlife Service, collectively the Wildlife Agencies, have reviewed the Notice of Preparation (NOP) for the Environmental Impact Report for the Cumming Ranch Specific Plan in the Ramona Region of the unincorporated area of San Diego County. We have concerns regarding the potential effects of this project on native plant communities and wildlife.

Fish and Game Code Section 1802 establishes the Department's jurisdiction over conservation, protection, and management of fish, wildlife, native plants, and habitats necessary for biologically sustainable populations. The Department is a Trustee Agency and a Responsible Agency pursuant to the California Environmental Quality Act (CEQA), Sections 15386 and 15381 respectively. As a Trustee Agency, the Department must be consulted by the Lead Agency during the preparation and public review for project-specific CEQA documents. The Department is responsible for the conservation, protection, and management of the State's biological resources, including rare, threatened, and endangered plant and animal species, pursuant to the California Endangered Species Act (CESA). A CESA Permit (Section 2081 of the Fish and Game Code) must be obtained if the project has the potential to result in "take" of species of plants or animals listed under CESA, either during construction or over the life of the project. CESA Permits are issued to conserve, protect, enhance, and restore State-listed threatened or endangered species and their habitats. Early consultation is encouraged, as significant modification to a project and mitigation measures may be required to obtain a CESA Permit.[1] The Department also administers the Natural Community Conservation Planning (NCCP) program. The project lies within the North County Multiple Species Conservation Program (NC MSCP) planning area.

1 Revisions to the Fish and Game Code, effective January 1998, may require that the Department issue a separate CEQA document for the issuance of a 2081 permit unless the project CEQA document addresses all project impacts to listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of a 2081 permit. For these reasons, the:
   a. biological mitigation monitoring and reporting proposals should be of sufficient detail and resolution to satisfy the requirements for a CESA Permit, and
   b. a Department-approved Mitigation Agreement and Mitigation Plan are required for plants listed as rare under the Native Plant Protection Act.

The primary concern and mandate of the Service is the protection of public fish and wildlife resources and their habitats. The Service has legal responsibility for the welfare of migratory birds, anadromous fish, and endangered animals and plants occurring in the United States. The Service is also responsible for administering the Endangered Species Act of 1973, as amended (Act) (16 U.S.C. 1531 *et seq.*).

The Cumming Ranch Specific Plan is a proposed rural residential development and natural open space preservation project. Project elements include a General Plan Amendment (GPA 03-007), Specific Plan (SPA 03-005), and Tentative Map (TM 5344). The project proposes development of 136 residential lots on the 680-acre parcel; 155 acres of land are proposed to be preserved. Development of the Cumming Ranch Specific Planning Area (SPA) is designed to integrate the open space design with surrounding properties in order to provide appropriate resource protections and limited impacts to the current conditions of the site, particularly the biological and cultural resources within the SPA.

The 680-acre parcel is divided into three areas. Area A is the southernmost portion, where the 136 residential units, road improvements, and approximately 155 acres of open space are proposed. Area B is approximately 155 acres in size, and a 2.5 year Option to Purchase agreement will be made to the Ramona Grasslands Project. If that option is not exercised, up to 30 home sites would be proposed for development. Area C, approximately 113 acres in size including 22 acres under an existing conservation easement and referred to as the Ramona Vernal Pool Preserve, would be donated by the landowner in fee title to the Ramona Grassland Project.

Specific Comments

The Wildlife Agencies have met on site with the applicant and County staff to discuss possible project development siting options. Our primary concerns focused on ensuring that an acceptable configuration and amount of open space remains on site, and that the open space would connect to other existing or planned open space. Of particular note was that large blocks of open space be retained and connected by robust, functional natural habitat linkages.

The current conceptual site plan for the property (as provided with the NOP) shows several development "bubbles" that fragment the open space, significantly in the central-eastern portion of the project site. Because the lands to the east and north of this property have not proposed developments, the DEIR should analyze the potential for the project to affect open space configuration and connectivity within the larger Ramona grasslands area. Also, the project should minimize the creation of isolated pockets of development that increase the urban-wildland interface.

General Comments

To enable Department staff to adequately review and comment on the proposed project from the standpoint of the protection of plants, fish and wildlife, we recommend the following information be included in the DEIR:

1. A complete discussion of the purpose and need for, and description, of the proposed project, including all staging areas and access routes to the construction and staging areas.

2. A complete list and assessment of the flora and fauna within and next to the project area, with particular emphasis upon identifying State or federally listed rare, threatened, endangered, or proposed candidate species, California Species-of-Special Concern and/or State Protected or Fully Protected species, and any locally unique species and sensitive habitats. Specifically, the DEIR should include:

   a. A thorough assessment of Rare Natural Communities on site and within the area of impact, following the Department's Guidelines for Assessing Impacts to Rare Plants and Rare Natural Communities (revised May 8, 2000).

   b. A current inventory of the biological resources associated with each habitat type on site and within the area of impact. The Department's California Natural Diversity Data Base in Sacramento should be contacted at (916) 327-5960 to obtain current information on any previously reported sensitive species and habitat, including Significant Natural Areas identified under Chapter 12 of the Fish and Game Code. The Data Base is updated monthly, and therefore recommend that the project utilize a version of the Data Base that is no more than six months old.

   c. An inventory of rare, threatened, and endangered species on site and within the area of impact. Species to be addressed should include all those which meet the CEQA definition (see CEQA Guidelines, § 15380).

   d. Discussions regarding seasonal variations in use by sensitive species of the project site and area of impact on those species, and acceptable species-specific survey procedures as determined through consultation with the Wildlife Agencies. Focused species-specific surveys, conducted in conformance with established protocols at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, are required.

3. A thorough discussion of direct, indirect, and cumulative impacts expected to adversely affect biological resources. All facets of the project should be included in this assessment. Specifically, the DEIR should provide:

   a. Specific acreage and descriptions of the types of wetlands, coastal sage scrub, and other sensitive habitats that will or may be affected by the proposed project or project alternatives should be included. Maps and tables should be used to summarize such information.

   b. Discussions regarding the regional setting, pursuant to the CEQA Guidelines, Section15125(a), with special emphasis on resources that are rare or unique to the region that would be affected by the project. This discussion is critical to an assessment of environmental impacts.

c. Detailed discussions, including both qualitative and quantitative analyses, of the potentially affected listed and sensitive species (fish, wildlife, plants), and their habitats—on the proposed project site, area of impact, and alternative sites, including information pertaining to their local status and distribution. The anticipated or real impacts of the project on these species and habitats should be fully addressed.

d. Discussions regarding indirect project impacts on biological resources, including resources in nearby public lands, open space, adjacent natural habitats, riparian ecosystems, and any designated and/or proposed NCCP reserve lands. Impacts on, and maintenance of, wildlife corridor/movement areas, including access to undisturbed habitats in adjacent areas, should be fully evaluated and provided. A discussion of potential adverse impacts from lighting, noise, human activity, exotic species, and drainage. The latter subject should address: project-related changes on drainage patterns on and downstream of the project site; the volume, velocity, and frequency of existing and post-project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and post-project fate of runoff from the project site.

e. Discussions regarding possible conflicts resulting from wildlife-human interactions at the interface between the development project and natural habitats. The zoning of areas for development projects or other uses that are nearby or adjacent to natural areas may inadvertently contribute to wildlife-human interactions.

f. An analysis of cumulative effects, as described under CEQA Guidelines, Section15130. General and specific plans, and past, present, and anticipated future projects, should be analyzed concerning their impacts on similar plant communities and wildlife habitats.

g. An analysis of the effects that the project may have on the NC MSCP and consistency with the NCCP Conservation Guidelines. This analysis should focus on project impacts to local and regionally significant wildlife corridors, as well as on sensitive species/habitats anticipated to be covered by the NC MSCP.

4. Mitigation measures for adverse project-related impacts on sensitive plants, animals, and habitats. Mitigation measures should emphasize avoidance, and where avoidance is infeasible, reduction of project impacts. For unavoidable impacts, off-site mitigation through acquisition and preservation in perpetuity of the affected habitats should be addressed. The Department generally does not support the use of relocation, salvage, and/or transplantation as mitigation for impacts on rare, threatened, or endangered species. Studies have shown that these efforts are experimental in nature and largely unsuccessful.

This discussion should include measures to perpetually protect the targeted habitat values where preservation and/or restoration is proposed. The objective should be to offset the project-induced qualitative and quantitative losses of wildlife habitat values. Issues that should be addressed include restrictions on access, proposed land dedications, monitoring and management programs, control of illegal dumping, water pollution, control of invasive exotic species, increased human intrusion, etc. Plans for restoration and revegetation

should be prepared by persons with expertise in southern California ecosystems and native plant revegetation techniques. Each plan should include, at a minimum: (a) the location of the mitigation site; (b) the plant species to be used; (c) a schematic depicting the mitigation area; (d) time of year that planting will occur; (e) a description of the irrigation methodology; (f) measures to control exotic vegetation on site; (g) success criteria; (h) a detailed monitoring program; (i) contingency measures should the success criteria not be met; (j) identification of the entity(ies) that will guarantee achieving the success criteria and provide for conservation of the mitigation site in perpetuity.

Mitigation measures to alleviate indirect project impacts on biological resources must be included, including measures to minimize changes in the hydrologic regimes on site, and means to convey runoff without damaging biological resources, including the morphology of on-site and downstream habitats.

5. Descriptions and analyses of a range of alternatives to ensure that alternatives to the proposed project are fully considered and evaluated. The analyses must include alternatives that avoid or otherwise reduce impacts to sensitive biological resources. Specific alternative locations should be evaluated in areas of lower resource sensitivity where appropriate.

The Department has responsibility for the conservation of wetland and riparian habitats. It is the policy of the Department to strongly discourage development in wetlands. We oppose any development which would result in a reduction of wetland acreage or wetland habitat functions and values. At a minimum, project mitigation should assure there will be "*no net loss*" of wetland habitat acreage. Development includes but is not limited to conversion to subsurface drains, placement of fill or building of structures within the wetland, and channelization or removal of materials from the streambed. All wetlands and watercourses, whether intermittent or perennial, should be retained and provided with substantial setbacks which preserve the riparian and aquatic values and maintain their value to on-site and off-site wildlife populations.

If appropriate, a jurisdictional delineation of lakes, streams, and associated riparian habitats should be included in the EIR, including a wetland delineation pursuant to the U. S. Fish and Wildlife Service definition (Cowardin 1979) adopted by the Department. Please note that wetland and riparian habitats subject to the Department's authority may extend beyond the jurisdictional limits of the U.S. Army Corps of Engineers.

The proposed project may require a Lake or Streambed Alteration Agreement (SAA). The Department has direct authority under Fish and Game Code section 1600 *et. seq.* regarding any proposed activity that would divert, obstruct, or affect the natural flow or change the bed, channel, or bank of any river, stream, or lake. The Department's issuance of a SAA for a project that is subject to CEQA requires CEQA compliance actions by the Department as a Responsible Agency. As a Responsible Agency under CEQA, the Department may consider the County's (Lead Agency's) CEQA documentation. To minimize additional requirements by the Department pursuant to Section 1600 *et seq.* and/or under CEQA, the documentation should fully identify the potential impacts to the lake, stream or riparian resources and provide adequate

avoidance, mitigation, monitoring and reporting commitments for issuance of the agreement. A SAA notification form may be obtained by writing to the Department of Fish and Game, 4949 Viewridge Avenue, San Diego, California 92123-1662, or by calling (858) 636-3160, or by accessing the Department's web site at www.dfg.ca.gov/1600. The Department's SAA Program holds regularly scheduled pre-project planning/early consultation meetings. To make an appointment, please call our office at (858) 636-3160.

The proposed project does not appear to meet de minimus conditions in its effects on fish and wildlife per section 711.4 of the California Fish and Game Code.

The Wildlife Agencies appreciate the opportunity to comment on the NOP. We are available to work with the County and their consultants to obtain any necessary permits for the proposed project. Please contact David Mayer of the Department at (858) 467-4234 or Patricia Cole of the Service at (760) 431-9440 if you have any questions or comments concerning this letter.

Sincerely,

Therese O'Rourke
Assistant Field Supervisor
U.S. Fish and Wildlife Service

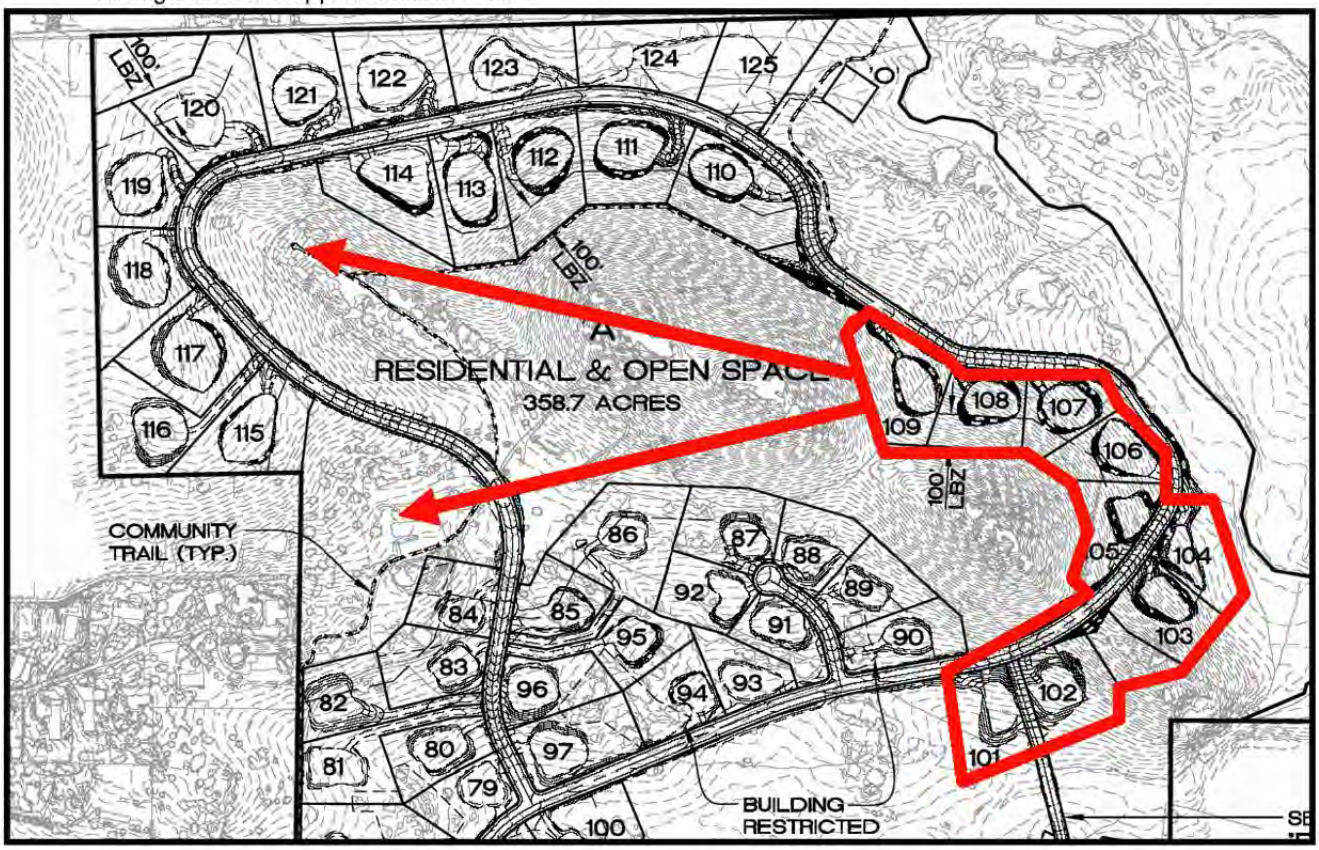
William E. Tippets
Deputy Regional Manager
South Coast Region

cc: State Clearinghouse

Literature Cited

Cowardin, Lewis M., V. Carter, G. C. Golet, and E. T. LaRoe. 1979. Classification of wetlands and deepwater habitats of the United States. Fish and Wildlife Service, U.S. Department of the Interior. U.S. Government Printing Office, Washington, D.C.

The figure below supports comment A3.



STATE OF CALIFORNIA—BUSINESS, TRANSPORTATION AND HOUSING AGENCY ARNOLD SCHWARZENEGGER, Governor

DEPARTMENT OF TRANSPORTATION
DISTRICT 11
PLANNING DIVISION
4050 TAYLOR STREET, MS 240
SAN DIEGO, CA 92110
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11-SD-67
PM 21.44
SCH2004031136

Mr. Kenneth Brazell
County of San Diego
Dept. of Planning and Land Use
5201 Ruffin Road, Suite B
San Diego, CA 92123-1666

Re: Draft Environmental Impact Report

Dear Mr. Brazell:

C-1 The California Department of Transportation (Caltrans) has reviewed the Draft Environmental Impact Report (DEIR) for the proposed Cummings Ranch project located at State Route 67 (SR-67) and Highland Valley/Dye Road. Caltrans would like to make the following comments:

C-2 The dimensions for the final design for SR-67and Highland Valley/Dye Road may be different than what is shown in the Draft Layout Plan submitted with the DEIR. It is recommended that specific length dimensions be removed. In addition, mitigation language within the DEIR for

C-3 impacts on state facilities needs to add "shall also be implemented to Caltrans satisfaction" to Mitigation Measures Impact TR-1a, TR-1b, TR-2a, TR-2b, TR-3a, TR-3b, TR-4, TR-5, TR-6, TR-7, TR-8, and TR-9. The analysis contains some discrepancies related to traffic volumes and analysis methods; However, Caltrans agrees with the mitigation being proposed.

C-4 Any work performed within Caltrans right-of-way (R/W) will require discretionary review and approval by Caltrans and an encroachment permit will be required for any work within the Caltrans' R/W prior to construction. Current policy allows Highway Improvement Projects costing $1 million or less to follow the Caltrans Encroachment Permit process. Highway Improvement Projects costing greater than $1 million but less than $3 million would be allowed to follow a streamlined project development process similar to the Caltrans Encroachment Permit process. In order to determine the appropriate permit processing of projects funded by others, it is recommended the concept and project approval for work to be done on the State Highway System be evaluated through the completion of a Permit Engineering Evaluation Report (PEER). A PEER should always be prepared, regardless of the cost of improvements, when new operating improvements are constructed by the permittee that become part of the State Highway System. These include but are not limited to, signalization, channelization, turn pockets, widening, realignment, public road connections, and bike paths and lanes. After approval of the PEER and necessary application and supporting documentation an encroachment permit can be issued. The PEER document forms and procedures can be found in the Caltrans Project Development Procedures Manual (PDPM). http://www.dot.ca.gov/hq/oppd/pdpm/pdpmn.htm
http://www.dot.ca.gov/hq/traffops/developserv/permits/pdf/forms/PEER_(TR-0112).pdf

"Caltrans improves mobility across California"

Letter C
Caltrans

C-1
Comment C-1 is an introduction to the comment letter. No response is necessary.

C-2
As requested, the specific length dimensions will be removed from the Draft Layout Plan and conditions of approval as the final design dimensions may be slightly different.

C-3
The requested, mitigation language "shall also be implemented to Caltrans satisfaction" will be added to Mitigation Measures (TR-1b and TR-7) where Caltrans satisfaction is not already specified and a direct improvement is required. The County acknowledges Caltrans agreement with the mitigation proposed in the Draft EIR.

C-4
The County acknowledges the information provided. Any work within Caltrans right-of-way will require discretionary review and approval by Caltrans and an Encroachment Permit. All procedures would be followed as required. Comment C-4 does not provide comment on the analysis provided in the Draft EIR and no additional response is necessary.

PEER reviews and approval of projects between $1 million to $3 million sponsored by private entities will require the execution of a Highway Improvement Agreement (HIA). Highway Improvement Projects greater than $3 million, or considered complex projects, would be required to adhere to the full Project Development Process (e.g. Project Initiation Documents/Project Study Reports), with the necessary Cooperative Agreement with a public agency, or HIA with a private project sponsor.

As part of the encroachment permit process, the applicant must provide an approved final environmental document including the California Environmental Quality Act (CEQA) determination addressing any environmental impacts within the Caltrans' R/W, and any corresponding technical studies. If these materials are not included with the encroachment permit application, the applicant will be required to acquire and provide these to Caltrans before the permit application will be accepted. Identification of avoidance and/or mitigation measures will be a condition of the encroachment permit approval as well as procurement of any necessary regulatory and resource agency permits. Encroachment permit submittals that are incomplete can result in significant delays in permit approval.

C-4 Cont

When a property owner proposes to dedicate property to a local agency for Caltrans use in conjunction with a permit project, Caltrans will not issue the encroachment permit until the dedication is made and the property has been conveyed to the Department.

Improvement plans for construction within State Highway R/W must include the appropriate engineering information consistent with the state code and signed and stamped by a professional engineer registered in the State of California. Caltrans Permit Manual contains a listing of typical information required for project plans. All design and construction must be in conformance with the Americans with Disabilities Act (ADA) requirements.

Additional information regarding encroachment permits may be obtained by contacting the Caltrans Permits Office at (619) 688-6158. Early coordination with Caltrans is strongly advised for all encroachment permits.

CEQA requires, under Public Resources Code (PRC) Section 21081.6, the adoption of reporting or monitoring programs when public agencies include environmental impact mitigation as a condition of project approval. Reporting or monitoring takes place after project approval to ensure implementation of the project in accordance with the mitigation adopted during the CEQA review process. According to PRC Section 21081.6, when a project has impacts that are of statewide, regional, or area-wide significance, a reporting or monitoring program shall be submitted to Caltrans.

C-5

C-5

As required by CEQA, the County would adopt a Mitigation, Monitoring, and Reporting Plan as part of CEQA approval for the project. This Mitigation, Monitoring, and Report Plan would be part of the Tentative Map Resolution and it will be provided to Caltrans at least 10 days prior to the public hearing to be considered as part of the project approval.

C-6 If you have any questions, please contact Christian Bushong of the Development Review Branch at (619) 688-6494 or email at christian.bushong@dot.ca.gov.

Sincerely,

JACOB M. ARMSTRONG, Chief
Development Review Branch

c: State Clearinghouse
Mark Linman, Land Use and Development Consulting

C-6
Closing statement noted. No response is necessary.

State of California Business, T portation and Housing Agency

M e m o r a n d u m

Date: December 6, 2010

RECEIVED
DEC 13 2010
STATE CLEARING HOUSE

To: State Clearinghouse
1400 Tenth Street, Room 121
Sacramento, CA 95814

Clear 12/20/10 e

From: **DEPARTMENT OF CALIFORNIA HIGHWAY PATROL**
El Cajon Area

File No.: 680.11796.12790

Subject: ENVIRONMENTAL DOCUMENT REVIEW AND RESPONSE
SCH#2004031136

D-1 Thank you for the opportunity to review the "Notice of Completion" environmental document for the Cumming Ranch Project, State Clearinghouse (SCH) #2004031136. The California Highway Patrol (CHP) is the primary agency that provides traffic law enforcement, safety, and management on the freeways and unincorporated portions of the county. The CHP El Cajon Area is responsible for State Route (SR) 67 in the immediate vicinity of this project. We offer the following comments:

D-2 The project site is located approximately ¼ mile northwest of the intersection of SR-67 and Highland Valley Road, within the unincorporated area of San Diego County. It is projected that this project will cause an increase in traffic, which is substantial in relation to the existing traffic load and capacity of the currently configured street and highway system, and an increase in vehicle trips, and the volume to capacity ratio on roads, or congestion at the intersections. The proposed construction of 125 single family residential units is estimated to generate an additional 200 plus average daily automobile trips (ADT), not to mention the significant increase in truck traffic during and after construction, to the existing traffic flow on SR-67. I would recommend further consideration on this project from a traffic safety standpoint.

D-3 If you should have any questions concerning this matter and these comments, please contact Lieutenant Mike Berger (619) 401-2000.

L. WROBEL, Captain
Commander
El Cajon Area

cc: Border Division
Special Project Section

Safety, Service, and Security

CHP 51WP (Rev. 11-86) OPI 076

Letter D
California Highway Patrol El Cajon Area

D-1
The County acknowledges the California Highway Patrol El Cajon Area jurisdiction within the immediate project vicinity. This comment does not raise a specific issue regarding the environmental analysis provided in the Draft EIR and no response is necessary.

D-2
The comment states that traffic generated by the Cumming Ranch project would add substantial traffic to SR 67 and the currently configured street system. The analysis of the project-related traffic volume is provided in Section 2.1.3 of the Draft EIR. Significant traffic impacts were identified and multiple mitigation measures have been provided in Section 2.1.5. Section 2.1.3 also includes an analysis of traffic safety and no significant safety impacts were identified. Construction traffic is discussed in Section 7.2 of the Traffic Study (Appendix A). It is estimated that the number of trips associated with construction activities will be 310 ADT. This is substantially less than the project-generated traffic volumes and it will also be less than significant.

This project and all projects are required to apply for a County of San Diego Traffic Control Permit (TCP) for construction work within or near County ROWs where traffic operations may be affected. A County construction and/or encroachment permit may also be required. The TCP will likely include a Traffic Control Plan with traffic measures and details that will be implemented to ensure that traffic operations on public roads (including motorists, pedestrians, and bicyclists) during construction are adequately addressed, and may exceed measures found in standard government manuals for traffic control.

D-3
Closing statement noted. No response is necessary.

State of California Business, Transp tion and Housing Agency

Memorandum

RECEIVED
DEC 13 2010
STATE CLEARING HOUSE

Date: November 9, 2010

To: El Cajon Area (680)

From: **DEPARTMENT OF CALIFORNIA HIGHWAY PATROL**
Special Projects Section

File No.: 063.A07471.noc.doc

Subject: ENVIRONMENTAL DOCUMENT REVIEW AND RESPONSE
SCH#2004031136

Special Projects Section (SPS) recently received a "Notice of Completion" environmental document from the State Clearinghouse outlining the information contained in the attached profile.

After a preliminary review, we believe this project will not have a significant impact on statewide departmental operations. However, because of your geographical proximity to the site, you are in a better position to provide a more accurate assessment of any traffic-related matters that may affect your local Area operations. Information and procedures outlined in the *Transportation Planning Manual,* HPM 41.1, Chapter 6, "Environmental Impact Documents," should serve as a guideline when reviewing transportation-related documents.

E-1

If you determine departmental input is advisable, please provide your written comments referencing the above SCH number to the State Clearinghouse, 1400 Tenth Street, Room 121, Sacramento, CA 95814. Your comments must be received no later than December 20, 2010. Please forward a copy of your written comments to SPS.

If you have any questions, please call Special Projects Section at (916) 843-3370.

R. M. NANNINI, SSM III
Commander

E-2 Attachment

cc: Border Division
Assistant Commissioner, Field

Safety, Service, and Security

CHP 51 WP (Rev. 11-86) OPI 076

Letter E
CHP Special Projects Section Responses

E-1
Comment E-1 states that preliminary review of the Draft EIR Notice of Completion found no significant impacts on statewide departmental operations. As noted in this comment, the California Highway Patrol El Cajon Area provided a comment letter (Letter D) based on their local proximity to the project. No additional comments regarding the analysis provided in the Draft EIR are provided and no additional response is necessary.

E-2
The attachment provides the letter received from the State Clearinghouse. The State Clearinghouse letter is included independently in this response to comments document as Letter F. No response is necessary.

STATE OF CALIFORNIA

Governor's Office of Planning and Research

State Clearinghouse and Planning Unit

Arnold Schwarzenegger
Governor

Cathleen Cox
Acting Director

December 21, 2010

RECEIVED
DEC 27 2010
DPLU - PPCC

Larry Hofreiter
San Diego County
5201 Ruffin Road, Suite B
San Diego, CA 92123-1666

Subject: Cumming Ranch Specific Plan
SCH#: 2004031136

Dear Larry Hofreiter:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on December 20, 2010, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

> "A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Enclosures
cc: Resources Agency

1400 TENTH STREET P.O. BOX 3044 SACRAMENTO, CALIFORNIA 95812-3044
TEL (916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

Document Details Report
State Clearinghouse Data Base

SCH# 2004031136
Project Title Cumming Ranch Specific Plan
Lead Agency San Diego County

Type EIR Draft EIR

Description The project is a major subdivision of 682.2-acres into 125 single family residential lots and an open space preserve approximately 457-acres in size. The project involves a General Plan Amendment, Specific Plan, Tentative Map, Site Plan and Rezone.

Lead Agency Contact

Name Larry Hofreiter
Agency San Diego County
Phone (858) 694-8846 **Fax**
email
Address 5201 Ruffin Road, Suite B
City San Diego **State** CA **Zip** 92123-1666

Project Location

County San Diego
City
Region
Lat / Long 33° 1' 5.9" N / 116° 54' 59.2" W
Cross Streets Highland Valley Road and SR-67
Parcel No. 282-010-30, -43; 283-011-06; 283-021-01, -02; 283-022-02; 283-041-03, -09; 238-051-01
Township **Range** **Section** **Base**

Proximity to:

Highways SR 67 and SR 78
Airports Ramona Air Center
Railways
Waterways Santa Maria and Etcheverry Creek
Schools Ramona Unified School District
Land Use The Cumming Ranch project site is currently undeveloped. It is within the Estate Development Area (EDA) and Environmentally Constrained Area (ECA) regional categories. The General Plan designates the area as a (21) Specific Plan Area with an S-88 (Specific Plan) zoning designation.

Project Issues Aesthetic/Visual; Agricultural Land; Air Quality; Archaeologic-Historic; Biological Resources; Drainage/Absorption; Flood Plain/Flooding; Forest Land/Fire Hazard; Noise; Public Services; Recreation/Parks; Sewer Capacity; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Wildlife; Landuse; Cumulative Effects

Reviewing Agencies Resources Agency; Department of Conservation; Department of Fish and Game, Region 5; Cal Fire; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; California Highway Patrol; Caltrans, District 11; Air Resources Board, Transportation Projects; Regional Water Quality Control Board, Region 9; Native American Heritage Commission; Caltrans, Division of Aeronautics

Date Received 11/05/2010 **Start of Review** 11/05/2010 **End of Review** 12/20/2010

Note: Blanks in data fields result from insufficient information provided by lead agency.

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit

Arnold Schwarzenegger
Governor

Cathleen Cox
Acting Director

December 21, 2010

RECEIVED
DEC 27 2010
DPLU - PPCC

Larry Hofreiter
San Diego County
5201 Ruffin Road, Suite B
San Diego, CA 92123-1666

Subject: Cumming Ranch Specific Plan
SCH#: 2004031136

Dear Larry Hofreiter:

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Please note that Section 21104(c) of the California Public Resources Code states that:

F-1

> "A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

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Sincerely,

Scott Morgan
Director, State Clearinghouse

Enclosures
cc: Resources Agency

1400 TENTH STREET P.O. BOX 3044 SACRAMENTO, CALIFORNIA 95812-3044
TEL (916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

Letter F
State Clearinghouse Responses

F-1
Comment F-1 provides an explanation of the State Clearinghouse submittal of the Draft EIR to select agencies for review and acknowledges that State Clearinghouse review requirements have been met. No response is necessary.

Document Details Report
State Clearinghouse Data Base

F-1 Cont

SCH# 2004031136
Project Title Cumming Ranch Specific Plan
Lead Agency San Diego County

Type EIR Draft EIR

Description The project is a major subdivision of 682.2-acres into 125 single family residential lots and an open space preserve approximately 457-acres in size. The project involves a General Plan Amendment, Specific Plan, Tentative Map, Site Plan and Rezone.

Lead Agency Contact

Name Larry Hofreiter
Agency San Diego County
Phone (858) 694-8846 **Fax**
email
Address 5201 Ruffin Road, Suite B
City San Diego **State** CA **Zip** 92123-1666

Project Location

County San Diego
City
Region
Lat / Long 33° 1' 5.9" N / 116° 54' 59.2" W
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Parcel No. 282-010-30, -43; 283-011-06; 283-021-01, -02; 283-022-02; 283-041-03, -09; 238-051-01
Township **Range** **Section** **Base**

Proximity to:

Highways SR 67 and SR 78
Airports Ramona Air Center
Railways
Waterways Santa Maria and Etcheverry Creek
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Reviewing Agencies Resources Agency; Department of Conservation; Department of Fish and Game, Region 5; Cal Fire; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; California Highway Patrol; Caltrans, District 11; Air Resources Board, Transportation Projects; Regional Water Quality Control Board, Region 9; Native American Heritage Commission; Caltrans, Division of Aeronautics

Date Received 11/05/2010 **Start of Review** 11/05/2010 **End of Review** 12/20/2010

Note: Blanks in data fields result from insufficient information provided by lead agency.

STATE OF CALIFORNIA—BUSINESS, TRANSPOI ON AND HOUSING AGENCY ARNOLD SCHWARZENEGGER, Governor

DEPARTMENT OF TRANSPORTATION
DISTRICT 11
PLANNING DIVISION
4050 TAYLOR STREET, MS 240
SAN DIEGO, CA 92110
PHONE (619) 688-6960
FAX 711

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Flex your power!
Be energy efficient!

December 1, 2010

11-SD-67
PM 21.44
SCH2004031136

Mr. Kenneth Brazell
County of San Diego
Dept. of Planning and Land Use
5201 Ruffin Road, Suite B
San Diego, CA 92123-1666

Clear
12/20/10
e

Re: Draft Environmental Impact Report

Dear Mr. Brazell:

The California Department of Transportation (Caltrans) has reviewed the Draft Environmental Impact Report (DEIR) for the proposed Cummings Ranch project located at State Route 67 (SR-67) and Highland Valley/Dye Road. Caltrans would like to make the following comments:

F-2

The dimensions for the final design for SR-67and Highland Valley/Dye Road may be different than what is shown in the Draft Layout Plan submitted with the DEIR. It is recommended that specific length dimensions be removed. In addition, mitigation language within the DEIR for impacts on state facilities needs to add "shall also be implemented to Caltrans satisfaction" to Mitigation Measures Impact TR-1a, TR-1b, TR-2a, TR-2b, TR-3a, TR-3b, TR-4, TR-5, TR-6, TR-7, TR-8, and TR-9. The analysis contains some discrepancies related to traffic volumes and analysis methods; However, Caltrans agrees with the mitigation being proposed.

Any work performed within Caltrans right-of-way (R/W) will require discretionary review and approval by Caltrans and an encroachment permit will be required for any work within the Caltrans' R/W prior to construction. Current policy allows Highway Improvement Projects costing $1 million or less to follow the Caltrans Encroachment Permit process. Highway Improvement Projects costing greater than $1 million but less than $3 million would be allowed to follow a streamlined project development process similar to the Caltrans Encroachment Permit process. In order to determine the appropriate permit processing of projects funded by others, it is recommended the concept and project approval for work to be done on the State Highway System be evaluated through the completion of a Permit Engineering Evaluation Report (PEER). A PEER should always be prepared, regardless of the cost of improvements, when new operating improvements are constructed by the permittee that become part of the State Highway System. These include but are not limited to, signalization, channelization, turn pockets, widening, realignment, public road connections, and bike paths and lanes. After approval of the PEER and necessary application and supporting documentation an encroachment permit can be issued. The PEER document forms and procedures can be found in the Caltrans Project Development Procedures Manual (PDPM). http://www.dot.ca.gov/hq/oppd/pdpm/pdpmn.htm
http://www.dot.ca.gov/hq/traffops/developserv/permits/pdf/forms/PEER_(TR-0112).pdf

Caltrans improves mobility across California"

F-2
This comment includes the attachments accompanying the State Clearinghouse letter. The attachments include three comment letters received by the State Clearinghouse. Each of the three attached letters has been addressed as independently numbered responses to comments. Please see Caltrans (Letter C), California Highway Patrol El Cajon Area (Letter D), and California Highway Patrol Special Projects Section (Letter E). Thus, no responses are provided here.

F-2 Cont

PEER reviews and approval of projects between $1 million to $3 million sponsored by private entities will require the execution of a Highway Improvement Agreement (HIA). Highway Improvement Projects greater than $3 million, or considered complex projects, would be required to adhere to the full Project Development Process (e.g. Project Initiation Documents/Project Study Reports), with the necessary Cooperative Agreement with a public agency, or HIA with a private project sponsor.

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Additional information regarding encroachment permits may be obtained by contacting the Caltrans Permits Office at (619) 688-6158. Early coordination with Caltrans is strongly advised for all encroachment permits.

CEQA requires, under Public Resources Code (PRC) Section 21081.6, the adoption of reporting or monitoring programs when public agencies include environmental impact mitigation as a condition of project approval. Reporting or monitoring takes place after project approval to ensure implementation of the project in accordance with the mitigation adopted during the CEQA review process. According to PRC Section 21081.6, when a project has impacts that are of statewide, regional, or area-wide significance, a reporting or monitoring program shall be submitted to Caltrans.

If you have any questions, please contact Christian Bushong of the Development Review Branch at (619) 688-6494 or email at christian.bushong@dot.ca.gov.

Sincerely,

JACOB M. ARMSTRONG, Chief
Development Review Branch

c: State Clearinghouse
Mark Linman, Land Use and Development Consulting

F-2
Cont

State of California Business, T :portation and Housing Agency

M e m o r a n d u m

Date: December 6, 2010

RECEIVED
DEC 13 2010
STATE CLEARING HOUSE

To: State Clearinghouse
1400 Tenth Street, Room 121
Sacramento, CA 95814

Clear 12/20/10 e

From: **DEPARTMENT OF CALIFORNIA HIGHWAY PATROL**
El Cajon Area

File No.: 680.11796.12790

Subject: ENVIRONMENTAL DOCUMENT REVIEW AND RESPONSE
SCH#2004031136

F-2 Cont

Thank you for the opportunity to review the "Notice of Completion" environmental document for the Cumming Ranch Project, State Clearinghouse (SCH) #2004031136. The California Highway Patrol (CHP) is the primary agency that provides traffic law enforcement, safety, and management on the freeways and unincorporated portions of the county. The CHP El Cajon Area is responsible for State Route (SR) 67 in the immediate vicinity of this project. We offer the following comments:

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If you should have any questions concerning this matter and these comments, please contact Lieutenant Mike Berger (619) 401-2000.

L. WROBEL, Captain
Commander
El Cajon Area

cc: Border Division
Special Project Section

Safety, Service, and Security

CHP 51WP (Rev. 11-86) OPI 076

State of California Business, Transp tion and Housing Agency

M e m o r a n d u m

RECEIVED
DEC 13 2010
STATE CLEARING HOUSE

Date: November 9, 2010

To: El Cajon Area (680)

From: **DEPARTMENT OF CALIFORNIA HIGHWAY PATROL**
Special Projects Section

File No.: 063.A07471.noc.doc

Subject: ENVIRONMENTAL DOCUMENT REVIEW AND RESPONSE
SCH#2004031136

F-2
Cont

Special Projects Section (SPS) recently received a "Notice of Completion" environmental document from the State Clearinghouse outlining the information contained in the attached profile.

After a preliminary review, we believe this project will not have a significant impact on statewide departmental operations. However, because of your geographical proximity to the site, you are in a better position to provide a more accurate assessment of any traffic-related matters that may affect your local Area operations. Information and procedures outlined in the *Transportation Planning Manual,* HPM 41.1, Chapter 6, "Environmental Impact Documents," should serve as a guideline when reviewing transportation-related documents.

If you determine departmental input is advisable, please provide your written comments referencing the above SCH number to the State Clearinghouse, 1400 Tenth Street, Room 121, Sacramento, CA 95814. Your comments must be received no later than December 20, 2010. Please forward a copy of your written comments to SPS.

If you have any questions, please call Special Projects Section at (916) 843-3370.

R. M. NANNINI, SSM III
Commander

Attachment

cc: Border Division
Assistant Commissioner, Field

Safety, Service, and Security

CHP 51WP (Rev. 11-86) OPI 076

RAMONA COMMUNITY PLANNING GROUP
15873 HWY 67, RAMONA, CALIFORNIA 92065
Phone: (760)803-2001

December 20, 2010

Larry Hofreiter, Project Manager
Department of Planning and Land Use
5201 Ruffin Road, Suite B
San Diego, CA 92123

RE: TM 5344, GPA 03-007, SP 03-005, STP 10-007, REZ 07-002, Cumming Ranch Project Draft Environmental Impact Report, General Plan Amendment Report, Specific Plan, and Draft Habitat Loss Permit

G-1 The Ramona Community Planning Group (RCPG) reviewed the Cumming Ranch Draft Environmental Impact Report (DEIR) and related documents at the meeting December 2, 2010. Eight people spoke against the project, and 2 people registered opposition but did not wish to speak. Four letters were received in opposition to the project as proposed, and are attached. The following motions were made:

MOTION: TO APPROVE THE DRAFT EIR.
The motion **passed 8-3-0-0-3,** with 3 members voting no and 3 members absent.

G-2 **MOTION: HAVE COUNTY DEPARTMENT OF PUBLIC WORKS WORK WITH CALTRANS AND THE COMMUNITY TO ADDRESS THE INADEQUACY OF THE SR 67/HIGHLAND VALLEY ROAD/DYE ROAD INTERSECTION AND THE SEGMENT OF SR 67 FROM HIGHLAND VALLEY ROAD/DYE ROAD TO MUSSEY GRADE ROAD AND DEVISE A PLAN FOR RESOLUTION AS IT WOULD RELATE TO PRESENT AND FUTURE GROWTH.**
The motion **passed 12-0-0-0-3,** with 3 members absent.

MOTION: TO SEND COMMENTS.
The motion **passed 12-0-0-0-3,** with 3 members absent.

Comments by the RCPG:

G-3 - The project will give back to the community with the improvements they will be making – trails, roads improvements, staging area, park land, etc.

G-4 - As concerns density, the project is near the Sawday and El Sol communities, with one-half acre and 1 acre lots.

Letter G
Ramona Community Planning Group

G-1
Comment G-1 includes introductory comments and explanation of the Ramona Community Planning Group vote to approve the Cumming Ranch Draft EIR. No response is necessary.

G-2
The County of San Diego has included Caltrans in the process of analyzing and developing mitigation (see Caltrans Comment Letter C) for impacts resulting from the proposed project as well as cumulative development at the SR 67/Highland Valley Road/Dye Road intersection and the SR 67 corridor from Highland Valley Road to Mussey Grade Road. Improvements to the intersection are proposed as part of the Cumming Ranch project and also required as mitigation. Mitigation Measures TR-2a and TR-7 of the Draft EIR address the direct and cumulative impacts to the intersection. Mitigation Measures TR-1b and TR-3b of the Draft EIR address the direct and cumulative impacts to SR 67 roadway segments between Mussey Grade Road and Highland Valley Road. As detailed in Section 2.1.6 of the Draft EIR, with implementation of the proposed mitigation, the direct and cumulative impacts to the intersection were found to be mitigated to less than significant and acceptable operating conditions would result. Caltrans has reviewed the intersection design and agrees with the proposed intersection improvements. See Comment Letter C.

G-3
The comment regarding the project's benefits to the community is noted. No issue related to the adequacy of the Draft EIR is raised in the comment and no response is necessary.

G-4
The comments describing surrounding Ramona neighborhoods are noted. No issue related to the adequacy of the Draft EIR is raised in the comment and no response is necessary.

G-4 cont - In the San Diego Country Estates, there are one-half acre lots and lots of animals and trails.

G-5 - Lots are too small for the rural character and to be consistent with large adjacent parcels. A 5-acre minimum lot size would fit the area better than what is currently proposed.

G-6 Agricultural use is encouraged on open space as is allowed in the current General Plan, rather than grassland use. The Cumming Ranch development should have the perimeter

G-7 visual buffer areas from surrounding parcels of similar magnitude as the Montecito

G-8 Ranch project. The Ramona Community Plan does not support clustering.

G-9 - This area is the gateway to Ramona. A visual buffer to lessen visual impacts from the project for people traveling/commuting on Hwy 67 is desirable.

G-10 - Request that the right turn lane be extended going north on Hwy 67 toward Dye Rd.

G-11 - We would like to know if the current alignment of the SA 330 is to run through open space lots B and C? If so, this should be considered in the DEIR for potential impacts to lots B and C.

G-12 - We would like to how many feet will come off the Highland Valley Road intersection by the Welcome Monument?

G-13 - We are surprised no improvements are being made to the north side of the Highland Valley/Dye intersection as the project will directly impact this intersection providing access to Hwy 67 for residents.

Comments by the Public:

G-14 - Request for a right turn lane from Highland Valley Road to Hwy 67 that extends onto Hwy 67 and then merges with southbound traffic.

- Request for a right turn only lane from Dye to northbound Hwy 67.

G-15 - There are concerns about odors from wastewater processing. No measurement of levels could be found in the DEIR.

G-16 - There is significant drainage onto Voorhes Lane when it rains. There is a concern that with the addition of residences, there will be more runoff, especially if the ground is disturbed. A buffer of 20 feet along Voorhes is recommended to prevent drainage from the project onto Voorhes Lane.

G-17 - There will be fencing along Voorhes as part of the project. There were questions on where the fence would go and what type of fence would it be?

G-18 - In the past, cows have eaten the grass down along Voorhes Lane, creating a major mud flow over Voorhes when it rains. There is a concern the same effect will be created with the addition of houses.

G-19 - There was a suggestion to plant oaks in a row to help screen the project from the Voorhes Lane community.

G-20 - There was a suggestion to have larger lots along Voorhes Lane, Highland Valley Road and Hwy 67 neighbors (10 acres) so that the lots will blend with the existing community, and lots will perc so sewer won't be necessary.

G-21 - There was a request for photo simulations to show what the project aesthetics/visual impacts will look like to Voorhes Lane residents.

G-22 - A map was approved by the RCPG in 2005 pending an acceptable EIR. The project map for 2010 is not one that was approved in 2005 which had 5-6 acre lots along Voorhes Lane – not 2 acre lots as in the 2010 map. This is not a reasonable transition and will

G-5

The comment states that the lots are too small and need to be consistent with large adjacent parcels; however, there is not a specific comment related to the Draft EIR. The commenter's opinion is acknowledged and is included in the project's preliminary Final EIR for the decision makers to consider. The County of San Diego acknowledges that there are lots surrounding portions of the project site that are 5 acres or larger in size. However, there are also many smaller residential lots in the immediate area (noted in previous comment G-4), as well as the adjacent Ramona Town Center. Land Use, Section 4.1.4 of the Draft EIR, provides an analysis of the compatibility of the project with the surrounding community, including the adjacent Ramona Town Center and rural residential lots within the vicinity of the project site. While the Cumming Ranch project would introduce a development that is denser than some of the surrounding rural residential lots, the project is generally compatible with the surrounding area and is consistent with the planned growth for the Ramona community.

G-6

The comment states that agricultural use should be encouraged in the open space lots; however, there is not a specific comment related to the Draft EIR. The commenter's opinion is acknowledged and is included in the project's preliminary Final EIR for the decision makers to consider. Agricultural use within the open space of Area B would continue in the immediate term as specified in the Open Space Component of Section 1.1.2 of the Draft EIR. Ongoing future agricultural use within the open space is possible, dependent upon the long-term resource management strategy determined by the County or conservation entity.

G-7

The comment states that the project should have a perimeter visual buffer from other large-scale projects; however, there is not a specific comment related to the Draft EIR. The commenter's opinion is acknowledged and is included in the project's preliminary Final EIR for the decision makers to consider. The Draft EIR found visual impacts from the proposed project were less than significant. The project includes open space buffering in character with the Ramona Grasslands to the north and estate residential development to the south and west.

G-8

The comment states that the RCPG does not support clustering; however, there is not a specific comment related to the Draft EIR. The Cumming Ranch project does not proposed clustered development. The residential lot design has been developed to fit into the natural terrain and has not been designed as clustered development. A Clustered Development Alternative was analyzed in Section 5.4 and was found to have more potential impacts than the proposed project and is not the preferred alternative.

G-9
The comment states that the project area is a gateway to Ramona; however, the comment does not address the visual analysis provided in the Draft EIR. While it is true that the visual environment of the project site would be altered by the project, the Draft EIR determined that visual impacts from the proposed project to motorists on SR 67 would be less than significant with mitigation incorporated to address potential noise wall. Views from SR 67 were considered in Key Views 1 and 2 as described in Section 3.4 of the Draft EIR and shown in the visual simulations provided in Figures 3.4-3 and 3.4-4. The project has been designed with large open space lots (Lots A and B) between SR 67 and planned development that would minimize the future view of residences from the roadway. Physical features onsite, such as trees, boulders, etc., are incorporated into the design of the residential lots. Major ridgelines, larger groups of rock outcroppings, heavily wooded areas, and major drainage areas on the property would be preserved and included within open space or building restricted areas. The use of native plantings within the landscape plan is intended to allow the project to integrate more seamlessly with the adjoining preserve areas. These and other features of the design further reduce the visual impacts of the project and views of the scenic vistas from SR 67 would be maintained. Some visual buffering from SR 67 would be afforded by the wetland mitigation along the drainage between SR 67 and the area of development south of Highland Valley Road as shown in Figures 3, 4a, and 4b of the Conceptual Revegetation Plan, which is Appendix D of the Draft EIR.

G-10
The commenter's opinion related to the length of the existing right-turn lane from eastbound SR 67 to southbound Dye Road is acknowledged and the length has been increased as seen in Figure 1.8 in the Final EIR. The mitigation at the intersection would improve the capacity, reduce vehicle queues, and accommodate future traffic volumes to acceptable intersection operations per County LOS standards.

G-11
The comment requests information regarding the future alignment of SA 330. The portion of the future SA 330 roadway that formerly was placed through Areas B and C has been deleted from the County Circulation Element and, therefore, future right-of-way has been eliminated from the project plans.

G-12
The comment requests information related to the space needed for the Welcome Monument. The widening at the curb return on Highland Valley Road is approximately 8.5 feet, with approximately 9 feet of additional right-of-way. On SR 67, the widening is 12 feet with no additional right-of-way required.

G-13
The comment requests information about the Highland Valley/Dye intersection with SR 67. Mitigation does not require the widening of Highland Valley Road at the intersection of SR 67. The current delays at the Highland Valley Road and SR 67 intersection are related to the existing high traffic volumes on SR 67 combined with the signal timing that is currently used. The improvements to the intersection planned with this development would greatly improve the capacity of the intersection, which would result in more efficient signal timing thus reducing vehicle queues and delays on Highland Valley Road. As described in Response to Comment G-10, project design and mitigation at the SR 67/Highland Valley Road/Dye Road intersection would achieve acceptable intersection operations per County LOS standards. Caltrans has reviewed the intersection design and agrees with the proposed intersection improvements. Refer to Comment Letter C.

G-14
The comment is not a specific comment related to the adequacy of the Draft EIR. The traffic analysis indicated that right-turn volumes do not warrant a separate right-turn lane on Highland Valley Road. The improvements to the intersection planned with this development would greatly improve the capacity of the intersection, which would result in more efficient signal timing thus reducing vehicle queues and delays on Highland Valley Road. As described in Response to Comment G-10, project design and mitigation at the SR 67/Highland Valley Road/Dye Road intersection would achieve acceptable intersection operations per County LOS standards.

G-15
The potential for odors from the lift station are analyzed in Section 4.1.8.3 of the Draft EIR. No odor measurement levels are detailed; however, the potential for odor and distance to nearest existing and future residences are described. It was found that with the installation of odor control filters, as proposed by the project (Draft EIR Section 1.1.2 Utilities) and required by the Minor Use Permit necessary for the lift station, the potential for odors to nearby residences would be less than significant.

G-16
Section 4.1 of the Draft EIR, Hydrology and Water Quality, analyzes the potential for offsite runoff or flooding. As detailed in the Hydrology and Drainage Study and the Storm Water Management Plan, runoff from the proposed project with the development of the project site would be at or below predevelopment conditions based on lengthened flow paths, a reduction of slope due to the creation of building pads, and installation of vegetative cover that provides for enhanced infiltration of surface storm discharge. Therefore, implementation of the project would not create flooding conditions on or offsite. As shown on the Tentative Map, Figure 1-9 of the Draft EIR, the footprints for development of the residential

pads in lots 120–125 are not located immediately adjacent to Voorhes Lane; rather, the pads are set closer to the internal project roadway, leaving space between the developed areas of the lots and property boundary. At least 20 feet, and typically more distance, is planned between Voorhes Lane and the residential development areas of the six adjacent lots. To ensure provision of a minimum 20-foot vegetated buffer along Voorhes Lane, the project Site Plan has been modified to include a requirement for future lot owners adjacent to Voorhes Lane to provide and maintain a minimum buffer of 20 feet.

G-17

The project Site Plan has been modified to include the requirement for a new fence along Voorhes Lane from Hardy Ranch to Open Space Lot H. The fence will consist of three- or four-strand wire with steel posts similar to that being used by the County of San Diego in and around Santa Maria Creek. The new fence will be continuous along the entire length with no openings or gates.

G-18

The project does not utilize Voorhes Lane in any way for access so no improvements are proposed or warranted on this street. Furthermore, construction-phase best management practices will be implemented that will prevent erosion of soil material from construction sites so that adjacent roadways (including Voorhes Lane) are not impacted. No changes were made to the EIR as a result of this comment.

G-19

The Cumming Ranch development includes landscaping to screen proposed roadways and residences from surrounding existing development. The project will be required to have a landscape plan approved prior to approval of a final map that must be in substantial conformance with the conceptual landscape plan (see Figures 1-13 and 1-14 of the EIR). Furthermore, the hill in the northern portion of Area A, which lies approximately 700 feet south of the eastern portion of Voorhes Lane, will not be developed and is proposed as part of open space lot ‘A’ (see Figures 1-6 and 1-16 of the EIR). No changes were made to the Final EIR as a result of this comment.

G-20

The comment does not address an issue related to the adequacy of the Draft EIR. The Draft EIR does include analysis of the Reduced Project Alternative in Section 5.5 that presents a development scenario similar to the spirit of the comment suggestion. The Reduced Project Alternative would develop only 47 homes with a minimum lot size of 4 acres with large setbacks from Highland Valley Road and SR 67. All homes would be on septic systems and no sewer would be installed. Refer to Section 5.5.3 of the Draft EIR.

G-21
The comment does not address a specific issue related to the adequacy of the visual analysis provided in the Draft EIR. Visual simulations were prepared for the Draft EIR visual analysis for the five key viewpoints that best represent the majority of views of the project site. Viewers from Voorhes Lane are limited to the residents along this road. This road is private and does not receive through traffic. No public viewpoints are available from this location and therefore the view from this location is not evaluated in the visual analysis.

G-22
It is correct that the project design has been altered since presentation to the RCPG in 2005. Since that time, the project has been modified to avoid potential impacts, such as wetlands. The overall number of residential lots being proposed has been reduced from 136 to 125, but the lots near Voorhes Lane have been reduced from 5 acres to approximately 3 acres or less. The Cumming Ranch Draft EIR and related documents, which included the most recent design, were reviewed and approved by the Ramona Community Planning Group at the meeting on December 2, 2010, and circulated for public review in the Draft EIR.

G-22 cont change the character of the entire area. People chose to live in this area because of the low-density, rural quality.

G-23 - Request correction to DEIR, page S-3 that states most of the residential parcels adjacent to the project are 1-5 acre. This does not apply to subarea 5 where lot acreages are 10-20 acres.

G-24 - Traffic impacts are significant and cannot be readily mitigated.

G-25 - The average lot size of the project is 1.6 acres. The project will be next to an established community of 10-20 acre lots.

G-26 - The lot size proposed is not big enough for animals or agricultural use, and there is the potential for conflict along Voorhes Lane where parcels have existing large animal uses.

G-27 - Sewer will lead to additional growth as it is growth inducing.

G-28 - The open space is not mixed with the community, but removed.

G-29 - There should be no habitat loss.

G-30 - The Draft Habitat Loss Permit is outdated.

G-31 - The project will damage the community character of the surrounding neighborhoods.

G-32 - The project as proposed may not be able to meet the criteria for the Interim Guidelines for Golden Eagles put out by the U. S. Fish and Wildlife Service recently.

Sincerely,

Kristi Mansolf, Secretary

for CHRIS ANDERSON, Chair
Ramona Community Planning Group

Attachments (4)

G-23
Additional text was added to the Final EIR providing additional data regarding the size of surrounding lots, including the lots adjacent to subarea 5.

G-24
The County of San Diego acknowledges that some of the direct and cumulative traffic impacts resulting from the proposed project are significant and unavoidable. Section 2.1 of the Draft EIR provides complete analysis of the traffic impacts and presents all feasible mitigation measures to reduce those impacts.

G-25
The comment does not address a specific issue related to the adequacy of the land use analysis provided in the Draft EIR. The County of San Diego acknowledges that some residential lots in the project vicinity are 10–20 acres as described by the comment. However, smaller rural residential developments are also near the project area, as noted in comment G4.

G-26
The comment does not address a specific issue related to the adequacy of the land use analysis provided in the Draft EIR. As described under Animal Keeping in Section 1.1.2 of the Draft EIR, animal keeping would be allowed where appropriate within the Cumming Ranch project, including corrals, barns, or stables. No conflict is apparent over large animal keeping as indicated by the commenter. Many lots on Voorhes Lane exceed a 3:1 length-to-frontage ratio and have the house at the street side and animal uses behind. This separates potential conflicts between existing animal keeping and the proposed project. Furthermore, the project does not take access from Voorhes Lane, which will add separation from the existing agricultural uses.

G-27
The comment does not address a specific issue related to the growth inducement analysis provided in the Draft EIR, nor does the comment substantiate the claim of growth inducement due to sewer installation. Growth-inducing Effects, Section 1.7 of the Draft EIR, provides an analysis of the sewer expansion into the project site. The analysis accounts for the offsite infrastructure into the adjacent Hardy Ranch as well as the Spirit of Joy church project. This connection has been coordinated between the two projects as it is the most logical service solution with the least amount of future disturbance. The analysis found that the project would not create growth-inducing impacts due to sewer expansion or other means because if the Cumming Ranch project were not implemented, the church would need to pursue other options to facilitate planned development of the property. Development of the church property is considered infill development and would be expected to occur with or without implementation of the Cumming Ranch project. In addition, growth beyond the project-specific development would

not be induced by the Cumming Ranch project. Although some properties in the vicinity (e.g., the adjacent property to the east of the project site currently supporting rabbit farms) could conceivably be developed to denser land use in the future, this growth is not attributable to the proposed project; this growth would be expected to occur with or without the proposed project as a result of the regional demand for housing.

G-28
The comment does not address a specific issue related to the adequacy of the land use analysis provided in the Draft EIR. A majority of the open space is located within Areas B and C to maintain these important large, contiguous areas for biological and grassland purposes. In addition, over 140 acres of open space are interspersed throughout the residential development proposed in Area A.

G-29
The comment does not address the analysis provided in the Draft EIR. Habitat loss does occur with the proposed residential development. However, the habitat loss is mitigated through preservation of additional habitat acreage as detailed in the Biological Technical Report and summarized in Section 3.1.5 of the Draft EIR and was found to be mitigated to less than significant.

G-30
The comment does not provide specifics regarding the adequacy of the Habitat Loss Permit (HLP). A Habitat Loss Permit is issued with the grading and improvement plans for a project. HLP findings are always updated at that time, and the Wildlife Agencies must give their concurrence with the permit at that time. Draft HLP findings are also updated in preparation for the project approval hearing.

G-31
The comment does not address the analysis provided in the Draft EIR. Land use compatibility is discussed in Section 4.1.4 of the Draft EIR. The development of the proposed project would alter the existing area from undeveloped land to a residential area. However, as part of the Ramona Community Plan, the Cumming Ranch SPA has been planned for residential development and the proposed development is considered appropriate for the area. The location of the property, adjacent to the highly developed Ramona Town Center and near infrastructure, and along transportation corridors is a logical area for expanded community development.

G-32
Since publication of the Draft EIR, the County and project applicant have coordinated with the U.S. Fish and Wildlife Service (USFWS) to address new legislation regarding the golden eagle. As recommended by USFWS, a new study was completed that included golden eagle surveys and a habitat

Comments to the Ramona Planning Group- December 2, 2010 Cummings Ranch Project

Shelley Berthiaume
Shelley. Berthiaume@yahoo.com
17289 Voorhes Lane
Ramona, Ca. 92065
619 933 3340

G-33 **The average lot size of the Cummings Ranch housing project is approximately 1.6 acres .These project lots are adjacent to an established community of 10 to 20 acre lots. While the project is described as 125 homes on 685 acres, in reality it is 125 homes on approximately 200 acres -thus creating an extreme density not in keeping with the character of the community and the rural structure of the west end. The proposed plan, which is decidedly in opposition to the community character, would inevitably lead to a clash of lifestyle expectations. For example, the project lots are not large enough for animal or agricultural use, therefore not in keeping with the character of the area in**

G-34 **which the project is proposed. The inherit issues with animals and agriculture may lead to conflict with the existing rural community and the newly imposed**

G-35 **urban development. In addition, density such as this and project proposed sewer system would potentially lead to additional growth and further**

G-36 **community degradation. The open space allotted to the project is not integrated within the housing but instead is quite removed. What is touted as a gift to the community is a disingenuous representation of land that is locked and wetlands.**

G-37 **Finally, the traffic issues created by such population density are significant and would not be readily mitigated.**

G-38 **Growth by definition does not mean a negative impact on a community. However, a high-density project such as Cummings Ranch, which is so in contrast to the existing community character and plan of the West End, will certainly have a devastating and irrevocable impact on our community.**

G-39 **Therefore, I ask for your careful consideration and disapproval of the current map as proposed by the Cummings Ranch project.**

assessment to determine potential project-related impacts to foraging habitat as well as impacts from recreational use. The study found that the proposed Cumming Ranch project would have less than significant impacts on foraging habitat and less than significant impacts due to recreational uses. See Response to Comment A-8 for additional details. Expanded information regarding the golden eagle has been added to the Final EIR.

G-33
Please see Responses to Comments G-5, G-25, and G-31 regarding surrounding lot sizes and community character. Information regarding surrounding lot sizes has been revised in the Final EIR.

G-34
Please see Response to Comment G-26 regarding animal keeping as part of the project. Animal keeping would be allowed within the residential lots as described in the Draft EIR under Animal Keeping in Section 1.1.2 of the Draft EIR. Agriculture activities would be allowed within the residential lots in a variety of ways, such as animal keeping, small orchards or row crops, or other small-scale farming activities. Because these activities and animal keeping allowances would be similar to residential agricultural that occurs on lots in the area surrounding the project, no land use or agricultural use conflicts would result.

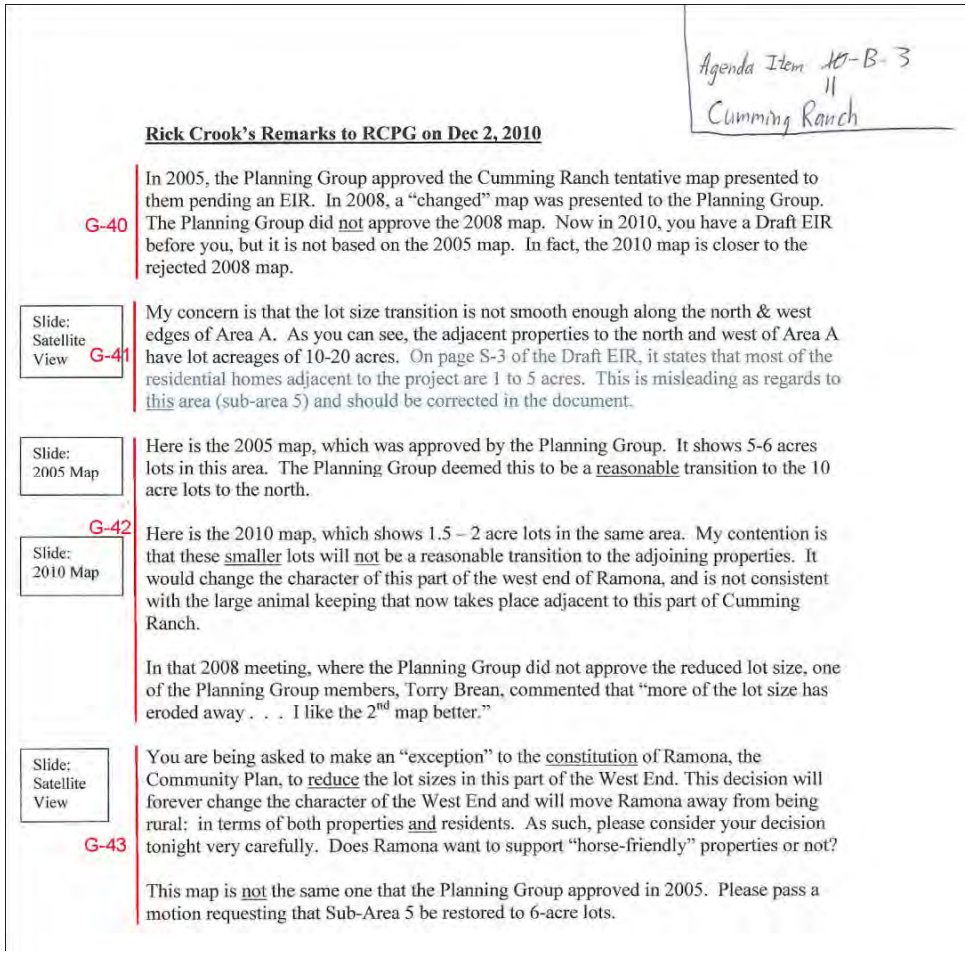
G-35
See Response to Comment G-27 regarding sewer expansion.

G-36
See Response to Comment G-28 regarding the open space with the residential development area.

G-37
See Response to Comment G-24 regarding traffic impacts.

G-38
Please see Responses to Comments G-5, G-25, and G-31 regarding surrounding lot sizes and community character. Response to comment G-35 addresses the planned development of the Cumming Ranch site within the Ramona Community Plan.

G-39
This comment is addressed to the members of the Ramona Community Planning Group and does not raise an issue regarding the Draft EIR. No response is necessary.



Agenda Item 10-B-3
11
Cumming Ranch

Rick Crook's Remarks to RCPG on Dec 2, 2010

G-40 In 2005, the Planning Group approved the Cumming Ranch tentative map presented to them pending an EIR. In 2008, a "changed" map was presented to the Planning Group. The Planning Group did not approve the 2008 map. Now in 2010, you have a Draft EIR before you, but it is not based on the 2005 map. In fact, the 2010 map is closer to the rejected 2008 map.

Slide: Satellite View

G-41 My concern is that the lot size transition is not smooth enough along the north & west edges of Area A. As you can see, the adjacent properties to the north and west of Area A have lot acreages of 10-20 acres. On page S-3 of the Draft EIR, it states that most of the residential homes adjacent to the project are 1 to 5 acres. This is misleading as regards to this area (sub-area 5) and should be corrected in the document.

Slide: 2005 Map

Here is the 2005 map, which was approved by the Planning Group. It shows 5-6 acres lots in this area. The Planning Group deemed this to be a reasonable transition to the 10 acre lots to the north.

G-42

Slide: 2010 Map

Here is the 2010 map, which shows 1.5 – 2 acre lots in the same area. My contention is that these smaller lots will not be a reasonable transition to the adjoining properties. It would change the character of this part of the west end of Ramona, and is not consistent with the large animal keeping that now takes place adjacent to this part of Cumming Ranch.

In that 2008 meeting, where the Planning Group did not approve the reduced lot size, one of the Planning Group members, Torry Brean, commented that "more of the lot size has eroded away . . . I like the 2nd map better."

Slide: Satellite View

G-43 You are being asked to make an "exception" to the constitution of Ramona, the Community Plan, to reduce the lot sizes in this part of the West End. This decision will forever change the character of the West End and will move Ramona away from being rural: in terms of both properties and residents. As such, please consider your decision tonight very carefully. Does Ramona want to support "horse-friendly" properties or not?

This map is not the same one that the Planning Group approved in 2005. Please pass a motion requesting that Sub-Area 5 be restored to 6-acre lots.

G-40
Please see Response to Comment G-22 regarding the reasons for the lot redesign as currently proposed as compared to the previous 2005 design.

G-41
Please see Responses to Comments G-5, G-25, and G-31 regarding surrounding lot sizes and community character. Information regarding surrounding lot sizes has been revised in the Final EIR.

G-42
Please see Responses to Comments G-5, G-25, and G-31 regarding surrounding lot sizes and community character. Please see Response to Comment G-26 regarding animal keeping as part of the project. Consistent with County policy, animal keeping would be allowed within the residential lots as described under Animal Keeping in Section 1.1.2 of the Draft EIR.

G-43
This comment is addressed to the members of the Ramona Community Planning Group and does not raise an issue regarding the Draft EIR. Please see Response to Comment G-22 regarding the reasons for the lot redesign as currently proposed as compared to the previous 2005 design. No additional response is necessary.

* Agenda Item 10-B-3

12-02-2010

Kristi, please be sure to record this in your RCPG minutes.
Thank you.

Re: OPPOSING Cumming Ranch project

The vast majority of our neighboring citizens oppose the Cumming Ranch project for the following reasons.
G-44 Incompatible Urban development in a Rural area damaging the Community Character of the surrounding neighborhoods. The reason why we chose to live in Ramona, and no other place, is because of the low density rural quality.

Darren & Michiyo Kirkaptrick

West side of Area A,
there are thousands of wild life live there
in Coastal Sage Scrub.
G-45 They are biologically sensitive, valuable
vegitation, therefore,
Habitat Loss should be ∅ Acres,
instead of 27 Acres.

G-44
Please see Responses to Comments G-5, G-25, and G-31 regarding surrounding lot sizes, community character, and the planned development of Cumming Ranch within the Ramona Community Plan.

G-45
Biological impacts of the proposed project were analyzed for all portions of the project site in the Draft EIR. Impacts resulting from the proposed project to biological resources are detailed in Section 3.1.3 and mitigation to reduce all biological impacts to a level less than significant are presented in Section 3.1.5 of the Draft EIR.

Kristi,
Please pass this letter on each of the RCPG. I assume the Cumming Ranch item will be on their next agenda.
Thank You,
Joe Minervini

> Date: Mon, 22 Nov 2010 17:23:59 -0800
> From: <jminervini1@cox.net>
> To: "troy_bucko@dot.ca.gov" <troy_bucko@dot.ca.gov>
> Subject: hwy 67 & Highland Valley Intersection Improvement
>
> I noticed that the engineering drawing for the intersection does not have a right hand only turn lane...on to westbound 67.
>
> The design calls for a straight thru lane combined with a right turn lane...basically, there will be no change for the Highland Valley side. If the Cumming Ranch development is fully developed as planned, it may add another 200 plus cars per day to the right hand turn lane. If your plans allow for 2 left turn lanes coming from northbound Dye Rd. on to 67 going west, this will mean those turning right on Highland will not be able to go while the 2 left turn lanes are going from Dye Rd. this, in essence, will add to the wait at the intersection as a whole: thus, there will be little or no mitigation to the LOS F at this intersection. Unless I am missing something, I think we need a right hand only turn lane as mentioned above. Additionally, why isn't there a lane on 67 that could accept the right hand traffic only lane I suggest or even if there was no right turn only lane on Highland Valley as I suggest, why not let cars on Highland Valley turning right on to 67 do so unimpeded....by addition of an additional lane on 67 instead of only 2 westbound lanes on 67 on the west side of the intersection ?
> Troy, I remember what you said about wanting to keep cost of acquisition as low as possible.....but we are talking about land that is very cheap as compared to the value it would add to commuter's lives in terms of the length of their commute.
>
> Joe

G-46

G-46
The intersection design modifications suggested by the commenter are noted. However, the SR 67 and Highland Valley Road/Dye Road intersection improvements proposed by the project, as detailed in Section 1.1.2 and in Figure 1-8 of the Draft EIR and also outlined in Mitigation Measure M-TR-1b, are within Caltrans jurisdiction. The applicant and County have worked with Caltrans to find a design that would improve the capacity of the intersection and result in more efficient signal timing to reduce vehicle queues and accommodate future traffic volumes. With the specified improvements, the intersection would operate at an acceptable LOS C or better and the project impacts would be mitigated to less than significant, as described in Section 2.1.6 of the Draft EIR. The intersection improvements have been reviewed by Caltrans and have their approval as noted in the Caltrans letter, Comment C-3.

RAMONA MUNICIPAL WATER DISTRICT
105 Earlham Street
Ramona, California 92065-1599
Telephone:
(760) 789-1330

November 24, 2010 JO 10406

Larry Hofreiter
Department of Planning and Land Use
Project Processing Counter
5201 Ruffin Road, Suite B
San Diego, CA 92123-1666

SUBJECT: GPA 03-007; SP 03-005; TM 5344; STP 10-007; REZ 07-002, LOG NO. 03-09-028; SCH NO. 2004031136; CUMMING RANCH PROJECT.

Dear Mr. Hofreiter,

The Ramona Municipal Water District (RMWD) has the following comments on the Cumming Ranch's Draft Environmental Impact Report (DEIR).

H-1 On page S-1, the DEIR states, "*The project site is 682.6 acres in size. Of the 682.6 acres, 457.4 acres approximately 67 percent) would be made available as permanent open space for inclusion in the Ramona Grasslands Preserve and 215.4 acres would be used for residential development.*" The RMWD does not have adequate wastewater spray disposal sites to meet the growth planned for in the County's 2020 General Plan. To our knowledge the 457 acres represents the last land area remaining in Ramona without environmental restrictions preventing it from being used as sprayfields. The RMWD is requesting that as a part of the open space easement placed on the land that the County specify a dual use for the property that would allow spray fields on the land as requested in letter from the RMWD to the County Board of Supervisors dated July 17, 2009. This would be consistent with the support offered from the County's Deputy Chief Administrative Officer during meetings in February 2010.

H-2 On page 1-10, the DEIR states, "*The project is not within the latent powers sewer service area of RMWD.*" This sentence should be revised to read, "*The project is not within the activated latent powers sewer service area of RMWD, but is within its' Sphere of Influence*".

H-3 On page 1-10, the DEIR also states, "*The project owns easement rights for utilities within the Hardy Ranch property and all offsite locations are assessed and mitigated within this EIR*". This sentence should be revised to read, "*The project owns easement rights for utilities within the Hardy Ranch property ~~and all.~~ These offsite locations are assessed and mitigated within this EIR and these rights may be assigned to the RMWD.*"

Letter H
Ramona Municipal Water District

H-1
The lands being designated for open space within the Cumming Ranch property are environmentally sensitive, and spray fields have been specifically excluded as an allowed use in the Specific Plan. In addition there are two major reasons why Areas B and C are not suitable for spray fields. First, approximately 41.2 percent of the 457.4 acres of open space is within the floodplain of two drainage systems. The drainage systems are subject to flowing water during rain and fragment the area leaving minimal usable or assessable acreage, especially during wet weather. These areas also contain biologically sensitive lands classified as "wetlands." Second, most of the upland soils in Area B and C have a considerable clay component that make them less suitable for rapid infiltration of treated effluent (Infiltration Feasibility Study, GeoSoils, September 9, 2010). The associated Ramona Grasslands also have unique flora and fauna that are to be preserved as a block of habitat to maintain their biological integrity and reduce edge effects.

H-2
Text has been revised as requested in the Final EIR.

H-3
Text has been revised as requested in the Final EIR.

H-4 On page 1-16, the DEIR states, "*Area B consists of 201.0 acres that would be designated as open space. The owner plans, following recordation of the final map, to convey by sale 138.5 acres of Area B to the County or to a conservancy acting on behalf of the Ramona Grasslands Preserve, for inclusion in the Ramona Grasslands Preserve.*" On page 1-17, it states *"Area C consists of 113.1 acres that would be designated as open space. The owner plans, with recordation of the final map, to convey by donation Area C in fee title to the County or to a conservancy acting on behalf of the Ramona Grasslands Preserve, for inclusion in the Ramona Grasslands Preserve."* See RMWD comments to page S-1 of the DEIR. The RMWD requests that the County include a spray field provision in the open space easement.

H-5 On page 1-37, the DEIR states, "*In 2008, RMWD purchased a 285-acre portion of Davis Ranch from The Nature Conservancy for use as spray fields. This land was formerly leased from the Davis Ranch.*" It should be noted that this land is not sufficient to meet the requirements of the County's General Plan Update. The RMWD requests that the County include a spray field provision in the open space easement.

H-6 On Page 1-41, the map of the Core Grasslands Reserve incorrectly includes RMWD property owned on the east side of Rangeland Road. The map should be modified to exclude the sprayfield property from the Grasslands Reserve.

H-7 On page 3-31 of the General Plan Amendment Report, "*A system evaluation analysis will be required by RMWD prior to approval of implementing discretionary approvals in order to evaluate the ability of the existing storage, treatment, and conveyance systems to accommodate the project. If the system evaluation analysis finds that there is not adequate infrastructure and facilities to convey the required water to the project site, additional improvements may be required."* The RMWD requests that the County include a spray field provision in the open space easement.

H-8 If you have any questions or comments about the issues we have addressed please feel free to contact Phillip Dauben at: 760-788-2260 or via email at pdauben@rmwd.org.

Sincerely,

Timothy N Stanton, P.E.
District Engineer

Cc: Dianne Jacob, County Supervisor
Chandra Wallar, County Deputy Chief Administrative Officer
Eric Gibson, Director of the Department of Planning and Landuse
File J.O. 10406

H-4
No spray field provision is being added. See Response to Comment H-1 above.

H-5
No spray field provision is being added. See Response to Comment H-1 above.

H-6
Figure 1-4, Ramona Grasslands Preserve General Boundaries Map, has been revised to exclude RMWD property as requested in the comment.

H-7
No spray field provision is being added. See Response to Comment H-1 above.

H-8
Closing statements noted and no response is necessary.

LAFCO

San Diego Local Agency Formation Commission

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(619) 531-5400 • FAX (619) 557-4190
Website: www.sdlafco.org

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Executive Officer

Michael D. Ott

Counsel

Karen Landers

December 17, 2010

TO: Larry Hofreiter (O650)
County of San Diego Department of Planning and Land Use

FROM: Local Governmental Analyst (A216)
San Diego Local Agency Formation Commission

SUBJECT: Notice of Availability of a Draft Environmental Impact Report for the Cumming Ranch project (GPA03-007; SP03-005; TM5344; STP10-007; REZ07-002; Log No. 03-09-028; SCH No. 2004031136)

Dear Mr. Hofreiter:

Thank you for providing the San Diego Local Agency Formation Commission (LAFCO) an opportunity to provide comments on the above referenced project. LAFCO is empowered by the California State Legislature with discretionary authority over proposed changes to local government organization, extension of municipal services, and any associated sphere of influence actions (California Government Code § 56000, et seq.).

I-1

LAFCO is directed to exercise its discretionary authority in a manner that encourages orderly development and growth while fulfilling many regional priorities, such as accommodating additional growth within, or through the expansion of local agency boundaries. LAFCO is also required to consider the impact that proposed jurisdictional changes may have on providing necessary governmental services and housing for persons of all incomes.

San Diego LAFCO is typically a responsible agency for environmental review under the California Environmental Quality Act (CEQA) when a proposed project requires LAFCO discretionary approval(s). As a responsible agency, LAFCO would typically utilize the lead agency's CEQA documentation; therefore, it is important for the lead agency's environmental documents to be germane to the statutory responsibilities of LAFCO.

Therefore, we offer the following comments:

LAFCO Approvals

I-2

As correctly stated in the *Project Description and Environmental Setting* section (page 1-10), the proposed project area is not located within the latent sewer powers area of the Ramona Municipal Water District (MWD); therefore, the proposed extension of sewer service to the project area would require LAFCO discretionary approval of an expansion of the Ramona MWD's latent sewer power area to include the subject territory. The EIR should indicate that prior to

Letter I
LAFCO Responses

I-1
Comment A-1 is an introduction to the comment letter LAFCO's discretionary authority and role as a responsible agency under CEQA. No response is necessary.

I-2
Text has been added in Section 1.1.2 of the Final EIR to state that, prior to LAFCO consideration of the latent power expansion, the applicant will also need to participate in the update of a Municipal Service Review per Government Code Section 56430.

I-2 Cont LAFCO consideration of the latent power expansion, the applicant will also need to participate in the update of a Municipal Service Review per Government Code § 56430.

I-3 Since the proposed project requires LAFCO approval of changes to local government organization, San Diego LAFCO will be a responsible agency for the jurisdictional changes associated with this project.

I-4 The Project Description within the *Summary* section regarding water and sewer services from Ramona MWD (Page S-2) should include a statement regarding the need for LAFCO approval of an expansion of the district's latent sewer power area for the extension of sewer service to the proposed project area.

I-5 San Diego LAFCO has recently adopted Policy L-107, which addresses jurisdictional conflicts related to proposed changes of organization or reorganization. The policy requires the subject proposal's applicant to demonstrate that adjacent jurisdictions and interested parties have been consulted, that any jurisdictional conflicts or potential jurisdictional conflicts have been identified, and that the identified conflicts have been resolved or remain unresolved. Therefore, in addition to the areas of controversy cited in Section S.3 (*Areas of Controversy*), the EIR should also identify any potential jurisdictional conflicts and related environmental impacts (e.g., effects on providing planned, orderly, efficient patterns of development; effects on maintaining integrity of agricultural lands; timely availability of water, wastewater, and fire services adequate to meet the project's anticipated needs, etc.) and state whether the identified conflicts/impacts have been resolved or remain unresolved.

I-6 Chapter 1.0 *Project Description and Environmental Setting* mentions the need for "...associated permits and approvals" (page 1-1). Please specify the project's required permits and approvals, including the need for LAFCO approval of an expansion of the Ramona MWD latent sewer power area to include the project area.

I-7 Page 1-36 references Government Code § 56668 and states that the 14 required factors of analysis within the section are "...considered in various sections of the EIR analysis." Please specify the sections within the EIR that address and consider each of the factors contained in Government Code § 56668.

Agricultural Resources

I-8 LAFCOs are required to consider how proposed jurisdictional changes could affect open space and prime agricultural lands. Commissions are directed to guide development away from prime agricultural lands – unless that action would not promote the planned, orderly and efficient development of an area – and to encourage development of existing vacant or non-prime agricultural lands within a jurisdiction before approving any proposal that would allow development of open-space lands outside of an agency's boundary (Govt. Code § 56377). Proposals must be further reviewed for their effect on maintaining the physical and economic integrity of agricultural lands (Govt. Code § 56668).

I-9 In response to these statutory requirements, San Diego LAFCO has adopted Policy L-101 "Preservation of Open Space and Prime Agricultural Lands". For LAFCO's use as a responsible agency, the EIR's Agricultural Resources Section (Ch. 4.1.3) should include a discussion of the proposed project's conformance with Policy L-101, with specific reference to the definition of "Prime Agricultural Land" (per Government Code § 56054) and the impact of the proposed project on these lands. The subject policy is attached for your review.

Page 1-36 should reference the definition of "Prime Agricultural Land" as stated in Government Code § 56054 as well as whether the project is in conformance with San Diego LAFCO Policy L-101.

I-3
The County acknowledges LAFCO's role as a responsible agency in the CEQA process for this project.

I-4
A sentence has been added to the Project Description in the Summary of the Final EIR regarding the need for LAFCO approval of an expansion of the RMWD latent sewer power area for the extension of sewer service to the proposed project area.

I-5
Section S.3, Areas of Known Controversy in the Final EIR, has been updated to include those issues identified within this comment including potential effects on providing planned, orderly, efficient patterns of development; effects on maintaining integrity of agricultural lands; and timely availability of water, wastewater, and fire services adequate to meet the project's anticipated needs. Effects on planned, orderly, and efficient patterns of development are addressed in the analysis of Land Use and Planning, Section 4.1.4; maintaining integrity of agricultural lands is addressed in Agricultural Resources, Section 4.1.3; and availability of water, wastewater, and fire services is addressed in Public Services and Recreation, Section 3.6. All of these issues were resolved with land use and agricultural resources resulting in less than significant impacts. Public services were found to have potentially significant impacts, but could be reduced to below a level of significance with required mitigation.

I-6
Table 1-5 of the Draft EIR provides a complete list of approvals/permits required for the project. This table includes the requirement for LAFCO approval of the expansion of RMWD latent power service area.

I-7
The Final EIR has text added to specify where each of the factor topics is generally discussed within the document.

I-8
This comment provides details on LAFCO's agricultural policies. No specific issue regarding analysis in the Draft EIR is provided and no response is necessary.

I-9
In response to this comment, additional agricultural analysis has been conducted to analyze consistency of the project with Government Code Section 56377 and San Diego LAFCO Policy L-101 regarding preservation of open space and prime agricultural land; this analysis has been added to Section 4.1.3 of the Final EIR. The analysis found that per the definition in Government Code Section 56054,

approximately 62 acres of land within Area A would qualify as Prime Agricultural Land, due to the soil types present. However, the project would still be consistent with Policy L-101 as the site is clearly planned for development by the County of San Diego General Plan and Ramona Community Plan, the site location is near an existing urbanized center and key transportation corridors, and the site has immediate proximity to the SMWWTP; thus, the project is considered to reflect the planned, orderly, and efficient development of the area. The analysis is fully detailed within Section 4.1.3.3 the Final EIR.

I-9 Cont

As it is acknowledged that *prime soils* exist on the proposed project site (page 4-30 and Table 4-9), it should be noted that the project site is located within the water service area of the Ramona MWD; therefore, irrigation to the subject territory should be considered feasible.

Fire Protection Service

I-10

The Project Facility Availability Form provided by the Ramona MWD Fire Department states that fire protection facilities are not expected to be adequate to serve the proposed project within the next five years. Ramona MWD has stated that the district is unable to provide adequate fire protection services to the proposed project due to budgetary constraints. Please expand the discussion in the EIR regarding the provision of fire protection services to the proposed project area, including existing and proposed response times, planned infrastructure improvements, and estimated costs to ensure adequate fire protection services to the subject territory as well as to the existing community.

I-11

Chapter 3.6 *Public Services and Recreation*, Section 3.6-1 Existing Conditions- Fire Protection should include a discussion on the level of service capabilities of the individual stations, including existing equipment, numbers of crew, and whether each station is designated for wildland fire protection or structural fire response and emergency medical services.

I-12

Page 3.6-8 should identify the needed facilities and capital improvements to provide an adequate level of fire protection services to the proposed project area as well as to provide estimates of the costs for such improvements and the anticipated timing of the improvements.

Sewer Service

I-13

The Project Facility Availability Form for sewer service by the Ramona MWD states that the district anticipates services to the proposed project to be conditionally available within the next five years. The district's conditions include the development of a Sewer System Evaluation and Sewer Service Agreement prior to the preparation of the project's Draft EIR. Please provide copies of the referenced system evaluation and service agreement since these documents were not made available to LAFCO staff. Section 3.6.3 *Analysis of Project Effects and Determination as to Significance* should include discussion and analysis of these documents and conditions, as well as their findings/conclusions, in relation to the statutory requirements of LAFCO.

I-14

The Chapter 1.0 (*Project Description and Environmental Setting)* Page 1-36 contains a statement that "Annexation into the ASPA for sewer service via LAFCO would be required." This should be corrected to state that *"LAFCO approval of an expansion of the Ramona MWD latent sewer power area to include the proposed project area is required."*

Page 1-36 also includes a statement that *"While the project is not in the sphere for sewer service..."* which should be corrected to state "While the project area is not located within the *RMWD latent sewer power area..."*

Chapter 3.6 *Public Services and Recreation*, Section 3.6-4 *Sewer Service and Treatment* states that *"The Cumming Ranch site lies outside the service area boundaries of RMWD's SMWWTP service zone but is located within the RMWD sphere of influence."* This statement should be corrected to *"The Cumming Ranch site is within the RMWD, but is not located within the district's latent sewer power area. LAFCO approval of an expansion of the Ramona MWD latent sewer power area to include the proposed project area is required before the project can receive sewer service from RMWD."*

I-10
As stated in the Draft EIR, a potentially significant impact regarding the adequate provision of fire service to the project site was identified as Impact PS-1. This conclusion was based on reasons such as those provided in this comment. Mitigation for the fire service impact, Mitigation Measure M-PS-1, requires the project developer to participate in a Community Facilities District as required by the Ramona Fire Prevention Bureau and to pay all fees and meet the requirements of the Community Facilities District. It is through this Community Facilities District that necessary improvements and/or expansions of fire service facilities would be determined, planned, and funded. This mitigation measure is consistent with the requirements and conditions outlined in the Fire Project Facility Availability Form and letter of conditions (RMWD 2011, attached to this response to comments document) that has been updated since circulation of the Draft EIR. The letter of condition states that additional staffing may be required and the threshold for additional staffing, equipment, infrastructure, etc. would be identified through the Community Facilities District. Though all the necessary improvements to fire service facilities have not yet been determined, the information regarding the potential need for additional staff has been added to the Final EIR.

I-11
Additional information regarding each of the fire service stations has been added to Section 3.6-1 of the Final EIR.

I-12
Please see Response to Comment I-10 regarding future improvements/ expansion to fire service facilities.

I-13
The service agreement referenced in the Project Facility Availability Form for Sewer Service has not been finalized. The RMWD's Sewer System Evaluation has not been provided to the applicant or County.

I-14
The text revisions as requested in this comment have been made in the Final EIR.

I-15 Page 3.6-5 should identify which phase of Ramona MWD's planned SMWWTP expansion that contains the project's anticipated EDU's and provide an estimate of the timing for the treatment capacity to become available for the project's needs.

Water Service

I-16 The Project Facility Availability Form for water service by the Ramona MWD states that the district anticipates services to the proposed project to be conditionally available within the next five years. The district's conditions include the development of a Water System Evaluation and Water Service Agreement prior to the preparation of the project's Draft EIR. Please provide copies of the referenced system evaluation and service agreement. Section 3.6.3 *Analysis of Project Effects and Determination as to Significance* should include discussion and analysis of these documents and conditions, as well as their findings/conclusions, in relation to the statutory requirements of LAFCO.

The Chapter 1.0 (*Project Description and Environmental Setting)* Utilities section (page 1-9) should specify distances for connection of the project area to the Ramona MWD water system.

I-17 On Page 1-36, the statement that *"For water service, the project is located within the latent powers area of the RMWD..."* should be corrected to state that *"...the project area is located within the existing water service area of the RMWD..."*

Chapter 3.6 *Public Services and Recreation*, Section 3.6-4 *Water Supply and Service* should specify distances for connection of the project area to the Ramona MWD water system.

Table 3.6-3 should include the project's total annual projected water demands in acre-feet.

I-18 Should you have any questions, or if San Diego LAFCO may be of any further assistance, please contact me at (619) 531-5409.

Sincerely,

ROBERT BARRY, AICP
Local Governmental Analyst

RB:trl

I-19 Attachments:
San Diego LAFCO Policy L-101
San Diego LAFCO Policy L-107

I-15
The anticipated timing of each phase of the SMWWTP expansion project is not specifically provided in the environmental documentation for that project. The Project Facility Availability Form for Sewer Service (RMWD 2011) states that adequate capacity would be reasonably expected within the next 5 years. However, because the expansion timing is uncertain and dictated by demand, the Draft EIR for the Cumming Ranch project identified a potentially significant impact regarding the provision of sewer service. As required by Mitigation Measure M-PS-3, the County will not approve grading plans, improvement plans, or the Final Map for the project until RMWD has provided a commitment of wastewater treatment capacity to serve the project.

I-16
Please see Response to Comment I-13 above. The Water System Evaluation has not been provided to the applicant or County.

I-17
The information and text revisions requested in this comment have been added to the Final EIR. As detailed in Section 3.6 of the Draft EIR, the project would consume the equivalent of approximately 78 acre-feet/year. Because the proposed water system for the project would connect to a water main within Highland Valley Road, there is no connection distance to the existing water system as the alignment passes through the project site; thus, no additional details regarding connection distances were added to the Final EIR text.

I-18
Closing statements are noted and no response is necessary.

I-19
The attachments to the letter provide LAFCO policies and do not include comment on the analysis in the Draft EIR. No response is necessary.

I-19 cont

Subject

PRESERVATION OF OPEN SPACE AND AGRICULTURAL LANDS

Purpose

To further the policies and priorities of the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000 regarding the preservation of open space and prime agricultural lands.

Background

The State Legislature has instructed Local Agency Formation Commissions to establish policies that address the preservation of open space (Govt. Codes § 56300 and 56377). LAFCOs are required to consider how spheres of influence or changes of local governmental organization could affect open space and prime agricultural lands. Commissions are directed to guide development away from prime agricultural lands – unless that action would not promote the planned, orderly and efficient development of an area – and to encourage development of existing vacant or non-prime agricultural lands within a jurisdiction before approving any proposal that would allow development of open-space lands outside of an agency's boundary (Govt. Code § 56377). Proposals must be further reviewed for their effect on maintaining the physical and economic integrity of agricultural lands (Govt. Code § 56668).

Policy

It is the policy of the San Diego Local Agency Formation Commission to:

1. Discourage proposals that would convert prime agricultural or open space lands to other uses unless such an action would not promote the planned, orderly, efficient development of an area ***or*** the affected jurisdiction has identified all prime agricultural lands within its sphere of influence and adopted measures that would effectively preserve prime agricultural lands for agricultural use;
2. Require prezoning of territory (city only) to identify areas subject to agricultural/preservation and planned development;

I-19 Cont

3. Follow San Diego LAFCO's adopted procedures to define agricultural and open space lands and to determine when a proposal may adversely affect such lands.

Adopted:	November 6, 1978
Amended:	June 4, 1990
Amended:	May 4, 1998
Technically Updated:	January 1, 2001

Cross-reference:

SAN DIEGO LAFCO PROCEDURES:
-Open Space and Agricultural Preservation

Subject

JURISDICTIONAL CONFLICTS ASSOCIATED WITH PROPOSED DEVELOPMENT

Purpose

To establish a procedure for cities, special districts, and the County of San Diego to discuss and potentially resolve jurisdictional conflicts associated with development projects that require LAFCO discretionary approval(s).

Background

Proposed development projects that involve annexation of territory to a city or special district can result in conflicts between the proposed and existing land uses and zoning of the respective land use jurisdictions. While LAFCO is prohibited by State Law from directly regulating land use density or intensity, property development, or subdivision requirements (Government Code § 56375(a)(6)), it is required to consider in the review of a jurisdictional proposal, the consistency with city or county general plans (Government Code § 56668(g).

I-19
Cont

In terms of city annexation proposals, Government Code § 56375(a)(7) requires LAFCO to base its decision on a proposal to annex territory to a city upon the general plan and prezoning of the subject city. However, LAFCO is also required to consider the following factors in the review of a proposal: the effects of a proposal on adjacent areas (Government Code § 56668(c); the proposal's consistency with city or county general and specific plans (Government Code § 56668(g); the comments of any affected local agency or other public agency (Government Code § 56668(i); and, any information relating to existing land use designations (Government Code § 56668(n). With the exception of (Government Code § 56375(a)(7), LAFCO must consider the same factors when evaluating the annexation of unincorporated territory to special districts.

Within the local development approval process, LAFCO staff has historically encouraged the lead agency for the development to consult with the adjacent jurisdictions in order to identify and resolve any potential jurisdictional issues prior to LAFCO submittal.

To facilitate discussion and resolution of any inconsistencies between the affected

land use authorities, the following policy has been adopted to encourage logical and orderly development that reflects the concerns of the affected city, special districts, and the County of San Diego.

Policy

It is the policy of the San Diego Local Agency Formation Commission that:

I-19 Cont

1. Prior to submission of a proposal requesting LAFCO consideration of a city or special district jurisdictional change, representatives from the affected city, special districts, County of San Diego, and applicable planning, sponsor groups and organizations shall meet at the earliest possible stage for the purpose of identifying and attempting to resolve issues associated with the proposed jurisdictional change. The Executive Officer may waive the consultation procedure outlined in this provision when it can be determined with certainty that there will be no possibility that the proposal in question will result in significant jurisdictional impacts.

2. The consultation process described in provision no. 1 should identify any jurisdictional concerns related to:

   a. Differing development standards;

   b. Existing and/or planned land uses and zoning, including densities, community character, and appropriate jurisdictional transition areas;

   c. Existing and/or planned provision of governmental services, including any potential impacts to service levels or financial ability to sustain service levels; and,

   d. Any other local community or governmental concerns.

3. If an agreement is reached regarding provision no. 2, the subject proposal's LAFCO application shall include signed confirmation by representatives of the agencies. LAFCO applications shall include signature confirmation forms documenting the agreement.

land use authorities, the following policy has been adopted to encourage logical and orderly development that reflects the concerns of the affected city, special districts, and the County of San Diego.

Policy

It is the policy of the San Diego Local Agency Formation Commission that:

I-19 Cont

1. Prior to submission of a proposal requesting LAFCO consideration of a city or special district jurisdictional change, representatives from the affected city, special districts, County of San Diego, and applicable planning, sponsor groups and organizations shall meet at the earliest possible stage for the purpose of identifying and attempting to resolve issues associated with the proposed jurisdictional change. The Executive Officer may waive the consultation procedure outlined in this provision when it can be determined with certainty that there will be no possibility that the proposal in question will result in significant jurisdictional impacts.

2. The consultation process described in provision no. 1 should identify any jurisdictional concerns related to:

   a. Differing development standards;

   b. Existing and/or planned land uses and zoning, including densities, community character, and appropriate jurisdictional transition areas;

   c. Existing and/or planned provision of governmental services, including any potential impacts to service levels or financial ability to sustain service levels; and,

   d. Any other local community or governmental concerns.

3. If an agreement is reached regarding provision no. 2, the subject proposal's LAFCO application shall include signed confirmation by representatives of the agencies. LAFCO applications shall include signature confirmation forms documenting the agreement.

I-19 Cont

4. The Commission shall consider the agreement in its evaluation of the proposed jurisdictional change to the extent that it is consistent with State Law and San Diego LAFCO policies and procedures. The agreement may reference, but not be limited to, approved tax sharing agreements among subject local agencies.

5. If the parties have consulted in accordance with this policy and are unable to reach agreement, the parties shall, in writing, inform the Executive Officer of the areas in which they are unable to reach agreement and the desired the areas in which they are unable to reach agreement and the desired outcome. Thereafter, the proposal shall proceed in accordance with State Law and applicable San Diego LAFCO policies and procedures.

6. Affected local agencies shall be encouraged to explore methods to improve inter-and intra-departmental and jurisdictional communication for the purpose of discussing and commenting on proposed development and jurisdictional changes.

Adopted: May 3, 2010

Cross-reference:

SAN DIEGO LAFCO POLICY:
-L-100 CITY ANNEXATION OF UNINCORPORATED TERRITORY WITHIN SPECIAL DISTRICTS
-L-103 RECOGNITION OF UNINCORPORATED COMMUNITIES

SAN DIEGO LAFCO PROCEDURES:
-SPHERES OF INFLUENCE
-LAFCO-INITIATED PROPOSALS

Conservation Biology Institute

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Encinitas, California 92024
(760) 634-1590

www.consbio.org

14 December 2010

Mr. Larry Hofreiter
Department of Planning and Land Use
County of San Diego
5201 Ruffin Road, Suite B
San Diego, CA 92123

RE: Cumming Ranch DEIR

Dear Mr. Hofreiter:

J-1 The Conservation Biology Institute is a 501(c)(3) organization that provides science support for habitat conservation efforts. Our staff has played a major role in the habitat conservation programs in San Diego County, both in conservation planning and in implementation (i.e., habitat management and monitoring).

J-2 There has been significant investment of conservation funds for acquisition and management in the Ramona Grasslands, where the subject project is located, as well as lands on the opposite (southeast) side of Highway 67, within the South County MSCP. Therefore, our comments focus on project factors that may compromise the conservation value of already conserved lands and include recommendations for improving preserve design.

1. **Undeveloped land inside residential development areas in Tract A cannot be counted as biological mitigation because it does not function as biological open space, especially considering long-term impacts of edge effects.**

J-3 These patches of habitat, while a visual benefit for the project, are too isolated and small to function as biological open space. Over time their conservation values will be diminished by edge effects of the surrounding development, which decrease the net, biologically functional area of habitats left undeveloped. Edge effects take on many forms, including physical or structural changes (e.g., moisture levels, vegetation density), plant growth rates, and species interactions (e.g., predation, competition, brood parasitism, herbivory, pollination, and seed dispersal) (Mitrovich et al. 2010, Sauvajot et al. 1998, Donovan et al. 1997, Murcia 1995). While some species are tolerant of or respond positively to human modifications associated with development (i.e., *synanthropic* species), many native species are negatively impacted (Crooks 2002, Blair 1996, Sauvajot and Buechner 1993, Soulé et al. 1992, Bolger et al. 1991, Soulé et al. 1988).

Some of the most influential and pioneering research into the ecological effects of habitat fragmentation and resulting isolation and edge effects was conducted in San Diego County, demonstrating that some species disappear from habitat that has been fragmented (Bolger 2002, 2007; Morrison et al. 2004, Patten and Bolger 2003, Crooks and Soulé 1999, Suarez et al. 1998). Soulé et al. 1988 showed that in coastal sage scrub habitats, avian species richness typically decreases with size and age of isolation of habitat fragments. These studies

Letter J
Conservation Biology Institute, Inc.

J-1
The comment provides an opening statement and description of the commenting organization. No response is necessary.

J-2
The comment provides a description of the commenting organization's focus. The County acknowledges planning and conservation efforts related to the Ramona Grasslands. The County has also been active in the effort to preserve the Ramona Grasslands.

J-3
The comment states that open space lots within Area A should not be counted toward mitigation. Lots A, B, D, and F have been reevaluated in part based on this comment and will be not be counted toward mitigation. Refer to Response to Comment A-5 for the rationale. Including Lots C and E, which were identified as impact neutral in the Draft EIR, all of the lots southwest of Highland Valley Road are considered impact neutral in the Final EIR. While these lots are impact neutral, they have biological resources that are important (wetlands, oaks, rocky coastal sage scrub). The biological resources will be preserved in open space easements with buffers of sufficient size to maintain biological value. However, because they do not have connectivity to the Ramona Grasslands Preserve, they will be considered impact neutral and provide no mitigation credit. Please see revisions to the Final EIR which identify lots A, B, D, and F as impact neutral.

All upland mitigation for the project would now be accomplished in Open Space Lots G, I, and J of Area A, and within open space Areas B and C. Lots I, J, and G within Area A are of the appropriate size, quality, and provide important continuity with adjacent open space preserved in Area B. Thus, these lots continue to provide mitigation acreage. One location between Lot 108 and Lot 88 has been adjusted to achieve a minimum width of 340 feet. Because this location is on a ridge and adjacent to LBZs, most wildlife will continue to utilize this area because all line-of-sight is unobstructed. All of the other open space lots provide for wildlife movement consistent with the MSCP standards for wildlife movement. All have adequate cover to conceal all kinds of wildlife and all have visible pathways to the Ramona Grasslands Preserve of Areas B and C.

have demonstrated the cascading ecological impacts that occur when habitat patches become too small to sustain natural ecological functions and processes–and the faunal collapse that ensues.

J-4 Development and other human land uses generally facilitate the invasion of nonnative plant species into adjacent natural habitats, especially in small habitat fragments (Matlack 1993, Brothers and Spingarn 1992, Tyser and Worley 1992, McConnaughay and Bazzaz 1987). Invasive nonnative species in landscaping can become established and spread into the interior of natural open space areas (Alberts et al. 1993). Construction of roads and other infrastructure (e.g., pipelines and transmission lines) and recreational activities within open space disturb existing vegetation, compact soils, and change natural runoff patterns, further facilitating nonnative plant invasion. Clearing native vegetation to reduce fire threat and planting non-native ornamental plants around dwelling units also facilitates establishment of nonnative plant species in habitat areas adjacent to development.

J-5 Air and water pollution associated with development and roads have significantly degraded habitats throughout much of Southern California (Minnich and Dezzani 1998, Allen et al. 1996). Increased nitrogen input into soils from automobile exhaust greatly favors weedy annual species over native perennial species (Allen et al. 1996). Runoff from irrigation of landscaping not only carries fertilizers and pesticides, but the net addition of imported water to typically intermittent and ephemeral stream systems can favor exotic species and ultimately change the hydrology and species composition of native communities over time (White and Greer 2006). Artificial night lighting (*light pollution*) can have profound impacts on animals by affecting their orientation, foraging, reproduction, and communication, among other behaviors and interspecific interactions (Longcore and Rich 2004). Anticoagulant rodenticides, often used around residential areas and in agricultural fields, are a threat to badgers and raptors through the consumption of poisoned prey. Riley et al. (2007) cite rodenticides in 31 of 39 bobcats tested in Southern California and caused the death of two mountain lions.

J-6 As edge effects tend to be species- and habitat-specific, the extent of their impacts is also variable. Some researchers have demonstrated effects that extend as far as 200-250 m (Mitrovich et al. 2010, Bolger 2007) to as much as 500 m (Wilcove et al. 1986) from the development-habitat edge (approx. 820-1,600 ft). Edge effects are often of greater magnitude in regions with high landscape fragmentation (Lahti 2001). Assuming (conservatively) that edge effects extend 200 m from the residential lots into the undeveloped land in Tract A, every acre of the open space areas within Tract A will be subject to edge effects and should not be considered as biological mitigation. Even at its widest, the largest open space (Area "I," Figure 1-5) is only approximately 400 m (1,200 ft) across.

J-7 2. **Redirect mitigation to enhancing the regional landscape linkage within the Pre-Approved Mitigation Area (PAMA,) which includes the property and other land adjacent to Highway 67, to mitigate for the increase in traffic as a result of the development.**

J-8 Figure 7 of the Biological Technical Report shows the regional wildlife linkages connecting to the Ramona Grasslands Preserve. The Santa Maria Creek Linkage and the linkage across Highway 67 to the Barnett Ranch Open Space Preserve are shown as "Primary Linkages," connecting the Ramona Grasslands to the San Dieguito River Valley and to the South County MSCP grasslands, respectively. **The EIR does not indicate how many acres of this latter Primary Linkage across Highway 67 are impacted.** The EIR does acknowledge that while the two creeks are assumed to function as movement corridors, grassland species such as badgers do not necessarily use riparian areas for movement. Badgers have relatively large home ranges, with some estimates as large as >4,000 acres (Sargeant and Warner 1972), and young badgers have been recorded to disperse as far

J-9 as 68 miles from their natal ranges (Lindzey 2003). Diamond (no date) suggests that badgers may select sagebrush communities for dispersing outside their home range and that roads are one of the biggest mortality factors for badgers, which have few natural predators.

J-4
This comment also addresses isolated open space lots within Area A. It provides generic information regarding invasion of nonnative plant species. The Cumming Ranch Specific Plan encourages property owners to maintain native landscaping on their lots and requires a native plant palette for all common landscaping, as a project design feature. As detailed on pages 1-11 and 1-12 of the Draft EIR, the Landscape Concept Plan (LCP) prepared for the project uses native plant species appropriate to the individual areas of the project to provide a smooth transition from the developed pad areas to the surrounding natural setting. All plantings would be subject to the specified plant palette through the specific plan and the fire protection plan, and through restrictions of the site plan's LBZ.

An LBZ would be located between any lot that is adjacent to open space. As described under Limited Building Zones in Section 1.1.2 of the Draft EIR and required by Mitigation Measure M-BI-17a, exotic invasive landscaping is prohibited in the 100-foot LBZ, further minimizing the potential for invasive species to migrate from residential use areas to open space.

Activities within the project's open space areas have been minimized and include only the trail system and minor temporary disturbances for sewer line installation. The trail systems would be managed per the Resource Management Plan (RMP) (Appendix C of the Draft EIR) prepared for the project and would include removal of invasive species if deemed necessary as described in more detail under Response to Comment J-11 below. As detailed on pages 1-20 and 1-21 of the Draft EIR, any areas that would be temporarily disturbed during construction activities, such as utility installation, would be regraded to match the adjacent natural terrain and landscaped in accordance with the approved landscape plan, which would provide for vegetation similar in composition (e.g., hydroseeding) to the surrounding environment. The proposed hydroseed would consist of grasses and vegetation that would reintroduce native species back into the existing nonnative landscape.

In addition, the RMP for the project requires that surveys be conducted every 3 to 5 years to determine the distribution and abundance of nonnative invasive plant species that should be removed or controlled (Goal F.2 for Area A and Goal F.1 for Areas B and C).

J-5
This comment also addresses isolated open space lots in Area A. It provides general information regarding development effects on habitats and species, but does not address the environmental analysis in the Draft EIR. Indirect impacts and edge effects are analyzed in Section 3.1.3 of the Draft EIR and potentially significant impacts (Impacts BI-16 and BI-17) were identified and mitigated to less than significant through Mitigation Measures M-BI-16 and M-BI-17.

The research papers provided discuss nitrogen deposition effects on CSS, light pollution, exotic species impacts, and watershed impacts from urbanization. The following information supplements the discussion from Section 3.1.3. The project site is currently exposed to air pollution from automobiles from the adjacent SR 67 and Highland Valley Road and the project is not expected to increase this impact in an appreciable way.

The required native plant palette would reduce the amount of landscape irrigation necessary (as compared with typical, nonnative landscaping) as the plants would be appropriately adapted to the climate. In addition, the project shall comply with the County of San Diego's Ordinance on Water Conservation in Landscaping. These requirements would minimize the amount of necessary irrigation and residential lawn pesticide use. The project site is already exposed to chemical use from the ongoing farming operations onsite and adjacent residential uses. As described in Section 4.1.1, the drainage on the project site would not be significantly altered due to project development, and runoff levels would be essentially the same as current conditions.

Lighting would be prohibited in the LBZ (Mitigation Measure M-BI-17a), providing additional buffer between lighting associated with residential use and open space areas. Other provisions of project design would restrict lighting to reduce this potential edge effect, as detailed under Lighting in Section 1.1.2 of the Draft EIR, including no street lighting within the proposed project; exterior home lighting only within allowed parameters, such as motion lights, shutoff timers, and downshielding; and minimal lighting at the major entry points along Highland Valley Road and by entry signage.

The County acknowledges indirect effects may be associated with urban development on wildlife, including fertilizers, pesticides, and rodenticides, but also notes that these indirect effects have been occurring in Area A related to general agricultural use for many years. Furthermore, no fertilizers, pesticides, and rodenticides would be used in the large portion of the project proposed as open space, which would reduce the exposure of rodents and predators to these materials. To further minimize operational edge effects, Mitigation Measure M-BI-17 has been incorporated into the project.

J-6

This comment also addresses isolated open space lots within Area A. The County agrees that the extent of edge effects is variable and has identified lots A, B, D, and F as impact neutral, as noted in Response to Comment A-5. The comment does not provide specific detail concerning the project or project habitats. Refer to Response to Comment J-3 for the rationale for including Lots G, I, and J to provide mitigation acreage.

In addition, multiple design features have been included in the project to reduce potential edge effects. Some of these measures, as described in the analysis of edge effects in Section 3.1.3 of the Draft EIR, include lighting restrictions, natural buffer areas, natural barriers to discourage encroachment into open space areas, and minimal fencing. Open space lots are further buffered from residential edge effects by restrictions in the 100-foot LBZ required along the lot line adjacent to open space areas.

The proposed project site overlaps the southeast corner of the Ramona Grasslands Preserve and substantial consideration was given to maximize preservation of Areas C and B, while allowing for planned development. A 100-foot buffer to reduce edge effects is considered sufficient for rural residential development in the project setting with existing rural residential uses to the west, south, and east.

J-7

The comment recommends redirecting mitigation of habitat to within the future North County Pre-Approved Mitigation Area (PAMA). With the reconsideration of Lots A, B, D, and F to impact neutral status, all proposed upland mitigation is within the future proposed PAMA. Wetland mitigation within Area A was considered to be the best location based on hydrology and potential for increased wetland function and value. See Response to Comment B-5 for additional information on wetland mitigation within Area A.

J-8

The comment requests information on the linkage south to Barnett Ranch and the project potential effect. This linkage goes from the southern portion of Area B and southwest along Etcheverry Creek, across SR 67, south to County of San Diego property near Dye Road, south to large lot farming properties, and southeast to County of San Diego-owned Barnett Ranch. The project does not have any impacts to habitat north or south of SR 67 in the vicinity of this linkage (there are only minor impacts further west within the SR 67 right-of-way). The Biological Technical Report provided a detailed discussion of the wildlife corridors, including existing physical conditions, wildlife usage, and effects. The following information from the Biological Technical Report is provided to detail the effects on the wildlife corridor and connectivity.

From a landscape level approach, the Cumming Ranch is located at the southern edge of the Ramona grasslands. As such, the connectivity to open space lands to the south is partially restricted by rural 1 to 5-acre-sized developed parcels and the heavy presence of traffic along SR 67....To the southeast of Cumming Ranch, at the southern portion of Area B, is open grassland and agricultural lands that extend across SR 67 to the Barnett Ranch Preserve 9,500 feet away. However, these lands located east of SR 67 are proposed for residential and school developments. Connection to or from Cumming Ranch would be via

Etcheverry Creek and across or under SR 67. There is little or no cover or concealment habitat east of SR 67, other than the depth of drainages and tall grass or weeds. The nearest shrublands/woodlands to Cumming Ranch are approximately 1,500 feet to the southeast, while Etcheverry Creek is sparse in the available amount of cover and concealment and currently offers better protection for potential wildlife movements along the creek bottom. No large predator or prey sign was identified along the on-site portion of Etcheverry Creek. Small and medium sized animal movement does occur along Etcheverry Creek as evidenced by direct observations of amphibians, coyotes, and gray fox.

Within the Cumming Ranch TM, wildlife dispersal corridors and/or linkages are provided through Etcheverry Creek and the RPO drainages between the south side and the north side of Area A. Open space Lots D, F and J connect to Area B. Open space Lots A and B connect to Lot J. Wildlife corridors and connectivity within the project were designed to provide linkages through the site towards the large open space included in Area B. Lots G, I and J have been bisected by an internal road that serves only the residents in the development. Lots D, F and J also provide a substantial landscape for wildlife to funnel towards and between Area B within the Cumming Ranch.

The connection between the open space lots (Lots F and J and Lots A and J) would generally be via culverts under Highland Valley Road in which small animals would be able to access. The easterly drainage has a triple 4 by 8 foot box culvert with an overall width of 26 feet. There is a small 3-foot by 1.5-foot box culvert in the central part that provides for a small amount of drainage. The westernmost drainage has a 36-inch diameter pipe. The eastern and central culverts will be retained as currently constructed; however, the westernmost drainage will be replaced with at least a triple 4 by 8 foot box culvert system. According to Caltrans (2009), box or pipe culverts that are at least three feet high will support wildlife movement for medium sized mammals (fox, coyote, skunk, etc.), small mammals, reptiles and amphibians. The larger box culvert from A to J is currently restricted by 3-strand "cattle" fencing and large rip-rap boulders which may discourage some larger animals from access. As part of the project, the cattle fencing will be removed which will allow more wildlife to use this area. The only fencing in the future will be a wood rail fence for the pathway. This type of fencing allows small and medium mammals, amphibians and reptiles unimpeded access and passage. From a wildlife corridor and linkage perspective, these under crossings meet current design recommendations to support small and medium sized wildlife usage. Based on many years of data collection on the property, presence of most resident species is approximately 300 feet or greater from either side of Highland Valley Road. This may be due to the lack of suitable cover and the open agricultural lands on the south side of Highland Valley Road. The only animals observed to physically cross Highland Valley Road (not via the culverts) were coyote and long-tailed weasel.

Although the on-site connectivity from Area B is restricted, the Hardy Ranch is now under the ownership of the County of San Diego as part of their Parks and Recreation Department. With this additional adjacent off site open space, this wider area provides a better corridor for wildlife movement.

The onsite corridor provided is approximately 2,500 feet wide for this linkage. Offsite the linkage narrows to approximately 1,400 feet in the vicinity of the old farming buildings at SR 67. The large lot rural residential found to the south of the project north of SR 67 in the vicinity of the linkage would remain and the linkage would be maintained at approximately 1,400 feet. The width of this linkage would meet MSCP standards for all wildlife species.

The analysis in the Biological Technical Report also included a discussion of how the area would accommodate target species (including the target species):

In evaluating how each wildlife corridor or linkage currently accommodates movement by the selected target species, it is important to note that many factors come into play regarding "movement of wildlife." The evaluation needs to include the consideration of how likely the animal will encounter the entrance to the corridor or linkage, actually enter the corridor or linkage, and follow it to the end and into a new area of habitat. Additionally, it is important to consider whether there is sufficient concealing cover, food, and water within the corridor or linkage for the animal to reach the full length of the corridor or linkage, or whether such elements need to be created and maintained. Finally, specific impediments to movement within the potential corridor or linkage must be assessed, including topography, and psychological barriers such as roads and types of road crossings, fences, outdoor lighting, domestic pets, noise from vehicle traffic or nearby buildings, and other human impacts (Bond 2003). Soule' (Frankel and Soule' 1981) suggests that movement between nearby reserves (open space) is possible only for species (such as insects, bats, and birds) accustomed to traversing inhospitable landscapes, while many species (such as fish, amphibians, reptiles, and non-flying mammals) are ill-equipped for such travel. Roads, creating their own problems for wildlife movement, are potentially isolating influences of great consequence (California Wilderness Coalition (Missing Linkages) 2003) and may be overall predictors of the absence or presence of some species such as mountain lions (Thiel 1985; Van Dyke et al. 1986).

Given these factors in relation to the three target species (coyote, badger, and mountain lion), the only potentially functional wildlife movement corridors and/or linkages at the Cumming Ranch consist of Etcheverry Creek and Santa Maria Creek. The coyote, being the most generalist species of all, has been observed throughout the Cumming Ranch property, with multiple scat and tracks identified within Etcheverry and Santa Maria Creeks. Since the coyote is currently utilizing these drainages, it is assumed that this species will continue to utilize this

corridor/linkage for movement, dispersal, hunting, and resting. Since this cosmopolitan species can adapt to human presence, it is assumed that the coyote will travel at will, eastward along Santa Maria Creek and Etcheverry Creek and throughout the rural community of Ramona outside of a wildlife corridor. The badger, although observed within the southern portion of Area B, was not detected in other portions of the Cumming Ranch, nor was its sign. However, that does not indicate that this species is not currently utilizing both Etcheverry Creek and Santa Maria Creek for movement, dispersal, or hunting. Since the badger is not a riparian-related species its movements are primarily cross-country without the benefit of a true wildlife (i.e., riparian) corridor (Frankel and Soule' 1981). It is assumed at this time that the badger may only move as far east as SR 67, probably is not moving any further south than Highland Valley Road, and is moving north and northwest from Etcheverry Creek into the adjoining open lands. Although mountain lion scat was observed in Area A along the dirt roads and near the central hills, it cannot be ruled out that they are utilizing Etcheverry Creek and Santa Maria Creek for cover and concealment, movement, and dispersal. Although the mountain lion is not a resident species at the Cumming Ranch, it is assumed that mountain lion movements are similar to those described above for the badger, but that for the mountain lion, Etcheverry Creek and Santa Maria Creek (within the Cumming Ranch) function as a linkage.

Since water is an important factor, it is assumed that Etcheverry Creek is utilized more consistently for drinking water on-site since it typically holds water into the summer months. Other water sources on-site include a large vernal pool in Area B and the larger vernal pools within Area C, north of Santa Maria Creek that may hold water from early spring into the early summer months. The presence of mountain lions, deer, badgers, etc. indicates connection(s) are functioning.

Therefore, the effects of the project regarding wildlife movement and linkages were well quantified and addressed in the Draft EIR and associated Biological Technical Report.

J-9

Contrary to the comment's assertion, the biological technical documents include information regarding the site and its habitats as wildlife movement areas. As detailed in the Biological Technical Report prepared for the project;

American badgers were observed on-site within Area B, immediately south of Etcheverry Creek within a group of rock outcrops. Given this species territory size (1 to 1.5 square miles) it is likely that only one badger territory would occur on the Cumming Ranch TM. Based on current knowledge of this species, it is expected that the juvenile dispersed in the fall season to an area outside of its mother's home range (Messick and Hornocker 1981). Males are generally solitary outside of the breeding season. It is assumed that juveniles would disperse to the less populated areas north, southeast and/or west of the

Cumming Ranch TM. This species is associated with those habitats and wildlife corridors and linkages to be preserved within open space.

The comment indicates that badgers have been recorded to disperse through CSS and roadways are a mortality factor. The open space design of the project is superior with a large block of habitat preserved adjacent to the existing Ramona Grasslands Preserve. The Findings for the Habitat Loss Permit discuss the existing and natural fragmented nature of the CSS in the area being associated with isolated rocky hills amidst the grassy lowlands and this existing condition is known to be adequate habitat for Ramona badger. The project design does not change the pattern of the grassland/CSS habitats and provides adequate linkage, though the RMP may result in the selection of additional CSS and shrubland habitat over time. As discussed in J-8, the width of the linkage in the direction of Barnett Ranch would meet MSCP standards for all wildlife species.

In addition, Open Space Lot I has been modified to increase its connection to Lot J and Area B in such a manner to open the CSS grassland interface to 1,000 feet. Therefore, as related to badgers, linkages will be preserved within the proposed open space.

The project includes upgrades to the culverts to enhance wildlife crossing of Highland Valley Road within the project site. These upgrades include increased capacity and removal of cattle fencing. Also see Response to Comment J-8.

The culvert within SR 67 along Etcheverry Creek would be at the primary location for wildlife movement offsite. This culvert is offsite and under the control of Caltrans. While it may be beneficial to increase the capacity of the culvert under SR 67 at this location, the improvement to this infrastructure would be under the control of Caltrans. It is in a location greater than 1,000 feet from the onsite open space and the boundary of the project.

J-9 Cont

Mitigation could include widening the Primary Linkage through re-design of the development (see #5 below) as well as improvements to facilitate wildlife crossing of Highway 67, such as offsite fencing, revegetation, signs, improved culverts, and a roadway animal detection system intended to reduce wildlife-vehicle collisions (Gagnon et al. 2008). Bekker and Canters (1995) showed that providing fencing to guide badgers to culverts has nearly doubled the size of European badger populations in some regions. Monitoring the movement of badgers onsite, one of the priority species for connectivity monitoring in the region (SDMMP 2010), would provide important data for the future widening of Highway 67, which will require a net environmental benefit (TransNet Ordinance).

3. **Re-direct restoration funds from the interior of the residential areas in Tract A to open space in Tracts B and C to maximize habitat quality and functionality in the Ramona Grassland Preserve.**

J-10

Because the undeveloped areas in Tract A will not serve as biological open space once the development is built, restoration funds would be better invested in Tracts B and C which have been fairly disturbed. According to recent and historic imagery, there has been regular disking in Tract B south of Santa Maria Creek (2000, 2002, 2003, 2004, 2005, 2008) and in the vicinity of Etcheverry Creek in 2009. Disking has been implicated as the primary disturbance resulting in the loss of native perennial bunchgrasses from California's grasslands (Stromberg and Griffin 1996). Disking also likely reduces the presence of other native perennial plants through the destruction of the root system. Disking collapses the burrows of native burrowing animals including Stephens' kangaroo rat (SKR), burrowing owl, and California ground squirrel. The almost annual disking of the grasslands in Tract B has likely prevented natural recolonization of that area by native species. Tract B is thus a prime candidate for restoration (Z. Principe personal communication).

Tract C, while not as disturbed, would also benefit from habitat enhancement through targeted weed control (artichoke thistle, perennial pepperweed, tamarisk, arundo) and seeding. Fencing the creek would allow managed grazing (Z. Principe personal communication).

An assessment will need to be completed to determine the details of a restoration project in Tracts B and C. Elements could include removal of invasive nonnatives, a native revegetation component on heavier clay soils, installation of artificial burrows for burrowing owls, and managed grazing of appropriate soils for SKR. A well-tested method for native grasslands restoration of highly degraded sites is available from the California Native Grasslands Association. The method includes a prescription of weed control followed by seeding with native species. Management strategies to enhance SKR habitat has been well documented in western Riverside County by agencies such as the Riverside County Habitat Conservation Agency. (http://www.skrplan.org/skr_management.html)

4. **Relocate trails planned through the interior of the Ramona Grasslands Preserve to the perimeter of the preserve to be consistent with the County's framework management plan and minimize edge effects.**

J-11

The DEIR for the proposed project has not adequately analyzed the potential long-term impacts of recreational trails through the Ramona Grasslands Preserve. Furthermore, the trail plan is not consistent with the County's framework management plan, which requires that trials be located *in the least sensitive areas of the MSCP Preserve* (p.13, Framework Management Plan):

> *Locate trails along the edges of urban land uses adjacent to the MSCP Preserve, or the seam between land uses (e.g., agriculture/habitat), and follow existing dire roads as much as possible rather than entering habitat or wildlife movement areas.*

J-10

The comment recommends that restoration funds be spent to maximize habitat quality in the Ramona Grasslands Preserve. This comment does not address a specific issue regarding the environmental analysis provided in the Draft EIR. As described in the comment, agricultural activities on the project site have altered the native conditions of the site. However, the restoration being discussed is being required as project mitigation for impacts to wetlands. The comment suggests that grasslands be created and that would not allow the County to make the RPO finding that the mitigation for wetlands has resulted in the "no net loss" requirement. In addition, the mitigation includes preservation and a comprehensive Resource Management Plan, (RMP) that includes large-scale conservation measures as well as species protection and focused habitat creation/enhancement (wetlands). Areas B and C would be managed in accordance with the RMP for the project (Appendix C of the Draft EIR). As stated in the RMP, despite the current agricultural activity in these two areas, when the areas are transferred to the County or other entity, both Areas B and C will be treated as conservation easements and prohibit any activity that is not conservation oriented.

The Conceptual Revegetation Plan (Attachment D of the Draft EIR) proposes onsite mitigation for impacts to wetland habitat for a total of 3.48 acres within the southeastern portion of the project site and the planting of 30 native oak trees. As described in the Revegetation Plan, the proposed mitigation site offers an excellent wetland/riparian mitigation opportunity, as riparian functions in the proposed location are substantially degraded and no sensitive plant or animal species would be impacted by a restoration program. This location was chosen because of its access to irrigation and because the existing hydrology will support the planned planting palette and it will provide cover for wildlife where none exists now. Other potential restoration locations were found to be functioning at a higher level and were comparatively more pristine; thus, these locations would not benefit as greatly from enhancement. Implementation of appropriate restoration measures would significantly increase the ecological wetland function of the site. However, the wetland mitigation is also subject to wetland permitting, and the condition of approval will be written so, if the permitting agencies require wetland creation within Areas B and C, it could be done in lieu of that proposed in Area A.

J-11

Biological impacts due to use of the trail and pathway system are analyzed under Indirect Effects of Project Occupation in Section 3.1.3 of the Draft EIR. A potentially significant impact of trail use was identified due to possible encroachment into sensitive areas. Mitigation to reduce this impact to less than significant is provided in Mitigation Measure M-BI-17. The Final EIR has been updated to note that trails would be adjusted outside the required wetland buffer where feasible as determined through a location study to be done in conjunction

with the RMP. Final trail location would consider recommendations of the resource manager and would be to the satisfaction of the County Department of Parks and Recreation. Edge effects due to trail use are further minimized through management of the trail system as required by the RMP. The RMP outlines measures such as management in accordance with the Ramona Grasslands RMP, installing best management practices, executing a manure removal program, and providing invasive weed control, signage, public education, and stewardship programs (Goals C.1, C.2, D.2, and D.3 for Area A; Goals C.1, C.2, C.3, and D.1 for Areas B and C).

Since the previous response was provided, the FEIR has been further clarified regarding the procedures for adjusting trail alignment. An updated response to the information provided above states: the FEIR has been updated to include procedures for the trails to be adjusted away from the Santa Maria Creek wetland buffer where feasible as determined through a location study to be done prior to Final Map.

The trail system has gone through an extensive design process to minimize impacts to sensitive biological areas and County RPO areas. The trail system has been designed in accordance with local and regional trail planning documents including Ramona Community Trails and Pathway Plan and San Diego County Trails Program Community Trails Master Plan. The commenter is incorrect that the trail system is not consistent with the Framework Management Plan. Though the trail system does cross through open space areas within the property, the project site itself serves as a seam between developed areas and the large expanses of grasslands to the northwest. The project site has many urban uses surrounding the site such as the Ramona airport to the north, the Ramona Town Center adjacent to the east, SR 67 adjacent to and Highland Valley Road transecting the project site, and rural residential development adjacent to much of the project boundary. In response to this and other comments, the RMP will be amended to have the resource manager do a study to adjust the trail alignment away from sensitive resources, where possible. In addition, the staging area and the trails have been deleted from Area C and the Final EIR has been updated to require that trail alignments (and the proposed trail right-of-way in Area B) be adjusted in the field by the project engineer and a County listed biologist to remain outside of the wetland buffer and vernal pool watershed areas, and when constructed, be placed in the least damaging location as determined in the field by the Cumming Ranch resource manager. If the trail is constructed in Area B, the resource manager will adjust the trail alignment to the satisfaction of the County DPR and USFWS in accordance with the Public Access Plan and Ramona Grasslands RMP.

Since the previous response was provided, the FEIR has been further clarified regarding the procedures for adjusting trail alignment. An updated response replaces a portion of the above response: In response to this and other

comments, a study will be done to adjust the future trail in Area B away from Santa Maria Creek, where possible. In addition, the staging area and the trails have been deleted from Area C. If the trail is constructed in Area B, the resource manager will provide management and monitoring of it to the satisfaction of the County DPR and USFWS in accordance with the Public Access Plan and Ramona Grasslands RMP.

J-12

There is increasing evidence that even passive recreation along public trails can have substantial impacts to community composition in preserve areas. For example, Reed and Merenlender 2008 conclude that for moderately-sized protected areas (50-2000 ha) near urban development, the key variable determining level of use by native carnivores was whether or not the site is open to public access. Non-native carnivores increased with public use, potentially altering the trophic structure of the ecosystem (Crooks and Soulé 1999). Taylor and Knight 2003 documented wildlife avoidance behaviors in response to recreational use.

J-13

Human use of recreational trails in reserve areas has also been associated with changes in bird species composition and a reduced frequency of nesting in the vicinity of trails. Miller et al. 1998 documented significant flushing responses of two species of ground-nesting grassland songbirds (vesper sparrows and western meadowlarks) to people and dogs on- and off-trail and recommended designing trails to avoid sensitive habitats such as grasslands.

J-14

J-15

The Ramona Grasslands is renowned for its raptor populations, which prey on the substantial rodent populations in the preserve. Thus, application of rodenticides in residential areas could have cascading impacts on the food chain of the preserve. Human recreational activities in foraging areas and roads can also impact the distribution, nest-occupancy rates, and reproductive success of breeding raptors. Martinez-Abrain et al. 2008 observed that perching distances of raptors (rough-legged hawks, northern harriers, golden eagles, prairie falcons, bald eagles) from riparian corridors increased significantly when a trail was present versus no trail.

J-16

5. **Remove the road on the northeast side of the knoll and relocate some of the lots to:**
    - **Provide a topographic buffer between the residential areas and the Ramona Grasslands Preserve.**
    - **Increase the area of biologically functional open space within the Ramona Grasslands Preserve by adding undeveloped area "I" (358.7 acres) in Tract A to the larger preserve and reducing the amount of edge-affected area in undeveloped area "J" by at least 10 acres (Figure 1-5).**
    - **Improve the Primary Linkage that crosses Highway 67 by the addition of undeveloped area "I" (358.7 acres) in Tract A (Figure 1-5) and removing the road around the knoll, thus decreasing potential wildlife mortality in the preserve.**

Eliminating the northeastern part of the loop road that branches off of Highland Valley road to the north would require relocating at least 8 lots (Lots 102-109). These could be relocated to the small undeveloped areas that do not serve as functional biological open space, for example areas *D, E, F, and G (Figure 1-5) in Tract A.*

Thank you for the opportunity to comment. Please call if I may clarify any of my comments.

Sincerely,

Jerre Ann Stallcup, M.A.
Conservation Biologist

cc: Ms. Maggie Loy

J-12

The comment addresses the issue that trails have an adverse effect on wildlife and recommends that the trails be placed on the perimeter of the preserve. It is acknowledged that human activity in a preserve area can affect wildlife behavior, including passive activities such as trail use. However, to reduce the impacts, access will be directed to areas with the least environmental sensitivity. Signage and barriers where needed will also help reduce potential effects (trampling of habitat, disruption of nesting, rearing of young, etc.). The project has mitigated direct and potential indirect effects related to trails by providing access in the lesser sensitive areas and providing measures to reduce unauthorized intrusion into more sensitive areas (e.g., signage, fencing, natural barriers) as described in Section 1.1.2 of the Draft EIR. Additionally, trails in Area C have been deleted and additional surveys will be done to adjusted trails outside wetlands, wetland buffers, and vernal pool watersheds as a condition of approval and in conjunction with the RMP tofurther minimize impacts to sensitive resources.

Since the previous response was provided, the FEIR has been further clarified regarding the trail surveys to be done prior to approval of the Final Map. An updated response replaces a portion of the above response: Additionally, trails in Area C have been deleted and additional surveys will be done prior to approval of the Final Map to adjust the trail in Area B to further minimize impacts to sensitive resources.

The areas that are most sensitive to human intrusion are those areas that support nesting activities. Activities in proximity to an active nest can cause the adult birds to abandon the nest. This can result in the loss of that nest and mortality of the young if the young have not fledged. While reducing human intrusion is best for wildlife, if not provided, human access to natural areas without trails can cause greater damage. The EIR has identified that the trail will be designed to avoid sensitive resources; as noted above, final trail alignment will incorporate appropriate adjustments based on avoidance of sensitive resources. As such, habitat that supports high-quality nesting can be avoided. Human intrusion can be minimized. Additionally, it should be noted that, since the area will not have amenities, the most likely people who will be accessing the natural areas will be local residents and other people wanting to experience the natural areas. As such, it would not be expected to draw large numbers of visitors. In conclusion, recognizing that people will find access to this area, the trails will be designed to avoid sensitive areas and combined with signage/education for protection for the biological resources. The proposed trail system is mitigated to less than significant.

Since the previous response was provided, the FEIR has been further clarified regarding trail implementation and management. The trail system has been designed to avoid sensitive areas, would include a signage/educational program, and be managed through the RMP. Therefore the EIR correctly concludes that

the potential for impact to biological resources from the proposed trail system is mitigated to less than significant.

J-13
As noted in J-12, this comment continues the discussion of effects trails have on wildlife.

J-14
As noted in J-5, indirect effects are associated with rodenticides. The County does not have any regulatory authority to prohibit use of these materials, as long as they are stored, transported, and used in accordance with established regulations (e.g. Federal Insecticide, Fungicide, and Rodenticide Act).

J-15
The trails proposed in the plan are not located in proximity to any known raptor nesting sites for rough-legged hawks, northern harriers, golden eagles, prairie falcons, or bald eagles. A white-tailed kite nest was found in 2011 at Hardy Ranch adjacent to Area C. Area C is proposed for preservation, which would benefit raptors nesting and foraging in this location in the future. An analysis of potential impacts to nesting and foraging raptors was conducted in 2011. This study determined that less than significant impacts would occur to foraging raptors from passive recreational trail use. Furthermore, it must be recognized that Areas A and B of Cumming Ranch and the adjacent Hardy Ranch are not pristine biological areas. These areas have been farmed for more than 50 years and many of the proposed trails have been used as farm roads. Some of the area surrounding the Ramona grasslands has been developed. Cumming Ranch is located adjacent and west of the Ramona Town Center and approximately 0.25 mile north of the intersection of SR 67 and Highland Valley Road in the community of Ramona. Highland Valley Road bisects the southern portion of the property. The property is bordered to the north by the Ramona Airport, to the south by rural residential development, to the east by the Ramona Town Center and rural residential development, and to the west by rural residential development. The Santa Maria Sewer Treatment Plant of the Ramona Municipal Water District is located on a parcel that is inset along the eastern boundary of the property. Indirect effects from these uses already exist within and around the project site. The trails and staging area in Area C were removed from the project.

Since the previous response was provided, additional information has been added to the EIR to clarify that the white-tailed nest that was found in 2011 in the area adjacent to Area C was located about 450 feet away from the proposed trail located in Hardy Ranch. It should also be clarified in the above comment that both Areas B and C are proposed for preservation, which would benefit raptors nesting and foraging.

J-16

Similar to the suggested redesign of the project, the Draft EIR considered an alternative that removed the road and lots surrounding the main knoll in Area A and moved lots to south of Highland Valley Road. This Clustered Development Alternative was found to have less biological impacts but greater impacts in other issue areas.

While the open space lots referenced in the comment may not provide high biological value, the open space lots have been specifically designed around unique features of the project site, such as stands of Engelmann oaks, rock outcroppings, cultural resources, or geologic features, and thus allowing these elements to remain as part of the landscape and visual environment of the property. In addition, they provide high aesthetic value important in keeping the open and natural feel of the project site. Placing residential lots on these open space areas may have positive biological results in the northern portion of the property, but would have negative effects to other resources currently preserved by those open space lots.

Wildlife mortality on the internal residential road near the center knoll in Area A is expected to be minimal as this small public residential road provides access only to the residential lots in the northern portion of Area A. No through traffic would use this road as it serves only the residential homes and speeds would be very low. Because the traffic volume on this road would consist only of residents and their guests with low speeds through the residential neighborhood, wildlife mortality due to vehicles would be less than significant.

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From: Dan Silver [mailto:dsilverla@me.com]
Sent: Monday, December 20, 2010 4:31 PM
To: Ramaiya, Jarrett
Subject: Cumming Ranch

Dec. 20, 2010

VIA ELECTRONIC MAIL ONLY

Larry Hofreiter
Dept of Planning and Land Use
5201 Ruffin Rd., Suite B
San Diego, CA 92123

Dear Larry:

The Endangered Habitats League (EHL) is pleased to provide comments on the Cumming Ranch Project. Via this transmittal, we are also conveying comments from the Conservation Biology Institute.

It is respectfully requested – and much appreciated – that you confirm your receipt of *both* of these letters via reply message.

K-1

As always, EHL wishes to work with DPLU in resolving our concerns. To this end, I will schedule a call with Maggie Loy when convenient for her.

With best wishes for the Holidays and New Year,
Dan

Attachments:

Letter from Michael Fitts, EHL Staff Attorney, dDec. 20, 2010
Letter from Jerre Stallcup, Conservation Biology Institute, Dec. 14, 2010

Letter K
Endangered Habitat League

K-1
This comment provides a cover letter that does not raise issues related to the Draft EIR and no response is necessary. There are two attachments referenced. The first attachment is the letter from the Endangered Habitat League that is addressed in the following Letter K responses. The second attachment is a letter from the Conservation Biology Institute, which is included and responded to independently as Comment Letter J.

December 20, 2010

Mr. Larry Hofreiter
Department of Planning and Land Use
County of San Diego
5201 Ruffin Road, Suite B
San Diego, CA 92123

RE: DEIR for Cumming Ranch: GPA 03-007; SP 03-005; TM 5344; STP 10-007; REZ 07-002, LOG NO. 03-09-028

Dear Mr. Hofreiter:

K-2 The Endangered Habitats League (EHL) submits the following comments on the Draft Environmental Impact Report (DEIR) for the above project. As we explain in more detail below, the environmental document fails to provide substantial evidence that significant impacts to biological resources have been mitigated to insignificant levels.

While the County and project applicant are to be commended for the preservation of Area C and partial preservation of Area B as part of the Ramona Grasslands Preserve, this does not fully compensate for the loss of significant habitat in Area A. The loss of functioning natural communities include "inland form" San Diegan coastal sage scrub, chaparral, and willow scrub. Recognizing this, the DEIR and supporting biological studies provide for mitigation of these losses primarily through preservation of "islands" of remnant open space that would be surrounded by development throughout Area A.

K-3 These isolated islands, however, cannot function as mitigation for the identified losses. Conservation Biology Institute biologist Jerre Stallcup—one of the architects of the County's MSCP—points out that these patches of vegetation cannot be credited with mitigation due to their isolation and small size, combined with the long-term edge effects from adjacent development. Stallcup notes that,

> "These patches of habitat, while a visual benefit for the project, are too isolated and small to function as biological open space. Over time their conservation values will be diminished by edge effects of the surrounding development, which decrease the net, biologically functional area of habitats left undeveloped."

K-4 (Letter to Larry Hofreiter of DPLU from Jerre Stallcup, Conservation Biology Institute, dated December 14, 2010, at p. 1.) The DEIR does not adequately account for the long-term degradation of habitat from edge effects when it concludes that this mitigation will reduce project impacts on biological resources to below significant levels.

K-2
Opening comments are noted. Since the comments do not specify how the Draft EIR fails to provide substantial evidence to support significance findings, no response is necessary.

K-3
As recommended by the U.S. Fish and Wildlife Service and detailed in Response to Comment A-5, the Final EIR has been modified and mitigation for the project will be accomplished in Open Space Lots G, I, and J of Area A, and within open space Areas B and C. The letter from Jerre Stallcup referenced within this comment is included and responded to as Comment Letter J.

K-4
As described in Response to Comment A-5, the smaller isolated open space lots in Area A are no longer included as part of the required mitigation acreage. The Final EIR has been modified to require the mitigation acreage to be located elsewhere within the project site.

Public Resources Code §21102 requires the County to adopt feasible mitigation measures to substantially lessen or avoid otherwise significant adverse environmental impacts. (PRC §21102, 21081(a), CEQA Guidelines §15002(a)(3), 15021(a)(2), 15091(a)(1)). To effectuate this requirement, EIRs must set forth *adequate* mitigation measures that decision makers can adopt at the final stage of the process. (Pub. Res. Code §21100(a)(5), CEQA Guidelines §15126(c)). Specifically, the CEQA Guidelines require that,

K-5

> "[m]itigation measures *should be capable of*: (a) avoiding the impact altogether by not taking a certain action or parts of an action; (b) minimizing impacts by limiting the degree or magnitude of the action and its implementation; (c) rectifying the I impact by repairing, rehabilitating, or restoring the impacted environment; or (d) reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action."

(CEQA Guidelines §15370, emphases added.)

K-6

The mitigation for biological resources proposed in the DEIR does not meet this standard. The DEIR and supporting appendices contain nothing to counter the overwhelming biological evidence, a sampling of which is cited in the Stallcup letter, that the small, isolated patches of habitat surrounded by residential development relied on for mitigation here will not be capable of reducing the Project's impacts on specific biological communities over the long term to a level of insignificance. The DEIR must be revised to address this shortcoming, preferably by a project redesign that would enhance the mitigation package.

K-7

Thank you for your attention. We will follow up to see if we can help identify ways to address our concerns.

Respectfully submitted,

Michael D. Fitts
Staff Attorney

Enclosure

Letter to Larry Hofreiter from Jerre Stallcup, Conservation Biology Institute, dated December 14, 2010

K-5
This comment cites CEQA requirements to consider adequate mitigation measures. No comment on the analysis or competency of the Draft EIR is included and no response is required.

K-6
Refer to Response to Comment A-5. The provision of mitigation elsewhere within the property is considered adequate to mitigate the project's impact on sensitive habitats. See Response to Comment J-3.

K-7
Closing comments noted.

MUSSEY GRADE ROAD ALLIANCE

"Preserving Historic Mussey Grade"

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December 20, 2010 **BY EMAIL**

Mr. Larry Hofreiter
Department of Planning and Land Use
County of San Diego
5201 Ruffin Road, Suite B
San Diego, CA 92123

RE: Mussey Grade Road Alliance Comments on the Proposed Cumming Ranch Project (GPA 03-007; SP 03-005; TM 5344; REZ 07-002, LOG NO. 03-09-028; SCH NO. 2004031136)

Dear Mr. Hofreiter:

L-1 The Mussey Grade Road Alliance submits the following comments in connection with the Cumming Ranch Project.

L-2 L-3

1. **Traffic Issues** The proposed project will add severe and immitigable traffic impacts to Ramona. The addition of 125 new homes resulting in 930 additional vehicle trips (ADTs) per day will further degrade Ramona's overburdened traffic infrastructure, and especially State Highway 67. As there is no plan presently to upgrade the Level of Service (LOS) rating of F on Highway 67, allowing additional development-driven impacts to Highway 67 on the basis of an overriding consideration in order to accommodate this project would, in effect, unfairly burden all Ramona commuters for the benefit of the applicant. Moreover, Highway 67 is one of the most dangerous roads in San Diego County, as DPLU staff well know. Requiring an inadequate road to accommodate additional traffic imposes additional safety risks on road users. As it is foolhardy to continue to build out major projects until traffic infrastructure issues are addressed, the Alliance objects to the increasing of safety hazards and the overcrowding of Highway 67. The additional traffic would also impede our own community's evacuation in the event of another catastrophic wildland fire as more cars are added to the road that is unable to handle the traffic today. For this and other

Letter L
Mussey Grade Road Alliance

L-1
This comment provides introductory statements to the letter. No response is necessary.

L-2
The comment is not specifically related to the adequacy of the Draft EIR. It does not contradict information presented in the Final EIR. The County of San Diego acknowledges that portions of the SR 67 corridor have traffic operating conditions of LOS F. Long-term plans are in place to expand capacity on SR 67; however, funding and a construction schedule are not complete at this time. The traffic generated by the Cumming Ranch project would add additional traffic to SR 67 and other surrounding roadways. However, as detailed in Section 2.1.5 of the Draft EIR, as mitigation for impacts, the proposed project would be required to make physical road improvements and contribute funds for improvements planned for the SR 67 corridor that would improve operation and safety. Caltrans concurs with proposed mitigation required for this project; see Comment Letter C. In addition, project mitigation required prior to occupation of the project, such as improvements to the SR 67 and Highland Valley Road intersection, would serve to improve traffic operating conditions along the roadway by reducing queue times at the signal and providing more appropriate turn lanes; see Response to Comment G-2.

L-3
The County acknowledges that the project has significant direct and cumulative impacts to Highway 67 (Impacts TR-1a and 3a), which are not fully mitigated. However, the mitigation would reduce the travel time and improve the arterial speed compared to the existing conditions (see Table 2.1-6: Roadway Segment Operations with Improvements). While SR 67 will continue to operate at LOS F, the analysis demonstrates that the road will have more capacity with the project compared to the existing conditions (without the project). As detailed in the Section 2.1 of the Project EIR, project mitigation is required prior to occupancy of the project and includes improvements to the SR 67/Highland Valley Road and the SR 67/Mussey Grade Road intersections, which will improve traffic operating conditions along SR 67. The mitigation would also improve traffic capacity during an evacuation.

CEQA Guidelines Appendix G includes a "threshold" related to emergencies (see Appendix G Section VIII(g)). Neither the CEQA Guidelines nor the County guidelines identify a proposed project's effect on emergency evacuation traffic as a topic to be analyzed under CEQA. The potential effect would depend on a number of unknown variables such as the size of the geographic area that may

be subject to the emergency evacuation, the amount of time allowed for an evacuation, the number of lanes available for evacuation, amount of traffic, type of emergency, weather, public response to the emergency, and so on.

In addition to road capacity improvements, evacuation planning has greatly improved. With the experience of the 2003 and 2007 wildfires, the process of evacuation has become a coordinated countywide response by Law Enforcement (County Sheriff), the County Office of Emergency Services (OES), and the Fire Authority. OES sets up a command center to issue evacuation orders and, in the case of a fire emergency, the fire planning officials map and predict fire behavior to issue timely evacuation orders in reverse 9-1-1 calls. The Sheriff is in charge of the "on-the-ground" response including directing traffic flow to move traffic in the most expeditious manner, including the discretion to override intersection controls and directional lanes.

In 2005, Ramona developed a Community Protection and Evacuation Plan that covers the Ramona Community Planning Area. The plan provides for an active group of stakeholders and agencies to aid and provide communitywide resources, including emergency response and alert and notification plans. The plan divides the community into four regions and designates the evacuation routes most beneficial for safe and effective escape depending on the direction of the oncoming danger. The plan also provides strategies and plans for a variety of emergencies, but specifies wildfire as the most critical. It also designates safety zones, such as golf courses and baseball fields. Approximately 500,000 citizens were evacuated countywide during the October 2007 wildfires, and that effort was regarded as highly successful. While many citizens were delayed on roadways in the Ramona area, none who followed the evacuation plan were injured or perished. This project does not interfere with the operation of the Community Protection and Evacuation Plan because the plan is updated on a regular basis (typically every 2 years) to account for changes in the community. Combined, the road improvements and the project's participation in the Community Protection and Evacuation Plan would preclude a significant impact to the emergency evacuation plan.

L-3 cont

safety factor reasons, the addition of further traffic to an F graded road is an unmitigable impact.

L-4

2. **Environmental Impacts on the Ramona Grasslands** Over 99% of California's native grasslands have already been lost. Ramona is fortunate enough to have one of the few remaining natural grasslands in the entire state. This remarkable resource should not be sacrificed to the planned build-out of Cumming Ranch, which would degrade the ecosystem. In fact, the entire Area A, including hills, scrub, and grasslands/wetlands, in addition to the grasslands and riparian habitat of Areas B & C, are known foraging areas for numerous raptors, including the Golden Eagle, Bald Eagle, Red-Shouldered hawk, Ferruginous hawk, Coopers hawks, White-tailed Kites, Turkey Vultures, Red-tailed hawks, Kestrels and owls, to name a few. Reducing this valuable and irreplaceable natural habitat with clusters of suburban homes will destroy a key portion of useful forage and nesting areas to wildlife. Loss of this forage/nesting habitat means a loss of vital biological resources for both the community of Ramona and for the County of San Diego and is an unmitigable impact.

L-5

3. **Unwarranted Sewer System Expansion** The planned expansion of the Ramona sewer system will result in additional future development pressures on the rural character of Ramona, including the entire west end of Ramona. The development of the Cumming Ranch Project should not be considered in isolation to the immense effects of the first major expansion of the sewer system in Ramona in years. The expansion will have cumulative impacts that have not been taken into account in the environmental documentation and which will adversely impact the rural character of Ramona. The cumulative effect of the expansion of the sewer system is an unmitigable impact.

L-6

4. **Aesthetic Change of Character** Finally, the proposed project would change the very character of the entrance to Ramona. Instead of the scenic views lining Highway 67 and including pristine hills and grasslands, the character of our unincorporated town (which is older than many incorporated areas of San Diego County) would be forever changed by the addition of a suburban neighborhood at the gateway of the community. The aesthetic value of the present entryway into Ramona would be forever destroyed by this incongruous development and the loss of this community character aspect of Ramona is an unmitigable impact.

Sincerely,

/s/ *Diane Conklin*

Diane J. Conklin
Spokesperson
Mussey Grade Road Alliance

cc: Mussey Grade Road Alliance Board of Directors
Supervisor Dianne Jacob

L-4
The comment is not specifically related to the adequacy of the Draft EIR. It does not contradict information presented in the Final EIR. The comment reaches a conclusion of unmitigable impact but does not provide the rationale. The County acknowledges the importance of the Ramona grasslands and the biological functions they provide. As such, the County has been active in the effort to preserve the Ramona grasslands and has participated in the formation of the Ramona Grasslands Preserve. The Ramona Grasslands Preserve is discussed in detail under Project Background Information in Section 1.1.2 of the Draft EIR and the Cumming Ranch project would make available a total of 457.4 acres (67 percent of the property) of open space for inclusion in the Ramona Grasslands Preserve. Section 3.1 of the Draft EIR provides detailed analysis regarding wildlife species, including bird and raptor species on the project site and within the surrounding grasslands and found that potential impacts would be mitigated to less than significant by avoiding the most important biological resource areas and providing mitigation land that will contribute to the Ramona Grasslands Preserve.

L-5
The comment relates to what the commenter calls "the first major expansion of the sewer system." However, the RMWD has approved a master plan and Final EIR for expansion of the Santa Maria Waste Water Treatment Plant and the Cumming Ranch project would be consistent with the master plan. The comment states the impact has not been analyzed and reaches a conclusion of unmitigable impact but does not provide the rationale for that statement. Growth-inducing Effects, Section 1.7 of the Draft EIR, provides the analysis of the potential for the sewer expansion into the project site to result in or facilitate additional growth. The analysis accounts for the offsite infrastructure into the adjacent Hardy Ranch as well as the Spirit of Joy church project. The analysis found that the project would not create significant growth due to sewer expansion or other means. The comment does not specify what other cumulative impacts have not been taken into account by the Draft EIR.

L-6
The comment expresses an opinion related to the visual impacts of the project. It does not contradict information presented in the Final EIR. The comment reaches a conclusion of unmitigable impact but does not provide the rationale. The Draft EIR found visual impacts from the proposed project to motorists on SR 67 would be less than significant. Views from SR 67 were considered in Key Views 1 and 2 as described in Section 3.4 of the Draft EIR and shown in the visual simulations provided in Figures 3.4-3 and 3.4-4. The project has been designed with large open space lots (Lots A and B) between SR 67 and planned development that would minimize the future view of residences from the roadway. Physical features onsite, such as stands of trees, boulders, etc., are

incorporated into the residential lots' design (refer to Site Plan). Major ridgelines, larger groups of rock outcroppings, heavily wooded areas, and major drainage areas on the property are preserved and included within open space areas or restricted use areas. The use of native plantings within the landscape plan and Site Plan is also required for adjoining open space lots and preserve areas. Additional visual buffering from SR 67 would be afforded by the proposed vegetation enhancement and restoration along a drainage between SR 67 and the area of development south of Highland Valley Road as shown in Figures 3, 4a, and 4b of the Conceptual Revegetation Plan, Appendix D of the Draft EIR.

The Nature Conservancy
Protecting nature. Preserving life.

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December 20, 2010

Ms. Maggie Loy
Department of Planning and Land Use
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San Diego, CA 92123

RE: Cumming Ranch Draft Environmental Impact Report (DEIR)

Dear Ms. Loy:

M-1 The mission of The Nature Conservancy ("Conservancy") is to preserve the plants, animals and natural communities that represent the diversity of life on Earth by protecting the lands and waters they need to survive. To achieve this mission in California, the Conservancy has worked extensively over the last sixty years with public resource agencies, communities, landowners and various other public and private partners to protect many of the State's most ecologically significant natural areas. One such State-level priority area is the Ramona Grasslands.

M-2 Significant conservation investments have been made in the natural areas of the Ramona Grasslands, where the proposed Cumming Ranch project is located, as well as in lands to the southeast of Highway 67. Over the last several years, the Conservancy has partnered with San Diego County and other government agencies to create the Ramona Grasslands Preserve, which is located immediately adjacent to the project to the northwest. The Conservancy has also recently led efforts with the California Department of Fish and Game to protect and establish the Cañada de San Vicente Preserve, which combined with the County's Barnett Ranch Preserve forms a large core habitat area less than 2 miles southeast of the subject project. Total investment in the area from Federal, State and County government sources as well as the Conservancy of more than $60 million in public and private funding will potentially be negatively impacted by the proposed Cumming Ranch project.

M-3 Given its location relevant to these significant conservation investments, the Conservancy is very concerned about the project and the mitigation plan as articulated by the project proponent. **We ask San Diego County to thoroughly address the impacts of the proposed project on both the existing conservation investments in the Ramona Grasslands as well as the Pre-Approved Mitigation Area ("PAMA") of the North County Subarea Plan of the Multiple Species Conservation Program ("North County MSCP").**

M-4 In particular, the following points as stated in the DEIR should be clarified or reconsidered:

1. **The lands surrounded by the proposed development, which are designated as open space in Area 'A', should not be counted as biological mitigation.** Open space lots A-J in Area 'A' provide important viewshed and quality of life benefits to people. However, extensive research, including studies conducted in San Diego County, has demonstrated that small habitat fragments support fewer species than larger fragments and large core reserves. Small habitat fragments are exposed to very high levels of edge effects resulting in the native species being subject to very high rates of human influence. Residential occupation brings a suite of activities that degrade habitat and directly kill native species. People clear habitat for fire safety and recreational activities. Pets, especially domestic cats, are very excellent predators killing birds,

Letter M
The Nature Conservancy

M-1
The comment provides an opening statement and description of the commenting organization. No response is necessary.

M-2
The County acknowledges the Conservancy's planning and conservation efforts related to the Ramona Grasslands and to the Canada de San Vicente Preserve, 2 miles to the southeast. The County has also been active in the effort to preserve these land holdings and has participated in each. As part of the Ramona Community Plan, the Cumming Ranch Specific Plan Area has been planned for development for many years, as discussed in the Land Use Section of the Final EIR (Section 4.1.4). The project's part within the Ramona Grasslands Preserve is discussed in detail under Project Background Information in Section 1.1.2 of the Draft EIR. The Cumming Ranch project would designate 457.8 acres as open space and 439.7 acres within the area proposed as future PAMA for the draft North County MSCP. Biological Resources, Section 3.1 of the Draft EIR, provides detailed analysis regarding the project site and its contribution to the surrounding grasslands and found that biological impacts would be less than significant with appropriate mitigation, according to the County Guidelines for Determining Significance.

M-3
The comment regarding the project's location relevant to future PAMA for the draft North County MSCP is noted. No issue related to the adequacy of the Draft EIR is raised in the comment and no response is necessary.

M-4
As recommended by the U.S. Fish and Wildlife Service and detailed in Response to Comment A-5, the Final EIR has been modified and all mitigation for the project will now be accomplished in Open Space Lots G, I and J of Area A, and within open space easements of Areas B and C. All of these areas are within future PAMA for the draft North County MSCP, and all of these areas are suitable mitigation sites (see Response to Comment J-3). Multiple design features have been included in the project to reduce potential edge effects. Some of these measures, as described in the analysis of edge effects in Section 3.1.3 of the Draft EIR include lighting restrictions, natural buffer areas, natural barriers to discourage encroachment into open space areas, and minimal fencing. Open space lots are further buffered from residential edge effects by the 100-foot LBZ required along lot lines adjacent to open space areas. These design measures would aid in minimizing any potential edge effects. The comment does not provide a rationale or reference for its assertion related to edge effect distance, so no response is possible.

M-4 Cont

reptiles and small mammals. As with domestic animals, the effects of pesticides, noise pollution and light pollution extend into habitat fragments killing or altering the behavior of native species. Researchers estimate that edge effects extend a minimum of 650 feet from the edge of human residential occupation into open space areas. The minimum distance of open space lots A-J from the edge of residential lets in the proposed project is approximately 600 feet. As a result, all mitigation and associated credit for the same should be directed toward the open space in Tracts B and C.

M-5

2. **The proposed project impacts a portion of the PAMA for the North County MSCP.** The PAMA within the project connects the Ramona Grasslands to conserved lands to the southeast, including Barnett Ranch Preserve and Cañada de San Vicente Preserve. This connection is of regional importance as it links large core habitat areas in the North County MSCP and the South County Subarea Plan for the MSCP. The DEIR does not adequately address impacts to this important connection. Furthermore, while the DEIR acknowledges that the two creeks (Etcheverry Creek and Santa Maria Creek) are assumed to function as movement corridors, it does not account for the fact that grassland species, such as badgers, do not necessarily use creeks for movement.

M-6

M-7

3. **As the project will increase local traffic, mitigation should include enhancements to this corridor to facilitate wildlife crossing of Highway 67.** Mitigation should include offsite directional fencing, revegetation, and improved crossing structures, including retrofitting existing culverts to facilitate wildlife movement and installing additional wildlife friendly culverts where needed.

M-8

4. **The project should direct all habitat enhancement to the functional open space in Areas 'B' and 'C' and not to the small patches of open space areas in Area 'A'.** Mitigation funds should be expended on the large open space areas of the project that are contiguous with the existing Ramona Grasslands Preserve. Open space areas in Area 'A' are more or less surrounded by development and will not support rare and covered species in the future as a result of fragmentation and edge effects. Additionally, a review of aerial images from the past decade reveals ongoing disturbance of the grasslands in Areas 'B' and 'C'. As a result, habitat enhancement focused in these areas will have the greatest benefit for species outside of areas that will be degraded by edge effects.

M-9

5. **The project should relocate residential lots 102-109 to the area immediately north of Highland Valley Road (southern portion of open space lot J).** Relocation of these residential lots would allow the hills in Area 'A' to naturally buffer the large remaining open space from the development and reduce the overall area of the project's open space exposed to detrimental edge effects. Additionally, the habitat value of the southern portion of open space lot J will significantly degrade through time as it will become surrounded by residential lots. The edge effects on this habitat fragment will be intense as the minimum distance from the residential lots will be significantly less than 650 feet or the minimum distance edge effects have been shown to influence habitat fragments.

M-10

Thank you for the opportunity to comment. Please call if I may clarify any of my comments.

Sincerely,

Zachary Principe

M-5
The comment regarding the project's location relevant to future PAMA for the draft North County MSCP is noted, and the EIR has been revised to include this information (see Section 3.1.1). However, the County disagrees that the EIR did not adequately address the importance of the connection provided by Etcheverry Creek from onsite Area B to the Barnett Ranch Preserve to the southeast. Wildlife corridors are described in Section 3.1.1 of the EIR and potential impacts were evaluated in Section 3.1.3 under significance guideline #6. Potential direct and indirect impacts to wildlife corridors and linkages were determined to be less than significant because the project design retains the major connection along Etcheverry Creek. This connection is more than 1,000 feet wide, which meets the functional criterion set by the MSCP. Note that the South County MSCP begins south of Dye Road and this rural area is labeled as a "Take Authorized" area, in part because the Barnett Ranch was purchased after the MSCP was adopted. Also see the Response to Comment J-8 above.

M-6
The Biological Technical Report specifically discusses grassland species, including badgers and their movement through the project site. The wetlands in the Ramona Grasslands area are not typical riparian areas; they are largely open and dry, except during rain events, and largely suitable for badger use. The quoted text from the Biological Technical Report below specially notes that the badger is not a riparian-related species and moves primarily cross-county.

The badger, although observed within the southern portion of Area B, was not detected in other portions of the Cumming Ranch, nor was its sign. However, that does not indicate that this species is not currently utilizing both Etcheverry Creek and Santa Maria Creek for movement, dispersal, or hunting. Since the badger is not a riparian-related species its movements are primarily cross-country without the benefit of a true wildlife (i.e., riparian) corridor (Frankel and Soule' 1981). It is assumed at this time that the badger may only move as far east as SR 67, probably is not moving any further south than Highland Valley Road, and is moving north and northwest from Etcheverry Creek into the adjoining open lands.

As detailed in the Biological Technical Report prepared for the project;

"American badgers were observed on-site within Area B, immediately south of Etcheverry Creek within a group of rock outcrops. Given this species territory size (1 to 1.5 square miles) it is likely that only one badger territory would occur on the Cumming Ranch TM. Based on current knowledge of this species, it is expected that the juvenile dispersed in the fall season to an area outside of its mother's home range (Messick and Hornocker 1981). Males are generally solitary outside of the breeding season. It is assumed that juveniles would disperse to the less populated areas north, southeast and/or west of the

Cumming Ranch TM. This species is associated with those habitats and wildlife corridors and linkages to be preserved within open space."

Other faunal species of the grassland that have been observed, or are expected, would have a smaller territory or would be able to fly to suitable habitat. Therefore, these other species would be able to move more freely than badgers, which were specifically analyzed in the Final EIR. Also refer to Response to Comment J-9.

M-7

The comment regarding the project's potential traffic contribution and its effects on wildlife dispersal corridors and linkages is noted. SR 67 is an existing barrier to wildlife, and Caltrans has future plans to improve this route, including appropriate wildlife crossings. In addition, the applicant will be upgrading culverts in Highland Valley Road and adding appropriate wildlife directional fencing as design features of the project. The Final EIR discusses the project's effects to wildlife dispersal corridors and linkages in Section 3.1.3 under significance guideline #6; also see Response to Comment J-8 for more discussion of wildlife corridors. This evaluation found that impacts to wildlife movement would be less than significant because of project mitigation measures and design features.

M-8

The comment states that the location of habitat enhancement should be directed to Areas B and C. The restoration activities are mitigation for wetland impacts and the planting of 30 native oak trees. The wetland mitigation activities are planned within Area A in accordance with the Conceptual Revegetation Plan (Attachment D of the Draft EIR) over a total of 3.48 acres within the southeastern portion of the project site. The proposed Area A wetland mitigation site offers the best onsite wetland/riparian mitigation opportunity, as riparian functions in the proposed location are substantially degraded and no sensitive plant or animal species would be impacted by the restoration program. This location was also chosen because of its access to irrigation and because the existing hydrology will support the planned planting pallet and it will provide cover for wildlife where none exists now. Other locations were found to be functioning at a higher level and were comparatively more pristine even with agricultural disturbances; thus, these locations would not benefit as greatly from enhancement. Implementation of appropriate restoration measures would significantly increase the ecological wetland function of the site. As described in Response to Comment M-4, multiple design features have been incorporated into the project to reduce edge effects. The wetland impacts are subject to jurisdictional permitting and the location of the restoration will be finalized by the permitting authorities.

M-9
The comment proposing a reduction in the project footprint is noted. The Draft EIR included a complete evaluation of the potential edge effects that could result from project occupation. As described in Response to Comment M-4, multiple design features have been incorporated into the project to reduce edge effects. A significant impact due to residential edge effect was identified (Impact BI-17). Mitigation Measure (M-BI-17) is required and would reduce the potential impacts due to edge effects to less than significant. The habitat contained in the open space lots would be monitored and managed, as prescribed in the Resource Management Plan, to further minimize operational edge effects.

While the movement of lots, as recommended in the comment, may serve to further reduce biological edge effects, a substantial redesign of the lot layout may result in impacts to other resources areas. For example, the addition of lots lining Highland Valley Road would create a denser aesthetic environment impacting both visual and community character, additional noise impacts from the roadway, and other similar types of impacts. However, the relocation for Lot 109 has been evaluated to expand the wildlife corridor to the south and into lots I and G. As a result of this evaluation, the Tentative Map has been revised to relocate Lot 109 to south of Highland Valley Road adjacent to Open Space Lot C. The relocation of this lot further increases preservation of habitat within the PAMA and increases the connectivity between Open Space Lots I and J.

M-10
Closing statement noted. No response is necessary.

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Mr. Larry Hofreiter, DPLU Project Manager
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Larry.Hofreiter@sdcounty.ca.gov

December 20, 2010

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DEC 20 2010
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SUBJECT: Cummings Ranch Project Draft EIR

Dear Mr Hofreiter:

N-1 We appreciate the opportunity to comment on the Draft Environmental Impact Report on the Cumming Ranch Project ("Project"). The California Native Plant Society (CNPS) works to protect California's native plant heritage and preserve it for future generations. CNPS promotes sound plant science as the backbone of effective natural areas protection. We work closely with decision-makers, scientists, and local planners to advocate for well informed and environmentally friendly policies, regulations, and land management practices.

N-2 While we applaud the proponent's stated goal of preserving open space and understand the proponent's desire to build houses on the project site, the botanical data supporting this project are both out-of-date and probably incomplete. Therefore, we cannot support the proposed project or any development alternative without more data.

There are two specific problems. First, the botanical surveys for the project are out of date. The data were collected between 2000 and 2004, and they should have been conducted after 2005 to be relevant. Given that we had record rains in 2005 and a record drought in 2007, quite a lot could have changed since the area was surveyed.

In addition, the botanists surveyed for a small and idiosyncratic list of plants, and did not locate species previously found on the site. This is problematic, because it means that all construction, mitigation, and restoration decisions are based on flawed and incomplete data, as described below.

N-3 To check the botanical coverage, CNPS volunteers checked the CNPS inventory of rare and endangered plants (http://cnps.site.aplus.net/cgi-bin/inv/inventory.cgi) and performed a "nine quad" search around the project's location in the San Pasqual Quadrangle. This search turned up 14 species on CNPS Lists 1-3 that occur in Project's quadrangle, and an additional 50 species that occurred in the surrounding 8 quadrangles. (note: this analysis took one volunteer two hours. This is *easy* to do, and it should have been done by the consultant).

The project botanist surveyed for only **5 of the species in the Project's Quadrangle (35%), and only 7 species that occurred in the CNPS database (13%).** Additionally, the botanist surveyed for 2 species that did not occur in the area. While we agree that some of these species,

Letter N
SD Native Plant Society Responses

N-1
Comment N-1 provides an introduction to the California Native Plant Society. No comment on the analysis of the Draft EIR is included and no response is necessary.

N-2
New botanical resource surveys are not needed. Botanical surveys, as well as numerous wildlife surveys, were conducted over multiple years. Rainfall patterns also varied over those survey periods. The fact that, subsequent to those surveys, there were years of high and low rainfalls, does not represent a substantial change to the conditions. The site has been subject to multiple years of surveys, whereas many projects are approved based upon one survey season.

N-3
The comment is incorrect that the botanist's survey was for five sensitive species. At the end of the responses to Letter N, is a list of species that were targeted and their status of presence/absence. Additionally, the botanical surveys were conducted to accommodate multiple blooming periods; thus, if other species were on the site during these surveys, they would have been encountered. The table included below (adapted from Table 5 of the Biological Technical Report) provides detailed survey date information.

The following was presented on page 30 of the Biological Technical Report:

Sensitive plants include those listed by the USFWS and CDFG, candidates for listing (USFWS, CDFG), and/or are considered sensitive by the CDFG, the County of San Diego and/or the California Native Plant Society (CNPS) (Tibor 2001). Sensitive plant species surveys were conducted during the appropriate times of year throughout the spring, summer, and fall months between 2000 and 2004. Due to continuing drought conditions and a 2003 fire within Area A on the hilltop, some potentially occurring sensitive plant species may not have occurred in the numbers typically associated with average rainfall years.

Both southern tarplant (County Sensitive) and San Diego navarretia (federal threatened) were located on the Cumming Ranch TM. In addition, a comprehensive oak tree inventory was conducted to determine presence of coast live oaks (Quercus agrifolia), Engelmann oaks (Quercus engelmannii), and oak hybrids (coast live oak hybridized with scrub oak [Q. berberidifolia] and Engelmann oak hybridized with scrub oak). These data, along with photographs

of each tree, may be found within Appendix G. Sections 6.4.3.1, 6.4.3.2, and 6.4.3.3 and Figure 5 discuss these three sensitive species in greater detail.

Seven additional County sensitive plant species may have the potential to occur within or adjacent to the proposed residential subdivision or may have a low to moderate potential for occurrence on-site are discussed in Table 1 of Appendix H. These include Orcutt's brodiaea (Brodiaea orcuttii), San Diego goldenstar (Muilla clevelandii), little mousetail (Myosurus minimus ssp. apus), graceful tarplant (Holocarpha virgata elongata), Coulter's saltbush (Atriplex coulteri), Parish's brittlescale (Atriplex parishii), and vernal barley (Hordeum intercedens). Although focused surveys were conducted for these species over four field seasons (Table 10), they were not identified on-site. This may be due to many biotic and abiotic factors that can include drought, lack of seed base, inappropriate soils, pollution, heavy cattle grazing, and on-going agricultural practices.

Species	Survey Dates
Vernal Pool Botanical Survey	Conducted on 18 and 30 December 2002; 10 January 2003; 13 February 2003; and 20 March 2003.
Focused survey for Federal and State Listed and County Sensitive and Rare Plant Species	Conducted on 16, 21, and 23 May 2001; 25 through 30 August 2001; 20 March 2003; 1 April 2003; 17 February through 5 March, and 29 through 30 April 2004.

Many species were surveyed for but were not found based upon many reasons, as noted above.

such as the Encinitas baccharis (*Baccharis vanessae*) were very unlikely to occur on the project site, the fact remains that many of the species do occur in the area. We were very surprised that species such as the federally endangered San Diego button celery (*Eryngium aristulatum* var. *parishii*) were not on the survey list. It is a vernal pool species. We are also concerned that many of these ignored species occurred in chaparral and wetlands that will be heavily impacted by the project.

N-4

N-5

N-6 We were also concerned that the botanist did not find little mousetail (*Myosurus minimus* ssp. *apus*), which had been found previously on the project site, or Orcutt's brodiaea (*Brodiaea orcuttii*), which occurs across the street on the same habitats that occur on the project site.

N-7 Additionally, the botanist described a "*Quercus berberidifolia X Quercus agrifolia*" hybrid, which is biologically unlikely, as they belong to separate subgenera which are not known to hybridize. These mistakes suggest that the survey was incomplete.

N-8 Finally, we are concerned about the low mitigation ratio for chaparral. While we understand that the County's policy is to mitigate mixed chaparral at a 0.5:1 ratio, this will cause two problems:

N-9 1. Many of the sensitive species that the project botanist ignored occur in chaparral, and the species found on survey can all be identified at a distance. Thus, there is a reasonable probability that the project will result in the unmitigated take of sensitive species.

N-10 2. The species identified (oaks, redberry, toyon, sumacs, and poison oak) produce edible nuts and berries that are important wildlife food sources. The mixed chaparral has more of acorn and berry species than any other plant community found within the project, and the disproportionate loss of this plant community will sharply affect the project site's ability to support birds and mammals.

N-11 In sum, we strongly urge the County to perform an up-to-date, complete survey of the project, so that if development proceeds, the impacts are minimized. Additionally, we urge the County to

N-12 increase chaparral mitigation ratio to 1:1, so that the animals can retain their food sources.

N-13 Given the current outdated, inadequate information, we cannot support any development on the Cumming Ranch project.

Thank you for consideration of our comments.

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Sincerely,

Carrie Schneider, Conservation Chair CNPS-San Diego

N-4
The comment is incorrect that the botanist's survey was for five sensitive species. Please see Response to Comment N-3 above regarding appropriate surveys for sensitive species. San Diego button-celery was a species included in the focused vernal pool survey. It is listed as one of the vernal pool indicator species on page 13 of the Ramona Vernal Pool Preserve 2004 Botanical and Fairy Shrimp Survey Results Report (Appendix B of the BTR). There is no direct or indirect impact to vernal pool habitat and no impact to San Diego button-celery.

N-5
The comment is incorrect that the botanist's survey was for five sensitive species. Please see Response to Comment N-3 above regarding appropriate surveys for sensitive species.

N-6
Table 10 of the BTR notes that focused surveys were conducted for little mousetail. The table provides survey details and indicates that little mousetail was not present. The BTR also notes that little mousetail was previously identified in the eastern vernal pool section of Area C in 1996. The previous report did not state which pool it was located within. Additionally, since no impacts would occur to vernal pool habitat, there is no potential impact to little mousetail if it were to occur onsite.

Table 10 also notes the survey dates and results for the focused surveys for Orcutt's brodiaea. The table provides survey details and indicates that Orcutt's brodiaea was not present. The previous records for Orcutt's brodiaea have been recanted from the Oak Country Estates site because the species found were the more common, *Brodiaea joliensis*.

N-7
The comment is incorrect in the interpretation of the biology report and the discussion of the survey regarding the hybrid oaks and their identification. The biologist did not describe "Q. berberidifolia X Q. agrifolia" (scrub oak X coast live oak). The report indicates that 41 oak tree hybrids were noted and generally mentions the three possible parents (coast live oak, Englemann oak, and/or scrub oak). It is noted that generally coast live oaks will hybridize with Engelmann oaks and Engelmann oaks will hybridize with scrub oaks. Other specifics of this comment are not relevant.

N-8
As listed in Table 3.1-5 of the EIR, the required mitigation ratio for both Granitic southern mixed chaparral and Granitic chamise chaparral is 0.5:1. Mitigation

ratios have been established by the County based upon the geographic extent of that vegetation community, its value to support wildlife species, and its value to sensitive species. These ratios have been subject to peer review and public scrutiny through public review of the Guidelines for Determining Significance, through the processing of numerous private projects and through the MSCP planning effort in San Diego County. The project will impact a total of 23.4 acres of these habitats, which results in a mitigation requirement of 11.7 acres. However, the project will actually provide a total of 17.5 acres of this habitat onsite as mitigation, which exceeds the 0.5:1 ratio by about 50 percent.

N-9
Sensitive plant species of the chaparral habitat were not ignored in the survey, impact analysis, or mitigation, which were all based on County Report Content and Format Requirements. The site has about 42 acres of chaparral and about half of that will be impacted. This is a small amount compared to the 233 acres of the project footprint. No sensitive plant species were found in the chaparral. Therefore, the standard County mitigation ratio of 0.5:1 for chaparral for the subject property is appropriate.

N-10
The chaparral's value to specific wildlife species is recognized. Other specific wildlife species live in and use other habitats (e.g., grassland and scrub habitats). Still other wildlife species are generalists and they live in and use many habitat types. Mitigation ratios, as noted in Response to Comment N-8 above, were established based upon the rarity and ecological value of that community. County mitigation ratios are appropriate for this project and countywide.

N-11
The comment is incorrect that the botanist's survey was for five sensitive species. The general survey was reviewed and verified by AECOM in 2010 and it remains adequate. Please see Response to Comment N-3 above regarding appropriate surveys for sensitive species.

N-12
Mitigation ratios are appropriate and consistent with the County's requirements for preparing biological survey reports.

N-13
This comment states that the organization does not support the development due to inadequate information. No comment on the Draft EIR is provided and no response is necessary.

List Referenced in Response to Comment N-3

Table 1. Potential for Occurrence of Sensitive Botanical Species at the Proposed 682.60-Acre Cumming Ranch TM

SPECIES	SENSITIVITY STATUS	PREFERRED HABITAT	OBSERVED ONSITE	POTENTIAL FOR OCCURRENCE
San Diego Thorn Mint *Acantho-Mintha Ilicifolia*	Federal Threatened State Endangered CNPS List 1B	Gabbro Soils (vernal pools, clay soils, etc.)	NO	None – due to lack of appropriate gabbro soils to support this species. Not detected during focused rare plant surveys.
Orcutt's Brodiaea Brodiaea Orcuttii	CNPS List 1B County Sensitive	Clay Soils in Vernal Swales or Pools.	NO	Low to Moderate – In Area A and Area B due appropriate soils and vernal swales/pools known to support this species. Not detected during rare plant surveys.
Spreading Navarretia *Navarretia fossalis*	Federally Threatened CNPS List 1B County Sensitive	Clay Soils in Vernal Swales or Pools.	YES	Observed - Numerous plants identified within the large vernal pool located in Area C. Not detected during rare plant surveys in other areas.
Caraway Leaved Gilia *Gilia Caruifolia*	CNPS List 4 County Sensitive	Montane Coniferous Forest and Chaparral	NO	None – due to lack of montane coniferous vegetation or chaparral and elevation/soil restrictions. (This species should be removed from this list for Ramona) Not detected during rare plant surveys.
San Diego Goldenstar (Cleveland's Goldenstar)	CNPS List 1B County Sensitive	Open Clay Soils, vernal pools, grasslands,	NO	Low to Moderate – Possible in Area A and Area B due appropriate soils

SPECIES	SENSITIVITY STATUS	PREFERRED HABITAT	OBSERVED ONSITE	POTENTIAL FOR OCCURRENCE
Muilla clevelandii		sage scrub, and burned areas below 1,500 feet		and vernal swales/pools. Not detected during rare plant surveys.
Little Mousetail *Myosurus minimus* ssp. *apus*	CNPS List 3 County Sensitive	Clay Soils in Vernal Swales or Pools.	NO	Moderate to High – There are unconfirmed reports that this plant species was identified within at least one of the vernal pools located in Area C. Not detected during rare plant surveys.
Palmer's Grappling Hook *Harpagonella Palmeri*	CNPS List 2 County Sensitive	Open Clay Soils and Burns below 1000 feet	NO	None – due to lack of appropriate gabbro soils and elevation restrictions. (This species should be removed from this list for Ramona) Not detected during rare plant surveys.
Southern Tarplant *Centromedia Parryi Australis*	CNPS List 1B County Sensitive	Vernally Mesic Soils in Valley Foothill Grasslands and in Vernal Swales or Pools	YES	Observed - Several Populations identified within Areas A, B, and C.
Graceful Tarplant *Holocarpha Virgata Elongata*	CNPS List 4 County Sensitive	Cismontane Woodland, Coastal Sage Scrub, Valley Foothill Grasslands	NO	Low – due to previous and current disturbance within the active agricultural areas. Not detected during rare plant surveys.
Parish's Brittlescale *Atriplex parishii*	CNPS List 1B County Sensitive	Chenopod scrub, playas, vernal pools, cismontane alkali wetlands.	NO	Low –not detected during rare plant surveys.

SPECIES	SENSITIVITY STATUS	PREFERRED HABITAT	OBSERVED ONSITE	POTENTIAL FOR OCCURRENCE
Engelmann Oak Quercus engelmannii	CNPS List 4 County Sensitive	Mixed oak woodlands, and shrublands and grasslands which occur as an understory.	YES	Observed - 30-Engelmann oak individuals have been detected, numbered and mapped within the Cumming Ranch SPA Area A.
Lakeside Ceanothus *Ceanothus cyaneus*	CNPS List 1B County Sensitive	Granitic mixed chaparral	NO	None – would have been detected during focused rare plant surveys if present.
Vernal Barley *Hordeum Intercedens*	CNPS List 3 County Sensitive	Saline Flats, Depressions in Valley Foothill Grassland or Vernal Pools	NO	Low to Moderate – due to appropriate soils, cismontane alkali wetlands, and vernal pools known to support this species. Not detected during rare plant surveys.

San Diego County Archaeological Society, Inc.
Environmental Review Committee

13 November 2010

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NOV 16 2010
DPLU - PPCC

To: Mr. Larry Hofreiter
Department of Planning and Land Use
County of San Diego
5201 Ruffin Road, Suite B
San Diego, California 92123-1666

Subject: Draft Environmental Impact Report
Cumming Ranch Project
GPA 03-007, SP 03-005, TM 5344, STP 10-007, REZ 07-002, Log No. 03-09-028

Dear Mr. Hofreiter:

O-1 I have reviewed the cultural resources aspects of the subject DEIR on behalf of this committee of the San Diego County Archaeological Society.

Based on the information contained in the DEIR and its cultural resources report, we have the following comments:

O-2 1. Mitigation Measure M-CR-2 and, by reference, Mitigation Measures M-CR-3 and M-CR-5 call for a Resource Management Plan that incorporates annual visits by a qualified archaeologist and a Native American monitor. Page 64 of the cultural resources report lays out the elements of the plan but appears ambiguous about who is to fund the annual inspections, presumably in perpetuity. It is also unclear who would be responsible for funding any corrective actions recommended. Given the normal funding situation, it does not appear reasonable to expect that County Parks would be able to provide the necessary funds.

O-3 2. Site SDI-17192 is said, in both the DEIR's Section 3.2 and the cultural resources report, to not be significant "due to its recent age." However, the cited period of 1930-1950s is largely more than 45 years old. The significance determination needs to be made on the basis of the site's research potential, not its age.

O-4 3. A number of sites evaluated as not significant incorporate bedrock milling features. While we do not disagree with the significance determination and the conclusion that no mitigation measures are required for those sites, we suggest that the purchasers of the lots on which the milling features exist be advised of their presence and be encouraged to retain them if possible. Some potential owners may find the presence of the milling a welcome element of the lot.

P.O. Box 81106 • San Diego, CA 92138-1106 • (858) 538-0935

Letter O
San Diego County Archaeological Society

O-1
Introductory comments noted. No response is necessary.

O-2
The County provided the Conceptual Resource Management Plan (RMP) on-line and at the County offices and library during the public review period for the Draft EIR. The RMP is contained in Appendix C of Volume I of the Environmental Impact Report Appendices (page 407). Prior to the approval of the Final Map, the RMP will be finalized and funding will be established. The conceptual plan envisions that a Resource Manager, approved by Department of Parks and Recreation (DPR), will assume operational and maintenance responsibility of these areas. The RMP will be funded through a County Landscape Maintenance District (LMD), which will assess the 125 residential lots in the Cumming Ranch project and annually collect the assessment fee. The management fee will be generated following the process set forth in the LMD. At the time of the development of the LMD, a Memorandum of Understanding (MOU) will be prepared with DPR that identifies the threshold for the number of units to be sold under the LMD to generate enough funding for DPR to assume management of the area. The per-acre cost estimate for management will be developed by DPR. The LMD will be effective and implemented upon issuance of the final map for the proposed project. The Resource Manager positions would be retained by the County DPR under provisions of the LMD. The Resource Manager's primary responsibility will be to maintain the integrity of the preserved habitats and cultural resources, as described in the finalized RMP.

O-3
The County agrees with this comment. Section 3.2 of the Draft EIR and the cultural resource report will remove the statement that "the site is not significant because of its recent age." The cultural report prepared by Timothy Gross of Affinis, Inc. identifies site 17,192 as a small trash deposit composed of mostly glass and miscellaneous metal artifacts. Page 35 of the cultural report states that the deposit was tested and evaluated for significance and found to be not significant. The following information will be added to Section 3.2 of the EIR and page 48 of the cultural report: The site is not considered significant because it is a relatively shallow deposit and it lacks diagnostic items such as toiletries and clothing remains that would be expected from a significant household site. As a result, all of the information that can be obtained from the site has been thoroughly captured through the archival research, testing, and recordation of the site, and the impacts to the site are thus less than significant.

O-4

The County agrees with this comment. Page 82 (Goal B.2) of the RMP states that natural landforms will be preserved as much as possible. The County cannot mandate that the bedrock milling features be preserved since they were found to be not significant; however, as described throughout Chapter 1.0 of the Draft EIR, the residential portion of the project has been designed to avoid removal or destruction of the natural features of the project site and the major rock outcroppings have been protected by placement in proposed open space lots.

The lots with significant sites containing bedrock milling features (BMFs) have been preserved within open space lots. The others were evaluated as "not-important" after site recordation, testing, and mapping. Not all of the not-important BMFs could be preserved; however, some are preserved as visual features within building restricted areas. Although the project has been designed to minimize grading, eight BMFs evaluated as not-important will be within the project envelope, and some will be impacted by the project infrastructure. The County is in agreement with the commenter and has strongly recommended that the developer advise new property owners to incorporate the BMFs within their landscape plans. However, the BMFs have been researched and evaluated and the County cannot require their preservation.

O-5 4. Other than comments 1 and 2, above, we agree with the impact analysis and mitigation measures incorporated in the DEIR.

O-6 Thank you for including SDCAS in the public review of this project's environmental documents.

Sincerely,

James W. Royle, Jr., Chairperson
Environmental Review Committee

cc: Affinis
SDCAS President
File

P.O. Box 81106 • San Diego, CA 92138-1106 • (858) 538-0935

O-5
The County acknowledges the SDCAS's agreement with the impact analysis and mitigation measures.

O-6
Closing statements noted. No response is necessary.

San Diego Mountain Biking Association

December 20, 2010

Larry Hofreiter, DPLU Project Manager
Maggie Loy, Environmental Manager
Jarrett Ramaiya (jarrett.ramaiya@sdcounty.ca.gov)

To Whom It May Concern:

Thank you for considering our comments regarding the Cumming Ranch Project Draft Environmental Impact Report (D-EIR).

First, we are happy that the Cumming Ranch Development EIR includes plans to provide pathways and trails for non-motorized users and support the inclusion of the plans for 3.4 miles of community trails and pathways. We also support the consideration given to connecting the trails associated with the Cumming Ranch development with the trail network in and around Ramona Grasslands. P-1

We are concerned, however, about two areas of the D-EIR and supporting documents.

First, on page 1-8 of the D-EIR (08080045 Cumming Ranch EIR_Public Review Draft.doc (10/26/10)), the document states that "[t]rail tread widths would range from 8 to 10 feet". Trails of this extreme width are inconsistent with the preserve nature of the open space, and detract from the experience of some users. Some of us vastly prefer narrower trails for several reasons. Many of us agree that narrower trails provide a heightened impression of being within nature. In our point of view, wide trails bear a distressing similarity to freeways, not an experience we are seeking in open space areas. We also think that such trails are inconsistent with some the stated goals of the Recreation Element (CRSP/GPAR, p. 3-20) - i.e., that of blending trails into the natural environment. In addition, properly designed, meandering trail systems can reduce user-group conflicts. P-2 P-3 P-4

Second, we appreciate that the D-EIR generally approaches non-motorized uses of the trails as including three user groups: hikers/runners, equestrians, and bicyclists. However, in one of the supporting documents, the "Cumming Ranch Specific Plan / General Plan Amendment Report P-5

San Diego
Mountain Biking
Association
PO Box 881491
San Diego, CA 92168-1491

AN AFFILIATE OF IMBA INTERNATIONAL MOUNTAIN BICYCLING ASSOCIATION

Letter P
San Diego Mountain Biking Association

P-1
The introductory statements and organization's general approval of the non-motorized trail system included in the Cumming Ranch project is noted. No response is necessary.

P-2
The County acknowledges that there are varying opinions regarding preferred trail width, dependent upon type of trail user, desired experience, and personal preference. As described in Section 1.2.2 of the Draft EIR, design of the trail system has included extensive input from the Transportation and Trails Subcommittee of the Ramona Community Planning Group, the Ramona Trails Association, and the County Department of Parks and Recreation. The routing and design of the trail and pathway system follow the planning guidelines of the Ramona Community Trails and Pathway Plan, which is part of San Diego County Trails Program Community Trails Master Plan. The trail width of 8–10 feet as described in the Draft EIR has been designed in accordance with guidelines in the appropriate planning documents.

P-3
The trail system has been designed to be consistent with applicable planning documents such as the County General Plan Conservation and Open Space Element, the Ramona Community Plan, and the San Diego County Trails Program Community Trails Master Plan. As noted in Response to Comment P-2 above, there has been substantial coordination with trail groups and County Parks and Recreation to plan the trail alignments appropriate to provide an enjoyable trail experience that is synchronized with the natural surroundings. Additional design elements, such as a soft natural surface rather than paving, alignments that follow the natural contours of the land, and use of natural features such as landscaping or rocks rather than fencing to block potential off-trail use, would help the trails to blend into the natural environment.

P-4
Trail design has incorporated many alignment considerations including reducing environmental impacts, avoiding sensitive habitat areas, user experience, and connectivity to other local and regional trail systems (existing or planned). As noted in the comment, appropriate design of trails can reduce user group conflicts and, because of the careful design of the trails and pathways on the project site, user group conflicts are not anticipated.

P-5

It is not the intent of any of the Cumming Ranch project planning documents to exclude bicyclists from the category of non-motorized trail users. As noted in the comment, the Draft EIR does include bicyclists as part of the non-motorized users anticipated to use the trail system. Any omission of bicyclists in other project planning documents is an oversight and does not mean bicyclists are excluded.

San Diego Mountain Biking Association

P-5 cont

"(Public Review Draft 11/4/10)," users of the proposed trail systems as are frequently classified as either pedestrians and equestrians, ignoring bicyclists. See, for example, the bottom of page 2-7, page 3-9, page 4-23, and Figure 4-4. Our understanding is the Draft EIR is the controlling document, so please correct the supporting documents to conform with the D-EIR. It is my understanding the Ramona Trails Association also supports access by all non-motorized users groups.

P-6

We definitely support allowing access by bicyclists to the trails of the Cumming Ranch project, as well as the pathways, and look forward to riding on them.

Yours truly,

/Russell Boggs/

San Diego
Mountain Biking
Association
PO Box 881491
San Diego, CA 92168-1491

AN AFFILIATE OF IMBA INTERNATIONAL MOUNTAIN BICYCLING ASSOCIATION

P-6
Closing statement and commenter's support of bicycle use on the project trail are noted. No response is needed.

From: dbittnerwri@gmail.com [mailto:dbittnerwri@gmail.com] **On Behalf Of** Dave Bittner
Sent: Thursday, December 02, 2010 3:34 PM
To: Hofreiter, Larry
Cc: Pagel, Joel; Lincer, Jeff; Chris Meador; renee rivard; Bittner, Leigh; bschlotf; Mayer, David; Heather Bieler
Subject: Cummings Ranch Proposed development project, Ramona, CA

Dear Larry,

Q-1 I wish to address the fact that there is no report on the Golden Eagles that use the ranch. There is a mention of the Golden Eagles as having been seen but no mention of the US Fish and Wildlife Interium Guidlines for Golden Eagles and the need to address this species seperately. Since there is a Golden Eagle nesting pair within eyesight of the project and the pair utalizes the ranch as an important part of their foraging I believe further study is needed.

I believe that a full report of impact and possible take is needed for this proposal. I have contacted both Joel Pagel, Carlsbad office, and Heather Bieler,Sacramento office of the US Fish and Wildlife Service and both dealing with permitting for Golden Eagles.

Q-2 Since the area has been designated for potential preservation within the North County MSCP and over $40,000,000 has already been spent to preserve the Ramona Grasslands area we need to consider carefully the impact this developement will have on wildlife we are trying to preserve. Any approval without this consideration would be counter to all the efforts of many agencies, and NGOs over the past 15 years.

Q-3 The potential take of a breeding pair of Golden Eagles is direct conflict with the new guidlines pertaining to the Bald and Golden Eagle Act, that all new developements must take into consideration and the US Fish and Wildlife has to issue a permit to comply. The exact guidlines need to be obtained from the US F&WS since they have that responsibility

Dave Bittner
Executive Director
Wildlife Research Institute, Inc
760-789-3992
www.wildlife-research.org

Letter Q
Wildlife Research Institute Responses

Q-1
The Draft EIR or biological technical documents did not include specific studies or surveys for the golden eagle. As noted in the comment, new regulation regarding golden eagles has been issued by U.S. Fish and Wildlife Service (USFWS) since publication of the Draft EIR. The EIR noted potential for golden eagles to forage within the project site and surrounding grasslands. As recommended by USFWS, a new study was completed that included a golden eagle survey and habitat assessment to determine potential project-related impacts. The study found that the proposed Cumming Ranch project would have less than significant impacts on foraging habitat. See Response to Comment A-8 for additional details.

Q-2
The County acknowledges planning and conservation efforts within the draft North County MSCP. However, as part of the Ramona Community Plan, the Cumming Ranch SPA has been planned for development for many years. The County has been active in the effort to preserve the Ramona grasslands and has participated in the formation of the Ramona Grasslands Preserve. The Ramona Grasslands Preserve is discussed in detail under Project Background Information in Section 1.1.2 of the Draft EIR and the Cumming Ranch project would designate a total of 457.4 acres as open space for inclusion in the Ramona Grasslands Preserve. Section 3.1 of the Draft EIR provides detailed analysis regarding wildlife species on the project site and within the surrounding grasslands, and found that potential impacts would be less than significant with appropriate mitigation. County decision makers will consider potential impacts to the grasslands and wildlife species as identified in the Final EIR prior to approval of the project.

Q-3
The comment describes requirements of the new Bald and Golden Eagle Act, including take permits. As detailed in Response to Comment A-8 and above in Response to Comment Q-1, the County and project applicant are coordinating with USFWS to ensure that all requirements of the new golden eagle guidelines are met.

From: Susie Amundson [mailto:susie_pyro@yahoo.com]
Sent: Thursday, December 02, 2010 11:48 AM
To: Hofreiter, Larry
Subject: Cumming Ranch project

R-1 Good Morning, Larry. I was just reading through the county Dept. of Planning & Land Use notice regarding the new housing development on the former Cumming Ranch.

R-2 I am a local birder and actually walk and bird that area frequently. And, yes, we have CA gnatcatchers there, in abundance. I am more concerned about the burrowing owls that I enjoy watching on that property. These are in great decline in California. When threatened, they hide in their burrows and make a sound similar to a rattlesnake. When excavation begins, this behavior is exactly what the owls will do, and they will be plowed under and killed in their burrows.

R-3

R-4 Please tell me what the county plans to do to relocate the owls. I think there should be some space for them on the Ramona Grasslands Preserve. I kinda assume they migrated from there originally, but I do not know that for a fact.

Sincerely yours,
Susan Amundson
Ramona, CA

Susan Amundson

R-1
Comment R-1 is an introduction to the comment letter. No response is necessary.

