



County of San Diego

MARK WARDLAW
DIRECTOR

PLANNING & DEVELOPMENT SERVICES
5510 OVERLAND AVENUE, SUITE 310, SAN DIEGO, CA 92123
(858) 505-6445 General
www.SDCPDS.org

KATHLEEN A. FLANNERY
ASSISTANT DIRECTOR

March 12, 2020

Statement of Reasons for Exemption from Additional Environmental Review and 15183 Checklist Pursuant to CEQA Guidelines §15183

Project Name: Aldi Ramona
Project Record Numbers: PDS2018-STP-18-021
Environmental Log Number: PDS2018-ER-18-09-007

APN(s): 281-171-04-00

Lead Agency Name and Address:
County of San Diego
Planning and Development Services
5510 Overland Avenue, Suite 110
San Diego, CA 92123-1239

County Staff Contact:
Hunter McDonald
(858) 495-5330
Hunter.McDonald@sdcounty.ca.gov

Project Location:
The Project is located within the unincorporated community of Ramona in central San Diego County. The 2.5-acre Project Site is located at the corner of 16th Street and Main Street, within the Ramona Community Plan Area. The site is adjacent to properties designated by the General Plan as Village to the north, south, and west, and Public / Semi-Public Facilities to the east. The site is accessed by 16th Street.

Project Applicant Name and Address:
Skip Janes
12661 Aldi Place
Moreno Valley, CA 92555

General Plan
Community Plan: Ramona
Regional Categories: Village
Land Use Designations: General Commercial

Density: N/A
Floor Area Ratio (FAR) N/A

Zoning

Use Regulation: RMV5
Minimum Lot Size: N/A
Special Area Regulation Community Design Review (B), Airport (C), Design Review (D), (D5)

Description of Project:

The Aldi Ramona Project (Project) proposes the construction and operation of a 19,857-square-foot grocery store. The building incorporates LEED and Green Globe design elements and several energy-saving design features, including a PVC/KEE roof membrane. In addition, 41,388 square feet of landscaping consisting of large flowering, canopy, and evergreen trees such as jacaranda, coastal live oak, and fruitless olive trees, and shrubs such as California buckthorn, Cleveland sage and lilac verbenas is proposed to screen the building from the view of pedestrian and vehicle traffic. The landscaping will be maintained by a "Smart Control" irrigation system which reduces water usage by 40%. Additionally, 88 parking spaces, including 8 reserved spaces for Clean Air Vehicles with conduits for future electric vehicle charging stations, are proposed. Pipe/swale and biofiltration facilities would be implemented as part of the project design to avoid flooding offsite. The property is currently vacant but has been previously disturbed. Total earthwork for the Project would include 3,000 cubic yards of excavation, 3,225 cubic yards of fill, and 225 yards of import. Sewer and water would be provided by the Ramona Municipal Water District, and the project has been reviewed and approved by the San Diego County Fire Authority on August 1, 2018. Primary and delivery access to the site would be provided by 16th Street, and no curb cuts or other disturbances are proposed for Main Street.

The Project Site is located along Main Street in the Paseo subarea of Ramona's Village Center between other commercial buildings and the County of San Diego Sheriff's Station. The Paseo is intended to be the main development area in the Village Center, as it has the most potential for Big Box and Large-Format Retail development. The Project has been reviewed by the Ramona Design Review Board and the Ramona Community Planning Group, and was approved by both with the recommended conditions that no cacti or succulents be included in the landscaping plan and that improvements be made to the intersection at 16th Street and Main Street. The Project will be implementing road improvements on 16th Street including widening and repaving the road. The Project design will also preserve the Eucalyptus trees located on the property along Main Street in conformance with the Ramona Village Form-Based Code's general standards for the Paseo subarea of the Ramona Village Center. The Ramona Village Form-Based Code is aligned with the General Plan goals, policies, and land use designations.

Project Site Description:

The Project Site is located in the community of Ramona within unincorporated San Diego County. The Ramona Village Form-Based Code guides development within the Ramona Village Center and is intended to preserve and promote the character of Ramona while creating a balanced environment for Ramona residents, business owners, and visitors. The Project site is located within the Ramona Village Center in the Center Zoning District (RMV5) of the Paseo and is bounded by Village-zoned lots to the north, south, and west, and by the County of San Diego Sheriff's Station to the east. Land use designations surrounding the Project Site include Village Residential, Rural, and Semi-Rural lots. The Project Site is directly adjacent and north of Main Street, which becomes State Route 67 to the southwest and State Route 78 to the northeast. The topography of the site is relatively sloped, and portions of the site have slopes between 15 and 25%.

Discretionary Actions:

Discretionary permits for the Project include a Site Plan for Community Design Review and a Major Grading Permit (PDS2020-LDGRMJ-30257).

Overview of 15183 Checklist

California Public Resources Code section 21083.3 and California Environmental Quality Act (CEQA) Guidelines Section 15183 provide an exemption from additional environmental review for projects that are consistent with the development density established by existing zoning, community plan or general plan policies for which an Environmental Impact Report (EIR) was certified, except as might be necessary to examine whether there are project-specific significant effects which are peculiar to the project or its site. Section 15183 specifies that examination of environmental effects shall be limited to those effects that: (1) Are peculiar to the project or the parcel on which the project would be located, and were not analyzed as significant effects in a prior EIR on the zoning action, general plan, or community plan, with which the project is consistent, (2) Are potentially significant off-site impacts and cumulative impacts which were not discussed in the prior EIR prepared for the general plan, community plan or zoning action, or (3) Are previously identified significant effects which, as a result of substantial new information which was not known at the time the EIR was certified, are determined to have a more severe adverse impact than discussed in the prior EIR. Section 15183(c) further specifies that if an impact is not peculiar to the parcel or to the Project, has been addressed as a significant effect in the prior EIR, or can be substantially mitigated by the imposition of uniformly applied development policies or standards, then an additional EIR need not be prepared for that project solely on the basis of that impact.

General Plan Update Program EIR

The County of San Diego General Plan Update (GPU) establishes a blueprint for future land development in the unincorporated County that meets community desires and balances the environmental protection goals with the need for housing, agriculture, infrastructure, and economic vitality. The GPU applies to all of the unincorporated portions of San Diego County and directs population growth and plans for infrastructure needs, development, and resource protection. The GPU included adoption of new General Plan elements, which set the goals and policies that guide future development. It also included a corresponding land use map, a County Road Network map, updates to Community and Subregional Plans, an Implementation Plan, and other implementing policies and ordinances. The GPU focuses population growth in the western areas of the County where infrastructure and services are available in order to reduce the potential for growth in the eastern areas. The objectives of this population distribution strategy are to: 1) facilitate efficient, orderly growth by containing development within areas potentially served by the San Diego County Water Authority (SDCWA) or other existing infrastructure; 2) protect natural resources through the reduction of population capacity in sensitive areas; and 3) retain or enhance the character of communities within the unincorporated County. The SDCWA service area covers approximately the western one third of the unincorporated County. The SDWCA boundary generally represents where water and wastewater infrastructure currently exist. This area is more developed than the eastern areas of the unincorporated County and would accommodate more growth under the GPU.

The GPU EIR was certified in conjunction with adoption of the GPU on August 3, 2011. The GPU EIR comprehensively evaluated environmental impacts that would result from Plan implementation, including information related to existing site conditions, analyses of the types and magnitude of project-level and cumulative environmental impacts, and feasible mitigation measures that could reduce or avoid environmental impacts.

Summary of Findings

The Aldi Ramona Project is consistent with the analysis performed for the GPU EIR. Further, the GPU EIR adequately anticipated and described the impacts of the Project, identified applicable mitigation measures necessary to reduce Project specific impacts, and the Project implements these mitigation measures (see [http://www.sdcounty.ca.gov/PDS/gpupdate/docs/BOS_Aug2011/EIR/FEIR_7.00 - Mitigation Measures 2011.pdf](http://www.sdcounty.ca.gov/PDS/gpupdate/docs/BOS_Aug2011/EIR/FEIR_7.00_-_Mitigation_Measures_2011.pdf) for complete list of GPU Mitigation Measures.

A comprehensive environmental evaluation has been completed for the Project as documented in the attached §15183 Exemption Checklist. This evaluation concludes that the Project qualifies for an exemption from additional environmental review because it is consistent with the development density and use characteristics established by the County of San Diego General Plan, as analyzed by the San Diego County General Plan Update Final Program EIR (GPU EIR, ER #02-ZA-001, SCH #2002111067), and all required findings can be made.

In accordance with CEQA Guidelines §15183, the Project qualifies for an exemption because the following findings can be made:

1. The Project is consistent with the development density established by existing zoning, community plan or general plan policies for which an EIR was certified.

The proposed Project consists of a commercial use and does not propose additional development density or residential uses that would be in conflict with the General Commercial Land Use Designation or the Village Regional Category for which the GPU EIR was certified.

2. There are no Project specific effects which are peculiar to the Project or its site, and which the GPU EIR Failed to analyze as significant effects.

The subject property is no different than other properties in the surrounding area, and there are no Project-specific effects which are peculiar to the Project or its site. The Project Site is located adjacent to similarly sized general commercial lots in the Village Center District of the Paseo, which is designed as the primary commercial hub of the Ramona Village. Other commercial lots within one half mile on Main Street include a 99-cent store, Albertsons, Rite Aid, Stater Bros Market, CVS and Kmart. While there are vernal pools on site, these were analyzed during the preparation of the General Plan when it was determined that this property should be designated for General Commercial Use. Mitigation for these pools is drawn from the General Plan EIR and is described in more detail in Sections 4, Biological Resources. The Paseo area consists of a thoroughfare lined by commercial developments such as retail stores and restaurants, and is a logical site within the Ramona Village for a grocery store.

In addition, as explained further in the 15183 Checklist below, all project impacts were adequately analyzed by the GPU EIR. The Project could result in potentially significant impacts to Biological Resources, Cultural Resources, Transportation and Traffic, and Wildfire. However, applicable mitigation measures specified within the GPU EIR have been made conditions of approval for this project and will reduce impacts to the extent feasible.