R-2
Comment R-2 introduces the commenter as a local birder that watches California gnatcatchers and burrowing owls in "that area." No location- or date-specific information was provided. As detailed in Response A-9, professional biological protocol surveys (2001, 2004, 2010) for the project indicate that California gnatcatchers are not present onsite. Furthermore burrowing owls were not observed onsite during the many biological surveys from 2001 to 2010. However, because potential habitat is present onsite, impacts are considered significant (Impact BI-15) and the Project EIR requires pre-grading surveys and mitigation specific to these species to minimize potential impacts (Mitigation Measure M-BI-15d). By requiring pre-grading surveys and appropriate restrictions, this mitigation measure would ensure that construction activities would not harm gnatcatchers or burrowing owls if found to be present in or near the construction area.

R-3
As noted in Section 3.1 of the Draft EIR, all field surveys included burrowing owl, but no burrowing owls were observed onsite (2000 to 2004, 2006, and 2010). However, suitable habitat for the burrowing owl is present; thus, potential impacts to burrowing owl are considered significant (Impact BI-15). The EIR requires pre-grading surveys and mitigation specific to the species to minimize potential impacts. Mitigation Measure M-BI-15c states:

To avoid impacts specific to burrowing owls, which use their burrows year-round, the following measure shall be implemented and all grading permits, improvement plans, and the final map shall include the following notice:"Restrict all brushing, clearing, and/or grading such that: (1) from February 1 to July 31, no grading or clearing will be allowed within 300 feet of an occupied burrow; and (2) from August 1 to January 31 (or after young owls have fledged) no grading or clearing will be allowed within 300 feet of an occupied burrow until CDFG is consulted and passive nest exclusion has occurred. This measure may be waived if pre-grading surveys show that no burrowing owls are present."

By requiring pre-grading surveys and appropriate restrictions, this mitigation measure would ensure that construction activities would not harm burrowing owls if found to be present in or near the construction area.

R-4

Because burrowing owls were not found to be present on the site, no relocation plans are necessary at this time. However, as noted above in Response to Comment R-3, if the species were found onsite during pre-grading surveys, appropriate measures will be implemented, such as restrict all brushing, clearing, and/or grading such that (1) from February 1 to July 31, no grading or clearing will be allowed within 800 feet of an occupied burrow; and (2) from July 31 (or after young owls have fledged) no grading or clearing will be allowed within 800 feet of an occupied burrow until CDFG is consulted and passive nest exclusion has occurred. Coordination with California Department of Fish and Game would be required if the species were found to be onsite near construction areas during pre-grading surveys.

From: Susie Amundson [mailto:susie_pyro@yahoo.com]
Sent: Thursday, December 02, 2010 12:14 PM
To: Hofreiter, Larry
Subject: Re: Cumming Ranch project

Larry,

Thanks for the prompt reply.

R-5 I believe the additional houses will be beneficial to our community. I'm a realtor. I'm also a nature lover, and I believe it's possible to balance the uniqueness of this area with additional development. That's why I don't want to lose the owls in the process.

Susan

R-5
The commenter's opinion is acknowledged and is included in the project's Final EIR for the decision makers to consider. No additional response is necessary.

Jerry & Edee Bell
17229 Voorhes Lane
Ramona, CA 92065

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December 16, 2010

Mr. Larry Hofreiter
County of San Diego - Department of Planning and Land Use
5201 Ruffin Road, Ste B
San Diego, CA 92123

Subject: Comments on the Proposed Cumming Ranch Project
GPA 03-007; SP 03-005; TM 5344; REZ 07-002, LOG NO. 03-09-028; SCH NO. 2004031136

Dear Mr. Hofreiter:

In review of the DEIR for the Cumming Ranch Project my wife and I have the following comments. Specifically:

S-1 1. As far as the **rural community character** of the West End, we feel that anyone that hasn't lived in Ramona for at least 30 years has no business complaining about the rural community character of Ramona being affected. The complainers can pick up everything they own, scrape their house off the land and move the heck out and let their property revert back to the pristine area it once was if they feel so strongly about preserving rural character. We feel someone that doesn't want development must be some kind of sanctimonious selfish "I was here first and you can't be here" type of person to plop yourself down and then say "Nobody else unless you do it **MY WAY**" to the rest of the people.

S-2 2. **Degradation of transportation corridor**: OK, you Mr. Larry Hofreiter have a Grade F by the county for Highway 67 (Slaughter Alley). And you now have before you a proposal to add considerable traffic without making the roads safer? You are aware of the facts of increasing traffic on 67 so you should also take responsibility for the consequences if road improvements are not also made to accommodate more traffic. This is not an "I didn't know" scenario, this is a "Yes, we will bring the road up to a passing grade", or "No, it's OK I add to the problem and cause more people to die".

S-3 3. **Loss of biological resources**. The raptors will move on to other areas. More raptors are killed by those infernal electric generating wind machines placed on land than die of starvation due to houses being built.

S-4 4. **Growth inducement & habitat/waterway degradation**. The RMWD already has had sewage spills into the Etcheverry and Santa Maria drainage systems, and thru a well-known major floodplain. Anybody lose their job over it? Are the RMWD (and you) going to give me money to buy equipment to treat my well water with pollutants the RMWD illegally releases? That the development releases? Lake Hodges is so contaminated now the water sucked out of it needs extensive treatment. There is also however the question of water availability. Ramona water is some of the most

S-5 expensive around and according to RMWD is in short supply. Are the people of Ramona going to be fined because the RMWD (and you) allow even more customers onto a limited resource?

S-6 5. From an **aesthetics** point of view, Poway once claimed (maybe still do) that they were the "City in the Country", cop cars once proclaimed "To Protect and Serve" and Ramona wants to be rural. Well, Poway is just another citified mess; Ramona's cop cars are now fenced in with barbed wire to protect them, and Ramona is staying rural by having substandard water and sewer systems. Not a good track record on how local development has been handled.

S-7 6. Bottom line, a developer should be sensitive to the surrounding neighbors and environment, adding to the quality and not subtracting from the community. The entities supporting the infrastructures should be responsible in their decisions to ensure that their delivery to the community doesn't degrade into a less than satisfactory product. The County should be responsible enough to make sure that the people they serve can in fact enjoy Life, Liberty and the pursuit of happiness.

Sincerely,

Jerry & Edee Bell

Letter S
Jerry and Edee Bell

S-1
The commenter's opinion is acknowledged and is included in the project's Final EIR for the decision makers to consider. No additional response is necessary.

S-2
This comment indicates that the traffic on SR 67 should be made safer before adding the project's traffic volume to the roadway. Neither Caltrans, nor Poway, has a funded program in place for adding additional lanes to SR 67 in this segment. If there were a program, the project would pay a fair share into the program, but the project would not be required to construct the additional lanes because a mitigation measure must be roughly proportional to the project's impact. See CEQA Guidelines, Section 15126.4(a)(4)(B). The project would contribute approximately 4% of the traffic along this roadway segment. Because CEQA requires that mitigation be roughly proportional to impact or traffic that the project would contribute, a mitigation measure requiring the project to construct the full SR 67 roadway improvements would not be proportional to the project's impact.

The existing roadway deficiencies are the result of existing developed land uses and the responsibility of government agencies. In fact, Caltrans has developed improvement plans for SR 67 but does not have plans to fund improvements for 20 years. Caltrans has prepared an Engineering Overview (attached to these Response to Comments), which identifies completed, near-term, and long-range SR 67 improvements as part of their ongoing Ramona Community Outreach effort.

In evaluation of the impacts, mitigation has been developed that directly improves two impacted SR-67 intersections, at Archie Moore Road and at Highland Valley/Dye Road. Perceived safety is related to capacity and traffic flow. However, when facilities have deficient level of service (LOS), drivers typically are more attentive and they expect delays and congestion.

The capacity of SR 67 is generally determined by the capacity of its individual signalized intersections. The LOS for a section of SR 67 is defined by the average overall travel speed for the section. The project mitigation for the SR 67/Highland Valley Road/Dye Road intersection will reduce the degree of congestion and result in increased travel speeds, lower average travel times, and less spill-backs into upstream intersections. TIF improvements along the impacted section of Dye Road will also provide readily perceivable traffic improvements along Dye Road due to better flow through the intersection with SR 67 and improved movement along the roadway segment.

The project mitigation to install traffic signals at the intersection of Archie Moore Road and SR 67, when warrants are met, will result in the orderly movement of traffic, reduction in the frequency of certain types of accidents (i.e., right-angle and pedestrian), increased traffic capacity through the intersection, safe management of heavy traffic entering and crossing the intersection, nearly continuous movement of traffic at a desired speed along the route by coordination/sequencing, and driver confidence by assigning right-of-way. The mitigation will reduce impacts at these two intersections from an unacceptable LOS E to an acceptable LOS C according to County standards, but, in addition, will improve traffic flow on SR 67 segments and traffic safety will be incrementally improved. The project will have done its part to mitigate direct traffic impacts on SR 67 due to deficient LOS.

The project's SR 67 improvements will improve highway traffic operations and minimize the likelihood of peak-hour traffic using alternative, but more circuitous routes like Archie Moore Road in an attempt to bypass congestion along SR 67. The improved intersection operations will result in better traffic flow along the highway corridor and make alternative routes a less attractive option during peak traffic periods. The project's SR 67 intersection improvements will benefit the parents and students at the Mt. Woodson Elementary school by minimizing diverted traffic and improving intersection operations for all vehicles traveling to/from the school to/from SR 67.

The Transportation Impact Fee (TIF) program adopted by the County for the Ramona area provides a means to mitigate indirect, cumulative traffic impacts through the payment of fees for the project's fair share of impact. The TIF program includes the impacted segments of SR 67 as a planned improvement that would be funded by developments with cumulative impacts to the roadway segment. Planned TIF local transportation facilities (collectors and minor streets) and regional facilities (state routes, prime arterials, and major roads) will benefit both the Ramona community and surrounding areas by creating better operating conditions and allow traffic to flow without substantial delays. These improvements will also reduce potential cumulative safety increases on SR 67 due to unacceptable LOS.

In addition, during construction, this project and all projects are required to apply for a County of San Diego Traffic Control Permit (TCP) for construction work within or near County right-of-ways where traffic operations may be affected. A County construction and/or encroachment permit may also be required. The TCP will likely include a Traffic Control Plan with traffic measures and details that will be implemented to ensure that traffic operations on public roads (including motorists, pedestrians, and bicyclists) during construction are adequately addressed, and may exceed measures found in standard government manuals for traffic control. Compliance with mitigation measures and with County regulations will improve traffic operating conditions along the roadway by

reducing queue times at the signal and providing more appropriate turn lanes. These improvements would allow the intersection and roadway segments to operate better than current conditions and with less than significant traffic impacts.

S-3
This comment is unclear and does not address the adequacy of the Project EIR. Discussion of potential impacts to raptors is provided in the Biological Technical Report and EIR, Section 3.1. The commenter's opinion is acknowledged and is included in the project's Final EIR for the decision makers to consider. No additional response is necessary.

S-4
The commenter's opinion is acknowledged and is included in the project's Final EIR for the decision makers to consider. The following responds to the content of the comment related to sewer lines that are in or adjacent to the grasslands and drainages and the potential for drinking water effects if there are sewage spills. Cumming Ranch is defined under the County of San Diego (County) Watershed Protection, Stormwater Management and Discharge Control Ordinance as a "Priority Development Project," which is subject to the County of San Diego Standard Urban Stormwater Mitigation Plan (SUSMP) Requirements. Storm water treatment for the project requires Low Impact Development (LID) standards to be implemented. The project's LID design will ensure onsite treatment through dispersal of runoff to landscaped areas, filters, settling ponds, pervious pavements, bioretention facilities, flow-through planters, dry wells, infiltration basins, constructed wetlands, and/or cisterns. Where feasible and where allowed, water in cisterns may be directed to non-potable uses, augmenting water supplies. Runoff peak-and-duration-control (hydromodification management) will also be employed to simulate pre-project and post-project runoff, and mimic pre-construction conditions with the effect of LID facilities, detention basins, or other storm water management facilities.

Grading and Improvement Plans will require that sewer mains be constructed using the latest technology and materials. The sewer line watercourse crossing will be engineered to a sufficient depth to mitigate for potential degradation and scour by flood flows. The sewer alignment avoids floodway zones where feasible and makes only one crossing of Etcheverry Creek and no crossings of Santa Maria Creek. Therefore, there is no perceptible increase in risk for septic contamination.

S-5
Section 3.6.1 of the Project EIR provides a description of the existing RMWD water supply system and availability as well as RMWD planning improvements to their facilities. Analysis of the Cumming Ranch project impacts to the water system and availability is provided in Section 3.6.3 of the Project EIR. As

required by Mitigation Measure M-PS-2 in the Project EIR, the County would not approve the Final Map for the Cumming Ranch project until after RMWD has provided a commitment of water supply to serve the project and the project developer shall be required to pay all service fees as determined by RMWD.

S-6
The commenter's opinion is acknowledged and is included in the project's Final EIR for the decision makers to consider. No additional response is necessary.

S-7
This comment does not raise a specific issue regarding the adequacy of the Project EIR. No further response is required.

Michael B Berthiaume
17289 Voorhes Lane
Ramona, CA 92065

December 16, 2010

Mr. Larry Hofreiter
County of San Diego
Department of Planning and Land Use
5201 Ruffin Road, Ste B
San Diego, CA 92123

Subject: Comments on the Proposed Cumming Ranch Project
GPA 03-007; SP 03-005; TM 5344; REZ 07-002, LOG NO. 03-09-028; SCH NO. 2004031136

Dear Mr. Hofreiter:

T-1 In review of the DEIR for the Cumming Ranch Project I have significant concerns regarding the impact such a proposal could have on the community of Ramona. Specifically:

T-2 1. The proposed project is not in keeping with the **rural community character** of the West End. Parcels in the adjacent and nearby surrounding areas are agricultural in nature with large animal-keeping, ranching, and dry-land farming. Parcels directly adjacent the project south of HV Road average 3.5 acres, parcels to the northwest of Area A average 10.7 acres, and the proposed 2020 General increases the minimum lot size to 10 acres north of HV Road. The Cumming Ranch Project proposal of an average lot size of 1.6 acre (suburban-like parcels), most devoid of large animal-keeping, is in stark contrast to the surrounding rural area and is inappropriate.

T-3 2. **Degradation of transportation corridor**: Hwy 67, from Poway Road to Archie Moore and Highland Valley Road is already deemed Grade F (worst grade possible) by the county. Approving 125 new homes with 930 additional vehicle trips made each day, on the heels of the recently approved Montecito Project of 417 homes with 883 vehicle trips daily, will severely negatively impact an already heavily congested and dangerous roadway. The concern is both of bumper to bumper traffic during rush hour, and the prospect of more head-on collisions as people take chances passing (out of frustration). This is really a Public Safety Issue. There is no plan to Upgrade the LOS F rating on Hwy 67 between Poway Road & Archie Moore or between Archie Moore & Highland Valley Road.

T-4 3. **Loss of biological resources**. The hills, scrub, and grasslands/wetlands of Area A, in addition to the grasslands and riparian habitat of Areas B & C, are known foraging areas for numerous raptors, including the Golden Eagle, Bald Eagle, Red-Shouldered hawk, Ferruginous hawk, Coopers hawks, White-tailed Kites, Turkey Vultures, Red-tailed hawks, Kestrels and owls, to name a few. In fact, Area A was once used as a prime viewing area for the local hawk-watch group. It is preposterous to think that the proposed small islands of "open space" amidst clusters of suburban type dwellings/parcels will remain a safe and useful forage and nesting area to wildlife. Loss of this forage/nesting habitat means a loss of vital biological resources for both the community of Ramona and for the County of San Diego.

T-5 4. **Growth inducement & habitat/waterway degradation**. Inclusion of a sewer system to serve the proposed development clearly paves the way for major development on the west end of Ramona resulting in the blockage of wildlife corridors. Additionally, construction for sewer connection would occur directly thru the heart of the Ramona Grasslands. Sewage lines will cross sensitive waterways with potential of sewage spill into the Etcheverry and Santa T-6 Maria drainage systems, and thru a well-known major floodplain. This water not only feeds the aquifers & wells of surrounding properties downstream, but also flows into Lake Hodges – a municipal water supply.

T-7 5. Lastly, from an **aesthetics** point of view, entrance into Ramona is officially designated at the Hwy 67 - Highland Valley Road interchange with a hand-crafted metal welcome sign displaying the setting of Ramona: horses, raptors, mountains. Placement of one-acre residential lots approaching this entrance sign would contradict the historically equestrian nature & expansive openness that is Ramona. These homes would also not be in keeping with the County's designation of Hwy 67 as a "Scenic Highway".

Sincerely,
Michael B Berthiaume

Letter T
Mike Berthiaume

T-1
Comment T-1 contains introductory statements and does not raise a specific issue regarding the adequacy of the Project EIR. No response is necessary.

T-2
Land Use, Section 4.1.4 of the Draft EIR, provides an analysis of the land use and environmental compatibility of the project with the surrounding community, including the adjacent Ramona Town Center and rural residential lots within the vicinity of the project site. Contrary to the comment, the Cumming Ranch project would provide development characteristic of a rural setting with a decrease in density under that allowed by the current S88 zoning (from 0.25 to 0.18, or about one residence per 5 acres). The recently adopted General Plan Land Use Map designates 194.5 acres of the project site with an SR-2 designation (1 dwelling unit per 2 acres), 236.6 acres with an SR-10 designation (1 dwelling unit per 10 acres), and the remaining 251.5 acres with an RL-40 designation (1 dwelling unit per 40 acres). Based on this land use distribution, the total number of dwelling units allowed on the project site would be 125 units. Additionally, the project would add a description of the proposed Cumming Ranch Specific Plan to Section 6 of the Ramona Community Plan. The description would specify a density of 0.18, and allow no more than 125 single-family residences with a minimum 1-acre lot size in Area A. This description addition is consistent with the recently adopted General Plan.

The project contains residences that are grouped together, not clustered, on 1 to 3.1 acres per lot, with the average lot size being 1.5 acres. These residential lots are set within eight large open space lots resulting in the appearance of openness, with the average lot size of Area A being 2.9 acres when the open space lots are included in the calculation. While some lots are smaller than some other surrounding rural residential lots, the project design includes significant open space, no street lights, the keeping of horses and other large animals, agricultural use, preservation of significant hills, drainages, and other natural features such that the community will view mostly open rural space from public viewpoints. The result is that the project is functionally and visually compatible with the rural community character west of Ramona Town Center.

T-3
The comment related to the project traffic contribution on Highway 67 and traffic safety is addressed in Response to Comment S-2.

T-4
All raptor species listed in the comment have been analyzed for significant impacts in the Draft EIR, Section 3.1, as being known to the project site or general area. As recommended by the USFWS, a new study was completed that included golden eagle and white-tailed kite surveys and a habitat assessment to determine potential project-related impacts to foraging habitat as well as impacts from recreational use. The Draft EIR determined that the potential impacts to raptors would be less than significant with appropriate mitigation as detailed in Section 3.1.6. The eagle study verified the Draft EIR's findings and found that the proposed Cumming Ranch project would have less than significant impacts on foraging habitat and less than significant impacts due to recreational uses. See Response to Comment A-8 for additional details.

The Cumming Ranch project would provide 457.4 acres (67 percent of the property) of open space for inclusion in the Ramona Grasslands Preserve benefiting raptors and resident wildlife. Section 3.1 of the Project EIR provides detailed analysis regarding wildlife species, including bird and raptor species on the project site and within the surrounding grasslands, and found that potential impacts would be less than significant with appropriate mitigation. A significant impact to raptor species was identified as Impact BI-15 with indirect impacts to raptor species identified in Impacts BI-16 and BI-17. Mitigation provided for these impacts, including construction limitations, grading monitoring, implementing a Resource Management Plan, providing open space signage, and limited building zone restrictions (Mitigation Measures M-BI-15, M-BI-16, and M-BI-17) was found to reduce potential impacts to raptor species to below a level of significance.

The commenter does not provide any basis for the statement that 1-acre lots would result in the loss of the preserve because the project proposes a low density development with 1 to 3.1-acre residential lots. Since, the comment is not supported by a factual basis, it is assumed to be a personal opinion. No further response is necessary.

T-5
Growth-inducing Effects, Section 1.7 of the Project EIR, analyzes the potential for the sewer service to the project site to result in or facilitate additional growth. The analysis accounts for the offsite infrastructure into the adjacent Hardy Ranch as well as the Spirit of Joy church project. The analysis found that the project would not create significant growth inducing impacts due to sewer expansion or other means. Regardless, approval of other projects in the vicinity would require both the assurance of wastewater treatment (septic or sewer) and site-specific analysis of wildlife movement impacts from development, so the assertion that the project will result in significant growth induction and blockage of wildlife corridors is false.

T-6
The comment is related to sewer lines that are in or adjacent to the grasslands and drainages; the potential for drinking water effects if there are sewage spills is addressed in Response to Comment S-4.

T-7
The Project EIR concluded that visual impacts from the proposed project to motorists on SR 67 as they enter the Ramona community were less than significant. The local designation of SR 67 as a scenic highway is discussed in Section 3.4 of the Draft EIR. Views from SR 67 were considered in Key Views 1 and 2 as described in Section 3.4 of the EIR and shown in the visual simulations provided in Figures 3.4-3 and 3.4-4. The project has been designed with large open space lots (Lots A and B) between SR 67 and planned development that would minimize the future view of residences from the roadway. Physical features onsite, such as trees, boulders, etc., are incorporated into the residential lots' design. All of the major ridgelines, larger groups of rock outcroppings, heavily wooded areas, and major drainage areas on the property are preserved and included within open space areas. The use of native plantings within the landscape plan is intended to allow the project to integrate with the adjoining preserve areas. These features of the design reduce potential visual impacts of the project and maintain views of the scenic vistas from SR 67.

Shelley J Berthiaume
17289 Voorhes Lane
Ramona, CA 92065

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DPLU-PPRGCC

December 16, 2010

Mr. Larry Hofreiter
County of San Diego
Department of Planning and Land Use
5201 Ruffin Road, Ste B
San Diego, CA 92123

Subject: Comments on the Proposed Cumming Ranch Project
GPA 03-007; SP 03-005; TM 5344; REZ 07-002, LOG NO. 03-09-028; SCH NO. 2004031136

Dear Mr. Hofreiter:

U-1 In review of the DEIR for the Cumming Ranch Project I have significant concerns regarding the impact such a proposal could have on the community of Ramona. Specifically:

U-2 1. The proposed project is not in keeping with the **rural community character** of the West End. Parcels in the adjacent and nearby surrounding areas are agricultural in nature with large animal-keeping, ranching, and dry-land farming. Parcels directly adjacent the project south of HV Road average 3.5 acres, parcels to the northwest of Area A average 10.7 acres, and the proposed 2020 General increases the minimum lot size to 10 acres north of HV Road. The Cumming Ranch Project proposal of an average lot size of 1.6 acre (suburban-like parcels), most devoid of large animal-keeping, is in stark contrast to the surrounding rural area and is inappropriate.

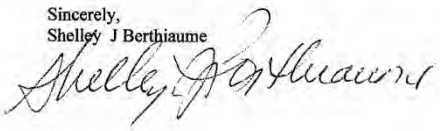
U-3 2. **Degradation of transportation corridor**: Hwy 67, from Poway Road to Archie Moore and Highland Valley Road is already deemed Grade F (worst grade possible) by the county. Approving 125 new homes with 930 additional vehicle trips made each day, on the heels of the recently approved Montecito Project of 417 homes with 883 vehicle trips daily, will severely negatively impact an already heavily congested and dangerous roadway. The concern is both of bumper to bumper traffic during rush hour, and the prospect of more head-on collisions as people take chances passing (out of frustration). This is really a Public Safety Issue. There is no plan to Upgrade the LOS F rating on Hwy 67 between Poway Road & Archie Moore or between Archie Moore & Highland Valley Road.

U-4 3. **Loss of biological resources**. The hills, scrub, and grasslands/wetlands of Area A, in addition to the grasslands and riparian habitat of Areas B & C, are known foraging areas for numerous raptors, including the Golden Eagle, Bald Eagle, Red-Shouldered hawk, Ferruginous hawk, Coopers hawks, White-tailed Kites, Turkey Vultures, Red-tailed hawks, Kestrels and owls, to name a few. In fact, Area A was once used as a prime viewing area for the local hawk-watch group. It is preposterous to think that the proposed small islands of "open space" amidst clusters of suburban type dwellings/parcels will remain a safe and useful forage and nesting area to wildlife. Loss of this forage/nesting habitat means a loss of vital biological resources for both the community of Ramona and for the County of San Diego.

U-5 4. **Growth inducement & habitat/waterway degradation**. Inclusion of a sewer system to serve the proposed development clearly paves the way for major development on the west end of Ramona resulting in the blockage of wildlife corridors. Additionally, construction for sewer connection would occur directly thru the heart of the Ramona
U-6 Grasslands. Sewage lines will cross sensitive waterways with potential of sewage spill into the Etcheverry and Santa Maria drainage systems, and thru a well-known major floodplain. This water not only feeds the aquifers & wells of surrounding properties downstream, but also flows into Lake Hodges – a municipal water supply.

U-7 5. Lastly, from an **aesthetics** point of view, entrance into Ramona is officially designated at the Hwy 67 - Highland Valley Road interchange with a hand-crafted metal welcome sign displaying the setting of Ramona: horses, raptors, mountains. Placement of one-acre residential lots approaching this entrance sign would contradict the historically equestrian nature & expansive openness that is Ramona. These homes would also not be in keeping with the County's designation of Hwy 67 as a "Scenic Highway".

Sincerely,
Shelley J Berthiaume



Letter U
Shelly Berthiaume

U-1
Comment U-1 contains introductory statements and does not raise a specific issue regarding the environmental analysis provided in the Project EIR. No response is necessary.

U-2
For the response to the identical comment, see Response to Comment T2

U-3
The comment related to traffic congestion and safety on SR 67 is addressed in Response to Comment S-2.

U-4
For the response to the identical comment, see Response to Comment T4

U-5
For the response to the identical comment, see Response to Comment T-5.

U-6
The comment is related to sewer lines that are in or adjacent to the grasslands and drainages and the potential for drinking water effects if there are sewage spills is addressed in Response to Comment S-4.

U-7
For the response to the identical comment, see Response to Comment T-7.

From: Rick & Wanda Crook [mailto:crookw-r@att.net]
Sent: Tuesday, December 14, 2010 1:13 PM
To: Hofreiter, Larry
Subject: RE: Cumming Ranch Follow-up

Hello Larry:

V-1 Thank you for the thorough information you provided below. We eventually manually operated the GIS system to focus in on Ramona.
Just one question for you regarding your comment below on additional GIS analysis-- When (by what date) would I have needed to make a request for this analysis, so that staff would have done it?

Regards,
Rick Crook

Letter V
Rick and Wanda Crook

V-1
This comment is directed to County staff regarding GIS analysis tools and does not address the analysis presented in the Project EIR. No response is necessary.

Rick & Wanda Crook
17281 Voorhes Lane
Ramona, CA 92065

December 20, 2010

Mr. Larry Hofreiter
County of San Diego
Department of Planning and Land Use
5201 Ruffin Road, Ste B
San Diego, CA 92123

Subject: Comments on the Proposed Cumming Ranch Project
GPA 03-007; SP 03-005; TM 5344; REZ 07-002, LOG NO. 03-09-028; SCH NO. 2004031136

Dear Mr. Hofreiter:

V-2 In review of the DEIR for the Cumming Ranch Project I have significant concerns regarding the impact such a proposal could have on the community of Ramona. Specifically:

1. **Liquid Sewage Waste Spray Fields**—This item is not addressed in either the DEIR or the GPA Report & Specific Plan. The RMWD has stated publicly that they must use part of Area B for spray fields or they cannot support the proposed project. I demand that an engineering study be performed on the possible **environmental effects** of adding spray fields to Area B. My concern is that spray fields will lead to:

V-3
a) Increasing the salinity of the groundwater serving the wells which draw from the Aquifer;
b) Increase of the salinity of the soils and thus negatively impacting the vegetation and local habitats; and
c) Contaminating the wells downstream with e-coli and/or coliform bacteria.

In regards to items (a) and (b) above, in the image below (taken from the GPA Report & Specific Plan), the red arrows show surface water flow in the area of the project. The red dot shows where the two streams join, and the blue oval indicates the properties in the path of the water flow. These properties on Voorhes Lane do not have access to municipal water, so their only drinking
V-4 water is from wells drawing from the surrounding aquifer. If the wells become contaminated with coliform bacteria from the sewage effluent, or too high in salinity, also due to the effluent, the owners will incur major expenses in order to have potable water, and/or their property values will plummet due to lack of potable water for home, livestock, and agriculture. The parcels along Voorhes Lane are zoned for agriculture. Impairment of water quality will directly affect owners' livelihood and property value.

V-2
Comment V-2 provides introductory statements and does not provide specific comment on the analysis in the Project EIR. No response is necessary.

V-3
The project description does not include spray fields. The Specific Plan designates Areas A and B as open space and specifically excludes spray fields as an allowed use. Wastewater treatment services will be provided by the Ramona Municipal Water District (RMWD) and the project has the appropriate and required Project Facility Availability Form (attached to these Response to Comments). Conditions of service do not require use of the project site as spray fields (note – the approved Santa Maria Waste Water Treatment Plant Expansion Project includes spray field capacity for 1,216 new dwelling units including Cumming Ranch). The EIR therefore does not evaluate the use of Area B or any other onsite or offsite area for spray fields.

A potential change to allow spray fields on Cumming Ranch would require vacating open space easements or changing the uses allowed in the open space land use designation (a specific plan amendment). These actions would require a separate environmental analysis and approval by the Board of Supervisors. Also note that the upland soils on Area B are mostly clay with very slow infiltration rates (Hydromodification Analysis), and with the presence of wetlands and sensitive resources, this area is not suitable for spray fields.

V-4
The comment provides a description of the drinking water source from local wells for residents along Voorhes Lane and details concerns regarding contamination. The project would not result in contamination of any local well water source and would not adversely affect the property owners reliant on that water source for drinking water and for agricultural operations. Contrary to the commenter's assertion, the EIR adequately evaluates the potential hydrology and water quality impacts that would result, consistent with the project's description, and no additional response is necessary. No onsite spray fields are proposed.

V-5

2. **Sewage Lift Station (contamination of ground-water)**— The location of the "pump station" is dangerously close to the feeder to the Etcheverry Creek. My concern is that flooding of this pump station could release raw sewage into the Etcheverry Creek and contaminate the wells of the properties shown in item #1 above.

V-6

During heavy rains in January 2005, the RWMD Santa Maria Wastewater Treatment Plant did experience a sewage spill (see **Appendix A**) resulting in sewage discharge into Santa Maria Creek and subsequent private well contamination with e-coli and other coliform bacteria.

Since I cannot be certain how accurate your maps are with respect to the 100-year flood plain, please refer to the two images below. In the 1st image, extracted from the GPA Report & SP, I have circled the pump station in red and have circled an existed large stand of rocks/boulders in blue. Note that this pump station is much closer to the private residences on Voorhes than the Santa Maria water treatment plant. The 2nd image/photo below was taken after a large rainfall in 2005 and is looking at the rock/boulder area in the blue oval.

V-7

The Etcheverry Creek flows <u>behind</u> the rocks in this photo and the feeder to the Etcheverry flows in front of the rocks. This feeder contains all the runoff from Sub Areas 1, 2, 3, 4, 6. There have been larger rainfalls than this one in Jan 2005, but I do not have photos of them. I request that an <u>engineering study</u> be performed to **locate the pump station a "safe" distance away** from the Etcheverry Creek to fully protect the wells of the neighbors on Voorhes Lane— which could result in locating the pump station further outside of the so-called 100-year flood zone. (Note: I expect faster & more rain run-off to occur from the Cumming Ranch asphalt streets & driveways, which would make the type of flooding you see above more common once the project is completed.)

V-8

V-5
The conditions of approval for the project require that the lift station shall be located outside of the "area subject to inundation per 100-year flood" and that the lift station shall be placed a minimum of 2' above the flood water elevation. As described under Utilities in Section 1.1.2 of the Draft EIR, the sewer lift station would be equipped with a backup emergency generator that would provide emergency power to ensure that the lift station would not flood or overflow due to power loss. Therefore, the EIR correctly determined that cumulative drainage and hydrology impacts would be less than significant.

V-6
The comment describes an overflow situation at the RMWD Santa Maria Waste Water Treatment Plant and it could affect local groundwater supply. This comment does not address the analysis provided in the Project EIR or a component of the proposed project and no additional response is necessary.

V-7
A technical drainage study determined that the lift station as shown on the tentative map/preliminary grading plan is located outside of the "area subject to inundation per 100-year flood". The conditions of approval require that the lift station shall be placed a minimum of 2 feet above the flood water elevation. Lines of inundation for the 100-year flood were calculated in Drainage Study for Cumming Ranch TM, dated December 8, 2004. These calculated lines of inundation match the flood lines as shown on the floodplain maps on file with the County of San Diego for Santa Maria Creek.

V-8
Section 4.1.1 of the Project EIR provides details regarding hydrologic changes that would result with implementation of the Cumming Ranch project, as determined by the hydrology studies prepared for the Cumming Ranch project, including the Hydrology and Drainage Study and Storm Water Management Plan. Flooding hazards are discussed on pages 4-11 and 4-12 and the hydrology studies indicate that runoff from the proposed project would be at or below predevelopment conditions due to lengthened flow paths, reduction of slope, and improved quality of vegetative cover to enhance infiltration of surface storm discharge.

Prior to approval of the Final Map, the applicant is required to submit detailed design-level plans that include a combination of Low Impact Development (LID) source control and structural treatment best management practices (BMPs) that at a minimum will:

- Control the post-development peak storm water runoff discharge rates and velocities to maintain or reduce pre-development downstream erosion;
- Conserve natural areas;
- Minimize pollutants of concern from urban runoff through implementation of source control BMPs;
- Remove pollutants of concern from urban runoff through implementation of site design, source control, and structural treatment BMPs implemented close to pollutant sources and prior to discharging into receiving waters;
- Minimize directly connected impervious areas;
- Protect slopes and channels from eroding;
- Include storm drain stenciling and signage;
- Include properly designed outdoor material and trash storage areas; and
- Ensure that post-development runoff does not contain pollutant loads that have not been reduced to the maximum extent practicable.
- Construction (Prior to Permit Issuance, Final Map, or Use and Reliance)**.** The applicant shall ensure that the grading and other construction activities meet the provisions specified in the California RWQCB, San Diego Region, Order 2001-01, NPDES No. CAS0108758 – Section F.2, to the satisfaction of the Director of Public Works. The applicant shall submit and then implement a Storm Water Pollution Prevention Plan (SWPPP), per State project site that is necessary for construction to the requirements, to manage storm water and non-storm water discharges from the site at all times. The SWPPP shall describe all BMPs to be implemented year-round. Specific BMP implementation may be dependent upon wet or dry season operations. The SWPPP shall also emphasize that erosion prevention is the most important measure for keeping sediment onsite during construction; all to the satisfaction of the Director of Public Works.
- The applicant shall utilize sediment controls only as a supplement to erosion prevention for keeping sediment onsite during construction to the satisfaction of the Director of Public Works.
- All construction and grading related BMPs shall be shown in detail on the construction plans, improvement plans, or grading plans submitted to the County to the satisfaction of the Director of Public Works.

- The applicant shall clear and grade only those areas on the pre satisfaction of the Director of Public Works. These areas shall be clearly denoted on the plans and in the SWPPP.

- The applicant shall minimize exposure time of disturbed soil areas through scheduling of disturbance activities and storm water protection activities to the satisfaction of the Director of Public Works.

- The applicant shall submit a schedule to the County for review and approval, with proposed dates, demonstrating the minimization of grading during the wet season and coinciding the grading with dry weather periods, permanent revegetation and landscaping as early as feasible, and temporary stabilization and reseeding of disturbed soil areas as early as feasible, all to the satisfaction of the Director of Public Works. These features may be included in the project's improvement plans or grading plans as long as they are properly identified.

- The applicant shall stabilize all slopes as required by the County's Watershed Protection, Stormwater Management, and Discharge Control Ordinance, and Appendix 'A' Stormwater Standards Manual, all to the satisfaction of the Director of Public Works.

The project's LID design requirements ensure onsite treatment through dispersal of runoff to landscaped areas, filters, settling ponds, pervious pavements, bioretention facilities, flow-through planters, dry wells, infiltration basins, constructed wetlands, and/or cisterns. Where feasible and where allowed, water in cisterns may be directed to non-potable uses, augmenting water supplies. Runoff peak-and-duration-control (hydromodification management) will also be employed to simulate pre-project and post-project runoff, and mimic pre-construction conditions with the effect of LID facilities, detention basins, or other storm water management facilities within the development footprint.

V-9

3. **Impact of Entire Project on Ground Water**—On page 3-53 of the GAA Report & Specific Plan it states "*Groundwater quality may be impacted by this project. Special consideration shall be given to surrounding property owners.*" This language is a bit vague. What are the details of the "special consideration"?

On page 4-10 of the DEIR, the wording below appears:

V-10

Project construction could result in polluted runoff, which may have short-term impacts on surface water quality through activities such as grading, stockpiling of soils and materials, concrete pouring, painting, and asphalt surfacing. Pollutants could impact water quality if they are washed offsite by storm water or non-storm water, or are blown or tracked offsite to areas susceptible to washoff by storm water or non-storm water. Sediment is the most common

As is clear from the photos above, all run-off from the proposed project eventually runs toward the properties on Voorhes Lane. The well pump my family and livestock use (as our sole water supply) is located at just 80 feet below the surface. Any polluted run-off from the project construction could affect the welfare of my family and livestock. The DEIR does **not** mention any engineering study on **the construction-caused polluted run-off**, although it does quote a technical reference to the post-construction pollutants.

V-11

a) Does the technical reference on the post-construction pollutants take into account that the **water table** on Voorhes Lane is only 15 to 40 feet below the surface?

V-12

b) Was an engineering study performed on the effects of the "construction-caused" pollutants?

4. **Water run-off & erosion effects on Voorhes Lane**—On Voorhes Lane, west of the Cumming Ranch site, there has been major erosion on the dirt road caused by rain run-off from overgrazed cattle land (adjacent to Voorhes Lane to the south).

I requested assurances from the developer (Gene Driscoll) that this would not happen due to construction activity or post-construction activity on the Cumming Ranch. In a letter dated 1-Dec-2010, the developer said that he would institute a 20 foot wide vegetated buffer at the backs of the Cumming Ranch properties that adjoin Voorhes Lane that would include a fence (see item #5 below), appropriate hedge plants (see item #5 below), no bare soil, and that this area would not be disturbed or changed by the new residents of these Cumming Ranch lots.

V-13

What guarantee do the residents on Voorhes Lane have that this buffer will be properly maintained during the course of all parcel grading and construction activities? What incentive do the Cumming Ranch property owners have to maintain the buffer-zone once construction has reached completion?

5. **Perimeter Fence & Hedge plants on north edge of Area A**-- In a letter dated 1-Dec-2010, the developer said that he would build a fence at the interface between Area A and Voorhes Lane. The residents along Voorhes have discussed this and request such a fence consist of 5-7 strand barbed wire and hedge planting of native plants. Possible plant suggestions are: Ceanothus tomentosus olivaceus and laurel sumac (Malosma laurina). These would require minimal supplemental watering to establish, and none after; are indigenous to the Cumming Ranch; and will create an adequate, non-toxic barrier between the Cumming Ranch and the livestock parcels and throughways on Voorhes Lane. It would also be quite appropriate for other perimeter areas of this project.

V-9
The statement regarding groundwater quality is taken from the existing Ramona Community Plan text. The statement relates to potential threats to groundwater quality from the use of individual septic systems on private lots. The Cumming Ranch project eliminates this potential risk by installing a public sewer system and connection to the Santa Maria Wastewater Treatment Plant.

V-10
Construction-related runoff water pollution is discussed on pages 4-10 and 4-11 of the Draft EIR and includes the paragraph quoted with Comment V-10. This is the analysis and description of potential pollutants that could enter water systems through runoff including materials such as sediment, hydrocarbons, fuels, asphalt materials, oils, paints, and concrete slurries. Page 4-11 of the Draft EIR references the Storm Water Management Plan (SWMP) prepared for the proposed project that provides technical study of the potential runoff and requires best management practices (BMPs) to be implemented. The SWMP requires temporary construction BMPs to be utilized and implemented during the final design and construction of the project. The pollutant with the greatest concern during construction is sediment. Refer to Response to Comment V-8 for a description of the measures to control the potential pollutants of concern during the course of construction and methods of implementation to prevent these pollutants from discharging offsite.

V-11
The technical references (SWMP, Hydromodification Management Study, and Infiltration Feasibility Analysis) do not need to consider groundwater table depths at this time, but when grading plans are finalized, the Hydromodification Study will be updated to include Low Impact Development (LID) criteria. If there are structural LID facilities, the ability for the groundwater table to receive the drainage will be addressed. This is not a major issue because these post-construction BMPs and LID facilities must only address the contained and treated runoff from the developed site.

V-12
A certified engineer conducted a study and developed a Stormwater Management Plan for the project with measures to prevent "construction-caused pollutants" according to the National Pollutant Discharge Elimination System General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities Order No. 2009-0009-DWQ.

V-13
The letter from the project applicant to the comment referenced in Comment V-13 was issued after the publication of the Draft EIR. In that letter, the applicant proposed to install a new fence along Voorhes Lane and establish a 20-foot

buffer on the six residential lots adjacent to Voorhes Lane. The intent of the buffer is to maintain a vegetated area in order to reduce potential sediment runoff. Landscaping is allowed within the buffer but no planting is proposed as part of the current project. The provision of a 20-foot buffer and addition of fencing has been added as a project design feature to the Final EIR and analyzed for potential environmental impacts. The fencing along lots 121 through 125 will be installed before Final Map approval and will conform to the Specific Plan's Landscaping Guidelines. Maintenance of the fence and the establishment and maintenance of a vegetated 20-foot buffer are requirements of the Site Plan. The Homeowners Association (HOA) may require additional landscaping, but owners must still comply with the Site Plan.

6. **Prohibited Plants on Cumming Ranch--** The potential is high for urban / suburban people to move into the Cumming Ranch homes without knowledge of the **plants which are toxic** to livestock. While the Cumming Ranch GPA and SP does have a "Prohibited Plants" list as part of their "Landscape Concept and Revegetation" plan; the following plants, which are extremely toxic to both livestock (and often humans) are not on the list:

   A. Oleander (*Nerium oleander*)
   B. Red Maple (*Acer rubrum*); and hybrids
   C. Cherry (*Prunus genus*)
   D. Yew (*Taxus genus*)
   F. Black Locust (*Robinia pseudo-acacia*)

If any of these plants reside on the Cumming Ranch property, the result may be the death of existing livestock on adjacent properties. Santa Ana winds, and winter storm winds can blow leaves for literally miles, and if ingested, the fallen, dead leaves can kill livestock (as well as the leaves still on the plant).

I demand that the above plants must be included on the "Prohibited Plants" list and also be continually monitored by the HOA / CC&Rs, so as to protect livestock on both the West End of Ramona, including the Cumming Ranch itself.

V-14

These plants must be banned from the perimeter and **all areas** on the Cumming Ranch property.

The toxicity of Oleander has been documented in Veterinary Research Journal literature and in the local press here in Southern California. Please refer to **Appendices B, C, D** for references on Oleander toxicity.

Appendix B- 'Diagnosis of Oleander Poisioning in Livestock', California Veterinary Dignostic Laboratory.
J Vet Diagn Invest 8:358-364 (1996)

Appendix C- 'Oleander Ban Sought', Riverside Press-Enterprise, 2-14-99.

Appendix D- 'Ban on Oleanders Stands', Riverside Press-Enterprise, 3-3-2005.

Other sources listing plants toxic to livestock are:

i. http://www.vet.purdue.edu/toxic/

ii. Fuller, Thomas C. & McClintock, Elizabeth: Poisonous Plants of California; University of California Press, Berkeley, CA, 1986 ISBN: 0-520-05568-3.

iii. http://www.ars.usda.gov/main/site_main.htm?modecode=54-28-20-00

V-14
Comment noted. The plants, as recommended in Comment V-14, have been added to the Prohibited Plants list as part of the GPA, SP, and Figure 1-13 in the Final EIR. Prohibited plants are not allowed in landscaping plans reviewed and approved by the DPLU. They are also not allowed under the restrictions of the Limited Building Zone Easement.

V-15

7. **Pump Station (noise):** Due to the acoustics in the Santa Maria Creek Valley, noise from the RWMD sewage treatment plant is faintly audible to us. Undoubtably, the proposed pump station (which is much closer to us than the sewage treatment plant) would be an urban drone that would be a constant disturbance to the existing environment in the Voorhes Lane area.

V-16

It is not unreasonable to locate a sewage pump station within a new development where potential buyers have a choice over whether to purchase within the noise zone of the pump. But it is unconscionable to subject adjoining neighbors, without choice, to suffer the increased noise impact of a pump station on the edge of the new subdivision.

V-17

I request that the pump station be located between Hwy 67 and the tallest hill on the Cumming Ranch property (and not on the north side of the tallest hill). The result of this location would be to 'not impact' the existing residents on Voorhes Lane with the pump noise.

V-18

8. **Wildlife**-- As a 11 year resident of Ramona and of land adjacent to Area "A" of the Cummings Ranch SPA; I have had ample time to observe the resident zoological species that inhabit Area "A". I am concerned that the DEIR is incomplete in its findings; and, it is also contradictory within itself – 'under-playing' the value of the parcel in biological resources.

a. The addition of the following **avian** species should be added to the existing list:
   - Mallard Duck (Anas platyrhynchos)
   - Great Egret (Casmerodius albus)
   - Great Blue Heron (Ardea herodias)
   - Bald Eagle (Haliaeetus leucocephalus)
   - Say's Phoebe (Sayornis saya)
   - Black Phoebe (Sayornis nigricans)
   - Hooded Oriole (Icterus cucullatus)
   - Yellow-Rumped warbler (Dendroica coronata)
   - Lark Sparrow (Chondestes grammacus)
   - Brown-headed Cowbird (Molothrus ater)
   - Western blue bird (Sialia mexicana)
   - Cliff Swallow (Petrochelidan pyrrhonota)
   - White–Tailed Kite (Elanus caeruleus) – freq forages over Area A

b. The following **mammalian** species should be added:
   - Ground squirrel (Citellus beecheyi)
   - Skunk
   - Bats (species unknown, but are commonly seen foraging over Area A)

V-19

c. The following **amphibian** species:
   - Arroyo Toad (this has not been seen, but has been heard coming from the vernal pool in Area A on numerous occasions.

V-20

d. The Plan states that the hill tops in Area A are reserved as open space for habitat preservation – The problem is that **Sewage pump station** is placed directly in line of the "wildlife" corridor between the Area A open space and Area B/C open space. This essentially places a barrier to **wildlife corridor**. The Sewage pump station should be placed away from that corridor.

e. **Construction of pump line** to serve sewage from Cumming Ranch is proposed thru the "open space" and thru Hardy Ranch (Parks and Recreation owned). Construction of

V-15
As detailed on page 3.3-10 of the Draft EIR, the noise generated by the sewer lift station was found to be in exceedance of County Noise Ordinance daytime limits at any property line within 515 feet (Impact N-6). Thus, Mitigation Measure M-N-6 requires as part of the Minor Use Permit that the plans for the lift station and proposed enclosure include a noise study demonstrating the lift station's compliance with the daytime noise ordinance requirement of 50 dBA and nighttime requirement of 45 dBA at the property line pursuant to the County Code Noise Ordinance, Section 36.404. This would require the installation of the lift station to meet the County Code Noise Ordinance requirements and decrease the audible noise to surrounding residential properties to an acceptable (mitigated) level.

V-16
As noted above and detailed within the Project EIR and Noise Study (Appendix F of the EIR), the lift station will have a design that limits audible noise at the property line in accordance with the County Code Noise Ordinance. The location of the sewer lift station has been engineered to operate at the lowest elevation of the proposed sewer system so the effluent in the sewer pipes moves to the station by gravity, then is pumped to the treatment plan from there.

V-17
See Response to Comment V-16. The comment is noted; however, it does not raise a specific issue related to the adequacy of the EIR. The lift station was located by engineering and site design constraints. If the lift station was moved as requested, a supplemental lift station would be required at the current location to pump the effluent from the proposed lots near Voorhes Lane to the suggested lift station location.

V-18
The Project EIR and associated biological studies have been prepared by County-approved biologists in accordance with County guidelines and requirements, and have been reviewed by County staff. Many common wildlife species occur within the project site, and not all can be observed and listed in the Zoological Resources List of a Biological Technical Report. However, after reviewing the Zoological Resources List for this project (Appendix B of the Final EIR) in response to public comments, staff found that the list had not included all of the species from previous report attachments on file at DPLU and several new species are now included on the list.

Other species are rare and would not generally be expected to be observed and included in a survey report. These species are discussed in a separate table (Table 2: Potential for Occurrence of Sensitive Zoological Species). Other species such as bald eagle had been included in the discussion on page 3.1-15

of the Draft EIR or have undergone a name change, and the updated names are on the list (white-tailed kite and Beech's ground squirrel). Additional animals, such as skunks and migratory birds (generic terms for a group of species), are discussed in the text of the BTR (pages 24–26). Therefore, changes to Table 3.1-4 from the Final EIR and Table 2 from the Biological Technical Report have been made, but this information merely clarifies or amplifies the information contained in the EIR and the content is not substantial new information.

V-19

Specific arroyo toad surveys have been completed on the project site. The arroyo toad was not found on the project site; however, because the site contains appropriate habitat for the toad a significant impact was identified (Impact BI-15). Mitigation measure M-BI-15a provides specific measures to avoid potential impacts to the species if it is found onsite prior to grading. The commenter's arroyo toad observation from the vicinity of the vernal pool in Area A would be unlikely due to unsuitable estivation soils and unsuitable breeding habitat; the calls would have likely been from other more common amphibians.

V-20

Dimensions of the lift station enclosure have not yet been established, but a typical structure would be approximately 20 feet by 30 feet. This structure will be small, relative to the open space area surrounding it. Additionally, the lift station will operate quietly and require only minimal human activity due to occasional maintenance. Therefore, it will not significantly affect wildlife species from moving through the area or from utilizing the area. See Response to Comment V-17 regarding the relocation of the lift station.

Impacts to wildlife from construction of the pump station and pipelines were addressed as part of the project infrastructure in Chapter 3.1 in the Final EIR. Both direct and indirect impacts of construction were considered to be significant impacts (Impacts BI-15, -16, and -17). Certain limitations on the timing of construction will apply as well as pre-construction surveys for avoidance of certain sensitive species. Construction will be monitored by a biological consultant with the limits of construction clearly marked. Sensitive areas and open space will be avoided with an adequate buffer. With these measures in place, the impacts will be reduced to less than significant.

the pump station and pipeline will create significant upset to wildlife thru Areas A, B, and Hardy Ranch.

V-21

f. The current area of dryland farming hold numerous colonies of ground squirrels (Citellus beecheyi) and cotton tail rabbits (Sylvilagus audubonii) which are **prey-base for the raptors** in the region. Loss of this habitat would result in loss of foraging area, less forage = fewer raptors = loss of biological species, including the golden and bald eagles.

g. **Scrub** to be removed provides food for smaller animals that are prey for eagles (food chain)

9. **Area B**— One of the reasons that the Ramona Community Planning Group endorsed the current Cumming Ranch map is that the RCPG was told that the project is giving all the acreage in Areas A & B to Ramona.

In the Cumming Ranch General Plan Amendment Report & Specific Plan, on page 3-2 it states that "*Acreage in Area B will be made available by owner for purchase for preservation in the Ramona Grassland Preserve. . . .*"

V-22

There is no guarantee that Area B will really be sold, since the Option Agreement (mentioned on page 2-9) has not been publicly finalized. Until Area B is sold, this land could still be used for further housing units than planned in Area A. This would not be an acceptable outcome as the stated reason for Area A's smaller lot sizes than the surrounding parts of the West End is that Cumming Ranch will not build in Area B.

Legal transfer of Area B to "open space preserve status in perpetuity" must be a **Condition for Project Approval**.

10. **Drainage & Erosion into Vernal Pool**—While the concept of vernal pool preservation in this project is highly appreciated; the health and well-being of the vernal pool preserve in Section A (far Northwest corner of the project) is not being addressed in this plan and is at risk.

V-23

A close look at the land contours and water flow patterns in this portion of the plan clearly shows drainage from proposed lots 118 through 120 directly into the vernal pool. Grading of the hillside for parcel, pad, and roadway formation can result in degradation of the vernal pool thru erosion into the pool. Furthermore, pesticides and herbicides used by future residents of those parcels will drain into the pool, negatively impacting the sensitive life-forms; eventually destroying the vernal pool.

Removal of housing sites within the watershed of the vernal pool is strongly recommended.

V-21

As noted on page 1-16 of the Draft EIR, dry land farming operations would continue in the immediate term within Area B; however, changes in Area B from dry land farming to preserved grasslands and scrub habitat would not significantly affect raptor foraging. As noted in Table 3.1-5, there would be preservation of 188 acres of grasslands/pasture and 53 acres of coastal sage scrub habitat onsite. Furthermore, it is possible that certain agricultural uses, particularly dry land farming or grazing, could continue on Area B, dependent on the recommendations of the resource manager. In addition, a raptor study for the project site was performed and the study found that the proposed Cumming Ranch project development would have less than significant impacts on foraging habitat. See Response to Comment A-8 for additional details.

V-22

It is correct that the County cannot guarantee the sale of Area B. As detailed on page 1-19 of the Draft EIR, the specific plan required for implementation of the proposed project designates Area B as Open Space (OS-2), which does not allow development. In addition, because portions of Area B are being set aside for mitigation purposes, development would be precluded.

V-23

As described in Response V-8, the Storm Water Pollution Prevention Plan (SWPPP) requires specific measures based on study of the project site to eliminate project runoff from the site during construction. The required measures would reduce any potential impacts to the vernal pool during construction activities. The nearest lot line (Lot 120) to the vernal pool is more than 100 feet away. The residential building pad within this lot is separated from the vernal pool by an additional 100 feet. Because the natural contours of the lot would remain, it is correct that drainage from this lot, and others in the sloped area, would continue to drain toward the pool area. However, the hydrology studies indicate that runoff from the proposed project would be at or below predevelopment conditions due to lengthened flow paths, reduction of slope, and improved quality of vegetative cover to enhance infiltration of surface storm discharge. The lots in this location are large and a substantial portion of the lot areas would remain as pervious surface, allowing for infiltration of runoff. Additionally, the cismontane alkali marsh and nonnative grasslands located between the development area and the vernal pool would remain and continue to provide natural bio-filtration prior to runoff entering the vernal pool area, minimizing any potential for degradation of the pool from increased runoff volume or pollutants. Thus, the vernal pool would not be adversely impacted by runoff once the proposed project is implemented.

11. **Community Character--** The average lot size of all the surrounding properties that border Sub-Area 5 (to the north & west) is 10 acres. Many of the current residents keep large animals (horses, llamas) on their properties, with ample room for the animals to run around.

V-24

The proposed lot sizes for the Cumming Ranch are not consistent with this type of environment. The new residents of the Cumming Ranch will not be able to "run" horses and have a barn on the proposed lots if their lot size is so small. A better 'transition' to the 10 acre lots adjoining Sub-Area 5 is more like **5 to 6 acres lots in the Cumming Ranch in Sub-Area 5**. The type of residents more likely to blend in with the existing residents in this area are those who would buy 5-6 acres lots and not 1-2 acre lots.

Respectfully submitted,

Rick Crook
Wanda Crook
17281 Voorhes Lane
Ramona, CA 92065

V-24

While there are residential lots bordering portions of the project site that are 5 acres or larger in size, much of the project development is set away from this existing development. Along Voorhes Lane, only the rear of the proposed lots would face the existing development with a buffer, fencing, and the street between existing and proposed lots. Animal keeping would be allowed where appropriate within the Cumming Ranch project, including corrals, barns, or stables. Therefore, the comment does not appear to have merit regarding conflict over transitional areas, especially at Voorhes Lane. For the response related to character and planned growth for the Ramona community, see Response to Comment T-2.

Carlo & Julia Guy
18030 Highway 67
Ramona, CA 92065
November 5, 2010

Larry Hofreiter
Department of Planning and Land Use
5201 Ruffin Road, Suite B,
San Diego, CA 92123

Dear Mr. Hofrieter:

W-1 In response to the notice of public review of the General Plan Amendment and the Specific Plan as it relates to the Cumming Ranch Project in Ramona, and specifically with respect to the portion of that project south of Highland Valley Road I wish to raise an objection.

W-2 I believe the proposed changes to the general plan contravene the statements and intent of the Ramona Community Plan policy in that it does not represent a *"residential development that is compatible in scale and intensity with existing neighborhoods"* nor that it is *"... in harmony with... agricultural and equine activities."*

Specifically an extended development of houses on 1-1.5 acre lots is unprecedented in this neighborhood. The proposed site is bordered by ten properties sharing significant property lines; these properties range from over two acres to over ten acres (average is 5.8 acres). The statement in the public review draft *"to the south and west... are residential homes on lots mostly ranging in size from 1 to 5 acres."* is patently false. The neighborhood contains vineyards, smallholdings and equestrian areas with the few smaller one acre parcels in clusters restricted to small zones along the major roads.

W-3 The proposed development would be incompatible with wine grape growing (one of Ramona's key growth areas) as all of the proposed lots would be too small to contain the four acre minimum parcel size recommended by the County's own guidelines. That it would be incompatible with raising horses and other large animals (as is acknowledged in the EIS) of course further marks the proposed development as not *'in harmony'* with its neighbors.

W-4 The majority of properties in this area of Ramona are restricted to a two acre minimum lots size; with building this development, that paradigm would change to a one acre minimum. It is inconceivable that *"additional growth beyond this project-specific development would not be induced by the project"* as stated in the EIR. Once the door is

Letter W
Carlo and Julia Guy

W-1
This comment contains introductory statements and notes the commenter's objection to development south of Highland Valley Road. The commenter's opinion is acknowledged and is included in the project's Final EIR for the decision makers to consider. No additional response is necessary.

W-2
Language in the Final EIR has been modified to more clearly describe the surrounding residential lots. The County of San Diego acknowledges that there are lots surrounding portions of the project site that are 5 acres or larger in size. However, there are also many smaller residential lots in the immediate area, as well as the adjacent Ramona Town Center. This information merely clarifies or amplifies the information contained in the EIR and the content is not substantial new information. Land Use, Section 4.1.4 of the Project EIR, provides a policy analysis and discussion of the compatibility of the project with the surrounding community, including the adjacent Ramona Town Center and rural residential lots within the vicinity of the project site. Also refer to Response to Comment T-2.

W-3
The commenter is incorrect in stating that County policy recommends grape growing on a minimum of 4 acres. The Zoning Ordinance allows grape growing and processing without restriction on all residential lots within the proposed project. Wholesale limited wineries or boutique wineries can be established with the required permits. Please see section 6910 of the Zoning Ordinance. Contrary to the commenter's opinion, lots of 1 to 4 acres are large enough for horses and for large animals. As described on page 1-14 of the Draft EIR, horses are allowed on all the lots, and larger animals would be allowed based on the size of the lot under the "L" Neighborhood Regulation. Individual homeowners will be required to comply with the requirements of the Specific Plan, Limited Building Zone Easements, County Zoning Ordinance, and other applicable regulations. Land use conflicts are not expected.

W-4
The proposed minimum 1-acre lots would be allowed by the proposed specific plan, which would limit density in the residential area of the project to 0.35 dwelling units per acre and overall density for the entire project site to 0.18 dwelling units per acre. In comparison, much of the surrounding area has a 2-acre minimum lot size, which corresponds to a density of 0.5 dwelling units per acre. Therefore, the County disagrees that the proposed project would result in a paradigm change related to lot size or density as compared to much of the surrounding area. Growth-inducing effects were analyzed in Section 1.7 of the

Project EIR. The analysis determined that the development of the project site would not result in or facilitate significant growth in the surrounding area. With the recently adopted General Plan, the current and future ability of property owners to subdivide lots is restricted by the density specified in the General Plan and the community's policies on lot size. Implementation of the Cumming Ranch project does not affect these policies on surrounding lots.

opened to higher density developments in this neighborhood, there would be nothing to justify preventing parcel owners from splitting their lots to a similar size.

W-5 In short the project as proposed would change this neighborhood from rural to suburban; other than a higher return for the developer there is no justification for making this change, particularly when the 'Reduced Project Alternative' as described in the EIR would mitigate these issues and appears a viable alternative.

W-6 Finally, given the recent designation of Ramona as one of only 188 American Viticulture Areas and the explosion of interest in Ramona wines, the idea that agricultural land in Ramona is redundant is premature. I would recommend at least a ten year embargo against the large scale de-zoning of agricultural land to make sure that we do not kill the resurgence of this business in its infancy.

Sincerely,

Carlo & Julia Guy
Homeowners

W-5
The project would introduce residential features to a currently undeveloped property; however, the character of the neighborhood would remain rural residential (see Response to Comment T-2). The Reduced Project Alternative included for analysis in the Project EIR would introduce similar residential features as the proposed project, such as homes, roadways, etc. The Reduced Project Alternative was determined not to be the preferred alternative for numerous reasons. As detailed in Section 5.5.2, these reasons include isolation of the main knoll and ridgeline, encroachment into upland habitats, loss of unique landforms, and reduced connectivity to the area grasslands.

W-6
This comment does not raise an issue regarding the adequacy of the Project EIR. The Cumming Ranch property has not been used for wine grape production in the past. However, applicable land use regulations do not prohibit that use on private lots in the future. The proposed development of the Cumming Ranch project would not affect offsite areas from developing future wine grape agriculture.

Elfta Hilzman
17275 Voorhes Ln.
Ramona, CA 92065

December 16, 2010

Mr. Larry Hofreiter
County of San Diego
Department of Planning and Land Use
5201 Ruffin Road, Ste B
San Diego, CA 92123

Subject: Comments on the Proposed Cumming Ranch Project
GPA 03-007; SP 03-005; TM 5344; REZ 07-002, LOG NO. 03-09-028; SCH NO. 2004031136

Dear Mr. Hofreiter:

X-1 In review of the DEIR for the Cumming Ranch Project I have significant concerns regarding the impact such a proposal could have on the community of Ramona. Specifically:

X-2 1. The proposed project is not in keeping with the **rural community character** of the West End. Parcels in the adjacent and nearby surrounding areas are agricultural in nature with large animal-keeping, ranching, and dry-land farming. Parcels directly adjacent the project south of HV Road average 3.5 acres, parcels to the northwest of Area A average 10.7 acres, and the proposed 2020 General increases the minimum lot size to 10 acres north of HV Road. The Cumming Ranch Project proposal of an average lot size of 1.6 acre (suburban-like parcels), most devoid of large animal-keeping, is in stark contrast to the surrounding rural area and is inappropriate.

X-3 2. **Degradation of transportation corridor**: Hwy 67, from Poway Road to Archie Moore and Highland Valley Road is already deemed Grade F (worst grade possible) by the county. Approving 125 new homes with 930 additional vehicle trips made each day, on the heels of the recently approved Montecito Project of 417 homes with 883 vehicle trips daily, will severely negatively impact an already heavily congested and dangerous roadway. The concern is both of bumper to bumper traffic during rush hour, and the prospect of more head-on collisions as people take chances passing (out of frustration). This is really a Public Safety Issue. There is no plan to Upgrade the LOS F rating on Hwy 67 between Poway Road & Archie Moore or between Archie Moore & Highland Valley Road.

X-4 3. **Loss of biological resources**. The hills, scrub, and grasslands/wetlands of Area A, in addition to the grasslands and riparian habitat of Areas B & C, are known foraging areas for numerous raptors, including the Golden Eagle, Bald Eagle, Red-Shouldered hawk, Ferruginous hawk, Coopers hawks, White-tailed Kites, Turkey Vultures, Red-tailed hawks, Kestrels and owls, to name a few. In fact, Area A was once used as a prime viewing area for the local hawk-watch group. It is preposterous to think that the proposed small islands of "open space" amidst clusters of suburban type dwellings/parcels will remain a safe and useful forage and nesting area to wildlife. Loss of this forage/nesting habitat means a loss of vital biological resources for both the community of Ramona and for the County of San Diego.

X-5 4. **Growth inducement & habitat/waterway degradation**. Inclusion of a sewer system to serve the proposed development clearly paves the way for major development on the west end of Ramona resulting in the blockage of wildlife corridors. Additionally, construction for sewer connection would occur directly thru the heart of the Ramona
X-6 Grasslands. Sewage lines will cross sensitive waterways with potential of sewage spill into the Etcheverry and Santa Maria drainage systems, and thru a well-known major floodplain. This water not only feeds the aquifers & wells of surrounding properties downstream, but also flows into Lake Hodges – a municipal water supply.

X-7 5. Lastly, from an **aesthetics** point of view, entrance into Ramona is officially designated at the Hwy 67 - Highland Valley Road interchange with a hand-crafted metal welcome sign displaying the setting of Ramona: horses, raptors, mountains. Placement of one-acre residential lots approaching this entrance sign would contradict the historically equestrian nature & expansive openness that is Ramona. These homes would also not be in keeping with the County's designation of Hwy 67 as a "Scenic Highway".

Sincerely,

Elfta Hilzman

Letter X
Elfta Hilzman

X-1
Comment X-1 contains introductory statements and does not raise a specific issue regarding the environmental analysis provided in the Project EIR. No response is necessary.

X-2 through X-7
Refer to Responses to Comments T-2 through T-7 for responses to identical comments.

Charlotte Jones

17816 Highway 67• Ramona, CA 92065
Phone: 760 788 6125 • E-Mail: weetyjones@aol.com

Date: December 18, 2010

Mr. Larry Hofreiter
County of San Diego - Dept. of Planning and Land Use
5201 Ruffin Road, Suite B
San Diego, CA 92198

RECEIVED
DEC 20 2010
DPLU - PPCC

Re: GPA 03-007; SP 03-003; TM 5344; STP 10-007; REZ 07-002; LOG No. 03-09-28; SCH no. 2004031136; Cumming Ranch Project

Dear Mr Hofreiter,

Y-1 I am writing to voice my opposition to the above proposed major subdivision project. I am a close neighbor of the land concerned with my property being within several hundred yards of the boundary of the proposed subdivision. I have a number of main concerns with the project, which I hope to outline in a clear and concise manner below.

Y-2 All of my concerns are rooted in the general nature of the proposed development. The surrounding area is a pleasant mix of agricultural and sparsely situated residential properties, with nearly all of the plots being in excess of 4 acres and a majority being substantially more than that. The proposed development consists of densely packed lots each being an acre and a half or less with a far more suburban nature than the current rural area. This is an area where most residents have horses and chickens, not an area

Y-3 of cul-de-sacs and streetlights.

Y-4 Currently the land in question is open space with a wide variety of native plants and animals living there. It is my personal belief that areas like this are a very important part of what gives Ramona its unique position in the county of San Diego as a true country town within commutable distance of the city. Whilst I understand that progress has to be made and that development of certain areas is inevitable I do not believe that it has to be done at the expense of the heart of a town. The land in

Y-5 question could easily be developed in a manner more sympathetic to the general nature of the surrounding area. It seems wrong to deprive our future generations of a large area of open space with mature live oak trees, hawks, owls and other native wildlife when it could so easily be maintained for their enjoyment with larger plots and more careful planning.

Y-6 As I am sure you are aware the major perennial problem with planned developments in Ramona will always be that of traffic, in particular the Highway 67 corridor. The two major issues with traffic on Highway 67 have been in the past, and will be for the foreseeable future those of congestion and safety. Each weekday large numbers of Ramona residents are caught up in traffic delays on Highway 67. One of

Y-7 the primary causes of delays is the intersection of Highway 67, Highland Valley Road & Dye Road. This intersection would be the main access onto Highway 67 for the residents of the proposed development. Adding the increased traffic associated with an extra 125 households would have a negative impact on the commuting time and thus the quality of life for a large number of residents of Ramona.

Letter Y
Charlotte Jones

Y-1
The introductory statements, overall opposition to the proposed project, and commenter's vicinity to project site are noted.

Y-2
The County of San Diego acknowledges the commenter's description of the project vicinity. This comment does not raise a specific issue regarding the environmental analysis provided in the Project EIR.

Y-3
This comment does not raise a specific issue regarding the environmental analysis provided in the Project EIR. As outlined in the Draft EIR Project Description, page 1-14, the proposed project would allow animal keeping. On page 1-15, the minimal lighting plan for the project is described, which specifically does not include street lights and minimizes private residential lighting.

Y-4
The County of San Diego concurs that a wide variety of plants and wildlife live within and utilize the Cumming Ranch property, as detailed in the Biological Technical Report and EIR, Section 3.1. This comment does not raise a specific issue regarding the environmental analysis provided in the Project EIR.

Y-5
This comment does not raise a specific issue regarding the environmental analysis provided in the Project EIR. While a portion of the property would be developed with residential uses, approximately 67 percent or 457.4 acres of the property would remain as open space. As detailed in the Project Description, page 1-4, the majority of oak trees would not be removed by the development. As detailed on pages 3.1-36 and 3.1-37, a total of 11 Engelmann oak trees and four coast live oak trees would potentially be impacted by the proposed development and would be mitigated at a 2:1 ratio as required by Mitigation Measure M-BI-13 for a total of 22 new Engelmann oaks and 8 coast live oaks. Wildlife would continue to have access to the open space within the proposed project, particularly the large continuous open space areas in the northern portion of the project site.

Y-6
This comment is related to traffic congestion and safety on SR 67 and is addressed in Response to Comment S-2.

Y-7

Traffic information provided in the project Traffic Report and in Section 2.1 of the Project EIR shows that the SR 67 and Highland Valley Road/Dye Road intersection currently operates at an unacceptable level of service E (LOS E), as shown in Table 2.1-3. Traffic generated by the proposed project would travel through this intersection and, as stated in Section 2.1.3 of the Project EIR, the net increase of traffic to the street system during the AM peak hour would be 120 trips and during the PM peak hour would be 150 trips. However, as part of the proposed project and required mitigation, this intersection would be improved. The proposed improvements, as described on pages 1-6 and 1-7, shown in Figure 1-8, and described in Mitigation Measure M-TR-2, would bring operation of the intersection up to an acceptable LOS C, including the project's traffic. Thus, the intersection would operate substantially better than it does currently and at acceptable levels per County standards.

Y-8 Although, more difficult to quantify I also feel that the additional traffic from so many households would have a negative impact on the already poor safety record of Highway 67. I have heard a few times over recent years that before 2005 County Supervisor Dianne Jacob stated that she would not approve any project that would add one more car to Highway 67. No major improvements have been made to the road since then and the appalling accident count continues to worsen. Indeed, according to a recent article in the San Diego Union Tribune there have been 8 deaths and 133 injuries from collisions this year alone.

Y-9 To conclude, I feel that the proposed development is not in keeping with the surrounding area and would have a negative impact on the current residents of Ramona. Although, in an ideal world I would love the land to remain undeveloped, I understand that I have to be realistic and realize that that scenario is improbable. Therefore I can only hope that if the development is approved it is with some major modifications to the current proposal. I would hope that the properties could be less densely

Y-10 situated with larger lots to better reflect the surrounding neighborhood, and that the current landscape could be as well preserved as possible, hopefully keeping a large number of the rock outcrops and mature trees that give the land its natural beauty.

Y-11 If, for any reason at all, you feel that contacting me to discuss and of my concerns would be beneficial I would be more than happy to assist you. I can be contacted by telephone on (760) 788 6125, email at weetyjones@aol.com or, of course, by mail.

I thank you for the time you have taken to read this letter and hope that you will consider my concerns seriously when reviewing the application for the proposed subdivision.

Yours Sincerely,

Charlotte Jones

Copy to:

Supervisor Greg Cox

Supervisor Dianne Jacob

Supervisor Pam Slater-Price

Supervisor Ron Roberts

Supervisor Bill Horn

County Administration Center
1600 Pacific Highway, Room 335
San Diego, CA 02101

Y-8
This comment is related to traffic congestion and safety on SR 67 and is addressed in Response to Comment S-2.

Y-9
Land Use, Section 4.1.4 of the Draft EIR, provides an analysis of the compatibility of the project with the surrounding community, including the adjacent Ramona Town Center and rural residential lots within the vicinity of the project site. While the Cumming Ranch project would introduce a development that is denser than some of the surrounding rural residential lots, the County of San Diego finds the project to be generally compatible with the surrounding area and is consistent with the planned growth for the Ramona community.

Y-10
The commenter's request for less dense, larger lots is noted. The request is acknowledged and is included in the project's Final EIR for the decision makers to consider. No additional response is necessary. However, the project does maintain unique natural features of the project site (hills and drainages) to the greatest extent possible. In addition, the majority of rock outcroppings and mature trees on the project site would remain within open space lots.

Y-11
Closing statement noted and no response is necessary.

-----Original Message-----
From: cosmos@cox.net [mailto:cosmos@cox.net]
Sent: Saturday, December 11, 2010 2:41 PM
To: Hofreiter, Larry
Subject: Information request

Hi Mr. Hofreiter,

1) Could you provide The list of Property Owneres who were notified regarding Cumming Ranch Project, dated November 4th 2010 Notice?

2) What is your job title, exactly?

3) Did Mr. Driscoll provide information to DPLU or the other department in the County regarding sprayfield for the Cumming Ranch?
If so, when?
Z-1 4) Do you know the location where the sewer sprayfields are planned,
5) whether the sewer is to be processed before being sprayed onto the fields,
6) ground water level,
7) flood zones,
8) possible contamination of the aquifer that provides well water to the neighbors,
9) other environmental and traffic concerns due to sprayfield

Could you please e-mail me with response?
I would appreciate your soonest response since the deadline to the public comments is December 20th 2010.

Michiyo Kirkaptrick

Letter Z
Darren and Michiyo Kirkpatrick

Z-1
This comment is directed to County staff regarding a variety of topics and does not address the analysis presented in the Project EIR. No response is necessary. Note that spray fields are not part of the project and therefore are not evaluated in the EIR (see Response to Comment V-3).

From: cosmos@cox.net [mailto:cosmos@cox.net]
Sent: Monday, December 20, 2010 12:30 PM
To: Hofreiter, Larry
Cc: Jacob, Dianne
Subject: Comments on the Proposed Cumming Ranch Project DEIR GPA 03-007; SP 03-005; TM 5344; STP 10-007, REZ 07-002, LOG NO. 03-09-028;

This is an e-mail version of the EIR comments.

Mr. Larry Hofreiter
County of San Diego-Department of Planning and Land Use
5201 Ruffin Road, Ste B,
San Diego, CA 92123

Subject: Comments on the Proposed Cumming Ranch Project DEIR
GPA 03-007; SP 03-005; TM 5344; STP 10-007, REZ 07-002, LOG NO. 03-09-028;
SCH NO. 2004031136

Dear Mr. Hofreiter:

Z-2 After reviewing the draft EIR for the Cumming Ranch Project I have significant concerns and comments regarding the impact that such a proposal could have on the community of Ramona. Specifically the following:

Z-3 1. **Inconsistency in the Rural Community Character** of the West End of Ramona. Existing community character is based on open land, open space, and undeveloped countryside with low density homes. Parcels in the adjacent and nearby surrounding areas are agricultural in nature with ranching, dry-land farming and large animal-raising. Parcels directly adjacent the project south of Highland Valley Road average 3.5 acres; parcels to the west and southwest of Area A, average 4.2 acres; parcels to the northwest of Area A, average 10.7 acres; and the proposed Z-4 2020 General Plan increases the minimum lot size to 10 acres north of Highland Z-5 Valley Road. The Cumming Ranch Project proposal of average 1.5 acre lot size

Z-2
This is an introductory comment and does not specifically address analysis presented in the Project EIR. No response is necessary.

Z-3
This comment provides a description of the community surrounding the Cumming Ranch property. The language of Section 4.1.4 in the Final EIR has been modified to clarify the existing lot sizes of the surrounding properties. Refer to Response to Comment W-2.

Z-4
The project is consistent with the General Plan and the required Conservation Subdivision requirements.

Z-5
The comment is unclear as to which statement on page 3.4-16 of the Draft EIR is considered to be false. It is true that there are residential lots surrounding portions of the project site that are larger in size than some of those proposed in the Cumming Ranch project. However, animal keeping is proposed according to the same zoning regulation ("L") as that found on the surrounding properties. It is not inconsistent to have some lots with large animal keeping and nearby lots that do not, contrary to the commenter's opinion. While the Cumming Ranch project, with lot sizes of 1 to 4 acres, would introduce a development that is denser than some of the surrounding rural residential lots, the project has a rural residential character and is compatible with the surrounding area and is consistent with the planned growth for the Ramona community, as determined in Section 4.1.4 of the Final EIR. Also see Response to Comment T-2 and V-24.

Z-5 cont (suburban-like parcels), mostly devoid of large animals, is in stark contrast to the surrounding rural area and is inconsistent. Therefore, the EIR statement on Page 3.4-16 is false.

Z-6 Also, these smaller lots would not be a reasonable transition to the adjoining properties.
Parcels to the west of Area A in the Cumming Ranch high density housing project has an average lot size of 1.5 acres in this section and is not consistent with adjacent properties (typically over 5 acres lots, some are over 10 acre lots: Assessor's Parcel Map 283-03 Sheet 1 of 2) in which many of them currently have horses. The Cumming Ranch's urban style does not fit in the rural community character for this area.

Z-7 The big developers should not get special treatment to amend the existing General Plan.
Cumming Ranch should abide by the historic standard of this area determined by the General Plan. If it is allowed, it will create a precedent in the future for more developers to amend the General Plan for their own profits. We do not accept this proposed 1-acre minimum lot size.

Z-8 The serene scenery and peaceful quiet environment we have in the west end of Ramona will be irreversibly lost. There is no way to mitigate these qualities once the proposed 125 high-density homes are built. It may be unwise for the Decision
Z-9 Makers to approve another project similar to Montecito project in Ramona until the General Plan 2020 is in place.

Z-10 2. **Congestion of Roadways**: SR-67, from Poway Road to Archie Moore and Highland Valley Road is already deemed Grade F (worst grade possible) by the county. Approving 125 new homes with 1250 additional vehicle trips made each day, in addition to the recently approved Montecito Project of 417 homes with
Z-11 4170 vehicle trips daily, will severely impact an already heavily congested and dangerous roadway. The traffic study data in EIR (2004 and 2007) is outdated.
Z-12 The projected average daily trips (ADT) should include all traffic per household: ten times amount of the number of houses. Also EIR should note more ADT during construction.

Z-13 SR-67 is the primary road in and out of Ramona. The main concern is bumper to

Z-6
As noted above in Response to Comment Z-5, there are residential lots adjacent to portions of the project site that are larger in size than some of those proposed in the Cumming Ranch project, but most of the project is open space adjacent to offsite properties.

Z-7
The County does not provide special treatment for any developer, regardless of project size. The County's General Plan amendment process applies to applicants who wish to go through the proper steps to propose an amendment. The approval of this project would not set a precedent for lot size allowance as all existing lot size requirements outside of the Cumming Ranch property would remain in place and any future development wanting to reduce lot size would be required to go through the County process and be evaluated independently.

Z-8
The proposed project would alter the characteristics of the Cumming Ranch property. However, as found in the Project EIR, the environmental impacts resulting from the project, with the exception of traffic, would be mitigated to less than significant. The commenter is incorrect in stating that the proposed development is high-density. See Response to Comment T-2.

Z-9
This comment is directed to County decision makers regarding the wisdom of approving a privately initiated development project before adoption of the General Plan Update. The County adopted the General Plan Update on August 3, 2011. The comment does not address the analysis presented in the Project EIR. No response is necessary.

Z-10
See Response to Comment S-2. Caltrans has been involved in project review and concurs with proposed mitigation required for this project as indicated in their comment letter in Comment B-3.

Z-11
Recent traffic data collected indicate that the current traffic volume counts are lower than the previous year counts, likely due to the economic climate and the price of gasoline. Caltrans and the County made the decision to require use of the higher, earlier counts, which would be a more normal baseline for the analysis.

Z-12
As detailed in Section 3.1.1 of the Traffic Analysis, the estimated project-generated traffic was based on the appropriate SANDAG trip generation rates. The generation rate used for the project assumed 12 trips per household per day (higher than the 10 times rate suggested in the comment).

The construction traffic volume used in the Traffic Analysis, page 18, was based on average anticipated vehicle trips necessary for construction activities and would vary dependent upon the exact construction activities ongoing. Construction traffic would only occur during the project construction period. The comment does not justify the need to increase construction traffic volumes.

Z-13
See Response S-2. Caltrans has been involved in project review and concurs with proposed mitigation required for this project, as indicated in Comment B-3 in their comment letter.

Z-13 cont

bumper traffic during rush hour both morning and evening, and the prospect of more collisions as drivers exiting Highway to side streets without traffic signals, and merging to Highway from side streets, taking chances passing over center line. The California Department of Transportation Development Review Branch, District 11 Planning Department should review this based on the traffic accidents and mortality records and the proposed future widening of SR-67, addressing the impact on SR-67 that would be caused by future increases in traffic to and from the proposed project, Cumming Ranch, located on Highland Valley Rd intersecting SR-67.

Z-14

There is no plan to upgrade the LOS F-rating on SR-67 between Poway Road & Archie Moore or between Archie Moore & Highland Valley Road. In the last 6 years we have had 2 major wildfires in the Ramona area. Evacuation and returning back to the homes was a major traffic problem with people stuck in their cars for several hours. This is really a PUBLIC SAFETY ISSUE. It is absolutely necessary for EIR to include more current traffic counts and studies. Furthermore, it may be unwise for the Decision Makers to approve this Cumming Ranch project in Ramona until the 2030 Regional Transportation Plan widens SR-67.

Z-15

3. **Loss of Biological Resources and Lack of Mitigation**. The project site is home to a diverse population of native animals, including Mountain Lions, the American badger, Southern Mule Deer, San Diego black-tailed Jackrabbit, bobcats, and numerous native plant species. The hilltops' Coastal Sage Scrub, and grasslands/wetlands of Area A, in addition to the grasslands and riparian habitat of Areas B & C, are known foraging areas for numerous raptors, including the Golden Eagle, Bald Eagle, Red-Shouldered hawk, Ferruginous hawk, Coopers hawks, White-tailed Kites, Turkey Vultures, Red-tailed hawks, Kestrels and owls, to name a few. In fact, Area A was once used as a prime viewing area for the local hawk-watch group. It is preposterous to think that the proposed small islands of "open space" amidst clusters of suburban type dwellings will remain a safe and useful forage and nesting areas to wildlife. Loss of this forage and nesting habitat means the loss of vital biological resources for both the community of Ramona and for the County of San Diego. A multitude of species that thrive in this area are also on the protected list (CDFG State Protected Species and Species of Special Concern).

Z-14

As explained in Response to Comment L-3, the project's traffic mitigation, along with existing agency and community plans for emergency evacuation, avoids potential significant impacts of project traffic on evacuation. The date that the traffic counts were taken was appropriate. According to traffic counts from more recent projects, there was more traffic when the count was taken for this project than more recently. This reduction is presumably due to economic slow-down and the high price of gas. Therefore, no additional traffic counts are required because with lower counts no additional impacts would occur. The comment regarding the timing of consideration of the project will be made available to the decision makers.

Z-15

The comment is noted. The proposed project considers the biological resources listed in the comment in Section 3.1 of the Project EIR as being known to the project site or general area. Section 3.1 of the Project EIR provides detailed analysis regarding wildlife species, including bird and raptor species on the project site and within the surrounding grasslands, and found that potential impacts would be less than significant with appropriate mitigation, including designation of 457.4 acres of the project site (67 percent) as open space. Significant impacts to biological species are identified in the Project EIR and mitigation is provided for those impacts. Mitigation was found to reduce potential impacts to the biological resources to less than significant as detailed in Section 3.1.6. The EIR and Biological Technical Report both detail the special status of each species, including CDFG categories. CDFG has been involved in the project design through the NCCP/HLP Batching Process as indicated in their comment letter, Letter B.

South of Highland Valley Rd, and immediately east of Adrienne Way is approximately 15 acres of green vegetation; including various species of oak trees and native plant communities identified here is what is known as Coastal Sage Scrub. Historically, this 15-acre section has been a part of an undeveloped open space. This natural and undeveloped area has always been green trees, and plants surviving on the water provided by a natural underground water source. In fact, this area is part of the evergreen vegetation area at the west end of Ramona. This
Z-16 stretch of evergreen vegetation area starts from the southern border of Poway up to this east end of Adrienne Way. No other location can replace this dense and unique vegetation because of this exclusive connectivity. The project proposes to eliminate over 15 acres of dense native Coastal Sage Scrub on Area A's hilltop immediately east of Adrienne Way (current proposed parcels #58 through #70). This particular habitat loss cannot be replaced in another area of Ramona because of its exclusive connectivity from this area to the southern border of Poway. Due to this uniquely situated habitat location within Area A, and its biologically sensitive value, loss of habitat cannot be mitigated and lack of mitigation is a problem.

Z-17 Cumming Ranch conceptual site plan Figure 4 (2005 plan) protected this habitat area, parcels #56 through 70 were placed to avoid wildlife habitat more carefully at that time, which was a better plan for this section of habitat. Therefore, why would it not be possible for the current plan to protect this area without loss of habitat?

Z-18 4. **Growth Inducement, Habitat and Waterway Degradation** due to Sewage System. All existing properties in the surrounding community of the west end of Ramona have septic systems. However, inclusion of a sewage system to serve the proposed development clearly paves the way for major development resulting in
Z-19 the blockage of wildlife corridors. Additionally, construction for a sewer connection would occur directly through the heart of the Ramona Grasslands.

Z-20 Consequently, sewage lines will cross sensitive waterways with the potential of sewage spill into the Etcheverry and Santa Maria drainage systems, and through a well-known major floodplain. This water not only feeds the aquifers & wells of surrounding properties downstream, but also flows into Lake Hodges.

Z-16
The commenter does not provide a factual basis for the statement that coastal sage scrub is located in the southwestern corner of the property south of Highland Valley Road, and the County approved biologist for the project has determined that this habitat is classified as granitic southern mixed chaparral, as shown in Figure 3.1-1b of the Project EIR. The statement that this habitat loss cannot be replaced because of its connectivity to the southern border of Poway is also incorrect because the connection of this vegetation to other natural areas is interrupted by existing residential development along roads such as Adrian Way to the west, and development along roads branching off of SR 67 to the south. Mitigation for all habitat types at the appropriate ratios has been required of the project as detailed in Section 3.1-5 of the Project EIR.

Z-17
The commenter refers to an early draft or concept of the project. Project design and lot layout have taken into account many factors, including but not limited to, protection of biological resources. All habitat loss is adequately mitigated and found to be less than significant. The project and project alternatives were analyzed, and the comment does not address these designs. The comment does not raise an issue regarding the adequacy of the Project EIR and no additional response is necessary.

Z-18
Growth-inducing Effects, Section 1.7 of the Project EIR, provides the analysis of the potential for the sewer expansion into the project site to result in or facilitate additional growth. The analysis accounts for the offsite infrastructure into the adjacent Hardy Ranch as well as the Spirit of Joy church project. The analysis found that the project would not create growth-inducing impacts or facilitate additional development due to the proposed sewer expansion or other means. Should additional projects in the area propose new sewer service, the decision makers would be required to determine the significance of impacts to the important wildlife corridors and for other issues.

Z-19
One mainline sewer to the Mount Woodson area currently crosses the Ramona Grasslands in the applicant's property and the proposed sewer line would be adjacent to the existing line. Once constructed, the sewer line would be underground and the temporarily disturbed surface vegetation would be returned to pre-construction condition. There would be no adverse impact to wildlife movement in the surrounding grasslands.

Z-20

The comment states that the project will increase the number of sewage lines crossing the sensitive areas of Santa Maria and Etcheverry Creeks and thereby will increase the potential for sewage spills. Grading and Improvement Plans will require that sewer mains be constructed using the latest technology and materials. The sewer line watercourse crossing will be engineered to a sufficient depth to mitigate for potential degradation and scour by flood flows. The sewer alignment avoids floodway zones where feasible and makes only one crossing of Etcheverry Creek and no crossings of Santa Maria Creek. Therefore there is no perceptible increase in risk for sewage contamination.

Z-21

5. **Sprayfields Impacts.**
Ramona Sentinel newspaper (December 2, 2010) headline states: "Sprayfields needed for 125 new homes, district tells county"—The EIR has not identified any sprayfields as part of the Cumming Ranch project, so the potential environmental impacts of sprayfields have not been evaluated. Where is the location of sprayfields? How many tens of thousands of gallons of treated wastewater will fall on a sprayfield? The wastewater from 125 residential dwelling units will make acres of land constantly wet. Until the study is evaluated and the results show there is no hazardous and adverse impact to humans and animals, the project should be temporally halted.

Z-22

6. **Noise Nuisance** due to insufficient setback. In the proposed site plan, parcels #40 through #52, and #62 through #67 are too close to the existing properties of the surrounding community. The clusters of housing too close to the neighboring property lines will create a public nuisance to surrounding properties, including; noise, vibration, traffic or other disturbances. Noise pollution may cause serious harm to both man and the environment. The study must be provided for the potential damage caused by noise pollution to human and other living species.

Z-23

7. **Light Pollution.**
Proposed area is extremely peaceful and quiet and an important aesthetic resource at night. Living in a low density area provides the dark night sky. For the property owners, the dark starry night sky is a choice and a vital part of their enjoyment and mental health. The qualities of low-density housing area and the dark sky should be preserved. The area shall remain low density to preserve its rural character. The proposed 125 high density houses are out of character with the existing community and incompatible. The clustered houses will emanate light and ruin the darkness of starry sky. Light pollution can have serious repercussions, such as disturbing ecosystems and provoking diseases in humans. The EIR fails to include impact of Light Pollution. The study of the impact of this everyday light pollution in this proposed site on human health and other living species and their long term effects must be conducted.

Z-24

8. **Negative Aesthetic Impact** at the Entrance of Ramona.

Z-21
See Response to Comment V-3.

Z-22
The EIR includes a noise analysis that demonstrates the project's consistency with the County of San Diego Noise Element and the Noise Ordinance. Future nuisance noise in residential developments is determined based on complaints. However, noise generated by residential use would be similar in nature to noise that already occurs due to surrounding residential areas. Offsite traffic noise generated by the project was evaluated in the Noise Analysis and summarized on pages 3.3-8 and 3.3-9 of the Draft EIR. The Noise Analysis found less than significant noise impact due to implementation of the proposed project.

Z-23
Light pollution is addressed in Section 3.4 the Project EIR as well as the Visual Resource Assessment prepared for the project, Appendix G to the EIR. As stated on pages 3.4-12 and 3.4-14 of the Draft EIR, the project does not propose street lighting with only minimal lighting at each of the four project entrances from Highland Valley Road for safety purposes. Light sources from individual homes would be minimal and subject to the San Diego County Light Pollution Code. Page 1-15 of the Draft EIR describes requirements for residential lighting including the use of shutoff timers, motion lights, and downshielding. No significant impact resulting from light and glare was identified.

Z-24
The commenter indicates that the project site is at the entrance into Ramona and that the project would contradict the equestrian and open nature of Ramona. The commenter is incorrect in stating that the project is 125 one-acre lots; in fact, the lots are 1 to 3 acres and designed in a manner to avoid significant resources on the 682-acre property.

The Project EIR found visual impacts from the proposed project to motorists on SR 67 as they enter the Ramona community were less than significant. Views from SR 67 were considered in Key Views 1 and 2 as described in Section 3.4 of the EIR and shown in the visual simulations provided in Figures 3.4-3 and 3.4-4. The project has been designed with large open space lots (Lots A and B) between SR 67 and planned development that would minimize the future view of residences from the roadway. Physical features onsite, such as trees, boulders, etc. are incorporated into open space lots or outside of the impacted areas (graded pads and driveways) of the residential lots' design. All of the major ridgelines, larger groups of rock outcroppings, heavily wooded areas, and major drainage areas on the property would be preserved and included within open space areas. The use of native plantings within the landscape plan is intended to

allow the project to integrate more seamlessly with the adjoining preserve areas. These and other features of the design further reduce the visual impacts of the project, and views of the onsite scenic vistas from SR 67 would be maintained. Additional visual buffering from SR 67 occurs from the drainage between SR 67 and the area of development south of Highland Valley Road.

Z-24 Cont

The entrance into Ramona is officially designated at the SR-67 – Highland Valley Road interchange with a hand-crafted metal welcome sign displaying the representatives of Ramona: horses, raptors and mountains. This area is rural and equestrian in nature. The most scenic views in Ramona are of the hills, valleys and open spaces. These visual qualities should be preserved. The area should remain non-industrial and low-density to preserve its rural character. The community spirit should be maintained through careful development of the remaining parcels into residences similar in character to the existing ranches and custom homes that promote unity.

Z-25

However, the placement of 125 one-acre residential lots when approaching this entrance sign would contradict the historically equestrian nature and expansive openness that is Ramona. These 125 high density homes would not represent the County's designation of SR-67 as a "Scenic Highway." The issue is the aesthetic impact that the proposed housing development will have on a historic wilderness landscape. Additionally, the applicant proposes development of single-family homes

Z-26

that will NOT possess characteristics similar to the surrounding neighborhoods. This development causes a significant, negative aesthetic effect due to the placement of 125 single family residential units on approximately 682.2 acres of what is currently undeveloped, open space.

Z-27

Since the proposed development is situated at such an important location — the heart of Ramona, an accurate assessment of the aesthetic impact of a proposed 125 housing development should be conducted. The photographs included in EIR of before-and-after simulations severely lack the true image impacted by the houses (Figure 3.4-3 through 3.4-7). The photos emphasize the road, downplaying the impact of the houses. Further, these photographs were taken from such a distance and from particular angles. They do not accurately represent the number of houses that should be in view. Only two small houses are presented in the simulation images. The simulation images are misleading. Because the terrain of the proposed site is not flat, the two dimensional photo simulation is not adequate. The EIR is incomplete and inadequate. In order to portray a more accurate visual impact of the house tract to the viewers, a computer-assisted 3d images of all the houses and surrounding scenic panorama in a visually cohesive manner from all angles, should be provided in the EIR.

Z-25
The local designation of SR 67 as a scenic highway is discussed on page 3.4-3 of the Draft EIR and considered throughout the visual analysis. See Response to Comment Z-23 above regarding views of the proposed project site from SR 67.

Z-26
The statement that development on 682 acres of undeveloped land would change the visual environment of the property and introduce residential features to a site that was previously undeveloped is true. However, as explained in Response to Comment Z-24, the impacts have been determined to be less than significant by placement of the residences in a manner not to obstruct important (key) views and with mitigation for noise buffering barriers.

Z-27
The commenter believes the visual simulations are misleading. As described on page 39 of the Visual Resources Assessment, the simulations were prepared with an accurate digital simulation of the future development conditions. The simulations are not generalized artist renditions. The simulations were created through photographing the project site with high resolution digital photography. The exact distances from the camera to points on the project site were recorded through the use of global positioning system (GPS) technology in order to achieve accuracy in the scale of future development. Computer imagery was then developed from details shown on the TM in order to place future homes in the appropriate locations and to ensure accurate scale in the photos. Since development of the visual simulations, the project design has been slightly modified. Most of the modifications to the project design would not be noticeable in the simulations; however, there are certain views where the lot layouts would appear slightly different than presented in the simulations. These differences are noted in the analysis text and the photo simulations. The simulated homes in the photos are generalized representations of the anticipated design of the future residential construction and are not meant to define the exact look of the individual homes on each lot. The analysis uses key views and associated simulations to best represent the majority of viewers. The photographs do not attempt to minimize the site or views, but rather show an accurate representation.

9. **Erosion, Flooding, Soil Contamination, Climate Change.**

As mentioned in item 3, south of Highland Valley Rd., and immediately east of Adrienne Way is approximately 15 acres of green vegetation; including various species of oak trees and native plant communities identified here is what is known as Coastal Sage Scrub. Historically, this 15-acre section has been a part of an undeveloped open space. This natural and undeveloped area has always been green trees, and plants surviving on the water provided by a natural underground water source. In fact, this area is part of the evergreen native vegetation area at the west end of Ramona. This stretch of evergreen vegetation starts from the southern border of Poway up to this east end of Adrienne Way. Z-28

Also the 15 acres of native evergreen vegetation acts as a buffer to absorb overflow, reducing runoff and filtering excessive pollutants from surface and groundwater sources that naturally help the surrounding rural community. However, the proposed parcels # 60 through 75 will eliminate this Coastal Sage Scrub and hundreds of deep rooted oak trees that inhabit this area. Adrienne Way is a hill and the15 acres of vegetation sits at the highest point of this area. The topography shows that the land slopes down toward the eastern direction and becomes a wetland. Any drastic reduction of native vegetation, soil taken from the land by grading, soil contamination, artificial conveyances-gutters, storm pipes altering the drainage patterns, can cause artificial grooves as a result of urbanization and can upset the natural balance maintained in the area.

Z-29 This will put this unique area at risk. If the proposed project is allowed, 682.6 acres of historic open space suddenly becomes covered with concrete, asphalt, and other construction material. Also, because this current plan does not consider Z-30 a No Build Alternative or Reduced Project Alternative, which are both considered environmentally superior alternatives, Cumming Ranch fails to meet the San Diego Z-31 County Draft General Plan's major strategy in its policies in the Land Use, Conservation and Open Space, and climate change: i.e., "Maximize preservation of open spaces, natural areas, and agricultural lands." There are multiple concerns here such as: erosion, flooding, loss of cleaner underground water, and climate Z-32 change. The EIR is incomplete. Only an assumption of short-term water pollution is described without data. (Page 4-10) The detailed study of short-term impacts and its definition of "short term" should be included in the EIR.

Z-28

Please see Response to Comment Z-16 regarding the habitat type in the area referenced in this comment. Section 4.1.1 of the Project EIR and Response to Comment V-8 provide details regarding the project requirements to avoid hydrologic changes with implementation of the County of San Diego Standard Urban Stormwater Mitigation Plan (SUSMP) requirements and Low Impact Development (LID) standards. The commenter is incorrect about the hydrological impacts from lots 60 through 75. Even though the existing vegetation buffers rain runoff in the pre-construction condition, the post construction condition will be engineered to manage storm runoff with BMPs (vegetated swales and permeable paving) at the source and prior to leaving the project site. Note that the project retains most of the native oak trees through implementation of the goals of the Specific Plan.

Z-29

The comment does not have a factual basis because the project will not result in "682.4 acres of historic open space... suddenly becomes covered with concrete, asphalt." The project would develop 125 single-family homes with hydromodification management on 215 acres (32 percent of the property), 9.8 acres with ROW roadway improvements (1 percent of property), and maintain 457 acres (67 percent of the property) as open space.

Storm water treatment for the project requires Low Impact Development (LID) standards to be implemented. The project's LID design will ensure onsite treatment through dispersal of runoff to landscaped areas, filters, settling ponds, pervious pavements, bioretention facilities, flow-through planters, dry wells, infiltration basins, constructed wetlands, and/or cisterns. Where feasible and where allowed, water in cisterns may be directed to non-potable uses, augmenting water supplies. Runoff peak-and-duration-control (hydromodification management) will also be employed to simulate pre-project and post-project runoff, and mimic pre-construction conditions with the effect of LID facilities, detention basins, or other storm water management facilities.

Z-30

The comment does not have a factual basis because the Project EIR does consider the No Project Alternative (Section 5.2) and the Reduced Project Alternative (Section 5.5). The Reduced Project Alternative is considered to be the environmentally superior alternative. However, as detailed in Section 5.5-3, the Reduced Project Alternative is not preferred over the proposed project.

Z-31

The Cumming Ranch project complies with the General Plan update that was adopted on August 3, 2011. The major strategy quoted in the comment relates to climate change (Strategy A-7: Maximize preservation of open spaces, natural

areas, and agricultural lands). On page 1-5 of the General Plan text, an explanation regarding the application of such policies is presented, “a policy to conserve open space is not a mandate for preservation of 100 percent of the existing undeveloped land in the County. It must be balanced with other policies that allow development and other uses of the land. Implementation of the policy in new developments will be achieved through regulations such as the Resource Protection Ordinance, Biological Mitigation Ordinance, and California Environmental Quality Act, which will guide to what degree open space lands must be conserved.” The project has demonstrated a balance and achieves the strategies and goals of the General Plan.

Z-32

The issues listed in this comment are addressed in the Project EIR as follows: erosion in Section 4.1.1 Hydrology and Water Quality and Section 4.1.8 Air Quality, flooding and groundwater in Section 4.1.1 Hydrology and Water Quality, and climate change in Section 3.5. Unless noted, no differentiation is made between short-term and long-term impacts. Where an issue area has a potential for short-term impacts to result, such as construction impacts, the impacts are identified and fully mitigated. Short-term impacts are described individually for each issue area as necessary because one definition of “short term” does not universally apply to different types of impacts.

10. **Blocking Scenic Views; Increasing Traffic Views.**

Z-33 The proposed parcels #40 through #52, and #62 through #67 will impact the views experienced by the existing one-story single family residences located directly south and southwest of the project site. The single story homes of existing residences currently maintain views to the north of the vacant project site out to Cranes Peak and Orosco Ridge. Many of the residents are able to see northeast of the site to the mountain ranges of Middle Ridge, Black Mountain, Gem Hill, Corral Mountain, Angel Mountain, Whale mountain and Witch Creek Mountain. The elevations of the proposed site vary and subject to grading adjacent to the existing residences. The project proposes grading in order to remediate existing on-site soils through the removal and the placement of additional fill dirt on-site. Grading will result in on-site landform grade elevation increases. This increase combined with construction of residential units could block existing scenic views experienced by the residents adjacent to the proposed site.

Z-34 Due to the conversion of what is currently vacant land to residential tract land use, this will totally change the view. The view will include vehicles driving on additional residential roads within the proposed project, in addition to a view of constantly flowing vehicles and congestion along Highland Valley Rd. to and from the proposed site. According to SANDAG, 10 trips per dwelling unit per day for a single family detatched household; therefore, minimum of 1250 trips per day for the proposed Cumming Ranch.

Z-35 Therefore, the proposed project will affect current residences by blocking existing views of calm and peaceful open space, instead, it will increase the view of busy traffic of vehicles. The EIR fails to address this scenic sight loss experienced by the surrounding neighbors. In considering blockage, what is the height of the

Z-36 proposed residential units within the Zoning and Subdivision Ordinance? And which parcels are planned as two-story houses? The proposed plan should take into account one-story houses rather than two-story houses in consideration of the adjacent residences to minimize scenic blockage.

11. **Loss of Sensitive Prehistoric Cultural Resources.**

Z-37 According to Chapter 3.0/3.2 Cultural Resources 3.2.3 Analysis of Project Effects and Determination of Significant Impact, page 3.2.5 states "Because of the cultural sensitivity throughout the project site, the potential to directly impact unknown

Z-33

Placement of homes on the Cumming Ranch project will result in changes to the visual setting for some adjacent residences, but these changes are less than significant. The grading plan proposed for the Cumming Ranch project, as described on pages 1-4 and 1-5, includes the minimal amount of grading necessary to create level building pads for residential structures. The pads would be designed to blend into the terrain minimizing tracings of pads and retaining contours that complement natural land forms. Minimal grading techniques would be utilized to design a natural appearing landscape. The project would not create elevated pads; rather, adequately level building pads would be placed within the natural contours of each lot. As stated on page 1-5, the estimated grading would be 170,000 cubic yards of balanced cut and fill. Balanced cut and fill means that the soil would be moved throughout the site and new soil from offsite would not be necessary for pad leveling, as indicated by the comment. Where feasible, the cut and fill would be balanced within each lot.

Furthermore, only about 25 lots have unobstructed private views of the proposed development. These are located along Voorhes and Boortz Lanes, and taking access from SR 67 and Highland Valley Road, and most have views from back yards. Key visual features, such as ridgelines and stands of trees, have been preserved in open space or by the site plan's building restricted areas. Therefore, the most important visual features of the rural, open, and natural aesthetic environment are maintained. With the project proposing minimal land form alteration, a minimum lot size of 1 acre, which allows space for a residence and potential animal or agricultural uses; designation of restricted building areas to preserve significant features within lots; and inclusion of open space lots that preserve the drainages and the hills, residential views would have a less than significant visual change because the change would be in character with the existing rural views in the vicinity.

Z-34

The future aesthetic of the project area roads would include additional vehicles due to traffic generated by the proposed project. However, additional traffic from the project would have a less than significant aesthetic impact given the existing traffic in the area in an overcrowded condition. In other words, the addition of more vehicles is not out of character with the existing visual environment that already includes crowded roads and traffic. Vehicles on new project roads may be aesthetically unpleasing to the commenter but not necessarily to others. The traffic mitigation measures are also typical of improvements that already exist in the community and therefore have less than significant visual impacts.

Z-35

The commenter is incorrect as explained in Responses to Comments Z-33 and Z-34 regarding the project's impact to visual resources and views.

Z-36

The proposed project does not specify a type of home that must be built, but the specific plan zoning applies an S88 Rural Residential zone with a “C” building type, which allows a single-family detached building type and a height designator “G”, which permits two stories and a 35-footheight limitation. Residential structure design would be determined by the individual developer/and or homeowner of each lot, within the limits of the rural residential zoning restrictions and the Community Design Guidelines specified in Section 4.6.2 of the Cumming Ranch Specific Plan. Because the lot sizes are 1 acre or greater, it is anticipated that many homes would be single-story ranch-style homes, as there is ample space for each lot.

Z-37

The comment is correct that a significant impact (Impact CR-1) was identified due to the potential for unknown cultural resources to be discovered during ground-disturbing activities. This potential was considered significant because of the cultural resources known to the area. To reduce this impact to less than significant, Mitigation Measure M-CR-1 would require cultural resources monitors (both archaeological monitor and Native American monitor) to be onsite during all ground-disturbing activities and protocol to be implemented if cultural resources are discovered.

cultural resources during ground-disturbing activities is a potentially significant impact per Guideline 1 (Impact CR-1)"

The discrepancies are as follows:

Z-38 (1) The EIR Table 3.2-3, Cumulative Project List for Cultural Resources, page 3.2-26, number 33 Cumming Ranch, number of lots 136 is an error.

Z-39 (2) Significance: "To be determined by testing" – When will the testing be completed?

Z-40 (3)Mitigation: "Sites on OSE will not be tested." – Why are the sites on OSE (Open Space Easement) not tested ?

Z-41 (4) Native American Consultation: (page 45) "Cumming Ranch area is a sensitive area to the Band (San Pasqual Band of Mission Indians) and that they would prefer to see the property preserved as it is." and the consultation is ongoing. Only 8

Z-42 cultural resource sites (including the sites human bones were discovered) are preserved out of 22 cultural resource sites found in Area A.

Z-43 The EIR is incomplete and is lacking in more comprehensive information as to how to adequately excavate and record the bedrock and boulders with milling that will be lost during grading and construction. The potential impact of the project site including OSE is significant; therefore as much data as possible should be included in the EIR.

-Conclusion-

No Build Alternative should be seriously considered because of its significant, irreversible environmental impact if the Cumming Ranch development is allowed to continue with their project. No Build Alternative is the most suitable for this location.

Z-44

No Build Alternative will provide tremendous advantages over other alternatives. Environmental, the land will continuously contribute the following: clean air, clean water, a dark starry sky, which Ramona is famous for, beautiful aesthetic visual quality, peaceful quiet atmosphere, habitats for endangered and sensitive species-both animals and plants, and finally the protection of prehistoric cultural resources.

Z-38
The comment is noted. Table 3.2-3 lists an incorrect number of lots for the Cumming Ranch project. This table was generated prior to the removal of 11 lots from the project design to the currently proposed 125 lots. Table 3.2-3 has been revised to reflect the correct number of lots. This error does not affect or alter the analysis or conclusions.

Z-39
All testing of the cultural resource sites within the Cumming Ranch area of potential effects (APE) has been completed and is fully detailed in the Cultural Resources Evaluation (Appendix E to the EIR).

Z-40
Sites within designated open space were not tested because no development beyond the agricultural activities now occurring would be allowed. The cultural resources within these areas would not be impacted by the project and are within the open space with monitoring in perpetuity under a Resource Management Plan. Testing is not required for sites that will be preserved and monitored.

Z-41
The Native American tribes' concern with protection of cultural resources is voiced through consultation with the County in accordance with State law (SB 18). Within the regulatory setting, the County and the tribes determine the appropriate solutions for discovered resources. For the Cumming Ranch project, potential unidentified resources are mitigated by a condition that requires a grading monitoring program that includes Native American monitors. In addition, the tribes are notified of public hearings affecting their cultural resources and their participation is encouraged.

Z-42
It is correct that not all cultural resource sites will be preserved within open space. Scientific testing and evaluation of the cultural resources within the APE have identified several sites as significant under the criteria of the County Resource Protection Ordinance (RPO). These sites will be preserved in open space. Testing has also shown other sites within the APE to be significant pursuant to CEQA Section 15064.5(c). These sites will be subject to an intense data recovery program prior to project grading. Other sites have been evaluated for significance with the resulting determination that the research potential of these sites has been exhausted by testing, mapping, collection of artifacts, and permanent recordation. In these cases, no further mitigation is required and preservation is not included. As detailed in Table 3.2-2 of the Project EIR, 28 sites within the development area had the potential to be directly or indirectly impacted by construction of the project. As shown in the table, many of these sites are preserved within permanent open space. Only four sites were

determined to be significant and potentially impacted (Impacts CR-2 through CR-5). Mitigation provides for the preservation, data recovery, and other appropriate means of identifying and preserving sites as required by Mitigation Measures M-CR-2 through M-CR-5.

Z-43

The County disagrees that the Project EIR is incomplete regarding cultural resources. All sites in the project footprint, including those with bedrock and boulders with milling features, have been thoroughly surveyed, tested, and recorded. The Project EIR requires that all ground-disturbing activities be monitored; thus, any unknown resources that may be discovered during construction would be properly identified and evaluated for significance. As detailed in Mitigation Measures M-CR-2, -3, and -5, significant cultural resource sites that are in proximity to project activities would be fenced and monitored to ensure that no disturbance would occur. In addition, the resources within open space will be preserved and monitored so that no disturbance of the sites would take place. The EIR appropriately summarizes the extensive technical information provided in the Cultural Resources Evaluation (Appendix E to the EIR). Please see Appendix E for additional data.

Z-44

The statement is an opinion and will be included in the project's Final EIR for the decision makers to consider. The No Build Alterative is fully described and analyzed in the Project EIR in Section 5.2.

Z-45 Our neighboring citizens oppose the Cumming Ranch project because of the following reasons, which summarize the real residents' voice of Ramona:
• Incompatible Urban development in a Rural area damages the Community Character of the surrounding neighborhoods.
• One of the primary reasons we chose Ramona was because of the low-density rural quality. Cumming Ranch has no right to rob us of our enjoyment and quality of life.

Z-46 To cite Chris Basilevac, "Because of its size, quality and location, Cumming Ranch will play an important part of the reserve of the County's MSCP –Multiple Species Conservation Program." (Chris Basilevac: Senior Project Director, California South Coast and Deserts Region, the Nature Conservancy)

Z-47 For the sake of Ramona's future, the Cumming Ranch site should be made available to the Nature Conservancy or a part of the Ramona Grassland Preserve. Ramona is not like other city's vacant lot. The land along Highland Valley contains important biological and cultural resources and irreplaceable natural values — earth's gift to Ramona. But once this is destroyed, it will be gone forever, replaced by hundreds of houses. The damage done by the developer is irreversible for future generations of all the natural resources, species and habitat. Mitigation is not a fix. Mitigation is merely man's excuse to forget about the damage.

Z-48 It is not about the developer's right to do whatever he wishes; this is not about the profit he will make, or how much money the County gets in taxes. It is about the larger picture. It is about the balance between nature and man and keeping the heart of Ramona undisturbed as much as possible. As current residents of Ramona who are interested in protecting nature and land, we want to preserve an extraordinary place to live. This is an important obligation not only for us, but for everyone.

Z-49 No Build Alternative is the most suitable for this location;
however, if the project proponent prioritizes his commercial benefit over global environmental benefit, then Reduced Project Alternative is more suitable than the current proposal. For the **Reduced Project Alternative**, as neighboring residents, the conditions of approval are as follows:

Z-45
The statement is an opinion and will be included in the project's Final EIR for the decision makers to consider. Please see Responses to Comments Z-5 and Z-6 regarding community character analysis.

Z-46
The quote does not address the adequacy of the Project EIR and no response is necessary.

Z-47
The statement is an opinion and will be included in the project's Final EIR for the decision makers to consider. The Cumming Ranch project includes a total of 457.4 acres (67 percent of the property) of open space for inclusion in the Ramona Grasslands Preserve. The comment does not address the adequacy of the Project EIR and no response is necessary.

Z-48
The statement an opinion and does not address the adequacy of the Project EIR. The statement is included in the project's Final EIR for the decision makers to consider.

Z-49
County decision makers will consider all potential alternatives to the project and the commenter's Conditions of Approval requests are noted. The Reduced Project Alterative is fully described and analyzed in the Project EIR in Section 5.5.

Z-49 cont

Conditions of Approval:

1) The Cumming Ranch lot size should be 4 acre minimum in order to maintain a reasonable transition to the adjoining properties, and to be consistent with rural community character.
All lots shall accommodate a septic system.

2) Reduce the number of houses thereby reducing light pollution.

3) The biologically sensitive habitat loss should be zero acres. This means that the housing area should be planned to avoid damage to such biologically valuable locations such as Coastal Sage Scrub wildlife habitat. As opposed to the conventional proposed plan, the Green Infrastructure (Benedict & McMahon, 2002) could be used to preserve the rural character and to protect natural resources, at the same time, providing efficient land use strategies and development patterns that support social and economic needs of the community. This can be a win-win situation.

4) To minimize biologically sensitive habitat loss and maintain a reasonable transition to the adjoining properties, the rear yard setbacks for the proposed homes (current proposed parcel #40 through #52, and #62 through #67) adjacent to the existing homes should be at least 100 feet minimum.

5) Trees should be spaced and planted every 10 feet along the property line inside the Cumming Ranch property in order to block the invasion of so many new residences and also the light pollution caused by the incursion of so many houses, as well as buffer the noise accompanied with clustered housing (the property line along current proposed parcels #40 through #52, and #62 through #67). A combination of the fast growing California native trees that grow at least 30' tall, including Cottonwood (Populus Fremontii) and Elderberry (Sambucus mexicana) and Valley Oak (Quercus lobata) are specifically requested. The first 5 years must be on an irrigation system until established, preferably starting with a 5 gallons or larger, and 6 feet or taller to start. Cumming Ranch's CC&R and/or HOA rules should clearly state that the trees shall be permanently protected so residents of Cumming Ranch will not intentionally or accidently cut down, eliminate, or replace them for other types of trees.

Sincerely,

Darren & Michiyo Kirkpatrick
17824 Hwy 67, Ramona, CA 92065

Hard copy of this EIR comments with neighboring residents' signatures are to be delivered to your office today.

---

cc: Dianne Jacob
District 2, County Board of Supervisor

From: Paul Lachut [mailto:Paul@ptp.sdcoxmail.com]
Sent: Monday, December 20, 2010 12:28 PM
To: Hofreiter, Larry
Subject: Proposed Cumming Ranch Project

RE; Comments on the Proposed Cumming Ranch Project DEIR
GPA 03-007:SP 03-005:TM 5344:STP 10-007, REZ 07-002, LOG NO. 03-09-028
SCH NO.2004031136

Sir:

My name is Paul Lachut our family resides at 16276 Boortz Ln. Ramona Parcel # 283 031 47 00

AA-1 This project would touch my property along my eastern border for over 600'. As such my concerns are to the deteriation in my quality of life.

AA-2 I oppose the current layout as it allows a greater density / less area per house lot. Why is this development not held to the historic lot size?

AA-3 I have personally observed through out the years of my residence a thriving native and migratory bird sanctuary along my Eastern border in what is now open land.

AA-4 We have and maintain horses on our property as do most of our neighbors this plan reminds me of the development in Poway which was one of the primary reasons we relocated to Ramona over 25 years ago.

AA-5 Another undeniable effect this proposed project would have is adversely impacting traffic on SR 67 again I have first hand experience with this dangerous stretch of highway. I have seen multiple crashes some fatal in this very area we are discussing .To allow any development to go forward with out upgrading the highway is grossly irresponsible and should not be allowed the county has CHP and CALTRANS reports of the accidents in this area. I have first hand knoll age I have seen with mt own eyes the devastation caused by an under developed over crowded roadway. I can not understand how any of our elected officials can turn a blind eye to the fact that this area is a virtual killing field for motorists. And approve a plan that would add to the dangerous existing conditions

AA-6 In conclusion I believe in development when it is well thought out and addresses and maintains the theme of the area. The current documentation I have reviewed I can not support.

Thank you,

Paul Lachut

Letter AA
Paul Lachut

AA-1
Comment AA-1 describes the commenter's property location adjacent to the proposed project on Boortz Lane and concern for quality of life. The comment does not address the adequacy of the Project EIR. No response is necessary.

AA-2
The commenter opposes the project layout. However, it is not correct that the proposed lot density is more than that allowed by the Cumming Ranch SPA per the Ramona Community Plan. The size of the proposed lots is smaller than established in the Ramona Community Plan but the density of the project would be substantially less than is currently allowed, because it proposes large areas of open space. The proposed project no longer includes a General Plan Amendment. The preservation of Areas A and Area B and open space areas throughout Area A necessitates a smaller lot size to avoid the sensitive resources on the property.

AA-3
The comment addresses the general subject area of native and migratory birds on the project site, which was discussed in Section 3.1 of the Project EIR and in the Biological Technical Report prepared for the project (Appendix B of the EIR). The comment does not raise any specific issues regarding the EIR analysis; therefore, no more specific response can be provided or is required.

AA-4
Comment AA-1 describes the commenter's large animal-keeping activities. The comment does not address the adequacy of the Project EIR. No response is necessary.

AA-5
The commenter provides a personal accounting of SR 67. Traffic generated by the Cumming Ranch project would add additional traffic volume to this roadway but would not impact traffic safety. Please refer to Response to Comment S-2. The commenter's opinion is acknowledged and will be included in the project record for review and consideration by the decision makers.

AA-6
The commenter's opposition to the proposed project is noted. Please refer to Responses to Comment s Z-5 and Z-6 regarding the project's community character analysis.

From: Ben [mailto:zwineguy@gmail.com]
Sent: Sunday, December 19, 2010 8:18 PM
To: Hofreiter, Larry
Cc: Jacob, Dianne; iloveramona@yahoo.com
Subject: Comments on the Proposed Cumming Ranch Project DEIR GPA 03-007; SP 03-005; TM 5344; STP 10-007, REZ 07-002, LOG NO. 03-09-028; SCH NO. 2004031136

Dear Ma'am and Sir:

BB-1 As an extremely interested and concerned citizen living and working in Ramona I feel I must contact you with my comments and observations regarding the proposed Cumming Ranch Project (CRP).

BB-2 First, permitting development in an area where there already exists a dangerous and often deadly traffic problem, re: Highway 67, is irresponsible. The county and state MUST address and correct the existing issue even before rational planning for expansion and development of this area.

BB-3 Second, and much more importantly, there exists a balance of nature, natural preserve and human encroachment. I recently had the opportunity to witness a golden eagle roosting in a tree in the "back yard" of my friend's house while house-sitting. His property (on a private road off highway 67, northeast of Highland Valley Rd) also is directly adjacent to the proposed CRP. I came out to the back at 7:15 in the morning on November 23rd and saw a large bird in the tree directly behind the fence of his property. I took a photo with my phone but was a bit far away, so while moving around the grapevines the eagle took flight. So majestic, so powerful... I cannot spread my arms as far as his wingspan. He flapped his wings twice and soared out across the valley. I was so moved that I constantly relay this story to all my fellow Ramonans and all are enthralled and understanding of the responsibilty we have to maintain this area for the wildlife. I know intellectually and also feel emotionally that if the CRP proceeds, that scene and so many like it will be lost. Housing and development will disrupt these patterns and destroy the area for wildlife.

How much farther must we push the wildlife? How much more pressure can we put on our natural local resources? Is it always about divide and sell? One-acre lots will burden the area and the resources to the point of corruption. This natural preserve will be lost. I feel that even 4-acre lots may be too dense as well. I live on a property that is actually three lots combined to over 6 acres. The original subdivision was due to inheritance and not development. In this way, we try to maintain the country living atmosphere and limit the influence on the environment and natural resources.

BB-4 I urge you to stop the project. Use your heads and do what is right as responsible humans in charge of an area of an already taxed planet. Do not ignore the constituency in favor of deep-pocket developers. Do not ignore your duty to preserve what is good and right with our county.

Thank you and sincerely,

James Maurer

Letter BB
James Maurer

BB-1
This comment is an introductory statement and does not address the analysis presented in the Project EIR. No response is necessary.

BB-2
As detailed in Response to Comment S-2, the project would not cause traffic safety impacts on SR 67. As detailed in Section 2.1.6 of the Draft EIR, mitigation would improve traffic operating conditions over current conditions, improving traffic flow and traffic safety. Caltrans has been involved in project review and concurs with proposed mitigation required for this project as indicated in their comment letter (Letter C). In addition, project mitigation required prior to occupation of the project, such as improvements to the SR 67 and Highland Valley Road intersection, would serve to improve traffic operating conditions along the roadway by reducing queue times at the signal and providing more appropriate turn lanes; see Response to Comment G-2. The comment correctly states that the addition of traffic to SR 67 is an unmitigable impact. However, specific mitigation has been identified to lessen the impacts of project-related traffic, even if underlying traffic impacts remain significant. See Response to Comment L-2.

As stated in Section 2.1.6, the Draft EIR found that traffic impacts would remain significant, even after implementation of the required mitigation measures. The proposed mitigation provides adequate capacity for the project traffic but does not mitigate for the larger capacity problem that Caltrans will be addressing with it long-term improvements of SR 67. The proposed mitigation, when implemented, is adequate to address project impacts and constitutes feasible and proportionate mitigation.

BB-3
The commenter provides a personal observation of a golden eagle on the project site. This species is included in the species list for the project site, and a study of the foraging habits of this species was done. Refer to Responses to Comments A-8 and T-4. The golden eagle study and the Project EIR provide detailed analysis regarding wildlife species, including bird and raptor species, on the project site and within the surrounding grasslands. Potential impacts were determined to be less than significant with appropriate mitigation as detailed in Section 3.1.6, including the designation of a total of 457.4 acres (67 percent of the property) of open space for inclusion in the Ramona Grasslands Preserve. The commenter does not provide any basis for the statement that 1-acre lots would result in the loss of the preserve (the project proposes a low-density

17924 Highway 67
Ramona, CA 92065

development with 1- to 3.1-acre residential lots). Since the comment is not supported by a factual basis, it is a personal opinion and does not raise specific issues related to the adequacy of the environmental analysis in the Project EIR and no response is necessary.

BB-4
The commenter's concern will be included in the project record and the decision makers will consider it during project deliberation. The comment does not address the analysis presented in the Project EIR and no response is necessary.

-----Original Message-----
From: jminervini1@cox.net [mailto:jminervini1@cox.net]
Sent: Monday, December 13, 2010 3:44 PM
To: Brazell, Kenneth J; caltrans; calrtrans; CALTRANS; Rayback, Terrence; Jacob, Dianne
Cc: Hofreiter, Larry; kristi mansolf; ramona sentinel; Spanbauer, Robert
Subject: Intersection of Hwy 67 & Highland Valley, Ramona

For the last few decades, Ramona has been subject to the inadequacies Of the above intersection (hereinafter referred to as "intersection.")DPW and Caltrans has the intersection rated as LOS F. An attempt was made to realign/fix the intersection some years ago, but possibly because of the complexity of the problem, all the new curbing, blacktop, traffic signals, the attempt to "fix" the intersection proved to be a failure during peak traffic hours, both morning and evening. .....so, the intersection and Ramona was put on the back shelf. Some of the above various agencies and individuals looked the other way and thought the problem would go away.

CC-1

Our local Ramona Community Planning Group led this "cluster" of people and even after numerous requests by Ramonans, failed to put the intersection on their "top ten road improvement priority list."

Presently, two new housing projects in the pipeline: the Montecito Ranch (417 homes) and Cumming Ranch (125 homes) they are required, as mitigation, to fix the intersection. The 2 developers have designed and Caltrans has approved, a new intersection design ("fix #2") that will help the congestion but, unfortunately, falls short and will be inadequate to fully address the problem. SO, HERE WE GO AGAIN.....FIX NUMBER TWO AND WE STILL WON'T GET IT RIGHT.

I strongly urge all of you to get together and add the below items to fix #2. Assuming you are looking at the design of fix #2 (as shown in the DEIR for the Cumming Ranch), you should:

ON HIGHLAND VALLEY:
1. add one more left turn lane (making it a total of 2 left turn lanes.
2. add an exclusive right turn ONLY lane.....in addition to a straight thru lane
3. the straight thru lane should be given the lowest green light time possible in

CC-2

the morning and should go last....not first.

ON 67, WESTERLY (or per Caltrans, the SOUTH) SIDE OF INTERSECTION:
1. add a lane that would collect the right turn lane ONLY traffic from Highland Valley....this will allow Highland Valley to turn right at the same time the Northbound Dye Rd. 2 left turn lanes are turning...remember, everyone, its important we clear the intersection quickly.

ON DYE ROAD:
1. add a right turn only lane.

CONCLUSION:

CC-3

All of you have a stake in this intersection. Please, I don't want to hear, "This is a State Highway and Caltrans is responsible," or "This is a County road

Letter CC
Jim Minervini

CC-1
The commenter provides a description of traffic problems at the Highland Valley Road and SR 67 intersection. The SR 67 and Highland Valley Road/Dye Road intersection improvements proposed by the project, as detailed in Section 1.1.2 and in Figure 1-8 of the Project EIR and also outlined in Mitigation Measure M-TR-1b, would improve the capacity of the intersection because it would result in more efficient signal timing; reduce vehicle queues; accommodate future traffic volumes; and achieve acceptable intersection operations per County Level of Service (LOS) standards. With the proposed improvements, the intersection would operate at LOS C or better as described in Section 2.1.6 of the Project EIR. As noted in the Caltrans letter (Letter C), Caltrans traffic engineers agree with the proposed mitigation.

CC-2
The County acknowledges the concern the commenter has expressed regarding existing traffic conditions at the SR 67/Highland Valley Road intersection and how the project may exacerbate the situation. The project has significant direct and cumulative impacts to the SR 67/Highland Valley Road intersection (Mitigation Measures M-TR-2a and M-TR-7). However, Mitigation Measure M-TR-1b will mitigate the project's impact at this intersection to a less than significant level. As summarized in Chapter 2.1.6, the proposed improvements at this intersection will improve LOS from E to C in the AM peak hour and from D to B in the PM peak hour. No changes were made to the EIR as a result of this comment.

CC-3
As specified in the project description and in Mitigation Measure M-TR-1b, the project developer would be required to fund and construct the proposed intersection improvements. As detailed in Response to Comment CC-1 above, the improvements are required to mitigate direct and cumulative impacts to the intersection and achieve acceptable operating conditions.

CC-3 cont

so the County is responsible. " I don't care who pays for the right fix. Dianne Jacob at one time said she would come up with the money; SANDAG allocates millions for needed projects If you have representation from the Ramona Community Planning Group (RCPG) at any future meetings in this regard, I strongly urge you include me in your meetings so that you hear what most Ramonans want. Thanks to the RCPG, who never made this› intersection (the worst traffic problem in Ramona) a priority, we now have a chance to be proactive. Lets get it right this time.....let's not create a need for a "fix #3."

Joe Minervini, Ramona Resident
3430 Cecelia Jo Rd. (about 1/4 mile from the intersection)
(619) 204-0391

-----Original Message-----
From: Vivian Osborn [mailto:vivstir@sv-mail.com]
Sent: Fri 11/12/2010 7:32 AM
To: Hofreiter, Larry; vivian osborn-taft
Subject: Cmming Ranch DEIR and Draft HLP

Hello Larry. Well it is finally out. Will be commenting on DEIR soon. However, I noticed on Page 14 of the Habitat Loss Permit (HLP) document a sentence under the NCCP FLOWCHART that seemed unrelated.

It refers to: "Neumann project is defined as being "Intermediate Value."

Comment: I believe this sentence places the entire HLP in question as to accuracy.

Further: The FLOW CHART QUESTION #5:

5. Is the land located in a corridor between higher value districts. No

Comment: I believe this is incorrect as well. The location of this project is essential in its whole area for wildlife by following reasons:

DD-1

1. The entire 682.6 acres are a watershed for San Diego County
2. The high value Wetlands and Rivlets as shown on the SANDAG, August 31.1999, "Ramona 2020 Constraints Map" are not recorded in the HPL. This wetland supports down stream habitat that will be adversely affected by:

A .. The potential for water contamination from the Urbanization of the entire project area is not addressed.

B. The fresh water from the Ramona area via the Etcheverry and Santa Maria Creeks to Lake Hodges is not addressed as a valuable in the FLOW CHART

C. The loss of slow absorbs ion for Ground Water Recharge is not address.

D. The known contamination of roads and 125 roof tops affecting the surrounding Ground Water dependent large lots is not addressed in the HPL.

I submit to you that this HPL is inaccurate Page 13 in Finding 3:
The habitat loss is incidental to otherwise lawful activities.

Please advise. Thank you, Vivian Osborn
17279 Voorhes Ln., Ramona 92065 (760)789-2872

Letter DD
Vivian Osborn

DD-1

Comments noted. Corrections have been made to the NCCP 4(d) findings, as necessary. These findings are reviewed by, and concurred in, by the wildlife agencies and the content is guided by the Southern California Coastal Sage Scrub Natural Community Conservation Planning Conservation Guidelines (1994). The email provides questions and comments on the Habitat Loss Permit and does not provide specific comment on the analysis provided in the Project EIR and no response is necessary.

From: Vivian Osborn [vivstir@sv-mail.com]

Sent: Sunday, November 14, 2010 7:46 PM

To: Hofreiter, Larry

Subject: Re: Cmming Ranch DEIR and Draft HLP

DD-2 Thank you Larry. Do you have a list of the APN #'s for the Cumming Ranch parcels? I know I have them some where, if I can find them within the numerous files I have on this project. It has been on going since 1996 for me. Every few years it pops up with more twists. Sorry to bother you and I will keep looking for my list. Vivian

DD-2
This email requests information from County staff and does not provide specific comment on the analysis provided in the Project EIR and no response is necessary.

From: Vivian Osborn [vivstir@sv-mail.com]

Sent: Monday, November 15, 2010 8:51 AM

To: Hofreiter, Larry

Subject: Cumming Ranch Tech Appen

DD-3 Hi Larry. I have Vol I & II of Tech. Append.s Are there additional Append. that address the Sewer Extension? Vivian

DD-3
This email requests information from County staff and does not provide specific comment on the analysis provided in the Project EIR and no response is necessary.

From: Vivian Osborn [mailto:vivstir@sv-mail.com]

Sent: Wednesday, November 24, 2010 10:00 AM

To: Kristi Mansolf; Hofreiter, Larry

Subject: Minutes of Previous Approval of cumming

DD-4 Kristi. And Larry. I am at a complete loss for finding the Minutes on document regarding the RCPG approval of Cumming Ranch. I found one RCPG copy of 2005 Minutes and there was no Cumming Ranch on West for that meeting. Now I just this minute even misplaced that one. If you can, help direct me to where that document of some kind of approval I would be so grateful. I will try Larry Hofreiter as well. Thank you both. Vivian

DD-4

This email requests information from County staff and does not provide specific comment on the analysis provided in the Project EIR and no response is necessary.

From: Vivian Osborn [vivstir@sv-mail.com]

Sent: Friday, November 26, 2010 9:55 AM

To: Hofreiter, Larry

Cc: Kristi Mansolf; Ramaiya, Jarrett

Subject: Re: Minutes of Previous Approval of cumming

DD-5 Thank you Larry. I have copy now of RCPG. Do you have note on when the project decreased the size of lots and increased the density of lots that are across from Voorhes Ln.? The current map now shows these changes. Thank you and I am sure you too had a wonderful Thanksgiving.

Vivian

DD-5
This email requests information from County staff and does not provide specific comment on the analysis provided in the Project EIR and no response is necessary.

From: Vivian Osborn [mailto: vivstir@sv-mail.com]

Sent: Thursday, December 02, 2010 6:37 AM

To: Hofreiter, Larry

Subject: Cumming Ranch connection to Church Project

DD-6 Good morning Larry. Big night at the RCPG this evening. Would you be able to direct me to where the Spirit of Joy Lutheran Church project is associated with Cumming Ranch Project? That project is listed only as one of many that are a cumulative impact. Where is the detail of their contribution to the Sewer Extension? Thank you for helping. Vivian Osborn

DD-6

This email requests information from County staff and does not provide specific comment on the analysis provided in the Project EIR and no response is necessary.

From: Vivian Osborn [mailto:vivstir@sv-mail.com]

Sent: Thursday, December 02, 2010 9:33 AM

To: Hofreiter,Larry

Subject: Re: Cumming Ranch connection to Church Project

Thank you Larry.

DD-7 I found out all that this morning. However, what cost $$ contributions does the Church, specifically, have to make to the Sewer Upgrades for impacts to the area? Also, the Sewer is contingent on several issues to resolve before it can create a Letter of Availability and that at this time the Sewer is NOT available within the next five years. If I read that correctly? Vivian

DD-7
This email requests information from County staff and does not provide specific comment on the analysis provided in the Project EIR and no response is necessary.

From: Vivian Osborn [mailto:vivstir@sv-mail.com]

Sent: Thursday, December 02, 2010 2:09 PM

To: Hofreiter, Larry; vivian osborn-taft

Subject: Re: Cumming Ranch connection to Church Project

Just to be clear, Larry. The letter continues to read "B' " Explain in space below or on attached. Number of sheets attached "Based on sewer system evaluation (See attached conditions)" next page:

"Conditions for Sewer Availability Letter (Not in the Active Sewer Powers)

There are: a. The Project is not within the Sewer Service Area and not within its Active Sewer Powers

b. Sewer facilities are not reasonably expected to become available within fire (5) years unless the following conditions are met: i, ii, and iii

COMMENT: (these are not met and the project is premature)

DD-8

c. "the Sewer System Evaluation shall be completed and a Sewer Service Agreement or Pre-Annexation Agreement executed before the Draft (CEQA) documents are prepared and before the District will sign a "Project Facility Commitment Form"

COMMENT: (This has not been completed. The project is premature in stating the availability of the Sewer.)

d. Should these ordinances, resolutions, rules regulation, specification, guidelines, and system conditions change from time to time. the applicant for shall be subject to the requirements in effect at the time of applying for (water) service.

COMMENT: Larry. letter d.(water?) Is this another example of cut and paste gone wrong? What else is copied from other documents and misleading? These reference documents are a year and a half old. dated: 5/4109. Has anything changed?

Just wondering and I am not a professional. sorry to be such a pest. It is important to me and I thank you for helping me. RMWD is assisting as well, in my education. Vivian

DD-8

Comments noted. The comments are related to the sewer and water availability forms, and updated forms have been received since this email was received. This email requests information from County staff and does not provide specific comment on the analysis provided in the Project EIR and no response is necessary.

From: Vivian Osborn [vivstir@sv-mail.com]

Sent: Thursday, December 02, 2010 4:52 PM

To: Hofreiter, Larry

Subject: Re: Cumming Ranch connection to Church Project

DD-9 Thank you Larry. I never thought you were misleading me and I will be grateful to send inquiries to your assistant. Looks like this one is a done deal. I will include my 'approving conditions' when I submit my comments on the DEIR. Thanks again. Take care Vivian

DD-9

This comment is a conversational email between the commenter and County staff. It contains commenter opinion and does not provide specific comment on the analysis provided in the Project EIR. Therefore no response is necessary.

-----Original Message----
From: Vivian Osborn [mailto:vivstir@sv-mail.com]
Sent: Thursday, December 16, 2010 8:43 AM
To: Hofreiter, Larry; vivian osborn-taft
Subject: Comment DEIR Cumming Ranch via e-mail. hard copy to follow via us mail

December 16, 2010
ATTN: Larry Hofreiter
Via E-mail: larry.Hofreiter@sdcounty.ca.gov Pages 1-11
FROM: Vivian D. Osborn, 17279 Voorhes Ln., Ramona, CA 92065
RE: GPA 03-007; SP 03-005; TM 5344; STP 10-007; REZ 07-002, LOG NO. 03-09-028; SCH NO. 2004031136; CUMMING RANCH PROJECT

COMMENTS ON THE DRAFT ENVIRONMENTAL INPACT REPORT INCLUDE:

DD-10 SATEMENT: The GPA 03-007 is an unnecessary Amendment to the Ramona Community Plan. It AMENDS the Goal within the Community Plan that upholds the Rural Character of the Project area. QUESTION: Why would the Decision Makers consider creating an Urban Area that is far removed from the Urban Town Center? FACT: The Proposed Project

DD-11 extends Urban Sewer Service to the EDA that currently allows 2, 4, 6 acre zoning. This creates a 'finger' of urban service that can be used by other projects now and in the future.

DD-12 This project is Premature and Growth Inducing. The proposed project is Growth Inducing by the facts presented within the DEIR:
1. DEIR Page 1-37 1st paragraph "It is anticipated that the Spirit of Joy church project (listed as number 10 in Table 1 7, List of Cumulative Projects) located adjacent to the Cumming Ranch project site would connect into the proposed sewer system. This connection has been coordinated between the two projects as it is the most logical service solution with the least amount of future disturbance. However, if the Cumming Ranch project was not implemented, the church would need to pursue other options to facilitate planned development of the property. Development of the church property is considered infill development and would be expected to occur with or without implementation of the Cumming Ranch project."

OMMISSIONS WITHIN THE DEIR: COMMENT: 1. The project must address the lack of analysis of this statement. The statement is without supporting analysis and without basis in fact as to the alternatives for the Spirit of Joy.
2. Has there been an analysis of the Church Property to ascertain the use of septic system?
3. This question must be answered within the DEIR.
4. The DEIR is INCOMPLETE and must be recirculated with all the analysis that the project considers as PART OF THEIR PROJECT.

DD-13 COMMENT: The Project requires approval of LAFCO to extend the Sewer Service Area with an extension of Sewer Line to through the Open Space Area A & B. This requires approval of the RWQCB The sewer lines to the Tract Houses cross wetlands and rivlets that currently serve the Etcheverry Creek and the Santa Maria Creek that serve Lake Hodges.

Page 2

ADDRESS ERRORS AND OMMISSION WITHIN THE DEIR

DEIR: CHAPTER 4.0 ENVIRONMENTAL EFFECTS FOUND NOT TO BE SIGNIFICANT
4.1 Effects found Not Significant as Part of the EIR Process
DD-14 4.1.1.2 Guidelines for the Determination of Significance Page 4-8, 4-9 and 4-10.
COMMENTS/CONCERNS:
1. The DEIR fails to consider to consider the SANDAG 1999 CONSTRAINTS MAP in its analysis of the wetlands and watershed that the project impacts within its URBAN

DD-10
This comment is incorrect. The project would not create a new urban center.

DD-11
The comment is correct that there is an extension of sewer service for the proposed development. However, as described in Section 1.7 of the Project EIR, the sewer extended to Cumming Ranch is proposed to serve only the site and the adjacent site owned by the Spirit of Joy church.

DD-12
The analysis provided in Section 1.7, Growth Inducement, of the Project EIR shows that the project is not growth inducing for multiple reasons. As stated in Section 1.7, page 1-37, the Spirit of Joy church project is an independent project and is not dependent upon the Cumming Ranch project. It is correct that the two projects have coordinated sewer service as this is a logical and efficient option rather than running two separate lines; however, neither project is dependent upon the other. As explained in the Project EIR, the Spirit of Joy church could move forward with other sewer provision options if the Cumming Ranch project were not implemented. It is not necessary for the Project EIR to provide analysis of a separate and independent project's ability to use septic systems.

DD-13
Table 1-5 of the Project EIR includes the necessary approvals as required by LAFCO and the Regional Water Quality Control Board. Sewer mains will be constructed using the latest technology and materials. The sewer lines crossing watercourses will be engineered to be placed at sufficient depths to avoid degradation and scour by flood flows.

DD-14
As explained in Response to Comment S-4, the project is a "Priority Development Project," under these regulations and therefore subject to the County of San Diego Standard Urban Stormwater Mitigation Plan (SUSMP) Requirements. Storm water treatment for the project requires Low Impact Development ("LID") standards to be implemented. The project's LID design will ensure onsite treatment through dispersal of runoff to landscaped areas, filters, settling ponds, pervious pavements, bioretention facilities, flow-through planters, dry wells, infiltration basins, constructed wetlands, and/or cisterns.

FOOT PRINT will potentially create on this watershed component of the project site.

DD-15 2. The DEIR fails to consider all the URBAN projects impacts on downstream neighborhoods that are completely dependent on well water and the grasslands and undisturbed hillsides of watershed that absorb annual rainfall within the existing agricultural project site.

DD-16 3. The Hydrology Studies minimizes the effects to the surrounding biological resources that depend on undisturbed and/or altered topography, roads and dwelling uses of manmade materials that enter the stream bed.

4. The project describes the use of "riprap (pg.4-7 County Grading Ordinance #3) energy dissipaters for any storm drains to reduce velocities to nonerosive velocities;".

DD-17 A. This statement of intent violates The Ramona Community Plan as it describes the "avoidance of alterations to the natural waterways within our planning area" and is specific in the 'no use of riprap' to distract from the natural flow of the Santa Maria Creek and Etcheverry Creek.

DD-18 5. The project proposes to locate the Sewer Lift Station within the 100 year floodway.

DD-19 COMMENT: 1. The DEIR fails to address the above comments, 1 -5.

DD-20 2. The proposed project fails to be identified as an URBAN DEVELOPMENT in a rural, natural habitat. Therefore the DEIR fails to identify all the impacts that are significant and unavoidable.

DD-21 3. The NO BUILD ALTERNATIVE and THE REDUCED PROJECT ALTERNATIVE WITH NO EXTENSION OF THE SEWER SERVICE ARE THE ONLY VIABLE CHOICES.

DD-22 COMMENT: 1. The Proponent must return with a project that conforms the Rural Character of the Ramona Community Plan.

2. The development must conform to the surrounding neighborhoods. 3. The DEIR is far reaching and provides, I believe, inaccurate statements that the surrounding neighborhoods are on 1 acre lots that border the planned housing development. This statement is misleading at best. The DEIR statement through out the DEIR is referring to an existing development (aka 'the

DD-23

Page 3

acres') that is east of the project that was established over 30+years ago and is within the current sewer district and within the Town Center Boundary Map. THIS 1 ACREA SUBDIVISION IS IN FACT SEPARATED FROM THE PROJECT HOUSING SITES BY 282.56 ACRES (APN 282-010-43-00), that is IN FACT: Preserved Vernal Pools, The Santa Maria and Etcheverry Creeks and has always been grassland/grazing acreage.

DD-24 4. The DEIR must accurately describe the neighborhoods surrounding neighborhoods by using the San Diego County Accessor Parcel Maps for surrounding area as the facts of those maps provide information showing properties existing homes on 2, 4, 8, and 20+ acres. . CORRECTIONS TO: Table 1-7 List of Cumulative Impacts

DD-25 1. Page 1-69 #9 MUP 06-001 Immaculate Heart of Mary Catholic Community Church: Location 16585 Highland Valley Road This is incorrect. The Catholic Church does not own property at that location. COMMENT: This error questions the accuracy of the entire document. I am requesting an Extension of the Public Review Period.

DD-26 2. There are NO accurate view simulations of the proposed houses view shed along the northern border of the project bordering Voorhes Ln. COMMENT: This avoids presenting to the Decision Makers any sense of the impact that this proposed urban project will have on the Rural Character of the Voorhes Ln. neighborhood.

DD-27 3. Inaccurate DEIR Figure 1-11. This Figure shows that the new proposed Sewer Line will interject into the current Sewer Line that serves the Mt. Woodson Development. COMMENT: This interjection by the projects sewer line violates the EIR of the Mt. Woodson Sewer Line that states: "The Mt. Woodson Sewer Line will not be Growth Inducing as no other project will be allowed to connect to it, other than the Mt. Woodson Elementary School. "

DD-15
Impacts to groundwater quality are addressed in Section 4.1.1 of the Project EIR (depletion of groundwater was found to be not significant in the Initial Study, which is Appendix N of the EIR). Since the project does not utilize well water, the quantity of well water would not be affected; since the project is required to comply with the County Watershed Protection, Stormwater Management and Discharge Control Ordinance, groundwater quality would not be affected. Details regarding hydrologic changes that would result with implementation of the Cumming Ranch project are analyzed in hydrology studies prepared for the Cumming Ranch project, including the Hydrology and Drainage Study and Storm Water Management Plan and are determined to have less than significant water quality effects. Refer to Response to Comment S-4.

DD-16
The biological resources reports considered potential impacts of all project features including proposed drainage facilities. In addition, the hydrology studies demonstrate that runoff (flow and quality) from the proposed project would be at or below predevelopment conditions due to lengthened flow paths, reduction of slope, and improved quality and quantity of vegetative cover to enhance infiltration of surface storm discharge. Therefore, potential biological impacts from poor water quality would be avoided. The project design would result in the absorption of pollutants in storm water runoff from the project site.

DD-17
The commenter is incorrect. The description of the use of riprap, as quoted, occurs on page 4-7 of the Draft EIR, in the regulatory setting of the Hydrology and Water Quality section. The text states that the project would be subject to the County of San Diego Grading Ordinance and then describes some of the methods employed by the grading ordinance, including the proper sizing of riprap around storm drains and basins. However, the project does not propose riprap or other energy dissipaters in natural waterways, including Etcheverry Creek or Santa Maria Creek.

DD-18
The commenter is incorrect in stating that the proposed lift station is located within the 100-year floodway. The lift station is located outside of the “area subject to inundation per 100-year flood.” It is required that the lift station be placed a minimum of 2 feet above the flood water elevation.

DD-19
Items 1 through 5 are addressed in the previous responses to each specific item.

DD-20
The urban development designation is for the application of the County Standard Urban Stormwater Mitigation Plan (SUSMP) and is dependent on the amount of impervious surface that is proposed. The project is clearly described throughout the Project EIR as a residential development with urban features such as homes, landscaping, roads, infrastructure, and other components. All project components, urban or otherwise, have been considered within the analysis of the EIR. The Project EIR also clearly describes the project site as currently undeveloped and used for agricultural purposes. Details of the rural nature of the site are presented in sections such as 4.1.3, Agriculture and 4.1.4, Land Use. The native conditions that exist onsite are documented in Section 3.1, Biological Resources.

DD-21
The comment notes that the No Build Alternative and the Reduced Project Alternative with no extension of sewer service are the only viable options, but does not provide specific reasons. The comment does not address the analysis presented in the Project EIR. No response is necessary.

DD-22
The proposed project has a rural residential character. Refer to Response to Comment T-2.

DD-23
While the Cumming Ranch project would introduce a development that has some smaller lots than the surrounding rural residential area, the project density and character are compatible with the surrounding area. Refer to Response to Comment T-2. Please note that language in the Final EIR has been modified to more clearly describe the surrounding residential lots. Refer to Land Use, Section 4.1 in the EIR.

DD-24
The commenter's opinion regarding land use analysis methodology is acknowledged and is included in the project's Final EIR for the decision makers to consider. No additional response is necessary. However, to better describe the existing land use, the Final EIR has been modified to present more information regarding the lot sizes surrounding the Cumming Ranch site. Of the existing residential parcels located within 300 feet of the project boundary, lot sizes range from 0.55 acre to 14.82 acres. The average parcel size is 3.24 acres and the overall density is 0.31 dwelling units per acre. While the average lot size proposed for the Cumming Ranch project is 1.5 acres, the proposed density is 0.18 dwelling units per acre, or about 40 percent less than the density surrounding the project.

DD-25
The comment is noted. The error in the address of the cumulative project has been corrected in the Final EIR.

DD-26
The commenter is concerned with limited views to the south of the project site from private lots along Voorhes Lane on the north side of Area A. The key views and associated simulations were chosen to represent views from public vantage points. The six residences along Voorhes Lane were not included in a key view analysis because the project is compatible with these existing properties in that it proposes residential land use with similar lot widths fronting on the street. The project site has always had a specific plan land use designation and development has been anticipated for more than 20 years. Furthermore, the properties along Voorhes Lane have limited views of the project, as the project will have no access to Voorhes Lane and a vegetated buffer along the lane has been incorporated into the project design. Key visual features, such as ridgelines and stands of trees, have been preserved in open space in order to maintain the most important visual features of the rural, open, and natural aesthetic environment. The visual change is considered less than significant. Refer to Response to Comment V-33.

DD-27
The comment is inaccurate. Figure 1-11 of the Project EIR shows that the proposed Cumming Ranch sewer line would not connect to the Mt. Woodson sewer line, but would run parallel to it. The two lines are shown with different hash marks to distinguish each line individually, and though close together, they are not combined. Also, the separate lines are specifically described on page 1-11, which states, “The main sewer line would be located in a minimum 20-foot easement that would be separate and independent of other existing lines that enter the treatment plant from the west, including the main sewer line from the Mount Woodson area.”

OMMISSIONS: Within the DEIR TECHNICAL APPENDICES, VOLUME II
1. CHAPTER 1.0 SUMMARY OF FINDINGS 1a. Page 3. F. NOISE GENERATED
ONSIGHT COMMENT: The document fails to address the noise generated from the Sewer Lift Station by admission of no data, 5th sentence beginning: "Information on the specific pump, standby generator, and associated equipment is unavailable at this time." "Based on that analysis, " previous sentence ("best engineering information available") "noise from the lift station would result in an exceedance of the noise limits of the County Noise Ordinance without mitigation, which represents a potentially significant impact."
COMMENT: The Proponent is now required to obtain a Minor Use Permit to ensure a Noise Study. This becomes: acceptance prior to a Finding. The document

Page 4

DD-28 is breaching the Comment Period for the DEIR and the TECHNICAL APPENDICES by withholding information until after the DEIR is circulated. This is 'incremental' development and a violation of CEQA.

The DEIR continues in the following sentence and refers to "mitigation measure has been included in Chapter 6.0 that would require the applicant to obtain a Minor Use Permit and submit a site plan with a noise study demonstrating the lift station will comply with the County Noise Ordinance prior to issuance of grading or improvement permits for the project."
OMISSION: There is NO "CHAPTER 6.0" within the TECHNICAL APPENDICES OR THE DEIR OR THE General Plan Amendment and Specific Plan that describes a MUP for this portion of the Proposed Project. The DEIR, CHAPTER 6.0 Page 6-1 is a "LIST OF REFERENCES"

I respectfully request that the period of review for this incomplete DEIR be extended until all the studies are available to the public and the Decision Makers.

SUMMARY Page S-1
DD-29 Page S-4: Issues to Be Resolved by the Decision Making Body. States: "The Board would be required to adopt a Statement of Overriding Considerations explaining why they would be willing to accept each significant impact."
COMMENT:
The described project within the DEIR is inadequate in describing the direct impacts to the Rural Character of the project area.
DD-30
1. It does not accurately describe the surrounding neighborhoods.
2. The Community Character of the Ramona Community Plan discourages premature extension of sewer service.
3. The Ramona Community Plan states: Rural Character shall be enhanced.
4. The Proposed Project is an extension of Urban Service into the Rural Agricultural Area Designation.
5. The Proposed Project is Premature and Growth Inducing by its own description within the DEIR. (Page 1-37)

DD-31 Supporting Comments: This Description and history observed by Vivian Osborn, a neighbor to the 682.6 acres, since 1978.
The surrounding area is typified by large lot zoning. The existing Ramona Community Plan, with the current designations and past road standards, has allowed development in the constrained lands surrounding the proposed project. However, the neighborhoods that were developed earlier than 1978 did not have the current Environmental guidelines. Under the current guidelines for Private Roads

Page 5

DD-28
The exact specifications of the equipment to be used in the sewer lift station are not available at this point in the planning process. For this reason, the noise study used noise levels associated with representative lift stations that use equipment similar to that anticipated for the proposed project facility. As noted in the comment, the noise study found a potentially significant noise impact to nearby receptors due to noise generated by the sewer lift station. The mitigation measure proposed in the Project EIR, Mitigation Measure M-N-6, requires abatement of noise from the lift station to below County Noise Ordinance Standards. The requirement of a noise study as part of the Minor Use Permit is not withholding information from the public; rather it is a mechanism to ensure that the requirement to mitigate noise levels is achieved. The noise study prepared as part of the project mitigation would determine the most appropriate abatement measures, such as enclosure of equipment, orientation of equipment, or similar measures to reduce noise levels. Thus, the preparation of a noise study as required in the mitigation measure is necessary to verify that the mitigation is successful, not to determine impacts, and is not a violation of CEQA requirements.

The comment is incorrect in that there is no Chapter 6.0. The comment quotes from the Noise Study, which references mitigation provided in Chapter 6.0. Within the Noise Study, Chapter 6.0 is “Measures to Minimize Noise Impacts” and contains the information referenced in the comment.

The public review period was appropriate and all project documents and studies were available during the review period.

DD-29
It is correct that the County Board of Supervisors would be required to adopt a Statement of Overriding Considerations regarding the significant and unmitigable traffic impacts that would result from the project. Refer to Response to Comment T-2.

DD-30
The Project EIR provides descriptions of the surrounding area in multiple locations throughout the document. Section 1.4, Environmental Setting, is very clear in describing Ramona as a rural community with historic agricultural operations. Section 4.1.4, Land Use, also provides a detailed description of the surrounding area. Additional detail has been added to these sections in the Final EIR to provide more detail regarding the surrounding areas. Refer to Response to Comment T-2 regarding compatibility with the surrounding area. Please note that the project site is not designated for agriculture. The Ramona Community Plan designates the site as the Cumming SPA and the County of San Diego

General Plan designates the site as a Specific Plan Area (21). The site is zoned Specific Planning Area (S88).

The extension of sewer service to the project site is not premature as the site has been designated for residential development in the Ramona Community Plan and County of San Diego General Plan for many years. The Specific Plan Areas (SPAs) within the Ramona Community Plan, including the Cumming SPA, have been designated as such as they are the most logical locations for planned growth.

The analysis provided in Section 1.7, Growth Inducing Effects, found the project not to be growth inducing.

DD-31
This comment provides information regarding the past use of the site and surrounding area. The comment does not address the analysis presented in the Project EIR. No response is necessary.

several developments would not have been achieved as they have 'spaghetti roads". However, again, these property's use only septic systems that function. Many property's on Highland Valley Road use imported water because it is available. These neighborhoods have animal husbandry, large gardening and small agricultural business's that thrive on the larger lots of 5, 10 and 20 acres.

DD-31 cont

The Cumming Ranch was used for grazing cattle by the previous owners and was never put into dry land oat hay until purchased by the projects proponents. Since 1996 the attempt to grow oat hay has been a half measured poor attempt. All the native grasslands were destroyed with these tactics. The crop was often not even harvested. The cattle have been removed from the Project Area to the adjoining Hardy Ranch Parks Land because of lack of fencing to confine the small herd on the Project Site. This small herd was allowed to graze all year long which was never done during the previous ownership. The original cow/calf operation use was primarily in the spring and that herd was always pulled off the land as winter rains began. Best Management Practices were followed. Best Stewardship was practiced because of the watershed that is intense during our rainy seasons. The entire Project area is valuable grazing land and completely compatible with Natural Environment (NATURAL CAPITAL) and can be again if left to conservancy.

DD-32

COMMENT:
Page S-5 "NO BUILD ALTERNATIVE" and "THE REDUCED PROJECT ALTERNATIVE"

1. These are the appropriate alternatives.

DD-33

A. Growth Inducement by the proposed Project Proponent has been straight forward by announcing in the DEIR that the Spirit of Joy Lutheran Church will be allowed to 'tag' on to the extension of the proposed Sewer Service extension.
B. The Church property was purchased, sight unseen by the Lutheran Offices in the Midwest prior to 1978. This property is a wetland and cannot be built to the church's proposed requirements. Until the Cumming Ranch proponent offered the Church 'sewer accessibility' the church had no alternative except to try to sell their property or find another location for the size church they believe they need. This same congregation may now decide that they will have a valuable property to offer for sale with the extension of the sewer service to their site. Very possibly to a commercial entity.
C. This is a fact and proof that this type of Sewer Extension can and will be Growth inducing.

DD-34

COMMENT: This unfettered attempt to urbanize the beautiful serenity of the southwest entry to Ramona is unprecedented since I moved to Ramona in 1973.

Page 6

CHAPTER 1.0 PROJECT DESCRIPTION AND ENVIRONMENTAL SETTING

DD-35

COMMENT: This Chapter is Incomplete.
1. The obvious absence of any attention to the impacts to wetlands and rivlets that traverse this 682.6 acres is egregious. This data is available within the SANDAG CONSTRAINTS MAP August 1999. The data is available to the DEIR and it is omitted from the DEIR.
A. The DEIR is Incomplete and does not satisfy CEQA. The DEIR must be resubmitted with complete data addressing all the Impacts.

DD-36

2. The Clean Water Act has not been calculated into the impacts caused by the type of URBANIZATION that is proposed on this watershed for Ramona and the San Diego County i.e. Lake Hodges. (see August 1999 SANDAG Constraints Map 2020)
A. The DEIR is Incomplete and must be resubmitted with all the data available to the Decision Makers.

DD-37

3. The insistence of the Proponent that the donation of land to the County to help preserve the Ramona Grasslands Project is inaccurate, I believe.
A. The preserved Acreage of 457 parcels, including Areas C and B, are landlocked. It cannot be accessed or developed except by this project being

DD-32
The commenter's opinion regarding appropriate alternatives is acknowledged and is included in the project's Final EIR for the decision makers to consider. No response is necessary.

DD-33
The commenter presents a narrative of the church project history and status. As stated in Section 1.7, page 1-37, the Spirit of Joy church project is an independent project and is not dependent upon the Cumming Ranch project. It is correct that the two projects have coordinated sewer service as it is a logical and efficient option rather than running two separate lines; however, neither project is dependent upon the other. The possible future use of the church property is not a part of the proposed project and, therefore, is not addressed in this EIR except in the section analyzing the growth-inducing effect of the proposed project. The EIR determined that development of the two project sites with sewer service would not result in significant growth-inducing impacts. Any development on the church site that requires a discretionary permit would be subject to separate environmental review and approval.

DD-34
The commenter's opinion regarding the project's effect on the southwest entry of Ramona is acknowledged and is included in the project's Final EIR for the decision makers to consider. No response is necessary.

DD-35
The County disagrees that Chapter 1 is incomplete. Furthermore, the Project EIR and the supporting technical documents specifically identify all jurisdictional wetlands on the project site and describe all impacts and necessary mitigation measures. As detailed on page 3.1-9 of the Draft EIR, jurisdictional wetland delineation was completed on the project site and identified 4.29 acres of Army Corps of Engineers jurisdiction and/or regulated water and wetlands, 55.73 acres of California Department of Fish and Game jurisdictional wetlands, and 64.13 acres of County Resource Protection Ordinance wetlands. This information is site specific and surveys were conducted per agency requirements. Direct and indirect impacts to jurisdictional wetlands and waters are described on pages 3.1-35 and 3.1-36 of the Draft EIR and identified as impact BI-12. Mitigation for impacts to wetlands and water is detailed in Mitigation Measure M-BI-12.

DD-36
The commenter is incorrect and the EIR is adequate. The Clean Water Act is specifically described in Section 3.1.1 under the Applicable Regulations and Plans heading, including both Section 404 and 401 requirements. As noted in Table 1-5, the Army Corps of Engineers and Regional Water Quality Control Board have permitting authority for these two applicable sections of the Clean

Water Act, which are required of the project. As described in Section 4.1.2 of the Project EIR and detailed in the associated hydrology studies, the runoff from the project site after development would be the same as or less than pre-development conditions due to lengthened flow paths, reduction of slope, and improved quality of vegetative cover to enhance infiltration of surface storm discharge; thus minimizing any potential for downstream water quality impacts. Also refer to Response to Comment V-8.

DD-37

The commenter is incorrect and the EIR is adequate. The Project EIR addresses the environmental impacts of the project as proposed. An EIR does not consider possible future scenarios that may occur if the project were to fail. The donation and sale of Areas C and B for open space is consistent with the designation of these areas as open space in the Specific Plan. If the project as proposed were to not move forward, other potential development proposals would require a new County discretionary review process with a new CEQA analysis and public hearings.

approved with the SEWER EXTENSION.
1. Therefore it is reasonable to believe that APPROVAL OF THE PROJECT AS PROPOSED would make this area more useable and valuable as an Industrial site if the project fails in its endeavor of a 'housing project.
2. This possibility creates 'sequential development' and violates CEQA.

DD-37 cont

B. The Area C of preserve is covered in Vernal Pools. The constant referral to "the relinquishing of the 'Industrial' component" of this project eludes the fact that site can not be built without the sewer extension. The DEIR does not address this and is INSUFFICENT.

DD-38

C. The entire 682.6 acres of this rangeland habitat is a WATERSHED/WETALND. This is not identified within the DEIR. The DEIR is DEFCIENT by OMMISSION.

DD-39

D. The preservation of this single component of Area C and Area B are INSUFFICIENT MITIGATION regarding the Edge Effects that the Proposed Project will have on the WATERSHED/WETLAND as Natural Capital Resources of Ramona and San Diego County.

DD-40

1. The DEIR fails in its purpose by excluding viable attention to this component. The DEIR must include all the data available or it is INSUFFICIENT. 2. The ONSIGHT MITIGATION appears to be 'double dipping' in its claims for MITIGATION by PRESERVATION of Area A Residential and Open Space. Preservation of Open Space on Residential Lots is no longer used as mitigation for the projects as it is not enforceable.

Page 7

TM 5344 AREA B OPEN SPACE:

DD-41

NEW INFORMATION THAT IS NOT INCLUDED IN THE DEIR. In an article in The Ramona Sentinel, December 2, 2010, the Ramona Municipal Water District (RMWD) states: "In their written response to the Cumming Ranch Project's Draft Environmental Impact Report (DEIR), Ramona Municipal Water District (RMWD) directors request that the district be allowed to use part of the open space easement as spray fields to service the proposed development."
COMMENT: This request is a "DESIGN CHANGE" in the entire project. This must require the change in the project and the impacts they will create. This last minute inclusion into the overall project is not available to review by the agencies that are required to comment on this project. I RESPECTFULLY REQUEST THAT THE DEIR BE RECIRCULATED WITH THIS NEW INFORMATION FOR PUBLIC REVIEW.

DD-42

Area C Open Space
The Ratio of 3 -1 is INSUFFICIENT for the impact to the:
A. Sensitive Environment.
B. Rural Character by the Density of the Urban Footprint.
C. The 2007 RPO is overstated and INSUFFICIENT in 2010 COMMENT: The "DESIGN CHANGE' alters the impacts to this sensitive area as edge effects to the VERNAL POOL within Area C Open Space.

DD-43

I respectfully request that the DEIR be Resubmitted with COMPLETE, CURRENT AND ALL AVAIABLE DATA TO ADDRESS THESE QUESTIONS, OMMISSIONS AND INCOMPLETE DOCUMENTS.

DD-44

UTILITIES:

COMMENT: There is no SEWER available to those who have already paid for the current facilities. There are no funds to improve the Santa Maria Sewer Facility within the next five years. There can be no letter of support from the Ramona Municipal Water District at this time as this may be misleading, at best. It may be unwise for the

DD-45

Decision Makers to approve another project in Ramona until the General Plan 2020 is

DD-38
The commenter is incorrect and the EIR is adequate. As described in Response to Comment DD-35, jurisdictional wetland delineations were performed to identify onsite wetlands. Section 4.1.1.1 describes the project site as being located within the San Diego Hydrologic Unit and part of the Santa Maria Valley Hydrologic Area. No part of the residential development is within the Federal Emergency Management Agency or San Diego County mapped floodway or floodplain. However, virtually all land is within a watershed, as rainwater that falls on land will flow to a low point. This issue is addressed in the Hydrology section and technical study.

DD-39
Although the commenter is not clear or specific in what environmental effects the comment addresses (resulting from edge effects on the wetlands/watershed), hydrological impacts were determined to be less than significant in relation to the watershed or downstream water quality. Assuming edge effects mean unauthorized access, the project proposes a Resource Management Plan that includes the following Goals and Tasks:

Goal C. 1: Maintain the current natural character of the open space preserve.

Task 1.1: In association with the Ramona Grasslands RMP, establish a stewardship program and develop a community volunteer patrol.

Task 1.2: Manage access and use of wildlife areas/corridors.

Goal A. 4 Reduce potential indirect impacts of surrounding land uses.

Task 4.2: Control recreational access to vernal pools and surrounding watersheds.

Therefore, the commenter is incorrect and the EIR is adequate.

DD-40
The commenter is incorrect and the EIR is adequate. No mitigation acreage would occur within residential lots. The only mitigation acreage within Area A would be within Open Space Lots G, I, and J of Area A, and within open space easements of Areas B and C. Refer to Response to Comment A-5.

DD-41
The commenter is incorrect and spray fields are not proposed. Refer to Response to Comment V-3.

DD-42
It is unclear what the 3 to 1 ratio in the comment is referring to. Area C would be donated for preservation in the Ramona Grasslands Preserve. The reference in the comment to "Design Change" is also unclear. If this term refers to the potential for use of Area B as spray fields, please refer to Response to Comment V-3.

DD-43
The Final EIR will address each comment provided during the Draft EIR public review period. The Final EIR will be available to the public at least 10 days prior to the first public hearing on the project. Since circulation of the Draft EIR, the Draft EIR has not been modified in a way that recirculation of the document is necessary. There were no significant omissions of information or additions of significant new information. The EIR adequately discloses the potential impacts associated with the project. A summary of the potential environmental impacts associated with the project is provided in Table S-1 in the Summary of the EIR.

DD-44
It is correct that the Santa Maria Waste Water Treatment Plant (SMWWTP) is currently at or above capacity. However, as detailed in Section 3.6 of the Project EIR, Ramona Municipal Water District (RMWD) is in the processes of expanding the capacity of the treatment plant and has finalized CEQA review and a design contract has been awarded. The expansions would provide capacity to serve existing customers as well as future customers. While expansions are anticipated to be complete prior to operation of the Cumming Ranch project, the Project EIR indentifies a potentially significant impact in the event that the capacity would not be available by the time the project requires sewer service. Therefore, the County's Board of Supervisor Policy I-84 requires that the Final Map for Cumming Ranch not be approved until issuance of a commitment of adequate wastewater treatment capacity. Additionally, Mitigation Measures M-PS-2 and M-PS-3 have been revised in the Final EIR to require that no permits that allow ground disturbance of the site be issued until evidence of permanent water and sewer facility commitment is submitted to the County.

DD-45
The County General Plan Update was adopted on August 3, 2011. This comment is opinion and will be provided to the decision makers to for consideration.

DD-45 cont

in place. The economy and the environment are too unstable and unpredictable at this time. This is especially true of rural areas that are far from work centers.

..

Page 8

DD-46

CHAPTER 2.0 SIGNIFICANT ENVIRONMENTAL EFFECTS WHICH CANNOT BE AVOIDED IF THE PROPOSED PROJECT IS IMPLEMENTED
Reference DEIR Page 2-19 "The cumulative impact at SR 67 between Poway Road and Archie Moore Road would remain significant and unavoidable."

DD-47

TRAFFIC:

The DEIR Pg. 1-35 Quote: "Daily commuter traffic associated with the project is located to the west of the Ramona Town Center, the commuter traffic generated by proposed project would not be required to pass (through) Town Center as the majority of traffic would be traveling west toward the San Diego area. This would avoid adding additional peak hour traffic to the Town Center, which is congested during peak commuter hours." Close quote

COMMENT: This admission by the DEIR appears to state the obvious. Individuals living in this urbanized housing project will likely work and shop by going South to main job centers and larger shopping sources. This Violates SANDAG 2030 & 2050 Goals

DD-48

COMMENTS AND CONCERNS TO BE ADDRESSED AND RESOLVED BY THE FINAL ENVIRONMENTAL IMACT REPORT

1. The Rural Lifestyle: Encroachment into the Rural Lifestyle of current residents by Urban Lifestyle.

DD-49

2. The Impact on Schools and Safety. Increased cars and buses generated from this urban development traveling to and from the town center.

DD-50

3. The Constrained Roadways: Resolve constricted and unsafe Highway 67 conditions not able to be mitigated.

DD-51

4. Unintended Consequences: Loss of the Rural Lifestyle for future family residents.

DD-52

5. The Affect on Agriculture. Large Lots that accommodate Dairy's and Egg Ranches. The loss of useable parcels for grass fed cattle, goats & large animal husbandry.

DD-53

6. The loss of Large Lots: Large Lots produce the valued fresh produce and locally grown foods that are naturally occurring now in this very special rural community.

DD-54

7. The Ramona Rural Character: Eliminating large parcels and that affect on future Generations.

CONCERNS TO BE ADDRESSED AND RESOLVED REF: TM 5344

DD-55

1. The Lot sizes are inconsistent with the Ramona Community Plan. Lots should be a minimum of 4 acres adjoining Hwy. 67 and Highland Valley. This allows animal keeping and septic systems that the current Specific Plan specifies.

Page 9

DD-56

2. The proposed Lot sizes along Highland Valley Rd and Hwy 67are inconsistent with the surrounding neighborhood of 2 and 4 acres. The proposed lot sizes are not compatible with the current rural character of the adjoining neighborhoods.

DD-57

3. As proposed on TM 5344 the lots present an 'urban tract' home appearance at the entrance to the rural Ramona valley destroying our Rural Character on arrival.

DD-58

4.. There are Hammer Head Lots within the subdivision: Lots 15, 25, 26, 33, 40, 77, 81, 82, 86, 95, and 116 are all Hammer Head Lots. They are not generally allowed and are not consistent with planning principles within the General Plan Elements. Removal of the

DD-46
The comment quotes the Project EIR in that Impact TR-3a, the cumulative impact at SR 67 between Poway Road and Archie Moore Road, would be significant and unavoidable. This and all other significant and unavoidable traffic impacts are stated in Section 2.1.6 and in Table S-1. No response is required.

DD-47
The traffic analysis assumes a reasonable trip distribution breakdown of residents commuting to employment centers, including to urbanized areas of San Diego to the west, going to school, shopping, and making other miscellaneous trips. However, the rest of the comment is unclear related to the adequacy of the Project EIR. When preparing regional documents, such as the Regional Transportation Plan or other type of plans, SANDAG uses local land use plans and information to develop their documents. Because the proposed project is designated as a SPA in the County General Plan and Ramona Community Plan, the project has been included in SANDAG planning efforts.

DD-48
Refer to Response to Comment T-2.

DD-49
The traffic analysis includes vehicle trips that would typically occur from a residential area, including those going to and from school and the destinations (location of the schools). Therefore, the trip distribution for the project includes those entering the Ramona Town Center area. No response regarding “schools and safety” can be made due to the lack of clarity in the comment.

DD-50
Refer to Response to Comment S-2.

DD-51
Refer to Responses to Comments T-2 and V-24.

DD-52
The comment seems to state that the project would impact dairies and egg ranches. No dairies or egg ranches occur onsite. None are presently active adjacent to the site. A small herd of cattle is grazed throughout part of the year on the property as well as on the adjacent Hardy Ranch. The loss of the agricultural land on the Cumming Ranch site was analyzed in the EIR and found to be less than significant in Section 4.1.3. The development of the proposed project would not adversely impact the ability of agricultural operations to continue or expand throughout other areas of the local community.

Furthermore, both the 2008 and 2009 County Crop Reports show that a majority of agricultural production in San Diego County occurs on property that is between 1 and 9 acres in size (68 percent both years), with the median acreage remaining at 4 acres. Both the San Diego County crop reports and the County Agricultural Guidelines document that economically viable agricultural production has existed for many years on small lot sizes, with 77 percent of the farmers living on the same property as the agricultural operation. Based on the 2008 and 2009 County Crop Reports, 68 percent of farmers operate farms on lot sizes less than 10 acres. Further, within the project vicinity, there are existing 1- to 9-acre lots that contain both residential and agricultural production, which by their existence supports the conclusion that small-family agricultural activities, such as gardens, grapes, and tree crops, would be feasible within the residential lots.

DD-53
The proposed project site currently does not produce or provide fresh produce or locally grown food. Small family agriculture, such as gardens that produce food or keeping chickens for fresh eggs, would be feasible within the residential lots and is encouraged by County policies (see Response to Comment DD-52).

DD-54
Refer to Response to Comment T-2.

DD-55
The General Plan Amendment (GPA) has been withdrawn and the project is consistent with the General Plan. Refer to Response to Comment T-2 for compatibility with the rural community and Response to Comment V-24 for a discussion of animal keeping.

DD-56
Refer to Response to Comment T-2. Land Use, Section 4.1.4 of the EIR, provides an analysis of the project's compatibility with the surrounding community.

DD-57
While it is true that the visual environment of the project site would be altered by the project, the Project EIR concludes that visual impacts would be less than significant from the proposed project to motorists on SR 67 as they enter the Ramona community. Please see Response to Comment T-7.

DD-58
With approval of the proposed GPA required as part of the project, the lots as proposed would be allowable in size and density. The project does not propose the use of septic systems. The project has a service availability letter from RMWD, indicating service is reasonably expected to be available within 5 years such that, pending approval of the service boundary extension by LAFCO and

granting of a service commitment agreement with RMWD, service will be provided.

Additionally, lots 15, 25, 26, 33, 40, 77, 81, 82, 86, 95, and 116 are panhandle lots, not hammerhead lots. All lots conform to the regulations governing panhandle lots as specified in County's Subdivision Ordinance Section 81.401.(f). The Subdivisions Ordinance requires a minimum 24 feet of frontage on a dedicated road or easement, except where the panhandle portion of two panhandle-shaped lots are adjacent to one another, in which case each shall have a minimum frontage of 20 feet. The lots identified by the commenter conform to these regulations.

DD-58 cont

Hammer Head lots will allow larger lots to be created. These larger lots can and must be served by Septic Systems.
5. Lots numbers 47, 48, 64, 65, 66, 67, 78, 106, 107, 118 and 119 within the Subdivision do not conform to the Ratio allowed within the County Guidelines and must be adjusted therefore allowing for larger lots with septic systems now able to be used.

DD-59

6. The Lot Size along the northern border or the Project that join Voorhes Ln. are not compatible with the adjoining neighborhood. All proposed bordering Voorhes Ln. must be 10 acre minimum to be consistent with the existing rural character of the nearby neighborhood. This would allow Septic System to be used .

DD-60

QUESTION: The Project DEIR offers no visible or described access to the Open Space Areas B or C. How are the responsible Park Rangers or Law Enforcement able to monitor activities by the public within the preservation area and/or trail component of the Project?

DD-61

7. The adjacent County Parks (Hardy Ranch) 70 acres that is managed by the County Parks has no legal access and has no legal description or access within the TM 5344.
8. The TM does not list the impacts of these public areas for the monitoring, safety and preservation of the dense area of existing Eucalyptus Trees within the 70 acre grove managed by San Diego County Parks

DD-62

9. The areas described in comment #6 are subject to vandalism and trespass that create a burden on the surrounding neighborhoods.
A. The DEIR OMMITS attention to the need for quick response to activities by trespass or dangerous activities within the public access to open space area i.e.: fires, public vandalism, people smoking and unmonitored access by individuals who would now have a clear and unobserved access to the Santa Maria Creek for illegal activities and the Ramona Airport that poses a threat to Homeland Security.

CLOSING COMMENTS

DD-63

1. The Decision Makers, The Board of Supervisors, have a responsibility to the Health Safety and Welfare for the citizens of San Diego County. I understand from their recent interviews on Public Television, that "SAFETY is their number one mandate from the people" and all five Supervisors said they support it. APPROVING MORE DENSITY IN THE RURAL AREAS OF SAN DIEGO COUNTY IS NOT SUPPORTED BY

Page 10

CALIFORNIA STATE LAW OR BY THE SAN DIEGO GP 2020 UPDATE.

DD-64

2. The pending URBAN projects proposed for Ramona remain a threat to the Health, Safety, and Welfare of the residents of Ramona. The General Plan 2020 Update must follow the recommendation to: PLACE URBAN GROWTH near the current URBAN CENTERS WITH TRAFFIC INFRASTRUCTURE TO SUPPORT IT. WORK PLACES TO SUPPORT IT. URBAN DEVELOPMENT IN RURAL AREAS pose a safety threat to Ramona residents and to other residents that live in areas accessed through Ramona. Level of Service E/F on Hwy 67 threaten the safety of the citizens of other Board of Supervisors Districts 1, 2, 3, & 4 as their residents and the general public travel to and through Ramona to recreational areas in Ramona, The Cleveland National Forest and San Diego County dessert communities and recreational areas.

DD-65

3. LAFCO and RWQCB, may not approve Cumming Ranch or Montecito Ranch Projects. These Projects may not be able to go forward as approved by the Board. The Cumming Ranch requires Sewer Extension and major improvements to the Santa Maria Treatment Plant. These improvements are unfunded by the RMWD and extremely expensive to the developers who will need this service. Sewer may be required by Montecito Ranch if the RWQCB does not approve that Package Treatment Plant.

DD-59

The commenter's desire for lots of 10 acres along Voorhes Lane is noted. However, the lots that border the Cumming Ranch property along Voorhes Lane are compatible with the proposed lots because the widths of the existing lots bordering the project are similar to the adjacent offsite lots with seven existing lots on the north side of Voorhes Lane and six lots shown on the project site. The widths of the lots north of Voorhes Lane range from 160 feet to approximately 325 feet, and the widths of the proposed Cumming Ranch project place rear lots ranging from 208 feet to 465 feet along Voorhes Lane. There is also a landscape buffer incorporated into the rear of the lots bordering Voorhes Lane. The proposed residential lots range in size from 2.0 to 2.1 acres, being compatible in size and character with the surrounding area. Refer to Section 4.1.4 for further analysis of consistency with rural land use character and the rationale for the less than significant conclusion. Also refer to Response to Comment T-2. Note that the existing lots fronting the project on Voorhes Lane exceed the width-to-length ratio set by the Subdivision Ordinance (1:3 ratio). All fronting residential lots are at a 1:4 or 1:8 width-to-length ratio, placing acreage in long narrow back yards. Overall, these lots are compatible in character to the 2-acre adjacent lots of the project.

DD-60

The trails and pathways provided by the project would be accessible in multiple locations. The trail system could also be accessed by the public roads and pathways through the proposed residential development or through Hardy Ranch. Law enforcement would also take access through these locations. Minimal law enforcement is anticipated for activities along the passive trail system.

DD-61

The proposed project would not impede access to/from the Hardy Ranch property because Hardy Ranch would continue to have access from Highland Valley Road and Rangeland Road to the west. The Cumming Ranch Tentative Map identifies a trail segment that would go from Area A through the Hardy Ranch property to Area B, which is consistent with the adopted Ramona Community Trails and Pathways Plan and the Public Access Plan for the Ramona Grasslands Preserve (in progress). DPR owns the Hardy Ranch and is aware of the environmental resources on that site. There is an existing trail of adequate width on the alignment of the Cumming Ranch trail that goes through the eucalyptus. Impacts, both direct and indirect, from trail use are considered in the Project EIR in Section 3.1 and potential impacts to biological resources and in Appendix P, Golden Eagle Survey and Assessment, were determined to be mitigable. It is not anticipated that public access will impact the monitoring, safety, and preservation of the dense area of existing eucalyptus grove. The eucalyptus grove will be managed pursuant to a Vegetation Management Plan

for the Ramona Grasslands Preserve (in progress). Management proposed includes thinning of the grove and removal of saplings. Mitigation Measure M-BI-17, which includes requirements for limited building zones, fencing, signage and the resource manager's responsibility to manage and monitor access and use of open space and trails as well as education of homeowners regarding prohibitions and sensitive resources, provides mitigation to reduce potential impacts due to the operation of the project, including trail use, to less than significant.

DD-62
The County acknowledges that vandalism or other illegal activities are always a possibility along trail systems. Minimal problems are anticipated with the development of a trail network that is accessible only by passive users with no motorized access. Law enforcement would be provided through the Ramona Sheriff Substation if necessary. The development of the trail system through the open space areas is in accordance with the Ramona Community and Trails and Pathways Plan and the San Diego County Trails Program Community Trails Master Plan and would serve to implement the goals of the County trails network. Area C, including the planned trail staging area, will be donated at the final map stage to the County. It is noted that the County may relocate the staging area to better meet the needs of the overall trail network in the area.

Since the previous response was provided, the FEIR has been revised to remove the staging area from the project. Thus, the last two sentences of above response should be stricken.

DD-63
The comment does not address the analysis presented in the Project EIR. It should be noted that the project would decrease both the density and the actual number of residential units to be built on the site as compared to the existing SPA (0.18 proposed as compared to 0.25 du/ac currently allowed; 125 units proposed as compared to 166 currently allowed) and remove the industrial component. Furthermore, the project is consistent with the General Plan update Land Use Map that was adopted by the Board of Supervisors on August 3, 2011. See Section 1.5 of the Final EIR for additional information on the consistency with the updated General Plan.

DD-64
The project does place the residential development near existing urban centers as the Ramona Town Center is immediately adjacent to the project site. The project also locates the residential development near major transportation corridors in the area, including SR 67 and Highland Valley Road. Please see Response to Comment S-2 regarding traffic and safety along SR 67 and improvements that would result from implementation of the project.

DD-65
It is correct that LAFCO and RMWD approvals are necessary for implementation

DD-66 4. Hwy 67 will remain a 'F' designation, "Significant and Unavoidable". The density proposed by more development of an Urban nature in agricultural lands will be responsible for more traffic and accidents caused by frustrated or irresponsible drivers and inexperienced drivers.

DD-67 5. More harm than good is the result of extension of urban development with Sewer Service in a rural, constrained community in order to provide the density's proposed. The Proposed Developments are unreasonable in today's environmental awareness. If these projects are approved there will be more accidents, more fatalities and more problems than money can not solve.

DD-68 6. The Cumming Ranch is requesting urban services in order to build in a wetland, watershed. It is not a compatible project with Ramona Community Goals. It should be rejected in its proposal and return with a Rural Development Project.

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CONDITIONS OF APPROVAL

DD-69
1. All residential Lots that border the Private Road, Voorhes Ln. are to be a minimum of 10 acres and accommodate septic systems. All lots within the Project to minimum 4+acres to accommodate septic systems.
2. All Lots bordering Voorhes Lane are to have a 20 ft. setback from the property line of the northern parcel APN 282-010-30-00.
3. The Project Home Owners Association (HOA) will be responsible for creating and maintaining the 20 ft Easement with vegetation to prevent water runoff onto the Private Road, Voorhes Ln.
4. The Project will Create a Natural Vegetation (non/toxic native plant) view shed within the 20 ft. Easement: Purpose: to shield the Voorhes Ln. rural residents from the adjoining lots and the public access on to trails within the project.
5. Fencing of 7 strands barbed wire, including hedge foliage, bordering Voorhes Ln. . is to be the responsibility of the Home Owners Association.
6. The intent of the fencing is to safely separate the subdivision of Cumming Ranch from entering or harassing the rural neighborhood of Voorhes Ln.
7. The project must create secured fencing along all public trails that border all private property with signs indicating "Private Property". NO PUBLIC ENTRANCE.

of the Cumming Ranch project. The Montecito Ranch project is a separate and independent project and approval of one project is not related to or dependent upon the other. See Response to Comment DD-44 regarding expansion of the SMWWTP.

DD-66
It is correct that significant and unavoidable traffic impacts were identified for the segments along SR 67 in the Project EIR. Please see Response to Comment S-2 regarding traffic and safety along SR 67 and improvements that would result from implementation of the project.

DD-67
This comment is unclear as to how it relates to the adequacy of the impact analysis. LAFCO will make the determination if the extension of sewer service is appropriate. The Project EIR identifies all environmental impacts that may result from implementation of the proposed project, including the extension of sewer service to the project site. No further response can be made.

DD-68
Please see Response to Comment DD-35 regarding the identification and mitigation of wetlands on the project site. The commenter's opinion is noted. No further response is necessary.

DD-69
The commenter's Conditions of Approval requests are noted and included for the decision makers to consider during their deliberations. The comment does not address the analysis presented in the Project EIR or other specific environmental issues. No response is necessary.

-----Original Message----
From: Vivian Osborn [mailto:vivstir@sv-mail.com]
Sent: Thursday, December 16, 2010 8:46 AM
To: Hofreiter, Larry; Ramaiya, Jarrett
Subject: Request confirmation of receipt Cumming Ranch Comments via e-mail

DD-70 Hello Larry and Jarrett. Just checking to see if e-mail came through.
I had no luck with attachment as my computer is altered since it got 'repaired'. No matter. Did it come through a few minutes ago? Is it readable? Vivian

DD-70
This email requests confirmation that the comment letter was received; it does not provide specific comment on the analysis provided in the Project EIR and no response is necessary.

From: Vivian Osborn [vivstir@sv-mail.com]

Sent: Friday, December 17, 20108:00 AM

To: Hofreiter, Larry

Subject: Re: Request confirmation of receipt Cumming Ranch Comments via e-mail

DD-71 Good morning Larry. Question: do the DPLU and DPW use 18 as the number of average daily trips (ADT's) per DU when calculating an impact for a development? Vivian

DD-71

This email requests information from County staff and does not provide specific comment on the analysis provided in the Project EIR and no response is necessary. As detailed in the traffic report, Appendix A to the Project EIR, the SANDAG trip generation rate of 12 trips per day per residence for an estate development of 125 dwelling units per acre was used.

Dennis and Dawn Rockwell
17241 Voorhes Lane
Ramona, CA 92065

RECEIVED
DEC 20 2010
DPLU - PPCC

December 16, 2010

Mr. Larry Hofreiter
County of San Diego - Department of Planning and Land Use
5201 Ruffin Road, Ste B
San Diego, CA 92123

Subject: Comments on the Proposed Cumming Ranch Project
GPA 03-007; SP 03-005; TM 5344; REZ 07-002, LOG NO. 03-09-028; SCH NO. 2004031136

Dear Mr. Hofreiter:

EE-1 In review of the DEIR for the Cumming Ranch Project I have significant concerns regarding the impact such a proposal could have on the community of Ramona. Specifically:

EE-2 1. The proposed project is not in keeping with the **rural community character** of the West End. Parcels in the adjacent and nearby surrounding areas are agricultural in nature with large animal-keeping, ranching, and dry-land farming. Parcels directly adjacent the project south of HV Road average 3.5 acres, parcels to the northwest of Area A average 10.7 acres, and the proposed 2020 General increases the minimum lot size to 10 acres north of HV Road. The Cumming Ranch Project proposal of an average lot size of 1.6 acre (suburban-like parcels), most devoid of large animal-keeping, is in stark contrast to the surrounding rural area and is inappropriate.

EE-3 2. **Degradation of transportation corridor**: Hwy 67, from Poway Road to Archie Moore and Highland Valley Road is already deemed Grade F (worst grade possible) by the county. Approving 125 new homes with 930 additional vehicle trips made each day, on the heels of the recently approved Montecito Project of 417 homes with 883 vehicle trips daily, will severely negatively impact an already heavily congested and dangerous roadway. The concern is both of bumper to bumper traffic during rush hour, and the prospect of more head-on collisions as people take chances passing (out of frustration). This is really a Public Safety Issue. There is no plan to upgrade the LOS F rating on Hwy 67 between Poway Road & Archie Moore or between Archie Moore & Highland Valley Road.

EE-4 3. **Loss of biological resources**. The hills, scrub, and grasslands/wetlands of Area A, in addition to the grasslands and riparian habitat of Areas B & C, are known foraging areas for numerous raptors, including the Golden Eagle, Bald Eagle, Red-Shouldered hawk, Ferruginous hawk, Coopers hawks, White-tailed Kites, Turkey Vultures, Red-tailed hawks, Kestrels and owls, to name a few. In fact, Area A was once used as a prime viewing area for the local hawk-watch group. It is preposterous to think that the proposed small islands of "open space" amidst clusters of suburban type dwellings/parcels will remain safe and useful forage and nesting areas to wildlife. Loss of this forage/nesting habitat means a loss of vital biological resources for both the community of Ramona and for the County of San Diego.

EE-5 4. **Growth inducement & habitat/waterway degradation**. Inclusion of a sewer system to serve the proposed development clearly paves the way for major development on the west end of Ramona resulting in the blockage of wildlife corridors. Additionally, construction for sewer connection would occur directly thru the heart of the Ramona Grasslands. Sewage lines will cross sensitive waterways with potential of sewage spill into the Etcheverry and Santa EE-6 Maria drainage systems, and thru a well-known major floodplain. This water not only feeds the aquifers & wells of surrounding properties downstream, but also flows into Lake Hodges – a municipal water supply.

EE-7 5. Lastly, from an **aesthetics** point of view, entrance into Ramona is officially designated at the Hwy 67 - Highland Valley Road interchange with a hand-crafted metal welcome sign displaying the setting of Ramona: horses, raptors, mountains. Placement of one-acre residential lots approaching this entrance sign would contradict the historically equestrian nature & expansive openness that is Ramona. These homes would also not be in keeping with the County's designation of Hwy 67 as a "Scenic Highway".

Sincerely,

Dennis and Dawn Rockwell

Dawn L Rockwell
Dennis D Rockwell

Letter EE
Dennis and Dawn Rockwell

EE-1
Comment EE-1 contains introductory statements and does not raise a specific issue regarding the environmental analysis provided in the Project EIR. No response is necessary.

EE-2 – EE-7
Refer to Responses to Comments T-2 through T-7 for responses to identical comments.

From: Rick & Wanda Crook [mailto:crookw-r@att.net]
Sent: Monday, December 20, 2010 2:30 PM
To: Ramaiya, Jarrett; Hofreiter, Larry
Subject: Timothy Sage Comments on Cumming Ranch DEIR

Hello Jarrett, Larry:

FF-1 A neighbor of mine, Timothy Sage, does not have a computer, so he asked me to email his Cumming Ranch DEIR to you. Please find his "signed" letter attached.

Respectfully,

Rick Crook

Letter FF
Timothy Sage

FF-1
This comment is an introduction to the attached letter and does not raise a specific issue regarding the environmental analysis provided in the Project EIR. No response is necessary.

Mr. Larry Hofreiter December 20, 2010
County of San Diego - Department of Planning and Land Use
5201 Ruffin Road, Ste B
San Diego, CA 92123
Subject: Comments on the Proposed Cumming Ranch Project
GPA 03-007; SP 03-005; TM 5344; REZ 07-002, LOG NO. 03-09-028; SCH NO. 2004031136
FROM: Timothy Sage, 17276 Voorhes Ln., Ramona, CA 92065

Dear Mr. Hofreiter:

FF-2 In review of the DEIR for the Cumming Ranch Project I have significant concerns regarding the impact such a proposal could have on the community of Ramona. Specifically:

FF-3 1. The proposed project is not in keeping with the **rural community character** of the West End. Parcels in the adjacent and nearby surrounding areas are agricultural in nature with large animal-keeping, ranching, and dry-land farming. Parcels directly adjacent the project south of HV Road average 3.5 acres, parcels to the northwest of Area A average 10.7 acres, and the proposed 2020 General increases the minimum lot size to 10 acres north of HV Road. The Cumming Ranch Project proposal of an average lot size of 1.6 acre (suburban-like parcels), most devoid of large animal-keeping, is in stark contrast to the surrounding rural area and is inappropriate.

FF-4 2. **Degradation of transportation corridor**: Hwy 67, from Poway Road to Archie Moore and Highland Valley Road is already deemed Grade F (worst grade possible) by the county. Approving 125 new homes with 930 additional vehicle trips made each day, on the heels of the recently approved Montecito Project of 417 homes with 883 vehicle trips daily, will severely negatively impact an already heavily congested and dangerous roadway. The concern is both of bumper to bumper traffic during rush hour, and the prospect of more head-on collisions as people take chances passing (out of frustration). This is really a Public Safety Issue. There is no plan to upgrade the LOS F rating on Hwy 67 between Poway Road & Archie Moore or between Archie Moore & Highland Valley Road.

FF-5 3. **Loss of biological resources**. The hills, scrub, and grasslands/wetlands of Area A, in addition to the grasslands and riparian habitat of Areas B & C, are known foraging areas for numerous raptors, including the Golden Eagle, Bald Eagle, Red-Shouldered hawk, Ferruginous hawk, Coopers hawks, White-tailed Kites, Turkey Vultures, Red-tailed hawks, Kestrels and owls, to name a few. In fact, Area A was once used as a prime viewing area for the local hawk-watch group. It is preposterous to think that the proposed small islands of "open space" amidst clusters of suburban type dwellings/parcels will remain safe and useful forage and nesting areas to wildlife. Loss of this forage/nesting habitat means a loss of vital biological resources for both the community of Ramona and for the County of San Diego.

FF-6 4. **Growth inducement & habitat/waterway degradation**. Inclusion of a sewer system to serve the proposed development clearly paves the way for major development on the west end of Ramona resulting in the blockage of wildlife corridors. Additionally, construction for sewer connection would occur directly
FF-7 thru the heart of the Ramona Grasslands. Sewage lines will cross sensitive waterways with potential of sewage spill into the Etcheverry and Santa Maria drainage systems, and thru a well-known major floodplain. This water not only feeds the aquifers & wells of surrounding properties downstream, but also flows into Lake Hodges – a municipal water supply.

FF-8 5. Lastly, from an **aesthetics** point of view, entrance into Ramona is officially designated at the Hwy 67 - Highland Valley Road interchange with a hand-crafted metal welcome sign displaying the setting of Ramona: horses, raptors, mountains. Placement of one-acre residential lots approaching this entrance sign would contradict the historically equestrian nature & expansive openness that is Ramona. These homes would also not be in keeping with the County's designation of Hwy 67 as a "Scenic Highway".

Respectfully, I agree with the above letter

FF-2
Comment EE-1 contains an introductory statement and does not raise a specific issue regarding the environmental analysis provided in the Project EIR. No response is necessary.

FF-3 – FF-8
Refer to Responses to Comments T-2 through T-7 for responses to identical comments.

From: Richard Van Metre [mailto:pmsdh3@gmail.com]
Sent: Friday, November 12, 2010 9:56 AM
To: Hofreiter, Larry
Subject: Cumming Ranch Project

Dear Mr Hotreiter,

GG-1 I received a notice from the SD Dept.of Planning and Land Use indicating that you are the source for additional information about the subject project. Since I own property in the area I was wondering how the project plans to handle/treat waste water from the homes to be built there. Any information you can give me or this subject would be appreciated.

Thank you for your help.

Richard Van Metre
619-466-1121

Letter GG
Richard Van Metre

GG-1
The project is not within the Ramona Municipal Water District (RMWD) for sewer, but RMWD has provided a Project Facility Availability Form dated April 25, 2011, for service to be reasonably expected within the next 5 years. The project is within the sphere of influence for the RMWD and LAFCO must approve the expansion of service. The project proposes that wastewater generated by the proposed project would be conveyed by a new pipeline to the adjacent Santa Maria Waste Water Treatment Plant (SMWWTP) for treatment. RMWD envisions that the Cumming Ranch project would be within the second phase of SMWWTP expansion. Effluent generated by the SMWWTP is subject to the RMWD policy that reclaimed water be used in designated areas consistent with legal, safety, and environmental requirements. While RMWD may mandate construction of reclaimed water distribution systems in new developments, the Cumming Ranch project does not meet the RMWD policy because of its environmental sensitivity and the easement prohibitions required for protection of the biological and cultural resources. Refer to Section 3.6 of the EIR for the description of the proposed wastewater system and analysis of sewer service. Figure 1-11 of the Project EIR shows the proposed sewer system.

Lori Vering
1305 Ashley Rd.
Ramona, Ca 92065

County of San Diego Planning Department
5201 Ruffin Road, Suite B
San Diego, CA 92123

Re: Cumming Ranch Project: GPA 03-007, SP 03-005, TM 5344, STP 10-007, REX 07-002, LOG No. 03-09-028, SCH No. 2004031136

Dear Larry Hofreiter,

HH-1 As a long-time resident of Ramona, I have experienced firsthand the growing pains of a small community and believe that the rural character which I value will become a thing of the past. The Cummings Ranch project area is adjacent and connected to the Ramona Grasslands which is an important environmental area to animal and plant species. In the current economic times of foreclosures and sufficiently reduced residential resale, I do not feel that additional residential project is necessary. Ramona and San Diego is not experiencing a residential shortage.

HH-2 The Draft Environmental Impact Report (DEIR) is insufficient in analyzing the environmental impacts the community and biological impacts. A global comment that the project should be subject to the Draft General Plan, as it will most likely not be constructed prior to the Draft GP approval. The following statements are inconsistencies and issues that I identified in the document.

Land Use

HH-3
1. A general plan amendment from 2-4 acres to 1.0-3.1 is proposed for the project. EIR analyzes the land use designation for the current General Plan (GP) and not the Draft General Plan. The Draft GP identifies the project area as a new land use designation of Semi-rural residential with a dwelling unit of one per 10/20 acres. The current GP lists the project area as multi-rural use 1 du 4,8,20 and intense agriculture 1 du 2, 4, 8.

Traffic

HH-4
1. Traffic report was conducted in 2004, completed in 2007 and updated in 2008. When were the traffic counts conducted? This report should be considered out of date. A new traffic report should be conducted to adequately identify the current traffic counts for the area to analyze the project impacts.

HH-5
2. Appendix H of the Traffic report does not list the cumulative projects, but states it is "on file with the County of San Diego." This should be considered unacceptable as traffic is considered a cumulative impact and the remaining projects should be properly identified.

HH-6
3. The traffic report does not analyze the area roadways as evacuation routes. This is a traffic issue and a safety issue that should be included in either the traffic section or hazard section.

HH-7
4. Wildcat Canyon Road is not included in the traffic report. This should be included as it is considered an evacuation route in the event of an emergency and would be affected by the additional residents to the area.

Letter HH
Lori Vering

HH-1
This is an introductory comment and does not specifically address the analysis presented in the Project EIR. The comment regarding the project's location and its importance is noted. The commenter's opinion regarding the need for the project is acknowledged and is included in the project's Final EIR for the decision makers to consider. No additional response is necessary.

HH-2
The "global comment" is a general comment related to the EIR analysis for community character, biological resources, and consistency with the recently adopted General Plan. No specific response can be provided.

HH-3
According to Board of Supervisors Pipelining Policy, applications for new Plan Amendment Authorizations (PAAs), and any associated approvals that were deemed complete on or before August 3, 2003, were to be processed under the General Plan that was in effect at that time. The Cumming Ranch PAA was deemed complete on July 21, 2003, so it qualified for "pipelined" status. However, following adoption of the General Plan Update, County staff determined that the proposed Cumming Ranch project in its entirety complied with the General Plan. Prior to adoption of the plan, the Cumming Ranch General Plan Amendment was proposing to amend the Ramona Community Plan, which specified a 2- and 4-acre minimum lot size. The General Plan Amendment was proposing to allow the project to have lot sizes between 1 and 3.1 acres. However, the General Plan Update removed the minimum lot size requirements from the Ramona Community Plan. Additionally, the project complies with the updated policies in the General Plan. For example, the Conservation Subdivision program requires subdivisions to be located in areas that minimize impacts to environmental resources, and it requires development to be consolidated to the maximum extent permitted by County Regulations and the applicable Community Plan. The Cumming Ranch project accomplishes this by transferring density from the areas designated as SR-10 and RL-40. It designates the SR-10 and RL-40 areas as open space, and places the allowed units in the least sensitive areas, (e.g., closer to Highland Valley Road, which is designated as SR-2). Additionally, the project complies with the updated policies within the General Plan Noise Element and Ramona Community Plan. The previous Ramona Community Plan included an acceptable noise threshold of 55 dBA CNEL for new developments, which was more restrictive than the Noise Element requirement of 60 dBA CNEL. The EIR evaluated noise level exposure levels for both 55 dBA and 60 dBA CNEL. With the implementation of the General Plan Update, the Ramona

Community Plan no longer requires the 55 dBA CNEL, and the current Ramona Community Plan noise requirement refers to the General Plan Noise Element requirement of 60 dBA CNEL. The project is consistent with both the General Plan Update Noise Element and Ramona Community Plan. Therefore, the General Plan Amendment is no longer needed because the proposed project complies with densities identified on the updated General Plan Land Use Map, as well as the policies prescribed in the General Plan and Ramona Community Plan. Please note that the General Plan Land Use Map that was in effect at the time of application designated the area as a (21) Specific Plan Area, not Multi-rural Use or Intense Agriculture.

HH-4
Please refer to Response to Comment Z-11.

HH-5
Cumulative traffic impacts were analyzed in the Traffic Report and the Project EIR in Section 2.1.4. The list of projects used for the cumulative traffic analysis was part of a much larger study evaluating traffic in the Ramona area. This large report was not reproduced as part of the Traffic Report but was made available to the public at the County offices (Ramona cumulative traffic compilation report, July 26, 2004). The following is a description from the project Traffic Report regarding the compilation of cumulative projects used for analysis:

A cooperative study was prepared in 2004 by local Traffic Engineers preparing studies for other projects in the Ramona area. The intent of this cooperative study was to assemble all cumulative projects and distribute their projected traffic onto the existing roadway network. A total of 60 "cumulative" projects were identified and included. Projected traffic for the Cumming Ranch project is included in the study. It should be noted that the list of cumulative projects is constantly changing with project completions, new projects and project withdrawals. To accommodate this "fluid" nature, a growth factor of 10% was added to the numbers shown in the cooperative study for this analysis. We recently updated the 2004 cumulative project list to remove 37 "constructed" and "withdrawn" projects and add new projects. This included an additional 67 projects which were included in the analysis. The results revealed that the 2004 cumulative projects numbers with the 10% growth factor added resulted in higher projected traffic volumes than the current list provided by County staff and therefore will be used in this study to provide a more conservative analysis...

HH-6
Refer to Response to Comment Z 14.

HH-7

Traffic reports do not address evacuation routes or evacuation traffic (see Response to Comment L-3). Furthermore, the Ramona Community Protection and Evacuation Plan shows the project site in an area that would typically evacuate to the west on SR 67. Evacuation to Wildcat Canyon Road would be highly unlikely for wildfire, the most common cause for evacuation, because wildfire most often occurs in Santa Ana conditions (high winds coming from the east). If Wildcat Canyon Road was needed as an evacuation route, OES and the Sheriff would direct the timing, direction, and flow of traffic to provide the safest evacuation for residents.

HH-8

5. The traffic report does not analyze the Draft GP transportation section. SR-67 between Poway and Ramona is determined as not available for expansion in the SD County Draft GP. Page 4.35 of the Draft GP lists SR-67 as accepted road classification with a level of service (LOS) of E/F and "adding travel lanes do not justify the resulting of increased traffic capacity."
    a. Identified roads in the Draft GP:
        i. Poway to Scripps Poway Pkwy.
        ii. Scripps Poway Pkwy to Mapleview Road (Lakeside)
        iii. Mussey Grad to Highland Valley Road
        iv. 11th Street to Pine

Six out of ten designated state routes listed in the Draft GP are located in Ramona.

HH-9

Cumulative impacts are not sufficiently analyzed in the County Draft GP (pg 2.15-64 and 2.15-83). Even if the EIR included the Draft GP, the impacts are not sufficiently analyzed either.

HH-10

6. Mitigation of payment into the County Traffic Impact Fee (TIF) cannot mitigate for SR-67. This roadway is not scheduled for widening or upgrades in the foreseeable future. This should be enough for the project not to be approved. The residents of Ramona should not be subject to addition trips until this state route has had sufficient upgrades.

HH-11

7. Page 2-3 does not list any state or federal policies. Considering the impact roadway is a state highway, state policies should be included.

HH-12

8. The Board approved the Montecito Ranch project of an additional 417 homes almost a year ago. The additional 125 homes will have a sufficient cumulative impact the traffic to the area. This traffic impacts are a nuisance on a day to day basis, extending commute times by 15 to 30 minutes a day, but when a wildfire occurs in the area, it is catastrophic. There have been two major wildfires in this area over the last 6 years, in which the Witch fire evacuation was not possible due to the amount of cars evacuating at the same time and limited amount of open roadways. Ramona only has four options to access major freeways for evacuation purposes. Two state highways (SR-67 & SR-78) and two county roadways (Wildcat Canyon & Highland Valley Road). These roadways are not sufficient to safely serve the community.

Biological

HH-13

1. Fairy Shrimp survey was conducted in 2002 and 2003, report is out of date.
2. Quino Checkerspot Butterfly was conducted in 2004, with a habitat assessment survey conducted in 2001. Reports are out of date. Appropriate habitat and host plants were identified on-site. Additional surveys should be conducted to sufficiently access if QCB larvae are present onsite. Insufficient analysis conducted.
3. Arroyo Southwestern Toad survey conducted in 2001. Report is out of date.
4. Although Gnatcatchers were not identified during the GAGN survey, species have been identified by the Wildlife Research Institute located adjacent to the Cummings Ranch project.
5. Stephens' Kangaroo Rat survey was conducted in 2000. This survey is ten years old and should be considered out of date.

HH-14

6. Considering the project area is located adjacent to the Ramona Grasslands, sufficient survey was not conducted for Golden Eagles and raptor type birds. A Golden Eagle survey should be required.

HH-8
The comment is unclear regarding the specific traffic issue of concern and this response attempts to respond as best understood. Please see Response to Comment HH-3, which clarifies that the project is consistent with the General Plan. Refer to Response to Comment S-2 for a detailed discussion of future plans related to traffic conditions on SR 67. Please note that the EIR identified significant unavoidable impacts to segments of SR 67 due to the lack of feasible mitigation to improve traffic conditions.

HH-9
The comment addresses cumulative analysis provided in the County's General Plan Final EIR, which is has been certified. The comment does not specify how the cumulative impact analysis in the Project EIR is not adequate. No additional response is necessary.

HH-10
The EIR identifies the significant cumulative impacts identified in the comment as detailed in Section 2.1.4. The EIR acknowledges that payment of Transportation Impact Fees (TIF) would not mitigate traffic impacts along the portion of SR 67 in the city of Poway and states that this impact would remain significant even with mitigation as explained in Section 2.1.6 for Impact TR-3a. County decision makers must consider this unavoidable significant traffic impact and findings of overriding considerations would be necessary if the decision was made to approve the project.

HH-11
Appropriate and applicable transportation policies are listed within Section 2.1.1 of the EIR. The listed policies describe applicable regulations for the environmental analysis of the traffic impacts. The comment does not specify what additional state policies would be necessary to add to this section.

HH-12
The Montecito Ranch project was included in the list of cumulative projects used for the traffic analysis. Please see Response to Comment Z-14 regarding emergency evacuation.

HH-13
Please see Response to Comment A-9 of the U.S. Fish and Wildlife letter regarding updated biological surveys for the species listed in this comment.

HH-14
Please see Response to Comment A-8 of the U.S. Fish and Wildlife letter regarding surveys for golden eagles that have occurred since publication of the Draft EIR.

HH-15 7. The construction of the proposed project would create fragmentation of wildlife corridors. The fragmentation of the draft North County MSCP and the MSCP are not connected. Fragmentation will occur with the removal of the portion of the project adjacent to SR-67.

HH-16 8. The preservation of this single component of Area C and Area B are insufficient mitigation regarding the edge effects that the Proposed Project will have the watershed/wetland natural capital resources of Ramona and San Diego County. The DEIR fails in its purpose by excluding viable attention to this component. The DEIR must include all the data available or it is insufficient. The onsite mitigation appears to be 'double dipping' in its claims for mitigation by preservation of Area A Residential and Open Space.

Fire

HH-17 1. Appendix K, Fire Protection Plan, Section 3.6, Cumulative Impact Analysis states that the Cummings Ranch the HOA can demonstrate the ability to withstand catastrophic wildfire impacts. This is an inaccurate determination. The traffic impacts have not been sufficiently analyzed to contain sufficient emergency access routes. In addition, during the Witch fires, the RWD experienced a power outage in which water pumps could not be operated. This was not analyzed in the FPP. Determination of less than significant is considered inadequate.

Agriculture

HH-18 1. Although the project does not contain any Prime, Farmland of Local Importance or Unique Farmland, the project does contain prime soils. The agricultural report does not adequately analyze prime soils located on the project site.

HH-19 2. The removal of any agricultural land on a cumulative basis should be considered significant. Ramona is experiencing a dramatic reduction in agricultural lands due to residential subdivisions. Cumulative significant impact determination should be considered significant.

Cultural

HH-20 1. Cultural Section does not identify regulatory guidelines.

Hazards

HH-21 1. No discussion of fire evacuation is discussed in either the hazard or traffic section. Although not called out under CEQA, this is an area specific hazard and should be analyzed as such.

HH-22 2. Phase I Environmental Site Assessment was conducted 1995 and updated in 2006, this report is four years old and is out of date.

Noise

HH-23 1. Noise section does not address the Draft GP in the applicable plans and policies. Noise report December 2008 and needs to be updated. Mitigation of lot specific noise barriers in the form of walls would be considered an aesthetic visual impacts and not address in the aesthetic section.

HH-24 2. The EIR fails to address the noise generated from the proposed sewer lift station, stating admission of no data. Additional noise analysis would be required.

Visual

HH-25 1. The project proposes no street lighting due to night light sky impacts. Is this consistent with the County requirements?

HH-15
This comment is unclear relating to the adequacy of the EIR. Refer to the Biological Technical Report and the EIR, Section 3.1.1, for a description of the wildlife corridors on the project site. Impacts were found to be less than significant due to the project design avoidance of wildlife corridors. Also see Response to Comment B-25.

HH-16
Area B and Area C are proposed for open space with some of these areas being mitigation for the development in Area A. Area A also has several open space lots (G, I, and J) that have the appropriate size and connectivity to be mitigation for the development. In addition, an RMP will be implemented to provide monitoring for edge effects and take corrective actions, as necessary. The comment does not clarify or specify how the required mitigation is not sufficient nor does the comment specify what information or data are believed to be missing. The project provides for the preservation of mitigation acreage at the required ratios and does not "double-dip" as indicated by the comment.

HH-17
Please see Response to Comment Z-14 regarding evacuation. Failure of the community water supply affects fire fighting capability throughout the District, not just within a tract. The ability of the project to safely withstand a wildfire event is primarily based on the project's Fire Protection Plan and meeting applicable fire regulations (County Building Code Chapter 7A, County Fire Code), not on water supply or the ability to pump water for fire suppression. The design of the project includes measures such as ignition resistant construction, defensible space, vegetation management, multiple access locations, and appropriate cul-de-sac distances, among others (Appendix K of the EIR). In addition, the project has been coordinated with the Ramona Fire Marshall and meets service response (travel time) requirements. Because the project design minimizes the potential for wildland fire to initiate on site and move through the area, fire risk is also reduced for the neighborhood.

The Fire Protection Plan and County regulations prepare homes and new tracts to resist wildfire and give the best level of protection available today to survive wildfire—and to do so even absent fire suppression forces or municipal water supply on scene. The project has implemented all applicable fire protection measures mandated in current code and is fire safe.

HH-18
The comment is noted. The EIR states on page 4-30 that there is 142 acres of prime soils interspersed throughout the project site. Since the publication of the Draft EIR, additional agricultural analysis was completed to address LAFCO policies and is included in Section 4.1.3 of the Final EIR. The analysis

determined that the project was consistent with the LAFCO policies. Refer to Response to Comment I-9.

HH-19
The project's potential impact on agricultural resources was addressed in Chapter 4.1.3 of the EIR in regard to three significance guidelines described in Chapter 4.1.3.2. Potential direct and cumulative impacts were determined to be less than significant.

HH-20
The comment is noted. This information was provided in the Cultural Resources Technical Report (Appendix E). A reference to this information has been provided in the Final EIR. The addition of this information does not change the analysis or conclusions of the cultural resources section.

HH-21
Please see Response to Comment Z-14 regarding emergency evacuation. No current laws, ordinances, or policies require development projects to prepare project-specific evacuation plans. Evacuation plans, unlike Fire Protection Plans, do not have the potential to affect the design of a project, so they would not affect the CEQA analysis of a project. Evacuation plans are not prepared only for fire danger, but all types of dangers, including but not limited to earthquakes, dam failure, hazardous spills, and acts of terrorism, and take into consideration all ages of the population, animals, and more. These types of plans are also generally prepared on a community-wide basis and require the assistance of many agencies. The Office of Emergency Services has a template that can be used and they offer assistance to districts wishing to create an evacuation plan.

HH-22
There is no need to update the Phase I Environmental Site Assessment as no changes have occurred on the project site that would alter the information identified in the report. Past uses of the site that may have involved hazardous materials would obviously be unmodified and no new uses of the site have occurred since completion of the report. Thus, environmental conditions identified in the report would remain accurate.

HH-23
Please see Response to Comment HH-3, which clarifies that the project is consistent with the General Plan Update. The Noise Report continues to be accurate and appropriate in evaluating environmental impacts as the noise conditions or noise generation sources on or surrounding the project site have not substantially changed since completion of the study. The potential aesthetic impact of noise barriers is addressed in the visual section of the Draft EIR on pages 3.4-14 and 3.4-15. A potentially significant impact (Impact AE-1) was

identified and mitigation is required (Mitigation Measure M-AE-1) that would reduce the visual impact to less than significant.

HH-24

The comment is noted. Due to the early planning stage of the sewer lift station, the exact equipment has not yet been determined. However, noise analysis of the sewer lift station was completed using appropriate noise generation levels from similar types of facilities to accurately model the noise that would result. This analysis found a potentially significant noise impact and mitigation is required. As detailed in Mitigation Measure M-N-6, a noise study is required as part of the Minor Use Permit to verify that the sewer lift station noise levels will be below the required standards under County Code (Noise Ordinance) or to require additional noise reducing measures to demonstrate these requirements are met.

HH-25

There are no County requirements for streetlights. Light sources at the homes would be subject to the requirements of the Light Pollution Code (San Diego County 2005b) for Zone B as well as the project design guidelines.

HH-26 2. Page 3.4-54 Visual character to change from vacant land to rural residential compatible to the surrounding residential. Just because you design the project with the contours of the geography does not reduce the visual impact to the viewer. Impact is significant and unmitigable.

HH-27 3. The rural character of the community was not adequately addressed. The removal of this large plot of land would substantially reduce the visual character of the area.

Public Utilities

HH-28 1. Project water usage dates used in the document are from 2005. Current water demands have changed dramatically over the past five years. Ramona has the highest water costs in the County and subject to stage 2 water alerts for the past two years.

HH-29 2. Page 3.6-6 identifies Ramona landfill has containing existing capacity. This facility is closed and not accepting additional solid waste. Current solid waste is transported to the Ramona Transfer Station and then to Miramar landfill.

HH-30 3. Current Ramona school enrollment is out of date and not accurate.

HH-31 4. The project would require a sewer extension and major improvements to the Santa Maria Treatment Plant. The Ramona sewage facility is currently beyond capacity. This was not sufficiently analyzed in the EIR. LAFCO and RWQCB have not approved the Cummings Ranch project and would be required for the development to occur.

HH-32 5. Any upgrades to the sewage facility would be considered growth inducing, as more residential construction would be allowed to occur. If the lot sizes were increased, septic sewer systems could be proposed.

HH-33 6. Ramona Water District is currently looking to use the Cummings Ranch Project for a spray field for the RWMD. This is not addressed in the EIR and would be required to have an additional EIR if proposed.

Cumulative

HH-34 1. Cumulative list identifies projects but does not sufficiently identify all project impacts. Out of 90 projects, 34 projects area identified as subdivision projects (subdivision of 3 or more). This would add an additional 790 additional residences to the community. This would have a sufficient cumulative impact on services, utilities, traffic, and biological resources.

HH-35 I am not in favor of the County of San Diego Board of Supervisors approving the Cummings Ranch project. This project is not in the best interest of the residents of Ramona and the environment impacts are sufficient that the project would have a substantial impact on the area residents and biological resources. The project poses a threat to the safety to the residents of Ramona and would reduce the community character that currently exists. I support a "No Build Alternative", and respectfully request that the Board of Supervisors do not approve this project in its present form.

Sincerely,

Lori Vering

Lori Vering

HH-26
As detailed throughout Section 3.4, the determination of significance for visual impacts included consideration of many design factors of the project, including the incorporation of the residential homes into the natural contours of the existing landforms, and the preservation of significant features including ridgelines, hilltops, boulders, and trees, incorporating large open space areas, and the grading and landscaping. In addition, the setting influences significance, with existing residential development and major roadways in the area. The Project EIR acknowledges that development of the project would substantially change the aesthetic environment of the site from open space to rural residential development; however, this change was found to be less than significant per the applicable guidelines of significance as detailed throughout Section 3.4.3.

HH-27
The comment does not specify how community character is not adequately addressed. Land use compatibility is discussed in Section 4.1.4 of the Final EIR and in Response to Comment T-2.

HH-28
It is acknowledged that water demand in the project area varies from year to year. The analysis of water supply and service has been coordinated with the Ramona Municipal Water District as recently as April 25, 2011. Refer to the attached Project Facility Availability Form (attached to these Response to Comments). Project water demand is considered in the Project EIR. Table 3.6-1 shows Ramona Municipal Water District (RMWD) available water supply and demand and Table 3.6-3 shows the projected water demand for the Cumming Ranch project. This information was calculated by RMWD in 2009 (RMWD 2009b), not 2005 as indicated in the comment. Project water demand was calculated to have an approximate average daily demand of 69,250 gallons per day. Both direct and cumulative impacts were found to be significant regarding water and sewer service. Mitigation Measures M-PS-2, -3, -5, and -6 require that approval of the Cumming Ranch project not occur until RMWD has provided a commitment of adequate supply and service availability for water and sewer.

HH-29
The comment is noted and the Final EIR has been updated regarding solid waste disposal. However, this information is not substantial new information because it did not change the less than significant conclusion for solid waste disposal impacts as adequate capacity is available for solid waste disposal at the current landfill site.

HH-30
It is acknowledged that the Ramona Unified School District enrollment numbers fluctuate from year to year and have changed since the timing of the analysis of

the school system in the Project EIR. Enrollment numbers at RUSD have steadily declined over the decade. Enrollment numbers for the 2010-2011 school year for the school district (combined general education and special education) were approximately 6,240 students compared to approximately 7,270 for the 2001-2002school year (RUSD *2001-02 thru 2010-11 Actual Enrollment (as of CBEDS) and 2011-12 Projected Enrollment*; available on the RUSD website). However, the EIR identifies that the public school system is overcrowded, which is still representative of current conditions. Regardless of the exact enrollment figures, California law allows the governing body of a school district to impose a fee on all new development within a district's jurisdiction for the purpose of funding the construction or reconstruction of school facilities. The Cumming Ranch project would be required to pay the current fees as required by the RUSD. With the collection of school fees, it is estimated that the Cumming Ranch project would generate approximately $1.2 million for RUSD. According to regulatory requirements, the district makes adjustments for incoming students and potential impacts remain less than significant.

HH-31
Refer to Response to Comment S-4 for the concern about construction of the sewer line in Santa Maria Creek. Refer to Response to Comment GG-1 about sewer provision to the site. It is correct that LAFCO approval is required for expansion of sewer service to the Cumming Ranch property. This is noted multiple times in the Draft EIR, including pages 1-10, 1-30, 1-36, and 3.6-12. RWQCB is not involved with the approval of extension of sewer service.

HH-32
As described in Section 3.6, the improvements proposed for the Santa Maria Waste Water Treatment Plan as planned by the RMWD are partially necessary to meet the existing demand. The expansion of the treatment plant is necessary regardless of the Cumming Ranch project and is being implemented independent of the proposed project. The planned improvements and existing environmental documentation of the treatment plant expansion as proposed by RMWD are included within Section 3.6 of the Draft EIR. Growth inducement of any approved or proposed treatment plant expansion would be addressed in required environmental documentation prepared for the RMWD.

The Reduced Project Alternative included in the Project EIR proposed larger lot sizes that allowed for use of septic systems as suggested by the comment. The Reduced Project Alternative was not the preferred alternative.

HH-33
Refer to Response to Comment V-3. No spray fields are contemplated as a part of the project.

HH-34
The cumulative impacts are addressed in each issue area analysis of the Draft EIR, including the commenter's areas of concern (public services and utilities, traffic, and biological resources). The analysis of each issue area included the identification of the appropriate cumulative impact study area and assessed the projects that could combine with the project to create a cumulatively considerable impact. As indicated in Section 2.1, the analysis found that cumulative traffic impacts would result. Cumulative impacts to public services including fire protection, water service, and sewer service were also identified. The analysis of climate change also identified cumulative impacts as a result of the project.

HH-35
The commenter's opposition to the project is described in this closing statement. The issues summarized in the comment have been addressed in detail earlier in the letter and no additional response is necessary.

Regina Wilson
16951 Sky Valley Dr.
Ramona, CA 92065
(760) 787-0929

Mr. Larry Hofreiter,
County of San Diego Department of Planning and Land Use
5201 Ruffin Rd. Ste B
San Diego, CA 92123

December 18, 2010

Re: Comments on the Proposed Cumming Ranch Project
GPA 03-007; SP 03-005; REZ 07-002, Log No. 03-09-028; Sch No. 2004031136

Dear Mr. Hofreiter,

II-1 After reviewing the DEIR for the Cumming Ranch Project significant issues become evident and need consideration. These are, in no particular order of importance, as follows: Traffic, Rural Character, Biological Resources, Water Resources, Growth Inducement, Services and Human Condition.

- **Traffic** With nothing but common sense, one can see what a problem additional traffic will be on Hwy 67 coming into and out of Ramona. Supervisor Jacob has recognized this for years and has no viable solution. Intentionally adding more vehicles to Hwy 67 is irresponsible. Hwy 67, from Poway Road to Archie Moore and Highland Valley Road is already deemed Grade F (worst grade possible) by the county. Approving 125 new homes with 930 additional vehicle trips made each day, on the heels of the recently approved Montecito Project of 417 homes with 883 vehicle trips daily, will severely negatively impact an already heavily congested and dangerous roadway. This is really a Public Safety Issue. There is no plan to upgrade the LOS F rating on Hwy 67 between Poway Road & Archie Moore or between Archie Moore & Highland Valley Road. (II-2)
- **Rural Character** Why is it we name something after what we have destroyed? This project will not be a Ranch or have any reflection of rural character. The proposed project is not in keeping with the **rural community character** of the West End. Parcels in the adjacent and nearby surrounding areas are agricultural in nature with large animal-keeping, ranching, and dry-land farming. Parcels directly adjacent the project south of HV Road average 3.5 acres, parcels to the northwest of Area A average 10.7 acres, and the proposed 2020 General increases the minimum lot size to 10 acres north of HV Road. The Cumming Ranch Project proposal of an average lot size of 1.6 acre (suburban-like parcels), most devoid of large animal-keeping, is in stark contrast to the surrounding rural area and is inappropriate. (II-3, II-4, II-5, II-6)
- **Biological Resources** There is a significant economic loss to Ramona with the habitat and subsequent biological grasslands/wetlands of Area A, in addition to the grasslands and riparian habitat of Areas B & C, are known foraging areas for numerous raptors, including the Golden Eagle, Bald Eagle, Red-Shouldered hawk, Ferruginous hawk, Coopers hawks, White-tailed Kites, Turkey Vultures, Red-tailed hawks, Kestrels and owls, to name a few. In fact, Area A was once used as a prime viewing area for the local hawk-watch group. It is preposterous to think that the proposed small islands of "open (II-7)

Letter II
Regina Wilson

II-1
This is an introductory comment that outlines the topics discussed in detail within the comment letter and does not specifically address the analysis presented in the Project EIR. No response is necessary.

II-2
Refer to Response to Comment T-3.

II-3
While the Cumming Ranch project would introduce a development with smaller lots than some of the surrounding rural residential lots, it would also provide more open space. All of the residential lots are large enough for animal husbandry and/or agriculture (1 to 3.1 acres) consistent with "ranch" and rural character of the area.

II-4, II-5, and II-6
Refer to Response to Comment T-2 for the response to the identical comment.

II-7
Refer to Response to Comment T-4.

II-7 Cont

space" amidst clusters of suburban type dwellings/parcels will remain safe and useful forage and nesting areas to wildlife. Loss of this forage/nesting habitat means a loss of vital biological resources for both the community of Ramona and for the County of San Diego.

II-8

- **Water Resources** This project puts a greater burden on our already precious resource of water. We live in a semi arid region where we are coming out of a historically wet century. Our climate is returning to pattern that was experienced over the last millennium. Water and sewer and subsequent disposal leads to addition problems for the Ramona Municipal Water District.

II-9

- **Growth Inducement** Inclusion of a sewer system to serve the proposed development clearly paves the way for major development on the west end of Ramona resulting in the blockage of wildlife corridors. Additionally, construction for sewer connection would occur directly thru the heart of the Ramona Grasslands. Sewage lines will cross sensitive waterways with potential of sewage spill into the Etcheverry and Santa Maria drainage systems, and thru a well-known major floodplain. This water not only feeds the aquifers & wells of surrounding properties downstream, but also flows into Lake Hodges – a municipal water supply.

II-10

II-11

- **Services** This and other large-scale projects in Ramona will strain our already skeletal public safety services.

II-12

- **Human Condition** This could be another way of saying aesthetics but it goes further than that. People are willing to drive "down the hill" for some necessities but choose to live in an area surrounded by open space, trees and silence. We all experience the physical transformation our bodies make as we go from traffic, stress and noise. This project not only sets the tone visually to the entrance to Ramona but also physically. This project will transform Ramona into suburbia and for what?

II-13 The concerns outlined above, are in conflict with the general plan. Just because a project can be built, doesn't means that it should be built. I appreciate the opportunity to comment on this project.

Sincerely,

Regina Wilson

II-8
The analysis of water supply, sewer availability, and provision of service has been coordinated with the RMWD as recently as April 25, 2011. Refer to the attached Project Facility Availability Forms (attached to these Response to Comments). Also refer to Responses to Comments GG-1 and HH-28.

II-9
Refer to Response to Comment T-5 for the response to the identical comment.

II-10
Refer to Response to Comment Z-20 for the response to the identical comment.

II-11
Potential impacts to public safety services are addressed in Section 3.6 of the Project EIR. The EIR found significant direct and cumulative impacts to fire protection services (Impacts PS-1 and PS-4) due to implementation of the project. Mitigation requiring participation in a Community Facilities District as conditioned by the Ramona Fire Prevention Bureau in Mitigation Measures M-PS-1 and M-PS-2 ~~and~~ would reduce the impact to less than significant. Impacts to Law Enforcement were found to be less than significant because the Sheriff's Department has indicated the project will not generate a significant increase in law enforcement demands and adequate staff are currently available to serve the project.

II-12
This comment does not address the environmental analysis provided in the Project EIR. It is acknowledged that the project will make an incremental unmitigated increase in cumulative traffic that cannot be fully mitigated, a mitigated increase in direct traffic, a less than significant increase in noise generated from the project, and a less than significant visual impact with mitigation for incorporation of noise barriers on individual lots. Finally, although the project would result in 125 additional residential lots, several measures have been taken to reflect the overall character of the surrounding area. These measures include designating/and or dedicating 457.4 acres as open space, providing for a range of lot sizes between 1 acre and 3.1 acres, minimizing the amount of grading that would be required, preserving rock outcroppings and oak trees through implementation of a Site Plan, and eliminating industrial use as an allowed use in the Cumming Ranch portion of the Ramona Community Plan

II-13
The comment does not specify how the items listed are inconsistent with the General Plan. Section 4.1.4 of the Final EIR analyzes potential land use conflicts and plan inconsistencies that could result from the proposed project and concludes that the project would have a less than significant impact. No additional response is necessary.

20 Dec 2010

Patricia Wisman
17283 Voorhes Lane
Ramona, CA 92065

Larry Hofreiter, AICP, Planner
County of San Diego Department of Planning and Land Use
5201 Ruffin Road, Suite B
San Diego, CA 92123

Dear Mr Hofreiter,

Re: Cumming Ranch Project: GPA 03-007, SP 03-005, TM 5344, STP 10-007, REX 07-002, LOG No. 03-09-028, SCH No. 2004031136

Please find the following DEIR review comments.

3810-03-005-GPAR-SP

JJ-1 Page 1-7 Creation of "Area B" availability for purchase by conservancy. This paragraph needs to address the timeline the conservancy has to acquire this property.

The problem: If the conservancy does not acquire "Area B" then the owner has the right to develop this property in the future.

JJ-2 Page 2-7 Surrounding Properties. This paragraph incorrectly identifies surrounding developments. It identifies communities to the east of Area 'C'. Although the Cumming Ranch has proposed 3 Areas 'A', 'B', 'C', only Area A is being developed for residential use as proposed by this amendment. This paragraph should correctly state what the surrounding community consists of for the developmental Area 'A': To the west and south single family homes range from 2 to 10 acres in size. To the north, homes are on lots 10 acres and larger. Houses located to the east of Area 'A' have lot sizes ranging from 10 acres and larger.

JJ-3 Page 3-1 Reduces Maximum Allowable Density. In breaking this project into 3 separate areas means that Area 'A' is a subdivision of the project and the maximum number of dwelling units must be recalculated for this area. Recalculate to conform to Zoning Ordinance Section 4115 for each area. Table 4-1 shows density at .35 for Area 'A', and 0 for Areas 'B' and 'C'.

JJ-4 Page 3-1 Reduces the Minimum Lot Size. Reducing lot sizes from an average of 4 acres to 1.5 acres is not in keeping with Ramona's Community Plan and surrounding developed area.

JJ-5 Page 3-7 Proposed GPA is less intense than the current Community Plan. Saying 41 fewer residential dwelling units does not result in less traffic is erroneous, in fact this proposed plan creates more traffic

Letter JJ
Patricia Wiseman

JJ-1
The timing of sale to a conservancy is not important for the conservation and management of Area B because the specific plan and ongoing mitigation require that this area be maintained as open space, though continued farming operations on the 138.5 acres and access to existing farm roads as allowed under the Resource Management Plan may occur. As detailed on page 1-19 of the Draft EIR, the specific plan required for implementation of the proposed project designates Area B as Open Space (OS-2), which does not allow development. As discussed on page 1-2 of the Draft EIR, a portion of Area B will be used to satisfy mitigation requirements and would be subject to an open space easement granted to the County, precluding disturbance or development.

JJ-2
This comment provides a description of the community surrounding Area A of the Cumming Ranch property. The language in the Final EIR has been modified to more clearly reflect the lot sizes of the surrounding properties.

JJ-3
The project includes the entire 682.6-acre Cumming Ranch property. The project was specifically designed to participate in and accommodate the County's Ramona Grasslands Preserve in its formation. Early in the planning process, and in close consultation with County staff, the project was divided into three areas—Areas A, B and C. Area A would be retained by the property owner for development, Area B would be made available for sale to the County or a conservancy acting for the Ramona Grasslands Preserve, for inclusion with the Ramona Grasslands Preserve. Area C would be donated by the owner to the County, or a conservancy acting for the Ramona Grasslands Preserve, for inclusion with the Ramona Grasslands Preserve. Section 1.1 of the Project EIR provides details of the division and use of the property, and Section 1.3 provides information regarding the Ramona Grasslands Preserve.

The cited section of the Zoning Ordinance requires that the density be calculated based on "the exterior boundary lines of any subdivision." The proposed subdivision for Cumming Ranch (TM 5344) is shown in the Final EIR in Figure 1-6. The area within the exterior boundary lines of the subdivision totals 682.6 acres. As noted in the comment and shown in Table 1-1 of the Final EIR, the density calculated for just Area A is 0.35 dwelling units per acre. When considering entire project property, the overall density is 0.18 dwelling units per acre.

JJ-4
Refer to Response to Comment T-2.

JJ-5
Analysis of the Existing Community Plan as compared to the proposed project was conducted as part of the alternatives analysis within the Project EIR as Section 5.3. The analysis found that impacts would be greater for all issue areas with the exception of agriculture. The increased impacts are due in part to the increased number of allowed residential units and the industrial development that would increase heavy truck trips to the area, necessitate additional access and service provision, and be located in a biologically sensitive portion of the site. Additionally, no land would be available for inclusion in the Ramona Grasslands Preserve. Based on the Land Use Map that was adopted on August 3, 2011, as part of the General Plan Update, 125 residential lots would be allowed. This is consistent with the number of units proposed as part of the proposed project. Because it is not clear how the commenter concludes that worse environmental conditions would result from a project proposed under the Existing Community Plan alternative, no further response can be provided.

JJ-5 cont: on a single road, Highland Valley to the intersection of Hwy 67. It also creates more impact on the neighboring properties because of the density of the proposed project. This project does not provide less impact on sensitive resources but more, reference HLP.

JJ-6: Page 3-7 Proposed project maintains the rural character of the community. Urban clustering of lots are not characteristics of a rural setting. Any open space within Area 'A' will be overwhelmed by the mass density of the proposed neighborhood. Although large animal keeping is a large part of the rural lifestyle, there is usually enough land per lot to accommodate keeping livestock. The proposed project of an average of 1.5 acres does not conform to minimal standards in keeping large animals. E.g., on average a single horse needs 1 acre; this would include housing and grazing area. This does not include a 3000 square foot house encroaching in that acre.

JJ-7: Page 3-12 Recreation #11 and Page 3-13 Distinguish and Separate Communities#17. This paragraph references a two-acre trail staging area. Is this a staging area that the proposed project will provide or a proposed staging area the County Trails Program will build? Be more specific.

JJ-8: Page 3-15 2.3 Retain the rural character of non-urban lands. The average lot size is incorrect. Change 2.9 acres to 1.5 acres. Again, this is not in keeping with the character or surrounding community.

JJ-9: Page 3-34 #6. The proposed project of an average of 1.5 acres does not conform to minimal standards in keeping large animals.

JJ-10: Page 3-36 #2. The proposed project lot sizes are from 1 to 3 acres in size not one to over five acres in size. The proposed project of an average of 1.5 acres does not conform to minimal standards in keeping large animals.

JJ-11: Page 3-42 #7 Facilities and Service Goal: The Cumming Ranch GPA violates the goal of "Discourage Premature Urbanization of Agricultural Lands" by designing a clustered community of lot sizes less than the surrounding developed area.

JJ-12: Page 3-51 General #1. In breaking this project into 3 separate areas means that Area 'A' is a subdivision of the project and the maximum number of dwelling units must be recalculated for this area. Address the overall density of Area 'A'. Recalculate to conform to Zoning Ordinance Section 4115 for each area. Table 4-1 shows density at .35 overall for Area 'A', and 0 for Areas 'B' and 'C'.

JJ-13: Page 4-23 Trails and Pathways: This paragraph references a two-acre trail staging area. Is this a staging area that the proposed project will provide or a proposed staging area the County Trails Program will build? Be more specific.

3810-03-005-Cumming_Rch_DEIR

JJ-14: Page S-6 Reduced Project Alternative. This alternative seems to fit better within the existing community and rural character of Ramona. The larger lot sizes would not encroach on the unique landforms any

JJ-6

Typical clustering of residential lots is not proposed by the project, though the project has grouped the lots in such as way to minimize impacts to environmental resources. An analysis of an alternative that proposes a more typical clustered residential development is provided in the Project EIR in Section 5.4. The areas of open space in Area A are quite large, with open space totaling over 143 acres. The Area A open space avoids impacts to environmental resources, provides important spacing, and retains key visual features of the site. Some of the smaller lots proposed as part of the project may not support large animal keeping and may have animal restrictions developed by the HOA; however, the larger sized lots would be appropriate for animal keeping. As described on page 1-14 of the Draft EIR, animal keeping would be allowed where appropriate within the Cumming Ranch project, including corrals, barns, or stables. Refer to Responses to Comments V-24 and T-2.

JJ-7

Area C will be donated at the final map stage to the County. Following public review of the proposed project and EIR, the County determined that the 2-acre staging area and associated trail needed to be removed from the project. DPW Airports Division determined that granting access to the staging area and allowing the pathway along Airport Road would not be in conformance with the FAA airport easement that prevents inconsistent land uses (March 5, 2012). In addition, the Wildlife Agencies have determined that they do not support trails or a staging area in Areas B or C at this time (March 1, 2012).

Since the provision of previous response, the FEIR was clarified regarding trail implementation. The trail alignment in Area B would be dedicated and may be built by DPR in the future in coordination with the Ramona Grasslands Public Access Plan. The project trails within Area A and Hardy Ranch remain with operation and management by a DPR designee and the Resource Manager. It should be noted that Area C will be donated at the final map stage to the County for inclusion in the Ramona Grasslands Preserve. Additionally, the staging area has been removed from the project.

JJ-8

The commenter is incorrect. The text states that if the common open space within Area A were allocated to the 125 residential lots, the average lot size would be 2.9 acres. Please see Response to Comment T-2 regarding consistency with community character.

JJ-9

See Response to Comment JJ-6 above regarding animal keeping. All residential lots would have an "L" Neighborhood Regulation as specified in the County's Zoning Ordinance, which allows Large Animal Raising (other than horse keeping)

with the following limitations: 2 animals on 1.5 acres or less and 1 animal per 0.5 acre on lots 1.5 acre to 4 acres. The “L” Neighborhood Regulation permits horse keeping (other than animal sales and services) without specifying a minimum lot size.

JJ-10
The residential development would consist of 125 residential lots, ranging in size from 1.0 to 3.1 acres. Average lot size would be approximately 1.5 acres. See Response to Comment JJ-9 above regarding animal keeping.

JJ-11
The Cumming Ranch property has been designated for residential and industrial for many years as a Specific Plan Area within the Ramona Community Plan. Though dry land farming has been ongoing on the project site, the project location is adjacent to the urbanized Ramona Town Center, surrounded by semi-rural residential development. Therefore, the project is consistent with the planned growth for the Ramona community.

JJ-12
Refer to Response Response to Comment JJ-3.

JJ-13
Please see Response to Comment JJ-7 regarding the trail staging area.

JJ-14
As shown in Figure 5-3, the Reduced Project Alternative that provides larger lot sizes has the potential to have a greater impact on the landforms throughout the project site, as compared to the proposed project. As described in analysis of the Reduced Project Alternative in Section 5. 5 of the Project EIR, the encroachment into the steeper hillsides would require more grading to create level building pads than the lots proposed by the project, which are designed into the natural terrain. By encroaching farther on the landforms and hillsides, the larger lots would have additional impacts into the upland habitats located on the hillsides. The development of lots on the steeper slopes would result in the potential for increased runoff. Larger lot sizes would reduce the ability to effectively preserve cultural resources in open space areas, resulting in potential impacts to those resources. It is correct that the Reduced Project Alternative was identified per CEQA requirements as the environmentally superior alternative as described on page 5-31 of the Draft EIR, but this alternative does not meet the majority of the project’s objectives.

more than the proposed project would. But instead, the limited larger lots would be aesthetically pleasing and less intrusive. The smaller lots require more grading and with the larger number of houses would be more detrimental to the landforms, habitats, and indigenous species of this area.

JJ-14 cont

This alternative would not have any greater impacts as compared to the proposed project. Biology, cultural resources, and water quality would remain the same or may even be reduced do to the decrease in density this alternative provides. Reference Table S-2 which indicates that the "Reduced Project Alternative" is superior to all other alternatives save the No Build Alternative.

Table S-1.

JJ-15 IMPACT TR-1b. The ADT for this project is 1250 and provides significant impact to all SR67 segments. There are no plans by CALTrans to expand SR 67 in either direction. Significance After Mitigation should be changed to Significant.

JJ-16 IMPACT tr-2A. The ADT for this project is 1250 and provides significant impact to this intersection. After Mitigation should be changed to Significant.

JJ-17 IMPACT TR-2b. A signal at SR 67 and Archie Moore Road would further degrade the traffic conditions and provide no relief to the existing SR 67 congestion. This road is already used by the local community to by-pass the light at SR 67 and Highland Valley. Putting a light at 67 and Archie Moore would not promote more locals to use Archie Moore as an alternative route. Suggesting that Archie Moore as an alternative route could increase traffic past the elementary school decreasing the safety of the children attending that school. Additional traffic studies on Archie Moore Road to Highland Valley need to be completed on the cumulative effects a signal would have on the existing community. Significance After Mitigation should be changed to Significant.

JJ-18 IMPACT TR-3a thru TR-9. Existing cumulative studies are outdated, they were gathered in 2007. A new analysis is require do to the increase of proposed housing projects in the area. The cumulative effects should be a significant impact to travelers as well as the businesses along SR 67.

JJ-19 Page 1-18 General Plan Amendment. . In breaking this project into 3 separate areas means that Area 'A' is a subdivision of the project and the maximum number of dwelling units must be recalculated for this area. Address the overall density of Area 'A'. Recalculate to conform to Zoning Ordinance Section 4115 for each area. Table 4-1 of the 3810-03-005-GPAR-SP shows density at .35 overall for Area 'A', and 0 for Areas 'B' and 'C'.

Page 1-29. The Cumming Ranch project proposal of 125 residential units significantly increases the density by masking the 125 residential units among 682 acres. In reality, Area 'A' is the only area being developed and should be considered a subdivision of the project which would mean that it would have its own density calculation. 125 residential units on 359 acres, 1.5 average lot size = .35.

JJ-20 Page 3.4-18 Conclusions. The proposed Cumming Ranch is not visually consistent with the surrounding area. The project's lots are too small and the density too great. It does not conform to the rural

JJ-21 characteristics of this community.

JJ-15
The less than significant after mitigation conclusion for Impact TR-1 in Table S-1 is correct. As described on pages 2-17 and 2-18 of the Draft EIR, the analysis demonstrates that for critical movements of traffic on SR 67, the mitigation improvements proposed for the SR 67/Highland Valley Road intersection would improve SR 67 segment travel times to better than existing conditions. This improvement to a Caltrans facility is considered feasible, because Caltrans has indicated that they agree with the scope of the improvements and the developer will be responsible for constructing the improvements prior to the impact occurring. There is no widening of the roadway required for this mitigation to provide operating improvements. This improvement in operating conditions due to project mitigation makes this impact less than significant.

JJ-16
The less than significant after mitigation conclusion for Impact TR-2a in Table S-1 is correct. As described on page 2-18 of the Draft EIR, project roadway improvements would improve the SR 67 and Highland Valley Road intersection LOS from E to C in the AM peak and from D to B in the PM peak. These improvements would substantially reduce the delay motorists experience at this intersection for the existing plus project conditions by over 57 seconds in the AM peak and 20 seconds in the PM peak. Travel times for the SR 67/Highland Valley Road intersection would improve to better than existing conditions and the impact would be mitigated to a less than significant level because the resulting LOS C and B are acceptable according to the Significance Guideline #2.

JJ-17
The less than significant after mitigation conclusion for Impact TR-2b in Table S-1 is correct. As described on page 2-18 of the Draft EIR, when warranted, improvements to the SR 67/Archie Moore Road intersection will include restriping of the intersection and installation of a three-way traffic signal within the existing right-of-way, to the satisfaction of Caltrans and the County of San Diego. LOS would improve to level D or better at the intersection.

There is no suggestion to use Archie Moore Road as an alternative route. The mitigation is directed to improve the traffic flow impact on SR 67. As described in Response to Comment JJ-16 above, the SR 67/Highland Valley Road intersection would be improved substantially by the project and the community would not need to bypass that intersection due to poor operating conditions.

JJ-18
The cumulative traffic analysis is conservative. Due to the recent economic downturn, housing projects have been withdrawn from County processing and therefore the cumulative list overestimates cumulative traffic volumes. Unless specific impacts to the physical environment would occur as a result, CEQA does

not consider economics, such as effects to business. Also see Response to Comment Z-11.

JJ-19
Please see Response to Comment JJ-3 regarding calculation of densities and division of the project site. The Project EIR makes no attempt to mask development information. The 0.35 density calculation presented in the comment is provided in bold type in Table 1-1, Development Summary Table in the Project EIR.

JJ-20
Refer to Response to Comment T-7. While it is true that the visual environment of the project site would be altered by the project, the Project EIR found that with the design features that have been incorporated and with mitigation for future noise barriers, visual impacts from the proposed project would be less than significant.

JJ-21
Refer to Response to Comment T-2.

3810-03-005-Cumming_Rch_DEIR_App_Vol_I

Appendix A.

JJ-22 Table1. Existing and Cumulative. Existing Count LOS scales are inadequate since LOS F is the highest possible rating. The additional strain on a LOS F segment when ADTs increase by 5000 - 7000 is lost.

JJ-23 Ramona's roads cannot sustain the urbanized development that is being approved by the County. Emergency plans are inadequate. Loss of lives will result because the infrastructure did not support the massive population increase.

3810-03-005-Cumming_Rch_DEIR_App_Vol_II

Appendix G.

JJ-24 Fencing and Walls. There should be a provision addressing the fencing to adjacent private properties. The fencing should be 6 rows of stranded wire in keeping with existing developed properties bordering the proposed project. No gates will be allowed between on these fences. A 25 foot setback buffer will be enforced for any lot bordering adjacent properties.

JJ-25 I do not support this project. I feel it destroys the rural character of Ramona by the nature of the projects clustering plan and small lot sizes. The project does not conform to the surrounding developed properties. I support the "No Build Alternative" but would consider the "Reduced Project Alternative" as an alternative to the existing or proposed project. I am hoping that the County Board of Supervisors supports this view and does not approve this project.

V/R

Patricia Wisman

JJ-22
The traffic study for the project uses the accepted traffic analysis methodology as required by the County. Even though LOS F is the lowest ranking used, traffic volume increases and delays in time that occur within the LOS F ranking are considered and use the change for impact evaluation as indicated within the Guidelines for Determination of Significance for Traffic Impacts, Section 2.1.2 of the Project EIR.

JJ-23
Refer to Response to Comment Z-14. Evacuations are the purview of law enforcement and communities, not projects. Required mitigation would improve traffic operating conditions over current conditions, specifically near the SR 67 and Highland Valley Road intersection and would be beneficial in improving traffic flow during an evacuation.

JJ-24
The comment does not address the environmental analysis provided in the Project EIR and no additional response is necessary. The provision of a 20-foot buffer and addition of fencing have been added as a project design feature to the Final EIR and analyzed for potential environmental impacts. The project would install a new fence along Voorhes Lane and establish a 20-foot buffer on the six residential lots adjacent to Voorhes Lane. The intent of the buffer is to maintain a vegetated area in order to reduce potential sediment runoff. Landscaping is allowed within the buffer but no planting is proposed as part of the current project. The perimeter fence and buffer requirements will be implemented and maintained through requirements of the Project Site Plan.

JJ-25
The commenter's opposition to the project is noted. The comment includes closing statements and does not address the environmental analysis provided in the Project EIR and no additional response is necessary.

20 Dec 2010

Patricia Wisman
17283 Voorhes Lane
Ramona, CA 92065

Larry Hofreiter, AICP, Planner
County of San Diego Department of Planning and Land Use
5201 Ruffin Road, Suite B
San Diego, CA 92123

Dear Mr Hofreiter,

Re: Cumming Ranch Project: GPA 03-007, SP 03-005, TM 5344, STP 10-007, REX 07-002, LOG No. 03-09-028, SCH No. 2004031136

Please find the following DEIR review comments.

3810-03-005-GPAR-SP

KK-1 Page 1-7 Creation of "Area B" availability for purchase by conservancy. This paragraph needs to address the timeline the conservancy has to acquire this property. Any acreage that is "For Sale" to the conservancy or County cannot be included in the projects calculations because it is speculative. Unless there is a promise to purchase by either agency or proof of funding then Area B acreage must be removed from the project plan. If allowed to remain, the project would benefit by increasing the project size and size of open space calculations. If the sale does not come to fruition then the owner also benefits by retaining ownership for future development. This is double dipping and should not be allowed.

KK-2 Page 2-7 Surrounding Properties. This paragraph incorrectly identifies surrounding developments. It identifies communities to the east of Area 'C'. Although the Cumming Ranch has proposed 3 Areas 'A', 'B', 'C', only Area A is being developed for residential use as proposed by this amendment. This paragraph should correctly state what the surrounding community consists of for the developmental Area 'A': To the west and south single family homes range from 2 to 10 acres in size. To the north, homes are on lots 10 acres and larger. Houses located to the east of Area 'A' have lot sizes ranging from 10 acres and larger.

KK-3 Page 2-9 Area B. What terms of an option agreement have been made? If there is a promise to purchase provide proof and a timeline to execute such purchase. This project cannot be approved until the funds are available by the buyer to purchase the property.

KK-4 Page 3-1 Reduces Maximum Allowable Density. In breaking this project into 3 separate areas means that Area 'A' is a subdivision of the project and the maximum number of dwelling units must be

Letter KK
Patricia Wiseman (2)

KK-1
Please refer to Response to Comment JJ-1.

KK-2
Please refer to Response to Comment JJ-2.

KK-3
No agreement is currently in place for the purchase of Area B. Project approval is not contingent upon the sale of Area B.

KK-4
Please refer to Response to Comment JJ-3.

KK-4 recalculated for this area. Recalculate to conform to Zoning Ordinance Section 4115 for each area. Table 4-1 shows density at .35 for Area 'A', and 0 for Areas 'B' and 'C'.

KK-5 Page 3-1 Reduces the Minimum Lot Size. Reducing lot sizes from an average of 4 acres to 1.5 acres is not in keeping with Ramona's Community Plan and surrounding developed area.

KK-6 Page 3-7 Proposed GPA is less intense than the current Community Plan. Saying 41 fewer residential dwelling units does not result in less traffic is erroneous, in fact this proposed plan creates more traffic on a single road, Highland Valley to the intersection of Hwy 67. It also creates more impact on the neighboring properties because of the density of the proposed project. This project does not provide less impact on sensitive resources but more, reference HLP.

KK-7 Page 3-7 Proposed project maintains the rural character of the community. Urban clustering of lots are not characteristics of a rural setting. Any open space within Area 'A' will be overwhelmed by the mass density of the proposed neighborhood. Although large animal keeping is a large part of the rural lifestyle, there is usually enough land per lot to accommodate keeping livestock. The proposed project of an average of 1.5 acres does not conform to minimal standards in keeping large animals. E.g., on average a single horse needs 1 acre; this would include housing and grazing area. This does not include a 3000 square foot house encroaching in that acre.

KK-8 Page 3-12 Recreation #11 and Page 3-13 Distinguish and Separate Communities#17. This paragraph references a two-acre trail staging area. Is this a staging area that the proposed project will provide or a proposed staging area the County Trails Program will build? Be more specific.

KK-9 Page 3-15 2.3 Retain the rural character of non-urban lands. The average lot size is incorrect. Change 2.9 acres to 1.5 acres. Again, this is not in keeping with the character or surrounding community.

KK-10 Page 3-34 #6. The proposed project of an average of 1.5 acres does not conform to minimal standards in keeping large animals.

KK-11 Page 3-36 #2. The proposed project lot sizes are from 1 to 3 acres in size not one to over five acres in size. The proposed project of an average of 1.5 acres does not conform to minimal standards in keeping large animals.

KK-12 Page 3-42 #7 Facilities and Service Goal: The Cumming Ranch GPA violates the goal of "Discourage Premature Urbanization of Agricultural Lands" by designing a clustered community of lot sizes less than the surrounding developed area.

KK-13 Page 3-51 General #1. In breaking this project into 3 separate areas means that Area 'A' is a subdivision of the project and the maximum number of dwelling units must be recalculated for this area. Address the overall density of Area 'A'. Recalculate to conform to Zoning Ordinance Section 4115 for each area. Table 4-1 shows density at .35 overall for Area 'A', and 0 for Areas 'B' and 'C'.

KK-5
The commenter is correct that the project originally proposed to change the Ramona Community Plan to allow 1-acre minimum lot sizes instead of 2-acre and 4-acre minimum lot sizes. However, staff do not agree that reducing lot sizes is not keeping with the surrounding developed area. Section 4.1.4.1 of the EIR explains that the area located east and northeast of the project site (adjacent to Areas B and C) is developed with single-family homes, typically 1 to 2 acres in size, with some areas of commercial/industrial uses. In the southeast corner of the project site, along the SR 67 corridor, are generally large parcels of land that are either vacant or used for farming. Single-family homes continue across the southern boundary of the project area and are generally 2 to 5 acres in size. Northwest of the project site (north of Voorhees Lane), there are also a few single-family homes that sit on large parcels, typically 5 acres or more. The area west of Areas B and C is the Ramona Grasslands Preserve and the area north of Area C is the Ramona Airport.

KK-6
Please refer to Response to Comment JJ-5.

KK-7
Please refer to Response to Comment JJ-6.

KK-8
Please refer to Response to Comment JJ-7.

KK-9
Please refer to Response to Comment JJ-8.

KK-10
Please see Response to Comment to Comment JJ-9.

KK-11
Please see Response to Comment JJ-10.

KK-12
Please see Response to Comment JJ-11.

KK-13
Please see Response to Comment JJ-3.

KK-14 Page 4-23 Trails and Pathways: This paragraph references a two-acre trail staging area. Is this a staging area that the proposed project will provide or a proposed staging area the County Trails Program will build? Be more specific.

3810-03-005-Cumming_Rch_DEIR

KK-15 Page S-6 Reduced Project Alternative. This alternative seems to fit better within the existing community and rural character of Ramona. The larger lot sizes would not encroach on the unique landforms any more than the proposed project would. But instead, the limited larger lots would be aesthetically pleasing and less intrusive. The smaller lots require more grading and with the larger number of houses would be more detrimental to the landforms, habitats, and indigenous species of this area.

This alternative would not have any greater impacts as compared to the proposed project. Biology, cultural resources, and water quality would remain the same or may even be reduced do to the decrease in density this alternative provides. Reference Table S-2 which indicates that the "Reduced Project Alternative" is superior to all other alternatives save the No Build Alternative.

Table S-1.

KK-16 IMPACT TR-1b. The ADT for this project is 1250 and provides significant impact to all SR67 segments. There are no plans by CALTrans to expand SR 67 in either direction. Significance After Mitigation should be changed to Significant.

KK-17 IMPACT tr-2A. The ADT for this project is 1250 and provides significant impact to this intersection. After Mitigation should be changed to Significant.

KK-18 IMPACT TR-2b. A signal at SR 67 and Archie Moore Road would further degrade the traffic conditions and provide no relief to the existing SR 67 congestion. This road is already used by the local community to by-pass the light at SR 67 and Highland Valley. Putting a light at 67 and Archie Moore would not promote more locals to use Archie Moore as an alternative route. Suggesting that Archie Moore as an alternative route could increase traffic past the elementary school decreasing the safety of the children attending that school. Additional traffic studies on Archie Moore Road to Highland Valley need to be completed on the cumulative effects a signal would have on the existing community. Significance After Mitigation should be changed to Significant.

KK-19 IMPACT TR-3a thru TR-9. Existing cumulative studies are outdated, they were gathered in 2007. A new analysis is require do to the increase of proposed housing projects in the area. The cumulative effects should be a significant impact to travelers as well as the businesses along SR 67.

KK-20 Page 1-2 Area B. Any acreage that is "For Sale" to the conservancy or County cannot be included in the projects calculations because it is speculative. Unless there is a promise to purchase by either agency or proof of funding then Area B acreage must be removed from the project plan. If allowed to remain, the project would benefit by increasing the project size and size of open space calculations. If the sale does

KK-14
Please see Response to Comment JJ-7.

KK-15
Please see Response to Comment JJ-14.

KK-16
Please see Response to Comment JJ-15.

KK-17
Please see Response to Comment JJ-17.

KK-18
Please see Response to Comment JJ-17.

KK-19
Please see Responses to Comments Z-11 and JJ-18.

KK-20
Please see Response to Comment V-22.

KK-20 cont not come to fruition then the owner also benefits by retaining ownership for future development. This is double dipping and should not be allowed.

KK-21 Page 1-16 Area B. Any acreage that is "For Sale" to the conservancy or County cannot be included in the projects calculations because it is speculative. Unless there is a promise to purchase by either agency or proof of funding then Area B acreage must be removed from the project plan. If allowed to remain, the project would benefit by increasing the project size and size of open space calculations. If the sale does not come to fruition then the owner also benefits by retaining ownership for future development. This is double dipping and should not be allowed.

KK-22 Page 1-18 General Plan Amendment. . In breaking this project into 3 separate areas means that Area 'A' is a subdivision of the project and the maximum number of dwelling units must be recalculated for this area. Address the overall density of Area 'A'. Recalculate to conform to Zoning Ordinance Section 4115 for each area. Table 4-1 of the 3810-03-005-GPAR-SP shows density at .35 overall for Area 'A', and 0 for Areas 'B' and 'C'.

KK-23 Page 1-19 Area B. Any acreage that is "For Sale" to the conservancy or County cannot be included in the projects calculations because it is speculative. Unless there is a promise to purchase by either agency or proof of funding then Area B acreage must be removed from the project plan. If allowed to remain, the project would benefit by increasing the project size and size of open space calculations. If the sale does not come to fruition then the owner also benefits by retaining ownership for future development. This is double dipping and should not be allowed.

KK-24 Page 1-29. The Cumming Ranch project proposal of 125 residential units significantly increases the density by masking the 125 residential units among 682 acres. In reality, Area 'A' is the only area being developed and should be considered a subdivision of the project which would mean that it would have its own density calculation. 125 residential units on 359 acres, 1.5 average lot size = .35 well above the County zoning ordinance.

KK-25 Page 1-63 Development Summary Table. Any acreage that is "For Sale" to the conservancy or County cannot be included in the projects calculations because it is speculative. Unless there is a promise to purchase by either agency then Area B acreage must be removed from the project plan. If allowed to remain, the project would benefit by increasing the project size and size of open space calculations. If the sale does not come to fruition then the owner also benefits by retaining ownership for future development. This is double dipping and should not be allowed.

KK-26 Page 3.4-18 Conclusions. The proposed Cumming Ranch is not visually consistent with the surrounding area. The project's lots are too small and the density too great. It does not conform to the rural

KK-27 characteristics of this community.

3810-03-005-Cumming_Rch_DEIR_App_Vol_I

Appendix A.

KK-21
Please see Response to Comment V-22.

KK-22
Please see Response to Comment JJ-3.

KK-23
Please see Response to Comment V-22.

KK-24
Please see Responses to Comments JJ-3 and JJ-19.

KK-25
Please see Response V-22.

KK-26
Please see Response to Comment JJ-20.

KK-27
Please see Response to Comment T-2.

KK-28 Table1. Existing and Cumulative. Existing Count LOS scales are inadequate since LOS F is the highest possible rating. The additional strain on a LOS F segment when ADTs increase by 5000 - 7000 is lost.

KK-29 Ramona's roads cannot sustain the urbanized development that is being approved by the County. Emergency plans are inadequate. Loss of lives will result because the infrastructure did not support the massive population increase.

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Appendix G.

KK-30 Fencing and Walls. There should be a provision addressing the fencing to adjacent private properties. The fencing should be 6 rows of stranded wire in keeping with existing developed properties bordering the proposed project. No gates will be allowed between on these fences. A 25 foot setback buffer will be enforced for any lot bordering adjacent properties.

KK-31 I do not support this project. I feel it destroys the rural character of Ramona by the nature of the projects clustering plan and small lot sizes. The project does not conform to the surrounding developed properties.

KK-32 The project supports double dipping by the owner by including Area B into calculations that are based on the speculative selling of Area B to the County or Conservancy. If the sale does not occur then the owner has the ability to develop this land in the future. Development of Area B was in the original project plan and is very suitable to development.

KK-33 I support the "No Build Alternative" but would consider the "Reduced Project Alternative" as an alternative to the existing or proposed project. I am hoping that the County Board of Supervisors supports this view and does not approve this project.

V/R

Patricia Wisman

KK-28
Please see Response to Comment JJ-22.

KK-29
Please see Response to Comment JJ-23.

KK-30
Please see Response to Comment JJ-24.

KK-31
Please see Response to Comment JJ-25.

KK-32
Please see Response to Comment V-22.

KK-33
The commenter's support of the No Build Alternative or Reduced Project Alternative is noted. The comment includes closing statements and does not address the environmental analysis provided in the Project EIR and no additional response is necessary.

Mr. Larry Hofreiter
County of San Diego-Department of Planning and Land Use
5201 Ruffin Road, Ste B,
San Diego, CA 92123

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DEC 20 2010
San Diego County
DPLU - FISCAL

Subject: Comments on the Proposed Cumming Ranch Project DEIR
GPA 03-007; SP 03-005; TM 5344; STP 10-007, REZ 07-002, LOG NO. 03-09-028;
SCH NO. 2004031136

Dear Mr. Hofreiter:

LL-1 After reviewing the draft EIR for the Cumming Ranch Project I have significant concerns and comments regarding the impact that such a proposal could have on the community of Ramona. Specifically the following:

LL-2 1. **Inconsistency in the Rural Community Character** of the West End of Ramona. Existing community character is based on open land, open space, and undeveloped countryside with low density homes. Parcels in the adjacent and nearby surrounding areas are agricultural in nature with ranching, dry-land farming and large animal-raising. Parcels directly adjacent the project south of Highland Valley Road average 3.5 acres; parcels to the west and southwest of Area A, average 4.2 acres; parcels to the northwest of Area A, average 10.7 acres; and the proposed 2020 General Plan increases the minimum lot size to 10 acres north of Highland Valley Road. The Cumming Ranch Project proposal of average 1.5 acre lot size (suburban-like parcels), mostly devoid of large animals, is in stark contrast to the surrounding rural area and is inconsistent. Therefore, the EIR statement on Page 3.4-16 is false.

Also, these smaller lots would not be a reasonable transition to the adjoining properties. Parcels to the west of Area A in the Cumming Ranch high density housing project has an average lot size of 1.5 acres in this section and is not consistent with adjacent properties (typically over 5 acres lots, some are over 10 acre lots: Assessor's Parcel Map 283-03 Sheet 1 of 2) in which many of them currently have horses. The Cumming Ranch's urban style does not fit in the rural community character for this area.

LL-3 The big developers should not get special treatment to amend the existing General Plan. Cumming Ranch should abide by the historic standard of this area determined by the General Plan. If it is allowed, it will create a precedent in the future for more developers to amend the General Plan for their own profits. We do not accept this proposed 1-acre minimum lot size.

LL-4 The serene scenery and peaceful quiet environment we have in the west end of Ramona will be irreversibly lost. There is no way to mitigate these qualities once the proposed 125 high-density homes are built.

LL-5 It may be unwise for the Decision Makers to approve another project similar to Montecito project in Ramona until the *General Plan 2020* is in place.

LL Form Letter
34 Signatures

Refer to the responses to comment regarding letter Z for the responses to this letter.

LL-6 2. **Congestion of Roadways**: SR-67, from Poway Road to Archie Moore and Highland Valley Road is already deemed Grade F (worst grade possible) by the county. Approving 125 new homes with 1250 additional vehicle trips made each day, in addition to the recently approved Montecito Project of 417 homes with 4170 vehicle trips daily, will severely impact an already
LL-7 heavily congested and dangerous roadway. The traffic study data in EIR (2004 and 2007) is
LL-8 outdated. The projected average daily trips (ADT) should include all traffic per household: ten times amount of the number of houses. Also EIR should note more ADT during construction.

LL-9 SR-67 is the primary road in and out of Ramona. The main concern is bumper to bumper traffic during rush hour both morning and evening, and the prospect of more collisions as drivers exiting Highway to side streets without traffic signals, and merging to Highway from side streets, taking chances passing over center line. The California Department of Transportation Development Review Branch, District 11 Planning Department should review this based on the traffic accidents and mortality records and the proposed future widening of SR-67, addressing the impact on SR-67 that would be caused by future increases in traffic to and from the proposed project, Cumming Ranch, located on Highland Valley Rd intersecting SR-67.

LL-10 There is no plan to upgrade the LOS F-rating on SR-67 between Poway Road & Archie Moore or between Archie Moore & Highland Valley Road. In the last 6 years we have had 2 major wildfires in the Ramona area. Evacuation and returning back to the homes was a major traffic problem with people stuck in their cars for several hours. This is really a PUBLIC SAFETY ISSUE. It is absolutely necessary for EIR to include more current traffic counts and studies. Furthermore, it may be unwise for the Decision Makers to approve this Cumming Ranch project in Ramona until *the 2030 Regional Transportation Plan* widens SR-67.

LL-11 3. **Loss of Biological Resources and Lack of Mitigation.** The project site is home to a diverse population of native animals, including Mountain Lions, the American badger, Southern Mule Deer, San Diego black-tailed Jackrabbit, bobcats, and numerous native plant species. The hilltops' Coastal Sage Scrub, and grasslands/wetlands of Area A, in addition to the grasslands and riparian habitat of Areas B & C, are known foraging areas for numerous raptors, including the Golden Eagle, Bald Eagle, Red-Shouldered hawk, Ferruginous hawk, Coopers hawks, White-tailed Kites, Turkey Vultures, Red-tailed hawks, Kestrels and owls, to name a few. In fact, Area A was once used as a prime viewing area for the local hawk-watch group. It is preposterous to think that the proposed small islands of "open space" amidst clusters of suburban type dwellings will remain a safe and useful forage and nesting areas to wildlife. Loss of this forage and nesting habitat means the loss of vital biological resources for both the community of Ramona and for the County of San Diego. A multitude of species that thrive in this area are also on the protected list (CDFG State Protected Species and Species of Special Concern).

LL-12 South of Highland Valley Rd, and immediately east of Adrienne Way is approximately 15 acres of green vegetation; including various species of oak trees and native plant communities identified here is what is known as Coastal Sage Scrub. Historically, this 15-acre section has been a part of an undeveloped open space. This natural and undeveloped area has always been green trees, and plants surviving on the water provided by a natural underground water source. In fact, this area is part of the evergreen vegetation area at the west end of Ramona. This stretch

of evergreen vegetation area starts from the southern border of Poway up to this east end of Adrienne Way. No other location can replace this dense and unique vegetation because of this exclusive connectivity. The project proposes to eliminate over 15 acres of dense native Coastal Sage Scrub on Area A's hilltop immediately east of Adrienne Way (current proposed parcels #58 through #70). This particular habitat loss cannot be replaced in another area of Ramona because of its exclusive connectivity from this area to the southern border of Poway. Due to this uniquely situated habitat location within Area A, and its biologically sensitive value, loss of habitat cannot be mitigated and lack of mitigation is a problem.

LL-12 cont

Cumming Ranch conceptual site plan Figure 4 (2005 plan) protected this habitat area, parcels #56 through 70 were placed to avoid wildlife habitat more carefully at that time, which was a better plan for this section of habitat. Therefore, why would it not be possible for the current plan to protect this area without loss of habitat?

LL-13

4. **Growth Inducement, Habitat and Waterway Degradation** due to Sewage System. All existing properties in the surrounding community of the west end of Ramona have septic systems. However, inclusion of a sewage system to serve the proposed development clearly paves the way for major development resulting in the blockage of wildlife corridors.

LL-14

Additionally, construction for a sewer connection would occur directly through the heart of the Ramona Grasslands.

LL-15

Consequently, sewage lines will cross sensitive waterways with the potential of sewage spill into the Etcheverry and Santa Maria drainage systems, and through a well-known major floodplain. This water not only feeds the aquifers & wells of surrounding properties downstream, but also flows into Lake Hodges.

LL-16

5. **Sprayfields Impacts**.
Ramona Sentinel newspaper (December 2, 2010) headline states: "Sprayfields needed for 125 new homes, district tells county"—The EIR has not identified any sprayfields as part of the Cumming Ranch project, so the potential environmental impacts of sprayfields have not been evaluated. Where is the location of sprayfields? How many tens of thousands of gallons of treated wastewater will fall on a sprayfield? The wastewater from 125 residential dwelling units will make acres of land constantly wet. Until the study is evaluated and the results show there is no hazardous and adverse impact to humans and animals, the project should be temporally halted.

LL-17

6. **Noise Nuisance** due to insufficient setback. In the proposed site plan, parcels #40 through #52, and #62 through #67 are too close to the existing properties of the surrounding community. The clusters of housing too close to the neighboring property lines will create a public nuisance to surrounding properties, including; noise, vibration, traffic or other disturbances. Noise pollution may cause serious harm to both man and the environment. The study must be provided for the potential damage caused by noise pollution to human and other living species.

LL-18

7. **Light Pollution.**
Proposed area is extremely peaceful and quiet and an important aesthetic resource at night. Living in a low density area provides the dark night sky. For the property owners, the dark starry night sky is a choice and a vital part of their enjoyment and mental health. The qualities of low-density housing area and the dark sky should be preserved. The area shall remain low density to preserve its rural character. The proposed 125 high density houses are out of character with the existing community and incompatible. The clustered houses will emanate light and ruin the darkness of starry sky. Light pollution can have serious repercussions, such as disturbing ecosystems and provoking diseases in humans. The EIR fails to include impact of Light Pollution. The study of the impact of this everyday light pollution in this proposed site on human health and other living species and their long term effects must be conducted.

LL-19

8. **Negative Aesthetic Impact at the Entrance of Ramona.**
The entrance into Ramona is officially designated at the SR-67 - Highland Valley Road interchange with a hand-crafted metal welcome sign displaying the representatives of Ramona: horses, raptors and mountains. This area is rural and equestrian in nature. The most scenic views in Ramona are of the hills, valleys and open spaces. These visual qualities should be preserved. The area should remain non-industrial and low-density to preserve its rural character. The community spirit should be maintained through careful development of the remaining parcels into residences similar in character to the existing ranches and custom homes that promote unity.

LL-20

However, the placement of 125 one-acre residential lots when approaching this entrance sign would contradict the historically equestrian nature and expansive openness that is Ramona. These 125 high density homes would not represent the County's designation of SR-67 as a "Scenic Highway." The issue is the aesthetic impact that the proposed housing development will have on a historic wilderness landscape. Additionally, the applicant proposes development of single-family homes that will NOT possess characteristics similar to the surrounding neighborhoods. This development causes a significant, negative aesthetic effect due to the placement of 125 single family residential units on approximately 682.2 acres of what is currently undeveloped, open space.

LL-21

LL-22

Since the proposed development is situated at such an important location — the heart of Ramona, an accurate assessment of the aesthetic impact of a proposed 125 housing development should be conducted. The photographs included in EIR of before-and-after simulations severely lack the true image impacted by the houses (Figure 3.4-3 through 3.4-7). The photos emphasize the road, downplaying the impact of the houses. Further, these photographs were taken from such a distance and from particular angles. They do not accurately represent the number of houses that should be in view. Only two small houses are presented in the simulation images. The simulation images are misleading. Because the terrain of the proposed site is not flat, the two dimensional photo simulation is not adequate. The EIR is incomplete and inadequate. In order to portray a more accurate visual impact of the house tract to the viewers, a computer-assisted 3d images of all the houses and surrounding scenic panorama in a visually cohesive manner from all angles, should be provided in the EIR.

LL-23

9. **Erosion, Flooding, Soil Contamination, Climate Change.**

As mentioned in item 3, south of Highland Valley Rd., and immediately east of Adrienne Way is approximately 15 acres of green vegetation; including various species of oak trees and native plant communities identified here is what is known as Coastal Sage Scrub. Historically, this 15-acre section has been a part of an undeveloped open space. This natural and undeveloped area has always been green trees, and plants surviving on the water provided by a natural underground water source. In fact, this area is part of the evergreen native vegetation area at the west end of Ramona. This stretch of evergreen vegetation starts from the southern border of Poway up to this east end of Adrienne Way. LL-24

Also the 15 acres of native evergreen vegetation acts as a buffer to absorb overflow, reducing runoff and filtering excessive pollutants from surface and groundwater sources that naturally help the surrounding rural community. However, the proposed parcels # 60 through 75 will eliminate this Coastal Sage Scrub and hundreds of deep rooted oak trees that inhabit this area. Adrienne Way is a hill and the15 acres of vegetation sits at the highest point of this area. The topography shows that the land slopes down toward the eastern direction and becomes a wetland. Any drastic reduction of native vegetation, soil taken from the land by grading, soil contamination, artificial conveyances-gutters, storm pipes altering the drainage patterns, can cause artificial grooves as a result of urbanization and can upset the natural balance maintained in the area.

This will put this unique area at risk. If the proposed project is allowed, 682.6 acres of historic open space suddenly becomes covered with concrete, asphalt, and other construction material. LL-25

Also, because this current plan does not consider a No Build Alternative or Reduced Project Alternative, which are both considered environmentally superior alternatives, Cumming Ranch fails to meet the San Diego County Draft General Plan's major strategy in its policies in the Land Use, Conservation and Open Space, and climate change: i.e., "Maximize preservation of open spaces, natural areas, and agricultural lands." There are multiple concerns here such as: erosion, flooding, loss of cleaner underground water, and climate change. The EIR is incomplete. Only an assumption of short-term water pollution is described without data. (Page 4-10) The detailed study of short-term impacts and its definition of "short term" should be included in the EIR. LL-26 LL-27 LL-28

10. **Blocking Scenic Views; Increasing Traffic Views.**

The proposed parcels #40 through #52, and #62 through #67 will impact the views experienced by the existing one-story single family residences located directly south and southwest of the project site. The single story homes of existing residences currently maintain views to the north of the vacant project site out to Cranes Peak and Orosco Ridge. Many of the residents are able to see northeast of the site to the mountain ranges of Middle Ridge, Black Mountain, Gem Hill, Corral Mountain, Angel Mountain, Whale mountain and Witch Creek Mountain. The elevations of the proposed site vary and subject to grading adjacent to the existing residences. The project proposes grading in order to remediate existing on-site soils through the removal and the placement of additional fill dirt on-site. Grading will result in on-site landform grade elevation increases. This increase combined with construction of residential units could block existing LL-29

scenic views experienced by the residents adjacent to the proposed site.

LL-30 Due to the conversion of what is currently vacant land to residential tract land use, this will totally change the view. The view will include vehicles driving on additional residential roads within the proposed project, in addition to a view of constantly flowing vehicles and congestion along Highland Valley Rd. to and from the proposed site. According to SANDAG, 10 trips per dwelling unit per day for a single family detatched household; therefore, minimum of 1250 trips per day for the proposed Cumming Ranch.

LL-31 Therefore, the proposed project will affect current residences by blocking existing views of calm and peaceful open space, instead, it will increase the view of busy traffic of vehicles. The EIR fails to address this scenic sight loss experienced by the surrounding neighbors. In considering

LL-32 blockage, what is the height of the proposed residential units within the Zoning and Subdivision Ordinance? And which parcels are planned as two-story houses? The proposed plan should take into account one-story houses rather than two-story houses in consideration of the adjacent residences to minimize scenic blockage.

11. **Loss of Sensitive Prehistoric Cultural Resources.**

LL-33 According to Chapter 3.0/3.2 Cultural Resources 3.2.3 Analysis of Project Effects and Determination of Significant Impact, page 3.2.5 states "Because of the cultural sensitivity throughout the project site, the potential to directly impact unknown cultural resources during ground-disturbing activities is a potentially significant impact per Guideline 1 (Impact CR-1)"

The discrepancies are as follows:

LL-34 (1) The EIR Table 3.2-3, Cumulative Project List for Cultural Resources, page 3.2-26, number 33 Cumming Ranch, number of lots 136 is an error.

LI-35 (2) Significance: "To be determined by testing" - When will the testing be completed?

LL-36 (3)Mitigation: "Sites on OSE will not be tested." - Why are the sites on OSE (Open Space Easement) not tested ?

LL-37 (4) Native American Consultation: (page 45) "Cumming Ranch area is a sensitive area to the Band (San Pasqual Band of Mission Indians) and that they would prefer to see the property preserved as it is." and the consultation is ongoing. Only 8 cultural resource sites (including the

LL-38 sites human bones were discovered) are preserved out of 22 cultural resource sites found in Area A.

LL-39 The EIR is incomplete and is lacking in more comprehensive information as to how to adequately excavate and record the bedrock and boulders with milling that will be lost during grading and construction. The potential impact of the project site including OSE is significant; therefore as much data as possible should be included in the EIR.

-Conclusion-

No Build Alternative should be seriously considered because of its significant, irreversible environmental impact if the Cumming Ranch development is allowed to continue with their project. No Build Alternative is the most suitable for this location.

LL-40 No Build Alternative will provide tremendous advantages over other alternatives. Environmental, the land will continuously contribute the following: clean air, clean water, a dark starry sky, which Ramona is famous for, beautiful aesthetic visual quality, peaceful quiet atmosphere, habitats for endangered and sensitive species-both animals and plants, and finally the protection of prehistoric cultural resources.

Our neighboring citizens oppose the Cumming Ranch project because of the following reasons, which summarize the real residents' voice of Ramona:

LL-41 • Incompatible Urban development in a Rural area damages the Community Character of the surrounding neighborhoods.
• One of the primary reasons we chose Ramona was because of the low-density rural quality. Cumming Ranch has no right to rob us of our enjoyment and quality of life.

LL-42 To cite Chris Basilevac, "Because of its size, quality and location, Cumming Ranch will play an important part of the reserve of the County's MSCP -Multiple Species Conservation Program." (Chris Basilevac: Senior Project Director, California South Coast and Deserts Region, the Nature Conservancy)

LL-43 For the sake of Ramona's future, the Cumming Ranch site should be made available to the Nature Conservancy or a part of the Ramona Grassland Preserve. Ramona is not like other city's vacant lot. The land along Highland Valley contains important biological and cultural resources and irreplaceable natural values — earth's gift to Ramona. But once this is destroyed, it will be gone forever, replaced by hundreds of houses. The damage done by the developer is irreversible for future generations of all the natural resources, species and habitat. Mitigation is not a fix. Mitigation is merely man's excuse to forget about the damage.

LL-44 It is not about the developer's right to do whatever he wishes; this is not about the profit he will make, or how much money the County gets in taxes. It is about the larger picture. It is about the balance between nature and man and keeping the heart of Ramona undisturbed as much as possible. As current residents of Ramona who are interested in protecting nature and land, we want to preserve an extraordinary place to live. This is an important obligation not only for us, but for everyone.

No Build Alternative is the most suitable for this location;
however, if the project proponent prioritizes his commercial benefit over global environmental benefit, then **Reduced Project Alternative** is more suitable than the current proposal. For the Reduced Project Alternative, as neighboring residents, the conditions of approval are as follows:

Conditions of Approval:

1) The Cumming Ranch lot size should be 4 acre minimum in order to maintain a reasonable transition to the adjoining properties, and to be consistent with rural community character. All lots shall accommodate a septic system.

2) Reduce the number of houses thereby reducing light pollution.

LL-45 3) The biologically sensitive habitat loss should be zero acres. This means that the housing area should be planned to avoid such biologically valuable locations such as Coastal Sage Scrub. As opposed to the conventional proposed plan, the Green Infrastructure (Benedict & McMahon, 2002) could be used to preserve the rural character and to protect natural resources, at the same time, providing efficient land use strategies and development patterns that support social and economic needs of the community. This can be a win-win situation.

4) To minimize biologically sensitive habitat loss and maintain a reasonable transition to the adjoining properties, the rear yard setbacks for the proposed homes (current proposed parcel #40 through #52, and #62 through #67) adjacent to the existing homes should be at least 100 feet minimum.

5) Trees should be spaced and planted every 10 feet along the property line inside the Cumming Ranch property in order to block the invasion of so many new residences and also the light pollution caused by the incursion of so many houses, as well as buffer the noise accompanied with clustered housing (the property line along current proposed parcel #40 through #52, and #62 through #67). A combination of the fast growing California native trees that grow at least 30' tall, including Cottonwood (Populus Fremontii) and Elderberry (Sambucus mexicana) and Valley Oak (Quercus lobata) are specifically requested. The first 5 years must be on an irrigation system until established, preferably starting with a 5 gallons or larger, and 6 feet or taller to start. Cumming Ranch's CC&R and/or HOA rules should clearly state that the trees shall be permanently protected so residents of Cumming Ranch will not intentionally or accidently cut down, eliminate, or replace them for other types of trees.

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San Diego County
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Sincerely,

Bill Butler (signature)

Bill Butler (print name) 12-19-2010 (date)

17830 Hwy 67 Ramona, CA 92065
(address)

cc: Dianne Jacob
District 2, County Board of Supervisor

From: Susie Amundson <susie_pyro@yahoo.com>
To: dianne.jacob@sdcounty.ca.gov; larry.hofreiter@sdcounty.ca.gov
Sent: Mon, December 20, 2010 2:11:05 PM
Subject: Comments on the Proposed Cumming Ranch Project DEIR GPA 03-007, SP 03-005, TM 5344, STP 10-007, REZ 07-002, LOG NO. 03-09-028, SCH. NO. 2004031136

Dear Ms. Jacob and Mr. Hofreiter,

After reviewing the DEIR for the Cummings Ranch Project in great detail, I feel that I must share my concerns with you.

1) Lack of infrastructure

MM-1

I do not have to tell you that Highway 67 has been identified as one of the deadliest roads in California. I live on Adrienne Way, which is off Highland Valley Road, 1 mile west of Highway 67. Many people attempt to skirt the backed-up traffic by turning off the 67 at Archie Moore and taking Highland Valley Road to the light. In the morning and late afternoon, I have difficulty getting onto Highland Valley Road. Again, this is one mile away from the intersection. A typical 10 minute trip to Stater Bros. in Ramona took me 40 minutes on a day I was cooking and needed a missing ingredient. I left my home at 4:10 pm. I feel like I take my life into my hands every time I need to travel to Poway or Scripps Ranch. It gets even worse at night because people are actually crazy enough to pass on the 67 between Ramona and Poway! Add in a handful of drunk drivers, and you get the picture. I feel that NO new developments should be approved until Highway 67 can be converted to 4 lanes from Ramona to Scripps Poway Parkway. It appears there is enough land to do this.

MM-2

Water is a precious resource here in Southern California. We have neighbors who are buying & hauling water because their wells have gone dry or become contaminated. The well on this property went dry a year before we purchased our home. The previous owner connected to the water district's service. We have low water pressure, and I question the safety of our water. I left a glass in front of the kitchen window with about an inch of water in it, and went away for the weekend. When I returned, I discovered green algae growing in the glass. I now drink only bottled water.

Where does the developer expect to find water for 125 homes? Private wells will not be an option. How will 125 additional homes affect the already poor quality and low pressure of the Municipal Water District's system?

MM-3

It is common knowledge that the Ramona Sewer District is over capacity. It doesn't work. Period. The septic system here was installed in 2005 and was last pumped in March 2010. When we had rain in October, the toilets wouldn't flush. I have the same problem today with the current rainstorm. So, what happens with the ground and aquifer when we add 125 houses? And, I read in the Ramona Sentinel that he's now considering spray fields here? That's just crazy. I strongly feel that NO development should be constructed in this valley without its own sewer system. This is done back East, and it is the only viable option that I believe will work in this area.

Letter MM
Susie Amundson

MM-1
This comment provides a description of traffic conditions along SR 67 as experienced by the commenter. The County of San Diego concurs that portions of the SR 67 corridor have traffic operating conditions of LOS F and a poor safety record. The traffic generated by the Cumming Ranch project would add additional traffic volume to this roadway. However, as detailed in Section 2.1.5 of the Draft EIR, as mitigation, the proposed project would be required to contribute funds for improvements planned for the SR 67 corridor that would improve operation and safety. Caltrans concurs with proposed mitigation required for this project; see Comment B-3.

MM-2
This comment provides a description of the water supply problems experienced by the commenter and her neighbors. Wells are not proposed as part of the project. As identified in Section 3.6 of the Draft EIR, water would be supplied by the Ramona Municipal Water District (RMWD). RMWD has indicated on their service availability forms that water supply would be available for the project and the planned improvements to their water supply system are identified within Section 3.6 of the Draft EIR. It is the responsibility of the water district to maintain adequate pressure within their systems. Mitigation Measures M-PS-2 and M-PS-5 require that County approval of Final Map for the Cumming Ranch project shall not occur until after RMWD has provided a commitment of water supply to serve the project and that the project developer shall be required to pay all service fees as determined by RMWD.

MM-3
This comment provides a description of the commenter's experience with the local sewer system. RMWD is currently in the process of making improvements to expand the capacity of the Santa Maria Wastewater Treatment Plant, which would serve the project. The Cumming Ranch project has been included in the RMWD planned capacity for sewer service as described in Section 3.6 of the Draft EIR. Mitigation Measures M-PS-3 and M-PS-6 require that County approval of Final Map for the Cumming Ranch project shall not occur until after RMWD has provided a commitment of wastewater treatment capacity to serve the project and that the project developer shall be required to pay all service fees as determined by RMWD. A private sewer system for the project is not considered appropriate as the project site is adjacent to the Santa Maria Wastewater Treatment Plant and it will have capacity to serve the project demand prior to project operation.

2) Inconsistent use

I moved to Ramona in March of 2010 from Central New York state. While living in rural Steuben County, I also owned a vacation cottage on Pine Creek (PA Grand Canyon). I spent 7 months searching for property in San Diego County where I could enjoy a serene, quiet, rural environment. My hobbies are birding, hiking, biking and kayaking. The property we purchased on Adrienne Way is a perfect fit.

MM-4

We can watch the stars at night with our telescope. When we turn the lights out at night, the house is dark, quiet and peaceful which leads to healthy sleep. All of the neighboring properties have acreage. I think we are one of the smaller properties with 2.5 acres. We have emus, chickens, peacocks, a small herd of buffalo, horses, a Brahma bull, a wildlife rescue (Project for Animals), and a grasslands research institute for our neighbors. A housing development is just not consistent with this area. I believe it will decrease the value of the surrounding properties, many of which are very unique. The noise and light pollution will result in loss of use and enjoyment of our property.

3) Loss of habitat

I have been observing birds and wildlife in the open space directly behind my house. With an excellent pair of binoculars and a zoom lens, I have been documenting the birds and animals who rely on this space. I have also spent time hiking in the coastal sage scrub and boulders directly behind my house. I went through my birding journal last evening and made a list of the birds and creatures I have observed JUST ON THIS 12 ACRES. This list is attached.

MM-5

While looking at the list, I came to the realization that the area behind us is a pristine and completely self-sustaining ecosystem. I have yet to document the many wildflowers, trees and plants because I've been spending so much time identifying the birds. I have 5 or 6 smaller birds to be identified.

I send photos to the California Audubon Society for assistance and verification. I had the thrill of my life and am fortunate to see a mountain lion twice. He/she passes through this area about every 4-5 weeks. We can tell when its behind our home because our dogs act weird and the coyotes disappear. We can hear the cat in the evening. After 2 or 3 days, it moves on. The thought of losing this treasure just makes me want to cry. When people, dogs, cats, kids, lawn chemicals, etc. are brought to this area, it will be the end of this critical habitat.

4) Who are the home owners?

MM-6

As I'm sure you realize, there are very few jobs in Ramona. Hence the traffic on the 78 and 67 as people must travel to other areas for work. I am a consultant and realtor and am fortunate to work from my home. My husband travels back & forth to Solana Beach daily. With no jobs here, and the 3 main routes (78, 67 & Highland Valley) being crowded, twisting, 2-lane

MM-4

This comment provides a description of the commenter's property and activities. The project is rural residential in character and though denser than some of the surrounding rural residential properties, is generally compatible with the local area and is consistent with the planned growth for the Ramona community. As described on page 1-14 of the Draft EIR, animal keeping would be allowed where appropriate within the Cumming Ranch project, including corrals, barns, or stables. As described in Section 3.3, Noise, all noise generated by the project would be mitigated to below a level of significance and below applicable County Noise Ordinance levels. As described in Section 3.4 of the Draft EIR, no street lighting is proposed for the Cumming Ranch project, either on internal roads, or on Highland Valley Road or SR 67. Minimal lighting may be incorporated at each of the four project entrance roads for visibility and safety of turning vehicles. The only other light generated by the development would be from security or landscape lighting at each home, or from vehicle headlights traveling within Cumming Ranch. Light sources at the homes would be minimal and would be subject to the requirements of the Light Pollution Code as well as the project design guidelines.

MM-5

The commenter describes her local birding experience, observations, and documentation of wildlife in the project vicinity. The attached log of observed wildlife is noted. The proposed project considers the biological resources listed in the comment in Section 3.1 of the Project EIR as being known to the project site or general area. Section 3.1 of the Project EIR provides detailed analysis regarding wildlife species, including bird and raptor species, on the project site and within the surrounding grasslands and found that potential impacts would be less than significant with appropriate mitigation, including designation of 457.4 acres of the project site (67 percent) as open space. Significant impacts to biological species are identified in the Project EIR, including indirect impacts from project operation (such as pets), and mitigation is provided for those impacts. Mitigation was found to reduce potential impacts to the biological resources to less than significant, as detailed in Section 3.1.6.

MM-6

The economic viability of the project is not a topic of CEQA analysis. The fact that a majority of homeowners would likely commute to the San Diego area for employment is accounted for within the traffic analysis through the trip distribution during peak hours. As described in the EIR Project Description, the project is phased and homes could be developed per demand, thus minimizing potential for early or unnecessary disturbance of land as indicated by the comment. The commenter's expertise and opinion as a local realtor are noted and included in the Final EIR for consideration by the decision makers.

roads, who are the targeted potential buyers of these homes? As a realtor, I ask myself ...

Why would someone want to buy into a high-density cookie cutter neighborhood in Ramona with a dangerous commute to/from work? There are plenty of comparable options closer to San Diego, especially with the current economy and real estate market. We are easily looking at another year or two of short sales and foreclosure sales. That is the lion's share of our business. And, we have the Montecito Ranch project moving forward with 417 new homes. These homes will be on larger lots and this development will have its own sewer facility. I would like to see if this development is able to attract 417 new home owners before a second development is considered.

MM-6 cont

I believe this development is very risky and has a high probably of failure. My concern is that the land and habitat will be destroyed, the project will be abandoned, and the neighborhood will be left dealing with the ugly aftermath.

MM-7

For the above reasons, I respectfully request three things from you:

1) Do not allow the development of the Cummings Ranch

MM-8

2) Work with the developer of Montecito Ranch to gain funds (through Mello-Roos) for the widening & improvement of Highway 67

MM-9

3) Visit our neighborhood to see this pristine environment first hand

Respectfully yours,
Susan Amundson

16611 Adrienne Way
Ramona, CA 92065

Attached: Species seen on the Cummings Ranch site

MM-7
The commenter's request is noted and will be included in the project's preliminary Final EIR for the decision makers to consider.

MM-8
This comment addresses another local project that is independent of the Cumming Ranch project and does not provide comment on the adequacy of the Cumming Ranch EIR. No additional response is required.

MM-9
The commenter's request for decision makers to visit the project area is noted and will be included in the project's preliminary Final EIR for the decision makers to consider.

From my Birding Journal: species seen on the Cummings Ranch in the open space behind my home on Adrienne Way (South of Highland Valley, east of Adrienne Way, 12 acres of Coastal Sage Scrub).

Allen's hummingbird
California spotted towhee
Barn owl
Golden eagle
Immature bald eagle (2)
Costa's hummingbird
Yellow-headed blackbird
Magnificent hummingbird
Black-chinned hummingbird
California gnatcatcher
Mountain bluebird
Great egret
Western bluebird
Cassin's kingbird
Lesser nighthawk
Great blue heron
Burrowing owl
Southwestern willow flycatcher
Great horned owl
California towhee
Cliff swallow
Turkey vulture
Pair of nesting Coopers hawks
Ferruginous hawk
Red-shouldered hawk
Red-tail hawk
Western meadowlark
Horned lark
Says phoebe
Black phoebe
Breeding pair of white-tailed kites
Kestral
American crow
Raven
Bewicks wren
Bushtit
Bell's vireo
Lazuli bunting
Hooded oriole
Tricolored blackbird
Cattle egret

Two species of falcons, waiting for identification from Ramona Wildlife Research Institute;
3 species of woodpeckers, waiting for identification.

I have also seen the following animals. I added these to my journal because they are creatures I have not seen before moving to CA:

Mountain lion (twice, fresh scat & tracks seen Nov. 26, 2010)
Coyotes
Ground squirrels
Long tailed weasel
California legless lizard
A tailed frog or toad, waiting for identification
California king snake
Gopher snake
Black widow spider
San Diego alligator lizard
Tarantula
Robin moth
SW speckled rattlesnake
Desert cottontail
Brush rabbit

ATTACHMENT 1
OPEN SPACE EASEMENT FIGURE

Source: Snipes Dye Associates 2012

LAND USE AREA CALCULATIONS *

AREA 'A' - RESIDENTIAL & OPEN SPACE

RESIDENTIAL LOTS	188.2 ACRES
RESIDENTIAL STREETS	24.3 ACRES
H.O.A. LOTS	2.1 ACRES
R.M.W.D. PUMP LOT	0.4 ACRES
TOTAL RESIDENTIAL	215.0 ACRES
OPEN SPACE **	143.7 ACRES
TOTAL AREA A	358.7 ACRES

AREA 'B' - OPEN SPACE

201.0 ACRES

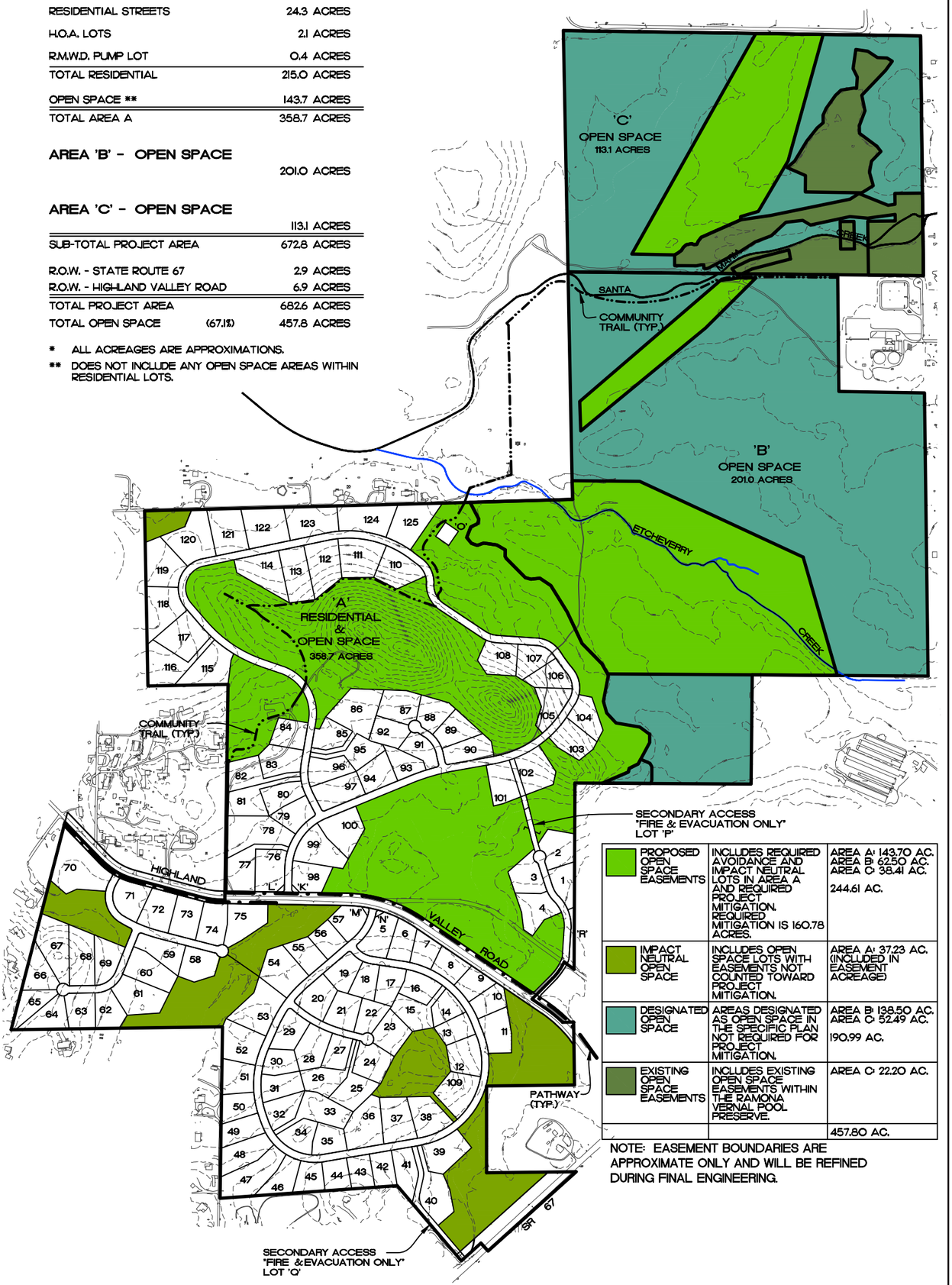
AREA 'C' - OPEN SPACE

113.1 ACRES

SUB-TOTAL PROJECT AREA	672.8 ACRES
R.O.W. - STATE ROUTE 67	2.9 ACRES
R.O.W. - HIGHLAND VALLEY ROAD	6.9 ACRES
TOTAL PROJECT AREA	682.6 ACRES
TOTAL OPEN SPACE (67.1%)	457.8 ACRES

* ALL ACREAGES ARE APPROXIMATIONS.

** DOES NOT INCLUDE ANY OPEN SPACE AREAS WITHIN RESIDENTIAL LOTS.



PROPOSED OPEN SPACE EASEMENTS	INCLUDES REQUIRED AVOIDANCE AND IMPACT NEUTRAL LOTS IN AREA A AND REQUIRED PROJECT MITIGATION. REQUIRED MITIGATION IS 160.78 ACRES.	AREA A: 143.70 AC. AREA B: 62.50 AC. AREA C: 38.41 AC. 244.61 AC.
IMPACT NEUTRAL OPEN SPACE	INCLUDES OPEN SPACE LOTS WITH EASEMENTS NOT COUNTED TOWARD PROJECT MITIGATION.	AREA A: 37.23 AC. (INCLUDED IN EASEMENT ACREAGE)
DESIGNATED OPEN SPACE	AREAS DESIGNATED AS OPEN SPACE IN THE SPECIFIC PLAN NOT REQUIRED FOR PROJECT MITIGATION.	AREA B: 138.50 AC. AREA C: 52.49 AC. 190.99 AC.
EXISTING OPEN SPACE EASEMENTS	INCLUDES EXISTING OPEN SPACE EASEMENTS WITHIN THE RAMONA VERNAL POOL PRESERVE.	AREA C: 22.20 AC.
		457.80 AC.

NOTE: EASEMENT BOUNDARIES ARE APPROXIMATE ONLY AND WILL BE REFINED DURING FINAL ENGINEERING.

ATTACHMENT 2
CALTRANS SR 67 ENGINEERING OVERVIEW

State Route 67
Ramona Community Outreach
Engineering Overview Update

State Route 67 (SR-67) Timeline Overview:

- March 31, 2009 - California Highway Patrol (CHP) kicks off "Arrive Alive" SR-67 DUI Safety Task Force in conjunction with the Department of Transportation (Department) and the Office of Traffic Safety (OTS) with a Press Conference.

- May 28, 2009 - "Arrive Alive" Task Force convenes first meeting with participation from various community organizations, schools, political representatives and government agencies.

- July 10, 2009 – Department completes a project Study Report – Project Development Support (PSR-PDS) in support of SANDAG's 2030 Regional Transportation Report for the widening of SR-67 to a 4-lane conventional highway.

- July 2009 – The Department begins work on a Project Study Report to study potential median barrier locations and other alternatives along the corridor.

- July 19, 2009 – The Department presents jointly with the California Highway Patrol to SANDAG on SR 67 topics such as the "Arrive Alive" DUI Safety Campaign, previous safety projects, previous and ongoing current educational campaigns, possible segments to study for construction of a median barrier.

- July 23, 2009 – "Arrive Alive" Task Force convenes for a second meeting and takes a guided bus tour of SR-67. A questionnaire is provided to Task Force members for comments and suggestions for improvement. CHP will compile information for a future meeting.

- August 14, 2009 - The Department met with residents of the State Route 67 (SR-67) corridor which included the communities of Lakeside, El Cajon and Ramona, as well as representatives from various community planning groups, school boards and the California Highway Patrol (CHP) to discuss a number of topics of interest to the community. The primary focus of the meeting was to gain input from the community regarding possible installation of median barrier on some segments of the corridor.

    - The community requested the Department review options for improvements at SR-67 and Archie Moore Road, SR-67 and Highland Valley Road / Dye Road, the addition of other traffic signals along the corridor, and possible impacts a median barrier may have on the residents living along the corridor.

- November 19, 2009 - "Arrive Alive" Task Force holds third meeting and CHP reported a 30% reduction in collisions compared to the 2007 baseline year for the same period (April 1 – September 30, 2009) of time and a 100% reduction in fatal collisions to date compared to the same period in 2007.

- December 3, 2009 – The Department reported back to the community regarding options for improvements at SR-67 and Archie Moore Road, SR-67 and Highland Valley Road / Dye Road, the addition of other traffic signals along the corridor, and possible impacts a median barrier may have on the residents living along the corridor.

- 2011 – SANDAG 2050 RTP adopted.

- May 2011 – Department finished PSR analyzing median barrier options on SR 67 corridor.

SR-67 Corridor Funding Outlook:

Near-Term (1-2 years)

- April 1, 2009 – 2009 Ten- Year SHOPP Plan approved. The Department currently has no funding allocation or foresees any being available from State or Federal resources to address any operational improvements for a minimum of 2 years.
- County Traffic Impact Fee (TIF) and Developer financed improvements may be available as projects are approved at the County level.

Mid-Term (3-10 Years)

- Minimal SHOPP funding for operational improvements that do not expand the design capacity of the system and are intended for spot congestion may be available for SHOPP funding.
- County Traffic Impact Fee (TIF) and Developer financed improvements may be available as projects are approved at the County level.

Long-Term (10-20 Years)

- November 30, 2007 – SANDAG 2030 RTP adopted.
- SANDAG funding under the Reasonably Expected Revenue forecast which includes funding sources such as TRANSNET, Regional Transportation Congestion Improvement Program (RTCIP), Gas Tax, Toll Road Funds and others, anticipates widening of SR-67 from a 2-lane conventional highway to a 4-lane conventional highway.
- 2011 – SANDAG 2050 RTP adopted.

Operational Improvement Projects

SR-67 and Dye / Highland Valley Road Intersection Improvements (Mid-Term/Long-Term)

- The Department is currently reviewing preliminary plans for operational improvements to the intersection that have been submitted by private developers as part of Traffic Impact Studies.
- Mid-Term intersection improvements may be eligible for County TIF funds and developer financed mitigation improvements.
- Preliminary plans call for adding additional through lanes on SR- 67, an additional left turn lane on Dye Road, and increasing turning lane lengths.
- Long-term operational improvements would most likely be part of the SANDAG funded widening project.

SR 67 and Archie Moore Road (Mid-Term/Long-Term)

- The Department implemented safety improvements in 2002 at the intersection that have significantly reduced collisions at this intersection. However, traffic is still congested near Archie Moore Road to Highland Valley Road / Dye Road in the evening commute period, increased traffic on Archie Moore Road from drivers trying to use the back roads to reach the Highland Valley Road / Dye Road intersection quicker, and increased rear-end type collisions that are typical on facilities experiencing congestion may be improved with the proposed operational improvements to the Highland Valley Road / Dye Road intersection.
- Mid-term intersection improvements may be eligible for County TIF funds and developer financed mitigation improvements.

- Long-term operational improvements would most likely be part of the SANDAG funded widening project.

SANDAG 2030 Regional Transportation Plan SR 67 Widening (Long-Term)

- As part of SANDAG's 2030 and 2050 Regional Transportation Plan to widen SR-67 to a 4-lane conventional highway from just north of Mapleview Street to just south of Dye / Highland Valley Road, the Department has finished a preliminary report, known as a Project Study Report (PSR), outlining various design alternatives that may be considered as part of the next phase of the project, environmental documentation and final alternatives.
- The report outlines a preliminary "footprint" of the new facility and recommends analysis of various design alternatives and impacts prior to final design selection. The impacts include environmental impacts, future access to the facility, the addition of median barrier in some locations, wider medians or buffers, the addition of turning lanes, and emergency access as well as evacuation in case of a natural disaster such as fires to name a few.
- The 2050 RTP shows a 4-lane conventional highway from Mapleview Street to Scripps Poway Parkway and from Scripps Poway Parkway to Dye / Highland Valley Road if reasonably expected funding becomes available.

Safety Improvements

(Near-Term/Long-Term)

- The Department is studying potential median barrier locations along the corridor.
- The study is also analyzing other alternatives to concrete median barrier such as high tensioned cable barrier, metal median barrier guard, wide medians, the addition of two-way left turn lanes, left turning lanes or pockets and enhanced pavement markings.
- These improvements and enhancements may be part of a future safety project.
- Some alternatives would require reducing capacity of the facility by taking away a northbound or southbound lane in areas with 3 or 4 lanes due to design requirements, right of way constraints and sight distance limitations.
- Environmental impacts, drainage, reduction of access to SR 67 from private driveways, increased response time for emergency services, maintaining a safe evacuation route during a natural disaster, and the potential for increasing collisions overall are concerns that will need to be considered.
- The study was complete in May 2011 and has moved to the Project Report phase of analysis.

Next Steps

- The Department and County can work together to identify potential funding for improvements to the SR-67 Dye and Highland Valley intersection.
- Once these improvements are complete further analysis of the intersection of SR- 67 and Archie Moore Road can be done to determine if further improvements may be necessary and what funding sources may be available.
- The Department is willing to meet with the community as part of the safety improvement study to further discuss various alternatives prior to its completion.

- The Department and County will continue working with SANDAG on the 2050 RTP implementation plan for SR 67.

ATTACHMENT 3
WATER SERVICE PROJECT FACILITY AVAILABILITY FORM

COUNTY OF SAN DIEGO
DEPARTMENT OF PLANNING AND LAND USE: Zoning
PROJECT FACILITY AVAILABILITY FORM, Water

Please type or use pen

805 Properties — Owner's Name
(619) 807-2483 — Phone
7338 Turnford Drive — Owner's Mailing Address — Street
San Diego, CA 92119 — City — State — Zip

ORG_____
ACCT_____
ACT_____
TASK_____
DATE_____
AMT $_____

W

DISTRICT CASHIER'S USE ONLY

SECTION 1. PROJECT DESCRIPTION — TO BE COMPLETED BY APPLICANT

A.
- ☒ Major Subdivision (TM)
- ☐ Minor Subdivision (TPM)
- ☐ Boundary Adjustment
- ☒ Rezone (Reclassification) from S-88 to S-88 zone.
- ☐ Major Use Permit (MUP), purpose:
- ☐ Time Extension...Case No.
- ☐ Expired Map...Case No.
- ☒ Other Site Plan
- ☒ Specific Plan or Specific Plan Amendment
- ☐ Certificate of Compliance:

B.
- ☒ Residential . . . . . Total number of dwelling units 125
- ☐ Commercial. . . . . Gross floor area
- ☐ Industrial . . . . . Gross floor area
- ☐ Other . . . . . Gross floor area

C. ☒ Total Project acreage 682. Total number of lots 135

D. Is the project proposing the use of groundwater? ☐ Yes ☒ No
Is the project proposing the use of reclaimed water? ☐ Yes ☒ No

Assessor's Parcel Number(s) (Add extra if necessary)

282-010-30,43	283-051-01
283-021-01,02	
283-022-01	
283-041-03,09	

Thomas Bros. Page 1172/1152 Grid B3/B7
NW of SR67 at Highland Valley Road — Project address — Street
Ramona — Community Planning Area/Subregion
92065 — Zip

Owner/Applicant agrees to pay all necessary construction costs, dedicate all district required easements to extend service to the project and COMPLETE ALL CONDITIONS REQUIRED BY THE DISTRICT.

Applicant's Signature: Mark [illegible] Date: 4/25/11
Address: 7338 Turnford Drive, San Diego, CA 92119 Phone: (619) 807-2483

(On completion of above, present to the district that provides water protection to complete Section 2 below.)

SECTION 2: FACILITY AVAILABILITY — TO BE COMPLETED BY DISTRICT

District Name: Ramona Municipal Water Dist. Service area

A.
- ☒ Project is in the district.
- ☐ Project is not in the district but is within its Sphere of Influence boundary, owner must apply for annexation.
- ☐ Project is not in the district and is not within its Sphere of Influence boundary.
- ☐ The project is not located entirely within the district and a potential boundary issue exists with the District.

B. ☒ Facilities to serve the project ☒ ARE ☐ ARE NOT reasonably expected to be available within the next 5 years ~~based on the capital facility plans of the district~~. Explain in space below or on attached (Number of sheets)
- ☐ ~~Project will not be served for the following reason(s):~~ [redacted]

C.
- ☒ **District conditions are attached. Number of sheets attached:**
- ☒ **District has specific water reclamation conditions which are attached. Number of sheets attached:**
- ☐ **District will submit conditions at a later date.**

D. ☐ **How far will the pipeline(s) have to be extended to serve the project?**

This Project Facility Availability Form is valid until final discretionary action is taken pursuant to the application for the proposed project or until it is withdrawn, unless a shorter expiration date is otherwise noted. [redacted]

Authorized signature: Phillip Dauben Print name Phillip Dauben
Print title Civil Engineer Phone 760-788-2260 Date 5/17/2011

NOTE: THIS DOCUMENT IS NOT A COMMITMENT OF SERVICE OR FACILITIES BY THE DISTRICT
On completion of Section 2 by the district, applicant is to submit this form with application to:
Zoning Counter, Department of Planning and Land Use, 5201 Ruffin Road, San Diego, CA 92123

Conditions for Water Availability Letter (In District)

a. Water facilities are reasonably expected to become available within five (5) years, if the following conditions are met:

A water commitment agreement is signed by the owner/developer and approved by the District that the owner/developer will assure the district that all actual costs of the facilities required by the project, including, but not limited to, administrative costs, design costs, and construction costs will be paid solely by the owner/developer in a timely fashion. The agreement shall state that the facilities required by the project will need to be completed before any connections shall be made.

b. Developer shall make a deposit (minimum of $2,000) with the District to cover all costs for any planning and system evaluation required by the District for addressing the facilities needed to serve this project. The amount of the deposit may vary depending on the project scope and additional deposit may be needed depending on actual costs. System evaluations typically require 4 to 6 weeks to complete. ***The Water System Evaluation shall be completed and a Water Service Agreement or Pre-Annexation Agreement executed before the Draft California Environmental Quality Act (CEQA) documents are prepared and before the District will sign a "Project Facility Commitment Form".***

c. Water availability and commitment letters are based on current ordinances, resolutions, rules, regulations, specifications, and guidelines of the District. ***Should these ordinances, resolutions, rules, regulations, specification, guidelines, and system conditions change from time to time, the applicant for shall be subject to the requirements in effect at the time of applying for water service.***

Conditions for Reclaimed Water

It is the policy of the Ramona Municipal Water District that reclaimed water shall be used in designated areas within the jurisdiction wherever its use is financially and technically feasible, and consistent with legal requirements, preservation of public health, safety and welfare, and the environment (LC 7.44.020). The conditions for reclaimed water use are as follows:

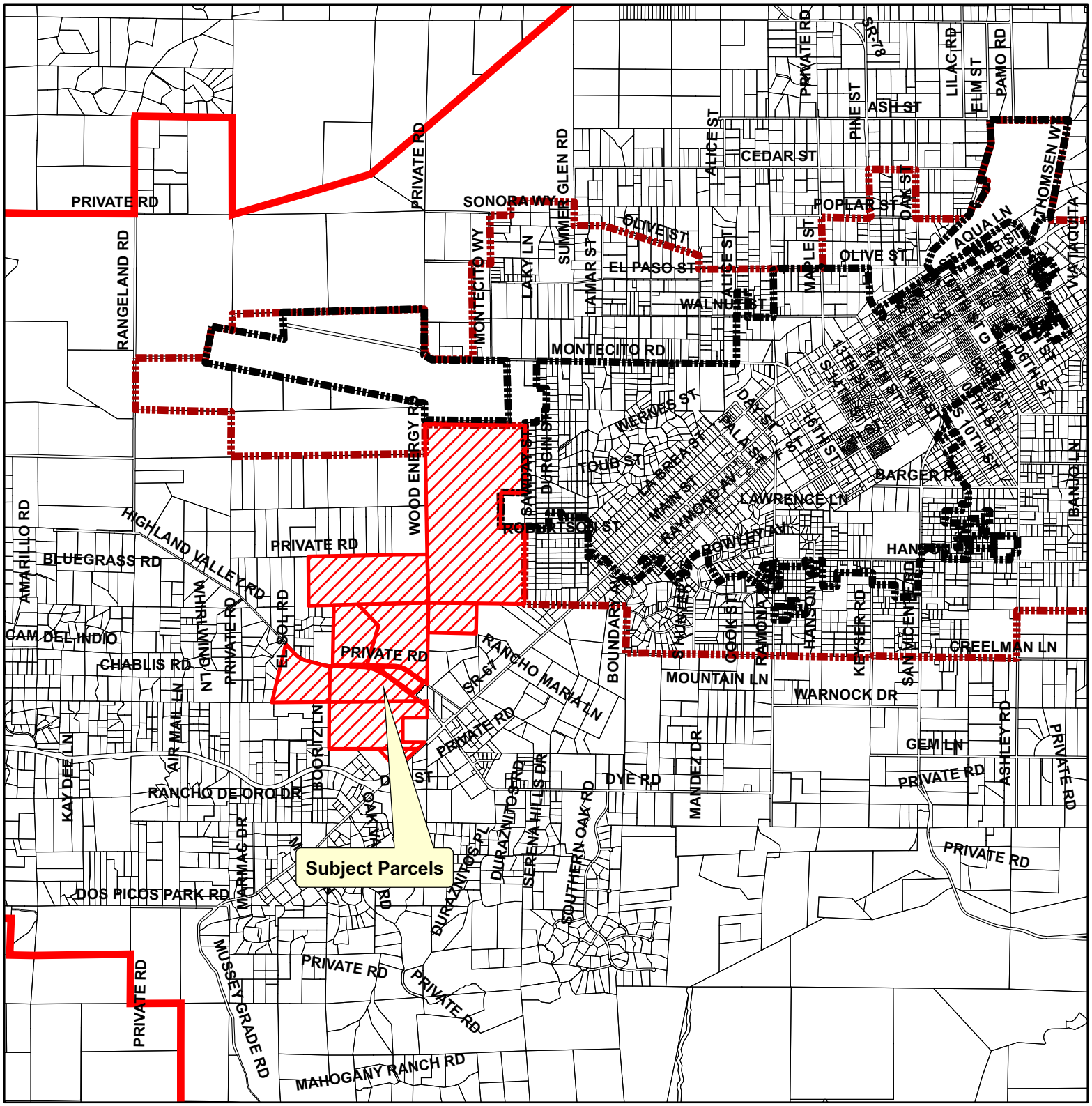
A. A reclaimed water service agreement is signed by the owner/developer and approved by the District that the owner/developer will assure the district that all actual costs of the facilities required by the project, including, but not limited to, administrative costs, design costs, and construction costs will be paid solely by the owner/developer in a timely fashion. The agreement shall state that the facilities required by the project will need to be completed before any connections shall be made.

B. For each reclaimed water service area, an evaluation of whether greenbelt irrigation, commercial office buildings, filling of artificial lakes, or industrial process shall be limited the use of reclaimed water shall be made (LC 7.44.050). The District may mandate construction of reclaimed water distribution systems or other facilities in new developments for current or future reclaimed water use as a condition of any development.

C. Developer shall make a deposit (minimum of $2,000) with the District to cover all costs for any planning and system evaluation required by the District for addressing the facilities needed to serve this project (LC 2.44.020 B). The amount of the deposit may vary depending on the project scope and additional deposits may be needed depending on actual costs. ***The Reclaimed Water System Evaluation shall be completed and a Reclaimed Water Service Agreement executed before the Draft California Environmental Quality Act (CEQA) documents are prepared and before the District will sign a "Project Facility Commitment Form".***

D. Reclaimed water requirements and conditions are based on the current ordinances, resolutions, rules, regulations, specifications, and guidelines of the District. ***Should these ordinances, resolutions, rules, regulations, specification, guidelines, and system conditions change from time to time, the applicant for shall be subject to the requirements in effect at the time of applying for reclaimed water service.***

Vicinity Map
Cumming Ranch
Highland Valley Road & SR-67
Owner: 805 Properties

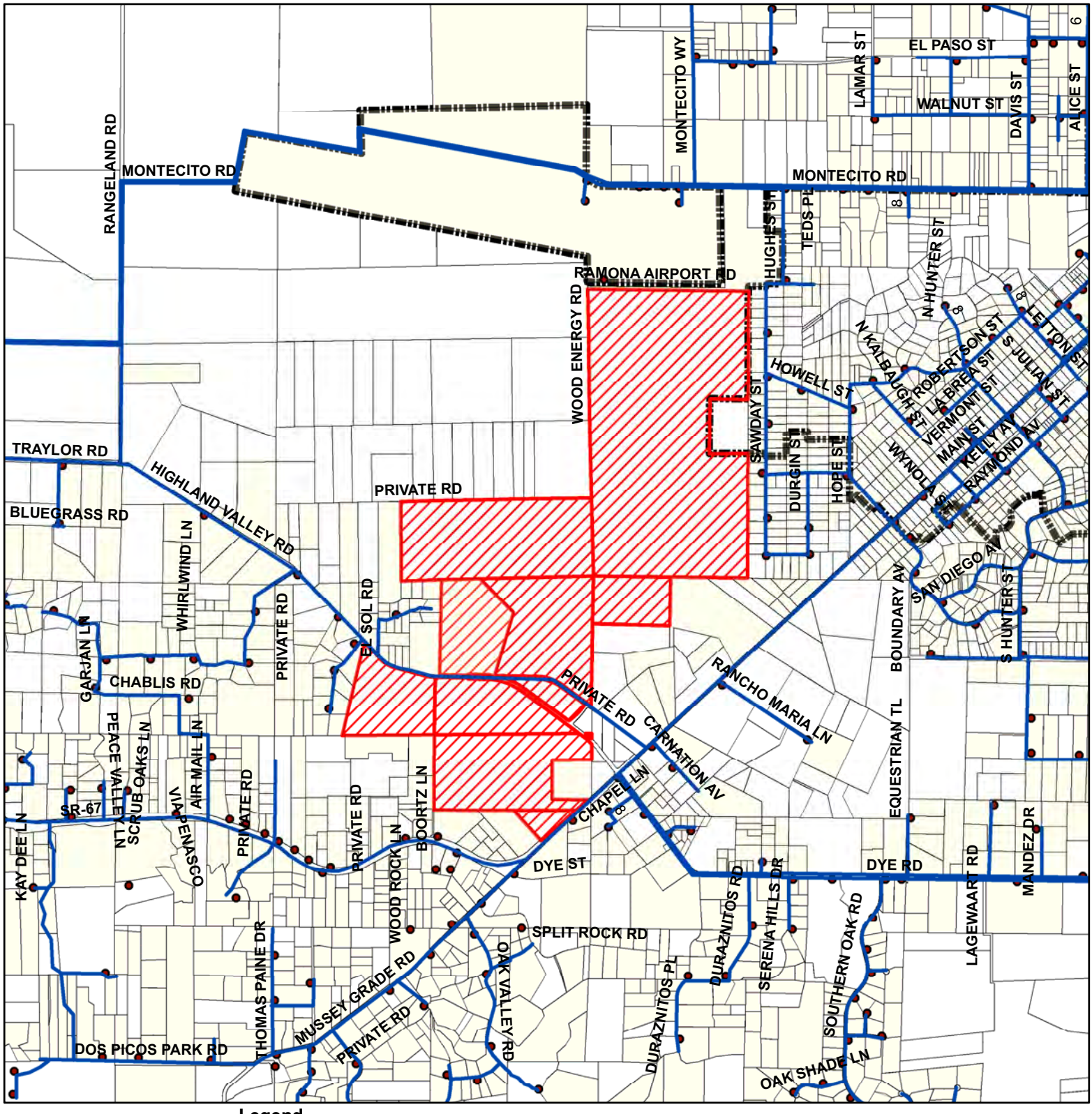


Legend

- RMWD Boundary
- Santa Maria Sewer Service Area
- Active Latent Powers Boundary
- Subject Parcel selection

N
W E
S

Facility Map
Cumming Ranch
Highland Valley Road & SR-67
Owner: 805 Properties



Legend

- RMWD Boundary
- Santa Maria Sewer Service Area
- Water System
- Fire_Hydrants
- All Water Meters
- Subject Parcel selection

N
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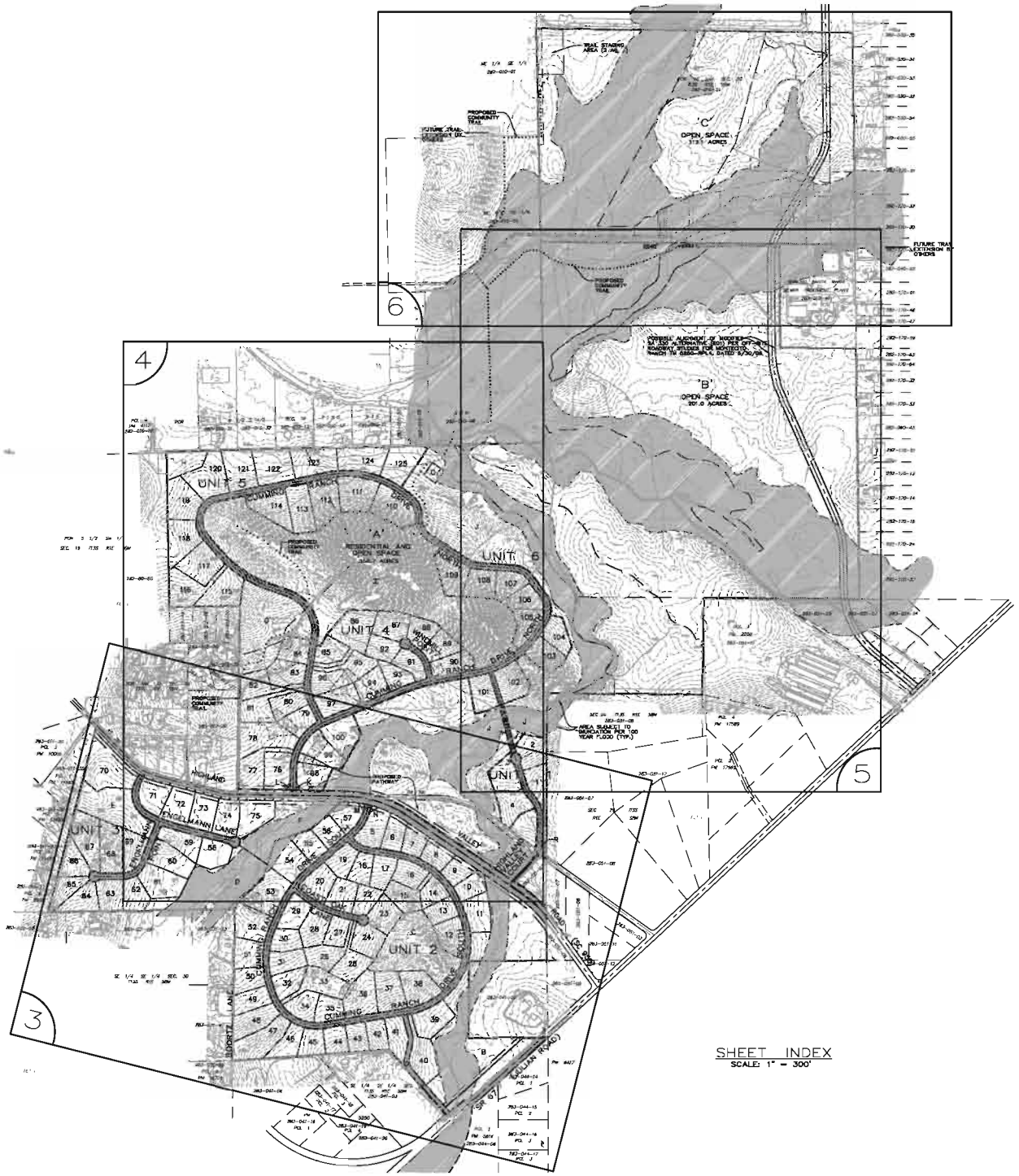
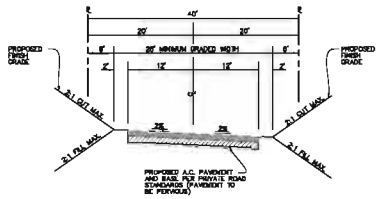
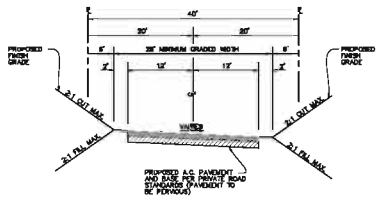
S

COUNTY OF SAN DIEGO TRACT NO. 5344 RPL 4
CUMMING RANCH TENTATIVE MAP





SECONDARY ACCESS ROAD
"FIRE AND EVACUATION ONLY"
TYPICAL SECTION – LOT 'P'
NO SCALE



SECONDARY ACCESS ROAD
"FIRE AND EVACUATION ONLY"
TYPICAL SECTION – LOT 'Q'
NO SCALE

SHEET INDEX
SCALE: 1" = 300'

PRELIMINARY GRADING PLAN NOTES:

1. THIS PLAN IS PROVIDED TO ALLOW FOR FULL AND ANCIPATE DISCRETIONARY REVIEW OF A PROPOSED DEVELOPMENT PROJECT. THE PROPERTY OWNER ACKNOWLEDGES THAT ACCEPTANCE OR APPROVAL OF THIS PLAN DOES NOT CONSTITUTE AND APPROVAL TO PERFORM ANY GRADING SHOWN HEREON, AND AGREES TO OBTAIN A VALID GRADING PERMIT BEFORE COMMENCING SUCH ACTIVITY.
2. ALL CUT / FILL SLOPES ARE 2:1 MAXIMUM, UNLESS OTHERWISE SHOWN.
3. ALL LOTS WILL HAVE ACCESS VIA A 16' ASPHALT CONCRETE DRIVEWAY.
4. ALL DRIVEWAYS SHALL BE CONSTRUCTED PER DS-7 WITH A MAXIMUM GRADE OF 20%.
5. SEE TRAFFIC STUDY FOR ALL FUTURE OFF-SITE IMPROVEMENT FOR S.R. 67 AND HIGHLAND VALLEY ROAD.

ENGINEER OF WORK

ENGINEER OF WORK
Snipes-Dye associates
civil engineers and land surveyors
8348 CENTER DRIVE, SUITE G, LA MESA, CA 91942
TELEPHONE (619) 697-9234 FAX (619) 460-2033
WILLIAM A. SNIPES R.C.E. 45577
EXPIRES 09-30-08

NO	DATE	REVISION DESCRIPTION	BY	APP
1	1/14/03	REVISE PER INITIAL RESPONSE LETTER	MHS	
2	7/15/03	REVISE PER SECOND RESPONSE LETTER	MHS	
3	12/17/03	REVISE PER THIRD RESPONSE LETTER	MHS	
4	10/24/06	REVISE PER FOURTH RESPONSE LETTER	MHS	

SHEET 2 OF 2 SHEETS

TENTATIVE MAP 5344 RPL 4
CUMMING RANCH

SNIPES-DYE ASSOCIATES
civil engineers and land surveyors
8348 CENTER DRIVE, SUITE G, LA MESA, CA 91942-2910 (619) 697-9234, FAX (619) 460-2033

ER 03-09-028 TM 5344-

ATTACHMENT 4
SEWER SERVICE PROJECT FACILITY AVAILABILITY FORM

COUNTY OF SAN DIEGO
DEPARTMENT OF PLANNING AND LAND USE: Zoning
PROJECT FACILITY AVAILABILITY FORM, Sewer

Please type or use pen

805 Properties (619) 807-2483
Owner's Name Phone

7338 Turnford Drive
Owner's Mailing Address Street

San Diego, CA 92119
City State Zip

ORG_____
ACCT_____
ACT_____
TASK_____
DATE_____ AMT $_____

S

DISTRICT CASHIER'S USE ONLY

SECTION 1. PROJECT DESCRIPTION — TO BE COMPLETED BY APPLICANT

A.
- [x] Major Subdivision (TM)
- [ ] Minor Subdivision (TPM)
- [ ] Specific Plan or Specific Plan Amendment
- [ ] Rezone (Reclassification) from S-88 to S-88 zone
- [x] Major Use Permit (MUP), purpose:
- [x] Time Extension...Case No.
- [ ] Expired Map...Case No.
- [x] Other Site Plan
- [ ] Certificate of Compliance:
- [ ] Boundary Adjustment

B.
- [x] Residential . . . . . Total number of dwelling units 125
- [ ] Commercial. . . . . Gross floor area
- [ ] Industrial . . . . . Gross floor area
- [ ] Other . . . . . Gross floor area

C. Total Project acreage 682.6 Total lots 135 Smallest proposed lot 1.0 acre

D. Is the project proposing its own wastewater treatment plant? Yes [ ] No [x]
Is the project proposing the use of reclaimed water? Yes [ ] No [x]

Assessor's Parcel Number(s)
(Add extra if necessary)

282-010-30,43	283-051-01
283-021-01,02	
283-022-01	
283-041-03,09	

Thomas Bros. Page 1172/1152 Grid B3/B7
NW of SR67 at Highland Valley Road
Project address Street
Ramona 92065
Community Planning Area/Subregion Zip

Owner/Applicant agrees to pay all necessary construction costs and dedicate all district required easements to extend service to the project.
OWNER/APPLICANT MUST COMPLETE ALL CONDITIONS REQUIRED BY THE DISTRICT.

Applicant's Signature: Mark Turnford Date: 4/25/11
Address: 7338 Turnford Drive, San Diego, CA 92119 Phone: (619) 807-2483

(On completion of above, present to the district that provides sewer protection to complete Section 2 below.)

SECTION 2: FACILITY AVAILABILITY — TO BE COMPLETED BY DISTRICT

District name Ramona Municipal Water Dist Service area

A.
- [ ] Project is in the District.
- [x] Project is not in the District but is within its Sphere of Influence boundary, owner must apply for annexation.
- [ ] Project is not in the District and is **not** within its Sphere of Influence boundary.
- [ ] Project is not located entirely within the District and a potential boundary issue exists with the _____ District.

or within the Activated Sewer Powers

B. [x] Facilities to serve the project [x] ARE [ ] ARE NOT reasonably expected to be available within the next 5 years based on the capital facility plans of the district. Explain in space below or on attached. Number of sheets attached:
- [ ] Project will not be served for the following reason(s):

Based on Sewer System Evaluation (See attached conditions)

C.
- [x] **District conditions are attached. Number of sheets attached:** 1
- [x] **District has specific water reclamation conditions which are attached. Number of sheets attached:** 1
- [ ] **District will submit conditions at a later date.**

D. [ ] **How far will the pipeline(s) have to be extended to serve the project?**

This Project Facility Availability Form is valid until final discretionary action is taken pursuant to the application for the proposed project or until it is withdrawn, unless a shorter expiration date is otherwise noted. Expires: 5/17/2013

Phillip Dauben — Phillip Dauben
Authorized signature *Print name*

Civil Engineer — 760-788-2260 — 5/17/2011
Print title *Phone* *Date*

NOTE: THIS DOCUMENT IS NOT A COMMITMENT OF FACILITIES OR SERVICE BY THE DISTRICT. On completion of Section 2 by the district, applicant is to submit this form with application to: Zoning Counter, Department of Planning and Land Use, 5201 Ruffin Road, San Diego, CA 92123

Conditions for Sewer Availability Letter (Not in the Active Sewer Powers)

a. The project is not within the Sewer Service Area and not within its Active Sewer Powers.

b. Sewer facilities are not reasonably expected to become available within five (5) years unless the following conditions are met:

i. If a pre-annexation and/or pre-latent powers expansion agreement is signed by the owner/developer and approved by the District's Directors whereby the District will request consideration from LAFCO to expand the latent sewer powers to include the project area and the owner/developer will assure the district that all actual costs of the facilities required by the project, including, but not limited to, administrative costs, design costs, construction costs and the cost of a percentage of the value of the existing facilities, will be paid solely by the owner/developer in a timely fashion. The pre-annexation and/or pre-latent powers expansion agreement should state that the facilities required by the project will need to be completed before any connections shall be made.

ii. If the District adopts a resolution applying to LAFCO for expansion of its latent sewer powers to include the area.

iii. If LAFCO approves the annexation and/or the expansion of latent powers to include the area.

c. Developer shall make a deposit (minimum of $2,000) with the District to cover all costs for any planning, system evaluation, and annexation required by the District for addressing the facilities needed to serve this project. The amount of the deposit may vary depending on the project scope and additional deposit may be needed depending on actual costs. ***The Sewer System Evaluation shall be completed and a Sewer Service Agreement or Pre-Annexation Agreement executed before the Draft California Environmental Quality Act (CEQA) documents are prepared and before the District will sign a "Project Facility Commitment Form".***

d. Sewer availability and commitment letters are based on current ordinances, resolutions, rules, regulations, specifications, and guidelines of the District. ***Should these ordinances, resolutions, rules, regulations, specification, guidelines, and system conditions change from time to time, the applicant for shall be subject to the requirements in effect at the time of applying for water service.***

Conditions for Reclaimed Water

It is the policy of the Ramona Municipal Water District that reclaimed water shall be used in designated areas within the jurisdiction wherever its use is financially and technically feasible, and consistent with legal requirements, preservation of public health, safety and welfare, and the environment (LC 7.44.020). The conditions for reclaimed water use are as follows:

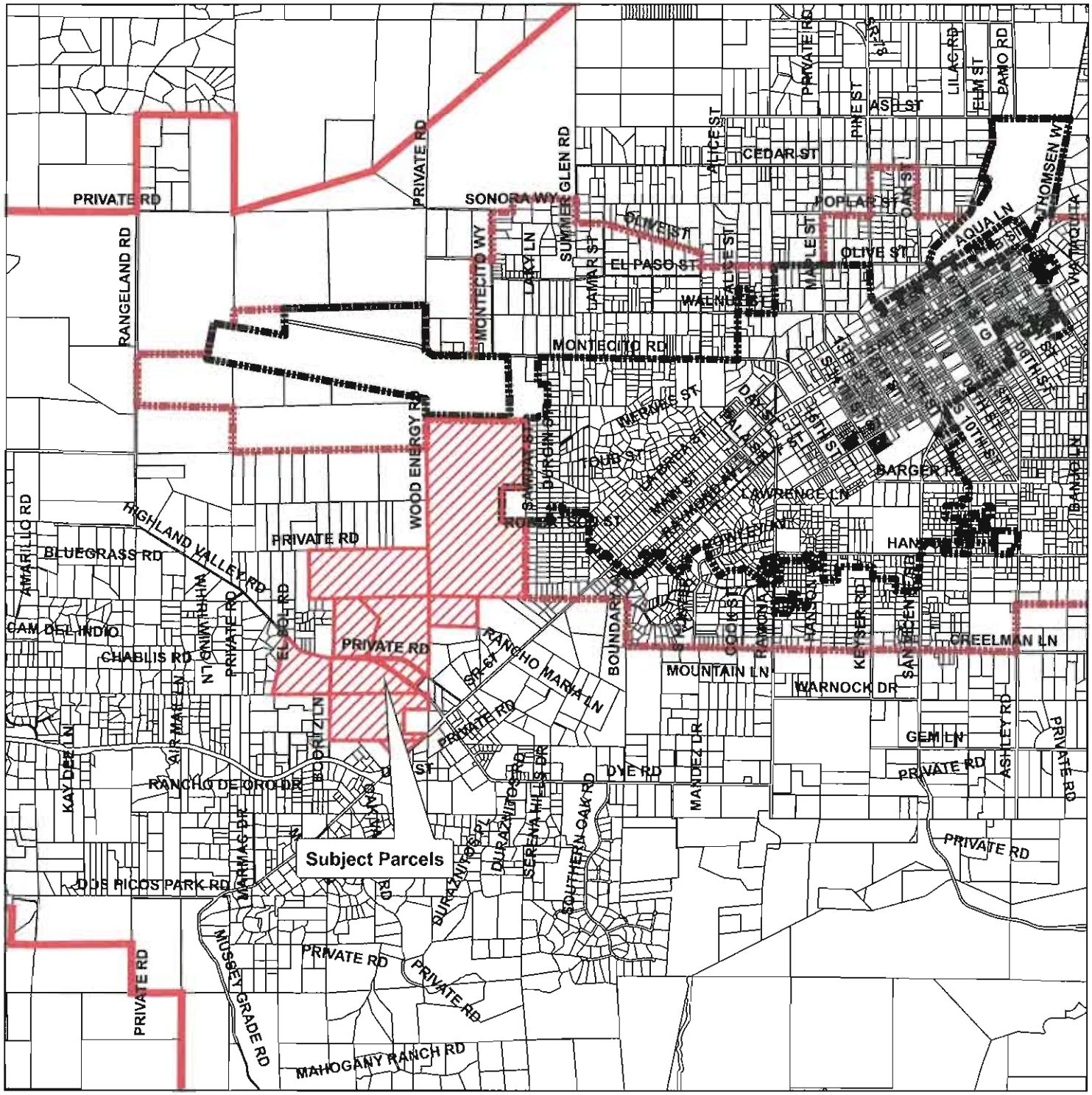
A. A reclaimed water service agreement is signed by the owner/developer and approved by the District that the owner/developer will assure the district that all actual costs of the facilities required by the project, including, but not limited to, administrative costs, design costs, and construction costs will be paid solely by the owner/developer in a timely fashion. The agreement shall state that the facilities required by the project will need to be completed before any connections shall be made.

B. For each reclaimed water service area, an evaluation of whether greenbelt irrigation, commercial office buildings, filling of artificial lakes, or industrial process shall be limited the use of reclaimed water shall be made (LC 7.44.050). The District may mandate construction of reclaimed water distribution systems or other facilities in new developments for current or future reclaimed water use as a condition of any development.

C. Developer shall make a deposit (minimum of $2,000) with the District to cover all costs for any planning and system evaluation required by the District for addressing the facilities needed to serve this project (LC 2.44.020 B). The amount of the deposit may vary depending on the project scope and additional deposits may be needed depending on actual costs. ***The Reclaimed Water System Evaluation shall be completed and a Reclaimed Water Service Agreement executed before the Draft California Environmental Quality Act (CEQA) documents are prepared and before the District will sign a "Project Facility Commitment Form".***

D. Reclaimed water requirements and conditions are based on the current ordinances, resolutions, rules, regulations, specifications, and guidelines of the District. ***Should these ordinances, resolutions, rules, regulations, specification, guidelines, and system conditions change from time to time, the applicant for shall be subject to the requirements in effect at the time of applying for reclaimed water service.***

Vicinity Map
Cumming Ranch
Highland Valley Road & SR-67
Owner: 805 Properties

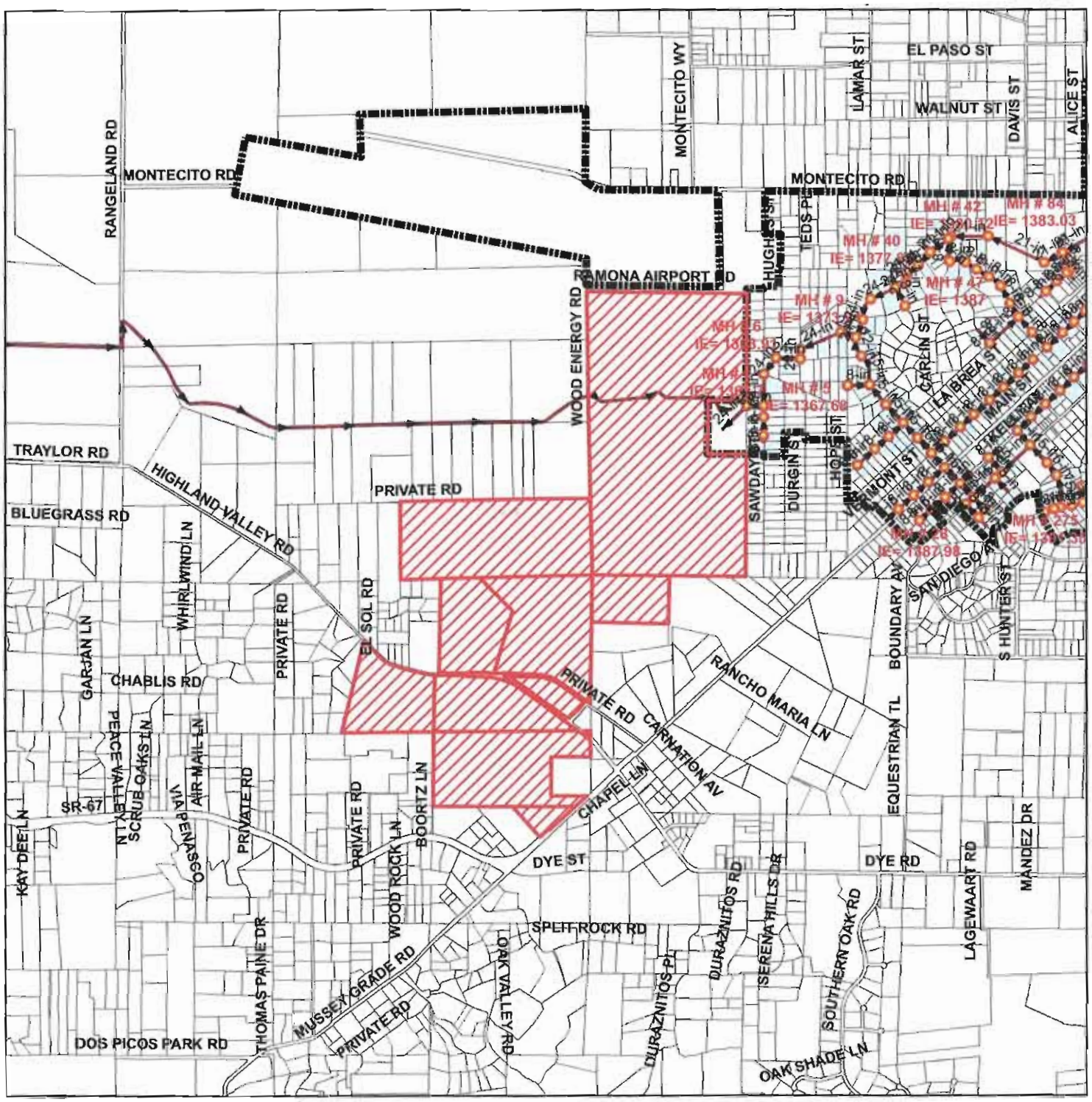


Legend

- RMWD Boundary
- Santa Maria Sewer Service Area
- Active Latent Powers Boundary
- Subject Parcel selection

N
W E
S

Facility Map
Cumming Ranch
Highland Valley Road & SR-67
Owner: 805 Properties



Legend

- RMWD Boundary
- Santa Maria Sewer Service Area
- Sewer System
- Manholes
- Sewer EDUs
- Subject Parcel selection

N
W E
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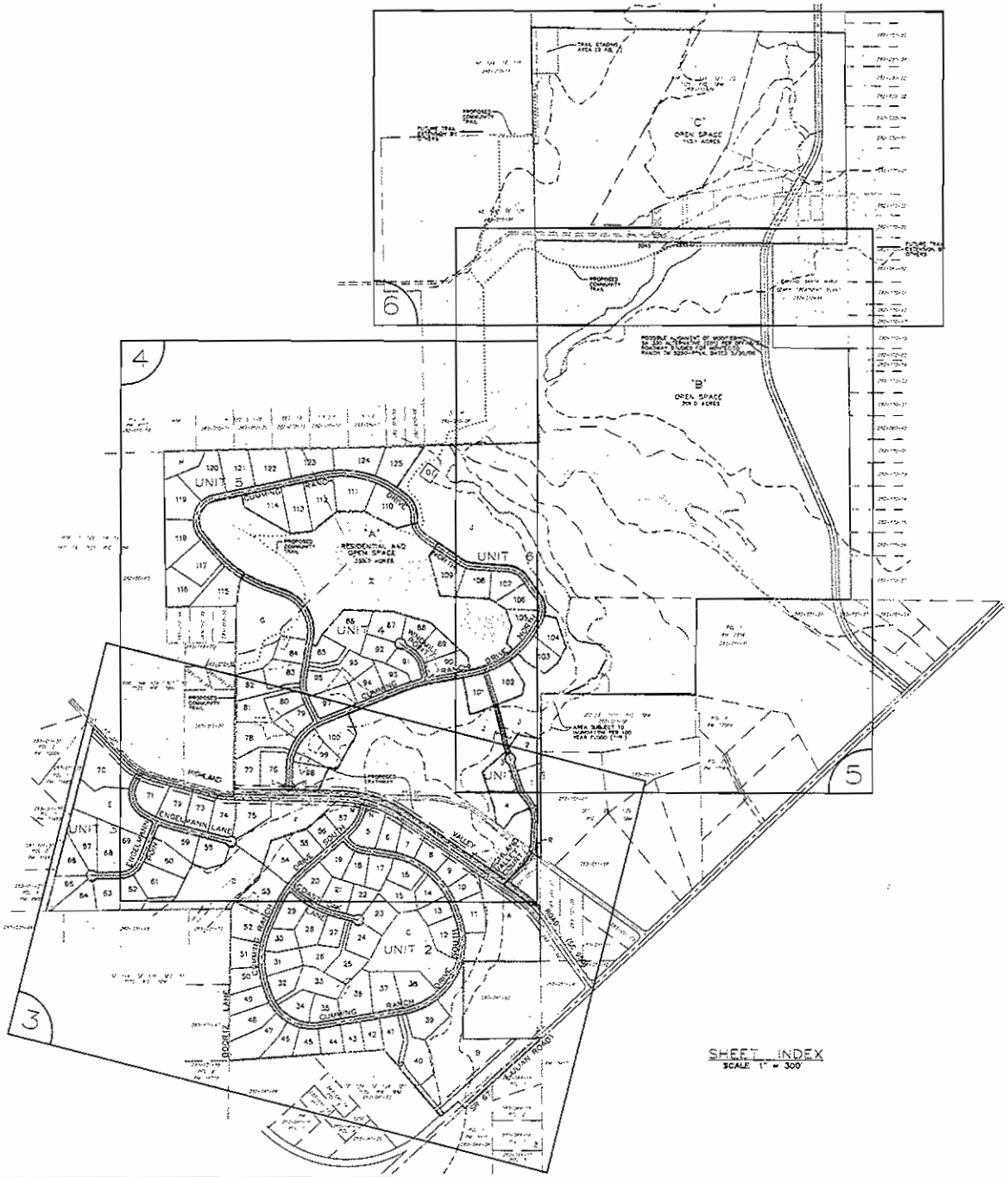
COUNTY OF SAN DIEGO TRACT NO. 5344 RPL 4

CUMMING RANCH TENTATIVE MAP



ATTACHMENT 5
FIRE SERVICE PROJECT FACILITY AVAILABILITY FORM

RAMONA MUNICIPAL WATER DISTRICT
In cooperation with the
CALIFORNIA DEPARTMENT OF FORESTRY
And FIRE PROTECTION

105 Earlham Street
Ramona, California 92065-1599

Telephone:
1-760-788-2244

RAMONA FIRE PREVENTION BUREAU

November 9, 2011

County of San Diego
Department of Planning and Land Use
5201 Ruffin Rd. Ste. "B"
San Diego, California 92123-1666

Attn: Larry Hofreiter Project Planner

Re: **Cumming Ranch TM 5344**

APN: 282-010-30, 43 283-021-1, 02 283-022-01
283-041-03, 09 283-051-01
NW of SR67 and Highland Valley Road
Ramona Ca. 92065

The Ramona Municipal Water District and Fire Services ("District") is faced with the rising cost of operating, water, sewer, and fire suppression services, along with declining water sales. The District is concerned that the Cumming Ranch (TM5344) ("Project"), along with planned development in the Western Ramona Area, would increase the need for fire and emergency medical services and impact the infrastructure and staff necessary to provide such services.

Thus, as a condition to providing fire suppression and emergency services to the Project, Cumming Ranch must establish and demonstrate sufficient funding for its fair share of the additional impact the Project would have on the District. The funding is necessary for the Project to satisfy certain fire suppression requirements, as further explained below, as a condition to the District's commitment to serve the Project.

Project Background

As described in the Fire Protection Plan ("FPP") dated January 4, 2010 prepared by Scott Franklin Consulting for the Project applicant, the Project would consist of 682.6 acres proposed for residential development located immediately west of the Ramona Town Center and about ¼ mile north of the intersection of Highland Valley Road and State Route 67. The Project would include 125 single-family residential lots/parcels ranging from 1.0 to 3.1 acres. Development would be located on approximately 215.4 acres, including all residential lots and internal streets. Approximately 457.4 acres would be preserved as open space.

The Project site would not be mass graded but would consist of individually graded pads for each lot, size commensurate with building footprint. Homes are expected to range in size from 2,700 sq. ft. to 4,500 sq. ft. All homes, including out buildings, would be sprinklered and built to "Enhanced Fire resistive Construction" requirements.

Current (pre-GPA/SP) Zoning is S88 and the General Plan indicates Estate Development on DPLU-GIS mapping. The Project is located primarily in "High" Fire Hazard Severity Zone North of Highland Valley Road, and a mix of "High" and "Moderate" south of Highland Valley Road. It is located in State Responsibility Area (SRA), as determined by CAL FIRE FRAP mapping.

Applicable Fire Safety Regulations

Applicable fire regulations for the Project include the Ramona Legislative Code, which incorporates expressly and by reference the applicable County Consolidated Fire Codes, the County Fire Codes, and State regulations. The District has reviewed the FPP (fourth FPP submittal dated January 4, 2010, prepared by Scott Franklin Consulting for the applicant) for consistency with the Ramona Legislative Code, the California Code of Regulations, Title 24 part 9 (California Fire Code), the County Fire Code which adopts and modifies the State Fire Code, and California Code of Regulations Title 14 (State Responsibility Area) Fire Safe Regulations as applicable.

Specific Conditions of Fire Service Availability

In accordance with Section 3.1 of the FPP, the nearest Fire Station 82, located to the south of the Project at 3410 Dye Road, is expected to provide structural, wildland, and emergency medical services related to the Project. The Project will increase the potential for additional emergency medical and fire services. Travel distance from Fire Station 82 to the furthest building lot on the Project site (lot 125) is 1.64 miles, and thus response time is less than 3 minutes. The Project meets emergency response objectives indentified in the Public Facilities Element of the San Diego County General Plan. But the District anticipates needing additional staffing for Fire Station 82, for example, in order to adequately serve the Project and its residents. Additional daily staff may include 2.5 Engineer/Paramedics. The estimated cost is approximately $298,000 (per year) including overtime pay.

Threshold for Additional Staffing

In order to properly serve the Project, there must be an incremental process to determine at what point additional staffing must be implemented. Under NFPA 1710 chapter 5, fire suppression services must have a community wide risk management model to properly identify services. The District, as the Fire authority having jurisdiction ("FAHJ") for the Project, must make that determination using the community model or a task analysis survey.

The District will identify the community build out within its boundaries in accordance with its plans and policies in order to determine the necessary infrastructure, equipment, and staffing to be funded through a Community Facilities District ("CFD") or other funding mechanism. For example, the 2010 California Fire Code and 2011 Consolidated Fire Code provide that the FAHJ must condition the Project to have water and hydrant infrastructure prior to construction, or some alternate means of water storage to be used by fire personnel should a fire arise.

Staffing levels on current emergency apparatus and stations may also be increased to help serve the project during the construction phase until adequate or permanent facilities and equipment are constructed and staffed. The appropriate trigger for implementing additional staffing should be addressed with the Project in concert with the assessment of necessary water infrastructure for the Project. RMWD Engineering Department has completed The water system evaluation.

Funding Mechanism

Policy S-6.3 of the Safety Element of the County of San Diego General Plan requires development to contribute its fair share towards funding the provision of appropriate fire and emergency medical services as determined necessary to adequately serve the Project. Consistent with this goal, as a condition to receiving fire suppression and emergency services from the District, prior to recording the Final Map and issuance of the first Building Permit in reliance upon P08-032 and P71-396-01, the Project must join an existing CFD or otherwise pay adequate developer fees to fund its fair share of the necessary conditions of fire service availability described above. Such funding is necessary to assist the District in planning and providing additional fire and emergency services to the Project site.

For questions or concerns regarding this letter of conditions for fire service availability for the Project please do not hesitate to contact the District.

Sincerely,

Saul Villagomez, Fire Marshal
Battalion Chief CAL FIRE/Ramona MWD Fire Prevention Services

COUNTY OF SAN DIEGO
DEPARTMENT OF PLANNING AND LAND USE: Zoning
PROJECT FACILITY AVAILABILITY FORM, Fire

F

Please type or use pen

805 Properties (619) 807-2483
Owner's Name Phone

7338 Turnford Drive
Owner's Mailing Address Street

San Diego, CA 92119
City State Zip

ORG_____
ACCT_____
ACT_____
TASK_____
DATE_____ AMT $ 75.00

DISTRICT CASHIER'S USE ONLY

SECTION 1. PROJECT DESCRIPTION — TO BE COMPLETED BY APPLICANT

A.
- [x] Major Subdivision (TM)
- [ ] Minor Subdivision (TPM)
- [ ] Boundary Adjustment
- [x] Rezone (Reclassification) from S-88 to S-88 zone.
- [ ] Major Use Permit (MUP), purpose:
- [ ] Time Extension...Case No.
- [ ] Expired Map...Case No.
- [x] Other Site Plan
- [x] Specific Plan or Specific Plan Amendment
- [ ] Certificate of Compliance:

B.
- [x] Residential ..... Total number of dwelling units 125
- [ ] Commercial ..... Gross floor area
- [ ] Industrial ..... Gross floor area
- [ ] Other ..... Gross floor area

C. Total Project acreage 682 Total lots 135 Smallest proposed lot 1.0

Assessor's Parcel Number(s)
(Add extra if necessary)

282-010-30,43	283-051-01
283-021-01,02	
283-022-01	
283-041-03,09	

Thomas Bros. Page 1172/115 Grid B3/B7

NW of SR67 and Highland Valley Road
Project address Street

Ramona 92065
Community Planning Area/Subregion Zip

OWNER/APPLICANT AGREES TO COMPLETE ALL CONDITIONS REQUIRED BY THE DISTRICT.

Applicant's Signature: [signature] Date: 10/17/11

Address: 7338 Turnford Drive, San Diego, CA 92119 Phone: (619) 807-2483

(On completion of above, present to the district that provides fire protection to complete Section 2 and 3 below.)

SECTION 2: FACILITY AVAILABILITY — TO BE COMPLETED BY DISTRICT

District name RAMONA MWD / RAMONA Fire Department

Indicate the location and distance of the primary fire station that will serve the proposed project: Ramona Fire Station 82
3410 Dye Road, Ramona CA 92065. Travel Distance 1.6 to furthest lot

A.
- [x] Project is in the District and eligible for service.
- [ ] Project is not in the District but is within its Sphere of Influence boundary, owner must apply for annexation.
- [ ] Project is not in the District and not within its Sphere of Influence boundary.
- [ ] Project is not located entirely within the District and a potential boundary issue exists with the _____ District.

B.
- [x] Based on the capacity and capability of the District's existing and planned facilities, fire protection facilities ~~are currently~~ adequate or will be adequate to serve the proposed project. The expected emergency travel time to the proposed project is Less than 5 minutes. Per Condition Letter
- [ ] Fire protection facilities are not expected to be adequate to serve the proposed development within the next five years.

C.
- [x] District conditions are attached. Number of sheets attached: 4 - Letter of Condition to Serve
- [ ] District will submit conditions at a later date.

SECTION 3. FUELBREAK REQUIREMENTS

Note: The fuelbreak requirements prescribed by the fire district for the proposed project do not authorize any clearing prior to project approval by the Department of Planning and Land Use.

- [x] Within the proposed project 100' feet of clearing will be required around all structures.
- [x] The proposed project is located in a hazardous wildland fire area, and additional fuelbreak requirements may apply. Environmental mitigation requirements should be coordinated with the fire district to ensure that these requirements will not pose fire hazards.

Expires 11/4/2013

This Project Facility Availability Form is valid until final discretionary action is taken pursuant to the application for the proposed project or until it is withdrawn, unless a shorter expiration date is otherwise noted.

[signature] Scott E. Williamson Fire Marshal 760-788-2144 11/4/2011
Authorized signature *Print name and title* *Phone* *Date*

On completion of Section 2 and 3 by the District, applicant is to submit this form with application to: Zoning Counter, Department of Planning and Land Use, 5201 Ruffin Road, Suite B, San Diego, CA 92123

FINAL
ENVIRONMENTAL IMPACT REPORT

Cumming Ranch Project
3810 03-005 (SP), 3600 07-002(R), 3100 5344 (TM),
3500 10-007 (STP), 3910 03-09-028 (ER)
SCH: 2004031136

Lead Agency:
County of San Diego
Department of Planning and Development Services
5510 Overland Avenue, Room 110
San Diego, California 92123
Contact: Larry Hofreiter, DPLU Project Manager
(858) 694-8846
Contact: Maggie Loy, Environmental Coordinator
(858) 694-3736

Preparer:
John Bridges
AECOM
1420 Kettner Boulevard, Suite 500
San Diego, California 92101

Project Proponent:
Gene Driscoll
805 Properties
7338 Turnford Drive
San Diego, California 92119

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LIST OF ACRONYMS

Please note: County DPLU changed its title to PDS in October 2012. See entry below.

AB	Assembly Bill
ACOE	U.S. Army Corps of Engineers
ADT	average daily traffic
AF/YR	acre-feet per year
APS	Alternative Planning Strategy
B.P.	before present
BMP	best management practice
BO	Biological Opinion
CAA	Federal Clean Air Act
CalEPA	California Environmental Protection Agency
Caltrans	California Department of Transportation
CARB	California Air Resources Board
CC&Rs	covenants, conditions, and restrictions
CCR	California Code of Regulations
CAL FIRE	California Department of Forestry and Fire Protection
CDFG	California Department of Fish and Game
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFC	chlorofluorocarbon
CFR	Code of Federal Regulations
CH_4	methane
CNEL	Community Noise Equivalent Level
CNPS	California Native Plant Society
CO	carbon monoxide
CO_2	carbon dioxide
CO_2e	CO_2 equivalent
County	County of San Diego
CRHR	California Register of Historical Resources
CSS	coastal sage scrub
CWA	Clean Water Act
dBA	A-weighted decibels
DCSS	Diegan coastal sage scrub

DPLU	County of San Diego Department of Planning and Land Use (changed to PDS – Planning and Development Services, October 2012)
DPR	Department of Parks and Recreation
DPW	Department of Public Works
DWR	Department of Water Resources
EDU	equivalent dwelling unit
EIR	Environmental Impact Report
FAA	Federal Aviation Administration
FESA	Federal Endangered Species Act
FHWA	Federal Highway Administration
FMMP	Farmland Mapping and Monitoring Program
GHG	greenhouse gas
GPA	General Plan Amendment
gpd	gallons per day
GPS	global positioning system
HFC	hydrofluorocarbon
HLP	Habitat Loss Permit
HOA	Homeowner's Association
LAFCO	Local Agency Formation Commission
LBZ	Limited Building Zone
L_{eq}	equivalent noise level
LOS	level of service
MBTA	Migratory Bird Treaty Act
MGD	million gallons per day
MMT	million metric tons
mph	miles per hour
MPO	Metropolitan Planning Organization
MSCP	Multiple Species Conservation Program
NO_2	nitrogen dioxide
NAAQS	National Ambient Air Quality Standards
NCCP	Natural Community Conservation Plan
NCMSCP	North County MSCP
NOP	Notice of Preparation
NO_X	oxides of nitrogen
N_2O	nitrous oxide
NPDES	National Pollutant Discharge Elimination System
NSLU	noise-sensitive land use
O_3	ozone

OHWM	Ordinary High Water Mark
OPR	Office of Planning and Research
OS	Open Space
Pb	lead
PM_{10}	suspended particular matter
$PM_{2.5}$	fine particular matter
ppm	parts per million
PUC	California Public Utilities Commission
PVC	polyvinyl chloride
RAQS	Regional Air Quality Strategy
RCPG	Ramona Community Planning Group
RCRA	Resource Conservation and Recovery Act
RFD	Ramona Fire Department
RMP	Resource Management Plan
RMWD	Ramona Municipal Water District
ROW	right-of-way
RPO	Resource Protection Ordinance
RR	Rural Residential
RTIP	Regional Transportation Improvement Plan
RTP	Regional Transportation Plan
RUSD	Ramona Unified School District
RWQCB	Regional Water Quality Control Board
SANDAG	San Diego Association of Governments
SB	Senate Bill
SCS	Sustainable Communities Strategy
SDAB	San Diego Air Basin
SDAPCD	San Diego Air Pollution Control District
SDCWA	San Diego County Water Authority
SF_6	sulfur hexafluoride
SIP	State Implementation Plan
SMWWTP	Santa Maria Wastewater Treatment Plant
SO_2	sulfur dioxide
SPA	Specific Planning Area
SR 67	State Route 67
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TAC	toxic air contaminant
TIF	Transportation Impact Fee

TM	Tentative Map
UBC	Uniform Building Code
USEPA	U.S. Environmental Protection Agency
USFWS	U.S. Fish and Wildlife Service
USGS	U.S. Geological Survey
UWMP	Urban Water Management Plan
VOC	volatile organic compounds
WDR	Waste Discharge Requirement
$\mu g/m^3$	micrograms per cubic meter

SUMMARY

S.1 Project Synopsis

Location

The Cumming Ranch Specific Planning Area (SPA) is part of the Ramona Community Planning Area located in central San Diego County. The Cumming Ranch project site is located approximately 20 miles northeast of downtown San Diego, 11 miles east of Interstate 15, and 15 miles north of Interstate 8. The project site is located immediately west of the Ramona Town Center and approximately 0.25 mile northwest of the intersection of State Route 67 (SR 67) and Highland Valley Road.

Description

The proposed Cumming Ranch project is specifically designed to accommodate the County of San Diego's Ramona Grasslands Preserve by making available to the preserve certain privately owned lands while retaining a portion of the acreage for residential development.

The project site is 682.6 acres. Of the 682.6 acres, 457.8 acres (approximately 67%) would be either dedicated or designated as open space and made available for inclusion in the Ramona Grasslands Preserve; 215.0 acres would be used for residential development. Approximately 9.8 acres of the property is located in the right-of-way (ROW) for Highland Valley Road and SR 67.

Of the 457.8 acres of open space, 143.7 acres would be dedicated as permanent open space as mitigation for the development, including the easements in Areas B and C. The owner plans, following recordation of the final map, to convey by sale 138.5 acres to the County of San Diego (County) or a conservancy acting on behalf of the Ramona Grasslands Preserve. In addition, the owner plans, with recordation of the final map, to convey approximately 113.1 acres in fee title to the County or a conservancy acting on behalf of the Ramona Grasslands Preserve.

The residential portion of the project would consist of 125 residential lots, ranging in size from 1.0 to 3.1 acres. Average residential lot size would be approximately 1.5 acres. The lots would be designed to be consistent with the rural character of the Ramona community and to transition as seamlessly and naturally as possible with the adjoining grasslands. Relatively large lots, minimum grading techniques, retention of existing natural features, and natural landscaping

practices throughout the project are key design elements that would help to maintain rural character and transition easily with adjacent preserved areas.

Access for the project is via four points on Highland Valley Road. The project would be designed to collect all residential traffic internally to minimize and avoid unnecessary interference with traffic along Highland Valley Road. No individual lots would have direct access to Highland Valley Road. The project would include two additional secondary access/egress points for fire and evacuation use only. Water and sewer service would be provided by the Ramona Municipal Water District (RMWD). Local Agency Formation Commission (LAFCO) approval of an expansion of the RMWD latent sewer power area for the extension of sewer service to the proposed project area would be required. No wells or septic systems would be used. Sewer lines were specifically engineered within low-elevation areas to avoid the need to mass grade the project site for a gravity flow system. The project would install and fund construction of community trails and pathways in the project area, along Highland Valley Road, and in Hardy Ranch (County-owned). ROW for a possible future community trail through Area B will be dedicated to the County.

The land use plan and design of the project, including the owner's willing participation in making certain lands available for the Ramona Grasslands Preserve, were guided by and in response to the County's Department of Planning and Land Use (DPLU) White Paper for the Ramona Grasslands (County of San Diego 2002a). The rural character theme incorporated in the design is intended to meet requirements of the Ramona Community Plan (County of San Diego 2002b).

Setting

The project site is located in Ramona, an unincorporated community of the County of San Diego. According to the 2000 Census, Ramona has a population of approximately 33,404 residents. Ramona is approximately 20 miles northeast of downtown San Diego, which serves as a principal employment center. As growth has occurred throughout the County, Ramona has maintained a rural and country lifestyle.

The project site is located immediately west and contiguous to Ramona Town Center. The project site is divided into three main areas: Areas A, B, and C. Area A, located in the southernmost portion of the site, has rolling topography, with the dominant topographic feature being an east-west-trending ridgeline. Stands of Engelmann and coast oak trees, rock outcroppings, and small unnamed drainages are scattered throughout portions of the area. Highland Valley Road bisects Area A. Area B, the center portion of the property, is located generally between Area A and Santa Maria Creek. The topography in the central area consists

mostly of a wide-open, level-plain area. Area C contains a scattering of vernal pools, some of which are protected by conservation easements. Collectively, these conservation easements are referred to as the Ramona Vernal Pool Preserve.

Currently, portions of Areas A and B are used for dry-land farming, mostly oat-hay, and cattle grazing throughout the year. Area C is fenced and not used for farming or cattle grazing in order to protect the sensitive vernal pools.

The pattern of adjacent land uses is varied. Located to the east is Ramona Town Center. To the north is the Ramona Airport, and to the south and west and along portions of the north boundary are residential homes on lots mostly ranging in size from 1 to 5 acres. Northwest of Areas B and C, the project site adjoins Cagney Ranch and Hardy Ranch, both acquired by the County for inclusion into the Ramona Grasslands Preserve.

S.2 Summary of Significant Effects and Mitigation Measures that Reduce or Avoid the Significant Effects

This section provides a brief summary of the significant issues and whether the impacts can be mitigated. Table S-1, located at the end of this chapter, includes detailed descriptions of each environmental effect of the proposed project found to be significant, the mitigation measures that would reduce or avoid that effect, and the conclusion as to whether the effect would be reduced to below a level of significance by applying the mitigation measures. Table S-1 also references the subchapters of this environmental impact report (EIR) where each topic is analyzed in detail.

Chapter 2 provides analysis of one issue area that would result in significant and unmitigable impacts. As outlined in Subchapter 2.1, cumulative traffic impacts at one segment of SR 67 between Poway Road and Archie Moore Road are considered significant and unmitigable.

The following environmental issues were found to have significant, but mitigable, impacts: biological resources (Subchapter 3.1), cultural resources (Subchapter 3.2), noise (Subchapter 3.3), aesthetic and visual quality (Subchapter 3.4), climate change (Subchapter 3.5), and public services and recreation (Subchapter 3.6). Mitigation measures have been proposed that would reduce these potential environmental impacts to less than significant.

S.3 Areas of Controversy

The California Environmental Quality Act (CEQA) Guidelines state that an EIR must identify areas of controversy known to the lead agency, including issues raised by agencies and the public

(Section 15123[b][2]). The County issued a Notice of Preparation (NOP) for the Cumming Ranch project on March 25, 2004. The following is a summary of potential controversial issues received during the NOP comment period and those that arose during preparation of the Draft EIR:

- Additional project traffic on area roadways
- Conversion of undeveloped farmland to urban development and the resulting change to the rural character of the community
- Potential impacts to onsite biological resources and habitat
- Potential for increases in noise from the proposed lift station on the project site
- Potential for drainage issues and flooding of offsite properties
- Potential connection into the Mount Woodson force main for sewer service
- Emergency access
- Timely water, sewer, and fire service availability to meet project demand
- Potential impacts on the planned, orderly, and efficient patterns of development
- Biological integrity of the Ramona Grasslands Preserve

S.4 Issues to Be Resolved by the Decision-Making Body

The County of San Diego Board of Supervisors (County Board of Supervisors) will be required to make decisions concerning the significant impacts that would result with implementation of the proposed project. First, the County Board of Supervisors must determine if the benefits of the proposed project outweigh the significant unavoidable impacts related to traffic. They would also be required to adopt a Statement of Overriding Considerations explaining why they would be willing to accept each significant impact that cannot be mitigated. This decision must balance the benefits of the proposed project against the unavoidable environmental effects in determining whether to approve the project.

Concerning significant impacts that can be avoided and reduced with mitigation measures, the County Board of Supervisors would be required to adopt findings for each significant impact that show that the project has been changed (including adoption of mitigation measures) to avoid or substantially reduce the magnitude of the impact. The County Board of Supervisors must determine that adopted mitigation measures are feasible and fully enforceable through permit conditions, agreements, or other measures.

S.5 Project Alternatives

This EIR evaluates alternatives that would lessen or avoid significant impacts, identified in Chapters 2.0 and 3.0. Five project alternatives (listed below) were proposed for evaluation. Each

alternative would, in some way, reduce one or more potentially significant impacts through lot re-design, reduced density, or other measure. Additional project alternatives that were analyzed and eliminated during the EIR preparation process are described in Section 5.1.1, Alternatives Considered but Rejected. Five project alternatives (two "no project" alternatives, one reduced-density alternative, one clustered development alternative, and one general plan update alternative) were analyzed.

CEQA requires that a No Project Alternative be considered (CEQA Guidelines 15126.6[e]). This EIR evaluates the No Project Alternative in two ways. The first is the "No Build Alternative," which would include no development of the project site. The second is the "Former Community Plan Alternative." This alternative assumes that the site would be developed as defined in the Cumming Ranch SPA in the former Ramona Community Plan at some future time.

The following five alternatives are compared in this EIR and are listed here in order of superiority (least amount of environmental impacts) using the detailed analysis in Chapter 5.0. Table S-2 at the end of this chapter provides a summary of the alternatives comparison.

- No Build Alternative
- Reduced Project Alternative
- General Plan Update Alternative
- Clustered Development Alternative
- Former Community Plan Alternative

No Build Alternative

The No Build Alternative would most likely not include any development, at least in the near term. Although other development proposals could be pursued on the project site, any development would require a Specific Plan and approval by the County Board of Supervisors. Thus, development of the project site could not immediately occur if the Cumming Ranch proposal is not approved. It is currently unknown if the onsite agriculture would continue, due to the limited economic viability of continued farming operations on the project site. Under this alternative, no grassland acreage on the project site would be permanently preserved as part of the Ramona Grasslands Preserve.

As indicated in Chapter 5.0 of this EIR, the No Project Alternative would result in fewer impacts than the proposed project for many issue areas evaluated, and is considered to be the environmentally superior alternative. However, based on CEQA Guidelines, the EIR must also

identify an environmentally superior alternative among the other alternatives considered (Section 15126.6[e][2]).

The No Build Alternative was rejected in favor of the proposed project because it does not meet the goals and objectives of the project, as outlined in Subchapter 1.2 of this EIR. A full analysis of this alternative is contained in Subchapter 5.2 of Chapter 5.0. No graphical representation of this alternative exists because the project site would not be developed or significantly altered.

Reduced Project Alternative

Similar to the proposed project, development under this alternative would be confined to the area south of Etcheverry Creek. However, the density would be reduced to allow no more than 47 lots. The minimum lot size would be 2 acres and could range up to 4 acres. Due to the large lot size, encroachment into the upland habitats and landforms would result, although actual development would not take place on the steep slope areas. This alternative would not require a sewer connection, as the large lot size would allow for use of a septic system for all lots. The trail system would be the same as the proposed project. Similar to the proposed project, the areas north of Etcheverry Creek would be available for sale or donation for the Ramona Grasslands Preserve.

This alternative has the potential to reduce impacts to traffic, public services, noise, aesthetics, and air quality. Potential issues areas that could result in greater impacts as compared to the proposed project are biology, cultural resources, and water quality. The Reduced Project Alternative was rejected in favor of the proposed project because the large lot size would encroach into unique landforms and isolate upland habitats, and would be detrimental to the biological function of the site. See Subchapter 5.5 for a full analysis and graphical depiction of this alternative.

General Plan Update Alternative (developed prior to adoption of the General Plan)

This alternative is based on the proposed General Plan update map (County of San Diego 2009) that shows the southern portion of the plan area as Semi-Rural Residential (SR-2), the middle portion as Semi-Rural Residential (SR-10), and the northern portion as Rural Lands (RL-40). This alternative would maintain Areas A, B, and C, with the boundary between A and B shifting north to Etcheverry Creek. The project site would be developed with 81 one-acre minimum lots south of Highland Valley Road and 31 five-acre minimum lots to the north. Areas B and C would remain as open space. This alternative would be designed to accommodate a maximum of

112 residential lots, 13 less than the proposed project. The residential area would be increased by 38.6%, and open space would be less than the proposed project.

This alternative has the potential to reduce impacts for traffic, public services, air quality, and hydrology and water quality. Potential issues areas that could result in greater impacts compared to the proposed project are biology, cultural resources, and aesthetics and visual quality. The General Plan Update Alternative was rejected in favor of the proposed project because the large lot sizes would encroach into unique landforms and isolate upland habitats, and would be detrimental to the visual quality of the project and biological function of the site. See Subchapter 5.6 of Chapter 5.0 for a full analysis and graphical depiction of this alternative.

Clustered Development Alternative

This alternative would develop 166 units, and all of the lots would be located south of Highland Valley Road. The minimum lot size would be 0.5 acre. This alternative would result in the preservation of less open space south of Highland Valley Road because of a relatively higher density of lots in this area. The smaller and denser lots would require the area to be mass graded in a manner similar to a conventional subdivision, and potentially require development on the small knolls. The grading required for this alternative would be approximately 330,000 cubic yards more than for the proposed project. This type of project would have the appearance of a tract-home style of development, and would not be consistent with the rural character of the community. This is not considered to be consistent with the surrounding residential development or the rural character of the Ramona community. However, the area to the north of Highland Valley Road would not be developed and would be available as mitigation land and for purchase for open space preservation.

This alternative would generally reduce the level of biological and cultural impacts over the proposed project. Issue areas that may have greater impacts are traffic, public services, noise, aesthetics, geology and soils, air quality, and land use. Issue areas that would result in similar or slightly less impacts than the proposed project are biology, cultural resources, hazards, hydrology and water quality, and agricultural resources. This alternative is not considered to be environmentally superior to the proposed project.

The Clustered Development Alternative was rejected in favor of the proposed project because it would not meet all objectives of the project and it would not be consistent with the community character of Ramona. See Subchapter 5.4 of Chapter 5.0 for a full analysis and graphical depiction of this alternative.

Former Community Plan Alternative (developed prior to adoption of the new Ramona Community Plan, 2011 [County of San Diego 2001])

Under this alternative, development would occur according to the Ramona Community Plan, which previously described the Cumming Ranch SPA as having a density of 0.25 dwelling units per acre, and permitted "166 single-family dwelling units ranging in size from 2 to 4 or more acres," as well as industrial use adjacent to the Ramona Airport. The industrial use was described as "adjacent to the south of the Ramona Airport, and north of the 100-year floodplain," and it assumed the uses would be Limited Impact Industrial Use, which included custom manufacturing and was allowed in the M52 Use Regulations of the County's zoning ordinance. As described below, this alternative does not meet the exact specifications of the Cumming SPA, as the development must be consistent with the County Resource Protection Ordinance (RPO) and other policies.

This alternative would add two more lots than the proposed project in Area A, and would add an industrial development in the northern portion of the project site. The Ramona Community Plan had allowed for development of residential properties on Area B; however, due to County RPO requirements, development in that area is not feasible. Area B would remain as open space, with possible ongoing farming activities. Due to these constraints, this alternative could not accommodate the full 166 residential lots as described in the Ramona Community Plan. This alternative could not proceed without the approval of a Specific Plan and tentative map for the property. For this reason, this alternative is not presumed to be the immediate outcome if the Cumming Ranch project is not approved. However, it is a future development scenario that could be pursued in place of the proposed project.

This alternative would potentially reduce land use impacts over the proposed project. However, no grasslands acreage would be available to the Ramona Grasslands Preserve within Area A because development would be located throughout the entire area with no common open space. Also, the development of industrial uses in the northwestern corner of Area C would limit connectivity to parcels already purchased for the preserve. Issue areas that may have greater significant impacts under this alternative are traffic, public services, noise, aesthetics, biology, cultural resources, hazards, air quality, hydrology and water quality, and geology and soils. This alternative is not considered to be environmentally superior to the proposed project. This alternative was rejected in favor of the proposed project because it would not meet the objectives of the project. See Subchapter 5.3 of Chapter 5.0 for a full analysis and graphical depiction of this alternative.