3. There are no potentially significant off-site and/or cumulative impacts which the GPU EIR failed to evaluate.

The Project is consistent with the density and use characteristics of the development considered by the GPU EIR and would represent a small part of the growth that was forecast for build-out of the General Plan. The GPU EIR considered the incremental impacts of the Project, and as explained further in the 15183 Exemption Checklist below, no potentially significant off-site or cumulative impacts have been identified which were not previously evaluated. In addition, the Ramona Village Form-Based Code found the Village Center portion of the Paseo to be the most suitable location for commercial development within the Ramona Village.


4. There is no substantial new information which results in more severe impacts than anticipated by the GPU EIR.

As explained in the 15183 exemption checklist below, no new information has been identified which would result in a determination of a more severe impact than what had been anticipated by the GPU EIR. As previously stated, the Project could result in potentially significant impacts to Biological Resources, Cultural Resources, Transportation and Traffic, and Wildfire. The General

Plan EIR found impacts to special status species and riparian habitat or other sensitive natural communities to be significant and unmitigable, but this project will mitigate the impact with measures BIO-1.6 and 1.7, as further detailed below. Additionally, the General Plan EIR found impacts to cultural resources to be potentially significant, but this project will not increase the impacts analyzed in the EIR because it is consistent with the land use designation specified in the General Plan. Impacts to traffic will also be mitigated by measures Tra-1.4 and Tra-1.7, and are therefore less than the impacts identified in the General Plan, which were determined to be significant and unmitigable. The General Plan EIR also found impacts to Wildfire to be significant and unmitigable but impacts to wildfire will be less than significant without mitigation because of the location of the site, which is 0.8 miles from the nearest fire station.

5. The Project will undertake feasible mitigation measures specified in the GPU EIR.

As explained in the 15183 exemption checklist below, the Project will undertake feasible mitigation measures specified in the GPU EIR. These GPU EIR mitigation measures will be undertaken through Project design, compliance with regulations and ordinances, or through the Project's conditions of approval.

 _____ Signature	3/12/2020 _____ Date
Hunter McDonald _____ Printed Name	Land Use/Environmental Planner _____ Title

CEQA Guidelines §15183 Exemption Checklist

Overview

This checklist provides an analysis of potential environmental impacts resulting from the Project. Following the format of CEQA Guidelines Appendix G, environmental effects are evaluated to determine if the Project would result in a potentially significant impact triggering additional review under Guidelines section 15183.

- Items checked “Significant Project Impact” indicates that the Project could result in a significant effect which either requires mitigation to be reduced to a less than significant level or which has a significant, unmitigated impact.
- Items checked “Impact not identified by GPU EIR” indicates the Project would result in a Project specific significant impact (peculiar off-site or cumulative that was not identified in the GPU EIR.
- Items checked “Substantial New Information” indicates that there is new information which leads to a determination that a Project impact is more severe than what had been anticipated by the GPU EIR.

A Project does not qualify for a §15183 exemption if it is determined that it would result in: 1) a peculiar impact that was not identified as a significant impact under the GPU EIR; 2) a more severe impact due to new information; or 3) a potentially significant off-site impact or cumulative impact not discussed in the GPU EIR.

A summary of staff’s analysis of each potential environmental effect is provided below the checklist for each subject area. A list of references, significance guidelines, and technical studies used to support the analysis is attached in Appendix A. Appendix B contains a list of GPU EIR mitigation measures.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
1. AESTHETICS – Would the Project:			
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

- 1(a) A vista is a view from a particular location or composite views along a roadway or trail, and scenic vistas often refer to views of natural lands but may also be compositions of natural and developed areas. Views from scenic roadways are discussed below in 1(b). Resource Conservation Areas (RCAs) are identified within the GPU EIR and are the closest that the County comes to specifically designating scenic vistas. Many public roads and trails in the County currently have views of RCAs or expanses of natural resources that would have the potential to be considered scenic vistas.

The Project Site would not be considered a scenic vista because the site has been previously disturbed and the area is surrounded by commercial development. The Project site is located within the vicinity of certain trail systems which may provide scenic views within the Ramona community, including the Sun Valley Pathway, Santa Maria Creekside Trail, Bulldog Pathway, and Montecito Pathway. The Project would not detract from views from public trails because the Project is consistent with surrounding development and the Ramona Form-Based Code, and visibility to the site is restricted due to intervening land uses and/or vegetation.

The GPU EIR determined impacts on scenic vistas to be less than significant. For the reasons described above, the Project would not have a substantial adverse effect on a scenic vista, and is therefore consistent with the analysis provided within the GPU EIR.

- 1(b) State scenic highways refer to those highways that are officially designated by the California Department of Transportation (Caltrans) as scenic (Caltrans - California Scenic Highway Program). Generally, the area defined within a State scenic highway is the land adjacent to and visible from the vehicular right-of-way.

No Scenic Highways designated by Caltrans are in proximity to the project site. However, the County General Plan identifies roadways that are designated as scenic corridors within the Conservation and Open Space Element and have been included as part of the County Scenic Highway System. Designated scenic roadways located in the vicinity of the project site include Highland Valley Road (Main Street) and State Route 78 (South 10th Street), which are considered County Scenic Highways. These Scenic Highways were designated because of the views they provide of oak and riparian woodland habitats in the basins and

hills surrounding the highways. However, visibility to the site from State Route 78 would be restricted due to intervening land uses, the Eucalyptus colonnade, and screening vegetation. The project site would be visible from Highland Valley Road scenic highway, but visibility would be interrupted by the existing row of eucalyptus trees and proposed large canopy and flowering trees between the road and the Project. Additionally, the character of the Project is consistent with surrounding development and conforms with the Ramona Form-Based Code and Design Guidelines, and therefore would not substantially detract from the views along Highland Valley Road. Although the built nature of the Project would vary from the existing condition, it is not expected to demonstrate character that is inconsistent with other commercial uses in the overall area.

Lastly, no identified visual resources such as unique topographic features, rock outcroppings, or historic buildings have been identified on-site. A row of eucalyptus trees on the project site adjacent and parallel to Main Street which were planted during the early history of the Ramona Village would be avoided by the Project design in compliance with the Ramona Village Form-Based Code.

The GPU EIR determined impacts on scenic resources to be less than significant with mitigation. For the reasons described above, the Project would not substantially damage scenic resources within a state scenic highway, nor will it modify or impact any scenic resources on the property; as such, it is consistent with the analysis provided within the GPU EIR.

- 1(c) Visual character is the objective composition of the visible landscape within a viewshed. The Project site is within the Village of Ramona, where the existing visual character and quality include general commercial uses which conform to Ramona's Community Design Guidelines and the Ramona Form-Based Code. The existing setting is characterized by surrounding retail stores and restaurants, with a County of San Diego Sheriff's Station on the Site's eastern boundary, across 16th Street. The land directly west and northwest of the Project site is undeveloped but has been previously graded. The Project site and surrounding land is generally flat with some slopes between 15 and 25% and some greater than 25% at Main Street and the northwest corner of the lot by 16th St. These slopes are avoided by the project design. Viewer groups of the Project site would primarily include motorists and pedestrians. This Project will be designed to fit the visual character of the Village Center District of The Paseo, and will be landscaped with large flowering, canopy, and evergreen trees behind the colonnade of Eucalyptus trees along Main Street, and therefore will contribute more to the visual character of the Village than the current empty lot.

The GPU EIR determined impacts on visual character or quality to be significant and unavoidable. The Project within the landscape would not detract from or contrast with the existing visual character and/or quality of the surrounding area because it is consistent with the General Plan Land Use allowance on-site and conforms with the Ramona Community Plan, Ramona Form-Based Code, and Ramona Design Guidelines. As such, it is consistent with the analysis provided within the GPU EIR.

- 1(d) The Project would use outdoor lighting but is not located within Zone A of the County of San Diego Light Pollution Code (within twenty miles of the Mount Laguna Observatory or the Palomar Observatory). The Project is located within Zone B of the Light Pollution Code (at least twenty miles of the Mount Laguna Observatory or the Palomar Observatory) and would not adversely affect nighttime views or astronomical observations because the Project would be required to conform to the Light Pollution Code (Section 51.201-51.209).

This would include the utilization of the Zone B lamp type and shielding requirements per fixture and hours of operation limitations for outdoor lighting and searchlights.

The GPU EIR determined impacts from light or glare to be significant and unavoidable. Because of the reasons described above, the Project would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area. As such, the Project is consistent with the analysis provided within the GPU EIR.

Conclusion

With regards to the issue area of Aesthetics, the following findings can be made:

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. No mitigation measures contained within the GPU EIR would be required because Project-specific impacts would be less than significant.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
2. Agriculture/Forestry Resources			
– Would the Project:			
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, or other agricultural resources, to a non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Conflict with existing zoning for, or cause rezoning of, forest land, timberland, or timberland zoned Timberland Production?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Result in the loss of forest land, conversion of forest land to non-forest use, or involve other changes in the existing environment, which, due to their location or nature, could result in conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Important Farmland or other agricultural resources, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

- 2(a) The Project site does not contain any land designated as Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance according to the State Farmland Mapping and Monitoring Program (FMMP). The Project is the development of a grocery store in a lot zoned for General Commercial use. The site has County candidate soils of Statewide Importance that meet the definition of FMMP pursuant to Guidelines for Determining Significance – Agricultural Resources. However, because the lot is zoned Village and the General Plan regional category is General Commercial, impacts have already been analyzed in the GPU EIR. No wells exist onsite, and the site is also surrounded by other commercial development, public services, and higher-density residential lots and is therefore not a viable agricultural resource due to potential interface conflicts. Therefore, due to the Land Use Designations in the vicinity and lack of available resources on the site, no potentially significant impact or conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide or Local Importance to a non-agricultural use would occur as a result of this project.