Table S-1
Impacts and Mitigation Summary

Description of Impact	Mitigation Measure	Significance After Mitigation	Location in EIR
Traffic – Direct Impacts			
IMPACT TR-1a. The project's contribution of more than 200 average daily traffic (ADT) to the poor operating condition of SR 67 between Scripps Poway Parkway and Archie Moore Road would cause a significant impact.	M-TR-1a SR 67 – Scripps Poway Parkway to Archie Moore Road This segment is currently a two-lane roadway with passing lanes at various locations. It currently operates at LOS F according to the County of San Diego's capacity standards for a two-lane highway. This segment will need widening to a four-lane facility for 5.1 miles to bring it to an acceptable level of service. Requiring the proposed project to construct these regional transportation improvements to this regional transportation facility would not be proportional to the project's impact to the facility. Furthermore, a substantial portion, 3.3 miles, is in another jurisdiction, the City of Poway, and the County does not have jurisdiction to require the mitigation. Therefore, this mitigation would not be feasible. Even within the County jurisdiction, improvements are not feasible because they would require extensive conversion of existing land uses beyond the purview/ability of a private project, and require regional highway improvements of a magnitude and scope disproportionate to the development project. In addition, widening smaller segments of the roadways would not alleviate the current "bottleneck" situation within these road segments because, without widening the entire length of the segment currently operating at unacceptable levels, a "bottleneck" situation would persist. The resolution of the existing and projected inadequate service capacities along this regional arterial, which is designated a State Highway under Caltrans jurisdiction, must occur on a regional level. It should be noted that widening of Main Street (SR 67) from Highland Valley Road/Dye Road to Mapleview Street in Lakeside (a total of 15.3 miles) from two to four lanes is included in the Regional Transportation Improvement Plan (RTIP) as an engineering study. Because there are no reasonable improvements that this project can implement to increase the segment's capacity to acceptable levels, this segment will remain significant and unmitigated with project implementation.	Significant and unavoidable	Section 2.1.3
IMPACT TR-1b. The project's contribution of more than 200 ADT to the poor operating condition of the segments of SR 67 between Archie Moore Road and Pala Street would cause a significant impact.	M-TR-1b Existing Plus Project Conditions, SR 67 Street Segments, Archie Moore Road to Pala Street The roadway improvements as part of the project shall be implemented prior to issuance of the first occupancy permit on the site to the satisfaction of the County DPW and shall also be implemented to Caltrans satisfaction (the segment can be seen in Figure 2.1-1 and the improvements are illustrated in Figure 1-8 and described in Section 1.1.2) and include: a. Eastbound SR 67 – Widen eastbound SR 67 west of the Highland Valley Road intersection to provide two through-lanes and storage in each lane. Widen east of the Highland Valley Road intersection to provide two through-lanes for 400 feet and transition back to the existing roadway width within a 660-foot transition. b. Westbound SR 67 – Widen westbound SR 67 east of the Highland Valley Road intersection	Less than significant	Section 2.1.3

Description of Impact	Mitigation Measure	Significance After Mitigation	Location in EIR
	to provide two through lanes with storage in each lane with the westbound right-turn lane retained. Widen west of the Highland Valley Road intersection to provide two through-lanes for 400 feet and transition back to the existing roadway width within a 660-foot transition. c. Highland Valley Road – Widen northbound Dye Road (Highland Valley Road) to provide duel left-turn lanes at the intersection. d. Traffic Signal – The traffic signal at the SR 67/Highland Valley Road intersection shall be modified to provide for the improvements described above. The construction of these improvements shall require additional ROW and the developer shall be responsible for funding the ROW acquisitions. In the event the developer is not able to acquire the necessary ROW from willing sellers during the final engineering process, the developer shall work with the County to acquire the ROW in accordance with County Board of Supervisors' Policy J-33.		
IMPACT TR-2a. The project's direct contribution to the SR 67 and Highland Valley Road intersection.	M-TR-2a Existing Plus Project Conditions, SR 67 and Highland Valley Road Intersection The direct impacts to the SR 67 and Highland Valley Road intersection shall be mitigated with the widening of SR 67 in the westbound direction to two lanes to accommodate morning peak traffic. This improvement is included in the overall intersection mitigation measures proposed under Mitigation Measure M-TR-1b for the SR 67 and Highland Valley Road intersection to mitigate roadway segment direct impacts.	Less than significant	Section 2.1.3
IMPACT TR-2b. The project's direct contribution to the SR 67 and Archie Moore Road intersection.	M-TR-2b Existing Plus Project Conditions, SR 67 and Archie Moore Road A signal warrant analysis shall be conducted at this intersection prior to approval of the final map. If signal warrants are met, the developer shall restripe the intersection and install a three-way traffic signal within the existing right of way, to the satisfaction of Caltrans and the County of San Diego. If warrants are met, installation of the traffic signal shall be required to be completed prior to occupancy of the first dwelling unit.	Less than significant	Section 2.1.3
Traffic – Cumulative Impacts			
IMPACT TR-3a. The project's contribution to the poor operating conditions of segments of SR 67 (between Scripps Poway Parkway and Archie Moore Road) in the cumulative scenario is considered significant.	M-TR-3a Cumulative Conditions, SR 67 – Scripps Poway Parkway to Archie Moore Road Payment of TIF fees would partially mitigate the segment of SR 67 between Scripps Poway Parkway and Archie Moore Road. A portion of this segment is within the City of Poway. The cumulative impact at this segment is partially mitigated by payment of the County TIF for impacts within the jurisdictional boundaries of the County. To fully mitigate the impact at this segment, the mitigation would require additional travel lanes on the impacted portion of the segment within the jurisdictional limits of the City of Poway (between Poway Road and Cloudy Moon Drive), but this mitigation is not feasible and, therefore, is not proposed to address this impact. Because there are no reasonable improvements that this project can propose to increase the segment's capacity to acceptable levels, this segment would remain significant and unmitigated with project implementation.	Significant and unavoidable	Section 2.1.4
IMPACT TR-3b. The proposed project's	M-TR-3b Cumulative Conditions, SR 67 Segments in County Jurisdiction	Less than	Section

Description of Impact	Mitigation Measure	Significance After Mitigation	Location in EIR
contribution to the poor operating condition of segments of SR 67 (from Poway Road to SR 78) in the cumulative scenario is considered a significant impact.	To mitigate the project's contribution to cumulative impacts along the three remaining SR 67 segments (Impact TR-3b) the project applicant shall pay the appropriate TIF fees as determined by the County prior to issuance of the first occupancy permit on the site to the satisfaction of the County DPW.	significant	2.1.4
IMPACT TR-4. Under the cumulative scenario, conditions on Dye Road would degrade to below the County's standard from LOS C to LOS E. The proposed project's contribution to this poor operating condition of Dye Road in the cumulative scenario is considered a significant impact.	M-TR-4 Cumulative Conditions, Dye Road Segments To mitigate the project's contribution to cumulative impacts along Dye Road segments (Impact TR-4), the project applicant shall pay the appropriate TIF fees as determined by the County prior to issuance of the first occupancy permit on the site to the satisfaction of the County DPW.	Less than significant	Section 2.1.4
IMPACT TR-5. The proposed project's contribution to the poor operating conditions in the cumulative scenario at the SR 67/Archie Moore Road is considered a significant impact.	M-TR-5 Cumulative Conditions, SR 67/Archie Moore Road Intersection To mitigate the project's contribution to cumulative impacts at the SR 67/Archie Moore Road intersection (Impact TR-5), the project applicant shall pay the appropriate TIF fees as determined by the County prior to issuance of the first occupancy permit on the site to the satisfaction of the County DPW.	Less than significant	Section 2.1.4
IMPACT TR-6. The proposed project's contribution to the poor operating conditions in the cumulative scenario at the SR 67/Mussey Grade Road is considered a significant impact.	M-TR-6 Cumulative Conditions, SR 67/Scripps Poway Parkway Intersection To fully mitigate the project's contribution to cumulative impacts at the SR 67/Scripps Poway Parkway intersection (Impact TR-6), the project applicant shall pay the appropriate TIF fees as determined by the County prior to issuance of the first occupancy permit on the site to the satisfaction of the County DPW.	Less than significant	Section 2.1.4
IMPACT TR-7. The proposed project's contribution to the poor operating conditions in the cumulative scenario at the SR 67/Highland Valley Road is considered a significant impact.	M-TR-7 Cumulative Conditions, SR 67/Highland Valley Road Intersection To mitigate the project's contribution to cumulative impacts at the SR 67/Highland Valley Road intersection (Impact TR-7), the project applicant shall construct the intersection improvements outlined in Mitigation Measure M-TR-1b prior to issuance of the first occupancy permit on the site to the satisfaction of the County DPW and Caltrans.	Less than significant	Section 2.1.4
IMPACT TR-8. The proposed project's contribution to the poor operating conditions in the cumulative scenario at the SR 67/Montecito Road is considered a significant impact.	M-TR-8 Cumulative Conditions, SR 67/Montecito Road Intersection To mitigate the project's contribution to cumulative impacts at the SR 67/Montecito Road intersection (Impact TR-8), the project applicant shall pay the appropriate TIF fees as determined by the County prior to issuance of the first occupancy permit on the site to the satisfaction of the County DPW.	Less than significant	Section 2.1.4
IMPACT TR-9. The proposed project's contribution to the poor operating conditions in the cumulative scenario at the SR 67/SR 78 is considered a	M-TR-9 Cumulative Conditions, SR 67/SR 78 Intersection To mitigate the project's contribution to cumulative impacts at the SR 67/SR 78 intersection (Impact TR-9), the project applicant shall pay the appropriate TIF fees as determined by the County prior to	Less than significant	Section 2.1.4

Description of Impact	Mitigation Measure	Significance After Mitigation	Location in EIR
significant impact.	issuance of the first occupancy permit on the site to the satisfaction of the County DPW.		
Biological Resources – Direct Impacts			
IMPACT BI-1 through BI-11. Impacts to vegetation communities.	M-BI-1 through M-BI-11: a. The primary mitigation acreage for the project would be located within Area A open space, with additional mitigation acreage located within Areas B and C. Open space lots A, B, C, D, E, F, and H in Area A were not included as mitigation acreage, as they are considered isolated and are impact neutral areas. Mitigation acreage shall be provided through the permanent dedication of open space land and the provision of an open space easement over this land according to the ratios provided in Table 3.1-5. The open space lots throughout Area A are shown on Figure 1-5 and open space easements are shown on Figure 1-16, Open Space Map. b. The RMP shall be approved and funded for the open space area and approved prior to the approval of a Final Map and any plan or permit for the project. The RMP provides for the monitoring and management of habitats and species such as oak tree replacement, habitat creation, species surveys and monitoring and other efforts involved in the day-to-day management of the open space area (e.g., budget control and analysis, debris removal, exotic weed removal, general maintenance of any open space signage, etc.). The RMP includes performance standards to measure the success of mitigation (e.g., percent improvements over time, success rates, etc.), and shall include (1) monitoring of trails in the field as necessary to minimize impact from trail installation/use; (2) wet condition installation of trail barriers crossing creeks; (3) trail repair (recommend and monitor installation of preventative bio-engineered erosion control devices, repair erosion damage, remove sediment); and (4) monitoring and management of the open space easements and coordination with the HOA to educate residents about the prohibitions and the resource sensitivity of the area. The monitoring and management of these lands shall be conducted in perpetuity.	Less than significant	Section 3.1.3
IMPACT BI-1. Engelmann oak woodland would be directly impacted by the proposed project. Impacts would occur to 0.20 acre of Engelmann oak woodland. The impact to this sensitive vegetation community would be considered a significant impact.	M-BI-1 Direct Effects to Open Space Engelmann Oak Woodland Impacts to 0.20 acre of open Engelmann oak woodland shall be mitigated through the in-kind preservation of existing Engelmann oak woodland onsite in Area A open space at a 3:1 ratio for a total of 0.60 acre (see Table 3.1-5). All necessary mitigation acreage is available on the project site.	Less than significant	Section 3.1.3
IMPACT BI-2. Direct impacts would occur to 0.06 acre of open coast live oak woodland. The impact to this sensitive vegetation community would be	M-BI-2 Direct Effects to Open Coast Live Oak Woodland Impacts to 0.06 acre of open coast live oak woodland shall be mitigated through the preservation of existing Engelmann oak woodland onsite in Area A open space (including acreage preservation and RMP requirements as detailed in Mitigation Measure M-BI-1) at a 3:1 ratio for a total of 0.18 acre	Less than significant	Section 3.1.3

Description of Impact	Mitigation Measure	Significance After Mitigation	Location in EIR
considered a significant impact.	(see Table 3.1-5). All necessary mitigation acreage is available on the project site.		
IMPACT BI-3. Southern willow scrub, both onsite and offsite, would be directly impacted by the proposed project. Impacts would occur to 0.05 acre of southern willow scrub. The impact to this sensitive vegetation community would be considered significant.	M-BI-3 Direct Effects to Southern Willow Scrub Impacts to 0.05 acre of southern willow scrub shall be mitigated onsite in Area A open space (including acreage preservation and RMP requirements as detailed in Mitigation Measure M-BI-1) at a 3:1 ratio for a total of 0.15 acre (see Table 3.1-5). Of the 3:1 ratio, 1:1 shall include onsite restoration at impact locations where feasible. This shall entail the removal and stockpiling of topsoil during construction and then replacing it over the impact area after construction. The impact area shall be recontoured to preconstruction grade and the impact area shall be seeded with appropriate wetland plants. The remaining 2:1 ratio shall include onsite creation or restoration of wetland habitat or at a 3:1 ratio if the impact area cannot be restored. The Revegetation Plan shall detail the performance measures for creation and restoration (see Mitigation Measure M-BI-12).	Less than significant	Section 3.1.3
IMPACT BI-4. Mulefat scrub, both onsite and offsite, would be directly impacted by the proposed project. Impacts would occur to 0.05 acre of mulefat scrub. The impact to this sensitive vegetation community would be considered a significant impact.	M-BI-4 Direct Effects to Mulefat Scrub Impacts to 0.05 acre of mulefat scrub shall be mitigated onsite in Area A open space (including acreage preservation and RMP requirements as detailed in Mitigation Measure M-BI-1) at a 3:1 ratio for a total of 0.15 acre (see Table 3.1-5). Of the 3:1 ratio, 1:1 shall include onsite restoration at impact locations where feasible. This shall entail the removal and stockpiling of topsoil during construction and then replacing it over the impact area after construction. The impact area shall be recontoured to preconstruction grade and the impact area shall be seeded with appropriate wetland plants. The remaining 2:1 ratio shall include onsite creation or restoration of wetland habitat or at a 3:1 ratio if the impact area cannot be restored. The Revegetation Plan shall detail the performance measures for creation and restoration (see Mitigation Measure M-BI-12).	Less than significant	Section 3.1.3
IMPACT BI-5. Cismontane alkali marsh, both onsite and offsite, would be directly impacted by the proposed project. Impacts would occur to 0.98 acre of cismontane alkali marsh. The impact to this sensitive vegetation community would be considered a significant impact.	M-BI-5 Direct Effects to Cismontane Alkali Marsh Impacts to 1.02 acres of cismontane alkali marsh shall be mitigated onsite in Area A open space (including acreage preservation and RMP requirements as detailed in Mitigation Measure M-BI-1) at a 3:1 ratio for a total of 3.06 acres (see Table 3.1-5). Of the 3:1 ratio, 1:1 shall include onsite restoration at impact locations where feasible. This shall entail the removal and stockpiling of topsoil during construction and then replacing it over the impact area after construction. The impact area shall be re-contoured to preconstruction grade and the impact area shall be seeded with appropriate wetland plants. The remaining 2:1 ratio shall include onsite creation or restoration of wetland habitat or at a 3:1 ratio if the impact area cannot be restored. The Revegetation Plan shall detail the performance measures for creation and restoration (see Mitigation Measure M-BI-12).	Less than significant	Section 3.1.3
IMPACT BI-6. Nonvegetated channels, both on and offsite, would be directly impacted by the proposed project. Impacts would occur to 0.03 acre of nonvegetated channel. The impact to this sensitive vegetation community would be considered a significant	M-BI-6 Direct Effects to Nonvegetated Channel Impacts to 0.03 acre of nonvegetated channel shall be mitigated onsite in Area A open space at a 3:1 ratio where the impact occurs (see Table 3.1-5) for a total of 0.09 acre. Creation and/or restoration mitigation shall occur where practicable onsite within Area A. The Revegetation Plan shall detail the performance measures for creation and restoration (see Mitigation Measure M-BI-12).	Less than significant	Section 3.1.3

Description of Impact	Mitigation Measure	Significance After Mitigation	Location in EIR
impact.			
IMPACT BI-7. Although there would be no adverse findings regarding the loss of coastal sage scrub (CSS) for the Habitat Loss Permit (HLP), the loss of acreage of this sensitive vegetation community would be considered a significant impact.	M-BI-7 Direct Effects to CSS Impacts to 26.34 acres of CSS shall be mitigated through the preservation of existing CSS onsite in Areas A and B open space at a 2:1 ratio for a total of 52.68 acres of CSS (see Table 3.1-5). All necessary mitigation acreage is available on the project site.	Less than significant	Section 3.1.3
IMPACT BI-8. Direct impacts would occur to 19.35 acres of granitic southern mixed chaparral. The impact to this sensitive vegetation community would be considered a significant impact.	M-BI-8 Direct Effects to Granitic Southern Mixed Chaparral Impacts to 19.35 acres of granitic southern mixed chaparral shall be mitigated through the preservation of existing granitic southern mixed chaparral onsite in Area A open space (including acreage preservation and RMP requirements as detailed in Mitigation Measure M-BI-1). Mitigation shall be at a 0.5:1 ratio for a total of 9.68 acres (see Table 3.1-5). All necessary mitigation acreage is available on the project site.	Less than significant	Section 3.1.3
IMPACT BI-9. Direct impacts would occur to 4.05 acres of granitic chamise chaparral. The impact to this sensitive vegetation community would be considered a significant impact.	M-BI-9 Direct Effects to Granitic Chamise Chaparral Impacts to 4.05 acres of granitic chamise chaparral shall be mitigated through the preservation of existing granitic chamise chaparral onsite in Area A open space (including acreage preservation and RMP requirements as detailed in Mitigation Measure M-BI-1). Mitigation shall be at a 0.5:1 ratio for a total of 2.03 acres (see Table 3.1-5). All necessary mitigation acreage is available on the project site.	Less than significant	Section 3.1.3
IMPACT BI-10. Direct impacts would occur to 13.75 acres of nonnative grassland. The impact to this sensitive vegetation community would be considered a significant impact.	M-BI-10 Direct Effects to Nonnative Grassland Impacts to 12.94 acres of nonnative grassland shall be mitigated through the preservation of existing nonnative grassland onsite in Areas A, B, and C open space (including acreage preservation and RMP requirements as detailed in Mitigation Measure M-BI-1). Mitigation shall be at a 1:1 ratio for a total of 12.94 acres (see Table 3.1-5). All necessary mitigation acreage is available on the project site.	Less than significant	Section 3.1.3
IMPACT BI-11. Direct impacts would occur to 164.54 acres of field/pasture. The impact to this sensitive vegetation community would be considered a significant impact.	M-BI-11 Direct Effects to Field/Pasture Impacts to 164.95 acres of field/pasture shall be mitigated through the preservation of existing nonnative grassland onsite in Areas A, B, and C open space (including acreage preservation and RMP requirements as detailed in Mitigation Measure M-BI-1). Mitigation shall be at a 0.5:1 ratio for a total of 82.68 acres (see Table 3.1-5 and Table 3.1-9). Impacts in Area B from the sewerline shall be at a 1:1 ratio. All necessary mitigation acreage is available on the project site.	Less than significant	Section 3.1.3
IMPACT BI-12. Though wetland buffers are included throughout the project, the loss of jurisdictional federal, state, and County RPO wetlands would be a direct impact of the project. These onsite and offsite impacts include ACOE waters and wetlands, CDFG wetlands, and County RPO wetlands and would be a significant	M-BI-12 Direct Effects to Wetlands and Waters of the U.S. a. On and offsite impacts to 0.13 acre of ACOE waters and wetlands shall be mitigated onsite in open space easements at a 3:1 ratio. Proposed mitigation for wetlands shall consist of a 3:1 ratio where 1:1 shall include onsite restoration at impact locations and 2:1 shall include onsite creation or restoration of habitat. Creation and/or restoration mitigation shall occur as detailed in a Revegetation Plan for 3.48 acres of riparian habitat/vegetation on the project site. The Conceptual Revegetation Plan is included in Appendix D.	Less than significant	Section 3.1.3

Description of Impact	Mitigation Measure	Significance After Mitigation	Location in EIR
impact.	On and offsite impacts to 1.18 acres of CDFG wetlands and 1.18 acres of County RPO waters and wetlands shall be mitigated onsite in Area A open space at a 3:1 ratio. Proposed mitigation for wetlands shall consist of a 3:1 ratio where 1:1 shall include onsite restoration at impact locations and 2:1 shall include onsite creation or restoration of habitat. Creation and/or restoration mitigation shall occur as detailed in the Revegetation Plan for 3.48 acres of riparian habitat/vegetation on the project site. Appropriate RPO wetland buffers shall be incorporated and shall be a minimum of 50 feet from the edge of the wetlands in accordance with the 2007 RPO. The plan shall also include establishment of 22 Engelmann and 8 coast live oak trees and the southern tarplant seed harvest and redistribution over 3.7 acres (Mitigation Measures M-BI-13 and 14). b. The Revegetation Plan will require approval by the appropriate agencies prior to issuance of grading permits for the project. A conceptual draft of this plan is provided in Appendix D. The Revegetation Plan details the performance measures for creation and restoration of wetlands and wetland habitats. The Revegetation Plan requires a bond be issued to the County to cover the full cost of the revegetation by the developer (to be released at the end of a successful monitoring period). Creation, restoration, and/or enhancement of wetland habitats shall occur throughout various sections of the unnamed drainages within the planned Area A open space area. In addition to the Revegetation Plan for 3.48 acres of riparian habitat/vegetation on the project site, the RMP developed for the open space area shall be approved and funded prior to the approval of a grading permit for the project (Mitigation Measures M-BI-1b through 11b). c. To address indirect impacts to RPO wetlands associated with maintenance activities, the RMP for this project shall require installation, inspection, and maintenance of appropriate best management practices (BMPs). d. For the future trail in Area B, a resurvey of the alignment prior to approval of the final map is proposed to determine if wetland impacts can be further minimized. Although the impacts for the trail in Area B have been evaluated and fully mitigated, the following has been applied to the project as a condition of approval: Prior to finalizing the alignment on the final map, a County-approved biologist and the project engineer would survey and may recommend adjusting the trail and sewer alignment (20-feet wide) in Area B to deviate not more than 100 feet south of the approved location on the tentative map. Changes to the alignment must reduce biological impacts by moving the trail away from alkali marsh to agricultural land or by increasing the width of the wetland buffer along Santa Maria Creek. The survey and alignment recommendations shall be done prior to approval of the final map and be reviewed and approved by DPLU (sewer) and DPR (trails). The applicant is only responsible for granting an easement for the trail in Area B because this trail would be constructed in the future by DPR in coordination with the Ramona Grasslands Preserve		

Description of Impact	Mitigation Measure	Significance After Mitigation	Location in EIR
	Public Access Plan. The applicant is responsible for construction of trails in Area A and Hardy Ranch. During construction of the trails, the Resource Manager under the RMP may make minor adjustments within the 20-foot wide alignment to further minimize impacts from trail use. e. Prior to approval of a grading plan, evidence of applicable permits (or verification that permits are not required) shall be provided to the County. f. During wet conditions, the Resource Manager will evaluate creek crossings and may restrict use of their use with barriers when water flow is an issue for user safety or trail stability or there is a potential for trail damage. The Resource Manager will recommend and oversee installation of preventive bioengineered erosion control devices (such as vegetated swales and permeable pavers), repair erosion damage, and remove sediment from trail crossings as necessary.		
IMPACT BI-13. Impacts to 11 individual Engelmann oak and 4 individual coast live oak trees are considered a significant impact of the proposed project.	M-BI-13 Direct Effects to Individual Oaks Direct impacts to Engelmann oaks and coast live oaks shall be mitigated at a 2:1 replacement ratio. The replacement of 22 Engelmann oak and 8 coast live oak trees shall occur within Area A open space lots. A Revegetation Plan with monitoring and success criteria has been prepared and shall be submitted for resource agency approval. The success of these trees shall be monitored for no less than 3 years in accordance with all Revegetation Plan requirements (Mitigation Measure M-BI-12a).	Less than significant	Section 3.1.3
IMPACT BI-14. The direct impact to a total of 3.70 acres containing southern tarplant is considered a significant impact of the proposed project.	M-BI-14 Direct Effects to Southern Tarplant a. Impacts to 3.7 acres of southern tarplant shall be mitigated with preservation and management of approximately 21 acres of the onsite population within Areas A and B open space. b. In addition, the Revegetation Plan shall be implemented to provide for an expansion of the population on 3.7 acres of suitable habitat in the managed open space. The Revegetation Plan shall include provisions for seed to be harvested from impact areas and distributed on approximately 3.7 acres onsite adjacent to areas known to support the species. The Revegetation Plan shall also include measures for the southern tarplant that will be directly affected by sewer line installation (0.2 acre), to be implemented to retain the topsoil and return it to the same location to allow for regrowth of this species.	Less than significant	Section 3.1.3
IMPACT BI-15. Potential direct impacts to sensitive herpetofaunal, mammalian, and avian species are considered significant impacts.	M-BI-15 Direct Effects to Sensitive Animals a. Direct impacts to sensitive herpetofaunal species habitat shall be mitigated with preservation of habitat onsite within Area A and Area B open space lots for western spadefoot toad; arroyo toad; San Diego horned lizard; granite spiny lizard; granite night lizard; coastal California whiptail; and orange-throated whiptail as required under Mitigation Measures M-BI-1 through M-BI-12. To minimize potential impacts specific to arroyo toad, the following measure shall be	Less than significant	Section 3.1.3

Description of Impact	Mitigation Measure	Significance After Mitigation	Location in EIR
	implemented: Prior to any grading, an arroyo toad biologist shall examine the impact areas to determine if any portions of the site have suitable habitat for occupation by arroyo toad. Upon agreement with USFWS, a protocol survey may or may not be required. If surveys determine that there are no arroyo toads present, no further action would be necessary. If it is determined that arroyo toads are present, then a FESA take permit shall be obtained. Permit conditions would include monitoring and species avoidance measures during construction, mitigation credits over suitable habitat in Area B, open space habitat enhancements, and/or endowment for conservation at a 2:1 occupied habitat ratio, as a condition of the FESA take permit. b. Direct impacts to sensitive mammalian species habitat shall be mitigated onsite within Area A open space lots for mountain lion; American badger; San Diego desert woodrat; San Diego black-tailed jackrabbit; and southern mule deer, as required under Mitigation Measures M-BI-1 through M-BI-12. Prior to any grading, a qualified biologist shall examine the impact areas to determine if any portions of the site have suitable habitat for occupation by Stephens' kangaroo rat. Upon agreement with USFWS, a protocol survey may or may not be required. If surveys determine that there are no Stephens' kangaroo rat present, no further action shall be necessary. If it is determined that Stephens' kangaroo rat are present, then a FESA take permit shall be obtained. Permit conditions would include monitoring and species avoidance measures during construction, such as breeding season restrictions and construction fencing, and dedication of mitigation credits over suitable habitat in Area B, open space habitat enhancements, and/or endowment for conservation, at a 2:1 occupied habitat ratio, as a condition of the FESA take permit. c. Direct impacts to sensitive avian species habitat shall be mitigated onsite within Area A open space lots for Canada goose; turkey vulture; white-tailed kite; northern harrier; golden eagle; Cooper's hawk; red-shouldered hawk; ferruginous hawk; loggerhead shrike; great horned owl; burrowing owl; zone-tailed hawk; red-tail hawk; rough-legged hawk; American kestrel; and barn owl, as required under Mitigation Measures M-BI-1 through M-BI-12. d. To avoid potential construction impacts specific to burrowing owls, tree nesting raptors, California gnatcatchers, and migratory songbirds for the final map shall require: (1) During the breeding season, February 1 through August 31, no brushing, clearing, and/or grading shall be allowed. The Director of DPLU may waive this condition, provided there are no active owl burrows within 800 feet of the brushing, clearing, or grading, as determined by take avoidance (preconstruction) surveys conducted from 14 days to within 24 hours before the initial brushing, clearing, and grading, and ongoing weekly burrowing owl monitoring surveys (according to County or CDFG protocols). After young owls have		

Description of Impact	Mitigation Measure	Significance After Mitigation	Location in EIR
	fledged, or from September 1 through January 31, protocol preconstruction surveys and weekly monitoring throughout grading operations shall be conducted to determine if owls are present in the burrows. If present, a qualified biologist shall implement passive relocation measures in accordance with CDFG Staff Report (CDFG 2012) and wildlife agency concurrence. If no owls are present, grading activities may continue, with weekly burrowing owl monitoring surveys to ensure that no new burrows are occupied. (2) All brushing, clearing, and/or grading shall be restricted such that no grading or clearing will be allowed within 500 feet of tree-nesting raptors in the project area. The developer shall have raptor nest surveys conducted prior to tree cutting or grading near mature trees to ensure that active nests are not present. A qualified biologist shall conduct the surveys between January 15 and August 31, and prepare a survey report. If no raptor nests are discovered in the trees to be removed, no further mitigation shall be required. If any active raptor nests are discovered, the biologist shall mark all occupied trees and delineate a 500-foot buffer area around each occupied tree. No construction activity shall occur within the 500-foot buffer until the young have fledged, as determined by a qualified biologist. (3) All brushing, clearing, and/or grading shall be restricted such that no grading or clearing shall be allowed within 300 feet of occupied coastal sage scrub during the avian breeding season (January 15 through August 31). This measure may be waived if pre-grading surveys show that no gnatcatchers are present in or within 300 feet of the area to be brushed, cleared, or graded. (4) All brushing, clearing, and/or grading shall be restricted such that no grading or clearing shall be allowed to "take" any active migratory bird nest during the breeding season (January 15 through August 31). This measure may be waived if pre-grading surveys show that there are no active migratory bird nests in the area to be brushed, cleared, or graded. If construction is halted for a period of fourteen days or more during the avian nesting season, a biological survey of the habitat within 500 feet of proposed construction sites shall be required prior to restarting construction. The above measures shall be noted on all grading and improvement plans.		
Biological Resources – Indirect Impacts			
IMPACT BI-16. Potential sources for indirect impacts during project construction to the vegetation communities and sensitive plant or animal species known to occur adjacent to the project construction area could include trampling of vegetation outside of the limits of grading by workers and	M-BI-16 Indirect Effects of Project Construction The following resource protection measures shall be implemented by the developer to ensure that indirect impacts to sensitive vegetation communities and sensitive plants do not occur: a. A County approved biologist shall perform monitoring duties before, during, and after construction to ensure against damage to biological resources that are intended to be protected and preserved. The monitor shall be on site during all grading and clearing activities that are in or adjacent to any biological open space areas or sensitive habitats. If	Less than significant	Section 3.1.3

Description of Impact	Mitigation Measure	Significance After Mitigation	Location in EIR
vehicles during construction, erosion, runoff, dust and siltation into offsite areas, and impacts related to storage and access areas. Indirect effects could result from construction noise to sensitive avian species during their breeding seasons, including coastal California gnatcatcher and raptors. These potential indirect construction impacts to sensitive vegetation communities and animal species would be short term, but are considered significant impacts.	there are disturbances, the monitor must report them immediately to the DPLU Permit Compliance Coordinator. Additionally, the biologist shall monitor fencing and erosion control measures, monitor equipment maintenance, staging, and fuel dispensing areas, stop or divert work when deficiencies require mediation, and attend construction meetings. When all grading activities have been completed, the biologist shall prepare and submit a final letter report. b. Prior to commencement of construction, the limits of each phase of project construction shall be clearly delineated with temporary fencing by a survey crew. Onsite, the temporary fencing shall be required when grading is proposed within 100 feet of open space. Offsite, temporary fencing shall be installed to indicate the allowable limits of grading, clearing, and staging areas. The limits shall be checked by the biological monitor before initiation of clearing or construction. The project biologist shall submit a letter to the County indicating that the limits of construction have been checked and work can commence. c. Activities, including staging areas, equipment access, and disposal or temporary placement of excess fill, shall be prohibited within drainages, sensitive habitats, or sensitive plant populations outside of the identified construction area. d. Erosion and siltation into offsite areas during construction shall be minimized through the implementation of an erosion control plan. The contractor shall prepare an erosion control plan for approval by the County. The contract supervisor shall be responsible for ensuring that the erosion control plan is developed and implemented. e. Construction access shall utilize existing developed areas or be within the identified construction area. Contractors shall clearly mark all access routes (i.e., flagged and/or staked) prior to the onset of construction. f. To avoid sensitive habitats, construction staging areas, equipment refueling areas, and other areas for equipment and materials storage shall be located within the identified construction area. To avoid inadvertent impacts to sensitive biological resources that may be present, storage and access areas shall be displayed on the approved project plans and specifications. g. Biological monitoring shall be required where impacts occur in proximity to proposed open space and other sensitive habitats and resources as determined by the project biologist. h. Biological monitoring shall be required along the alignment of the on and offsite infrastructure construction. i. For the future trail in Area B, a resurvey of the alignment prior to approval of the final map is proposed to determine if wetland impacts can be further minimized. Although the impacts for the trail in Area B have been evaluated and fully mitigated, the following has been applied to the project as a condition of approval: Prior to finalizing the alignment on		

Description of Impact	Mitigation Measure	Significance After Mitigation	Location in EIR
	the final map, a County-approved biologist and the project engineer would survey and may recommend adjusting the trail and sewer alignment (20-feet wide) in Area B to deviate not more than 100 feet south of the approved location on the tentative map. Changes to the alignment must reduce biological impacts by moving the trail away from alkali marsh to agricultural land or by increasing the width of the wetland buffer along Santa Maria Creek. The survey and alignment recommendations shall be done prior to approval of the final map and be reviewed and approved by DPLU (sewer) and DPR (trails). The applicant is only responsible for granting an easement for the trail in Area B because this trail would be constructed in the future by DPR in coordination with the Ramona Grasslands Preserve Public Access Plan. The applicant is responsible for construction of trails in Area A and Hardy Ranch. During construction of the trails, the Resource Manager under the RMP may make minor adjustments within the 20-foot wide alignment to further minimize impacts from trail use. The above measures shall be noted on all grading and improvement plans.		
IMPACT BI-17. Indirect effects of resident or trail user encroachment into sensitive areas is considered a potentially significant impact.	M-BI-17 Indirect Effects of Project Occupation a. The dedicated LBZ easements on each lot shall prohibit: (1) animal keeping without effective restraints or fencing, (2) lighting, (3) exotic invasive landscaping, (4) focal use areas including arenas, pools, and patios, and (5) all structures, unless written verification is obtained from the County Fire Marshal that the structure will not require fuel modification to extend into biological open space. The LBZ easements shall require large animals to be kept within fences. b. Open space signage, in accordance with County policy, shall be installed prior to grading activities and shall be maintained and replaced as needed under provisions within the RMP. Signs shall be located every 50 feet along all open space edges in conjunction with the residential lot LBZ and where open space is adjacent to internal streets, pathways and trails. The signage shall have the following language or similar on it: **"Sensitive Environmental Resources** **Area Restricted by Easement** Entry without express written permission from the County of San Diego is prohibited. To report a violation or for more information about easement restrictions and exceptions, contact the County of San Diego, Department of Planning and Land Use Ref: (3810-03-005)" Upon completion of the installation of the open space signage, the project engineer shall submit a signed statement to the County indicating that all signs are in place. c. The RMP resource manager shall monitor and manage the open space easements, and work with the HOA to educate residents and trail users about the prohibitions and the resource	Less than significant	Section 3.1.3

Description of Impact	Mitigation Measure	Significance After Mitigation	Location in EIR
	sensitivity of the area.		
Cultural Resources – Direct and Indirect Impacts			
IMPACT CR-1. Because of the cultural sensitivity throughout the project site, the potential to impact unknown cultural resources during ground-disturbing activities is considered a potentially significant impact.	M-CR-1 All Ground-Disturbing Activities a. A cultural resources monitoring program shall be implemented, as summarized here and detailed in the Cultural Resources Report. The monitoring program shall include observation of all grading by one or more Native American monitors and an archaeological monitor or monitors (depending on the scale of grading going on at any one time). A preconstruction meeting to clarify procedures shall be held prior to the start of ground-disturbing activities. b. If cultural resources are identified during ground-disturbing activities, the following procedures shall be implemented: 1. Isolated artifacts and minor (non-significant) deposits shall be documented in the field, allowing grading to proceed. 2. Any potentially significant deposits or artifact concentrations shall be evaluated, and the County archaeologist shall be notified. A Research Design and Data Recovery Plan shall then be developed for any significant deposits and implemented. Grading in the vicinity of the deposits shall cease until the Data Recovery Plan is implemented to the satisfaction of the County Archaeologist. Standard County Procedures shall be followed in the case that human remains are inadvertently discovered. Material collected during the monitoring program shall be cataloged and analyzed and a report shall be prepared. This report shall address any data recovery that might be required during monitoring, as well as isolated artifacts found during the grading. Artifacts shall be curated at a qualified institution.	Less than significant	Section 3.2.3
IMPACT CR-2. Though the significant portion of site CA-SDi-17,171 would be avoided and preserved, the proximity of construction activities to the site could result in potentially significant impacts.	M-CR-2 Significant Cultural Resource Site CA-SDi-17,171 a. All ground-disturbing activities shall be monitored as described in Mitigation Measure M-CR-1. b. Prior to the start of construction, temporary fencing shall be placed around the known significant portions of this site and shall remain in place until grading is complete to avoid inadvertent disturbance of the significant portion of the site. c. A permanent fence shall be constructed between the road and the site. This shall be a rustic fence to blend with the nature of the proposed development and match fencing used in other areas of the development. d. Signs shall identify this as a sensitive area that is being preserved, but they shall not mention cultural resources or archaeological site.	Less than significant	Section 3.2.3

Description of Impact	Mitigation Measure	Significance After Mitigation	Location in EIR
	e. Site CA-SDi-17,171 shall be placed in an open space easement granted to the County of San Diego. f. The open space easement shall be managed in accordance with the RMP required for this project (the Conceptual Resource Management Plan is provided in Appendix C). Measures specific to management of cultural resources include: 1. A qualified resource manager, approved by the director of Planning and Land Use and/or the County of San Diego Department of Parks and Recreation, shall take responsibility for the management of the open space lots. 2. At the time the resource manager assumes responsibility for the management of the lots, or just prior to this event, the condition of the sites in question shall be documented. This shall consist of establishment of permanent photography stations (either marked by permanent markers or by the designation of a recognizable and re-locatable natural feature such as a rock). These shall be identified on a map of the site. A series of panoramic photographs shall be taken from each photography station to record the condition of the site. Any disturbance or other pertinent conditions shall be photographed, as well, and noted on the site map. A copy of this baseline information shall be filed at the South Coastal Information Center. 3. Each year thereafter, a site visit shall be made by a qualified archaeologist and a Native American Monitor. They shall check the condition of the site against the baseline data recorded in step 2. They shall note any problems and differences between the conditions as they exist on the ground and the conditions described in the baseline documentation. Reports of these visits shall be filed at the South Coastal Information Center. 4. If damage is noted to the archaeological sites, the archaeologist and Native American Monitor shall develop recommendations for preventing further damage. Such measures might include increased patrols, selected capping of site areas, posting of signs, or the formation of a neighborhood watch to monitor the sites and to report vandals.		
IMPACT CR-3. Though the significant portion of this site would be avoided and preserved, the proximity of the construction activity to site CA-SDi-17,177 could result in potentially significant impacts.	M-CR-3 Significant Cultural Resource Site CA-SDi-17,177 a. All ground-disturbing activities shall be monitored as described in Mitigation Measure M-CR-1. b. Prior to the start of construction, temporary fencing shall be placed around the known significant portions of this site and shall remain in place until grading is complete to avoid inadvertent disturbance of the significant portion of the site. c. A permanent fence and signage shall be constructed between the road and the site, as described in Mitigation Measure M-CR-2. d. Site CA-SDi-17,177 shall be placed in an open space easement granted to the County of	Less than significant	Section 3.2.3

Description of Impact	Mitigation Measure	Significance After Mitigation	Location in EIR
	San Diego. e. The open space easement shall be managed in accordance with the RMP required for this project and shall include the management requirements outlined in Mitigation Measure M-CR-2.		
IMPACT CR-4. Site CA-SDi-17,178 cannot be avoided and will be directly impacted by lot and road construction that could result in potentially significant impacts.	M-CR-4 Significant Cultural Resource Site CA-SDi-17,178 a. The mitigation of impacts to CA-SDi-17,178 shall be through data recovery (refer to Cultural Resource Evaluation). A research design has been prepared for this project and is included in the Cultural Report which outlines data recovery mitigation for the proposed destruction of a portion of the archaeological site CA-SDi-17,178. The research design, subject to approval by the County shall include, but is not limited to the following performance standards: 1. All data recovery shall include a Native American monitor. The presence of a Native American monitor shall be required for the duration of the excavation portion of the project. 2. Phase 1 data recovery shall include mechanical trenching (optional) and a 515% hand-excavated sample of the subsurface artifact concentrations for CA-SDi-17,178. During excavation, attention shall be given to the need for special studies such as pollen analysis, flotation samples, botanical analysis, and protein residue analysis. If so, appropriate samples shall be taken and processed. Attention shall be given to collecting, documenting, and processing material for radiocarbon dating and obsidian source and hydration analysis. Material recovered from these excavations shall be cataloged and analyzed using standard procedures. All artifacts collected in the data recovery or in any other phase of this project shall be curated at a facility acceptable to the County of San Diego. 3. At the completion of Phase 1, a letter report shall be submitted to the Director of the Department of Planning and Land Use. The letter report shall evaluate the issues of site integrity, data redundancy, spatial and temporal patterning, features, and other relevant topics to assess the adequacy of the initial (2.5% is typical) percent sample. Based on this assessment, the letter report shall recommend the need for and scope of a second phase of field investigations, not to exceed a total site hand excavated sample (5% is typical) of the subsurface artifact concentration. 4. Implement Phase 2 of fieldwork, as necessary. 5. Conduct artifact analysis, including lithics analysis, ceramics analysis, faunal analysis, floral analysis, assemblage analysis, and radiocarbon dating, as detailed in Appendix 6 of the archaeological extended study, Cultural Resources Evaluation of Cumming Ranch (Gross 2004, 2010).	Less than significant	Section 3.2.3

Description of Impact	Mitigation Measure	Significance After Mitigation	Location in EIR
	b. Prior to recordation of the Final Map the applicant shall: 1. Complete and submit the Final Technical Report from the principal investigator to the satisfaction of the director of Planning and Land Use. 2. Provide evidence to the satisfaction of the Director of Planning and Land Use that all archaeological materials recovered during both the significance testing and data recovery phases have been curated at a San Diego facility that meets standards per 36 CFR 79, and, therefore, would be professionally curated and made available to other archaeologists/researchers for further study. The collections and associated records shall be transferred, including title, to an appropriate curation facility within San Diego County, to be accompanied by payment of fees necessary for permanent curation. Evidence shall be in the form of a letter from the curation facility identifying that archaeological materials have been received and that all fees have been paid.		
IMPACT CR-5. Though the significant portion of site CA-SDi-17,186 would be avoided and preserved, the proximity of the construction activity to the site could result in potentially significant impacts.	M-CR-5 Significant Cultural Resource Site CA-SDi-17,186 a. All ground-disturbing activities would be monitored as described in Mitigation Measure M-CR-1. b. Prior to the start of construction, temporary fencing shall be placed around the known significant portions of this site and shall remain in place until grading is complete to avoid inadvertent disturbance of the significant portion of the site. c. A permanent fence and signage shall be constructed between the road and the site, as described in Mitigation Measure M-CR-2. d. Site CA-SDi-17,186 shall be placed in an open space easement granted to the County of San Diego. The open space easement shall be managed in accordance with the RMP required for this project, and shall include the management requirements outlined in Mitigation Measure M-CR-2.	Less than significant	Section 3.2.3
Noise – Direct Impacts			
IMPACT N-1. Construction of a project roadway may exceed County noise level standards at one offsite receptor and would be considered a significant impact.	M-N-1 Construction Noise – Offsite Receptors During construction of the internal street system south of Highland Valley Road, a 14-foot-high inversed L-shaped temporary noise barrier 420 feet in length shall be constructed along the project boundary as shown in Figure 3.3-6.	Less than significant	Section 3.3.3
IMPACT N-2. Onsite noise-sensitive receptors would include residences completed and occupied prior to completion of the entire project. Onsite receptors may be exposed to noise levels that would exceed the County's applicable construction noise threshold,	M-N-2 Construction Noise – Onsite Receptors When construction sites are located within 75 feet of an occupied residential property line, temporary noise barriers, with a minimum height of 8 feet, shall be required to block the line-of-sight from the occupied residence to the active construction site.	Less than significant	Section 3.3.3

Description of Impact	Mitigation Measure	Significance After Mitigation	Location in EIR
and would be considered a significant impact.			
IMPACT N-3. At distance less than 125 feet, noise levels from rock breaking activities could exceed the County construction noise ordinance, and would be considered a potentially significant impact.	M-N-3 Rock Breaking and Material Handling When rock breaking activities are located within 125 feet of an occupied residential property line, temporary noise barriers with a minimum height of 8 feet shall be required. The temporary barriers shall be constructed no more than 5 feet from the point of impact and to block the line of sight from the active rock breaking/material handling site to the occupied residence. The proposed barrier shall provide an approximately 18 dBA reduction from impact noise associated with rock breaking, which would reduce potential construction noise levels at future residential property lines to 73 dBA L_{eq}.	Less than significant	Section 3.3.3
IMPACT N-4. Construction noise is anticipated to exceed the applicable 60 dBA L_{eq} threshold for avian noise-sensitive habitat, and would be considered a potentially significant impact.	M-N-4 Noise-Sensitive Avian Habitat The following measures shall be required to reduce the short-duration impact of construction-related noise on sensitive avian habitat: a. Where feasible, the project shall avoid construction within 500 feet of habitat for noise-sensitive species, between January 15 through September 15. b. If the preconstruction biological surveys required under Impact BI-15 determine nests of noise-sensitive avians are present in the habitat, or construction noise would have a significant impact on the species using the habitat, an acoustical study shall be prepared to assess noise sources, determine noise levels in the habitat, and determine mitigation measures capable of reducing noise levels to 60 dBA L_{eq} or less. If noise levels from construction cannot be reduced below 60 dBA L_{eq}, construction shall not be allowed January 15 through September 15.	Less than significant	Section 3.3.3
IMPACT N-5. Portions of Lots 5 through 11, Lots 39 through 41, Lots 55 through 57, Lots 70 through 77, and Lots 98 and 99 would be exposed to noise levels above 55 dBA CNEL and would be considered a significant impact.	M-N-5 Traffic Noise Levels and Land Use Compatibility Due to the potential conflicts with the proposed land uses and predicted future noise levels along Highland Valley Road and SR 67, the following measures shall be required to reduce potential traffic noise impacts to a less-than-significant level and to ensure that the proposed project complies with the County's noise standards. As detailed in the Noise Analysis for the project, conceptual feasibility analysis modeling was completed and found that all lots could allow for exterior residential use below the 60 dBA CNEL threshold. a. Prior to approval of the Final Map, in accordance with the San Diego General Plan Noise Element, the applicant shall dedicate to the County of San Diego "noise restriction easements" on each of Lots 5 through 11, Lots 55 through 57, Lots 70 through 77, and Lots 98 and 99, over the area of the property from the lot line at the edge of Highland Valley Road to a line 300 feet from the centerline of Highland Valley Road. These easements shall be for the protection of NSLUs from traffic noise. The noise-restriction easements shall be shown on the Final Map.	Less than significant	Section 3.3.3

Description of Impact	Mitigation Measure	Significance After Mitigation	Location in EIR
	Prior to approval of the Final Map, in accordance with the San Diego General Plan Noise Element, the applicant shall dedicate to the County of San Diego "noise- restriction easements on each of Lots 39 through 41, from the lot line at the edge of SR 67 to a line 795 feet from the centerline of SR 67. These easements shall be for the protection of NSLUs from traffic noise. The noise-restriction easements shall be shown on the Final Map. These noise-restriction easements shall require that, prior to the issuance of a Building Permit for residences located within the noise-restriction easement, evidence shall be provided to the satisfaction of the planning director that exterior (outdoor) noise levels comply with the applicable NSLU noise level limits and land use compatibility guidelines of the County. The NSLU area does not include the entire lot, but includes an area of reasonable size that adjoins the home to allow exterior use by single-family residents at noise levels of 60 dBA CNEL or below. If noise barriers are required for compliance with the noise easement, barriers could be made of masonry, wood, and transparent materials, such as glass or Lucite. Earthen berms or a combination of berms and walls could also provide noise attenuation. The noise-restriction easement language shall contain a restriction stating that the structure and the exterior living area shall be placed such that a noise barrier will complement the residences architecture and will not incorporate a solid (opaque) wall in excess of six feet. Conceptual modeling was prepared and is provided in the noise study (Appendix F) to show feasibility of noise reduction for each impacted lot. The conceptual noise barrier locations are shown on Figure 3.3-7. b. Noise barriers, as described above, would not reduce noise levels at second story elevations. Where two-story homes would be built in the area of properties where future noise levels, without abatement, are forecast to approach or exceed 60 dBA, the Building Permit applicant shall demonstrate that interior noise levels due to exterior noise sources would not exceed 45 dBA. Compliance shall require the submittal of a report, with the building plans identifying the noise attenuation features included in the project's design to maintain interior noise levels at or below 45 dBA. In these cases, it is anticipated that the typical method of compliance would be to provide the homes with air conditioning or equivalent forced air circulation to allow occupancy with closed windows, which, for most residential construction, would provide sufficient exterior-to-interior noise reduction.		
Impact N-6. Noise generated by the lift station would exceed the daytime noise level limit at the nearest property line due to testing of the emergency generator, and would be expected to exceed the County daytime limits at any	M-N-6 Stationary Noise Sources – Lift Station Prior to the issuance of improvement plans or grading permits for the TM, the project applicant shall demonstrate that the sewer lift station noise will comply with the County Noise Ordinance (Section 36.404). To verify noise compliance, a Minor Use Permit or Site Plan shall be required to verify ongoing compliance. As part of the Minor Use Permit, the applicant shall develop and submit site plans for the lift station and proposed enclosure and a noise study, demonstrating the lift station's compliance	Less than significant	Section 3.3.3

Description of Impact	Mitigation Measure	Significance After Mitigation	Location in EIR
property within 515 feet of the lift station without shielding. This is considered a significant impact.	with the County Noise Ordinance, Section 36.404 regulations of 50 dBA L_{eq} during daytime hours (and 45 dBA during nighttime hours) at the lot line, and provide any necessary abatement measures to achieve this noise level. Abatement measures required to reduce noise levels may require complete enclosure of the equipment, specific orientation of the noise-generating equipment, noise barriers, or berms. Specifications and recommendations from this study shall be incorporated into the final site plans to the satisfaction of the Director of the Department of Planning and Land Use.		
Aesthetic and Visual Quality – Direct Impacts			
IMPACT AE-1. Mitigation for noise impacts may necessitate noise abatement in the form of noise barriers. The presence of solid walls or barriers in a relatively open and natural environment is considered to be a potentially significant visual impact.	M-AE-1 Visual Appearance of Noise Barriers The Noise Restriction Easement shall require that the overall look of the required noise barriers at each of the 22 noise-impacted residences adhere to the following design measures to ensure that the noise barriers complement the natural setting and overall design of the Cumming Ranch project and surrounding community character. Measures include: a. Barriers shall be constructed of natural-looking materials that complement the surrounding rural landscape. Materials such as stone, stone veneer, boulders, and stucco are all acceptable materials. b. The use of plexi-glass or other translucent materials shall be allowed. c. The color palette for the barriers shall be consistent with the adjacent rural landscape and consist of earth-toned hues. d. A minimum of a 5-foot-wide landscape buffer shall be required along the exterior base of barriers. All landscape material in this area shall be native and as defined in the Landscape Concept Plan. e. Earth berms or earth berm/wall combination are other acceptable forms of noise mitigation. Berms shall have a maximum of 1.5:1 slope. If a berm is used, it shall be natural in appearance and reflect the aesthetic of the surrounding rural landscape. Berm plantings shall be consistent with the Landscape Concept Plan. f. Wall portion of the barriers shall not exceed 6 feet. The use of natural materials on the wall facades to complement the open rural setting would reduce the intrusiveness of the walls and unite the walls with the overall design of the proposed project. Landscaping along the exterior base of the walls would partially conceal the walls as well as blend the hard lines of the walls with the open surroundings. The use of plexi-glass or other transparent material would reduce the visibility of the walls, while still maintaining the appropriate noise reduction. These measures shall be imposed upon the project by the Noise Restriction Easement.	Less than significant	Section 3.4.3
Climate Change – Cumulative Impacts			
IMPACT CC-1. Implementation and operation of the proposed project could generate GHG emissions that would	M-CC-1 Reduce Project-Generated GHG Emissions Contributing to Climate Change <u>Construction-Generated Emissions</u> – To be required on the grading and improvement plans:	Less than Significant	Section 3.5

Description of Impact	Mitigation Measure	Significance After Mitigation	Location in EIR
contribute to a cumulative climate change impact. This is considered a potentially significant cumulative impact.	The grading and improvement plans shall specify that the contractor shall: a. Maintain construction equipment in good working order per the manufacturer's specifications. b. Limit idling time for construction equipment and vehicles to five minutes. <u>Operational Emissions</u> – The Site Plan shall require that the project developer implement the following mitigation measures or other equivalent measures consistent with OPR guidance to meet the specified performance criteria deemed feasible by the County to reduce GHG emissions. c. Meet California Green Building Code standards for energy efficiency in all new residential units. Examples of these standards include use of Energy Star equipment, water-conserving plumbing fixtures, use of regional materials, and products with recycled content, etc. d. Generate a minimum of 10% of the project's energy consumption from onsite renewable energy-generation sources (e.g., photovoltaic cells or other onsite energy-generating technology). For example, the estimated roof size of the photovoltaic system required to generate 10% of the project's energy would be approximately 4,405 square feet. e. Reduce outdoor water consumption by a minimum of 50% (e.g., rainwater collection systems). f. Install solar water heaters in all proposed units.		
Public Services and Recreation – Direct Impacts			
IMPACT PS-1. Fire protection would not be available to the project while maintaining adequate service to the surrounding community and would result in a significant impact.	M-PS-1 Fire Protection Service. The Cumming Ranch project shall participate in a Community Facilities District, as required by the Ramona Fire Prevention Bureau. The project developer shall be required to pay all fees and meet all requirements of the Community Facilities District to the satisfaction of RMWD.	Less than significant	Section 3.6.3
IMPACT PS-2. If the Cumming Ranch project were to require service prior to completion of the RMWD water service improvements, and cause demand to exceed service availability, a significant impact would result.	M-PS-2 Water Conveyance, Storage, and Treatment County approval of the Final Map for the Cumming Ranch project or permits that allow for ground disturbance, shall not occur until after RMWD has provided a commitment of water supply to serve the project. The project developer shall be required to pay all service fees as determined by RMWD.	Less than significant	Section 3.6.3
IMPACT PS-3. If the Cumming Ranch project were to require service prior to completion of the RMWD sewer service expansion, and cause demand in excess of available service, a significant impact would result.	M-PS-3 Sewer Service and Treatment County approval of the Final Map for the Cumming Ranch project or permits that allow for ground disturbance shall not occur until after RMWD has provided a commitment of wastewater treatment capacity to serve the project. The project developer shall be required to pay all service fees as determined by RMWD.	Less than significant	Section 3.6.3

Description of Impact	Mitigation Measure	Significance After Mitigation	Location in EIR
Public Services and Recreation – Cumulative Impacts			
IMPACT PS-4. Fire protection would not be available to the project while maintaining adequate service to the surrounding community, and would result in a significant cumulative impact.	M-PS-4 Cumulative Fire Protection Service The Cumming Ranch project shall participate in a Community Facilities District, as required by the Ramona Fire Prevention Bureau. The project developer shall be required to pay all fees and meet all requirements of the Community Facilities District to the satisfaction of RMWD.	Less than significant	Section 3.6.4
IMPACT PS-5. If the Cumming Ranch project were to require service prior to completion of the RMWD water service improvements, and cause demand to exceed service availability, a significant cumulative impact would result.	M-PS-5 Cumulative Water Conveyance, Storage, and Treatment County approval of the Final Map for the Cumming Ranch project or permits that allow for ground disturbance shall not occur until after RMWD has provided a commitment of adequate water supply to serve the project. The project developer shall be required to pay all service fees as determined by RMWD.	Less than significant	Section 3.6.4
IMPACT PS-6. If the Cumming Ranch project were to require service prior to completion of the RMWD sewer service expansion, and cause demand in excess of available service, a significant cumulative impact would result.	M-PS-6 Cumulative Sewer Service and Treatment County approval of the Final Map for the Cumming Ranch project or permits that allow for ground disturbance shall not occur until after RMWD has provided a commitment of adequate wastewater treatment capacity to serve the project. The project developer shall be required to pay all service fees as determined by RMWD.	Less than significant	Section 3.6.4

Table S-2
Comparison of Project Alternatives Impacts to Proposed Project Impacts[1]

Issue Area	No Build Alternative	Former Community Plan Alternative	Clustered Development Alternative	Reduced Project Alternative	General Plan Update Alternative
Transportation	Less	Greater	Greater	Less	Less
Public Services and Recreation	Less	Greater	Greater	Less	Less
Biological Resources	Less	Greater	Less	Greater	Greater
Cultural Resources	Less	Greater	Less	Greater	Greater
Noise	Less	Greater	Greater	Less	Similar
Hazards and Hazardous Materials	Less	Greater	Less	Similar	Similar
Aesthetics and Visual Quality	Less	Greater	Greater	Less	Greater
Air Quality	Less	Greater	Greater	Less	Less
Global Climate Change	Less	Greater	Similar	Similar	Similar
Hydrology and Water Quality	Less	Greater	Greater	Greater	Similar
Soils and Geology	Less	Greater	Greater	Similar	Similar
Agricultural Resources	Less	Similar	Less	Similar	Similar
Land Use and Planning	Less	Greater	Greater	Similar	Similar

[1] Greater = Alternative results in greater impacts than the proposed project
Less = Alternative results in less impacts than the proposed project
Similar = Alternative results in similar impacts as the proposed project

CHAPTER 1.0
PROJECT DESCRIPTION AND ENVIRONMENTAL SETTING

This environmental impact report (EIR) was prepared to provide an assessment of the proposed Cumming Ranch project. This project involves rural residential development of 125 homesites and open space preservation on a 682.6-acre parcel in Ramona, California. Ramona is a rural community in an unincorporated portion of San Diego County. The Cumming Ranch project would make available 457.8 acres of permanent open space toward the formation of the County of San Diego's (County) Ramona Grasslands Preserve. Implementation of the project would require approval of a General Plan Amendment (GPA), a tentative map (TM), a Specific Plan, and associated permits and approvals.

This assessment is designed to inform County decision-makers, responsible agencies, and the public about the environmental consequences of development of the project. The County is the lead agency responsible for compliance with California Environmental Quality Act (CEQA) statutes (California Public Resources Code Section 21000 et seq., as amended) and implementing guidelines (California Code of Regulations, Title 14, Section 15000 et seq., 2004). This EIR was prepared consistent with the County's Environmental Impact Report Format and General Content Requirements (County of San Diego 2004a).

This chapter provides information about the project, including project location; overview of project background and planning approach; a detailed description of the project; project objectives; intended uses of the EIR; description of the environmental setting; a list of past, present, and reasonably foreseeable projects for consideration in the cumulative impact analysis; and information on growth-inducing effects.

1.1 Project Description and Location

This subchapter provides a detailed description of the proposed project, including background information and precise location information. The 682.6-acre Cumming Ranch project is specifically designed to accommodate the County's Ramona Grasslands Preserve by making available certain lands to the preserve (approximately 457.8 acres) while retaining a portion of the acreage for residential development (approximately 215.0 acres). The proposed residential development would consist of 125 rural residential lots.

The project site would be divided into three main areas (Areas A, B, and C) to identify and facilitate the transfer of certain lands for inclusion within the Ramona Grasslands Preserve.

Approximately 9.8 acres of the project site is located within the right-of-way (ROW) for Highland Valley Road and State Route 67 (SR 67). This ROW acreage is separate and not included in Areas A, B, or C. Areas A, B, and C are described below:

- Area A would consist of 358.7 acres, of which 215.0 acres would be designated for residential development and 143.7 acres would be dedicated as open space. The 143.7 acres of open space would be used as the primary location for the project's biological mitigation requirements. The 143.7 acres of open space would be managed pursuant to a County-required Resource Management Plan (RMP), and would be subject to an open space easement granted to the County.
- Area B would consist of 201.0 acres that would be designated as open space. A 62.5-acre portion of Area B would be used for the project's biological mitigation requirements, and would be managed pursuant to a County-required RMP. The 62.5 acres used for mitigation would be subject to an open space easement(s) granted to the County. The owner plans to sell Area B to the County or to a conservancy acting on behalf of the Ramona Grasslands Preserve for inclusion in the Ramona Grasslands Preserve. The terms of such a sale would be based only on the remaining 138.5 acres in Area B. The owner would be authorized, until such time the sale is consummated, to continue farming operations on the 138.5 acres, and to have access to existing farm roads.
- Area C would consist of 113.1 acres that would be designated as open space. A 38.4-acre portion of Area C would be used for the project's biological mitigation requirements, and would be managed pursuant to a County-required RMP. The 38.4 acres used for mitigation would be subject to an open space easement(s) granted to the County. Additionally, contained within Area C are 21 existing open space easements, totaling approximately 22.2 acres. Collectively, these easements are commonly referred to as the Ramona Vernal Pool Preserve. The owner plans to donate Area C in fee title to the County or a conservancy acting on behalf of the Ramona Grasslands Preserve, for inclusion within the Ramona Grasslands Preserve.

Areas B and C provide valuable interconnectivity with other grassland properties recently acquired for inclusion in the Ramona Grasslands Preserve.

Residential development would consist of 125 residential lots, ranging in size from 1.0 to 3.1 acres. Average lot size would be approximately 1.5 acres. The lots would be designed to be consistent with the rural character of the Ramona community, and to transition as seamlessly and as naturally as possible with the adjoining grasslands preserve. Relatively large lots, the use of minimum grading techniques, the retention of existing natural features, and the use of natural

landscaping practices throughout the project are key design elements that aim to maintain rural character and to transition the site into the larger environmental setting.

The project proposes to install and provide construction funding for community trails and pathways in Area A and Hardy Ranch.

1.1.1 Precise Location/Boundary

The Cumming Ranch project site is located in central San Diego County, approximately 20 miles northeast of downtown San Diego, 11.5 miles east of Interstate 15, and 15 miles north of Interstate 8 (Figure 1-1 shows the regional location). The Cumming Ranch project site boundaries are the same as the Cumming Ranch Specific Planning Area (SPA) boundaries, which are shown in the Ramona Community Plan (County of San Diego 2002b). The former Ramona Community Plan assumed there would be 664 acres in the SPA. However, when the site was surveyed, it was found that the correct acreage is 682.6 acres, as shown on the TM and in the Specific Plan.

As shown in Figure 1-2, the project site is contiguous to the western boundary of the Ramona Town Center and approximately 0.25 mile northwest of the intersection of SR 67 and Highland Valley Road. Highland Valley Road bisects the southern portion of the project site. The Ramona Airport is adjacent to the site to the north, and the northern property line is contiguous with Ramona Airport Road. The Santa Maria Wastewater Treatment Plant (SMWWTP), operated by the Ramona Municipal Water District (RMWD), is located on a parcel that is inset along the eastern boundary of the site. Santa Maria Creek runs generally east-west across the site, just north of the SMWWTP, and Etcheverry Creek runs generally east-west across the site south of the SMWWTP. Both creeks converge west of the property boundary.

1.1.2 Project's Component Parts

The 682.6-acre Cumming Ranch project would consist of two main development components: residential development and open space, as shown in the land use plan (Figure 1-3). A planning component addresses discretionary approvals and project implementation and phasing. These project components are discussed in detail below. The residential and open space areas described below were designed to accommodate ongoing conservation planning in the Ramona area, specifically the Ramona Grasslands Preserve. Project design was driven by the owner's willingness to participate in the Ramona Grasslands Preserve in response to the Ramona Grasslands Preserve White Paper, prepared by the County's Department of Planning and Land Use (DPLU) in July 2002. Pertinent background information about nearby conservation planning

and the property itself is provided in Section 1.1.3, and the general boundaries of the Ramona Grasslands Preserve are shown in Figure 1-4.

Residential Component

The following section describes the residential component of the project. The residential component is located throughout what is known as Area A of the project site. Table 1-1 provides a development summary and Table 1-2 details each specific land use type and associated acreage totals.

Residential Lots

As shown on the conceptual site plan (Figure 1-5), the project proposes 125 single-family residential lots within the southern half of the site. The residential portion of the project was positioned to conform to the natural landforms of the property. Each lot within the residential development area was individually designed to closely follow the existing natural contours and terrain of the site. Physical features such as trees, boulders, rock outcroppings, drainages, and natural landscaping would be incorporated into the lot design.

Residential lot development would occur on 188 acres within the southern portion of the site (Area A). The project would have a minimum lot size of 1.0 acre and a maximum lot size of approximately 3.1 acres. The average lot size would be approximately 1.5 acres. This averages to a density of 0.35 dwelling units per acre within the residential development area, and an overall density of 0.18 dwelling units per acre. The TM for the project is shown in Figure 1-6. Based on anticipated average sales of three to four homes per month, the typical time from the start of sales to the completion of all homes would be between 3 and 5 years.

Grading

Throughout the development, lot size and shape would vary to provide an individual fit with the unique features of each lot. Lots would be sized to allow for the individual positioning of the driveway and building pad within the lot. Pads would be designed to blend into the terrain, minimizing terracing of pads and retaining contours that complement natural landforms. Unnecessary grading and disturbance to other portions of the lot would be avoided. Minimal grading techniques would be implemented to create a naturally appearing landscape. The Landscape Concept Plan aims to further blend the transition between the natural terrain and the graded areas. It is estimated that by individually designing each lot and minimizing ground disturbance, overall grading would be reduced by approximately 65% as compared to

conventional mass grading methods. Fugitive-dust-suppression techniques (Table 1-6) would be specified on the project grading plans.

Grading for roads and building pads within the project is estimated to be approximately 170,000 cubic yards of balanced cut and fill. All building pads would be rough graded concurrent with installation of improvements for each phase of the project. Finish grading, if necessary, would occur with construction of individual homes. Due to the gently rolling terrain of the areas proposed to be graded, most cut and fill slopes would be less than 10 feet high, with a maximum height of approximately 29 feet to accommodate the roadway between Lots 109 and 110. The maximum cut and fill slope ratio would be 1.5:1 (1.5 horizontal to 1 vertical), although most slopes would vary from 3:1 to 5:1 to reflect a more natural transition from existing natural contours to graded slopes. Erosion-control requirements would include standard best management practices (BMPs), and the measures specified in the Storm Water Pollution Prevention Plan (SWPPP) and Storm Water Management Plan.

Circulation

Onsite Improvements

The project site would have four entrances located off of Highland Valley Road: two accessing lots on the north side of the road and two serving the lots on the south side of the road. Approximately 3,000 feet of Highland Valley Road traverses through the boundary of the project site and serves as access to all areas of the proposed residential development. As shown in the internal circulation plan (Figure 1-7), one entry point would serve the majority of lots located north of Highland Valley Road (Lots 76 through 125). A second entry point on the northern side of Highland Valley Road would serve Lots 1 through 4. The majority of properties south of Highland Valley Road (Lots 5 through 57) would be served by one entry point on the south side of the road. A second entry road on the south side of Highland Valley Road would serve the remaining lots south of the road (Lots 58 through 75).

Signage would accent the entry points and be designed to be unobtrusive and match the rural character of the project. Lighting of signs would be minimal and would occur only at the main entry points off of Highland Valley Road.

The internal roadway network would consist of 24.3 acres (Figure 1-7). This roadway system would be implemented in conjunction with development of the residential portion of the project. All internal roadways would be constructed as public streets with either 52 or 56 feet of ROW width. All internal streets would be built to County standards. Internal streets would be a

combination of looped roadways, with some streets that end in cul-de-sacs. These cul-de-sacs would have a 38-foot radius to meet fire department access regulations. All internal project roadways would be constructed to rural development standards, with asphalt berms instead of concrete curbs and gutters. Each residential lot would have its own individual 16-foot-wide driveway. A discussion of pathways along internal roadways is provided in the Trails and Pathways section, below.

The project includes two additional secondary access/egress roads for fire and evacuation only. No normal traffic would be allowed on these access roads. These emergency access roads would be gated at each end and designed to allow individuals on either side to use them for emergency evacuation purposes. The gates would not be locked and would operate in either direction by any party perceiving an emergency, without key, code, special knowledge, or outside intervention. Signs prohibiting nonemergency use would be posted. One of the secondary access/egress roads would be located between Lots 101 and 102, and would link the two residential roadways to provide emergency fire and evacuation access into or out of the project area on the north side of Highland Valley Road. The second fire and evacuation access/egress road would be located between Lots 40 and 41 on the south side of Highland Valley Road.

Offsite Improvements

The project includes improvements to surrounding roadways to address future traffic circulation and roadway operations needs. These improvements would occur on the onsite and offsite portions of Highland Valley Road and at the intersection of SR 67 and Highland Valley Road. The proposed improvements are described below and shown in Figure 1-8. Additional information can be found in the traffic study (Appendix A).

Highland Valley Road

Highland Valley Road in the project area would be widened to meet County Mobility Element Standards for a Community Collector Road (2.1E). A portion of Highland Valley Road is located within the project boundary. Approximately 3,000 feet of Highland Valley Road traverses onsite areas through the project boundaries of Area A. Highland Valley Road extends approximately 700 feet from the eastern boundary of the project site to the intersection with SR 67. The existing pavement width is approximately 36 to 40 feet, and the improvements would widen the roadway to 50 feet of paving from curb to curb. This improvement would continue to allow for one travel lane in each direction and provide left-turn lanes at all project access streets off of Highland Valley Road. In addition, the increased width would provide for a designated 5-foot-wide bike lane on each side of the road. The roadway would be paved with asphalt concrete, similar to the

existing rural roadway style. No improved concrete curb and gutter system would be provided, but there would be an asphalt curb. The public pathways that would be adjacent to Highland Valley Road are described below under Trails and Pathways.

Multiple drainage culverts cross under Highland Valley Road within the project boundaries. The eastern culvert is currently a triple 4- by 8-foot box culvert; this drainage facility would be lengthened to accommodate the widening of Highland Valley Road, but would remain the same size. The western 36-inch diameter culvert would be replaced with a new triple 4- by 8-foot box culvert. The central 3- by 1.5-foot culvert would be lengthened, but not increased in size. Existing cattle fencing would be removed, and appropriate wildlife directional fencing would be installed.

Intersection of SR 67 and Highland Valley Road

Improvements at the SR 67 and Highland Valley Road intersection would include widening eastbound SR 67 west of the intersection to provide two through-lanes. East of the intersection, eastbound SR 67 would be widened to provide two through-lanes for 400 feet before transitioning back to the existing roadway width. West of the intersection, westbound SR 67 would be widened and the right-turn lane would be converted to a through-lane and extended east of the intersection. This would result in two through-lanes and a right-turn lane and left-turn lane on westbound SR 67. In addition, northbound Dye Road (south of the intersection) would be widened to provide dual left-turn lanes at the intersection. The existing traffic signal would be modified to provide for the above improvements.

Trails and Pathways

A stated objective of the proposed project is to provide a meaningful and scenic public trail system. The project would install and provide construction funding for community trails and pathways. The proposed trails and pathways would be for nonmotorized use only. Specifics for alignment and design are defined in the Cumming Ranch Trails and Pathways Map (Figure 1-9); distances are provided in Table 1-3. The system is designed to function independently or to interconnect and become a part of a larger system of community and/or regional trail systems in the future. The Cumming Ranch trail and pathway system was planned and designed in close consultation with the Transportation and Trails Subcommittee of the Ramona Community Planning Group (RCPG) and the Ramona Trails Association. The routing and design of the trail and pathway system follow the planning guidelines of the Ramona Community Trails and Pathway Plan (County of San Diego 2004b), which is part of San Diego County Trails Program Community Trails Master Plan (County of San Diego 2005a). On January 12, 2005, the County

of San Diego Board of Supervisors (County Board of Supervisors) took action to adopt the Community Trails Master Plan to implement the goals for a County network of regional and community trails.

Irrevocable trail easements would be recorded on title before the dedication, donation, or sale of any portion of the property with proposed trails. Easements for trails would be 20 feet wide, with the exception of the 0.35-mile-long segment referred to as the Connector Trail, which would be 15 feet wide. All trails and pathways funded and constructed by the project would be designed to accommodate and connect to the proposed trail and pathway system for the Ramona community. However, until the additional linkages are completed, the Cumming Ranch trails and pathways could operate in a stand-alone manner, independent of the regional connections. Trail tread widths would range from 8 to 10 feet; however, for impact assessment and mitigation purposes, a 20-foot-wide impact corridor was used for all onsite and offsite trail alignments.

The above trail and pathway system would be installed during the first phase of construction for the proposed project. Upon completion of installation, the County Department of Parks and Recreation (DPR) would assume management and maintenance responsibilities for the approximately 3 miles of trails. The County Department of Public Works (DPW) would assume management and maintenance responsibilities for the approximately 1 mile of pathways located within the ROW of Highland Valley Road. The pathways along Highland Valley Road would have a tread width of 12 feet and an overall width of 15 feet.

For that portion of the community trail system located in Area A of the Cumming Ranch project, the Cumming Ranch project would be responsible for reimbursement of operation and maintenance costs of a trails manager designated by DPR. Said reimbursement would be funded through the establishment of a Landscape Maintenance District that would annually assess each residential lot within the project. For the Connector Trail segment in Area A, reimbursement under the Landscape Maintenance District would include maintenance for the wood-rail fencing separating the trail from private property. The alignment of the trail system through Area A is approximately 1.89 miles in length and is located within dedicated open space.

With the exception of 0.53 miles, the proposed community trails and pathways system would be located within the Cumming Ranch property. Approximately 0.31 mile is located offsite on the Hardy Ranch property that was recently purchased by the County as part of its assemblage of acreage for inclusion within the Ramona Grasslands Preserve. A portion of the alignment within Hardy Ranch (approximately 50% of the total distance) follows an existing dirt road and would share usage on an existing granted 30-foot-wide sewer/water easement owned by the project applicant. As specified in Figure 1-9, the trail alignment would use the existing dirt road and

culverts to cross Etcheverry Creek. The balance of the offsite trail improvements is for the pathway along Highland Valley Road.

It is not known if future trails would be installed in Open Space Areas B and C as part of the Public Access Plan for the Ramona Grasslands Preserve. For conformance with the Community Trails Master Plan, a 20-foot wide ROW for the trail alignment through Area B over 0.38 miles to the western property line would be dedicated to the County.

Pathways would be provided along one side of all internal streets. The pathways would not be paved but would be covered with decomposed granite or a similar material to maintain a rural and informal setting. All pathways would be approximately 6 feet wide. These internal project pathways are anticipated to be used mainly by residents living in the development. The internal pathways would not be obstructed by any landscaping, fencing, gates, aboveground utilities, or irrigation systems. These pathways would be instead of a typical sidewalk, and would be installed and funded by the project but maintained by the County DPW. These pathways would total 3.65 miles and would be considered part of the overall community trail system. The distance of these internal pathways was not included in the total distance of community trails and pathways, as outlined at the start of this section.

Trail alignments are all located outside of vernal pool watersheds. Some of the trail alignments enter wetland buffer areas, primarily for the future trail in Area B. Although the impacts of the proposed alignments would be fully mitigated by preservation of resources in the open space areas, the future trail alignment in Area B would be resurveyed to determine if wetland impacts can be further minimized. Although the impacts for the trail in Area B have been evaluated and fully mitigated, the following has been applied to the project as a condition of approval: Prior to finalizing the alignment on the final map, a County-approved biologist and the project engineer would survey and may recommend adjusting the trail and sewer alignment (20-feet wide) in Area B to deviate not more than 100 feet south of the approved location on the tentative map. Changes to the alignment must reduce biological impacts by moving the trail away from alkali marsh to agricultural land or by increasing the width of the wetland buffer along Santa Maria Creek. The survey and alignment recommendations shall be done prior to approval of the final map and be reviewed and approved by DPLU (sewer) and DPR (trails). The applicant is only responsible for granting an easement for the trail in Area B because this trail would be constructed in the future by DPR in coordination with the Ramona Grasslands Preserve Public Access Plan. The applicant is responsible for construction of trails in Area A and Hardy Ranch. During construction of the trails, the Resource Manager, under the RMP, may make minor adjustments within the 20-foot wide alignment to further minimize impacts from trail use.

Utilities

Water

The Cumming Ranch project is located within the water service area of RMWD. No annexation process through the Local Agency Formation Commission (LAFCO) for water service would be required. The project site is located within the Downtown Operational Storage Zone of RMWD. Water connection for the project would be from a 16-inch-diameter main line that is being planned by RMWD for installation within Highland Valley Road. The new main line is part of the overall improvements proposed for RMWD's Downtown Operational Storage Zone. The Downtown Operational Storage Zone would receive its water from a new West End Terminal Storage reservoir, which is anticipated to consist of two, above ground 1.5-million-gallon tanks. These improvements are needed to serve the Cumming Ranch project, as well as other customers in the Downtown Operational Storage Zone. Currently, there is a 10-inch-diameter main line that serves the local area and extends through the project site within a former alignment of Highland Valley Road. The 10-inch-diameter main line receives its water directly from the Mount Woodson Terminal Storage.

Delivery for water service to the residences would be through 8- to 12-inch-diameter pipelines located within the project's internal streets. As required by RMWD, these pipelines would be looped to provide redundancy in supply, improve water quality by avoiding dead-end mains, and to meet fire flow demands and pressures by providing water from two directions to supply hydrants. The locations of the proposed water lines are shown in Figure 1-10.

Sewer

The project would be served by the RMWD wastewater system. Action by LAFCO would be required to allow RMWD to expand its latent powers to serve the project site. LAFCO is responsible for encouraging the efficient provision of public services, and has purview over changes to local government organization. The project is not currently served for sewer by RMWD. The project is not within the activated latent powers sewer service area of RMWD, but is within its Sphere of Influence. The latent powers expansion is a discretionary action subject to LAFCO review and approval. Prior to LAFCO consideration of the latent power expansion, the applicant would be required to participate in the update of a Municipal Service Review per Government Code Section 56430.

The SMWWTP is located within a parcel inset into the eastern boundary of Area B, directly south of Area C. The proposed sewer infrastructure for the property would be a combination of gravity flow combined with one lift station. The proposed sewer system is shown in Figure 1-11.

Because the project would not be mass graded, the sewer lines would be located in low-lying areas throughout the project site to allow for wastewater from residences to gravity-flow to the sewer lines. Some of the sewer lines would be located within internal roadways. Avoidance of mass grading and individual design of relatively large and specifically placed lots would require portions of the sewer alignment to be placed in open space areas at a lower elevation than the residential lots to facilitate gravity flow. The minimum width of the sewer easements to be located outside of street ROWs would be 20 feet.

The project would require a lift station to convey wastewater to the SMWWTP, as portions of the project site would be at a lower elevation than the treatment facility. The lift station would be located within an individual lot (Lot O) to be owned by RMWD. The lift station lot would be approximately 100 feet east of Lot 125, 250 feet northeast of Lot 110, and approximately 150 feet south of the northern property line of Area A (Figure 1-5). This lift station would be enclosed with a natural-looking façade to serve as an acoustical barrier that would reduce noise generated by the lift station. An emergency generator would be required as part of the lift station. In addition, standard odor-control devices would be installed to reduce potential odors.

The connection to the SMWWTP would be through a proposed 4- or 6-inch-diameter main sewer line that would run from the project's lift station directly to the SMWWTP, a length of approximately 4,560 feet. Of the total distance, approximately 2,190 feet would be located offsite within the adjoining Hardy Ranch property, and the remainder would be located within the project boundaries. The project owns easement rights for utilities within the Hardy Ranch property. These offsite locations are assessed and mitigated within this EIR, and these rights may be assigned to RMWD. To minimize impacts, the alignment of the main sewer line was designed to avoid crossing Santa Maria Creek, and would share the same alignment with a segment of the project's proposed trail system, where practical. The main sewer line would be located in a minimum 20-foot-wide easement that would be separate and independent of other existing lines that enter the treatment plant from the west, including the main sewer line from the Mount Woodson area. The alignment for the proposed main sewer line connection is shown in Figure 1-11.

As described in Section 3.6.1, RMWD is currently planning major improvements and expansion of the SMWWTP, which would increase the capacity of the facilities from 1.0 MGD to 1.47 MGD in three phases. Phase 1 would be designed to improve service to existing customers, Phase 2 would provide service for 608 additional equivalent dwelling units (EDUs), and Phase 3 would provide service for another 608 EDUs. This planned expansion of the wastewater service or lesser improvements are required to provide service for the Cumming Ranch project, which would add 125 dwelling units. RMWD has completed the CEQA environmental review process for the expansion of the SMWWTP, and it includes spray fields and wet weather storage to accommodate

future demand, including the Cumming Ranch project. The proposed project would require sewer infrastructure upgrades but RMWD has not determined what system modifications or improvements would be needed to serve the Cumming Ranch project. In a personal communication, RMWD indicated that incremental improvements to the system, rather than implementing the expansion project, may be sufficient to serve Cumming Ranch (Soto, 2012).

Removal of Existing Wells

There are two existing wells on the property that were used for livestock. Well Number 1 is located in Area A and Well Number 2 is located in Area B. Well Number 1 has two well shafts. The existing wells would be legally destroyed by a licensed C-57 well driller, under permit and inspection by the County of San Diego Department of Environmental Health. Said action would be taken before or at the commencement of any grading. Location of these wells is shown in Figure 1-12.

Specific Plan

Residential Landscaping and Design Guidelines

The Cumming Ranch project would be subject to the County of San Diego Water Conservation in Landscaping Ordinance, which requires a Landscape Concept Plan that is tailored to each lot if landscaping exceeds a threshold level. In addition, the Specific Plan provides design guidelines for implementation of the overall project, and provides details about landscaping, buffers and natural barriers, animal keeping, fencing and walls, lighting, drainage, and education. The overriding design theme established in the former Ramona Community Plan and the policies dictated for the Cumming Ranch SPA were to preserve and enhance the existing rural character of the community. Rural character would be enhanced in the project design by large lots, provisions for animal keeping, minimal grading, and an emphasis on natural landscaping. The incorporation of trails and pathways and a policy toward maintaining dark skies would further accentuate the rural character. Additionally, in keeping with the goals of the former Ramona Community Plan, large amounts of open space would provide for the permanent preservation of ridgelines, drainage areas, cultural resources, stands of oaks trees, and major rock outcroppings. Certain basic guidelines that would accomplish these goals are described below.

Landscaping

Landscaping requirements focus on maintaining a rural character and a seamless integration with the surrounding open space and grasslands. A Landscape Concept Plan was prepared for the

project to outline the specific details, such as allowed plant palette, fencing, and pathway design. The Landscape Concept Plan is shown in Figure 1-13. The Landscape Concept Plan focuses on the use of native plant species that are appropriate to the individual areas of the project to provide a smooth transition from the developed pad areas to the surrounding natural setting, and to act as a natural buffer between the interfacing land uses. Landscaping for the project would focus on maintaining the existing natural and unique features of the site, specifically oak trees and rock outcroppings. The proposed landscaping would accent and enhance the existing mature landscaping and natural features. Project entrances would be landscaped with clusters of oak trees and rocks.

Figure 1-14 shows a typical landscaping design for an individual lot. The majority of the homeowner-controlled landscape features are on the interior lot, which would serve as the active outdoor use area for the homeowner. This area could include lawns, small structures, patios, and children's play equipment. The active yard transitions into a more natural area that would blend into the adjacent open space preserve and also serve as a buffer between human activities and native areas. The design guidelines encourage a transitional landscape approach with native and naturalized plant material suited for sustainable maintenance practices. All plantings would be subject to the specified plant palette for each specific area.

Buffers and Natural Barriers

Natural buffers and barriers would separate development and open space areas as an alternative to the use of fences, walls, or other physical barriers. Separation would be established through the use of Limited Building Zones (LBZs), habitat buffers, and natural barriers. These buffers and barriers would serve the purpose of traditional fencing, but would allow integration with the natural setting, rather than appearing as a distinct separation. Figure 1-15 depicts the buffers and setbacks, as described below. In addition, when properly sized and designed, buffers serve as effective safety features to protect development from wildfires.

Limited Building Zone. Each lot within the development that would be adjacent to open space would contain an LBZ easement of a minimum of 100 feet in width measured from the lot line. The goal of the LBZ is to ensure adequate development area and the required 100-foot fuel modification zone around each structure without encroaching onto any adjacent open space area. Construction of homes would be prohibited in the LBZ. Certain plants and trees that burn easily would be prohibited in the LBZ. The list of prohibited plants and trees, as well as building requirements, can be found in the Fire Protection Plan prepared for the project (Scott Franklin Consulting 2010). Restrictions in the LBZ include prohibitions on (1) animal keeping without effective restraints or fencing; (2) lighting; (3) exotic invasive landscaping; (4) focal use areas

including arenas, pools, and patios; and (5) all structures, unless written verification is obtained from the County Fire Marshal that the structure will not require fuel modification to extend into biological open space. LBZ easements would require large animals to be kept within fences.

The LBZ serves multiple purposes. The primary purpose of the separation between homes and natural open space is to protect homes from potential wildfires that may occur within the open space. The LBZ would also prevent a structure fire from rapidly spreading into the natural open space. The LBZ serves as a buffer between the development and the open space. This would also reduce potential indirect impacts to open areas from lighting, noise, and encroachment by pets.

Habitat Buffer. Additional separation would occur beyond the property lines to protect sensitive habitat. The open space lots would contain both sensitive and nonsensitive habitats. A minimum buffer of 50 feet would be provided within the dedicated open space lots between sensitive habitats and the adjacent residential lots. The minimum 50-foot buffer for sensitive habitats within the open space lots, coupled with the 100-foot LBZ within the residential lots, would result in a design where all houses are set back from sensitive habitats by an overall separation of at least 150 feet.

Natural Barriers. Natural barriers discourage infringement into the open space, specifically at points where a person could choose to not follow the designated pathway or cut through the sensitive open space area. Natural barriers would include such materials as impassable brush, mounding, rocks, and trees or shrubs at potential entry points into the open space areas.

Signage. Because no fencing would be erected between most private lots and open space areas, signage would be posted every 50 feet along these boundaries to designate the transition from private lots to open space. The signage would include the following information:

Sensitive Environmental Resources
Area Restricted by Easement
Entry without express written permission from the County of San Diego
is prohibited. To report a violation or for more information about easement
restrictions and exceptions, contact the County of San Diego,
Department of Planning and Land Use.
Reference: (*3810-03-005*)

Setback Buffer. The project would include a 20-foot-wide buffer along the length of Voorhes Lane on Lots 120 through 125. The purpose of the buffer would be to maintain a vegetated area between Voorhes Lane and the adjoining lots to reduce potential sediment runoff. No grading or animal keeping would be allowed within the buffer, and soil disturbance would be limited to

landscape installation and maintenance. The buffer would maintain vegetative cover at all times; no bare soil would be allowed except where required for existing utility poles or fire prevention.

The project would also install a new fence along Voorhes Lane from the Hardy Ranch property to open space Lot H. The fence would consist of three- or four-strand wire with steel posts, similar to that being used by the County in and around the Santa Maria Creek. The fence would be continuous along the entire length, with no openings or gates, and also encompass the entire perimeter of open space Lot H for vernal pool protection.

The only allowed uses within the buffer would be establishment and maintenance of landscape, the perimeter fence, and the existing utility poles and anchor wires that provide service to the existing homes on Voorhes Lane. The perimeter fence and 20-foot-wide buffer would be shown and described in the project's Site Plan, and would be required to be maintained by all future lot owners.

Fire Protection Plan

A Fire Protection Plan was prepared for the proposed project (Scott Franklin Consulting 2010). The plan is based on a catastrophic wildland fire analysis, and provides measures and requirements to reduce the potential for wildfire damage to the project site. All measures contained in the Fire Protection Plan would be incorporated into the proposed project. The plan addresses defensible space for fire suppression resources through fuel management zones, included in the LBZ discussed above, and a specific plant palette with restrictions on highly flammable plant material. The plan also addresses issues such as infrastructure and structural fire protection, project access, secondary access/egress (fire and evacuation only), and water supply. The requirements in the Fire Protection Plan meet or exceed current fire code requirements, including requirements for residential fire sprinklers and enhanced fire resistive construction.

Animal Keeping

Animal keeping would be an important part of the rural character of the Cumming Ranch project. The proposed zoning for the residential lots would allow animal keeping that is consistent with the surrounding properties. All residential lots would have an "L" Neighborhood Regulation, as specified in the County's Zoning Ordinance, which allows large animal raising (livestock other than horsekeeping) with the following limitations: two animals on 1.5 acres or less, and one animal per 0.5 acre on lots that are 1.5 to 4 acres. The "L" Neighborhood Regulation permits horsekeeping (other than animal sales and services) without specifying a minimum lot size.

The Cumming Ranch Specific Plan also references restrictions in schedule "L" that limit livestock-type animals and permits horses. Large animal enclosures would be subject to the Architectural Character and Detailing Requirements of the Specific Plan, and fencing would be subject to Landscaping Guidelines of the Specific Plan. Fencing is envisioned on lots adjacent to open space and for animal keeping, but is otherwise discouraged in the Specific Plan.

Fencing would be required for keeping animals on lots with LBZ easements in proximity to the project's open space. The Site Plan establishes the LBZs and also addresses animal keeping within fencing. Proposals for animal keeping may also be reviewed by a Homeowners Association (HOA), but owners would be required to comply with the LBZ Easements, Site Plan, County Zoning Ordinance, and other applicable regulations.

An RMP was developed for the project (TAIC 2010), and includes restrictions on the outdoor activities of domestic pets, such as cats and dogs, because of the possible encroachment into the adjacent open space areas. The RMP would require, review, and monitor the following restrictions: dogs must be leashed at all times unless securely enclosed, cats must have bells on their collars, pets must be kept in the active yard area, and similar measures to reduce the potential for predatory or other activities that may occur when pets enter natural open space areas.

Fencing and Walls

Individual lots may be designed using individual noise barriers located within each lot to shield an exterior area. Noise walls could be made of masonry, wood, or transparent materials, such as glass or Lucite. Earthen berms or a combination of berms and walls would also provide noise attenuation. The noise protection easement language will contain a restriction stating that the structure and the exterior living area would be placed such that a noise barrier would complement the residence's architecture and would not incorporate a solid (opaque) wall in excess of 6 feet in height.

Fencing would be included in the project design to enclose animals, provide separation between the trails and adjacent private lots, provide separation between residential lots and Voorhes Lane, and protect the vernal pool area within open space Lot H. There may be special circumstances, such as roadways, that require the use of fencing where natural barriers or buffer areas would not create a physical separation. Allowed fencing types would include strand wire, wooden rail, or other natural materials. No chain-link or similar type of fencing would be permitted. Grading plans would require that permanent signage and markers be placed every 50 feet along the edge of residential lots to distinguish the boundaries between residential lots and open space areas.

Lighting

No street lighting would be used within the proposed project. Homeowners could have exterior lighting within allowed parameters, such as using motion lights, shutoff timers, and downshielding. Minimal lighting at the major entry points along Highland Valley Road and entry signage is proposed.

Drainage

Specific areas would be designed to prevent runoff from stables and corrals. Maintenance requirements, such as removal of manure from corral and stable areas, would be created to prevent contaminated runoff from entering drainage areas. Requirements for manure management and vector control would be enforced through the San Diego County Code of Regulatory Ordinances Section 64.203–64.330. Homeowners would be provided with information and options on drainage requirements and ongoing maintenance.

Education

Education of Cumming Ranch homeowners and onsite recreational trail users would be an important component of the natural design of the site. These users would be educated on the importance of the natural resources that exist on the project site. Education of homeowners would begin before purchase through property disclosures. Information presented to home buyers would include descriptions of wildlife and vegetation native to the area, explanations of local cultural resources, limitations on activities that may occur in community open space areas, restrictions on sensitive resources that may exist on individual properties, and legal implications of disturbing cultural resource sites.

Education would be an ongoing process, and may include yearly educational tours by biologists, updated information concerning the importance of natural resources and related policies protecting those resources, and ideas on how people can celebrate the natural surroundings without causing harm. Signage would be provided along key points between developed areas and open space areas to indicate that the area is a sensitive open space preserve and no entry is allowed except on designated trails. Educational programs and measures would be implemented through the RMP.

Open Space Component

The proposed project includes 457.8 acres of permanent open space (67% of the project site). The following is a breakdown and description of the open space areas throughout the site, as defined by Areas A, B, and C. Land that is not required as mitigation or avoidance for the proposed project's environmental impacts may be designated as open space on the Specific Plan map. Dedication of easements or resource management would not be required for such land. The locations of open space easements are shown in Figure 1-16.

Area A

Area A consists of 358.7 acres, of which 215.0 would be designated for residential development and 143.7 would be dedicated as open space. The 143.7 acres of open space would be used as the primary location for the project's biological mitigation requirements. The 143.7 acres of open space would be managed in perpetuity, pursuant to an RMP or other County-initiated management plan, and would be subject to an open space easement(s) granted to the County. The location(s) of open space easement(s) are shown in Figure 1-16.

A Landscape Maintenance District would be established by the owner for funding, in perpetuity, management and maintenance of the 143.7 acres of dedicated open space easements in Area A.

Area B

Area B consists of 201.0 acres that would be designated as open space. The owner plans, following recordation of the final map, to convey by sale 138.5 acres of Area B to the County or to a conservancy acting on behalf of the Ramona Grasslands Preserve, for inclusion in the Ramona Grasslands Preserve. The owner would be authorized, until such time the sale is consummated, to continue farming operations on the 138.5 acres, and to have access to existing farming roads.

The remaining 62.5-acre portion of Area B would be used for the project's biological mitigation requirements, and would be subject to an open space easement(s) granted to the County. It would be managed in perpetuity pursuant to an RMP or other County-initiated management plan after conveyance of the open space easement(s). The open space easement(s) would be self-extinguishing and would vacate automatically if the 62.5 acres are conveyed to the County in fee title. The location(s) of open space easement(s) are shown in Figure 1-16.

An endowment would be provided by the owner for funding, in perpetuity, management and maintenance of the 62.5 acres of open space easements used for the project's biological mitigation in Area B. Funding for management and maintenance of the remaining 138.5 acres in Area B would be the responsibility of the County or conservancy purchasing Area B in fee title.

Area C

Area C consists of 113.1 acres that would be designated as open space. The owner plans, with recordation of the final map, to convey by donation Area C in fee title to the County or to a conservancy acting on behalf of the Ramona Grasslands Preserve, for inclusion in the Ramona Grasslands Preserve.

A 38.4-acre portion of Area C would be used for the project's biological mitigation requirements, and would be subject to an open space easement(s) or other legal guarantee of permanent open space granted to the County. It would be managed in perpetuity pursuant to an RMP or other County-approved management plan after conveyance, but prior to approval of, the first final map for the project. The open space easement(s) would be self-extinguishing and would vacate automatically if conveyed to the County in fee title. Additionally, the County agreed to own and manage existing open space easements, totaling approximately 22.2 acres. Collectively, these easements are commonly referred to as the Ramona Vernal Pool Preserve. The locations of the open space easements are shown in Figure 1-16.

An endowment will be provided by the owner for funding in perpetuity the management and maintenance of the 38.4-acre open space easement(s) used for the project's biological mitigation in Area C. Approximately 22.2 acres of existing open space easements owned by the County have endowments. Funding for the management and maintenance of the remaining 65.3 acres in Area C would be the responsibility of the County or conservancy accepting the donation of Area C in fee title.

Open Space Enhancement

Specific natural areas throughout Area A, as shown in the Conceptual Revegetation Plan (Appendix D), would be enhanced with compatible and appropriate plantings to increase wildlife habitat and natural aesthetic value. These areas would also be mitigation for wetland impacts and for oaks that would be subject to direct and indirect impacts. One component of this design element would include the enhancement of the drainage corridors within Area A with native plant species such as mule fat scrub or willows to provide additional protective cover for birds and small animals. The second component would include planting local Engelmann and coast

live oak trees within appropriate open space areas in the northern section of Area A to provide foraging, breeding, cover, and nesting areas for birds and other wildlife species that are associated with oak woodland habitats. The conditions of approval require approval of the final revegetation plans and bonding prior to approval of the first final map for the project.

Planning Component

This project component section involves the overall land use planning of the project. Also included in this discussion are the major discretionary approvals required for project implementation. Additional discretionary approvals required for project implementation are summarized in Section 1.3.1 and Table 1-5.

General Plan Amendment

The General Plan Amendment was withdrawn in February 2012 because it was no longer needed following approval of the County's General Plan update on August 3, 2011. As part of the General Plan update, the (21) Specific Plan Land Use designation was replaced with a mixture of SR-2, SR-10, and RL-40 designations. Additionally, project-specific criteria for developing the Cumming Ranch Specific Plan area was removed from the Ramona Community Plan text. The former Ramona Community Plan described the Cumming Ranch SPA as having a density of 0.25 dwelling units per acre, permitting "166 single-family dwelling units that ranged in size from 2 to 4 or more acres." It also planned industrial uses next to the Ramona Airport. The proposed Cumming Ranch Specific Plan complies with the updated General Plan policies and land use designations. In Area A, it would allow 125 single-family homes on minimum lot sizes ranging from 1 to 4 acres, yielding a residential density of 0.18 dwelling units per acre. In Area C, it designates 113.1 acres as Open Space to be made part of the Ramona Grasslands Preserve, and it makes the remaining 201.0 acres in Area B available for purchase as open space by a conservancy. In the event that Area B is not acquired, the owner would be allowed to continue existing agricultural uses on that portion of the site.

Specific Plan

A Specific Plan would be required for implementation of the proposed project. The land use plan for Specific Plan 03-005 is shown in Figure 1-3, and proposes three distinct land use areas of the project, as described above. Table 1-1 outlines the proposed development throughout the project site and Table 1-2 provides a land use summary. Additional provisions of Specific Plan 03-005 address recreational uses, design guidelines, conservation/environmental issues, circulation, and utilities and public facilities, as required by the Ramona Community Plan. These provisions are

detailed in the text of the Specific Plan itself. Design considerations that also serve as regulatory compliance are listed in Chapter 8.0, List of Mitigation Measures and Environmental Design Considerations.

As described in Table 1-2, the land use designations generally include two main categories: Open Space and Rural Residential. The Cumming Ranch Specific Plan would establish two Open Space land use designations (OS-1 and OS-2). Development is not allowed within OS-1 or OS-2, with the exception of infrastructure and public utilities, trails, and related improvements shown on the project map (TM5344RPL). OS-1 lands are those lands to be set aside for permanent preservation with project implementation. Approximately 257.6 acres of the Cumming Ranch property would be designated as OS-1. The OS-2 designation would allow for the continued use of agriculture within Area B until it is purchased for open space conservation. Approximately 201.0 acres would be designed as OS-2. A total of 457.8 acres (67%) of the Cumming Ranch property would be designated as open space.

The Rural Residential (RR) designation of Area A allows for the development of 125 dwelling units on lots ranging from 1.0 to greater than 3.1 acres in size, with an overall density of 0.18 dwelling units per acre. The average lot size is 1.5 acres. In total, the Cumming Ranch project would designate approximately 215.0 acres for RR use. Agricultural uses within private lots would be allowed in conformance with RR use regulations and may include horticulture, tree crops, and row and field crops, among others.

Tentative Map

In addition to the GPA and Specific Plan, a TM would be required for approval of the project and is shown in Figure 1-6. TM 5344 provides additional detail on proposed pad grading, slopes, individual lot design, and open space areas. Custom pad grading shown on TM 5344 would result in balanced cut and fill grading on each lot to create level building sites. The increased ratio of horizontal length to vertical height enables the graded slopes to be more easily landscaped and maintained, and the potential for soil erosion is reduced. TM 5344 also provides additional details on the LBZs. These project features were described previously under Buffers and Natural Barriers, and are shown in Figure 1-15.

Site Plan

A Site Plan would be required to implement certain physical design features of the Cumming Ranch project. The Site Plan will cover all residential lots within the project. All lots within the project would be required by the Site Plan to implement the California Green Building Code,

provide solar hot water heaters, minimize outdoor water usage, and provide a minimum of 10% of the energy consumption from renewable energy generation sources. The Site Plan also identifies specific lots that contain LBZs, noise mitigation easements, or building restricted areas.

Project Implementation

Once all necessary entitlements and approvals are secured for the Cumming Ranch project, final engineering would begin. Final engineering includes preparation and approval of the final maps in up to six phases with all related construction plans for roads and utilities. All mitigation would be tied to the first map or to the site plan. It is anticipated that final engineering would take 6 to 9 months to complete. The property conveyance of the northernmost 113.1 acres (Area C) donated by the owner in fee title would occur concurrent with the County issuing the first final map. All final permits and approvals from various agencies with jurisdiction over the project would be required.

Once final engineering is completed and mitigation is completed or secured, the first final map would be recorded, construction permits would be issued, a detailed construction schedule would be developed, and preconstruction meetings would occur with the owner's representatives, contractors, and governing agencies. Construction staging, SWPPPs, fire prevention, and habitat protection would be monitored by the owner's representatives. The sequence of construction activities from planning to finalized buildout is described in detail below under Project Phasing.

Evaluation of temporary and permanent construction impacts assumes that all residential lots would be affected by construction or subsequent homeowner activities. This is a conservative assumption because, within each individual lot, only the actual residential pad and driveway access would be directly impacted by construction. Additionally, the effects of temporary construction impacts may occur up to a distance of 20 feet along each side of project streets and the sewer line easements. The disturbance would be predicated on access, and unforeseen circumstances would be minimized by properly identifying features that would remain. Except when beneath an existing or proposed roadway, all areas of temporary construction impacts would be regraded to match the adjacent natural terrain and landscaped in accordance with the approved landscape plan, which would provide for vegetation similar in composition (e.g., hydroseeding) to the surrounding environment. The proposed hydroseed would consist of grasses and vegetation that would reintroduce native species back into the existing nonnative landscape.

Project Phasing

The first of up to six project phases of development would include all roadway improvements to Highland Valley Road, SR 67, and the intersection of Highland Valley Road and SR 67; all offsite sewer improvements for the connection to the existing wastewater treatment plant, all internal project sewer mains necessary to serve the phased development, and the sewer pump station; all internal water improvements necessary to serve the initial development phase; and all community-level trails and the Highland Valley Road pathway. The existing water wells and any remnants of the former septic system would also be abandoned and/or removed during the first phase. All required open space and LBZ easements would be dedicated before beginning any construction.

It is anticipated that the streets, utilities, and pads would be constructed over time in a phased sequence. Development of the residential lots would likely begin in the southern portion of the site and proceed toward the north. Construction would begin with the rough grading of the streets within the initial phase and installation of the offsite improvements. Building pads on the individual lots would most likely be constructed concurrent with the rough grading of the streets. All the streets and pads would not be graded at one time.

Subsequent development phases would include grading and construction of roadways and utilities necessary to serve that particular phase.

Development of the residential lots would include grading of the building pads and establishment of the LBZs. Building homes on the lots may begin as soon as the pads are completed and utilities are available. This could take place as soon as 90 to 120 days after the commencement of initial construction. Based on anticipated average sales of three to four homes per month, the typical time from the start of sales to the completion of all homes would be between 3 and 5 years. Table 1-4 provides an outline of the assumed project implementation timeline.

1.1.3 Technical, Economic, and Environmental Characteristics

This subchapter provides details about the project background that influenced specific design and development of the Cumming Ranch project. Details concerning technical, economic, and environmental characteristics that guided project elements that were incorporated to enhance the project and meet regulatory compliance requirements are also included. Table 1-6 provides a brief summary of the design features included in the project to positively benefit each resource area. As described below, specific design features were incorporated to create a project that was responsive to the existing community atmosphere and future planning efforts in the area.

Project Background Information

The Ramona area has many ongoing planning and conservation efforts. Three of these conservation efforts are located in the vicinity of the Cumming Ranch SPA and have played a role in the planning and design of the project. These efforts are described below and include the Ramona Grasslands Preserve, Ramona Vernal Pool Preserve, and Santa Maria River Park.

Ramona Grasslands Preserve

The County has been involved in the preparation of regional open space programs, including the Multiple Species Conservation Program (MSCP) and the development of the North County MSCP Subarea Plan. These plans are intended to protect endangered habitats and species, and promote continued biodiversity by creating a network of large interconnected habitat preserves throughout San Diego County. The Ramona grasslands are a significant potential preserve area in the proposed North County MSCP.

On June 1, 2000, the RCPG approved a conceptual plan for the Ramona Grasslands Greenbelt (Ramona Grasslands Preserve). The concept envisioned the purchase of approximately 5,000 acres of privately owned lands in the western areas of Ramona for establishing a grasslands preserve. The general boundaries of the Ramona Grasslands Preserve are shown in Figure 1-4.

On November 11, 2000, the County Board of Supervisors approved the concept for the Ramona Grasslands Preserve. The County Board of Supervisors directed the Deputy Chief Administrative Officer to work with the Grasslands Preservation Project to seek potential sources of funding for the acquisition of the grasslands in Ramona. The County Board of Supervisors directed that purchase of private land would be from willing sellers only.

In July 2002, DPLU distributed a white paper (County of San Diego 2002a) for the Ramona Grasslands Preserve to landowners (under cover letter of Second District Supervisor Dianne Jacob, dated July 15, 2002). The white paper delineated specifics about the acquisition program for lands to be acquired for the proposed Ramona Grasslands Preserve, including how landowners could participate in the program. According to the white paper, the proposed Ramona Grasslands Preserve could cover approximately 4,000 acres. A separate study map for the Ramona Grasslands Preserve indicates approximately 8,000 acres of grasslands exist from which the preserved acreage could be potentially acquired.

As of March 2010, the County had acquired approximately 3,491 acres of land for inclusion within the Ramona Grasslands Preserve. These acreages include all, or portions of, the Cagney Ranch (390 acres), Oak County I (220 acres), Hardy Ranch (70 acres), Oak Country II (486

acres), Davis-Eagle Ranch (946 acres), and Gildred property (1,379 acres) (County DPR 2010). In the instance of the Hardy Ranch, the Iron Mountain Conservancy participated with the County in the acquisition.

As described above, the Cumming Ranch project would make available a total of 457.8 acres of open space for inclusion in the Ramona Grasslands Preserve.

Ramona Vernal Pool Preserve

The northern portion of the project site, Area C, located generally between Santa Maria Creek and Ramona Airport Road, contains environmentally sensitive vernal pools that support the federally endangered San Diego fairy shrimp (*Branchinecta sandiegoensis*). The project area north of Santa Maria Creek (113.1 acres) is currently fenced to restrict cattle grazing or any agricultural operations that would impact those resources. There are two smaller "satellite" pools south of this area, one in Area A and one in Area B, that are individually fenced. A total of 56 acres in Area C are managed as a mitigation bank for the sale of conservation credits. To date, approximately 22.2 acres are protected by conservation easements. Collectively, these easements are referred to as the Ramona Vernal Pool Preserve.

Santa Maria River Park

On March 3, 2000, RCPG approved the conceptual plan for the Santa Maria River Park. The plan envisions a linear greenbelt park along Santa Maria Creek that would connect various parks, key business areas within the Ramona Town Center, and a planned intergenerational center. It would include a series of pathways and hiking trails. In July 2001, the County Board of Supervisors endorsed the plan and directed the Chief Administrative Officer to work with interested parties to identify and obtain funding to acquire land along Santa Maria Creek to implement the plan. The Cumming Ranch project site has approximately 0.5 mile of frontage along Santa Maria Creek through Areas B and C.

Environmental Characteristics

The following section contains a description of unique environmental characteristics and constraints of the project site and setting. Often, a unique environmental feature on the project site was considered a development constraint, as the project design strived to maintain a natural setting with minimal impacts to existing site features. The initiation of the Cumming Ranch project began with a thorough assessment of the existing environmental resources on the property. Known resources include vernal pools supporting federally endangered species,

sensitive native habitat, archaeological sites, floodplains and floodways associated with both Santa Maria and Etcheverry creeks, and one key ridgeline with slopes that are more than 25%. The Cumming Ranch project was designed specifically to incorporate into the surrounding environment and to avoid potential impacts, as discussed below.

Grasslands

The project site is located within a unique area of open space grasslands. The County DPLU developed a white paper in June 2002 that directed the formation of the Ramona Grasslands Preserve through multiple planning efforts, including the compilation of land from willing sellers. In response to the white paper and ongoing efforts to form the Ramona Grasslands Preserve, the project owner would willingly participate in making available 457.8 acres of privately owned lands for the formation of the Ramona Grasslands Preserve. The dedicated open space in Area A, plus all of Areas B and C, would be made available for inclusion in the preserve, providing approximately 10% of the open space lands needed to achieve the County's goal of 4,000 acres for the preserve, as called for in the white paper. Participation in the grasslands preservation effort drove the design of the project to confine all residential development to the south of Etcheverry Creek. The desire to blend with the grasslands dictated large lots, a natural landscaping plan, minimal grading, and avoidance of unique landforms and other natural design features. The project would be designed with minimal fencing to maintain the open and seamless integration with the adjacent natural grasslands and open space areas throughout the site.

Vernal Pools

As described above, within the northernmost portion of the project site is a relatively pristine collection of vernal pools, known as the Ramona Vernal Pool Preserve. Currently, 22.2 acres in this area are protected by conservation easements. A number of the pools contain the federally endangered San Diego fairy shrimp. These protected vernal pools, San Diego fairy shrimp, and conservation easements are a development constraint. For this reason, the project design avoided any development in the vernal pool area. All of the vernal pools, along with added acreage for a protective buffer, would be placed in permanent open space. The project was designed to avoid impacts to the vernal pools and their watersheds, create additional buffer area, and provide protection for this unique collection of vernal pools. All project trails were designed specifically to avoid vernal pools and vernal swales.

Wildlife Habitat

Wildlife, including raptors, currently use the project site for foraging and movement. Santa Maria Creek and Etcheverry Creek serve as wildlife habitat and east/west linkages. The northern and central portions of the project site form a connection between the Ramona Grasslands Preserve to grassland areas south of SR 67, providing north/south connectivity. The need for connectivity between grassland areas to the northwest, through the site, and continuing to the south influenced project design. Thus, all development would occur in the southern areas of the site, leaving both creeks undisturbed and providing Areas B and C as permanent open space to allow continued movement through the area. Specific natural areas throughout the open space in Area A would be enhanced with compatible and appropriate plantings to increase wildlife habitat.

Santa Maria Creek and Etcheverry Creek

As noted above, Santa Maria and Etcheverry Creeks serve as wildlife habitat and linkages, as well as serving as major tributaries for the area. These creeks are also protected under the County Resource Protection Ordinance (RPO). In addition, as described above, RCPG approved a conceptual plan for a linear park along Santa Maria Creek. For these reasons, the project design was developed to protect both creeks in their entirety as they pass through the project site by placing them in permanent open space. The total onsite linear frontage preserved along Santa Maria Creek by the proposed project would be approximately 2,700 feet and along Etcheverry Creek would be approximately 2,900 feet.

Natural Landforms and Vegetation

The project site has many unique landforms and features such as a main ridgeline through the center of the project site, substantial rock outcroppings, natural drainages, and stands of mature Engelmann and coast live oaks. Some areas of the project site, such as the rock outcroppings, contain cultural resources. The desire to maintain a natural openness to the project, integrate it with the adjacent grasslands, and incorporate the rural character of Ramona required careful design of the residential portion of the project to avoid removal or destruction of the natural features of the project site. All of the major ridgelines, significant rock outcroppings, and natural drainages would be protected by placement in open space. The majority of Engelmann and coast live oaks would be placed in permanent open space. Those Engelmann and coast live oaks located within residential lots would not be removed but would require mitigation because they would eventually be within privately owned lots. The oaks and rock outcroppings within lots would be used as a prominent feature for additional natural landscaping design and enhancement.

Additionally, to avoid alterations to natural landforms, lots would be of sufficient size and specifically shaped to allow the individual positioning of driveways and building pads to facilitate the use of minimal grading techniques and more natural landscaping practices. Only the driveway and pad would be graded. The majority of every lot would be left in the natural state to ease the transition between the lots and the adjoining open space areas. Mass grading and the creation of artificial slopes would be greatly reduced, and each lot would have a balanced cut/fill. It is estimated that grading would be reduced by 65% as compared to traditional mass grading. The natural buffers within the private yards, as well as the designated open space, would help to minimize spillover into other sensitive areas, including wildlife areas and adjacent residential properties. The large area of permanent open space would also protect the cultural resources in those areas.

Regulations/Policies

Multiple policies and regulations influenced the initial design for the Cumming Ranch project. A complete policy analysis is provided in Section 4.1.4 of this EIR; however, below is a discussion of policies that played a role in the creation of the project design.

Ramona Community Plan

The Ramona Community Plan outlines policies and guidelines for development within the Ramona area. The project design was shaped and influenced by the need to be compliant with the Ramona Community Plan and the goal of maintaining a rural community feel. Design features that are incorporated to maintain the rural character and open space ambiance of the area include no gating of the community, public pathways and trails through the project site, minimal fencing, avoidance of major ridgeline disturbance, minimal landform alteration, minimal lighting, provisions for animal keeping, retaining mature oak trees and other native landscaping, and natural buffers and barriers. The Landscape Concept Plan was designed with a natural plant palette to blend the project with the existing vegetation and provide a seamless transition between the residential development area and the adjacent open space areas and grasslands. Many other specific project features, as described in Section 1.1.2, resulted from policies and goals of the Ramona Community Plan.

County of San Diego Zoning Ordinance

The San Diego County Zoning Ordinance (County of San Diego 2003b) is applicable to all unincorporated areas of San Diego County. All land and structures, and the construction,

reconstruction, alteration, expansion, or relocation of any structures must conform to all regulations established in the Zoning Ordinance.

Currently, the Cumming Ranch site is zoned as an SPA (S88) (County of San Diego 2004c). Until a Specific Plan applicable to the property is adopted, the following use types are permitted by the S88 Use Regulations: residential, civic, and agricultural (County of San Diego 2003b). Almost the entire area surrounding the project site is zoned as Agriculture, including both A70 and A72 zoning designations. The agricultural zoning extends into the Ramona Town Center as well as the residential areas developed in the vicinity. A small portion near the northwest corner of the site is zoned as a separate SPA (S88) and extends westward. The area to the north that encompasses the Ramona Airport is zoned as Industrial.

The Cumming Ranch SPA is proposing two main land use categories: Open Space (OS) and Rural Residential (RR). A total of 457.8 acres of the Cumming Ranch property would be designated as OS and approximately 215.0 acres would be designated as RR. Of the 457.8 acres of OS, approximately 201.0 acres would allow for the continued use of agriculture until purchased for open space conservation.

Resource Protection Ordinance

The RPO is designed to protect the County's environmentally sensitive lands such as wetlands, wetland buffers, floodplains, steep slopes, sensitive habitat lands, and significant prehistoric and historic sites. Many of these sensitive types of resources occur within the project site. For this reason, the design of the project focused on the protection of those resources, and incorporated features to avoid RPO resources. The avoidance of RPO resources was a main consideration in the concept behind lot layout and size, roadway and utility alignments, placement of large portions of the site in permanent open space, and minimal grading.

Community Trails Master Plan

The County Trails Program implements the Community Trails Master Plan, which was adopted by the County Board of Supervisors on January 12, 2005. The Cumming Ranch SPA lies within the Ramona segment of the Community Trails Master Plan titled Ramona Community Trails and Pathway Plan (County of San Diego 2005a). Within the Ramona Community Trails and Pathway Plan, the Trails and Pathways for Ramona Map (County of San Diego 2004b) shows portions of two community trails and one pathway within or adjacent to the Cumming Ranch SPA. The proposed alignments of the trails as part of the Cumming Ranch project are very similar to the location of the trails on the Trails and Pathways for Ramona Map. The Cumming Ranch

community trail system is expected to interconnect and become part of a future regional trail system. The project trail system was established in consultation with the Transportation and Trails Subcommittee of the RCPG and the Ramona Trails Association, which has held meetings and site visits to determine the best trail alignment and with the wildlife agencies. It is anticipated that this trail system would be part of a larger community trail system, including a future regional trail along Santa Maria Creek.

Following public review of this EIR, the County determined that the 2-acre staging area and associated trail in Area C needed to be removed from the project. DPW Airports Division determined that granting access to the staging area from Airport Road and allowing a pathway along Airport Road would not be allowed under the existing Federal Aviation Administration (FAA) airport easement (March 5, 2012). Therefore, trail access from Airport Road and to other portions north of Airport Road is not possible. In addition, the wildlife agencies determined that trails in Areas B or C would have to be developed as part of the Ramona Grasslands Preserve (Agency Meeting, March 1, 2012). Trails will be constructed only within the project footprint in Area A and in the County-owned Hardy Ranch. A trail right-of-way south of Santa Maria Creek in Area B will be dedicated for a future trail, that DPR may construct.

San Diego County Consolidated Fire Code

The San Diego County Consolidated Fire Code prescribes regulations governing conditions that are hazardous to life and property from fire. Due to substantial amounts of open space in and around the Ramona community, the project site and surrounding area are subject to the threat of wildfires. The project was designed to meet all requirements of the Consolidated Fire Code, as well as additional measures outlined in the Fire Protection Plan (Scott Franklin Consulting 2010). Some of the requirements that influenced project design include adequate cul-de-sac lengths, looped roadways, secondary access/egress points for fire and evacuation only, and fuel modification zones. The project was designed to exceed the minimum requirements for roadway widths, and includes turnouts for emergency equipment.

Technical Characteristics

The following section describes various engineering requirements and land use density considerations that were necessary in the design of the proposed project.

Access

Entrances to and exits from the project site were designed via Highland Valley Road for all portions of the residential development. Access from areas other than Highland Valley Road would be difficult due to land ownership considerations. There are other roadways adjacent to the project site, such as Voorhes Lane; however, it is a private roadway and not appropriate for site access. An alternative access point could be from the Ramona Town Center adjacent to the east of Area B; however, an access road from this location would require traversing and bisecting a large open space area and also crossing Etcheverry Creek. No other roadways pass through the project site, and Highland Valley Road is an ideal access point as there is no need to cross through large undeveloped portions of the site to access the residential areas. Four entry points would serve the project. No additional access points on Highland Valley Road were considered, as there would not be adequate spacing between the turnoffs for safety. Project access was also designed to meet emergency access requirements. The project includes two additional secondary access/egress roads for fire and evacuation only.

Utility Alignment

The avoidance of mass grading on the project site necessitated the unique location of sewer lines. Without mass grading of the site, it is not possible to design the sewer lines within the internal roadway system to operate as a complete gravity-flow system. For this reason, the sewer lines were placed not only in roadways, but also in low-lying areas throughout the project site. A lift station would be required to convey wastewater to the SMWWTP, which is located at a higher elevation than the proposed residential development.

Land Use Density Considerations

The former Ramona Community Plan allowed a total of 166 residential units throughout the project site. However, the Cumming Ranch project only proposes 125 residential units. This decision to reduce the onsite density results from careful consideration of lot placement and size based on surrounding sensitive resources and natural landforms within Area A. Each lot was designed to result in a balanced cut/fill within the site, incorporate natural features, and minimize grading. Although the former Ramona Community Plan allowed for a higher density, the placement of only 125 units on the project site would help to maintain the open space feel and rural atmosphere of the community, and meet individual lot design criteria.

1.2 Project Objectives

The project proponent designed the proposed project to fulfill the following objectives:

1. Provide a residential development with an environmentally sensitive project design (Accommodate the Ramona Grasslands Preserve and other regionally important resources through an environmentally sensitive project design).
2. Provide a residential development that reflects Ramona's rural character and country lifestyle by minimizing impacts to natural drainage areas, major rock outcroppings, ridgelines, and major stands of oak trees.
3. Through design, seamlessly integrate the development portion of the project with adjacent natural areas.
4. Implement a scenic and meaningful trail system.
5. Integrate the existing Ramona Vernal Pool Preserve into the Ramona Grasslands Preserve.

As designed, the Cumming Ranch project would meet and fulfill all five of the objectives stated above.

1.3 Intended Uses of the EIR

This EIR is an informational document that informs public agency decision-makers and the general public of the significant environmental effects of the project, identifies possible ways to minimize the significant effects, and describes reasonable alternatives to the project. This EIR is a "Project" EIR, and it is anticipated that its certification will result in CEQA compliance for the whole of the project.

1.3.1 Matrix of Project Approvals/Permits

This EIR will be used by several agencies who will be considering numerous project approvals and permits. The types of approvals and agencies are listed in Table 1-5. Where an agency would issue more than one approval or permit, the approvals or permits are listed in order of occurrence.

1.3.2 List of Related Environmental Review and Consultation Requirements

Federal, state, and local laws, regulations, and policies were considered in preparation of this EIR. Environmental review is required by all agencies that have any responsibility or jurisdiction over the project. Consultation is required by the California Department of Fish and Game (CDFG) for a 1602 Streambed Alteration Agreement, CDFG and U.S. Fish and Wildlife Service

(USFWS) for consultation related to the Natural Communities Conservation Plan (NCCP) for coastal sage scrub loss, the Regional Water Quality Control Board (RWQCB) for a 401 Water Quality Certification, the U.S. Army Corps of Engineers (ACOE) for a 404 Permit, LAFCO for expansion of the RMWD latent powers, and the Regional Airport Authority and FAA for land use compatibility.

1.4 Environmental Setting

Located within the San Diego area of Southern California, the community of Ramona is known for its rural character and natural setting. Ramona is more than 20 miles northeast of downtown San Diego, and maintains a small community atmosphere tied to historic agriculture operations. The Ramona area has varied high-desert topography, including larger summits such as Mount Woodson and Iron Mountain. The region continues to experience fairly rapid growth and population increases.

The pattern of land uses adjacent to the project site is quite varied. The Ramona Town Center boundary abuts the property to the north and east. Within this boundary is the Ramona Airport (adjacent to the northern Area C property boundary). Located to the east of Areas B and C is the Ramona Town Center with single-family homes on lots typically 1 to 2 acres. To the south and west of the site is residential development on lots averaging 2 to 5 acres. North of the Area A boundary are homes on lots generally 5 acres or larger. To the northwest of the project site is a large area of open grasslands.

Regional access to the project site is via SR 67. Local roadways that serve the site include Highland Valley Road and Dye Road (Figure 1-2). SR 67 provides access to the Lakeside and Poway areas west of Ramona, and Julian east of Ramona. Within the study area, SR 67 is developed with two through-lanes and shoulders. Approximately 850 feet of frontage on SR 67 is located in the southwest corner of the property. Highland Valley Road provides access to SR 67 for the properties located to the north. Highland Valley Road passes through the boundaries of Area A. The portion of this roadway within the study area is currently improved to two lanes with shoulders, with a pavement width varying from 36 to 40 feet. All entries to the property would be off of Highland Valley Road. Dye Road, located south of the intersection with SR 67 and Highland Valley Road, currently provides access to the San Diego Country Estates development and the Barona Indian Reservation to the south. Dye Road within the study area is currently improved to a two-lane facility, with a pavement width of approximately 40 feet.

The physical features of the project site lend themselves to division of the property into the three distinct areas introduced earlier. The topography of the southern portion of the property (Area A)

is most diverse, consisting of rolling uplands interspersed with rocky outcrops and drainages. The dominant topographic feature of Area A is the generally east/west-trending ridgeline. Small stands of Engelmann oak and coast live oak are scattered throughout portions of the area. One satellite vernal pool is located in the extreme northwest corner of Area A, along the southern side of Voorhes Lane. A ridgeline of steeper hillsides in the northeasterly portion of the area accentuates the diversity of the area's topography. Elevations in the southern area vary from 1,368 feet to 1,576 feet.

The middle of the project site (Area B) is located generally between Santa Maria Creek on the north and Area A to the south. The topography in this central area consists mostly of a wide-open, fairly level plain extending from Etcheverry Creek north to Santa Maria Creek. One satellite vernal pool is located in the southwestern corner of Area B. Elevations range from 1,359 feet to 1,392 feet. This open area has minimal rock outcroppings or other unique features.

The northern area of the property (Area C) is generally located between Santa Maria Creek and Ramona Airport Road. About 50% of this area consists of creek, wetlands, and shallow drainage areas. The remainder of the area consists of nonnative grasslands. A unique clustering of large boulders and rock outcroppings appears along the eastern boundary. Elevations in the northern area range from 1,365 feet to 1,400 feet, with the higher elevations being in the north along Ramona Airport Road. In this area, 22.2 acres are protected by conservation easements and are collectively known as the Ramona Vernal Pool Preserve. To protect the sensitive vernal pools, Area C is fenced.

The primary drainages on the site are Santa Maria Creek located in the northern portion of the site and Etcheverry Creek that runs through the central portion of the site. These two creeks drain from east to west and eventually converge just west of the property boundary. Santa Maria Creek is lined with trees, particularly in the eastern half. Etcheverry Creek is not characterized by trees or lush vegetation. Two smaller unnamed drainages occur in the southern portion of the site, flowing northward across Area A and ultimately joining Etcheverry Creek. The drainages can be seen in Figure 1-5.

The Cumming Ranch SPA is dominated by agricultural land as the result of historic and ongoing agricultural activities. The project site has historically been used for cattle grazing and dry-land farming of oat-hay. Agricultural activity continues in the middle and southern portions of the site. Portions of Area A that lend themselves to farming are tilled and used for dry oat-hay production or grazing. The majority of Area B is farmed or grazed. All of Area C is fenced to prevent any cattle grazing or other agricultural activity in the vicinity of the vernal pools. The

only structures on the site are remnants of two old windmills and a wooden cattle corral. Section 4.1.3 describes in detail the ongoing agricultural activity onsite.

Natural vegetation remains on portions of the site that are not conducive to agricultural use. These areas include the central ridge, numerous pockets of rock outcroppings, slopes interspersed throughout the site, and along drainages. Habitats include coastal sage scrub, oak woodlands, and chaparral. Vernal pools in Area C are primarily clustered along two shallow drainage areas that slope toward Santa Maria Creek. Focused studies have confirmed the presence of San Diego fairy shrimp in certain pools. San Diego fairy shrimp is a federally listed endangered species. The full detailed discussion of existing biological resources onsite is provided in Subchapter 3.1.

1.5 Consistency of Project with Applicable Regional and General Plans

The project is consistent with the County's updated General Plan policies and land use designations. As part of the County's General Plan update, the project's previous General Plan designation of (21) Specific Plan was replaced with a mix of SR-2, SR-10, and RL-40 land use designations. More specifically, the General Plan update assigns the following designations to the project site:

- 194.5 acres at SR-2 designation (1 dwelling unit per 2 acres) = 97 units
- 236.6 acres at SR-10 designation (1 dwelling unit per 10 acres) = 23 units
- 251.5 acres at RL-40 designation (1 dwelling unit per 40 acres) = 6 units
- Total = 126 units (residential lots)

Based on this land use distribution, the total number of dwelling units allowed on the project site would be 126 units. Therefore, the 125-unit Cumming Ranch project is consistent with the residential densities that are permitted under the updated General Plan land use map, and the proposed residential lot areas are consistent with the project's proposed Specific Plan.

The Cumming Ranch project is also consistent with other components of the General Plan update, including the Conservation Subdivision program, which is mandated for subdivisions that are located in SR-10 and Rural Lands (RL-20 through RL-80). According to Section 81.401 (r) of the County's Subdivision Ordinance, subdivisions need to be located in areas that minimize impacts to environmental resources, and development needs to be consolidated to the maximum extent permitted by County regulations and the applicable Community Plan. The Cumming Ranch project accomplishes this by transferring density from the areas designated as SR-10 and RL-40. The Specific Plan designates the SR-10 and RL-40 areas as open space, and

places the proposed residential lots in the least environmentally sensitive areas (e.g., closer to Highland Valley Road, which is designated as SR-2).

Regional plans that are applicable to the Cumming Ranch SPA were reviewed for inconsistencies, and none were identified. The plans that were reviewed are as follows:

- County of San Diego General Plan
- Ramona Community Plan
- NCCP
- RWQCB Basin Plan
- Regional Air Quality Strategy
- Air Quality Management Plan
- State Implementation Plan
- Ramona Airport Land Use Compatibility Plan

A complete policy analysis is provided in Section 4.1.4 and Appendix M of this EIR.

1.6 List of Past, Present, and Reasonably Anticipated Future Projects in the Project Area

A list of past, present, and reasonably foreseeable projects is provided based on research of DPLU databases and in cooperation with DPLU staff. The Ramona Community Planning Area was included in the search for cumulative projects, and 90 projects were identified. Table 1-7 lists the projects and provides a brief summary of each. Figure 1-17 shows the general location of each project. This listing of projects provides the basis for the cumulative impact discussion provided for each issue area. Each issue area discussion defines the cumulative project area that is appropriate for the individual subject-based analysis, although, for many issue areas, it is important to look at the entire community area.

1.7 Growth-Inducing Effects

As required by CEQA, this EIR must discuss ways in which the project could foster economic or population growth, either directly or indirectly, in the surrounding area (CEQA Guidelines, Section 15126.2). A project can be determined to have a growth-inducing impact if it directly or indirectly causes economic or population expansion through the removal of obstacles to growth, actions that are sometimes referred to as "growth accommodating."

Ramona is the fastest-growing community in unincorporated San Diego County (RCC 2004). The total population of the Ramona Community Planning Area in 2000 was 33,404 persons. By 2030, this population is forecast to increase to 54,048 persons. This growth represents a 38% increase over the current population (SANDAG 2003). The County also projects significant growth in the Ramona area. In planning for the General Plan 2020 update, the forecasted number used for the Ramona community was 53,340 persons (County of San Diego 2007a).

The Ramona area averages approximately three persons per household (SANDAG 2003). The proposed project would create 125 new single-family homes. Based on the average Ramona household occupancy, it is anticipated that the project would accommodate approximately 375 persons. Thus, the proposed project would provide for additional direct growth within the Ramona Community Plan Area.

As part of the project, Areas B and C would be preserved as open space in conjunction with the Ramona Grasslands Preserve to the northwest. With the preservation of this land as open space, there is no potential for future growth on those parcels. This preserved open space creates a natural barrier to the potential conversion of the undeveloped lands to the north and northwest of the project. The undeveloped areas to the northwest are zoned for agricultural use and are generally considered to be main components of the Ramona Grasslands Preserve as envisioned by the County. Because the County envisions preservation of these parcels, the project is not expected to result in their development. The area located to the east of Areas B and C is part of the Ramona Town Center and is already developed. The project is not expected to result in more dense development of the Ramona Town Center because the Cumming Ranch project's density is similar to these adjacent land uses.

The areas surrounding the development proposed in Area A generally consist of residential development on a combination of smaller and larger lots with some undeveloped areas mixed in. The surrounding area is zoned as Agriculture except for the Ramona Airport and one other small parcel to the north, which are zoned Industrial (County of San Diego 2004c). The assemblage of the smaller lots is not likely because of economic factors. Therefore, it is anticipated that these smaller developed and undeveloped lots would not be converted to more dense land use with implementation of the Cumming Ranch project. Some of the infill lots are expected to be developed in the future, but this development would be expected with or without the implementation of the Cumming Ranch project. In addition, there are some larger lots that may be available for development in the immediate vicinity of the Cumming Ranch site. An example of this type of potential growth on a larger lot can be found in the List of Cumulative Projects (Project #68, Table 1-7). This project is located near the Cumming Ranch site (see Figure 1-17) and is a development of 35 acres into four single-family residential units. Other similar projects

in the Ramona area are already occurring based on the overall regional growth and the demand for housing. This type of growth is anticipated regardless of whether the Cumming Ranch project is implemented. Additional development on larger lots in the area would not be attributable to the Cumming Ranch project.

The proposed project would introduce 125 new housing units that would require offsite commercial services such as grocery stores, gas stations, and other services. It is anticipated that these needs would be fulfilled in the adjacent Ramona Town Center, which is the commercial center of the Ramona area. Ramona Town Center provides commercial services to the Ramona community and surrounding areas. The addition of 125 residential units to the community would create additional demand on the local business. However, this is 41 units less than what was planned in the former Ramona Community Plan. The increased business generated by the project is not anticipated to increase demand for new commercial services.

Daily commuter traffic associated with the proposed project would typically access the San Diego region to the southwest. Because the project is located to the west of Ramona Town Center, commuter traffic generated by the proposed project would not be required to pass though Ramona Town Center, as the majority of traffic would be traveling west toward the San Diego area. This would avoid adding additional peak-hour traffic to the Ramona Town Center area, which is congested during peak commuter hours.

The proposed Cumming Ranch project would extend infrastructure and public services to the project site. For sewer services, the project is located within the boundaries of the RMWD sphere of influence, but not within the Activated Sewer Powers Area or the Santa Maria Sewer Service Area. LAFCO approval of an expansion of the RMWD latent sewer power area to include the proposed project area is required. The project's eastern boundary and a portion of the northern boundary are contiguous with the Santa Maria Sewer Service Area. The SMWWTP is located within an insert along the project's eastern boundary. For water service, the project area is located within the existing water service area of the RMWD, and no annexation process through LAFCO would be required.

In conformance with California Government Code 56668, LAFCO considers 14 main points during the review process of a latent powers sewer expansion. These points take into consideration current and future population and population density (Section 4.1.5, Population and Housing), the need for organized community services (Section 3.6, Public Services and Recreation), the effect of the action on adjacent areas (Section 4.1.4, Land Use and Planning), efficient patterns of urban development (Section 4.1.4, Land Use and Planning), physical and economic integrity of agricultural lands (Section 4.1.3, Agricultural Resources), definiteness and

certainty of proposal boundaries and other matters affecting boundaries (Chapter 1, Project Description and Environmental Setting), consistency with the Regional Transportation Plan (Section 2.1, Transportation and Circulation), the sphere of influence (Section 3.6, Public Services and Recreation), comments of affected agencies (all comment letters included within this Final EIR), the availability of an entity to provide services (Section 3.6, Public Services and Recreation), the timely availability of water supply (Section 3.6, Public Services and Recreation), the ability to meet regional housing needs (Section 4.1.5, Population and Housing), information and comments from landowners and residents (all comment letters included within this Final EIR), existing land use designations (Section 4.1.4, Land Use and Planning), and environmental justice (environmental justice is not a CEQA issue and is not discussed in this document). These points are considered in various sections of this EIR analysis. While the project area is not located within the RMWD latent sewer power area, the project site is located adjacent to the existing SMWWTP. The proposed project is in conformance with the local planning documents regarding growth and development, and meets all other findings as required by LAFCO for approval.

One of LAFCO's goals is to "discourage premature conversion of prime agricultural and open space lands to urban uses." The majority of the project site is currently dry-farmed and grazed, but there are no lands designated as Prime Farmland, as discussed in Section 4.1.3. In addition, the site is located immediately west of the densely developed Ramona Town Center, and is also surrounded by rural residential development to the north, west, and south. The majority of the project site (67%) would remain as open space, and agricultural operations may continue on Area B and will be encouraged within individual lots. For these reasons, the project would not prematurely convert prime agricultural or open space land to urban use, and would be compatible with LAFCO's goal.

RMWD is in the process of planning and designing improvements and expansions of its water and wastewater service capacities, as detailed in Subchapter 3.6. Planned expansion of the existing water supply system would modify the Downtown Operational Storage Zone and would likely include a new reservoir, which would provide water to the project site and surrounding area. It is anticipated that the new reservoir would have a total of 3 million gallons and would consist of two above-ground storage tanks constructed in two phases, with the first phase being completed within the next 5 years. To improve and expand wastewater treatment capacities, RMWD as lead agency began the environmental process by filing a Notice of Preparation (NOP) to implement the planned systemwide expansion of the SMWWTP in December 2008. The proposed project is a three-phase expansion of the SMWWTP to 1.47 million gallons per day (MGD). The project would also provide improvements to the existing spray fields and holding ponds to increase efficiencies (RMWD 2008). In 2008, RMWD purchased a 285-acre portion of

Davis Ranch from The Nature Conservancy for use as spray fields. This land was formerly leased from the Davis Ranch.

As previously described, the project site is directly adjacent to the SMWWTP. A 4- to 6-inch-diameter main sewer line would be installed to convey project wastewater to the SMWWTP. A segment of the proposed main sewer line would extend through the southeastern portion of the Hardy Ranch property. However, this offsite infrastructure improvement would not induce growth, as Hardy Ranch was recently purchased by the County for conservation in the Ramona Grasslands Preserve, and development will not occur on this property. It is anticipated that the Spirit of Joy church project (listed as #10 in Table 1-7, List of Cumulative Projects) located adjacent to the Cumming Ranch project site would connect into the proposed sewer system. This connection has been coordinated between the two projects, as it is the most logical service solution with the least amount of future disturbance. However, if the Cumming Ranch project is not implemented, the church would need to pursue other options to facilitate planned development of the property. Development of the church property is considered infill development, and would be expected to occur with or without implementation of the Cumming Ranch project.

The proposed project would result in the direct growth of 125 residential units. The environmental impacts of this onsite growth are analyzed in Chapters 2.0 and 3.0 of this EIR. Additional growth beyond this project-specific development would not be induced by the project. Although some properties in the vicinity (e.g., the adjacent property east of the project site currently supporting rabbit farms) could conceivably be developed to denser land use in the future, this growth is not attributable to the proposed project; this growth would be expected to occur with or without the proposed project as a result of the regional demand for housing. For these reasons, implementation of the Cumming Ranch project would not result in secondary environmental effects related to additional growth beyond the proposed 125 residential units.

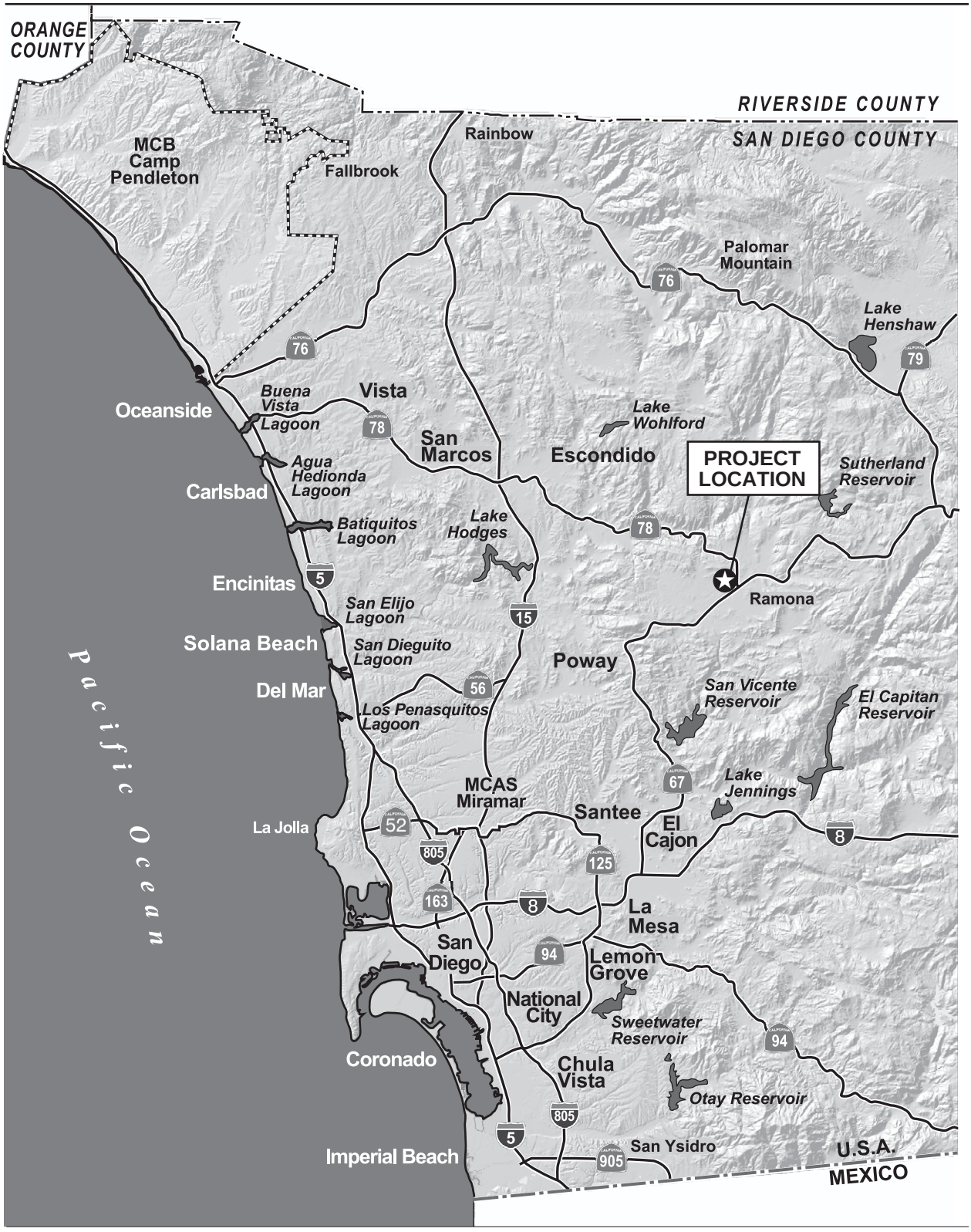
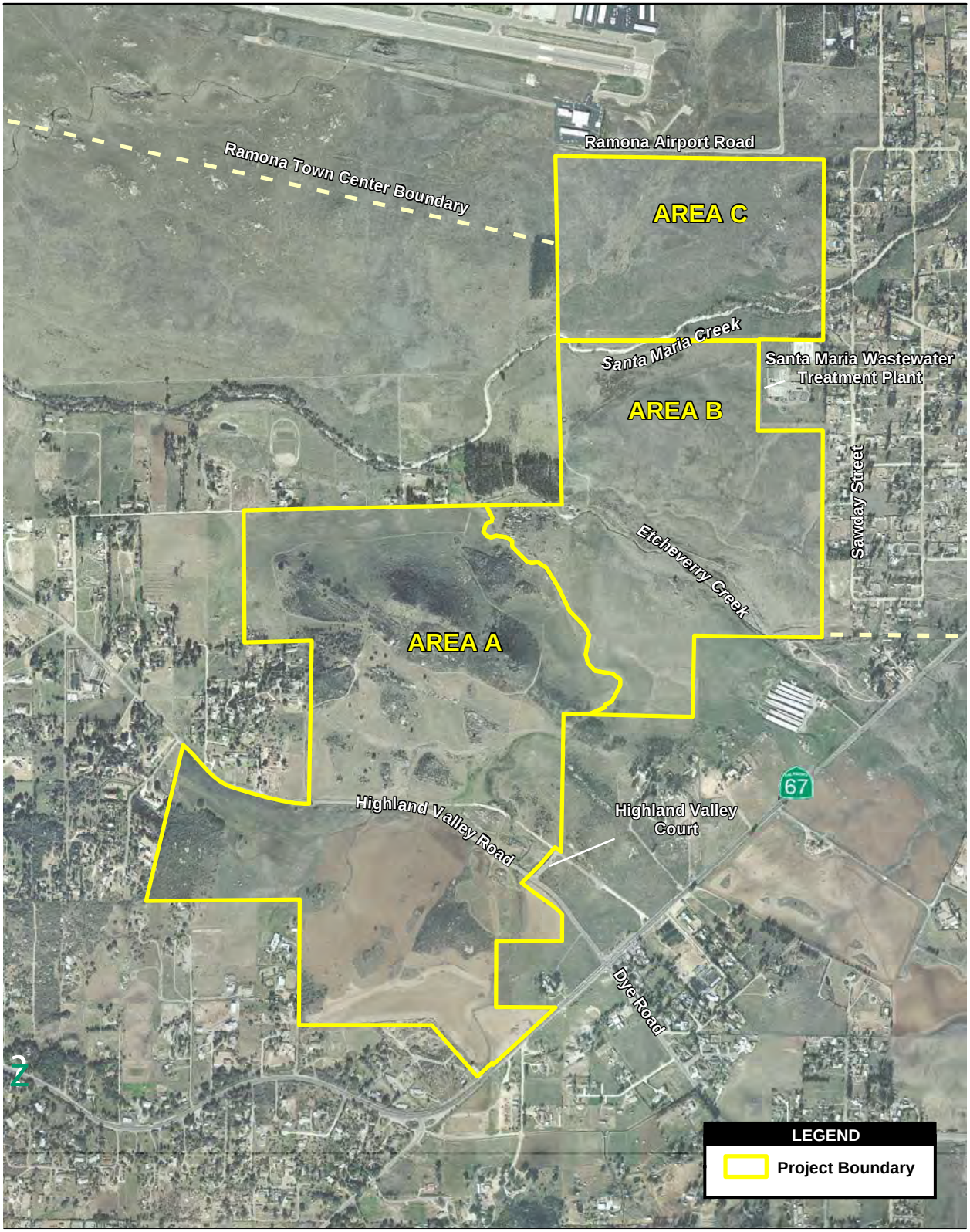


Figure 1-1
Regional Map



Source: AirPhotoUSA

1,500 750 0 1,500 Feet

Scale: 1:24,000; 1 inch = 2,000 feet

Figure 1-2
Project Vicinity Map

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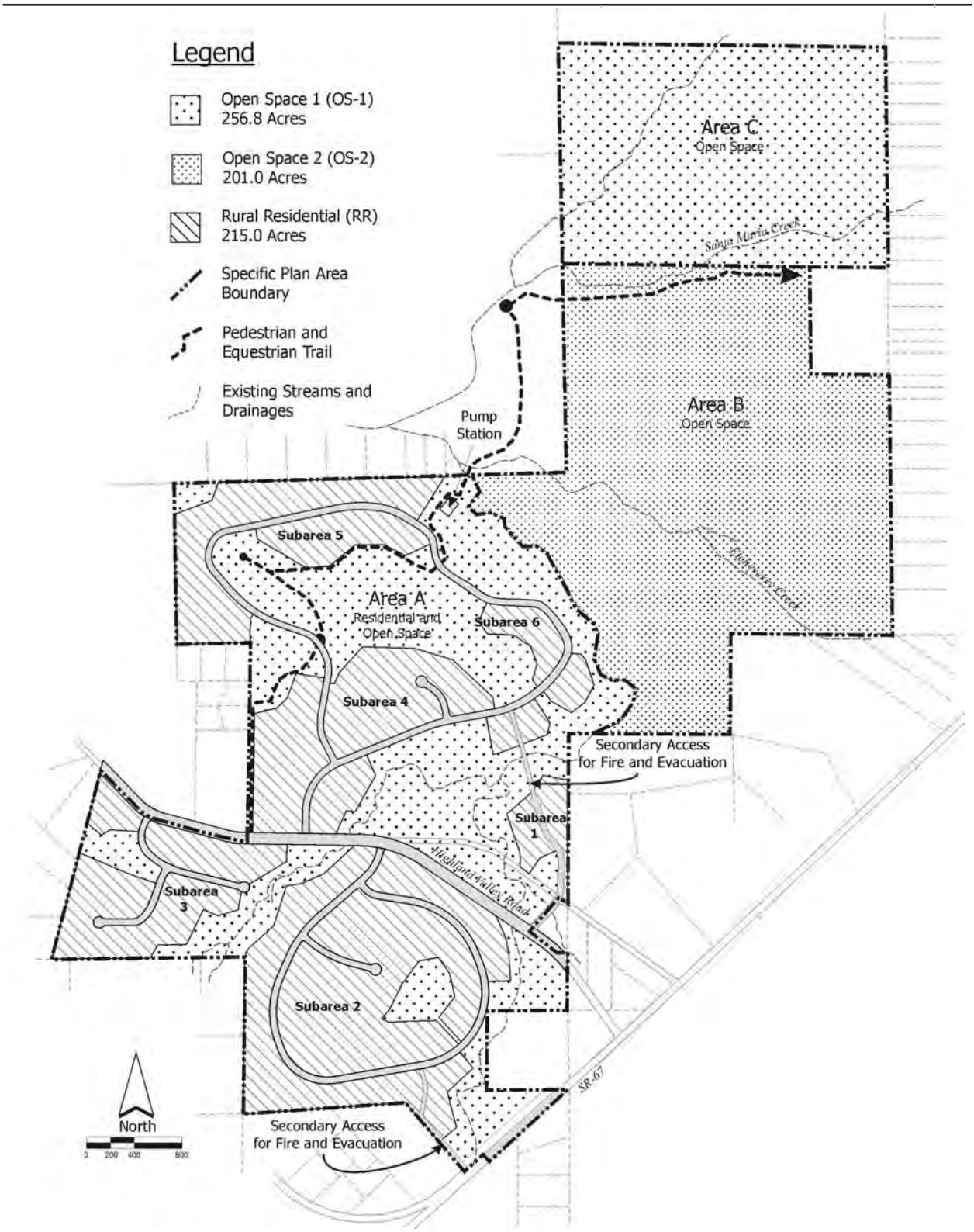
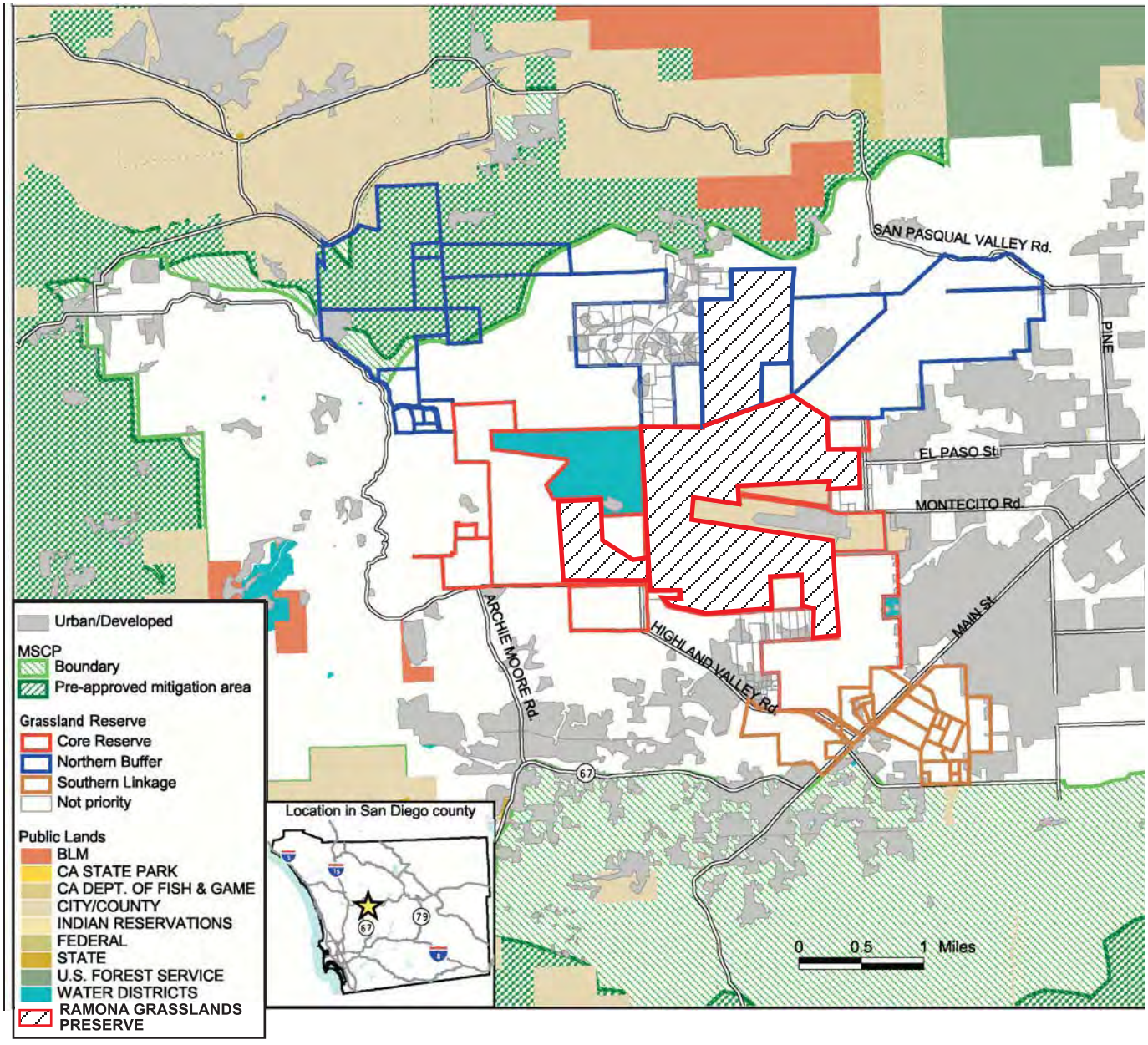


Figure 1-3
Land Use Plan



Source: The Nature Conservancy; County of San Diego Department of Parks and Recreation Area Specific Management Directives for Ramona Grasslands Preserve June 2007

NORTH

Figure 1-4
Ramona Grasslands Preserve General Boundaries

Source: HDR 2008

0 200 800 1600 Feet

NORTH

Figure 1-5
Conceptual Site Plan

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Source: Snipes Dye Associates 2012

LAND USE AREA CALCULATIONS *

AREA 'A' - RESIDENTIAL & OPEN SPACE

RESIDENTIAL LOTS	188.2 ACRES
RESIDENTIAL STREETS	24.3 ACRES
H.O.A. LOTS	2.1 ACRES
R.M.W.D. PUMP LOT	0.4 ACRES
TOTAL RESIDENTIAL	215.0 ACRES
OPEN SPACE **	143.7 ACRES
TOTAL AREA A	358.7 ACRES

AREA 'B' - OPEN SPACE

201.0 ACRES

AREA 'C' - OPEN SPACE

113.1 ACRES

SUB-TOTAL PROJECT AREA		672.8 ACRES
R.O.W. - STATE ROUTE 67		2.9 ACRES
R.O.W. - HIGHLAND VALLEY ROAD		6.9 ACRES
TOTAL PROJECT AREA		682.6 ACRES
TOTAL OPEN SPACE	(67.1%)	457.8 ACRES

* ALL ACREAGES ARE APPROXIMATIONS.

** DOES NOT INCLUDE ANY OPEN SPACE AREAS WITHIN RESIDENTIAL LOTS.

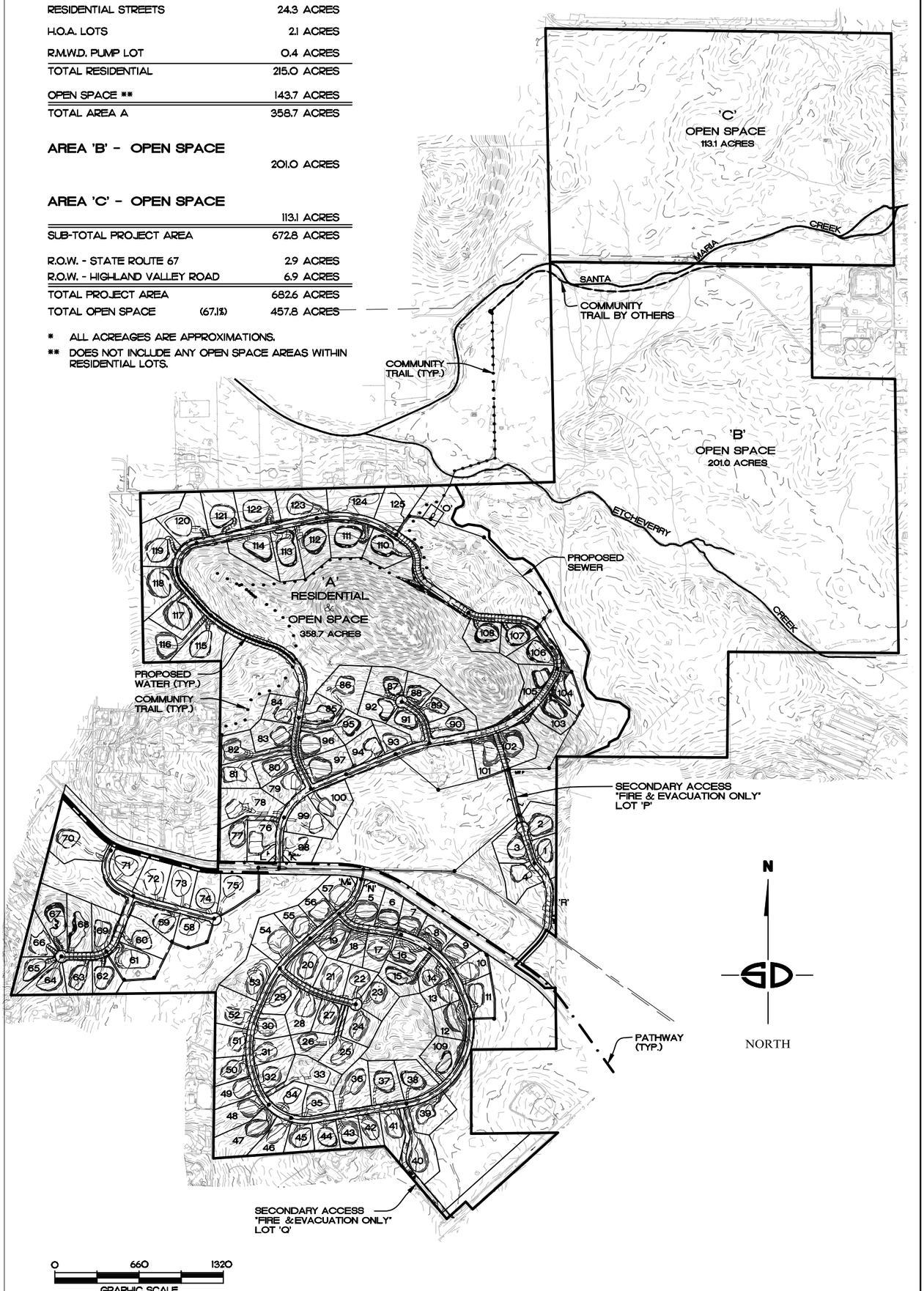

Figure 1-6
Tentative Map

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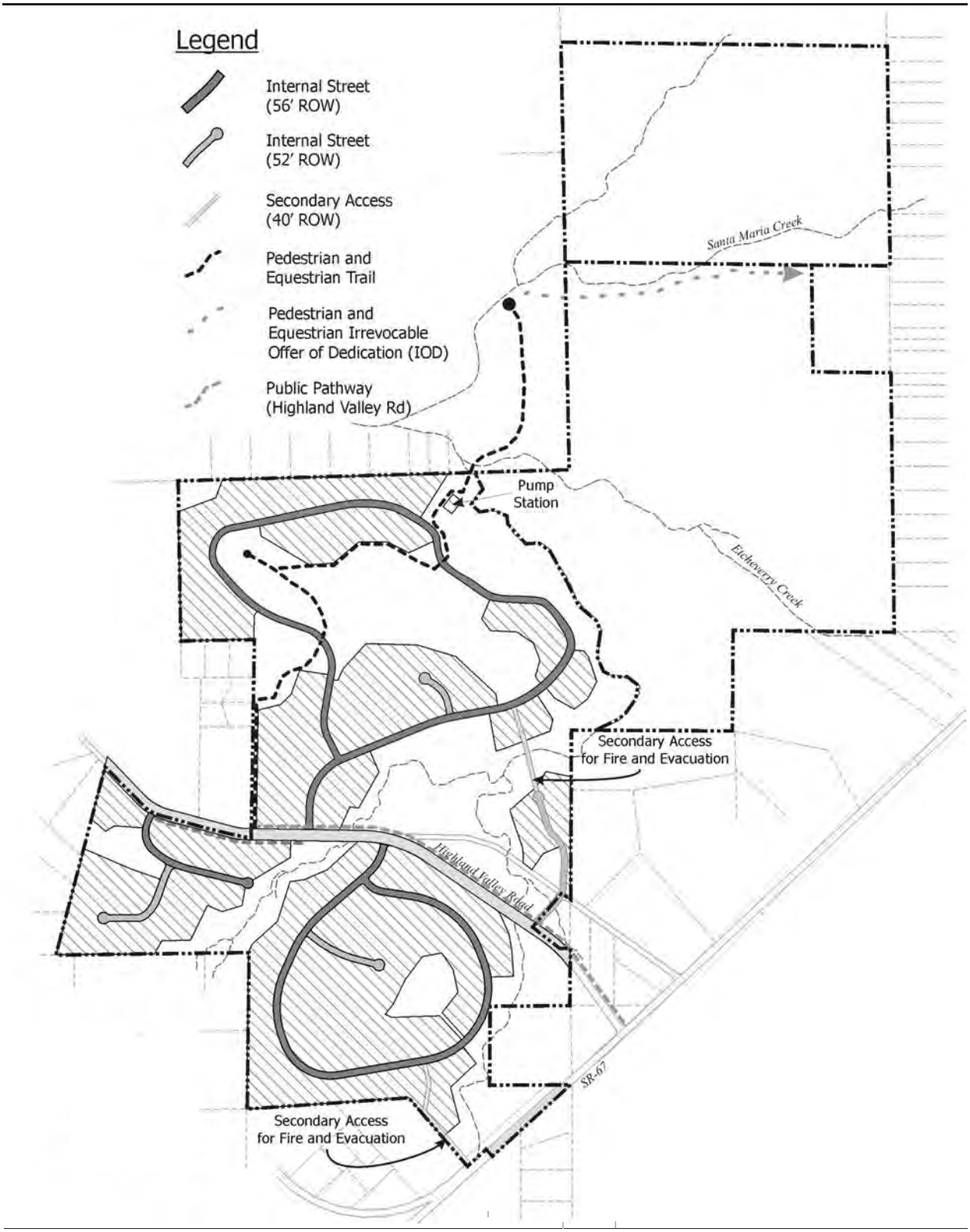

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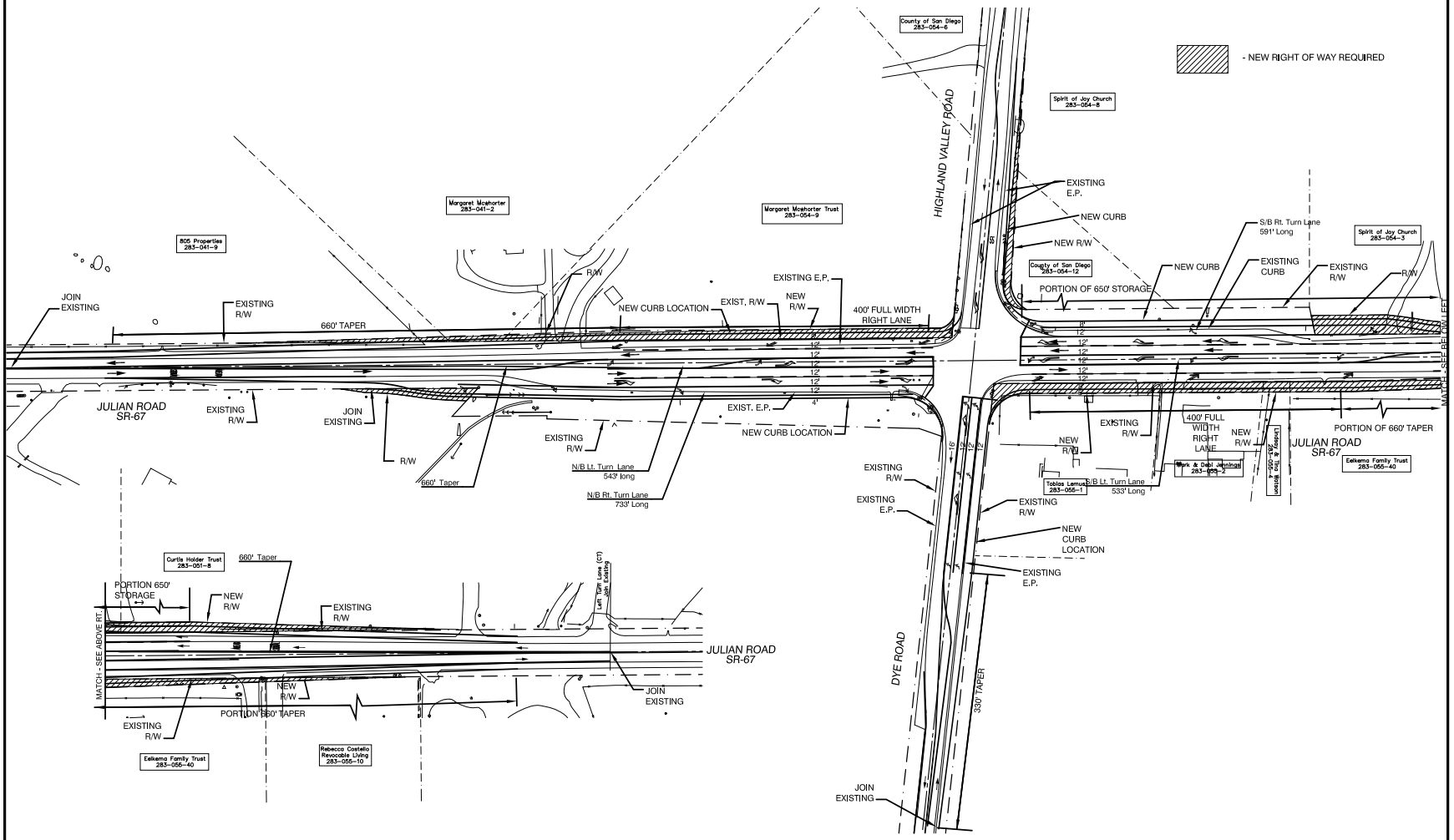
Figure 1-7
Internal Circulation Plan



Source: RCE Engineering

100 0 100 200 Feet

Scale: 1" = 200'

Figure 1-8
Roadway Improvements

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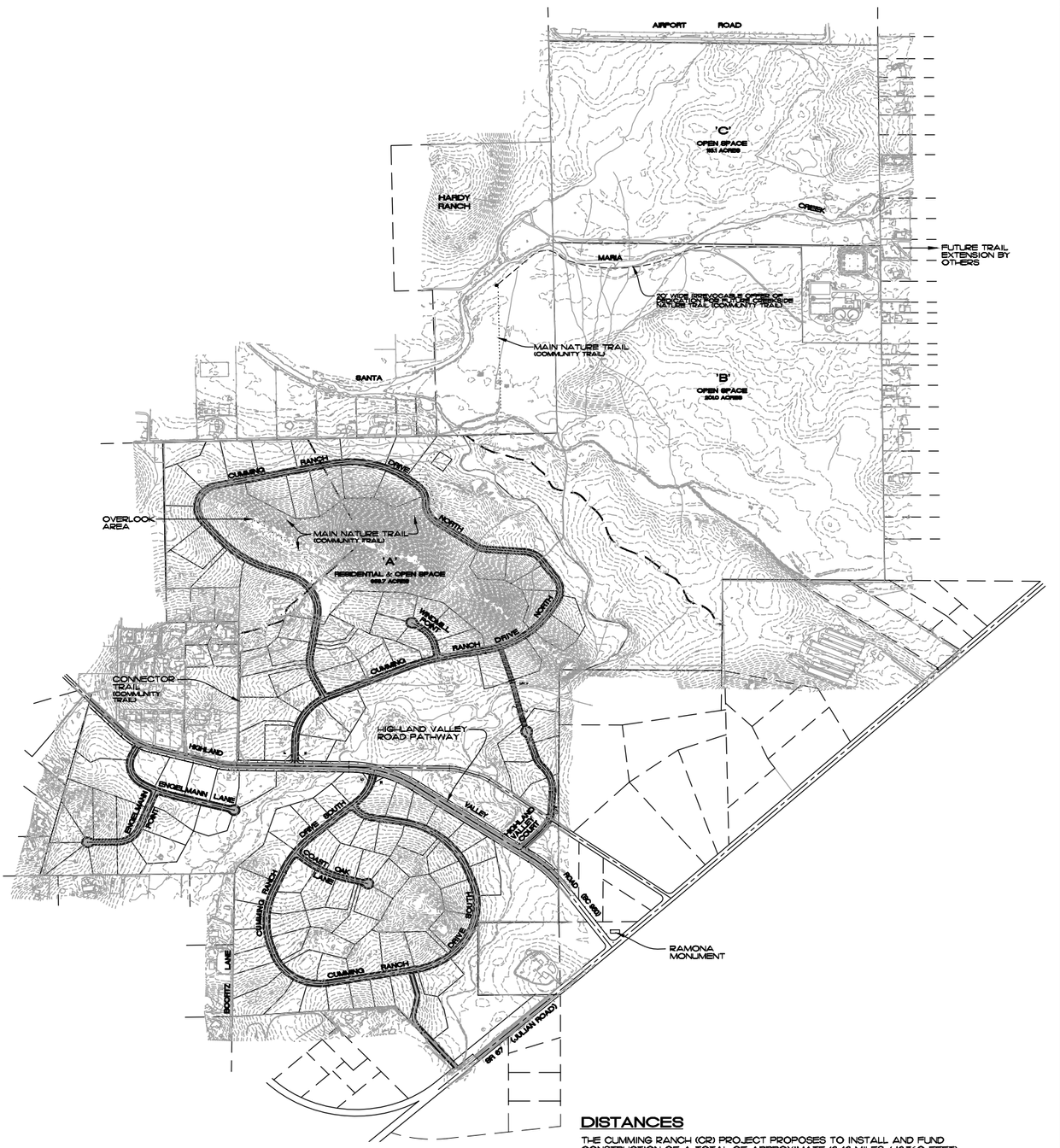

Source: Snipes Dye Associates 2006

DISTANCES

THE CUMMING RANCH (CR) PROJECT PROPOSES TO INSTALL AND FUND CONSTRUCTION OF A TOTAL OF APPROXIMATE (2.42 MILES / 12,760 FEET) OF COMMUNITY - LEVEL TRAILS AND PATHWAYS. DISTANCES WITHIN THE VARIOUS SEGMENTS OF THE PROPOSED SYSTEM ARE AS FOLLOWS:

HIGHLAND VALLEY ROAD PATHWAY (1.11 MILES / 5,850 FEET)

CR - AREA A -	0.89 MILES / 4,695 FEET
HIGHLAND VALLEY COURT -	0.02 MILES / 80 FEET
COUNTY PARCEL (ROW) -	0.06 MILES / 325 FEET
CHURCH PROPERTY -	0.14 MILES / 750 FEET

CONNECTOR TRAIL (0.35 MILES / 1,830 FEET)

CR -AREA A -	0.35 MILES / 1,830 FEET

MAIN NATURE TRAIL (0.96 MILES / 5,080 FEET)

CR - AREA A - (INCLUDING OVERLOOK AREA)	0.65 MILES / 3,430 FEET
HARDY RANCH - (PARKS & RECREATION)	0.31 MILES / 1,650 FEET

NOTE

1. APPROXIMATELY 3.65 MILES / 19,250 FEET OF SMALLER PATHWAYS ALONG INTERNAL STREETS OF PROJECT MAINLY FOR USE OF RESIDENTS WITHIN THE PROJECT, ARE NOT CALCULATED WITHIN THE COMMUNITY - LEVEL TRAILS AND PATHWAYS SYSTEM STATED ABOVE.
2. ETCHEVERRY CREEK CROSSING USES EXISTING ROAD AND CULVERT. SANTA MARIA CREEK USES A NATURAL CROSSING.
3. TRAIL CROSSING SIGNAGE WILL BE INSTALLED AT MAJOR STREET CROSSINGS.
4. METAL POSTS WILL BE INSTALLED AT MAJOR TRAIL ENTRANCES TO RESTRICT MOTORIZED VEHICLE ENTRY. POSTS CAN BE UNLOCKED AND REMOVED FOR PERIODS OF TRAIL MAINTENACE.

STANDARDS

HIGHLAND VALLEY ROAD PATHWAY

TYPE 'D' PATHWAY WITH A 12 FOOT TREAD WIDTH & OVERALL WIDTH OF 15-FEET. WOOD-RAIL FENCE ON BOTH SIDES, EXCEPT INNER FENCE NOT REQUIRED WHERE ADJACENT TO DESIGNATED OPEN SPACE.

CONNECTOR TRAIL

TYPE 'B' RURAL TRAIL WITH A 10 FOOT TREAD WIDTH. WOOD-RAIL FENCE ON BOTH SIDES WHEN ADJACENT TO PRIVATE PARCELS. TRAIL EASEMENT IS 15 FEET WIDE.

MAIN NATURE TRAIL

TYPE 'C' PRIMITIVE TRAIL WITH A 8 FOOT TREAD WIDTH, FENCING NOT REQUIRED. TRAIL EASEMENT IS 20 FEET WIDE.

CREEKSIDE NATURE TRAIL

20' WIDE IRREVOCABLE OFFER OF DEDICATION FOR FUTURE TRAIL, TO BE CONSTRUCTED BY OTHERS.

Figure 1-9
Community Trails and Pathways

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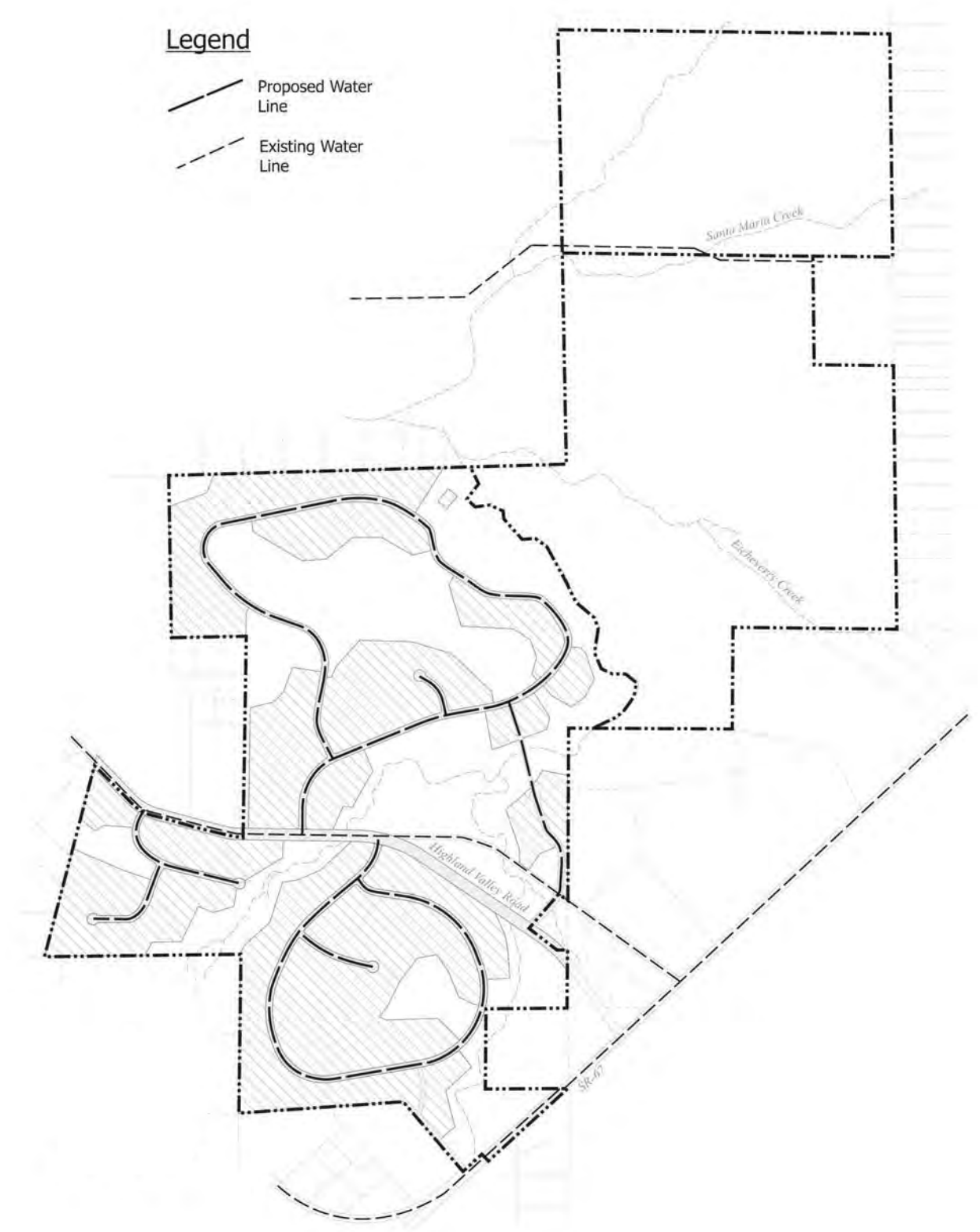


Figure 1-10
Proposed Water System

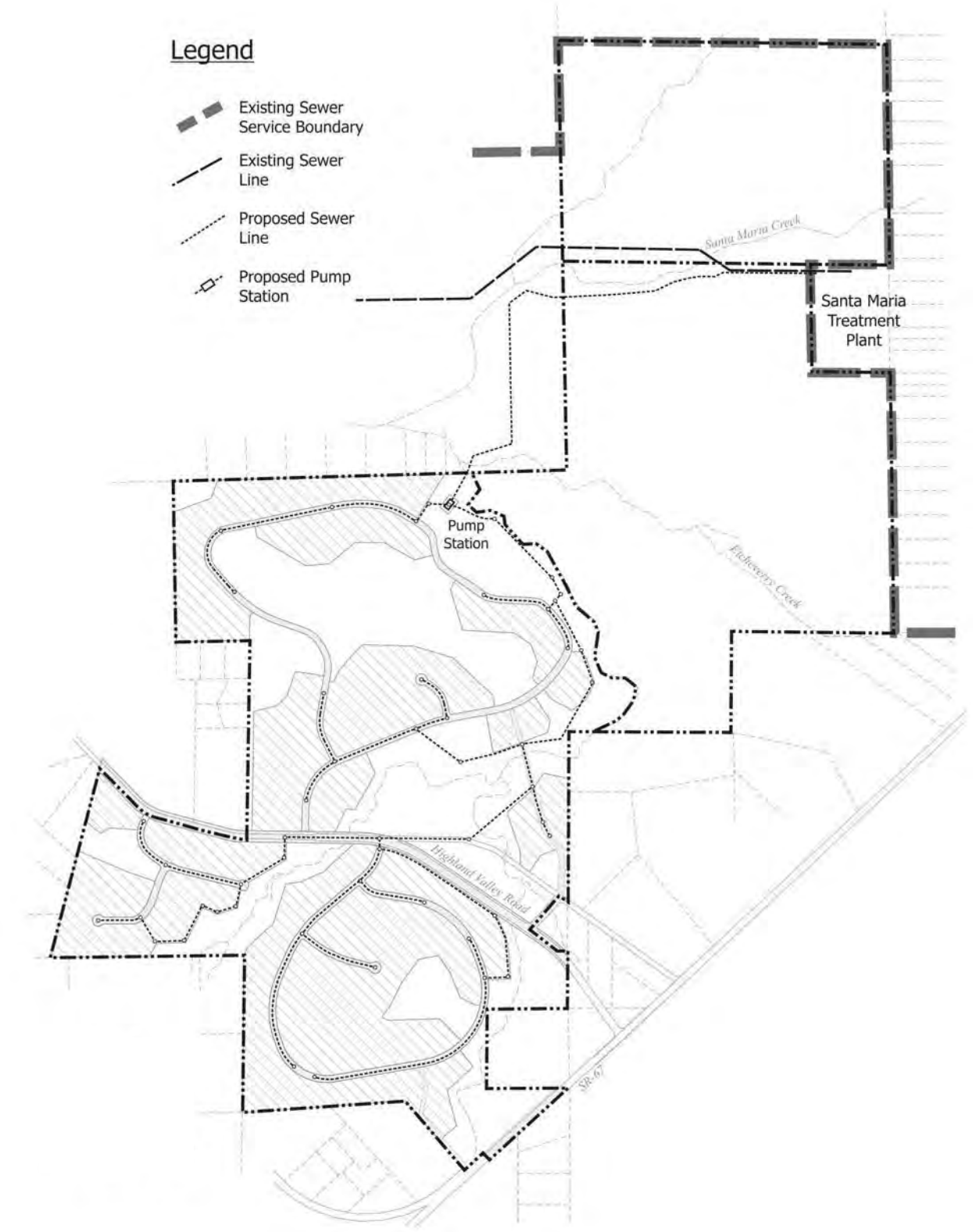
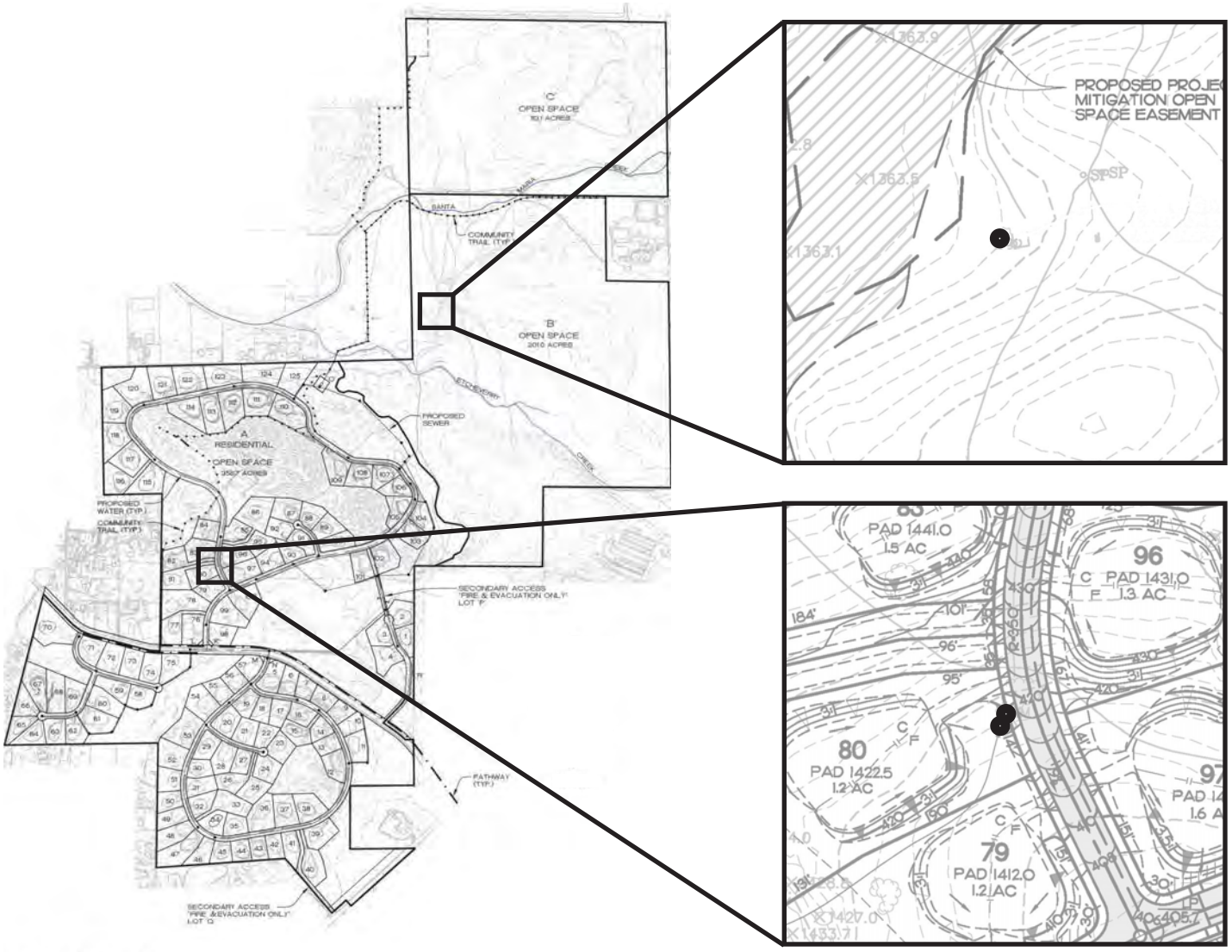


Figure 1-11
Proposed Sewer System



Well Number 2

Location:
Within Area B approximately 285 feet east of western property line.

Status:
To be legally destroyed by a licensed C-57 well driller, under permit and inspection by the County fo San Diego Department of Environmental Health.

Well Number 1
(Two Shafts)

Location: Within Area A on Lot 80, approximately 550 feet east of western property line.

Status:
To be legally destroyed by a licensed C-57 well driller, under permit and inspection by the County fo San Diego Department of Environmental Health.

0 660 1320 2640 Feet

Figure 1-12
Location and Status of Existing Wells

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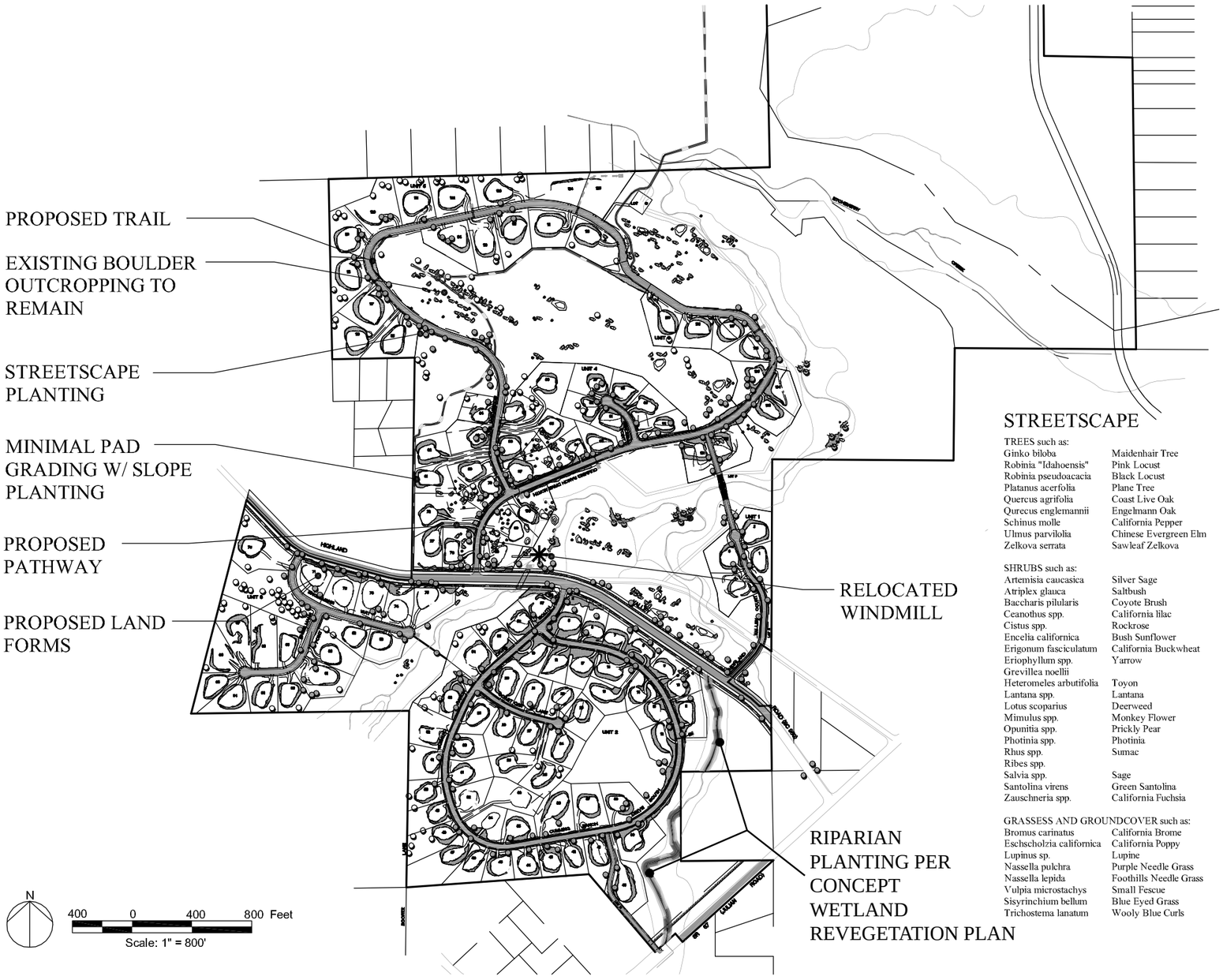

STREETSCAPE

TREES such as:	
Ginko biloba	Maidenhair Tree
Robinia "Idahoensis"	Pink Locust
Robinia pseudoacacia	Black Locust
Platanus acerfolia	Plane Tree
Quercus agrifolia	Coast Live Oak
Qurecus englemannii	Engelmann Oak
Schinus molle	California Pepper
Ulmus parvilolia	Chinese Evergreen Elm
Zelkova serrata	Sawleaf Zelkova
SHRUBS such as:	
Artemisia caucasica	Silver Sage
Atriplex glauca	Saltbush
Baccharis pilularis	Coyote Brush
Ceanothus spp.	California lilac
Cistus spp.	Rockrose
Encelia californica	Bush Sunflower
Erigonum fasciculatum	California Buckwheat
Eriophyllum spp.	Yarrow
Grevillea noellii	
Heteromeles arbutifolia	Toyon
Lantana spp.	Lantana
Lotus scoparius	Deerweed
Mimulus spp.	Monkey Flower
Opunitia spp.	Prickly Pear
Photinia spp.	Photinia
Rhus spp.	Sumac
Ribes spp.	
Salvia spp.	Sage
Santolina virens	Green Santolina
Zauschneria spp.	California Fuchsia
GRASSESS AND GROUNDCOVER such as:	
Bromus carinatus	California Brome
Eschscholzia californica	California Poppy
Lupinus sp.	Lupine
Nassella pulchra	Purple Needle Grass
Nassella lepida	Foothills Needle Grass
Vulpia microstachys	Small Fescue
Sisyrinchium bellum	Blue Eyed Grass
Trichostema lanatum	Wooly Blue Curls

ADJACENT TO OPEN SPACE

TREES such as:	
Platanus racemosa	California sycamore
Prunus ilicifolia	Hollyleaf Cherry
Quercus agrifolia	Coast Live OaK
Quercus dumosa	Scrub Oak
Qurecus englemannii	Engelmann Oak
SHRUBS such as:	
Artemisia californica	California Sagebrush
Arctostaphylos spp.	Manzanita
Atriplex spp.	Saltbush
Baccharis pilularis	Coyote Brush
Ceanothus "concha"	Ceanothus
Cotoneaster spp.	Cotoneaster
Encelia californica	Bush Sunflower
Erigonum fasciculatum	California Buckwheat
Eriophyllum confertiflorum	Golden Yarrow
Lotus scoparius	Deerweed
Heteromeles arbutifolia	Toyon
Opuntia spp.	Beavertail
Rhus spp.	Sumac
Ribes spp.	Gooseberry or Currant
Salvia spp.	Salvia
Yucca spp.	Yucca
GRASSESS AND GROUNDCOVER such as:	
Avena barbata	Slender Wild Oat
Bromus carinatus	California Brome
Eschscholzia californiaca	California Poppy
Festuca spp.	Festuca
Hordeum	
Lupinus spp.	Lupine
Melica spp.	Melic
Nassella pulchra	Purple Needle Grass
Nassella lepida	Foothills Needle Grass
Vulpia microstachys	Small Fescue

PROHIBITED PLANTS (Prohibited plants shall also include those listed by the California Invasive Plant Council)

Trees and shrubs	
Ailanthus altissima	Tree of Heaven
Arundo donax	Giant Reed
Atriplex semibaccata	Australian Saltbush
Brassica spp.	Schefflera
Broussonetia papyrifera	Paper Mulberry
Cedrus deodrora	Deodar Cedar
Cortaderia selloana	Pampas Grass
Cynara cardunclus	Cardon
Cynara skolymus	Thistle
Foeniculum vulgare	Common Fennel
Juniperus spp.	Juniper
Melilotus spp.	Sweetclover
Nicotiana glauca	Tree Tobacco
Pennisetum setaceum	Fountain Grass
Picris echidodeso	NCN
Pinus spp.	Pine
Rhynchelytrum repens	NCN
Ricinus communis	Castor Bean
Salsola salina	Russian Thistle
Spartium junceum	Spanish Broom
Stipa tenuissima	Mexican Feather Grass
Tamarix spp.	Tamarisk
Xanthium strumarium	Common Cocklebur
Nerium oleander	Oleander
Acer rubrum	Red Maple and hybrids
Prunus genus	Cherry
Taxus genus	Yew
Robinia pseudo-acacia	Black Locust

Source: Revegetation Plan

Figure 1-13
Landscape Concept and Revegetation

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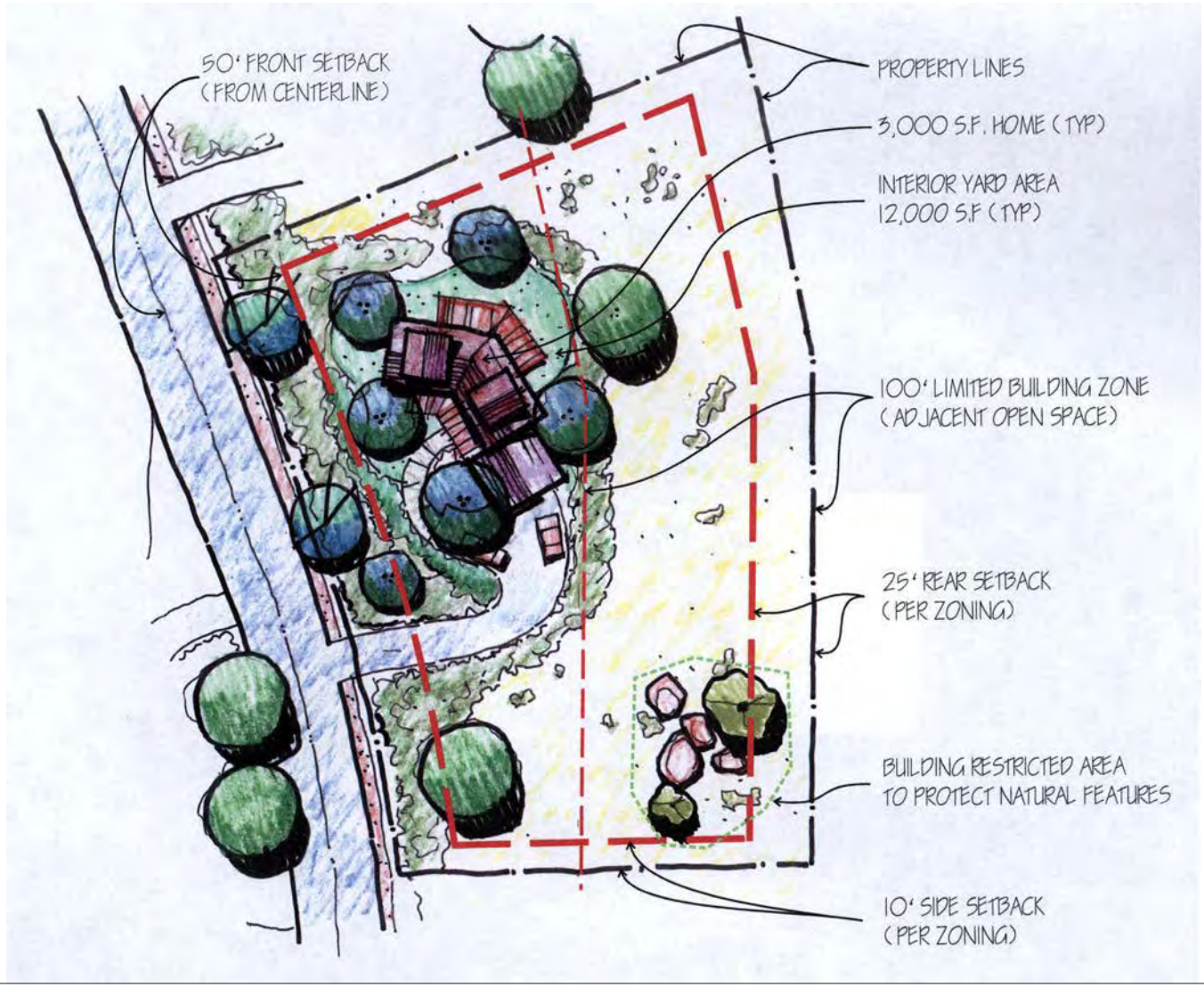
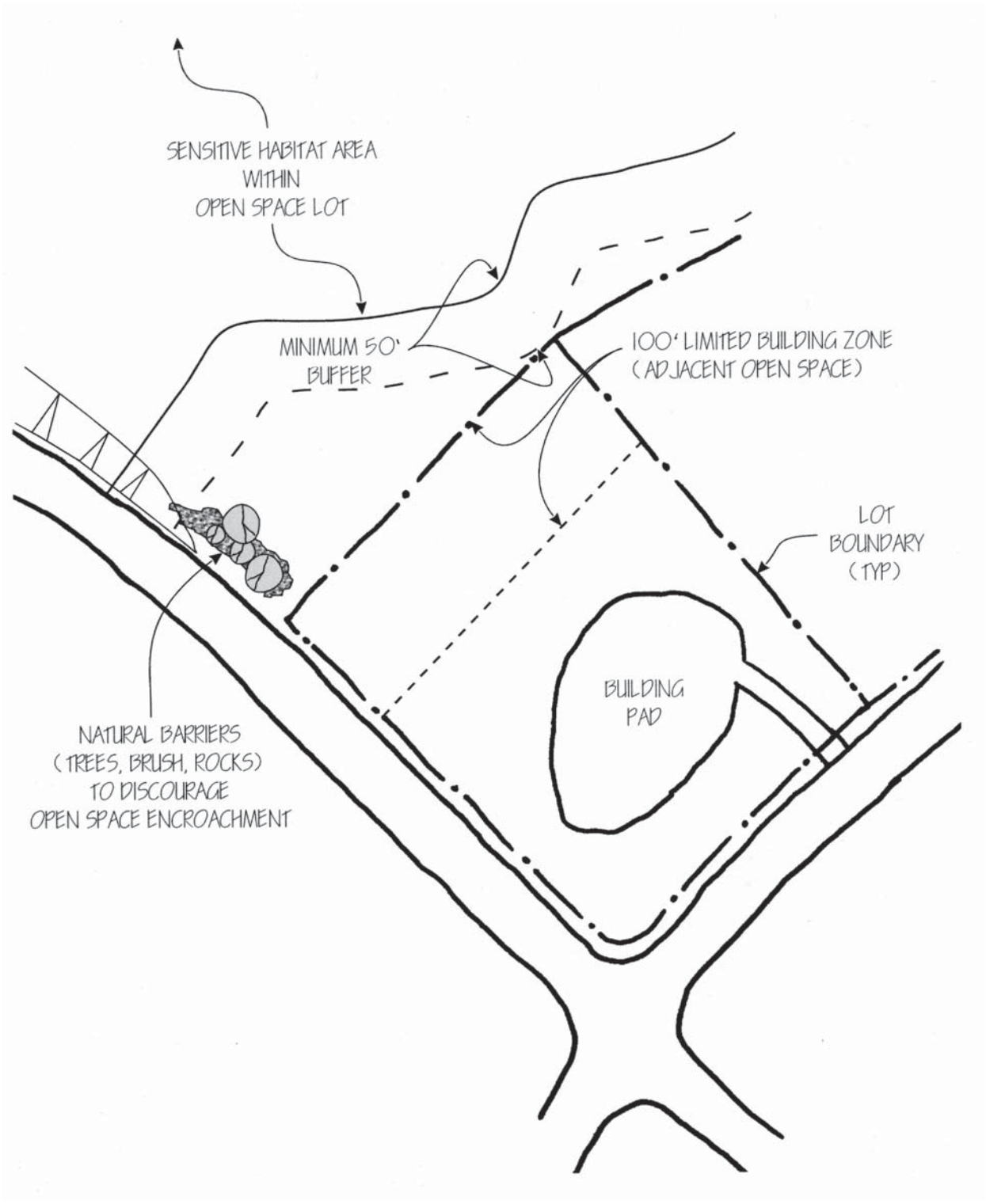
P:\2008\08080045 Cumming Ranch\6Graphics\Figures\4th Iteration EIR\Figure 1-14 TypicalLandscp.ai dbrady 10/21/10



NORTH

NOT TO SCALE

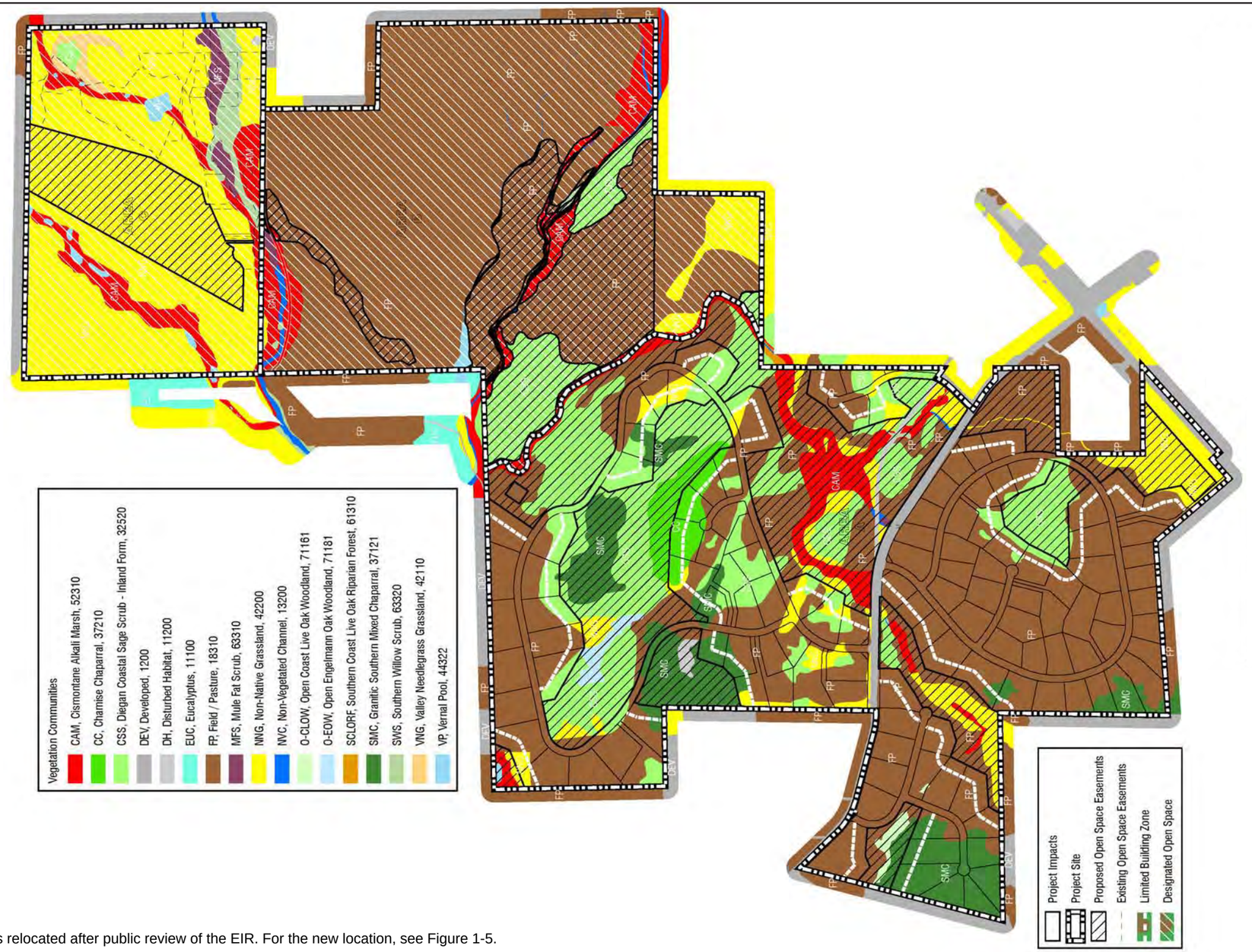
Figure 1-14
Typical Lot Landscaping



NORTH

No Scale

Figure 1-15
Setbacks and Buffers



	Proposed Mitigation	
Area	Required Mitigation	Proposed Easement
A	67.19	143.70
B	55.18	62.50
C	38.41	38.41
Totals	160.78	244.61

Note: Lot 109 was relocated after public review of the EIR. For the new location, see Figure 1-5.

Source: HDR 2008

0 200 800 1600 Feet

Figure 1-16
Open Space Easements

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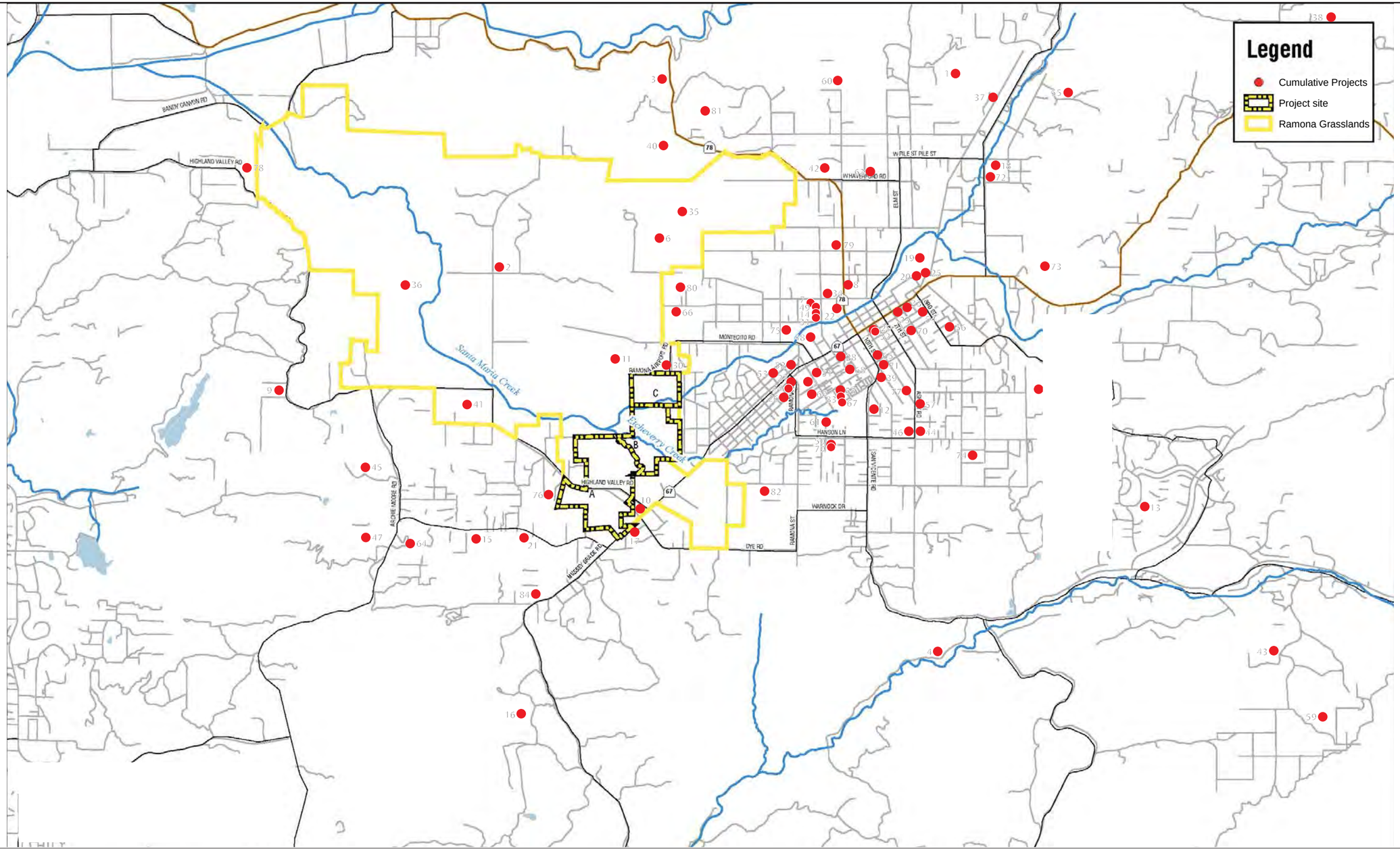

Source: HDR 2008

0 0.5 1 2 Miles

Approximate Scale

NORTH

Figure 1-17
Generalized Locations of Cumulative Projects

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Table 1-1
Development Summary Table

Project Component	Dwelling Units	Acreage	Average Lot Size (acres)	Density (dwelling units per acre)
Area A				
Residential Lots	125	188.2	1.5	0.66
Internal Streets	0	24.3	NA	NA
HOA Lots	0	2.1	NA	NA
Open Space Lots	0	143.7	NA	NA
RMWD Lift Station Lot	0	0.4	NA	NA
Total Area A	**125**	**358.7**	**1.5**	**0.35**
Area B	0	201.0	NA	NA
Area C	0	113.1	NA	NA
OTHER				
Right-of-Way – SR 67	0	2.9	NA	NA
Right-of-Way – Highland Valley Road	0	6.9	NA	NA
TOTAL PROJECT AREA	**125**	**682.6**	**1.5**	**0.18**

Note: NA=Not Applicable

Table 1-2
Summary of Land Use Types and Totals

Land Use Type	Acreage	Percent of Project
Rural Residential	215.0	32%
Open Space	457.8	67%
Other (Right-of-Way)	9.8	1%
Project Total	**682.6**	**100%**

Table 1-3
Summary of Community-Level Trails and Pathways Distances[1]

HIGHLAND VALLEY ROAD PATHWAY		
Area A	0.89 mile	4,695 feet
Highland Valley Court	0.02 mile	80 feet
County Parcel (ROW)	0.06 mile	325 feet
Church Property	0.14 mile	750 feet
Total	**1.11 miles**	**5,850 feet**
MAIN NATURE TRAIL		
Area A	0.65 mile	3,430 feet
Hardy Ranch	0.0.31 mile	1,670 feet
Total	**0.96 miles**	**5,100 feet**
CONNECTOR TRAIL		
Area A	0.35 mile	1,830 feet
Total	**0.35 mile**	**1,830 feet**
ROW only – Area B	0.38 mile	2,000 feet
Total (trail construction)	**2.42 miles**	

[1] Approximately 3.65 miles/19,250 feet of smaller pathways along internal streets of the project, mainly for use by residents within the project, are not calculated within the community-level trails and pathways system.

Table 1-4
Assumed Project Implementation Timeline

Task	Duration
Entitlements	6 months
Final Engineering	9 months
Initial Site Construction	3 months
Ongoing Site Construction and Home Construction	36 to 60 months
Project Completion	–

Table 1-5
List of Approvals/Permits

Approval/Permit	Agency
Specific Plan (Specific Plan 03-005)	County of San Diego
Tentative Map (TM 5344)	County of San Diego
Rezone (R 07-002)	County of San Diego
Site Plan (STP 10-007)	County of San Diego
Minor Use Permit (lift station)	County of San Diego
Landscape Plans	County of San Diego
Clearing and Grading Permit	County of San Diego
Storm Water Management Plan	County of San Diego
County Right-of-Way Permits	County of San Diego
Habitat Loss Permit	County of San Diego
1602 Streambed Alteration Agreement	California Department of Fish and Game
401 Water Quality Certification	Regional Water Quality Control Board
404 Permit	U.S. Army Corps of Engineers
State Highway Encroachment Permit	California Department of Transportation
Expansion of RMWD Latent Power Service Area	Local Agency Formation Commission
Water District Approval	Ramona Municipal Water District
Sewer District Approval	Ramona Municipal Water District
Determination of Consistency	Federal Aviation Administration

Table 1-6
Project Design Features

Resource Area	Design Features	Design Results
Transportation and Circulation	• Highland Valley Road in the project area would be widened to meet County Mobility Element Standards • Improvements made at the SR 67 and Highland Valley Road intersection	Widening of Highland Valley road would allow for bike lanes and community pathways. Improved traffic conditions at SR 67 and Highland Valley Road intersection, thus improving traffic flow on surrounding roadways.
Noise	• The Site Plan/Use Permit would require noise-control façade to be placed around sewer lift station	Noise generated by the sewer lift station minimized through the use of a noise abating façade.
Biological Resources	• Maintain existing stands of oak trees • Preserve major ridgelines and rock outcroppings • Preserve Area B and C acreage (314.1 acres) and open space throughout Area A (143.7 acres) for inclusion in Ramona Grasslands Preserve • Protect all vernal pools • Preconstruction survey of trails • No mass grading	Large acreage available for inclusion in the Ramona Grasslands Preserve to form the basis of a cohesive biological eco-region along with other properties recently purchased for preservation. Wildlife linkages onsite and extending to adjacent open space maintained. Enhancement of drainages would provide

Resource Area	Design Features	Design Results
	• Maintain natural vegetation to extent feasible • Avoid development of Santa Maria and Etcheverry Creeks and drainages through the site • Minimal fencing to maintain wildlife movement • Native landscaping palette • Physical separation of development from open areas with buffers and natural barriers • Open space signage posted every 50 feet • Minimal lighting • Habitat enhancement along drainage corridors • Biological education for homeowners • Prohibit animal keeping without effective restraints or fencing; prohibit lighting, exotic invasive landscaping, and focal use areas, including arenas, pools, and patios through LBZ easement restrictions	additional cover and habitat for wildlife use and movement. Physical separation by distance would eliminate need for extensive fencing or walls, thus maintaining wildlife movement ability. Natural vegetation maintained to full extent feasible and enhanced by native landscape palette with no invasive species. Minimal lighting and natural buffers would reduce edge effects. Preservation of entire Area C would provide additional protective buffer area for vernal pools and enhance the Ramona Vernal Pool Preserve. Large areas of open space would allow for natural vegetation communities and plant populations, including Englemann oaks, to be mitigated onsite. LBZ restrictions would ease transition from private use space to open space.
Cultural Resources	• Project design avoids most known significant cultural resources on the project site • Avoidance of features typically associated with cultural resources, such as rock outcroppings	Most known cultural resources would be undisturbed and preserved in open space.
Public Services and Recreation	• Designed for sewer service, not septic system • Designed for public water service, not wells • Provide a public trail/pathway system of approximately 3.4 miles • Trails designed to operate independently yet connect into regional trail system • Trails designed to provide connections for community use • Large-lot design allows for recreation within private lots	All homes would be serviced through public water and sewer, and there would be no reliance on wells or septic systems. Project would create a trail system for the Ramona community throughout the property that could operate independently in the immediate term, but would also be compatible with future regional trail plans. Trail alignment designed to showcase the natural aesthetic quality of the area and provide easy access for pedestrian and equine use.
Hazards and Hazardous Materials	• LBZ of 100 feet in width measured from any lot line to an open space area where only noncombustible structures would be allowed and plants that burn easily would be prohibited • Project development would include fuel management zone and plant palette as defined in the Fire Protection Plan	Large LBZ and associated plant palette would provide natural fire protection, increased open space and rural character, and aesthetic value. LBZ and other buffer requirements create large distances between development and open space areas, reducing edge effects.
Aesthetics and Visual Quality	• Maintain natural landforms and unique features • Integrate existing topography into project design • Maintain existing natural landscaping in place • Create natural landscape palette • Minimal fencing, no chain-link or similar • Minimal lighting • No entry gates or large signage • Natural facades and low profile for lift station	Project would have smooth transition with adjacent grasslands and open space. Rural ambience would be maintained though large lots and open space. Natural landscaping, appropriate lots sizes, and open space would blend with existing community. Development “fits into” terrain rather than modifies it.

Resource Area	Design Features	Design Results
Air Quality	The grading plans shall specify the following: • Minimal grading of project site; no mass grading • Graded areas would be watered a minimum of three times daily • Install odor-control devices on lift station • Minimize land disturbance • Stabilize graded areas as quickly as possible to minimize fugitive dust • Apply chemical stabilizer or pave the last 100 feet of internal travel path within the construction site prior to public road entry • Install wheel washers adjacent to a paved apron prior to vehicle entry onto public roads • Remove any visible track-out into traveled public streets within 30 minutes of occurrence • Wet wash the construction access point at the end of each workday if any vehicle travel on unpaved surfaces occurred • Provide sufficient perimeter erosion control to prevent washout of silty material onto public roads • Cover haul trucks or maintain at least 12 inches of freeboard to reduce blow-off during hauling • Suspend all soil disturbance and travel on unpaved surfaces if winds exceed 25 miles per hour • Cover/water onsite stockpiles of excavated material • Hydroseed, landscape, or develop disturbed areas as quickly as possible and as directed by the County to reduce dust generation • Enforce a 15-miles-per-hour speed limit on unpaved surfaces	Use of minimal grading techniques would reduce the amount of fugitive dust released into the air during construction. Watering would minimize dust generation from graded areas. Other measures would minimize creation of fugitive dust during construction activities.
Hydrology and Water Quality	• Avoid onsite natural drainages and streams • No mass grading • Leave natural landscaping in place • No development on steep slopes • No wells or groundwater use • No septic systems • Large pervious areas preserved throughout site	Encroachment into wetland areas would be minimized. Reduced erosion potential and need for erosion control and natural biofilters for storm water throughout site. No potential for groundwater contamination from septic system or depletion of groundwater from well use.
Soils and Geology	• No development on steep slopes • Minimal grading of project site; no mass grading • Natural landscaping left in place • Geotechnical engineer would selectively test fill during site preparation and review any unusual or unexpected conditions and recommend measures, if necessary • During site preparation, soil removal would include existing colluvium, alluvium, older alluvium, and highly weathered bedrock; exposed surface would be reprocessed prior to the addition of fill • If soil imports are required, samples of the soil	Integrity of soils and underlying formations would be maintained through avoidance of steep slope development. Minimal grading techniques would allow for large quantities of soil to remain undisturbed and stable.

Resource Area	Design Features	Design Results
	would be evaluated by a geotechnical engineer to ensure compatibility with onsite soils and the recommendations of the geotechnical report • Remedial earthwork, including lot capping and cut/fill transitions, would be implemented with further evaluation of conditions in the field as grading occurs • An erosion-control fabric, or similar protective system, would be placed over graded slope faces to minimize erosion of the slope face until a suitable vegetation cover is established • All cut slopes would be mapped by the project engineering geologist during grading to allow amendments to mitigation as necessary • Additional or alternative measures may be required by the County engineer to ensure that soils are appropriately engineered and stabilized prior to development	
Land Use and Planning	• Large lot sizes • Lots sized to match surrounding developments • Residential use as designed in SPA for the site • Animal keeping allowed • Minimal grading to maintain natural topography • Trails designed per community desires • Minimal fencing, lighting, and signage • 67% of site preserved as open space • Aviation Easement Dedications and Overflight Easement Dedications would be placed over areas for airspace protection	Project would be consistent with the goals and policies of the Ramona Community Plan. Project would blend with surrounding communities and open space areas. Rural ambience of the community would be maintained. Trail system would be compatible with other regional trail planning efforts.

Table 1-7
List of Cumulative Projects

Number	Case #	Project Name	Location	Available Description
1	AP 03-065	Bluebird Vineyard	1105 Ash Street	Agricultural clearing of 7.61-acre site. Notice of violation filed.
2	AP 06-060	Westphal Agricultural Storage Project	18421 Rangeland Road	Oversized arena with an attached barn.
3	AP 07-041	Ramona 57 Acres	No address available	Administrative permit to encroach into an open space easement. The project consists of a 0.5696-acre encroachment into a 2.2040-acre biological open space easement.
4	MUP 02-005	Rancho Canada	22155 San Vicente Road	Project to convert historically refurbished ranch buildings (circa 1936) into a five-unit bed and breakfast as an "eco/agri-tourism" destination on the 4,200-acre Monte Vista Ranch. Only minimum grading and landscaping required. A Mitigated Negative Declaration was prepared and filed. Completed in 2004.
5	MUP 02-028	Elliot	988 Laky Lane	21.6 acres proposed for subdivision of 62 lots for single-family residential and retail/commercial development. RPO wetland traverses property from east to west.
6	MUP 03-035	Mountain Valley Ranch	1080 Montecito Way	Equestrian center with open space for arenas; parking; agriculture (pumpkins); a variety of sheds, barns, and animal pens; and two houses. Improvements include expansion of one existing house and addition of a game room, concession stand, swimming pool, riding arena, hay shed, new barn, and new animal pens.
7	MUP 03-094	RBS Towing and Storage	1148 Olive Street	Construction and operation of a towing yard, shops, and offices on a 1.75-acre parcel with an existing single-family dwelling and accessory building. Project included parking development, grading to fill a portion of the storage yard, and a grassy swale along the southerly property line to slow runoff to the southerly neighbor. The project was developed in two phases and is exempt from CEQA documentation. Completed in 2006.
8	MUP 04-052	Templo Monte Sinai	855 Olive Street	Project includes two church buildings totaling 15,410 square feet on a 4-acre site.
9	MUP 06-001	Immaculate Heart of Mary Catholic Community Church	1905 San Vicente Road	Relocating church to a 23-acre site. The project will include a church for seating of up to 1,500 persons, parish center, meeting rooms, administrative offices, a pre-K through 8th grade school, daycare facility, rectory, and support buildings.
10	MUP 08-017	Spirit of Joy Lutheran Church	17201 SR 67	The project consists of construction of a 5,745-square-foot sanctuary, 5,500-square-foot fellowship hall, two 3,700-square-foot administrative/classroom buildings, a 300-square-foot maintenance/utility building, 182 parking spaces, and associated landscaping.
11	MUP 08-032	Ramona Air Center, GPA, PAA, TM, MUP	402 Hughes Street	PAA 08-006, TM 5554, MUP 08-032 and MUP 71-396 W1.
12	MUP 78-121-06	Grace Community Church	1234 Barger Place	Modification proposes additional parking, building addition, canopy trellis, and new educational buildings. Project approved in August 2007.
13	MUP 92-006	Western/WSGP Ramona	23622 Isla Del Rey	Request to amend the Rancho San Vicente Specific Plan to eliminate the requirement to dedicate open space over certain residential lots located generally along the riparian corridor that forms the border between the developed area and the open space to the west.

Number	Case #	Project Name	Location	Available Description
14	MUP 96-017	Ramona Disposal	324 Maple Street	Transfer station to increase capacity to 700 tons per day.
15	MUP 68-007-01	Lemurian Fellowship	1869 La Brea Street	Proposes a new stand-alone single-family dwelling. There are already several structures on the property, and at least three septic systems.
16	MUP 70-379-03	Salvation Army	14488 Mussey Grade Road	Retreat and recreational facilities were destroyed during the October 2003 fires and are being rebuilt with increases in size of the structures by 4.9% ("Minor Deviation" from approved plot plan). Total building onsite will be 29,735 square feet. Erosion-control study led to hydroseeding (January 12, 2004). Certain best management practices are being used during construction.
17	MUP 84-045-04	Ramona United Methodist Church	3394 Chapel Lane	Addition of 1,600 square feet to an existing religious education building, add seven parking spaces and a 554-square-foot courtyard with a 217-square-foot trellis. Exempt from CEQA.
18	MUP 87-028-01	Highland Valley Ranch	1215 Magnolia Avenue	Increase residents (group care) from 16 to 52; add four new buildings and add 30 parking spaces.
19	MUP 94-010-09	Ramona Baseball Lighting Project	223 Aqua Lane	Minor Deviation for lighting.
20	MUP 94-010-10	Ramona Municipal Water District	125 N 2nd Street	Minor Deviation to add one Sea Cargo container and relocate Sea Cargo Containers
21	PAA 08-003	McDonald	17425 SR 67	9.78-acre site zoned A70 - RR2. Re-subdivision of TM5378. Originally eight lots, proposed 15.
22	STP 02-064	Souza Site Plan/One Stop Rental	254 Pine Street	Site is currently used as landscape supply and equipment rental facility. The site plan proposes construction of two new buildings, including paved parking areas and equipment and supply storage areas and the removal of the existing buildings. The first building would be 13,500 square feet and the second building would be 10,500 square feet.
23	STP 04-048	Ramona Fitness	558 Main Street	Remodel of existing 10,401-square-foot Ramona Fitness Center to be used for the same purpose upon completion. The renovation of the front half of the structure is extensive, but the overall size of the building will not change.
24	STP 04-059	B&M Automotive	1850 Main Street	Auto repair shop. Negative Declaration approved April 2007.
25	STP 05-025	Ramona Municipal Water District	105 Earlham Street	The site plan is for a one-story 1,028-square-foot accessory building for the Ramona Municipal Water District offices. CEQA exempt.
26	STP 06-009	Sunrise Villas	1918 Kelly Avenue	Site Plan pursuant to the "B" Special Area Regulations Designator (Community Design Review) and the "D" Special Area Regulations Designator (Design Review) to construct an 11-unit apartment building on a vacant lot.
27	STP 06-024	Ramona Longs Drugs	1750 Main Street	Project includes a 15,790-square-foot drug store. Project approved June 2008.
28	STP 07-042	Ramona Care Facility	1236 D Street	Ramona Care Facility, "B" Designator for a 30-unit senior care facility. Project would generate 75 average daily trips.
29	STP 07-048	Day Site Plan	No Address	Site Plan to construct a two-story 2,387-square-foot commercial office building.
30	STP 07-051	Ramona Hangers	402 Hughes Street	Existing airport on leased County Airports Division; leasing portion to expand storage and maintenance facilities. Six new airplane hangars.

Number	Case #	Project Name	Location	Available Description
31	STP 08-009	Brewer Land Company, Crane Maintenance Site	845 Schoolhouse Road	Construction of a crane maintenance facility to house an office building, crane maintenance building, and associated paved parking area.
32	STP 02-011-01	Progressive Properties	831 D Street	Reconfiguration of handicapped parking spaces, addition of flag pole, and bicycle parking. CEQA exempt.
33	STP 03-077-01	Meurs Office	419 D Street	Construction of a 129,670-square-foot self-storage facility and a 1,320-square-foot management office. Three one-story perimeter buildings surround four two-story interior storage buildings. The project requires 6,500 cubic yards of cut, 20,000 cubic yards of fill. A Mitigated Negative Declaration was completed in 2005. Minor Deviation approved in August 2006.
34	STP 03-079-01	Olive Street Self Storage	North side of Olive Street between Pine Avenue and Maple Avenue	Add a 988-square-foot second-story addition to the office building of a previously approved self-storage facility.
35	SP 01-001	Montecito Ranch	Generally north of the Ramona Airport and north of the existing right-of-way of Montecito Way	Comprises approximately 953 acres. Rural development of 417 single-family units integrating large-lot residential uses over most of the site and industrial uses located in closer proximity to the Ramona Airport. Overall density of 0.5 dwelling units per acre. No industrial development allowed east of Montecito Way. The site has varying topography, with the southern portion of the site being relatively level, and the more easterly and northerly portions of the site varying from moderate to steep slopes.
36	SP 01-002	Oak Country Estates	No Address	57 lots sold for open space.
37	TM 4962	M.D.S. Development Corp.	West of Black Canyon Road near Nicole Street	Replacement of road; open space easement to be vacated.
38	TM 5008	Ramona Ridge Estates	25858 SR 78	A subdivision of approximately 215 acres into 18 lots and a 45-acre remainder parcel. Proposed lots range in size from 8 to 17 acres. Lots will be served by wells and individual sewage disposal systems. The site is within a (20) Agriculture Preserve Land Use Designation and the A72 General Agricultural Use Designation. Major issues included biological impacts to the golden eagle and coastal sage scrub, and the loss of agricultural lands. A Negative Declaration was issued in 1999, but PERB denied the project based on inadequate environmental review and unmitigated impacts that could only be resolved in an EIR.
39	TM 5042	Lakeside Ventures	1760 Keyes Road	Construction of 20 single-family residences on a 202-acre site.
40	TM 5091	Barrett, Hibbard & Co	1407 Main Street	Construction of 12 single-family residences on approximately 49.67 acres.
41	TM 5188	Brisson	860 San Vicente Road	Project would create 12 residential lots on 3.75 acres. Access would be from 11th Street with a new private road and from San Vicente Road for one lot. Approved June 2007.
42	TM 5194	Teyssier	19587 Horizon View Drive	Subdivision of 287 acres into 36 residential parcels for single-family residential, ranging from 5.5 to 10 acres per parcel, but typical size of 8 acres. Site is currently an avocado grove with two reservoirs, which will remain. Per environmental analyses, the project could result in potentially significant impacts to biological resources, unless mitigated, including to southern coast live oak riparian forest, southern willow scrub, wetlands, and discharge/drainage patterns.

Number	Case #	Project Name	Location	Available Description
43	TM 5198	Rancho Esquilago	Highland Valley Road and Traylor Road	24 residential lots and open space.
44	TM 5244	Stonecrest Development	Haverford Road and Pine Street	A subdivision of 67.76 acres into 14 lots ranging in size from 4.08 to 5.88 acres. A 40-foot-wide private road easement to serve the lots will be located approximately 650 feet north of the Haverford Road/Pine Street intersection. Open space easements will be dedicated along the northwest and southern portions of the project site to protect and preserve southern coast live oak habitat and jurisdictional waters. A Mitigated Negative Declaration was revised in January 2004 in response to public comments.
45	TM 5257	Sunset Vista	1454 Ashley Road	The project proposes a major subdivision of 9.3 gross acres into eight residential lots ranging in size from 1.06 to 1.40 acres. Approved May 2007.
46	TM 5267	Roberts	17172 Salt Mine Road	Major subdivision of eight lots (53.34 gross acres) that will range in size from 2 to 14.11 net acres. Per the environmental analysis form, project impacts could result in potentially significant impacts unless mitigation is incorporated for biological resources. Site contains two sensitive habitats (southern coast live oak and oak riparian forest) in addition to wetland habitats and wildlife dispersal corridors. Approved October 2003.
47	TM 5311	Meadow Builders	1121 Pahls Way	Development of a 12-lot subdivision.
48	TM 5329	Mount Woodson	West of SR 67 and south of South Woodson Road	Division of 84 acres into 23 lots for 22 single-family residents and one open space lot.
49	TM 5347	Nickel Creek	14th Street, just north of SR 67	Division of 10.10 acres into two lots. One lot will be subdivided into four more lots to house 45 condominiums. The second lot on the lowland portion of the site will be retained as open space to mitigate biological impacts. Approved April 2007.
50	TM 5368	Maple Street Business Park Condos	432 Maple Street	The project proposes to convert 16 existing industrial and commercial units into a 16-unit industrial and commercial condominium complex. The project is exempt from CEQA. Approved February 2005.
51	TM 5378	Estates At McDonald Park	518 Ramona Street	Construct 11 single-family homes with lot size from 0.5 acre to 1.44 acres.
52	TM 5480	Valley Park Condominiums	430 16th Street	Project includes 62-lot condominium map with D3 Designator on a 2.86-acre site.
53	TM 5509	Paseo Village Townhomes	1037 Olive Street	Project includes 31-unit condominiums on 2.28-acre site. Project would generate 248 average daily trips.
54	TM 5535	LB Village Investments	1391 Pahls Way	Project proposing to develop an approximately 1.47-net-acre site into 14 residential condominiums.
55	TM 5537	“F” Street Subdivision	310 E Street	10-lot subdivision on 2.06-acre site.
56	TPM 20465	Charles & Suzanne Cavins	Walnut Street	Construction of five single-family residences on 40 acres.
57	TPM 20498	Quisenberry Family Trust	850 Main Street	Minor subdivision of a 37-acre lot into five parcels, including a remainder parcel. An 8-inch-diameter water line will also be installed in Rancho Maria Lane to the northwest edge of the property. Approved August 2001.

Number	Case #	Project Name	Location	Available Description
58	TPM 20564	Mccandless	1666 Hanson Lane	Minor subdivision of 41.54 acres into four parcels and a remainder parcel. Building improvements such as driveways, house pads, and leach fields. An open space easement on 47% of the property is proposed to mitigate encroachment into oak woodland and coastal sage scrub habitat.
59	TPM 20615	Weinstock, Norman	No Address	Construction of five single-family residences on 37.5 acres.
60	TPM 20679	Herold	170 Hillcrest Lane	Minor subdivision of 4.67 acres into four lots ranging in size from 1.03 to 1.58 acres. Approved March 2007.
61	TPM 20703	Herold – Ashley Road	1292 Ashley Road	Project would subdivide 2.5 acres into four parcels, with a parcel size ranging from 0.5 to 0.78 gross acres. Each parcel would house 1.6 dwelling units per acre. Approved May 2005.
62	TPM 20724	Quisenberry	815 14th Street	A minor subdivision to create three parcels on a 1.26-acre parcel. The proposed use of the lots will be for residential occupancy, and will require minimal grading since the topography is flat. There is an existing onsite residence, which will remain, and a well that will be destroyed. A Mitigated Negative Declaration was adopted in 2006 and the project was approved in May 2006.
63	TPM 20747	Kvaas	Rainbird Road and Mykrantz Truck Road	Minor subdivision of 60.3 acres into four residential parcels and a remainder parcel ranging from 10.7 to 11.5 acres.
64	TPM 20749	Saffian	2198 Pine Street	Minor subdivision of 20 gross acres into four residential parcels ranging from 4.1 to 5.3 acres. Approved March 2007.
65	TPM 20760	Ledesma Lane	1205 Ledesma Lane	Project is a four-lot subdivision on a 2.53-acre parcel. One existing residence onsite that will remain, and three single-family residences would be added. Grass-lined storm drainage swale will be constructed across the property. Approved July 2005.
66	TPM 20766	Wakeman	498 Grapefruit	Project is subdivision of 22.2 acres into four parcels and a remainder parcel. Parcel size would range from 4.1 to 5.2 acres. Approved December 2005.
67	TPM 20769	Thompson	717 Haverford Road	Project would create a 4.27-acre lot with access from a proposed private road easement from Assessor's Parcel Number (APN) 279-180-12. The remainder parcel would be 7.14 acres and contains an existing single-family residence. No major grading is proposed. Approved October 2005.
68	TPM 20770	Taylor	East of SR 67 between Mount Woodson Road and Archie Moore Road	Minor subdivision of 34.7 acres into four lots measuring between 2.53 and 2.89 acres, with a remainder parcel of 23.7 acres. Approved November 2006.
69	TPM 20771	Sorric	718 10th Street	Project would subdivide 1.01-acre parcel into four lots ranging from 0.19 to 0.25 acre. The project includes a remainder parcel of 0.21 acre. Approved August 2006.
70	TPM 20801	Herman	2268 El Paso Street	Project would subdivide 10.11 acres into four lots.
71	TPM 20808	Young	16th Street	A 1.77-acre site with four lots ranging from 10,000 square feet. Approved September 2005.
72	TPM 20909	12th St	705 12th Street	Project proposes a two-lot split in a residential neighborhood on 12th Street near H Street. Approved January 2007.
73	TPM 20910	Parker Lane	1650 Parker Lane	The project proposes to divide 0.77 net acres into two parcels measuring 14,630 square feet and 18,893 square feet. An existing single-family residence is located on the proposed parcel 1. CEQA exempt. Approved February 2007.
74	TPM 20919	Herold	507 G Street	Standard Tentative Parcel Map for four lots. CEQA exempt. Approved October 2007.

Number	Case #	Project Name	Location	Available Description
75	TPM 20922	H Street	920 H Street	Tentative Parcel Map for four lots. Approved August 2006.
76	TPM 20926	Filippini	955 Cedar Street	Divide 9.25-acre parcel into two parcels of 4.01 and 5.34 gross acres. Approved December 2006.
77	TPM 20962	Neuman	23414 SR 78	Project would divide 39.4 acres into four lots. The site contains steep slopes as defined by RPO, coastal sage scrub and chaparral, and is in the scenic corridor of SR 78. Potential impacts to 7.31 acres of coastal sage scrub and 2.22 acres of chamise chaparral.
78	TPM 20977	Keyes Road	1905 San Vicente Road	Project would create four parcels plus remainder on 12.9 acres. Project is listed as inactive.
79	TPM 20990	Walnut Street	1512 Walnut Street	Project would create four lots on 4.22-acre parcel.
80	TPM 21031	Kruse	18729 Highland Valley Road	Project is a two-lot subdivision on 4.67 acres. Mitigated Negative Declaration approved July 2008.
81	TPM 21043	Agha	1219 9th Street	Project would subdivide a 1.03-acre lot into two parcels. The site contains an existing single-family residence that would be retained. Exempt from CEQA. Approved December 2007.
82	TPM 21051	Highland Valley	No Address	Project would divide 38-acre parcel into three lots and remainder parcel.
83	TPM 21056 PAA06-005; GPA07-005; ER Log No.: 07-09-002	Faaborg	1602 Hanson Lane	Rezone to decrease minimum lot size from 4 acres to 2 acres. General Plan Amendment to change General Plan from 19 (Intensive Agriculture) to 17 (Estate Residential).
84	TPM 21070	Dekoven Project	829 D Street	Project would subdivide a 10.87-acre lot into four discrete parcels.
85	TPM 21071	Pfau	1713 Vermont Street	Project is a 30-acre subdivision of four parcels plus remainder parcel. There are major project issues, including secondary access and groundwater. No activity since April 2008.
86	TPM 21082	Zeigler	2126 Boundary Avenue	Project is a two-lot subdivision on 10.87 acres. Applicant requesting Urban Lot Split Exemption Request.
87	TPM 21083	Wood	854 Rancho Bullard Lane	Project to split 1.28 acres into four lots. Approved October 2008.
88	TPM 21109	Bain	2018 Pine Street	Project would create three lots on 0.39 acres. Submitted July 7, 2007.
89	NA	RMWD SMWWTP Expansion Project	260 North Sawday Street	RMWD lead agency for project to expand the capacity of existing SMWWTP to 1.47 MGD in three phases. The project would also construct two new wet weather storage ponds located west of the existing ponds, and the existing spray fields east of Rangeland Road would be reconfigured as evaporation terraces. Final EIR approved April 2010.
90	NA	RMWD Downtown Operational Storage Zone Improvements	Not yet finalized	RMWD is currently planning a new reservoir (consisting of two 1.5-million-gallon tanks) that would serve the southwestern area (Phase I) of the Downtown Operational Storage Zone. RMWD would serve as lead agency for the project.

CHAPTER 2.0
SIGNIFICANT ENVIRONMENTAL EFFECTS WHICH CANNOT BE AVOIDED IF THE PROPOSED PROJECT IS IMPLEMENTED

This chapter of the EIR provides a detailed discussion of the issue area of Transportation and Traffic, as this issue area would have significant environmental effects that could not be avoided if the proposed project were implemented. For these significant environmental impacts, mitigation is either infeasible or does not reduce the impact to below a level of significance. The analysis for Transportation and Traffic consists of the following subsections:

- **Existing Conditions** – This section describes the existing conditions of the proposed project site at the time the NOP was issued with regard to the environmental factors reviewed.
- **Guidelines for the Determination of Significance** – This section explains how an impact is judged to be significant in this EIR.
- **Analysis of Project Effects and Determination of Significant Impact –** This section provides an analysis of potential impacts of the proposed project and explains why the impacts were found to be significant. Significant impacts are numbered to correspond to mitigation measures. Less-than-significant impacts are not numbered.
- **Cumulative Impact Analysis –** This section discusses the potential for the project to incrementally add to cumulative impacts. Analysis is provided to determine if implementation of the project would result in cumulatively considerable impacts. Significant impacts are numbered to correspond with mitigation measures. Less-than-significant impacts are not numbered.
- **Mitigation Measures –** This section identifies mitigation measures that would mitigate each impact found to be significant. When a mitigation measure would not reduce an impact to less than significant, discussion is included to show why the mitigation measures does not fully mitigate the impact or why additional mitigation is not feasible. Each mitigation measure is numbered to correspond with the associated impact. The level of significance after implementation of the mitigation measures is identified.
- **Conclusions** – This section states a conclusion as to whether each of the project's significant environmental effects have or have not been reduced to below a level of significance through mitigation, and the supporting rational for that conclusion.

2.1 Transportation and Circulation

The information and conclusions in this section are based on the traffic analysis prepared by RCE Traffic and Transportation Engineering (RCE 2010), which is provided as Appendix A.

2.1.1 Existing Conditions

Existing Circulation Network

State Route 67

SR 67 is classified as a four-lane Major Road (4.1A) from Mussey Grade Road to Ramona Street in the Mobility Element of the County General Plan. West of Mussey Grade Road, SR 67 is classified as a Major Road. The California Department of Transportation (Caltrans) classifies SR 67 as a "four-lane conventional highway." In the vicinity of the project site, SR 67 has two through-lanes plus shoulders. SR 67 west of Archie Moore Road is a two-lane roadway with passing lanes at various locations and shoulders. Major intersections along SR 67 occur at Scripps Poway Parkway (signalized), Poway Road (signalized), Archie Moore Road (unsignalized), and Highland Valley Road (signalized). Due to capacity restrictions and intersection operations at the Highland Valley Road/SR 67 signalized intersection, lengthy queues develop on SR 67 exiting Ramona during the morning peak hours and entering Ramona during the afternoon peak hours. SR 67 is included in the County's bicycle network system.

Highland Valley Road

Highland Valley Road is a two-lane roadway that is classified as a Community Collector (2.1E) in the County Mobility Element. Highland Valley Road provides access to SR 67 for the properties located to the north. In the project area, Highland Valley Road has two lanes, shoulders, and a pavement width of 36 to 40 feet. Highland Valley Road is included in the County's bicycle network system.

Dye Road

Dye Road is classified as a Community Collector Road (2.1C) in the County Mobility Element. Dye Road currently provides access to the San Diego Country Estates development and the Barona Indian Reservation. Dye Road is included in the Ramona Community Plan as a major component to the proposed "south bypass" to provide alternatives to SR 67 and Main Street. In

the vicinity of the project site, the road has two lanes, with a pavement width of approximately 40 feet. Dye Road is included in the County's bicycle network system.

Study Intersections

The area of study for the traffic analysis included those intersections that operate at level of service (LOS) E or F, received 25 or more peak-hour project traffic trips, or had the potential for significant effects. The area of study includes the following intersections:

- SR 67 and Scripps Poway Parkway
- SR 67 and Poway Road
- SR 67 and Highland Valley Road
- SR 67 and Archie Moore Road
- SR 67 and Montecito Road
- SR 67 and SR 78
- Project Roadways and Highland Valley Road

Level of Service Methodology

LOS is a qualitative measure used to describe the operational conditions within a traffic stream, and a motorist and/or passenger's perception of the performance of the roadway. LOS is designated by a letter from A to F, with LOS A representing the best operating conditions and LOS F the worst. LOS C is typically used as a design standard, while LOS D is considered acceptable for peak-period operating conditions by most jurisdictions.

Existing Roadway Level of Service

Mobility Element roadways within the project area were evaluated using daily LOS volumes provided by the County. This methodology compares daily traffic volumes to roadway classifications to determine the approximate daily street segment LOS. Existing daily traffic volumes for the study area roadways were obtained from traffic counts performed in May 2007. Existing weekday average daily traffic (ADT) volumes are shown in Figure 2.1-1. These volumes were compared to the County's capacity standards to determine the LOS for the Mobility Element roadway segments. This analysis shows that all roadways within the project area currently operate at LOS D or better, with the exception of SR 67 between Scripps Poway Parkway and Pala Street, which currently operates at LOS F.

Existing Intersection Level of Service

Intersection LOS was evaluated using the 2000 Highway Capacity Manual methods for signalized and unsignalized intersections. LOS calculations are provided as an attachment to the traffic analysis, which is provided in Appendix A. Existing daily traffic volumes for the study area intersections were obtained from traffic counts performed in May 2007. The County requires traffic counts to be taken within 2 years to accurately reflect current conditions. New counts were taken in September 2008 and compared with the May 2007 counts. It was determined that the September 2008 counts were slightly less than the May 2007 counts. The May 2007 counts were used in this study to provide a more conservative analysis. All study area intersections operate at LOS D or better under existing conditions, with the exception of the SR 67 and Highland Valley Road intersection, which currently operates at LOS E during the morning peak hours.

Applicable Regulations and Policies

County of San Diego

An objective of the Mobility Element of the County General Plan (County of San Diego 2011a) is to provide an LOS D or better on County Mobility Element roads. Fairshare contributions to fee programs or other roadway improvements are allowed to achieve these objectives. Applicable County policies are outlined below.

GOAL M-2: Responding to Physical Constraints and Preservation Goals. A road network that provides adequate capacity to reasonably accommodate both planned land uses and regional traffic patterns, while supporting other General Plan goals such as providing environmental protections and enhancing community character.

M-2.1: Level of Service Criteria. Require development projects to provide associated road improvements necessary to achieve a level of service of "D" or higher on all Mobility Element roads except for those where a failing level of service has been accepted by the County pursuant to the criteria specifically identified in Chapter 4 of the Mobility Element (Criteria for Accepting a Road Classification with Level of Service E/F). When development is proposed on roads where a failing level of service has been accepted, require feasible mitigation in the form of road improvements or a fair share contribution to a road improvement program, consistent with the Mobility Element road network.

GOAL M-3: Transportation Facility Development. New or expanded transportation facilities that are phased with and equitably funded by the development that necessitates their construction.

M-3.1: Traffic Impact Mitigation. Require development to contribute its fair share toward financing transportation facilities, including mitigating the associated direct and cumulative traffic impacts caused by their project on both the local and regional road networks. Transportation facilities include road networks and related transit, pedestrian and bicycle facilities, and equestrian.

GOAL M-11: Bicycle and Pedestrian Facilities. Bicycle and pedestrian networks and facilities that provide safe, efficient, and attractive mobility options, as well as recreational opportunities for County residents.

M-11.1: Bicycle Facility Design. Support regional and community-scaled planning of pedestrian and bicycle networks.

M-11.3: Bicycle Facilities on Roads Designated in the Mobility Element. Maximize the provision of bicycle facilities on County Mobility Element roads in Semi-Rural and Rural Lands to provide a safe and continuous bicycle network in rural areas that can be used for recreation or transportation purposes, while retaining rural character.

The County approved a Transportation Impact Fee (TIF) program for County projects (County of San Diego 2005b, 2006a, 2008). The purpose of a TIF is to make a provision for assessing and collecting fees as a condition of approval of a tentative subdivision map, approval of a tentative parcel map, or prior to issuance of a development permit, including building permit, to defray the actual or estimated costs of constructing planned transportation facilities necessary to accommodate increased traffic generated by future development, pursuant to Section 66000 et seq. of the California Government Code (Mitigation Fee Act).

The TIF program provides a mechanism for mitigating the impacts created by future growth within the unincorporated area. The TIF is a fee program designed to facilitate compliance with the CEQA mandate that development projects mitigate their indirect, cumulative traffic impacts. The County TIF program assessed the fee on all new development that results in new/added traffic. The primary purpose of the TIF is twofold: (1) to fund the construction of identified roadway facilities needed to reduce, or mitigate, projected cumulative traffic impacts resulting from future development within the County, and (2) to allocate the costs of these roadway facilities proportionally among future developing properties based on their individual cumulative traffic impacts.

TIFs are collected into 23 local Community Planning Area accounts, three regional accounts, and three regional freeway ramp accounts. TIFs are only used to pay for improvements to roadway facilities identified for inclusion in the TIF program, which includes both County roads and Caltrans highway faculties. TIFs collected for a specific local or regional area must be spent in the same area. For example, TIFs collected in the North Region TIF account may only be used for improvements to TIF facilities in the North Region. By ensuring that TIFs are spent for the specific roadway improvements identified in the TIF program, the CEQA mitigation requirement is satisfied and the Mitigation Fee Act nexus is met.

As part of the TIF program process, transportation infrastructure needs are characterized as existing deficiencies, direct impacts of future development, or indirect (cumulative) impacts of future development. Existing roadway deficiencies are the responsibility of existing developed land uses and government agencies, and cannot be financed with impact fees. The TIF program is not intended to mitigate direct impacts, which will continue to be the responsibility of individual development projects. The TIF program, therefore, is designed to only address the cumulative impacts associated with new growth.

The County TIF program enables projects to complete CEQA compliance and move forward by paying a fair share of the cost of improving roads in the future as LOS becomes unacceptable due to increased traffic volume caused by the cumulative impacts of various developments. The County's TIF program goes into great detail in identifying anticipated development, the roads affected, roadway costs, and the existing and projected LOS on those roads. As sufficient funds become available, the County will implement the improvements that it has committed to.

This project and all projects are required to apply for a County of San Diego Traffic Control Permit for construction work within or near County ROWs where traffic operations may be affected. A County construction and/or encroachment permit may also be required. The Traffic Control Permit would likely include a Traffic Control Plan with traffic measures and that would be implemented to ensure that traffic operations on public roads (including motorists, pedestrians, and bicyclists) during construction are adequately addressed, and may exceed measures found in standard government manuals for traffic control.

2.1.2 Guidelines for the Determination of Significance

The guidelines for determination of significance for traffic impacts were derived from various sources. Quantifiable direct and cumulative impacts such as LOS, ADT, or delay times are based on standards outlined in the County of San Diego Mobility Element of the General Plan, which serves as the transportation planning document for the project area. The County Traffic and

Transportation Guidelines for Determining Significance (August 2011) is also used as a source for quantifiable thresholds. Additional thresholds related to safety are taken from the CEQA Appendix G Checklist. The Cumming Ranch project would result in a significant transportation and circulation impact if it would do any of the following:

1. Result in a direct degradation of roadway or intersection LOS below LOS D, per the County General Plan Mobility Element.
2. Result in a direct addition or redistribution of traffic that would significantly increase congestion on a roadway or intersection currently operating at LOS E or LOS F, as defined in the following table. Significant increases on congested roads and intersections are defined based on a level that would be perceived by a driver.

Road Segments			
	2-LANE ROAD	4-LANE ROAD	6-LANE ROAD
LOS E	200 ADT	400 ADT	600 ADT
LOS F	100 ADT	200 ADT	300 ADT
Intersections			
	SIGNALIZED	UNSIGNALIZED	
LOS E	Delay of 2 seconds	20 peak-hour trips on a critical movement	
LOS F	Delay of 1 second, or 5 peak-hour trips on a critical movement	5 peak-hour trips on a critical movement	

Source: County of San Diego 2011b

3. Result in a direct addition or redistribution of traffic that would cause an onsite roadway segment LOS (including Highland Valley Road through the project site) to degrade to below LOS C.
4. Contribute to a cumulative impact to a roadway or intersection LOS below LOS D. Cumulative impacts are considered by comparing existing conditions against conditions with projects that may be approved or developed in the project area in combination with the proposed project.
5. Result in additional or redistributed traffic that would contribute to congestion on a roadway or intersection currently operating at LOS E or LOS F under cumulative conditions. Significant cumulative increases on congested roadways are the same as shown above for Guideline 2.
6. Substantially impact traffic safety due to a design feature (e.g., sharp curves or dangerous intersections, limited site distance) or incompatible uses (e.g., farm equipment).
7. Result in a potentially significant hazard or barrier for pedestrians or bicyclists.

2.1.3 Analysis of Project Effects and Determination of Significant Impact

As detailed in the traffic report (Appendix A), the Cumming Ranch project is anticipated to generate ADT of 1,500 vehicles per day. The net increase of traffic to the street system during AM peak hours is 120 trips and during the PM peak is 150 trips. The anticipated distribution of these additional trips is provided in Appendix A. Based on this distribution, the anticipated operation of project area roadways and intersections was considered for existing-plus-project conditions.

Roadway Segments

The LOS of the project area roadway system based on existing-plus-project traffic conditions are shown in Table 2.1-1. Analysis of these volumes reveal that all roadways in the project area with the addition of project traffic would operate at LOS D or better, with the exception of the SR 67 street segments between Scripps Poway Parkway and Pala Street, which would continue to operate at LOS F based on the County's capacity standards. ADT along SR 67 between Scripps Poway Parkway and Poway Road would increase to 22,134, with 480 trips per day attributable to the proposed project. ADT along SR 67 between Poway Road and Archie Moore Road would increase to 26,392, with 930 trips per day attributable to the proposed project. ADT along SR 67 between Archie Moore Road and Mussey Grade Road would increase to 24,992, with 1,045 trips per day attributable to the proposed project. The ADT along SR 67 from Mussey Grade Road to Pala Street would increase to 24,475, with 225 daily trips attributable to the proposed project. Therefore, per Guidelines 1 and 2, above, the proposed project's contribution of more than 200 ADT to the poor operating condition of these segments of SR 67 would be a ***significant impact*** (**Impact TR-1**).

Onsite roadways include the proposed internal street system and a segment of Highland Valley Road. The internal street system is adequate to provide service to the new residential development, and the segment of Highland Valley Road that passes through the project site would continue to operate at LOS B with the addition of project traffic. Therefore, the project would not result in a direct addition or redistribution of traffic that would cause an onsite roadway segment LOS to degrade to below LOS C, per Guideline 3, and the impact would be ***less than significant***.

Intersections

The LOS for project area roadway intersections under existing-plus-project conditions is shown in Table 2.1-3. This table shows that all project area intersections currently operate at LOS D or better. All of these intersections would continue to operate at LOS D or better with the addition

of project-generated traffic, with the exception of the SR 67 and Highland Valley Road intersection, which would continue to operate at LOS E. This intersection currently operates at LOS E and, thus, the addition of project traffic would not directly degrade the intersection to a poor operating condition, per Guideline 1. However, per Guideline 2, the addition of project traffic would further degrade the LOS E operating condition of the SR 67 and Highland Valley Road intersection, and would be considered a ***significant impact*** (**Impact TR-2a**).

The intersection of SR 67 and Archie Moore Road currently operates at LOS D in both the AM and PM peak hours, based on the intersection counts taken in 2007. However, information provided by Caltrans (Caltrans 2008) indicates that current operation of this intersection is not adequate. Therefore, to be conservative in analysis of potential project effects, it is assumed that the addition of project traffic would significantly directly impact the intersection. As described above, to be consistent with the Caltrans recommendations at this location, and to provide a conservative analysis of potential project impacts, the addition of project traffic to the SR 67 and Archie Moore Road intersection would be considered a ***significant impact*** **(Impact TR-2b)**.

Traffic Safety

The project and associated roadway improvements would not create any unsafe traffic conditions or hazards. The proposed roadway improvements would generally widen existing roadways and intersections, and would not result in dangerous roadway conditions such as dangerous curves or limited lines of sight. In addition, the proposed entrances to the project off of Highland Valley Road are not located at dangerous locations such as a sharp curve or steep hill. The County requires a minimum distance of 300 feet between non-mobility-element roads entering onto a mobility-element roadway (i.e., Cumming Ranch project entry roads connecting to Highland Valley Road). The project was designed with a minimum of 650 feet between the project entry roadways. The project includes left-turn lanes on Highland Valley Road to improve safety for vehicles turning to enter the property. The vehicles from the proposed residential development that would use the area roadways would be typical passenger vehicles, and no incompatible use of the roads would result. Traffic and emergency vehicle safety hazards would be ***less than significant***, per Guideline 6, because the project does not include features that would substantially impact traffic safety.

The project proposes to improve Highland Valley Road adjacent to the project site to provide bike lanes per Rural Collector roadway standards. The project would also provide pedestrian pathways along Highland Valley Road in the project area, as well as trails and pathways throughout the project site. There would be a ***less-than-significant*** impact to pedestrian and

bicyclist safety, per Guideline 7, because the project would create no hazards or barriers for pedestrians and bicyclists.

2.1.4 Cumulative Impact Analysis

This section analyzes the roadway network assuming the construction of all projected development within and adjacent to the Ramona Community Planning Area. The Ramona Community Planning Area is included as part of the cumulative traffic analysis, since traffic tends to be a regional issue with local problems resulting. A cooperative study was completed in 2004 by local traffic engineers preparing studies for projects in the Ramona area. The intent of this cooperative study was to assemble all cumulative projects and distribute their projected traffic onto the existing roadway network. A total of 60 cumulative projects were identified and included. The projected traffic for the Cumming Ranch project was included in this cumulative study. To accommodate the fluid nature of cumulative projects, a growth factor of 10% was added to the cooperative cumulative numbers developed for this analysis. The December 2008 traffic analysis prepared for this project (RCE 2010) compared the traffic numbers associated with the cumulative list for the Cumming Ranch EIR with the 2004 cooperative cumulative study. The results revealed that the 2004 cumulative projects numbers with the 10% growth factor added provided the most conservative (highest) traffic volumes and, thus, were used in the traffic analysis and this EIR. A list of the cumulative projects is also included in the Traffic Report (Appendix A of this EIR) as Appendix H.

The County Board of Supervisors adopted the TIF program in April 2005 to collect fees to fund identified transportation facilities (County of San Diego 2005b), and approved an update to the TIF program on January 30, 2008 (County of San Diego 2008). The TIF program for the Ramona area uses the projection method of analyzing cumulative impacts as provided in Section 15130(b)(1)(B) of the CEQA Guidelines. San Diego Association of Governments (SANDAG) regional land use forecasts and traffic models were used to determine the amount of expected future development and the types of transportation improvements needed. The County will use impact fees to fund construction of needed road improvements. These TIF facilities would provide the additional capacity necessary to accommodate the increased traffic generated by future development. The TIF program provides an opportunity for area projects to mitigate cumulative traffic impacts.

Roadway Segments

The LOS of the project area roadway system for existing-plus-cumulative traffic volumes are shown in Table 2.1-4. Five segments of SR 67 would continue to operate at LOS E or F based on the County's capacity standards, as described below:

- The segment of SR 67 between Scripps Poway Parkway and Poway Road would experience an increase of ADT from 21,654 up to 29,532 with the addition of cumulative traffic. Of the 7,878 cumulative trips, 480 would be a result of the Cumming Ranch project. The LOS for this segment would continue to operate at LOS F (Impact TR-3a).
- ADT along SR 67 would increase to as many as 32,862 trips per day from Poway Road to Archie Moore Road with the addition of 7,356 trips attributable to the cumulative projects. Of these trips, 930 trips per day would be associated with the Cumming Ranch project. The LOS for this segment would continue to operate at LOS F (Impact TR-3a).
- The segment of SR 67 between Archie Moore Road and Mussey Grade Road would experience an increase of ADT from 23,947 up to 31,645 with the addition of cumulative traffic. Of the 6,637 cumulative trips, 975 would be a result of the Cumming Ranch project. The LOS for this segment would continue to operate at LOS F (Impact TR-3b).
- ADT along SR 67 would increase to as many as 30,190 trips per day from Mussey Grade Road to Pala Street with the addition of 8,477 trips attributable to the cumulative project list. Of these trips, 225 trips per day would be associated with the Cumming Ranch project. The LOS for this segment would continue to operate at LOS F (Impact TR-3b).
- The segment of SR 67 from Pala Street to SR 78 would increase to 35,800 ADT with the addition of 5,121 trips attributable to cumulative traffic. The Cumming Ranch project would contribute 165 of these trips. The LOS for this segment would degrade from LOS D to E (Impact TR-3b).

The poor operating condition of these five segments of SR 67 in the cumulative scenario is considered a ***significant impact*** because Guidelines 4 and 5 would be exceeded (**Impact TR-3a-3b**).

Under the cumulative scenario, conditions on Dye Road south of SR 67 would also degrade to below the County's standard from LOS C to LOS E. With the addition of traffic attributable to the cumulative projects, ADT on this roadway would increase from 6,128 to 11,870 trips per day, of which 75 trips would be attributable to the proposed project. The poor operating condition of Dye Road in the cumulative scenario is considered a ***significant impact*** because Guidelines 4 and 5 would be exceeded (**Impact TR-4**).

Intersections

The intersection of SR 67 and Poway Road, as well as the four intersections of the project entry roadways and Highland Valley Road, would operate at LOS B during the AM and PM peak

hours; therefore, these intersections would not exceed Guidelines 4 and 5 and would result in a ***less-than-significant*** cumulative impact.

The SR 67/Archie Moore Road intersection would degrade to LOS F during the AM and PM peak hours. Cumulative conditions would add more than 500 vehicle trips through this intersection in the AM peak hour. The cumulative delay increase at this intersection would be approximately 48 seconds in the AM and 31 seconds in the PM hours, meaning that motorists would wait approximately 1 additional minute in the AM peak hours and 30 additional seconds in the PM peak hours to cross through the intersection. Because the increased ADT and delay at this intersection would exceed Guidelines 4 and 5, the cumulative impact at SR 67/Archie Moore Road is considered a ***significant impact*** (**Impact TR-5**).

The SR 67/Scripps Poway Parkway intersection would degrade to LOS E during the PM peak hours. The cumulative delay increase at this intersection would be 32 seconds in the PM, meaning that motorists would wait approximately an additional half-minute to cross through the intersection. Because the increased delay at this intersection would exceed Guidelines 4 and 5, the cumulative impact at SR 67/Scripps Poway Parkway is considered a ***significant impact*** (**Impact TR-6**).

As shown in Table 2.1-5, the SR 67/Highland Valley Road intersection would operate at LOS F during the AM and LOS E during PM peak hours under cumulative conditions. The delay increase that would result from the addition of cumulative traffic at this intersection would be 70 seconds in the AM and 35 seconds in the PM, meaning that motorists would wait approximately 1 additional minute in the AM and 30 seconds in the PM peak hours to cross through the intersection. Because the increased delay at this intersection would exceed Guidelines 4 and 5, the cumulative impact at SR 67/Highland Valley Road is considered a ***significant impact*** (**Impact TR-7**).

The SR 67/Montecito Road intersection would operate at LOS F in the PM peak under cumulative conditions. The cumulative delay would increase at this intersection by 42 seconds, meaning that motorists would have to wait almost 1 additional minute to cross through the intersection in the PM peak. Because the increased delay at this intersection would exceed Guidelines 4 and 5, the cumulative impact at SR 67/Montecito Road is considered a ***significant impact*** (**Impact TR-8**).

The SR 67 and SR 78 intersection would operate at LOS E in the PM peak under cumulative conditions. The cumulative delay would increase at this intersection by 18 seconds, meaning that motorists would have to wait this much longer to cross through the intersection in the PM peak.

Because the increased delay at this intersection would exceed Guidelines 4 and 5, the cumulative impact at SR 67/SR 78 is considered a ***significant impact*** (**Impact TR-9**).

2.1.5 Mitigation Measures

Mitigation Measure M-TR-1 Existing-Plus-Project Conditions – Street Segments

M-TR-1a. SR 67 – Scripps Poway Parkway to Archie Moore Road

This segment is currently a two-lane roadway with passing lanes at various locations. It currently operates at LOS F according to the County of San Diego's capacity standards for a two-lane highway. This segment will need widening to a four-lane facility for 5.1 miles to bring it to an acceptable level of service. Requiring the proposed project to construct these regional transportation improvements to this regional transportation facility would not be proportional to the project's impact to the facility. Furthermore, a substantial portion, 3.3 miles, is in another jurisdiction, the City of Poway, and the County does not have jurisdiction to require the mitigation. Therefore, this mitigation would not be feasible. Even within the County jurisdiction, improvements are not feasible because they would require extensive conversion of existing land uses beyond the purview/ability of a private project, and require regional highway improvements of a magnitude and scope disproportionate to the development project. In addition, widening of smaller segments of the roadways would not alleviate the current "bottleneck" situation within these road segments because, without widening the entire length of the segment currently operating at unacceptable levels, a "bottleneck" situation would persist. The resolution of the existing and projected inadequate service capacities along this regional arterial, which is designated a State Highway under Caltrans jurisdiction, must occur on a regional level. It should be noted that widening of Main Street (SR 67) from Highland Valley Road/Dye Road to Mapleview Street in Lakeside (a total of 15.3 miles) from two to four lanes is included in the Regional Transportation Improvement Plan (RTIP) as an engineering study. Because there are no reasonable improvements that this project can implement to increase the segment's capacity to acceptable levels, this segment will remain significant and unmitigated with project implementation.

M-TR-1b. SR 67 – Archie Moore Road to Pala Street

The roadway improvements as part of the project shall be implemented prior to issuance of the first occupancy permit on the site to the satisfaction of the County DPW and shall also be implemented to Caltrans' satisfaction (the segment can be seen in Figure 2.1-1 and the improvements are illustrated in Figure 1-8 and described in Section 1.1.2.) and include:

a. Eastbound SR 67 – Widen eastbound SR 67 west of the Highland Valley Road intersection to provide two through-lanes and storage in each lane. Widen east of the Highland Valley Road intersection to provide two through-lanes for 400 feet and transition back to the existing roadway width within a 660-foot transition.

b. Westbound SR 67 – Widen westbound SR 67 east of the Highland Valley Road intersection to provide two through-lanes with storage in each lane, with the westbound right-turn lane retained. Widen west of the Highland Valley Road intersection to provide two through-lanes for 400 feet and transition back to the existing roadway width within a 660-foot transition.

c. Highland Valley Road – Widen northbound Dye Road (Highland Valley Road) to provide duel left-turn lanes at the intersection.

d. Traffic Signal – The traffic signal at the SR 67/Highland Valley Road intersection shall be modified to provide for the improvements described above.

The construction of these improvements shall require additional ROW and the developer shall be responsible for funding the ROW acquisitions. In the event the developer is not able to acquire the necessary ROW from willing sellers during the final engineering process, the developer shall work with the County to acquire the ROW in accordance with County Board of Supervisors' Policy J-33.

Mitigation Measure M-TR-2 Existing-Plus-Project Conditions

M-TR-2a. SR 67 and Highland Valley Road Intersection

The direct impacts to the SR 67 and Highland Valley Road intersection shall be mitigated with the widening of SR 67 in the westbound direction to two lanes to accommodate morning peak traffic. This improvement is included in the overall intersection mitigation measures proposed under **Mitigation Measure M-TR-1** for the SR 67 and Highland Valley Road intersection to mitigate roadway segment direct impacts.

M-TR-2b. SR 67 and Archie Moore Road

A signal warrant analysis shall be conducted at this intersection prior to approval of the final map. If signal warrants are met, the developer shall restripe the intersection and install a three-way traffic signal within the existing right of way, to the satisfaction of Caltrans and the County of San Diego. If warrants are met, installation of the traffic signal shall be required to be completed prior to occupancy of the first dwelling unit.

Cumulative Conditions

A TIF program was adopted by the County for the Ramona community and provides opportunity for projects to mitigate cumulative traffic impacts through the payment of fees for their fair share of an impact. The widening of SR 67, improving Dye Road along the impacted segments, and improvements at the intersections described below are specifically included in the TIF program (County of San Diego 2006a, 2008). TIF improvements would be designed to create acceptable traffic operating conditions.

Mitigation Measure M-TR-3

Mitigation Measure M-TR-3a. SR 67 between Scripps Poway Parkway and Archie Moore Road

Payment of TIF fees would partially mitigate the segment of SR 67 between Scripps Poway Parkway and Archie Moore Road. A portion of this segment is within the City of Poway. The cumulative impact at this segment is partially mitigated by payment of the County TIF for impacts within the jurisdictional boundaries of the County. To fully mitigate the impact at this segment, the mitigation would require additional travel lanes on the impacted portion of the segment within the jurisdictional limits of the City of Poway (between Poway Road and Cloudy Moon Drive), but this mitigation is not feasible and, therefore, is not proposed to address this impact. Because there are no reasonable improvements that this project can propose to increase the segment's capacity to acceptable levels, this segment would remain significant and unmitigated with project implementation.

Mitigation Measures M-TR-3b. SR 67 Segments in County Jurisdiction

To mitigate the project's contribution to cumulative impacts along the three remaining SR 67 segments (**Impact TR-3b**), the project applicant shall pay the appropriate TIFs, as determined by the County prior to issuance of the first occupancy permit on the site to the satisfaction of the County DPW.

Mitigation Measure M-TR-4. Cumulative Conditions – Dye Road Segments

To mitigate the project's contribution to cumulative impacts along Dye Road segments (**Impact TR-4**), the project applicant shall pay the appropriate TIF fees as determined by the County prior to issuance of the first occupancy permit on the site to the satisfaction of the County DPW.

Mitigation Measure M-TR-5. Cumulative Conditions – SR 67/Archie Moore Road Intersection

To mitigate the project's contribution to cumulative impacts at the SR 67/Archie Moore Road intersection (**Impact TR-5**), the project applicant shall pay the appropriate TIF fees as determined by the County prior to issuance of the first occupancy permit on the site to the satisfaction of the County DPW.

Mitigation Measure M-TR-6. Cumulative Conditions – SR 67/Scripps Poway Parkway Road Intersection

To fully mitigate the project's contribution to cumulative impacts at the SR 67/Scripps Poway Parkway intersection (**Impact TR-6**), the project applicant shall pay the appropriate TIF fees as determined by the County prior to issuance of the first occupancy permit on the site to the satisfaction of the County DPW.

Mitigation Measure M-TR-7. Cumulative Conditions – SR 67/Highland Valley Road Intersection

To mitigate the project's contribution to cumulative impacts at the SR 67/Highland Valley Road intersection (**Impact TR-7**), the project applicant shall construct the intersection improvements outlined in **Mitigation Measure M-TR-1** prior to issuance of the first occupancy permit on the site to the satisfaction of the County DPW and Caltrans.

Mitigation Measure M-TR-8. Cumulative Conditions – SR 67/Montecito Road Intersection

To mitigate the project's contribution to cumulative impacts at the SR 67/Montecito Road intersection (**Impact TR-8**), the project applicant shall pay the appropriate TIF fees as determined by the County prior to issuance of the first occupancy permit on the site to the satisfaction of the County DPW.

Mitigation Measure M-TR-9. Cumulative Conditions – SR 67/SR 78 Intersection

To mitigate the project's contribution to cumulative impacts at the SR 67/SR 78 intersection (**Impact TR-9**), the project applicant shall pay the appropriate TIF fees as determined by the County prior to issuance of the first occupancy permit on the site to the satisfaction of the County DPW.

2.1.6 Conclusions

With implementation of the mitigation measures listed in Section 2.1.5, the proposed project's contribution to circulation system impacts would not exceed the traffic operation performance criteria as outlined in Guidelines 1 through 7 for Impacts TR-1b, TR-2, TR-3b, and TR-4 through TR-9. Thus, the potential traffic impacts at these locations would be reduced to a ***less-than-significant*** level, as described below. For Impacts TR-1a and TR-3a, no feasible mitigation was identified to reduce impacts, or mitigation could not reduce impacts to less than significant. Therefore, impacts at these locations would remain ***significant and unavoidable***, as described below.

Impact TR-1a: Existing-Plus-Project Conditions, SR 67 between Scripps Poway Parkway and Archie Moore Road. This road segment is partially in the City of Poway and partially in the unincorporated area of the County. This segment of SR 67 between Scripps Poway Parkway and Archie Moore Road is currently a two-lane roadway with passing lanes at various locations. It currently operates at LOS F according to the County's capacity standards for a two-lane highway. This segment would need widening to a four-lane facility to bring it to an acceptable LOS. Requiring the proposed project to mitigate with this regional transportation improvement would not be proportional to the project's impact. The segment of SR 67 within the County's boundaries is identified as a TIF facility and will be widened to a four-lane facility as part of the TIF program. The segment located within the City of Poway's boundaries is not included in the TIF and will require other funding sources to improve the roadway. Caltrans has prepared and approved a Project Study Report to improve SR 67 from Mapleview in Lakeside to Highland Valley Road in Ramona to a four-lane highway. Because there are no reasonable improvements that this project can propose to increase the segment's capacity to acceptable levels, this segment will remain significant and unmitigated with project implementation.

Rationale: The County, Caltrans, and the project applicant met and conferred regarding these impacts and appropriate mitigation. To fully alleviate the direct impacts (Impact TR-1a) to roadway segments, SR 67 would need to be widened to a four-lane facility for 5.1 miles to bring it to an acceptable LOS. Neither Caltrans nor Poway has a funded program in place for adding additional lanes to SR 67 in this segment in time to avoid the project's direct or cumulative impacts. Even though the project includes mitigation that improves traffic on SR 67, there are no other reasonable improvements within the County's jurisdiction that this project can implement to increase the segment's capacity to acceptable levels. Therefore, this segment would remain significant and unmitigated with project implementation.

Adequate mitigation requires regional improvements beyond the ability of a private project to pursue, including extensive conversion of existing land uses. Widening smaller segments of the roadways would not alleviate the current "bottleneck" situation within these road segments because, without widening the entire length of the segment currently operating at unacceptable levels, a "bottleneck" situation would persist. Resolution of the existing and projected inadequate service capacities must occur on a regional level. It should be noted that the RTIP includes an engineering study for widening Main Street (SR 67) from Highland Valley Road/Dye Road to Mapleview Street in Lakeside (a total of 15.3 miles). However, there are no local improvements that this project can implement to increase the capacity to acceptable levels. Therefore, this segment would remain significant and unmitigated with project implementation.

In addition to having a regional scope, adequate mitigation would require regional highway improvements of a magnitude disproportionate to the applicant's development project. Requiring the project to construct additional lanes over 5.1 miles to mitigate the impact would not be proportional to the project's contribution of less than 3% of the traffic on this road segment, and the cumulative projects' combined contribution of approximately 20% of the traffic along this roadway segment (CEQA Guidelines, Section 15126.4[a][4][B]).

Even though the project includes mitigation that partially improves capacity on SR 67, the direct impact at SR 67 between Scripps Poway Parkway and Archie Moore Road would remain ***significant and unavoidable***.

Impact TR-1b: Existing-Plus-Project Conditions, SR 67 between Archie Moore Road and Pala Street. Table 2.1-6 demonstrates that, for critical directions of traffic on SR 67, the mitigation proposed for the SR 67/Highland Valley Road intersection improves the segment travel times to better than existing conditions. For the AM peak hour, westbound SR 67 between Pala Street and Highland Valley Road is the critical segment. This segment is calculated to have an existing travel time of 195.1 seconds during the AM peak. Adding project traffic to this segment would increase this travel time to 202.0 seconds. After construction of the proposed mitigation improvements to the intersection, it is calculated that this travel time would be reduced to 181.3 seconds. For the PM peak hours, eastbound SR 67 between Archie Moore Road and Highland Valley Road is calculated to have an existing travel time of 184.1 seconds. This would increase to 184.5 seconds with the addition of project traffic volumes. After implementation of the proposed mitigation improvements to the intersection, it is calculated that this travel time would be reduced to 176.5 seconds. This impact is considered ***less than significant*** per Guidelines 1 and 2 because the travel time would be reduced to less than what a driver experiences in the existing conditions. This improvement to a Caltrans facility is considered feasible, because

Caltrans has indicated that it agrees with the scope of the improvements, and the developer would be responsible for constructing the improvements prior to the impact occurring.

Impact TR-2a: Existing-Plus-Project Conditions, SR 67 and Highland Valley Road Intersection. As shown in Table 2.1-2, project roadway improvements would improve the SR 67 and Highland Valley Road intersection from LOS E to LOS C in the AM peak, and from LOS D to LOS B in the PM peak. These improvements would substantially reduce the delay motorists would experience at this intersection for the existing-plus-project conditions by more than 57 seconds in the AM peak and 20 seconds in the PM peak. Improvements proposed for the SR 67/Highland Valley Road intersection would improve the travel times to better-than-existing conditions. Therefore, this impact is mitigated to a ***less-than-significant*** level because LOS C and B are acceptable according to Guideline 2.

Impact TR-2b: Existing-Plus-Project Conditions, SR 67 and Archie Moore Road Intersection. A signal warrant analysis would be prepared to the satisfaction of Caltrans and the County, and improvement of the intersection would occur, if warranted. Improvements would include restriping the intersection and installation of a three-way traffic signal within the existing ROW, to the satisfaction of Caltrans and the County. The warrant or the improvements would demonstrate an acceptable LOS level (D or better) at the intersection. Therefore, any potential significant impacts at this intersection would be ***less than significant***.

Impact TR-3a: Cumulative Conditions, SR 67 between Scripps Poway Parkway and Archie Moore Road. This entire segment would require widening to a four-lane facility to bring it to an acceptable LOS in the cumulative scenario. However, payment of TIFs would mitigate cumulative impacts to segments of SR 67 in the unincorporated area because this facility is a designated TIF facility. However, the segment of SR 67 within the jurisdictional limits of the City of Poway (between Poway Road and Cloudy Moon Drive) would also require construction of four lanes through Poway, a 3.3 mile section, and lesser improvements would be insufficient. Neither Caltrans nor Poway has a funded program in place to allow the project to pay its fair share to mitigate the project's contribution to the cumulative impact. Furthermore, the Cumming Ranch project would contribute less than 3% of the traffic on this road segment, and the cumulative projects combined would contribute approximately 20% of the traffic along this roadway segment. Given the small percentage of traffic that the project would contribute, a mitigation measure requiring the project to construct additional lanes over 5.1 miles would not be proportional to the project's contribution to the impact.

Rationale: For cumulative impacts on SR 67 between Scripps Poway Parkway and Archie Moore Road, payment of TIFs would mitigate impacts to all segments of SR 67, except the

segment of SR 67 within the City of Poway. Mitigation for cumulative impacts in the segment within the jurisdictional limits of the City of Poway is infeasible because (1) it is in Poway's and Caltrans' jurisdiction, (2) neither agency has any program in place to allow the project applicant to pay a fair share to mitigate the project's contribution to the cumulative impact, and (3) requiring this project to construct additional lanes would not be proportional to the project's contribution (less than 3% of the traffic) to the cumulative impact.

The cumulative impact at SR 67 between Scripps Poway Parkway and Archie Moore Road would remain ***significant and unavoidable***.

Impact TR-3b through 10 Cumulative Conditions

These impacts would be mitigated through the TIF program adopted by the County for the Ramona community, which provides opportunity for projects to mitigate cumulative traffic impacts through the payment of fees for their fair share of an impact. The TIF program includes the impacted segments of SR 67 as a planned improvement that would be funded by developments with cumulative impacts to that roadway segment. Planned improvements would create better operating conditions and allow traffic to flow without substantial delays.

Implementation of these mitigation measures would reduce potential cumulative impacts to less than significant because the County has an overall programmatic solution that addresses existing and projected future road deficiencies in the unincorporated portion of the County.

Impact TR-3b: Cumulative conditions would degrade three street segments along SR 67 within the County (Archie Moore Road to Mussey Grade Road, Mussey Grade Road to Pala Street, and Pala Street to SR 78). Project improvements at the SR 67/Highland Valley Road intersection, combined with the TIF improvements along SR 67 and at other key intersections, would create better operating conditions, such as shorter delays at intersections and less slowing between intersections. Motorists would be able to perceive these improvements, as they would pass through the SR 67 study area corridor quicker and with less traffic congestion. Implementation of the TIF improvements to achieve acceptable operating conditions would substantially reduce segment congestion and would be readily perceptible by motorists. The cumulative impact would be reduced to ***less than significant*** per Guidelines 4 and 5.

Impact TR-4: Cumulative conditions would degrade Dye Road east of SR 67. Project improvements at the SR 67/Highland Valley Road intersection, combined with the TIF improvements along the impacted section of Dye Road, would provide readily perceivable traffic improvements along Dye Road due to better flow through the intersection with SR 67 and

improved movement along the roadway segment. The cumulative impact would be reduced to ***less than significant*** per Guidelines 4 and 5.

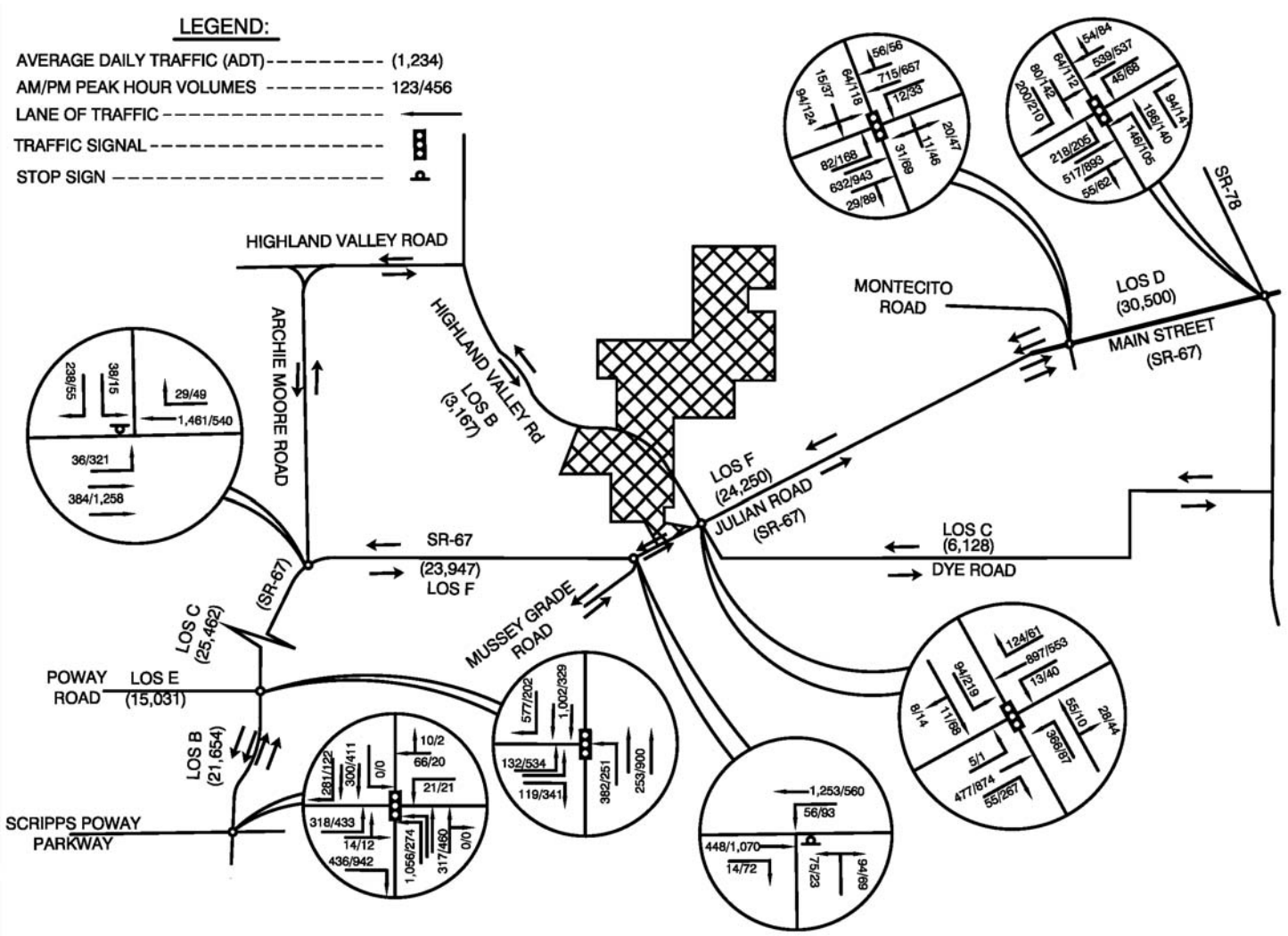
Impact TR-5: Cumulative conditions would add more than 500 vehicle trips through the SR 67/Archie Moore Road intersection in the AM peak hour, and motorists would wait approximately 1 additional minute in the AM peak and 30 seconds in the PM peak to cross through the intersection. Implementation of the TIF improvements to achieve acceptable operating conditions would substantially reduce the long delay at this intersection, and would be readily perceptible by motorists. The cumulative impact would be reduced to ***less than significant*** per Guidelines 4 and 5.

Impact TR-6: The cumulative delay increase at the SR 67/Scripps Poway Parkway intersection would be 32 seconds in the PM peak, meaning that motorists would wait approximately 30 seconds more to cross through the intersection. Implementation of the TIF improvements to achieve acceptable operating conditions would substantially reduce the long delay at this intersection, and would be readily perceptible by motorists. The cumulative impact would be reduced to ***less than significant*** per Guidelines 4 and 5.

Impact TR-7: As shown in Table 2.1-2, with the implementation of the project improvements, cumulative conditions at the SR 67/Highland Valley Road intersection would improve from LOS F to LOS C in the AM peak hour and LOS E to LOS C in the PM peak hour. As shown in Table 2.1-2, the cumulative impact would be reduced to ***less than significant*** per Guidelines 4 and 5.

Impact TR-8: The SR 67/Montecito Road intersection would operate at LOS F in the PM peak under cumulative conditions, and motorists would have to wait almost 1 additional minute to cross through the intersection. Implementation of the TIF improvements to achieve acceptable operating conditions would substantially reduce the long delay at this intersection, and would be readily perceptible by motorists. The cumulative impact would be reduced to ***less than significant*** per Guidelines 4 and 5.

Impact TR-9: The SR 67/SR 78 intersection would operate at LOS E in the PM peak under cumulative conditions, and motorists would have to wait longer to cross through the intersection in the PM. Implementation of the TIF improvements to achieve acceptable operating conditions would substantially reduce the long delay at this intersection, and would be readily perceptible by motorists. The cumulative impact would be reduced to ***less than significant*** per Guidelines 4 and 5.



Source: RCE Transportation Engineering

NORTH

NO SCALE

Figure 2.1-1
Existing Traffic Volumes

Table 2.1-1
Street Segment LOS, Existing-Plus-Project Conditions

Segment	LOS E Capacity	Existing		Existing Plus Project		
	ADT	LOS	ADT	LOS	ADT	Significant?
SR 67						
Scripps Poway Parkway to Poway Road	34,200	B	21,654	B	22,134	No
Poway Road to Archie Moore Road	34,200	C	25,462	C	26,392	No
Archie Moore Road to Mussey Grade Road	16,200	F	23,947	F	24,992	**Yes**
Mussey Grade Road to Pala Street	16,200	F	24,250	F	24,475	**Yes**
Pala Street to SR 78	37,000	D	30,500	D	30,665	No
Highland Valley Road						
West of SR 67	16,200	B	3,167	B	3,392	No
Dye Road						
East of SR 67	16,200	C	6,128	C	6,203	No

Table 2.1-2
SR 67/Highland Valley Road Intersection Operating Conditions

	Existing Plus Project				Existing Plus Cumulative			
	AM Peak		PM Peak		AM Peak		PM Peak	
	LOS	Delay	LOS	Delay	LOS	Delay	LOS	Delay
Without Project Roadway Improvements	E	79.8	D	39.7	F	147.0	E	71.5
With Project Roadway Improvements	C	21.9	B	19.4	C	29.3	C	33.0

Delays shown are average intersection delays in seconds.

Table 2.1-3
Intersection LOS, Existing-Plus-Project Conditions

	Existing				Existing Plus Project					
	AM Peak		PM Peak		AM Peak			PM Peak		
	LOS	Delay	LOS	Delay	LOS	Delay	Signifi-cant?	LOS	Delay	Signifi-cant?
Signalized										
SR 67/Scripps Poway Pkwy	C	26.0	D	46.0	C	26.7	No	D	44.7	No
SR 67/Poway Road	B	15.6	B	11.8	B	15.9	No	B	12.0	No
SR 67/Highland Valley Road	E	76.6	D	36.4	E	79.8	Yes	D	39.7	No
SR 67/Montecito Road	D	37.7	D	46.4	D	37.9	No	D	47.0	No
SR 67/SR 78	D	40.3	D	43.0	D	40.4	No	D	43.2	No
Unsignalized										
SR 67/Archie Moore Road	D	29.9	D	30.5	D	32.2	No	D	32.0	No
Highland Valley Road/Engelmann	-	-	-	-	A	9.5	No	A	9.4	No
Highland Valley Road/Cumming North	-	-	-	-	B	10.4	No	B	10.4	No
Highland Valley Road/Cumming South	-	-	-	-	A	9.5	No	A	9.5	No
Highland Valley Road/Highland Ct.	-	-	-	-	A	10.0	No	B	10.0	No

Delays shown are average intersection delays in seconds.

A dash (-) indicates that this intersection does not currently exist.

Table 2.1-4
Street Segment LOS, Cumulative Conditions

Segment	LOS E Capacity	Existing		Cumulative		
	ADT	LOS	ADT	LOS	ADT	Significant?
SR 67						
Scripps Poway Parkway to Poway Road	16,200	F	21,654	F	29,532	Yes
Poway Road to Archie Moore Road	16,200	F	25,462	F	32,862	**Yes**
Archie Moore Road to Mussey Grade Road	16,200	F	23,947	F	31,645	**Yes**
Mussey Grade Road to Pala Street	16,200	F	24,250	F	30,190	**Yes**
Pala Street to SR 78	37,000	D	30,500	E	35,800	**Yes**
Highland Valley Road						
West of SR 67	16,200	B	3,167	C	5,092	No
Dye Road						
East of SR 67	16,200	C	6,128	E	11,870	**Yes**

Table 2.1-5
Intersection LOS, Cumulative Conditions

	Existing				Cumulative					
	AM Peak		PM Peak		AM Peak			PM Peak		
	LOS	Delay	LOS	Delay	LOS	Delay	Signifi-cant?	LOS	Delay	Signifi-cant?
Signalized										
SR 67/Scripps Poway Pkwy	C	26.0	D	46.0	C	32.1	No	E	78.0	**Yes**
SR 67/Poway Road	B	15.6	B	11.8	B	18.9	No	B	12.1	No
SR 67/Highland Valley Road	E	76.6	D	36.4	F	147.0	**Yes**	E	71.5	**Yes**
SR 67/Montecito Road	D	37.7	D	46.4	D	52.6	No	F	88.5	**Yes**
SR 67/SR 78	D	40.3	D	43.0	D	46.3	No	E	61.3	**Yes**
Unsignalized										
SR 67/Archie	D	29.9	D	30.5	F	78.0	**Yes**	F	61.6	**Yes**
Highland Valley Road/Engelmann	-	-	-	-	B	10.8	No	B	10.6	No
Highland Valley Road/Cumming N.	-	-	-	-	B	12.7	No	B	12.6	No
Highland Valley Road/Cumming S.	-	-	-	-	B	10.8	No	B	10.7	No
Highland Valley Road/Highland Court	-	-	-	-	B	12.0	No	B	12.0	No

Delays shown are average intersection delays in seconds.

A dash (-) indicates that this intersection does not currently exist.

Table 2.1-6
Roadway Segment Operations with Improvements

Segment	Length (miles)	Existing (AM/PM)				Existing Plus Project (AM/PM)				Existing Plus Project – With Improvements (AM/PM)			
		Segment Travel Time (sec)	Delay (sec)	Total Travel Time (sec)	Arterial Speed (mph)	Segment Travel Time (sec)	Delay (sec)	Total Travel Time (sec)	Arterial Speed (mph)	Segment Travel Time (sec)	Delay (sec)	Total Travel Time (sec)	Arterial Speed (mph)
Westbound SR 67 – Pala Street to Archie Moore Road													
Pala to Highland Valley Road	2.0	160/ 160	35.1/ 14.3	**195.1**/ 174.3	**36.9**/ 41.3	160/ 160	42.9/ 16.0	**202.0**/ 176.0	**35.5**/ 40.9	160/ 160	21.3/ 14.3	**181.3**/ 174.3	**39.7**/ 41.3
Highland Valley Road to Archie Moore Road	2.0	160/ 160	3.8/ 0.7	163.8/ 160.7	44.0/ 44.8	160/ 160	4.3/ 0.8	164.3/ 160.8	43.8/ 44.8	160/ 160	10.8/ 0.8	170.8/ 160.8	42.2/ 44.8
Eastbound SR 67 – Pala Street to Archie Moore Road													
Pala to Highland Valley Road	2.0	160/ 160	76.2/ 59.3	236.2/ 219.3	30.5/ 32.8	160/ 160	82.1/ 60.4	242.1/ 220.4	29.7/ 32.7	160/ 160	83.4/ 66.2	243.4/ 226.2	29.6/ 31.8
Highland Valley Road to Archie Moore Road	2.0	160/ 160	15.9/ 24.1	175.9/ **184.1**	40.9/ **39.1**	160/ 160	17.2/ 24.5	177.2/ **184.5**	40.6/ **39.0**	160/ 160	17.0/ 16.5	177.0/ **176.5**	40.7/ **40.8**

2.2 Significant Irreversible Environmental Changes Resulting from Project Implementation

Section 21100(b)(2)(B) of the CEQA Statutes and Section 15126.2(c) of the CEQA Guidelines require that an EIR analyze the extent to which the proposed project's primary and secondary effects would impact the environment and commit nonrenewable resources to uses that future generations would not be able to reverse.

"Significant irreversible environmental changes" include the use of nonrenewable natural resources during the initial and continued phases of the project, should this use result in the unavailability of these resources in the future. Primary impacts and, particularly, secondary impacts, generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with projects. Irretrievable commitments of these resources are required to be evaluated in an EIR to ensure that such consumption is justified (CEQA Guidelines Section 15126.2[c]).

The first irreversible environmental change that would result from implementation of the project site would be the development of a portion of the project site from open space and agricultural use to an urbanized land use. This developed use would create changes to environmental factors such as visual resources, drainage, and traffic, which are discussed in detail in this EIR.

A second irreversible environmental change that would result from project implementation would be wildlife's limited use of the developed portions of the project site as foraging areas or movement corridors. Although development would result in these irreversible environmental changes, the Ramona Community Plan has planned developed uses for the project site as the rural area continues to grow and expand. Implementation of the Cumming Ranch project would be in line with those planning and development goals of the Ramona Community Plan (County of San Diego 2011a).

In addition, the Cumming Ranch project is not anticipated to result in irreversible damage from environmental accidents, such as an accidental spill or explosion of a hazardous material. During construction, equipment would be using various types of fuel and material classified as hazardous. In California, storage and use of hazardous substances are strictly regulated and enforced by various local, regional, and state agencies. The enforcement of these existing regulations would preclude credible significant project impacts related to environmental accidents.

The project would use minor amounts of both renewable and nonrenewable natural resources for project construction. Nonrenewable resources are those resources that cannot be replenished by natural means, including oil, natural gas, and iron ore. Nonrenewable natural resources used for project construction may include fossil fuels in the form of diesel, gasoline, or oil for construction equipment. The Cumming Ranch project would not use nonrenewable fossil fuels at a greater rate than other typical construction projects and may, in certain circumstances, use less. For instance, the project was designed to have a balanced cut/fill ratio onsite, and would not require long haul trips to import or export soil for the project, thus reducing the amount of fossil fuel consumed by project implementation. Another example of nonrenewable resource conservation during project construction would be the grading of only individual lot pads rather than a mass grading of the entire site.

Uses of nonrenewable resources during project operation would include natural gas or other fossil fuels used to provide power and heating sources to the homes. The usage of nonrenewable resources in the homes developed by the project would not be greater than in other typical homes in the San Diego region. The new residences would accommodate forecasted growth in the San Diego region, which would be expected to result in fossil fuel use if the new growth were accommodated through another project or location. In general, the proposed project would not increase the overall rate of use of any nonrenewable natural resource, or result in the substantial depletion of any nonrenewable resource.

Renewable natural resources are those resources that can be replenished by natural means, including water, lumber, and soil. Natural resources include minerals, energy, land, water, forestry, and biota. All biological impacts are discussed, and mitigated if necessary, in this EIR. Lumber and soil would be required for construction of the homes. However, as discussed above under nonrenewable resources, the homes that would result from this project would accommodate forecasted growth for the area and, if this project were not to occur, most resources would be expected to be used in a similar housing project needed to fulfill the future housing demand.

The size of the average new house is 2,324 square feet and requires more than 1,300 cubic feet of lumber and 6,000 square feet of structural panels (plywood) to construct the house. Generally, other resources used to construct a typical home include approximately 780 pounds of insulation; 300 pounds of nails and screws made of iron and zinc; 270 pounds of glass for windows and glass doors made from silica sand, limestone, and feldspar; 500 pounds of copper used for plumbing pipes and electrical wiring; 14,200 pounds of gypsum for wallboard; and other materials such as aluminum, brick, steel, and gravel (Mineral Information Institute 2001). These materials would be generally required for construction of the 125 homes on the project site.

Prior to the "housing crash" in 2008/2009, construction in San Diego County had averaged approximately 12,000 new homes per year (Building Industry Association of San Diego 2007). In 2011, there were an estimated 5,000 new units. Depending on market conditions, anywhere between 50,000 to 120,000 new homes could be constructed within the next 10 years, which is approximately the timeframe for completion and full occupation of the Cumming Ranch project. The project's contribution to the development of new homes in the San Diego region and the resources associated with that construction is minimal, between 0.002% and 0.001% for the 10-year period.

Water would also be necessary during construction and operation of the project, and for plant materials for landscaping. The native landscaping plan for the project, accompanied by the design that leaves much of the project site in its natural state, would reduce the amount of water used compared to a typical high-water-demand type of residential development.

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CHAPTER 3.0
SIGNIFICANT ENVIRONMENTAL EFFECTS OF THE PROPOSED PROJECT THAT CAN BE MITIGATED

This chapter of the EIR provides a detailed discussion of those issue areas that would result in potentially significant but mitigable impacts. For those impacts that are found to be significant, mitigation measures are included that would reduce the identified significant impact to less-than-significant levels. The topical sections in this chapter are Biological Resources, Cultural Resources, Noise, Aesthetic and Visual Quality, Climate Change, and Public Services and Recreation. Each issue area analysis follows the same format and consists of the following subsections:

- **Existing Conditions** – This section describes the existing conditions of the proposed project site at the time the NOP was issued with regard to the environmental factors reviewed.

- **Guidelines for the Determination of Significance** – This section explains how an impact is judged to be significant in this EIR.

- **Analysis of Project Effects and Determination of Significant Impact –** This section provides an analysis of potential impacts of the proposed project and explains why the impacts were found to be significant. Significant impacts are numbered to correspond with mitigation measures. Less-than-significant impacts are not numbered.

- **Cumulative Impact Analysis –** This section discusses the potential for the project to incrementally add to cumulative impacts. Analysis is provided to determine if implementation of the project would result in cumulatively considerable impacts. Significant impacts are numbered to correspond with mitigation measures. Less-than-significant impacts are not numbered.

- **Mitigation Measures –** This section identifies mitigation measures that would mitigate each impact found to be significant. Discussion is included to show why the mitigation measures fully mitigate the impact. Each mitigation measure is numbered to correspond with the associated impact. The level of significance after implementation of the mitigation measures is identified.

- **Conclusions** – This section states a conclusion as to whether each of the project's significant environmental effects to the specific subject area have or have not been reduced to below a level of significance through mitigation, and the supporting rationale for that conclusion.

3.1 Biological Resources

This section summarizes the potential onsite and offsite environmental impacts to biological resources that would result with implementation of the proposed project. This section is based on the Biological Technical Report for the Cumming Ranch project (HDR 2010), which is included in Appendix B. General biological resource surveys and vegetation community mapping were conducted on multiple visits throughout 2000 to 2004 and 2006 at the Cumming Ranch property. Several sensitive and/or potentially occurring sensitive resources were identified during those surveys. Based on the general surveys, focused surveys were conducted in 2000, 2004, 2006, and 2010, including surveys for federally and state-listed species, species considered sensitive by the County, and mapping of oak trees and jurisdictional wetland habitats. While the focused surveys were not completed within the past year, the multiple past surveys are sufficient to support the conclusions in this EIR. All focused surveys were negative for the presence of endangered species on the site, except for San Diego fairy shrimp, a vernal pool species that would not be impacted by the project. These surveys determined whether the site was likely to provide species' habitat and, where potential habitat was noted, impacts were analyzed and mitigation was identified. Based on the multiple general biological and species specific focused surveys, mitigation and design measures, such as resource management and habitat preservation, and pre-construction surveys and avoidance measures including seasonal restrictions and exclusionary fencing and monitoring have been incorporated into the project to minimize or avoid impacts to potentially occurring sensitive species. More information on the focused surveys is provided in the Biological Technical Report. Appendix C of this EIR contains the Conceptual Resource Management Plan (RMP) (TAIC 2010) and Appendix D includes the Conceptual Revegetation Plan (AECOM 2010a) for the project.

Resources were mapped and project impact areas were noted and analyzed with GIS technology. The project improvement areas shown on TM5433 RPL7 were considered impacted. For Biological Resource Reports, the County Requirements state that surveys cover the "entire project parcel(s) and habitat mapping must include land 100 feet off site." All portions of the project site were surveyed in detail. The analysis of impacts included both impacts that would occur onsite within the 236.52-acre project footprint) and for required offsite improvements (3.61 acres). Offsite project impacts are as follows:

1. Intersection improvements at Highland Valley Road and SR 67 (0.88 acre)
2. Widening of Highland Valley Road from Highland Valley Court to intersection of SR 67 (0.94 acre)
3. 30-foot-wide sewer alignment within Hardy Ranch (0.83 acre)

4. 20-foot-wide trail alignment within Hardy Ranch (0.96 acre) (a portion of the trail alignment is within the same alignment as the sewer line)

3.1.1 Discussion of Existing Conditions Relating to Biological Resources

Vegetation Communities and Habitats

Vegetation types or plant communities are assemblages of plant species that usually coexist in the same area. The classification of vegetation communities is based on the life form of the dominant species within that community and the associated flora. Figures 3.1-1a, 3.1-1b, and 3.1-1c show the locations of the vegetation communities on the Cumming Ranch site and at areas of offsite improvements (sewer lines, trails, and roadway improvements). The biological surveys found that the Cumming Ranch property supports the 15 vegetation communities discussed below.

Open Engelmann Oak Woodland

Open Engelmann oak woodland is an oak community that is restricted to the interior of the Peninsular Ranges in the low-lying hills and mesas of western Riverside and San Diego Counties. Open Engelmann oak woodland is dominated by Engelmann oak (*Quercus engelmannii*). This community occurs on the gentler, more arid slopes. The Cumming Ranch property has scattered Engelmann oaks throughout Area A. Some of these oaks occur within the agricultural area north of Highland Valley Road; others occur with a chaparral understory to the west of the central hills.

Open Coast Live Oak Woodland

Coast live oak woodland found onsite is an open-to-dense tree community with coast live oak (*Quercus agrifolia*) as the dominant overstory species and Engelmann oak as an occasional associate. This community can occur on mesic north-facing slopes and in canyon bottoms. This community is well represented in the cismontane interior valleys and foothills of the Peninsular Ranges. The Cumming Ranch property has scattered coast live oaks throughout Area A. These occur in the same areas as the Engelmann Oaks.

Valley Needlegrass Grassland

Native grasslands are communities dominated by perennial bunchgrasses such as purple needlegrass (*Nassella pulchra*), golden stars (*Bloomeria crocea* ssp. *crocea*), California blue-eyed grass (*Sisyrinchium bellum*), and rip-gut grass (*B. diandrus*). Nearly all of the native

grasslands in California have been replaced by annual grasses, a majority of which originated in the Mediterranean region. Native grasslands in California presently exist as small isolated islands. Many of these small refugia occur on atypical soils, generally fine-textured soils such as clays, where these natives may have a competitive advantage over the nonnative species. A small acreage of recovering native grassland occurs within Area C.

Southern Willow Scrub

The southern willow scrub onsite is a dense, broad-leaved, winter deciduous riparian thicket dominated by several species of willow (*Salix* sp.) in association with mule fat (*Baccharis salicifolia*). This community requires periodic flooding for its maintenance. In the absence of periodic flooding, this community would develop into a riparian woodland or forest. Southern willow scrub can be found within Area A within an unnamed drainage north of Highland Valley Road, at the northern boundary of Area B, and in the Santa Maria Creek drainage located adjacent to the southern boundary of Area C.

Mulefat Scrub

The mulefat scrub onsite is a riparian shrub community that is strongly dominated by mulefat in association with several willow species. In the absence of periodic flooding, this community would develop into a riparian woodland or forest. Mulefat scrub can be found in Area A within an unnamed drainage north of Highland Valley Road, at the northern boundary of Area B, and in the Santa Maria Creek drainage located adjacent to the southern boundary of Area C.

Cismontane Alkali Marsh

The cismontane alkali marsh found onsite is a community dominated by perennial, emergent monocots that grow in high pH soils that are saturated during most or all of the year, or in areas of dry soils with soluble mineral salts from agricultural runoff. High evaporation rates combined with low-flow levels of fresh water create high saline conditions, which are particularly prevalent during the summer months. This community occurs along ephemeral streams and floodplains. Common species onsite include yerba mansa (*Anemopsis californica*) and salt grass (*Distichlis spicata* var. *stricta*). Cismontane alkali marsh is found within the low-lying areas throughout Areas A, B, and C in association with the various drainages onsite and contains significant populations of the County-sensitive plant species southern tarplant (*Centromadia parryi* ssp. *australis*).

Vernal Pools

Vernal pools are ephemeral plant communities that support an unusual flora and fauna. This is reflected by the high number of species that are endemic (species that have a high fidelity to a certain region or habitat) to vernal pools. Vernal pools are islands, both spatially and temporally. As spatial islands they are somewhat isolated from each other by nonpool habitat, such as mima mounds and other upland plant communities. Vernal pools are also temporal islands; these hydric communities are present only during certain portions of the year (if conditions warrant).

Several topographic and edaphic conditions are prerequisites for the occurrence of vernal pools. The topography requirement is a series of microdepressions (vernal pools) and microhummocks (mima mounds). The depressions collect water from precipitation and runoff from the mima mounds. The mima mounds that surround these pools prevent runoff from the pools. The important edaphic requirement is either a subsoil hardpan or claypan, which prevents the draining of water from these pools through downward percolation. During the rainy season, vernal pools accumulate water, which eventually evaporates over the course of the dry season. With the receding pool margins, gradients of water availability and ion concentration are established from the pool periphery to the pool center. This results in the successive establishment of plant species along the receding pool margins. Species location is highly dependent on these various microenvironmental gradients.

A focused vernal pool survey was done (HDR, Appendix B to the Biological Technical Report). Some of the indicator species of the vernal pools that were identified onsite include grass poly (*Lythrum hyssopifolia*), wooly marbles (*Psilocarphus brevissimus*), and Boisduvalia sp. Other species common in the adjacent grasslands were prevalent. One vernal pool is located in the northwestern corner of Area A (Lot H open space), another vernal pool is located in the southwestern corner of Area B, and 12 vernal pools are located throughout Area C.

Nonvegetated Channel

Twelve drainages occur within the Cumming Ranch property, including the east-to-west-traversing drainages of Santa Maria Creek and Etcheverry Creek, several smaller tributaries to these creeks, isolated “waters of the U.S.,” and areas determined to only meet state and/or County RPO wetland criteria. The nonvegetated channels convey natural rain water and associated runoff, but do not necessarily occur within all drainages or may just occur within a small section of a drainage. Of the 12 drainage segments within the Cumming Ranch property, eight exhibit nonvegetated channels where the channel comprises sandy substrate that exhibits no vegetative growth or that has been scoured by a storm event.

Coastal Sage Scrub

Coastal sage scrub (CSS) is one of the major shrub-dominated (scrub) communities within California. This community occurs on xeric sites with shallow soils. CSS may be dominated by a variety of different species depending on site-specific topographic, geographic, and edaphic conditions. On site there are several recognized sub-associations of CSS based on the dominant species. Typical CSS dominants are California sagebrush, flat-top buckwheat, laurel sumac (*Malosma laurina*), white sage (*Salvia apiana*), sawtooth sumac (*Hazardia squarrousus*), and California brickellbush (*Brickellia californica*). CSS can be found within large and small patches throughout the project site in all areas. Where it occurs in larger patches, it typically exhibits a very open shrub cover. A fire burned 22 acres of sage scrub in September 2003 in the central hills of Area A. The CSS onsite is a type known as Diegan CSS (DCSS).

Granitic Southern Mixed Chaparral

Southern mixed chaparral is a diverse mixture of sclerophyllous shrubs that occurs in the foothills of San Diego County and northern Baja California. Southern mixed chaparral has a more pronounced community structure (canopy height and higher cover values) than other chaparral communities. Southern mixed chaparral typically occurs on north-facing slopes where microenvironmental conditions are more mesic. Chamise (*Adenostoma fasciculatum*) and scrub oak (*Quercus berberidifolia*) are the most dominant species onsite. Granitic southern mixed chaparral can be found within small to medium sized patches in Area A on and adjacent to the central hills and south of Highland Valley Road along the western boundary.

Granitic Chamise Chaparral

Chamise has the widest range of any chaparral shrub, and occurs in a variety of chaparral communities. Chamise chaparral is dominated, sometimes exclusively, by chamise. In some localities this community can attain high cover values and height. Although the floristic diversity of this community is low, chamise and scrub oak are the predominant species. Granitic chamise chaparral can be found within small and larger patches in Area A on and adjacent to the central hills, representing senescent populations of chamise.

Nonnative Grassland

Most of the grasslands in the coastal and foothill areas of San Diego County are dominated by exotic, annual grasses of Mediterranean origin. The Mediterranean region has a maritime climate similar to that of much of cismontane California. The Mediterranean region has a long history of

agriculture and grazing activities, and many of these introduced species are disturbance associated. Intensive grazing and agriculture, accidental and intentional species introductions, and severe droughts during the early Spanish Era allowed for the successful invasion of these exotic species and the subsequent displacement and exclusion of native grasses. Nonnative grassland occurs throughout various locations within Area A, adjacent to agricultural lands, drainages, and natural vegetation, and makes up the majority of the acreage within Area C.

Field/Pasture

The field/pastures at the project site have historically been or are currently under cultivation or used for grazing. Agricultural activities occur throughout most of Areas A and B, and cover a little more than half of the acreage onsite. These operations have been ongoing for the last 50 years, and crop production has consistently been oat-hay (*Avena sativa*). There is a clear demarcation of agricultural crop land from nonnative grassland. Even when resting between harvesting and planting, the agricultural lands continue to exhibit less than 50% cover of nonnative grasses (this does not include remnants of oat-hay). During this time, the area is grazed by cattle to reduce the standing crop cover not harvested. This further precludes the invasion of nonnative grasses from the crop lands, as they are quickly consumed by the cattle.

Eucalyptus Woodland

Two mature stands of eucalyptus woodland occur offsite on the Hardy Ranch property. Although offsite, the habitat is along the alignment of the proposed offsite sewer line and trail and, thus, is included in this section. This habitat is currently being used by cattle for shade, shelter, and limited grazing opportunities. Barn owl (*Tyto alba*), red-tail hawk (*Buteo jamaicensis*), and red-shouldered hawk (*Buteo lineatus*) have been observed perching and foraging within and adjacent to these two stands.

Disturbed and Developed Habitats

Disturbed habitats on the Cumming Ranch property include Old Highland Valley Road, which occurs north of the existing Highland Valley Road in Area A. The older section of road is in major disrepair and is showing regrowth of native and nonnative plant species. Disturbed area also includes a large brush pile that has been onsite for many years, as well as some area that may have been under agricultural use at one time in Area A. Another small area of disturbed habitat occurs in Area B adjacent to the SMWWTP and within the existing ROW. The only developed area within the project footprint is Highland Valley Road, which bisects Area A in an

east to west direction. The Highland Valley Road easement comprises a 94-foot-wide ROW. Offsite developed areas include SR 67 and Dye Road.

Wildlife

Sixty-eight animal species (vertebrates and invertebrates) were detected during the multiple biological resource surveys conducted at the Cumming Ranch property between summer 2000 and summer 2004, and in 2006 during the wetland delineation update. Animal species present onsite were identified by direct observation or signs of their presence (tracks, scat, dens, etc.). The Biological Technical Report (Appendix E to the BTR) contains the list of the animal species observed.

Wildlife Corridors

Wildlife movement corridors, also called dispersal corridors, are linear features that connect at least two significant habitat areas. Corridors and linkages are further defined by the County as a specific route that is used for movement and migration of species. A corridor may be different from a linkage because it represents a smaller or narrower avenue for movement. Linkages are areas of land that support or contribute to the long-term movement of wildlife and genetic material, including year-round foraging, reproduction, and dispersal habitat for resident plants and animals.

The viability and quality of wildlife corridors or linkages are dependent on site-specific factors. Topography and vegetative cover are important factors, and should provide cover for both predator and prey species. They should direct animals to areas of contiguous open space or resources, and away from humans and development. A wildlife corridor that supports large predator and prey animals is typically considered to be functioning at the highest of levels. Areas not considered as functional wildlife dispersal corridors or linkages are typically obstructed or isolated by concentrated development and heavily traveled roads, known as “chokepoints.” One of the worst scenarios for dispersing wildlife occurs when a large block of habitat leads animals into “cul-de-sacs” of habitat surrounded by development. These habitat “cul-de-sacs” frequently result in adverse human/animal interface.

Cumming Ranch is located at the southern edge of the Ramona grasslands. The connectivity to open space to the south is partially restricted by rural developed parcels and heavy presence of traffic along SR 67. To the southeast of Cumming Ranch, a small portion of grassland and agricultural land extends across SR 67 toward the Barnett and Monte Vista Ranch Preserves. Some of these areas to the southeast of Cumming Ranch are proposed for future development.

Connection to or from Cumming Ranch would be via Etcheverry Creek and across or under SR 67. West of Area A, rural residential developments exist with a network of dirt and paved roads and fencing around properties. Ramona grassland areas to the west and north of Areas B and C are much more open and less restrictive to potential wildlife movement. Both Etcheverry Creek and Santa Maria Creek provide linkages to these open areas to the west and northwest.

Etcheverry Creek is nearly devoid of vegetative cover and concealment, but offers a relatively deep creek bed for topographic cover. Santa Maria Creek has sparse vegetative cover in the form of oak and willow trees, with little to no substantive understory, but does offer a wide base of travel and uninhabited adjacent lands in Areas B and C, which connect to more open lands to the west and north. Corridor and linkage possibilities occur to the southeast at SR 67 for Etcheverry Creek toward the Barnett and Monte Vista Ranch Preserves. Santa Maria Creek is blocked to the east with the dense development of the Ramona Town Center.

Wildlife movement and associated dispersal corridors on the site are most directly related to medium to small predators and their associated prey (e.g., coyotes, badgers, raptors, longtail weasels, cottontails, jackrabbits, and small rodents). Small animals (e.g., reptiles, amphibians, birds, bats) use Etcheverry Creek and Santa Maria Creek as linkages within the Cumming Ranch property and to adjacent lands to the north and west. Medium sized animals (e.g., raptors, coyotes, badgers, longtail weasels, cottontails, jackrabbits, ground squirrels, and small rodents) use the two creeks as linkages and corridors where the site functions on a high level for both predator and prey species.

Large sized animals may use the creeks and suitable uplands as movement corridors, although their movement may be restricted due to the lack of concealment and thermal coverage. The site is not expected to function at a high level for large mammal movement due to the lack of significant cover; however, mule deer (*Odocoileus hemionus*) were observed moving northward in the central hills of Area A in 2004, and signs of mountain lion (*Felis concolor*) were detected along the dirt roads and trails in Area A, also in 2004.

The location of the project site within Ramona grasslands is important to note, since the grasslands offer many of the more resident raptor species prime foraging, roosting, and nesting opportunities. Many migratory species reside in the Ramona grasslands during their seasonal stay, or they will use the area as a primary stop-over point along their northern and southern routes of travel. Specifically, the project site provides foraging, roosting, and perching opportunities, with limited nesting availability. Area A mostly consists of active agriculture; however, it also supports ridgelines, rock outcrops, trees, and shrub lands that function as raptor perch and nesting areas, with foraging opportunities throughout the rest of the area. Area B is currently under cultivation

and provides a raptor prey base. Dry farming does not substantially diminish the land value for raptor foraging. Area C is currently high-quality raptor habitat for a variety of species.

Sensitive Biological Resources

Sensitive Vegetation Communities

The County's RPO defines "sensitive habitat lands" as follows:

> "Land which supports unique vegetation communities, or the habitats of rare or endangered species or sub-species of animals or plants as defined by Section 15380 of the State of California Environmental Quality Act (CEQA) Guidelines (14 Cal. Admin. Code Section 15000 et seq.), including the area which is necessary to support a viable population of any of the above species in perpetuity, or which is critical to the proper functioning of a balanced natural ecosystem, or which serves as a functioning wildlife corridor."

Under the above definition, the specific vegetation communities present at the Cumming Ranch site that meet the criteria of sensitive habitat lands include southern willow scrub, mulefat scrub, non-agricultural areas of cismontane alkali marsh, vernal pools, CSS, and grassland habitats that are of good quality and suitable for occupation by associated sensitive species known from the Ramona grasslands area. Lands contributing to the Ramona grasslands or linkages would also qualify as sensitive habitat lands.

Jurisdictional Wetlands and Waters

Wetland and riparian communities generally are considered sensitive due to their rarity, decline due to urban development, and the number of sensitive species dependent on them. Activities within wetlands, most open water bodies, and ephemeral or perennial streams are regulated by CDFG and ACOE. Wetlands and nonwetland "waters of the U.S." are covered under the jurisdiction of the ACOE's Section 404 permit process if those areas connect to navigable waters as defined by ACOE. The Clean Water Act (CWA) permit provisions regulating dredge and fill operations are enforced by ACOE and the U.S. Environmental Protection Agency (USEPA), often with technical input from USFWS. Wetlands are also specifically addressed by California Fish and Game Code Sections 1600–1606 (Streambed Alteration Agreement). Vernal pools are considered wetlands under the County RPO. Some vernal pools are also regulated by the Endangered Species Act, depending on the presence of sensitive species.

A wetland delineation was performed between February 17 and March 5, 2004, prior to the completion of project design. The wetland delineation was updated in February 2006 to provide specific locations and boundaries of federal, state, and County jurisdictional wetlands and waters in Areas A and B, and off site at the Hardy Ranch, for project planning and designing purposes. The details of the 2004 and 2006 delineations are provided as an appendix to the Biological Technical Report (BTR, Appendix A). The amount of federal ACOE and CDFG jurisdictional waters of the U.S. and County-defined wetlands within the project study area is summarized in Tables 3.1-1 through 3.1-3. Within the Cumming Ranch boundaries, there is 4.29 acres of ACOE jurisdictional and/or regulated water and wetlands, 55.73 acres of CDFG jurisdictional wetlands, and 64.13 acres of County RPO wetlands.

Sensitive Plants

Sensitive plants include those listed by USFWS or CDFG; or are candidates for listing; and/or are considered sensitive by CDFG, the County, and/or the California Native Plant Society (CNPS).

Sensitive plant species surveys were conducted during the appropriate times of year throughout the spring and summer months between 2000 and 2004. In addition, a comprehensive oak tree inventory was conducted in 2004. Through these surveys, the following three sensitive plant species were identified on the Cumming Ranch property: Engelmann oak, southern tarplant (*Centromadia parryi* ssp. *australis*), and spreading navarretia (*Navarretia fossalis*). These sensitive species are described in detail below.

Seven additional County sensitive plant species may have the potential to occur within or adjacent to the property (see BTR, Appendix B): Orcutt's brodiaea (*Brodiaea orcuttii*), San Diego goldenstar (*Muilla clevelandii*), little mousetail (*Myosurus minimus* ssp. *apus*), graceful tarplant (*Holocarpha virgata elongata*), Coulter's saltbush (*Atriplex coulteri*), Parish's brittlescale (*Atriplex parishii*), and vernal barley (*Hordeum intercedens*). Although focused surveys were conducted for these species over three field seasons, they were not identified onsite.

Engelmann Oak

Thirty Engelmann oak trees occur on the Cumming Ranch property within the open Engelmann oak woodland and within scattered locations throughout Area A. All oak trees were identified through a complete tree inventory in 2004. There are also 30 coast live oak trees and 41 oak hybrids. Engelmann oak is considered a County sensitive plant species (Group D) and is a CNPS

List 4 species. The Ramona Community Plan identifies oaks as an important element of the rural character of the community.

Southern Tarplant

Southern tarplant occurs on approximately 24 acres of the Cumming Ranch property within low-lying areas throughout Areas A, B, and C, and off site at the Hardy Ranch. It is estimated that approximately 33,200 plants occur on 8.4 acres within Area A; 63,000 plants occur on 15.6 acres in Area B; and 250 plants occur on 0.1 acre in Area C. It is known that this plant species occurs in a number of additional sites within Ramona that exhibit similar topography, hydrology, and soils. It is unknown, however, what the population levels may be at this time, since many of these populations are located on privately held lands. Southern tarplant is considered a sensitive plant species (Group A) by the County and is considered rare by CNPS (List 1B).

Spreading Navarretia

Spreading navarretia occurs in Area C (Ramona Vernal Pool Preserve) within Vernal Pool E5. This plant species is federally listed as threatened, is a County sensitive plant species (Group A), and is considered rare by CNPS (List 1B). USFWS announced on October 7, 2010, a revised final rule designating approximately 6,720 acres of land in portions of Los Angeles, Riverside, and San Diego Counties as critical habitat for spreading navarretia (USFWS 2010). This critical habitat area overlaps with the northern portion of Area C within the project site. None is in or near impact areas.

Sensitive Animals

Sensitive animals are species or subspecies that are listed as threatened or endangered, or are being evaluated (proposed) for listing by USFWS or CDFG, and/or are considered sensitive by CDFG or the County. Sensitive zoological resource surveys were conducted on the Cumming Ranch property between 2000 and 2010, and included wet season collection and analysis of fairy shrimp in all vernal pools, Quino checkerspot butterfly (*Euphydryas editha quino*) habitat assessments and focused surveys, breeding season arroyo southwestern toad (*Bufo microscaphus californicus*) surveys, breeding season coastal California gnatcatcher (*Polioptila californica californica*) surveys, Stephens' kangaroo rat (*Dipodomys stephensi*) above-ground assessments and trapping surveys, golden eagle (*Aquila chrysaetos*) habitat assessments and surveys, white-tailed kite (*Elanus leucurus*) habitat assessments and surveys, and focused herpetofauna and raptor surveys. Sensitive species identified at the Cumming Ranch site are summarized in Table 3.1-4 and are described in the following sections.

San Diego Fairy Shrimp

A comprehensive vernal pool botanical and fairy shrimp survey was conducted in Areas A, B, and C between December 18, 2002, and June 14, 2003. Additional sampling was conducted on March 4, 2004, and those results were provided for inclusion in the Ramona Vernal Pool Preserve 2004 Botanical and Fairy Shrimp Survey Results Report (USFWS protocol) (Appendix A to the BTR, 2005). A portion of the Area C vernal pools contained the endangered San Diego fairy shrimp. The Area A satellite vernal pool was found to contain San Diego fairy shrimp; however, the pool does not support vernal pool obligate species such as wooly marbles, or other expected vernal pool endemic species. The satellite vernal pool in Area B was negative for the presence of San Diego fairy shrimp. Three additional pools were sampled immediately off site (to the northwest) on the Hardy Ranch, and San Diego fairy shrimp were also located within these pools.

Quino Checkerspot Butterfly

Habitat assessments for Quino checkerspot butterfly were conducted in May 2001, and focused surveys were performed in February, March, and April 2004. Focused surveys for Quino checkerspot butterfly were conducted for Areas A and B, as well as a 2-acre site within the northwest corner of Area C (for the proposed community trail staging area) and a linear survey of the proposed offsite sewer and trail alignment within Hardy Ranch. Appropriate habitat and host plants were identified in the northwest corner of Area C within the proposed open space, but no Quino checkerspot butterflies or their larvae were observed. Because of the limited distribution of dot plantain on the site, species records absent for of the butterfly being in the vicinity, much of the site being unsuitable for species occupation (in cultivation or closed canopy shrubland), and that the site is not in the USFWS-designated 'Survey Area,' there is an extremely low potential for this species to utilize this site.

Arroyo Southwestern Toad

Arroyo (southwestern) toad surveys (USFWS protocol) were conducted during the breeding season between May 16 and June 20, 2001, April 29 and June 11, 2004, and June 21 and June 22, 2010. No arroyo toads were observed; however, suitable habitat is present. The habitats on the Cumming Ranch property are considered marginal due to lack of appropriate streambed substrate for breeding, presence of dense grass that makes movement difficult, agricultural activities that could conflict with foraging and winter hibernation, the presence of urban runoff and other pollutants within the creeks and watersheds, and the filling in of Santa Maria Creek with siltation and gravel/sand from upstream.

Coastal California Gnatcatcher

Coastal California gnatcatcher breeding season surveys (USFWS protocol) were conducted between May 14 and June 18, 2001, March 26 and April 16, 2004, and June 8 and June 22, 2010, within appropriate CSS habitat in Areas A and B (approximately 90 acres). No coastal California gnatcatchers were detected during these surveys. In intervening and subsequent visits to Cumming Ranch, there have been no incidental sightings of coastal California gnatcatcher within appropriate CSS habitat.

Stephens' Kangaroo Rat

Stephens' kangaroo rat surveys (USFWS protocol) were conducted between August 20 and 25, 2000, and between February 16 and 19, 2004. Trapping areas were established within Areas A and B based on sparse kangaroo rat sign and appropriate soils. No Stephens' kangaroo rat were trapped. An evaluation in 2010 of the potential for species occupation on the project site concluded that suitable habitat does not exist onsite (O'Farrell Biological Consulting 2010).

Burrowing Owl

All field surveys from 2000 through 2010 included scanning potential perches and searching the ground for evidence of burrowing owl (*Athene cunicularia hypugea*), but none were detected onsite. However, suitable habitat for the burrowing owl is present.

Herpetofauna

Focused herpetofauna surveys were conducted during the same survey period as for the arroyo toad, as described above. The following seven County sensitive herpetological species were identified onsite within Area A and are described below: western spadefoot toad (*Scaphiopus hammondii*), coast horned lizard (*Phrynosoma coronatum*), granite spiny lizard (*Sceloporus orcutti*), granite night lizard (*Xantusia henshawi*), California whiptail (*Cnemidophorus tigris mundus*), orange-throated whiptail (*Cnemidophorus hyperythrus*), and two-striped garter snake (*Thamnophis hammondii*).

Western Spadefoot Toad

Western spadefoot toad is typically found in CSS, chaparral, and grasslands habitats, but is most common in grasslands with vernal pools or mixed grassland/CSS. The highest concentrations of spadefoot toad were found within and adjacent to Etcheverry Creek and within the Area C vernal

pools and associated drainages. Postbreeding spadefoot toad were located within and adjacent to CSS, chaparral, grassland, and agricultural lands in Areas A and B. During the peak of the 2001 survey season, approximately five adult western spadefoot toads were found throughout Area A north of Highland Valley Road; approximately 30 adult western spadefoot toads were identified in a single location on Etcheverry Creek, with two more observed in Santa Maria Creek within Area B; and approximately 10 adult western spadefoot toads were observed in Area C. The population onsite may vary from year to year due to climatic conditions and grazing; however, without focused pit-fall trapping and above-ground counts, the population of western spadefoot toad on the Cumming Ranch project site cannot be ascertained.

San Diego Horned Lizard

San Diego horned lizards are found within a variety of vegetation types, including CSS, annual grassland, chaparral, oak woodland, riparian woodland, and coniferous forest. In inland areas such as Ramona, this species is restricted to areas with pockets of open microhabitat created by disturbance (i.e., floods, fire, roads, grazed areas, fire breaks). The San Diego horned lizard was observed in sandy soils near Etcheverry Creek within Area B. Appropriate winter hibernation and summer estivation sites occur within Areas A and B, outside of active agriculture. Area C may not support the San Diego horned lizard due to the presence of heavy thatch and limited foraging opportunities. The population of San Diego horned lizard on the Cumming Ranch property is unknown at this time, but, based on observations of harvester ant colony locations and individual sightings of horned lizard (approximately two individuals), it may be determined that the overall population of this species is very low.

Granite Spiny Lizard

Granite spiny lizards are found within a variety of chaparral, CSS, riparian, and forest habitats, with boulders and rock outcrops as a key component. Two granite spiny lizards were found within rock outcrops in Area A. However, it is estimated that more may occur within other rock outcrop sites in Areas A and B. The overall population of granite spiny lizards is unknown at this time. Since they may live in family/colonial groups or as individuals, it would be difficult to estimate their population onsite without focused pit-fall trapping data.

Granite Night Lizard

This locally common but patchily distributed nocturnal lizard is found exclusively in areas of massive rocks, rock outcrops, and flaking granite in a variety of desert, chaparral, and woodland habitats. It may use grasslands and other habitats between suitable rock outcrops for movement.

Granite night lizards were found within the cracks of large rocks/boulders in rock outcrop habitats located in or near Etcheverry Creek in Areas A and B. Granite night lizards were also found within rock outcrops associated with drainages and upland vegetation communities at another location in Area A. Since only single adults were observed, it is unknown what the overall population of granite night lizard is at this time on the Cumming Ranch property.

Coastal California Whiptail Lizard

Coastal California whiptail lizards can be found in open, often rocky areas with little vegetation or within sunny microhabitats within shrub or grassland associations, as well as in riparian habitats. Foraging and cover requirements are met within the understory of the shrub communities, whereas thermoregulation requirements are met and burrows are typically found within open and/or rocky areas. Thirteen coastal California whiptails were found throughout Area A in open- and closed-canopied CSS and southern mixed chaparral habitats in association with rock outcrops. Since only single adults were observed, it is unknown what the overall population of coastal whiptails is at this time on the Cumming Ranch property.

California Orange-Throated Whiptail Lizard

California orange-throated whiptail lizard can be found within a variety of habitats, including chaparral, CSS, nonnative grassland, and oak woodlands. Areas with California buckwheat and flattop buckwheat in association with California sage brush, black sage, and white sage are an important indicator of this species' presence. Dispersal of sub-adults and adults may be precluded by urbanization and agriculture development. Three orange-throated whiptails were found within associated upland habitat (CSS) within Area A. Since only single adults were observed, it is unknown what the overall population of orange-throated whiptails is at this time on the Cumming Ranch property.

Two-Striped Garter Snake

Two-striped garter snake is considered one of the most aquatic of garter snakes, and is typically associated with wetland habitats such as streams, creeks, and pools, and, more specifically, with ponds, lakes, wetlands, and vernal pools. It has also been found within mixed oak woodlands and chaparral on coastal slopes of mountains and foothills to sea level. Two-striped garter snakes were found exclusively adjacent to and within two locations of the Etcheverry Creek drainage within Area B during the 2004 arroyo toad surveys. It should be noted that, at that time, the creek area had not been grazed by cattle, and the cover of grasses was high. As of 2006, the area had been grazed heavily by cattle, and cover has been reduced, thereby potentially precluding the

presence of garter snakes. It can be assumed that the presence of two-striped garter snake will be dependent on sufficient cover and availability of flowing or ponded water. The current overall population of two-striped garter snake on the Cumming Ranch property is unknown.

Birds and Raptors

Raptors are defined as birds of prey and are protected by the Migratory Bird Treaty Act (MBTA) (16 U.S. Code 703–711). Several of these species have been observed using the Cumming Ranch property for various life functions (foraging, roosting, and nesting). County-sensitive raptors observed onsite include turkey vulture (*Cathartes aura*), white-tailed kite, northern harrier (*Circus cyaneus*), golden eagle, Cooper's hawk (*Accipiter cooperi*), red-shouldered hawk, and ferruginous hawk (*Buteo regalis*). In addition to the above-listed raptors, the loggerhead shrike (*Lanius ludovicianus*) (County-sensitive avian species) was also observed onsite. Also, Canada geese (*Branta Canadensis*) have been observed onsite, and are classified as waterfowl and protected by the MBTA. These sensitive species are discussed individually below.

Additional raptor species observed onsite include great horned owl (*Bubo virginianus*), zone-tailed hawk (*Buteo albonotatus*), red-tail hawk, rough-legged hawk (*Buteo lagopus*), American kestrel (*Falco sparverius*), and barn owl. An additional nine species have been observed within the Ramona vicinity by various professionals and amateur birders: osprey (*Pandion haliaetus*), bald eagle (*Haliaeetus leucocephalus*), sharp-shinned hawk (*Accipiter striatus*), Harris's hawk (*Parabuteo unicinctus*), Swainson's hawk (*Buteo swainsoni*), merlin (*Falco columbarius*), prairie falcon (*Falco mexicanus*), peregrine falcon (*Falco peregrinus*), and burrowing owl. Of these nine species, the burrowing owl is the most likely to inhabit the project site, as suitable habitat is present, although burrowing owl has not been observed onsite and bald eagle has been observed foraging on the site in 2012.

Two additional County-sensitive avian species, grasshopper sparrow (*Ammodramus savannarum*) and horned lark (*Eremophila alpestris actis*), may have the potential to occur within or adjacent to the proposed project site. Although focused surveys were conducted for these species over four field seasons, they were not identified onsite.

Turkey Vulture

Turkey vultures are one of North America's largest birds, having a wingspan of 6 feet. The turkey vulture is most commonly observed in desert regions, farmlands, and grasslands where human presence is more scattered. Although they are not a suburban bird, they will take advantage of road-killed animals and other carrion within rural and suburban areas. Turkey

vultures have been observed flying over the Cumming Ranch property. There are no new or historic roosts onsite, nor does nesting occur onsite, since the appropriate substrate is not readily available (i.e., rock crevices, hollow trees, caves, fallen hollow logs, or ledges).

White-Tailed Kite

White-tailed kites inhabit low-elevation open grasslands, savannah-like habitats, agricultural areas, wetlands, and oak woodlands. Riparian areas adjacent to open areas are also used. They prefer to forage in undisturbed open grasslands, meadows, farmlands, emergent wetlands, ungrazed grasslands, fence rows, and irrigation ditches adjacent to grazed lands. They will communally roost in the nonbreeding season throughout various locales within San Diego County. White-tailed kites have been observed foraging at Cumming Ranch in the spring and summer; however, they may use the property in the winter, as well, depending on locales of winter roosts. White-tailed kites are not known to nest or winter roost at the Cumming Ranch property. In 2011, a study was conducted to evaluate potential impacts to raptor foraging habitat. The effort specifically included a survey and habitat assessment for white-tailed kite, including literature review and field observations. This report is attached as Appendix P to this document.

Northern Harrier

Northern harriers (also known as marsh hawks) are migratory bird species that can be found within open areas consisting of grasslands, shrublands, marshlands, agricultural fields, meadows, and coastal and inland areas. In Southern California they may breed and/or over-winter, and will often roost communally on the ground in winter, fanning out during the day to hunt small mammals and birds. Northern harriers have been observed foraging in winter and spring within Area C at Cumming Ranch. Area C has the only appropriate habitat for foraging, and could possibly be used for nesting, although no nests have ever been encountered in Area C. Foraging could also occur in Area A near the central hills where the shrublands and grasslands/agriculture meet. The suspension of agricultural activities in Area B would increase the available foraging and nesting area for northern harriers.

Golden Eagle

Golden eagles are one of North America's largest birds, with wing-spans of 6 feet, and generally occur in open country such as tundra, open coniferous forest, desert, and especially in hills and mountainous regions. Nesting is primarily restricted to rugged, mountainous areas and secluded cliffs with overhanging ledges and large trees for cover. Golden eagles are sparsely distributed throughout most of California, occupying primarily mountain and desert habitats. Approximately

500 breeding pairs are estimated to nest in California. Although golden eagles typically avoid developed areas, there are several records of golden eagle nesting sites within San Diego County near rural communities. Nest sites near the Cumming Ranch property are located in Bandy Canyon to the west, Iron Mountain to the south, Eagle Peak (Palomar Mountain) to the north, and Vulcan Mountain to the east. Golden eagles have been observed perching near the top of the central hills in Area A and foraging over the open areas of the property. In 2011, a study was conducted to evaluate potential impacts to raptor foraging habitat. The effort specifically included a survey and habitat assessment for the golden eagle, including literature review and field observations. This report is attached as Appendix P to this document. One golden eagle was observed foraging in the study area at the time that surveys were conducted (TAIC 2011).

A local resident reported observing a pair of bald eagle foraging on the project site (Wisman, 2012). Occasional foraging by bald eagle is not unusual in the Ramona Grasslands. However, this pair of birds is constructing a nest in a tree near Rangeland Road (more than 6,500 feet west of the project site). It is not known if nesting will be successful, but it is the first attempt known for this area (winter 2012). Usually, bald eagles nest in large trees within a quarter-mile from major lakes for access to their preferred food source (fish and waterfowl). Therefore, the Ramona Grassland nest is unusual as it 6 miles to Lake Poway and 6.1 miles to San Vicente Reservoir. Generally, bald eagles tend to be more adaptable to humans than golden eagles and would be less affected by development and populated areas when selecting foraging areas (Schaefer, personal communication, 2012). Cumming Ranch open space areas would offer similar foraging opportunities to bald eagles as it does to golden eagles (birds, mice, and medium sized mammals). Bald eagles are not “listed” but are considered sensitive with the same protections as golden eagles under the Eagle Protection Act of 1940.

Cooper’s Hawk

Cooper’s hawk is a crow-sized accipiter that can be found within mixed forests and open woodlands throughout the United States, southern Canada, Mexico, and South America. They are migratory, but winter across most of the United States. Cooper’s hawk primarily hunts songbirds and is commonly seen in suburban backyards near active bird feeders. They will also prey on small rodents and mammals during daylight hours. Cooper’s hawks have not been observed directly at the Cumming Ranch property, but have been detected within the adjacent eucalyptus groves on the 70-acre Hardy Ranch. They may forage at Cumming Ranch within the shrubland component in Areas A and B.

Red-Shouldered Hawk

Red-shouldered hawks are migratory in the northern portions of their range and resident within Southern California. They typically inhabit mature deciduous or mixed deciduous-conifer forests and swamps. They prefer dead trees nearby where they can perch for foraging opportunities and territory. They will often use the same nest from year to year, refurbishing it each spring. Red-shouldered hawks are solitary and territorial, and do not form flocks or communally roost as other raptors do in the winter. Red-shouldered hawks have not been observed directly at the Cumming Ranch site, but have been detected within the adjacent eucalyptus groves on Hardy Ranch. They may forage at Cumming Ranch within the adjacent habitats in Areas A, B, and C.

Ferruginous Hawk

Ferruginous hawks are migratory and will over-winter in Southern California between September and April. They are found within open grasslands and foothills, open fields, agricultural areas, sagebrush flats, desert scrub, and fringes of pinyon-juniper habitats. They roost in open areas, usually in a lone tree or on a utility pole. There are no breeding records of ferruginous hawks within Southern California. This species, along with other raptors, has been shown to co-exist in urban and suburban open space grasslands. In winter, they are behaviorally flexible and tolerant of human disturbance and alteration of landscapes, as long as prey populations persist. The only communal over-wintering roosting site within San Diego County is located within the Warner Springs area. A solitary ferruginous hawk was observed in late April and early May 2004 just outside of Area A near the western boundary in a tall western sycamore tree.

Loggerhead Shrikes

Loggerhead shrikes are a small Southern California resident bird that typically inhabits and forages within open landscapes characterized by open shrub lands, agriculture, grasslands, deserts, savannahs, prairies, and some suburban areas. They favor foraging areas that have fence lines and utility lines and poles for perching. They hunt for a wide variety of live food items that include large insects, small mammals, amphibians, reptiles, fish, and invertebrates, and use impaling as a means of handling prey. In agricultural and pasture lands they will impale their prey items on barbed wire fencing. A single loggerhead shrike was observed flying southward through the Cumming Ranch property during the February 2006 wetland delineation update effort. This adult individual was first observed flying south from Etcheverry Creek toward the south side of the central hills in Area A, where it stopped momentarily to rest in open sage scrub before continuing southward. Based on this bird's behavior, it may be determined that this

individual was traveling from one area to another and using Cumming Ranch as a travel corridor. This species has not been found to nest on the Cumming Ranch site, and this was the first observation of loggerhead shrike on the property in the past 9 years.

Canada Geese

Canada geese are classified as waterfowl and are protected by the MBTA. Canada geese are found throughout North America. Canada geese nest in Northern California and migrate south in the winter to Southern California. They are typically found in areas that support large expanses of irrigated grass such as those found in city parks, golf courses, airports, and any other such green areas; native and nonnative grasslands; and agricultural fields in association with ponds, lakes, and riparian systems. When on land, Canada geese eat a variety of grasses, including Bermuda grass, salt grass, and wild barley. They also eat wheat, beans, rice, and corn. A small flock of Canada geese was observed foraging near the northeastern corner of Area B in February 2006.

Mammals

Five County-sensitive mammals and/or signs of them have been identified onsite at various locations within or adjacent to the Cumming Ranch property: mountain lion, American badger (*Taxidea taxus*), San Diego desert woodrat (*Neotoma lepida intermedia*), San Diego blacktail jackrabbit (*Lepus californicus bennettii*), and southern mule deer.

Mountain Lion

Mountain lions are large predatory animals that inhabit a variety of habitats within California. These include shrublands, woodlands, riparian areas, and grasslands in combination with rocky areas, cliffs, and ledges. Mountain lions are generally active around sunset and sunrise. Since the occurrence of the Cedar and Paradise Fires in October/November 2003, the presence of mountain lion in new locations and in unlikely areas (i.e., residential neighborhoods) has increased. Mountain lion scat and tracks were found within Area A along and adjacent to the existing dirt roads and trails, and were found in two locations. It is assumed that this species is using the site for dispersal and hunting. However, due to the limited available cover, lack of appropriate denning habitat, and limited preferred prey base (mule deer), the Cumming Ranch property would not support a resident mountain lion. In addition, no appropriate den sites occur on the Cumming Ranch site. No new signs of mountain lion were observed during the February 2006 wetland delineation update.

American Badger

American badgers are medium-sized carnivores that feed on ground squirrels, cottontail rabbits, jackrabbits, small rodents, pocket gophers, snakes, birds, and insects within associated dry, open, treeless regions, prairies, parklands, grasslands, and cold desert areas. Badgers are fossorial animals (burrowing) that live in dens. Two badgers were observed onsite within Area B, immediately south of Etcheverry Creek within a group of rock outcrops. One adult and one sub-adult were observed during the arroyo toad surveys in 2004. Given this species' enormous territory size, it is unlikely that another resident badger would occur on the Cumming Ranch property. Based on current knowledge of this species, it is expected that the juvenile dispersed in the fall season to an area outside of its mother's home range. It is assumed that this animal would have dispersed to the less populated areas north and/or west of the Cumming Ranch property.

San Diego Desert Woodrat

The San Diego desert woodrat is a nocturnal small rodent that prefers rock outcrops and shrub cover. This species is typically located within rock outcrops in shrubland and woodland habitat. Woodrats build their nests primarily out of sticks and other materials such as cactus, dried cattle or horse manure, bones, seedpods, nails, and any other appealing or seemingly useful object. San Diego desert woodrat nests were observed within Area A in the large central hills and adjacent to the unnamed swale north of Highland Valley Road within rock outcrops. There are at least eight nest locations within Area A, and possibly more that have not yet been detected. Additional San Diego desert woodrats may be present within the various rock outcrops located throughout the southern portion of Areas A and B.

San Diego Black-Tailed Jackrabbit

San Diego black-tailed jackrabbits are crepuscular to nocturnal mammals that are found within arid regions of the western United States in association with grasslands, shrublands, and agricultural lands. Black-tailed jackrabbits eat a variety of plants, but particularly consume native and nonnative grasses, forbs, shrubs, and cultivated crops such as oat, wheat, and barley. Black-tailed jackrabbits were observed in four locations onsite within the central hills of Area A over the last 4 years. The population seems to be stable given their continued presence onsite and the availability of resources for cover and foraging. The future cessation of agricultural activities within Area B would largely increase this species' ability to persist onsite, increase their population, and open up new areas to disperse into. Due to the wide range of variances in biotic and abiotic conditions on a yearly basis, and shifting distributions and densities due to food resources, estimating population densities is difficult.

Southern Mule Deer

The southern mule deer is a subspecies of deer that only occurs within extreme Southern California and into the northern one-third of the Baja Peninsula. In Southern California, they are frequently found in chaparral and oak woodland associations, as well as within desert regions. In San Diego County, they are found within shrub land (chaparral) and oak and pine woodland habitat associations with grassy openings, where their preferred food sources occur (shrubs of all varieties may be consumed). Depending on resource availability, mule deer will typically stay within one location where food, cover, thermal, hiding, and escape resources may be of high quality and quantity. Three mule deer were observed moving northward in the central hills of Area A during early June 2004. This was the first sighting of mule deer onsite. Like the mountain lion, mule deer have probably used the Cumming Ranch property for dispersal to new areas due to the loss of appropriate habitat from the Cedar and Paradise Fires. The Cumming Ranch property is most likely being used as a movement corridor since the lack of large blocks of upland habitat and oak woodland onsite will preclude the mule deer from becoming a resident species. Mule deer or associated signs (tracks and pellet groups) were not observed during the February 2006 wetland delineation update.

Applicable Regulations and Plans

Several federal and state regulations apply or provide guidance to the proposed project when considering biological resources. This section provides a regulatory overview of the requirements for projects with potential impacts to sensitive resources, including sensitive habitats, endangered and threatened species, and wetlands and waters.

Federal Endangered Species Act

Under the Federal Endangered Species Act (FESA), "take" (defined as hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill) of listed species is prohibited unless authorized by USFWS. If a project has the potential to take a listed species, consultation with USFWS would be required, pursuant to Section 7 or Section 10A of the FESA, to determine if the project would jeopardize the continued existence of any of these federally regulated species. As part of the consultation process, a Biological Assessment would be submitted, outlining the potential impacts to federally listed, proposed, and candidate species, and proposing the reasonable and prudent measures to avoid or minimize potential take of these species. USFWS would issue a Biological Opinion (BO) to document the effects of the proposed project on the long-term viability of the species affected and any incidental take provisions. The BO can allow the "incidental take," or establish "jeopardy" and disallow any "take." Although habitat

indicators and two previous protocol surveys indicate absence of federally listed endangered arroyo (southwestern) toad and Stephens' kangaroo rat in the project development area, preconstruction surveys would be required for habitat that may be impacted, as determined by the project biologist. If it is determined that arroyo toad or kangaroo rat is present in the project development area, then an FESA take permit would be obtained. The consultation process and the requirement to incorporate reasonable and prudent measures to avoid or minimize impacts could also include additional compensation in the form of dedication of open space easements over suitable or enhanced habitat in Areas B and/or C as a condition of the FESA take permit.

There are no known arroyo toad breeding sites within the project's portion of the Santa Maria or Etcheverry Creeks, but critical habitat is designated on the site and surrounding area. The closest recorded breeding site is on the Santa Maria Creek, 10,000 feet west of the project boundary. Although unlikely to occur, if this species is found to be present, FESA would apply, and the mitigation outlined above would reduce impacts to less than significant.

Stephens' kangaroo rat is known to occupy open friable soils (Fallbrook and Vista Series) of western Ramona, and, specifically, areas several thousand feet to the west and to the north of the northern project boundary. The project development area in the southern portion of the site is separated from the known Stephens' kangaroo rat habitat by Areas A and B that have clay soil (Bosanko, Placentia, and Bonsall-Fallbrook Series) and historic and ongoing hay cultivation (Area B). Stephens' kangaroo rat distribution was considered "precluded" from the project area (O'Farrell 2010) because the project's clay soils are not suitable habitat, and the ongoing cultivation resulted in a vegetation thatch barrier that prohibits kangaroo rat from crossing into the site. Although unlikely to occur, if this species is found to be present, FESA would apply, and the mitigation outlined above would reduce impacts to less than significant.

For the federally listed endangered Quino checkerspot butterfly and San Diego fairy shrimp, there is no potential for project impacts because there is no potential habitat within the project footprint. For federally listed threatened California gnatcatcher, the NCCP is a Section 10A Habitat Conservation Plan and covers incidental take (by obtaining a Habitat Loss Permit). Also refer to Section 3.1.3 and Table 3.1-2 for more information on endangered species.

Migratory Bird Treaty Act

The MBTA restricts killing, taking, collecting, and selling or purchasing native bird species or their parts, nests, or eggs. Certain gamebird species are allowed to be hunted for specific periods, as determined by federal and state governments. The intent of the MBTA is to eliminate any commercial market for migratory birds, feathers, or bird parts, especially for eagles and other

birds of prey. Although no permit is issued under the MBTA, if vegetation removal within the project area occurs during the breeding season for raptors and migratory birds (February 15 through September 15), surveys would be conducted to locate active nests within the construction area. If active raptor or migratory bird nests are detected, project activities may be temporarily curtailed or halted.

The MBTA is relevant to the project because migratory bird species, such as Cooper's hawk and white-tailed kite, are known to the project site, and are covered by the MBTA. Potential impacts to bird species protected under the MBTA are analyzed in Section 3.1.3.

Bald and Golden Eagle Protection Act of 1940

The Federal Bald and Golden Eagle Protection Act of 1940 provides for protection of the golden eagle nationwide by prohibiting the taking of eagles, including their parts, nests, or eggs. The act defines "take" as "pursue, shoot, shoot at, poison, wound, kill, capture, trap, collect, molest, or disturb."

The Bald and Golden Eagle Protection Act is relevant to the project because bald and golden eagles have been observed using a portion of the project site for foraging. The definition in the act most relevant to this project is "disturb." For the purposes of this act, the term "disturb" is defined as "to agitate or bother a bald or golden eagle to a degree that causes, or is likely to cause, based on the best scientific information available, (1) injury to an eagle; (2) a decrease in its productivity by substantially interfering with normal breeding, feeding, or sheltering behavior; or (3) nest abandonment by substantially interfering with normal breeding, feeding, or sheltering behavior" (Federal Register, September 11, 2009).

Section 404 of the Clean Water Act

Pursuant to Section 404 of the CWA, ACOE regulates the discharge of dredged or fill material into "waters of the U.S." Waters of the U.S. are defined as follows:

> (1) all waters which are currently used, or were used in the past, or may be susceptible to use in interstate or foreign commerce, including all waters which are subject to the ebb and flow of the tide; (2) all interstate waters including interstate wetlands; (3) all other waters such as intrastate lakes, rivers, streams (including intermittent streams), mudflats, sandflats, wetlands, sloughs, prairie potholes, wet meadows, playa lakes, or natural ponds, the use, degradation or destruction of which could affect interstate or foreign commerce including such

> waters: (i) which are or could be used by interstate or foreign travelers for recreational or other purposes; or (ii) from which fish or shellfish are or could be taken and sold in interstate or foreign commerce; or (iii) which are used or could be used for industrial purposes by industries in interstate commerce; (4) all impoundments of waters otherwise defined as waters of the United States under the definition; (5) tributaries of waters identified in paragraphs (1) through (4) of this section; (6) the territorial seas; and (7) wetlands adjacent to waters identified in paragraphs (1) through (6) (33 Code of Federal Regulations [CFR] 328.3[b]; 40 CFR 230.3[t]).

However, as a result of a U.S. Supreme Court decision (*Solid Waste Agency of Northern Cook County v. U.S. Army Corps of Engineers*, No. 99-1178, January 9, 2001), ACOE no longer has direct regulatory authority over many isolated intrastate waters, including wetlands.

ACOE defines wetlands as follows:

> Those areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands generally include swamps, marshes, bogs, and similar areas (33 CFR 328.3[b]; 40 CFR 230.3[t]).

ACOE developed standard methods (ACOE Wetland Delineation Manual) to identify and delineate wetland boundaries for the purpose of Section 404 regulation. A wetland determination is based on the presence of hydrophytic vegetation, hydric soils, and wetland hydrology. ACOE's Wetland Delineation Manual uses primarily field-based indicators to determine whether the three parameters are present. The presence of positive indicators of all three parameters is necessary for a site to qualify as jurisdictional wetlands.

In the absence of wetlands, the limits of ACOE jurisdiction in nontidal waters, such as rivers, streams, lakes, and ponds, extends to the Ordinary High Water Mark (OHWM). The OHWM can also be conceptualized as the lateral extent of the active channel, usually the area just below the first terrace.

This CWA applies to portions of the project that include wetlands or other waters of the U.S., such as the onsite creeks, drainages, and vernal pools. Potential impacts to these waters are analyzed in Section 3.1.3.

Section 1600 of the California Fish and Game Code

Under Sections 1600–1607 of the California Fish and Game Code, CDFG regulates activities that would alter the flow, bed, channel, or bank of streams and lakes. The limits of CDFG jurisdiction are defined in the code as the "bed, channel, or bank of any river, stream, or lake designated by [CDFG] in which there is, at any time, an existing fish or wildlife resource or from which these resources derive benefit." The California Code of Regulations (14 CCR 1.72) defines a stream as follows:

> [A] stream is a body of water that flows at least periodically or intermittently through a bed or channel having banks and supports fish or other aquatic life. This includes watercourses having a surface or subsurface flow that supports or has supported riparian vegetation.

In practice, CDFG usually extends its jurisdictional limit to the top of a stream or lake bank, or the outer edge of the riparian vegetation, whichever is wider. Riparian habitats do not always have identifiable hydric soils, or clear evidence of wetland hydrology as defined by ACOE. Therefore, CDFG wetland boundaries often extend beyond ACOE wetland boundaries, which sometimes include only portions of the riparian habitat adjacent to a river, stream, or lake.

The California Fish and Game Code applies to portions of the project that include the onsite creeks, drainages, and riparian habitats. Potential project impacts to these riparian areas are discussed in Section 3.1.3.

Section 401 of the Clean Water Act

The RWQCB has primary authority for permit and enforcement activities under the Porter-Cologne Water Quality Control Act (Cal. Water Code 13000–13999.10) and the CWA. Section 401 of the CWA requires certification from the California RWQCB that the proposed project is in compliance with established water quality standards. Projects that have the potential to discharge pollutants are required to comply with established water quality objectives.

Under Section 401 of the CWA, the RWQCB implements the water quality certification process for any activity that requires a federal permit or license and that may result in the discharge of pollutants into waters of the U.S., including wetlands. The RWQCB determines whether the activity would comply with state water quality objectives and, subsequently, either issues a certification with conditions or denies the certification. Water quality standards, according to the

CWA (40 CFR 131), include beneficial uses, water quality objectives, and the antidegradation policy.

No license or permit may be issued by a federal agency until certification required by Section 401 has been granted. Under the CWA, ACOE Section 404 permits are subject to RWQCB Section 401 water quality regulation. ACOE cannot issue an individual or Nationwide 404 permit until a 401 certification has been obtained from the RWQCB. For the 401 certification process, the RWQCB typically uses the delineation verified by ACOE as the basis for determining impacts to waters of the U.S.

Section 401 of the CWA is applicable to project components that may result in increased sedimentation, polluted runoff, and other impacts that, in turn, could cause indirect effects to sensitive biological species. Section 401 certification would be required as part of the Section 404 permit authorization process, and is anticipated to be issued concurrently. These indirect effects are discussed in Section 3.1.3, and are also discussed in the Hydrology and Water Quality section.

County of San Diego Resource Protection Ordinance (RPO)

The 2007 RPO includes special controls on development for the County's wetlands, floodplains, steep slopes, sensitive habitat lands, and prehistoric and historic sites. The RPO protects such sensitive lands by requiring a Resource Protection Study for certain discretionary projects. If the Resource Protection Study identifies RPO wetlands, RPO wetland buffers, or RPO sensitive habitat lands, then avoidance or avoidance to the maximum extent feasible and mitigation is required.

According to County Code Section 86.602 of Chapter 6 of the RPO, wetlands and wetland buffers are defined as follows:

(q). "'Wetland':

(1) Lands having one or more of the following attributes are 'wetlands':

(aa). At least periodically, the land supports a predominance of hydrophytes (plants whose habitat is water or very wet places);

(bb). The substratum is predominantly undrained hydric soil; or

(cc). An ephemeral or perennial stream is present, whose substratum is predominantly non-soil, and such lands contribute substantially to the biological functions or values of wetlands in the drainage system.

(2) Notwithstanding paragraph (1) above, the following shall not be considered 'wetlands':

(aa). Lands which have attribute(s) specified in paragraph (1) solely due to [human-built] structures (e.g., culverts, ditches, road crossings, or agricultural ponds), provided that the Director of Planning and Land Use determines that they:

(i) Have negligible biological function or value as wetlands;

(ii) Are small and geographically isolated from other wetland systems;

(iii) Are not vernal pools; and

(iv) Do not have substantial or locally important populations of wetland dependent sensitive species.

(bb). Lands that have been degraded by past legal land disturbance activities, to the point that they meet the following criteria, as determined by the Director of Planning and Land Use:

(i) Have negligible biological function or value as wetlands even if restored to the extent feasible; and

(ii) Do not have substantial or locally important populations of wetland-dependent sensitive species.

(Note: Activities on lands not constituting 'wetlands' because of this paragraph (2) may still be subject to mitigation, avoidance, and permitting requirements pursuant to CEQA or other applicable County, state, and federal regulations.)

(r). 'Wetland Buffer': Lands that provide a buffer area of an appropriate size to protect the environmental and functional habitat values of the wetland, or which are integrally important in supporting the full range of the wetland and adjacent upland biological community. Buffer widths shall be 50 to 200 feet from the edge of the wetland, as appropriate based on the above factors. Where oak woodland occurs adjacent to the wetland, the wetland buffer shall include the entirety of the oak habitat (not to exceed 200 feet in width)."

The RPO applies to the project because the site contains wetlands, wetland buffers, floodplains, steep slopes, sensitive habitat lands, and cultural resources. The RPO sensitive habitat lands are discussed in this section, and potential impacts are discussed in Section 3.1.3.

County of San Diego Habitat Loss Permit (NCCP Conformance)

San Diego County Code Section 86.101 provides for the issuance of a Habitat Loss Permit (HLP) under certain circumstances. The NCCP and HLP Ordinance regulate losses of CSS prior to issuance of certain grading permits, improvement plans, and grading and clearing permits.

Because the Cumming Ranch property is located outside of the adopted portions of the County MSCP area, an HLP will need to be obtained pursuant to the listing of the coastal California gnatcatcher under the 4(d) ruling of the FESA (Interim HLP) and pursuant to the provisions of the County Habitat Loss Ordinance (October 22, 1997). As part of this process, the County is required to make findings on the issuance of the HLP pursuant to Section 86.104 of the County of San Diego Code and Section 4.2.g of the Coastal Sage Scrub Natural Communities Conservation Plan Process Guidelines. Findings must be made demonstrating that the habitat loss will (1) not preclude connectivity between areas of high habitat values, (2) not preclude or prevent the preparation of the subregional NCCP, (3) be minimized and mitigated to the maximum extent practicable in accordance with Section 4.3 of the NCCP Process Guidelines, (4) not appreciably reduce the likelihood of survival and recovery of listed species in the wild, and (5) be incidental to otherwise lawful activities.

The HLP is applicable to the proposed project because it would impact CSS, as shown in Table 3.1-5. Because there would be a loss of CSS, an HLP would be required. Prior to the dedication of open space and the issuance of the HLP by the County, the RMP must be approved before the County can grant a grading permit. The RMP discusses mitigation and monitoring of CSS habitat, but also addresses all other sensitive habitats and species occurring within Area A open space lots. The RMP includes provisions for mitigation and monitoring of habitats and species such as oak tree replacement, species surveys and monitoring, and other efforts as part of the day-to-day management of the dedicated open space lots (e.g., budget control and analysis, debris removal, exotic weed removal, general maintenance of any open space signage).

3.1.2 Guidelines for the Determination of Significance

The guidelines for the determination of significance are based on numerous sources. Many of the guidelines are based on specific County regulations and requirements, such as the RPO and HLP, and others are based on state or federal requirements, such as the FESA. Development of the guidelines took into account the specific environmental setting and biological resources found on the project site, such as wildlife linkages, wetland habitats, and fringe effects, to ensure that all resources were considered. The project would have a significant adverse impact with regard to biological resources if it would do any of the following:

1. Conflict with any local policies, plans, or ordinances protecting biological resources, including, but not limited to, the County RPO, the HLP Ordinance, or the NCCP.
2. Result in a direct and/or indirect impact to individuals or local populations of an animal or plant species listed as federally or state endangered or threatened, a Species of Special Concern, or County sensitive.
3. Result in either direct and/or indirect potentially significant effects to wetland habitats or wetland buffers as defined by federal, state, or County RPO regulations.
4. Result in potentially significant adverse effects to habitats that serve as breeding, foraging, nesting, or migrating grounds and are limited in availability or serve as core habitats for regional plant and/or wildlife populations.
5. Result in significant adverse effects to vegetation communities or wildlife habitats that are restricted on a regional basis or serve as wildlife corridors.
6. Result in potentially significant adverse effects on core habitat, regional linkages, or local wildlife movement corridors.
7. Cause a decline in the value or function of onsite or offsite habitat as a result of substantial indirect edge effects such as elevated noise levels, light, introduced landscaping, domestic pets, and others.
8. Result in a cumulatively considerable impact under any of the above guidelines.

3.1.3 Analysis of Project Effects and Determination of Significant Impact

Direct impacts are those that affect biological resources such that those resources are not expected to recover to their preimpacted state (e.g., permanent development of a site through grading and building of structures). Direct impacts may be considered temporary or permanent. Indirect impacts occur secondary to the project's direct impacts, such as changes in general plant composition due to loss of substrate or other factors that may affect resources such as noise, dust, or lighting. Indirect impacts may be considered temporary or permanent, depending on the situation. Permanent biological impacts are defined as all impacts that result in the irreversible removal of biological resources. Temporary impacts are those impacts that have reversible effects on biological resources.

In accordance with standard practices for surveys, the entire project site was surveyed by qualified biologists and all sensitive environmental resources were mapped for GIS analysis. The project's impacts were analyzed by determining what effects would result from construction and

operation of the project improvements as shown in TM5433RPL7. The County's Requirements (County of San Diego, LUEG, Report Format and Content Requirements, Biological Resources, September 15, 2010) specify that surveys be done by County-approved biologists.

Determination of project impacts include both onsite and offsite effects. For purposes of this impact analysis, it is assumed that all land within the residential lots is affected, even though the actual grading will affect only a portion of the lot. Some open space lots are identified as impact neutral, as follows:

- Lot A is a 7.0-acre lot that is impact neutral because there is limited connectivity from adjacent planned residential lots and Highland Valley Road. Although no biological resources on this lot would be impacted, the 7 acres are not counted toward the project's onsite preservation of open space because it is of limited biological value.
- Lot B is a 7.9-acre lot that is impact neutral due to limited connectivity from proximity to SR 67 and planned residential lots. Although the biological resources on this lot, including nonnative grasslands, would not be impacted, the lot is not counted as part of the project's onsite preservation of open space.
- Lot C (4.8 acres) is impact neutral because it is an isolated patch of CSS with no connection to similar habitats. The CSS would be preserved, but the area would not count as part of the project's onsite preservation of open space.
- Lot D is a 6.4-acre lot encompassing a drainage area and is impact neutral, as it is surrounded by planned residential development on two sides and is isolated from other open space lots. The biological resources on this lot, including nonnative grasslands and cismontane alkali marsh, would be preserved, but would not count toward the project's onsite preservation of open space.
- Lot E (3.8 acres) preserves a large grove of mature oaks. This area is impact neutral because the resources are not directly impacted, but it is isolated and surrounded by residential lots.
- Lot F is a 4.3-acre lot encompassing a drainage area, and is impact neutral as it is surrounded by planned residential development on two sides and bounded by Highland Valley Road to the north. The biological resources within this lot, including nonnative grasslands, cismontane alkali marsh, and open coast live oak woodland, would be preserved, but would not count toward the project's onsite open space mitigation.
- Lot H (1.4 acres) contains a vernal pool and buffer area. While it contains a sensitive vernal pool resource, this location is not adjacent to or connected to similar onsite habitat

communities, thus, it is impact neutral. Preservation of this resource would not be counted as part of the project's onsite open space mitigation.

All staging and equipment lay-down areas would be located within the identified impact area. For this reason, no additional impacts to habitat areas would result from construction staging. These impacts are described in more detail in the following sections.

The trail alignment is shown in detail on the project map (TM5433RPL7) and on Figure 1-7. Project trails range from 8 to 15 feet in width; however, for purposes of biological impact assessment, a 20-foot corridor was considered impacted along all trail alignments. Impacts to habitat, sensitive species, and wildlife movement were assessed for trail construction and trail use according to each project impact section (guideline of significance), as appropriate.

After the site was surveyed and mapped, the project impacts were analyzed by GIS. Vegetation impacts have been accounted for on Table 3.1-5 and are combined as general project impacts. The trails and sewer alignments were co-located where possible (TM5433RPL7). The mitigation measures for vegetation/habitat impacts require compensation onsite in the project's open space, according to the type of habitat and in accordance with standard mitigation ratios. These mitigation measures fully mitigate the project's impacts to vegetation/habitat. The project causes no impacts to vernal pools because no uses or improvements (including trails) are proposed in or near the vernal pools or their watersheds.

After public review of this EIR, the project trails and staging area were removed from Area C due to airport requirements and to further reduce potential foraging and wetland impacts. The modified trail alignment is shown on Figures 1-7 and 1-9. It is similar to the alignment identified in the DEIR except that portions have been deleted.

The portions of the trail in Area A associated with Highland Valley Road and two sewer line crossings would impact 0.5 acre of alkali marsh wetland vegetation. In addition, the alignment of the future community trail in Area B would impact 0.5 acre of alkali marsh. The offsite trail in Hardy Ranch would impact 0.03 acre of Southern Riparian Scrub (see Table 3.1-5). The total trails impact would include approximately one acre of wetland vegetation. However, the vast majority of the 2.4 miles of trail construction stays in upland areas with impacts to coastal sage scrub, southern mixed chaparral, non-native grassland, and agricultural land.

Mitigation for impacts to most upland vegetation/habitat types are generally determined by mitigation ratios (acre to be purchased or conserved, to acre impacted by the project) set in the County Guidelines for Determining Significance (2010). These standard vegetation/habitat

mitigation ratios have factored in the importance of each type in the overall preservation of declining vegetation types and species. Mitigation ratios are standardized and not dependent upon the quality of the habitat. Rather, the mitigation ratios recognize the regional importance of the habitat, its overall rarity, and the number, variety and sensitivity of species it supports. Mitigation for wetlands is subject to other jurisdictions and is discussed separately below. For Cumming Ranch, all vegetation/habitat mitigation occurs on the project site.

Since the trail/sewer alignment in Area B has significant impacts to wetland vegetation, a resurvey prior to approval of the final map is proposed to determine if impacts can be further minimized. Although the impacts for the trail in Area B have been evaluated and fully mitigated, the following has been applied to the project as a condition of approval: Prior to finalizing the alignment on the final map, a County-approved biologist and the project engineer would survey and may recommend adjusting the trail and sewer alignment (20-feet wide) in Area B to deviate not more than 100 feet south of the approved location on the tentative map. Changes to the alignment must reduce biological impacts by moving the trail away from alkali marsh to agricultural land or by increasing the width of the wetland buffer along Santa Maria Creek. The survey and alignment recommendations shall be done prior to approval of the final map and be reviewed and approved by DPLU (sewer) and DPR (trails). The applicant is only responsible for granting an easement for the trail in Area B because this trail would be constructed in the future by DPR in coordination with the Ramona Grasslands Preserve Public Access Plan. As shown in Table 3.1-5 the existing alignment would result in impacts to 0.48 acre of alkali cismontane marsh. Figure 3.1.1c shows that an adjustment of not more than 100 feet to the south would allow for a wider wetland buffer along Santa Maria Creek and a decrease in significant alkali marsh impacts, with an increase in less than significant agricultural land impacts. Impacts would be less than what is analyzed and disclosed in this Final EIR.

Conformance with Biological Resource Protection Policies

County of San Diego Habitat Loss Permit (HLP) Ordinance

The County's HLP Ordinance (Section 86.101 et al.) requires compliance with the NCCP for projects located within the planning area for the Coastal Sage Scrub NCCP. The County became a participant in the NCCP in 1993 with the stated intent to "provide for regional protection and perpetuation of natural wildlife diversity while allowing compatible land use and appropriate development and growth." The NCCP process guidelines were established as interim guidelines until formal subregional plans were approved. The draft North County Multiple Species Conservation Program (NCMSCP) would be the subregional plan for this portion of the County when adopted. For the NCMSCP, most of the project area is within a proposed Pre-Approved

Mitigation Area and, therefore, the project's preserve design and its onsite mitigation is important to development of the NCMSCP. Decision-makers must determine whether the project complies with the interim program by making findings relative to the overall goals and policies of the NCCP, including that the project would not preclude or prevent the preparation of the future NCMSCP.

The findings relate to maintaining connectivity between areas of high habitat values, minimizing and mitigating the habitat loss, and not reducing the likelihood of survival or recovery of listed species. The required findings can be made because the project proposes development on the most disturbed habitats, primarily those that have been farmed for decades, in the southern area that is adjacent to SR 67 and existing development. The project proposes open space for wildlife use, including areas adjacent to the Ramona Grasslands Preserve, onsite portions of Santa Maria Creek and Etcheverry Creek, and the site's major hilltops and ridgelines. The project would accomplish its mitigation within the project area by preservation of the northern area that has the most connectivity with the existing Ramona Grasslands Preserve to the north and connectivity along Etcheverry Creek offsite to rural areas of southern Ramona and Barnett Ranch to the southeast. The habitat loss would not appreciably reduce the likelihood of survival and recovery of listed species in the wild, and, in fact, biological surveys did not demonstrate direct impacts to listed species. Potential habitat of listed species would be avoided by preserving major grassland, riparian, and CSS habitats along the Santa Maria and Etcheverry Creeks. The project also incorporates project measures such as preconstruction surveys, grading limitations and monitoring, an RMP, fencing as necessary, and signage to reduce edge effects. Specific studies (TAIC 2011) demonstrated that the project, as designed, would not appreciably impact golden eagle foraging or other raptors. Overall, the project is consistent with the HLP Ordinance and the NCCP because it contributes to the regional preserve design, allows for the continued survival of endangered species, and appropriately mitigates for impacts. Habitat loss would be incidental to lawful activities.

Findings of Conformance were made that demonstrate that the Cumming Ranch project has provided for wildlife connectivity, minimized and avoided loss of habitat and species, and incorporated mitigation requirements consistent with building the future NCMSCP (HLP Findings, August 17, 2012). On November 16, 2012, the wildlife agencies issued a letter of concurrence with the HLP Findings, the preserve design, and the proposed mitigation for the upland resources.

County of San Diego RPO

The County RPO requires that wetland buffers be established "to protect the environmental and functional habitat values of the wetland, or [habitat this is] integrally important in supporting the

full range of the wetland and adjacent upland biological community." Fifty-foot minimum wetland buffers would be established throughout the proposed development. These buffers would protect the existing drainages and unnamed swales from direct and indirect construction- and postconstruction-related impacts. Wetland buffers would extend from the edge of the wetland to the lot line. The determination to use a 50-foot-wide buffer on either side of wetlands and waters was based on the overall quality and function of the wetlands, which have been subject to agriculture for many years, as well as the abutment of the buffer to the 100-foot-wide residential lot LBZ, which prohibits (1) animal keeping without effective restraints or fencing; (2) lighting; (3) exotic invasive landscaping; and (4) focal use areas including arenas, pools, and patios; and (5) all structures, unless written verification is obtained from the County Fire Marshal that the structure will not require fuel modification to extend into biological open space. In addition, these wetlands and wetland buffers would be protected within the large open space easements adjoining and/or integrated within the wetlands and wetland buffers. All wetlands and wetland buffers would be included within the dedicated Area A open space area.

The RPO allows encroachment into RPO wetlands and wetland buffers under specific, limited circumstances. Encroachments for required infrastructure are required to meet specific criteria, as demonstrated by these findings for this project:

aa. There is no feasible alternative that avoids the wetlands.

The RPO wetlands that exist on the project site traverse the property in such a manner that it is impossible to install sewer lines connecting the proposed lots with the point of connection at the sewer treatment plant without crossing the wetlands.

The sewer collection system was designed to reduce the amount of required grading for the lots and to provide a more rural appearance to the overall development. Because each lot would be individually contoured into the existing topography, and the site would not be mass graded, some sewer lines are designed to be placed within the low-lying areas of the property instead of within the project roadways.

There is no feasible alternative to connect the proposed lots to the existing sewer facilities that avoids the wetlands.

bb. The crossings are limited to the minimum number feasible.

The number of crossings has been limited through specific consideration during site design. Where feasible, crossings are designed to serve multiple purposes such as combining trail

alignments with sewer crossings and combining the secondary access/egress road with a utility crossing.

cc. The crossings are located and designed in such a way as to cause the least impact to environmental resources, minimize impacts to sensitive species, and prevent barriers to wildlife movement (e.g., crossing widths shall be the minimum feasible and wetlands shall be bridged where feasible).

In addition to impacts associated with the required widening of Highland Valley Road, there are three locations where crossings would occur:

- The first crossing would be located north of Highland Valley Road, west of Highland Valley Court. This would be a crossing for a sewer line that conveys effluent from the homes south of Highland Valley Road. This crossing would occur at a narrowed point on the drainage at a right angle to the channel to minimize the amount of impact to sensitive resources. The pipeline would be installed below grade and the area of impact would be restored to its natural condition so as not to create a barrier to wildlife movement.
- The second crossing would be located north of the terminus of Highland Valley Court. This crossing would be a multi-purpose crossing to accommodate water and sewer pipelines, as well a secondary fire access/egress road that would link Highland Valley Court with the homes located in the northern portion of Area A. This crossing would occur at a narrowed point on the drainage at a right angle to the channel to minimize the amount of impact to sensitive resources. The secondary fire access/egress road would use a concrete dip section "wet crossing" design to minimize impacts to sensitive resources. The secondary access/egress road would only be used for emergency evacuation.
- The third crossing would be located just off the project site immediately north of the sewer pump station. This crossing would accommodate both the sewer line and the proposed offsite trail and would occur where an existing road crosses the drainage. The co-location of the sewer line and trail at the point of an existing roadway crossing minimizes impacts to habitat and sensitive species.

dd. The least damaging construction methods are used.

The least-damaging construction methods would be used for each of the four crossings, including the location of all staging areas outside of sensitive areas. Work would not be performed during the sensitive avian breeding season, and noise attenuation measures would be included.

ee. The applicant shall prepare an analysis of whether the crossing could feasibly serve adjoining properties and thereby result in minimizing the number of additional crossings required by adjacent development.

The proposed crossing for the installation of utility lines and for trail use would not be used for vehicular access. One crossing would accommodate vehicular access: a secondary fire access/egress roadway. This secondary access/egress is internal to the project and would not serve adjoining properties. The areas surrounding the project site are generally either built out or preserved as open space, so there is little potential to minimize the number of crossings by serving adjoining properties. The Spirit of Joy Lutheran Church, included as project #10 in the List of Cumulative Projects (Table 1-7), may potentially connect to the project sewer system, thus minimizing additional crossings.

ff. There must be no net loss of wetland, and any impacts to wetlands shall be mitigated at a 3:1 ratio (this shall include a minimum 1:1 creation component, while restoration/enhancement of existing wetlands may be used to make up the remaining requirements, for a total 3:1 ratio).

There would be no net loss of wetlands because impacts to wetlands would be mitigated at a minimum ratio of 3:1 on the project site, as shown in Table 3.1-8.

As demonstrated by the above findings, the project design meets these criteria, and the impacts to wetland habitat would not conflict with the RPO.

Areas distinguished by high-quality southern willow scrub, mulefat scrub, and cismontane alkali marsh, such as those found along Santa Maria Creek, vernal pools and expanses of grasslands (both native and nonnative), such as those contiguous with the Ramona Grasslands Preserve, meet the criteria of "sensitive habitat lands" because they support unique communities or habitats of rare or endangered animals or plants. Impacts are prohibited, except when all feasible measures necessary to protect and preserve the sensitive habitat lands are incorporated, and mitigation provides an equal or greater benefit to the species. Mitigation for these sensitive vegetation communities are detailed in Table 3.1-5 and are compliant with County policy per Guideline 1.

Thus, the impact would be ***less than significant*** regarding applicable biological resources protection policies per Guideline 1, because the project meets the requirements and/or makes the findings required for conformance, as detailed above.

Direct Effects to Sensitive Vegetation Communities

Development of the project, including the residential pads, project roadways, installation of sewer lines and sewer lift station, installation of trails and pathways, and road improvements, would result in permanent impacts to sensitive vegetation communities. Offsite impacts would include installation of the sewer line and trail through Hardy Ranch and widening and improvements along Highland Valley Road and at the intersection of Highland Valley Road and SR 67. Temporary direct impacts within the development footprint may result from lay-down areas, noise, and dust. Details of impacts to all vegetation communities both onsite and offsite as a result of the proposed project are presented in Table 3.1-5. The areas where impacts to sensitive vegetation communities and the associated acreage would occur are described below.

Engelmann oak woodland would be directly affected by the proposed project. Impacts would occur to 0.20 acre of Engelmann oak woodland. Per Guidelines 4 and 5, the impact to this sensitive vegetation community would be considered a ***significant impact*** (**Impact BI-1**).

Open coast live oak woodland would be directly affected by the proposed project. Impacts would occur to 0.06 acre of open coast live oak woodland. Per Guidelines 4 and 5, the impact to this sensitive vegetation community would be considered a ***significant impact*** (**Impact BI-2**).

Valley needlegrass grassland would not be affected by development of the proposed project. All of the valley needlegrass grassland on the project site is located within Area C, where no development would occur. Therefore, per Guidelines 4 and 5, the project would result in ***no impact*** to valley needlegrass grassland.

Southern willow scrub, both onsite and offsite, would be directly affected by the proposed project. Impacts would occur to 0.05 acre of southern willow scrub. Per Guidelines 4 and 5, the impact to this sensitive vegetation community would be considered a ***significant impact*** (**Impact BI-3**).

Mulefat scrub, both onsite and offsite, would be directly affected by the proposed project. Impacts would occur to 0.05 acre of mulefat scrub. Per Guidelines 4 and 5, the impact to this sensitive vegetation community would be considered a ***significant impact*** (**Impact BI-4**).

Cismontane alkali marsh, both onsite and offsite, would be directly affected by the proposed project. Impacts would occur to 1.02 acres of cismontane alkali marsh. Per Guidelines 3, 4, and 5, the impact to this sensitive vegetation community would be considered a ***significant impact*** (**Impact BI-5**).

Vernal pools are located mainly in Area C, and the project would not affect this area. These pools and a satellite pool located in Area B would not be affected by project development. In addition, Area B would be preserved through purchase and inclusion in the Ramona Grasslands Preserve.

The satellite pool in Area A would be located in an open space lot (Lot H). The distance from the edge of the vernal pool to the nearest lot is more than 100 feet to its border with Lot 120. The residential building pad on Lot 120 is an additional 100 feet away and within a limited building zone easement. Therefore, the minimum separation between this vernal pool and residential uses is more than 200 feet. In addition, the preliminary grading plan indicates the natural contours of Lot 120 and other lots in this area would remain, and therefore, the drainage would continue in a similar manner toward the pool area.

Hydrology studies indicate that runoff from each lot in the proposed project would be at or below predevelopment conditions due to lengthened flow paths, reduction of slope, and improved quality of vegetative cover to enhance infiltration of surface storm discharge. The lots in this location are large, and a substantial portion of the lot areas would remain as pervious surface, allowing for infiltration of runoff. Additionally, the cismontane alkali marsh and nonnative grasslands located between the development area and the vernal pool would remain and continue to provide natural biofiltration prior to runoff entering the vernal pool area, minimizing any potential for degradation of the pool from increased runoff volume or pollutants. Thus, the vernal pool in Lot H would not be adversely impacted by runoff. Offsite pools on Hardy Ranch and in Areas B or C are not located near the proposed alignment of the trail or sewer easement, and would not be affected by the project. Per Guidelines 3, 4, and 5, ***impacts would be less than significant*** to vernal pools.

Nonvegetated channels, both onsite and offsite, would be directly affected by the proposed project. Impacts would occur to 0.03 acre of nonvegetated channel. Per Guidelines 3, 4, and 5, the impact to this sensitive vegetation community would be considered a ***significant impact*** (**Impact BI-6**).

CSS, both onsite and offsite, would be directly affected by the proposed project. Impacts would occur to 26.34 acres of CSS. Because the project would cause impacts to CSS, an HLP would be required and findings would be made. All of the HLP findings for the Cumming Ranch project can be made. Refer to Section 3.1.2, HLP Ordinance Conformance. Although there would be no adverse findings regarding the loss of CSS for the HLP, per Guidelines 4 and 5, the loss of acreage of this sensitive vegetation community would be considered a ***significant impact*** (**Impact BI-7**).

Granitic southern mixed chaparral would be directly affected by the proposed project. Impacts would occur to 19.35 acres of granitic southern mixed chaparral. Per Guidelines 4 and 5, the impact to this sensitive vegetation community would be considered a ***significant impact*** (**Impact BI-8**).

Granitic chamise chaparral would be directly affected by the proposed project. Impacts would occur to 4.05 acres of granitic chamise chaparral. Per Guidelines 4 and 5, the impact to this sensitive vegetation community would be considered a ***significant impact*** (**Impact BI-9**).

Nonnative grassland, both onsite and offsite, would be directly affected by the proposed project. Impacts would occur to 12.94 acres of nonnative grassland. Per Guidelines 4 and 5, the impact to this sensitive vegetation community would be considered a ***significant impact*** (**Impact BI-10**).

Field/pasture, both onsite and offsite, would be directly affected by the proposed project. Impacts would occur to 164.95 acres of field/pasture. Per Guidelines 4 and 5, the impact to this sensitive vegetation community would be considered a ***significant impact*** (**Impact BI-11**).

Impacts to eucalyptus woodland, disturbed habitat, and developed areas are ***not significant***, as they are not sensitive vegetation communities per Guidelines 4 and 5.

Direct and Indirect Effects to Federal, State, and County RPO Jurisdictional Waters and Wetlands

Wetland impacts are strictly from the trail/sewer alignments. In Area A, impacts include 0.5 acre of alkali marsh wetland vegetation would result from the improvements to Highland Valley Road, two sewer crossings onsite, and associated pathways and trails, and 0.15-acre of alkali marsh wetland vegetation for additional sewer alignment impacts. In Area B, the alignment of the sewer and a future community trail would potentially impact 0.5 acre of alkali marsh. A total of 1.18 acre of wetlands and waters would be affected.

Tables 3.1-6, 3.1-7, and 3.1-8 detail the impacts to federal, state, and County RPO wetlands and waters. There would be a total impact of 0.13 acre to ACOE jurisdictional wetlands and waters, 1.18 acres of CDFG jurisdictional wetlands and waters, and 1.18 acres of County RPO jurisdictional wetlands. Due to the impact to jurisdictional wetlands and waters, federal, state, and local permits would be required for project implementation, as detailed in the Biological Technical Report (Appendix B). Indirect impacts could occur as a result of maintenance vehicles crossing streams during or after rains (when water is flowing into streams), resulting in increased erosion.

Design of the project includes 50-foot-wide minimum wetland buffers from the residential development. These buffers would protect the existing drainages and unnamed swales from direct and indirect construction- and postconstruction-related impacts. Wetland buffers would extend from the edge of the wetland to the lot line. The determination to use a 50-foot-wide buffer on either side of wetlands and waters was based on the overall low quality and function of the wetlands, as well as the abutment of the buffer to the 100-foot-wide residential lot LBZ (thus, creating a total of 150 feet between the wetland area and residential development). In addition, these wetlands and wetland buffers would be protected within the large open space easements adjoining and/or integrated within the wetlands and wetland buffers. All wetlands and wetland buffers would be included within dedicated Area A open space.

As indicated in Table 3.1-5, there are no impacts to vernal pool vegetation/habitat. The majority of vernal pools are located in Area C, which would not be affected and would continue to be preserved through conservation easements. The project's preservation of the entire Area C would serve to further protect the vernal pools through increased buffering. A small portion of the proposed nature trail alignment is located within offsite Hardy Ranch. This trail alignment was located in disturbed habitat, agricultural land, and eucalyptus grove, and avoids impacts to vernal pools.

If project improvements were located in proximity to vernal pools, indirect impacts could result construction and maintenance and/or increased pedestrian traffic. The closest project disturbance to the satellite pool in Area B is the Hardy Ranch trail alignment, and it is 200 feet away. Consequently, it would not be affected. The second satellite pool, located in the northwest corner of Area A, is in an open space lot with a minimum 100 foot buffer and project improvements removed an additional 100 feet away by a limited building zone easement. There are no other project improvements located near vernal pools and the project will have no impacts on vernal pools.

The loss of jurisdictional federal, state, and County RPO waters and wetlands is a direct impact of the project. Trail use by horses or maintenance vehicles on the two creek crossings discussed above during or after rains when water is flowing over the surface could result in increased erosion and an indirect impact of the project. Per Guideline 3, these onsite and offsite impacts include ACOE waters and wetlands, CDFG wetlands, and County RPO wetlands, and would be a ***significant impact*** (**Impact BI-12**).

Direct Effects to Sensitive Plants

Engelmann oaks occur throughout Area A, both in oak woodland habitats and as individual trees within nonwoodland habitats. Impacts to oak woodland habitats are discussed separately under sensitive vegetation communities.

There are 30 Engelmann oaks on the project site. Eleven of the Engelmann oaks would be impacted by the project and 19 would be preserved in open space. Of the 11 impacted Engelmann oaks, one would be removed by grading within a residential lot. The remaining 10 oaks would be located within the lots, but outside of the residential pad grading limits. These 10 individuals are considered impacted through potential human-associated uses within the tree's understory within private lots. This may include compacting the soil within the drip-line and the potential for over-watering of mature trees, which may result in root rot. There are four Engelmann oaks located in proximity to the proposed trail. The trail was designed to avoid potential impacts to these individuals, including avoiding impacts to the root zone. The impacts to 11 Engelmann oak trees are a ***significant impact*** per Guideline 2 (**Impact BI-13**).

There are 30 coast live oaks on the project site. Four coast live oaks would be impacted, as they occur within the project development footprint within Area A, and 26 would be preserved in open space lots. One out of the four impacted coast live oaks would be removed by grading within a residential lot. The remaining three oaks would be located within the lots outside of the residential pad grading limits. However, these three individuals are considered directly impacted, as described above. Because coast live oak trees are not considered a sensitive species, impacts are ***less than significant*** per Guideline 2. However, since these trees enhance the habitat value for animal species, the four coast live oak trees would be moved or replaced within the biological open space. The biological lots are preserved to protect the mature oaks; however, they are considered impact-neutral because they are isolated and surrounded by the residential lots.

There are 41 oak hybrids found onsite (scrub oak crossed with either coast live oak or Engelmann oak). The individual oak hybrids found onsite are classified as shrubs. A total of 24 oak hybrids would be directly impacted, including seven that would be removed by grading and 17 located in lots but outside of the residential pad grading limits. A total of 17 oak hybrids would be preserved within open space lots. Because oak hybrids are not a sensitive species, impacts to oak hybrids are considered ***less than significant*** per Guideline 2.

Southern tarplant is considered a County-sensitive plant species (Group A), and is considered rare by CNPS (List 1B). Development of Cumming Ranch would result in impacts to 3.70 acres of southern tarplant. This total is derived from impacts of 3.30 acres in Areas A and B, 0.20 acre

in the ROW, and 0.20 acre from installation of the offsite sewer lines and trails. This impact totals approximately 15% of the total southern tarplant population within the Cumming Ranch site. The impact to southern tarplant is a ***significant impact*** of the proposed project per Guideline 2 (**Impact BI-14**).

Direct Effects to Sensitive Animals

No federally and/or state-listed endangered or threatened species were detected within the area of the project proposed for development (Area A) or in the areas specified for offsite construction. Sensitive species (California Special Concern species or County Sensitive) found within the project area are listed in Table 3.1-4. Although these species are not threatened or endangered, they are considered rare and are afforded consideration under CEQA. Direct impacts to these species could occur from the proposed project through loss of resident habitat, including foraging, denning/nesting/burrowing, and dispersal habitats within Area A. Offsite preserved acreage at the adjacent Hardy Ranch and nearby Cagney Ranch would add to the benefit of available dispersal, foraging, and breeding habitat. Additional preservation of these species' habitats would occur within Areas B and C; however, lost habitat in Area A would affect sensitive species known to occupy the area, as described below.

In 2011, a golden eagle and while-tailed kite survey and habitat assessment, including literature review and field observations of foraging behavior, were completed. The literature provided information on nesting success in relation to prey abundance, quality of foraging habitat, and effects of recreation on nesting and foraging success. The onsite observations of foraging activity were used to document presence/absence of the species and document golden eagle utilization of the Cumming Ranch property and adjacent Ramona Grasslands Preserve areas. The nesting sites of golden eagles and white-tailed kites are located in cliffs and mature trees, respectively. All of the known nesting sites for these species are located outside of the Cumming Ranch project site. The closest recorded golden eagle nest is more than 8,000 feet away, the closest bald eagle nest (under construction – winter 2012) is 7,400 feet away, and the closest white-tailed kite nest is more than 900 feet away from the residential development in eucalyptus trees overlooking Area B open space (on Hardy Ranch). None of these nests exceed the County's thresholds for significance so impacts to nesting would be ***less than significant*** (unless raptors colonize a nest site prior to project construction – see discussion under construction impacts)**.**

The Bald and Golden Eagle Protection Act of 1940 prevents activities in the vicinity of eagle nests from disturbing the species such that the disturbance is likely to cause "a decrease in its productivity, by substantially interfering with normal breeding, feeding, or sheltering behavior or nest abandonment, by substantially interfering with normal breeding, feeding, or sheltering

behavior." The assessment found that, based on the 2009 definition of "disturb" given in the Bald and Golden Eagle Protection Act, the proposed Cumming Ranch project would not constitute a "take" of the golden eagle because the project would not likely cause a "decrease in its productivity by substantially interfering with its normal breeding, feeding, or sheltering behavior." The proposed Cumming Ranch project would remove approximately 3% of the total foraging habitat available to golden eagles in the area. This loss of foraging habitat is not substantial and would not cause a decrease in productivity or nest abandonment by golden eagles in the area. This analysis extends to other raptors of the Ramona Grasslands Preserve. The prey density present on the remaining 97% of available foraging habitat is robust and would provide an adequate food supply for golden eagles and raptors in the vicinity of the Cumming Ranch project. Bald eagles prefer fish and waterfowl prey (Sibley, 2000). Fish resources are not known to be available in this area, so migratory waterfowl or other birds would be the most likely food source available.

Impacts of the project on white-tailed kite were considered in the HDR Biological Technical Report (Appendix B) and the TAIC eagle and Raptor Foraging Study (Appendix P). The study indicated Field research indicates that kite and other raptors are primarily using the grasslands and agricultural areas of Areas A and B. Based on general knowledge of individual raptor's natural history and the habitat resources that are present on the project site, the severity of project impacts on raptor foraging is based on the degree of foraging habitat removed by the project. For white-tailed kite and other raptors, the significance of the project impact was determined based on the County threshold, or, a loss of foraging habitat in excess of 5% of the functional foraging area (non-native grasslands and pasture, primarily, and agricultural land secondarily). With the restrictions of the open space easements that are included in the project, the ***potentially significant impacts*** would be minimized to 3% and would be less than significant (TAIC, 2011).

The TAIC study determined that there was white-tailed kite nesting in eucalyptus trees on the Hardy Ranch, overlooking Area B. However, white-tailed kite nesting is not necessarily a "persistent" resource because kites have a fairly low nest and forage area "fidelity." Eagles are considered more sensitive than other foraging raptors because they have a high nest and forage fidelity, and they tend to keep the same nest for many years. This characteristic makes them more sensitive to development than other raptors. Therefore, eagles are considered to be the "bellwether" of quality raptor foraging. Since impacts for eagles, the most sensitive of raptors, would be reduced to less than significant with preservation and management of foraging habitat in the project's open space, impacts for the other raptors would also be considered reduced to ***less than significant***.

Sensitive herpetofaunal species potentially affected include western spadefoot toad, arroyo toad, San Diego horned lizard, granite spiny lizard, granite night lizard, coastal California whiptail lizard, California orange-throated whiptail lizard, and two-striped garter snake. Sensitive mammalian species potentially affected include Stephens' kangaroo rat, mountain lion, American badger, San Diego desert woodrat, San Diego black-tailed jackrabbit, California pocket mouse, and southern mule deer. In addition to golden and bald eagle discussed above, sensitive avian species affected by loss of habitat include Canada goose, turkey vulture, white-tailed kite, northern harrier, Cooper's hawk, red-shouldered hawk, ferruginous hawk, loggerhead shrike, great horned owl, burrowing owl, zone-tailed hawk, red-tail hawk, rough-legged hawk, American kestrel, barn owl, grasshopper sparrow, and Bell's sage sparrow. Impacts could also occur to nesting raptors and other species listed under the MBTA, if MBTA protections are not followed. The potential direct impacts to the above-listed sensitive herpetofaunal, mammalian, and avian species due to habitat loss are ***significant impacts*** per Guideline 2 (**Impact BI-15**).

Indirect Effects of Project Construction

Potential sources for indirect impacts during project construction to the vegetation communities and sensitive plant or animal species known to occur adjacent to the project construction area could include trampling of vegetation outside of the limits of grading by workers and vehicles during construction; erosion, runoff, dust, and siltation into offsite areas; impacts related to storage and access areas; and indirect impacts through trail construction. Indirect effects could result from construction noise to sensitive avian species during their breeding seasons, including coastal California gnatcatcher, raptors, and other species listed under the MBTA. These potential indirect construction impacts to sensitive vegetation communities and animal species would be short term but are considered ***significant impacts*** per Guidelines 2, 4, and 5 (**Impact BI-16**).

Indirect Effects of Project Occupation

Indirect effects of project occupation to sensitive plants or animals are those effects that could occur after project development with the introduction of development in an area that once was undeveloped. These types of impacts could include changes to wildlife dispersal, foraging, denning, burrowing, and nesting that could result from increased night lighting, noise, storm water runoff, interface with domestic animals, trail use, and other impacts. Indirect impacts to vegetation generally include human-associated uses such as compacting soil within the drip-line of trees, overwatering mature trees, fugitive dust loads next to trails, and the potential for vegetation trampling next to trails.

The project was designed with larger lots which provide a natural separation between development and the natural areas of the project site. This natural separation would deter people and pets from encroaching into the natural areas. Additional separation would occur beyond the property lines to protect sensitive habitat and wildlife by allowing space and distance between the habitat and active developed areas, and to serve as natural biofilters for runoff from the developed areas.

Where existing paths and obvious pedestrian access has occurred, management would include placement of natural barriers (e.g., rock formations and heavily planted areas) with development of the project. The goal of creating natural barriers would be to discourage infringement into open space, specifically at points where a person could choose to follow the designated pathway or cut through the sensitive open area. Natural barriers would include such materials as impassable brush, mounding, rocks, and trees at potential entry points into the open space areas. Examples of these points of entry may include areas surrounding trailheads or the open space area adjacent to the roadway near Lots 100 and 101.

The project area and proposed trail system was examined to determine if foraging habitat would be affected. The study determined that the project's trail use would be unlikely to deter foraging activities by golden eagles and other raptors (TAIC 2011). The proposed recreational trail would be multi-use, but not open to motorized vehicles of any kind. In the study, foraging behaviors appeared to be relatively unaffected by passive recreational use. The ability for bird watchers in the Ramona Grasslands Preserve to regularly observe the foraging behavior of raptor species (e.g., annual Hawk Watch) indicated that passive recreation had a minimal effect on foraging activities by these species. Because only nonmotorized activities such as hiking, bicycling, and equestrian use would be allowed, there would be little impact to foraging behaviors of raptor species, including golden eagle and white-tailed kite. In addition, since the study was completed, the trail and the staging area in Area C have been removed from the plan, and the trail in Area B would be implemented in the future by County DPR in coordination with the Ramona Grasslands Preserve Public Access Plan. The project trails remain in Area A and in the County-owned Hardy Ranch.

All of the known raptor nesting sites are located outside of the Cumming Ranch project footprint. As detailed in the TAIC assessment, USFWS provides guidelines for avoiding disturbance to bald and golden eagles. These guidelines include specifics for "non-motorized recreation and human entry (including hiking, camping, fishing, hunting, canoeing)." According the guidelines provided by USFWS:

If you walk, bike, canoe, camp, fish, or hunt near an eagle nest during the breeding season and your activity will be visible or can be heard from the nest, stay at least 330 feet (100 meters) from the nest.

None of these activities near a nest would disturb the eagles if the activity cannot be seen or heard from the nest.

Passive recreational use of the proposed multi-use trail are not likely to interfere with golden eagle foraging success, as the startling of prey species (e.g., rabbits, squirrels, small mammals) would not extend beyond the immediate edge of the proposed trail.

In addition, since the territories of the golden eagles of Ramona include areas of rural and low-density urban housing and commercial developments, it is likely that these resident birds are reasonably habituated to human activity in the area. Therefore, it is reasonable to conclude that the addition of passive recreational activity would not adversely affect the eagles' ability to survive and reproduce. The eagle study recommended and the wildlife agencies agreed that the project including the proposed multi-use trail system would not constitute "take" of the golden eagle under the Bald and Golden Eagle Protection Act (TAIC 2011).

As with golden eagle, bald eagle foraging may be affected by the residential and trail uses proposed by the project. However, bald eagles are generally known to be more adaptable to humans than golden eagles and would be less affected by development and populated areas for selecting foraging areas (Schaefer, personal communication, 2012). Cumming Ranch would likely offer foraging opportunities to the pair of bald eagles nesting near Rangeland Road.

The project was designed with minimal fencing to maintain the open and seamless integration with the natural grasslands and open space areas. Fencing would be included in the project design only where necessary to enclose domestic animals. Signage would be located at the edge of residential lots to delineate the boundary between private property and sensitive open space. There may be special circumstances, such as roadways, that require the use of fencing where natural barriers or buffer areas would not create a physical separation. Allowed fencing types would include strand wire, wooden rail, or other natural materials. No chain-link or similar type of fencing would be permitted. Fencing would be required on other lots that are suitable for large animal keeping.

To maintain the rural nighttime ambience that is important in Ramona, there would be no street lighting within the proposed project. Minimal lighting may be required at the project entrances off of Highland Valley Road for safety purposes. Homeowners could have exterior lighting

within allowed parameters, such as motion lights, use of shutoff timers, and use of downshielding. The natural buffers within the private yards, as well as the designated open space, would help to minimize spillover into other sensitive areas, including both wildlife areas and adjacent residential properties.

The project is adjacent to agricultural land that has been farmed for decades. Consequently, the native habitats have already been removed to a large extent. Introduction of exotic grasses and non-native invertebrates has already occurred. The smaller open space lots, Lots A – H, would be isolated by residential development, but they have been preserved for avoidance of biological resources (the vernal pool in Lot H, Englemann oaks, and streambeds) and to function as archipelago connections to the Ramona Grassland Preserve. These seven lots, totaling 43.3 acres, include appropriate LBZ easements and wetland buffers, but have not been included as mitigation land. They are considered impact neutral.

More importantly, indirect impacts and edge effects have been minimized and the project's open space preserve has been maximized through application of NCCP preserve design principles such as maximizing the area to perimeter ratio for the preserve (covering 67% of the site and forming a large area of connecting blocks, narrowed at one end where it enters Area A), widening wildlife movement widths (to exceed 1,000 feet to accommodate all types of wildlife), and incorporating adequate fuel management in the project footprint. These design measures would reduce potential indirect impacts of project development; however, per Guideline 7, the potential would still exist for resident or trail user encroachment into sensitive areas, and this is considered a potentially ***significant impact*** **(Impact BI-17).**

Effects to Wildlife Dispersal Corridors and Linkages

As noted previously, the primary wildlife dispersal corridors and linkages are Santa Maria Creek in Areas B and C and Etcheverry Creek in Area B. Secondary corridors and linkages include the various unnamed drainages throughout Areas A and B that feed into Etcheverry Creek. Indirect impacts to wildlife could occur during construction and upon use of the development. These indirect impacts may include temporary construction noise; temporary obstruction of or diversion of travel routes; increased presence of humans, vehicles, and associated construction debris; edge effects between open space lots and residential lots and internal streets where humans and vehicle traffic would occur more frequently; noise and lighting from residential units; and domestic pet interactions.

It is anticipated that some of the small and medium sized mammals and herpetofaunal species would either abandon their territories or adapt to the constraints of development within Area A.

However, most of the small and medium sized animals were observed within the proposed open space areas within Area A and within adjacent open lands in Areas B and C. Mobile species such as the jackrabbit would avoid impacts from construction of the proposed development. The presence of mesopredators such as domestic dogs and cats, increased vehicle traffic, and increased ambient lighting may result in both direct and indirect impacts to many of the smaller animals. In addition, development of the site may create impacts to raptor foraging and other wildlife uses.

The project was designed to protect and maintain wildlife movement and dispersion corridors throughout the site. Etcheverry Creek and Santa Maria Creek would both be preserved in open space within Areas B and C. The secondary corridors and linkages, including the smaller drainages that traverse the site, would be preserved within open space lots and/or easements. In addition, as described in Chapter 1, Open Space Enhancement, specific natural areas throughout Area A would be enhanced with compatible and appropriate plantings to increase wildlife habitat and provide natural aesthetic value. This would include enhancement of the drainage corridors within Area A with native species such as mule fat scrub or willows to provide additional protective cover for birds and small animals that use these local wildlife corridors. The enhanced drainage areas are shown in the Conceptual Revegetation Plan (Appendix D). An increase in native riparian cover would enhance these areas for wildlife movement by providing concealment from humans, pets, noise, and lighting. Indirect adjacency effects would be further minimized through the proposed buffers and LBZs, which would separate development from open space areas. Also, the project was designed with minimal fencing. No chain-link or similar type of fencing would be permitted; thus, wildlife movement throughout would not be restricted by project fencing. Also, the project would upgrade some of the culverts under Highland Valley Road, which would facilitate improved wildlife movement by increasing capacity and providing directional fencing to aid in wildlife use of the culverts rather than crossing the roadway. With these project design measures, the proposed dedication of 143.7 acres of open space habitat within Area A, preservation and planting of oak trees onsite, preservation of the adjoining acreage within Areas B and C, and enhancement of drainages throughout Area A, potential direct and indirect impacts to wildlife corridors and linkages would be ***less than significant*** per Guideline 6.

3.1.4 Cumulative Impact Analysis

Because Ramona grasslands are a primary biological component of the region, the biological cumulative study area is based on the Ramona Community Planning Area, including the Ramona Grasslands Preserve. The general boundaries of the Ramona Grasslands Preserve are shown in Figure 1-4, and a list of 84 projects with potential biological resources impacts is included in the

Biological Technical Report, with a brief analysis of biological impacts associated with each project (Appendix B). This study area composes a comprehensive and cohesive biological eco-region for cumulative analysis.

The proposed project site is located in a region that is characterized by sparsely developed lands consisting of grasslands, oak woodlands, and chaparral- and CSS-covered hillsides. The expansive grasslands in the Ramona area have historically been maintained by grazing pressure and represent a unique biological resource in the region. These grasslands cover the eastern portion of the project site and form a contiguous habitat throughout the Santa Maria Valley and extend east beyond the Ramona Airport. The grasslands provide extensive foraging habitat for many species of raptors, and support listed species such as Stephens' kangaroo rat.

The area is also characterized by clay soils that sustain vernal pools and their inhabitants (e.g., San Diego fairy shrimp), and also support important populations of sensitive plant species. The Ramona area has been identified as one of the most important areas in the region for vernal pool conservation, and large portions of the area have been designated as critical habitat for San Diego fairy shrimp. The sensitive vernal pools within and surrounding the project area were studied specifically in the Ramona Vernal Pool Conservation Study (Appendix B to the BTR, 2005). The majority of the vernal pools occupied with San Diego fairy shrimp occur on the northern portion of the project site in Area C and within Lot H located in the northwest corner of Area A, all of which would not be affected by the project.

Shrublands and oak woodlands also provide important habitat in the Ramona region. These habitats provide cover, foraging, and nesting for a wide range of wildlife and contribute to the floral diversity of the region. Chaparral and CSS are dominant on the slopes and hillsides in the project area, while open oak woodlands occupy the shadier portions of the valleys. Although the shrublands and woodlands are important biological components of the Ramona area, the grasslands, vernal pools, and Santa Maria Creek corridor are the critical priorities for long-term conservation in the project vicinity.