The GPU EIR determined impacts from direct and indirect conversion of agricultural resources to be significant and unavoidable. The Project would not convert potential agricultural resources to a non-agricultural use. As such, the Project is consistent with the analysis provided in the GPU EIR.

- 2(b) The Project site is not located within a Williamson Act contract or an agricultural preserve. The nearest preserve is 1.6 miles southeast of the Project Site, and the closest land under a Williamson Act Contract is 3.4 miles east of the Project Site. No associated interface conflicts or impacts are anticipated from implementation of the Project due to intervening distances. Additionally, the Project, which proposes the development of a grocery store, is compatible with the General Plan and consistent with the land use types in the surrounding area. Therefore, the project would not present any significant impacts or interface conflicts with the surrounding environment and would not conflict with existing zoning for agricultural use or a Williamson Act contract.

The GPU EIR determined impacts from land use conflicts to be less than significant with mitigation. As the Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR.

- 2(c) The Project site including any offsite improvements do not contain any forest lands as defined in Public Resources Code section 12220(g), therefore Project implementation would not result in the loss or conversion of forest land to a non-forest use. The outer edge of the Cleveland National Forest is located approximately 3 miles to the north of the Project site. Thus, due to distance, the Project would have no impact on the Cleveland National Forest. In addition, the County of San Diego does not have any existing Timberland Production Zones.

The GPU EIR determined impacts from direct and indirect conversion of agricultural resources (including forest resources), to be significant and unavoidable. However, the Project would have a less-than-significant impact to forest resources. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 2(d) The GPU EIR concluded this impact to be significant and unavoidable. As indicated in response 2(c), the Project site and any off-site improvements do not contain any forest

lands as defined in Public Resources Code section 12220(g), nor are they located near any forest lands. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 2(e) No agricultural operations are currently taking place on the Project Site, nor does the site or surrounding area within a radius of one half mile contain any active agricultural operations or lands designated as Prime Farmland, Unique Farmland, or Farmland of Local Importance as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency. The surrounding areas within one half-mile radius have been categorized by the FMMP as Urban Built-up and Other land.

The GPU EIR determined impacts from direct and indirect conversion of agricultural resources (including forest resources) to be significant and unavoidable. However, the Project determined impacts to agricultural resources to be less-than-significant. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

Conclusion

With regards to the issue area of Agricultural/Forestry Resources, the following findings can be made:

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
5. No mitigation measures contained within the GPU EIR would be required because Project-specific impacts would be less than significant.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
3. Air Quality – Would the Project:			
a) Conflict with or obstruct implementation of the San Diego Regional Air Quality Strategy (RAQS) or applicable portions of the State Implementation Plan (SIP)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- | | | | |
|---|--------------------------|--------------------------|--------------------------|
| d) Expose sensitive receptors to substantial pollutant concentrations? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| e) Create objectionable odors affecting a substantial number of people? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Discussion

- 3(a) The RAQS and SIP are based on General Plans within the region and the development assumptions contained within them. The Project is for the development of a grocery store with parking. The lot is designated for a General Commercial Land Use. Thus, the Project is consistent with the land use designation allowed under the General Plan and would not conflict with the RAQS or SIP.

The GPU EIR determined impacts on air quality plans to be less than significant. As the Project would have a less-than-significant for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 3(b) The construction phase of the Project would involve the excavation of 3,000 cubic yards, fill of 3,225 cubic yards and the import of 225 cubic yards of material. Emissions from the grading and construction phases would be minimal, temporary and localized, resulting in pollutant emissions below the screening-level criteria established by the LUEG guidelines for determining significance.

Operational emissions for the Project would be associated with vehicle trips to and from the Project Site. The vehicle trip generation for the Project is expected to have fewer than 900 Average Daily Trips (ADT). According to the Bay Area Air Quality Management District CEQA Guidelines for Assessing the Air Quality Impacts of Projects and Plans, projects that generate less than 2,000 ADT are below the screening-level criteria established by the LUEG guidelines for determining significance. The Project ADT would be below this threshold and would therefore not have a significant impact from vehicle emissions.

The GPU EIR determined significant and unavoidable impacts to air quality violations. However, the Project would have a less-than-significant impact to air quality violations. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 3(c) The Project would contribute to particulate pollution (PM10), nitrogen oxide gases (NOx), and volatile organic compounds (VOCs) emissions from construction/grading activities; however, the incremental increase would not exceed established screening thresholds (see question 3(b) above). Additionally, all adhesives, sealants, paints, flooring systems, and composite wood products are specified with low VOC.

The GPU EIR determined significant and unavoidable impacts to non-attainment criteria pollutants. However, the Project would have a less than significant impact to non-attainment criteria pollutants. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 3(d) The Project would introduce additional commercial square footage which is not considered a new sensitive receptor. Air quality regulators typically define sensitive receptors as

schools (Preschool – 12th Grade), hospitals, resident care facilities, day-care centers, residences, or other facilities that may house individuals with health conditions that would be adversely impacted by changes in air quality. The Project would also not be considered a point-source of significant emissions.

The closest sensitive receptors to the Project Site are the Ramona Lutheran Christian School, which is located approximately 0.15 miles southeast of the site, and the Ramona Unified School District which is located approximately 0.2 miles northwest of the Project Site. Additionally, residential use are located approximately 500 feet to the west, 450 feet to the north, and 800 feet to the east. The Project would generate construction emissions in the vicinity of sensitive receptors. However, these emissions would be localized and temporary, and abidance to the County of San Diego Grading Ordinance, SDAPCD Rule 55, and to a confined construction schedule would reduce emissions and exposure to construction emissions. Additionally, the PVC/KEE roof membrane is designed to reduce the “heat island” effect and slow the reaction of smog pollutants. As such, the Project would not expose sensitive receptors to excessive concentrations of air pollutants.

The GPU EIR determined significant and unavoidable impacts to sensitive receptors. However, the Project would have a less than significant impact to sensitive receptors. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 3(e) The Project could produce objectionable odors during construction from paving, painting, and equipment operation; however, these substances, if present at all, would be minimal and temporary. The Project could also produce objectionable odors during operation of the commercial components however, these substances, if present at all, would only be in trace amounts (less than 1 µg/m³). Therefore, the Project would not create objectionable odors affecting a substantial number of people.

The GPU EIR determined less than significant impacts from objectionable odors. As the Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

Conclusion

With regards to the issue area of Air Quality, the following findings can be made:

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. No mitigation measures contained within the GPU EIR would be required because Project specific impacts would be less than significant.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
4. Biological Resources – Would the Project:			
Have a substantial adverse effect, either directly or through habitat modifications, on any candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Conflict with the provisions of any adopted Habitat Conservation Plan, Natural Communities Conservation Plan, other approved local, regional or state habitat conservation plan or any other local policies or ordinances that protect biological resources?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

- 4(a) Biological resources on the Project Site were evaluated in a Biological Technical Report prepared by Helix Environmental Planning, dated December 2019. The site contains non-native grassland, eucalyptus woodland, and disturbed habitats. One sensitive wildlife species was identified onsite; the federally listed endangered San Diego fairy shrimp (*Branchinecta sandiegonensis*). No sensitive plant species were identified onsite. As a result of this project, impacts will occur to 1.6 acres of non-native grassland, 0.4 acres of eucalyptus woodland, 0.5 acres of disturbed habitat, and 0.01 acres of vernal pool basins supporting San Diego fairy shrimp. The site is located within the County's draft North County Multiple Species Conservation Program (MSCP) in land designated as outside the Pre-Approved Mitigation Area (PAMA).

As considered by the GPU EIR, project impacts to sensitive habitat and/or species will be mitigated through ordinance compliance and through implementation of the following mitigation measures: purchase of 0.8 acres of non-native grassland habitat and two vernal

pools credits at the Ramona Grasslands Conservation Bank and breeding season avoidance to prevent brushing, clearing, and/or grading between January 15th and September 1st. The GPU EIR identified these mitigation measures as Bio 1.6 and Bio 1.7. A Section 10(a)(1)(B) incidental take permit dated August 26, 2015 was issued by the United States Fish and Wildlife Service for take of the federally endangered San Diego fairy shrimp and expires on August 26, 2020.

- 4(b) Based on the Biological Resources Report, no wetlands or jurisdictional waters were found onsite or offsite. The following sensitive habitat was identified on the site: non-native grasslands. As detailed in response a) above, direct and indirect impacts to sensitive natural communities identified in the RPO, NCCP, Fish and Wildlife Code, and Endangered Species Act are mitigated.

As considered by the GPU EIR, project impacts to sensitive habitat and/or species will be mitigated through ordinance compliance and through implementation of the following mitigation measures: purchase of 0.8 acres of non-native grassland habitat and two vernal pools credits at the Ramona Grasslands Conservation Bank and breeding season avoidance to prevent brushing, clearing, and/or grading between January 15th and September 1st. The GPU EIR identified these mitigation measures as Bio 1.6 and Bio 1.7.

- 4(c) The Project site does not contain any wetlands as defined by Section 404 of the Clean Water Act, therefore, no impacts will occur.
- 4(d) Based on a GIS analysis, the County's Comprehensive Matrix of Sensitive Species, and a Biological Resources Report, it was determined that the site is not part of a regional linkage/corridor nor is it in an area considered regionally important for wildlife dispersal. The site would not assist in local wildlife movement as it lacks connecting vegetation and visual continuity with other potential habitat areas in the general project vicinity.
- 4(e) The project is located within the draft North County Multiple Species Conservation Program (MSCP) and outside of the South County MSCP. Therefore, it does not require conformance with the Biological Mitigation Ordinance (BMO). The project is consistent with the County's Guidelines for Determining Significance for Biology, the Resource Protection Ordinance (RPO), and the Migratory Bird Treaty Act (MBTA) with the implementation of mitigation. The project will not conflict with the provisions of any adopted Habitat Conservation Plan, Natural Communities Conservation Plan, other approved local, regional or state habitat conservation plan or any other local policies or ordinances that protect biological resources.

Conclusion

The project could result in potentially significant impacts to biological resources; however, further environmental analysis is not required because:

1. No peculiar impacts to the project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.

4. Feasible mitigation measures contained within the GPU EIR will be applied to the project, including Bio 1.6 and 1.7.

Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
----------------------------------	--	-----------------------------------

5. Cultural Resources – Would the Project:

- a) Cause a substantial adverse change in the significance of a historical resource as defined in 15064.5?
- b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to 15064.5?
- c) Directly or indirectly destroy a unique geologic feature?
- d) Directly or indirectly destroy a unique paleontological resource or site?
- e) Disturb any human remains, including those interred outside of formal cemeteries?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

5(a) Based on an analysis of records by a County staff archaeologist on July 23, 2018, it has been determined that there are no historical resources on the Project Site. According the Ramona Community Plan, the eucalyptus trees along Main Street are associated with the early history of Ramona, but they are avoided by the project design and the Project will adhere to the Ramona Village Form-Based Code thoroughfare and building requirements.

5(b) Based on an analysis of records (including archaeological surveys) maintained by the County and the South Coastal Informational Center, it has been determined that there are no impacts to archaeological resources because the project site has been historically disturbed. The proposed project is not subject to AB-52 consultation because a Negative Declaration, Mitigated Negative Declaration, nor Environmental Impact Report is required for this project.

As considered by the GPU EIR, potential impacts to cultural resources will be mitigated through compliance with the Grading Ordinance and through conformance with the County's Cultural Resource Guidelines if resources are encountered.

5(c) The site does not contain any unique geologic features that have been listed in the County's Guidelines for Determining Significance for Unique Geology Resources nor does the site support any known geologic characteristics that have the potential to support unique geologic features.

5(d) A review of the County's Paleontological Resources Maps and data on San Diego County's geologic formations indicates that the project is located on geological formations of Quaternary Alluvium that potentially contain unique paleontological resources.

As considered by the GPU EIR, potential impacts to paleontological resources will be mitigated through ordinance compliance and through implementation of the following mitigation measures: grading monitoring under the supervision of the project contractor

and conformance with the County's Paleontological Resource Guidelines if resources are encountered. The GPU EIR identified these mitigation measures as Cul-3.1.

- 5(e) Based on an analysis of records and archaeological surveys of the property, it has been determined that the Project Site does not include a formal cemetery or any archaeological resources that might contain interred human remains.

Conclusion

The project could result in potentially significant impacts to cultural resources; however, further environmental analysis is not required because:

1. No peculiar impacts to the project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. Feasible mitigation measures contained within the GPU EIR will be applied to the project, including Cul 3.1.

Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
----------------------------------	--	-----------------------------------

6. Energy Use – Would the Project:

a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

☐
☐
☐

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

☐
☐
☐

Discussion

Energy use was not specifically analyzed within the GPU EIR as a separate issue area under CEQA. At the time, Energy Use was contained within Appendix F of the CEQA Guidelines and since then has been moved to the issue areas within Appendix G of the CEQA Guidelines. However, the issue of energy use in general was discussed within the GPU and the GPU EIR. For example, within the Conservation and Open Space Element of the GPU, Goal COS-15 promotes sustainable architecture and building techniques that reduce emissions of criteria pollutants and GHGs, while protecting public health and contributing to a more sustainable environment. Policies, COS-15.1, COS-15.2, and COS-15.3 would support this goal by encouraging the design and construction of new buildings and upgrades of existing buildings to maximize energy efficiency and reduce GHG. Goal COS-17 promotes sustainable solid waste management. Policies COS-17.1 and COS-17.5 would support this goal by reducing GHG emissions through waste reduction techniques and methane recapture. The analysis below specifically analyzes the energy use of the Project.

- 6(a) The Project would increase the demand for electricity and natural gas at the Project Site, and gasoline consumption in the Project area during construction and operation relative to existing conditions. CEQA requires mitigation measures to reduce “wasteful, inefficient and unnecessary” energy usages (Public Resources Code Section 21100, subdivision [b][3]). Neither the law nor the State CEQA Guidelines establish criteria that define wasteful, inefficient, or unnecessary use. Compliance with the California Code of Regulations 2019 Title 24 Part 6 Building Code would result in highly energy-efficient buildings. However, compliance with building codes does not adequately address all potential energy impacts during construction and operation. It can be expected that energy consumption, outside of the building code regulations, would occur through the transport of construction materials to and from the site during the construction phase and the use of personal vehicles by residents.

Grading and Construction

During the grading and construction phases of the Project, the primary energy source utilized would be petroleum from construction equipment and vehicle trips. To a lesser extent, electricity would also be consumed for the temporary electric power for as-necessary lighting and electronic equipment. Activities including electricity would be temporary and negligible; therefore, electricity use during grading and construction would not result in wasteful, inefficient, or unnecessary consumption of energy. Any natural gas that may be consumed as a result of the Project construction would be temporary and negligible and would not have an adverse effect; therefore, natural gas used during grading and construction would also not result in wasteful, inefficient, or unnecessary consumption of energy. Aldi uses regional building materials and products that are extracted and manufactured within the region, which reduces energy usage associated with transporting construction materials to the Project site. Petroleum fuel consumed by construction equipment would be the primary energy resource expended over the course of grading and construction. Vehicle trips associated with the transportation of construction materials and construction workers commutes would also result in petroleum consumption, but to a lesser extent. Petroleum consumptions would be necessary for operation and maintenance of construction equipment and would not be beyond what is necessary for construction of the Project.

The energy needs for the Project construction would be temporary and are not anticipated to require additional capacity or increase peak or base period demands for electricity or other forms of energy. Construction equipment use and associated energy consumptions would be typical of that associated with the construction of commercial projects of this size in a village setting. Additionally, the Project is consistent with the General Plan and Zoning Ordinance. Thus, the Project’s energy consumption during the grading and construction phase would not be considered wasteful, inefficient, or unnecessary.

Operational

Operation of the Project would be typical of commercial land uses requiring natural gas and electricity and landscape maintenance activities. The Project would meet the California Code of Regulations Title 24 Standards for energy efficiency that are in effect at the time of construction. The Project would increase ADT by 877 trips, but the incorporation of bike parking and Clean Air Vehicle parking on site will promote a 15.8% reduction of VMT at the site. Additional energy-saving measures are incorporated into the building design, including:

- “Smart Control” Irrigation systems, which reduce water usage by 40%

- PVC/KEE roof membrane which reduces energy consumption and packaged rooftop units with R410A, a more environmentally friendly refrigerant
- Energy Management Systems and Smart Sub-meters which control HVAC and lighting and monitor electricity consumption, reducing energy use up to 9%
- Metered plumbing, XLerator energy efficient hand dryers, LED lighting with occupancy sensors, CO2 Advansor Compressor energy efficient refrigeration system, and leak detection.

Additionally, ALDI is incorporating photovoltaic systems at many stores, and this may be added as a feature to the Project at a later date. As such, the project would not be expected to result in wasteful, inefficient or unnecessary petroleum usage throughout Project operations.

As previously discussed, the GPU EIR did not analyze Energy as a separate issue area under CEQA. Energy was analyzed under the GPU and GPU EIR and has been incorporated within General Plan Elements. The Project would not conflict with policies within the GPU related to energy use, nor would it result in the wasteful, inefficient, or unnecessary consumption of energy resources, as specified within Appendix G of the CEQA Guidelines.

6b. The Project includes the following energy conservation measures:

- “Smart Control” Irrigation systems, which reduce water usage by 40%
- PVC/KEE roof membrane which reduces energy consumption and packaged rooftop units with R410A, a more environmentally friendly refrigerant
- Energy Management Systems and Smart Sub-meters which control HVAC and lighting and monitor electricity consumption, reducing energy use up to 9%
- Metered plumbing, XLerator energy efficient hand dryers, LED lighting with occupancy sensors, CO2 Advansor Compressor energy efficient refrigeration system, and leak detection.
- Bike parking facilities and Clean Air Vehicle parking with a conduit for future EV charging stations

The County's Climate Action Plan is a long-term plan that identifies strategies and measures to meet the County's targets to reduce GHG emissions by 2020 and 2030, consistent with the State's legislative GHG reduction targets, and demonstrates progress towards the State's 2050 GHG reduction goal (County of San Diego, 2017). Implementation of the CAP requires that new development Projects incorporate more sustainable design standards and implement applicable reduction measures consistent with the CAP. To help streamline this review and determine consistency of Projects with the CAP during development review, the County has prepared a CAP Consistency Review Checklist (Checklist). The Project would implement all applicable measures identified in the Checklist and would therefore be consistent with the County's Climate Action Plan. In addition, the Project would be consistent with several energy reduction policies of the County General Plan including policies COS-14.1, 14.2, 16.2, and COS-16.5. Additionally, the Project would be consistent with sustainable development and energy reduction policies, such as policy CO-15.4, through compliance with the most recent Title 24 standards at the time of Project construction. Therefore, the Project would implement energy reduction design features and comply with the most recent energy building standards consistent with applicable plans and policies. Therefore, the Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

As previously discussed, the GPU EIR did not analyze Energy as a separate issue area under CEQA. Energy was analyzed under the GPU and GPU EIR and has been incorporated within General Plan Elements. The Project would not conflict with policies within the GPU related to energy use or conflict with or obstruct a state or local plan for renewable energy or energy efficiency as specified within Appendix G of the CEQA Guidelines.

Conclusion

With regards to the issue area of Energy, the following findings can be made:

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. No mitigation measures contained within the GPU EIR would be required because Project specific impacts would be less than significant.

7. Geology and Soils – Would the Project:

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: (i) rupture of a known earthquake fault, (ii) strong seismic ground shaking or seismic-related ground failure, (iii) liquefaction, and/or (iv) landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in an on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

- 7(a)(i) The Project is not located in a fault rupture hazard zone identified by the Alquist-Priolo Earthquake Fault Zoning Act, Special Publication 42, Revised 1997, Fault-Rupture Hazards Zones in California. or located within any other area with substantial evidence of a known fault. Therefore, a less-than-significant impact from the exposure of people or

structures to adverse effects from a known fault-rupture hazard zone would occur as a result of this project, which is consistent with the GPU EIR determination.