The NCCP is a cooperative effort to protect habitats and species. The primary objective of the NCCP is to conserve natural communities at the ecosystem scale while accommodating compatible land use. The focus of the initial effort is the CSS habitat of Southern California (County of San Diego 2006b), but it extends to other habitats in the region. The NCCP has authorized, through an extensive planning process, the take of certain resources while protecting and conserving higher quality resources. The NCCP provides compliance with the ESA by achieving regional goals for species conservation in the long-term. All County discretionary projects must comply with NCCP. Cumming Ranch and the cumulative projects must comply

with NCCP preserve design principles, with provisions for wildlife connectivity, and with mitigation requirements consistent with building the future NCMSCP (Section 3.1.3, Ordinance Compliance). Therefore, using the NCCP to support cumulative impact conclusions is reasonable. If the cumulative projects are not consistent with the NCCP, greater impacts than were considered under the NCCP regional analysis would result, and cumulative effects would be considerable. Therefore, most effects on biological resources considered under the NCCP are not cumulatively considerable.

Total anticipated permanent impacts to habitat onsite and offsite from the proposed residential subdivision would primarily include impacts to field/pasture land, but would also include impacts to open Engelmann oak woodland, open coast live oak woodland, individual oak trees, riparian habitats such as cismontane alkali marsh and jurisdictional waters of the U.S., CSS, chaparral communities such as granitic southern mixed chaparral and granitic chamise chaparral, nonnative grassland, eucalyptus woodland, and southern tarplant, for a total of 236.9 acres.

Quantitatively, implementation of recently developed and/or approved and foreseeable projects (detailed in the Biological Technical Report) would result in a permanent loss of approximately 169.9 acres of CSS communities, 22.5 acres of oak woodlands, 536.9 acres of chaparral, 159.9 acres of nonnative grassland, 0.6 acre of southern willow scrub, and 5.4 acres of wetland habitats in the Ramona area (see Biological Technical Report). These projects would collectively result in the loss of 2% of CSS, less than 1% of oak woodland, less than 2% of chaparral, and 2% of nonnative grassland in the Ramona area. However, these projects would be required to comply with applicable NCCP planning documents and the County RPO. Therefore, collective loss of these quantities of CSS, oak woodland, and chaparral are not cumulatively considerable.

The collective loss of 2% of nonnative grassland, including a small amount of the Ramona Grasslands, would be a cumulative impact to this vegetation community in Ramona, in part because it affects a unique resource. Primarily the impact occurs within infill parcels surrounded by development (refer to Figure 1-17). In addition, one major project in the Ramona Grasslands Preserve was withdrawn and purchased by a conservancy (#36, Oak Country). Development of the fringes of the Grasslands may result in fewer edge effects and the potential to preserve blocks of habitat, as is the case for the Cumming Ranch project. However, cumulative impacts to nonnative grassland and other habitats within the Ramona Grasslands would remain potentially significant.

Cumulative projects that comply with the NCCP generally reduce their contribution to cumulative effects because they are required to mitigate their impacts by participating in a plan that requires preservation of linkages and corridors for wildlife connectivity, minimization of loss of habitat and species, and mitigation requirements consistent with building a future

preserve for biological resources. The reference to relying on existing statutory and regulatory obligations as a basis for concluding that a project will not cause impacts was questioned in the comment. The Ramona area has been studied under the Natural Communities Conservation Program (NCCP) for purposes of developing the draft North County Multiple Species Conservation Plan (NCMSCP) and the existing South County MSCP. Cumming Ranch is within the draft NCMSCP. The proposed target for compliance with the draft NCMSCP for projects in areas with high and very high value habitat is to conserve 75 percent of that designated habitat (proposed Pre-Approved Mitigation Area). The Cumming Ranch project achieves the target conservation. Again, it should also be noted that the wildlife agencies agree with the NCCP/HLP Findings for the project dated August 17, 2012, the project's preserve design and the proposed biological mitigation (See November 16, 2012 letter attached as Exhibit A to these responses).

The NCCP has authorized, through an extensive planning process, the continued development of land within certain resource areas while protecting and conserving higher quality resources. Protecting these resources on a regional basis and applying the NCCP Guidelines to individual projects will result in mitigation that contributes to the formation of a regional preserve system, thereby mitigating cumulative impacts to these resources. In addition, some of the cumulative projects are within the South County MSCP, which also provides cumulative mitigation for these resources. The Cumming Ranch project complies with the NCCP (Section 3.1.3, Ordinance Compliance), and the cumulative projects are required to comply with NCCP preserve design principles. Because all County discretionary projects within the boundaries of the NCCP must comply with the NCCP design principles and the entire cumulative study area is within the NCCP boundary, provisions for wildlife connectivity and mitigation requirements consistent with the NCCP have been included for these projects. Consequently, the effects on biological resources are not cumulatively considerable. In summary, although some cumulative impacts within the Ramona Grasslands study area may be significant, the project's contribution to these impacts would not be cumulatively considerable.

In addition, the mitigation ratios required by the County's Report Requirements (2010) generally take into account cumulative effects to the vegetation/habitat types. Impacts are mitigated at a ratio of 1:1 or higher (except for the active agricultural and disturbed areas). These standard habitat/vegetation mitigation ratios have factored in the importance of each type in the overall preservation of declining vegetation types and species. Mitigation ratios are standardized and not dependent upon the quality of habitat. Rather, the mitigation ratios recognize the regional importance of the habitat, its overall rarity, and the number, variety and sensitivity of species it supports. Thus, the overall result is an increase in preserved acreage of habitat relative to that lost (See Section 3.1.3 – Analysis and Table 3.1-4).

As described above, development of the proposed project in conjunction with other future developments would cumulatively affect CSS and various types of grasslands within the Ramona Grasslands, which provide habitat for sensitive species, including the threatened, federally listed coastal California gnatcatcher. Incremental loss of sensitive species habitat may be cumulatively significant. However, design of the proposed project has included the preservation of Areas B and C (314.1 acres) and 143.7 acres in Area A. This acreage would be included in the Ramona Grasslands Preserve. Although the project would contribute to the overall cumulative loss of CSS and nonnative grassland, the preservation of large, contiguous acreage for preservation and inclusion in the Ramona Grasslands Preserve is a positive benefit to the regional conservation effort. For this reason and because the project conforms to the NCCP, the project's contribution to the cumulative loss of nonnative grassland and CSS and to the Ramona Grasslands is not considered considerable.

Several of the projects in this cumulative analysis have or would likely impact vernal pools. While not included on the cumulative project list, the Olive Peirce Middle School and Ramona High School projects included plans to implement vernal pool enhancement and management programs to mitigate impacts to vernal pools. Because of the Countywide rare status of vernal pools and the even more rare status of Ramona vernal pools, any direct impact would be significant at the project and cumulative levels. However, implementation of the proposed project would not impact vernal pool habitat and, therefore, the proposed project would not contribute to potentially significant cumulative impacts to vernal pools (TAIC and EDAW 2005). In addition, the project would serve to further the protection of vernal pools through the provision of additional buffer acreage around the sensitive vernal pool area onsite. Spreading navarretia, a federally listed botanical species, was identified during recent surveys of the vernal pools. This plant species occurs in Area C (Ramona Vernal Pool Preserve), where no impacts, cumulative or project-specific, would occur.

Cumulatively, incremental impacts to wetlands may become significant when paired with other projects throughout the region. However, as shown in Tables 3.1-6 through 3.1-8, regulated waters and wetlands project impacts would be mitigated with ratios ranging from 1:1 to 3:1, and would result in an overall increase of acreage once mitigation is established. In addition, impacts to wetlands must be approved by the agency that has proper jurisdiction. Each agency, such as ACOE and RWQCB, would consider cumulative impacts to waters of the U.S. when authorizing permits. These agencies require mitigation to result in "no net loss" of wetlands. For these reasons, cumulative impacts to federal, state, and County RPO protected wetlands would be less than significant.

While the project would impact 3.70 acres of southern tarplant, no other cumulative project would impact southern tarplant. The Ramona Airport project had proposed improvements that could have resulted in impacts to southern tarplant; however, those improvements have been withdrawn. Therefore, the proposed project would not contribute to cumulative impacts to southern tarplant.

A direct project impact would result to 11 Engelmann oaks and four coast live oaks. The impacts to these 15 oak trees would be mitigated at a 2:1 ratio, resulting in the planting of 30 oak trees throughout the open space of Area A. This mitigation ratio would increase the number of oak trees on the project site, thus reducing the project's impact and any potential cumulative impact to sensitive Engelmann oaks.

Federal, state, and County policies require that projects have no net loss of riparian vegetation communities, including southern willow scrub, mulefat scrub, cismontane alkali marsh, and nonvegetated channels. The proposed project would mitigate impacts to southern willow scrub, mulefat scrub, and cismontane alkali marsh at an acreage based on a ratio of 3:1. Nonvegetated channels would be mitigated at an acreage ratio of 3:1. That means that for every 1 acre of wetland impact, at least 2 acres of the affected habitat must be created elsewhere, and the remaining balance must be enhanced at the impact location at the 1:1 ratio. The proposed project, in addition to all other cumulative projects resulting in impacts to southern willow scrub, mulefat scrub, cismontane alkali marsh, and nonvegetated channels, are also required to comply with these policies for wetland creation and mitigation. Therefore, there would be no net loss to wetlands due to mitigation, and there would be no cumulative impact to these habitat types.

The project would not adversely impact raptor foraging or nesting within Ramona grasslands. The project site does not currently support migratory nesting raptors. Large blocks of open space would be dedicated within Area A, B, and Area C. In addition, the recent purchase of the adjoining offsite acreage for preservation would ensure that raptor foraging and potential nesting sites are protected in perpetuity.

Another important biological resource in the Ramona area is Santa Maria Creek. This intermittent creek flows approximately east to northwest through the developed and undeveloped areas of the Ramona community. Although few sections of this creek support well-developed riparian habitat, this feature provides an important regional corridor for wildlife movement. Downstream of the project, segments of the creek are known to support populations of listed species such as arroyo toad. Santa Maria Creek traverses the project site from east to west across Areas B and C. The project would not adversely impact the primary wildlife linkages (Santa Maria Creek and Etcheverry Creek). All portions of the project are at least 600 feet from Santa

Maria Creek as it runs through Hardy Ranch and 2,500 feet from Etcheverry Creek as it runs through the project's open space. Therefore, the project would not contribute cumulatively to impacts to wildlife movement. With the preservation of Areas B and C and the drainages throughout Area A, wildlife linkages along Santa Maria Creek to the Ramona Grasslands Preserve and along Etcheverry Creek leading to the rural areas southeast of the project would be maintained. Buffers would reduce edge effects, and proposed enhancements would be beneficial in providing additional coverage to wildlife species that use these areas for movement within the site and through the site to access offsite areas.

Cumulative impacts to the overall biological community related to habitat loss and listed and sensitive species impacts, as well as expected traffic, noise, lighting, air pollution, urban storm water runoff and pollution, and other contributory factors, may be significant. Project impacts to sensitive habitat, vegetation, and/or species would occur on the fringe of highly concentrated resources. Ramona Town Center is adjacent to the project, and residential developments surround most of the project site. The proposed donation of Area C as open space and the proposed Area B option to purchase for open space/preserve ties in with the adjoining properties (Hardy Ranch and Cagney Ranch) and other nearby properties purchased for preservation in the Ramona Grasslands Preserve, thus providing key acreage toward a cohesive and preserved grassland ecosystem. Absent compliance with appropriate policies and ordinances on the part of all future projects would be a significant cumulative impact for each significance criteria. The appropriate agencies require that developments incorporate mitigation measures to decrease their individual and collective impact on sensitive species. With incorporation of applicable mitigation measures and project design features, the cumulative contribution of the Cumming Ranch project to biological resources would not be considerable, or ***less than significant*** per Guideline 8.

3.1.5 Mitigation Measures

M-BI-1 through M-BI-11 Impacts to Sensitive Vegetation Communities

a. The primary mitigation acreage for the project would be located within Area A open space, with additional mitigation acreage located within Areas B and C. Open space lots A, B, C, D, E, F, and H in Area A were not included as mitigation acreage, as they are considered isolated and are impact-neutral areas. Mitigation acreage shall be provided through the permanent dedication of open space land and the provision of an open space easement over this land according to the ratios provided in Table 3.1-5. The open space lots throughout Area A are shown in Figure 1-5 and open space easements are shown on Figure 1-16, Open Space Map.

b. The RMP shall be approved and funded for the open space area prior to the approval of a Final Map and any plan or permit for the project. The RMP provides for the monitoring and management of habitats and species such as oak tree replacement, habitat creation, species surveys and monitoring, and other efforts involved in the day-to-day management of the open space area (e.g., budget control and analysis, debris removal, exotic weed removal, general maintenance of any open space signage, etc.). The RMP includes performance standards to measure the success of mitigation (e.g., percent improvements over time, success rates, etc.), and shall include (1) construction monitoring of trails in the field as necessary to minimize impact from trail use; (2) wet condition installation of trail barriers crossing creeks; (3) trail repair (recommend and monitor installation of preventative bio-engineered erosion control devices, repair erosion damage, remove sediment); (4) monitoring and management of the open space easements and coordination with the HOA to educate residents about the prohibitions and the resource sensitivity of the area. The monitoring and management of these lands shall be conducted in perpetuity.

Mitigation Measure M-BI-1 Direct Effects to Open Engelmann Oak Woodland

Impacts to 0.20 acre of open Engelmann oak woodland shall be mitigated through the in-kind preservation of existing Engelmann oak woodland onsite in Area A open space at a 3:1 ratio for a total of 0.60 acre (see Table 3.1-5 and Table 3.1-9). All necessary mitigation acreage is available on the project site.

Mitigation Measure M-BI-2 Direct Effects to Open Coast Live Oak Woodland

Impacts to 0.06 acre of open coast live oak woodland shall be mitigated through the preservation of existing Engelmann oak woodland onsite in Area A open space (including acreage preservation and RMP requirements as detailed in **Mitigation Measure M-BI-1**) at a 3:1 ratio for a total of 0.18 acre (see Table 3.1-5 and Table 3.1-9). All necessary mitigation acreage is available on the project site.

Mitigation Measure M-BI-3 Direct Effects to Southern Willow Scrub

Impacts to 0.05 acre of southern willow scrub shall be mitigated onsite in Area A open space (including acreage preservation and RMP requirements as detailed in **Mitigation Measure M-BI-1**) at a 3:1 ratio for a total of 0.15 acre (see Table 3.1-5). Of the 3:1 ratio, 1:1 shall include onsite restoration at impact locations where feasible. This shall entail the removal and stockpiling of topsoil during construction and then replacing it over the impact area after construction. The impact area shall be recontoured to preconstruction grade, and the impact

area shall be seeded with appropriate wetland plants. The remaining 2:1 ratio shall include onsite creation or restoration of wetland habitat or at a 3:1 ratio if the impact area cannot be restored. The Revegetation Plan shall detail the performance measures for creation and restoration (see **Mitigation Measure M-BI-12**).

Mitigation Measure M-BI-4 Direct Effects to Mulefat Scrub

Impacts to 0.05 acre of mulefat scrub shall be mitigated onsite in Area A open space (including acreage preservation and RMP requirements as detailed in **Mitigation Measure M-BI-1**) at a 3:1 ratio for a total of 0.15 acre (see Table 3.1-5). Of the 3:1 ratio, 1:1 shall include onsite restoration at impact locations where feasible. This shall entail the removal and stockpiling of topsoil during construction and then replacing it over the impact area after construction. The impact area shall be recontoured to preconstruction grade and the impact area shall be seeded with appropriate wetland plants. The remaining 2:1 ratio shall include onsite creation or restoration of wetland habitat or at a 3:1 ratio if the impact area cannot be restored. The Revegetation Plan shall detail the performance measures for creation and restoration (see **Mitigation Measure M-BI-12**).

Mitigation Measure M-BI-5 Direct Effects to Cismontane Alkali Marsh

Impacts to 1.02 acres of cismontane alkali marsh shall be mitigated onsite in Area A open space (including acreage preservation and RMP requirements as detailed in **Mitigation Measure M-BI-1**) at a 3:1 ratio for a total of 3.06 acres (see Table 3.1-5). Of the 3:1 ratio, 1:1 shall include onsite restoration at impact locations where feasible. This shall entail the removal and stockpiling of topsoil during construction and then replacing it over the impact area after construction. The impact area shall be recontoured to preconstruction grade and the impact area shall be seeded with appropriate wetland plants. The remaining 2:1 ratio shall include onsite creation or restoration of wetland habitat or at a 3:1 ratio if the impact area cannot be restored. The Revegetation Plan shall detail the performance measures for creation and restoration (see **Mitigation Measure M-BI-12**).

Mitigation Measure M-BI-6 Direct Effects to Nonvegetated Channel

Impacts to 0.03 acre of nonvegetated channel shall be mitigated onsite in Area A open space at a 3:1 ratio where the impact occurs (see Table 3.1-5) for a total of 0.09 acre. Creation and/or restoration mitigation shall occur where practicable onsite within Area A. The Revegetation Plan shall detail the performance measures for creation and restoration (see **Mitigation Measure M-BI-12**).

Mitigation Measure M-BI-7 Direct Effects to CSS

Impacts to 26.34 acres of CSS shall be mitigated through the preservation of existing CSS onsite in Areas A and B open space at a 2:1 ratio for a total of 52.68 acres of CSS (see Table 3.1-5). All necessary mitigation acreage is available on the project site.

Mitigation Measure M-BI-8 Direct Effects to Granitic Southern Mixed Chaparral

Impacts to 19.35 acres of granitic southern mixed chaparral shall be mitigated through the preservation of existing granitic southern mixed chaparral onsite in Area A open space (including acreage preservation and RMP requirements as detailed in **Mitigation Measure M-BI-1**). Mitigation shall be at a 0.5:1 ratio for a total of 9.68 acres (see Table 3.1-5). All necessary mitigation acreage is available on the project site.

Mitigation Measure M-BI-9 Direct Effects to Granitic Chamise Chaparral

Impacts to 4.05 acres of granitic chamise chaparral shall be mitigated through the preservation of existing granitic chamise chaparral onsite in Area A open space (including acreage preservation and RMP requirements as detailed in **Mitigation Measure M-BI-1**). Mitigation shall be at a 0.5:1 ratio for a total of 2.03 acres (see Table 3.1-5 and Table 3.1-9). All necessary mitigation acreage is available on the project site.

Mitigation Measure M-BI-10 Direct Effects to Nonnative Grassland

Impacts to 12.94 acres of nonnative grassland shall be mitigated through the preservation of existing nonnative grassland onsite in Areas A, B, and C open space (including acreage preservation and RMP requirements as detailed in **Mitigation Measure M-BI-1**). Mitigation shall be at a 1:1 ratio for a total of 12.94 acres (see Table 3.1-5 and Table 3.1-9). All necessary mitigation acreage is available on the project site.

Mitigation Measure M-BI-11 Direct Effects to Field/Pasture

Impacts to 164.95 acres of field/pasture shall be mitigated through the preservation of existing nonnative grassland onsite in Areas A, B, and C open space (including acreage preservation and RMP requirements as detailed in **Mitigation Measure M-BI-1**). Mitigation shall be at a 0.5:1 ratio for a total of 82.68 acres (see Table 3.1-5 and Table 3.1-9). Impacts in Area B from the sewerline shall be at a 1:1 ratio. All necessary mitigation acreage is available on the project site.

<u>Mitigation Measure M-BI-12</u> Direct and Indirect Effects to Wetlands and Waters of the U.S.

a. On and offsite impacts to 0.13 acre of ACOE waters and wetlands shall be mitigated onsite in open space easements at a 3:1 ratio. Proposed mitigation for wetlands shall consist of a 3:1 ratio where 1:1 shall include onsite restoration at impact locations and 2:1 shall include onsite creation or restoration of habitat. Creation and/or restoration mitigation shall occur as detailed in the Revegetation Plan for 3.48 acres of riparian habitat/vegetation on the project site. The Conceptual Revegetation Plan is included in Appendix D.

   On and offsite impacts to 1.18 acres of CDFG wetlands and 1.18 acres of County RPO waters and wetlands shall be mitigated onsite in Area A open space at a 3:1 ratio. Proposed mitigation for wetlands shall consist of a 3:1 ratio where 1:1 shall include onsite restoration at impact locations and 2:1 shall include onsite creation or restoration of habitat. Creation and/or restoration mitigation shall occur as detailed in the Revegetation Plan for 3.48 acres of riparian habitat/vegetation on the project site. Appropriate RPO wetland buffers shall be incorporated and shall be a minimum of 50 feet from the edge of the wetlands in accordance with the 2007 RPO.

   The Revegetation Plan shall also include establishment of 22 Engelmann and 8 coast live oak trees and the southern tarplant seed harvest and redistribution over 3.7 acres (Mitigation Measures M-BI-13 and 14).

b. The Revegetation Plan shall require approval by the appropriate agencies prior to issuance of grading permits for the project. A conceptual draft of this plan is provided in Appendix D. The Revegetation Plan details the performance measures for creation and restoration of wetlands and wetland habitats. The Revegetation Plan requires a bond be issued to the County to cover the full cost of the revegetation by the developer (to be released at the end of a successful monitoring period). Creation, restoration, and/or enhancement of wetland habitats shall occur throughout various sections of the unnamed drainages within the planned Area A open space area. In addition to a Revegetation Plan for 3.48 acres of riparian habitat/vegetation on the project site, the RMP developed for the open space area shall be approved and funded prior to the approval of a grading permit for the project **(Mitigation Measures M-BI-1b through -11b)**.

c. To address indirect impacts to RPO wetlands associated with maintenance activities, the RMP for this project shall require installation, inspection, and maintenance of appropriate best management practices (BMPs).

d. For the future trail in Area B, a resurvey of the alignment prior to approval of the final map is proposed to determine if wetland impacts can be further minimized. Although the impacts for the trail in Area B have been evaluated and fully mitigated, the following has been applied to the project as a condition of approval: Prior to finalizing the alignment on the final map, a County-approved biologist and the project engineer would survey and may recommend adjusting the trail and sewer alignment (20-feet wide) in Area B to deviate not more than 100 feet south of the approved location on the tentative map. Changes to the alignment must reduce biological impacts by moving the trail away from alkali marsh to agricultural land or by increasing the width of the wetland buffer along Santa Maria Creek. The survey and alignment recommendations shall be done prior to approval of the final map and be reviewed and approved by DPLU (sewer) and DPR (trails). The applicant is only responsible for granting an easement for the trail in Area B because this trail would be constructed in the future by DPR in coordination with the Ramona Grasslands Preserve Public Access Plan. The applicant is responsible for construction of trails in Area A and Hardy Ranch. During construction of the trails, the Resource Manager under the RMP may make minor adjustments within the 20-foot wide alignment to further minimize impacts from trail use.

e. Prior to approval of a grading plan, evidence of applicable permits (or verification that permits are not required) shall be provided to the County.

f. During wet conditions, the Resource Manager will evaluate creek crossings and may restrict their use with barriers when water flow is an issue for user safety or trail stability or there is a potential for trail damage. The Resource Manager will recommend and oversee installation of preventive bioengineered erosion control devices (such as vegetated swales and permeable pavers), repair erosion damage, and remove sediment from trail crossings as necessary.

Mitigation Measure M-BI-13 Direct Effects to Individual Oaks

Direct impacts to Engelmann oaks and coast live oaks shall be mitigated at a 2:1 replacement ratio. The replacement of 22 Engelmann oak and eight coast live oak trees shall occur within Area A open space lots. A Revegetation Plan with monitoring and success criteria has been prepared and shall be submitted for resource agency approval. The success of these trees shall be monitored for no less than 3 years in accordance with all Revegetation Plan requirements (**Mitigation Measure M-BI-12a**).

<u>Mitigation Measure M-BI-14</u> Direct Effects to Southern Tarplant

a. Impacts to 3.7 acres of southern tarplant shall be mitigated with preservation and management of approximately 21 acres of the onsite population within Areas A and B open space.

b. In addition, a Revegetation Plan shall be implemented to provide for an expansion of the population on 3.7 acres of suitable habitat in the managed open space. The Revegetation Plan shall include provisions for seed to be harvested from impacted areas and distributed on approximately 3.7 acres onsite adjacent to those areas known to support this species. The Revegetation Plan shall also include measures for the southern tarplant that will be directly affected by sewer line installation (0.2 acre), to be implemented to retain the topsoil and return it to the same location to allow for regrowth of this species.

   The RMP includes monitoring and management provisions of the open space, which provides assurances for the long-term protection and enhancement of sensitive species and resources. The RMP establishes site-specific measures to enhance the population numbers and distribution of southern tarplant, including seed harvest from impacted areas and distribution on approximately 3.7 acres onsite in areas adjacent to those known to support this species. Overall, the mitigation shall achieve a no-net-loss for this species (**Mitigation Measures M-BI-1 through -11**).

<u>Mitigation Measure M-BI-15</u> Direct Effects to Sensitive Animals

a. Direct impacts to sensitive herpetofaunal species habitat shall be mitigated with preservation of habitat onsite within Areas A and B open space lots for western spadefoot toad; arroyo toad; San Diego horned lizard; granite spiny lizard; granite night lizard; coastal California whiptail; and orange-throated whiptail as required under **Mitigation Measures M-BI-1 through M-BI-12**. The preservation of appropriate habitat for these herpetofaunal species would reduce the impact to below a level of significance.

   To minimize potential impacts specific to arroyo toad, the following measure shall be implemented: Prior to any grading, an arroyo toad biologist shall examine the impact areas to determine if any portions of the site have suitable habitat for occupation by arroyo toad. Upon agreement with USFWS, a protocol survey may or may not be required. If surveys determine that there are no arroyo toads present, no further action would be necessary. If it is determined that arroyo toads are present, then a FESA take permit shall be obtained. Permit conditions would include monitoring and species avoidance measures during construction, and may include dedication of open space easements over suitable habitat in

Area B, open space habitat enhancements, and/or endowment for conservation as a condition of the FESA take permit.

b. Direct impacts to sensitive mammalian species habitat shall be mitigated onsite within Area A open space lots for mountain lion; American badger; San Diego desert woodrat; San Diego black-tailed jackrabbit; and southern mule deer, as required under **Mitigation Measures M-BI-1 through M-BI-12**.

Prior to any grading, a qualified biologist shall examine the impact areas to determine if any portions of the site have suitable habitat for occupation by Stephens' kangaroo rat. Upon agreement with USFWS, a protocol survey may or may not be required. If surveys determine that there are no Stephens' kangaroo rat present, no further action would be necessary. If it is determined that Stephens' kangaroo rat are present, then a FESA take permit shall be obtained. Permit conditions would include monitoring and species avoidance measures during construction, mitigation credits over suitable habitat in Area B, open space habitat enhancements, and/or endowment for conservation, at a 2:1 occupied habitat ratio, as a condition of the FESA take permit.

c. Direct impacts to sensitive avian species habitat shall be mitigated onsite within Area A open space lots for Canada goose; turkey vulture; white-tailed kite; northern harrier; golden eagle; Cooper's hawk; red-shouldered hawk; ferruginous hawk; loggerhead shrike; great horned owl; burrowing owl; zone-tailed hawk; red-tail hawk; rough-legged hawk; American kestrel; and barn owl, as required under **Mitigation Measures M-BI-1 through M-BI-12**.

d. To avoid potential construction impacts specific to burrowing owls, tree nesting raptors, California gnatcatchers, and migratory songbirds for the final map shall require:

(1) During the breeding season, February 1 through August 31, no brushing, clearing, and/or grading shall be allowed. The Director of DPLU may waive this condition, provided there are no active owl burrows within 800 feet of the brushing, clearing, or grading, as determined by take avoidance (preconstruction) surveys conducted from 14 days to within 24 hours before the initial brushing, clearing, and grading, and ongoing weekly burrowing owl monitoring surveys (according to County or CDFG protocols). After young owls have fledged, or from September 1 through January 31, protocol preconstruction surveys and weekly monitoring throughout grading operations shall be conducted to determine if owls are present in the burrows. If present, a qualified biologist shall implement passive relocation measures in accordance with CDFG Staff Report (CDFG 2012) and wildlife agency concurrence. If no owls are present, grading activities may continue, with weekly burrowing owl monitoring surveys to ensure that no new burrows are occupied.

(2) All brushing, clearing, and/or grading shall be restricted such that no grading or clearing will be allowed within 500 feet of tree-nesting raptors in the project area. The developer shall have raptor nest surveys conducted prior to tree cutting or grading near mature trees to ensure that active nests are not present. A qualified biologist shall conduct the surveys between January 15 and August 31, and prepare a survey report. If no raptor nests are discovered in the trees to be removed, no further mitigation shall be required. If any active raptor nests are discovered, the biologist shall mark all occupied trees and delineate a 500-foot buffer area around each occupied tree. No construction activity shall occur within the 500-foot buffer until the young have fledged, as determined by a qualified biologist.

(3) All brushing, clearing, and/or grading shall be restricted such that no grading or clearing shall be allowed within 300 feet of occupied coastal sage scrub during the avian breeding season (January 15 through August 31). This measure may be waived if pre-grading surveys show that no gnatcatchers are present in or within 300 feet of the area to be brushed, cleared, or graded.

(4) All brushing, clearing, and/or grading shall be restricted such that no grading or clearing shall be allowed to "take" any active migratory bird nest during the breeding season (January 15 through August 31). This measure may be waived if pre-grading surveys show that there are no active migratory bird nests in the area to be brushed, cleared, or graded. If construction is halted for a period of fourteen days or more during the avian nesting season, a biological survey of the habitat within 500 feet of proposed construction site shall be required prior to restarting construction.

The above measures shall be noted on all grading and improvement plans.

Mitigation Measure M-BI-16 Indirect Effects of Project Construction

The following resource protection measures shall be implemented by the developer to ensure that indirect impacts to sensitive vegetation communities and sensitive plants do not occur.

a. A County approved biologist shall perform monitoring duties before, during, and after construction to ensure against damage to biological resources that are intended to be protected and preserved. The monitor shall be onsite during all grading and clearing activities that are in or adjacent to any biological open space areas or sensitive habitats. If there are disturbances, the monitor must report them immediately to the DPLU Permit Compliance Coordinator. Additionally, the biologist shall monitor fencing and erosion control measures, monitor equipment maintenance, staging, and fuel dispensing areas, stop or divert work when deficiencies require mediation, and attend construction meetings. When

all grading activities have been completed, the biologist shall prepare and submit a final letter report.

b. Prior to commencement of construction, the limits of each phase of project construction shall be clearly delineated with temporary fencing by a survey crew. Onsite, the temporary fencing shall be required when grading is proposed within 100 feet of open space. Offsite, temporary fencing shall be installed to indicate the allowable limits of grading, clearing, and staging areas. The limits shall be checked by the biological monitor before initiation of clearing or construction. The project biologist shall submit a letter to the County indicating that the limits of construction have been checked and work can commence.

c. Activities, including staging areas, equipment access, and disposal or temporary placement of excess fill, shall be prohibited within drainages, sensitive habitats, or sensitive plant populations outside of the identified construction area.

d. Erosion and siltation into offsite areas during construction shall be minimized through the implementation of an erosion control plan. The contractor shall prepare an erosion control plan for approval by the County. The contract supervisor shall be responsible for ensuring that the erosion control plan is developed and implemented.

e. Construction access shall utilize existing developed areas or be within the identified construction area. Contractors shall clearly mark all access routes (i.e., flagged and/or staked) prior to the onset of construction.

f. To avoid sensitive habitats, construction staging areas, equipment refueling areas, and other areas for equipment and materials storage shall be located within the identified construction area. To avoid inadvertent impacts to sensitive biological resources that may be present, storage and access areas shall be displayed on the approved project plans and specifications.

g. Biological monitoring shall be required where impacts occur in proximity to proposed open space and other sensitive habitat and resources as determined by the project biologist.

h. Biological monitoring shall be required along the alignment of the on and offsite infrastructure construction.

i. For the future trail in Area B, a resurvey of the alignment prior to approval of the final map is proposed to determine if wetland impacts can be further minimized. Although the impacts for the trail in Area B have been evaluated and fully mitigated, the following has been applied to the project as a condition of approval: Prior to finalizing the alignment on the final map, a County-approved biologist and the project engineer would survey and may recommend adjusting the trail and sewer alignment (20-feet wide) in Area B to deviate not more than 100 feet south of the approved location on the tentative map. Changes to the

alignment must reduce biological impacts by moving the trail away from alkali marsh to agricultural land or by increasing the width of the wetland buffer along Santa Maria Creek. The survey and alignment recommendations shall be done prior to approval of the final map and be reviewed and approved by DPLU (sewer) and DPR (trails). The applicant is only responsible for granting an easement for the trail in Area B because this trail would be constructed in the future by DPR in coordination with the Ramona Grasslands Preserve Public Access Plan. The applicant is responsible for construction of trails in Area A and Hardy Ranch. During construction of the trails, the Resource Manager under the RMP may make minor adjustments within the 20-foot wide alignment to further minimize impacts from trail use.

j. The above measures shall be noted on all grading and improvement plans.

Mitigation Measure M-BI-17 Indirect Effects of Project Occupation

a. The dedicated LBZ easements on each lot shall prohibit: (1) animal keeping without effective restraints or fencing, (2) lighting, (3) exotic invasive landscaping (4) focal use areas including arenas, pools, and patios, and (5) all structures, unless written verification is obtained from the County Fire Marshal that the structure will not require fuel modification to extend into biological open space. The LBZ easements shall require large animals to be kept within fences.

b. Open space signage, in accordance with County policy, shall be installed prior to grading activities and shall be maintained and replaced as needed under provisions within the RMP. Signs shall be located every 50 feet along all open space edges in conjunction with the residential lot LBZ and where open space is adjacent to internal streets, pathways, and trails. The signage shall have the following language or similar on it:

"Sensitive Environmental Resources
Area Restricted by Easement
Entry without express written permission from the County of San Diego
is prohibited. To report a violation or for more information about easement
restrictions and exceptions, contact the County of San Diego,
Department of Planning and Land Use
Reference: (*3810-03-005*)"

Upon completion of the installation of the open space signage, the project engineer shall submit a signed statement to the County indicating that all signs are in place.

c. The RMP resource manager shall monitor and manage the open space easements and work with the HOA to educate residents and trail users about the prohibitions and the resource sensitivity of the area.

3.1.6 Conclusions

With implementation of the mitigation measures listed in Section 3.1.5, biological resource impacts would be reduced to less-than-significant levels for the proposed project. **Mitigation Measures M-BI-1 through M-BI-11** address direct impacts to sensitive vegetation communities. These direct impacts are mitigated to ***less-than-significant*** levels because compensatory habitat would be preserved and managed on the project site at an appropriate ratio for the sensitivity of each individual vegetation type.

Impact BI-12 to wetlands and waters of the U.S. would be mitigated through a combination of onsite wetland restoration and onsite creation, as detailed in **Mitigation Measure M-BI-12**. A Revegetation Plan was prepared and would be implemented to monitor the success of the wetland mitigations to ensure certain performance criteria are met. **Mitigation Measure M-BI-12** also includes further minimization of wetland impacts by requiring a survey be done and recommending alignment adjustments based on the survey, if needed, be implemented on the map prior to approval of the Final Map. The mitigation would result in a larger wetland buffer and reduced wetland vegetation impacts. These measures would reduce wetland and waters of the U.S. impacts to ***less than significant*** because onsite creation and restoration of wetlands would enhance the biological function, would result in a no-net-loss of wetlands, and wetland permits would be obtained from the appropriate regulatory agencies. In addition, the project applicant would provide for the long-term preservation and management of the onsite revegetation area.

Mitigation Measure M-BI-13 would enhance community-level mitigation for impacts to Engelmann and coast live oak trees (oak woodland is mitigated by **Mitigation Measures M-BI-1 and M-BI-2**). The impact to individual oak trees would be mitigated to ***less than significant*** because trees that must be removed and trees that are not protected within an open space easement would be replaced with the planting of oaks at a 2:1 ratio on the project site through implementation of the Revegetation Plan. The result would be the addition of 30 trees in the biological open space of Area A.

Impact BI-14 would remove 3.7 acres of habitat containing southern tarplant. This impact would be mitigated through preservation and management of 21 acres of tarplant habitat and restoration of an additional 3.7 acres within the biological open space area. These measures,

coupled with monitoring for success of the habitat restoration mitigation, would reduce direct impacts to this sensitive plant species to ***less than significant*** because there would be a no-net-loss of tarplant habitat and adequate long-term preservation and management of the species.

Impact BI-15 to the sensitive animal species known to occur on the project site would be mitigated to ***less than significant*** through habitat-based mitigation because the project incorporates large acreage of open space that is contiguous with the Ramona Grasslands Preserve for preservation and management in perpetuity. Areas B and C would remain undeveloped, and biological resource areas in Area A would be preserved and managed as open space. Important biological features, including all drainages, the Santa Maria Creek, Etcheverry Creek, rock outcroppings, the main ridgeline through the site, and stands of oak trees, would be preserved and continue to function as habitat for wildlife. In addition, **Mitigation Measure M-BI-15** requires preconstruction surveys and construction limitations to ensure that no raptors (including burrowing owls), gnatcatchers, Stephens' kangaroo rat, or arroyo toads be affected during construction. In addition, construction avoidance measures, such as breeding season restrictions and construction fencing, are required and dedication of mitigation credits over suitable habitat in Area B, open space habitat enhancements, and/or endowment for conservation, at a 2:1 occupied habitat ratio, as a condition of the FESA take permit, if necessary. The RMP would monitor sensitive species and manage habitat to maintain the ability for these species to use the Cumming Ranch property in perpetuity.

Mitigation Measure M-BI-16 provides multiple requirements to reduce the potential for indirect impacts during construction. Measures such as fencing and clear demarcation of work areas, biological monitoring during construction activities, pre-design surveys of trail locations, and construction limitations during the avian breeding season would ensure that construction-related impacts do not extend beyond what is anticipated; therefore, potential indirect impacts would be reduced to ***less than significant*** by containing construction activities to the appropriate areas.

Mitigation Measure M-BI-17 provides multiple requirements to reduce the potential for indirect impacts during project occupation. Potential indirect impacts of project occupation are mitigated through project design, dedication of an LBZ easement to protect open space areas, provision of permanent open space signage, and implementation of the RMP. Indirect effects of project operation would be reduced to ***less than significant*** because the RMP prescribes management requirements for all open space areas, including signage to be posted to inform residents and trail users of sensitive environmental areas, notifying them that they may not enter the sensitive areas, and because the project was designed to reduce the potential for indirect effects from residents, pets, and other impacts through features such as natural buffers and LBZ use limitations.

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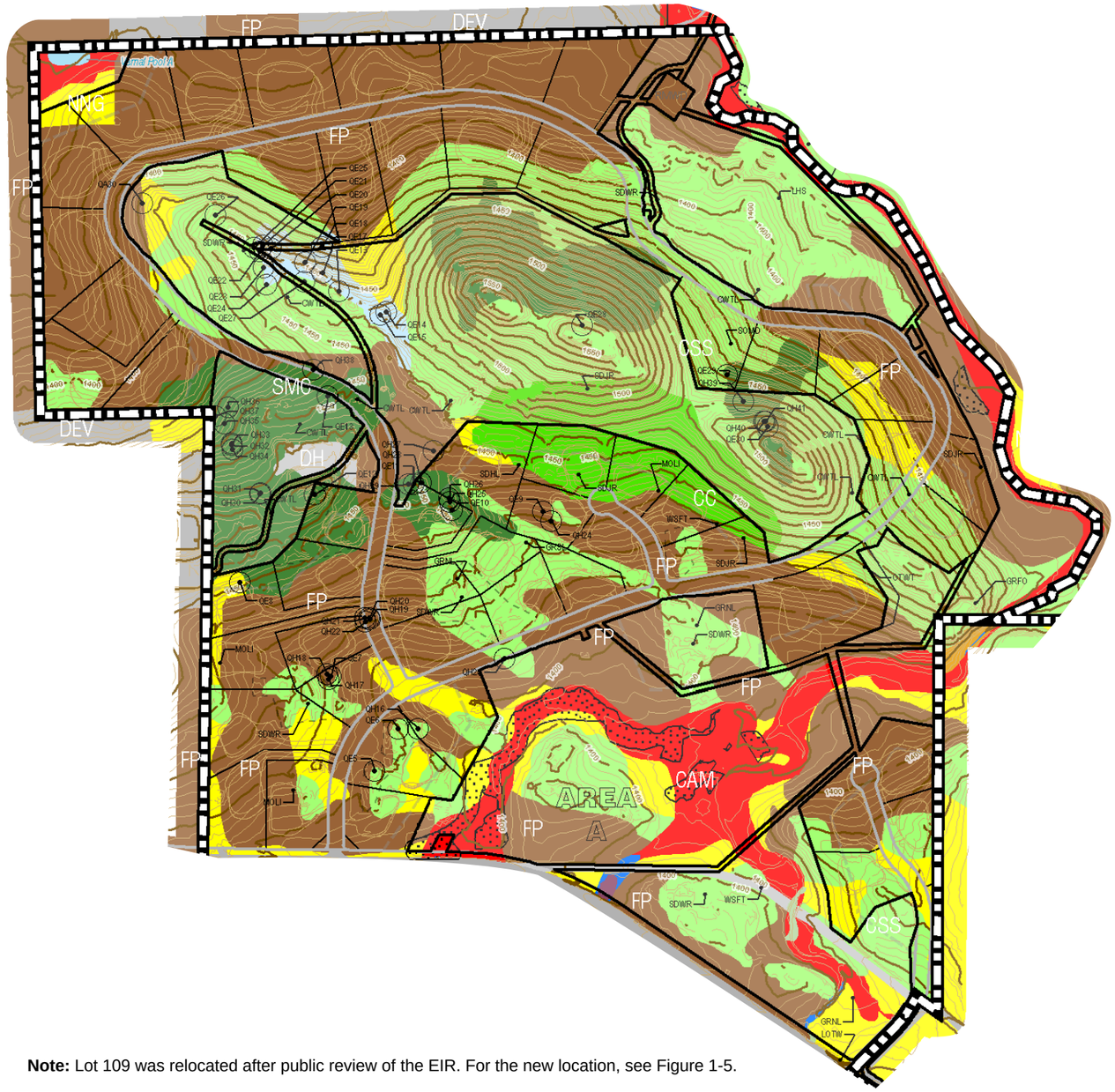
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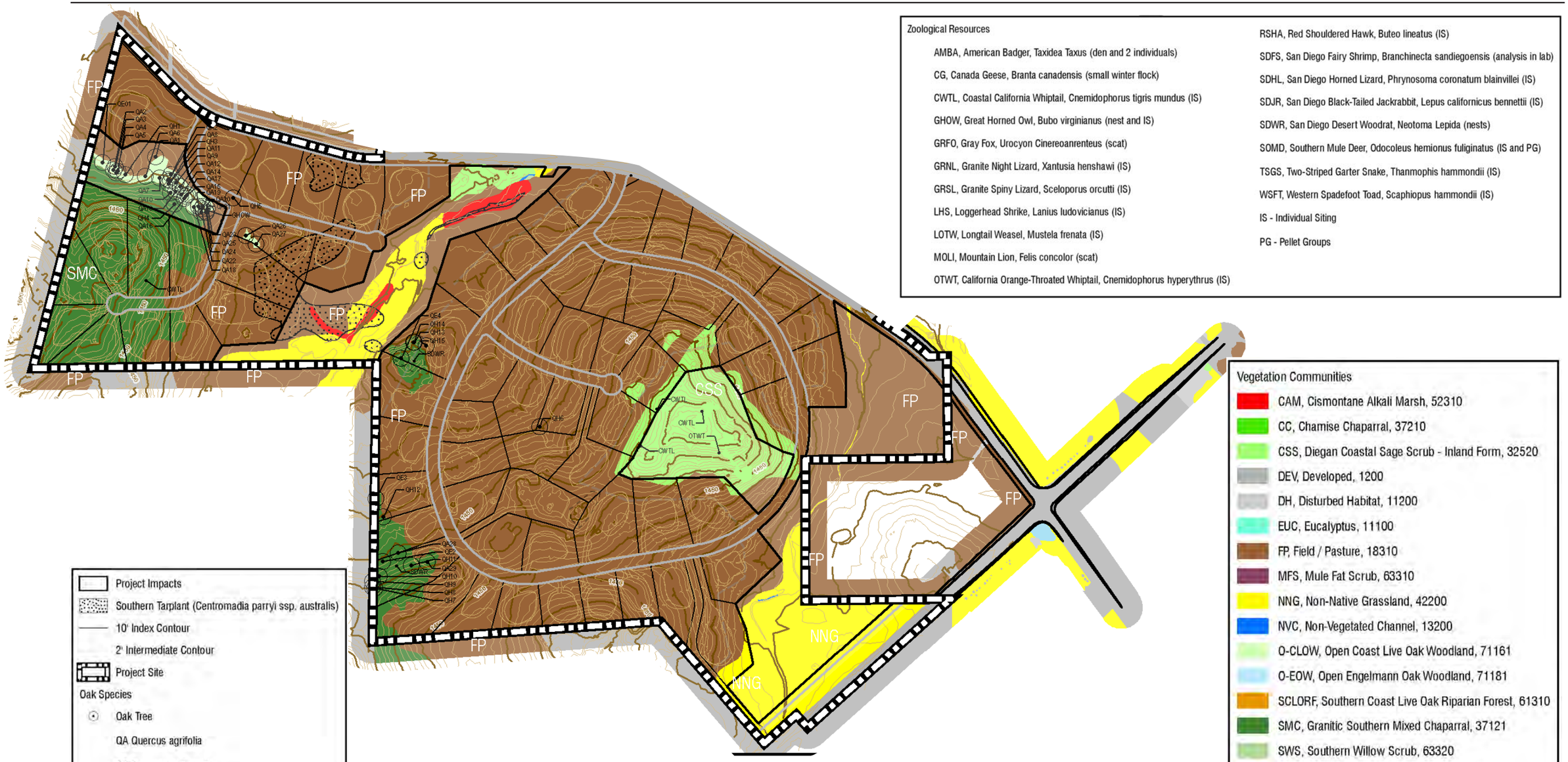

Zoological Resources

AMBA, American Badger, Taxidea Taxus (den and 2 individuals)

CG, Canada Geese, Branta canadensis (small winter flock)

CWTL, Coastal California Whiptail, Cnemidophorus tigris mundus (IS)

GHOW, Great Horned Owl, Bubo virginianus (nest and IS)

GRFO, Gray Fox, Urocyon Cinereoanrenteus (scat)

GRNL, Granite Night Lizard, Xantusia henshawi (IS)

GRSL, Granite Spiny Lizard, Sceloporus orcutti (IS)

LHS, Loggerhead Shrike, Lanius ludovicianus (IS)

LOTW, Longtail Weasel, Mustela frenata (IS)

MOLI, Mountain Lion, Felis concolor (scat)

OTWT, California Orange-Throated Whiptail, Cnemidophorus hyperythrus (IS)

RSHA, Red Shouldered Hawk, Buteo lineatus (IS)

SDFS, San Diego Fairy Shrimp, Branchinecta sandiegoensis (analysis in lab)

SDHL, San Diego Horned Lizard, Phrynosoma coronatum blainvillei (IS)

SDJR, San Diego Black-Tailed Jackrabbit, Lepus californicus bennettii (IS)

SDWR, San Diego Desert Woodrat, Neotoma Lepida (nests)

SOMD, Southern Mule Deer, Odocoleus hemionus fuliginatus (IS and PG)

TSGS, Two-Striped Garter Snake, Thanmophis hammondii (IS)

WSFT, Western Spadefoot Toad, Scaphiopus hammondii (IS)

IS - Individual Siting

PG - Pellet Groups

Project Impacts

Southern Tarplant (Centromadia parryi ssp. australis)

10' Index Contour

2' Intermediate Contour

Project Site

Oak Species

Oak Tree

QA Quercus agrifolia

QE Quercus englmanii

QH Quercus hybrid

Vegetation Communities

CAM, Cismontane Alkali Marsh, 52310

CC, Chamise Chaparral, 37210

CSS, Diegan Coastal Sage Scrub - Inland Form, 32520

DEV, Developed, 1200

DH, Disturbed Habitat, 11200

EUC, Eucalyptus, 11100

FP, Field / Pasture, 18310

MFS, Mule Fat Scrub, 63310

NNG, Non-Native Grassland, 42200

NVC, Non-Vegetated Channel, 13200

O-CLOW, Open Coast Live Oak Woodland, 71161

O-EOW, Open Engelmann Oak Woodland, 71181

SCLORF, Southern Coast Live Oak Riparian Forest, 61310

SMC, Granitic Southern Mixed Chaparral, 37121

SWS, Southern Willow Scrub, 63320

VNG, Valley Needlegrass Grassland, 42110

VP, Vernal Pool, 44322

Note: Lot 109 was relocated after public review of the EIR. For the new location, see Figure 1-5.

Source: HDR 2008

NORTH

0 200 400 800 Feet

Figure 3.1-1b
Biological Resources- Area A South of Highland Valley Road

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AREA C
AREA B
Vernal Pool E1
Vernal Pool E2
Vernal Pool E3
Vernal Pool E4
Vernal Pool NW1
Vernal Pool NW2
Vernal Pool NW3
Vernal Pool NW4
Vernal Pool NW5
Vernal Pool NW6
Vernal Pool NW7
Vernal Pool S1
Vernal Pool S2
Vernal Pool S3
Vernal Pool S4
Vernal Pool S5
Vernal Pool S6
Vernal Pool S7
Vernal Pool S8
Vernal Pool S9
Vernal Pool S10
Vernal Pool S11
Vernal Pool S12
Vernal Pool S13
Vernal Pool

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Table 3.1-1
Army Corps of Engineers Jurisdictional Waters and Wetlands

	Existing Acreage				
Vegetation Community	**Area A**	**Area B**	**Area C**	**ROW[1]**	**Total**
Mulefat Scrub	0.08	0.54	0.26	0.02	0.90
Cismontane Alkali Marsh	1.06	N/A	N/A	N/A	1.06
Nonvegetated Channel	0.24	2.05	0.03	0.01	2.33
Total Acreage	**1.38**	**2.59**	**0.29**	**0.03**	**4.29**

[1] ROW = right-of-way; Highland Valley Road and SR 67 ROW.

Table 3.1-2
California Department of Fish and Game Jurisdictional Waters and Wetlands

	Existing Acreage				
Vegetation Community	**Area A**	**Area B**	**Area C**	**ROW[1]**	**Total**
Southern Willow Scrub	0.14	0.55	4.46	0.02	5.17
Mulefat Scrub	0.08	0.54	2.97	0.02	3.61
Cismontane Alkali Marsh	15.05	14.01	11.59	0.15	40.80
Vernal Pools	0.18	0.63	1.80	0.00	2.61
Nonvegetated Channel	0.20	2.09	0.03	0.01	2.33
Nonnative Grassland	1.19	0.00	0.00	0.02	1.21
Total Acreage	**16.84**	**17.82**	**20.85**	**0.22**	**55.73**

[1] ROW = right-of-way; Highland Valley Road and SR 67 ROW.

Table 3.1-3
County Resource Protection Ordinance Jurisdictional Wetlands

	Existing Acreage				
Vegetation Community	**Area A**	**Area B**	**Area C**	**ROW**	**Total**
Southern Willow Scrub	0.14	0.55	4.46	0.02	5.17
Mulefat Scrub	0.08	0.54	2.97	0.02	3.61
Cismontane Alkali Marsh	15.05	14.01	11.59	0.15	40.80
Vernal Pools	0.18	0.63	1.80	0.00	2.61
Nonvegetated Channel	0.20	2.09	0.03	0.01	2.33
Nonnative Grassland	1.19	0.00	0.00	0.02	1.21
Field Pasture[1]	0.00	8.40	0.00	0.00	8.40
Total Acreage	**16.84**	**26.22**	**20.85**	**0.22**	**64.13**

[1] County RPO jurisdiction where drainage traverses field pasture in Area B.

Table 3.1-4
Potential Sensitive Species for the Cumming Ranch Site

Species	Sensitivity Status	Preferred Habitat	Occurrences
Crustaceans			
San Diego fairy shrimp *Branchinecta sandiegoensis*	Federally Endangered	Vernal pools	Identified within most of the vernal pools located within Area C.
Herpetofauna			
arroyo southwestern toad (*Bufo microscaphus californicus*)	Federally Endangered	Streambeds with flowing water, uplands habitats	Not observed within the Cumming Ranch project site, but marginal habitat is located onsite.
western spadefoot toad *Scaphiopus hammondii*	California Species of Concern County Sensitive	Vernal swales, vernal pools, and cismontane alkali wetlands	Large numbers of spadefoot toad were detected within the vernal pools, vernal swales, and ephemeral drainages of Areas A, B, and C: approximately five individuals in Area A, 32 in Area B, and 10 in Area C.
California orange-throated whiptail *Cnemidophorus hyperythrus*	California Species of Concern County Sensitive	Open scrub habitats – primarily coastal sage scrub	Three individuals detected within the sage scrub located along the central ridgeline of Area A.
coastal California whiptail *Cnemidophorus tigris mundus*	County Sensitive	Open shrublands within the cismontane regions of Southern California	Fairly common species within the shrubland habitats onsite; 13 individuals identified.
granite night lizard *Xantusia henshawi*	California Species of Concern County Sensitive	Exfoliating rock outcrops	Three individuals identified within large and small cracks among several rock outcrops in Areas A, B, and C.
granite spiny lizard *Sceloporus orcutti*	County Sensitive	Rock outcrops both cismontane and transmontane above 1,500 feet in elevation	Two individuals identified within the rock outcrops located along the northern boundary of Area A.
San Diego coast horned lizard *Phrynosoma coronatum*	California Species of Special Concern County Sensitive	Open shrublands at all elevations within Southern California	Two individuals identified along a dirt access road located near the central ridgeline in Area A north of Highland Valley Road.
two-striped garter snake *Thanmophis hammondii*	California Species of Special Concern County Sensitive	Ponds, streams, rivers, and most open freshwater habitats	Two individuals identified within Etcheverry Creek as it enters the Hardy Ranch property.
Birds			
Cooper's hawk *Accipiter cooperi*	California Species of Concern Migratory Bird Treaty Act County Sensitive	Woodlands and chaparral	Observed within the Cumming Ranch site and seen roosting within the adjacent eucalyptus grove of Hardy Ranch. Species may forage within the shrubland in Areas A and B.
golden eagle *Aquila chrysaetos*	California Species of Concern Migratory Bird Treaty Act County Sensitive	Woodlands and grasslands	Observed foraging over the site on several occasions and perched on several of the rock outcrop features located in Areas A, B, and C. Closest known nest located in the east-facing cliffs of Iron Mountain.

Species	Sensitivity Status	Preferred Habitat	Occurrences
bald eagle *Haliaeetus leucocephalus*	California Species of Concern Migratory Bird Treaty Act County Sensitive	Open water and grasslands	Observed by residents. A first-time nest is located in eucalyptus tree, 7,400 feet west of the project site in 2013.
bald eagle white-tailed kite *Elanus caeruleus*	California Species of Concern Migratory Bird Treaty Act County Sensitive	Woodlands and grasslands	Observed foraging over the site on several occasions in Areas A, B, and C. Not known to nest or roost at the Cumming Ranch site.
red-shouldered hawk *Buteo lineatus*	Migratory Bird Treaty Act County Sensitive	Woodlands	Observed foraging within the oak woodlands located south of Highland Valley Road and within the eucalyptus woodlands located just offsite.
ferruginous hawk *Buteo regalis*	California Species of Concern Migratory Bird Treaty Act County Sensitive	Grassland habitats preferred for foraging	Observed foraging over the site on several occasions in Areas A, B, and C.
northern harrier *Circus cyaneus*	County Sensitive	Grasslands, shrublands, agricultural fields	Observed foraging in Area C in winter and spring.
turkey vulture *Cathartes aura*	Migratory Bird Treaty Act County Sensitive	All habitat types	Observed foraging over the site on several occasions in Areas A, B, and C. Known to have communal roost on Mount Woodson. Not known to nest or roost on the Cumming Ranch site.
loggerhead shrike *Lanius ludovicianus*	Federal and California Species of Special Concern County Sensitive	Shrublands, agricultural areas, grasslands	One adult observed resting in open sage scrub in Area A before continuing flight southward.
Canada geese *Branta Canadensis*	Migratory Bird Treaty Act	Native and nonnative grasslands, open space area associated with ponds, lakes, and riparian areas	A small flock was observed foraging near the northeastern corner of Area B.
grasshopper sparrow *Ammodramus savannarum*	County Sensitive	Valley foothill grasslands and nonnative grasslands	Observed onsite in 2004 during Quino checkerspot butterfly surveys.
Bell's sage sparrow *Amphispiza belli* ssp. *belli*	California Species of Concern County Sensitive	Chaparral, sagebrush, and other open habitat with shrubs	Observed onsite in 2004 during Quino checkerspot butterfly surveys.
Mammals			
San Diego desert woodrat *Neotoma lepida intermedia*	California Species of Concern County Sensitive	Rock outcrops, cactus, and abandoned mines	At least eight nests were detected within the rock outcrops located within Areas A.
San Diego black-tailed jackrabbit *Lepus californicus bennettii*	California Species of Concern County Sensitive	Open grasslands and deserts	Several jackrabbits were flushed during surveys of the habitats located along the central ridgeline of Area A.

Species	Sensitivity Status	Preferred Habitat	Occurrences
southern mule deer *Odocoileus hemionus*	California Species of Concern County Sensitive	Known to occur in a variety of habitats, but prefers shrublands, woodlands, and other habitats that provide concealment, thermal cover, and foraging opportunities	Three individuals were observed traveling north along the central ridgeline of Area A north of Highland Valley Road.
American badger *Taxidea taxus*	California Species of Concern County Sensitive	Open grasslands and deserts	One adult and one sub-adult badger were observed sunning on a rock outcrop in Area B.
mountain lion *Felis concolor*	California Species of Concern County Sensitive	Known to occur in all habitats	Mountain lion sightings have been reported by adjacent land owners and visitors (trespassers) to the site, and scat was positively identified during one of the surveys of the site. Not expected to be resident within the site boundaries due to lack of prey base. However, it is expected that mountain lions and other large mammals may use the site as a movement corridor.
Plants			
southern tarplant *Centromedia parryi australis*	CNPS List 1B County Sensitive	Vernally mesic soils in valley foothill grasslands and in vernal swales or pools	Several populations identified within Areas A, B, and C. Approximately 33,200 plants in Area A, 63,000 plants in Area B, and 250 plants in Area C.
Engelmann oak/coast live oak *Quercus engelmannii/ Quercus agrifolia*	CNPS List 4 County Sensitive	Mixed oak woodlands, and shrublands and grasslands that occur as an understory	30 Engelmann oak individuals and 30 coast live oak individuals have been detected, numbered, and mapped within Area A.
San Diego navarretia *Navarretia fossalis*	CNPS List 1B County Sensitive	Within vernal pools	One occurrence in Area C within Vernal Pool E5.

California Native Plant Society (CNPS) List 1B = Rare or Endangered in California and Elsewhere
CNPS List 4 = Plants of Limited Distribution

Table 3.1-5
Impacts to Sensitive Vegetation Communities

Vegetation Community	Existing Acreage					Impacted Acreage							Mitigation Requirement		Available Open Space (acres)				Required Avoidance* (acres)	Impact Neutral** (acres)	Mitigation Available (acres)				Mitigation Habitat Remaining (acres)	
	Area A	Area B	Area C	ROW	Total	Area A	Area B	Area C	ROW	Sub-total	Offsite	Total	Ratio	Acreage	Area A	Area B	Area C	Total	Area A	Total	Available Area A	Available Area B	Available Area C	Total Available	Total	Area A
Open Engelmann Oak Woodland (OEOW)	1.81	0.00	0.00	0.00	1.81	0.20	0.00	0.00	0.00	0.20	0.00	0.20	3:1	0.60	1.61	0.00	0.00	1.61	0.00	0.00	1.61	0.00	0.00	1.61	1.01	1.01
Open Coast Live Oak Woodland (OCLOW)	1.07	0.00	0.00	0.00	1.07	0.06	0.00	0.00	0.00	0.06	0.00	0.06	3:1	0.18	1.01	0.00	0.00	1.01	0.00	1.01	0.00	0.00	0.00	0.00	-0.18	-0.18
Valley Needlegrass Grassland (VNG)	0.00	0.00	2.15	0.00	2.15	0.00	0.00	0.00	0.00	0.00	0.00	0.00	-	0.00	0.00	0.00	2.15	2.15	0.00	0.00	0.00	0.00	2.15	2.15	2.15	0.00
Southern Willow Scrub (SWS)	0.14	0.55	4.46	0.02	5.17	0.00	0.00	0.00	0.02	0.02	0.03	0.05	3:1	0.15	0.14	0.55	4.46	5.15	0.13	0.01	0.00	0.55	4.46	5.01	4.86	-0.15
Mule Fat Scrub (MFS)	0.08	0.54	2.97	0.02	3.61	0.00	0.03	0.00	0.02	0.05	0.00	0.05	3:1	0.15	0.08	0.51	2.97	3.56	0.08	0.00	0.00	0.51	2.97	3.48	3.33	-0.15
Cismontane Alkali Marsh (CAM)	15.05	14.01	11.59	0.15	40.80	0.35	0.48	0.00	0.15	0.98	0.04	1.02	3:1	3.06	14.70	13.53	11.59	39.82	12.79	1.91	0.00	13.53	11.59	25.12	22.06	-3.06
Vernal Pool (VP)	0.18	0.63	1.80	0.00	2.61	0.00	0.00	0.00	0.00	0.00	0.00	0.00	-	0.00	0.18	0.63	1.80	2.61	0.00	0.18	0.00	0.63	1.80	2.43	2.43	0.00
Non-Vegetated Channel (NVC)	0.20	2.09	0.03	0.01	2.33	0.00	0.00	0.00	0.01	0.01	0.02	0.03	3:1	0.09	0.20	2.09	*0.03*	2.32	0.17	0.02	0.01	2.09	0.03	2.13	2.04	-0.08
Diegan Coastal Sage Scrub (DCSS)	72.68	15.24	0.70	0.03	88.65	26.31	0.00	0.00	0.03	26.34	0.00	26.34	2:1	52.68	46.37	15.24	0.70	62.31	2.81	5.40	38.16	15.24	0.70	54.10	1.42	-14.52
Granitic Southern Mixed Chaparral (GSMC)	33.82	0.00	0.00	0.00	33.82	19.35	0.00	0.00	0.00	19.35	0.00	19.35	0.5:1	9.68	14.47	0.00	0.00	14.47	0.00	1.18	13.29	0.00	0.00	13.29	3.61	3.61
Granitic Chamise Chaparral (GCC)	8.31	0.00	0.00	0.00	8.31	4.05	0.00	0.00	0.00	4.05	0.00	4.05	0.5:1	2.03	4.26	0.00	0.00	4.26	0.00	0.00	4.26	0.00	0.00	4.26	2.24	2.24
Non-Native Grassland (NNG)	26.21	6.81	89.28	2.12	124.42	8.90	0.00	2.29	0.72	11.91	1.03	12.94	1:1	12.94	17.31	6.81	86.99	111.11	3.37	12.90	1.04	6.81	86.99	94.84	81.90	-11.90
Field/Pasture (F/P)	197.19	161.13	0.00	1.88	360.20	161.52	0.41	0.00	1.88	163.81	1.14	164.95	0.5:1***	82.68	35.67	160.72	0.00	196.39	5.55	14.61	15.51	160.72	0.00	176.23	93.55	-67.17
Eucalyptus Woodland (EW)	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.23	0.23	-	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
Disturbed Habitat (DH)	1.70	0.00	0.12	0.06	1.88	0.34	0.00	0.00	0.06	0.40	0.06	0.46	-	0.00	1.36	0.00	0.12	1.48	0.39	0.00	0.97	0.00	0.12	1.09	1.09	0.97
Developed (Dev)	0.27	0.00	0.00	5.50	5.77	0.23	0.00	0.00	5.50	5.73	1.06	6.79	-	0.00	0.04	0.00	0.00	0.04	0.02	0.01	0.01	0.00	0.00	0.01	0.01	0.01
Total Acreage	**358.71**	**201.00**	**113.10**	**9.79**	**682.60**	**221.31**	**0.92**	**2.29**	**8.39**	**232.91**	**3.61**	**236.52**	**-**	**164.23**	**137.40**	**200.08**	**110.81**	**448.29**	**25.31**	**37.23**	**74.86**	**200.08**	**110.81**	**385.75**	221.52	-89.37

* Required avoidance is all RPO habitats.
** Impact-neutral is Lots A, B, C, D, E, F, and H, and SR 67 ROW dedication.
*** Field/Pasture habitat in Area B is mitigated at a 1:1 ratio.
Due to rounding, numbers may not total.

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Table 3.1-6
Summary of Impacts and Mitigation – ACOE Jurisdictional Waters and Wetlands

	Existing Acreage					Impacted Acreage						Mitigation Requirement for Area A Wetland Creation or Restoration		Open Space Habitat Remaining (acres)			
Vegetation Community	**Area A**	**Area B**	**Area C**	**ROW**	**Total**	**Area A**	**Area B**	**Area C**	**ROW**	**Off-site**	**Total**	**Ratio**	**Acreage**	**Area A**	**Area B**	**Area C**	**Total**
Mulefat Scrub	0.08	0.54	0.26	0.02	0.90	0.00	0.03	0.00	0.02	0.00	0.05	3:1	0.15	0.08	0.51	0.26	0.85
Cismontane Alkali Marsh	1.06	N/A	N/A	N/A	1.06	0.02	0.00	0.00	0.00	0.03	0.05	3:1	0.15	1.04	0.00	0.00	1.04
Non-Vegetated Channel	0.24	2.05	0.03	0.01	2.33	0.00	0.00	0.00	0.01	0.02	0.03	3:1	0.09	0.24	2.05	0.03	2.32
Total Acreage	**1.38**	**2.59**	**0.29**	**0.03**	**4.29**	**0.02**	**0.03**	**0.00**	**0.03**	**0.05**	**0.13**	**---**	**0.39**	**1.36**	**2.56**	**0.29**	**4.21**

Table 3.1-7
Summary of Impacts and Mitigation – CDFG Jurisdictional Waters and Wetlands

Vegetation Community	Existing Acreage					Impacted Acreage						Mitigation Requirement for Area A Wetland Creation or Restoration		Open Space Habitat Remaining (acres)			
	Area A	Area B	Area C	ROW	Total	Area A	Area B	Area C	ROW	Off-site	Total	Ratio	Acreage	Area A	Area B	Area C	Total
Southern Willow Scrub	0.14	0.55	4.46	0.02	5.17	0.00	0.00	0.00	0.02	0.03	0.05	3:1	0.15	0.14	0.55	4.46	5.15
Mulefat Scrub	0.08	0.54	2.97	0.02	3.61	0.00	0.03	0.00	0.02	0.00	0.05	3:1	0.15	0.08	0.51	2.97	3.56
Cismontane Alkali Marsh	15.05	14.01	11.59	0.15	40.80	0.35	0.48	0.00	0.15	0.04	1.02	3:1	3.06	14.70	13.53	11.59	39.82
Vernal Pools	0.18	0.63	1.80	0.00	2.61	0.00	0.00	0.00	0.00	0.00	0.00	N/A	N/A	0.18	0.63	1.80	2.61
Non-Vegetated Channel	0.20	2.09	0.03	0.01	2.33	0.00	0.00	0.00	0.01	0.22	0.03	3:1	0.09	0.20	2.09	0.03	2.32
Nonnative Grassland	1.19	0.00	0.00	0.02	1.21	0.01	0.00	0.00	0.02	0.00	0.03	1:1	0.03	1.18	0.00	0.00	1.18
Total Acreage	**16.84**	**17.82**	**20.85**	**0.22**	**55.73**	**0.36**	**0.51**	**0.00**	**0.22**	**0.09**	**1.18**	**---**	**3.48**	**16.48**	**17.31**	**20.85**	**54.64**

Table 3.1-8
Summary of Impacts and Mitigation – County RPO Jurisdictional Wetlands

Vegetation Community	Existing Acreage					Impacted Acreage						Mitigation Requirement for Area A Wetland Creation or Restoration		Open Space Habitat Remaining (acres)			
	Area A	Area B	Area C	ROW	Total	Area A	Area B	Area C	ROW	Off-site	Total	Ratio	Acreage	Area A	Area B	Area C	Total
Southern Willow Scrub	0.14	0.55	4.46	0.02	5.17	0.00	0.00	0.00	0.02	0.03	0.05	3:1	0.15	0.14	0.55	4.46	5.15
Mulefat Scrub	0.08	0.54	2.97	0.02	3.61	0.00	0.03	0.00	0.02	0.00	0.05	3:1	0.15	0.08	0.51	2.97	3.56
Cismontane Alkali Marsh	15.05	14.01	11.59	0.15	40.80	0.35	0.48	0.00	0.15	0.04	1.02	3:1	3.06	14.70	13.53	11.59	39.82
Vernal Pools	0.18	0.63	1.80	0.00	2.61	0.00	0.00	0.00	0.00	0.00	0.00	N/A	N/A	0.18	0.63	1.80	2.61
Non-Vegetated Channel	0.20	2.09	0.03	0.01	2.33	0.00	0.00	0.00	0.01	0.02	0.03	3:1	0.09	0.20	2.09	0.03	2.32
Nonnative Grassland	1.19	0.00	0.00	0.02	1.21	0.01	0.00	0.00	0.02	0.00	0.03	1:1	0.03	1.18	0.00	0.00	1.18
Field Pasture[1]	0.00	8.40	0.00	0.00	8.40	0.00	0.00	0.00	0.00	0.00	0.00	N/A	N/A	0.00	8.40	0.00	8.40
Total Acreage	**16.84**	**26.22**	**20.85**	**0.22**	**64.13**	**0.36**	**0.51**	**0.00**	**0.22**	**0.09**	**1.18**	**---**	**3.48**	**16.48**	**25.71**	**20.85**	**63.04**

[1] County RPO jurisdiction where drainage traverses field pasture in Area B.

Table 3.1-9
Summary of Vegetation Community Mitigation

Vegetation Community	Required Mitigation (acres)	Area A Mitigation (acres)	Area B Mitigation (acres)	Area C Mitigation (acres)	Notes
Open Engelmann Oak Woodland (OEOW)	0.60	0.78	0.00	0.00	Fully mitigated within Area A with 0.18 acre of 1.01-acre balance used to mitigate OCLOW.
Open Coast Live Oak Woodland (OCLOW)	0.18	0.00	0.00	0.00	Fully mitigated within Area A by preservation of OEOW.
Diegan Coastal Sage Scrub (CSS)	52.68	38.16	14.52	0.00	Fully mitigated within Areas A and B with balance of 0.72 acre.
Granitic Southern Mixed Chaparral (GSMC)	9.68	9.68	0.00	0.0	Fully mitigated within Area A with balance of 3.61 acres.
Granitic Chamise Chaparral (GCC)	2.03	2.03	0.00	0.00	Fully mitigated within Area A with balance of 2.23 acres.
Nonnative Grassland (NNG)	12.94	1.04	0.04	38.41	Mitigation of 95.62 acres of NNG and FP by preservation of 16.55 acres of NNG/FP in Area A, 40.66 acres of NNG/FP in Area B, and 38.41 acres of NNG in Area C.
Field Pasture (FP)	82.68	15.51	40.66	0.00	
Total Acres	**160.78**	**67.19**	**55.18**	**38.41**	

3.2 Cultural Resources

A cultural resources survey (Gross 2003) and limited subsurface testing program (Gross 2004) were conducted to identify resources and evaluate site significance of cultural resources within the project area. These cultural reports are compiled in the Cultural Resource Evaluation (Gross 2010), which is included as Appendix E. This section summarizes the findings of these analyses. Analyses completed for the project site included background research at the South Coastal Information Center at San Diego State University and San Diego Museum of Man; a field survey of the project site, including offsite improvement areas (sewer easements, trails easements, and intersection improvements), to determine the presence of previously unknown resources located on the property; and evaluation of the significance of cultural resources that could be affected by the proposed project.

3.2.1 Existing Conditions

Categories of Cultural Resources

Cultural resources are nonrenewable. Cultural resources are districts, buildings, sites, structures, areas of traditional use, or objects with historical, architectural, archaeological, cultural, or scientific importance. Cultural resources can be divided into three categories: archaeological resources, architectural resources, and traditional cultural resources.

Archaeological Resources

Archaeological resources include prehistoric and historic locations or sites where human actions resulted in detectable changes to the area. This can include changes in the soil and the presence of physical cultural remains. Archaeological resources can have a surface component, a subsurface component, or both.

Historic archaeological resources are those dating to after European contact. These resources may include subsurface features such as wells, cisterns, or privies. Other historic archaeological remains include artifact concentrations, building foundations, or remnants of structures.

Architectural Resources

Architectural resources are elements of the environment constructed by humans. Included are standing buildings, dams, bridges, and other structures of historic, engineering, or artistic significance. Factors in determining a resource's significance are its integrity, design,

associations with important events or persons, and age. To receive protection under existing federal laws for cultural resources, most resources must be at least 50 years old or have exceptional importance. Cold-War-era military facilities may meet the exception criteria. For example, certain facilities associated with Cold War missile and torpedo programs have been designated as significant architectural resources.

Traditional Cultural Resources

Traditional cultural resources are resources associated with beliefs and cultural practices of a living culture, subculture, or community. These beliefs and practices must be rooted in the group's history and be important to maintaining the cultural identity of the group. Archaeological sites; locations of events; sacred places; and resource areas, including hunting or gathering areas, may be traditional cultural resources.

Cultural Background and History of the Project Area

The sequence of human occupation of Southern California begins in the Paleo-Indian period, dating from 11,500 to 8500 before present (B.P.), a time in which adaptations were formerly believed to be focused on the hunting of large game but are now recognized to represent more generalized hunting and gathering, with considerable emphasis on marine resources (Erlandson and Colten 1991; Jones 1991). The following period, the Archaic (8500–1300 B.P.), is traditionally seen as encompassing both a coastal and an inland focus, with the coastal Archaic represented by the shell middens of the La Jolla complex and the inland Archaic represented by the Pauma complex (Willey and Phillips 1958). The Late Prehistoric period (1300–200 B.P.) is marked by the appearance of small projectile points indicating the use of the bow and arrow, the common use of ceramics, and the replacement of inhumations with cremations (Christenson 1990; Moratto 1984).

Ethnographically, the project area was within the territory of a loosely integrated cultural group historically known as the Kumeyaay or the Northern Diegueño. The Kumeyaay followed a seasonal gathering cycle, with bands occupying two or more seasonal villages, with temporary campsites radiating away from these central places (Cline 1984). The village of *Pa'mu* has been identified approximately 2 miles northeast of the project area (Cooley and Barrie 2004).

By the late 1700s, the Spanish missionaries had reached out to the Kumeyaay in the area of *Pa'mu* and named the area Santa Maria Valley. The missionaries used the area for grazing sheep, horses, and mules (Pourade 1961, 1963).

In 1843, an English sailor, Edward Stokes, and his father-in-law, José Ortega, acquired a Mexican land grant for the Rancho Santa Maria, located in the Santa Maria Valley (Pourade 1976). In 1849, Lieutenant Cave Couts brought the first four-wheeled wagon into the valley. Gold was discovered in Julian in 1870. This led to the creation of a stage line that ran between San Diego and Julian, which passed through Ramona. In 1872, tourmaline was discovered in the area east and north of Ramona, creating a gem rush in the area. In 1883, Amos Verlaque built a store and post office next to the stage line. This area became known as Nuevo (New Town). By 1886, a relative of Amos Verlaque, Theophile Verlaque, acquired 2 acres next to Amos's store and built the first house in the area (LeMenager 1989). In 1884, Milton Santee bought 6,000 acres of Rancho Santa Maria to subdivide into smaller parcels, including Nuevo. Approximately 3,800 acres were incorporated as the Santa Maria Land and Water Company. The company renamed the town of Nuevo after the heroine in Helen Hunt Jackson's novel, *Ramona*. The town of Ramona continued to grow as a ranching area. By the 1920s it was home to some of the largest turkey ranches in the world, and was dubbed "The Turkey Capital of the World" (LeMenager 1989). Today, Ramona's ranching community is focused on horses.

Cultural Resources Inventory for the Cumming Ranch Site

Twenty-seven archaeological sites and one isolate artifact were identified within the project area. Two of the sites were previously recorded (CA-SDi-12,022 and CA-SDi-14,161) and the remaining 25 were identified during this project's survey. Twenty-six of the archaeological sites are milling sites, with several having associated artifacts and/or midden deposits, and one is a historic trash lens, found in the sidewall of an unnamed seasonal drainage (Table 3.2-1).

Applicable Regulations and Policies

Regulatory guidelines for cultural resources are detailed in the Cultural Resources Evaluation, included as Appendix E.

3.2.2 Guidelines for the Determination of Significance

The guidelines for the determination of significance are based on State CEQA Guidelines as well as other local and state resource protection criteria. The local and state regulations include the County RPO for archeological resources and the California Register of Historical Resources (CRHR). The project would have a significant adverse impact with regard to cultural resources if the project would do any of the following:

1. Directly, indirectly, or cumulatively damage or destroy a significant historic or archaeological resource. A significant resource is defined by CRHR as a resource that:

    a) is associated with events that have made a significant contribution to the broad patterns of California history and cultural heritage;

    b) is associated with the lives of persons important in our past;

    c) embodies the distinctive characteristic of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or

    d) has yielded, or may be likely to yield, information important in prehistory or history.

2. Cause a direct or cumulatively substantial adverse change to an archaeological resource as defined by the County RPO to include locations of "past intensive occupation" with "buried deposits" (RPO, Article II, 14).

3. Cause a direct or cumulatively substantial change in the significance of a historic resource that may have a significant effect on the environment (Public Resources Code Section 21000–21177). Substantial adverse change in the significance of a historical resource includes demolition, destruction, relocation, or alteration of the resource or its immediate surroundings to the extent that the significance of the resource is materially impaired.

3.2.3 Analysis of Project Effects and Determination of Significant Impact

Cultural Resource Sites and Potential Significance

The known cultural resources are located within areas subject to different levels of potential impacts. These have been identified as follows: (1) cultural resources located on house pads, roads, and/or trenching alignments; (2) cultural resources located within lots, but outside of house pads; (3) cultural resources located completely within protected open space easements; and (4) cultural resources located outside of the current planned development area. Cultural resources located on house pads and/or roads would be subject to construction grading and utilities trenching.

A cultural resources survey (Gross 2003) and a limited subsurface testing program (Gross 2004) were conducted to identify resources and evaluate site significance of cultural resources within the project area (Table 3.2-2). Two previously recorded sites, 25 additional sites, and one

isolated core were identified within the project area. Of these, 10 sites (CA-SDi-17,168; CA-SDi-17,170; CA-SDi-17,172; CA-SDi-17,173; CA-SDi-17,174; CA-SDi-17,175; CA-SDI-17,182; CA-SDi-17,183; CA-SDi-17,187; and CA-SDi-17,190) are located in areas that are proposed as open space within Areas A and B, and one site (CA-SDi-14,161) is located in Area C, which is not proposed for development. Six of these 11 sites were not included in the testing program, since no direct impacts would be expected. The remaining 16 sites were evaluated for significance under a limited testing program (Gross 2004). Subsequent project redesign placed some sites originally included in the testing program within open space.

Because of the cultural sensitivity throughout the project site, the potential to directly impact unknown cultural resources during ground-disturbing activities is a potentially ***significant impact*** per Guideline 1 (**Impact CR-1**).

CA-SDi-12,022

Site CA-SDi-12,022, a large milling complex, was originally recorded by the County in 1990 (Joyner et al. 1990). Highland Valley Road crosses the northern part of the site. A portion of CA-SDi-12,022 was evaluated by the County prior to construction of the current alignment of Highland Valley Road (Joyner et al. 1990). The County concluded that this portion of the site was not an important resource. Portions of the site were tested south of the road near Lots 14, 15, 16, and 23. The evaluated area has a very sparse subsurface artifact assemblage and is not a significant resource. The grading of pads for the lots on CA-SDi-12,022 would be ***less than significant*** per the Guidelines or the County RPO.

CA-SDi-14,161

This site was originally recorded in the mid-1990s as two milling features with associated artifacts (O'Neill 1994). Site CA-SDi-14,161 was not evaluated since it lies in Area C, outside of the proposed development area. Area C would be preserved as permanent open space. There would be no direct impacts to the resource, and impacts would be ***less than significant*** per the Guidelines or the County RPO.

CA-SDi-17,168

CA-SDi-17,168 was recorded in 2003 as two bedrock milling features with associated artifacts. This site was not evaluated, as it is located within the proposed permanent open space and would not be subject to direct impacts. Therefore, impacts would be ***less than significant*** per the Guidelines or the County RPO.

CA-SDi-17,169

CA-SDi-17,169 was recorded as two bedrock milling features with associated artifacts (Gross 2003). This site was evaluated due to its proximity to the proposed residential pad of Lot 99. The proximity of site CA-SDi-17,169 to the grading area for the residential pad of Lot 99 could result in indirect impacts to the cultural resource site. However, testing of the site indicated that the deposits were sparse and not of significance. Thus, potential impacts would be ***less than significant*** per the Guidelines or the County RPO.

CA-SDi-17,170

This site was recorded in 2003 as several bedrock milling features. This site was not included in the evaluation program because it is located within proposed open space and would not be subject to direct impacts. Thus, impacts would be ***less than significant*** per the Guidelines or the County RPO.

CA-SDi-17,171

CA-SDi-17,171 was recorded in 2003. This large, Late Prehistoric site was evaluated as one of the most important resources on the subject property (Gross 2004). It appears to be a major settlement or camp, and has deposits that contain information that can significantly contribute to understanding the past. Destruction of the site would constitute a significant impact under both CEQA and the County RPO. As mandated by the County RPO, CA-SDi-17,171 would be preserved in open space, with the exception of a small marginal edge that extends into the roadway. Testing indicated that this marginal area has sparse subsurface deposits relative to other areas of the site, and that the deposits most likely resulted from agricultural activities dragging artifacts out of the midden area. The direct impacts from roadway construction would be ***less than significant*** per the Guidelines or the County RPO. Although the significant portion of this site would be avoided and preserved, the proximity of construction activities to the site could result in ***potentially significant*** indirect impacts per Guideline 1 (**Impact CR-2)**.

CA-SDi-17,172

CA-SDi-17,172 was recorded in 2003 as bedrock milling features. This site was not evaluated for significance as it is located within proposed permanent open space and would not be subject to direct impacts. Thus, ***less-than-significant*** impacts would occur per the Guidelines or the County RPO.

CA-SDi-17,173

This small milling site was recorded in 2003. Testing indicated this is not a significant site, as the subsurface material is minimal (Gross 2004). This site is located within proposed permanent open space and would not be subject to direct impacts. Thus, ***less-than-significant*** impacts would occur per the Guidelines or the County RPO.

CA-SDi-17,174

CA-SDi-17,174 was recorded in 2003 as three bedrock milling features. This site was evaluated and is not significant (Gross 2004). This site is located within proposed permanent open space and would not be subject to direct impacts. Thus, ***less-than-significant*** impacts would occur per the Guidelines or the County RPO.

CA-SDi-17,175

This site was recorded in 2003 as four bedrock milling features. This site was evaluated and is not significant (Gross 2004). This site is located within proposed permanent open space and would not be subject to direct impacts. Thus, ***less-than-significant*** impacts would occur per the Guidelines or the County RPO.

CA-SDi-17,176

This site was recorded in 2003 as four bedrock milling features. This site was evaluated and is not significant (Gross 2004). CA-SDi-17,176 is located within Lots 87 and 88, but outside of the residential pad development areas. Indirect impacts could occur within the lots; however, these potential impacts are ***less than significant*** per the Guidelines or the County RPO.

CA-SDi-17,177

CA-SDi-17,177 is a long, narrow site composed of a number of bedrock milling stations on exposed boulders and bedrock outcrops. It was recorded in 2003. This large site is located in portions of Lots 85, 86, 89, 90, 91, 92, 93, 95, and 101, and would be bisected by two project roadways. Testing has demonstrated that significant archaeological deposits are lacking over most of the site (Gross 2004). Important deposits (significant under CEQA and the County RPO) are located in open space. The lot pads or roads do not cross areas of important deposits within the site. For these reasons, no significant deposits would be potentially affected, and impacts to

this site would be less than significant. However, the proximity of construction activity to the site could result in ***potentially significant*** indirect impacts per Guideline 1 (**Impact CR-3**).

CA-SDi-17,178

CA-SDi-17,178 was recorded in 2003 as several milling features with associated midden. Located in Lots 94, 95, 96, and 97, areas of CEQA-significant deposits for CA-SDi-17,178 are located outside of the residential pads on these lots. The driveway for Lot 86 would cross the site, but not in an area of important deposits. The areas where the pads or driveway are proposed do not contain significant deposits, based on the testing program (Gross 2004). Therefore, because impacted areas do not contain important deposits, construction of the pads and driveway would not constitute a significant impact per the Guidelines or the County RPO. Site CA-SDI-17,178 cannot be avoided and would be directly impacted by lot and road construction that could result in ***potentially significant*** direct CEQA impacts per Guideline 1 (**Impact CR-4**).

CA-SDi-17,179

This site was recorded in 2003 as two bedrock milling features. This site is located within Lot 116. This site was evaluated and is not a significant cultural resource (Gross 2004). Therefore, construction of the pad on Lot 116 would be a ***less-than-significant*** impact per the Guidelines or the County RPO.

CA-SDi-17,180

CA-SDi-17,180 was recorded in 2003 as six bedrock milling features. This site was evaluated and is not a significant cultural resource (Gross 2004). CA-SDi-17,180 is located partially within the residential pad on Lot 87. Because the site is not significant, construction of Lot 87 is a ***less-than-significant*** cultural resource impact per the Guidelines or the County RPO.

CA-SDi-17,181

This site was recorded in 2003 as a single bedrock milling feature. This site was evaluated and is not significant (Gross 2004). CA-SDi-17,181 is located outside of the residential pad on Lot 12 and would not be subject to direct impacts. Because the resource is not significant, impacts from construction on Lot 12 would be ***less than significant*** per the Guidelines or the County RPO.

CA-SDi-17,182

CA-SDi-17,182 was recorded in 2003 as two bedrock milling features with associated artifacts. This site was not evaluated for significance, as it is located within proposed permanent open space and would not be subject to direct impacts. Therefore, impacts would be ***less than significant*** per the Guidelines or the County RPO.

CA-SDi-17,183

This site was recorded in 2003 as several bedrock milling features. The site is partially located within proposed permanent open space, but would be subject to indirect impacts. This site was tested and impacts were determined to be ***less than significant*** per the Guidelines or the County RPO.

CA-SDi-17,184

CA-SDi-17,184 was originally recorded in 2003 as two bedrock milling features. This site extends into Lot 1 and would be affected by the grading of an internal roadway. However, subsurface testing indicates that this site does not constitute a significant resource (Gross 2004); therefore, impacts would be ***less than significant*** per the Guidelines or the County RPO.

CA-SDi-17,185

This site was recorded in 2003 as several bedrock milling features. CA-SDi-17,185 is located outside of the residential pad for Lots 78 and 79 and in proposed open space within Area A. The site would not be subject to direct impacts. Based on the evaluation program (Gross 2004), CA-SDi-17,185 does not constitute a significant resource. Therefore, ***less-than-significant*** impacts per the Guidelines or the County RPO would result from construction of the project.

CA-SDi-17,186

CA-SDi-17,186 was recorded in 2003 as a large milling complex consisting of several bedrock outcrops. The site would be located in open space; however, a peripheral portion of the site would extend into Lot 4 and would also be crossed by one of the project roadways. Evaluation of the site indicates that it is an important resource with a subsurface deposit. The site has a well-developed midden that contains groundstone, debitage, nonhuman bone, ceramics, and flaked tools. The portion of the site on Lot 4 and the areas crossed by the road are peripheral, and most likely created by past agricultural activities dragging artifacts out of the site core; therefore, grading in these areas would not be significant per the Guidelines. The impact would not be

significant per the County RPO. Although the significant portion of this site would be avoided and preserved, the proximity of construction activity to the site could result in ***potentially significant*** indirect impacts per Guideline 1 (**Impact CR-5**).

CA-SDi-17,187

This bedrock milling site was recorded in 2003. The site was evaluated and does not constitute a significant resource under CEQA (Gross 2004). This site is located within proposed permanent open space and would not be subject to direct impacts. Thus, impacts would be ***less than significant*** per the Guidelines or the County RPO.

CA-SDi-17,188

This site was recorded in 2003. Several bedrock milling features were reported. CA-SDi-17,188 is located on Lot 76 and partially extends into the residential pad area and an internal roadway alignment. CA-SDi-17,188 was evaluated and does not constitute a significant resource (Gross 2004). Therefore, ***less-than-significant*** impacts per the Guidelines or the County RPO would result from construction of the project.

CA-SDi-17,189

CA-SDi-17,189 was recorded in 2003 as several bedrock milling features. The site is located within Lot 99 but outside of the residential pad, and would not be subject to direct impacts. This site was evaluated and does not constitute a significant resource (Gross 2004). Therefore, impacts due to construction of Lot 99 would be ***less than significant*** per the Guidelines or the County RPO.

CA-SDi-17,190

This site was recorded in 2003 as several bedrock milling features. The site was evaluated and does not qualify as a significant resource (Gross 2004). This site is located within proposed permanent open space and would not be subject to direct impacts. Thus, ***less-than-significant*** impacts would occur per the Guidelines or the County RPO.

CA-SDi-17,191

CA-SDi-17,191 was recorded in 2003 as several bedrock milling features. The site is located outside of the residential pad on Lot 110 and would not be subject to direct impacts.

CA-SDi-17,191 was evaluated and does not constitute a significant resource (Gross 2004). Therefore, potential impacts to site CA-SDi-18,191 would be ***less than significant*** per the Guidelines or the County RPO.

CA-SDi-17,192

This site was recorded in 2003 as a 1930s to 1950s historic trash lens, observed in the sidewall of an unnamed seasonal drainage located on Lots 94 and 95 (Gross 2004). The site is located outside of the residential pads on Lots 94 and 95, and would not be subject to direct impacts. This site was evaluated and does not constitute a significant resource because it is a relatively shallow deposit and it lacks diagnostic items such as toiletries and clothing remains that would be expected from a significant household site. As a result, all of the information that can be obtained from the site has been thoroughly captured through the archival research, testing, and recordation of the site, and the impacts to the site would be ***less than significant*** per the Guidelines or the County RPO.

Isolate P-025842

One isolate was recorded in 2003. This consists of one metavolcanic, unidirectional core. Isolated items are not considered significant and, therefore, impacts would be ***less than significant*** per the Guidelines or the County RPO.

Summary of Cultural Resource Impact Analysis

There are 10 sites located entirely within proposed permanent open space: CA-SDi-14,161; CA-SDi-17,168; CA-SDi-17,170; CA-SDi-17,172; CA-SDi-17,173; CA-SDi-17,174; CA-SDi-17,175; CA-SDi-17,182; CA-SDi-17,187; and CA-SDi-17,190. Because these sites would not be located in areas proposed for construction, and there would be permanent resource management of the sites, impacts would be ***less than significant*** per Guideline 1, 2, or 3, and the County RPO.

There are numerous sites that would be located either within project lots, partially or entirely within the residential pad development areas, within alignments for internal roadways, or within utility line alignments that may be directly or indirectly affected by construction activities: CA-SDi-12,022; CA-SDi-17,169; CA-SDi-17,176; CA-SDi-17,179; CA-SDi-17,180; CA-SDi-17,181; CA-SDi-17,184; CA-SDi-17,185; CA-SDi-17,188; CA-SDi-17,189; CA-SDi-17,191; and CA-SDi-17,192. Of these, sites CA-SDi-12,022 and CA-SDi-17,183 have been tested previously and found not to be significant. The other 11 sites lack significant deposits and,

therefore, their destruction would not constitute significant impacts to cultural resources. Although the sites listed above could be potentially affected, both directly and indirectly, by project construction, these sites were evaluated and found to be not significant cultural resources. Therefore, potential impacts to these sites would be ***less than significant*** per Guidelines 1, 2, and 3, and the County RPO.

The overall cultural sensitivity of the project site indicates a potential to directly impact unknown cultural resources during ground-disturbing activities. This is a potentially ***significant impact*** per Guideline 1 (**Impact CR-1**).

Sites CA-SDi-17,171 and CA-SDi-17-177 have significant deposits per CEQA and the County RPO that would be preserved through project design. Significant direct impacts would not occur because the important portions of the sites would be avoided, but there would or may be direct impacts to non-significant portions of these sites. However, because of the proximity of these resources to the project's construction and residential uses, there would be ***significant indirect impacts*** (**Impact CR-2 and CR-3**).

One site, CA-SDi-17,178, cannot be avoided and would be directly impacted by project grading and development. The site has resources considered significant under CEQA that are located within portions of four lots (94, 95, 96, and 97) and a driveway alignment. Construction of the project would result in a ***significant impact*** to the entire site per Guideline 1 **(Impact CR-4).**

Site CA-SDi-17,186 has significant deposits per CEQA and the County RPO that would be preserved through project design. Significant direct impacts would not occur because the important portions of the site would be avoided, but there would or may be direct impacts to non-significant portions of the site. Because of the proximity of these resources to the project's construction and residential uses, there could be ***significant indirect impacts*** per Guidelines 1 and 2 (**Impact CR-5**).

3.2.4 Cumulative Impact Analysis

According to CEQA, the importance of cultural resources comes from the research value and the information that they contain. Therefore, the issue that must be explored in a cumulative analysis is the cumulative loss of that information. Typically, for sites considered less than significant, the information is preserved through recordation, test excavations, and preservation of artifacts. Significant sites that are placed in protected open space easements avoid direct impacts to these cultural resources and impacts related to preservation of their potential research data. Significant sites that are not placed within open space easements and are directly impacted would preserve

the information through recordation, test excavations, and data recovery programs that would be presented in reports and filed with the County and South Coast Information Center. The artifact collections from any potentially significant site would be curated at a federally approved curation facility such as the San Diego Archaeological Center and would be available to researchers for further study. Because cultural resources are non-renewable, it is critical that information obtained through excavation is appropriately retained and used.

The cultural resources cumulative study area was identified based on potential future research questions that could be developed within the context of subsistence and settlement models for the project area. In Ramona, major east/west drainages were travel corridors used by prehistoric occupants in their seasonal rounds. The confluences of drainages are often major habitation site locations, with associated temporary camps and resource procurement stations established on surrounding tributaries and adjacent uplands.

Projects included in this cultural resource cumulative analysis and their known impacts to cultural resources are detailed in Table 3.2-3. The cumulative project list compiled for cultural resource analysis includes 75 projects as a subset of the projects on the overall cumulative list for the Cumming Ranch project. Of these cumulative projects, 45 projects did not require a cultural resources study or had negative cultural resources survey reports. Five projects had resources that were found to be less than significant. An additional 12 projects are in the process of being analyzed, and the results of these cultural resource studies are not known at this time. The remaining 13 projects identified significant cultural resources and provided mitigation when necessary. The typical method of mitigation is preservation of the resources in open space easements, with some data recovery programs when preservation in open space easements is not feasible. As previously described, 27 archaeological sites and one isolated artifact were identified at the Cumming Ranch site. The majority of these identified sites would be located either in open space or outside of construction areas; thus, impacts to significant resources would generally be avoided. The proposed project's potentially significant impacts to cultural resources would be reduced below a level of significance by recordation, mapping, data recovery, and archaeological monitoring by a County-approved archaeologist and a monitor representing the local Native American tribes during both onsite and offsite grading activities, as outlined in Section 3.2.5.

Similarly, impacts to any undiscovered or buried potentially significant cultural resources located within the cumulative projects' boundaries would be reduced to below a level of significance by similar measures. Future development within the cumulative study area would be subject to similar analysis and mitigation requirements pursuant to CEQA and the County RPO. As noted above, the majority of projects with significant cultural resources provided mitigation requiring preservation of the resources within open space easements, similar to the proposed project. If not

feasible for preservation, the significant sites would be processed through a data recovery program to document and record the significant information provided by the resource. These forms of mitigation, including preservation in open space, allow cultural resources to be protected and preserved; data collection allows for the important information relative to the resource to be retained and documented. These preservation and data collection methods ensure that the critical information about the prehistoric occupants of the Ramona area gained through study of cultural resource sites and artifacts is not lost or destroyed by cumulative development within the area.

The proposed project and related projects within the cultural resources cumulative study area must comply with CEQA and the County RPO, which require adequate analysis and mitigation of cultural resources. Thus, archaeological impacts associated with the related cumulative projects are expected to be less than significant and/or fully mitigated, and the critical information regarding cultural history of the area would be preserved or documented. For these reasons, the proposed project would not result in a significant contribution to cumulative impacts for cultural resources, and impacts would be ***less than significant*** per Guidelines 1, 2, and 3.

3.2.5 Mitigation Measures

Mitigation Measure M-CR-1 All Ground-Disturbing Activities

a. A cultural resources monitoring program shall be implemented as summarized here and detailed in the Cultural Resources Report.

   The monitoring program shall include the observation of all grading by one or more Native American monitors and by an archaeological monitor or monitors (depending on the scale of grading going on at any one time). A preconstruction meeting to clarify procedures shall be held prior to the start of ground-disturbing activities.

b. If cultural resources are identified during ground-disturbing activities, the following procedures shall be implemented:

   1. Isolated artifacts and minor (non-significant) deposits shall be documented in the field, allowing grading to proceed.

   2. Any potentially significant deposits or artifact concentrations shall be evaluated and the County Archaeologist shall be notified. A Research Design and Data Recovery Plan shall then be developed for any significant deposits and implemented. Grading in the vicinity of the deposits shall cease until the Data Recovery Plan is implemented to the satisfaction of the County Archaeologist. Standard County Procedures shall be followed

in the case that human remains are inadvertently discovered. Material collected during the monitoring program shall be cataloged and analyzed and a report shall be prepared. This report shall address any data recovery that might be required during monitoring, as well as isolated artifacts found during the grading. Artifacts shall be curated at a qualified institution.

Mitigation Measure M-CR-2 Significant Cultural Resource Site CA-SDi-17,171

a. All ground-disturbing activities shall be monitored as described in Mitigation Measure M-CR-1.

b. Prior to the start of construction, temporary fencing shall be placed around the known significant portions of this site and shall remain in place until grading is complete to avoid inadvertent disturbance of the significant portion of the site.

c. A permanent fence shall be constructed between the road and the site. This shall be a rustic fence to blend with the nature of the proposed development and match fencing used in other areas of the development.

d. Signs shall identify this as a sensitive area that is being preserved, but they shall not mention cultural resources or archaeological sites.

e. Site CA-SDi-17,171 shall be placed in an open space easement granted to the County of San Diego.

f. The open space easement shall be managed in accordance with the RMP required for this project (the Conceptual Resource Management Plan is provided in Appendix C). Measures specific to management of cultural resources include:

    1. A qualified resource manager, approved by the Director of Planning and Land Use and/or the County of San Diego Department of Parks and Recreation, shall take responsibility for the management of the open space lots.

    2. At the time the resource manager assumes responsibility for the management of the lots, or just prior to this event, the condition of the sites in question shall be documented. This shall consist of establishment of permanent photography stations (either marked by permanent markers or by the designation of a recognizable and relocatable natural feature such as a rock). These shall be identified on a map of the site. A series of panoramic photographs shall be taken from each photography station to record the condition of the site. Any disturbance or other pertinent conditions shall be

photographed, as well, and noted on the site map. A copy of this baseline information shall be filed at the South Coastal Information Center.

3. Each year thereafter, a site visit shall be made by a qualified archaeologist and a Native American Monitor. They shall check the condition of the site against the baseline data recorded in step 2. They shall note any problems and differences between the conditions as they exist on the ground and the conditions described in the baseline documentation. Reports of these visits shall be filed at the South Coastal Information Center.

4. If damage is noted to the archaeological sites, the archaeologist and Native American Monitor shall develop recommendations for preventing further damage. Such measures might include increased patrols, selected capping of site areas, posting of signs, or the formation of a neighborhood watch to monitor the sites and to report vandals.

Mitigation Measure M-CR-3 Significant Cultural Resource Site CA-SDi-17,177

a. All ground-disturbing activities shall be monitored as described in Mitigation Measure M-CR-1.

b. Prior to the start of construction, temporary fencing shall be placed around the known significant portions of this site and shall remain in place until grading is complete to avoid inadvertent disturbance of the significant portion of the site.

c. A permanent fence and signage shall be constructed between the road and the site, as described in **Mitigation Measure M-CR-2**.

d. Site CA-SDi-17,177 shall be placed in an open space easement granted to the County of San Diego.

e. The open space easement shall be managed in accordance with the RMP required for this project and shall include the management requirements outlined in **Mitigation Measure M-CR-2**.

Mitigation Measure M-CR-4 Significant Cultural Resource Site CA-SDi-17,178

a. The mitigation of impacts to CA-SDi-17,178 shall be through data recovery (refer to Cultural Resource Evaluation). A research design has been prepared for this project and is included in the Cultural Report which outlines data recovery mitigation for the proposed destruction of a portion of the archaeological site CA-SDi-17,178. The research design,

subject to approval by the County shall include, but is not limited to the following performance standards:

1. All data recovery shall include a Native American monitor. The presence of a Native American monitor shall be required for the duration of the excavation portion of the project.

2. Phase 1 data recovery shall include mechanical trenching (optional) and a 5%-15% hand-excavated sample of the subsurface artifact concentrations for CA-SDi-17,178. During excavation, attention shall be given to the need for special studies such as pollen analysis, flotation samples, botanical analysis, and protein residue analysis. If so, appropriate samples shall be taken and processed. Attention shall be given to collecting, documenting, and processing material for radiocarbon dating and obsidian source and hydration analysis. Material recovered from these excavations shall be cataloged and analyzed using standard procedures. All artifacts collected in the data recovery or in any other phase of this project shall be curated at a facility acceptable to the County of San Diego.

3. At the completion of Phase 1, a letter report shall be submitted to the Director of the Department of Planning and Land Use. The letter report shall evaluate the issues of site integrity, data redundancy, spatial and temporal patterning, features, and other relevant topics to assess the adequacy of the initial (2.5% is typical) percent sample. Based on this assessment, the letter report shall recommend the need for and scope of a second phase of field investigations, not to exceed a total site hand excavated sample (5% is typical) of the subsurface artifact concentration.

4. Implement Phase 2 of fieldwork, as necessary.

5. Conduct artifact analysis, including lithics analysis, ceramics analysis, faunal analysis, floral analysis, assemblage analysis, and radiocarbon dating, as detailed in Appendix 6 of the archaeological extended study, Cultural Resources Evaluation of Cumming Ranch (Gross 2004, 2010).

b. Prior to recordation of the Final Map the applicant shall:

1. Complete and submit the Final Technical Report from the principal investigator to the satisfaction of the Director of Planning and Land Use.

2. Provide evidence to the satisfaction of the Director of Planning and Land Use that all archaeological materials recovered during both the significance testing and data recovery phases have been curated at a San Diego facility that meets standards per 36 CFR 79, and, therefore, would be professionally curated and made available to other

archaeologists/researchers for further study. The collections and associated records shall be transferred, including title, to an appropriate curation facility within San Diego County, to be accompanied by payment of fees necessary for permanent curation. Evidence shall be in the form of a letter from the curation facility identifying that archaeological materials have been received and that all fees have been paid.

Mitigation Measure M-CR-5 Significant Cultural Resource Site CA-SDi-17,186

a. All ground-disturbing activities shall be monitored as described in **Mitigation Measure M-CR-1**.

b. Prior to the start of construction, temporary fencing shall be placed around the known significant portions of this site and shall remain in place until grading is complete to avoid inadvertent disturbance of the significant portion of the site.

c. A permanent fence and signage shall be constructed between the road and the site, as described in **Mitigation Measure M-CR-2**.

d. Site CA-SDi-17,186 shall be placed in an open space easement granted to the County of San Diego. The open space easement shall be managed in accordance with the RMP required for this project, and shall include the management requirements outlined in **Mitigation Measure M-CR-2**.

3.2.6 Conclusions

The majority of cultural resources that are in areas that would be affected by development would be located in open space to preserve the resource. However, because of the cultural sensitivity of the project site, there is a potential to impact cultural resources during ground-disturbing activities. This potential impact (**Impact CR-1**) is mitigated through a monitoring plan requiring monitoring during all ground-disturbing activities. Three sites (CA-SDi-17,171, CA-SDi-17,177, and CA-SDi-17,186) have significant deposits per CEQA and the County RPO that are required to be preserved through project design, but the proximity of project activities to these cultural resources could result in indirect impacts. Through temporary fencing during construction to protect sensitive areas, monitoring during all ground-disturbing activities, permanent fencing of sensitive areas, and placement of each site in an open space easement with long-term management directed by the RMP, long-term impacts would be avoided, and, therefore, impacts (**Impacts CR-2, -3, and -5**) would be reduced to ***less than significant***. Direct impacts (**Impact CR-4**) to CA-SDi-17-178, which contains significant resources per CEQA, would be mitigated through data recovery such that all the important information contained within would be

extracted, researched, and made available for future scholarly use, and the impacts would be reduced to ***less than significant***.

With implementation of these mitigation measures, there would be no conflict with Guidelines 1, 2, or 3, and potential impacts to sensitive resources would be reduced to ***less than significant***.

Table 3.2-1
Cultural Resources Identified within the Project Area

Site	Area	Description
CA-SDi-12,022	A	Bedrock milling features with localized midden and surface artifacts (flaked and ground tools and shards). A portion previously tested by the County (Joyner 1991).
CA-SDi-14,161	C	Two bedrock milling features with associated artifacts.
CA-SDi-17,168	A	Two bedrock milling features with associated artifacts.
CA-SDi-17,169	A	Boulders and bedrock outcrops with milling features.
CA-SDi-17,170	A	Numerous boulders and bedrock outcrops with milling features.
CA-SDi-17,171	A	Numerous boulders and bedrock outcrops with many slicks and shallow milling basins scattered on them; more than 450 milling elements.
CA-SDi-17,172	B	A large granitic outcrop with milling.
CA-SDi-17,173	B	Two bedrock outcrops with milling slicks.
CA-SDi-17,174	B	A bedrock outcrop with at least three slicks.
CA-SDi-17,175	B	Two granitic bedrock outcrops with milling slicks.
CA-SDi-17,176	A	Bedrock outcrop with milling.
CA-SDi-17,177	A	A long, linear group of boulders and bedrock outcrops with milling.
CA-SDi-17,178	A	An outcrop of granitic bedrock with milling.
CA-SDi-17,179	A	An outcrop of granitic bedrock with milling.
CA-SDi-17,180	A	An outcrop of granitic bedrock with milling.
CA-SDi-17,181	A	An outcrop of granitic bedrock with milling.
CA-SDi-17,182	A	Two small boulders in an intermittent drainage.
CA-SDi-17,183	A	A large, irregular outcrop of granitic bedrock with milling.
CA-SDi-17,184	A	An outcrop of granitic bedrock with milling.
CA-SDi-17,185	A	A small cluster of granitic boulders with milling.
CA-SDi-17,186	A	A cluster of granitic boulders with milling slicks.
CA-SDi-17,187	A	An outcrop of granitic bedrock with milling.
CA-SDi-17,188	A	Two bedrock outcrops with milling.
CA-SDi-17,189	A	An outcrop of granitic bedrock with milling.
CA-SDi-17,190	B	An outcrop of granitic bedrock with milling.
CA-SDi-17,191	A	An outcrop of granitic bedrock with milling.
CA-SDi-17,192	A	Small 1930s to 1950s historic trash lens.
Isolate P-025842	A	One metavolcanic core.

Table 3.2-2
Summary of Potential Impacts to Identified Cultural Resource Sites

Site	Location	Tested	CRHR Eligibility	Potential Impacts	Impact Assessment
CA-SDi-12,022	House pads for Lots 7, 8, 9, 14, 15, 16, and 23, and open space	Yes	Not Eligible	Direct (pad grading)	Not Significant per CEQA or RPO
CA-SDi-14,161	Within permanent open space	No	Not Evaluated	None	Not Applicable
CA-SDi-17,168	Within permanent open space	No	Not Evaluated	None	Not Applicable
CA-SDi-17,169	Lot 99, outside pad	Yes	Not Eligible	Indirect	Not Significant per CEQA or RPO
CA-SDi-17,170	Within permanent open space	No	Not Evaluated	None	Not Applicable
CA-SDi-17,171	Roadway alignment	Yes	Eligible	Direct (roadway grading); indirect	Significant per RPO and CEQA
CA-SDi-17,172	Within permanent open space	No	Not Evaluated	None	Not Applicable
CA-SDi-17,173	Within permanent open space	Yes	Not Eligible	None	Not Significant per CEQA or RPO
CA-SDi-17,174	Within permanent open space	Yes	Not Eligible	None	Not Applicable
CA-SDi-17,175	Within permanent open space	Yes	Not Eligible	None	Not Significant per CEQA or RPO
CA-SDi-17,176	Lots 87 and 88, outside pad	Yes	Not Eligible	Indirect	Not Significant per CEQA or RPO
CA-SDi-17,177	Lots 85, 86, 89, 90, 91, 92, 93, 95, and 101; two internal roadways; and permanent open space. Most of the important part of the site is in proposed open space.	Yes	Eligible	Direct (pad and roadway grading)/ construction; indirect	Significant per RPO for the portions in open space and per CEQA
CA-SDi-17,178	House pads for Lots 94, 95, 96, and 97; driveway of Lot 86	Yes	Eligible	Direct (pad grading); indirect	Significant per CEQA
CA-SDi-17,179	Lot 116, outside pad	Yes	Not Eligible	Indirect	Not Significant per CEQA or RPO
CA-SDi-17,180	Lot 87, edge of pad	Yes	Not Eligible	Indirect	Not Significant per CEQA or RPO
CA-SDi-17,181	Lot 12, outside pad, internal roadway	Yes	Not Eligible	Indirect	Not Significant per CEQA or RPO
CA-SDi-17,182	Within permanent open space	No	Not Evaluated	None	Not Applicable
CA-SDi-17,183	Within permanent open space and Lot 109	Yes	Not Eligible	Indirect	Not Significant per CEQA or RPO
CA-SDi-17,184	Lot 1 and internal roadway	Yes	Not Eligible	Direct (road grading)	Not Significant per CEQA or RPO
CA-SDi-17,185	Lots 78 and 79, outside pad; partially in permanent open space	Yes	Not Eligible	Indirect	Not Significant per CEQA or RPO

Site	Location	Tested	CRHR Eligibility	Potential Impacts	Impact Assessment
CA-SDi-17,186	Outside pad of Lot 4, and one internal road	Yes	Eligible	Direct (pad and road grading)	Significant per RPO for the portions in open space and per CEQA
CA-SDi-17,187	Within permanent open space	Yes	Not Eligible	None	Not Applicable
CA-SDi-17,188	Lot 76, edge of pad; one internal road	Yes	Not Eligible	Indirect	Not Significant per CEQA or RPO
CA-SDi-17,189	Lot 99, outside pad and within permanent open space	Yes	Not Eligible	Indirect	Not Significant per CEQA or RPO
CA-SDi-17,190	Within permanent open space	Yes	Not Eligible	None	Not Significant per CEQA or RPO
CA-SDi-17,191	Lot 110, outside pad; within permanent open space	Yes	Not Eligible	Indirect	Not Significant per CEQA or RPO
CA-SDi-17,192	Lots 94 and 95, outside pads	Yes	Not Eligible	Indirect	Not Significant per CEQA or RPO
Isolate P-025842	N/A	Yes	Not Eligible	None	Not Significant per CEQA or RPO

Table 3.2-3
Cumulative Project List for Cultural Resources

Number	Project Name	Permit Type	Permit #	# of Lots	Cultural Resources - Arch Sites	Historic/ Prehistoric	Site Type	Significance	Mitigation	Pre-existing Conditions
1	Salvation Army Camp	Major Use Permit	70-379W2	n/a	CA-SDI-15113, CA-SDI-15115, CA-SDI-15116, CA-SDI-114	Prehistoric Prehistoric	Bedrock milling features lithic scatter w/ debitage	Not significant Significant	Open space easement	
2	A Touch From Above	Major Use Permit	84-004W1	n/a	No cultural resources			Not significant	None	MUP 84-004 Milling feature, isolated mano, and flake. Not significant findings.
3	Rancho San Vicente	Major Use Permit	92-006W1	n/a	No cultural resources					
4	Ramona Disposal Service	Major Use Permit	96-017W3	n/a	No cultural resources report required					
5	Rancho Canada	Major Use Permit	02-005	n/a	No prehistoric or historical cultural resources found					
6	Mountain Valley Ranch	Major Use Permit	03-035	n/a	No cultural resources report required					
7	Lutheran Church Major Use Permit	Major Use Permit	08-017	n/a	CA-SDI-17299	Prehistoric	Campsite with groundstone and lithics, projectile point		None currently proposed	Site proposed to be destroyed
8	Ramona Air Center, GPA, PAA, TM, MUP	Major Use Permit	08-032	n/a	CA-SDI-11472, RAC-1, and RAC-2; structures over 50 years old	Prehistoric and historic	SDI-11472: bedrock milling, no surface artifacts. RAC-1: large milling station, three loci; extensive surface artifacts; midden soil. RAC-2: small milling feature; two surface artifacts. Two structures over 50 years old.	SDI-11472 and RAC-2: significant; RAC-1: undergoing testing for significance; historic buildings - not significant	Open space for SDI-11472 and RAC-2; not determined for RAC-1	

Number	Project Name	Permit Type	Permit #	# of Lots	Cultural Resources - Arch Sites	Historic/ Prehistoric	Site Type	Significance	Mitigation	Pre-existing Conditions
9	Souza Site Plan	Site Plan	02-064	n/a	No cultural resources report required					
10	Big Apple Bagels	Site Plan	03-044	n/a	No cultural resources report required					
11	Ramona Longs Drugs	Site Plan	06-024	n/a	No cultural resources report					
12	Ramona Hangers, STP	Site Plan	07-051	n/a	Negative survey-no cultural resources					
13	Brewer Land Co, Crane Maintenance Site	Site Plan	08-009	n/a	No cultural report					
14	Black Canyon	Tentative Map	4844	30	No cultural resources					
15	M.D.S. Dev. Corp./DECA	Tentative Map	4962	30	No cultural resources			Not significant		
16	Fenton Ranch	Tentative Map	4979	9	CA-SDI-11925, CA-SDI-11926, CA-SDI-11927, CA-SDI-928, CA-SDI-12142, CA-SDI-12143H, CA-SDI-12144H	Prehistoric and historic	Milling features, projectile points, debitage, ceramics and animal bone; historic buildings	Significant sites: CA-SDI-12142, 12143H, 12144H	Open space easements for the three significant sites, data recovery for the unsignificant sites.	
17	Welsh TM	Tentative Map	5136	12	No report requested, less-than-significant impact					
18	Brisson	Tentative Map	5188	11	No significant archaeological sites					
19	Teyssier TM	Tentative Map	5194	37	HAD-S-1, HAD-S-2, HAD-S-3, HAD-S-4, HAD-S-5, HAD-S-6, HAD-S-7, HAD-S-8, HAD-S-9, HAD-S-10, HAD-S-11	Prehistoric	Milling features, grinding slicks	Significance to be determined. Testing in progress.		

Number	Project Name	Permit Type	Permit #	# of Lots	Cultural Resources - Arch Sites	Historic/ Prehistoric	Site Type	Significance	Mitigation	Pre-existing Conditions
20	A Natural High INC	Tentative Map	5198	27	CA-SDI-5374 CA-SDI-5375	Prehistoric Prehistoric	Milling features, grinding slicks, manos, and flakes	Significant Not significant	Open space easements	
21	Monte Vista Ranch	Tentative Map	5235	134	Cultural report in progress					
22	Stonecrest Development	Tentative Map	5244	14	CA-SDI-16125, CA-SDI-16129, CA-SDI-16126, CA-SDI-16127, CA-SDI-16128	Prehistoric	Milling features, flakes, ground stone tools	Data recovery		
23	Montecito Ranch	Tentative Map	5250	360	CA-SDI-129901, CA-SDI-12472, CA-SDI-12473, CA-SDI-12474, CA-SDI-12475, CA-SDI-12476, CA-SDI-12477, CA-SDI-12478, CA-SDI-12479, CA-SDI-12479, CA-SDI-12480, CA-SDI-12481, CA-SDI-12482, CA-SDI-12483, CA-SDI-12484, CA-SDI-12485, CA-SDI-12486, CA-SDI-12487, CA-SDI-12488, CA-SDI-12489, CA-SDI-12490, CA-SDI-12491, CA-SDI-12492, CA-SDI-12493, CA-SDI-12494, CA-SDI-12495, CA-SDI-12496, CA-SDI-12497, CA-SDI-12498, CA-SDI-12499, CA-SDI-12500, CA-SDI-12501, CA-SDI-12502, CA-SDI-12503, CA-SDI-12504,	Prehistoric and historic	Four habitation sites, nine temporary camps, 16 milling stations, five lithic scatters, and two quarries	21 sites not significant, 15 sites significant	Open space easements	

Number	Project Name	Permit Type	Permit #	# of Lots	Cultural Resources - Arch Sites	Historic/ Prehistoric	Site Type	Significance	Mitigation	Pre-existing Conditions
					CA-SDI-12505, CA-SDI-12506					
24	Oak Country Estates	Tentative Map	5253	57	CA-SDI-7317, CA-SDI-7318, CA-SDI-7319, CA-SDI-7320, CA-SDI-7321, CA-SDI-7322, CA-SDI-7324, CA-SDI-7324, CA-SDI-7326, CA-SDI-7751, CA-SDI-7752, CA-SDI-7753, CA-SDI-7754, CA-SDI-7755, CA-SDI-7756, CA-SDI-7757, CA-SDI-7758, CA-SDI-7759, CA-SDI-7760, CA-SDI-7764, CA-SDI-7767, CA-SDI-7768, CA-SDI-15979, CA-SDI-15980, CA-SDI-15981, CA-SDI-15982, CA-SDI-16076, CA-SDI-16077, CA-SDI-16078, CA-SDI-16079, CA-SDI-16080, CA-SDI-16081	Prehistoric	Bedrock features including 1,317 slicks, 243 basins, 58 mortars, 172 flaked stone tools and cores with 9,115 pcs of debitage, 255 groundstone tools, 16 pcs of modified bone, 256 pcs prehistoric ceramic artifacts, 14,846 pcs of faunal bone, and 18 pcs of shellfish shell	20 sites not significant, 12 significant	Open space easements, monitoring, curation	
25	Rainbird Road	Tentative Map	5254	66	DR-1	Prehistoric	Milling features, lithic debitage, ceramics, and projectile points		To be determined; open space easement recommended	
26	Sunset Vista	Tentative Map	5257	7	No archaeology report requested					
27	Roberts TM	Tentative Map	5267	1	Negative survey					
28	Spitsbergen Subdivision	Tentative Map	5294	21	CA-SDI-5492, CA-SDI-13088, CA-SDI-16471,	Prehistoric	Prehistoric campsite, milling features, lithic,	Significance to be determined; testing in progress		

Number	Project Name	Permit Type	Permit #	# of Lots	Cultural Resources - Arch Sites	Historic/ Prehistoric	Site Type	Significance	Mitigation	Pre-existing Conditions
					CA-SDI-16472		ceramic, and faunal remains			
29	Elliot TM	Tentative Map	5302	62	In process	Historic	Five potentially historic structures	Testing in progress		
30	Lakeside Ventures TM	Tentative Map	5307	8	In process					
31	Meadow Builders	Tentative Map	5311	12	One historic house			Not significant		
32	Mt. Woodson	Tentative Map	5329	21	Arch. survey requested					
33	Cumming Ranch	Tentative Map	5344	125	In process; 25 sites	Prehistoric		To be determined by testing	Sites in open space easement will not be tested	
34	Nickel Creek	Tentative Map	5347	45	Negative survey					
35	Estates At McDonald Park TM	Tentative Map	5378	11	Negative survey; no cultural resources					
36	Paseo Village Townhomes	Tentative Map	5509	31	No cultural resources report					
37	LB Village Investments TM	Tentative Map	5535	14	No cultural resources report					
38	"F" Street Subdivision/TM	Tentative Map	5537	10	No cultural resources report					
39	Koury TPM	Tentative Parcel Map	19982	4	CA-SDI-13175, CA-SDI-13176H, CA-SDI-13177, CA-SDI-13178	Prehistoric and historic	Milling features, projectile points, debitage, ceramics and animal bone. Historic buildings	Open space easements for prehistoric features		
40	Fenton Ranch Gardening	Tentative Parcel Map	20299		CA-SDI-11925, CA-SDI-926, CA-SDI-927, CA-SDI-928, CA-SDI-12142H, CA-SDI-12144H	Prehistoric and historic	`	Significant	Open space easements	
41	Brinkler TPM	Tentative Parcel Map	20318	2	CA-SDI-12590		Ceremonial -Yoni	Significant	Open space easement	
42	Bagley & Quisenberry	Tentative Parcel Map	20498	5	CA-SDI- 12221	Prehistoric	Isolates of lithic flakes	Not significant	Data recovery	
43	McCandles TPM	Tentative Parcel Map	20564	4	No cultural resources report					
44	Humphus TPM	Tentative Parcel Map	20656	4	No cultural resources report requested					

Number	Project Name	Permit Type	Permit #	# of Lots	Cultural Resources - Arch Sites	Historic/ Prehistoric	Site Type	Significance	Mitigation	Pre-existing Conditions
45	Herold	Tentative Parcel Map	20679	4	Negative survey					
46	Means/3 lots ag20	Tentative Parcel Map	20692	3	In process					
47	Herold- Ashley Road	Tentative Parcel Map	20703	4	No cultural resource report requested					
48	KVAAS TPM	Tentative Parcel Map	20747	5	In process - Arch report requested					
49	Saffian TPM	Tentative Parcel Map	20749	4	Negative survey					
50	Ledesma Lane	Tentative Parcel Map	20760	4	In process					
51	Wakeman TMP	Tentative Parcel Map	20766	2	No sites, two isolates	Prehistoric	Bedrock slick and flake	Not significant		
52	Thompson	Tentative Parcel Map	20769	2	Cultural resource report not requested					
53	Taylor TPM	Tentative Parcel Map	20770	5	In process					
54	Sorric	Tentative Parcel Map	20771	5	No cultural resource report requested					
55	McDonald	Tentative Parcel Map	20792	5	Negative survey					
56	Herman TPM	Tentative Parcel Map	20801	4	Negative survey					
57	Young TPM	Tentative Parcel Map	20808	5	No cultural resource report requested					
58	Bates Parcel Map	Tentative Parcel Map	20809	5	No cultural resource report requested					
59	12th St TPM	Tentative Parcel Map	20909	2	No cultural resource report					
60	Parker Ln TPM	Tentative Parcel Map	20910	2	No cultural resource report					
61	Herold TPM 3 Lots	Tentative Parcel Map	20919	3	No cultural resource report					
62	H. Street Ramona	Tentative Parcel Map	20922	4	No cultural resource report					
63	Filippini Parcel Map	Tentative Parcel Map	20926	2	Negative survey- no cultural resources					

Number	Project Name	Permit Type	Permit #	# of Lots	Cultural Resources - Arch Sites	Historic/ Prehistoric	Site Type	Significance	Mitigation	Pre-existing Conditions
64	Neuman, TPM 4 Lots	Tentative Parcel Map	20962	4	CA-SDI-18321, CA-SDI-18322	Prehistoric		Significant	Open space	
65	Keyes Rd TPM	Tentative Parcel Map	20977	4	No cultural resource report					
66	Walnut Street, TPM 4 Lots	Tentative Parcel Map	20990	4	Negative survey-no cultural resources					
67	Kruse, TPM 2 Lots	Tentative Parcel Map	21031	2	Negative Survey-no cultural resources					
68	Agha, TPM 2 Lots	Tentative Parcel Map	21043	2	No cultural resource report					
69	Highland Valley, TPM 3 Lots +	Tentative Parcel Map	21051	3	Negative survey-no cultural resources					
70	Faaborg, GPA, REZ, TPM 2 Lots	Tentative Parcel Map	21056	2	Negative survey-no cultural resources					
71	Dekoven Project, TPM 4 Lots	Tentative Parcel Map	21070	4	CA-SDI-8819	Prehistoric	Multi-loci site	Locus 5 significant	Locus 5 open space	
72	PFAU/TPM/4 Lots Plus Remainder	Tentative Parcel Map	21071	4	No cultural resource report					
73	Zeigler/TPM/2 Lots	Tentative Parcel Map	21082	2	No cultural resource report					
74	Wood TPM	Tentative Parcel Map	21083		No cultural resource report					
75	Bain, TPM, 3 Lots	Tentative Parcel Map	21109	3	In-process (needs to be surveyed)					

Source: County DPLU 2009

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3.3 Noise

The analysis contained in this section summarizes the noise study completed for the Cumming Ranch project (EDAW 2008a), which is included as Appendix F. This section contains a summary of the potential noise impacts due to construction of the project, the compatibility of the proposed land uses with the existing and future noise environment of the project site, and the direct and indirect noise generated by operation of the project. A definition of the terms and noise analysis methodologies are provided in Appendix F.

3.3.1 Existing Conditions

Existing Noise Conditions

Access to the project site is provided by SR 67, Highland Valley Road, and Dye Road. Existing daily traffic volume data and peak-hour turning volumes for the surrounding roadways and intersections were obtained from the project traffic report prepared by RCE Transportation Engineers (Appendix A).

Noise levels were measured within the project site and in the surrounding community as shown in Figures 3.3-1a and 3.3-1b. Short-term noise measurements were taken within the project site and along SR 67. In addition to the short-term measurements, a long-term nighttime measurement was taken. The purpose of the nighttime measurement was to determine the lowest ambient noise level along the northern property line of Area A, which, based on nighttime measurements, is approximately 34 dBA (A-weighted decibels) L_{eq} (equivalent noise level). The measurement results are presented in Table 3.3-1.

As shown in Table 3.3-1, at measurement sites 2 and 4 along the southern border of the project site, the average measured noise level ranged from 46 to 49 dBA L_{eq}, with vehicle traffic as the principal source of noise. Through the middle of the project site, at measurement site 5 along Highland Valley Road, measured noise levels averaged 55 dBA L_{eq} approximately 100 feet from the centerline of the roadway. The long-term noise measurement, measurement site 6 along the northern boundary of the project site, indicates that evening noise levels average 46 dBA L_{eq}.

SOUND2000, Caltrans' version of the Federal Highway Administration (FHWA) Highway Traffic Noise Prediction Model (FHWA-RD-77-108) (Caltrans 2004), was used to predict existing peak-hour traffic noise levels at specific onsite receptor locations. Based on the information in Table 3.3-2, the existing noise levels within 50 feet of the centerline of Highland Valley Road currently exceed the Ramona Community Plan noise level (and General Plan Noise

Element) standard of 60 dBA Community Noise Equivalent Level (CNEL). At no other locations within the project site does the existing noise level exceed 60 dBA CNEL. Noise receptor locations are shown in Figures 3.3-2a and 3.3-2b.

According to the project's Biological Technical Report, habitat for noise-sensitive avian species that occurs onsite includes habitats that are associated with the coastal California gnatcatcher and raptors (HDR 2010). While the entire project site is suitable foraging habitat, the primary nesting habitat for these species onsite is CSS, chaparral, and oak woodland. Area A contains approximately 73 acres of CSS, approximately 3 acres of oak woodland, and approximately 42 acres of chaparral (HDR 2010).

Applicable Regulations and Policies

County of San Diego General Plan

The Noise Element of the County's General Plan sets a standard for exterior noise levels at noise-sensitive land uses (NSLUs) of 60 dBA CNEL for single-family residences. According to the County Noise Element, when a new development may result in any (existing or future) NSLU being exposed to noise levels of 60 dBA CNEL or greater, an acoustical analysis is required. An NSLU is defined as, "any residence, hospital, school, library, or similar facility where quiet is an important attribute of the environment." If the acoustical analysis shows that noise levels at any NSLU would exceed 60 dBA CNEL, modifications to the development are required to reduce the "exterior noise" level to 60 dBA CNEL or less and reduce the interior noise level to 45 dBA CNEL or less. If modifications to a development that would reduce the exterior noise to 60 dBA CNEL are infeasible, "the development shall not be approved unless a finding is made that there are specifically identified overriding social or economic considerations which warrant approval of the development without such modifications." However, if a project's acoustical study shows that sound levels for any NSLU would be equal to or exceed 75 dBA CNEL even with modifications to the development, "the development shall not be approved, irrespective of social or economic considerations."

For single-family detached dwellings, "exterior noise" is defined as "noise measured at an outdoor living area [that] adjoins and is on the same lot as the dwelling, and which contains at least the following minimum area:

- Net lot area up to 4,000 square feet: 400 square feet
- Net lot area 4,000 square feet to 10 acres: 10% of net lot area
- Net lot area over 10 acres: 1 acres"

For all other projects, exterior noise is defined as "noise measured at all exterior areas [that] are provided for group or private usable open space purposes."

Ramona Community Plan

The 2011 Ramona Community Plan is consistent with the Noise Element standard. The Ramona Community Plan also states that noise standards and mitigation shall be referred to the General Plan goals and policies.

County of San Diego Noise Ordinance

The County Noise Ordinance, Section 36.404, sets limits on the noise levels generated from one property to another, such as from mechanical equipment, and Sections 36.408, 36.409, and 36.410 govern noise generated by construction activities.

Section 36.404. Sound-Level Limits

Unless a variance has been applied for by an applicant and granted by the County, it is unlawful for a person to cause or allow noise generated on a particular property to exceed the 1-hour average sound level, as measured at the property line of the property on which the noise is produced or at any location on a property that is receiving the noise, set forth in Section 36.404 and shown in Table 3.3-3. The noise-level limits vary with the zoning of the properties concerned. The proposed project site is currently zoned a Specific Plan Area (S88) and the adjacent properties are zoned Agricultural A-70 and A-72; the sound level limit is 50 dBA L_{eq} during daytime hours and 45 dBA L_{eq} during nighttime hours.

Section 36.408. Hours of Operation of Construction Equipment

Except for emergency work, it shall be unlawful for any person to operate or cause to be operated, construction equipment:

(a) Between 7 p.m. and 7 a.m.

(b) On a Sunday or a holiday. For purposes of this section, a holiday means January 1st, the last Monday in May, July 4th, the first Monday in September, December 25th, and any day appointed by the president as a special national holiday or the governor of the state as a special state holiday. A person may, however, operate construction equipment on a Sunday or holiday between the hours of 10 a.m. and 5 p.m. at the person's residence or for the purpose of constructing a residence for himself or herself, provided that the

operation of construction equipment is not carried out for financial consideration or other consideration of any kind and does not violate the limitations in Sections 36.409 and 36.410.

Section 36.409. Construction Noise

Except for emergency work, it shall be unlawful for any person to operate construction equipment or cause construction equipment to be operated that exceeds an average sound level of 75 decibels for an 8-hour period, between 7 a.m. and 7 p.m., when measured at the boundary line of the property where the noise source is located or on any occupied property where the noise is being received.

Threatened and Endangered Species

USFWS and other resource agencies, such as ACOE and CDFG, require limitation of noise levels to the habitats of threatened and endangered noise-sensitive songbirds, such as the light-footed clapper rail, least Bell's vireo, and California gnatcatcher, during their breeding seasons. However, no formal standards have been issued by these agencies. In San Diego County, the precedent set over many years is that noise levels generated by a proposed project should not exceed 60 dBA L_{eq} at the designated habitat or a known nesting site. Where the existing ambient noise level exceeds 60 dBA L_{eq}, the project noise level should be limited to less than or equal to the ambient noise level.

3.3.2 Guidelines for the Determination of Significance

The guidelines for the determination of significant noise impacts are based on requirements of local planning documents. The quantitative thresholds listed below reflect the applicable noise-level requirements of the Ramona Community Plan, County of San Diego General Plan, and County Noise Ordinance. The Cumming Ranch project would create a significant noise impact if it would do any of the following:

1. Expose new residential development to road, railroad, airport, or heliport noise in excess of 60 dBA CNEL or expose exterior offsite NSLUs to road, railroad, airport, or heliport noise in excess of 60 dBA CNEL (Noise Element).
2. Expose interior onsite or offsite, existing or planned NSLUs to interior noise in excess of 45 dBA CNEL (Noise Element).

3. Generate non-transportation noise exceeding 50 dBA L_{eq} during daytime hours or 45 dBA L_{eq} during nighttime hours based on an hourly average at or beyond the property line (Noise Ordinance).

4. In cases where existing noise levels already exceed the applicable noise guideline, the following guidelines for significance shall apply:

    a. The onsite operational noise generated by the project would have a measurable and substantial contribution to the existing noise conditions that increase noise levels at or beyond the property line exceeding the property line noise standard specified within the County Noise Ordinance, Section 36.404. The received levels refer to the sum of the combined existing and proposed noise sources.

    b. When the project has identified offsite existing and planned NSLU to experience a cumulative noise impact and project implementation would contribute more than 1 decibel to the cumulative noise impact (cumulatively considerable).

    c. Project implementation would expose offsite existing and planned NSLUs to road, railroad, airport, or heliport noise that increases more than double than the existing noise energy of the site (more than 3 dBA CNEL over existing noise levels).

5. Noise generated by the construction of the project would exceed the standards in the Construction Equipment Section of the Noise Ordinance (75 dBA L_{eq} at or beyond the property line for an average of 8 hours).

6. Noise would exceed a 1-hour average sound level of 60 dBA for noise-sensitive avian habitat on a seasonal basis.

3.3.3 Analysis of Project Effects and Determination of Significant Impact

Construction Noise

Noise impacts from construction are a function of the noise generated by the construction equipment, the location and sensitivity of nearby land uses, and the timing and duration of the noise-generating activities. Noise levels within and adjacent to the project site would increase during the construction period. Construction would not cause long-term impacts since it would be temporary, and daily construction equipment operations would be limited by the County Noise Ordinance (Section 36.409).

No drilling or blasting (pile driving or explosives blasting) would occur as a result of the project, but limited rock breaking and materials handling may be required due to the presence of

subsurface rock. Potential vibrations or groundborne noise associated with construction of the proposed project are typically not encountered with this type of construction.

In general, construction activities are carried out in phases, and each phase has its own noise characteristics based on the mix of construction equipment in use. For purposes of noise assessment, construction equipment operates in two modes: stationary and mobile. Stationary equipment operates in one location for 1 or more days at a time, with either a fixed-power operation, such as pumps, generators, and compressors, or a variable-noise operation, such as pile-drivers, rock drills, and pavement breakers. Mobile equipment moves around the construction site with power applied in cyclic fashion, such as bulldozers, graders, and loaders.

Each phase of construction has a specific equipment mix, depending on the work to be accomplished during that phase. Each phase also has its own noise characteristics; some will have higher continuous noise levels than others, and some have high-impact noise levels. The L_{eq} of each phase is determined by combining the L_{eq} contributions from each piece of equipment used in that phase. In typical construction projects, grading activities typically generate the highest noise levels, as grading involves the largest equipment.

Offsite sensitive receptors that could potentially be affected by construction activities are residences located adjacent to the site boundary. In the southern portion of the project site, south of Highland Valley Road, residential properties are located along the southern and western property lines. In the northern portion of the project site, north of Highland Valley Road, residential properties occur along the western and northern property lines. Residences only occur along the western portion of the northern property line. All construction sites are in open field and are acoustically soft sites, which typically attenuate noise at rate of 7.5 dBA per doubling of distance. At a distance of 100 feet, noise levels could reach as high as 81 dBA during peak construction activity. Such levels could create temporary annoyance; however, peak noise levels would occur only sporadically, since not all equipment would be operating at all times. Also, most construction activity would actually take place at longer distances from the receivers. The average construction equipment noise levels at 100 feet would be less than 75 dBA L_{eq} over a 1-hour period. Based on a review of the preliminary grading plan for the proposed project, the nearest existing residential property line is located at least 110 feet from the center of the nearest proposed building pad.

Most grading for internal roadways would be completed prior to beginning site preparation for individual housing sites. This initial road construction phase represents the largest continuous grading effort and the greatest concentration of heavy construction. With the exception of a 480-foot-long strip south of Highland Valley Road along the eastern portion of site, all internal

project roadways would be at least 130 feet from the project site property boundaries. This 480-foot portion of the internal roadway network passes adjacent to a property zoned for agricultural uses (A-70) and is developed with a residence.

For roadway construction, it was assumed that a maximum of two dozers, one backhoe, and one grader would be working simultaneously at any given time. This mix of equipment would generate a noise level of 87 dBA L_{eq} at 50 feet and approximately 75 dBA L_{eq} at 130 feet. The majority of residential property boundaries are at distances greater than 130 feet, with the exception of a 480-foot-long strip south of Highland Valley Road in the east portion of the site. The centerline of the proposed roadway passes within 30 feet of this property at this location. At this distance, noise levels from roadway construction may reach 92 dBA L_{eq} for a few hours during peak construction activity at the offsite receptor. Thus, the proposed project would exceed Guideline 5 during roadway construction and result in a ***significant impact*** to offsite receptors during construction (**Impact N-1**).

Onsite grading for each building pad would occur in a limited area of each lot and would only include the area necessary for the construction of each house. No grading would occur along the property lines of adjacent existing residential properties. Grading of each building pad is assumed to require a maximum of two pieces of construction equipment, such as one dozer and one loader, at any one time. It is assumed that no more than five contiguous pads would be graded at any time.

For building pad grading, it was assumed, due to a limited working area, that a maximum of one dozer and one front-end loader would be working on any individual building pad at any given time. Based on a distance of 110 feet, average hourly noise levels would equal but not exceed 75 dBA L_{eq}. For a worst-case scenario, it was assumed that a maximum of five pads would be graded at one time. From a noise perspective, the worst location for this would occur just north of Highland Valley Road at Lots 76, 77, 78, 81, and 82. Assuming an average hourly noise level of 82 dBA L_{eq} at 50 feet from the center of each of these sites, and choosing the closest common point along the western property line, the average hourly noise level from the grading of five building pads at once would be approximately 72 dBA L_{eq}. Thus, the noise associated with construction equipment operations would not exceed Guideline 5 and would result in a ***less-than-significant*** impact.

Onsite noise-sensitive receptors would include residences built and occupied prior to completion of the project. The project proposes individual lot sales, and construction noise analysis compliance for onsite occupied structures have been evaluated. Lot-sale phasing is unknown at this time, and County Construction Equipment noise-level requirements are based on the

property line of occupied structures where construction equipment operations are staged. Conceptual building pad locations indicate that the center of construction activities may be as close as 75 feet from adjoining property lines. Assuming the same construction scenario as for the offsite receptors, at a distance of 75 feet, noise levels from a dozer and loader are anticipated to reach approximately 77 dBA L_{eq}, which would exceed the applicable hourly threshold by approximately 2 dBA. Therefore, this temporary exceedance of the County's applicable construction noise threshold per Guideline 5 at onsite receptors would be a ***significant impact*** **(Impact N-2)**.

Rock Breaking and Materials Handling

Rock breaking and materials handling would typically involve the use of jack hammers/rock drills or a mounted impact hammer (hoe ram) to break rock to be extracted by a backhoe or a front-end loader and loaded into a truck for offsite disposal or transport to another portion of the project site. Given the limited size of each development pad, it is anticipated that only two pieces or equipment could operate at a given time in one location. It is assumed that a typical rock extraction scenario would include the operation of an impact tool to break the rock, then the extraction tool would remove the rock and load it onto a transport. No centralized rock crushing would occur onsite. No rock breaking or materials handling would occur within 25 feet of an occupied existing or future residential property. At 50 feet, a hoe ram operating alone would generate a noise level of approximately 83 dBA L_{eq}. Thus, at distance less than 125 feet, noise levels from rock breaking activities could exceed the County interpretation of the construction noise ordinance, and would result in a potentially ***significant impact*** **(Impact N-3)** because noise could exceed Guideline 5.

Noise Levels at Sensitive Avian Habitat

Typical construction activities, including rock breaking and materials handling as described above, would generate noise levels in excess of 60 dBA L_{eq} at distances of 500 feet or closer from roadway construction and 350 feet or closer from building pads. All proposed roadways and the majority of building pads would occur within these distances of potential habitat of noise-sensitive avian species. Therefore, construction noise is anticipated to exceed the applicable 60 dBA L_{eq} threshold for noise in sensitive avian habitat as outlined in Guideline 6 and would be a ***significant impact*** **(Impact N-4)**.

Offsite Project-Related Roadway Noise

The proposed project would increase traffic volumes on local roadways. Noise increases would be greatest nearest the project site on Highland Valley Road, as the greatest concentration of project-related traffic would occur along this roadway. Offsite traffic noise impacts were evaluated based on the calculated change in noise levels due to the increase or decrease in traffic volumes.

As shown in Table 3.3-4, noise levels along Highland Valley Road, SR 67, and Dye Road would increase less than 2 dBA CNEL with implementation of the proposed project. It is widely accepted that the average healthy ear can barely perceive noise-level changes of 3 dB (Caltrans 1998). For this reason the increase of 2 dBA would not be a noticeable change to noise levels. Noise-level increases adjacent to SR 67 and Dye Road would be 1 dBA or less, which is a less-than-significant increase in noise levels per Guideline 3. Therefore, these increases in noise are ***less than significant***.

Traffic Noise and Land Use Compatibility

Noise levels within the proposed project site would be primarily influenced by traffic noise from SR 67 and Highland Valley Road. Internal project streets would contribute a minor amount of traffic noise to the overall site, as these streets would have limited speeds, would not create any new thoroughfares, and would only be used by residents of the proposed development and their guests. This land use compatibility analysis with noise levels is analyzed based on LOS C future volumes (most traffic volume at highest speed).

The roadways of primary concern would be SR 67 and Highland Valley Road. Future noise levels affecting the compatibility of the project site were estimated using projected future traffic volumes and the same traffic speeds, traffic mixes, and site parameters used to model existing peak-hour noise levels. Each lot was modeled individually using a conceptual lot layout, placing the exterior-use areas closest to the roadway to calculate the most conservative noise scenario (i.e., the loudest possible scenario). The modeled noise levels are shown in Table 3.3-5. CNEL values were developed using the future noise levels for each roadway and 24-hour traffic data for SR 67 to calculate the percentage of daytime, evening, and nighttime traffic. Predicted CNEL contour distances are shown in Figures 3.3-3, 3.3-4, and 3.3-5, and outlined in Table 3.3-6.

Based on the contours shown in Figures 3.3-3, 3.3-4, and 3.3-5, portions of Lots 5 through 11, Lots 39 through 41, Lots 55 through 57, Lots 70 through 77, and Lots 98 and 99 would be exposed to noise levels higher than 55 dBA CNEL. Smaller portions of all of these lots, with the

exception of Lots 11, 39, 41, 55, 56, and 99, would also be exposed to noise levels higher than 60 dBA CNEL. All other proposed lots would be located outside of the 60 dBA CNEL contours, and would be compatible with future noise levels. Based on an exceedance of Guideline 1 and a conservative analysis using a restrictive standard of 55 dBA CNEL to represent second-story future noise contours of 60 dBA CNEL, there would be a ***significant impact*** on Lots 5 through 11, Lots 39 through 41, Lots 55 through 57, Lots 70 through 77, and Lots 98 and 99, if the new NSLUs are located within the 55 and 60 dBA CNEL contour **(Impact N-5)**.

Aircraft Noise and Noise-Land Use Compatibility

The portion of the project site that would be developed with noise-sensitive use is located approximately 1 mile south of the Ramona Airport. Based on a review of the Ramona Airport Land Use Compatibility Plan (San Diego County Airport Land Use Commission 2006), no NSLUs associated with the proposed project would be located within the Ramona Airport's 55 dBA CNEL. Therefore, the proposed project would not be adversely affected by aircraft operations at the Ramona Airport, and aircraft-related noise impacts would be ***less than significant*** because Guideline 1 would not be exceeded.

Noise Generated Onsite

The project would include installation of a sewer lift station. The lift station would be located within an individual lot and require a Minor Use Permit. The lift station lot would be 130 feet by 120 feet, and located approximately 100 feet east of Lot 125, 250 feet northeast of Lot 110, and approximately 150 feet south of the northern property line of Area A. To determine the anticipated noise generated during typical operations, a field survey and noise measurements of similar equipment were completed. It was assumed that the lift station would require a standby generator, a pressure regulation pump, and an odor-control pump fan.

Noise from the proposed lift station to the nearest property boundaries were estimated based on the noise measurements taken at representative pump stations. The distance calculations are based on the distance from the center of the lift station lot to the boundary of the same lot (approximately 60 feet). Noise generated by the lift station would exceed the daytime noise-level limit at the property line due to testing of the standby generator, and would be expected to exceed the County's Noise Ordinance daytime limits at any property within 515 feet of the lift station without shielding, as shown in Table 3.3-7. Guideline 3 would be exceeded and this would be a ***significant impact*** (**Impact N-6**).

3.3.4 Cumulative Impact Analysis

The cumulative study area for noise was determined to include those roadway segments throughout the Ramona community that would have an increase in traffic as a result of the proposed project and, thus, a potential increase in noise. This area includes the SR 67 corridor from Scripps Poway Parkway north to SR 76, the Highland Valley Road corridor west of SR 67, and the Dye Road corridor east of SR 67; this is the same as the cumulative traffic study area. Cumulative traffic noise levels were estimated using traffic volumes from the traffic report (Appendix A). Table 3.3-4 shows forecast traffic noise for the cumulative scenario. There is a cumulative noise impact to an offsite NSLU if the existing noise conditions double, according to the County's CEQA Guidelines for Determining Significance.

As shown in Table 3.3-4, noise levels in areas affected by SR 67 and Highland Valley Road are forecast not to double the existing noise levels, which is a less-than-significant cumulative increase in traffic noise levels. The greatest increase in noise levels due to cumulative traffic conditions would be along Dye Road east of SR 67, where noise levels would increase by approximately 2.8 dBA CNEL, which is not doubling the existing noise conditions. This area is currently undeveloped. An increase of 3 dBA CNEL would not be a significant increase in noise levels. The project's contribution to cumulative noise does not have to be evaluated because there are no cumulative noise impacts identified, and the project's contribution is not cumulatively considerable. Therefore, the cumulative impact is considered ***less than significant*** according to Guideline 4b.

3.3.5 Mitigation Measures

Mitigation Measure M-N-1 Construction Noise – Offsite Receptors

During construction of the internal street system south of Highland Valley Road, a 14-foot-high inversed L-shaped temporary noise barrier 420 feet in length shall be constructed along the project boundary as shown in Figure 3.3-6.

Mitigation Measure M-N-2 Construction Noise – Onsite Receptors

The project proposes individual lot sales, and construction noise analysis compliance for onsite occupied structures have been evaluated. Lots sale phasing is unknown at this time and, therefore, construction equipment noise-level requirements must be flexible to address locations where structures are built and occupied, and where construction equipment operations are being staged. Although phasing and completion of construction equipment operations is unknown, this

mitigation measure is broad enough to ensure compliance with County noise standards in all situations:

> **M-N-2:** When construction sites are located within 75 feet of an occupied residential property line, temporary noise barriers, with a minimum height of 8 feet, shall be required to block the line-of-sight from the occupied residence to the active construction site.

Mitigation Measure M-N-3 Rock Breaking and Material Handling

Although mitigation measures are proposed for material processing onsite, the specific locations for these activities are not known at this time. Therefore, this mitigation measure is broad enough to ensure compliance with County noise standards in all situations:

> **M-N-3:** When rock breaking activities are located within 125 feet of an occupied residential property line, temporary noise barriers with a minimum height of 8 feet shall be required. The temporary barriers shall be constructed no more than 5 feet from the point of impact and to block the line of sight from the active rock breaking/material handling site to the occupied residence.

The proposed barrier shall provide an approximately 18-dBA reduction from impact noise associated with rock breaking, which would reduce potential construction noise levels at future residential property lines to 73 dBA L_{eq}.

Mitigation Measures M-N-4 Noise-Sensitive Avian Habitat

The following measures shall be required to reduce the short-duration impact of construction-related noise to sensitive avian habitat:

a. Where feasible, the project shall avoid construction within 500 feet of habitat for noise-sensitive species, between January 15 through September 15.

b. If the preconstruction biological surveys required under Impact BI-15 determine nests of noise-sensitive avians are present in the habitat, or construction noise would have a significant impact on the species using the habitat, an acoustical study shall be prepared to assess noise sources, determine noise levels in the habitat, and determine mitigation measures capable of reducing noise levels to 60 dBA L_{eq} or less. If noise levels from construction cannot be reduced to below 60 dBA L_{eq}, construction shall not be allowed January 15 through September 15.

Avoiding construction or reducing construction noise levels to 60 dBA L_{eq} or less would reduce potential construction noise levels within habitat for noise-sensitive species to below the level identified in Guideline 6.

Mitigation Measure M-N-5 Traffic Noise Levels and Land Use Compatibility

Due to the potential conflicts with the proposed land uses and predicted future noise levels along Highland Valley Road and SR 67, the following measures shall be required to reduce potential traffic noise impacts to a less-than-significant level and to ensure that the proposed project complies with the County's noise standards. As detailed in the Noise Analysis for the project, conceptual feasibility analysis modeling was completed and found that all lots could allow for exterior residential use below the 60-dBA CNEL threshold.

a. Prior to approval of the Final Map, in accordance with the San Diego General Plan Noise Element, the applicant shall dedicate to the County of San Diego "noise restriction easements" on each of Lots 5 through 11, Lots 55 through 57, Lots 70 through 77, and Lots 98 and 99 over the area of the property from the lot line at the edge of Highland Valley Road to a line 300 feet from the centerline of Highland Valley Road. These easements shall be for the protection of NSLUs from traffic noise. The noise restriction easements shall be shown on the Final Map.

   Prior to approval of the Final Map, in accordance with the San Diego County General Plan Noise Element, the applicant shall dedicate to the County of San Diego "noise restriction easements" on each of Lots 39 through 41 from the lot line at the edge of SR 67 to a line 795 feet from the centerline of SR 67. These easements shall be for the protection of NSLUs from traffic noise. The noise-restriction easements shall be shown on the Final Map.

   These noise-restriction easements shall require that, prior to the issuance of a Building Permit for residences located within the noise-restriction easement, evidence shall be provided to the satisfaction of the planning director that exterior (outdoor) noise levels comply with the applicable NSLU noise-level limits and land-use compatibility guidelines of the County. The NSLU area does not include the entire lot, but includes an area of reasonable size that adjoins the home to allow exterior use by single-family residents at noise levels of 60 dBA CNEL or below. If noise barriers are required for compliance with the noise easement, barriers could be made of masonry, wood, and transparent materials, such as glass or Lucite. Earthen berms or a combination of berms and walls would also provide noise attenuation. The noise-restriction easement language shall contain a restriction stating that the structure and the exterior living area shall be placed such that a noise barrier will complement the residences architecture and will not incorporate a solid (opaque) wall in

excess of six feet. Conceptual modeling was prepared and is provided in the noise study (Appendix F) to show feasibility of noise reduction for each impacted lot. The conceptual noise barrier locations are shown on Figure 3.3-7.

b. Noise barriers, as described above, would not reduce noise levels at second story elevations. Where two-story homes would be built in the area of properties where future noise levels, without abatement, are forecast to approach or exceed 60 dBA, the Building Permit applicant shall demonstrate that interior noise levels due to exterior noise sources would not exceed 45 dBA. Compliance shall require the submittal of a report, with the building plans identifying the noise attenuation features included in the project's design to maintain interior noise levels at or below 45 dBA.

   In these cases, it is anticipated that the typical method of compliance would be to provide the homes with air conditioning or equivalent forced air circulation to allow occupancy with closed windows, which, for most residential construction, would provide sufficient exterior-to-interior noise reduction.

Mitigation Measure M-N-6 Stationary Noise Sources – Lift Station

Prior to the issuance of improvement plans or grading permits for the TM, the project applicant shall demonstrate that the sewer lift station noise will comply with the County Noise Ordinance (Section 36.404). To verify noise compliance, a Minor Use Permit or Site Plan shall be required to verify ongoing compliance. As part of the Minor Use Permit, the applicant shall develop and submit site plans for the lift station and proposed enclosure, and a noise study demonstrating the lift station's compliance with the County Noise Ordinance, Section 36.404 regulations of 50 dBA L_{eq} during daytime hours (and 45 dBA during nighttime hours) at the lot line, and provide any necessary abatement measures to achieve this noise level. Abatement measures required to reduce noise levels may require complete enclosure of the equipment, specific orientation of the noise-generating equipment, noise barriers, or berms. Specifications and recommendations from this study shall be incorporated into the final site plans to the satisfaction of the Director of the Department of Planning and Land Use.

3.3.6 Conclusion

Construction noise levels may exceed County noise level standards for construction activities at the property line of one offsite receptor (**Impact N-1**). With the identified mitigation, the potential construction impacts to the existing offsite residence from general construction would be reduced to ***less than significant*** because the proposed temporary barrier would attenuate noise

levels by approximately 18 dBA. This would reduce the noise level to 74 dBA L_{eq} and meet the noise standard in Guideline 5 at the intervening property line.

Noise-sensitive receptors would include residences built and occupied prior to completion of the project. Noise modeling determined that, at a distance of 75 feet, noise from a dozer and loader is anticipated to reach approximately 77 dBA L_{eq} at the property line, which would exceed the applicable hourly threshold by approximately 2 dBA (**Impact N-2**). Mitigation consisting of a temporary barrier to block the line-of-sight from the noise source to surrounding receptors would provide a minimum of 5-dBA reduction from general construction, which would reduce potential construction noise levels at residential property lines to 72 dBA L_{eq}. With the identified mitigation, the potential construction noise impacts to future residences from general construction would be reduced to ***less than significant*** according to Guideline 5.

Noise from rock breaking and materials handling would occur during construction and, at distances less than 125 feet from sensitive receptors, could exceed the County interpretation of the construction noise ordinance **(Impact N-3)**. When rock-breaking activities are located within 125 feet of an occupied residential property line, temporary noise barriers would be constructed to provide approximately 18-dBA reduction from impact noise associated with rock breaking, which would reduce potential construction noise levels at future residential property lines to 73 dBA L_{eq}. Thus, construction noise due to rock breaking would be ***less than significant*** per Guideline 5.

Project construction could result in temporary impacts to noise-sensitive avian species on the project site based on the proximity of their habitat to areas of construction (**Impact N-4**). Avoiding construction or reducing noise levels to 60 dBA L_{eq} or less would reduce potential construction noise levels within habitat for noise-sensitive species to below the level identified in Guideline 6. Thus, with the identified mitigation, the potential construction impacts to noise-sensitive habitat from general construction would be reduced to ***less than significant*** in accordance with Guideline 6.

The analysis of future traffic noise levels indicates that traffic generated by the project would increase noise levels along affected roadways by less than 3 dBA CNEL. Thus, the increase would not result in any direct noise impacts, and offsite traffic noise impacts would be ***less than significant*** per Guideline 4c.

The majority of the land uses proposed for the project site would be compatible with the existing and future noise environment except for proposed residential lots located within 300 feet of the center line of Highland Valley Road and 795 feet of the center line of SR 67 where future traffic

noise levels would exceed 55 dBA CNEL and potentially exceed the 60 dBA CNEL Ramona Community Plan noise level requirement. A noise protection easement would be placed on all impacted lots; this would require verification that there is a reasonable area of outdoor use adjacent to each residence that has noise levels below the 60-dBA CNEL threshold as outlined in Guideline 1. Conceptual modeling was prepared to show feasibility of achieving the 60-dBA or less threshold for each impacted lot. With implementation of this measure, the impact (**Impact N-5**) would be ***less than significant*** because noise would be reduced to below the standards outlined in Guidelines 1 and 2.

Stationary noise sources associated with the proposed project are related to a sewer lift station that would serve the proposed residences. Noise generated by the lift station could exceed the daytime noise limit at the property line due to testing of the standby generator, and would be expected to exceed the County's Noise Ordinance, Section 36.404 daytime limits of 50 dBA at the property boundary if noise attenuation is not provided. A Minor Use Permit or Site Plan would be required for the lift station, which would require a noise study specific to the exact equipment to be installed at the lift station and would include specific enclosure details and/or other measures that would reduce the noise level at the nearest property line to comply with the County Noise Ordinance per Guideline 3. With implementation of this measure, the impact (**Impact N-6**) would be reduced to ***less than significant*** because a noise study will have demonstrated that the specific equipment and structure would lower noise from the lift station such that it would not exceed the standard in Guideline 3**.**

Source: Snipe Dye 2008; Digital Globe 2008.

Figure 3.3-1a
Noise Measurement Locations Map A

P:\2008\08080045 Cumming Ranch\6Graphics\Figures\4th Iteration EIR\Figure 3.3-1a noise.ai dbrady 10/21/10

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Source: Snipe Dye 2008; Digital Globe 2008.

400 200 0 400 Feet

Scale: 1:4,800; 1 inch = 400 feet

Note: Lot 109 was relocated after public review of the EIR. For the new location, see Figure 1-5.

Figure 3.3-1b
Noise Measurement Locations Map B

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Source: Snipe Dye 2008; Digital Globe 2008.

400 200 0 400 Feet

Scale: 1:4,800; 1 inch = 400 feet

Figure 3.3-2a
Noise Receptor Locations Map A

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Source: Snipe Dye 2008; Digital Globe 2008.

Figure 3.3-2b
Noise Receptor Locations Map B

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Source: Snipe Dye 2008; Digital Globe 2008.

200 100 0 200 Feet

Scale: 1:2,400; 1 inch = 200 feet

Figure 3.3-3
Future Noise Level Contours
Highland Valley Road - West

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Source: Snipe Dye 2008; Digital Globe 2008.

200 100 0 200 Feet

Scale: 1:2,618; 1 inch = 218 feet

Figure 3.3-4
Future Noise Level Contours
Highland Valley Road - East

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Source: Snipe Dye 2008; Digital Globe 2008.

200 100 0 200
Feet

Scale: 1:1,800; 1 inch = 150 feet

Figure 3.3-5
Future Noise Level Contours
SR 67

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Source: Snipe Dye 2008; Digital Globe 2008.

150 75 0 150
Feet
1 inch equals 150 feet

Figure 3.3-6
Temporary Noise Barrier Location

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Source: Snipe Dye 2008; Digital Globe 2008.

500 250 0 500
Feet
1 inch equals 500 feet

Figure 3.3-7
Conceptual Noise Barrier Locations

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Table 3.3-1
Existing Noise Measurement Levels

Site ID[1]	Location	Time	dBA L_{eq}	dBA L_{max}	dBA L_{min}
1	50 feet north of SR 67 at Boortz Lane	09:51 – 10:05	66	81	40
2	Southwestern corner of project site, Lot 47	09:51 – 10:05	46	72	36
3	50 feet northwest of SR 67 (3725 SR 67)	10:27 – 10:40	66	77	40
4	Lot 40 location	10:27 – 10:40	49	74	38
5	100 feet north of Highland Valley Road (Lot 76)	12:44 – 13:01	55	76	36
6	Along northern property line west of Lot 110	19:30 – 03:00	46	80	33

[1] Site ID corresponds to locations shown in Figures 3.3-1a and 3.3-1b.

Notes: All daytime measurements were taken on June 30, 2004. The nighttime noise measurement at Site 6 began on June 30, 2004, at 7:30 PM and ended July 1, 2004, at 3:00 AM.

Table 3.3-2
Existing Onsite Peak Hour Noise Levels

Receptor ID[1]		Existing Noise Level dBA L_{eq}	Existing Noise Level CNEL
1	50 feet north of SR 67 at Boortz Lane	72	73
2	Southwestern corner of project site (Lot 47)	52	53
3	50 feet northwest of SR 67 (3725 SR 67)	69	70
4	Lot 40	53	54
5	100 feet north of Highland Valley Road (Lot 76)	59	60
6	Lot 45	50	51
7	Lot 42	50	51
8	Lot 39	53	54
9	Lot 11	55	56
10	Lot 9	60	61
11	Lot 6	59	60
12	Lot 57	60	61
13	Lot 74	59	60
14	Lot 72	58	59
15	Lot 70	60	61
16	Lot 98	59	60
17	Lot 4	52	53

[1] Receptor ID numbers correspond to location shown in Figures 3.3-2a and 3.3-2b.

Note: Based on 24-hour traffic volume data and assuming a peak-hour traffic volume of 10%, CNEL values for areas affected by the proposed project are calculated to be equal to 1 dBA higher than the predicted peak-hour noise level.

Table 3.3-3
County of San Diego Noise Ordinance Sound-Level Limits

Zone	Applicable Hours	Sound Level Limit dB $L_{eq\ (1\ hour)}$
(1) RS, RD, RR, RMH, A70, A72, S80, S81, S87, S90, S92, and RV and RU Use Regulations with a density of less than 11 dwelling units per acre	7 AM to 10 PM 10 PM to 7 AM	50 45
(2) RRO, RC, RM, S86, V5, and RV and RU Use Regulations with a density of 11 or more dwelling units per acre	7 AM to 10 PM 10 PM to 7 AM	55 50
(3) S94, V4, and all other commercial zones	7 AM to 10 PM 10 PM to 7 AM	60 55
(4) V1, V2 V1, V2 V1 V2 V3	7 AM to 7 PM 7 PM to 10 PM 10 PM to 7 AM 10 PM to 7 AM 7 AM to 10 PM 10 PM to 7 AM	60 55 55 50 70 65
(5) M50, M52, M54	Anytime	70
(6) S-82, M-58, A-72, and all other industrial zones	Anytime	75
(7) S88 (see subsection c below)		

Source: County of San Diego Noise Ordinance, Section 36.404.

Section 36.404 excerpts:

(b) Where a noise study has been conducted and the noise mitigation measures recommended by that study have been made conditions of approval of a Major Use Permit, which authorizes the noise-generating use or activity and the decision making body approving the Major Use Permit determined that those mitigation measures reduce potential noise impacts to a level below significance, implementation and compliance with those noise mitigation measures shall constitute compliance with subsection (a) above.

(c) S88 zones are Specific Planning Areas which allow different uses. The sound level limits in Table 36.404 above that apply in an S88 zone depend on the use being made of the property. The limits in Table 36.404, subsection (1) apply to property with a residential, agricultural, or civic use. The limits in subsection (3) apply to property with a commercial use. The limits in subsection (5) apply to property with an industrial use that would only be allowed in an M50, M52, or M54 zone. The limits in subsection (6) apply to all property with an extractive use or a use that would only be allowed in an M56 or M58 zone.

(d) If the measured ambient noise level exceeds the applicable limit in Table 36.404, the allowable one-hour average sound level shall be the one-hour average ambient noise level, plus three decibels. The ambient noise level shall be measured when the alleged noise violation source is not operating.

(e) The sound level limit at a location on a boundary between two zones is the arithmetic mean of the respective limits for the two zones. The one-hour average sound level limit applicable to extractive industries, however, including but not limited to borrow pits and mines, shall be 75 decibels at the property line regardless of the zone in which the extractive industry is located.

(f) A fixed-location public utility distribution or transmission facility located on or adjacent to a property line shall be subject to the sound level limits of this section measured at or beyond six feet from the boundary of the easement upon which the facility is located.

Table 3.3-4
Project Related Noise Level Increases

Roadway	Segment	Average Daily Traffic Volumes			Project Percentage Increase over Existing	Cumulative Percentage Increase Over Existing	Project Noise Level Increase (dBA)	Cumulative Noise Level Increase (dBA)
		Existing	Existing + Project	Existing + Cumulative				
SR 67	Scripps Poway Parkway to Poway Road	21,654	22,134	29,532	2.2%	36.4%	0.1	1.3
	Poway Road to Archie Moore Road	25,462	26,392	32,862	3.7%	29.1%	0.2	1.1
	Archie Moore Road to Mussey Grade Road	23,947	24,992	31,645	4.4%	32.1%	0.2	1.2
	Mussey Grade Road to Pala Street	24,250	24,475	30,190	0.9%	24.5%	0.0	1.0
	Pala Street to SR 78	30,250	30,665	35,800	0.5%	17.4%	0.0	0.7
Highland Valley Road	West of SR 67	3,167	3,392	5,092	7.1%	60.8%	0.3	2.1
Dye Road	East of SR 67	6,128	6,203	11,870	1.2%	93.7%	0.1	2.8

Source: RCE 2010

Table 3.3-5
Predicted 2030 Onsite Noise Levels

Receptor ID	Location	2030 Noise Level (dBA CNEL)	Is the noise level compatible?	
			County Noise Element Standards (60 dBA CNEL)	55 dBA CNEL (Conservative Equivalent to the Second-Story Receptors)
1	50 feet north of SR 67 at Boortz Lane	75	NA	NA
2	Southwestern corner of project site (Lot 47)	55	Yes	Yes
3	50 feet northwest of SR 67 (3725 SR 67)	72	NA	NA
4	Lot 40	56	Yes	No
5	100 feet north of Highland Valley Road (Lot 76)	62	No	No
6	Lot 45	53	Yes	Yes
7	Lot 42	53	Yes	Yes
8	Lot 39	56	Yes	No
9	Lot 11	58	Yes	No
10	Lot 9	64	No	No
11	Lot 6	62	No	No
12	Lot 57	63	No	No
13	Lot 74	63	No	No
14	Lot 72	62	No	No
15	Lot 70	63	No	No
16	Lot 98	63	No	No
17	Lot 4	55	Yes	Yes

Note: Based on 24-hour traffic volume data and assuming a peak-hour traffic volume of 10%, CNEL values for areas affected by the proposed project are calculated to be 1 dBA higher than the predicted peak-hour noise level.

Table 3.3-6
CNEL Contour Distance from Center of Highland Valley Road and SR 67

Roadway/Segment	dBA CNEL at 100 Feet	Distance to 55 dBA CNEL Noise Contour (in feet)	Distance to 60 dBA CNEL Noise Contour (in feet)	Distance to 65 dBA CNEL Noise Contour (in feet)
Future 2030				
Highland Valley	62	300	140	65
SR 67 – Southwest of Highland Valley Road	68	795	370	175

Notes: Peak-hour noise levels and CNEL distance values are based on acoustically soft site conditions. CNEL values were developed from the 24-hour traffic-mix data and peak-hour traffic data for each roadway segment derived from the project traffic report turning movements and average daily trip volumes.

Table 3.3-7
Lift Station Noise Levels

Receptor Location	Noise Source	Noise Level at 23 Feet, dBA L_{eq}(1)	Shortest Distance to Property Line (Feet)	Reduction Due to Distance (dBA)	Noise Level at Property Line (dBA)	Combined Noise Level dBA L_{eq}(1)
Daytime Noise Levels (50 dBA standard)						
Sewer Lot Property Boundary	Standby Generator	72	60	8	64	64
	Odor Control Pump	55	60	8	47	
	Pressure Regulation Pump	36	60	8	28	
Nighttime Noise Level (45 dBA standard)						
Sewer Lot Property Boundary	Odor Control Pump	55	60	8	47	47
	Pressure Regulation Pump	36	60	8	28	

[1] Distance calculations are based on an acoustically hard site.

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3.4 Aesthetic and Visual Quality

The purpose of this section is to evaluate potential impacts to visual resources that could result from project implementation. This section summarizes information from the Visual Resources Assessment (AECOM 2010b) that was prepared for this project, which is included as Appendix G.

3.4.1 Existing Conditions

Existing Visual Character

Cumming Ranch is located in a rural area, with residential development located generally along the main transportation thoroughfares. Single-family homes are scattered throughout the area and are primarily accessed via dirt roads. Most of the houses are one story and are of varying architectural styles, shapes, and construction materials. There is no unifying architectural theme. Large animals, such as horses, are allowed within the residential lots, and their presence adds to the "country" feel of the area. Landscaping varies from property to property. There are clusters of ornamental or native trees near many of the homes. In hillier areas, rock outcrops are incorporated into the landscape design. Fencing of varying materials and heights runs along most lot lines and adds linear details to the viewscape.

Commercial establishments are limited in the vicinity of the project site, and those that do exist are small and modest in design. The few businesses located along SR 67 in this area are low profile, with minimal visibility and signage. The Ramona Airport and associated structures are located adjacent to the northern boundary of the project site. There are no large-scale industrial areas near Cumming Ranch, so there are generally no utilitarian big-box structures in the vicinity. The SMWWTP to the east of the project site is generally hidden from the view of homes along Sawday Street and, therefore, does not detract from the rural atmosphere.

The surrounding mountains add a dramatic scenic backdrop to the Ramona area. The hills, covered with native vegetation and punctuated with numerous rock clusters, create a varied and visually interesting horizon.

In Area A, open fields of farmland or grasses are interrupted by scattered rock outcrops or clusters of trees. Farming activities have carved odd shapes into the flatter areas of the site, but the crops are low profile and contribute to the overall sense of open space. The three knolls north of Highland Valley Road are largely undisturbed and have the highest elevation in the Santa Maria Valley area north and west of SR 67. Dry farming occurs on Area B and the site is a

relatively flat expanse of crops. Adding to the open feeling are the adjacent grasslands in Area C and to the northwest.

Project Viewshed

The geographic limit for the visual assessment is the viewshed boundary. The viewshed is defined as the surrounding geographic area from which the project is likely to be seen, based on topography, land use patterns, and landscaping. The viewshed boundary for the project was determined in the field and through analysis of aerial and topographic maps.

The viewshed for Cumming Ranch is an irregularly shaped area due to the varied terrain in the vicinity. A map of the viewshed is shown in Figure 3.4-1. The viewshed to the east of Areas B and C extends only to the homes that front Sawday Street. These houses and associated landscaping obscure views from areas farther to the east. The immediate area to the southeast of Areas A and B generally has limited views of the property due to the presence of a small hill. The viewshed encompasses portions of SR 67 consisting of a segment from approximately Mussey Grade Road to Carnation Avenue, and a segment from north of Rancho Maria Lane to south of South Hope Street. Much of the property, however, cannot be seen from SR 67 because of intervening topography. The portion that can be seen is limited to the central knoll line and areas to the east and south of that feature.

The viewshed boundary on the south and west of Area A is limited to an area north of SR 67 because of topography, structures, and landscaping. However, several houses on the hillside south of SR 67 have a possible view of portions of the site. The Santa Maria Creek area, which extends to the northwest and northeast of Cumming Ranch, is relatively level and undeveloped, and enables more distant views of the property.

Viewer Sensitivity

Viewer response consists of two elements: (1) viewer sensitivity and (2) viewer exposure. These elements combine to form a method of predicting how the public might react to visual changes brought about by a project. Viewer sensitivity is defined by the viewers' concern for scenic quality and how the viewers respond to change in the visual resources that make up the view. Local values and goals may give visual significance to landscape components and areas that would otherwise appear unexceptional in a visual resource analysis. Persons may be sensitive to projects that fall short of local visual goals. Viewer exposure is typically assessed by measuring the number of viewers exposed to the resource change, the type of viewer activity, the duration

of their view, the speed at which the viewer moves, and the position of the viewer. High viewer exposure may increase the potential significance of a change in the visual environment.

Viewer sensitivity in the vicinity of Cumming Ranch varies due to the different types of viewers and their visual quality expectations. The viewshed has several viewer groups: motorists, residents, recreationalists (trail users), and workers and patrons. Viewer sensitivity ranges from low for workers and patrons to high for hikers/equestrians and motorists on scenic highways. Table 3.4-1 summarizes the viewer response for four individual viewer groups. Additional explanation of the viewer groups is provided in the Visual Resources Assessment included in Appendix G.

Applicable Planning Documents

A number of planning documents set forth goals, policies, and restrictions that relate to the visual environment of the Cumming Ranch project. The applicable plans are described below.

Conservation and Open Space Element of the San Diego County General Plan

SR 67 is recommended as part of the County Scenic Highway System (Soledad Freeway to Anza Expressway) in the San Diego County General Plan, as is Highland Valley Road (County of San Diego 2011a). The goal identified in the County's Conservation and Open Space Element is the preservation of scenic highways, corridors, regionally significant scenic vistas, and natural features, including prominent ridgelines, dominant landforms, reservoirs, and scenic landscapes. SR 67 is not an officially designated California Scenic Highway, but it is part of the County's Scenic Highway System.

County Trails Program – Community Trails Master Plan

The purpose of the Community Trails Master Plan is to guide community trail development and management in the unincorporated County (County of San Diego 2005a). It also incorporates the concept of pathways (trails within public road ROWs) and describes them as an integral part of many community trail systems. The Ramona Community Trails and Pathway Plan is part of the overall Community Trails Master Plan, and is the local trail planning document specific to the Ramona area. The Ramona Community Trails and Pathway Plan states that Ramona strives to retain its rural character, and a viable trail system will help to achieve that goal and provide a safe and healthy means to get from one place to another within the community (County of San Diego 2005a). The design and look of the trails is also outlined in the plan to maintain the rural character of the area.

San Diego County Light Pollution Code

The County has established a light pollution code (County Code Section 51.201) that is intended to "minimize light pollution for the enjoyment and use of property and the night environment by the citizens of San Diego County and to protect the Palomar and Mount Laguna observatories from the effects of light pollution that have a detrimental effect on astronomical research by restricting the permitted use of outdoor light fixtures on private property." Cumming Ranch is located 23 miles from Palomar Observatory and 30 miles from Mount Laguna Observatory. Therefore, the property is located in Zone B as defined by the light pollution code. Zone B allows low-pressure sodium lamps and other lamps above 4050 lumens if they are fully shielded. Lamps that are 4050 lumens and below (standard incandescent, 150-watt halogen, 40-watt fluorescent) are allowed in Zone B.

Ramona Community Plan

The Ramona Community Plan (County of San Diego 2011a) has a number of goals and policies that pertain to visual resources. Aesthetic goals that pertain to the project can be found in the Community Character, Trails, and Scenic Highways sections of the Ramona Community Plan. These goals are detailed in the Visual Resources Assessment in Appendix G.

3.4.2 Guidelines for the Determination of Significance

The guidelines for determination of visual impact significance are based on the CEQA Guidelines for visual analysis. The guidelines were appropriately modified to account for the high value of the local rural character and importance of visual pattern and scale related to the surrounding community. The proposed project would have a significant impact if it would do any of the following:

1. Result in a demonstrable, significant adverse effect on a scenic vista or scenic highway.
2. Result in a substantial landform alteration.
3. Produce excessive light or glare, or have dark sky impacts.
4. Change the composition of visual pattern to be incompatible with the existing visual character in terms of dominance, scale, diversity, and continuity, or with the Ramona Community Plan.
5. Result in cumulatively considerable impacts related to its effect on a County-designated scenic route or due to its bulk and scale as compared to surrounding land uses.

3.4.3 Analysis of Project Effects and Determination of Significant Impact

Permanent Visual Effects

Visual Character

The visual character of the site would change from vacant land, including grassy valleys and bolder strewn hills, to a rural residential community with some manufactured slopes, landscaping, and open space. The primary views from Highland Valley Road and SR 67 would change from vacant land to residential on 1- to 3-acre lots. Surrounding land uses consist of urban development associated with the Ramona Town Center (including the Ramona Airport) to the north and east, the Ramona Town Center with single-family homes and the SMWWTP to the east of Areas B and C, rural residential homes to the north of the Area A boundary and south and west of the site, and a large area of open grasslands to the northwest of the project site. Although the project would change the visual character of the site by introducing new development to the area, the altered appearance would be compatible with existing surrounding residential development. The proposed lots would be designed to be consistent with the rural character of the Ramona community, and to transition as seamlessly and as naturally possible with the adjoining grasslands, as there will be minimal grading and preservation of ridgelines and hilltops. The project design includes significant open space; no street lights; provisions for the keeping of horses and other large animals; room for agricultural uses; and preservation of significant hills, drainages, and other natural features, such that the community will view mostly open rural space from public viewpoints. Therefore, the more distant views from the primary roads in Ramona would not change.

With adherence to the design guidelines detailed in the Cumming Ranch Specific Plan and the design restrictions in the site plan for the residences, the viewscape of the completed project would be compatible with that of the surrounding area. Implementation of the project would create a change in the visual environment of the project site; however, through features of the project, including minimal grading, maintaining natural features (ridgelines, hilltops, boulders, and trees), natural landscaping, large open space areas, and other design measures, the change to the project site would be visually minimized and the resulting impact would be ***less than significant***.

The design guidelines contained within the Cumming Ranch Specific Plan outline recommended landform modification, architectural treatment, lighting, and landscaping in character with the natural terrain of the visual environment by preservation of natural features (drainages, oak trees, and rock outcrops) of the site and allowing agricultural uses within the residential lots to enhance

the project as a rural residential development and align the project with the planning objectives for the community. The Cumming Ranch project Landscape Concept Plan would provide a cohesive plant palette to create visual unity and soften manufactured slopes at the site. The County's Light Pollution Code would place restrictions on lighting sources. Adherence to existing regulations and project design concepts would further reduce any potential for visual impacts, even though the visual environment would trend from agricultural to rural residential. The large-scale changes to the visual environment resulting from the proposed project would be ***less than significant***.

Analysis of Key Views

Analyzing all possible views from which the proposed Cumming Ranch project would be seen is not feasible. It is, therefore, necessary to select several representative key viewpoints that would most clearly display the visual effects of the project. Five key views were identified based on the types of project-related features that would be visible, the number and frequency of views, the designated scenic resources, and the potential sensitivity of viewers. The locations of the key views are shown in Figure 3.4-2.

Visual simulations were prepared to show an accurate digital simulation of the future development conditions for four of the key views. The simulations are not generalized artist renditions but were created through photographing the project site with high-resolution digital photography. The exact distances from the camera to points on the project site were recorded through the use of global positioning system (GPS) technology to achieve accuracy in the scale of future development. Computer imagery was then developed from details shown on the TM to place future homes in the appropriate locations and to provide accurate scale in the photos. Since development of the visual simulations, the project design has been modified slightly, but does not create noticeable changes within the simulations. The simulated homes in the photos are generalized representations of the anticipated design of the future residential construction, and are not meant to define the exact look of the individual homes on each lot.

Analysis of Key View 1

Key View 1 is the view from SR 67 near Carol Lane and represents the short-term view of the southeastern corner of Area A by passing northbound motorists. The view encompasses an undisturbed hill on the south side of Highland Valley Road, farmland that extends from SR 67 to the hill, and the knoll north of Highland Valley Road. Key View 1 toward the north is distinguished by the lack of structures and a sense of visual openness. The natural horizon is uninterrupted, providing a scenic panorama. Because SR 67 is a major transportation corridor,

vehicles traveling on the road are also a part of the visual landscape, as are street and informational signage and utility poles.

A visual simulation of the Cumming Ranch development was produced for Key View 1 to illustrate the future visual environment (Figure 3.4-3). The Cumming Ranch project would change the Key View 1 viewscape from natural and farmland-related open space to a rural residential development by introducing paved roads, one- and two-story houses on large lots, and native and ornamental landscaping. The Cumming Ranch project would result in a viewscape that is similar to existing residential development that generally surrounds Area A. In addition, as shown in the visual simulation (Figure 3.4-3), the high percentage of open space between the viewpoint and planned development minimizes the future view of residences. The use of native landscaping would allow the project to integrate more seamlessly with the surrounding areas. Therefore, the change in composition of the area's visual pattern would be compatible with the existing visual character in terms of dominance, scale, diversity, and continuity. From Key View 1, the change to the visual environment is not prominent in the viewscape of the passing northbound motorists, and most new features on the site can be seen only in the distance. Impacts to the community's visual character per Guideline 4 would be ***less than significant***.

Grading activities would be confined to construction of the internal roads and individual building pads. All of the residential lots were individually designed to follow the natural contours of the site to minimize grading and reduce artificial slopes. No mass grading would occur, and the maximum height of any artificial slope from this view would be approximately 6 feet, with a cut-and-fill slope ratio of 3:1 (3 horizontal to 1 vertical) necessary for road grading. The landform alteration associated with development of the Cumming Ranch project site would be a ***less-than-significant*** impact on visual resources per Guideline 2.

The introduction of paved surfaces and structures to the Key View 1 viewscape would result in a substantial change in the visual environment that includes existing scenic vistas of undisturbed ridgelines, large areas of open space, and other natural features. In addition, the site is visible from a locally designated scenic highway (SR 67). As shown in Key View 1, the change to the visual character that would result from implementation of the proposed project would not be prominent in the viewscape of the passing northbound motorists, and most new features on the site would be seen only in the distance. Physical features onsite such as trees and boulders would be incorporated into the residential lots' design. All of the major ridgelines, larger groups of rock outcroppings, heavily wooded areas, and major drainage areas on the property would be preserved and included within open space areas. The use of native plantings within the Landscape Concept Plan are intended to allow the project to integrate more seamlessly with the adjoining preserve areas. These and other features of the design further reduce the visual impacts

of the project, and views of the onsite scenic vistas from SR 67 would be maintained and not adversely affected as outlined in Guideline 1. Therefore, the resulting visual impacts would be ***less than significant***.

Analysis of Key View 2

Key View 2 is a view toward the southwest from SR 67 at its intersection with Highland Valley Road. This key view represents the short-term view from passing southbound motorists and encompasses the southern portion of the Cumming Ranch project site. Included in the foreground view are traffic light fixtures, an existing residence (left side of photograph), and open fields that are adjacent to the Cumming Ranch project site. The elevated hillside within the southern portion of the Cumming Ranch project site can be seen from this viewing location. This is the only area of the project site that is readily visible from SR 67. The segments of SR 67 to the north of Key View 2 and south of Key View 1 have limited to totally obstructed views of the site.

A visual simulation of the Cumming Ranch development was produced for Key View 2 to illustrate the future visual environment (Figure 3.4-4). The Cumming Ranch project would change the Key View 2 visual character to include rural residential from existing natural and farmland-related open space. The new roads, houses, and landscaping would alter the existing viewscape. The Cumming Ranch project would result in an appearance that is similar to existing surrounding residential development. All of the major ridgelines, larger groups of rock outcroppings, heavily wooded areas, and major swales on the property would be preserved and included in the open space areas. In addition, the intervening open space between the project and Key View 2 would reduce the visibility of the project. The use of native landscaping would allow the project to integrate more seamlessly with the surrounding area. Therefore, the change in composition of the area's visual pattern would be consistent with the existing visual character in terms of dominance, scale, diversity, and continuity. Impacts to the community's visual character per Guideline 4 would be ***less than significant***.

Grading activities would be necessary to construct internal roads and individual building pads. All of the residential lots were individually designed to follow the natural contours of the site and to minimize grading and reduce artificial slopes. No mass grading would occur, and the maximum height of any artificial slope from this view would be approximately 6 feet, with a cut-and-fill slope ratio of 3:1 (3 horizontal to 1 vertical) necessary for road grading. The landform alteration associated with development of the Cumming Ranch project site would result in a ***less-than-significant*** impact on visual resources per Guideline 2.

The introduction of paved surfaces and structures to the Key View 2 viewscape would result in a substantial change in the visual environment that includes existing scenic vistas of undisturbed ridgelines, large areas of open space, and other natural features. In addition, the site is visible from a locally designated scenic highway (SR 67). Residential development onsite would change the existing natural scenic vistas to views that include developed and built features. However, the high percentage of open space and the careful selection of lands included in open space would significantly reduce the visual impact from development. Physical features onsite, such as trees and boulders, would be incorporated into the individual residential lot design as a unique natural feature of each lot. The use of native plantings within the Landscape Concept Plan are intended to allow the project to integrate more seamlessly with the adjoining areas. Natural contours would be maintained, such as the hillside shown in the middle of the visual simulation, and views to distant mountainous areas would not be obscured. The other natural features of the site would also be preserved, and views of these scenic vistas from SR 67 would not be adversely affected. For these reasons, the change to the visual character that would result from implementation of the proposed project is a ***less-than-significant*** impact to visual resources per Guideline 1.

Analysis of Key View 3

Key View 3 is the view from Highland Valley Road, just west of Adrienne Way at the westernmost boundary of the Cumming Ranch project site. This key view represents the short-term view of the southern portion of the project site from passing eastbound motorists. The view includes Highland Valley Road, adjacent wire fences and utility poles, and farmland. Existing stands of oak trees are visible, as are a small hill in the middle ground (to the right) and a mountain in the background (to the left). Highland Valley Road is now a locally designated scenic highway (County of San Diego 2011). Although rural development is located adjacent to the Cumming Ranch project site immediately west of Key View 3, the view encompasses an open landscape characterized by nonnative grasses or crops with a natural horizon of trees and hillsides. Views of the project site from Highland Valley Road are considered scenic because of the open vistas, rolling countryside, and minimal presence of built features. A visual simulation of the Cumming Ranch development was produced for Key View 3 to illustrate the future visual environment (Figure 3.4-5). All residences have a 100-foot set back from the right-of-way to limit views from the road. The hill would remain a prominent feature, as the residential pads were individually designed to fit into the hillside with the least amount of grading possible. Proposed homes on the hillside would be visible from this key view. Although these lots encompass most of the hill, the developed parts of the lots are located within the southernmost portion of each lot, with open space between the homes and the roadway.

The Key View 3 viewscape would change from natural and farmland-related open space to a rural residential development with implementation of the Cumming Ranch project. All of the larger groups of rock outcroppings and major swales on this portion of the property would be preserved and included in the open space areas. Some open space areas would also be enhanced with additional native vegetation. Because the project would result in a viewscape that is similar to existing development in the immediate and surrounding area in terms of density and use, because the project is set back from public roadways which are the primary public views, and because there is existing development surrounding the project site, including the airport to the north and SR 67 to the south, the change to the area's visual pattern would be compatible with the existing visual character in terms of dominance, scale, diversity, and continuity. Based on Guideline 4, impacts to the community's visual character would be ***less than significant***.

Grading activities would be confined to the internal roads and individual building pads. No mass grading would occur. The residential lots were individually designed to follow the natural contours of the site to minimize grading and avoid artificial slopes. The maximum height of any artificial slope from this view would be approximately 18 feet, with a cut-and-fill slope ratio of 2:1 (2 horizontal to 1 vertical) within Lot 67. Much of the natural topography and vegetation would be retained within the open space lots. The landform alteration associated with development of the Cumming Ranch project site would be a ***less-than-significant*** impact on visual resources per Guideline 2.

The introduction of paved surfaces and residential structures to the Key View 3 viewscape would result in a change in the visual environment, which includes existing scenic vistas of undisturbed ridgelines, large areas of open space, and other natural features. However, visual resources from Highland Valley Road will remain scenic based on the fairly level terrain of the road and valley; the incorporation of trees and boulders into the design of the residential lots; the use of native plantings that would provide for the integration of the project with natural open space areas; the visual accessibility of open space lots from the road; and the required 100-foot setback that has been maintained from Highland Valley Road. For these reasons, the change to the visual character that would result from implementation of the proposed project would be a ***less-than-significant*** impact to visual resources per Guideline 1.

Analysis of Key View 4

Key View 4 is the view from Highland Valley Road approximately 1,300 feet east of the Key View 3 location. The view toward the east encompasses a portion of Area A north of Highland Valley Road. The view represents the short-term view of the site from passing eastbound motorists. Utility poles and fence posts are within this view, as are farmlands on rolling hills and

two onsite knolls. Views of the project site from the road are considered scenic because of the open vistas, rolling countryside, and minimal presence of built features.

A visual simulation of the Cumming Ranch development was produced for Key View 4 to illustrate the future visual environment (Figure 3.4-6). The Cumming Ranch project would change the Key View 4 vista from natural and farmland-related open space to a rural residential development by introducing paved roads, one- and two-story houses on estate lots, and native and ornamental landscaping. Large areas of open space would remain, and the proposed lot sizes would provide separation between individual homes. Some open space areas would also be enhanced with additional native vegetation. All of the major ridgelines, larger groups of rock outcroppings, heavily wooded areas, and major swales on the property would be preserved and included in the open space areas. The Cumming Ranch project would have a visual character that is similar to existing adjacent residential development. The change in composition of the area's visual pattern would be compatible with the existing visual character in terms of dominance, scale, diversity, and continuity. Impacts to the community's visual character would be ***less than significant*** per Guideline 4.

Grading activities would be confined to construction of the internal roads and individual building pads. The residential lots were individually designed to follow the natural contours of the site to minimize grading and avoid artificial slopes. No mass grading would occur, and the maximum height of any artificial slope from this view would be approximately 5 feet, with a cut-and-fill slope ratio of 3:1 (3 horizontal to 1 vertical) for lot pads. The central ridgeline would be retained within the largest open space lot, thereby preserving the natural horizon of the Cumming Ranch project site. The landform alteration resulting from development of the project site, visible from Key View 4, would be a ***less-than-significant*** impact on visual resources per Guideline 2.

The introduction of paved surfaces and structures to the Key View 4 viewscape would result in a change in the visual environment that includes views of undisturbed ridgelines, large areas of open space, and other natural features. However, the physical features onsite, such as trees and boulders, would be incorporated into the residential lot design as an amenity and visual feature. The dominant topographical feature, the central ridgeline, would be preserved. The view of this ridgeline would be slightly obscured at some points as motorists travel on Highland Valley Road, similar to the visual simulation. The use of native plantings would provide for the integration of the project with the preserved natural open space areas. The large amount of open space and lack of fencing throughout the development area would further maintain the rural feel and aesthetic of the project site. The features that comprise the existing scenic vistas, such as the rocky center ridgeline, would not be adversely affected. For these reasons, the change to the visual character

that would result from implementation of the proposed project would be a ***less-than-significant*** impact to visual resources per Guideline 1.

Analysis of Key View 5

Key View 5 is the view from a dirt road along the northern border of Area A and represents the view of the northern portion of Area A from hikers and equestrians on the future trail system. A representative photograph of this view is shown in Figure 3.4-7. The view to the southwest includes an intermittent creek, located offsite; a cluster of rock outcroppings; utility poles; and the ridgeline. There is relatively little development in the vicinity of Key View 5, except for several single-family homes to the west with yards that front on the north side of Voorhes Lane. A grove of trees is located immediately north of the viewpoint, a portion of which can be seen in the photograph in Figure 3.4-7.

Development of the Cumming Ranch project site in the northern portion of Area A would result in a change to the visual environment, as shown in Figure 3.4-7. Based on the topography and horizontal angle of observation, only four houses (Lots 110, 111, 124, and 125) would be visible from this view point. These lots were designed with the residential pad area located in the northern portion of the lots at the base of the hill. This would minimize encroachment into the hillside and reduce the amount of ground disturbance necessary to construct a level building pad. The design would leave the majority of the upland areas within the lots undeveloped and in a natural state. From Key View 5, the above-mentioned four homes at the base of the hillside would be visible, but the majority of the knolls would remain undeveloped, even though the area would technically be within a private lot. Houses to be constructed to the north and east of the smaller knoll would not be seen due to the intervening topography and rock outcroppings.

The lift station required for the project would be visible from the Key View 5 area and would be enclosed with a natural façade required as noise mitigation. The visual impacts from the lift station and enclosure are discussed below in the Analysis of Noise Mitigation Requirements section. The majority of the viewscape would be preserved in the uphill portions of the lots, which would integrate with the large open space lot that encompasses both of the knolls.

The addition of four homes in the distance, set on large lots, would not significantly affect the overall enjoyment of hikers and equestrians, who are considered sensitive viewers from Key View 5. Through the preservation of the majority of the main ridgeline, which is the main feature from this key view, there would be little change in composition of the area's visual pattern with the existing visual character in terms of dominance, scale, diversity, and continuity. Impacts to the community's visual character would be ***less than significant*** per Guideline 4.

Grading activities would be confined to the home sites and the looped roadway. Minimal grading for underground utilities would occur within the open space lot. This area would be hydroseeded with native vegetation subsequent to the grading activities. The landform alteration associated with development of the Cumming Ranch project site visible from the Key View 5 location would not have a significant impact on existing onsite visual resources and quality. The major topographic feature visible from the trail, the central ridgeline as shown in the center of the photo in Figure 3.4-7, would remain undeveloped and preserved in open space. The maximum height of any artificial slope from this view would be approximately 26 feet, with a cut-and-fill slope ratio of 1.5:1 (1.5 horizontal to 1 vertical) for the roadway located along the bottom of the northeast side of the main ridgeline. The road and residential lots that partially encroach into the hillsides were designed at lower elevations to minimize the visual disturbance. The visual impact that would result with implementation of the project from Key View 5 would be ***less than significant*** per Guideline 2.

Construction-Related Visual Effects

During the construction phase of the project, the presence of clearing and grading equipment and vehicles may be evident to area residents and motorists. There could be storage of construction equipment and vehicles, and stockpiles of road materials. The combination of necessary construction activities, equipment storage, and stockpiled construction materials could create short-term, negative visual impacts. These impacts would be ***less than significant*** according to Guidelines 1, 2, and 4 because construction-related impacts would be temporary, would move throughout the project site based on where construction activities were ongoing, and would not be inconsistent with the rural landscape.

Light and Glare and Dark Skies

No street lighting is proposed for the Cumming Ranch project on internal roads, Highland Valley Road, or SR 67. Lighting may be incorporated at each of the four project entrance roads for visibility and the safety of turning vehicles, and at each home for security or landscape lighting. Light sources from Cumming Ranch would not adversely affect nighttime views or astronomical observations, because the project would conform to Zone B restrictions in the Light Pollution Code (County Code Section 51.201-51.209). The restrictions specify the Zone B lamp type and shielding requirements per fixture and hours of operation limitations for outdoor lighting. The Light Pollution Code addresses and minimizes the impact of new outdoor light sources at the building permit stage by regulating light spillover and intensity. No structures are proposed for the Cumming Ranch project that would create glare from reflective materials. There would be a

less-than-significant impact resulting from light and glare and a ***less-than-significant*** impact to dark skies according to Guideline 3.

Noise Mitigation Requirements

The noise analysis for the Cumming Ranch project determined that 22 residences located along Highland Valley Road and SR 67 would have potentially significant noise impacts requiring mitigation. To mitigate the noise impacts, a noise protection easement would be required. To verify the feasibility of the noise-reduction required in the noise protection easement, conceptual residences and individual noise barriers were modeled for each of the 22 impacted lots. The noise analysis provides potential concepts for the shape and location of the required sound barriers around the backyard of each impacted residence. It is assumed that the barriers would typically be L-shaped or U-shaped to partially shield the backyard area. Conceptual modeling showed that to achieve the required reduction in noise levels, the barriers would need to range from 6 to 10 feet high and be constructed of a solid material with no gaps or spacing within the barrier. To keep with community character and scenic views, the noise protection easement would restrict solid (opaque) barrier height to 6 feet or less (restrictions specified in Noise **Mitigation Measure M-N-5**). The barrier heights and locations were based on simplified site design and conservative modeling assumptions for the feasibility analysis, and should not be considered the final design. The provision of noise barriers within the private properties would result in the avoidance of a long continuous wall along the roadway edge, which would be visually undesirable.

These noise barriers would serve to attenuate noise to the residential backyards from the roadways, either Highland Valley Road or SR 67. Therefore, where the location of the barriers is between the residences and the roadways they may be visible to passing motorists. Visually, the barriers would not appear as large obstructions in open areas, as they would be closely associated with each of the affected residences. Six-foot-high solid barriers would not be tall enough to block distant views or the natural features of the project site, especially in consideration of their proximity to taller residential structures. The barriers would enclose only the NSLUs (effectively, the exterior use areas) of the homes, as required by County policy, and would not encompass the entire lot or expand continuously across multiple lots.