- 7(a)(ii) The GPU EIR concluded this impact to be less than significant. To ensure the structural integrity of all buildings and structures, the Project must conform to the Seismic Requirements as outlined within the California Building Code. In addition, a soils report and compaction report with proposed foundation recommendation would be required to be approved before the issuance of a building permit per California Building Code Sections 1803 and 1804. Therefore, compliance with the California Building Code and the County Building Code would ensure that the Project would not result in a significant impact.
- 7(a)(iii) The Project site is within a “Potential Liquefaction Area” as identified in the County Guidelines for Determining Significance for Geologic Hazards, and it is underlain by some high shrink swell soils (expansive soils). As stated previously, the County requires a soils report and compaction report with proposed foundation recommendations to be approved prior to the issuance of a building permit. Therefore, there would be a less-than-significant impact from the exposure of people or structures to adverse effects from liquefaction, which is consistent with the GPU EIR determination.
- 7(a)(iv) The Project site is not located within a “Landslide Susceptibility Area” as identified in the County Guidelines for Determining Significance for Geologic Hazards. Therefore, impacts would be less than significant, which is consistent with the GPU EIR determination.
- 7(b) According to the Soil Survey of San Diego County, the soils on-site are identified as alfisols which have a soil erodibility rating of severe. However, the Project would not result in substantial soil erosion or the loss of topsoil because the Project would be required to comply with the Watershed Protection Ordinance (WPO) and Grading Ordinance which would ensure that the Project would not result in any unprotected erodible soils, would not alter existing drainage patterns, and would not develop steep slopes. Additionally, the Project would be required to implement Best Management Practices (BMPs) per the Priority Development Project Storm Water Quality Management Plan to prevent fugitive sediment. As such, the project would have a less-than-significant impact on soil erosion and topsoil loss, which is consistent with the GPU EIR determination.
- 7(c) As indicated in response (a)(iv), the site is not located on or near geological formations that are unstable or would potentially become unstable as a result of the project, nor is it within a “Landslide Susceptibility Area” as identified in the County Guidelines for Determining Significance for Geologic Hazards. Furthermore, the project will be required to comply with the WPO and Grading Ordinance which will ensure that the project would not result in any unprotected erodible soils and will not develop steep slopes that could cause landslides, lateral spreading, subsidence, liquefaction, or collapse. As such, the Project would have a less-than-significant impact on soil stability, which is consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.
- 7(d) The project is underlain by expansive soils as defined within Table 18-I-B of the Uniform Building Code (1994). However, as indicated in response 6(a)(iii), the project will not result in a significant impact because compliance with the Building Code and implementation of standard engineering techniques will ensure structural safety. The Project would have a less-than-significant impact for the reasons detailed above, which is consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 7(e) The Project Site would rely on public water and sewer for the disposal of wastewater. No septic tanks or alternative wastewater disposal systems are proposed. As such, the Project would have a less-than-significant impact on wastewater disposal systems, which is consistent with the GPU EIR determination.

Conclusion

With regards to the issue area of Geology and Soils, the following findings can be made:

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. No mitigation measures contained within the GPU EIR would be required because Project specific impacts would be less than significant.

8. Greenhouse Gas Emissions – Would the Project:

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Background on CAP and Litigation

The County of San Diego adopted a Climate Action Plan on February 14, 2018 which outlines actions that the County will undertake to meet its greenhouse gas (GHG) emissions reductions targets. Implementation of the CAP requires, among other things, that new development Projects incorporate more sustainable design standards and implement applicable reduction measures consistent with the CAP.

Discussion

Project Design Features:

The Project has incorporated design features to reduce the impacts associated with GHG. The below design features have been incorporated into this analysis:

- “Smart Control” Irrigation systems, which reduce water usage by 40%
- PVC/KEE roof membrane which reduces energy consumption and packaged rooftop units with R410A, a more environmentally friendly refrigerant
- Energy Management Systems and Smart Sub-meters which control HVAC and lighting and monitor electricity consumption, reducing energy use up to 9%
- Metered plumbing, XLerator energy efficient hand dryers, LED lighting with occupancy sensors, CO2 Advansor Compressor energy efficient refrigeration system, and leak detection

- Provision of bicycle parking facilities and Clean Air Vehicle parking with conduits for future Electric Vehicle Charging Stations
- Use of regional, recycled, and low-emitting (VOC) materials in building construction

Analysis

8(a) The Project would produce GHG emissions through grading and construction activities, as well as operational GHG emissions from vehicle trips to and from the site. Indirect GHG uses would also be produced from offsite sources such as water conveyance and utilities. However, the Project falls below the screening criteria that were developed to identify project types and sizes that would have less than cumulatively considerable GHG emissions. Additionally, from an operational perspective, the Project would be consistent with the density established under the General Plan. Therefore, the Project would have a less-than-significant impact for that, and other reasons, as detailed below.

To help streamline this review and determine consistency of Projects with the CAP during development review, the County has prepared a CAP Consistency Review Checklist (Checklist). The Project would implement all applicable measures identified in the Checklist and would therefore be consistent with the County's Climate Action Plan. Additionally, the California Air Pollution Control Officers Association (CAPCOA) prepared a white paper which recommends a 900 metric tons (MT) of carbon dioxide equivalent (CO₂e) per year screening level to determine the size of projects that would be likely to have a less than considerable contribution to the cumulative impact of climate change.

The Project would develop a grocery store that would fall below the aforementioned criteria. Additionally, the LEED and Green Globe design features described above also reduce impacts related to GHG emissions from the project. Due to the aforementioned factors, the Project would not generate GHG emissions that would have a significant impact on the environment.

The GPU EIR determined impacts to be less than significant with mitigation. As the Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

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

The GPU EIR determined impacts to applicable regulation compliance to be less than significant. As the Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

Conclusion

With regards to the issue area of Global Climate Change, the following findings can be made:

1. No peculiar impacts to the Project or its site have been identified.

2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. No mitigation measures contained within the GPU EIR would be required because Project specific impacts would be less than significant.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
9. Hazards and Hazardous Materials – Would the Project:			
a) Create a significant hazard to the public or the environment through the routine transport, storage, use, or disposal of hazardous materials or wastes or through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, or is otherwise known to have been subject to a release of hazardous substances and, as a result, would it create a significant hazard to the public or the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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

☐☐☐

Discussion

- 9(a) The Project would not create a significant hazard to the public or the environment because it does not propose the storage, use, transport, emission, or disposal of Hazardous Substances, nor are Hazardous Substances proposed or currently in use in the immediate vicinity. In addition, the project does not propose to demolish any existing structures onsite and therefore would not create a hazard related to the release of asbestos, lead based paint or other hazardous materials from demolition activities. As the Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.
- 9(b) The Project is located within one-quarter mile of an existing school (Ramona Lutheran Christian School). This school is located 0.2 miles directly southwest of the Project site on 16th street. Although the school is in close proximity to the Project site, the Project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of the schools. Furthermore, the Project is required to comply with applicable regulations pertaining to hazardous waste to ensure that impacts related to hazardous emissions and schools is less than significant. As such, the Project would have a less-than-significant impact for the reasons detailed above, which is consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.
- 9(c) Based on a comprehensive review, the Project site has not been subject to a release of hazardous substances, as the lot has never been developed or farmed. Additionally, the Project does not propose structures for human occupancy or significant linear excavation within 1,000 feet of an open, abandoned, or closed landfill, is not located on or within 250 feet of the boundary of a parcel identified as containing burn ash (from the historic burning of trash), and is not on or within 1,000 feet of a Formerly Used Defense Site. As such, the Project would have a less-than-significant impact for the reasons detailed above, which is consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.
- 9(d) The Project is located within Airport Influence Area two (2) of the Ramona Airport Land Use Compatibility Plan and is consistent with the Plan. The Project is not located within an Airport Safety Zone, within an Avigation Easement, or an Overflight area. The Project is located within a Federal Aviation Administration Height Notification Surface area. However, the Project does not propose construction of any structure equal to or greater than 150 feet in height, constituting a safety hazard to aircraft and/or operations from an airport or heliport. The Project would have a less-than-significant impact for the reasons detailed above, which is consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.
- 9(e) The Project is not within one mile of a private airstrip. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

9(f)(i) OPERATIONAL AREA EMERGENCY PLAN AND MULTI-JURISDICTIONAL HAZARD MITIGATION PLAN:

The Project would not interfere with this plan because it would not prohibit subsequent plans from being established or prevent the goals and objectives of existing plans from being carried out.

9(f)(ii) SAN DIEGO COUNTY NUCLEAR POWER STATION EMERGENCY RESPONSE PLAN:

The property is not within the San Onofre emergency planning zone.

9(f)(iii) OIL SPILL CONTINGENCY ELEMENT:

The Project is not located along the coastal zone.

9(f)(iv) EMERGENCY WATER CONTINGENCIES ANNEX AND ENERGY SHORTAGE RESPONSE PLAN:

The Project would not alter major water or energy supply infrastructure which could interfere with the plan.

9(f)(iv) EMERGENCY WATER CONTINGENCIES ANNEX AND ENERGY SHORTAGE RESPONSE PLAN:

The Project would not alter major water or energy supply infrastructure which could interfere with the plan.

9(f)(v) DAM EVACUATION PLAN:

The Project is not located within a dam inundation zone. Additionally, the development would not constitute a "Unique Institution" such as a hospital, school, or retirement home pursuant to the Office of Emergency Services included within the County Guidelines for Determining Significance, Emergency Response Plans. Therefore, the Project would not impair implementation of or physically interfere with an adopted dam evacuation plan.

9(g) The GPU EIR concluded this impact as significant and unavoidable. The Project is adjacent to wildlands that have the potential to support wildland fires. However, the project will not expose people or structures to a significant risk of loss, injury or death involving wildland fires because the project will comply with the regulations relating to emergency access, water supply, and defensible space specified in the Consolidated Fire Code for the 16 Fire Protection Districts in the County of San Diego. Implementation for these fire safety standards will occur during the building permit process. Additionally, the San Diego County Fire Authority reviewed and approved the project on August 1, 2018. Therefore, based on the review of the project by County staff and compliance with the County of San Diego Fire Authority, the project is not expected to expose people or structures to a significant risk of loss, injury or death involving hazardous wildland fires. Moreover, the project will not contribute to a cumulatively considerable impact, because all past, present and future projects in the surrounding area are required to comply with the Consolidated Fire Code.

The GPU EIR determined impacts from wildland fires to be significant and unavoidable. However, the Project would have a less-than-significant impact with no required mitigation for the reasons detailed above. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 9(h) The project does not involve, or support uses that allow water to stand for a period of 72 hours (3 days) or more (e.g. artificial lakes, agricultural irrigation ponds). Also, the project does not involve, or support uses that will produce or collect animal waste, such as equestrian facilities, agricultural operations (chicken coops, dairies etc.), solid waste facility or other similar uses. Therefore, the project will not substantially increase exposure to vectors, including mosquitoes, rats or flies, which is consistent with the GPU EIR determination of less than significant.

Conclusion

With regards to the issue area of Hazards and Hazardous Materials, the following findings can be made:

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. No mitigation measures contained within the GPU EIR would be required because Project specific impacts would be less than significant.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
10. Hydrology and Water Quality – Would the Project:			
a) Violate any waste discharge requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Is the project tributary to an already impaired water body, as listed on the Clean Water Act Section 303(d) list? If so, could the project result in an increase in any pollutant for which the water body is already impaired?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Could the Project cause or contribute to an exceedance of applicable surface or groundwater receiving water quality objectives or degradation of beneficial uses?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

- | | | | |
|---|--------------------------|--------------------------|--------------------------|
| f) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| g) Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| h) Provide substantial additional sources of polluted runoff? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| i) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map, including County Floodplain Maps? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| j) Place within a 100-year flood hazard area structures which would impede or redirect flood flows? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| k) Expose people or structures to a significant risk of loss, injury or death involving flooding? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| l) Expose people or structures to a significant risk of loss, injury or death involving flooding as a result of the failure of a levee or dam? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| m) Inundation by seiche, tsunami, or mudflow? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Discussion

- 10(a) The Project is required to implement water quality Best Management Practices (BMPs) to address site design, source control, and construction BMP requirements. A Priority Development Project Stormwater Quality Management Plan (SWQMP) was prepared for the project by IngenAE, LLC, dated December 16, 2019. The SWQMP demonstrates that the project will comply with all requirements of the County of San Diego BMP Design Manual County BMP DM) and the Watershed Protection Ordinance (WPO). The Project proposes and will be required to implement the following site design measures and/or source control BMPs and/or treatment control BMPs: vegetation stabilization planting, bonded fiber matrix or stabilized fiber matrix for flat areas and disturbed slopes, silt fence, gravel and sand bags, stabilized construction entrance, materials management, and waste management. These measures will enable the Project to meet waste discharge requirements as required by the Land-Use Planning for New Development and Redevelopment Component of the San Diego Municipal Permit (SDRWQCB Order No. R9-2015-0100), as implemented by the County of San Diego Jurisdictional Runoff Management Program (JRMP) and County BMP DM. Due to the reasons described above, the project will not violate any wastewater discharge requirements.
- 10(b) The Project lies in the Ramona (905.41) hydrologic subarea, within the San Dieguito Watershed hydrologic unit. According to the Clean Water Act Section 303(d) list, a portion of these watersheds are impaired: Pacific Ocean Shoreline at the San Dieguito Lagoon

and the San Dieguito River. The Project could contribute to release of pollutants; however, the Project will comply with the WPO and implement site design measures, source control BMPs, and treatment control BMPs to prevent a significant increase of pollutants to receiving waters.

- 10(c) As stated in responses 9(a) and 9(b) above, implementation of BMPs and compliance with required ordinances will ensure that the Project could not cause or contribute to an exceedance of applicable surface or groundwater receiving water quality objectives or degradation of beneficial use.
- 10(d) The Project will obtain its water supply from the Ramona Water District which obtains water from surface reservoirs or other imported sources. The Project will not use any groundwater. In addition, the Project does not involve operations that would interfere substantially with groundwater recharge.
- 10(e) As stated in response 9(a), the Project's PDP SWQMP would require the implementation of source control and/or treatment control BMP's to reduce potential pollutants, including sediment from erosion or siltation, to the maximum extent practicable from entering storm water runoff.
- 10(f) The Project will not significantly alter established drainage patterns or significantly increase the amount of runoff for the following reasons: based on a Drainage Study prepared by IngenAE, LLC on December 16, 2019, drainage will be conveyed to pipes/swale and a biofiltration system that matches existing drainage patterns.
- 10(g) The Project proposes to route runoff to pipes/swale and biofiltration facilities to avoid flooding off-site by attenuating velocities and reducing peak flows to pre-development conditions. Therefore, the project would not create or contribute runoff water that would exceed the capacity of existing or planned storm water drainage systems.
- 10(h) The Project has the potential to generate pollutants; however, site design measures, source control BMPs, and treatment control BMPs will be employed such that potential pollutants will be reduced to the maximum extent practicable. Therefore, impacts related to pollutant runoff will be less than significant.
- 10(i) No FEMA mapped floodplains, County-mapped floodplains or drainages with a watershed greater than 25 acres were identified on the Project Site or off-site improvement locations.
- 10(j) No 100-year flood hazard areas were identified on the Project Site.
- 10(k) The Project site lies outside any identified special flood hazard area.
- 10(l) The Project site lies outside a mapped dam inundation area for a major dam/reservoir within San Diego County. In addition, the Project is not located immediately downstream of a minor dam that could potentially flood the property.
- 10(m)(i) SEICHE: The Project site is not located along the shoreline of a lake or reservoir.
- 10(m)(ii) TSUNAMI: The Project site is not located in a tsunami hazard zone.
- 10(m)(iii) MUDFLOW: Mudflow is a type of landslide. See response to question 6(a)(iv).

Conclusion

With regards to the issue area of Hydrology and Water Quality, the following findings can be made:

1. No peculiar impacts to the project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
5. No mitigation measures contained within the GPU EIR would be required because Project specific impacts would be less than significant.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
11. Land Use and Planning – Would the Project:			
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

- 11(a) The Project would not propose any new infrastructure or major expansion of existing infrastructure, including public roads, major water or wastewater pipeline extensions, or utilities. The Project would develop a commercial use, a grocery store, in a lot designated for general commercial development, in an area surrounded by commercial and Public / Semi-Public land use types; therefore, build-out of the site was anticipated by the General Plan EIR. As such, the Project would not physically divide an established community.
- 11(b) The discretionary actions for the Project to develop a grocery store include a Site Plan for a “B” and “D” Designator for conformance with the Ramona Community Design Review Guidelines. The Project Site is zoned Village and has a General Plan designation of General Commercial. The Project falls within the Ramona Community Plan Area, and would be consistent with the Ramona Community Plan, the Ramona Form-Based Code, the General Plan, and the Ramona Design Review Guidelines. A site plan was prepared for the Project and was conceptually approved by the Ramona Design Review Board on August 8, 2019 and the Ramona Community Planning Group on September 6, 2018. Therefore, the Project would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the Project adopted for the purposes of avoiding or mitigating an environmental effect. As such, the Project would have a less-than significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

Conclusion

With regards to the issue area of Land Use and Planning, the following findings can be made:

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
6. No mitigation measures contained within the GPU EIR would be required because Project specific impacts would be less than significant.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
12. Mineral Resources – Would the Project:			
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

12(a) The GPU EIR determined that impacts to mineral resources would be significant and unavoidable. The California Surface Mining and Reclamation Act (SMARA) required classification of land into Mineral Resource Zones (MRZs). The Project Site has been classified by the California Department of Conservation – Division of Mines and Geology as MRZ-3. Areas classified as MRZ-3 contain known mineral deposits that may qualify as mineral resources. Further exploration work within these areas could result in the reclassification into the MRZ-2 category, which are areas underlain by mineral deposits where geologic data show that significant measured or indicated resources are present. However, the Project Site is not within the vicinity (1300 feet) of an identified MRZ-2 area as identified by the County Guidelines for Determining Significance, and the nearest identified MRZ-2 area to the site is more than 4 miles to the northwest. Additionally, the Project Site is approximately .08 miles from high density residential development, and as such, a future mining operation at the Project Site would likely create a significant impact to neighboring properties for issues such as noise, air quality, traffic, and possibly other impacts. Therefore, the Project will not result in the loss of a known mineral resource because the resource has already been lost due to incompatible land uses, an outcome analyzed in the GPU EIR.

12(b) The Project Site is not located in an Extractive Use Zone (S-82), nor does it have an Impact Sensitive Land Use Designation (24) with an Extractive Land Use Overlay (25). Therefore, impacts would be less than significant, which is consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

Conclusion

With regards to the issue area of Mineral Resources, the following findings can be made:

1. No peculiar impacts to the Project or its site have been identified.

2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
7. No mitigation measures contained within the GPU EIR would be required because Project specific impacts would be less than significant.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
12. Noise – Would the Project:			
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

- 12(a) The area surrounding the Project Site consists of multi-family use and commercial uses. The project will not expose people to potentially significant noise levels that exceed the allowable limits of the General Plan, Noise Ordinance, or other applicable standards for the following reasons:

General Plan – Noise Element: Policy 4b addresses noise sensitive areas and requires projects to comply with a Community Noise Equivalent Level (CNEL) of 60 decibels (dBA). Projects which could produce noise in excess of 60 dB(A) are required to incorporate design measures or mitigation as necessary to comply with the Noise Element. Based on a review of the County's noise contour maps, the project is not expected to expose existing or planned noise sensitive areas to noise in excess of 60 dB(A).