Although the noise barriers would be associated with individual homes and would not be overly large in scale, the presence of solid walls or barriers, in association with the existing and proposed rural residential environment could result in ***significant visual impacts*** per Guideline 4 (**Impact AE-1**).

During construction of the project's internal roadway network, a temporary noise wall would be required to lower noise levels at an existing residence located to the southeast of the project site. This wall would be 14 feet high and 420 feet in length. The height of this temporary noise wall would be intrusive to the existing visual environment; however, the wall would only be necessary during construction of the roadway in this specific area of the project site. Because this wall would be temporary (approximately 90 days) and viewed primarily from a distance (about 1,000 feet from the SR 67/Highland Valley Road intersection), this visual impact is considered ***less than significant*** per Guideline 4.

To reduce noise generated by the onsite sewer lift station, the project proposes to enclose the lift station equipment and use a natural-looking façade for that enclosure. Because lift station equipment specifications are not available, the exact enclosure dimensions and need for additional measures such as walls or berms has not been fully determined. The lift station is located in a low-lying area on the north side of the main ridgeline in Area A. The lift station would be visible to future trail users, approximately three future project residences, motorists on the internal looped project roadway, and potentially one existing home on Voorhes Lane. Although exact specifications of the enclosure are not known, the above-ground components of the lift station would be minimal and relatively low to the ground, likely a 3- to 4-foot maximum height. Rather than having an industrial look, a natural façade such as rock, stone, or other natural-looking material would be used. The natural façade combined with the low height of the required enclosure would help this visual element to more naturally blend into the surrounding area. The minimal size and visibility of this element would result in a ***less-than-significant*** visual impact per Guideline 4. Project design features would be required through the Minor Use Permit for the facility.

3.4.4 Cumulative Impact Analysis

The Cumming Ranch project site is located in a rural area of the County that is primarily surrounded by residential development with large areas of open space to the northwest and smaller parcels of open space to the southeast. The Cumming Ranch project is one of multiple different proposed projects throughout the Ramona Community Planning Area that are planning residential development in currently undeveloped areas. For this cumulative study, the study area extends out to approximately the project's viewshed and out approximately 1 mile along the major roads used by the project. Within this study area, the cumulative projects include two airport projects, two church projects, four parcel maps, two TMs, and three agricultural permits (numbers 2, 6, 10, 11, 17, 30, 43, 47, 64, 66, 76, and 80.

The proposed Cumming Ranch rural residential development is consistent with the adjacent viewscape, since existing residential lots are generally located along the north, west, and south boundaries of Area A. Many of the projects in the immediate area of the Cumming Ranch site are minor subdivisions of existing lots for residential homes. These projects are consistent with the existing development in the area and would not significantly alter the visual environment. Due to the large lot sizes and unique placement of each lot, rather than a tract-style development, the Cumming Ranch project is visually compatible with existing and future developments in the immediate area.

The Cumming Ranch project would incrementally add to the trend of developing rural areas of Ramona with residential uses, in particular, uses along major roads in Ramona. However, preservation of large tracks of open space would also preserve the overall visual environment. This project was designed to seamlessly integrate with the surrounding environment. All of the major ridgelines, larger groups of rock outcroppings, heavily wooded areas, and major drainage areas on the property would be preserved and included within open space areas. Of the development area of the project, Area A, 143.7 acres of the 358.7 acres would be preserved as open space. Another 314.1 acres in Areas B and C would be designated as open space. Many of the larger development projects on the cumulative project list also include large percentages of onsite open space, such as the Oak County Estates project (more than 500 acres of open space) and the Montecito Ranch project (almost 600 acres). The designs of these larger projects help to visually maintain the feel of open space and rural character throughout Ramona.

As described above, the majority of the cumulative projects within the project viewshed are new residential developments on subdivided lots or expansions of existing developments, such as church facilities or airfield expansions. Although these projects would add to the trend of development within the project viewshed, the type of development, including rural residential, church facilities, and airfield operations, are already present within the local area. The aesthetic change resulting from the new cumulative development would be compatible and typical within the existing visual environment. Development in the Ramona area is regulated through the zoning codes and Community Plan requirements, which require large residential lot sizes and help to ensure that the rural visual character of the area is maintained as the area continues to grow. Development proposed in the cumulative study area would be subject to these regulations and requirements. The Cumming Ranch project was designed to follow the natural contours of the site, and minimal grading would occur, thus maintaining the natural topography and reducing the visual impact of the residential development. These and other design features ensure that the project would visually integrate with the existing Ramona ambience and surrounding natural areas. For these reasons, the project's incremental changes to the visual character of the area are

not cumulatively considerable. Therefore, there is ***no cumulative impact*** to visual resources based on Guideline 5.

3.4.5 Mitigation Measures

<u>Mitigation Measure M-AE-1</u> Visual Appearance of Noise Barriers

The Noise Restriction Easement requires that the overall look of the required noise barriers at each of the 22 noise-impacted residences adhere to the following design measures to ensure that the noise barriers complement the natural setting and overall design of the Cumming Ranch project and surrounding community character. Measures include:

a. Barriers shall be constructed of natural-looking materials that complement the surrounding rural landscape. Materials such as stone, stone veneer, boulders, and stucco are all acceptable materials.

b. The use of plexi-glass or other translucent materials shall be allowed.

c. The color palette for the barriers shall be consistent with the adjacent rural landscape and consist of earth-toned hues.

d. A minimum of a 5-foot-wide landscape buffer shall be required along the exterior base of barriers. All landscape material in this area shall be native and as defined in the Landscape Concept Plan.

e. Earth berms or earth berm/wall combination are other acceptable forms of noise mitigation. Berms shall have a maximum of 1.5:1 slope. If a berm is used, it shall be natural in appearance and reflect the aesthetic of the surrounding rural landscape. Berm plantings shall be consistent with the Landscape Concept Plan.

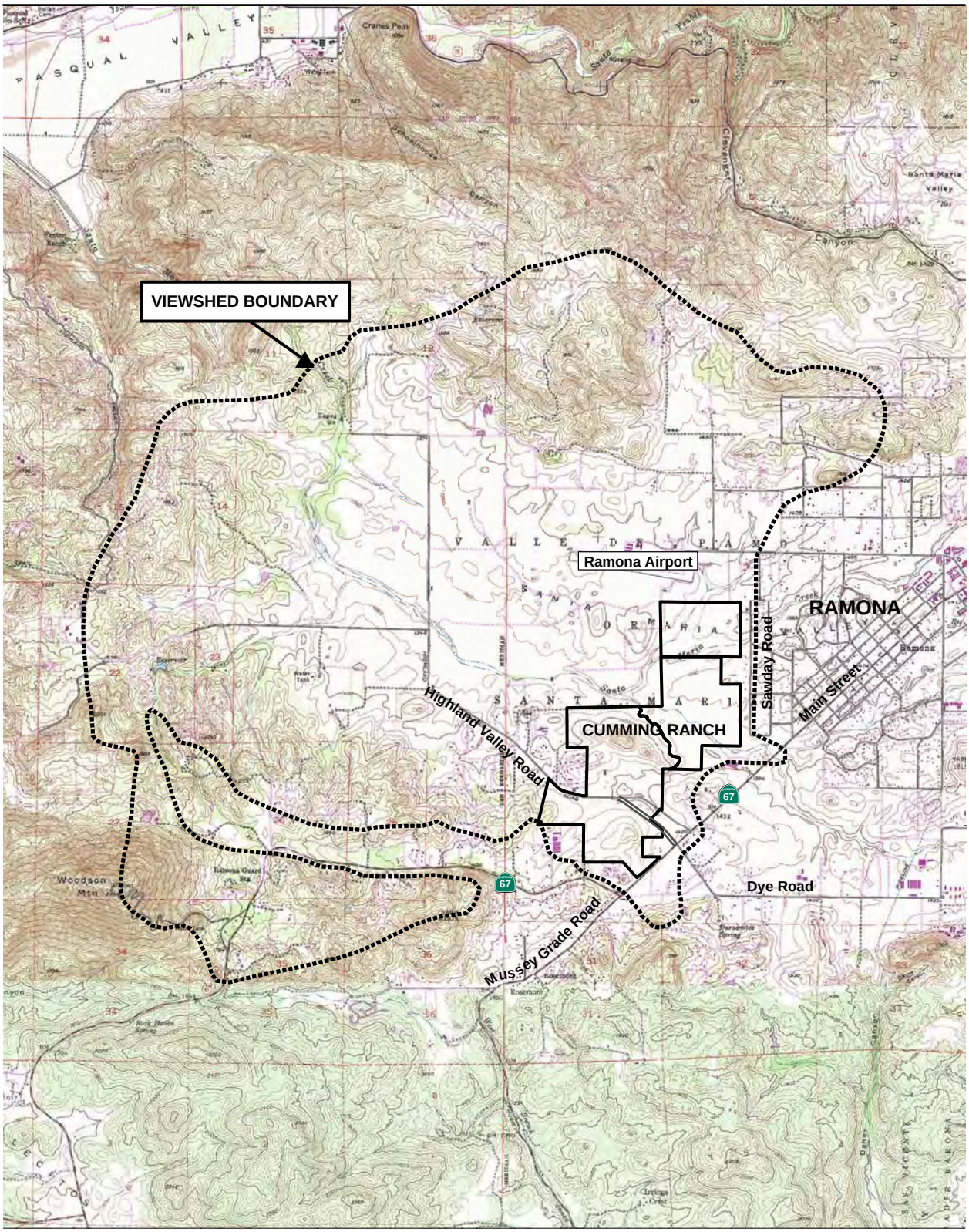
f. Wall portions of the barrier shall not exceed 6 feet.

The use of natural materials on the wall facades to complement the open rural setting would reduce the intrusiveness of the walls and unite the walls with the overall design of the proposed project. Landscaping along the exterior base of the walls would partially conceal the walls as well as blend and soften the hard lines of the walls with the open surroundings. The use of plexi-glass or other transparent material would reduce the visibility of the walls, while still maintaining the appropriate noise reduction. These measures shall be imposed upon the project by the Noise Restriction Easement.

3.4.6 Conclusions

The homes and internal roadways of the Cumming Ranch project would be visually consistent with that of the surrounding area. Implementation of the project would create a change in the visual environment of the project site; however, through features of the project such as minimal grading, maintaining natural features (ridgelines, hilltops, boulders, and oak trees), natural landscaping, large open space areas, and other design measures, impacts to the visual character of the area would be minimized, and the resulting visual impact would be ***less than significant***.

Mitigation Measure **M-AE-1a-f**, required for the noise barriers, would reduce the potential visual impact of the walls (**Impact AE-1)** to less than significant because walls would be limited in height and use of natural-looking materials and natural landscaping would be required. With incorporation of this mitigation measure, the individual noise barriers would be designed to be aesthetically pleasing and blend as naturally as possible with the proposed development and surrounding open space, reducing the impact to ***less than significant***.



Source: USGS, San Pasqual and San Vicente Reservoir Quad; SanGIS, 2003

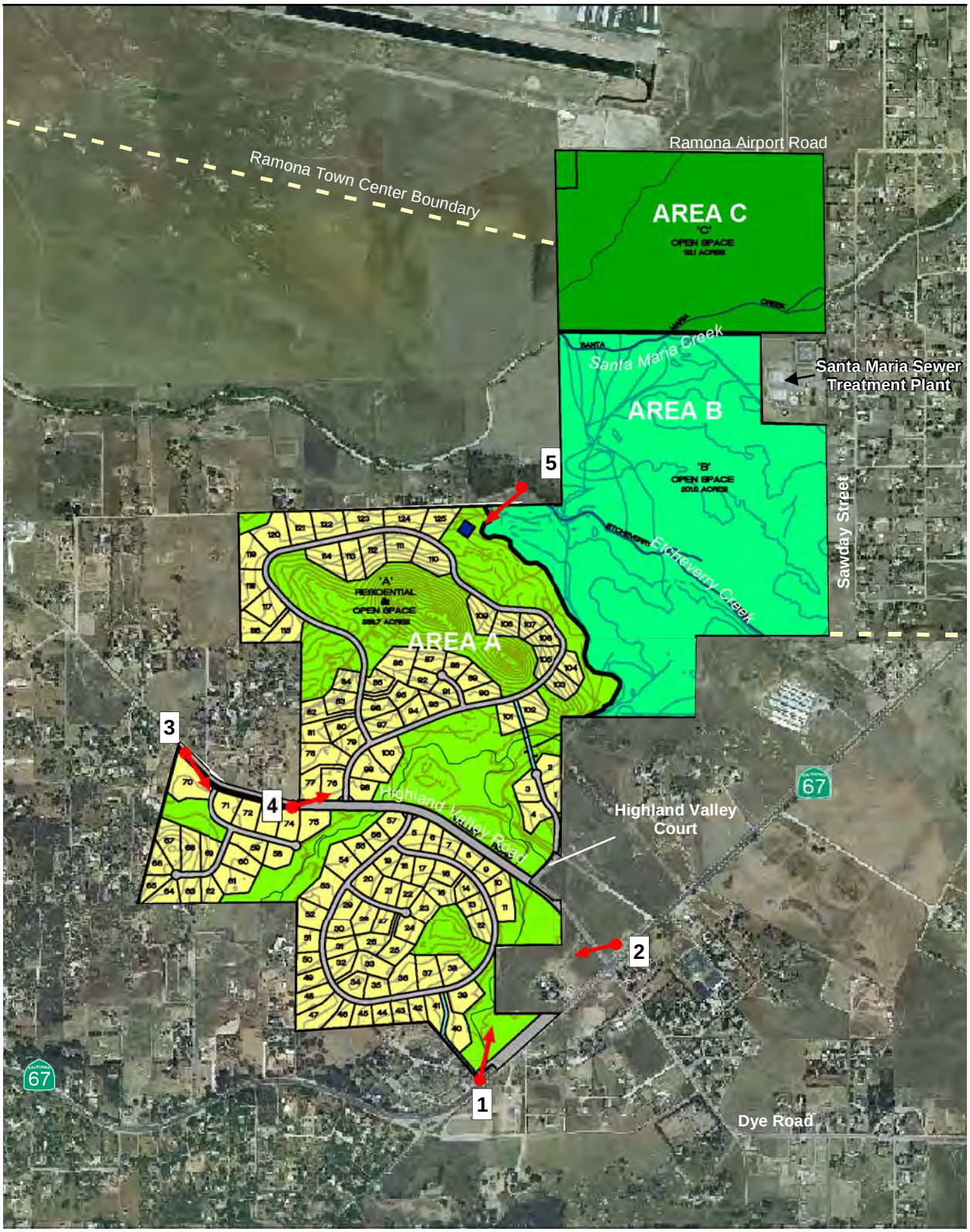
NORTH

5000 2500 0 5000 Feet

Scale: 1:60,000; 1 inch = 5,000 feet

Figure 3.4-1
Project Viewshed

P:\2008\08080045 Cumming Ranch\6Graphics\Figures\4th Iteration EIR\Figure 3.4-1 project viewshed.ai dbrady 1/8/13



Source: Eagle Aerial 2002; SanGIS, 2003

NORTH

1500 750 0 1500 Feet

Scale: 1:18,000; 1 inch = 1,500 feet

Figure 3.4-2
Key View Locations

Existing View looking north from SR 67.

Visual Simulation of Future Development; looking toward Lots 39, 12, and 11.

Figure 3.4-3
Key View 1

Existing View looking southwest from SR 67 at Highland Valley Road.

Visual Simulation of Future Development; looking toward Lots 12, 38, 39,40, and 41.

Figure 3.4-4
Key View 2

Existing View looking southeast from Highland Valley Road.

Visual Simulation of Future Development; looking towards Lots 59, 66, 67, 68, 70, 71, 72, and 73.

Figure 3.4-5
Key View 3

Existing View looking northeast from Highland Valley Road.

Visual Simulation of Future Development; looking toward Lots 76, 77, 78, 98, 99, and 100.

Figure 3.4-6
Key View 4

Existing Conditions looking southwest from existing dirt road and location of future trail.

Visual Simulation of Future Development; looking towards lots 110, 111, 124, and 125.

Figure 3.4-7
Key View 5

P:\2008\08080045 Cumming Ranch\6Graphics\Figures\Visual Resources/Figure 15 Key View 5.ai (dbrady) *1/8/13*

Table 3.4-1
Viewer Response Summary

Viewer Group	Sensitivity	Quantity	Distance*	Duration
Motorists	Moderate–High	High	Foreground	Short-term
Residents	Moderate	Moderate	Foreground – Far Ground	Long-term
Recreationalists	High	Low	Foreground	Short-term
Workers and Patrons	Low	Low	Foreground	Moderate

* Foreground = 0 to 0.25 mile; Middle Ground = 0.25 to 3 miles; Far Ground = 3 miles or more

3.5 Global Climate Change

CEQA requires that lead agencies consider the reasonably foreseeable adverse environmental effects of projects they are considering for approval. Greenhouse gas (GHG) emissions have the potential to adversely affect the environment because they contribute, on a cumulative basis, to global climate change. In turn, global climate change has the potential to result in rising sea levels, which can inundate low-lying areas; to affect rain and snow fall, leading to changes in water supply; and to affect habitat, leading to adverse effects on biological and other resources, and to increase wildfires. Thus, GHG emissions require consideration in CEQA documents.

3.5.1 Existing Conditions

Existing Climate

Climate is the accumulation of daily and seasonal weather events over a long period of time, whereas weather is the condition of the atmosphere at any particular time and place (Ahrens 2003). The proposed project is located in the San Diego County Air Basin (SDAB), which experiences a Mediterranean climate. The climate is characterized by warm, dry summers and mild, rainy winters, and low annual rainfall.

Local climate of the project site is represented by measurements recorded at the El Capitan Dam station, which is located approximately 10 miles to the southeast of the project site. Typical annual precipitation, which occurs primarily November through March, is approximately 16 inches. January temperatures range from a normal minimum of 41°F to a normal maximum of 69°F. July temperatures range from a normal minimum of 58°F to a normal maximum of 93°F (NOAA 1992). The predominant wind direction and speed, which is represented by measurements at the Miramar station, located approximately 15 miles to the southwest of the project site, is from the west-northwest at 7 miles per hour (mph) (CARB 1994).

Physical Scientific Basis of Climate Change

Certain gases in the Earth's atmosphere, classified as GHGs, play a critical role in determining the Earth's surface temperature. Solar radiation enters Earth's atmosphere from space. A portion of the radiation is absorbed by Earth's surface, and a smaller portion of this radiation is reflected back toward space. This absorbed radiation is then emitted from the Earth as low-frequency infrared radiation. The frequencies at which bodies emit radiation are proportional to temperature. The Earth has a much lower temperature than the sun; therefore, the Earth emits lower frequency radiation. Most solar radiation passes through GHGs; however, infrared

radiation is absorbed by these gases. As a result, radiation that otherwise would have escaped back into space is instead "trapped," resulting in a warming of the atmosphere. This phenomenon, known as the greenhouse effect, is responsible for maintaining a habitable climate on Earth. Without the greenhouse effect, Earth would not be able to support life as we know it.

Prominent GHGs contributing to the greenhouse effect are carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFCs), chlorofluorocarbons (CFCs), and sulfur hexafluoride (SF_6). Human-caused emissions of these GHGs in excess of natural ambient concentrations are responsible for intensifying the greenhouse effect and have led to a trend of unnatural warming of the Earth's climate, known as global climate change or global warming. It is extremely unlikely that global climate change of the past 50 years can be explained without contribution from human activities (IPCC 2007).

Climate change is a global problem. GHGs are global pollutants, unlike criteria air pollutants and toxic air contaminants (TACs), which are pollutants of regional and local concern. Whereas pollutants with localized air quality effects have relatively short atmospheric lifetimes (about 1 day), GHGs have long atmospheric lifetimes (1 year to several thousand years). GHGs persist in the atmosphere for long enough time periods to be dispersed around the globe. Although the exact lifetime of any particular GHG molecule is dependent on multiple variables and cannot be pinpointed, it is understood that more CO_2 is emitted into the atmosphere than is sequestered by ocean uptake, vegetation, and other forms of sequestration. Of the total annual human-caused CO_2 emissions, approximately 54% is sequestered through ocean uptake and uptake by northern hemisphere forest regrowth and other terrestrial sinks, whereas the remaining 46% of human-caused CO_2 emissions remains stored in the atmosphere (Seinfeld and Pandis 1998).

Similarly, impacts of GHGs are borne globally, as opposed to localized air quality effects of criteria air pollutants and TACs. The quantity of GHGs that it takes to ultimately result in climate change is not precisely known; suffice it to say, the quantity is enormous, and no single project alone would measurably contribute to a noticeable incremental change in the global average temperature or to global, local, or micro climates. From the standpoint of CEQA, GHG impacts to global climate change are inherently cumulative.

Greenhouse Gas Emission Sources

Emissions of GHGs contributing to global climate change are attributable in large part to human activities associated with the transportation, industrial/manufacturing, electric utility, residential, commercial, and agricultural sectors (CARB 2009a). In California, the transportation sector is the largest emitter of GHGs, followed by electricity generation (CARB 2009a). Emissions of

CO_2 are byproducts of fossil fuel combustion. CH_4, a highly potent GHG, results from off-gassing (the release of chemicals from nonmetallic substances under ambient or greater pressure conditions) largely associated with agricultural practices and landfills. N_2O is also largely attributable to agricultural practices and soil management. CO_2 sinks, or reservoirs, include vegetation and the ocean, which absorb CO_2 through sequestration and dissolution, respectively, two of the most common processes of CO_2 sequestration.

California is in the top-20 of global emitters of CO_2 (CEC 2006a). California produced 484 million gross metric tons of CO_2 equivalent (CO_2e) in 2004 (CARB 2009a). CO_2e is a measurement used to account for the fact that different GHGs have different potential to retain infrared radiation in the atmosphere and contribute to the greenhouse effect. This potential, known as the global warming potential of a GHG, is dependent on the lifetime, or persistence, of the gas molecule in the atmosphere. Expressing emissions in CO_2e takes the contributions of GHG emissions to the greenhouse effect and converts them to a single unit, equivalent to the effect that would occur if only CO_2 were being emitted.

Combustion of fossil fuel in the transportation sector was the single largest source of California's GHG emissions in 2004, accounting for 38% of total GHG emissions in the state. This sector was followed by the electric power sector (including both in-state and out-of-state sources) (22%) and the industrial sector (20%) (CARB 2008).

Adaptation to Climate Change

According to the Intergovernmental Panel on Climate Change, which was established in 1988 by the World Meteorological Organization and the United Nations Environment Programme, global average temperature is expected to increase by 3°F to 7°F by the end of the century, depending on future GHG emissions scenarios (IPCC 2007). Resource areas other than air quality and global average temperature could be indirectly affected by the accumulation of GHG emissions. For example, an increase in the global average temperature is expected to result in a decreased volume of precipitation falling as snow in California and an overall reduction in snowpack in the Sierra Nevada Mountains. Snowpack in the Sierra Nevada provides both water supply (runoff) and storage (within the snowpack before melting), which is a major source of supply for the state (including the project site). According to the California Energy Commission (CEC), the snowpack portion of the water supply could potentially decline by 30% to 90% by the end of the 21st century (CEC 2006b). A study cited in a report by the California Department of Water Resources (DWR) projects that approximately 50% of the statewide snowpack will be lost by the end of the century (Knowles and Cayan 2002). Although current forecasts are uncertain, it is evident that this phenomenon could lead to significant challenges in securing an adequate water

supply for a growing population. An increase in precipitation falling as rain rather than snow also could lead to increased potential for floods because water that would normally be held in the Sierra Nevada until spring could flow into the Central Valley concurrently with winter storm events. This scenario would place more pressure on California's levee/flood control system (DWR 2006). Less snowpack and more runoff would result in drier vegetation which would contribute to spread and intensity of wildfire (Subchapter 4.1.2.1).

Another outcome of global climate change is sea level rise. Sea level rose approximately 7 inches during the last century, and it is predicted to rise an additional 7 to 22 inches by 2100, depending on the future levels of GHG emissions (IPCC 2007). If this occurs, resultant effects could include increased coastal flooding, saltwater intrusion, and disruption of wetlands (CEC 2006b). As the existing climate throughout California changes over time, the ranges of various plant and wildlife species could shift or be reduced, depending on the favored temperature and moisture regimes of each species. In the worst cases, some species would become extinct or be extirpated from the state if suitable conditions are no longer available.

The project site is situated approximately 1,500 feet above sea level and, thus, would not be directly affected by the potential sea level rise predicted to occur over the next 100 years.

Regulatory Setting

Federal Plans, Policies, Regulations, and Laws

USEPA is the federal agency responsible for implementing the Federal Clean Air Act (CAA). The Supreme Court of the United States ruled on April 2, 2007, that CO_2 is an air pollutant as defined under the CAA, and that USEPA has the authority to regulate emissions of GHGs. However, there are no federal regulations or policies regarding GHG emissions applicable to the proposed project at the time of this writing.

Mandatory Greenhouse Gas Reporting Rule

On September 22, 2009, USEPA issued a final rule for mandatory reporting of GHGs from large GHG emissions sources in the United States. In general, this national reporting requirement will provide USEPA with accurate and timely GHG emissions data from facilities that emit 25,000 metric tons or more of CO_2 per year. This publically available data will allow the reporters to track their own emissions, compare them to similar facilities, and identify cost-effective opportunities to reduce emissions in the future. Reporting is at the facility level, except that certain suppliers of fossil fuels and industrial GHGs, and vehicle and engine manufacturers will

report at the corporate level. An estimated 85% of the total U.S. GHG emissions, from approximately 10,000 facilities, are covered by this final rule.

Proposed Endangerment and Cause or Contribute Findings for Greenhouse Gases under the Clean Air Act

On April 23, 2009, USEPA published its Proposed Endangerment and Cause or Contribute Findings for Greenhouse Gases under the CAA (Endangerment Finding) in the Federal Register. The Endangerment Finding is based on Section 202(a) of the CAA, which states that the administrator of USEPA should regulate and develop standards for "emission[s] of air pollution from any class or classes of new motor vehicles or new motor vehicle engines, which, in [its] judgment, cause or contribute to air pollution [that] may reasonably be anticipated to endanger public health or welfare." The proposed rule addresses Section 202(a) in two distinct findings. The first addresses whether or not the concentrations of the six key GHGs (i.e., CO_2, CH_4, N_2O, HFCs, PFCs, and SF_6) in the atmosphere threaten the public health and welfare of current and future generations. The second addresses whether or not the combined emissions of GHGs from new motor vehicles and motor vehicle engines contribute to atmospheric concentrations of GHGs and, therefore, the threat of climate change.

The administrator of USEPA proposed the finding that atmospheric concentrations of GHGs endanger the public health and welfare within the meaning of Section 202(a) of the CAA. The evidence supporting this finding consists of human activity resulting in "high atmospheric levels" of GHG emissions, which are very likely responsible for increases in average temperatures and other climatic changes. Furthermore, the observed and projected results of climate change (e.g., higher likelihood of heat waves, wild fires, droughts, sea level rise, higher intensity storms) are a threat to the public health and welfare. Therefore, GHGs were found to endanger the public health and welfare of current and future generations.

The administrator of USEPA also proposed the finding that GHG emissions from new motor vehicles and motor vehicle engines are contributing to air pollution, which is endangering public health and welfare. The proposed finding cites that, in 2006, motor vehicles were the second largest contributor to domestic GHG emissions (24% of total), behind electricity generation. Furthermore, in 2005, the U.S. was responsible for 18% of global GHG emissions. Therefore, GHG emissions from motor vehicles and motor vehicle engines were found to contribute to air pollution that endangers public health and welfare.

State Plans, Policies, Regulations, and Laws

The California Air Resources Board (CARB) is the agency responsible for coordination and oversight of state and local air pollution control programs in California, and for implementing the California Clean Air Act, which was adopted in 1988.

Various statewide and local initiatives to reduce the state's contribution to GHG emissions have raised awareness that, even though the various contributors to and consequences of global climate change are not yet fully understood, global climate change is under way, and there is a real potential for severe adverse environmental, social, and economic effects in the long term. Because every nation emits GHGs and, therefore, makes an incremental cumulative contribution to global climate change, cooperation on a global scale is required to reduce the rate of GHG generation to a level that can help to slow or stop the human-caused increase in average global temperatures and associated changes in climatic conditions.

Assembly Bill 1493

In 2002, then-Governor Gray Davis signed Assembly Bill (AB) 1493. AB 1493 requires that CARB develop and adopt, by January 1, 2005, regulations that achieve "the maximum feasible reduction of greenhouse gases emitted by passenger vehicles and light-duty trucks and other vehicles determined by CARB to be vehicles whose primary use is noncommercial personal transportation in the state."

To meet the requirements of AB 1493, in 2004, CARB approved amendments to the California Code of Regulations (CCR), adding GHG emissions standards to California's existing standards for motor vehicle emissions. Amendments to CCR Title 13, Sections 1900 and 1961 (13 CCR 1900, 1961), and adoption of Section 1961.1 (13 CCR 1961.1) require automobile manufacturers to meet fleet-average GHG emissions limits for all passenger cars, light-duty trucks within various weight criteria, and medium-duty passenger vehicle weight classes (i.e., any medium-duty vehicle with a gross vehicle weight rating less than 10,000 pounds that is designed primarily for the transportation of persons), beginning with the 2009 model year. For passenger cars and light-duty trucks with a loaded vehicle weight of 3,750 pounds or less, the GHG emission limits for the 2016 model year are approximately 37% lower than the limits for the first year of the regulations, the 2009 model year. For light-duty trucks with a loaded vehicle weight of 3,751 pounds to gross vehicle weight of 8,500 pounds, as well as medium-duty passenger vehicles, GHG emissions would be reduced by approximately 24% between 2009 and 2016.

In December 2004, a group of car dealerships, automobile manufacturers, and trade groups representing automobile manufacturers filed suit against CARB to prevent enforcement of 13 CCR Sections 1900 and 1961 as amended by AB 1493 and 13 CCR 1961.1 (*Central Valley Chrysler-Jeep et al. v. Catherine E. Witherspoon, in Her Official Capacity as Executive Director of the California Air Resources Board, et al.*). The auto-makers' suit in the U.S. District Court for the Eastern District of California contended that California's implementation of regulations that, in effect, regulate vehicle fuel economy, violates various federal laws, regulations, and policies.

On December 12, 2007, the U.S. District Court found that if California receives appropriate authorization from USEPA (the last remaining factor in enforcing the standard), these regulations would be consistent with and have the force of federal law, thus, rejecting the automakers' claim. This authorization to implement more stringent standards in California was requested in the form of a CAA Section 209, subsection (b) waiver in 2005. USEPA failed to act on granting California authorization to implement the standards. Then-Governor Arnold Schwarzenegger and Attorney General Edmund G. Brown filed suit against USEPA for the delay. In December 2007, USEPA administrator Stephen Johnson denied California's request for the waiver to implement AB 1493. Johnson cited the need for a national approach to reducing GHG emissions, the lack of a "need to meet compelling and extraordinary conditions," and the emissions reductions that would be achieved through the Energy Independence and Security Act of 2007 as the reasoning for the denial (Office of the White House 2009).

The state of California filed suit against USEPA for its decision to deny the CAA waiver. The recent change in administration directed USEPA to reexamine its position for denial of California's CAA waiver and for its past opposition to GHG emissions regulation. California received the waiver on June 30, 2009.

The federal government increased the federal Corporate Average Fuel Efficiency standards for fuel economy in 2009 from the 2004 fleet (passenger cars and light-duty trucks) average of 25 to 35.5 miles per gallon by 2016, starting with the 2012 models. The 2020 level represents a 40% increase in fuel efficiency from the 2004 standard. The federal government is expected to adopt the Pavley standards with agreement from California not to toughen its standards before 2017.

Executive Order S-3-05

Executive Order S-3-05, which was signed by then-Governor Schwarzenegger in 2005, proclaimed that California is vulnerable to the impacts of climate change. It declared that increased temperatures could reduce the Sierra Nevada's snowpack, further exacerbate

California's air quality problems, and potentially cause a rise in sea levels. To combat those concerns, the Executive Order established total GHG emissions targets. Specifically, emissions are to be reduced to the 2000 level by 2010, the 1990 level by 2020, and to 80% below the 1990 level by 2050.

The Executive Order directed the secretary of the California Environmental Protection Agency (CalEPA) to coordinate a multi-agency effort to reduce GHG emissions to the target levels. The secretary of CalEPA is also directed to submit biannual reports to the governor and state legislature describing the progress made toward reaching the emissions targets, the impacts of global warming on California's resources, and mitigation and adaptation plans to combat these impacts. To comply with the Executive Order, the secretary of CalEPA created the California Climate Action Team, made up of members from various state agencies and commissions. The California Climate Action Team released its first report in March 2006. The report proposed to achieve the targets by building on voluntary actions of California businesses, through local government and community actions, and through state incentive and regulatory programs.

Assembly Bill 32, the California Global Warming Solutions Act of 2006

In September 2006, then-Governor Schwarzenegger signed AB 32, the California Global Warming Solutions Act of 2006. AB 32 establishes regulatory, reporting, and market mechanisms to achieve quantifiable reductions in GHG emissions and a cap on statewide GHG emissions. AB 32 requires that statewide GHG emissions be reduced to 1990 levels by 2020. This reduction will be accomplished through an enforceable statewide cap on GHG emissions that will be phased in starting in 2012. To effectively implement the cap, AB 32 directs CARB to develop and implement regulations to reduce statewide GHG emissions from stationary sources. AB 32 specifies that regulations adopted in response to AB 1493 should be used to address GHG emissions from vehicles. However, AB 32 also includes language stating that if AB 1493 regulations cannot be implemented, then CARB should develop new regulations to control vehicle GHG emissions under the authorization of AB 32.

AB 32 requires that CARB adopt a quantified cap on GHG emissions representing 1990 emissions levels and disclose how it arrives at the cap; institute a schedule to meet the emissions cap; and develop tracking, reporting, and enforcement mechanisms to ensure that the state achieves the reductions in GHG emissions necessary to meet the cap. AB 32 also includes guidance to institute emissions reductions in an economically efficient manner, and conditions to ensure that businesses and consumers are not unfairly affected by the reductions.

Assembly Bill 32 Climate Change Scoping Plan

In October 2008, CARB published its Climate Change Proposed Scoping Plan (Scoping Plan), which is the state's plan to achieve GHG reductions in California required by AB 32 (CARB 2008). The Scoping Plan contains the main strategies California will implement to achieve reduction of 169 million metric tons (MMT) of CO_2e, or approximately 30% from the state's projected 2020 emission level of 596 MMT of CO_2e under a business-as-usual scenario (this is a reduction of 42 MMT CO_2e, or almost 10%, from 2002–2004 average emissions). The Scoping Plan also includes CARB-recommended GHG reductions for each emissions sector of the state's GHG inventory. The largest proposed GHG reductions are recommended from improving emission standards for light-duty vehicles (estimated reductions of 31.7 MMT CO_2e), implementing the Low-Carbon Fuel Standard (15.0 MMT CO_2e, discussed below), implementing energy-efficiency measures in buildings and appliances, developing widespread combined heat and power systems (26.3 MMT CO_2e), and creating a renewable portfolio standard for electricity production (21.3 MMT CO_2e). CARB has not yet determined what amount of GHG reductions it recommends from local government operations; however, the Scoping Plan does state that land use planning and urban growth decisions will play an important role in the state's GHG reductions because local governments have primary authority to plan, zone, approve, and permit how land is developed to accommodate population growth and the changing needs of their jurisdictions. (Meanwhile, CARB is also developing an additional protocol for community emissions.) CARB further acknowledges that decisions on how land is used will have large impacts on the GHG emissions that will result from the transportation, housing, industry, forestry, water, agriculture, electricity, and natural gas emission sectors. The Scoping Plan states that the ultimate GHG-reduction assignment to local government operations is to be determined (CARB 2008). With regard to land use planning, the Scoping Plan expects that an approximately 5.0 MMT CO_2e reduction will be achieved associated with implementation of SB 375, which is discussed further below. The Scoping Plan was approved by CARB on December 11, 2008.

Executive Order S-1-07

Executive Order S-1-07, which was signed by then-Governor Schwarzenegger in 2007, proclaims that the transportation sector is the main source of GHG emissions in California, at more than 40% of statewide emissions. It establishes a goal that the carbon intensity of transportation fuels sold in California should be reduced by a minimum of 10% by 2020. This order also directed CARB to determine if this Low-Carbon Fuel Standard could be adopted as a discrete early action measure after meeting the mandates in AB 32.

Senate Bill 1368

Senate Bill (SB) 1368 is the companion bill of AB 32 and was signed by then-Governor Schwarzenegger in September 2006. SB 1368 required the California Public Utilities Commission (PUC) to establish a GHG emissions performance standard for baseload generation from investor-owned utilities by February 1, 2007. CEC was required to establish a similar standard for local publicly owned utilities by June 30, 2007. PUC adopted a GHG Emissions Performance Standard in January 2007. CEC adopted consistent regulations for implementing and enforcing SB 1368 for the state's publicly owned utilities in August 2007. These standards cannot exceed the GHG emissions rate from a baseload combined-cycle natural-gas-fired plant. The legislation further requires that all electricity provided to California, including imported electricity, must be generated from plants that meet the standards set by the PUC and CEC.

Senate Bills 1078 and 107 and Executive Orders S-14-08 and S-21-09

SB 1078 (Chapter 516, Statutes of 2002) requires retail sellers of electricity, including investor-owned utilities and community choice aggregators, to provide at least 20% of their supply from renewable sources by 2017. SB 107 (Chapter 464, Statutes of 2006) changed the target date to 2010. In November 2008, then-Governor Schwarzenegger signed Executive Order S-14-08, which expands the state's Renewable Energy Standard to 33% renewable power by 2020. Executive Order S-21-09, signed by then-Governor Schwarzenegger in September 2009, directs CARB to adopt regulations increasing California's Renewable Portfolio Standard to 33% by 2020, first established by Executive Order S-14-08.

Senate Bill 97

SB 97, signed August 2007, acknowledges that climate change is a prominent environmental issue that requires analysis under CEQA. This bill directs the California Office of Planning and Research (OPR) to prepare, develop, and transmit to the California Natural Resources Agency guidelines for the feasible mitigation of GHG emissions or the effects of GHG emissions, as required by CEQA, by July 1, 2009. On April 13, 2009, OPR submitted to the secretary for the Natural Resources Agency its proposed amendments to the state CEQA Guidelines for GHG emissions, as required by SB 97. On February 16, 2010, the Office of Administrative Law approved the amendments, and filed them with the Secretary of State for inclusion in the California Code of Regulations. The amendments became effective on March 18, 2010. These CEQA Guideline amendments provide guidance to public agencies regarding the analysis and mitigation of the effects of GHG emissions in draft CEQA documents.

SB 97 also removes inadequate CEQA analysis of effects of GHG emissions from projects (retroactive and future) funded by the Highway Safety, Traffic Reduction, Air Quality and Port Security Bond Act of 2006, or the Disaster Preparedness and Flood Protection Bond Act of 2006 (Proposition 1B or 1E) as a legitimate cause of action. This provision will be repealed on January 1, 2010, wherein inadequate CEQA analysis for those projects could then become a legitimate cause of action. This bill would only protect a handful of public agencies from CEQA challenges on certain types of projects for a few years' time.

Senate Bill 375

SB 375, signed in September 2008, aligns regional transportation planning efforts, regional GHG reduction targets, and land use and housing allocation. SB 375 requires Metropolitan Planning Organizations (MPOs) to adopt a Sustainable Communities Strategy (SCS) or Alternative Planning Strategy (APS) that would prescribe land use allocation in that MPO's Regional Transportation Plan (RTP). CARB, in consultation with MPOs, will provide each affected region with reduction targets for GHGs emitted by passenger cars and light trucks in the region for the years 2020 and 2035. These reduction targets will be updated every 8 years, but can be updated every 4 years if advancements in emissions technologies affect the reduction strategies to achieve the targets. CARB is also charged with reviewing each MPO's SCS or APS for consistency with its assigned targets. If MPOs do not meet the GHG reduction targets, transportation projects would not be eligible for funding (beginning January 1, 2012).

SB 375 also extends the minimum time for the Regional Housing Needs Allocation cycle from 5 years to 8 years for local governments located within an MPO that meet certain requirements. City or county land use policies (including General Plans) are not required to be consistent with the RTP (and associated SCS or APS). However, new provisions of CEQA would incentivize qualified projects that are consistent with an approved SCS or APS, categorized as "transit priority projects."

Regional and Local Plans, Policies, Regulations, and Laws

The San Diego County General Plan (August 2011) contains numerous policies in its Land Use, Mobility, Conservation and Open Space, and Housing Elements to address climate change. The following major strategies are identified in the County's General Plan:

- Reduce vehicle trips generated, gasoline/energy consumption, and GHGs.
- Reduce non-renewable electrical and natural gas energy consumption and generation (energy efficiency).

- Increase generation and use of renewable energy sources.
- Reduce water consumption.
- Reduce and maximize reuse of solid wastes.
- Promote carbon-dioxide-consuming landscapes.
- Maximize preservation of open spaces, natural areas, and agricultural lands.
- Reduce risk from wildfire, flooding, and other hazards resulting from climate change.
- Conserve and improve water supply due to shortage from climate change.
- Promote agricultural lands for local food production.
- Provide education and leadership.

The San Diego County General Plan update was adopted by the County Board of Supervisors on August 3, 2011. Several goals and policies that were adopted as part of the General Plan update carry out the primary objectives of AB 32. These include policies aimed at reducing GHG emissions (e.g., mitigation) and changing current strategies to adapt to climate change.

3.5.2 Guidelines for the Determination of Significance

No air district in California, including the San Diego Air Pollution Control District (SDAPCD), has identified a significance threshold for analyzing GHG emissions generated by a land use development project, such as the proposed project, or a methodology for analyzing impacts related to GHG emissions or global climate change. Although, by adoption of AB 32 and SB 97, the state of California has identified GHG-reduction goals and confirmed that the effect of GHG emissions as they relate to global climate change is inherently an adverse environmental impact issue. While the emissions of one single project will not cause global climate change, GHG emissions from multiple projects throughout the world could result in a cumulative impact. The following significance guideline is used to evaluate the project's GHG emissions: "The project would not conflict with the implementation of AB 32."

To meet AB 32 goals, California would need to generate less GHG emissions than current levels. It is recognized, however, that, for most projects, there is no simple metric available to determine if a single project would substantially increase or decrease overall GHG emissions levels.

AB 32 demonstrates California's commitment to reducing the rate of GHG emissions, and the state's associated contribution to climate change, without limiting population or economic growth within the state. Thus, to achieve the goals of AB 32, which are tied to GHG emissions

rates of specific benchmark years (i.e., 1990), California would have to achieve a lower rate of emissions per unit of population than it does now. Further, to accommodate future population and economic growth, the state would have to achieve an even lower rate of emissions per unit than was achieved in 1990. (The goal to achieve 1990 quantities of GHG emissions by 2020 means that this will need to be accomplished with 30 years of population and economic growth beyond 1990.) Thus, future planning efforts that would not encourage reductions in GHG emissions would conflict with the policy decisions contained in the spirit of AB 32, which would impede California's ability to comply with the mandate.

The state of California has established GHG-reduction targets and has determined that GHG emissions as they relate to global climate change are a source of adverse environmental impacts in California that should be addressed under CEQA. Although AB 32 did not amend CEQA, it identifies the myriad environmental problems in California caused by global warming (Health and Safety Code, Section 38501[a]). SB 97, however, did amend CEQA by directing OPR to prepare revisions to the State CEQA Guidelines addressing the mitigation of GHGs or their consequences. As an interim step toward development of required guidelines, in June 2008, OPR published a technical advisory titled "CEQA and Climate Change: Addressing Climate Change Through California Environmental Quality Act (CEQA) Review." OPR recommends that the lead agencies under CEQA make a good-faith effort, based on available information, to estimate the quantity of GHG emissions that would be generated by a proposed project, including the emissions associated with vehicular traffic, energy consumption, water usage, and construction activities, to determine whether the impacts have the potential to result in a project or cumulative impact, and to mitigate the impacts where feasible (OPR 2008).

In that document, OPR acknowledged that "perhaps the most difficult part of the climate change analysis will be the determination of significance," and noted that "OPR has asked CARB technical staff to recommend a method for setting thresholds [that] will encourage consistency and uniformity in the CEQA analysis of GHG emissions throughout the state." CARB has not yet completed this task at the time of this writing.

OPR updated Appendix G of the State CEQA Guidelines to address impacts of GHG emissions, as directed by SB 97 (2007). OPR made the following additions to Appendix G. An impact related to global climate change is considered significant if the proposed project would do either of the following:

- Generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment.

- Conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHGs.

The County DPLU recommends that a project should demonstrate that it would not conflict with the implementation of AB 32 by outlining how it would reduce overall carbon emissions to below business-as-usual, consistent with the state's GHG emissions-reduction targets. Based on the above information and for the purposes of the analysis in this EIR, the proposed project would have a significant impact if it would do the following:

- Result in emissions that would substantially hinder the state's ability to attain the goals identified in AB 32 (i.e., reduction of statewide GHG emissions to 1990 levels by 2020; approximately a 30% reduction from projected 2020 emissions per CARB's AB 32 Scoping Plan).

3.5.3 Analysis of Project Effects and Determination of Significant Impact

As described above, a single project does not have the ability to independently impact climate change on a global scale. Any climate change impacts associated with the Cumming Ranch project would be cumulative, and are discussed below.

3.5.4 Cumulative Impacts

Short-term construction and long-term operation of the Cumming Ranch project would generate emissions of GHGs. Construction emissions would be associated with vehicle engine exhaust from construction equipment, vendor trips, and employee commute trips. Operational emissions would be associated with area, mobile, and stationary sources. Area-source emissions would be associated with activities such as natural gas use for space and water heating, and maintenance of landscaping. Mobile-source emissions of GHGs would include project-generated vehicle trips for residents of and visitors to the development. In addition, increases in stationary-source emissions could occur at offsite utility providers associated with electricity generation that would supply the proposed uses.

GHG emissions generated by the proposed project would predominantly be in the form of CO_2. In comparison to criteria air pollutants, such as ozone and particulate matter, CO_2 emissions persist in the atmosphere for a much longer period of time. While emissions of other GHGs, such as CH_4 and N_2O, are important with respect to global climate change, the emissions levels of these other GHGs from the sources considered for this project are relatively small compared with CO_2 emissions.

Construction Emissions

Using the assumptions outlined in the Air Quality Study (Appendix H), construction emissions related to the roadway construction portion of the project were estimated using the Road Construction Model, version 5.2, and grading and building construction emissions for the project were evaluated using the emissions program URBEMIS 2007. Construction of the proposed project would generate a finite quantity of approximately 3,000 metric tons of CO_2 over the duration of construction activities (see Table 3.5-1). As stated as part of the project description, the proposed residential units were designed into the existing topography of the site, and, thus, the project would not require any mass site grading. This would aid in minimizing the amount of emissions generated by construction equipment.

USEPA plays a primary role in providing emissions standards for off-road construction equipment. The construction fleet used at a project site must meet these standards. USEPA has not adopted any regulations regarding reduction of GHG emissions on off-road construction equipment as of this writing.

Recent federal engine and fuel regulations will play a role in reducing GHG emissions from off-road equipment. Specifically, these include (1) current USEPA rules that set standards for all new on-road engines, (2) pending USEPA rules requiring similar reductions for all new non-road engines (to be phased in between 2008 and 2014), and (3) federal fuels standards for low sulfur and ultra low sulfur. This combination of engine and fuel standards would allow for use of new advanced retrofit technologies, which could potentially reduce GHG emissions. However, no regulations have been approved to date by USEPA to directly reduce GHG emissions.

Operation Emissions

Buildout of the proposed project would add a maximum of approximately 852 vehicle trips per day to the project area (RCE 2010). Operation of the project would generate total GHG emissions of 2,300 metric tons CO_2e annually during the lifetime of the project (see Table 3.5-2). Construction would contribute GHG emissions to a much lesser extent than operation of the proposed project, since construction emissions would cease after project completion, but operational impacts would be ongoing (with annual estimates presented in Table 3.5-2).

As described in Chapter 1, the project would incorporate the following design features that would also act to reduce GHG emissions:

- A community-level trail network was incorporated into project design. Trails would extend from Hardy Ranch into Area A, eventually connecting to Highland Valley Road. Another trail would be accessed from the southeastern portion of the project. At some time in the future, the community trails would be expected to interconnect and become part of a future regional trail system. Natural-colored decomposed granite would be installed in high-use areas and compacted native material would be used on the majority of the trail.

- Pathways would be provided along one side of all internal streets. The pathways would not be paved but would be covered with decomposed granite or a similar material to maintain a rural and informal setting. These pathways would total approximately 3.65 miles. A community pathway would also be provided along the north side of Highland Valley Road, beginning at the westernmost entrance to the project site and continuing east to the intersection with SR 67.

- The Landscape Concept Plan was designed with a natural plant palette to blend the project into the existing vegetation and provide a seamless transition between the residential development area and the adjacent open space areas and grasslands. The design guidelines encourage a transitional landscape approach with native and naturalized plant material suited for sustainable maintenance practices. Natural vegetation would be maintained to the fullest extent.

The trail network and pathways provided by the Cumming Ranch project would be used by pedestrians and bicyclists to connect to other destinations in the project area. It was assumed that these design features would reduce vehicle miles traveled and associated mobile-source GHG emissions by approximately 1% below the values presented in Table 3.5-2. The required native plant palette would reduce the amount of landscape irrigation necessary (as compared with nonnative landscaping), as the plants would be appropriately adapted to the climate. In addition, the project would comply with the County's Ordinance on Water Conservation in Landscaping.

As discussed previously, to meet the AB 32 mandate of 1990 GHG emissions levels by 2020, California would also need to reduce GHG emissions by approximately 30% from business-as-usual (CARB 2008, 2009b). The CARB Scoping Plan identifies expected GHG emissions reductions from regulations such as those that would reduce emissions from vehicles (e.g., AB 1493, Executive Order S-1-07 [i.e., the Low Carbon Fuel Standard]) and electric utilities (e.g., SB 107) (CARB 2008). Other regulatory measures identified under the Scoping Plan could reduce emissions associated with the Cumming Ranch project (as compared to the estimates presented in Table 3.5-2). The following reductions in GHG emissions from adopted regulations have been quantified and accounted for toward reductions from the values in Table 3.5-2:

SP-1: This analysis assumes full implementation of federal and/or state mandates for 2020 that would result in GHG emissions reductions associated with vehicle trips. According to the AB 32 Scoping Plan, implementation of the GHG emissions reduction standards for new passenger cars, pickup trucks, and sport utility vehicles under AB 1493 (or an equivalent federal program) would lead to a 19.7% reduction from the 2020 statewide GHG inventory. It is assumed that, due to the delay in the implementation of AB 1493, approximately 75% of the estimated GHG reduction would be realized by 2020.

SP-2: Renewable Portfolio Standard rules require the renewable energy portion of the retail electricity portfolio to be 33% by 2020. For San Diego Gas & Electric (SDG&E), the dominant electricity provider in the SDAB, approximately 6% of its current portfolio qualifies under the Renewable Portfolio Standard rules and, thus, the gain by 2020 would be approximately 27%.

The effectiveness of project design features and AB 32 companion legislation was estimated at approximately 13% compared to the baseline emissions presented in Table 3.5-2. The proposed project would generate a substantial net increase in GHG emissions. In addition, the project does not include measures that would reduce GHG emissions to achieve a 30% reduction in GHG emissions from the levels presented in Table 3.5-2, consistent with CARB's Scoping Plan. For these reasons, the project is considered to have a ***potentially significant cumulative*** impact on climate change per the Guideline (**Impact CC-1**).

3.5.5 Mitigation Measures

Table 3.5-3 summarizes the potential reduction in GHG emissions from onsite operational mitigation measures and existing legislation addressing climate change.

Mitigation Measure CC-1 Reduce Project-Generated GHG Emissions Contributing to Climate Change

Construction-Generated Emissions – To be required on the grading and improvement plans:

The grading and improvement plans shall specify that the contractor shall:

a. Maintain construction equipment in good working order per the manufacturer's specifications.

b. Limit idling time for construction equipment and vehicles to five minutes.

Operational Emissions

The Site Plan shall require the project developer implement the following mitigation measures or other equivalent measures consistent with OPR guidance to meet the specified performance criteria deemed feasible by the County to reduce GHG emissions.

c. Meet California Green Building Code standards for energy efficiency in all new residential units. Examples of these standards include use of Energy Star equipment, water-conserving plumbing fixtures, use of regional materials, and use of products with recycled content.

d. Generate a minimum of 10% of the project's energy consumption from onsite renewable energy-generation sources (e.g., photovoltaic cells or other onsite energy generating technology). For example, the estimated roof size of the photovoltaic system required to generate 10% of the project's energy is approximately 4,405 square feet.

e. Reduce outdoor water consumption by a minimum of 50% based on 2008 RMWD usage (e.g., rainwater collection systems).

f. Install solar water heaters in all proposed units.

3.5.6 Conclusions

The project would contribute a limited amount of GHG emissions during the construction phase of the project. However, during operation, the project would contribute ongoing GHG emissions, most considerably in the form of vehicle emissions associated with the residents of the development. Although the Cumming Ranch project would not independently cause a direct climate change impact, these project-generated emissions are considered to contribute cumulatively to global climate change.

The analysis and GHG inventory indicates that the proposed project would achieve a 30% reduction from the emissions levels as presented in Table 3.5-2 through mitigation. A minimum of 17.3% GHG emissions-reduction mitigation would be implemented on the project site, with the remaining GHG reduction occurring through the GHG emissions-reductions from regulations identified in the CARB Scoping Plan. The emissions reductions from forthcoming GHG regulation represent the upper bound of the potential emissions reductions associated with Executive Order S-21-09 and AB 1493. The statewide emissions reductions shown in Table 3.5-3 assume that no other emissions reduction activities would occur. In reality, implementation of the project's GHG mitigation measures and these statewide regulations would occur at various

times, potentially simultaneously or one preceding another. However, GHG emissions sectors affected by both the project's mitigation measures and statewide regulations would not have a purely additive effect. Rather, emissions reductions achieved by one (i.e., mitigation measures or statewide actions) would reduce the capacity for the other to reduce emissions. For example, if statewide actions would reduce electricity-consumption-related emissions by 20% prior to implementation of the project's energy-efficiency measures, then the project's mitigation measures would only be able to affect the remaining 80% of the project's total electricity consumption emissions. The timing and synergistic effect of the statewide regulations in relation to the project's GHG mitigation measures is uncertain at the time of this writing. However, due to the focus of this EIR on the project's emissions reduction measures, the emissions reductions achieved by the project's measures were determined first.

As a result of successful implementation of a 30% reduction in GHG emissions from the levels in Table 3.5-2, the project would be considered consistent with the goals of AB 32, and the incremental increase in GHG emissions associated with this project would be considered less-than-cumulatively considerable, with mitigation incorporated. This cumulative impact (**Impact CC-1**) would be reduced to a ***less-than-significant*** level.

Table 3.5-1
Estimated Construction-Generated Greenhouse Gas Emissions (unmitigated)

Year	CO_2 (lb/day)	CO_2 (MT/yr)
2008	1,839	37
2009	9,575	1,147
2010	6,958	833
2011	6,958	833
2012	4,586	137
Total CO_2 emissions (MT)	--	**2,987**

CO_2 = carbon dioxide; lb/day = pounds per day; MT = metric tons; MT/yr = metric tons per year
See Appendix H and O for URBEMIS model output and CO_2 calculations, respectively.
Source: EDAW 2008b

Table 3.5-2
Estimated Operational-Related Greenhouse Gas Emissions (unmitigated)

Emission Source	CO_2e (MT/yr)	Percent of Total
Area (Natural Gas)	468	20%
Motor Vehicles	1,389	60%
Electricity Consumption	320	14%
Water Consumption	127	6%
TOTAL	**2,304**	

CO_2e = carbon dioxide equivalent; lb/day = pounds per day; MT/yr = metric tons per year
The first year of full project operation was assumed to occur in 2030.
See Appendix H and O for URBEMIS model output and CO_2 calculations, respectively.
Source: EDAW 2008b

Table 3.5-3
Estimated Greenhouse Gas Emissions Reduction Potential from Implementation of Project Design Features and Operational Mitigation Measures

Design Feature/ Mitigation Measure	Measure Performance Standard (Unscaled % GHG Reduction)	Applicable GHG Emissions (% of Total GHG Inventory)	Scaled Emission Reduction (Unscaled % GHG Reduction % of Inventory)	Sources of Information*
Pathway/trail network throughout project	1%	60%	0.6%	1
MM 3.1-5c Meet California Green Building Code[a] standards	21.2% (applicable to residential electricity consumption)	14%	3.0%	2
	8.5% (applicable to residential natural gas consumption)	20%	1.7%	2
MM3.1-5d 10% onsite renewable energy	10%	14%	1.4%	

Design Feature/ Mitigation Measure	Measure Performance Standard (Unscaled % GHG Reduction)	Applicable GHG Emissions (% of Total GHG Inventory)	Scaled Emission Reduction (Unscaled % GHG Reduction % of Inventory)	Sources of Information*
DF-3, MM 3.1-5e Reduce outdoor water consumption by 50%	37%	6%[a]	2.2%	3
MM 3.1-5f Solar water heaters	70%	12%[b]	8.4%	4, 5
Total Reductions from Design Features and Mitigation Measures			*17.3%*	
SP-1 AB 1493 or equivalent standards	14.8%	60%	8.9%	6
SP-2 Renewable Portfolio Standard	27%	14%	3.8%	6
Total Reductions from Scoping Plan Measures			*12.7%*	
Total GHG Emission Reduction			**30%**	

GHG = greenhouse gas; MM = Mitigation Measure; SP = Scoping Plan Measure

[a] Assumes approximately 74% of water consumption in single-family residential units is for outdoor use.

[b] Assumes approximately 60% of natural gas consumption in single-family residential units is for water heating.

* Sources:

1. Dierkers, G., E. Silsbe, S. Stott, S. Winkelman, and M. Wubben. 2007. CCAP Transportation Emissions Guidebook. Center for Clean Air Policy. Washington, D.C. Available at http://www.ccap.org/ safe/guidebook.php. As cited in California Air Pollution Control Officers Association 2008, CEQA and Climate Change.
2. California Energy Commission. 2007. Impact Analysis 2008 Update to the California Energy Efficiency Standards for Residential and Nonresidential Buildings.
3. Department of Water Resources. 2001. Statewide Indoor/Outdoor Split. Available at http://www.landwateruse.water.ca.gov/annualdata/urbanwateruse/2001/landuselevels.cfm?use=8.
4. U.S. Department of Energy. 2009. Solar Water Heater. Available at http://www.energystar.gov/ ia/new_homes/features/ WaterHtrs_062906.pdf. California Energy Commission 2007.
5. U.S. Department of Energy; Energy Information Administration. 2009. Residential and Commercial Energy by End Use Sector. Available at http://www.eia.doe.gov/emeu/consumption/index.html.
6. California Air Resources Board. 2008. Climate Change Proposed Scoping Plan. Sacramento, California. Available at http://www.arb.ca.gov/cc/scopingplan/document/scopingplandocument.htm.

Data compiled by EDAW 2008b.

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3.6 Public Services and Recreation

This section addresses potential environmental impacts associated with the provision of emergency services, schools, water and sewer systems, recreational facilities, and solid waste services. Additional information pertaining to wildfire hazards is provided in Section 4.1.2, Hazards and Hazardous Materials.

3.6.1 Existing Conditions

Fire Protection

Fire protection services are provided to the project site through the Ramona Fire Department (RFD) and California Department of Forestry and Fire Protection (CAL FIRE). In 1981, RFD was consolidated into RMWD. In 1993, RMWD entered into a contract with CAL FIRE to provide fire/paramedic personnel to RMWD.

The RFD/CAL FIRE boundaries correspond to the RMWD boundaries, serving roughly 22,000 people. RFD/CAL FIRE currently operates three stations in the area: one in the Ramona Town Center (Station 80), one within the San Diego Country Estates (Station 81), and one on Dye Road (Station 82) off of SR 67 in the Highland Valley area. The station closest to the project site is Station 82, located less than 0.5 mile east of the project. RFD/CAL FIRE and the San Pasqual Volunteer Fire Department have an automatic aid agreement; in the event of an emergency, both agencies have agreed to respond.

Station 80 provides mainly structural fire service with minimal wildland fire capabilities. Station 80 equipment includes one Type 1 fire engine and one paramedic ambulance. Staffing includes one fire captain, one engineer/driver, and two paramedic/firefighters. The station also has a rescue rig that is currently out of service due to a shortage in staffing.

Station 81 also provides mainly structural fire service with minimal wildland fire capabilities. Station 81 equipment includes one Type 1 fire engine and one paramedic ambulance. Staffing includes one fire captain, one engineer/driver, and two paramedic/firefighters.

Station 82 also provides mainly structural fire service with minimal wildland fire capabilities. Station 82 equipment includes one Type 1 paramedic/fire engine. The station also has a San Diego County Light Air Support Vehicle that does not have fire-fighting capabilities and responds to any incident within San Diego County. Staffing includes one fire captain, one engineer/paramedic, and one volunteer driver.

Law Enforcement

The San Diego County Sheriff's Department (Sheriff's Department) is the chief law enforcement agency in the County. The Sheriff's Department provides general law enforcement and jail functions for the people of the County in a service area of approximately 4,200 square miles. In the unincorporated areas, the Sheriff's Department provides generalized patrol services and all of the necessary law enforcement investigative services. The Sheriff's Department, through the Law Enforcement Bureau, deploys approximately 275 patrol cars and employs 1,300 personnel, of which half are deputies.

The Ramona Sheriff's Substation serves the Cumming Ranch project site. The Ramona Sheriff's Substation is located in the County complex at 1424 Montecito Road. Patrol deputies are available and on-duty 24 hours a day, 7 days a week. There are two to five deputies on duty at any given time. Deputies at the Ramona Sheriff's Substation have law enforcement responsibility for approximately 150 square miles.

Schools

The Ramona Unified School District (RUSD) provides school services to the Ramona area. The schools within the RUSD are as follows:

- Barnett Elementary
- Hanson Lane Elementary
- James Duke Elementary
- Mount Woodson Elementary
- Ramona Community School
- Ramona Elementary
- Olive Peirce Middle
- Montecito High
- Ramona High

In 2003, RUSD had a total enrollment of 7,359 students in kindergarten through grade 12. However, in 2007, the total enrollment dropped to approximately 6,750 students (RUSD 2009). Historically, RUSD has experienced a steady increase in enrollment, reflecting growth patterns in the area. Enrollment typically increased by approximately 100 to 200 students per year since 1975. RUSD is currently operating at capacity and is using all sources to maintain adequate levels of service.

Water Supply and Service

Water supply and service is provided to the Ramona area by RMWD. According to RMWD's 2005 Urban Water Management Plan, RMWD provides water service to approximately 7,000 urban parcels and 3,000 rural parcels (greater than 1 acre), and supplies an average of 11,903 acre-feet per year (AF/YR) of treated and untreated water. Municipal and industrial uses constitute about 64% of consumption, and agricultural use accounts for approximately 36% of the water demand (RMWD 2005).

RMWD purchases the majority of its treated and untreated water through San Diego County Water Authority (SDCWA). In the past, RMWD also purchased a portion of its water supplies from nearby Lake Sutherland, which is owned by the City of San Diego. RMWD does not currently draw water from Lake Sutherland because RMWD's Bargar Water Treatment Plant is not operational at this time. RMWD owns three wells that may be used in an emergency. See Table 3.6-1 for RMWD's projected available water supply and demand during normal years between 2005 and 2025.

As shown in Table 3.6-1, RMWD receives the majority of its water through SDCWA. SDCWA is a public agency serving the San Diego region as a wholesale supplier of water. SDCWA serves 24 member agencies, including RMWD. Historically, SDCWA obtained the majority of its water through the Metropolitan Water District, which receives its main water supplies from northern California and the Colorado River (Figure 3.6-1). In recent years, SDCWA and its member agencies have taken significant and measurable steps in water resource conservation and in diversifying water supplies sources. According to SDCWA's Updated 2005 Urban Water Management Plan (updated April 2007), water conservation programs in the San Diego region saved an average of 40,500 AF/YR of water from 2002 through 2006. Projections indicate potential annual savings will rise to 87,306 AF/YR by 2015 and 108,396 AF/YR by 2030. In 2003, conserved agricultural transfer water from the Imperial Valley (Imperial Irrigation District [IID] Transfer Agreement) began flowing to the San Diego region, which is projected to provide 200,000 AF/YR of water by 2021. Also in 2003, SDCWA was assigned rights to 77,700 AF/YR of conserved water due to the lining the All-American and Coachella Canals. Deliveries have started and were projected to be at the full level of 77,700 AF/YR in 2010 (SDCWA 2007).

Contributing to the region's diversified mix of water sources are member agency local supplies, including surface water, water recycling, groundwater, groundwater recovery, and seawater desalination. In November 2009, construction began on the Carlsbad Desalination Plant. The plant is being built by Poseidon Resources under a private/public partnership agreement between Poseidon Resources and nine local agencies. The facility, capable of processing 50 million

gallons per day (56,000 AF/YR), is scheduled to be operational in 2012 (Poseidon 2009). SDCWA normal water year projected supply and demand is provided in Table 3.6-2. The diversified future water supply planned by SDCWA and member agencies, along with reliable imported water supplies from Metropolitan Water District, is critical to meeting existing and future water demands of the region.

The Ramona area receives delivery of its purchased water from SDCWA through the Poway Pump Station. RMWD has two terminal storage reservoirs (West End and Mount Woodson). The immediate area surrounding the Cumming Ranch project site is currently provided water via the Mount Woodson Terminal Storage Reservoir. The Cumming Ranch project site is located within Phase 1 of the RMWD Downtown Operational Storage Zone, which is planned to receive its water via the West End Terminal Storage Zone. Phase 1 encompasses the facilities within the southwestern downtown area and Phase 2 encompasses the facilities within the northeastern downtown area. Based on the outcome of the ongoing studies and engineering, it is likely that the planned improvements to the Downtown Operational Storage Zone would combine Phases 1 and 2 into a single storage zone, and water would be delivered to the project from a new reservoir located southwest of the intersection of SR 67 and Dye Road. It is anticipated that the new reservoir would have a total capacity of 3 million gallons, and would consist of two above-ground storage tanks constructed in two phases, with the first phase being completed within the next 5 years. The new reservoir would likely be sited on approximately 2 acres of land, although no property has been purchased for this use at this time. It is anticipated that the pipelines associated with new storage would be located primarily in existing disturbed easements or roadways.

Existing water facilities in the vicinity of the Cumming Ranch project site include a 20-inch-diameter pipeline located in SR 67. Bringing water from the west, this pipeline transitions to a 16-inch-diameter main east of the intersection of Mussey Grade Road. A 10-inch-diameter pipeline in the original alignment of Highland Valley Road extends through the Cumming Ranch site and connects with the pipeline in SR 67, a few hundred feet east of the property boundary.

Sewer Service and Treatment

Sewer treatment service is provided to Ramona customers through two wastewater treatment plants: SMWWTP, which serves the downtown Ramona area, and the San Vicente Wastewater Treatment Plant, which serves the San Diego Country Estates. The project site is contiguous to the SMWWTP service area and would be served by that facility.

The Cumming Ranch site is within the RMWD, but is not located within the RMWD latent sewer power area. LAFCO approval of an expansion of the RMWD latent sewer power area to include the proposed project area is required before the project can receive sewer service from RMWD. SMWWTP is under the regulation of the San Diego region (Region 9) of the California Regional Water Quality Control Board (San Diego RWQCB). SMWWTP is an activated sludge secondary-level treatment facility located near Sawday Street on the western edge of the Ramona Town Center.

The SMWWTP is currently at or above capacity. The SMWWTP is currently designed and rated for 1.0 MGD. The facility's capacity and spray fields for discharge are insufficient during periods of heavy rainfall when the average dry-weather flow can approach or exceed the 1.0 MGD capacity (RMWD 2009a). Heavy rainfall increases the amount of wastewater entering the system and, at the same time, decreases the efficiencies of the holding ponds and spray fields.

As outlined below, certain actions have been taken by the RMWD Board of Directors to upgrade and expand the SMWWTP facilities:

- On December 27, 2006, the RMWD Board of Directors authorized RBF Consulting to prepare a Pre-Design Report to evaluate expansion of existing facilities. The scope for pre-design of the Santa Maria Sewer Service Area improvements consists of the following:
  a. determination of required facilities to accommodate phased expansion,
  b. conceptual layouts for phased expansion,
  c. preparation of cost estimates, and
  d. preparation and allocation of costs to existing and future customers.
- In 2008, RMWD purchased 285 acres for use in its spray field operations. This land was formerly under lease from the owners of the Davis Ranch. The spray fields are located east of Rangeland Road, across the road from other spray fields owned by RMWD.
- In December 2008, RMWD, as lead agency, began the environmental process necessary to implement the planned system-wide expansion of the SMWWTP. An NOP of environmental review per CEQA requirements was issued on December 29, 2008 (SCH# 2008121130). This environmental evaluation is a supplemental document to the previously prepared Program EIR for the RMWD Water and Wastewater Master Plans (SCH# 98111025) that was certified in February 1999, which included schematic expansions to the treatment plant (RMWD 2008).

- On April 14, 2009, RMWD's Board of Directors authorized awarding the design services contract to RBF Consulting for the Santa Maria Sewer Service Area Facility Improvements (RMWD 2009a). As indicated earlier, RMWD's Final Supplemental EIR for the expansion of the SMWWTP from 1.0 MGD to 1.47 MGD was certified on May 25, 2010. According to the Supplemental EIR, the three-phase expansion is described as follows: Phase 1 would expand the plant to 1.14 MGD, which would provide service to the 4,087 equivalent dwelling units (EDUs) connected as of June 30, 2005. Phase 2 would expand the plant to 1.28 MGD and provide treatment capacity for an additional 608 EDUs. Phase 3 would expand the plant to 1.47 MGD, which would serve an additional 608 EDUs for a total of 1,216 EDUs. The existing plant is sited on 13.1 acres of land on the west side of North Sawday Street. The project would also construct two new wet-weather storage ponds located west of the existing ponds. The existing spray fields east of Rangeland Road will be reconfigured as evaporation terraces (RMWD 2010a).
- On December 13, 2012, RMWD stated that the sewer system evaluation containing preliminary requirements for the Cumming Ranch project expired in June 2012. RMWD will require the project applicant to prepare a new evaluation. The new evaluation will consider whether lesser, incremental improvements would be sufficient to serve the project rather than proceeding with Phases 1 and 2 of the SMWWTP Expansion project (RMWD, Ricardo Soto, Personal Communication).

Recreational Facilities

The Cumming Ranch property has been used primarily for cattle grazing and dry-land farming of oat-hay since the 1950s. There are no existing parks or trails systems on the Cumming Ranch site. The Ramona Community Plan has set forth the goal to develop a comprehensive plan of local, neighborhood, community, and regional park facilities directed to the needs of all age levels and, whenever feasible, incorporate outstanding natural features of the planning area (County of San Diego 2002b). Existing recreational opportunities for the Ramona community consist of a local park within the Ramona Town Center called Collier Park. This is an 8-acre local park consisting of ball fields, play equipment, picnic areas, restrooms, and open areas. This park is located on 7th Avenue, west of SR 78, approximately 3.5 miles from the Cumming Ranch site. Also, Ramona Community Park is within the Ramona Town Center west of SR 78 and is approximately 4.0 miles from the Cumming Ranch site. This 166-acre park is located on RMWD land in conjunction with well fields. Currently, RMWD has an agreement with the Ramona Parks and Recreation Association to manage the well field area. The facilities provided at this park include baseball and soccer fields and a community center. In addition, west of the

Cumming Ranch site on Dye Road is the Holly Oaks Equestrian staging area, which is a 42-acre local park.

The County also maintains the Dos Pico Regional Park located west of Mussey Grade Road, approximately 3 miles from the Cumming Ranch site. This 79-acre camping park serves the entire County. The County also maintains the Mount Gower and Simon Open Space Preserves. Mount Gower is a 1,591-acre preserve located southeast of the Ramona Town Center and has approximately 8 miles of hiking and equestrian trails within its boundaries. A primitive campground is available for groups of 10 or more, and water and vault toilets are provided at the trailhead. Simon Open Space Preserve is a 618-acre preserve located southwest of the Mount Gower Preserve, near the San Diego Country Estates development. The park offers a 550-foot trail climb to Ramona Peak, which is open to hikers, mountain bikers, and equestrians.

Solid Waste

Ramona Disposal Service is the exclusive solid waste hauler and recycler for residential and business accounts in Ramona. Solid waste is transferred to and disposed of at Sycamore Landfill located at 8514 Mast Boulevard in Santee (Gonzales 2011). The landfill is owned and operated by Allied Waste Industries, Inc. The Sycamore Landfill is expected to have capacity available until 2031 (CalRecycle 2011).

3.6.2 Guidelines for the Determination of Significance

The guidelines for determination of significance for public services and recreation impacts are derived from Appendix G of the CEQA Guidelines. The project would have a significant environmental impact related to the provision of public services and recreation if project implementation would do any of the following:

1. Have a direct or cumulative effect upon, or result in a need for, new or altered services or infrastructure that would result in an adverse physical effect to the environment that would be considered significant.
2. Substantially exacerbate directly or cumulative the performance levels of existing public service facilities and infrastructure such that significant adverse physical effects to the environment would occur.
3. Include recreational facilities (e.g., trails) or require the construction or expansion of recreational facilities, directly or cumulatively, that might have an adverse physical effect on the environment.

4. Result in the excessive use of water or exceed available entitlements or resources either individually or cumulatively.

3.6.3 Analysis of Project Effects and Determination as to Significance

Fire Protection

Fire protection for the project would be provided by RMWD/RFD, under contract with CAL FIRE, for structural fire protection and emergency medical services. Wildland fire protection is the responsibility of CAL FIRE. The Cumming Ranch project would add 125 homes to the service area of Station 82.

Station 82 is approximately 0.5 mile from the project site, located directly east of the project on Dye Road. Due to the proximity of Station 82 to the project site, emergency fire service could respond to all residential lots of the project site in 5 minutes travel time, which is less than the 10-minute objective stated in the Safety Element. Caltrans recently installed Emergency Vehicle Preemption Devices at the intersection of SR 67 and Highland Valley Road to facilitate signal preemption for emergency vehicles to stop opposite-direction traffic, allowing the emergency vehicles to pass safely and more quickly through the intersection. Although Station 82 would provide first response service to the project site, Stations 80 and 81 would provide back-up service. These stations are approximately 3 miles and 9 miles, respectively, from the site. At 3 miles, back-up service from Station 80 could also serve the project site in an acceptable response time. Additionally, RMWD/RFD has an automatic aid agreement with the San Pasqual Fire Department to provide back-up service in an emergency situation. CAL FIRE would also provide emergency services, if the situation warranted, as it too has an automatic aid agreement with RFD.

The County's Fire Mitigation Fee Program would require an amount per square foot of development, which is revised annually as determined by County Ordinance, to be paid to the fee program prior to the issuance of building permits. The fees would be allocated to RMWD/RFD for the development of facilities and capital improvements. However, RMWD/RFD has indicated that they are in an extreme budget crisis and would not be able to adequately serve the project and continue to maintain an appropriate level of service and protection for the rest of the community (RMWD 2010b). The Project Facility Availability Form for fire protection service and letter of conditions state that RMWD/RFD anticipate that additional staff would be required at Station 82 to provide adequate service, along with other potential equipment or infrastructure needs yet to be determined. The form states that adequate fire protection service would be available to the project only with additional funding, as conditioned in the letter (RMWD 2011a).

The project site would be served by existing facilities located in proximity to the project that allow for adequate response and travel times. However, the applicant would be required to contribute to the Fire Mitigation Fee program, which would provide for fairshare funding of facilities and other capital improvements. RMWD/RFD has not identified any new facilities or alterations to existing facilities that would be needed due solely to the proposed project or due to the proposed project in combination with the other cumulative projects. Consequently, it is not possible to analyze potential impacts from future new or expanded fire facilities at this time. Therefore, the project would not cause a significant impact under Guideline 1 above.

Because RMWD/RFD has indicated that they would not be able to adequately provide service to the project without funding for additional staff and other as yet unidentified necessary infrastructure and equipment, there is a ***potentially significant*** impact to the environment from the project related to the provision of fire protection services, per Guideline 2 (**Impact PS-1**).

Law Enforcement

The Ramona Sheriff's Substation would provide law enforcement service for the proposed project. The number of officers available to respond to calls for the Cumming Ranch project depends on several factors, including type of incident, distribution of personnel, level of activity, and time of day. Due to the relatively small size of the project in relation to the population served by the Ramona Sheriff's Substation, the law enforcement demands caused by the proposed project would not necessitate new or expanded facilities. The Sheriff's Department has indicated that the property tax base will provide funding for adequate law enforcement services for the Cumming Ranch area, and that there would not be a need for new or expanded Sheriff's facilities to serve the project. Consequently, there would not be any direct environmental impacts from the need for new or expanded law enforcement facilities or as a result of substantially exacerbating existing performance levels of existing facilities (Mays, 2012). For these reasons, none of the Guidelines would be exceeded, and the proposed project would result in a ***less-than-significant*** impact to the environment related to the provision of law enforcement services.

Schools

The project site is within the service area of RUSD. Although RUSD has not provided student generation rates, an estimated student generation rate can be calculated based on existing school-age children per household for the area covered by RUSD. In 2000, the Ramona Community Plan Area had a total of 11,190 housing units (SANDAG 2003). In 2000, the total population for school-age children between the ages of 5 and 19 was 8,538 (SANDAG 2003). Using these

numbers, approximately 1.3 students per household would be generated by the project. Thus, the Cumming Ranch project would generate approximately 163 students.

Due to overcrowded conditions at schools within the area, RUSD is not able to identify specific schools that students residing within the Cumming Ranch development would attend (RUSD 2007). Any new growth-generating increased school enrollments would necessitate increased school services, and possibly new school facilities. Within the past 5 years, RUSD constructed a new school facility for Hanson Elementary School, and the Ramona Community School moved into the old Hanson Elementary School buildings. In addition, Olive Peirce Middle School was expanded with a new building for classrooms. If required, the expansion of facilities on existing RUSD property would likely not cause significant impacts to the physical environment, as the facilities would be developed on previously disturbed sites. If additional schools were to be developed, they would be required to comply with CEQA and all applicable environmental regulations. These potential new developments would increase the capacity of RUSD and its ability to service the increasing population.

California law allows the governing body of a school district to impose a fee on all new development within a district's jurisdiction for the purpose of funding the construction or reconstruction of school facilities. In the Ramona area, school fees are collected by the County and then transferred to RUSD. The fees for the Ramona area are currently $2.97 per square foot (RUSD 2009). The proposed project would be required to pay school fees prior to issuance of building permits. With the collection of school fees, it is estimated that the Cumming Ranch project would generate approximately $1.2 million for RUSD for the development of new facilities. Although this fee is often an insufficient amount to fund 100% of new school facility construction and operation, the California State Legislature has declared that the school impact fee is determined to be full and adequate mitigation under CEQA. Under California Government Code Section 65996, the County is limited to charging the statutorily created fee to offset impacts to local school districts generated by proposed projects. Section 95996 does not provide for remediation of existing deficiencies in school services. As described above, expansion of RUSD facilities, including elementary through high school facilities, is currently in the planning process and will increase the ability of the school district to serve an increased student population. For these reasons, none of the Guidelines would be exceeded, and implementation of the proposed project would result in a ***less-than-significant*** impact to school services and facilities.

Water Supply and Service

The average household in Ramona, based on 3.2 persons per household, consumes approximately 554 gallons of water per day (gpd). Thus, the 125 residential units included in the Cumming Ranch project would generate a total average daily demand of 69,250 gpd (Table 3.6-3). The maximum daily demand for the project, using a peak factor of 3.0, would be 207,750 gpd (RMWD 2009b). Based on the project's total average daily demand, the project would consume the equivalent of approximately 78 AF/YR. As discussed in Section 3.6.1, SDCWA, which supplies the majority of RMWD's water, has diversified its water resources and implemented plans to ensure that water for the region would be available in the future. The project has been designed to substantially reduce this amount due to the global climate change mitigation requirements.

A Project Facility Availability Form for water service was prepared by RMWD (RMWD 2011b) and stated that water availability and facilities to serve the project could be available within 5 years, if specific conditions are met. Conditions included a water commitment agreement, payment of fees, and execution of all appropriate agreements.

The proposed onsite water distribution system is illustrated in Section 1.1.3 and Figure 1-10. The water distribution system would be constructed with 8-inch- to 12-inch-diameter polyvinyl chloride (PVC) pipelines located beneath the project roadways. The onsite pipelines would be supplied from an RMWD-planned 16-inch-diameter main line located within Highland Valley Road. As required by RMWD, the onsite pipelines would be looped to provide redundancy in supply, to improve water quality by avoiding dead-end mains, and to meet fire flow demands and pressures by providing water from two directions to supply hydrants.

Water for the immediate project vicinity is currently provided from the Mount Woodson Terminal Storage Reservoir; however, there is a limitation on the quantity of water that can be delivered under the currently configured system. RMWD is currently planning a new reservoir (consisting of two 1.5-million-gallon tanks) that would serve the southwestern area (Phase I) of the Downtown Operational Storage Zone. The Downtown Operational Storage Zone would be served via the West End Terminal Storage Zone. The Cumming Ranch project is expected to receive its water from the new reservoir. These facilities are currently in the planning stage, and it is reasonable to anticipate that they would be operational within 5 years (RMWD 2011b).

At this time, no NOP or other environmental documentation has been prepared for the planned water supply improvements to the Downtown Operational Storage Zone. RMWD, as the lead agency under CEQA, would be responsible for the environmental assessment of potential

impacts associated with the planned water service expansion and for providing mitigation to reduce those impacts. The environmental review would likely be a supplemental document to the Program EIR for the RMWD Water and Wastewater Master Plans, similar to the SMWWTP expansion project's Supplemental EIR, which was certified in May 2010. The environmental analysis would occur once ongoing planning and engineering are more complete. However, it can be expected that potential environmental impacts may occur. Impacts typically resulting from infrastructure improvements, such as pipelines or pump stations, may include air quality emissions during construction, construction noise impacts, cultural impacts during ground disturbance, and temporary and permanent biological impacts to habitat and sensitive species, among others. Similar construction impacts would likely result from the new reservoir. Also, it is possible that a visual impact would result from the two above-ground storage tanks. It is likely that these anticipated impacts could be mitigated to a less-than-significant level through measures such as BMPs to reduce air quality emissions of particulate matter and fugitive dust during construction, monitoring for cultural resources during ground-disturbing activities, restoration or creation of sensitive habitats and wetlands at appropriate ratios, avoidance of construction during sensitive bird breeding seasons, and other mitigation requirements as determined through the environmental review. If required, visual mitigation of the storage tanks may include specific paint treatments, landscaping, or other aesthetically enhancing measures as proposed by RMWD as the lead agency for CEQA review.

As described above, it is anticipated that the potential impacts associated with implementation of improvements to the Downtown Operational Storage Zone and associated infrastructure, such as the storage reservoir, would be mitigated and that the improvements needed to serve Cumming Ranch would not create significant impacts. All potential environmental impacts would be addressed by RMWD, the lead agency for these improvements, prior to implementation. The water demand described in this section would be within that anticipated and planned by RMWD, and would not require the installation of additional facilities beyond those already planned by RMWD. Therefore, the project is not expected to result in a significant impact on water services. However, since providing water service to the Cumming Ranch project requires infrastructure that is being planned, but is not yet in place, a ***significant impact*** would result per Guidelines 1 and 2 (**Impact PS-2**).

Sewer Service and Treatment

Wastewater from the Cumming Ranch project site would be conveyed to and treated at SMWWTP, located immediately east of the project at the northeast corner of Area B. The Cumming Ranch project site is not currently served by or within the latent powers sewer service area of RMWD. Expansion of latent powers would be necessary for development of the

Cumming Ranch sewer services, which would require LAFCO approval, as discussed in Section 3.6.1. A Project Facility Availability Form for sewer service was prepared by RMWD (RMWD 2011c) and stated that facilities to serve the project could be available within 5 years if specific conditions are met. Conditions include a pre-annexation or pre-latent-power expansion agreement; application to, and approval from, LAFCO; payment of fees; and execution of all appropriate agreements.

The Cumming Ranch project would use an onsite gravity system to collect wastewater from the individual homes. The gravity system flows into the proposed sewer lift station located just east of Lot 125 in the northern portion of Area A. From the lift station, a proposed main sewer line would convey the wastewater directly to the SMWWTP.

The SMWWTP is currently at or above capacity. As described in Section 3.6.1, RMWD is currently planning major improvements and expansion of the SMWWTP, which would increase the capacity of the facilities from 1.0 MGD to 1.47 MGD in three phases. Phase 1 would be designed to improve service to existing clients, Phase 2 would serve 608 EDUs, and Phase 3 would also provide service for 608 EDUs. This total expansion of wastewater service for more than 1,216 additional EDUs would adequately provide service for the Cumming Ranch project, which would add 125 dwelling units. As described in Section 3.6.1, RMWD has completed the CEQA environmental review process required for implementation of the necessary improvements to the SMWWTP and its spray fields to accommodate future demand, including the Cumming Ranch project. The wastewater demand resulting from the proposed project would be within that anticipated by RMWD, and would not require the installation of additional facilities beyond those already planned by RMWD. RMWD as the lead agency under CEQA was responsible for the environmental assessment of potential impacts associated with its wastewater service expansion and for providing mitigation to reduce those impacts. The Supplemental EIR prepared by RMWD found potentially significant impacts to biological habitat, including permanent and/or temporary impacts to southern coast live oak riparian forest, southern cottonwood-willow riparian forest, alkali meadow, coast live oak woodland, southern willow scrub, pasturelands, nonnative grasslands, areas functioning as Stephens' kangaroo rat habitat, non-wetland waters of the U.S./streambed, incised drainage, and emergent wetlands. Potential impacts to special-status species, including arroyo toad and Stephens' kangaroo rat, were also identified. The environmental analysis found that all potentially significant impacts could be mitigated to below a level of significance with implementation of mitigation, as detailed within the Supplemental EIR. Potential land use and planning effects, aircraft hazards (bird strikes), and short-term construction traffic impacts were evaluated as part of the Supplemental EIR, which was determined to result in less-than-significant environmental effects (RMWD 2010a). Cumming Ranch was included as part of

the Supplemental EIR's cumulative project list. For these reasons, the SMWWTP expansion needed to serve Cumming Ranch would not create unmitigated significant impacts.

It is anticipated that the SMWWTP improvements would be at the operational and capacity level necessary to serve the Cumming Ranch project within 5 years (RMWD 2009b) or that lesser improvements that would be sufficient to serve the project would be available in that time frame (RMWD 2012). As explained above, the SMWWTP improvements have been analyzed in RMWD's Supplemental EIR, and all significant impacts would be mitigated. However, RMWD may determine that lesser improvements would be sufficient to serve Cumming Ranch. Since the lesser improvements have not been identified, it is not possible to analyze their potential impact, but RMWD would be required to comply with CEQA before approving such improvements. Therefore, the project would not cause a significant impact under Guideline 1 above related to sewer service and treatment. However, since the needed infrastructure is not yet in place, Guideline 2 would be exceeded and a ***significant impact*** would result (**Impact PS-3**).

Recreational Facilities

As discussed in Section 3.6.1, the Ramona community currently has 218 acres of local park land and 79 acres of regional park land. The County's General Plan Recreation Element recommends the standard of 15 acres of local park land and 15 acres of regional park land per 1,000 persons (County of San Diego 1993). Based on this standard and the year 2000 population for the Ramona Community Planning Area, Ramona should ultimately have 622 acres of local park land and 622 acres of regional park land. The Cumming Ranch project would add an additional 375 persons to the Ramona community and would generate the need for an additional 5.7 acres of local park land and 5.7 acres of regional park land. To manage the County's park land deficiency, the County has established the Park Land Dedication Ordinance. As stated in Section 810.104–114 of the San Diego Code of Regulatory Ordinances (County of San Diego 1995), and as a condition of approval of any development as defined in Section 810.102(a), the applicant shall dedicate land or pay fees in lieu thereof, or do a combination of both, for neighborhood and community park or recreational purposes to serve future residents of the development. The payment of fees only applies to developments of 50 parcels or less. For developments containing more than 50 parcels, the approving body would determine whether to require dedication of land, payment of a fee in lieu thereof, or a combination of both. In making such determination, the approving body would consider the following factors:

(a) Conformity of lands offered for dedication with the Recreation Element of the General Plan.

(b) The topography, soils, soil stability, drainage, access, location, and general utility of land in the development available for dedication.

(c) The size and shape of the development and land available for dedication.

(d) The amount, usability, and location of publicly owned property available for combination with dedicated lands in the formation of local park and recreation facilities.

(e) Any additional recreation facilities that are to be privately owned and maintained by future residents of the development.

Because the Cumming Ranch project includes the development of approximately 125 parcels, the County has the discretion to determine the appropriate means of meeting the project's park and recreational demand. At the time of filing a TM, the County will require the applicant to indicate a preference whether to dedicate land for park or recreation purposes or to pay a fee in lieu thereof, or do a combination of both (County of San Diego 1995). At this time, the Cumming Ranch project applicant has submitted a TM and applications for approval, and has chosen to pay fees in lieu of dedicating park lands. Conformity with the Park Land Dedication Ordinance would meet the proposed project's fair-share allotment to ensure that recreational needs for the project are being met. Additional recreational opportunities would be provided by the Cumming Ranch project and include community trails. This community trails system would be designed for use by both pedestrians and equestrians. Further discussion of the proposed trail system is provided in Section 1.1.3. The project was designed with large lots, allowing for recreation and open space within the homeowner's private property. The large lots would generally reduce the demand for local and regional parks resulting from implementation of this project. For these reasons, a ***less-than-significant*** impact to recreational facilities would result per Guideline 3.

Solid Waste

The Cumming Ranch project would result in development of 125 residential units on the project site. The placement of residential units on the project site would result in the generation of household solid waste. The estimated generation rate per person in unincorporated San Diego County is 2.6 tons per year (DeBraal 2005). Therefore, based on 375 persons, the proposed project would be expected to generate approximately 975 tons of solid waste per year. Because recycling is mandated by the Solid Waste Ordinance in the County, a substantial portion of the waste generated by the proposed project would be diverted away from the local landfills and recycled. With a recycling rate of 50% (DeBraal 2005), the amount of solid waste entering the landfill from the proposed project would be approximately 488 tons per year.

The increase of 488 tons of solid waste per year could be accommodated by the Sycamore Landfill, and would not represent a significant impact to landfill capacities. The landfill has anticipated growth in the region and, based on this growth, landfill capacity is projected to meet the region's needs through 2031. The proposed development is a smaller project than anticipated in the planning documents for the area, such as the Ramona Community Plan. For this reason, the development would not tax the landfill and solid waste disposal system beyond that anticipated with regional growth. Given that the Sycamore Landfill has the capacity to accommodate the solid waste generated by the project, the project would not necessitate a landfill expansion, and a ***less-than-significant*** impact would result, as none of the Guidelines would be exceeded.

3.6.4 Cumulative Impact Analysis

The study area for the public services and recreation cumulative impact analysis includes the Ramona Community Planning Area. The Ramona Community Planning Area was deemed appropriate for the cumulative study area because the services analyzed in this section are provided on a local level, not a regional level. For example, fire and police services are provided to the Ramona community by the local fire department and Sheriff's station, the local school district serves the Ramona area, and the local water district provides water and sewer service. Therefore, the local nature of public services and recreation facilities makes the Ramona Community Planning Area the appropriate study area for this cumulative analysis.

Fire Protection

Assuming an average household size of three people (SANDAG 2003), the existing population within the cumulative study area is estimated as 7,333 households. With the assumed level of development under the cumulative forecast scenario, approximately 1,000 residential units would be built. This growth in residential units would result in a more than 20% increase in the number of homes and businesses that would need fire protection in the Ramona area. As previously noted, this area is currently served by three fire stations. It is reasonably assumed that a 20% growth within the RFD/CAL FIRE boundaries would necessitate construction of additional fire protection facilities.

RFD has indicated that growth in the Ramona area could reduce their capability to effectively respond to calls from the Highland Valley area (Delgado 2004). With increased development in the region, response times could increase. Additional infrastructure is anticipated, but RFD has not identified any specific new facilities or alterations to existing facilities that would be needed due to the proposed project in combination with the other cumulative projects. Therefore, it is

not possible to analyze potential impacts from future new or expanded fire facilities at this time. The project would not cause a significant impact under Guideline 1 above.

However, the RMWD/RFD has indicated that it is in an extreme budget crisis and would not be able to adequately fund facilities, equipment, and staff to serve the project and continue to maintain an appropriate level of service and protection for the rest of the community (RMWD 2010b, 2011a). Guideline of Significance Number 2 is exceeded based on inadequate facilities in the cumulative scenario. For this reason, the project would result in a ***potentially significant*** contribution to cumulative fire service demands per Guideline 2 (**Impact PS-4**).

Law Enforcement

As stated above, the growth anticipated for the cumulative study area (Ramona Community Planning Area) would result in a more than 20% increase in the number of homes and businesses that would need law enforcement. However, it is reasonable to assume that the 20% growth anticipated within the Sheriff's Department boundaries could necessitate the need for additional law enforcement officers and vehicles that would be procured by property taxes.

A Law Enforcement Facilities Master Plan was prepared in 2005 that recognized the need to replace the existing substation by 2020 to accommodate projected growth in the service area population. It is unknown where this facility will be constructed, but it could be located adjacent to the existing substation, could include the former County-owned Library space or could be on another site acquired by the County. In the interim, the Sheriff's Department has expanded into the existing Library building. The Sheriff has not identified any specific new facilities or alterations to existing facilities that would be needed due to the proposed project in combination with the other cumulative projects. Therefore, it is not possible to analyze potential impacts from future new or expanded Sheriff's facilities at this time. Because There may be unspecified environmental impacts from the Sheriff has already expanded into the former County Library space, there would be no environmental impacts as a result of exacerbating the performance levels of existing facilities, such that a significant adverse environmental effect would not result in the cumulative scenario. For this reason, none of the Guidelines would be exceeded, and the project's contribution to this potential cumulative impact is considered ***less than significant.***

Schools

Cumulative growth in the cumulative study area would necessitate additional RUSD facilities. Multiple expansions and a new school are currently in the planning process; however, the exact details of RUSD expansions are not known at this time. The expansion of facilities on existing

RUSD property would not be expected to cause significant impacts to the physical environment, as the facilities would be developed on previously disturbed sites. Furthermore, RUSD would be required to conduct CEQA review prior to the construction of expanded or new facilities. A portion of the cost of these facilities would be borne by the Cumming Ranch project and other projects in the region through the collection of school fees. Although these fees are often insufficient to fund 100% of new school facility construction and operation, the California State Legislature has declared that the school impact fee is full and adequate mitigation under CEQA. Under California Government Code Section 65996, the County is limited to charging the statutorily created fee to offset impacts to local school districts generated by proposed projects. Section 95996 does not provide for remediation of existing deficiencies in school services. As described above, plans for expansions of facilities of elementary through high school are currently ongoing. For these reasons, none of the Guidelines would be exceeded, and the project's contribution to potential cumulative school facility impacts is considered ***less than significant***.

Water Supply and Service

In the 2005 Urban Water Management Plan (UWMP), RMWD identified future treated water demand based on cumulative growth within its service area through the year 2025, shown as the total projected demand numbers in Table 3.6-1. It is projected that demand for treated water will increase by approximately 472 AF/YR every 5 years, for a total increased demand of 1,886 AF/YR between 2005 and 2025 (RMWD 2005). Similar results were identified in the 2010 UWMP with an increase of 448 AF/YR for 2005 to 2035 (RMWD 2011).

Cumulative development in the cumulative study area includes approximately 1,000 residential units and 230,000 square feet of additional commercial/retail development. This increase in development, along with the Cumming Ranch project, would result in a greater demand on the amount of water currently available and supplied by RMWD. RMWD has initiated improvements to expand its water supply services to adequately accommodate the planned future development in its service area, including the Cumming Ranch project. The current cumulative water demand would be within that anticipated and planned for by RMWD, and would not require the installation of additional facilities beyond those already planned by RMWD. Due to ongoing cumulative growth in the Ramona Community Planning Area, it is likely that the water service expansion planned for by RMWD would be necessary to meet the growing demand, regardless of the Cumming Ranch project. It is possible that new water supplies or conveyance facilities would be required to serve additional development, and could result in environmental impacts. RMWD as the lead agency would be responsible for environmental assessment of potential impacts associated with the planned water service expansion under CEQA, and providing mitigation to

reduce those impacts. However, the planned expansion of RMWD water services is currently ongoing and projects requesting service may contribute to the need for infrastructure that is planned but not yet in place. Therefore, a ***cumulatively significant impact*** would result, per Guidelines 1 and 2 (**Impact PS-5**).

Sewer Service and Treatment

For this EIR, a cumulative list was compiled to estimate planned development in the area. This listing (provided in Subchapter 1.6) includes approximately 1,000 residential units and 230,000 square feet of additional commercial/retail development for which the County has received permit applications. As described above, in response to the anticipated growth in the area, RMWD is planning major improvements and expansion to the SMWWTP facility, including its spray fields. These improvements and expansions are expected to serve an additional 1,216 EDUs beyond those customers currently served (RMWD 2010a). This additional service level would provide adequate service availability for the known cumulative projects, including Cumming Ranch. Due to ongoing cumulative growth in the Ramona Community Planning Area, it is likely that the wastewater service expansion planned for by RMWD would be necessary to meet the growing demand, regardless of the Cumming Ranch project.

These expansions would be required to be completed to address the cumulative demands of the proposed project in combination with other anticipated projects in the area. As lead agency, RMWD completed a Supplemental EIR per CEQA to consider whether the expansions would cause any significant impacts to the physical environment and to provide mitigation for identified impacts. As described above, the Supplemental EIR found that the environmental impacts anticipated with implementation of improvements and expansions to the SMWWTP and spray fields could be mitigated to less than significant and therefore, the improvements needed to serve Cumming Ranch and other cumulative projects would not create an unmitigated significant impacts. Consequently, there would not be a significant cumulative effect under Guideline 1. Cumming Ranch was included in the list of cumulative projects evaluated as part of the Supplemental EIR (RMWD 2010a).

However, the improvement and expansion of sewer treatment services currently being undertaken by RMWD are not yet complete. If the Cumming Ranch project, in combination with other cumulative projects, were to require service prior to completion of the RMWD sewer service expansion and cause demand in excess of available service, a ***cumulatively significant impact*** would result per Guideline 2 (**Impact PS-6**).

Recreational Facilities

Assuming an average household size of three people (SANDAG 2003) and an assumed level of development under the cumulative projects scenario of approximately 1,000 residential units, the cumulative-plus-project population would be 3,375 persons. Based on the standards set forth in the County's General Plan Recreational Element as identified in Section 3.6.3, an additional 50 acres of local park land and 50 acres of regional park land would be required to meet the recreational needs of the identified cumulative projects and the Cumming Ranch project. The Cumming Ranch project and other projects in the region would contribute to the Park Land Dedication Ordinance by either dedicating land or paying fees in lieu of dedication, thereby addressing the additional demand for parkland. In addition, the Cumming Ranch project includes funding and installation of community trails and pathways. Also, the project would include large lots for residents to recreate within their own property, which would reduce dependence on community recreation facilities. For these reasons, Guideline 3 would not be exceeded, and this would be a ***less-than-significant*** cumulative impact.

Solid Waste

Cumulative growth in the Ramona area, along with the proposed project, would add to the waste stream being disposed of at the Ramona Landfill. The landfill has a capacity that is projected to meet the region's needs through 2014. It is not anticipated that growth in the area would require an early closure of the landfill and result in secondary environmental impacts associated with a new disposal location. In addition, the Cumming Ranch project is smaller than what was anticipated in the Ramona Community Plan and, thus, would contribute less solid waste than was accounted for in the regional plans. Therefore, none of the Guidelines would be exceeded and a ***less-than-significant*** cumulative impact would result.

3.6.5 Mitigation Measures

Mitigation Measure M-PS-1 Fire Protection Service

The Cumming Ranch project shall participate in a Community Facilities District as required by the Ramona Fire Prevention Bureau. The project developer shall be required to pay all fees and meet all requirements of the Community Facilities District to the satisfaction of RMWD.

Mitigation Measure M-PS-2 Water Conveyance, Storage, and Treatment

County approval of the Final Map for the Cumming Ranch project or permits that allow for ground disturbance shall not occur until after RMWD has provided a commitment of water

supply to serve the project. The project developer shall be required to pay all service fees as determined by RMWD.

Mitigation Measure M-PS-3 Sewer Service and Treatment

County approval of the Final Map for the Cumming Ranch project or permits that allow for ground disturbance shall not occur until after RMWD has provided a commitment of wastewater treatment capacity to serve the project. The project developer shall be required to pay all service fees as determined by RMWD.

Mitigation Measure M-PS-4 Cumulative Fire Protection Service

The Cumming Ranch project shall participate in a Community Facilities District as required by the Ramona Fire Prevention Bureau. The project developer shall be required to pay all fees and meet all requirements of the Community Facilities District to the satisfaction of RMWD.

Mitigation Measure M-PS-5 Cumulative Water Conveyance, Storage, and Treatment

County approval of the Final Map for the Cumming Ranch project or permits that allow for ground disturbance shall not occur until after RMWD has provided a commitment of adequate water supply to serve the project. The project developer shall be required to pay all service fees as determined by RMWD.

Mitigation Measure M-PS-6 Cumulative Sewer Service and Treatment

County approval of the Final Map for the Cumming Ranch project or permits that allow for ground disturbance shall not occur until after RMWD has provided a commitment of adequate wastewater treatment capacity to serve the project. The project developer shall be required to pay all service fees as determined by RMWD.

3.6.6 Conclusions

Potential environmental impacts, both direct and cumulative, to public services (i.e., law enforcement, schools, recreational facilities, and solid waste service) would not be significant because implementation of the project would not require the expansion of existing facilities or the construction of new facilities that would result in unmitigated significant adverse environmental impacts.

Because of severe budget constraints, the RMWD/RFD would not be able to adequately serve the Cumming Ranch project and continue providing adequate service and protection to the rest of the community (**Impacts PS-1** and **-4**). The project would be required to participate in a Community Facilities District (CFD) that would facilitate adequate funding for fire protection. The project would pay all associated fees and meet all responsibilities of the Community Facilities District to ensure appropriate funds are available to maintain fire protection services for the project, cumulative projects, and the community. Participation in the CFD reduces the project's contribution to the cumulative fire protection service and performance impacts to less than considerable.

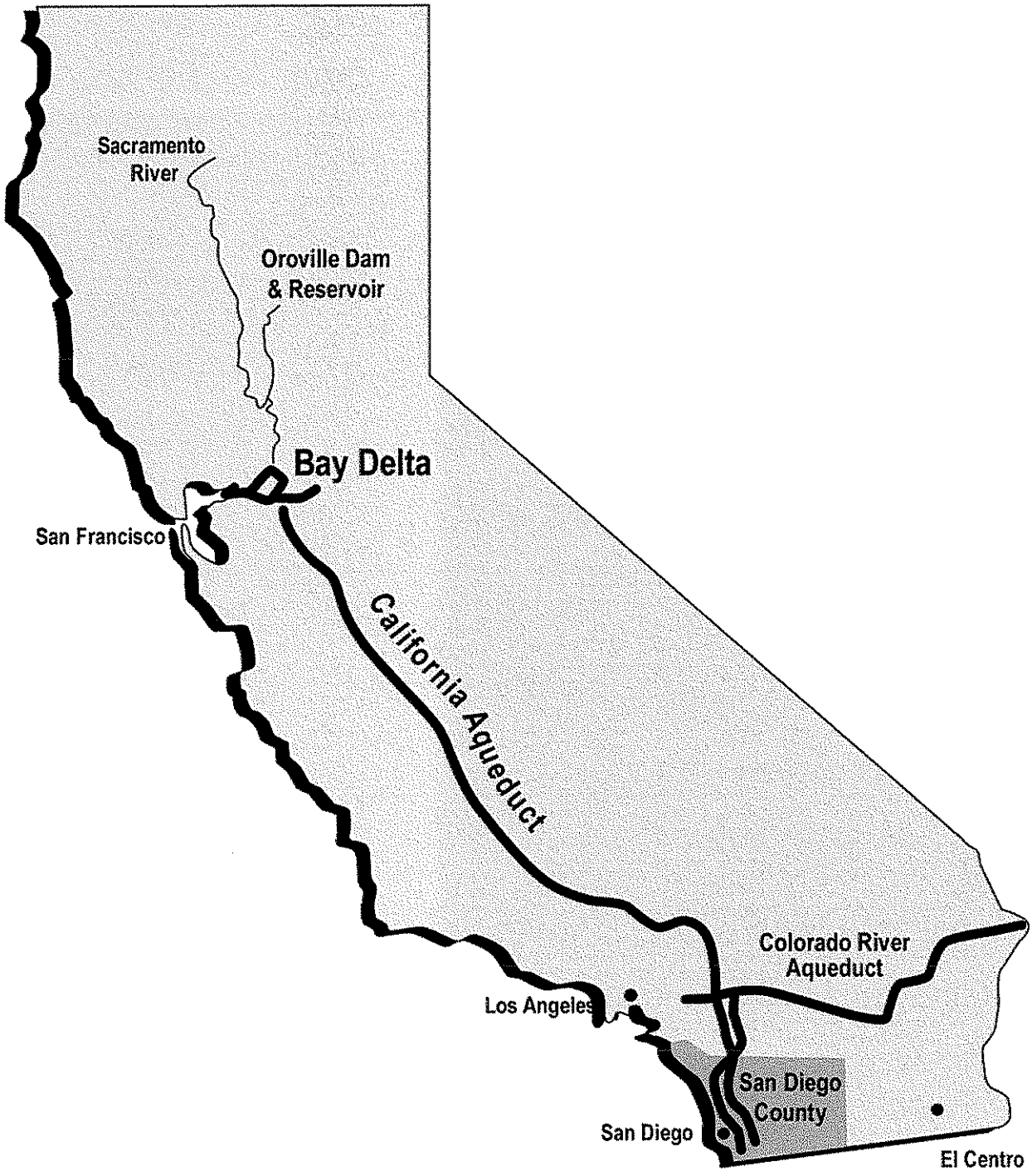
RMWD is currently planning improvements and expansions of its facilities that provide water and sewer services to the general area in which the project is located. Planning has begun for new water storage facilities that would improve and expand services available within the Downtown Operational Storage Zone. RMWD recently completed its purchase of 285 acres used for spray field operations that were formerly leased, which adds more certainty to the availability of the land for long-term use. Design contracts have been completed for increasing the wastewater treatment capacity of the SMWWTP from 1.0 MGD to 1.47 MGD to provide adequate service to existing and future RMWD clients, including the Cumming Ranch project. The Final Supplemental EIR (SCH #2008121130) for RMWD's sewer expansion was certified on May 25, 2010 (RMWD 2010a).

Because the above-mentioned projects are not completed at this time, the proposed project could cause a significant direct and cumulative impact if the project were operational and water and wastewater services were required prior to the planned RMWD improvements (**Impacts PS-2, 3, -5,** and **-6**).

RMWD has indicated that upgrades specified in the SMWWTP Project (2010 FSEIR) may or may not be necessary to serve the Cumming Ranch project, and smaller, incremental improvements may suffice (Ricardo Soto, Civil Engineer, December 13, 2012). In any event, the District has determined that facilities to serve the project are reasonably expected to be available in 5-years even though, at this time, the District is not certain what the specific improvements will be. The Tentative Map will be conditioned to require the project applicant to obtain a commitment of sewer availability from RMWD and, thereby confirm that the necessary sewer service facilities are in place and operational, prior to Final Map approval. Such a condition is reasonable given that (a) RMWD reasonably expects the necessary sewer service facilities to be available within five years; (b) RMWD has options for serving the project; (c) the timing for construction of the RMWD infrastructure improvements are uncertain; and (d) that if the

project's tentative map is approved, it may be granted automatic extensions to extend its life beyond 5 years before the final map must be processed.

The project's direct water and sewer service and performance impact would be mitigated to less than significant and the project's contribution to cumulative water and sewer service and performance impacts would be less than considerable by the implementing mitigation to receive a service commitment, thereby verifying that improvements would be in place and adequate service would be available, prior to approval of the final map for the project. This timing would ensure that the project would not require water or sewer service prior to adequate availability, and would allow RMWD time for planning and implementation of improvements to meet cumulative project demands.



Source: Ramona Municipal Water District 2005 Urban Water Management Plan

No Scale

Figure 3.6-1
Water Conveyance Facilities Serving San Diego County

Table 3.6-1
RMWD Projected Available Water Supply and Demand during Normal Year for Period 2005 - 2025 (AF/YR)

Supply Source	2005	2010	2015	2020	2025
Treated Water					
SDCWA Imported Water[1]	20,842	20,842	20,842	20,842	20,842
Bargar Water Treatment Plant (Sutherland Lake)	2,500	2,500	2,500	2,500	2,500
Wells	0	0	0	0	0
Total Available Treated	**23,342**	**23,342**	**23,342**	**23,342**	**23,342**
Total Projected Demand	**7,459**	**7,931**	**8,401**	**8,873**	**9,345**
Untreated Water					
SDCWA Imported Water	9,636	9,636	9,636	9,636	9,636
Wells	200	200	200	200	200
Total Available Untreated	**9,836**	**9,836**	**9,836**	**9,836**	**9,836**
Total Projected Demand	**3,782**	**3,785**	**3,789**	**3,792**	**3,795**
Recycled Water	**880**	**1,480**	**1,480**	**1,480**	**1,480**

[1] Capacity that can be delivered through Poway PS and PL.
Source: RMWD 2005

Table 3.6-2
SDCWA Projected Normal Water Year Supply and Demand (AF/YR)

Supply Source	2010	2015	2020	2025	2030
SDCWA Supplies					
Imperial Irrigation District Water Transfer	70,000	100,000	190,000	200,000	200,000
All-American and Coachella Canals Lining Projects	77,700	77,000	77,000	77,000	77,000
Subtotal	**147,700**	**177,700**	**267,700**	**277,700**	**277,700**
Member Agencies Supplies					
Surface Water	59,649	59,649	59,649	59,649	59,649
Water Recycling	33,668	40,662	45,548	46,492	47,584
Groundwater	17,175	18,945	19,775	19,775	19,775
Groundwater Recovery	11,400	11,400	11,400	11,400	11,400
Seawater Desalination	0	34,689	34,064	37,754	40,000
Subtotal	**121,892**	**165,345**	**172,436**	**175,070**	**178,408**
Metropolitan Water District Supplies	**445,858**	**399,855**	**311,374**	**342,870**	**372,922**
Total Projected Supplies	**715,450**	**742,900**	**771,510**	**795,640**	**829,030**
Total Estimated Demands with Conservation	**715,450**	**742,900**	**771,510**	**795,640**	**829,030**

Source: SDCWA 2007

Table 3.6-3
Projected Water Demands for the Cumming Ranch Project

Number of Units	125 EDUs
Unit Demand	554 gpd/EDU
Average Daily Demand	69,250 gpd
Maximum Daily Demand (Peak Factor 3.0)	207,750 gpd
Total Annual Projected Water Demand	78 AF/YR

EDU = equivalent dwelling unit
gpd = gallons per day
AF/YR = acre-feet per year
Source: RMWD 2009b

CHAPTER 4.0
ENVIRONMENTAL EFFECTS FOUND NOT TO BE SIGNIFICANT

As allowed by Section 15063(c) of the CEQA Guidelines, issues that were identified as not significant or less than significant for this project were not addressed in detail in the previous chapters. The determination of less than significant or not significant for some issue areas may have resulted from either the EIR analysis or during preparation of the Initial Study. These issue areas and the reasons for these conclusions are provided in this chapter.

4.1 Effects Found Not Significant as Part of the EIR Process

Through the EIR analysis process, eight issue areas were found to have no impacts or less-than-significant impacts: Hydrology and Water Quality, Hazards and Hazardous Materials, Agricultural Resources, Land Use and Planning, Population and Housing (excluding Growth Inducement), Mineral Resources, Geology and Soils, and Air Quality. The rationale for these conclusions is outlined below.

4.1.1 Hydrology and Water Quality

This section describes the existing hydrology and water quality conditions at the Cumming Ranch site, and provides an analysis of the potential environmental effects related to flooding, drainage, groundwater quality, and surface water quality that may occur with implementation of the proposed project. This section is based on the Hydrology and Drainage Study (Snipes-Dye 2010a) and the Storm Water Management Plan (Snipes-Dye 2010b). Impacts of the proposed project on existing and future water supply sources and wastewater treatment are described and analyzed in Subchapter 3.6, Public Services and Recreation.

4.1.1.1 Existing Conditions

Regional Drainage

The proposed project is located within the San Dieguito Hydrologic Unit (Unit 5.00) of the San Diego Region. This unit is defined in the Water Quality Control Plan for the San Diego Basin (California RWQCB 1994), referred to as the Basin Plan. As shown in Figure 4-1, the San Dieguito Hydrologic Unit is a rectangular-shaped area of about 350 square miles extending from Santa Ysabel to Solana Beach and Del Mar. The majority of this watershed is located within the unincorporated area of San Diego County and includes the San Dieguito River and its tributaries,

Santa Ysabel Creek and Santa Maria Creek. There are also three reservoirs located within the San Dieguito Hydrologic Unit: Lake Hodges, Sutherland, and San Dieguito reservoirs. The San Dieguito Slough is situated at the mouth of the San Dieguito River. This hydrologic unit is generally bordered by the San Luis Rey watershed to the northeast, Carlsbad watershed to the northwest, San Diego River watershed to the southeast, and Peñasquitos watershed to the southwest. Nearly half of the vacant land in this watershed is planned for future development, primarily residential use. The San Dieguito Hydrologic Unit consists of five hydrologic areas. The project site is located in the Santa Maria Valley Hydrologic Area and, specifically, within the Ramona Hydrologic Subarea.

Site Topography and Drainage

The majority of the project site has gently rolling topography, with the dominant feature being the generally east-west-trending ridgeline. The topography of Area A consists of rolling uplands interspersed with rocky outcrops and drainages, with a ridgeline of steeper hillsides located in the northeastern portion. Elevations range from 1,368 feet to 1,576 feet. Highland Valley Road and SR 67 are located in the southern portion of the property. The topography in Area B consists mostly of a wide-open, moderately level plain area extending from south of Etcheverry Creek north to Santa Maria Creek. Elevations range from 1,359 feet to 1,392 feet. Area C consists of creek area, wetlands and shallow drainage areas (vernal swales), and nonnative grasslands, and a clustering of large boulders and rock outcroppings along the eastern boundary. Santa Maria Creek traverses through portions of Areas B and C. Elevations in the northern area range from 1,365 feet to 1,400 feet, with the higher elevations being in the north along Ramona Airport Road. Twenty-two acres of Area C are protected by conservation easements that form the Ramona Vernal Pool Preserve.

The primary drainages within the project site are Santa Maria Creek located in the northern portion of the site (Areas B and C), and Etcheverry Creek through the central portion of the site (Area B). These two creeks drain from east to west and eventually converge just west of the property boundary. These features are shown in Figure 4-2. Santa Maria and Etcheverry Creeks are not characterized by trees or lush vegetation. Two smaller unnamed drainages occur in the southern portion of the site and cross under Highland Valley Road, merging into a single unnamed drainage course. The flow continues to the north until it merges with Etcheverry Creek and ultimately joins Santa Maria Creek.

The primary drainage areas at the project site can be divided into three general basin areas. The first basin is Santa Maria Creek Basin, which flows through Area C and the northern portion of

Area B. The second basin is Etcheverry Creek Basin, which flows through Area B. These basins are outside of the portions of the project site that are proposed for development.

The third basin, the Cumming Ranch Basin, encompasses the vast majority of Area A. The top of this basin is located at SR 67 and Archie Moore Road. The drainage in this basin flows in an easterly direction parallel with SR 67, and then northerly to meet the project site in the southwest corner of the project boundary. The flow continues northwesterly and northerly through the site in an unnamed swale until it reaches the project boundary. This basin encompasses 2.6 square miles and has a watershed length of 3.32 miles. The average slope for this basin is approximately 103 feet per mile. The peak runoff for this basin as it discharges is 3,500 cubic feet per second.

Water Quality

Runoff is a term used to describe any water that drains or runs off of a defined land area into a waterway. Runoff can be the result of rain, in which case it is also sometimes referred to as storm water. Runoff can also result from various other sources or activities such as irrigation, hosing down of areas, errant wash water from cleaning, leaks in pipes, and air conditioner condensation. General hydrologic characteristics, land uses, and activities that involve pollutants have the greatest influence on the water quality runoff from a given area. The project site includes agricultural lands with historic and current agricultural activities in Areas A and B. These activities include cattle grazing and dry-land farming of oat-hay. Area C is fenced to prevent any cattle grazing or other agricultural activity within the vicinity of the vernal pools.

Receiving Waters

Receiving waters is a general term typically used to describe any water body, such as a creek, river, lake, bay, or ocean, that receives runoff. In the context of the proposed project, receiving waters refer to those water bodies that would receive runoff from the Cumming Ranch project. The potential receiving waters for the proposed project include Santa Maria Creek and its tributaries located within or adjacent to the project site. These waters flow into other water bodies before reaching the Pacific Ocean. Each of the receiving waters is described below. The beneficial uses designated for each of the receiving waters by the RWQCB are provided in Table 4-1. In general, beneficial uses are those uses, users, or activities that benefit from the presence of the water and could be adversely impacted if water quality were degraded. The definitions for the beneficial uses are provided in Table 4-2.

Etcheverry Creek

Etcheverry Creek, the southern tributary of Santa Maria Creek, is located within Area B. Etcheverry Creek merges with Santa Maria Creek just north of Area A and west of Area B. Runoff from the project site discharges into Etcheverry Creek from an unnamed creek through the project site just north of Area A before connecting with Santa Maria Creek.

Santa Maria Creek

Santa Maria Creek is located within portions of Areas B and C. Runoff from the project site discharges to Santa Maria Creek. However, there is no direct discharge into Santa Maria Creek from the project site. Santa Maria Creek flows west to meet with Santa Ysabel Creek.

Santa Ysabel Creek

Santa Ysabel Creek is located northwest of the project site in the San Pasqual Valley and receives water from various canyons and water bodies within the watershed, including Santa Maria Creek. Santa Ysabel Creek continues to flow west to discharge into Lake Hodges and is part of the San Dieguito River Park.

Lake Hodges

Lake Hodges is located in the city of Escondido, north of the community of Rancho Bernardo. Santa Ysabel Creek drains into Lake Hodges, which flows into the San Dieguito River. This reservoir supports a variety of recreational activities. Lake Hodges is a part of the San Dieguito River Park. When full, the reservoir at Lake Hodges has 1,234 surface acres, a maximum water depth of 115 feet, and 27 shoreline miles.

San Dieguito River

The San Dieguito River receives water from Lake Hodges and flows into the San Dieguito Lagoon. The San Dieguito River is a part of the San Dieguito River Park and stretches west of Lake Hodges to the San Dieguito Lagoon and the Pacific Ocean.

San Dieguito Lagoon

The San Dieguito Lagoon is located in the city of Del Mar. It is not identified as a California Critical Coastal Area, designated Marine Managed Area, or Storm Water Quality Protection

Area (formerly Areas of Special Biological Significance) according to the California Coastal Commission. The San Dieguito Lagoon receives water from the San Dieguito River and flows directly into the Pacific Ocean.

Pacific Ocean

The Pacific Ocean borders the entire coast of California and is the ultimate or final receiving water for all Cumming Ranch runoff. The Pacific Ocean at the mouth of the San Dieguito River is listed as a 303(d) impaired water body for elevated coliform bacteria. Pollutants and oxygen depletion are particularly sensitive to this area due to restricted and intermittent tidal flushing.

Applicable Regulations and Policies

Several federal, state, and local agency databases have been established to regulate water quality. Federal databases are regulated by USEPA, state databases are regulated by State of California agencies, and local databases are regulated by County agencies.

Clean Water Act

The CWA was designed to restore and maintain the chemical, physical, and biological integrity of the waters in the United States. The CWA also directs states to establish water quality standards for all waters of the U.S. and to review and update such standards on a triennial basis. Other provisions of the CWA related to basin planning include Section 208, which authorizes the preparation of waste treatment management plans, and Section 319, which mandates specific actions for the control of pollution from nonpoint sources. USEPA has delegated responsibility for implementing portions of the CWA to the State Water Resources Control Board (SWRCB) and the RWQCBs, including water quality control planning and programs, such as the National Pollutant Discharge Elimination System (NPDES) program. The NPDES program is a set of permits designed to implement the CWA; these permits apply to various activities that generate pollutants with potential to impact water quality.

Section 303 of the CWA requires states to adopt water quality standards for all surface waters of the U.S. Section 304(a) requires USEPA to publish water quality criteria that accurately reflect the latest scientific knowledge on the kind and extent of all effects on health and welfare that may be expected from the presence of pollutants in water. Where multiple uses exist, water quality standards must protect the most sensitive use. Water quality standards are typically numeric, although narrative criteria based on biomonitoring methods may be employed where numerical standards cannot be established or where they are needed to supplement numerical

standards. Section 303(c)(2)(b) of the CWA requires states to adopt numerical water quality standards for toxic pollutants for which USEPA has published water quality criteria and which reasonably could be expected to interfere with designated uses of a water body. The regulations of the CWA are applicable to the project because new impervious surfaces would be created with development of the project that could create runoff and storm water.

Porter-Cologne Water Quality Control Act

The Porter-Cologne Water Quality Control Act authorizes the SWRCB to adopt, review, and revise policies for all waters of the state (including both surface and groundwater), and directs the RWQCB to develop regional Basin Plans. Section 13170 of the California Water Code also authorizes the SWRCB to adopt water quality control plans on its own initiative. The Water Quality Control Plan for the San Diego Basin (9) is designed to preserve and enhance the quality of water resources in the San Diego Region for the benefit of present and future generations. The purpose of the plan is to designate beneficial uses of the region's surface and groundwater, designate water quality objectives for the reasonable protection of those uses, and establish an implementation plan to achieve the objectives.

All projects resulting in discharges, whether to land or water, are subject to Section 13263 of the California Water Code and are required to obtain approval of Waste Discharge Requirements (WDRs) from the RWQCBs. Land- and groundwater-related WDRs (i.e., non-NPDES WDRs) regulate discharges of process and wash-down wastewater and privately or publicly treated domestic wastewater. WDRs for discharges to surface waters also serve as NPDES permits. This regulation is applicable to the proposed project due to new impervious surfaces and associated surface water runoff, as well as a new source of domestic wastewater.

Local Regulations

County of San Diego Watershed Protection, Storm Water Management, and Discharge Control Ordinance

The County of San Diego Watershed Protection, Storm Water Management, and Discharge Control Ordinance is designed to protect the health, safety, and general welfare of County residents; protect water resources and improve water quality; cause the use of management practices by the County and its citizens that will reduce the adverse effects of polluted runoff discharges on waters of the state; secure benefits from the use of storm water as a resource; and ensure that the County is compliant with applicable state and federal laws. This ordinance applies to the project because of the creation of impervious surfaces with the residential

development that could impact the amount of storm water generated on the project site. This ordinance seeks to promote these purposes with the following:

1. Prohibiting polluted non-storm-water discharges to the storm water conveyance system.
2. Establishing minimum requirements for storm water management, including source control requirements, to prevent and reduce pollution.
3. Establishing requirements for development-project site design to reduce storm water pollution and erosion.
4. Establishing requirements for the management of storm water flows from development projects, both to prevent erosion and to protect and enhance existing water-dependent habitats.
5. Establishing standards for the use of offsite facilities for storm water management to supplement onsite practices at new development sites.
6. Establishing notice procedures and standards for adjusting storm water and non-storm-water management requirements where necessary.

County of San Diego Grading Ordinance

The County of San Diego Grading Ordinance is designed to protect water resources and water quality, cause the use of management practices by the County and its citizens that will reduce the adverse effects of polluted runoff discharges on waters of the state, and ensure that the County is compliant with applicable state and federal laws. Although the proposed project was designed to use minimal grading, the grading ordinance is still applicable because some grading would occur on the project site for development. This ordinance seeks to promote these purposes with the following:

1. Requiring the preparation and process of a grading plan for site grading and proposed storm drains.
2. Requiring hydrology and hydraulic calculations for the proposed storm drains.
3. Sizing rock riprap energy dissipators for any storm drains to reduce velocities to nonerosive velocities.
4. Requiring a SWPPP for any ground disturbance greater than 1 acre and a Notice of Intent to be filed with the RWQCB.

5. Preparing erosion-control plans to show appropriate BMPs to be installed and maintained during the course of construction as listed in the Storm Water Management Plan.

6. Preparing landscape and irrigation plans for all slopes greater than 15 feet high that will be a part of the grading plan set.

7. Submitting a Storm Water Management Plan and Storm Water Maintenance Plan for review by the County.

8. Issuing a grading permit prior to any site clearing or grading.

9. Requiring the establishment of vegetation on all slopes greater than 3 feet high before grading is signed off to prevent slope erosion after grading is complete.

10. Requiring weekly site visits by the civil engineer of record during the course of construction to observe the BMPs in place and make any recommendations for upgrade and file a report with the County stating the observations and the progress of grading.

11. Requiring the preparation of a site erosion-control plan as maintained by the general contractor (grading contractor) during the grading operations.

12. Installing postconstruction BMPs prior to the acceptance of the grading by the County.

4.1.1.2 Guidelines for the Determination of Significance

The guidelines for determination of significance for hydrology and water quality are primarily based on the CEQA Guidelines, and were specified to include compliance with local regulations. The project would have a significant adverse effect on hydrology and water quality if the project would do any of the following:

1. Not conform to the goals and requirements of the applicable federal, state, or local regulations, including, but not limited to, the CWA, the Porter-Cologne Water Quality Act, County of San Diego Revised Grading Ordinance, County of San Diego Watershed Protection Ordinance, Storm Water Management Plan, and/or Discharge Control Ordinance by:

    a. contributing direct additional pollutants for which the receiving water body is already impaired as listed on the CWA Section 303(d) list;

    b. creating direct substantial new sources of polluted runoff, including the addition of impervious surfaces that would result in increased runoff of polluted storm water;

c. causing or contributing to the exceedance of applicable state or local surface or groundwater receiving water quality objectives or degradation of beneficial uses.

2. Directly alter any drainage in a manner that would result in substantial erosion or siltation onsite or offsite or result in flooding onsite or offsite by:

   a. placing housing within a 100-year flood hazard area;

   b. placing structures that would impede or redirect flood flows within a 100-year flood hazard area;

   c. exposing people or structures to a significant risk of loss, injury, or death involving flooding directly or cumulatively.

3. Create or contribute runoff water that would exceed the capacity of existing or planned storm water drainage systems directly or cumulatively.

4. Significantly contribute to a cumulatively considerable increase in storm water runoff originating from the project site.

Consideration of these thresholds is provided in the following section under three generalized headings: drainage and hydrology, water quality, and flooding.

4.1.1.3 Analysis of Project Effects and Determination of Significant Impact

Drainage and Hydrology

The project site is 682.6 acres, with the entire 2.6-square-mile drainage basin through the site having an approximate peak flow rate of 3,500 cubic feet per second for the 100-year storm event. Runoff rates were based on designated curve numbers from the San Diego County Hydrology Manual (County of San Diego 2003a) for both pre-development and post-development conditions. The Hydrology/Drainage Study (Snipes-Dye 2010a) calculated a minimal increase in runoff between pre-development and post-development conditions. Pre-development conditions were based on the existing agricultural land use. There would be a minimal increase in peak discharge with the development of the project site; however, this small increase would not significantly modify the hydrology or drainage of the site based on lengthened flow paths and a reduction of slope due to the creation of building pads and improved quality of vegetative cover, which provides for enhanced infiltration of surface storm discharge. The runoff from the proposed project with the development of the site into 125 single-family residences is expected to be at or below pre-development conditions. Guidelines 1, 2, and 3

would not be exceeded. Therefore, the proposed project would result in a ***less-than-significant*** impact related to drainage and site hydrology.

Water Quality

The property site is a part of the Santa Maria Valley Hydrologic Area. This area is not listed on the 2006 list as an impaired water body, although the Pacific Ocean/San Dieguito River is impaired. Thus, no identified pollutants and stressors are known at this point that impact the Santa Maria Valley, but they exist further downstream from the project site.

The Cumming Ranch property does not discharge directly into a receiving water. All anticipated project pollutants would be treated onsite by appropriate site, source, or treatment control BMPs prior to being discharged from the project site, as outlined in the Storm Water Management Plan (Snipes-Dye 2010b).

Water quality standards are set forth in applicable storm water permits and also serve to establish WDRs for controlling pollutants in the runoff from the project. Various pollutants affecting water quality would be potentially generated by the project. The potential pollutants listed for detached single-family residences according to the County of San Diego Storm Water Standards Manual include sediment, nutrients, trash and debris, oxygen-demanding substances, oil and grease, bacteria and viruses, and pesticides. A summary of the general adverse environmental effects that can result from these pollutant categories related to project construction activities and postconstruction conditions with impervious surfaces is provided in Table 4-3.

Project construction could result in polluted runoff, which may have short-term impacts on surface water quality through activities such as grading, stockpiling of soils and materials, concrete pouring, painting, and asphalt surfacing. Pollutants could impact water quality if they are washed offsite by storm water or non-storm water, or are blown or tracked offsite to areas susceptible to washoff by storm water or non-storm water. Sediment is the most common pollutant associated with construction sites due to associated earth-moving activities and areas of exposed soil. Sediment that is washed offsite can result in turbid conditions in receiving waters, which can impact aquatic species. Sediment deposits can alter substrate, habitat, and drainage courses. In addition, if appropriate BMPs are not implemented, development of the project site could cause erosion downstream during the course of construction. Hydrocarbons such as fuels; asphalt materials; and oils, paints, and concrete slurries discharged from the project site could impact aquatic plants and animals downstream.

After construction, the pollutants that are expected to be generated from the introduction of impervious surfaces from the proposed project are sediment, trash and debris, and oil and grease. Sediment yield from the project would be reduced with a reduction of slope due to the creation of building pads, reduction of erodible surfaces with the creation of impervious surfaces, and improved quality of vegetative cover with lengthened flow paths, which provides for enhanced infiltration of surface storm discharge. All site discharges would sheet flow over naturally vegetated grades for an average of 100 feet in all directions surrounding each individual lot (Snipes-Dye 2010b). Impacts from sediment would be reduced to a negligible consideration due to the lack of concentrated flow and reduced overall flow energy from the site to well below erosive velocities.

All anticipated postconstruction pollutants would be treated prior to being discharged from the project site. The main form of treatment would be vegetated swales surrounding each home and natural vegetation in the open space areas and buffers, which would serve as biofilters. Runoff from the roads and some small portion of the driveways would be treated by vegetated swales adjacent to the roadways. The native site features would address potential issues of nutrients, trash and debris, oxygen-demanding substances, oil and grease, bacteria and viruses, and pesticides (Snipes-Dye 2010b). Thus, these natural areas would provide for the filtration of pollutants and nonpoint discharge before the discharge reached any surface water body, or before the water infiltrated into the groundwater basin, and impacts would be less than significant to water quality after project construction.

A SWPPP would be required and would be developed in compliance with a General Construction Storm Water Permit, and a Waste Discharger Identification (WDID) number would be issued by the RWQCB prior to the issuance of a grading permit by the County. The SWPPP would include specific measures and standard construction BMPs to minimize potential water quality impacts during construction.

With the implementation of the Storm Water Management Plan (Snipes-Dye 2010b) and all measures required through the prepared SWPPP, the project would not result in the contribution of additional pollutants to surrounding water bodies after construction is complete. Because Guideline 1 has not been exceeded, the project would result in a ***less-than-significant*** impact related to water quality.

Flooding Hazards

Areas B and C are subject to significant flooding, as depicted on the County's Flood Control Maps included in the Drainage Study (Snipes-Dye 2010a). However, no residential development

is proposed for Areas B and C. Residential development would occur only within Area A. The outside perimeter of a few residential lots, approximately 11, would be located within the delineated 100-year flood hazard area; however, no building pads would be located within the limits of the lines of inundation. As part of the final map requirements, flowage easements would be placed over the portion of these lots within the 100-year flood hazard area. These flowage easements would restrict the construction of any facility or structure that could impede the flow of water through the area during a flood. Flood studies through the project site in the pre- and post-development conditions match at the point of confluence with the County's mapping. Runoff from the proposed project with development of the project site would be at or below pre-development conditions (Snipes-Dye 2010a), and, therefore, would not create flooding conditions. In addition, development of the project would not alter the flow paths of the current swales with appropriate BMPs that are outlined in the Storm Water Management Plan (Snipes-Dye 2010b). Therefore, Guidelines 1 and 2 would not be exceeded, and the proposed project would result in a ***less-than-significant*** impact related to flooding hazards.

4.1.1.4 Cumulative Impact Analysis

Water quality and hydrology impacts can have widespread effects to an entire watershed, hydrologic unit, and additional downstream locations. For this reason, the study area for analysis of potential cumulative impacts to water quality and hydrology includes the entire cumulative project list encompassing all of the Ramona Community Planning Area.

Drainage and Hydrology

Urban development within the Ramona Community Planning Area would increase impervious areas and, consequently, increase storm water runoff. These increases could result in flooding, drainage systems capacity issues, and erosion problems. However, most development projects are subject to NPDES regulations, which require addressing changes to hydrologic regime and mitigation for conditions of concern. In addition, most projects are reviewed by other jurisdictions for hydrologic impacts. Development of the cumulative projects would not create an increase of runoff or peak flow rates, rather, conditions would be the same as pre-development. Guideline 3 would not be exceeded. Therefore, cumulative drainage and hydrology impacts would be ***less than significant***.

Water Quality

Urban development would increase impervious areas and activities that generate pollutants, and, consequently, could result in additional impacts to receiving waters in the San Dieguito

Hydrologic Unit. Most development projects are subject to NPDES regulations, which require that source control and nonpoint-source BMPs be employed to control potential effects on water quality, and that storm water quality-control devices be incorporated into storm water collection systems to collect sediment and other pollutants. BMPs for construction activities, postconstruction activities, and treatment control in compliance with applicable regulations would be incorporated for cumulative projects. Guidelines 3 and 4 would not be exceeded, and cumulative impacts would be ***less than significant***.

Flooding Hazards

Some erosion and flooding problems occur naturally within the watershed. Potential significant impacts from cumulative projects would not occur due to required drainage controls. Overall, many of the cumulative projects are lot subdivisions, and many others are located in the developed Ramona Town Center. These types of projects typically do not have the capacity to substantially change the overall hydrology of an area and result in flooding hazards, as described in Guideline 3. Therefore, Guideline 3 would not be exceeded, and cumulative impacts would be ***less than significant***.

4.1.1.5 Conclusions

Development of the proposed project would result in similar hydrologic conditions after project construction compared to preconstruction hydrologic conditions. Large areas of pervious open space would be preserved throughout the development footprint, which would act as natural biofilters, and all existing drainages throughout the site would be maintained. With implementation of the Storm Water Management Plan (Snipes-Dye 2010b) and a SWPPP, the project would achieve adequate water quality for storm water runoff, and Guidelines 1, 3, and 4 would not be exceeded. Impacts related to flooding would be less than significant without mitigation, and Guideline 2 would not be exceeded. Therefore, hydrology and water quality impacts would be less than significant.

4.1.2 Hazards and Hazardous Materials

This section evaluates the potential for hazards and hazardous materials to affect public health and safety during construction and operation of the proposed project. Hazardous materials are generally substances that have the capacity to cause harm or a health hazard during normal exposure, accidental release, or mishap. They are characterized as being toxic, corrosive, flammable, reactive, an irritant, or a strong sensitizer.

Hazards associated with the proposed project include fire hazards, proximity to the Ramona Airport, and chemical exposure related to the historic use of the property for agriculture. Flooding risks are addressed in Section 4.1.1, Hydrology and Water Quality.

A Phase I Environmental Site Assessment was conducted by GeoSoils, and a report was completed on June 30, 2006 (GeoSoils 2006a; Appendix I). As recommended in the Phase I Environmental Site Assessment, a limited agricultural residue survey was conducted by GeoSoils, completed on June 30, 2006 (GeoSoils 2006b; Appendix J).

4.1.2.1 Existing Conditions

Hazardous Materials

The property is currently vacant and undeveloped. The presence of asbestos, lead, or lead paint is typically associated with building structures; however, there are no buildings located on the project site. Portions of the site are currently used for cattle grazing and growing oat-hay. There are two water wells located on the property (one of the wells has two separate shafts). A few trash and debris piles have been removed from the project site and disposed of offsite according to proper protocol. The site assessment revealed no evidence of recognized environmental conditions from the trash and debris within the project property. No evidence of visible surficial staining on the property or onsite hazardous materials and waste and/or petroleum contamination has been observed (GeoSoils 2006a). There are no signs of underground storage tanks, above-ground storage tanks, or known storage of hazardous chemicals located on the property. Based on an interview with the previous landowners, no known underground storage or above-ground storage tanks are located on the property. In addition, there are no uses observed on the properties surrounding the project site that appear to be contributing significant hazardous waste/materials and/or petroleum contamination to the project site (GeoSoils 2006a).

A small gun club, also referred to as the Palomar Sportsman's Club, was located on the east side of Area A, and was used from approximately 1956 to 1980. The gun club consisted of a shotgun range for skeet and trap shooting, and a rifle/pistol range. Lead pellets and expended bullets remained on the surface or within a depth of 3 inches from the surface until 1994–1997, when a voluntary cleanup was performed on both range areas. A total of 21.2 fifty-five-gallon drums of recyclable lead, empty shell casings, and related materials were removed and transported to an authorized recycling facility by the cleanup contractor. Additionally, approximately 16 tons of spoil materials from the cleanup process (fine soils and lead fragments) were removed, transported, and disposed of in a hazardous waste landfill by Laidlaw Environmental Services under a USEPA manifest. Soil sampling and testing were performed by GeoSoils, and tests

indicated that no downstream migration of lead or other metals occurred (GeoSoils 2006a). No residential lots are proposed within the former range areas.

A database records search was conducted by GeoSoils on May 21, 2004, and included a 2-mile-radius search. No permitted underground storage tanks or above-ground storage tanks were listed on the project site or within the surrounding vicinity. The database search also did not report any unauthorized releases of hazardous materials on or near the site. No solid waste landfills were reported in the radius search. No oil and gas fields are located in the immediate vicinity of the project site. A review of historical aerial photographs was conducted on June 4, 2004, at the County DPLU office. In addition, a review of the U.S. Geological Survey (USGS) 7.5-minute topographic quadrangle map was conducted. No surficial evidence of petroleum contamination and/or hazardous waste was observed immediately adjacent to or within the project property (GeoSoils 2006a).

Fire Hazards

Fire protection services are controlled by RMWD, which governs the Ramona Fire Protection District. The fire district's boundaries correspond to the RMWD's boundaries. The RMWD fire-protection service area includes the Ramona Town Center, San Diego Country Estates, the Highland Valley region, and various other outlying areas. In 1993, RMWD entered into a contract with CAL FIRE to provide fire and paramedic personnel to RMWD. These two agencies primarily handle wildland fires and jointly operate an air attack base at the Ramona Airport. Currently, there are no buildings located on the project site; thus, no structural fire threat exists. Fire stations servicing the project area are included in Table 4-4. Fire-protection services for the proposed project are discussed in greater detail in Subchapter 3.6, Pubic Services and Recreation.

Wildfires are prevalent during the dry summer months in the northern and eastern portions of San Diego County and may be increasing in frequency and intensity due to climate change (Subchapter 3.5.1). The project site is located in the northeastern region of the County. Native and nonnative grassland, and Diegan CSS occurs within the northern project area and to the north of the project boundary. The areas surrounding the western, eastern, and southern boundaries of the project site include nonnative grassland, eucalyptus, and small ranches typical of wildland urban interface, and structures and flammable vegetation exist in the same area.

The Fire Protection Plan (Scott Franklin Consulting 2010; Appendix K) analyzes the wildfire potential for the project area with various fuel models for the summer and fall/winter catastrophic wildfire conditions. These two catastrophic wildfire conditions would reflect how fire moves through grass and brush found onsite and offsite, and through surface litter. Table 4-5

summarizes the analysis for the fire-spread models and catastrophic wildfire conditions related to the project site. These fire-spread models were used to indicate the amount of flame propagation that would exist under extreme fire weather conditions. Spotting distance is the distance a burning branch, leaf, or twig will carry in a wind-driven fire. Ignition component is an indicator of the flammability of the fuel and is measured in percent. A probability of ignition that is more than 60% is considered severe. All ignition components used in the Cumming Ranch scenario displayed a 100% ignition component, reflecting a "worst-case" wildfire scenario. The predominant fuel found on the project site and surrounding areas is Fuel Model 1, and the shrub areas are represented with Fuel Models 2 and 6.

As previously indicated, existing risk of wildfire to the project area is extreme. The project site also has potential for catastrophic wildfire. These conditions are illustrated by the different model outputs summarized in Table 4-5, which attempt to typify the characteristics of a likely wildfire in the project area.

Airport Land Uses and Associated Hazards

The Ramona Airport is located north of the project property on Montecito Road. The U.S. Navy built the Ramona Airport as an emergency landing field in 1943 and constructed the existing runway in 1945. In 1956, the airfield was conveyed to the County and, 2 years later, the U.S. Forest Service and CAL FIRE created a joint Air Attack Base for firefighting out of the Ramona Airport. A parallel taxiway, a transient aircraft parking apron, a runway extension, sewer lines, and an air traffic control tower were constructed in the following decades. The Ramona Airport is the third busiest facility in the County's system, with approximately 130,000 operations each year.

The Ramona Airport Land Use Compatibility Plan (Compatibility Plan) was adopted in December 2006 by the San Diego County Airport Land Use Commission. The purpose of the Compatibility Plan is to promote compatibility between the airport and the land uses in the surrounding area. The Compatibility Plan provides for the orderly growth of the Ramona Airport and the surrounding area, and safeguards the general welfare of the inhabitants within the vicinity of the airport and the public in general. The Compatibility Plan addresses potential airport compatibility impacts related to exposure to aircraft noise, land use factors that affect safety both for people on the ground and the occupants of aircraft, protection of airport airspace, and annoyance and other general concerns related to aircraft overflights. The Cumming Ranch project site is directly south of the Ramona Airport and is within the Airport Influence Area (Review Area 1 and Review Area 2) as designated in the Compatibility Plan.

Applicable Regulations and Policies

Several federal, state, and local agency databases have been established to regulate hazardous wastes. The federal databases are regulated by USEPA, state databases are regulated by State of California agencies, and local databases are regulated by County of San Diego agencies. In addition, there are various local applicable policies and guidelines related to wildland fire hazards and fire protection. Many of the hazardous material regulations and programs listed below pertain to the proposed project because the site was historically used for a gun range and agriculture uses, which can involve the use of hazardous chemicals in the form of pesticides, herbicides, and sometimes the storage of those chemicals onsite. Other regulations related to fire safety and standards are applicable to the proposed project due to the risk of wildland fires throughout the rural area.

Federal

Resource Conservation and Recovery Act Program

The USEPA Resource Conservation and Recovery Act (RCRA) Program was enacted in 1976 and amended in 1984. The RCRA program identifies and tracks hazardous waste from the point of generation to the point of disposal. Other goals of RCRA include conserving energy and natural resources by recycling and recovery; reducing or eliminating waste; and cleaning up waste that may have spilled, leaked, or been improperly disposed of.

Comprehensive Environmental Response, Compensation, and Liability Act

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) was created in 1980 to tax chemical and petroleum industries, and provide federal authority through USEPA to respond to the release or threatened release of hazardous substances that could endanger the public or the environment. CERCLA provides funding and enforcement to clean up hazardous waste sites created in the past and to respond to hazardous substance spills.

Federal Aviation Administration, 14 CFR Part 77 – Objects Affecting Navigable Airspace

Federal Regulation Title 14, Part 77 establishes standards and notification requirements for objects affecting navigable airspace. This notification serves as the basis for evaluating the effect of the construction or alteration on operating procedures, determining the potential hazardous effect of the proposed construction on air navigation, identifying mitigating measures to enhance safe air navigation, and charting new objects. Notification allows FAA to identify potential

aeronautical hazards in advance, thus preventing or minimizing adverse impacts to the safe and efficient use of navigable airspace. Once FAA has completed an aeronautical study, a determination is made regarding the impact to air navigation. One of three responses is typically issued: No Objection (the subject construction did not exceed obstruction standards and marking/lighting is not required), Conditional Determination **(**the proposed structure would be acceptable contingent upon implementing mitigating measures), or Objectionable (the proposed structure is determined to be a hazard).

State

California Environmental Protection Agency

CalEPA was created in 1991, and its mission is to restore, protect, and enhance the environment to ensure public health, environmental quality, and economic vitality. The CalEPA's Department of Toxic Substances Control goal is to protect the environment and the public from exposures to hazardous wastes.

Local

San Diego County Department of Environmental Health, Hazardous Materials Division

The County's Hazardous Materials Division is certified and responsible for regulating hazardous materials, hazardous wastes and tiered permitting, medical wastes, and underground storage tanks.

Consolidated Fire Code, County of San Diego Ordinance No. 9669

The County of San Diego Consolidated Fire Code prescribes regulations in the unincorporated territory of the County for the protection of public health and safety, requiring a permit and inspection for the installation or alteration of systems, defining certain terms, and establishing minimum regulations (County of San Diego 2004e). These regulations are applicable for the erection, construction, enlargement, alteration, repair, moving, removal, conversion, demolition, equipment use, and maintenance of buildings and structures, including the installation, alteration, or repair of new and existing fire protection systems and the inspection thereof, and providing penalties for the violation. This Fire Code adopts the County of San Diego Amendments and the fire code portion of the California Building Standards Code, including Divisions I-A through VI-K inclusive, except for Appendix IIF and III-B, the Uniform Fire Code (2000 edition) and the

Uniform Fire Code Standards (2000 Edition) published by the Western Fire Chiefs Association, and the National Fire Protection Association Standards 13 & 13D, 1999 Edition.

County of San Diego Ordinance No. 10146

The purpose of Ordinance No. 10146 is to adopt the 2010 California Building Code and to amend the San Diego County Building Code (County of San Diego 2004f) to include measures that increase the likelihood of a building or structure to withstand intrusion by fire. Building elements addressed include building design and construction methodologies that use ignition-resistant building materials and provide protection of structure projections including porches, decks, balconies and eaves, and structure openings including attic and eave vents and windows, with the intent of resisting the intrusion of a wildland or similar exposure fire. The Fire Authority Having Jurisdiction is the designated entity providing enforcement of fire regulations as they relate to planning, construction, and development. The Fire Authority Having Jurisdiction may also provide fire suppression and other emergency services.

Ramona Community Plan

The Ramona Community Plan includes a Safety Element that addresses risk avoidance and mitigation of natural hazards such as earthquake, flood, and fire, and the provision of adequate emergency services.

The Safety Element of the Ramona Community Plan includes Goal S 1.1:

> "*Maximum protection to residents of the planning area from natural hazards such as earthquakes, food, and fire, and provide adequate police protection and other emergency services*."

Memorandum of Understanding between USFWS, CDFG, CAL FIRE, San Diego County Fire Chief's Association, and the Fire District's Association of San Diego County

The purpose of this Memorandum of Understanding (Memorandum 1997) is to establish guidelines by which CAL FIRE, the San Diego County Fire Chief's Association, and the Fire District's Association of San Diego County can continue to protect lives and property from the threat of fire by requiring the abatement of flammable vegetation pursuant to state law, County and district ordinances, and cities' municipal codes, and to establish a cooperative mechanism whereby USFWS and CDFG may assess, minimize, and help account for potential adverse impacts to sensitive species and habitats resulting from vegetation abatement activities.

Ramona Airport Land Use Compatibility Plan

As described above, the Compatibility Plan for the Ramona Airport sets compatibility criteria applicable to local agencies in their preparation or amendment of land use plans and ordinances, and to land owners in their design of new development. As the area generally surrounding the Ramona Airport is unincorporated, the Compatibility Plan is, at this time, primarily applicable to the County as it prepares land use plans and reviews development proposals within its jurisdiction. Private parties are subject to the provision of the Compatibility Plan either directly or as implemented in plans and zoning of the County.

4.1.2.2 Guidelines for the Determination of Significance

The significance determination guidelines were based on Appendix G of the CEQA Guidelines. The guidelines were specified to the project based on the local environment and surroundings, such as proximity to the Ramona Airport and use of the site and general area for agricultural purposes. The project would have a direct or cumulative significant adverse effect related hazards if the project would do any of the following:

1. Expose people to elevated levels of hazardous chemicals from past uses on the project site or current uses adjacent to the project site.
2. Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, or conflict with applicable fire safety codes and regulations.
3. Conflict with safety regulations related to the Ramona Airport or result in a safety hazard for people residing or working in the project area due to the proximity of the Ramona Airport.

4.1.2.3 Analysis of Project Effects and Determination of Significant Impact

Hazardous Materials

Implementation of the project would not involve the use, transport, exposure, or disposal of hazardous materials beyond those typically used for construction. Although a gun range had occupied the project site in the past, no residential lots are proposed within the former gun range. In addition, a records search based on federal, state, and county hazardous waste lists and databases was conducted for the project and did not identify any sites within the search radius.

Dry farming typically does not require the extensive application of pesticides/herbicides that might be required for other crops more prone to pest or weed infestations. Based on chemical testing of near-surface soils on the project site, no detectable concentrations of restricted agricultural chemical residues were found and, specifically, no concentrations of compounds were reported to be greater than the detection limits for chlorinated pesticides, organophosphorous pesticides, or chlorinated herbicides (GeoSoils 2006b).

The proposed project would not conflict with Guideline 1 and would result in ***no impacts*** related to hazardous materials.

Fire Hazards

The wildfire risk analysis included in the Fire Protection Plan (attached in Appendix K) prepared for the project found that there is a significant risk of wildfire to the proposed project due to continuous fuel supply surrounding the project area (Scott Franklin Consulting 2010). The analysis studied a worst-case wildfire scenario for the project site to determine the amount of flame propagation that would occur under extreme fire weather conditions. The results of the analysis were then used to determine measures appropriate to reduce the risk of catastrophic wildfire to the proposed development. The necessary measures to reduce wildfire risk are the basis for the Fire Protection Plan. The project is within the 10-minute travel time requirement for fire and emergency response, as Fire Station 82 is located in the immediate project vicinity on Dye Road, approximately 0.5 mile from the project site.

The Fire Protection Plan addresses defensible space for fire suppression resources through fuel management zones and restrictions on highly flammable plant material. The plan also addresses issues such as infrastructure and structural fire protection, access, and water supply. All of the specifications and details of the Fire Protection Plan would be implemented as part of the project to provide adequate fire safety for the residential homes throughout the project site.

The project would be required to meet all current fire code requirements of California and the County. The project design features and requirements in the Fire Protection Plan meet or exceed those requirements. CC&Rs regarding vegetation management, adequate fuel management zones, infrastructure/structural fire protection systems using the water supply, roadway designs, and building designs are planned for the project.

Fire is dynamic and somewhat unpredictable, and there is no guarantee that injury or other loss will not result from a wildfire; however, implementation of the Fire Protection Plan would reduce the risk of wildfires through multiple means, including vegetation management, structural

requirements, water supply requirements, and other measures that exceed standard fire codes. Appropriate emergency access on and off of the project site has been developed in coordination with the Ramona Fire Marshal. Because the project would not conflict with applicable fire codes or create a substantial risk due to wildfires per Guideline 2, the project would result in a ***less-than-significant*** impact related to fire hazard.

Airport Hazards

The Compatibility Plan for the Ramona Airport shows that the development area (Area A) of the Cumming Ranch project would be located outside of the 55- to 60-dBA Noise Impact Zone, meaning that noise generated by airport operations would be below 55 dBA at future residences. The Compatibility Plan considers this noise level acceptable for residential development. The northernmost portion of the project site (Area C) would be located within higher decibel Noise Impact Zones; however, no residential development is proposed for that area, as it would be designated as open space, and no compatibility issues or hazards would result.

A portion of the Cumming Ranch site located generally north of Highland Valley Road, including areas of residential development, would be within Safety Zone 6. Residential development within Safety Zone 6 is described in the Compatibility Plan as an acceptable land use. Other uses throughout this area, such as trails in Area A and open space, would be compatible with Safety Zone 6. The northeastern-most corner of Area C is within Safety Zones 2 and 3; however, no project development would occur within these Safety Zones, and the area would continue to be preserved as open space.

The Cumming Ranch project site is also within the area shown for airspace protection surfaces and within policy boundaries requiring Aviation Easement Dedications and Overflight Easement Dedications. The location of the project within these areas does not create a compatibility conflict or hazard if certain conditions are met, as described in more detail below.

A letter dated February 13, 2004, from the San Diego County Regional Airport Authority to the County of San Diego (San Diego County Regional Airport Authority 2004a and 2004b) stated that it approved the Cumming Ranch project under certain conditions, as found in Resolution 2002-0012 dated February 2, 2004. These conditions do not pertain to hazards but to interior sound, aviation easements, and compliance with FAA Part 77 requirements, which address standards for aircraft operations and air safety and navigation. Specifically, FAA Part 77 addresses obstruction standards for building structures and infrastructure. Building structures unrelated to airport facilities are to be at a height no greater than 200 feet above ground level or above the established airport elevation, whichever is higher, within 3 nautical miles of the

established reference point of an airport and 15 feet for roadways (FAA Section 77.23). Prior to issuance of building permits, the appropriate notification and determination from FAA would be required to show that proposed residential structures would not conflict with any FAA safety regulations**.** FAA reviewed the proposed windmill to be located in Area C and concluded that the structure would not exceed obstruction hazards or be a hazard to air navigation, and issued a Determination of No Hazard to Air Navigation (FAA 2009).

The project would not be in conflict with safety regulations related to the Ramona Airport or result in a safety hazard for people residing and working within proximity of the airport. The project would not conflict with Guideline 3, and implementation of the project would result in a ***less-than-significant*** impact related to airport hazards.

4.1.2.4 Cumulative Impact Analysis

While some hazardous conditions are site specific, other types of hazards, such as wildfires or hazardous materials contamination, have the potential to impact a widespread area. Because of the possibility for large areas to be affected by hazardous conditions, the entire Ramona Community Planning Area was considered for the cumulative impact analysis.

The residential project would not utilize, transport, expose, or dispose of hazardous materials that may impact the surrounding community. Development of residential units on the project site would also not result in additional hazardous materials being introduced to the Ramona community. A large portion of the cumulative projects in the Ramona community are residential subdivisions or similar actions that would not generate or expose people to hazardous materials either during construction or operation. Therefore, there would be no conflict with Guideline 1, and ***no cumulative impact*** from hazardous waste/materials, contamination, or agricultural residue from chemicals and pesticides would occur with the implementation of the cumulative projects.

With increased development in the region, additional fire protection and emergency service demand would be generated. All new projects must meet County General Plan travel times, which would keep services in line with the demand. The County's current fee program would fund services for new developments. In addition to the contribution to the fee program, similar fire and vegetation management plans would be required for future projects. In addition, the placement of a housing development at the Cumming Ranch site would not increase wildfire hazards for any adjacent properties. There would be no conflict with Guideline 2, and cumulative impacts related to wildfire hazards would be ***less than significant***.

Projects located in the area surrounding the Ramona Airport would be required to be consistent with and adhere to the Compatibility Plan. For these reasons, there would be no conflict with Guideline 3, and cumulative impacts related to airport safety would be ***less than significant***.

4.1.2.5 Conclusions

As described above, the proposed project would not result in a significant hazard impact. No detectable amounts of hazardous chemicals were found to be present on the project site. The potential for wildfires to the residential development would be less than significant through implementation of the Fire Protection Plan, including buffers, appropriate landscaping in specifically defined areas, and other safety measures to protect the development. The Ramona Airport is located at a safe distance to the north, and there would be no safety concerns for the residential development or airport operations. For these reasons, all potential safety- and hazard-related impacts would be less than significant without mitigation.

4.1.3 Agricultural Resources

This section evaluates the potential loss of agricultural resources due to implementation of the proposed project, and summarizes information provided in the Agricultural Analysis Report prepared for this project (AECOM 2010c; Appendix L). Included is an explanation of the existing and previous agricultural uses on the site and surrounding areas, an explanation of the various criteria and methods used to evaluate the significance and quality of agricultural land with a potential to be affected, and analysis of the effect of the Cumming Ranch project on agricultural resources.

4.1.3.1 Discussion of Existing Conditions Relating to Agricultural Resources

Current and Historic Agricultural Use

The Cumming Ranch property has primarily been used for cattle grazing and farming since the 1950s. Farming consisted of dry farming and grazing, and these agricultural activities have remained generally the same to date. Currently, there is no irrigation on the project site, and the property was not irrigated in the past. The project site is not under a Williamson Act contract.

Currently, Areas A and B are used as farmland. Farming practices onsite rotate between nonirrigated oat-hay crops and cattle grazing. Approximately 400 acres of the 682.6-acre project site are currently in agricultural use. Farming activities occur on approximately 220 acres of Area A and approximately 180 acres of Area B. Area C is not currently used as farmland due to the vernal pools on that portion of the property and the 22.2 acres of conservation easements that

exist in that area. There are no buildings or structures on the site, with the exception of two windmills and remnants of cattle corrals. Natural vegetation occurs on portions of the site that are not conducive to agriculture, such as rocky outcroppings, drainages, and steep slopes.

Agricultural operations occur on the project site throughout the year. Farming activities vary depending on the season; however, the rotation of these activities is generally consistent from year to year. Below is a description of the agricultural operations that take place on the site, broken down into four general categories. Information regarding ongoing agricultural practices on the Cumming Ranch site was provided by Jack Dempsey who is currently farming the property (Dempsey 2009). Table 4-6 shows the agricultural activities that occur on the project site throughout each year.

Oat hay crops that are grown on the property are either harvested or grazed-off, depending on the crop condition. The majority of oat-hay harvested on the Cumming Ranch property is used for onsite supplemental cattle feed during periods of low grazing. Table 4-7 summarizes the oat-hay crop production on the project site for the past 7 years, as well as the weather conditions for each year.

The cattle that graze the project site for a few months each year spend the remainder of the year on the adjacent Hardy Ranch. The site sustains a maximum of 40 to 50 head of cattle on an annual basis. To run the cattle business, the property owner must carry liability insurance.

Over the past two decades, the economics of relatively small-scale dry farming has limited the viability of continued agricultural uses on the project site. It is becoming increasingly difficult to operate a small-scale dry-farming and cattle grazing operation and maintain economic productivity and profit. In addition, the overall suitability of the site for farmland has declined, as areas surrounding the project site have filled in with urban uses, such as the Ramona Town Center adjacent to the east and other surrounding residential areas. For this reason, shifting to a more intense agricultural use at this location would not be practical, nor is it consistent with the planned land use of the site in the Ramona Community Plan.

The formation of the Ramona Grasslands Preserve is currently underway with the recent purchases of adjacent and nearby land. The areas purchased for inclusion include all, or portions of, the Hardy Ranch, Cagney Ranch, Oak County Estates, Davis Ranch, and Gildred properties. The Cumming Ranch, specifically Areas B and C, are considered to be an important piece of the grasslands, providing connectivity to the areas already purchased for the preserve. The majority of the proposed grassland area is to the northwest of the project site.

Surrounding Agricultural Use

The agricultural interface surrounding the project site consists of generally nonintensive small family farming activities, such as raising 4-H-type animals. Areas surrounding the southern portion of the site are generally developed with residential homes that may have small-scale animal-keeping and farming operations. A similar interface occurs along the western border of the site. Along the northwestern portion of the project site is a generally undeveloped area, which is currently used for cattle grazing. East of Areas B and C is the Ramona Town Center and SMWWTP, where development is more urban and dense and where, generally, no farming practices take place. In the southeast corner of the project site, along the SR 67 corridor, are additional large parcels used for farmland. A series of rabbit houses are located to the east of the project. Some parcels between the project site and SR 67 are generally used for cattle grazing, and southeast of SR 67 there are additional grazing lands and some areas of crop production. In general, large-scale commercial livestock or crop production does not occur on lands surrounding the project site.

Farmland Mapping and Monitoring Program

The Farmland Mapping and Monitoring Program (FMMP) monitors and documents land use changes that specifically affect California's agricultural land. The FMMP program classifies the land's suitability for agricultural production, which includes physical and chemical characteristics of soils and specified land-use characteristics. The FMMP classifies land as Prime Farmland, Farmland of Statewide Importance, Unique Farmland, Farmland of Local Importance, Grazing Land, Urban and Built-Up Land, and Other Land.

The Cumming Ranch project site does not contain lands designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. The San Diego County Important Farmland Map (California Department of Conservation 2008a) shows the majority of Area A north of Highland Valley Road designated as Grazing Land. Within Area A south of Highland Valley Road, the property is generally classified as Farmland of Local Importance. The majority of Areas B and C are also classified as Farmland of Local Importance.

Applicable Regulations and Policies

This section contains applicable regulations and policies that are found in the Ramona Community Plan (County of San Diego 2002b), zoning ordinance, and other County ordinances. Also addressed are agricultural policies as adopted by LAFCO.

Ramona Community Plan

The following are policies and recommendations contained in the Ramona Community Plan (County of San Diego 2011a) that are relevant and applicable to agriculture as it relates to the Cumming Ranch project.

Agricultural Land Use

Goal COS 1.2 of the Ramona Community Plan is "The preservation of Agriculture in the Planning Area." Applicable policies are as follows:

- Policy COS 1.2.1: Promote and preserve viable agriculture land uses and provide an attractive agricultural industry atmosphere within the Ramona Planning Area.
- Policy COS 1.2.2: Encourage agricultural uses to utilize reclaimed water such as tertiary treated effluent produced by the RMWD wastewater treatment facility.
- Policy COS 1.2.3: Encourage the protection of areas designated for agricultural actives from scattered and incompatible urban intrusions. Greenbelts/buffers shall be encouraged in special cases between incompatible uses and high-intensity agricultural zoning.
- Policy 1.2.4: Limit high-intensity agricultural uses, such as Confined Area Feeding Operations, to appropriate locations that will not adversely affect adjacent residences or other sensitive uses.

Residential Land Use

Residential Land Use Goal LU 2.1 of the Ramona Community Plan is defined as "residential development that is compatible in scale and intensity with existing neighborhoods and in harmony with the natural environment and agricultural and equine activities." The applicable policy is as follows:

- Permit residents to keep leisure, market, and large animals on their property in areas with land densities of SR-0.5 or less.

San Diego County Zoning Ordinance

The San Diego County Zoning Ordinance (County of San Diego 2003b) is applicable to all unincorporated areas of the County. Currently, the Cumming Ranch site is zoned as a SPA (S88), and the surrounding areas are generally zoned as Agriculture (County of San Diego 2004c).

County of San Diego Agricultural Enterprises and Consumer Information Ordinance

As part of the San Diego County Code of Regulatory Ordinances, the purpose and intent of the Agricultural Enterprises and Consumer Information Ordinance is to define and limit the circumstances under which agricultural enterprises activities, operations, and facilities constitute a nuisance (County Code Sections 63.401 and 63.402). This Ordinance provides a procedure to enhance the County's ability to identify and evaluate the potential conflicts between a land use proposal and an agricultural enterprise when the land use proposal is adjacent to, or in proximity of, an agricultural enterprise. To accomplish the procedure of evaluating potential land use conflicts, the Ordinance limits the definition of an agricultural nuisance by stating the following:

> No agricultural enterprise, activity, operation, or facility, or appurtenances thereof, conducted or maintained for commercial purposes, and in a manner consistent with proper and accepted customs and standards, as established and followed by similar agricultural operations in the same locality, shall be or become a nuisance, private or public, due to any changed condition in or about the locality, after the same has been in operation for more than three years if it was not a nuisance at the time it began (County Code Section 63.401).

Local Agency Formation Commission

Government Code Section 56377

San Diego LAFCO is required to consider impacts on open space and agricultural lands per Government Code Section 56377. In reviewing and approving or disapproving proposals that could reasonably be expected to induce, facilitate, or lead to the conversion of existing open-space lands to uses other than open-space uses, LAFCO considers the following policies and priorities:

a. Development or use of land for other than open-space uses shall be guided away from existing prime agricultural lands in open-space use toward areas containing nonprime agricultural lands, unless that action would not promote the planned, orderly, efficient development of an area.

b. Development of existing vacant or nonprime agricultural lands for urban uses within the existing jurisdiction of a local agency or within the sphere of influence of a local agency should be encouraged before any proposal is approved [that] would allow for or lead to the development of existing open-space lands for non-open-space uses [that] are outside

of the existing jurisdiction of the local agency or outside of the existing sphere of influence of the local agency.

San Diego LAFCO Policy L-101

In response to these statutory requirements, San Diego LAFCO adopted Policy L-101, Preservation of Open Space and Agricultural Lands. San Diego LAFCO Policy L-101 states the following:

1. Discourage proposals that would convert prime agricultural or open space lands to other uses unless such an action would not promote the planned, orderly, efficient development of an area, or the affected jurisdiction has identified all prime agricultural lands within its sphere of influence and adopted measures that would effectively preserve prime agricultural lands for agricultural use.
2. Require prezoning of territory (city only) to identify areas subject to agricultural/preservation and planned development.
3. Follow San Diego LAFCO's adopted procedures to define agricultural and open space lands and to determine when a proposal may adversely affect such lands.

Government Code Section 56064

Government Code Section 56064 states that "Prime agricultural land" means an area of land, whether a single parcel or contiguous parcels, that has not been developed for a use other than an agricultural use and that meets any of the following qualifications:

(a) Land that qualifies, if irrigated, for rating as Class I or Class II in the U.S. Department of Agriculture Natural Resources Conservation Service land use capability classification, whether or not land is actually irrigated, provided that irrigation is feasible.

(b) Land that qualifies for rating 80 through 100 Storie Index Rating.

(c) Land that supports livestock used for the production of food and fiber and that has an annual carrying capacity equivalent to at least one animal unit per acre as defined by the U.S. Department of Agriculture in the National

Handbook on Range and Related Grazing Lands, July 1967, developed pursuant to Public Law 46, December 1935.

(d) Land planted with fruit or nut-bearing trees, vines, bushes, or crops that have a nonbearing period of less than 5 years and that will return during the commercial bearing period on an annual basis from the production of unprocessed agricultural plant production not less than $400 per acre.

(e) Land that has returned from the production of unprocessed agricultural plant products an annual gross value of not less than $400 per acre for 3 of the previous 5 calendar years.

4.1.3.2 Guidelines for the Determination of Significance

Several resource documents provide guidance for the evaluation of potential impacts to agricultural resources. These include the FMMP (California Resources Agency), the San Diego Agriculture and Consumer Information Ordinance, the Ramona Community Plan, the California Public Resources Code (PRC Section 21000[b] and [c]), and Appendix G of the CEQA Guidelines.

The Cumming Ranch project would have a significant environmental impact on agricultural resources if it would do any of the following:

1. Convert important farmland, including, but not limited to, Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the FMMP of the California Resources Agency, to developed land uses, precluding the future use of those lands for agricultural use.
2. Conflict with existing General Plan policy or zoning for agricultural use, or a Williamson Act contract.
3. Result in the cumulatively significant impact to agricultural resources by making a cumulatively considerable contribution to the regional conversion of important farmland including, but not limited to, Prime Farmland, Unique Farmland, or Farmland of Statewide Importance in the Ramona Community Plan area in a way that jeopardizes the long-term agriculture goals of the community.

4.1.3.3 Analysis of Project Effects and Determination of Significant Impact

Direct Impacts

Direct conversion of farmland occurs when an urban or other developed land use would replace agricultural uses or farmland. Methodologies for analysis are discussed in the Agricultural Analysis Report, Appendix L. Implementation of the proposed project would result in the direct conversion of land currently and historically used as farmland to residential use. The approximately 220 acres in Area A that are currently farmed would be developed with homes and areas of open space. Although animal keeping (e.g., horses) and small farming practices would be permitted on individual lots (consistent with County regulations and CC&Rs), ongoing farming and grazing would not be feasible. The approximately 180 acres in Area B that are currently farmed would remain as farmland and be made available by the owner for acquisition for the Ramona Grasslands Preserve. At the time of purchase for grassland preservation, dry-land farming could cease and a management plan would be developed. The management plan for that area may include continued grazing. Area C is not currently used as farmland, and the land would continue to be preserved for onsite sensitive biological resources.

The following sections provide an evaluation of the significance of these changes in land use when considered against the thresholds of significance identified in Subsection 4.1.3.2.

Farmland Mapping and Monitoring Program

As previously discussed, the project site does not include Prime Farmlands, Unique Farmland, or Farmland of Statewide Importance, as classified and mapped by the FMMP. A majority of Area A north of Highland Valley Road is designated as Grazing Land, and the area south of Highland Valley Road is generally classified as Farmland of Local Importance. For these reasons, the proposed project would not convert any lands designated as significant under the FMMP to developed land uses***. No impact*** would result to these farmland classifications as designated by the FMMP per Guideline 1.

Although the project site is not considered significant per the FMMP designations as discussed above, portions of the site, most prominently in Area A south of Highland Valley Road, and Areas B and C, are designated as Farmland of Local Importance, meaning the site could be a significant agricultural resource specific to the Ramona area. There are approximately 142 acres of land with prime soils interspersed throughout Areas A and B, which is about 35% of the 400 acres currently farmed. Although prime soils exist throughout the site, historically the site has not supported intensive agricultural production beyond dry row crops and grazing. No irrigation

has been installed to facilitate increased agricultural productivity. Also, the adjacent development, including the Ramona Town Center and surrounding residential uses, as well as the Ramona Vernal Pool Preserve in the northern portion of the site, are additional limiting factors in increasing the onsite farming operations to make the project site a significant local agricultural resource. The Cumming Ranch property has been farmed for many years; however, there is no unique or considerable component of the farming history that makes this specific location important as a local agricultural resource. The land is not currently, nor has it historically, produced a crop that is important to the Ramona community's identity (i.e., flower fields in Carlsbad or poinsettias in Encinitas). In addition, the existing agricultural interface surrounding the project site is similar to that proposed by the project, with small agricultural operations occurring within residential properties. The community has planned for the conversion of the Cumming Ranch site to developed uses, as indicated by the designation of the site as an SPA in the Ramona Community Plan. For these reasons, the conversion of Farmland of Local Importance as designated by the FMMP is ***less than significant*** per Guideline 1.

Agricultural Zoning and Public Policy

Zoning

Currently, the Cumming Ranch site is zoned as an SPA (S88) (County of San Diego 2011a). The proposed project would be in conformance with the existing zoning for the site. Because the project site is not zoned for agricultural use, there would be no agricultural zoning conflict from the land being used for purposes other than agricultural activities. Therefore, implementation of the project would be consistent with existing zoning and ***no impact*** would result per Guideline 2.

Ramona Community Plan Policies

As outlined above, there are various policies in the Ramona Community Plan that relate directly to farmland and agriculture in the Ramona Community Planning Area. Overall, these policies support the maintenance and preservation of continued agricultural operations in the planning area. The evaluation of consistency with the Ramona Community Plan is intended to determine if the proposed project fits into the framework of goals that the County has adopted to guide future growth and development in the Ramona community.

As shown in Table 4-8, the project is consistent with the relevant policies of the Ramona Community Plan in relation to agricultural use in the planning area. Therefore, implementation of the proposed project would not be in conflict with Ramona Community Plan policies, and ***no impacts*** related to agricultural planning policies would result per Guideline 2.

Land Use Designations

The Cumming Ranch site is designated with a mix of SR-2, SR-10, and RL-40 land use designations to allow for both residential development and open space. As indicated by these approved land use designations, development of the project site was not intended to remain exclusively agricultural. The site is not designated by the Ramona Community Plan for agricultural use; therefore, ***no impact*** or conflict with an agricultural land use designation would result with implementation of the project per Guideline 2.

Local Agency Formation Commission Policies

LAFCO is required to consider impacts to open space and agricultural lands per Government Code Section 56377, and has adopted Policy L-101 in response. In reviewing and approving or disapproving proposals that could reasonably be expected to induce, facilitate, or lead to the conversion of existing open-space lands to uses other than open-space uses, the commission must give preference to conversion of nonprime agricultural lands over agricultural lands.

Per the Government Code Section 56064 definition of prime agricultural land as outlined above, portions of the Cumming Ranch property would be considered to be prime agricultural land. (Area C is not included in the evaluation as it is currently preserved for sensitive habitats and is not farmed and would not be farmed in the future, but would continue to be preserved as open space.) As detailed in the agricultural analysis prepared for the project (Appendix L), there are three prime soil types on the property: Fallbrook sandy loam (18 acres in Area A, 38 acres in Area B), Visalia sandy loam (10 acres in Area A, 43 acres in Area B), and Ramona sandy loam (24 acres in Area A). These three soil types also have a land use capability class ranking of I or II. Visalia sandy loam has a Storie Index Rating of 90. These soils characteristics meet the qualifications for prime agricultural land per Government Code Section 56064. While not currently irrigated, the project site is within the service area of RMWD; therefore, irrigation of the property is considered feasible.

Area A has approximately 62 acres of land that would qualify as prime agricultural land due to the soil types present; thus, development of the project within Area A would occur on prime agricultural land. However, as described in Section 4.1.4, Land Use and Planning, the site is designated with a mix of SR-2, SR-10, and RL-40 land use designations in the San Diego County General Plan. The property is zoned as SPA (S88). These land use designations from local planning documents clearly indicate that the property has been considered as an appropriate and logical location for expanded development of the Ramona community. Additionally, the Cumming Ranch property is immediately adjacent to the urbanized Ramona Town Center and

highly utilized transportation corridors serving the area, including SR 67 and Highland Valley Road. Although it is outside of the RMWD latent sewer service area, the SMWWTP is inset into the project boundary and surrounded by the Cumming Ranch property on three sides.

The majority of prime agricultural land within the project site is located in Area B (approximately 81 acres). The prime agricultural lands in Area B would not be developed. Portions of Area B could have long-term use for agricultural production, consistent with its mitigation and open space preservation requirement. This could be done with a revision to the RMP.

Because development of the project site is clearly planned for by the County of San Diego General Plan, the site is near an existing urbanized center and key transportation corridors, and the site is in immediate proximity to the SMWWTP, the project is considered to reflect the planned, orderly, and efficient development of the area. Additionally, prime agricultural lands within Area B would continue to be used for agricultural activities in the near-term until it is sold to the County or a conservancy. For these reasons, development of the prime agricultural lands within proposed project site is considered to be consistent with Government Code Section 56377(a) and San Diego LAFCO Policy L-101 requirements.

In addition, Government Code Section 56377(b) recognizes the desire to develop nonprime farmlands within an agency's jurisdiction or sphere of influence before developing open space areas outside of the jurisdiction or sphere of influence. While the Cumming Ranch project is outside of the RMWD's latent sewer service area, it is within the sphere of influence. The Cumming Ranch project is a logical, efficient, and planned development of residential use in the Ramona area. Furthermore, an alternative location for development is not considered feasible. As detailed in Section 5.1.1, outside of the planned SPAs in the Ramona area, there is a limited amount of appropriate space available for a project the size of the Cumming Ranch project. There are large undeveloped parcels, mostly to the northwest of the project area, that may provide for potential purchase of enough parcels to total 400 acres. However, they are located in the middle of the lands delineated by the County for the formation of the Ramona Grasslands Preserve. In addition, access to these areas is more difficult because of their distance from SR 67. It is possible that these areas may also be outside of the RMWD latent sewer service area, and may qualify as prime agricultural land, similar to the proposed project site. Therefore, while outside of RMWD's sphere, development the Cumming Ranch project site is considered to be consistent with criterion (b) of Government Code Section 56377, as the development of nonprime farmlands within the agency's latent sewer service area in-lieu of the proposed project site is not feasible.

Indirect Impacts

The proposed project was designed to maintain and promote the rural atmosphere of the surrounding community. There is farmland in the vicinity of the project site; however, the area also supports many residential uses and other development. The project site is adjacent to the Ramona Town Center and Ramona Airport. The placement of a residential development on the project site would not segregate or divide an intensely farmed area, as the area surrounding the project site is developed with rural residential uses. Surrounding the project site, rural residential homes are typically on lots that allow for nonintensive agricultural uses, such as equestrian facilities and animal husbandry. Animal keeping would be allowed in accordance with County ordinances. The uses proposed for the project would be compatible with the surrounding land uses.

Open space areas would be integrated throughout the project to preserve unique features of the site and help maintain a natural aesthetic. The project also would not interfere with, create barriers, necessitate modifications, inconvenience, or increase cost that would render farming of surrounding lands infeasible. These project features would help to reduce interface impacts with the existing developments surrounding the property. Because the project is designed to integrate with the surrounding property and existing community, it would not create a situation that would indirectly encourage the conversion of farmland to urban use.

The project would extend infrastructure throughout Area A of the project site. However, this infrastructure extension necessary to serve the residential component of the project would not create new opportunity for further development of nearby farmland, as the surrounding areas are already developed with residential uses and the necessary infrastructure is in place to support those residential uses. Project implementation would not result in a demand on resources that would limit the continued viability of agricultural operation in the project vicinity. Therefore, development of the project site and the termination of existing dry-land farming would not encourage the conversion of surrounding farmland. Overall, implementation of the project would result in a ***less-than-significant*** impact related to potential indirect conversion of farmland per Guideline 1.

4.1.3.4 Cumulative Impact Analysis

A list of projects was compiled to analyze the potential cumulative impact of the loss of farmland through implementation of the proposed project, as detailed in the Agricultural Analysis. This cumulative project analysis includes all of the projects on that list, which encompasses the majority of the Ramona Community Plan area, because the rural character and identity of this

area are so strong and important to local residents. As outlined in the Agricultural Analysis, Appendix L, this cumulative list was analyzed for projects that could potentially impact agricultural resources. An estimated 42 projects in the Ramona area have the potential to contribute to a cumulative loss of agricultural resources, and could impact more than 800 acres. The majority of the projects on this list are subdivisions of existing residential lots into multiple lots. However, there are some larger projects that would potentially require the conversion of farmland to residential or other urban use.

As described above, the Cumming Ranch project site does not contain Prime Farmland, Farmland of Statewide Importance, or Unique Farmland as designated by the FMMP. A small area of Prime Farmland is located west of the project site at the southwest corner of the intersection of Highland Valley Road and Traylor Road. This area of Prime Farmland is approximately 1.25 miles west of the Cumming Ranch site. There are also a few small, isolated areas of Unique Farmland designated in areas north of the project site. The majority of the land in the project area is designated as Grazing Land, Urban and Built-Up Land, Other Land, or Farmland of Local Importance. In the Ramona Community Planning Area, which is the area included in the cumulative analysis, there are larger areas of Prime Farmland, Farmland of Statewide Importance, and Unique Farmland located in the western portion of the planning area. There are approximately 500 acres of Prime Farmland, 400 acres of Farmland of Statewide Importance, and 1,500 acres of Unique Farmland located throughout the Ramona Community Planning area, in addition to many other acres of unclassified farmland. Although not all of these farmland acres would be converted with implementation of the cumulative projects, a portion would be developed into nonagricultural uses. Although some areas of important farmland, as designated by the FMMP, may be impacted by future development, many of the cumulative projects propose rural residential uses with larger lot sizes, similar to the proposed project. Agriculture often continues within these rural residential lots in a variety of ways, such as animal keeping, small orchards or row crops, or other small-scale activities. This potential for continued agricultural operations within many of the cumulative projects reduces the possibility of cumulative impacts to agricultural resources in the Ramona area.

The Ramona Community Plan discusses the importance of farmland and agriculture to the local community. The Ramona area is historically known for its farming and ranching activities and lifestyle. The project site itself has been farmed since the 1950s. Although the project would eliminate some of the existing onsite agricultural uses, the project is designed to maintain the rural character of the area and allow for smaller agricultural activities, such as animal keeping, on residential lots within the project. The design of the project is based on preservation of the rural character of the area and maintaining the environmental benefits that currently result from

the agricultural open space on the site. The project site is not planned for agricultural use, as demonstrated by the zoning ordinance and Community Plan designations. Development surrounding the site has reduced the economical viability and feasibility of continued dry-oat-hay farming on the project site. For these reasons, the conversion of the project site from agricultural use would not jeopardize the long-term agricultural goals of the community, and this cumulative impact is ***less than significant*** per Guideline 3.

4.1.3.5 Conclusions

The project would eliminate farming on land that is currently being used for dry farming and grazing. Although used for agricultural purposes, the land is not considered to be Prime Farmland and is not zoned or designated for agricultural use. With implementation of the project design features, such as the designated open space areas and large lot size, the project would maintain the integrity of the rural setting and be compatible with the community character of Ramona. Small family agriculture and animal keeping would be allowed within residential lots. As outlined throughout Subsection 4.1.3.4, implementation of the proposed project would have less-than-significant agricultural impacts through direct, indirect, and cumulative impacts per Guidelines 1, 2, and 3, and mitigation is not required.

4.1.4 Land Use and Planning

This section evaluates the potential land use and planning effects of the proposed project. This section includes a comparison of the existing land uses on the Cumming Ranch site and the surrounding areas, compatibility with the various plans and policies from applicable jurisdictions, and an analysis of the effects of the Cumming Ranch project related to land use and planning issues.

4.1.4.1 Discussion of Existing Conditions Relating to Land Use and Planning

Current Site Use

The Cumming Ranch property has historically been used primarily for cattle grazing and dry-land farming of oat-hay. Portions of the site are still in agricultural production, as described below by individual area. Approximately 400 acres of the 682.6-acre project site are currently used as farmland.

Area A

Current land uses on Area A are a rotation of nonirrigated oat-hay farming and cattle grazing. Natural vegetation occurs on portions of the site that are not conducive to agriculture, such as rocky outcroppings, drainages, and steep slopes. On both sides of Highland Valley Road, farming practices occur on the majority of the land, with the exception of the undesirable areas described above. A series of dirt roads criss-cross Area A, providing access throughout the area. Highland Valley Road bisects Area A from east to west. There are currently no structures on Area A. Remnants of an old cattle chute and a windmill are located in Area A; however, none of these items are operational or currently used.

Area B

This area is used almost entirely for farming, with similar practices to Area A, including dry oat-hay farming and cattle grazing. Area B is generally a flat plain between the Santa Maria and Etcheverry Creeks, and is suitable for farming, with the exception of the creeks and drainages, sensitive vernal pool area, and a few rocky areas along the southern boundary. There are no structures on Area B.

Area C

Area C is not currently in agricultural production due to the vernal pools on that portion of the property. There are 22.2 acres of conservation easements that exist on this 113.1-acre area. Because of the environmental sensitivity of this portion of the site, there are no current agricultural or other uses that occur within the area, and no structures are located on Area C.

Surrounding Land Use

The pattern of adjacent land uses is varied, and the general land use types are shown in Figure 4-3. To the north of the project site is the Ramona Airport. The Ramona Airport supports approximately 130,000 operations each year. CAL FIRE and the U.S. Forest Service jointly operate a fire attack base out of this airport. The project's northern boundary is along Airport Road and also coincides with the Ramona Town Center boundary. The area to the north and northwest is generally undeveloped, with the exception of the airport. This area is known for sensitive vernal pools. Areas adjacent to the northwest edge of the project site have been purchased for inclusion in the Ramona Grasslands Preserve.

Northeast and east of the project site (east of Areas B and C) is the developed portion of the Ramona Town Center. The Ramona Town Center boundary generally coincides with the eastern boundary of Areas B and C, and delineates the more urban portion of Ramona. This area of Ramona is typically developed with single-family homes, typically 1 to 2 acres in size, with some areas of commercial/industrial uses. One of these industrial uses, the SMWWTP, is inset into the eastern boundary of Area B. This plant is designed to treat approximately 1 million gallons of wastewater per day.

In the southeast corner of the project site, along the SR 67 corridor, are generally large parcels of land that are either vacant or used for farming. Parcels between the project site and SR 67 are generally used for cattle grazing; southeast of SR 67 there is additional grazing and some areas of crop production. Small areas of single-family homes are also located southeast of SR 67. SR 67 is a highly traveled road that provides access to Ramona and is the main thoroughfare through the community. Small commercial operations, such as nurseries and farming supply stores, are located along the SR 67 corridor.

Single-family homes continue across the southern boundary of the project area (Area A) and also wrap around to the west side of the project site. Some homes have equestrian or other small animal keeping facilities on their properties. There are a few single-family homes, north of Voorhes Lane, to the northwest of the project site that sit on large parcels, typically 5 acres or more, that support small equestrian or family farming activities. There are no large commercial farming operations in the vicinity of the project site.

Based on review of assessor's parcel information, existing residential lots within 300 feet of the project boundary range in size from 0.55 acre to 14.82 acres. The average lot size is 3.24 acres, and the existing density is 0.31 dwelling units per acre.

Residential lots located north of Highland Valley Road and west of the project site range in size from 0.83 acre to 14.82 acres. The average size of residential lots within this area is 4.57 acres. The density is 0.22 dwelling units per acre. To the east of the project within the Ramona Town Center, lots range from 0.55 acre to 2.49 acres, with an average size of 1.14 acres and a density of 0.87 dwelling units per acre. Existing residential lots within 300 feet south of Highland Valley Road range from 1.08 to 12.65 acres, with an average lot size of 4.27 acres and a density of 0.23 dwelling units per acre. East of the project, north of Highland Valley Road and south of the Ramona Town Center, are several vacant residential parcels and one lot in commercial agricultural use. The average size of developed residential lots within this area is 2.50 acres, with a density of 0.40 dwelling units per acre, as shown below:

Direction from Project	Average Lot Size (acres)	Density*
West	4.57	0.22
East (Town Center)	1.14	0.87
South	4.27	0.23
North of Highland Valley Road	2.5	0.4
All Directions	3.24	0.31
Project Residential Area (188.2 acres)	1.5	0.66
Area A (358.7 acres)	1.5	0.35
Total Project (682.6 acres)	1.5	0.18

*dwelling units per acre

Applicable Regulations and Plans

The Cumming Ranch project site is located within an unincorporated portion of San Diego County, within the Ramona Community Planning Area. The following policy documents govern development in this area and are applicable to the proposed project.

County of San Diego General Plan

The project site is currently designated with a mix of SR-2, SR-10, and RL-40 land use designations in the San Diego County General Plan, and there is currently no approved Specific Plan for the project site. According to the County's General Plan, the Semi-Rural regional category identifies areas of the County that are appropriate for lower density residential neighborhoods, recreation areas, agricultural operations, and related commercial uses that support rural communities. The Rural Lands category is applied to large open space and very-low-density private and publicly owned lands that provide for agriculture, managed resource production, conservation, and recreation, and thereby retain the rural character for which much of the unincorporated County is known (County of San Diego 2011a).

Ramona Community Plan

When the County Board of Supervisors approved the County's General Plan update on August 4, 2011, the project's previous General Plan designation of (21) Specific Plan was replaced with a mix of SR-2, SR-10, and RL-40 land use designations. It also removed project-specific development criteria for the Cumming Ranch project site in the Ramona Community Plan. The former Ramona Community Plan allocated a Specific Plan density of 0.25 dwelling units per acre on the Cumming Ranch project site, and permitted industrial uses and 166 lots ranging from 2 to 4 acres. The updated Ramona Community Plan (August 2011) does not contain any project-

specific criteria for the Cumming Ranch project site, and the updated General Plan land use designations now permit up to 126 single-family residential lots, which yields a density of 0.18 dwelling units per acre (County of San Diego 2011a).

County of San Diego Zoning Ordinance

As shown in Figure 4-4, the San Diego County Zoning Ordinance is applicable to all unincorporated areas of the County. All land; structures; and the construction, reconstruction, alteration, expansion, or relocation of any structures must conform to all regulations established in the Zoning Ordinance.

As shown in Figure 4-4, the Cumming Ranch site is zoned as SPA (S88). Almost the entire area surrounding the project site is zoned as Agriculture, including both A70 and A72 zoning designations. The agricultural zoning extends into the Ramona Town Center and the residential areas developed in the vicinity. A small portion near the northwest corner of the site is zoned as a separate SPA (S88) and extends westward. The area to the north that encompasses the Ramona Airport is zoned as Industrial.

Resource Specific Plans

There are various other regional plans that have jurisdiction over the project site that contain policies and guidelines related to environmental impacts. As discussed in Subchapter 1.5, these plans include the RPO and Light Pollution Code. These resource-specific plans are discussed in the appropriate issue area section, including Subchapter 3.1, Biological Resources; Subchapter 3.2, Cultural Resources; and Subchapter 3.4, Aesthetic and Visual Quality.

4.1.4.2 Guidelines for the Determination of Significance

As stated in the CEQA Guidelines, Section 15358(b), effects analyzed under CEQA must be related to a physical change in the environment. An incompatibility of a project with a plan or policy does not necessarily result in a significant environmental impact. The following significance thresholds focus on the potential for the project to result in environmental impacts. Thresholds were derived from CEQA Guidelines and applicable planning documents such as the County of San Diego General Plan and Ramona Community Plan. The project would have a significant adverse impact relating to land use and planning if it would directly or cumulatively do any of the following:

1. Conflict with applicable environmental plans or policies adopted by agencies with jurisdiction over the project, including the San Diego County General Plan and Ramona Community Plan.
2. Conflict with an adopted land use designation or intensity and result in indirect or secondary environmental impacts related to that conflict.
3. Result in land use incompatibilities that would result in indirect or secondary environmental impacts.

4.1.4.3 Analysis of Project Effects and Determination of Significant Impact

To fully evaluate potential land use and planning effects, all applicable policies in the Ramona Community Plan were considered. Due to the large number of policies that are applicable to the project, the policy analysis is provided in Appendix M, which includes a detailed analysis of how the project complies with the policies of the Ramona Community Plan. Overall, the project allows for orderly residential development on the site in a manner that is fitting with the community character of Ramona and the goals of the Community Plan. Therefore, because the project is compliant with the Ramona Community Plan, its impacts are ***less than significant***.

Inconsistency with Required Lot Size

The proposed project would develop residential lots ranging in size from approximately 1 acre to more than 3.1 acres, with an average residential lot size of 1.5 acres. Although the former Ramona Community Plan specified a 2-acre minimum lot size, the updated Ramona Community Plan does not specify a minimum lot size for the Cumming Ranch project site. The Cumming Ranch project would provide development characteristic of a rural setting, with a density that is less than what is allowed by the current General Plan designations (0.18, or about one residence per 5 acres). The project contains residences that are grouped together, not clustered, on 1- to 3.1-acre lots, with the average residential lot size being 1.5 acres. These residential lots are bordered by 8 large open space lots, resulting in the appearance of openness, with the average lot size of Area A being 2.9 acres. While some lots are smaller than other surrounding rural residential lots, the project design includes significant open space; no street lights; the keeping of horses and other large animals; agricultural use; and preservation of significant hills, drainages, and other natural features such that the community will view mostly open rural space from public viewpoints.

The project would also be compatible with confined agriculture practices, as many agriculture activities in the County occur on residential lots of 1 acre or more. For example, in Ramona,

small parcels with a single-family residence and small farming or equestrian use is common. Because of their direct involvement in agriculture or a rural lifestyle, these residential lot types tend to be very compatible with agriculture. In the County, economically productive agriculture is conducted on small farms, with 63% of farms ranging from 1 to 9 acres in size, 77% of farmers living on their farms, and 92% of farms being family owned (County of San Diego 1997). Therefore, the proposed lot sizes allow for small family farming practices within lots, which is an important community element in Ramona. For these reasons, a ***less-than-significant*** impact would result.

Inconsistency with Noise Levels

As summarized in Table M-1 in Appendix M, there would be an inconsistency with the Ramona Community Plan policy Noise 3. This policy states that mitigation devices for new development would be required to return ambient noise level to 60 dBA CNEL if this level is exceeded. As discussed in Subchapter 3.3, Noise, the project was determined to result in a potentially significant noise impact (**Impact N-5**) because certain receptors would be within projected noise contours from traffic that would exceed 60 dBA CNEL. Mitigation is provided in Subchapter 3.3 that would require abatement to reduce future noise levels at those receptors to below 60 dBA CNEL. It is not feasible to reduce the ambient noise levels across the entire site to less the 60 dBA CNEL; however, the noise impact for individual receptors would be reduced to less than significant. For these reasons, this policy inconsistency would result in a ***less-than-significant*** impact per Guideline 3.

Compliance with County RPO

Installation of the project sewer system, trail system, and secondary emergency access/egress roads would require several crossings of RPO wetland areas. Appropriate findings must be made to allow RPO wetlands crossings. Statements of fact for each of the six required findings are found in Section 3.1.3.

These findings indicate that the project has met all criteria required for RPO crossings, and there would be a ***less-than-significant*** land use impact specific to the County RPO policy per Guideline 1.

4.1.4.4 Cumulative Impact Analysis

The cumulative study area for land use and planning was determined to be the Ramona Community Planning Area. It is necessary to cumulatively consider the proposed project within

the complete context of the applicable planning documents with jurisdiction over the project site and the whole area encompassed by those planning documents. For this reason, the Ramona Community Planning Area was used as the study area for the cumulative analysis. The proposed project would not result in any significant land use or planning inconsistencies that would cause environmental effects. The proposed project would result in a residential development slightly smaller in size than that currently outlined in the Ramona Community Plan; however, it is compatible with the surrounding area. As discussed above, the inconsistencies between the guiding policies and the proposed project would not result in additional environmental impacts; rather, the resulting change in policy may reduce potential impacts.

The project would not contribute to cumulative land use impacts related to loosing the rural character of Ramona (see above) or the integrity of the Ramona Grasslands (see Section 3.1.4). The project includes conservation of 67 percent of the property as open space and most of this conservation area would contribute to the Ramona Grasslands Preserve. The project's open space would be managed with conservation and ecological objectives resulting in higher habitat values overtime. The project includes features consistent with the community character related to dark skies and noise. Potential traffic impacts are mitigated to less than significant or in the case of SR 67, to pre-project conditions. In addition, because the project is consistent with the General Plan and the guiding policies, it would not contribute to significant cumulative impacts concerning environmental impacts resulting from land use and planning issues.

4.1.4.5 Conclusions

As outlined above in Subsection 4.1.4.3, the proposed project would have some inconsistencies with applicable policies and guidelines, such as lot size and noise requirements. However, these policy inconsistencies would not cause environmental impacts per Guidelines 1, 2, or 3. Therefore, impacts would ***be less than significant***, and mitigation is not required.

4.1.5 Population and Housing (excluding Growth Inducement)

Appendix G of the CEQA Guidelines relates to whether projects would induce substantial population growth in an area either directly or indirectly. Subchapter 1.7 of this EIR contains a full analysis of potential growth-inducing impacts, and found that the project would not be growth inducing.