Noise Ordinance – Section 36-404: Non-transportation noise generated by the project is not expected to exceed the standards of the Noise Ordinance at or beyond the project's property line. The site as well as adjacent surrounding areas are zoned RMV5 that has a one-hour average sound limit of 60 dBA daytime and 55 dBA nighttime. Based on Staff's analysis of the information provided, the project does not involve any noise producing equipment that would exceed applicable noise levels at the adjoining property line.

Noise Ordinance – Section 36-410: The project will not generate construction noise in excess of Noise Ordinance standards. Construction operations will occur only during permitted hours of operation. Also, it is not anticipated that the project will operate construction equipment in excess of an average sound level of 75dB between the hours of 7 AM and 7 PM.

- 12(b) The project does not propose residential uses which are sensitive to low ambient vibration. The Project consists of a 19,857 square-foot grocery store. In addition, the Project does not include any activities that would expose existing or foreseeable noise sensitive land uses to vibration noise that exceeds the noise standards.
- 12(c) As indicated in the response listed under Section 12(a), the project would not expose existing or planned noise sensitive areas in the vicinity to a substantial permanent increase in noise levels that exceed the allowable limits of any applicable noise standards. Also, the project is not expected to expose existing or planned noise sensitive areas to noise 10 dB CNEL over existing ambient noise levels.
- 12(d) The project does not involve any operational uses that may create substantial temporary or periodic increases in ambient noise levels in the project vicinity. Also, general construction noise is not expected to exceed the construction noise limits of the Noise Ordinance. Construction operations will occur only during permitted hours of operation. Also, the project will not operate construction equipment in excess of 75 dB for more than an 8-hours during a 24-hour period.
- 12(e) The project is located within an Airport Land Use Compatibility Plan (ALUCP) for airports or within 2 miles of a public airport or public use airport. However, the project is not proposing any noise sensitive land uses.
- 12(f) The project is not located within a one-mile vicinity of a private airstrip, however, its located at approximately 1.3 miles away from the Ramona Airport. The Project Site is not proposing any noise sensitive land uses.

Conclusion

With regards to the issue area of Noise, the following findings can be made:

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. No mitigation measures contained within the GPU EIR would be required because Project specific impacts would be less than significant.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
14. Population and Housing – Would the Project:			
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

- 14(a) The Project Site is zoned as Village and has a General Plan Land Use Designation of General Commercial. The Project is for the development of a grocery store, and does not propose, nor would the site be compatible with, residential development. Additionally, the Project would take access from Main Street and 16th Street and does not propose the extension of roads or other infrastructure. The Project does not propose any physical or regulatory change that would remove a restriction to or encourage population growth in the area. The Project would have a less-than-significant impact for the reasons detailed above, which is consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.
- 14(b) The Project would not displace existing housing. As such, replacement housing would not be required elsewhere. Because this Project would not increase impacts identified within the GPU EIR, the Project would be consistent with the analysis provided in the GPU EIR.
- 14(c) The Project would not displace a substantial number of people. As such, replacement housing would not be required elsewhere. Because this Project would not increase impacts identified within the GPU EIR, the Project would be consistent with the analysis provided in the GPU EIR.

Conclusion

With regards to the issue area of Population and Housing, the following findings can be made:

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. No mitigation measures contained within the GPU EIR would be required because Project specific impacts would be less than significant.

Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
----------------------------------	--	-----------------------------------

15. Public Services – Would the Project:

a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance service ratios for fire protection, police protection, schools, parks, or other public facilities?

☐☐☐**Discussion**

15(a) Based on the review by County staff, the project's service availability forms, and concurrence received from the San Diego County Fire Authority on August 1, 2018 for the project, the project would not result in the need for significantly altered services or facilities. Because the Project does not general population, it will not affect school, park, or library services. Additionally, the project does not involve the construction of new or physically altered governmental facilities including but not limited to fire protection facilities, sheriff facilities, schools, or parks in order to maintain acceptable service ratios, response times or other performance service ratios or objectives for any public services. Therefore, the project will not have an adverse physical effect on the environment because the project does not require new or significantly altered services or facilities to be constructed. Because this Project would not increase impacts identified within the GPU EIR, the Project would be consistent with the analysis provided in the GPU EIR.

Conclusion

With regards to the issue area of Public Services, the following findings can be made:

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. No mitigation measures contained within the GPU EIR would be required because Project specific impacts would be less than significant.

Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
----------------------------------	--	-----------------------------------

16. Recreation – Would the Project:

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

☐☐☐

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

☐☐☐

Discussion

16(a) The Project proposes development of a grocery store. No new residential use types are proposed. As such, the Project would not increase the use of existing neighborhood and regional parks or other recreational facilities such that physical deterioration of the facility would be accelerated. The Project would have a less-than-significant impact for the reasons detailed above; therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

16(b) As described about in 16(a), the Project proposed the construction of a grocery store and thus does not include recreational facilities, nor require the construction or expansion of recreational facilities. As such, the Project would have a less-than-significant impact and would therefore be consistent with the analysis provided within the GPU EIR.

Conclusion

With regards to the issue area of Recreation, the following findings can be made:

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. No mitigation measures contained within the GPU EIR would be required because Project specific impacts would be less than significant.

**Significant
Project
Impact**

**Impact not
identified by
GPU EIR**

**Substantial
New
Information**

17. Transportation and Traffic – Would the Project:

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

☐☐☐

b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

☐☐☐

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

☐ ☐ ☐

d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

☐ ☐ ☐

e) Result in inadequate emergency access?

☐ ☐ ☐

f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

☐ ☐ ☐

Discussion

A Traffic Impact Study, prepared by LOS Engineering, Inc. and dated October 4, 2017 was prepared for the Project. The Project has frontage on Main Street, and improvements will be constructed to maintain existing conditions. Additionally, the project applicant will construct a full access driveway on 16th Street to the satisfaction of the County engineer.

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

The Traffic Impact Fee (TIF) program is designed to mitigate potential cumulative impacts to roadways in the unincorporated portion of San Diego County by funding future roadway improvements. As discussed in the traffic study, new Project trips would be distributed onto Mobility Element roadways in the County as analyzed by the TIF program, some of which are currently projected to operate at inadequate levels of service (LOS). The Project would result in an additional 877 average daily trips (ADT) to roadways in the Project area.

Level of Service (LOS) is a professional industry standard by which the operating conditions of a given roadway segment or intersection is measured. Level of Service is defined on a scale of A to F; where LOS A represents the best operating conditions and LOS F represents the worst operating conditions. LOS A facilities are characterized as having free flowing traffic conditions with no restrictions on maneuvering or operating speeds; traffic volumes are low and travel speeds are high. LOS F facilities are characterized as having forced flow with many stoppages and low operating speeds. The LOS ranges are defined below:

Level of Service Ranges			
Level of Service	Roadway Segments – Average Daily Traffic (ADT) Volume ¹	Signalized Intersections – Delay (Seconds/Vehicle) ²	Unsignalized Intersections – Delay (Seconds/Vehicle) ²
A	Less Than 1,900	Less Than or Equal to 10.0	Less Than or Equal to
B	1,901 to 4,100	10.1 to 20.0	10.1 to 15.0

C	4,101 to 7,100	20.1 to 35.0	15.1 to 25.0
D	7,101 to 10,900	35.1 to 55.0	25.1 to 35.0
E	10,901 to 16,200	55.1 to 80.0	35.1 to 50.0
F	Greater Than 16,200	Greater than 80.0	Greater than 50.0
¹ The volume ranges are based on the County of San Diego Circulation Element of a Light Collector, the average d provided in Appendix A. ² Highway Capacity Manual (HCM).			

Project Conditions

The Project is anticipated to generate primary traffic (new trips) in the amount of 877 average daily trips (ADT), 14 a.m. peak-hour trips (14 inbound and 0 outbound), and 181 p.m. peak-hour trips (92 inbound and 89 outbound). Based on the results of this TIS, all study intersections and roadways were calculated to operate at LOS D or better except for the intersection of SR-67/16th Street, where the Project could cause a direct and cumulative impact.

According to the Traffic Impact Study, the Project would not result in significant direct or cumulative impacts with the implementation of improvements and mitigation measures. Please see below for a list of Project improvements and mitigation measures.

Project Mitigation

The following are the proposed mitigation measures for the Project:

SR-67 (Main Street) and 16th Street (August 21, 2018 Intersection Control Evaluation (ICE))

- The applicant would be required to implement a no left-turn at the intersection of Main Street and 16th Street per CALTRANS concurrence

The SANDAG Regional Transportation Model was utilized to analyze projected build-out development conditions on the existing mobility element roadway network throughout the unincorporated area of the County. Based on the results of the traffic modeling, funding necessary to construct transportation facilities that will mitigate cumulative impacts from new development was identified. Existing roadway deficiencies will be corrected through improvement project funded by other public funding sources, such as TransNet, gas tax, and grants. Potential cumulative impacts to the region's freeways have been addressed in SANDAG's Regional Transportation Plan (RTP). Another element of this programmatic solution is the TIF program, which is designed to mitigate potential cumulative impacts to roadways in the unincorporated portion of San Diego County by funding future roadway improvements.

- The Project would be required to pay into the TIF program at the rate required by the Ramona TIF area to mitigate any cumulative impacts.

In addition, any required improvements to SR-67 and 16th Street would be constructed to improve existing conditions as it relates to bicyclists and pedestrians. The Project would not conflict with policies related to non-motorized travel such as mass transit, pedestrian or bicycle facilities. Therefore, the Project, in combination with other cumulative Projects would not conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for performance of the circulation system.

The GPU EIR determined significant and unavoidable impacts to unincorporated County traffic and LOS standards. The Project determined impacts to be potentially significant.

However, the Project would have a less-than-significant impact with the incorporation of GPU EIR mitigation measures Tra-1.4, Tra-1.7, and (as well as Project specific mitigation measures consistent with the GPU EIR) for a less than significant impact with mitigation. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 17(b) The designated congestion management agency for the County is the San Diego Association of governments (SANDAG). In October 2009, the San Diego region elected to be exempt from the State CMP and, since this decision, SANDAG has been abiding by 23 CFR 450.320 to ensure the region's continued compliance with the federal congestion management process. Therefore, the project would not conflict with an applicable congestion management program and would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.
- 17(c) The Project is located within an Airport Land Use Compatibility Plan (ALUCP) for airports (Ramona Airport) and is consistent with the plan. The Project is located within Airport Influence Area 2 and is not located within an Airport Safety Zone, an Avigation Easement, or an Overflight Area; therefore, no specific Project requirements are required. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.
- 17(d) The Project would not substantially alter traffic patterns, roadway design, place incompatible uses (e.g., farm equipment) on existing roadways, or create curves, slopes or walls which would impede adequate sight distance on a road, and therefore would have a less than significant impact on rural road safety. As such, the Project is consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.
- 17(e) The San Diego County Fire Authority has reviewed the Project and its Fire Protection Plan and have determined that there is adequate emergency fire access. In addition, consistent with GPU EIR mitigation measure Tra-4.2, the Project would implement the Building and Fire codes to ensure emergency access accessibility. The Project would have a less-than-significant impact for the reasons detailed above and is consistent with GPU EIR Mitigation Measure Tra-4.2; as such the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.
- 17(f) The Project would not result in the construction of any road improvements or new road design features that would interfere with the provision of public transit, bicycle or pedestrian facilities, and includes the construction of bike parking facilities on site to facilitate bicycle transit to the site. As such, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

Conclusion

With regards to the issue area of Transportation and Traffic, the following findings can be made

- 1. No peculiar impacts to the Project or its site have been identified.
- 2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
- 3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.

4. Feasible mitigation measures contained within the GPU EIR (Tra-1.4, Tra-1.7, and 4.2) would be applied to the Project. The mitigation measures, as detailed above, would require the Project applicant to comply with the Guidelines for Determining Significance and County TIF Ordinance, coordinate with other jurisdictions to identify appropriate mitigation and implement the Building and Fire Codes to ensure adequate services are in place.

	Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
18. Utilities and Service Systems – Would the Project:			
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) Result in a determination by the wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g) Comply with federal, state, and local statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Discussion

- 18(a) The Project would discharge domestic waste to a community sewer system that is permitted to operate by the Regional Water Quality Control Board (RWQCB). A Project facility availability form has been received from the Ramona Municipal Water District (RMWD) that indicates that there is adequate capacity to serve the Project. As the Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.
- 18(b) The project does not involve new water and wastewater pipeline extensions beyond the property frontage.

- 18(c) The project involves new storm water drainage facilities. However, these facilities (pipe/swale and biofiltration system) will not result in adverse physical effects because the layout would maintain existing drainage patterns. Because the Project would have a less-than-significant impact for the reasons detailed above, the Project would be consistent with the analysis provided within the GPU EIR.
- 18(d) A Service Availability Letter from the Ramona Municipal Water District (RMWD) has been provided which indicates that there is adequate water to serve the Project. The GPU EIR determined impacts to adequate water supplies be significant and unavoidable. However, the Project would have a less-than-significant impact with no required mitigation for the reasons detailed above. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.
- 18(e) A Service Availability Letter from the RMWD District has been provided, which indicates that there is adequate wastewater capacity to serve the Project. As such, the Project would have a less-than-significant impact to adequate wastewater facilities, which would not increase impacts identified in the GPU EIR.
- 18(f) All solid waste facilities, including landfills require solid waste facility permits to operate. There are five, permitted active landfills in San Diego County with remaining capacity to adequately serve the Project. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.
- 18(g) The Project would deposit all solid waste at a permitted solid waste facility. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

Conclusion

With regards to the issue area of Utilities and Service Systems, the following findings can be made:

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. No mitigation measures contained within the GPU EIR would be required because Project specific impacts would be less than significant.

Significant Project Impact	Impact not identified by GPU EIR	Substantial New Information
---	---	--

19. Wildfire – If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the Project:

- | | | | |
|--|--------------------------|--------------------------|--------------------------|
| a) Substantially impair an adopted emergency response plan or emergency evacuation plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts in the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| d) Expose people or structures to significant risk, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire instability, or drainage changes? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Discussion

Wildfire was analyzed within the GPU EIR within Section 2.7, Hazards and Hazardous Materials. The guidelines for determining significance stated: the proposed General Plan Update would have a significant impact if it would expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands. In 2019, the issue of Wildfire was separated into its own section within Appendix G of the CEQA Guidelines to incorporate the four issue questions above. The GPU EIR did address these issues within the analysis; however, they were not called out as separate issue areas. Within the GPU EIR, the issue of Wildland Fires was determined to be significant and unavoidable.

- 19(a) The Project Site is not located within a very high fire hazard severity zone (FHSZ), but an urban un-zoned area. The site is not under the jurisdiction of a specific fire protection district, but it is located approximately 0.8 miles from the nearest fire station, CalFire San Diego Ramona Fire Station 80, and 2.4 miles from CalFire San Diego Ramona Fire Station 82. Based on a review by County Staff of GIS Aerial Imagery, the site would have an Emergency Response Travel Time of 0 to 5 minutes (estimated travel time of 4 minutes from nearest station) which meets the General Plan Safety Element standard for lands designated as Village of 5 minutes.

Wildfire was analyzed within the GPU EIR within Section 2.7, Hazards and Hazardous Materials and was determined to be significant and unavoidable. However, the Project would have a less-than-significant impact with no required mitigation for the reasons detailed above. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 19(b) The 2.5-acre Project Site is mostly flat with some relatively steep (15-25%) and steep (>25%) slopes throughout the parcel. The project will however be required to comply with the Building and Fire Code and has been reviewed and approved by the San Diego County Fire Authority on August 1, 2018. The nearest fire station is 0.8 miles away, and the emergency response time is estimated to be between 0 and 5 minutes.

As previously stated, Wildfire was analyzed within the GPU EIR within Section 2.7, Hazards and Hazardous Materials and was determined to be significant and unavoidable.

However, the Project would have a less-than-significant impact with the incorporation of Project conditions consistent with GPU EIR Mitigation Measure Haz-4.3 for compliance with the Building and Fire Code. Therefore, the Project would be consistent with the analysis provided within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 19(c) The Project would not require the installation of any new infrastructure that may exacerbate fire risk. All infrastructure associated with the Project has been incorporated within this analysis. Therefore, no additional temporary or ongoing impacts to the environment related to associated infrastructure would occur that have not been analyzed in other sections of this environmental document.

As previously discussed, the GPU EIR determined impacts from Wildfire to be significant and unavoidable. However, the Project would have a less-than-significant impact with the incorporation of Project design features and conditions consistent with GPU EIR Mitigation Measure Haz-4.3. Therefore, the Project would be consistent with the analysis within the GPU EIR because it would not increase impacts identified within the GPU EIR.

- 19(d) The GPU EIR concluded this impact to be significant and unavoidable. As previously stated in 19(b), the Project would comply with regulations relating to emergency access, water supply, and defensible space specified in the County Fire Code and Consolidated Fire Code. Furthermore, the Project Site is not located within a Landslide Susceptibility Area and a soils compaction report with proposed foundation recommendation would be required to be approved prior to the issuance of a building permit. With incorporation of GPU EIR mitigation measures Haz-4.3, it is not anticipated that the Project would expose people or structures to significant risk due to post-fire instability. Therefore, for the reasons stated above, the Project would not expose people or structures to significant risk, including downslopes or downstream flooding or landslides, as a result of runoff, post-fire instability, or drainage changes.

Conclusion

With regards to the issue area of Wildfire, the following findings can be made:

1. No peculiar impacts to the Project or its site have been identified.
2. There are no potentially significant off-site and/or cumulative impacts which were not discussed by the GPU EIR.
3. No substantial new information has been identified which results in an impact which is more severe than anticipated by the GPU EIR.
4. Feasible mitigation measures contained within the GPU EIR (Haz-4.3) would be applied to the Project. This mitigation measure, as detailed above, requires the Project applicant to comply with the building and fire codes.

Appendices

Appendix A – References

Appendix B – Summary of Determinations and Mitigation within the Final Environmental Impact Report, County of San Diego General Plan Update, SCH # 2002111067

Appendix A

The following is a list of Project specific technical studies used to support the analysis of each potential environmental effect:

Biological Resources:

Biological Technical Report, Helix Environmental Planning, December 2019

Greenhouse Gas Emissions:

Climate Action Plan Checklist, December 19, 2019

Hydrology/Water Quality:

Drainage Study, IngenAE, LLC, December 16, 2019

Priority Development Project (PDP) Stormwater Quality Management Plan (SWQMP), December 16, 2019

Service Availability Forms:

Project Facility Availability – Water, Ramona Municipal Water District, February 18, 2020

Project Facility Availability – Sewer, Ramona Municipal Water District, February 18, 2020

Traffic/Transportation

Traffic Impact Study, LOS Engineering, March 4, 2020

Caltrans Concurrence Letter / Intersection Control Evaluation (ICE) Report, Michael Baker International, August 21, 2018

Intersection Sight Distance Exhibit/Certification, IngenAE, LLC, October 31, 2019

For a complete list of technical studies, references, and significance guidelines used to support the analysis of the General Plan Update Final Certified Program EIR, dated August 3, 2011, please visit the County's website at: <https://www.sandiegocounty.gov/content/sdc/pds/GP/GP-EIR.html#EIR>

Appendix B

A Summary of Determinations and Mitigation within the Final Environmental Impact Report, County of San Diego General Plan Update, SCH # 2002111067 is available on the Planning and Development Services website at:

[https://www.sandiegocounty.gov/content/dam/sdc/pds/gpupdate/docs/BOS_Aug2011/EIR/FEIR_7.00 - Mitigation Measures 2011.pdf](https://www.sandiegocounty.gov/content/dam/sdc/pds/gpupdate/docs/BOS_Aug2011/EIR/FEIR_7.00_-_Mitigation_Measures_2011.pdf)