4.1.5.1 Discussion of Existing Conditions Relating to Population and Housing

The project site currently has no housing units located within the site boundaries. The site is currently and has historically been used for agricultural activities. No residential population is located on the project site or is supported by the project site.

4.1.5.2 Guidelines for the Determination of Significance

The guidelines for the determination of significance are taken from Appendix G of the CEQA Guidelines. The project would have a significant adverse impact with regard to population and housing if it would directly or cumulatively do any of the following:

1. Induce substantial population growth in an area, either directly or indirectly.
2. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere.
3. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere.

4.1.5.3 Analysis of Project Effects and Determination of Significant Impact

As described at the beginning of this section, Guideline 1, regarding population growth, was analyzed within Subchapter 1.7 of this EIR. It was determined that the project would not be growth inducing and, thus, would not conflict with Guideline 1.

The questions concerning population and housing, as outlined in Appendix G of the CEQA Guidelines, ask whether the proposed project would displace a substantial number of existing homes or displace a substantial number of people, resulting in the construction of replacement housing elsewhere. Because there are no existing homes on the project site, the proposed project would not displace existing homes or people, and would have no potential impact on existing population or housing. The project would not conflict with Guideline 2 or 3, and would have ***no impact*** to population and housing.

4.1.5.4 Cumulative Impact Analysis

The study area considered for population and housing cumulative impact analysis is the Ramona Community Planning Area. This study area was chosen as it is necessary to consider the community as a whole related to the population and housing situation of the area.

As shown by the types of projects included on the cumulative projects list, housing is being developed throughout the Ramona area. The development of new housing units is in response to demand, and is not creating substantial population growth through the provision of residential units, per Guideline 1. There are almost no projects that would displace existing housing or people and necessitate the need for new replacement housing to be constructed elsewhere. Therefore, there would be no cumulative conflict with Guideline 2 or 3, and ***no significant cumulative*** impact would result.

4.1.5.5 Conclusions

The project would not conflict with Population and Housing Guidelines 1, 2, or 3, as there is currently no housing on the project site, and no new housing would be required elsewhere as a result of the project. The project is not growth inducing, as determined in Subchapter 1.7 of this EIR. Therefore, there would be no impacts related to population and housing.

4.1.6 Mineral Resources

4.1.6.1 Discussion of Existing Conditions Relating to Mineral Resources

There is currently no mining or mineral extraction that occurs on or near the project site. However, potential loss of availability of a known mineral resource of value to the region or the loss of a locally important mineral resources recovery site must be evaluated. The Ramona Community Plan delineates a Resources Conservation Area related to mineral resources known as the Ramona Pegmatite District. This is a regionally important mineral resource as gem-quality tourmaline, topaz, garnet, beryl, and smoky quartz have been mined from this area. The Ramona Pegmatite District is located northeast of the Ramona Town Center, approximately 6 miles northeast of the project site. The site is designated Mineral Resource Zone-3 (MRZ-3). MRZ-3 areas may contain known mineral deposits that may qualify as mineral resources. Further exploration work within this area is not likely to result in the reclassification of specific localities into the MRZ-2 category because of the site's proximity to the downtown Ramona area where development of MRZ-2 lands would result in significant traffic, noise, and air quality impacts.

4.1.6.2 Guidelines for the Determination of Significance

The guidelines for the determination of significance are taken from Appendix G of the CEQA Guidelines. The project would have a significant adverse impact with regard to mineral resources if it would directly or cumulatively do either of the following:

1. Result in the loss of availability of known mineral resources that would be of value to the region and the residents of the state.
2. Result in the loss of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan.

4.1.6.3 Analysis of Project Effects and Determination of Significant Impact

The project site is not located within or adjacent to the Ramona Pegmatite District. Although the site is designated as MRZ-3, currently, no mineral extraction occurs onsite, and no significant mineral resources are known to exist onsite. For these reasons, the project would not conflict with Guideline 1 or 2, and the proposed project would have no impact on mineral resources.

4.1.6.4 Cumulative Impact Analysis

The cumulative study area for this topic was determined to be the Ramona Community Planning Area to encompass the Ramona Pegmatite District and fully consider regionally important mineral resources.

Because the Cumming Ranch project is not within an area of important mineral resources, development of the site would not contribute to a cumulative impact to important mineral resources in the area. Any cumulative projects that would take place within the Ramona Pegmatite District would be subject to all policies and/or restrictions of the Resource Conservation Area, as outlined in the Ramona Community Plan. There would be no conflict with Guideline 1 or 2; therefore, ***no significant cumulative*** impact would result.

4.1.6.5 Conclusions

The project would not conflict with Guideline 1 or 2, as the project site is not currently mined for minerals and is not located in an area known to have valuable mineral resources. Therefore, there would be no impact related to mineral resources.

4.1.7 Soils and Geology

This section includes a description of the existing geologic and soil conditions at the Cumming Ranch site. Following this discussion, an analysis of the potential geologic hazards associated with development of the project site is provided. The information in this section is based on the Preliminary Geotechnical Evaluation prepared for the project (GeoSoils 2004). This section

focuses generally on Area A, which is where development would occur with implementation of the project. Erosion and sedimentation issues are addressed in Subsection 4.1.1, Hydrology and Water Quality.

4.1.7.1 Discussion of Existing Conditions Relating to Soils and Geology

Soils

A soil survey was prepared for the County that includes a map of soils found at the project site (USDA 1973). This map indicates that 11 soil series exist within Area A of the project site. Table 4-9 summarizes the soils that are present on Area A and their characteristics.

Geology

The San Diego area is underlain by three principal geologic provinces. The majority of the County, including the project site, is in the Peninsular Ranges province bounded by the coastal province to the west and the Salton trough province to the east. The western edge of the Peninsular Ranges province corresponds with the eastern hills and mountains along the edge of Poway, Lakeside, and El Cajon. Extending east of Julian and Jacumba, the province abruptly ends along a series of faults. The Peninsular Ranges are characterized by steep elongated mountain ranges and valleys that trend northwesterly.

Area A appears to be underlain by Cretaceous-age granitic bedrock with relatively thin surface deposits of topsoil/colluvium, alluvium, and older alluvium (GeoSoils 2004). The granitic bedrock may be encountered at, or near, existing grades and beneath deposits of topsoil/colluvium or alluvium. Bedrock materials are generally weathered to rounded, fractured surficial outcrops throughout the site.

Geologic Hazards

Seismic Activity

The San Diego region is located in a seismically active area, with multiple fault lines transecting the region. An earthquake is the type of major disaster most likely to affect a large area of the County (County of San Diego 1991b). The nearest fault zone to the project site is the Elsinore Fault. The Elsinore Fault is the closest active fault to the San Diego area, and represents a serious earthquake hazard for most of the populated areas of San Diego County. This fault is located approximately 16 miles east of the project site. The Elsinore Fault is approximately 135 miles

long and is capable of generating an earthquake of magnitude 7.4 on the Richter scale. Depending on which segment moved, considerable damage may occur in Escondido, Ramona, Julian, Borrego, and Jacumba (County of San Diego 1991b). The Ramona area contains several faults that are classified as inferred faults. A series of parallel northwest-trending faults are located in the northwest end of Santa Maria Valley. A series of east-west-trending faults are found in the San Vicente Valley and vicinity. The south side of Mount Woodson is bordered by the Warren Canyon Fault, which continues eastward along the south side of the Santa Maria Valley. Numerous lineaments are found throughout the Ramona Community Planning Area. In addition to these mapped faults, it is surmised that smaller faults probably exist in the rock beneath the soil surface (County of San Diego 2002b)

The project site is not located within a fault-rupture hazard zone as identified by the Alquist-Priolo Earthquake Fault Zoning Act (Hart and Bryant 1997). There are no known active faults crossing the Cumming Ranch site within the area proposed for development (GeoSoils 2004).

Landslides

Landslides, or mass wasting, are a type of erosion in which masses of earth and rock move down-slope as a unit. The project site contains relatively steep natural slopes through the center of Area A. Common failures within natural slopes formed in granitic bedrock are rock fall, debris flow, and plane-wedge failure. Natural slopes onsite are considered stable due to their relatively thin soil mantle and dense granitic bedrock core (GeoSoils 2004).

Regulatory Framework

Alquist-Priolo Earthquake Fault Zoning Act

The primary purpose of the Alquist-Priolo Earthquake Fault Zoning Act is to prohibit most new structures for human occupancy from being constructed across active faults, thereby mitigating the hazard of fault rupture. This act mandated that the state geologist delineate “Earthquake Fault Zones” along known active faults in California. A fault is defined as being active if it has had surface displacement within Holocene time (about the last 11,000 years). The Cumming Ranch site is not located within an Alquist-Priolo Earthquake Fault Zone.

Seismic Hazards Mapping Act and CDMG Special Publication 117

The California Division of Mines and Geology Special Publication 117 was adopted on March 13, 1997, by the State Mining and Geology Board in accordance with the Seismic Hazards Mapping Act of 1990. The purpose of the act is to protect the public from the effects of strong

ground shaking, liquefaction, landslides, or other ground failure, and other hazards caused by earthquakes. Under the act, the state geologist is required to delineate the various "seismic hazard zones." Cities and counties, or other local permitting authority, must regulate certain development projects within these zones. The Cumming Ranch project is not located within a seismic hazard zone.

San Diego County General Plan

The County has goals and policies in its General Plan pertaining to the geologic hazards within the County. The County specifically addresses the issue of seismic safety in the Safety Element of the General Plan (County of San Diego 2011a). The purpose of the Geological Hazards section of the Safety Element is to identify and evaluate hazards and establish policies to guide efforts to minimize the risk from these hazards. These policies are provided to introduce safety considerations into the planning and decision-making process to reduce the risk of injury or loss of property associated with the hazards.

Uniform Building Code

The Uniform Building Code (UBC) is a national building code published by the International Conference of Building Officials. It was adopted, in part, by municipalities throughout the United States, including the County. The UBC provides a set of regulations covering all major aspects of building design and construction relating to fire, life safety, and structural safety. The California Building Code guidelines are derived from the UBC and encompass criteria specific to California, including geologic and seismic characteristics.

4.1.7.2 Guidelines for the Determination of Significance

The guidelines for determination of significant of geologic hazards are based on the analysis questions for geology found in Appendix G of the CEQA Guidelines. The project would have a significant adverse effect on the issue of soils and geology if it would do the following:

1. Directly or cumulatively expose people or structures to potential substantial adverse effects involving
   (a) unsuitable soils,
   (b) known earthquake fault,
   (c) seismic ground-shaking or ground failure,
   (d) liquefaction, or
   (e) landslides.

4.1.7.3 Analysis of Project Effects and Determination of Significant Impact

Soils

As shown in Table 4-9, two soil types mapped onsite have a high shrink-swell behavior, indicating expansive soil characteristics. The two expansive soils are located along the northwestern boundary of Area A and along the drainage area in the southern portion of the site. These areas are generally not planned for development of residential pads, although these soils may partially extend into development areas. However, soil testing done by GeoSoils found that soils onsite in development areas are generally considered to have very low expansive characteristics (GeoSoils 2004).

The development limitations for residences of all soils onsite, except Cieneba very rocky coarse sandy loam, are considered to be slight to moderate, as shown in Table 4-9. This means that residential structures could be built on these soils using standard construction and engineering practices, and no extreme measures would be required. Cieneba very rocky coarse sandy loam has a high development limitation due to rockiness and slope (USDA 1973). This soil type is located along the main ridgeline through the central portion of Area A, and no development is planned on this ridgeline area.

In general, the overall geotechnical concerns related to the onsite soils and underlying materials includes the potential for onsite soil types that may be unsuitable to support settlement-sensitive structures, such as homes. This means that homes built on these soils could be subject to significant settlement issues such as cracking, which could result in structurally unsafe conditions. Compounding this concern is that materials considered competent to bear the weight and maintain the integrity of residential structures may be located at great depths below the surface of the ground. These potential soil characteristics may result in unsafe conditions; however, the California Building Code and UBC requires that all appropriate soils testing be completed and the application of standard engineering requirements be met to ensure structurally sound building foundations. Prior to approval of the proposed project, site-specific engineering measures would be required to address soils-suitability hazards. Engineering details and specifications would include those identified in the Preliminary Geotechnical Evaluation (GeoSoils 2004) or others, as deemed appropriate by the County engineer. The following is a list of the engineering measures that would be implemented for the project:

a. The geotechnical engineer shall selectively test fill during site preparation and review any unusual or unexpected conditions and recommend measures, if necessary.

b. During site preparation, soil removal shall include existing colluvium, alluvium, older alluvium, and highly weathered bedrock onsite. The exposed surface shall be reprocessed prior to the addition of fill.

c. If soil imports are required, samples of the soil shall be evaluated by a geotechnical engineer to ensure compatibility with onsite soils and the recommendations of the geotechnical report.

d. Remedial earthwork, including lot capping and cut/fill transitions, shall be implemented with further evaluation of conditions in the field as grading occurs.

e. An erosion-control fabric or similar protective system shall be placed over graded slope faces to minimize erosion of the slope face until a suitable vegetation cover is established.

f. All cut slopes shall be mapped by the project engineering geologist during grading to allow amendments to mitigation, as necessary.

Additional or alternative measures may be required by the County engineer to ensure soils are appropriately engineered and stabilized prior to development. With project implementation of these engineering requirements, conformance with applicable regulations, and integration of future site engineering recommendations, the potential soils impact would be ***less than significant*** per Guideline 1(a).

Geologic Hazards

Seismic Activity

The project site is not located within any currently established Alquist-Priolo Earthquake Fault Zone, and no active faults are known to underlie the project development area. However, the possibility of seismic activity at the site may be considered as approximately similar to the Southern California region as a whole. Other seismic-related hazards that were considered during the geotechnical evaluation of the project site include liquefaction, tsunami, surface fault rupture, ground lurching, and seiche. These potential hazards were found to be negligible (GeoSoils 2004). The project would be required to meet all applicable seismic safety standards and regulations, including adhering to California Building Code and UBC building design and construction requirements. By conforming to all seismic safety requirements, the project would result in a ***less-than-significant*** impact related to seismic activity per Guidelines 1(b), (c), and (d).

Landslides

The existing natural slopes on the project site consist of a dense bedrock core with only a thin layer of soil on top. Because the bedrock is considered stable and there is very little soil that could slide, the potential for a landslide onsite is not substantial. In addition, there is a lack of past landslide deposits on the project site, and the project was designed to avoid development on steep slopes. For these reasons, the project would result in a ***less-than-significant*** impact related to the potential for landslides per Guideline 1(e).

4.1.7.4 Cumulative Impact Analysis

Although geology is a regional topic with geologic features sometimes spanning large areas, impacts to soils and geology are typically site specific. Construction of a project in extreme geologic conditions, such as very steep slopes, may have the potential to impact surrounding areas. However, this situation is generally avoided by required conformance with the California Building Code, UBC, and other applicable regulations. For this reason, the cumulative study area for this topic is considered to be the area immediately surrounding the project site. There are three cumulative projects in immediate proximity to the project site (cumulative projects #10, 17, and 76 in Table 1-7 and shown in Figure 1-17). These projects include a new church, expansion of an existing church facility, and a residential lot subdivision.

The potential soils and geology impacts from the proposed project would impact only onsite development, because there are no significant geologic landforms or conditions that would be altered by project development, such as steep slopes or hillsides, that could cause geologic conditions to become hazardous to the surrounding cumulative projects. Similarly, the three cumulative projects in the immediate vicinity of the Cumming Ranch project are not located on substantial or hazardous geologic formations, or propose development that might significantly impact soil stability or geologic conditions. All development projects would be subject to the California Building Code, UBC, and any other applicable regulations requiring proper engineering and design to reduce potential for geologic hazards to result. For these reasons, implementation of the Cumming Ranch project along with the other three projects in the immediate vicinity of the proposed project would not create unstable geologic conditions in the surrounding area or impact soils offsite of each individual project area; therefore, ***no cumulative impact*** would result per Guidelines 1(a) through (e).

4.1.7.5 Conclusions

Many potential geologic hazards are avoided because the project does not propose development on steep slopes or hillsides. The soils and geology of the site are conducive for safe development. The potential for an unstable soils would be addressed through proper soil engineering. Adequate soil engineering allows for homes and other structures to be built in a safe manner on soil that is not ideal for construction. Additional requirements, such as California Building Code and UBC regulations, and future site engineering recommendations would also be implemented as part of the project. For these reasons, the project would result in less-than-significant impacts related to soils and geology as outlined in Guidelines 1(a) through (e).

4.1.8 Air Quality

This section summarizes the air quality study (EDAW 2008b) completed for the Cumming Ranch project, which is included as Appendix H. This section describes the existing air quality and identifies the air quality effects of development of the proposed project. More detail on the methodology to develop this analysis and background information and data are included in the air quality study provided in Appendix H.

4.1.8.1 Discussion of Existing Conditions Relating to Air Quality

Sensitive Air Quality Receptors

Sensitive air quality receptors are land uses where persons are especially sensitive to elevated pollutant concentrations. Sensitive air quality receptors include the elderly and the sick. For the purposes of CEQA analysis, the County also defines sensitive receptors to include residents. There are residences adjacent to the north, west, southwest, and southeast of the project site. Sensitive land uses are schools, hospitals, resident health care facilities, and day care centers. No sensitive land uses were identified within 1 mile of the project boundaries.

Applicable Regulations and Standards

Federal and State Standards

The Federal CAA (U.S. Code Section 7401) requires the adoption of National Ambient Air Quality Standards (NAAQS) to protect the public health, safety, and welfare from known or anticipated effects of air pollution. The NAAQS have been updated occasionally. Current standards are set for sulfur dioxide (SO_2), carbon monoxide (CO), nitrogen dioxide (NO_2), ozone

(O_3), suspended particular matter (PM_{10}), fine particular matter ($PM_{2.5}$), lead (Pb). These pollutants are collectively referred to as criteria pollutants. CARB has established additional standards that are generally more restrictive than the NAAQS. Federal and state standards are shown in Table 4-10.

Regional Standards

In San Diego County, the SDAPCD is the agency responsible for protecting the public health and welfare through the administration of federal and state air quality laws and policies. Included in the SDAPCD's tasks are monitoring air pollution, preparation of the San Diego County portion of the State Implementation Plan (SIP), and promulgation of the Rules and Regulations. The SIP includes strategies and tactics to be used to attain and maintain acceptable air quality in the county; this list of strategies is called the Regional Air Quality Strategy (RAQS). The Rules and Regulations include procedures and requirements to control the emission of pollutants and prevent significant adverse impacts.

Regional and Local Air Quality

Specific geographic areas are classified as either "attainment" or "nonattainment" areas for each pollutant based on the comparison of measured data with federal and state standards. If an area is redesignated from nonattainment to attainment, the CAA requires a revision to the SIP, called a "maintenance plan," to demonstrate how the air quality standard will be maintained for at least 10 years.

The SDAB currently meets the federal standards for all criteria pollutants except O_3, and meets state standards for all criteria pollutants except O_3, $PM_{10,}$ and $PM_{2.5}$. For the federal 8-hour O_3 standard, the SDAB is classified as "basic" nonattainment. Basic is the least severe of the six degrees of O_3 nonattainment. The SDAPCD submitted an air quality plan to USEPA in June 2007; the plan demonstrates how the 8-hour O_3 standard would be attained by 2009. A decision from USEPA was anticipated the summer or fall of 2009; however, USEPA is currently in the process of reclassifying California air basins for the 0.075 parts per million (ppm) 8-hour O_3 standard. It is anticipated that USEPA will issue a final ruling for the new classification of the SDAB in 2010, which would then trigger a 12-month period for the SDAPCD to develop an air quality attainment plan according to the new classification and nullify the previous 2007 air quality plan (Reider 2010).

The SDAB is currently classified as a state "serious" O_3 nonattainment area and a state nonattainment area for PM_{10}. The SDAB currently falls under a federal "maintenance plan" for CO, following a 1998 redesignation as a CO attainment area.

4.1.8.2 Guidelines for the Determination of Significance

The guidelines for determination of significance for air quality impacts are based on Appendix G of the CEQA Guidelines and quantitative thresholds established by the County (County of San Diego 2007b). The Cumming Ranch project would create a significant air quality impact if it would do any of the following:

1. Conflict with or obstruct the implementation of the San Diego RAQS or applicable portions of the SIP as a direct result of the project.
2. Result in direct emissions that would violate any federal or state ambient air quality standards or contribute substantially to an existing or projected air quality violation.
3. Result in a cumulatively considerable net increase in the emissions of any criteria pollutant for which the project region is in nonattainment under applicable federal or state ambient air quality standards. Specifically, would the emissions of the proposed project exceed quantitative thresholds for O_3 precursors, oxides of nitrogen (NO_X), volatile organic compounds (VOC), or PM_{10} or $PM_{2.5}$?

   Quantitative thresholds for the emissions of criteria pollutants have been established by the County, as shown below (County of San Diego 2007b).

Pollutant	Total Emissions		
	Pounds Per Hour	**Pounds per Day**	**Tons per Year**
Respirable Particulate Matter (PM_{10})	---	100	15
Fine Particulate Matter ($PM_{2.5}$)	---	55[1]	10[1]
Oxides of Nitrogen (NO_X)	25	250	40
Oxides of Sulfur (SO_X)	25	250	40
Carbon Monoxide (CO)	100	550	100
Lead and Lead Compounds	---	3.2	0.6
Volatile Organic Compounds (VOCs)	---	75[2]	13.7[3]

[1] USEPA "Proposed Rule to Implement the Fine Particle National Ambient Air Quality Standards" published September 8, 2005. Also used by the SCAQMD.
[2] Threshold for VOCs based on threshold of significance for VOCs from the South Coast Air Quality Management District for Coachella Valley.
[3] 13.7 tons per year threshold based on 75 pounds per day multiplied by 365 days per year and divided by 2,000 pounds per ton.

These thresholds are used for significance determinations associated with Guidelines 1, 2, and 3, above.

4. Result in a cumulatively considerable temporary increase of emissions of any criteria pollutant for which the project region is in nonattainment under applicable federal or state ambient air quality standard that was not accounted for in the RAQS.

5. Place sensitive receptors, including schools, hospitals, residential care facilities, or day care centers, near CO hotspots or create CO hotspots near sensitive receptors either directly or cumulatively.

6. Expose sensitive receptors to TAC resulting in a maximum incremental cancer risk greater than 1 in 1 million, or a health hazard index greater than 1.

7. Create objectionable odors affecting a substantial number of people.

4.1.8.3 Analysis of Project Effects and Determination of Significant Impact

Regional Emissions – Construction and Operation

A summary of the regional emissions associated with the project is provided in Table 4-11. Because the construction and operational phases of the project would overlap, the table shows the combined emissions of construction and operation of the project, up until the project is fully operational, which is projected as 2012.

Operations emissions also come from area sources, including gas for residential space heating and water heating, fireplaces, gasoline-powered landscaping and maintenance equipment, and consumer products such as household cleaners. It was assumed that 85% of the homes would operate natural gas fireplaces, 10% would have wood stoves, and 5% would have wood fireplaces (these percentages are the standard assumptions used in the software program URBEMIS 2007).

The primary sources of air pollutants during construction would be engine exhaust from construction equipment and fugitive dust from grading activities. The operation of construction equipment and vehicles would result in emissions of CO, NO_X, VOC, SO_X, PM_{10}, and $PM_{2.5}$. Most equipment would be diesel powered, which would emit more NO_X, SO_X, and PM_{10}, and less hydrocarbons and CO compared to equivalent gasoline-powered equipment.

The proposed project would phase construction efforts so that some road construction and utility installation would occur prior to grading or construction of the proposed housing. Construction of the homes may begin as soon as the pads are graded. Thus, a reasonable worst-case air quality

scenario would occur during the initial year of development when roadway construction, utility installation, building pad grading, and building construction would overlap. This would be the dominant pattern south of Highland Valley Road. North of Highland Valley Road, it is likely that while some of the pads would be graded in groups prior to building construction, the majority of lots would be graded individually, and then the structure would be erected as the individual lots are sold. This style of development would result in much less intense construction activity than a more concerted effort such as envisioned south of Highland Valley Road. Full detail of assumptions used in the air quality modeling are provided in the Air Quality Study (Appendix H).

Using the assumptions outlined in the air quality study, construction emissions related to the roadway construction portion of the project were estimated using the Road Construction Model, version 5.2. Grading and building construction emissions for the project were evaluated using the emissions program URBEMIS 2007. For the URBEMIS calculation of fugitive dust emissions from grading, the model input included dust suppression by watering active grading areas three times a day, which is a design feature of the proposed project. In addition to daily watering, the following measures would be incorporated into the project design and specified on the grading plan to minimize the emissions of PM_{10}, and $PM_{2.5}$: minimize land disturbance; stabilize graded areas as quickly as possible to minimize fugitive dust; apply chemical stabilizer or pave the last 100 feet of internal travel path within the construction site prior to public road entry; install wheel washers adjacent to a paved apron prior to vehicle entry on public roads; remove any visible track-out into traveled public streets within 30 minutes of occurrence; wet wash the construction access point at the end of each workday if any vehicle travel on unpaved surfaces occurred; provide sufficient perimeter erosion control to prevent washout of silty material onto public roads; cover haul trucks or maintain at least 12 inches of freeboard to reduce blow-off during hauling; suspend all soil disturbance and travel on unpaved surfaces if winds exceed 25 mph; cover/water onsite stockpiles of excavated material; hydroseed, landscape, or develop disturbed areas as quickly as possible and as directed by the County to reduce dust generation; and enforce a 15 mph speed limit on unpaved surfaces. These dust-suppression project features were not included in the URBEMIS calculations of fugitive dust emission.

Operational emissions come from mobile sources, that is, vehicle operations associated with the new housing. Operations emissions were estimated using URBEMIS 2007. Mobile source emissions are a function of the number and type of vehicles, as well as the number of trips and miles traveled by vehicles.

The reasonable worst-case construction and operations air pollutant emissions are shown in Table 4-11. The forecast emissions would not exceed the County screening level thresholds for daily emissions, as outlined above in Subsection 4.1.8.2. Therefore, construction and operations

emissions would not have the potential to violate air quality standards or contribute to existing or projected violations of standards. The impact would be ***less than significant*** according to Guidelines 1 and 2.

Local Carbon Monoxide Emissions

Procedures and guidelines for use in evaluating the potential local level of CO impacts of a project are contained in Transportation Project-Level Carbon Monoxide Protocol (Protocol) (UCD ITS 1997). Signalized intersections that would operate at LOS E or F should be analyzed for potential local high concentrations of CO. Based on a review of the project traffic study (Appendix A), four signalized intersections would operate at LOS E or LOS F: SR 67/Highland Valley Road, SR 67/Montecito Road, SR 67/SR 78, and SR 67/Scripps Poway Parkway.

The results of the CO hot-spot modeling (Table 4-12) indicate that the increased traffic volumes resulting from the proposed project would not create a CO hot spot at the intersection of SR 67/Highland Valley Road. The future traffic volumes at the SR 67/Montecito Road, SR 67/SR 78, and SR 67/Scripps Poway Parkway intersections would be similar to those at the SR 67/Highland Valley Road intersection. Because the analysis of SR 67/Highland Valley Road shows future values well below the Guidelines and less than existing values, it is concluded that the values would be similar at the SR 67/Montecito Road, SR 67/SR 78, and SR 67/Scripps Poway Parkway intersections. Therefore, the proposed project's impact to local CO concentrations would be ***less than significant*** according to Guideline 5.

Diesel Exhaust Emissions

Construction of the project and associated infrastructure would result in short-term diesel exhaust emissions from onsite heavy-duty equipment. Particulate exhaust emissions from diesel-fueled engines (diesel PM) were identified as TACs by CARB in 1998. Construction of the project would result in the generation of diesel PM emissions from the use of off-road diesel equipment required for site grading and excavation, paving, and other construction activities, and on-road diesel equipment used to bring materials to and from the project site.

Generation of diesel PM from construction projects typically occurs in a single area for a short period. Construction of the proposed project would occur over a multiyear period, but use of diesel-powered construction equipment in any one area would likely occur for no more than a few months and would cease when construction is completed in that area. The risks estimated for a maximally exposed individual are higher if a fixed exposure occurs over a longer period of time. According to the Office of Environmental Health Hazard Assessment, health risk

assessments, which determine the exposure of sensitive receptors to toxic emissions, should be based on a 70-year exposure period; however, such assessments should be limited to the period/duration of activities associated with the project. Thus, if the duration of proposed construction activities near any sensitive receptor were 8 months, the exposure would be less than 1% of the total exposure period used for health risk calculation. Using conservative assumptions as detailed in the air quality study, a quantitative assessment of health risk associated with construction of the proposed project was prepared using the SCREEN 3 model. The results of this modeling found that the cancer risk would be less than 1 in 1 million, and the hazard index would be less than 1. Because these values would not exceed Guideline 6, this impact would be ***less than significant***.

Odors

Odors are one of the most obvious forms of air pollution to the general public. Odors can present a significant problem for both the source and the surrounding community. A potential source for odor from the proposed project would be the required lift station associated with the wastewater system. When wastewater swirls and mixes, it releases odors and sulfurous gasses, and could potentially create odors at nearby residences. The proposed location of the lift station lot, immediately surrounded by open space, would be approximately 100 feet east of Lot 125, 250 feet northeast of Lot 110, and approximately 150 feet south of the northern boundary of Area A. Due to proximity to residences, the project includes installation of standard odor-control devices on the lift station. Potential types of odor control could include dry scrubbers, wet scrubbers, and/or biofilters. The odor control must comply with the standards set in the California Health and Safety Code, Air Pollution Control District Rule 51, and County Zoning Ordinance. The Minor Use Permit required for installation of the lift station would require that the sewer lift station be equipped with odor-control filters or other equipment as necessary to avoid unpleasant odors to nearby receptors and provide ongoing compliance with applicable regulations. As proposed by the project and required by the Minor Use Permit for the lift station, odor-control devices would be installed on the lift station, and the potential for odor impacts at nearby residences would be ***less than significant*** according to Guideline 7.

4.1.8.4 Cumulative Impact Analysis

Air quality is typically considered to be a regional issue, as pollutants can travel long distances, regardless of jurisdictional boundaries. For this reason, there is cumulative analysis of regional air quality throughout San Diego County. However, localized air quality impacts can result from numerous construction projects in a small area. Therefore, specific localized air impacts are also analyzed in this cumulative scenario.

Ozone and Ozone Precursors

The County provides the following guidance for the assessment of cumulative air quality impacts:

> "It is assumed that a project which conforms to the County of San Diego General Plan, and does not have emissions exceeding the SLTs [screening-level thresholds], will not create a cumulatively considerable net increase in criteria pollutants since the emissions were accounted for in the RAQS" (County of San Diego 2007b).

As discussed below, the project would conform to the General Plan and the RAQS. As shown in Table 4-13, emissions would not exceed the screening-level thresholds. Therefore, the project would not create a cumulatively considerable net increase in O_3 or its precursor pollutants, and the impact would be ***less than significant*** according to Guidelines 3 and 4.

PM_{10} and $PM_{2.5}$

The discussion above is valid for cumulative impacts of O_3 and O_3 precursor pollutants because the RAQS is addressed to attainment of the state and federal O_3 standards. The RAQS does not address PM_{10} or $PM_{2.5}$, which are state nonattainment pollutants. The County provides the following guidance for the assessment of construction phase PM_{10} and $PM_{2.5}$ impacts:

> "[A] project may still have a cumulatively considerable impact on air quality if the emissions of concern from the proposed project, in combination with the emissions of concern from other proposed projects or reasonably foreseeable future projects within a proximity relevant to the pollutants of concern, are in excess of the guidelines."

The specified guidelines are emissions of 100 pounds per day of PM_{10} and 55 pounds per day of $PM_{2.5}$.

As shown in Table 4-11, calculated maximum onsite dust emissions would be approximately 72 pounds per day of PM_{10} and 22 pounds per day of $PM_{2.5}$ during the most intense construction period. For PM_{10}, the proximity relevant for cumulative impacts would be, at most, a few hundred yards. Watering of active grading areas at least three times per day is a design feature of the project. Of the 90 potentially cumulative projects, two are within approximately 2,000 feet of the project areas where onsite fugitive dust would be generated. The closest project would be the

Spirit of Joy Lutheran Church, which would be located approximately 500 feet east of Cumming Ranch Lot 11, identified as project #10 in the cumulative project list. An application has been filed with the County for the church project; however, the specific timing of construction is not known. If the church property (approximately 5 acres) were to be graded during the same time as the heaviest grading period anticipated for Cumming Ranch, it is conservatively estimated that a combined maximum of 1.5 acres per day would be graded, and maximum emissions would be 17 pounds per day of PM_{10} and 5 pounds per day of $PM_{2.5}$, resulting in a cumulative total of 89 pounds per day of PM_{10} and 27 pounds per day of $PM_{2.5}$. This cumulative total is less than the screening level thresholds. The RMWD SMWWTP Expansion Project, #89 in the cumulative project list, would be approximately 1,700 feet from areas of active grading for residential development. The timing of this project is phased, and portions would likely occur prior to construction of Cumming Ranch. The expansion would occur at the existing SMWWTP site, and significant land modification and grading would not be expected, minimizing the amount of fugitive dust generated. The Supplemental EIR for the project found no direct or cumulative air quality impacts. In consideration of these projects added to the proposed Cumming Ranch project, it is concluded that the cumulative emissions would not exceed Guideline 3 or 4, and the impact would be ***less than significant***.

Conformity with the San Diego Regional Air Quality Strategy

Consistency with the SDAPCD RAQS is determined by two standards. The first standard is if the project would increase the frequency or severity of existing air quality violations, contribute to new violations, or delay the timely attainment of air quality standards or interim reductions as specified in the RAQS. The second standard is whether the project would exceed assumptions contained in the RAQS.

Based on the air quality emissions modeling contained in this report, the proposed project would cause less-than-significant short-term construction impacts and less-than-significant long-term operational impacts on air quality. Thus, the project would not increase the frequency or the severity of air quality violations, contribute to new violations, or delay the timely attainment of air quality standards or interim reductions as specified in the RAQS.

Consistency with the RAQS assumption is determined by analyzing the project with the assumptions in the RAQS. Thus, the emphasis of this criterion is to ensure that the analyses for the project are based on the similar forecasts as the RAQS. Forecasts used in the RAQS are developed by SANDAG. SANDAG forecasts are based on local general plans and other related documents that are used to develop population projections and traffic projections. The former General Plan used in development of the RAQS assumed development of the project site with

166 homes. Because the project only includes 125 homes, the project would result in less population growth and fewer vehicle trips than currently planned. Thus, the proposed project would not exceed the assumptions used to develop the RAQS, and would not obstruct or conflict with the SDAPCD's RAQS.

For these reasons, the project would conform to the RAQS and per Guidelines 1 and 4, and the cumulative impact would be ***less than significant***.

4.1.8.5 Conclusions

Implementation of the proposed project would result in less-than-significant impacts related to air criteria pollutants because emissions would be below the appropriate thresholds. Potential odor impacts would be controlled with the use of technology designed to contain and control the potential smell from the lift station, and would be less than significant per Guideline 7.

4.2 Effects Found Not Significant during Initial Study

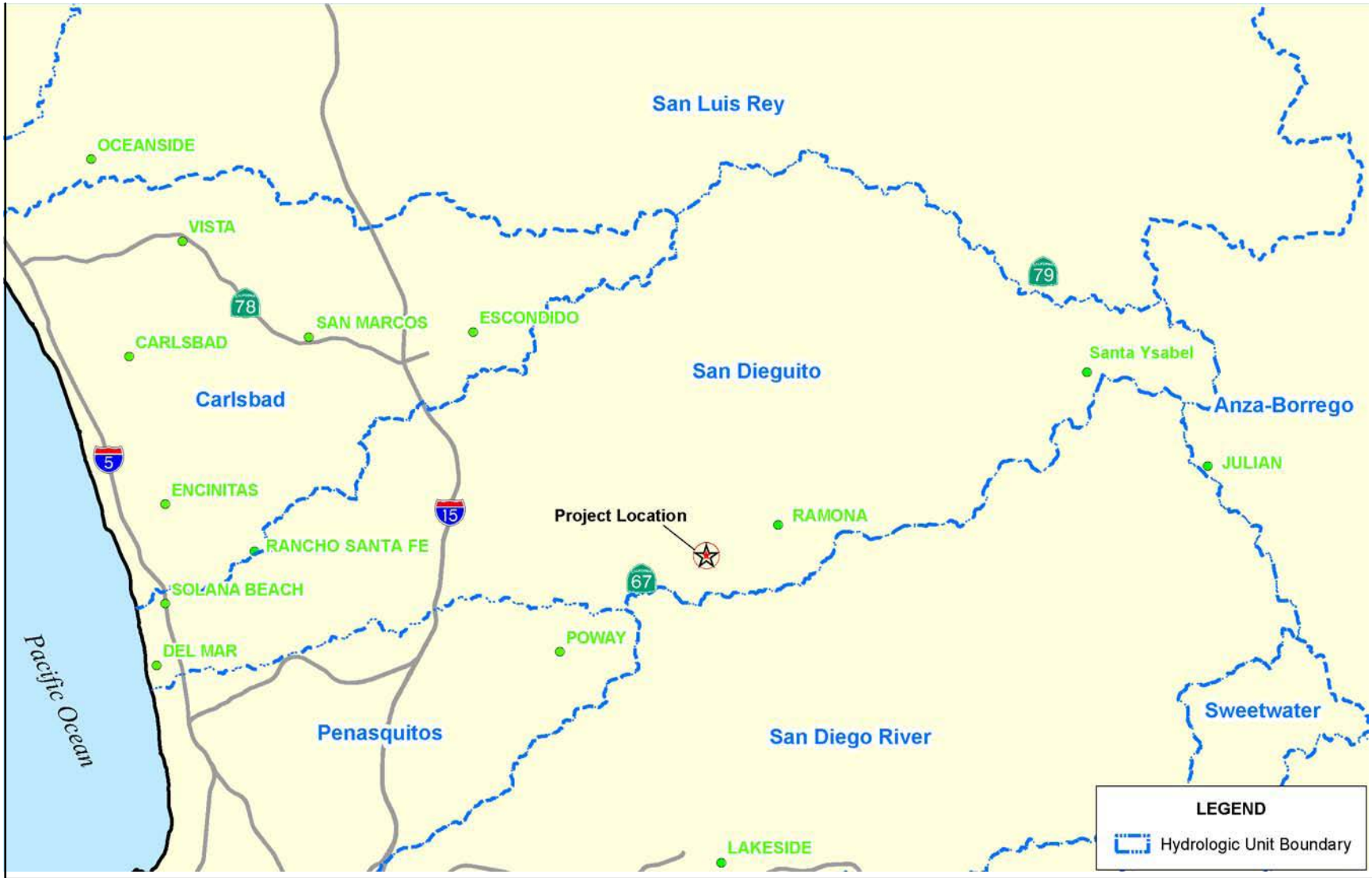
An Initial Study was prepared by the County in December of 2003 and is included as Appendix N. The Initial Study discusses whether significant environmental impacts are anticipated for each resource area. The Initial Study found that the proposed project would have a less-than-significant impact on paleontological resources and depletion of groundwater, as summarized below.

4.2.1 Paleontological Resources

The proposed project was found to have a less-than-significant impact on paleontological resources based on a review of paleontological maps provided by the San Diego Museum of Natural History. These maps indicated that the proposed project site is not located on geological formations that contain significant paleontological resources. The geologic formations that underlie the project site have a low probability of containing paleontological resources.

4.2.2 Groundwater Depletion

The Initial Study concluded that the proposed project would not deplete groundwater resources because it would receive water from the RMWD, which obtains its water supply from surface reservoirs and/or imported sources. The project does not propose to use groundwater for irrigation or domestic supply, and no groundwater wells are proposed.



Source: SANDAG

NORTH

30,000 15,000 0 30,000 Feet

Scale: 1:360,242; 1 inch = 30,020 feet

Figure 4-1
San Dieguito Hydrological Unit

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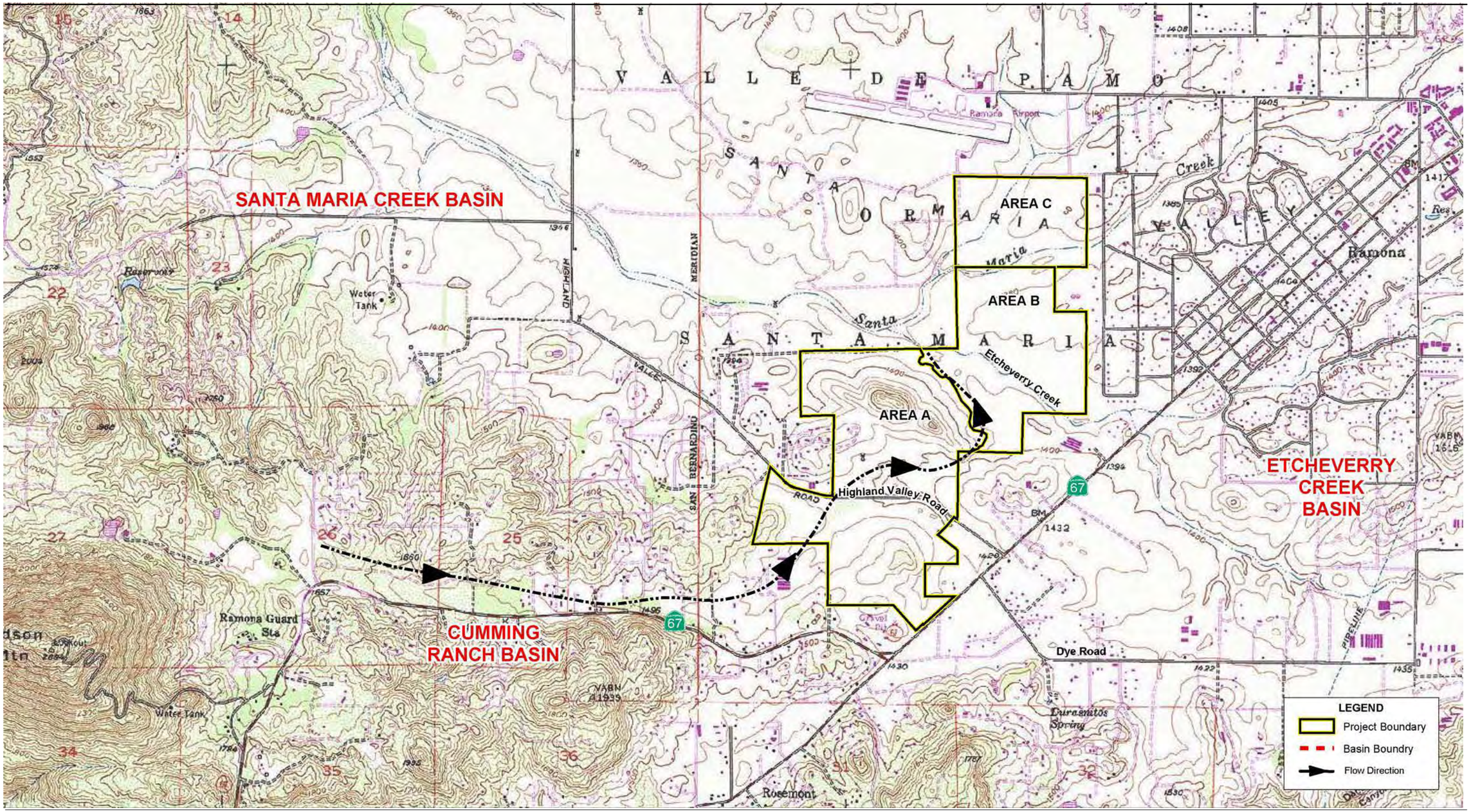

Source: USGS, San Vicente Reservoir and San Pasqual Quad, Snipes-Dye Associates, December 2004

2000 1000 0 2000 Feet

Scale: 1:24,000; 1 inch = 2,000 feet

Figure 4-2
Project Drainage Basins

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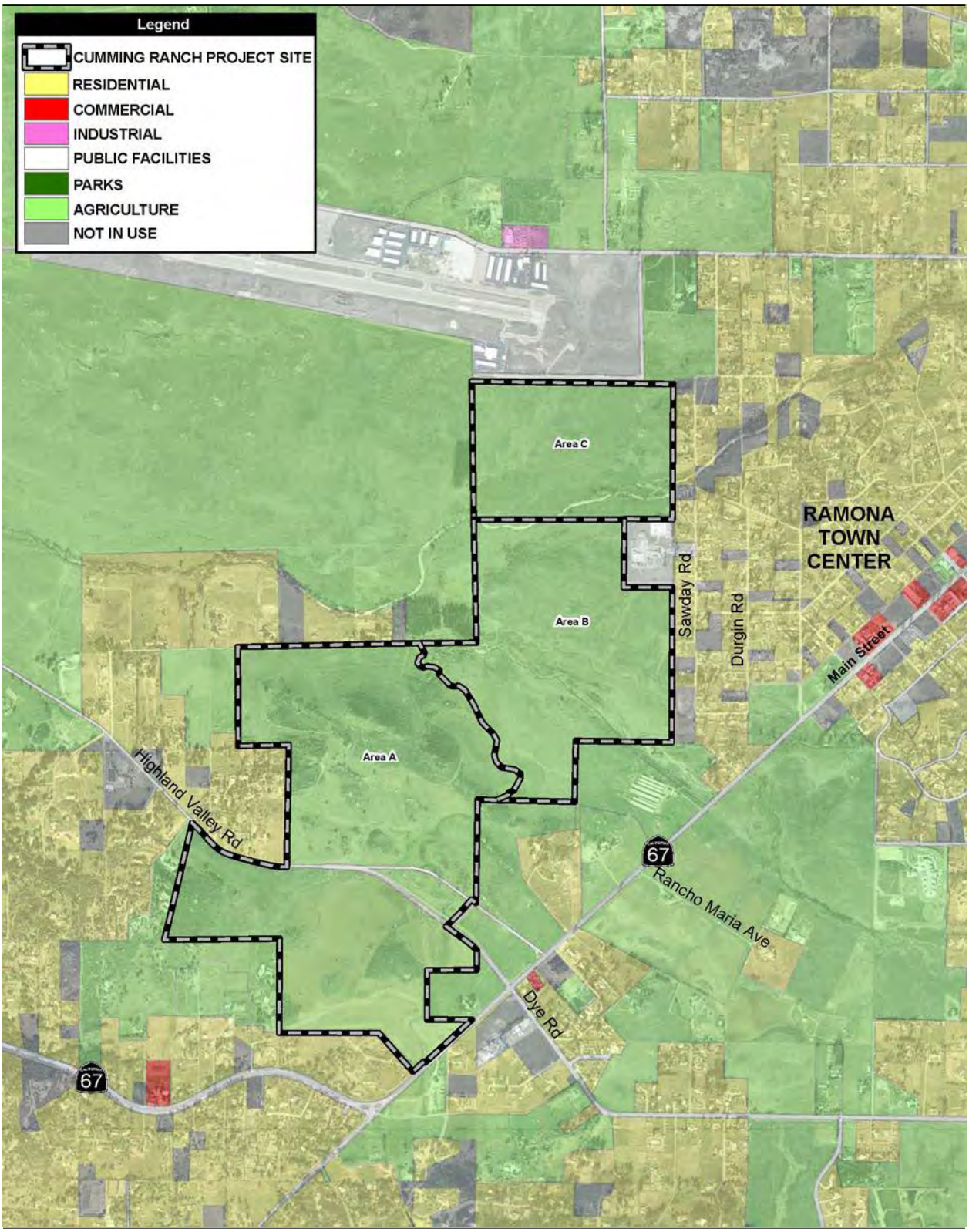
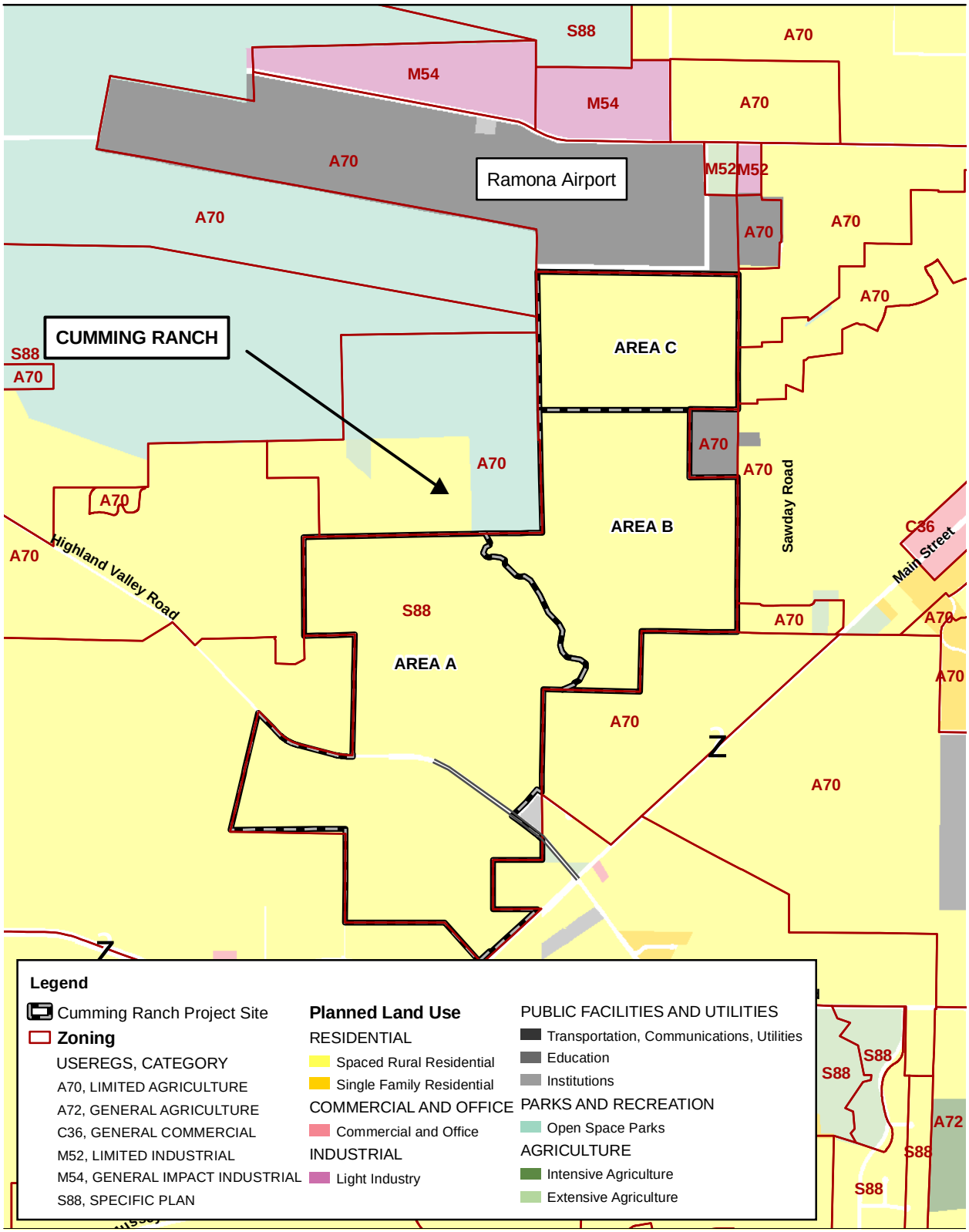


Source: AirPhotoUSA 2006; SANDAG 2003

Figure 4-3
Generalized Land Uses



Source: SanGIS 2010; SANDAG 2009

NORTH

2000 1000 0 2000 Feet

Scale: 1 = 24,000; 1 inch = 2,000 feet

Figure 4-4
Land Use Designations and Zoning

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Table 4-1
Beneficial Uses of Cumming Ranch Receiving Waters

	Hydrologic Unit Basin Number	Beneficial Uses *																						
		MUN	AGR	PROC	IND	GWR	FRSH	NAV	POW	REC-1	REC-2	COMM	AQUA	WARM	COLD	SAL	EST	MAR	WILD	BIOL	RARE	MIGR	SPWN	SHELL
Inland Surface Waters																								
San Dieguito River Watershed	N/A																							
Etcheverry Creek[1] (southern tributary to Santa Maria Creek)	5.41	●	●	●	●					●	●			●					●					
Santa Maria Creek	5.41	●	●	●	●					●	●			●					●					
Santa Ysabel Creek	5.32	●	●	●	●					○	●			●					●		●			
Lake Hodges	5.21	●	●	●	●					●[2]	●			●	●				●		●			
San Dieguito River	5.11	+	○		○					●	●			●					●					
Coastal Waters																								
Pacific Ocean	N/A				●			●		●	●	●	●					●	●	●	●	●	●	●
San Dieguito Lagoon	5.11									●	●						●	●	●	●	●	●		
Groundwater																								
San Dieguito Hydrologic Unit	5.00																							
Santa Maria Valley Hydrologic Area	5.40																							
Ramona Hydrologic Subarea	5.41	●	●	●	●																			

Source: California Regional Water Quality Control Board, San Diego Region, 1994. Water Quality Control Plan for the San Diego Basin (9).

● Existing Beneficial Use
○ Potential Beneficial Use
\+ Excepted from MUN
N/A Not Applicable
* See Table 4-2, below, for definitions of the beneficial uses.
[1] Beneficial use designations apply to all tributaries to the indicated water body, if not listed separately.
[2] Fishing from shore or boat permitted, but other water contact recreational (REC-1) uses are prohibited.

Table 4-2
Applicable Beneficial Use Designations

Beneficial Use	Abbreviation	Definition
Municipal and Domestic Supply	MUN	Community, military, or individual water supply systems, including drinking water supply.
Agricultural Supply	AGR	Farming, horticulture, or ranching, including irrigation, stock watering, or support of vegetation for range grazing.
Industrial Process Supply	PROC	Industrial activities that depend primarily on water quality.
Industrial Service Supply	IND	Industrial activities that do not depend primarily on water quality, including mining, cooling water supply, hydraulic conveyance, gravel washing, fire protection, and oil well repressurization.
Ground Water Recharge	GWR	Natural or artificial recharge of groundwater for purposes of future extraction, maintenance of water quality, or halting of saltwater intrusion into freshwater aquifers.
Freshwater Replenishment	FRSH	Natural or artificial maintenance of surface water quantity or quality (e.g., salinity).
Navigation	NAV	Shipping, travel, or other transportation by private, military, or commercial vessels.
Hydropower Generation	POW	Hydropower generation.
Contact Water Recreation	REC-1	Recreational activities involving body contact with water, where ingestion of water is reasonably possible. These uses include swimming, wading, water-skiing, skin and SCUBA diving, surfing, white water activities, fishing, or use of natural hot springs.
Non-Contact Water Recreation	REC-2	Recreational activities involving proximity to water, but not normally involving body contact with water, where ingestion of water is reasonably possible. These uses include picnicking, sunbathing, hiking, beachcombing, camping, boating, tidepool and marine life study, hunting, sightseeing, or aesthetic enjoyment in conjunction with the above activities.
Commercial and Sport Fishing	COMM	Commercial or recreational collection of fish, shellfish, or other organisms, including uses involving organisms intended for human consumption or bait purposes.
Aquaculture	AQUA	Aquaculture or mariculture operations, including propagation, cultivation, maintenance, or harvesting of aquatic plants and animals for human consumption or bait purposes.
Warm Freshwater Habitat	WARM	Warm water ecosystems, including preservation or enhancement of aquatic habitats, vegetation, fish, or wildlife, including invertebrates.
Cold Freshwater Habitat	COLD	Cold water ecosystems, including preservation or enhancement of aquatic habitats, vegetation, fish, or wildlife, including invertebrates.
Inland Saline Water Habitat	SAL	Inland saline water ecosystems, including preservation or enhancement of aquatic saline habitats, vegetation, fish, or wildlife, including invertebrates.
Estuarine Habitat	EST	Estuarine ecosystems, including preservation or enhancement of estuarine habitats, vegetation, fish, shellfish, or wildlife (e.g., estuarine mammals, waterfowl, shorebirds).

Table 4-2. Continued

Beneficial Use	Abbreviation	Definition
Marine Habitat	MAR	Marine ecosystems, including preservation or enhancement of marine habitats, vegetation such as kelp, fish, shellfish, or wildlife (e.g., marine mammals, shorebirds).
Wildlife Habitat	WILD	Terrestrial ecosystems, including preservation and enhancement of terrestrial habitats, vegetation, wildlife (e.g., mammals, birds, reptiles, amphibians, invertebrates), or wildlife water and food resources.
Preservation of Biological Habitats of Special Significance	BIOL	Designated areas or habitats such as established refuges, parks, sanctuaries, ecological reserves, or Areas of Special Biological Significance, where the preservation or enhancement of natural resources requires special protection.
Rare, Threatened, or Endangered Species	RARE	Habitats necessary, at least in part, for the survival and successful maintenance of plant and animal species established under state or federal law as rare, threatened, or endangered.
Migration of Aquatic Organisms	MIGR	Habitats necessary for migration, acclimatization between fresh and salt water, or other temporary activities by aquatic organisms, such as anadromous fish.
Spawning, Repro-duction, and/or Early Development	SPWN	High-quality habitats suitable for reproduction and early development of fish. This use is applicable only for the protection of anadromous fish.
Shellfish Harvesting	SHELL	Habitats suitable for the collection of filter-feeding shellfish (e.g., clams, oysters, and mussels) for human consumption, commercial, or sport purposes.

Source: California Regional Water Quality Control Board, San Diego Region, 1994. Water Quality Control Plan for the San Diego Basin (9).

Table 4-3
General Categories of Water Pollution

Category	Definition and Associated Impacts
Sediments	Sediments are soils or other surficial materials eroded and then transported or deposited by the action of wind, water, ice, or gravity. Sediments can increase turbidity, clog fish gills, reduce spawning habitat, lower young aquatic organism survival rates, smother bottom dwelling organisms, and suppress aquatic vegetation growth.
Nutrients	Nutrients are inorganic substances, such as nitrogen and phosphorus. They commonly exist in the form of mineral salts that are either dissolved or suspended in water. Primary sources of nutrients in urban runoff are fertilizers and eroded soils. Excessive discharge of nutrients to water bodies and streams can cause overabundant aquatic algae and plant growth. Such excessive production, referred to as cultural eutrophication, may lead to extreme decay of organic matter in the water body, loss of oxygen in the water, release of toxins in sediment, and the eventual death of aquatic organisms.
Trash and Debris	Trash (such as paper, plastic, polystyrene packing foam, and aluminum materials) and biodegradable organic matter (such as leaves, grass cuttings, and food waste) are general waste products on the landscape. The presence of trash and debris may have a significant impact on the recreational value of a water body and aquatic habitat. Excess organic matter can create a high biochemical oxygen demand in a stream and thereby lower its water quality. Also, in areas where stagnant water exists, the presence of excess organic matter can promote septic conditions resulting in the growth of undesirable organisms and the release of odorous and hazardous compounds such as hydrogen sulfide.
Oxygen Demanding Substances	This category includes biodegradable organic material and chemicals that react with dissolved oxygen in water to form other compounds. Proteins, carbohydrates, and fats are examples of biodegradable organic compounds. Compounds such as ammonia and hydrogen sulfide are examples of oxygen demanding compounds. The oxygen demand of a substance can lead to depletion of dissolved oxygen in a water body and possibly the development of septic conditions.
Oil and Grease	Oil and grease are characterized as high molecular weight organic compounds. Primary sources of oil and grease are petroleum hydrocarbon products, motor products from leaking vehicles, esters, oils, fats, waxes, and high molecular-weight fatty acids. Introduction of these pollutants to the water bodies is very possible due to the wide uses and applications of some of these products in municipal, residential, commercial, industrial, and construction areas. Elevated oil and grease content can decrease the aesthetic value of the water body, as well as the water quality.
Bacteria and Viruses	Bacteria and viruses are ubiquitous microorganisms that thrive under certain environmental conditions. Their proliferation is typically caused by the transport of animal or human fecal wastes from the watershed. Water containing excessive bacteria and viruses can alter the aquatic habitat and create a harmful environment for humans and aquatic life. Also, the decomposition of excess organic waste causes increased growth of undesirable organisms in the water.
Pesticides	Pesticides (including herbicides) are chemical compounds commonly used to control nuisance growth or prevalence of organisms. Excessive application of a pesticide may result in runoff containing toxic levels of its active component.

Table 4-4
Fire Stations Serving the Project Area

Fire Station No.	Address	Approximate Distance from Project Site
80	829 South San Vicente Road, Ramona, CA 92065	2.5 miles
81	24462 San Vicente Road, Ramona, CA 92065	9.0 miles
82	3410 Dye Road, Ramona, CA 92065	0.5 mile

Source: Scott Franklin Consulting 2010

Table 4-5
Fire Spread Models

Fuel Model No. and Description	Summer Fire			Fall/Winter Fire		
	Rate of Spread (mph)	Flame Length (feet)	Spotting Distance (miles)	Rate of Spread (mph)	Flame Length (feet)	Spotting Distance (miles)
Fuel Model 1 – low load, representing nonnative grassland	4.0	9.7	0.4	8.3	12.7	1.1
Gr4 – moderate load, representing oat-hay	1.8	13	0.6	12.4	32.4	2.2
Sh5– high load, representing Diegan coastal sage scrub and southern mixed chaparral	2.5	27.0	0.9	10.7	53.6	3.1

Source: Scott Franklin Consulting 2010

Table 4-6
Agricultural Activities on the Cumming Ranch Property

Farming Activity	Time Period	Description of Activity
Land Preparation and Crop Planting	November – January	During these months, the land is prepared for planting of dry oat-hay. The preparation activities include tilling and discing of the soil. Once the soil is prepared, the crop is then seeded.
Growing Season	February – April	During these months, the oat-hay crop is growing and maturing.
Harvest	May – June	Throughout these 2 months, the oat-hay crop is typically ready for harvest. Harvesting activities include mowing, raking, and baling the hay.
Grazing	August – October	During the early fall months while the land is fallow, cattle are allowed to graze.

Source: Dempsey 2009

Table 4-7
Crop Production History

Year	Weather Conditions	Crop Production
2002	Drought	No tonnage produced, crop grazed off
2003	Average	300 tons of good-quality hay
2004	Drought	No tonnage produced, crop grazed off
2005	Unseasonably wet	75 tons of poor-quality hay
2006	Low rainfall in beginning of season	75 tons
2007	Drought	100 tons of poor-quality hay
2008	Drought	100 tons of poor-quality hay

Source: Dempsey 2009

Table 4-8
Ramona Community Plan Relevant Agricultural Policies

Agricultural Land Use Policy	Consistent?	Discussion
Policy 1. The County will promote and preserve viable agriculture land uses within the Ramona Planning Area.	Yes	Although portions of the project site are currently in agricultural use, the viability of the project site has decreased over the last decade due to surrounding development. Area B would not be developed with urban uses that would preclude the continued agricultural use of that area. In addition, agriculture uses, such as animal keeping, would be allowed on residential lots in accordance with County policy.
Policy 4. Review the agricultural use and/or agricultural potential of land prior to consideration of residential development proposals.	Yes	An Agricultural Analysis Report was required by the County to specifically analyze the potential impact to farmland and agriculture with implementation of the proposed project.
Policy 5. Encourage the protection of areas designated for agricultural activities from scatter and incompatible urban intrusions.	Yes	The project site is not designated for agricultural activities. In addition, the project site is generally surrounded with development and is adjacent to the Ramona Town Center boundary.
Residential Land Use Policy	**Consistent?**	**Discussion**
Policy 2. The majority of residential lots in the planning area shall be of a size sufficient to accommodate the keeping of large animals.	Yes	The average sized lot in the proposed project is approximately 1.5 acres, with some lots ranging up to approximately 3.1 acres. The proposed project would allow for animal keeping in accordance with County policy.
Policy 3. Maintain the existing rural lifestyle by continuing the existing pattern of residential and agricultural uses on large lots outside of the Town Center and San Diego County Estates.	Yes	The project is located directly adjacent to the Ramona Town Center boundary and proposes residential development, similar to what is planned in the Ramona Community Plan for this SPA. The residential development would allow for small agricultural practices in accordance with County policies.

Source: County of San Diego 2002b

Table 4-9
Soils on Area A of the Cumming Ranch Site

Soil Name and Description	Map Symbol	Slope Percentage	Depth to Bedrock (inches)	Erosion Hazard	Shrink-Swell Behavior	Homesite Development Limitation
Bonsall-Fallbrook sandy loam Moderately deep to deep, moderately well drained soils that have a very slowly permeable subsoil.	BnB	2 to 5	18 to 44	Slight	High	Moderate
Cieneba very rocky coarse sandy loam Excessively drained, very shallow to shallow coarse sandy loams on uplands.	CmrG	30 to 75	3 to 17	Moderate to very high	Low	Severe
Fallbrook sandy loam Well-drained, moderately deep/deep soil formed in place by weathering from granodiorite.	FaB	2 to 5	32 to 60	Slight	Moderate	Slight
Fallbrook sandy loam Well drained soils, moderately deep to deep sandy loam on upland areas.	FaC	5 to 9	32 to 62	Slight to moderate	Moderate	Slight
Fallbrook sandy loam Well-drained, moderately deep/deep soil formed in place by weathering from granodiorite.	FaD2	9 to 15	26 to 60+	Moderate	Moderate	Moderate
Fallbrook rocky sandy loam Well-drained, moderately deep/deep soil formed in place by weathering from granodiorite.	FeC	5 to 9	10 to 40	Slight to high	Moderate	Slight
Fallbrook rocky sandy loam Well-drained, moderately deep/deep soil formed in place by weathering from granodiorite.	FeE	9 to 30	10 to 40	Moderate to high	Low	Moderate
Placentia sandy loam Moderately well drained soil that has a sandy clay subsoil.	PeC	2 to 9	40	Moderate	High	Moderate
Ramona sandy loam Well-drained, very deep soil formed in granitic alluvium.	RaB	2 to 5	60+	Slight to moderate	Moderate	Slight
Visalia sandy loam Moderately well drained, very deep soil formed in granitic alluvium.	VaA	0 to 2	60	Slight	Low	Moderate
Vista rocky coarse sandy loam Well-drained moderately deep soil derived from granodiorite or quartz diorite.	VvD	5 to 15	20 to 36	Slight to moderate	Low	Slight

Source: USDA 1973

Table 4-10
National and California Ambient Air Quality Standards

Pollutant	Averaging Time	NAAQS[1]		CAAQS[2]
		Primary[3]	Secondary[4]	Concentration[5]
Ozone (O_3)[6]	1-Hour	-	Same as Primary Standard	0.09 ppm (180 µg/m^3)
	8-Hour	0.08 ppm (157 µg/m^3)		0.070 ppm (137 µg/m^3)[9]
Carbon Monoxide (CO)	8-Hour	9.0 ppm (10 mg/m^3)	None	9.0 ppm (10 mg/m^3)
	1-Hour	35 ppm (40 mg/m^3)		20 ppm (23 mg/m^3)
Nitrogen Dioxide (NO_2)	Annual Average	0.053 ppm (100 µg/m^3)	Same as Primary Standard	0.030 ppm (56 µg/m^3)[10]
	1-Hour	-		0.18 ppm (338 µg/m^3)[10]
Sulfur Dioxide (SO_2)	Annual Average	0.03 ppm (80 µg/m^3)	-	-
	24-Hour	0.14 ppm (365 µg/m^3)	-	0.04 ppm (105 µg/m^3)
	3-Hour	-	0.5 ppm (1300 µg/m^3)	-
	1-Hour	-	-	0.25 ppm (655 µg/m^3)
Suspended Particulate Matter (PM_{10})[7]	24-Hour	150 µg/m^3	Same as Primary Standard	50 µg/m^3
	Annual Arithmetic Mean	Revoked		20 µg/m^3 [note 7]
Fine Particulate Matter ($PM_{2.5}$)[8]	24-Hour	35 µg/m^3	Same as Primary Standard	-
	Annual Arithmetic Mean	15 µg/m^3		12 µg/m^3
Lead (Pb)	30-Day Average	-	-	1.5 µg/m^3
	Calendar Quarter	1.5 µg/m^3	Same as Primary Standard	-
Hydrogen Sulfide (H_2S)	1-Hour	No Federal Standards		0.03 ppm (42 µg/m^3)
Sulfates (SO_4)	24-Hour			25 µg/m^3
Visibility Reducing Particles	8-Hour (10 am to 6 pm, Pacific Standard Time)			In sufficient amount to produce an extinction coefficient of 0.23 per km due to particles when the relative humidity is less than 70%.
Vinyl chloride[9]	24-Hour			0.01 ppm (26 µg/m^3)

[1] NAAQS (other than O_3, particulate matter, and those based on annual averages or annual arithmetic mean) are not to be exceeded more than once a year. The O_3 standard is attained when the fourth highest 8-hour concentration in a year, averaged over 3 years, is equal to or less than the standard. For PM_{10}, the 24-hour standard is attained when 99% of the daily concentrations, averaged over 3 years, are equal to or less than the standard. For $PM_{2.5}$, the 24-hour standard is attained when 98% of the daily concentrations, averaged over 3 years, are equal to or less than the standard. Contact USEPA for further clarification and current federal policies.

[2] California Ambient Air Quality Standards for O_3, CO (except Lake Tahoe), SO_2 (1- and 24-hour), NO_2, PM_{10}, and visibility reducing particles, are values that are not to be exceeded. All others are not to be equaled or exceeded.

[3] National Primary Standards: The levels of air quality necessary, with an adequate margin of safety, to protect the public health.

[4] National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.

[5] Concentration expressed first in units in which it was promulgated. Ppm in this table refers to ppm by volume or micromoles of pollutant per mole of gas.

[6] On June 15, 2005, the 1-hour ozone standard was revoked for all areas except the 8-hour ozone nonattainment Early Action Compact Areas (those areas do not yet have an effective date for their 8-hour designations). Additional information on federal ozone standards is available at http://www.epa.gov/oar/oaqps/greenbk/index.html.

[7] Due to a lack of evidence linking health problems to long-term exposure to coarse particle pollution, USEPA revoked the annual PM_{10} standard on December 17, 2006.

[8] Effective December 17, 2006, USEPA lowered the $PM_{2.5}$ 24-hour standard from 65 µg/m^3 to 35 µg/m^3.

[9] CARB has identified lead and vinyl chloride as "toxic air contaminants" with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.

[10] The Nitrogen Dioxide ambient air quality standard was amended on February 22, 2007, to lower the 1-hr standard to 0.18 ppm and establish a new annual standard of 0.030 ppm. These changes become effective after regulatory changes are submitted and approved by the Office of Administrative Law.

ppm = parts per million; µg/m^3 = micrograms per cubic meter; mg/m^3 = milligrams per cubic meter; km = kilometers
Source: CARB 2007

Table 4-11
Estimated Emissions (Pounds/Day)

Time Period[1] and Activity	VOC	NO_X	CO	SO_X	PM_{10}	$PM_{2.5}$
2008 – October through December						
New Road Construction[2,3]	15	88	94	-	34	10
Highland Valley Road Widening[2,3]	8	42	43	-	5	2
Utilities Construction	2	20	10	0	1	1
Total	**25**	**150**	**147**	**0**	**40**	**13**
Thresholds of Significance (Pounds/Day)	*75*	*250*	*550*	*250*	*100*	*55*
Does the Project Exceed Thresholds?	**No**	**No**	**No**	**No**	**No**	**No**
2009 – April through June						
New Road Construction[2,3]	15	88	94	-	34	10
Highland Valley Road Widening[2,3]	8	42	43	-	5	2
Utilities Construction	2	19	8	0	1	1
Grading – South Areas[3]	4	36	20	0	30	8
Building Construction – South Areas	5	23	35	0	2	1
Total	**35**	**208**	**201**	**0**	**72**	**22**
Thresholds of Significance (Pounds/Day)	*75*	*250*	*550*	*250*	*100*	*55*
Does the Project Exceed Thresholds?	**No**	**No**	**No**	**No**	**No**	**No**
2010 – October through December						
Grading – North Areas[3]	3	25	13	0	23	6
Building Construction – South Areas	5	22	33	0	2	1
Architectural Coating – South Areas	2	0	0	0	0	0
Area Sources – 71 Occupied Homes[4]	15	2	31	0	5	5
Vehicle Operations – 71 Occupied Homes[4]	9	15	93	0	15	3
Total	**34**	**64**	**171**	**0**	**44**	**15**
Thresholds of Significance (Pounds/Day)	*75*	*250*	*550*	*250*	*100*	*55*
Does the Project Exceed Thresholds?	**No**	**No**	**No**	**No**	**No**	**No**
2012 – January through March						
Building Construction – North Areas	4	19	29	0	1	1
Architectural Coating – North Areas	2	0	0	0	0	0
Area Sources – 125 Occupied Homes[4]	27	4	55	0	8	8
Vehicle Operations – 125 Occupied Homes[4]	13	22	141	0	26	5
Total	**46**	**45**	**225**	**0**	**35**	**15**
Thresholds of Significance (Pounds/Day)	*75*	*250*	*550*	*250*	*100*	*55*
Does the Project Exceed Thresholds?	**No**	**No**	**No**	**No**	**No**	**No**

Emissions rounded to the nearest pound; totals may not add due to rounding.

See Appendix A for road construction calculations and Appendices B and C for all other calculations.

[1] Time periods not shown in this table have less emissions; all time periods are shown in Appendices B and C. Time periods shown are outdated since completion of the air quality modeling; however, these calculations are considered to be conservative, as better technology continues to reduce emissions output from construction equipment.

[2] Road construction model does not calculate SO_X or $PM_{2.5}$. SO_X emissions are negligible; $PM_{2.5}$ emissions manually calculated from PM_{10} data.

[3] Road construction and grading operations include watering three times per day to suppress fugitive dust, which is a project design feature.

[4] Area and vehicle operations based on winter conditions with fireplace use; summer emissions would be less.

Table 4-12
Estimated Maximum CO Concentrations – Existing-Plus-Project

Intersection	Existing		Existing + Project		Change	
	AM	**PM**	**AM**	**PM**	**AM**	**PM**
1-Hour Concentrations						
SR 67/Highland Valley Road	9.3	9.7	9.4	9.8	0.1	0.1
8-Hour Concentrations						
SR 67/Highland Valley Road	5.6	5.8	5.6	5.9	0	0.1

Table 4-13
Estimated Maximum CO Concentrations – Cumulative Conditions

Intersection	Existing		Cumulative		Change	
	AM	**PM**	**AM**	**PM**	**AM**	**PM**
1-Hour Concentrations						
SR 67/Highland Valley Road	9.3	9.7	8.7	9.4	-0.6	-0.3
8-Hour Concentrations						
SR 67/Highland Valley Road	5.6	5.8	5.2	5.6	-0.4	-0.2

Note: Due to anticipated improvements in vehicle fuel efficiency and fuel formulation, while the number of vehicles would increase, the overall emissions from vehicles would decrease over time.

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CHAPTER 5.0
PROJECT ALTERNATIVES

5.1 Rationale for Alternative Selection

The Cumming Ranch project, as proposed by the project applicant, has been described and analyzed in the previous chapters with an emphasis on potentially significant impacts and recommended mitigation measures to avoid these impacts. The environmental analysis in this EIR found that the proposed project could result in potential direct project impacts to issues including traffic, public services, noise, biology, cultural resources, visual resources, and global climate change. These impacts can be mitigated to below a level of significance with the incorporation of the mitigation measures in Chapter 3 of this EIR.

The CEQA Guidelines direct lead agencies that the "range of potential alternatives to the proposed project shall include those that could feasibly accomplish most of the basic objectives of the project and could avoid or substantially lessen one or more of the significant effects" (Section 15126.6[c]). This chapter provides a comparative analysis of four project alternatives that could lessen or avoid significant impacts that were identified in Chapters 2 and 3. Four project alternatives, including two "no project" alternatives, one reduced density alternative, and one clustered development alternative, are analyzed and discussed below. Several other project alternatives were considered but rejected from further evaluation; these rejected alternatives are discussed in Section 5.1.1, below. The alternative analysis evaluates each issue area in comparison to the proposed project.

The following discussion is intended to inform the public and decision-makers of some of the project alternatives that could be developed and the positive and negative aspects of those alternatives as compared to the proposed project. This chapter also includes analysis of the No Project Alternative, as required by CEQA.

It is noted that some of the project objectives are met by designating specific lands (Areas B and C) as open space for the purpose of contributing to the Ramona Grasslands Preserve. Therefore, development of alternatives is focused on the southern portion of the property (Area A). Another of the project objectives, to minimize impacts to natural drainage areas, major rock outcroppings, ridgelines, and major stands of oak trees, also limits feasible alternatives to those that incorporate open space for their protection in Area A. Therefore, the number of alternatives is fairly narrow due to the project's environmental design considerations.

5.1.1 Alternatives Considered but Rejected

This section outlines alternatives that were considered during the evaluation process but were rejected. In accordance with CEQA Guidelines (Section 15126.6[c]), factors that may be used to eliminate alternatives from detailed consideration in an EIR include (1) failure of the alternative to meet most of the basic project objectives, (2) infeasibility of the alternative, or (3) inability of the alternative to avoid significant environmental impacts. The five project objectives are stated in Subchapter 1.2 of this EIR. Factors that may be taken into account when considering the feasibility of project alternatives include site suitability; economic viability; availability of infrastructure; consistency with general plans or other plans or regulatory limitations; and whether the proponent can reasonably acquire, control, or otherwise have access to the alternative site (CEQA Guidelines 15126.6[f][1]).

Offsite Alternatives

Per Section 15126.6(f)(2) of the CEQA Guidelines, the key question to ask when considering if an alternative location should be analyzed in an EIR is whether any of the significant effects of the proposed project would be avoided or substantially lessened by placing the project in another location. Potential alternative locations with more than 400 acres of undeveloped land in the Ramona area were considered suitable in this analysis, because that is the approximate size of the development area of the project site.

Many of the remaining large parcels of undeveloped land in the Ramona area were designated as SPAs for residential development in the former Ramona Community Plan. These SPAs were defined by the former Ramona Community Plan as being the most ideal locations for larger-sized residential developments to provide for expected growth in an organized manner. Many of the SPA areas are currently planned for development, such as the Oak County Partnership SPA and the Montecito Ranch SPA (see the list of cumulative projects in Table 1-5), or development has already begun, such as the Woodson Ranch SPA and Rancho San Vicente SPA. Outside of these planned SPAs, there is a limited amount of appropriate space available for a project the size of the Cumming Ranch project.

The most potentially feasible areas for alternative locations for the proposed project include the lands northwest of the project site. There are large undeveloped parcels in this area that may provide for potential purchase of enough parcels to total 400 acres. However, these areas are not considered feasible for development of the project because they are located in the middle of the lands delineated by the County for the formation of the Ramona Grasslands Preserve. In addition, access to these areas is more difficult because of their distance from SR 67. It is also

expected that development of a project in this area, comparable to the one proposed, would result in equivalent environmental impacts, because the land is generally undeveloped nonnative grasslands and is expected to have similar environmental characteristics. Because the environmental characteristics of an alternative site in this general area would be similar to those found on the project site, environmental impacts would not be avoided by development of the project in another location. In addition, many of these areas have not been specifically designated for residential development in the Ramona Community Plan. The increased distance from the Ramona Town Center and other more densely developed areas would create potential land use issues and may not meet the desired goals of the Ramona Community Plan to maintain rural character while allowing for organized growth. The proposed project's contiguous location to the Ramona Town Center and the RMWD facilities for water and sewer service are important factors that make the project site desirable over other locations.

CEQA Guideline 15126.6(f)(1) states that factors that must be taken into account when considering feasibility of alternatives include "whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or that site is already owned by the proponent)." Other lands throughout the Ramona area would be difficult to develop with the requirement of a 400-acre project site because many parcels are smaller in size and have multiple owners. This would make the process of acquiring enough contiguous pieces of land to create a project site of the required size complicated and financially difficult. The entire project site is currently owned by the project proponent.

Considering that the environmental impacts of developing in areas to the northwest of the project site or other undeveloped portions of Ramona would generally be equal to those of the proposed project site, and acquisition of land elsewhere in Ramona of sufficient size is potentially infeasible, alternative locations were not considered further for this EIR.

Davis Ranch

The parcel of land known as the Davis Ranch was considered as an alternative location for development of the project. The 1,231-acre Davis Ranch SPA is located to the north of the proposed project site and is similar in character and allowable use to the Cumming Ranch property. A portion of the site was purchased by RMWD for continued use as spray fields and a portion of the site was purchased by TNC for inclusion in the Ramona Grasslands Preserve. Because this property is no longer available, it was not further considered as an alternative to the project.

Development in Area B

It was considered whether an alternative that would place all residential development within Area B would be appropriate for analysis. This alternative would be considered feasible because the property is already owned by the project proponent, the land is suitable for development, and it is possible that some biological impacts could be avoided if development occurred only within this area. However, this alternative was rejected from further consideration based on the importance of that particular area of the site as a wildlife corridor for movement throughout the grasslands and along the creeks. Development on this parcel would defeat the goals of the project to integrate and accommodate the Ramona Grasslands Preserve.

5.1.2 Alternatives Selected for Evaluation

The five alternatives that are compared in this chapter are the following:

1. No Build Alternative
2 Former Community Plan Alternative
3. Clustered Development Alternative
4. Reduced Project Alternative
5. General Plan Update Alternative

In the following sections, each alternative is first described and then analyzed in consideration of the proposed project according to whether it would have a beneficial or adverse effect. Subchapter 5.7 summarizes these findings and presents the conclusion about which alternative is the environmentally superior alternative as required by CEQA. Refer to Table S-2 for the comparison summary.

5.2 Analysis of the No Build Alternative

5.2.1 No Build Alternative Description and Setting

According to the CEQA Guidelines, the "no project" analysis shall discuss the existing conditions at the time the NOP is published, as well as what is reasonably expected to occur in the foreseeable future if the project is not approved (Section 15126.6 [e][2]). For the Cumming Ranch site, the No Build Alternative would most likely not include any residential development, at least in the near term. It is one of two "no project" alternatives analyzed per CEQA requirements. Although other development proposals could be pursued on the project site, any development would require a Specific Plan approval by the County Board of Supervisors. Thus,

development of the project site under the current S88 zoning could not immediately occur if the Cumming Ranch proposal is not approved. No figure is provided to depict this alternative, as no change or development would occur.

Under the No Build Alternative, it is unknown if farming of the site would continue. Currently, Areas A and B are used as farmland, and include approximately 400 acres of the 682.6-acre project site. However, due to the limited economic viability of agriculture on the project site, farming operations may cease under the No Build Alternative. Farming practices onsite currently rotate between nonirrigated oat-hay crops and cattle grazing.

No grassland acreage within the project site would be permanently preserved in the Ramona Grasslands Preserve under the No Build Alternative. No land in Area A would be dedicated as open space. Portions of Area C would continue to have limited vernal pool protection consistent with the 22.2 acres of conservation easements that currently exist in this area.

This alternative would not meet most of the basic project objectives. The land is designated as RL-40 and SR-2, with S88 Zoning, and there would be no mechanism to require or assume the project would become part of the Ramona Grasslands Preserve. Because the project site would not have open space designation or easement dedication, the project objective of accommodating the Ramona Grasslands Preserve would not be achieved, unless purchased outright by the County or a conservancy. As proposed by the applicant, one of the major objectives of the project is to provide a residential development that is reflective of Ramona's rural character and country lifestyle, and the No Build Alternative would not accomplish this, as no residential development would occur. In addition, an objective of the Cumming Ranch project is to implement a meaningful trail system based on community input, which would not be accomplished with the No Build Alternative, as no trail system would be constructed through the project site. Additionally, this alternative would not provide additional conserved acreage for specific environmental resources, protective buffers, or for integration of the existing Ramona Vernal Pool Preserve into the Ramona Grasslands Preserve.

5.2.2 Comparison of the Effects of the No Build Alternative to the Proposed Project

Transportation and Circulation

The No Build Alternative would not introduce any new land use at the project site; therefore, traffic would not increase with the implementation of the No Build Alternative. For this reason, the No Build Alternative would avoid the traffic impacts identified for the proposed project. The

significant but mitigable traffic impacts associated with the proposed project would not occur with this alternative.

Public Services and Recreation

Because no new development would occur on the project site, there would be no potential impact on existing infrastructure systems or community services. Thus, the No Build Alternative would be less impactive than the proposed project in consideration of these services and utilities. This alternative would avoid the significant but mitigable impacts associated with sewer and water service under the proposed project.

Biological Resources

The No Build Alternative would not place development on the project site and would not impact habitat types or wildlife species. Wildlife species would continue to use both the farmed and undisturbed areas of the site for habitat, foraging, and movement. While the project would formalize participation in the Ramona Grasslands Preserve, this alternative would allow a larger area to contribute to the preserve in its existing informal manner. The No Build Alternative provides greater biological benefit based on the diversity of habitats within Area A that would remain undisturbed under this alternative. The No Build Alternative, with or without farming activities, also ensures that wildlife movement could continue through the site. For these reasons, the No Build Alternative would result in less biological impact when compared to the proposed project.

Cultural Resources

As identified in Subchapter 3.2, there are numerous cultural resources within the project site. Some of these sites are located near and within areas that are currently farmed. It is possible that historical farming operations may have affected these resources, and the potential of future farming operations may result in a continuing impact on resources of unknown significance. Implementation of the proposed project could result in the destruction of some cultural resources, while others would be in preserved open space. However, maintaining the existing baseline conditions of the site with ongoing farming activities is considered less impactive than development of the site. Therefore, the impact is considered less when comparing the No Build Alternative to the proposed project.

Noise

The No Build Alternative would not introduce any residential uses to the project site, nor would it contribute to vehicle noise in the vicinity of the project. Thus, the No Build Alternative would result in less noise impact when compared to the proposed project.

Hazards and Hazardous Materials

The No Build Alternative would not introduce developed land uses into a wildland fire hazard area. For this reason, the No Build Alternative would avoid wildland fire hazards as compared to the proposed project.

Aesthetics and Visual Quality

The proposed project would alter and partially develop the existing scenic vista of the project site. The No Build Alternative would avoid this visual change because no new development would occur. The site would remain in its existing rural visual state. There would be less visual impact when comparing the No Build Alternative to the proposed project.

Air Quality

The potential continuation of farming practices would contribute particulate matter to the air basin through dust and equipment emissions. However, the No Build Alternative, with or without continued farming, would not contribute additional vehicle trips or other emission sources associated with development that could worsen air quality. The number of vehicle trips associated with the proposed project would generate more air pollution than the dust and emissions from the equipment associated with existing farming practices. For this reason, the No Build Alternative is considered to have less air quality impact than the proposed project.

Global Climate Change

The No Build Alternative would not introduce development to the project site. No emissions associated with construction activities, vehicle trips, or residential uses would result. Thus, the No Build Alternative would have less cumulative impact on global climate change than the proposed project.

Hydrology and Water Quality

If farming were to continue, the No Build Alternative would continue to generate pollutants from herbicides and sediment, as currently occurs with the ongoing agriculture activities. As described in Section 4.1.1, the proposed project would generate a similar amount of runoff as currently occurs onsite; however, all of this runoff would be treated through the biofilter system. It is assumed that, with continued agriculture practices, the use of herbicides would continue and would be treated by the natural vegetation and swales prior to reaching receiving waters. It is also assumed that the previously unexposed soils would create water erosion and untreated sediment runoff during harvesting and planting. Thus, with continued agricultural practices, the No Build Alternative would result in greater hydrology and water quality impacts than the proposed project. However, if farming activities were to cease, no chemical pollutants would result and sedimentation would decrease as the soil would not be exposed during portions of the year. Under a no-farming scenario, the No Build Alternative would result in fewer hydrology and water quality impacts than the proposed project.

Soils and Geology

The No Build Alternative would not introduce any new development onto the project site. The underlying geologic features would not be disturbed. The impact to soils and geology is considered to be less than the proposed project.

Agricultural Resources

Under the No Build Alternative, the project site may or may not continue to be used for agricultural purposes based on the limited economic viability of the site to support continued farming. However, the site is not designated as an important farmland site. For this reason, neither the No Build Alternative nor the proposed project would negatively affect significant agricultural resources.

Land Use and Planning

The No Build Alternative would result in no development on the project site. With an S88 zoning designation, the site is planned for residential development to accommodate future growth in the area. This alternative would not implement the zoning or former land use plan or goals outlined in the former Ramona Community Plan; however, vacant land would not result in any land use impact.

5.2.3 Rationale for Preference of the Proposed Project Design over the No Build Alternative

The No Build Alternative was rejected in favor of the proposed project because it does not meet the goals and objectives of the project. The No Build Alternative would result in fewer environmental impacts than the proposed project. However, many of the project goals could not be achieved, including the development of a residential community reflective of the Ramona rural character and integration of that residential community into the adjoining Ramona Grasslands Preserve. The No Build Alternative also would not achieve the goal of accommodating the Ramona Grasslands Preserve in a manner that helps to ensure the Ramona Grasslands Preserve concept becomes a reality because no property would be donated or sold for formal conservation purposes in this grassland preserve effort; however, the land would continue to contribute to the grasslands in the existing informal manner. The No Build Alternative would also not result in a community trail system, provide additional protective buffers, or facilitate the formal integration of the existing Ramona Vernal Pool Preserve into the Ramona Grasslands Preserve.

5.3 Analysis of the Former Community Plan Alternative (Developed prior to adoption of the new Ramona Community Plan in 2011)

5.3.1 Former Community Plan Alternative Description and Setting

To consider the implications of implementation of the former Ramona Community Plan Alternative, land use directives for the site are considered. According to the CEQA Guidelines, the "No Project" analysis shall discuss the existing conditions (i.e., No Build Alternative described above), as well as what is reasonably expected to occur in the foreseeable future if the project is not approved. This alternative is considered a reasonable foreseeable future project, as it is based on the SPA for the site; therefore, this alternative is also considered a "No Project" alternative under CEQA.

Under this alternative, development would presumably occur on the Cumming Ranch site according to the former Ramona Community Plan, which described the Cumming SPA (0.25) and permitted "166 single-family dwelling units ranging in size from 2 to 4 or more acres," and also permitted industrial use adjacent to Ramona Airport. The industrial use was described as "adjacent to the south of the Ramona Airport, and north of the 100-year floodplain," and it assumed the uses to be of the type allowed in the M52 Use Regulations of the County Zoning Ordinance (Limited Impact Industrial Use, which includes custom manufacturing). A conceptual site plan for this alternative is shown in Figure 5-1. This alternative could not have proceeded

without the approval of a Specific Plan and TM for the property under these parameters. For this reason, this alternative was not presumed to be the immediate outcome if the Cumming Ranch project is not approved. However, it is a development scenario that could have been pursued in place of the proposed project, consistent with former Ramona Community Plan development policies. As described below, this alternative development plan did not meet the exact specifications of the Cumming Ranch SPA, as the development need to be consistent with County RPO and other policies.

The Former Community Plan Alternative included the development of 127 residential lots throughout Area A. The Cumming Ranch SPA would have allowed for development of residential properties on Area B; however, due to County RPO requirements, development in that area is not feasible. Therefore, in this alternative design, Area B would have remained as open space with possible ongoing farming activities. Due to these constraints, the alternative design could not accommodate the full 166 residential lots as described in the Cumming Ranch SPA. The preserved acreage in Area C would have been reduced due to the industrial development adjacent to the Ramona Airport, which was envisioned by the former Ramona Community Plan. The residential lots would have been between 2 and 4 acres and would have been on septic systems due to their size. The industrial development would have been on sewer service. All open space areas would have been placed in open space easements within the residential lots. All sensitive biological or cultural resources located within private lots would have required backyard easements.

This alternative would not be able to accommodate the Ramona Grasslands Preserve in a manner that would help to ensure the preserve becomes a reality, because development would have occurred in areas critical to the connectivity of surrounding open space areas. Area C would have been partially developed with industrial uses and would have substantially reduced the connectivity to the east and southeast. Because of this, the alternative would also not have met the project objective of designing a project that would seamlessly integrate with the grasslands as, the grassland area could not adequately connect through or co-exist with the industrial development portion of Area C. This alternative could have met the project objective of providing a residential development that is reflective of Ramona's rural character and country lifestyle by providing large lot sizes and provisions for large animal keeping and the possible preservation of natural features within the lots. Trails could have been provided throughout the project area in a manner similar to the proposed project to meet the trails objective. However, due to the increased development footprint, the trails would have been required to traverse private property with easements, which could have resulted in some access and maintenance challenges. In addition, due to the industrial component in Area C that would have been developed under this alternative, it is unlikely that habitat could be preserved to the same degree

as the proposed project, resulting in a decline in the ability of the alternative to meet the project objective of providing protective buffers and additional preserve acreage in relation to the vernal pool habitats located in Area C.

5.3.2 Comparison of the Effects of the Former Community Plan Alternative to the Proposed Project

Transportation and Circulation

The Former Community Plan Alternative would introduce two new land uses at the project site: residential and industrial. This alternative would increase traffic due to 127 new homes and employees and delivery trips related to the industrial uses as compared to the 125 residential units with the proposed project. This traffic increase would result in a minimal increase of an additional 24 ADT due to increased residential units; however, approximately 984 additional ADT from the industrial development (assuming warehouse use at 60 trips per acre) would be added. The total addition of approximately 1,000 ADT generated by the Former Community Plan Alternative is an increase of approximately 65% compared to the proposed project. The severity of the significant traffic impacts associated with the proposed project would increase with this alternative.

Public Services and Recreation

This alternative would accommodate an additional two housing units beyond the proposed project, as well as an industrial development onsite. When compared to the proposed project, this alternative would result in an increased demand for infrastructure and community services, such as fire and law enforcement, water and sewer service, and solid waste services, mostly attributable to the industrial development. The significant but mitigable sewer and water service impacts associated with the proposed project would also occur with this alternative, and possibly increase in severity due to additional industrial demands.

Biological Resources

Based on design of the Former Community Plan Alternative, there would be a potential for sensitive biological resources located in Area C to be disturbed, such as the vernal pools. The industrial development described in the existing Ramona Community Plan would be located generally south of the airport and north of Santa Maria Creek, which is generally the boundary of Area C. As shown in Figure 5-1, the industrial development is assumed to be located in the northwest corner of Area C to best avoid vernal pools; however, this would reduce the ability to

provide protective buffers for the vernal pools. If a portion of Area C were to be developed, the connectivity of the site as a wildlife movement corridor to grassland areas northwest and southeast would be reduced. The development of 127 housing units on 2- to 4-acre lots would have the potential to impact additional biological resources beyond those associated with the development of 125 units in the proposed project. Less community open space would be included in this alternative, a decrease of approximately 145 open space acres when compared to the proposed project. The community open space included in the proposed project would be replaced with required backyard easements. For these reasons, this alternative would result in greater biological impacts than the proposed project.

Cultural Resources

This alternative would place development in areas with known cultural resource sites. In addition, the increased residential units and larger development footprint would require sites to be protected in backyard easements, with a greater potential for indirect impacts to occur. When compared to the proposed project, this alternative would have a greater impact on cultural resources.

Noise

It is assumed that similar noise impacts from Highland Valley Road would occur to residential lots located along the roadway under the Former Community Plan Alternative. However, because there would be a substantially higher number of vehicle trips and large industrial truck trips resulting from this alternative, the noise generated by the higher traffic volume and large heavy trucks would be increased. Noise generation onsite would increase with the inclusion of industrial development on the site, and may include noise from sources such as machinery or delivery vehicles. This onsite noise generation would have the potential to result in a noise impact to the residences beyond what would occur with the proposed project.

Hazards and Hazardous Materials

The Former Community Plan Alternative would continue to result in a substantial interface with potential wildland fires. The potential for wildfire hazards would be similar to the proposed project. Dependent on the types of uses in the industrial development area, it is possible that hazardous materials may be transported and used on the site, thus increasing hazard potential.

Aesthetics and Visual Quality

From Highland Valley Road and SR 67, the visual impact of the Former Community Plan Alternative would result in additional visual impacts as compared to the proposed project. As shown in Figure 5-1, the residential lots would encroach up hillsides and into the main ridgeline and other knolls throughout the property. These homes would be in more visually prominent locations. This alternative could result in the loss of unique landforms and native vegetation. Negative visual effects would also be associated with the larger overall development footprint and increased scale of this alternative. The industrial development south of the airport may be visible to receptors in the Ramona Town Center located adjacent to the east of this area. The potential visual impact to the Ramona Town Center would be greater than what would occur with the proposed project.

Air Quality

This alternative would result in more vehicle trips per day from the additional residences and industrial use, resulting in greater air pollutant emissions. It is likely that with industrial development on the site, large delivery-type trucks would travel to the site and increase potential air quality emissions. In addition, it is unknown what specific type of industrial use would be developed onsite, and this use may potentially increase air pollution. During construction, encroachment of lots into the steeper hillsides and knolls would result from additional grading, and increased fugitive dust could occur.

Global Climate Change

The Former Community Plan Alterative would result in increased development on the project site. There would be more vehicle trips per day from the additional residences and the industrial use, resulting in greater vehicle emissions. There would potentially be additional emissions specific to the industrial operations onsite. For these reasons, this alternative would have a greater cumulative impact on global climate change than the proposed project.

Hydrology and Water Quality

This alternative would result in increased runoff from the additional impervious surfaces associated with the increased housing units, increased roadways, and industrial component. Based on the type of industrial development, pollutant loads in runoff could also increase. For this alternative, wastewater disposal for residential lots is assumed to be accommodated by septic

systems. This could have the potential to negatively affect local groundwater. This alternative would have a greater impact to hydrology and water quality.

Soils and Geology

Additional homesites and the industrial component of the Former Community Plan Alternative would require increased grading and potential placement of structures on unstable soils or geologic features. Residential lots would encroach into the main ridgeline and other knolls on the site, and could increase the potential for erosion and unstable soil conditions. This alternative would result in increased potential for soil and geology impacts.

Agricultural Resources

Similar to the proposed project, this alternative would not develop residential uses within Area B, and farming may or may not continue within this area. Therefore, this alternative is considered similar to the proposed project, and would not result in any significant agricultural resource impacts.

Land Use and Planning

This alternative would develop the site as closely as possible to the specified Cumming Ranch SPA in the former Ramona Community Plan. The large lot sizes would be consistent with the Ramona Community Plan and would meet the community character goal. However, this alternative would not necessarily preserve unique and natural landforms on the project site, as directed by the Ramona Community Plan. In addition, approval would be subject to CEQA because a Specific Plan would still need to be developed for this alternative. The Former Community Plan Alternative would now have greater land use impacts than the proposed project because the current General Plan does not include industrial development.

5.3.3 Rationale for Preference of Proposed Project Design over the Former Community Plan Alternative

The Former Community Plan Alternative was rejected in favor of the proposed project for multiple reasons. This alternative would not meet some of the goals of the proposed project. It would not accommodate the Ramona Grasslands Preserve via meaningful participation because no substantial amount of land would be formally included in the Ramona Grasslands Preserve from Area A or C. Industrial development would occur in Area C, which is a critical and environmentally sensitive linkage to the grasslands to the northwest of the site. Because of this

industrial development, it would not be possible to meet the goal of a seamless integration of the project with the grasslands as connectivity to surrounding open space areas. Development in Area C would also encroach upon, rather than provide additional acreage for, protective buffers and would not facilitate integration of the existing Ramona Vernal Pool Preserve into the Ramona Grasslands Preserve.

5.4 Analysis of the Clustered Development Alternative

5.4.1 Clustered Development Alternative Description and Setting

This alternative would cluster a development of 166 residential units, with all of the lots and homes located to the south of Highland Valley Road. What is known as Area A would be located entirely to the south of Highland Valley Road on approximately 150 acres. Area B would be increased to 410 acres and Area C would remain the same (Figure 5-2). The lots would have a minimum lot size of 0.5 acre. The lots would be a typical urban tract-style design and require that 100% of each lot be graded. This would require mass grading to accommodate the development. The grading requirement would necessitate approximately 500,000 cubic yards of balanced cut and fill. The lots would be graded with terraced slopes between street levels. Manufactured slopes would be up to 28 feet high. This alternative would require the development of the knolls within the area south of Highland Valley Road, and natural landforms, such as rock outcroppings, would likely be removed. This alternative was designed to avoid the drainages through the area. This alternative would result in the preservation of less open space south of Highland Valley Road, due to a relatively higher density of homes in this area. Sewer service would be required for this alternative, and the connection through the area north of Highland Valley Road to SMWWTP would be necessary, as would the sewer lift station. Because there is no development planned north of Highland Valley Road, the trails system as proposed by the project would depend on future use/ownership of the northern property, and would not be built or funded by the applicant. The pathway along Highland Valley Road from SR 67 to the project would still be constructed.

This alternative would meet some of the project objectives. It could accommodate and expand the Ramona Grasslands Preserve in a manner that would help ensure the Ramona Grasslands Preserve concept becomes a reality, because the areas north of Highland Valley Road could be protected or made available for acquisition as open space. The design of this alternative would allow for continued grasslands connectivity through Areas B and C. The Clustered Development Alternative would provide for the integration of the existing Ramona Vernal Pool Preserve into the Ramona Grasslands Preserve, and preservation of all vernal pool areas within Areas B and C would result. However, the character of the residential development provided by this alternative

would not be consistent with Ramona's rural character and country lifestyle when compared to the proposed project, and would not meet the objective to design a project that is compatible with the Ramona community. The residential units would be clustered and tract-style, with less open space directly adjacent to most of the residential lots. The urban-style lots would be uniform in size, shape, and alignment, with mass-graded stepped pads, and the home designs would be limited in variation and appearance. This type of development is not consistent with the surrounding residential areas, and would not be consistent with the rural character of Ramona. There would be no provisions for large animal keeping. All natural vegetation within lots would be replaced with ornamental landscaping, and natural land features would be lost. This alternative would also not seamlessly integrate with the grasslands, as the development would be more separate and isolated from the open space preserve, rather than integrated with the preserve. The open space areas that are provided along the drainages would not function as an amenity of the project. The objective to provide a scenic and meaningful trail system for the community would not be met, as only the pathway along Highland Valley Road would be constructed as part of the project.

5.4.2 Comparison of the Effects of the Clustered Development Alternative to the Proposed Project

Transportation and Circulation

This alternative would develop 41 additional residential units as compared to the proposed project, and there would be an increase of approximately 490 ADT, resulting in a greater amount of project-generated traffic. Therefore, increased traffic impacts would occur to the same surrounding roadways and intersections with the Clustered Development Alternative as with the proposed project. With the Clustered Development Alternative, the same number of project entrances would still be located off of Highland Valley Road. The opportunity for nonvehicle transportation would be reduced due to the loss of the trail system through the project site. The significant but mitigable traffic impacts of the proposed project would also occur with this alternative, and increase in severity due to increased daily trips.

Public Services and Recreation

Because this alternative would accommodate 41 more residential units than the proposed project, it would result in increased demand for infrastructure and community services. The alternative would require sewer service for the residential development, and the connection would likely need to pass through the area north of Highland Valley Road to connect to the SMWWTP and would require a sewer lift station. The additional units in this alternative would increase demand

for sewer and water service, solid waste service, police and fire protection, school services, and recreational facilities; however, this increase is not considered substantial, and the impact is considered similar to the proposed project. Sewer and water service impacts associated with the proposed project would also occur under this alternative, and likely increase in severity due to increased service demand.

Biological Resources

This alternative would place all development entirely south of Highland Valley Road, and it is assumed that all biological resources would be affected in this area. The design of the project would allow for protection of the drainages that pass through the area. However, this alternative would allow for the potential preservation of the entire property located on the north side of Highland Valley Road, which has a high biological value, or for the agricultural operations to continue. The area north of Highland Valley Road provides a greater biological diversity and is adjacent to Etcheverry Creek. The adjacency to the creek and the open areas of Areas B and C would allow for a large contiguous parcel for wildlife use and movement. For these reasons, the Clustered Development Alternative would have less impacts than the proposed project when considering biological resources.

Cultural Resources

It is assumed that the Clustered Development Alternative would impact all cultural resources located in the development area. There are multiple cultural resources sites located in the development area south of Highland Valley Road that would be preserved in open space under the proposed project. However, multiple known cultural resource sites on the north side of Highland Valley Road would be entirely avoided with this alternative, because no development would occur. Because the majority of known sensitive cultural resources areas within the project site are located north of Highland Valley Road, and this area would potentially be located in preserved open space, it is assumed that there is the potential for less cultural resource impacts to result from the Clustered Development Alternative when compared to the proposed project.

Noise

This alternative would place more than twice as many lots in the area south of Highland Valley Road as compared to the proposed project. Under the proposed project, the majority of the noise impacts occur to residential lots along Highland Valley Road. Approximately 17 units adjacent to the southern side of the Highland Valley Road would be affected; only four lots would be affected on the north side. As shown in Figure 5-2, due to the dense nature of this alternative,

there would be approximately 25 residential lots adjacent or in proximity to Highland Valley Road. This would increase the number of lots with a significant noise impact resulting from exposure to roadway traffic. It is likely that extensive, long-wall-style noise barriers would be required to address the potential noise impacts to these residential receptors, as the compact, tract-style design is not conducive to individual walls. Also, roadway traffic noise may be increased due to the additional ADT generated by this alternative.

Construction of the Clustered Development Alternative would require mass grading, approximately three times the amount of grading required for the proposed project. This extensive soil work would generate increased construction noise levels as compared to the proposed project, specifically along the southwestern boundary of the project where sensitive noise receptors are located adjacent to the construction area. In addition, because the dense, clustered residential design would require development of the knolls south of Highland Valley Road, these features would probably require blasting during construction, as granitic rock material would likely be encountered. For this reason, the noise impact would be greater for the Clustered Development Alternative than for the proposed project.

Hazards and Hazardous Materials

The Clustered Development Alternative would cluster all development together and reduce the amount of interface with potential wildfire areas. This clustering would reduce the number of homes that would be adjacent to open areas. In addition, the areas surrounding the portion of the site south of Highland Valley Road are generally developed with existing residential areas rather than the large areas of open lands to the north and northwest of the site on the north side of the road. When compared to the proposed project, this alternative would have less impact when considering wildfire and airport hazards.

Aesthetics and Visual Quality

The Clustered Development Alternative would create a greater visual impact to motorists on SR 67 and Highland Valley Road. The portion of the site that is located south of Highland Valley Road is the most visible portion of the site from SR 67, and the scenic quality would have a greater impact from the more dense clustered development due to smaller lot sizes compared to the proposed project. The project would appear more intense and uniform, as lots would be mass graded and homes would be in alignment with limited variation. This alternative would result in the loss of unique landform features, such as the knolls in this area, rock outcropping, and stands of oak trees. Native vegetation would be replaced with ornamental landscaping. Due to noise impacts, the alternative would require extensive noise barriers (walls) adjacent to the south side

of Highland Valley Road. The project would be seen from SR 67, a locally designated scenic roadway in the Ramona Community Plan; therefore, the visual impact resulting from this alternative would be more substantial than the proposed project.

Air Quality

The Clustered Development Alternative would result in additional ADT and, thus, would generate a slightly greater amount of air pollution due to traffic. An increase in air quality emissions would also occur during construction of this alternative. Because of the clustered tract-style type of development necessary to accommodate all units on the south side of the roadway, lots would be 100% graded with up to 28-foot-high cut slopes. This would require mass grading of approximately 500,000 cubic yards of cut and fill, which is three times the amount required for the proposed project. This extensive grading activity would result in increased dust during construction and the need for additional construction equipment with their associated diesel emissions. Thus, air quality impacts would be greater with this alternative when compared to the proposed project.

Global Climate Change

The Clustered Development Alterative would result in increased short-term construction emissions due to mass grading. Increased vehicle trips and residential uses would also generate increased emissions. However, in consideration of the overall cumulative nature of climate change, the increased emissions from the Clustered Development Alternative would not create a substantial difference relative to the proposed project. The cumulative climate change impact is considered to be similar for this alternative as compared to the proposed project.

Hydrology and Water Quality

This alternative would result in a greater number of units when compared to the proposed project, and would result in an increased amount of impervious surface. In addition, there would be a reduced area of open space incorporated throughout the development footprint that would serve as a natural biofilter. The significantly increased amount of grading required for this alternative and the density of the associated impervious surfaces would increase the potential for runoff and erosion-related water quality impacts throughout the construction and operation periods. This alternative would have a potentially greater impact to hydrology and water quality than the proposed project.

Soils and Geology

This alternative would require mass grading to accommodate all the units in the area south of Highland Valley Road. The increased amount of earthwork required for this alternative would increase the potential for erosion-related impacts. In addition, the development footprint of this alternative would include the knolls and significant rock outcroppings south of Highland Valley Road. It is likely that these rock features would require blasting to accommodate construction of the residential lots, and rockfall hazards could be created. Therefore, this alternative would have a greater impact to soils and geology than the proposed project.

Agricultural Resources

Similar to the proposed project, this alternative would not result in any significant agricultural resource impacts. However, the area north of Highland Valley Road could continue to be farmed, or it could be preserved as part of the Ramona Grasslands Preserve, but the amount of farmland that would be converted to another use is less than with the project.

Land Use and Planning

The Ramona Community Plan emphasizes the importance of the rural character of the area. The Clustered Development Alternative would create a dense, clustered residential development on small parcels, approximately 0.5 acre each. This alternative would almost double the amount of residential lots and density south of Highland Valley Road as compared to the proposed project. The lots would be stepped and mass graded, and the homes would be uniform with little variation. This type of dense development does not blend with the atmosphere and community character of the surrounding area, or achieve the goals of the Ramona Community Plan. This alternative would be required to be compliant with the County RPO and, thus, was designed to avoid drainages and would require backyard easements for protection of sensitive resources. This alternative would introduce an urban-style development to the area, and this is not consistent with the rural character goals of the community plan, nor does it blend with or complement the existing development in the area. For this reason, the Clustered Development Alternative would result in greater land use and planning effects than the proposed project.

5.4.3 Rationale for Preference of the Proposed Project Design over the Clustered Development Alternative

The Clustered Development Alternative was rejected in favor of the proposed project because the dense, tract-style development does not meet the project's goal of providing a residential

development that is reflective of Ramona's rural character and country lifestyle. The density that would be required to locate all 166 residential lots on the southern side of the road would create a development that is much denser than the surrounding area and would not blend with the existing community character of the Ramona area. The clustered development would potentially avoid some of the environmental impacts that would result from the proposed project; however, it would accomplish this through a development style that is contradictory to the goals and objectives of the Ramona Community Plan. The urban-style development that would occur with the Clustered Development Alternative would not be compatible with the rural lifestyle promoted in the Ramona Community Plan and reflected in the existing development surrounding the project area. The alternative also does not meet the objective to design a project that integrates the development area with the surrounding grasslands, as the residential area would be completely isolated from the open space areas north of Highland Valley Road. This alternative would not develop a trail system through areas north of Highland Valley Road and, therefore, could not meet the project objective to provide a scenic and meaningful trail system. For these reasons, the proposed project is preferred over the Clustered Development Alternative.

5.5 Analysis of the Reduced Project Alternative

5.5.1 Reduced Project Alternative Description and Setting

This alternative would maintain the same Areas A, B, and C as defined for the proposed project. The project site would be developed with small ranchettes with a 4-acre minimum lot size. With this lot size, the alternative would be designed to accommodate a maximum of 47 residential lots, 78 less than the proposed project. This alternative is shown in Figure 5-3. Because of the large lot sizes, it is assumed that all the ranchettes would be dependent on septic systems. The development area would extend throughout the majority of Area A, and would allow for development of the trail system similar to what is designed with the proposed project. To accommodate the 4-acre lots, the individual lots would encroach into upland habitats and landforms, although not all of the lots would be graded by the project proponent beyond the development pad. Animal keeping would be allowed within the large lot size. It is likely that natural landforms could be preserved within the large lots. The alternative was designed to protect drainages throughout the site. This alternative would include 300-foot setbacks from Highland Valley Road and 795-foot setbacks from SR 67 to avoid encroachment into areas with noise levels above those allowed by the Ramona Community Plan.

This alternative would generally meet all of the project objectives. The Reduced Project Alternative could accommodate the Ramona Grasslands Preserve in a manner that would help to ensure that the preserve concept becomes a reality, since because Areas B and C would be

available for preservation in a manner similar to the proposed project. This would allow a large portion of the project site to be incorporated into the Ramona Grasslands Preserve and for connectivity to continue through the site. The objective of the project to provide a residential development reflective of the Ramona rural character and country lifestyle would be met by this alternative, as the 4-acre lots would be compatible with the surrounding uses and rural character of the community. The design would allow for minimal grading techniques, as the pads could be individually graded within the lots and natural features could be preserved. The Reduced Project Alternative could meet the seamless integration with the grasslands objective; however, the development footprint with large-sized lots would encroach into upland areas and reduce the use of these knolls and hillsides by wildlife. This would reduce the alternative's ability to meet the seamless integration objective, although the large lot sizes would allow for native vegetation. The design of the development could accommodate the trails, similar to the proposed project. The objective to provide additional buffers and integrate the Ramona Vernal Pool Preserve into the Ramona Grasslands Preserve could also be accomplished, similar to the proposed project, in Areas B and C.

5.5.2 Comparison of Effects of the Reduced Project Alternative to the Proposed Project

Transportation and Circulation

It was assumed that this alternative could be developed to accommodate approximately 47 residential lots and still generally meet the project objectives. This is 78 fewer homes than with the proposed project. Therefore, the vehicle trip generation of this alternative would be approximately 936 fewer daily trips compared to that of the proposed project. Trip distribution would not be substantially different when compared to the proposed project. For these reasons, the Reduced Project Alternative would result in fewer transportation and circulation impacts than the proposed project. The significant but mitigable traffic impacts associated with the proposed project would still occur with this alternative, but the severity of the impacts would decrease due to the reduced number of vehicle trips.

Public Services and Recreation

Because this alternative includes 78 fewer homes than the proposed project, it would generate less demand for infrastructure and community services. There would be less demand for sewer lines and service, although it would not be precluded. Homes would more likely be on septic systems, which are less expensive. With only 47 lots, it may not be economical to connect to a sewer system, although it would be feasible. For this reason, this alternative may have less impact on infrastructure and community services when compared to the proposed project. The

requirement for water service associated with the proposed project would remain for this alternative, but would significantly decrease due to reduced service demand.

Biological Resources

As shown in Figure 5-3, residential lots in this alternative would surround and encroach into the main ridgeline in Area A. This would isolate the ridgeline from nearby areas of open space and grasslands. The connectivity of the ridgeline and upland habitats would be limited to open space through the residential lots. The large lots would encroach into upland habitat areas of both the main ridgeline and the knolls and stands of trees, specifically oaks, in the area south of Highland Valley Road. While open space easements would accomplish avoidance of some resources, this alternative could result in increased indirect biological resource impacts as compared to the proposed project. However, the alternative would preserve Areas B and C in the same manner as the proposed project.

Cultural Resources

Similar to the proposed project, this alternative would include roadways and residential lots located in areas of known cultural resource sensitivity. However, additional significant cultural resources would be located within easements on individual lots. Additional mitigation measures would likely be required for this alternative. The potential for indirect impacts to cultural resources would be greater with this alternative as compared to the proposed project.

Noise

This alternative would include lot design that incorporates a 300-foot setback from Highland Valley Road to avoid placement of lots within areas with noise levels above the standard allowed by the Ramona Community Plan. A 795-foot setback from SR 67 would also be included to avoid noise impacts resulting from that roadway. As described in the Noise section of this EIR, residential lots located adjacent to Highland Valley Road and near SR 67 would be exposed to potentially significant noise impacts. Therefore, the lot design in this alternative with appropriate setbacks from the roadways would avoid a significant noise impact resulting from exposure to roadway traffic. Also, because the ADT would decrease with this alternative, less traffic noise would be generated. Less noise impact would result with this alternative as compared to the proposed project.

Hazards and Hazardous Materials

The Reduced Project Alternative would continue to result in a substantial interface with potential wildland fires, since it has a similar type of residential design as the proposed project. The potential for wildfire hazards would be similar to the proposed project.

Aesthetics and Visual Quality

The visual impact of this alternative would be similar to the proposed project, as the homes would be located on large lots, and native vegetation and landforms could be incorporated into the lots. The future homes may be more visible to motorists on SR 67 and Highland Valley Road, as the lots encroach into the uplands areas and knolls across the site. There may be additional loss of landforms and natural elements, such as stands of trees or rock outcroppings within private lots, dependent on individual lot owners. However, due to the similar minimalist design of the alternative, the ability to maintain large lots with unique layouts, the use of native vegetation, and the ability for large-animal keeping, this alternative would result in similar aesthetics and visual quality impacts when compared to the proposed project. This alternative would include setbacks from Highland Valley Road and SR 67 to avoid potential noise impacts and eliminate the need for noise barriers as potential noise abatement. In comparison to the proposed project, which would require noise abatement measures in the noise protection easement areas, the Reduced Project Alternative would have fewer visual impacts, as no noise barriers would be required.

Air Quality

This project would have a substantially lower unit count and result in fewer air quality emissions from reduced traffic generation. However, the development would require increased grading into hillsides, thus increasing dust and other construction-related air emissions. Overall, the air quality impacts resulting from this alternative would be generally less than the proposed project.

Global Climate Change

The Reduced Project Alterative would result in increased short-term construction emissions due to increased mass grading. Emissions from vehicle trips and residential uses would be deceased due to the reduced unit count. However, in consideration of the overall cumulative nature of climate change, the slightly decreased emissions from the Reduced Project Alternative would not create a substantial difference relative to the proposed project. The cumulative climate change impact is considered to be similar for this alternative as compared to the proposed project.

Hydrology and Water Quality

The Reduced Project Alternative would result in a reduced amount of impervious surface due to the reduced number of homes as compared to the proposed project. Therefore, water quality impacts, such as runoff and sedimentation, would be considered similar to the proposed project. However, there would be an increased potential for groundwater quality impacts due to the use of septic systems for all of the residential units.

Soils and Geology

This alternative would accommodate a lower unit count as compared to the proposed project, but would result in additional encroachment into the uplands of the main ridgeline and into the knolls south of Highland Valley Road, and could result in slightly increased erosion potential. However, because this alternative is designed in a minimalist manner and would not mass grade the project site, the soils and geology impacts are considered similar to the proposed project.

Agricultural Resources

This alternative would have agricultural impacts similar to the proposed project, as the land uses for Areas A, B, and C would generally be the same. Agricultural activities would cease on Area A and be dependent on future management plans for Area B.

Land Use and Planning

The Reduced Project Alternative would include the same residential land uses as the proposed project and in the same general areas. The large lot sizes would accommodate large-animal keeping, would be consistent with the Ramona Community Plan, and would meet the rural character goal of the plan. Some unique features, such as the knolls and stands of trees, would be within lots on the south side of Highland Valley Road. The project was designed to be consistent with the County RPO, but would require backyard easements over sensitive resources for protection of these resources, per the RPO. The 4-acre lot size would be compatible with surrounding residential land uses. Therefore, this alternative would be similar when considering land use and planning as compared to the proposed project.

5.5.3 Rationale for Preference of Proposed Project Design over the Reduced Project Alternative

The Reduced Project Alternative would generally accomplish the goals and objectives of the proposed project, although the isolation of the main ridgeline and knolls may result in reduced

connectivity to the grasslands and the ability of the alternative to meet the project objective to design a seamless integration of the development portion of the project with the surrounding open space. Although the large lot size is consistent with the Ramona Community Plan and the typical development in the project area, the lots would encroach into the upland habitats of the main ridgeline in Area A, and would require development of the knolls south of Highland Valley Road. The loss of these unique landforms would be detrimental to both the visual quality of the project and biological function of the site. The main ridgeline would be isolated from other open space and grassland areas, and connectivity would be reduced as compared to the proposed project. For these reasons, the proposed project is preferred over this alternative.

5.6 Analysis of the General Plan Update Alternative

5.6.1 General Plan Update Alternative Description and Setting

This alternative is based on the proposed General Plan Update map (County of San Diego 2009) that shows the southern portion of the plan area as Semi-Rural Residential (SR-2), the middle portion as Semi-Rural Residential (SR-10), and the northern portion as Rural Lands (RL-40). Areas A, B, and C would be maintained with the boundary between A and B, shifting northerly to Etcheverry Creek. The project site would be developed with 81 one-acre-minimum lots south of Highland Valley Road and 31 five-acre-minimum lots to the north. Areas B and C would remain as open space. This alternative would be designed to accommodate a maximum of 112 residential lots, which is 13 less than the proposed project. The alternative is shown in Figure 5-4. It is assumed that sewer service would be provided for all lots. Sewer service would be required for the lots south of Highland Valley Road, and the connection through the area north of Highland Valley Road to the SMWWTP would be necessary, as would the sewer lift station. The larger lots located to the north might be able to use onsite septic systems, but since sewer lines would be installed through that area, it is assumed that all lots would connect to the sewer system. The residential area would be increased by 38.6% and open space would be reduced compared to the proposed project. The lots would use a similar roadway system for access, with some additional roadway to provide access to the most northerly lots. The overall amount of grading would be less for the residential lots due to the decreased number, but greater for the roadways due to the increased length of roadways. Animal keeping would be allowed within the larger lot sizes. It is likely that natural landforms could be preserved within the large lots. The alternative was designed to minimize impacts to drainages throughout the site.

The General Plan Update Alternative would meet most of the project objectives. The objective of the project to provide a residential development reflective of the Ramona rural character and country lifestyle would be met by this alternative, as the lots would be compatible with the

surrounding uses and rural character of the community. The design would allow for minimal grading techniques, as the pads could be individually graded within the lots and natural features could be preserved. The objective to provide additional buffers and integrate the Ramona Vernal Pool Preserve into the Ramona Grasslands Preserve would be met. However, this alternative would not accommodate the Ramona Grasslands Preserve in the same manner as the proposed project, because a larger portion of Area A would be in private ownership. This would reduce the acreage of the project site that would be incorporated into the Ramona Grasslands Preserve, and reduce connectivity through the site. The objective of seamless integration with the grasslands would not be fully met with this alternative due to the reduction in available open space and reduced connectivity through the site. The design of the development could accommodate the trails similar to the proposed project, but trails would be located on easements within residential lots.

The main difference between the proposed project and the General Plan Update Alternative is that the proposed project places approximately 54 lots (between 1 acre and 2 acres in size) north of Highland Valley Road, whereas the General Plan Update Alternative places 31 lots (approximately 5 acres in size) in a slightly expanded development area. This alternative assumed that this area would allow 5-acre-minimum lot sizes, because the majority of the area was designated as SR-10 land use. At the time the EIR was prepared, it was assumed that development projects would be able to attain lot sizes that were at least half the size of the planned density. However, when the General Plan Update was adopted in August 2011, it included policies that allowed projects to shift density within the project site,[1] and it explicitly stated that planned densities were intended to be achieved through the subdivision process.[2] Therefore, the General Plan Update Alternative is not reflective of what is allowed under the General Plan update. The General Plan Update Alternative was an alternative that looked at placing larger lots north of Highland Valley Road based on the SR-10 density designations, and by slightly expanding the development area farther to the east.

[1] LU1.8 Density Allocation on Project Sites. Permits changes in density within a project site with parcels that have more than one land use designation to provide flexibility in project design only when approved by Major Use Permit or Specific Plan. The policy does not allow a project to receive more units than it established by the Land Use Maps nor to supersede Housing Element requirements related to the County's Regional Housing Needs Allocation.

[2] LU-1.9 Achievement of Planned Densities. Recognizing that the General Plan was created with the concept that subdivisions will be able to achieve densities shown on the Land Use Map, planned densities are intended to be achieved through the subdivision process except in cases where regulations or site-specific characteristics render such densities infeasible.

5.6.2 Comparison of Effects of the General Plan Update Alternative to the Proposed Project

Transportation and Circulation

The General Plan Update Alternative would provide 13 fewer homes than the proposed project. Therefore, the vehicle trip generation of this alternative would be approximately 156 less daily trips than the proposed project. Trip distribution would not be substantially different when compared to the proposed project. For these reasons, the General Plan Update Alternative would result in slightly less transportation and circulation impacts than the proposed project. The significant but mitigable traffic impacts associated with the proposed project would still occur with this alternative; however, the severity of the impacts would decrease due to the reduced number of vehicle trips.

Public Services and Recreation

Because this alternative includes 13 less homes than the proposed project, it would generate less demand for infrastructure and community services. The demand for sewer service would be less than the proposed plan. The requirement for water service associated with the proposed project would remain for this alternative, but would decrease due to reduced service demand. For these reasons, this alternative would have less impact on infrastructure and community services when compared to the proposed project.

Biological Resources

As shown in Figure 5-4, residential lots in this alternative would impact a greater area as compared to the proposed project. There would be a 38% increase in direct impacts with this alternative. A new wetland crossing would be required to provide access to the northern lots in Area A. These additional lots would also reduce connectivity through the site to adjoining grassland habitats. This alternative could result in decreased indirect biological resource impacts as compared to the proposed project due to the reduced number of lots. The alternative would preserve Areas B and C in a similar manner as the proposed project; however, Area B would be decreased by approximately 69 acres.

Cultural Resources

As in the proposed project, this alternative would include roadways and residential lots located in areas of known cultural resource sensitivity. Direct impacts to cultural resources would

substantially increase, as would indirect impacts, due to the increase in residential areas and decrease in open space.

Noise

This alternative would place fewer lots in the area north of Highland Valley Road as compared to the proposed project. Under the proposed project, the majority of the noise impacts would occur to residential lots along Highland Valley Road. Approximately 17 units adjacent to the southern side of the Highland Valley Road would be affected; only four lots would be affected on the north side. As shown in Figure 5-4, there are approximately 19 residential lots that would be affected on the south side of Highland Valley Road and two lots that would be affected to the north. For both the proposed project and this alternative, 19 lots would be affected by traffic-generated noise. This alternative would have the same traffic noise impacts when compared to the proposed project.

Hazards and Hazardous Materials

The General Plan Update Alternative would continue to result in a substantial interface with potential wildland fires, with a similar type of residential design as the proposed project. The potential for wildfire hazards would be similar to the proposed project.

Aesthetics and Visual Quality

The visual impact of this alternative would be similar to the proposed project, as the homes would be located on large lots and native vegetation and landforms could be incorporated into the lots. The future homes would be more visible to motorists on SR 67 and Highland Valley Road, as there would be more homes located to the south of Highland Valley Road. Fewer homes would be located on the north side of Highland Valley Road, but the central ridgeline would be part of the residential lots and not preserved as open space, resulting in increased visual impacts. In comparison to the proposed project, which would have more open space and fewer lots located south of Highland Valley Road, the General Plan Update Alternative would have greater visual impacts.

Air Quality

This project would have a lower unit count and result in fewer air quality emissions because of reduced traffic generation. Grading would be somewhat reduced due to the reduction in the

number of lots, thus decreasing dust and other construction-related air emissions. Overall, the impacts resulting from this alternative would be generally less than the proposed project.

Global Climate Change

The General Plan Update Alterative would result in reduced short-term construction emissions due to the reduced number of lots. Emissions from vehicle trips and residential uses would be deceased due to the reduced unit count. However, in consideration of the overall cumulative nature of climate change, the slightly decreased emissions from the General Plan Update Alternative would not create a substantial difference relative to the proposed project. The cumulative climate change impact is considered to be similar for this alternative as compared to the proposed project.

Hydrology and Water Quality

The General Plan Update Alternative could result in a reduced amount of impervious surface due to the reduced number of homes as compared to the proposed project. Therefore, water quality impacts, such as runoff and sedimentation, would be considered reduced when compared to the proposed project. However, with larger lots, more accessory buildings and bare dirt could easily make the comparison more similar to the project.

Soils and Geology

This alternative would accommodate a lower unit count as compared to the proposed project. However, because this alternative is designed in a minimalist manner and would not mass grade the project site, the soils and geology impacts are considered similar to the proposed project.

Agricultural Resources

This alternative would have agricultural impacts similar to the proposed project, as the land uses for Areas A, B, and C would generally be the same. Agricultural activities would cease on Area A and be dependent on future management plans for Area B.

Land Use and Planning

The General Plan Update Alternative would include the same residential land uses as the proposed project and in the same general areas. The large lot sizes would accommodate large animal keeping, would be consistent with the Ramona Community Plan, and would meet the

rural character goal of the plan. Some unique features, such as the knolls and stands of trees, would be within lots on the south side of Highland Valley Road. The proposed lot sizes would be compatible with surrounding residential land uses. Therefore, this alternative would be similar when considering land use and planning as compared to the proposed project.

5.6.3 Rationale for Preference of Proposed Project Design over the General Plan Update Alternative

The General Plan Update Alternative would generally accomplish the goals and objectives of the proposed project. However, the loss of open space on the main ridgeline and the additional lots in the north may result in reduced connectivity to the grasslands and the ability of the alternative to meet the project objective to design a seamless integration of the development portion of the project with the surrounding open space. Although the large lot sizes is consistent with the Ramona Community Plan and typical development in the project area, the lots would encroach into the upland habitats of the main ridgeline in Area A and extend farther north than the proposed project. The loss of these unique features would be detrimental to both the visual quality of the project and biological function of the site. For these reasons, the proposed project is preferred over this alternative.

5.7 Summary of Project Alternatives and Comparative Impacts

This section provides a summary of the potential impacts that would result from implementation of each individual alternative considered in this evaluation in comparison to the impacts from the proposed project. Table S-2 on page S-28 is a matrix of the results of the comparison of the alternatives' impacts to the proposed project's impacts.

This EIR is required to identify the environmentally superior alternative among those alternatives considered. If the No Project Alternative is the environmentally superior alternative, the EIR must also identify an environmentally superior alternative among the other alternatives considered (Section 15126.6[e][2]).

As indicated in Table S-2, the No Project Alternative results in fewer impacts than the proposed project for most issue areas evaluated. However, because CEQA requires an alternative other than the No Project Alternative to be identified, the Reduced Project Alternative is considered to be the environmentally superior alternative. The Reduced Project Alternative is identified over the other project alternatives as the environmentally superior alternative because this alternative reduces the highest number of environmental impacts when compared to the proposed project (prior to implementation of mitigation measures identified in this EIR). The significant traffic

impact that would occur with the proposed project would be reduced with the smaller traffic volume associated with the Reduced Project Alternative. There would be no impact on sewer service, as all development could use septic systems and fewer residential units would generate less demand on existing community and public services. Noise impacts from roadways to the residential receptors would be avoided, and this would eliminate the potential need for noise barriers. This would reduce potential visual impacts from those barriers as compared to the proposed project. In addition, the reduced number of units would require less grading, would create less fugitive dust during construction, and would generate fewer emissions due to reduced vehicle trips. The Reduced Project Alternative would create potentially greater impacts related to cultural and biological resources due greater exposure to indirect effects, and also to hydrology and water quality due to the use of septic tanks and the potential encroachment into steep areas.

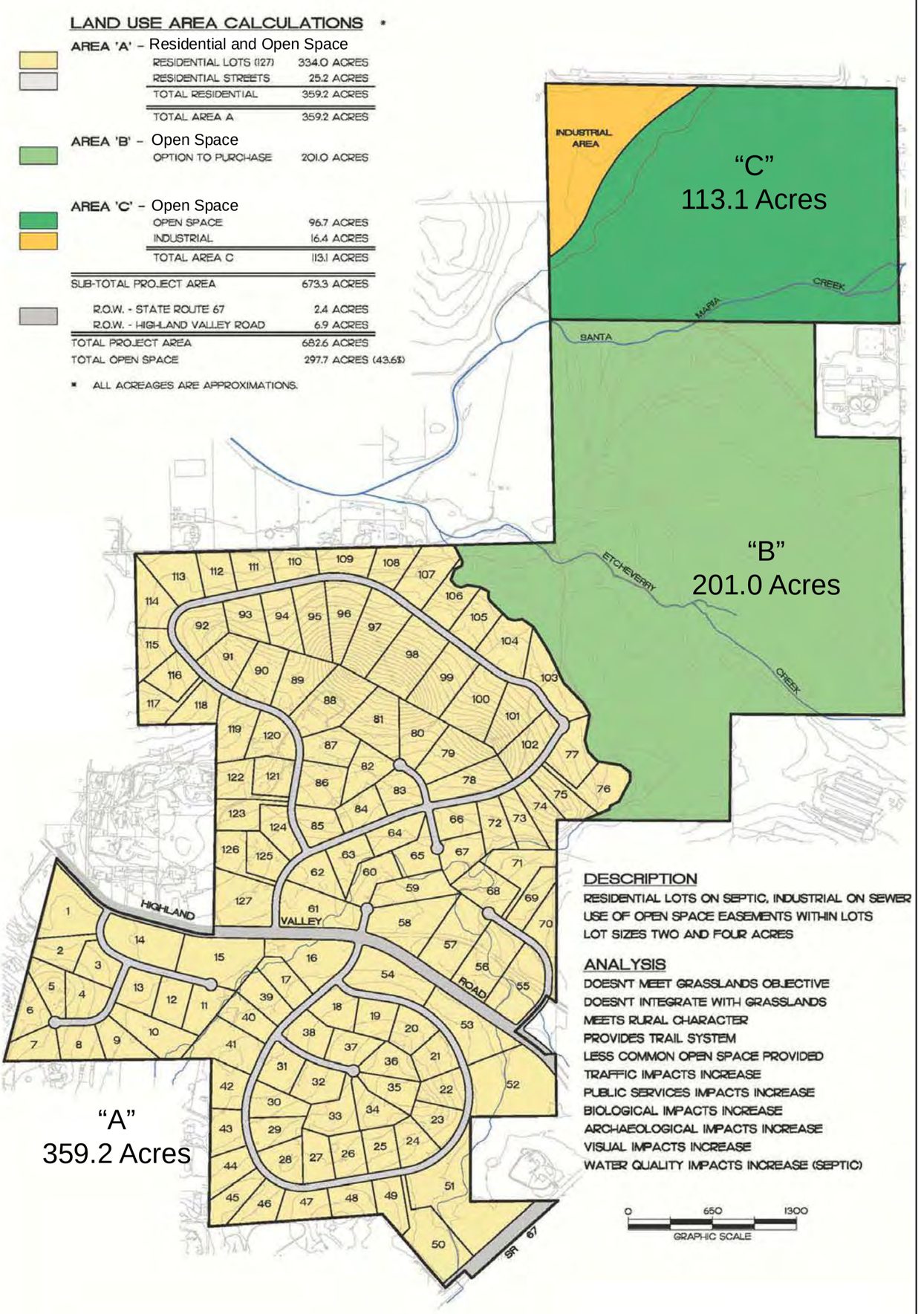

Figure 5-1
Existing Community Plan Alternative

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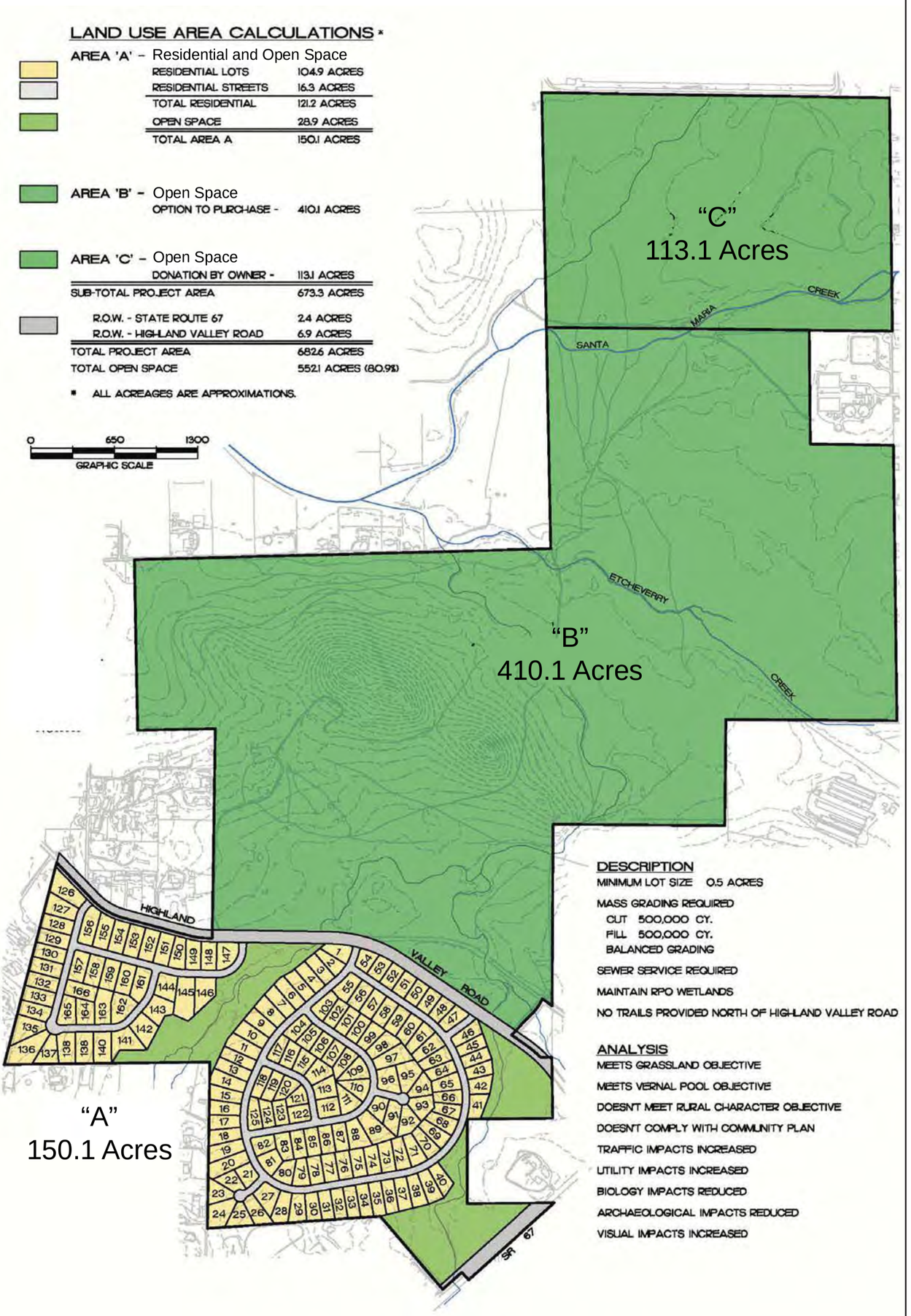

Figure 5-2
Clustered Development Alternative

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Figure 5-3
Reduced Project Alternative

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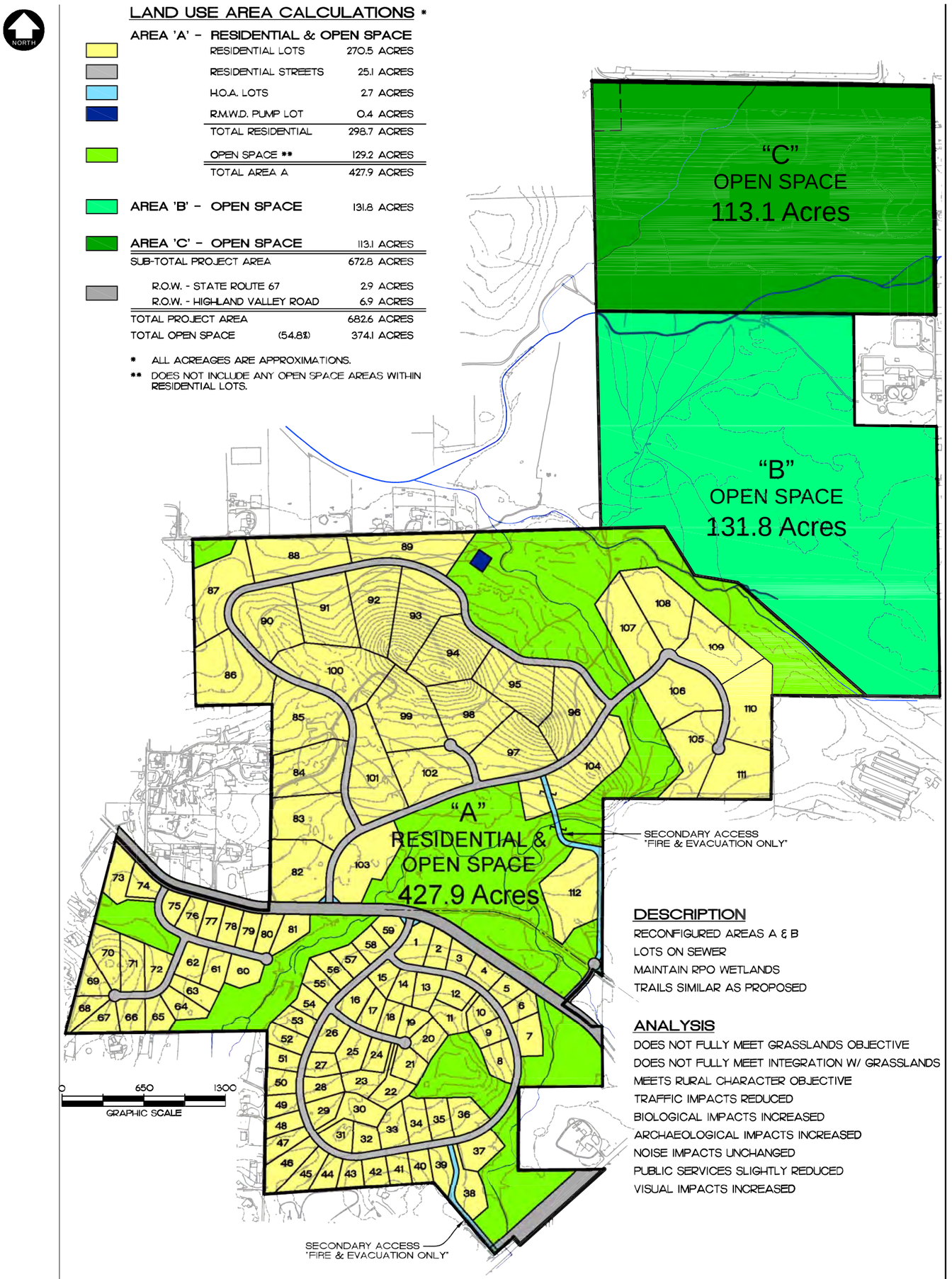

Figure 5-4
General Plan Update Alternative

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CHAPTER 6.0
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CHAPTER 7.0
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CHAPTER 8.0
LIST OF MITIGATION MEASURES AND ENVIRONMENTAL DESIGN CONSIDERATIONS

This chapter provides a comprehensive list in Table 8-1 of all mitigation measures included for the proposed project. Also provided in Table 8-1 is a list of project design measures that act to mitigate potentially significant impacts. See Chapter 1.0 for a complete description of all project design features, beyond those listed below, that have been incorporated into the Cumming Ranch project to develop the rural character and grasslands-based theme of the project, and to ensure that project objectives are met.

Table 8-1
Mitigation Measures and Project Features

Mitigation Measures
Mitigation Measure M-TR-1a: SR 67 - Scripps Poway Parkway to Archie Moore Road. This segment is currently a two-lane roadway with passing lanes at various locations. It currently operates at LOS F according to the County of San Diego's capacity standards for a two-lane highway. This segment will need widening to a four-lane facility for 5.1 miles to bring it to an acceptable level of service. Requiring the proposed project to construct these regional transportation improvements to this regional transportation facility, would not be proportional to the project's impact to the facility. Furthermore, a substantial portion, 3.3 miles, is in another jurisdiction, the City of Poway, and the County does not have jurisdiction to require the mitigation. Therefore, this mitigation would not be feasible. Even within the County jurisdiction, improvements are not feasible because they would require extensive conversion of existing land uses beyond the purview/ability of a private project and require regional highway improvements of a magnitude and scope disproportionate to the Applicant's development project. In addition, widening of smaller segments of the roadways would not alleviate the current "bottleneck" situation within these road segments because without widening the entire length of the segment currently operating at unacceptable levels, a "bottleneck" situation would persist. The resolution of the existing and projected inadequate service capacities along this regional arterial, which is designated a State Highway under Caltrans jurisdiction, must occur on a regional level. It should be noted that widening of Main Street (SR 67) from Highland Valley Road/Dye Road to Mapleview Street in Lakeside (a total of 15.3 miles) from two to four lanes is included in the Regional Transportation Improvement Plan (RTIP) as an engineering study. Because there are no reasonable improvements that this project can propose to increase the segment's capacity to acceptable levels, this segment will remain significant and unmitigated with project implementation.
Mitigation Measure M-TR-1b: Existing plus Project Conditions, SR 67 Street Segments, Archie Moore Road to Pala Street. The roadway improvements as part of the project shall be implemented prior to issuance of the first occupancy permit on the site to the satisfaction of the County DPW and shall also be implemented to Caltrans' satisfaction (the segment can be seen in Figure 2.1-1 and these improvements are illustrated in Figure 1-8 and described in Section 1.1.2) and include: a. Eastbound SR 67 – Widen eastbound SR 67 west of the Highland Valley Road intersection to provide two through-lanes and storage in each lane. Widen east of the Highland Valley Road intersection to provide two through-lanes for 400 feet and transition back to the existing roadway width within a 660-foot transition. b. Westbound SR 67 – Widen westbound SR 67 east of the Highland Valley Road intersection to provide two through-lanes with storage in each lane with the westbound right-turn lane retained. Widen west of the Highland Valley Road intersection to provide two through-lanes for 400 feet and transition back to the

Mitigation Measures
existing roadway width within a 660-foot transition. c. Highland Valley Road – Widen northbound Dye Road (Highland Valley Road) to provide duel left-turn lanes at the intersection. d. Traffic Signal – The traffic signal at the SR 67/Highland Valley Road intersection shall be modified to provide for the improvements described above. The construction of these improvements shall require additional ROW and the developer shall be responsible for funding the ROW acquisitions. In the event the developer is not able to acquire the necessary ROW from willing sellers during the final engineering process, the developer shall work with the County to acquire the ROW in accordance with County Board of Supervisors' Policy J-33.
Mitigation Measure M-TR-2a: Existing plus Project Conditions, SR 67 and Highland Valley Road Intersection. The direct impacts to the SR 67 and Highland Valley Road intersection shall be mitigated with the widening of SR 67 in the westbound direction to two lanes to accommodate morning peak traffic. This improvement is included in the overall intersection mitigation measures proposed under Mitigation Measure M-TR-1b for the SR 67 and Highland Valley Road intersection to mitigate roadway segment direct impacts.
Mitigation Measure M-TR-2b: Existing plus Project Conditions, SR 67 and Archie Moore Road. A signal warrant analysis shall be conducted at this intersection prior to approval of the final map. If signal warrants are met, the developer shall restripe the intersection and install a three-way traffic signal within the existing right of way, to the satisfaction of Caltrans and the County of San Diego. If warrants are met, installation of the traffic signal shall be required to be complete prior to occupancy of the first dwelling unit.
Mitigation Measure M-TR-3a: Cumulative Conditions, SR 67 - Scripps Poway Parkway to Archie Moore Road. Payment of TIF fees would partially mitigate the segment of SR 67 between Scripps Poway Parkway and Archie Moore Road. A portion of this segment is within the City of Poway. The cumulative impact at this segment is partially mitigated by payment of the County TIF for impacts within the jurisdictional boundaries of the County. To fully mitigate the impact at this segment, the mitigation would require additional travel lanes on the impacted portion of the segment within the jurisdictional limits of the City of Poway (between Poway Road and Cloudy Moon Drive), but this mitigation is not feasible and, therefore, is not proposed to address this impact. Because there are no reasonable improvements that this project can propose to increase the segment's capacity to acceptable levels, this segment would remain significant and unmitigated with project implementation.
Mitigation Measure M-TR-3b: Cumulative Conditions, SR 67 Segments in County Jurisdiction. To mitigate the project's contribution to cumulative impacts along the three remaining SR 67 segments (Impact TR-3b) the project applicant shall pay the appropriate TIF fees as determined by the County prior to issuance of the first occupancy permit on the site to the satisfaction of the County DPW.
Mitigation Measure M-TR-4: Cumulative Conditions, Dye Road Segments. To mitigate the project's contribution to cumulative impacts along Dye Road segments (Impact TR-4), the project applicant shall pay the appropriate TIF fees as determined by the County prior to issuance of the first occupancy permit on the site to the satisfaction of the County DPW.
Mitigation Measure M-TR-5: Cumulative Conditions, SR 67/Archie Moore Road Intersection. To mitigate the project's contribution to cumulative impacts at the SR 67/Archie Moore Road intersection (Impact TR-5), the project applicant shall pay the appropriate TIF fees as determined by the County prior to issuance of the first occupancy permit on the site to the satisfaction of the County DPW.
Mitigation Measure M-TR-6: Cumulative Conditions, SR 67/Scripps Poway Parkway Intersection. To fully mitigate the project's contribution to cumulative impacts at the SR 67/Scripps Poway Parkway intersection (Impact TR-6), the project applicant shall pay the appropriate TIF fees as determined by the County prior to issuance of the first occupancy permit on the site to the satisfaction of the County DPW.
Mitigation Measure M-TR-7: Cumulative Conditions, SR 67/Highland Valley Road Intersection. To mitigate the project's contribution to cumulative impacts at the SR 67/Highland Valley Road intersection (Impact TR-7), the project applicant shall construct the intersection improvements outlined in Mitigation Measure M-TR-1b prior to issuance of the first occupancy permit on the site to the satisfaction of the County DPW and Caltrans.
Mitigation Measure M-TR-8: Cumulative Conditions, SR 67/Montecito Road Intersection. To mitigate the project's contribution to cumulative impacts at the SR 67/Montecito Road intersection (Impact TR-8), the project applicant shall pay the appropriate TIF fees as determined by the County prior to issuance of the first occupancy permit on the site to the satisfaction of the County DPW.

Mitigation Measures
Mitigation Measure M-TR-9: Cumulative Conditions, SR 67/SR 78 Intersection. To mitigate the project's contribution to cumulative impacts at the SR 67/SR 78 intersection (Impact TR-9), the project applicant shall pay the appropriate TIF fees as determined by the County prior to issuance of the first occupancy permit on the site to the satisfaction of the County DPW.
Mitigation Measures BI-1 through M-BI-11: Impacts to Vegetation Communities. a. The primary mitigation acreage for the project would be located within Area A open space, with additional mitigation acreage located within Areas B and C. Open space lots A, B, C, D, E, F, and H in Area A were not included as mitigation acreage, as they are considered isolated and are impact neutral areas. Mitigation acreage shall be provided through the permanent dedication of open space land and the provision of an open space easement over this land according to the ratios provided in Table 3.1-5. The open space lots throughout Area A are shown on Figure 1-5 and open space easements are shown on Figure 1-16, Open Space Map. b. The RMP shall be approved and funded for the open space area and approved prior to the approval of a Final Map and any plan or permit for the project. The RMP provides for the monitoring and management of habitats and species such as oak tree replacement, habitat creation, species surveys and monitoring and other efforts involved in the day-to-day management of the open space area e.g., budget control and analysis, debris removal, exotic weed removal, general maintenance of any open space signage, etc.). The RMP includes performance standards to measure the success of mitigation (e.g., percent improvements over time, success rates, etc.), and shall include (1) construction monitoring of trails in the field as necessary to minimize impact from trail use; (2) wet condition installation of trail barriers crossing creeks; (3) trail repair (recommend and monitor installation of preventative bio-engineered erosion control devices, repair erosion damage, remove sediment); and (4) monitoring and management of the open space easements and coordination with the HOA to educate residents about the prohibitions and the resource sensitivity of the area. The monitoring and management of these lands shall be conducted in perpetuity.
Mitigation Measure M-BI-1: Direct Effects to Open Space Engelmann Oak Woodland. Impacts to 0.20 acre of open Engelmann oak woodland shall be mitigated through the in-kind preservation of existing Engelmann oak woodland onsite in Area A open space at a 3:1 ratio for a total of 0.60 acre (see Table 3.1-5). All necessary mitigation acreage is available on the project site.
Mitigation Measure M-BI-2: Direct Effects to Open Coast Live Oak Woodland. Impacts to 0.06 acre of open coast live oak woodland shall be mitigated through the preservation of existing Engelmann oak woodland onsite in Area A open space (including acreage preservation and RMP requirements as detailed in Mitigation Measure M-BI-1) at a 3:1 ratio for a total of 0.18 acre (see Table 3.1-5). All necessary mitigation acreage is available on the project site.
Mitigation Measure M-BI-3: Direct Effects to Southern Willow Scrub. Impacts to 0.05 acre of southern willow scrub shall be mitigated onsite in Area A open space (including acreage preservation and RMP requirements as detailed in Mitigation Measure M-BI-1) at a 3:1 ratio for a total of 0.15 acre (see Table 3.1-5). Of the 3:1 ratio, 1:1 shall include onsite restoration at impact locations where feasible. This shall entail the removal and stockpiling of topsoil during construction and then replacing it over the impact area after construction. The impact area shall be recontoured to preconstruction grade and the impact area shall be seeded with appropriate wetland plants. The remaining 2:1 ratio shall include onsite creation or restoration of wetland habitat or at a 3:1 ratio if the impact area cannot be restored. The Revegetation Plan shall detail the performance measures for creation and restoration (see Mitigation Measure M-BI-12).
Mitigation Measure M-BI-4: Direct Effects to Mulefat Scrub. Impacts to 0.05 acre of mulefat scrub shall be mitigated onsite in Area A open space (including acreage preservation and RMP requirements as detailed in Mitigation Measure M-BI-1) at a 3:1 ratio for a total of 0.15 acre (see Table 3.1-5). Of the 3:1 ratio, 1:1 shall include onsite restoration at impact locations where feasible. This shall entail the removal and stockpiling of topsoil during construction and then replacing it over the impact area after construction. The impact area shall be recontoured to preconstruction grade and the impact area shall be seeded with appropriate wetland plants. The remaining 2:1 ratio shall include onsite creation or restoration of wetland habitat or at a 3:1 ratio if the impact area cannot be restored. The Revegetation Plan shall detail the performance measures for creation and restoration (see Mitigation Measure M-BI-12).

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Mitigation Measure M-BI-5: Direct Effects to Cismontane Alkali Marsh. Impacts to 1.02 acres of cismontane alkali marsh shall be mitigated onsite in Area A open space (including acreage preservation and RMP requirements as detailed in Mitigation Measure M-BI-1) at a 3:1 ratio for a total of 3.06 acres (see Table 3.1-5). Of the 3:1 ratio, 1:1 shall include onsite restoration at impact locations where feasible. This shall entail the removal and stockpiling of topsoil during construction and then replacing it over the impact area after construction. The impact area shall be re-contoured to preconstruction grade and the impact area shall be seeded with appropriate wetland plants. The remaining 2:1 ratio shall include onsite creation or restoration of wetland habitat or at a 3:1 ratio if the impact area cannot be restored. The Revegetation Plan shall detail the performance measures for creation and restoration (see Mitigation Measure M-BI-12).
Mitigation Measure M-BI-6: Direct Effects to Nonvegetated Channel. Impacts to 0.03 acre of nonvegetated channel shall be mitigated onsite in Area A open space at a 3:1 ratio where the impact occurs (see Table 3.1-5) for a total of 0.09 acre. Creation and/or restoration mitigation shall occur where practicable onsite within Area A. The Revegetation Plan shall detail the performance measures for creation and restoration (see Mitigation Measure M-BI-12).
Mitigation Measure M-BI-7: Direct Effects to CSS. Impacts to 26.34 acres of CSS-inland form shall be mitigated through the preservation of existing CSS onsite in Areas A and B open space at a 2:1 ratio for a total of 52.68 acres of CSS (see Table 3.1-5). All necessary mitigation acreage is available on the project site.
Mitigation Measure M-BI-8: Direct Effects to Granitic Southern Mixed Chaparral. Impacts to 19.35 acres of granitic southern mixed chaparral shall be mitigated through the preservation of existing granitic southern mixed chaparral onsite in Area A open space (including acreage preservation and RMP requirements as detailed in Mitigation Measure M-BI-1). Mitigation shall be at a 0.5:1 ratio for a total of 9.68 acres (see Table 3.1-5). All necessary mitigation acreage is available on the project site.
Mitigation Measure M-BI-9: Direct Effects to Granitic Chamise Chaparral. Impacts to 4.05 acres of granitic chamise chaparral shall be mitigated through the preservation of existing granitic chamise chaparral onsite in Area A open space (including acreage preservation and RMP requirements as detailed in Mitigation Measure M-BI-1). Mitigation shall be at a 0.5:1 ratio for a total of 2.03 acres (see Table 3.1-5). All necessary mitigation acreage is available on the project site.
Mitigation Measure M-BI-10: Direct Effects to Nonnative Grassland. Impacts to 12.94 acres of nonnative grassland shall be mitigated through the preservation of existing nonnative grassland onsite in Areas A, B, and C open space (including acreage preservation and RMP requirements as detailed in Mitigation Measure M-BI-1). Mitigation shall be at a 1:1 ratio for a total of 12.94 acres (see Table 3.1-5). All necessary mitigation acreage is available on the project site.
Mitigation Measure M-BI-11: Direct Effects to Field/Pasture. Impacts to 164235 acres of field/pasture shall be mitigated through the preservation of existing nonnative grassland onsite in Areas A, B, and C open space (including acreage preservation and RMP requirements as detailed in Mitigation Measure M-BI-1). Mitigation shall be at a 0.5:1 ratio for a total of 82.68 acres (see Table 3.1-5 and Table 3.1-9). Impacts in Area B from the sewerline shall be at 1:1. All necessary mitigation acreage is available on the project site.
Mitigation Measure M-BI-12: Direct Effects to Wetlands and Waters of the U.S. a. On and offsite impacts to 0.13 acre of ACOE waters and wetlands shall be mitigated onsite in open space easements at a 3:1 ratio. Proposed mitigation for wetlands shall consist of a 3:1 ratio where 1:1 shall include onsite restoration at impact locations and 2:1 shall include onsite creation or restoration of habitat. Creation and/or restoration mitigation shall occur as detailed in a Revegetation Plan for 3.48 acres of riparian habitat/vegetation on the project site. The Conceptual Revegetation Plan is included in Appendix D. On and offsite impacts to 1.18 acres of CDFG wetlands and 1.18 acres of County RPO waters and wetlands shall be mitigated onsite in Area A open space at a 3:1 ratio. Proposed mitigation for wetlands shall consist of a 3:1 ratio where 1:1 will include onsite restoration at impact locations and 2:1 shall include onsite creation or restoration of habitat. Creation and/or restoration mitigation shall occur as detailed in the Revegetation Plan for 3.48 acres of riparian habitat/vegetation on the project site. Appropriate RPO wetland buffers shall be incorporated and shall be a minimum of 50 feet from the edge of the wetlands in accordance with the 2007 RPO. The plan shall also include establishment of 22 Engelmann and 8 coast live oak trees and the southern

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tarplant seed harvest and redistribution over 3.7 acres (Mitigation Measures M-BI-13 and 14). b. The Revegetation Plan will require approval by the appropriate agencies prior to issuance of grading permits for the project and details the performance measures for creation and restoration of wetlands and wetland habitats. The Revegetation Plan requires a bond be issued to the County to cover the full cost of the revegetation by the developer (to be released at the end of a successful monitoring period). Creation, restoration, and/or enhancement of wetland habitats shall occur throughout various sections of the unnamed drainages within the planned Area A open space area. In addition to a Revegetation Plan for 3.48 acres of riparian habitat/vegetation on the project site, the RMP developed for the open space area shall be approved and funded prior to the approval of a grading permit for the project (Mitigation Measures M-BI-1b through 11b). c. To address indirect impacts to RPO wetlands associated with maintenance activities, the RMP being prepared for this project shall require installation, inspection, and maintenance of appropriate best management practices (BMPs). d. For the future trail in Area B, a resurvey of the alignment prior to approval of the final map is proposed to determine if wetland impacts can be further minimized. Although the impacts for the trail in Area B have been evaluated and fully mitigated, the following has been applied to the project as a condition of approval: Prior to finalizing the alignment on the final map, a County-approved biologist and the project engineer would survey and may recommend adjusting the trail and sewer alignment (20-feet wide) in Area B to deviate not more than 100 feet south of the approved location on the tentative map. Changes to the alignment must reduce biological impacts by moving the trail away from alkali marsh to agricultural land or by increasing the width of the wetland buffer along Santa Maria Creek. The survey and alignment recommendations shall be done prior to approval of the final map and be reviewed and approved by DPLU (sewer) and DPR (trails). The applicant is only responsible for granting an easement for the trail in Area B because this trail would be constructed in the future by DPR in coordination with the Ramona Grasslands Preserve Public Access Plan. The applicant is responsible for construction of trails in Area A and Hardy Ranch. During construction of the trails, the Resource Manager under the RMP may make minor adjustments within the 20-foot wide alignment to further minimize impacts from trail use. e. Prior to approval of a grading plan, evidence of applicable permits (or verification that permits are not required) shall be provided to the County. f. During wet conditions, the Resource Manager will evaluate creek crossings and may restrict their use with barriers when water flow is an issue for user safety or trail stability or there is a potential for trail damage. The Resource Manager will recommend and oversee installation of preventive bioengineered erosion control devices (such as vegetated swales and permeable pavers), repair erosion damage, and remove sediment from trail crossings as necessary.
Mitigation Measure M-BI-13: Direct Effects to Individual Oaks. Direct impacts to Engelmann oaks and coast live oaks shall be mitigated at a 2:1 replacement ratio. The replacement of 22 Engelmann oak and 8 coast live oak trees shall occur within Area A open space lots. A Revegetation Plan with monitoring and success criteria has been prepared and shall be submitted for resource agency approval. The success of these trees shall be monitored for no less than 3 years in accordance with all Revegetation Plan requirements (Mitigation Measure M-BI-12a).
Mitigation Measure M-BI-14: Direct Effects to Southern Tarplant. a. Impacts to 3.7 acres of southern tarplant shall be mitigated with preservation and management of approximately 21 acres of the onsite population within Areas A and B open space. b. In addition, the Revegetation Plan shall be implemented to provide for an expansion of the population on 3.7 acres of suitable habitat in the managed open space. The Revegetation Plan shall include provisions for seed to be harvested from impact areas and distributed on approximately 3.7 acres onsite adjacent to areas known to support the species. The Revegetation Plan shall also include measures for the southern tarplant that will be directly affected by sewer line installation (0.2 acre), to be implemented to retain the topsoil and return it to the same location to allow for regrowth of this species.
Mitigation Measure M-BI-15: Direct Effects to Sensitive Animals. a. Direct impacts to sensitive herpetofaunal species habitat shall be mitigated with preservation of habitat

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onsite within Area A and Area B open space lots for western spadefoot toad; arroyo toad; San Diego horned lizard; granite spiny lizard; granite night lizard; coastal California whiptail; and orange-throated whiptail as required under Mitigation Measures M-BI-1 through M-BI-12. To minimize potential impacts specific to arroyo toad, the following measure shall be implemented: Prior to any grading, an arroyo toad biologist shall examine the impact areas to determine if any portions of the site have suitable habitat for occupation by arroyo toad. Upon agreement with USFWS, a protocol survey may or may not be required. If surveys determine that there are no arroyo toads present, no further action is necessary. If it is determined that arroyo toads are present, then a FESA take permit shall be obtained. Permit conditions would include monitoring and species avoidance measures during construction, and may include dedication of open space easements over suitable habitat in Area B, open space habitat enhancements, and/or endowment for conservation as a condition of the FESA take permit. b. Direct impacts to sensitive mammalian species habitat shall be mitigated onsite within Area A open space lots for mountain lion; American badger; San Diego desert woodrat; San Diego black-tailed jackrabbit; and southern mule deer, as required under Mitigation Measures M-BI-1 through M-BI-12. Prior to any grading, a qualified biologist shall examine the impact areas to determine if any portions of the site have suitable habitat for occupation by Stephens' kangaroo rat. Upon agreement with USFWS, a protocol survey may or may not be required. If surveys determine that there are no Stephens' kangaroo rat present, no further action shall be necessary. If it is determined that Stephens' kangaroo rat are present, then an Endangered Species Take Permit shall be obtained. Permit conditions would include monitoring and species avoidance measures during construction, mitigation credits over suitable habitat in Area B, open space habitat enhancements, and/or endowment for conservation, at a 2:1 occupied habitat ratio, as a condition of the FESA take permit. c. Direct impacts to sensitive avian species habitat shall be mitigated onsite within Area A open space lots for Canada goose; turkey vulture; white-tailed kite; northern harrier; golden eagle; Cooper's hawk; red-shouldered hawk; ferruginous hawk; loggerhead shrike; great horned owl; burrowing owl; zone-tailed hawk; red-tail hawk; rough-legged hawk; American kestrel; and barn owl, as required under Mitigation Measures M-BI-1 through M-BI-12. d. To avoid potential construction impacts specific to burrowing owls, tree nesting raptors, California gnatcatchers, and migratory songbirds for the final map shall require: (1) During the breeding season, February 1 through August 31, no brushing, clearing, and/or grading shall be allowed. The Director of DPLU may waive this condition, provided there are no active owl burrows within 800 feet of the brushing, clearing, or grading, as determined by take avoidance (preconstruction) surveys conducted from 14 days to within 24 hours before the initial brushing, clearing, and grading and ongoing weekly burrowing owl monitoring surveys (according to County or CDFG protocols). After young owls have fledged, or from September 1 through January 31, protocol preconstruction surveys and weekly monitoring throughout grading operations shall be conducted to determine if owls are present in the burrows. If present, a qualified biologist shall implement passive relocation measures in accordance with CDFG Staff Report (2012) and wildlife agency concurrence. If no owls are present grading activities may continue with weekly burrowing owl monitoring surveys to ensure that no new burrows are occupied. (2) All brushing, clearing, and/or grading shall be restricted such that no grading or clearing will be allowed within 500 feet of tree-nesting raptors in the project area. The developer shall have raptor nest surveys conducted prior to tree cutting or grading near mature trees to ensure that active nests are not present. A qualified biologist shall conduct the surveys between January 15 and August 31 and prepare a survey report. If no raptor nests are discovered in the trees to be removed, no further mitigation shall be required. If any active raptor nests are discovered, the biologist shall mark all occupied trees and delineate a 500-foot buffer area around each occupied tree. No construction activity shall occur within the 500-foot buffer until the young have fledged, as determined by a qualified biologist. (3) All brushing, clearing, and/or grading shall be restricted such that no grading or clearing shall be allowed within 300 feet of occupied coastal sage scrub during the avian breeding season (January 15 through August 31) This measure may be waived if pre-grading surveys show that no gnatcatchers are

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present in or within 300 feet of the area to be brushed, cleared, or graded. (4) All brushing, clearing, and/or grading shall be restricted such that no grading or clearing shall be allowed to "take" any active migratory bird nest during the breeding season (January 15 through August 31). This measure may be waived if pre-grading surveys show that there are no active migratory bird nests in the area to be brushed, cleared, or graded. If construction is halted for a period of fourteen days or more during the avian nesting season, a biological survey of the habitat within 500 feet of proposed construction sites shall be required prior to restarting construction. The above measures shall be noted on all grading and improvement plans.
Mitigation Measure M-BI-16: Indirect Effects of Project Construction. The following resource protection measures shall be implemented by the developer to ensure that indirect impacts to sensitive vegetation communities and sensitive plants do not occur: a. A County approved biologist shall perform monitoring duties before, during, and after construction to ensure against damage to biological resources that are intended to be protected and preserved. The monitor shall be onsite during all grading and clearing activities that are in or adjacent to any biological open space areas or sensitive habitats. If there are disturbances, the monitor must report them immediately to the DPLU Permit Compliance Coordinator. Additionally, the biologist shall monitor fencing and erosion control measures, monitor equipment maintenance, staging, and fuel dispensing areas, stop or divert work when deficiencies require mediation, and attend construction meetings. When all grading activities have been completed, the biologist shall prepare and submit a final letter report. b. Prior to commencement of construction, the limits of each phase of project construction shall be clearly delineated with temporary fencing by a survey crew. Onsite, the temporary fencing shall be required when grading is proposed within 100 feet of open space. Offsite, temporary fencing shall be installed to indicate the allowable limits of grading, clearing, and staging areas. The limits shall be checked by the biological monitor before initiation of clearing or construction. The project biologist shall submit a letter to the County indicating that the limits of construction have been checked and work can commence. c. Activities, including staging areas, equipment access, and disposal or temporary placement of excess fill, shall be prohibited within drainages, sensitive habitats, or sensitive plant populations outside of the identified construction area. d. Erosion and siltation into offsite areas during construction shall be minimized through the implementation of an erosion control plan. The contractor shall prepare an erosion control plan for approval by the County. The contract supervisor shall be responsible for ensuring that the erosion control plan is developed and implemented. e. Construction access shall utilize existing developed areas or be within the identified construction area. Contractors shall clearly mark all access routes (i.e., flagged and/or staked) prior to the onset of construction. f. To avoid sensitive habitats, construction staging areas, equipment refueling areas, and other areas for equipment and materials storage shall be located within the identified construction area. To avoid inadvertent impacts to sensitive biological resources that may be present, storage and access areas shall be displayed on the approved project plans and specifications. g. Biological monitoring shall be required where impacts occur in proximity to proposed open space and other sensitive habitats and resources as determined by the project biologist. h. Biological monitoring shall be required along the alignment of the on and offsite infrastructure construction. i. For the future trail in Area B, a resurvey of the alignment prior to approval of the final map is proposed to determine if wetland impacts can be further minimized. Although the impacts for the trail in Area B have been evaluated and fully mitigated, the following has been applied to the project as a condition of approval:

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Prior to finalizing the alignment on the final map, a County-approved biologist and the project engineer would survey and may recommend adjusting the trail and sewer alignment (20-feet wide) in Area B to deviate not more than 100 feet south of the approved location on the tentative map. Changes to the alignment must reduce biological impacts by moving the trail away from alkali marsh to agricultural land or by increasing the width of the wetland buffer along Santa Maria Creek. The survey and alignment recommendations shall be done prior to approval of the final map and be reviewed and approved by DPLU (sewer) and DPR (trails). The applicant is only responsible for granting an easement for the trail in Area B because this trail would be constructed in the future by DPR in coordination with the Ramona Grasslands Preserve Public Access Plan. The applicant is responsible for construction of trails in Area A and Hardy Ranch. During construction of the trails, the Resource Manager under the RMP may make minor adjustments within the 20-foot wide alignment to further minimize impacts from trail use.

The above measures shall be noted on all grading and improvement plans.

Mitigation Measure M-BI-17: Indirect Effects of Project Occupation.

a. The dedicated LBZ easements on each lot shall prohibit: (1) animal keeping without effective restraints or fencing, (2) lighting, (3) exotic invasive landscaping, (4) focal use areas including arenas, pools, and patios, and (5) all structures, unless written verification is obtained from the County Fire Marshal that states the structure will not require fuel modification to extend into biological open space. The LBZ easements shall require large animals to be kept within fences.

b. Open space signage, in accordance with County policy, shall be installed prior to grading activities and shall be maintained and replaced as needed under provisions within the RMP. Signs shall be located every 50 feet along all open space edges in conjunction with the residential lot LBZ and where open space is adjacent to internal streets, pathways and trails. The signage shall have the following language or similar on it:

"Sensitive Environmental Resources
Area Restricted by Easement
Entry without express written permission from the County of San Diego
is prohibited. To report a violation or for more information about easement
restrictions and exceptions, contact the County of San Diego,
Department of Planning and Land Use
Ref: *(3810-03-005)*"

Upon completion of the installation of the open space signage, the project engineer shall submit a signed statement to the County indicating that all signs are in place.

c. The RMP Resource Manager shall monitor and manage the open space easements, and work with the HOA to educate residents and trail users about the prohibitions and the resource sensitivity of the area.

Mitigation Measure M-CR-1: All-Ground Disturbing Activities.

a. A cultural resources monitoring program shall be implemented as summarized here and detailed in the Cultural Resources Report.

The monitoring program shall include the observation of all grading by one or more Native American monitors and by an archaeological monitor or monitors (depending on the scale of grading going on at any one time). A preconstruction meeting to clarify procedures shall be held prior to the start of ground-disturbing activities.

b. If cultural resources are identified during ground-disturbing activities, the following procedures shall be implemented:

1. Isolated artifacts and minor (non-significant) deposits shall be documented in the field, allowing grading to proceed.

2. Any potentially significant deposits or artifact concentrations shall be evaluated and the County Archaeologist shall be notified. A Research Design and Data Recovery Plan shall then be developed for any significant deposits and implemented. Grading in the vicinity of the deposits shall cease until the Data Recovery Plan is implemented to the satisfaction of the County Archaeologist. Standard

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County Procedures shall be followed in the case that human remains are inadvertently discovered. Material collected during the monitoring program shall be cataloged and analyzed and a report shall be prepared. This report shall address any data recovery that might be required during monitoring, as well as isolated artifacts found during the grading. Artifacts shall be curated at a qualified institution.
Mitigation Measure M-CR-2: Significant Cultural Resource Site CA-SDi-17,171. a. All ground-disturbing activities shall be monitored as described in Mitigation Measure M-CR-1. b. Prior to the start of construction, temporary fencing shall be placed around the known significant portions of this site and shall remain in place until grading is complete to avoid inadvertent disturbance of the significant portion of the site. c. A permanent fence shall be constructed between the road and the site. This shall be a rustic fence to blend with the nature of the proposed development and match fencing used in other areas of the development. d. Signs shall identify this as a sensitive area that is being preserved, but they shall not mention cultural resources or archaeological site. e. Site CA-SDi-17,171 shall be placed in an open space easement granted to the County of San Diego. f. The open space easement shall be managed in accordance with the RMP required for this project (the Conceptual Resource Management Plan is provided in Appendix C). Measures specific to management of cultural resources include: 1. A qualified Resource Manager, approved by the Director of Planning and Land Use and/or the County of San Diego Department of Parks and Recreation, shall take responsibility for the management of the open space lots. 2. At the time the Resource Manager assumes responsibility for the management of the lots, or just prior to this event, the condition of the sites in question shall be documented. This shall consist of establishment of permanent photography stations (either marked by permanent markers or by the designation of a recognizable and relocatable natural feature such as a rock). These shall be identified on a map of the site. A series of panoramic photographs shall be taken from each photography station to record the condition of the site. Any disturbance or other pertinent conditions shall be photographed, as well, and noted on the site map. A copy of this base-line information shall be filed at the South Coastal Information Center. 3. Each year thereafter, a site visit shall be made by a qualified archaeologist and a Native American Monitor. They shall check the condition of the site against the baseline data recorded in step 2. They shall note any problems and differences between the conditions as they exist on the ground and the conditions described in the baseline documentation. Reports of these visits shall be filed at the South Coastal Information Center. 4. If damage is noted to the archaeological sites, the archaeologist and Native American Monitor shall develop recommendations for preventing further damage. Such measures might include increased patrols, selected capping of site areas, posting of signs, or the formation of a neighborhood watch to monitor the sites and to report vandals.
Mitigation Measure M-CR-3: Significant Cultural Resource Site CA-SDi-17,177. a. All ground-disturbing activities shall be monitored as described in Mitigation Measure M-CR-1. b. Prior to the start of construction, temporary fencing shall be placed around the known significant portions of this site and shall remain in place until grading is complete to avoid inadvertent disturbance of the significant portion of the site. c. A permanent fence and signage shall be constructed between the road and the site, as described in Mitigation Measure M-CR-2. d. Site CA-SDi-17,177 shall be placed in an open space easement granted to the County of San Diego. e. The open space easement shall be managed in accordance with the RMP required for this project and shall include the management requirements outlined in Mitigation Measure M-CR-2.

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Mitigation Measure M-CR-4: Significant Cultural Resource Site CA-SDi-17,178.

a. The mitigation of impacts to CA-SDi-17,178 shall be through data recovery (refer to Cultural Resource Evaluation). A research design has been prepared for this project and is included in the Cultural Report which outlines data recovery mitigation for the proposed destruction of a portion of the archaeological site CA-SDi-17,178. The research design, subject to approval by the County shall include, but is not limited to the following performance standards:

   1. All data recovery shall include a Native American monitor. The presence of a Native American monitor shall be required for the duration of the excavation portion of the project.

   2. Phase 1 data recovery shall include mechanical trenching (optional) and a 5-15% hand-excavated sample of the subsurface artifact concentrations for CA-SDi-17,178. During excavation, attention shall be given to the need for special studies such as pollen analysis, flotation samples, botanical analysis, and protein residue analysis. If so, appropriate samples shall be taken and processed. Attention shall be given to collecting, documenting, and processing material for radiocarbon dating and obsidian source and hydration analysis. Material recovered from these excavations shall be cataloged and analyzed using standard procedures. All artifacts collected in the data recovery or in any other phase of this project shall be curated at a facility acceptable to the County of San Diego.

   3. At the completion of Phase 1, a letter report shall be submitted to the Director of the Department of Planning and Land Use. The letter report shall evaluate the issues of site integrity, data redundancy, spatial and temporal patterning, features, and other relevant topics to assess the adequacy of the initial (2.5% is typical) percent sample. Based on this assessment, the letter report shall recommend the need for and scope of a second phase of field investigations, not to exceed a total site hand excavated sample (5% is typical) of the subsurface artifact concentration.

   4. Implement Phase 2 of fieldwork, as necessary.

   5. Conduct artifact analysis, including lithics analysis, ceramics analysis, faunal analysis, floral analysis, assemblage analysis, and radiocarbon dating, as detailed in Appendix 6 of the archaeological extended study, "*Cultural Resources Evaluation of Cumming Ranch"* (Gross 2004, 2010).

b. Prior to recordation of the Final Map the applicant shall:

   1. Complete and submit the Final Technical Report from the principal investigator to the satisfaction of the Director of Planning and Land Use.

   2. Provide evidence to the satisfaction of the Director of Planning and Land Use that all archaeological materials recovered during both the significance testing and data recovery phases have been curated at a San Diego facility that meets standards per 36 CFR 79, and, therefore, would be professionally curated and made available to other archaeologists/researchers for further study. The collections and associated records shall be transferred, including title, to an appropriate curation facility within San Diego County, to be accompanied by payment of fees necessary for permanent curation. Evidence shall be in the form of a letter from the curation facility identifying that archaeological materials have been received and that all fees have been paid.

Mitigation Measure M-CR-5: Significant Cultural Resource Site CA-SDi-17,186.

a. All ground-disturbing activities would be monitored as described in Mitigation Measure M-CR-1.

b. Prior to the start of construction, temporary fencing shall be placed around the known significant portions of this site and shall remain in place until grading is complete to avoid inadvertent disturbance of the significant portion of the site.

c. A permanent fence and signage shall be constructed between the road and the site, as described in Mitigation Measure M-CR-2.

d. Site CA-SDi-17,186 shall be placed in an open space easement granted to the County of San Diego. The open space easement shall be managed in accordance with the RMP required for this project, and shall

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include the management requirements outlined in Mitigation Measure M-CR-2.
Mitigation Measure M-N-1: Construction Noise – Offsite Receptors. During construction of the internal street system south of Highland Valley Road, a 14-foot-high inversed "L"-shaped temporary noise barrier 420 feet in length shall be constructed along the project boundary as shown in Figure 3.3-6.
Mitigation Measure M-N-2: Construction Noise – Onsite Receptors. When construction sites are located within 75 feet of an occupied residential property line, temporary noise barriers, with a minimum height of 8 feet, shall be required to block the line-of-sight from the occupied residence to the active construction site.
Mitigation Measure M-N-3: Rock Breaking and Material Handling. When rock breaking activities are located within 125 feet of an occupied residential property line, temporary noise barriers with a minimum height of 8 feet shall be required. The temporary barriers shall be constructed no more than 5 feet from the point of impact and to block the line of sight from the active rock breaking/material handling site to the occupied residence. The proposed barrier shall provide an approximately 18 dBA reduction from impact noise associated with rock breaking, which would reduce potential construction noise levels at future residential property lines to 73 dBA L_{eq}.
Mitigation Measure M-N-4: Noise-Sensitive Avian Habitat. The following measures shall be required to reduce the short-duration impact of construction-related noise on sensitive avian habitat: a. Where feasible, the project shall avoid construction within 500 feet of habitat for noise sensitive species, between January 15 through September 15. b. If the preconstruction biological surveys required under Impact BI-15 determine nests of noise-sensitive avians are present in the habitat, or construction noise would have a significant impact on the species using the habitat, an acoustical study shall be prepared to assess noise sources, determine noise levels in the habitat, and determine mitigation measures capable of reducing noise levels to 60 dBA L_{eq} or less. If noise levels from construction cannot be reduced below 60 dBA L_{eq}, construction shall not be allowed January 15 through September 15.
Mitigation Measure M-N-5: Traffic Noise Levels and Land Use Compatibility. Due to the potential conflicts with the proposed land uses and predicted future noise levels along Highland Valley Road and SR 67, the following measures shall be required to reduce potential traffic noise impacts to a less than significant level and to ensure that the proposed project complies with the County's noise standards. As detailed in the Noise Analysis for the project, conceptual feasibility analysis modeling was completed and found that all lots could obtain an area of reasonable size to allow for exterior residential use below the 60 dBA CNEL threshold. a. Prior to approval of the Final Map, in accordance with the San Diego General Plan Noise Element, the applicant shall dedicate to the County of San Diego "noise restriction easements" on each of Lots 5 through 11, Lots 55 through 57, Lots 70 through 77, and Lots 98 and 99, over the area of the property from the lot line at the edge of Highland Valley Road to a line 300 feet from the centerline of Highland Valley Road. These easements shall be for the protection of NSLUs from traffic noise. The noise restriction easements shall be shown on the Final Map. Prior to approval of the Final Map, in accordance with the San Diego General Plan Noise Element, the applicant shall dedicate to the County of San Diego "noise restriction easements" on each of Lots 39 through 41, from the lot line at the edge of SR 67 to a line 795 feet from the centerline of SR 67. These easements shall be for the protection of NSLUs from traffic noise. The noise restriction easements shall be shown on the Final Map. These noise restriction easements shall require that, prior to the issuance of a Building Permit for residences located within the noise restriction easement, evidence shall be provided to the satisfaction of the Planning Director that exterior (outdoor) noise levels comply with the applicable NSLU noise level limits and land use compatibility guidelines of the County. The NSLU area does not include the entire lot but includes an area of reasonable size that adjoins the home to allow exterior use by single-family residents at noise levels of 60 dBA CNEL or below. If noise barriers are required for compliance with the noise easement, barriers could be made of masonry, wood, and transparent materials, such as glass or Lucite. Earthen berms or a combination of berms and walls would also provide noise attenuation. The noise restriction easement language shall contain a restriction stating that the structure and the exterior living area shall be placed such that a noise barrier will complement the residences architecture and will not

Mitigation Measures
incorporate a solid (opaque) wall in excess of six feet. Conceptual modeling was prepared and is provided in the noise study (Appendix F) to show feasibility of noise reduction for each impacted lot. The conceptual noise barrier locations are shown on Figure 3.3-7. b. Noise barriers, as described above, would not reduce noise levels at second story elevations. Where two-story homes would be built in the area of properties where future noise levels, without abatement, are forecast to approach or exceed 60 dBA, the Building Permit applicant shall demonstrate that interior noise levels due to exterior noise sources would not exceed 45 dBA. Compliance shall require the submittal of a report with the building plans identifying the noise attenuation features included in the project's design to maintain interior noise levels at or below 45 dBA. In these cases, it is anticipated that the typical method of compliance would be to provide the homes with air conditioning or equivalent forced air circulation to allow occupancy with closed windows which, for most residential construction, would provide sufficient exterior-to-interior noise reduction.
Mitigation Measure M-N-6: Stationary Noise Sources – Lift Station. Prior to the issuance of improvement plans or grading permits for the TM, the project applicant shall demonstrate that the sewer lift station noise will comply with the County Noise Ordinance (Section 36.404). To verify noise compliance, a Minor Use Permit or Site Plan shall be required to verify ongoing compliance. As part of the Minor Use Permit, the applicant shall develop and submit site plans for the lift station and proposed enclosure and a noise study, demonstrating the lift station's compliance with the County Noise Ordinance, Section 36.404 regulations of 50 dBA L_{eq} during daytime hours (and 45 dBA during nighttime hours) at the lot line, and provide any necessary abatement measures to achieve this noise level. Abatement measures required to reduce noise levels may require complete enclosure of the equipment, specific orientation of the noise-generating equipment, noise barriers, or berms. Specifications and recommendations from this study shall be incorporated into the final site plans to the satisfaction of the Director of the Department of Planning and Land Use.
Mitigation Measure M-AE-1: Visual Appearance of Noise Barriers. The Noise Restriction Easement shall require that the overall look of the required noise barriers at each of the 22 noise-impacted residences adhere to the following design measures to ensure that the noise barriers complement the natural setting and overall design of the Cumming Ranch project and surrounding community character. Measures include: a. Barriers shall be constructed of natural-looking materials that complement the surrounding rural landscape. Materials such as stone, stone veneer, boulders, and stucco are all acceptable materials. b. The use of plexi-glass or other translucent materials shall be allowed. c. The color palette for the barriers shall be consistent with the adjacent rural landscape and consist of earth-toned hues. d. A minimum of a 5-foot-wide landscape buffer shall be required along the exterior base of barriers. All landscape material in this area shall be native and as defined in the Landscape Concept Plan. e. Earth berms or earth berm/wall combination are other acceptable forms of noise mitigation. Berms shall have a maximum of 1.5:1 slope. If a berm is used, it shall be natural in appearance and reflect the aesthetic of the surrounding rural landscape. Berm plantings shall be consistent with the Landscape Concept Plan. f. Wall portion of the barriers shall not exceed 6 feet. The use of natural materials on the wall facades to complement the open rural setting would reduce the intrusiveness of the walls and unite the walls with the overall design of the proposed project. Landscaping along the exterior base of the walls would partially conceal the walls as well as blend the hard lines of the walls with the open surroundings. The use of plexi-glass or other transparent material would reduce the visibility of the walls, while still maintaining the appropriate noise reduction. These measures shall be imposed upon the project by the Noise Restriction Easement.
Mitigation Measure M-CC-1: Reduce Project-Generated GHG Emissions Contributing to Climate Change. <u>Construction-Generated Emissions</u> – To be required on the grading and improvement plans: The grading and improvement plans shall specify that the contractor shall: a. Maintain construction equipment in good working order per the manufacturer's specifications.

Mitigation Measures
b. Limit idling time for construction equipment and vehicles to five minutes. Operational Emissions – The Site Plan shall require the project developer implement the following mitigation measures or other equivalent measures consistent with OPR guidance to meet the specified performance criteria deemed feasible by the County to reduce GHG emissions. c. Meet California Green Building Code standards for energy efficiency in all new residential units. Examples of these standards include use of Energy Star equipment, water-conserving plumbing fixtures, use of regional materials, and products with recycled content, etc. d. Generate a minimum of 10% of the project's energy consumption from onsite renewable energy-generation sources (e.g., photovoltaic cells or other onsite energy generating technology). For example, the estimated roof size of the photovoltaic system required to generate 10% of the project's energy would be approximately 4,405 square feet. e. Reduce outdoor water consumption by a minimum of 50% (e.g., rainwater collection systems). f. Install solar water heaters in all proposed units.
Mitigation Measure M-PS-1: Fire Protection Service. The Cumming Ranch project shall participate in a Community Facilities District as required by the Ramona Fire Prevention Bureau. The project developer shall be required to pay all fees and meet all requirements of the Community Facilities District to the satisfaction of RMWD.
Mitigation Measure M-PS-2: Water Conveyance, Storage, and Treatment. County approval of the Final Map for the Cumming Ranch project or permits that allow for ground disturbance shall not occur until after RMWD has provided a commitment of water supply to serve the project. The project developer shall be required to pay all service fees as determined by RMWD.
Mitigation Measure M-PS-3: Sewer Service and Treatment. County approval of the Final Map for the Cumming Ranch project or permits that allow for ground disturbance shall not occur until after RMWD has provided a commitment of wastewater treatment capacity to serve the project. The project developer shall be required to pay all service fees as determined by RMWD.
Mitigation Measure M-PS-4: Cumulative Fire Protection Service. The Cumming Ranch project shall participate in a Community Facilities District as required by the Ramona Fire Prevention Bureau. The project developer shall be required to pay all fees and meet all requirements of the Community Facilities District to the satisfaction of RMWD.
Mitigation Measure M-PS-5: Cumulative Water Conveyance, Storage, and Treatment. County approval of the Final Map for the Cumming Ranch project or permits that allow for ground disturbance shall not occur until after RMWD has provided a commitment of adequate water supply to serve the project. The project developer shall be required to pay all service fees as determined by RMWD.
Mitigation Measure M-PS-6: Cumulative Sewer Service and Treatment. County approval of the Final Map for the Cumming Ranch project or permits that allow for ground disturbance shall not occur until after RMWD has provided a commitment of adequate wastewater treatment capacity to serve the project. The project developer shall be required to pay all service fees as determined by RMWD.
Project Design Features
Residential lots would be sized to be compatible with existing surrounding residential development.
Pads would be designed to "fit-in" to the terrain, minimizing stair stepping of pads and retaining natural forms that complement natural landforms. Overall grading is expected to be less than 65% of typical grading operations where mass grading techniques are used.
The project's network of open space (457.8 acres equaling 67% of the total site) is intended to be consistent with the intent of the Ramona Grasslands Preserve and preserve the majority of the sensitive habitats, wildlife corridors, landforms, and drainages onsite.
Unique or interesting natural resources, such as biological resources, rock outcroppings, heavily wooded areas, or swales and streams, would be preserved within open space areas.
All of the major ridgelines would be preserved within open space areas.
Natural features, such as rock outcroppings and trees, have been incorporated into the individual lot designs.
A community-level trail network has been incorporated into the project design. Trails would extend from Hardy Ranch and into Area A, eventually connecting to Highland Valley Road. Another trail would provide connectivity along the east side of the project. The community trails would be expected to interconnect and become part of a

Project Design Features
future regional trail system. Natural-colored decomposed granite would be installed in high use areas and compacted native material on the majority of the trail. The proposed alignments of the trails as part of the Cumming Ranch project are very similar to the location of the trails on the Trails and Pathways for Ramona map.
Pathways would be provided along one side of all internal streets. The pathways would not be paved but would be covered with decomposed granite or a similar material to maintain a rural and informal setting. A community pathway would also be provided along the north side of Highland Valley Road, beginning at the westernmost entrance to the project site and continuing east to the intersection with SR 67.
Because the project would not be mass graded and contoured for complete gravity flow, the sewer lines have been located in low-lying areas throughout the project site.
Improvements to surrounding roadways are included in the project description to address future traffic circulation and roadway operations needs. These improvements would occur on Highland Valley Road and at the intersection of SR 67 and Highland Valley Road.
Educational information would be presented to home buyers and would include descriptions of wildlife and vegetation native to the area, explanations of local cultural resources, limitations on activities that may occur in community open space areas, restrictions on sensitive resources that may exist on individual properties, and legal implications of disturbing cultural resource sites.
Buffers and natural barriers would provide a natural separation between development and open space as an alternative to the use of fences, walls, or other physical barriers.
Where residential lots abut dedicated open space lots, the rear 100 feet of the lot adjacent to the open space would be established as an LBZ.
A minimum buffer of 50 feet would be provided within the dedicated open space lots between sensitive habitats and the adjacent residential lots.
The LBZs incorporated into the project would create a buffer to protect homes from potential wildfire in the adjacent open space.
Natural barriers to discourage infringement into the open space outside of trail areas would include materials such as impassible brush, mounding, rocks, and trees or shrubs at potential entry points.
Signage would be provided along key points between developed areas and open space areas to indicate that the area is a sensitive open space preserve and no entry except at designated trail areas is allowed.
Areas affected by trenching for utility lines would be reestablished with preconstruction contours and revegetated with a County-approved seed mix.
The project has been designed with minimal fencing. Fencing would be included in the project design only where necessary to enclose animals or special circumstances where natural barriers or buffer areas would not create an adequate physical separation.
Allowed fencing types would include strand wire, wooden rail, or other natural materials. No chain link or similar type of fencing would be allowed.
Large animal enclosures would be subject to specific guidelines for the type of fencing material that may be used.
Restrictions would be placed on the outdoor activity of domestic pets because of potential encroachment into the adjacent open space areas (restrictions may include leashing at all times, bells on cat collars, etc.).
Animal keeping would be allowed per County of San Diego regulations.
No street lighting would be used within the proposed project site. Minimal light would be installed at project entries.
Homeowners could have exterior lighting within allowed parameters, such as motion lights, shutoff timers, and downshielding of lights.
Specific natural areas throughout the open space of Area A would be enhanced with compatible and appropriate plantings, such as the drainage corridors within Area A.
Project design allows for natural vegetation, open space areas, and the onsite drainage swales to serve as biofilters for runoff from the project.
Specific requirements would be designed to prevent runoff from stables and corral areas, such as removal of manure and other maintenance requirements.
Signage to accent the entry points would be crafted to match the rural character of the project and landscaped with subtle native plantings and rock outcroppings.
The landscape concept plan focuses on the use of native plant species appropriate to the individual area of the project.

Project Design Features
The landscaping for the project would build a community theme focused on maintaining the existing natural and unique features of the site, specifically oak trees and rock outcroppings.
The design guidelines will encourage a transitional landscape approach with native and naturalized plant material suited for sustainable maintenance practices. All planting would be subject to the specific plant palette for each specific area.
Avigation Easements Dedications and Overflight Easement Dedications would be placed over areas required for airspace protection by the FAA.
The following measures would be incorporated into the project and specified on the grading plans to minimize the emissions of PM_{10}, and $PM_{2.5}$: • Minimize land disturbance; • Stabilize graded areas as quickly as possible to minimize fugitive dust; • Apply chemical stabilizer or pave the last 100 feet of internal travel path within the construction site prior to public road entry; • Install wheel washers adjacent to a paved apron prior to vehicle entry on public roads; • Remove any visible track-out into traveled public streets within 30 minutes of occurrence; • Wet wash the construction access point at the end of each workday if vehicle travel on unpaved surfaces occurred; • Provide sufficient perimeter erosion control to prevent washout of silty material onto public roads; • Cover haul trucks or maintain at least 12 inches of freeboard to reduce blow-off during hauling; • Suspend all soil disturbance and travel on unpaved surfaces if winds exceed 25 mph miles per hour; • Cover/water onsite stockpiles of excavated material; • Hydroseed, landscape, or develop disturbed areas as quickly as possible and as directed by the County to reduce dust generation; and • Enforce a 15 mph speed limit on unpaved surfaces.
The following engineering measures would be implemented as part of the project: • Geotechnical engineer shall selectively test fill during site preparation and review any unusual or unexpected conditions and recommend measures if necessary; • During site preparation, soil removal shall include existing colluvium, alluvium, older alluvium, and highly weathered bedrock onsite. The exposed surface shall be reprocessed prior to the addition of fill; • If soil imports are required, samples of the soil shall be evaluated by a geotechnical engineer to ensure compatibility with onsite soils and the recommendations of the geotechnical report; • During remedial earthwork, including lot capping and cut/fill transitions, shall be implemented with further evaluation of conditions in the field as grading occurs; • Placement of an erosion control fabric, or similar protective system, shall be placed over graded slope faces in order to minimize erosion of the slope face until a suitable vegetation cover is established; • All cut slopes shall be mapped by the project engineering geologist during grading to allow amendments to mitigation as necessary; and • Additional or alternative measures may be required by the County Engineer to ensure soils are appropriately engineered and stabilized prior to development.

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